

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

December 22, 2000

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Rd., Suite 100
Auburn Hills, MI 48326

Dear Mr. Moffatt:

Subject: Broadway Volkswagen, 2740 Broadway Ave., Oakland, CA 94612
StId 470

"Sampling & Closure Report, Property #4826..." dated March 24, 2000 prepared by Environmental Science & Engineering was reviewed. We do not agree with its conclusion that case closure is warranted because:

- 1) The most recent groundwater sample from monitoring well, MW-3, collected on August 3, 1999, showed a discernible increase for all contaminants. The concentrations for TPH-G and BTEX were 21,000 ug/l, 5,500 ug/l, 2,300 ug/l, 470 ug/l, and 990 ug/l, respectively. The prior samples collected on 12/13/96 and 10/7/97 were NonDetectable (ND) or close to ND for all contaminants. The increase in contaminant concentrations may indicate that the plume has not stabilized. Therefore, groundwater monitoring needs to be continued. Additionally, include vapor wells, VW-1, 2, and 3, for groundwater monitoring to better characterize the plume.
- 2) Risk assessment should use the Oakland Risk Based Corrective Action (RBCA) levels instead of Preliminary Remediation Goals (PRG). The Oakland RBCA levels are intended to address human health and environmental concerns at sites in Oakland. For information about the Oakland RBCA process, contact Mark Gomez of the City of Oakland Public Works Agency, Environmental Services Division, 510/238-7314.

Other information needed include:

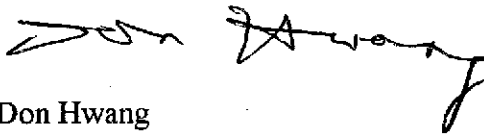
- a) Groundwater gradient maps for January 21, 1989, June 27, 1996, September 19, 1996, December 13, 1996, and October 7, 1997, to evaluate the movement of the plume.
- b) Whether the Halogenated Volatile Organic Compounds (HVOC's) onsite result from an onsite or an offsite source. Although HVOC's may be handled separately, it would seem to be advantageous to incorporate sampling and analyses for HVOC's when samples for other contaminants are collected.
- c) Remediation of the HVOC's may be required unless the concentrations are less than RBCA levels and are stable.

Submit a workplan to satisfy the above issues.

Mr. Moffat
December 22, 2000
Page 2 of 2

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

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hwang". The signature is written in a cursive, somewhat stylized font.

Don Hwang
Hazardous Materials Specialist

cc
C: Thomas Dalzell, QST Environmental, Inc., 1320 Arnold Dr., Suite 236, Martinez, CA
94553

✓ file

**ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION
DEPOSIT / REFUND ACCOUNT SHEET**

printed 07/14/99

SITE INFORMATION

Broadway Volkswagen
2740 Broadway
Oakland 94612
Site Contact:
Site Phone :

StID: 470	Site#: 76
PROJECT#: 76c	
PROJECT TYPE: *** M	***
INSP: Eva Chu JM	
ACCT. SHEET PG #:	

PROPERTY OWNER INFORMATION

Vorelco Inc.
888 W. Big Beaver
Troy, Mi 48007
Owner Contact: Tom Moffatt
Owner Phone :

PAYOR INFORMATION

Tramwell Inc,
3800 Hamlin Rd, Suite 100
Auburn, MI 48836 #1183
Payor Contact:
Payor Phone :

Date	Action Taken	Time		Hours Spent/ Depstd	Hour Balnce	Money Spent/ Depositd	Money Balance
		In	Out				
	Balance from Prev. Page	
	Rcpt# 800489						
06/28/99	Deposit of \$1,500.00 @\$100/hour			+15.	15	+\$1,500.00	1,500.00
08/11/99	Wrote letter to Tom Moffatt & faxed			0.6	14.4	60.00	1,440.00
08/11/99	Administrative			1	13.4	100.00	1,340.00
11/16/99	left message for Tom Moffatt & spoke to John Dalzell			0.2	13.2	20.00	1320.00
11/27/99	Received message from Tom Moffatt & copied in files			0.2	13.0	20.00	1300.00
12/14/00	REVIEW REPORTS			2			
12/15/00	✓			3			

UPON COMPLETION OF PROJECT

PROJ COMPLETED BY : _____ ATTACH: State Forms A, B & C Billing Adjustment

DATE OF COMPLETION : _____ DATE SENT TO BILLING: _____

TOTAL COST OF PROJECT: _____ REFUND AMOUNT: _____ Rev. 5/:

* Billing adjustment forms needed when site is in our UST program.

LOP - CHANGE RECORD REQUEST FORM

printed:
12/29/1999

Mark Out What Needs Changing and Hand to LOP Data Entry
(Name/Address changes go to Annual Programs Data Entry)

Insp:

AGENCY # : 10000 SOURCE OF FUNDS: F SUBSTANCE: 8006619
StID : 470 LOC: -0-
SITE NAME: Broadway Volkswagen DATE REPORTED : 08/15/1988
ADDRESS : 2740 Broadway DATE CONFIRMED: 08/15/1988
CITY/ZIP : Oakland 94612 MULTIPLE RPs : Y

SITE STATUS

CASE TYPE: O CONTRACT STATUS: 4 PRIOR CODE:1C2 EMERGENCY RESP: -0-
RP SEARCH: S DATE COMPLETED: 03/20/1992
PRELIMINARY ASMNT: U DATE UNDERWAY: 10/01/1991 DATE COMPLETED: -0-
REM INVESTIGATION: - DATE UNDERWAY: -0- DATE COMPLETED: -0-
REMEDIAL ACTION: - DATE UNDERWAY: -0- DATE COMPLETED: -0-
POST REMED ACT MON:- DATE UNDERWAY: -0- DATE COMPLETED: -0-

ENFORCEMENT ACTION TYPE: 1 DATE ENFORCEMENT ACTION TAKEN: 03/20/1992
LUFT FIELD MANUAL CONSID: 3HSCAW
CASE CLOSED: - DATE CASE CLOSED: -0-
DATE EXCAVATION STARTED : 08/01/1988 REMEDIAL ACTIONS TAKEN: ED

RESPONSIBLE PARTY INFORMATION

RP#1-CONTACT NAME: Tom Moffatt
COMPANY NAME: Vorelco Inc. 4A01
ADDRESS: 3800 Hamlin Rd.
CITY/STATE: Auburn Hills, Mi 48326

RP#2-CONTACT NAME: n/a
COMPANY NAME: Broadway Volkswagen
ADDRESS: 2740 Broadway
CITY/STATE: Oakland C A 94612

INSPECTOR VERIFICATION:

NAME _____ SIGNATURE _____ DATE _____

DATA ENTRY INPUT:

Name/Address Changes Only Case Progress Changes
ANNPGMS _____ LOP _____ DATE _____ LOP _____ DATE _____

Don - Please take over this case - note the complex geology. Phabs Don

5710470

Trammell Crow Company

December 15, 1999

Ms. Juliet Shin R.G.
Alameda County Environmental Health Service
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

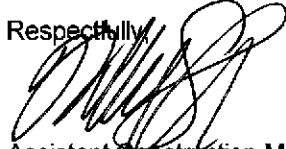
Dear Ms. Shin,

Subject: Broadway Volkswagen, 2740 Broadway, Oakland

Pursuant to previous correspondence dated August 16, 1999 I am issuing the following update on Trammell-Crow's activity. In an effort to determine if the contamination could be linked to a previous entity, Trammell-Crow reviewed a 100 year title search compiled by Chicago Title Company. However, the title search offered limited information, none of which could potentially link the source of contamination to a previous entity.

Trammell-Crow has unsuccessfully attempted to locate the former service manager of the facility to either confirm or deny the HVOC use, which is not typically used in dealership. In addition, Trammell-Crow has analyzed archived data from soil analysis performed when the service facility was reconstructed after the 1989 earthquake. As is evidenced by the results of the attached soil samplings, no HVOCs were detected in the soils where the in-ground hoists were removed. Since it has been previously established that the HVOC contamination exists at a level below the impervious clay barrier provides further support for the theory that an off-site source is responsible for the conditions that currently exist. Trammell-Crow has thoroughly investigated the situation and feels very strongly that Volkswagen has not contributed to, nor is responsible for the contamination of the site. Unless written notification is received from your office, Trammell-Crow will consider this matter closed. If you have any questions, you can contact me at (248) 340-5748

Respectfully,



Assistant Construction Manager
William Schumacher
Trammell-Crow Automotive Realty Services

cc: Tom Moffatt,
Senior Construction Manager
Trammell-Crow Automotive Realty



GSX Services
 Lokern Facility
 2500 West Lokern Road
 P.O. Box 787
 Buttonwillow, CA 93206
 (805) 762-7372

GENERATOR'S NAME: VOREL CO./BROADWAY
 SAMPLE DESCRIPTION: SOIL/HYDROLIC OIL

DATE REPORTED: 06-01-9
 DATE RECEIVED: 06-01-9
 LABORATORY NO.: 618

Total Metal Concentrations (mg/kg)

Analytical Method:
 Ref.

Arsenic (As)				
Barium (Ba)	177		7061	1
Cadmium (Cd)	ND		7080	1
Chromium (Cr)	27.5		7130	1
Copper (Cu)	19.5		7190	1
Lead (Pb)	100		220.1	2
Mercury (Hg)			7421	2
Nickel (Ni)	37		7471	2
Selenium (Se)			7520	2
Silver (Ag)	ND		7741	2
Thallium (TI)	ND		7760	2
Vanadium (V)	40		279.1	2
Zinc (Zn)	173		286.1	2
			289.1	2

	Spot Test	Total	Dissolved	Reactive
Cyanide	NEGATIVE			
Sulfide	NEGATIVE			
Hexavalent Chromium	NEGATIVE			
Total Organic Halogens	NEGATIVE			
Flouride	POSITIVE	1.4		
Ammonia	NEGATIVE			
Formaldehyde	NEGATIVE			
Phenols	NEGATIVE			
Absorbancy	PASS			

% Solids	91
% Oil	(-)1
% Water	9
Flashpoint (PMCC)	
pH	9.54
Specific Gravity	1.86 @23.0° C

(-) indicates "less than"

- (1) "Test Methods for Evaluating Solid Wastes", SW846, July, 1982
 (2) "Method for Chemical Analysis of Water and Wastes",
 EPA-600, 14-79-020

99 AUG 17 AM 8: 36

August 16, 1999

Ms. Juliet Shin, R.G.
Hazardous Materials Specialist
Alameda County, Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Subject: Broadway Volkswagen, 2740 Broadway, Oakland, CA

Dear Ms. Shin:

As we have stated in the past, we do not feel at this point that the HVOC contamination is a result of activities at the subject site. Our analytical results point to an off site source and the data taken from when the tanks were removed support this fact. In addition the HVOC's found are not "standard" products that you would find at an automobile sales and service facility.

Given these facts, I feel very strongly that we need to fully determine if there is anything in the historical uses of the facility that would lead us to believe that the contamination resulted from activities at our site. We have ordered a 100-year title search for the property. This will give us some insight into the uses of the facility, prior to our ownership.

Once we have received the title search (due to us in early September), we will attempt to contact prior owners of the property as well as current and former employees of Broadway Volkswagen. Through interviews with these parties we hope to be able to confirm or deny the HVOC use.

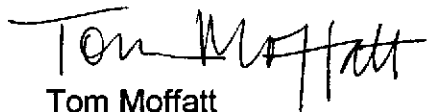
The Schedule of Work (SOW) is outlined below:

- | | |
|---|--------------|
| • Receive & review 100 year title search | 9-17-99 |
| • Contact & interview former owners & employees | 10-15-99 |
| • Summarize HVOC position | 10-29-99 |
| • Meeting with Alameda County to review | Mid-November |

Our ultimate course of action will depend on whether or not we feel that our site has caused or contributed to the contamination. Once the investigative work has been completed and we have a chance to review our findings with your office, we will submit a proposed action plan.

If you have any questions, you can contact me at (248) 340-5503. If I do not hear from you I will proceed as outlined in the SOW above.

Sincerely,

A handwritten signature in black ink that reads "Tom Moffatt". The signature is written in a cursive style with a prominent horizontal line across the top of the letters.

Tom Moffatt
Sr. Construction Manager

Cc: Tom Dalzell – Environmental Science & Engineering



Environmental Science & Engineering, Inc.
A MACTEC COMPANY

Date: 08-11-99

Number of pages including cover sheet: 2

Job Number: _____

Task Number: _____

FAX

To: JULIET SHIN

Phone: _____

Fax phone: 510-337-9335

CC: _____

From: THOMAS D. DALZELL

Environmental Science & Engineering

Martinez Office

Phone: 925-313-0840

Fax phone: 925-313-0844

REMARKS: Urgent For your review Reply ASAP Please comment

JULIET:

FHI

TDD

Trammell Crow Company

Tom Moffatt
Senior Construction Manager
thomas.moffatt@tcw.com
Trammell Crow Corporate Services
Trammell Crow Automotive Realty Services, Inc.
3600 Hamlin Road, Suite 100 Auburn Hills, Michigan 48326-2629
248-340-5500 (Main) 248-340-5509 (Direct)
248-340-5525 (Fax) 248-613-1453 (Mobile)

j:\admin\admin\fax2.doc

Trammell Crow Company

Tom Moffatt

Senior Construction Manager

thomas.moffatt@tcw.com

Trammell Crow Corporate Services

Trammell Crow Automotive Realty Services, Inc.

3800 Hamlin Road, Suite 100 Auburn Hills, Michigan 48326-2829

248-340-5500 (Main) 248-340-5503 (Direct)

248-340-5525 (Fax) 248-613-1453 (Mobile)

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
953	925 313 0844	08-11 07:56	00' 26	01/01	OK		

7499402045

Alameda County Environmental Health

1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
Telephone (510) 567-6700 FAX (510) 337-9335

FACSIMILE COVER SHEET

TO:

Tom Datzell, Fax: 925-313-0844

FROM:

Juliet Shin

DATE:

08/11/99

Total number of pages including cover sheet

2

-NOTES-

Tom, Please forward this fax to
Tom Moffatt. I don't have his fax #. Thanks.
Have a good day.

- Juliet Shin

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

August 11, 1999

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Road, Ste 100
Auburn Hills, MI 48326

STID: 470

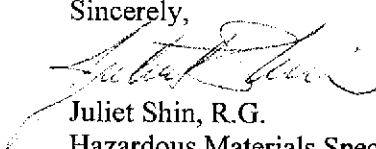
Re: HVOCs investigations at the Broadway Volkswagen site, located at 2740 Broadway Ave., Oakland, CA

Dear Mr. Moffatt,

On June 15, 1999, this office sent you a letter requiring you to submit a workplan addressing the HVOCs issue at the above site by July 27, 1999. Your consultant Thomas Dalzell, Environmental Science & Engineering, Inc., submitted a letter dated July 16, 1999 stating that he would forward a review of historical uses at the site to Alameda County (County). Additionally, per your message on August 10, 1999, you stated that you had ordered a title search for the site and were planning to conduct interviews to obtain more information on possible HVOCs before submitting a proposal to the County. Since the initial workplan due date of July 27, 1999 has passed, this office is requiring that you submit a **Schedule of Work (SOW)** detailing the various phases of your intended research and the submittal of your proposal, as well as when each phase of work will be completed. **This SOW must be submitted within the next two weeks (i.e., by August 25, 1999).**

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

Sincerely,



Juliet Shin, R.G.

Hazardous Materials Specialist

Cc: Thomas D. Dalzell
1340 Arnold Dr., Ste 126
Martinez, CA 94553-4189

Derek Lee, RWQCB

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
954	925 313 0844	08-11 07:57	00' 30	01/01	OK		

7499402046

ALAMEDA COUNTY
HEALTH CARE SERVICESAGENCY
DAVID J. KEARS, Agency Director

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

August 11, 1999

Tom Moffatt
 Vorelco, Inc.
 3800 Hamlin Road, Ste 100
 Auburn Hills, MI 48326

STID: 470

Re: HVOCs investigations at the Broadway Volkswagen site, located at 2740 Broadway Ave., Oakland, CA

Dear Mr. Moffatt,

On June 15, 1999, this office sent you a letter requiring you to submit a workplan addressing the HVOCs issue at the above site by July 27, 1999. Your consultant Thomas Dalzell, Environmental Science & Engineering, Inc., submitted a letter dated July 16, 1999 stating that he would forward a review of historical uses at the site to Alameda County (County). Additionally, per your message on August 10, 1999, you stated that you had ordered a title search for the site and were planning to conduct interviews to obtain more information on possible HVOCs before submitting a proposal to the County. Since the initial workplan due date of July 27, 1999 has passed, this office is requiring that you submit a **Schedule of Work (SOW)** detailing the various phases of your intended research and the submittal of your proposal, as well as when each phase of work will be completed. **This SOW must be submitted within the next two weeks (i.e., by August 25, 1999).**

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

Sincerely,

Juliet Shin, R.G.
 Hazardous Materials Specialist

Cc: Thomas D. Dalzell



Environmental Science & Engineering, Inc.
A MACTEC COMPANY

Date: 08-05-99

Number of pages including cover sheet: 2

Job Number: 65-99-068

Task Number: 0900

FAX

To: JULIET SHIN

Phone: 510-567-6763

Fax phone: 510-337-9335

CC: TOM MUFFETT
248-340-5526

From: THOMAS D. DAZELL

Environmental Science & Engineering

Martinez Office

Phone: 925-313-0840

Fax phone: 925-313-0844

REMARKS: Urgent For your review Reply ASAP Please comment

j:\admin\admin\fax2.doc

Page 1

white - env. health
yellow - facility
pink - files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Inspection Form

II, III

II.A BUSINESS PLANS (Title 19)

- 1. Immediate Reporting 2703
- 2. Bus. Plan Stds. 25503(b)

Site ID # _____ Site Name Broadway Volkswagen Today's Date 08/05/99
 Site Address 2740 Broadway
Oakland Zip 94 Phone _____
 MAX AMT stored > 500 lbs, 55 gal., 200 cft.?



Thomas D. Dalzell
 Office Manager / Senior Scientist
 925.313.0840, Cell 925.518.0607
 Fax 925.313.0844
 1340 Arnold Dr., Suite 126
 Martinez, CA 94553-4189
 E-MAIL tddalzell@esemail.com www.eseworld.com

- Inspection Categories:**
- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
 - II. Business Plans, Acute Hazardous Materials
 - III. Underground Tanks

Administration Code (CAC) or the Health & Safety Code (HS&C)

19. Trade Secret Requested? 25538

III. UNDERGROUND TANKS (Title 23)

- | | |
|--|---|
| General | <input type="checkbox"/> 1. Permit Application 25284 (H&S) |
| | <input type="checkbox"/> 2. Pipeline Leak Detection 25292 (H&S) |
| | <input type="checkbox"/> 3. Records Maintenance 2712 |
| | <input type="checkbox"/> 4. Release Report 2651 |
| | <input type="checkbox"/> 5. Closure Plans 2670 |
| Monitoring for Existing Tanks | <input type="checkbox"/> 6. Method |
| | 1) Monthly Test |
| | 2) Daily Vadose
Semi-annual groundwater
One time soils |
| | 3) Daily Vadose
One time soils
Annual tank test |
| | 4) Monthly Groundwater
One time soils |
| | 5) Daily Inventory
Annual tank testing
Cont pipe leak det
Vadose/gndwater mon. |
| | 6) Daily Inventory
Annual tank testing
Cont pipe leak det |
| | 7) Weekly Tank Gauge
Annual tank testing |
| | 8) Annual Tank Testing
Daily Inventory |
| | 9) Other _____ |
| New Tanks | <input type="checkbox"/> 7. Precs Tank Test 2643 |
| | Date: _____ |
| | <input type="checkbox"/> 8. Inventory Rec. 2644 |
| | <input type="checkbox"/> 9. Soil Testing 2646 |
| <input type="checkbox"/> 10. Ground Water 2647 | |
| <input type="checkbox"/> 11. Monitor Plan 2632 | |
| <input type="checkbox"/> 12. Access, Secure 2634 | |
| <input type="checkbox"/> 13. Plans Submit 2711 | |
| Date: _____ | |
| <input type="checkbox"/> 14. As Built 2635 | |
| Date: _____ | |

Comments:

Came out to site at 7:00 AM to oversee soil sampling from locations adjacent to former Burnings SB-4 and SB-3. OST consultants and Gregg Drilling at already begun replacing the pushing the location adjacent to SB-4. They went down to 0'4' bgs + had poor recovery of pea gravel. This is because there was no core catcher in it. They put in a core catcher + tried again. Soil down to 12' bgs is only pea gravel w/ poor recovery. Gravel was observed in the 8' to 12' bgs interval. Petroleum odor was detected in the sand and clay from the 12- to 16-foot intervals. A soil sample was collected from 13.8- to 15.8 feet bgs. This sample has sand from ~ 13.5- to 14.5-foot bgs and clay from about 14.5- to 15.8-foot bgs. I requested that both the sand from the sand lens + clay be sampled, so Tom Dalzell, OST, said that he would divide this sample into two.

Contact: THOMAS D. DALZELL

Title: SENIOR SCIENTIST

Signature: [Signature]

Inspector: Juliet Shin

Signature: [Signature]

II, III

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Inspection Form

II, III

white -env.health
yellow -facility
pink -files

Site ID # _____ Site Name Broadway Volkswagen Today's Date 08/05/99

Site Address 2740 Broadway

City Oakland Zip 94 Phone _____

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

Came out to site at 7:00AM to oversee soil sampling from locations adjacent to former Benings SB-4 and SB-3. OST Consultants and Gregg Drilling at already begun sampling the location adjacent to SB-4. They went down to 0-4' bgs + had poor recovery of pea gravel. This is because there was no core catcher in it. They put in a core catcher + tried again. Soil down to 12' bgs is only pea gravel w/ poor recovery. G.W. was observed in the 8' to 12' bgs interval. A Petroleum odor was detected in the sand and clay from the 12- to 16-foot intervals. A soil sample was collected from 13.8- to 15.8-foot bgs. This sample has sand from ~13.5- to 14.5-foot bgs and clay from about 14.5- to 15.8-foot bgs. I requested that both the sand from the sand lens + clay be sampled, so Tom Dalzell, OST, said that he would divide this sample into two.

II.A BUSINESS PLANS (Title 19)

- 1. Immediate Reporting 2703
- 2. Bus. Plan Stds. 25503(b)
- 3. RR Cars > 30 days 25503.7
- 4. Inventory Information 25504(a)
- 5. Inventory Complete 2730
- 6. Emergency Response 25504(b)
- 7. Training 25504(c)
- 8. Deficiency 25505(a)
- 9. Modification 25505(b)

II.B ACUTELY HAZ. MATLS

- 10. Registration Form Filed 25533(a)
- 11. Form Complete 25533(b)
- 12. RMPP Contents 25534(c)
- 13. Implement Sch. Req'd? (Y/N)
- 14. OffSite Conseq. Assess. 25524(c)
- 15. Probable Risk Assessment 25534(d)
- 16. Persons Responsible 25534(g)
- 17. Certification 25534(f)
- 18. Exemption Request? (Y/N) 25536(b)
- 19. Trade Secret Requested? 25538

III. UNDERGROUND TANKS (Title 23)

- General
- 1. Permit Application 25284 (H&S)
 - 2. Pipeline Leak Detection 25292 (H&S)
 - 3. Records Maintenance 2712
 - 4. Release Report 2651
 - 5. Closure Plans 2670

- Monitoring for Existing Tanks
- 6. Method
 - 1) Monthly Test
 - 2) Daily Vadose Semi-annual groundwater One time soils
 - 3) Daily Vadose One time soils Annual tank test
 - 4) Monthly Groundwater One time soils
 - 5) Daily Inventory Annual tank testing Cont pipe leak det Vadose/gndwater mon.
 - 6) Daily Inventory Annual tank testing Cont pipe leak det
 - 7) Weekly Tank Gauge Annual tank testing
 - 8) Annual Tank Testing Daily Inventory
 - 9) Other _____

- 7. Precs Tank Test Date: 2643
- 8. Inventory Rec. 2644
- 9. Soil Testing 2646
- 10. Ground Water. 2647

- New Tanks
- 11. Monitor Plan 2632
 - 12. Access, Secure 2634
 - 13. Plans Submit Date: 2711
 - 14. As Built Date: 2635

Rev 8/88

Contact: THOMAS D. DALZELL

Title: SENIOR SCIENTIST

Signature: _____

Inspector: Juliet Stein

Signature: _____

II, III

Pa 2

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Inspection Form

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

II, III

Site ID # _____ Site Name Broadway Volkswagens Today's Date 08/05/99

Site Address 2740 Broadway

City Oakland Zip 94 Phone _____

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

~~SB~~ The next sample location, SB-2E, was placed adjacent to former boring location SB-3. One soil sample was collected from the soil at ~6.8- to 7.8-foot bgs at the soil/water interface. Soil was dry w/ no odor. Last sample interval could only go down to 11 1/2 feet bgs due to resistance. This interval was from 8- to 11 1/2-foot bgs total. Due to the plastic clay, we could not extrude the soil from the tube. Therefore, they capped the ends of the tube & will take it to Gregg Drilling's yard to obtain a 2-ft brass sampler to extract a soil sample from the tube from 9.5- to 10.5-foot bgs interval. Soil must be kept cool until sample is collected in Martinez, & they iced until brought to lab. Boring notes were generated JMS

II.A BUSINESS PLANS (Title 19)

- 1. Immediate Reporting 2703
- 2. Bus. Plan Stds. 25503(b)
- 3. RR Cars > 30 days 25503.7
- 4. Inventory Information 25504(a)
- 5. Inventory Complete 2730
- 6. Emergency Response 25504(b)
- 7. Training 25504(c)
- 8. Deficiency 25505(a)
- 9. Modification 25505(b)

II.B ACUTELY HAZ. MATLS

- 10. Registration Form Filed 25533(a)
- 11. Form Complete 25533(b)
- 12. RMPP Contents 25534(c)
- 13. Implement Sch. Req'd? (Y/N) _____
- 14. OffSite Conseq. Assess. 25524(c)
- 15. Probable Risk Assessment 25534(d)
- 16. Persons Responsible 25534(g)
- 17. Certification 25534(f)
- 18. Exemption Request? (Y/N) 25536(b)
- 19. Trade Secret Requested? 25538

III. UNDERGROUND TANKS (Title 23)

- | | |
|-------------------------------|---|
| General | <input type="checkbox"/> 1. Permit Application 25284 (H&S) |
| | <input type="checkbox"/> 2. Pipeline Leak Detection 25292 (H&S) |
| | <input type="checkbox"/> 3. Records Maintenance 2712 |
| | <input type="checkbox"/> 4. Release Report 2651 |
| | <input type="checkbox"/> 5. Closure Plans 2670 |
| Monitoring for Existing Tanks | <input type="checkbox"/> 6. Method |
| | 1) Monthly Test |
| | 2) Daily Vadose
Semi-annual groundwater
One time soils |
| | 3) Daily Vadose
One time soils
Annual tank test |
| | 4) Monthly Groundwater
One time soils |
| | 5) Daily Inventory
Annual tank testing
Cont pipe leak det
Vadose/gndwater mon. |
| | 6) Daily Inventory
Annual tank testing
Cont pipe leak det |
| | 7) Weekly Tank Gauge
Annual tank testing |
| | 8) Annual Tank Testing
Daily Inventory |
| | 9) Other _____ |
| New Tanks | <input type="checkbox"/> 7. Precs Tank Test 2643
Date: _____ |
| | <input type="checkbox"/> 8. Inventory Rec. 2644 |
| | <input type="checkbox"/> 9. Soil Testing 2646 |
| | <input type="checkbox"/> 10. Ground Water. 2647 |
| | <input type="checkbox"/> 11. Monitor Plan 2632 |
| | <input type="checkbox"/> 12. Access. Secure 2634 |
| | <input type="checkbox"/> 13. Plans Submit 2711
Date: _____ |
| | <input type="checkbox"/> 14. As Built 2635
Date: _____ |

Rev 6/88

II, III

Contact: Thomas D. Dalzell
 Title: Senior Scientist
 Signature: [Signature]

Inspector: Juliet Shin
 Signature: [Signature]

Pg. 2

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

II, III

Site ID # _____ Site Name Broadway Volkswagen Today's Date 08/05/99

Site Address 2740 Broadway

City Oakland Zip 94 Phone _____

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

• Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

~~SB~~ The next sample location, SB-2E, was placed adjacent to former boring location SB-3. One soil sample was collected from the soil at ~6.8- to 7.0-foot bgs at the soil/water interface. Soil was dry w/ no odor. Last sample interval could only go down to 11 1/2-foot bgs due to resistance. This interval was from 8- to 11 1/2-foot bgs total. Due to the plastic clay, we could not extrude the soil from the tube. Therefore, they capped the ends of the tube & will take it to Gregg Drilling's yard to obtain a 2-ft brass sampler to extract a soil sample from the tube from 9.5- to 10.5-foot bgs interval. Soil must be kept cool until sample is collected in Martinez, & then iced until brought to lab. Boring tubes were grouted.

II.A BUSINESS PLANS (Title 19)

- 1. Immediate Reporting 2703
- 2. Bus. Plan Stds. 25503(b)
- 3. RR Cars > 30 days 25503.7
- 4. Inventory Information 25504(a)
- 5. Inventory Complete 2730
- 6. Emergency Response 25504(b)
- 7. Training 25504(c)
- 8. Deficiency 25505(a)
- 9. Modification 25505(b)

II.B ACUTELY HAZ. MATLS

- 10. Registration Form Filed 25533(a)
- 11. Form Complete 25533(b)
- 12. RMPP Contents 25534(c)
- 13. Implement Sch. Req'd? (Y/N)
- 14. OffSite Conseq. Assess. 25524(c)
- 15. Probable Risk Assessment 25534(d)
- 16. Persons Responsible 25534(g)
- 17. Certification 25534(f)
- 18. Exemption Request? (Y/N) 25536(b)
- 19. Trade Secret Requested? 25538

III. UNDERGROUND TANKS (Title 23)

- | | |
|-------------------------------|--|
| General | <input type="checkbox"/> 1. Permit Application 25284 (H&S) |
| | <input type="checkbox"/> 2. Pipeline Leak Detection 25292 (H&S) |
| | <input type="checkbox"/> 3. Records Maintenance 2712 |
| | <input type="checkbox"/> 4. Release Report 2651 |
| | <input type="checkbox"/> 5. Closure Plans 2670 |
| Monitoring for Existing Tanks | <input type="checkbox"/> 6. Method |
| | 1) Monthly Test |
| | 2) Daily Vadose
Semi-annual groundwater
One time soils |
| | 3) Daily Vadose
One time soils
Annual tank test |
| | 4) Monthly Groundwater
One time soils |
| | 5) Daily inventory
Annual tank testing
Cont pipe leak det
Vadose/groundwater mon. |
| | 6) Daily Inventory
Annual tank testing
Cont pipe leak det |
| | 7) Weekly Tank Gauge
Annual tank testing |
| | 8) Annual Tank Testing
Daily inventory |
| | 9) Other _____ |
| New Tanks | <input type="checkbox"/> 7. Precs Tank Test 2643
Date: _____ |
| | <input type="checkbox"/> 8. Inventory Rec. 2644 |
| | <input type="checkbox"/> 9. Soil Testing 2646 |
| | <input type="checkbox"/> 10. Ground Water. 2647 |
| | <input type="checkbox"/> 11. Monitor Plan 2632 |
| | <input type="checkbox"/> 12. Access. Secure 2634 |
| | <input type="checkbox"/> 13. Plans Submit 2711
Date: _____ |
| | <input type="checkbox"/> 14. As Built 2635
Date: _____ |

Rev 6/88

II, III

Contact: THOMAS D. DALZEL

Title: SENIOR SCIENTIST

Signature: [Signature]

Inspector: Juliet Spin

Signature: [Signature]

Shin, Juliette, Public Health, EH

From: Thomas Dalzell [SMTP:tddalzell@esemail.com]
Sent: Tuesday, July 20, 1999 9:06 AM
To: jshin@co.alameda.ca.us
Cc: thomas.moffatt@vw.com
Subject: Broadway VW

Juliet:

As of today I have the following tentative schedule for the Broadway VW field activities:

Well Redevelopment - Thursday, July 29, 1999

Well Sampling - Tuesday, August 3, 1999

Direct Push Soil Borings - Thursday, August 5, 1999

If you have any questions or comments please contact me in the office at 925-313-0840 or at my new mobile phone 925-766-8756.

TDD

cc: Tom Moffatt

REF./ACCT. # MIT

STID 470

PAYOR # 1183
PROJECT # 76C

STID # 470

COUNTY OF ALAMEDA
OFFICE OF THE AUDITOR-CONTROLLER

MISCELLANEOUS RECEIPT

NO 800489

\$ 1500

DOLLARS

CASH PERSONAL/CASHIER'S CHECK/M. O. # 000210 OTHER:

RECEIVED FROM: Trampwell Inc 3800 - Hamlin Rd Suite #100 Auburn, Mi

FOR: Broadway Wagon 2740 - Broadway Ave. OAK CA 48836

DATE: 4/08/99 RECEIVED BY: DJ Dwyer DEPT NO: 4530

110-1 (Rev 10/83) 0123E (08)

Distribution: White - Payor Yellow & Pink - Depart.

REF./ACCT. # MIT

STID # 470

COUNTY OF ALAMEDA
OFFICE OF THE AUDITOR-CONTROLLER

MISCELLANEOUS RECEIPT

NO 800489

\$ 1500

DOLLARS

CASH PERSONAL/CASHIER'S CHECK/M. O. # 000210 OTHER:

RECEIVED FROM: Trampwell Inc 3800 - Hamlin Rd Suite #100 Auburn, Mi

FOR: Broadway Wagon 2740 - Broadway Ave. OAK CA 48836

DATE: 4/08/99 RECEIVED BY: DJ Dwyer DEPT NO: 4530

110-1 (Rev 10/83) 0123E (08)

Distribution: White - Payor Yellow & Pink - Depart.

575

REF./ ACCT. # MIT

STid # 470

COUNTY OF ALAMEDA
OFFICE OF THE AUDITOR-CONTROLLER
MISCELLANEOUS RECEIPT

No 800489

\$ 1500

DOLLARS

CASH PERSONAL/CASHIER'S CHECK/M. O. # 022210 OTHER: _____

RECEIVED FROM: Trammell Inc 3800 - Hamlin Rd Suite #100 Auburn Hills, MI 48836

FOR: Broadway Highway, 2740 - Broadway Ave, Oak G

DATE: 6/28/99 RECEIVED BY: B. Swee DEPT. NO.: 430-4530

110-1 (Rev 10/83) 0123E (08)

Distribution: White - Payor Yellow & Pink - Depart.

TOTAL

1,500.00 0.00

1,500.00

(FCORE)

Trammell Crow Company

TRAMMELL CROW AUTOMOTIVE REALTY SERVICES, INC.
3800 Hamlin Road, Suite 100
Auburn Hills, MI 48326
Phone: 248 340 5500

Comerica Bank- Ann Arbor, N.A.
Ann Arbor, MI

74-478
724

DATE	CHECK NO.	AMOUNT
06/24/99	022210	\$*****1,500.00*

ONE THOUSAND FIVE HUNDRED AND NO/100 DOLLARS *****

PAY TO THE ORDER OF

Alameda County Environ.
Health Services
1131 Harbor Bay Pkwy #250
Alameda, CA 94502

MR [Signature]
[Signature]

⑈022210⑈ ⑆072404786⑆ 2176961858⑈

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

June 21, 1999

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Road, Ste 100
Auburn Hills, MI 48326

STID: 470

Re: Workplan addressing investigations associated with the former USTs at Broadway Volkswagen, located at 2740 Broadway Ave., Oakland

Dear Mr. Moffatt,

This office has reviewed QST Environmental's June 11, 1999 workplan addressing the required verification monitoring for the above site. This workplan is acceptable to this office with the following conditions:

- Please be reminded to wait a minimum of 72 hours after developing Wells MW-1 and MW-3 before purging and sampling them.
- In addition to the proposed analysis of groundwater samples for benzene, groundwater analysis must also include, TPHg, toluene, ethylbenzene, total xylenes, and MTBE.

The workplan must be implemented within 45 days of the receipt of this letter, (i.e., by ~August 6, 1999). A report documenting the work shall be submitted to this office within 45 days after completing field activities.

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

Sincerely,

Juliet Shin
Hazardous Materials Specialist

Cc: Thomas D. Dalzell
QST Environmental
1340 Arnold Dr., Ste 126
Martinez, CA 94553

Alameda County Environmental Health

1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
Telephone (510) 567-6700 FAX (510) 337-9335

FACSIMILE COVER SHEET

TO: Thomas Datzell, QST, 925 510-313-0844

FROM: Juliet Shin

DATE: 06/21/99

Total number of pages including cover sheet 2

-NOTES- _____

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
671	925 313 0844	06-21 13:25	00' 27	01/01	OK		

7499402045

Alameda County Environmental Health

1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
Telephone (510) 567-6700 FAX (510) 337-9335

FACSIMILE COVER SHEET

TO: Thomas Datzell, QST, 510-313-0844

FROM: Juliet Shin

DATE: 06/21/99

Total number of pages including cover sheet 2

-NOTES-

1999.06-21 13:26
 510 337 9335
 ALAMEDA CO EHS HAZ-OPS

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
572	925 313 0844	06-21 13:26	00' 29	01/01	OK		

7499402046

ALAMEDA COUNTY
 HEALTH CARE SERVICES

AGENCY
 DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

June 21, 1999

Tom Moffatt
 Vorelco, Inc.
 3800 Hamlin Road, Ste 100
 Auburn Hills, MI 48326

STID: 470

Re: Workplan addressing investigations associated with the former USTs at Broadway Volkswagen, located at 2740 Broadway Ave., Oakland

Dear Mr. Moffatt,

This office has reviewed QST Environmental's June 11, 1999 workplan addressing the required verification monitoring for the above site. This workplan is acceptable to this office with the following conditions:

- Please be reminded to wait a minimum of 72 hours after developing Wells MW-1 and MW-3 before purging and sampling them.
- In addition to the proposed analysis of groundwater samples for benzene, groundwater analysis must also include, TPHg, toluene, ethylbenzene, total xylenes, and MTBE.

The workplan must be implemented within 45 days of the receipt of this letter, (i.e., by ~August 6, 1999). A report documenting the work shall be submitted to this office within 45 days after completing field activities.

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

June 15, 1999

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Road, Ste 100
Auburn Hills, MI 48326

STID: 470

Re: Required investigations for the HVOC contamination at the Broadway Volkswagen site,
located at 2740 Broadway Ave., Oakland, CA

Dear Mr. Moffatt,

This office has received your letter, dated May 21, 1999, proposing that the chlorinated hydrocarbon contamination (VOCs) be investigated after the UST-related issues are formally closed. Per Alameda County's and the Regional Water Quality Control Board's (RWQCB) statements at the April 26, 1999 meeting, **you are required to conduct investigations for the VOCs in conjunction with the UST-related investigations.** Per the County's meeting notes, we agreed on April 26, 1999 that a workplan for the VOC contamination would be submitted by June 08, 1999. We also discussed in detail the type of work that would be expected from Vorelco, Inc. to address the VOC contamination, and the County even summarized some of the work in it's April 27, 1999 to your office.

Per the California Water Code Section 13267, you are required to submit a workplan addressing the VOC investigations to this office by July 27, 1999. Additionally, per Section 6.92.040L of the Alameda County Ordinance Code, the County is requiring the submittal of a deposit for \$1,500.00, made payable to Alameda County Environmental Health Services, with the workplan to cover oversight costs. Per the California Water Code Section 13268, any person failing or refusing to furnish the required reports may be pursued for civil liability by the RWQCB, which may result in a fine of up to \$1,000.00 for each day in which the violation occurs.

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

Sincerely,

A handwritten signature in cursive script, appearing to read 'Juliet Shin'.

Juliet Shin
Hazardous Materials Specialist

Cc: Thomas Dalzell
QST Environmental
1340 Arnold Drive, Ste 126
Martinez, CA 94553-4189

RECEIVED
Derek Lee, RWQCB

JUN 21 1999

FRAMMELL CROW
CORPORATE SERVICES

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
548	248 340 5525	06-15 15:41	00' 33	01/01	OK		

7499402045

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Post-It™ brand fax transmittal memo 7671		# of pages > 1
To Tom Moffatt	From Juliet Shin	
Co. Vorelco, Inc.	Co. Alameda City	
Dept.	Phone # 510-567-6763	
Fax # 248-340-5525	Fax # 510-337-9335	

1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94602-6577
(510) 567-6700
(510) 337-9335 (FAX)

June 15, 1999

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Road, Ste 100
Auburn Hills, MI 48326

STID: 470

Re: Required investigations for the HVOC contamination at the Broadway Volkswagen site, located at 2740 Broadway Ave., Oakland, CA

Dear Mr. Moffatt,

This office has received your letter, dated May 21, 1999, proposing that the chlorinated hydrocarbon contamination (VOCs) be investigated after the UST-related issues are formally closed. Per Alameda County's and the Regional Water Quality Control Board's (RWQCB) statements at the April 26, 1999 meeting, you are required to conduct investigations for the VOCs in conjunction with the UST-related investigations. Per the County's meeting notes, we agreed on April 26, 1999 that a workplan for the VOC contamination would be submitted by June 08, 1999. We also discussed in detail the type of work that would be expected from Vorelco, Inc. to address the VOC contamination, and the County even summarized some of the work in it's April 27, 1999 to your office.

Per the California Water Code Section 13267, you are required to submit a workplan addressing the VOC investigations to this office by July 27, 1999. Additionally, per Section 6.92.040L of the Alameda County Ordinance Code, the County is requiring the submittal of a deposit for \$1,500.00, made payable to Alameda County Environmental Health Services, with the workplan to cover oversight costs. Per the California Water Code Section 13268, any person failing or refusing to furnish the required reports may be pursued for civil liability by the RWQCB, which may result in a fine of up to \$1,000.00 for each day in which the violation occurs.

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

Trammell Crow Company

May 21, 1999

Ms. Juliet Shin
Department of Environmental Health
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 94502

Dear Ms. Shin:

As the outcome of our meeting on Monday, April 26, the following are the points of agreement as understood for the preparation of the work plan specified by your office for June 11, 1999:

- The closure issue at hand is the UST location at Broadway Volkswagen, 2740 Broadway Avenue, Oakland, California (STID 470).
- Characterization of halogenated volatile organic chemicals (HVOCs) in the vicinity groundwater as site-related or not is a separate issue. The HVOC issue will be addressed through the SLIC program, which operates on a deposit basis. We are in receipt of your letter of April 27, 1999, that addresses this issue. However, as we did not review this topic in detail at the meeting, I would like to discuss the procedure and timing for opening the SLIC file to address HVOCs in groundwater at this site. My plans are to complete the UST closure, then focus our attention on the HVOC issue. We therefore request an extension for the HVOC workplan submittal until such a time as we have completed the UST closure activities.
- Verification monitoring is the first priority; 2 soil borings will be advanced in the immediate area of former borings SB-2 and SB-3 to confirm or revise the maximum concentrations used in the risk summary for closure.
- The existing groundwater monitoring wells (MW-1 and -3) will be sampled.
- Decision making for UST closure will be based on analytical results for benzene concentrations in soil and/or groundwater. If the analytical results for either medium (soil or groundwater) are not detected, that medium need not be evaluated in the risk summary for closure.
- If a risk summary is required in the closure report, the targets for the RBCA approach will be 10^{-5} increased lifetime cancer risk, for a commercial-industrial exposure scenario incorporating the California cancer slope factor to modify the RBSLs.

99 MAY 25 PM 4:19
ENVIRONMENTAL
PROTECTION

- The gradient will be determined once again for the closure report based on the survey of the wells currently available.

The work plan currently in preparation will incorporate these points of agreement. If you do not agree with any of the above, please advise immediately as this may have significant bearing on the completion of the work plan by the specified date.

Sincerely,
Trammell Crow Automotive Realty Services



Tom Moffatt
Senior Construction Manager

cc: T. Dalzell, R. Scott, L. Froebe (QST); D.C. Lee (RWQCB)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

April 27, 1999

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Road, Ste 100
Auburn Hills, MI 48326

Re: Required investigations for the HVOC contamination at the Broadway Volkswagen site, located at 2740 Broadway Ave., Oakland, CA

Dear Mr. Moffatt,

Per our meeting on April 26, 1999, it was determined that the Halogenated Volatile Organic Compounds (HVOCs) observed in the groundwater beneath the site does not appear to be resulting from the on-site underground storage tanks (UST). However, it is still uncertain whether the HVOC contamination is coming from on site or off site, and further HVOC investigations will be required. Therefore, the petroleum contamination associated with the former USTs will continue to be handled under the Local Oversight Program (LOP), while the HVOC issues will be handled under the SLIC Program. Since Vorelco, Inc. (Vorelco) has chosen to maintain that the HVOC contamination is coming from off site, Vorelco will be responsible for providing sufficient information to support its position, to the satisfaction of this office and the Regional Water Quality Control Board. Per our meeting, the following is a list of some of the discussed information/investigations that may be necessary in determining whether the HVOC contamination is coming from off site or on site: 1) submittal of a detailed history of site uses/operations; 2) sufficient information on other sites in the vicinity that strongly suggests that one or a number of these sites are sources of the HVOC plume; 3) reviewing utility line locations, slopes, backfill materials, etc. to assist in identifying any localized variations in groundwater flow directions and to assist in identifying any potential conduits for contaminant migration; and/or 4) the collection of an upgradient groundwater sample to determine whether the upgradient concentrations are higher and therefore coming from an off-site source.

A workplan addressing this work should be submitted to this office within 45 days of the date of this letter, (i.e., by June 08, 1999). If it is determined through further investigations that the HVOC contamination is coming from off site, than Vorelco will be relieved of all responsibilities associated with the HVOCs. If it cannot be shown that the HVOCs are coming from off site, the site will remain open and Vorelco will be responsible for preparing a Risk Management Plan for the site and conducting on-going groundwater monitoring. The Risk Management Plan may include a human health risk assessment.

As discussed in our meeting, a deposit/refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code for the County's oversight costs for SLIC cases. Please submit a deposit of \$1,500.00 made payable to Alameda County Environmental Health Services within three weeks of the receipt of this letter, (i.e., by May 18, 1999). It is expected that the

values. Appendix X2 describes the basis of these values.

	Exposure Pathway	Receptor Scenario	Target Level	Benzene	Ethylbenzene	Toluene	Xylenes (m-xyl)	Naphthalene	Benz(a)pyrene
				ppm					
AIR	Indoor Air Screening Levels for Inhalation Exposure (µg/m³)	Residential	Cancer Risk = 1E-06	0.11					1.86E-03
			Cancer Risk = 1E-04	11.37					1.86E-01
			Chronic HQ = 1		1.39E+03	5.56E+02	9.73E+03	1.95E+01	
		Commercial/Industrial	Cancer Risk = 1E-06	0.14					2.35E-03
			Cancer Risk = 1E-04	14.3					2.35E-01
			Chronic HQ = 1		1.46E+03	5.84E+02	1.02E+04	2.04E+01	
	Outdoor Air Screening Levels for Inhalation Exposure (µg/m³)	Residential	Cancer Risk = 1E-06	0.09					1.40E-03
			Cancer Risk = 1E-04	8.53					1.40E-01
			Chronic HQ = 1		1.04E+03	4.17E+02	7.30E+03	1.46E+01	
		Commercial/Industrial	Cancer Risk = 1E-06	0.14					2.35E-03
Cancer Risk = 1E-04			14.3					2.35E-01	
Chronic HQ = 1				1.46E+03	5.84E+02	1.02E+04	2.04E+01		
OSHA TWA PEL (µg/m³)				3.20E+03	4.35E+05	7.53E+05	4.35E+05	5.00E+04	2.00E+02 (L)
Mean Odor Detection Threshold (µg/m³) [2]				1.95E+05		6.00E+03	8.70E+04	2.00E+02	
National Indoor Background Concentration Range (µg/m³) [3]				3.25E+00 - 2.15E+01	2.20E+00 - 9.70E+00	9.60E-01 - 2.91E+01	4.85E+00 - 4.76E+01		
SOIL	Soil - Volatilization to Outdoor Air (mg/kg)	Residential	Cancer Risk = 1E-06	0.08					RES
			Cancer Risk = 1E-04	7.89					RES
			Chronic HQ = 1		RES	RES	RES	RES	
		Commercial/Industrial	Cancer Risk = 1E-06	0.13					RES
			Cancer Risk = 1E-04	13.25					RES
			Chronic HQ = 1		RES	RES	RES	RES	
	Soil - Vapor Intrusion from Soil to Buildings (mg/kg)	Residential	Cancer Risk = 1E-06	0.002					RES
			Cancer Risk = 1E-04	0.16					RES
			Chronic HQ = 1		3.46E+01	2.08E+01	RES	4.07E+01	
		Commercial/Industrial	Cancer Risk = 1E-06	0.003					RES
			Cancer Risk = 1E-04	0.4903					RES
			Chronic HQ = 1		9.08E+01	5.45E+01	RES	1.07E+02	
	Surface Soil (0-3 ft) Ingestion/Dermal/Inhalation (mg/kg)	Residential	Cancer Risk = 1E-06	1.69					1.30E-01
			Cancer Risk = 1E-04	168.8					1.30E+01
			Chronic HQ = 1		7.83E+03	1.33E+04	1.45E+05	9.77E+02	
		Commercial/Industrial	Cancer Risk = 1E-06	2.9					3.04E-01
			Cancer Risk = 1E-04	290					3.04E+01
			Chronic HQ = 1		1.15E+04	1.87E+04	2.08E+05	1.50E+03	
Soil - Leachate to Protect Groundwater Ingestion Target Level (mg/kg)	Residential	MCL's	2.93E-02					9.42E+00	
		Cancer Risk = 1E-06	0.005					5.50E-01	
		Cancer Risk = 1E-04	0.5					RES	
	Commercial/Industrial	Chronic HQ = 1		4.75E+01	1.29E+02	RES	2.29E+01		
		Cancer Risk = 1E-06	0.017					1.85E+00	
		Cancer Risk = 1E-04	1.68					RES	
GROUND WATER	Groundwater - Volatilization to Outdoor Air (mg/L)	Residential	Cancer Risk = 1E-06	3.19					> S
			Cancer Risk = 1E-04	319					> S
			Chronic HQ = 1		> S	> S	> S	> S	
		Commercial/Industrial	Cancer Risk = 1E-06	5.34					> S
			Cancer Risk = 1E-04	> S					> S
			Chronic HQ = 1		> S	> S	> S	> S	
	Groundwater Ingestion (mg/L)	Residential	MCL's	500E-03					2.00E-04
			Cancer Risk = 1E-06	0.0009					1.17E-05
			Cancer Risk = 1E-04	0.085					1.17E-03
		Commercial/Industrial	Chronic HQ = 1		3.65E+00	7.30E+00	7.30E+01	1.46E-01	
			Cancer Risk = 1E-06	0.003					3.92E-05
			Cancer Risk = 1E-04	0.29					> S
	Groundwater - Vapor Intrusion from Groundwater to Buildings (mg/L)	Residential	Cancer Risk = 1E-06	0.024					> S
			Cancer Risk = 1E-04	2.35					> S
			Chronic HQ = 1		> S	1.14E+02	> S	1.06E+01	
		Commercial/Industrial	Cancer Risk = 1E-06	0.074					> S
			Cancer Risk = 1E-04	7.424					> S
			Chronic HQ = 1		> S	3.00E+02	> S	2.78E+01	

^A As benzene soluble coal tar pitch volatiles.
^B American Industrial Hygiene Association, *Odor Thresholds for Chemicals with Established Occupational Health Standards*, 1989.
^C From: Shah and Singh, *Environmental Science Technology*, Vol. 20, No. 10, 1986, 1000.

Core Resources/Broadway Volkswagen
 Property 4826 (STID 470)
 2740 Broadway Avenue
 Oakland, California

April 26, 1999
 QST Project No. 5595214

CORRESPONDENCE SUMMARY

DATE	FROM	TO	DOCUMENT	COMMENTS
January 1989 February 3, 1989	ES Inc.	Alameda County	Tank removal report	No HVOCs detected in soil samples collected from the three excavations. Peacock witnessed sampling.
February 10, 1989	Hunter/Gregg	Alameda County	Well installation report	Install Wells MW-1, MW-2 and MW-3. Direction of flow northwestward over two monitoring events.
March 14, 1989	Hunter/Gregg	Alameda County	Letter confirming flow direction	Third round of monitoring flow confirmed northwestward level details
July 25, 1990	Alameda County	CORE	Letter response to 2/10/89 report	Request copies of all previous work.
September 10, 1990	ESE	Alameda County	Letter	Name Change to ESE.
October 22, 1990	Alameda County	CORE	Letter response to 1/89 report	Implement quarterly monitoring for TPH, BTEX and metals.
November 14, 1990	ESE	CORE	Site Assessment Proposal	3-phased approach
December 10, 1990	Alameda County	CORE	Letter response to work plan 11/14/90	Request additional work plan
February 7, 1991	Hunter/Gregg	Alameda County	Letter response to item * 12/10/90 letter	extension request recently hired
March 14, 1991	ESE	Alameda County	Letter response to item * 12/10/90 letter	second extension request due to acquisition of previous report from ES
March 27, 1991	ESE	Alameda County	Work plan	Propose one new well and borings
May 6, 1991	Alameda County	CORE	Letter Response to Work Plan	Approved proposal but required additional work to include HVOCs

DATE	FROM	TO	DOCUMENT	COMMENTS
July 10, 1991	ESE	Alameda County	Well Installation Report	Install MW-4 and drill SB-1, 2a, 2b, 3, and 4. Found MW-2 destroyed. No HVOCs in soil samples.
August 1, 1991	Alameda County	CORE	Letter Response to 7/10/91 report	Approved recommendations and requested a detailed work plan
August 20, 1991	ESE	Alameda County	Work Plan Response to 8/1/91 letter	Propose two wells
November 22, 1991	ESE	Alameda County	Well installation report (dated 11/12/91)	Install MW-5 and MW-6
January 27, 1992	ESE	Alameda County	Letter Summary of Previous Soil Sampling	Request meeting that no further action related to HVOCs be required
October 1, 1992	Alameda County	CORE	Letter response to 4 th quarter report	Recommendations are acceptable except quarterly monitoring results should be submitted.
October 20, 1992	CORE	Alameda County	Response to 10/1/92 letter	Must resolve issue regarding off-site source of HVOCs.
December 3, 1992	ESE	Alameda County	Groundwater Sampling Report	Significantly high concentration of TCE off site. Flow is generally west-northwest with a radial northeast component.
December 7, 1992	Alameda County	CORE	Meeting	
December 10, 1992	Alameda County	CORE	Meeting summary	Agrees TCE appears to be from off site and will investigate potential sources. ESE will prepare proposal to abandon wells.

DATE	FROM	TO	DOCUMENT	COMMENTS
April 12, 1993	Alameda County	CORE	Review of 12/3/92 quarter report	Finds recommendations acceptable on conditions: 1)consider site across street using TCE, 2)additional assessment required after closing 3 wells, 3)submit quarterly reports, 4)City Sewer line shown incorrectly, 5)feasibility study.
May 27, 1993	CORE	Alameda County	Reply to 4/12 County letter	Organizing quarterly sampling plan.
August 3, 1993 September 3, 1993	ESE	Alameda County	Groundwater Sampling Report	TCE still high in MW-6. Flow is west-northwest.
September 23, 1993	Alameda County	CORE	Review of 8/3/93 report	Recommendations are acceptable but install downgradient well to the west. Continue quarterly monitoring and using risk based cleanup goals is possible.
April 26, 1994	ESE	Alameda County	Well installation and abandonment report	Abandon Wells MW-4, MW-5 and MW-6. Install VW-1, VW-2 , VW-3 and MW-7. Recommend sampling for TPH/BTEX only. No samples.
May 31, 1994	Alameda County	CORE	Review of 4/94 report	Requires additional downgradient well and TPH and BTEX analysis. Notes cleanup not required if analytes are from off-site.
August 1, 1994	ESE	Alameda County	Work plan	For vapor extraction test
September 20 1994	Alameda County	ESE	Work plan approval	Approves VET Requires analysis for TPH, BTEX and HVOCs
January 27, 1995	ESE	Alameda County	Vapor extraction test report	Water influx noted except in backfill
March 14, 1995	Alameda County	CORE	Review of VET report	Technology is feasible at the site.

DATE	FROM	TO	DOCUMENT	COMMENTS
August 25, 1995	ESE	Alameda County	Remedial Action Plan	Outlines sampling requirements for BTEX and TPH only.
September 29, 1995	Alameda County	CORE	RAP Approval	Does not require testing for HVOCs or specify that this is an interim corrective action plan.
October 30, 1996	ESE	Alameda County	Groundwater and system monitoring report	No gradient determined; only two wells surveyed. ND, except MW-3.
January 1997	ESE	Alameda County	Quarterly Report	
August 29 1997	Alameda County	CORE	Response to 1/97 report	Specify testing for MTBE next time and point out that site may be eligible for closure.
November 18, 1997	QST	Alameda County	Groundwater and system monitoring report	No gradient determined only two wells surveyed. ND except MW-3.
December 10, 1997	Alameda County	CORE	Case Closure Requirements	Recommend risk evaluation and require at least one additional round of sampling to include HVOCs.
January 9, 1998	Alameda County	CORE	Closure Discussion	Mentions may wish to perform evaluation with current data. If additional sampling, then analyze for HVOCs. Attempts to explain previous actions by other County representatives.
March 1, 1999	QST	Alameda County	Closure Report	Includes Risk Summary
March 15, 1999	Alameda County	CORE	Closure Report Review	Mentions TCE, benzene, risk assessment guidelines, surveying, well destruction, etc.
April 15 1999	QST	Alameda County	Response to 3/15/99 letter	Agreement for work plan submittal.

Core Resources/Broadway Volkswagen
 Property 4826 (STID 470)
 2740 Broadway Avenue
 Oakland, California

April 26, 1999
 QST Project No. 8595214

CORRESPONDENCE SUMMARY

DATE	FROM	TO	DOCUMENT	COMMENTS
January 1989 February 3, 1989	ES Inc.	Alameda County	Tank removal report	No HVOCs detected in soil samples collected from the three excavations. Peacock witnessed sampling.
February 10, 1989	Hunter/Gregg	Alameda County	Well installation report	Install Wells MW-1, MW-2 and MW-3. Direction of flow northwestward over two monitoring events.
March 14, 1989	Hunter/Gregg	Alameda County	Letter confirming flow direction	Third round of monitoring flow confirmed northwestward level details
July 25, 1990	Alameda County	CORE	Letter response to 2/10/89 report	Request copies of all previous work.
September 10, 1990	ESE	Alameda County	Letter	Name Change to ESE.
October 22, 1990	Alameda County	CORE	Letter response to 1/89 report	Implement quarterly monitoring for TPH, BTEX and metals.
November 14, 1990	ESE	CORE	Site Assessment Proposal	3-phased approach
December 10, 1990	Alameda County	CORE	Letter response to work plan 11/14/90	Request additional work plan
February 7, 1991	Hunter/Gregg	Alameda County	Letter response to item * 12/10/90 letter	extension request recently hired
March 14, 1991	ESE	Alameda County	Letter response to item * 12/10/90 letter	second extension request due to acquisition of previous report from ES
March 27, 1991	ESE	Alameda County	Work plan	Propose one new well and borings
May 6, 1991	Alameda County	CORE	Letter Response to Work Plan	Approved proposal but required additional work to include HVOCs

DATE	FROM	TO	DOCUMENT	COMMENTS
July 10, 1991	ESE	Alameda County	Well Installation Report	Install MW-4 and drill SB-1, 2a, 2b, 3, and 4. Found MW-2 destroyed. No HVOCs in soil samples.
August 1, 1991	Alameda County	CORE	Letter Response to 7/10/91 report	Approved recommendations and requested a detailed work plan
August 20, 1991	ESE	Alameda County	Work Plan Response to 8/1/91 letter	Propose two wells
November 22, 1991	ESE	Alameda County	Well installation report (dated 11/12/91)	Install MW-5 and MW-6
January 27, 1992	ESE	Alameda County	Letter Summary of Previous Soil Sampling	Request meeting that no further action related to HVOCs be required
October 1, 1992	Alameda County	CORE	Letter response to 4 th quarter report	Recommendations are acceptable except quarterly monitoring results should be submitted.
October 20, 1992	CORE	Alameda County	Response to 10/1/92 letter	Must resolve issue regarding off-site source of HVOCs.
December 3, 1992	ESE	Alameda County	Groundwater Sampling Report	Significantly high concentration of TCE off site. Flow is generally west-northwest with a radial northeast component.
December 7, 1992	Alameda County	CORE	Meeting	
December 10, 1992	Alameda County	CORE	Meeting summary	Agrees TCE appears to be from off site and will investigate potential sources. ESE will prepare proposal to abandon wells.

DATE	FROM	TO	DOCUMENT	COMMENTS
April 12, 1993	Alameda County	CORE	Review of 12/3/92 quarter report	Finds recommendations acceptable on conditions: 1)consider site across street using TCE, 2)additional assessment required after closing 3 wells, 3)submit quarterly reports, 4)City Sewer line shown incorrectly, 5)feasibility study.
May 27, 1993	CORE	Alameda County	Reply to 4/12 County letter	Organizing quarterly sampling plan.
August 3, 1993 September 3, 1993	ESE	Alameda County	Groundwater Sampling Report	TCE still high in MW-6. Flow is west-northwest.
September 23, 1993	Alameda County	CORE	Review of 8/3/93 report	Recommendations are acceptable but install downgradient well to the west. Continue quarterly monitoring and using risk based cleanup goals is possible.
April 26, 1994	ESE	Alameda County	Well installation and abandonment report	Abandon Wells MW-4, MW-5 and MW-6. Install VW-1, VW-2 , VW-3 and MW-7. Recommend sampling for TPH/BTEX only. No samples.
May 31, 1994	Alameda County	CORE	Review of 4/94 report	Requires additional downgradient well and TPH and BTEX analysis. Notes cleanup not required if analytes are from off-site.
August 1, 1994	ESE	Alameda County	Work plan	For vapor extraction test
September 20 1994	Alameda County	ESE	Work plan approval	Approves VET Requires analysis for TPH, BTEX and HVOCs
January 27, 1995	ESE	Alameda County	Vapor extraction test report	Water influx noted except in backfill
March 14, 1995	Alameda County	CORE	Review of VET report	Technology is feasible at the site.

DATE	FROM	TO	DOCUMENT	COMMENTS
August 25, 1995	ESE	Alameda County	Remedial Action Plan	Outlines sampling requirements for BTEX and TPH only.
September 29, 1995	Alameda County	CORE	RAP Approval	Does not require testing for HVOCs or specify that this is an interim corrective action plan.
October 30, 1996	ESE	Alameda County	Groundwater and system monitoring report	No gradient determined; only two wells surveyed. ND, except MW-3.
January 1997	ESE	Alameda County	Quarterly Report	
August 29 1997	Alameda County	CORE	Response to 1/97 report	Specify testing for MTBE next time and point out that site may be eligible for closure.
November 18, 1997	QST	Alameda County	Groundwater and system monitoring report	No gradient determined only two wells surveyed. ND except MW-3.
December 10, 1997	Alameda County	CORE	Case Closure Requirements	Recommend risk evaluation and require at least one additional round of sampling to include HVOCs.
January 9, 1998	Alameda County	CORE	Closure Discussion	Mentions may wish to perform evaluation with current data. If additional sampling, then analyze for HVOCs. Attempts to explain previous actions by other County representatives.
March 1, 1999	QST	Alameda County	Closure Report	Includes Risk Summary
March 15, 1999	Alameda County	CORE	Closure Report Review	Mentions TCE, benzene, risk assessment guidelines, surveying, well destruction, etc.
April 15 1999	QST	Alameda County	Response to 3/15/99 letter	Agreement for work plan submittal.

**QST ENVIRONMENTAL
FACSIMILE TRANSMITTAL
APRIL 23, 1999**

ATTENTION:

Juliet Shin

Alameda County Health Care Services Agency
Environmental Health Services Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

SUBJECT SITE:

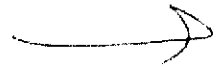
Broadway Volkswagen
2740 Broadway Avenue
Oakland, California (STID 470)

PURPOSE OF APRIL 26, 1999 MEETING:

The purpose of this meeting is to outline the scope of remaining work and agree upon an acceptable plan for final closure of this site.

PROPOSED AGENDA:

1. Confirmation Soil Sampling Plan
2. Groundwater Sampling Plan
3. Discuss criteria for evaluating confirmation samples for closure (ASTM RBCA standards)
4. Well abandonment documentation
5. Commitment to closure



Meeting

04/26/99

In Attendance:

→ Rose Scott, R.G.
w/ QST

Trammell Crow Company

Tom Moffatt
Senior Construction Manager

Trammell Crow Corporate Services
Trammell Crow Automotive Realty Services, Inc.
3800 Hamlin Road, Suite 100 Auburn Hills, Michigan 48326-2829
248-340-5500 (Main) 248-340-5503 (Direct)
248-340-5525 (Fax) 248-613-1453 (Mobile)



Formerly Environmental Science & Engineering, Inc.

925•313•0840
FAX 925•313•0844
CEL 925•518•0607
E-MAIL tddalzell@qstmail.com

Thomas D. Dalzell
Office Manager / Senior Scientist

1340 Arnold Dr., Ste. 126, Martinez, CA 94553-4189

A CILCORP COMPANY



Formerly Environmental Science & Engineering, Inc.

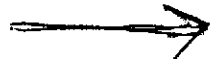
714•426•9000
FAX 714•426•9027
E-MAIL lrfroebe@qstmail.com
Web Site www.qstenvironmental.com

Larry R. Froebe, Ph. D.
Manager Risk Assessment & Toxicology
Health & Safety Coordinator

3545 Howard Way, 2nd Floor, Costa Mesa, CA 92626-1418

A CILCORP COMPANY

Also present, Derek Lee RW@CB
Juliet Shin, Alameda County



- Decided to separate site into "SLIC" and "LOR".
The HVOCs will be handled as "SLIC".

- Requested detailed site history of operations, along w/ detailed literature reviews for sites in immediate area of site, as well as a possible upgradient well to confirm whether HVOCs are coming from onsite or offsite. From there, if it is determined that HVOCs are coming from the site, ~~and~~ an ongoing Risk Mgmt. Plan which will include annual g.w. monitoring and possibly a complete risk assessment for the HVOCs will be required. Also should include detailed info on utility line depths, slopes, backfill travel, material, etc.

- Rosa Scott, AST, will send documentation for the destruction of Well MW-2.

- The workplan for the verification monitoring will be submitted by June 11 '99. The workplan will be submitted w/ a letter summarizing decisions made at today's mtg.

- Although QST April 22, 1999 response letter states that they followed the ASTM guidance documents in completing the risk evaluation summary, which is presumably the one given in the March 1, 1999 Summary Report, there is no mention of or references to the ASTM RBCA guidelines in this risk summary.
- This office is aware that the Preliminary Remedial Goals developed by the Region 9 EPA is based on risk assessment numbers, however, the PRGs do not break down the various pathways, such as soil vapor inhalation into indoor buildings, the way that ASTM RBCA does. The Tier 1 table is a listing of conservative values, that take into consideration more conservation parameters than are generally found at Alameda County sites. Therefore, this office and RWQCB use the Tier 1 table as a gauge to determine whether any threat to human health is likely at various sites. If there is any concern that the residual soil and groundwater concentrations may pose a risk to sensitive receptors, than a Tier 2 risk calculation is generally conducted taking more site-specific parameters into consideration. This is generally how most of the risk assessments are conducted at this time. Other risk assessment calculations are acceptable, but just as QST stated they could not just use Tier 1 table in ASTM RBCA, they cannot use PRGs or MCLs without further calculations.
- Although QST argues that the VOC contamination cannot be coming from the site because no VOC contamination was identified in the soil sample from below the tanks, this alone cannot always be used to prove that the site is not a source of VOCs. For example, we have a site, located at 2560 Webster St., Oakland, where VOC contamination was identified in the groundwater and proven to be coming from on site. However, the soil samples collected from below the tank only identified 0.006ppm PCE and 0.016ppm chlorobenzene, whereas the groundwater samples collected on the same day from below the tank identified 87ppb TCE, 3.7ppb PCE, and DCA and DCE constituents. In the case of the Broadway Motors site, the soil samples collected from below Tank D may have been analyzed using a high detection limit to detect any residual soil concentrations of VOCs that may have been present. The detection limits used for Tank D VOC analysis was 0.2ppm, which is three orders of magnitude higher than the concentrations identified at the Webster site in soil samples.

At this point in time, based on the lack of information provided to confirm groundwater flow directions and the fact that the highest VOC concentrations were initially identified on site, it appears that further work must be conducted to at least show that the VOCs are not coming from on site. QST states that there are no records indicating that VOCs were used on the property, yet when Tank D was discovered, it was labeled an unknown tank because there was no documentation showing what this tank was used for.

- Although QST makes reference to the fact that the site is paved, they should be aware that risk assessments are still conducted in these situations taking into account that pavement can have cracks, etc. Pavement has never been suggested to be impermeable, and that is why most risk assessments have what we call a "crack factor" for buildings.
- Due to the fact that no samples have been collected subsequent to turning off the vapor extraction system, this office needs to determine whether contaminant concentrations may have built up again through time and leaching. If one is to look at extraction system remediation curves for various sites, one will see that the curve rapidly attenuates and

reaches a low. When the system is turned off, one has typically seen the curve rise and level off. Therefore, this office needs to know what the leveled off concentrations, without on-going extraction, are.

- Although QST states that they will compare soil values with the soil vapor to outdoor air values listed in Tier 1 Table of ASTM RBCA, the soil vapor to indoor air pathway also needs to be assessed due to the fact that these tanks were located immediately adjacent to the on-site buildings.
- Although QST has accused the County of undertaking a "fishing expedition" because we asked for information on utility lines, the County must argue that this information is regularly requested, and has been for the last several years, in the proper assessment of a site. Currently, this office needs information on nearby utility lines which may be assisting in skewing normal plume flow extrapolations.
- I would like to clarify that the County asks that all sites survey their wells to Mean Sea Level to provide consistency and therefore accuracy for our office when assessing regional conditions. Please check to make sure that all the wells were properly surveyed to the same benchmark, so that they are consistent with one another in determining groundwater flow directions.
- In discussing ground settlement, the County was suggesting that if MW-3 for instance settled through time, and was still assumed to be 30 feet in elevation, yet the other wells did not, groundwater gradients could be inaccurate.

ENVIRONMENTAL
PROTECTION

99 APR 22 AM 11:41



April 22, 1999

Juliet Shin, Hazardous Materials Specialist
Alameda County Health Care Services Agency
Environmental Health Services Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Subject: Alameda County Response Letter dated March 15, 1999 to the Closure Report for the Broadway Volkswagen site located at 2740 Broadway Avenue in Oakland, California (STID 470); QST Project No. 6595214

Dear Ms. Shin:

At the request of Core Resource, Inc./Trammel Crow (CORE), QST Environmental Inc., (QST) has prepared this response to the subject letter which presented a list of comments regarding the closure report and a summary of additional information requested by your agency. QST would like an opportunity to meet with you regarding these issues at your convenience. To prepare for this meeting, each item presented in your letter is copied and briefly addressed below.

1. The discussion on risk assessments in the closure report compares concentrations of the gas constituents (TPHg and BTEX) to California's Maximum Contaminant Levels (MCLs) and the U.S. Environmental Protection Agency's Preliminary Remedial Goals (PRGs), however, application of the more conservative values given in the ASTM RBCA guidelines (E 1739-95) (ASTM RBCA) are required to assess human health risk. The San Francisco Bay - Regional Water Quality Control Board RWQCB has recommended the use of these guidelines for risk assessment purposes.

QST followed the ASTM guidance document referenced above in preparing the risk summary. The ASTM guidelines present values as *example* screening levels. The table identifying these values clearly states, "This table is presented here only as an **example** set of Tier 1 RBSLs [risk-based screening levels]. It is **not** a list of proposed standards." The ASTM guidance document presents steps for completing a reliable evaluation of risk that were followed in completing the risk evaluation summary prepared by QST. The EPA Region 9 PRGs (1998) are established RBSLs currently in wide use within the environmental industry and presented and supported by the EPA for the purpose of streamlining and standardizing risk-based environmental decision making.

2. Additionally, if it cannot be confirmed that the VOC concentrations of TCE and DCA are coming from off site, a proper human health risk assessment will be required to address the VOC concentrations.

It is QST's opinion that the presence of these VOCs in groundwater is **not** caused by Broadway Volkswagen activities. The strongest support for this opinion comes from the fact that VOCs were **never** identified in soil samples collected at the site. These samples were collected directly beneath the tanks and from selected borings and wells drilled at the site and did **not** contain detectable concentrations of these VOCs. Based on these results, QST concludes that detected VOCs are not derived from an on-site source, and therefore, confirms that these VOCs must be coming from an off-site source.

Previous correspondence and work conducted at the site have indicated that the VOCs do not originate from an on-site source. Although groundwater gradient was used to demonstrate that the source was off site, additional evidence supports this position. The soil samples collected directly beneath the tanks and from selected borings and wells drilled at the site did not contain detectable concentrations of these VOCs. Furthermore, no records have been obtained indicating the use of these chemicals on the property. Therefore, QST concludes that the source of these VOCs is not on site. QST will prepare a table for our meeting to summarize prior correspondence with your agency related to this issue. There is no record of a request to positively identify the actual source of the VOCs in this correspondence as a condition of closure, nor was there a request to address this issue upon acceptance of the Remedial Action Plan by your agency. Having confirmed that VOCs are not in soil at the site and must therefore be from an off-site source, the burden of discovery of the true source of these VOCs does not fall upon Broadway Volkswagen.

3. Having reviewed our files, the highest concentrations of benzene in soil have been identified in Sample B-D2 at 2.2 ppm from 7 feet below ground surface (bgs) . . . These benzene concentrations in soil exceed ASTM RBCA's Tier 1 table threshold values for the "soil vapor intrusion into outdoor air" pathway (1.3 ppm) and the "soil vapor intrusion into indoor air" pathway (0.003 ppm) for a commercial site at 10^{-5} risk.

Please refer to item 1 addressed above regarding the intent of the ASTM table. Furthermore, these concentrations (prior to remediation) were located in soil below the concrete paved sidewalk along 28th Street and not at a location that may possibly support a structure in the future.

4. The closure report states that the vapor extraction system probably mitigated the benzene concentrations formerly observed in the on-site soils. However, verification monitoring is required to confirm the success of this corrective action, per Article 11, Title 23 California Code of Regulations.

The monitoring performed at this site consisted of sampling influent and effluent vapor and water samples from the remediation system. This method of monitoring has been found acceptable by various local and regional agencies in California for verification monitoring of remediation success at other sites managed by QST. Therefore, the original closure activities at this facility were conducted in compliance with Article 11.

5. Therefore, soil samples shall be collected from areas of the site formerly identifying contaminant concentrations of concern. Additionally mitigation of groundwater contaminants shall be confirmed as well with the sampling of on-site Wells MW-1 and MW-3. Samples shall be analyzed for TPHg and BTEX.

A work plan will be prepared to drill two soil borings in the locations of Soil Samples B-D2, B-D1, and B-C1 and Boring SB-4.

6. If concentrations of benzene in the soils are non detect or below ASTM RBCA's Tier 1 table threshold values, then no risk assessment addressing these gas constituents will be required.

QST will compare the detected concentrations to the outdoor air threshold values on this table.

7. Additionally, mitigation of groundwater contaminants shall be confirmed as well with the sampling of on-site wells MW-1 and MW-3.

The work plan will include procedures for sampling groundwater from these wells in addition to the remaining wells.

8. Samples shall be analyzed for TPHg and BTEX. If concentrations of benzene in the soils are non detect or below ASTM RBCA's Tier 1 table threshold values, then no risk assessment addressing these gas constituents will be required.

The work plan will account for the implementation of these procedures.

9. This office is also requesting an explanation be provided as to why contaminant concentrations of TPHg and BTEX were so much higher in the influent samples collected from the groundwater extraction system on August 19, 1997, as compared to the significantly lower concentrations in the on-site wells that had persisted for at least several prior quarterly sampling events.

As an explanation, QST has provided the following details. First, the extraction system is not connected to the wells that are sampled in the monitoring program, but to the vapor extraction wells. This alone could account for the discrepancy. Because the concentrations are not monitored at each well, the influent concentration observed may be biased from higher extraction from one well or another at different sampling events. Also, based on the summary of totalizer readings for the groundwater system, it appears that the amount of moisture entrained in the vacuum system was minimal during the period from April through July 1997 (i.e. the totalizer reading remained the same). However, by August 19th approximately 85 gallons had been removed. It is possible that the spike in influent concentrations was due to a response to the initial pulse of increased

extraction close to that time rather than an indication of trends in the condition of groundwater at that time as represented by the quarterly groundwater sampling results.

10. Although QST argues that the VOC concentrations on site are coming from off site, the information in our files cannot yet substantiate that claim.

QST has argued that the VOCs are coming from an off-site source because no source has been identified in soil on site. Strong support for this opinion comes from the fact that VOCs were **never** identified in soil samples collected directly beneath the tanks or from selected borings and wells drilled at the site. Based on these results, QST concluded that detected VOCs are not derived from an on-site source, and therefore, indicated that these VOCs must be derived from an off-site source.

11. Equipotential maps have consistently shown since 1991, that groundwater flows towards the north/northeast in the direction of former off-site Well MW-6, which contained the highest concentrations of TCE.

QST would like to re-emphasize that TCE was **never** detected in soil samples collected at the site. In addressing the issue of equipotential maps, QST would be able to demonstrate that groundwater has not consistently flowed this is not the case at the meeting. For instance, in 1993, the direction of groundwater flow was primarily westward (figure attached).

12. Additionally, an isoconcentration map for TCE from October 18, 1991, indicates that the highest TCE concentrations were on site. This would seem to indicate that the concentrations from on site may have migrated to off-site Well MW-6.

Please refer to item 2 above regarding the absence of TCE in soil at the site, which is the greatest evidence that the source is **not** on this site. The fact that TCE has never been detected in soil is strong and undeniable support for an off-site source, whereas one isoconcentration map does not provide enough evidence to support your conclusion that a plume was once on site and is now migrating off site. Using changes in isoconcentrations over time, QST would like to demonstrate at our meeting that there are other simple logical interpretations of the changes in concentrations at Well MW-6.

13. There has only been one instance, in May 1991, where the groundwater was shown to be flowing to the south. In this case, the groundwater flow direction was determined by only using on-site wells MW-1, MW-3, and MW-4.

These were the only wells in existence at that time and typically three points are sufficient to determine a planar surface in space. Furthermore, QST has never argued that Well MW-6 has been consistently due upgradient of the site. The location of this well relative to the local gradient monitored at this site should not be the greatest concern in understanding the source of the TCE in

groundwater. In addition, because of the proximity of the site to the tidally influenced Lake Merritt, the gradient is expected to fluctuate.

14. Further investigations need to be conducted to confirm the groundwater gradient, so that this office may be able to accurately compare upgradient concentrations to downgradient concentrations to confirm that the VOCs are, in fact, coming from off site.

QST will provide contour maps for the previous monitoring periods and address conducting additional measurement of groundwater in the work plan mentioned in item 6 above. However, it is QST's position that Well MW-6 need not be directly upgradient of this site to the be downgradient of an off-site source. The position of Well MW-6 relative to the flow system described at the site using the existing array of wells should not be the only factor under consideration in determining the potential of an off-site source. Furthermore, it is not the responsibility of Broadway Volkswagen to obtain gradient information for the entire surrounding area to understand the true nature of the hydraulic system in effect that could potentially influence migration of chemicals that have **not** been observed in soil at the site.

15. Additionally, a detailed investigation shall be conducted to locate any utility lines that may be influencing groundwater flow directions, acting as a conduit for VOC contaminant transport, or providing a conduit for dumping of contaminants.

QST will provide available public documents regarding underground utilities from the public works department with the work plan. However, this request for additional information, not previously required in the acceptance of the remedial action plan or well abandonment proposal, appears to indicate a fishing expedition and does not appear to be warranted based on the site data.

16. According to the file searches that were conducted by your consultants in 1991, eight sites in the vicinity of your site were identified as possible sources of the VOC contamination. However, insufficient information has been provided to prove that any of these eight sites are truly the source of the VOC contamination, and none of these sites are typical or definitive sources of VOCs, such as in the case of a dry cleaner.

Broadway Volkswagen is itself not a definitive source of VOCs, such as in the case of a dry cleaner. Moreover, based on the results of the soil characterization, QST has not observed any indication of an on-site source. Using soil sample analytical results and trends in groundwater results over time, QST has concluded that the source is off site.

17. It is unclear as to whether the wells were ever surveyed to mean sea level from an established benchmark, or whether these wells were only to an arbitrary benchmark.

The wells were likely surveyed to an assumed elevation of 30.00 feet at Well MW-3 based on the topographic map of the area.

18. As part of future investigations, all wells used to determine groundwater flow directions must be surveyed to mean sea level, to assure an accurate gradient determination.

Surveying wells to an established benchmark would assure accurate elevations of groundwater, but would have **no** impact on the gradient determination. To conclude that an established benchmark is necessary for accurate gradient determinations is absurd. The hydraulic gradient is unitless. The gradient represents the maximum slope and direction of maximum slope of a surface in space. The actual elevation of the surface (planar for three points) has no bearing on its slope or direction of maximum slope, but only its vertical position in space. Examples may be provided if necessary.

19. Due to ground settlement, an arbitrary benchmark may not prove to be effective in attaining accurate groundwater depths and gradient determinations.

First, there are no basic engineering principles to support your comments or concerns. A survey to an established benchmark would have no impact on conditions caused by "ground settlement". Furthermore, the elevation of the top of the well casing does not affect accurate depth determination. Accurate groundwater depths are obtained by measuring the depth to water carefully in the field from the top of the casing, which is considered to be a set fixed point in space. The depth measured is independent of the elevation known or assumed at the top of the casing. Also, the gradient is unrelated to the magnitude of the groundwater elevation. The determined plane in space appears the same at any level. The gradient determination would not change if the wells were surveyed to an established benchmark as opposed to an assumed benchmark as both determine elevations based on a level line of sight established from some fixed point whether known or assumed.

20. Your consultants have argued that the groundwater at the site is "perched", and that . . .

After reviewing the files, current QST project personnel agree with your assessment. QST personnel previously involved with this project were not available to present a justification or explanation of that former position.

21. According to ESE's report dated July 10, 1991, Well MW-2 was found abandoned and improperly destroyed. Was this well ever properly destroyed. If so, you are required to submit the well destruction permit for this well to our office.

Because this well does not appear to have been abandoned properly, QST will obtain a permit for abandoning this well, submit a work plan to locate and abandon this well and forward the permit to you with an abandonment report after closure is received and all of the wells at the site can be abandoned together.

22. Additionally, please submit copies of the well destruction permit for Wells MW-4, MW-5, and MW-6.

April 22, 1999
J. Shin/Alameda County
page 7

QST will obtain copies of these permits and submit them to your office.

23. If Well MW-2 has not been properly destroyed, it must be located and closed properly, because it may act as a conduit for future contaminant infiltration into groundwater.

Refer to item 21 above.

24. A work plan addressing the above additional work . . .

Because we are not able to meet with your agency until April 26, 1999, we request an extension until May 28, 1999, to prepare this work plan to ensure that all of the points discussed in the meeting are addressed.

QST appreciates your consideration of the information expressed in this letter and looks forward to the opportunity of meeting with you to discuss an acceptable conclusion to this case.

Sincerely,
QST ENVIRONMENTAL INC.



Thomas D. Dalzell
Office Manager/Senior Scientist



Rose Scott, R.G.
Senior Geologist

cc: Mr. Tom Moffatt
Core Resource, Inc./Trammel Crow
3800 Hamlin Road, Suite 100
Auburn Hills, Michigan 48326

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

March 15, 1999

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326

STID: 470

Re: Review of the March 1, 1999 Closure Request Report and the requirement for additional work at the Broadway Volkswagen site, located at 2740 Broadway Ave., Oakland, CA

Dear Mr. Moffatt,

This office has received and reviewed QST Environmental's (QST) Site Closure Report, dated March 1, 1999, requesting closure for the above site. The following is a list of our comments on the Site Closure Report and a summary of additional information and work that will be needed for this site to be considered for closure:

- The discussions on risk assessments in the Closure Report compares concentrations of the gas constituents (TPHg and BTEX) to California's Maximum Contaminant Levels (MCLs) and U.S. Environmental Protection Agency's Preliminary Remedial Goals (PRGs), however, application of the more conservative values given in the American Society for Testing and Material's Risk-Based Corrective Action Guidelines (E 1739-95)(ASTM RBCA) are required to assess human health risk. The San Francisco Bay-Regional Water Quality Control Board (RWQCB) has recommended the use of these guidelines for risk assessment purposes. Additionally, if it cannot be confirmed that the VOC concentrations of TCE and DCA are coming from off site, a proper human health risk assessment will be required to address the VOC concentrations.

Having reviewed our files, the highest concentrations of **benzene** in soil have been identified in sample B-D2 at 2.2ppm from 7-feet below ground surface (bgs); in sample B-D1 at 1.4ppm from 13-feet bgs; in sample B-C1 at 1.3ppm from 13-feet bgs; in soil boring SB-3 at 1.2ppm from 10-feet bgs; and boring SB-4 at 0.6ppm from 15-feet bgs. These benzene concentrations in soil exceed ASTM RBCA's Tier 1 table threshold values for the "soil vapor intrusion into outdoor air" pathway (1.3ppm) and the "soil vapor intrusion into indoor air" pathway (0.003ppm) for a commercial site at 10^{-5} risk.

- The Closure Report states that the vapor extraction system probably mitigated the benzene concentrations formerly observed in the on-site soils. However, Verification Monitoring is required to confirm the success of this Corrective Action, per Article 11 Title 23 California Code of Regulations. Therefore, soil samples shall be collected from areas of the site formerly identifying contaminant concentrations of concern. Additionally, mitigation of groundwater contaminants shall be confirmed as well with the sampling of on-site Wells MW-1 and MW-3. Samples shall be analyzed for TPHg and

Tom Moffatt
Re: 2740 Broadway
March 15, 1999
Page 2 of 4

BTEX. If concentrations of benzene in the soils is Non Detect or below ASTM RBCA's Tier 1 table threshold values, then no risk assessment addressing these gas constituents will be required.

This office is also requesting that an explanation be provided as to why contaminant concentrations of TPHg and BTEX were so much higher in the influent samples collected from the groundwater extraction system on August 19, 1997, as compared to the significantly lower concentrations in the on-site wells that had persisted for at least several prior quarterly sampling events.

- Although QST argues that the VOC concentrations on site are coming from off site, the information in our files cannot yet substantiate that claim. Equipotential maps have consistently shown since 1991, that groundwater flows towards the north/northeast in the direction of former off-site Well MW-6, which contained the highest concentrations of TCE. Additionally, an isocentration map for TCE from October 18, 1991 indicates that the highest TCE concentrations were originally on site. This would seem to indicate that concentrations from on site may have migrated to off-site Well MW-6. There has only been one instance, in May 1991, where the groundwater was shown to be flowing to the south. In this case, the groundwater flow direction was determined by only using on-site Wells MW-1, MW-3, and MW-4.

Further investigations need to be conducted to confirm the groundwater gradient, so that this office may be able to accurately compare upgradient concentrations to downgradient concentrations to confirm that the VOCs are, in fact, coming from off site. **Additionally, a detailed investigation shall be conducted to locate any utility lines that may be influencing groundwater flow directions, acting as a conduit for VOC contaminant transport, or providing a conduit for dumping of contaminants.**

According to file searches that were conducted by your consultants in 1991, eight sites in the vicinity of your site were identified as possible sources of the VOC contamination. However, insufficient information has been provided to prove that any of these eight sites are truly the source of the VOC contamination, and none of these sites are typical or definitive sources of VOCs, such as in the case of a dry cleaner. All eight sites were listed as auto-related businesses, such as car dealerships, transportation services, and gas stations.

- It is unclear as to whether the wells were ever surveyed to Mean Sea Level from an established benchmark, or whether these wells were only to an arbitrary benchmark. As part of future investigations, all wells used to determine groundwater flow directions must be surveyed to Mean Sea Level, to assure an accurate gradient determination. Due to ground settlement, an arbitrary benchmark may not prove to be effective in attaining accurate groundwater depths and gradient determinations.

Tom Moffatt
Re: 2740 Broadway
March 15, 1999
Page 3 of 4

- Your consultants have argued that the groundwater at the site is "perched", and that the site's different groundwater flow directions can be attributed, in part, to this "perched" water. However, it appears that groundwater is not only contained in the silty/sand lenses that your consultants have stated carried the "perched groundwater", but also in the clayey soils surrounding these areas. According to boring logs for Wells MW-1 and MW-2, these wells were drilled through solely clayey materials, yet these wells were never dry and never had difficulty in recharging during purging and sampling. Therefore, there only appears to be one aquifer at the site. The silty/sand lenses may provide a preferential flow path for some of the contaminants, however, this office currently has insufficient information to indicate that these areas are perched.
- According to Environmental Science and Engineering's report, dated July 10, 1991, Well MW-2 was found abandoned and improperly destroyed. Was this well ever properly destroyed. If so, you are required to submit the Well Destruction permit for this well to our office. Additionally, please submit a copy of the Well Destruction permit for Wells MW-4, MW-5, and MW-6. If Well MW-2 has not been properly destroyed, it must be located and closed properly, because it may act as a conduit for future contaminant infiltration into groundwater.

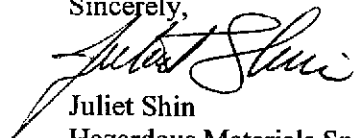
A workplan addressing the above additional work, and possibly a revised risk assessment, shall be submitted to this office within 60 days of the date of this letter (i.e., by May 10, 1999). Any requests for extensions of this deadline shall be submitted to this office in writing.

The State Water Resources Control Board manages an Underground Storage Tank Cleanup Fund (Fund) to help eligible Responsible Parties to obtain reimbursement for costs of investigating and remediating releases from petroleum underground storage tanks. You are encouraged to apply. To obtain an Application Package, contact the Fund at the following:

State Water Resources Control Board
Division of Clean Water Programs
UST Cleanup Fund
P.O. Box 944212
Sacramento, CA 944212
Telephone: (916) 227-4307

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

Sincerely,


Juliet Shin
Hazardous Materials Specialist

Tom Moffatt
Re: 2740 Broadway
March 15, 1999
Page 4 of 4

Cc: Dennis Callahan
QST Environmental
3545 Howard Way, 2nd Floor
Costa Mesa, CA 92626

Larry R. Froebe, Ph.D.
QST Environmental
3534 Howard Way, 2nd Floor
Costa Mesa, CA 92626

Tom Dalzell
QST Environmental
1340 Arnold Drive, Ste 126
Martinez, CA 94553

Alameda County Environmental Health

1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
Telephone (510) 567-6700 FAX (510) 337-9335

FACSIMILE COVER SHEET

TO: Tom Dalzell, QST Environmental 925-313-0844

FROM: Juliet Shin

DATE: 03/15/99

Total number of pages including cover sheet 5

-NOTES- Re. Required work for Broadway Volkswagen site.

Alameda County Environmental Health

1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
Telephone (510) 567-6700 FAX (510) 337-9335

FACSIMILE COVER SHEET *QST Environmental*

TO: Dennis Callahan, 714-426-9027

FROM: Juliet Shin

DATE: 3/15/99

Total number of pages including cover sheet 5

-NOTES- Re: Broadway Volkswagen requirements

1999.03-15 11:28
510 337 9335
ALAMEDA CO EHS HAZ-OPS

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
238	714 4269027	03-15 11:26	01' 43	05/05	OK		

7499402046

Alameda County Environmental Health

1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
Telephone (510) 567-6700 FAX (510) 337-9335

FACSIMILE COVER SHEET *QST Environmental*

TO:

Dennis Callahan, 714-426-9027

FROM:

Juliet Shin

DATE:

3/15/99

Total number of pages including cover sheet

5

-NOTES-

Re: Broadway Volkswagen requirements

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	MARKS
239	510 313 0844	03-15 11:29	01'39	05/05	OK		

7499402046

Alameda County Environmental Health

1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
Telephone (510) 567-6700 FAX (510) 337-9335

FACSIMILE COVER SHEET

TO: Tom Dalzell, QST Environmental 925-313-0844

FROM: Juliet Shin

DATE: 03/15/99

Total number of pages including cover sheet 5

-NOTES- Re. Required work for Broadway Volkswagen site.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



January 9, 1998

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Rd.
Auburn Hills MI 48326

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

RE: Soil and Groundwater Contamination, Discussion of Case Closure Requirements for Broadway Volkswagen, 2740 Broadway, Oakland 94612 (Our site # 470)

Dear Mr. Moffat:

I am writing to follow up on the telephone conference among ourselves, Tom Dalzell and Micah Rapoport of QST Environmental. During the conference, the following points were discussed regarding next steps for case closure:

- A risk evaluation will be performed by a qualified consultant in accordance with the procedures outlined in *ASTM E 1735 - 95 Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites*. The risk evaluation would be used to determine whether the benzene and other contaminants, including chlorinated compounds, remaining in place pose a significant human health risk given the site conditions, whether additional investigation or remediation is needed, and whether any use restrictions would be appropriate for the property. **You may wish to have the risk evaluation done using currently available soil and groundwater data.** However, the consultant indicated that at least one additional round of groundwater sampling is planned.
- If additional groundwater sampling is done, you should analyze for all contaminants of concern, including TPHg, BTEX and HVOCs. Chlorinated compounds still are an issue of concern. I have spoken with both Eva Chu and Tom Peacock of this Office about the matter of HVOC testing, and both of them believe that consideration of HVOC levels is appropriate for case closure.

It seems that some misunderstanding surrounds both Tom Peacock's and Eva Chu's opinions regarding continued testing for HVOCs, and I would like to provide clarification. I spoke with Mr. Peacock immediately following our teleconference. He recalls the case and a meeting he had with you in December of 1992. I have enclosed a copy of the letter Tom Peacock wrote in April of 1993 referring to issues discussed at that meeting. Mr. Peacock said today that he agrees there is evidence of offsite sources. He also has said that he does not believe it has been proven that the HVOCs in your wells actually came from offsite. Also, Eva Chu recently reread the case documents and advised that HVOCs levels should be considered for case closure. Her approval of the 1995 Remedial Action Plan, which omitted any mention of HVOC testing, should not be construed as her approval to discontinue such testing.

Tom Moffat
RE: Broadway Volkswagen
December 30, 1997
Page 2 of 2

Below I have summarized why this office is asking that HVOC concentrations be considered for case closure:

- We are not convinced that the HVOCs found in your wells are coming from an offsite source. It is difficult to draw any definite conclusions from the data about the source of the contamination. Some of the highest concentrations of HVOCs were found in wells located down- or slightly cross-gradient from the 28th St. tank pit. The wells that may have been the best source of information about HVOC plume patterns, MW-5 and MW-6, were closed in March of 1994. The two remaining wells and the new well (MW-7) were not tested for HVOCs after MW-5 and MW-6 were closed.
- HVOCs are one of the array of contaminants found in your wells, and they can not be ignored when considering case closure. In other groundwater contamination cases, this Office routinely requires responsible parties to monitor contaminants of concern that have been identified at the site, especially if there is reason to believe they may have been used or stored there. Chlorinated solvents have been commonly used in automotive repair in recent years. It was not unusual in the past for mechanics to dispose of chlorinated compounds in waste oil tanks. File records indicate that waste oil tanks were located in all three former tank pits. Chlorinated compounds have been known to find their way to groundwater even when they have not been stored in underground tanks, but were used or stored only above ground. In fact, they often are referred to as "sinkers", meaning they tend to migrate downward through soil and into groundwater.
- HVOC concentrations were increasing in all three closed wells (MW-4, MW-5 and MW-6) and fluctuating in MW-3 prior to the last HVOC sampling event in July of 1993.
- Remedial action has depressed TPHg and BTEX levels. It may have had the same effect on HVOC levels. The results of HVOC testing may be favorable to your case for closure.

I understand your concerns regarding testing for HVOCs. I hope that this letter adequately outlines why this Office is asking you to test for these contaminants if further groundwater sampling is done. Micah Rapoport has told me that QST plans to test the monitoring wells soon. As I discussed with Mr. Rapoport, I would not object to a short delay in well testing until you have had a chance to review this letter and other case documents. Let me know if you are still interested in a face to face meeting in the next month. You may contact me at (510)567-6770 with any questions.

Sincerely,



Pamela J. Evans

Senior Hazardous Materials Specialist

c: Tom Peacock, Alameda Count Environmental Health Services
Micah Rapoport, QST Environmental Inc., 1340 Arnold Dr., Suite 126, Martinez CA 94553

files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



December 10, 1997

ENVIRONMENTAL HEALTH SERVICES

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

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Rd.
Auburn Hills MI 48326

**RE: Soil and Groundwater Contamination, Case Closure Requirements for
Broadway Volkswagen, 2740 Broadway, Oakland 94612 (Our site # 470)**

Dear Mr. Moffatt:

I have reviewed the case file and spoken with Micah Rapoport of QST Environmental. I am not able to issue a closure letter at this time for the following reasons:

- Benzene has been detected at concentrations that exceed conservative human health risk screening levels. The highest concentrations of benzene were found in soil that remains in place in the former tank pit (tanks C and D) and from borings done in the sidewalk along 28th St. These sources are located within a few feet of the building. Well data show that benzene was found in groundwater beneath the building itself. Micah Rapoport has told me that soil analysis data also is available from borings done to advance the vapor wells and MW-7. This additional data should tell us more about the extent and concentration of the benzene contamination beyond the tank pit.

An appropriate next step toward case closure is to have a risk evaluation performed by a qualified consultant. The risk assessor needs to follow the procedures outlined in ASTM E 1735 - 95 Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites. The risk evaluation would be used to determine whether the benzene and other contaminant levels (such as chlorinated compounds) remaining in place pose a significant human health risk given the site conditions, whether additional investigation or remediation is needed, and whether any use restrictions would be appropriate for the property.

- At least one additional round of groundwater sampling for fuel constituents (TPHg and BTEX) and chlorinated organic compounds should be done within the next 30 days. While TPHg and BTEX concentrations have dramatically decreased, I remain concerned about chlorinated compounds. Although a letter from this Office dated September, 1994 directed that testing for chlorinated compounds in groundwater should be ongoing, no testing for these compounds is reported after July of 1993. In order to determine current groundwater concentrations, to examine whether shallow and deeper aquifers have similar flow directions and to better establish the source of chlorinated compounds, additional groundwater analysis is needed.

I recently assumed case oversight responsibility from Eva Chu. You may contact me at (510)567-6770 with any questions.

Sincerely,

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Dick Pantages, Alameda County Environmental Health Services / *ELKS*
Micah Rapoport, QST Environmental Inc., 1340 Arnold Dr., Suite 126, Martinez CA 94553

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

August 29, 1997
STID 470

Vorelco, Inc. 4A01
ATTN: Tom Moffatt
3800 Hamlin Rd.
Auburn Hills, MI 48326

Re: 2740 Broadway, Oakland, CA 94612

Dear Tom Moffatt:

This office received and reviewed a Report of Groundwater Monitoring for the above site by ESE dated January 1997. The following comments pertain to this report:

1. You need to test for MTBE during the next monitoring well sampling event.
2. It appears that the treatment system is working very well. This site may be eligible for closure soon. Due to the rapid reduction of benzene in MW-3 you should do another round of monitoring as soon as possible. After all, it has been 8 months since the last round of monitoring was done.

If you have any questions please call this office at (510) 567-6782.

Sincerely,

Thomas F. Peacock, Manager
Hazardous Material Division

c: Gordon Coleman Chief - Files
Manager, Broadway Volkswagen, 2740 Broadway, Oakland, CA
94612
Karen Faber, Environmental Science & Engineering, Inc., 4090
Nelson Ave., Suite J, Concord, CA 94520



Environmental
Science &
Engineering, Inc.

ENVIRONMENTAL
PROTECTION
ST FEB 23 PM 3:34

TO: Alameda County Health Care Services
Agency
1131 Harbor Bay Parkway
Alameda, CA 94502-6577

DATE: February 18, 1997

ATTN: Eva Chu

*2740 Broadway
Oakland, California*

#470
JOB NUMBER: 6595214

SUBJECT: Fourth Quarter 1996 Monitoring Report - CORE Resource, Inc.

WE ARE TRANSMITTING THE FOLLOWING:

One copy of the "Report of Ground Water Monitoring - Fourth Quarter Report" for
Core Resource, Inc. Property No. 4286, 2740 Broadway, Oakland, CA

CC: Tom Moffatt, CORE Resource, Inc.

DIST:

LB

File

Originator

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

BY: *[Signature]*

Karen Faber
Senior Staff Engineer

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

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

StID 470

September 29, 1995

Mr. Tom Moffatt
Core Resources Inc
3800 Hamlin Rd
Auburn Hills, MI 48326

RE: RAP Approval for 2740 Broadway, Oakland 94612

Dear Mr. Moffatt:

I have completed review of ESE's August 1995 Remedial Action Plan for the above referenced site. The proposal to use a soil vapor extraction and water entrainment system to remediate petroleum hydrocarbons in affected soil and groundwater beneath the site is acceptable. Field work should commence within 60 days of the date of this letter, or by **November 30, 1995**. Please notify me at least 72 hours prior to the start of field activities.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

cc: Bart Miller, ESE, 4090 Nelson Ave, Suite J, Concord 94520
Broadway Volkswagen, 2740 Broadway, Oakland 94612
files

345



Environmental
Science &
Engineering, Inc.

ENVIRONMENTAL

95 AUG 29 PM 3:56

*9/22/55
Reference RAB*

TO: Alameda County
Health Care Services Agency
Hazardous Materials Division
1131 Harbor Bay Parkway
Alameda, CA 94502

DATE: August 25, 1995

JOB NUMBER: 6935093

ATTN: Eva Chu

**SUBJECT: BROADWAY VOLKSWAGEN, 2740 BROADWAY, OAKLAND,
CALIFORNIA**


WE ARE TRANSMITTING THE FOLLOWING:

One copy of the Remedial Action Plan for the subject site. Fieldwork will commence upon receipt of your written approval.

CC:

DIST:
LB
File
Originator

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

BY: 
Bart Miller
Project Manager

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

StID 470

March 14, 1995

Mr. Tom Moffatt
Core Resource Inc
3800 Hamlin Rd
Auburn Hills, MI 48326

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

RE: RAP for 2740 Broadway, Oakland 94612

Dear Mr. Miller: *corrected*

I have completed review of ESE's January 1995 Report of Findings, Soil Vapor Extraction Test for the above referenced site. The performance test indicates that soil vapor extraction is a feasible method for remediating contaminated soil in the vicinity of the former fuels tanks beneath 28th Street. As recommended by ESE, a remedial action plan (RAP) should be prepared detailing the design of the system to be used. The RAP is due within 60 days of the date of this letter, or by **May 15, 1995.**

Also, the last sampling event took place in July 1993. At this time, you are directed to reinstate a quarterly schedule of well sampling and monitoring. Technical summary reports documenting each well sampling and monitoring episode are also due quarterly. This schedule shall continue until further notice.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

cc: Bart Miller, ESE, 4090 Nelson Ave, Suite J, Concord 94520
Broadway Volkswagen, 2740 Broadway, Oakland 94612
files



315
Environmental
Science &
Engineering, Inc.

ALSO
Hazardous

95 JAN 21 PM 2:37

TO: Alameda County
Health Care Services Agency
Hazardous Materials Division
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA 94502

DATE: January 27, 1995

JOB NUMBER: 6-93-5093

ATTN: Mr. Thomas Peacock

SUBJECT: BROADWAY VOLKSWAGEN, 2740 BROADWAY, OAKLAND,
CALIFORNIA

WE ARE TRANSMITTING THE FOLLOWING:


One copy of a Report of Findings for a Soil Vapor Extraction Test performed at the subject site.

*Automotive exchange services
may have solvent tank
284 - 28th st.
No JST*

*Dynasty Housing
430 - 28th has remediation going - over site by M. Logan
per Ken Orway. only above gd containers for solvents*

DIST:
LB
File
Originator

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

BY: 
Bart Miller
Project Manager

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

StID 470

September 20, 1994

Mr. Bart Miller
ESE
4090 Nelson Ave, Suite J
Concord, CA 94520

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

RE: Workplan Approval for 2740 Broadway, Oakland 94612

Dear Mr. Miller:

I have completed review of ESE's August 1994 Workplan for Remedial Investigation for the above referenced site. The proposal to conduct a vapor extraction performance test and use the results of this investigation to prepare a remedial action plan is acceptable. Field work should commence within 45 days of the date of this letter, or by **November 7, 1994**. Please notify this office at least 72 hours prior to the start of field work.

Also, quarterly monitoring/sampling of wells MW-1, MW-3, and MW-7 should continue. Groundwater should be analyzed for TPH-G, BTEX, and HVOCs. If you have any questions, I can be reached at (510) 567-6762.

Sincerely,

eva chu
Hazardous Materials Specialist

cc: Tom Moffatt, Vorelco Inc, 3800 Hamlin Rd, Auburn Hills, MI
48326
Broadway Volkswagen, 2740 Broadway, Oakland 94612
files



Environmental
Science &
Engineering, Inc.

STIP 470

TO: Alameda County
Health Care Services Agency
1131 Harbor Bay Parkway
Alameda, CA 94502

DATE: August 26, 1994

ATTN: Mr. Thomas Peacock

JOB NUMBER: 6-93-5093

SUBJECT: VORELCO PROPERTY NO. 4826, 2740 BROADWAY, OAKLAND,
CALIFORNIA

WE ARE TRANSMITTING THE FOLLOWING:

One document entitled "Workplan for Remedial Investigation" for the subject site. ESE will proceed with the activities described in the workplan upon receipt of your written approval.

- ① Appraise vapor extraction performance test
- ② Continue soil sampling of MWs 1, 3, and 7
Analyze for V.H.G., BTEX + H.V.O.C.s.

CC:

DIST:
LB
File
Originator

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

BY: 
Bart Miller
Project Geologist

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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

StID 470

May 31, 1994

Mr. Tom Moffatt
Vorelco Inc
3800 Hamlin Rd
Auburn Hills, MI 48326

**Subject: Additional Investigations at Broadway Volkswagen,
2740 Broadway, Oakland, CA 94612**

Dear Mr. Moffatt:

I have completed review of Environmental Science & Engineering's (ESE) April 1994 Report of Site Activities at the above referenced site. This report documents the abandonment of three monitoring wells and the installation of additional monitoring wells, screened specifically over a perched, wet sand lens at approximately 13-17' depth.

In a recent conversation with Mr. Bart Miller of ESE, there is water in the vapor wells just installed. He proposes to pump the water into a Baker tank, and if this "perched" zone does not recharge, a vapor extraction performance test will be conducted. This proposal is acceptable and field work should commence **within 45 days of the date of this letter**. Please notify this office at least 72 hours prior to the start of field work.

Additional investigations will later be required to determine if the gasoline release from this site has impacted the lower, confined aquifer. A monitoring well should be installed downgradient from the former tank pit, and screened only in the confined aquifer. Groundwater should be analyzed for TPH-G and BTEX. This work may be performed after the vapor extraction test. This office will not require the cleanup of contamination which is from an offsite source.

If you have any questions, please contact Mr. Tom Peacock at the above number.

eva chu
Hazardous Materials Specialist

cc: Bart Miller, ESE, 4090 Nelson Ave, Suite J, Concord 94520
Broadway Volkswagen, 2740 Broadway, Oakland 94612
files (bdwyvw.1)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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

September 23, 1993
STID# 470

Vorelco Inc.
ATTN: Tom Moffatt
3800 Hamlin Rd.
Auburn Hills, MI 48326

Re: 2740 Broadway, Oakland, CA 94612

Dear Tom Moffatt:

This office has received and reviewed the Report of Quarterly Activities, dated August 3, 1993 (with a cover dated September 3, 1993), for the above site by Environmental Science & Engineering, Inc. The recommendations on page 8 are acceptable with the following comments:

1. If you abandon 3 wells you also must realize that the current TPHg plume is not enclosed in the current downgradient direction. You need to explore the installation of an additional well in the westerly direction. This can be done at the time that the vadose wells are being installed.
2. You skipped monitoring for 9 months during the early part of this year. You need to get back on a quarterly schedule. This would give more information so that sound decisions can be made. The data you have especially for groundwater gradient has changed substantially, as an example, which could lead to very different conclusions. Quarterly monitoring helps to see seasonal variation over time.
3. Health based risk assessment to identify cleanup goals is an approach this Department is open to.

If you have any questions concerning this matter please contact this office.

Sincerely,

Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: Broadway Volkswagen, 2740 Broadway, Oakland, CA 94612
Edgar Howell, Chief - Files



Environmental
Science &
Engineering, Inc.

93 SEP -8 PM 4: 26

TO: Alameda County
Health Care Services Agency
80 Swan Way, Room 350
Oakland, CA 94621

DATE: September 3, 1993

ATTN: Mr. Thomas Peacock

JOB NUMBER: 6-93-5093

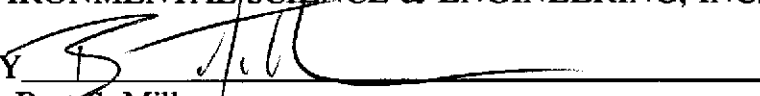
SUBJECT: Broadway Volkswagen, 2740 Broadway, Oakland, California

WE ARE TRANSMITTING THE FOLLOWING:

One Report of Quarterly Activities pertaining to the subject site. Please feel free to contact the undersigned at (510) 685-4053 with any questions or comments.

DIST:
LB
FILE
ORIGINATOR

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

BY 
Bart S. Miller
Senior Staff Geologist

Vorelco, Inc.

3800 Hamlin Road
Auburn Hills, MI 48326

Tel. (313) 340-5501
Fax (313) 340-5525

May 27, 1993

Mr. Thomas Peacock
Alameda County
Department of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

Re: 2740 Broadway, Oakland, CA

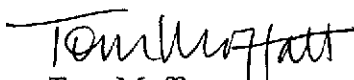
Dear Mr. Peacock:

I am in receipt of your April 12 letter. I have received and am fine tuning a proposal from Environmental Science & Engineering to perform a quarterly monitoring sampling activity as well as to prepare a work plan to remove the existing wells and install vapor recovery wells, and to implement a cleanup utilizing a vapor recovery system.

I anticipate that the quarterly sampling will be completed in mid June, and you should have a work plan near the end of June. We plan to initiate some performance testing on the sparging/vapor extraction system prior to system start-up. The complexity of the site constraints may limit the available locations for the system. We will do our best to define the system in the work plan.

If you have any questions prior to receipt of the work plan, please contact the undersigned at (313) 340-5503.

Sincerely,



Tom Moffatt
Sr. Engineer

cc: Bart Miller - ESE



ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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

April 12, 1993
STID# 470

Vorelco Inc.
ATTN: Tom Moffatt
3800 Hamlin Rd.
Auburn Hills, MI 48326

Re: 2740 Broadway, Oakland, CA 94612

Dear Tom Moffatt:

This office has received and reviewed the Report of Quarterly Activities, dated December 3, 1992, for the above site by Environmental Science & Engineering. The recommendations on page 12 are acceptable with the following comments:

1. The first recommendation has occurred in our meeting in December. This office conducted an investigation of the surrounding area and found a company that uses TCE. This may have been a source of TCE/DCE contamination which has been discovered in some of your wells. This company, across the street, does not have a well and has been apparently disposing of their waste properly for the last 2 years. Without additional investigation there is not enough information to draw conclusions about the source of this contamination or to make recommendations on how to prevent its further contamination of your site. This subject should be discussed in your next Report of Quarterly Activities.
2. You said that you wanted to close 3 of the wells. These wells may be allowing for cross contamination according to ESE. An additional round of sampling should be done to confirm this. Two of these wells are off-site. This is acceptable, provided you do further investigation to define the lateral and verticle extent of contamination.
3. You must continue to submit quarterly groundwater sampling reports to this office. The next report should be due now for sampling done in March 1993.
4. The city sewer line is incorrectly shown on your drawing. According to the city Public Works it begins about 100 ft. to the East and runs east, not towards Broadway as previously thought.
5. It is recommended that you continue a feasibility study to determine the best way to remediate the site. You have already been examining this option and you are encouraged to continue.

Vorelco Inc.
Broadway Volkswagen
STID 470
April 12, 1993
Page 2 of 2

If you have any questions concerning this matter please contact this office.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas F. Peacock".

Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: Lester Feldman, RWQCB
Broadway Volkswagen, 2740 Broadway, Oakland, CA 94612
Edgar Howell, Chief - Files

Vorelco, Inc.

3800 Hamlin Road
Auburn Hills, MI 48326

Tel. (313) 340-5501
Fax (313) 340-5525

October 20, 1992

Mr. Thomas Peacock
Department of Environmental Health
Hazardous Material Division
80 Swan Way, Room 200
Oakland, CA 94612

ST10 470

Re: 2740 Broadway, Oakland, CA

Dear Mr. Peacock:

I am in receipt of your letter of October 1, 1992. Please note that we have moved our offices. I have listed below the new address.

Environmental Science and Engineering is proceeding with the quarterly groundwater sampling. We are discussing possible methods to cleanup the contamination from the underground storage tank. As soon as we have decided on a method that I feel will be effective in achieving the desired result, as well as being cost effective I will inform your office.

Earlier this year we met with Mr. Paul Smith to discuss contamination in the lower groundwater table, which we have determined has come from a off-site source. This contamination is separated from the tank contamination by a "clean" clay layer. I never have received any correspondence from Mr. Smith regarding the responsibility for this contamination, so I believe that it is still an issue that needs to be resolved.

I will keep you informed as we progress in our decision as to which cleanup method we intend to use.

Sincerely,



Tom Moffatt
Construction/Environmental Engineer

New Address:
Vorelco, Inc.
Mail Code 4A01
3800 Hamlin Rd.
Auburn Hills, MI 48326



ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

October 1, 1992
STID# 470

Vorelco Inc.
ATTN: Tom Moffatt
P. O. Box 7050
Troy, MI 48007

Re: 2740 Broadway, Oakland, CA 94612

Dear Tom Moffatt:

This office has received and reviewed the Report of Quarterly Activities, dated November 12, 1991, for the above site by Environmental Science & Engineering. The recommendations on page 14 are acceptable with the following comments:

1. The installation of a vacuum system will probably remove a substantial amount of product in the vapor phase and other phases. No mass balance has been done so it is not known how much product is where. There is no reason to recover only "product" from the recovery well as any volatile substance will be removed by a vacuum system. This should be implemented as soon as possible.
2. This office has not received a quarterly report since the one above, with the last round of sampling being done in May 91, over 1 year ago. Quarterly monitoring results need to be submitted immediately.
3. Attached are Regional Board requirements for closure. This format should be followed so that reports include all necessary information.

If you have any questions concerning this matter please contact this office.

Sincerely,

Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: Lester Feldman, RWQCB
Broadway Volkswagen, 2740 Broadway, Oakland, CA 94612
~~Roger Howell~~, Chief - Files

RFJ

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

September 14, 1992
STID# 470

Vorelco Inc.
ATTN: Tom Moffatt
888 W. Big Beaver Rd.
Troy, MI 48007

P.O. Box 7050
Troy, MI 48007

920707 1113 04
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: 2740 Broadway, Oakland, CA 94612

Dear Tom Moffatt:

This office has received and reviewed the Report of Quarterly Activities, dated November 12, 1991, for the above site by Environmental Science & Engineering. The recommendations on page 14 are acceptable with the following comments:

1. The installation of a vacuum system will probably remove a substantial amount of product in the vapor phase and other phases. No mass balance has been done so it is not known how much product is where. There is no reason to recover only "product" from the recovery well as any volatile substance will be removed by a vacuum system. This should be implemented as soon as possible.
2. This office has not received a quarterly report since the one above, with the last round of sampling being done in May 91, over 1 year ago. Quarterly monitoring results need to be submitted immediately.
3. Attached are Regional Board requirements for closure. This format should be followed so that reports include all necessary information.

If you have any questions concerning this matter please contact this office.

Sincerely,

Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: Lester Feldman, RWQCB
Broadway Volkswagen, 2740 Broadway, Oakland, CA 94612
Edgar Howell, Chief - Files

DATE: 3-5-92

TO : Local Oversight Program

FROM: BRIT JOHNSON

SUBJ: Transfer of Eligible Oversight Case

Site name: BROADWAY VOLKSWAGEN

Address: 2740 BROADWAY city OAK zip 94612

Closure plan attached? Y N DepRef remaining \$ 63,75

DepRef Project # 76 STID #(if any) ~~81118~~ 470

Number of Tanks: 4 removed? Y N Date of removal 8/15/88

Leak Report filed? Y N Date of Discovery 8/15/88

Samples received? Y N Contamination: SOIL & GW

Petroleum Y N Types: Avgas Jet leaded unleaded Diesel
fuel, oil waste oil kerosene solvents

Monitoring wells on site 5 Monitoring schedule? Y N

Briefly describe the following:

Preliminary Assessment PETROLEUM CONTAMINATION BELIEVED TO BE CONFINED TO TANK C/D AREA

Remedial Action RECOVERY WELL PROPOSED IN NOV 1991 QTR REPORT

Post Remedial Action Monitoring _____

Enforcement Action _____

Comments: TANK A 1000 GAL WASTE OIL UST
B 300 GAL WASTE OIL UST
C 550 GAL UNLEADED GASOLINE UST
D 1,500 GAL UNKNOWN UST
(ANOTHER REPORT RALL "D" A 3,000 GALLON GASOLINE UST)
DCE/TCE DETECTED IN GROUND WATER
POSSIBLE OFF-SITE SOURCE



Environmental
Science &
Engineering, Inc.

92 FEB 25 AM 10:55

TO: Alameda County Health Agency
Division of Hazardous Materials
Department of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

DATE: February 17, 1992

ATTN: Mr. Paul Smith

JOB NUMBER: 6-91-5165

SUBJECT: Vorelco Property #4286, Broadway Volkswagon, 2740 Broadway Ave.,
Oakland, California

WE ARE TRANSMITTING THE FOLLOWING:

Information on groundwater sampling with hydropunch as discussed at
our recent meeting of February 13, 1992.

Prop: Vorelco Inc
Attn: Tom Maffatt
888 W. Big Beaver Rd
Troy MI 48007

Bs: Bway VW
2740 Bway
Oak 612

8006619

8-15-88

CC:

DIST:
LB
FILE
ORIGINATOR

Sincerely,
ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

BY

Bart S. Miller
Senior Staff Geologist



Environmental
Science &
Engineering, Inc.

TO: Alameda County Department of Environmental
Health
Hazardous Materials Program
80 Swan Way, Room 200
Oakland, CA 94621

DATE: November 22, 1991

8/NOV 26 10:10:30

ATTN: Mr. Paul Smith

JOB NUMBER: 6-91-5165

SUBJECT: Broadway Volkswagen, 2740 Broadway Avenue, Oakland, California

WE ARE TRANSMITTING THE FOLLOWING:

One Report of Quarterly Activities for the subject facility. Should you have any questions or comments, please contact Bart Miller or Susan Wickham at (510) 685-4053.

CC: Lester Feldman, RWQCB

Best Regards,

DIST:
LB
FILE
ORIGINATOR

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

BY 

Bart S. Miller
Senior Staff Geologist

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

October 1, 1991

Mr. Tom Moffatt
Construction Engineer
Vorleco Inc.
888 West Big Beaver Road
PO Box 7050
Troy, Michigan 48007-7050

**Re: Site Remediation Broadway Volkswagen
2740 Broadway Ave., Oakland, CA 94612**

Dear Mr. Moffatt:

Alameda County Environmental Health, Hazardous Materials Division is in receipt of the Report of Quarterly Activities for Broadway Volkswagen, dated July 10, 1991, prepared by Environmental Science and Engineering (ESE).

The Quarterly Monitoring Report outlines the completion of 5 soil borings and the installation of 1 monitoring well (mw-4). Soil contamination as high as 740 ppm of Total Volatile Hydrocarbons (TVH) as gasoline, and 1,200 ppb of benzene were detected. Water samples revealed contamination as high as 81,000 ppb TVH, 7,800 ppb benzene, 660 ppb trichloroethylene (TCE), and 380 ppb of dichloroethane (1,2 DCA).

We have also reviewed the latest Work Plan for Further Site Investigation, dated August 20, 1991, prepared by ESE.

The Work Plan proposes the destruction of an existing improperly abandoned monitoring well mw-2 through the necessary Alameda County Water District (Zone 7) permit process. The Work Plan also calls for the installation of 2 off site monitoring wells in the upgradient direction.

The proposal as specified is acceptable. You are requested to meet the following requirements:

- 1) When analyzing for volatile halocarbons you are requested to run analysis on one of the proposed off site wells using EPA method 8240. This method will detect additional halogenated and non halogenated volatile organic compounds which method 8010 is not able to detect. When re-sampling mw-4 you are also requested to use method 8240. If after comparing the mw-4 analytical results from the previous method 8010 analyses, no new compounds are detected, future halocarbon analyses may then be performed using method 8010.

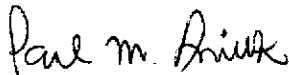
Mr. Tom Moffatt
October 1, 1991
page 2 of 2

2) You are requested to have ESE notify this Department at least 48 hours to the installation or removal of wells at the above site, this will permit a representative from this office (if possible) to witness the work being performed at the site.

Finally, a review of our records indicates that the balance of the deposit submitted with the initial underground tank removal closure submittal has been exhausted. Please submit to our office a check made payable to County of Alameda for \$500.00. This deposit is authorized by Section 3-141.6 of the Ordinance Code of the County of Alameda and is used to cover expenses incurred by Alameda County personnel in the discharge of their oversight duties associated with this project. Records are maintained of the time County employees commit to a project and the deposit is charged at an hourly rate of \$ 67.00 per hour. Upon the completion of the project the balance of the deposit will be returned to you.

If you have any questions regarding the content of this letter please contact me at (415) 271-4320.

Sincerely,



Paul M. Smith
Hazardous Materials Specialist

cc:

Bart Miller/Susan Wickham, Environmental Science and Engineering
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Protection
Lester Feldman, RWQCB
Emil Paul, General Manager, Broadway Volkswagen

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

August 1, 1991

Mr. Tom Moffatt
Construction Engineer
Vorleco Inc.
888 West Big Beaver Road
PO Box 7050
Troy, Michigan 48007-7050

**Re: Site Remediation Broadway Volkswagen
2740 Broadway Ave., Oakland, CA 94612**

Dear Mr. Moffatt:

Alameda County Environmental Health, Hazardous Materials Division has received and reviewed the Report of Quarterly Activities for Broadway Volkswagen dated July 10, 1991, prepared by Environmental Science and Engineering (ESE).

The Quarterly Monitoring Report outlines the completion of 5 soil borings and the installation of 1 monitoring well (mw-4). Soil contamination as high as 740 ppm of Total Volatile Hydrocarbons (TVH) as gasoline, and 1,200 ppb of benzene were detected. Water samples revealed contamination as high as 81,000 ppb TVH, 7,800 ppb benzene, 660 ppb trichloroethylene (TCE), and 380 ppb of dichloroethane (1,2 DCA).

The report recommends that two additional monitoring wells be installed upgradient from mw-3 in order to "identify contaminant sourcing beyond the subject facility". It also recommends an additional monitoring well and three to four hydropunch samples to be located in the down gradient direction from mw-4, in order to determine the extent of product migration. The destruction of mw-2 under authorization from Alameda County Zone 7 is also recommended.

We concur with these recommendations. The following items need to be incorporated into the next work plan which should address the following activities :

- 1) The locations of proposed borings, probes and monitoring well construction.
- 2) The types of chemical analyses which will be conducted for the above and the frequency of well monitoring.
- 3) A projected time line for the completion of the investigative phase of all contaminants and for the implementation of a remediation system which will effectively mitigate the contamination at the above site.

Mr. Tom Moffatt
August 1, 1991
page 2 of 2

You are requested to submit a work plan which should include but should not be limited to the above requested information in order to adequately delineate the nature and extent of contamination at the above site within 45 days of the receipt of this letter.

If you have any questions, please contact me at (415) 271-4320.

Sincerely,



Paul M. Smith
Hazardous Materials Specialist

cc:

Bart Miller/Susan Wickham, Environmental Science and Engineering
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Protection
Lester Feldman, RWQCB
Emil Paul, General Manager, Broadway Volkswagen



Environmental
Science &
Engineering, Inc.

July 10, 1991

Project No. 6-91-5165

Mr. Paul Smith
Alameda County Department of Environmental Health
Hazardous Materials Program
80 Swan Way, Room 200
Oakland, California 94621

SUBJECT: Report of Quarterly Activities at Broadway Volkswagen, 2740 Broadway,
Oakland, California

Dear Mr. Smith:

The enclosed Report of Quarterly Activities prepared by Environmental Science & Engineering, Inc. (ESE) documents the findings of the site investigation and monitoring activities. We are currently preparing workplans for client review for the recommended work.

Please contact Susan S. Wickham at (415) 685-4053 should you have any questions or comments concerning the enclosed report.

Sincerely,

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

Susan S. Wickham, RG 3851
Senior Hydrogeologist

SSW:gm

cc: Tom Moffat, Vorelco
RWQCB, Oakland

F:\...5165\71091.RPT

91 JUL 12 07:11:56

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

May 6, 1991

Mr. Tom Moffatt
Construction Engineer
Vorleco Inc.
888 West Big Beaver Road
PO Box 7050
Troy, Michigan 48007-7050

**Re: Site Remediation Broadway Volkswagen
2740 Broadway Ave., Oakland, CA 94612**

Dear Mr. Moffatt:

Alameda County Environmental Health, Hazardous Materials Division has received and reviewed the Workplan for Site Assessment for the above site. The plan calls for the installation of 4 soil borings to delimit the extent of subsurface contamination, the installation of and additional groundwater monitoring well and the re-initiation of quarterly monitoring reports.

The workplan as proposed is hereby approved however additional investigatory work is necessary in order to adequately delineate contamination both onsite and offsite.

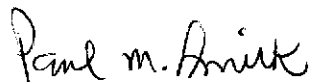
In order to properly define the extent of the contamination which may extend offsite you are requested to submit an additional workplan which will define the nature and extent of the contamination to soil and groundwater which appears to be associated with monitoring well three. When taking groundwater samples from each of the wells you are requested to analyze samples for the presence of Chlorinated Solvents utilizing EPA method 601 or 624. You are also requested to analyze one soil sample taken from one of the 2 borings done at each of the former tank excavation areas for the 5 ICAP metals (Cd, Cr, Pb, Ni, & Zn), and for Chlorinated Solvents using method 8010 or 8240.

Mr. Tom Moffatt
May 6, 1991
page 2 of 2

You are requested to submit an additional workplan specifying proposed activity to adequately delineate the nature and extent of contamination at the above site within 45 days of the receipt of this letter.

If you have any questions, please contact me at (415) 271-4320.

Sincerely,



Paul M. Smith
Hazardous Materials Specialist

cc:

Susan Wickham, Environmental Science and Engineering
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Protection
Howard Hatayama, DHS
Lester Feldman, RWQCB
Emil Paul, General Manager, Broadway Volkswagen



Environmental
Science &
Engineering, Inc.

91 MAR 15 AM 10:42

March 14, 1991

Project No. 6-91-5165

Mr. Paul Smith
Alameda County
Department of Environmental Health
Hazardous Materials Program
80 Swan Way, Rm 200
Oakland, California 94621

SUBJECT: Request for Extension for Site Investigation Workplan for Broadway Volkswagen, 2740 Broadway Ave., Oakland, California 94612

Dear Mr. Smith:

Environmental Science & Engineering, Inc. (ESE) was retained by Vorelco on February 1, 1991 to prepare and implement workplans for the subject site in response to your letter of December 10, 1991. As you discussed with Mr. Oliver Christen of ESE, we request a one-week extension of the time limit to prepare a specific workplan for a subsurface investigation at the site. Engineering Science has finally agreed to release data concerning their work at the site. ESE will review the previous work in order to prepare the workplan.

The proposed schedule is as follows:

March 13-19, 1991	Obtain and Evaluate Existing and Surrounding Site Data
March 19 1991	Submit findings of investigation to Vorelco with draft workplan for further work
March 22, 1991	Submit Workplan to County and Regional Board for Review and Approval

Page 2
Mr. Smith
March 14, 1991

Please contact Sue Wickham at (415) 685-4053 with any questions regarding this request.

Sincerely,
ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

Susan Wickham

Susan S. Wickham, RG 3851
Staff Hydrogeologist

cc: Mr. Lester Feldman, RWQCB
Mr. Tom Moffat, Vorelco

f:\5165\ext



Environmental
Science &
Engineering, Inc.

91 FEB 11 AM 10:43

February 7, 1991

Project No. 6-91-5165

Mr. Paul Smith
Alameda County
Department of Environmental Health
Hazardous Materials Program
80 Swan Way, Rm 200
Oakland, California 94621

SUBJECT: Request for Extension for Site Investigation Workplan for Broadway
Volkswagen, 2740 Broadway Ave., Oakland, California 94612

Dear Mr. Smith:

Environmental Science & Engineering, Inc. (ESE) was retained by Vorelco on February 1, 1991 to prepare and implement workplans for the subject site in response to your letter of December 10, 1991. We request a one-month extension of the time limit to prepare a specific workplan for a subsurface investigation at the site. In this time period, ESE will examine and evaluate all existing data pertaining to historic and remedial information at the site; perform a records search of properties within a specific area around the facility; and obtain information regarding the former underground tanks at the site, hazardous material spills in the vicinity, and regional hydrogeology. As outlined in the proposal submitted to you by Vorelco for this work, ESE must access subcontractor files for removal of soil from the site.

The proposed schedule is as follows:

February 6-March 6, 1991	Obtain and Evaluate Existing and Surrounding Site Data
March 8, 1991	Submit findings of investigation to Vorelco with draft workplan for further work
March 18, 1991	Submit Workplan to County and Regional Board for Review and Approval

Page 2
Mr. Smith
February 6, 1991

Please contact Sue Wickham at (415) 685-4053 with any questions regarding this request.

Sincerely,
ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

Susan Wickham/sj

Susan S. Wickham, RG 3851
Staff Hydrogeologist

cc: Mr. Lester Feldman, RWQCB
Mr. Tom Moffat, Vorelco

f|..5165\ext

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

Certified Mailer # P 062 128 304

December 10, 1990

Mr. Tom Moffatt
Construction Engineer
Vorleco Inc.
888 West Big Beaver Road
PO Box 7050
Troy, Michigan 48007-7050

**RE: The Proposal for Site Assessment for Broadway Volkswagen
2740 Broadway Ave., Oakland, CA 94612**

Dear Mr. Moffatt:

We are in receipt of the proposal for site Assessment for the above site dated November 14, 1990 by the Environmental Science and Engineering Inc. (ESE). The plan proposes three phases of work. These include:

Phase I- To examine and evaluate all existing data pertaining to historic and remedial information at this site. A records search of properties within a specified proximity to the above facility, to obtain information on hazardous materials storage or releases, and hydrogeology

Phase II- Will develop a specific workplan based upon the findings of Phase I. The workplan will propose soil borings, excavation (if necessary) and additional ground water monitoring wells to delineate the extent of soil and water contamination. The proposed Report/Workplan will be submitted to Alameda County Health Dept. for review prior to implementation.

Phase III- Will install three additional groundwater monitoring wells at the site, and implement Quarterly monitoring of these wells and the three existing wells at the site, for 4 quarters. Ground water monitoring data collected will contain elevation measurements, and analytical data for TPH and BTEX,

P 062 128 304

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Registered Delivery Fee	
Return Receipt, showing to whom and Date Delivered	
Return Receipt, showing to whom Delivered and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3800, June 2, 1985

Instructions:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece and the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to: **470 JE**
Tom Moffatt
Vorelco Inc.
898 W. Big Beaver Rd.
Troy MI 48007

4a. Article Number
869531740

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
APR 6 1992

5. Signature (Addressee)

6. Signature (Agent)
[Signature]

8. Addressee's Address (Only if requested and fee is paid)

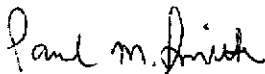
Mr. Moffatt
December 10, 1990
Page 2 of 2

The three phased approach, briefly mentioned above, recommended by your consultant (ES&E) sounds like a reasonable next step approach in appraising the extent of contamination at this site. I shall await a workplan describing the specifics of borings, wells, further excavation (if necessary), previous soil disposal, monitoring and analytical sampling. You are requested to provide the workplan to both this office and the Regional Water Board within 60 days of the receipt of this letter. Reports to the Regional Board should be addressed to:

Lester Feldman
San Francisco Regional Water Quality Control Board
1800 Harrison Street, Suite 700
Oakland, CA 94612

If you have any questions, please contact me at (415) 271-4320.

Sincerely,



Paul M. Smith
Hazardous Materials Specialist

cc:

Susan Wickham, Environmental Science and Engineering Inc.
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Protection
Howard Hatayama, DHS
Lester Feldman, RWQCB
Emil Paul, General Manager, Broadway Volkswagen

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

October 22, 1990

Mr. Tom Moffatt
Construction Engineer
Vorleco Inc.
888 West Big Beaver Road
PO Box 7050
Troy, Michigan 48007-7050

**RE: Site Remediation Broadway Volkswagen
2740 Broadway Ave., Oakland, CA 94612**

Dear Mr. Moffatt:

This letter is in response to the underground tank removal report dated February, 1989 and deposit which was recently received by this office. This report combined with information in reports dated February 10, 1989 and March 14, 1989 from Hunter Environmental Services constitutes the sum total of information currently available at this office in dealing with the tank removals and contamination at the above site. We also received a recent letter dated September 10, 1990 to you by Susan Wickham with Environmental Science & Engineering (ESI) formerly Hunter/Gregg.

Based on the above reports the following concerns need to be addressed with respect to the remediation of the above site:

Did over excavation occur following the initial soil contamination during any of the tank removals?

What became of the stockpiled soils from each tank excavation?

Based on the conclusions of the January 89' report the vertical and lateral extent of soil contamination in the tank excavations has not been completely delineated. Soil contamination levels of 840 ppm Total Petroleum Hydrocarbon (TPH) and 2400 ppm Oil and Grease (O&G) surrounding tank B, and 2900 ppm TPH 1200 ppm O&G surrounding the soil of tank D were detected. You are requested to submit a proposal to address the chosen method for the delineation of contaminated soils surrounding the tank excavation and a plan to deal with the contamination once the assessment is complete.

Groundwater monitoring wells identified benzene levels of 53 ppb in monitoring well 1 and 9600 ppb in monitoring well 3. You are requested to initiate quarterly monitoring of each of the established wells. Quarterly monitoring reports must include

Mr. Tom Moffatt
October 22, 1990
Page 2 of 2

depth to groundwater data in order to establish hydraulic gradient and chemical analysis for Benzene, Toluene, Ethylbenzene, and Xylene (BTEX), (TPH), and heavy metals (Cd, Cr, Pb, Ni, Zn) by either ICAP or AA. All laboratory analysis must be performed by a CA certified lab. You are requested to submit a proposal to identify the extent of water contamination and a plan to remediate the contamination at this site.

Please respond to the above requests for information within 30 days of the receipt of this letter.

If you have any questions, please contact me at (415) 271-4320.

Sincerely,

Paul M. Smith
Hazardous Materials Specialist

cc:

Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Protection
Howard Hatayama, DHS
Lester Feldman, RWQCB
Emil Paul, General Manager, Broadway Volkswagen

LS



Environmental
Science &
Engineering, Inc.

RECEIVED
VORELCO INC.

SEP 11 1990

Construction

September 10, 1990

Mr. Tom Moffatt
Vorelco, Inc.
888 West Big Beaver Road
Troy, Michigan, 48007-7050

SUBJECT: Site Investigation, Broadway Volkswagen, 2740 Broadway, Oakland, California

Dear Mr. Moffatt:

Per your request, I have reviewed the files for the site investigation conducted in early 1989 for the subject facility.

In my last conversation with Mr. Tom Peacock, Alameda County Department of Environmental Health representative assigned to this site in early 1989, we discussed the site investigation report prepared by Hunter/Gregg (now known as Environmental Science & Engineering, Inc.) dated February 10, 1989. Ground-water levels reported in the monitoring wells installed at the site showed a westward gradient instead of the known regional gradient to the southeast, toward Lake Merritt. The southeast regional gradient was reported by Mr. Peacock at an earlier date and also follows regional topography. As stated in the conclusions of the February 1989 site investigation report, local perched ground water conditions may account for this difference.

Bay Mud clays, which are present throughout this area, contain sand lenses which are saturated with respect to underlying clays. This condition is called a perched ground-water condition and is common in the San Francisco Bay area. Due the presence of perched conditions, wells which monitor perched sand may have locally different water levels than the ground-water table in the surrounding area.

Verification of the ground-water levels in the wells was the only request Mr. Peacock made regarding the site investigation and site closure request. The additional water level data were submitted to Mr. Peacock in a letter dated March 14, 1989 (attached).

Please let me know if ESE can be of any additional assistance with this site.

Sincerely,
ENVIRONMENTAL SCIENCE & ENGINEERING, INC.

Susan S. Wickham

Susan S. Wickham, RG
Staff Hydrogeologist

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



ALAMEDA COUNTY DEPARTMENT
OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
80 SWAN WAY, SUITE 200
OAKLAND, CA 94621

Telephone Number: (415)

August 28, 1990

Mr. Tom Moffatt
Construction Engineer
Vorleco Inc.
888 West Big Beaver
P.O. Box 7050
Troy, Michigan 48007-7050

**RE: Remediation, Deposit/Refund at Broadway Volkswagen
2740 Broadway, Oakland, CA 94612**

Dear Mr. Moffatt,

I received your letter dated August 22, 1990 requesting a 30 day extension in order to compile the data necessary to evaluate the disposition of the above site. An extension until September 30, 1990 is granted. Please be advised that this department does not consider the case to have been adequately completed and therefore requires further investigation and mitigation of the contamination at this site.

If you have any questions, please contact me at (415) 271-4320.

Sincerely,

Paul M. Smith

Paul M. Smith
Hazardous Materials Specialist

cc:
Gil Jensen, Alameda County District Attorney's Office of Consumer
and Environmental Protection
Howard Hatayama, DHS
Lester Feldman, RWQCB
John Northington, Broadway Volkswagen

VORELCO



Vorelco, Inc.
888 West Big Beaver
P.O. Box 7050
Troy, MI 48007-7050
Tel (313) 362-7272

August 22, 1990

Paul M. Smith
Department of Environmental Health
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621

Re: Remediation, Deposit/Refund at Broadway VW
2740 Broadway, Oakland, CA 94612

Dear Mr. Smith:

I am presently compiling the information your office requested on July 25, 1990 for the above-referenced facility. Due to the fact that this project was completed several years ago, it is taking longer than usual to gather all of the necessary information. As a result I am requesting a 30-day extension to the original date of 8-30-90 for our office to submit the information outlined in your letter dated July 25, 1990.

If you have any questions, please contact Tom Moffatt at (313) 362-7296.

Sincerely,

A handwritten signature in cursive script that reads "Tom Moffatt".

Tom Moffatt
Construction Engineer

TNM/pjw

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



July 25, 1990

Mr. W. H. Devine
General Manager
Vorleco Inc.
888 West Big Beaver Road
Troy, Michigan 48007-7050

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

**RE: Remediation, Deposit/Refund at Broadway Volkswagen
2740 Broadway, Oakland, CA 94612**

Dear Mr. Devine,

This letter is in regard to the need for information pertaining to the remediation effort at Broadway Volkswagen Dealership located at the above address. A report produced by Hunter Environmental Services dated February 10, 1989 identified contamination levels in two of the three monitoring wells installed onsite. Since that date no records or additional monitoring data have been received addressing this contamination.

The following concerns need to be addressed in order to adequately define the contamination at this site:

- 1) Submit/resubmit all available reports and data collected with regard to the underground tanks which were removed at the above site.
- 2) Submit copies of manifests for the underground storage tanks and any soil which was removed from this site.
- 3) A review of the records indicates that the balance of the deposit submitted in regards to the underground storage tank removal conducted at the above location is nearly depleted and therefore insufficient to cover remaining costs anticipated for this project. Please submit to our office a check made payable to the county of Alameda for \$ 500.00.

This deposit is authorized by Section 3-141.6 of the Ordinance Code of the County of Alameda and is used to cover expenses incurred by Alameda County personnel in the discharge of their oversight duties associated with this project. The deposit is charged at an hourly rate. Upon completion of the project the unused portion of the balance will be returned to you.

Mr. W.H. Devine
Vorleco Inc.
July 25, 1990
Page 2 of 2

You are requested to submit the above information to this office within 30 days of the receipt of this letter or by August 30, 1990.

If you have any questions, please contact me at (415) 271-4320.

Sincerely,

Paul M. Smith

Paul M. Smith
Hazardous Materials Specialist

cc:

Gil Jensen, Alameda County District Attorney's Office of Consumer
and Environmental Protection
Howard Hatayama, DHS
Lester Feldman, RWQCB
John Northington, Broadway Volkswagen

waste min
Tues Nov. 6 9-11

2/2/89 FAC. FILE
 1/3/89 ALAMEDA COUNTY
 STATE OF CALIFORNIA DEPARTMENT OF ENVIRONMENTAL HEALTH
 HAZARDOUS MATERIALS

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input type="checkbox"/> NO		FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I AM A DESIGNATED GOVERNMENT EMPLOYEE AND THAT I HAVE REPORTED THIS INFORMATION TO LOCAL OFFICIALS PURSUANT TO SECTION 25160.7 OF THE HEALTH AND SAFETY CODE. <u>Susan Wickham</u> SIGNED _____ DATE _____		
REPORT DATE 0 <u>1</u> <u>1</u> <u>8</u> <u>8</u> <u>9</u> <small>M M D D Y Y</small>		CASE #				
REPORTED BY	NAME OF INDIVIDUAL FILING REPORT Susan Wickham		PHONE (415) 372-3637		SIGNATURE <u>Susan Wickham</u>	
	REPRESENTING <input type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> LOCAL AGENCY <input checked="" type="checkbox"/> OTHER <u>Consultant</u>		COMPANY OR AGENCY NAME Hunter Environmental			
	ADDRESS 597 Center Ave. Suite 350 Martinez CA 94510					
RESPONSIBLE PARTY	NAME Vorelco, Inc. <input type="checkbox"/> UNKNOWN		CONTACT PERSON Mike Yang		PHONE (213) 390-7415	
	ADDRESS 11300 Playa Street Culver City CA 90231					
SITE LOCATION	FACILITY NAME (IF APPLICABLE) Broadway Volkswagen		OPERATOR		PHONE ()	
	ADDRESS 2743 Broadway <u>Oakland</u> <u>Alameda</u> <small>STREET CITY COUNTY ZIP</small>					
	CROSS STREET 27th & 28th		TYPE OF AREA <input checked="" type="checkbox"/> COMMERCIAL <input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> RURAL <input type="checkbox"/> RESIDENTIAL <input type="checkbox"/> OTHER		TYPE OF BUSINESS <input type="checkbox"/> RETAIL FUEL STATION <input type="checkbox"/> FARM <input type="checkbox"/> OTHER	
IMPLEMENTING AGENCIES	LOCAL AGENCY Alameda County Environmental Health		AGENCY NAME		CONTACT PERSON Thomas Peacock Sr.	
	REGIONAL BOARD				PHONE (415) 271-4320	
SUBSTANCES INVOLVED	(1) Diesel		NAME		QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN	
	(2) Waste Oil				<input checked="" type="checkbox"/> UNKNOWN	
DISCOVERY/ABATEMENT	DATE DISCOVERED 0 <u>8</u> <u>1</u> <u>5</u> <u>8</u> <u>8</u> <small>M M D D Y Y</small>		HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> TANK TEST <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> OTHER			
	DATE DISCHARGE BEGAN <input checked="" type="checkbox"/> UNKNOWN		METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> REMOVE CONTENTS <input type="checkbox"/> REPLACE TANK <input type="checkbox"/> CLOSE TANK <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> CHANGE PROCEDURE <input checked="" type="checkbox"/> OTHER <u>Remove Tank</u>			
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE <u> </u>					
SOURCE/CAUSE	SOURCE OF DISCHARGE <input checked="" type="checkbox"/> TANK LEAK <input type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER		TANKS ONLY/CAPACITY 3000 & 1000 GAL. AGE 550 YRS <input checked="" type="checkbox"/> UNKNOWN		MATERIAL <input type="checkbox"/> FIBERGLASS <input type="checkbox"/> STEEL <input type="checkbox"/> OTHER	
	CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> CORROSION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> SPILL <input type="checkbox"/> OTHER					
CASE TYPE	CHECK ONE ONLY <input checked="" type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)					
CURRENT STATUS	CHECK ONE ONLY <input checked="" type="checkbox"/> SITE INVESTIGATION IN PROGRESS (DEFINING EXTENT OF PROBLEM) <input type="checkbox"/> CLEANUP IN PROGRESS <input type="checkbox"/> SIGNED OFF (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> NO FUNDS AVAILABLE TO PROCEED <input type="checkbox"/> EVALUATING CLEANUP ALTERNATIVES					
REMEDIAL ACTION	CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS) <input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> OTHER (OT)					
COMMENTS	Soil excavated to extent possible. Monitoring wells on progress					

STRAIGHT BILL OF LADING
ORIGINAL - NOT NEGOTIABLE

Shipper's No. _____

CARRIER: ERICKSON TRUCKING INC.

SCAC

Carrier's No. 019
Date _____

TO: Consignee
Street LEVIN METAL CORP.
600 SOUTH 4TH STREET
Destination RICHMOND, CA Zip 94805

FROM: Shipper
Street ERICKSON INC.
255 FARR BLVD.
Origin RICHMOND, CA Zip 94801

Route: _____ Vehicle Number 901485

No. Shipping Units	Kind of Packages, Description of Articles (IF HAZARDOUS MATERIALS - PROPER SHIPPING NAME)	HAZARD CLASS	I.D. Number	WEIGHT (Subject to correction)	RATE	LABELS REQUIRED (or exemption)
4	Non-DOT regulated material Gas Free, Triple rinsed underground tanks for scrap	NONE	N/A	N/A	N/A	NONE
	<u>4272/1024</u>					
	<u>4281/1010</u>					
	<u>4284/1017, 1020</u>					

Remit C.O.D. to: Address: _____ City: _____ State: _____ Zip: _____
COD Amt: \$
 C.O.D. FEE: Prepaid Collect \$
 FREIGHT CHARGES: PREPAID COLLECT

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ Per _____
 Subject to Section 7 of the conditions, if this bill of lading is used in connection with a consignment without receipt on the consignment, the carrier shall sign the following receipt on the bill of lading: The carrier shall not make delivery of the described property without receipt of the consignee.

RECEIVED, subject to the classifications and properly filed tariffs in effect on the date of issue of this Bill of Lading, the property described above in apparent good order, except as noted hereon and condition of contents of packages unknown, marked, counted, and received as indicated above, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, and property over all or any portion of said route to destination, and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions of the governing classification on the date of shipment.
 Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his agents.

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transport in accordance with the regulations of the Department of Transportation.
 PLACARDS REQUIRED NO PLACARDS SUPPLIED YES NO - FURNISHED BY CARRIER DRIVER SIGNATURE: _____

SHIPPER: ERICKSON INC. CARRIER: ERICKSON TRUCKING INC.
 PER: S. LOWRY PER: ALBERT DAVIS
 DATE: 8-22-88 DATE: 8/22/88

THIS IS TO CERTIFY that the following described commodity was received, counted, marked, or received by a weighmaster, whose signature is on this certificate, who is a responsible authority of accuracy, as prescribed by Chapter 7 concerning with Section 27020 of Division 9 of the California Business and Professions Code, as authorized by the Director of Measurement Standards of the California Department of Food and Agriculture.

LMC 410 (2-88)

LMC METALS
A DIVISION OF SIMSMETAL USA CORPORATION

600 SOUTH 4th STREET RICHMOND, CALIFORNIA 94804 (415) 236-0203

1800 MONTEREY HIGHWAY SAN JOSE, CALIFORNIA 95112 (408) 284-8443

130 NORTH 12th STREET SACRAMENTO, CALIFORNIA 95814 (916) 444-3280

740 NORTH WILSON WAY STOCKTON, CALIFORNIA 95206 (209) 488-8876

880 SEAPORT BLVD. REDWOOD CITY, CALIF. 94063 (415) 388-4181

DATE: 8/22/88

95176

TYPE OF PURCHASE: CASH CHECK ON ACCT V.C. PRE PAID

VENDOR: 9 CHECK NO. _____

GROSS WEIGHT: 37140.1b NET WEIGHT: 3740 N.T. 40 PER N.T. _____ PER LT. _____

TARE: 10:01 08/22/88 29660 1b

COMMODITY: 4 TANKS CODE: 1101 DR. _____ PR BY: 1 CR BY: TJ WEIGHT FOR: ERICKSON TRUCKING

DRIVER'S NAME: _____ DRIVER'S LICENSE NO. _____ VEHICLE LICENSE/LMC NO. _____ R/R CAR NO./TRAILER LIC. NO. _____

DAMAGE OR EXCESS TARE - EXPLAIN BELOW: 1024 1010 1017 1020

POINT OF ORIGIN: _____

LMC METALS WEIGHMASTER: _____ FOR SALVAGE VEHICLE SALES: I hereby certify, under penalty of perjury, that any vehicle sold hereon has been cleared for dismantling with the Department of Motor Vehicles. HOLD HARMLESS AGREEMENT: Seller will indemnify and hold buyer harmless from damages, demands and liabilities, including reasonable attorney's fees, resulting from the breach of any warranty hereunder and driver agreed to be responsible for damage to vehicle during unloading. BILL OF SALE: I warrant that I am the owner (or owner's representative) of the material described hereon and have the right to sell same, that it contains no hazardous material as defined by Federal or State law and that for whatever reason received, I sell and convey title to LMC METALS.

SIGNATURE OF SELLER OR AGENT: ALBERT DAVIS