

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

SENT
02-24-06

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

February 23, 2006

Werner R. and Irmgard S. Schropp
C/o Richard Jones
Agriculture Industries, Inc.
P.O. Box 1076
West Sacramento, CA 95691-1076

Subject: SLIC Case No. RO0002473, Schropp Ranch – Western Property, 3880 Mountain House Road, Byron, CA 94514 – Request for Monitoring Well Decommissioning

Dear Mr. Jones:

Alameda County Environmental Health (ACEH) and California Regional Water Quality Control Board staff have reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file and case closure summary for the above-referenced site and concur that no further action related to the underground storage tank fuel release is required at this time. Prior to issuance of a case closure letter, the monitoring wells at the site are to be properly decommissioned, should the monitoring wells have no further use at the site. Please decommission the monitoring wells and provide documentation of the well decommissioning to this office. A case closure letter will be issued following receipt of the documentation.

Well destruction permits may be obtained from the Zone 7 Water Agency (<http://www.zone7water.com>). If you have any questions, please call me at (510) 567-6791.

Sincerely,

Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Stephen Muir, P.O. Box 152, Woodbridge, CA 95258

Matt Katen, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway, Livermore, CA 94551

Donna Drogos, ACEH
Jerry Wickham
ACEH File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
02-28-06

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

February 23, 2006

Werner R. and Irmgard S. Schropp
C/o Richard Jones
Agriculture Industries, Inc.
P.O. Box 1076
West Sacramento, CA 95691-1076

Subject: SLIC Case No. RO0002473, Schropp Ranch – Western Property, 3880 Mountain House Road, Byron, CA 94514

Dear Mr. Jones:

In order for ACEH to complete regulatory oversight for your site, we require an additional deposit to the oversight account for the above-referenced site. Please send a check in the amount of \$1,250.00 payable to Alameda County Environmental Health. Please send your check to the attention of our Finance Department.

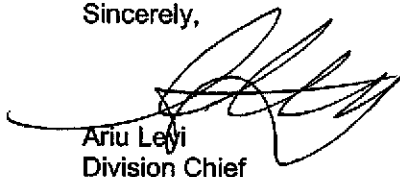
This deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project is being debited at the Ordinance specified rate, currently \$166.00 per hour.

Please write "SLIC" (the type of project), the site address, and the AR#0305987 on your check.

If you have any questions, please contact Jerry Wickham at (510) 567-6791.

Sincerely,



Ariu Leyi
Division Chief

cc: D. Drogos, J. Jacobs, Jerry Wickham

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SEM
02-15-06

February 10, 2006

Mr. Dzuong Duy Le
C/o Timmy Nguyen
3345 Grand Avenue
Oakland, CA 94610

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

Subject: SLIC Case RO0002475, JB Auto, 819 E. 12th Street, Oakland, CA

Dear Mr. Le and Mr. Nguyen:

Our records indicate that the current balance on the above-referenced SLIC oversight account is a negative \$2,909.00. In order to continue to provide regulatory oversight, we are requesting the submittal of a check made payable to Alameda County Environmental Health in the amount of \$6,000.00. Please send your check to the attention of our Finance Department.

This initial deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project is being debited at the Ordinance specified rate, currently \$166.00 per hour.

Please write "SLIC" (the type of project), the site address, and the AR# 0305998 on your check.

If you have any questions, please contact Jerry Wickham at (510) 567-6791.

Sincerely,


Ariu Levi
Division Chief

cc: Robert Mintz, 3215 Clement Street, Suite 203, San Francisco, CA 94121

Mark Detterman, Blymyer Engineers, Inc., 1829 Clement Avenue, Alameda, CA 94501

D. Drogos, J. Jacobs, Jerry Wickham

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
02-09-06

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

February 8, 2006

David Stavarek
RWQCB
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Subject: SLIC Case No. RO0002473, Schropp Ranch, 3880 Mountain House Road, Byron, CA

Dear Mr. Stavarek:

Based on your request, enclosed is one copy of the report entitled, "Final Problem Assessment Report and Closure Request Document," dated November, 2004 for the above referenced site.

If you have any questions, please call me at (510) 567-6791.

Sincerely,


Jerry Wickham, P.G.
Hazardous Materials Specialist

Enclosure: Final Problem Assessment Report and Closure Request Document," dated November, 2004

cc: Donna Drogos, ACEH (w/o enclosure)
Jerry Wickham, ACEH (w/o enclosure)
File (w/o enclosure)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



305T
02-09876

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

February 8, 2006

Denis Brown
Shell Oil Products US
20945 S. Wilmington Ave.
Carson, CA 90810-1039

Major Brand Gas, Inc.
C/o Gursharnjeet Cheema
1060 St. Raphael Drive
Bay Point, CA 94565

Subject: Fuel Leak Case No. RO0000428, Shell, 350 Grand Avenue, Oakland, CA

Dear Mr. Brown and Mr. Cheema:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the report entitled, "Site Investigation Report," dated December 2, 2005, prepared on behalf of Shell by Cambria Environmental Technology, Inc. The report presents the results of a site investigation that included soil borings near the dispenser islands and storm drain in Perkins Street and one CPT boring in the vicinity of well S-2.

Based on the limited lateral extent of the groundwater plume and declining concentrations in well S-2, the report recommends conducting an evaluation for closure. ACEH concurs with conducting an evaluation for case closure. We request that you perform the proposed work and send us the reports described below.

TECHNICAL REPORT REQUEST

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

- **April 17, 2006** – Evaluation for Closure

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

ELECTRONIC SUBMITTAL OF REPORTS

Effective January 31, 2006, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and

Denis Brown
Gursharnjeet Cheema
February 8, 2006
Page 2

will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

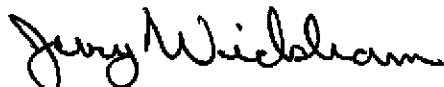
Denis Brown
Gursharnjeet Cheema
February 8, 2006
Page 3

AGENCY OVERSIGHT

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

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

cc: Ana Friel
Cambria Environmental Technology, Inc.
270 Perkins Street
Sonoma, CA 95476

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



9-25-03

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

RO0002473

September 24, 2003

Mr. Richard Jones
Agriculture Industries, Inc.
P.O. Box 1076
West Sacramento, CA 95691

RE: Work Plan Approval for Deep Aquifer Investigation at 3880 Mountain House Rd, Byron, CA

Dear Mr. Jones:

I have completed review of Stephen Muir's August 25, 2003 *Deep Aquifer Site Assessment Workplan for Petroleum Hydrocarbon Contaminated Groundwater* prepared for the above referenced site. The proposal to advance two soil borings to an approximate depth of 75 feet bgs to test the second water-bearing zone is acceptable. A Sensitive Receptor Survey within a 2,000-foot radius of the site will also be conducted.

Field work should commence within 60 days of the date of this letter, or by **November 24, 2003**. Please provide at least 72 hours advance notice of field activities. If you have any questions, I can be reached at (510) 567-6762 or by email at echu@co.alameda.ca.us.

eva chu
Sr. Environmental Health Specialist

c: Donna Drogos

email: James Barton, CV-RWQCB
Stephen Muir

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



905-03

RO0002473

September 24, 2003

Mr. Richard Jones
Agriculture Industries, Inc.
P.O. Box 1076
West Sacramento, CA 95691

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

RE: Project Add-on for Schropp Ranch, 3880 Mountain House Road, Byron, CA 94514

Dear Mr. Jones:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To date, approximately \$1600.00 has been charged to your account (total deposit of \$750 has been received). To replenish the account, please submit an additional deposit of \$3000.00, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested, or any unused monies will be refunded to you or your designee.

The deposit/refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$158 per hour.

Please be sure to write the following identifying information on your check or cover letter:

project # RO0002473
type of project (site mitigation, add-on), and
site address (3880 Mountain House Road, Byron)

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

eva chu
Sr. Environmental Health Specialist

c: Donna Drogos

schroppranch-4

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



07-14-03

RO0002473

July 11, 2003

Mr. Richard Jones
Agriculture Industries, Inc.
P.O. Box 1076
West Sacramento, CA 95691

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

RE: Deep Aquifer Investigation at 3880 Mountain House Rd, Byron, CA

Dear Mr. Jones:

I have completed review of Stephen Muir's April 2003 *Final Problem Assessment Report (PAR) and Closure Request Document* prepared for the above referenced site. This report summarized activities conducted at the site to remediate hydrocarbon-impacted soil due to a former leaking underground storage tank (UST). Below are my technical comments:

- Table 2 of the PAR lists groundwater analytical data for sample 001 (Feb 4, 1992) containing 0.20ug/L TPHg and Non Detect for BTEX constituents. And in Nov 11, 1992, Well Sample #1 contained 79ug/L TPHg, 7.05ug/L benzene, etc. Please clarify if these are water samples collected from the former water supply well (2S/3E-6F1) located in the vicinity of the former UST or from another well. And please clarify if SRW and Schropp Well designations are for well 2S/3E-6F1.
- If the former water supply well was impacted by the gasoline release at the site, the extent of contamination in the deep aquifer must be delineated. If this is the case, a workplan for the required investigation is due within 45 days of the date of this letter, or by August 25, 2003.

Be advised that I am no longer working in the LOP/SLIC program. I may or may not be able to continue to provide regulatory oversight for this site to case closure. If the case is assigned to a new caseworker, you will be notified. Otherwise, you may continue to send correspondence to my attention. If you have any questions, I can be reached at (510) 567-6762 or by email at echu@co.alameda.ca.us.

eva chu
Sr. Environmental Health Specialist

c: Donna Drogos
CV-RWQCB, 3443 Routier Rd, Suite A, Sacramento, CA 95827-3098
email: Stephen Muir

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



01-16-01

RO2473

StID 4293

January 16, 2001

Mr. Richard Jones
Agriculture Industries Inc.
P.O. Box 1076
West Sacramento, CA 95691

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

**RE: Project #1871A, Add-on
at Schropp Ranch, 3880 Mountain House Road, Byron, CA 94514**

Dear Mr. Jones:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$750.00, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested, or any unused monies will be refunded to you or your designee.

The deposit/refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$105 per hour.

Please be sure to write the following identifying information on your check:

project #1871/ Stid #4293
type of project (site mitigation, add-on), and
site address (3880 Mountain House Road, Byron)

Mr. Steven Muir at WZI will be providing reports to complete our file. I will then review the case to determine if site closure can be recommended. If you have any questions, please contact me at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Steven Muir, WZI, 470 East Herndon Ave., Suite 203, Fresno, CA 93720

shroppranch-1

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02473

RAFAT A. SHAHID, Assistant Agency Director

September 16, 1993

Richard G. Jones
Agriculture Industries Inc.,
P.O. Box 1076, 3002 Beacon Blvd.,
West Sacramento, CA 95691

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

Subject: Schropp Ranch, 3880 Mountain House Rd., Byron CA

Dear Mr. Jones:

This office has received the "Interim Project Report and Request for Modification of Workplan", for the above site, dated August 31, 1993, from WZI Inc. (WZI), your consultant of record. Thank you for informing this office of any potential changes in the approved workplan.

Upon review of the document, and following telephone communication with WZI, this office concurs with your request to return soils that were removed from the excavated pit. These soils were either treated by aeration approved and permitted by the governing Air Board, or found to be Non-Detect (ND) for Total Petroleum Hydrocarbons and BTEX constituents.

Please be advised that a workplan summary must be forwarded to this office outlining the procedure used to verify the ND characterization of the soils to be returned. According to Steve Muir, of WZI, there have been at least 50 laboratory samples analyzed for their constituents.

In so far as the request to backfill the site with soil with concentrations above the ND limit, such a request should be directed to the Central Valley Regional Water Quality Control Board as this would technically, constitute a "discharge".

Please call this office if you have any questions concerning the site. The number is (510) 271-4320.

Sincerely,

Brian P. Oliva, REHS, REA
Hazardous Materials Specialist

cc: Steve Muir, WZI Inc., Box 9217, Bakersfield, CA 93389
Gorden Boggs, CVRWQCB

BK

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02473

RAFAT A. SHAHID, Assistant Agency Director

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

September 22, 1992

Richard G. Jones
Agriculture Industries Inc.,
P.O. Box 1076, 3002 Beacon Blvd.,
West Sacramento, CA 95691

Subject: Schropp Ranch, 3880 Mountain House Rd., Byron CA

Dear Mr. Jones:

This office has received the "Response to Comments" dated September 8, 1992 from WZI Inc. (WZI), your consultant of record. Thank you for addressing the required comments in a timely manner and submitting the response to this office.

Upon review of the submitted response, this office concurs with the workplan as amended. You may begin implementing the workplan as soon as possible.

Please give this office forty-eight (48) hours notice prior to any work commencing at the site.

If you have any questions, please call this office. The number is: (510) 271-4320.

Sincerely,

Brian P. Oliva, REHS
Hazardous Materials Specialist

cc: Steve Muir, WZI, Inc., 21030 N. Davis Rd., Lodi, CA 95242
Gorden Boggs, CVRWQCB, Sacramento, CA
Edgar Howell-file

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02473

RAFAT A. SHAHID, Assistant Agency Director

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

August 24, 1992

Ms. Bertie Humpreries
CVRWQCB
3443 Routier Road
Sacramento, CA 95827

Subject: Schropp Ranch, 3880 Mountain House Rd., Byron, CA 95691

Dear Ms. Humpreries:

Enclosed you will find a copy of the "Underground Storage Tank Unauthorized Release (LEAK)/Contamination Report", reported by Steve Muir, from WZI Inc(WZI). The report is from the aforementioned subject site. I will "cc" the owner to make them aware that you have been sent a copy of the report.

If you have any questions, please call this office. The telephone number is (510) 271-4320.

Sincerely,

Brian P. Oliva, REHS
Hazardous Materials Specialist

cc: Richard Jones, Agriculture Industries Inc., P.O. Box 1076,
Sacramento, CA 95691
Steve Muir, WZI Inc., 21030 N Davis Rd., Lodi, CA 95242

enclosures: URF, dated 04/22/92

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02473

RAFAT A. SHAHID, Assistant Agency Director

August 19, 1992

Richard G. Jones
Agriculture Industries Inc.,
P.O. Box 1076, 3002 Beacon Blvd.,
West Sacramento, CA 95691

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

Subject: Schropp Ranch, 3880 Mountain House Rd., Byron CA

Dear Mr. Jones:

This office is in receipt of the "Site Assessment and Phased Remediation Work Plan", dated June, 1992, and submitted by WZI Inc(WZI), your consultant of record. Thank you for the prompt submission of the document.

Upon review of the workplan, there are several points in need of clarification prior to concurrence by the Alameda Division of Hazardous Materials:

- 1) This report is a "phased plan", that does not contain all the steps required to complete the subsurface investigation. It will be necessary to submit a more detailed work plan upon completion of the initial excavation and sampling rounds.
- 2) The soil may be characterized by and Organic Vapor Analyzer(OVA), however the final plan for sampling the stockpiled soil remove from the pit must include laboratory analysis completed by a State Certified Laboratory.
- 3) Please indicate the soil strata in the area and provide this office with the hydrogeologic setting for the area.
- 4) Upon completion of the preliminary phase of soil removal, include a plan for the placement of the monitoring wells.
- 5) Submit copies of the BAAQMD (Air Quality District) permits for soil aeration to this office.
- 6) The soil sampling plan calls for the use of "duct tape" to seal the ends of the sampling tubes after the soil has been removed from the surface. There is evidence that the duct tape may cause a "false-positive" reading for Toluene, one of the constituents of petroleum products. Please provide an alternate means of sealing the sample collection tubes.

page 2 of 2

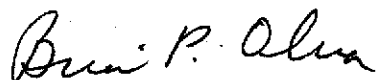
7) The "Water Remediation Plan", indicates that the water removed from the pit will be discharged onto the surface in and "unlined, upgradient trench, on the property where it will be allowed to infiltrate, or it will be applied to the soil remediation pile". You must either obtain a NPDES permit (National Pollutant Discharge Elimination System), or a "Discharge Variance" from the Regional Water Quality Control Board prior to any such discharge onto the surface.

Upon completion of an addendum clarifying the above issues stated, this office will concur with the work plan and you may commence site work.

Please give this office forty-eight (48) hours notice prior to beginning any work at the site

If you have any questions please contact this office at (510) 271-4320.

Sincerely,



Brian P. Oliva, REHS
Hazardous Material Specialist

cc: Steve Muir, WZI. Inc., 21030 N. Davis Rd., Lodi, Ca 95242
Gordon Boggs, CVRWQCB, Sacramento, CA
LS.