

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SCWT
8-14-06

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

August 11, 2006

Mr. Allen Kanady
Omega Termite
807 75th Avenue
Oakland, CA 94621

Subject: Fuel Leak Case No. RO0000508, Omega Termite, 807 75th Avenue, Oakland, CA –
Work Plan Approval

Dear Mr. Kanady:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Well and Ozone Micro-Sparge System Installation Work Plan," dated July 31, 2006 and prepared on your behalf by AEI Consultants. The Work Plan proposes the installation of two additional deeper zone monitoring wells and an ozone sparging system. Two separate zones of soil and groundwater contamination have been identified at the site. Low flow ozone sparging is proposed at depths of approximately 17 feet bgs (shallow zone) and 35 feet bgs (deeper zone). We concur with the proposed scope of work.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL REPORT REQUEST

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

- **November 15, 2006** - Quarterly Monitoring Report for the Third Quarter 2006
- **December 15, 2006** – Start-Up Report
- **February 15, 2007** - Quarterly Monitoring Report for the Fourth 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.

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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.

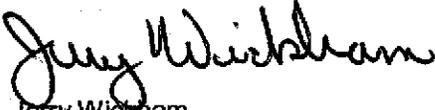
AGENCY OVERSIGHT

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Allen Kanady
August 11, 2006
Page 3

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: Robert Flory
AEI Consultants
2500 Camino Diablo Blvd., Suite 200
Walnut Creek, CA 94597

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
05-27-06

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

May 25, 2006

Mr. Allen Kanady
Omega Termite
807 75th Avenue
Oakland, CA 94621

Subject: Fuel Leak Case No. RO0000508, Omega Termite, 807 75th Avenue, Oakland, CA

Dear Mr. Kanady:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Deeper Aquifer Soil & groundwater Investigation Report," dated April 28, 2006 and prepared on your behalf by AEI Consultants. The report presents the results of soil and groundwater sampling conducted at the site in February and March 2006. Based on the sampling results, the report recommends continued groundwater monitoring, installation of two deeper zone monitoring wells, and remediation by ozone sparging. ACEH concurs with continued groundwater monitoring and the proposed installation of two additional monitoring wells in the deeper zone. Please submit a Work Plan by July 28, 2006 for the proposed well installation.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Total Petroleum Hydrocarbons as Diesel.** The fuel hydrocarbons detected in numerous groundwater samples, particularly most groundwater samples collected from the deeper zone, consist primarily of total petroleum hydrocarbons in the diesel range. Three of the four tanks removed from the site were reportedly used for gasoline storage. The history of use of the fourth tank was not reported. The laboratory reports for the groundwater sample collected from well MW-9 indicates that, "unmodified or weakly modified diesel is significant." Please review and discuss in the Work Plan requested below, the suspected source of diesel fuel at the site. Please propose activities to test this hypothesis, as appropriate.
2. **Immiscible Layer in Water Sample from Well MW-9.** An immiscible layer was observed in the groundwater sample collected from well MW-9, which is screened from 25 to 30 feet bgs. An immiscible layer was also observed in a grab groundwater sample collected approximately 30 feet bgs at sampling location SB-14. The static water level in the shallow groundwater zone is approximately 5 feet bgs. Please discuss in the Work Plan requested below, the suspected mechanism by which an immiscible layer was present in groundwater collected approximately 20 to 25 feet below the static water level.

3. **Pilot Testing.** Please propose pilot testing, as necessary, to assess the performance of the recommended cleanup technology, ozone sparging. Please present plans for pilot testing in the Work Plan requested below.

TECHNICAL REPORT REQUEST

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

- **July 28, 2006** – Work Plan
- **August 15, 2006** - Quarterly Monitoring Report for the Second Quarter 2006
- **November 15, 2006** - Quarterly Monitoring Report for the Third 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

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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

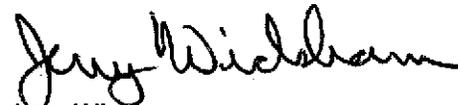
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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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: Robert Flory
AEI Consultants
2500 Camino Diablo Blvd., Suite 200
Walnut Creek, CA 94597

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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01-09-06

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

January 5, 2006

Allen Kanady
Omega Termite
807 75th Avenue
Oakland, CA 94621

Subject: Fuel Leak Case No. RO0000508, Omega Termite, 807 75th Avenue, Oakland, CA –
Work Plan Approval

Dear Mr. Kanady:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Work Plan for Characterization of Second Aquifer." The Work Plan proposes a scope of work that includes the installation of five monitoring wells to delineate the northern extent of soil and shallow groundwater contamination and the extent of contamination in a lower aquifer throughout the site. ACEH concurs with the proposed scope of work provided that technical comments 1 and 2 below are addressed during the field investigation.

ACEH previously requested that a preferential pathway and well survey be included with the Work Plan; however, a preferential pathway and well survey has not been completed for the site. Please conduct the preferential pathway and well survey, which is described in the technical comments and present the results in the Soil and Groundwater Investigation Report requested below. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Depth of Proposed Shallow Well MW-6.** Please use the continuous samples to be collected in the boring for proposed shallow well MW-6 to adjust the screen interval upward if necessary, to avoid screening the well across two separate water-bearing units. The proposed depth of shallow monitoring well MW-6 is 18 feet below ground surface (bgs). The base of the shallow aquifer was apparently encountered in Boring SB-14 at a depth of approximately 14 feet bgs. A saturated clayey sand zone was encountered in boring SB-14 at a depth of approximately 19 to 20 feet bgs. The clayey sand zone encountered at approximately 19 to 20 feet bgs may be a separate water-bearing zone from the shallow aquifer. Proposed well MW-6 is not to be screened across two potentially separate water-bearing units.
2. **Well Construction.** Existing monitoring wells at the site were constructed with 0.02-inch slot size screens. The Work Plan proposes the use of 0.010-inch factory slotted screens. The selection of 0.010-inch slotted well screens is not consistent with the coarse-grained soils that

are expected to be encountered in the second aquifer. Please revise the slot size as necessary based on the types of soils within the screen intervals for the wells.

3. **Table 1 – Well Construction Details.** In future documents, please correct the values for the filter pack intervals on Table 1. The current values shown on the table represent the combined depth intervals for the grout and bentonite seals.
4. **Preferential Pathways and Well Survey.** Please evaluate whether any potential preferential pathways may exist at the site. The preferential pathway study shall include a well survey of all wells (monitoring and production wells: active, inactive, standby, decommissioned (sealed with concrete), abandoned (improperly decommissioned or lost); and dewatering, drainage, and cathodic protection wells) within a 1/2-mile radius of the subject site. Please review historical maps such as Sanborn maps, aerial photos, etc., when performing the background study. Submittal of map(s) showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. Include appropriate prints of historic aerial photos used as part of your study. We also request that you list by date all aerial photographs available for the site from the aerial survey company or library you use during your study. Refer to the Regional Board's guidance for identification, location, and evaluation of potential deep well conduits when conducting your preferential pathway study. Please identify any sensitive receptors near the site. The evaluation of preferential pathways and well survey are to be included in the Work Plan requested below
5. **Cross Sections.** The two cross sections included in the Work Plan were very useful for reviewing site conditions. Please update or supplement these cross sections with additional data collected during the proposed investigation and present the updated cross sections in the Soil and Groundwater Investigation Report requested below.

TECHNICAL REPORT REQUEST

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

- **May 10, 2006** – Soil and Groundwater Investigation Report
- **60 days after ACEH comments on Soil and Groundwater Investigation Report – Corrective Action Plan**

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

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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

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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: Robert Flory
AEI Consultants
2500 Camino Diablo Blvd., Suite 200
Walnut Creek, CA 94597

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
9-19-05

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

September 19, 2005

Allen Kanady
Omega Termite
807 75th Avenue
Oakland, CA 94621

Subject: Fuel Leak Case No. RO0000508, Omega Termite, 807 75th Avenue, Oakland, CA

Dear Mr. Kanady:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the most recent report entitled, "Groundwater Monitoring Report, Third Quarter, 2005" dated August 12, 2005 and prepared on your behalf by AEI Consultants. ACEH is concerned with the elevated concentrations of fuel hydrocarbons that have been detected in groundwater at the site. In particular, the concentrations of fuel hydrocarbons detected in groundwater have increased over time in several of the monitoring wells. This indicates that a significant source of petroleum hydrocarbons remains at the site that will require cleanup.

The extent of petroleum hydrocarbons in the lower water-bearing zone at the site has not been delineated. Elevated concentrations of fuel hydrocarbons were detected in the groundwater sample collected from boring SB-14 at a depth of 28 feet below ground surface. ACEH requests that a Work Plan be prepared to complete delineation of soil and groundwater contamination.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Site Characterization.** The lateral and vertical extent of soil and groundwater contamination at the site has not been fully defined. Please present plans to fully define the lateral and vertical extent of soil and groundwater contamination at the site in the Work Plan requested below.
2. **Results from October 9 and 10, 2003 Investigation.** A site investigation consisting of seven direct push borings was conducted at the site on October 9 and 10, 2003. A report presenting the results of this investigation has apparently not been submitted to ACEH. Please provide a report with the results of this investigation or present the results of the October 9 and 10, 2003 investigation in the Work Plan requested below. Presentation of these results is to include all necessary tables, figures, and appendices required to fully document the investigation.

3. **Sampling Location Map and Cross Sections.** Please include a map showing all previous sampling locations and a minimum of one cross section for the site. The cross section(s) are to be added to illustrate the lateral and vertical extent of soil layers, where groundwater was first encountered in borings and the static water levels, observations of free product, staining, and odor, and sample locations and results. Please include the sampling location map and cross section(s) in the Work Plan requested below.
4. **Preferential Pathways and Well Survey.** Please evaluate whether any potential preferential pathways may exist at the site. The preferential pathway study shall include a well survey of all wells (monitoring and production wells: active, inactive, standby, decommissioned (sealed with concrete), abandoned (improperly decommissioned or lost); and dewatering, drainage, and cathodic protection wells) within a 1/2-mile radius of the subject site. Please review historical maps such as Sanborn maps, aerial photos, etc., when performing the background study. Submittal of map(s) showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. Include appropriate prints of historic aerial photos used as part of your study. We also request that you list by date all aerial photographs available for the site from the aerial survey company or library you use during your study. Refer to the Regional Board's guidance for identification, location, and evaluation of potential deep well conduits when conducting your preferential pathway study. Please identify any sensitive receptors near the site. The evaluation of preferential pathways and well survey are to be included in the Work Plan requested below
5. **Geotracker EDF Submittals.** Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude to sub-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB GeoTracker system via the internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports is also required in Geotracker (in PDF format). Please upload all analytical data (collected on or after September 1, 2001), to the SWRCB's GeoTracker database website in accordance with the above-cited regulation by **November 4, 2005**.

TECHNICAL REPORT REQUEST

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

- **November 22, 2005 – Work Plan for Soil and Groundwater Investigation and Results from October 9 and 10, 2003 Investigation**
- **120 days after ACEH approval of Work Plan – Soil and Groundwater Investigation Report**

- 60 days after ACEH comments on Soil and Groundwater Investigation Report – Corrective Action Plan

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

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UNDERGROUND STORAGE TANK CLEANUP FUND

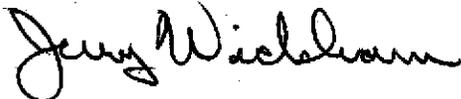
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AGENCY OVERSIGHT

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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: Robert Flory, AEI Consultants, 2500 Camino Diablo Blvd., Suite 200, Walnut Creek, CA
94597

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



10-06-02

November 5, 2002

Mr. Allan Kanady
Omega Termite Control
807 75th Ave.
Oakland, CA 94621

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

Dear Mr. Kanady:

Subject: Fuel Leak Case No. RO0000508, Omega Termite Control, 807 75th Ave., Oakland, CA 94621

Alameda County Environmental Health, Local Oversight Program (LOP), has received and reviewed the case file up to and including the October 14, 2002 Quarterly Groundwater Monitoring and Sampling Report prepared by AEI Consultants, your consultant. We request that you address the following technical comments and submit the technical reports requested below.

Technical Comments:

- Our office last wrote to you in my June 28, 2002 letter wherein I requested that you submit a RAP/FS and additional site investigation plan by August 16, 2002. To date, our office has not received the requested technical report.
- The October 14, 2002 report did not include a summary table of groundwater monitoring data. Please ensure that this is included in all monitoring reports.
- Figure 2 in the October 14, 2002 reported an error for groundwater concentrations in MW-1. Please correct this error and submit a corrected Figure 2.
- Because of the elevated TPH concentrations exhibited in TW-5, our office requests you begin interim remediation in this well. Measures such as well over-purging, chemical oxidation, enhanced bio-remediation, oxygenation et al should be considered.

Technical Report Request:

- November 20, 2002- Provide summary analytical table and corrected Figure 2.
- December 5, 2002- Implement an approved interim remediation program in TW-5
- December 19, 2002- Submit the previously requested RAP/FS and site investigation work plan.

Please note that delays in investigation, late or non-submitted reports may result in your becoming ineligible for the Underground Storage Tank 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

Mr. P. McIntyre, AEI Consultants, 3210 Old Tunnel Rd., Suite B, Lafayette, CA 94549-4157

2ndprq807 75th

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

June 28, 2002
RO0000508

Mr. Allan Kanady
Omega Termite Control
807 75th Ave.
Oakland, CA 94621

Dear Mr. Kanady:

Subject: Fuel Leak Case, Omega Termite Control, 807 75th Ave., Oakland, CA 94621

Alameda County Environmental Health, Local Oversight Program (LOP), has received and reviewed the case file up to and including the June 19, 2002 Quarterly Groundwater Monitoring and Sampling Report prepared by AEI Consultants, your consultant. We have determined that additional information is needed at your site to progress toward case closure. We request that you address the following technical comments and submit the technical report requested below.

Technical Comments

- The extent of the petroleum hydrocarbon plume has not been defined, both up and down-gradient. The plume has likely migrated beyond the property boundaries.
- The low concentration of dissolved oxygen in groundwater will not enhance natural biodegradation of the contaminant
- Fluctuating concentrations of TPH reported in TW-5 and MW-1 indicate the presence of residual contamination within the saturated soil. Remediation of this residual contamination is recommended.
- A utilities and sensitive receptor survey should be performed for the site.
- We concur that a Remedial Action Plan/Feasibility Study should be performed for the site.
- We concur that MTBE may be omitted in future monitoring events based on past results, however, MTBE should be run during additional site investigations and prior to requesting site closure.

Technical Report

- August 16, 2002- Please submit a RAP/FS and additional site investigation plan to address the aforementioned technical comments.

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

Sincerely,

A handwritten signature in black ink that reads "Barney M. Chan".

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. P. McIntyre, AEI Consultants, 3210 Old Tunnel Rd., Suite B, Lafayette, CA 94549-4157

Rprq807 75thAve

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



03-01-02

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

February 28, 2002
RO0000508

Mr. Allan Kanady
Omega Termite
807 75th Ave.
Oakland, CA 94621

Re: Environmental Investigation at 807 75th Ave., Oakland CA 94621

Dear Mr. Kanady:

Our office has received and reviewed the February 20, 2002 Quarterly Groundwater Monitoring Report for September 2001 and February 2002 for the above referenced site as prepared by AEI Consultants. Our office has the following observations and recommendations:

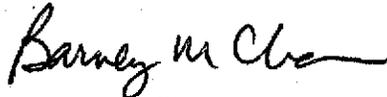
- The presence of elevated diesel and motor oil concentrations in the water sample from TW-5 during the 9/01 sampling event is a concern. There was no explanation given for this significant increase in contamination. Could this have been an act of vandalism? The condition of the well cap & lock was not reported for this well on your sampling form. Our office recommends remediation be performed from this well, since this contamination can migrate beneath the adjacent office building. Possible options are groundwater purging/extraction, chemical oxidation and/or oxygen addition. All water samples have exhibited low dissolved oxygen concentrations and negative Redox readings. The addition of oxygen to the plume could enhance aerobic biodegradation, the preferred way.
- Although the presence of MTBE was reported in the groundwater sample from TW-5, it was the result of analysis by method 8020. Significant levels of MTBE should be confirmed using Method 8260.
- Please check the units used to report groundwater conductivity. Is it uS or mS? Note that a conductivity greater than 5000 uS/cm is considered non-potable.
- Please attempt to determine the dissolved oxygen in groundwater samples at similar temperatures. The reported differences from quarter to quarter cannot be directly compared if taken at different temperatures.
- Once stable petroleum contaminant concentrations have been reached, you may consider requesting site closure.

Mr. Allan Kanady
Omega Termite, 807 75th Ave., Oakland, CA 94621
February 28, 2002
RO0000508
Page 2

Please provide a written response to this letter within 30 days or no later than 3/28/02.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. P. McIntyre, AEI Consultants, 3210 Old Tunnel Road, Ste. B, Lafayette, CA
94549-4157

02-807 75th Ave

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



06-25-01

June 19, 2001

Scott DeMuth
Sears, Roebuck, & Co.
333 Beverly Rd., Dept. 824ev, A2-245A
Hoffman Estates, IL 60179

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

Dear Mr. DeMuth:

Subject: Sears Store #1039, 1911 Telegraph Ave., Oakland, CA 94612
RO0000508

"4th Quarter 2000, Groundwater Monitoring and Sampling Report" dated January 9, 2001 by IT Corporation was reviewed. Monitoring wells MW-1, MW-2, MW-3, MW-4, MW-5, MW-6 MW-7, MW-8, and MW-9 were sampled on November 6, 2000 and analyzed for total petroleum hydrocarbons as gasoline (TPH-G), benzene, toluene, ethyl benzene, xylene (BTEX), methyl tertiary-butyl ether (MTBE), and halocarbons. Monitoring well MW-7 continues to have the highest concentrations of TPH-G and BTEX. MW-7 had 6,000 ug/l TPH-G, 3,400 ug/l, 29 ug/l, 230 ug/l, and 330 ug/l BTEX. All purgeable halocarbon concentrations were less than the Oakland Tier 1 Risk Based Screening Levels (RBSL) for groundwater inhalation of indoor and outdoor air vapors, commercial/industrial land use, carcinogenic risk. Oil & grease was analyzed for MW-4 and MW-6 samples. The concentrations for oil & grease for MW-4 and MW-6 was <1,000 ug/l, same as for the prior quarter.

Concentrations of TPH-G and benzene in MW-7 have not shown a decline. Therefore, if the results for MW-7 for the next round of sampling are consistent with those obtained recently, then a Corrective Action Plan, which includes an assessment of impacts, a feasibility study, and applicable cleanup levels should be considered. Also, well installation information for monitoring wells MW-1, MW-5, MW-6, and MW-7, requested in our letters dated December 13, 1990 and December 1, 2000 have not been provided. (In regards to MW-1, a letter dated January 11, 1991 by Dames & Moore referred us to their report entitled "Toxics and Underground Tank Removals, Post Construction Report, Emporium Capwell, Oakland, CA" dated March 21, 1988. This report lacked construction details.) If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist

u
C: David Bero, IT Corporation, 4005 Port Chicago Highway, Concord, CA 94520-1120
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 8-21-2000

RO# 508

August 21, 2000
StID # 1650

Mr. Allen Kanady
Omega Pest Control
807 75th Ave.
Oakland CA 94621

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

**Re: Soil and Groundwater Investigation at Omega Pest Control, 807 75th Ave.,
Oakland CA 94621**

Dear Mr. Kanady:

Our office has received and reviewed the August 16, 2000 Over-Excavation and Tank Removal report performed at the above referenced site prepared by AEI Consultants. This report details the field work and results of the March 2000 soil excavation and tank removal. It appears that the excavation was fairly successful in removing contaminated soil, with the exception of the eastern sidewall, which was limited due to the entrance driveway. It is hoped that groundwater concentrations will reflect the removal of the source petroleum contamination.

Our office concurs with AEI's recommendation to continue groundwater monitoring at this site. You should continue to analyze the water samples for TPH as gasoline, BTEX and MTBE. In addition, please sample the groundwater from a sample taken from the extraction casing placed within the extraction pit. This water sample should be run for the same analytes mentioned above plus TPH as diesel and TPH as motor oil. To monitor the potential for natural bio-remediation, please also monitor for dissolved oxygen and oxidation-reduction potential in the groundwater samples. Monitoring should continue quarterly until groundwater concentrations appear stable or declining at which time, your consultant may recommend a change in sampling frequency.

You should also provide a work plan to either, remediate and re-sample the excavated soils or dispose of these soils properly. You are reminded that until a work plan is provided and approved by our office the excavated soils should remain covered and secured from water infiltration.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. P. McIntyre, AEI Consultants, 3210 Old Tunnel Rd., Suite B., Lafayette, CA 94549

3sst1807 75th

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SNT 3-15-2020
in old cells

March 14, 2000
StID #1650

Ro508

Mr. Allen Kanady
Omega Pest Control
807 75th Ave.
Oakland CA 94621

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

Re: Site Remediation at Omega Pest Control, 807 75th Ave., Oakland CA 94621

Dear Mr. Kanady:

This letter serves to clarify the County's understanding of currently scheduled remediation activities scheduled at the above site. As you may recall, after the initial tank removals performed in August 1996, All Environmental Inc. (AEI) proposed limited over-excavation of the tank pit from beneath the former 1000 gallon tank and to the west and northwest of the former 8000 gallon tank. (11/6/96 work plan). This work plan, was conditionally approved in the County's November 7, 1996 letter. The County requested over-excavation on all four sides of the tank pit with confirmation samples taken from each sidewall.

This work plan was put on hold pending the installation of monitoring wells and additional borings to delineate the extent of contamination, performed in June 1999. Upon review of the AEI report of this work, our office commented on AEI's recommendation to de-water the excavation and remove contaminated soil. We stated that the additional soil removal was not necessary, however, we recommended that several remediation wells be installed within the tank pit.

Recently, our office was informed of your intention to perform the initially approved work plan with slight modifications. As requested, all four sides of the former tank pit will be over-excavated along with removing the soil within the pit, down to groundwater. This soil will be stockpiled and aerated with the intention of reusing it as backfill when deemed clean. The accumulated water in the pit will be removed into a holding tank. Because the excavated soil is intended to be aerated and reused, please consider over-excavating as much of the affected soil as possible, both laterally and vertically. Our office will require confirmation soil samples from the sidewalls and bottom of the pit. The previously aerated soils from the tank removal will be used to backfill the pit. Our office also recommends the installation of at least one extraction casing in the pit with a minimum 4" diameter. Our office approves of this work.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. P. McIntyre, AEI, 3210 Old Tunnel Rd., Suite B. Lafayette, CA 94549

2ssi807 75th

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Sent 1/27/00
Includ. cc's

RD508

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

January 27, 2000
StID # 1650

Mr. Allen Kanady
Omega Pest Control
807 75th Ave.
Oakland CA 94621

Re: Omega Pest Control Environmental Investigation, 807 75th Ave., Oakland CA 94621

Dear Mr. Kanady:

Thank you for the submission the January 19, 2000 fourth quarter 1999 groundwater monitoring report as prepared by All Environmental Inc. (AEI). Our office concurs with the recommendation for continuing quarterly groundwater monitoring. We further recommend that an estimate of the "highest" groundwater concentration be made and based upon this result, you should consider if remediation is warranted.

As you may recall, this point was bulleted in my September 20, 1999 letter. This need is the result of the inability to install a monitoring well directly down-gradient of the former underground gasoline tanks. Such information is necessary to determine human health risk in the future. My recommendation then was to install several large diameter extraction casings within the former tank pit. These casings could be used for either groundwater sampling or treatment. Please advise how you will obtain the requested groundwater data.

Please note that the stockpiled soils are deemed to be aerated sufficiently to be reused as backfill when bringing the tank pit back to surface depth.

Please respond to this letter in writing within 30 days or no later than February 29, 2000.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. P. McIntyre, AEI, 3210 Old Tunnel Road, Suite B, Lafayette, CA 94549

ssi807 75th

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

ROS98

September 20, 1999
StID # 1650

Mr. Allen Kanady
Omega Pest Control
807 75th Ave.
Oakland CA 94621

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

Re: Omega Pest Control Subsurface Investigation at 807 75th Ave., Oakland CA 94621

Dear Mr. Kanady:

Our office has received and reviewed the September 16, 1999 **Soil Boring and Groundwater Monitoring Well Installation Report** for the above site as prepared by All Environmental, Inc. (AEI). This report describes the results of soil and groundwater sampling from the four monitoring wells installed at this site on June 25, 1999. As you may be aware, certain limitations prevented the location of wells immediately adjacent to the existing office building.

From the results of the investigation it appears that extent of soil contamination has been determined with the exception of the north direction (near MW-2). Groundwater is impacted with gasoline and BTEX (benzene, toluene, ethyl benzene and xylenes) immediately next to the former tank pit, however, less so on the other side of the office building (MW-4). Groundwater is first encountered at approximately 15' bgs and equilibrates to about 6' bgs.

Your consultant recommends de-watering the excavation and the removal of impacted soil, if necessary. They further recommend the characterization of the existing stockpiled soil on-site and its proper disposal and continual groundwater monitoring. Our office has the following comments to these recommendations:

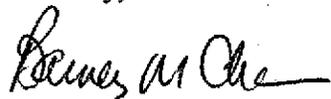
- At this time, our office does not require the removal of any additional soil, however, we are concerned about obtaining a better idea of the concentration of the gasoline plume migrating beneath the existing office building. To do this, our office recommends the installation of several remediation wells within the former tank pit. These wells may then be used for sampling, extraction or the addition of supplements.
- My May 27, 1999 letter requested additional information on the Geo Plexus report which characterized the stockpiled soils at the site. If this information is not available, please provide a sampling work plan to properly characterize this soil. I would recommend the immediate submission of this work plan if you have any inclination to reuse these soils. In any event, the tank pit should be back-filled and the area surfaced as soon as possible.
- Our office concurs with the continuing monitoring of the wells on a quarterly basis.

Please submit a work plan to address the above items within 30 days or by October 22, 1999.

Mr. A. Kanady
Omega Pest Control
807 75th Ave., Oakland CA 94621
September 20, 1999
Page 2.

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

Sincerely,



Barney M. Chan,
Hazardous Materials Specialist

C: B. Chan, files

Mr. P. McIntyre, All Environmental Inc., 901 Moraga Rd., Suite C, Lafayette, CA
94549-4567

2ssl807-75th

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RW 508

May 27, 1999
StID # 1650

ENVIRONMENTAL HEALTH SERVICES

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

Mr. Allen Kanady
Omega Pest Control
807 75th Ave.
Oakland CA 94621

Re: Work Plan for the Installation of Monitoring Wells at 807 75th Ave., Oakland 94621

Dear Mr. Kanady:

Our office has received and reviewed the May 21, 1999 work plan for the installation of four (4) monitoring wells to be named AEI-1 through AEI-4 as shown on Figure 3 of this report. Both soil and groundwater samples will be collected from each well and analyzed for the parameters; Total Petroleum Hydrocarbons as gasoline, BTEX, MTBE and total lead. This work plan has been discussed with our office and it is accepted. Please schedule this work **within the next 30 days** and inform our office prior to initiating it. You should be prepared to initiate groundwater monitoring of these wells on a quarterly basis until further notice.

Please be aware that because you have chosen not to perform any over-excavation at the site, there will be a need to further investigate the areas where elevated benzene soil concentrations were found. At a minimum, a risk based corrective action (RBCA) evaluation must be performed to determine the risk to human health.

Our office has also received a copy of the November 24, 1998 Geo Plexus report regarding the sampling of the stockpiled soils at your site. Please be advised that our office will require additional information before we can make any decision regarding its disposition. Please clarify the amount of soil in each pile, its dimension, the depth of each soil sample and a description of any remediation actions performed on the soil.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. P. McIntyre, All Environmental, Inc., 901 Moraga Rd., Suite C, Lafayette, CA 94549-4567

mwap-807-75th

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Rosok

ENVIRONMENTAL HEALTH SERVICES

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

May 27, 1999

STID #1650

Mr. Allen Kanady
Omega Pest Control
807 75th Ave.
Oakland CA 94621

RE: Omega Pest Control, 807 75th Ave., Oakland CA 94621

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Kanady:

This letter is to inform you of new legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, you have been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.

LANDOWNER NOTIFICATION

Re: 807 75th Ave., Oakland CA 94621

May 27, 1999

Page 2 of 2

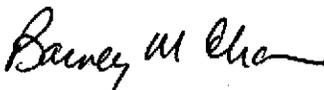
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

You may use the enclosed "notice of proposed action" form (sample letter 3) as a template to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

Please call me at (510) 567-6765 should you have any questions about the content of this letter.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 508

March 15, 1999
StID # 1650

Mr. Allen Kanady
Omega Termite Control
807 75th Ave.
Oakland CA 94621

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 Omega Termite, 807 75th Ave., Oakland CA 94621

Dear Mr. Kanady:

This letter acknowledges the receipt of your March 10, 1999 letter and the attached proposed work plan from GeoPlexus, Inc. There appears to be a number of issues needing further clarification. Because you are intending to obtain three bids for your proposed work, I hope this means you have applied and are eligible for the Underground Storage Tank Cleanup Fund.

The first item of concern is the stockpiled soils. I have received a copy of the analytical results from eight soil samples taken from these soils. Before I can make any decision on the use of this soil, you must send me a full report on this sampling. It should include a sampling map, a description of the size and amount of soil sampled and the depth of each sample. Please have your consultant make a recommendation for the future use of this soil.

Secondly, you have made a request that our office reconsider the need to install permanent monitoring wells. Groundwater data from a permanent well is necessary to determine the extent of groundwater contamination and to determine potential health risk due to the presence of such groundwater contamination. Temporary grab groundwater samples are not representative of actual groundwater conditions.

Lastly, I cannot evaluate the Geo Plexus proposal due to its lack of site specific information. In fact, the proposal to you states in Task 2.2 that a work plan update would be prepared for our office's review and authorization. Therefore, you are requested to submit a stockpile soils report and an actual work plan, including monitoring well installation, to our office **within 30 days or by April 16, 1999**. In addition, your work plan should be from your consultant of choice and not from a consultant under consideration.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Cathrene Glick, Geo Plexus, Inc., 1900 Wyatt Drive, Suite 1, Santa Clara CA, 95054
Reps-807-75th

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0# 508

February 10, 1999
StID # 1650

Mr. Allen Kanady
Omega Termite Control
807 75th Ave.
Oakland CA 94621

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

SECOND NOTICE OF VIOLATION

Re: Soil Remediation, Excavation and Monitoring Well Installation at 807 75th Ave.,
Oakland CA 94621

Dear Mr. Kanady:

This letter is the Second Notice of Violation for the above site. The initial Notice of Violation was issued in my April 29, 1998 letter. It requested that you complete the items in the previously approved recommendations from All Environmental. Their recommendations included over-excavation and re-sampling of the underground storage tank pit and remediation and sampling of all stockpiled soils. I also requested a work plan for the installation of a minimum of three groundwater monitoring wells. Your response to this request was to be provided by May 29, 1998.

Your May 20, 1998 letter stated you did not have the funds to complete the project and requested our office's input. My August 31, 1998 served to clarify the function of the Underground Storage Tank Cleanup Fund (the Fund). Hopefully, you have contacted the Fund, applied and have been given some expectation as to if and when funds may be available for reimbursement. Portions of your prior expenses may be eligible for reimbursement.

Please provide your monitoring well installation work plan and provide your schedule for soil over-excavation and soil remediation within 30 days or by March 15, 1999.

Your failure to provide the requested reports will cause this site to be referred to the District Attorney Office for enforcement. It will also negate your Cleanup Fund eligibility. Your prompt reply is recommended.

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. J. Pucci, All Environmental, 3364 Mt. Diablo Blvd., Lafayette, CA 94549-4567

2NOV807-75

901 Moraga Rd., Ste C,

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 508

February 10, 1999
StID # 1650

Mr. Allen Kanady
Omega Termite Control
807 75th Ave.
Oakland CA 94621

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

SECOND NOTICE OF VIOLATION

**Re: Soil Remediation, Excavation and Monitoring Well Installation at 807 75th Ave.,
Oakland CA 94621**

Dear Mr. Kanady:

This letter is the Second Notice of Violation for the above site. The initial Notice of Violation was issued in my April 29, 1998 letter. It requested that you complete the items in the previously approved recommendations from All Environmental. Their recommendations included over-excavation and re-sampling of the underground storage tank pit and remediation and sampling of all stockpiled soils. I also requested a work plan for the installation of a minimum of three groundwater monitoring wells. Your response to this request was to be provided by May 29, 1998.

Your May 20, 1998 letter stated you did not have the funds to complete the project and requested our office's input. My August 31, 1998 served to clarify the function of the Underground Storage Tank Cleanup Fund (the Fund). Hopefully, you have contacted the Fund, applied and have been given some expectation as to if and when funds may be available for reimbursement. Portions of your prior expenses may be eligible for reimbursement.

Please provide your monitoring well installation work plan and provide your schedule for soil over-excavation and soil remediation within 30 days or by March 15, 1999.

Your failure to provide the requested reports will cause this site to be referred to the District Attorney Office for enforcement. It will also negate your Cleanup Fund eligibility. Your prompt reply is recommended.

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. J. Pucci, All Environmental, 3364 Mt. Diablo Blvd., Lafayette, CA 94549

2NOV807-75

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

August 21, 1998
DAVID J. REARS, Agency Director
StID # 1650

Ro# 508

Mr. Allen Kanady
Omega Termite Control
807 75th Ave.
Oakland CA 94621

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

**Re: Underground Storage Tank Removal and Investigation at Omega Termite Control,
807 75th Ave., Oakland 94621**

Dear Mr. Kanady:

This letter serves to clarify the status of your tank removal and subsurface investigation at the above site. As you will recall, my April 29, 1998 letter requested technical reports as well as clarification for the additional investigation initially proposed by All Environmental. Your May 20, 1998 letter in response requires clarification from our office.

Apparently, you believe that the Underground Storage Tank Cleanup Fund (the Fund) will somehow cover all your expenses to perform the requested work. This is a very simplistic view of the Fund. Hopefully, you have applied for the Fund and have been given some indication as to if and when your application will be accepted. Be aware, the Fund requires that the responsible party make normal progress in their investigation. This means that the responsible party must be consistently performing some work at their site every quarter (3 months). Inactivity for longer than this period can cause the site to become non-compliant and therefore forfeit reimbursement eligibility. Another misconception, is the Fund will advance the responsible party money to perform the required work. The Fund reimburses applicants for pre-approved expenses which have been spent after being approved by the oversight agency.

It, therefore, benefits you to remain in compliance by performing the requested work and getting pre-approval for the work from the Fund. The failure to perform work in a timely fashion will risk your eligibility for any reimbursement. The items requested previously are necessary to obtain site closure, fulfill your legal responsibility and restore current property value. This also insures that there is no potential risk to on-site and off-site worker or residents.

The items ; monitoring well work plan, over-excavation and sampling and stockpiled soil remediation are all potentially reimburseable items. You are encouraged to remain in compliance and schedule this work immediately. Please contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Ms. J. Pucci, All Environmental, 3364 Mt. Diablo Blvd., Lafayette, CA 94549
Clar807

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

Ro# 508

April 29, 1998
StID # 1650

Mr. Allen Kanady
Omega Termite Control
807 75th Ave.
Oakland, CA 94621

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: Soil Remediation, Excavation and Monitoring Well Installation
At Omega Termite Control, 807 75th Ave., Oakland CA 94621**

Dear Mr. Kanady:

After the removal of the three underground fuel tanks at the above site, on September 15, 1996, All Environmental, your consultant provided work plans to aerate and remediate the excavated soils and advance borings around the former tank pit to determine the extent of soil and groundwater contamination. Our office approved these work plans and on January 10, 1997, six borings (BH-1 through BH-6) were advanced around the former tank pit. The results of this investigation identified elevated levels gasoline and BTEX in soil and groundwater.

A preliminary ASTM Tier 1 evaluation of these results indicates a potential human health risk to individuals working in a commercial setting, ie your office workers. Based on these results, All Environmental proposed limited soil excavation to the northwest and southeast of the former tank pit and the installation of three monitoring wells. Our office concurred with this proposal and requested that a work plan for the installation of monitoring wells be submitted to our office by **June 10, 1997**. This letter also requested that the soil excavation be initiated by the same date. The aeration of the stockpiled soils was put on hold pending the excavation of these additional areas of concern.

To date, our office has not received:

- the requested work plan for monitoring well installation
- notification of any over-excavation and re-sampling or
- notification of the status of stockpiled soil remediation.

This site is out of compliance. Please provide the above noted items within 30 days or by **May 29, 1998**.

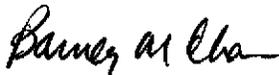
Mr. Allen Kanady
StID # 1650
807 75th Ave., Oakland CA
April 29, 1998
Page 2.

This is a formal request for technical reports pursuant to the Water Code 13267 (b) and Title 23, Division 3, Chapter 16, Section 2652d. Per Chapter 6.7 of the Health and Safety Code, Section 25299, the failure to report an unauthorized release, or properly close an underground tank system may subject the owner or operator of the underground tank system to a civil penalty of not less than \$500 or more than \$5000 per day for each underground tank, for each day of violation.

Enclosed please find another Unauthorized Release (Leak) Report for your completion. An initial Leak Report was sent to you in my August 23, 1996 letter and asked to be returned within 10 days of receipt.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Enclosure

C: B. Chan, files
Ms. Jennifer Pucci, All Environmental, 3364 Mt. Diablo Blvd.,
Lafayette, CA 94549

Nov807

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#508

May 9, 1997
StID # 1650

Mr. Allen Kanady
Omega Termite
807 75th Ave.
Oakland CA 94621

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION (LOP)
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-8577
(510) 567-6700
FAX (510) 337-9335

Re: Further Subsurface Investigation at Omega Termite, 807 75th Ave., Oakland CA 94621

Dear Mr. Kanady:

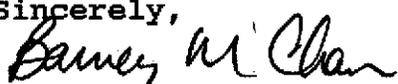
Our office has received the March 17, 1997 work plan proposal from All Environmental, Inc. (AEI) which addresses the excavation and aeration of contaminated soil at the above referenced site. As you may recall, this work was previously approved by our office. Its implementation was postponed because it is more prudent to attempt to determine the limits of petroleum contamination prior to excavation. This was done by advancing borings around the tank pit and was reported in All Environmental's March 17, 1997 Phase II report.

After my review of this report, I concurred with AEI's recommendation to excavate soils in the two areas around the tank which exhibited elevated benzene concentration; northwest and southeast of the former tank pit. In addition, I concurred with the recommendation for the installation of three monitoring wells to determine the impact of the fuel release to groundwater. I then requested that a work plan be submitted to our office to perform these two items. Because limited excavation has been previously approved, please submit a work plan for the installation of monitoring wells at this site **within 30 days or by June 10, 1997.**

You should also initiate your soil excavation by this same date. This will insure that you are making a continual effort to address the petroleum fuel leak, a requirement for eligibility for reimbursement from the State Water Resources Clean-up Fund.

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

Sincerely,


Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
J. Anderson, AEI, 3364 Mt. Diablo Blvd., Lafayette, CA 94549
2-807-75

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

70508

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

January 16, 1997
StID # 1650

Mr. Allen Kanady
Omega Termite Control
807 75th Ave.
Oakland CA 94621

**Re: Phase II Work Plan for Omega Termite Control, 807 75th Ave.,
Oakland 94621**

Dear Mr. Kanady:

Our office has received and reviewed the January 10, 1997 work plan for a Phase II investigation at the above referenced site as prepared by All Environmental. This work plan was provided to insure that every effort is made to determine the extent of contamination prior to any overexcavation. It is anticipated that overexcavation may still be advisable if the extent of contamination can be delineated. Six borings are proposed to be advanced around the former tank pit. Soil samples will be screened starting at three feet bgs (below ground surface) and then every five feet thereafter. At least one soil sample will be analyzed per boring. In addition, a grab groundwater sample will be obtained for analysis from borings BH-1, BH-4 and BH-6. All samples will be analyzed for TPHg, (total petroleum as gasoline), BTEX (benzene, toluene, ethyl benzene and xylenes) and MTBE (methyl t-butyl ether).

This work plan is accepted with the condition that boring BH-6 be moved to a location south of the former 500 gallon gasoline tank. Recall, high residual gasoline and BTEX was detected in the sample beneath this tank. I spoke with Ms. Jennifer Anderson of All Environmental. She stated that this change in boring location was possible.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

c: Ms. J. Anderson, All Environmental Inc., 3364 Mt. Diablo
Blvd., Lafayette, CA 94549
B. Chan, files PHII807

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO#508

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

November 7, 1996
StID # 1650

Mr. Allen Kanady
Omega Termite Control
807 75th Ave.
Oakland CA 94621

**Re: Work Plan for Excavation & Aeration at Omega Termite Control,
807 75th Ave., Oakland 94621**

Dear Mr. Kanady:

Our office has received and reviewed the November 6, 1996 All Environmental, Inc. work plan for the above referenced site. The work plan calls for the removal of all sloughed soil, the overexcavation and resampling of the pit, the aeration of excavated soil and the removal of groundwater from the tank pit. This work plan is acceptable as a first step, with the following conditions:

1. Please perform overexcavation on all four sides of the tank pit. At least one confirmatory soil sample should be taken from each sidewall in the presence of an ACDEH representative.
2. The analytical results of samples from both the overexcavation soils and the initial stockpiled soils should be used to determine the amount of soil which may be exposed for aeration in accordance with Air Board regulation.
3. Air monitoring during the aeration of soils should be performed to verify that the action limit of 1 ppm is not exceeded within and beyond the limits of the actual work. Workers and individuals both on and offsite must be protected.
4. In regards to confirmatory soil sampling of the aerated soils, please collect minimally one 4-point composite sample per every 50 cubic yards of remediated soil.
5. Please notify our office at least **two working days** prior to your field work so I may arrange to be present if possible.

Please be aware that a groundwater investigation will be required as the next step of your investigation.

Mr. Allen Kanady
807 75th Ave.
StID # 1650
November 7, 1996
Page 2.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: Ms. J. Anderson, All Environmental Inc., 3364 Mt. Diablo
Blvd., Lafayette, CA 94549

B. Chan, files

wpap807

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



20508

DAVID J. KEARS, Agency Director

August 23, 1996
StID # 1650

Mr. Allen Kanady
Omega Termite Control
807 75th Ave.
Oakland CA 94621

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

Re: Omega Termite Control, 807 75th Ave., Oakland 94621

Dear Mr. Kanady:

Our office has received and reviewed analytical results from soil and grab groundwater samples taken after the removal of the three underground gasoline tanks at the above site. These results were transmitted to us by Ms. Jennifer Anderson of All Environmental, Inc., your contractor. Based on these results, it is apparent that this site has experienced a release of petroleum contamination, the extent of which, must be determined and potentially remediated.

Your site has, therefore, 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), to be the local agency which will oversee such releases to soil and/or groundwater. A Notice of Requirement to Reimburse (NORR) letter has recently been sent to your attention informing you of this administrative action.

The analytical results support my observations during the tank removal. Odorous soils were observed in the soil samples from beneath the tanks and an apparent hydrocarbon sheen was observed on the water within the pit.

You are, therefore, requested to provide a work plan to determine the extent of the petroleum contamination in both soil and groundwater. As an initial approach, your consultant has recommended selective overexcavation of residual contaminated soils. Our office agrees with this approach, since apparent contaminated backfill soils still exist in the pit. In addition, you are requested to install a fence affixed with CAUTION tape around the pit to prevent public access.

Please submit your work plan for site assessment to our office within 30 days or by September 27, 1996.

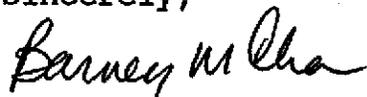
Enclosed, please find an Unauthorized Release (Leak) Report (ULR). Please fill out this form and return to our office within 10 days of receipt.

Mr. Allen Kanady
Omega Termite Control
807 75th Ave.
StID # 1650
August 23, 1996
Page 2.

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 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

enclosure

c: Ms. J. Anderson, All Environmental Inc., 3364 Mt. Diablo
Blvd., Lafayette, CA 94549

G. Coleman, files

wprq807

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Ro# 508

March 26, 1996
StID # 1650

Mr. Alan Kanady
Omega Termite Control
807 75th Ave.
Oakland CA 94621

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

**Re: Phase II Soil and Groundwater Investigation at 807 75th Ave.,
Oakland CA 94621**

Dear Mr. Kanady:

Our office has received and reviewed the March 17, 1997 Phase II report prepared by your consultant, All Environmental. This report details the advancement of six soil borings around the former gasoline tank pit at the above site. Both soil and grab groundwater samples were taken for chemical analysis. The results identified elevated levels of gasoline and BTEX (benzene, toluene, ethylbenzene and xylenes) constituents in soil and groundwater. Areas to the northwest and southeast of the tank pit detected elevated benzene in soil and were recommended for limited soil excavation by your consultant. All Environmental also recommended the installation of three monitoring wells to verify groundwater quality.

Our office agrees with the above recommendations, therefore, we request that you submit within 30 days or by April 28, 1997 a work plan to perform this work.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

c: B. Campbell, All Environmental, Inc., 3364 Mt. Diablo Blvd.
Lafayette, CA 94549

B. Chan, files

wp807-75

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0508

RAFAT A. SHAHID, Assistant Agency Director

July 26, 1993

Allen G. Kanady, Jr.
Christine M. Kanady
807 - 75th Ave.
Oakland, CA 94621

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

**Re: Underground Storage Tank(s) at 807 - 75th Ave., Oakland CA
94621**

Dear Property Owners:

An inspection conducted by Britt Johnson of this office on July 12, 1993 found that there are underground storage tanks at the above location. Our records indicate that these underground storage tanks have not been permitted.

In accordance with the California Code of Regulations, Title 23, Chapter 3, Subchapter 16 Underground Tank Regulations you must perform one of the following actions by September 6, 1993:

1. Submit a tank closure plan to this Department as required by Article 7, Section 2670, or
2. Apply for a permit to operate these tanks as required by Article 10, Section 2710.

Please note that section 25299 of the California Health and Safety Code states that any operator or owner of an underground storage tank is liable for a civil penalty of not less than five hundred dollars or more than five thousand dollars per day for failure to obtain a permit, or failing to properly close an underground storage tank, as required by section 25298.

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

Sincerely,

Paul Smith
Senior Hazardous Materials Specialist

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0508

May 16, 1991

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

Mr. Allen Kanady, President
Omega Pest Control
807-75th Avenue
Oakland CA 94621

Re: Notice of Violation - Omega Pest Control, 807-75th Ave., Oakland

Dear Mr. Kanady:

Thank you for sending the County the information concerning the disposal of waste oil, the precision testing of your underground tanks and completed A and B forms for the registering of your tanks. This information, in part, addresses those items listed in the County's initial Notice of Violation dated March 19, 1991. As requested in this initial letter you were to submit a written plan of correction addressing each item mentioned in that letter. The receipts and completed forms infer that the drums of waste oil have been removed for recycling, that the tanks have been tested and appear to be tight and that your intentions are to register the tanks for subsequent usage or temporary closure.

Please be advised you have still failed to address the following violations of Title 22 as listed in the initial Notice of Violation:

1. Section 66508- regarding proper labeling of containers.
2. Section 67243- regarding closure of containers containing hazardous waste.
3. Section 67245- regarding the need for secondary containment of containers.
4. Section 66471- requiring the generator to determine if the material he generates is hazardous or not. This applies to the two blue and the five unlabeled drums in the rear of your yard.

In addition, you have not addressed these violations of the California Health and Safety Code:

1. Section 25514- the requirement of businesses to submit a Hazardous Materials Management Plan for all hazardous materials handled at any one time of the year at quantities equal to or exceeding 55 gallons, 500 pounds or 200 cubic feet at STP.
2. Section 25299- states the requirements for operating or closing an underground tank. Please inform our office of your intentions regarding the underground tanks. Assuming you wish to permit the tanks, you will need to perform daily inventory reconciliation, submit quarterly monitoring reports, continue to perform annual precision tests and submit a written monitoring plan.

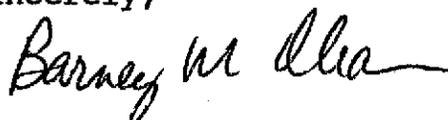
Mr. Allen Kanady
Omega Pest Control
May 16, 1991
Page 2.

Form B for registering each underground tank, was incorrectly filled out. Only information for one tank should be on each form. I have transcribed the information presented on the form you submitted onto two separate forms. Please review these forms, then sign and return them to our office.

Please provide a written plan of correction addressing those items listed above within 30 days of the date of this letter.

You may contact me at 271-4320 should you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

enclosures: B forms

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Edgar Howell, Chief, Hazardous Materials Division
H. Hatayama, DOHS

3-Omega

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0508

May 7, 1991
Certified Mailer:

Mr. Allen Kanady, President
Omega Pest Control
807-75th Ave.
Oakland CA 94621

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

Re: Omega Pest Control Inc, 807-75th Ave., Oakland 94621

SECOND NOTICE OF VIOLATION

Dear Mr. Kanady:

Following an inspection by Barney Chan of this office on February 13, 1991, you were sent a Notice of Violation listing those violations of the California Code of Regulations, Title 22, Division 4 (22CCR) and of the California Health and Safety Code, Division 20 (CH&SC). Among these violations of 22CCR included section 66508, improperly labeled drums, section 67243, an open drum containing hazardous material, section 66492, no copies of waste disposal manifests available for inspection and section 67245, no containment for waste oil drums.

The violations of CH&SC were 25124(4), non-labeling of drums which potentially contain hazardous material or waste, section 25514, lack of a Hazardous Materials Management Plan and section 25299, the failure to permit, register or properly close the underground tanks at your facility. You were requested per section 66328 of CCR, T22, to submit a plan of correction to our office within 30 days stating the actions Omega Pest Control Inc. will take to correct these violations. To this date we have not received your plan of correction. Please provide our office with your plan of correction within 15 days of receipt of this letter.

You are reminded that an operator or owner of an underground tank is subject to civil penalties of not less than \$500 or more than \$500 for each day which he violates those sections outlined in section 25299.

You may call me at 271-4320 should you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division

H. Hatayama, DOHS
Edgar Howell, Chief, Hazardous Material Division
Omega2NOV

JA

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0508

Certified Mailer: P 062 127 982

March 19, 1991

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

Mr. Allen Kanady, President
807-75th Ave.
Oakland CA 94621

Re: Omega Pest Control Inc., 807-75th Ave., Oakland 94621

NOTICE OF VIOLATION

Dear Mr. Kanady:

On February 13, 1991, Barney Chan, Hazardous Materials Specialist, from this office performed an inspection at the above property. During the inspection, a number of violations were noted of the California Code of Regulations, Title 22, Division 4 (22CCR) and of the California Health and Safety Code, Division 20 (CH&SC). The violations of 22CCR are:

1. Section 66508- Many containers at the facility were not properly labeled. This included the three 55 gallon drums used to contain waste oil. This may also include any of the blue unlabeled unidentified 55 gallon drums also in the rear of the yard. All waste containers must be labeled for contents, hazard class, name and address of generator and a start accumulation date. Hazardous waste must not be stored for more than 90 days.
2. Section 67243- Containers holding hazardous material must be closed unless adding or removing waste. One of the 55 gallon drums stored at the facility did not have their bungs in place. In addition, the drums had fluid accumulating on the top of the containers.
3. Section 66492- A generator shall keep a copy of each signed manifest for three years or until he receives a signed copy from the designated facility which received the waste. No copies of waste disposal manifests were available for waste oil and because of this, waste storage time limits may have been exceeded. You are requested to send copies of the past year's receipts, 3/90-present, of any waste disposal to our office.
4. Section 67245- Container storage areas shall have a containment system. It was noticed that the waste oil drums are sitting directly on the soil without any secondary containment.

Mr. Allen Kanady
Peralta Community College
March 19, 1991
Page 2.

Violations of the California Health and Safety Code :

1. Section 25124(4) defines a "waste" as material mislabeled or not adequately labeled, unless the material is labeled adequately within ten days after its discovery. Section 66471 of Title 22 CCR requires the generator to determine whether or not the waste he generates is hazardous. There are 5 unidentified drums in the rear of the yard. These drums appeared rusted and in poor condition. Unidentified drums must be verified to contain product, waste or hazardous waste. If determined to be hazardous, they must be handled accordingly.

2. Section 25514- Any business that violates Sections 25503.5 to 25505 is liable for civil fines. Section 25503.5(a) states the requirement for businesses which handle a hazardous material at one time during the year in quantities greater than or equal to 55 gallons, 500 pounds or 200 cubic feet at standard temperature and pressure to file a Hazardous Material Management Plan. A HMMP form was given to you for your submission.

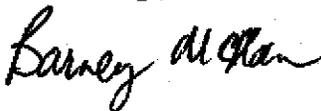
3. Section 25299- This section states that an operator of an underground tank is subject to a civil penalty of not less than \$500 or more than \$5000 for each day which he violates any of the requirements of the following:

- Operating an underground tank which has not been issued a permit.
- Failing to monitor the underground storage tank, as required by this permit.
- Failing to maintain records, as required by Section 25286.
- Failing to properly close an underground storage tank, as required by Section 25298.

In accordance with Section 66328 of CCR, T22 a plan of correction must be submitted to our office within 30 days. The plan should specify the actions Omega Pest Control Inc. will take to address the above violations.

If you have any questions concerning this letter, please contact the undersigned, at 271-4320.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Edgar Howell, Chief Hazardous Materials Division
Howard Hatayama, DOHS

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0508 ②

July 14, 1989

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

Mr. Jonathan E. Scheiner, Geologist
Environmental Solutions, Inc.
2820 Shadelands Dr., Suite 115
Walnut Creek, CA 94598

Dear Mr. Scheiner:

As requested, we have reviewed our files for the following locations. The files searched include Hazardous Waste Generator, Underground tanks, Prop. 65 and site mitigation.

The following information is presented per your request.

801 - 69th Ave.	Standard Iron & Metals	Inspected May 4, 1988 No record of soil contamination. No major violations of state law
920 - 66th Ave.	Commercial Pallat Co.	No record
887 - 71st Ave.	George E. Masker Inc.	Inspected Sept. 13, 1988 No record of soil contamination. No major violations of state law
(R0530) 814 - 69th Ave.	Silva Roofing Co.	No record
(R0508) 807 - 75th Ave.	Omega Pest Control	Inspected Nov. 5, 1987 No record of soil contamination. No major violations of state law
6825 San Leandro St.	East Bay Truck and Auto Repair	Inspected March 16, 1988 no record of soil contamination. No major violations of state law
7001 San Leandro St.	Cypress Steel	No record
7217 San Leandro St.	Blackman Lumber	No record
6815 San Leandro St.	Coliseum Redwood	No record

Mr. Jonathan E. Scheiner, Geologist
Environmental Solutions, Inc.
Walnut Creek, CA 94598
July 14, 1989
Page 2 of 2

This letter is limited to information, available to this department and does not reflect other information, which may be accessible to other agencies and businesses involved with these properties.

If you have any questions, please call Edgar Howell, Supervising Hazardous Materials Specialist at (415) 271-4320

Please find enclosed, a copy of the invoice sent to our Billing Unit, Alameda County Environmental Health Department.

Sincerely,

Rafat A. Shahid

Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:EH:mnc

Enclosures (1)

cc: Ed Howell
Files