

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



2-9-03

December 9, 2003

Mr. Bo Gin
342 Lester Ave.
Oakland, CA 94606

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

Dear Mr. Gin:

Subject: Fuel Leak Case RO0000484, 706 Harrison St., Oakland, CA 94607

Alameda County Environmental Health, Local Oversight Program (LOP) staff has received and reviewed the December 1, 2003 Third Quarter 2003 Monitoring Report for the referenced site prepared by Cambria Environmental Technology, Inc. Please address the following technical comments when performing the requested work at your site.

TECHNICAL COMMENTS

- Cambria has proposed to postpone submittal of a work plan to further characterize the site and has alternatively proposed to prepare a work plan for the collection of soil vapor samples. Please be informed that confirmation sampling (soil and groundwater, where appropriate) is still required to document post-remediation residual concentrations. These concentrations shall be used in your site-specific human health risk assessment. Soil vapor sampling cannot replace confirmation sampling. Soil vapor samples are taken after the evaluation of residual soil and groundwater sample results indicate potential excess human health risk due to this exposure pathway.
- The work plan proposal for providing hydrogeologic cross-sections, a hydrocarbon removal mass estimate and a subsurface utility survey has previously been approved.

TECHNICAL REPORT REQUEST

- January 16, 2004- Work plan for confirmation soil and groundwater sampling and soil vapor sampling (if appropriate)

Please contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, D. Drogos, files

Mr. Matt Meyers, Cambria Environmental, 5900 Hollis St., Emeryville, CA 94608

Mr. R. Kitay, ASE, 208 W. Pintado, Danville, CA 94526

Mr. S. Ramdass, SWRCB Cleanup Fund, 1001 I St., 17th Floor, Sacramento, CA 95814-2828

Mr. Kin Chan, 4328 Edgewood Ave., Oakland, CA 94602

Ms. Susan Chan-Barba, 242 California Ave., San Leandro, CA 94577

706Harrison12_09_03

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



02-2703

February 25, 2003

Mr. Bo Gin
288 11th St.
Oakland, CA 94607

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

Dear Mr. Gin:

Subject: Fuel Leak Site RO0000484, 706 Harrison St., Oakland, CA 94607

Our office has recently reviewed the case file for the subject site and have spoke with Mr. Sunil Ramdass of the Underground Storage Tank Cleanup Fund (Fund) and Mr. Meyers of Cambria Environmental regarding proposed future site activities. Additional information is necessary to progress your site towards case closure. Please address the following technical comments when performing the requested work at your site.

Technical Comments

1. It is appropriate to reduce the monitoring frequency to semi-annual (first and third quarters) in those wells, which have shown decreasing petroleum concentrations ie MW-3, MW-5, MW-6 and MW-7. The other three wells should be monitored quarterly, but their results can be included in the following semi-annual reports. We request that you also attempt to sample groundwater from VW/SP-3 and VW/SP-4 at least on a one-time basis. You may make recommendations to continue or stop sampling after reviewing the initial sampling results.
2. Because the air sparge system does not extend into the area of the presumed highest impacted groundwater (MW-2), it is not recommended to continue air sparging unless groundwater contamination remains within the southwest tank pit.
3. The area of the former 6K gasoline tank appears to be a source of residual groundwater contamination, therefore, we request that several grab groundwater samples be collected within the former UST tank pit. This area, though it may be impacted from the neighboring site, 726 Harrison St., appears to also have significant groundwater contamination of its own. Should groundwater require remediation within this area, we request that you discuss remediation options with the consultant for 726 Harrison St., given the similarity in sites and site conditions. I understand from your consultant, they are also considering taking vapor samples.
4. As earlier requested, please perform a utility and sensitive receptor survey. You should wait before performing your human health risk assessment to complete site characterization and to incorporate the most current analytical data.

Technical Report Request

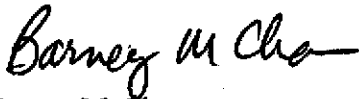
Please submit the following report according to the following schedule

- March 25, 2003-work plan for further characterization of both former gasoline tank pits, confirmation of groundwater monitoring schedule and utility and sensitive receptor survey.

Mr. Bo Gin
RO0000484
706 Harrison St., Oakland, CA 94607
February 25, 2003
Page 2

Please contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. Matt Meyers, Cambria Environmental, 5900 Hollis St., Emeryville, CA 94608

Mr. K. Chan, 4328 Edgewood Ave., Oakland, CA 94602

Ms. Susan Chan-Barba, 242 California Ave., San Leandro, CA 94577

Mr. R. Kitay, ASE, 208 W. Pintado, Danville, CA 94526

Mr. S. Ramdass, SWRCB Cleanup Fund, 1001 I St., 17th Floor, Sacramento, CA 95814-2828

706Harrisonwp

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



04-16-02

April 15, 2002
RO0000484

Mr. Bo Gin
288 11th St.
Oakland, CA 94607

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

Re: Fuel Leak Site RO0000484, 706 Harrison St., Oakland, CA 94607

Dear Mr. Gin:

This letter recounts items discussed during our meeting on April 12, 2002 with you, Mr. Ron Scheele of Cambria Environmental and myself. As pointed out in the latest Cambria groundwater monitoring report, a trend of declining petroleum concentration has been observed in previously impacted wells at this site. The exact cause of this decline is not completely understood. To further the site towards closure, we discussed a number of items, which I have listed below and augmented.

Technical Comments:

1. A formal human health risk assessment should be prepared. This should include an evaluation of all past soil and groundwater data and an evaluation of all potential exposure pathways. All chemicals of concern (COC) should be evaluated including MTBE and TPHg. If this evaluation indicates a potential unacceptable human health risk, you should provide a work plan for additional sampling of the appropriate media (soil, groundwater and/or air). We discussed potential soil re-sampling and depth discrete soil vapor sampling.
2. You are referred to my December 20, 2000 letter. Our office again requests you to provide an estimate of the mass (pounds) of the original release to soil and groundwater and a compare this against that which was removed by your remediation system. It is understood that this does not account for the additional bio-remediation that has occurred as a result of air sparging that continues at the site.
3. As previously requested by Mr. Seto of our office, please perform a sensitive receptor survey and conduit study for your site.
4. Quarterly groundwater monitoring should continue and the concentration trend observed. Please include the analysis of the additional chemicals, TAME, ETBE, DIPE, TBA, EDB and EDC, which may be included in an EPA Method 8260 analysis.

We recognize that site closure may be difficult without active remediation occurring at 726 Harrison St.. I informed you that steps are underway to propose a remediation system there. You are encouraged to review the files for their site or contact their consultant at Aqua Science Engineers. If possible, groundwater sampling should be coordinated and cross-sectional diagrams made including both sites.

Mr. Bo Gin
RO0000484
706 Harrison St., Oakland, CA 94607
April 15, 2002
Page 2

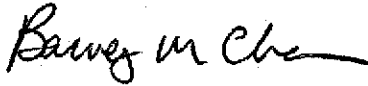
Technical Report Request

Please submit the following reports according to the following schedule:

- May 15, 2002- human health risk assessment and if necessary a work plan for additional site investigation

If you have any questions, please contact me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. R. Scheele, Cambria Environmental, 1144 65th St., Suite B, Oakland, CA 94608
Mr. K. Chan, 4328 Edgewood Ave., Oakland, CA 94602
Mr. R. Kitay, ASE, 208 W. El Pintado, Danville, CA 94526

706 Harrison

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



12-21-00

20484

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

December 20, 2000
StID # 3749

Mr. Bo Gin
288 11th St.
Oakland CA 94607

Re: Former ARCO Station, 706 Harrison St., Oakland CA 94607

Dear Mr. Gin:

I have reviewed the case files for your site and that of the neighboring sites at 800 Harrison St. and 726 Harrison St. I have also reviewed your consultant's Remediation System Operation Report and System Shutdown Request dated October 11, 2000. At this point, our office does not have enough information to concur with your consultant's recommendation. It appears that Cambria is suggesting that the site has reached a "low risk groundwater case" status as defined in the San Francisco Regional Water Quality Control Board (SFRWQCB) Supplemental letter to the Bay Area agencies.

Your consultant has been requested to submit a receptor survey, a conduit study and concentration versus time curve for the on-site wells in Mr. Seto's November 28, 2000 letter. Risk has been evaluated by your consultant, who has compared the highest benzene concentration in well MW-2 against the City of Oakland Tier 2 Site Specific Target Level (SSTL) for Merritt sands. This comparison concludes there is no potential risk to human health through vapor inhalation of indoor air in a commercial setting.

To further support your consultant's request for system shutdown please address the following additional concerns:

- The Cambria report states that approximately 1871 pounds of hydrocarbons has been removed from extraction system over the period of operation. Please provide an estimate of the amount in pounds of the original hydrocarbon release (to soil and groundwater) so as to be able to estimate the amount remaining on-site.
- Figure A in the Cambria report shows a plot of TPH concentration in air and total pounds of hydrocarbon removed over time. However, if you look at the same type of plot using the TPH concentration in groundwater, there is very little effect seen as a result of the remediation. Doesn't this indicate significant residual TPH exists at the site?
- The human health risk evaluation did not evaluate residual subsurface soil concentrations. Original soil results within the former tank pit showed elevated benzene concentrations in soil. Will there be any attempt to take confirmation soil samples to demonstrate contaminant concentration reduction?
- Figure A indicates asymptotic removal concentrations with the current system, however, given the elevated concentrations seen in MW-1 and MW-2, are there modifications to the system that can be done to remediate contamination in these areas?

Mr. Bo Gin
StID # 3749
Former ARCO, 706 Harrison St., Oakland 94607
December 20, 2000
Page 2.

- The Oakland RBSLs are human health protective while the SFRWQCB RBSLs are protective of human health, ecological health and other nuisance conditions. It is, therefore, important to look at all potential exposure pathways and all chemicals of concern to come up with the most appropriate cleanup numbers. Benzene concentration in groundwater may not be the chemical driving the cleanup. Please examine all exposure pathways, all chemicals of concern and their cleanup level. To this end, our office is not convinced that all MTBE on your site has originated from an off-site source. Concentration trends of this chemical are not consistent with this theory. Therefore, please include an evaluation of MTBE cleanup requirements in your risk evaluation.

Please have your consultant contact me should you have any questions regarding this letter or wish to have a meeting. A written response to this letter is requested within 45 days or no later than February 2, 2001. I may be reached at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
R. Scheele, Cambria Environmental, 1144 65th St., Suite B, Oakland 94608
Mr. K. Chan, 4328 Edgewood Ave., Oakland CA 94602
Mr. R. Kitay, ASE, 208 W. El Pintado, Danville, CA 94526

Stat706Harrison

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



11-29-00

20484

November 28, 2000

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

Mr. Bo Gin
288 11th Street
Oakland, CA 94607
STID 3749

RE: Former Arco Station, 706 Harrison Street, Oakland, CA 94607

Dear Mr. Gin:

I have reviewed your Remediation System Operation Report and System Shutdown Request dated October 11, 2000 with Mr. Barney Chan. I have been transferred to another position within my office, and Mr. Chan is the new caseworker for this site. Before a decision can be made on your request to discontinue active remediation (air sparging) and to remove the remediation system from the site, Mr. Chan would like to review with the site file more closely along with the site files of 726 Harrison and 800 Harrison Street, Oakland.

To assist this office in evaluating your site for closure, please submit a receptor survey, a conduit study and concentration (contaminates) vs. time curves for the on-site wells.

If you have any questions, please contact me at (510) 567-6774 or Barney Chan at (510) 567-6765.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Ron Scheele, Cambria Environmental, 1144 65th Street, Suite B, Oakland,
CA 94608
Barney Chan, Alameda County Environmental Health
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



*Sent 2/3/00
Including cc's*

po484

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

February 2, 2000

Mr. Bo Gin
288 11th Street
Oakland, CA 94607
STID 3749

RE: Former Arco Station, 706 Harrison Street, Oakland, CA 94607

Dear Mr. Gin:

During our phone conversation today, you addressed my concern of a possible MTBE source at the above property. You informed me that your only supplier of gasoline, Arco informed you that they did not put MTBE in their gasoline until 1994-1995. The underground storage tanks at the above site were removed in 1985.

I have enclosed a document dated May 15, 1998 written by the California Regional Water Quality Control Board, San Francisco Bay Region. On page 2 of the document, it states "MTBE was first used as an octane booster starting in the mid - 1980s in the Bay Area". There is a possibility that Arco may have obtained gasoline from another refinery that had MTBE in their gasoline.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: David Elias, Cambria Environmental, 1144 65th Street, Suite B
Oakland, CA 94608

Files

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

TO: LOP and LIA Agencies
in the Bay Area

FROM: Stephen Morse
Toxics Cleanup Division Chief

DATE: May 15, 1998

SIGNATURE: 

SUBJECT: Guidance on Analytical Methods for Oxygenates and Additives at Gasoline UST Sites

Last July, we asked the major oil refiners/distributors to provide information on gasoline oxygenates/additives and their potential to cause groundwater pollution in the Bay Area. Based on the technical reports submitted and other information, we conclude that only three classes of constituents pose a potential threat to groundwater - ether oxygenates (such as MTBE), one alcohol oxygenate (TBA), and lead scavengers (such as EDB). All of these constituents can be readily detected using EPA Method 8260. The oxygenates can also be detected using the less expensive EPA Method 8020 under certain circumstances. We should require the use of these methods to assure detection of gasoline oxygenates/additives at gasoline-leak sites. -

Background

Several oxygenates can be added to gasoline to comply with state and federal air quality requirements. Those in the ether family include: methyl tertiary butyl ether (MTBE), tertiary amyl methyl ether (TAME), diisopropyl ether (DIPE), and ethyl tertiary butyl ether (ETBE). Alcohols comprise another class of oxygenates: these include methanol, ethanol, and tertiary butyl alcohol (TBA).

MTBE is being detected in monitoring wells at numerous gasoline-leak sites and in a few domestic and municipal wells in the Bay Area. Apart from addressing this issue, Board staff are concerned that other gasoline oxygenates/additives could pose a threat to groundwater in our region. We also want to be sure that appropriate analytical methods are used to quantify concentrations of MTBE and other oxygenates/additives. On July 29, 1997, we sent Section 13267 technical-report requests to seven major oil companies (Arco, Chevron, Exxon, Shell, Texaco, Tosco, and Ultramar). The requests asked the oil companies to address several topics in their technical reports: chemicals added to gasoline distributed in the Bay Area over the last 20 years; the physical properties and potential health effects of gasoline constituents, potential for gasoline oxygenates/additives to affect groundwater, and analytical methods for gasoline oxygenates/additives.

"What's in Gas" Responses

We received responses from all seven oil companies in September and October. Shell Oil's submittal is representative of the responses, and is attached. (The suggested guidance in Shell Oil's submittal is not part of the subsequent guidance.) Several requested confidentiality for proprietary information concerning gasoline additives.

The responses include descriptions of the gasoline manufacturing and distribution system that are relevant. Petroleum blends and oxygenates are usually added at the refinery, and represent a significant percentage of the gasoline product (e.g. 1 to 20% by volume). Additives, such as detergent packages, are usually added in the distribution system and represent a small fraction of the gasoline product (e.g. 10 to 500 mg/l). Because of inter-connections in the distribution system, it is common for gasoline from one refinery to be retailed under other brand names. Inter-connections occur in the pipeline distribution system as well as tank-truck distribution.

MTBE is the most prevalent oxygenate used by the oil refiners/distributors responding to our request. It is the primary oxygenate for four of the refiners; the others are mainly distributors and retailers of refined gasoline in the Bay Area. MTBE was first used as an octane booster starting in the mid-1980s in the Bay Area. Widespread MTBE use began in the 1990-1992 period in order to meet air quality requirements. Current levels are in the 11 to 12% range. One refiner noted that methanol and tertiary butyl alcohol (TBA) can be present as impurities in MTBE. None of the other oxygenates are used nearly as much as MTBE. TAME has been used periodically by two of the refiners, typically when MTBE supplies were not readily available. ETBE has been used in the past by one refiner, and ethanol has been used in the past by two refiners.

Prior to the 1991 phase-out, oil refiners marketed leaded gasoline which included a lead anti-knock package. The anti-knock package contained lead scavengers, such as ethylene dibromide (EDB) and ethylene dichloride (EDC - also known as 1,2-dichloroethane). Other additives include: detergents, demulsifiers, carrier fluid, dilutents, anti-oxidants, and corrosion inhibitors.

Oxygenates/Additives of Concern

We conclude that the following oxygenates/additives may pose a threat to Bay Area groundwater quality:

- o Ether oxygenates - MTBE, TAME, DIPE, and ETBE
- o Tertiary butyl alcohol (TBA)
- o Lead scavengers - EDB and EDC (1,2-DCA)

In the case of the ether oxygenates, they are added to gasoline in high concentrations (thousands of ppm) and have chemical properties that may cause significant groundwater impacts. They are relatively water soluble, migrate readily in soil and groundwater, and may not be amenable to bio-degradation under typical subsurface conditions. At least one oxygenate - MTBE - has aesthetic impacts on drinking water at relatively low concentrations (10 to 30 ppb).

In the case of TBA, this alcohol oxygenate is somewhat resistant to bio-degradation, is soluble in water, and is therefore potentially mobile in groundwater. TBA is not currently used as an oxygenate in the Bay Area, but may appear as an impurity in MTBE or as an MTBE breakdown product.

Alcohol oxygenates other than TBA appear to pose little potential threat to groundwater. Although they may be added to gasoline at high concentrations (10 to 11% range) and are

soluble in water, they have not been used widely in the Bay Area and are highly prone to biodegradation if released to the environment.

In the case of lead scavengers, they are relatively toxic in drinking water (MCL of 0.05 ppb for EDB, MCL of 0.5 ppb for EDC) and may not be amenable to biodegradation under typical subsurface conditions. These features are mitigated somewhat by the following factors: they were added at lower concentrations (up to 500 ppb), they were phased out in 1991, and they appear to be less soluble and more prone to sorb to soil particles than oxygenates.

Other additives appear to pose little potential threat to groundwater. They are added to gasoline at low concentrations (typically less than 1,000 ppb). Most additives tend to sorb to soil particles, since they are polar, polymeric, or have large molecules. Many additives also succumb to biodegradation.

Analytical Methods

All of the above oxygenates/additives of concern can be identified by EPA Method 8260 (GC-MS) or its equivalent. MTBE and TBA can also be detected using the lower-cost EPA Method 8020 (GC-PID) or its equivalent, although false positives are common in samples with high TPH concentrations (see table footnotes below). Lead scavengers (EDB and EDC) can also be detected by EPA Methods 8010 (GC-ELCD) and 8021 (GC-FID/PID) or their equivalents. Method 8010 yields a lower detection limit than Method 8260; this may be a useful feature, given the low MCLs for the lead scavengers.

The choice of analytical methods depends on the oxygenate/additive, the stage of site management, and (for the oxygenates) the TPH concentration. The table below indicates which EPA methods (or their equivalents) should be used in these various circumstances:

Suggested analytical method, by constituent of concern:

Stage	Ether Oxygenates	TBA	Lead Scavengers
Investigation	8020 or 8260 a	8020 or 8260 b	8260
Monitoring	8020 or 8260 a	8020 or 8260 b	8260 or 8010 c
Pre-closure	8260	8260	8010

- Notes: a. Use 8260 or equivalent if TPH is over 5 mg/l (e.g. in source area)
 b. Use 8260 or equivalent if TPH is over 0.5 mg/l (e.g. at plume edge)
 c. Use 8010 if concentrations decline below 8260 detection limits

At the investigation and monitoring stage, TPH concentrations will dictate whether EPA Method 8020 is adequate for measuring ether oxygenates or TBA. At the investigation stage, dischargers face a dilemma: if they use EPA Method 8020 for groundwater grab samples and find elevated TPH concentrations, then they will have to repeat the sampling in order to use EPA Method 8260. Dischargers can avoid the problem by taking two samples at each temporary sampling point; the first one can be analyzed by EPA Methods 8020 and 8015 (TPH) and the second one need only be analyzed by EPA Method 8260 if the TPH concentration is over threshold levels given above. If oxygenates/additives of concern are not detected at this stage, then they need not be considered at subsequent stages of site management.

At the monitoring stage, the choice of methods used to quantify oxygenate concentrations will again depend on TPH concentrations. In general, EPA Method 8260 or its equivalent will be appropriate in source areas and EPA Method 8020 or its equivalent will be acceptable beyond source areas (e.g. plume edge). As with other constituents of concern, the oxygenate/additive monitoring program should be tailored to the specific site; the monitoring program need not require monitoring of all well for all quarters.

At the pre-closure stage, dischargers should use EPA Method 8260 or its equivalent to confirm oxygenate concentrations in groundwater for a representative subset of wells. This step would be unnecessary for sites or wells where EPA Method 8260 or its equivalent has been used regularly during the monitoring stage. For lead scavengers, dischargers should use EPA Method 8010 or its equivalent to demonstrate that concentrations of these more toxic constituents are very low or non-detect.

Next Steps

Gasoline constituents will probably change in the future, due to ongoing air-quality regulation, market conditions, and technical innovations. We intend to update information on gasoline oxygenates/ additives periodically, either with direct requests to oil refiners/distributors or via air-quality regulators. We will revise the above summary as appropriate based on any changes in gasoline constituents or analytical methods.

For further information, please contact Stephen Hill at (510) 286-0433 or Chuck Headlee at (510) 286-0435. (New phone numbers after 8/1/98 are (510) 622-2361 and (510) 622-2433, respectively.) I would like to acknowledge here the outstanding efforts of Kevin Graves, formerly of the Regional Board, who conducted the staff work necessary to the preparation of this document.

Attachment: Shell Oil response

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



*Sent 1/31/00
Including cc's*

20484

January 28, 2000

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION (LOP)
1131 Harbor Bay Parkway, Suite 250
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Mr. David Elias
Cambria Environmental
1144 65th Street, Suite B
Oakland, CA 94608
STID 3749

RE: Former Arco Station, 706 Harrison Street, Oakland, CA

Dear Mr. Elias:

I have reviewed the Third Quarter 1999 Monitoring Report dated December 2, 1999 that was prepared by Cambria Environmental. On August 27, 1999, Cambria Environmental consultants for 706 Harrison coordinated field activities with Aqua Science Engineers, consultants for adjacent upgradient site at 726 Harrison Street. Groundwater samples from both sites were sent to McCambell Analytical of Pacheco, CA.

After reviewing the analytical data, Cambria does not recommend evaluating the closure of 706 Harrison Street candidacy based on MTBE concentrations, but rather on the TPHg/BTEX concentrations detected historically beneath the site.

I have compared the MTBE data from groundwater samples collected on August 27, 1999 from the two sites. It is inconclusive if the MTBE detected in the groundwater at 706 Harrison Street came from 726 Harrison Street. Historical data identifies MTBE concentration at 706 Harrison as being higher in downgradient well MW-1 when compared to upgradient well MW-2. This is an indication an MTBE source maybe present at 706 Harrison. Therefore, when the site is being evaluated for closure, the MTBE concentration has to be taken into consideration.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Mr. Bo K. Gin, 288 11th Street, Oakland, CA
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0484

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

October 8, 1999

Mr. Bo Gin
288 11th Street
Oakland, CA 94706

RE: 706 Harrison Street, Oakland, CA 94607

Dear Mr. Gin:

I have reviewed the 2nd Quarter 1999 Monitoring Report that was prepared by Cambria Environmental. Sampling of groundwater in monitoring wells MW-3, MW-5, MW-6 and MW-7 may be reduced to semi-annual basis.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: David Elias, Cambria, 1144 65th Street, Suite B, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Ro#484

October 2, 1997
STID 3749

Bo Gin
288 - 11th St.
Oakland, CA 94607

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

re: former Arco, 706 Harrison St., Oakland, CA 94607

Dear Bo Gin:

This office has received and reviewed two Pre-Approvals from the Clean-Up Fund dated August 20 and September 15, 1997 and a Report of Groundwater Monitoring dated August 20, 1997 by Cambria Environmental Technology, Inc. for the above site. The following comments concern this report:

Mr. Bo Gin should be endorsing the report and submitting it himself.

1. As authorized by the Clean-Up Fund the remediation system should be installed and operated as soon as possible. There are still very high levels of contamination at this site.
2. There is a much higher level of MTBE in MW-4 than in either MW-2 or MW-1, which are both downgradient and which both have a much higher level of benzene. It appears that there may be an upgradient source for the MTBE, at least around that well. This office will check on data that we may already have on those sites.

Please contact Larry Seto, who will be taking over the site, if you have any questions regarding this letter at 567-6700.

Sincerely,

Thomas Peacock, Manager

c: David Alias, Cambria, 1144 - 65th St., Suite B, Oakland, CA
94608
Gordon Coleman - Files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

20484

Alameda County CC4580
Environmental Health Services
1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
(510)567-6700 FAX(510)337-933

STID 3749

August 20, 1996

Bo Gin
288 11th Street
Oakland, CA 94607

RE: FORMER ARCO, 706 HARRISON STREET, OAKLAND

Dear Mr. Gin,

This office is in receipt of and has completed review of the case file for this site, up to and including the August 14, 1996 Cambria Environmental Technology, Inc., (CET) "Third Quarter 1996 Monitoring Report".

Groundwater samples collected on 7/19/96 revealed benzene in monitoring wells MW-1 and MW-2 at concentrations of 5.2 mg/L and 7.3 mg/L, respectively. These groundwater concentrations, when compared to CA-modified ASTM Tier 1 Risk-Based Screening Levels (RBSLs), are exceeded for the following exposure scenarios:

- 1 "Groundwater-Vapor Intrusion from Groundwater to Buildings" at a target level of 1E-04 (RBSL is 2.14 mg/L, 1 in 10,000 excess cancer risk - commercial/industrial receptor).
- 2 "Groundwater-Volatilization to Outdoor Air" at a target level of 1E-06* (RBSL is 5.34 mg/L, 1 in 1,000,000 excess cancer risk - commercial/industrial receptor).
* exceeded for MW-2 only

In addition, benzene soil concentrations detected in confirmation samples during the February 1993 overexcavations (66 mg/kg) and the July 1993 monitoring well and soil vapor extraction well installations (210 mg/kg) revealed Tier 1 RBSL exceedances for the following exposure scenarios:

- 1 "Soil-Vapor Intrusion from Soil to Buildings" at a target level of 1E-04 (RBSL is 0.49 mg/L, 1 in 10,000 excess cancer risk - commercial/industrial receptor).
- 2 "Soil-Volatilization to Outdoor Air" at a target level of 1E-04 (RBSL is 13.25 mg/L, 1 in 10,000 excess cancer risk - commercial/industrial receptor).

A detailed ASTM Tier 2 analysis of this site appears not to be warranted for this site. The site has already been adequately characterized and additional information gathered would provide little useful information. Petroleum hydrocarbon-impacted soils remain at the soil/groundwater interface, at concentrations greatly exceeding Tier 1 RBSLs, at 1E-04 target levels.

Bo Gin
RE: 706 Harrison Street, Oakland
August 20, 1996
Page 2 of 2

Please submit a minimum of three bids for the installation and maintenance of the proposed SVE/AS system for pre-approval to Steve Marquez of the State Water Resources Control Board. As requested by Mr. Marquez, it is recommended that you alter the "Bid Form" to include time and materials format per UST Fund policies and eliminate the "Lump Sum" and "Unit Cost" format.

Please feel free to call me directly at (510)567-6880, should you have any questions concerning this matter.

Sincerely,



Dale Klettke, CHMM
Hazardous Materials Specialist

BC
c: David Elias, Cambria, 1144 65th Street, Suite C, Oakland, CA 94608
Gil Jensen, Alameda County District Attorney's Office
Steve Marquez, SWRCB UST Cleanup Fund

3749sve.as

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20484

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

STID 3749

July 8, 1996

Bo Gin
288 11th Street
Oakland, CA 94607

RE: FORMER ARCO, 706 HARRISON STREET, OAKLAND

Dear Mr. Gin,

This letter is in response to the submittal of groundwater monitoring reports to this office. After cursory review of the file, it appears that the last quarterly groundwater sampling and reporting for wells MW-1 through MW-3 was September 1994. The newly installed wells (MW-4 through MW-7) were initially sampled in December 1994. No additional groundwater sampling reports for the seven wells have been forwarded to this office.

At this time please adhere to a **quarterly** schedule of well sampling, monitoring, and report submittal as referenced in Title 23, California Code of Regulations (CCR) section 2652(d). Sample analytes shall continue to be total petroleum hydrocarbons as gasoline (TPHg), MTBE and the aromatic hydrocarbons benzene, toluene, ethyl benzene and total xylene isomers (BTEX). **Please have the seven wells sampled during the month of July 1996.**

Please be advised that I have been in contact with Steve Marquez of the UST Fund. In order to be eligible for the UST Fund, you need to be in compliance with the groundwater monitoring requirements. **Therefore, you need to submit a quarterly groundwater monitoring report to this office within 45 days, or no later than August 23, 1996.**

Please feel free to call me directly at (510)567-6880, should you have any questions concerning this matter.

Sincerely,

Dale Klettke, CHMM
Hazardous Materials Specialist

c: David Elias, Cambria, 1144 65th Street, Suite C, Oakland, CA 94608
Gil Jensen, Alameda County District Attorney's Office
Steve Marquez, SWRCB UST Cleanup Fund

3749gw.sch

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0484

RAFAT A. SHAHID, Assistant Agency Director

STID 3749

October 12, 1995

Bo Gin
288 11th Street
Oakland, CA 94607

Alameda County
Environmental Protection Division
1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
(510) 567-6700

CC4580

RE: FORMER ARCO, 706 HARRISON STREET, OAKLAND

Dear Mr. Gin,

This office is in receipt of and has completed review of the case file for this site, up to and including the August 29, 1995 Cambria Environmental Technology, Inc., (CET) "Corrective Action Plan". As you probably already know, this plan details the installation and maintenance of a combined SVE and air sparging system. CET states that this system should prove to be the most cost-effective and fastest remedial technology. Furthermore, CET anticipates that three to six months of system operation may remediate the site to acceptable levels.

The Corrective Action Plan (CAP) is to be implemented according to the following sequence of tasks:

- | | |
|---------|---|
| Task 1. | Air Sparge Well Testing |
| Task 2. | System Permitting |
| Task 3. | System Installation |
| Task 4. | Treatment Equipment, Operation and Reporting. |

Reporting requirements should include some form of documentation detailing estimated quantities of product removed, and amount of product removed to date, for the combined SVE/Air Sparging system.

Groundwater monitoring will be required to evaluate the performance of the SVE/Air Sparging system. Groundwater sampling should take place one (1) month and three (3) months after installation of the SVE/Air Sparging system. Once the corrective action plan has ended, a less frequent monitoring schedule will be evaluated by this office.

This Corrective Action Plan (CAP) is approved by this office. Work should commence no later than 30 days following receipt of this approval or November 12, 1995.

Please inform this office 72 hours in advance of operations involving the initial testing and startup of the SVE/Air Sparging system.

Mr. Bo Gin
RE: 706 Harrison Street, Oakland
Page 2 of 2

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

Sincerely,



Dale Klettke, CHMM
Hazardous Materials Specialist

c: David Elias, Cambria, 1144 65th Stree, Suite C, Oakland, CA 94608
Gil Jensen, Alameda County District Attorney's Office
Cheryl Gordon, SWRCB UST Cleanup Fund
Remediation Testing and Design, 609 Pacific Avenue., Suite 201, Santa Cruz, CA 95060
Jennifer Eberle--files

3749cap1.jet

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0484

RAFAT A. SHAHID, DIRECTOR

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

April 27, 1995
STID 3749

Bo Gin
288-11th ST.
Oakland CA 94607

RE: former ARCO, 706 Harrison St., Oakland CA 94607

Dear Mr. Gin,

Thank you for the "Subsurface Investigation Report," prepared by Cambria, dated 3/10/95. As you know, this report documents the installation of nine soil borings as follows: two additional soil borings, three additional soil vapor extraction/air sparging wells, and four additional groundwater monitoring wells.

Hand bailing of free product from VW2 continues on a twice-per-week basis. This was confirmed during a site visit on 4/26/95. The Soakease system is still being used in VW2. 1.25" of free product was observed in the first bailer pulled from VW2 on 4/26/95. **The drum which the free product/water mixture is being stored must be properly labelled and covered.**

The three new soil vapor extraction/air sparging wells are VW3, VW4, and VW5. During drilling of these wells, elevated concentrations of HCs were detected: up to 14,000 ppm TPHg and up to 120 ppm benzene in VW3 at 18'bgs, and 15,000 ppm TPHg and 160 ppm benzene in VW4 at 17.5'bgs. For comparison, the soil results for the first two vapor wells, VW1 and VW2, sampled at 17'bgs, and installed by Dennis Bates Associates (DBA) in July 1993, are as follows: 360 ppm TPHg and 18 ppm benzene for VW1, and 6,000 ppm TPHg and 210 ppm benzene for VW2 (see the 9/20/93 DBA report).

It appears that the gasoline contamination in soil has not extended downgradient and offsite. This is evidenced by the ND soil concentrations in VW5, and offsite wells MW5, MW6, and MW7. The gasoline contamination in soil appears to be confined to the former clustered UST area along Harrison St.

Vacuum extraction appears to be an effective remediation technique for this site, to remove HCs both from soil and groundwater, as per the "Report of Vacuum Extraction Feasibility Testing," prepared by Remediation Testing and Design, dated 5/27/94. However, the 3 new soil vapor extraction/air sparging wells are not yet plumbed together laterally.

Therefore, you are requested to submit a workplan for remediation system design and a startup schedule within 30 days, or by May 27, 1995.

April 27, 1995
STID 3749
Bo Gin
page 2 of 2

If you have any question, please contact me directly at 510-567-6761.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: David Elias, Cambria, 1144-65th St., Suite C, Oakland CA
94608
Gil Jensen, Alameda County District Attorney's Office
Cheryl Gordon, SWRCB UST CleanUP Fund
Remediation Testing and Design, 609 Pacific Ave., Suite
201, Santa Cruz CA 95060
Bill Reynolds, Acting Chief/file

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0484

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

August 29, 1994
STID 3749

Bo Gin
288-11th St.
Oakland CA 94607

Alameda County CC 4580
Health Care Services Agency
Dept. Of Environmental Health
1131 Harbor Bay Pkwy 2nd Flr.
Alameda, CA 94502-6577

RE: former Arco, 706 Harrison St., Oakland CA 94607

Dear Mr. Gin,

We are in receipt of the 8/15/94 Investigation Work Plan, prepared by Cambria Environmental Technology, Inc. This workplan includes a) five soil borings, three of which will be converted to soil vapor extraction and air sparging wells, b) an additional upgradient monitoring well, and c) three additional crossgradient and downgradient monitoring wells.

This workplan is acceptable for implementation. Please notify me at least 3 business days in advance of field activities.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney
Scott MacLeod, Cambria Environmental Technology, Inc.,
1144-65th St., Suite C, Oakland CA 94608
Ed Howell/file

je 3749-E

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0484

RAFAT A. SHAHID, Assistant Agency Director

June 10, 1994
STID 3749

Bo Gin
288-11th St.
Oakland CA 94607

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

RE: former Arco, 706 Harrison St., Oakland CA 94607

Dear Mr. Gin,

We are in receipt of the 5/27/94 letter Report of Vapor Extraction Feasibility Testing (VEFT), prepared by Remediation Testing and Design (RTD), under your cover letter dated 6/1/94. This report concludes that VEFT can be used as an effective remediation technique at this site for removing hydrocarbons from unsaturated soils, the capillary fringe and the water table surface.

The 5/27/94 RTD report recommends a vacuum extraction treatment system, with 3 additional vacuum points, for this site. This office is in agreement with this recommendation, and therefore requests that you submit a remediation workplan within 30 days, or by July 10, 1994.

I have been informed today by Eva Vanek of DBA that the Soak Ease system for free product removal has been installed, and that you, Mr. Gin, are replacing the absorbent socks every other day.

Please notify me at least 3 business days in advance of field activities.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney
Dennis Bates, 494 Alvarado St., Suite B, Monterey CA 93940
Eva Vanek, Dennis Bates Associates, 1020 Railroad Ave.,
suite E, Novato 94945
Ed Howell/file

je 3749-D

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0484

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 12, 1994
STID 3749

Bo Gin
288-11th St.
Oakland CA 94607

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

RE: **Free Product**, former service station, 706 Harrison St.,
Oakland CA 94607

Dear Mr. Gin,

I visited your site on 4/21/94 during the vapor extraction feasibility test (VEFT) performed by Remediation Testing and Design (RTD). During the visit, I spoke with Howard Whitney of RTD. He indicated that there was approximately 5 inches of free, floating product in both vapor wells on Monday 4/18/94, at the start of the test.

During a telephone conversation with Eva Vanek on 5/12/94, she indicated that there was approximately 2 or 3 inches of free, floating product in the vapor wells when she last monitored the wells. This was approximately 2 weeks ago, after the VEFT.

The free, floating product is a concern to this office. **Therefore, you are required to ". . .remove free product to the maximum extent practicable, . . ." as per 23 CCR, Division 3, Chapter 16, Section 2655 (a). This must be done immediately. Please contact me upon receipt of this letter to discuss this matter.**

Please notify me at least 3 business days in advance of field activities.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney
Dennis Bates, 494 Alvarado St., Suite B, Monterey CA 93940
Ed Howell/file

je 3749-C

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0484

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

November 22, 1993
STID 3749

Bo Gin
288-11th St.
Oakland CA 94607

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

RE: former service station
706 Harrison St.
Oakland CA 94607

Dear Mr. Gin,

This letter is being written in response to your request for interim direction subsequent to the Review Panel meeting held on 11/19/93. These suggestions may not be all inclusive, nor should they be construed to replace the forthcoming directive from the State Water Resources Control Board (SWRCB).

In regards to the 9/20/93 "Report of Groundwater Monitoring Well Installation" by Dennis Bates Associates (DBA), the following items must be clarified:

- 1) Plate 3 should include former UST locations, as well as locations of 2/10/93 soil samples in relation to MWs.
- 2) There should be a table for the 2/10/93 soil sampling results.
- 3) ALL soil sample locations from the 2/10/93 event should be included on Plate 2A.
- 4) How many drums of soil/water are onsite? They must be characterized and properly disposed. The same should be done for the drill cuttings which were thrown into the existing stockpile, against J. Eberle's objection during well drilling on 7/22/93. All laboratory reports and disposal documentation must be submitted to this office for ALL soil and water thus far disposed.
- 5) What is your theory for how Pb went from 430 ppm (waste oil stockpile sampled 1/17/91) to 18 ppm (sampled 6/17/93)?
- 6) What is your theory for how TRPH went from 200 ppm (waste oil stockpile sampled 1/17/91) and 300 ppm (waste oil stockpile sampled 9/28/92) to ND ppm (sampled 6/17/93)?
- 7) Were the MW locations moved from those proposed in the workplan? If so, why?

Bo Gin
STID 3749
November 22, 1993
page 2 of 2

The following activities must be conducted:

- A) The former pump island area along 7th St. must still be located and characterized for lead, as proposed in the 6/7/93 DBA workplan. This area was reported as having 370 ppm lead on 1/17/91. The soil and water samples analyzed for Pb and reported as ND in the 9/20/93 DBA report were from different locations and depths than the former pump island area along 7th St. Therefore, your recommendation on page 10 for no further lead sampling has no basis.
- B) Submit complete results of well surveying, groundwater elevations, and groundwater potentiometric maps.
- C) Well logs should be revised to include depth to groundwater and all construction details.
- D) Submit results for the Vacuum Extraction Feasibility Test (VEFT) to be conducted via the vapor extraction wells, as proposed in the 6/7/93 DBA workplan.

Please notify me at least 3 business days in advance of field activities so that I may arrange to be onsite.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney
Dennis Bates, 494 Alvarado St., Suite B, Monterey CA 93940
Ed Howell/file

je

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0484

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

October 28, 1993
STID 3749

Bo Gin
288-11th St.
Oakland CA 94607

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

RE: former service station
706 Harrison St.
Oakland CA 94607

NOTICE OF VIOLATION

Dear Mr. Gin,

As you know, I was onsite on 7/22/93 for the installation of monitoring wells and vapor extraction wells. This work was part of a workplan dated 6/7/93, prepared by Dennis Bates Associates (DBA). This workplan was conditionally accepted by letter dated 6/14/93. The final report was to be received by 9/14/93, as indicated by our 6/14/93 letter, as well as the 6/7/93 workplan. During a telephone conversation between myself and Dennis Bates on 10/1/93, the report was promised to me the week of 10/4/93. No report has been received. Every step of this investigation has been fraught with delay. Hence, this **Notice of Violation**. This case is being referred to the Alameda County District Attorney office for guidance.

In the meantime, you are required to submit the final report for work proposed in the 6/7/93 workplan by Dennis Bates Associates (DBA) **within 5 days or by November 4, 1993.**

Please be advised that "no person shall close an underground tank system unless that person . . . demonstrates to the appropriate agency . . . that the site has been investigated to determine if there are any present, or were past releases, and if so, that appropriate corrective or remedial actions have been taken," as per Section 25298 (c) (4) of the California Health & Safety Code, (CH&SC) Division 20, Chapter 6.7. Further, "any operator of an underground tank system shall be liable for a civil penalty of not less than five hundred dollars (\$500) or more than five thousand dollars (\$5,000) for each underground storage tank for each day of violation for. . . failure to properly close an underground tank system," as per Section 25299 (a) (5) of CH&SC, Division 20, Chapter 6.7.

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

Bo Gin
STID 3749
October 28, 1993
page 2 of 2

Please note that reports and documents no longer need to be copied to the Regional Water Quality Control Board. Kindly submit a cover letter with your consultant's reports. If you have any questions, please contact me at 510-271-4530.

Please notify me at least 2 business days in advance of field activities so that I may arrange to be onsite.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney
Dennis Bates, 494 Alvarado St., Suite B, Monterey CA 93940
Ed Howell/file

je

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

June 14, 1993
STID 3749

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

Bo Gin
288-11th St.
Oakland CA 94607

RE: 706 Harrison St.
Oakland CA 94607

Dear Mr. Gin,

We are in receipt of the "Amendment 1 to Workplan for Soil Disposal, Overexcavation, and Ground Water Monitoring Well Installation," prepared by Dennis Bates Associates, Inc., dated 1/13/93, but received in our office on 6/11/93. The workplan includes the installation of three groundwater monitoring wells, two vapor recovery wells and two soil borings; sampling of the former pump island near 7th St. and the stockpiled soil; and a vacuum extraction feasibility test.

We are also in receipt of a revised site map faxed to our office on 6/14/93. This site map indicates the locations of 3 monitoring wells in relation to the former USTs. The pump island near Harrison St. is also depicted; however, my request was the depiction of the 7th St. pump island and sampling locations. It is my assumption that these sampling locations will be determined in the field.

This workplan is acceptable on the condition that the purge water and drilling muds must be properly characterized and disposed in a timely fashion; documentation must be submitted to this office. Please inform me 3 working days in advance of field activities. As the workplan indicates, "all work should be completed approximately within 3 months after approval and funding of this workplan and receipt of all appropriate permits." I interpret this to mean that I will receive a final report within 3 months, or by **September 14, 1993**.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Jennifer Eberle".

Jennifer Eberle
Hazardous Materials Specialist

cc: Dennis Bates, Dennis Bates Assoc., 494 Alvarado St., Suite
B, Monterey CA 93940
Gil Jensen, Alameda County District Attorney Office
Rich Hiatt, RWQCB
Ed Howell/file

je

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0484

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

April 20, 1993
STID 3749

Bo Gin
288-11th St.
Oakland CA 94607

NOTICE OF VIOLATION

RE: 706 Harrison St.
Oakland CA 94607

Dear Mr. Gin,

This letter serves as notification of non-compliance with the formal request made in our letter dated 3/25/93. As you know, the 3/25/93 formal request was made for a workplan for a further subsurface investigation. This workplan has not been received in our office. You are once again requested to submit a workplan which addresses the five items in the 3/25/93 letter within 30 days or by May 20, 1993. You are also requested to submit the proper treatment permits and sampling results for the stockpile which is apparently being aerated onsite within 30 days or by May 20, 1993.

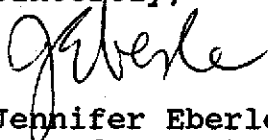
This is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a later response could result in the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day. Any extensions of the stated deadlines of modifications of the required tasks must be confirmed in writing by either this agency or the RWQCB.

All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; b) the State Water Resources Control Board LUFT Field Manual; and c) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. All reports and documents pertaining to this investigation should also be sent to Rich Hiatt of the Regional Water Quality Control Board (RWQCB).

Bo Gin
STID 2749
page 2 of 2
April 20, 1993

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

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: John Sammons, Dennis Bates Assoc., 494 Alvarado St., Suite
B, Monterey CA 93940
Gil Jensen, Alameda County District Attorney Office
Rich Hiett, RWQCB
Ed Howell/file

je

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0484

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 25, 1993
STID 3749

Bo Gin
288-11th St.
Oakland CA 94607

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

RE: 706 Harrison St.
Oakland CA 94607

Dear Mr. Gin,

As you know, overexcavation and resampling of the above referenced site was conducted on 2/10/93. I was present during much of these activities. However, the single 6,000-gallon tank pit had been sampled and backfilled prior to my arrival on site, as per a conversation between myself and John Sammons onsite on 2/10/93. I did witness soil sampling in the main tank pit, however. Sample #1 was taken at 16' bgs from the bottom of the excavation. Sample #2 was taken from the sidewall at approximately 10' bgs. The soil was stained green from a depth of approximately 10' bgs to the bottom of the excavation (16' bgs). No further sampling was conducted due to the instability of the excavation.

The stockpile generated from the overexcavation on 2/10/93 was to be sampled at a later date. The stockpile has been flattened out to approximate dimensions of 25' x 10' x 1', as was seen on subsequent site visits by myself. It appears that the stockpile is undergoing treatment, possible aeration. If this is the case, please submit copies of the proper treatment permits. During a telephone between myself and John Sammons on 3/5/93, he indicated that the stockpile had not been sampled.

He also indicated that a workplan for further work would be submitted the week of 3/15/93; the results for the 2/10/93 field work would be included with the workplan. Since I have not received any such workplan, this is a formal request for a workplan within 21 days or by April 15, 1993 which would include the following:

- 1) At least two soil borings in the vicinity of the main tank pit, in lieu of further sampling in the excavation.
- 2) Three groundwater monitoring wells, with one in the vicinity of the former waste oil tank, and one in the vicinity of the main tank pit.

Bo Gin
STID 3749
March 22, 1993
page 2 of 2

- 3) Soil samples from the well boreholes will be collected and analyzed at five foot intervals, or at changes in lithology, beginning at five feet below grade; analytes shall include TPH-gasoline and BTEX.
- 4) All investigation-derived materials, such as purge water and drilling muds, must be properly stored, characterized and disposed.
- 5) Lead contamination in the vicinity of the dispenser near 7th St. (370 ppm TTLC) and in the waste oil tank stockpile (430 ppm TTLC) must still be addressed.

This is a formal request for technical reports pursuant to California Water Code Section 13267(b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

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

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: John Sammons, Dennis Bates Assoc., 494 Alvarado St., Suite
B., Monterey CA 93940
Gil Jensen, Alameda County District Attorney Office
Rich Hiett, RWQCB
Ed Howell/file

je 3749-A

**ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY**

DAVID J. KEARS, Agency Director



R0484

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

Certified Mailer # P 113 815 349
February 5, 1993
STID 3749

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

Bo Gin
288-11th St.
Oakland CA 94607

RE: 706 Harrison St.
Oakland CA 94607

Dear Mr. Gin,

We are in receipt of a letter report prepared by Dennis Bates Associates Inc., documenting site activities conducted by Miller Environmental Co. (MEC) on 9/28/92. This report was dated 1/12/93 and was signed by John Sammons, a consultant formerly with MEC. This report documents the hand augering of three borings, BH-1, BH-2, and BH-3. Non-detectable concentrations were reported for BH-3 (sample #092565). However, the laboratory report contained an error for the sample description, which was hand-written over and initialed. The chain of custody also reflected the change.

I spoke with John Sammons on 1/21/93 regarding this change. He said that the laboratory mislabeled the samples, and were responsible for the changes in the laboratory report. I then spoke with Chris Lecce of Mobile Chem Labs Inc. on 1/26/93. She said that they did not write over or initial the sample, and that they would have issued a revised page if there were an error. I again spoke with John Sammons on 1/28/93. I indicated that we cannot accept the sample results for BH-3. He indicated that he did not know what happened to BH-3, and offered to resample that excavation. This excavation was previously sampled by Tank Protect Engineering (TPE) during the tank removal on 1/17/91, and had 390 ppm TPH-g and 0.69 ppm benzene.

We are also in receipt of a "Workplan for Soil Disposal, Overexcavation, and Ground Water Monitoring Well Installation," prepared by Dennis Bates Associates, dated 1/13/93. This report states on page 2 that "records of tank removal operations are not available and that the contractor who removed the tanks and appurtenances is no longer in business." Please understand that this office does indeed have the laboratory report and site map with sampling locations from the January 1991 tank removal by TPE. In addition, we have recently received copies of the tank manifests from TPE on 1/20/93 in response to a telephone conversation between myself and Jeff Farhoomand, President of TPE on 1/14/93. Mr. Farhoomand indicated that his company is indeed in business. He also indicated that TPE never issued a tank removal report due to a dispute with the client.

Bo Gin
STID 3749
February 5, 1993
page 2 of 3

This workplan is acceptable for implementation with the following understandings reached during a telephone conversation between myself and John Sammons on 2/1/93:

- 1) satisfactory documentation regarding the Site Safety Plan personnel will be submitted 48 hours in advance of field work
- 2) confirmatory soil samples will be obtained from the bottom and the sidewalls of the overexcavation
- 3) three monitoring wells will be installed, with one in the vicinity of the former waste oil tank, and one in the vicinity of the larger excavation for the former four 1,000-gallon USTs
- 4) the overexcavation will extend to the capillary fringe, but will not proceed below groundwater
- 5) this agency will be notified in advance (preferably 2 business days) of field activities in order to witness and confer with the consultant during field work
- 6) soil samples from the well boreholes will be collected at five foot intervals, or at changes in lithology, beginning at five feet below grade
- 7) soil samples from the well boreholes will be analyzed for TPH-gasoline and BTEX
- 8) all investigation-derived materials, such as purge water and drilling muds, must be properly stored, characterized and disposed
- 9) well borehole samples will be analyzed for organic lead by **DHS method** (not LUFT method), as per page 13 of the workplan
- 10) lead contamination in the vicinity of the dispenser near 7th St. (370 ppm TTLC) and in the waste oil tank stockpile (430 ppm TTLC) must still be addressed

I met with John Sammons and Darin Reinholdt of Dennis Bates Associates today onsite. Our intention was to perform hand augering in the excavations. We were not able to do this since the excavation for the single 6,000-gallon tank contained water. We opted not to hand auger the other, larger excavation since it has to be overexcavated anyway. We hope to schedule a date for overexcavation and resampling very soon.

Bo Gin
STID 3749
February 5, 1993
page 3 of 3

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

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: John Sammons, Dennis Bates Associates, 494 Alvarado St.,
Suite B., Monterey CA 93940
Jeff Farhoomand, Tank Protect Engineering, 2821 Whipple
Rd., Union City CA 94587-1233
Chris Lecce, Mobile Chem Labs, 5021 Blum Rd., Suite 3,
Martinez CA 94553
Gil Jensen, Alameda County District Attorney Office
Rich Hiett, RWQCB
Ed Howell/file

je

**ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY**

DAVID J. KEARS, Agency Director



R0498

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

Certified Mailer # P 113 815 350
February 4, 1993

STID 2360

Custom Alloy Scrap Sales
2730 Peralta St.
Oakland CA 94607
Attn: Chal Sulprizio,
Chief Operating Officer & President

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

Dear Mr. Sulprizio,

We are in receipt of a "Response to Alameda Health Care Services Agency, November 6, 1992 Letter," prepared by your consultant, Mary Lucas McDonald (MLM), dated 12/11/92. This report was submitted without a signed cover letter from your company, as previously requested by letter dated 8/31/92. However, we did receive a letter signed by Christine Noma from the law firm of Wendel, Rosen, Black, Dean & Levitan, dated 12/14/92, stating that they represent your company, and that they understand that MLM submitted a technical response. The 12/14/92 letter also requested a meeting; I left a message for C. Noma on 12/31/92, but have not heard back from her.

The 12/11/92 MLM response is essentially deficient in responding to the specific issues outlined in our Final Notice dated 11/6/92. MLM wants to discuss water quality cleanup objectives in lieu of pursuing further site characterization and/or remediation. We do not understand what the basis is for defining water quality objectives prior to defining the groundwater plume. Floating product has been present in groundwater beneath the site since at least May 1990. There has been nearly three years for free product to migrate offsite and downgradient, while you try to delay further site characterization and/or remediation. For several years, this agency has requested further work on numerous occasions, with very little cooperation on your behalf.

Please note that there is an apparent error on page 4 of the 12/11/92 MLM report, which states ". . . borings B8, B9, and B10, located along the southwest perimeter of the site, contained very low or nondetectable levels of these constituents." Soil boring B10 actually contained 980 ppm TPH-diesel at 9.5 feet bgs, and detectable levels of metals at 12 feet bgs. In addition, B7 contained 70 ppm TPH-diesel at 10 feet bgs. This is referenced in the "Phase II Subsurface Investigation" report by Cinda MacKinnon, dated 12/3/90.

Chal Sulprizio
STID 2360
February 4, 1993
page 2 of 2

The only item in the 11/6/92 letter to which MLM satisfactorily responded is item #5, which concerns the state of repair of the monitoring wells. The other four items remain in question. Therefore, the inadequacy of your response by MLM, dated 12/11/92, to items #1 through #4 in our Final Notice, dated 11/6/92, constitutes a refusal on your behalf to comply with our requests. As previously advised in our 11/6/92 letter, this matter will be referred to the Alameda County District Attorney's Office of Consumer and Environmental Protection for enforcement action.

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

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Mary Lucas MacDonald, 1715 Delaware St., Berkeley CA 94703
Rich Hiatt, RWQCB
Gil Jensen, Alameda County District Attorney
Ed Howell, Chief, Hazardous Materials Division
File

je 2360-A

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



*Not on board file
documents JTB*

R0484

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

September 17, 1992
STID 3749

Oakland Auto Parts & Tires
ATTN: Bo Gin
288 - 11th St.
Oakland, CA 94607

Re: 706 Harrison St., Oakland, CA 94612

Dear Bo Gin:


This office has reviewed the Results for Preliminary Subsurface Site Investigation (undated but assumed to be after Dec. 11, 1991) by Tracy Bennett. Although the report contains no conclusions or recommendations the results certainly indicate that a groundwater investigation is required.

I have enclosed the document, Workplan for Initial Subsurface Investigation, a guidance document published by the Regional Water Quality Control Board (RWQCB).

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Please submit a workplan for a groundwater investigation as described in the above document to this office within thirty (30) days of this letter. All workplans, analytical results or reports should be sent to our office and to that of the RWQCB to the attention of Mr. Rich Hiatt. Their address is 2101 Webster St., Fourth Floor, Oakland CA 94612. Be aware that failure to submit the requested documents may subject you civil liabilities.

If you have any questions please call this office at (510) 271-4530.

Sincerely,


Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: R. Hiatt, RWQCB
Edgar Howell, Chief - Files
enclosures

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0484

RAFAT A. SHAHID, Assistant Agency Director

March 4, 1992

Mr. Bo Gin
288 11th Street
Oakland, CA 94607

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

Re: Contamination at 706 Harrison Street, Oakland, CA 94612

Dear Mr. Gin:

This letter memorializes a recent telephone conversation we had discussing Alameda County Environmental Health Department, Hazardous Materials Division's procedure regarding the closure of underground storage tanks.

As discussed, pipe line samples are a mandatory part of the tank closure process, samples are required beneath each 20 lineal feet of piping.

According to the Tri-Regional Board Staff Guidelines for Preliminary Evaluation and Investigation of Underground Tank Sites (8/10/90) "in areas where obvious contamination are observed, they are to be sampled". However, I do not recall requesting additional sampling at the time of the tank removals.

If you have additional questions regarding the tank closure process or other requirements for addressing contamination at the site please do not hesitate to call me at (510) 271-4320.

Sincerely,

Paul M. Smith
Hazardous Materials Specialist

cc:

Tracy Bennett, Consolidated Technologies
Eddy So, SFRWQCB
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Affairs

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0484

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

October 3, 1991

Mr. Bo Gin
288 11th Street
Oakland, CA 94607

Re: Contamination at 706 Harrison Street, Oakland, CA 94612

Dear Mr. Gin:

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed the Work Plan for Preliminary Subsurface Site Investigation prepared by Consolidated Technologies.

The initial laboratory analysis from samples taken during the removal of the 7 underground storage tanks at the above site on January 17, 1991 indicated contamination levels of Total Petroleum Hydrocarbon (TPH) as high as 9400 ppm, and Benzene levels as high as 17 ppm in the soil samples taken from beneath the former tanks.

The Work Plan proposes to excavate in eight areas in order to confirm analyses performed during the tank removals. Excavation is proposed in each of the former tank locations where initial contamination was detected to an additional depth of three to five feet and then to collect a confirmatory sample.

There is some question as to whether the limited amount of excavation proposed in the Work Plan adequately addresses the removal of all possible soil contamination.

The Work Plan will be approved upon written confirmation of the following conditions:

- 1) You are required to excavate or to treat all soil which poses a potential source of groundwater contamination. If contamination is determined to exceed the proposed excavation depth of three to five feet then you are required to deal with this problem appropriately.
- 2) You are requested to specify methods proposed to characterize all stock piled soils from each excavated area. You are requested to specify the analytical tests necessary to properly characterize this material for either on site treatment or disposal.
- 3) The initial results of stockpiled samples collected from the former waste oil tank area contained levels of lead as high as 430 ppm. Based upon these levels, you are required to determine the soluble threshold limit concentration (stlc) by laboratory analysis. The stlc will determine that portion of lead which is water soluble.

Mr. Gin
October 3, 1991
page 2 of 2

4) You are required to have your consultant specify the site security measures employed in securing the area following excavation and during the two week interval when laboratory results are pending.

5) You are required to cover all stock piled soils with visqueen until a permit to aerate is obtained from the Bay Area Air Quality Management District (BAAQMD).

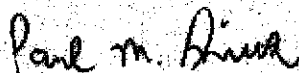
you are requested to address the above issue within 15 days of the receipt of this letter or by October 21, 1991.

Finally, prior to initiating work at the above site you are requested to provide this office with advanced notification as to when the work will be conducted on site so that if possible a representative from this office can be present when the work is being performed at the site.

Please be advised that the above Work Plan only addresses the soil contamination phase of the remediation effort at the above site once soil has been adequately addressed it will then be necessary to determine if any impact to groundwater has occurred.

If you have any questions regarding the content of this letter please contact me at (510) 271-4320.

Sincerely,



Paul M. Smith
Hazardous Materials Specialist

cc:

Tracy Bennett, Consolidated Technologies
Lester Feldman, SFRWQCB
Charlene Williams, DHS
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Affairs

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0484

May 20, 1991

Mr. Bo Gin
288 11th Street
Oakland, CA 94607

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

Re: Contamination at 706 Harrison Street, Oakland, CA 94612

Dear Mr. Gin:

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed the workplan for Preliminary Subsurface Investigation dated 4/22/91 proposed by Frank Lee and Associates.

The workplan proposes to drill 8 soil borings in the locations of the former underground storage tank excavations. The borings will confirm the vertical presence of petroleum contamination beneath of these areas. The workplan as proposed is hereby approved. However you are requested to also delimit the lateral extent of the soil contamination at the above site and to investigate whether there has been impact to groundwater. **Please provide a workplan specifying proposed activity to determine the lateral and vertical extent of soil contamination, to define the hydraulic gradient, and to determine water quality within 60 days of the receipt of this letter.**

You are also requested to provide this office with copies of the hazardous waste manifests for the disposal of the 8 underground storage tanks which were removed from the above site.

Prior to installing the proposed borings you are requested to provide this office with advanced notification as to when the work will be conducted on site.

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

Sincerely,

Paul M Smith
Hazardous Materials Specialist

cc:

Frank Lee, Frank Lee & Associates
Lester Feldman, SFRWQCB
Charlene Williams, DHS
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Affairs
Rafat A. Shahid, Assistant Agency Director, Alameda County
Environmental Health Department

File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0484

March 19, 1991

Certified Mailer # P 062 128 296

Mr. Bo Gin
288 11th Street
Oakland, CA 94607

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

Re: Contamination at 706 Harrison Street, Oakland, CA 94612

Dear Mr. Gin:

Alameda County Environmental Health Department is in receipt of the laboratory analysis from samples taken during the removal of the 7 underground storage tanks at the above site on January 17, 1991.

The laboratory results indicated contamination levels of Total Petroleum Hydrocarbon (TPH) as high as 9400 ppm, and Benzene levels as high as 17 ppm in the soil samples taken from beneath the former tanks.

You are requested to submit a workplan proposal to address the investigative and mitigative procedures chosen within 45 days of the receipt of this letter.

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

All work must be performed according to RWQCB documents:

Leaking Underground Fuel Tank Field Manual revised October 1989

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

Appendix A of the Tri-Regional Recommendations (see enclosure)

Copies of this documents can be obtained by calling the SFRWQCB data management group at 464-1269. Please note the LUFT manual as a whole has not been adopted by the SFRWQCB.

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

Mr. Gin
March 19, 1991
Page 2 of 2

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

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

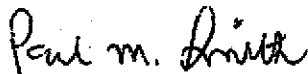
All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and to:

Lester Feldman
Regional Water Quality Control Board, San Francisco Bay Region
1800 Harrison Street, Suite 700
Oakland, California 94612
(415) 464-1255

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

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

Sincerely,



Paul M. Smith
Hazardous Materials Specialist

cc:

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

File

1.9.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0484

October 24, 1990

Bo Gin, Oakland Auto Parts
288 - 11th St.
Oakland, CA 94607

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

Re: 706 Harrison St., Oakland

FINAL NOTICE OF VIOLATION

Dear Mr. Gin:

Our records indicate that there are underground tank(s) at your site at the above facility. You notified this office that you were closing the tank but no other action has been taken to date.

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
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0484

December 11, 1989

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

Bo Gin, Oakland Auto Parts
288 11th St.
Oakland, CA 94607

Re: Gin's Arco Service, 706 Harrison St., Oakland, CA 94607

NOTICE OF LEGAL OBLIGATION

Dear Mr. Gin:

Our records indicate that there are underground tank(s) at your site at the above facility.

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, or
2. Apply for a permit as required by Article 10, 2710.

Notify this Department within 10 days of your intentions and to obtain the necessary instructions and forms.

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,

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

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