

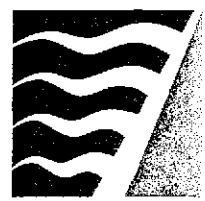
20129

RECEIVED

JUN 18 2007

ENVIRONMENTAL HEALTH SERVICES

13 June 2007



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

Billy Wu
270 13th Street
Oakland, CA 94612

Application Number: 15567
Plant Number: 18179
Equipment Location: Douglas Parking Company
1721 Webster Street
Oakland, CA 94612

ALAMEDA COUNTY
Tom Bates
Scott Haggerty
Janet Lockhart
Nate Miley

Dear Mr. Wu:

CONTRA COSTA COUNTY
John Gioia
Mark Ross
(Chair)
Michael Shimansky
Gayle B. Uilkema

This letter responds to your comments regarding the Public Notice issued 24 April 2007 for the above referenced application. I understand that you are the President of a Chinese Residence Association, and your membership has had difficulty understanding the Public Notice. The Public Notice is triggered by nearby schools and this determines what translations of the notice are performed. The schools involved only required translation into Spanish. Nevertheless, to aid you in explaining the system to your membership, I have enclosed a Chinese Translation of a Public Notice for a similar system permitted last year.

MARIN COUNTY
Harold C. Brown, Jr.

NAPA COUNTY
Brad Wagenknecht

The current system is being installed to remediate contaminated soil and groundwater that may be migrating off site. Underground Storage Tanks were removed from the site in 1992, and subsurface investigations have been conducted at the site since that time under the direction of the Alameda County Environmental Health Department (ACEHD). The ACEHD has approved operation of a Soil Vapor Extraction System to remediate the residual subsurface impacts to soil and groundwater.

SAN FRANCISCO COUNTY
Chris Daly
Jake McGoldrick
Gavin Newsom

SAN MATEO COUNTY
Jerry Hill
(Vice-Chair)
Carol Klatt

This technology will result in emissions of pollutants into the atmosphere, and so requires a permit from the Bay Area Air Quality Management District. On behalf of Mr. Douglas, Pangea Environmental Services has applied for an Authority to Construct/Permit to Operate the SVE system. Prior to issuing the Permit, BAAQMD prepared the Public Notice in compliance with BAAQMD regulations and the California Health and Safety Code.

SANTA CLARA COUNTY
Erin Garner
Yoriko Kishimoto
Liz Kniss
Patrick Kwok

SOLANO COUNTY
John F. Silva

The reason for preparing the notice is that there is a School located within 1,000 feet of the proposed source. Both the California Health and Safety Code and BAAQMD Regulations require that a notice be prepared in this instance. As long as the source emits a toxic air contaminant and is located within 1,000 feet of a School, the notice must be prepared, no matter how small the emissions. Emissions from the proposed source will be significantly controlled; however, it is not possible to control the source such that emissions are zero.

SONOMA COUNTY
Tim Smith
Pamela Torliatt
(Secretary)

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

In evaluating the risks due to proposed sources, the BAAQMD takes very conservative assumptions, often called "worst-case assumptions". This is done to assure ourselves, the applicant, and any interested member of the public that the source in question does not cause an unreasonable risk or undue harm. In the case of the proposed system, the risk that we calculated is well below a reasonable level of concern.

Save the Air

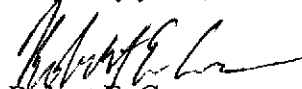


ROBERT CAVE
Air Quality Engineer

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
939 Ellis Street • San Francisco, California 94109
(415) 749-5048 • Fax (415) 749-5030

For more information regarding the history of the site, purpose, schedule, driving forces, and procedures for operation of the system, you may want to contact Donna Drogos of the ACEHD at (510) 567-6700, reference ACEHD file #4070. Alternatively you can contact Greg Bently of Pangea Environmental Services at (510) 836-3702. Your comments have become part of the public record for this proposed source. If you have any more questions, please call me at (415) 749-5048.

Very truly yours,



Robert E. Cave
Air Quality Engineer II

REC:rkt
Enclosures

R0129

Hwang, Don, Env. Health

From: Bob Clark-Riddell [BRiddell@pangeaenv.com]
Sent: Tuesday, June 27, 2006 2:48 PM
To: Hwang, Don, Env. Health
Subject: 1721 Webster, Oakland, CA StID#4070

Don,

This email is to inform you that Douglas Parking Company has retained Pangea Environmental Services, Inc., to provide environmental consulting services for the subject site.

Pangea is also hereby requesting your approval for inclusion of wells AS-1, AS-2 and AS-3 into the groundwater monitoring program. Sampling of these wells will provide additional vertical delineation of site groundwater, including before, during and after implementation of the approved SVE/AS system. As requested by your April 1, 2005 letter, Pangea will analyze all groundwater samples for the lead scavengers and additional fuel oxygenates specified in your letter.

Please provide your written concurrence for our records. Thank you.

Bob Clark-Riddell, P.E.
Principal Engineer
Pangea Environmental Services, Inc.
1710 Franklin Street, Suite 200
Oakland, CA 94612
510.435.8664 phone
510.836.3709 fascimile
briddell@pangeaenv.com
www.pangeaenv.com

7/3/2006



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

公告

2006年9月19日

公告對象： 在下列學校註冊的兒童的家長或監護人：

Lincoln Elementary School, Oakland
Lighthouse Community Charter School, Oakland

位於離下列提議中的新建或改建空氣污染源 1,000 英尺範圍內的所有居民及商戶。

公告單位： 灣區空氣質素管理局

公告事由： 下列空氣污染源的許可證申請#14611：

土壤蒸汽抽取系統
地下水處理系統
Vic's Automotive
245 8th Street, Oakland, CA 94607

灣區空氣質素管理局（「本局」）是監管工廠、工業場地及加油站等固定空氣污染源的地方機構。

每當我們收到在離學校場地 1,000 英尺範圍內新建或改建有毒空氣污染源的許可證申請時，加州法律規定我們要通知公眾。依照該規定，我們向在離提議中的污染源 1/4 英里範圍內的學校註冊的學生家長或監護人以及 1,000 英尺範圍內的所有居民及商戶分發或郵寄公告。

閣下收到此公告是因為本局收到了有關上述空氣污染源的許可證申請。提議中的項目說明如下：

為了補救現有的污染問題，已提議對該場地使用雙相抽取系統。該汽車服務站的地下儲油罐將汽油滲漏進週圍土壤中，污染了土壤及地下水。這些儲油罐已從該場地拆除。AEI Consultants 已代表 Vic's Automotive 提議採用一種系統，在該場地打井，將受到污染的地下水及石油蒸汽抽取出來。用空氣吸提器（一種讓空氣起泡通過地下水的設備）清除地下水中的有機污染物。用熱氧化器、催化氧化器或兩台串聯配置的碳吸收器對直接從土壤中抽取出來和從空氣吸提器中出來的蒸汽進行處理。

本局裁定，提議中的污染源所排放的有毒空氣污染物對於健康危害的增加是在可以接受的程度內，該項目將遵守有關空氣污染控制的所有其他有關規定。因此，本局計劃對提議中的項目簽發運行許可證。

如果閣下有興趣了解本局對該提議中的項目所作評估的詳情，閣下可以撥打列在本公告最後的電話號碼致電本局，索取有關的職員報告副本。該資料也可以在本局的網站上查閱或下載：

http://www.baaqmd.gov/pmt/public_notices/2006/index.htm

公眾意見徵詢期

公眾有 30 天時間對本提議做出回應。如果閣下希望對提議中的項目發表意見，閣下可以用書面或電郵方式。此外，閣下也可以打電話留言，長度不超過一分鐘。請留下閣下的姓名及電話號碼，以便本局職員可以對閣下的留言做出回應。

如果閣下希望對提議中的項目發表意見，請使用下列聯絡方式：

郵寄地址： Vic's Automotive Public Notice Response
BAAQMD
Engineering Division
939 Ellis Street
San Francisco, CA 94109
Attn:Robert Cave

電郵地址： rcave@baaqmd.gov

電話號碼： (415) 749-5040

本項目的公眾意見徵詢期將於 2006 年 10 月 18 日結束。

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



7

April 1, 2005

Lee Douglas
Douglas Parking
1721 Webster Street
Oakland, CA 94612-3411

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

Dear Mr. Douglas:

Subject: Fuel Leak Case No. ~~94612-3411~~ 129, Douglas Parking, 1721 Webster Street,
Oakland, CA 94612-3411

Alameda County Environmental Health (ACEH) staff has reviewed "Feasibility Test Report" dated April 22, 2004 by Cambria Environmental Technology. Cambria conducted a soil vapor extraction (SVE) / air sparge (AS) feasibility test on October 4, 2003, recommending that a SVE/AS remediation system be used to remediate the remaining hydrocarbons in soil and groundwater. We concur with the recommendation. However, we have not received the information previously requested by our letter dated September 23, 2003. We request that you perform the work, address the following technical comments, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. Site Characterization – 16,000 micrograms/liter (ug/l) Total Petroleum Hydrocarbons-Gasoline (TPH-G), 20,000 ug/l TPH-G, and 16,000 ug/l TPH-G, were detected in soil borings, SB-A, SB-B, and SB-C, respectively, located east of the former underground tanks, on February 22, 1996. East of these borings, grab groundwater samples, HP-1 and HP-2, detected 18,000 ug/l and 46 ug/l benzene, respectively, on March 19, 1993. "Response to Agency Letter" dated April 23, 2004 by Cambria stated that TPH-G grab groundwater concentrations for HP-1 and HP-2, were 200,000 ug/l and 42,000 ug/l, respectively, and the samples were collected at depths between 20.5 to 24.5 ft bgs. (The borings were not logged.) Thus, the plume needs to be further defined. Please propose sampling to define the lateral and vertical extent of groundwater contamination in the Work Plan requested below.
2. Preferential Pathway Survey – We do not have "Conduit Study and File Review Report" dated August 8, 2000 by Cambria. Please submit.
3. Well Survey – Locate wells within a quarter mile radius of the site. Show the location of the wells and the site on a map and tabulate well construction details for each well. Please submit.

4. Groundwater Analyses – We request that you include the other fuel oxygenates Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), and Tertiary Butyl Alcohol (TBA), Ethanol by EPA Method 8260 and the lead scavengers, Ethylene Dibromide (EDB), Ethylene Dichloride (EDC) for analyses of grab and monitoring well groundwater samples, and for the lead scavengers, EDB and EDC, also perform analyses on soil samples. If any of the latter compounds are detected, and are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan.
5. SVE/AS remediation system - Please prepare system design plans and submit.

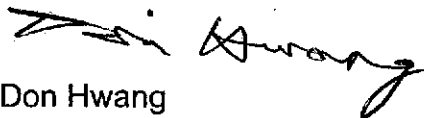
TECHNICAL REPORT REQUEST

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

- June 1, 2005 - Work Plan
- June 1, 2005 - Preferential Pathway Survey
- June 1, 2005 - Well Survey
- June 1, 2005 - SVE/AS System design plans
- July 31, 2005 - Groundwater Monitoring Report, Second Quarter 2005
- October 31, 2005 - Groundwater Monitoring Report, Third Quarter 2005
- January 31, 2006 - Groundwater Monitoring Report, Fourth Quarter 2005
- April 30, 2006 – Groundwater Monitoring Report, First Quarter 2006

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

c: Ron Scheele, Cambria Environmental Technology, Inc., 5900 Hollis St., Suite A,
Emeryville, CA 94608
Donna Drogos
File

R0129

CAMBRIA**Fax**

To: Don Hwang
Company: Alameda County Health Care Services Agency
Fax: (510) 337-9432
Phone: (510) 567-6746

From: Mary C. Holland-Ford
Phone: 510-420-3307
Fax: 510-420-9170
Pages: 2
Date: November 21, 2003
Re: Douglas Parking site

Hard Copy- to Follow? Yes X No

Request for Extension for 1721 Webster, Oakland, CA pilot test report.

Mary C. Holland-Ford, RG
Project Geologist

This fax transmittal is intended solely for use by the person or entity identified above. Any copying or distribution of this document by anyone other than the intended recipient is strictly prohibited. If you are not the intended recipient, please telephone us immediately and return the original transmittal to us at the address listed below.

Cambria Environmental Technology, Inc., 5900 Hollis St., Suite A, Emeryville, CA 94608 Tel (510) 420-0700 Fax (510) 420-9170

C A M B R I A

November 21, 2003

Mr. Don Hwang
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Re: **Request for Extension**
Douglas Parking Company
1721 Webster Street
Oakland, California
ACHCSA StID 4070
Cambria Project No. 580-0197

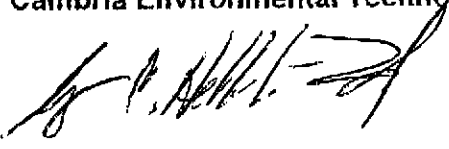


Dear Mr. Hwang:

On behalf of Douglas Parking Company, Cambria Environmental Technology, Inc. (Cambria) requests a 30-day extension for submittal of the *Soil Vapor Extraction/Air Sparge Feasibility Test Report* for the site referenced above. Cambria conducted the pilot test on October 4, 2003, and will submit this report by December 22, 2003. If you have any questions please feel free to call me at (510) 420-3307.

Sincerely,

Cambria Environmental Technology, Inc.


Mary C. Holland-Ford, R.G.
Project Geologist

cc: Mr. Leland Douglas, Douglas Parking Company, 1721 Webster Street, Oakland, California 94612

H:\Sb-2004 (UST Fund)\Douglas Parking\1721 Webster\Faxes & Correspondence\request for extension Nov 2003.doc

**Cambria
Environmental
Technology, Inc.**

5900 Hollis Street
Suite A
Emeryville, CA 94608
Tel (510) 420-0700
Fax (510) 420-9170

C A M B R I A

November 21, 2003

RO 129

Mr. Don Hwang
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Alameda County

NOV 25 2003

Environmental Health

Re: **Request for Extension**
Douglas Parking Company
1721 Webster Street
Oakland, California
ACHCSA StID 4070
Cambria Project No. 580-0197



Dear Mr. Hwang:

On behalf of Douglas Parking Company, Cambria Environmental Technology, Inc. (Cambria) requests a 30-day extension for submittal of the *Soil Vapor Extraction/Air Sparge Feasibility Test Report* for the site referenced above. Cambria conducted the pilot test on October 4, 2003, and will submit this report by December 22, 2003. If you have any questions please feel free to call me at (510) 420-3307.

Sincerely,

Cambria Environmental Technology, Inc.

Mary C. Holland-Ford, R.G.
Project Geologist

cc: Mr. Leland Douglas, Douglas Parking Company, 1721 Webster Street, Oakland, California 94612

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**Cambria
Environmental
Technology, Inc.**

5900 Hollis Street
Suite A
Emeryville, CA 94608
Tel (510) 420-0700
Fax (510) 420-9170

C A M B R I A

November 21, 2003

Mr. Don Hwang
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Alameda County

NOV 25 2003

Environmental Health

Re: **Request for Extension**
Douglas Parking Company
1721 Webster Street
Oakland, California
ACHCSA SID 4070
Cambria Project No. 580-0197



Dear Mr. Hwang:

On behalf of Douglas Parking Company, Cambria Environmental Technology, Inc. (Cambria) requests a 30-day extension for submittal of the *Soil Vapor Extraction/Air Sparge Feasibility Test Report* for the site referenced above. Cambria conducted the pilot test on October 4, 2003, and will submit this report by December 22, 2003. If you have any questions please feel free to call me at (510) 420-3307.

Sincerely,

Cambria Environmental Technology, Inc.

Mary C. Holland-Ford, R.G.
Project Geologist

cc: Mr. Leland Douglas, Douglas Parking Company, 1721 Webster Street, Oakland, California 94612

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**Cambria
Environmental
Technology, Inc.**

5900 Hollis Street
Suite A
Emeryville, CA 94608
Tel (510) 420-0700
Fax (510) 420-9170

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

September 23, 2003

Lee Douglas
Douglas Parking
1721 Webster Street
Oakland, CA 94612-3411

Dear Mr. Douglas:

Subject: Fuel Leak Case No. RO0000129, Douglas Parking, 1721 Webster Street,
Oakland, CA 94612-3411

Alameda County Environmental Health (ACEH) staff has reviewed the Leaking Underground Storage Tank Oversight Program file including "Work Plan Addendum - Proposed Feasibility Testing" dated August 12, 2003 by Cambria Environmental Technology. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

1. Site Characterization – 16,000 micrograms/liter (ug/l) Total Petroleum Hydrocarbons-Gasoline (TPH-G), 20,000 ug/l TPH-G, and 16,000 ug/l TPH-G, were detected in soil borings, SB-A, SB-B, and SB-C, respectively, located east of the former underground tanks, on February 22, 1996. East of these borings, grab groundwater samples, HP-1 and HP-2, detected 18,000 ug/l and 46 ug/l benzene, respectively, on March 19, 1993. The HP-1 and HP-2 samples were noted in "Subsurface Investigation Report" dated July 16, 1996 by Cambria Environmental Technology. These samples were collected by Applied Geosciences, Inc. In the Cambria report, TPH-G grab groundwater concentrations, the depths at which the samples were collected, and boring logs were not provided. The missing information will help determine if the plume needs to be further defined east of the borings. Please provide.
2. Source Characterization – 580 mg/kg and 680 mg/kg TPH-G were detected at soil borings, SB-B, and SB-D, located east and northeast of the former underground tanks, respectively. "Subsurface Investigation Report" dated July 16, 1996 by Cambria Environmental Technology, noted that soil samples collected near the grab groundwater samples HP-1 and HP-2 on May 18, 1993, did not detect TPH-G or benzene at a depth of 20 ft. However, the soil sample locations and boring logs were not provided. The missing information will help determine if the soil contamination needs to be further defined east of the borings. Please provide.

- 3 . Preferential Pathway Survey – We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site. Please submit map(s) and cross-sections showing the location and depth of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s). Evaluate the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers. Please submit.
- 4 . Well Survey – Locate wells within a quarter mile radius of the site. Show the location of the wells and the site on a map and tabulate well construction details for each well. Please submit.
- 5 . Historical Hydraulic Gradients – Please show using a rose diagram with magnitude and direction; include cumulative groundwater gradients in all future reports submitted for this site.
- 6 . Groundwater Analyses – We request that you include the other fuel oxygenates Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), and Tertiary Butyl Alcohol (TBA), Ethanol by EPA Method 8260 and the lead scavengers, Ethylene Dibromide (EDB), Ethylene Dichloride (EDC) for analyses of grab and monitoring well groundwater samples, and for the lead scavengers, EDB and EDC, also perform analyses on soil samples. If any of the latter compounds are detected, and are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan.
- 7 . Proposed Feasibility Testing – A diagram of and procedures for the previously approved soil vapor extraction and air sparging tests have been provided.

TECHNICAL REPORT REQUEST

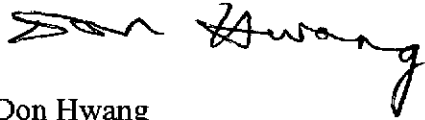
Please submit the following technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

- October 31, 2003 - Groundwater Monitoring Report, Third Quarter 2003
- November 23, 2003 - HP-1 and HP-2 grab groundwater concentrations, depths, and boring logs.
- November 23, 2003 - May 18, 1993 soil sample locations and boring logs
- November 23, 2003 - Preferential Pathway Survey
- November 23, 2003 - Well Survey
- November 23, 2003 - Soil vapor extraction and air sparging test results
- January 31, 2004 - Groundwater Monitoring Report, Fourth Quarter 2003
- April 30, 2004 – Groundwater Monitoring Report, First Quarter 2004
- July 31, 2004 - Groundwater Monitoring Report, Second Quarter 2004

Mr. Douglas
September 23, 2003
Page 3 of 3

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. If you have any questions, please call me at (510) 567-6746.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hwang". The signature is written in a cursive style with a long, sweeping tail on the "g".

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

c: Mary C. Holland-Ford, Cambria Environmental Technology, Inc., 5900 Hollis St., Suite A,
Emeryville, CA 94608
Donna Drogos
File



State Water Resources Control Board

Division of Financial Assistance

1001 I Street • Sacramento, California 95814
P.O. Box 944212 • Sacramento, California • 94244-2120
(916) 341-5757 • FAX (916) 341-5806 • www.swrcb.ca.gov/cwphome/ustcf

Winston H. Hickox
Secretary for
Environmental
Protection

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.swrcb.ca.gov.



Gray Davis
Governor

March 5, 2003

Douglas Parking Company
Leland Douglas
1721 Webster St
Oakland, CA 94612

**PRE-APPROVAL OF CORRECTIVE ACTION COSTS,
CLAIM NO. 008988, PA # 11
SITE ADDRESS: 1721 WEBSTER ST, OAKLAND, CA 94612**

I have reviewed your request, received on February 14, 2003, for pre-approval of corrective action costs. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective action costs.

With the following provisions, the total cost pre-approved as eligible for reimbursement for completing the March 28, 2002, Cambria workplan approved by the Alameda County EHD (County) in their April 29, 2002 letter, is \$ 24,305; see the table below for a breakdown of costs. (The total amount that has been reimbursed and approved for payment up to this point is \$ 125,097.)

Be aware that this pre-approval does not constitute a decision on reimbursement: **necessary** (as determined by the Fund) corrective action costs for action work **directed and approved by the County** will be eligible for reimbursement at costs consistent with those pre-approved in this letter. However, depending on what happens in the field, some costs may not actually be necessary.

In an effort to expedite future reimbursement requests associated with the implementation of the corrective action tasks pre-approved in this letter, we ask that the attached 'Pre-Approval Specific Reimbursement Request Form' be completed, updated and submitted with each reimbursement request. All relevant supporting documentation must also be included with each reimbursement request.

In order for future costs for corrective action to be part of the expedited reimbursement process, they must be pre-approved in writing by Fund staff.

All costs for corrective action must meet the requirements of Article 11, Chapter 16, Underground Storage Tank Regulations in order to be eligible for reimbursement.

California Environmental Protection Agency

COST PRE-APPROVAL BREAKDOWN

#	Task*	Amount Pre-Approved	Comments
1	Pre-Field Activities & Permitting	\$2,879	This cost includes all time, materials and markups associated with this task. Copies of all permits must be submitted to the Fund.
2	Install 2-30' Monitoring Wells, Analytical, Traffic Control, Survey, Etc.	\$12,015	This cost includes all time, materials and markups associated with this task. Copies of all sub-invoices must be submitted to the Fund.
3	Well Development	\$ 716	This cost includes all time, materials and markups associated with this task.
4	Waste Disposal	\$1,770	This cost includes all time, materials and markups associated with this task. Copies of all disposal must be submitted to the Fund.
5	Report	\$3,760	Copies of all reports must be submitted to the Fund.
6	Additional Analytical per ACHCSA Request	\$ 690	This cost includes all time, materials and markups associated with this task
7	Feasibility Test WP	\$2,475	Copies of all reports must be submitted to the Fund.
	TOTAL PRE-APPROVED	\$ 24,305	

* Task descriptions are the same as those identified in Cambria's October 28, 2002 cost estimate.

- Only the tasks/costs reflected on the above table are pre-approved at this time. The Fund will review any tasks/costs that go beyond the pre-approved amount to be determined if the additional tasks and costs are necessary and reasonable. However, if costs exceed the above pre-approved amounts, the Fund will be unable to expedite your Reimbursement Request.
- The work products must be acceptable to the County and the Regional Water Quality Control Board.
- If a different scope of work becomes necessary, then you must request pre-approval of costs on the new scope of work.

March 5, 2003

- Although I have referred to the Cambria proposal in my pre-approval above, please be aware that you will be entering into a private contract: the State of California cannot compel you to sign any specific contract. This letter **pre-approves the costs** as presented in the proposal dated October 28, 2002 by Cambria for conducting the work approved by the County.

I also want to remind you that the Fund's regulations require that you obtain at least three bids, or a bid waiver from Fund staff, from qualified firms for all necessary future corrective action work. If you need assistance in procuring contractor and consultant services, don't hesitate to call me.

Please remember that it is still necessary to submit the actual costs of the work as explained in the Reimbursement Request Instructions to confirm that the costs are consistent with this pre-approval before you will be reimbursed. *Please insure that your consultant prepares their invoices to include the required breakdown of costs on a time and materials basis, that invoiced tasks are consistent with the original proposal, and that reasonable explanations are provided for any changes made in the scope of work or increases in the costs. When the invoices are submitted you must include copies of all:*

- *subcontractor invoices,*
- *technical reports, when available, and*
- *applicable correspondence from the County.*

Please call if you have any questions; I can be reached at (916) 341-5757.

Sincerely,



Sunil Ramdass, Water Resources Control Engineer
Technical Review Unit
Underground Storage Tank Cleanup Fund

Enclosure

cc: Ms. Donna Drogos
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577

Mary C. Holland-Ford
1144 65th Street, Suite B
Oakland, CA 94608



State Water Resources Control Board

Division of Clean Water Programs

1001 I Street • Sacramento, California 95814

P.O. Box 944212 • Sacramento, California • 94244-2120

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Winston H. Hickox
Secretary for
Environmental
Protection

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Gray Davis
Governor

November 27, 2002

Douglas Parking Company
Leland Douglas
1721 Webster St
Oakland, CA 94612

Alameda County
DEC 09 2002
Environmental Health

**REQUEST FOR ADDITIONAL INFORMATION FOR PRE-APPROVAL OF
CORRECTIVE ACTION COSTS, CLAIM NO. 008988, PA # 9
SITE ADDRESS: 1721 WEBSTER ST, OAKLAND, CA 94612**

I have reviewed your request, received on November 1, 2002, for pre-approval of corrective action costs.

Your pre-approval request submittal is incomplete and cannot be processed at this time. The following marked items were not included in your submittal and must be submitted before Fund staff can review and determine the reasonableness and necessity of the costs. I will place these documents in your claim file for future reference.

- A minimum of three competitive bids is required for the proposed scope of work.** The proposed corrective action activity in your Pre-Approval Request requires a minimum of three competitive bids. If the prime consultant or the prime contractor identified in the Pre-Approval Request has not been selected utilizing a competitive bid process, then a minimum of three bids must be received for their services. Three bids are required for all corrective action work. However, we typically only require the project to demonstrate compliance at the soil and groundwater investigation phase and the remediation phase. At least one competitive bid process must occur at each of these two phases.
- A completed "Cost Pre-Approval Request" form; signed by the claimant or an authorized representative.** I have enclosed with this letter a copy of the "Cost Pre-Approval Request" form; please use this form in the future to request pre-approval of corrective action costs. If an authorized representative signs the pre-approval request form, then an authorized representative form must be on file for this claim or submitted with your request.
- A complete and signed copy of the proposed investigative work plan, corrective action plan, or other work plan, including copies of all work plan addenda.**

California Environmental Protection Agency

- A signed copy of the appropriate lead regulatory oversight agency approval letter for the proposed plan and all addenda.

- A complete copy of the Request for Bids (RFB) and a list of all firms invited to bid. It is strongly recommended that the RFB include a "fill-in-the-blanks" Bid Form identifying all major tasks of the proposed work along with the following minimum cost breakdown items for each task:
 - ◆ List of all staff/worker classifications and hourly rates of each to be utilized.
 - ◆ The number of hours to be utilized by each staff/worker
 - ◆ Subcontractor costs
 - ◆ Equipment costs
 - ◆ Itemized listing of estimated ancillary/incidental costs

- Complete copies of all bids and other correspondence received in response to the RFB. All cost proposals should include the *completed* cost proposal breakdown, with task subtotals and a grand total cost for the entire scope of work.

If you need assistance in procuring contractor and consultant services or if you have any questions, don't hesitate to call me. I can be reached at (916) 341-5757.

Sincerely,

Sunil Ramdass

Sunil Ramdass, Water Resources Control Engineer
Technical Review Unit
Underground Storage Tank Cleanup Fund

Enclosure

cc: Ms. Donna Drogos
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577

20129



June 3, 2002

JUN 05 2002

Mr. Barney M. Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
Environmental Health Services
1131 Harbor Bay parkway, Suite 250
Alameda, CA 94502-6577

Re: 1721 and 1750 Webster Street
Oakland, California

Dear Mr. Chan:

Thank you for your response to my letter dated May 17th and our subsequent follow-up telephone conversation on May 30th.

As we discussed, you will be sending me a copy of the approved Subsurface Investigation Workplan for 1721 Webster Street prepared for the property owner Leland Douglas by his consultant, Cambria Environmental. It is my understanding that the purpose of the two (2) additional groundwater monitoring wells is to further characterize the hydrocarbon contaminant plume known to originate from Mr. Douglas's property and to identify the possibility of other off-site upgradient plume(s).

Once these two (2) wells have been installed and groundwater monitoring has commenced, it might be appropriate for Prentiss Properties to concurrently take groundwater samples from the three (3) wells on our 1750 Webster Street property in a broader effort to identify and compare the location(s) of the plume(s), their gradient(s) and contaminant characteristics.

We would like to explore all reasonable opportunities to identify any potential upgradient properties that may be a source of the subsurface contamination on our site to ultimately hold the property owner(s) responsible for the clean up. Please let me know if we can be of any assistance.

Sincerely,

PRENTISS PROPERTIES LIMITED, INC.

Charles A. Sumner II
Vice President
Development and Asset Management

cc: Dan Cushing
William D. Wick, Esq.

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES

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

May 23, 2002

Mr. Charles Sumner II
Prentiss Properties
2485 Natomas Park Drive, Suite 350
Sacramento, CA 95833

RO 129

Re: 1721 and 1750 Webster St., Oakland, CA 94607

RO
129

Dear Mr. Sumner:

This letter responds to your inquiry regarding the status of the subsurface investigation at 1721 Webster St., Oakland CA 94607 aka the Douglas Parking site. A work plan for the installation of two up-gradient monitoring wells has been submitted and approved in my April 29, 2002 letter, copy enclosed. The wells are to be installed "as soon as possible". You will also notice that our office is requesting information about and the performance of the previously proposed soil vapor extraction/air sparge test at this site. Hopefully, this will prove to be an appropriate remediation approach for the site.

I noticed in your letter that you have commenced development feasibility reevaluation for the 1750 Webster St. property. You are reminded that groundwater contamination at this site was deemed not to pose a risk to the development of a non-enclosed parking lot ie little to no indoor air exposure. If your future plans include indoor air exposures, a revised risk assessment will be required. It would also be advisable to resample the wells on your property to obtain current data to evaluate risk. Lastly, be advised that I am your new caseworker.

You may contact me at (510) 567-6765 with questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

Enclosure (Mr. Sumner)

✓ C: B. Chan, files

Mr. Lee Douglas, 1721 Webster St., Oakland, CA 94607

Mr. B. Clark-Riddell, Cambria Environmental, 1144 65th St., Suite B, Oakland CA 94608

Stat1721&1750WebsterSt



May 17, 2002

MAY 21 2002

Mr. Larry Seto
Senior Hazardous Materials Specialist
Alameda County Health Care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Re: STID 4617
1750 Webster Street
Oakland, California

Dear Mr. Seto:

I am following up to the attached copies of your two letters dated February 16, 2000 in connection with our surface parking lot site located at 1750 Webster Street in the City of Oakland. Based upon work plans approved by Alameda County Health Care Service Agency ("ACHCSA") and resulting soil and groundwater data from our property, you concluded that the groundwater contamination beneath our site is likely the result of migration of pollutants in groundwater from upgradient site(s).

Your second letter dated February 16, 2000 was addressed to Leland Douglas, owner of the neighboring property to the west across Webster Street. In this letter, you indicated that the plume known to exist from his property at 1721 Webster Street may be migrating to our site based upon your comparison of soil and groundwater data from both properties. You requested that Mr. Douglas submit a subsurface work plan to delineate the extent of the plume underneath his property and whether it had migrated to our site.

Would you please advise me if Mr. Douglas has provided you with the subsurface work plan and, if so, whether you have been able to make a determination if his site is the likely source of our groundwater contamination.

We have recently commenced a development feasibility reevaluation of our 1750 Webster Street property. Due to the high concentrations of benzene in the groundwater beneath our site, we need to identify all potential upgradient properties with similar levels of contamination so that we can further investigate and ultimately hold the property owner(s) responsible for clean up of our off-site groundwater pollution.

5/22

Garney's

RO/29

1721 Webster, Oak.

maybe contaminating
this site.

Cay

After you have had an opportunity to review your files, I would appreciate the opportunity to discuss this matter in detail either by telephone or meeting personally with you at your office.

Please contact me at (916) 646-0760 if you have any questions.

Sincerely,

PRENTISS PROPERTIES LIMITED, INC.



Charles A. Sumner II

Vice President

Development and Asset Management

Attachments

cc: Dan Cushing

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

April 29, 2002
StID 4070/RO0000129

Mr. Lee Douglas
Douglas Parking
1721 Webster St.

Re: Subsurface Investigation Workplan, 1721 Webster St., Oakland, CA 94607

Dear Mr. Douglas:

Our office has received and reviewed the March 28, 2002 Subsurface Investigation Workplan for the referenced site prepared by Cambria Environmental, your consultant. The work plan proposes the installation of two monitoring wells (MW-6 and MW-7) to further characterize the hydrocarbon contaminant plume. This work plan is approved and the wells should be installed as soon as possible. Please include the analysis of the following oxygenates and lead scavengers, TAME, ETBE, DIPE, TBA, EDB and EDC in addition to MTBE in the two highest impacted wells.

Our office would also like additional information regarding the proposed soil vapor extraction/air sparge tests, which we have previously approved. Please provide a cross-sectional diagram of the existing remediation wells and describe how each of the tests will be performed and evaluated. We understand that based upon the results of the tests, a recommendation for the most appropriate remediation will be made. These results may also affect our prior recommendation to not proceed with a three month biosparge test.

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. B. Clark-Riddell, Cambria Environmental, 1144 65th St., Suite B, Oakland
CA 94608

Mr. H. Patel, SWRCB, 1001 I St., 17th Floor, Sacramento, CA 95814-2828

Wpap1721WebsterSt



State Water Resources Control Board

Division of Clean Water Programs

1001 I Street • Sacramento, California 95814

P.O. Box 944212 • Sacramento, California • 94244-2120

(916) 341-5757 • FAX (916) 341-5806 • www.swrcb.ca.gov/cwphome/ustcf



Gray Davis
Governor

Winston H. Hickox
Secretary for
Environmental
Protection

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April 10, 2002

Douglas Parking Company
Leland Douglas
1721 Webster St
Oakland, CA 94612

APR 19 2002

**PRE-APPROVAL OF CORRECTIVE ACTION COSTS,
CLAIM NO. 008988, PA # 8
SITE ADDRESS: 1721 WEBSTER ST, OAKLAND, CA 94612**

I have reviewed your request, received on February 20, 2002, for pre-approval of corrective action costs. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective action costs.

With the following provisions, the total cost pre-approved as eligible for reimbursement for 4 events of Quarterly Groundwater Monitoring is \$ 17,472; see the table below for a breakdown of costs. *(The total amount that has been reimbursed and approved for payment up to this point is \$ 111,869.)*


Be aware that this pre-approval does not constitute a decision on reimbursement: **necessary** (as determined by the Fund) corrective action costs for action work **directed and approved by the County** will be eligible for reimbursement at costs consistent with those pre-approved in this letter. However, depending on what happens in the field, some costs may not actually be necessary.

In an effort to expedite future reimbursement requests associated with the implementation of the corrective action tasks pre-approved in this letter, we ask that the attached 'Pre-Approval Specific Reimbursement Request Form' be completed, updated and submitted with each reimbursement request. All relevant supporting documentation must also be included with each reimbursement request.

In order for future costs for corrective action to be part of the expedited reimbursement process, they must be pre-approved in writing by Fund staff.

All costs for corrective action must meet the requirements of Article 11, Chapter 16, Underground Storage Tank Regulations in order to be eligible for reimbursement.

California Environmental Protection Agency

 Recycled Paper

APR 19 2002

April 10, 2002

COST PRE-APPROVAL BREAKDOWN

#	Task*	Amount Pre-Approved	Comments
1	QMRs of 5 MWs for 4 Events, Traffic Control, EDF Data Setup and Submittal, Reports, Waste Disposal.	\$17,472	This cost includes all time, materials and markups associated with this task. (QMRs of 5 MWs for 4 Events, Traffic Control, EDF Data Setup and Submittal, Reports, Waste Disposal, Etc.) Copies of all reports must be submitted to the Fund.
TOTAL PRE-APPROVED		\$ 17,472	

* Task descriptions are the same as those identified in Cambria's February 12, 2002 cost estimate.

- Only the tasks/costs reflected on the above table are pre-approved at this time. The Fund will review any tasks/costs that go beyond the pre-approved amount to be determined if the additional tasks and costs are necessary and reasonable. However, if costs exceed the above pre-approved amounts, the Fund will be unable to expedite your Reimbursement Request.
- The work products must be acceptable to the County and the Regional Water Quality Control Board.
- If a different scope of work becomes necessary, then you must request pre-approval of costs on the new scope of work.
- Although I have referred to the Cambria proposal in my pre-approval above, please be aware that you will be entering into a private contract: the State of California cannot compel you to sign any specific contract. This letter **pre-approves the costs** as presented in the proposal dated February 12, 2002 by Cambria for conducting the work approved by the County.

I also want to remind you that the Fund's regulations require that you obtain at least three bids, or a bid waiver from Fund staff, from qualified firms for all necessary future corrective action work. If you need assistance in procuring contractor and consultant services, don't hesitate to call me.

Please remember that it is still necessary to submit the actual costs of the work as explained in the Reimbursement Request Instructions to confirm that the costs are consistent with this pre-approval before you will be reimbursed. ***Please insure that your consultant prepares their invoices to include the required breakdown of costs on a time and materials basis, that invoiced tasks are consistent with the original proposal, and that reasonable explanations are provided for any changes made in the scope of work or increases in the costs. When the invoices are submitted you must include copies of all:***

April 10, 2002

- *subcontractor invoices,*
- *technical reports, when available, and*
- *applicable correspondence from the County.*

Please call if you have any questions; I can be reached at (916) 341-5757.

Sincerely,

Sunil Ramdass

Sunil Ramdass, Water Resources Control Engineer
Technical Review Unit
Underground Storage Tank Cleanup Fund

Enclosure

cc: Ms. Donna Drogos
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577





State Water Resources Control Board

Division of Clean Water Programs

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Winston H. Hickox
Secretary for
Environmental
Protection

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Gray Davis
Governor

March 13, 2002

Douglas Parking Company
Leland Douglas
1721 Webster St
Oakland, CA 94612

MAR 21 2002

**REQUEST FOR ADDITIONAL INFORMATION FOR PRE-APPROVAL OF
CORRECTIVE ACTION COSTS, CLAIM NO. 008988, PA # 8
SITE ADDRESS: 1721 WEBSTER ST, OAKLAND, CA 94612**

I have reviewed your request, received on February 20, 2002, for pre-approval of corrective action costs.

Your pre-approval request submittal is incomplete and cannot be processed at this time. The following marked items were not included in your submittal and must be submitted before Fund staff can review and determine the reasonableness and necessity of the costs. I will place these documents in your claim file for future reference.

- A minimum of three competitive bids is required for the proposed scope of work.** The proposed corrective action activity in your Pre-Approval Request requires a minimum of three competitive bids. If the prime consultant or the prime contractor identified in the Pre-Approval Request has not been selected utilizing a competitive bid process, then a minimum of three bids must be received for their services. Three bids are required for all corrective action work. However, we typically only require the project to demonstrate compliance at the soil and groundwater investigation phase and the remediation phase. At least one competitive bid process must occur at each of these two phases.
- A completed "Cost Pre-Approval Request" form; signed by the claimant or an authorized representative.** I have enclosed with this letter a copy of the "Cost Pre-Approval Request" form; please use this form in the future to request pre-approval of corrective action costs. If an authorized representative signs the pre-approval request form, then an authorized representative form must be on file for this claim or submitted with your request.
- A complete and signed copy of the proposed investigative work plan, corrective action plan, or other work plan, including copies of all work plan addenda.**
- A signed copy of the appropriate lead regulatory oversight agency approval letter for the proposed plan and all addenda.**

California Environmental Protection Agency



March 13, 2002

MAR 21 2002

- A complete copy of the Request for Bids (RFB) and a list of all firms invited to bid. It is strongly recommended that the RFB include a "fill-in-the-blanks" Bid Form identifying all major tasks of the proposed work along with the following minimum cost breakdown items for each task:
- ◆ List of all staff/worker classifications and hourly rates of each to be utilized.
 - ◆ The number of hours to be utilized by each staff/worker
 - ◆ Subcontractor costs
 - ◆ Equipment costs
 - ◆ Itemized listing of estimated ancillary/incidental costs
- Complete copies of all bids and other correspondence received in response to the RFB. All cost proposals should include the *completed* cost proposal breakdown, with task subtotals and a grand total cost for the entire scope of work.

If you need assistance in procuring contractor and consultant services or if you have any questions, don't hesitate to call me. I can be reached at (916) 341-5757.

Sincerely,

Sunil Ramdass

Sunil Ramdass, Water Resources Control Engineer
Technical Review Unit
Underground Storage Tank Cleanup Fund

Enclosure

cc: Ms. Donna Drogos
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577



State Water Resources Control Board



Division of Clean Water Programs

1001 I Street • Sacramento, California 95814

P.O. Box 944212 • Sacramento, California • 94244-2120

(916) 341-5831 • FAX (916) 341-5806 • www.swrcb.ca.gov/cwphome/ustel

Winston H. Hickox

Secretary for
Environmental
Protection

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Gray Davis
Governor

September 4, 2001

4070

Douglas Parking Company
Leland Douglas
1721 Webster St
Oakland, CA 94612

SEP 07 2001

**PRE-APPROVAL OF CORRECTIVE ACTION COSTS,
CLAIM NO. 008988, PRE-APPROVAL REQUEST NO. 7
SITE ADDRESS: 1721 WEBSTER ST, OAKLAND, CA 94612**

I have reviewed your request, received on August 29, 2001, for pre-approval of corrective action costs. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective action costs.

With the following provisions, the total cost pre-approved as eligible for reimbursement for completing the August 29, 2001, Cambria workplan approved by the Alameda County EHD (County) in their August 15, 2001 letter, is \$ 1,375; see the table below for a breakdown of costs.

Be aware that this pre-approval does not constitute a decision on reimbursement: **necessary** (as determined by the Fund) corrective action costs for action work **directed and approved by the County** will be eligible for reimbursement at costs consistent with those pre-approved in this letter. However, depending on what happens in the field, some costs may not actually be necessary. If the Fund agrees that they were in fact necessary, the Fund will reimburse at reasonable rates (rates consistent with those pre-approved.)

In an effort to expedite future reimbursement requests associated with the implementation of the corrective action tasks pre-approved in this letter, we ask that the attached 'Pre-Approval Specific Reimbursement Request Form' be completed, updated and submitted with each reimbursement request. All relevant supporting documentation must also be included with each reimbursement request.

In order for future costs for corrective action to be part of the expedited reimbursement process, they must be pre-approved in writing by Fund staff.

All costs for corrective action must meet the requirements of Article 11, Chapter 16, Underground Storage Tank Regulations in order to be eligible for reimbursement.

COST PRE-APPROVAL BREAKDOWN

#	Task*	Amount Pre-Approved	Comments
1	Workplan	\$1,375	Pre-approval on health & Safety plan.
TOTAL PRE-APPROVED		\$ 1,375	

* Task descriptions are the same as those identified in Cambria's August 29, 2001 cost estimate.

- Only the tasks/costs reflected on the above table are pre-approved at this time. The Fund will review any tasks/costs that go beyond the pre-approved amount to be determined if the additional tasks and costs are necessary and reasonable. However, if costs exceed the above pre-approved amounts, the Fund will be unable to expedite your Reimbursement Request.
- The work products must be acceptable to the County and the Regional Water Quality Control Board.
- If a different scope of work becomes necessary, then you must request pre-approval of costs on the new scope of work.
- Although I have referred to the Cambria proposal in my pre-approval above, please be aware that you will be entering into a private contract: the State of California cannot compel you to sign any specific contract. This letter **pre-approves the costs** as presented in the proposal dated August 29, 2001 by Cambria for conducting the work approved by the County for implementing the August 29, 2001, Cambria workplan.

I also want to remind you that the Fund's regulations require that you obtain at least three bids, or a bid waiver from Fund staff, from qualified firms for all necessary future corrective action work. If you need assistance in procuring contractor and consultant services, don't hesitate to call me.

Please remember that it is still necessary to submit the actual costs of the work as explained in the Reimbursement Request Instructions to confirm that the costs are consistent with this pre-approval before you will be reimbursed. *Please insure that your consultant prepares their invoices to include the required breakdown of costs on a time and materials basis, that invoiced tasks are consistent with the original proposal, and that reasonable explanations are provided for any changes made in the scope of work or increases in the costs. When the invoices are submitted you must include copies of all:*

- *subcontractor invoices,*
- *technical reports, when available, and*
- *applicable correspondence from the County.*

Douglas Parking Company
Claim No. 008988

-3-

September 4, 2001

Please call if you have any questions; I can be reached at (916) 341-5831.

Sincerely,



Hari Patel, Sanitary Engineering Associate
Technical Review Unit
Underground Storage Tank Cleanup Fund

Enclosure

cc: Mr. Barney M. Chan
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

August 15, 2001
StID 4070/ RO0000129

Mr. Lee Douglas
Douglas Parking
1721 Webster St.
Oakland CA 94612

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

Re: Status of Site Investigation at 1721 Webster St., Oakland CA 94607

Dear Mr. Douglas:

Please be informed that the undersigned is the new case worker for the oversight of the on-going petroleum release at the above referenced site. I have reviewed the file and have spoken with Mr. John Riggi of Cambria Environmental. I was informed that the work plan for the proposed soil vapor extraction / air sparge pilot test has been approved by the Clean-up Fund. After reviewing the February 2001 Feasibility Testing and Feasibility Study Plan, I told Mr. Riggi that the Three Month Biosparge Testing outlined in Task 4, is not recommended by our office. Therefore, you should proceed with the soil vapor extraction / air sparge (SVE/AS) pilot test and then report your findings and recommendations.

As you are aware, based upon testing data it was decided that the groundwater contamination found beneath 1750 Webster St. was not likely from a release on this site, therefore, no further action was required of the property owner. Up-gradient off-site sources were implicated as possible sources of this contamination. Though 1721 Webster St. is an up-gradient source, it has not been shown that it is the source of the contamination found beneath 1750 Webster St., therefore, your remediation need not extend to this property at this time. Our office reserves the right to change this opinion should additional information indicating the contrary arise.

To better characterize this site, our office requests additional site investigation up and cross-gradient of the former underground tanks. The gasoline concentration has remained elevated in MW-3, the up-gradient well and the results of the 2/1996 investigation indicated elevated gasoline in groundwater in the cross-gradient boring SB-E. Please have your consultant propose work, which will further characterize these areas.

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. J. Riggi, Cambria Environmental, 1144 65th St., Suite B, Oakland 94608
Mr. S. Ramdass, UST Cleanup Fund Technical Review Unit, 1001 I St., 17th Floor, Sacramento
CA 95814-2828

1721 Webster St



Winston H. Hickox
Secretary for
Environmental
Protection

State Water Resources Control Board

Division of Clean Water Programs

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Gray Davis
Governor

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.swrcb.ca.gov.

July 30, 2001

Douglas Parking Company
Leland Douglas
1721 Webster St
Oakland, CA 94612

**PRE-APPROVAL OF CORRECTIVE ACTION COSTS,
CLAIM NO. 008988, PRE-APPROVAL REQUEST NO. 6
SITE ADDRESS: 1721 WEBSTER ST, OAKLAND, CA 94612**

I have reviewed your request, received on July 9, 2001, for pre-approval of corrective action costs. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective action costs.

With the following provisions, the total cost pre-approved as eligible for reimbursement for completing the August 13, 1999, Cambria workplan approved by the Alameda County EHD (County) in their September 16, 1999 letter, is \$ 12,156; see the table below for a breakdown of costs.

Be aware that this pre-approval does not constitute a decision on reimbursement: **necessary** (as determined by the Fund) corrective action costs for action work **directed and approved by the County** will be eligible for reimbursement at costs consistent with those pre-approved in this letter. However, depending on what happens in the field, some costs may not actually be necessary. If the Fund agrees that they were in fact necessary, the Fund will reimburse at reasonable rates (rates consistent with those pre-approved.)

In an effort to expedite future reimbursement requests associated with the implementation of the corrective action tasks pre-approved in this letter, we ask that the attached 'Pre-Approval Specific Reimbursement Request Form' be completed, updated and submitted with each reimbursement request. All relevant supporting documentation must also be included with each reimbursement request.

In order for future costs for corrective action to be part of the expedited reimbursement process, they must be pre-approved in writing by Fund staff.

All costs for corrective action must meet the requirements of Article 11, Chapter 16, Underground Storage Tank Regulations in order to be eligible for reimbursement.

California Environmental Protection Agency

COST PRE-APPROVAL BREAKDOWN

#	Task*	Amount Pre-Approved	Comments
1	Feasibility Testing & Pre-field coordination	\$1,120	Preparation for the feasibility testing, planning, permitting, coordination, scheduling, meetings etc.
2	Conduct Installation & Compressor testing	\$2,333	Install piping from the existing compressor to the injection wells and all other activities to conduct the test.
3	AS/VES testing	\$1,200	Conduct four hour tests of AS and VES and combination.
4	Direct Expenses	\$ 525	All necessary equipment and supplies for the installation of piping and tests.
5	Outside expenses	\$1,357	Lab analysis of 4 vapor samples using 8015/8020 and GAC changeouts.
6	Three months biosparge testing	\$3,381	Seven site visits to monitor the AS testing by taking all necessary readings and samples. Includes time, materials, supplies, equipment, instruments and support.
7	Feasibility testing report	\$2,240	Prepare a detailed feasibility study report with well documented information on the test, data (collection, methodology, interpretation and variables), with conclusions, recommendations and detailed design and schedule for site remediation.
	TOTAL PRE-APPROVED	\$ 12,156	

* Task descriptions are the same as those identified in Cambria's February 2, 2001 cost estimate.

- Only the tasks/costs reflected on the above table are pre-approved at this time. The Fund will review any tasks/costs that go beyond the pre-approved amount to be determined if the additional tasks and costs are necessary and reasonable. However, if costs exceed the above pre-approved amounts, the Fund will be unable to expedite your Reimbursement Request.
- The work products must be acceptable to the County and the Regional Water Quality Control Board.
- If a different scope of work becomes necessary, then you must request pre-approval of costs on the new scope of work.
- Although I have referred to the Cambria proposal in my pre-approval above, please be aware that you will be entering into a private contract: the State of California cannot compel you to sign any specific contract. This letter **pre-approves the costs** as presented in the proposal

dated February 2, 2001 by Cambria for conducting the work approved by the County for implementing the August 13, 1999, Cambria workplan.

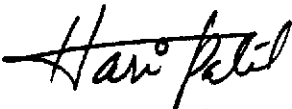
I also want to remind you that the Fund's regulations require that you obtain at least three bids, or a bid waiver from Fund staff, from qualified firms for all necessary future corrective action work. If you need assistance in procuring contractor and consultant services, don't hesitate to call me.

Please remember that it is still necessary to submit the actual costs of the work as explained in the Reimbursement Request Instructions to confirm that the costs are consistent with this pre-approval before you will be reimbursed. ***Please insure that your consultant prepares their invoices to include the required breakdown of costs on a time and materials basis, that invoiced tasks are consistent with the original proposal, and that reasonable explanations are provided for any changes made in the scope of work or increases in the costs. When the invoices are submitted you must include copies of all:***

- *subcontractor invoices,*
- *technical reports, when available, and*
- *applicable correspondence from the County.*

Please call if you have any questions; I can be reached at (916) 341-5831.

Sincerely,



Hari Patel, Sanitary Engineering Associate
Technical Review Unit
Underground Storage Tank Cleanup Fund

Enclosure

cc: Ms. Susan Hugo
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577



State Water Resources Control Board



Winston H. Hickox
Secretary for
Environmental
Protection

Division of Clean Water Programs
1001 I Street • Sacramento, California 95814 • (916) 341-5831
Mailing Address: P.O. Box 944212 • Sacramento, California • 94244-2120
FAX (916) 341-5806 • Internet Address: <http://www.swrcb.ca.gov/cwphome/ustcf>

Gray Davis
Governor

November 14, 2000

RO 0129
B.C

ENVIRONMENTAL
PROTECTION
00 NOV 21 PM 4: 03

Leland Douglas
Douglas Parking Company
1721 Webster St
Oakland, CA 94612

**PRE-APPROVAL OF CORRECTIVE ACTION COSTS,
CLAIM NO. 008988, PRE-APPROVAL REQUEST NO. 4 (APPROVED)
SITE ADDRESS: 1721 WEBSTER ST, OAKLAND, CA 94612**

I have reviewed your request, received on October 17, 2000, for pre-approval of corrective action costs. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective action costs.

With the following provisions, the total cost pre-approved as eligible for reimbursement for completing the October 12, 2000, Cambria Environmental, Inc. workplan approved by the Alameda County EHD (County) in their July 4, 1943 letter, is \$8,136; see the table below for a breakdown of costs.

Be aware that this pre-approval does not constitute a decision on reimbursement: **necessary** (as determined by the Fund) corrective action costs for action work **directed and approved by the County** will be eligible for reimbursement at costs consistent with those pre-approved in this letter. However, depending on what happens in the field, some costs may not actually be necessary. If the Fund agrees that they were in fact necessary, the Fund will reimburse at reasonable rates (rates consistent with those pre-approved.)

In an effort to expedite future reimbursement requests associated with the implementation of the corrective action tasks pre-approved in this letter, we ask that the attached 'Pre-Approval Specific Reimbursement Request Form' be completed, updated and submitted with each reimbursement request. All relevant supporting documentation must also be included with each reimbursement request.

In order for future costs for corrective action to be part of the expedited reimbursement process, they must be pre-approved in writing by Fund staff.

All costs for corrective action must meet the requirements of Article 11, Chapter 16, Underground Storage Tank Regulations in order to be eligible for reimbursement.

COST PRE-APPROVAL BREAKDOWN

#	Task*	Amount Pre-Approved	Comments
1	Labor Personnel	\$1,650	Labor costs for scheduling, traffic control, GW gauging, purging, sampling, report preparation and all coordination related activities per quarter.
2	Direct Expenses	\$ 154	Includes mileage, all equipment and supplies for GW monitoring sampling and traffic control.
3	Laboratory analysis	\$ 230	Laboratory analysis of five GW samples for TPH(g), BTEX and MTBE using EPA method 8015/8020.
4	3-QMR Events	\$6,102	Three additional GW monitoring events with identical scope of work for tasks 1 to 3 listed above.
	TOTAL PRE-APPROVED	\$8,136	

* Task descriptions are the same as those identified in Cambria Environmental, Inc.'s October 12, 2000 cost estimate.

- Only the tasks/costs reflected on the above table are pre-approved at this time. The Fund will review any tasks/costs that go beyond the pre-approved amount to be determined if the additional tasks and costs are necessary and reasonable. However, if costs exceed the above pre-approved amounts, the Fund will be unable to expedite your Reimbursement Request.
- The work products must be acceptable to the County and the Regional Water Quality Control Board.
- If a different scope of work becomes necessary, then you must request pre-approval of costs on the new scope of work.
- Although I have referred to the Cambria Environmental, Inc. proposal in my pre-approval above, please be aware that you will be entering into a private contract: the State of California cannot compel you to sign any specific contract. This letter **pre-approves the costs** as presented in the proposal dated October 12, 2000 by Cambria Environmental, Inc. for conducting the work approved by the County for implementing the October 12, 2000, Cambria Environmental, Inc. workplan.

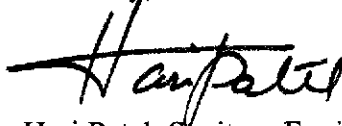
I also want to remind you that the Fund's regulations require that you obtain at least three bids, or a bid waiver from Fund staff, from qualified firms for all necessary future corrective action work. If you need assistance in procuring contractor and consultant services, don't hesitate to call me.

Please remember that it is still necessary to submit the actual costs of the work as explained in the Reimbursement Request Instructions to confirm that the costs are consistent with this pre-approval before you will be reimbursed. *Please insure that your consultant prepares their invoices to include the required breakdown of costs on a time and materials basis, that invoiced tasks are consistent with the original proposal, and that reasonable explanations are provided for any changes made in the scope of work or increases in the costs. When the invoices are submitted you must include copies of all:*

- *subcontractor invoices,*
- *technical reports, when available, and*
- *applicable correspondence from the County.*

Please call if you have any questions; I can be reached at (916) 341-5831.

Sincerely,



Hari Patel, Sanitary Engineering Associate
Technical Review Unit
Underground Storage Tank Cleanup Fund

Enclosure

cc: Mr. Thomas Peacock
✓ Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577



State Water Resources Control Board



Division of Clean Water Programs

1001 I Street • Sacramento, California 95814 • (916) 341-5831

Mailing Address: P.O. Box 944212 • Sacramento, California • 94244-2120

FAX (916) 341-5806 • Internet Address: <http://www.swrcb.ca.gov/cwphome/ustcf>

Winston H. Hickox
Secretary for
Environmental
Protection

Gray Davis
Governor

RO 129
October 25, 2000

Leland Douglas
Douglas Parking Company
1721 Webster St
Oakland, CA 94612

STTD 4070
ES

RECEIVED
JUL 2 2000
COST CLEANUP FUND

BC
~~RO 129~~
AJT
TOP

**REQUEST FOR PRE-APPROVAL OF CORRECTIVE ACTION COSTS,
CLAIM NO. 008988, PRE-APPROVAL REQUEST NO. 4
SITE ADDRESS: 1721 WEBSTER ST, OAKLAND, CA 94612**

STTD 4070
AJT

I have reviewed your request, received on October 17, 2000, for pre-approval of corrective action costs; I will place these documents in your file for future reference. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective action costs.

Pursuant to Section 2811.4, subdivision (c), of the Cleanup Fund regulations and based upon the materials submitted, the Cleanup Fund must deny your request for pre-approval. You have failed to submit the required three bids for the tasks covered by your pre-approval request. Also the, single bid you provided for the task covered by your pre-approval request is unreasonable for the scope of work. Based on the Cleanup Fund's experience with similar sites in your area, we have determined that \$7,136 is reasonable for the tasks included in your pre-approval request. The breakdown of costs associated with each task is shown in Table 1 below. Based upon the information you submitted and in the absence of additional bids, we can only pre-approve \$ 7,136.

There are two options available to you. You must secure the requisite bids for the tasks covered by the pre-approval request, and the Cleanup Fund will evaluate the reasonableness of the costs in light of the additional bids.

Or, you may resubmit the existing bid and request pre-approval for the amounts specified in Table 1. Since the Cleanup Fund has determined that the amount specified in Table 1 is reasonable for this scope of work, the three-bid requirement is unnecessary if you concur with the Cleanup Fund's determination. The Cleanup Fund has the authority to waive the three-bid requirement as unnecessary upon your request to do so. Therefore, if your resubmitted pre-approval request only seeks pre-approval for the amount the Cleanup Fund has determined reasonable (the amount specified in Table 1) and you request waiver of the three-bid requirement as unnecessary, the Cleanup Fund will grant your request for pre-approval and waive the three bid requirement, with respect to this scope of work, as unnecessary.

A waiver does not waive the three-bid requirement for the claim, but only for the tasks covered by the pre-approval request. Again, if you decide to seek waiver of the three-bid requirement

because it is unnecessary, then you must provide a written request for waiver of the three-bid requirement and resubmit your pre-approval request seeking only the amounts specified in Table 1. In an effort to assist you in expediting the pre-approval process we have prepared the attached *Acceptance of Reasonable Cost/Request for Bid Waiver* form letter. If you concur/accept our reasonable cost determination and would like to request a bid waiver, then just sign and date the attached letter and return to us for further processing your Pre-Approval.

Table 1
REASONABLE COST BREAKDOWN

#	Task*	Reasonable Cost, \$	Comments/Changes
1	Labor Personnel	\$1,400	Labor costs for scheduling, traffic control, GW gauging, purging, sampling, report preparation and all coordination related activities per quarter. The QMR report must contain figures for flow gradients, isoconcentration maps in GW [TPH(g), TPH(d), benzene, MTBE], conclusions & Recommendations.
2	Direct Expenses	\$ 154	Includes mileage, all equipment and supplies for GW monitoring sampling and traffic control.
3	Laboratory analysis	\$ 230	Laboratory analysis of five GW samples for TPH(g), BTEX and MTBE using EPA method 8015/8020.
4	3-QMR Events	\$5,352	Three additional GW monitoring events with identical scope of work for tasks 1 to 3 listed above.
	TOTAL Reasonable Cost	\$7,136	

* Task descriptions are the same as those identified in Cambria Environmental, Inc.'s October 12, 2000 Cost Estimate

Should you decide to obtain the additional bids for satisfying the three-bid requirement, and if you need assistance in procuring contractor and consultant services for corrective action don't hesitate to call me at (916) 341-5831.

Sincerely,



Hari Patel, Sanitary Engineering Associate
Technical Review Unit
Underground Storage Tank Cleanup Fund

Enclosure

cc: Mr. Thomas Peacock
Alameda County EHD
✓ 1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577



State Water Resources Control Board

Division of Clean Water Programs

2014 T Street • Sacramento, California 95814 • (916) 227-
Mailing Address: P.O. Box 944212 • Sacramento, California • 94244-2120
FAX (916) 227-4530 • Internet Address: <http://www.swrcb.ca.gov/~cwphome/ustcf>

ENVIRONMENTAL
PROTECTION



Gray Davis
Governor

Winston H. Hickox
Secretary for
Environmental
Protection

00 : 30 AM 10: 26

March 27, 2000

cc
Mr. Leland Douglas
1721 Webster Street
Oakland, CA 94612-3411

**PRE-APPROVAL OF CORRECTIVE ACTION COSTS, CLAIM NO. 8988,
SITE ADDRESS: 1721 WEBSTER STREET, OAKLAND**

I have reviewed your request, received on March 7, 2000 for pre-approval of corrective action costs; I will place these documents in your file for future reference. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective action costs.

With the following provisions, the **total cost pre-approved** as eligible for reimbursement for the file review and conduit study, is **\$3,192.00**. The cost proposal for this work by Cambria is approved for eligible costs for the amount shown above.

In an effort to expedite future reimbursement requests associated with the implementation of these pre-approved tasks, we request that the attached budget tracking form be completed/updated and submitted with the relevant supporting documentation.

Be aware that this pre-approval does not constitute a decision on reimbursement: all reasonable and necessary corrective action costs for work directed and approved by the local regulator will be eligible for reimbursement per the terms of your Letter of Commitment at costs consistent with those pre-approved in this letter.

***All future costs for corrective action must be approved in writing by Fund staff.
Future costs for corrective action must meet the requirements of
Article 11, Chapter 16, Underground Storage Tank Regulations.***

- The actual costs and scope of work performed must be consistent with the pre-approval for it to remain valid.
- The work products must be acceptable to Alameda County Health Care Services (ACHCS).
- If a different scope of work becomes necessary, then you must request pre-approval of costs on the new scope of work.

California Environmental Protection Agency

- Although I have referred to the Cambria proposal in my pre-approval above, please be aware that you will be entering into a private contract: the State of California cannot compel you to sign any specific contract.

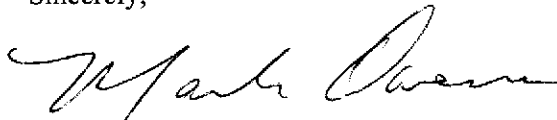
I also want to remind you that the Fund's regulations require that you obtain at least three bids, or a bid waiver from Fund staff, from qualified firms for all future necessary corrective action work.

Please remember that it is still necessary to submit the actual costs of the work as explained in the Reimbursement Request Instructions to confirm that the costs are consistent with this pre-approval before you will be reimbursed. ***Please insure that your consultant prepares their invoices to include the required break down of costs on a time and materials basis, that invoiced tasks are consistent with the original proposal, and that reasonable explanations are provided for any changes made in the scope of work or increases in the costs. When the invoices are submitted you must include copies of all:***

- *subcontractor invoices (includes lab invoices)*
- *technical reports, when available, and*
- *applicable correspondence from ACHCS.*

Please call if you have any questions; I can be reached at (916) 227-7883.

Sincerely,



Mark Owens, Water Resources Control Engineer
Technical Review Unit
Underground Storage Tank Cleanup Fund

cc: Mr. Larry Seto, Alameda County Health Care Services, Alameda



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

February 25, 2000

Mr. Leland Douglas
Douglas Parking LLC
1721 Webster Street
Oakland, CA 94612-3411
STID 4070

RE: 1721 Webster Street, Oakland, CA 94612

Dear Mr. Douglas:

I sent you a letter dated February 16, 2000 concerning the above site. **The second sentence should read, "Historical groundwater data from both sites indicates groundwater flows from 1721 Webster towards 1750 Webster Street.** Enclosed is an amended letter. Please discard my letter dated February 16, 2000.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Mr. Charles A. Sumner II, Prentiss Properties, 2485 Natomas Park Drive,
Suite 350, Sacramento, CA 95833
Leroy Griffin, 1605 Martin Luther King, Oakland, CA 94612
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

February 25, 2000

Mr. Leland Douglas
Douglas Parking LLC
1721 Webster Street
Oakland, CA 94612-3411
STID 4070

RE: 1721 Webster Street, Oakland, CA 94612

Dear Mr. Douglas:

I have compared the soil and groundwater data from your property and the neighboring property across the street at 1750 Webster Street. Historical groundwater data from both sites indicates groundwater flows from 1721 Webster Street towards 1750 Webster Street. It appears the plume from your site maybe migrating off-site to 1750 Webster Street. Please submit a subsurface workplan to delineate the extent of the plume underneath 1721 Webster, and specifically whether the plume has migrated to 1750 Webster Street, Oakland,

If you have any questions, please contact me at (510) 567-6774.

Sincerely,


Larry Seto
Sr. Hazardous Materials Specialist

Mr. Charles A. Sumner II, Prentiss Properties, 2485 Natomas Park Drive,
Suite 350, Sacramento, CA 95833
Leroy Griffin, 1605 Martin Luther King, Oakland, CA 94612
Files

Prentiss Properties

Limited, Inc.

2485 Natomas Park Drive, Suite 350
Sacramento, CA 95833916
646-0760FAX: 916
646-3245

FACSIMILE TRANSMITTAL

Mr. Larry Seto

Sr. Hazardous Materials Specialist

Alameda County Health Care Services

Environmental Health Services

Environmental Protection

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

Fax (510) 337-9335

DATE: February 24, 2000

RE: 1750 Webster Street

Oakland, CA 94612

WE ARE FORWARDING VIA MAIL MESSENGER EXPRESS MAIL FAX
2 NO. OF PAGES

OF COPIES

DESCRIPTION

1

Letter dated February 16, 2000 to Leland Douglas

REMARKS:

Mr. Seto:

In reading this letter it appears that you have transposed the addresses indicating the groundwater flow. The flow is from 1721 Webster Street toward 1750 Webster Street.

Please correct this letter as indicated and forward to Mr. Douglas as soon as possible.

Please contact me at (916) 646-0760 if you have any questions.

PRENTISS PROPERTIES LIMITED, INC.



BY: Charles A. Sumner II
Vice President
Development and Asset Management

THIS MATERIAL IS SENT FOR REVIEW YOUR FILES APPROVAL AS REQUESTED
 OTHER

CAUTION:

The information contained in this facsimile communication is intended for the use of the addressee and may be confidential, may be privileged, and may constitute inside information. If any reader of this communication is not the intended recipient, or an employee or agent of the sender who is responsible for delivering the communication to the intended recipient, unauthorized use, disclosure or copying is strictly prohibited, and may be unlawful. If you have received this communication in error, please notify us immediately at (916) 646-0760. Thank you.

ALAMEDA COUNTY
HEALTH CARE SERVICESAGENCY
DAVID J. KEARS, Agency DirectorENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION (LOP)
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

February 16, 2000

Mr. Leland Douglas
Douglas Parking LLC
1721 Webster Street
Oakland, CA 94612-3411
STID 4070

RE: 1721 Webster Street, Oakland, CA 94612

Dear Mr. Douglas:

I have compared the soil and groundwater data from your property and the neighboring property across the street at 1750 Webster Street. Historical groundwater data from both sites indicates groundwater flows from 1721 Webster Street towards 1750 Webster Street. It appears the plume from your site may be migrating off-site to 1750 Webster Street. Please submit a subsurface workplan to delineate the extent of plume underneath 1721 Webster, and specifically whether the plume has migrated to 1750 Webster, Oakland.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,


Larry Seto
Sr. Hazardous Materials SpecialistCc: Mr. Charles A. Sumner II, Prentiss Properties, 2485 Natomas Park Drive,
Suite 350, Sacramento, CA 95833
Leroy Griffin, 1605 Martin Luther King, Oakland, CA 94612
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

February 16, 2000

Mr. Leland Douglas
Douglas Parking LLC
1721 Webster Street
Oakland, CA 94612-3411
STID 4070

RE: 1721 Webster Street, Oakland, CA 94612

Dear Mr. Douglas:

I have compared the soil and groundwater data from your property and the neighboring property across the street at 1750 Webster Street. Historical groundwater data from both sites indicates groundwater flows from 1750 Webster Street towards 1721 Webster Street. It appears the plume from your site may be migrating off-site to 1750 Webster Street. Please submit a subsurface workplan to delineate the extent of plume underneath 1721 Webster, and specifically whether the plume has migrated to 1750 Webster, Oakland.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,


Larry Seto
Sr. Hazardous Materials Specialist

Cc: Mr. Charles A Sumner II, Prentiss Properties, 2485 Natomas Park Drive,
Suite 350, Sacramento, CA 95833
Leroy Griffin, 1605 Martin Luther King, Oakland, CA 94612
Files



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

February 16, 2000

Mr. Leland Douglas
Douglas Parking LLC
1721 Webster Street
Oakland, CA 94612-3411
STID 4070

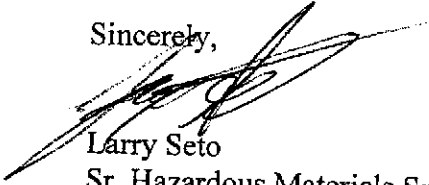
RE: 1721 Webster Street, Oakland, CA 94612

Dear Mr. Douglas:

I have compared the soil and groundwater data from your property and the neighboring property across the street at 1750 Webster Street. Historical groundwater data from both sites indicates groundwater flows from 1750 Webster Street towards 1721 Webster Street. It appears the plume from your site may be migrating off-site to 1750 Webster Street. Please submit a subsurface workplan to delineate the extent of plume underneath 1721 Webster, and specifically whether the plume has migrated to 1750 Webster, Oakland.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,


Larry Seto
Sr. Hazardous Materials Specialist

Cc: Mr. Charles A Sumner II, Prentiss Properties, 2485 Natomas Park Drive,
Suite 350, Sacramento, CA 95833
Leroy Griffin, 1605 Martin Luther King, Oakland, CA 94612
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION (LOP)

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700

FAX (510) 337-9335

February 16, 2000

Mr. Charles A. Sumner II
Vice President -- Development & Asset Management
Prentiss Properties (Property owner of 1750 Webster Street)
2485 Natomas Park Drive, Suite 350
Sacramento, CA 95833

MAY 21 2002

Mr. Leland Douglas
Douglas Parking LLC (Property owner of 1721 Webster Street)
1721 Webster Street
Oakland, CA 94612-3411

RE: STID 4617, 1750 Webster Street, Oakland, CA 94612

Dear Messrs. Sumner & Douglas:

I have reviewed the site file for the above address for the purpose of determining whether the subsurface contamination at the above site is from an on-site or off-site source. In summary, the following information is contained in the County's file. The site and site vicinity have generally been developed since at least 1899. The site was used for residential purposes until at least 1936 based on the Reverse Business Directory. Since 1936, the site has been used for a parking lot.

A geophysical survey and groundwater investigation was performed at the site in March 1993. No underground storage tank (UGT) were identified by the geophysical survey, but the two groundwater samples collected (HP-1 and HP-2) had concentrations of total petroleum hydrocarbons as gasoline (TPH-g), and the gasoline related compounds benzene, toluene, ethylbenzene, and total xylenes (BTEX).

In May 1993, a geophysical survey and a follow-up investigation was performed which included advancing four soil borings to depths of approximately 20 feet below ground surface (bgs). Two samples were analyzed from each boring. No significant concentrations of TPH(g) or BTEX were detected in any of the soil samples. No USTs were identified by the geophysical survey.

Mr. Charles A. Sumner II
Prentiss Properties
2485 Natomas Park Drive, Suite 350
Sacramento, CA 95833
Page 2 of 4
February 9, 2000

A subsurface investigation that involved the advancement of twelve soil borings and ground penetrating radar (GPR) survey was performed in February 1998. Groundwater was detected at a depth of approximately 20 feet bgs. None of the soil samples collected from above that depth had detectable concentrations of TPH(g), BTEX or MTBE. All of the ground water samples did have detectable concentrations of TPH(g), BTEX and MTBE, and three had detectable concentrations of HVOCs. Groundwater had up to 760,000 ppb TPH(g), 10,000 ppb benzene, 29,000 ppb toluene, 5,800 ppb ethylbenzene, 17,500 ppb total xylenes.

In order to determine the groundwater gradient at the site, and to perform regular groundwater monitoring, three groundwater monitoring wells (A-1, A-2 and A-3) were installed at the site on April 26, 1998. The soil samples collected during the drilling of the monitoring wells were non-detect for TPH(g), BTEX and MTBE. Groundwater samples collected on April 28, 1998 contained up to 84,000 ppb TPH(g), 12,000 ppb benzene, 20,000 ppb toluene, 1,700 ppb ethylbenzene and 8,400 ppb total xylenes. MTBE was not detected in the groundwater samples.

Groundwater samples were collected for four quarters from April 1998 to February 1999. The most recent groundwater sampling on February 26, 1999 detected up to 89,000 ppb TPH(g), 14,000 ppb benzene, 22,000 ppb toluene, 2,000 ppb ethylbenzene, 9,300 ppb total xylenes. In addition, halogenated volatile organic compounds (HVOC) were detected in the samples. These results are consistent with historical results.

The first quarter 1999 groundwater monitoring event completes a full year of quarterly groundwater monitoring at the site. The groundwater gradient has been consistent northeasterly at the site. None of the contaminants have been detected in the vadose zone soils in any of the 18 soil borings completed.

Based on information currently available to this office and the Regional Water Quality Control Board, San Francisco Bay Region (RWQCB), we conclude that groundwater pollution detected beneath the subject property is likely the result of the migration of pollutants in groundwater from upgradient sites. In general, this office and RWQCB does not pursue enforcement action against a property owner whose land overlies contaminated groundwater if that contamination is solely the result of the migration of groundwater contaminants from an off-site source (possibly 1721 Webster Street) or sources. Accordingly, this office and RWQCB will not name current and future owners of the subject property as dischargers with respect to groundwater pollution from off-site

Mr. Charles Sumner II
Prentiss Properties
2485 Natomas Park Drive, Suite 350
Sacramento, CA 95833
February 9, 2000
Page 3 of 4

sources. However, this office and RWQCB may hold such a property owner responsible for investigation or cleanup tasks if he or she refuses to provide reasonable access to an upgradient discharger attempting to investigate and cleanup off-site groundwater pollution.

The site is currently a parking lot, and the proposed development plan is to erect an aboveground, non-enclosed parking structure. The groundwater beneath the site has been impacted with petroleum constituents. The soil has not been significantly impacted. Versar, Inc. prepared a risk based corrective action assessment (February 23, 1998) only evaluating groundwater. This office concurs with Versar's conclusion that the presence of petroleum constituents within the shallow groundwater does not represent a health concern that will restrict the development of the site as a parking (non-enclosed) structure. However, it is anticipated that any parking structure built on the site would contain some environments which will be more representative of indoor exposures (i.e. - toll booth, maintenance closets). The site specific target levels derived for benzene in groundwater under the indoor exposure scenario was determined to be 1.1 ppm. Currently the highest concentration of benzene in the site groundwater is 14 ppm.

A risk assessment evaluating the "indoor exposure pathway" must be submitted to the local implementing agency for review and approval if any enclosed structure is proposed for the site.

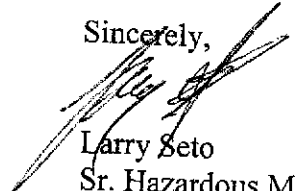
A deed restriction on the site needs to be recorded to ensure the site is re-evaluated if site use changes.

The three monitoring wells on-site, A-1, A-2 and A-3 should not be destroyed. The monitoring well covers must be locked at all times to prevent vandalism. The responsible party for the plume beneath your property can use these wells for future monitoring.

If you have any questions, please contact this office at (510) 567-6774.

Mr. Charles A. Sumner II
Prentiss Properties
2485 Natomas Park Drive, Suite 350
Sacramento, CA 95833
Page 4 of 4

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Chuck Headlee, Regional Water Control Board, 1515 Clay Street, Suite 1400,
Oakland, CA 94612
Leroy Griffin, 1605 Martin Luther King, Oakland, CA 94612
William Wick, Crosby, Heafey, Roach, & May, 1999 Harrison Street,
Oakland, CA 94612-3573
Ariu Levi, Chief, Alameda County Environmental Health, Hazardous Materials
Division
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

February 16, 2000

Mr. Charles A. Sumner II
Vice President – Development & Asset Management
Prentiss Properties (Property owner of 1750 Webster Street)
2485 Natomas Park Drive, Suite 350
Sacramento, CA 95833

Mr. Leland Douglas
Douglas Parking LLC (Property owner of 1721 Webster Street)
1721 Webster Street
Oakland, CA 94612-3411

RE: STID 4617, 1750 Webster Street, Oakland, CA 94612

Dear Messrs. Sumner & Douglas:

I have reviewed the site file for the above address for the purpose of determining whether the subsurface contamination at the above site is from an on-site or off-site source. In summary, the following information is contained in the County's file. The site and site vicinity have generally been developed since at least 1899. The site was used for residential purposes until at least 1936 based on the Reverse Business Directory. Since 1936, the site has been used for a parking lot.

A geophysical survey and groundwater investigation was performed at the site in March 1993. No underground storage tank (UGT) were identified by the geophysical survey, but the two groundwater samples collected (HP-1 and HP-2) had concentrations of total petroleum hydrocarbons as gasoline (TPH-g), and the gasoline related compounds benzene, toluene, ethylbenzene, and total xylenes (BTEX).

In May 1993, a geophysical survey and a follow-up investigation was performed which included advancing four soil borings to depths of approximately 20 feet below ground surface (bgs). Two samples were analyzed from each boring. No significant concentrations of TPH(g) or BTEX were detected in any of the soil samples. No USTs were identified by the geophysical survey.

Mr. Charles A. Sumner II
Prentiss Properties
2485 Natomas Park Drive, Suite 350
Sacramento, CA 95833
Page 2 of 4
February 9, 2000

A subsurface investigation that involved the advancement of twelve soil borings and ground penetrating radar (GPR) survey was performed in February 1998. Groundwater was detected at a depth of approximately 20 feet bgs. None of the soil samples collected from above that depth had detectable concentrations of TPH(g), BTEX or MTBE. All of the ground water samples did have detectable concentrations of TPH(g), BTEX and MTBE, and three had detectable concentrations of HVOCs. Groundwater had up to 760,000 ppb TPH(g), 10,000 ppb benzene, 29,000 ppb toluene, 5,800 ppb ethylbenzene, 17,500 ppb total xylenes.

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The first quarter 1999 groundwater monitoring event completes a full year of quarterly groundwater monitoring at the site. The groundwater gradient has been consistent northeasterly at the site. None of the contaminants have been detected in the vadose zone soils in any of the 18 soil borings completed.

Based on information currently available to this office and the Regional Water Quality Control Board, San Francisco Bay Region (RWQCB), we conclude that groundwater pollution detected beneath the subject property is likely the result of the migration of pollutants in groundwater from upgradient sites. In general, this office and RWQCB does not pursue enforcement action against a property owner whose land overlies contaminated groundwater if that contamination is solely the result of the migration of groundwater contaminants from an off-site source (possibly 1721 Webster Street) or sources. Accordingly, this office and RWQCB will not name current and future owners of the subject property as dischargers with respect to groundwater pollution from off-site

Mr. Charles Sumner II
Prentiss Properties
2485 Natomas Park Drive, Suite 350
Sacramento, CA 95833
February 9, 2000
Page 3 of 4

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The site is currently a parking lot, and the proposed development plan is to erect an aboveground, non-enclosed parking structure. The groundwater beneath the site has been impacted with petroleum constituents. The soil has not been significantly impacted. Versar, Inc. prepared a risk based corrective action assessment (February 23, 1998) only evaluating groundwater. This office concurs with Versar's conclusion that the presence of petroleum constituents within the shallow groundwater does not represent a health concern that will restrict the development of the site as a parking (non-enclosed) structure. However, it is anticipated that any parking structure built on the site would contain some environments which will be more representative of indoor exposures (i.e.- toll booth, maintenance closets). The site specific target levels derived for benzene in groundwater under the indoor exposure scenario was determined to be 1.1 ppm. Currently the highest concentration of benzene in the site groundwater is 14 ppm.

A risk assessment evaluating the "indoor exposure pathway" must be submitted to the local implementing agency for review and approval if any enclosed structure is proposed for the site.

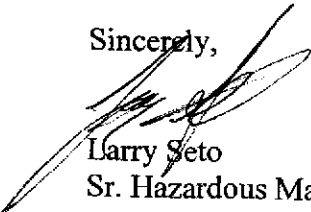
A deed restriction on the site needs to be recorded to ensure the site is re-evaluated if site use changes.

The three monitoring wells on-site, A-1, A-2 and A-3 should not be destroyed. The monitoring well covers must be locked at all times to prevent vandalism. The responsible party for the plume beneath your property can use these wells for future monitoring.

If you have any questions, please contact this office at (510) 567-6774.

Mr. Charles A. Sumner II
Prentiss Properties
2485 Natomas Park Drive, Suite 350
Sacramento, CA 95833
Page 4 of 4

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Chuck Headlee, Regional Water Control Board, 1515 Clay Street, Suite 1400,
Oakland, CA 94612
Leroy Griffin, 1605 Martin Luther King, Oakland, CA 94612
William Wick, Crosby, Heafey, Roach, & May, 1999 Harrison Street,
Oakland, CA 94612-3573
Ariu Levi, Chief, Alameda County Environmental Health, Hazardous Materials
Division
Files



State Water Resources Control Board



Division of Clean Water Programs

2014 T Street • Sacramento, California 95814 • (916) 227-2120
Mailing Address: P.O. Box 944212 • Sacramento, California 94424-2120
FAX (916) 227-4530 • Internet Address: <http://www.swrcb.ca.gov/~cwphome/ustef>

99 DEC -7 AM 9:59

Winston H. Hickox
Secretary for
Environmental
Protection

November 30, 1999

cc
Mr. Lee Douglas
Douglas Parking
1721 Webster Street
Oakland, CA 94612

PRE-APPROVAL OF CORRECTIVE ACTION COSTS, CLAIM NO. 8988, SITE ADDRESS: 1721 WEBSTER STREET, OAKLAND

I have reviewed your request, received on November 4, 1999 for pre-approval of corrective action costs; I will place these documents in your file for future reference. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective action costs.

With the following provisions, the **total cost pre-approved** as eligible for reimbursement, is **\$15,562.00**. The cost proposal for this work by Cambria is approved for eligible costs as submitted.

In an effort to expedite future reimbursement requests associated with the implementation of these pre-approved tasks, we request that the attached budget tracking form be completed/updated and submitted with the relevant supporting documentation.

Be aware that this pre-approval does not constitute a decision on reimbursement: all reasonable and necessary corrective action costs for work directed and approved by the local regulator will be eligible for reimbursement per the terms of your Letter of Commitment at costs consistent with those pre-approved in this letter.

*All future costs for corrective action must be approved in writing by Fund staff.
Future costs for corrective action must meet the requirements of
Article 11, Chapter 16, Underground Storage Tank Regulations.*

- The actual costs and scope of work performed must be consistent with the pre-approval for it to remain valid.
- The work products must be acceptable to Alameda County Health Care Services (ACHCS).
- If a different scope of work becomes necessary, then you must request pre-approval of costs on the new scope of work.

California Environmental Protection Agency

- Although I have referred to the Cambria proposal in my pre-approval above, please be aware that you will be entering into a private contract: the State of California cannot compel you to sign any specific contract.


I also want to remind you that the Fund's regulations require that you obtain at least three bids, or a bid waiver from Fund staff, from qualified firms for all future necessary corrective action work.

Please remember that it is still necessary to submit the actual costs of the work as explained in the Reimbursement Request Instructions to confirm that the costs are consistent with this pre-approval before you will be reimbursed. ***Please insure that your consultant prepares their invoices to include the required break down of costs on a time and materials basis, that invoiced tasks are consistent with the original proposal, and that reasonable explanations are provided for any changes made in the scope of work or increases in the costs. When the invoices are submitted you must include copies of all:***

- *subcontractor invoices (includes lab invoices)*
- *technical reports, when available, and*
- *applicable correspondence from ACHCS.*

Please call if you have any questions; I can be reached at (916) 227-7883.

Sincerely,



Mark Owens, Water Resources Control Engineer
Technical Review Unit
Underground Storage Tank Cleanup Fund

cc: Mr. Larry Seto, Alameda County Health Care Services, Alameda



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

September 16, 1999

Mr. Lee Douglas
Douglas Parking
1721 Webster Street
Oakland, CA 94612

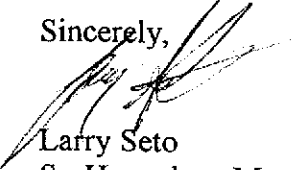
RE: 1721 Webster Street, Oakland, CA 94612

Dear Mr. Douglas:

I have reviewed your Remedial Evaluation and Revised Remedial Workplan dated August 13, 1999 that was prepared by Cambria Environmental. It is acceptable.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,


Larry Seto
Sr. Hazardous Materials Specialist

Cc: Leroy Griffin, City of Oakland, 1603 Martin Luther King, Oakland, CA 94612
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

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

November 24, 1998

Mr. Leland Douglas
Douglas Parking Company
1721 Webster Street
Oakland, CA 94612
STID 4070

RE: Douglas Parking, 1721 Webster Street, Oakland, CA

Dear Mr. Douglas:

I have reviewed your Remedial Work Plan dated November 11, 1998 that was prepared by Cambria Environmental that proposes to inject hydrogen peroxide in monitoring wells MW-2 and MW-3. This is acceptable with the condition that groundwater be sampled on a quarterly basis during this remediation project.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,


Larry Seto
Sr. Hazardous Materials Specialist

Cc: Ron Scheele, Cambria Environmental, 1144 65th Street, Suite B,
Oakland, CA 94608

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

November 24, 1998

Mr. Leland Douglas
Douglas Parking Company
1721 Webster Street
Oakland, CA 94612
STID 4070

RE: Douglas Parking, 1721 Webster Street, Oakland, CA

Dear Mr. Douglas:

I have reviewed your Remedial Work Plan dated November 11, 1998 that was prepared by Cambria Environmental that proposes to inject hydrogen peroxide in monitoring wells MW-2 and MW-3. This is acceptable with the condition that groundwater be sampled on a quarterly basis during this remediation project.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,


Larry Seto
Sr. Hazardous Materials Specialist

Cc: Ron Scheele, Cambria Environmental, 1144 65th Street, Suite B,
Oakland, CA 94608

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



June 29, 1998
STID 4070

Douglas Motor Service
ATTN: Leland Douglas
1721 Webster St.
Oakland, CA 94612

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

Re: 1721 Webster St., Oakland, CA 94612

Dear Leland Douglas:

This office received and reviewed a Groundwater Monitoring Report for the above site by Cambria dated March 6, 1998. The following comments pertain to this report:

1. It is acknowledged that you are on a semi-annual monitoring schedule.
2. It is apparent that levels of contamination are dropping and that MW-2 is the remaining well where contamination is significant, although MW-3 and MW-4 still contaminated with TPHg.
3. This office agrees with the anticipated future activities page 2 for this site.

If you have any questions please call this office at (510) 567-6782.

Sincerely,

Thomas F. Peacock, Manager
Hazardous Material Division

c: Dick Pantages Chief - **Files**
Bob Clark-Riddell, Cambria Environmental Technology Inc.,
1144 65th St., Suite B, Oakland, CA 94608
LeRoy Griffin, City of Oakland Hazardous Materials



Cal/EPA

**State Water
Resources
Control Board**

**Division of
Clean Water
Programs**

**Mailing Address:
P.O. Box 9444212
Sacramento, CA
94244-2120**

**2014 T Street,
Suite 130
Sacramento, CA
95814
(916) 227-4307
FAX (916) 227-4530**

**World Wide Web
http://www.swrcb.ca.
gov/~cwphome/
fundhome.htm**



**Pete Wilson
Governor**

JUL 16 1997

#4070
fe

Leland Douglas
Douglas Parking Company
1721 Webster St
Oakland, CA 94612

Site ID 4070

**UNDERGROUND STORAGE TANK CLEANUP FUND, CLAIM NO. 8988, FOR SITE
ADDRESS: 1721 WEBSTER ST, OAKLAND 94612**

The State Water Resources Control Board (State Board) is able to issue, pursuant to applicable regulations, the enclosed Letter of Commitment (LOC) in an amount not to exceed \$40,000. This LOC is based upon our review of the corrective action costs you reported to have incurred to date. The LOC may be modified by the State Board.

It is very important that you read the terms and conditions listed in the enclosed LOC. Claims filed with the Underground Storage Tank Cleanup Fund far exceed the funding available and it is very important that you make use of the funding that has been committed to your cleanup in a timely manner.

Consequently, if you do not submit your first reimbursement request for corrective action costs which you have incurred within ninety (90) calendar days from the date of this letter, your funds will automatically be deobligated. Once deobligated, any future funds for this site will be obligated subject to availability of funds at such time when we receive your reimbursement request.

You are reminded that you must comply with all regulatory agency time schedules and requirements and you must obtain three bids for any required corrective action. Only corrective action costs *required* by the regulatory agency to protect human health, safety and the environment can be claimed for reimbursement. **Unless waived in writing, you are required to obtain preapproval of costs for all future corrective action work (form enclosed).** If you have any questions on obtaining preapproval of your costs or the three bid requirement, please call Steve Marquez, our engineer assigned to claims in your Region, at (916) 227-0746. Failure to obtain preapproval of your future costs may result in the costs not being reimbursed.

The following documents needed to submit your reimbursement request are enclosed:

- "Reimbursement Request Instructions" package. **Retain this package for future reimbursement requests.** These instructions must be followed when seeking reimbursement for corrective action costs incurred after January 1, 1988. Included in the instruction package are samples of completed reimbursement request forms and spreadsheets.

7 JUL 18 PM 2:41
ENVIRONMENTAL
PROTECTION
DIVISION



Recycled Paper

Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.

JUL 16 1997

- "Bid Summary Sheet" to list information on bids received which **must be completed and returned.**
- "Reimbursement Request" forms which you **must use to request reimbursement of costs incurred.**
- "Spreadsheet" forms which you **must use in conjunction with your reimbursement request.**
- "Claimant Data Record" (Std. Form 204) which **must be completed and returned with your first reimbursement request.**

We continuously review the status of all active claims. If you do not submit a reimbursement request or fail to proceed with due diligence with the cleanup, we will take steps to withdraw your LOC.

If you have any questions regarding the enclosed documents, please contact Anna Torres at (916) 227-4388.

Sincerely,



Dave Deaner, Manager
UST Cleanup Fund Program

Enclosures

cc: Mr. Thomas Peacock
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Alameda County
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577

CC4580

September 17, 1996
STID 4070
page 1 of 2

Attn: Leland Douglas
Douglas Motor Service
1721 Webster St.
Oakland CA 94612

re: Douglas Parking Co., 1721 Webster St., Oakland CA 94612

Dear Mr. Douglas,

This office is in receipt of the "Subsurface Investigation Report," prepared by Cambria, dated 7/16/96. **Note that once again your cover letter was not attached.** This report documents the drilling of seven Geoprobe borings (February 1996) and the subsequent installation of two monitoring wells (May 1996) in Webster St. Soil and groundwater samples were collected. The report also documents the disposal of ten 55-gallon drums containing steam clean rinseate, purge water, and soil cuttings generated during previous and current subsurface investigations.

Results from this investigation indicate that soil was contaminated with (up to 660 mg/kg) TPH-gasoline (benzene was ND) in the vicinity of the former USTs (approximately 80' downgradient and approximately 40' crossgradient of the former USTs). Grab groundwater samples indicate a hydrocarbon plume extending approximately 150' downgradient and at least 50' crossgradient from the former USTs. Groundwater generally flows Northeast at this site.

Note that although crossgradient well MW4 was ND for benzene, it contained 14,000 ppb TPH-g, as well as 1,200 ppb toluene, 720 ppb ethylbenzene, and 3,100 ppb xylenes. The crossgradient extent of the plume has not been fully defined. However, the adjacent property owner (1750 Webster St.) will be receiving a letter from this office shortly, requesting further investigation.

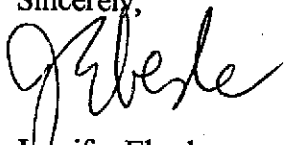
Until further notice, the wells should be monitored and sampled biannually (first and third quarters). MW1 need not be sampled any longer, due to the ND concentrations for four quarters, and its upgradient location.

If you have any questions, please contact me at 510-567-6700, ext 6761; our fax number is 510-337-9335. Feel free to submit reports on double-sided paper in order to save precious trees.

**Please submit a cover letter with your consultant's reports,
and please remember to sign it.**

September 17, 1996
STID 4070
page 2 of 2
Attn: Leland Douglas

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney's Office
John Espinoza, Cambria, 1144-65th St., Suite C, Oakland CA 94608
Tom Peacock
Jennifer Eberle/file

je.4070-E

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

ARNOLD PERKINS, DIRECTOR

DAVID J. KEARS, Agency Director
February 2, 1996
STID 4070

ALAMEDA COUNTY CC4580
ENVIRONMENTAL HEALTH SERVICES
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

Attn: Leland Douglas
Douglas Motor Service
1721 Webster St.
Oakland CA 94612

re: Douglas Parking Co., 1721 Webster St., Oakland CA 94612

Dear Mr. Douglas,

This office is in receipt of the "Proposed Subsurface Investigation Workplan," prepared by Cambria, dated 1/26/96. Note that this office did NOT receive a cover letter from you. This workplan involves the installation of up to five Geoprobe borings in Webster St. Soil and grab water samples will be collected. Subsequent to this task, a site map will be submitted to this office which indicates the location(s) of groundwater monitoring well(s) to be installed in the downgradient direction. **This workplan is acceptable for implementation, with the understanding that well location(s) will be approved by this office prior to well placement.**

Please note that all wells should be monitored and sampled during the first quarter 1996, which ends 3/31/96. If the new well(s) have not been installed and developed prior to that date, the existing 3 wells should be sampled anyway. The reason is to gather and compare data during the high groundwater season. This is usually the time of year the concentrations of contaminants are at their maximum.

If you have any questions, please contact me at 510-567-6700, ext 6761; our fax number is 510-337-9335. Feel free to submit reports on double-sided paper in order to save precious trees. **Kindly submit a cover letter with your consultant's reports, and please remember to sign it.**

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney's Office
John Espinoza, Cambria, 1144-65th St., Suite C, Oakland CA 94608
Tom Peacock
Acting Chief/file

bc

je.4070-D

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

January 19, 1996

STID 4070

Attn: Leland Douglas
Douglas Motor Service
1721 Webster St.
Oakland CA 94612

ALAMEDA COUNTY CC4580
ENVIRONMENTAL HEALTH SERVICES
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

re: **SECOND NOTICE OF VIOLATION**
Douglas Parking Co., 1721 Webster St., Oakland CA 94612

Dear Mr. Douglas,

Our last letter to you, dated 8/23/95, requested a workplan for further subsurface investigation, within 45 days. You appealed that request to the State Water Resources Control Board (SWRCB) by (unsigned) letter dated 10/6/95. The SWRCB denied your request by letter dated 10/18/95. You re-appealed their denial by (unsigned) letter dated 10/25/95. The SWRCB again denied your request by letter dated 11/3/95.

Since that time, we have not received any response to our original request for a workplan. This letter is a "Second NOV" because a prior NOV was sent to you, dated 4/17/95. You are currently in violation of the California Health & Safety Code, California Water Code, and California Code of Regulations as follows.

"No person shall close an underground tank system unless that person . . . demonstrates to the appropriate agency . . . that the site has been investigated to determine if there are any present, or were past releases, and if so, that appropriate corrective or remedial actions have been taken," as per Section 25298 (c) (4) of the California Health & Safety Code, (CH&SC) Division 20, Chapter 6.7. Further, "any operator of an underground tank system shall be liable for a civil penalty of not less than five hundred dollars (\$500) or more than five thousand dollars (\$5,000) for each underground storage tank for each day of violation for. . . failure to properly close an underground tank system," as per Section 25299 (a) (5) of CH&SC, Division 20, Chapter 6.7.

"Until investigation and cleanup are complete, the owner or operator shall submit reports to the local agency, . . . every three months or more frequently as specified by the agency," as per Section 2652 (d) of California Code of Regulations (CCR), Title 23, Div. 3, Ch. 16.

You are requested to perform a Soil and Water Investigation (SWI), as per Sect. 2724 of Chapter 16, Division 3, Title 23, California Code of Regulations. Rapid site assessment methods (i.e. cone penetrometer testing, geoprobe, hydropunch, etc.) are suggested to qualitatively assess impacts and to define the extent of the contaminant plume, as a first step of the SWI. The SWI may be used to later implement corrective action, as per a Corrective Action Plan, as defined in Sect. 2726 of Chapter 16, Division 3, Title 23, California Code of Regulations.

January 19, 1996
STID 4070
Attn: Leland Douglas
page 2 of 2

Therefore, you are requested to submit a workplan for a SWI, within 30 days, or by February 19, 1996. You have already had over 2 months to prepare the SWI workplan, from the time the SWRCB issued its last denial to your request. All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; and b) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted **under seal** of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.


Quarterly groundwater monitoring and sampling should continue. Please continue to include potentiometric surface maps and gradients. The last quarterly report received for this site was for sampling conducted on 7/11/95; the report was prepared by Cambria, and dated 7/24/95. **You have apparently missed sampling the last quarter of 1995. You must continue sampling starting with the first quarter of 1996.**

If you have any questions, please contact me at 510-567-6700, ext 6761; our fax number is 510-337-9335. **Feel free to submit reports on double-sided paper in order to save precious trees. Kindly submit a cover letter with your consultant's reports, and please remember to sign it.**

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney's Office
John Espinoza, Cambria, 1144-65th St., Suite C, Oakland CA 94608
Tom Peacock
 Acting Chief/file

je.4070-C

STATE WATER RESOURCES CONTROL BOARD

DIVISION OF CLEAN WATER PROGRAMS

2014 T STREET, SUITE 130
P.O. BOX 944212
SACRAMENTO, CA 94244-2120



(916) 227-4325
FACSIMILE (916) 227-4349

NOV 03 1995

Leland Douglas
Douglas Parking Company
1721 Webster Street
Oakland, CA 94612

Dear Mr. Douglas:

UNDERGROUND STORAGE TANK (UST) LOCAL OVERSIGHT PROGRAM, SITE NO.
4070, ALAMEDA COUNTY

This is in response to your letter dated October 25, 1995 where you ask us to reconsider our decision not to accept your petition submitted on October 6, 1995. Your request is based on the fact that your consultant, Cambria Environmental Technology, Inc., discussed the site with Tom Peacock of the County on two occasions prior to submittal of your petition. Mr. Peacock has confirmed that he did speak with your consultant, however, he in no way conveyed the message that he was willing to reconsider the County's decision to require additional site investigation. Therefore, we must stand by our initial decision to not accept your petition.

If you have any questions, please telephone me at (916) 227-4325.

Sincerely,

A handwritten signature in cursive script that reads "Lori Casias".

Lori Casias
Local Oversight Program

cc: ✓ Tom Peacock
Alameda County
Hazardous Materials Division
Department of Environmental Health
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA 94502



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DOUGLAS PARKING COMPANY

PARKING CONSULTANTS, MANAGEMENT & LEASING

1721 WEBSTER STREET
OAKLAND, CALIFORNIA 94612

TELEPHONE (510) 444-7412, 444-7352; FAX (510) 452-3654
Oct. 25, 1995

Lori Casias
Local Oversight Program
STATE WATER RESOURCES CONTROL BOARD
P.O. BOX 944212
Sacramento, Ca. 94244

By Fax to: 916-227-4349

Ref.: Site No. 4070
1721 Webster St.
Oakland, Ca. 94612

Dear Ms. Casias,

With reference to the above site and your letter of Oct. 18, 1995, please note that our consultant, Cambria Environmental Technology, Inc. was in discussion with Tom Peacock of ACHCS on Sept. 1st and Sept. 25. The discussions concerned the decision of August 23, 1995 by the County and my concerns about the costs and necessity of additional investigation. Because they finally declined to change their decision, I filed my petition on Oct. 6, 1995. I feel it was timely and within the 30 day limit.

I request that you reconsider your decision and that we be allowed to appeal.

Sincerely,

DOUGLAS PARKING COMPANY

Leland Douglas

LD/lm
cc: Cambria
T. Peacock

**STATE WATER RESOURCES CONTROL BOARD
DIVISION OF CLEAN WATER PROGRAMS**

2014 T STREET, SUITE 130
P.O. BOX 944212
SACRAMENTO, CA 94244-2120



(916) 227-4325
FACSIMILE (916) 227-4349

OCT 18 1995

Leland Douglas
Douglas Parking Company
1721 Webster Street
Oakland, CA 94612

Dear Mr. Douglas:

**UNDERGROUND STORAGE TANK (UST) LOCAL OVERSIGHT PROGRAM, SITE NO.
4070, ALAMEDA COUNTY**

This is in response to the petition submitted on October 6, 1995. The petition is challenging a decision made by the County on August 23, 1995; therefore, we cannot accept your petition as timely filed. A responsible party has 30 days from the date of any action/decision made by a local agency in which to file a petition.

If you have any questions, please telephone me at (916) 227-4325.

Sincerely,

A handwritten signature in cursive script that reads "Lori Casias".

Lori Casias
Local Oversight Program

cc: ✓ Tom Peacock
Alameda County
Hazardous Materials Division
Department of Environmental Health
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA 94502

95 OCT 20 PM 2:05
ENVIRONMENTAL
PROTECTION



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DOUGLAS PARKING COMPANY

PARKING CONSULTANTS, MANAGEMENT & LEASING

1721 WEBSTER STREET
OAKLAND, CALIFORNIA 94612

TELEPHONE (510) 444-7412, 444-7352; FAX (510) 452-3654

October 6, 1995

STATE WATER RESOURCES CONTROL BOARD
P.O. BOX 944212
Sacramento, Ca. 94244-2120

Ref.: 1721 Webster St.
Oakland, Ca.

Dear Sir/Madam,

1. This petition is made for Douglas Parking Company
1721 Webster St.
Oakland, Ca. 94612
2. This petition is requesting that the State Board review the decision of the Alameda County Health Care Services demanding further investigation of subsurface contamination.
3. By letter of August 23, 1995 the local agency (ACHCS) acted. After receiving a review, dated Oct. 3, 1995 from our environmental consultants, and after their discussion with the local agency, we hereby make this petition.
4. The action by the local agency is inappropriate because:
 - a. Gas tanks were removed in August, 1992. *so?*
 - b. Quarterly monitoring has been established and indicates a significant and steady decrease in contamination levels. *false only 3 q's.*
 - c. It seems the local agency wants especially to learn of the extent of the downgradient plume. *and?*
 - d. It makes no practical difference where the extent of this plume is unless someone is going to demand that it be cleaned up. Their demand is for information only. *oh?*
 - e. The local agency is demanding we spend more money (estimated at a minimum of \$11,890) when it is of little value and contrary to what national opinion tells us about foolishly spending the money of small business. *are you? → ?*
 - f. We have already spent more than \$40,000, excluding monitoring activity, to remove tanks and establish three monitoring wells. *apply to fund.*
 - g. We plan to continue monitoring. *good.*

ENVIRONMENTAL PROTECTION
95 OCT 10 PM 3:34



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DOUGLAS PARKING COMPANY

PARKING CONSULTANTS, MANAGEMENT & LEASING

1721 WEBSTER STREET
OAKLAND, CALIFORNIA 94612

TELEPHONE (510) 444-7412, 444-7352; FAX (510) 452-3654

Facsimile Cover Sheet

To: Jennifer Eberle
Company: Alameda County Health Care Services
Phone:
Fax: 337-9335

From: Leland Douglas
Company: Douglas Parking Company
Phone: 510.444.7412
Fax: 510.452.3654

Date: Oct. 5, 1995

**Pages including this
cover page:** 1

Comments:

Ref: STID 4070
1721 Webster St. Oakland

We will be appealing your order of August 23, 1995 to submit a work plan by Oct. 9, 1995. Our appeal will be before the State Water Resources Board. We have sent a request for petition procedures.

cc: Cambria Environmental

5. We are required to expend money needlessly.
6. We request the State Board rescind the demand of the local agency.
7. The petitioner is unaware of legal issues raised in this petition. ?
8. In the interest of time, we are sending this petition now. We shall immediately request from the local agency any other persons having an interest in this subject matter.
9. By copy of this petition, Alameda County Health Care Services and Cambria Environmental Technology, Inc., our consultants, will be notified.
10. We have already faxed a notice to ACHCS explaining that we are requesting this petition.

This petition is being made because we believe the local agency has overlooked some facts and simply wants additional information that is unnecessary or will be obtained from ongoing monitoring.

Although not called for by the petition instructions, we of course have on hand copies of all estimates, costs, dates, and monitoring reports.

Thank you for your consideration.

Sincerely,

DOUGLAS PARKING COMPANY

Leland Douglas

ED/lm
cc: ACHCS
Cambria

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Director

August 23, 1995
STID 4070

Attn: Leland Douglas
Douglas Motor Service
1721 Webster St.
Oakland CA 94612

DEPARTMENT OF ENVIRONMENTAL HEALTH
Environmental Protection Division
1131 Harbor Bay Parkway, #250
Alameda, CA 94502-6577
(510) 567-6700

re: Douglas Parking Co., 1721 Webster St., Oakland CA 94612

Dear Mr. Douglas,

We are in receipt of the "Third Quarter 1995 Monitoring Report," prepared by Cambria, dated 7/24/95. [Please note that the sampling dates (for Gen Tech/Piers Environmental Data) in Table 1 are erroneous. The wells were sampled on 9/21/94 and 2/22/95, not 12/2/94 and 3/6/95. Please make these corrections for future reports. It would also be easier to read data that was tabulated well by well over time, without separation by consultant. Also, groundwater data is usually presented in parts per billion or ppb.]

Although concentrations of groundwater contaminants decreased somewhat this quarter, this may be attributable to the dry summer season. Concentrations generally increase in the wet spring season. The July 1995 concentrations are still significant, particularly in the most downgradient well, MW2. Note that MW2 is located approximately 15' Northeast (and downgradient) from the edge of the closest former 1,000-gallon UST. [Note that Gen Tech's 12/2/94 "Soil and Groundwater Investigation and Quarterly Monitoring Report," Figure 1 appears to have an incorrect scale.] It has been noted that groundwater sampled from boring EB-6, drilled approximately 2' Northeast (and downgradient) from the edge of the closest former 1,000-gallon UST, exhibited concentrations of TPHg and benzene which were an order of magnitude greater than those seen in MW2 ("Soil and Groundwater Investigation and Quarterly Monitoring Report," 12/2/94, Gen-Tech Environmental). **In addition, the gradient is average, in terms of steepness, which indicates a likelihood for offsite, downgradient migration of contaminants.** I measured the gradient at 0.041 ft/ft East-Southeast for the 2/22/95 sampling event. Cambria measured the gradient at 0.007 ft/ft Northeast for the 7/11/95 sampling event. **The downgradient edge of the groundwater contaminant plume remains unknown.** For these reasons, further investigation is warranted in the downgradient direction.

Therefore, you are requested to submit a workplan for further subsurface investigation, within 45 days, or by October 9, 1995. All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; and b) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted **under seal** of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. **Kindly submit a cover letter with your consultant's reports.**

August 23, 1995
STID 4070
Attn: Leland Douglas
page 2 of 2

In the course of writing this letter, I contacted Piers Environmental and Cambria for information on groundwater gradient and direction. I received a transmittal from Cambria, dated 8/20/95, and two faxes from Piers, dated 8/18 and 8/21/95. There were two well survey reports included in these transmittals: one dated 11/20/94 (done for Gen-Tech), and one dated 6/28/95 (done for Cambria).

Quarterly groundwater monitoring and sampling should continue. Please continue to include potentiometric surface maps and gradients.

If you have any questions, please contact me at 510-567-6700, ext 6761; our fax number is 510-337-9335. **Feel free to submit reports on double-sided paper in order to save precious trees.**

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney's Office
John Espinoza, Cambria, 1144-65th St., Suite C, Oakland CA 94608
Stuart Solomon, Piers, 3131 S. Bascom Ave., Suite 5, Campbell CA 95008
Tom Peacock
Leroy Todd/file

je.4070-A

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Director

August 21, 1995
STID 4070

Stuart Solomon
Piers Environmental
2242 Camden Av., suite 202
San Jose CA 95124

DEPARTMENT OF ENVIRONMENTAL HEALTH
Environmental Protection Division
1131 Harbor Bay Parkway, #250
Alameda, CA 94502-6577
(510) 567-6700

RE: Douglas Parking, 1721 Webster St., Oakland CA 94612

Dear Mr. Solomon,

Thank you for your fax dated 8/18/95, which included a copy of the well survey plat and report, dated 11/20/94. The surveyor took two sets of elevations: one for the "top of handhole," and one for "PVC casing."

Your 3/6/95 quarterly report has some information which I do not understand. I am referring to Table 1 on page 2. The column titled "depth" is confusing--depth to what?--depth of what? These "depths" do not correlate with the well construction logs for total well depth. These "depths" are also inconsistent with each other--note that MW3 has nearly twice the "depth" of MW1. **Please clarify what these "depths" are.**

In addition, the column titled "casing elev ft" is also confusing. The elev for MW1 (29.73') correlates with the "top of handhole" elevation from the surveyor. However, the elev for MW2 and MW3 (27.10' and 29.25') correlate with the "PVC casing" elevations from the surveyor. Your field logs in Appendix A do not indicate from which elevation that the depths to water were taken. **Please clarify this matter.**

For future reference, standard protocol is three columns: TOC, DTW, and GWE. These questions are being directed to you (Piers) because you are the only party who can answer them, since you were in the field. Only the field technician knows from where she or he took the DTW measurements. I understand that you no longer are under contract to Douglas Parking. **I would appreciate a prompt response to this matter.**

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Leland Douglas, 1721 Webster St., Oakland CA 94612
Leroy Todd/file

je.4070-B

facsimile
TRANSMITTAL

to: Jennifer Eberle
fax #: (510) 337-9335
re: Douglas Parking Corrections
date: August 21, 1995
pages: 2, including this cover sheet.

Dear Jennifer,

Yes, there were indeed typo errors in our report. Please replace page 2 of our report with the following page.

The title "Depth" refers to the total depth of the well - measured from the TOC to the bottom of the well.

Depth to water is always measured to the top of the well casing (please refer to field sheets).

With the exception of the typo errors, all other data (including field notes and gradient) has been checked, and found to be correct and correlative.

Please accept my apologies for this oversight, and your confusion. Typos can, at times, cause aggravation when trying to make sense out of something that cannot be made sense of. I hope this response is prompt enough for you. You may, of course, direct any correspondence that you like to PIERS when our work is in question - regardless of whether or not we are in contract with a client. Please do not hesitate to call me if you have further questions.

Very truly yours,



Stuart G. Solomon

cc: Leland Douglas - by Fax

From the desk of...

Stuart G. Solomon
President
PIERS Environmental Services, Inc.
3131 S. Bascom Ave. Suite 5
Campbell, CA 95008

(408) 559-1248
Fax: (408) 559-1224

changes

Table 1. Monitoring Well Sampling Data

Well No.	Depth	Depth to Water	Casing Elev. ft.*	Damage	Floating Product
MW-1	26.78	20.69	29.50	None	None
MW-2	27.19	18.49	27.10	None	None
MW-3	28.17	20.09	29.25	None	None

- Elevation in feet above or below MSL, City of Oakland Datum.

The samplers proceeded to purge well volumes (a calculation was done for each well following depth to water sounding measurements) of groundwater from the well using a disposable bailer. The well was then allowed to re-charge. Between each well volume, conductivity, pH, and water temperature readings were obtained and noted on the **Groundwater Sampling Information Sheets (see Appendix A)**. Once the stabilization of the readings were noted the sample was collected from the well. Purge water was stored on-site in barrels. The well sampling information sheet containing data on temperature, conductivity, pH, depth to water, and well volumes purged can be found in **Appendix A**. The legal chain-of-custody and a the Laboratory Analysis Results can be found in **Appendix B**.

A new disposable bailer was used to obtain each well groundwater sample which was placed in (2) 40ml vov clear glass bottles leaving no headspace, and immediately placed on ice for shipment to Hull Development Labs, Inc. in San Jose, California (a **State Certified Testing Lab**) under a legal chain-of-custody.

Hull Labs tested the groundwater samples using EPA Methods 8015M and 8020 for Total Petroleum Hydrocarbons as Gasoline (TPHg), Benzene, Toluene, Ethylbenzene and Xylene (BTEX).

Groundwater Gradient

Groundwater elevation contours were plotted from the measurements, to a known datum. The groundwater flow direction was measured and a gradient calculated. The regional groundwater flow gradient is generally north westerly. Measured gradient is represented on **Figure 1** attached hereto.

ANALYTICAL LABORATORY RESULTS

The analytical results of the groundwater samples revealed the following (see **Table 2**);



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DOUGLAS PARKING COMPANY

PARKING CONSULTANTS, MANAGEMENT & LEASING

1721 WEBSTER STREET
OAKLAND, CALIFORNIA 94612

TELEPHONE (510) 444-7412, 444-7352; FAX (510) 452-3654

ENVIRONMENTAL
PROTECTION

95 MAY -5 PM 12:41

May 4, 1995

Thomas Peacock, Supervising HMS
ALAMEDA COUNTY HEALTH CARE SERVICE
1131 Harbor Bay Parkway
Alameda, Ca. 94502

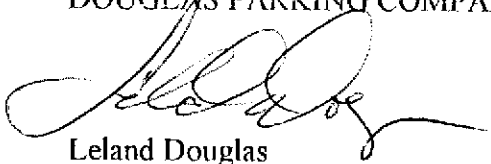
Ref: STID 4070

Dear Mr. Peacock,

With reference to your letter of April 27, 1995, I enclosed copy of my letter of Feb. 8, 1995.

Sincerely,

DOUGLAS PARKING COMPANY



Leland Douglas

LD/im

February 8, 1995

Edgar Howell
ALAMEDA COUNTY ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, Ca. 94502

Ref.: STID 4070
1721 Webster St. - Oakland

Dear Mr. Howell,

Reference is made to Dec. 23, 1994 letter from Thomas Peacock, copy enclosed. We strongly object to paragraph 2 on the grounds that it ignores many other facts contained in prior submitted reports. The assumption is arbitrary and unfounded. Direction to continue investigation, especially across street, is unfair and unnecessary.

We plan to continue quarterly groundwater monitoring. In the meantime, a meeting to discuss the above is requested.

Sincerely,

DOUGLAS PARKING COMPANY

Leland Douglas

LD/lm
encl.

cc: Stuart Solomon

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

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

April 27, 1995
STID 4070

Douglas Motor Service
ATTN: Leland Douglas
1721 Webster St.
Oakland, CA 94612

Re: 1721 Webster St., Oakland, CA 94612

Dear Leland Douglas:

This office received and reviewed a Groundwater Monitoring Report for the above site by PIERS Environmental Services dated March 6, 1995. The following comments pertain to this report:

1. The levels of contamination affirm the requirement for further investigation at this site.
2. This office agrees with the recommendation on page 3 to continue the quarterly groundwater monitoring program at this site.

You are again directed to submit a workplan for further investigation to this office within 30 days, as mentioned in the letter of April 17, 1995.

If you have any questions please call this office at (510) 567-6782.

Sincerely,

Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: Bill Reynolds, Acting Chief - Files
Stuart Solomon, 1936 Camden Ave., Suite 1, San Jose, CA
95124
Gil Jensen, Alameda County District Attorney's Office

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

April 17, 1995
STID 4070

Douglas Motor Service
ATTN: Leland Douglas
1721 Webster St.
Oakland, CA 94612

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

Re: 1721 Webster St., Oakland, CA 94612

NOTICE OF VIOLATION

Dear Leland Douglas:

This office received and reviewed a Soil and Groundwater Investigation and Quarterly Report for the above site by Gen-Tech Environmental dated December 2, 1994. This office also wrote an acceptance for this report which was dated December 23, 1994. In that letter you were directed to submit a workplan for further investigation to this office within 30 days. To date, **no workplan has been submitted.**

You are also required to do quarterly groundwater monitoring and to submit quarterly reports of your activities on the site to this office. **No report has been submitted to this office since December 2, 1994.**

You are again directed to submit a workplan for further investigation as well as to submit a quarterly report of groundwater monitoring to this office within 30 days.

If you have any questions please call this office at (510) 567-6782.

Sincerely,

A handwritten signature in cursive script that reads "Thomas F. Peacock".

Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: Ariu Levi, Acting Chief - Files
Stuart Solomon, 1936 Camden Ave., Suite 1, San Jose, CA
95124
Gil Jensen, Alameda County District Attorney's Office

Douglas Parking - Webster St.

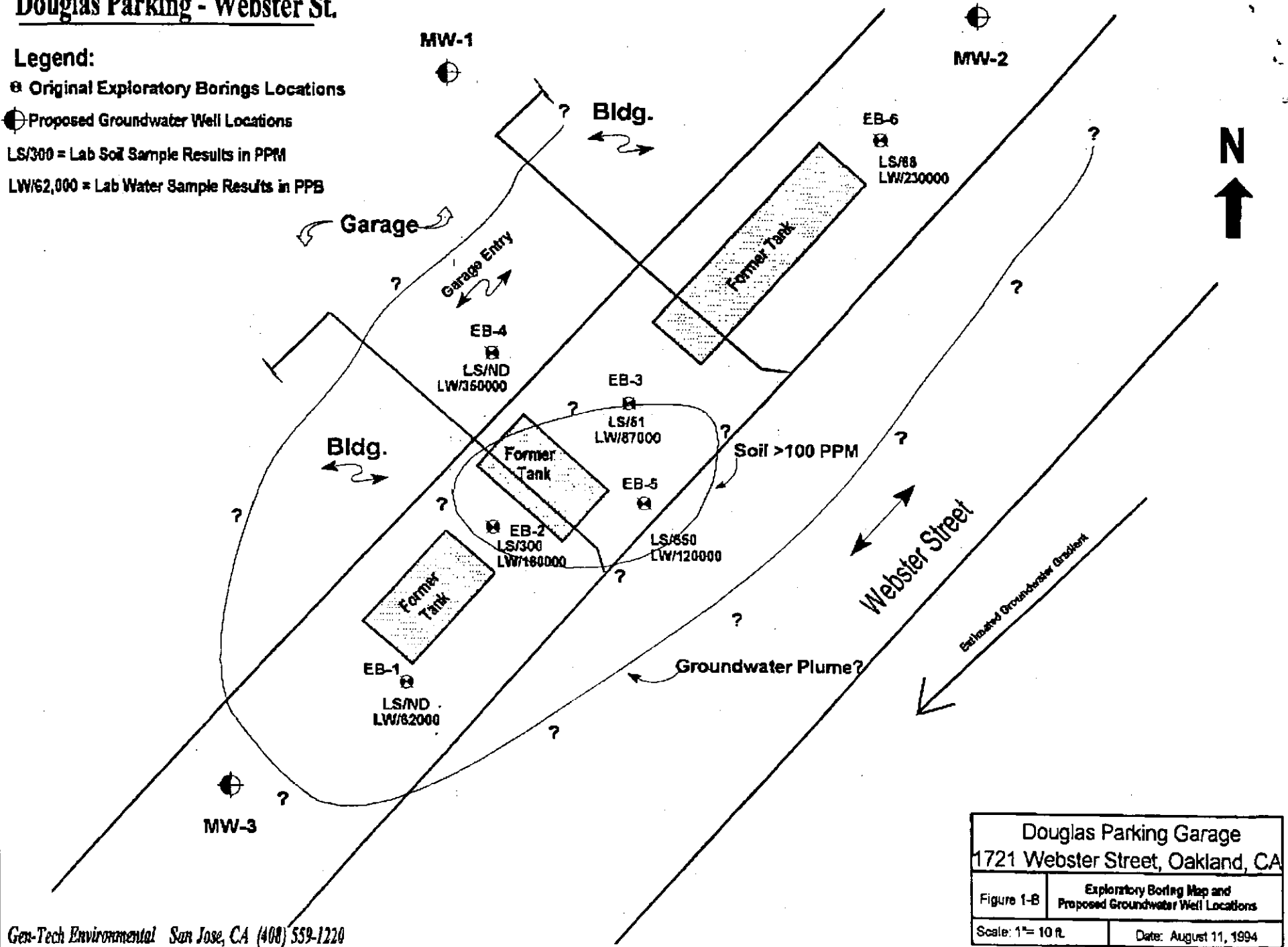
Legend:

⊗ Original Exploratory Borings Locations

⊕ Proposed Groundwater Well Locations

LS/300 = Lab Soil Sample Results in PPM

LW/62,000 = Lab Water Sample Results in PPB



Douglas Parking Garage 1721 Webster Street, Oakland, CA	
Figure 1-B	Exploratory Boring Map and Proposed Groundwater Well Locations
Scale: 1" = 10 ft.	Date: August 11, 1994

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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

June 22, 1994
STID 4070

Douglas Motor Service
ATTN: Leland Douglas
1721 Webster St.
Oakland, CA 94612

Re: 1721 Webster St., Oakland, CA 94612

Dear Leland Douglas:

This office has received and reviewed the Proposed Exploratory Boring and Monitoring Well Installation Workplan, with attachments, for the above site by Gen-Tech Environmental dated June 8, 1994. The plan was reviewed by this office and found to be acceptable. Please contact this office at least 48 hours prior to implementation of the field work.

If you have any questions please call this office at (510) 271-4530.

Sincerely,

A handwritten signature in cursive script that reads "Thomas F. Peacock".

Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: Edgar B. Howell, Chief - Files
Stuart Solomon, 1936 Camden Ave., Suite 1, San Jose, CA
95124

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



01-0151 cd
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

Leland Douglas
Douglas Parking Co.
1721 Webster St.
Oakland, CA 94612

STID 4070, Douglas Parking Co.

RE: Legal Request for Submittal of a Technical Report Resulting from the Alameda County Department of Environmental Health's Enforcement Panel Meeting of June 21, 1994.

Dear Sir:

It has been brought to my attention by Regional Board staff that a condition of soil and ground water pollution exists on your property from an underground storage tank release. The Alameda County Department of Environmental Health (ACHD) staff have requested technical reports from you to fulfill your obligations per California Code of Regulations, Title 23, Waters, Chapter 16, Underground Storage Tank Regulations, Article 11, Corrective Action Requirements. It is my understanding that ACHD staff were unsuccessful in eliciting your co-operation in resolving these issues through normal correspondence.

A Pre-Enforcement Review Panel was held at the ACHD Offices on June 21, 1994, attended by Kevin Graves, of my staff. Pursuant to the Regional Board's authority under Section 13267(b) of the California Water Code, you are hereby required to submit a technical report to address soil and groundwater by August 22, 1994. This technical report should specifically address the following numbered items:

- 1) A proposal to define the lateral and vertical extent of pollution in soil and groundwater;
- 2) A report of exploratory boring and monitoring well installation.

All proposed work should adhere to the requirements articulated in The Tri-Regional Board Staff Recommendations for the Preliminary Evaluation and Investigation of Underground Storage Tank Sites - 8/10/90 and Article 11 of Title 23, Waters, California Code of Regulations.

Enforcement Panel Meeting June 21, 1994

Page 2 of 2

I am hereby transmitting this request for a technical report to ACHD for service and continued case handling. You should be aware that failure on your part to submit the requested technical reports, or a submittal received after the date specified in this request may result in fines up to \$1,000 per day of delinquency. Your response to this technical report request should be sent to Thomas Peacock, at ACHD. Please inform Thomas Peacock at least three working days in advance of all field activities.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the Alameda County Department of Environmental Health, Hazardous Materials Division.

If you have any questions regarding the contents of this letter, please contact Thomas Peacock, of ACHD, at (510) 271-4530.

Sincerely,

Steven R. Ritchie
Executive Officer

cc: Gil Jensen, Alameda County District Attorney's Office,
Consumer & Environmental Protection Division.
Thomas Peacock, Supervising Haz Mat Specialist, ACHD.

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :)
STID 4070)
1721 Webster St.)
Oakland, CA 94612)

Notice of
Pre-Enforcement
Review Panel

Notice is hereby given that upon the motion of the Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board a **Review Panel** will convene on June 21, 1994 at 10:30 a.m. in the offices of the Alameda County Hazardous Materials Division located at 80 Swan Way, Room 200, Oakland, CA 94621. This **Review Panel** will convene for the purpose of determining responsible parties as well as appropriate closure, site assessment, clean-up and mitigation of contamination at the above location.

The Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board have named and served notice of this **Review Panel** on the following persons or entities as having proposed responsibility for closure, site assessment, clean-up and mitigation of contamination at the above location, and by this notice all parties named herein are informed of the right to appear and show cause, if any they have, for the exclusion or inclusion of any of the parties served herein from said responsibility or obligations:

1. Leland Douglas

(name)

1721 Webster St., Oakland, CA 94612

(address)

Dated: June 6, 1994

 (signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :)
STID 4070)
1721 Webster St.)
Oakland, CA 94612)
_____)

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 (signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :

STID 4070

1721 Webster St.

Oakland, CA 94612

) Proof of Service of
) Notice of
) Pre-Enforcement
) Review Panel

I Thomas Peacock, do hereby certify

that I served Leland Douglas

with a copy of the attached Notice of Pre-Enforcement Review

Panel on June 21, 1994 ^{6/6/94} by certified

mailer # P386 338 333

Dated: 6/6/94

Thomas Peacock

(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :)
STID 4070)
1721 Webster St.)
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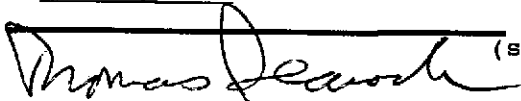
1. **Leland Douglas**

(name)

1721 Webster St., Oakland, CA 94612

(address)

Dated: **June 6, 1994**

 _____
(signature)

61-0151
LI

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

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(signature)

TP #4070

386 338 333



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, June 1991

Sent to Leland Douglas	
Street and No. 1721 Webster St.	
P.O., State and ZIP Code Oakland CA 94612	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date 6/7/94	

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to: **TP #4070**

Leland Douglas
1721 Webster Street
Oakland CA 94612

4a. Article Number
P 386 338 333

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
6/7/94

5. Signature (Addressee)

6. Signature (Agent)
L. Douglas

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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 10, 1994
STID 4070

Douglas Motor Service
ATTN: Leland Douglas
1721 Webster St.
Oakland, CA 94612

Re: 1721 Webster St., Oakland, CA 94612

Dear Leland Douglas:

This office has received and reviewed the Work Plan for Phase II Environmental Assessment for the above site by Piedmont Environmental & Engineering Group dated December 16, 1993. The plan was reviewed by this office and found to be acceptable. Please contact this office at least 48 hours prior to implementation of the field work.

If you have any questions please call this office at (510) 271-4530.

Sincerely,

Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: Edgar B. Howell, Chief - Files
Harry Shin, PE & EG, 2936 Seriana Way, Union City, CA
94587

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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

February 23, 1994
STID 4070

Douglas Motor Service
ATTN: Leland Douglas
1721 Webster St.
Oakland, CA 94612

Re: 1721 Webster St., Oakland, CA 94612

Dear Leland Douglas:

FINAL NOTICE

This office has reviewed the report of the underground storage tank removals performed at the above referenced site on August 3, 1992 and subsequent soil analysis. You were first told of these issues in a letter from this office dated February 22, 1993. You were again told in a Second Notice dated August 17, 1993. Although Harry Shin (a consultant) has spoken with this office several times, to date there has been no action on your part. The following comments are to be considered:

1. The Underground Tank Leak Report you filed was written on a fax copy, which does not allow for distribution. This is being returned. Please submit it completed to this office on the enclosed form as soon as possible.
2. It is clear that the elevated volatile hydrocarbon concentrations (as high as 1,500 ppm TPHg) in soil at the above site requires a soil and groundwater investigation. While we can be sympathetic to your financial condition, the law does not allow us to ignore your site in preference to bigger companies. You are required to begin an investigation, as follows:

I have enclosed the document, Appendix A, Workplan for Initial Subsurface Investigation, a guidance document published by the Regional Water Quality Control Board (RWQCB).

Appendix A is to be used in conjunction with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, the State Water Resources Control Board Leaking Underground Fuel Tank (LUFT) Field Manual, and Article II of Title 23, Calif. Code of Regulations when developing the scope of the Preliminary Site Assessment (PSA) work plan.

1721 Webster St., Oakland, CA 94612
STID 4070
February 23, 1994
Page 2 of 2

Please be advised this office is working in conjunction with the RWQCB to oversee the remediation of hydrocarbon contaminated sites such as these. the RWQCB is the agency entrusted to protect the waters of the state.

You are directed to submit a workplan as described in the above documents to this office within sixty (60) days of this letter.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Be aware that failure to submit the requested documents may subject you to civil liabilities.

If you have any questions please call this office at (510) 271-4530.

Sincerely,



Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: Gil Jensen, Alameda County District Attorney's Office
Edgar B. Howell, Chief - Files

RB# 01-007

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED ? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I HAVE DISTRIBUTED THIS INFORMATION ACCORDING TO THE DISTRIBUTION SHOWN ON THE INSTRUCTION SHEET ON THE BACK PAGE OF THIS FORM.		
REPORT DATE 08/31/93		CASE # 4070		SIGNED: <i>Harry H. Shin</i> DATE: 9-8-93		
REPORTED BY	NAME OF INDIVIDUAL FILING REPORT HARRY H. SHIN, P.E.		PHONE (510) 429-0179		SIGNATURE <i>Harry H. Shin</i>	
	REPRESENTING <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OTHER		COMPANY OR AGENCY NAME Piedmont Environmental Services			
RESPONSIBLE PARTY	ADDRESS 2936 Seriana Way, Union City, CA 94587				STATE CA	
	NAME Douglas Motor Service		CONTACT PERSON Leland Douglas		PHONE (510) 444-7412	
SITE LOCATION	ADDRESS 1721 Webster Street, OAKLAND, CA 94612				STATE CA	
	FACILITY NAME (IF APPLICABLE) Douglas Parking Company		OPERATOR Leland Douglas		PHONE (510) 444-7412	
	ADDRESS 1721 Webster Street		CITY OAKLAND		COUNTY ALAMEDA	
IMPLEMENTING AGENCIES	LOCAL AGENCY Alameda County Health Care		CONTACT PERSON Tom Peacock		PHONE (510) 271-4530	
	REGIONAL BOARD RW&CB - S.F. Bay Area		CONTACT PERSON Rich Hiette		PHONE ()	
SUBSTANCES INVOLVED	(1) NAME Gasoline				QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN	
	(2)				<input type="checkbox"/> UNKNOWN	
DISCOVERY/ABATEMENT	DATE DISCOVERED 08/07/93		HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> TANK TEST <input type="checkbox"/> TANK REMOVAL <input checked="" type="checkbox"/> OTHER Letter from the Agency			
	DATE DISCHARGE BEGAN <input checked="" type="checkbox"/> UNKNOWN		METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> REMOVE CONTENTS <input checked="" type="checkbox"/> CLOSE TANK & REMOVE <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> CLOSE TANK & FILL IN PLACE <input type="checkbox"/> CHANGE PROCEDURE <input type="checkbox"/> REPLACE TANK <input type="checkbox"/> OTHER			
	HAS DISCHARGE BEEN STOPPED ? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE 08/03/93					
SOURCE/ CAUSE	SOURCE OF DISCHARGE <input type="checkbox"/> TANK LEAK <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER <input type="checkbox"/> CORROSION <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER					
	CHECK ONE ONLY <input checked="" type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)					
CURRENT STATUS	CHECK ONE ONLY <input checked="" type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED <input type="checkbox"/> POLLUTION CHARACTERIZATION <input type="checkbox"/> LEAK BEING CONFIRMED <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT UNDERWAY <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> REMEDIATION PLAN <input type="checkbox"/> CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> CLEANUP UNDERWAY					
	CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS) <input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> VACUUM EXTRACT (VE) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> VENT SOIL (VS) <input type="checkbox"/> OTHER (OT)					
	COMMENTS					

REGIONAL WATER CONTROL BOARD
 SEP 21 1993
 QUALITY CONTROL

INSTRUCTIONS

EMERGENCY

Indicate whether emergency response personnel and equipment were involved at any time. If so, a Hazardous Material Incident Report should be filed with the State Office of Emergency Services (OES) at 2800 Meadowview Road, Sacramento, CA 95832. Copies of the OES report form may be obtained at your local underground storage tank permitting agency. Indicate whether the OES report has been filed as of the date of this report.

LOCAL AGENCY ONLY

To avoid duplicate notification pursuant to Health and Safety code Section 25180.5, a government employee should sign and date the form in this block. A signature here does not mean that the leak has been determined to pose a significant threat to human health or safety, only that notification procedures have been followed if required.

REPORTED BY

Enter your name, telephone number, and address. Indicate which party you represent and provide company or agency name.

RESPONSIBLE PARTY

Enter name, telephone number, contact person, and address of the party responsible for the leak. The responsible party would normally be the tank owner.

SITE LOCATION

Enter information regarding the tank facility. At a minimum, you must provide the facility name and full address.

IMPLEMENTING AGENCIES

Enter names of the local agency and Regional Water Quality Control Board involved.

SUBSTANCES INVOLVED

Enter the name and quantity lost of the hazardous substance involved. Room is provided for information on two substances if appropriate. If more than two substances leaked, list the two of most concern for cleanup.

DISCOVERY/ABATEMENT

Provide information regarding the discovery and abatement of the leak.

SOURCE/CAUSE

Indicate source(s) of leak. Check box(es) indicating cause of leak.

CASE TYPE

Indicate the case type category for this leak. Check one box only. Case type is based on the most sensitive resource affected. For example, if both soil and ground water have been affected, case type will be "Ground Water". Indicate "Drinking Water" only if one or more municipal or domestic water wells have actually been affected. A "Ground Water" designation does not imply that the affected water cannot be, or is not, used for drinking water, but only that water wells have not yet been affected. It is understood that case type may change upon further investigation.

CURRENT STATUS

Indicate the category which best describes the current status of the case. Check one box only. The response should be relative to the case type. For example, if case type is "Ground Water", then "Current Status" should refer to the status of the ground water investigation or cleanup, as opposed to that of soil. Descriptions of options follow:

No Action Taken - No action has been taken by responsible party beyond initial report of leak.

Leak Being Confirmed - Leak suspected at site, but has not been confirmed.
Preliminary Site Assessment Workplan Submitted - workplan/proposal requested of/submitted by responsible party to determine whether ground water has been, or will be, impacted as a result of the release.
Preliminary Site Assessment Underway - implementation of workplan.
Pollution Characterization - responsible party is in the process of fully defining the extent of contamination in soil and ground water and assessing impacts on surface and/or ground water.
Remediation Plan - remediation plan submitted evaluating long term remediation options. Proposal and implementation schedule for appropriate remediation options also submitted.
Cleanup Underway - implementation of remediation plan.
Post Cleanup Monitoring in Progress - periodic ground water or other monitoring at site, as necessary, to verify and/or evaluate effectiveness of remedial activities.
Case Closed - regional board and local agency in concurrence that no further work is necessary at the site.

IMPORTANT: THE INFORMATION PROVIDED ON THIS FORM IS INTENDED FOR GENERAL STATISTICAL PURPOSES ONLY AND IS NOT TO BE CONSTRUED AS REPRESENTING THE OFFICIAL POSITION OF ANY GOVERNMENTAL AGENCY

REMEDIAL ACTION

Indicate which action have been used to cleanup or remediate the leak. Descriptions of options follow:

Cap Site - install horizontal impermeable layer to reduce rainfall infiltration.
Containment Barrier - install vertical dike to block horizontal movement of contaminant.
Excavate and Dispose - remove contaminated soil and dispose in approved site.
Excavate and Treat - remove contaminated soil and treat (includes spreading or land farming).
Remove Free Product - remove floating product from water table.
Pump and Treat Groundwater - generally employed to remove dissolved contaminants.
Enhanced Biodegradation - use of any available technology to promote bacterial decomposition of contaminants.
Replace Supply - provide alternative water supply to affected parties.
Treatment at Hookup - install water treatment devices at each dwelling or other place of use.
Vacuum Extract - use pumps or blowers to draw air through soil.
Vent Soil - bore holes in soil to allow volatilization of contaminants.
No Action Required - incident is minor, requiring no remedial action.

COMMENTS - Use this space to elaborate on any aspects of the incident.

SIGNATURE - Sign the form in the space provided.

DISTRIBUTION

If the form is completed by the tank owner or his agent, retain the last copy and forward the remaining copies intact to your local tank permitting agency for distribution.

1. Original - Local Tank Permitting Agency
2. State Water Resources Control Board, Division of Clean Water Programs, Underground Storage Tank Program, P.O. Box 944212, Sacramento, CA 94244-2120
3. Regional Water Quality Control Board
4. Local Health Officer and County Board of Supervisors or their designee to receive Proposition 65 notifications.
5. Owner/responsible party.

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		FOR LOCAL AGENCY USE ONLY THEREBY CERTIFY THAT I HAVE DISTRIBUTED THIS INFORMATION ACCORDING TO THE DISTRIBUTION SHOWN ON THE INSTRUCTION SHEET ON THE BACK PAGE OF THIS FORM.		
REPORT DATE 01/03/93		CASE # 4070		SIGNED: <i>[Signature]</i> DATE: 9/1/93		
REPORTED BY	NAME OF INDIVIDUAL FILING REPORT HARRY H. SHIN, P.E.		PHONE (510) 429-0177		SIGNATURE <i>[Signature]</i>	
	REPRESENTING <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OTHER		COMPANY OR AGENCY NAME Piedmont Environmental			
ADDRESS 2936 SERIANA Way Union City CA 94587						
RESPONSIBLE PARTY	NAME Douglas Motor Service UNKNOWN		CONTACT PERSON Leland Douglas		PHONE (510) 444-7412	
	ADDRESS 1721 Webster Street ST. OAKLAND CITY CA 94612 STATE ZIP					
SITE LOCATION	FACILITY NAME (IF APPLICABLE) Douglas Parking Company		OPERATOR Leland Douglas		PHONE (510) 444-7412	
	ADDRESS 1721 Webster St. OAKLAND CITY CALIFORNIA 94612					
	CROSS STREET 17th Street					
IMPLEMENTING AGENCIES	LOCAL AGENCY Alameda County Health Care		CONTACT PERSON Tom Pencock		PHONE (510) 271-4530	
	REGIONAL BOARD RW&CB - S.F. Bay Area		CONTACT PERSON Rich Hiett		PHONE ()	
SUBSTANCES INVOLVED	(1) NAME: Gasoline QUANTITY LOST (GALLONS): <input checked="" type="checkbox"/> UNKNOWN					
	(2) QUANTITY LOST (GALLONS): <input type="checkbox"/> UNKNOWN					
DISCOVERY/ABATEMENT	DATE DISCOVERED 01/07/93		HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> TANK TEST <input type="checkbox"/> TANK REMOVAL <input checked="" type="checkbox"/> OTHER Letter from the Agency			
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	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE 01/03/92					
SOURCE/ CAUSE	SOURCE OF DISCHARGE <input type="checkbox"/> TANK LEAK <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER		CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL <input type="checkbox"/> CORROSION <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER			
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COMMENTS	(Empty space for additional notes)					

INSTRUCTIONS

EMERGENCY

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LOCAL AGENCY ONLY

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REPORTED BY

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RESPONSIBLE PARTY

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SITE LOCATION

Enter information regarding the tank facility. At a minimum, you must provide the facility name and full address.

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DISCOVERY/ABATEMENT

Provide information regarding the discovery and abatement of the leak.

SOURCE/CAUSE

Indicate source(s) of leak. Check box(es) indicating cause of leak.

CASE TYPE

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Excavate and Dispose - remove contaminated soil and dispose in approved site.
Excavate and Treat - remove contaminated soil and treat (includes spreading or land farming).
Remove Free Product - remove floating product from water table.
Pump and Treat Groundwater - generally employed to remove dissolved contaminants.
Enhanced Biodegradation - use of any available technology to promote bacterial decomposition of contaminants.
Replace Supply - provide alternative water supply to affected parties.
Treatment at Hookup - install water treatment devices at each dwelling or other place of use.
Vacuum Extract - use pumps or blowers to draw air through soil.
Vent Soil - bore holes in soil to allow volatilization of contaminants.
No Action Required - incident is minor, requiring no remedial action.

COMMENTS - Use this space to elaborate on any aspects of the incident.

SIGNATURE - Sign the form in the space provided.

DISTRIBUTION

If the form is completed by the tank owner or his agent, retain the last copy and forward the remaining copies intact to your local tank permitting agency for distribution.

1. Original - Local Tank Permitting Agency
2. State Water Resources Control Board, Division of Clean Water Programs, Underground Storage Tank Program, P.O. Box 944212, Sacramento, CA 94244-2120
3. Regional Water Quality Control Board
4. Local Health Officer and County Board of Supervisors or their designee to receive Proposition 65 notifications.
5. Owner/responsible party.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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 17, 1993
STID 4070

Douglas Motor Service
ATTN: Leland Douglas
1721 Webster St.
Oakland, CA 94612

Re: 1721 Webster St., Oakland, CA 94612

Dear Leland Douglas:

Second Notice

This office has reviewed the report of the underground storage tank removals performed at the above referenced site on August 3, 1992 and subsequent soil analysis. You were first told of these issues in a letter from this office dated February 22, 1993. To date there has been no response on your part. The following comments are to be considered:

1. The Underground Tank Leak Report you filed was written on a fax copy, which does not allow for distribution. This is being returned. Please submit it completed to this office on the enclosed form as soon as possible.
2. It is clear that the elevated volatile hydrocarbon concentrations (as high as 1,500 ppm TPHg) in soil at the above site requires a soil and groundwater investigation. While we can be sympathetic to your financial condition, the law does not allow us to ignore your site in preference to bigger companies. You are required to begin an investigation, as follows:

I have enclosed the document, Appendix A, Workplan for Initial Subsurface Investigation, a guidance document published by the Regional Water Quality Control Board (RWQCB).

Appendix A is to be used in conjunction with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, the State Water Resources Control Board Leaking Underground Fuel Tank (LUFT) Field Manual, and Article II of Title 23, Calif. Code of Regulations when developing the scope of the Preliminary Site Assessment (PSA) work plan.

Please be advised this office is working in conjunction with the RWQCB to oversee the remediation of hydrocarbon contaminated

1721 Webster St., Oakland, CA 94612
STID 4070
August 17, 1993
Page 2 of 2

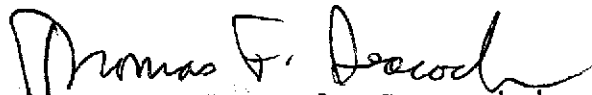
sites such as these. the RWQCB is the agency entrusted to protect the waters of the state.

Please submit a workplan as described in the above documents to this office within sixty (60) days of this letter.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Be aware that failure to submit the requested documents may subject you to civil liabilities.

If you have any questions please call this office at (510) 271-4530.

Sincerely,



Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: Gil Jensen, Alameda County District Attorney's Office
Edgar B. Howell, Chief - ~~Files~~
enclosures

CROSBY, HEAFEY, ROACH & MAY

PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

1999 HARRISON STREET

OAKLAND, CALIFORNIA 94612-3573

(510) 763-2000

(415) 986-3400

FAX (510) 273-8832

700 SOUTH FLOWER STREET, SUITE 2200
LOS ANGELES, CALIFORNIA 90017
(213) 896-8000
FAX (213) 896-8080

333 BUSH STREET, SUITE 2580
SAN FRANCISCO, CALIFORNIA 94104-2899
(415) 543-8700
FAX (415) 391-8289

CF
1-RCH
2-512

June 9, 1993

CALIFORNIA REGIONAL WATER

JUN 10 1993

SFF

QUALITY CONTROL BOARD

VIA FACSIMILE AND U.S. MAIL

Theodore A. Cobb
Senior Staff Counsel
State Water Resources Control Board
Paul R. Bonderson Building
901 P Street
P. O. Box 100
Sacramento, CA 95812-0100

RB# 01-0151

Re: Petition of Douglas Motor Service/File No A-843
Petition of Alvin A. Bacharach/File No A-843(a)

Dear Mr. Cobb:

This will confirm that I have spoken to counsel for Douglas Motor Service regarding the above-captioned Petitions, and we have mutually agreed to extend the deadline for the filing of our Responses to same to July 12, 1993 in order to allow further negotiations at the County level. Per my telephone conversation with you on June 7, 1993, this will also confirm that you have agreed to the requested extensions.

Thank you for your cooperation.

Very truly yours,



Janet C. Absher

JCA/tss

cc: Interested Persons Mailing List
Via Regular Mail

CROSBY, HEAFEY, ROACH & MAY
PROFESSIONAL CORPORATION

Theodore A. Cobb
June 9, 1993
Page 2

Bernard F. Rose
RANDICK & O'DEA
1800 Harrison St., Suite 1771
Oakland, CA 94612

Mr. Paul M. Smith
Dept. of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

Mr. Thomas Peacock
Dept. of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

✓ Steven Ritchie, Executive Officer
California Regional Water Quality
Control Board, San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, CA 94612

Gilbert A. Jensen, Esq.
Sr. Deputy District Attorney
Consumer and Environmental
Protection Division
7677 Oakport Street
Suite 400
Oakland, CA 94621

Alameda County Department of Environment & Health
Hazardous Materials Division

80 Swan Way, Rm. 200, Oakland, CA 94621
Ph: 510-271-4320

BILLING FOR SERVICES

SHD# 4070

A. Site Name 1721 Webster St Phone _____

Site Address (If no address, description of area) oakland, CA 94612
Number Street City Zip

Prior Business Name _____ Prior Owner's Name _____

B. Service Requestor MARK BORSEK Phone _____
Contact Person Company Name

Billing Address 1626 VALETO ST SAN FRANCISCO, CA 94123
Number Street City Zip

Category of Service	
<input checked="" type="checkbox"/> Site Search	#Hours <u>1</u> x \$ <u>75</u> /Hr \$ <u>75</u> (Whole Hours Only)
<input type="checkbox"/> File Search	#Copies _____ x \$ _____/Copy \$ _____
<input type="checkbox"/> Other _____	_____ x \$ _____ \$ _____ Other
TOTAL CHARGE: \$ <u>75.00</u>	

REMARKS: _____

You will receive an invoice in accordance with Article 11 of Chapter 6, Title 3 of the Ordinance Code of Alameda County

Service Requestor Mark Borsuk Med. Bred Date 6/2/93
printed name signature
HazMat Specialist T.S. for Tom Prescott Date 6/2/93
printed name signature

STATE WATER RESOURCES CONTROL BOARD

PAUL R. BONDERSON BUILDING
901 P STREET
P. O. BOX 100
SACRAMENTO, CALIFORNIA 95812-0100



(916) 657-0406

FAX: (916) 653-0428

01-0151

APR 26 1993

APR 22 1993

William J. Trinkle, Esq.
Randick & O'Dea
1800 Harrison, Suite 2350
Oakland, CA 94612

Randall D. Morrison, Esq.
Crosby, Heafey, Roach & May
1999 Harrison Street
Oakland, CA 94612-3573

Dear Messrs. Trinkle and Morrison:

IN THE MATTER OF THE PETITIONS OF DOUGLAS MOTOR SERVICE, ALVIN BACHARACH AND JEAN BORSUK, FOR REVIEW OF CORRECTIVE ACTION ORDER ISSUED ON FEBRUARY 5, 1993 BY ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH. OUR FILE NOS. A-843 AND A-843(a).

The petitions you have filed on behalf of Douglas Motor Service and Alvin Bacharach and Jean Borsuk are complete. The State Water Resources Control Board will now begin review of the petitions and the issues they raise.

All interested parties are hereby notified that they have 20 days from the date of this letter within which to file with the State Water Board any comments or responses to these petitions. Copies of the petitions should be obtained from the petitioners listed above. Alameda County shall file with the State Water Board, within 20 days of this letter, the administrative record pertaining to these petitions.

If any interested person has questions about this process, please call me at the number listed above.

Sincerely,

A handwritten signature in cursive script, appearing to read "A Cobb".

Theodore A. Cobb
Senior Staff Counsel

cc: See Enclosed Interested Persons
Mailing List

INTERESTED PERSONS MAILING LIST

PETITIONS OF DOUGLAS MOTOR SERVICE AND
ALVIN BACHARACH AND JEAN BORSUK
CORRECTIVE ACTION ORDER BY THE ALAMEDA COUNTY
DEPARTMENT OF ENVIRONMENTAL HEALTH
OUR FILE NOS. A-843 AND A-843(a)

William J. Trinkle, Esq.
Randick & O'Dea
Suite 2350
1800 Harrison Street
Oakland, CA 94612

Randall D. Morrison, Esq.
Crosby, Heafey, Roach & May
1999 Harrison Street
Oakland, CA 94612-3573

Paul Smith, Sr. Hazardous Material Specialist
Hazardous Materials Division
Alameda County Department of Environmental Health
80 Swan Hay, Room 200
Oakland, CA 94621

Steven Ritchie, Executive Officer
California Regional Water Quality
Control Board, San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, CA 94612

Gilbert A. Jensen, Esq.
Senior Deputy District Attorney
Consumer and Environmental Protection Division
7677 Oakport Street, Suite 400
Oakland, CA 94621

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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

February 22, 1993
STID 4070

Douglas Motor Service
ATTN: Leland Douglas
1721 Webster St.
Oakland, CA 94612

Re: 1721 Webster St., Oakland, CA 94612

Dear Leland Douglas:

This office has reviewed the report of the underground storage tank removals performed at the above referenced site on August 3, 1992 and subsequent soil analysis. The following comments are to be considered:

1. The Underground Tank Leak Report you filed was written on a fax copy, which does not allow for distribution. This is being returned. Please submit it completed to this office on the enclosed form as soon as possible.
2. It is clear that the elevated volatile hydrocarbon concentrations (as high as 1,500 ppm TPHg) in soil at the above site requires a soil and groundwater investigation. While we can be sympathetic to your financial condition, the law does not allow us to ignore your site in preference to bigger companies. You are required to begin an investigation, as follows:

I have enclosed the document, Appendix A, Workplan for Initial Subsurface Investigation, a guidance document published by the Regional Water Quality Control Board (RWQCB).

Appendix A is to be used in conjunction with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, the State Water Resources Control Board Leaking Underground Fuel Tank (LUFT) Field Manual, and Article II of Title 23, Calif. Code of Regulations when developing the scope of the Preliminary Site Assessment (PSA) work plan.

Please be advised this office is working in conjunction with the RWQCB to oversee the remediation of hydrocarbon contaminated sites such as these. The RWQCB is the agency entrusted to protect the waters of the state.

1721 Webster St., Oakland, CA 94612
STID 4070
February 22, 1993
Page 2 of 2

Please submit a workplan as described in the above documents to this office within sixty (60) days of this letter.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). All workplans, analytical results or reports should be sent to our office and to that of the RWQCB to the attention of Mr. Rich Hiett. Their address is 2101 Webster St., Fourth Floor, Oakland CA 94612. Be aware that failure to submit the requested documents may subject you to civil liabilities.

If you have any questions please call this office at (510) 271-4530.

Sincerely,



Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: R. Hiett, RWQCB
~~Edgar B. Howell~~, Chief - Files *EPH*
enclosures

Site Summary STID 4070
Douglas Parking
1721 Webster St.
Oakland 94612

- 7/27/92 Tank Closure Plan approved by AlCo (Larry Seto)
- 4/16/92 letter from AlCo to RP, requesting tank removal or permitting
- 8/3/92 note to file from L. Seto: Ernie Bernabe said Jamie Ramey of city of Oakland Construction Inspector, Office of Public Works, was at the site on 8/2/92, and told them to backfill the pit w/a 2 bag sand slurry since the walls around the tank are caving in. They did not want to do shoring bec of the cost.
- Note to file from L. Seto: One of the scheduled 3 USTs were removed. Sewer line was broken. 2 soil samples taken under both ends of UST after removal. Overex was done. **Strong odor of gas and FP in pit. Contractor forgot to get confirmatory sidewalls and water sample after the overex.**
- 8/4/92 note to file from L. Seto: One UGT has been removed. Two others will be removed at a later date.
- 8/6/92 note to file from L. Seto: The two 500-gal UST on the W side of sidewalk were removed. 3 soil samples were taken below the USTs. **The pit had a strong gas odor.** The pit was overexed, and 2 conf samples taken from floor, and a sample fm each wall.
- 8/12/92 Letter from Parker Env. To Bernabe and Brinker. **RE UST Removal Report. Up to 1,500 ppm TPHg and up to 12 ppm benzene.**
- 11/20/92 NOR sent to Leland Douglas
- 12/4/92 Mark Borsuk did file search
- 1/7/93 Letter from AlCo to RP (Tom Peacock). Requests ULR, tank manifests, and workplan for initial subsurface invest. Within 60 days (by 3/7/93)
- 1/29/93 Letter from RP to AlCo. Attached are manifests for the USTs. **Says they cannot afford to do workplan and invest., and wonders if it is really necessary. Letter also says a ULR is attached, but I could not locate it (JE 6/6/95).**



FOUNDED 1930

DOUGLAS PARKING COMPANY

PARKING CONSULTANTS, MANAGEMENT & LEASING

1721 WEBSTER STREET
OAKLAND, CALIFORNIA 94612

TELEPHONE (510) 444-7412, 444-7352; FAX (510) 452-3654

STID 4070

January 29, 1993

Thomas Peacock
Supervising HMS
Alameda County Health Care Services Agency
80 Swan Way, Room 200
Oakland, CA 94621

Ref: **STID 4070**
1721 Webster Street, Oakland

Dear Mr. Peacock:

With reference to your letter of January 7, 1992 (actually 1993), enclosed please find the items you required:

1. Underground Tank Leak Report - *not here*
2. Uniform Hazardous Waste Manifest for three tanks.

Regarding the requirement for further investigation, please take note that thus far we have complied willingly and thoroughly with all regulations, but at great cost to us. In the past, when we sold gas, we sold less than 1,000 gallons per month. From this, we made a meager profit of perhaps \$1000 for the entire year (our main business was not selling gas). Last year we removed the gas tanks at a cost of \$30,712.10.

Now, to our dismay, we discover that we are required to do still more work. We have received one estimate to do this additional investigation. That estimate is for a minimum of \$17,194.

Mr. Peacock, we are a small business, trying desperately to survive in Oakland. These costs are a tremendous hardship for us. We are a third generation business, now that my son has joined me. With costs such as these, our future looks uncertain. We **simply cannot afford these additional costs.**

In our situation, is further investigation necessary? According to the report, we had only three "hot spots" exceeding 1000 ppm (and they exceeded this amount by a maximum of 500 ppm). The composite contamination was only 560 ppm. From what we understand, you are asking us to do nearly the same investigation as that at at least

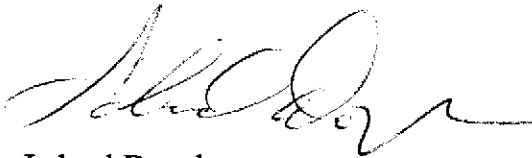
three other sites in Oakland with extraordinarily higher levels of contamination. All three of these sites (there might be more of which we are not aware) are owned by large oil companies such as Chevron and Exxon (14th and Harrison, 1633 Harrison, and 8th and Alice). Does our company, which pumped a mere 1000 gallons of gasoline maximum per month fall into the same category as these behemoth oil companies that pumped as much in an hour as we did in a month?

Please note also that there were no holes in any of the gas tanks (see Parker Environmental Services report enclosed). What little contamination there was must have come from spillage while filling the tanks or from some other source upgradient. Must we bear the costs of someone else's possible infractions?

In light of all the above facts, is it necessary for us to do further investigation? In our situation, we think this is overkill. We have already paid severely for the work that has been done. We simply cannot stay economically viable and incur these costs. We are aware of a fund to minimize this great expense, but we've been informed that the chances of this fund benefitting us is extremely remote.

Please let me know if this additional investigation is necessary in our situation. I appreciate and thank you in advance for your assistance in this matter which is of grave importance to us.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Leland Douglas", written in a cursive style.

Leland Douglas
Douglas Parking Company

LMD/ra
encls.

Please print or type. Form designed for use on elite (12-pitch typewriter).

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. **C A D 0 0 4 7 7 1 1 6 8** Manifest Document No. **0 0 0 0 0 1 2** 2. Page 1 of 1 Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
MR. LELAND TROTT
1721 Webster Street, Oakland, CA. 94612
4. Generator's Phone **(510) 444-7342**

A. State Manifest Document Number **91510285**

5. Transporter 1 Company Name
H & H Ship Service Company

B. State Generator's ID

6. US EPA ID Number
C A D 0 0 4 7 7 1 1 6 8

C. State Transporter's ID

7. Transporter 2 Company Name

D. Transporter's Phone **(415) 543-4835**

8. US EPA ID Number

E. State Transporter's ID

9. Designated Facility Name and Site Address
H & H Ship Service Company
220 China Basin Street
San Francisco, CA 94107

F. Transporter's Phone

10. US EPA ID Number
C A D 0 0 4 7 7 1 1 6 8

G. State Facility's ID

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

H. Facility's Phone **(415) 543-4835**

a. **RESIDUE UNLEADED GASOLINE TANK**
NON-RCRA HAZARDOUS WASTE SOLID

I. Waste Number
State **512**
EPA/Other

b. **RESIDUE REGULAR GASOLINE TANK**
NON-RCRA HAZARDOUS WASTE SOLID

12. Containers
No. Type Quantity

c.

13. Total Quantity

d.

14. Unit
Wt/Vol

15. Special Handling Instructions and Additional Information
JOB #11114
24 Hr. Emergency Contact: H & H # (415) 543-4835
APPROPRIATE PROTECTIVE CLOTHING AND RESPIRATOR

15. Total Quantity

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

K. Handling Codes for Wastes Listed Above
a. **01** b. **01**
c. d.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name
[Signature]
Signature
Month Day Year
0 8 0 6 9 2

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name
JAMES R. MORGAN
Signature
Month Day Year
0 8 0 6 9 2

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name
Signature
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name
Signature
Month Day Year

Printed/Typed Name
Signature
Month Day Year

Printed/Typed Name
Signature
Month Day Year

DO NOT WRITE BELOW THIS LINE.

91510285

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

GENERATOR

Please print or type. Form designed for use on effie (12-pitch typewriter).

91510246

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

GENERATOR

TRANSPORTER

FACILITY

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. CA12101010181615101116		Manifest Document No. 01010101		2. Page 1 of		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address MR. LELAND DOUGLAS 1721 Webster Street, Oakland, CA. 94612						A. State Manifest Document Number 91510246							
4. Generator's Phone (510) 444-7342						B. State Generator's ID							
5. Transporter 1 Company Name H & H Ship Service Company			6. US EPA ID Number CA1210101014171711111610			C. State Transporter's ID 100924		D. Transporter's Phone (415) 543-4835					
7. Transporter 2 Company Name			8. US EPA ID Number			E. State Transporter's ID		F. Transporter's Phone					
9. Designated Facility Name and Site Address H & H Ship Service Company 220 China Basin Street San Francisco, CA 94107						G. State Facility's ID CA1210101014171711111610							
10. US EPA ID Number CA1210101014171711111610						H. Facility's Phone (415) 543-4835							
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste Number	
a. RESIDUE SUPER UNLEADED GASOLINE TANK NON-RARA HAZARDOUS WASTE SOLID						0101		TIP 0110000		P		State EPA/Other	
b. RESIDUE UNLEADED GASOLINE TANKS NON-RARA HAZARDOUS WASTE SOLID						0102		TIP 01015000		P		State EPA/Other	
c.												State EPA/Other	
d.												State EPA/Other	
J. Additional Descriptions for Materials Listed Above EMPTY 1,000 and 500 gallon tanks last containing super unleaded and unleaded gasoline. Tanks loaded with dry ice for transport.						K. Handling Codes for Wastes Listed Above							
						a. 01		b. 01		c.		d.	
15. Special Handling Instructions and Additional Information JOB #11088 24 Hr. Emergency Contact: H & H # (415) 543-4835 APPROPRIATE PROTECTIVE CLOTHING AND RESPIRATOR JOB SITE: DOUGLAS PARKING 1721 Webster Street Oakland, California													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name LELAND DOUGLAS				Signature <i>[Signature]</i>				Month Day Year 018 10 13 19 11					
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name ESTEBAN M. PENALVER				Signature <i>[Signature]</i>				Month Day Year 018 10 11 19 12					
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature				Month Day Year					
19. Discrepancy Indication Space													
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name													
Signature				Month Day Year									

DO NOT WRITE BELOW THIS LINE.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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

January 7, 1993
STID 4070

CALIFORNIA REGIONAL WATER

JAN 12 1993

QUALITY CONTROL BOARD

Douglas Motor Service
ATTN: Leland Douglas
1721 Webster St.
Oakland, CA 94612

Re: 1721 Webster St., Oakland, CA 94612

Dear Leland Douglas:

This office has reviewed reports of the underground storage tank removals performed at the above referenced site on August 3, 1992 and subsequent soil analysis. The following comments are to be considered:

1. You have not submitted an Underground Tank Leak Report, as required. Please submit it completed to this office on the enclosed form as soon as possible.
2. The report by Parker did not contain any manifests for disposal of the underground tanks. Please submit these documents as soon as possible.
3. It is clear that the elevated volatile hydrocarbon concentrations (as high as 1,500 ppm TPHg) in soil at the above site requires a soil and groundwater investigation.

I have enclosed the document, Appendix A, Workplan for Initial Subsurface Investigation, a guidance document published by the Regional Water Quality Control Board (RWQCB).

Appendix A is to be used in conjunction with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, the State Water Resources Control Board Leaking Underground Fuel Tank (LUFT) Field Manual, and Article II of Title 23, Calif. Code of Regulations when developing the scope of the Preliminary Site Assessment (PSA) work plan.

Please be advised this office is working in conjunction with the RWQCB to oversee the remediation of hydrocarbon contaminated sites such as these. The RWQCB is the agency entrusted to protect the waters of the state.

Please submit a workplan as described in the above documents to this office within sixty (60) days of this letter.

Handwritten signature/initials in a circle.

Handwritten initials "RA" with a checkmark.

Handwritten number "01-0151" with a horizontal line below it.

1721 Webster St., Oakland, CA 94612
STID 4070
January 7, 1992
Page 2 of 2

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). All workplans, analytical results or reports should be sent to our office and to that of the RWQCB to the attention of Mr. Rich Hiatt. Their address is 2101 Webster St., Fourth Floor, Oakland CA 94612. Be aware that failure to submit the requested documents may subject you to civil liabilities.

If you have any questions please call this office at (510) 271-4530.

Sincerely,



Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: R. Hiatt, RWQCB
Edgar B. Howell, Chief - Files
enclosures

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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

January 7, 1992
STID 4070

Douglas Motor Service
ATTN: Leland Douglas
1721 Webster St.
Oakland, CA 94612

Re: 1721 Webster St., Oakland, CA 94612

Dear Leland Douglas:

This office has reviewed reports of the underground storage tank removals performed at the above referenced site on August 3, 1992 and subsequent soil analysis. The following comments are to be considered:

1. You have not submitted an Underground Tank Leak Report, as required. Please submit it completed to this office on the enclosed form as soon as possible.
2. The report by Parker did not contain any manifests for disposal of the underground tanks. Please submit these documents as soon as possible.
3. It is clear that the elevated volatile hydrocarbon concentrations (as high as 1,500 ppm TPHg) in soil at the above site requires a soil and groundwater investigation.

I have enclosed the document, Appendix A, Workplan for Initial Subsurface Investigation, a guidance document published by the Regional Water Quality Control Board (RWQCB).

Appendix A is to be used in conjunction with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, the State Water Resources Control Board Leaking Underground Fuel Tank (LUFT) Field Manual, and Article II of Title 23, Calif. Code of Regulations when developing the scope of the Preliminary Site Assessment (PSA) work plan.

Please be advised this office is working in conjunction with the RWQCB to oversee the remediation of hydrocarbon contaminated sites such as these. The RWQCB is the agency entrusted to protect the waters of the state.

Please submit a workplan as described in the above documents to this office within sixty (60) days of this letter.

1721 Webster St., Oakland, CA 94612

STID 4070

January 7, 1992

Page 2 of 2

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). All workplans, analytical results or reports should be sent to our office and to that of the RWQCB to the attention of Mr. Rich Hiatt. Their address is 2101 Webster St., Fourth Floor, Oakland CA 94612. Be aware that failure to submit the requested documents may subject you to civil liabilities.

If you have any questions please call this office at (510) 271-4530.

Sincerely,



Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: R. Hiatt, RWQCB
Edgar B. Howell, Chief - Files *EBH*
enclosures

MARK BORSUK
ATTORNEY AT LAW

1626 VALLEJO STREET
SAN FRANCISCO, CA 94123-5116

FAX 922-1485
(415) 922-4740

12-1-92
apt was cancelled.

November 25, 1992

Mr. Larry Seto
Division of Hazardous Materials
Department of Environmental Health
Alameda County Health Care Services
Room 200
80 Swan Way
Oakland, CA 94621
(510) 271-4320
FAX 569-4757

SUBJECT: FILE REVIEW

Dear Larry:

This will confirm our meeting on **Friday, December 4 at 11:00 a.m.** to review the file for **1721 Webster Street, Oakland, CA 94612.**

Sincerely yours,



Mark Borsuk

DATE: 11-13-92
TO : Local Oversight Program
FROM: Carry Seto
SUBJ: Transfer of Eligible Oversight Case

Site name: Douglas Parking Co.
Address: 1721 Webster St., city Oakland zip 94612
Closure plan attached? Y N DepRef remaining \$ 231.96
DepRef Project # 1913 A STID #(if any) 4070
Number of Tanks: 3 removed? Y N Date of removal 8-3 and 8-6-92
Leak Report filed? Y N Date of Discovery 8-3-92
Samples received? Y N Contamination: Gas, Diesel
Petroleum Y N Types: Avgas Jet leaded unleaded Diesel
fuel oil waste oil kerosene solvents
Monitoring wells on site 0 Monitoring schedule? Y N
LUFT category 1 2 3 * H S C A R W G O
Briefly describe the following:
Preliminary Assessment Soil samples taken during U.G.T. removal
Remedial Action None
Post Remedial Action Monitoring None
Enforcement Action None

**ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
80 SWAN WAY, ROOM 200
OAKLAND, CA 94621
PHONE NO. 510/271-4320**

LAWRENCE SETO C.S.

7-27-92 Please note substitution
requirements for #157 #16.
ACCEPTED [Signature]

DEPARTMENT OF ENVIRONMENTAL HEALTH
470 - 27th Street, Third Floor
Oakland, CA 94612
Telephone: (415) 874-7237

These plans have been reviewed and found to be acceptable and essentially meet the requirements of State and local health laws. Changes to your plans indicated by the Department are to ensure compliance with State and local laws. The project proposed herein is now released for issuance of any required building permits for construction.

One copy of these accepted plans must be on the job and available to all contractors and craftsmen involved with the removal.

Any change or alterations of these plans and specifications must be submitted to the Department and to the Fire and Building Law Enforcement Department by date of such changes meet the requirements of State and local laws. Notify this Department at least 48 hours prior to the following required inspections:

- _____ Removal of Tank and Piping
- _____ Sampling
- _____ Final Inspection

Balance of a permit is dependent on compliance with accepted plans and all applicable laws and regulations.

THIS IS A PRELIMINARY PERMIT FOR NOT
REMOVING THESE TANKS.

UNDERGROUND TANK CLOSURE PLAN

* * * Complete according to attached instructions * * *

1. Business Name Douglas Parking
Business Owner Leland Douglas
 2. Site Address 1721 Webster
City Oakland Zip 94612 Phone 510-444-7352
 3. Mailing Address 1721 Webster
City Oakland Zip 94612 Phone 510-444-7342
 4. Land Owner Leland Douglas
Address 1721 Webster City, State Oakland, CA Zip 94612
 5. Generator name under which tank will be manifested Douglas Parking Co.
- EPA I.D. No. under which tank will be manifested CAC000865016

6. Contractor Bernabe and Brinker Inc.

Address 1281-30th Street

City Oakland, CA. 94608

Phone 510-451-3482

License Type* A-Haz

ID# 610617

*Effective January 1, 1992, Business and Professional Code Section 7058.7 requires prime contractors to also hold Hazardous Waste Certification issued by the State Contractors License Board. Indicate that the certificate has been received, in addition, to holding the appropriate contractors license type.

7. Consultant Bernabe and Brinker Inc.

Address 1281-30th Street

City Oakland, CA. 94608

Phone 510-451-3482

8. Contact Person for Investigation

Name Leland Douglas

Title Partner

Phone 510-444-7352

9. Number of tanks being closed under this plan 3

Length of piping being removed under this plan 60 ft.

Total number of tanks at facility 3

10. State Registered Hazardous Waste Transporters/Facilities (see instructions).

** Underground tanks are hazardous waste and must be handled **
as hazardous waste

a) Product/Residual Sludge/Rinsate Transporter

Name H & H EPA I.D. No. CAD004771168

Hauler License No. 0334 License Exp. Date 01/31-93

Address 220 China Basin

City SF State CA Zip 94107

b) Product/Residual Sludge/Rinsate Disposal Site

Name H & H EPA I.D. No. CAD004771168

Address 220 China Basin

City SF State CA Zip 94107

c) Tank and Piping Transporter

Name H & H EPA I.D. No. CAD00477168
Hauler License No. 0334 License Exp. Date 01-31-93
Address 220 China Basin
City SF State CA Zip 94107

d) Tank and Piping Disposal Site

Name H & H EPA I.D. No. CAD00477168
Address 220 China Basin
City SF State CA Zip 94107

11. Experienced Sample Collector

Name Jim Parker
Company Parker Environmental
Address 21185 Rialto Court
City Pittsburgh State CA Zip 94565 Phone _____

12. Laboratory

Name Mc Campbell Analytical
Address 110 2nd Avenue S. #D7
City Pacheco State CA Zip 94553
State Certification No. 1644

13. Have tanks or pipes leaked in the past? Yes [] No [X]

If yes, describe. _____

14. Describe methods to be used for rendering tank inert
 15 lbs. dry ice /1000 gallon ust. LEL meter will be on site
-
-

Before tanks are pumped out and inerted, all associated piping must be flushed out into the tanks. All accessible associated piping must then be removed. Inaccessible piping must be plugged.

The Bay Area Air Quality Management District (771-6000), along with local Fire and Building Departments, must also be contacted for tank removal permits. Fire departments typically require the use of explosion proof combustible gas meters to verify tank inertness. It is the contractor's responsibility to bring a working combustible gas meter on site to verify tank inertness.

15. Tank History and Sampling Information

Tank		Material to be sampled (tank contents, soil, ground-water, etc.)	Location and Depth of Samples
Capacity	Use History (see instructions)		
1,000	super unleaded	soil and ground water if present	both ends of tank 2FT below the tank native soil
500	unleaded	soil and ground water if present	fill end of the tank 2ft below the tank native soil
500	unleaded	soil and ground water if present	fill end of the tank 2 ft below the tank native soil

One soil sample must be collected for every 20 feet of piping that is removed. A ground water sample must be collected should any ground water be present in the excavation.

Excavated/Stockpiled Soil	
Stockpiled Soil Volume (Estimated) 20 cubic yards	Sampling Plan <i>Four samples to be composited into one.</i> tphg/btxe

Stockpiled soil must be placed on bermed plastic and must be completely covered by plastic sheeting.

16. Chemical methods and associated detection limits to be used for analyzing samples

The Tri-Regional Board recommended minimum verification analyses and practical quantitation reporting limits should be followed. See attached Table 2.

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit
Unleaded gas UST YPH-G/BTXE	5030	GCFID 8020 or 8240	
Unknown UST TPH-G/BTXE TPH-D	5030	GCFID 8020 or 8240	
Oil & Grease	3550	GCFID 5520 8010 or 8240	
Chlorinated MC'S		ICAP or AA	
Semivolatiles HC'S <i>Organic leach</i>		8270	

17. Submit Site Health and Safety Plan (See Instructions)

18. Submit Worker's Compensation Certificate copy

Name of Insurer State Workmens Comp

19. Submit Plot Plan (See Instructions)

20. Enclose Deposit (See Instructions)

21. Report any leaks or contamination to this office within 5 days of discovery. The report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report form. (see Instructions)

22. Submit a closure report to this office within 60 days of the tank removal. This report must contain all the information listed in item 22 of the instructions.

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true.

I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

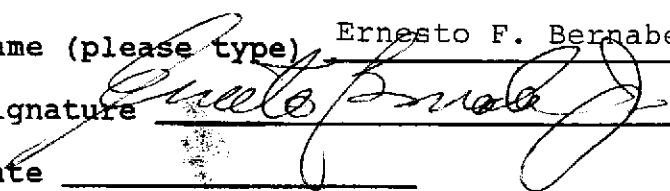
I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel health and safety. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

Once I have received my stamped, accepted closure plan, I will contact the project Hazardous Materials Specialist at least three working days in advance of site work to schedule the required inspections.

Signature of Contractor

Name (please type) Ernesto F. Bernabe Jr.

Signature 

Date _____

Signature of Site Owner or Operator

Name (please type) Leland Douglas

Signature 

Date 7/27/92

INSTRUCTIONS

General Instructions

- * Three (3) copies of this plan plus attachments and deposit must be submitted to this Department.
- * Any cutting into tanks requires local fire department approval.
- * One complete copy of your approved plan must be at the construction site at all times; a copy of your approved plan must also be sent to the landowner.
- * State of California Permit Application Forms A and B are to be submitted to this office. One Form A per site, one Form B for each removed tank.

Item Specific Instructions

2. SITE ADDRESS
Address at which closure is taking place.
5. EPA I.D. NO. under which the tanks will be manifested
EPA I.D. numbers may be obtained from the State Department of Health Services, 916/324-1781.
6. CONTRACTOR
Prime contractor for the project.
10. STATE REGISTERED HAZARDOUS WASTE TRANSPORTERS/FACILITIES
 - a) All residual liquids and sludges are to be removed from tanks before tanks are inerted.
 - c) Tanks must be hauled as hazardous waste.
 - d) This is the place where tanks will be taken for cleaning.
15. TANK HISTORY AND SAMPLING INFORMATION
Use History - This information is essential and must be accurate. Include tank installation date, products stored in the tank, and the date when the tank was last used.

Material to be sampled - e.g. water, oil, sludge, soil, etc.

Location and depth of samples - e.g. beneath the tank a maximum of two feet below the native soil/backfill interface, side wall at the high water mark, etc.

16. CHEMICAL METHODS AND ASSOCIATED DETECTION LIMITS

See attached Table 2.

17. SITE HEALTH AND SAFETY PLAN

A site specific Health and Safety plan must be submitted. We advocate the site health and safety plan include the following items, at a minimum:

- a) The name and responsibilities of the site health and safety officer;
- b) An outline of briefings to be held before work each day to appraise employees of site health and safety hazards;
- c) Identification of health and safety hazards of each work task. Include potential fire, explosion, physical, and chemical hazards;
- d) For each hazard, identify the action levels (contaminant concentrations in air) or physical conditions which will trigger changes in work habits to ensure workers are not exposed to unsafe chemical levels or physical conditions;
- e) Description of the work habit changes triggered by the above action levels or physical conditions;
- f) Frequency and types of air and personnel monitoring - along with the environmental sampling techniques and instrumentation - to be used to detect the above action levels. Include instrumentation maintenance and calibration methods and frequencies;
- g) Confined space entry procedures (if applicable);
- h) Decontamination procedures;
- i) Measures to be taken to secure the site, excavation and stockpiled soil during and after work hours (e.g. barricades, caution tape, fencing, trench plates, plastic sheeting, security guards, etc.);
- j) Spill containment/emergency/contingency plan. Be sure to include emergency phone numbers, the location of the phone nearest the site, and directions to the hospital nearest the site;
- k) Documentation that all site workers have received the appropriate OSHA approved trainings and participate in appropriate medical surveillance per 29 CFR 1910.120; and
- l) Page for employees to sign indicating they have read and will comply with the site health and safety plan.

The safety plan must be distributed to all employees and contractors working in hazardous waste operations on site. A complete copy of the site health and safety plan along with any standard operating procedures shall be on site and accessible at all times.

NOTE: These requirements are excerpts from 29 CFR Part 1910.120(b)(4), Hazardous Waste Operations and Emergency Response; Final Rule, March 6, 1989. Safety plans of certain underground tank sites may need to meet the complete requirements of this Rule.

19. PLOT PLAN

The plan should consist of a scaled view of the facility at which the tank(s) are located and should include the following information:

- a) Scale;
- b) North Arrow;
- c) Property Lines;
- d) Location of all Structures;
- e) Location of all relevant existing equipment including tanks and piping to be removed and dispensers;
- f) Streets;
- g) Underground conduits, sewers, water lines, utilities;
- h) Existing wells (drinking, monitoring, etc.);
- i) Depth to ground water; and
- j) All existing tanks and piping in addition to the ones being pulled.

20. DEPOSIT

A deposit, payable to Alameda County for the amount indicated on the Alameda County Underground Storage Tank Fee Schedule, must accompany the plans.

21. Blank Unauthorized Leak/Contamination Site Report forms may be obtained in limited quantities from our office and from the San Francisco Bay Regional Water Quality Control Board (415/464-1255). Larger quantities may be obtained directly from the State Water Resources Control Board at (916) 739-2421.

22. TANK CLOSURE REPORT

The tank closure report should contain the following information:

- a) General description of the closure activities;
- b) Description of tank, fittings and piping conditions. Indicate tank size and former contents; note any corrosion, pitting, holes, etc.;

- c) Description of the excavation itself. Include the tank and excavation depth, a log of the stratigraphic units encountered within the excavation, a description of root holes or other potential contaminant pathways, the depth to any observed ground water, descriptions and locations of stained or odor-bearing soil, and descriptions of any observed free product or sheen;
- d) Description of sampling methods;
- e) Description of any remedial measures conducted at the time of tank removal;
- f) To-scale figures showing the excavation size and depth, nearby buildings, sample locations and depths, and tank and piping locations. Include a copy of the plot plan prepared for the Tank Closure Plan under item 19;
- g) Chain of custody records;
- h) Copies of signed laboratory reports;
- i) Copies of "TSDF to Generator" Manifests for all hazardous wastes hauled offsite (sludge, rinsate, tanks and piping, contaminated soil, etc.); and
- j) Tabulation of the volume and final destination of all non-manifested contaminated soil hauled offsite.

TABLE #2
RECOMMENDED MINIMUM VERIFICATION ANALYSES FOR
UNDERGROUND TANK LEAKS

<u>HYDROCARBON LEAK</u>	<u>SOIL ANALYSIS</u>		<u>WATER ANALYSIS</u>	
Unknown Fuel	TPH G	GCFID(5030)	TPH G	GCFID(5030)
	TPH D	GCFID(3550)	TPH D	GCFID(3510)
	BTX&E	8020 or 8240	BTX&E	602, 624 or 8260
	TPH AND BTX&E	8260		
Leaded Gas	TPH G	GCFID(5030)	TPH G	GCFID(5030)
	BTX&E	8020 OR 8240	BTX&E	602 or 624
	TPH AND BTX&E	8260	TOTAL LEAD AA	
	TOTAL LEAD AA			
	-----Optional-----			
	TEL	DHS-LUFT	TEL	DHS-LUFT
	EDB	DHS-AB1803	EDB	DHS-AB1803
Unleaded Gas	TPH G	GCFID(5030)	TPH G	GCFID(5030)
	BTX&E	8020 or 8240	BTX&E	602, 624 or 8260
	TPH AND BTX&E	8260		
Diesel, Jet Fuel and Kerosene	TPH D	GCFID(3550)	TPH D	GCFID(3510)
	BTX&E	8020 or 8240	BTX&E	602, 624 or 8260
	TPH AND BTX&E	8260		
Fuel/Heating Oil	TPH D	GCFID(3550)	TPH D	GCFID(3510)
	BTX&E	8020 or 8240	BTX&E	602, 624 or 8260
	TPH AND BTX&E	8260		
Chlorinated Solvents	CL HC	8010 or 8240	CL HC	601 or 624
	BTX&E	8020 or 8240	BTX&E	602 or 624
	CL HC AND BTX&E	8260	CL HC AND BTX&E	8260
Non-chlorinated Solvents	TPH D	GCFID(3550)	TPH D	GCFID(3510)
	BTX&E	8020 or 8240	BTX&E	602 or 624
	TPH AND BTX&E	8260	TPH and BTX&E	8260
Waste and Used Oil or Unknown (All analyses must be completed and submitted)	TPH G	GCFID(5030)	TPH G	GCFID(5030)
	TPH D	GCFID(3550)	TPH D	GCFID(3510)
	TPH AND BTX&E	8260		
	O & G	5520 D & F	O & G	5520 C & F
	BTX&E	8020 or 8240	BTX&E	602, 624 or 8260
	CL HC	8010 or 8240	CL HC	601 or 624
	ICAP or AA TO DETECT METALS: Cd, Cr, Pb, Zn, Ni			
	METHOD 8270 FOR SOIL OR WATER TO DETECT:			
	PCB*		PCB	
	PCP*		PCP	
	PNA		PNA	
	CREOSOTE		CREOSOTE	

* If found, analyze for dibenzofurans (PCBs) or dioxins (PCP)

Reference: Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, 10 August 1990

EXPLANATION FOR TABLE #2: MINIMUM VERIFICATION ANALYSIS

1. OTHER METHODOLOGIES are continually being developed and as methods are accepted by EPA or DHS, they also can be used.
2. For DRINKING WATER SOURCES, EPA recommends that the 500 series for volatile organics be used in preference to the 600 series because the detection limits are lower and the QA/QC is better.
3. APPROPRIATE STANDARDS for the materials stored in the tank are to be used for all analyses on Table #2. For instance, seasonally, there may be five different jet fuel mixtures to be considered.
4. To AVOID FALSE POSITIVE detection of benzene, benzene-free solvents are to be used.
5. TOTAL PETROLEUM HYDROCARBONS (TPH) as gasoline (G) and diesel (D) ranges (volatile and extractable, respectively) are to be analyzed and characterized by GCFID with a fused capillary column and prepared by EPA method 5030 (purge and trap) for volatile hydrocarbons, or extracted by sonication using 3550 methodology for extractable hydrocarbons. Fused capillary columns are preferred to packed columns; a packed column may be used as a "first cut" with "dirty" samples or once the hydrocarbons have been characterized and proper QA/QC is followed.
6. TETRAETHYL LEAD (TEL) analysis may be required if total lead is detected unless the determination is made that the total lead concentration is geogenic (naturally occurring).
7. CHLORINATED HYDROCARBONS (CL HC) AND BENZENE, TOLUENE, XYLENE AND ETHYLBENZENE (BTX&E) are analyzed in soil by EPA methods 8010 and 8020 respectively, (or 8240) and in water, 601 and 602, respectively (or 624).
8. OIL AND GREASE (O & G) may be used when heavy, straight chain hydrocarbons may be present. Infrared analysis by method 418.1 may also be acceptable for O & G if proper standards are used. **Standard Methods** 17th Edition, 1989, has changed the 503 series to 5520.
9. PRACTICAL QUANTITATION REPORTING LIMITS are influenced by matrix problems and laboratory QA/QC procedures. Following are the Practical Quantitation Reporting Limits:

	<u>SOIL PPM</u>	<u>WATER PPB</u>
TPH G	1.0	50.0
TPH D	1.0	50.0
BTX&E	0.005	0.5
O & G	50.0	5,000.0

Based upon a Regional Board survey of Department of Health Services Certified Laboratories, the Practical Quantitation Reporting Limits are attainable by a majority of laboratories with the exception of diesel fuel in soils. The Diesel Practical Quantitation Reporting Limits, shown by the survey, are:

ROUTINE	MODIFIED PROTOCOL
≤ 10 ppm (42%)	≤ 10 ppm (10%)
≤ 5 ppm (19%)	≤ 5 ppm (21%)
≤ 1 ppm (35%)	≤ 1 ppm (60%)

When the Practical Quantitation Reporting Limits are not achievable, an explanation of the problem is to be submitted on the laboratory data sheets.

- LABORATORY DATA SHEETS are to be signed and submitted and include the laboratory's assessment of the condition of the samples on receipt including temperature, suitable container type, air bubbles present/absent in VOA bottles, proper preservation, etc. The sheets are to include the dates sampled, submitted, prepared for analysis, and analyzed.
- IF PEAKS ARE FOUND, when running samples, that do not conform to the standard, laboratories are to report the peaks, including any unknown complex mixtures that elute at times varying from the standards. Recognizing that these mixtures may be contrary to the standard, they may not be readily identified; however, they are to be reported. At the discretion of the LIA or Regional Board the following information is to be contained in the laboratory report:

The relative retention time for the unknown peak(s) relative to the reference peak in the standard, copies of the chromatogram(s), the type of column used, initial temperature, temperature program is C/minute, and the final temperature.

- REPORTING LIMITS FOR TPH are: gasoline standard ≤ 20 carbon atoms, diesel and jet fuel (kerosene) standard ≤ 50 carbon atoms. It is not necessary to continue the chromatography beyond the limit, standard, or EPA/DHS method protocol (whichever time is greater).

EPILOGUE

ADDITIVES: Major oil companies are being encouraged or required by the federal government to reformulate gasoline as cleaner burning fuels to reduce air emissions. MTBE (Methyl-tertiary butyl ether), ETHANOL (ethyl alcohol), and other chemicals may be added to reformulate gasolines to increase the oxygen content in the fuel and thereby decrease undesirable emissions (about four percent with MTBE). MTBE and ethanol are, for practical purposes, soluble in water. The removal from the water column will be difficult. Other compounds are being added by the oil companies for various purposes. The refinements for detection and analysis for all of these additives are still being worked out. If you have any questions about the methodology, please call your Regional Board representative.

INSTRUCTIONS

Specific Location of Project: Indicate where the tank removal or soil excavation is taking place.

Examples:

- Northwest corner of Gas Station lot
- Pit D of South Excavation area
- Fuel storage area north of Auxiliary Road

Scheduled Startup Date: Indicate a correct and accurate startup date. If this date is delayed (by no more than five working days) telephone the District at (415) 771-6000, extension 128, to report the new startup date. If the project is delayed for more than five days, submit a new form and indicate the status of your previous notification.

Tank Removal: Indicate what type method will be used to remove vapors after tank is emptied of product. (Tanks must have all liquids and sludges removed to the extent possible before decommissioning.)

Soil Excavation: Indicate whether contaminated soil stockpile will be covered. If an alternative method of aeration will be used (e.g., forced air), briefly describe.

Contractor Information: Indicate the name, address, appropriate contact person and phone number of the contractor performing and responsible for the tank removal and/or soil excavation.

Consultant Information: If applicable, indicate the name, address, appropriate contact person and phone number of any environmental consultant used.

NOTE

Notification must be postmarked at least five days prior to startup of tank removal and/or soil excavation.

Aeration of contaminated soil shall be reported to the District by telephone no less than 24 hours prior to the spreading or heating of any contaminated soil.

Return this form by FAX (415) 928-0338 or mail to:

Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109
Attn: Enforcement Division

Soil aeration operations do not require a BAAQMD permit unless:

1. The project exceeds three months time or,
2. An alternative method other than spreading the soil for evaporation will be used, or
3. Tanks are being replaced (new installation).

Use this form to meet the reporting requirements of Regulation 8, Rule 40, Section 400.

13407 Folsom Blvd., Suite B
 Folsom, California 95630
 (916) 985-3639

Network Environmental Systems, Inc.

Type	Make	Material	Size
Full Face	3M	7800	N/A
1/2 Face	3M	7300	N/A

QUALITATIVE RESPIRATOR FIT TEST

NES

Network
 Environmental
 Systems, Inc.

certifies that

ERNESTO F. BERNABE, JR.

has successfully completed

- 40-hr OSHA Emergency Response
 8-hr Supervisor Refresher

in accordance with 29 CFR 1910.120

Bruno J. Jansen
 Course Director

11/22/91
 Date

**STATE
COMPENSATION
INSURANCE
FUND**

P.O. BOX 807, SAN FRANCISCO, CA 94101-0807

CERTIFICATE OF WORKERS' COMPENSATION INSURANCE

JUNE 11, 1992

POLICY NUMBER: 1305773-92
CERTIFICATE EXPIRES: 6-1-93

COVERAGE PERIOD: 6-11-92 TO 6-1-93


COUNTY OF ALAMEDA
HEALTH DEPARTMENT
80 SWAN WAY
OAKLAND, CA. 94612

This is to certify that we have issued a valid Workers' Compensation insurance policy in a form approved by the California Insurance Commissioner to the employer named below for the policy period indicated.

This policy is not subject to cancellation by the Fund except upon ten days' advance written notice to the employer.

We will also give you TEN days' advance notice should this policy be cancelled prior to its normal expiration.

This certificate of insurance is not an insurance policy and does not amend, extend or alter the coverage afforded by the policies listed herein. Notwithstanding any requirement, term, or condition of any contract or other document with respect to which this certificate of insurance may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.


PRESIDENT

EMPLOYER

BERNABE & BRINKER INC.
1281 - 30TH ST.
OAKLAND, CA. 94608



BERNABE AND BRINKER INC.

General Engineering Contractor • Hazardous Substances Removal • License #610617

1281 - 30th Street
Oakland, California 94608

TEL: 510 • 451 • 3482
FAX: 510 • 836 • 2635

19th St.

one way ←

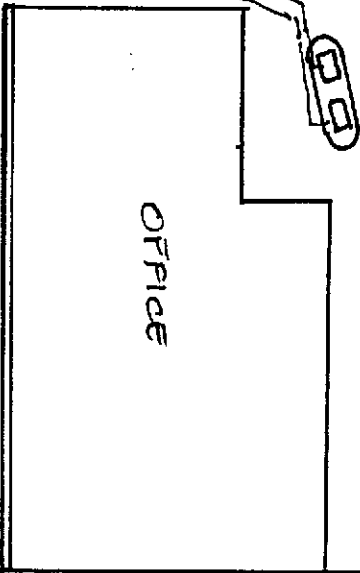
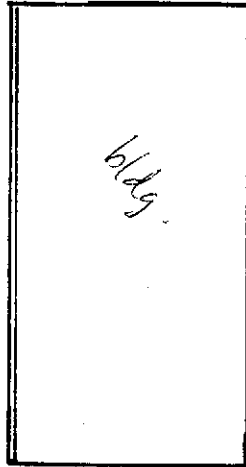


WEBSTER STREET

DOUGLAS PARKING
1721 WEBSTER
OAKLAND, 94612

See 1500

1,000



PARKING LOT

Handwritten signature or name

TO 18TH STREET →

SIDEWALK

18th St.

one way →

B&B SITE SAFETY PLAN

2. JOB HAZARD ANALYSIS:

Hazard Level: High() Moderate() Low() Unknown ()

Hazard Type: Liquid() Solid() Sludge() Vapor/Gas()

Known or suspected hazardous materials present on site:

TPHG BTXE

Characteristics of hazardous materials included above:

(Complete for each chemical present:)

MATERIAL #1: Corrosive() Ignitable() Toxic()

Reactive() Volatile() Radioactive()

Biological Agent()

Exposure Routes: Inhalation() Ingestion() Contact()

MATERIAL #2: Corrosive() Ignitable() Toxic()

Reactive() Volatile() Radioactive()

Biological Agent()

Exposure Routes: Inhalation() Ingestion() Contact()

MATERIAL #3: Corrosive() Ignitable() Toxic()

Reactive() Volatile() Radioactive()

Biological Agent()

Exposure Routes: Inhalation() Ingestion() Contact()

MATERIAL #4: Corrosive() Ignitable() Toxic()

Reactive() Volatile() Radioactive()

Biological Agent()

Exposure Routes: Inhalation() Ingestion() Contact()

B&B SITE SAFETY PLAN

2.2 JOB-SPECIFIC HAZARDS

For each labor category, specify the possible hazards based information available (i.e., Task-driller, Hazards-trauma from drill rig accidents, etc.) For each hazard, indicate steps to be taken to minimize the hazard.

Jack Hammer and Air Compressor Noise

(Use Earplugs)

The following additional hazards are expected on site (i.e., snake-infested area, extreme heat, etc.):

Measures to minimize the effects of the additional hazards are:

3. MONITORING PLAN

3.1 (a) Air Monitoring Plan

Action levels for implementation of air monitoring. Action levels should be based on published data available on contaminants of concern. Action levels should be set by persons experienced in industrial hygiene.

Level (i.e., .5ppm)	Action Taken (i.e., commence perimeter monitoring)
------------------------	-------------------------------------------------------

<hr/>	<hr/> NA <hr/>
<hr/>	<hr/>
<hr/>	<hr/>

TPH-g
BTEX

B&B SITE SAFETY PLAN

*

(b) Air Monitoring Equipment

Outline the specific equipment to be used, calibration method, frequency of monitoring, locations to be monitored, and analysis of samples (if applicable):

NA

gas tech

If air monitoring is not to be implemented for this site, explain why:

We are not going into the tank, we are just removing
and disposing the tank.

3.2 Personnel Monitoring

(Include hierarchy of responsibilities in decision-making on the site).

NA

3.3 Sampling Monitoring

(a) Techniques used for sampling NA

B&B SITE SAFETY

(b) Equipments used for sampling_____

(c) Maintenance and calibration of equipments_____

4. **PERSONAL PROTECTIVE EQUIPMENT (PPE)**
Equipment used by employees for the site tasks and operations being conducted. Be specific (i.e., hard hat, impact resistance goggles, other protective glove, etc.).

Rubber gloves, Earplugs, Rubber Boots, Safety Glasses,
Protective Clothing, Hard Hats.

5. **SITE CONTROL AND SECURITY MEASURES**
The following general work zone security guidelines should be implemented:

- Work zone shall be barricaded and caution tape be used.
- Excavations shall be closed when drilling and sampling activities are not actually taking place.
- No excavations shall be left unattended. Visitors will not enter the work zone unless they have attended a project safety briefing.
- Persons will not leave the work zone without first passing through the decontamination zone.

B&B SITE SAFETY PLAN

6. DECONTAMINATION PROCEDURE

List the procedures and specific steps to be taken to decontaminate equipment and PPE.

All equipments has to be wash, soap and rinse.

Proetective clothing that had been contaminated

has to be dispose of properly.

7. TRAINING REQUIREMENTS

Prior to mobilization at the job site, employees will be attend a safety briefing. The briefing will include the nature of the wastes and the site, donning personal protection clothes and equipment, decontamination procedures and emergency procedures.

8. MEDICAL SURVEILLANCE REQUIREMENTS

If any task requires a very high personnel protection level, personnel shall provide assurances that they have received a physical examination and they are fit to do the task. Also, personnel will be instructed to look for any symptom of heat stress, heat stroke, heat exhaustion, or any other unusual symptom. If there is any report of that, it will be immediately be followed through, and appropriate action will be taken.

9. STANDARD OPERATION PROCEDURES

Bernabe & Brinker, Inc. is responsible for all Bernabe & Brinker, Inc. employees on the site. Each contractor shall provide all the equipment necessary to meet safe operation practices and procedures for their personnel on site, and be responsible for the safety of their workers.

A. "Three Warning" system is utilized to enforce compliance with Health and Safety procedures practices which will be implemented at the site for worker safety:

*Eating, drinking, chewing gum, or tobacco, and smoking will be allowed only in designated areas.

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

Certified: #P367 604 504

April 16, 1992

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

Mr. Leland Douglas
1721 Webster Street
Oakland, CA 94612

RE: Douglas Parking, 1721 Webster Street, Oakland

Dear Mr. Douglas:

On April 15, 1992, Britt Johnson and I inspected your facility. At that time you informed me that there are two underground storage tanks at the above site that have not been in operation for approximately a year.

In accordance to section 2670(c), Title 23, California Code of Regulations, an underground tank must be removed if the storage of hazardous substances has ceased and the tanks will not be used, or are not intended for use, for storage of hazardous substances within the next 12 consecutive months. If you intend to reuse your tanks within this timeframe, you must pay your fees for your operating permit immediately.

Please submit your permit fees for the underground tanks, or your closure plan with a deposit/refund check for \$681.00 made payable to the County of Alameda within 30 days of the receipt of this letter.

If you have any questions, please contact me at 271-4320.

Sincerely,

Larry Seto

Sr. Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney's Office
Consumer and Environmental Protection
Rich Hiatt, RWQCB
Howard Hatayama, DTSC
Rafat Shahid, Assistant Agency Director, Environmental Health
Britt Johnson, Hazardous Materials
Files

P 367 604 504

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1989-234-555

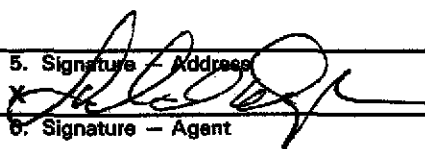
PS Form 3800, June 1985

Sent to	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

Complete lines 1 and 2 when additional services are desired, and complete lines 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

<p>3. Article Addressed to:</p> <p>Mr. Leland Douglas 1721 Webster Street Oakland, CA 94612</p>	<p>4. Article Number</p> <p>#P 367 604 504</p> <p>Type of Service:</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured</p> <p><input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD</p> <p><input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise</p> <p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>
<p>5. Signature - Addressee</p> <p>X </p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p>
<p>6. Signature - Agent</p> <p>X</p>	
<p>7. Date of Delivery</p> <p>4-70/92</p>	