DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway

Alameda, CA 94502-6577 (510) 567-6700

October 13, 1995 StID # 3657

Mr. Frank Cole R & A Trucking 865 77th Ave. Oakland CA 94621

Re: Request for Technical Information for R&A Trucking, 865 77th Ave., Oakland CA 94621

Dear Mr. Cole:

Although our office did agree to allow you to submit only the analytical data from the sampling of monitoring well MW-2 at the above site we have also previously requested information which has yet to be supplied to our office. I refer you to my March 23, 1995 letter. Please submit within 30 days or by November 17, 1995 the following information:

- Documentation as to the proper destruction of monitoring well MW-1;
- 2. The monitoring well installation report for MW-2; and,
- 3. The report for the installation of boring SP-5.

In reference to your October 11, 1995 letter, please be aware that the September 1995 sampling of MW-2 represents the second quarterly monitoring event and at least two additional samplings will be required, not one as you indicated in the letter.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

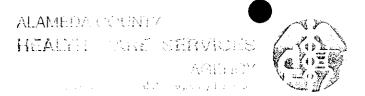
cc: D. Robinson, AB&I, 7825 San Leandro St., Oakland 94621

M. Cline, BSK & Assoc., 1181 Quarry Lane, Bld 300, Pleasanton CA, 94566

G. Coleman, files

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HAPAT A. SHALIEL, Automotive Agency Director

March 30, 1995 StID # 3657 •

Mr. Frank Cole R&A Trucking 865 77th Ave. Oakland CA 94621 DEPARTMENT OF ENVIRONMENTAL HEALTH

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

Re: Revision to Work Plan Dated August 19, 1994 from BSK & Associates for 865 77th Ave., Oakland CA 94621

Dear Mr. Cole:

Our office has received the revised work plan dated March 24, 1995 for the installation of a monitoring well within 5 feet of SP-5. This well, MW-2, will replace MW-1 which will be destroyed. As stated in my March 23, 1995 letter, this work plan is acceptable. Additionally, I understand that the report which documents the installation of this well will also include the documentation of the advancement of boring SP-5.

Please contact me 48 working hours prior to well installation, 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

Borner M Che

Hazardous Materials Specialist

CC: Mr. D. Robinson, AB&I, 7825 San Leandro St., Oakland 94621
Mr. A. Eskandari, BSK & Associates, 1181 Quarry Lane, Bld 300
Pleasanton, CA 94568

A. Levi, files 4wpad867

DAVID J. KEARS, Agency Director



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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

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

March 23, 1995 StID # 3657

Mr. Frank Cole R & A Trucking 865 77th Ave. Oakland CA 94621

Re: Summary of March 13, 1995 Meeting with Mr. Dave Robinson Regarding R & A Trucking, 865 77th Ave., Oakland 94621

Dear Mr. Cole:

This letter serves to summarize the items discussed with Mr. Robinson during our March 13, 1995 meeting at the County's office. Mr. Robinson representing you, and myself discussed the results of the additional overexcavation at the site and the more recent offsite boring results. It appears that with the exception of northern side of the overexcavation, the gasoline and BTEX contamination appears to have been removed to low to non-detectable concentrations. Additionally, our office was informed verbally that soil and groundwater samples from the offsite boring along north side of 75th Ave. were also non-detectable for gasoline and BTEX. Please submit a copy of the report for this work within 30 days or by April 24, 1995.

We also discussed what additional investigation is required for this site. It was agreed that the existing monitoring well should be destroyed and another monitoring well installed in the same general location of the above-mentioned boring. Should gasoline and BTEX concentrations be non-detectable in groundwater from this well for four consecutive quarters, our office will consider recommendation for site closure.

Prior to site closure, Mr. Robinson was reminded that both soil and groundwater disposition will be required.

In lieu of quarterly groundwater reports, I am willing to accept copies of the laboratory analytical report along with the chain of custody document for each sampling event. This is acceptable until which time the site is being recommended for site closure. A summary report signed by your registered consultant will be required at that time.

Please submit a modified work plan for the installation of one off-site monitoring well within 30 days or by April 24, 1995.

Mr. Frank Cole R & A Trucking 865 77th Ave. March 23, 1995 Page 2.

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

Barney M. Chan

Hazardous Materials Specialist

cc: D. Robinson, AB&I, 7825 San Leandro St., Oakland 94621

M. Cline, BSK & Associates, 1181 Quarry Lane, Building 300, Pleasanton, CA 94566

C. Gordon, SWRCB Cleanup Fund, 2014 T St., Suite 130, P. O. Box 944212, Sacramento, CA 94244-2120

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DAVID J. KEARS, Agency Director



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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY **DEPARTMENT OF ENVIRONMENTAL HEALTH** 1131 HARBOR BAY PARKWAY, 2ND FLOOR ALAMEDA, CA. 94502-6577

October 27, 1994 StID# 3657

Mr. Frank Cole R & A Trucking 865 77th Ave. Oakland CA 94621

Re: Comment on August 19, 1994 Work Plan for 865 77th Ave., R & A Trucking Facility

Dear Mr. Cole:

Our office has received and reviewed the above referenced work plan as prepared by BSK & Associates. We have also discussed its contents recently with Mr. Dave Robinson of AB &I. Recall, this work plan calls for the destruction of the existing monitoring well and its replacement on the south side of 75th Ave. after overexcavation and the sampling of a temporary well point on the north side of 75th Ave. I understand that you will be implementing the work plan either late this month or early next month. Please inform me at least 48 hours prior to any field work so I may arrange to be on-site if possible.

The work plan is acceptable, however, our office has the following comments/requirements:

- 1. Please provide, with your next quarterly monitoring report, copies of the analyses of soil samples representing the soil used to backfill the original pit and the overexcavated pit. What was the total volume of the reused soil?
- 2. Please contact the Alameda County Flood Control & Water Conservation District, Zone 7, to verify their requirements for the proper closing a monitoring well.
- 3. Confirmation soil sampling at a rate of one soil sample per every 20 linear feet should be taken of the overexcavated pit. What will be done with the excavated soil?

Please address these items prior to initiating your field work.

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

Mr. Frank Cole StID # 3657 865 77th Ave. October 27, 1994 Page 2.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

cc: D. Robinson, AB&I, 7825 San Leandro St., Oakland 94621

T. Berger, BSK & Associates, 1181 Quarry Lane, Bld 300,

Pleasanton, CA 94566

E. Howell, files

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HEALTH CARE SERVICES

AGENCY

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RAFAT A. SHAHID, Assistant Agency Director

DAVID J. KEARS, Agency Director
July 15, 1994 StID # 3657

Mr. Frank Cole R & A Trucking 865 77th Ave. Oakland CA 94621

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

NOTICE OF VIOLATION

RE: Request for a Work Plan for Further Subsurface Investigation for R&A Trucking Facility at 865 77th Ave., Oakland CA 9a4621

Dear Mr. Cole:

Our office has received and reviewed the June 30, 1994 Quarterly Groundwater Report as prepared by your consultant, BSK and This report gives the analytical results of the June Associates. 10, 1994 sampling event for the monitoring well at the above site. Although our office is lacking all analytical results of prior samplings, the results of this monitoring are consistent with those we do have. The results indicate significant groundwater contamination particularly of the compound benzene beneath this site.

Recall, our office last wrote to you in our April 11, 1994 letter commenting on the March 1994 soil and groundwater investigation also performed by BSK & Associates. In this letter, you were requested in install an additional monitoring well to determine the limits of the groundwater contamination. You were also asked to provide your next phase of investigation for this site along with your next groundwater monitoring report. This was not provided with your June 30, 1994 report. Please provide a work plan addendum to install at least one additional well. You should also evaluate what remedial alternative will be used at this site to remediate the existing groundwater contamination.

Please provide your work plan addendum and remedial alternative within 30 days or by August 19, 1994. Please be advised that our office has recently moved to: 1131 Harbor Bay Parkway, Room 250, Alameda CA 94502

Until our phone system is up and running, you may contact me at (510) 337-2864.

Sincerely, Duney M. Che

Barney M. Chan, Hazardous Materials Specialist

cc: D. Robinson, AB & I, 7825 San Leandro St., Oakland CA 94621

T. Berger, BSK & Associates, 1181 Quarry Lane, Bld 300,

Pleasanton, CA 94566

E. Howell, files NOV865

April 11, 1994

StID # 3657

DAVID J. KEARS, Agency Director

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(510) 271-4530

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621

Mr. Frank Cole R & A Trucking Co.

865 77th Ave. Oakland CA 94621

Re: Comment on March 1994 Shallow Soil and Groundwater Assessment for R & A Trucking Facility, 865 77th Ave., Oakland CA 94621

Dear Mr. Cole:

Our office has received and reviewed the above referenced report as prepared by your consultant, BSK & Associates. This report documents the installation of four soil borings and the analysis of a soil and groundwater sample from each boring. The results indicate that groundwater contamination has migrated in the assumed downgradient direction and is detectable in boring SP-3. Soil contamination, on the other hand, has not apparently gone as far as SP-3.

Because you are required to determine the extent of the soil and groundwater contamination, it appears that an additional monitoring well will be required further downgradient to boring For recommendation of site closure, four quarters of nondetectable concentrations is generally required in the well(s) which define the zero contaminant boundary. In order to achieve this requirement, BSK recommends the excavation of contaminated soils in the immediate area of MW-1. This well has detected elevated gasoline and benzene concentrations since its installation. Removal of this well may be necessary unless you decide to initiate remediation from this well. The excavation approach is acceptable. If you wish to proceed with their recommendations, please provide an appropriate work plan to excavate soils near MW-1 and install an additional or replacement monitoring well. If you wish to initiate remediation from this well, please provide an alternative approach.

In any event, as long as a monitoring well exists at this site, you are required to sample and analyze the well on a quarterly basis. Please provide your next phase of investigation along with your first quarter 1994 monitoring report.

Mr. Frank Cole StID # 3657 865 77th Ave. April 11, 1994 Page 2.

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

Sincerely,

Barney M. Chan

Barney us Che

Hazardous Materials Specialist

cc: D. Robinson, AB&I, 7825 San Leandro St., Oakland CA 94621

T. Berger, BSK & Associates, 1181 Quarry Lane, Bld 300 Pleasanton, CA 94566

E. Howell, files

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AGENCY

DAVID J. KEARS, Agency Director

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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

March 9, 1994 StID # 3657

Mr. Frank Cole R&A Trucking Co 865 77th Ave Oakland CA 94621

Re: Comment on October 1993 Work Plan for Soil and Water Assessment at 865 77th Ave., Oakland 94621

Dear Mr. Cole:

Upon review of the above work plan, our office approves of the approach to install four hydropunch borings to determine the extent of soil and groundwater contamination with the following comments/conditions:

- 1. Please run any screened soil sample exhibiting greater than 100 ppm on your field instrument in a certified laboratory. This is in addition to the soil sample from the soil/groundwater interface.
- 2. You are reminded that quarterly monitoring reports and reports in general are required to be submitted to our office within 45 days of the field activity. We have only recently received the results of the 8/93 and 12/93 groundwater sampling event. Your next sampling event should occur this month. You must also include a copy of the chain of custody document and a signed copy of the original analytical report including any quality control data along with each quarterly report. This means that a report for the work being performed today, 3/9/94, should be sent to our office by April 24, 1994. You should also include the results of this month's quarterly sampling event.
- 4. You are also reminded that additional monitoring wells will be required to delineate the extent of groundwater contamination. Your next step should be the provision of a work plan for the installation of these additional wells based on the results of the hydropunch borings. An area of concern is the northwest corner of the site, where no soil or groundwater data currently exists. A monitoring well or boring in this general location will be required. Please provide a work plan for the additional monitoring well installations to our office by May 10, 1994.

Mr. Frank Cole StID # 3657 865 77th Ave. March 9, 1994 Page 2.

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

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

Sincerely,

Barney Chan

Hazardous Materials Specialist

CC: T. Berger, BSK Associates, 1181 Quarry Lane, Bld 300 Pleasanton, CA 94566

D. Robinson, AB&I, 7825 San Leandro St., Oakland 94621

E. Howell, files

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DAVID J. KEARS, Agency Director

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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH State Water Resources Control Board Division of Clean Water Programs UST Local Oversight Program 80 Swan Way, Rm 200 Oakland, CA 94621

(510) 271-4530

StID #3657 August 24, 1993

Mr. Frank Cole R & A Trucking Co. 865 77th Ave Oakland CA 94621

Re: Comment on December 1992 Report of Monitoring Well Installation at R & A Trucking, 865 77th Ave., Oakland, CA 94621

Dear Mr. Cole:

Thank you for the submittal of the above referenced report as prepared by BSK & Associates. Our office received the report on August 18, 1993 and has just completed our review. You should be reminded that until further notice, you are required to sample and analyze the groundwater from the monitoring well on a quarterly basis ie every three months. A groundwater monitoring report should be sent to our office within 45 days of each monitoring event. Your next monitoring event should be 9/1/93 and hopefully you have already sampled the 3/93 and 6/93 events.

The results of the report indicate that there is residual soil and groundwater contamination at this site. The soil sample from 7 feet depth found 370 parts per million (ppm) TPH as gasoline and the groundwater sampling reported 1270 ppb benzene and 7600 ppb TPH as gasoline. As recommended in this report, the extent of soil and groundwater must be determined. Please contact your consultant so as to provide a method to determine the extent of contamination. You should provide this information to our office within 60 days or by October 25, 1993.

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

Sincerely,

Barney M. Chan

Barney M Cha

Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office

D. Robinson, AB&I, 7825 San Leandro St., Oakland 94621

T. Berger, BSK & Associates, 1181 Quarry Lane, Bld 300 Pleasanton, CA 94566

E. Howell, files

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AGENCY

DAVID J. KEARS, Agency Director



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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

August 6, 1993 StID # 3657

Mr. Frank Cole R and A Trucking Co. 865 77th Ave. Oakland, CA 94621

Re: Request for Technical Report for Monitoring Well Installation and Quarterly Monitoring for R & A Trucking, 865 77th Ave., Oakland CA 94621

Dear Mr. Cole:

In regards to the investigation of the gasoline tank removal on 1/24/91 from the above location, our office last corresponded to you in my October 15, 1992 letter conditionally approving the May 6, 1992 work plan for monitoring well installation provided Dave Robinson and BSK & Associates. Through conversation with BSK & Associates, I am aware that the monitoring well has been installed though I have yet to receive a report detailing the well's installation or any subsequent sampling results.

Please be aware that Title 23 of the California Code of Regulations, Chapter 16, Section 2652 11 (d) requires that until the investigation and cleanup are complete, the owner or operator shall submit reports to the local agency every three months, or at a more frequent interval as specified by the local agency. In addition, the California Health and Safety Code, Chapter 6.7, Section 25298(c) (4) states that no person shall close an underground tank system unless the person demonstrates to the appropriate agency that the site has been investigated to determine if there were any present or past releases, and if so, that the appropriate corrective actions were taken. Civil penalty of up to \$5000/day per each tank which is improperly closed exist.

Please provide the monitoring well installation report, any additional technical reports, along with a schedule for next quarter's actions to our office within 30 days or by September 10, 1993.

Mr. Frank Cole R & A Trucking StID #3657 865 77th Ave. August 6, 1993 Page 2.

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

Sincerely,

Barney M. Chan

Hazardous Material Specialist

cc: G. Jensen, Alameda County District Attorney Office

D. Robinson, AB&I, 7825 San Leandro St., Oakland 94621

T. Berger, BSK & Associates, 1181 Quarry Lane, Bld. 300, Pleasanton, CA 94566

E. Howell, files

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AGENCY DAVID J. KEARS, Agency Director



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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

August 6, 1993 StID # 3657

Mr. Frank Cole R and A Trucking Co. 865 77th Ave. Oakland, CA 94621

Re: Request for Technical Report for Monitoring Well Installation and Quarterly Monitoring for R & A Trucking, 865 77th Ave., Oakland CA 94621

Dear Mr. Cole:

In regards to the investigation of the gasoline tank removal on 1/24/91 from the above location, our office last corresponded to you in my October 15, 1992 letter conditionally approving the May 6, 1992 work plan for monitoring well installation provided Dave Robinson and BSK & Associates. Through conversation with BSK & Associates, I am aware that the monitoring well has been installed though I have yet to receive a report detailing the well's installation or any subsequent sampling results.

Please be aware that Title 23 of the California Code of Regulations, Chapter 16, Section 2652 11 (d) requires that until the investigation and cleanup are complete, the owner or operator shall submit reports to the local agency every three months, or at a more frequent interval as specified by the local agency. In addition, the California Health and Safety Code, Chapter 6.7, Section 25298(c) (4) states that no person shall close an underground tank system unless the person demonstrates to the appropriate agency that the site has been investigated to determine if there were any present or past releases, and if so, that the appropriate corrective actions were taken. Civil penalty of up to \$5000/day per each tank which is improperly closed exist.

Please provide the monitoring well installation report, any additional technical reports, along with a schedule for next quarter's actions to our office within 30 days or by September 10, 1993.

Mr. Frank Cole R & A Trucking StID #3657 865 77th Ave. August 6, 1993 Page 2.

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

Sincerely,

Barney M. Chan

Hazardous Material Specialist

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cc: G. Jensen, Alameda County District Attorney Office

D. Robinson, AB&I, 7825 San Leandro St., Oakland 94621

T. Berger, BSK & Associates, 1181 Quarry Lane, Bld. 300, Pleasanton, CA 94566

E. Howell, files

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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

October 15, 1992 STID # 3657

DAVID J. KEARS, Agency Director

Mr. Frank Cole R & A Trucking Co. 865-77th Ave. Oakland CA 94621 DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

Re: Plan for the Installation of One Monitoring Well at R&A Trucking, 865-77th Ave., Oakland CA 94621

Dear Mr. Cole:

I have received and reviewed the May 6, 1992 report calling for the installation of one monitoring well in the verified downgradient relative to the former underground tank at the above site. The information provided is acceptable in establishing the assumed gradient therefore the location of the proposed monitoring well is acceptable to our office.

Please be aware that the weekly and monthly observations of the monitoring well, as stated in BSK's proposal, is **not required** when only one well is being installed. The logic behind monthly observations is to get better information on groundwater gradient, which is not possible with only one monitoring well. Quarterly monitoring should be performed and a minimum of five sampling events with non-detectable hydrocarbons concentrations will be required prior to recommendation for site closure. Although not stated in the proposal, be aware that normal screening of the monitoring well is five feet above and ten feet into the first encountered groundwater.

You should proceed with the monitoring well installation immediately. Please inform this office 48 working hours in advance of this work in the event we would like to witness this activity.

You may contact me at (510) 271-4350 should you have any questions.

Sincerely,

Barney M. Chan, Hazardous Materials Specialist

cc: M . Thomson, Alameda County District Attorney Office

R. Hiett, RWQCB

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- D. Robinson, AB&I, 7825 San Leandro St., Oakland, CA 94621
- T. Berger, BSK & Associates, 1181 Quarry Lane, Blding 300, Pleasanton, CA 94566
- E. Howell, files WP-865-77

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

December 3, 1991

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

Mr. Frank Cole Executive Vice-President R & A Trucking Co. 865- 77th Avenue, Oakland, CA 94621

Re: Work Plan for Subsurface Investigation at R&A Trucking Co., 865-77th Ave., Oakland, CA 94621

Dear Mr. Cole:

Our division has received and reviewed the work plan to investigate potential subsurface contamination at the above referenced site. This work plan was provided to us by Mr. Dave Robinson, of American Brass and Iron Foundry. The proposal for overexcavation and resampling is a good first step. Please note that in the event that ground water is not present in the pit, you should take soil samples at the base of the pit. Additional samples may be required if the subsurface soils indicate contamination or the likelihood of contamination. The County will allow you to perform subsurface soil investigation prior to the installation of monitoring well(s). With these items in mind you may proceed with your initial investigation.

You may contact me at (510) 271-4320 should you have any questions.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office

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Barney U Cho

D. Robinson, A B & I, 7825 San Leandro St., Oakland 94621

R&ATruckWP



Telephone Number: (415)

October 17, 1991

Mr. Frank Cole R and A Trucking Company 865 77th Ave. Oakland CA 94621

Re: Request for a Work Plan to Address the Unauthorized Fuel Release at 865 77th Ave., Oakland dba R and A Trucking Co.

Dear Mr. Cole:

The Alameda County Environmental Health, Hazardous Materials Division has received analytical results from soil samples taken subsequent to the 1000 gallon gasoline tank removal from the above site. These results were provided to our division by Tank Protect Engineering. These results indicate that there was 1,800 and 760 mg/kg (ppm) of Total Petroleum Hydrocarbons in the Low/Medium Boiling Point range, in samples SS-1 and SN-1, respectively. Detectable amounts of benzene, toluene, ethyl benzene and xylenes (BTEX) were also found in these samples. This division uses the Tri-Regional Board Guidelines for the Evaluation of Underground Tank Sites for its guidance. This document states that when 100 ppm of Total Petroleum Hydrocarbons are detected in soil samples taken from bottom of the excavation pit at an underground tank removal, a soil/ground water investigation is warranted.

Therefore, because of these analytical results, this site is considered to have experienced an unauthorized petroleum hydrocarbon release which has impacted the soil and potentially the ground water. The extent of this contamination must be determined and remediated. In order to do this, you are requested to submit a work plan within thirty (30) days which addresses this problem. Enclosed please find the contents of a "typical" work plan for you to use as guidance.

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and the Regional Water Quality Control Board (RWQCB) to the attention of Mr. Eddy So. Their address is: 2101 Webster St., 4th Floor, Oakland, CA 94612. Please be aware that this is a formal request for technical reports pursuant to the California Water Code, Section 13267 (b). Any extensions of agreed upon time deadlines must be confirmed in writing by this Division or the RWQCB.

Mr. Frank Cole 865 77th Ave., R and A Trucking October 17, 1991 Page 2.

Please contact me at (510) 271-4320 should you have any questions regarding this letter.

Sincerely,

Barney M. Chan

Barney W Cha-

Hazardous Materials Specialist

enclosures

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

E. So, RWQCB

H. Hatayama, DOHS

D. Robinson, AB and I, 7825 San Leandro St., Oakland CA 94621

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Below lists the contents of a "typical" workplan as requested for after an unauthorized petroleum fuel release is observed.

Our office will be the lead agency overseeing both the soil and groundwater remediation of this site. The Regional Water Quality Control Board (RWQCB) is currently unable to oversee the large number of contamination cases within Alameda County and has delegated the handling of this case to our Division. We will be in contact with the RWQCB in order to provide you with guidance concerning the RWQCB's remediation requirements. However, please be aware that you are responsible for diligent actions to protect waters of the State.

To complete contaminant assessment and begin any possible remediation, we require that you submit a work plan which, at a minimum, addresses the items listed below and presents a timetable for their completion. Please submit this workplan within 30 days of the date of this letter.

I. Introduction

- A. Statement of scope of work
- B. Site map showing location of existing and past underground storage tanks and associated piping
- C. Site History - provide historical site use and ownership information. Include a description of types and locations of hazardous materials used on site.

II. Site Description

- A. Vicinity description including hydrogeologic setting
- B. Initial soil contamination and excavation results
 - provide sampling procedures used
 - indicate depth to ground water
 - describe soil strata encountered
 - provide soil sampling results, chain of custody forms, identity of sampler
 - describe methods for storing and disposal of all soils

III. Plan for determining extent of soil contamination on site

- A. Describe approach to determine extent of lateral and vertical contamination
 - identify subcontractors, if any
 - identify methods or techniques used for analysis
 - provide sampling map showing all lines of excavation and sampling points
 - if a step out procedure is used, define action level for determination of "clean" isopleth
 - provide chain of custody forms, lab analysis results, all receipts and manifests, & identity of sampler

Typical Workplan Page 2.

Plan for determining extent of soil contamination on site.

- B. Describe method and criteria for screening clean versus contaminated soil. If onsite soil aeration/bioremediation is to be utilized, then provide a complete description of method that includes:
 - volume and rate of aeration/turning
 - method of containment and cover
 - wet weather contingency plans
 - permits obtained
- C. Describe security measures
- IV. Plan for determining ground water contamination
 - Construction and placement of wells should adhere to the requirements of the "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks". Provide a description of placement and rationale for the location of monitoring wells including a map to scale.
 - The placement and number of wells must be able to determine the extent and magnitude of the free product and dissolved product plumes.
 - A. Drilling method for construction of monitoring wells
 - expected depth and diameter of monitoring wells
 - date of expected drilling
 - casing type, diameter, screen interval, and pack and slot sizing techniques
 - depth and type of seal
 - development method and criteria for adequacy of development
 - plans for cuttings and development water
 - B. Ground water sampling plan
 - method for free product measurement, observation of sheen
 - well purging procedures
 - sample collection procedures
 - chain of custody procedures
 - procedures for determining ground water gradient

Typical Workplan Page 3.

Plan for determining groundwater contamination.

- C. Sampling schedule
 - measure free product weekly for first month following well installation
 - measure free product and dissolved constituents monthly for first three months.
 - after first three months monitor quarterly.
 - monitoring must occur a minimum of one year.
- V. Provide a site safety plan
- VI Development of a Remediation Plan.
 - A. The Remediation Plan is to include a time schedule for remediation, and, at minimum, must address the following issues:
 - removal of all free product. Manual bailing is not acceptable as a recovery system. Actual amount of free product removed must be monitored and tabulated.
 - remediation of contaminated soils and dissolved constituents must follow RWQCB's resolution No. 68-16.
 - soils containing 1,000+ ppm of hydrocarbons must be remediated. Soils containing between 100 and 1,000 ppm must be remediated unless sufficient evidence is provided which indicates no adverse effects on groundwater will occur. Clean up of soils to 100 ppm is strongly recommended.
 - design of remedial action system should be based on a review of hydrogeologic and water quality data and on an evaluation of mitigation alternatives. The determination of probable capture zone(s) of extraction system(s) should be based on aquifer characteristics as determined by aquifer test data

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VII Reporting

- A. Technical reports should be submitted with a cover letter from your company. The letter must be signed by an authorized representative.
- B. Monthly reports must be submitted for the next three months with the first report due 90 days from the above letter date.
- C. Quarterly reports must be submitted with the first report due 90 days after the final monthly report. These reports should describe the status of the investigation and cleanup.
- D. All reports and proposals must be signed by a California-Certified Engineering Geologist, California Registered Geologist or a California-Registered Civil Engineer (see page 2, 2 June 1988 RWQCB document). A statement of qualifications should be included in all reports. Initial tank removal and soil sampling does not require such expertise; however, borehole and monitoring well installation and logging, and impact assessments do require such a professional.