

January 14, 2008

Mr. Steven Plunkett
Alameda County Env. Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

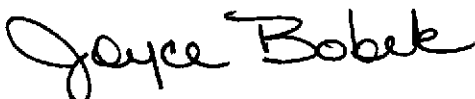
Re: #RO0000473 First Quarter 2008 Groundwater Monitoring Event
Site Location: 15101 Freedom Avenue, San Leandro, California

Dear Mr. Plunkett:

Please be advised that SOMA has scheduled the **First Quarter 2008** groundwater monitoring event to be conducted on Tuesday, January 22, 2008. Our field crew will arrive at the site at approximately 9:30am. Sometimes, however, unforeseen events may cause us to have to reschedule and should this be the case you will be notified immediately.

If you have any questions or comments, please contact Mansour Sepehr at (925) 734-6400.

Sincerely,



Joyce Bobek
Vice President of Operations

cc: Mr. Mohammad Pazdel

RECEIVED
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ENVIRONMENTAL HEALTH SERVICES

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

October 18, 2007

Mr. Mohammad Pazdel
1770 Pistacia Court
Fairfield, CA 94533

Mr. Hamid Khatirine
c/o Mr. Michael D. Liberty
3713 Century Drive
Campbell, CA 95008-3832

Subject: Fuel Leak Case No. RO0000473 (Geotracker Global ID #T0600191157), Arco Service Station, 15101 Freedom Avenue, San Leandro, CA

Dear Mr Pazdel:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted documents entitled, "Additional Soil and Groundwater Investigation Report," dated November 2006, "Work Plan for Monitoring Well Installation, Soil Gas Survey and Remediation Feasibility Study," dated April 11, 2007, "Second Quarter 2007 Groundwater Monitoring Report," dated May 29, 2007. All reports were prepared on your behalf by SOMA Environmental Engineering, Inc. The "Monitoring Well Installation, Soil Gas Survey and Remediation Feasibility Study Report," dated April 11, 2007 proposes a multi-phase extraction (MPE) pilot test combined with an ozone injection permeability study, aquifer pump tests, groundwater monitoring well installation and a soil vapor survey.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Groundwater Monitoring Well Locations and Construction.** SOMA proposes the installation of three groundwater monitoring wells, which will be penetrate the second water bearing unit. Table 1 (Well Completion Details) references monitoring wells MW-1D, MW-2D and MW-3D, while Figure 5 (Proposed Locations of Second WBZ) references monitoring wells MW-1D, MW-3D and MW-4D. Please correct the error in monitoring well reference identification numbers.

Groundwater analytical data collected during in November 2006 identified TPHg and MtBE contamination in groundwater at a depth of approximately 58 feet bgs. in soil boring DPW-3 at concentrations of up to 1760 µg/L and 3330 µg/L, respectively. However, soil analytical data did not detect contamination above laboratory detection limits at this location. Please discuss the mechanism that might explain how MtBE contamination from a downgradient/cross-gradient source would impact groundwater at a depth of 58 feet.

ACEH agrees that additional groundwater monitoring wells must be installed to evaluate the presence of contamination in the deeper water-bearing zone. SOMA recommends the installation of three groundwater monitoring wells. ACEH agrees with the recommendation to install three monitoring wells in the second water bearing zone. Furthermore, SOMA recommends monitoring wells with screen intervals of at least 15 feet. ACEH requires monitoring wells with screen interval of 10 feet or less be installed at your site. Please present results from the monitoring well installation in the report requested below.

2. **Soil Sampling and Analysis.** During monitoring well installation, soil samples must be screened with a PID and soil samples shall be collected at intervals where elevated PID readings are observed or hydrocarbon odor is present, at the capillary fringe and at distinct changes in lithology. ACEH agrees with the laboratory analysis as recommended by SOMA. Results from monitoring well installation are to be presented in the report requested below.
3. **Soil Vapor Study.** Currently, no soil vapor investigation has been conducted at your site. Residences located adjacent to your site may be at risk from petroleum hydrocarbon contamination in the soil vapor phase. In order to evaluate the potential risk associated with the vapor intrusion pathway, SOMA has proposed the installation of three soil vapor sample points near the southeast corner of the site. ACEH requests that one additional soil vapor point must be installed south of MW-2, adjacent to the property line. The laboratory analyses recommended by SOMA are acceptable. Please present the results from the soil vapor assessment in the report requested below.
4. **Off-site Irrigation Well Sampling.** A sensitive receptor survey was completed for the site in October 2003, and the survey identified two domestic irrigation wells downgradient of the site. SOMA attempted to collect a groundwater sample from one of the irrigation wells, but the attempt to collect a groundwater sample was unsuccessful. SOMA was unable to determine the location of the second irrigation well during a canvas of the neighborhood. ACEH agrees that another attempt should be made to collect a groundwater sample from the downgradient irrigation well using a disposable bailer or other sampling equipment, and we agree with the analytical suite recommended by SOMA. Please present result from the off-site irrigation sampling in the report requested below.
5. **Site Lithology and MPE Pilot Test.** Boring logs from wells MW-1, MW-2, MW-4 and boring HSA as well as other onsite and offsite soil borings describe the soils within the capillary fringe and the zone of water table fluctuation (smear zone) as silty clay to clayey silts with minor clayey sand. In order for MPE to be successful, soils within the zone of water table fluctuation must be dewatered and air flow through the contaminated soils established. Consequently, the proposal by SOMA to use four existing monitoring wells for the proposed MPE test is not acceptable. ACEH requests that monitoring wells MW-3 and MW-5 be used for the 72 hour MPE feasibility test. Results from the feasibility test are to be presented in the report requested below.
6. **Smear Zone Thickness.** The Monitoring Well and Feasibility Study Work Plan discusses the presence of a smear zone is between five and 12 feet thick. SOMA asserts that the smear zone thickness in onsite monitoring wells MW-1, MW-3, MW-4, and MW-5 is between 5 to 10 feet. However, groundwater elevation data for these wells show that seasonal water level fluctuations are between two and three feet; these water level data demonstrated the smear zone is approximately three feet thick. Furthermore, SOMA uses qualitative MIP data

collected during the soil and groundwater investigation to calculate the smear zone thickness. ACEH does not agree with the assumption that a smear zone of up to 12-feet thick exists onsite. Rather, a limited zone with a potential hydrocarbon impact exists below the capillary fringe.

- Ozone Sparging.** SOMA states, "ozone sparging would be an effective migration control measure at the site and ozone injection would result in the enhanced biodegradation of dissolved phase petroleum hydrocarbon contamination near monitoring wells MW-6 and MW-7." Considering the linear distance of monitoring wells MW-6 and MW-7 from the nearest on site well MW-5, approximately 100 feet, it is unlikely that ozone sparging in onsite wells will have any impact on downgradient wells over 100 feet away. Furthermore, review of soil boring logs indicates that hydrogeologic conditions may not be favorable to ozone sparging. In particular, borings HAS/MW-1, MW-2, MW-4 consist of fine grain silt and clay soil that will limit the radius of influence during ozone sparging. Correspondingly, dissolved ozone concentrations will be higher near the sparge points, while concentrations of dissolved ozone will decrease significantly radially away from the sparge point. In addition, SOMA posits that dissolved oxygen will migrate down the hydraulic gradient to stimulate in-situ biodegradation of hydrocarbons. There has been no onsite evaluation or analysis to conclude that ozone sparging will result in biodegradation of the hydrocarbon plume near MW-6 and MW-7.

ACEH considers ozone sparging a viable remedial alternative and limited soil permeability testing may be conducted in onsite monitoring wells MW-3 and MW-5. Currently, no water quality data has been collected to determine dissolved oxygen (DO), or oxidation-reduction potential (ORP) in onsite monitoring wells. Prior to ozone sparging feasibility analysis, we request that baseline DO and ORP data must be collected for all onsite and offsite monitoring wells. Please present the results from ozone sparging pilot test in the report requested below.

- Hydrogeologic Cross Sections.** Currently, the cross sections only show limited information including soil classification data, total depth, depth to water data and the possible location of water bearing units and impermeable units. Please update the cross sections to include all soil boring data from the site, observations of free product, staining, or odor, the approximate location of the groundwater table, USTs and dispensers (including the tank pit backfill), and analytical data from soil and groundwater samples for each of the borings and wells shown on the cross sections. Please present these cross section(s) report requested below.

TECHNICAL REPORT REQUEST

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

- **December 15, 2007** – Interim Remedial Action Feasibility Study, Soil Vapor Investigation and Monitoring Well Installation Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

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) requires 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 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

Mohammad Pazdel
October 15, 2007
Page 5

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 call me at (510) 383-1767.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven Plunkett", with a long horizontal flourish extending to the right.

Steven Plunkett
Hazardous Materials Specialist

cc: Mansour Sepehr, SOMA Environmental Engineering, Inc., 6620 Owens Drive, Suite A
Pleasanton, CA 94588-3334

Sunil Ramdass, SWRCB Cleanup Fund, 1001 I Street, 17th floor, Sacramento, CA 95814-
2828

Donna Drogos, ACEH, Steven Plunkett, ACEH, File

RC 473



ENVIRONMENTAL ENGINEERING, INC
6620 Owens Drive, Suite A • Pleasanton, CA 94588-3334
TEL (925) 734-6400 • FAX (925) 734-6401

April 13, 2007

Mr. Steven Plunkett
Alameda County Env. Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Re: **#RO0000473** Second Quarter 2007 Groundwater Monitoring Event
Site Location: 15101 Freedom Avenue, San Leandro, California

Dear Mr. Plunkett:

Please be advised that SOMA has scheduled the **Second Quarter 2007** groundwater monitoring event to be conducted on Thursday, April 26, 2007. Our field crew will arrive at the site at approximately 9:30am. Sometimes, however, unforeseen events may cause us to have to reschedule and should this be the case you will be notified immediately.

If you have any questions or comments, please contact Mansour Sepehr or Tony Perini at (925) 734-6400.

Sincerely,

A handwritten signature in black ink that reads 'Joyce Bobek'. The signature is written in a cursive, flowing style.

Joyce Bobek
Vice President of Operations

cc: Mr. Mohammad Pazdel

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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FAX (510) 337-9335

March 14, 2007

Mr. Mohammad Pazdel
1770 Pistacia Court
Fairfield, CA 94533

Mr. Hamid Khatirine
c/o Mr. Michael D. Liberty
3713 Century Drive
Campbell, CA 95008-3832

Subject: Fuel Leak Case No. RO0000473, Arco Service Station, 15101 Freedom Avenue, San Leandro, CA

Dear Mr Pazdel:

Alameda County Environmental Health Department (ACEH) staff has reviewed the case file and report entitled, "Additional Soil and Groundwater Investigation Report and Site Conceptual Model", dated November 27, 2006 and prepared on your behalf by SOMA Environmental Engineering, Inc. The Investigation presents results from the installation of eight soil boring advanced onsite and immediately down gradient of the site. Elevated concentrations of total petroleum hydrocarbons as gasoline (TPHg), total petroleum hydrocarbons as diesel (TPHd), benzene and Methyl tert-butyle ether (MtBE) were detected in soil and groundwater. In addition, slightly elevated concentrations of petroleum hydrocarbons were detected in soil and groundwater in the lower water-bearing zone.

Based on ACEH staff review of the documents referenced above, we request that you address the following technical comments, perform the proposed work, and 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 COMMENTS

1. **Soil Vapor Sampling and Analysis.** The soil vapor intrusion pathway has not been evaluated for your site. ACEH agrees with the need for a soil vapor study to determine the risk associated with the vapor intrusion pathway. ACEH recommends a soil gas investigation near the southeastern property boundary would be useful to evaluate potential vapor intrusion pathways for the adjacent residents. Please present a detailed plan to perform a soil gas investigation and present your proposal for the soil gas investigation in the Work Plan requested below.

2. **Interim Remediation and Pilot Testing.** Remediation of soil and groundwater will be required for this site due to the presence of elevated concentrations of fuel hydrocarbons in soil and groundwater. Several remedial alternatives have been proposed by SOMA in the SWI including soil excavation, soil vapor extraction, multi phase extraction, groundwater extraction and ozone sparging. ACEH agrees that both DPE and ozone sparging would be viable alternatives for this site. In the Work Plan requested below, please propose pilot testing for the remedial alternatives previously mentioned and discuss your rationale for the chosen remedial alternative.
3. **Second Water Bearing Zone Monitoring Well Installation.** ACEH agrees with the statement that no monitoring wells are completed into the lower water-bearing zone. In order to determine hydrogeologic conditions in the lower water bearing zone, groundwater monitoring wells should be installed. Please discuss in detail your plan to install monitoring wells that will be used evaluate groundwater contamination in the lower water-bearing zone. ACEH does not consider additional investigation of the lower water-bearing zone to be necessary at this time.
4. **Offsite Irrigation Well Location and Sampling.** ACEH agrees with the recommendation by SOMA that a further attempt to be locate two off-site irrigations wells should be made. If the irrigation wells are located and permission is granted to sample the wells, the following groundwater analysis are to be performed: TPHg and TPHd by EPA Method 8015M or 8260, BTEX, EDB, EDC, MtBE, TAME, ETBE, DIPE, TBA and EtOH by EPA Method 8260 and total lead.

TECHNICAL REPORT REQUEST

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

- **April 15, 2007** – Work Plan for Interim Remediation and Soil Gas Survey

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

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) requires 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 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.

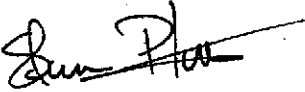
AGENCY OVERSIGHT

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 call me at (510) 383-1767.

Mr. Mohammad Pazdel
March 11, 2007
Page 4

Sincerely,



Steven Plunkett
Hazardous Materials Specialist

cc: Mr. Mansour Sepehr
SOMA Environmental Engineering, Inc.
6620 Owens Drive, Suite A
Pleasanton, CA 94588-3334

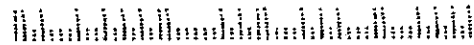
Donna Drogos, ACEH
Steven Plunkett, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
Environmental Health Services Administration
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Mr. Hamid Khatrine
c/o Mr. Michael D. Liberty
3713 Century Drive
Campbell, CA 95008-3832

RETURN TO SENDER
UNABLE TO
FORWARD

94502/6577



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

May 29, 2006

Mr. Mohammad Pazdel
1770 Pistacia Court
Fairfield, CA 94533

✓ Mr. Hamid Khatri
c/o Mr. Michael D. Liberty
3713 Century Drive
Campbell, CA 95008-3832

Subject: Fuel Leak Case No. RO0000473, Arco Service Station, 15101 Freedom Avenue, San Leandro, CA

Dear Mr Pazdel:

Alameda County Environmental Health Department (ACEH) staff has reviewed the case file and work plan entitled, "Work Plan to Conduct an Additional Soil and Groundwater Investigation at The Texaco Gasoline Service Station", dated December 2005 and prepared on your behalf by SOMA Environmental Engineering, Inc. The work plan was submitted in response to a request by ACEH dated November 2005. ACEH agrees with the need for additional investigation to characterize the contaminant plume and the potential plume migration issues beneath nearby residences. Furthermore, we recommend the implementation interim remedial measures combined with a Corrective Action Plan to mitigate off site contamination plume migration. Lastly, ACEH recommends the preparation of a Site Conceptual Model (SCM) to summarize the site background, history, geology, hydrogeology, and investigation results to date for the site. The SCM also presents conclusions and recommendations for future actions.

Based on ACEH staff review of the documents referenced above, we request that you address the following technical comments, perform the proposed work, and 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 COMMENTS

1. **Soil and Groundwater Contamination.** Currently, petroleum hydrocarbons have been detected in groundwater both on site and off site at concentrations ranging from 43,500 µg/L TPHg, 3,630 µg/L benzene, 1,440 µg/L MtBE, 902 µg/L TBA and 277 µg/L TAME. The above referenced report proposes an additional investigation including the installation of eight soil borings to refine on site and off site hydrogeologic conditions and soil and groundwater contamination, installation of one hollow stem auger boring as a calibration for CPT borings and conducting a MIP investigation to define the vertical and horizontal extent of on site and off site soil and groundwater contamination. However, no data has been collected below 30 feet bgs to determine the vertical extent of soil and groundwater contamination on site.

Alameda County

JUN 12 2006

Environmental Health

Please use the CPT/MIP data to target sediments below first-encountered groundwater for proposed depth-discrete soil and groundwater sampling.

- 2. Plume Geometry and Proposed Soil Boring Locations.** ACEH recommends the installation of five on site soil borings, not six as originally proposed by SOMA (see figure 1 for approximate location of all proposed soil borings). Petroleum hydrocarbon contamination has been detected in soil in boring TWB-1 at maximum concentrations of 4,000 mg/kg TPHg, which is in very close proximity to newly proposed soil borings CPT-7 and monitoring well MW-6. Given off site soil and groundwater conditions, combined with the lack of data in the area and the distance -approximately 120 feet- between proposed soil boring CPT-5 and CPT-7, ACEH recommends that soil borings CPT-6 and CPT-7 remain, but the position of the boring be adjusted to help delineate plume geometry. See Figure 1 for approximate locations of soil borings CPT-6, CPT-7 and CPT-8. Additionally, ACEH requests that you define the lateral extent of the contamination plume off site; therefore, ACEH suggests the proposed location of CPT-8 be adjusted to help define the lateral extent of soil and groundwater contamination offsite. See figure 1 for proposed location of soil borings.

ACEH understands that during field investigations conditions may arise that could impact the proposed soil boring locations, and professional judgment must be used if a condition arises requiring the relocation of the proposed soil borings. Additionally, ACEH understands the concerns pertaining to underground utilities; therefore, we suggest either hand-auger or air knife to clear the borings of subsurface utilities. Either of these methods should minimize concerns regarding the installation of CPT boring as originally located.

- 3. Soil and Grab Groundwater Sampling.** All soils from the boreholes are to be examined for staining and odor and are to be screened using a PID. Soil samples are to be collected from any interval where staining, odor, or elevated PID readings are observed or changes in lithology occur. If no staining, odor, or elevated PID readings are observed, soil samples are to be collected from each boring at the capillary fringe, where groundwater is first encountered, changes in lithology, and at five foot intervals until total depth of the boring is reached. Groundwater sample approximately ACEH recommends collection of groundwater samples at 2 to 5 feet below first encountered groundwater and at approximate depths of 20 and 40 feet bgs in each of the proposed borings. After soil sampling has been completed grab groundwater samples are to be collected from the soil boring at the depth discrete intervals suggested by SOMA.

All soil and groundwater samples are to be analyzed for total petroleum hydrocarbons as gasoline (TPHg), benzene, toluene, ethylbenzene, and xylenes (BTEX), and fuel oxygenates MTBE, Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), Tertiary Butyl Alcohol (TBA), and Ethanol by EPA Method 8260 and the lead scavengers, Ethylene Dibromide (EDB), Ethylene Dichloride (EDC) and TPH as diesel (TPHd) using EPA method 8015M. If any of the latter compounds are detected, and are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan. Results from the soil and groundwater investigation are to be presented in the Soil and Groundwater Investigation Report requested below.

4. **Alternatives for Interim Remediation and Control of Groundwater Contaminant Plume Migration.** The goal of plume migration control is to stop plume migration, prevent nuisance conditions, and protect potential receptors such as water supply wells. Interim remediation is necessary to reduce the ultimate impact of the unauthorized release by limiting continued growth and migration of the contaminant plume, and reduce overall cleanup costs. We request that interim remediation be performed following contaminant source characterization. Specifically, the effects of high concentrations of TPHg and other additives and oxygenates on the aerobic degradation of MTBE should be evaluated. Appropriately located and constructed groundwater monitoring wells should be used to monitor and evaluate the effectiveness of remediation within the plume. The results of the off-site subsurface investigation should be used to evaluate the need for migration control. Please include an evaluation of the need for and feasibility of migration control in the Soil and Groundwater Investigation Report requested below
5. **Corrective Action Plan.** The purpose of the CAP is to use the information obtained during investigation activities to propose cost-effective final cleanup objectives for the entire contaminant plume and remedial alternatives for soil and groundwater that will adequately protect human health and safety, the environment, eliminate nuisance conditions, and protect water resources. Please submit a Corrective Action Plan (CAP) for the final cleanup of contamination in soil and groundwater at your site by the date specified below. The CAP should be based on the results of the on-site and off-site subsurface investigation and interim remediation. The CAP must address at least three technically and economically feasible methods to restore and protect beneficial uses of groundwater and to meet the cleanup objective for each contaminant established in the CAP. The CAP must propose verification monitoring to confirm completion of corrective actions and evaluate CAP implementation effectiveness.
6. **Project Approach and Investigation Reporting – Site Conceptual Model**

We anticipate that characterization and remediation work in addition to what is requested in this letter will be necessary at and downgradient from your site. Considerable cost savings can be realized if your consultant focuses on developing and refining a viable Site Conceptual Model (SCM) for the project. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point, the SCM is said to be "validated." The validated SCM then forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

When performed properly, the process of developing, refining and ultimately validating the SCM effectively guides the scope of the entire site investigation. We have identified, based on our review of existing data, some initial key data gaps in this letter and have described several tasks that we believe will provide important new data to refine the SCM. **We request that your consultant develop a SCM for this site, identify data gaps, and propose**

specific supplemental tasks for future investigations. There may need to be additional phases of investigations, each building on the results of the prior work, to validate the SCM. Characterizing the site in this way will improve the efficiency of the work and limit its overall cost.

The SCM approach is endorsed by both industry and the regulatory community. Technical guidance for developing SCMs is presented in API's Publication No. 4699 and EPA's Publication No. EPA 510-B-97-001 both referenced above; and "Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Appendix C," prepared by the State Water Resources Control Board, dated March 27, 2000.

The SCM for this project shall incorporate, but not be limited to, the following:

- a) A concise narrative discussion of the regional geologic and hydrogeologic setting obtained from your background study. Include a list of technical references you reviewed, and copies (photocopies are sufficient) of regional geologic maps, groundwater contours, cross-sections, etc.
- b) A concise discussion of the on-site and off-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to downgradient and above-ground receptors. Be sure to include the vapor pathway in your analysis. Maximize the use of large-scale graphics (e.g., maps, cross-sections, contour maps, etc.) and conceptual diagrams to illustrate key points. Include structural contour maps (top of unit) and isopach maps to describe the geology at your site. Geologic cross-sections, which include an interpretive drawing of the vertical extent of soil and groundwater contamination (i.e., an interpretive drawing—not a plot of laboratory results). The SCM report requested below is to include one cross section parallel and one cross section perpendicular to the contaminant plume axis. Each cross section should include, but not be restricted to, the following:
 1. Subsurface geologic features, depth to groundwater and man-made conduits.
 2. Surface topography. The cross sections should be extended off-site where necessary to show significant breaks in slope.
 3. Soil descriptions for all borings and wells along the line of section.
 4. Screen and filter pack intervals for each monitoring well.
 5. Sampling locations and results for soil and grab groundwater samples.
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- c) Identification and listing of specific data gaps that require further investigation during subsequent phases of work.
- d) Proposed activities to investigate and fill data gaps identified above.
- e) The SCM shall include an analysis of the hydraulic flow system at and downgradient from the site. Include rose diagrams for groundwater gradients. The rose diagram shall be plotted on groundwater contour maps and updated in all future reports submitted for your site. Include an analysis of vertical hydraulic gradients. Note that these likely change due to seasonal precipitation and pumping.

- f) Temporal changes in the plume location and concentrations are also a key element of the SCM. In addition to providing a measure of the magnitude of the problem, these data are often useful to confirm details of the flow system inferred from the hydraulic head measurements. Include plots of the contaminant plumes on your maps, cross-sections, and diagrams.
- g) Several other contaminant release sites exist in the vicinity of your site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for your SCM. Include a summary of work and technical findings from nearby release sites and incorporate the findings from nearby site investigations into your SCM.
- h) Plots of chemical concentrations vs. time and vs. distance from the source. Plots should be shown for each monitoring well, which has had detectable levels of contaminants
- i) Summary tables of chemical concentrations in each historically sampled media (including soil, groundwater and soil vapor).
- j) Boring and well logs (including construction/screening), and a summary table indicating construction specifications for each monitoring and extraction well.

Report the information discussed above in your initial SCM and include it in the Work Plan requested below. Include updates to your SCM in the Soil and Water Investigation (Results of Expedited Site Assessment) Report requested below.

TECHNICAL REPORT REQUEST

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

- **July 31, 2006** – Soil and Groundwater Investigation Report, with initial SCM and Interim Remediation and Migration Control Evaluation
- **August 30, 2006** – Corrective Action Plan

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

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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) requires 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 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.

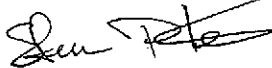
AGENCY OVERSIGHT

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.

Mr. Mohammad Pazdel
April 25, 2006
Page 7

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

Sincerely,



Steven Plunkett
Hazardous Materials Specialist

cc: Mr. Monsour Sepehr
SOMA Environmental Engineering, Inc.
6620 Owens Drive, Suite A
Pleasanton, CA 94588-3334

Donna Drogos, ACEH
Steven Plunkett, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO 473

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

May 29, 2006

Mr. Mohammad Pazdel
1770 Pistacia Court
Fairfield, CA 94533

Mr. Hamid Khatrine
c/o Mr. Michael D. Liberty
3713 Campbell, CA 95008-3832

Alameda County
JUN 05 2006
Environmental Health

Subject: Fuel Leak Case No. RO0000473, Arco Service Station, 15101 Freedom Avenue, San Leandro, CA

Dear Mr Pazdel:

Alameda County Environmental Health Department (ACEH) staff has reviewed the case file and work plan entitled, "Work Plan to Conduct an Additional Soil and Groundwater Investigation at The Texaco Gasoline Service Station", dated December 2005 and prepared on your behalf by SOMA Environmental Engineering, Inc. The work plan was submitted in response to a request by ACEH dated November 2005. ACEH agrees with the need for additional investigation to characterize the contaminant plume and the potential plume migration issues beneath nearby residences. Furthermore, we recommend the implementation interim remedial measures combined with a Corrective Action Plan to mitigate off site contamination plume migration. Lastly, ACEH recommends the preparation of a Site Conceptual Model (SCM) to summarize the site background, history, geology, hydrogeology, and investigation results to date for the site. The SCM also presents conclusions and recommendations for future actions.

Based on ACEH staff review of the documents referenced above, we request that you address the following technical comments, perform the proposed work, and 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 COMMENTS

1. **Soil and Groundwater Contamination.** Currently, petroleum hydrocarbons have been detected in groundwater both on site and off site at concentrations ranging from 43,500 µg/L TPHg, 3,630 µg/L benzene, 1,440 µg/L MtBE, 902 µg/L TBA and 277 µg/L TAME. The above referenced report proposes an additional investigation including the installation of eight soil borings to refine on site and off site hydrogeologic conditions and soil and groundwater contamination, installation of one hollow stem auger boring as a calibration for CPT borings and conducting a MIP investigation to define the vertical and horizontal extent of on site and off site soil and groundwater contamination. However, no data has been collected below 30 feet bgs to determine the vertical extent of soil and groundwater contamination on site.

C:4580



ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
Environmental Health Services Administration
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

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Received
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Mr. Monsour Sepehr
SOMA Environmental Engineering, Inc.
6620 Owens Drive, Suite A
Pleasanton, CA 94588-3334

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

May 29, 2006

Mr. Mohammad Pazdel
1770 Pistacia Court
Fairfield, CA 94533

Mr. Hamid Khatri
c/o Mr. Michael D. Liberty
3713 Campbell, CA 95008-3832

ADDRESS correct by S PLUNKETT EA 06-012

Subject: Fuel Leak Case No. [REDACTED] Arco Service Station, 15101 Freedom Avenue, San Leandro, CA

Dear Mr Pazdel:

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Please use the CPT/MIP data to target sediments below first-encountered groundwater for proposed depth-discrete soil and groundwater sampling.

- 2. Plume Geometry and Proposed Soil Boring Locations.** ACEH recommends the installation of five on site soil borings, not six as originally proposed by SOMA (see figure 1 for approximate location of all proposed soil borings). Petroleum hydrocarbon contamination has been detected in soil in boring TWB-1 at maximum concentrations of 4,000 mg/kg TPHg, which is in very close proximity to newly proposed soil borings CPT-7 and monitoring well MW-6. Given off site soil and groundwater conditions, combined with the lack of data in the area and the distance -approximately 120 feet- between proposed soil boring CPT-5 and CPT-7, ACEH recommends that soil borings CPT-6 and CPT-7 remain, but the position of the boring be adjusted to help delineate plume geometry. See Figure 1 for approximate locations of soil borings CPT-6, CPT-7 and CPT-8. Additionally, ACEH requests that you define the lateral extent of the contamination plume off site; therefore, ACEH suggests the proposed location of CPT-8 be adjusted to help define the lateral extent of soil and groundwater contamination offsite. See figure 1 for proposed location of soil borings.

ACEH understands that during field investigations conditions may arise that could impact the proposed soil boring locations, and professional judgment must be used if a condition arises requiring the relocation of the proposed soil borings. Additionally, ACEH understands the concerns pertaining to underground utilities; therefore, we suggest either hand-auger or air knife to clear the borings of subsurface utilities. Either of these methods should minimize concerns regarding the installation of CPT boring as originally located.

- 3. Soil and Grab Groundwater Sampling.** All soils from the boreholes are to be examined for staining and odor and are to be screened using a PID. Soil samples are to be collected from any interval where staining, odor, or elevated PID readings are observed or changes in lithology occur. If no staining, odor, or elevated PID readings are observed, soil samples are to be collected from each boring at the capillary fringe, where groundwater is first encountered, changes in lithology, and at five foot intervals until total depth of the boring is reached. Groundwater sample approximately ACEH recommends collection of groundwater samples at 2 to 5 feet below first encountered groundwater and at approximate depths of 20 and 40 feet bgs in each of the proposed borings. After soil sampling has been completed grab groundwater samples are to be collected from the soil boring at the depth discrete intervals suggested by SOMA.

All soil and groundwater samples are to be analyzed for total petroleum hydrocarbons as gasoline (TPHg), benzene, toluene, ethylbenzene, and xylenes (BTEX), and fuel oxygenates MTBE, Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), Tertiary Butyl Alcohol (TBA), and Ethanol by EPA Method 8260 and the lead scavengers, Ethylene Dibromide (EDB), Ethylene Dichloride (EDC) and TPH as diesel (TPHd) using EPA method 8015M. If any of the latter compounds are detected, and are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan. Results from the soil and groundwater investigation are to be presented in the Soil and Groundwater Investigation Report requested below.

4. **Alternatives for Interim Remediation and Control of Groundwater Contaminant Plume Migration.** The goal of plume migration control is to stop plume migration, prevent nuisance conditions, and protect potential receptors such as water supply wells. Interim remediation is necessary to reduce the ultimate impact of the unauthorized release by limiting continued growth and migration of the contaminant plume, and reduce overall cleanup costs. We request that interim remediation be performed following contaminant source characterization. Specifically, the effects of high concentrations of TPHg and other additives and oxygenates on the aerobic degradation of MTBE should be evaluated. Appropriately located and constructed groundwater monitoring wells should be used to monitor and evaluate the effectiveness of remediation within the plume. The results of the off-site subsurface investigation should be used to evaluate the need for migration control. Please include an evaluation of the need for and feasibility of migration control in the Soil and Groundwater Investigation Report requested below

5. **Corrective Action Plan.** The purpose of the CAP is to use the information obtained during investigation activities to propose cost-effective final cleanup objectives for the entire contaminant plume and remedial alternatives for soil and groundwater that will adequately protect human health and safety, the environment, eliminate nuisance conditions, and protect water resources. Please submit a Corrective Action Plan (CAP) for the final cleanup of contamination in soil and groundwater at your site by the date specified below. The CAP should be based on the results of the on-site and off-site subsurface investigation and interim remediation. The CAP must address at least three technically and economically feasible methods to restore and protect beneficial uses of groundwater and to meet the cleanup objective for each contaminant established in the CAP. The CAP must propose verification monitoring to confirm completion of corrective actions and evaluate CAP implementation effectiveness.

6. **Project Approach and Investigation Reporting – Site Conceptual Model**

We anticipate that characterization and remediation work in addition to what is requested in this letter will be necessary at and downgradient from your site. Considerable cost savings can be realized if your consultant focuses on developing and refining a viable Site Conceptual Model (SCM) for the project. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point, the SCM is said to be "validated." The validated SCM then forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

When performed properly, the process of developing, refining and ultimately validating the SCM effectively guides the scope of the entire site investigation. We have identified, based on our review of existing data, some initial key data gaps in this letter and have described several tasks that we believe will provide important new data to refine the SCM. **We request that your consultant develop a SCM for this site, identify data gaps, and propose**

specific supplemental tasks for future investigations. There may need to be additional phases of investigations, each building on the results of the prior work, to validate the SCM. Characterizing the site in this way will improve the efficiency of the work and limit its overall cost.

The SCM approach is endorsed by both industry and the regulatory community. Technical guidance for developing SCMs is presented in API's Publication No. 4699 and EPA's Publication No. EPA 510-B-97-001 both referenced above; and "Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Appendix C," prepared by the State Water Resources Control Board, dated March 27, 2000.

The SCM for this project shall incorporate, but not be limited to, the following:

- a) A concise narrative discussion of the regional geologic and hydrogeologic setting obtained from your background study. Include a list of technical references you reviewed, and copies (photocopies are sufficient) of regional geologic maps, groundwater contours, cross-sections, etc.
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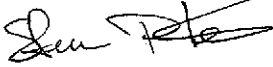
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Mr. Mohammad Pazdel
April 25, 2006
Page 7

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

Sincerely,



Steven Plunkett
Hazardous Materials Specialist

cc: Mr. Monsour Sepehr
SOMA Environmental Engineering, Inc.
6620 Owens Drive, Suite A
Pleasanton, CA 94588-3334

Donna Drogos, ACEH
Steven Plunkett, ACEH
File

ENVIRONMENTAL ENGINEERING, INC
6620 Owens Drive, Suite A • Pleasanton, CA 94588-3334
TEL (925) 734-6400 • FAX (925) 734-6401

May 23, 2006

Mr. Steven Plunkett
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

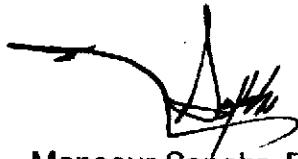
Subject: Texaco Gasoline Service Station (Formerly Freedom ARCO Station)
Site Address: 15101 Freedom Avenue, San Leandro, California
STID 4473/RO0000473

Dear Mr. Hwang:

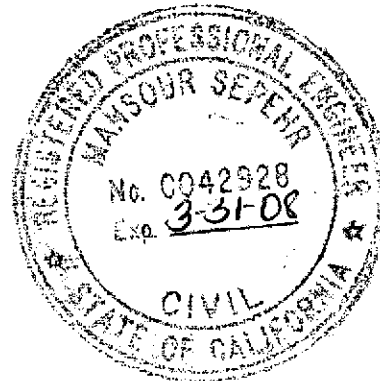
SOMA's "Second Quarter 2006 Groundwater Monitoring Report" for the subject property has been uploaded to the State's GeoTracker database and Alameda County's FTP site for your review.

Thank you for your time in reviewing our report. Please do not hesitate to call me at (925) 734-6400, if you have questions or comments.

Sincerely,



Mansour Sepehr, Ph.D., PE
Principal Hydrogeologist



cc: Mr. Mohammad Pazdel w/report enclosure

Alameda County
MAY 26 2006
Environmental Health

April 28, 2006

Mr. Steven Plunkett
Alameda County Env. Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Re: **#RO0000473** Second Quarter 2006 Groundwater Monitoring Event
Site Location: 15101 Freedom Avenue, San Leandro, California

Dear Mr. Plunkett:

In accordance with the guidelines of the California Regional Water Quality Control Board, SOMA will be conducting a groundwater monitoring event at the above referenced site. The purpose of this monitoring event is to check the site's overall groundwater conditions.

SOMA has scheduled to monitor the subject site on May 9, 2006. Sometimes, however, unforeseen events may cause us to reschedule the date. Should this be the case, you will be notified immediately.

If you have any questions or comments, please contact Mansour Sepehr or me at (925) 734-6400.

Sincerely,



Tony Perini
Senior Project Engineer

cc: Mr. Mohammad Pazdel



ENVIRONMENTAL ENGINEERING, INC
6620 Owens Drive, Suite A • Pleasanton, CA 94588-3334
TEL (925) 734-6400 • FAX (925) 734-6401

March 17, 2006

Mr. Don Hwang
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Subject: Texaco Gasoline Service Station (Formerly Freedom ARCO Station)
Site Address: 15101 Freedom Avenue, San Leandro, California
STID 4473/RO0000473

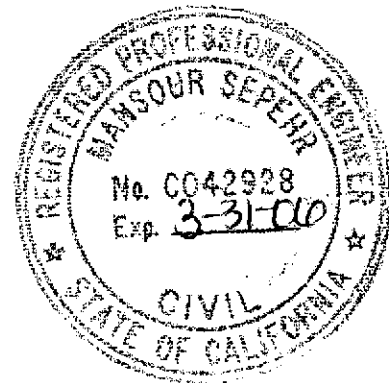
Dear Mr. Hwang:

SOMA's "First Quarter 2006 Groundwater Monitoring Report" for the subject property has been uploaded to the State's GeoTracker database and Alameda County's FTP site for your review.

Thank you for your time in reviewing our report. Please do not hesitate to call me at (925) 734-6400, if you have questions or comments.

Sincerely,

Mansour Sepehr, Ph.D., PE
Principal Hydrogeologist



cc: Mr. Mohammad Pazdel w/report enclosure

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



7

March 16, 2006

Mohammad & Elaine Pazdell
1770 Pistacia Ct.
Fairfield, CA 94533-8831

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

Dear Mr. & Mrs. Pazdell:

Subject: Fuel Leak Case No. [REDACTED], Arco, 15101 Freedom Avenue,
San Leandro, CA

Alameda County Environmental Health (ACEH) staff has reviewed "Work Plan to Conduct an Additional Soil and Water Investigation" dated December 28, 2005 and "Addendum to Work Plan" dated March 3, 2006, both prepared by SOMA Environmental Engineering, Inc. (SOMA). The Work Plan and Addendum which proposes conducting a cone penetrometer test (CPT)/membrane interface probe (MIP) study to evaluate the site's hydrogeology and extent of soil and groundwater contamination is approved provided the following technical comments are addressed. We request that you address the following technical comments, perform the proposed work, and send us the reports requested below.

TECHNICAL COMMENTS

- 1) Analyses – We request that you include the other fuel oxygenates Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), and Tertiary Butyl Alcohol (TBA), Ethanol by EPA Method 8260 and the lead scavengers, Ethylene Dibromide (EDB), Ethylene Dichloride (EDC) for analyses of groundwater samples, and for the lead scavengers, EDB and EDC, also perform analyses on soil samples. If any of the latter compounds are detected, and are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan.
- 2) Onsite benzene soil concentrations exceed Environmental Screening Levels (ESLs) - RWQCB-SFBR's ESLs for vapor intrusion concerns for benzene is 0.18 milligrams/kilogram (mg/kg) for residential exposure or 0.51 mg/kg for commercial/industrial exposure. Up to 20 mg/kg benzene was detected (at 12.5 feet below ground surface (bgs) collected May 1999). Please submit a Work Plan for onsite source remediation after the site has been characterized.

TECHNICAL REPORT REQUEST

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

- May 16, 2006 - Soil and Water Investigation Report

- April 30, 2006 – 1st Quarter 2006 Groundwater Monitoring Report
- July 31, 2006 – 2nd Quarter 2006 Groundwater Monitoring Report
- October 31, 2006 - 3rd Quarter 2006 Groundwater Monitoring Report
- January 31, 2007 - 4th Quarter 2006 Groundwater Monitoring Report

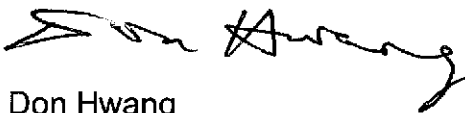
These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from USTs have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

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

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

Enclosure

C: Mansour Sepehr, SOMA Environmental Engineering, Inc., 6620 Owens Drive, Suite A, Pleasanton, CA 94588
Donna Drogos
File



ENVIRONMENTAL ENGINEERING, INC
6620 Owens Drive, Suite A • Pleasanton, CA 94588-3334
TEL (925) 734-6400 • FAX (925) 734-6401

Alameda County
MAR 10 2006
Environmental Health

March 8, 2006

Mr. Don Hwang
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Subject: Texaco Gasoline Service Station (Formerly Freedom ARCO Station)
Site Address: 15101 Freedom Avenue, San Leandro, California
STID 4473/RO0000473

Dear Mr. Hwang:

As requested, enclosed is the Certification Statement required for SOMA's "Addendum to Workplan dated March 3, 2006" for the subject property.

Please do not hesitate to call me at (925) 734-6400, if you have questions or additional information is required.

Sincerely,

Joyce Bobek
Operations Manager

cc: Mr. Mohammad Pazdel



ENVIRONMENTAL ENGINEERING, INC
6620 Owens Drive, Suite A • Pleasanton, CA 94588-3334
TEL (925) 734-6400 • FAX (925) 734-6401

January 26, 2006

Alameda County
JAN 31 2006
Environmental Health

Mr. Don Hwang
Alameda County Env. Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Re: #RO0000473 First Quarter 2006 Groundwater Monitoring Event
Site Location: 15101 Freedom Avenue, San Leandro, California

Dear Mr. Hwang:

In accordance with the guidelines of the California Regional Water Quality Control Board, SOMA will be conducting a groundwater monitoring event at the above referenced site. The purpose of this monitoring event is to check the site's overall groundwater conditions.

SOMA has scheduled to monitor the subject site on February 9, 2006. Sometimes, however, unforeseen events may cause us to reschedule the date. Should this be the case, you will be notified immediately.

If you have any questions or comments, please contact Mansour Sepehr or me at (925) 734-6400.

Sincerely,

Tony Perini
Senior Project Engineer

cc: Mr. Mohammad Pazdel

December 29, 2005

Mr. Don Hwang
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Subject: Texaco Gasoline Service Station (Formerly Freedom ARCO Station)
Site Address: 15101 Freedom Avenue, San Leandro, California
STID 4473/RO0000473

Dear Mr. Hwang:

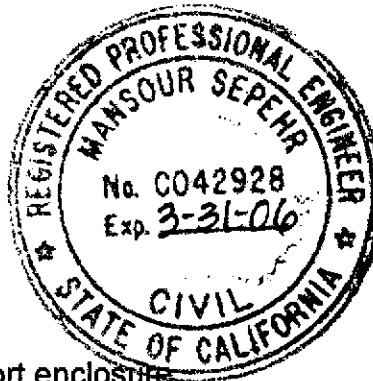
SOMA's "Fourth Quarter 2005 Groundwater Monitoring Report" for the subject property has been uploaded to the State's GeoTracker database for your review.

Thank you for your time in reviewing our report. Please do not hesitate to call me at (925) 734-6400, if you have questions or comments.

Sincerely,



Mansour Sepehr, Ph.D., PE
Principal Hydrogeologist



cc: Mr. Mohammad Pazdel w/report enclosure

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

November 21, 2005

Mohammad & Elaine Pazdell
1770 Pistacia Ct.
Fairfield, CA 94533-8831

Dear Mr. & Mrs. Pazdell:

Subject: Fuel Leak Case No. R0000473, Arco, 15101 Freedom Avenue, San Leandro, CA

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including "Third Quarter 2005 Groundwater Monitoring Report" dated September 28, 2005, prepared by SOMA Environmental Engineering, Inc. (SOMA). Up to 43,500 micrograms/liter (ug/l) Total Petroleum Hydrocarbons-Gasoline (TPH-G) and up to 3,630 ug/l benzene were detected onsite. Offsite groundwater monitoring wells detected up to 6,130 ug/l TPH-G and up to 99 ug/l benzene. We request that you address the following technical comments, perform the proposed work, and send us the reports requested below.

TECHNICAL COMMENTS

1) Onsite benzene soil concentrations exceed Environmental Screening Levels (ESLs) - RWQCB-SFBR's ESLs for vapor intrusion concerns for benzene is 0.18 milligrams/kilogram (mg/kg) for residential exposure or 0.51 mg/kg for commercial/industrial exposure. Up to 20 mg/kg benzene was detected (at 12.5 feet below ground surface (bgs) collected May 1999). Please submit a Work Plan for onsite source remediation.

2) The dissolved contaminant plume may be underneath residential areas - The site is adjacent to and is located near other residential areas. The likelihood that the dissolved contaminant plume may have migrated underneath nearby residential areas and if so, whether ESLs for residential exposure may be exceeded needs to be evaluated. Cross-sections are to be constructed to use to determine if the dissolved contaminant plume may have migrated underneath nearby residential areas. The cross-sections are to illustrate the lateral and vertical extent of soil layers, where groundwater was first encountered in borings and the static water levels, observations of free product, staining, and odor, and soil and groundwater sample locations and their concentrations. In the Work Plan, please include a proposal to construct cross-sections to determine if the dissolved contaminant plume may have migrated underneath nearby residential areas.

3) Source Characterization - Up to 4,000 mg/kg TPH-G and 12 mg/kg benzene were detected in the deepest soil sample collected beneath the underground fuel storage tanks at 24.5 feet below ground surface (bgs). Thus, the source area has not been vertically delineated. We request that you propose additional borings to delineate the vertical extent of soil contamination in the source area in the Work Plan requested below.

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

5) Recommendation to conduct a slug test to design a groundwater extraction system - Not approved at this time.

6) Recommendation to inject Fenton's reagent into well MW-3 – Not approved at this time.

7) Recommendation to conduct a natural attenuation study during quarterly monitoring events - Not approved at this time.

TECHNICAL REPORT REQUEST

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

- January 21, 2006 - Work Plan for Soil and Water Investigation
- January 31, 2006 - 4th Quarter 2005 Groundwater Monitoring Report
- 60 days after Work Plan approval - Soil and Water Investigation Report
- April 30, 2006 – 1st Quarter 2006 Groundwater Monitoring Report
- July 31, 2006 – 2nd Quarter 2006 Groundwater Monitoring Report
- October 31, 2006 - 3rd Quarter 2006 Groundwater Monitoring Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic

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

November 7, 2005

Mohammad & Elaine Pazdell
1770 Pistacia Ct.
Fairfield, CA 94533-8831

Dear Mr. & Mrs. Pazdell:

Subject: Fuel Leak Case No. [REDACTED] Arco, 15101 Freedom Avenue, San Leandro, CA

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including "First Quarter 2005 Groundwater Monitoring Report" dated April 1, 2005, prepared by SOMA Environmental Engineering, Inc. (SOMA). Up to 42,600 micrograms/liter (ug/l) Total Petroleum Hydrocarbons-Gasoline (TPH-G) and up to 3,040 ug/l benzene were detected onsite. Offsite groundwater monitoring wells detected up to 6,040 ug/l TPH-G and up to 125 ug/l benzene. MW-8 was not sampled. We do not concur with SOMA's recommendation for a risk based corrective action plan (RBCA). We request that you address the following technical comments, perform the proposed work, and send us the reports requested below.

TECHNICAL COMMENTS

- 1) Source Characterization - Up to 4,000 milligrams/kilogram (mg/kg) TPH-G and 12 mg/kg benzene were detected in the deepest soil sample collected beneath the underground fuel storage tanks at 24.5 feet below ground surface (bgs). Thus, the source area has not been vertically delineated. We request that you propose additional borings to delineate the vertical extent of soil contamination in the source area in the Work Plan requested below.
- 2) Historical hydraulic gradients – Please show using a rose diagram with magnitude and direction; include cumulative groundwater gradients in all future reports submitted for this site.

TECHNICAL REPORT REQUEST

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

- January 7, 2006 - Work Plan for Soil and Water Investigation
- January 31, 2006 - 4th Quarter 2005 Groundwater Monitoring Report
- 60 days after Work Plan approval - Soil and Water Investigation Report
- April 30, 2006 – 1st Quarter 2006 Groundwater Monitoring Report

- July 31, 2006 – 2nd Quarter 2006 Groundwater Monitoring Report
- October 31, 2006 - 3rd Quarter 2006 Groundwater Monitoring Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from USTs have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

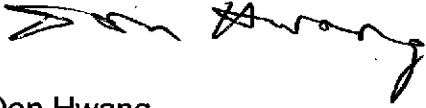
PERJURY STATEMENT

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.

Mr. & Mrs. Pazdell
November 7, 2005
Page 3

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

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hwang", with a stylized flourish at the end.

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Mansour Sepehr, SOMA Environmental Engineering, Inc., 2680 Bishop
Drive, Suite 203, San Ramon, CA 94583
Donna Drogos
File

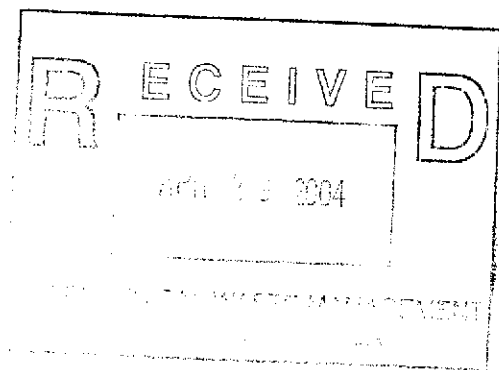
RO-473



ENVIRONMENTAL ENGINEERING, INC
2680 Bishop Drive • Suite 203 • San Ramon, CA 94583
TEL (925) 244-6600 • FAX (925) 244-6601

April 27, 2004

Ms. Eva Chu
Alameda County Env. Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502



Re: **#RO0000473** Second Quarter Groundwater Monitoring Event
Site Location: 15101 Freedom Avenue, San Leandro, California

Dear Ms. Chu:

In accordance with the guidelines of the California Regional Water Quality Control Board, SOMA will be conducting a groundwater monitoring event at the above referenced site. The purpose of this monitoring event is to check the site's overall groundwater conditions.

SOMA has scheduled to monitor the subject site on May 25, 2004. The monitoring events are conducted quarterly; therefore, the next monitoring event will be approximately 3 months from the date referenced above. Sometimes, however, unforeseen events may cause us to reschedule the date. Should this be the case, you will be notified at least 72 hours prior to the monitoring event.

If you have any questions or comments, please contact Mansour Sepehr or me at (925) 244-6600.

Sincerely,

Tony Perini
Tony Perini
Project Engineer

cc: Mr. Mohammad Pazdel



Terry Tamminen
Secretary for
Environmental
Protection

State Water Resources Control Board

Division of Financial Assistance

1001 I Street • Sacramento, California 95814
P.O. Box 944212 • Sacramento, California • 94244-2120
(916) 341-5684 • FAX (916) 341-5806 • www.swrcb.ca.gov/cwphome/ustcf



Arnold Schwarzenegger
Governor

APR 14 2004

Mr. John Rogers
Alameda County Public Works
399 Elmhurst Street
Hayward, CA 94544

Dear Mr. Rogers:

**UNDERGROUND STORAGE TANK CLEANUP FUND (FUND) COVERAGE OF COSTS
FOR OFFSITE MONITORING WELLS: CLAIM NO. 16793; SITE ADDRESS: 15101
FREEDOM AVENUE, SAN LEANDRO, CA**

The purpose of this letter is to document that the State Water Resources Control Board, Underground Storage Tank Cleanup Fund will reimburse Mr. Mohammad Pazdel for all reasonable and necessary costs for construction of the four monitoring wells near the Freedom Arco Mini-Mart located at 15101 Freedom Avenue, San Leandro, California. The Fund will also reimburse the reasonable and necessary costs to maintain the wellheads during the use of the wells and to properly abandon the wells when they are no longer needed.

Sincerely,

Robert Trommer, RG
Chief, Technical Review Unit
Underground Storage Tank Cleanup Fund

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

RO0000473

February 4, 2004

Mr. Mohammed Pazdel
35840 Alcazar Court
Fremont, CA 94536

RE: Work plan Approval for the Former Freedom ARCO Station, 15101 Freedom Ave, San Leandro, CA

Dear Mr. Pazdel:

I have completed review of Soma Environmental Engineering, Inc's (Soma) January 20, 2004 *Workplan to Install Off-Site Monitoring Wells* report prepared for the above referenced site. Soma's proposal to install four groundwater monitoring wells within the first water bearing zone (to a depth of 30 feet bgs) is acceptable. Be advised that well screens should be kept short, no longer than 5 feet in length.

The workplan should be implemented with 90 days of the date of this letter, or by **May 10, 2004**. If you have any questions, I can be reached at (510) 567-6762 or by email at echu@co.alameda.ca.us.

A handwritten signature in black ink, appearing to read 'eva chu', written in a cursive style.

eva chu
Hazardous Materials Specialist

c: Donna Drogos
email: Mansour Sepehr, Soma

freedomARCO-5

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

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

RO0000473

November 12, 2003

Mr. Mohammed Pazdel
35840 Alcazar Court
Fremont, CA 94536

RE: Former Freedom ARCO Station, 15101 Freedom Ave, San Leandro, CA

Dear Mr. Pazdel:

I have completed review of SOMA's November 2003 *Off-Site Soil & Groundwater Investigation* report prepared for the above referenced site. This report summarized the results of the advancement of six temporary well boreholes to delineate the lateral and horizontal extent of the contaminant plume emanating from the referenced site. Soil and water samples collected from the investigation confirmed that the petroleum hydrocarbon plume has migrated off-site at least 300 feet. Free product was noted in borehole TWB-1.

SOMA recommended that off-site groundwater monitoring wells be installed. And that the two downgradient water supply wells in close proximity to the site be sampled, and their construction details evaluated. I concur with SOMA's recommendations. A work plan for the installation of at least two offsite wells (one near TWB-1, another about 100 feet south of TWB-1) should be prepared and submitted to this office for review within 45 days of the date of this letter, or by **December 31, 2003**.

If you have any questions, I can be reached at (510) 567-6762 or by email at echu@co.alameda.ca.us

eva chu
Hazardous Materials Specialist

c: Mansour Sepehr, Soma, 2680 Bishop Dr, Ste 203, San Ramon, CA 94583
Hamid Khatirine, 3713 Century Dr, Campbell, CA 95008-3832
Donna Drogos

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

RO0000473

August 29, 2003

Mr. Mohammed Pazdel
35840 Alcazar Court
Fremont, CA 94536

RE: Former Freedom ARCO Station, 15101 Freedom Ave, San Leandro, CA

Dear Mr. Pazdel:

I have completed review of SOMA's August 26, 2003 fax package. SOMA will drill boreholes to a minimum depth of 40 feet bgs; each borehole will be continuously logged beginning at approximately 25 feet bgs to the bottom of the borehole; select soil samples will be submitted to a laboratory for chemical analysis; and an additional borehole, TWB-6, has been added to the investigation. The proposed changes are acceptable. Field work should commence within 45 days of the date of this letter, or by October 24, 2003. Please provide at least 72 hours advance notice of field activities.

If you have any questions, I can be reached at (510) 567-6762 or by email at echu@co.alameda.ca.us

eva chu
Hazardous Materials Specialist

email: Mansour Sepehr, Soma, 2680 Bishop Dr, Ste 203, San Ramon, CA 94583

c: Hamid Khatirine, 3713 Century Dr, Campbell, CA 95008-3832
Donna Drogos

9/17/03 Roger Pazdel called. Field work commenced yesterday (no notice to this office). Drilling taking longer than anticipated. Will not be able to do all six proposed borings. Rig is only scheduled for 2 days. Discussed giving TWB-2 (on Liberty St) last priority. When results of investigation are in, will determine if TWB-2 is warranted. ee.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

RO0000473

August 20, 2003

Mr. Mohammed Pazdel
35840 Alcazar Court
Fremont, CA 94536

RE: Former Freedom ARCO Station, 15101 Freedom Ave, San Leandro, CA

Dear Mr. Pazdel:

I have completed review of SOMA's July 22, 2003 *Workplan to Conduct Off-Site Soil and Groundwater Investigation* report prepared for the above referenced site. SOMA proposed to drill five temporary well boreholes to evaluate the extent of groundwater contamination. Below are my comments:

- The boreholes should be advanced beyond 30 feet bgs (to at least 40 feet bgs) to determine the vertical extent (to non-detect levels) of contamination.
- Soil samples should be collected, beginning from the capillary fringe to the bottom of the borehole, for field screening (lithologic changes and hydrocarbon contamination). Select soil samples should be submitted to a laboratory for chemical analysis.
- An additional borehole is recommended between TWB-1 and TWB-4 to better assess groundwater contamination beneath the residential area.
- Data from the above investigation will determine the best locations for permanent groundwater monitoring wells. Be advised that well screen intervals must not exceed 5 feet in length; thus, multiple screen intervals may be required for permanent wells.

In a recent conversation with Roger Paplar of SOMA, it appears that the geologic logs this office is in receipt of (for the onsite groundwater monitoring wells) may be inaccurate. Please submit copies of the master bore logs.

If you have any questions, I can be reached at (510) 567-6762 or by email at echu@co.alameda.ca.us

eva chu
Hazardous Materials Specialist

c: Mansour Sepehr, Soma, 2680 Bishop Dr, Ste 203, San Ramon, CA 94583
Hamid Khatirine, 3713 Century Dr, Campbell, CA 95008-3832
Donna Drogos

freedomARCO-2

RO-473



ENVIRONMENTAL ENGINEERING, INC
2680 Bishop Drive • Suite 203 • San Ramon, CA 94583
TEL (925) 244-6600 • FAX (925) 244-6601

July 23, 2003

Alameda County
JUL 25 2003
Environmental Health

Mr. Scott O. Seery
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Subject: Texaco Gasoline Service Station (Formerly Freedom ARCO Station)
Site Address: 15101 Freedom Avenue, San Leandro, California

Dear Mr. Seery:

As you requested in your letter of May 16, 2003, enclosed for your review is SOMA's report entitled "Workplan to Conduct Off-Site Soil and Groundwater Investigation" at the subject site.

Thank you for your time in reviewing this report. If you have any questions or comments, please call me at (925) 244-6600.

Sincerely,

Mansour Sepehr, Ph.D., PE
Principal Hydrogeologist



Enclosure

cc: Mr. Mohammad Pazdel w/enclosure

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

RO0000473

May 16, 2003

Mr. Mohammed Pazdel
35840 Alcazar Court
Fremont, CA 94536

RE: Former Freedom ARCO Station, 15101 Freedom Ave, San Leandro, CA

Dear Mr. Pazdel:

I have completed review of the case file for the above referenced site. Fuel release from the former underground storage tanks has impacted groundwater beneath the site. Data collected from onsite groundwater monitoring wells suggest that the plume has migrated offsite.

At this time, additional investigations are required to delineate the extent of the contaminant plume. You should have a water well survey and preferential pathway survey prepared for the site. Information from the survey should be incorporated into a report with geologic cross-sections and work plan for offsite investigation that will delineate the vertical and horizontal extent of the contaminant plume. The geologic cross-sections should include, at a minimum, groundwater monitoring wells and screen intervals, sewer trenches, soil contamination concentration, and groundwater elevation.

The well and conduit survey should be completed within 45 days of the date of this letter and a work plan for an offsite investigation completed by **August 4, 2003**.

If you have any questions, I can be reached at (510) 567-6762 or by email at echu@co.alameda.ca.us

eva chu
Hazardous Materials Specialist

c: Mansour Sepehr, Soma, 2680 Bishop Dr, Ste 203, San Ramon, CA 94583
Hamid Khatirine, 3713 Century Dr, Campbell, CA 95008-3832
Donna Drogos

720 473
C140



State Water Resources Control Board



Winston H. Hickox
Secretary for
Environmental

Division of Clean Water Programs

1001 I Street • Sacramento, California 95814
P.O. Box 944212 • Sacramento, California • 94244-2120
(916) 341-5714 • FAX (916) 341-5806 • www.swrcb.ca.gov/cwphome/ustcf

Gray Davis
Governor

Protection The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs. **Alameda County** *Ca.gov.*

DEC 10 2002

DEC 13 2002

Mohammad A. Pazdel
35840 Alcazar Ct
Fremont, CA 94536

Environmental Health

UNDERGROUND STORAGE TANK CLEANUP FUND (FUND), CLAIM NO. 016793, FOR SITE ADDRESS: 15101 FREEDOM AVE, SAN LEANDO

The State Water Resources Control Board (State Board) is able to issue, pursuant to applicable regulations, the enclosed Letter of Commitment (LOC) in an amount not to exceed \$50,000. This LOC is based upon our review of the corrective action costs you reported to have incurred to date. The LOC may be modified by the State Board.

Please note: Costs that are associated with offsite investigation will not be reimbursed under this claim.

It is very important that you read the terms and conditions listed in the enclosed LOC. Claims filed with the Underground Storage Tank Cleanup Fund far exceed the funding available and it is very important that you make use of the funding that has been committed to your cleanup in a timely manner.

You are reminded that you must comply with all regulatory agency time schedules and requirements and you must obtain three bids for any required corrective action. Only corrective action costs *required* by the regulatory agency to protect human health, safety and the environment can be claimed for reimbursement. **You are encouraged to obtain preapproval of costs for all future corrective action work (form enclosed).** If you have any questions on obtaining preapproval of your costs or the three bid requirement, please call Sunil Ramdass, our Technical Reviewer assigned to claims in your Region, at (916) 341-5757. Failure to obtain preapproval of your future costs may result in the costs not being reimbursed.

The following documents needed to submit your reimbursement request are enclosed:

Reimbursement Request Instructions and Information packages. **Retain these packages for future reimbursement requests.** These instructions must be followed when seeking reimbursement for corrective action costs incurred after January 1, 1988.

"Reimbursement Request" forms which you **must use to request reimbursement of costs incurred.**

"Spreadsheet" forms which you **must use in conjunction with your reimbursement request.**

California Environmental Protection Agency

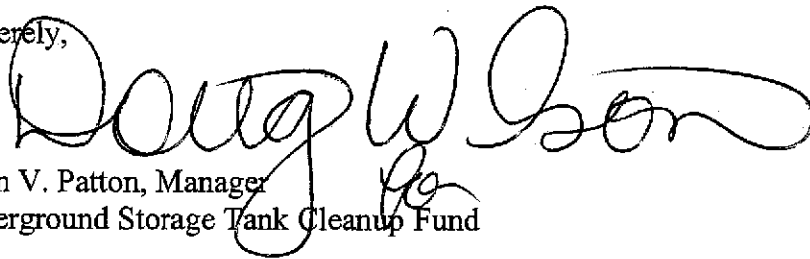


THIS IS IMPORTANT TO YOU, PLEASE NOTE:

You have 90 calendar days from the date of this letter to submit your first reimbursement request for incurred corrective action costs. **NO EXTENSIONS CAN BE GRANTED.** If you fail to do so, your LOC funds will automatically be reduced to zero (deobligated). Once this occurs, any future funds for this site are subject to availability when you submit your first reimbursement request. We continuously review the status of all active claims. You must continue to remain in compliance and submit a reimbursement request every 6 months. Failure to do so will result in the Fund taking steps to withdraw your LOC.

If you have any questions regarding the enclosed documents, please contact Toru Okamoto at (916) 341-5649.

Sincerely,



Allan V. Patton, Manager
Underground Storage Tank Cleanup Fund

Enclosures

cc: Mr. Steve Morse
RWQCB, Region 2
1515 Clay Street, Ste. 1400
Oakland, CA 94612

Ms. Donna Drogos
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577



Winston H. Hickox
Secretary for
Environmental

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State Water Resources Control Board

Division of Clean Water Programs

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P.O. Box 944212 • Sacramento, California • 94244-2120
(916) 341-5714 • FAX (916) 341-5806 • www.swrcb.ca.gov/cwphome/ustcf



Gray Davis
Governor

JUL 30 2002

JUL 24 2002

Mohammad A. Pazdel
35840 Alcazar Ct
Fremont, CA 94536

UNDERGROUND STORAGE TANK CLEANUP FUND (FUND), NOTICE OF ELIGIBILITY DETERMINATION: CLAIM NUMBER 016793; FOR SITE ADDRESS: 15101 FREEDOM AVE, SAN LEANDO

Your claim has been accepted for placement on the Priority List in Priority Class "B" with a deductible of \$5,000.

We have completed our initial review. The next step in the claim review process is to conduct a compliance review.

Compliance Review: Staff reviews, verifies, and processes claims based on the priority and rank within a priority class. After the Board adopts the Priority List, your claim will remain on the Priority List until your Priority Class and rank are reached. At that time, staff will conduct an extensive Compliance Review at the local regulatory agency or Regional Water Quality Control Board. During this Compliance Review, staff may request additional information needed to verify eligibility. Once the Compliance Review is completed, staff will determine if the claim is valid or must be rejected. If the claim is valid, a Letter of Commitment will be issued obligating funds toward the cleanup. If staff determine that you have not complied with regulations governing site cleanup, you have not supplied necessary information or documentation, or your claim application contains a material error, the claim will be rejected. In such event, you will be issued a Notice of Intended Removal from the Priority List, informed of the basis for the proposed removal of your claim, and provided an opportunity to correct the condition that is the basis for the proposed removal. Your claim will be barred from further participation in the Fund, if the claim application contains a material error resulting from fraud or intentional or negligent misrepresentation.

Record keeping: During your cleanup project you should keep complete and well organized records of all corrective action activity and payment transactions. If you are eventually issued a Letter of Commitment, you will be required to submit: (1) copies of detailed invoices for all corrective action activity performed (including subcontractor invoices), (2) copies of canceled checks used to pay for work shown on the invoices, (3) copies of technical documents (bids, narrative work description, reports), and (4) evidence that the claimant paid for the work performed (not paid by another party). These documents are necessary for reimbursement and failure to submit them could impact the amount of reimbursement made by the Fund. *It is not necessary to submit these documents at this time; however, they will definitely be required prior to reimbursement.*

Compliance with Corrective Action Requirements: In order to be reimbursed for your eligible costs of cleanup incurred after December 2, 1991, you must have complied with corrective action requirements of Article 11, Chapter 16, Division 3, Title 23, California Code of Regulations. Article 11 categorized the corrective action process into *phases*. In addition, Article 11 requires the responsible party to submit an

California Environmental Protection Agency



investigative workplan/Corrective Action Plan (CAP) before performing any work. This phasing process and the workplan/CAP requirements were intended to:

1. help the responsible party undertake the necessary corrective action in a cost-effective, efficient and timely manner;
2. enable the regulatory agency to review and approve the proposed cost-effective corrective action alternative before any corrective action work was performed; and
3. ensure the Fund will only reimburse the most cost-effective corrective action alternative required by the regulatory agency to achieve the minimum cleanup necessary to protect human health, safety and the environment.

In some limited situations *interim cleanup* will be necessary to mitigate a demonstrated immediate hazard to public health, or the environment. Program regulations allow the responsible party to undertake interim remedial action after: (1) notifying the regulatory agency of the proposed action, and; (2) complying with any requirements that the regulatory agency may set. Interim remedial action should only be proposed when necessary to mitigate an immediate demonstrated hazard. ***Implementing interim remedial action does not eliminate the requirement for a CAP and an evaluation of the most cost-effective corrective action alternative.***

Three bids and Cost Preapproval: Only corrective action costs required by the regulatory agency to protect human health, safety and the environment can be claimed for reimbursement. You must comply with all regulatory agency time schedules and requirements and you must obtain three bids for any required corrective action. Unless waived in writing, you are required to obtain preapproval of costs for all future corrective action work. ***If you do not obtain three bids or a waiver of the three bid requirement, reimbursement is not assured and costs may be rejected as ineligible.***

If you have any questions, please contact me at (916) 341-5714.

Sincerely,

ORIGINAL SIGNED BY

Shari Knieriem
Claims Review Unit
Underground Storage Tank Cleanup Fund

cc: Mr. Steve Morse
RWQCB, Region 2
1515 Clay Street, Ste. 1400
Oakland, CA 94612

Ms. Donna Drogos
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577



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State Water Resources Control Board

Division of Clean Water Programs

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Gray Davis
Governor

JUN 26 2002

Mohammad A. Pazdel
35840 Alcazar Ct
Fremont, CA 94536

UNDERGROUND STORAGE TANK CLEANUP FUND (FUND), REQUEST FOR FURTHER DOCUMENTATION DURING INITIAL REVIEW: CLAIM NUMBER 016793; FOR SITE ADDRESS: 15101 FREEDOM AVE, SAN LEANDO

After reviewing your claim application to the Cleanup Fund, we find that the following additional information is needed to determine your eligibility for placement on the Priority List.

On September 21, 2001 claimant applied to the Cleanup Fund for reimbursement for corrective action costs due to an unauthorized release of petroleum hydrocarbons at the subject site. After reviewing claimant's documentation it appears that claimant did not comply with the Petroleum Underground Storage Tank Cleanup Fund Regulations, Section 2811(B).

For claims filed on or after January 1, 1994, the claimant had and has obtained any permit or permits required of the claimant pursuant to Chapter 6.7, Division 20, of the California Health and Safety Code, or had filed a substantially complete application for such permit or permits not later than January 1, 1990.

Claimant began the operation of the subject leaking USTs on February 8, 1985. Records from Alameda County Environmental Health Services (County) elected to follow the California Underground Storage Tank Regulations which became effective in August 1985. In 1987, the County began to regulate the USTs. During the next year, 1988, the County began to notify by letter, the known UST owners/operators of the regulations. However, ultimately it was the responsibility of the owner/operator of the USTs to comply with the UST regulations in order to own or operate USTs.

August 20, 1990, the County sent a "Final Notice of Violation" to the subject site regarding the non-compliance with the permit requirement. The County's Hazardous Material Inspection Form completed on August 14, 1991; states claimant has not submitted the UST fees in order for an interim permit to be issued. Further, in the absence of a permit, operating the subject USTs is a violation. On November 15, 1993, the County requested a meeting with claimant regarding the non-payment of the UST permit fees.

Under certain circumstances the State Water Resources Control Board (SWRCB) may waive the permit requirement. There are four conditions of the permit waiver and the claimant must meet all of the conditions in order for the SWRCB to grant the waiver. One condition of the permit waiver stipulates that the claimant was unaware of the permit requirement prior to January 1, 1990 and did not intend to avoid the permit requirement and associated fees. Based on the information from County, it is evident that the claimant had knowledge of the permit requirement. Therefore, the claimant does not meet the requirement of the permit waiver.

California Environmental Protection Agency



JUL 08 2002

Mohammad A. Pazdel

-2-

- In order to access the Fund, claimant must submit documentation that they had met the Permit Requirement as reference in the Petroleum Underground Storage Tank Cleanup Fund Regulations, Section 2811(B).

NOTE: Failure to respond to this request within thirty (30) calendar days from the date of this letter may result in an ineligibility determination of your claim.

If you have any questions, please contact me at (916) 341-5714.

Sincerely,

ORIGINAL SIGNED BY

Shari Knieriem
Claims Review Unit
Underground Storage Tank Cleanup Fund

cc: Mr. Steve Morse
RWQCB, Region 2
1515 Clay Street, Ste. 1400
Oakland, CA 94612

Ms. Donna Drogos
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

July 2, 2002

RO0000473

Mr. Mohammed Pazdel
35840 Alcazar Court
Fremont, CA 94536

RE: (Former) Freedom ARCO Station, 15101 Freedom Avenue

Dear Mr. Pazdel:

We are in receipt of and reviewed the June 5 and June 19, 2002, SOMA Environmental Engineering, Inc. reports. The June 5 report details the installation of five (5) monitoring wells at the subject site, and also presents soil analytical data from soil samples collected during boring advancement, among other elements. The June 19 report presents the initial round of groundwater monitoring and sample analyses occurring the 2nd quarter of this year.

The June 19th report documents up to 12,000 micrograms per liter (ug/l) of methyl tert-butyl ether (MtBE) in water sampled from well MW-4, located directly downgradient and south of the former (and current) underground storage tank (UST) locations. Wells MW-3 and -4 also exhibited noteworthy MtBE impacts (2400 and 1800 ug/l, respectively). Up to 44,000 ug/l Total Petroleum Hydrocarbons as Gasoline (TPH-g) and 6600 ug/l Benzene were identified in water sampled from well MW-3, located cross-gradient of the UST location, and somewhat downgradient of the northern-most dispenser island. Water sampled from well MW-5, located substantially downgradient and southeast of both the USTs and southern-most dispenser island, exhibited a TPH-g concentration of 25,000 ug/l and Benzene concentration of 1000 ug/l. Wells MW-1, -2, and -4 also exhibited elevated concentrations of fuel hydrocarbons, but at magnitudes less than those seen in the other wells.

These data strongly suggest that additional assessment work, much of it in off-site locations, will become necessary in the next several months. This office will advise when it appears prudent to begin this next phase of work.

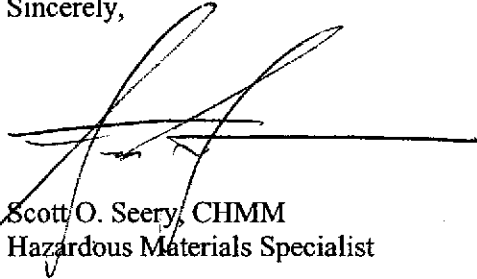
At this time, however, please adhere to a quarterly schedule of well sampling, monitoring and data reporting. Reports are due within 45 days of each sampling and monitoring event. The next event shall be scheduled during the 3rd quarter of 2002 (July - September), and each quarter thereafter until notified otherwise.

In future sampling events, please be certain to analyze for total fuel oxygenates using EPA Method 8260.

Please call me at (510) 567-6783 should there be any question about the content of this letter.

Mohammed Pazdel
RE: 15101 Freedom Ave., San Leandro
July 2, 2002
Page 2 of 2

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott O. Seery', is written over a horizontal line. The signature is stylized with loops and a long horizontal stroke.

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Shari Knieriem, SWRCB UST Fund
Rob Weston, ACDEH
Mansour Sepehr, SOMA Engineering, Inc.
2680 Bishop Dr., Ste. 203, San Ramon, CA 94583
Hamid Khatirine, 3713 Century Dr., Campbell, CA 95008-3832

EO 473
SECRET



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Secretary for
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MAY - 1 2002
Mohammad A. Pazdel
35840 Alcazar Ct
Fremont, CA 94536

MAY 06 2002

UNDERGROUND STORAGE TANK CLEANUP FUND (FUND), REQUEST FOR FURTHER DOCUMENTATION DURING INITIAL REVIEW: CLAIM NUMBER 016793; FOR SITE ADDRESS: 15101 FREEDOM AVE, SAN LEANDO

Please clarify the Site History on your claim application. Upon reviewing your permits; the information on the permits does not match the information on your site history. If necessary, amend page three of the claim application.

Your current permits show that the UST owner/operator is DDH GROUP LLC. This information is not listed on your site history. Also, the reports are to DDH GROUP LLC. What is the relationship between claimant and DDH GROUP LLC?

In 1999, the subject USTs were removed. Was a Leak Report completed at the time of tank removal? The directive from Alameda County is dated 2001. Is there an early directive? If so, provide a copy of the first directive from Alameda County.

All of the issues must be addressed before the claim will be placed on the Priority List.

NOTE: Failure to respond to this request within thirty (30) calendar days from the date of this letter may result in an ineligibility determination of your claim.

If you have any questions, please contact me at (916) 341-5714.

Sincerely,

ORIGINAL SIGNED BY

Shari Knieriem
Claims Review Unit
Underground Storage Tank Cleanup Fund

cc: Mr. Steve Morse
RWQCB, Region 2
1515 Clay Street, Ste. 1400
Oakland, CA 94612

Ms. Donna Drogos
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION
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Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

March 11, 2002

STID 4473/RO0000473

Mr. Mohammed Pazdel
35840 Alcazar Court
Fremont, CA 94536

RE: (Former) Freedom ARCO Station, 15101 Freedom Avenue – Soil and Water Investigation work plan

Dear Mr. Pazdel:

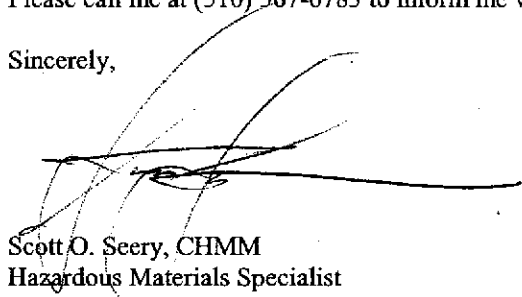
We are in receipt of and reviewed the October 2, 2001 SOMA Environmental Engineering, Inc. work plan for the installation of five (5) monitoring wells at the subject site. This work plan was later revised October 29, 2001 at the request of this office.

The cited SOMA work plan, as revised, is accepted with the following clarification:

- At least one shallow soil sample should be collected from shallow soils (~ 1-2 meter depth) for bulk density, f_{OC} and related physical analyses associated with development of a Conceptual Model and Risk-Based Corrective Action (RBCA) evaluation. This sample would be in addition to any others proposed for this purpose, and should be collected from that boring least expected to be impacted by releases at this site.
- The well seal should be allowed to set up for at least 24 hours (and preferably 72 hours if mechanical procedures are used) prior to well development. The well must also be allowed to settle for at least 24 hours between development and the initial purging/sampling event.

Please call me at (510) 567-6783 to inform me when work has been scheduled to begin at the site.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Mansour Sepehr, SOMA Engineering, Inc., 2680 Bishop Dr., Ste. 203, San Ramon, CA 94583
Farrokh Hosseinyoun, 95 Belvedere St., Ste. 1, San Rafael, CA 94901
Hamid Khatirine, 3713 Century Dr., Campbell, CA 95008-3832

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SICRY



State Water Resources Control Board



Winston H. Hickox
Secretary for
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JAN 3 2002

JAN 08 2002

Freedom Arco Mini-Mart
Mohammad A. Pazdel
15101 Freedom Ave
San Leandro, CA 94578

UNDERGROUND STORAGE TANK CLEANUP FUND (FUND), REQUEST FOR FURTHER DOCUMENTATION DURING INITIAL REVIEW: CLAIM NUMBER 016793; FOR SITE ADDRESS: 15101 FREEDOM AVE, SAN LEANDO

After careful review of the recent documentation that you the following additional information is needed to determine your eligibility for placement on the Priority List:

1. Provide copies of UST owner/operator permits dated between 1992-1998 that will verify that claimant owned the subject USTs. (The copies that you provided are for the new system.)
2. Copies of the Leak Report were not included with you recent submittal of documents. Please provide a copy of the Leak Report.
3. Provide a copy of your most current Financial Responsibility or complete the enclosed forms. The original signed forms should be filed with the local regulator and a copy to the Fund.
4. The current copies of the permits that you provided show the site address as a "Boulevard". Now there are three different names for 15101 Freedom...Ave, Street, or Blvd. Please identify the correct name of the site address.

NOTE: Failure to respond to this request within thirty (30) calendar days from the date of this letter may result in an ineligibility determination of your claim.

If you have any questions, please contact me at (916) 341-5714.

Sincerely,

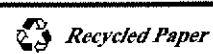
ORIGINAL SIGNED BY

Shari Knieriem
Claims Review Unit
Underground Storage Tank Cleanup Fund

cc: Mr. Steve Morse
RWQCB, Region 2
1515 Clay Street, Ste. 1400
Oakland, CA 94612

Ms. Susan Hugo
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577

California Environmental Protection Agency





State Water Resources Control Board



Winston H. Hickox
Secretary for
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October 17, 2001

Freedom Arco Mini-Mart
Mohammad A. Pazdel
15101 Freedom Dr
San Leandro, CA 94578

UNDERGROUND STORAGE TANK CLEANUP FUND (FUND), REQUEST FOR FURTHER DOCUMENTATION DURING INITIAL REVIEW: CLAIM NUMBER 016793; FOR SITE ADDRESS: 15101 FREEDOM AVE, SAN LEANDO

After reviewing your claim application to the Cleanup Fund, we find that the following additional information is needed to determine your eligibility for placement on the Priority List:

Submit a removal permit for all underground storage tanks listed in claim application.

Submit a copy of the current permit to own or operate the UST from the local regulatory agency (Air Pollution permits are not acceptable). Also, supply evidence that claimant was in compliance with the December 22, 1998 deadline of having USTs upgraded or removed. Provide a copy of the Upgrade Certificate permit as well.

Please verify claimant's mailing address.

Page two of the claim application is not completed. Enclosed is a copy for you to complete. Also provide a copy of the Leak Report which identifies the date of the release.

Claimant's tax identification number must correspond with the claimant name (e.g. individual-social security number; corporation, partnership, estate, trust-federal tax identification number). Who is paying for the cost of the cleanup?

- Claimants who acquire sites after January 1, 1990, must complete the enclosed Claimant Certification of Compliance with Fund Regulations Section 2811(a)(1)-(2) and 2810.1(c) form.

AND

- A copy of the permit to own or operate the UST from the local implementing agency dated between January 1, 1984 and January 1, 1990 (pursuant to Chapter 6.7 of the Health and Safety Code).

California Environmental Protection Agency



NOTE: Failure to respond to this request within thirty (30) calendar days from the date of this letter may result in an ineligibility determination of your claim.

If you have any questions, please contact me at (916) 341-5714.

Sincerely,

ORIGINAL SIGNED BY

Shari Knieriem
Claims Review Unit
Underground Storage Tank Cleanup Fund

cc: Mr. Steve Morse
RWQCB, Region 2
1515 Clay Street, Ste. 1400
Oakland, CA 94612

Ms. Susan Hugo
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577

OCT 23 2001



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL PROTECTION
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Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

August 23, 2001

STID 4473

Mr. Mohammed Pazdel
35840 Alcazar Court
Fremont, CA 94536

RE: (Former) Freedom ARCO Station, 15101 Freedom Avenue – Request for a Soil and Water Investigation work plan

Dear Mr. Pazdel:

We are in receipt of the August 15, 2001 CSS Environmental Services, Inc. (CSS) report documenting the results of the recent preliminary assessment of the subject site. The cited CSS report documents the installation of five (5) push-tool soil borings on July 5, 2001 from which soil and water samples were collected. Collected samples were analyzed by a State-certified laboratory for a range of motor vehicle fuel components.

The results of this work confirm that underlying groundwater has been substantially impacted by a release or releases from the former fuel underground storage tank (UST) system. Up to 87,000 micrograms per liter (ug/l) methyl tert butyl ether (MtBE), 19,000 ug/l benzene, and 83,000 ug/l total petroleum hydrocarbons as gasoline (TPH-G) were identified in water sampled from boring SB-2. The extent of these impacts has not been assessed.

At this time you are requested to submit for review a Soil and Water Investigation (SWI) work plan for the continued assessment of the subject site. This work will entail the installation of an appropriate array of permanent monitoring wells. The requirement for conducting the SWI is pursuant to Sec. 2725 of Article 11, Title 23, California Code of Regulations.

The requested SWI work plan must be submitted with 45 days of the date of this letter.

Please be advised that this letter constitutes a request for technical reports pursuant to California Water Code Sec. 13267(b).

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

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Farrokh Hosseinyoun, 95 Belvedere St., Ste. 1, San Rafael, CA 94901
Hamid Khatirine, 3713 Century Dr., Campbell, CA 95008-3832

CSS

CSS ENVIRONMENTAL SERVICES, INC.
95 Belvedere Street, Suite 2
San Rafael, CA 94901
Telephone: (415) 457-9551
Fax: (415) 457-9261

June 28, 2001

Scott O. Seery, CHMM
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

FAX (510) 337-9335

**Subject: Preliminary Site Assessment Work plan
Former Freedom ARCO Station
15101 Freedom Avenue
San Leandro, CA**

Dear Mr. Seery:

CSS Environmental Services, Inc. (CSS) has been selected to complete the scope of work agreed to in your letter dated June 5, 2001. The Preliminary Site Assessment (PSA) work plan was initially submitted by Cambria Environmental Technology, and modified by Hanover Inc, in their addendum dated May 30, 2001.

The work at the site is being performed for Mr. Farrokh Hosseinyoun under agreement with CSS. A permit has been obtained from the Alameda County Public Works Agency (permit number W01-523) for the Geoprobe borings. A copy of the site safety plan is attached for the field work. CSS anticipates beginning field work on July 5, 2001. We will notify you on July 2, 2001 with an expected start time. The contact in the field will be Mr. Aaron Stessman.

Please contact the undersigned with any questions or comments

Sincerely,
CSS Environmental Services, Inc.



Terry Carter, REA
Project Manager



Aaron Stessman, PE REA
Principal Engineer

cc: Farrokh Hosseinyoun

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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FAX (510) 337-9335

June 5, 2001

STID 4473

Mr. Mohammed Pazdel
35840 Alcazar Court
Fremont, CA 94536

RE: (Former) Freedom ARCO Station, 15101 Freedom Avenue – Preliminary Site
Assessment Work Plan

Dear Mr. Pazdel:

Thank you for our receipt of the September 25, 2000 Cambria Environmental Technology, Inc. (Cambria) preliminary site assessment (PSA) work plan, as submitted under Hanover Incorporated (Hanover) cover dated January 29, 2001. This work plan outlines tasks necessary for completion of the initial phase of the required investigation at the subject site. The original work plan was subsequently modified in a May 30, 2001 Hanover addendum submitted following my discussions with Hanover's Peter Oblander on May 22nd.

The cited Cambria PSA work plan, as revised, has been accepted with the following clarification:

- Groundwater samples are to be collected from the completed boreholes using a device that will minimize the potential for the loss of volatile constituents in collected samples. A "mini" bailer is an example of such a device, while a peristaltic pump is not.

This work plan is to be implemented within 30 days.

Please call me at (510) 567-6783 should you have any questions and to inform me when field work has been scheduled.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott O. Seery', written over a horizontal line.

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Robert Weston, ACDEH
Peter Oblander, Hanover Inc., 56 Hanover Ln., Ste. 100, Chico, CA 95973
Farrokh Hosseinyoun, 95 Belvedere St., Ste. 1, San Rafael, CA 94901
✓ Hamid Khatirine, 1422 Montelegre Dr., San Jose, CA 95120

CC:4580



ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
Environmental Health Services Administration
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

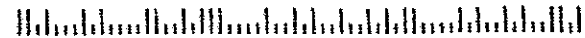
JUN 13 2001



10

Hamid Khattrine
1422 Montelegre Dr.
San Jose, CA 95120

95120X4426 10





11/16/00

Mr. Philip Vermont
McNichols, Randick, O'Dea & Tooliatos
5000 Hopyard Rd., Ste. 400
Pleasanton, Ca 94588

Re: 15101 Freedom Blvd, San Leandro, Ca

Dear Mr. Vermont

I have received notification from Alameda County DEH Records Dept. informing me that the earliest date on which we will be allowed to review the file for the Freedom Blvd. site is December 15, 2000. Due to this inability to collect background data the required workplan will not be completed by our projected completion date of Nov. 30,2000. As soon as we are able to review the file we will issue the workplan.

If you have any questions, please contact me at (530) 342-1333.

Thank you

Will Bono, R.E.A.
Pres., Hanover Inc.

cc: F. Hosseinyoun, DDH
S. Seery, ACDEH ✓



10/30/00

Mr. Philip Vermont
McNichols, Randick, O'Dea & Tooliatos
5000 Hopyard Rd., Ste. 400
Pleasanton, Ca 94588

Re: 15101 Freedom Blvd, San Leandro, Ca

Dear Mr. Vermont

Hanover Environmental Services, Inc (Hanover) has been retained by DDH LLC to conduct the required site investigation for the San Leandro site. At this time we are collecting existing data in preparation for the drafting of a workplan to address the site conditions. We have submitted a request for a file review for the Freedom Blvd. location. This may take a couple of weeks for permission to review the file to be granted. I have contact Mr. Scott Seery of Alameda County Dept. of Environmental Health (ACDEH) to let him know we at initiating work on the project. We intend to have the workplan submitted to ACDEH by Nov 30, 2000.

If you have any questions, please contact me at (530) 342-1333.

Thank you

Will Bono, R.E.A.
Pres., Hanover Inc.

cc: F. Hosseinyoun, DDH
S. Seery, ACDEH

Alameda County Environmental Health

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

FACSIMILE COVER SHEET

TO: Jeff Lawson

FROM: Scott Seery
510 / 567-6783

DATE: 5-31-00

Total number of pages including cover sheet 11

-NOTES- Here ^{are} ~~is~~ the initial 1/3/00 PSA request
(w/ attachment) and NOU of 4/4/00.

Please note that we are stilling awaiting receipt of
The UST disposal manifests requested in January.

| COM No. | REMOTE STATION | START TIME | DURATION | PAGES | RESULT | USER ID | REMARKS |
|---------|----------------|-------------|----------|-------|--------|---------|---------|
| 073 | 408 9931335 | 05-31 16:05 | 04'00 | 11/11 | OK | | |

7499402046

Alameda County Environmental Health

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

FACSIMILE COVER SHEET

TO: Jeff Lawson

FROM: Scott Seery
510 / 567-6783

DATE: 5-31-00

Total number of pages including cover sheet 11

-NOTES- Here ^{are} ~~is~~ the initial 1/3/00 PSA request
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Please note that we are stilling awaiting receipt of
The UST disposal manifests requested in January.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



May 19, 2000

STID 4473

Mr. Mohammed Pazdel
35840 Alcazar Court
Fremont, CA 94536

Mr. Hamid Khatirine
1422 Montelegre Drive
San Jose, CA 95120

Hamid Khatirine
3713 Century Drive
Campbell, CA 95008-3832

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

RE: (Former) Freedom Arco Station, 15101 Freedom Avenue, San Leandro- Preliminary Site Assessment Work Plan

Dear Messrs. Pazdel and Khatirine:

Your case has been referred to the Alameda County District Attorney's Office, Consumer and Environmental Protection Division. This referral was prompted by your failure to comply with requests from this office for the submittal of a Preliminary Site Assessment (PSA) workplan, a violation of several provisions of the California Health and Safety Code and Title 23, California Code of Regulations.

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

Sincerely,

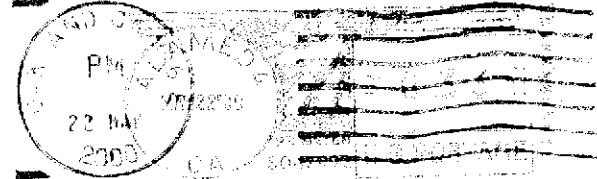

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Mike O'Connor, Alameda County District Attorney's Office
Robert Weston, ACDEH



4580
 ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
 Department Of Environmental Health
 Environmental Protection Division
 1131 Harbor Bay Parkway, Suite 250
 Alameda, CA 94502-6577

ENVIRONMENTAL
 PROTECTION
 00 JUN -2 AM 11: 07



Mr. Hamid Khatirine
 1422 Montelegre Drive
 San Jose, CA 95120

KHAT422 951203040 1599 09 05/24/00
 FORWARD TIME EXP RTN TO SEND
 KHATIRINE
 3713 CENTURY DR
 CAMPBELL CA 95008-3832

RETURN TO SENDER

95120-4426-18
 94502/577



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



April 4, 2000

STID 4473

Mr. Mohammed Pazdel
35840 Alcazar Court
Fremont, CA 94536

Mr. Hamid Khatirine
1422 Montelegre Drive
San Jose, CA 95120

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: (Former) Freedom Arco Station, 15101 Freedom Avenue, San Leandro- Preliminary Site Assessment Work Plan

Dear Messrs. Pazdel and Khatirine:

In correspondence from this office dated January 3, 2000, you were directed to submit a Preliminary Site Assessment (PSA) workplan for the investigation of the subject site due to the verified release of gasoline from the underground storage tank (UST) system previously located there. This workplan was due for submittal within 60 days of the date of that letter, on or around March 3, 2000. The requested workplan has not been submitted.

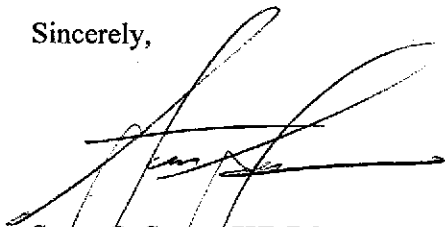
You are currently in violation of provisions of Article 11, *Corrective Action Requirements*, Title 23, California Code of Regulations (CCR) for your collective failure to submit the requested PSA workplan. California Health & Safety Code Section 25299(a)(6) and (b)(6) provide for penalties for such violations of up to \$5000 per violation per day the violation occurs.

As this NOTICE OF VIOLATION documents only the latest in a series of such violations related to UST removals, replacement, and investigation projects at this site in the last 8 months or so, your case will be referred to the Alameda County District Attorney's Office for enforcement action should the subject PSA workplan not be submitted **within 20 days** of the date of this letter.

You may contact me at (510) 567-6783 should you have any questions regarding the content of this letter or your responsibility to comply with the directives presented herein.

Messrs. Pazdel and Khatirine
Re: 15101 Freedom Ave., San Leandro
April 4, 2000
Page 2 of 2

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Mike O'Connor, Alameda County District Attorney's Office
Robert Weston, ACDEH

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



January 13, 2000

STID 4473

Mr. Mohammed Pazdel
35840 Alcazar Court
Fremont, CA 94536

Mr. Rick Hirsch
Service Station Properties
640 So. Winchester Boulevard
San Jose, CA 95128

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

FINAL NOTICE OF VIOLATION

RE: 15101 Freedom Boulevard, San Leandro – Soil Stockpile Management

Dear Messrs. Pazdel and Hirsch:

This FINAL NOTICE OF VIOLATION (NOV) is issued for your collective failure to fully comply with the directives issued in the previous NOV dated November 17, 1999.

At this time you are directed to remove the soil stockpile from this site and dispose of it at a state-licensed landfill of the appropriate classification within 10 days of the date of this letter.

Please be advised that continued failure to comply with this directive will result in the referral of this case to the appropriate enforcement agency.

I may be reached at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Ariu Levi, Chief, Environmental Protection
Robert Weston, ACDEH
Chuck Headlee, RWQCB
Paul Smith, Alameda County Public Works, Clean Water Program
Nick Chimenko, Alameda County Fire Department
Bob Chambers, Alameda County District Attorney's Office

LOP CHANGE RECORD REQUEST FORM

printed:

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

Insp:

AGENCY # : 10000 SOURCE OF FUNDS: F SUBSTANCE: 8006619
 StID : 4473 LOC: -0-
 SITE NAME: Freedom Arco Station Mini Mart DATE REPORTED : 05/20/1999
 ADDRESS : 15101 Freedom Ave DATE CONFIRMED: 05/20/1999
 CITY/ZIP : San Leandro 94578 MULTIPLE RPs : Y

SITE STATUS

 CASE TYPE: S CONTRACT STATUS: 2 PRIOR CODE:-0- EMERGENCY RESP: -0-
 RP SEARCH: s DATE COMPLETED: 05/24/1999
 PRELIMINARY ASMNT: - DATE UNDERWAY: -0- DATE COMPLETED: -0-
 REM INVESTIGATION: - DATE UNDERWAY: -0- DATE COMPLETED: -0-
 REMEDIAL ACTION: - DATE UNDERWAY: -0- DATE COMPLETED: -0-
 POST REMED ACT MON:- DATE UNDERWAY: -0- DATE COMPLETED: -0-
 ENFORCEMENT ACTION TYPE: 1 DATE ENFORCEMENT ACTION TAKEN: 05/25/1999
 LUFT FIELD MANUAL CONSID: 20-
 CASE CLOSED: - DATE CASE CLOSED: -0-
 DATE EXCAVATION STARTED : 05/20/1999 REMEDIAL ACTIONS TAKEN: ED-

RESPONSIBLE PARTY INFORMATION

 RP#1-CONTACT NAME: Mohammed A. Pazdel
 COMPANY NAME: Elaine W. Pazdel
 ADDRESS: 35840 Alcazar Court
 CITY/STATE: Fremont, Ca 94536

RP#2-CONTACT NAME: ~~XXXXXXXXXXXXXXXXXXXX~~
 COMPANY NAME: N/A
 ADDRESS: ~~1422 Montalvo Drive~~
 CITY/STATE: ~~San Jose, Ca 95120~~

INSPECTOR VERIFICATION:

| NAME _____ | SIGNATURE _____ | DATE _____ |
|---------------------------|-----------------|-----------------------|
| Name/Address Changes Only | | Case Progress Changes |
| ANNPGMS _____ | LOP _____ | DATE _____ |
| | | LOP _____ |
| | | DATE _____ |

Note new address !!

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

January 3, 2000

STID 4473

Mr. Mohammed Pazdel
35840 Alcazar Court
Fremont, CA 94536

Mr. Hamid Khatirine
% Law Offices of Michael D. Liberty
1290 Howard Avenue, Ste. 333
Burlingame, CA 94010

RE: (Former) Freedom ARCO Station, 15101 Freedom Avenue – Request for
Preliminary Site Assessment Work Plan

Dear Messrs. Pazdel and Khatirine:

Three 10,000-gallon gasoline underground storage tanks (UST) were removed from this site on May 20, 1999. Evidence of an unauthorized release was identified during tank removals, primarily as a result of the presence of a corrosion hole in the bottom of the central tank. This unauthorized release was further substantiated through analyses of soil samples collected from the base of the UST excavation. Up to 4000 parts per million (ppm) total petroleum hydrocarbons as gasoline (TPH-G) and 28 ppm benzene, among other compounds detected, were identified in samples collected up to a depth of 24.5' below grade. Groundwater was not observed.

Consistent with provisions of Article 11, *Corrective Action Requirements*, Section 2720 et seq., Title 23, California Code of Regulations (CCR), a Preliminary Site Assessment (PSA) must be conducted to initially assess the extent of the release at the site. The PSA typically involves the installation of several soil borings and construction of an array of monitoring wells strategically located to track contaminant location.

In order to facilitate this task, you are required to hire a California-registered engineer or geologist with the appropriate experience conducting such environmental projects to draft and submit a PSA workplan. Such licensing and registration is by provision of the California Business and Professions Code. The PSA work plan will present the anticipated scope of work necessary to complete this phase of the site assessment. Attached to this letter please find "Appendix A", a guide you may give to your chosen consultant to assist them in the submittal of an appropriate PSA work plan.

Messrs. Pazdel and Khatirine
RE: 15101 Freedom Ave., San Leandro
January 3, 2000
Page 2 of 2

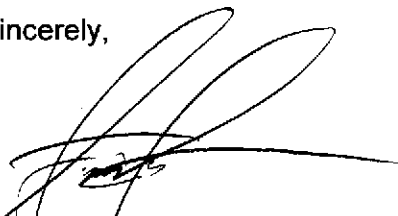
The PSA work plan is due within 60 days of the date of this letter.

In addition, the soil stockpile generated during the May and June 1999 excavation activities is still located at the site. I have been informed by Mike Leedham (Le Beck Co.) that, after several delays, this stockpile should be transported to an appropriate landfill this week. Disposal receipts from the landfill are to be submitted to this office once this work has been completed.

In addition, copies of the Uniform Hazardous Waste Manifests (UHW) that were to have accompanied the USTs when they were transported off-site following their removals have yet to be submitted. Signed copies of these UHW documents are to be submitted within 15 days.

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

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachment (addressee, only)

cc: Chuck Headlee, RWQCB
Robert Weston, ACDEH
Rick Hirsch, Service Station Properties
640 So. Winchester Blvd., San Jose, CA 95128
David Mordick, Paradiso Mechanical, Inc.
P.O. Box 1836, San Leandro, CA 94577

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

| | | | | | | |
|--|--|---|---|--|--|--|
| EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | | HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input type="checkbox"/> NO | | FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I HAVE DISTRIBUTED THIS INFORMATION ACCORDING TO THE DISTRIBUTION SHOWN ON THE INSTRUCTION SHEET ON THE BACK PAGE OF THIS FORM. | | |
| REPORT DATE 01/03/00 | | CASE # 4473 | | SIGNED _____ DATE _____ | | |
| REPORTED BY | NAME OF INDIVIDUAL FILING REPORT Scott Seery | | PHONE (510) 567-6783 | | SIGNATURE | |
| | REPRESENTING <input checked="" type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> OTHER | | COMPANY OR AGENCY NAME Alameda Co. Env Health Dept. | | | |
| | ADDRESS 1131 Harbor Bay Pkwy Alameda CA 94502 | | | | | |
| RESPONSIBLE PARTY | NAME Mohammed A. Pazzal <input type="checkbox"/> UNKNOWN | | CONTACT PERSON Same | | PHONE () UNK | |
| | ADDRESS 35840 Alcazar Ct. Fremont CA 94536 | | | | | |
| SITE LOCATION | FACILITY NAME (IF APPLICABLE) Freedom ARCO | | OPERATOR Hamid Khatirine | | PHONE () UNK | |
| | ADDRESS 15101 Freedom Ave. San Leandro Alameda 94578 | | | | | |
| | CROSS STREET Fairmount Ave. | | | | | |
| IMPLEMENTING AGENCIES | LOCAL AGENCY Alameda Co. Env. Health | | CONTACT PERSON Scott Seery | | PHONE (510) 567-6783 | |
| | REGIONAL BOARD San Francisco | | CONTACT PERSON Chuck Headlee | | PHONE (510) 622-2433 | |
| SUBSTANCES INVOLVED | (1) NAME gasoline | | | | QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN | |
| | (2) _____ <input type="checkbox"/> UNKNOWN | | | | | |
| DISCOVERY/ABATEMENT | DATE DISCOVERED 05/20/99 | | 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 05/20/99 | | | | | |
| SOURCE/ CAUSE | SOURCE OF DISCHARGE <input checked="" type="checkbox"/> TANK LEAK <input type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER | | CAUSE(S) <input checked="" type="checkbox"/> OVERFILL <input checked="" type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL <input checked="" type="checkbox"/> CORROSION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER | | | |
| | CHECK ONE ONLY <input checked="" type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED) | | | | | |
| CURRENT STATUS | CHECK ONE ONLY <input type="checkbox"/> NO ACTION TAKEN <input checked="" type="checkbox"/> PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED <input type="checkbox"/> POLLUTION CHARACTERIZATION <input type="checkbox"/> LEAK BEING CONFIRMED <input 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) <input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> VENT SOIL (VS) <input type="checkbox"/> VACUUM EXTRACT (VE) <input checked="" type="checkbox"/> OTHER (OT) UNK | | | | | |
| COMMENTS | Project in PSA stage now. | | | | | |



Alameda Countywide Clean Water Program
Standard Stormwater Facility Inspection Report Form

site/business not currently open for business.

Municipality San Leandro, 94578
11/22/99
Facility has closed or Facility Information has changed

Reason for Inspection: First Inspection Routine Inspection Response to Complaint Follow-up Follow-up Inspection Due:

NAME OF FACILITY: Former Arco Service Station SITE ADDRESS: 15101 Freedom Blvd.

CONTACT NAME: no attendan / worker onsite PHONE: fuel station BUSINESS TYPE/ACTIVITY: fuel station SIC:

Is the property owner different than the facility owner? yes no If yes, complete the following

NAME: Sent a copy of this report through to owner a Developer - Paredel PHONE:

MAILING ADDRESS:

Is the facility covered under any other programs or permits? (Check all that apply.)

Air quality Hazmat business plan None Sanitary sewer
 Fire department (hazmat storage) Hazmat waste generator Underground storage tanks Aboveground storage tanks
 Other

Is the facility covered under a storm water permit? Does not need Coverage No, but may need to be (Refer to Regional Board)
 Individual General: Does the facility have a SWPPP? yes no

N/A = Not Applicable; PTNL = POTENTIAL for Pollutant Discharge: 1 = low potential, 2 = medium potential, 3 = high potential
 ACTUAL Type of Discharge: BMP: 0 = BMPs are effective, 1 = BMPs are fairly/almost effective, 2 = BMPs are not effective, 3 = No BMPs are implemented
 PEX = Pollutant Exposure, NSW = Non-Stormwater Discharge

| AREAS OF ACTIVITY | N/A | PTNL | ACTUAL Type of Discharge | | | REMARKS: Describe recommendations, requirements, and time to implement. Check box if remark is a requirement. |
|---|-----|------|--------------------------|-----|-----|--|
| | | | BMP | PEX | NSW | |
| A. Outdoor Process/Manufacturing Areas | | | | | | <input type="checkbox"/> |
| B. Outdoor Material Storage Areas | | 2 | 2 | | | <input checked="" type="checkbox"/> Numerous (14) fuel pump dispensers, (1) 5gal open paint container, broken glass full soda bottles stored outside in lot uncovered. |
| C. Outdoor Waste Storage/Disposal Areas | | 3 | 2 | X | X | <input checked="" type="checkbox"/> Large soil stockpile approx 12X20X42' uncovered |
| D. Outdoor Vehicle and Heavy Equipment Storage, Maintenance Areas | X | | | | | <input type="checkbox"/> |
| E. Outdoor Parking Areas and Access Roads | | 2 | 2 | | | <input checked="" type="checkbox"/> need to clean up litter, broken glass and any other spills by sweeping and other non-hose down methods. |
| F. Outdoor Wash Areas | X | | | | | <input checked="" type="checkbox"/> no washing. should direct or allow any non-stormwater discharges offsite. |
| G. Rooftop Equipment | X | | | | | <input type="checkbox"/> |
| H. Outdoor Drainage from Indoor Areas | | 1 | 1 | | | <input checked="" type="checkbox"/> dispose of mop water (if non-hazardous waste) into the sanitary sewer, not stormdrain. |
| I. Other (describe): | X | | | | | <input type="checkbox"/> |

COMMENTS/REMARKS/REQUIREMENTS Maintenance required in storm drain system yes no

site inspection to evaluate the potential for activities at a fuel station undergoing an apparent remodel/upgrade to impact stormwater which flows from this site during rainfall untreated into SF bay.

The following exposure issues were noted within the unsecured barrier fence surrounding the site:
 need to either cover dispensers - hoses noted above, store under cover or dispose
 need to either cover soil stockpiled above in lot so that it does not pose a stormwater (possible hazardous waste) runoff/removal issue.
 need to secure each of the above including paint and soda within 14 days by 12/7/99.

See attached for more comments.

PRIORITY FOR RE-INSPECTION: 1: First 2: Second 3: Third

ENFORCEMENT: None Verbal Notice Administrative Action Administrative Action w/ Penalty &/or Cost Recovery Legal Action

Warning Notice

Facility Representative: site currently unoccupied unattended. Inspector: Paul M. [Signature]

**Alameda Countywide Stormwater Program
Standard Stormwater Facility Inspection Report Form**

Municipality: SAN LEANDRO
 Date: 11/22/1999
 Inspector: P SMITH
 Facility has closed or info has changed

First Inspection Routine Inspection Response to Complaint Follow-up Follow-up date: 12/07/1999

Facility name: FREEDOM ARCO MINI MART

Address: 15101 FREEDOM AVE Suite:
 City: SAN LEANDRO State: CA Zip Code: 94578

Contact: M A PAZDEL Phone: 481-8162
 Business type: Gas Service Station SIC Code: 5541

Is the facility covered under any other programs or permits? (check all that apply) Retail food facility
 Air quality Hazmat business plan Underground storage tanks Sanitary sewer
 Fire Dept. Hazmat waste generator Above ground storage tanks Others

Is the facility covered under a storm water permit?
 Does not need coverage No, but may need to be (Refer to Regional Board)
 Individual General: Does the facility have a SWPPP? Yes No

N/A=Not Applicable; PTNTL=Potential for Pollutant Discharge; 1=low; 2=medium; 3=high; 9=unknown;
 ACTUAL Discharge Type: BMP: 0=effective; 1=fairly/almost effective; 2=not effective; 3=no BMPs implemented; 9=unknown
 PEX=Pollutant Exposure, NSW=Non-Stormwater Discharge

| AREAS OF ACTIVITY | N/A | PTNTL | ACTUAL | | | REMARKS |
|--|-----|-------|--------|-----|-----|--|
| | | | BMP | PEX | NSW | |
| A. Outdoor Process/Manufacturing Areas | X | | | | | |
| B. Outdoor Material Storage Areas | | 2 | 2 | | | NUMEROUS 14 FUEL PUMP DISPENSORS, (1) 5 GAL OPEN PAINT |
| C. Outdoor Waste Storage/Disposal Areas | | 3 | 2 | X | X | LARGE STOCKPILE APPROX 12X20X42 UNCOVERED. |
| D. Outdoor Veh/Heavy Eq. Storage, Maint. | X | | | | | |
| E. Outdoor Parking Area Access and Roads | | 2 | 2 | | | NEED TO CLEAN UP LITTER, BROKEN GLASS AND ANY OTHER |
| F. Outdoor Wash Areas | | 9 | 9 | | | NO WASHING SHOULD DIRECT OR ALLOW TO FLOW ANY |
| G. Rooftop Equipment Areas | X | | | | | |
| H. Outdoor Drainage from Indoor Areas | | 1 | 1 | | | DISPOSE OF MOP WATER (IF NON-HAZARDOUS WASTE) INTO |
| I. Other (describe): | X | | | | | |

Additional Comments/Remarks: Maintenance Required in Storm Drain System ? Yes No
 SITE INSPECTION TO EVALUATE THE POTENTIAL FOR ACTIVITIES AT A FUELSTATION UNDERGOING AN APPARENT REMODEL/UPGRADE TO IMPACT STORMWATER WHICH FLOWS FROM THIS SITE UNTREATED INTO SF BAY. THE FOLLOWING EXPOSURE ISSUES WERE NOTED WITHIN THE UNSECURED BARRIER FENCE SURROUNDING THE SITE: NEED TO EITHER COVER DISPENSORS & HOSES NOTED ABOVE, STORE UNDER COVER OR DISPOSE. NEED TO EITHER COVER SOIL STOCKPILED ABOVE IN LOT SO THAT IT DOES NOT POSE A STORMWATER (POSSIBLE HAZARDOUS WASTE) RUNON/RUNOFF ISSUE. NEED TO SECURE EACH OF THE ABOVE INCLUDING PAINT & SODA WITHIN 14 DAYS BY 12/7/99.

Priority for Re-inspection: First Second Third

Enforcement: Administration Action Administration Penalty
 Verbal Notice Warning Notice Informal Violation Formal Violation Legal Action

| COM No. | REMOTE STATION | START TIME | DURATION | PAGES | RESULT | USER ID | REMARKS |
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| 481 | ALA. CO. PWA-M&D | 11-19 10:06 | 00' 42 | 02/02 | OK | | |

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ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
 DAVID J. KEARS, Agency Director

November 17, 1999

ENVIRONMENTAL HEALTH SERVICES
 ENVIRONMENTAL PROTECTION
 1131 Harbor Bay Parkway
 Alameda, CA 94501-2577

STID 4473

Mr. Mohammed Pazdel
 35840 Alcazar Court
 Fremont, CA 94536

Mr. Rick Hirsch
 Service Station Properties
 640 So. Winchester Boulevard
 San Jose, CA 95128

Post-It™ brand fax transmittal memo 7671 # of pages > 2

| | |
|-----------------|------------------|
| To Paul Smith | From Scott Seery |
| Co. Clean Water | Co. ACDETH |
| Dept. | Phone # 567-6783 |
| Fax # 670-5251 | Fax # |

NOTICE OF VIOLATION

RE: 15101 Freedom Boulevard, San Leandro – Soil Stockpile Management

Dear Messrs. Pazdel and Hirsch:

This NOTICE OF VIOLATION is being issued for your collective failure to initiate proper stockpile management practices in preparation for and response to the onset of the rainy season. This large, uncovered soil stockpile represents a substantial threat to surface water runoff in the area of the site. Such uncovered soil piles and their consequent run-off are violations of the Alameda County Clean Water Program's National Pollution Discharge Elimination System (NPDES) permit.

At this time you are directed to immediately cover this soil pile in its entirety pending its lawful off-site disposal. Further, within 30 days, this soil pile must be removed and disposed of at a state-licensed landfill of the appropriate classification.

Please be advised that failure to comply with these directives will result in the referral of this case to the appropriate enforcement agency. Please be further advised that other agencies sharing jurisdiction over this and related issues may pursue other enforcement actions independent of those initiated by this office.

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

November 17, 1999

STID 4473

Mr. Mohammed Pazdel
35840 Alcazar Court
Fremont, CA 94536

Mr. Rick Hirsch
Service Station Properties
640 So. Winchester Boulevard
San Jose, CA 95128

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

NOTICE OF VIOLATION

RE: 15101 Freedom Boulevard, San Leandro – Soil Stockpile Management

Dear Messrs. Pazdel and Hirsch:

This NOTICE OF VIOLATION is being issued for your collective failure to initiate proper stockpile management practices in preparation for and response to the onset of the rainy season. This large, uncovered soil stockpile represents a substantial threat to surface water runoff in the area of the site. Such uncovered soil piles and their consequent run-off are violations of the Alameda County Clean Water Program's National Pollution Discharge Elimination System (NPDES) permit.

At this time you are directed to immediately cover this soil pile in its entirety pending its lawful off-site disposal. Further, within 30 days, this soil pile must be removed and disposed of at a state-licensed landfill of the appropriate classification.

Please be advised that failure to comply with these directives will result in the referral of this case to the appropriate enforcement agency. Please be further advised that other agencies sharing jurisdiction over this and related issues may pursue other enforcement actions independent of those initiated by this office.

I may be reached at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,

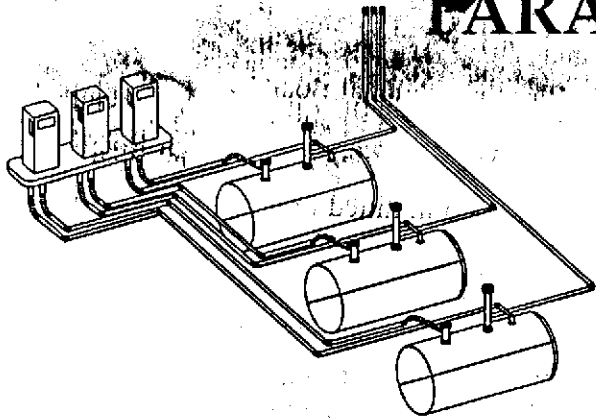
Scott O. Seery, CHMM
Hazardous Materials Specialist

Messrs. Pazdel and Hirsch
RE: 15101 Freedom Ave., San Leandro
November 17, 1999
Page 2 of 2

cc: Ariu Levi, Chief, Environmental Protection
Robert Weston, ACDEH
Chuck Headlee, RWQCB
Paul Smith, Alameda County Public Works, Clean Water Program
Nick Chimenko, Alameda County Fire Department

PARADISO MECHANICAL, INC.

GENERAL & PETROLEUM CONTRACTORS
and ENVIRONMENTAL SERVICES



P.O. BOX 1836
2600 WILLIAMS STREET
SAN LEANDRO, CA 94577

LICENSE NO. 677909
PHONE (510) 614-8390
FAX (510) 614-8396

November 12, 1999

Mr. Robert Weston
Alameda County Health Agency
Division of Hazardous Materials
Department of Environmental Health
1131 Harbor Bay Pkway.
Alameda, CA 94502

RE: Texaco Station 15101 Freedom Ave., San Leandro

Dear Mr. Weston:

This letter is to inform your agency that Paradiso Mechanical has stopped work at the above referenced site due to owner financial problems. We hope that our not continuing with the project will in no way reflect on our performance with your agency.

Once the issues have been resolved we will continue with the project and will need to renew our permits with your agency. If for some reason some other contractor tries to renew our permits please contact us at your earliest convenience.

We are notifying all permitting agencies that Paradiso Mechanical has not abandoned the project, just stopped work until we can resolve the problems.

Should you have any questions please contact Paul Paradiso or Dave Mordick at (510) 614-8390.

Sincerely,

David C. Mordick
Paradiso Mechanical

99 NOV 15 PM 4:30
ENVIRONMENTAL
PROTECTION

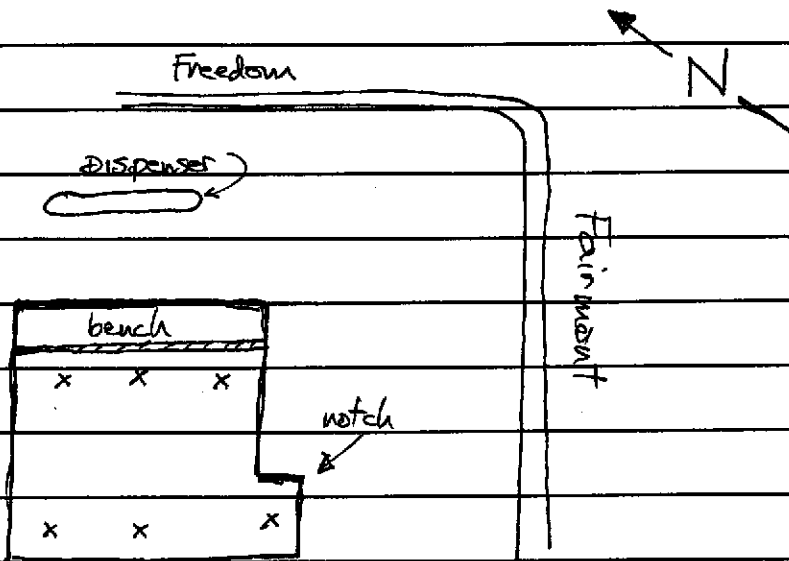
X 108

HAZARDOUS WASTE GENERATOR INSPECTION REPORT

| | | |
|----------------------------------|---|--------------------------|
| STD # <u>4473</u> <u>4115</u> | FACILITY NAME: <u>Freedom Area, 15101 Freedom Ave., S. Leandro</u> | PG. <u>1</u> OF <u>1</u> |
|----------------------------------|---|--------------------------|

SUPPLEMENTAL FORM

On-site for resampling of final excavation before new tanks are installed. Five (5) samples were collected from the deepened excavation (as shown below) and a 6th collected from the base of the southern "notch". The notch was ~~cut~~ cut to accommodate the largest of the new tanks



Total depth of the deepened excavation ranged from ~15.5 to 18.5' BG, shallower to the NE and deeper to the SW.

Product odor (mod. - strong) was noted in some sample locations, particularly at the shallower (NE) end of the excavation.

| | |
|--------------------------------|-------------------------------|
| PRINT NAME: <u>Joel Gregor</u> | INSPECTED BY: <u>S. Seery</u> |
| SIGNATURE: <u>Joel Gregor</u> | DATE: <u>6-21-99</u> |

HAZARDOUS WASTE GENERATOR INSPECTION REPORT

| | | |
|---------|---|--------------------------|
| STID #: | FACILITY NAME: <i>Freedom Area, 1501 Freedom, S. Leandro</i> | PG. <u>1</u> OF <u>1</u> |
|---------|---|--------------------------|

SUPPLEMENTAL FORM

On-site to witness continuation of piping trench sampling. Samples were collected from the base of the trenches below the former locations of elbows and "Ts." Eight (8) samples were eventually collected.

| | |
|--------------------------------|-------------------------------|
| PRINT NAME: <i>Joel Greger</i> | INSPECTED BY: <i>S. Seery</i> |
| SIGNATURE: <i>Joel Greger</i> | DATE: <i>5-21-99</i> |

HAZARDOUS WASTE GENERATOR INSPECTION REPORT

STID #: 4473 FACILITY NAME: 15101 FREEDOM AVE S.L PG. 2 OF 2

SUPPLEMENTAL FORM

REPLACED SOS ON SITE TO WITNESS REMOVAL OF LAST OF THREE SW STEEL TANKS. NO APPARENT HOLES IN THE TANK. HOWEVER OBSERVED DISSOLVED TAP WRAPPING AT FILL END. OBVIOUS OVERSPILLAGE HAS CAUSED DAMAGE TO WRAP. POSSIBLE SOURCE OF STRONG ODORS IN PIT SOIL. SUBSURFACE VERY CLAYEY, HEAVY BLACK. BACKFILL SANDEY.

TANK PIT SAMPLED AFTER ALL TANKS REMOVED. NO H₂O IN THE PIT. VERY STRONG ODORS MADE WORSE WITH EACH BUCKET REMOVED.

TWO SAMPLES FROM EACH END OF THREE TANKS. RESULTS TO BE KNOWN MONDAY 5-25-99.

STOCKPILE SOIL TO BE ANALYZED PRIOR TO MOVEMENT AND DISPOSAL TO FORWARD LANDFILL.

EXPOSED PIPING TRUNCATE SAMPLED TODAY P-1 - P-7.

MORE PIPING TO BE UNCOVERED FRIDAY.

PRINT NAME:

INSPECTED BY:

SIGNATURE:

DATE:

5-20-99

HAZARDOUS WASTE GENERATOR INSPECTION REPORT

| | | |
|------------------------|---|--------------------------|
| STID #: <u>4473</u> | FACILITY NAME: <u>Freedom Arco, 15101 Freedom Ave., S. Leandro</u> | PG. <u>1</u> OF <u>2</u> |
|------------------------|---|--------------------------|

SUPPLEMENTAL FORM

8:30 AM On-site to gauge progress / schedule of UST removals.

USTs were reportedly "triple-rised" the day before, and an air aducter was being employed to speed air turn-over in the tanks prior to addition of CO₂ pellets. Significant gasoline odors were evident in the tank pit, as was heavily stained backfill.

Fire Department not present during closures

~ 11:00 AM - On-site for closures. "OK" was given to remove USTs once LEL was $\leq 3\%$ in each tank, although O₂ was still just below ambient. 500 lbs CO₂ pellets were placed in tanks, ensuring continued inertness while being transported off-site.

① South tank - Appears intact, 98% of tar coating in place. Tar is missing, however, around the fill and pump end of tank at its top.

② Center tank - A significant amount of tar wrapping was absent from the entire length of the tank top. ~~throughgoing corrosion hole was observed @ the bottom fill-end of tank.~~ Other deep corrosion pits were also noted in the same area.

PRINT NAME:

INSPECTED BY:

S. Seery

SIGNATURE:

DATE:

5-20-99

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIVISION
1131 HARBOR BAY PARKWAY, RM 250
ALAMEDA, CA 94502-6577
PHONE # 510/567-6700
FAX # 510/337-9335

Project Specialist

ACCEPTED

Underground Storage Tank Closure Permit Application
Alameda County Division of Hazardous Materials
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

These closure/removal plans have been received and found to be acceptable and essentially meet the requirements of State and Local Health Laws. Changes to your closure 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/instruction.

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

Any changes 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. Notify this Department at least 72 hours prior to the following required inspections:

Removal of Tank(s) and Piping
 Sampling
 Final Inspection

Issuance of a) permit to operate, b) permanent site closure, is dependent on compliance with accepted plans and all applicable laws and regulations.

THERE IS A FINANCIAL PENALTY FOR NOT OBTAINING THESE INSPECTIONS.

Contact Specialist

Robert Weston
5-5-99

UNDERGROUND TANK CLOSURE PLAN

* * * Complete according to attached instructions * * *

- Name of Business SERVICE STATION PROPERTIES
Business Owner or Contact Person (PRINT) RICK HIRSCH
- Site Address 15101 FREEDOM BLVD
City SAN LEANDRO Zip 94578 Phone _____
- Mailing Address 640 S. WINCHESTER BLVD
City SAN JOSE Zip 95128 Phone 408/5512910
- Property Owner SERVICE STATION PROPERTIES, LLC
Business Name (if applicable) _____
Address 640 S. WINCHESTER BLVD
City, State SAN JOSE Zip 95128
- Generator name under which tank will be manifested
SERVICE STATION PROPERTIES, LLC
EPA ID# under which tank will be manifested CA L000207307

6. Contractor PARADISO MECHANICAL
Address 2600 WILLIAMS ST.
City SAN LEANDRO Phone 510/614 8390
License Type A, B, C, D, C61/D23, HAZ ID# 677909

*Effective January 1, 1992, Business and Professional Code Section 7058.7 requires prime contractors to also hold Hazardous Waste Certification issued by the State Contractors License Board.

7. Consultant (if applicable) N/A
Address _____
City, State _____ Phone _____

8. Main Contact Person for Investigation (if applicable)
Name TBD Title _____
Company _____
Phone _____

9. Number of underground tanks being closed with this plan 3
Length of piping being removed under this plan 250' APPROX.
Total number of underground tanks at this facility (**confirmed with owner or operator) 3

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

** Underground storage tanks must be handled as hazardous waste **

a) Product/Residual Sludge/Rinsate Transporter
Name ECI EPA I.D. No. CAD009446392
Hauler License No. 019 License Exp. Date _____
Address 255 PARR BLVD
City RICHMOND State CA Zip 94801

b) Product/Residual Sludge/Rinsate Disposal Site
Name ROMIC CHEMICAL EPA ID# CAD009452657
Address 2081 BAY RD.
City PALO ALTO State CA Zip 94303

c) Tank and Piping Transporter

Name ECI EPA I.D. No. CAD009466392
Hauler License No. 019 License Exp. Date _____
Address 255 PARR BLVD
City RICHMOND State CA Zip 94801

d) Tank and Piping Disposal Site

Name ECI EPA I.D. No. CAD009466392
Address 255 PARR BLVD
City RICHMOND State CA Zip 94801

11. Sample Collector

Name JOEL GREGER
Company GEO. LOGIC
Address 1140 5TH AVE.
City CROCKETT State CA Zip 94525 Phone 510/7876867

12. Laboratory

Name CAL COAST ANALYTICAL
Address 4072 WATTS ST.
City EMERYVILLE State CA Zip 94608
State Certification No. 1236

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

If yes, describe. _____

14. Describe methods to be used for rendering tank(s) inert:

50 LBS OF DR. ICE PER 1,000 GALLONS OF TANK CAPACITY

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 permanently plugged.

The Bay Area Air Quality Management District, 415/771-6000, along with local Fire and Building Departments, must also be contacted for tank removal permits. Fire departments typically require the use of a combustible gas indicator to verify tank inertness. It is the contractor's responsibility to bring a working combustible gas indicator on-site to verify that the tank is inert.

15. Tank History and Sampling Information *** (see instructions) ***

| Tank | | Material to be sampled (tank contents, soil, groundwater) | Location and Depth of Samples |
|----------|--|---|--|
| Capacity | Use History include date last used (estimated) | | |
| 10,000 | UNLEADED FUEL ↓ | SOIL &/OR GROUNDWATER ↓ | AT EACH END & MIDDLE @ BACKFILL/NATIVE SOIL INTERFACE OR AS DIRECTED BY THE INSPECTOR |
| 10,000 | | | |
| 10,000 | | | |

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

Excavated/Stockpiled Soil

| | |
|--|-----------------------------|
| <p>Stockpiled Soil Volume (estimated)</p> | <p>Sampling Plan</p> |
|--|-----------------------------|

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

Will the excavated soil be returned to the excavation immediately after tank removal? [] yes [] no [] unknown

If yes, explain reasoning _____

If unknown at this point in time, please be aware that excavated soil may not be returned to the excavation without prior approval from Alameda County. This means that the contractor, consultant, or responsible party must communicate with the Specialist **IN ADVANCE** of backfilling operations.

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.

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

| Contaminant Sought | EPA or Other Sample Preparation Method Number | EPA or Other Analysis Method Number | Method Detection Limit |
|--------------------|---|-------------------------------------|------------------------|
| MTBE | (AS REQUIRED IN TABLE 2) | 8260 | |

18. Submit Worker's Compensation Certificate copy

Name of Insurer INDUSTRIAL INDEMNITY

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 written report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report (ULR) form.

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

23. Submit State (Underground Storage Tank Permit Application) Forms A and B (one B form for each UST to be removed) (mark box 8 for "tank removed" in the upper right hand corner)

I declare that to the best of my knowledge and belief that 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 approval from the Environmental Protection Division 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.

CONTRACTOR INFORMATION

Name of Business PARADISO MECHANICAL, INC

Name of Individual TRACY LUM

Signature *Tracy Lum* Date 4/20/99

PROPERTY OWNER OR MOST RECENT TANK OPERATOR (Circle one)

Name of Business SERVICE STATION PROPERTIES

Name of Individual RICK HIRSCH

Signature *Rick Hirsch* Date 4/20/99

S I T E H E A L T H

&

S A F E T Y P L A N

SERVICE STATION PROPERTIES

15101 FREEDOM

SAN LEANDRO, CA

PARADISO PROJECT #99-444

EMERGENCY INFORMATION

IN CASE OF AN EMERGENCY, USE THIS SHEET

EMERGENCY PHONE NO:

911

SITE ADDRESS:

SERVICE STATION PROPERTIES
15101 FREEDOM
SAN LEANDRO, CA

SITE LOCATION

(SEE ATTACHED MAP)

C O N T E N T S

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1.0 INTRODUCTION

This Health & 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 various work performed at the site, as well as health and safety hazards associated with each task.

2.1 SITE SECURITY

Access during all on-site activities will be restricted to authorized personnel. All personnel and authorized visitors must contact the Site Foreman/Safety Coordinator prior to entering and exiting the site.

3.0 ON-SITE ORGANIZATION

Each person shall be responsible for following the Health and Safety Plan's guidelines at the site. The Safety Officer is the appointed Foreman and his duties are as follows:

- Ensure that the Health and Safety Plan is implemented;
- Conduct "tailgate" meetings on a weekly basis and document items discussed;
- Conditions may change on site. Determine extent and conduct "tailgate" meetings on a basis that relates to conditions on site. Document items discussed.
- Stop work if the health and safety of workers is in question;
- Observe workers for signs and symptoms of exposure or heat stress;
- 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 health and safety practices;
- Perform daily review of the work practices and compliances with this Health and Safety Plan;

- Determine exclusion zones and assign personnel duties at each zone in case of an emergency;
- 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 this 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, Safety Coordinator 510-614-8390
 Paradiso Mechanical, Inc.
 San Leandro, CA 94577
- PAUL PARADISO, Project Manager 510-614-8390
 Paradiso Mechanical, Inc.
 San Leandro, CA 94577

HEALTH AND SAFETY HAZARDS

Health and safety concerns on site may consist of:

- Chemical hazards:
 - Diesel, Gasoline, Benzene, Toluene, Ethyl Benzene and Xylenes.
- Physical hazards:
 - Operation of heavy equipment;
 - Semi-Trucks/Automobiles and other vehicle traffic;
 - Excavation pits/trenches;
 - Underground electrical, water and sewer lines.

3.3 HAZARD ANALYSIS

To the best of our knowledge, the property previously operated gasoline, diesel, and waste oil tanks. Historic data and evaluation of subsurface data indicates the presence of elevated levels of petroleum hydrocarbons.

3.4 EXPOSURE PREVENTION AND SAFETY REQUIREMENTS

This section describes the hazard and danger of exposure to chemicals and physical hazards present at the site. Possible

contingency plans and safety requirements are also presented on this section.

3.4.1 HAZARD EXPOSURE GUIDELINES

| Substances | CAL OSHA PEL | 1990-91 ZSVHOJ/ TLV |
|--------------------------|----------------------------------|----------------------------------|
| Benzene | 1 ppm (TWA) 25 ppm (Ceiling) | 1 ppm (TWA) |
| Toluene | 100 ppm (TWA) 150 ppm (STEL) | 100 ppm (TWA) 150 ppm (STEL) |
| Ethylbenzene | 100 ppm (TWA) 125 ppm (STEL) | 100 ppm (TWA) 125 ppm (STEL) |
| Xylene | 100 ppm (TWA) 150 ppm (STEL) | 100 ppm (TWA) 150 ppm (STEL) |
| Gasoline | 300 ppm (TWA) 500 ppm (STEL) | 300 ppm (TWA) 500 ppm (STEL) |
| Oil Mist | 5 mg/m3 (TWA) 10 mg/m3 (STEL) | 5 mg/m3 (TWA) 10 mg/m3 (STEL) |
| Petroleum Distillates | 400 ppm (TWA) | 400 ppm (TWA) |

3.4.2 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, seek medical aid immediately.

B. Internal exposure hazards: Harmful if swallowed.

In case of exposure:

- Seek medical attention;

- 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.

3.4.3 TRAFFIC HAZARDS

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

- 1) Keep equipment in sight at all times;
- 2) Inform the operator of your location at all times.

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 vehicles will be allowed to enter the barricaded area.

3.4.4 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.

3.4.5 UNDERGROUND POWER LINE HAZARDS

Call U.S. Alert at least 3 days before commencing excavation work. The owner will identify aboveground structures and utilities and will provide as-built blueprints for contractor use prior to start of project. 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 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, mechanical and electrical equipment.
- Call Utility Company/U.S. Alert immediately.
(U.S. Alert - 1-800-642-2444)

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 currents.

3.4.6 PERSONNEL 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 come 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.

3.4.7 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)

Each company vehicle is equipped with the following items:

- First Aid Kit
- Fire Extinguisher
- "Stop/Slow" traffic signs
- Warning Triangle/Flare Kit

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 an experienced supervisor.
- Eight hours of annual classroom refresher training.
- Eight hours of supervisory training if a team member is a designated supervisor.
- Hazard communications 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 this 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 work zone based on anticipated hazards. Specific protective equipment requirements are as follows:

- Exclusion zone - Level D protection will be required within the exclusion zone for any workers engaged in sample collection or other activities on site. Level D protection will include a hard hat, steel-toed boots, safety glasses, hearing protection, and Nitrile gloves. Coveralls are optional but recommended.
- Level C protection will be required if PID readings exceeding 100 ppm total volatile organics over background concentration are recorded in the workers breathing zone. Level C protection will consist of disposable Tyvek coveralls, steel-toed boots, chemical resistant boot covers, splash goggles, chemical resistant disposable gloves (inner) and chemical resistant outer gloves. MSHA/NIOSH approved half-face or full face air-purifying respirator with dual organic vapor cartridges.
- Support Zone - No specific requirements.

6.0.1

ASBESTOS

Protective Clothing: Whenever there is a need for removing material containing asbestos, Contractor shall provide the following protective clothing or equipment and respirators.

- Full body disposable coveralls;
- Disposable shoe covers & hood;
- Impermeable gloves;
- Approved half mask or full face respirator with HEPA filter cartridge as a minimum;
- All protective clothing shall be handled and disposed in accordance with the applicable laws.

Asbestos Caution signs shall be displayed at all entrances to the work area in accordance with applicable laws.

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 at all times. More serious injuries may require assistance from paramedics. The Field Foreman or another designated person will contact the appropriate emergency personnel by dialing 911. Field Foreman or another designated person will contact the Safety Coordinator immediately following contact of medical personnel.

9.0 EMERGENCY PHONE NUMBERS

HOSPITAL LOCATIONS ON NEXT PAGE

SAN LEANDRO HOSPITAL
13855 E. 14TH STREET
SAN LEANDRO, CA 94578
510/357-6500

| | |
|-------------------|----------|
| 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
510 271-4320

Regional Water Quality Control Board
510 286-1255

Bay Area Air Quality Management District
415-771-6000

Environmental Protection Agency
415-974-8076

Chemtrec
800-424-9300

Department of Transportation
510 286-4444

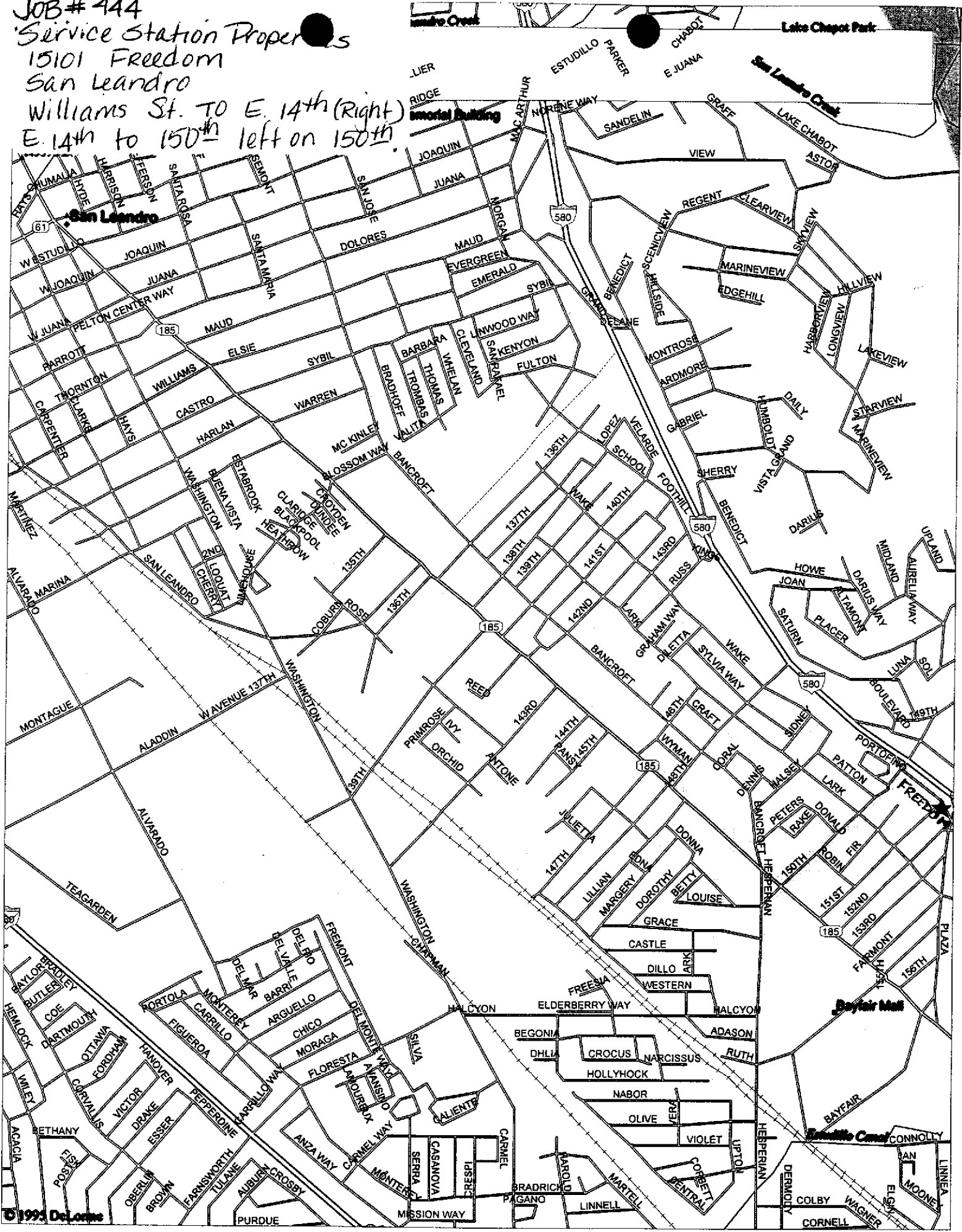
U.S. Alert Services
800-642-2444

INSERT HOSPITAL/SITE MAP

TO WHOM IT MAY CONCERN:

PARADISO MECHANICAL, INC. 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.

JOB # 444
Service Station Properties
15101 Freedom
San Leandro
Williams St. TO E. 14th (Right)
E. 14th to 150th left on 150th





August 20, 1990

Freedom Arco
15101 Freedom Ave.
San Leandro, CA 94578

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

RE: 15101 Freedom Ave.

FINAL NOTICE OF VIOLATION

Dear owner/operator:

Our records indicate that there are underground tank(s) at your site at the above facility. You have been notified of the below violations and you have not yet corrected them.

In accordance with the California Code of Regulations, Title 23, Chapter 3, Subchapter 16 Underground Tank Regulations you must perform one of the following actions:

1. Submit a tank closure plan to this Department as required by Article 7, 2670, forms available from this office, or
2. Apply for a permit as required by Article 10, 2710. Permit applications Part A and B are available from this office.

Please note that section 25299 of the California Health and Safety Code states that any operator or owner of an underground storage tank is liable for a civil penalty of not less than five hundred dollars or more than five thousand dollars per day for failure to obtain a permit, or failing to properly close an underground storage tank, as required by section 25298.

If you have any questions concerning this matter, please contact this office at 271-4320.

Sincerely,

Thomas F. Peacock, Senior HMS
Hazardous Materials Division

TFP:tfp

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Lester Feldman, RWQCB

ALAMEDA COUNTY, DEPARTMENT OF
ENVIRONMENTAL HEALTH COUNTY
Hazardous Materials Inspection Form

white -env.health
yellow -facility
pink -files

II, III

Site ID # _____ Site Name Mr. Pazdel Freedom Arco Today's Date 2/3/90

Site Address 15101 Freedom Ave.
City San Leandro Zip 94578 Phone 481-8162 234-7801 ^{land} _{land}

II.A BUSINESS PLANS (Title 19)

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

II.B ACUTELY HAZ. MATLS

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

___ 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

no HMMP

* 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
 - ___ 6. Method
 - 1) Monthly Test
 - 2) Daily Vadose
 - Semi-annual groundwater
 - One time soils

Comments:

- ① 3 Tanks, 10,000 GL each
super unleaded } steel
Reg unleaded } single
Reg leaded } tanks
- ② 15+ years old (owner estimate)
- ③ Records of soil testing by purchaser of real estate 11/1989 by "Tank Product Engineering" (415) 429-8088 all clean 69ppb benzene highest found
- ④ Testing by "United Soil Engineering" Nov. 89. Two GW wells soil test 0.1ppm benzene in soil (action level 0.07ppm) all others v. low.
- ⑤ Tank test records not at station
- ⑥ UG tank permit applications not at station.
- ⑦ Inventory reconciliation paperwork more than 1 month behind time.
- ⑧ Last tank test records on hand dated 11/23/88. (Tanks OK). II, III

Call in to Jerry Ferdinand
 670-5853
 Fire Prev. Chief
 Edison Fire Dist 670-5853
 9-20-90 W.F.F.
 for info on 15101 Freedom
 or 1732 151st St

Title: Owner Business

Signature: M.A. Pazdel

Inspector: William F. Faulhaber

Signature: William F. Faulhaber

Site Brief for **U N D E R G R O U N D T A N K S**
for the City of Alameda

as of 12/28/90

pg 1

| UTID/ Status | Name of Site | Site Address | #Tanks | PERMITS: |
|-----------------------------|-----------------------------|--|--------|---------------------------------|
| BillID | ===== | ===== | ===== | ===== |
| -0- T61043 | C Arco Station #02112 | 1260 Park St. Alameda, CA 94501 | 5 | I:09/06/88 F:-0- |
| 784 T61043 | C Arco Station #02035 | 1001 San Pablo Ave. Albany, CA 94706 | 4 | I:09/06/88 F:-0- |
| 658 T61043 | C Arco Station #04977 AM/PM | 2770 Castro Valley Blvd. Castro Valley, CA 94546 | 3 | I:09/06/88 F:07/05/88 |
| -0- T61043 | C Arco Station #02152 | 22141 Center St. Castro Valley, CA 94546 | 3 | I:09/06/88 F:-0- |
| *1053 T61043 | C Arco Station #06041 | 7249 Village Pkwy. Dublin, CA 94568 | 4 | I:09/06/88 F:-0- |
| *813 T10115 | C Arco K&V Gas Foodmart | 6211 San Pablo Ave. Emeryville, CA 94608 | 3 | I:-0- F:-0- |
| I * T61043 | C Arco Station #05387 | 20200 Hesperian Blvd. Hayward, CA 94541 | 4 | I:09/06/88 F:-0- |
| *0- T21120 | C Airport Arco | 20450 Hesperian Blvd. Hayward, CA 94541 | 3 | I:02/03/89 F:-0- |
| * 2112 T42311 | C Springtown Arco | 909 Bluebell Dr. Livermore, CA 94550 | 3 | I:-0- F:-0- |
| -0- T61043 | C Arco Station #00771 | 899 Rincon Ave. Livermore, CA 94550 | 5 | I:09/06/88 F:-0- |
| 198 T61026 | R Wong's Arco | 2032 E. - 12th St. Oakland, CA 94606 | 0 | I:-0- F:-0- |
| *-0- T61043 | C Arco Station #02185 | 9800 E. - 14th St. Oakland, CA 94603 | 4 | I:09/06/88 F:-0- |
| 1130 TA1036 | C Freeway Arco | 2740 - 98th Ave. Oakland, CA 94605 | 4 | I:10/13/87 F:-0- |
| -0- T61043 | C Arco Station #02169 | 889 W. Grand Ave. Oakland, CA 94607 | 5 | I:09/06/88 F:-0- |
| *-0- -0- | R Gin's Arco Service | 706 Harrison St. Oakland, CA 94612 | 0 | I:-0- F:-0- |
| -0- T61043 | C Arco Station #04494 | 566 Hegenberger Rd. Oakland, CA 94621 | 3 | I:02/05/88 F:-0- |
| *1038 T21043 | C High St. Arco | 2951 High St. Oakland, CA 94619 | 5 | I:02/05/88 F:-0- |
| -0- T61043 | C Arco Station #04931 | 731 W. MacArthur Blvd. Oakland, CA 94609 | 4 | I:09/06/88 F:-0- |
| -0- T61043 | C Arco Station #00276 | 10600 MacArthur Blvd. Oakland, CA 94605 | 3 | I:09/06/88 F:-0- |
| 851 T41043 | C Mountain Blvd. Arco | 2844 Mountain Blvd. Oakland, CA 94602 | 4 | I:04/14/88 F:-0- |
| -0- T61043 | C Arco Station #02107 | 3310 Park Blvd. Oakland, CA 94610 | 3 | I:09/06/88 F:-0- |
| -0- T61043 | C Arco Station #06002 | 6235 Seminary Ave. Oakland, CA 94605 | 4 | I:09/06/88 F:-0- |
| -0- T61043 | C Arco Station #06148 | 5131 Shattuck Ave. Oakland, CA 94609 | 3 | I:09/06/88 F:-0- |
| -0- T61043 | C Arco Station #00374 | 6407 Telegraph Ave. Oakland, CA 94609 | 3 | I:09/06/88 F:-0- |
| ? -0- -0- | F Freedom Arco | 15101 Freedom Ave. San Leandro, CA 94578 | 3 | I:-0- F:-0- |
| 1794 T81053 | C Tharco | 2222 Grant Ave. San Lorenzo, CA 94580 | 1 | I:08/16/88 F:-0- |
| 779 T61043 | C Arco Station #00608 | 17601 Hesperian Blvd. San Lorenzo, CA 94580 | 4 | I:09/06/88 F:-0- |