

DAVID J. KEARS, Agency Director

July 19, 2002

Mr. Al Avendano 3228 Hyde St. Oakland, CA 94601

Dear Mr. Avendano:

ENVIRONMENTAL HEALTH SERVICES

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

Subject: Fuel Leak Site No. RO0000319, 5115 E. 8th St., Oakland, CA 94601

Alameda County Environmental Health, Local Oversight Program (LOP), has received and reviewed the July 16, 2002 Subsurface Investigation Work Plan and the July 19, 2002 Subsurface Investigation Work Plan Addendum for the referenced site as prepared by RGA Environmental, Inc., (RGA). These work plans are designed to determine the limits of the petroleum release to soil and groundwater from the former gasoline and diesel tanks at this site. I have discussed the work plan and addendum with Mr. Paul King of RGA and our office concurs with the work plan addendum proposal and the groundwater sampling outlined in the original work plan.

The work plan, therefore, consists of advancing a total of six (6) boreholes per Figure 2 of the work plan addendum. In addition, the four existing on-site wells will be sampled at the same time. The six groundwater samples from the boreholes will be analyzed for TPH as gas, diesel and oil, BTEX and MTBE by EPA Method 8020. Where MTBE is detected in groundwater, this compound will be confirmed using EPA Method 8260. The four well samples will be analyzed for TPH as gas, diesel and oil, BTEX and MTBE. MW-1 and MW-3 will analyze BTEX and MTBE using EPA Method 8020, due to low levels of TPHg and past ND results for MTBE. MW-2 and OW1 will analyze for BTEX, MTBE, the other oxygenates and lead scavengers using EPA 8260 because of historical elevated TPHg concentrations in these wells. To delineate soil contamination, a soil sample from borings B1 through B3 will be analyzed for TPH as gas, diesel and oil, BTEX and MTBE by EPA 8020. Detected MTBE will be confirmed using EPA Method 8260.

Please notify our office prior to performing this work. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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C: B. Chan, files

Mr. Paul King, RGA, Inc., 4701 Doyle St., Suite 14, Emeryville, CA 94608

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DAVID J. KEARS, Agency Director

May 1, 2002 RO0000319

Mr. Al Avendano 3228 Hyde St. Oakland CA 94601 **ENVIRONMENTAL HEALTH SERVICES**

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

Re: Fuel Leak Case RO0000319, 5115 E. 8th St., Oakland CA 94601

Dear Mr. Avendano:

Alameda County Environmental Health has recently reviewed the case file for the subject site in response to your consultant's request for site closure as stated in EBA Engineering's March 2002 Quarterly Monitoring and Summary Report. Our office finds that the site is not at this time ready for closure. We request that you address the following technical comments prior to closure consideration.

Technical Comments:

This site must meet the requirements for a "low risk" groundwater case as outlined in the SFRWQCB January 5, 1996 Guidance document.

- The leak has been stopped and ongoing sources have been removed or remediated. Elevated petroleum hydrocarbons levels were found in the water sample from EBA-3. OW-1 installed near this location detected elevated diesel at 3' depth and has reported elevated gasoline and diesel in groundwater samples in the two monitoring events performed in 2/01 and 11/01. It appears that remediation is necessary in this source area.
- The site must be adequately characterized. Although the groundwater gradient has varied, both soil and groundwater samples remain elevated at the limits of investigation. In soil, the shallow sample from EBA-7 exhibited 2300 ppm gasoline. In groundwater elevated gasoline up to 3400 ppb, remains in MW-2.
- The plume is not migrating. The elevated levels of gasoline in MW-2, assumed to be down-gradient of the source indicate that the plume may be migrating.
- No water wells, drinking water aquifers, surface water or other sensitive receptors are likely to be impacted. A sensitive receptor survey should be performed.
- No risk to human health or the environment is expected. Human health has been addressed in your March 2002 report. Surface water impacts have not been examined as yet.
- For those sites, which meet these requirements, long term monitoring relying on natural bioremediation is recommended. Because the aforementioned items are not satisfactorily addressed,
 groundwater monitoring of all wells should continue on a quarterly basis, as soon as possible.
 Please include in addition to TPHg and TPHd, the analysis of MTBE, TAME, ETBE, DIPE, TBA,
 EDB and EDC by EPA 8260 on MW-2 and OW-1 on your next sampling.

Please submit a groundwater monitoring report and an appropriate work plan to address the above comments to our office within 30 days or no later than June 3, 2002.

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

May 1, 2002 RO0000319 5115 E. 8th St., Oakland 94601 Mr. Al Avendano Page 2

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

C: B. Chan, files

Mr. L. Winchell, P.O. Box 1166, Sacramento, CA 95691

Ms. E. Phenix, EBA Engineering, 825 Sonoma Ave., Suite C, Santa Rosa, CA 95404

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DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES

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

October 8, 2001 StID 3688/ RO0000319

Mr. Al Avendano 3228 Hyde St. Oakland CA 94601

Re: Status of Subsurface Investigation at 5115 E. 8th St., Oakland CA 94601

Dear Mr. Avendano:

This letter comments on the recently submitted, September 21, 2001 Quarterly Monitoring Report from EBA Wastechnologies (EBA) and responds to your request as to the status of the referenced site relative to receiving regulatory closure.

I have reviewed both the monitoring report and historical reports in regards to it meeting the requirements for site closure. The following comments are provided:

- Regarding the borings, EBA-1 through EBA-7, please provide copies of the boring logs for all borings since only that of EBA-1 has been provided.
- Please provide iso-concentration maps for contaminants in both soil and groundwater
- Please explain the expected groundwater gradient at this site. Should any wells be omitted when determining gradient? Are there subsurface conditions, which can explain the gradient?
- It appears that the greatest groundwater impact is near OW-1, therefore, this well should be included in the quarterly groundwater sampling and its results used in drawing your isoconcentration map.
- Please evaluate the residual soil and groundwater concentrations using both the City of Oakland and SFRWQCB RBSL guidelines. Please make recommendations for the site including remediation, investigation and/or conditional closure.

When these items are addressed, we can best respond to your question of site status and closure. Please contact me at (510) 567-6765 with questions.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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C: B. Chan, files

Mr. L. Winchell, P.O. Box 1166, Sacramento, CA 95691

Ms. C. Scheib, EBA Wastechnologies, 825 Sonoma Ave., Suite C, Santa Rosa, CA 95404

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DAVID J. KEARS, Agency Director

March 23, 2001 StID # 3688

Mr. Al Avendano 3228 Hyde St. Oakland CA 94601 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Re: Additional Groundwater Investigation Former Western Stucco Products, 5115 E. 8th St., Oakland CA 94601

Dear Mr. Avendano:

Our office has received and reviewed the March 2001 report referenced above as prepared by your consultant EBA Wastechnologies. As you are aware, this report summarizes the results of the February 2001 investigation where three monitoring and one observation/extraction well were installed at this site. The results of the soil and groundwater samples from these wells show less contamination than that reported in the 9/97 investigation. This may indicate that the extent of contamination is limited as a result of the fine-grained soils. In addition, grab groundwater sample results often are greater than water samples from developed wells. Although no evidence of free product was found in the samples from the observation well OW-1, it appears that this is the highest impacted area. Another interesting observation is the unexpected groundwater elevations found in the wells. The elevation in MW-1 shown in the February 28, 2001 Potentiometric map is significantly lower than the other three wells, therefore, a northwest gradient is observed.

Our office agrees with EBA's recommendation for continued quarterly groundwater monitoring. Because of the fine grained soils and the slow recharge observed in the wells, you should consider sampling the wells by the non-purge method, if applicable. Further monitoring will help determine if any additional investigation is necessary.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

Barney M Cha

C: B. Chan, files

Mr. L. Winchell, P.O. Box 1166, Sacramento, CA 95691

Ms. C. Scheib, EBA Wastechnologies, 825 Sonoma Ave., Suite C, Santa Rosa, CA 95404

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DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES

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

October 31, 2000 StID # 3688

Mr. Lewis Winchell Sacramento Stucco P.O. Box 1166 Sacramento, CA 95691

Re: Work Plan for Groundwater Investigation at 5115 E. 8th St., Oakland CA 94601

Dear Mr. Winchell:

Our office reviewed the October 13, 2000 EBA Wastechnologies Work Plan for Additional Groundwater Investigation for the above site. I have since discussed the work plan with Ms. Christine Scheib of EBA. Based on our discussion, she has faxed a brief work plan addendum incorporating agreed upon changes to the original work plan. As you may be aware, the revised work plan changes the location of the three monitoring wells, as well as adding an additional extraction/observation well in the vicinity of soil boring B-3. You will recall, free hydrocarbon product was observed in this boring. The extraction/observation well can be used for free product removal or treatment. As such, this well may be larger in diameter than the monitoring well and can be screened in a selective area of known contamination. The exact construction of the well is left to your consultant and should be based on field conditions. The well may not be suited for groundwater sampling or groundwater elevation measurements and will not be included in the "normal" quarterly sampling event.

Soil samples will be taken every five feet in the well borings and a minimum of one soil sample will be analyzed for TPH as diesel, TPH as gasoline, BTEX and MTBE. Should MTBE be detected by EPA Method 8020, please confirm the highest MTBE sample using EPA Method 8260 or an equivalent method.

This work plan is accepted and should be implemented as soon as possible. Please notify our office when this work is scheduled.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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C: B. Chan, files

Ms. C. Scheib, EBA Wastechnologies, 825 Sonoma Ave., Suite C, Santa Rosa CA 95404

Mr. A. Avendano, 3228 Hyde St., Oakland CA 94601

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HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director

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ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

September 13, 2000 StID # 3688

Mr. Lewis Winchell Sacramento Stucco Co. P.O. Box 1166 West Sacramento, CA 95691

FINAL NOTICE OF VIOLATION

Re: Request for Records Search and Work Plan for Additional Subsurface Investigation at Former Western Stucco, 5115 E. 8th St., Oakland CA 94601

Dear Mr. Winchell:

Our office would like to give you a final chance to come into environmental compliance in respect to your legal obligation to complete the underground tank investigation at the above referenced property.

For the sake of clarification, I have compiled the following brief history of events and correspondences with our office regarding this site:

- 1. Following EBA Wastechnologies (EBA) September 26, 1997 initial subsurface investigation at the site, my 12/31/97 letter commented on the EBA report and requested the submission of a work plan for additional subsurface investigation by 3/9/98.
- 2. After no reply, my 10/5/98 Notice of Violation was sent requesting the same technical report.
- 3. After no reply, my 2/26/99 Second Notice of Violation was sent requesting the same technical report.
- 4. EBA Wastechnologies sent a 5/19/99 letter work plan, which recommended that a limited records search be done prior to submitting the requested work plan. They had a concern that past activities, other than the operation of the underground tanks, may have contributed to the petroleum releases.
- 5. My 5/25/99 letter approved of the records search, however, it also stated that adequate site characterization is necessary before performing a risk-based corrective action (RBCA) evaluation. In addition, it requested that you submit the previously requested work plan within 30 days of completion of the records search.
- 6. My 9/28/99 letter requested that the records search and work plan be submitted by October 29, 1999.
- 7. After no reply, my 5/1/00 Notice of Violation requested the same technical reports, which leads to this final letter.

I have spoke with EBA Wastechnologies and have been informed that you have not authorized them to perform the requested records search or work plan. I have also spoke with prospective buyers of your property who have performed their own historical review of the site. They inform me that the site has always been a stucco facility.

Mr. Lewis Winchell StID # 3688 5115 E. 8th St., Oakland 94601 September 13, 2000 Page 2

At this time, you should submit the previously requested technical reports to our office within 30 days or no later than October 16, 2000. The failure to submit these reports will cause your site to be recommended to the Alameda County District Attorney's Office for enforcement. In addition, because of your non-compliance, you will be ineligible for financial reimbursement from the State Water Resource Control Board Cleanup Fund.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

C: B. Chan, files

Ms. Christine Scheib, EBA Wastechnologies, 825 Sonoma Ave., Suite C, Santa Rosa CA, 95404

Mr. Michael O'Connor, Alameda County District Attorney Office

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DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES

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

May 1, 2000 StID # 3688

Mr. Lewis Winchell Sacramento Stucco Co. P.O. Box 1166 West Sacramento, CA 95691

NOTICE OF VIOLATION

Re: Request for Records Search and Work Plan for Subsurface Investigation at Former Western Stucco, 5115 E. 8th St., Oakland CA 94601

Dear Mr. Winchell:

Please submit your records search and work plan reports for the above referenced site to our office within 30 days or no later than June 1, 2000. Our office has corresponded with you on several occasions (October 5, 1998 Notice of Violation, May 25, 1999 Letter Commenting on Limited Records Search Proposal and September 28, 1999 Request for Technical Reports). The last letter requested the referenced reports be submitted by October 29, 1999. To date, our office has not received any reports or communication from you.

You are reminded, this is a formal request for technical report pursuant to Title 23, Division 3, Chapter 16 of the California Code of Regulations. The failure to submit the requested reports may subject you to civil liability.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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C: B. Chan, files

Mr. M. Briggs, EBA Wastechnologies, 825 Sonoma Ave., Suite C, Santa Rosa, CA 95404 NOV5115E8

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DAVID J. KEARS, Agency Director



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

FAX (510) 337-9335

April 13, 2000 StID # 3688

Mr. Lewis Winchell Sacramento Stucco Co. P.O. Box 1166 Sacramento, CA 94691

NOTICE OF VIOLATION

Re: Request for Records Search and Work Plan for Subsurface Investigation at Former Western Stucco, 5115 E. 8th St., Oakland CA 94601

Dear Mr. Winchell:

Please submit your records search and work plan reports for the above referenced site to our office within 30 days or no later than May 15, 2000. Our office has corresponded with you on several occasions (October 5, 1998 Notice of Violation, May 25, 1999 Letter Commenting on Limited Records Search Proposal and September 28, 1999 Request for Technical Reports). The last letter requested the referenced reports be submitted by October 29, 1999. To date, our office has not received any reports or communication from you.

You are reminded, this is a formal request for technical report pursuant to Title 23, Division 3, Chapter 16 of the California Code of Regulations. The failure to submit the requested reports may subject you to civil liability.

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

Sincerely.

Barney M. Chan

Hazardous Materials Specialist

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Mr. M. Briggs, EBA Wastechnologies, 825 Sonoma Ave., Suite C, Santa Rosa, CA 95404 NOV5115E8

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DAVID J. KEARS, Agency Director



SENT 9-29-99 WINCHELL MBNSSS

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ENVIRONMENTAL HEALTH SERVICES

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

September 28, 1999 StID # 3688

Mr. Lewis Winchell Sacramento Stucco Co. P.O. Box 1166 Sacramento, CA 95691

Re: Request for Technical Reports for Former Western Stucco, 5115 E. 8th St., Oakland CA 94601

Dear Mr. Winchell:

In my past May 25, 1999 letter to you, I conditionally approved EBA Wastechnologies' proposal to perform a limited records search on the above referenced site. This additional information could determine if off-site sources are present and their potential impact to this site and if other historical activities on-site could have contributed to the release being found. Our office further requested that you submit a work plan to continue your on-site investigation within 30 days of completion of this record search.

At this time, we believe there has been more than adequate time to complete the records search and incorporate this information into a work plan. Therefore, please submit both technical reports ie record search and subsurface investigation work plan to our office within 30 days or no later than October 29, 1999.

This is a formal request for technical reports pursuant to Title 23, Division 3, Chapter 16 of the California Code of Regulations. The failure to submit the requested reports may subject you to civil liability.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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C: B. Chan, files

Mr. M. Briggs, EBA Wastechnologies, 825 Sonoma Ave., Suite C, Sauta Rosa, CA 95404 Regreps5115E8th

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DAVID J. KEARS, Agency Director

May 25, 1999 StID # 3688

Mr. Lewis Winchell Sacramento Stucco Co. P.O. Box 1166 Sacramento, CA 95691 ENVIRONMENTAL HEALTH SERVICES

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

Re: Letter Work Plan for Limited Records Search at Former Western Stucco 5115 E. 8th St., Oakland CA 94601

Dear Mr. Winchell:

Our office has received and reviewed the May 19, 1999 letter work plan prepared by EBA Wastechnologies proposing a limited records search. This search will include a review of current and past land use for properties in the vicinity of your site and a review of past releases to soil and groundwater at these sites. This investigation is approved, however, our office would like to clarify a few items regarding the use of this information.

The work plan states that the site may qualify for a risk based corrective action (RBCA) assessment. Please keep in mind that a RBCA is part of the evaluation of an underground storage tank leak site and whether it meets the closure criteria for a "low risk" soil or groundwater case as defined by the Water Board. However, before a RBCA can be performed, the site must be adequately characterized, the source and any free product must be removed or remediated, the plume must be stable and no sensitive receptors should be impacted. Therefore, it is not possible to perform a RBCA without the additional investigation previously proposed. It is, however, reasonable that the records search may lend information as to the potential location(s) of borings or monitoring wells. In addition, although there may be other sources of the petroleum contamination found onsite other than the former underground tanks, you remain a responsible party as the property owner. Evidence, in the form of off-site samples will be necessary to show the presence of an off-site source.

You may perform the limited records search, however, you should prepare and submit a subsurface investigation work plan using this information within 30 days of completion of the search.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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C: B. Chan, files

Mr. M. Briggs, EBA Wastechnologies, 825 Sonoma Ave., Suite C, Santa Rosa, CA 95404

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HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

February 26, 1999 StID # 3688

Mr. Lewis Winchell Sacramento Stucco Co. P.O. Box 1166 Sacramento, CA 95691

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

R0#319

SECOND NOTICE OF VIOLATION

Re: Request for Work Plan for Subsurface Investigation at Former Western Stucco Products, 5115 E. 8th St., Oakland CA 94601

Dear Mr. Winchell:

This letter is the second one to follow-up the subsurface investigation which occurred on September 26, 1997 by EBA Wastechnologies. The original work was required to determine the extent of the release from the former diesel and unleaded gasoline tanks removed from this site in 1981. The September 1997 investigation identified both soil and groundwater petroleum contamination and thus required further investigation to determine the limits and impact to groundwater. In addition, our office requested copies of all the boring logs from the seven borings advanced in September 1997 and a cross sectional map to estimate the subsurface stratigraphy.

My initial letter requested that an additional work plan be submitted by February 2, 1998 and later extended this deadline to March 2, 1998. Having not received the requested report I issued my Notice of Violation dated October 5, 1998, which again requested a work plan by November 6, 1998. To date, our office has still not received any reports, nor any request for an extension of the deadline.

Please submit an appropriate work plan to delineate the petroleum release and verify the impact to groundwater for the above site, within 30 days or by March 29, 1999.

This is a formal request for technical reports pursuant to the Health and Safety Code and the Water Code. The failure to submit the requested report will lead to the referral of this site to the District Attorney Office for enforcement. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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Ms. C. Scheib, EBA Wastechnologies, 825 Sonoma Ave., Suite C, Santa Rosa, CA 95404

Ms. J. Duerig, Alameda County District Attorney Office

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DAVID J. KEARS, Agency Director

R0#319

October 5, 1998 StID # 3688

Mr. Lewis Winchell Sacramento Stucco Co. P.O. Box 1166 Sacramento, CA 95691 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 Work Plan for Subsurface Investigation at Former Western Stucco Products, 5115 E. 8th St., Oakland CA 94601

Dear Mr. Winchell:

Our office last wrote to you in my December 31, 1997 letter. This letter commented on the December 1997 report by EBA Wastetechnologies (EBA). This report detailed the results of soil and groundwater samples taken from the advancement of seven (7) borings at this above referenced site. The results of this investigation indicated the limits of the groundwater contamination had not yet been defined, particularly in the northeast direction of the former underground tanks. Because of this, EBA recommended the installation of three to four monitoring wells. In my December 31, 1997 letter, I stated that this was one of the ways to complete this investigation. As an alternative, additional temporary monitoring wells could be installed and sampled to determine if permanent wells are necessary.

I requested that you send a work plan to complete the subsurface investigation to our office by February 2, 1998. I later extended this deadline to March 2, 1998. To date, our office has not received any reports or communication with you. Please submit an appropriate work plan to our office within 30 days or by November 6, 1998.

You should consider this a formal request for technical reports pursuant to the Water Code and the Health and Safety Code. The failure to submit the requested report may lead to civil liability.

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

Sincerely.

Barney M. Chan

Hazardous Materials Specialist

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C: B. Chan, files

Ms. C. Scheib, EBA Wastechnologies, 825 Sonoma Ave., Suite C, Santa Rosa, CA 95404 Nov5115



December 31, 1997 StID # 3688

Mr. Lewis Winchell Sacramento Stucco Co. P. O. Box 1166 Sacramento, CA 95691 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Re: Subsurface Investigation at Former Western Stucco Products, 5115 E. 8th St., Oakland CA 94601

Dear Mr. Winchell:

Our office has recieved and reviewed the December 1997 Subsurface Investigation report for the above referenced site as prepared by EBA Wastechnologies. This report details the results of the advancement of seven borings and the sampling of soil and groundwater from these borings. The work was done as a follow-up to the 1981 removal of two 8,000 gallon underground fuel tanks used to store diesel and unleaded gasoline. Initially, six borings were proposed, however, based upon field results one additional boring was advanced. Though both soil and groundwater samples were scheduled to be taken from each boring, groundwater was encountered and sampled only in three borings, EBA-1, EBA-3 and EBA-6.

Initial soil and groundwater results indicate the following:

- * Subsurface conditions are different enough to cause differences in the depth of first encountered groundwater.
- * Soil contamination appears to be limited in extent and mainly located to the northwest of the former diesel underground tank.
- * The extent of groundwater contamination cannot be determined with the information from this investigation. Free petroleum product may exist northwest of the former diesel tank. Please provide the logs for all borings. It may be helpful also to have your consultant prepare a cross-sectional map.

At this time, this site does not meet the criteria of a "low risk" groundwater case. Free product should be removed to the extent possible and the extent of groundwater contamination must be determined. This may be done in several ways. One way, as recommended by EBA Wastechnologies, is to install permanent monitoring wells. A second method would be to again advance temporary borings which can be converted into temporary wells.

Mr. Lewis Winchell 5115 E. 8th St., Oakland CA StID # 3688 December 31, 1997 Page 2.

The temporary wells could be developed and sampled and either closed or continue to be used based upon sampling results. Prior to closing the wells and site, a risk based evaluation of the residual soil and groundwater contamination should be performed.

Please provide the previously mentioned data and a work plan to complete your groundwater investigation within 30 days or by February 2, 1998.

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

Sincerely,

Barney M. Chan

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Hazardous Materials Specialist

c: B. Chan, files

Ms. C. Sceib, EBA Wastechnologies, 825 Sonoma Ave., Suite C, Santa Rosa, CA 95404

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DAVID J. KEARS, Agency Director

R0#319

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

September 30, 1997 StID # 3688

Mr. Lewis Winchell Sacramento Stucco Co. P. O. Box 1166 Sacramento, CA 95691

Re: Subsurface Investigation at Former Western Stucco Products, 5115 E. 8th St., Oakland CA 94601

Dear Mr. Winchell:

Our office has spoke with Mr. Pierre Lescure of EBA Wastechnologies regarding the recent soil and groundwater investigation at the above referenced site. Based upon initial sample results, EBA advanced one additional soil boring and was able to collect only three water samples. Therefore, the number of soil and groundwater samples collected differed from the initial number proposed. This letter acknowledges that given site conditions, the additional boring was warranted. In addition, because groundwater was not encountered in all borings additional soil samples and fewer water samples are also justified for analysis.

Further work at this site will be based upon the analytical results in these samples taken.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

c: B. Chan, files

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Mr. P. Lescure, EBA Wastechnologies, 825 Sonoma Ave., Suite C, Santa Rosa, CA 95404

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RO#319

August 4, 1997 StID # 3688

Mr. Lewis Winchell Sacramento Stucco Co., Inc. P.O. Box 1166 Sacramento CA 95691 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Re: Work Plan Approval for Former Western Stucco Products, 5115 E. 8th St., Oakland CA 94601

Dear Mr. Winchell:

Thank you for the submission of the July 24, 1997 work plan for further site investigation at the above referenced site as prepared by EBA Wastechnologies (EBA). This work plan was submitted to satisfy the County's request to further characterize the extent of the petroleum release in groundwater from the former diesel and unleaded gasoline tanks. The work plan calls for the advancement of up to six borings around the former tank pit areas and the collection and sampling of groundwater samples for chemical analysis.

- I have discussed this work plan with Mr. Pierre Lescure of EBA and have approved it with the following conditions:
- * One boring will be logged and field screened with a PID instrument. A soil sample will be collected from this boring just above groundwater for chemical analysis. It was suggested that the middle boring of the group of three immediate westerly borings will be this boring.
- * All six borings will be advanced and groundwater samples collected for chemical analysis.
- * Please notify me at least 72 hours prior to this field work so I may arrange to be present, if possible.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

c: Mr. P. Lescure, EBA Wastechnologies, 825 Sonoma Ave., Suite C, Santa Rosa, CA 95404

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DAVID J. KEARS, Agency Director



R0#319

June 19, 1997 StID # 3688

Mr. Lewis Winchell P.O. Box 1166 West Sacramento, CA 95691 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Re: Former Western Stucco, 5115 E. 8th St., Oakland CA 94601

Dear Mr. Winchell:

Thank you for the submittal of the requested documents concerning the underground tank removals at the above referenced site. I have reviewed the reports and have the following comments/requests:

- * Please complete and return the Unauthorized Release Report (ULR) previously sent to Mr. Rozewski. The documents indicate a release to soil and groundwater occurred at this site. You may choose to have your consultant complete this form in your behalf.
- * I would like to correct my June 5, 1997 letter which stated that a NORR (Notice of Requirement to Reimburse) letter would be sent to you. This should have read NOR, (Notice of Responsibility). Oversight costs for the County are no longer paid by the responsible party.
- * As stated in the EBA Wastechnologies' letter, this site may be characterized as a "low risk" soil and groundwater site. Based upon the Regional Water Quality Control Board (RWQCB) recommendation, these sites should be closed. However, these site must be adequately characterized prior to evaluation for this designation. As stated in the EBA letter, further characterization may be performed by collecting groundwater samples via a direct-push method. Therefore, please submit a work plan to perform this additional site characterization. Please submit your work plan to our office within 30 days or by July 21, 1997.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

c: B. Chan, files

Ms. C. Scheib, EBA Wastechnologies, 825 Sonoma Ave., Suite C Santa Rosa, CA 95404

wp5115

AGENCY



DAVID J. KLARG, Approx Director

June 5, 1997 StID # 3688

Mr. Walter Rozewski Western Stucco Products 860 Riske Lane W. Sacramento CA 95691 RO#319

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

Re: Request for Technical Reports for Underground Tank Closure at former Western Stucco, 5115 E. 8th St., Oakland CA 94601

Dear Mr. Rozewski:

As discussed previously with you, our office is investigating the removal of two underground tanks at the above site on March 26, 1991. Field notes from an Alameda County Environmental Health (ACEH) inspection report described potential fuel releases to soil and groundwater. However, our office did not receive the underground tank closure report. This report, provided by your contractor or consultant, should describe the activities which occurred during the removal, provide a site map indicating sample locations and all pertainent buildings and structures, provide copies of the receipt for the disposal of the tanks, soil and/or water and copies of the analytical results for all samples tested.

Because of the observations stated in the tank removal inspection report, this site has been transferred to the Local Oversight Program (LOP), within Alameda County Environmental Health, Hazardous Materials Division. Our office has been delegated by the Regional Water Quality Control Board (RWQCB) and the City of Oakland, to be the local agency which will oversee such releases of petroleum to soil and/or groundwater. A Notice of Requirement to Reimburse (NORR) letter has been sent to Mr. Lewis Winchell informing of this adminstrative action.

Enclosed, please find an Unauthorized Release (Leak) Report (ULR). This form must be completed when there has been a verified release of petroleum hydrocarbon to soil or groundwater. After our office has reviewed the tank closure report, we will determine and inform you if you need to fill out this form.

Please submit the underground tank closure report for this site within 30 days or by June 7, 1997.

This is a formal request for technical reports pursuant to both the Water Code and the California Health and Safety Code. Failure to submit the requested reports may Western Stucco to civil liability.

Mr. W. Rozewski StID # 3688 5115 E. 8th St., Oakland CA 94601 June 5, 1997 Page 2.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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enclosure

c: B. Chan, files Mr. Lewis Winchell, P.O. Box 1166, West Sacramento CA, 95691

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