

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Ro# 783

April 22, 1997

Mr. John Margowski
Wickland Properties
P.O. Box 13648
Sacramento, CA 95853

ENVIRONMENTAL HEALTH SERVICES

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

STID 3534

Re: Investigations at Formal Regal Station #404, located at 5901 MacArthur Blvd., Oakland, CA

Dear Mr. Margowski,

This office has received Blakely Environmental Investigation Inc.'s (Blakely) response to the County's February 11, 1997 letter to your office. Although Blakely states that there is no scientific basis for the County's statements that attenuation is not apparent in MW-1, the attached plots of benzene concentrations versus time and the log of benzene concentrations versus time for Well MW-1 suggest that benzene attenuation is not definite. Standardly, the "goodness of fit" or R^2 value of the regression line should be between 0.6 to 1 to be acceptable. The R^2 value for Well MW-1's regression line is 0.001, per the Microsoft Excel software. You are welcome to submit your own plots in defense of your argument that significant biodegradation is occurring in Well MW-1. This information should include concentrations and log of concentrations versus time; regression lines with an R^2 value between 0.6 and 1; and a calculation of the actual attenuation rate using first order rate determinations (i.e., $dC/dt = -kC$).

If attenuation cannot be justified through these methods, this office is requesting that you conduct the work outlined in the attached February 11, 1997 letter. This work should be conducted by **June 10, 1997**. You also have the option of continuing groundwater monitoring in an attempt to confirm acceptable levels of natural attenuation in Well MW-1. Due to the fluctuating concentrations in Well MW-1, it is also suggested that you plot concentrations versus time over groundwater table fluctuations over time to see whether there is any correlation there. Sometimes limited amounts of microbial degradation occur with the input of additional levels of dissolved oxygen during the seasonal groundwater recharge.

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

Sincerely,



Juliet Shin

Senior Hazardous Materials Specialist

Mr. John Margowski
Re: 5901 MacArthur Blvd.
April 22, 1997
Page 2 of 2

ATTACHMENT

cc: David Blakely
Blakely Environmental Investigations, Inc.
P.O. Box 339
Wrightwood, CA 92397

Chief, ACDEH

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Ro# 783

February 11, 1997

Mr. John Margowski
Wickland Properties
P.O. Box 13648
Sacramento, CA 95853

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

STID 3534

Re: Investigations at Former Regal Station #404, located at 5901 MacArthur Blvd., Oakland, CA

Dear Mr. Margowski,

This office has reviewed the January 4, 1997 Request for Closure, prepared by Blakely Environmental Investigations, Inc. (Blakely), for the above site, however, this report does not address all the concerns outlined in the County's September 25, 1996 and October 22, 1996 letters to your office. The Blakely report states that the site should be closed based on observed bioremediation at the site, but this office is not convinced by the report that concentrations in Well MW-1 are decreasing. In fact, concentrations in Well MW-1 almost appear to be increasing through time or remaining constant. Therefore, due to the apparent persistence of the contaminant concentrations, the remaining soil and groundwater contaminant concentrations at the site may pose a threat to human health. Per the County's June 18, 1996 and September 25, 1996 letters, this office is requesting that you provide us with information on the planned use of the site and submit a risk assessment discussion with rationale as to why the residual soil and groundwater contamination at the site will/will not pose any future threat.

Additionally, per the County's September 25, 1996 and October 22, 1996 letters, this office is concerned that the concentrations observed in Well MW-1 are migrating readily along the permeable trench material of the storm culvert onto the adjacent downgradient property. The proximity of the culvert to Well MW-1 and the historical elevation contours appear to indicate migration of the plume along the culvert as well. To this date, no off-site investigations have been conducted downgradient of Well MW-1, to characterize the extent of the contamination in Well MW-1. This office is requesting that you inform the County of the land use for the downgradient neighboring site, and include a discussion on any potential risks for this site in the above required risk assessment submittal. Due to the fact that the extent of this groundwater contaminant plume was never delineated, a fate and transport calculation predicting the migratory extent of the contaminant plume, both within the culvert trench and outside of this trench, should be included with the risk assessment. A prediction of the migration potential for this plume is necessary to fully characterize the contamination and to determine whether the plume is stable prior to closing the site.

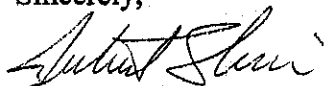
Mr. John Margowski
Re: 5901 MacArthur Blvd.
February 13, 1997
Page 2 of 2

Per the Regional Water Quality Control Boards' guidelines, a 0.5-mile radius well survey is needed to determine whether there are any drinking water wells in the area that may influence the contaminant plume or become contaminated. Please submit the well survey data with the above risk assessment information.

Please submit the above requested information within 60 days of the date of this letter (i.e., by April 10, 1997).

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

Sincerely,



Juliet Shin
Senior Hazardous Materials Specialist

cc: David Blakely
Blakely Environmental Investigations, Inc.
P.O. Box 339, Wrightwood, CA 92397

Acting Chief

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#783

October 22, 1996

Mr. David Threlfall
Western Geo-Engineers
1386 East Beamer Street
Woodland, CA 95776-6003

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

STID 3534

Re: Investigations at Former Regal Station #404, located at 5901 MacArthur Blvd., Oakland, CA

Dear Mr. Threlfall,

In response to your October 18, 1996 letter, collection of the following additional data is acceptable in order to better characterize the site and to assist in conducting an adequate risk assessment:

- "1) The identification of domestic and municipal water wells or other sensitive receptors that are located hydraulically downgradient from the subject site;
- 2) Investigation of the planned/potential uses of the properties adjacent to the subject site; and
- 3) Investigation of contaminated sites that are located hydraulically upgradient from the subject site."

Additionally, per the September 1996 Groundwater Monitoring report for the site, Western Geo-Engineers states that "the overall flow direction is to the southwest with the elevation gradients forming a trough that most likely reflects the hydraulic influence of the fill materials surrounding the buried culvert beneath the site." Based on our review of the groundwater gradient at the site, this office is concerned that the elevated contaminant concentrations observed in Well MW-1 may be migrating along the culvert material. If this is the case, neighboring wells MW-2 and MW-3 may not be in adequate downgradient locations to properly characterize the extent of the contaminant plume. If contaminant concentrations observed in Well MW-1 remain consistent in the next quarterly sampling event, additional investigations will need to be conducted in order to properly characterize the downgradient extent of this contamination along the fill material. This information will also assist in developing a more accurate risk assessment.

If you feel that the contamination observed in Well MW-1 is resulting from off site, than it is recommended that hydropunches be placed both upgradient and downgradient of Well

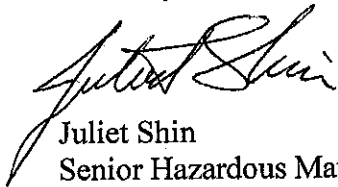
Mr. David Threlfall
Re: 5901 MacArthur Blvd.
October 22, 1996
Page 2 of 2

MW-1 along the culvert's fill material in order to confirm this. At this time, based on the significantly lower concentrations of benzene observed in upgradient well MW-4, it appears that the elevated benzene concentrations observed in Well MW-1 are resulting from the former USTs area on site.

Lastly, the Well Sampling Data Sheet for Well MW-3, included in the September 1996 Groundwater Monitoring Report, states that a pile of dirt still remains at the site. Please provide this office with information on the source of this material and whether this material has been adequately profiled.

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

Sincerely,



Juliet Shin
Senior Hazardous Materials Specialist

cc: Mr. John Margowski
Wickland Properties
P.O. Box 13648
Sacramento, CA 95853

Acting Chief

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



20783

September 25, 1996

Mr. John Margowski
Wickland Properties
P.O. Box 13648
Sacramento, CA 95853

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

STID 3534

Re: Investigations at Former Regal Station #404, located at 5901 MacArthur Blvd., Oakland, California

Dear Mr. Margowski,

This office has reviewed Western Geo-Engineers' (WEGE) Quarterly Groundwater Monitoring Report, dated August 15, 1996, for the above site. Per the report, WEGE recommends that a file search be conducted to determine whether sites hydraulically upgradient from the subject site may be contributing diesel and/or gasoline range hydrocarbons to the site. It appears that this work has already been conducted per Task II of WEGE's November 2, 1994 work plan. Additionally, WEGE has recommended that a risk assessment be conducted for the site. Per the County's June 18, 1996 letter, the risk assessment should be conducted for the planned/potential future site use and should address both soil and groundwater contamination at the site. Furthermore, based on the fact that the contaminant plume is located in very close proximity to the downgradient adjacent site, the risk assessment should also address the projected fate and transport of the observed contaminant plume and the adjacent site use. The projected fate and transport may include information on any microbial degradation of the plume. These issues need to be addressed prior to any consideration of site closure.

Lastly, quarterly groundwater monitoring should continue in the interim, due to the fact that concentrations in Well MW-1 appear to be increasing and that significant fluctuations in concentrations have been observed in Wells MW-2 and MW-4, which seem to correlate with fluctuating groundwater depths.

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

Sincerely,

Juliet Shin
Senior Hazardous Materials Specialist

Mr. John Margowski
Re: 5901 MacArthur Blvd.
September 25, 1996
Page 2 of 2

cc: George Converse
Western Geo-Engineers
1386 East Beamer Street
Woodland, CA 95776-6003

Acting Chief

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Ro 783

Alameda County Environmental Health
Environmental Protection Services
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577
(510)567-6700 fax: (510)337-9335

September 16, 1996

Mr. John Margowski
Wickland Properties
P.O. Box 13648
Sacramento, CA 95853

STID 3534

Re: Investigations at the Former Regal Station #404, located at 5901 MacArthur Blvd.,
Oakland, California

Dear Mr. Margowski,

Per the County's June 18, 1996 letter and Article 5 Title 23 California Code of Regulations, Wickland Properties is required to continue quarterly groundwater monitoring at the above site. To date, this office has not received any groundwater monitoring reports for quarterly sampling events conducted in 1996. Per my conversation with your consultant, George Converse of Western Geo-Engineers, the first two 1996 quarterly monitoring events were, in fact, conducted at the site and quarterly groundwater reports detailing this work were submitted to Wickland Properties. This office is requesting that Wickland Properties submit copies of these reports to the County within 30 days of the date of this letter.

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

Sincerely,



Juliet Shin

Senior Hazardous Materials Specialist

cc: George Converse
Western Geo-Engineers
1386 East Beamer Street
Woodland, CA 95776-6003

Acting Chief-File

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO# 783

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

June 18, 1996

Mr. John Margowski
Wickland Properties
P.O. Box 13648
Sacramento, CA 95853

STID 3534

Re: Investigations at the Former Regal Station #404, located at 5901 MacArthur Blvd.,
Oakland, California

Dear Mr. Margowski,

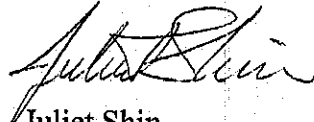
This office has reviewed Western Geo-Engineer's January 29, 1996 report documenting the installation of Wells MW-2 through MW-4 and the culvert inspection at the above site. Per the report, Wickland Properties is requesting closure for the site. However, the following questions/issues need to be addressed before this site can be considered for closure:

- o Due to the contamination identified in Wells MW-1, MW-2, and MW-4, and the fact that Wells MW-2 through MW-4 have only been monitored once, this office is requesting that, at this time, groundwater monitoring continue at the site. It is uncertain as to whether the elevated concentrations identified in Well MW-4 is resulting from an off-site or on-site source. The elevated gasoline contamination observed in this well does not appear to be attributable to the culvert, based on the fact that no gasoline was identified in the culvert. Further monitoring will allow for identification of any potential fluctuations of concentrations in this well and/or assistance in determining whether concentrations appear to be naturally degrading at the site. Concentrations do not appear to be degrading/attenuating in Well MW-1, based on the last two years of groundwater monitoring. This office would like a better sense of the anticipated rate of biodegradation of contaminants at the site before considering the site for closure.
- o What are the land use plans for the site? Based on the anticipated land use for the site, this office would request that a risk assessment addressing the on-site soil and groundwater contamination and potential exposure pathways be conducted prior to considering the site for closure.
- o It appears that the plume has begun migrating off site. Please submit information on the use of the property immediately downgradient of the site.

Mr. John Margowski
Re: 5901 MacArthur Blvd.
June 18, 1996
Page 2 of 2

The next groundwater monitoring report is due to this office within 45 days of the date of this letter. If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,



Juliet Shin

Senior Hazardous Materials Specialist

cc: George Converse
Western Geo-Engineers
1386 East Beamer Street
Woodland, CA 95776-6003

Acting Chief-File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0783

RAFAT A. SHAHID, Assistant Agency Director

June 26, 1995

Mr. John Margowski
Wickland Properties
P.O. Box 13648
Sacramento, CA 95853

ALAMEDA COUNTY-ENV. HEALTH DEPT.
ENVIRONMENTAL PROTECTION DIV.
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577
(510)567-6700

STID 3534

Re: Work plan for investigations at the Former Regal Station
#404, located at 5901 MacArthur Blvd., Oakland, California

Dear Mr. Margowski,

This office received Western Geo-Engineer's (WEGE) work plan, dated February 2, 1995, on April 28, 1995. This office has reviewed the work plan and finds it acceptable, with the following comments/additional requirements:

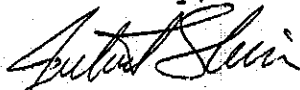
- o The work plan proposes to reuse the stockpiled soil on site, although it still contains Total Petroleum Hydrocarbons as diesel (TPHd) at levels of up to 37 parts per million (ppm), and traces of toluene and xylenes. This office requires that levels of TPHd be below 10 ppm before this soil can be reused on site. Additionally, if there is currently no lining beneath the stockpiled soil, at least one sample should be collected from beneath this pile during the next stockpiled soil sampling event.
- o The work plan proposes that the inside of the storm drain culvert, running beneath the site, be inspected for cracks along the drain joints. If no cracks are found along these joints, this office advises that you investigate the potential for contaminants to migrate along the trench material surrounding the drain.
- o The detection limit proposed for the TPHd analysis is 10 ppm. However, this office is requesting that you utilize a detection limit of 1 ppm.
- o After installing the two proposed wells, please be reminded to wait a minimum of 72 hours before developing them. Additionally, after developing these wells, you should wait a minimum of 24 hours prior to sampling the wells.

Mr. John Margowski
Re: 5901 MacArthur Blvd.
June 26, 1995
Page 2 of 2

Field work shall commence within 60 days of the date of this letter. A report documenting field work shall be submitted to this office within 45 days after completing field activities. Quarterly groundwater monitoring and reporting shall continue for the site.

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

Sincerely,



Juliet Shin
Senior Hazardous Materials Specialist

cc: George L. Converse
Western Geo-Engineers
1386 East Beamer St.
Woodland, CA 95776-6003

Acting Chief-File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0783

RAFAT A. SHAHID, Assistant Agency Director

September 6, 1994

Mr. John Margowski
Wickland Properties
P.O. Box 13648
Sacramento, CA 95853

ALAMEDA COUNTY 430-453
HEALTH CARE SERVICES
DEPT. OF ENVIRONMENTAL HEALTH
1131 HARBOR BAY PKWY 2ND FLOOR
ALAMEDA CA 94502-6577

STID 3534

Re: Investigations at the Former Regal Station #404, located at
5901 MacArthur Blvd., Oakland, California

Dear Mr. Margowski,

This office has reviewed the analytical results for the ground water samples collected from the site's Well MW-1 in November 1993, February 1994, and June 30, 1994. Elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg) and benzene have consistently been identified from this well. Additionally lower levels of Total Petroleum Hydrocarbons as diesel (TPHd) were identified during two of the above quarters.

Per Article 11 Title 23 California Code of Regulations, you are required to delineate the extent of the observed ground water contaminant plume. Per the Regional Water Quality Control Board's (RWQCB) guidelines, permanent monitoring wells will be required to define the extent of the contaminant plume.

A work plan addressing the above requirements shall be submitted to this office **within 60 days** of the date of this letter.

Additionally, per the County's July 20, 1994 letter to your office, you are required to submit information documenting the fate of the stockpiled soil. If the stockpiled soil is still on site, then you will be required to submit, along with the required work plan, a proposal outlining your plans for this soil.

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

Sincerely,

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

Juliet Shin

/ Hazardous Materials Specialist

Mr. John Margowski
Re: 5901 MacArthur Blvd.
September 6, 1994
Page 2 of 2

cc: George Converse
Western Geo-Engineers
1386 E. Beamer St.
Woodland, CA 95695-9603

Edgar Howell

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

R0783

November 16, 1994

Mr. John Margowski
Wickland Properties
P.O. Box 13648
Sacramento, CA 95853

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

STID 3534

Re: Work plan for investigations at the formal Regal Station
#404, 5901 MacArthur Blvd., Oakland, California

Dear Mr. Margowski,

This office has reviewed Western Geo-Engineer's (WEGE) work plan, dated November 2, 1994, and it is acceptable to this office. WEGE mentions that a buried storm drain culvert, bisecting the site, may be acting as a conduit for contamination resulting from off site to impact your site. However, likewise, this also implies that contaminants resulting from on site may be migrating off site along the culvert. Future investigations, such as plume delineation work, must therefore be conducted accordingly to account for this potential.

Lastly, this office has attached a map showing the locations of neighboring tank investigation sites to possibly assist you in your proposed survey.

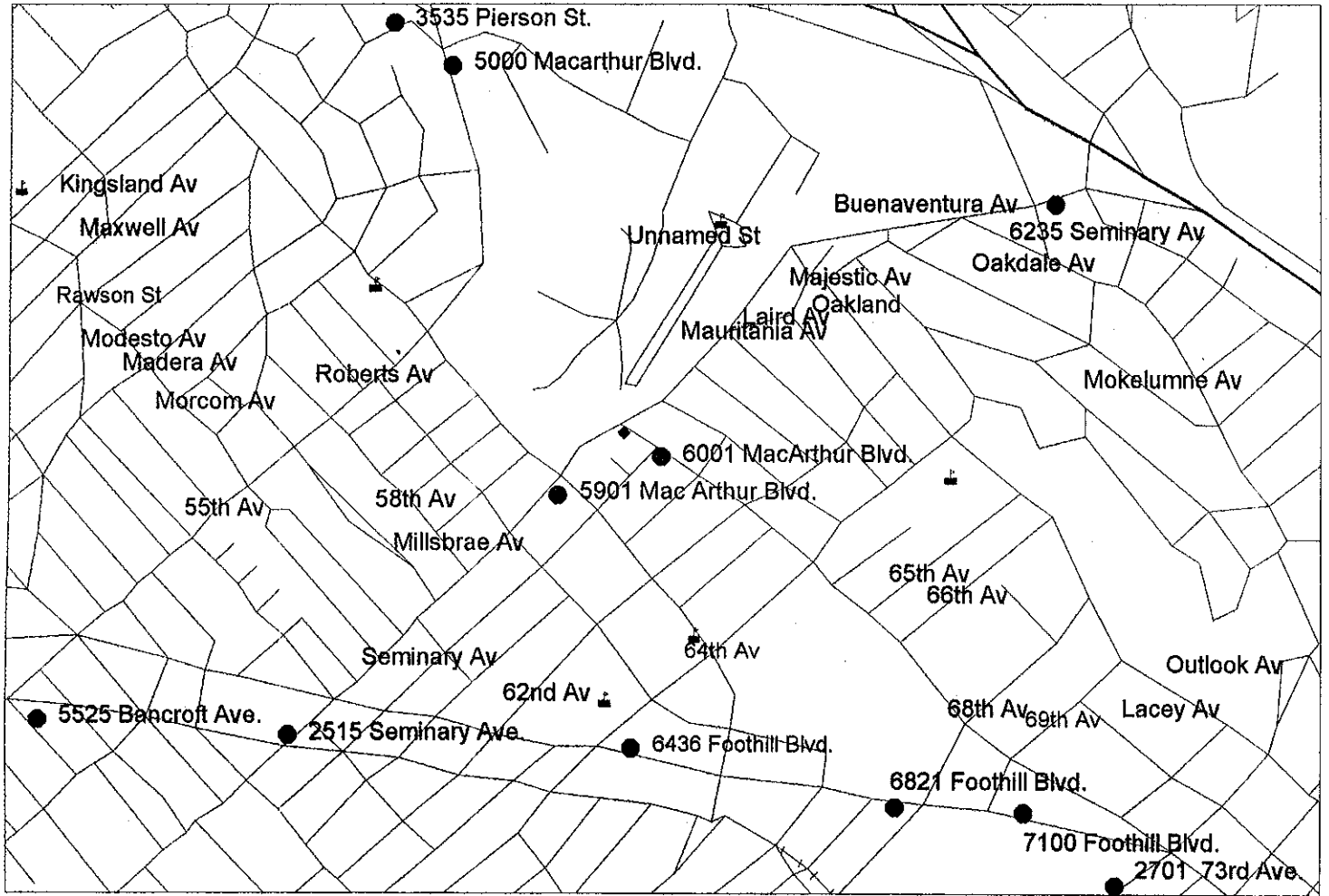
If you have any questions or comments, please contact me at (510) 567-6700.

Sincerely,

Juliet Shin
Senior Hazardous Materials Specialist

cc: George L. Converse
Western Geo-Engineers
1386 East Beamer St.
Woodland, CA 95776-6003

Edgar Howell



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0783

RAFAT A. SHAHID, Assistant Agency Director

July 20, 1994

Mr. John Margowski
Wickland Properties
P.O. Box 13648
Sacramento, CA 95853

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 HARBOR BAY PARKWAY, 2ND FLOOR
ALAMEDA, CA 94502-6577

STID 3534

Re: Required investigations at the Former Regal Station #404,
located at 5901 MacArthur Blvd., Oakland, California

NOTICE OF VIOLATION

Dear Mr. Margowski,

On February 28, 1994, this office sent you a letter requiring you to conduct monthly water level measurements and quarterly ground water monitoring for the above site, per Section 2652 Title 23 California Code of Regulations and the Regional Water Quality Control Board's guidelines. Subsequent to the February 1994 letter, this office has not received any quarterly ground water monitoring reports. You are required to submit a quarterly ground water monitoring report **within 45 days** of the date of this letter.

Monthly water level measurements, for the first 12 months and quarterly thereafter, and quarterly ground water monitoring and reporting shall continue at the site until the site qualifies for case closure. The referenced quarterly reports must describe the status of the investigation and must include, among others, the following elements:

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

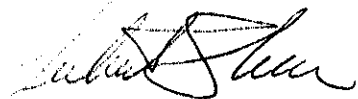
Mr. John Margowski
Re: 5901 MacArthur
July 20, 1994
Page 2 of 2

- o Recommendations or plans for additional investigative work or remediation.

Lastly, it is the understanding of this office that contaminated excavated soil is still stockpiled on site. This soil needs to be hauled off site to an appropriate disposal facility, or remediated on site. Please submit a summary proposal indicating what you intend to do with the stockpiled soil.

If you have any questions or comments, please contact me at (510) 337-2864 or (510) 337-2874.

Sincerely,



Juliet Shin
Hazardous Materials Specialist

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

George Converse
Western Geo-Engineers
1386 E. Beamer St.
Woodland, CA 95695-9603

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0783

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

February 28, 1994

Mr. John Margowski
Wickland Properties
P.O. Box 13648
Sacramento, CA 95853

STID 3534

Re: Investigations at the Former Regal Station #404, located at
5901 MacArthur Blvd., Oakland, California

Dear Mr. Margowski,

This office has received and reviewed Western Geo-Engineers' Preliminary Site Assessment report, dated December 2, 1993. Having reviewed the well data from the newly installed on-site well, MW-1, and the three monitoring wells located at 6001 MacArthur Blvd., it appears that these wells are drawing from the same aquifer, and that you can use the off-site wells, together with MW-1, to determine ground water gradient information.

In this initial sampling event, Well MW-1 identified 1,900 parts per billion (ppb) Total Petroleum Hydrocarbons as gasoline (TPHg), 610 ppb TPH as diesel, and 210 ppb benzene. Per Section 2652, Article 5, Title 23 California Code of Regulations, and the Regional Water Quality Control Board's guidelines, you are required to continue quarterly ground water monitoring at the site, until this site is ready for closure. Additionally, you are required to collect monthly water level measurements and conduct corresponding gradient determinations for the initial three months, and then quarterly thereafter.

Quarterly ground water sampling shall include the analysis for TPHg, TPHd, and BTEX.

If ground water samples collected from Well MW-1 continue to identify unacceptable levels of contamination, you will be required to install additional monitoring wells to delineate the extent of ground water contamination. Additionally, further efforts may be required to delineate the extent of soil contamination in the downgradient direction from the former gas USTs, since 310 ppm TPHg was identified from the west wall of the pit in the past.

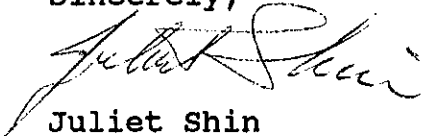
Per my conversation with Mr. George Converse, Western Geo-Engineers, on February 28, 1994, the excavated soil from the waste oil tank removal, approximately 45 cubic yards, is

Mr. John Margowski
Re: 5901 MacArthur Blvd.
February 28, 1994
Page 2 of 2

currently stockpiled on site, directly on top of bare soil. Mr. Converse stated that there are tentative plans to bio-treat this soil, and reuse it on site. If this work is implemented, confirmatory soil samples must be collected from beneath the area where this soil is stored, in addition to being collected from the actual stockpile, before this aspect of site investigations can be considered for closure.

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

Sincerely,



Juliet Shin
Hazardous Materials Specialist

cc: George Converse
Western Geo-Engineers
1386 E. Beamer St.
Woodland, CA 95695-9603

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0783

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

August 25, 1993

Mr. John Margowski
Wickland Oil Company
P.O. Box 13648
Sacramento, CA 95853-4648

STID 3534

Re: Investigations at Regal Station #404, located at 5901
MacArthur Blvd., Oakland, California

Dear Mr. Margowski,

Per a conversation between Mr. Converse, Western Geo-Engineers, and myself on April 21, 1993, Wickland Corporation requested that it postpone installing a monitoring well at the above site until Quik Stop installs its wells. It appears that Quik Stop's wells have now been installed. This office is requesting that you submit a timetable for scheduled work at the site within 10 days of the date of this letter.

Additionally, this office is concerned about the potential impact to ground water from the former waste oil tank. Although fairly low concentrations of diesel were identified in the soil samples collected from beneath the tank and the stockpiled soil, a very large hole was noted in the tank, and a sheen was noted on the pit water and an odor from the pit. Due to our concern, this office is requesting that you include a diesel analysis in the first round of ground water sampling at the site.

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

Sincerely,


Juliet Shin
Hazardous Materials Specialist

cc: George Converse
Western Geo-Engineers
1386 E. Beamer St.
Woodland, CA 95695-9603

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0783

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

April 21, 1993

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

Mr. John Margowski
Wickland Oil Company
P.O. Box 13648
Sacramento, CA 95853-4648

STID 3534

Re: Well installation and sampling at former Regal Station
#404, 5901 MacArthur Blvd., Oakland, California

Dear Mr. Margowski,

Per a conversation between George Converse, Western Geo-Engineers, and myself on April 8, 1993, it is acceptable to this office for Wickland Corporation to have only one monitoring well installed at the site and used in conjunction with Quik Stop's proposed monitoring wells only if can be proven that these wells are drawing from the same aquifer. If this cannot be proven, then you will be required to install three monitoring wells on your site.

Per a conversation between Mr. Converse and myself on April 21, 1993, Wickland Corporation is requesting that it postpone installing the monitoring well on the site until Quik Stop installs its wells. According to Mr. Converse, the monitoring well would be installed within one week after Quik Stop installs its wells. This request is acceptable to this office. Please keep in mind that the water samples collected from all the referenced wells need to be collected on the same day, and as close to the same time as possible.

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

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

George Converse
Western Geo-Engineers
1386 E. Beamer St.
Woodland, CA 95695-9603

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0783

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

March 1, 1993

Mr. John Margowski
Wickland Oil Company
P.O. Box 13648
Sacramento, CA 95853-4648

STID 3534

Re: Work plan for Regal Station #404, located at 5901 MacArthur Blvd., Oakland, California

Dear Mr. Margowski,

This office has received and reviewed Western Geo-Engineer's (WEGE) work plan, dated February 26, 1993. Per our conversation on **January 20, 1993**, it was established that Wickland Oil could not tie into the Quik Stop wells because they were located over 100 feet from the Regal Station site. It was also established at that time that three monitoring wells would be required. The work plan is acceptable only with the following changes/reminders:

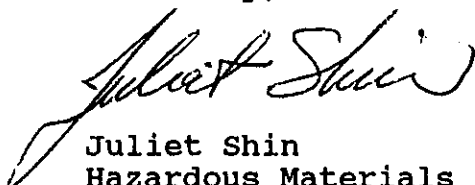
- o You are required to install three monitoring wells at the above site to determine gradient. All three monitoring wells shall be sampled and analyzed quarterly. Water level measurements are to be collected monthly for three consecutive months and quarterly thereafter. Ground water gradients are to be determined and elevation contour maps must be prepared.
- o The wells shall be screened five feet above the water table to accommodate for any seasonal fluctuations in the ground water.
- o A minimum of one soil sample from each boring shall be analyzed.
- o If any contaminants are detected from the waste oil tank pit, the analysis of ground water samples shall include those constituents identified.
- o You are required to wait a minimum of 24 hours after installing the wells before developing them. Additionally, a minimum waiting period of 72 hours is required after developing the wells, before these wells can be sampled.

Mr. John Margowski
Re: 5901 MacArthur Blvd.
March 1, 1993
Page 2 of 2

Field work shall commence within 60 days of the date of this letter. A report documenting the work shall be prepared and submitted 45 days after the completion of field work. A figure indicating the additional proposed well locations must be submitted to this office before the work plan, with the all the above changes/reminders, is implemented.

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

Sincerely,



Juliet Shin
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Darlene Lo
Wickland Corporation
P.O. Box 13648
Sacramento, CA 95815

George Converse
Western Geo-Engineers
1386 E. Beamer St.
Woodland, CA 95695-9603

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0783

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

October 7, 1992

John Margowski
Wickland Corporation
P.O. Box 13648
Sacramento, CA 95815

STID 3534

RE: The site located at 5901 Mac Arthur Blvd., Oakland,
California

Dear Mr. Margowski,

It has recently been noted that an Underground Storage Tank Unauthorized Release (Leak) Report was never submitted to the County after the observed release to soils at the tank removal in 1987. Please complete the attached form and submit it to this office **within 45 days** of the receipt of this letter.

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

Sincerely,

Juliet Shin
Hazardous Materials Specialist

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0783

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

October 5, 1992

John Margowski
Wickland Oil Company
P.O. Box 13648
Sacramento, CA 95853-4648

STID 3534

RE: Required investigations at Regal Station #404, located at 5901
Mac Arthur Blvd., Oakland, California

Dear Mr. Margowski,

In 1987, one 10,000-gallon underground storage tank (UST), one 8,000-gallon UST, and one 6,000-gallon UST were removed from the site. Six soil samples were collected from the native soil, at depths ranging from 13 to 17.5 feet, beneath the USTs. Analysis of one soil sample collected from beneath the 6,000-gallon UST identified 310 parts per million of Total Petroleum Hydrocarbons. Additionally, the geology and hydrogeology information available from neighboring sites suggests that the ground water table is at about 16.5 feet below ground surface.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that a soil and ground water investigation be conducted whenever an unauthorized release of product is suspected from an underground storage tank. The soil contamination and shallow ground water levels would indicate that such an event has occurred.

You are required to conduct a **Preliminary Site Assessment (PSA)** to determine the lateral and vertical extent and severity of latent soil and ground water contamination which may have resulted from the release at the site. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks. The major

Mr. John Margowski
Re: 5901 Mac Arthur Blvd.
October 5, 1992
Page 2 of 4

elements of such an investigation are summarized in the attached **Appendix A**. The major elements of the guidelines include, but are not limited to, the following:

- o At least one groundwater monitoring well must be installed within 10 feet of the tank pit, oriented in the confirmed downgradient direction relative to ground water flow. In the absence of data identifying the confirmed downgradient direction, a minimum of three monitoring wells will be required to verify gradient direction. During the installation of these wells soil samples are to be collected at five foot depth intervals and any significant changes in lithology until ground water is reached.
- o Subsequent to the installation of the monitoring wells, these wells must be surveyed to an established benchmark, with an accuracy of 0.01 foot. Additionally, ground water elevations are to be measured monthly for 12 consecutive months and then quarterly thereafter. Ground water samples are to be collected and analyzed quarterly. Both soil and ground water samples must be analyzed for the appropriate fuel contaminants listed in Table 2 of the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks.

In order to proceed with a site investigation, you should obtain professional services of a reputable environmental consultant. Your responsibility is to have the consultant submit for review a PSA proposal outlining planned activities pertinent to meeting the criteria broadly outlined in this letter and the attached Appendix A.

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

The PSA proposal is due **within 45 days** of the receipt of this letter. Once the proposal is approved, field work should commence

Mr. John Margowski
Re: 5901 Mac Arthur Blvd.
October 5, 1992
Page 3 of 4

within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for final RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter.

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

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

All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. Please include a statement of qualifications for each lead professional involved with this project.

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 RWQCB.

Mr. John Margowski
Re: 5901 Mac Arthur Blvd.
October 5, 1992
Page 4 of 4

If you have any questions or comments, please contact Juliet Shin
at (510) 271-4320.

Sincerely,



Juliet Shin
Hazardous Materials Specialist

Attachment

cc: Richard Hiett, RWQCB

Robert La Grone, Alameda Fire Dept.

Art Morimoto
Alameda County Public Works
399 Elmhurst St.
Hayward, CA 94544

Edgar Howell-File (JS)