

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



7

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

August 21, 2006

Gary A. Thompson
Thompson & Thompson Fence Co. Inc.
2584 Grant Ave.
San Lorenzo, CA 94580

Dear Mr. Thompson:

Subject: Fuel Leak Case Number [REDACTED], Thompson & Thompson Fence Co. Inc., 2584 Grant Avenue, San Lorenzo, CA

Alameda County Environmental Health (ACEH) staff has reviewed the recently submitted document entitled "Groundwater Monitoring Report", dated October 7, 2005 and prepared by Ninyo & Moore. According to a letter from this office dated May 26, 2005 you are required to perform quarterly groundwater monitoring at your site to expedite the regulatory closure process. We have not received the 2006 Quarterly Groundwater Monitoring Report, as required by this office. For your site to return to compliance please complete the required quarterly groundwater monitoring and submit the 3rd Quarter 2006 Groundwater Monitoring Report to this office.

Based on ACEH staff review of the case file, we request that send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett) according to the following schedule:

- **September 15, 2006** – 3rd Quarter 2006 Groundwater Monitoring Report
- **December 15, 2006** – 4th Quarter 2006 Groundwater Monitoring Report
- **March 15, 2006** – 1st Quarter 2007 Groundwater Monitoring Report
- **June 15, 2006** – 2nd Quarter 2007 Groundwater Monitoring Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR

Gary Thompson
August 18, 2006
Page 2

Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

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

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

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming

Gary Thompson
August 18, 2006
Page 3

ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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

If you have any questions, please contact me at (510) 383-1767.

Sincerely, ⁽¹⁾ ORIGINAL & COPIES SIGNED

(2) GREEN FILE COPY SIGNED GA 8-25-06

Steven Plunkett
Hazardous Materials Specialist
Local Oversight Program

Enclosure

cc: Mr. Kris Larson
Ninyo & Moore
1956 Webster Street, Suite 400
Oakland, CA 94612

Donna Drogos, ACEH
Steven Plunkett, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



7

May 26, 2005

Gary A. Thompson
Thompson & Thompson Fence Co. 2584 Grant Ave.
San Lorenzo, CA 94580

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

**RE: Fuel Leak Case #RO00 [REDACTED] Thompson & Thompson, 2584 Grant Ave.,
San Lorenzo, CA**

Dear Mr. Thompson:

Alameda County Environmental Health, Local Oversight Program (LOP), has received and reviewed the files regarding the above referenced property. It has come to our attention that you have not submitted any quarterly monitoring report since August 30th, 1999. This is despite the fact that the last report indicated Benzene level at 1,900ppm, MTBE at 150ppb, and TPH-G at 13,000ppb in groundwater. Our office requests that you address the following technical comments when performing the proposed work and provide the technical report(s) requested below.

Technical Comments

- You are required to submit quarterly monitoring report as required unless otherwise directed by this office. The last report provided to this office was on August 30th, 1999 submitted by Mr. Michael Swaney of Chaney, Walton & McCall (LLC).
- In your report please provide explanation regarding the concentrations of the constituents in MW-2 since the groundwater flow gradient indicates and almost northerly direction (August 1999 report) while this well is upgradient from the former UST location. Please provide some explanation for the above scenario in the next quarterly groundwater monitoring report due immediately.

Technical Report Request

- Quarterly monitoring report by July 27th, 2005

Please contact me at (510) 567-6876 if you have any questions.

Sincerely,



Amir K. Gholami

Hazardous Materials Specialist

C: Michael W. Swaney, Chaney, Walton, McCall LLC, 35 Embarcadero Cove,
Oakland, CA 94606-5203
A.Gholami/D.Drogos, files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



STID 3191

September 20, 1999

Gary A. Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave.
San Lorenzo, CA 94580

ENVIRONMENTAL HEALTH SERVICES

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

RE: Required investigation at 2584 Grant Ave., San Lorenzo, CA

Dear Mr. Thompson:

I am in receipt of "Quarterly Monitoring Report, Shallow Groundwater Monitoring Wells" report dated August 30th, 1999 submitted by Mr. Michael Swaney of Chaney, Walton & McCall(LLC). Thank you for submittal of the report.

This report indicates that MW-1 well has presently the highest concentrations of the constituents including Benzene at 1,900ppb, and MTBE at 150ppb, and TPH-G at 13,000ppb in groundwater. However, there seems to be a decrease in the concentrations of the constituents in MW-1 and MW-2 wells since the last laboratory analysis made in 1/21/1999.

The groundwater flow gradient indicates and almost northerly direction. However, this does not explain the concentrations of constituents in MW-2, which is upgradient from the former UST location. Please provide some explanation for the above scenario in the next quarterly groundwater monitoring report due by November of 1999.

I will be looking forward for the next quarterly monitoring report.

If you have any questions and or concerns, please call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Michael W. Swaney, Chaney, Walton, McCall LLC,
35 Embarcadero Cove, Oakland, CA 94606-5203

Files

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)

STID 3191

May 20, 1999

Gary A. Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave.
San Lorenzo, CA 94580

RE: Required investigation at 2584 Grant Ave., San Lorenzo, CA

Dear Mr. Thompson:

This office is in receipt of your letter dated May 14, 1999. Thank you for clarifying the contact person, I understand that Mr. Argy Leyton of Leyton & Associates Environmental Consulting is no longer associated with the tank closure project and that Mr. Michael W. Swaney of Chaney, Walton & McCall LLC is your present contact and service project manager. Per your request, I will inform Mr. Swaney of the above change as well.

As requested previously, please provide a chronological table of laboratory results with the next quarterly groundwater monitoring report due in August 1999.

I will be looking forward for the next quarterly monitoring report.

If you have any question, Please do not hesitate to call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Michael W. Swaney, Chaney, Walton, McCall LLC,
35 Embarcadero Cove, Oakland, CA 94606-5203
Files

Thompson & Thompson Fence Co., Inc.

FAX # (415) 278-4024

DATE: 5/20/99

TIME: 1:00p.m.

ATTENTION: Amir Gholami

COMPANY: Env. Health Services

FROM: Thompson & Thompson Fence

THERE ARE 2 PAGES (INCLUDING THIS COVER LETTER). PLEASE CALL (415) 276-8350 IF ANY PAGES ARE MISSING.

Please give a copy of this letter
to Michael Swaney
Thank you!

P.O. Box 206, 2584 Grant Ave. San Lorenzo, California 94580 (415) 276-8350

Thompson & Thompson Fence Co., Inc.



3/19/1
RECEIVED
RESERVED

May 14, 1999

Amir K. Gholami, REHS
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Dear Mr. Gholami:

I am in receipt of your letter of May 3, 1999 and would like to inform you that Argy Leyton, Senior Project Manager, Leyton & Associates Environmental Consulting, 316 Lane, Oakley, CA 94561 is no longer associated with the tank closure project.

Michael W. Swaney, Chaney, Walton, McCall LLC, 35 Embarcadero Cove, Oakland, CA 94606-5203 is our point of contact and service project manager.

Thank you,

Gary A. Thompson

Gary A. Thompson
President

ENVIRONMENTAL
PROTECTION
99 MAY 19 AM 11:39

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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)

StId 3191

May 11, 1999

Gary Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave.
San Lorenzo, CA 94580

RE: Required investigation at 2584 Grant Ave., San Lorenzo, CA

Dear Mr. Thompson:

This office is in receipt of the report dated April 8th, 1999, along with the necessary items requested in my letter dated May 3rd, 1999. This document was submitted by Mr. William W. Swaney of Chaney, Walton & McCall LLC. Thank you for the submittal of the above report. As indicated earlier this report indicates overall compliance with the items requested in the letter dated March 25th, 1999, which includes surveying of the monitoring wells to an established benchmark, laboratory analysis for TPH-G, BTEX, MTBE, etc.

In addition, this report reveals the concentration of Benzene and MTBE as high as 1800ppb, and 300ppb in MW-1 and MW-2 respectively. The concentration of TPHg was noted as high as 24000ppb in MW-1. There were other chemical constituents found in the monitoring wells as well.

Please provide a chronological table of laboratory results with the next quarterly groundwater monitoring report due in August 1999.

I will be looking forward for the next quarterly monitoring report.

If you have any question, Please call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Argy Leyton, Senior Project Manager, Leyton & Associates
Environmental Consulting, 316 Cashew Lane, Oakley, CA 94561
Michael W. Swaney, Chaney, Walton, McCall LLC,
35 Embarcadero Cove, Oakland, CA 94606-5203
Files

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

StId 3191

May 3, 1999

Gary Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave.
San Lorenzo, CA 94580

RE: Required investigation at 2584 Grant Ave., San Lorenzo, CA

Dear Mr. Thompson:


I am in receipt of the report dated April 8, 1999 submitted by Mr. William W. Swaney of Chaney, Walton & McCall LLC. Thank you for the submittal of the above report. This report indicates overall compliance with the items requested in the letter dated March 25th, 1999, which includes surveying of the monitoring wells to an established benchmark, laboratory analysis for TPH-G, BTEX, MTBE, etc.

However, the report does not include the laboratory analysis results, chain of custody, the field data, etc. The indicated items were not included in the package submitted to this office, even though the report indicates otherwise.

Please submit the complete report along with the state-certified laboratory analysis to the office by 5/10/99.

If you have any question, Please call me at (510)-567-6876.

Sincerely,


Amir K. Gholami, REHS
Hazardous Materials Specialist

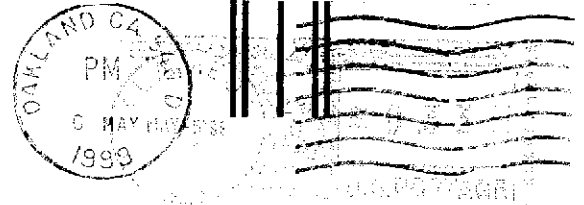
C: Argy Leyton, Senior Project Manager, Leyton & Associates
Environmental Consulting, 316 Cashew Lane, Oakley, CA 94561
Michael W. Swaney, Chaney, Walton, McCall LLC,
35 Embarcadero Cove, Oakland, CA 94606-5203
Files

cc 4580

ALAMEDA COUNTY

HEALTH CARE SERVICES AGENCY

Environmental Health Services
Environmental Protection
1131 Harbor Bay Parkway
Alameda, CA 94502-6577



Argy Leyton, Senior Project Manager
Leyton & Associates Environmental Consulting
316 Cashew
Oakley, CA.

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SAINT CHARLES MO 63304-2423

94502/6577



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



StId 3191

March 25, 1999

Gary Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave.
San Lorenzo, CA 94580

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

Notice of Violation

RE: Required investigation at 2584 Grant Ave., San Lorenzo, CA

Dear Mr. Thompson:

I sent you a letter on 23rd of November 1998 regarding the required investigation at the above referenced site. In that letter I indicated the need to follow up on the letter dated October 18, 1996 by Amy Leech formerly of this office. I also discussed the case with Mr. Dan Self on 1/13/99. I requested that you comply with this office's requirements regarding the above referenced site by 12/19/98. To this date this office has not received any responses and or plan of action from you.

The requirements stated in October 18, 1996, among others, included the following:

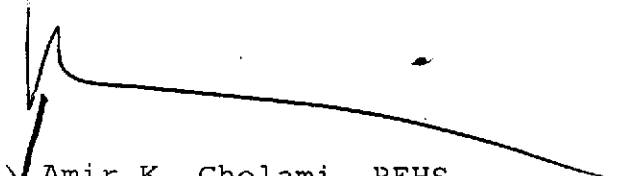
- Surveying of Monitoring wells to an established benchmark (mean sea level)
- Groundwater elevation and gradients must be determined on a monthly basis for one year and submitted along with the quarterly monitoring reports
- Laboratory analysis should include TPH-G, BTEX, and MTBE
- Quarterly Monitoring Reports must be submitted by the first day of the second month of each subsequent quarter and are required until the site can be qualified for closure

This is a formal request for soil and groundwater investigation pursuant to Section 2725(a) of Title 23 California Code of Regulations.

In addition, please be advised that Section 13267(b) of the California Water Code and Regional Water Quality Control Board (RWQCB) can impose up to \$1000.00 per day for each day of this violation. Failure to respond can result in referral of the case to the Alameda County District Attorney's Office for an enforcement action.

Please comply with the above issues by 4/25/98. If you have any question, call me at (510)-567-6876.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Argy Leyton, Senior Project Manager, Leyton & Associates
Environmental Consulting, 316 Cashew Lane, Oakley, CA 94561
Files

StId 3191

November 23, 1998

Gary Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave
San Lorenzo, CA 94580

Subject: 2584 Grant Ave, San Lorenzo, CA

Dear Mr. Thompson:

I will be handling the clean up issues regarding the above site since Amy Leech no longer works with us. After reviewing the files, it has come to my attention that Amy Leech had requested several items in her letter dated October 18, 1996 addressed to you. The items she requested have not yet been complied with. This among others includes quarterly monitoring (which none exists since the report dated 3/28/97), proper surveying of the well to an established benchmark (MSL), monthly ground water measurements, and proper delineation of ground water contamination.

Please comply with the above issues by 12/19/98. If you have any question, call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: files

StId 3191

November 19, 1998

Gary Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave
San Lorenzo, CA 94580

Subject: 2584 Grant Ave, San Lorenzo, CA

Dear Mr. Thompson:

I will be handling the clean up issues regarding the above site since Amy Leech no longer works with us. After reviewing the files, it has come to my attention that Amy Leech had requested several items in her letter dated October 18, 1996 addressed to you. The items she requested have not yet been complied with. This among others includes quarterly monitoring (which none exists since the report dated 3/28/97), proper surveying of the well to an established benchmark (MSL), monthly ground water measurements, and proper delineation of ground water contamination.

Please comply with the above issues by 12/19/98. If you have any question, call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Post-It™ brand fax transmittal memo 7671 # of pages ▶ 35

To C/O MIRA	From Amy Leach
Co. Gary Thompson	Co.
Thompson Fence	Phone # 567-6255
Fax # 278-4024	Fax #

Std 3191

October 18, 1996

Gary Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave
San Lorenzo CA 94580

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

Subject: 2584 Grant Avenue, San Lorenzo, CA

Dear Mr. Thompson:

Per your request this office has reviewed Leyton & Associates' *Risk Assessment Report*, dated September 1996, and the Polymatrix Associates' *Quarterly Self-Monitoring Report*, dated October 8, 1996, for the subject site. As you are aware, an investigation of soil and groundwater has been required at this site in response to a confirmed release of petroleum hydrocarbons from a former 1,000-gallon gasoline underground storage tank (UST) that was removed from the site in November 1992.

Three groundwater monitoring wells were installed at this site in the May 1996 to access the impact of gasoline contamination to groundwater beneath the site. Because limited groundwater data is available for this site and the groundwater contaminant plume is not defined south of the former UST pit, this office requested you to complete further groundwater monitoring investigations (one to two more quarters) before requiring further investigations (see August 12, 1996 letter attached). However, it is our understanding that a risk assessment of the property was recently completed by Leyton & Associates (Leyton) as a condition for refinancing a loan.

The Leyton risk assessment found that there is no significant risk (excess lifetime cancer risk (ELCR) = 3.5×10^{-6}) to human health from exposure to dissolved benzene in groundwater from vapor intrusion into buildings at this site for the current land-use and site configuration. The ELCR from this report was based on a calculated maximum benzene concentration for the site of 1,800 ppb benzene in groundwater.

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510 337 9335
ALAMEDA CO EHS HAZ-OPS

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
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7499402045

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Post-It™ brand fax transmittal memo 7671		# of pages > 35
To Alameda	From Army Leach	
Co. Gary Thompson	Co.	
Thompson Fence	Phone #	567-6255
Fax #	Fax #	278-4024

Std 3191

October 18, 1996

Gary Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave
San Lorenzo CA 94580

Subject: 2584 Grant Avenue, San Lorenzo, CA

Dear Mr. Thompson:

Per your request this office has reviewed Leyton & Associates' *Risk Assessment Report*, dated September 1996, and the Polymatrix Associates' *Quarterly Self-Monitoring Report*, dated October 8, 1996, for the subject site. As you are aware, an investigation of soil and groundwater has been required at this site in response to a confirmed release of petroleum hydrocarbons from a former 1,000-gallon gasoline underground storage tank (UST) that was removed from the site in November 1992.

Three groundwater monitoring wells were installed at this site in the May 1996 to access the impact of gasoline contamination to groundwater beneath the site. Because limited groundwater data is available for this site and the groundwater contaminant plume is not defined south of the former UST pit, this office requested you to complete further groundwater monitoring investigations (one to two more quarters) before requiring further investigations (see August 12, 1996 letter attached). However, it is our understanding that a risk assessment of the property was recently completed by Leyton & Associates (Leyton) as a condition for refinancing a loan.

The Leyton risk assessment found that there is no significant risk (excess lifetime cancer risk (ELCR) = 3.5×10^{-5}) to human health from exposure to dissolved benzene in groundwater from vapor intrusion into buildings at this site for the current land-use and site configuration. The ELCR from this report was based on a calculated maximum benzene concentration for the site of 1,800 ppb benzene in groundwater.

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(510) 567-6700
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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



StId 3191

October 18, 1996

Gary Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave
San Lorenzo CA 94580

Subject: 2584 Grant Avenue, San Lorenzo, CA

Dear Mr. Thompson:

Per your request this office has reviewed Leyton & Associates' *Risk Assessment Report*, dated September 1996, and the Polymatrix Associates' *Quarterly Self-Monitoring Report*, dated October 8, 1996, for the subject site. As you are aware, an investigation of soil and groundwater has been required at this site in response to a confirmed release of petroleum hydrocarbons from a former 1,000-gallon gasoline underground storage tank (UST) that was removed from the site in November 1992.

Three groundwater monitoring wells were installed at this site in the May 1996 to access the impact of gasoline contamination to groundwater beneath the site. Because limited groundwater data is available for this site and the groundwater contaminant plume is not defined south of the former UST pit, this office requested you to complete further groundwater monitoring investigations (one to two more quarters) before requiring further investigations (see August 12, 1996 letter attached). However, it is our understanding that a risk assessment of the property was recently completed by Leyton & Associates (Leyton) as a condition for refinancing a loan.

The Leyton risk assessment found that there is no significant risk (excess lifetime cancer risk (ELCR) = 3.5×10^{-5}) to human health from exposure to dissolved benzene in groundwater from vapor intrusion into buildings at this site for the current land-use and site configuration. The ELCR from this report was based on a calculated maximum benzene concentration for the site of 1,800 ppb benzene in groundwater.

This office has the following comments concerning the risk assessment:

- The soil contamination volatilization to outdoor air exposure pathway was not assessed. Since benzene concentrations of up to 38 ppm were identified in soil in the vicinity of the former UST pit and this value exceeds the ASTM ES 1739-95 Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites (RBCA) Tier 1 Risk-Based Screening Level (RBSL) example look-up table, this pathway should be evaluated as part of the site-specific risk assessment.
- Some default values were used in the risk assessment instead of incorporating site-specific values in the calculations (e.g. site-specific building foundation parameters). These default

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ENVIRONMENTAL PROTECTION (LOP)
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FAX (510) 337-9335

Thompson
Re: 2584 Grant Ave
October 18, 1996
Page 2 of 3

values may or may not be more conservative for the current building structure on the site; therefore, site-specific parameters should be used or a rationale for using default values versus site-specific parameters should be discussed.

- The Leyton risk assessment was based on preliminary groundwater results which are not necessarily representative of the maximum concentrations of benzene in groundwater at the site. Benzene concentrations increased up to 4,700 ppb during the last quarterly sampling event in October 1996. This data indicates that there is not yet sufficient data to establish the maximum concentration of benzene in groundwater at the site. Therefore, the risk calculation will need to be re-calculated once enough historical groundwater data has been accumulated.

Therefore, at this time, it is best to adhere to the requirements as stated in our August 12, 1996 letter:

1. Monitoring wells must be surveyed to an established benchmark (i.e. mean sea level) with an accuracy of 0.01 foot. A confirmation that this survey has been completed is **due to this office no later than November 1, 1996.**
2. Groundwater elevations and corresponding gradient determinations are to be conducted on a monthly basis for 12 consecutive months and reported to this office as part of the required quarterly reporting.
3. In addition to monthly groundwater measurements, the monitoring wells are to be sampled and analyzed for TPH-G, BTEX, and MTBE on a quarterly basis until this site qualifies for closure.
4. Quarterly Monitoring Reports are due to this office until this site qualifies for final RWQCB "sign-off". Such **quarterly reports are due the first day of the second month of each subsequent quarter.** Quarterly reports must describe the status of the investigation and must include, among others, the following elements:
 - o Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
 - o Status of ground water contamination characterization.
 - o Interpretations of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, historical summary of groundwater measurements and analytical results, etc.

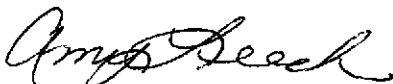
Thompson
Re: 2584 Grant Ave
October 18, 1996
Page 3 of 3

- o Recommendations or plans for additional investigative work or remediation.
5. **Based on results of the preliminary site assessment completed in May 1996 and most recent groundwater data collected in October 1996, it ~~appears that the extent of groundwater~~ contamination has *not* been defined at this site.** Additional rounds of quarterly monitoring data and monthly gradient determinations should be collected to assist in determining the extent and severity of ground water contamination (at minimum, data from one hydrologic cycle may be necessary). After this data is collected, it may be necessary to conduct additional investigations to further delineate the extent of groundwater contamination and/or to submit a revision/addendum on the evaluation of risk to human health and the environment associated with the potential exposures to gasoline contaminated soil and groundwater at this site. The revision/addendum to the risk assessment should address the above mentioned deficiencies.

In addition, although soil contamination at this site identified during UST removal activities appears to be limited in extent, it may still be a significant source of contamination to groundwater. A viable option to consider when assessing this site for further investigations would be to remove the contaminated soil in the vicinity of the former UST pit. This option would address the source removal requirement for the definition of a "Low Risk Groundwater Case" as described in the San Francisco Bay Regional Water Quality Control Boards's *Interim Guidance on Required Cleanup at Low Risk Fuel Sites*, dated December 8, 1995. The feasibility, risks, and cost-benefit of overexcavation of this soil should be compared to other corrective action options, such as costs for further risk assessment or long-term monitoring to confirm natural attenuation.

Please contact me at 510-567-6755 if you have questions or need additional information.

Sincerely,



Amy Leech
Hazardous Materials Specialist

ATTACHMENT

c: Argy Leyton, Leyton & Associates, 316 Cashew Lane, Oakley, CA 94561 w/attachments
Dick Holdstock fax # (916)753-7921
Gordon Coleman - File(ALL)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Alameda County CC4580
Environmental Health Services
1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
(510)567-6700 FAX(510)337-9335

StId 3191

August 12, 1996

Gary Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave
San Lorenzo CA 94580

Subject: Investigations at 2584 Grant Avenue, San Lorenzo, CA

Dear Mr. Thompson:

This office has reviewed Leyton & Associates' Preliminary Site Assessment Report, dated May 31, 1996, for the subject site. Three monitoring wells (MW-1, MW-2, and MW-3) were installed during this investigation. Soil and groundwater samples were collected from each monitoring well/boring location. Elevated levels of Total Petroleum Hydrocarbons as Gasoline (TPH-G) and benzene, toluene, ethylbenzene, and xylenes (BTEX) were identified in groundwater samples collected from monitoring wells MW-1 and MW-2.

You are directed to begin quarterly monitoring of all on-site monitoring wells. Ground water elevations and corresponding gradient determinations are to be conducted monthly for 12 consecutive months and then quarterly thereafter until this site qualifies for closure. Gradient maps for each event are to be presented in commensurate quarterly reports. Please be reminded that all monitoring wells are to be surveyed to an established bench mark (i.e. mean sea level), with an accuracy of 0.01 foot. A report of each quarterly monitoring event is due to this office the first day of the second month of each subsequent quarter until this site qualifies for final RWQCB "sign-off". **The next quarterly report is due to this office no later that September 30, 1996.**

Based on the results of the initial ground water samples, it appears that the extent of groundwater contamination has *not* been defined at this site. One or two additional rounds of quarterly monitoring data and monthly gradient determinations should be collected to assist in determining the extent and severity of ground water contamination. After this data is collected, you may be directed to submit a work plan to this office proposing to further delineate the extent of groundwater contamination and/or submit an evaluation of risk to human health and the environment associated with the potential exposures to gasoline contaminated soil and groundwater at this site. The ASTM ES 1739-95 Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites (RBCA) can be used to assist in completing this type of evaluation. For more information, please see the attached interim guidance document issued by the San Francisco Bay Area Regional Water Quality Control Board's (RWQCB) issued on January 5, 1996 regarding required cleanup at underground storage tank fuel sites.

As indicated in our February 26, 1996 letter (see attached), the petroleum contaminated soil stockpiled at your site must be adequately characterized before it is reused or disposed of off-site. You are

Thompson
Re: 2584 Grant Ave
August 12, 1996
Page 2 of 2

required to submit manifests for the off-site disposal or analytical results of this soil no later than September 30, 1996.

Please contact me at 510-567-6755 if you have questions or need additional information.

Sincerely,



Amy Leech
Hazardous Materials Specialist

ATTACHMENTS (2)

c: Argy Leyton, Leyton & Associates, 316 Cashew Lane, Oakley, CA 94561 w/attachments
Gordon Coleman - File(ALL)

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 checked="" type="checkbox"/> NO		FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I HAVE DISTRIBUTED THIS INFORMATION ACCORDING TO THE DISTRIBUTION SHOWN ON THE INSTRUCTION SHEET ON THE BACK PAGE OF THIS FORM.		
REPORT DATE 06/14/96		CASE #		SIGNED: <i>[Signature]</i> DATE: 06/14/96		
REPORTED BY	NAME OF INDIVIDUAL FILING REPORT ARGY LEYTON		PHONE 510 625-6909		SIGNATURE <i>[Signature]</i>	
	REPRESENTING <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OTHER		COMPANY OR AGENCY NAME LEYTON + ASSOCIATES			
	ADDRESS 316 CASHEN LN STREET OAKLEY CITY CA STATE 94561 ZIP					
RESPONSIBLE PARTY	NAME THOMPSON + THOMPSON FENCE		CONTACT PERSON GARY THOMPSON		PHONE 510 276-8350	
	ADDRESS 2584 GRANT AVE STREET SAN LORENZO CITY CA STATE 94580 ZIP					
SITE LOCATION	FACILITY NAME (IF APPLICABLE) THOMPSON + THOMPSON FENCE CO		OPERATOR GARY THOMPSON		PHONE 510 276-8350	
	ADDRESS 2584 GRANT AVE STREET SAN LORENZO CITY ALAMEDA COUNTY 94580 ZIP CROSS STREET HESPERIAN BLVD.					
IMPLEMENTING AGENCIES	LOCAL AGENCY ALAMEDA COUNTY - ENV. HEALTH		AGENCY NAME S.F. BAY		CONTACT PERSON AMY LEECH	
	PHONE 510 567-6755					
SUBSTANCES INVOLVED	(1) NAME LEADED GASOLINE		QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN			
	(2) <input type="checkbox"/> UNKNOWN					
DISCOVERY/ABATEMENT	DATE DISCOVERED 1/1/06 9/2		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 checked="" type="checkbox"/> CLOSE TANK & REMOVE <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> CLOSE TANK & FILL IN PLACE <input type="checkbox"/> CHANGE PROCEDURE <input type="checkbox"/> REPLACE TANK <input type="checkbox"/> OTHER			
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE 1/1/06 9/2					
SOURCE/ CAUSE	SOURCE OF DISCHARGE <input type="checkbox"/> TANK LEAK <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER		CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL <input type="checkbox"/> CORROSION <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER			
	CHECK ONE ONLY <input type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input checked="" type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)					
CURRENT STATUS	CHECK ONE ONLY <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED <input type="checkbox"/> POLLUTION CHARACTERIZATION <input type="checkbox"/> LEAK BEING CONFIRMED <input checked="" type="checkbox"/> PRELIMINARY SITE ASSESSMENT UNDERWAY <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> REMEDIATION PLAN <input type="checkbox"/> CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> CLEANUP UNDERWAY					
	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"/> VACUUM EXTRACT (VE) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> VENT SOIL (VS) <input type="checkbox"/> OTHER (OT)					
COMMENTS	COMMENTS					

white -env.health
 yellow -facility
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH
 Hazardous Materials Inspection Form

1131 Harbor Bay Pkwy.
 Suite 250
 Alameda, CA 94502-6577
 (510) 567-6700

II, III

Site ID # 391 Site Name Thompson & Thompson Today's Date 03/07/96

II.A BUSINESS PLANS (Title 19)

- ___ 1. Immediate Reporting 2703
- ___ 2. Bus. Plan Stds. 25503(b)
- ___ 3. RR Cars > 30 days 25603.7
- ___ 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)

Site Address 2584 Grant Ave.
 City San Lorenzo Zip 94 Phone _____

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. OnSite Conseq. Assess. 25524(c)
- ___ 15. Probable Risk Assessment 25534(d)
- ___ 16. Persons Responsible 25534(g)
- ___ 17. Certification 25534(f)
- ___ 18. Exemption Request? (Y/N) _____
- ___ 19. Trade Secret Requested? 25538

___ 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 LOP - Field Notes

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

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 Gndwater
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 | ___ 7. Precs Tank Test 2643 |
| | Date: _____ |
| | ___ 8. Inventory Rec. 2644 |
| | ___ 9. Soil Testing 2646 |
| ___ 10. Ground Water. 2647 | |
| ___ 11. Monitor Plan 2632 | |
| ___ 12. Access. Secure 2634 | |
| ___ 13. Plans Submit 2711 | |
| Date: _____ | |
| ___ 14. As Built 2635 | |
| Date: _____ | |

Comments:

On-site to survey soil & groundwater investigations.
Per Consultant Grayteyton, 3 permanent monitoring wells will be installed instead of the 3 Temp. wells. Well locations are planned per revised w/p Figure 2 (2/96).
At ~~the~~ MW-2 was installed at time of inspection. Per ms deyton there were strong H2S odors due to presence of diff muds; boring down to 20' (screened 4-19'); water was slow to recharge. A-water sample well was collected later after well development.
Returned to site during drilling of MW-1 (TW-1) which was located approx. 10' south from tank pit. Strong hydrocarbon odor & H2S detected.

Rev 6/88

Contact: _____

Title: _____

Signature: _____

Inspector: A. Dech

Signature: _____

II, III



Stfd 3191

February 26, 1996

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502
(510) 567-6700

Gary Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave
San Lorenzo CA 94580

Subject: Workplan for investigations at 2584 Grant Avenue, San Lorenzo, CA

Dear Mr. Thompson:

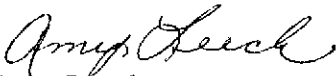
This office has reviewed Leyton & Associates' work plan, dated February 16, 1996. This work plan proposes to install three groundwater monitoring wells in the vicinity of the former underground storage tank (UST) pit at the subject site. This work plan is acceptable to this office with the following comments/additions:

- In order to more accurately assess the health and safety risks, if any, in the area of the office and shop areas, we recommend relocating two of the proposed monitoring wells west of the underground storage tank (UST) pit. Per my telephone conversation with Ms. Leyton on February 26, 1996, one of the proposed monitoring wells (TW-1) could be located northwest from the northern end of the former tank pit and another monitoring well (TW-2) could be located southwest from the southern end of the former tank pit. Please submit an addendum to Figure 2 of the work plan that indicates these new sample locations.
- The three monitoring wells should be sufficiently separated in order to produce meaningful site-specific gradient determinations. Please be aware that should there be a need to convert the temporary wells to permanent monitoring wells, then these wells must be surveyed to an established benchmark (i.e., mean sea level) with an accuracy of 0.01 foot.
- As stated in the work plan, based on the soil and groundwater sample results of this investigation, there may be a need to convert the three temporary monitoring wells to permanent monitoring wells. Monitoring well completion would include the installation of approved sanitary seals and security vaults with locks.
- Per our records and my conversation with Ms. Leyton, there is approximately 60 cubic yards of petroleum contaminated soil at your site which has been stockpiled since the 1992 tank removal. You are required to either dispose of this soil at a certified disposal facility, or if you plan to reuse it on site, you are required to re-sample this soil in order to determine if it is suitable for on-site reuse. Please include the sample results or manifests for disposal for this soil in the report documenting the soil and groundwater investigations. A discrete sample must be analyzed for every 20 cubic yards for reuse of soil on site, and a composite sample for every 50 cubic yards is required for off-site disposal.

Thompson
Re: 2584 Grant Ave.
February 26, 1996
Page 2 of 2

Please notify this office at least 72 hours before field work begins. Field work should commence within the next 30 days. A report must be submitted within 45 days after the completion of this phase of work at the site. If you have questions, please call me at (510)567-6755.

Sincerely,



Amy Leech
Hazardous Materials Specialist

ATTACHMENT

AB
c: Leyton & Associates, 316 Cashew Ln, Oakley, CA 94561
Gordon Coleman-File(ALL)

LEYTON & ASSOCIATES
Environmental Consulting

RECEIVED
98 FEB 22 PM 3:45

February 19, 1996


Mr. Gary Thompson
Thompson & Thompson Fence Company
2584 Grant Avenue
San Lorenzo, California 94580

Dear Mr. Thompson:

Leyton & Associates is pleased to present the enclosed Preliminary Site Assessment Workplan. Upon approval of the workplan by Alameda County Environmental Health Services, L&A is prepared to commence with the work.

Thank you for allowing L&A to provide environmental consulting services to you. Please call should you have any questions or comments.

Sincerely,


Argy Leyton
Senior Project Manager

cc: Ms. Amy Leech - Alameda County Environmental Health Services

316 Cashew Lane - Oakley, California - 94561 - (510) 625-6909

ALAMEDA COUNTY ENVIRONMENTAL
HEALTH DEPARTMENT

ENVIRONMENTAL PROTECTION DIVISION
1131 Harbor Bay Parkway, Suite #250
Alameda, CA 94502-6577
Telephone (510) 567-6700
Fax Number (510) 337-9335

FAX COVER SHEET

DATE: Nov. 13, 1995
TO: Gary Thompson c/o Frank Bloss
Thompson & Thompson Dental Co.
2584 Grant Ave San Lorenzo CA
FAX # (510) 278-4024

Total number of pages including cover sheet 7

FROM: Amy Leach
(510) 567-6755

NOTE:

Per your request, please find attached
the Sept 21, 1995 letter w/attachments
to Gary Thompson re 2584 Grant Ave.
San Lorenzo. I look forward to hearing
from you soon. Sincerely, Amy Leach

(SMILE) have a nice day.
DO SOMETHING FOR OUR ENVIRONMENT.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

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

Std 3191

September 21, 1995

Gary Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave
San Lorenzo CA 94580

Subject: Required investigations at 2584 Grant Avenue, San Lorenzo, CA

Dear Mr. Thompson:

Per our telephone conversation on September 20 1995, this office has reviewed reports and correspondence regarding the November 1992 removal of a 1,000-gallon gasoline underground storage tank (UST) at the subject site. Total Petroleum Hydrocarbons as gasoline (TPHg) and benzene, toluene, ethylbenzene, and xylenes (BTEX) were detected up to 2,000 parts per million (ppm), 38 ppm, 120 ppm, 36 ppm, and 190 ppm, respectively, in soil samples collected from the tank pit in November 1992. Based on this information this office requested that you submit a work plan for a Preliminary Site Assessment for further soil and groundwater investigations at this site by June 1994 and recommended that you contact the State UST Cleanup Fund for financial assistance (see attached letter for requirements dated March 21, 1994).

During our recent telephone conversation, you indicated that you had not applied with the State UST Cleanup Fund or pursued further soil and groundwater investigations at your site. You, also, indicated that contaminated soil excavated during the UST removal is currently stockpiled at your site. As we discussed, **a work plan for further soil and groundwater investigations at this site must be submitted to this office within 45 days of the date of this letter.** Please refer to the attached March 21, 1994 letter for specific Preliminary Site Assessment requirements.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the San Francisco Bay Regional Water Quality Control Board.

Attached are phone numbers for and information regarding the State UST Cleanup Fund. This office encourages you to apply with the Cleanup Fund as soon as possible. In addition, **please complete and return the attached "Underground Storage Tank Unauthorized Release (Leak)/Contamination Site Report" to this office by October 6, 1995.** If you have already filed this report with the State Water Resources Control Board, please forward a copy of that report to this office.

Thompson
Re: 2584 Grant Ave.
September 21, 1995
Page 2 of 2

Please contact me at 510-567-6755 if you have questions or need additional information. I look forward to receiving the work plan for further soil and groundwater investigation at your site by November 6, 1995.

Sincerely,



Amy Leech
Hazardous Materials Specialist

ATTACHMENTS

c: Gil Jensen, Alameda County District Attorney's Office
Acting Chief of Environmental Protection - **File(ALL)**

Thompson & Thompson
PO Box 206
San Lorenzo Ca 94580

4-10-94

State Water Resources Control Board
Division of Clean Water Programs
UST Cleanup Fund
PO Box 944212
Sacramento Ca

ALCO
HAZMAT
94 APR 19 AM 10:40

Attention Blessy Torres

Ms. Torres

The Alameda County Health Care Services Agency has demanded that I conduct a soil and ground water investigation at 2584 Grant Ave, San Lorenzo Ca.

This site is currently the location where I conduct my contracting business. On Nov 6 1992 we had a 1000 gallon storage tank removed. Since that time my business has suffered catastrophic financial difficulties and has left me unable to contract with a company to perform the aforementioned work.

I have been informed by letter and verbally by the County authorities that a Federal Trust Fund has been established to assist individuals such as myself with this matter.

I am requesting that you forward to me the appropriate application forms and instructions so I may avail myself of these services.

Sincerely
Gary G. Thompson

510-276-8250

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 4, 1994

Mr. Gary Thompson
Thompson & Thompson
Fence Co., Inc.
2584 Grant Ave.
San Lorenzo, CA 94580-0206

STID 3191

Re: Investigations at 2584 Grant Ave., San Lorenzo, California

Dear Mr. Thompson,

Per our meeting on March 31, 1994, you stated that, due to financial difficulties, you are currently unable to conduct the required soil and ground water investigations at the above site. It is the understanding of this office that you will apply for the State Trust Fund and submit it to the State Clean Water Program within the next month. This office will extend the deadline for the required investigations, given in the County's March 21, 1994 letter, until the State determines your site's eligibility and ranking. Subsequent to obtaining this information, you will be required to submit a timeline for site investigations and remediation.

In the meantime, you are required to keep this office posted as to the progress of the Cleanup Fund application. If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Juliet Shin', written over a horizontal line.

Juliet Shin
Hazardous Materials Specialist

cc: Edgar Howell-File(JS)

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

March 21, 1994

Mr. Gary A. Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave.
San Lorenzo, CA 94580

STID 3191

Re: Required investigations at 2584 Grant Ave., San Lorenzo,
California

Dear Mr. Thompson,

On November 6, 1992, one 1,000-gallon leaded gasoline underground storage tank (UST) was removed from the site. Soil samples collected from beneath this UST identified up to 2,000 parts per million (ppm) Total Petroleum Hydrocarbons as gasoline (TPHg) and 38 ppm benzene.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that soil and ground water investigations be conducted when there is evidence to indicate that a release from an UST will impact or may have impacted the ground water.

You are required to conduct a **Preliminary Site Assessment (PSA)** to determine the lateral and vertical extent and severity of **both soil and ground water** contamination resulting from the release at the site. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, and be consistent with requirements set forth in Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached **Appendix A**. The major elements of the guidelines include, but are not limited to, the following:

- o At least one ground water monitoring well must be installed within 10 feet of the observed soil contamination, oriented in the confirmed downgradient direction relative to ground water flow. In the absence of neighboring monitoring wells located within 100 feet of the site, or any other data identifying the confirmed downgradient direction, a minimum of three wells will be required to verify gradient direction. It appears that, in the case of this site, the

Mr. Gary A. Thompson
Re: 2584 Grant Ave.
March 21, 1994
Page 2 of 4

nearest UST site with monitoring wells is over 1,000 feet away. Therefore, **three monitoring wells must be installed at the site in order to characterize the ground water gradient flow.** During the installation of these wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology.

- o Subsequent to the installation of the monitoring wells, these wells must be surveyed to an established benchmark, (i.e., Mean Sea Level) with an accuracy of 0.01 foot. Ground water samples are to be collected and analyzed quarterly, and water level measurements are to be collected **monthly for the first three months**, and then quarterly thereafter. If the initial ground water elevation contours indicate that ground water flow directions vary greatly than you will be required to continue monthly water level measurements until the ground water gradient behavior is known. **Both soil and ground water samples must be analyzed for TPHg and benzene, toluene, ethylbenzene, xylenes, and lead.**

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. The RWQCB may choose to take over as lead agency if it is determined, following the completion of the initial assessment, that there has been a substantial impact to ground water.

In order to properly conduct a site investigation, you are required to obtain professional services of a reputable environmental consultant. **All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.**

The PSA proposal is due within 60 days of the date of this letter. Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site

Mr. Gary A. Thompson
Re: 2584 Grant Ave.
March 21, 1994
Page 3 of 4

qualifies for final RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter.

The referenced initial and quarterly reports must describe the status of the investigation and must include, among others, the following elements:

- o Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of ground water contamination characterization.
- o Interpretations of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations or plans for additional investigative work or remediation.

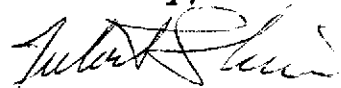
Please be advised that this is a formal request for a work plan pursuant to **Section 2722 (c)(d) of Title 23 California Code of Regulations**. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

Lastly, it is the understanding of this office that the excavated soil from the tank removal is still stockpiled on your site. You are required to either dispose of this soil at a certified disposal facility, or if you have plans to reuse this soil on site, you are required to resample this soil to determine whether or not the concentrations are acceptable for reuse.

If you have any questions or comments, please contact me at (510) 271-4530.

Mr. Gary A. Thompson
Re: 2584 Grant Ave.
March 21, 1994
Page 4 of 4

Sincerely,



Juliet Shin
Hazardous Materials Specialist

cc: Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

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

January 27, 1994

ATTN: Gary Thompson

Thompson & Thompson Fence
P O Box 206
San Lorenzo CA 94580

RE: Project # 6007A - R
at 2584 Grant Ave. in San Lorenzo 94580

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$253.50, payable to Alameda County.

Please write your project number and site address on your check.

We must receive this deposit before we perform any further work on this project. At the completion of this project, any unused monies will be refunded to you or your designee.

If you have any questions, please contact PAM EVANS
at (510) 271-4320.

Sincerely,

Edgar B Howell III, Chief
Hazardous Materials Division

c: files/inspector

R

2/1/94
Rob P/S
Be sure this
is paid immediately
File
File in this
removal file

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

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

October 20, 1993

Gary A. Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave.
San Lorenzo CA 94580

FINAL NOTICE OF VIOLATION

RE: Soil Sampling Results from Tank Removal

Dear Mr. Thompson:

On November 6, 1992 an underground leaded gasoline storage tank was removed from your property. To date, this office has not received the following required information and documents:

- ✓ 1. Laboratory analysis results of soil samples collected from the tank pit and from excavated soils. Laboratory generated analysis results, accompanied by chain-of-custody records and sampler's field notes, are required.
- ✓ 2. Copies of Hazardous Waste Manifests for tanks, piping, tank rinsates and soil hauled as hazardous waste. A copy of the form signed by disposal facility staff is required.

Information regarding disposition of excavated soil. Please provide information as to whether excavated soils were hauled away or left on site. If soils were hauled away, provide documentation establishing the disposal site.

Section 13267 (b) of the California Water Code requires that the above information be submitted. **Please provide the requested information by November 3, 1993.** You may contact me with any questions at (510)271-4320.

Sincerely,

A handwritten signature in cursive script that reads "Pamela J. Evans".

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney's Office
Richard Hiatt, Regional Water Quality Control Board

*No info provided
in Nov. 1993 report
on item 3. PE*

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

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

October 20, 1993

Gary A. Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave.
San Lorenzo CA 94580

copy

FINAL NOTICE OF VIOLATION

RE: Soil Sampling Results from Tank Removal

Dear Mr. Thompson:

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Section 13267 (b) of the California Water Code requires that the above information be submitted. **Please provide the requested information by November 3, 1993.** You may contact me with any questions at (510)271-4320.

Sincerely,

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney's Office

Richard Hiett, RWACB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

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

June 30, 1993

Gary A. Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave.
San Lorenzo CA 94580

NOTICE OF VIOLATION

RE: Soil Sampling Results from Tank Removal

Dear Mr. Thompson:

On November 6, 1992 an underground leaded gasoline storage tank was removed from your property. To date, this office has not received the following required information and documents:

1. Laboratory analysis results of soil samples collected from the tank pit and from excavated soils. Laboratory generated analysis results, accompanied by chain-of-custody records and sampler's field notes, are required.
2. Copies of Hazardous Waste Manifests for tanks, piping, tank rinsates and soil hauled as hazardous waste. A copy of the form signed by disposal facility staff is required.
3. Information regarding disposition of excavated soil. Please provide information as to whether excavated soils were hauled away or left on site. If soils were hauled away, provide documentation establishing the disposal site.

Section 2672 of Title 23, California Code of Regulations requires that the above information be submitted to this office. Please provide the requested information by July 15, 1993. You may contact me with any questions at (510)271-4320.

Sincerely,

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney's Office
James Ferdinand, Alameda County Fire Department

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

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

March 8, 1993

Gary A. Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave.
San Lorenzo CA 94580

RE: Soil Sampling Analysis Results from Tank Removal

Dear Mr. Thompson:

On November 6, 1992, an underground leaded gasoline storage tank was removed from your property. To date, this office has not received the following information and documents:

1. **Laboratory analysis results** of soil samples collected from the tank pit and excavated soils: Laboratory generated analysis results, accompanied by chain-of-custody records and sampler's field notes, are required.
2. **Copies of Hazardous Waste Manifests** for tanks, piping, tank rinsates and any soil hauled as hazardous waste: A copy of the form signed by disposal facility staff is required.
3. **Information regarding disposition of excavated soil:** Please provide information as to whether excavated soils were hauled away or left on site. If soils were hauled away, provide documentation establishing the disposal site.

The underground tank closure plan requires that the above information be submitted to this office within 60 days of the date of tank removal. **Please provide the information and documents listed above by March 22, 1993.** You may contact me with any questions at 271-4320.

Sincerely,

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Michael O'Connor, Alameda County District Attorney's Office
James Ferdinand, Eden-Castro Valley Fire District
Hagop Kevork, Kaprealian Engineering, Inc.

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

Site ID # _____ Site Name Tompson + Thompson Today's Date 11/6/92

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)

Site Address 2584 Grant Ave

City San Leandro 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

II.B ACUTELY HAZ MATS

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

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

Comments:

Tank Removal with  Fill Area
 NWSR

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/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 _____

- ___ 7. Precip 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

1- 1,000 GALLON ~~Gasoline~~ ^{Tank}, TPH 6, BTEX + TLCL Pb

THE ODOR OF GASOLINE WAS EVIDENT COMING FROM THE PIT AND ON THE UST. Tank is a steel-clad w/ TAR WVP. THE TAR WVP peels off the bottom of the tank like soft pudding. THE ODOR OF GASOLINE WAS HEAVY. Readings off the tank taken from the PID were over 1000 ppm. FIVE Fill Adhering to the tanks shows signs of Heavy Petroleum Contamination. No Apparent Holes.

Handwritten: H&H 308921 exp. 1/93

Samples: A-1- Depth 8.5 ft. PID Reading 5 up to 1800 ppm.

A-2- Depth 8.5 ft. PID Reading 600 ppm

Any odor of Gasoline coming off samples

(Cover all excavated soil)

II, III

Contact: DALE BYERS
 Title: FORM AN (ACADISO)
 Signature: [Signature]

Inspector: Jeff Shapiro
 Signature: [Signature]



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

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

August 3, 1992

Gary A. Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave.
San Lorenzo CA 94580

Dear Mr. Thompson:

As you are aware from past Notices from this office, Thompson and Thompson has been in violation of Section 25298 of the Health and Safety Code of California for at least 1 1/2 years. This Section requires that unused underground fuel storage tanks be monitored or removed. A removal plan was reviewed and accepted by this office over one year ago. To date, the tank has neither been removed nor monitored.

In my last Notice, you were instructed to submit documentation of tank monitoring or removal activities by July 22, 1992. Paradiso Construction Co.'s letter of July 31, 1992 was the first formal response to this deadline. Based on my recent conversations with Deanna Harding of Paradiso, it is my understanding that the first week of November, is the earliest date that Paradiso Construction Co. can remove the tank at your site.

Thompson & Thompson is required to notify this office in writing of the date by which the tank will be removed. In no case is the tank to remain onsite past November 6, 1992. You must also supply this office with completed tank permit application forms (blanks enclosed). Please submit your timetable and completed permit forms by August 15, 1992.

While I understand that tank removal scheduling must be coordinated with the contractor, November 6, 1992 is a deadline that must not be exceeded. Should you fail to remove the tank by that date, this matter will be immediately referred to the Alameda County District Attorney's Office for further enforcement action. You may contact me with any questions at 271-4320.

Sincerely,

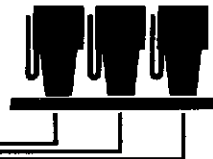
Pamela J. Evans
Senior Hazardous Materials Specialist

Enclosure

c: Mark Thomson, Alameda County District Attorney's Office
Richard Hiett, Regional Water Quality Control Board
James Ferdinand, Eden Fire District

PARADISO CONSTRUCTION CO.

GENERAL & PETROLEUM CONTRACTORS



LICENSE NO. 259820
P.O. BOX 1836
2600 WILLIAMS ST.
SAN LEANDRO, CA 94577
(510) 614-8390

July 31, 1992

Pamela Evans
Hazardous Materials Specialist
Alameda County Health Agency
Department of Environmental Health
80 Swan Avenue, Room 200
Oakland, CA 94621

RE: THOMPSON & THOMPSON FENCE COMPANY - TANK REMOVAL

Dear Pamela:


This letter is to confirm that Paradiso Construction Company has been contracted by Thompson & Thompson Fence Company to remove one underground storage tank at 2584 Grant Avenue, San Lorenzo, CA. The closure plan has been submitted and approved by you on 07/18/91. I have enclosed information to update our Contractors status with you.

We are aware that the Environmental Health Department wants the tank removed on a timely basis. After meeting with the Owner and going over our construction schedule, we can confirm that we will schedule the tank removal for the first week of November, 1992. We will be calling you prior to that date to set an exact time for the tank removal inspection.

We appreciate your time and assistance on this project. If you have any questions or require any additional information from us, please feel free to contact myself or Deanna Harding @ 614-8390.

Thank you.

Sincerely,



Paul Paradiso

Enclosures

PP/dlh.700

ALAMEDA COUNTY HEALTH CARE SERVICE AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 HAZARDOUS MATERIALS DIVISION
 80 SWAN WAY, ROOM 200
 OAKLAND, CA 94621
 PHONE NO. 415/271-4320

ORIGINAL
 ORIGINAL

Project Specialist (print) Pamela Evans

7/18/91
 RE

THERE IS A FINANCIAL PENALTY FOR NOT OBTAINING THESE INSPECTIONS.

Issuance of a permit to operate is dependent on compliance with accepted plans and all applicable laws and regulations.

- Final Inspection
- Sampling
- Removal of Tank and Piping

Notify this Department at least 48 hours prior to the following required inspections:

A change or alterations of these plans and specifications must be submitted to this Department and to the Fire and Building Inspection Department to determine if such changes meet the requirements of State and local laws.

One copy of these accepted plans must be on the job and available to all contractors and craftsmen involved with the removal.

These plans have been reviewed and found to be acceptable and essentially meet the requirements of State and local health laws. Changes to your plans indicated by this Department are to assure compliance with State and local laws. The project proposed herein is now released for issuance of any required building permits for construction.

ACCEPTED
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 470 - 27th Street, Third Floor
 Oakland, CA 94612
 Telephone: (415) 874-7237

UNDERGROUND TANK CLOSURE PLAN

* * * Complete according to attached instructions * * *

1. Business Name THOMPSON & THOMPSON FENCE
 Business Owner Gary Thompson
2. Site Address 2584 Grant Avenue
 City San Lorenzo CA Zip 94580 Phone 276-8350
3. Mailing Address P.O. Box 206
 City San Lorenzo CA Zip 94580 Phone 276-8350
4. Land Owner Gary Thompson
 Address P.O. Box 206 City, State San Lorenzo, CA Zip 94580
5. Generator name under which tank will be manifested THOMPSON & THOMPSON FENCE
 EPA I.D. No. under which tank will be manifested CAC000614816

6. Contractor PARADISO CONSTRUCTION COMPANY
Address 9220 G Street
City Oakland, CA 94603 Phone 562-5511
License Type A, B, C-8, C61/D40, C10 ID# 259820

7. Consultant PARADISO CONSTRUCTION COMPANY
Address 9220 G Street
City Oakland, CA 94603 Phone 562-5511

8. Contact Person for Investigation
Name Paul Paradiso Title Project Mgr
Phone 562-5511

9. Number of tanks being closed under this plan One 1,000 gallon fuel tank
Length of piping being removed under this plan N/A
Total number of tanks at facility ONE

10. State Registered Hazardous Waste Transporters/Facilities (see instructions).

**** Underground tanks are hazardous waste and must be handled **
as hazardous waste**

a) Product/Residual Sludge/Rinsate Transporter

Name H & H Environmental Ship Service EPA I.D. No. CAD004771168
Hauler License No. 0334 License Exp. Date 01/31/92
Address 220 China Basin
City San Francisco, State CA Zip 94107

b) Product/Residual Sludge/Rinsate Disposal Site

Name H & H Environmental Ship Service EPA I.D. No. CAD004771168
Address 220 China Basin
City San Francisco State CA Zip 94107

c) Tank and Piping Transporter

Name H & H Environmental Ship Service EPA I.D. No. CAD004771168
Hauler License No. 0334 License Exp. Date 01/31/92
Address 220 China Basin
City San Francisco State CA Zip 94107

d) Tank and Piping Disposal Site

Name H & H Environmental Ship Service EPA I.D. No. CAD004771168
Address 220 China Basin
City San Francisco State CA Zip 94107

11. Experienced Sample Collector

Name _____
Company KAPREALIAN ENGINEERING (K.E.I.)
Address 940 Adams Street
City Benicia State CA Zip 94510 Phone 707-746-6915

12. Laboratory

Name Sequoia Analytical
Address 1900 Bates Avenue, Suite KM
City Concord State CA Zip 94520
State Certification No. 1271

13. Have tanks or pipes leaked in the past? Yes [] No [x]

If yes, describe. _____

14. Describe methods to be used for rendering tank inert

Remove liquid with certified vacuum truck. Insert 50 pounds per thousand
dry ice. Spray ice down with water. Volatilize off all liquid and verify
with GasTech Meter 10% oz./10% LEL before removal.

Before tanks are pumped out and inerted, all associated piping must be flushed out into the tanks. All accessible associated piping must then be removed. Inaccessible piping must be plugged.

The Bay Area Air Quality Management District (771-6000), along with local Fire and Building Departments, must also be contacted for tank removal permits. Fire departments typically require the use of explosion proof combustible gas meters to verify tank inertness. It is the contractor's responsibility to bring a working combustible gas meter on site to verify tank inertness.

15. Tank History and Sampling Information

Tank		Material to be sampled (tank contents, soil, ground-water, etc.)	Location and Depth of Samples
Capacity	Use History (see instructions)		
1,000 gallon	N/A Installed 1978, last used 5/89 Contained leaded gasoline	Ground Water Soil beneath tank or next to tank	any groundwater present in pit 1 @ each end of tank, 1-2' into native soil. If groundwater present, sample at soil/gw interface, 1 at each end of tank.

One soil sample must be collected for every 20 feet of piping that is removed. A ground water sample must be collected should any ground water be present in the excavation.

Excavated/Stockpiled Soil

<p>Stockpiled Soil Volume (Estimated)</p> <p>To be determined</p> <p>3-5 yd³</p>	<p align="center">Sampling Plan</p> <p align="center">1 discrete soil sample</p>
---	---

Stockpiled soil must be placed on bermed plastic and must be completely covered by plastic sheeting.

16. Chemical methods and associated detection limits to be used for analyzing samples

The Tri-Regional Board recommended minimum verification analyses and practical quantitation reporting limits should be followed. See attached Table 2.

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit
<p>Petroleum</p> <p>TPH-G</p> <p>TPH-D</p> <p>BTX&E</p> <p>Total Lead</p>	<p>(GCFID)</p> <p>(GCFID)</p>	<p>5030 soil + GW</p> <p>3510</p> <p>8020 org (soil) AA</p> <p>624 (water)</p>	

17. Submit Site Health and Safety Plan (See Instructions)

18. Submit Worker's Compensation Certificate copy

Name of Insurer R.C. Fischer Company

19. Submit Plot Plan (See Instructions)

20. Enclose Deposit (See Instructions)

21. Report any leaks or contamination to this office within 5 days of discovery. The report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report form. (see Instructions)

22. Submit a closure report to this office within 60 days of the tank removal. This report must contain all the information listed in item 22 of the instructions.

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true.

I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel health and safety. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

Once I have received my stamped, accepted closure plan, I will contact the project Hazardous Materials Specialist at least three working days in advance of site work to schedule the required inspections.

Signature of Contractor

Name (please type) PARADISO CONSTRUCTION COMPANY

Signature Paul Paradiso

Date July 10, 1991

Signature of Site Owner or Operator

Name (please type) Paradiso Construction as Agent for Thompson & Thompson Fence

Signature Paul Paradiso

Date July 10, 1991



CONTRACTORS STATE LICENSE BOARD



License Number

Entity

259820

C O R P

Name/Namestyle

PARADISO CONSTRUCTION CO

Classification(s)

A 8 C-8 C10 C61/023

Expiration Date

08/31/93



CONTRACTORS STATE LICENSE BOARD



License Number

Entity

259820

C O R P

Name/Namestyle

PARADISO CONSTRUCTION CO

Classification(s)

HAZ

Expiration Date

08/31/93

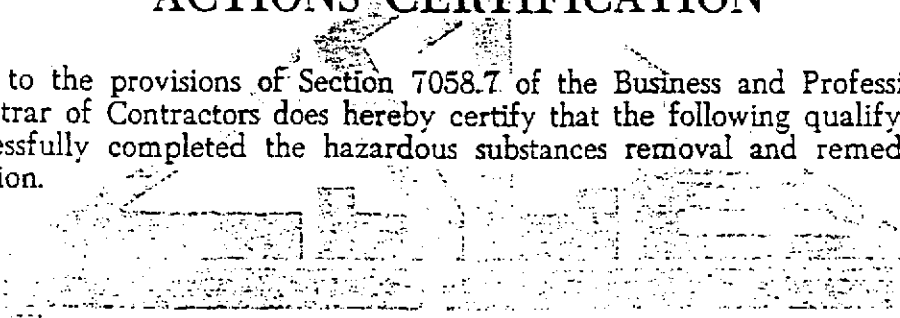




Building Quality

HAZARDOUS SUBSTANCES REMOVAL AND REMEDIAL ACTIONS CERTIFICATION

Pursuant to the provisions of Section 7058.7 of the Business and Professions Code, the Registrar of Contractors does hereby certify that the following qualifying person has successfully completed the hazardous substances removal and remedial actions examination.



Qualifier: PAUL A. PARADISO

License No.: 259820

Namestyle: PARADISO CONSTRUCTION CO



WITNESS my hand and official seal this
5th day of AUGUST 1991

David R. Peltier
Registrar of Contractors

ISL-36 (7/88)

This certification is the property of the Registrar of Contractors, is not transferable, and shall be returned to the Registrar upon demand when suspended, revoked, or invalidated for any reason.

A3970

ACORD. CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY)

3/31/92

PRODUCER

ANITA MEIER AGENCY
 2300 CONTRA COSTA BLVD S-320
 P O BOX 232004
 PLEASANT HILL CA 94523

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

COMPANIES AFFORDING COVERAGE

INSURED

PARADISO CONSTRUCTION INC
 P O BOX 1836
 SAN LEANDRO CA 94577

- COMPANY LETTER **A**
- COMPANY LETTER **B**
- COMPANY LETTER **C**
- COMPANY LETTER **D**
- COMPANY LETTER **E**

REPUBLIC INDEMNITY CO

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN. THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
	GENERAL LIABILITY				
	COMMERCIAL GENERAL LIABILITY				GENERAL AGGREGATE \$
	CLAIMS MADE OCCUR.				PRODUCTS-COMP/OP AGG. \$
	OWNER'S & CONTRACTOR'S PROT.				PERSONAL & ADV. INJURY \$
					EACH OCCURRENCE \$
					FIRE DAMAGE (Any one fire) \$
					MED. EXPENSE (Any one person) \$
	AUTOMOBILE LIABILITY				
	ANY AUTO				COMBINED SINGLE LIMIT \$
	ALL OWNED AUTOS				BODILY INJURY (Per person) \$
	SCHEDULED AUTOS				BODILY INJURY (Per accident) \$
	HIRED AUTOS				PROPERTY DAMAGE \$
	NON-OWNED AUTOS				
	GARAGE LIABILITY				
	EXCESS LIABILITY				
	UMBRELLA FORM				EACH OCCURRENCE \$
	OTHER THAN UMBRELLA FORM				AGGREGATE \$
D	WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY	PC945188	4/01/92	4/01/93X	STATUTORY LIMITS
					EACH ACCIDENT \$ 1,000,000
					DISEASE-POLICY LIMIT \$ 1,000,000
					DISEASE-EACH EMPLOYEE \$ 1,000,000
	OTHER				

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

RE: ALL CALIFORNIA OPERATIONS PERFORMED BY THE NAMED INSURED.
 PLEASE SEE OTHER SIDE FOR SPECIAL CONDITIONS

CERTIFICATE HOLDER

ALAMEDA COUNTY
 ENVIRONMENTAL HEALTH DEPT.
 80 SWAN WAY ROOM #200
 OAKLAND CA 94621

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 10 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

TONI MEIER

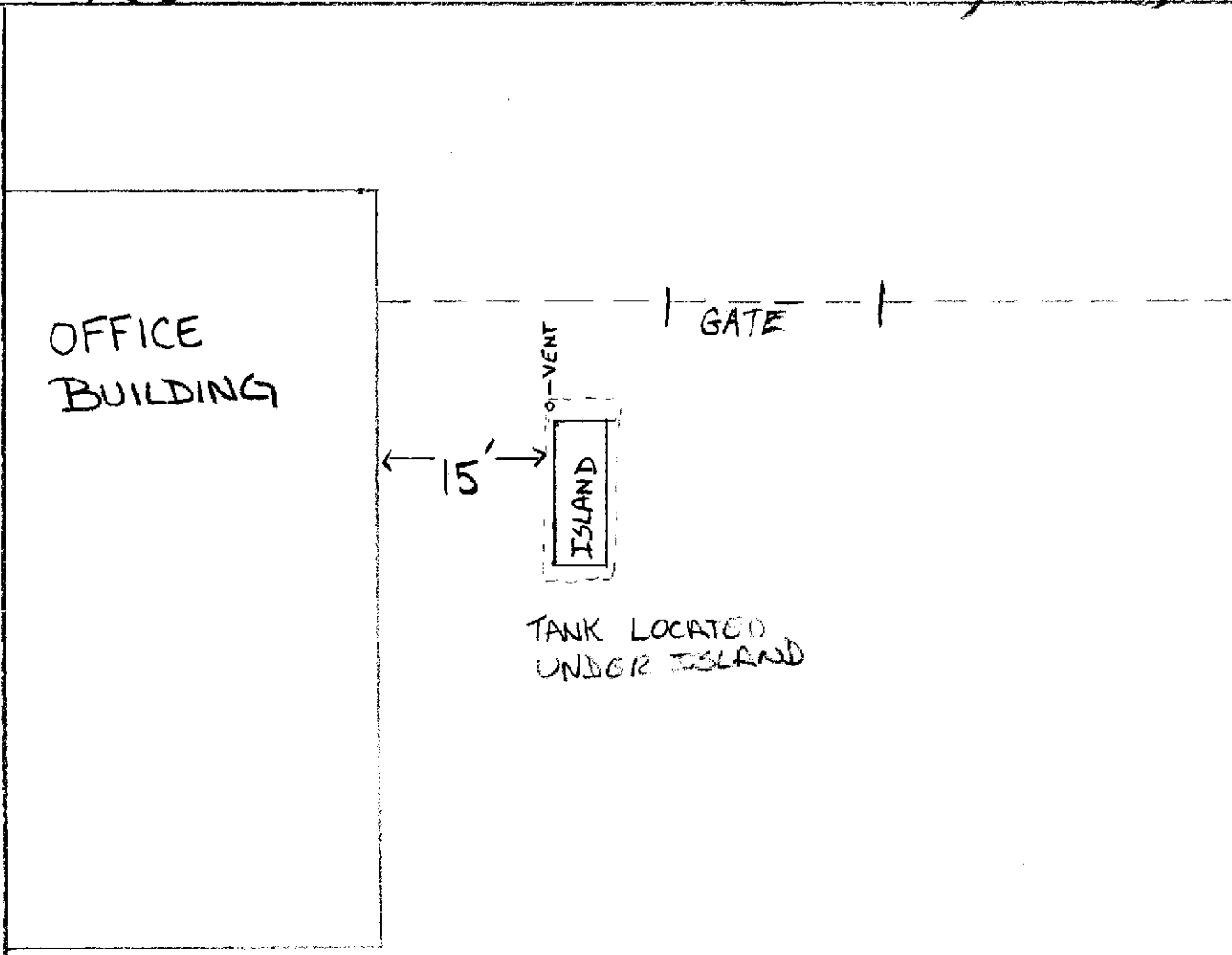
JA(B)

THOMPSON & THOMPSON FENCE

← GRANT AVENUE → 2584 GRANT AVENUE, SLZ, CA

PRIVATE PROPERTY
↓

PRIVATE PROPERTY
↓



REMOVAL - ONE 1,000 GALLON TANK

ACORD. CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY)

3/29/91

PRODUCER
 R. C. Fischer & Co.
 1655 N. Main Street, Suite 360
 P. O. Box 8101
 Walnut Creek, Ca. 94596-8101

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW

COMPANIES AFFORDING COVERAGE

CODE **SUB-CODE**

INSURED
 Paradise Construction Co.
 P. O. Box 6397
 Oakland CA 94603

COMPANY LETTER **A**
 COMPANY LETTER **B**
 COMPANY LETTER **C**
 COMPANY LETTER **D**
 COMPANY LETTER **E**

REPUBLIC INDEMNITY COMPANY

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	ALL LIMITS IN THOUSANDS
	GENERAL LIABILITY COMMERCIAL GENERAL LIABILITY CLAIMS MADE OCCUR. OWNER'S & CONTRACTOR'S PROT.				GENERAL AGGREGATE \$ PRODUCTS-COMP/OPS AGGREGATE \$ PERSONAL & ADVERTISING INJURY \$ EACH OCCURRENCE \$ FIRE DAMAGE (Any one fire) \$ MEDICAL EXPENSE (Any one person) \$
	AUTOMOBILE LIABILITY ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input checked="" type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS <input type="checkbox"/> GARAGE LIABILITY				COMBINED SINGLE LIMIT \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE \$
	EXCESS LIABILITY OTHER THAN UMBRELLA FORM				EACH OCCURRENCE \$ AGGREGATE \$
D	WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY	PC994359	4/01/91	4/01/92	STATUTORY \$ 1000 (EACH ACCIDENT) \$ 1000 (DISEASE—POLICY LIMIT) \$ 1000 (DISEASE—EACH EMPLOYEE)
	OTHER				

INSUREDS COPY

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/RESTRICTIONS/SPECIAL ITEMS

JOB: ALL CALIFORNIA OPERATIONS

CERTIFICATE HOLDER

ALAMEDA COUNTY
 ENVIRONMENTAL HEALTH DEPT
 80 SWAN WAY, ROOM 200
 OAKLAND, CA 94621

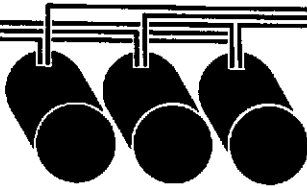
CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 10 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

Carrie Low

PARADISO CONSTRUCTION CO.
GENERAL & PETROLEUM CONTRACTORS



LICENSE NO. 259820
P.O. BOX 6397
9220 "G" STREET OAKLAND, CA 94603
(415) 562-5511

S I T E H E A L T H
&
S A F E T Y P L A N

THOMPSON & THOMPSON FENCE
2584 GRANT AVENUE
SAN LORENZO, CA 94580

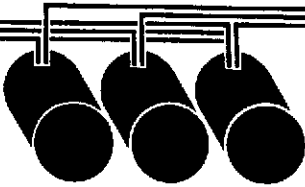
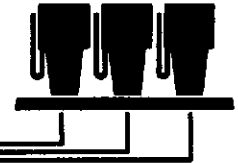
TANK REMOVAL

PARADISO PROJECT #700

JULY 1991

PARADISO CONSTRUCTION CO.

GENERAL & PETROLEUM CONTRACTORS



EMERGENCY INFORMATION

LICENSE NO. 259820
P.O. BOX 6397
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(415) 562-5511

IN CASE OF AN EMERGENCY, USE THIS SHEET

EMERGENCY PHONE NO: 911
SITE ADDRESS: 2584 Grant Avenue
San Lorenzo, CA 94580
SITE PHONE NO: 415-276-8350
NEAREST INTERSECTION: Via Sorrento

SITE LOCATION



C O N T E N T S

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1.0 INTRODUCTION

Paradiso Construction will perform the removal of one 1,000 gallon underground storage tank and dispose of same by a certified tank destroyer. K.E.I to perform sampling of water.

(Thompson & Thompson Fence Co., the Client, will be uncovering top of tank and disposing of any excavated material. They will also be responsible for the backfill of tank hole and resurfacing.)

This health and safety plan is based on the work plan activities and the requirements of Title 29 of the Code of Federal Regulations, Section 1910.120 (29 CFR 1910.120).

2.0 WORK ACTIVITIES

The following subsections provide a description of the work to be performed at the site, as well as health and safety hazards associated with each task.

3.0 ONSITE ORGANIZATION

Each person shall be responsible for following the health and safety plan's guidelines at the site. The site safety officer is the Foreman on site and his duties are to:

- Ensure that the health and safety plan is implemented.
- Ensure that all personnel have proper training and protective equipment.
- Conduct "tailgate" meetings every day before field activities start.
- Stop work if the health and safety of workers is in question.
- Observe workers for signs and symptoms of exposure.
- Evaluate the effectiveness of the personal protective equipment program on an ongoing basis and upgrade the program as needed.
- Inform the field supervisor of any deficiencies or changes in the health and safety practices.

- Perform daily reviews of the work practices and compliance with the health and safety plan.
- Determine exclusion zones and assign personnel duties at each zone in case of an emergency.
- Report any signs of exposure or heat stress to the field supervisor.
- Prevent unauthorized personnel or equipment from entering the exclusion zones.

All essential and nonessential personnel entering or exiting any of the exclusion zones must comply with health and safety practices and procedures described in the health and safety plan.

3.1 PROJECT CONTACTS

Unanticipated occurrences at the site must be reported to the following personnel as soon as possible:

- ERIC V. MONTESANO (RICK), Field Supervisor 415-562-5511
PARADISO CONSTRUCTION COMPANY
Oakland, CA 94603
- PAUL PARADISO, Project Manager 415-562-5511
PARADISO CONSTRUCTION COMPANY
Oakland, CA 94603
- GARY THOMPSON, Owner 415-276-8350
Thompson & Thompson Fence
San Lorenzo, CA 94580
- Kaprealian Engineering, 707-746-6915
Environmental Consultant
Benicia, CA 94540
-

3.2 HEALTH AND SAFETY HAZARDS

There are two categories of health and safety concerns onsite:

- Chemical hazards. This includes:
 - Diesel, Gasoline, Benzene, Toluene, Ethyl Benzene & Xylenes
- Physical hazards. These are presented by:
 - Operation of heavy equipment
 - Automobiles and other vehicle traffic

- Excavation pits
- Underground electrical lines
- Underground water lines
- Underground sewer lines

3.3 EXPOSURE PREVENTION AND SAFETY REQUIREMENTS

This section describes the hazards and danger of exposure to chemical and physical hazards present at the site. Possible contingency plans and safety requirements are also presented in this section.

3.3.1 DIESEL & GASOLINE FUEL HAZARDS:

A. Eye and skin exposure hazards: irritant

In case of exposure:

- Remove contaminated clothing and shoes.
- Flush affected areas with plenty of water, for a minimum of 15 minutes.
- IF IN EYE, hold eyelids open and flush with plenty of water, for a minimum of 15 minutes.
- If irritation or discomfort continues, call for medical aid immediately.

B. Internal exposure hazards: harmful if swallowed

In case of exposure:

- Call for medical aid.
- If victim is CONSCIOUS have victim drink water or milk.
- DO NOT INDUCE VOMITING.

C. Fire hazards: combustible

- Since flammable or combustible vapors are likely to be present all potential sources of ignition must be eliminated. Caution must be taken to prevent the discharge of static electricity and to prevent accumulations of vapor at ground level. A combustible gas indicator should be used *continuously* to check hazardous vapor concentrations, lower explosive limit (LEL). Alarm of the combustible gas indicator should be set at 20% of LEL. Under *Alarm* conditions, all work activities will cease and the area will be evacuated until the combustible vapor concentration can be controlled below 20% of the LEL. All open flame or spark-producing equipment in the area should be shut down and any electrical equipment used must be explosion proof.

In case of fire:

- Extinguish with dry chemical, foam, or carbon dioxide.

- If fire cannot be extinguished within 30 SECONDS, call fire department immediately.
- Water may be ineffective on fire.

3.3.2 Traffic Hazards

Stay at least 10 feet away from moving equipment. If closer than 10 feet:

- Keep equipment in sight at all times.
- Inform the operator of your location.

The working area will be closed to traffic with barricades, caution tape, cones, and other traffic control equipment. If the area cannot be barricaded, a flagperson will be assigned to direct traffic.

No unauthorized or unessential vehicle will be allowed to enter the barricaded area.

3.3.3 Open Excavation Pit Hazards:

Open excavation pits shall be clearly marked and barricaded. No confined space entry will be allowed. If a person falls into an open pit:

- Do not enter the excavation pit.
- If the person is conscious and can move, lower a ladder into the pit so that the person can climb out.
- If the person is unconscious, call the fire department. **DO NOT ENTER THE EXCAVATION PIT.**

3.3.4 Underground Power Line Hazards

Call U.S. ALERT at least 3 days before commencing field work. The Owner will identify aboveground structures and utilities and will provide as-built blueprints for contractor use. If the location of underground utilities such as water, sewer, or electrical lines is still unclear, the contractor will obtain the service of a utility location company before beginning any excavation. An area for an excavated soil stockpile will be provided adjacent to the excavation.

If a power line is discovered or damaged during the work:

- Stop all activities.
- Stop all engines and mechanical and electrical equipment.
- Call U.S. ALERT immediately.

In case of electrical injury:

- Shut off the source of electrical power before attempting rescue or treatment.
- Seek professional electrical personnel (Fire Department) to assist in rescue.

- Beware of, and expect, live electrical current.

3.3.5 Personal Safety Equipment

The following personal protective equipment will be required at all times:

- Hard hat
- Steel-toed shoes
- Safety glasses
- Nitrile gloves (required for personnel who will be coming in contact with soil or groundwater)

The following personal protective equipment will be optional or required as the need arises:

- Hearing protection equipment
- Coveralls (disposable [Tyvek] or fabric [any chemical protective needs])
- Gloves

Additional protection requirements are described in Section 6.0.

3.3.6 General Safety Equipment

The following equipment must be available and easily accessible for use:

- First aid kit
- Fire extinguishers
 - Foam, dry chemical, or carbon dioxide
- Health and safety plan
- Eye wash/shower

4.0 TRAINING

All personnel who may be exposed to onsite contaminants must provide documentation of the following:

- Current certification of 40 hours of (OSHA) classroom instruction/hands-on training, to include:
 - Three days of field experience under the supervision of an experienced supervisor
 - Eight hours of annual classroom refresher training, as appropriate
- Eight hours of supervisory training if a team member is a designated supervisor
- Hazard communication training

5.0 PROJECT-SPECIFIC TRAINING

Project-specific training and information will be provided either before traveling to the site or at the site before entry into the exclusion zone. The information and training will be documented, and will include the following:

- The contents of the health and safety plan
- A discussion of the health and safety hazards; protective measures; and work practices for handling contaminated soil, water, or equipment

6.0 LEVELS OF PROTECTION FOR EACH WORK ZONE

Protective equipment has been selected for use in each zone, based on anticipated hazards. Specific protective equipment requirements are as follows:

- *Exclusion zone.* Level D protection, including a hard hat and steel-toed boots. Safety glasses, hearing protection, Nitrile gloves, and coveralls are optional but recommended.
- *Contamination reduction zone.* Same as exclusion zone.
- *Support zone.* No specific requirements.

7.0 WASTE HANDLING AND DISPOSAL

The waste handling procedures discussed in the work plan will be followed. Waste generated by implementation of this health and safety program may include spent protective clothing, such as Tyvek® suits, gloves, and wash and rinse solutions.

Protective clothing will be collected in a lined container. Liquid wastes will be collected and pumped or poured into holding tanks with equipment decontamination rinsate.

8.0 PERSONAL INJURY

In case of a minor personal injury, general first aid procedures should be implemented. A first aid kit will be available at the site in a designated location.

More serious injuries may require assistance from paramedics. The project manager, site safety officer, or another designated person will contact the appropriate emergency personnel by dialing 911

Field personnel shall report injuries of any personnel to their supervisors as soon as possible.

9.0 EMERGENCY PHONE NUMBERS

Emergency contacts will be made, as necessary, from the list in this section:

Hospital

EDEN HOSPITAL
20103 Lake Chabot Road
Castro Valley, CA 94546

415-537-1234

Ambulance

Call 911

Fire Department

Call 911

Police Department

Call 911

Agency Telephone Numbers

National Response Center
(800) 424-8802

California Department of Health Services
(415) 540-2043

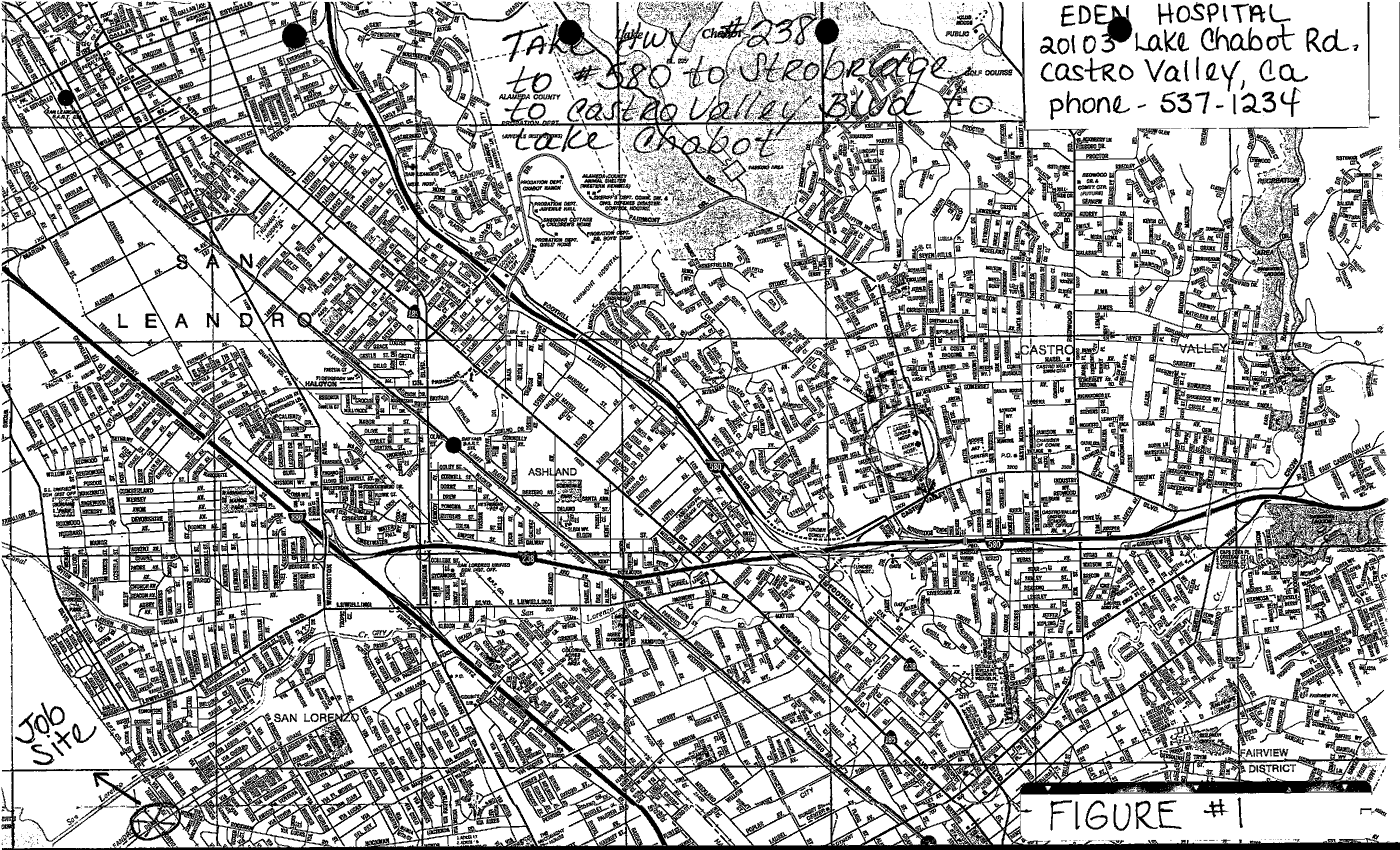
Regional Water Quality Control Board
(415) 464-1255

Bay Area Air Quality Management District
(415) 771-6000

Environmental Protection Agency, Region 9
(415) 974-8076

Chemtrec
(800) 424-9300

Department of Transportation
(415) 876-9085



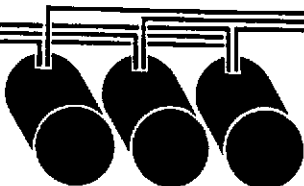
Take Hwy 580 to Stroh bridge
to #580 to Castro Valley Blvd to
Lake Chabot

EDEN HOSPITAL
20103 Lake Chabot Rd.,
Castro Valley, Ca
phone - 537-1234

Job Site

FIGURE #1

PARADISO CONSTRUCTION CO.
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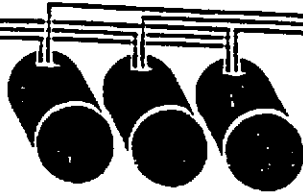
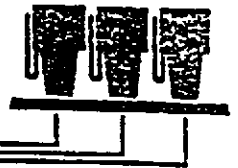
TO WHOM IT MAY CONCERN:

PARADISO CONSTRUCTION COMPANY FIELD EMPLOYEES HAVE RECEIVED THE 40 HOUR TRAINING REQUIREMENT UNDER OSHA STANDARD 29CFR1910.120 HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE TRAINING. ALL FIELD EMPLOYEES COMPLETED SUCH TRAINING FROM THE OCCUPATIONAL HEALTH AND SAFETY GROUP, INC., SANTA CLARA, CALIFORNIA, AND RECEIVED CERTIFICATES FOR COMPLETION OF SUCH TRAINING. CERTIFICATES ARE LOCATED AT THE HEAD OFFICE. FIELD EMPLOYEES HAVE, IN THEIR POSSESSION AT ALL TIMES, THE 40 HOUR OSHA TRAINING WALLET CARD.

MAY 1991

PARADISO CONSTRUCTION CO.

GENERAL & PETROLEUM CONTRACTORS



LICENSE NO. 259820
P.O. BOX 6397
9220 "G" STREET OAKLAND, CA 94603
(415) 562-5511

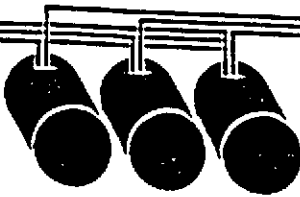
GENERAL

The company will furnish all safety equipment and tools to keep your place of work safe as possible, "use them".

Housekeeping: Keep the jobsite clear of scrap materials and debris especially near the trenches and excavations.

Barricades: The bulk of our work involves underground tanks and piping, so it involves trenching and excavation and a good many sites are kept in operation; we also have to provide safety for the general public. Use an ample amount of barricades and trench covers so that customers that are trying to use the facility are aware of the hazard that exists. Be especially aware of children that come on the site to see what is going on, and keep them well away from the excavation and equipment, or better yet keep them off the site entirely.

PARADISO CONSTRUCTION CO.
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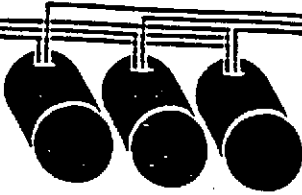
9220 "G" STREET OAKLAND, CA 94603

(415) 562-5511

PERSONAL PROTECTIVE EQUIPMENT

1. EYE PROTECTION: When cutting or burning, chipping or breaking concrete, or anytime you are subjected to eye injury, wear your goggles or safety glasses.
2. HEAD PROTECTION: When you are working in an area where you are subjected to falling objects or the site is a hard hat area, wear your hard hat.
3. BODY PROTECTION: Clothing appropriate for the work must be worn.
4. FOOT PROTECTION: Wear sturdy shoes appropriate to the work you are doing. When using a pavement breaker wear your toe protection devices.
5. HAND PROTECTION: When handling rough materials such as timbers, steel sheets, bars, and scrap; wear your gloves.
6. HEARING PROTECTION: When using a pavement breaker or operating noisy equipment, use your ear protection.
7. RESPIRATORY PROTECTION: Respirators must be worn when working in a confined space where dangerous air contamination exists, when sand blasting where toxic material evolves or when welding where there may be toxic substances.

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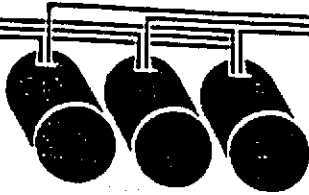
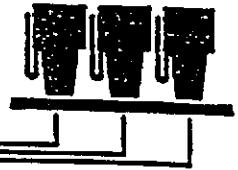
9220 "G" STREET OAKLAND, CA 94603

(415) 562-5511

EQUIPMENT

1. Only trained or experienced employees may operate equipment.
2. Equipment operators must be sure other workers are clear before moving or operating this equipment. When changing buckets, be certain that the workers helping to change the bucket is clear before moving the boom. When using the boom for hoisting or moving equipment and or materials be sure the worker is clear before lifting or taking a strain on rigging.
3. Don't use damaged slings or cables, if they are questionable, call the office for replacement.
4. Avoid operations that expose employees to over head loads.

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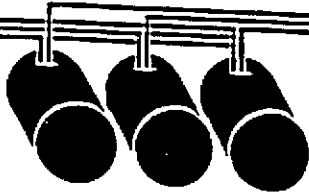


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TOOLS

1. Don't use tools and equipment that are not in good repair; notify the office of the repairs that are needed.
2. All power tools are to be grounded.
3. SKILL SAWS: Saw guard must not be blocked open.
4. AIR COMPRESSORS: Air tank must be drained often, safety valve must be popped daily, all hoses to have safety clasp, and don't disconnect under pressure.
5. LADDERS: Defective or unsafe ladders will not be used, they shall be repaired or scrapped.

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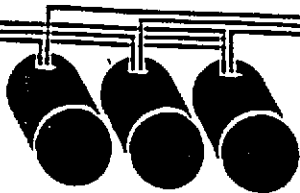
LICENSE NO. 259820
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(415) 562-5511

FIRE PROTECTION/PREVENTION

1. SMOKING: No smoking on any service station site except in an approved area away from the islands and tanks.
2. FLAMMABLE LIQUIDS: No sources of ignition are allowed in any work area where there is presence of flammable liquids, gasoling etc...
3. FIRE EXTINGUISHERS: All trucks and heavy equipment are to be equipped with one 5 lb. A.B.C. extinguisher.
4. Gasoline should not be used as a cleaning agent.
5. No burning or welding should be done in an enclosed tank or vessel until it has been determined that there is no possibility of fire or explosion.
6. A gas detection device is available, all persons should be familiar with this device and know how to use it.

PARADISO CONSTRUCTION CO.

GENERAL & PETROLEUM CONTRACTORS



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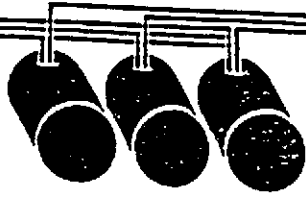
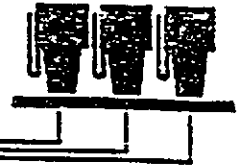
9220 "G" STREET OAKLAND, CA 94603

(415) 562-5511

EXCAVATION

1. Prior to excavating, the location of underground utilities must be determined and utility owners must be notified. This function will normally be done by the office but if you are not sure, call the office, especially, if you are to excavate in the street or sidewalk area.
2. All excavations 5' or more in depth that are to be entered, must be sloped 3/4 to 1 foot or shored.
3. All excavation must be inspected and monitored for ground movement on a continuing basis.
4. There must be proper qualified supervision at all times during excavation.
5. Safety provisions must be taken while installing and removing shoring, the work can be extremely dangerous if good practice is ignored.
6. Keep spoils well back 2' or more from the edge of all excavations.
7. Effective barriers and barricades are to be used around all excavations for your protection as well as others that may want to see the work going on. Keep all others not involved in the work well back from the excavations, especially children.
8. Watch for overhead power lines, keep at least 10' away from these conductors.
9. Trench covers: A facility that is to be kept in operation, as many are, set up barricades and cover trenches to reduce the possibility of a customer driving or walking into an open trench. When work is done for the day, insure that you leave the site in a safe condition.

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CONFINED SPACES

Before employees are allowed to enter confined spaces:

1. Lines containing hazardous substances must be disconnected, blinded, or blocked.
2. The space must be emptied, flushed or purged.
3. The air must be tested for dangerous contamination or oxygen deficiency. Ventilation is required if testing reveals any hazard.

Working in a confined space where dangerous air contamination exists requires:

1. Appropriate respiratory protection.
2. Safety belt (or harness) protection.
3. One standby employee (with respirator).



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

June 27, 1991

*Typed/Correct
actual letter date is
July 7*

Gary A. Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave.
San Lorenzo CA 94580

RE: Abandoned Underground Tank

FINAL NOTICE OF VIOLATION

Dear Mr. Thompson:

On November 16, 1990, I inspected your premises at the above noted address. At that time, you stated to me that the underground fuel tank onsite was empty and had not been used in over two years. You also stated that you did not intend to use the tank to store motor vehicle fuel in the future. On July 18, 1991 I completed my review of your closure plan. On September 17, 1991 I spoke with your office and was told that no date had been set for the tank removal.

Based upon your description of the use of the tank, Thompson and Thompson has been in violation of Section 25298 of the Health and Safety Code of California for at least 1 1/2 years. Section 25298 requires that unused underground fuel storage tanks be monitored or removed. Please note that Section 25299 (a) of the Health and Safety Code of California states that any operator of an underground tank system shall be liable for a civil penalty of not less than \$500 per day for operating an underground tank without a permit or for failing to properly close an underground tank.

You are required either to begin monitoring your tank or remove it by August 7, 1992. Please submit either of the following by July 22, 1992:

1. A monitoring plan that complies with the provisions of Article 4, Chapter 16, Division 3 of Title 23 of the California Code of Regulations.

Gary A. Thompson
Thompson and Thompson
July 7, 1992
Page 2 of 2

2. An updated tank closure plan. Please include any changes to the original plan.

You may contact me with any questions at 271-4320.

Sincerely,



Pamela J. Evans
Senior Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney's Office
Richard Hiett, Regional Water Quality Control Board
James Ferdinand, Eden Fire District

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)

June 27, 1991

Gary A. Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave.
San Lorenzo CA 94580

RE: Abandoned Underground Tank

SECOND NOTICE OF VIOLATION

Dear Mr. Thompson:

On November 16, 1990, I inspected your premises at the above noted address. At that time, you stated to me that the underground fuel tank onsite was empty and had not been used in over two years. You also stated that you did not intend to use the tank to store motor vehicle fuel in the future. I explained to you that unused fuel tanks must be either permitted and monitored or removed.

In accordance with the California Code of Regulations, Title 23, Section 2670, and consistent with your stated intentions regarding the underground tanks, you must submit permit forms and a tank closure plan to this office. These documents must be received by this office **by July 10, 1991**. Include a written timetable of your planned tank removal activities.

Please note ^{15th} that Section 25299 (a) of the Health and Safety Code of California states that any operator of an underground tank system shall be liable for a civil penalty of not less than \$500 per day for operating an underground tank without a permit or for failing to properly close an underground tank.

You may contact me with any questions at 271-4320.

Sincerely,

Pamela J. Evans
Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney's Office
Richard Hiett, Regional Water Quality Control Board
James Ferdinand, Eden Consolidated Fire Prevention District

PARADISO CONSTRUCTION CO.

GENERAL & PETROLEUM CONTRACTORS

9220 'G' STREET • P.O. BOX 6397 • OAKLAND, CA 94603
 (415) 562-5511 Contractor's Lic. #259820

LETTER OF TRANSMITTAL

TO Alameda County Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

DATE	7/10/91	JOB NO.	700
ATTENTION	Pamela J. Evans		
RE:	TANK Closure Plan 2584 Grant Avenue San Lorenzo, CA 94580		

WE ARE SENDING YOU Attached Under separate cover via _____ the following items:

- Shop drawings Prints Plans Samples Specifications
 Copy of letter Change order _____

ORIGINALS

Copies	DATE	NO.	DESCRIPTION
3	7/10/91		ORIGINAL SIGNED TANK Closure Plan.
1	7/10/91	#24021	FEES FOR UNDERGROUND TANK REMOVAL

THESE ARE TRANSMITTED as checked below:

- For approval Approved as submitted Resubmit _____ copies for approval
 For your use Approved as noted Submit _____ copies for distribution
 As requested Returned for corrections Return _____ corrected prints
 For review and comment _____
 FOR BIDS DUE _____ 19 ____ PRINTS RETURNED AFTER LOAN TO US

REMARKS

Pamela - Here it is! - Thanks for the
extra time, I appreciate it. If you need
any further information, please call me -

COPY TO _____

SIGNED: Deanna Harding

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)

January 24, 1991

Gary A. Thompson
Thompson & Thompson Fence Co.
2584 Grant Ave.
San Lorenzo CA 94580

RE: Abandoned Underground Tank

NOTICE OF VIOLATION

Dear Mr. Thompson:

On November 16, 1990, I inspected your premises at the above noted address. At that time, you stated to me that the underground fuel tank onsite was empty and had not been used in over two years. You also stated that you did not intend to use the tank to store motor vehicle fuel in the future. I explained to you that unused fuel tanks must be either monitored or removed. As it is not feasible to monitor an empty tank according to the requirements set forth in Title 23 of the California Code of Regulations, I informed you that your only choice was to remove the tank. I instructed you in writing to submit underground tank permit forms and a timetable for tank removal to my office by December 16, 1990.

Since that date you have not contacted this office or submitted any of the required information or documents. In accordance with the California Code of Regulations, Title 23, Section 2670, and consistent with your stated intentions regarding the underground tanks, you must submit a permit forms and a tank closure plan (enclosed) to this office. **These documents must be received by this office by February 28, 1991. Attach a written timetable of your planned tank removal activities.** You may contact me with any questions at 271-4320.

Sincerely,

Pamela J. Evans
Hazardous Materials Specialist

Enclosures

c: Gil Jensen, Alameda County District Attorney's Office
Richard Hiatt, Regional Water Quality Control Board

COMPLAINT FORM

DATE: 1-10-91

TIME: _____

COMPLAINT RECEIVED BY: Ravi Arulanantham

ADDRESS OF INCIDENT: 2584 Grant Av

San Lorenzo

NAME OF FACILITY: Thompson & Thompson

CONTACT PERSON: Pete (wants to be anonymous)

FACILITY PHONE NUMBER: _____

SUBJECT OF COMPLAINT: Under ground fuel storage tank

~8-10 months ago, Drilled a 12' deep hole ~10' away from tank to east, 8" hole. Gas in tank was getting alot of water in it. Gary Thompson told employee (Pete) want to do the boring. Employee saw about 2" of liquid in bottom of boring. He brought up a sample of the liquid + noted a strong fuel odor.

NAME OF COMPLAINANT: Pete (wants to be anon) PHONE: 447-7671

ACTIONS TAKEN AND DATE(S)

told Pete that I have recently been to the site + spoken to owner about the need to remove the tank

Date investigation was completed: _____

Date complainant contacted: _____

Name of Specialist: _____

Signature: _____

Applied Time: _____

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

Site ID # 919 Site Name Thompson & Thompson Co. ^{Jence} Today's Date 11/16/90

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)

Site Address 2584 Grant Av.
 City San Lorenzo Zip 94580 Phone 276-8350

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

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(i)
- 18. Exemption Request? (Y/N) 25536(b)
- 19. Trade Secret Requested? 25538

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

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: _____ | |

Comments:

This Business runs a fleet of trucks and up until about two years ago operated an underground fuel storage tank of 1000 gallons. This tank contained regular, leaded fuel.

Owner Gary Thompson stated that he does not intend to put the tank back into use.

Unused tanks must be either:

① monitored - not practical as the tank is empty

OR

② Removed (Send closure form)

You must submit a timetable for tank removal by December 16, 1990 to my office. Submit a closure plan for review and approval. Return permit apps by 12/18/90

Rev 8/88

Contact: Gary A. Thompson
 Title: Prop. Owner
 Signature: [Signature]

Inspector: [Signature]
 Signature: [Signature]

II, III