ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
DAVID J. KEARS, Agency Director

SCVT 83-1506

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

March 14, 2006

Mr. Glen Poy-Wing
Oakland Auto Works
240 West MacArthur Blvd.
Oakland, CA 94611-5350

Mr. Warren Dodson
Dodson Limited
1323 South Flower Street
Los Angeles, CA 90015

Subject: Fuel Leak Case No. RO000142, Dodson Ltd., 240 West MacArthur Blvd., Oakland, CA – Work Plan Approval

Dear Mr. Poy-Wing and Mr. Dodson:

I am the case worker recently assigned to your case. Please send future correspondence regarding this case to my attention. Alameda County Environmental Health (ACEH) has reviewed the case file for the above-referenced site and the document entitled "Workplan for Additional Site Characterization and Interim Remedial Action," dated March 14, 2006. The Work Plan describes a scope of work to advance two off-site borings and nine on-site borings. ACEH concurs with the proposed scope of work described in the Work Plan provided that the technical comments below are addressed during the field investigation.

We request that you address the technical comments below, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@acgov.org) prior to the start of field activities.

**TECHNICAL COMMENTS**

1. **Proposed Locations of Soil Borings and Piezometers.** ACEH concurs with the proposed locations of soil borings BH-22 through BH-31. ACEH requests that proposed boring BH-32 be moved to a location approximately midway between boring BH-21, proposed boring BH-31, and monitoring well MW-1. Please see technical comment 2 regarding the depth of proposed borings BH-31 and BH-32.

2. **Depth of Proposed Soil Borings.** ACEH concurs with proposed sampling depths for borings BH-22 through BH-30. The Work Plan proposes to advance soil borings SB-31 and SB-32 to a depth of approximately 27-28 feet below ground surface (bgs) and collect one soil sample at the base of the boring. ACEH concurs with the collection of soil samples at approximately 27 feet bgs in each boring. However, ACEH requests that the borings be extended to a depth of 32 feet bgs and a second soil sample collected at approximately 32 feet bgs. The sampling depths may be revised in the field based on observations of

staining, odor, or elevated photoionization detector readings. If a sand or gravel water-bearing layer is encountered in borings BH-31 or BH-32 within the interval from approximately 25 to 32 feet bgs, we request that a second boring be advanced to collect a grab groundwater sample from the sand or gravel water-bearing layer. Please present the results of the sampling in the Subsurface Investigation Report requested below.

3. **Hydrogeologic Cross Sections.** The series of hydrogeologic cross sections are highly useful in the interpretation of subsurface conditions and should be updated in future reports as additional data are collected. Please check the 24" SS sanitary sewer line depicted on cross section B-B' as the 24" SS line appears to be south of cross section B-B' under MacArthur Boulevard.

4. **Interim Remedial Action Plan.** ACEH concurs with the proposal to evaluate interim remedial actions based on the results of the proposed investigation. Please submit an Interim Remediation Plan as requested below.

## TECHNICAL REPORT REQUEST

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

- **May 15, 2006** – Quarterly Monitoring Report for First Quarter 2006
- **July 17, 2006** – Subsurface Investigation Report
- **August 1, 2006** – Interim Remedial Action Plan
- **August 15, 2006** – Quarterly Monitoring Report for Second Quarter 2006

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 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).

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.

**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
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Bruce Rucker
Stellar Environmental Solutions, Inc.
2198 Sixth Street, Suite 201
Berkeley, CA 94710

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
DAVID J. KEARS, Agency Director

SENT
10-27-04

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

October 27, 2004

Glen Poy-Wing
Oakland Auto Works
240 W. MacArthur Blvd.
Oakland, CA 94611

Dear Mr. Poy-Wing:

Subject: Fuel Leak Case No. RO0000142, Oakland Auto Works, 240 W. MacArthur Blvd., Oakland, CA 94611

Alameda County Environmental Health (ACEH) staff "Soil and Groundwater Investigation Report" dated June 8, 2004 by Stellar Environmental Solutions. This report includes a preferential pathway survey, a water supply well survey, and the drilling of boreholes beneath the former underground storage tank locations and along the perimeter of the property. A Corrective Action Plan (CAP) was recommended. We feel that a CAP would be premature since delineation of the contaminant plume has not been completed. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

1) Borehole Groundwater Analytical Results map – Cumulative BTEX concentrations are shown. Instead, please distinguish benzene concentrations. Please submit a revised map.
2) Site Characterization - 26,800 micrograms/liter (ug/l) TVHg detected in downgradient borehole BH-16. 68,300 ug/l TVHg, 617 ug/l benzene, 548 ug/l methyl tertiary butyl ether (MTBE), detected in BH-13. The lateral extent of your dissolved contaminant plume is still undefined. Please propose additional sampling locations to define the plumes associated with your site in the Work Plan requested below. Using the geologic cross-sections with soil and groundwater analytical results, utility conduits, well screens, etc., and explain your rationale for the additional sampling locations. You may want to consider performing an investigation to quickly define the location of the contaminant plume downgradient from the release site prior to installing the permanent monitoring network. That will allow you to optimize the location and depth of the permanent wells, thereby reducing the cost of the monitoring work. Collection of groundwater samples using a one-time direct push water sampling tool would be appropriate for this investigation.
3) Source Characterization - 122,000 ug/l TVHg and 10,000 ug/l TVHg have been detected in boreholes BH-20 and BH-19, respectively. Thus, the source area has not been vertically delineated. We request that you propose additional

borings to delineate the vertical extent of soil contamination in the source area in the Work Plan requested below.

4) Preferential Pathway Survey - The sanitary sewer lines located beneath Howe Street and W. MacArthur Boulevard could be installed within trenches backfilled with more permeable sand at depths which there is reasonable potential for groundwater to intersect the lines. Therefore, it must be determined if the contaminant plumes encountered the sanitary sewer lines spreading the contamination, particularly in the vertical direction to deeper water aquifers. Please submit a proposal with the Work Plan requested below.
5) Interim remedial action plan – We feel that a CAP would be premature. However, an interim remedial action plan may be proposed.
6) Historical Groundwater Monitoring Well Analytical Data - The data for MW-8 Jun-04 was a typo (Mar-04's data was duplicated). Please correct.
7) Borehole Groundwater Depths - Only first encountered depths were noted. Static depths will be required in future boreholes.

TECHNICAL REPORT REQUEST

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

December 27, 2004 - Work Plan
January 31, 2005 - Fourth Quarter 2004 Groundwater Monitoring Report
April 30, 2005 – First Quarter 2005 Groundwater Monitoring Report
July 31, 2005 - Second Quarter 2005 Groundwater Monitoring Report
October 31, 2005 - Third Quarter 2005 Groundwater Monitoring Report

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Bruce Rucker, Stellar Environmental Solutions, 2198-6th St., Suite 201, Berkeley, CA 94710
Donna Drogos
File

ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
DAVID J. KEARS, Agency Director

SENT 5-4-04

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

May 3, 2004

Glen Poy-Wing
Oakland Auto Works
240 W. MacArthur Blvd.
Oakland, CA 94611

Dear Mr. Poy-Wing:

Subject: Fuel Leak Case No. RO0000142, Oakland Auto Works, 240 W. MacArthur Blvd., Oakland, CA 94611

Alameda County Environmental Health (ACEH) staff met with you, and Bruce Rucker and Richard Makdisi of Stellar Environmental Solutions on April 28, 2004, to discuss the information and proposals stated in "Amended Workplan for Additional Site Characterization" dated December 10, 2003, "Workplan for Additional Site Characterization" dated August 20, 2003, both by Stellar Environmental Solutions, and related correspondence. The Workplan was approved with the following changes:

1) The total number of boreholes in the sidewalk on Howe St. will be increased to at least four, equally spaced between proposed boreholes BH-17 and BH-19.
2) In the source area, at least one borehole will be drilled to the impervious layer below the saturated zone.
3) Purged groundwater samples will be collected.
4) Analyses for fuel oxygenates will be performed on groundwater samples from source locations, BH-11, BH-12, and BH-13.
5) All groundwater monitoring wells will be analyzed at least once for fuel oxygenates but if detected, it shall be included in future monitoring events.
6) The lead scavengers, Ethylene Dibromide (EDB) and Ethylene Dichloride (EDC) will be included in groundwater analyses for monitoring wells, MW-1, 5, and 6.
7) Depth discrete groundwater samples will be collected from at least one of the source locations.

TECHNICAL REPORT REQUEST

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

June 30, 2004 - Soil and Water Investigation Report
July 31, 2004 - Second Quarter 2004 Groundwater Monitoring Report
October 31, 2004 - Third Quarter 2004 Groundwater Monitoring Report
January 31, 2005 - Fourth Quarter 2004 Groundwater Monitoring Report
April 30, 2005 – First Quarter 2005 Groundwater Monitoring Report

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Bruce Rucker, Stellar Environmental Solutions, 2198-6th St., Suite 201, Berkeley, CA 94710
Donna Drogos
File

ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
DAVID J. KEARS, Agency Director

12-3-03

ENVIRONMENTAL HEALTH SERVICES
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1131 Harbor Bay Parkway, Suite 250
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(510) 567-6700
FAX (510) 337-9335

December 3, 2003

Glen Poy-Wing
Oakland Auto Works
240 W. MacArthur Blvd.
Oakland, CA 94611

Dear Mr. Poy-Wing:

Subject: Fuel Leak Case No. RO0000142, Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611

Alameda County Environmental Health (ACEH) staff has reviewed "Workplan for Additional Site Characterization" dated August 20, 2003 by Stellar Environmental Solutions. The Workplan is not approved. We request that you address the remaining technical comments, and send us the technical reports requested below.

TECHNICAL COMMENTS

1) Site Characterization – The Workplan proposes boreholes to define the groundwater contaminant plume. We do not agree with the three proposed boring locations east of the property because the groundwater flow has been indicated west and north. Instead, we believe that to define the plume, additional boreholes ought to be located west of the former fuel tanks and boreholes BH-6 and BH-4, and north of the former fuel tanks and MW-1 and MW-5 on the site side of Howe St. Please propose additional sampling locations to define the plume associated with your site in the amended work plan requested below.

2) Borehole Samples and Depths – a) The proposed number of borehole soil samples are inadequate. Instead, we please collect soil samples at a minimum of 5-foot intervals, changes in lithology, the soil/groundwater interface, and areas of obvious contamination. b) The proposed borehole depths are inadequate for vertical delineation. Several of the well logs indicated gasoline odors at 20 ft.

   Please propose procedures for sample collection and borehole depths in the amended work plan requested below.

3) Preferential Pathway Survey – a) Utility Survey - Please submit map(s) and cross-sections showing the location and depth of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s). Evaluate the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers. Report your findings in the Soil and Water Investigation Report (SWI) Report requested below. b) Well Survey – The Workplan proposes to only include water supply wells. Water wells are to be included. Locate water wells within a quarter mile radius of the site. Show the location of the wells and the site on a map. List well construction details for each well. Please submit in the Soil and Water Investigation Report.

4) Geologic cross-sections – A-A' and B-B' were provided. Please show their locations on the site plan. In your cross-sections, please also include soil and groundwater analytical results, and utility conduits. Please use cross-sections to propose additional boreholes, evaluate the probability of the contaminant plumes encountering preferential pathways and the occurrence and distribution of MTBE at your site in the Soil and Water Investigation Report.

5) Methyl Tertiary-Butyl Ether (MTBE) – Include extended geologic cross-sections, which incorporate data (analytical results, utility conduits, well screens, etc.) from adjacent sites to use to evaluate the occurrence and distribution of MTBE at your site in the Soil and Water Investigation Report.

6) Professional seal - All technical reports must contain a statement of professional certification with the appropriate professional signatures and seals.

TECHNICAL REPORT REQUEST

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

January 31, 2004 – Amended Work Plan
January 31, 2004 - Fourth Quarter 2003 Groundwater Monitoring Report
60 days after Work Plan approval - Soil and Water Investigation Report
April 30, 2004 – First Quarter 2004 Groundwater Monitoring Report
July 31, 2004 - Second Quarter 2004 Groundwater Monitoring Report
October 31, 2004 - Third Quarter 2004 Groundwater Monitoring Report

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Bruce Rucker, Stellar Environmental Solutions, 2198-6th St., Suite 201, Berkeley, CA 94710
Donna Drogos
File

ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
DAVID J. KEARS, Agency Director

04-17-03

ENVIRONMENTAL HEALTH SERVICES
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April 16, 2003

Warren Dodson
Dodson Ltd.
PO Box 69807
Los Angeles, CA 90067-0809

Dear Mr. Dodson:

Subject: Fuel Leak Case No. RO0000142, Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611

Alameda County Environmental Health (ACEH) staff has reviewed "4th Quarter Groundwater Sampling Report" dated November 11, 2002 and "1st Quarter Groundwater Sampling Report" dated March 7, 2003 prepared by Advanced Environmental Concepts, Inc. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1) Site Characterization – Up to 976,000 microgram/liter (ug/l) Total Petroleum Hydrocarbons-gasoline (TPH-g), 5,200 ug/l Benzene, and 4,200 ug/l Methyl Tertiary-Butyl Ether (MTBE) have been detected in monitoring wells at the property boundaries of your site. Thus, the lateral and vertical extent of your dissolved contaminant plumes is undefined. Please propose additional sampling locations to define the plumes associated with your site in the work plan requested below. Include geologic cross-sections and show soil and groundwater analytical results, utility conduits, well screens, etc., and explain your rationale for additional sampling locations. You may want to consider performing an investigation to quickly define the location of the contaminant plume downgradient from the release site prior to installing the permanent monitoring network. That will allow you to optimize the location and depth of the permanent wells, thereby reducing the cost of the monitoring work. Collection of groundwater samples using a one-time direct push water sampling tool would be appropriate for this investigation.

2) Source Characterization – Up to 11,700 milligram/kilogram (mg/kg) TPH-G and 25.6 mg/kg Benzene have been detected in soil at the northeast corner of your site. Thus, the lateral and vertical extent of soil contamination is undefined. Please include your proposal for soil contamination is definition in the work plan requested below. Include geologic cross-sections and show soil and groundwater analytical results, utility conduits, well screens, etc., and explain your rationale for additional sampling locations.

3) Preferential Pathway Survey – We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site. The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of the plume encountering preferential pathways and conduits that could spread contamination.
   a) Utility Survey - Please submit map(s) and cross-sections showing the location and depth of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s). Evaluate the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers. Report your findings in the Soil and Water Investigation Report (SWI) Report requested below.
   b) Well Survey – Locate wells within a quarter mile radius of the site. Show the location of the wells and the site on a map. List well construction details for each well. Please submit.

4) Groundwater Sampling for Total Petroleum Hydrocarbons-Diesel (TPH-D) – Borings BH-6 found 450,000 microgram/liter (ug/l) TPH-D on January 10, 1997. Groundwater sampling of the existing monitoring wells for TPH-D was only performed on August 8, 1997. MW-1, MW-2, MW-3, and MW-4, were all nondetectable (ND) for TPH-D. MW-1, MW-2, and MW-3, are all downgradient of and within 10 feet of either the former tank or dispenser locations. Please sample MW-1, MW-2, MW-3, MW-5, MW-6, and MW-8 for TPH-D. If TPH-D is detected in any well, it is to be incorporated into your regular monitoring plan.

5) Methyl Tertiary-Butyl Ether (MTBE) – Up to 4,200 ug/l MTBE has been detected onsite. The removal of a waste oil tank on October 3, 1996 has been documented. The background history of the site showed that the gasoline tanks were from Gulf Oil which was prior to the use of MTBE. None of the soil samples collected onsite found MTBE concentrations above the detection limits. Adjacent and upgradient of the site is Shell Service Station, 230 W. MacArthur Blvd., where up to 3,200 ug/l MTBE was found. However, MW-4 which is within 15 feet of the property line and is located on the Vogue Tyres side, has never found MTBE above the detection limits. We request that you develop extended geologic cross-sections which incorporate data (analytical results, utility conduits, well screens, etc.) from adjacent sites to use to propose work to evaluate the occurance and distribution of MTBE at your site.

6) Historical Groundwater Depths - Please add a column for groundwater depths to the Table of Analytical Results.

7) "Recommendation (3)" – Our review of boring logs did not find the confining clay layers described by your consultant. Please use the geologic cross sections requested above to clarify their assessment.

8) Historical Hydraulic Gradient – Please provide rose diagrams, which include cumulative groundwater gradients in all future reports submitted for this site.

9) Analyses for lead scavengers Ethylene Dibromide (EDB) and Ethylene Dichloride (EDC) were previously requested but omitted. Please include in the next round of groundwater monitoring. If any of the compounds are detected, and are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan. Also, please analyze for these compounds in source area soil. Please propose additional sampling locations to define the plumes associated with your site in the work plan requested below.

TECHNICAL REPORT REQUEST

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

- June 3, 2003 - Work Plan
- July 31, 2003 - Quarterly Report for the Second Quarter 2003
- October 31, 2003 - Quarterly Report for the Third Quarter 2003
- January 31, 2004 - Quarterly Report for the Fourth Quarter 2003

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Jonathan Buck, Advanced Environmental Concepts, Inc., 4400 Ashe Rd. #206, Bakersfield, CA 93313
Donna Drogos
File

ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
DAVID J. KEARS, Agency Director

04-02-02

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

April 1, 2002

Warren Dodson
Dodson Ltd.
PO Box 69807
Los Angeles, CA 90067-0809

Dear Mr. Dodson:

Subject: Fuel Leak Case No. RO0000142, Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611

Alameda County Environmental Health (ACEH) staff has reviewed "December 2001 Quarterly Groundwater Sampling" dated January 30, 2002, "October 2001 Quarterly Groundwater Sampling and Summary 'Hi-Vac' Report" dated December 15, 2001, and "July 2001 Quarterly Groundwater Sampling Report," dated August 31, 2001, all prepared by Advanced Environmental Concepts, Inc. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. Groundwater Monitoring - After the use of 'Hi-Vac', groundwater contaminant concentrations generally decreased significantly. For a few contaminants, the concentrations increased. Monitoring wells MW-1, MW-2, MW-3, and MW-5, were subjected to vacuum extraction. Maximum Total Petroleum Hydrocarbons-Gasoline (TPH-G), Benzene, and Methyl Tertiary-Butyl Ether (MTBE) concentrations found on December 19, 2001 were 5,800 ug/l, 620 ug/l, and 370 ug/l, respectively. We request that you monitor the groundwater contaminant plumes on a quarterly basis to evaluate plume stability. Discuss the results of your plume monitoring in the Quarterly Reports requested below. We request that Quarterly Reports contain all of the following: a discussion of the results of your plume monitoring, an evaluation of the stability of your plume and recommendations for the installation of additional wells if your evaluation indicates your plume is migrating, and a description of any additional work that may be needed.

TECHNICAL REPORT REQUEST

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

- **April 15, 2002** - Quarterly Report for the First Quarter 2002
- **July 15, 2002** - Quarterly Report for the Second Quarter 2002
- **October 15, 2002** - Quarterly Report for the Third Quarter 2002
- **January 15, 2003** - Quarterly Report for the Fourth Quarter 2002

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Jonathan Buck, Advanced Environmental Concepts, Inc., 4400 Ashe Rd. #206, Bakersfield, CA 93313

File

ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
DAVID J. KEARS, Agency Director

10-12-01

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

October 11, 2001

Warren Dodson
Dodson Ltd.
1323 S. Flower St.
Los Angeles, CA 90015

Dear Mr. Dodson:

Subject: Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611
RO0000142

"Summary 'Hi-Vac' Workplan" dated September 11, 2001 and "Using 'Hi-Vac' Technique" dated October 11, 2001, prepared by Advanced Environmental Concepts, Inc., were reviewed. The technique proposed may be implemented contingent upon approval by the Bay Area Air Quality Management District.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist

C: Jonathan Buck, Advanced Environmental Concepts, Inc., 4400 Ashe Rd. #206, Bakersfield, CA 93313

File

07-27-01

ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
DAVID J. KEARS, Agency Director

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

July 26, 2001

Warren Dodson
Dodson Ltd.
1323 S. Flower St.
Los Angeles, CA 90015

Dear Mr. Dodson:

Subject: Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611
RO0000142

"May 2001 Quarterly Groundwater Sampling Report" dated May 27, 2001 was reviewed. Groundwater samples were collected from monitoring wells MW-1, MW-2, MW-3, MW-4, MW-5, MW-6, MW-7, and MW-8, on May 11, 2001. MW-1 and MW-5 again had the highest constituent concentrations except for methyl tertiary-butyl ether (MTBE), consistent with historical results. MW-1 and MW-5 are within 20 feet of each other. MW-1's concentrations were 20,000 ug/l Total Petroleum Hydrocarbons-Gasoline (TPH-G), 2,900 ug/l benzene, 310 ug/l toluene, 1,900 ug/l xylene, 230 ug/l ethylbenzene (BTXE), and <30 ug/l MTBE. MW-5's concentrations were 22,000 ug/l TPH-G, 2,600 ug/l, 480 ug/l, 2,700 ug/l, 220 ug/l BTXE, and <30 ug/l MTBE. MW-2 had the lowest concentrations for TPH-G and MTBE yet found in that well, 720 ug/l and 380 ug/l, respectively. BTXE were within historical ranges. MW-3's concentrations were within historical ranges, 1,900 ug/l TPH-G, 180 ug/l, 12 ug/l, 19 ug/l, <3 ug/l BTXE, and <30 ug/l MTBE. MW-4's concentrations were nondetectable (ND) or nearly ND. Previous concentrations have been ND for all constituents. MW-6's concentration of TPH-G of 610 ug/l was a decrease from the prior quarter. BTXE and MTBE concentrations were consistent with those of the prior quarter. The concentrations were 15 ug/l, 0.97 ug/l, 46 ug/l, <0.5 ug/l, and <0.5 ug/l, respectively. MW-7 and MW-8's concentrations were all ND or nearly ND. Notable changes were decreases of MTBE for MW-7 and MW-8 to 1.1 ug/l and 4.4 ug/l from the prior quarter's 284 ug/l and 620 ug/l, and MW-8's decrease of TPH-G to <50 ug/l from the prior quarter's 1,000 ug/l.

We concur with the recommendation to continue quarterly groundwater sampling. Also, Advanced Environmental Concepts, Inc. (AEC) does not believe that the contamination will mitigate through natural attenuation. Thus, AEC recommends using a vacuum truck to remove the contaminated groundwater from MW-1 and MW-5, and concurrently perform vapor extraction. Submit a remediation workplan for our review.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist

C: Jonathan Buck, Advanced Environmental Concepts, Inc., 4400 Ashe Rd. #206, Bakersfield, CA 93313

File

ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
DAVID J. KEARS, Agency Director

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

May 2, 2001

Warren Dodson
Dodson Ltd.
1323 S. Flower St.
Los Angeles, CA 90015

Dear Mr. Dodson:

Subject: Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611
RO0000142

"December 2000 Quarterly Groundwater Sampling Report" dated February 7, 2001 and "Additional Soil and Groundwater Assessment" dated March 2001 by Advanced Environmental Concepts, were reviewed. Groundwater samples were collected from monitoring wells MW-1, MW-2, MW-3, and MW-4 on December 15, 2000. The constituent concentrations reported for MW-1 were 976,000 ug/l Total Petroleum Hydrocarbons-Gasoline (TPH-G), 2,490 ug/l benzene, 1,420 ug/l toluene, 10,100 ug/l xylene, 3,640 ug/l ethylbenzene, and <150 ug/l Methyl Tertiary-Butyl Ether (MTBE). The 976,000 ug/l TPH-G reported is questionable since this concentration would exceed its saturation level. The constituent concentrations for MW-2 were 3,020 ug/l TPH-G, 56.7 ug/l benzene, <1.5 ug/l toluene, <1.5 ug/l xylene, <3.0 ug/l ethylbenzene, and 3,040 ug/l MTBE. The constituent concentrations for MW-3 were 5,450 ug/l TPH-G, 445 ug/l benzene, <7.5 ug/l toluene, <7.5 ug/l xylene, 23.8 ug/l ethylbenzene, and 603 ug/l MTBE. MW-4 continued to indicate no detectable concentrations of any of the constituents analyzed.

Four groundwater monitoring wells, MW-5, MW-6, MW-7, and MW-8, were installed on February 13, 2001. The soil sample from MW-5 @ 15' had 11,700 ppm TPH-G at 15 feet below ground surface (bgs). The elevated TPH-G concentration may be attributable to the soil sample being from the capillary fringe since the depth to groundwater was at 16.36 feet. Soil samples from MW-6, MW-7, and MW-8, were below detection limits for all constituents with the exception that a sample from MW-8 had a small amount of MTBE. MW-5, MW-6, and MW-8, exhibited elevated TPH-G concentrations, 5,660 ug/l, 1,340 ug/l, and 1,000 ug/l, respectively. MW-7, which is downgradient and offsite, was nondetectable for all constituents with the exception of MTBE, which was 284 ug/l.

07-27-01

ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
DAVID J. KEARS, Agency Director

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

May 2, 2001

Warren Dodson
Dodson Ltd.
1323 S. Flower St.
Los Angeles, CA 90015

Dear Mr. Dodson:

Subject: Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611
RO0000142

"December 2000 Quarterly Groundwater Sampling Report" dated February 7, 2001 and "Additional Soil and Groundwater Assessment" dated March 2001 by Advanced Environmental Concepts, were reviewed. Groundwater samples were collected from monitoring wells MW-1, MW-2, MW-3, and MW-4 on December 15, 2000. The constituent concentrations reported for MW-1 were 976,000 ug/l Total Petroleum Hydrocarbons-Gasoline (TPH-G), 2,490 ug/l benzene, 1,420 ug/l toluene, 10,100 ug/l xylene, 3,640 ug/l ethylbenzene, and <150 ug/l Methyl Tertiary-Butyl Ether (MTBE). The 976,000 ug/l TPH-G reported is questionable since this concentration would exceed its saturation level. The constituent concentrations for MW-2 were 3,020 ug/l TPH-G, 56.7 ug/l benzene, <1.5 ug/l toluene, <1.5 ug/l xylene, <3.0 ug/l ethylbenzene, and 3,040 ug/l MTBE. The constituent concentrations for MW-3 were 5,450 ug/l TPH-G, 445 ug/l benzene, <7.5 ug/l toluene, <7.5 ug/l xylene, 23.8 ug/l ethylbenzene, and 603 ug/l MTBE. MW-4 continued to indicate no detectable concentrations of any of the constituents analyzed.

Four groundwater monitoring wells, MW-5, MW-6, MW-7, and MW-8, were installed on February 13, 2001. The soil sample from MW-5 @ 15' had 11,700 ppm TPH-G at 15 feet below ground surface (bgs). The elevated TPH-G concentration may be attributable to the soil sample being from the capillary fringe since the depth to groundwater was at 16.36 feet. Soil samples from MW-6, MW-7, and MW-8, were below detection limits for all constituents with the exception that a sample from MW-8 had a small amount of MTBE. MW-5, MW-6, and MW-8, exhibited elevated TPH-G concentrations, 5,660 ug/l, 1,340 ug/l, and 1,000 ug/l, respectively. MW-7, which is downgradient and offsite, was nondetectable for all constituents with the exception of MTBE, which was 284 ug/l.

7/26/01
please replace page 1
MW-2 concentrations
for toluene, xylene,
ethylbenzene + MTBE
were in ug/l

We concur with the recommendation to continue quarterly groundwater sampling. We will be awaiting the results of the next round of groundwater sampling and recommendations based on the results. If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist

C: Jonathan Buck, Advanced Environmental Concepts, Inc., 4400 Ashe Rd. #206, Bakersfield, CA 93313

File

12-18-00

ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
DAVID J. KEARS, Agency Director

R0142

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

December 15, 2000

Warren Dodson
Dodson Ltd.
1323 S. Flower St.
Los Angeles, CA 90015

Dear Mr. Dodson:

Subject: Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611
StId 6059

"Additional Groundwater Assessment Workplan" dated October 2000 from your consultant, Jonathan Buck of Advanced Environmental Concepts, was reviewed. It is approved.

Please have your consultant notify me of their schedule for the work at the site ahead of time so that I may have the option to be present. If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist

ec

C: Jonathan Buck, Advanced Environmental Concepts, Inc., 4400 Ashe Rd. #206, Bakersfield, CA 93313

File

SENT 5-16-2000
NEED DCLS

ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
DAVID J. KEARS, Agency Director

RO142

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

May 16, 2000

Warren Dodson
Dodson Ltd.
1323 S. Flower St.
Los Angeles, CA 90015

Dear Mr. Dodson:

Subject: Vogue Tyres, 240 W. MacArthur Blvd., Oakland, CA 94611
StId 6059

The letter dated December 3, 1999 from your consultant, Jonathan Buck of Advanced Environmental Concepts was reviewed. We disagree with the recommendation for closure for this site for the following reasons:

1) Contrary to Mr. Buck's statement that "Quarterly sampling has shown that the contaminants are generally degrading passively...", groundwater contamination doesn't appear to be attenuating. Instead, Total Petroleum Hydrocarbons as Gasoline (TPH-G) has increased in MW3 from the last sampling on January 19, 1999, compared to the previous quarter, October 19, 1998. Benzene has increased from the last sampling on January 19, 1999, compared to the previous quarter, October 19, 1998 in MW1, MW2, and MW3. Methyl Tertiary-Butyl Ether (MTBE) has increased in MW1 and MW3 with MTBE as high as 2,100 ug/l, and MTBE is not decreasing in MW2. He attributes the spikes of elevated concentrations to seasonal precipitation changes. This trend is not readily apparent when groundwater contaminant concentrations are compared to sample dates.
Therefore, quarterly groundwater monitoring needs to be continued until the plume has stabilized as indicated by decreases or no change in the concentrations of contaminants. Although passive bioremediation is the usual remedial alternative, more aggressive active remediation may be proposed.

2) Additionally, the increasing contaminant concentrations may indicate that the contaminant plume may have migrated off site. Therefore, further delineation and characterization of the plume is required. A perched lens consisting of a less permeable clayey silt and a water-bearing zone that was 3 feet thick was not apparent from a review of the boring logs. Even if these statements were true, only the vertical extent of contamination would be limited but not the horizontal extent. Also, in order for the water source to be of insufficient volume for municipal or domestic use, Regional Board Resolution No. 89-39,"Sources of Drinking Water" states that it must not be capable of supplying a single well with an average sustained yield of 200 gallons per day.

3) Concentrations of Methyl Tertiary-Butyl Ether (MTBE) in groundwater beneath the site were as high as 2,100 ug/l. The Regional Water Quality Control Board is currently not closing any sites with MTBE concentrations exceeding 200 ug/l.

4) The benzene concentration of 1,200 ppb found in the most recent groundwater monitoring sample collected on January 19, 1999 exceeded the human health protective threshold value of 214 ppb for a 1/100,000 risk at a commercial site, per the Tier 1 Table of the American Society for Testing and Materials' Risk Based Corrective Action Guidelines (ASTM RBCA E 1739-95). Unless it can be shown that the groundwater-vapor intrusion from groundwater to buildings and the groundwater volatilization to outdoor air exposure pathways are limited, the benzene concentrations must be evaluated.

5) The next round of groundwater monitoring needs to include analyses for additional oxygenates and additives, specifically, ether oxygenates: Tertiary Amyl Methyl Ether (TAME), Diisopropyl Ether (DIPE), Ethyl Tertiary Butyl Ether (ETBE); Tertiary Butyl Alcohol (TBA); lead scavengers: Ethylene Dibromide (EDB), Ethylene Dichloride (EDC) [(1,2-Dichloroethane) (1,2-DCA)]. Future analyses need not include any of these constituents not found in the next round of groundwater monitoring.

6) The presence or absence of horizontal and vertical conduits which could act as preferential pathways for the dissolved plume needs to be evaluated.

7)Lastly, "Phase 2 Subsurface Investigation Report" dated February 14, 1997 by All Environmental, Inc., tabulated Polynuclear Aromatic Hydrocarbons (PNA's) concentrations in soil sampled January 1997, for all six borings in Table 1, on page 3. These concentrations for PNA's in soil were as high as 41 mg/kg. However, the "Chain of Custody Record" showed that PNA analyses were only requested for BH2,L3-15'; BH3,L3-15'; and BH2W. These concentrations for PNA's were all NonDetectable (ND). Hence, the PNA concentrations in the report differed from those reported by the laboratory. Explain the discrepancy.

Provide a workplan to address the items listed. If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist

C: Jonathan Buck, Advanced Environmental Concepts, Inc., 4400 Ashe Rd. #206, Bakersfield, CA 93313

Sent 11-1-99
including COC's

ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
DAVID J. KEARS, Agency Director

RO142

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

October 27, 1999

Mr. Warren Dodson
Dodson Ltd.
1323 South Flower Street
Los Angeles, CA 90015

STID: 6059
Re: Investigations at 240 West MacArthur Blvd., Oakland, CA 94611

Dear Mr. Dodson,

I, Juliet Shin, have been designated as the new caseworker for the above site. Based on my review of the case files, it was determined that additional investigations will be required at the site.

In February 1991, a magnetometer survey, conducted by Mittelhauser Corporation, identified a large magnetic anomaly in the northwestern portion of the above site and a 350-gallon waste oil underground storage tank (UST) at the southern end of the site. The waste oil UST was subsequently removed from the site in October 1996. Two soil samples collected from the bottom of the tank pit at 7- and 8-feet below ground surface (bgs) were analyzed for Total Petroleum Hydrocarbons as diesel (TPHd), Total Oil & Grease (TOG), Methyl Tertiary Butyl Ether (MTBE), total lead, Semi-Volatile Organic Compounds (SVOCs), and benzene, toluene, ethylbenzene, and total xylenes (BTEX). Analysis of these two samples identified up to 510 parts per million (ppm) TPHd and 7,000ppm TOG. Consequently, the tank pit was overexcavated down to 9-feet bgs, and five additional soil samples were collected from the excavation (SW1 through SW4 were collected from the four sidewalls of the excavation at 8.5-feet bgs; and one soil sample, EB, was collected from the bottom of the excavation at 9-feet bgs.) These soil samples were analyzed for the same constituents as above, with the addition of TPH as gasoline (TPHg). Analysis of these samples only identified low levels of TPHd and metals below threshold values.

In January 1997, six borings (BH-1 through BH-6) were advanced at the site to assess both soil and groundwater contamination at the site. One soil sample was collected from each of the borings at 15-feet bgs, and analyzed for the same constituents as above. Soil samples collected from the borings placed around the large magnetic anomaly in the northwestern corner of the site (BH-4 through BH-6) were the only borings to identify TPHg, TPHd, and BTEX contamination. Additionally, according to the February 14, 1997 Subsurface Investigation report, SVOCs were also identified in all of the six soil samples. "Grab" groundwater samples were collected from borings BH-1, BH-2, BH-4, and BH-6. The groundwater samples collected from borings BH-1, BH-4, and BH-6 identified elevated levels of TPHg, TPHd, MTBE, and benzene. The highest concentrations were noted in boring BH-6, located adjacent to the magnetic anomaly and the former Gulf Service Station gasoline UST locations at the northern end of the site.

In August 1997, three additional borings (BH-7 through BH-9) and four groundwater monitoring wells (MW-1 through MW-4) were drilled at the site to further delineate the observed soil and groundwater contamination. Well MW-4 was placed as the upgradient well to determine whether there was any contamination coming from the Shell Service Station, located south of the site. Two soil samples were collected from each of the three borings and four monitoring wells and analyzed for TPHg, TPHd, and BTEX. Only low levels of TPHg and BTEX were identified in these soil samples. Analysis of the groundwater samples collected from the four monitoring wells identified elevated levels of TPHg and BTEX in Wells MW-1 through MW-3, located in the vicinity of the former Gulf Service Station gasoline USTs.

To date, the monitoring wells have been monitored in 08/97; 12/97; 3/98; 07/98; 10/98; and 01/99. Contaminant concentrations in these wells do not appear to be significantly attenuating, and rather, levels of TPHg and benzene appear to be increasing in Well MW-1, and levels of MTBE appear to be increasing in Wells MW-2 and MW-3. Concentrations of MTBE in groundwater beneath the site are currently as high as 2,100 parts per billion (ppb). The San Francisco Bay-Regional Water Quality Control Board (RWQCB) is currently not closing any sites with MTBE levels exceeding 200ppb. The benzene level most recently identified in Well MW-1 is currently exceeding the human-health protective threshold value of 740ppb for a $10^{-5}$ risk at a commercial site, per the Tier 1 Table of the American Society for Testing and Materials' Risk Based Corrective Action Guidelines (ASTM RBCA E 1739-95).

The identified soil and groundwater contamination appears to be resulting from your site, and unless it can be proven otherwise, you will be required to continue quarterly groundwater monitoring at the site. The next round of groundwater monitoring should be conducted within 45 days of the date of this letter, and must include the analysis for the following fuel oxygenates and lead scavengers using Methods 8260 and 8010: **Tertiary Amyl Methyl Ether (TAME), Diisopropyl Ether (DIPE), Ethyl Tertiary Butyl Ether (ETBE), Tertiary Butyl Alcohol (TBA), Ethylene Dibromide (EDB), and Ethylene Dichloride (EDC).** If these constituents are not identified in the next sampling event, further analysis for these constituents will not be necessary.

Additionally, based on the fact that the contaminant concentrations are increasing in the downgradient wells at the site, it appears that the contaminant plume may have migrated off site. Therefore, this office is requiring further delineation and characterization of the plume. **A workplan addressing further delineation of the contaminant plume should be submitted within 45 days of the date of this letter (i.e., by December 08, 1999).** Any requests for extensions of the due date, or modifications of the required work, should be submitted in writing.

Lastly, per Table 1 in the February 14, 1997 Phase II Subsurface Investigation Report, $VOCs (a.k.a. PNAs) were identified in the soil samples collected from borings BH-1 through BH-6, however, the laboratory analyticals attached to the report did not indicate that any PNAs were identified. Was this a typo? If PNAs were, in fact, identified in the soil samples, future groundwater analysis should include PNAs.

The State Water Resources Control Board manages an Underground Storage Tank Cleanup Fund (Fund) to help eligible Responsible Parties to obtain reimbursement for costs of investigating and remediating releases from petroleum underground storage tanks. You are encouraged to apply. To obtain an Application Package, contact the Fund at the following:

State Water Resources Control Board
Division of Clean Water Programs
UST Cleanup Fund
P.O. Box 944212
Sacramento, CA 944212
Telephone: (916) 227-4366

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

Sincerely,

Juliet Shin, R.G.
Hazardous Materials Specialist

Cc: Jon Buck
Advanced Environmental Concepts, Inc.
4400 Ashe Road, #206
Bakersfield, CA 93313

Lou Vaught
50 California Street, Ste. 3240
San Francisco, CA 94111

Leroy Griffin
City of Oakland Fire Dept., OES
1605 Martin Luther King Jr. Way
Oakland, CA 94612-1393

ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
DAVID J. KEARS, Agency Director

RO#142

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

November 27, 1998

Mr. Warren Dodson
Dodson. Ltd.
1323 South Flower Street
Los Angeles, California 90015

Ref: 240 West MacArthur Boulevard, Oakland, CA

Dear Mr. Dodson:

I am in receipt of the third quarterly groundwater sampling results, dated June 29, 1998 prepared by Advanced Environmental Concepts for the above referenced site. In response to a request for closure, this Department has reviewed all pertinent files. Based on the presence of benzene identified in significant concentrations in monitoring well, MW-2, this Department requires that an additional round of groundwater monitoring be conducted during the next two months (rainy season). This is required in order to complete the annual cycle ( four quarters) which would take into account any seasonal fluctuations that may affect the concentration of petroleum hydrocarbons observed in the wells.

Subsequent to receiving the fourth quarter monitoring results, this Department would re-evaluate the site for closure. The site will be evaluated on pertinent factors, which may include the comparison of site concentrations to ASTM RBCA's (Risk Based Corrective Action Methodology) tier 1 levels. Based on the results of this evaluation, this Department may recommend that a site specific risk assessment be conducted for the referenced property. If you have any questions, you may reach me at (510) 567-6764

Sincerely,

Madhulla Logan

Madhulla Logan
Hazardous Material Specialist

C: Debbie Irwin, AEC, 4400 Ashe Road #206, Bakersfield, CA 93313

ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
DAVID J. KEARS, Agency Director

RO#142

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

May 5, 1997

**Mr. Warren Dodson**
**Dodson, Limited**
**1323 South Flower Street**
**Los Angeles, CA 90015**

**Re: 240 West MacArthur Blvd, Oakland, CA**

Dear Mr. Dodson:

I am in receipt of the document "Soil and Groundwater Investigation Work plan", dated April 15, 1997, prepared by All Environmental, Inc. for the above referenced site.

This work plan has been reviewed by this Department and the proposed work is acceptable with the following modifications:

- Move the location of the proposed monitoring well in the northwest corner at least 10 feet to the right (towards east).
- At least two soil samples should be collected from each of the borings. Also, one of the soil samples should be collected just above the capillary zone.

Please submit a work plan to address the above listed requirements within 30 days from the date of this letter. If you have any questions, you can reach me at (510) 567-6764.

Sincerely,

Madhulla Logan

Madhulla Logan
Hazardous Material Specialist

C: **Jennifer Anderson, All Environmental, 3364 Mt. Diablo Blvd, Lafayetter, CA - 94549**

ALAMEDA COUNTY
**HEALTH CARE SERVICES**
AGENCY
DAVID J. KEARS, Agency Director

RO# 142

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

March 12, 1997
**STID 6059**
Mr. Warren Dodson
Dodson, Limited
1323 South Flower Street
Los Angeles, CA 90015

**Re: 240 West MacArthur Blvd, Oakland, CA**

Dear Mr. Dodson:

I am in receipt of the Phase II subsurface investigation report, dated February 14, 1997 prepared by All Environmental, Inc., for the above referenced site.

One waste oil sump was removed from site in March 1991 and the soil samples collected subsequent to sump removal indicated up to 2600 ppm of oil and grease. Confirmation soil samples collected subsequent to excavation indicated the presence of residual amount of oil and grease up to 360 ppm.

In October 1996, a 350 gallon waste oil underground storage tank was removed and soil samples collected from the tank excavation indicated the presence of petroleum hydrocarbons. However, confirmation soil samples collected at 8.5 to 9 ft bgs subsequent to over excavation did not indicate the presence of any contaminants above the detection limit.

Due to a magnetometer anomaly identified in February 1991, additional investigation was conducted in January 1997 around this area and around the former waste oil tank. Six borings were drilled and both soil and groundwater samples were collected and analyzed for gasoline, diesel, MTBE, BTEX, PNAs and oil and grease. Based on the laboratory results of the soil and groundwater samples significant amounts of petroleum hydrocarbons have been identified. Hence the following additional work is required to complete site characterization:

- At least one soil boring should be drilled in the area around BH-4 and BH-6 to define the extent of contamination in the soil.

- At least three monitoring wells should be installed down gradient and cross gradient to suspected UST (magnetometer anomaly) and former waste oil areas.

Please submit a work plan to this Department to address the above listed requirements within 30 days from the date of this letter. If you have any questions you may reach me at (510) 567-6764.

Sincerely,

Madhulla Logan

Madhulla Logan
Hazardous Material Specialist

**C: Jennifer Anderson, All Environmental, 3364 Mt. Diablo Blvd, Lafayetter, CA - 94549**