

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



05-01-01

120354

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

April 30, 2001
StID #554

Mr. Richard Saut
Penske Truck Leasing Company
Route 10 Green Hills Road
P.O. Box 76335
Reading, PA 19603-7635

Re: Fenton's Reagent Treatment Report for 725 Julie Ann Way, Oakland, CA 94621

Dear Mr. Saut:

Our office has received and reviewed the April 23, 2001 Fenton's Reagent Treatment Report for the referenced site prepared by SECOR International Inc., your consultant. This report gives analytical results from wells after the September 2000 treatment of this site with Fenton's reagent, in an attempt to chemically oxidize the residual dissolved and free petroleum product at the site. As noted in the report, the initial work plan was modified slightly based upon actual field results and observations. Fewer injection points were advanced than originally proposed, a larger volume of acid and hydrogen peroxide was added, a higher density of injection points in the vicinity of wells MW-1 and MW-7 were advanced and a longer post-treatment monitoring period was assessed to evaluate the affect of the treatment.

The following observations can be made at this site:

- No apparent dissolution of heavy metals was observed in MW-8, the down-gradient well from the treatment area.
- No pH changes were observed in the monitoring wells within the treatment area indicating the significant buffering capacity of the subsurface soil.
- Estimation of the amount of residual hydrocarbon present in soil and groundwater is difficult. Therefore, the amount of chemical necessary for the treatment cannot be accurately estimated necessitating additional treatment. The presence of free product requires a larger dose of chemical and repeated treatment.
- The affect of the treatment is not immediately observed in groundwater but rather becomes apparent over a longer period of time. Though initial monitoring after chemical treatment did not reflect improvement, subsequent monitoring indicated a significant reduction in dissolved product concentration and the reduction of free product thickness to globules of product.

Because of the residual free product observed in MW-1 and MW-7, SECOR recommends continued treatment of these wells through monthly injections of 8% hydrogen peroxide. Our office concurs with this treatment and also recommends this for all other wells where a sheen or free product is present. Please insure enough time is given to each treated well to equilibrate prior to monitoring.

Mr. Richard Saut
725 Julie Ann Way, Oakland CA 94621
April 30, 2001
StID #554
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. A. McGrath, Secor International Inc., 360 22nd St., Suite 600, Oakland CA 94612
Mr. C. Headlee, SFRWQCB

4Fenton725JAWay

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 8+17-2000

Ro# 354

August 16, 2000
StID # 554

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

Mr. Richard Saut
Penske Truck Leasing Company
Route 10 Green Hills Road
P.O. Box 76335
Reading, PA 19603-7635

**Re: Fenton's Reagent Treatment at Former Penske Truck Leasing, 725 Julie Ann Way,
Oakland CA 94621**

Dear Mr. Saut:

Our office has been in discussion with your consultant, Mr. Angus McGrath of SECOR International, (SECOR) and Mr. Chuck Headlee of the San Francisco Regional Water Quality Control Board (SFRWQCB) regarding the proposal to treat residual diesel contamination at the above referenced site with Fenton's reagent (hydrogen peroxide, iron, acidic solution). We have discussed the efficacy, safety and side reactions of this treatment.

I have also received the results of a recent pilot study, which measured the potential release of soluble heavy metals to groundwater during this treatment. These results do indicate a tendency to release metals from soil not only from the addition of hydrogen peroxide but also through the addition of acids to lower the pH. However, since this test was done in the laboratory, it cannot account for the neutralizing and reduction capability of the native soils at the site. In order to determine if there will be any metal dissolution during actual field conditions, monitoring well MW-8, an immediate down-gradient well from the application area, will be tested for soluble CAM metals. It should also be tested for pH. A contingency plan must be in place should these parameters indicate a potential problem.

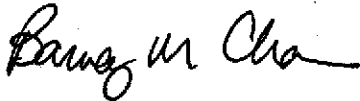
I have also received a mathematical estimation for the amount of hydrogen peroxide required to treat the total petroleum hydrocarbon (TPH) mass estimated to be present in soil and groundwater within the most affected area. Conservative factors have been added to account for the oxidant demand of the soil. It is, therefore, assumed that the proposed volume of hydrogen peroxide will be in excess of the amount actually needed. In any event, should there be significant residual or rebound concentrations of TPH in groundwater after the initial treatment, you should consider an additional treatment. You should also insure that the buffering capacity of the soil is not a factor by monitoring and maintaining the pH within the optimal range.

Given the health hazards and dangers of this chemical, please provide our office a copy of your contractor's health and safety plan. This should include precautions taken to keep the public outside the treatment area.

Mr. Richard Saut
Former Penske Truck Leasing, 725 Julie Ann Way, Oakland CA
StID # 554
August 16, 2000
Page 2.

Your work plan is approved with the condition that you address the above mentioned items.
Please notify our office prior to implementing this work. 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. A. McGrath, SECOR International Inc., 360 22nd St., Suite 600, Oakland CA 94612
Mr. C. Headlee, RWQCB

3Fenton725JAWay

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 4-20-2000
incl cc's

20354

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

April 19, 2000
StID #554

Mr. Richard Saut
Penske Truck Leasing Company
Route 10 Green Hills Road
P.O. Box 7635
Reading, PA 19603-7635

**Re: Fenton's Reagent Work Plan for Penske Truck Leasing, 725 Julie Ann Way,
Oakland CA 94621**

Dear Mr. Saut:

Our office has received and reviewed SECOR's April 17, 2000 work plan outline for the bench study of the addition of Fenton's reagent to soil from the above site. This study is meant to determine if oxidation of chromium in soils to hexavalent chromium would occur during treatment of petroleum affected soils at this site. The laboratory test will be performed on two 10' deep soil samples taken from within the highest impacted soil area, within the saturated zone. Soil samples will be tested with and without the addition of ferrous sulfate solution. A 100 gram soil sample will be added to 100 ml of a 5% hydrogen peroxide solution with the pH adjusted to 2 with sulfuric and acetic acid. The water sample will be tested for CAM metals after 5 days. SECOR intends to monitor hydrogen peroxide, ferrous iron and hexavalent chromium concentrations over time. Please run pH over time as well.

This work plan is accepted and you may proceed with this bench study as soon as possible. Assuming you get no problematic results, please provide answers to those items in my December 21, 1999 letter in your report of findings from the bench study.

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. A. McGrath, SECOR International Inc., 360 22nd St., Suite 600, Oakland CA 94612
Mr. C. Headlee, RWQCB

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

20354

December 21, 1999
StID # 554

Mr. Richard Saut
Penske Truck Leasing Company
Route 10 Green Hills Road
P.O. Box 7635
Reading, PA 19603-7635

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

Re: Work Plan for Penske Truck Leasing Facility, 725 Julie Ann Way, Oakland CA 94621

Dear Mr. Saut:

Our office has received and reviewed the November 29, 1999 Fenton's Reagent Treatment Work Plan for the above site as prepared by SECOR. I have discussed this remediation approach with the Water Board and have also spoke with Mr. Angus McGrath of SECOR. The following items were of concern:

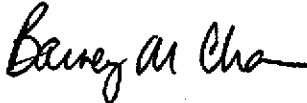
- The concentration of TPH as diesel in groundwater used to estimate the amount of residual contamination should be modified to represent the median concentration of the past four quarters within the wells in the source area.
- Mr. McGrath was going to discuss the merits of specific assumptions made in this estimation including the absorbed hydrocarbon concentration and the ratio of hydrogen peroxide to hydrocarbon.
- Once the amount of peroxide solution needed is determined, our office requests that a map be submitted indicating the locations of the proposed borings.
- Though the work plan called for the injection borings to be approximately 8' in depth, the actual injections would be more in the order of 5' into the aquifer as opposed to the initial two feet.
- Upon discussion with Mr. Chuck Headlee of the Water Board, it is requested that a pilot study be performed to verify the peroxide addition is not causing a deleterious affect in groundwater quality. This could include the oxidation and dissolution of metals and the lowering of groundwater pH. This may be done in-situ or ex-situ. Please have your consultant provide a work plan for this pilot test.
- Your next groundwater monitoring event results would be used in the estimation or the residual petroleum concentration calculation.

Please provide your written response to these items within 45 days or no later than February 8, 2000.

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

Mr. R. Saut
Former Penske Trucking 725 Julie Ann Way, Oakland CA 94621
StID # 554
December 21, 1999
Page 2.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. A. McGrath, SECOR International Inc., 360 22nd St., Suite 600, Oakland CA 94612
Mr. C. Headlee, RWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



20354

October 4, 1999
StID # 554

Mr. Richard Saut
Penske Truck Leasing Co.
Route 10 Green Hills
P.O. Box 7635
Reading, PA 19603-7635

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

Re: Former Penske Truck Leasing Facility, 725 Julie Ann Way, Oakland 94621

Dear Mr. Saut:

Our office has received your September 29, 1999 letter informing our office of the change in consultants for the above site. In addition, we look forward to the proposed work plan for the use of a Fenton's agent injection program and welcome the opportunity to meet and discuss this site with you.

For your next monitoring event, please analyze the water sample with the highest reported TPH as diesel concentration for polynuclear aromatic hydrocarbons (PAHs). This is necessary for risk evaluation. In addition, please filter and pass through a silica gel cleanup, all samples being run for TEPH (ie diesel).

In regards to the work plan for the injection of Fenton's reagent, please see that the following items are addressed:

- Will a pilot study be performed?
- Will multiple applications be applied?
- At what pH will the solution be? What concentration of peroxide will be used?
- Will there be an estimate to the amount of petroleum hydrocarbons present?
- Will there be initial and confirmation soil samplings?

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. P. Hehn, Arcadis Geraghty & Miller, 1050 Marina Way South, Richmond, CA 94804
Wp725JulieAnnWay

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#354

February 22, 1999
StID # 554

Mr. Richard Saut
Environmental Project Manager
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 196603-7635

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

Re: Former Penske Trucking, 725 Julie Ann Way, Oakland CA 94621

Dear Mr. Saut:

Upon review of your Third Quarter 1998 Groundwater Monitoring and Sampling report from Arcadis Geraghty & Miller (AG&M), our office has the following observations:

- Evidence of natural bio-remediation at this site continues to be lacking. Continued presence of free product is found in wells immediately down-gradient of the former underground tank pit.
- The absence of quarterly monitoring of the bio-degradation parameters does not allow an evaluation of the natural attenuation process.
- The additional removal of groundwater from the impacted monitoring wells has had little effect.

Because of these observations, we request the following:

- Please estimate the amount of oxygen and oxygen-releasing compound necessary to treat the estimated amount of residual hydrocarbon in groundwater. After doing this, please propose a method to introduce the required additional oxygen to this site.
- To monitor the presence and consumption of oxygen in groundwater, please run dissolved oxygen in addition to oxidation-reduction potential (ORP) in all wells on a quarterly schedule. Your consultant continues to propose bi-annual monitoring for these parameters, however, the cost of these analyses is small and the information value significant.

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. P. Hehn, Arcadis Geraghty & Miller, 1050 Marina Way South, Richmond, CA 94804
4-725JulieAWay

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20354

December 28, 1998
StID # 554

Mr. Richard Saut
Environmental Project Manager
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 19603-7635

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

Re: Former Penske Trucking, 725 Julie Ann Way, Oakland CA 94621

Dear Mr. Saut:

Our office has received and reviewed the May 1998 Quarterly Groundwater Monitoring Report from Arcadis Geraghty and Miller (AG&M) which was included in their November 20, 1998 report and received by our office on December 15, 1998. The report also included the results of the analysis for the indicator parameters for natural attenuation. These parameters were requested as secondary evidence to confirm that natural attenuation was occurring.

The results from the analysis of these parameters indicate that sufficient bacteria for bio-degradation is present in groundwater at the site. Therefore, the analysis for bacteria is no longer necessary. However, certain parameters are lacking for aerobic bio-degradation; dissolved oxygen and other electron acceptors (nitrate, sulfate and ferrous iron). AG&M states that they are evaluating options for biodegradation enhancement and will provide a proposal for this in the future. Our office looks forward for this proposal. Please keep our office apprised of this proposal in your monitoring reports. At a minimum, your proposal should include the addition of oxygen via some method.

In the meantime, our office requests the continual quarterly monitoring of the bio-degradation parameters, including dissolved oxygen and oxidation-reduction potential along with the other electron acceptors mentioned above.

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. P. Hehn, Arcadis Geraghty & Miller, 1050 Marina Way South, Richmond CA 94804

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

RO 354

June 25, 1998
StID # 554

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

Mr. Richard Saut
Environmental Project Manager
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 19603-7635

RE: Former Penske Trucking, 725 Julie Ann Way, Oakland CA 94621

Dear Mr. Saut:

This letter serves to comment on the past, current and future activities regarding the above site. A number of letters have been written commenting on timeliness of reports and proposed and actual corrective actions taken at the site. Our office's intent is to expedite site closure. Currently, the extent of remedial action has consisted of the addition of oxygen releasing compounds, ORC, into the two observation wells installed within the former tank pit. In addition, so called "power purging" has been done to remove additional groundwater beyond what is commonly removed during the monitoring events. To date, these actions have, at best, had limited success. To attest to this, some wells at the site have been monitored since October 1990, while other more "recent" wells have been monitored since September 1994. This seems to be the result of considerable residual diesel and gasoline having been left in-place in the saturated soils during the time of the tank removals. This residual petroleum source manifests itself in on-going sheen and free product in monitoring wells MW-1, MW-4 and MW-7, immediately down-gradient of the tank pits.

It appears that the attempt to remove large volumes of groundwater from the existing wells ie "power purging" has not been very effective in reducing the petroleum mass. Perhaps this is because the volume of water has not been enough to render an impact. Mr. Hehn of Arcadis Geraghty & Miller, AG&M, has been requested to clarify the quantity of water removed and I would appreciate getting this information offered in his June 22, 1998 letter to me. May I suggest, if this method is to be continued, please remove as much water as possible from those wells within the heart of the petroleum plume. This should include removal from the observation wells. The benefit from the removal of contaminated water greatly exceeds the "lost" of oxygenated groundwater from the observation wells.

Mr. Richard Saut
725 Julie Ann Way
StID # 554
June 25, 1998
Page 2.

Given the considerable residual petroleum mass at this site, the introduction of ORC in the two observation wells will not be enough to treat this amount of hydrocarbon. Please have your consultant verify the amount of ORC necessary to treat this site and make any recommendations which may be necessary.

You should also investigate the need to add other nutrients or supplements as necessary to optimize bioremediation. AG&M noted that oxygen and nutrients appeared depleted in the observation wells, however, only ORC was added to these wells. This supports the need to run bioremediation parameters on a regular schedule. The observation wells should be analyzed to see the affect of the assumed increase in dissolved oxygen. The ORC socks are not so cumbersome that they cannot be removed prior to sampling or even purging, if necessary.

Recall, I also requested an assay for hydrocarbon degrading microbes and heterotrophic microbes in my past letter. AG&M mentions the additional cost required for these analyses. I would suggest that monitoring of wells MW-5 and MW-8 be altered to semi-annually to offset these additional monitoring requirements.

Please keep in mind, site closure as a "low risk groundwater case" requires, among other things, a stabilized or shrinking plume. Therefore, the remediation proposed must achieve this goal and as quickly as possible.

In regards to reporting requirements, our office would hope that the 60 days mentioned by AG&M for timeliness of report provision is obtainable. Our office acknowledges that delays may arise due to unexpected circumstances, however, I would point out the following:

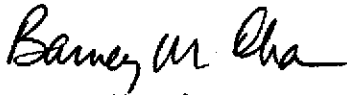
- The report for the installation of the observation wells installed in May 1997 was submitted in AG&M's May 8, 1998 report
- The November 1997 monitoring report was received in March 1998.
- The February 1998 monitoring results was included in the May 8, 1998 Observation Well Installation report. In AG&M's June 22, 1998 letter, they say the first quarter sampling report will be supplied within two weeks. Therefore, the February sampling event will be reported in July.

Please respond to this letter in or along with the upcoming monitoring report.

Mr. Richard Saut
725 Julie Ann Way
StID # 554
June 25, 1998
Page 3.

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. P. Hehn, Arcadis Geraghty & Miller, 1050 Marina Way South,
Richmond, CA 94804

3-725JAWay

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Ro#354

May 20, 1998
StID # 554

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

Mr. Richard Saut
Environmental Project Manager
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 19603-7635

RE: Former Penske Trucking, 725 Julie Ann Way, Oakland CA 94621

Dear Mr. Saut:

Our office has received and reviewed the May 8, 1998 Arcadis Geraghty & Miller report entitled **Observation Well Installation and Biodegradation Enhancement**. I have also read Mr. Paul Hehn's cover letter attached to this report which responds to my April 10, 1998 letter.

I would like to offer the following comments to this report and Mr. Hehn's letter:

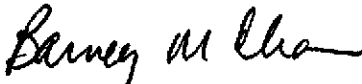
- Although I was notified in May of 1997 of the planned field work for the installation of the two observation wells, because I had not received any report for the installation of these wells, I was not aware that this work had occurred. In addition, the November 1997 monitoring report makes no mention of these observation wells nor are they pictured in any of the figures.
- The results of the analysis of the biodegradation parameters in the two observation wells indicate potential depleted levels of oxygen and nutrients. You should, therefore, consider what can be done to enhance the concentrations of these in groundwater. If dissolved oxygen is low, you should consider installing an array of borings where ORC slurry can be injected into the saturated zone.
- Our office requests that the biodegradation parameters be analyzed in all wells to establish a baseline, background concentration of these parameters. Typically within the heart of the contamination, if biodegradation is occurring, decreases in oxygen, ORP and nutrients are observed. In the absence of oxygen, other electron donors are consumed.
- In regards regular monitoring of these parameters, at a minimum, dissolved oxygen and oxidation-reduction potential (ORP) should be run on all wells during each sampling event. These measurements inexpensive and are done in the field with real time readings.

Mr. Richard Saut
725 Julie Ann Way
StID # 554
May 20, 1998
Page 2.

- Was groundwater removal done from any of the wells during the February 1998 sampling event? This was proposed in the discussion section of the November 1997 monitoring report. You were also asked to clarify the amounts of groundwater removed in past and future purging.
- In this report, page 11 states, "It has not been possible to collect dissolved oxygen measurements during recent sampling event due to higher concentrations of liquid phase petroleum hydrocarbons being present in the wells..." Which wells are they referring to? OW-1 and OW-2 or others? Since there were no dissolved oxygen results reported for any of the wells, one might assume that liquid phase was found in all the wells, however, all the wells were sampled and analyzed, something that it not usually done with wells with liquid phase. These results support my recommendation that something beyond passive bioremediation is necessary at this site.
- Will there be a separate quarterly report for the February 1998 sampling? If not, please provide a groundwater contour map for this event.
- In regards to the timeliness of report submittal, our office would like to receive reports early enough to review, comment and make recommendations for the next quarter's activity, if warranted. To do this, I suggest that a reasonable submittal time is 45 days.

Please provide a written response to this letter within 30 days or by June 22, 1998. 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. P. Hehn, Arcadis Geraghty & Miller, 1050 Marina Way South,
Richmond, CA 94804

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#354

April 10, 1998
StID # 554

Mr. Richard Saut
Environmental Project Manager
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 19603-7635

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

RE: Ongoing Subsurface Investigation at Former Penske Trucking, 725 Julie Ann Way,
Oakland CA 94621

Dear Mr. Saut:

Our office has received and reviewed the November 1997 Quarterly Monitoring Report for the above referenced site as prepared by Arcadis Geraghty and Miller. Upon review of the monitoring data, it is apparent that an active remediation approach is necessary for the site. Continued presence of free product observed in monitoring wells MW-1, MW-4 and MW-7 indicate that a continual source of free product exists near the southern portion of the former tank pit. The additional purging done at the time of groundwater sampling is not having a significant impact in reducing dissolved or free product. To continue only monitoring at this site would likely result in a long and costly proposition. In accordance with the Lawrence Livermore National Laboratory (LLNL) report, long term monitoring is recommended only at low risk sites ie sites where the source has been removed, the contaminant plume is stable or shrinking, where no risk to human health or the environment exists and where the site has been adequately characterized. At these sites, passive bioremediation is recommended along with monitoring to insure the effectiveness of this strategy.

It is apparent that the petroleum source has not been removed and there may be a potential risk to human health in localized areas near the tank pit due to the presence of benzene in groundwater. Because the site does not fulfill all the requirements for low risk, a more aggressive remediation approach must be initiated. One attempt which has been previously discussed by Geraghty and Miller is the addition of oxygen releasing compound (ORC) or nitrates to the tank pit to enhance bioremediation. Our office approved the April 17, 1997 proposal to install two observation wells within the former tank pit for the addition of supplements or the removal of water or free product. Please either confirm that this work has occurred or schedule this work immediately if it has not. Please note, I was to be informed prior to this work occurring. In Geraghty and Miller's April 17, 1997 letter, they state that the decision to add nitrate or ORC to the wells will be based upon the results of a pilot test and that the test results would be available soon.

In my May 6, 1997 letter, in addition to approving the proposal to install the two observation wells, I requested the analysis of the bioremediation parameters; dissolved oxygen, oxidation-reduction potential, nitrate, sulfate and iron +2. I also requested that the wells be assayed for total heterotrophic and hydrocarbon specific degrading microbes. To date, I am not aware that any of these analyses have been done. **Please institute these analyses immediately.** The microbial count may be done on a one-time basis, however, the other parameters should be done routinely along with your quarterly monitoring.

In my December 9, 1997 letter, I again requested that prior to the removal of groundwater, the bioremediation parameters should be analyzed in all wells. I also encouraged the removal of groundwater from the tank pit. The total amount of water purged from the wells has never been stated rather the volume has been unspecified ,

Mr. Richard Saut
StID # 554
Former Penske Trucking, 725 Julie Ann Way
April 10, 1998
Page 2.

eg > 73 gallons. Obviously, the limited amount of groundwater purging which has occurred has had little impact in remediating the groundwater contamination. If this approach is to continue, you should consider removing a much larger volume of groundwater.

Please provide an updated status and work plan to correct the above items mentioned. Your work plan should address:

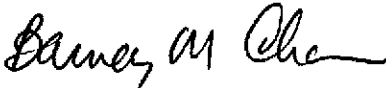
- The incorporation of bioremediation indicator parameter in your QMRs;
- The installation of observation wells within the tank pit;
- The analyses and recommendation for the addition of supplements to the monitoring wells;
- The removal of groundwater and free product from the former tank pit; and
- The evaluation of other potential viable remediation methods.

Please provide your work plan within 30 days or by May 11, 1998.

In addition, please provide your quarterly monitoring reports in a more timely fashion. These reports should be provided within 30 days of the monitoring event. The November 1997 QMR was received by our office on March 18, 1998.

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. P. Hehn, Arcadis Geraghty & Miller, 1050 Marina Way South, Richmond CA 94804

725JAWay

ALAMEDA COUNTY
WASTEWATER SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#354

December 9, 1997
StID # 554

Mr. Richard Saut
Environmental Project Manager
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 19603-7635

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

Re: Former Penske Trucking, 725 Julie Ann Way, Oakland CA 94621

Dear Mr. Saut:

Our office has reviewed the quarterly groundwater reports for the above site up to and including the November 17, 1997 Geraghty & Miller report. Thin layers of free product were reported in wells MW-1, MW-4 and MW-7 and elevated levels of TPHg and TPHd continue to be found in the wells immediately adjacent to the former underground tank pit. Monitoring well MW-8, the "guard well", downgradient of the tank pit has exhibited increasing gasoline and diesel concentrations.

Previously, as a conservative cleanup level for this site, we considered 71 parts per billion benzene (ppb) in groundwater as the maximum concentration allowable to potential discharge to the nearby drainage ditch. We have not, however, been focusing on the Total Petroleum Hydrocarbons concentration. The recent September 1997 result reported 7,000 ppb TPH as diesel. The conservative ecological cleanup level for TPHg and TPHd is 100 ppb based on developmental EC₁₀ data, as is the 71 ppb benzene concentration. It is acknowledged that higher levels of these compounds may be more realistic based upon fate and transport of these contaminants and additional data, however, the recent TPHd levels should be watched.

It appears that the residual soil contamination in the saturated soils beneath the former underground tanks continue to act as a source of TPH. Our office encourages the removal of the source (including free product) and the proposed method of tank pit purging is acceptable. In addition, our office supports enhanced natural bioremediation. To that end, prior to any removal of groundwater, please analyze all monitoring wells for the following parameters: dissolved oxygen, oxidation-reduction potential, nitrate, sulfate and ferrous iron. The need for addition of supplements to the tank pit should be made based upon these results.

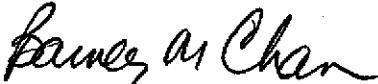
Mr. Richard Saut
725 Julie Ann Way
StID # 554
December 9, 1997
Page 2.

We have the additional observations:

- * There is no need to analyze monitoring wells MW-3 and MW-6.
- * There is no need to run total dissolved solids any longer in groundwater.
- * Please include dissolved oxygen and oxygen-reduction potential on all future monitoring events.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
Mr. P. Hehn, Geraghty & Miller, 1050 Marina Way South,
Richmond, CA 94804

4mon725

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Ro# 354

May 6, 1997
StID # 554

Mr. Richard Saut
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 19603-7635

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

**Re: Former Penske Truck Leasing Facility, 725 Julie Ann Way,
Oakland CA 94621**

Dear Mr. Saut:

Our office has received and reviewed the April 17, 1997 Geraghty and Miller, Inc. (G&M) work plan for the installation of two groundwater observation wells for the above site. As discussed previously with Mr. Paul Hehn of (G&M), our office agrees with this work plan as a method to either remove free product or contaminated water or to add supplements to enhance natural remediation ie ORC (oxygen releasing compounds). After their installation, these wells will be sampled for the analytes; TPHg, TPHd and BTEX. These results will be used to determine how these wells can be best utilized.

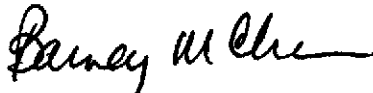
This work plan is approved with the following conditions:

1. Please add the analyte MTBE to the original list. This chemical of concern, which has been used in gasoline since 1980 has not been previously tested for at this site. Its toxicity is currently being determined as carcinogenicity is suspected.
2. Please add the analytes; dissolved oxygen, oxidation-reduction potential, nitrate, sulfate and iron +2. These analytes are indicators of natural biodegradation and there are often relationships with these analytes values and the degree of intrinsic remediation. You should also consider having the wells assayed for total heterotrophic and hydrocarbon specific degrading microbes. The chemical analytes should be monitored along with each sampling event.
3. Please continue to monitor MW-8 until the concentrations of benzene, TPHg or TPHd decrease below the compliance levels in any of the guard wells (71ppb benzene and 100-1000 ppb TPHg or TPHd). Please notify me prior to the well installations.

Mr. Richard Saut
725 Julie Ann Way
StID # 554
May 5, 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. Paul Hehn, Geraghty & Miller, 1050 Marina Way South,
Richmond, CA 94804

3mon725

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 354

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

December 6, 1996
StID # 554

Mr. Richard Saut
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 19603-7635

**Re: Former Penske Truck Leasing Facility, 725 Julie Ann Way,
Oakland CA 94621**

Dear Mr. Saut:

Our office has spoke with your consultant, Mr. Paul Hehn of Geraghty and Miller regarding the above site. We discussed items mentioned in my October 23, 1996 letter. Mr. Hehn has since written a November 22, 1996 letter recounting our most recent conversation. In summary, our office agrees with the revised compliance concentration of 71ppb benzene for this site. We also agree with the recommended remedial approach of installing borings within the former tank pit to continue groundwater removal and introduce chemicals to enhance bioremediation. Your next groundwater sampling event will include monitoring well MW-8 and should continue monitoring if the compliance concentration for benzene is exceeded.

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. Paul Hehn, Geraghty & Miller, 1050 Marina Way South,
Richmond, CA 94804

3mon725

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 354

October 23, 1996
STID # 554

Mr. Richard Saut
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 19603-7635

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

**Re: Former Penske Truck Leasing Facility, 725 Julie Ann Way,
Oakland CA 94621**

Dear Mr. Saut:

Our office has received and reviewed the technical reports for the above site up to and including the October 1, 1996 August 1996 groundwater monitoring report prepared by Geraghty & Miller, Inc. This site is being monitored under the "Containment Zone" policy whereby guard or trigger monitoring wells (MW-1, MW-5 and MW-7) are monitored to verify that the concentration of benzene in these wells is below the previously agreed level of 21 ppb, that level assumed protective of estuarine life. Please be aware that this level may be too conservative. In the one case example where site specific ecological protective cleanup standards were developed for the San Francisco Airport, the Regional Water Quality Control Board came up with a Tier 1 Preliminary Saltwater Maximum Groundwater concentration of 71 ppb (ug/l). In addition, cleanup levels for TEX and petroleum fuels was proposed. The proposed cleanup levels for the petroleum hydrocarbons (gasoline, diesel and jet fuel) was 100 ppb, although the Water Board feels that 1000 ppb may be more realistic based on inherent errors of the evaluation.

Nevertheless, the theory of the "Containment Zone" policy calls for monitoring of guard wells to insure that the cleanup level is not exceeded. Should this cleanup level be exceeded, corrective action should be considered.


If you examine the current TPH and benzene concentrations, wells MW-1 and MW-7 exceed the cleanup levels for TPH gas and diesel and benzene. Although the benzene concentration in MW-7 for the August 28, 1996 monitoring event was ND (<200), the concentration of benzene was likely in exceedance of 71 ppb due to the dilution performed on the water sample. Please specify to your analytical laboratory that you would like to maintain as low of a detection limit for BTEX as possible. I have discussed this issue with Sequoia Analytical and they state that lower detection limits are possible. You should also sample and monitor MW-8, the well closest to the drainage ditch and the groundwater avenue to the San Leandro Bay.

Mr. Richard Saut
725 Julie Ann Way
StID # 554
October 23, 1996
Page 2.

Please have your consultant discuss whether some type of remediation is now appropriate for this site. The removal of additional water from the monitoring wells has not shown any positive effects, although the long term effect is yet to be seen.

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. Paul Hehn, Geraghty & Miller, 1050 Marina Way South,
Richmond, CA 94804

2mon725

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0354

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 19, 1994
StID # 554

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. Marc Althen
Penske Truck Leasing Co.
Route 10, Green Hills
P. O. Box 563
Reading, PA 19603

**Re: Comment on April 25, 1994 Work Plan and Remedial Approach
for former Penske Truck Leasing Co., 725 Julie Ann Way,
Oakland CA 94621**

Dear Mr. Althen:

Our office has received and reviewed the above referenced report from your consultant, Geraghty and Miller. This letter replies to my March 25, 1994 letter commenting on the original work plan from Geraghty and Miller.

This report proposes to replace the guard well, MW-4, with the new well MW-7 and eliminate the well in the extreme northeast corner of the site. This proposal is acceptable and you may proceed with this field activity along with the preparation of your risk assessment as soon as possible.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: P. Hehn, Geraghty and Miller, 1050 Marina Way South,
Richmond, CA 94804
R. Arulanantham, RWQCB
E. Howell, files
2APC725

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0354

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 25, 1994
StID # 554

Mr. Marc Althen
Penske Truck Leasing Co.
Route 10, Green Hills
P.O. Box 563
Reading, PA 19603

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 January 7, 1994 Conceptual Remedial Approach
for Penske Truck Leasing Site, 725 Julie Ann Way, Oakland
CA 94621**

Dear Mr. Althen:

Our office has received and reviewed the above referenced report as prepared and provided by your consultant, Geraghty and Miller. Recall, this report proposes an approach using the following: Alternative Points of Compliance, Risk Assessment, Fate-and-Transport Modeling and Regional Board Resolution 89-39 regarding high dissolved solids.

Our office has met and spoke with Mr. Gary Keyes and Mr. Paul Hehn of Geraghty and Miller and have accepted in theory this approach for site investigation. However, our office has the following comments and requirements:

1. There was some discussion over whether adequate site characterization had been done at this site. Currently, we have only soil and groundwater information from around the original tank pits and from the perimeter of the site. This data comes from the original tank removal samples and from monitoring well data. Our office feels that this data is insufficient. There is obvious attenuation of the soil and groundwater contamination going from the tank pit area to the outlying well, MW-5. Our office will require 2 additional borings between the former tank pit and the perimeter of the site. Please provide a work plan for this work.
2. Please provide your fate-and-transport data using a public domain model. As stated in this conceptual approach, you should show that action levels protective of groundwater and human health will not be exceeded at the perimeter APC wells. You should also provide an appropriate risk assessment to be reviewed by our staff toxicologist.
3. Please expound on what **appropriate additional measures** will be initiated if concentrations in the sentinel wells were to increase over time and exceed the compliance levels. Our office requires specific actions be detailed.

Mr. Marc Althen
StID # 554
725 Julie Ann Way
March 25, 1994
Page 2.

4. Please provide an indemnification letter stating that Penske Truck Leasing Co. will be responsible for clean-up of all sites if shown to be impacted by off-site migration of from this site.

5. As mentioned in conversation with Mr. Hehn, monitoring wells MW-1 and MW-4 may be used as the guard wells and 21 ppb benzene in groundwater has been suggested based on the California Enclosed Bays and Estuaries Plan from the RWQCB. This compliance level is required in the guard wells to be protective of the appropriate receptor. Although, our office makes no comment on the saltwater criteria presented in the proposal, this level of benzene in groundwater, 21 ppb, should be protective of the other parameters of concern: toluene, xylenes and ethylbenzene. Your human health risk assessment may alter this groundwater compliance level and may also determine a soil cleanup level. In addition, in order to complete your risk assessment, you should run the groundwater sample having the highest diesel concentration via GC/MS method 8270.

6. The locations of the proposed three perimeter wells is acceptable and may be scheduled for installation. Please contact me **2 working days** prior to any field activity so I may arrange to be present, if possible.

Please provide a written comment to the above concerns **within 30 days or by April 26, 1994.**

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist



Ravi Arulanantham
Staff Toxicologist

cc: P. Hehn, Geraghty and Miller, 1050 Marina Way South,
Richmond, CA 94804

R. Arulanantham, RWQCB
E. Howell, files APC725

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0354

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

December 10, 1993
StID # 554

Mr. Marc Althen
Penske Truck Leasing Co.
Rt. 10 Green Hills P.O. Box 563
Reading, Pennsylvania 19603

**Re: Request for Work Plan and Remediation Plan for 725 Julie Ann
Way, Oakland CA 94621, Hertz-Pensky**

Dear Mr. Althen:

When we met last on June 8, 1993, at our office, with your consultants from Geraghty and Miller, we discussed the various options which were being considered for the investigation, remediation and monitoring of the above site. At that time, your consultants offered the "Alternative Points of Compliance", (APC), along with a Human Health Risk Assessment as the most likely remedial approach for this site. We left this meeting with an understanding that Geraghty and Miller would provide a draft work plan for comment by our office and that of the RWQCB, if necessary. To this date, over six months later, our office has not received the draft work plan as promised. We have, however, received and reviewed the July 1993 and the October 1993 quarterly monitoring reports for this site. As you are aware, these reports indicate significant gasoline, diesel and benzene contamination in monitoring wells MW-1 and MW-4. Given the existing gradient at this site, MW-5 does not adequately represent downgradient contamination from this site.

As part of your work plan, you should examine the criteria of APC and state how each criteria has or will be satisfied. Specifically, complete site characterization is required. Any compromise to groundwater quality must be approved by the Regional Water Quality Control Board (RWQCB). Additional wells will be required to determine the extent of groundwater contamination and to serve as compliance points. An acceptable plan must be submitted to contain and manage the remaining risks posed by residual soil and groundwater contamination. This plan might include institutional controls such as a deed restriction.

In the event that no active remediation is proposed, you should determine the added human health risk represented by the residual contamination at this site. Our office is aware that Geraghty and Miller has contacted our staff toxicologist, Ravi Arulanantham, about reviewing your risk assessment.

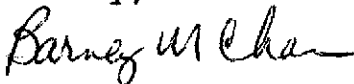
Mr. Marc Althen
725 Julie Ann Way
StID # 554
December 10, 1993
Page 2.

Please be aware that our office will still act as the lead agency for this site. Should you submit, as part of your proposed remedial approach, a risk assessment we will use the services of Ravi, as needed.

Based on the review of all reports and data for this site, the criteria of APC has not been met. Our office also requires the provision of a contingency plan which will be initiated when elevated contamination is detected in the compliance wells for an extended period.

Please provide your work plan, addressing the above requirements, **within 30 days or by January 12, 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 technical reports may subject you to civil liability. 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
P. Hehn, Geraghty and Miller, Inc., 1050 Marina Way South,
Richmond, CA 94804
Mr. D. McCosker, Independent Construction Co., P. O. Box
5307, Concord CA 94524
R. Arulanantham, ACHCSA
E. Howell, files

2wp725

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 17, 1993
StID# 554

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. Marc Althen
Penske Truck Leasing Co.
Rt 10 Green Hills P.O. Box 563
Reading, Pennsylvania 19603

**Re: Comment on March 17, 1993 Work Plan for Monitoring Well
Installation at 725 Julie Ann Way, Oakland CA 94621**

Dear Mr. Althen:

Our office has received and reviewed the following reports from your consultant, Geraghty and Miller, Inc. :

- * Site Assessment Report Additional Soil and Groundwater Assessment March 15, 1993
- * Results of Quarterly Groundwater Monitoring, January 1993 March 8, 1993
- * Work Plan and Project Budget Estimate for Additional Soil and Groundwater Assessment March 17, 1993.

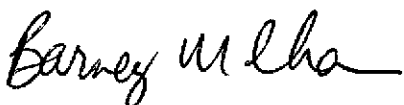
I recently spoke with Mr. Paul Hehn of Geraghty and Miller on May 14, 1993 concerning the status of the investigation and remediation at the above site. First, I would like to give approval for the installation of the three additional wells proposed in the March 17, 1993 workplan. They will serve to determine the extent of groundwater contamination at this site. Next, I would like to summarize the items discussed with Mr. Paul Hehn. This conversation was initiated in order to determine the urgency Penske had for investigating this site. Penske need to decide on its next investigative steps given the fact that considerable soil and groundwater contamination exists. These steps are beyond the installation of the three proposed monitoring wells. It appears that localized soil contamination exists which is causing the groundwater contamination being detected in MW-1, MW-4 and MW-3.

The option discussed was whether site characteristics for on-going monitoring exist via "alternate points of compliance". This option requires the excavation of highly contaminated soils. localized contamination, low mobility soils and investigating the applicability of soil and groundwater extraction. We agreed that groundwater quality should be determined along with the determination of the extent of soil contamination. After Mr. Hehn has discussed these items with you, please submit a work plan for the additional investigation.

Mr. Marc Althen
725 Julie Ann Way
StID # 554
May 17, 1993
Page 2.

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
P. Hehn, Geraghty & Miller, 1050 Marina Way South, Richmond,
CA 94804
E. Howell, files

WP725J

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0354

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

January 4, 1993
STID # 554

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. Marc Althen
Penske Truck Leasing Co.
Rt. 10 Green Hills P.O. Box 563
Reading, Pennsylvania 19603

**Re: Evaluation of Work Plan for Additional Soil and Ground
Water Assessment, former Penske Truck Leasing Facility,
725 Julie Ann Way, Oakland CA 94621**

Dear Mr. Althen:

I have found and reviewed the November 11, 1992 Work Plan for the work described above and have spoken today with Mr. Paul Hehn of Geraghty and Miller, Inc. It appears that the work described in this work plan serves to determine the groundwater and soil contamination only in the downgradient location relative to the initial tank pit. As you are aware, the soil contamination found in the samples from the original tank pull and from the borings from monitoring wells 1-3 indicate areas of undetermined soil contamination. These areas will need to be investigated through an additional work plan addendum as well as the groundwater downgradient to them.

Our office does recognize the merit of the initial boring and well installations and you may proceed with this activity. You are requested to notify me 48 working hours prior to performing this work for potential witnessing of these activities. You are also requested to provide a timetable for the submission of a work plan addendum which fully determines the extent of soil and groundwater contamination. Please provide this addendum within 30 days of receipt of this letter.

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

Sincerely,

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

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiatt, RWQCB
P. Hehn, Geraghty and Miller, Inc., 1050 Marina Way South,
Richmond, CA 94804
D. McCosker, 908 Forest Ln., Alamo, CA 94507
E. Howell, files WPAdd725

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0354

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

December 30, 1992
STID #554

Mr. Marc Althen
Penske Truck Leasing Co.
Rt 10 Green Hills P.O. Box 563
Reading, Pennsylvania 19603

**Re: Request for Further Subsurface Investigation at Hertz-Pensky,
725 Julie Ann Way, Oakland CA 94621**

Dear Mr. Althen:

Our office has been reviewing the quarterly monitoring reports provided by your consultant, Geraghty and Miller, for some time. As you are aware, quarterly monitoring of the three wells at this site has occurred since their installation in 1990. Over this period from 1990 to present, significant Total Petroleum Hydrocarbons as gasoline and diesel, (TPHg and TPHd), along with benzene, toluene, ethylbenzene and xylenes, (BTEX), has been found in MW-1 and to a lesser degree MW-2 and MW-3. It is appropriate now to request further subsurface investigation to determine the extent of the soil and groundwater contamination.

Recall that the results of the seven soil samples taken from the underground tank removals indicated high TPHg and TPHd concentrations around the perimeter of the common excavation pit of the gasoline and diesel tanks as well as within the waste oil excavation pit. Six borings, three which were converted into MW-1 through MW-3, were later installed to define the extent of soil and groundwater contamination. The December 4, 1989 work plan for Initial Soil and Groundwater Assessment, stated that "additional borings or wells would be drilled at locations 50 to 100 feet from a boring in which hydrocarbons were detected in the field". Unfortunately, this was not done when initial analytical results indicated high gas and diesel soil contamination around the tank pit nor when the results from the borings/monitoring wells gave similar results.

Because of this, the extent of soil and groundwater contamination has yet to be determined. The significant TPHg, TPHd and BTEX being found in MW-1, and the westerly gradient indicates that such contamination is likely migrating offsite. Contamination downgradient to MW-3 is also undetected due to the absence of a well in this location. You are requested to provide our office, **within 45 days**, a workplan addendum which outlines a plan for an assessment which determines the full extent of soil and groundwater contamination.

Mr. Marc Althen
STID #554
725 Julie Ann Way
December 30, 1992
Page 2 of 2.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). All workplans, analytical results or reports should be sent to our office and to that of the Regional Water Quality Control Board (RWQCB) to the attention of Mr. Rich Hiatt. Their address is 2101 Webster St., Suite 500, Oakland CA 94612. Be aware that failure to submit the requested documents may subject you to civil liability. In addition, failure to perform the additional subsurface investigation may be considered the improper closure of an underground tank which is a violation of Section 25299 (5) and which also carries significant civil liability.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiatt, RWQCB
J. Hawkins, Geraghty and Miller, Inc., 1050 Marina Way South
Richmond, CA 94804
D. McCosker, 908 Forest Lane, Alamo, CA 94507
E. Howell, files

725Req

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0354

September 19, 1990

Kevin Brewer
Hertz Penske Leasing, Inc.
725 Julie Ann Way
Oakland, CA 94621

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

Re: Waste Minimization Assessment

Dear Kevin Brewer:

Your business has been selected to receive a hazardous waste minimization assessment. As you are probably aware, hazardous waste reduction has become a statewide, if not a national, issue. To address this issue at a county level, Alameda County is establishing its own Hazardous Waste Minimization Program and is planning to conduct waste minimization assessments for all hazardous waste generating facilities in the County.

We have chosen businesses in the auto repair industry to receive the first round of waste minimization assessments. It is our hope that these assessments will assist participating businesses in minimizing their hazardous wastes - and will give us further information on the best way to structure our minimization program.

One of our Hazardous Materials Specialists will be contacting you during the week of September 24 to arrange a meeting with you for an assessment of your business. During this meeting and assessment, the Specialist will work with you in examining your business's hazardous waste generating practices. The Specialist will then provide you with materials on waste reduction technology and assist you in setting up appropriate hazardous waste minimization practices.

We look forward to working with you in reducing the amount of hazardous waste your business generates. Of course, your comments and suggestions are encouraged; we need your input in order to best serve you! Please direct any comments and questions to Katherine Chesick at 415/271-4320.

Sincerely,

A handwritten signature in cursive script that reads "Edgar B. Howell".

Edgar B. Howell, Chief,
Alameda County Hazardous Materials Division

EBH:kac

cc: Fire Department
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0354

September 4, 1990

Mr. Marc Althen
Penske Leasing
Route 10 Green Hills
Reading, PA 19603

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

Re: Underground Fuel Tank Removals
725 Julie Ann Way, Oakland, CA

Dear Mr. Althen:

From conversations with Penske Leasing, it appears the required investigative and remedial work at the site shown above has been on hold pending written approval from this office of the Work Plan submitted by the consulting firm of Geraghty and Miller, Inc.. The plan was reviewed and found to be a generic first phase approach to further evaluation of the extent of contamination, and in conformance with the guidance provided by this office in the October 24, 1989 letter to your office. The lack of written acceptance by this office of the Work Plan was not meant to put this project on hold, nor does it justify the absence of diligent actions to protect waters of the State.

The Work Plan is acceptable to this office with the following points of clarification or change.

1. The Work Plan fails to address the issue of stockpiled soils. All soils removed during the removal of tanks or during any subsequent over excavation must be accounted for. Excavated soils with TPH or TOG levels in excess of 10 ppm (or 50 ppm for TOG by method 503 D&E) must be disposed of at an appropriate landfill. On-site re-use of contaminated soils must be with the San Francisco Regional Water Quality Control Board's (SFRWQCB) approval. On-site re-use of remediated soils is allowed provided the documentation requirements of the SFRWQCB are met.

The Plan must identify the course(s) of action taken to properly handle, dispose of, or remediate all contaminated excavated soil. Documentation must be in the form of manifests, weight tags from Class III facilities, sample analyses, chain of custody forms, sample maps, permits for aeration or Waste Discharge Requirements.

2. The lateral and vertical extent of subsurface soil contamination must be identified to the 100 ppm for TPH g or d or TOG isoconcentration line. Boring to the depths identified is acceptable as a means of evaluating soil contamination with the sampling frequency set at one sample for every five feet of bore. A sampling frequency that varies from this standard must be justified in an amendment to the Work Plan.

Penske
September 4, 1990
Page 2

3. Contaminant assessment of the soil sample from the waste oil pit was incomplete. The accepted Closure Plan requested the soil sample be evaluated for chlorinated hydrocarbons by EPA Method 8010 (prep by method 5030).

The evaluation of the extent of subsurface soil contamination in the area of the former waste oil tank must include an evaluation for chlorinated hydrocarbons by method 8010 or by method 8240. Of course, the use of method 8240 will preclude the need for a separate evaluation for BETX by method 8020.

4. Slug tests to estimate hydraulic conductivity in the area of the tested wells is acceptable to the County. The Division also recommends aquifer stress tests if the results will be used to design ground water remediation options.

If the above changes or requests for clarification are acceptable to Penske Leasing, work at the site can begin without further notice from the Division. An amended Work Plan that includes the above changes should be submitted to this office and the SFRWQCB.

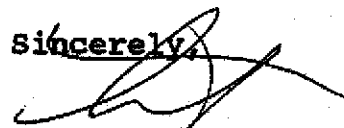
You are reminded of your responsibility to fully address all areas of contamination caused by your organization, and the civil liabilities for failing to act appropriately. You are also reminded of the time table given to your organization in the Division's last letter, and your responsibility to keep this office and the SFRWQCB updated of your progress or lack there of.

Last, you are requested to respond to this office and the SFRWQCB by September 20, 1990 with a report that identifies the status of this case, provides this office with a copy of all manifests for tanks, associated piping, rinsate, and soil, and a time schedule for completing the tasks of the Work Plan and addressing the remaining points of the Division's earlier letter. You are informed that this is a formal request for documentation pursuant to California water Code, section 13267 (b).

Penske
September 4, 1990
Page 3

If you have any questions concerning the contents of this letter please feel free to contact me at 415-271-4320.

Sincerely,



Ariu Levi, Senior Hazardous Materials Specialist
Alameda County Environmental Health

cc: Rafat A. Shahid, Alameda County Environmental Health
Gil Jensen, Alameda County District Attorney's Office,
Consumer and Environmental Protection
Steven LuQuire, SFRWQCB
Howard Hatayama, DHS
McKosker, Property Owner
Jeff Hawkins, Geragthy Miller Inc.
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0354

August 23, 1990

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

Mr. David McCosker
740 Julie Ann Way
Oakland, CA 94606

Re: Underground Tank at 725 Julie Ann Way
Request for a Work Plan

Dear Mr. McCosker:

Enclosed please find a copy of my letter to Mr. Marc Althen of Penske Leasing requesting a work plan for the remediation of any contaminated soil and groundwater at 725 Julie Ann Way. Please contact me at 271-4320 should you have any questions.

Sincerely,

Barney Chan for

Ariu Levi
Senior Hazardous Materials Specialist

enclosure

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0354

Certified Mail P 062 128 157

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

August 21, 1990

Mr. Marc Althen
Penske Leasing
Route 10 Green Hills
Reading, PA 19603

Re: Release of Work Plan for 725 Julie Ann Way, Penske Truck Leasing Co.

Dear Mr. Althen:

Alameda County Environmental Health has been requested by Mr. David Mc Cosker, owner of the referenced property, to provide him with a copy of the work plan for site assessment and remediation provided for you by Geraghty and Miller, Inc. We have discussed this with County Counsel and feel this information is public information. If you have any evidence that this information contains anything that would preclude its disclosure please inform our office in writing within ten (10) days of receipt of letter. If we do not receive any reply within this timeframe this information will be released to Mr. Mc Cosker.

Please contact the undersigned should you have any questions regarding this letter.

Sincerely,

Barney Chan for

Ariu Levi
Senior Hazardous Materials Specialist

cc: Mr. Dave Mc Cosker, 740 Julie Ann Way, Oakland CA 94606
Mr. Jeffrey Hawkins, 1050 Marina Way South, Richmond CA 94804

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0354

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

Certified Mail #P 062 127 687

October 24, 1989

Mr. Marc Althen
Penske Leasing
Route 10 Green Hills
Reading, PA 19603

Subject: Unauthorized Release
Underground Fuel and Waste Oil Tanks
725 Julie Ann Way
Oakland, CA 94606

Dear Mr. Althen:

Thank you for submitting the results for analysis of subsurface soil 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.

Penske Leasing
October 24, 1989
Page 2

I. Introduction

- A. Statement of scope of work
- B. Site map showing location of existing and past underground storage tanks
- 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, and sample map
 - indicate depth to ground water
 - describe soil strata encountered
 - provide soil sampling results, detection limits, chain of custody forms, identity of sampler
 - include results of waste oil pit sample analysis, ie, TOG by 503 D&E, 8240, CAM metals by ICAP or AA, and TPH(G&D) by 5030/8015
 - ground water analysis, ie, TPH(G&D), BTXE
 - describe methods for storing and disposal of all soils
- C. Submit Unauthorized Release Form

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

Penske Leasing
October 24, 1989
Page 3

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

Penske Leasing
October 24, 1989
Page 4

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 Penske Leasing. The letter must be signed by a principal executive officer 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

Penske Leasing
October 24, 1989
Page 5

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 Penske Leasing to civil liabilities imposed by the RWQCB to a maximum amount of \$1,000 per day. Any extensions of agreed upon time deadlines must be confirmed in writing by either this Division of the RWQCB.

Should you have any questions concerning the contents of this letter or the status of this case please feel free to contact me.

Sincerely,



Ariu Levi, Hazardous Materials Specialist
Hazardous Materials Program

cc: Gil Jensen, Alameda County District Attorney, Consumer
Environmental Protection
Rafat Shahid, Assistant Agency Director
Lester Feldman, RWQCB
Howard Hatayama, DOHS
Jeffery Hawkins, Geraghty & Miller
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

DAVID J. KEARSAGENCY
~~XXXXXXXXXXXX~~ Agency Director



R0354

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470-27th Street, Third Floor
Oakland, California 94612
(415) 874-7237

December 18, 1987

Mr. Milton W. Cooper
145 E. 14th Street
Oakland, CA 94606

Dear Mr. Cooper:

We are in receipt of your letter of November 13, 1987, requesting the opportunity of inspecting our files concerning underground tanks at the following locations:

- (R01439) Rock Transport - 5900 Coliseum Way, Oakland
- (R0354) Hertz Penske Truck Rental - 725 Julie Ann Way, Oakland
- (R01590) Independent Construction - 740 Julie Ann Way, Oakland

These sites all have permit applications on file, no inspections have been accomplished at this time.

IF you wish to inspect the public part of these files, please call for an appointment.

If you have any questions, please call Edgar B. Howell, III, Senior Hazardous Materials Specialist, at 874-7237.

Sincerely,

R/A.S.V.
Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:EH:mnc

cc: Files
Edgar B. Howell