

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 4-19-2000
mlace's

201389

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

April 18, 2000
StID # 547

Mr. G. Keith West
General Motors Corporation
Argonaut "A"- 1004H
485 W. Milwaukee Ave.
Detroit, MI 48202

FINAL NOTICE OF VIOLATION

**Re: Request for Technical Reports for White Truck Center, 8099 S. Coliseum Way,
Oakland CA 94621**

Dear Mr. West:

Our office has requested in two previous letters (February 25, 1999 Notice of Violation and August 4, 1999 Second Notice of Violation) that you submit groundwater monitoring reports for the above referenced site. However, to date, our office has not received any reports or communication from General Motors.

As you are aware, our office has previously had an administrative hearing and the Regional Water Quality Control Board (RWQCB) subsequently issued in March 1996 a **Legal Request for the Submittal of Technical Reports** requesting the institution of quarterly monitoring and the submission of quarterly monitoring reports. In addition, our office agreed upon your consultant, Fluor Daniel GTI, in their recommendation of intrinsic bio-remediation and a deed restriction for this site as the most reasonable remediation approach. At a minimum, regular groundwater monitoring is required for this approach.

Please submit a work plan to institute groundwater monitoring to our office within 30 days or no later than May 22, 2000. You should also include the analysis of MTBE in you work plan.

The failure to submit the requested technical report will cause this case to be referred to the Water Board and Alameda County District Attorney's Office for enforcement. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
C. Headlee, RWQCB
Mr. B. Chambers, Alameda County District Attorney Office

FNOV8099

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R01389

August 4, 1999
StID # 547

Mr. G. Keith West
General Motors Corporation
Argonaut "A"- 1004 H
485 W. Milwaukee Ave.
Detroit, MI 48202

ENVIRONMENTAL HEALTH SERVICES

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

SECOND NOTICE OF VIOLATION

**Re: Request for Groundwater Monitoring Reports for White Truck Center,
8099 S. Coliseum Way, Oakland CA 94621**

Dear Mr. West:

This letter follows-up my previous **February 25, 1999 Notice of Violation** regarding the above referenced site. As you are aware, following the underground tank removals at this site in 1993, an extensive subsurface investigation followed. A number of borings around the former underground tanks (gasoline, diesel and waste and virgin oil) were advanced. Borings near the adjacent property operated by Cal Trans and other borings over this site were also advanced to characterize the site. Generally, what was found was that high boiling petroleum contaminants remained in soil and groundwater immediately around for the former diesel and oil tanks. Gasoline and BTEX were less significant near the former tanks, however, on the north side of this site, near an oil-water separator, boring SB-3 identified elevated levels of kerosene. The boring was noticeably saturated with petroleum contamination indicating a release from the separator where the disposal of solvents had occurred.

Technical reports documenting the tank removal and the additional subsurface investigation were not immediately submitted to our office, therefore, a pre-enforcement hearing at our office in December 1995 occurred, where you appeared. As a result, a **Legal Request for the Submittal of Technical Reports** was then issued by the Regional Water Quality Control Board in March 1996. Four items were requested in this report, three of which have been provided to our office. The fourth item requested that you institute quarterly groundwater monitoring and submit them within 45 days of each monitoring event. The Water Board, in their request, advised that the failure to submit the requested reports may result in fines up to \$1,000 per day of delinquency.

In March 1996, eight monitoring wells were installed at the site. Monitoring well MW-3 was located near the oil-water separator. The boring from MW-3, sampled at 10', exhibited very high benzene concentration, although it was not found in the initial groundwater sampling. A feasibility study, a groundwater pump test and a risk assessment were also performed at the site. Given that the petroleum contamination was mainly high boiling fractions in the diesel and motor oil range, your consultant proposed intrinsic bio-remediation along with a deed restriction as the most cost-effective remedial approach. This work was summarized in the **Fluor Daniel GTI January 9, 1997 Risk-Based Corrective Action report**.

Mr. G. K. West
StID # 547
8099 S. Coliseum Way, Oakland CA 94621
August 4, 1999
Page 2.

Our office approved this remedial action plan and also requested that you add specific bio-remediation parameters along with the normal chemical analysis in your quarterly monitoring. Off-site monitoring wells were not required, however, you were to submit a work plan to sample the down-gradient drainage ditch.

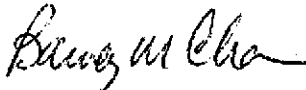
It appears that with the exception of the letter report describing the installation of the monitoring wells in March 1996, no other groundwater sampling or reports have been provided to our office. Therefore, for over three years after the installation of monitoring wells, no monitoring has occurred.

You are requested to perform groundwater monitoring for chemical and bio-remediation parameters within the next 15 days and submit a report within 45 days of the sampling. Your report should be provided to our office no later than September 20, 1999.

The failure to submit the requested report will cause this case to be referred to the Water Board and Alameda County District Attorney's Office for enforcement.

You may contact me at (510) 567-6765 if you have any comments or questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
C. Headlee, RWQCB
Ms. J. Duerig, Alameda County District Attorney Office

2NOV8099



February 25, 1999

Mr. G. Keith West
General Motors Corporation
Argonaut "A"-1004 H
485 W. Milwaukee Ave.
Detroit, MI 48202

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

NOTICE OF VIOLATION

**Re: Request for Groundwater Monitoring Reports for White Truck Center,
8099 S. Coliseum Way, Oakland CA 94621**

Dear Mr. West:

As you are aware, our office reviewed and conditionally approved the **January 9, 1997 Risk-Based Corrective Action of Soil and Groundwater** for the above referenced site as proposed by your consultant, Fluor Daniel GTI. After a Tier 1 and Tier 2 risk-based evaluation of the site and an examination of a number of remediation options, your consultant recommended intrinsic remediation and institutional controls as the most cost effective remedial approach for this site. My February 4, 1997 letter conditionally approved this remediation approach, requested a number of missing reports and comments to a number of other questions relating to "low risk" fuel sites. Fluor Daniel's March 4, 1997 letter replied to my February letter and supplied copies of the requested reports. Groundwater monitoring was stated to begin quarterly on or about March 1997. In addition, the collection of two water samples, up and down gradient of the GMC property from nearby drainage ditch, was proposed.

It is clear that groundwater monitoring supporting the theory that intrinsic bio-degradation is occurring is an essential part of the approved remediation plan for this site. To date, our office has not received any groundwater monitoring reports.

In regards to the work plan for sampling the drainage ditch, please provide copies of the entire report for soil and groundwater samples taken from the off-site, Cal Trans property. This information appeared in figures in the January 7, 1997 Fluor Daniel report, but a complete report was never provided. Based on our evaluation of these results, our office will inform you if the proposed water samples are necessary.

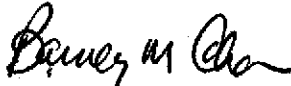
Please submit all past and current groundwater monitoring reports and the above-mentioned report to our office within **30 days or by March 31, 1999.**

This is a formal request for technical reports pursuant to the California Water Code and the Health and Safety Code. Failure to submit the requested reports may subject GMC to civil liability. In addition, Section 2652 (d) of Title 23, California Code of Regulations requires the submittal of reports to the local agency every three months.

Mr. Keith G. West
StID # 547
GMC Truck Center, 8099 S. Coliseum Way, Oakland CA 94621
February 25, 1999
Page 2.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. C. Covert, Fluor Daniel GTI, 4820 McGrath St., Suite 100, Ventura, CA 93003
NOV8099

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#1389

~~October 20, 1998~~

StID # 547

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

Mr. G. Keith West
General Motors Corporation
Argonaut "A"- 1004 H
485 W. Milwaukee Ave.
Detroit, MI 48202

**Re: Request for Technical Reports for White Truck Center, 8099 S. Coliseum Way,
Oakland CA 94621**

Dear Mr. West:

It has come to our office's attention that we have not been receiving quarterly groundwater monitoring reports for the existing monitoring wells at the above site. As you may recall, our office, after the review of a number of reports from GTI, wrote you a June 20, 1997 letter. In the letter, we agreed to accept the Corrective Action Plan (CAP) recommendation of GTI ie monitoring/intrinsic bio-remediation combined with institutional control.

My June 20, 1997 letter requested that quarterly groundwater monitoring be initiated. Specific intrinsic bio-remediation parameters were suggested for analysis from the monitoring wells. I also requested a work plan for the collection of groundwater samples from the drainage ditch as proposed in the Fluor Daniel GTI March 4, 1997 letter.

Please submit all monitoring reports since the March 1996 initial monitoring well installation and sampling report. The reports should evaluate the contaminant trends and make recommendations for the addition of any supplements or further investigation. Remember, implicit in considering this site as a "low risk" groundwater site is adequate site characterization, establishing the stability of the groundwater plume and not migrating and demonstrating that no risk to surface water or other sensitive receptors exist. A groundwater monitoring program must be in place to verify the stability of the plume.

Please submit all requested reports (monitoring and work plans) to our office **within 30 days or by November 23, 1998**. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: Mr. C. Covert, Fluor Daniel GTI, 6573-T Cochran Rd., Cleveland, OH 44139

Reps-8099GMC

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#1389

June 20, 1997
StID # 547

Mr. G. Keith West
General Motors Corporation
Argonaut "A"- 1004 H
485 W. Milwaukee Ave.
Detroit, MI 48202

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

Re: GMC Truck Center, 8099 S. Coliseum Way, Oakland CA 94621

Dear Mr. West:

This letter serves as a follow-up to my February 4, 1997 letter and to comment on the recent March 4, 1997 letter from Mr. Chester Covert of Fluor Daniel GTI. Thank you for the submittal of the requested reports; Sampling and Analysis Report for February and March, 1996. DRAFT April 12, 1996 GTI, 1996b and Aquifer Characterization Report, DRAFT. May 1, 1996.

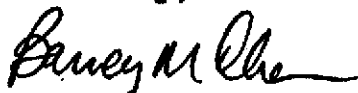
In my February 4, 1997 letter, I questioned whether the above referenced site had met the conditions of a low risk groundwater case as defined by the RWQCB's recommendations. Based upon your consultant's recommendations, our office accepts the proposed remedial approach of monitoring and Intrinsic Bioremediation and institutional control with the following conditions:

- * Please include these additional intrinsic bioremediation parameters to your monitoring program; dissolved oxygen, oxidation-reduction potential, nitrate, sulfate, alkalinity and ferrous iron. If necessary, you should consider supplementing any parameters which are found deficient.
- * Please provide your quarterly groundwater monitoring report which was tentatively scheduled for March 1997. You are reminded that all subsequent monitoring reports should be submitted in a timely fashion.
- * Since the soil impacts typically outweigh groundwater impacts when evaluating risk of volatilization to indoor or outdoor air, your Tier 2 RBCA is being reviewed by our toxicologist without sufficient groundwater data.
- * Please provide a work plan for the collection of groundwater samples from the drainage ditch as proposed in the March 4, 1997 letter.
- * Please be aware that prior to site closure, you must submit a copy and show incorporation of a deed notice or deed restriction regarding the residual contamination at this site.

Mr. G. Keith West
StID #547
8099 S. Coliseum Way
June 20, 1997
Page 2.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
Mr. C. Covert, Fluor Daniel GTI, 6573-T Cochran Rd., Cleveland
OH, 44139
2GMC8099

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#1389

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

February 4, 1997
StID # 547

Mr. G. Keith West
General Motors Corporation
Argonaut "A"- 1004 H
485 W. Milwaukee Ave.
Detroit, MI48202

**Re: Remediation Feasibility Study and Risk-Based Corrective
Action of Soil and Groundwater for White Truck Center,
8099 S. Coliseum Way, Oakland CA 94621**

Dear Mr. West:

Our office has received the January 7, 1997 **Remediation Feasibility Study** and the January 9, 1997 **Risk-Based Corrective Action of Soil and Groundwater** for the above site as prepared by Fluor Daniel GTI. Prior to approving the recommended Corrective Action, monitoring/**Intrinsic Bioremediation combined with Institutional Control (deed restriction)**, our office requests the following:

Please provide copies of the following original reports:

Sampling and Analysis Report for February and March, 1996. DRAFT April 12, 1996 (GTI, 1996b) and

Aquifer Characterization Report. DRAFT. May 1, 1996 (GTI, 1996c)

In addition, please insure that the monitoring well installation report is provided if it is not part of any of the above listed reports. Our office requests copies of **complete technical reports** including boring logs, copies of chain of custody documents, original analytical data et al. If any additional quarterly monitoring reports exist, please provide copies of them.

Your consultant recommends monitoring and **Intrinsic Bioremediation plus Institutional Control (deed restriction)** based upon the submitted **Tier 2 Risk Assessment**. Please keep in mind, this remedial alternative is part of the recommended strategy for a **Low Risk Groundwater Case** as recommended by the

Mr. K. West
StID # 547
GMC Truck Center, 8099 S. Coliseum Way
February 4, 1997
Page 2.

SFRWQCB's Supplemental Instructions to State Water Board December 8, 1995, Interim Guidance on Required Cleanup at Low Risk Fuel Sites. In this report, six criteria for this type case are defined in addition to showing that the site presents no significant risk to human health via a Risk-Based Corrective Action (RBCA) evaluation.

Definition 1 states that the leak has been stopped and ongoing sources, including free product, have been removed or remediated. Please address the previously identified areas of high petroleum contamination or free product and explain why these areas don't act as sources or need remediation.

Definition 2 states that the site has been adequately characterized. This may be the case, however, our office requires the complete technical reports mentioned previously to verify that this is the case.

Definition 3 states the dissolved hydrocarbon plume is not migrating. With only one monitoring event since the installation of wells, it is impossible to make this determination.

Definition 4 states no water wells, deeper drinking water aquifers, surface water, or other sensitive receptors are likely to be impacted. Again, not enough groundwater monitoring has occurred to confirm these conditions. In respect to the conclusion that no surface waters is impacted, without additional monitoring data, it is premature to say that the drainage ditch, which leads to the San Leandro Bay is not at risk. Mere observation for visual evidence of environmental degradation is not sufficient to discount an potential environmental risk nor does it constitute an ecological risk assessment.

Definition 5, states the site presents no significant risk to human health. At this time, the groundwater impact to human health cannot be determined from a single monitoring event. Please initiate quarterly groundwater monitoring. After additional monitoring, representative of a complete hydrogeologic cycle, if the risk assessment is still accurate and valid, it will be evaluated by our staff toxicologist.

Please provide written comment to the above items and provide the requested technical reports within 30 days or by March 3, 1997.

Mr. K. West
StID # 547
GMC Truck Center, 8099 S. Coliseum Way
February 4, 1997
Page 3.

This is a formal request for technical reports pursuant to the California Water Code and the Health and Safety Code. Failure to submit the requested reports may subject GMC to civil liability. In addition, you are reminded that Section 2652 (d) of Title 23, California Code of Regulations requires the owner or operator of USTs which have experienced an unauthorized release of petroleum to submit reports to the local agency every three months. This report should include the results of all investigative monitoring or other corrective actions which have occurred during the reporting period.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

c: Mr. Chester Covert, Fluor Daniel GTI, 4820 McGrath St., Suite
100, Ventura, CA 93003

B. Chan, files
RFS8099

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 1389

RAFAT A. SHAHID, Assistant Agency Director

January 18, 1996
StID #547

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

General Motors Corporation
Mr. Keith West
485 West Milwaukee Ave., Argonaut A 1004
Detroit, MI 48202-3220

Re: Monitoring Well Installation at ⁸⁰⁹⁹8009 S.Coliseum Way, Oakland
CA, 94621, GMC Truck Center

Dear Mr. West:

Our office has received a copy of the December 14, 1995 letter from the Department of Transportation (Cal Trans) denying General Motor's request for access to install two offsite wells. The letter states that this type of work would require approval from their Office of Project Planning and Design and that this would be considered an exceptional request. In reviewing analytical data for this site, it appears that GMC may forgo this activity at this time. If additional offsite subsurface information is needed, temporary borings and sampling will suffice.

Although you have yet to receive the formal request for technical reports subsequent to the December 12, 1995 Pre-enforcement Hearing, please be advised that our office accepts your consultant's remedial approach which includes the installation of monitoring wells, the performance of an aquifer test, the preparation of a baseline risk assessment and the preparation of a feasibility study. Please consider this letter, written approval to install the proposed onsite monitoring wells.

Your prompt submission of all prior technical reports and a formal work plan is necessary to continue the County's oversight. Please feel free to submit these documents prior to the specific deadline as stated in the forthcoming request for technical reports. You may contact me at (510) 567-6765 should you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: Mr. C. Covert, Groundwater Technology, 6573 T Cochran Rd.,
Cleveland OH 44139

G. Jensen, Alameda County District Attorney Office

K. Graves, RWQCB

G. Coleman, files

mws8099

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :
GMC Truck Center
8099 S. Coliseum Way
Oakland CA 94621

Proof of Service of
Notice of Reset of
Pre-Enforcement
Review Panel

I Barney Chan, do hereby certify

that I served Mr. G. Keith West, GM Env. and Energy Staff
Argo A 1004H, 485 W. Milwaukee Ave., Detroit MI 48202

with a copy of the attached Notice of Reset of
Pre-Enforcement Review Panel on November 6, 1995
by certified mailer # P 072 565 846

Dated: 11/06/95

Barney Chan
(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :)
GMC Truck Center)
8099 S. Coliseum Way)
Oakland CA 94621

Notice of Reset of
Pre-Enforcement
Review Panel

Notice is hereby given that upon the motion of the Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board a Reset Review Panel will convene on December 12, 1995 at 10:00 am in the offices of the Alameda County Hazardous Materials Division located at 1131 Harbor Bay Parkway, Room 250, Alameda, CA 94502. This Reset Review Panel will convene for the purpose of determining responsible parties as well as appropriate closure, site assessment, clean-up and mitigation of contamination at the above location.

The Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board have named and served notice of this Reset Review Panel on the following persons or entities as having proposed responsibility for closure, site assessment, clean-up and mitigation of contamination at the above location, and by this notice all parties named herein are informed of the right to appear and show cause, if any they have, for the exclusion or inclusion of any of the parties served herein from said responsibility or obligations:

1. Mr. G. Keith West, GM Env. and Energy Staff

(name)

Argo A 1004 H, 485 W. Milwaukee Ave.,
Detroit, MI 48202

(address)

2. Mr. Harry J. Pearce, EVP and General Counsel GMC

(name)

3044 W. Grand Blvd., Detroit MI 48202

(address)

Dated: November 6, 1995

Barney Olson
(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :
GMC Truck Center
8099 S. Coliseum Way
Oakland CA 94621

Proof of Service of
Notice of Reset of
Pre-Enforcement
Review Panel

I Barney Chan, do hereby certify

that I served Mr. Harry J. Pearce, EVP & General Counsel
GMC, 3044 W. Grand Blvd., Detroit, MI 48202

with a copy of the attached Notice of Reset of
Pre-Enforcement Review Panel on November 6, 1995
by certified mailer # P 072 565 847

Dated: 11/06/95

Barney Chan
(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :) Notice of Reset of
GMC Truck Center) Pre-Enforcement
8099 S. Coliseum Way) Review Panel
Oakland CA 94621

Notice is hereby given that upon the motion of the Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board a **Reset Review Panel** will convene on December 12, 1995 at 10:00 am in the offices of the Alameda County Hazardous Materials Division located at 1131 Harbor Bay Parkway, Room 250, Alameda, CA 94502. This **Reset Review Panel** will convene for the purpose of determining responsible parties as well as appropriate closure, site assessment, clean-up and mitigation of contamination at the above location.

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1. Mr. G. Keith West, GM Env. and Energy Staff
(name)
Argo A 1004 H, 485 W. Milwaukee Ave.,
Detroit, MI 48202
(address)
2. Mr. Harry J. Pearce, EVP and General Counsel GMC
(name)
3044 W. Grand Blvd., Detroit MI 48202
(address)

Dated: November 6, 1995

Lancey Chan
(signature)

**Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division**

In Re The Property Known As :)	Notice of
GMC Truck Center)	Pre-Enforcement
8099 S. Coliseum Way)	Review Panel
Oakland CA 94621)	

Notice is hereby given that upon the motion of the Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board a **Review Panel** will convene on November 22, 1995 at 9:00 am in the offices of the Alameda County Hazardous Materials Division located at 1131 Harbor Bay Parkway, Room 250, Alameda, CA 94502. This **Review Panel** will convene for the purpose of determining responsible parties as well as appropriate closure, site assessment, clean-up and mitigation of contamination at the above location.

The Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board have named and served notice of this **Review Panel** on the following persons or entities as having proposed responsibility for closure, site assessment, clean-up and mitigation of contamination at the above location, and by this notice all parties named herein are informed of the right to appear and show cause, if any they have, for the exclusion or inclusion of any of the parties served herein from said responsibility or obligations:

1. Mr. G. Keith West, GM Env. and Energy Staff

(name)

Argo A 1004 H. 485 W. Milwaukee Ave.,
Detroit, MI 48202

(address)

2. Mr. Harry J. Pearce, EVP and General Counsel GMC

(name)

3044 W. Grand Blvd., Detroit MI 48202

(address)

Dated: October 13, 1995


(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :
GMC Truck Center
8099 S. Coliseum Way
Oakland CA 94621

Proof of Service of
Notice of
Pre-Enforcement
Review Panel

I Barney Chan, do hereby certify
that I served Mr. G. Keith West, GM Env. and Energy Staff
Argo A 1004H, 485 W. Milwaukee Ave., Detroit MI 48202
with a copy of the attached Notice of Pre-Enforcement Review
Panel on October 13, 1995 by certified
mailer # P 368 729 499

Dated: 10/13/95

Barney Chan
(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :
GMC Truck Center
8099 S. Coliseum Way
Oakland CA 94621

Proof of Service of
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Pre-Enforcement
Review Panel

I Barney Chan, do hereby certify
that I served Mr. Harry J. Pearce, EVP & General Counsel
GMC, 3044 W. Grand Blvd., Detroit, MI 48202
with a copy of the attached Notice of Pre-Enforcement Review
Panel on October 13, 1995 by certified
mailer # P 368 729 500

Dated: 10/13/95

Barney Chan
(signature)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01389

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

October 3, 1995
StID # 547

Mr. G. Keith West
GMC
485 West Milwaukee
Argonaut A 1004H
Detroit MI 48202-3220

**Re: Request for Technical Reports for Subsurface Investigation at
8099 S. Coliseum Way, Oakland CA 94621**

Dear Mr. West:

Our office has been in contact with Ms. Bridget Baxter of Groundwater Technology and been informed of the status of the subsurface investigation at the above site. As you may be aware, borings were advanced in March of 1995 and in July 1995 nine additional borings were advanced. To date, nearly three months later, our office has yet to receive the technical report for these activities. Based on these results a Remedial Action Plan (RAP) would then be submitted for the site.

Please submit a technical report for all field activities within 30 days or by November 6, 1995.

You should consider this a formal request for technical reports pursuant to the California Water Code, Section 13267 (b). Failure to submit the requested reports may result in civil penalties and/or the referral of this case to the District Attorney Office for enforcement.

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

Sincerely,

A handwritten signature in cursive script that reads "Barney M. Chan".

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
Mr. Christopher DeSocio, Groundwater Technology, 4057 Port
Chicago Highway, Concord CA 94520

G. Young, files
rep8099

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RO1389

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

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

February 8, 1995
StID # 547

Mr. G. Keith West
GMC
485 West Milwaukee
Argonaut A 1004H
Detroit MI 48202-3220

**Re: Review of Work Plan for Site Assessment at GMC Truck Center,
8099 S. Coliseum Way, Oakland CA 94621**

Dear Mr. West:

Thank you for the submission of the above referenced work plan for your Oakland Truck center site as prepared by Groundwater Technology. Our office has completed its review. In general, we concur with the approach of soil borings, monitoring well and piezometer installations, a pump test and a baseline risk assessment. Work may proceed as soon as possible. Please contact me at least **72 hours prior to all field activities** so I may arrange to be present if possible.

Our office, however, has the following comments/requirements which you may still need to address:

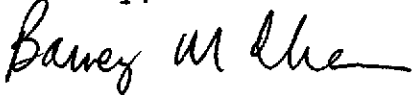
1. Based on the results of soil and groundwater boring results, your consultant will determine the exact locations of the monitoring wells and piezometers. Prior to the installation of the wells and piezometers, please provide a site map depicting these locations for our office's review and concurrence. Our office reserves the right to request groundwater samples from the piezometers also if we deem necessary. As mentioned in the work plan, at least one soil and one water sample should be analyzed per borehole. Please note that the analyses for the samples should be EPA Methods 5030/8015/8020 for gasoline and BTEX and Methods 3550/8015/8020 for TPH diesel through motor oil range.
2. Prior to performing your Baseline Risk Assessment (BRA) you are requested to identify the methods used to perform the BRA and the determined exposure pathways. It may be advisable for our office to meet with you and your consultant prior to performing the BRA to discuss its contents.

Mr. G. Keith West
GMC- 8099 S. Coliseum Way
StID # 547
February 8, 1995
Page 2.

Based on our office's conditional approval it appears that the site investigation may proceed according to the provided schedule. Soil borings may, therefore, be initiated as early as February 16, 1995. Please notify me if there are significant discrepancies from the provided schedule.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: Mr. Christopher DeSocio, Groundwater Technology, 4057 Port
Chicago Highway, Concord CA 94520
E. Howell, files

wpap8099

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0#1389

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

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

January 19, 1995
StID # 547

General Motors Corporation
Mr. G. Keith West
485 West Milwaukee, Argonaut A 1004
Detroit, MI 48202-3220

**Re: Request for Submittal of Work Plan for Remedial Investigation
at GMC Truck Center, ~~8009~~ S. Coliseum Way, Oakland 94621**
8099

Dear Mr. West:

This letter is to follow-up on the phone message I left for you today. Our office requests that GMC submit a work plan for further subsurface investigation for the above referenced site **within 30 days or by February 21, 1995**. Our office has been quite accomodating in allowing you to obtain numerous bids from a number of consultants in the California Bay Area. Recall, no work has occurred at this site since the underground tanks were removed in August of 1993 nearly 1 1/2 years ago. Since then, our office is aware that at least seven different consulting companies have reviewed the site files in September 1994. We feel that GMC has been given ample time to select a consultant and submit a remedial investigation work plan. This work plan should also provide a specific time schedule for its implementation based on the receipt of regulatory agency approval.

Failure to submit the requested document will cause this case to be referred to the District Attorney Office and/or the Regional Water Quality Control Board (RWQCB) for enforcement.

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

Sincerely,

A handwritten signature in cursive script that reads "Barney M. Chan".

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
E. Howell, files
enf8099

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01389

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

July 6, 1994
StID # 547

Mr. G. Keith West
GM Environmental and Energy Staff
485 W. Milwaukee Ave., A-1020A
Detroit, MI 48202

NOTICE OF VIOLATION

**Re: Request for Work Plan for Further Site Assessment for GMC
Truck Center, 8099 S. Coliseum Way, Oakland 94621**

Dear Mr. West:

Our office last wrote to you in our February 3, 1994 letter which requested a work plan for further site assessment. In this letter, I included copies of two documents which detailed the elements of a Risk Assessment and also described "Alternative Points of Compliance", (APC). Please be aware that the term APC has been recently changed to "Nonattainment Zones", though the concept remains the same, the allowance of limited zones of soil and groundwater contamination at a given site with the implementation of an approved management and monitoring plan.

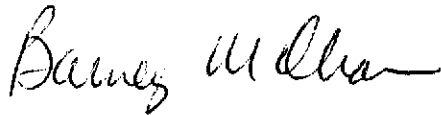
In my February 3, 1994 letter, I requested that a work plan be submitted for further site assessment by March 21, 1994. Our office was also receptive to meeting with you and your consultant to discuss any details of our requirements. To this date, our office has not received any correspondence or communication from you. I understand that your offices are closed until July 18, 1994, therefore, you are requested to either arrange a meeting at our office or provide an acceptable work plan for additional site assessment within 30 days of that date or by August 22, 1994.

Please be aware that this is a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to provide the requested documents may subject General Motors Corporation to civil liability and cause this case to be referred for enforcement.

Mr. Keith West
StID # 547
8099 S. Coliseum Way
July 6, 1994
Page 2.

You should also be aware that our offices have change locations to: **1131 Harbor Bay Parkway, Second Floor, Alameda CA 94502.** In addition, until our phone system is up and running, you may leave a voice message for me by dialing (510) 271-4310.

Sincerely,



Barney M. Chan,
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
E. Howell, files
NOV8099

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01389

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

February 3, 1994
StID # 547

Mr. Keith West
GMC
2860 Clark St.
Detroit, MI 48232

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: Status of Subsurface Investigation at 8099 S. Coliseum Way
Oakland CA 94621**

Dear Mr. West:

In response to your interest in proposing a Risk Assessment as part of the investigation/remediation approach to the above site, enclosed please find two documents which may help you and your consultant. These documents are the Risk Based Management of Contaminated Sites by R. Arulanantham and excerpted pages from the Ground Water Basin Plan Amendments from our Regional Water Quality Control Board (RWQCB). The second document gives the Water Board's acceptance of "Alternative Points of Compliance", which acknowledges sites may have residual contamination as long as an acceptable plan for managing the remaining risks posed by residual contamination is implaced.

Enclosed, is the business card of our Staff Toxicologist, Mr. R. Arulanantham. I have informed him of your desire to meet and discuss the requirements for a Risk Assessment. Please confirm the date and time when you would like to meet with us. I encourage you to call Mr. Arulanantham yourself to expedite the arrangement of this meeting since his schedule is quite demanding.

Assuming that the requirements for a Risk Assessment and Alternative Points of Compliance are understood, you should provide a work plan for the further investigation of the above referenced site **within 45 days or by March 21, 1994**. This assumes your request to meet on February 10, 1994 is still valid. You should contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

enclosures

cc: R. Arulanantham, RWQCB, 2101 Webster St., Suite 500, Oakland
94612

E. Howell, files 2wp8099

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01596

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 8, 1993

Jack Scholl
Mostly Mustangs
2576 Martin Luther King Jr. Way
Oakland, CA 94612

STID 1089

Subject: 90 day Compliance Letter

Dear Jack Scholl:

On September 29, 1993, your file was reviewed by State Water Resources Control Board staff with the Underground Storage Tank Cleanup Fund Program (Cleanup Fund). The purpose of their review was to determine if you are in compliance with corrective action orders and directives is a requirement for reimbursement of cleanup costs from the Cleanup Fund.

As a result of their review, it has been determined that you are currently not in compliance because of lack of investigation.

For cases such as yours, the Cleanup Fund is providing responsible parties with an opportunity to come into compliance provided the regulatory agency will issue a revised corrective action directive. You must take positive concrete steps to come into compliance.

Please refer to the attached memorandum from the Cleanup Fund regarding their requirements before a Letter of Commitment can be issued obligating funds to assist you with the cleanup of your site.

Accordingly, pursuant to **Section 13267 (b) of the California Water Code**, you are hereby directed to begin the necessary work at your site within 90 calendar days from the date of this letter. The required work shall include:

1. you have not done begun a soil and groundwater investigation,
2. you have not submitted quarterly reports of your actions on the site.

Jack Scholl
2576 Martin Luther King Jr. Way, Oakland
STID 1089
Page 2 of 2

Please be aware, that pursuant to Title 23, Division 3, Chapter 16, Article 11 of the California Code of Regulations you are required to have any approved workplan prior to initiation of any work. In addition, you are to provide a status report of all activities, including the progress, of this case every 90 days. All correspondence, workplans and reports are to be submitted to this office.

If you have any questions regarding the provisions of this letter and/or the necessary work at the site, please call me at 271-4530.

Sincerely,



Thomas F. Peacock, Supervising HMS
Hazardous Materials Division

cc: Edgar B. Howell, Chief - files
State Water Resources Control Board, Clean-up Fund

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01389

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

September 20, 1993
StID # 547

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. Keith West
GMC
2860 Clark St.
Detroit, MI 48232

**Re: Request for Technical Reports Associated with the Subsurface
Investigation at 8099 S. Coliseum Way, Oakland CA 94621**

Dear Mr. West:

Thank you for the submittal of the Clayton Environmental Report detailing soil and groundwater results from borings advanced on the GMC property adjacent to the underground still in place at the Cal/Trans site located at 555 Hegenberger Rd. This information has been transmitted to Ms. Barbara Webb of Cal/Trans and requested priority response.

In regards to the tank removals performed at the 8099 S. Coliseum Way site, I spoke with Mr. Mike Holbrook of Clayton Environmental on 8/16/93. He stated that up to 15,000 ppm diesel and 2000 ppm Total Oil and Grease were found in soil samples from the tank removal. Mr. Tony McElligott of Clayton informed me that they had recently sent results from the tank removal, however, I have not been able to locate them. In addition, Clayton has also performed borings and taken soil and groundwater samples around the two tank pit areas in an attempt to determine the limits of petroleum contamination. Field results indicate that they were unable to determine these limits, therefore, additional borings will be required. Normally, after being informed of confirmed petroleum release, the responsible party is notified and a request for a work plan for subsurface investigation is made. Mr. McElligott stated that until the full extent of soil and groundwater contamination is determined, a work plan cannot be developed. He stated that a step wise excavation approach would likely be recommended after determining the extent of contamination. This approach is acceptable to our office as long as we are kept aware of activities at this site. Please notify our office **48 working hours** prior to performing additional work.

Please provide a copy of the results from both the initial tank removals plus the results of the most recent borings. Also provide, if possible, a schedule for future subsurface investigation including borings, monitoring well installation, etc.

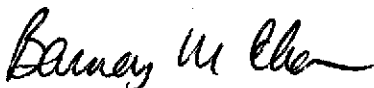
Mr. Keith West
StID # 547
8099 S. Coliseum Way
September 20, 1993
Page 2.

Enclosed please find an Underground Storage Tank Unauthorized Release (Leak)/ Contamination Site Report to be completed by you or your designee. Please provide the requested reports and forms to our office **within 30 days, or by October 25, 1993**. As soon as possible, you should also provide a specific remedial action plan plus a monitoring well installation proposal.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to provide the requested reports may subject GMC to civil liability.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

enclosure, (Mr. West)

cc: G. Jensen, Alameda County District Attorney Office
T. McElligot, Clayton Environmental Consultants, 1252 Quarry
Lane, P.O. Box 9019, Pleasanton, CA 94566
E. Howell, files

wp-8099SC

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R01389

September 19, 1990

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

H E (Bud) West
GMC Truck & Bus Group
8099 Coliseum Way
Oakland, CA 94621

Re: Waste Minimization Assessment

Dear H E (Bud) West:

Your business has been selected to receive a hazardous waste minimization assessment. As you are probably aware, hazardous waste reduction has become a statewide, if not a national, issue. To address this issue at a county level, Alameda County is establishing its own Hazardous Waste Minimization Program and is planning to conduct waste minimization assessments for all hazardous waste generating facilities in the County.

We have chosen businesses in the auto repair industry to receive the first round of waste minimization assessments. It is our hope that these assessments will assist participating businesses in minimizing their hazardous wastes - and will give us further information on the best way to structure our minimization program.

One of our Hazardous Materials Specialists will be contacting you during the week of September 24 to arrange a meeting with you for an assessment of your business. During this meeting and assessment, the Specialist will work with you in examining your business's hazardous waste generating practices. The Specialist will then provide you with materials on waste reduction technology and assist you in setting up appropriate hazardous waste minimization practices.

We look forward to working with you in reducing the amount of hazardous waste your business generates. Of course, your comments and suggestions are encouraged; we need your input in order to best serve you! Please direct any comments and questions to Katherine Chesick at 415/271-4320.

Sincerely,

Edgar B. Howell, Chief,
Alameda County Hazardous Materials Division

EBH:kac

cc: Fire Department
Files