

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

July 7, 2006

Stanley and Aaron Wong
2200 East 12th Street
Oakland, CA 94606

Subject: Fuel Leak Case No. RO0000327, Taxi Taxi, 2345 International Blvd., Oakland, CA

Dear Messrs. Wong:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the report entitled, "Feasibility Study and Corrective Action Report," dated June 14, 2006, prepared on your behalf by Cambria Environmental Technology, Inc. The "Feasibility Study and Corrective Action Report," dated June 14, 2006 presents a screening level risk assessment, the results of a dual phase extraction (DPE) pilot test, and an evaluation of remedial alternatives. DPE is the recommended remedial alternative to address hydrocarbon contamination in the vicinity of the former tank pit. We generally concur with the proposal to implement DPE at the site provided that the technical comments below are addressed during DPE implementation.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Remedial Objectives and Cleanup Goals.** We generally concur with the proposed remedial objectives for soil and cleanup goals for groundwater.
2. **Proposed DPE System Design.** The proposed design is to use existing wells RW-1, MW-1A, and MW-2A and install three additional extraction wells in the vicinity of the former tank excavation. We request that one additional extraction well be installed immediately northwest of boring B-1. Please present the results of the DPE system installation and initial operation in the DPE System Start-Up Report requested below.
3. **System Operation and Monitoring.** Please include plans for system operation and monitoring in the DPE System Start-Up Report requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **August 30, 2006** - Quarterly Monitoring Report for the Second Quarter 2006
- **November 15, 2006** - DPE System Start-Up Report

- **November 30, 2006 - Quarterly Monitoring Report for the Third Quarter 2006**

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

LANDOWNER NOTIFICATION REQUIREMENTS

Pursuant to California Health & Safety Code Section 25297.15, the active or primary responsible party for a fuel leak case must inform all current property owners of the site of cleanup actions or requests for closure. Furthermore, ACEH may not consider any cleanup proposals or requests for case closure without assurance that this notification requirement has been met. ACEH requires that you:

1. Notify all current record owners of fee title to the site of the proposed action;
2. Submit a letter to ACEH which certifies that the notification requirement in 25297.15(a) of the Health and Safety Code has been met;
3. Forward to ACEH a copy of your complete mailing list of all record fee title holders to the site; and
4. Update your mailing list of all record fee title holders, and repeat the process outlined above prior to submittal of any additional *Corrective Action Plan* or your *Request for Case Closure*.

43 Your written certification to ACEH (item 2 above) must state, at a minimum, the following:

A. *In accordance with Section 25297.15(a) of the Health & Safety Code, I, (name of primary responsible party), certify that I have notified all responsible landowners of the enclosed proposed action. (Check space for applicable proposed action(s)):*

cleanup proposal (Corrective Action Plan)

request for case closure

local agency intention to make a determination that no further action is required

local agency intention to issue a closure letter

- OR -

B. *In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (name of primary responsible party), certify that I am the sole landowner for the above site.*

(Note: Complete item A if there are multiple site landowners. If you are the sole site landowner, skip item A and complete item B.)

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

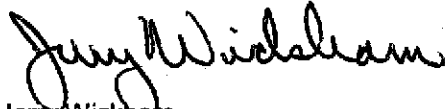
If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety

Stanley and Aaron Wong
July 7, 2006
Page 4

Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Matthew Meyers
Cambria Environmental Technology, Inc.
5900 Hollis Street, Suite A
Emeryville, CA 94608

Hamukh Patel
2321 International Boulevard
Oakland, CA 94606

Richard S. Cochran
P.O. Box 20327
Oakland, CA 94620-0327

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: May 31, 2006
	PREVIOUS REVISIONS: October 31, 2005, December 16, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

Submission Instructions

- 1) Obtain User Name and Password:
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of: **ftp Site Coordinator**.
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
03-24-06

ENVIRONMENTAL HEALTH SERVICES

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

March 24, 2006

Stanley and Aaron Wong
2200 East 12th Street
Oakland, CA 94606

Subject: Fuel Leak Case No. RO0000327, Taxi Taxi, 2345 International Blvd., Oakland, CA

Dear Messrs. Wong:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the documents entitled, "Site Assessment Report," dated March 10, 2006 and "Groundwater Monitoring Report - Fourth Quarter 2005," dated February 16, 2006. Both reports were prepared on your behalf by Cambria Environmental Technology, Inc. The Site Assessment Report presents the results of a site assessment activities conducted at the site in the latter half of 2005. The site assessment activities consisted of reconstruction of several monitoring wells, installation of additional monitoring wells, installation of a remediation well, soil sampling from selected monitoring well borings, and groundwater sampling from new and existing monitoring wells. Sampling results from the site assessment confirm previous findings that soil and groundwater have been impacted from fuel releases at the site. The Site Assessment Report recommends continuation of the groundwater monitoring program.

ACEH previously requested that you complete feasibility testing as proposed in the document entitled, "Feasibility Testing Work Plan," dated August 24, 2004. In our July 20, 2005 correspondence, we requested that the results of the feasibility testing be presented in a Feasibility Study Report and Corrective Action Plan by January 20, 2006. To date, we have not received results from the feasibility testing. We request that you complete the feasibility testing and submit the feasibility testing results as soon as possible but **no later than June 27, 2006**.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Hydraulic Gradient.** Local groundwater mounding appears to affect the hydraulic gradient for the site, which appears bifurcated and is not consistent with the regional hydraulic gradient. In order to help assess seasonal and local mounding effects on hydraulic gradient, we request that you measure water levels in all wells on a monthly or greater frequency for a period of three months beginning in April 2006. Please present the results, including Groundwater Elevation Contour Maps in the Feasibility Study Testing Report requested below.
2. **SPH Monitoring and Removal.** The "Groundwater Monitoring Report - Fourth Quarter 2005," dated February 16, 2006 indicates that if SPH is observed during the first quarter 2006 monitoring event, twice per month SPH removal events will be implemented. ACEH

concur with this approach. Please present the tabulated results of SPH removal in the quarterly monitoring reports requested below.

3. **Feasibility Testing.** The "Feasibility Testing Work Plan," dated August 24, 2004 proposed aquifer testing, a dual phase extraction (DPE) test, and a brief soil vapor extraction test prior to the DPE test. We request that you submit the results from the feasibility testing in the Feasibility Testing Report requested below.
4. **Quarterly Groundwater Monitoring.** Quarterly groundwater monitoring is to be continued for the site. Based on the detection of MTBE in well MW-12, please analyze future groundwater samples from wells MW-12, MW-11, and MW-3A for the fuel oxygenates ETBE, DIPE, TAME, and TBA by EPA Method 8260B in addition to the analyses currently performed. Please present the results in the quarterly monitoring reports requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **May 30, 2006** - Quarterly Monitoring Report for the First Quarter 2006
- **June 27, 2006** – Feasibility Testing Report
- **August 30, 2006** - Quarterly Monitoring Report for the Second Quarter 2006

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

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required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

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

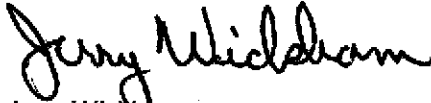
AGENCY OVERSIGHT

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

Stanley and Aaron Wong
March 24, 2006
Page 4

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Matthew Meyers
Cambria Environmental Technology, Inc.
5900 Hollis Street, Suite A
Emeryville, CA 94608

Hamukh Patel
2321 International Boulevard
Oakland, CA 94606

Richard S. Cochran
P.O. Box 20327
Oakland, CA 94620-0327

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SCWT
7-20-05

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

July 20, 2005

Aaron and Stanley Wong
2200 East 12th Street
Oakland, CA 94606

Subject: Fuel Leak Case No. RO0000327, Taxi Taxi, 2345 International Blvd., Oakland, CA

Dear Messrs. Wong:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the work plans entitled, "Site Assessment Work Plan," dated April 13, 2005 and "Feasibility Testing Work Plan," dated August 24, 2004 prepared for the above referenced site on your behalf by Cambria Environmental Technology, Inc. Separate phase hydrocarbons have been detected in all six wells located within your property. The lateral extent of off-site contamination has not been determined. The "Site Assessment Work Plan" proposes the replacement of three existing monitoring wells and the installation of six off-site monitoring wells. The "Feasibility Testing Work Plan" proposes remediation well installation, aquifer testing, a dual phase extraction (DPE) test, and a brief soil vapor extraction test prior to the DPE test. ACEH concurs with the work plans provided that the conditions identified in the technical comments below are met. We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Well Screen Length.** ACEH concurs that existing wells screened across two water-bearing zones should be destroyed and replaced with shallower wells with more appropriate screen intervals. ACEH requests that the screen length for the reconstructed wells within the upper water-bearing zone be no greater than 10 feet rather than 15 feet as proposed. Therefore, the depths of the wells are to be decreased. The filter packs for the reconstructed wells are to be installed as proposed, approximately 6 inches above the top of the well screen. Please present the results in the Site Investigation Report requested below.
- 2. Lower Water-bearing Zone.** In order to assess whether the lower water-bearing zone has been impacted and to assess vertical hydraulic gradients at the site, ACEH requests that a monitoring well be installed within the lower water-bearing zone at a location near well MW-1. Therefore, existing well MW-1 is to be overdrilled as proposed and replaced by a short screen monitoring well installed within the lower water-bearing zone and a shallower monitoring well installed within the upper water-bearing zone. As described in comment 1 above, the screen length for the shallower well in the upper water-bearing zone is to be no greater than 10 feet. The well installed within the lower water-bearing zone is to have a filter pack no greater than 5 feet in length. Please present the results in the Site Investigation Report requested below.

3. **Well MW-2.** Existing well MW-2 is to be overdrilled and reconstructed in addition to existing wells MW-1, MW-3, and TMW-4. The top of the well screen in well MW-2 is submerged which affects the ability of the well to detect and monitor free product at the site. In addition, since the well has a well screen length of approximately 23 feet, ambient vertical groundwater flow through the well and filter pack may affect static water levels and sample quality. Please present the results in the Site Investigation Report requested below.
4. **Aquifer Tests and Observation Wells.** The proposed constant rate aquifer test is not to be conducted until the existing monitoring wells have been reconstructed. ACEH requests that the reconstructed wells be used as observation wells during the constant rate aquifer test. Please present the results in the Feasibility Study Report requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Jerry Wickham), according to the following schedule:

- **August 30, 2005** - Quarterly Report for the Second Quarter 2005
- **November 20, 2005** – Site Investigation Report
- **November 30, 2005** - Quarterly Report for the Third Quarter 2005
- **January 20, 2006** – Feasibility Study Report and Corrective Action Plan
- **February 28, 2006** - Quarterly Report for the Fourth Quarter 2005

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to

Aaron and Stanley Wong
July 20, 2005
Page 3

present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

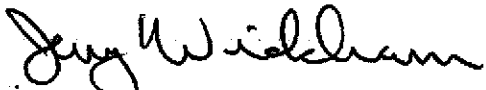
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

cc: Matthew Meyers
Cambria Environmental Technology, Inc.
5900 Hollis Street, Suite A
Emeryville, CA 94608

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



12-16-02

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

December 13, 2002

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

Dear Mr. Wong:

Subject: Fuel Leak Case No. RO0000327, 2345 E. 14th St., Oakland, CA94601

This letter confirms and approves the e-mail request from Mr. Bob Clark-Riddell, your consultant from Cambria Environmental. His request states that a groundwater sampling event will be performed at the referenced site in December 2002 and this report added to the technical reports previously requested to be submitted by December 11, 2002. The entire group of reports ie summary reports, conduit study, cross-sectional diagrams, proposal for future work and the December monitoring report will be submitted by January 31, 2003. With the condition that quarterly groundwater monitoring continue following the December 2002 event and future technical request deadlines be met, our office will consider your site in compliance.

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

Sincerely,

A handwritten signature in black ink that reads "Barney M. Chan".

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. S. Ramdass, SWRCB Cleanup Fund, 1001 I St., 17th Floor, Sacramento,
CA 95814-2828

Mr. B. Clark-Riddell, Cambria Environmental, 1144 65th St., Suite B, Oakland,
CA 94608

Techrepxt2345E14thSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director
October 10, 2002



10-11-02

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

Mr. Stanley Wong
2200 E. 12th St.
Oakland, CA 94606

Dear Mr. Wong

Subject: Fuel Leak Case No. RO0000327, 2345 E. 14th St., Oakland, CA 94601

Alameda County Environmental Health, Local Oversight Program (LOP), has received and reviewed the October 3, 2002 request from Cambria Environmental Technology, Inc. (Cambria), your new consultant, asking for a 90 extension for the submission of a technical report and groundwater monitoring report previously requested by October 11 and November 1, 2002, respectively. We understand time is needed for your consultant to obtain copies of past reports and familiarize themselves with your site. However, because the State Cleanup Fund is well acquainted with your site, I anticipate a quick response to pre-approval requests. Our office, therefore, grants a **60 day extension** for the submittal of these documents. Please submit the following technical report to our office in accordance with the following schedule.

Technical Report Request

- ~~October 11, 2002~~- December 11, 2002- Summary report of all past data, results of a utility/conduit study, current estimates of dissolved and free product, current cross sectional plots and further clarification of past bio-remediation activities and future proposed activities.
- ~~November 1, 2002~~- January 2, 2003- Quarterly groundwater monitoring report
- ~~February 1, 2003~~- April 2, 2003- Quarterly groundwater monitoring report

Please note that delays in investigation and late reports may result in your becoming ineligible for reimbursement from the Cleanup Fund.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. S. Ramdass, SWRCB Cleanup Fund, 1001 I St., 17th Floor, Sacramento, CA 95814-2828
Mr. Bob Clark-Riddell, Cambria Environmental, 1144 65th St., Suite B, Oakland, CA 94608

2ndTechRq2345E14thSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



9902

September 9, 2002

Mr. Stanley Wong
2200 E. 12th St.
Oakland, CA 94606

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

Dear Mr. Wong

Subject: Fuel Leak Case No. RO0000327, 2345 E. 14th St., Oakland, CA 94601

Alameda County Environmental Health, Local Oversight Program (LOP), has reviewed the case file for the subject site and determined that additional information is needed at your site to progress toward case closure. We have also discussed your site with individuals from the State Water Resources Control Board Cleanup Fund, Messrs. Sunil Ramdass, Dave Charter and Harry Patel. Before we can make any comments or recommendations for your site, we request that you address the following technical comments and submit the reports requested below.

Technical Comments

- The past monitoring and technical reports submitted by Sequoia Environmental have been incomplete. The groundwater monitoring reports should include, at a minimum a summary of all past analytical data, depth to water, free product thickness, sampling data sheets for each well with physical parameters and gradient contours. All reports must be signed and stamped by an appropriate registered professional.
- Please provide a summary report of all work that has previously been done at the site, along with data tables of soil and groundwater analytical data. Please include several cross sectional diagrams including the results of the most recent Sequoia Environmental borings.
- Please provide a utility/conduit study and incorporate this information in your cross sections.
- Please provide a site map indicating the current extent of dissolved and free product. Please review the past off-site data and determine if additional plume delineation is necessary.
- Please provide as much detail as possible regarding what work has been done using the enhanced bioremediation technique and what is proposed for future work. Our office respects those items which may be proprietary, however, more information must be provided for our office to make an informed evaluation for future actions.

Technical Report Request

- October 11, 2002- Summary report of all past data, results of a utility/conduit study, current estimates of dissolved and free product, current cross sectional plots and further clarification of past bio-remediation activities and future proposed activities.
- November 1, 2002- Quarterly groundwater monitoring report
- February 1, 2003- Quarterly groundwater monitoring report

Please note that delays in investigation and late reports may result in your becoming ineligible for reimbursement from the Cleanup Fund.

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

September 9, 2002
RO0000327
2345 E. 14th St., Oakland, CA 94601
Mr. Stanley Wong
Page 2

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. S. Ramdass, SWRCB Cleanup Fund, 1001 I St., 17th Floor, Sacramento, CA 95814-2828
Mr. C. Wabuzoh, Sequoia Environmental, 900 Murmansk St., Suite 1B, Oakland, CA 94607
TechRq2345E14thSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



07-15-02

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

July 11, 2002
RO0000327

Ms. Shari Knieriem
SWRCB Cleanup Fund
1001 I St., 17th Floor
Sacramento, CA 95814-2828

Dear Ms. Knieriem:

Subject: Cleanup Fund Eligibility for 2345 East 14th St., Oakland CA 94601

Alameda County Environmental Health Local Oversight Program requests that the Cleanup Fund initiate actions to remove the above referenced site (Claim No. 002255) from Fund eligibility. Mr. Stanley Wong has been notified many times by his consultant Sequoia Environmental and in writing by our office (May 28, 2002 letter) to continue remediation and groundwater monitoring at this site. I was informed Sequoia Environmental disconnected the existing bioremediation system on June 2, 2002 due to lack of payment to the contractor. This is unfortunate, since progress had been made in reducing the amount of free product in monitoring wells at the site.

In addition, the Fund (Mr. Sunil Ramdass) had previously pre-approved the initiation of this project in their December 16, 2001 letter to Messrs. Wong. This pre-approval was for one month of bio-remediation. I assumed that the Fund would approve the remediation in a stepwise approach, knowing that enhanced bio-remediation and confirmation sampling is a lengthy process. In response to a request from Mr. Wong, Sequoia Environmental provided a June 6, 2002 cost estimate for nine months of enhanced bio-remediation. I'm confused why a site in the Fund, which has already spent considerable amounts on less effective remediation, would not get approval for an approach that is giving promising results. Further, I'm confused why a RP who is Fund eligible would risk losing Fund eligibility and be left totally responsible for site cleanup costs. I appreciate your assistance in this matter and hope that the remediation project might be resumed to completion.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. C. Nwabuzoh, Sequoia Environmental, 900 Murmask St., Suite 1B, Oakland CA 94607
Mr. Sunil Ramdass, SWRCB Cleanup Fund

Fundltr2345E14th

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



05-29-02

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

May 28, 2002

Mr. Stanley Wong
2200 E. 12th St.
Oakland, CA 94606

Dear Mr. Wong:

Subject: Fuel Leak Case RO0000327, 2345 International Blvd., Oakland CA 94601

Alameda County Environmental Health, Local Oversight Program (LOP), has been made aware of a problem with the on-going remediation and investigation at the referenced site. The May 21, 2002 letter from Sequoia Environmental to you indicates that there is a potential for stoppage of both remediation and groundwater sampling at your site. I urge you to correct whatever problems exist and continue immediately with the remediation and sampling at the site. I understand that after a little initial difficulty, the enhanced bio-remediation has showed promising results. It is critical to monitor the effect of the addition of nutrients and microbes throughout the remediation process by sampling and testing groundwater regularly. In addition, confirmation post-treatment monitoring is necessary to verify completeness of treatment.

You are cautioned that any delays in your remediation and reporting may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund. In addition, we may consider referring your case to the Regional Water Quality Control Board or the District Attorney Office for enforcement.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. C. Wabuzoh, Sequoia Environmental, 900 Murmask St., Suite 1B, Oakland, CA
94607

2345IntBlvd

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



-4-01

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

October 2, 2001
StID 2116/ RO0000327

Mr. Stanley Wong
2200 E. 12th St.
Oakland, CA 94606

Re: Remedial Action Work Plan for 2345 E. 14th St., Oakland CA 94601

Dear Mr. Wong:

Our office has reviewed the July 19, 2001 Subsurface Investigation Report for the referenced site prepared by Sequoia Environmental. As you are aware, as part of the proposed remedial action plan (RAP) for this site, additional site characterization was performed to determine the limits of the free product that has consistently been found in on-site wells. Seven borings, one of which was converted into MW-6, were advanced in May 2001. Soil and groundwater samples were collected for analysis. Groundwater sampling was also performed at this time to confirm prior results. The following observations can be made from this investigation:

- Free petroleum product remains in wells MW-1, MW-2 and MW-3.
- Elevated dissolved petroleum contamination was found in borings SB-1, SB-3, SB-4 and SB-5, consistent with the westerly gradient recently determined. The petroleum plume is likely migrating off-site. Prior off-site investigations did not detect significant off-site petroleum contamination because that investigation assumed a northerly gradient.

The proposed RAP is still appropriate for the site ie bio-remediation of free product, bio-treatment of extracted groundwater and re-injection of treated groundwater. Should the groundwater gradient be confirmed to be westerly, MW-4 may be used as the up-gradient well where the treated water can be re-introduced. You may proceed with the RAP. Please provide the specifications of the remediation equipment, its typical design and MSDS on chemicals to be used. Will the free product be treated in the wells or pumped out and then treated?

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. C. Wabuzoh, Sequoia Environmental, 1111 Aladdin Ave., Suite B, San Leandro,
CA 94577

Mr. M. Owens, SWRCB, 1001 I St., 17th Floor, Sacramento, CA 95814
RAPap2345E14thSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



8-04-01

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

August 3, 2001 ✓
StID 2116/RO0000327

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

Re: Subsurface Investigation at 2345 International Blvd., Oakland 94601

Dear Mr. Wong:

Our office has received and reviewed the July 19, 2001 Subsurface Investigation Report by Sequoia Environmental for the above referenced site. We have also spoken with Mr. Chris 'Wabuzoh of Sequoia regarding these results and their effect on the proposed remediation for this site. As you may recall, this report included the results of borings advanced to determine the extent of the free product plume, the installation of one up-gradient well and its monitoring along with the monitoring of the existing wells with the exception of MW-4. This information is necessary because free product must be removed prior to implementing the enhanced bio-remediation procedure approved by our office. Although no free product was encountered in any of the six soil borings and one monitoring well, elevated gasoline concentrations were observed in borings SB-4 and SB-3. In addition, among the existing wells, free product was observed in MW-2, MW-3 and MW-5. Free product must be removed from these wells prior to starting the bio-remediation work plan.

The following items will need to be addressed or done:

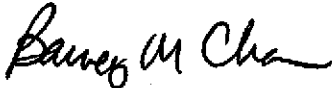
- Mr. Wabuzoh will provide corrected data sheets for this report. It appears that some data in the Tables has been transposed.
- MW-3, which could not be surveyed will be surveyed and incorporated in the groundwater gradient map for the site. MW-4, should also be incorporated in the gradient map, even though sampling of this well is no longer required.
- The gradient map on Figure 5 of this report should be reviewed, revised and corrected as necessary. The current map does not appear correct as presented.
- Please have your consultant provide a figure estimating the extent of the free product plume.
- When providing groundwater monitoring data, please include at least several years of historical results along with the current sampling results. Please also provide the monitoring well sampling data sheet for each well sampled.
- A revised work plan will be provided outlining what will be done in the interim, prior to starting the bio-treatment work plan.

Mr. Stanley Wong
August 3, 2001
StID 2116/RO0000327
2345 E. 14th St., Oakland 94601
Page 2.

Please provide the requested information to our office within 30 days or no later than September 4, 2001.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. C. Wabuzoh, Sequoia Environmental , 111 Aladdin Ave., Suite B, San Leandro 94577
Mr. M. Owens, SWRCB, 1001 I St., 17th Floor, Sacramento, CA 95814

Addrp2345E14

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



03-09-01

P0329

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

March 8, 2001
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

Re: Remedial Action Work Plan for 2345 E. 14th St., Oakland CA 94601

Dear Mr. Wong:

Our office has received and reviewed the revised August 28, 2000 Sequoia Environmental Remedial Action Work Plan received on February 26, 2001. The work plan provides more detailed information than the original. It includes three elements:

- Performing a baseline monitoring report.
- Advancement of borings to determine the limits of the free product and
- Installation of an enhanced bio-remediation treatment system.

Our office has the following comments to each of these elements:

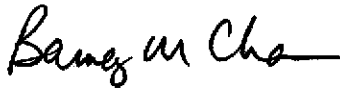
- The baseline monitoring report is approved and should be performed immediately. Groundwater samples should be tested for TPHg, BTEX and MTBE. Monitoring well TMW-5 should be re-surveyed and its elevation should be included in all future gradient determinations. Sampling of Well TMW-4 may be omitted. **Please provide a monitoring report to our office within thirty days or no later than April 13, 2001. Also note that semi-annual monitoring is required at the site. The last monitoring event was in 12/99.**
- Seven borings are proposed to determine the extent of the free product. In addition, one of the borings, SB-7, will be developed into a 4 inch monitoring well to be used in the bio-remediation treatment system as an injection well. The borings should be advanced to groundwater, not limited to the 15' depth stated in the work plan. Both soil and grab groundwater samples will be collected for chemical analysis. The new well need not be included in the baseline monitoring unless it is installed and developed in time to meet the April 13, 2001 deadline mentioned above. This portion of the work is approved and should be implemented as soon as possible.
- Based upon the results of the boring investigation, it is assumed that the TPHg plume can be treated by pumping total fluids from wells MW-1, MW-2, MW-3 and TMW-5. The contaminated groundwater will be sampled from each well, combined and treated in above ground tanks, to which has been added hydrocarbon degrading microbes, nutrients and hydrogen peroxide. After the petroleum concentration of the groundwater has been bio-remediated, it will be sampled and re-injected into the new well, SB-7. Above ground surface pumps will help to re-circulate the treated water which will be enriched with the mentioned additives. Weekly, bi-weekly and monthly sampling will be performed to track the treatment progress. After the groundwater has reached acceptable petroleum levels, the system will be turned off and quarterly monitoring will be resumed to verify plume stability

Mr. Stanley Wong
StID #2116
2345 E. 14th St., Oakland CA 94601
March 8, 2001
Page 2.

Although the work plan states that no permit will be required to perform these tasks, our office will require verification that the Water Board has waived the permit requirements for re-injecting treated groundwater above drinking water MCLs. It is anticipated that waiver can be obtained on a site-specific basis. Please contact either Mr. Chuck Headlee or Greg Bartow of the SFRWQCB.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. C. Wabuzoh, Sequoia Environmental, 1111 Aladdin Ave., San Leandro, CA 94577

Mr. Chuck Headlee, SFRWQCB

Mr. M. Owens, SWRCB Cleanup Fund, 1001 I St., 17th Floor, Sacramento CA 95814-2828

Wpap2345E14

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



01-05-01
PO327

January 5, 2001
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

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

Re: Request for Technical Reports for 2345 E. 14th St., Oakland CA 94601

Dear Mr. Wong:

This letter serves to update and clarify the status of the above site. As you are aware, our office has been in contact with your new consultant, Mr. Chris 'Wabuzoh of Sequoia Environmental. We have been evaluating his proposal for bio-remediation. Please keep in mind, you are still required to provide a baseline monitoring report, survey well TMW-5 and provide a work plan for the determination of the extent of free product. **These items were requested to be submitted by December 15, 2000 and as yet have not been received. Please perform this work and submit the monitoring report to our office within 30 days or no later than February 13, 2001. Semi-annual monitoring should follow.**

The information submitted regarding the proposed bio-remediation through the existing monitoring wells is not adequate for our office's approval. The information failed to discuss the design of the groundwater treatment system, the construction of infiltration wells, soil and groundwater sampling pre and post treatment, permit requirements and examples of use of this treatment at similar sites. The one site provided as a similar site example, lacked site specific information such as extent of free and dissolved product, concentration and types of contamination, type and amounts of material added and regulatory concurrence. Our office cannot approve of the addition of bio-remediation products into existing wells without an acceptable work plan and agencies' approval. Remember, our office does not act independently. We work with the Regional Water Quality Control Board and for this work to be reimbursable, all work must also be deemed reasonable by the State Clean-up Fund.

Please provide your bio-remediation work plan thirty days after the submission of the requested baseline monitoring report. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. C. 'Wabuzoh, Sequoia Environmental, 1111 Aladdin Ave., Suite B, San Leandro 94577
Mr. M. Owens, SWRCB Cleanup Fund, 1001 I St., 17th Floor, Sacramento CA 95814

Rep2345E14

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



11-14-00

20327

November 13, 2000
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

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

Re: Request for Technical Reports for 2345 E. 14th St., Oakland CA 94601

Dear Mr. Wong:

I have spoke with Mr. 'Wabuzoh of Sequoia Environmental and it appears that there is a need for clarification of the County's request for technical reports. Therefore, this letter serves to formally request the following reports/information from you:

- A baseline monitoring report is requested. Sampling of well TMW-4 may be omitted, however, all wells should be have groundwater elevation readings taken to be used in determining gradient. The groundwater samples should be analyzed for TPH as gasoline, BTEX and MTBE.
- Monitoring well TMW-5 should be surveyed consistent with the other wells and its groundwater elevation should be included in the gradient map.
- The extent of free product must be determined. Your previous consultant proposed to install a grid of borings to make this determination, however, your new consultant has not provided any proposal. Please provide your method for free product determination. I understand this will be done after the proposed baseline sampling event.
- My October 4, 2000 letter requested additional information on Sequoia Environmental's bio-remediation work plan. Specifically, you are requested to provide all technical information on the proposed remediation ie necessary equipment, typical design, permit requirements, MSDS on all chemicals and historical case studies.

It is apparent that you will not be able to meet the November 20, 2000 deadline previously requested. **You are requested to provide the requested reports, with the exception of the free product determination work plan, to our office within 30 days or no later than December 15, 2000.**

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. C. 'Wabuzoh, Sequoia Environmental, 1111 Aladdin Ave., Suite B, San Leandro 94577
Mr. M. Owens, SWRCB, 1001 I St., 17th Floor, Sacramento, CA 95814

2345E14

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



10-10-2000

RO# 327

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

October 4, 2000
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

Re: Site Investigation at 2345 E. 14th St., Oakland CA 94601

Dear Mr. Wong:

Thank you for your letter of clarification dated September 28, 2000 where you identified Sequoia Environmental as your new and sole environmental consultant for the above site. As you are aware, there has been very little activity this year due to the uncertainty of which consultant had the lead and which work plan was being considered. In fact, our office had previously approved a remedial action and a product plume definition work plan by Tank Protect Engineering for the site. It is assumed that these prior approved work plans are no longer valid.

Our office has also received an August 28, 2000 Remedial Action Work Plan for the site from Sequoia Environmental. In order to assist you and get your project back on track, I am requesting additional items prior to evaluating the August 28th work plan. These items include some elements of the prior work plans. Please address the following:

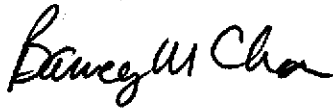
- Based on the large amount of prior monitoring data, a change from quarterly to semi-annual groundwater monitoring is appropriate. In addition, sampling and analysis of TMW-4 is no longer required. Sequoia Environmental's baseline sampling recommendation may be used as your first semi-annual sampling event for this year. The samples should be analyzed for TPH-G, BTEX and MTBE.
- Well TMW-5 should be re-surveyed and included in all future groundwater gradient maps. This information is necessary to help determine the possible extent of contamination of free and dissolved product.
- Although free product has not been found in any off-site borings, the extent of free product on-site has not. The previous Tank Protect work plan proposed to install a grid array of piezometers to determine the extent of free product. Isn't there a need to determine the extent and possible mass of the free product? Will the proposed bio-enhancement work plan be effective on free product? Is it necessary to remove free product prior to adding the bio-enhancement compounds? Please provide some specific technical information regarding the use of the proposed treatment compounds and their use on sites with similar geology and contaminants.

Please provide your baseline groundwater monitoring report, including groundwater gradient with well TMW-5 elevation, and a comment to the above questions to our office within 45 days or no later than November 20, 2000.

Mr. Stanley Wong
2345 E. 14th St., Oakland CA 94601
StID # 2116
October 4, 2000
Page 2.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. C. Wabuzoh, Sequoia Environmental, 1111 Aladdin Ave., Suite B., San Leandro,
CA, 94577

Mr. M. Owens, SWRCB, 2014 T. St., Suite 130, Sacramento, CA 94244-2120

2345E14thReq

SENT 7-14-2000

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

20327

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

July 13, 2000
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

Re: Status of Investigation at 2345 E. 14th St., Oakland CA 94601

Dear Mr. Wong:

Our office is confused as to the status of the investigation at the above referenced site. We have been contacted by two different consultants who believe they are now in charge, namely Tate Environmental in conjunction with Tank Protect Engineering and Sequoia Environmental. At the same time, Tank Protect Engineering has provided and received approval of a work plan to determine the extent of the free product plume. A number of other items are included in this April 7, 2000 work plan. I have spoke with Sequoia Environmental and have been informed that they will be submitting their own work plan. We have also been informed that you may be considering another consultant other than these mentioned.

In order to keep this investigation and remediation on track you need to clarify who is your consultant, identify which work plan is being proposed for the site, insure that our office has reviewed and approved this work plan, and provide a time schedule for this work.

Please be advised regardless of which consultant you choose, our office requests continued semi-annual groundwater monitoring, re-surveying TMW-5, an determination of the extent of free product and a groundwater remediation plan. **Please provide a written update on your site to our office within 15 days or no later than July 31, 2000.** Keep in mind, you must remain in compliance with our office to stay eligible for the Clean-up Fund.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. J. Farhoomand, TPE, 2821 Whipple Rd., Union City, CA 94587
Mr. R. Dreessen, Tate Environmental, 275 Paraiso Dr., Danville, CA 94526
Mr. C. Nwabuzoh, Sequoia Environmental, 1111 Aladdin Ave., San Leandro, CA 94577

Status2345E14th

SENT 6-19-2000

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0327

June 15, 2000
StID # 2116

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

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

Re: Product Plume Definition Work Plan for 2345 E. 14th St., Oakland CA 94601

Dear Mr. Wong:

Our office has received and reviewed your April 7, 2000 work plan for product plume definition as prepared by Mr. Richard Dreessen Jr., representing Tank Protect Engineering. This work plan responds specifically to the items in my March 6, 2000 letter. The site has shown little effects of the soil excavation, still remains highly impacted in groundwater and is not yet totally characterized. It is expected that the information from this proposed work will be used to design and remediate the removal of free product and dissolved product plume.

Our office has discussed the work plan with Mr. Dreessen and approves the work plan which consists of the following:

- Re-surveying TMW-5, so that this data point can be used in groundwater gradient determination.
- This information will be used to select the locations of up to 12 piezometers, which will be used to determine the limits and amount of free product at the site. At this time, the proposed locations of these temporary wells are around the perimeter of the site, with the exception of the area of TMW-4, which has historically been clean.
- Three geoprobe borings will also be advanced to obtain continuous coring and boring logs and to allow for geotechnical testing to estimate spacing for extraction wells, should they be necessary.

An important part of the proposal is the conclusion and recommendation after the results of this work has been evaluated. The proposed time schedule for the next stage of remedial work is necessary to keep the remediation on track.

Please contact me prior to when this work is to be done. You may contact me at (510) 567-6765.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. J. Farhoomand, TPE, 2821 Whipple Rd., Union City, CA 94587

Mr. R. Dreessen, Tate Environmental, 275 Paraiso Dr., Danville, CA 94526

Wpap2345E14

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SNT 3-6-00
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PO327

March 6, 2000
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

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

Re: Site Investigation at 2345 E. 14th St., Oakland CA 94601, Former Credit Auto Sales

Dear Mr. Wong:

I have received and reviewed your Fourth Quarter Monitoring report for the above site, prepared by Tank Protect Engineering (TPE). It is evident that groundwater contamination and concentrations have not decreased. This result is seen through over six years of monitoring, five years of which have occurred after extensive soil excavation. The 12/28/99 groundwater monitoring event reported free product in MW-1, MW-2 and MW-3. Because of these results, it would appear that the previously submitted work plan for the advancement of up to 135 ORC geoprobe borings will be put on hold since ORC is not recommended for use in the presence of free product. In addition, the installation of recovery wells only near these three wells is also not a reasonable approach.

With this current situation, it appears that a more aggressive approach is needed to remove free product before the ORC injection is considered. If we assume that these three wells mark the boundary of potential free product, the removal of product from only these wells will do very little to remove the overall free product at the site. You should, therefore, consider options, which will have a greater impact on free product in the entire site. Before this is done, please estimate or provide a work plan to estimate the boundaries of the free product plume.

Please provide your written response to this letter within 30 days or no later than April 7, 2000.

Until remediation is started, please decrease site monitoring to semi-annual monitoring, in either the first and third or second and fourth quarters of the year. No significant change in groundwater quality is expected without remediation. In addition, please provide a remediation status report in your correspondences and reports to our office.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. J. Farhoomand, TPE, 2821 Whipple Rd., Union City, CA 94587

Mr. M. Owens, SWRCB, 2014 T. St., Suite 130, Sacramento, CA 94244-2120

2RAWP2345

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 10-13-99
J. FAARHOLM AND
M. OWENS
S. WONG

October 12, 1999
StID # 2116

R0327

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

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

**Re: Remedial Action Work Plan for Credit World Auto Sales, 2345 E. 14th St.,
Oakland 94601**

Dear Mr. Wong:

Our office has received and reviewed the September 15, 1999 work plan by Tank Protect Engineering (TPE) referenced above. This work plan modifies slightly, the original October 29, 1997 Remedial Action Plan from TPE. In addition to installing a remediation well, it proposes to install up to 135 geoprobe borings and inject oxygen-releasing compound (ORC) slurry into these borings. However, TPE must first insure that free product is not present prior to the advancement of the geoprobe ORC borings since ORC is not recommended for free product conditions.

Ultimately, ORC injection would enhance bio-remediation and reduce contaminant concentrations. After ORC application, groundwater will be sampled for both chemical and biochemical parameters on a regular schedule. It is hoped that groundwater concentration will stabilize and be reduced to acceptable levels within one year, at which time, site closure will be requested.

I have discussed the work plan with Mr. Richard Dreesen of TPE and with the following conditions, your work plan is approved:

- TPE will provide our office with a printout of the spreadsheet used to calculate the amount of ORC needed to treat the contamination.
- Although the work plan states that nutrients and bacteria might be added, TPE assumes that there is already an adequate supply of both and does intend on adding these.
- The bio-remediation parameters: BOD, oxidation-reduction potential, dissolved oxygen, nitrates, ferrous iron and sulfate will be run monthly after ORC injection and bi-monthly thereafter. Please include an interpretation of these results in the quarterly monitoring reports.
- If free product is found in remediation well one (RW-1), it is assumed that free product may also exist near the other wells where free product was found and additional remediation wells will be installed. An in-well separating device will be installed into this well. Although a true pump test is not planned from this well, the extent of free product will be estimated based on its recharge rate of free product.

A detailed schedule is provided for the presumed status of this remediation based on the weekly time period after submitting this work plan to our office. Please keep our office informed at to the whether the proposed schedule for implementation is being met.

Mr. Stanley Wong
StID # 2116
2345 E. 14th St., Oakland 94601
October 12, 1999
Page 2.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. J. Farhoomand, TPE, 2821 Whipple Rd., Union City, CA 94587

Mr. M. Owens, SWRCB, 2014 T. St., Suite 130, Sacramento, CA 94244-2120

RAWPap2345

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



PO 327

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

September 1, 1999
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

Re: Feasibility Study and Remedial Action Plan for 2345 E. 14th St., Oakland CA 94601

Dear Mr. Wong:

Since my last letter to you, it appears that there has again been a change in your consultant's recommendation for remediation at the above site. Because of this change, your work plan was not submitted by the requested July 26, 1999 extension date mentioned in my May 24, 1999 letter.

I have spoke with Mr. Rick Dreessen, who has been contracted by your consultant, Tank Protect Engineering (TPE) to provide your work plan. I requested that he review the previously prepared Feasibility Study (FS) and Corrective Action Plan (CAP) for this site before making any recommendation. This site has not seen a significant improvement from the prior remediation plan ie soil excavation. Upon his review of the files, Mr. Dreessen stated he had some concern as to whether free product still exists at this site. Since the groundwater elevation in site wells has been above the screened interval in the wells, this poses a problem in determining if free product is present. The intermittent appearance of free product in wells may not indicate the occurrence of natural bio-remediation and the lack of free product, rather it may be the result of the varying depth of groundwater. With this in mind, Mr. Dreessen has proposed the installation of a large diameter well, properly screened to verify the presence of free product. The well would be used for free product extraction, if present. Enhanced bio-remediation is being considered if free product is absent.

I have requested that your next work plan review past site work and results, review the remedial alternatives and justify the next remedial action proposed for the site. Mr. Dreessen has informed me that this work plan is near completion. Therefore, please submit your work plan **within 30 days or by October 1, 1999.**

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. J. Farhoomand, TPE, 2821 Whipple Rd., Union City, CA 94587-1233

3wprq2345E14

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0327

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

May 24, 1999
StID #2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

Re: Remedial Action Plan for 2345 E. 14th St., Oakland CA 94606

Dear Mr. Wong:

This letter approves your consultant's request for an extension for the submittal of a work plan for the above referenced site. The extension is granted to July 26, 1999. Please include in this work plan a response to my April 23, 1999 letter.

It appears that Tank Protect Engineering (TPE) has changed its recommendations for this site; the October 1997 TPE work plan proposed enhanced bio-remediation with a recovery well, the April 5, 1999 work plan proposed performing a dual phased extraction test and now the most recent letter proposes enhanced bio-remediation again. Because of this, I requested that your consultant review the original October 1997 remedial action plan (RAP) to see if the conditions at the site still indicate the same remedial approach. If this is the case, please have your consultant address the bulleted items in my April 23, 1999 letter within your work plan.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. L. Travis III, TPE, 2821 Whipple Rd., Union City, CA 94587-1233

Wpext2345

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

R0#327

March 11, 1999

StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

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

Re: Request for Work Plan for Enhanced Bio-remediation at 2345 E. 14th St., Oakland 94601

Dear Mr. Wong:

Our office has received and reviewed your recent February 11, 1999 Fourth Quarter 1998 monitoring report prepared by Tank Protect Engineering (TPE). The results from this monitoring event show the continual presence of high dissolved gasoline and BTEX components and the presence of free product. This trend indicates that natural bio-remediation is not occurring or occurring at a slow rate. This point was stated in my April 28, 1998 letter.

As you may recall, TPE prepared a Remedial Action Plan (RAP) for this site and submitted it in an October 20, 1997 report. The RAP evaluated the alternatives, long term monitoring, pump and treat and a remediation trench or a remediation well in combination with enhanced bio-remediation. The remediation well and enhanced bio-remediation was recommended by TPE. In my April 28, 1998 letter, I agreed with the enhanced bio-remediation approach, however, I requested a specific work plan. The specifics of the work plan were to be developed by speaking with the various companies specializing in this remediation. It may include the addition of oxygen releasing compound, nutrients, surfactants and/or microbes. In addition, I requested that bio-remediation parameters be analyzed. You were requested to submit a work plan by May 29, 1998. Since then, our office has not received a work plan and groundwater conditions have not improved. Therefore, you should provide a specific work plan for enhanced bio-remediation along with a time schedule for its implementation.

Please submit your work plan to our office **within 45 days or by April 26, 1999**. Please be informed that the failure to submit this work plan will cause our office to consider your site out of compliance and thus ineligible for reimbursement from the Cleanup Fund.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. J. Farhoomand, TPE, 2821 Whipple Rd., Union City, CA 94587-1233
C. Gordon, SWRCB Cleanup Fund, 2014 T St., Suite 130, P.O. Box 944212, Sacramento,
CA, 94244-2120

BioWP-2345E14

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 327

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

August 26, 1998
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

Re: Request for Specific Work Plan for Removal of Free Product and Introduction of Oxygen and Bioparameters for 2345 E. 14th St., Oakland CA 94601

Dear Mr. Wong:

The October 20, 1997 Remedial Action Plan provided by Tank Protect Engineering (TPE) evaluated a number of remediation approaches for the above site. These included pump and treating groundwater, installation of a collection/remediation trench, monitoring and "assumed natural bioremediation" and installation of a remedial well along with enhanced bioremediation through addition of chemicals into this well. This last approach was selected by TPE as the most cost effective approach. However, to date, no attempt to proceed through this approach has been done. In fact, only monitoring has been done, which was determined not to be the recommended approach due to the increasing concentration trends found in the wells. Such increase of petroleum in groundwater is seen in July 27, 1998 monitoring event.

Our office agrees, in theory, with the enhanced bioremediation approach. At this time, you should have your consultant provide a work plan which proposes the introduction of sufficient amounts of oxygen and any other supplements necessary to treat the amount of petroleum determined to be dissolved beneath this site. Along with your work plan, please provide a printout of the estimation of amount of supplements needed and an estimate of the mass of petroleum in the release. Additionally, any well, which has detected free product in the past, should be fitted with a passive free product removal device.

Prior to do the above, you will need to test the existing wells for the appropriate bioremediation parameters mentioned in my April 29, 1998 letter ie dissolved oxygen, oxidation-reduction potential, alkalinity, nitrate, sulfate and ferrous iron. Please evaluate these concentrations at the site and include the evaluation as justification as to the amounts of supplements to be added to groundwater at the site.

This work should be done prior to the next quarterly monitoring event. The Cleanup Fund is copied with this letter to notify them of the County's directives. The failure to perform this proposed and approved work may be grounds for deeming the site "non-compliant" and jeopardizing reimbursement funding.

Please submit your work plan within 30 days or by September 28, 1998.

Mr. Stanley Wong
StID # 2116
2345 E. 14th St.
August 26, 1998
Page 2.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. Richard Dreessen, TPE, 2821 Whipple Rd., Union City CA 94587-1233

Mr. A. Rambach, SWRCB Cleanup Fund, P.O. Box 944212, Sacramento, CA 95814

ImpRAP2345

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Business Name
in Envision:
"Taxi Taxi Inc."

RO#327

April 29, 1998
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

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

**Re: Remedial Action Plan for Credit World Auto Sales, 2345 E. 14th
St., Oakland CA 94601**

Dear Mr. Wong:

It is necessary at this time to request the implementation of active remediation at the above site. It is clear that current site conditions **do not** meet the guidelines of a "low risk" groundwater contaminated site as described by the Regional Water Quality Control Board (RWQCB) and therefore something **more** than groundwater monitoring is necessary. A low risk site requires containment of the groundwater plume, however, groundwater petroleum contamination has likely moved off-site in the southwest direction. A low risk site requires a stable or decreasing concentration in the groundwater plume, however, elevated levels of TPHg, BTEX and MTBE continue to be found in all wells except TMW-4. A low risk site requires that the source of contamination be removed or remediated, however, free product or sheen continues to be found in wells at the site. Because these conditions exist, it is premature to perform a human health risk assessment.

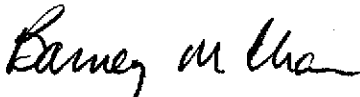
In addition, your consultant has not yet analyzed the monitoring wells for the bioremediation parameters as requested in my June 12, 1997 letter. Therefore, you are requested to add the parameter previously requested, dissolved oxygen, oxygen-reduction potential, alkalinity, nitrate, sulfate and ferrous iron to your quarterly groundwater sampling **immediately**. You should also provide a work plan for the introduction of oxygen into groundwater to enhance aerobic bioremediation. You may design your work plan by using the recommendations of the provider or the oxygen releasing compound. Please verify the effectiveness of the oxygen releasing compounds at a site such as this where free product may exist. Please provide your work plan to our office **within 30 days or by May 29, 1998**. Keep in mind, our office has requested the analysis of the bioremediation parameters and the submission of a work plan previously in my June 12, 1997 letter, without success. In order to move forward towards site closure, you must meet the requirements of a **low risk site**. Monitoring only at this time is **not sufficient**.

Mr. Stanley Wong
StID # 2116
2345 E. 14th St.
April 29, 1998
Page 2.

In addition, our office, at this time does not believe that the installation of the proposed extraction well or the advancement of additional off-site borings is necessary.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. L. Huckins, TPE, 2821 Whipple Rd., Union City, CA 94587
Mr. A. Rambach, SWRCB Cleanup Fund, P.O. Box 944212, Sacramento
CA, 95814

2bio2345

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



- TAXI TAXI INC.

RO# 327

September 2, 1997
StID# 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

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

**Re: Remedial Action Plan for former Credit World Auto Sales
2345 E. 14th St., Oakland CA 94601**

Dear Mr. Wong:

Our office last wrote to you in my June 12, 1997 letter where I requested the additional analysis for natural biodegradation parameters and the submittal of a work plan to introduce appropriate supplements to enhance bioremediation. Upon receipt of the August 12, 1997 Second Quarter Report, it appears that these additional analyses and work plan have not been addressed.

The Second Quarter report also states a number of troubling items which include:

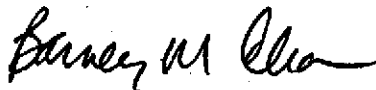
- * the presence of free product in three wells again and the significant increase of free product in MW-1 (4 feet);
- * the presence of debris on MW-5, therefore, not allowing sampling or groundwater elevation readings on this well;
- * an easterly gradient was found for the first time due to the absence of data for MW-5;
- * the reporting of 0.04' free product in TMW-4 when no TPHg, MTBE or BTEX has ever been detected in this well; and
- * the failure to include 6/28/97 analyses data on the summary of groundwater Table 4.

Please institute free product removal from those impacted wells by either a manual or automated skimmer device. Please include the analysis of the bioindicator parameters mentioned in my June 12, 1997 letter and suggest any supplements based upon these results. Please submit the previously requested work plan for the introduction of supplements to groundwater within 30 days or by October 3, 1997. You are reminded that when groundwater conditions have stabilized, a human health risk assessment will be required.

Mr. Stanley Wong
2345 E. 14th St.
StID # 2116
September 2, 1997
Page 2.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
Mr. F. Moss, TPE, 2821 Whipple Rd., Union City, CA 94587
Mr. A. Rambach, SWRCB Cleanup Fund, P.O. Box 944212,
Sacramento, CA 95814

wpbio2345

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



TAXI TAXI INC.

RO# 327

June 12, 1997
StID# 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

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

**Re: Site Assessment Report for former Credit World Auto Sales
2345 E. 14th St., Oakland CA 94601**

Dear Mr. Wong:

Our office has received and reviewed that June 3, 1997 **Site Assessment Report** for the above site. This report gives the soil and groundwater results of the recent borings (SB-1 through SB-5). The results of this investigation indicate that the extent of soil and groundwater contamination is limited to the general area within and around the former underground tanks. It appears, as is believed in typical fuel release cases, that the extent of the release to soil and groundwater is limited and has not traveled beyond 160 feet downgradient of the release.

The report also provides the groundwater monitoring results for the March 1997 sampling event. Free product was not detected in any of the wells, perhaps reflecting the effect of the considerable removal and remediation of gasoline contaminated soil.


Consistent with the recommendations of the Lawrence Livermore National Lab (LLNL) study, the preferred remedial approach at the typical site is to verify and enhance, if necessary, conditions conducive to natural bioremediation. You should, therefore, include in all future monitoring events, results for the analysis of the following natural biodegradation parameters: dissolved oxygen, oxygen-reduction potential, alkalinity, nitrate, sulfate and ferrous iron (Fe +2). I agree that quarterly monitoring should continue.

Please provide a work plan which recommends the introduction of appropriate supplements to enhance bioremediation. This can be done through the advancement of additional vertical probes or wells or casings etc. within the contaminant plume. Based upon the existing chemicals detected, you can determine which ones to add to enhance biodegradation. At this point, groundwater extraction is not recommended as it has proven not to be cost effective.

Mr. Stanley Wong
2345 E. 14th St.
StID # 2116
June 12, 1997
Page 2.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
Mr. L. Huckins, TPE, 2821 Whipple Rd., Union City, CA 94587
Mr. A. Rambach, SWRCB Cleanup Fund, P.O. Box 944212,
Sacramento, CA 95814

bio2345

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



TAXI TAXI INC
2345 INTERNATIONAL
OAKLAND, CA BLVD

RO# 327

March 6, 1997
Certified Mailer # P112 479 091

Mr. Jayanti Nathu
Camelot Inn
2508 I 40 East
Amarillo, TX, 79103

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

**Re: Request for Access to Install Environmental Boring/Monitoring
Well on 2321 E. 14th St., Oakland CA 94601**

Dear Mr. Nathu:

Our office has been overseeing the on-going subsurface investigation of a petroleum fuel release at a site located at 2345 E. 14th St. in Oakland, California. This site is located just southeast of 2321 E. 14th St. and upgradient based on groundwater flow direction. During the course of the investigation of this site, it appears that there is a potential of petroleum groundwater contamination migrating beneath the Mitchell Hotel site. Therefore, our office has requested that Mssrs. Aaron and Stanley Wong, owners of the 2345 E. 14th St. property, install an offsite boring and/or well on the Mitchell Hotel property in order to determine the extent of the petroleum contamination in groundwater, if any. I have been informed that you have been notified of this request by Mr. Lee Huckins, consultant for Mssrs. Wong. This letter confirms the County's position that this offsite is necessary to determine the limit of the fuel release from the 2345 E. 14th St. property.

Please be advised that as the local implementing agency delegated by the Water Board to oversee the remediation of sites which have experienced fuel releases from underground tanks, the investigation and cleanup of said sites must be consistent with the provisions of Title 23, California Code of Regulations and the Porter-Cologne Water Quality Control Act (Water Code). Specific to the Water Code, Resolution No. 92-49 has been published by the State Water Resources Control Board which states the **Policies and Procedures for the Investigation of Discharges to the Water**. Within this policy the discharger, in this instance Mssrs. Wong's property, is required to extend the investigation and cleanup to **any** (bold added) location affected by the discharge or threatened discharge. The Regional Water Board has the authority to require uncooperative landowners and tenants of affected property to cooperate or, if necessary, to participate in investigation, cleanup and abatement.

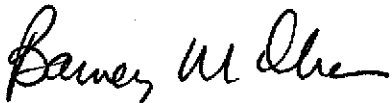
Ms. Jayanti Nathu
2321 E. 14th St.
March 6, 1997
Page 2.

Our office recommends your cooperation with Mssrs. Wong in allowing them access to the Mitchell Hotel property, specifically the rear of 2321 E. 14th St., for the purpose of installing an offsite boring or monitoring well. Should this access be denied, you may be requested to perform your investigation at your own expense. Based upon the results of the initial boring, it will be determined whether a permanent well is required.

Should you not be able to resolve this issue, our office will request your presence at a hearing in the presence of the Alameda County District Attorney's office.

Please contact me at (510) 567-6765 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: Mssrs. Wong, 2200 E. 12th St., Oakland CA 94606
Mr. L. Huckins, Tank Protect Engineering, 2821 Whipple Rd.,
Union City, CA 94587-1233
Bob Chambers, Alameda County District Attorney Office
B. Chan, file
Acc2321

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



"TAXI TAXI INC."

RO#327

February 10, 1997
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

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

Re: Addendum to August 4, 1995 Workplan for Credit World Auto Sales, 2345 E. 14th St., Oakland CA 94601

Dear Mr. Wong,

Our office has received and reviewed the February 7, 1997 work plan addendum to the August 4, 1995 workplan previously reviewed by the County. Changes in number and locations of borings have been made from the original work plan. A total of five (5) Geoprobe borings have been proposed. Both soil and groundwater samples will be taken from each boring for chemical analysis.

Our office approves this work plan with the following conditions:

1. Please consider relocating soil boring SB-2 approximately 25' to the southwest of the proposed location. The area south of MW-1, where the original SB-2 is proposed, has been previously characterized by boring TH-5, while the area southwest of MW-1 is within the one-time downgradient direction of MW-1.
2. Though not mentioned in the addendum, please analyze the samples for TPHg, BTEX and MTBE.
3. Please contact me at least 72 working hours prior to your field work so I may arrange to be present if possible.

After this investigation, you should be prepared to propose the installation of additional permanent wells, if necessary, and perform a Tier 1 Human Health Risk Assessment according to ASTM RBCA methodology.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
Mr. L. Huckins, TPE Inc., 2821 Whipple Rd., Union City, CA
94587-1233

wpad2345

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



TAXI TAXI INC.

RO# 327

October 3, 1996
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

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

**Re: Status of Subsurface Investigation at 2345 E. 14th St.,
Oakland CA 94601, Former Taxi Taxi**

Dear Mr. Wong:

This letter serves to recount a recent conversation with Mr. Lee Huckins of Tank Protect Engineering (TPE). Among the items discussed was the continued offsite investigation at the above site. The overexcavation activities has delayed the offsite investigation proposed in TPE's August 4, 1995 workplan. I would like to inform you of the significant items of our conversation as well approve and request implementation of the offsite investigation.

At this time, no further soil excavation is requested. I am aware that soil contamination may still exist in the northern portion of the property, however, offsite investigation should be performed prior to any additional soil excavation.

Monitoring well TMW-5 was being considered for closure since it had been damaged during the excavation activities. It was decided that this well should remain since it is nearest the source of the release and could be used in future remediation.

Your consultant was requested to investigate the various options for free product removal and implement an appropriate one. Several of the monitoring wells have consistently detected free product, therefore, a removal system must be implemented as soon as possible.

In regards to the previously proposed offsite investigation, the proposal to install up to nine offsite borings is accepted by our office. Please be aware that since the August 1995 proposal date, additional boring techniques are commonly in use. Therefore, you are encouraged to use any of the rapid site assessment techniques ie Geoprobe, Hydropunch etc. In addition, you should begin your offsite investigation radially outward from the former tank pit area. The extreme borings on E. 14th St. and Miller Ave. should be done only if necessary. Based on the boring locations, permits will be required to gain drilling access. Please initiate the permit procedures as soon as possible. You should also be aware that offsite monitoring wells

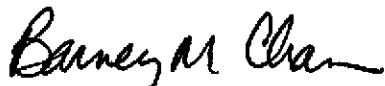
Mr. Stanley Wong
StID # 2116
2345 E. 14th St.
October 3, 1996
Page 2.

will be required to determine the extent of the groundwater plume. You may want to consider installing permanent wells immediately after the initial investigation so this could be done under the same permit.

Please include a status of the above items in your future quarterly monitoring reports.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: Mr. L. Huckins, TPE, 2821 Whipple Rd., Union City, CA 94587
B. Chan, files

ssi2345

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0327

RAFAT A. SHAHID, DIRECTOR

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

October 26, 1995
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland, CA 94606

Re: Comment on August 4, 1995 Work Plan for Soil and Groundwater
Investigation at 2345 E. 14th St., Oakland CA 94601

Dear Mr. Wong:

Our office has received and reviewed the above report as prepared by your consultant, Tank Protect Engineering. This work plan calls for the advancement of nine borings to groundwater and the sampling of both selected soil and grab groundwater samples in an attempt to verify the horizontal limits of the gasoline contamination from the former underground storage tanks. This work plan is accepted and field work may commence as soon as possible. Please note that borings SB-6 and SB-1 may not be necessary if the borings closer to the site indicate that the petroleum plume has been defined.

Based on the results of these borings you should prepare a work plan for the installation of additional well(s) to define the limits of the petroleum plume.

Please contact me at least 48 hours prior to your field activities. I may be reached at (510) 567-6765.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Barney M. Chan'.

Barney M. Chan
Hazardous Materials Specialist

cc: L. Huckins, Tank Protect Engineering, 2821 Whipple Rd.,
Union City, CA 94587-1233
G. Coleman, files
wp2345

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0327

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

May 17, 1995
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

**Re: Status of Subsurface Investigation at 2345 E. 14th St.,
Oakland CA 94601, Former Taxi Taxi**

Dear Mr. Wong:

Thank you for the submission of the May 3, 1995 quarterly monitoring report for the above site. Currently, the excavated soil from the site has been treated and sampled. Upon verifying successful treatment, this soil is proposed for reuse.

The continuing detection of both floating petroleum product and high dissolved levels of gasoline in monitoring wells at this site will require immediate action. The California Underground Tank Regulations, Title 23, Division 3, Chapter 16, Section 2655 requires the removal of free product to limit the spread of such contamination into previously uncontaminated zones. Because of this, you should inform our office what steps are being done to remove free product on a regular basis. You should also update your quarterly monitoring reports with the total cumulative volume or pounds of free product which have been removed from this site.

Based on the groundwater contamination being detected, additional groundwater investigation must be performed to determine the extent of such contamination. Either temporary or permanent subsurface investigation may be performed, however, the installation of permanent monitoring wells will be required to verify the limits of the hydrocarbon plume.

It is agreed that one would expect decreasing levels of contamination in groundwater due to the excavation of the contaminated soils, but the immediate removal of free product is a priority.

You should also investigate the types of remedial actions available for this site. This is done in the form of a feasibility study which examines at least two alternatives to restore or protect the beneficial uses of the groundwater beneath this site. The alternative should also propose cleanup levels for soil and groundwater.

Mr. Stanley Wong
StID # 2116
2345 E. 14th St.
May 17, 1995
Page 2.

Your immediate comment regarding the removal of free product is requested **within 30 days or by June 19, 1995**. A work plan for additional groundwater investigation should be submitted with your next groundwater monitoring report ie June 1995. Based on the levels of groundwater contamination being found at that time, a feasibility study should be submitted. Please have your consultant mention their remedial alternatives in your next groundwater monitoring report.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: J. Mrakovich, TPE, 2821 Whipple Rd., Union City, CA
94587-1233

B. Raynolds, files

add2345

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RO# 327

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

January 25, 1995
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

**Re: Review of Work Plan for Stockpiled Soil Remediation at
2345 E. 14th St., Oakland CA 94601, Credit World Auto Sales**

Dear Mr. Wong:

Our office has received and reviewed the January 24, 1995 report prepared by Tank Protect Engineering. Recall this report details the history of the above site, gives the results of recent confirmatory soil samples after overexcavation and proposes to chemically treat for reuse the excavated stockpiled soils.

I have discussed the work plan with Mr. John Mrakovich of TPE and it is acceptable. Work may proceed as soon as possible. Please contact me at least **48 hours prior to initial soil sampling** so I may arrange to be present to witness this work, if possible.

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

Sincerely,

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

Barney M. Chan
Hazardous Materials Specialist

cc: J. Mrakovich, Tank Protect Engineering, 2821 Whipple Rd.,
Union City, CA 94587

E. Howell, file
wpsp2345

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0327

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

September 7, 1994
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

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

**Re: Comment on August 26, 1994 Work Plan for the Excavation of
Soil and Installation of Monitoring Wells at 2345 E. 14th
St., Oakland CA 94601.**

Dear Mr. Wong:

Our office has received and reviewed the above referenced work plan as prepared by your consultant, Tank Protect Engineering (TPE). Recall, this work plan calls for the excavation of soils around the former underground tank pit, the extraction of groundwater from the pit and the installation of three additional monitoring wells. After discussion with Mr. John Mrakovich of TPE, it was agreed that you should initiate the overexcavation and groundwater extraction as soon as possible. Please contact our office at least **48 working hours** prior to your field work so we may be present to witness any confirmatory soil sampling.

It was noted that groundwater extraction should be done if there is **any** evidence of petroleum contamination. The high concentration of gasoline and BTEX detected in monitoring well TMW-5 indicates the likelihood of encountering contaminated groundwater during the excavation. Bioremediation of groundwater within the pit and within the existing wells was also discussed. Our office will confer with the RWQCB to see if any permitting requirements exist. We will inform your consultant with our findings.

In regards to the location of the additional monitoring wells, it was agreed that it would be best to see what affect the soil excavation and groundwater extraction has on the existing wells prior to committing to the additional well locations. With this in mind, the installation of the additional wells will be put on hold. You may contact me at (510) 567-6765 should you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: J. Mrakovich, TPE, 2821 Whipple Rd., Union City CA 94587-1233
E. Howell, files wpap2345

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0327

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

August 4, 1994
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

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

NOTICE OF VIOLATION

Re: Request for Work Plan Addendum for the Further Investigation and Remediation of 2345 E. 14th St., former Taxi Taxi

Dear Mr. Wong:

Our office has received and reviewed the July 29, 1994 report prepared by Tank Protect Engineering (TPE). This report indicates that significant groundwater contamination still exists on this site and potentially offsite. Remediation of this contamination must be initiated immediately. Certainly, the free fuel product being found in monitoring wells MW-1 and MW-2 must be removed on a regular basis as required by Section 2655 of Article 5, Chapter 16 of the Underground Storage Tank Regulations. Please describe what will be done to satisfy this requirement.

Recall, the November 4, 1993 Preliminary Site Assessment (PSA) for this site prepared by TPE recommended the following future actions:

- a. Limited overexcavation of contaminated soils and possible removal of contaminated water from the excavation pit;
- b. Installation of three additional monitoring wells and
- c. Institute quarterly groundwater monitoring.

Our office agreed with this approach and requested that a specific work plan be submitted to perform this work by **March 21, 1994**. Although quarterly monitoring has been initiated, our office has not received the specific work plan. Please submit the requested report to our office **within 30 days or by August 8, 1994**. This report should also include a time schedule for implementation.

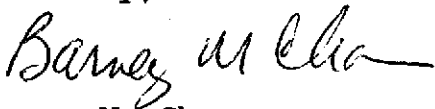
You are reminded that this letter constitutes a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit and complete the work plan may subject you to civil liability.

Please be aware that our offices have recently moved to:
1131 Harbor Bay Parkway, Room 250, Alameda CA 94502.

Mr. Stanley Wong
StID # 2116
2345 E. 14th St.
August 4, 1994
Page 2.

You may reach me at (510) 567-6700 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
J. Mrakovich, Tank Protect Engineering, 2821 Whipple Rd.,
Union City, CA 94587-1233
E. Howell, files

NOV2345

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0327

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

February 18, 1994
StID # 2116

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

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

**Re: Comment on November 4, 1993 Preliminary Site Assessment
Report for 2345 E. 14th St., Oakland CA 94601, Credit
World Auto Sales**

Dear Mr. Wong:

Our office has recently received and reviewed the above report as prepared by your consultant, Tank Protect Engineering. This report describes the results of the installation of two additional monitoring wells plus the sampling of all five wells. The conclusion of the report states that considerable groundwater contamination exist beneath this site. In fact, 0.77 feet of free product was found and removed from monitoring well, MW-1, on 8/17/93. Considerable soil contamination also exists in soil near the groundwater depth, the capillary zone.

Tank Protect recommends initiating quarterly groundwater monitoring of all wells at this site. They also recommend the removal of contaminated soils within the original tank pit location and possibly around MW-2 and the installation of three additional monitoring wells. Contaminated groundwater pumping may also be done at that time. Our office agrees with their recommendations and this work would be best done in a phased approach. We understand that the initial phase would be the excavation of the tank pit area. You recently gave me a copy of Tank Protect's proposal. This makes sense since when the tanks were initially removed there was no attempt to perform any overexcavation of contaminated soils. Removal of such soils and contaminated water would likely reduce the contamination within the groundwater beneath this site, which is our ultimate goal.

The groundwater gradient has been shown to vary due to the irregular soils pattern beneath the site. Because of this varying gradient, a large portion of the site has been impacted by the gasoline contamination. You may choose to address the soil contamination by treating the groundwater, but it has not been determined whether groundwater extraction is a viable remediation method for this site.


Mr. Stanley Wong
StID # 2116
2345 E. 14th St.
February 18, 1994
Page 2.

The three additional monitoring wells have been proposed in locations which are meant to determine the extent of soil and groundwater contamination. These wells, though important and necessary, may be installed after the initiation of some type of active remedial approach. Quarterly groundwater monitoring should be performed until any change has been agreed to by our office or the Regional Water Quality Control Board, (RWQCB).

In any event, in order to proceed with the investigation, you should provide a specific work plan addendum to our office within 30 days or by March 21, 1994, which details your next investigation step.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: L. Huckin, Tank Protect Engineering, 2821 Whipple Rd., Union
City, CA 94587
E. Howell, files

4-2345E14

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0327

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 1, 1994
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

**Re: Request for Technical Reports for 2345 E. 14th St., Oakland
CA 94601, former Taxi Taxi Site.**

Dear Mr. Wong:

As you are aware, two monitoring wells were installed at the above site in June of 1993 by Tank Protect Engineering (TPE) as the initial step of resuming the subsurface investigation of the petroleum fuel release. From previous soil and water samplings, it was apparent that considerable fuel contamination still exists at this site. Up to two automated free product removal systems were also to be installed in the wells exhibiting free product. As of this date, our office has not received the report detailing the installation of these wells and the sampling of up to five monitoring wells. You should also be aware that our office requires quarterly monitoring of these wells, therefore such monitoring should have occurred in October of 1993 and in January of 1994. The results of these monitoring events should be sent to our office in the form of a report, signed and stamped by the registered professional of your consultant.

Please provide all the above technical reports to our office within 15 days or by February 18, 1994. You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the requested reports may subject you to civil liability.

Keep in mind that the complete characterization of this site along with quarterly monitoring is required before our office can make any recommendation for site closure. You should contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: L. Huckin, Tank Protect Engineering, 2821 Whipple Rd., Union
City, CA 94587

E. Howell, files
Req-2345E14

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0327

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

June 25, 1993
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

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

**Re: Comment on June 18, 1993 Workplan for Construction of
Groundwater Monitoring Wells at 2345 E. 14th St., Oakland
CA 94601, formerly Taxi Taxi**

Dear Mr. Wong:

Our office has received and reviewed the above referenced report as prepared by your consultant, Tank Protect Engineering, TPE. Recall, this workplan calls for the installation of two monitoring wells, one upgradient to the site and the other downgradient to and close to the former fuel tank pit. The workplan also calls for the installation of up to two automatic free product removal systems within chosen monitoring wells. This workplan is acceptable as work should proceed on the condition that:

1. Our office is contacted 48 working hours prior to monitoring well installation so we may witness this activity.
2. Please provide the data sheets describing the free product removal system to be installed in the wells.

Please be aware that our office has yet to receive the information requested in my October 19 and October 30, 1993 letters. Recall, the October 19th letter requested information regarding the manifests and disposal records for the tank, piping and stockpiled soils, plus any information regarding sampling beneath the piping run. The October 30th letter gave a reporting format for all future reports. In particular, it requested a site map delineating contamination contours for soil and groundwater based on the most recent information, historical records of groundwater gradient and a tabulation of all previous monitoring event results.

You should also be aware that the installation of the two wells described in the workplan does not constitute the full characterization of the extent of soil and groundwater contamination nor does the installation of free product recovery systems represent adequate remediation of the site. The Site Assessment Report (SAR), to be prepared by TPE, should give your next steps intended to fully characterize the site and investigate your remedial options. This might include additional borings, a soil-gas survey, pump tests etc.

Mr. Stanley Wong
2345 E. 14th St.
StID # 2116
June 25, 1993
Page 2.

Please provide the requested information of the October 19th letter **within 30 days or by July 26, 1993**. In addition, your future monitoring reports should include the information requested in my October 30th letter.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the reports may subject you to civil liabilities.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
J. Mrakovich, Tank Protect Engineering, 2821 Whipple Rd.,
Union City, CA 94587-1233
E. Howell, files

3-2345E14

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0327

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 13, 1993
StID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

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

NOTICE OF VIOLATION

**Re: Request for Work Plan for Further Subsurface Investigation
at 2345 E. 14th St., Oakland CA 94601, former Taxi Taxi.**

Dear Mr. Wong:

When we last met on January 28, 1993 at my office, you requested my opinion on three work plan proposals from three consultants, each proposing different options. I was hopeful that you would be able to make a decision as to which proposal would be the most economical and efficient to investigate and remediate the above site. In addition, you were sent two letters on October 19, 1993 and October 30, 1993 which requested information outlined in comments #1-5 in the October 19th letter along with a work plan proposal for further investigation. To this date, our office has not received any of the requested documents and information. I have, however, been informed verbally that you have decided on one of the work plan proposals.

Please provide the requested work plan proposal and a reply to the five comments in my October 19, 1993 letter **within 30 days of receipt of this letter or by June 15, 1993**. Included in the work plan should be a timetable for the implementation of the various actions.

You are reminded that failure to submit the requested documents is a violation of both the California Water Code and the California Health and Safety Code and may subject you to civil liabilities.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiett, RWQCB
E. Howell, files
NOV-2345E14

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0327

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

October 30, 1992
STID # 2116

Mr. Stanley Wong
2200 E. 12th St.
Oakland CA 94606

Re: Subsurface Investigation at Former Taxi Taxi at 2345
E. 14th St., Oakland CA 94601

Dear Mr. Wong:

Thank you for the submission of the two reports regarding the above site which you delivered to our office on October 28th. These reports include the **Phase I Soil and Ground Water Assessment** by Earth Systems Environmental, Inc. and the **Groundwater Monitoring Report** dated May 1, 1992 performed by NKJ Environmental Monitoring in behalf of Mr. Jeff Johnson. Our office has completed the review of these reports. As you are aware through our office meeting, more work will be required to determine the extent of and remediate the soil and groundwater contamination.

After reviewing the reports, the first observation reached is that the groundwater contamination appears to be severe. When the wells were initially installed in August 1991 there was high concentrations of Total Petroleum Hydrocarbons as gasoline (TPHg) and high concentrations of Benzene, Toluene, Ethylbenzene and Xylenes (BTEX) in MW-1 only. The next monitoring event in April of 1992 showed floating product on all three wells and as much as 5.12 feet in MW1. Our office agrees with what is recommended in this report. Some type of product removal is necessary immediately. Manual removal may be done only as an interim measure while the extent of the groundwater contamination is being determined and while a remediation system is being developed.

Earth Systems Environmental recommends the installation of two additional monitoring wells, one up-gradient and one down-gradient to help define the extent of the groundwater plume. These locations are acceptable but it will be necessary to perform additional site assessment to identify all additional location(s) requiring monitoring wells.

Mr. Stanley Wong
2345 E. 14th St.
STID #2116
October 30, 1992
Page 2.

Be aware that the items 1-5 requested in my October 19, 1992 letter must still be provided by **December 3, 1992**. Your consultant will be able to provide the requested information and adequately reply to my questions.

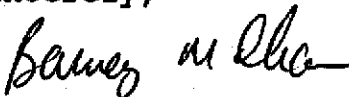
Because of the results of the recent reports provided, your response should also identify the method by which free product in the wells will be removed and provide a workplan which will define the extent of soil and groundwater contamination. Please also provide a description of the groundwater remediation systems which you are considering for treating the contaminated groundwater. You should also provide a time schedule for the design, permitting and construction of the proposed remedial system.

Your subsequent quarterly monitoring reports should include the following information:

- * detail the work which has been performed the preceding quarter and that which is proposed for the next quarter
- * a site map delineating contamination contours for soil and groundwater based on the most recent data
- * historical records of groundwater elevations in all wells
- * a tabulation of the analytical results from all previous monitoring events

You may contact me at (510) 271-4350 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiett, RWQCB
E. Howell, files

2add2345

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0327

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

April 23, 1991

Mr. Aaron Wong
2200 East 12th Street
Oakland, CA 94601

RE: Remediation measures for 2345 East 14th Street, Oakland

Dear Mr. Wong:

Enclosed is a copy of the request from our office for you to submit a work plan to address a soil and ground water investigation. Please note that this request is dated August 2, 1989.

Please submit a workplan that will describe the site investigation activities proposed for the above referenced site within 30 days of the date of this letter. Please note that you have had 20 months to prepare a workplan. We will require any extension requests to be submitted to our office in writing.

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

Sincerely,

Cynthia Chapman

Cynthia Chapman
Hazardous Materials Specialist

c: Mr. Gil Jensen, Alameda County District Attorney
Mr. Lester Feldman, Regional Water Quality Control Board

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0327

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

October 19, 1992
STID # 2116

Mssrs. Aaron and Stanley Wong c/o
2200 E. 12th St.
Oakland CA 94606

Re: Request for Report of Subsurface Investigation and
Workplan Addendum for former Taxi Taxi, Inc. at
2345 E. 14th St., Oakland CA, 94601.

Dear Mssrs. Wong:

Please be advised that the oversight of the remediation of the above site has been transferred to the Local Oversight Program (LOP) section of the Alameda County Hazardous Materials Division. You have been notified of this through a "Notice of Requirement to Reimburse" letter recently sent to you. The new case handler is the undersigned Hazardous Materials Specialist.

Upon review of the files, it appears that additional work will be required to further delineate the soil and groundwater contamination.

As you may recall, upon the removal of the four underground tanks at this site on 8/25/88, results of soil samples indicated high gasoline (up to 1500 parts per million, ppm) and Benzene, Toluene, Ethylbenzene and Xylenes (BTEX) around the gasoline tanks and elevated total oil and grease (TOG) in soil samples at the ends of the former waste oil tank. An initial investigation was performed by California Environmental Consultants, CEC, through the request of Mr. Dino Gonis. This investigation consisted of sampling of stockpiled soils and drilling three borings along with analyzing three grab groundwater samples from these borings. The results of this investigation indicated high dissolved gasoline and BTEX in the groundwater samples taken in the assumed downgradient direction to the gasoline tanks and elevated dissolved oil and grease in the grab water sample downgradient to the former waste oil tank pit.

Following this, Earth Systems Environmental, Inc. prepared a workplan dated May 28, 1991. This workplan called for seven additional borings and converting two of the borings into groundwater monitoring wells. Apparently, monitoring well 1, MW-1, was installed on May 22, 1991 when a drilling rig was conveniently available in this area.

Messrs. Wong
STID # 2116
2345 E. 14th St.
October 19, 1992
Page 2.

I have recently spoken with Mr. Mark Magargee of Earth Systems Environmental and he informed that the work outlined in this workplan has been performed and that a report has been issued detailing the results. Be aware that our office has not received a copy of this report. Please send our office a copy within 10 days of receipt of this letter. In the same conversation with Mr. Margargee, he stated that MW-1 had free product in it. An immediate interim measure must be performed to remove all free product from this well on a regular basis. Bailing is not an acceptable means. Your workplan addendum should state what measure will be done to comply with this request.

In the initial request for a workplan, sent to you by Mr. Ariu Levi in his 8/2/89 letter, he included a general guideline for your workplan. Upon review of the status of this site, you should provide comment to the following County concerns:

1. Please provide copies of manifests for all hazardous waste including tanks, piping, rinsate and sludge which was offhauled from the site.
2. Please document the disposal or reuse of all non-hazardous stockpiled soils generated from the tank removals.
3. No information was given concerning piping associated with the tanks. Please detail the fate of all piping existing at the site.
4. No information was given regarding any remedial activities performed at the time of the tank removals. Because of this, contamination in excess of 1000 ppm likely still exists in the soils. Please describe your method for determining the lateral and vertical extent of soil and groundwater contamination. This may include soil borings, soil gas survey, etc. Describe the rationale for the location of all borings and monitoring wells. Given the assumed westerly groundwater gradient and the existence of free product in MW-1, an additional well(s) will be needed to delineate the extent of the groundwater contaminant plume. Please keep in mind that priority should be given to prevent off-site migration of contamination.
5. You should commence groundwater elevation readings, sampling and analysis immediately and continue on a quarterly basis until this site is recommended for site closure to the Regional Water Quality Control Board (RWQCB).

Messrs. Wong
STID # 2116
2345 E. 14th St.
October 19, 1992
Page 3.

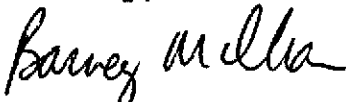
Please provide a written response to the above comments along with your workplan addendum to our office within **45 days** of receipt of this letter.

Please submit copies of all reports, analytical results and workplans to our office and to that of the RWQCB to the attention of Mr. Rich Hiett. Their address is 2101 Webster St., Suite 550, Oakland CA 94612. You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the requested document may subject you to civil liabilities.

Please also be aware that failure to submit the requested document may also be considered the improper closure of an underground tank. Section 25299 of the California Health and Safety Code (CH&SC) allows for the civil penalty of not less than \$500 or more than \$5000 for each underground tank for each day which that operator or owner fails to properly close an underground tank as required by Section 25298. Thus failure to submit the requested documents may subject you to both civil liabilities as well as referral of this case to the District Attorney Office for enforcement.

You may contact me at (510) 271-4350 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiett, RWQCB
E. Howell, files

Add-2345

8H

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0327

Certified Mail P 833 981 503

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415) 271-4320

August 2, 1989

Mr. Aaron Wong
2200 E. 12th Street
Oakland, CA 94106

Subject: Unauthorized Release
Removal of Underground Fuel and Waste Oil Tanks
Taxi Taxi,
2345 E. 14th Street,
Oakland, CA 94606

Dear Mr. Wong:

Thank you for submitting the results for analysis of subsurface soil and ground water samples taken in response to the underground tank removals from the above shown facility. Because of the degree of contamination found, this facility is considered to have experienced a confirmed release of petroleum hydrocarbons that has impacted subsurface soil and ground water. The extent of this contamination must be assessed and remediated.

Our office will be the lead agency overseeing both the soil and groundwater remediation of this site. The Regional Water Quality Control Board (RWQCB) is currently unable to oversee the large number of contamination cases within Alameda County and has delegated the handling of this case to our Division. We will be in contact with the RWQCB in order to provide you with guidance concerning the RWQCB's remediation requirements. However, please be aware that you are responsible for diligent actions to protect waters of the State.

To complete contaminant assessment and begin remediation, we require that you submit a work plan which, at a minimum, addresses the items listed below and presents a timetable for their completion. Please submit this workplan within 30 days of the date of this letter.

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I. Introduction

- A. Statement of scope of work
- B. Site map showing location of past underground storage tanks and lifts
- C. Site History
 - provide historical site use and ownership information. Include a description of types and locations of hazardous materials used on site.

II. Site Description

- A. Vicinity description including hydrogeologic setting
- B. Initial soil contamination and excavation results
 - provide sampling procedures used
 - indicate depth to ground water
 - describe soil strata encountered
 - provide soil sampling results, chain of custody forms, identity of sampler
 - describe methods for storing and disposal of all soils

III. Plan for determining extent of soil contamination on site

- A. Describe approach to determine extent of lateral and vertical contamination
 - identify subcontractors, if any
 - identify methods or techniques used for analysis
 - provide sampling map showing all lines of excavation and sampling points
 - if a step out procedure is used, define action level for determination of "clean" isopleth
 - provide chain of custody forms, lab analysis results, all receipts and manifests, & identity of sampler
- B. Describe method and criteria for screening clean versus contaminated soil. If onsite soil aeration/bioremediation is to be utilized, then provide a complete description of method that includes:
 - volume and rate of aeration/turning
 - method of containment and cover
 - wet weather contingency plans
 - permits obtained
- C. Describe security measures

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IV. Plan for determining ground water contamination

- Construction and placement of wells should adhere to the requirements of the "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks". Provide a description of placement and rationale for the location of monitoring wells including a map to scale.
- The placement and number of wells must be able to determine the extent and magnitude of the free product and dissolved product plumes.

A. Drilling method for construction of monitoring wells

- expected depth and diameter of monitoring wells
- date of expected drilling
- casing type, diameter, screen interval, and pack and slot sizing techniques
- depth and type of seal
- development method and criteria for adequacy of development
- plans for cuttings and development water

B. Ground water sampling plan

- method for free product measurement, observation of sheen
- well purging procedures
- sample collection procedures
- chain of custody procedures
- procedures for determining ground water gradient

D. Sampling schedule

- measure free product weekly for first month following well installation
- measure free product and dissolved constituents monthly for first three months.
- after first three months monitor quarterly.
- monitoring must occur a minimum of one year.

V. Provide a site safety plan

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VI Development of a remediation Plan.

- A. The remediation plan is to include a time schedule for remediation, and, at minimum, must address the following issues:
- removal of all free product. Manual bailing is not acceptable as a recovery system. Actual amount of free product removed must be monitored and tabulated.
 - remediation of contaminated soils and dissolved constituents must follow RWQCB's resolution No. 68-16.
 - soils containing 1,000+ ppm of hydrocarbons must be remediated. Soils containing between 100 and 1,000 ppm must be remediated unless sufficient evidence is provided which indicates no adverse effects on groundwater will occur. Clean up of soils to 100 ppm is strongly recommended.
 - design of remedial action system should be based on a review of hydrogeologic and water quality data and on an evaluation of mitigation alternatives. The determination of probable capture zone(s) of extraction system(s) should be based on aquifer characteristics as determined by aquifer test data

VII Reporting

- A. Technical reports should be submitted with a cover letter from the property owners. The letter must be signed by an owner or by an authorized representative of that person.
- B. Monthly reports must be submitted for the next three months with the first report due 90 days from the above letter date.
- C. Quarterly reports must be submitted with the first report due 90 days after the final monthly report. These reports should describe the status of the investigation and cleanup.
- D. All reports and proposals must be signed by a California-Certified Engineering Geologist, California Registered Geologist or a California-Registered Civil Engineer (see page 2, 2 June 1988 RWQCB document). A statement of qualifications should be included in

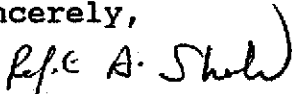
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all reports. Initial tank removal and soil sampling does not require such expertise; however, borehole and monitoring well installation and logging, and impact assessments do require such a professional.

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and RWQCB. You should be aware that this Division is working in conjunction with the RWQCB and that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a late response may result in referral of this case to the RWQCB for enforcement and may subject the property owners to civil liabilities imposed by the RWQCB to a maximum amount of \$1,000 per day.

Should you have any questions concerning the contents of this letter or the status of this case please contact Ariu Levi, Hazardous Materials Specialist, at 415-271-4320.

Sincerely,



Rafat Shahid, Chief
Hazardous Materials Program

cc: Gil Jensen, Alameda County District Attorney, Consumer &
Environmental Protection

Scott Hugenburger, RWQCB
Howard Hatayama, DOHS
Inspector Hallert, OFD
Dino Gonis, West Coast Tank Testing
Files

NOTES TO FILE: TAXI TAXI

8/25/88: TANKS REMOVED.

FOUR TANKS TOTAL. THREE FUEL & ONE WASTE OIL.

10/4/88: SAMPLE RESULTS SUBMITTED. TPH ABOVE 1,000 PPM TPH.
REMEDIATION REQUIRED. RESULTS:

FUEL TANK PIT: SE & SW CORNERS 1300 -
1500 PPM FOR TPH

WASTE OIL PIT: 570 - 783 PPM FOR TOG

12/7/88: SAMPLE RESULTS SUBMITTED. SAMPLES TAKEN FROM SOIL BORINGS
AND STOCKPILES. BORINGS WERE FROM ASSUMED UPGRADIENT AND DOWN
GRADIENT POSITIONS. RESULTS:

STOCK PILES FOR GASOLINE EXCAVATION
SP-1 & SP-2 1.3 PPM TO 13 PPM TPH

STOCK PILE FOR WASTE OIL EXCAVATION
SP-3 13,000 PPM FOR TOG

SOIL BORINGS B1-15 & B2-15 AT SUPPOSED
DOWN GRADIENT DIRECTION FROM GAS EXCAVATION. SAMPLING WAS AT 15 FT
DEPTH AT SUPPOSED GROUND WATER DEPTH.

B1-15 & B2-15 3.4 TO 83 PPM FOR TPH

SOIL BORING B3-15 AT SUPPOSED DOWN
GRADIENT POSITION FROM WASTE OIL EXCAVATION.
B3-15 88 FOR TOG.

GROUND WATER SAMPLES SHOWED BENZENE TO
67,000 PPB, TOLUENE TO 110,000 PPB, & XYLENE TO 17,000 PPB

7/21/89: COPY OF MANIFESTS FOR TANKS PROVIDED.

PROBLEMS:

1. INITIAL SAMPLING SHOWED SITE WAS CONTAMINATED, AND THAT SOILS IN EXCESS OF 1,000 PPM FOR TPH WERE STILL IN THE GROUND.
2. SECOND SET OF SAMPLING SHOWED HEAVY GROUND WATER CONTAMINATION.
3. BORING LOGS BY CEC SHOWED CONTAMINATION ENCOUNTERED AT 5 & 10 FT DEPTHS YET NO SAMPLES WERE TAKEN.
4. GROUND WATER GRADIENT HAD NOT BEEN ESTABLISHED.
5. NO VERIFICATION THAT BAAQMD HAD BEEN CONTACTED FOR AERATION APPROVAL.
6. NO VERIFICATION THAT ADDITIONAL EVAVATING HAD OCCURRED TO REMOVE SOILS WITH 1,000+ PPM SOILS.
7. NO VERIFICATION THAT LATERAL OR VERTICAL IDENTIFIATION OF CONTAMINATION FOR EITHER THE GAS OR WASTE OIL PIT HAD OCCURRED.
NOTE: SAMPLING MAP BY CEC SHOWED NO MEASUREMENTS SHOWING WHERE IN RELATION TO PIT BORINGS HAD BEEN PLACED.
8. NO INDICATION OF DISPOSITION OF O&G CONTAMINATED SOILS (TO 13,000 PPM TOG) THAT HAD BEEN STOCKPILED.
9. NO WORK PLAN HAD BEEN FILED.
10. NO REMEDIATION PLAN HAD BEEN FILED.
11. NO UNAUTHORIZED RELEASE FORM HAD BEEN RETURNED OR FILED.