



June 28, 2001  
Projects No. C80-000500C1/001127C1

Ms. Susan Hugo  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway  
Alameda, California 94502-6577

Re: **Underground Storage Tank Case Closure Requests**  
**Former Texaco/Former Exxon Service Station**  
**500 Grand Avenue** *Ro 391*  
**Oakland, California**  
**Incident No. 88870189**

**Former Texaco Service Station**  
**1127 Lincoln Avenue** *rs 86*  
**Alameda, California**  
**Incident No. 90015162**

Dear Ms. Hugo:

On behalf of Equiva Services LLC (Equiva), KHM Environmental Management, Inc. (KHM) wishes to inquire as to the status of case closure requests for the two above referenced sites. The case closure requests for the former Texaco service stations located at 500 Grand Avenue, Oakland and 1127 Lincoln Avenue, Alameda have been under review by the Alameda County Health Services Agency (ACHSA) for over four months. As far as KHM is aware, neither case closure package has yet been forwarded to the Regional Water Quality Control Board for their review.

### **500 GRAND AVENUE, OAKLAND, CALIFORNIA**

Discussions regarding case closure for the 500 Grand Avenue site began in October 2000. In a telephone conversation on October 3, 2000 with Ms. Krissy Flesoras of KHM, you stated that the 500 Grand Avenue site was a definitely a candidate for case closure. During the conversation, you eliminated the site requirement for groundwater monitoring of standard petroleum hydrocarbon parameters [total purgeable petroleum hydrocarbons

(TPPH), benzene, toluene, ethylbenzene, and xylene (BTEX), and methyl tert-butyl ether (MTBE)] in anticipation of case closure. A one-time analysis for oil and grease and diesel by the silica-gel method was requested. KHM submitted a quarterly monitoring report on January 8, 2001 containing the results of the additional analysis.

On January 19, 2001, after review of the oil and grease and diesel data, you indicated again that the 500 Grand Avenue case appeared closable. KHM submitted a set of completed Case Closure Summary forms and a Case Closure Request report to ACHSA on February 13, 2001. In a follow-up telephone call to you on April 9, 2001, you indicated that you never received the Case Closure Request report from KHM. A copy of the Case Closure Request report was delivered to you by FedEx on April 10, 2001. A call was placed to you on May 29, 2001 to inquire as to the status of the closure process. As of date, we have not received a response.

### **1127 LINCOLN AVENUE, ALAMEDA, CALIFORNIA**

The case closure process for the 1127 Lincoln Avenue site began in 1999. A Case Closure Request report, prepared by Pacific Environmental Group, Inc., was submitted to ACHSA on May 27, 1999. KHM, in order to expedite the closure review process, submitted completed Case Closure Summary forms to Mr. Barney Chan of ACHSA on January 26, 2001.

During review of the case files, Mr. Chan developed a series of questions/comments regarding the site. Mr. Chan, in a telephone conversation of January 25, 2001, convey his comments/questions while assuring me that he still viewed the site as closeable. Mr. Chan sent me his questions and comments in an email dated January 25, 2001. KHM submitted a written response to Mr. Chan's questions and comments dated February 1, 2001.

In a telephone conversation on February 12, 2001, Mr. Chan stated that he had completed his review of the closure request, recommended case closure, and sent the closure package on to a peer at the ACHSA for an additional review. In a telephone conversation on March 14, 2001, Mr. Chan stated that the peer review process had been completed. The peer reviewer had concurred with Mr. Chan's recommendation for case closure. The package was now on his supervisor's desk for signature. Mr. Chan stated, that with a normal 30-day review period by Regional Water Quality Control Board (RWQCB), Equiva could reasonably expect a letter granting case closure by the end of April 2001.

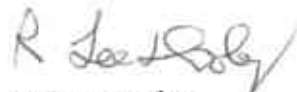
Approximately three months passed without receiving any information regarding the case closure request. I called Mr. Chan on June 15, 2001. Mr. Chan informed me that the closure package was still awaiting approval by his supervisor and had not yet been sent to the RWQCB. Mr. Chan had no idea on how long the signature process might take.

## REQUEST

KHM appreciates the heavy workload of the ACHSA. However, the period for review of the two requested case closures does seem protracted. We would greatly appreciate your expediting the signature process for the 500 Grand Avenue, Oakland and 1127 Lincoln Avenue, Alameda case closure requests so that they may be forwarded to the RWQCB for final review. We would appreciate notification when ACHSA has completed its review process and the case closure requests have been sent to the RWQCB.

Please call me at (408) 224-4724 or email me at [ldooley@khm1.com](mailto:ldooley@khm1.com) with any questions regarding this matter.

Sincerely,  
**KHM Environmental Management, Inc.**



R. Lee Dooley  
Senior Hydrogeologist  
CHG 183

cc:

Ms. Karen Petryna, P.E., Equiva Services LLC, P.O. Box 7869, Burbank, CA 91510-7869

Mr. Chuck Headlee, California Regional Water Quality Control Board, San Francisco Bay Region, 1515 Clay Street, Suite 1400, Oakland, CA 94612