

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
4-3-05

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. RO0000129, 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.

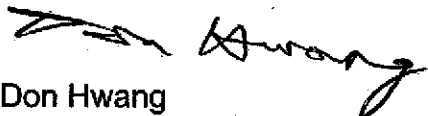
TECHNICAL REPORT REQUEST

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



9-04-03

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

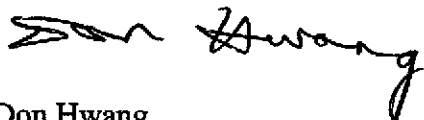
Please submit the following technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

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 that reads "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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



05-28-02

20129/2672.

May 23, 2002

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

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

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

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



04-30-02

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



08-16-01

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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3-3-2000

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

March 2, 2000
StID # 6124

Mr. Mike Dugan c/o
Elders Inn, LLC
801 Island Dr.
Alameda, CA 94501

No match.
Similar address:
1721 Webster St Oakland
94612 (20129)

Re: Recommendation for No Further Action at 1721 Webster St.,
Alameda CA 94501, Elders Inn

Dear Mr. Dugan:

This letter is to inform you that no further work will be required by our division at the above referenced site in regards to the removal of the one underground storage tanks (UST). Our office has received and reviewed the report by IMX, Inc. describing the removal of the 150 gallon heating oil tank. The results of soil sample analysis indicate there was no release of petroleum hydrocarbon.

Please be advised that this letter does not relieve you of any liability under the California Health and Safety Code or Water Code for past, present, or future operations at this site. Nor does it relieve you of the responsibility to clean up existing, additional or previously unidentified conditions at the site, which cause or threaten to cause pollution or nuisance or otherwise pose a threat to water quality or public health.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: B. Chan, file
Mr. P. MacIntyre, 850 5th Ave., Oakland CA 94606
Alameda Fire Dept., 1300 Park St., Alameda CA 94501
80-1721Webster

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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2-28-2000

20129

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SBT include co's
2-28-2000

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



SENT 2-18-2000
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ENVIRONMENTAL HEALTH S
ENVIRONMENTAL PROTECTION (LC
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 maybe 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



R0129

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



R0#129

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



R029

June 29, 1998
STID 4070

ENVIRONMENTAL HEALTH SERVICES

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

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 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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20129

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.

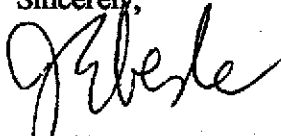
Until further notice, the wells should be monitored and sampled biannually (first and third quarters). MW1 need not be sampled any longer, due to the ND concentrations for four quarters, and its upgradient location.

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



R0#129

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

je.4070-D

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

RO#129

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

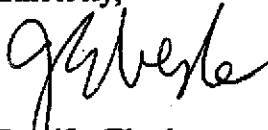
Therefore, you are requested to submit a workplan for a SWI, within 30 days, or by February 19, 1996. You have already had over 2 months to prepare the SWI workplan, from the time the SWRCB issued its last denial to your request. All work should adhere to a) the Tri-Regional Board Staff Recommendations 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
be Acting Chief/file

je.4070-C

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

R0129

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) 367-8700

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.**

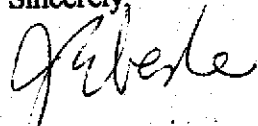
August 23, 1995
STID 4070
Attn: Leland Douglas
page 2 of 2

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



R0129

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

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0129

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



R0129

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

April 17, 1995
STID 4070

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

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

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,

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

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0129

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

December 23, 1994
STID 4070

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

Alameda County Environmental Health
Environmental Protection Division
1131 Harbor Bay Parkway, Rm. 250
Alameda, CA 94502-6577 CC:430-4510

Re: 1721 Webster St., Oakland, CA 94612

Dear Leland Douglas:

This office has received and reviewed a Soil and Groundwater Investigation and Quarterly Report for the above site by Gen-Tech Environmental dated December 2, 1994. The following comments are concerning this report:

1. Quarterly groundwater monitoring should continue, as stated on page 7.
2. The comment on page 7 concerning an off-site source with a plume that is commingling with this plume seems unfounded. A separate phase II investigation was done at 1750 Webster that did not find any sources on that property. To the contrary, very high petroleum contamination was discovered almost immediately across the street from the above site. This also appears to be down gradient from the above site. It would seem likely that the above site is the source for 1 plume, yet to be defined.

Do to this situation, you are directed to continue with a further investigation of contamination in the down gradient direction, including especially across the street. You must submit a workplan for further groundwater investigation to this office **within 30 days.**

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

Sincerely,

A handwritten signature in black ink 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



R0129

RAFAT A. SHAHID, Assistant Agency Director

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

July 12, 1994
STID ~~3507~~ ? 4070

Jonathan A. Conte
Frost & Jacobs
2500 PNC Center
201 East Fifth St.
P.O.Box 5715
Cincinnati, OH 45201-5715

Re: 1721 Webster St., Oakland, CA 94612

Dear Jonathan A. Conte:

This response is written as a result of your request, dated June 30, 1994, for information concerning the above site and the reason that John Morrell & Co. was named a Responsible Party. The attachment should answer your questions. The significant sections are highlighted.

As far as your other question of how much oversight cost have been incurred, a total of 26.2 hours have been charged. The average charge to you would be about \$75/hr. which would be \$1,965.

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
Jennifer Eberle - file
Gil Jensen, Alameda County District Attorney's Office

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0129

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, appearing to read '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, 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 2nd, 1994 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.)
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

DAVID J. KEARS, Agency Director



R0129

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

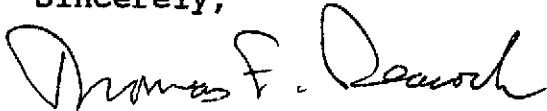
Please be advised this office is working in conjunction with the RWQCB to oversee the remediation of hydrocarbon contaminated sites such as these. the RWQCB is the agency entrusted to protect the waters of the state.

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

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

BC
R0129

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

A. Bacharach Trust &
B. Borsuk
1432 Harrison St.
Oakland, CA 94612

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

RE: Legal Designation of Responsible Party and Request for Submittal of a Technical Report Resulting from the Alameda County Department of Environmental Health's Enforcement Panel Meeting of August 31, 1993.

Dear Sirs:

It has been brought to my attention by Regional Board staff that a condition of soil 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 August 31, 1993, attended by Rich Hiett, of my staff. Pursuant to the Regional Board's authority under Section 13267(b) of the California Water Code, you are hereby found to be a responsible party as defined by Title 23 of the California Code of Regulations, Division 3, Chapter 16, Article 11, Section 2720. A Responsible Party is "any person who owned or operated the underground storage tank immediately before the discontinuation of its use." A responsible party also includes any owner of property from which an unauthorized release of a hazardous substance from an underground storage tank has occurred.

As a Responsible Party, you are required to conduct both soil and ground water investigations to determine the extent of environmental contamination resulting from the release. You are therefore directed to submit a technical report to address soil and ground water pollution at this site by October 15, 1993. This

Enforcement Panel Meeting
Page 2 of 2
STID 498

technical report should specifically address the following numbered items:

- 1) A proposal for the removal of the petroleum underground storage tanks and associated piping from the site. This should be submitted on ACHD forms and include a site safety plan;
- 2) A proposal to define the lateral and vertical extent of pollution in soil and ground water;
- 3) A plan for submission of quarterly monitoring reports on a regular and timely basis.

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.


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 report, or a submittal received after the date specified in this request may result in fines up to \$1,000 per day of delinquency. Please inform their office 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

DAVID J. KEARS, Agency Director



R0129
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

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0129

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.

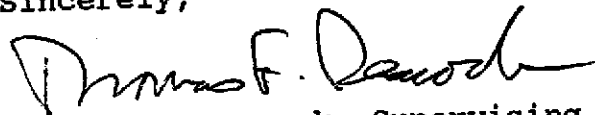
1721 Webster St., Oakland, CA 94612
STID 4070
February 22, 1993
Page 2 of 2

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 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



R5129

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

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0129

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 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
enclosures

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0129

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

March 14, 1991

Mr. Jonathan Leo
Heller, Ehrman, White & McAuliffe
333 Bush Street
San Francisco, CA 94104-2878

Dear Mr. Leo

I am in receipt of your Government Code Section 6250 request to inspect our files for the following addresses:

(R0129) 1721 Webster St.
(R0576) 420 13th Street
1833 Harrison Street (Not in Emission)
1424 Harrison Street (")

Please contact me at your earliest convenience to arrange a mutually acceptable time for the site search to take place.

Sincerely:

A handwritten signature in cursive script that reads "Paul M. Smith".

Paul M. Smith
Hazardous Materials Specialist

cc:

Mark Borsuk
Mark Thomson

AL