

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SEST  
8-22-05

August 19, 2005

Marianne Robison, President  
Buttner Properties  
600 W. Grand Ave.  
Oakland, CA 94612

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

Dear Ms. Robison:

Subject: Fuel Leak Case No. RO000359, Dave's Station, 2250 Telegraph Ave.,  
Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed "February 2004 Work Plan Addendum, Additional Site Study..." dated August 5, 2004 prepared by Fugro West, Inc. (Fugro). This Addendum is in response to a letter dated June 9, 2004 and revises the Work Plan. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) Site Characterization - Soil vapor sampling has been proposed rather than groundwater sampling. We feel that the plume ought to be defined prior to soil vapor sampling. Nevertheless, most of the sampling locations proposed appear to be suitable for groundwater sampling for site characterization. Temporary Well Point 4 collected on West Grand Ave. south of the property found 11,000 microgram (ug/l) Total Volatile Hydrocarbons (TVH), 1,900 ug/l TPH-D, and 130 ug/l Benzene. Additional groundwater samples south of Temporary Well Point 4 should be considered. Include your proposal for collecting additional groundwater samples to define the lateral and vertical extent of the dissolved contaminant plumes in the Work Plan Addendum Revision requested below.
- 2) Source Characterization - Your proposal for geoprobes does not indicate depths. Vertical delineation requires sampling at sufficient depths. Soil sample WO-6@11' found 250 milligram/kilogram (mg/kg) TPH-D, 640 mg/kg TPH-Motor Oil (TPH-MO), and 1,700 mg/kg Oil & Grease (O&G). Soil sample WO-8@11.5' found 100 mg/kg TPH-G, 680 mg/kg TPH-D, 1,100 mg/kg TPH-MO, and 2,700 mg/kg O&G. Soil sample WO-10@11.5' found 210 mg/kg TPH-D, 360 mg/kg TPH-MO mg/kg, and 470 mg/kg O&G. Please propose depths for the geoprobes in the source area by the waste oil tank excavation in the Work Plan Addendum Revision requested below.

Ms. Robison  
August 19, 2005, Page 2 of 3

- 3) Boring Soil Sampling in the source areas – Only one soil sample from the vadose zone from each geoprobe hole is proposed. Soil samples shall be collected at a minimum of every 5 ft., including at changes of lithology, at the soil/groundwater interface, and at areas of obvious contamination. Please modify your proposal for source area boring soil sampling in the Work Plan Addendum Revision requested below.

#### TECHNICAL REPORT REQUEST

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

August 19, 2005 - Work Plan Addendum Revision  
60 days after Work Plan Addendum Revision approval - Soil and Water Investigation Report  
October 31, 2005 - 3<sup>rd</sup> Quarter 2005 Groundwater Monitoring Report  
January 31, 2006 - 4<sup>th</sup> Quarter 2005 Groundwater Monitoring Report  
April 30, 2006 - 1<sup>st</sup> Quarter 2006 Groundwater Monitoring Report  
July 31, 2006 - 2<sup>nd</sup> Quarter 2006 Groundwater Monitoring Report

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to 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 Instructions." 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. 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 USTs have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

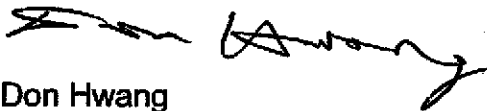
Ms. Robison  
August 19, 2005, Page 3 of 3

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.

If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang

Hazardous Materials Specialist  
Local Oversight Program

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

c: Jeriann Alexander, Fugro West, Inc., 1000 Broadway, Suite 200, Oakland, CA 94607  
Donna Drogos  
File



SENT  
6-10-04

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

June 9, 2004

Marianne Robison  
Buttner Properties  
600 W. Grand Ave.  
Oakland, CA 94612

Dear Ms. Robison:

Subject: Fuel Leak Case No. RO000359, Former Dave's Station, 2250 Telegraph Ave.,  
Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed "Summary of Site Studies Preferential Pathway Survey, Well Survey and Preliminary Risk Evaluation Work Plan for ~~Additional Site Study~~" dated February 2004. The Work Plan focuses on soil vapor sampling. We request that you address the following technical comments and send us the technical reports requested below.

#### TECHNICAL COMMENTS

- 1) Site Characterization - Soil vapor sampling has been proposed rather than groundwater sampling. We feel that the plume ought to be defined prior to soil vapor sampling. Nevertheless, most of the sampling locations proposed appear to be suitable for groundwater sampling for site characterization. However, the proposed location near G12 may be unnecessary since another location further downgradient is also proposed. Also, the proposed location north of the waste oil tank excavation may be moved southeast 20 feet. Include your proposal for collecting groundwater samples to define the lateral and vertical extent of the dissolved contaminant plumes in the Work Plan Addendum requested below.
- 2) Source Characterization - Soil vapor sampling with limited soil sampling has been proposed. We feel that soil sampling ought to be used for defining the source area prior to soil vapor sampling. Nevertheless, the locations proposed adjacent to the waste oil tank excavation can be used for this purpose. However, more sampling locations are required by the waste oil tank excavation as well as in the area of the dispenser islands. Include your proposal for soil sampling to define the lateral and vertical extent of soil contamination in the Work Plan Addendum requested below.
- 3) Preliminary Risk Evaluation - The site selection criteria chosen included "Non-drinking water beneficial use" for the San Francisco RWQCB Environmental Screening Levels-(ESL's) and "Sandy Silt Defaults" for City of Oakland Urban Land Redevelopment Program (URL). Instead, "Drinking water beneficial use" and "Merritt Sand Defaults", ought to have been used. Using these site selection criteria for benzene, the soil and groundwater ESL's did not change, 180

Ms. Robison  
June 9, 2004  
Page 2 of 2

ug/kg and 530 ug/l, respectively. The soil URL decreased to 700 ug/kg while the groundwater URL for carcinogenic risk is 1,400 ug/l. Thus, the highest benzene concentration in soil, 820 ug/kg, now also exceeds the URL as well as the ESL while the highest benzene concentration in groundwater, 410 ug/l, still is less than the ESL and URL.

4) Soil and Groundwater Analyses – Include the lead scavengers, Ethylene Dibromide (EDB), Ethylene Dichloride (EDC) for soil and groundwater analyses. Groundwater Analyses – We request that you include the other fuel oxygenates Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), and Tertiary Butyl Alcohol (TBA), and Ethanol by EPA Method 8260 for analyses of grab and monitoring well groundwater samples. If any of the latter compounds are detected, and are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan. Please include these revisions in the Work Plan Addendum requested below.

5) Historical Hydraulic Gradients – Please show using a rose diagram with magnitude and direction; include cumulative groundwater gradients in all future reports submitted for this site.

6) Groundwater Monitoring Frequency – The wells were last sampled April 2001 at a frequency greater than quarterly. Please initiate quarterly monitoring for a year.

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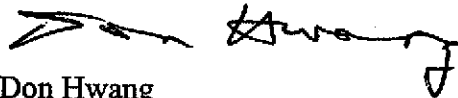
#### TECHNICAL REPORT REQUEST

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

August 9, 2004 - Work Plan Addendum  
60 days after Work Plan approval - Soil and Water Investigation Report  
October 31, 2004 - 3<sup>rd</sup> Quarter 2004 Groundwater Monitoring Report  
January 31, 2005 - 4<sup>th</sup> Quarter 2004 Groundwater Monitoring Report  
April 30, 2005 - 1st Quarter 2005 Groundwater Monitoring Report  
July 31, 2005 - 2<sup>nd</sup> Quarter 2004 Groundwater Monitoring Report

If you have any questions, call me at (510) 567-6746.

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Emily Silverman, Subsurface Consultants, Inc., 1000 Broadway, Suite 200, Oakland, CA  
94607  
Donna Drogos  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



04-07-03  
ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

April 4, 2003

Marianne Robison  
Buttner Properties  
600 W. Grand Ave.  
Oakland, CA 94612

Dear Ms. Robison:

Subject: Fuel Leak Case No. RO000359, Former Dave's Station, 2250 Telegraph Ave.,  
Oakland, CA

Our letter of January 16, 2002 requested a risk-based evaluation of the residual contaminant concentrations found in soil and groundwater and a well survey. Please postpone the risk-based evaluation. We request that you address the following technical comments and send us the technical reports requested below.

#### TECHNICAL COMMENTS

- 1) Site Characterization - The lateral and vertical extent of the dissolved contaminant plumes is undefined. Grab groundwater sample 1 collected on the eastside property boundary, which is adjacent to a playground, detected 13,000 microgram (ug/l) Total Volatile Hydrocarbons (TVH), and 37,000 ug/l TPH-D. Grab groundwater sample 4 collected on West Grand Ave. south of the property found 11,000 ug/l TVH, 1,900 ug/l TPH-D, and 130 ug/l Benzene. Include your proposal for defining the lateral and vertical extent of the dissolved contaminant plumes in the Work Plan requested below.
- 2) Source Characterization - The lateral and vertical extent of soil in the source area is undefined. Soil sample WO-6@11' found 250 milligram/kilogram (mg/kg) TPH-D, 640 mg/kg TPH-Motor Oil (TPH-MO), and 1,700 mg/kg Oil & Grease (O&G). Soil sample WO-8@11.5' found 100 mg/kg TPH-G, 680 mg/kg TPH-D, 1,100 mg/kg TPH-MO, and 2,700 mg/kg O&G. Soil sample WO-10@11.5' found 210 mg/kg TPH-D, 360 mg/kg TPH-MO mg/kg, and 470 mg/kg O&G. Include your proposal for defining the lateral and vertical extent of soil contamination in the Work Plan requested below.
- 3) Preferential Pathway Survey - We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site. Of particular concern is the identification of abandoned wells and improperly-destroyed wells that can act as vertical conduits to deeper water bearing zones, pumping wells in the vicinity of your site, and manmade conduits for shallow migration.

Ms. Robison  
April 4, 2003  
Page 2 of 2

Please submit map(s) and cross-sections showing the location and depth of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s). Evaluate the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers. Report your findings below.

4) Well Survey – List wells within a quarter mile radius of the site. Indicate which of these may be potential receptors. Please submit.

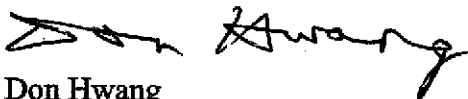
#### TECHNICAL REPORT REQUEST

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

June 4, 2003 - Site Characterization and Source Characterization Work Plan,  
Preferential Pathway Survey, Well Survey

If you have any questions, call me at (510) 567-6746.

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Emily Silverman, Subsurface Consultants, Inc., 1000 Broadway, Suite 200, Oakland, CA  
94607  
Donna Drogos  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



01-18-02

R0359

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

January 16, 2002

Marianne Robison  
Buttner Properties  
600 W. Grand Ave.  
Oakland, CA 94612

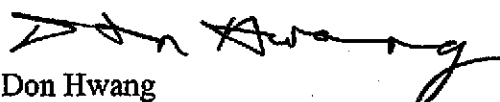
Dear Ms. Robison:

Subject: Former Dave's Station, 2250 Telegraph Ave., Oakland, CA;  
RO000359

"April 2001, Groundwater Monitoring Event..." dated August 23, 2001 by Subsurface Consultants, Inc., was reviewed. The six site wells were sampled on April 27, 2001 for Total Volatile Hydrocarbons as Gasoline (TVHg), Total Extractable Hydrocarbons as Diesel (TEHd), benzene, toluene, ethylbenzene, xylene (BTEX), and Methyl Tertiary-Butyl Ether (MTBE). Analyte concentrations were consistent with the more recent sampling events. MW-2 and MW-5 were nondetectable for all analytes. BTEX and MTBE concentrations were nondetectable or low for all wells. TVHg was detected in MW-1, MW-4, and MW-6, at 160, 1,900, 1,600 micrograms per liter (ug/l), respectively. TEHd was detected in MW-3, MW-4, and MW-6, at 690, 710, and 440 ug/l, respectively.

A risk based evaluation of the residual contaminant concentrations found in soil and groundwater and a well survey are required. Submit. If you have any questions, call me at (510) 567-6746.

Sincerely,

  
Don Hwang  
Hazardous Materials Specialist

C: Emily Silverman, Subsurface Consultants, Inc., 1000 Broadway, Suite 200, Oakland, CA  
94607

File



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Sent 11-9-99  
Including cc's

20359

November 8, 1999

STID 1040

Ms. Marianne Robison  
Buttner Properties  
600 West Grand Avenue  
Oakland, CA 94612

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

RE: (Former) Dave's Station, 2250 Telegraph Avenue, Oakland

Dear Ms. Robison:

This letter follows the receipt and review of the April 13, 1999 Subsurface Consultants, Inc. (SCI) monitoring report for the subject site, and is inspired by several telephone conversations I have shared with SCI staff since July 1999. I have been informed that the sampling and monitoring program for this case has effectively stopped.

Consistent with the directive issued by this office on June 16, 1998 (attached), please continue to sample and monitor all wells associated with this investigation following a semi-annual schedule. This work is to occur, as before, in the 1<sup>st</sup> and 3<sup>rd</sup> quarters of each year. Technical reports shall be submitted within 60 days of the completion of each sampling/monitoring event.

Please be advised that this schedule shall remain in affect until notified otherwise. Sampling, monitoring, and reporting shall begin again during the 1<sup>st</sup> quarter of 2000.

Target compounds sought in collected samples need only be:

- Total petroleum hydrocarbons as gasoline (TPH-G) and diesel (TPH-D)
- Benzene, toluene, ethylbenzene, and total xylene isomers (BTEX )
- Methyl tert-butyl ether (MtBE)

You may omit the continued confirmation of MtBE through application of EPA Method 8240 or 8260. You may also omit analyses for non-fuel volatile organic compounds (VOC). In addition, you are not being directed to collect "bio-parameter" samples at this time.

Ms. Marianne Robison  
RE: 2250 Telegraph Avenue, Oakland  
November 8, 1999  
Page 2 of 2

Please call me at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

Attachment

c: Chuck Headlee, RWQCB  
Leroy Griffin, Oakland Fire Department  
Jeriann Alexander, Subsurface Consultants, Inc.  
3736 Mt. Diablo Blvd., Ste. 200, Lafayette, CA 94549-3659

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

P0559

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

May 7, 1999

STID 1040

Ms. Marianne Robison  
Buttner Properties  
600 West Grand Avenue  
Oakland, CA 94612

RE: Dave's Station, 2250 Telegraph Avenue, Oakland

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Ms. Buttner:

This letter is to inform you of new legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, you have been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.

LANDOWNER NOTIFICATION  
Re: 2250 Telegraph Avenue, Oakland  
May 7, 1999  
Page 2 of 2

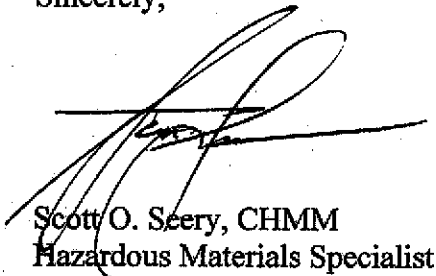
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

You may use the enclosed "notice of proposed action" form (sample letter 3) as a template to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

Please call me at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB  
Leroy Griffin, Oakland Fire Department

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

R0359

June 16, 1998

STID 1040

Ms. Marianne Robison  
Buttner Properties  
600 West Grand Avenue  
Oakland, CA 94612

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

RE: DAVE'S STATION, 2250 TELEGRAPH AVENUE, OAKLAND

Dear Ms. Robison:

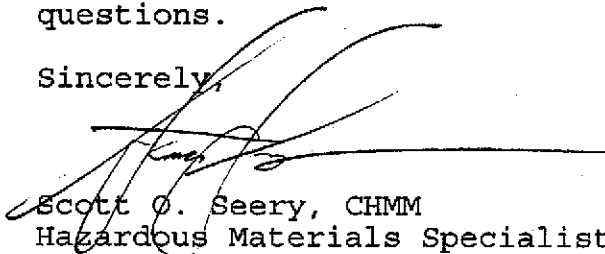
This office is in receipt of the August 8, 1997 Subsurface Consultants, Inc. (SCI) report, submitted under SCI cover dated May 28, 1998. The cited SCI report documents the results of the installation and sampling of off-site wells MW-5 and MW-6. This work was reportedly completed during June 1997.

Four additional wells (MW-1 through MW-4) are located on the subject property. None of these four have been monitored or sampled since September 1995. The off-site wells (MW-5, -6) have not been monitored/sampled since June 1997. Consequently, the status of the continued groundwater investigation associated with the release at this site is unknown.

At this time, please adhere to a semi-annual schedule for monitoring and sampling the 6 wells. Such is to occur in the 1st and 3rd quarters of the year. Hence, the next event will occur at some time during the months of July, August or September 1998; the subsequent event will occur in the months of January, February, or March 1999. Target compounds shall continue be TPH-gasoline, TPH-diesel, and BTEX. However, you must also determine the presence of the fuel additive methyl-tert butyl ether (MtBE) in all groundwater samples.

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

Sincerely,

  
Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Mee Ling Tung, Director, Environmental Health Department  
Chuck Headlee, RWQCB  
Leroy Griffin, Oakland Fire Department  
Samuel Won, Subsurface Consultants, Inc.

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RO# 359

November 26, 1996  
STID 1040  
page 1 of 2

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

Ms. Marianne Robison  
Buttner Properties  
600 West Grand Ave.  
Oakland CA 94612

RE: Dave's Station, 2250 Telegraph Ave., Oakland CA 94612

Dear Ms. Robison,

Since my last letter to you, dated 3/6/96, the only document received in this office has been the "Supplemental Groundwater Investigation," prepared by Subsurface Consultants, Inc. (SCI), dated 10/4/96. This report documents the results of the temporary well point installation on 5/30/96. Results indicate that the dissolved-phase hydrocarbon plume has migrated off-site towards the east and southeast.

The proposal for two additional downgradient monitoring wells is acceptable, on the condition that they be placed as follows: on the west side of the building at 460 W. Grand Ave, and approximately 35' west of the proposed location in the middle of W. Grand Ave (near well point #3). This was discussed in a telecon with Samuel Won of SCI today. Soil should be sampled and analyzed from the capillary fringe in each of these borings. Please analyze the soil sample in the playground for fraction of organic carbon (foc), moisture content, and bulk density. This information will aid any future risk assessment, and is easier to obtain while doing an existing investigation than it would be in a separate investigation. SCI should use their SOPs with a health and safety plan; previous site-specific health and safety plans should suffice. Therefore, a separate workplan is not necessary.

I understand that the last sampling event was conducted in September 1995. Once the new wells are installed, all six wells should be sampled and monitored on a semi-annual basis (twice per year) in the first and third quarters for the following constituents: TPH-diesel, TPH-gasoline, BTEX. It would be acceptable to sample groundwater in upgradient wells MW1 and MW2 on an annual basis for hydrocarbons (first quarter only). In addition, groundwater in MW1 and MW4 should also be analyzed for HVOCs via Method 8010 on an annual basis (first quarter only).

**Please contact me by phone at least 2 days prior to field work.** Feel free to contact me at 510-567-6761 if you have any questions.

November 26, 1996  
STID 1040  
page 2 of 2  
Ms. Marianne Robison

Sincerely,



Jennifer Eberle  
Hazardous Materials Specialist

cc: Samuel Won, Subsurface Consultants, Inc., 3736 Mt. Diablo Blvd., Suite 200, Lafayette  
CA 94549  
J. Eberle/file

je.1040-C

ALAMEDA COUNTY  
HEALTH CARE SERVICES



RO#359

AGENCY  
DAVID J. KEARS, Agency Director

ARNOLD PERKINS, DIRECTOR

Alameda County Environmental Health Div.  
Mail Code: 430-4580  
Environmental Protection Services  
1131 Harbor Bay Parkway, Room 250  
Alameda CA 94502-6577

March 6, 1996  
STID 1040

Ms. Marianne Robison  
Buttner Properties  
600 West Grand Ave.  
Oakland CA 94612

RE: Dave's Station, 2250 Telegraph Ave., Oakland CA 94612

Dear Ms. Robison,

I am in receipt of the "Work Plan, Investigation of Downgradient Extent of Groundwater Contamination," prepared by Subsurface Consultants, Inc., dated 2/8/96. **This workplan is acceptable for implementation.** Please notify me by telephone at least 2 business days in advance of field activities.

Lastly, I have been informed by Jeriann Alexander of SCI that the fill pipe inside the building has been grouted (2/8/96 telecon).

Feel free to contact me at 510-567-6761 if you have any questions.

Sincerely,

Jennifer Eberle  
Hazardous Materials Specialist

cc: Jeriann Alexander, Subsurface Consultants, Inc., 171-12th St., Suite 201, Oakland CA  
94607  
Tom Peacock/file

je.1040-B



**ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY**

DAVID J. KEARS, Agency Director



R0359

RAFAT A. SHAHID, DIRECTOR

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

STID 1040

November 8, 1995

Ms. Marianne Robison  
Buttner Properties  
600 West Grand Avenue  
Oakland CA 94612

RE: DAVE'S STATION, 2250 TELEGRAPH AVENUE, OAKLAND, CA 94612

Dear Ms. Robison,

This office has received the following documents since Jennifer Eberle's letter to you dated, 7/19/95:

- 1) "Quarterly Groundwater Monitoring, June 1995 Event" prepared by Subsurface Consultants, Inc., dated July 27, 1995.
- 2) "Quarterly Groundwater Monitoring, September 1995 Event" prepared by Subsurface Consultants, Inc., dated October 16, 1995.

As you probably are already aware of, groundwater sampling has been performed for seven consecutive quarters, and groundwater monitoring is now being performed on a semi-annual basis (first and third quarters). Laboratory analysis of groundwater samples taken from monitoring wells MW-3 and MW-4 detected total petroleum hydrocarbons as gasoline (TPHg) at concentrations of 1500 ppb and 3000 ppb and benzene at concentrations of 400 ppb and 12 ppb, respectively, for the September 18, 1995 sampling event.

Monitoring well MW-3 is reportedly in the "inferred" down-gradient direction from the former gasoline UST excavation. Laboratory results for groundwater samples collected from MW-3 for the 9/18/95 sampling event detected concentrations of benzene (400 ppb) at values greater than two (2) orders of magnitude since the 12/22/94 groundwater sampling event (3.8 ppb-benzene). The extent of the ground- water contamination has not been sufficiently defined down gradient of monitoring well MW-3.

Pursuant to provisions of Article 11, Title 23, California Code of Regulations you are required to perform a soil and water investigation (SWI) to define the extent of both soil and groundwater contamination. The investigation will include the installation of at least one additional groundwater monitoring well down gradient of existing monitoring well MW-3.

Ms. Robison  
RE: Dave's Station. 2250 Telegraph Avenue, Oakland  
November 8, 1995  
Page 2 of 2

In order to pursue the SWI in a more cost-effective fashion, this office has suggested that you first employ rapid site assessment tools (e.g. CPT, Geo Probe, Hydropunch, etc.) to qualitatively assess impacts and to define the extent of the contaminant plume **before** proposing final well location(s).

The results of such qualitative work will allow a more informed approach to the siting of additional groundwater monitoring well(s). It is anticipated that during this next phase of the investigation some of the assessment points and resulting monitoring well(s) will need to encroach upon adjoining properties, both public and private.

**This work plan is due within 90 days of the date of this letter, or by February 8, 1996.**  
Work should commence no later than 30 days following approval in writing from this office.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Failure to respond may result in the referral of this case to the RWQCB for enforcement action.

I am temporary covering for Jennifer Eberle in her absence. If you have any questions, please feel free to call me directly at (510)567-6880.

Sincerely,



Dale Klettke, CHMM  
Hazardous Materials Specialist

c:  Gil Jensen, Alameda County District Attorney's Office  
Thomas Peacock--files

**ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY**

DAVID J. KEARS, Agency Director



R0359

RAFAT A. SHAHID, DIRECTOR

July 19, 1995  
STID 1040

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

Ms. Marianne Robison  
Buttner Properties  
600 West Grand Ave.  
Oakland CA 94612

RE: Dave's Station, 2250 Telegraph Ave., Oakland CA 94612

Dear Ms. Robison,

Since my last letter to you dated 9/28/92, the following documents have been received in this office:

- 1) letter from Subsurface Consultants Inc (SCI), dated 11/19/92
- 2) "Former Waste Oil Tank Area Remediation and Groundwater Investigation," prepared by SCI, dated 5/5/94
- 3) "Quarterly Groundwater Monitoring, June 1994 Event," letter report, prepared by SCI, dated 7/25/94
- 4) "Quarterly Groundwater Monitoring, Sept 1994 Event," letter report, prepared by SCI, dated 9/28/94
- 5) "Quarterly Groundwater Monitoring, Dec 1994 Event," letter report, prepared by SCI, dated 1/31/95
- 6) "Quarterly Groundwater Monitoring, March 1995 Event," letter report, prepared by SCI, dated 4/28/95

As per a telephone conversation today between myself and Jeriann Alexander of SCI, groundwater was sampled in July 1995. This makes a total of six consecutive quarterly groundwater sampling events. The groundwater concentrations are relatively low to moderate, and appear relatively consistent from event to event. Subsurface soils consist primarily of silty and sandy clays. For these reasons, it would be acceptable to continue groundwater monitoring and sampling on a biannual (twice per year) basis.

July 19, 1995  
STID 1040  
Ms. Marianne Robison  
page 2 of 2

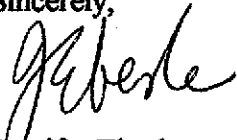
Excavation activities occurred in the vicinity of the former waste oil tank in February 1994. Concentrations of soil contaminants left in place include the following maximum concentrations: 240 ppm TPH-gasoline, 680 ppm TPH-diesel, 1,700 ppm TPH-motor oil, 3,900 ppm Oil & Grease, 0.580 ppm benzene, and 590 ppm lead, as well as various halogenated volatile organic compounds (HVOCs), and semi-VOCs. Much of this contamination was found in the sidewalls of the excavation, notably one wall adjacent to the east side of the station building.

In addition, elevated concentrations of soil contaminants were detected in the vicinity of MW1 and MW3 during well installation. **Due to these "residual" concentrations of soil contaminants, further work will be needed prior to closing this case.** These may involve further remediation and/or risk assessment.

Lastly, it was noted during my site visit on 2/9/94 that the waste oil tank had a remote fill, located inside the station building. This fill spout contained sludge, which needs to be removed, and the fill spout grouted to prevent further infiltration. This was noted in my field report dated 2/9/94. Please respond as to the status of the remote fill, and document grouting activities with photos.

Feel free to contact me at 510-567-6761 if you have any questions.

Sincerely,



Jennifer Eberle  
Hazardous Materials Specialist

cc: Jeriann Alexander, Subsurface Consultants, Inc., 171-12th St., Suite 201, Oakland CA  
94607  
Tom Peacock/file

je.1040-A

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0359

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

Certified Mailer # P 113 815 164

September 28, 1992

STID 1040

Marianne & William Robison  
Commercial & Industrial Supply  
600 W. Grand Av.  
Oakland CA 94612

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: Dave's Station  
2250 Telegraph Av.  
Oakland CA 94612

Dear Mr. & Mrs. Robison,

We last wrote to you on May 22, 1992 concerning the above referenced site. In that letter, we conditionally approved the July 1, 1991 "Underground Tank Closure and Future Services Work Plan," prepared by your consultant, Subsurface Consultants, Inc. (SCI). I spoke with Jeriann Alexander of SCI today regarding the status of the work plan. Ms. Alexander indicated that the work plan has not yet been implemented, and that there were no immediate plans for any work at this site. Therefore, we require that you implement the workplan within 45 days or by November 12, 1992. The conditions under which the workplan were approved as per our May 22, 1992 letter are the following:

- 1) The soil at the former waste oil tank area will be overexcavated prior to monitoring well installation.
- 2) EPA test method 8240 for BTEX will be added to the analyses for soil sampling associated with the former waste oil tank.
- 3) Since the groundwater flows southwest at the nearby Exxon station (2225 Telegraph Ave.), the monitoring well near D3/D4 will be relocated closer to D3/D4 so as to be downgradient.
- 4) As discussed on page 14, onsite biotreatment was proposed for contaminated soil. This must be re-evaluated as a remedial option in light of laboratory analysis results for lead (151 ppm).

These issues were discussed by telephone between Jeriann Alexander of SCI and myself on 5/22/92.

Marianne & William Robison  
STID 1040  
page 2 of 2  
September 28, 1992

If you have any questions, please contact me at 510-271-4530.

Sincerely,



Jennifer Eberle  
Hazardous Materials Specialist

cc: Jeriann Alexander, Subsurface Consultants, Inc., 171-12th  
St., Ste 201, Oakland CA 94607  
Rich Hiett, RWQCB  
Ed Howell/File

je 1040

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID W. BEARS, Agency Director



R0357

DAVID W. BEARS, Agency Director

May 22, 1992

STID #1040

Marianne & William Robison  
Commercial & Industrial Supply  
600 W. Grand Av.  
Oakland CA 94612

RE: Dave's Station  
2250 Telegraph Ave.  
Oakland CA 94612

Dear Ms. & Mr. Robison,

The case file for the above referenced site has recently been reviewed by our staff. The case has been reassigned to Jennifer Eberle, Hazardous Materials Specialist. Please mail future correspondence to her attention.

We are in receipt of the Underground Tank Closure and Future Services Work Plan, prepared by Subsurface Consultants, Inc., dated July 1, 1991 for the above referenced site. The Work Plan has been reviewed and approved with the following understandings:

- 1) The former waste oil tank area will be overexcavated prior to monitoring well installation.
- 2) Benzene, toluene, ethylbenzene, and xylenes will be added to the analyses for the waste oil excavation. EPA test method 8240 will be utilized.
- 3) Since the groundwater gradient at the nearby Exxon station (2225 Telegraph Ave.) is southwest, the monitoring well near D3/D4 will be relocated closer to D3/D4 so as to be downgradient.
- 4) As discussed on page 14, onsite biotreatment was proposed for contaminated soil. This must be re-evaluated as a remedial option in light of laboratory analysis results for lead.

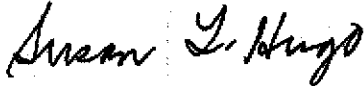
These issues have been discussed between Jennifer Eberle of our staff and Jeriann Alexander of Subsurface Consultants Inc. on May 22, 1992.

DEPARTMENT OF ENVIRONMENTAL HEALTH SERVICES  
Hazardous Materials Division  
30 Swan Way, 3rd. Fl.  
Oakland, CA 94612  
510/577-4320

Marianne & William Robison  
STID #1040  
Page 2 of 2  
May 22, 1992

If you have any questions, please phone Jennifer Eberle at 510-271-4320.

Sincerely,



Susan Hugo  
Senior Hazardous Materials Specialist

cc: Jeriann Alexander, Subsurface Consultants, Inc., 171-12th St.,  
Ste 201, Oakland CA 94607  
Rich Hiatt, RWQCB  
File

je



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0359

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

Certified Mailer #P 367 604 315

May 23, 1991

Mr. William C. Robison  
600 West Grand Ave., Suite 200  
Oakland, CA 94612

**Re: Commercial and Industrial Supply Co., 2250 Telegraph Ave.,  
Oakland, CA 94612**

Dear Mr. Robison,

Alameda County Environmental Health Department, Hazardous Materials Division is in receipt of preliminary analytical results taken from beneath the former underground storage tanks (usts) located at the above address. However, to date, a tank closure report including the actual laboratory results and including copies of the hazardous waste manifests for the usts and for any removed soils have not been received by this office.

Alameda County Environmental Health Department, Hazardous Materials Division has currently been delegated authority from the San Francisco Regional Water Quality Control Board (RWQCB) to oversee a large number of remediation cases within Alameda County. Therefore, we will be the lead contact agency for the oversight duties with regard to this case.

Preliminary sampling data indicated Total Volatile Hydrocarbons (TVH) in soil as high as 1700 ppm and benzene as high as 2300 ppm. Lead levels in samples taken from the waste oil excavation revealed contamination as high as 201 ppm. In order to properly characterize soil samples taken from the former waste oil excavation you are required to determine the soluble threshold limit concentration (stlc) for lead in soil samples taken from this area.

A letter dated November 23, 1990 from Subsurface Consultants to this office reported that soil excavation and aeration has occurred on site.

According to the Tri-Regional recommendations, when contamination to soil of either Total Petroleum Hydrocarbons (TPH) or Oil and Grease (O&G) exceeding 100 ppm are encountered a groundwater investigation is required. You are required to install monitoring wells in order to determine the impact to groundwater and also in order to determine the hydraulic gradient.

You are requested to submit a work plan proposal within 45 days of the receipt of this letter. The work plan should include the investigative and remedial measures proposed in dealing with soil contamination and also in investigating the possible impact to groundwater at the above site.

Mr. Robison  
May 23, 1991  
Page 2 of 3

All work must be performed according to RWQCB documents:

Leaking Underground Fuel Tank Field Manual revised October 1989

Tri-Regional Board Staff recommendations for Initial Evaluation and Investigation of Underground Storage Tanks 2 June 1988, revised 10 August 1990.

Appendix A of the Tri-Regional Recommendations (see enclosure) Copies of these documents can be obtained by calling the SFRWQCB data management group at 464-1269. Please note the LUFT manual as a whole has not been adopted by the SFRWQCB.

The work plan must be prepared by CA-Certified Engineering Geologist, CA-Registered Geologist or a CA-Registered Civil Engineer and should include a proposal to identify and address subsurface contamination. It should include but shall not be limited to a depiction of the proposed locations for monitoring well installations and a sampling plan including sampling type and frequency. The work plan proposal must also address existing soil contamination on site

The technical report should be submitted with a cover letter from the environmental professional you have chosen to oversee the subsurface contamination and must be received in this office by the established due date. The letter must be signed by a principal executive officer or by an authorized representative of that person.

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and to:

Lester Feldman  
Regional Water Quality Control Board, San Francisco Bay Region  
2101 Webster Street, Suite 500  
Oakland, California 94612  
(415) 464-1255

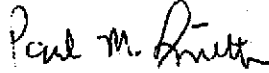
You should be aware that this Division is working in conjunction with the SFRWQCB and that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b).

You are also requested to complete and submit the enclosed Unauthorized Release Form to this office within 10 days of the receipt of this letter.

Mr. Robison  
May 23, 1991  
Page 3 of 3

Should you have any questions pertaining to any of the above requests please contact me at 415/ 271-4320.

Sincerely,



Paul M. Smith  
Hazardous Materials Specialist

Enclosures (2)

cc:

Jerriann N. Alexander, Subsurface Consultants, Inc.  
Lester Feldman, SFRWQCB  
Charlene Williams, DHS  
Gil Jensen, Alameda County District Attorney's Office of  
Consumer and Environmental Affairs  
Rafat A. Shahid, Assistant Agency Director, Alameda County  
Environmental Health Department