

RO 134

**Hwang, Don, Env. Health**

**From:** Khaled Rahman [krahman@lrm-consulting.com]  
**Sent:** Sunday, September 10, 2006 6:20 PM  
**To:** Hwang, Don, Env. Health  
**Cc:** Mehrdad Javaherian; Jonathan W. Redding; Phyllis Quintero; Drogos, Donna, Env. Health  
**Subject:** Former Val Strough Chevrolet, Oakland, CA - RO # 0134

Don,

As outlined in our recent submittals that were posted on the County ftp server -

\* LRM Consulting, Inc. (LRM) has recently taken over environmental consulting activities at the referenced site from ETIC Engineering, Inc. (ETIC);

\* ETIC shut down the dual-phase extraction (DPE) system on 30 June 2006 due to recurring problems with the electrical phase converter and the anticipated onset of modification of the system as described in their 3 March 2006 Work Plan. This Work Plan received significant comments in a

19 July 2006 Alameda County Department of Environmental Health (ACDEH) letter. The DPE system is not currently operating and ETIC has removed the skid-mounted DPE unit;

\* Our review of the system performance (e.g., declining extracted hydrocarbon concentration trends, asymptotic hydrocarbon mass removal rates, absence of hydrocarbon concentration rebound following several months of system shutdown) and site conditions (e.g., increasing concentrations in extraction well MW-2 immediately following system restart suggesting proximity to residual mass, stable hydrocarbon plume that is contained within the property boundaries) indicates that continued operation of the DPE system as configured is not recommended.

\* We recommend additional investigation of the former gasoline underground storage tank area, including soil-vapor sampling, to evaluate future approaches to site activities (e.g., health-based risk assessment and monitoring, reconfiguration of the DPE system, implementation of a different remedial approach). LRM recommended a technical meeting with the ACDEH to discuss these issues and determine a scope of work for the additional investigation with ACDEH in advance of preparation of the work plan.

As discussed during our 29 August 2006 telephone conversation, you indicated -

- \* your preference for a telephone discussion instead of a technical meeting;
- \* your general openness to additional investigation at the site;
- \* your understanding that the DPE system was not operating; and
- \* your anticipated schedule for review of the rationale for the technical meeting/discussion and recent monitoring report of approximately 2 months.

Nominal monthly equipment rental fees (e.g., carbon adsorption vessels) are anticipated to continue during this review. Your input on the corrective action approach is appreciated. We will followup with you to schedule a telephone discussion to review these issues. In the meantime, if you have any questions or comments, please do not hesitate to call me at 510-387-9552.

Thanks,

Khaled Rahman, P.G., C.Hg.  
LRM Consulting, Inc.  
1534 Plaza Lane, # 145  
Burlingame, CA 94010

August 25, 2006

Mr. Don Hwang  
Hazardous Materials Specialist  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway  
Alameda, California 94502-6577

RECEIVED

AUG 30 2006

ENVIRONMENTAL HEALTH SERVICE

Alameda County  
AUG 30 2006  
Environmental Health

Subject: **Project Update and Letter of Transmittal**  
Former Val Strough Chevrolet  
327 34<sup>th</sup> Street, Oakland, California  
Site ID #3035, RO#0000134

Dear Mr. Hwang:

LRM Consulting, Inc. (LRM) has prepared this correspondence regarding the status of activities at the referenced site. Specifically, the following notifies you of the recent change in project consultant and of the shutdown of the site remediation system by ETIC Engineering, Inc. (ETIC), and requests a technical meeting with the Alameda County Health Care Services Agency (ACHCSA) to discuss project direction and your recent comments on the 3 March 2006 *Work Plan for Well Installation and Remediation Enhancements* (Work Plan) by ETIC. Lastly, accompanying this correspondence is the *Second Quarter 2006 Groundwater Monitoring Report*.

**Consultant Change:** Last week, this project was transferred from ETIC to LRM. Please copy future correspondence related to this site to Khaled Rahman, P.G., C.Hg., the LRM project contact, at the letterhead address.

**Remediation System Shutdown:** Operation of the dual phase extraction (DPE) system was ceased by ETIC on 30 June 2006 due to frequent shutdowns caused by reported overheating of the electrical phase-converter since operation of the system was resumed on 22 May 2006. A review of the system performance suggests that continued operation of the remediation system in its current configuration is not recommended as indicated by:

- Declining total petroleum hydrocarbon as gasoline (TPH-g) concentration trends have been observed in extracted vapor and groundwater samples;
- Correspondingly, asymptotic TPH-g mass removal rates have been reached; and
- TPH-g concentrations did not increase (rebound) following the nearly four-month-long hiatus in system operation earlier this year (late January to late May 2006).

The system has remained shutdown pending approval to proceed with reconfiguration activities as proposed in ETIC's 3 March 2006 Work Plan. This Work Plan was met with significant comments in a 19 July 2006 ACHCSA letter. Consequently, additional investigation and/or remediation using the reconfigured system as proposed or with other modifications will be evaluated in consultation with your office.

**Technical Meeting Request:** Based on LRM's review of the available site data, the response of the hydrocarbon concentrations to past DPE operations, and the ACHCSA's comments on ETIC's Work Plan, LRM is of the opinion that a technical meeting is beneficial to discussing the project direction. As mentioned above, TPH-g mass removal rates are near asymptotic levels and operation of the remediation system in its current configuration is not efficient, nor likely to result in significant mass removal. Moreover, the groundwater monitoring results for the site suggest that the petroleum hydrocarbon plume is stable and entirely contained within the property boundaries despite the historical gasoline storage activities from approximately 1975 until underground storage tank removal in 1993. However, it is evident from DPE operations that a shallow residual source area may be present near the former underground storage tanks and dispenser, causing higher hydrocarbon concentrations in extraction well MW2. Investigation of this residual source area is recommended to determine the appropriate corrective action (e.g., risk assessment with monitoring, and/or reconfiguration and operation of the remediation system) for the site. A technical meeting is accordingly requested to discuss the above issues in advance of a work plan by LRM to perform the referenced investigation. We are available on 29 August and 6-8 September. Please let us know of your availability so we can coordinate accordingly.

We appreciate your assistance with this project. If you have any questions or require further information, please contact me at (510) 387-9552.

Sincerely,  
LRM CONSULTING, INC.



Khaled B. Rahman, P.G., C.Hg.  
Senior Geologist

Enclosure: Second Quarter 2006 Groundwater Monitoring Report

cc: ✓ Donna Dragos, Alameda County Health Care Services Agency, 1131 Harbor Bay Parkway, Alameda, California 94502-6577 (w/o enclosure)  
Jonathan Redding, Esq., Wendel Rosen Black & Dean, 1111 Broadway, 24th Floor, Oakland, California 94607  
Greggory Brandt, Esq., Wendel Rosen Black & Dean, 1111 Broadway, 24th Floor, Oakland, California 94607  
Don Strough, Strough Family Trust, P.O. Box 489, Orinda, California 94563

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



7

July 19, 2006

Don Strough  
Strough Family Trust of 1983  
PO Box 489  
Orinda, CA 94563

Jessco Ltd & Cocraig Ltd  
100 the Embarcadero Pent  
San Francisco, CA 94105

Ron Hendrick  
4345 Rosewood Dr.  
Pleasanton, CA 94588

Dear Mr. Strough, Mr. Hendrick, Sir/Madam:

Subject: Fuel Leak Case No. [REDACTED] Val Strough Chevrolet, 327-34<sup>th</sup> St.,  
Oakland, CA

Alameda County Environmental Health staff has reviewed "The Work Plan for Well Installation and Remediation Enhancements" dated March 3, 2006 by ETIC Engineering, Inc. The Work Plan is disapproved. It is incomplete. We request that you address the following technical comments and send us the technical reports requested below.

#### TECHNICAL COMMENTS

1) Rationale For The Design –

- a) The Work Plan proposes to connect wells MW8, MW9, and MW10 to the DPE system. However, the Work Plan does not show how the length of time required for remediation of the site will be shorten as proclaimed. In fact, an evaluation of the DPE system determined that the system does not operate efficiently while simultaneously extracting from two wells. Please explain.
- b) The proposed wells will be used for groundwater monitoring as well as extraction. How will these wells be screened to collect depth discrete groundwater samples and specifically target the shallow zone of impacted soil? Please explain.

2) Operation And Monitoring Plans –

- a) Start-Up Operations – Not provided. The start-up phase of operations for single-pump DPE systems will require days of adjustments in the vacuum pump settings and the depth of the extraction tube inlet. The start-up

ENVIRONMENTAL HEALTH SERVICES  
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Alameda, CA 94502-6577  
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phase should also include manifold valving adjustments. These adjustments should balance flow between the wells within the system. To optimize DPE effectiveness, flow measurements, pressure or vacuum readings, carbon dioxide concentrations, oxygen concentrations, and volatile organic compound (VOC) concentrations should be recorded daily from each extraction well, from the manifold, and from the effluent stack during the start up adjustment period. These measurements can be used to decide how to best operate the system. Please provide Start-Up Operations Plan.

- b) Long-Term Operations - Long-term monitoring should consist of flow-balancing, flow and pressure measurements, in addition to vapor concentration readings. Measurements are commonly made at weekly or biweekly intervals for the duration of the system operational period. Please revise Long-Term Operations Plan.
- c) Remediation Progress Monitoring - To evaluate the performance of the remediation system, collection of groundwater samples from the extraction wells is proposed. Monitoring the performance of the DPE system in reducing contaminant concentrations in soils is necessary to track the progress of remediation. Since concentrations of petroleum constituents may be reduced due to both volatilization and biodegradation, both processes should be monitored in order to track their cumulative effect. Please revise Remediation Progress Monitoring Plan.

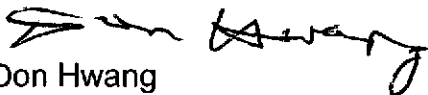
#### TECHNICAL REPORT REQUEST

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

July 31, 2006 - 2<sup>nd</sup> Quarter 2006 Groundwater Monitoring Report  
September 19, 2006 - Addendum to The Work Plan for Well Installation and Remediation Enhancements, 4<sup>th</sup> Quarter 2004 Groundwater Monitoring Report

If you have any questions, I may be reached at (510) 567-6746.

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Katherine Brandt, ETIC Engineering, Inc., 1333 Broadway, Suite 1015, Oakland, CA  
94612  
Donna Drogos  
File

R0134

**Hwang, Don, Env. Health**

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**From:** Hwang, Don, Env. Health  
**Sent:** Wednesday, October 26, 2005 3:04 PM  
**To:** 'Kathy Brandt'  
**Subject:** RE: Fuel Leak Case No. [REDACTED]

ok

-----Original Message-----

**From:** Kathy Brandt [mailto:KBrandt@eticeng.com]  
**Sent:** Wednesday, October 26, 2005 3:07 PM  
**To:** Hwang, Don, Env. Health  
**Subject:** Fuel Leak Case No. R00000134

Don,

ETIC would like to request an extension for the due date on the 3rd quarter 2005 Groundwater Monitoring and Interim Remedial Action Report for the former Val Strough. It is currently due on October 31, 2005.

ETIC would like it extended to November 14, 2005 (2 weeks). ETIC will proceed with this as a due date unless otherwise contacted. Thank you for your understanding.

Regards,

Katherine Brandt  
ETIC Engineering, Inc.  
1333 Broadway, Suite 1015  
Oakland, CA 94612  
510.208.1600 ext 11

R0134

**Hwang, Don, Env. Health**

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**From:** Kathy Brandt [KBrandt@eticeng.com]  
**Sent:** Tuesday, March 01, 2005 5:15 PM  
**To:** Hwang, Don, Env. Health  
**Cc:** Khaled Rahman  
**Subject:** Strough Family Trust 327 34th Street, Oakland, California - Site ID# 3035

Don,

For the above-referenced site, ETIC would like to request an extension for the Fourth Quarter 2004 Groundwater Monitoring and Interim Remedial Action Report that is due March 4, 2005. ETIC anticipates the report will be submitted no later than March 11, 2005. Please email an approval of this extension at your earliest convenience.

Katherine Brandt  
ETIC Engineering, Inc.  
1333 Broadway, Suite 1015  
Oakland, CA 94612  
510.208.1600 ext 11

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**

AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

February 4, 2005

Don Strough  
Strough Family Trust of 1983  
PO Box 489  
Orinda, CA 94563

Jessco Ltd & Cocraig Ltd  
100 the Embarcadero Pent  
San Francisco, CA 94105

Ron Hendrick  
4345 Rosewood Dr.  
Pleasanton, CA 94588

Dear Mr. Strough, Mr. Hendrick, Sir/Madam:

Subject: Fuel Leak Case No. RO0000134, Val Strough Chevrolet, 327-34<sup>th</sup> St.,  
Oakland, CA

Alameda County Environmental Health staff has reviewed "Technical Response to the August 20, 2004 Alameda County Health Cares Services Agency Correspondence" dated October 26, 2004 by ETIC Engineering, Inc. We are agreeable to your initiation of Dual Phase Extraction (DPE) proposed for interim remediation of free product. We request that you incorporate the following technical comments, perform the requested work, and send us the technical reports requested below.

#### TECHNICAL COMMENTS

Verification Monitoring of Dual Phase Extraction (DPE) interim remediation - Please propose sampling or other monitoring of soil and/or water for such period of time and intervals to evaluate its effectiveness as an Addendum to your "Interim Remedial Action Plan".

#### TECHNICAL REPORT REQUEST

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

March 4, 2005 - Addendum to DPE Interim Remedial Action Plan, 4<sup>th</sup> Quarter 2004  
Groundwater Monitoring Report



Mr. Strough  
February 4, 2005  
Page 2 of 2

April 30, 2005 - 1st Quarter 2005 Groundwater Monitoring Report, DPE Interim Remedial Action Report  
July 31, 2005 - 2<sup>nd</sup> Quarter 2005 Groundwater Monitoring Report, DPE Interim Remedial Action Report  
October 31, 2005 -Work Plan; 3<sup>rd</sup> Quarter 2005 Groundwater Monitoring Report; DPE Interim Remedial Action Report  
January 31, 2006 - 4<sup>th</sup> Quarter 2005 Groundwater Monitoring Report, DPE Interim Remedial Action Report

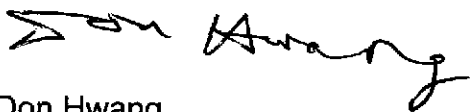
These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

#### PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

If you have any questions, I may be reached at (510) 567-6746.

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Katherine Brandt, ETIC Engineering, Inc., 1333 Broadway, Suite 1015, Oakland, CA  
94612  
Donna Drogos  
File

# 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		<b>FOR LOCAL AGENCY USE ONLY</b> 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 1_M 0_M 2_D 6_D 0_Y 4_Y		CASE # <u>ACHCSA</u> R00000134		SIGNED _____ DATE _____		
REPORTED BY	NAME OF INDIVIDUAL FILING REPORT <u>Khaled Kahman</u>		PHONE <u>1510 1208 1600</u>	SIGNATURE 		
	REPRESENTING <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> LOCAL AGENCY <input checked="" type="checkbox"/> OTHER <u>Co. 134 TANK TO SPT</u>		COMPANY OR AGENCY NAME <u>ETIC Engineering INC</u>			
ADDRESS <u>1333 Broadway</u> STREET <u>Suite 1015</u> CITY <u>Oakland</u> STATE <u>CA</u> ZIP <u>94612</u>						
RESPONSIBLE PARTY	NAME <u>Stough Family Trust (SPT)</u> <input type="checkbox"/> UNKNOWN		CONTACT PERSON <u>Don Stough</u>		PHONE <u>1510 1588 2338</u>	
	ADDRESS <u>Po Box 489</u> STREET CITY <u>Orinda</u> STATE <u>CA</u> ZIP <u>94563</u>					
SITE LOCATION	FACILITY NAME (IF APPLICABLE) <u>Former Val Stough</u>		OPERATOR <u>Stough Family Trust</u>		PHONE <u>1510 1588 2338</u>	
	ADDRESS <u>327 34th Street</u> STREET CITY <u>Oakland</u> COUNTY <u>Alameda</u> ZIP <u>94609</u>					
	CROSS STREET <u>Broadway</u>					
IMPLEMENTING AGENCIES	LOCAL AGENCY <u>Alameda County Health Care Services</u>		AGENCY NAME <u>(ACHCSA)</u>		CONTACT PERSON <u>Don Hwang</u>	
	REGIONAL BOARD <u>SF Bay RWQCB (Region 2)</u>		CONTACT PERSON <u>Betty Graham</u>		PHONE <u>1510 1567 6746</u>	
SUBSTANCES INVOLVED	(1) NAME <u>Gasoline - Automotive</u>				QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN	
	(2) _____ <input type="checkbox"/> UNKNOWN					
DISCOVERY/ABATEMENT	DATE DISCOVERED <u>0_M 3_M 0_D 4_Y 9_Y 3_Y</u>		HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> TANK TEST <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> OTHER _____			
	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 <u>0_M 3_M 0_D 4_Y 9_Y 3_Y</u>					
SOURCE/ CAUSE	SOURCE OF DISCHARGE <input checked="" type="checkbox"/> TANK LEAK <input type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER _____		CAUSE(S) <input type="checkbox"/> OVERFILL <input checked="" type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL <input type="checkbox"/> CORROSION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER _____			
	CASE TYPE CHECK ONE ONLY <input type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input checked="" type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)					
CURRENT STATUS	CHECK ONE ONLY <input 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 checked="" type="checkbox"/> REMEDIATION PLAN <input type="checkbox"/> CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> CLEANUP UNDERWAY					
	REMEDIAL ACTION CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS) <input checked="" type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> VENT SOIL (VS) <input type="checkbox"/> VACUUM EXTRACT (VE) <input checked="" type="checkbox"/> OTHER (OT) <u>High Vacuum Dual Phase Extraction</u>					
COMMENTS	UNAuthorized Release Form may have been previously submitted for this site. Form re-filed based on information from Geotracker website as requested in 20 August 2004 ACHCSA letter.					
	_____					

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

August 20, 2004

Don Strough  
Strough Family Trust of 1983  
PO Box 489  
Orinda, CA 94563

Jessco Ltd & Cocraig Ltd  
100 the Embarcadero Pent  
San Francisco, CA 94105

Ron Hendrick  
4345 Rosewood Dr.  
Pleasanton, CA 94588

Dear Mr. Strough, Mr. Hendrick, Sir/Madam:

Subject: Fuel Leak Case No. RO0000134, Val Strough Chevrolet, 327-34<sup>th</sup> St., Oakland, CA

Alameda County Environmental Health staff has reviewed "Dual Phase Extraction (DPE) Pilot Test Report and Interim Remedial Action Plan" dated June 25, 2004, by ETIC Engineering, Inc. We generally concur with the DPE work proposed for interim remediation of free product. We request that you incorporate the following technical comments, perform the requested work, and send us the technical reports requested below.

#### TECHNICAL COMMENTS

- 1) Limit Drawdown in Extraction Wells MW-2 and MW-3 – The depth of groundwater extraction needs to be limited to the depth of the plume to prevent drawdown to the deeper coarser soil where the contaminated plume could be disseminated. Limiting drawdown will also reduce the volume of uncontaminated groundwater extracted. Please indicate how drawdown will be limited.
- 2) Source Characterization - 10,000 mg/kg Total Petroleum Hydrocarbons-Gasoline (TPH-G) and 100 mg/kg benzene were detected in the soil boring at 19.5 to 21 feet below ground surface (bgs) from MW-2. Thus, the lateral and vertical extent of soil contamination by the adjacent underground tank and dispenser needs to be delineated. We request that you propose additional borings to delineate the lateral and vertical extent of soil contamination in the source area. Please propose boring locations in the Work Plan requested below.
- 3) Soil Contamination above MW-2's Screen - Up to 2,000 mg/kg TPH-G and 7.2 mg/kg benzene were detected in the soil borings above MW-2's screen at 15 feet bgs. The DPE

proposed appears to be inadequate to remediate the residual soil contamination in this area. Please submit a proposal to remediate the residual soil contamination in this area in the Work Plan requested below.

- 4) *DPE* Operation & Monitoring Plans - The start-up phase should include daily monitoring of flow measurements, constituent concentrations, and vacuum readings for at least 1 week. Please also report these same parameters from weekly system operation in the interim remedial action reports.
- 5) Preferential Pathway Survey –
  - a) Utility Survey - Utility map(s) were included in the September 17, 2003 submittal prepared by ETIC Engineering. However, an evaluation of 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 was omitted. Include in cross-sections 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). Please submit with the Work Plan requested below.
  - b) Well Survey – Locate wells within a quarter mile radius of the site. A map showing the location of the wells and the site and a table with well construction details were included in the September 17, 2003 submittal prepared by ETIC Engineering. Evaluate the probability of the contaminant plumes encountering wells that could spread the contamination, particularly in the vertical direction to deeper water aquifers. Please submit with the Work Plan requested below.
- 6) "Underground Storage Tank Unauthorized Release (Leak) / Contamination Site Report" - Please complete (enclosed).
- 7) Groundwater Analytical Tables – "Table 2 Cumulative Groundwater Analytical Data" did not 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 the lead scavengers, EDB and EDC. Please include these results in tables.

#### TECHNICAL REPORT REQUEST

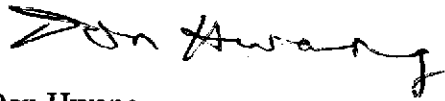
Please submit the following technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

- October 31, 2004 - Work Plan; 3<sup>rd</sup> Quarter 2004 Groundwater Monitoring Report; ~~DPE Interim Remedial Action Report~~  
60 days after Work Plan approval - Soil and Water Investigation Report  
January 31, 2005 - 4<sup>th</sup> Quarter 2004 Groundwater Monitoring Report; ~~DPE Interim Remedial Action Report~~  
April 30, 2005 - 1st Quarter 2005 Groundwater Monitoring Report, DPE Interim Remedial Action Report  
July 31, 2005 – 2<sup>nd</sup> Quarter 2005 Groundwater Monitoring Report

Mr. Strough  
August 20, 2004  
Page 3 of 3

If you have any questions, I may be reached 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 underline.

Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: ✓ Katherine Brandt, ETIC Engineering, Inc., 1333 Broadway, Suite 1015, Oakland, CA 94612  
Donna Drogos  
File

Enclosure

August 9, 2004

Mr. Donald Strough  
Strough Family Trust of 1983  
2 Sea View Avenue  
Piedmont, California 94611

Subject: Fuel Leak Case No. O0000134, Val Strough Chevrolet, 327 34<sup>th</sup> Street, Oakland, CA

Dear Mr. Strough:

Alameda County Health Care Services Agency (ACHCSA) staff has reviewed the June 25, 2004 *Dual Phase Extraction Pilot Test Report and Interim Remedial Action Plan* prepared by ETIC Engineering, Inc. (ETIC) for the referenced site. This document presents the findings of a recent dual phase extraction (DPE) pilot test and proposes site remediation using temporary DPE from wells MW-2 and MW-3 for source area cleanup which will be followed by natural attenuation for further hydrocarbon reduction. We concur with the recommended scope of work proposed in the June 25, 2004 report.

If you have any questions, I may be reached at (510) 567-6746.

Sincerely,

Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

cc: Katherine Brandt, ETIC Engineering, Inc. 1333 Broadway, Suite 1015, Oakland, CA 94612  
Donna Drogos  
File



July 27, 2004

Mr. Don Hwang  
Hazardous Materials Specialist  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway  
Alameda, California 94502-6577

Alameda County  
JUL 30 2004  
Environmental Services

**RE:** Former Val Strough Chevrolet  
327 34<sup>th</sup> Street, Oakland, California  
Fuel Leak Case No. RO0000134

Dear Mr. Hwang:

On behalf of Strough Family Trust of 1983, ETIC Engineering, Inc. (ETIC) has prepared this correspondence to request your expedited approval of the planned interim remedial action activities using dual phase extraction at the above-referenced site. These activities were described in the 25 June 2004 *Dual Phase Extraction Pilot Test Report and Interim Remedial Action Plan* (DPE Report and IRAP).

As summarized in recent reports, the primary sources (gasoline and used oil underground storage tanks [USTs] and associated dispenser) were removed in 1993, and, although separate phase hydrocarbons are intermittently observed in wells near the former tank locations, the hydrocarbon plume is stable to declining and largely limited to the property boundaries. As described in the DPE Report and IRAP, temporary DPE is proposed as an interim remedial action to reduce the residual source and shorten the duration of the project. Alternatively, the removal of the primary source and stability of the plume suggests that natural attenuation could sufficiently reduce the hydrocarbon concentrations over a longer (but reasonable) duration.

As mentioned during multiple telephone conversations and documented in a 22 April 2004 ETIC letter and the DPE Report and IRAP, system installation must be coordinated with site redevelopment activities to minimize impacts to business operations and maintain cost-effectiveness. Redevelopment activities are anticipated to begin shortly.

To proceed with installation of the temporary DPE system in concert with site redevelopment and ensure reimbursement from the California UST Cleanup Fund, ETIC requests your expedited approval of the DPE Report and IRAP. If Alameda County Health Care Services Agency (ACHCSA) approval is not received within 10 working days, the coordination of site activities required to maintain cost-effectiveness may be missed. If this opportunity is missed, we will likely pursue site closure through natural attenuation, rather than active source cleanup.

On several occasions, you have mentioned that other sites in your case load are a higher priority and you do not currently have the time to review ETIC's reports for this site. This position is inconsistent with the regulatory requirements presented in the 15 July 2003 ACHCSA letter. ETIC has made you aware of the need to coordinate the redevelopment and system installation activities and receive your approval in a timely manner; however, we acknowledge that this site does not appear to pose a significant threat to health or the environment and other sites in your case load may pose such threat. To facilitate your approval of the DPE Report and IRAP, we have attached a draft approval letter for your use.

We appreciate your assistance with this project. If you have any questions, please call me at (510) 208-1600 ext. 11.

Sincerely,  
**ETIC ENGINEERING, INC.**

*Katherine Brandt*

Katherine Brandt  
Project Manager

Attachment

Cc: Mr. Donald Strough, Strough Family Trust, 2 Sea View Avenue, Piedmont, California 94611  
Mr. Jonathan Redding, Esq., Wendel Rosen Black & Dean, 1111 Broadway, 24<sup>th</sup> Floor, Oakland, California 94607  
Ms. Donna Drogos, ACHCSA, 1131 Harbor Bay Parkway, Alameda, California 94502



## Hwang, Don, Env. Health

---

**From:** Hwang, Don, Env. Health  
**Sent:** Tuesday, November 04, 2003 3:47 PM  
**To:** 'Luis Fraticelli'  
**Subject:** RE: Val Strough Supplemental Investigation Workplan

Luis, Approved. Don

-----Original Message-----

**From:** Luis Fraticelli [mailto:LFraticelli@eticeng.com]  
**Sent:** Tuesday, October 28, 2003 1:35 PM  
**To:** DHwang@co.alameda.ca.us  
**Subject:** RE: Val Strough Supplemental Investigation Workplan

Don:

The deepest soil samples collected and tested were at 24.5 feet bgs (MW2 and MW3) and the highest concentrations reported at that depth was TPH-g at 19 mg/kg (both samples) and benzene at 1.9 and 1.4 mg/kg. These represent significant decreases from the next shallower samples at 19.5 to 21 ft bgs (TPH-g at 10,000 and 1,400 mg/kg and benzene at 100 and 6.4 mg/kg). The reason for the large decrease is most likely due to the fact that the deeper soil samples are saturated samples and the contaminants are being dissolved into the groundwater. TPH-g and benzene are somewhat volatile contaminants and will tend to dissolve into the aqueous phase and travel with the groundwater and not sink to deeper depths. We believe our proposed sampling depths of 30 and 35 feet bgs will provide the vertical profile requested and there is no need to try and sample an impervious soil horizon deeper than our proposed depth. We will be field screening with a PID and if field readings suggest deeper samples are required we will make that determination in the field.

Please let us know of your thoughts-I do appreciate the dialogue.

Luis

Luis A. Fraticelli

ETIC Engineering, Inc.  
1333 Broadway, Suite 1015  
Oakland, CA 94612  
Phone (510) 208-1600 x16  
Fax (510) 208-1604  
Cell (510) 812-4780

>>> "Hwang, Don, Env. Health" <DHwang@co.alameda.ca.us> 10/24/03  
09:55AM >>>

Luis, What do you think about? 5)if permeable at 35', continuous core until impervious.

-----Original Message-----

**From:** Luis Fraticelli [mailto:LFraticelli@eticeng.com]  
**Sent:** Wednesday, October 22, 2003 12:11 PM  
**To:** dhwang@co.alameda.ca.us  
**Cc:** Mehrdad Javaherian  
**Subject:** Val Strough Supplemental Investigation Workplan

Don:

Thank you for timely review and preliminary responses to the Supplemental Site Investigation Workplan dated September 17, 2003.

Let me reiterate your comments and present our responses (in italic). Please let me know if I have misinterpreted your comments:

- 1). The County would like to have ethanol added to analytical suite for analysis in future groundwater monitoring. The third quarter groundwater sampling has been already been completed but, ETIC will add ethanol to the fourth quarter analytical analysis. We understand this to be a one-time analysis request unless ethanol is detected.
- 2). The County would like to have a statement be included in Section 4.0 Preferential Pathway Survey stating whether the underground utilities act as preferential conduits for contaminant migration. If the County agrees ETIC would like to include the Preferential Pathway Survey (including conclusions reached in the survey) in the Supplemental Site Investigation Report.
- 3). The County would like to have the depths of the utilities included in the Utility Figure included in Appendix C. ETIC will include the depths to the utilities shown on the Figure in Appendix C and will include it with Supplemental Site Investigation Report as described in #2.
- 4). The County commented on the need for a Rose diagram. ETIC presented a Rose diagram on Figure 3-the County acknowledged.
- 5). The County asked that the soil borings be advanced deeper than 25 ft. bgs. ETIC has proposed soil borings down to 35 ft bgs (see subsection 3.1.2, page 7). ETIC believes that samples collected at 35 ft bgs will define the vertical extent of contamination. The deepest soil samples previously collected were at 25 ft bgs and the contaminant concentrations were very low (maximum values of TPH-g at 19 mg/kg and benzene at 1.9 mg/kg).

The supplemental investigation is designed to collect additional data that will be used for completing the site characterization and evaluating potential remedial options for reducing the HC mass in soil.

ETIC recommends, if the County agrees, that the Supplemental Investigation Workplan be approved with the above comments and responses and that the County prepare an approval letter to the UST Cleanup Fund.

I understand you are very busy and because the UST Cleanup Fund pre-approval process takes at least 30-days, ETIC would be happy to draft a approval letter for your review and approval, if you agree.

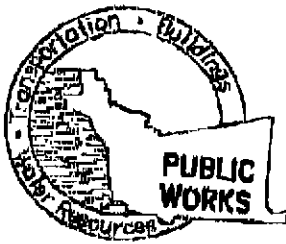
Looking forward to working with you on this project-

Luis

Luis A. Fraticelli

ETIC Engineering, Inc.  
1333 Broadway, Suite 1015  
Oakland, CA 94612  
Phone (510) 208-1600 x16

Ro 134



COUNTY OF ALAMEDA  
PUBLIC WORKS AGENCY  
WATER RESOURCES SECTION  
399 Elmhurst Street, Hayward, CA 94544-1395  
James Yoo PH: (510) 670-6633 FAX (510) 782-1939

WELL COMPLETION REPORT RELEASE AGREEMENT—AGENCY  
(Government and Regulatory Agencies and their Authorized Agents)

Project/Contract No. TMSPT1 County ALAMEDA  
Township, Range, and Section 327 34th St, OAKLAND, CA  
(Must include entire study area and a map that shows the area of interest.) Radius 1/2 MILE

Under California Water Code Section 13752, the agency named below requests permission from Department of Water Resources to inspect or copy, or for our authorized agent named below to inspect or copy, Well Completion Reports filed pursuant to Section 13751 to (check one):

- Make a study, or,
- Perform an environmental cleanup study associated with an unauthorized release of a contaminant within a distance of 2 miles.

In accordance with Section 13752, information obtained from these reports shall be kept confidential and shall not be disseminated, published, or made available for inspection by the public without written authorization from the owner(s) of the well(s). The information shall be used only for the purpose of conducting the study. Copies obtained shall be stamped **CONFIDENTIAL**, and shall be kept in a restricted file accessible only to agency staff or the authorized agent.

ETIC ENGINEERING  
Authorized Agent

1333 BROADWAY, Ste. 1015  
Address

OAKLAND, CA 94612  
City, State, and Zip Code

J. O. Fraticelli  
Signature

Senior Project Manager  
Title

(510) 208-1600 ext. 16  
Telephone

(510) 208-1604  
Fax

9/12/03  
Date

lfraticelli@eticeng.com  
E-mail

ALAMEDA COUNTY ENVIRONMENTAL HEALTH  
Government or Regulatory Agency

101 HARBOR BAY PARKWAY #250  
Address

ALAMEDA, CA 94502  
City, State, and Zip Code

Don Hwang  
Signature

HAZARDOUS MATERIALS SPECIALIST  
Title

(510) 567-6746  
Telephone

(510) 337-9335  
Fax

9/12/03  
Date

dhwang@ca.alameda.ca.us  
E-mail

2003.09-12 13:24  
510 337 9335  
ALAMEDA CO EHS HAZ-OPS

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**ALAMEDA COUNTY ENVIRONMENTAL HEALTH DEPARTMENT**  
**Division of Environmental Protection**

**1131 HARBOR BAY PARKWAY, SUITE 250**  
**ALAMEDA, CA 94502-6577**  
**Telephone (510) 567-6700 FAX (510) 337-9335**

**F A C S I M I L E C O V E R S H E E T**

To: BRYAN GILBERT

From: DON HWANG

Date: 9/12/03

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

July 15, 2003

Don Strough  
Strough Family Trust of 1983  
PO Box 489  
Orinda, CA 94563

Dear Mr. Strough:

Subject: Fuel Leak Case No. RO0000134, Val Strough Chevrolet, 327-34<sup>th</sup> St., Oakland, CA

Alameda County Environmental Health staff has reviewed "Site Investigation and Groundwater Monitoring... November 2001 to November 2002", dated January 8, 2003, by Subsurface Consultants, Inc. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

1. Site Characterization - Up to 330,000 micrograms/liter (ug/l) Total Volatile Petroleum Hydrocarbons-Gasoline (TVPH-G), 31,000 ug/l TEH-Diesel (TEH-D), 2,500 ug/l TEH-Oil (TPH-O), 10,000 ug/l benzene, and 5,800 ug/l methyl tertiary-butyl ether (MTBE) have been detected in onsite monitoring wells. The lateral and vertical extent of your dissolved contaminant plume is undefined. Please propose additional sampling locations to define the plumes associated with your site in the Work Plan requested below. Include geologic cross-sections and show soil and groundwater analytical results, utility conduits, well screens, etc., and explain your rationale for the additional sampling locations. You may want to consider performing an investigation to quickly define the location of the contaminant plume downgradient from the release site prior to installing the permanent monitoring network. That will allow you to optimize the location and depth of the permanent wells, thereby reducing the cost of the monitoring work. Collection of groundwater samples using a one-time direct push water sampling tool would be appropriate for this investigation.
2. Source Characterization - Up to 10,000 mg/kg Total Petroleum Hydrocarbons-Gasoline (TPH-G) and 1,400 mg/kg TPH-G were detected in contaminated soil collected from downgradient borings MW-2 and MW-3. Thus, the source area has not been delineated. We request that you propose additional borings to delineate the lateral and vertical extent of soil contamination in the source area. Please propose boring locations in the Work Plan requested below.

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.
  - a) Utility Survey - 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 with the Work Plan requested below.
  - b) 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 with the Work Plan requested below.
4. 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.
5. “Underground Storage Tank Unauthorized Release (Leak) / Contamination Site Report” - Please complete (enclosed).
6. Groundwater Monitoring Frequency – Currently all the wells are sampled semiannually. Due to the high contaminant concentrations found and to better determine the effect of the residual soil contamination on the groundwater plume, please increase the monitoring frequency to quarterly.
7. 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.
8. Source Cleanup Required - The soil contamination in the source area appears to be contributing to the high contaminant concentrations in groundwater. Please submit a proposal to reduce residual soil contamination in the Work Plan requested below.

#### TECHNICAL REPORT REQUEST

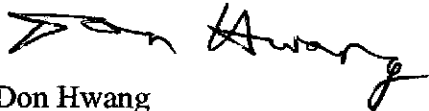
Please submit the following technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

Mr. Strough  
July 15, 2003  
Page 3 of 3

- September 15, 2003 - Work Plan
- October 31, 2003 - 3<sup>rd</sup> Quarter 2003 Groundwater Monitoring Report
- 60 days after Work Plan approval - Soil and Water Investigation Report
- January 31, 2004 - 4<sup>th</sup> Quarter 2003 Groundwater Monitoring Report

If you have any questions, I may be reached at (510) 567-6746.

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Katherine Brandt, ETIC Engineering, Inc., 1333 Broadway, Suite 1015, Oakland, CA 94612  
Donna Drogos  
File



June 9, 2003

Mr. Don Hwang  
Hazardous Materials Specialist  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway  
Alameda, California 94502-6577

Alameda County  
JUN 13 2003  
Environmental Health

RE: Strough Family Trust 327 34<sup>th</sup> Street, Oakland, California  
Site ID# 3035

Dear Mr. Hwang:

ETIC Engineering, Inc. (ETIC) has prepared this correspondence to advise you of a change in the environmental consultant for the referenced site. Please direct all future correspondences related to the site to my attention at ETIC (see address on letterhead). It is also my understanding that the Subsurface Consultants, Inc. had requested a reduction in monitoring (from semi-annual to annual) of groundwater as part of the last report titled *Site Investigation and Groundwater Monitoring Program Activities Conducted November 2001 to November 2002* (dated January 8, 2003). Please let us know of your decision regarding the proposed reduction in monitoring.

If you have any questions, please call me at (510) 208-1600 ext. 11.

Sincerely,  
**ETIC Engineering, Inc.**

A handwritten signature in cursive script that reads "Katherine Brandt".

Katherine Brandt

Cc: Mr. Don Strough, Strough Family Trust, 2 Sea View Avenue, Piedmont, California 94611  
Mr. Gregory Brandt, Esq., Wendel Rosen Black & Dean, 1111 Broadway, 24<sup>th</sup> Floor, Oakland, California 94612





# State Water Resources Control Board



**Winston H. Hickox**  
*Secretary for  
Environmental  
Protection*

## 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](http://www.swrcb.ca.gov/cwphome/ustcf)

**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](http://www.swrcb.ca.gov).*

April 23, 2001

Don Strough  
Strough Family Trust Of 1983  
P O Box 489  
Orinda, CA 94563.

**REQUEST FOR PRE-APPROVAL OF CORRECTIVE ACTION COSTS,  
CLAIM NO. 009198, PA # 4  
SITE ADDRESS: 327 34<sup>TH</sup> AVE, OAKLAND, CA 94611**

I have reviewed your request, received on March 28, 2001, 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 denies your request for pre-approval. You have requested Pre-approval for two years for Quarterly Monitoring Events. However, per Alameda County Health Services "ACHSA" letter dated February 28, 2001, Mr. Hwang has directed you to collect another round of groundwater samples, after which the monitoring frequency will be re-evaluated. Please submit a cost proposal/Pre-approval request for one round of Groundwater monitoring and free product removal at this time. If additional work is requested by ACHSA in the future, you may submit a Pre-approval request at that time.

If you have any questions, don't hesitate to call me. I can be reached at (916) 341-5757.

Sincerely,

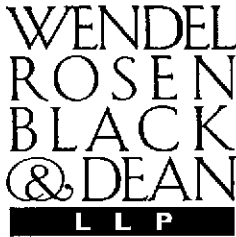
*Sunil Ramdass*

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

Enclosure

cc: Don Hwang  
Alameda County EHD  
✓ 1131 Harbor Bay Pkway, 2 nd. Fl.  
Alameda, CA 94502-6577

*California Environmental Protection Agency*



Attorneys at Law

1111 Broadway, 24th Floor  
Oakland, CA 94607-4036

Post Office Box 2047  
Oakland, CA 94604-2047

Telephone: (510) 834-6600  
Fax: (510) 834-1928  
info@wendel.com

MAR 30 2001

March 26, 2001

Ms. Sofie Paredes  
Underground Storage Tank Fund Program  
State Water Resources Control Board, Division of Clean Water  
2014 T. Street, Suite 130  
P.O. Box 944212  
Sacramento, CA 94244-2120

**Re: California UST Cleanup Fund Cost Pre-Approval Request  
Claim No. 9198, 327 34th Street, Oakland, California**

Dear Ms. Paredes:

This letter is to submit the necessary documentation for pre-approval of additional investigation and monitoring costs, as required by the Alameda County Health Care Services Agency ("ACHCSA") in their February 28, 2001 letter, at the above-mentioned site. A copy of the ACHCSA's February 28, 2001 letter is enclosed. Due to the presence of free product and the gasoline additive MTBE, the ACHCSA has requested that the claimant continue to monitor plume conditions by performing semi-annual groundwater sampling and analysis, and quarterly free product removal. These activities are to continue on a long-term basis.

Also enclosed is a copy of Subsurface Consultants, Inc.'s ("SCI") March 15, 2001 proposal to continue to perform groundwater monitoring and free product removal activities through December 2002. Because SCI has been responsible for managing the activities related to the UST release for several years now, there is sufficient justification for only obtaining a single bid for this work. I have also enclosed the California Underground Storage Tank Cleanup Fund Cost Pre-Approval Request form.

SCI estimates that the additional work will cost \$50,641. Pre-approving the costs for these services for a two-year period will streamline the project, making it less cumbersome for the claimant. As it is now, the claimant incurs costs in excess of those reimbursed by the Fund for the preparation of pre-approval requests and reimbursement packages. The claimant's consultant, SCI, has agreed to keep their costs in line with their proposal dated March 15, 2001.

Ms. Sofie Paredes  
March 26, 2001  
Page 2

WENDEL, ROSEN, BLACK & DEAN, LLP

We would like to obtain pre-approval prior to the next monitoring event, which is scheduled to take place this month and will work with you in whatever way is necessary to meet this goal. If you have any questions regarding this pre-approval request please do not hesitate to contact me or Ms. Jeriann Alexander of SCI at (925) 299-2960.

Very truly yours,

WENDEL, ROSEN, BLACK & DEAN, LLP



Greggory C. Brandt

GCB  
Enclosures

cc: Jonathan W. Redding (w/o enclosures)  
Jeriann Alexander (w/o enclosures)  
Don Strough (w/o enclosures)  
Don Hwang (w/ enclosures)

CALIFORNIA UNDERGROUND STORAGE TANK CLEANUP FUND  
COST PRE-APPROVAL REQUEST  
(Complete form, enclose required items, sign, date & return)

TO: Ms. Sofie Paredes Fax: (916) 227-4530

I. CLAIM INFORMATION

A. CLAIM NO. 9198 B. CLAIMANT Strough Family Trust of 1983

C. CLAIM STATUS (complete appropriate section)

- i) LOC ISSUED FOR \$ 75,000  
ii) ON PRIORITY LIST?  YES  NO IF YES, PRIORITY CLASS  A  B  C  D  
iii) NOT YET APPLIED TO THE FUND, EXPECTED APPLICATION DATE: \_\_\_\_\_

D. CONTACT PERSON: Greggory C. Brandt PHONE: (510) 834-6600  
ADDRESS: 1111 Broadway, 24th Floor FAX: (510) 834-1928  
Oakland, CA 94607

II. TYPE OF REQUEST (check appropriate boxes)

- PRE-APPROVAL \$ 50,641 AMOUNT REQUESTED  
 3-BID REVIEW \$ \_\_\_\_\_ PREFERRED BID (if applicable)

THE FOLLOWING DOCUMENTS ARE REQUIRED FOR THE SPECIFIED REQUEST. ALL DOCUMENTS REQUESTED MUST BE SUBMITTED OR THE REQUEST(S) WILL BE RETURNED UNPROCESSED.

- A. REQUEST FOR PRE-APPROVAL OF PROPOSED COSTS - The following items are required before review and determination will be made by Fund Staff.
- A complete signed copy of the proposed Investigation Workplan or Corrective Action Plan (CAP) (as defined and required by Article 11, Chapter 16, California Underground Storage Tank Regulations). Corrective Action Plans must include the required feasibility study and chosen cost effective alternative. Previously submitted and still applicable
  - A signed copy of the oversight agency approval letter for the Workplan/CAP. Previously submitted
  - A complete copy of the Request for Bids, including all attachments. A list of all firms requested to bid must be included. See ACHCSA's February 28, 2001 letter.
  - Complete copies of all bids and other correspondence submitted in response to the Request for Bids.
  - A time schedule, if not part of bid documents, anticipated for project initiation and duration.
  - A detailed project budget, which includes breakdowns of staff/task/hour with associated estimated totals.
- B. THREE-BID REVIEW/EVALUATION/DETERMINATION - Fund staff will assist any claimant requesting an evaluation of bids upon request. The following information must be submitted - 1,2,3 AND 4 as described in Item A above.

III. CERTIFICATION

I certify under penalty of perjury that all information submitted with this request is complete and accurate and in accordance with all applicable laws and regulations. Must be signed by claimant or person designated on the Authorized Representative Designation form

Jonathan W. Redding Jonathan Redding 3/22/01  
Signature Printed Name Date

IV. Authorization for the Fund to give out your name and phone number to other claimants in your region as a reference for consultants and contractors.  YES  NO

Jonathan W. Redding 3/27/01  
Signature Date



Subsurface Consultants, Inc.

March 15, 2001  
PW 01.172

Mr. Don Strough  
327 34<sup>th</sup> Street  
Oakland, California 94609

**Proposal**  
**Ongoing Monitoring/Free-Product Removal**  
327 34th Street  
Oakland, California

Dear Mr. Strough:

Subsurface Consultants, Inc. (SCI) is pleased to present this proposal to perform ongoing groundwater monitoring and free-product removal activities for the above-captioned site. Alameda County Health Care Services Agency (ACHCSA) approved SCI's recommendations for continued groundwater monitoring presented in our report, *Supplemental Site Characterization Investigation and Groundwater Monitoring Activities*, dated January 9, 2001. ACHCSA's comments were provided in a letter dated February 28, 2001 (attached).

The proposed scope of work and fee estimate are described herein. We have included costs for correspondence and meetings with the ACHCSA and Underground Storage Tank Cleanup Fund (Fund) reimbursement assistance during the course of the project. We plan to provide the proposed scope of services from March 2001 through the December 2002 quarterly free product removal event.

#### **PROPOSED SCOPE OF WORK**

SCI plans to perform the following tasks at the site over a 2-year period:

- Task 8 – Conduct Quarterly Free Product Removal, and Measure Groundwater Elevations,
- Task 9 – Semi-annual Groundwater Monitoring,
- Task 10 – Disposal of Generated Wastes,
- Task 11 – Regulatory Agency Correspondence and Meetings, and
- Task 12 – Project Management

These tasks are further described herien.

Mr. Don Strough  
 March 15, 2001  
 PW 01.172  
 Page 2

### Task 8 – Quarterly Water Level Measurements and Free-Product Removal

On a quarterly basis, SCI will measure water levels and check for the presence of free-product in site wells. Free-product detected in any of the wells will be removed by hand bailing, and will be decanted into a properly labeled 55-gallon drum and stored onsite for later disposal as described in Task 10.

SCI will tabulate the water level data and thickness of free-product measured in site wells, as well as the amount of product removed during each quarterly field visit. The quarterly data will be presented in Semi-annual Groundwater Monitoring Reports prepared as described in Task 9 below.

### Task 9 – Semi-annual Groundwater Monitoring and Reporting

SCI will collect and chemically analyze groundwater samples from all existing site wells on a semi-annual basis. These events will be conducted in the 1<sup>st</sup> and 3<sup>rd</sup> Quarters of 2001 and 2002. Wells that contain free product will not be sampled. Wells that do not contain free-product will be purged prior to sampling until measurements of pH, temperature, and conductivity stabilize. Purged groundwater will be stored onsite in labeled 55-gallon drums and disposed of as described in Task 10. Water samples will be retained in pre-cleaned containers supplied by the laboratory, and will be transported in chilled ice-chests to a state-certified analytical laboratory under chain-of-custody. The samples will be analyzed for the following chemicals:

<i>Analysis</i>	<i>Sample Preparation Method</i>	<i>Analysis Method</i>
Total Extractable Hydrocarbons (TEH) as diesel and motor oil, with silica gel cleanup	EPA 3550	EPA 8015 M
Total Volatile Hydrocarbons as gasoline (TVHg)	EPA 5030	EPA 8015M
Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX)	EPA 5030	EPA 8021
Methyl Tertiary Butyl Ether (MtBE)	EPA 5030	EPA 8260A
Nitrate (NO <sub>3</sub> ), Sulfate (SO <sub>4</sub> ), Manganese, Ferrous Iron (Fe III), Ammonia (NH <sub>3</sub> ), ortho-Phosphate (o-PO <sub>4</sub> ), and Carbon Dioxide (CO <sub>2</sub> )	Various Methods	Various Methods

To observe indications of biological degradation of the hydrocarbon plume, field and laboratory data will be collected and evaluated. SCI staff will use a multi-parameter meter to measure temperature, pH, conductivity, dissolved oxygen (DO), total dissolved solids (TDS), oxygen reduction potential (ORP), and specific conductivity. Laboratory geo-chemical parameters will

Mr. Don Strough  
March 15, 2001  
PW 01.172  
Page 3

include dissolved iron ( $Fe^{3+}$ ), manganese (Mn), sulfate ( $SO_4^{2-}$ ), nitrogen as ammonia ( $NH_3$ ) and as nitrate ( $NO_3^-$ ), and ortho-phosphate ( $o-PO_4^{3-}$ ).

SCI will prepare written semi-annual reports summarizing the results of the quarterly water level measurements and free-product removal, as well as the results of the semi-annual monitoring event. After the first semi-annual monitoring event, SCI will evaluate the effectiveness and usefulness of the laboratory bioparameters, and if appropriate will discuss with ACHCSA the reduction of the laboratory bioparameters from the monitoring program.

#### **Task 10 - Waste Disposal**

SCI will coordinate two events of waste disposal. The first event will include soil and water generated during previous site investigation and groundwater monitoring. Currently there are a total of 6, 55-gallon drums onsite: 4 contain soil and two contain water. SCI estimates that two years of additional groundwater sampling and free product removal will generate up to 8 drums of purge water. These materials will be stored onsite until the completion of the 4<sup>th</sup> Quarter 2002 event, and will then be disposed of.

SCI will coordinate the services of a State of California certified hazardous waste transportation and disposal company to dispose of the wastes offsite.

#### **Task 11 - Regulatory Agency Correspondence and Meetings**

SCI will correspond with ACHCSA staff throughout the project duration. We will attend meetings with the ACHCSA to discuss the case status and will continue to prepare and submit requests for reductions in the testing program based on the analytical data. We have estimated that one meeting will be required during each year of monitoring.

#### **Task 12 - Project Management**

SCI will continue to provide project management activities. In the past, our services have included discussions and meetings with representatives of the Trust on regulatory oversight and site management issues pertaining to the groundwater plume.

#### **FEE ESTIMATE**

SCI will perform the services described herein on a time-and-expense basis in accordance with the attached Service Agreement, Schedule of Charges, and Terms and Conditions. Our estimated fee for services performed under Tasks 8, 9, 10, 11 and 12 for a two-year period ending December 2002 is \$50,641. A breakdown of our estimate is presented in Table 1.

Mr. Don Strough  
March 15, 2001  
PW 01.172  
Page 4

SCI is ready to conduct the first groundwater monitoring event after receiving your written authorization to proceed.

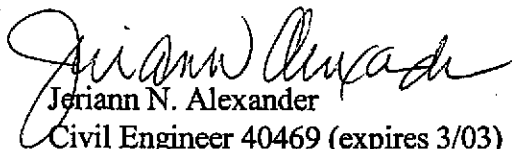
SCI appreciates the opportunity to present this proposal and would be pleased to discuss it with you. If you have any questions, please call either of the undersigned.

Very truly yours,

Subsurface Consultants, Inc.



Emily Silverman  
Staff Geologist



Jeriann N. Alexander  
Civil Engineer 40469 (expires 3/03)  
Registered Environmental Assessor 03130 (expires 7/01)

ES:JNA:ae PW01.172\Proposal\_2\_01

2 copies submitted

Attachments: ACHCSA letter, dated February 28, 2001

Table 1- Fee Estimate  
Service Agreement  
Schedule of Charges  
Terms and Conditions

cc: Mr. Jonathan Redding  
Wendel, Rosen, Black & Dean, LLP.  
1111 Broadway, 24<sup>th</sup> Floor  
Oakland, CA 94607-4036



**FEE ESTIMATE  
GROUNDWATER MONITORING  
327 34TH STREET  
OAKLAND, CALIFORNIA  
MARCH 2001**

**TASK 8- FREE PRODUCT REMOVAL AND GROUNDWATER ELEVATION MEASUREMENTS**

Associate Engineer	1 hour @	\$135 /hour	\$135
Staff Engineer	8 hours @	\$88 /hour	\$704
Vehicle	8 hours @	\$12 /hour	\$96
Tools/Equipment Usage	1 fee @	\$200 /fee	\$200
<b>Task 6 Subtotal</b>			<b>\$1,135</b>
<b>Task 8 Subtotal One Year (4 Events)</b>			<b>\$4,540</b>
<b>Task 8 Subtotal Two Years (8 Events)</b>			<b>\$9,080</b>

**TASK 9- SEMI ANNUAL GROUNDWATER MONITORING*****FIELD ACTIVITIES***

Associate Engineer	2 hours @	\$135 /hour	\$270
Staff Engineer	8 hours @	\$88 /hour	\$704
Vehicle	8 hours @	\$12 /hour	\$96
Field Instrument Rental	2 day @	\$210 /day	\$420
Drum/Materials	1 fee @	\$200 /fee	\$200
<b>Subtotal</b>			<b>\$1,690</b>

***ANALYTICAL TESTING PROGRAM***

Associate Engineer	1 hour @	\$135 /hour	\$135
Staff Engineer	2 hours @	\$88 /hour	\$176
Total Extractable Hydrocarbons (TEH) as Diesel and motor oil, EPA 8015M with silica gel cleanup	7 tests @	\$98 /test	\$684
Total Volatile Hydrocarbons (TVH) as Gasoline and BTEX, EPA 8015M/8020	7 tests @	\$63 /test	\$443
MTBE, EPA 8260	7 tests @	\$115 /test	\$805
Nitrate, Ferrous Iron, Manganese, Sulfate	7 tests @	\$374 /test	\$2,616
Ammonia, ortho-Phosphate, Carbon Dioxide	7 tests @	\$85 /test	\$595
<b>Subtotal</b>			<b>\$5,454</b>

***REPORT PREPARATION AND CONSULTATION REGARDING MONITORING***

Associate Engineer	4 hours @	\$135 /hour	\$540
Staff Engineer	10 hours @	\$88 /hour	\$880
Clerical	2 hours @	\$55 /hour	\$110
Drafting	3 hours @	\$75 /hour	\$225
<b>Subtotal</b>			<b>\$1,755</b>

<b>Task Subtotal</b>	<b>\$8,899</b>
<b>Task 9 Subtotal One Year (2 Events)</b>	<b>\$17,799</b>
<b>Task 9 Subtotal Two Years (4 Events)</b>	<b>\$35,597</b>

**FEE ESTIMATE  
GROUNDWATER MONITORING  
327 34TH STREET  
OAKLAND, CALIFORNIA  
MARCH 2001**

**TASK 10 - DISPOSAL OF DRUMMED WASTES (TWO EVENTS)**

*PREVIOUS INVESTIGATION ACTIVITIES - 6 DRUMS: 4 SOIL AND 2 WATER*

Associate Engineer	1 hour @	\$135 /hour	\$135
Staff Engineer	4 hours @	\$88 /hour	\$352
Purge Water Disposal (non-hazardous)	6 drums @	\$135 /drum	\$810
	<b>Subtotal</b>		<b>\$1,297</b>

*FUTURE GROUNDWATER MONITORING ACTIVITIES - 8 WATER DRUMS*

Associate Engineer	1 hour @	\$135 /hour	\$135
Staff Engineer	4 hours @	\$88 /hour	\$352
Analytical Testing	1 fee @	\$260 /fee	\$260
Purge Water Disposal (non-hazardous)	8 drums @	\$135 /drum	\$1,080
	<b>Subtotal</b>		<b>\$1,827</b>
	<b>Task 10 Total</b>		<b>\$3,124</b>

**TASK 11- REGULATORY AGENCY CORRESPONDENCE AND MEETINGS (2 Year Period)**

Associate Engineer	4 hours @	\$135 /hour	\$540
Staff Engineer	10 hours @	\$88 /hour	\$880
	<b>Task 11 Total</b>		<b>\$1,420</b>

**TASK 12 - PROJECT MANANAGEMENT (2 Year Period)**

Associate Engineer	4 hours @	\$135 /hour	\$540
Staff Engineer	10 hours @	\$88 /hour	\$880
	<b>Task 12 Total</b>		<b>\$1,420</b>

<b>Fee Estimate</b>	<b>\$50,641</b>
---------------------	-----------------

**SERVICE AGREEMENT**

This Agreement is made this 15<sup>th</sup> day of March, 2001, between Strough, Family Trust of 1983, subsequently referred to as "Client," and Subsurface Consultants, Inc. (SCI) subsequently referred to as "Consultant."

By joining in this Agreement, Client retains Consultant to perform Groundwater Monitoring/Free-Product Removal located at 327 34th Street in Oakland, California, subsequently referred to as "Project". The Client's relationship to Project is that of owner.

**Scope of Services**

By this Agreement, the scope of Consultant's services on Project is limited to the Tasks discussed in Consultants proposal dated March 15, 2001.

**Fee**

Consultant agrees to provide services covered by this Agreement on a time-and-expense basis, in accordance with the attached Schedule of Charges and Terms and Conditions, which are incorporated into and made a part of this Service Agreement. On this basis, Consultant estimates its fee for the services outlined for Tasks 9, 10, 11, and 12 will be \$50,641. Consultant will not exceed this fee without Client's authorization.

If Project requirements or subsurface conditions encountered indicate that the Scope of Services covered by this Agreement should be revised, an additional Service Agreement or written addendum to this Agreement shall be entered into to cover the revised scope and fee. Should Client authorize a revision in the scope of services without a revision to this Agreement, Consultant shall be compensated for services actually performed.

If a dispute arises relating to the performance of services covered by this Agreement, and legal or other costs are incurred, it is agreed that the prevailing party shall be entitled to recover all reasonable costs incurred in resolving the claim, including employee-related costs at current billing rates, attorney's fees and other claim-related expenses.

**Authorized by:**

*Juanita Alvarez*  
\_\_\_\_\_  
Title: *Associate Engineer*  
\_\_\_\_\_

Date: *3/15/01*  
\_\_\_\_\_  
Consultant

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Client

### 1. SCOPE OF SERVICES

The CLIENT agrees to employ and does hereby employ CONSULTANT to perform the professional services specified in this Agreement, with the term of such employment to commence on the date of execution of this Agreement and to continue until completion of the work provided for herein or termination as described in Article 9. The CONSULTANT agrees to furnish the necessary personnel, incidental services, equipment, and facilities to perform the Scope of Work stated in this Agreement or attached thereto.

Services and work product not expressly included with those specified in this Agreement, as determined by CONSULTANT, are not covered by this Agreement. Additional services or work products resulting in an adjustment of CONSULTANT'S originally estimated fee will be provided at Client's request upon execution by both parties of a written amendment to this Agreement.

### 2. COMPENSATION

The CLIENT agrees to pay CONSULTANT'S invoices for the services specified in this Agreement in accordance with the attached Schedule of Charges, and such payment shall be considered as full compensation for all personnel, materials, supplies, and equipment used in performing the work. Rates are subject to an annual increase to reflect merit and economic adjustments.

CLIENT will be invoiced at the end of each billing period. Payment in full of an invoice must be received by CONSULTANT within thirty (30) days of the date of such invoice. Failure of CLIENT to make full payment of an invoice so that it is received by CONSULTANT within said thirty (30) days of invoice date subjects the amount overdue to a delinquent account interest rate of one and one half percent (1½%) per month, compounded monthly, beginning thirty (30) days after invoice date and until full payment is received. Failure of CLIENT to submit full payment of an invoice within thirty (30) days of the date thereof subjects this Agreement and the work herein contemplated to suspension or termination at CONSULTANT'S discretion.

CONSULTANT, without any liability to CLIENT, reserves the right to withhold any services and work products pending payment of CLIENTS outstanding indebtedness. For services provided on a reimbursable basis, budget may be increased by amendment to complete the Scope of Work, and CONSULTANT is not obligated to provide services in excess of authorized budget.

The work performed by CONSULTANT shall be deemed approved and accepted by CLIENT as and when invoiced unless CLIENT objects within fifteen (15) days of invoice date by written notice specifically stating the details in which CLIENT believes such work is incomplete or defective, and the invoice amount(s) in dispute. CLIENT shall pay undisputed amounts as specified herein.

### 3. INSURANCE

CONSULTANT, at its own expense, will maintain in force the following policies of insurance during the period of performance of this Agreement:

- (a) Workers Compensation and Employer's Liability Insurance at statutory limits,
- (b) Commercial General Liability Insurance with a combined single limit of \$1,000,000 per occurrence and \$1,000,000 aggregate for bodily injury, including death, and property damage, and
- (c) Automobile Liability Insurance with a combined single limit for bodily injury and property damage of \$1,000,000 per occurrence.

If requested by CLIENT, CONSULTANT will furnish CLIENT with satisfactory evidence of the above insurance with a provision that at least thirty (30) days prior written notice will be given to the CLIENT in the event of cancellation of insurance coverage.

**4. EXISTING CONDITIONS (HAZARDOUS MATERIALS AND UNDERGROUND UTILITIES)**

CLIENT shall furnish, or cause to be furnished to CONSULTANT, all documents and information known to CLIENT that relate to the identity, location, quantity, nature, or characteristics of any asbestos, PCBs, or any other hazardous materials or waste at, on, or under the site. In addition, CLIENT will furnish or cause to be furnished such reports, data, studies, plans, specifications, documents, and other information of surface or subsurface site conditions, e.g., underground tanks, pipelines and buried utilities, required by CONSULTANT for proper performance of its services. CONSULTANT shall be entitled to rely upon CLIENT-provided documents and information in performing the services required in this Agreement; however, CONSULTANT assumes no responsibility or liability for their accuracy or completeness nor for any damages to underground improvements not accurately and completely identified prior to the beginning of the work. CLIENT-provided documents will remain the property of the CLIENT.

CLIENT acknowledges that CONSULTANT and its subcontractors have played no part in the creation of any hazardous waste, pollution sources, nuisance, or chemical or industrial disposal problem, which may exist, and that CONSULTANT has been retained for the sole purpose of assisting the CLIENT in assessing any problem which may exist and in assisting the CLIENT formulating a remedial program, if such is within the Scope of Work which CONSULTANT has assumed. It is recognized and agreed that CONSULTANT has assumed responsibility only for making the investigations, reports, and recommendations to the CLIENT included within the Scope of Work. The responsibility for making any disclosures or reports to any third party and for the taking of corrective, remedial, or mitigative action shall be solely that of the CLIENT.

**5. STANDARD OF CARE**

CONSULTANT agrees that, in connection with its services performed under this Agreement, such services are performed with the care and skill ordinarily exercised by members of the profession practicing under similar conditions at the same time and in the same or a similar locality. CLIENT recognizes that the state of practice, particularly with respect to hazardous waste conditions, is changing and evolving. While CONSULTANT will perform in reasonable accordance with standards in effect at the time its services are performed, it is recognized that such standards may subsequently change because of improvements in the state of practice. When the findings and recommendations of CONSULTANT are based on information supplied by CLIENT and others, CONSULTANT shall have the right to rely on the accuracy and completeness of such information. No warranty or guarantee, express or implied, is made or intended by providing of consulting services or by furnishing oral or written reports of the findings made.

**6. LIMITATION ON LIABILITY**

CONSULTANT'S liability to CLIENT, CLIENT'S contractors, subcontractors, agents, employees and consultants, and to all other third parties, which may arise from or be due directly or indirectly to the negligent acts, errors and/or omissions of CONSULTANT, its agents, employees or consultants shall not exceed \$50,000 and shall be limited to direct damages. All other damages such as loss of use, profits, anticipated profits, and like losses are consequential damages for which CONSULTANT is not liable. CLIENT shall give written notice to CONSULTANT of any claim of negligent act, error or omission within one (1) year after the completion of the work performed by CONSULTANT. Failure to give notice within the required period shall constitute waiver of said claim by CLIENT.

**7. INDEMNITY**

CLIENT understands that in seeking the professional services of CONSULTANT, CLIENT may be requesting CONSULTANT to undertake uninsurable obligations for CLIENT'S benefit involving the presence or potential presence of hazardous, toxic, or pollutant substances. Therefore, CLIENT agrees to defend, indemnify, and hold harmless CONSULTANT from damages from any cause whatsoever, excepting the willful misconduct or sole negligence of CONSULTANT in the performance of services under this Agreement, as a result of or in connection with the presence (or failure to detect the presence), discharge, release, or escape of toxic or hazardous materials or contaminants of any kind, and from any and all claims for damages claimed by other parties to the extent they exceed the limitation contained in Article 6 above.

**8. COST ESTIMATES**

Any statements of estimated cost furnished by CONSULTANT are predicted costs and are based on professional opinions and judgment. CONSULTANT cannot be held responsible for fluctuations in construction costs due to bidding conditions and other factors which could not be anticipated at the time of preparation of the particular estimate.

**9. TERMINATION OF AGREEMENT****(a) DUE TO DEFAULT**

This agreement may be terminated by either party upon seven (7) days written notice should the other party fail substantially to perform in accordance with this Agreement through no fault of the party initiating the termination.

**(b) WITHOUT CAUSE**

This agreement may be terminated by CLIENT upon at least fourteen (14) days written notice to CONSULTANT in the event the project is abandoned.

**(c) TERMINATION ADJUSTMENT PAYMENT**

If this agreement is terminated through no fault of the CONSULTANT, CONSULTANT shall be paid for services performed and costs incurred to the termination notice date, including Reimbursable Expenses due, plus an additional amount, not to exceed ten percent (10%) of charges incurred to the termination notice date, to cover expenses incurred by CONSULTANT including but not limited to cancellation fees or charges. CONSULTANT will use reasonable efforts to minimize such additional charges.

**10. GENERAL PROVISIONS****(a) APPLICABLE LAW**

This Agreement shall be interpreted and enforced according to the laws of the State of California, unless agreed otherwise.

**(b) PRECEDENCE OF CONDITIONS**

Should any conflict exist between the terms herein and the form of any purchase order or confirmation issued, the terms of Conditions herein shall prevail in the absence of CONSULTANT'S express written agreement.

**(c) ASSIGNMENT OR SUBCONTRACTING**

Neither CLIENT nor CONSULTANT shall assign its interest in this agreement without the written consent of the other. CONSULTANT may subcontract any portion of the work to be performed hereunder without such consent.

**(d) OWNERSHIP OF DOCUMENTS**

All plans, specifications, tracings, survey notes, computer programs, and other original documents are instruments of CONSULTANT'S service and shall not be used on other projects without CONSULTANT'S prior written consent; however, if used on other projects, such use shall be at CLIENT'S sole risk. No documents may be altered or modified except by CONSULTANT. The CONSULTANT shall be deemed the author of these documents and shall retain all common law, statutory and other reserved rights, including the copyright. The CLIENT may retain copies, including reproducible copies, of these documents for information and reference in connection with the CLIENT'S use for this project. Submission or distribution of these documents to meet official regulatory requirements or for similar purposes in connection with this project are not to be construed as publication in derogation of the CONSULTANT'S reserved rights.

**(e) FORCE MAJEURE**

Any delay or default in the performance of any obligation of CONSULTANT under this agreement resulting from any cause(s) beyond CONSULTANT'S reasonable control, shall not be deemed a breach of this Agreement. The occurrence of any such event shall suspend the obligations of CONSULTANT as long as performance is delayed or prevented thereby, and the fees due hereunder shall be equitably adjusted.

**(f) ATTORNEY'S FEES**

Should either party hereto bring suit in court to enforce any term of this Agreement, it is agreed that the prevailing party shall be entitled to recover its costs, expenses, and reasonable attorney's fees.

**(g) MERGER: WAIVER: SURVIVAL**

Except for amendments as set forth in Article I above, this Agreement constitutes the entire and integrated agreement between the parties hereto and supersedes all prior negotiations, representations, and/or agreements, written or oral. One or more waiver of any term, condition or other provision of this agreement by either party shall not be construed as a waiver of a subsequent breach of the same or any other provision. Any provision hereof which is legally deemed void or unenforceable shall not void this entire Agreement, and all remaining provisions shall survive and be enforceable.

**(h) SERVICES BY CLIENT**

CLIENT will provide access to site of work, obtain all permits, provide all legal services in connection with the project, and provide environmental reports or any other reports or filings required of the site owner, unless specifically included in the CONSULTANT'S scope of work. CLIENT shall pay the costs of checking and inspection fees, zoning application fees, testing fees, surveying fees, permits, bond premiums, and all other charges not specifically covered by the terms of this Agreement.

**SCHEDULE OF CHARGES**

**Professional Services for Engineers,**

**Geologists, and Environmental Scientists**

	<b>Hourly Rates</b>
Principal	\$145 to \$170
Associate	\$130 to \$145
Senior	\$115 to \$130
Project	\$92 to \$115
Staff	\$70 to \$92

**Expert Witness & Deposition Testimony**

1.5 times hourly rates  
Minimum 4 Hours Per Day In-State/  
8 Hours Per Day Out-of-State

**Technical Services**

Field Technician	\$60 to \$75
Senior Field Technician	\$75 to \$90
Field Geologist	\$75 to \$90
Field Overtime Rate	1.20 times hourly rates
CADD Operator	\$75
Word Processor Operator/Clerical	\$40 to \$60

**Other Services/Charges**

Outside Services & Equipment	Cost + 15%
Communication	Project Labor Charges x 3%
Computer	\$10/hour
SCI Vehicle & Field Equipment	\$12/hour
Specialized Equipment	Per Day Rental

**Fees for Services**

Fees for services will be based on the time worked on the project by staff personnel plus reimbursable expenses. Labor related fees will be computed based on the hourly billing rates in effect at the time the services are performed. Personnel billing rates are subject to revision on January 1 and July 1 of each year.

**Travel Time**

Travel time will be charged at regular hourly rates, for actual time involved.

**Outside Services**

Outside services include all services and/or equipment not ordinarily provided by Subsurface Consultants, Inc., such as drilling equipment rental, laborers, special printing, subsistence and lodging, travel by common carrier, etc.

**Communication Charge**

In-house costs for long distance telephone, cellular telephone, fax, printing and standard postage.

**Terms**

Billings are payable upon receipt unless other arrangements, confirmed in writing by Subsurface Consultants, Inc., have been made. A finance charge of 1-1/2 percent per month will be payable on accounts not paid within 30 days. Any attorney's fees or other costs incurred collecting any delinquent amount shall be paid by the Client.

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

February 28, 2001

Don Strough  
Strough Family Trust of 1983  
PO Box 489  
Orinda, CA 94563

Dear Mr. Strough:

Subject: Val Strough Chevrolet, 327-34<sup>th</sup> St., Oakland, CA 94609;  
Stfd 3035

"Supplemental Site Characterization Investigation and Groundwater Monitoring Activities -- March to October 2000" by Subsurface Consultants, Inc., dated January 9, 2001, was reviewed. The most recent groundwater samples collected on July 20, 2000 again found free product in MW-2 as well as analytes at concentrations of concern in MW-3 and in MW-4. MW-3 contained Total Petroleum Hydrocarbons-Gasoline (TPH-G), TPH-Diesel (TPH-D), TPH-Motor Oil (TPH-M), Benzene, Toluene, Ethylbenzene, Xylenes (BTEX), and Methyl Tertiary-Butyl Ether (MTBE) at 69,000 ug/l, 2,900 ug/l, <300 ug/l, 5,700 ug/l, 14,000 ug/l, 1,600 ug/l, 9,300 ug/l, and 3,300 ug/l, respectively. Benzene and MTBE concentrations were of significance in MW-4. The concentrations were 91 ug/l and 1,500 ug/l, respectively. The MTBE concentration in MW-6 was 160 ug/l.

Collect another round of groundwater samples after which the monitoring frequency will be evaluated. Continue to monitor for free product in wells and if found, remove.

If you have any questions, you may contact me at (510) 567-6746.

Sincerely,

Don Hwang  
Hazardous Materials Specialist

C: Gene Ng, Jeriann Alexander, Subsurface Consultants, Inc., 3736 Mt. Diablo Blvd.,  
Suite 200, Lafayette, CA 94549-3659

✓ File



# State Water Resources Control Board



Gray Davis  
Governor

## Division of Clean Water Programs

2014 T Street • Sacramento, California 95814 • (916) 227-7883

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

Winston H. Hild  
Secretary for  
Environmental  
Protection

MAY 16 PM 4: 23

May 12, 2000

Mr. Don Strough  
Strough Family Trust of 1983  
P.O. Box 489  
Orinda, CA 94563

### **PRE-APPROVAL OF CORRECTIVE ACTION COSTS, CLAIM NO. 9198, SITE ADDRESS: 327 34<sup>TH</sup> STREET, OAKLAND**

I have reviewed your request, received on May 9, 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 monitoring well installation and related work, is **\$11,495.00**. The cost proposal for this work by Subsurface Consultants is approved for the amount shown above (please see attached budget tracking form for details).

*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 Subsurface Consultants 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.

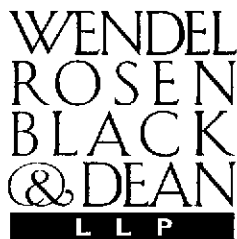
Sincerely,



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

cc: Mr. Don Hwang, Alameda County Health Care Services, Alameda





Attorneys at Law

ENVIRONMENTAL  
PROTECTION

00 MAY -9 AM 10:13

1111 Broadway, 24th Floor  
Oakland, CA 94607-4036

Post Office Box 2047  
Oakland, CA 94604-2047

Telephone: (510) 834-6600  
Fax: (510) 834-1928  
info@wendel.com

May 5, 2000

Ms. Sofie Paredes  
Underground Storage Tank Fund Program  
State Water Resources Control Board, Division of Clean Water  
2014 T. Street, Suite 130  
P.O. Box 944212  
Sacramento, CA 94244-2120

**Re: UST Cleanup Fund Claim Number 9198  
Preapproval Request for Additional Site Investigation  
327 34th Street, Oakland, California**

Dear Ms. Paredes:

This letter is to submit the necessary documentation for preapproval of additional investigation and monitoring costs, as required by the Alameda County Health Care Services Agency ("ACHCSA") in their November 8, 1999 letter, at the above-mentioned site. A copy of the ACHCSA's November 8, 1999 letter is enclosed.

The ACHCSA has requested that the claimant perform additional monitoring at this site to determine the likelihood of an onsite underground culvert acting as a conduit for contaminant plume migration. This will require research regarding the presence of a buried culvert beneath the site and, once the culvert is located, the installation of two additional monitoring wells to evaluate the downgradient extent of the plume. The ACHCSA has further required additional bioparameter analytical testing to be conducted concurrently with the Fund preapproved groundwater monitoring program (see the ACHCSA's March 8, 2000 letter, a copy of which is enclosed herewith.)

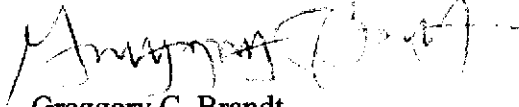
Also enclosed is a copy of Subsurface Consultants, Inc.'s ("SCI") May 3, 2000 proposal and SCI's March 30, 2000 letter reiterating that the local agency has required this work and clarifying the bioparameter analysis that will be conducted. Because SCI has been responsible for ongoing monitoring and related work at this site there is sufficient justification for only obtaining a single bid for this work. I have also enclosed the California Underground Storage Tank Cleanup Fund Cost Pre-Approval Request form.

SCI estimates that the additional work will cost \$12,455. Preapproving the costs for these services will streamline the project, making it less cumbersome for the claimant. As it is now, the claimant incurs costs in excess of those reimbursed by the Fund for the preparation of preapproval requests and reimbursement packages. The claimant's consultant, SCI, has agreed to keep their costs in line with their proposal dated May 3, 2000.

The claimant would like to perform this additional work in conjunction with the next semi-annual groundwater monitoring event, which is scheduled for June 2000. We would like to obtain preapproval prior to this upcoming monitoring event and will work with you in whatever way is necessary to meet this goal. If you have any questions regarding this preapproval request please do not hesitate to contact me or Ms. Jeriann Alexander of SCI at (925) 299-2960.

Very truly yours,

WENDEL, ROSEN, BLACK & DEAN, LLP



Greggory C. Brandt

GCB:oim  
Enclosures

cc: Jonathan Redding  
Jeriann Alexander, SCI (w/ encl.)  
Don Strough (w/ encl.)  
Don Hwang, ACHCSA (w/ encl.)

CALIFORNIA UNDERGROUND STORAGE TANK CLEANUP FUND  
COST PRE-APPROVAL REQUEST  
(Complete form, enclose required items, sign, date & return)

TO: Ms. Sofie Paredes Fax: (916) 227-4530

I. CLAIM INFORMATION

A. CLAIM NO. 9198 B. CLAIMANT Strough Family Trust of 1983

C. CLAIM STATUS (complete appropriate section)

i) LOC ISSUED FOR \$ 75,000

ii) ON PRIORITY LIST?  YES  NO IF YES, PRIORITY CLASS  A  B  C  D

iii) NOT YET APPLIED TO THE FUND, EXPECTED APPLICATION DATE: \_\_\_\_\_

D. CONTACT PERSON: Greggory C. Brandt PHONE: (510) 834-6600  
ADDRESS: 1111 Broadway, 24th Floor FAX: (510) 834-1928  
Oakland, CA 94607

II. TYPE OF REQUEST (check appropriate boxes)

PRE-APPROVAL \$ 12,455 AMOUNT REQUESTED

3-BID REVIEW \$ \_\_\_\_\_ PREFERRED BID (if applicable)

THE FOLLOWING DOCUMENTS ARE REQUIRED FOR THE SPECIFIED REQUEST. ALL DOCUMENTS REQUESTED MUST BE SUBMITTED OR THE REQUEST(S) WILL BE RETURNED UNPROCESSED.

A. REQUEST FOR PRE-APPROVAL OF PROPOSED COSTS-The following items are required before review and determination will be made by Fund Staff.

- A complete signed copy of the proposed Investigation Workplan or Corrective Action Plan (CAP) (as defined and required by Article 11, Chapter 16, California Underground Storage Tank Regulations). Corrective Action Plans must include the required feasibility study and chosen cost effective alternative.
- A signed copy of the oversight agency approval letter for the Workplan/CAP.
- A complete copy of the Request for Bids, including all attachments. A list of all firms requested to bid must be included.
- Complete copies of all bids and other correspondence submitted in response to the Request for Bids.
- A time schedule, if not part of bid documents, anticipated for project initiation and duration.
- A detailed project budget, which includes breakdowns of staff/task/hour with associated estimated totals.

B. THREE-BID REVIEW/EVALUATION/DETERMINATION - Fund staff will assist any claimant requesting an evaluation of bids upon request. The following information must be submitted - 1, 2, 3 AND 4 as described in Item: A above.

III. CERTIFICATION

I certify under penalty of perjury that all information submitted with this request is complete and accurate and in accordance with all applicable laws and regulations. Must be signed by claimant or person designated on the Authorized Representative Designation form

Jonathan W. Redding Jonathan Redding 5/5/00  
Signature Printed Name Date

IV. Authorization for the Fund to give out your name and phone number to other claimants in your region as a reference for consultants and contractors  YES  NO

Jonathan W. Redding 5/5/00  
Signature Date



Subsurface Consultants, Inc.

May 3, 2000  
SCI 1039.008

Strough Family Trust of 1983  
c/o Mr. Don Strough  
2 Sea View Avenue  
Piedmont, California 94611

**Proposal**  
**Additional Site Characterization and Modifications to**  
**Existing Groundwater Monitoring Program**  
**327 34th Street**  
**Oakland, California**

Dear Mr. Strough:

Subsurface Consultants, Inc. (SCI) is pleased to present this proposal to perform an additional site characterization study for the above-captioned site. The Alameda County Health Care Services Agency (ACHCSA) stated in their letter dated November 8, 1999 that additional characterization was required in order to determine the likelihood of an onsite underground culvert acting as a conduit for contaminant plume migration. The scope of the additional work was outlined in our groundwater monitoring report dated February 7, 2000, and approved by the ACHCSA in their letter dated March 8, 2000.

This proposal also addresses modifications to the existing groundwater monitoring program, as requested by the ACHCSA in their March 8 letter. The proposed scope of work and fee estimate for both the additional investigation and monitoring program modifications are described herein.

**PROPOSED SCOPE OF WORK FOR ADDITIONAL SITE CHARACTERIZATION**

SCI plans to perform the following tasks as part of the additional site characterization:

- Task 6 – Conduct research and field mapping of onsite underground culvert
- Task 7 – Install and monitor two additional downgradient wells

These tasks are further described in the following sections:

Strough Family Trust of 1983  
c/o Mr. Don Strough  
May 3, 2000  
SCI 1039.008  
Page 2

#### **Task 6 - Conduct Research and Field Mapping of Onsite Underground Culvert**

SCI will conduct research regarding the presence of a buried culvert beneath the eastern half of the site. The research will include contacting the City of Oakland (City) Public Works Department regarding culvert construction details. In addition, SCI will contact Underground Service Alert to notify the City to initially mark the location of the culvert as it crosses below 34<sup>th</sup> Street.

SCI will also conduct a site visit to confirm the location of manholes and drop inlets associated with the buried culvert as shown on historic maps. The location of the manholes and drop inlets will be measured relative to the existing buildings, and the field investigation Site Plan will be modified as necessary to show the location of the culvert. The depth to the flow line of the culvert will be measured and compared to the change in groundwater depths across the Site. The comparison of the flow line depth and groundwater elevation data will be used to evaluate whether there is more likely to be exfiltration from the culvert or infiltration into the culvert.

#### **Task 7 - Install and Monitor Two Additional Downgradient Wells**

Once the culvert is located, two new monitoring wells will be installed to evaluate the downgradient extent of the plume. Actual locations of the wells will be dependent on the layout and usage of the dealer lot; locations that result in the least amount of disturbance will be selected. Prior to well installation, permits will be obtained from Alameda County Zone 7.

The wells will be constructed to a depth of 35 feet inside of 8-inch diameter borings drilled with hollow-stem auger equipment. The wells will be comprised of 20 feet of 2-inch-diameter machine-slotted (0.020-inch), threaded to an upper 15 feet of 2-inch-diameter blank Schedule 40 PVC casing. The annular space between the casing and the borings will be backfilled with No. 3 type sand to approximately 1.5 feet above the top of the well screen. A 1-foot layer of bentonite pellets will be placed on top of the sand pack, and the remainder of the annular space will be backfilled with cement. The top of the wells will be secured with a water tight locking cap, and housed within a flush-mounted traffic-rated well box. A minimum of 72 hours after installation, the wells will be developed by removal of at least three casing volumes of water until pH, temperature and conductivity levels equilibrate. The wells will then be monitored in accordance with the approved monitoring program.

The top of the well casings will be surveyed in relation to the existing wells, using well MW-1 as a reference datum with an assumed elevation of 100 feet. Soil cuttings and well development water will be placed in drums and temporarily stored onsite pending review of the analytical data. SCI will coordinate drum disposal. For estimating purposes, SCI has assumed that the soil can be disposed of as non-hazardous waste and that the water will be recycled.

Strough Family Trust of 1983  
c/o Mr. Don Strough  
May 3, 2000  
SCI 1039.008  
Page 3

SCI will document the installation of the wells in one of the periodic groundwater monitoring reports. The report will include well completion logs and the modified Site Plan showing well locations and the location of the onsite underground culvert.

### **PROPOSED MODIFICATIONS TO EXISTING MONITORING PROGRAM**

The current monitoring program (Task 2) includes the analyses of groundwater samples for total extractable hydrocarbons as diesel and motor oil (TEHd and TEHo), total volatile hydrocarbons as gasoline (TVHg), benzene, toluene, ethylbenzene, and xylenes (BTEX), and methyl tertiary butyl ether (MTBE). The monitoring program will be modified to (1) accommodate the sampling and chemical analyses of groundwater from the two new monitoring wells, and (2) include the sampling and analyses of groundwater from all wells for the following bio-parameters: carbon dioxide (CO<sub>2</sub>), ferrous iron (Fe<sup>2+</sup>), manganese (Mn), sulfate (SO<sub>4</sub><sup>2-</sup>), nitrogen as ammonia (N-NH<sub>3</sub>) and as nitrate (N-NO<sub>3</sub>), and ortho-phosphate (o-PO<sub>4</sub><sup>3-</sup>). The purpose of these bio-parameter analyses, along with field measurements of dissolved oxygen (DO) and pH, is to assess the stability and natural attenuation potential of the hydrocarbon plume. In our proposal dated November 10, 1999, it was assumed that these bio-parameters could be analyzed utilizing the multi-parameter meter used in the field for measuring DO and pH, and this is not the case. Samples from all the wells will be submitted to a laboratory for analyses of the previously mentioned petroleum hydrocarbon constituents and these additional bio-parameters.

### **FEE ESTIMATE**

SCI will perform the services described herein on a time-and-expense basis in accordance with the current Service Agreement, and the attached Change Order No. 1 form. Our estimated fee for the new Tasks 6 and 7 is \$9,550. Our estimated fee for the groundwater monitoring program modifications (Task 2) is \$2,905 for one semi-annual event. A breakdown of our estimate is presented in Tables 1 and 2.

SCI is ready to implement this scope of work concurrent with the next semi-annual event scheduled for June 2000. We anticipate that the site activities will be conducted after receiving your authorization to proceed. Please return a signed copy of the attached Change Order No. 1 form for our file.



Strough Family Trust of 1983  
c/o Mr. Don Strough  
May 3, 2000  
SCI 1039.008  
Page 4

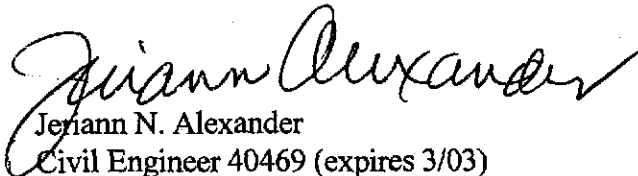
SCI appreciates the opportunity to present this proposal and would be pleased to discuss it with you. If you have any questions, please call the undersigned.

Very truly yours,

Subsurface Consultants, Inc.



Gene Y. Ng  
Staff Engineer



Jeriann N. Alexander  
Civil Engineer 40469 (expires 3/03)  
Registered Environmental Assessor 03130 (expires 6/00)

GYN:JNA:rm 1039.008\Proposal\_Additional\_Work.doc

2 copies submitted

Attachments:      Table 1- Fee Estimate: Additional Site Characterization  
                         Table 2- Fee Estimate: Modifications to Existing Monitoring Program  
                         Change Order No. 1

cc:      Mr. Gregory Brandt  
            Wendel, Rosen, Black & Dean, LLP.  
            1111 Broadway, 24<sup>th</sup> Floor  
            Oakland, CA 94607-4036

Table 2. Fee Estimate  
 Modifications to Existing Monitoring Program  
 327 34th Street, Oakland  
 Summer 2000: Semi-Annual Event

	SCI LABOR								EXPENSES/SUBCONTRACTORS				ESTIMATED COSTS	
	ESTIMATED SCI LABOR (Hours)								UNIT	QUANT	COST	15% Mark-up?	TOTAL COST PER ITEM	SUB TOTALS
	SCI Personnel & Rates (\$/hr)													
	CLER	WPO	DRFT	TECH	GEO.	ENGR.	ASSOC	PRIN						
	35	35	40	60	75	80	120	140			(\$/unit)	(1 = Yes)	(\$)	(\$)
<b>SAMPLING AND ANALYSES FOR TWO NEW MONITORING WELLS</b>														
<u>Engineering and Field Costs</u>														
SCI Labor														
			4			2							\$400	\$400
<u>Analytical laboratory</u>														
TVH/BTEX (EPA 8015 mod.)														
									test	2	\$55	1	\$127	
MIBE (EPA 8260)														
									test	2	\$75	1	\$173	
TEH (EPA 8015 Mod.)														
									test	2	\$50	1	\$115	
Total per event														
														\$414
<b>TOTAL</b>														
														<b>\$814</b>
<b>ADDITIONAL BIO-PARAMETER ANALYSES</b>														
<u>Engineering and Field Costs</u>														
SCI Labor														
			4			2							\$400	\$400
<u>Analytical laboratory</u>														
CO <sub>2</sub>														
									test	7	\$30	1	\$242	
Fe <sup>2+</sup>														
									test	7	\$30	1	\$242	
NO <sub>3</sub> , PO <sub>4</sub> , SO <sub>4</sub>														
									test	7	\$90	1	\$725	
Mn														
									test	7	\$30	1	\$242	
NH <sub>3</sub>														
									test	7	\$30	1	\$242	
Total per event														
														\$1,691
<b>TOTAL</b>														
														<b>\$2,091</b>
<b>TOTAL ESTIMATED COST</b>														
														<b>\$2,905</b>

# CHANGE ORDER NO. 1

Client	Strough Family Trust of 1983 c/o Mr. Don Strough	Agreement Date:	5/3/00
	2 Sea View Avenue	Agreement Type:	
	Piedmont, California 94611	Agreement No.	
Project Name:	327 34 <sup>th</sup> Street	Authorization Release No.	
		Change Order No.	1
SCI No.	1039.008	SCI Project Manager:	Gene Y. Ng
Client Contact:			

**PURPOSE/SCOPE OF CHANGE ORDER:**

1. Conduct research and field mapping of onsite underground culvert
2. Install and monitor 2 additional downgradient wells
3. Modify existing monitoring program to add bio-parameter analyses and the sampling of 2 new wells

CHANGE IN CONTRACT PRICE	CHANGE IN CONTRACT PERIOD OF PERFORMANCE (P.O.P)
Original Contract Price: <u>    \$12,483    </u>	Original Contract P.O.P:     _____
Previously Authorized Fee Estimate: <u>    \$12,483    </u>	Contract P.O.P Prior to This Revision:     _____
Net Increase of this Change Order: <u>    \$12,455    </u>	P.O.P Increase (Decrease) Of this Revision:     _____
New Fee Estimate: <u>    \$24,938    </u>	Net Revised P.O.P.:     _____

This Change Order shall be attached and made a part of the Service Agreement dated November 10, 1999 between Subsurface Consultants, Inc and the Strough Family Trust of 1983. All other terms and conditions of the original agreement, as mended, remain in effect and unchanged.

Subsurface Consultants, Inc.

\_\_\_\_\_  
SCI Representative  
Principal Engineer

\_\_\_\_\_  
Client Representative

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date

00 MAR 34 PM 12:18

March 30, 2000  
SCI 1039.008

Mr. Don Hwang  
Hazardous Materials Specialist  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway  
Alameda, California 94502-6577

**Groundwater Monitoring Program Modifications**  
**327 34th Street**  
**Oakland, California**

Dear Mr. Hwang:

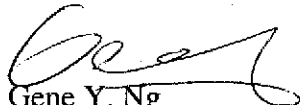
As discussed with you, the groundwater monitoring program for the referenced site will be modified to address concerns stated in your March 8, 2000 letter and during subsequent telephone conversations. The modifications are as followed:

Samples from all five existing site wells (wells MW-1 and MW-5) and the two proposed additional monitoring wells, will be analyzed for TEHd, TEHo, TVHg, BTEX, and MTBE, in addition to the following bio-parameters: carbon dioxide (CO<sub>2</sub>), ferrous iron (Fe<sup>2+</sup>), manganese (Mn), sulfate (SO<sub>4</sub><sup>2-</sup>), nitrogen as ammonia (N-NH<sub>3</sub>), nitrogen as nitrate (N-NO<sub>3</sub>), and ortho-phosphate (o-PO<sub>4</sub><sup>3-</sup>). These additional bio-parameter analyses will supplement the dissolved oxygen (DO) and pH measurements currently taken in the field to provide a more complete assessment of bioattenuation processes.

The subsequent semi-annual monitoring event will be conducted during the summer of 2000 after the owner, Strough Family Trust of 1983, receives preapproval for the new well installations from the Underground Storage Tank Cleanup Fund (Fund), and the wells are installed. If you have any questions, please call.

Yours very truly,

Subsurface Consultants, Inc.



Gene Y. Ng  
Staff Engineer

Mr. Don Hwang  
Alameda County Health Care Services Agency  
March 30, 2000  
SCI 1039.008  
Page 2

GYN: JNA: 1039.008\gwprg\_3\_2000.letter.doc

1 copy submitted

cc: Mr. Don Strough  
Strough Family Trust of 1983  
2 Sea View Avenue  
Piedmont, California 94611

Mr. Jonathan Redding, Esq.  
Wendel, Rosen, Black, & Dean, LLP  
1111 Broadway, 24<sup>th</sup> floor  
Oakland, California 94607-4036

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

March 8, 2000

Don Strough  
Strough Family Trust of 1983  
PO Box 489  
Orinda, CA 94563

Dear Mr. Strough:

Subject: Val Strough Chevrolet, 327-34<sup>th</sup> St., Oakland, CA 94609;  
StId 3035

“Groundwater Monitoring Report and Scope of Work for Additional Plume Characterization” by Subsurface Consultants, Inc., dated February 7, 2000, was reviewed. The bioparameters used, CO<sub>2</sub>, DO, and pH, may not be adequate to demonstrate bioremediation. Provide justification. The “Scope of Additional Site Characterization” is acceptable with the previous agreement that the presence of free product will be checked in all wells on a quarterly basis and if present it will be removed using a bailer and stored for proper and timely disposal. Please submit reports of the free product status including amount found, method used for removal, amount removed, etc.

If you have any questions, you may contact me at (510) 567-6746.

Sincerely,

Don Hwang  
Hazardous Materials Specialist

C: Gene Ng, Jeriann Alexander, Subsurface Consultants, Inc., 3736 Mt. Diablo Blvd.,  
Suite 200, Lafayette, CA 94549-3659

/ File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6700  
(510) 337-9432

November 08, 1999

Don Strough  
Strough Family Trust of 1983  
P.O. Box 489  
Orinda, CA 94563

STID: 3035

Re: Investigations at Val Strough Chevrolet, located at 327 34<sup>th</sup> Street, Oakland, CA 94609

Dear Mr. Strough,

I have recently been designated as the new caseworker to oversee investigations at the above site. According to our case files, one 1,000-gallon gasoline underground storage tank (UST) and one 1,000-gallon waste oil UST were removed from the site in March 1993. Soil samples collected from beneath the former tanks identified Total Petroleum Hydrocarbons as gasoline (TPHg), TPH as diesel (TPHd), and benzene, toluene, ethylbenzene, and total xylenes (BTEX). Consequently, in July 1993, three monitoring wells (MW-1 through MW-3) were installed at the site. Groundwater samples collected from these wells identified elevated levels of TPHg and BTEX. No additional groundwater samples were collected from these wells until October 1997, when free product, along with elevated contaminant concentrations, were identified in these wells. Consequently, two additional monitoring wells (MW-4 and MW-5) were installed at the site in June 1998 to further delineate the extent of the contaminant plume. Since the installation of MW-4 and MW-5, all five on-site monitoring wells have been sampled three times. Per the last groundwater monitoring event in January 1999, free product was observed in both Wells MW-2 and MW-3, and the furthest downgradient (southeasterly) on-site well, MW-4, identified 290ppb TPHg, 230ppb benzene, and 1,300ppb MTBE.

MTBE is known to migrate faster and further than TPHg and BTEX in groundwater due to its high affinity to groundwater, and is much slower to biodegrade than the other gas constituents. Consequently, this office is concerned with the elevated MTBE concentrations being identified in downgradient Well MW-4, and is requiring that the contaminant plume be further characterized/delineated. Per the "Creek and Watershed Map of Oakland & Berkeley," published by the Oakland Museum of California, there is an underground culvert running below the eastern portion of the site. The required characterization work should provide information to this office on the likelihood of this culvert acting as a conduit for contaminant plume migration.

**A workplan addressing the above required work should be submitted to this office within 60 days of the date of this letter (January 03, 2000).** Any requests for extensions of the due date, or modifications of the required tasks, should be submitted to this office in writing.

Lastly, per my conversation with Jeriann Alexander, Subsurface Consultants, Inc., on November 08, 1999, the site has received pre-approval from the State UST Cleanup Fund for continued quarterly groundwater monitoring and monthly free product removal. The next quarterly

Site  
Summary

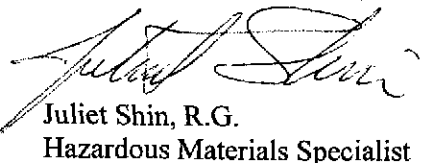
Workplan  
Due

Don Strough  
Re: 327 34<sup>th</sup> Street  
November 08, 1999  
Page 2 of 2

groundwater monitoring event and free product removal is required to be implemented within 45 days of the date of this letter (i.e., by **December 20, 1999**). A report documenting the work should be submitted to this office within 45 days after completing field activities.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

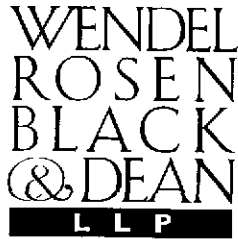


Juliet Shin, R.G.  
Hazardous Materials Specialist

Cc: Jeriann Alexander  
Subsurface Consultants, Inc.  
3736 Mt. Diablo Blvd., Ste 200  
Lafayette, CA 94549-3659

Jonathan Redding  
Wendel, Rosen, Black & Dean, LLP  
P.O. Box 2047  
Oakland, CA 94604-2047





Attorneys at Law

JMS

SFD 3035

1111 Broadway, 24th Floor  
Oakland, CA 94607-4036

Post Office Box 2047  
Oakland, CA 94604-2047

Telephone: (510) 834-6600  
Fax: (510) 834-1928  
info@wendel.com

September 8, 1999

Ms. Sofie Paredes  
Underground Storage Tank Fund Program  
State Water Resources Control Board  
Division of Clean Water  
2014 T. Street, Suite 130  
P.O. Box 944212  
Sacramento, CA 94244-2120

**Re: UST Cleanup Fund Claim Number 9198  
Project Status Update and Preapproval Request for  
Ongoing Groundwater Monitoring Services  
327 34th Street, Oakland, California**

Dear Ms. Paredes:

With this letter we are providing a project status update, as well as submitting the documentation for a preapproval of ongoing groundwater monitoring program as required by Alameda County Health Care Services Agency ("ACHCSA").

**Fund Reimbursement History**

The site received a Letter of Commitment for \$15,000 for the UST Cleanup Fund Program ("Fund") in a letter dated December 16, 1997. The Claimant (Strough Family Trust of 1983) submitted Reimbursement Request No. 1 to the Fund on March 20, 1998 in the amount of \$59,886, and received a determination of reimbursement dated May 29, 1998 in the amount of \$45,472. The Claimant submitted a request for preapproval of corrective action costs dated March 27, 1998 and received preapproval for \$32,469. The preapproved corrective actions included the following:

- ◆ Monthly water level measurements and free product removal;
- ◆ Quarterly groundwater monitoring and reporting (4 events of 5 wells);
- ◆ Soil and groundwater investigation;
- ◆ Waste disposal;

99 SEP 10 PM 3:14

ENVIRONMENTAL PROTECTION

- ◆ Regulatory agency correspondence;
- ◆ Meetings; and
- ◆ Fund reimbursement assistance.

The Claimant submitted Reimbursement Request No. 2 for \$25,417 associated with the preapproved corrective actions to the Fund on November 19, 1998 and received a determination of reimbursement dated January 21, 1999 in the amount of \$25,230. The total reimbursement to date is \$70,707.

### Next Reimbursement Request

The Claimant has incurred costs of only \$14,308 since submitting Reimbursement Request No. 2 and will be submitting Reimbursement Request No. 3 following the next groundwater monitoring event currently scheduled for September or October, 1999, depending upon the timeliness of the Fund's approval of claimant's preapproval request.<sup>1</sup>

### Regulatory Agency Correspondence and Verbal Request of Scope Change

In March 1999, the claimants' consultant, Subsurface Consultants, Inc. ("SCI") submitted the results of the third quarterly monitoring event (January 1999 event) and the results of monthly free product removal through February 1999. The report recommended modifications to the monitoring program and requested written comment from the local regulatory enforcement agency case worker, Ms. Madullah Logan of the Alameda County Health Care Services Agency ("ACHCSA"). Ms. Logan verbally requested an evaluation of whether the site would benefit from oxygen enhancement. SCI contacted the technical representative of Regeneration, a supplier of bioremediation products and discussed site conditions, and the use of ORC. Based on the low permeability of the underlying stratigraphy and the existence of free product, it was agreed that the addition of ORC would have minimal environmental returns. Upon discussing the outcome of SCI's evaluation, Ms. Logan verbally requested SCI to document the evaluation and her approval to modify the monitoring program. A copy of SCI's letter is attached as Exhibit A. **If you seek/need additional confirmation regarding the necessity for the proposed program from ACHCSA we ask that you immediately telephone Ms. Madhulla Logan at (510) 567-6764 to verify that ACHCSA has required the work which is the subject of this preapproval request.**

---

<sup>1</sup> We have not met the informal 6 month deadline for submission of our next reimbursement request because we are barely over \$10,000 and further site work has been on hold pending regulatory discussions.

### Preapproval Request

It appears clear from the correspondence with Ms. Logan at the ACHCSA that long term free product removal and groundwater monitoring is required to keep the site in compliance. To this end, the claimant is requesting the Fund to preapprove free product removal on a quarterly basis, semiannual groundwater monitoring, periodic waste removal and regulatory technical assistance in accordance with the unit costs preapproved by the Fund in their April 9, 1998 correspondence. Preapproving the unit costs for these services will streamline the project, making it less cumbersome for the claimant. As it is now, the claimant incurs costs in excess of those reimbursed by the Fund for the preparation of preapproval requests and reimbursement packages. The claimant's consultant, SCI, has agreed to keep their costs in line with their proposal dated January 16, 1998.

The estimated time frame for these ongoing services is from September 1999 to December 2000. During this time period five semi-annual groundwater monitoring events and nine free product removal events will be conducted. Waste removal will be periodically removed from the site depending on actual quantities generated. Regulatory technical assistance services will continue to be needed to correspond with the ACHCSA and Fund. Table I summarizes project costs which total \$30,993 during this time period.

### Authorized Representative

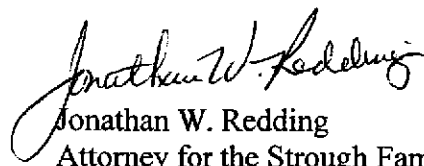
The authorized representative for the claimant is the undersigned, Mr. Jonathan Redding. Mr. Redding's new mailing address is as shown below:

Mr. Jonathan Redding  
Wendel, Rosen, Black & Dean, LLP  
P.O. Box 2047  
Oakland, CA 94604-2047  
Telephone (510) 834-6605, ex. 497.

Please do not hesitate to contact me or Ms. Jeriann Alexander of Subsurface Consultants, Inc. at (925) 299-7960 if you have any questions.

Very truly yours,

WENDEL, ROSEN, BLACK & DEAN, LLP

  
Jonathan W. Redding  
Attorney for the Strough Family Trust

JWR:kjb

Ms. Sofie Paredes  
September 8, 1999  
Page 4

WENDEL, ROSEN, BLACK & DEAN, LLP

Enclosures: SCI letter dated May 17, 1999  
Table I – Project Preapproval Cost Summary  
UST Fund Cost Preapproval Request Form

cc: Jerianne Alexander, SCI  
Don Strough  
Madhulla Logan

CALIFORNIA UNDERGROUND STORAGE TANK CLEANUP FUND  
COST PRE-APPROVAL REQUEST  
(Complete form, enclose required items, sign, date & return)

TO: Sofie Paredes Fax: (916) 227-4530

I. CLAIM INFORMATION

A. CLAIM NO. 9/98 B. CLAIMANT Strough Family Trust of 1983

C. CLAIM STATUS (complete appropriate section)

- i) LOC ISSUED FOR \$ 75,000  
ii) ON PRIORITY LIST?  YES  NO IF YES, PRIORITY CLASS  A  B  C  D  
iii) NOT YET APPLIED TO THE FUND, EXPECTED APPLICATION DATE: \_\_\_\_\_

D. CONTACT PERSON: Jonathan W. Redding, Esq. PHONE: (510) 834-6600  
ADDRESS: Wendel, Rosen, Black & Dean, LLP FAX: (510) 834-1928  
P.O. Box 2047, Oakland, CA 94604-2047

II. TYPE OF REQUEST (check appropriate boxes)

- PRE-APPROVAL \$ 30,993 AMOUNT REQUESTED  
 3-BID REVIEW \$ \_\_\_\_\_ PREFERRED BID (if applicable)

THE FOLLOWING DOCUMENTS ARE REQUIRED FOR THE SPECIFIED REQUEST. ALL DOCUMENTS REQUESTED MUST BE SUBMITTED OR THE REQUEST(S) WILL BE RETURNED UNPROCESSED.

A. REQUEST FOR PRE-APPROVAL OF PROPOSED COSTS - The following items are required before review and determination will be made by Fund Staff.

- A complete signed copy of the proposed Investigation Workplan or Corrective Action Plan (CAP) (as defined and required by Article 11, Chapter 16, California Underground Storage Tank Regulations). Corrective Action Plans must include the required feasibility study and chosen cost effective alternative. *Previously submitted and still applicable*
- A signed copy of the oversight agency approval letter for the Workplan/CAP.
- A complete copy of the Request for Bids, including all attachments. A list of all firms requested to bid must be included.
- Complete copies of all bids and other correspondence submitted in response to the Request for Bids.
- A time schedule, if not part of bid documents, anticipated for project initiation and duration.
- A detailed project budget, which includes breakdowns of staff/task/hour with associated estimated totals.

B. THREE-BID REVIEW/EVALUATION/DETERMINATION - Fund staff will assist any claimant requesting an evaluation of bids upon request. The following information must be submitted - 1,2,3 AND 4 as described in Item A above.

III. CERTIFICATION

I certify under penalty of perjury that all information submitted with this request is complete and accurate and in accordance with all applicable laws and regulations. Must be signed by claimant or person designated on the Authorized Representative Designation form.

Jonathan W. Redding Jonathan W. Redding, Esq. 9/8/99  
Signature Printed Name Date

IV. Authorization for the Fund to give out your name and phone number to other claimants in your region as a reference for consultants and contractors.  YES  NO

Jonathan W. Redding 9/8/99  
Signature Date

FILE



Subsurface Consultants, Inc.

May 17, 1999  
SCI 1039.007

Ms. Madhulla Logan  
Hazardous Materials Specialist  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway  
Alameda, California 94502-6577

**Groundwater Monitoring Program Modifications**  
327 34th Street  
Oakland, California

Dear Ms. Logan:

As discussed with you, the groundwater monitoring program for the referenced site will be modified as follows:

- The presence of free product will be checked in all wells on a quarterly basis. If present it will be removed using a bailer and stored in an appropriate container.
- All five on-site wells (Wells MW-1 through MW-5) which do not contain a sheen or free floating product will be sampled on a semi-annual basis. The testing program will include TVH, TEH, BTEX and MtBE.

The subsequent semi-annual monitoring event would be conducted in July 1999.

As a result of your inquiry of whether the site plume would benefit from oxygen enhancement, I have reviewed the site data. It appears that free product levels fluctuate seasonally in wells MW-2 and MW-3. In December 1998, 1/4 inch and 1/16 inch of product were measured in wells MW-2 and MW-3, respectively. Beads of product, a sheen and strong gasoline odors have been observed in water from well MW-2 during the subsequent events conducted in January, February, March and May 1999. Strong gasoline odors have been noticed in well MW-3 during the subsequent events. SCI consulted with Mr. Jack Peabody, a technical representative of Regenesis, a supplier of bioremediation products including ORC, regarding the field data and the feasibility of conducting a bench scale test. Mr. Peabody indicated that if ORC is placed into wells where free floating product or sheen is present you most likely would not be able to observe the effectiveness of oxygen enhancement because the hydrocarbon loading at the groundwater interface would be greater than

Ms. Madulla Logan  
Alameda County Health Care Services Agency  
May 17, 1999  
SCI 1039.007  
Page 2

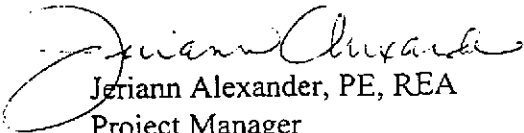
the possible oxygen input. Given the apparent variability of the presence of free product in the wells and the high likelihood that the effectiveness of ORC could not be observed in the short term, we recommend that the property owner not be required at this time to conduct the bench scale testing in these wells as you had previously requested.

As discussed in our March 31, 1999 letter, the subsurface environment is showing that natural attenuation is occurring. Free product removal and ongoing monitoring appear to be reasonable requests given that the use of the site is not changing, the plume is localized and based on the studies conducted to date has not migrated significantly from the point of release.

If you have any questions, please call.

Yours very truly,

Subsurface Consultants, Inc.

  
Jeriann Alexander, PE, REA  
Project Manager  
JNA: 1039.007\gwprg599.ltr

1 copy submitted

cc: Mr. Don Strough, Strough Family Trust of 1983  
Mr. Jonathan Redding, Esq., Fitzgerald, Abbott & Beardsley, LLP

Table 1. Fee Estimate  
 Ongoing Monitoring/Free-Product Removal  
 327 34th Street, Oakland  
 September 1999 to December 2001

TASKS	SCI LABOR								EXPENSES/SUBCONTRACTORS				ESTIMATED COSTS	
	ESTIMATED SCI LABOR (Hours)								UNIT	QUANT	COST	15% Mark-up?	TOTAL COST PER ITEM	SUB TOTALS
	SCI Personnel & Rates (\$/hr)													
	CLER	WPO	DRFT	TECH	GEO.	ENGR.	ASSOC	PRIN						
	35	35	40	60	75	80	120	140			(\$/unit)	(1 = Yes)	(\$)	(\$)
<b>1. QUARTERLY WATER LEVEL MEASUREMENTS AND FREE-PRODUCT REMOVAL</b>														
<u>Engineering Costs</u>														
SCI Labor (5 wells per event)				8		1	0.5							\$620
Vehicle Usage									hours	8	\$5.00			\$40
Mileage									miles	25	\$0.32			\$8
Supplies and Materials										1	\$200	1		\$230
Total per event														\$898
<b>TOTAL ESTIMATED COST: TASK 1 - 9 Events</b>														\$8,082
<b>2. SEMI-ANNUAL GROUNDWATER MONITORING AND REPORTING</b>														
<u>Engineering and Field Costs</u>														
SCI Labor	2		4	8		8	2	0.5						\$1,660
Vehicle Usage									hours	8	\$5.00			\$40
Mileage									miles	25	\$0.32			\$8
<u>Analytical laboratory</u>														
TVH/BTEX (EPA 8015 mod.)									test	5	\$55	1		\$318
MIBE (EPA 8260)									test	5	\$75	1		\$431
THE (EPA 8015 Mod.)									test	5	\$50	1		\$288
Total per event														\$2,743
<b>TOTAL ESTIMATED COST: TASK 2 - 5 Semi-Annual Events</b>														\$13,715
<b>3. WASTE DISPOSAL</b>														
<u>Engineering Costs</u>														
SCI Labor						8								\$640
<u>Subcontractor Costs (Drum disposal)</u>														
Drum disposal									drum	10	\$150	1		\$1,725
<b>TOTAL ESTIMATED COST: TASK 3</b>														\$2,365
<b>4. REGULATORY AGENCY CORRESPONDENCE AND MEETINGS, Alameda County Health Care Services Agency</b>														
<u>Engineering Costs</u>														
SCI Labor (4 telephone conferences, 2 meetings)						8	1							\$1,100
Mileage									miles	30	\$0.32			\$10
<b>TOTAL ESTIMATED COST: TASK 4</b>														\$1,110
<b>5. FUND REIMBURSEMENT ASSISTANCE</b>														
<u>Engineering Costs</u>														
SCI Labor (4 submittals to prepare)						20	4							\$2,080
<b>TOTAL ESTIMATED COST: TASK 5</b>														\$2,080
<b>TOTAL ESTIMATED COST</b>														\$30,993



**COPY**

State Water Resources Control Board  
Underground Storage Tank Cleanup Fund

**AUTHORIZED REPRESENTATIVE DESIGNATION FORM**

CLAIM NO. 9198

CLAIMANT NAME Donald Strough, Strough Family Trust of 1983			
SITE ADDRESS 327 34th Avenue,	CITY Oakland	STATE CA	ZIP CODE 94611
CLAIMANT NAME:			
SITE ADDRESS	CITY	STATE	ZIP CODE

The above identified claimant(s) do hereby jointly and severally appoint:

DESIGNATED AUTHORIZED REPRESENTATIVE NAME Jonathan W. Redding and/or Jean C. Fung			
COMPANY NAME Fitzgerald, Abbott & Beardsley LLP			
COMPANY ADDRESS 1221 Broadway, 21st Floor	CITY Oakland	STATE CA	ZIP CODE 94612

to sign and file documents necessary to apply to the Underground Storage Tank Cleanup Fund (Fund) for reimbursement of corrective action costs incurred at the site identified above. Any action by the above-named designated authorized representative is for me (us) and in my (our) name and for my (our) use and benefit.

I (we) hereby agree and further authorize the above-named designated authorized representative to certify that all applicable state and federal statutory and regulatory requirements pursuant to Chapter 6.75 of the Health & Safety Code (H&SC) and Chapter 18, Petroleum Underground Storage Tank Cleanup Fund Regulations, California Code of Regulations, have and will be complied with.

The signature of the above-named designated authorized representative is binding upon all claimants party to the above-identified claim.

This Authorized Representation Designation shall become effective on the date of execution and shall remain in effect until terminated, in writing, by the above-named claimant(s).

EXECUTED THIS 4<sup>th</sup> DAY OF September 19 97

AT Oakland, California

<u>[Signature]</u> CLAIMANT SIGNATURE	<u>DONALD STROUGH</u> PRINTED NAME
<u>[Signature]</u> AUTHORIZED REPRESENTATIVE SIGNATURE	 PRINTED NAME



**Subsurface Consultants, Inc.**

May 17, 1999  
SCI 1039.007

Ms. Madhulla Logan  
Hazardous Materials Specialist  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway  
Alameda, California 94502-6577

**Groundwater Monitoring Program Modifications**  
**327 34th Street**  
**Oakland, California**

Dear Ms. Logan:

As discussed with you, the groundwater monitoring program for the referenced site will be modified as follows:

- The presence of free product will be checked in all wells on a quarterly basis. If present it will be removed using a bailer and stored in an appropriate container.
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The subsequent semi-annual monitoring event would be conducted in July 1999.

As a result of your inquiry of whether the site plume would benefit from oxygen enhancement, I have reviewed the site data. It appears that free product levels fluctuate seasonally in wells MW-2 and MW-3. In December 1998, 1/4 inch and 1/16 inch of product were measured in wells MW-2 and MW-3, respectively. Beads of product, a sheen and strong gasoline odors have been observed in water from well MW-2 during the subsequent events conducted in January, February, March and May 1999. Strong gasoline odors have been noticed in well MW-3 during the subsequent events. SCI consulted with Mr. Jack Peabody, a technical representative of Regenesys, a supplier of bioremediation products including ORC, regarding the field data and the feasibility of conducting a bench scale test. Mr. Peabody indicated that if ORC is placed into wells where free floating product or sheen is present you most likely would not be able to observe the effectiveness of oxygen enhancement because the hydrocarbon loading at the groundwater interface would be greater than

Ms. Madulla Logan  
Alameda County Health Care Services Agency  
May 17, 1999  
SCI 1039.007  
Page 2

the possible oxygen input. Given the apparent variability of the presence of free product in the wells and the high likelihood that the effectiveness of ORC could not be observed in the short term, we recommend that the property owner not be required at this time to conduct the bench scale testing in these wells as you had previously requested.

As discussed in our March 31, 1999 letter, the subsurface environment is showing that natural attenuation is occurring. Free product removal and ongoing monitoring appear to be reasonable requests given that the use of the site is not changing, the plume is localized and based on the studies conducted to date has not migrated significantly from the point of release.

If you have any questions, please call.

Yours very truly,

Subsurface Consultants, Inc.



Jeriann Alexander, PE, REA  
Project Manager  
JNA: 1039.007\gwprg599.ltr

1 copy submitted

cc: Mr. Don Strough, Strough Family Trust of 1983  
Mr. Jonathan Redding, Esq., Fitzgerald, Abbott & Beardsley, LLP

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



February 17, 1998

**Don Strough**  
Concord Honda/Pontiac  
1300 Concord Avenue  
Concord, CA - 94520

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

**Ref: 327 34th Street, Oakland, CA - 94520**

Dear Mr. Strough:

I am in receipt of the workplan, dated January 16, 1998, prepared by Subsurface Consultants, Inc., for the above referenced project. This Department has reviewed the document and finds it acceptable with the following changes:

The proposed monitoring well near the tune-up/lube area should be moved to the north and hence closer to the former underground storage tank area. This would enable us to identify the extent of the plume if the groundwater gradient tends towards the east rather than the predicted west.

If you have any questions, you may reach me at (510) 567-6764.

Sincerely,

A handwritten signature in cursive script that reads "Madhulla Logan".

Madhulla Logan  
Hazardous Material Specialist

C: **Jonathan Redding**  
Fitzgerald, Abbott and Beardsley, LLP  
1221 Broadway, 21st Floor  
Oakland, CA - 94612

**Madhulla Logan**  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway, 2nd Floor  
Alameda, CA - 94502

STATE  
COMPENSATION  
INSURANCE  
FUND

P.O. BOX 420807, SAN FRANCISCO, CA 94142-0807

CERTIFICATE OF WORKERS' COMPENSATION INSURANCE

JANUARY 26, 1993

POLICY NUMBER: 1291679-93  
CERTIFICATE EXPIRES: 02-01-94

ALAMEDA COUNTY DEPT. OF ENVIRONMENTAL HEALTH  
80 SWAN WAY #200  
OAKLAND, CA 94621

JOB: 327 - 34TH ST. 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

SUBSURFACE ENVIRONMENTAL, INC.  
11072 SAN PABLO AVE. #315  
EL CERRITO, CA 94530

TMR



ALCO  
HAZMAT

93 DEC 22 PM 2:03

December 20, 1993

1/12/93

Department of Environmental Health  
Hazardous Materials Division  
80 Swan Way, Suite 200  
Oakland, Ca. 94621  
Attn.: Ms. Eva Chu

Dear Ms. Chu,

I am writing to confirm our telephone conversation today. I called requesting an extension on submitting a work plan for additional remediation work to be undertaken at Hendrick Chevrolet on **Broadway and 34th in** Oakland. In this next phase of the project a contractor will be installing additional groundwater monitoring wells to delineate the extent of contamination which may have resulted from releases of our recently pulled underground storage tanks. Additionally, we will be resampling the existing wells and submitting results. It is anticipated that this sampling will occur on a quarterly basis from now on.

I estimate that a work plan will be submitted to your office no later than January 21, 1993. This extra time is necessary to secure bids to have the work completed and to assure that a quality work plan is submitted. Please contact me if such an arrangement is not satisfactory or if you understand the situation differently.

Best regards,

*Terry Williamson*  
Terry Williamson

**Kip Prah Associates Incorporated**

Main Office: 39350 Civic Center Drive, Suite 410 • Fremont, California 94538 • (510)745-9007 • (800)486-0400 • Fax# (510)745-0111  
Southern California Office: 10805 Holder Street, Suite 165 • Cypress, California 90630 • (714)236-0182 • Fax# (714)236-0774

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 3035

September 29, 1993

Mr. Ron Tye  
Strough Family Trust  
P.O.Box 28886  
Oakland, CA 94604

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

**Subject: Additional Investigation at 327 34th St., Oakland  
94609**

Dear Mr. Tye:

I have completed review of GeoPlexus' August 19, 1993 Preliminary Site Characterization Investigation Report for the above referenced site. This report documents the installation of three groundwater monitoring wells and results of analytical testing on soil and groundwater samples collected. It appears groundwater has been impacted by the release from the former underground gasoline storage tank at this site.

This office concurs with the recommendations made in this report. Additional investigation to determine the vertical and lateral extent of the gasoline plume should be undertaken. Also a free product recovery program should be implemented as soon as possible to reduce further migration of the hydrocarbon products.

Please submit a workplan for the required investigation to this office **within 45 days of the date of this letter**. A quarterly groundwater monitoring program should be established. Water from monitoring well MW-1 should also be analyzed for chlorinated hydrocarbons, semi-volatile compounds, and metals (Cd, Cr, Pb, Zn, and Ni) in the next sampling episode.

If you have any questions, please contact me at (510) 271-4530.

eva chu  
Hazardous Materials Specialist

cc: David Glick, GeoPlexus, 1900 Wyatt Dr., Suite 1, Santa Clara, CA 95054  
KTW & Associates, 43289 Osgood Rd., Fremont, CA 94539  
files

93 SEP 24 PM 1:44

September 23, 1993

Ms. Eva Chu  
Alameda County Health Care Services Agency  
80 Swan Way, Room 200  
Oakland, CA 94621

Re: Preliminary Site Characterization Investigation Report  
Val Strough Chevrolet, 327 34th Street, Oakland, CA

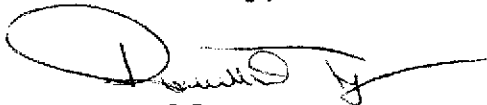
Dear Ms. Chu:

Enclosed, you will find the above referenced report. As you may know, I met with KTW & Associates this morning to review the contents of the report prepared by Geo Plexus, Inc.

I will await your further direction on this project. You may reach me at (510) 450-6608.

Thank you for your assistance.

Sincerely,



Ronald D. Tye  
Group Financial Officer

RDT:bmp

Enclosure



white -env.health  
 yellow -facility  
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH  
 Hazardous Materials Inspection Form

80 Swan Way, #200  
 Oakland, CA 94621  
 (415) 271-4320

II, III

Site ID # \_\_\_\_\_ Site Name Val Strough Chai Today's Date 8/2/93

II.A BUSINESS PLANS (Title 19)

- \_\_\_ 1. Immediate Reporting 2703
- \_\_\_ 2. Bus. Plan Sids. 25503(b)
- \_\_\_ 3. RR Cars > 30 days 25503.7
- \_\_\_ 4. Inventory Information 25504(a)
- \_\_\_ 5. Inventory Complete 2730
- \_\_\_ 6. Emergency Response 25504(b)
- \_\_\_ 7. Training 25504(c)
- \_\_\_ 8. Deficiency 25505(a)
- \_\_\_ 9. Modification 25505(b)

Site Address 327-34th St.

City Oakland Zip 94 Phone \_\_\_\_\_

\_\_\_ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- \_\_\_ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- \_\_\_ II. Business Plans, Acute Hazardous Materials
- \_\_\_ III. Underground Tanks

II.B ACUTELY HAZ. MATLS

- \_\_\_ 10. Registration Form Filed 25533(a)
- \_\_\_ 11. Form Complete 25533(b)
- \_\_\_ 12. RMPP Contents 25534(c)
- \_\_\_ 13. Implement Sch. Req'd? (Y/N)
- \_\_\_ 14. OffSite Conseq. Assess. 25524(c)
- \_\_\_ 15. Probable Risk Assessment 25534(d)
- \_\_\_ 16. Persons Responsible 25534(g)
- \_\_\_ 17. Certification 25534(f)
- \_\_\_ 18. Exemption Request? (Y/N) 25534(b)
- \_\_\_ 19. Trade Secret Requested? 25538

\* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

① bottom sample at 14.8' mod odor  
 ② \* 4' ② sidewall sample at 12.0' sl. odor  
 ③ \* ③ bottom sample at 14.0' sl. mod odor  
 gasoline ④ sidewall at 12.0' sl. odor

N ↑

10.5' bottom sample w/ sl. mod odor  
 7.0' sidewall sample w. sl. odor

w.o. tank pH

Analyze w.o. for constituents found in 1st sampling episode: Metals, semi-volatiles TPH-d

Analyze gas sample for TPH-g, BTEX and total lead

III. UNDERGROUND TANKS (Title 23)

- General
- \_\_\_ 1. Permit Application 25284 (H&S)
  - \_\_\_ 2. Pipeline Leak Detection 25292 (H&S)
  - \_\_\_ 3. Records Maintenance 2712
  - \_\_\_ 4. Release Report 2651
  - \_\_\_ 5. Closure Plans 2670

- Monitoring for Existing Tanks
- \_\_\_ 6. Method
    - 1) Monthly Test
    - 2) Daily Vadose Semi-annual groundwater One time soils
    - 3) Daily Vadose One time soils Annual tank test
    - 4) Monthly Gndwater One time soils
    - 5) Daily Inventory Annual tank testing Cont pipe leak det Vadose/gndwater mon.
    - 6) Daily Inventory Annual tank testing Cont pipe leak det
    - 7) Weekly Tank Gauge Annual tank testing
    - 8) Annual Tank Testing Daily Inventory
    - 9) Other \_\_\_\_\_

- \_\_\_ 7. Precis Tank Test 2643  
Date: \_\_\_\_\_
- \_\_\_ 8. Inventory Rec. 2644
- \_\_\_ 9. Soil Testing . 2646
- \_\_\_ 10. Ground Water. 2647

- New Tanks
- \_\_\_ 11. Monitor Plan 2632
  - \_\_\_ 12. Access. Secure 2634
  - \_\_\_ 13. Plans Submit 2711  
Date: \_\_\_\_\_
  - \_\_\_ 14. As Built 2635  
Date: \_\_\_\_\_

Rev 6/88

II, III

Contact: Penny Williams  
 Title: CONSULTANT  
 Signature: Penny Williams

Inspector: ESA Chy  
 Signature: [Signature]

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



*copy*

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 3035

July 15, 1993

Mr. Terry Williamson  
KPA  
39350 Civic Center Dr., Suite 410  
Fremont, CA 94538

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

**Subject: Approval of Workplan for Monitoring Well Installation at  
327 34 St., Oakland, CA 94609**

Dear Mr. Williamson:

I have reviewed the site plan for the addition of a third monitoring well for preliminary groundwater investigation at the above referenced site. The revised workplan is acceptable and field work should commence within 60 days. Please notify this office 48 hours prior to the start of field activity.

If there are other changes or questions, please contact me at (510) 271-4530.

Sincerely,

eva chu  
Hazardous Materials Specialist

cc: David Glick, KTW, 43289 Osgood Rd., Fremont, CA 94539  
Ron Tye, P.O.Box 28886, Oakland, CA 94604  
files

vstrochev.3

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 3035

June 11, 1993

Mr. Terry Williamson  
KPA  
39350 Civic Center Dr., Suite 410  
Fremont, CA 94538

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

**Subject: Workplan for Monitoring Well Installation at Former Val  
Strough Chevrolet, 327 34th St., Oakland 94609**

Dear Mr. Williamson:

I have completed review of KTW's Work Plan For Installation of Two Monitoring Wells, dated June 2, 1993, for the above referenced site. It should be noted that groundwater flow direction cannot be confirmed with only two monitoring wells. Unless there is an appropriate third well within 100' of the site, another monitoring well will be required. Please incorporate the necessary changes into the workplan and include the location of the third well on the site plan. The amended workplan should be submitted to this office within 30 days of the date of this letter. Once the plan is approved, field work should commence within 60 days.

If you have any comments or questions, please contact me at (510) 271-4530.

Sincerely,

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

eva chu  
Hazardous Materials Specialist

cc: David Glick, KTW, 43289 Osgood Rd., Fremont 94539  
Ron Tye, P.O.Box 28886, Oakland, CA 94604  
files

vstrochev.2

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

Stid 3035

April 30, 1993

Mr. Ron Tye  
Strough Family Trust  
P.O.Box 28886  
Oakland, CA 94604

**Subject: PSA for Val Strough Chevrolet, 327 34th St., Oakland**

Dear Mr. Tye:

This office has completed review of Subsurface Environmental's Soils Sampling Report, dated April 11, 1993, for the above referenced site. Four soil samples total taken from native soil beneath the two underground storage tanks (USTs), which were removed on March 4, 1993, exhibited up to 110 parts per million total petroleum hydrocarbons as gasoline (ppm TPH-G), and 96ppm TPH as diesel.

At this time additional investigations are necessary to determine the extent and severity of soil and groundwater contamination at this site due to the unauthorized release of petroleum products.

Such an investigation shall be in the form of a **Preliminary Site Assessment**, or PSA. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, the State Water Resources Control Board LUFT Field Manual, and Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached Appendix A.

The PSA proposal is due **within 45 days** of the date of this letter. Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for RWQCB "sign off." All reports and proposals must be submitted under seal of a California Registered Geologist, Certified Engineering Geologist, or Registered Civil Engineer.

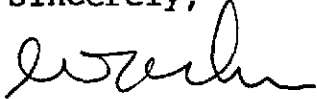
Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB. Copies of all proposals and reports must also be sent to Mr. Richard Hiatt of the RWQCB.

Mr. Ron Tye  
re: Val Strough Chevrolet, 327 34th St., Oak.  
April 30, 1993

Page 2

Should you have any questions about the content of this letter,  
please contact me at (510) 271-4530.

Sincerely,



Eva Chu  
Hazardous Materials Specialist

enclosure

cc: Rich Hiatt, RWQCB

~~file~~

vstrochev

LOP - CHANGE RECORD REQUEST FORM

printed:  
02/17/2000

Mark Out What Needs Changing and Hand to LOP Data Entry  
(Name/Address changes go to Annual Programs Data Entry)

Insp:

AGENCY # : 10000      SOURCE OF FUNDS: F      SUBSTANCE: 8006619  
 StID : 3035      LOC: \*\*\*\*\*  
 SITE NAME: Val Strough Chevrolet      DATE REPORTED : 03/14/1993  
 ADDRESS : 327 34th St      DATE CONFIRMED: 03/14/1993  
 CITY/ZIP : Oakland      94609      MULTIPLE RPS : Y

SITE STATUS

CASE TYPE: O CONTRACT STATUS: 4      PRIOR CODE:      EMERGENCY RESP:  
 RP SEARCH: S      DATE COMPLETED: 02/24/1994  
 PRELIMINARY ASMNT: U      DATE UNDERWAY: 07/21/1993      DATE COMPLETED:  
 REM INVESTIGATION:      DATE UNDERWAY:      DATE COMPLETED:  
 REMEDIAL ACTION:      DATE UNDERWAY:      DATE COMPLETED:  
 POST REMED ACT MON:      DATE UNDERWAY:      DATE COMPLETED:

ENFORCEMENT ACTION TYPE: 1      DATE ENFORCEMENT ACTION TAKEN: 02/24/1994  
 LUFT FIELD MANUAL CONSID: 3HSCWG  
 CASE CLOSED:      DATE CASE CLOSED:  
 DATE EXCAVATION STARTED :      REMEDIAL ACTIONS TAKEN:

RESPONSIBLE PARTY INFORMATION

RP#1-CONTACT NAME: Attn. Don Strough  
 COMPANY NAME: Strough Family Trust  
 ADDRESS: P. O. Box 489  
 CITY/STATE: Orinda, C A 94563

RP#2-CONTACT NAME: Ron Tye, hendrick A G  
 COMPANY NAME: V S G C I Of Oakland  
 ADDRESS: 4345 Rosewood Dr.  
 CITY/STATE: Pleasanton, C A 94588

INSPECTOR VERIFICATION:

NAME _____	SIGNATURE _____	DATE _____
------------	-----------------	------------

DATA ENTRY INPUT:

Name/Address Changes Only

Case Progress Changes

ANNPGMS \_\_\_\_\_ LOP \_\_\_\_\_ DATE \_\_\_\_\_

LOP \_\_\_\_\_ DATE \_\_\_\_\_

white -env.health  
yellow -facility  
pink -files

# ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200  
Oakland, CA 94621  
(415) 271-4320

## Hazardous Materials Division Inspection Form

Site ID# 3035 Site Name Val Strong Today's Date 3.14.93  
 Site Address 327 34<sup>th</sup> St EPA ID# \_\_\_\_\_  
 City Oakland Zip 94609 Phone \_\_\_\_\_

MAX Amt. Stored > 500lbs/55g/200cf?  Y  N  
 Hazardous Waste generated per month? \_\_\_\_\_

**Inspection Categories:**

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks → Removal

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

**IA GENERATOR (Title 22)**

	1. Waste ID	* 66471
	2. EPA ID	66472
	3. > 90 days	66508
	4. Label dates	66508
	5. Biennial	66493
Manifest	6. Records	66492
	7. Correct	66484
	8. Copy sent	66492
	9. Exception	66484
	10. Copies Rec'd	66492
Misc.	11. Treatment	66371
	12. On-site Disp. (H.S.&C.)	26189.5
	13. Ex Haz. Waste	66570
Prevention	14. Communications	67121
	15. Aisle Space	67124
	16. Local Authority	67126
	17. Maintenance	67120
	18. Training	67105
Contn. Agency	19. Prepared	67140
	20. Name List	67141
	21. Copies	67141
	22. Emg. Coord. Trng.	67144
Containers, Tanks	23. Condition	67241
	24. Compatibility	67242
	25. Maintenance	67243
	26. Inspection	67244
	27. Buffer Zone	67246
	28. Tank Inspection	67259
	29. Containment	67245
	30. Safe Storage	67261
	31. Freeboard	67257

**Comments:**

on site for removal of 2 USB (LFL 190) of 2 1000 m tanks - (02 396)  
 The North gasoline tank's lid is pit ~ 8' as verified OED - Gary Collins of OED.  
 There appears to be heavy contamination in the soil odor, stained soil observed small amount water in pit. No apparent holes in tank.  
 Samples to be taken at both ends of gasoline tank.  
 Note - Product still in 1000 gallon Waste oil tank - unable to remove tank - must re-schedule.  
 To be sampled for BTEX, TPH-G.  
 Sample 1 North end lat 40' - stained clay  
 Sample 2 South end at ~ 10 - stained clay  
 (Required actions)  
 ① Triple rinse, pressure wash and Cap associated piping to gasoline tank - Call this office prior to completing task.  
 ② Remove all residual waste oil intact and provide this office with 24 hours notice prior to removal of tank.

**IB TRANSPORTER (Title 22)**

	32. Applic./Insurance	66428
	33. Comp. Cert./CHP Insp.	66448
	34. Containers	66465
Manifest	35. Vehicles	66465
	36. EPA ID #s	66531
	37. Correct	66541
	38. HW Delivery	66543
	39. Records	66544
Cont'n	40. Name/ Covers	66545
	41. Recyclables	66800

Rev 6/88

Contact: X Roxanne Harris

Title: X Contractor

Signature: [Signature]

Embro manifest # 92284A39

Inspector: Brian Johnson, S.

Signature: \_\_\_\_\_

DATE:  
TO : Local Oversight Program  
FROM:  
SUBJ: Transfer of Eligible Local Oversight Case

Site name: Val Strough Chev  
Address: 327 34th ST city \_\_\_\_\_ Zip \_\_\_\_\_

TO BE ELLIGIBLE FOR LOP A CASE MUST MEET 3 QUALIFICATIONS:

1. Number of Tanks: 2 removed? Y N Date of removal 3-4-5-93
2. Samples received?  Y N Contamination level: 110 ppm  
(ppm and type of test)

Contamination should be over 100 ppm TPH to qualify for LOP

3. Petroleum Y N Types: Avgas Jet leaded unleaded Diesel  
fuel oil waste oil kerosene solvents

DepRef remaining \$ 0 Closed with Candace/Leslie?  Y N  
(If no explain why?)

IF YOUR SITE MEETS ALL OF THE ABOVE QUALIFICATIONS YOU SHOULD DO THE FOLLOWING TO TRANSFER THE SITE:

1. YOU MUST CLOSE THE DEPOSIT REFUND CASE AT THIS TIME. YOU MUST ACCOUNT FOR ALL TIME YOU HAVE SPENT ON THE CASE AND TURN IN THE ACCOUNT SHEET TO LESLIE. IF THERE ARE FUNDS STILL REMAINING IT IS STILL BETTER TO TRANSFER THE CASE TO LOP AS THE RATE FOR LOP ALLOWS THE ADDITION OF MANAGEMENT AND CLERICAL TIME. DO NOT ATTEMPT TO CONTINUE TO OVERSEE THE SITE SIMPLY BECAUSE THERE ARE FUNDS REMAINING!
2. COMPLETE THE A AND B PERMIT APPLICATION FORMS AND GIVE TO CONNIE/ELAINE
3. GIVE THE ENTIRE CASE TO THE PROPER LOP STAFF UPSTAIRS FOR THEM TO DO THE REST OF THE TRANSFER AND YOU ARE DONE!



RP. ~~the~~ Strough Family  
Trust. Ron Tye  
Attn: ~~(Donald Strough)~~

P.O. Box 28886

Oakland 94604

---

#4 Gerry Rusk  
Seaside, CA

STATE OF CALIFORNIA  
STATE WATER RESOURCES CONTROL BOARD  
UNDERGROUND STORAGE TANK PERMIT APPLICATION - FORM A



COMPLETE THIS FORM FOR EACH FACILITY/SITE

MARK ONLY ONE ITEM	<input type="checkbox"/> 1 NEW PERMIT	<input type="checkbox"/> 3 RENEWAL PERMIT	<input type="checkbox"/> 5 CHANGE OF INFORMATION	<input type="checkbox"/> 7 PERMANENTLY CLOSED SITE
	<input type="checkbox"/> 2 INTERIM PERMIT	<input type="checkbox"/> 4 AMENDED PERMIT	<input type="checkbox"/> 6 TEMPORARY SITE CLOSURE	

I. FACILITY/SITE INFORMATION & ADDRESS - (MUST BE COMPLETED)

DBA OR FACILITY NAME <i>Val Strough Chevrolet</i>		NAME OF OPERATOR <i>Ron Tye</i>			
ADDRESS <i>327-34th street</i>		NEAREST CROSS STREET <i>BROADWAY</i>	PARCEL # (OPTIONAL)		
CITY NAME <i>Oakland</i>		STATE <i>CA</i>	ZIP CODE <i>94609</i>	SITE PHONE # WITH AREA CODE <i>510 450 6608</i>	
<input checked="" type="checkbox"/> BOX TO INDICATE <input checked="" type="checkbox"/> CORPORATION <input type="checkbox"/> INDIVIDUAL <input type="checkbox"/> PARTNERSHIP <input type="checkbox"/> LOCAL-AGENCY DISTRICTS <input type="checkbox"/> COUNTY-AGENCY <input type="checkbox"/> STATE-AGENCY <input type="checkbox"/> FEDERAL-AGENCY					
TYPE OF BUSINESS <input type="checkbox"/> 1 GAS STATION <input type="checkbox"/> 2 DISTRIBUTOR <input type="checkbox"/> 3 FARM <input type="checkbox"/> 4 PROCESSOR <input checked="" type="checkbox"/> 5 OTHER		<input type="checkbox"/> IF INDIAN RESERVATION OR TRUST LANDS	# OF TANKS AT SITE <i>2</i>	E. P. A. I. D. # (optional)	

EMERGENCY CONTACT PERSON (PRIMARY)

EMERGENCY CONTACT PERSON (SECONDARY) - optional

DAYS: NAME (LAST, FIRST) <i>HARRIS, Roxanne</i>	PHONE # WITH AREA CODE <i>510 215 2533</i>	DAYS: NAME (LAST, FIRST) <i>Tye, Ron</i>	PHONE # WITH AREA CODE <i>510 450 6608</i>
NIGHTS: NAME (LAST, FIRST) <i>HARRIS, Roxanne</i>	PHONE # WITH AREA CODE <i>510 559 9275</i>	NIGHTS: NAME (LAST, FIRST)	PHONE # WITH AREA CODE

II. PROPERTY OWNER INFORMATION - (MUST BE COMPLETED)

NAME <i>Strough Family Trust</i>		CARE OF ADDRESS INFORMATION		
MAILING OR STREET ADDRESS <i>#4 Geary Plaza</i>		<input checked="" type="checkbox"/> box to indicate <input type="checkbox"/> INDIVIDUAL <input type="checkbox"/> LOCAL-AGENCY <input type="checkbox"/> STATE-AGENCY <input type="checkbox"/> CORPORATION <input type="checkbox"/> PARTNERSHIP <input type="checkbox"/> COUNTY-AGENCY <input type="checkbox"/> FEDERAL-AGENCY		
CITY NAME <i>Seaside</i>		STATE <i>CA</i>	ZIP CODE	PHONE # WITH AREA CODE <i>408/899-8300</i>

III. TANK OWNER INFORMATION - (MUST BE COMPLETED)

NAME OF OWNER <i>VSOCI of Oakland, Inc.</i>		CARE OF ADDRESS INFORMATION		
MAILING OR STREET ADDRESS <i>PO BOX 28886</i>		<input checked="" type="checkbox"/> box to indicate <input type="checkbox"/> INDIVIDUAL <input type="checkbox"/> LOCAL-AGENCY <input type="checkbox"/> STATE-AGENCY <input type="checkbox"/> CORPORATION <input type="checkbox"/> PARTNERSHIP <input type="checkbox"/> COUNTY-AGENCY <input type="checkbox"/> FEDERAL-AGENCY		
CITY NAME <i>Oakland</i>		STATE <i>CA</i>	ZIP CODE <i>94604</i>	PHONE # WITH AREA CODE <i>510/58-4700</i>

IV. BOARD OF EQUALIZATION UST STORAGE FEE ACCOUNT NUMBER - Call (916) 323-9555 if questions arise.

TY (TK) HQ

V. PETROLEUM UST FINANCIAL RESPONSIBILITY - (MUST BE COMPLETED) - IDENTIFY THE METHOD(S) USED

<input checked="" type="checkbox"/> box to indicate	<input type="checkbox"/> 1 SELF-INSURED	<input type="checkbox"/> 2 GUARANTEE	<input checked="" type="checkbox"/> 3 INSURANCE	<input type="checkbox"/> 4 SURETY BOND
	<input type="checkbox"/> 5 LETTER OF CREDIT	<input type="checkbox"/> 6 EXEMPTION	<input type="checkbox"/> 99 OTHER	

VI. LEGAL NOTIFICATION AND BILLING ADDRESS Legal notification and billing will be sent to the tank owner unless box I or II is checked.

CHECK ONE BOX INDICATING WHICH ABOVE ADDRESS SHOULD BE USED FOR LEGAL NOTIFICATIONS AND BILLING: I.  II.  III.

THIS FORM HAS BEEN COMPLETED UNDER PENALTY OF PERJURY, AND TO THE BEST OF MY KNOWLEDGE, IS TRUE AND CORRECT

APPLICANT'S NAME (PRINTED & SIGNATURE) <i>Roxanne Harris</i>	APPLICANT'S TITLE <i>Contractor/Pres.</i>	DATE MONTH/DAY/YEAR <i>January 25, 1993</i>
---	--	--

COUNTY # <input type="text" value="0"/> <input type="text" value="0"/>	JURISDICTION # <input type="text" value="0"/> <input type="text" value="0"/>	FACILITY # <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="0"/>
LOCATION CODE - OPTIONAL	CENSUS TRACT # - OPTIONAL	SUPVISOR - DISTRICT CODE - OPTIONAL

THIS FORM MUST BE ACCOMPANIED BY AT LEAST (1) OR MORE PERMIT APPLICATION - FORM B, UNLESS THIS IS A CHANGE OF SITE INFORMATION ONLY.

STATE OF CALIFORNIA  
STATE WATER RESOURCES CONTROL BOARD  
**UNDERGROUND STORAGE TANK PERMIT APPLICATION - FORM B**



COMPLETE A SEPARATE FORM FOR EACH TANK SYSTEM.

<b>MARK ONLY ONE ITEM</b>	<input type="checkbox"/> 1 NEW PERMIT	<input type="checkbox"/> 3 RENEWAL PERMIT	<input type="checkbox"/> 5 CHANGE OF INFORMATION	<input type="checkbox"/> 7 PERMANENTLY CLOSED ON SITE
	<input type="checkbox"/> 2 INTERIM PERMIT	<input type="checkbox"/> 4 AMENDED PERMIT	<input type="checkbox"/> 6 TEMPORARY TANK CLOSURE	<input checked="" type="checkbox"/> 8 TANK REMOVED

DBA OR FACILITY NAME WHERE TANK IS INSTALLED: \_\_\_\_\_

**I. TANK DESCRIPTION** COMPLETE ALL ITEMS -- SPECIFY IF UNKNOWN

A. OWNER'S TANK I.D.# <u>NONE</u>	B. MANUFACTURED BY: <u>UNKNOWN</u>
C. DATE INSTALLED (MO/DAY/YEAR) <u>UNKNOWN</u>	D. TANK CAPACITY IN GALLONS: <u>1000</u>

**II. TANK CONTENTS** IF A-1 IS MARKED, COMPLETE ITEM C.

A. <input type="checkbox"/> 1 MOTOR VEHICLE FUEL	4 OIL	B. <input type="checkbox"/> 1 PRODUCT	C. <input checked="" type="checkbox"/> 1a REGULAR UNLEADED	3 DIESEL	6 AVIATION GAS
<input type="checkbox"/> 2 PETROLEUM	80 EMPTY	<input type="checkbox"/> 2 WASTE	<input type="checkbox"/> 1b PREMIUM UNLEADED	4 GASAHOL	7 METHANOL
<input type="checkbox"/> 3 CHEMICAL PRODUCT	95 UNKNOWN		<input type="checkbox"/> 2 LEADED	5 JET FUEL	99 OTHER (DESCRIBE IN ITEM D. BELOW)

D. IF (A.1) IS NOT MARKED, ENTER NAME OF SUBSTANCE STORED \_\_\_\_\_ C. A. S. #: \_\_\_\_\_

**III. TANK CONSTRUCTION** MARK ONE ITEM ONLY IN BOXES A, B, AND C, AND ALL THAT APPLIES IN BOX D AND E

A. TYPE OF SYSTEM	3 SINGLE WALL WITH EXTERIOR LINER	95 UNKNOWN
<input checked="" type="checkbox"/> 1 DOUBLE WALL	4 SECONDARY CONTAINMENT (VAULTED TANK)	99 OTHER _____
<input checked="" type="checkbox"/> 2 SINGLE WALL		

B. TANK MATERIAL (Primary Tank)	3 FIBERGLASS	4 STEEL CLAD W/ FIBERGLASS REINFORCED PLASTIC
<input checked="" type="checkbox"/> 1 BARE STEEL	7 ALUMINUM	8 100% METHANOL COMPATIBLE W/FRP
<input type="checkbox"/> 2 STAINLESS STEEL	95 UNKNOWN	99 OTHER _____
<input type="checkbox"/> 5 CONCRETE		
<input type="checkbox"/> 6 POLYVINYL CHLORIDE		
<input type="checkbox"/> 9 BRONZE		
<input type="checkbox"/> 10 GALVANIZED STEEL		

C. INTERIOR LINING	3 EPOXY LINING	4 PHENOLIC LINING
<input type="checkbox"/> 1 RUBBER LINED	<input checked="" type="checkbox"/> 6 UNLINED	99 OTHER _____
<input type="checkbox"/> 5 GLASS LINING	95 UNKNOWN	
<input type="checkbox"/> 2 ALKYD LINING		

IS LINING MATERIAL COMPATIBLE WITH 100% METHANOL? YES \_\_\_ NO \_\_\_

D. CORROSION PROTECTION	3 VINYL WRAP	4 FIBERGLASS REINFORCED PLASTIC
<input type="checkbox"/> 1 POLYETHYLENE WRAP	<input checked="" type="checkbox"/> 95 UNKNOWN	99 OTHER _____
<input type="checkbox"/> 2 COATING		
<input type="checkbox"/> 5 CATHODIC PROTECTION		
<input type="checkbox"/> 91 NONE		

E. SPILL AND OVERFILL SPILL CONTAINMENT INSTALLED (YEAR) N/A OVERFILL PREVENTION EQUIPMENT INSTALLED (YEAR) N/A

**IV. PIPING INFORMATION** CIRCLE A IF ABOVE GROUND OR U IF UNDERGROUND, BOTH IF APPLICABLE

A. SYSTEM TYPE	2 PRESSURE	3 GRAVITY	99 OTHER
<input checked="" type="checkbox"/> 1 SUCTION	<input type="checkbox"/> 95 UNKNOWN	<input type="checkbox"/> 99 OTHER _____	

B. CONSTRUCTION	2 DOUBLE WALL	3 LINED TRENCH	95 UNKNOWN	99 OTHER
<input checked="" type="checkbox"/> 1 SINGLE WALL	<input type="checkbox"/> 99 OTHER _____			

C. MATERIAL AND CORROSION PROTECTION	2 STAINLESS STEEL	3 POLYVINYL CHLORIDE (PVC)	4 FIBERGLASS PIPE
<input checked="" type="checkbox"/> 1 BARE STEEL	<input type="checkbox"/> 7 STEEL W/ COATING	<input type="checkbox"/> 8 100% METHANOL COMPATIBLE W/FRP	<input type="checkbox"/> 99 OTHER _____
<input type="checkbox"/> 5 ALUMINUM	<input type="checkbox"/> 95 UNKNOWN		
<input type="checkbox"/> 6 CONCRETE			
<input type="checkbox"/> 9 GALVANIZED STEEL			
<input type="checkbox"/> 10 CATHODIC PROTECTION			

D. LEAK DETECTION  1 AUTOMATIC LINE LEAK DETECTOR  2 LINE TIGHTNESS TESTING  3 INTERSTITIAL MONITORING  99 OTHER

**V. TANK LEAK DETECTION**

<input type="checkbox"/> 1 VISUAL CHECK	<input type="checkbox"/> 3 VADOZE MONITORING	<input type="checkbox"/> 4 AUTOMATIC TANK GAUGING	<input type="checkbox"/> 5 GROUND WATER MONITORING
<input type="checkbox"/> 2 INVENTORY RECONCILIATION	<input type="checkbox"/> 95 UNKNOWN	<input type="checkbox"/> 99 OTHER	
<input type="checkbox"/> 6 TANK TESTING	<input type="checkbox"/> 91 NONE		
<input type="checkbox"/> 7 INTERSTITIAL MONITORING			

**VI. TANK CLOSURE INFORMATION**

1. ESTIMATED DATE LAST USED (MO/DAY/YR) <u>JANUARY 25, 1993</u>	2. ESTIMATED QUANTITY OF SUBSTANCE REMAINING _____ GALLONS	3. WAS TANK FILLED WITH INERT MATERIAL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
--	--	---

THIS FORM HAS BEEN COMPLETED UNDER PENALTY OF PERJURY, AND TO THE BEST OF MY KNOWLEDGE, IS TRUE AND CORRECT

APPLICANT'S NAME (PRINTED & SIGNATURE) <u>Roxanne Harris</u>	DATE <u>1/25/93</u>
--	---------------------

**LOCAL AGENCY USE ONLY** THE STATE I.D. NUMBER IS COMPOSED OF THE FOUR NUMBERS BELOW

STATE I.D.#	COUNTY #	JURISDICTION #	FACILITY #	TANK #

PERMIT NUMBER	PERMIT APPROVED BY/DATE	PERMIT EXPIRATION DATE
---------------	-------------------------	------------------------

STATE OF CALIFORNIA  
STATE WATER RESOURCES CONTROL BOARD  
**UNDERGROUND STORAGE TANK PERMIT APPLICATION - FORM B**



COMPLETE A SEPARATE FORM FOR EACH TANK SYSTEM.

<b>MARK ONLY ONE ITEM</b>	<input type="checkbox"/> 1 NEW PERMIT	<input type="checkbox"/> 3 RENEWAL PERMIT	<input type="checkbox"/> 5 CHANGE OF INFORMATION	<input type="checkbox"/> 7 PERMANENTLY CLOSED ON SITE
	<input type="checkbox"/> 2 INTERIM PERMIT	<input type="checkbox"/> 4 AMENDED PERMIT	<input type="checkbox"/> 6 TEMPORARY TANK CLOSURE	<input checked="" type="checkbox"/> 8 TANK REMOVED

**DBA OR FACILITY NAME WHERE TANK IS INSTALLED:**

<b>I. TANK DESCRIPTION</b> COMPLETE ALL ITEMS -- SPECIFY IF UNKNOWN	
A. OWNER'S TANK I.D.# <u>none</u>	B. MANUFACTURED BY: <u>UNKNOWN</u>
C. DATE INSTALLED (MO/DAY/YEAR) <u>UNKNOWN</u>	D. TANK CAPACITY IN GALLONS: <u>550 1000 600</u>

<b>II. TANK CONTENTS</b> IF A-1 IS MARKED, COMPLETE ITEM C.	
A. <input type="checkbox"/> 1 MOTOR VEHICLE FUEL <input type="checkbox"/> 2 PETROLEUM <input type="checkbox"/> 3 CHEMICAL PRODUCT <input checked="" type="checkbox"/> 4 OIL <input type="checkbox"/> 80 EMPTY <input type="checkbox"/> 95 UNKNOWN	B. <input type="checkbox"/> 1 PRODUCT <input type="checkbox"/> 2 WASTE C. <input type="checkbox"/> 1a REGULAR UNLEADED <input type="checkbox"/> 1b PREMIUM UNLEADED <input type="checkbox"/> 2 LEADED <input type="checkbox"/> 3 DIESEL <input type="checkbox"/> 4 GASAHOL <input type="checkbox"/> 5 JET FUEL <input type="checkbox"/> 6 AVIATION GAS <input type="checkbox"/> 7 METHANOL <input type="checkbox"/> 99 OTHER (DESCRIBE IN ITEM D. BELOW)
D. IF (A.1) IS NOT MARKED, ENTER NAME OF SUBSTANCE STORED _____ C. A. S. #: _____	

<b>III. TANK CONSTRUCTION</b> MARK ONE ITEM ONLY IN BOXES A, B, AND C, AND ALL THAT APPLIES IN BOX D		
A. TYPE OF SYSTEM <input type="checkbox"/> 1 DOUBLE WALL <input checked="" type="checkbox"/> 2 SINGLE WALL <input type="checkbox"/> 3 SINGLE WALL WITH EXTERIOR LINER <input type="checkbox"/> 4 SECONDARY CONTAINMENT (VAULTED TANK) <input type="checkbox"/> 95 UNKNOWN <input type="checkbox"/> 99 OTHER	B. TANK MATERIAL (Primary Tank) <input checked="" type="checkbox"/> 1 BARE STEEL <input type="checkbox"/> 2 STAINLESS STEEL <input type="checkbox"/> 3 FIBERGLASS <input type="checkbox"/> 4 STEEL CLAD W/ FIBERGLASS REINFORCED PLASTIC <input type="checkbox"/> 5 CONCRETE <input type="checkbox"/> 6 POLYVINYL CHLORIDE <input type="checkbox"/> 7 ALUMINUM <input type="checkbox"/> 8 100% METHANOL COMPATIBLE W/FRP <input type="checkbox"/> 9 BRONZE <input type="checkbox"/> 10 GALVANIZED STEEL <input type="checkbox"/> 95 UNKNOWN <input type="checkbox"/> 99 OTHER	C. INTERIOR LINING <input type="checkbox"/> 1 RUBBER LINED <input type="checkbox"/> 2 ALKYD LINING <input type="checkbox"/> 3 EPOXY LINING <input type="checkbox"/> 4 PHENOLIC LINING <input type="checkbox"/> 5 GLASS LINING <input checked="" type="checkbox"/> 6 UNLINED <input type="checkbox"/> 95 UNKNOWN <input type="checkbox"/> 99 OTHER IS LINING MATERIAL COMPATIBLE WITH 100% METHANOL? YES ___ NO ___
D. CORROSION PROTECTION <input type="checkbox"/> 1 POLYETHYLENE WRAP <input type="checkbox"/> 2 COATING <input type="checkbox"/> 3 VINYL WRAP <input type="checkbox"/> 4 FIBERGLASS REINFORCED PLASTIC <input type="checkbox"/> 5 CATHODIC PROTECTION <input type="checkbox"/> 91 NONE <input checked="" type="checkbox"/> 95 UNKNOWN <input type="checkbox"/> 99 OTHER		

<b>IV. PIPING INFORMATION</b> CIRCLE A IF ABOVE GROUND OR U IF UNDERGROUND, BOTH IF APPLICABLE				
A. SYSTEM TYPE	A U 1 SUCTION	A U 2 PRESSURE	A U 3 GRAVITY	A U 99 OTHER
B. CONSTRUCTION	A U 1 SINGLE WALL	A U 2 DOUBLE WALL	A U 3 LINED TRENCH	A U 95 UNKNOWN A U 99 OTHER
C. MATERIAL AND CORROSION PROTECTION	A U 1 BARE STEEL	A U 2 STAINLESS STEEL	A U 3 POLYVINYL CHLORIDE (PVC)	A U 4 FIBERGLASS PIPE
	A U 5 ALUMINUM	A U 6 CONCRETE	A U 7 STEEL W/ COATING	A U 8 100% METHANOL COMPATIBLE W/FRP
	A U 9 GALVANIZED STEEL	A U 10 CATHODIC PROTECTION	A U 95 UNKNOWN	A U 99 OTHER
D. LEAK DETECTION	<input type="checkbox"/> 1 AUTOMATIC LINE LEAK DETECTOR	<input type="checkbox"/> 2 LINE TIGHTNESS TESTING	<input type="checkbox"/> 3 INTERSTITIAL MONITORING	<input type="checkbox"/> 99 OTHER

<b>V. TANK LEAK DETECTION</b>				
<input type="checkbox"/> 1 VISUAL CHECK	<input type="checkbox"/> 2 INVENTORY RECONCILIATION	<input type="checkbox"/> 3 VAPOR MONITORING	<input type="checkbox"/> 4 AUTOMATIC TANK GAUGING	<input type="checkbox"/> 5 GROUND WATER MONITORING
<input type="checkbox"/> 6 TANK TESTING	<input type="checkbox"/> 7 INTERSTITIAL MONITORING	<input type="checkbox"/> 91 NONE	<input checked="" type="checkbox"/> 95 UNKNOWN	<input type="checkbox"/> 99 OTHER

<b>VI. TANK CLOSURE INFORMATION</b>		
1. ESTIMATED DATE LAST USED (MO/DAY/YR) <u>January 25, 1993</u>	2. ESTIMATED QUANTITY OF SUBSTANCE REMAINING <u>0</u> GALLONS	3. WAS TANK FILLED WITH INERT MATERIAL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>

THIS FORM HAS BEEN COMPLETED UNDER PENALTY OF PERJURY, AND TO THE BEST OF MY KNOWLEDGE, IS TRUE AND CORRECT

APPLICANT'S NAME (PRINTED & SIGNATURE) <u>Roxanne Harris</u>	DATE <u>1/25/93</u>
---	------------------------

<b>LOCAL AGENCY USE ONLY</b> THE STATE I.D. NUMBER IS COMPOSED OF THE FOUR NUMBERS BELOW			
STATE I.D.#	COUNTY #	JURISDICTION #	FACILITY #
PERMIT NUMBER	PERMIT APPROVED BY/DATE	PERMIT EXPIRATION DATE	TANK #

*Greg P. Olson 2/17/93*

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY  
DEPARTMENT OF ENVIRONMENTAL HEALTH  
HAZARDOUS MATERIALS DIVISION

80 SWAN LANE, ROOM 200  
OAKLAND, CA 94621  
PHONE: 510/273-4380

**ACCEPTED**  
Underground Storage Tank Closure Permit Application  
Alameda County Division of Hazardous Materials  
80 Swan Way, Suite 200,  
Oakland, CA 94621  
Telephone: (510) 271-4320

These closure/removal plans have been received and found to be acceptable and essentially meet the requirements of State and Local Health Laws. Changes to your closure plans indicated by this Department are to assure compliance with State and local laws. The project proposal herein is now released for issuance of any required permits, for construction/destroying of any required buildings, etc. This must be on the job and on file with the Department. Only copy of the accepted plans involved with the removal of all contractors and craftsmen involved with the removal of any required buildings, etc. Any changes or alterations of these plans and specifications submitted to this Department and to the Fire and Inspections Department to determine if such changes meet the requirements of State and local laws.

Notify this Department at least 72 hours prior to the required inspections: \*

- Removal of Tank(s) and Piping
- Sampling
- Final Inspection

Issuance of a) permit to operate, b) permanent site closure is dependent on compliance with accepted plans and all applicable laws and regulations.

\*THERE IS A FINANCIAL PENALTY FOR NOT OBTAINING THESE INSPECTIONS

Contact Specialist:

*Note: see changes on page 4  
② The Health & safety plan must conform to 29CFR 1910.120*

UNDERGROUND TANK CLOSURE PLAN

\* \* \* Complete according to attached instructions \* \* \*

1. Business Name Val Strough Chevrolet  
Business Owner VSG&I of Oakland, Inc.
  2. Site Address 327-34th Street  
City Oakland, CA Zip 94609 Phone 5104506608
  3. Mailing Address PO Box 28886 Don Strough, 40 Cypress Coast Ford  
Hendricks 4 Greary, Seaside  
City Oakland, CA Zip 94604 Phone 5106584700
  4. Land Owner Strough Family Trust  
Address #4 Solary Plaza, Seaside City, State CA Zip 93955
  5. Generator name under which tank will be manifested VSG&I of Oakland, Inc.
- EPA I.D. No. under which tank will be manifested CAD981417512

6. Contractor Subsurface Environmental Corp.  
Address 11072 San Pablo Ave, Ste 315  
City El Cerrito, CA 94530 Phone 510 215 6553  
License Type\* A w/ Haz. Substances ID# 618766

\*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 N/A  
Address \_\_\_\_\_  
City \_\_\_\_\_ Phone \_\_\_\_\_

8. Contact Person for Investigation  
Name Roxanne Harris Title President  
Phone 510 215 6553

9. Number of tanks being closed under this plan 2  
Length of piping being removed under this plan 5'  
Total number of tanks at facility 2

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 ERICKSON, INC EPA I.D. No. CA D009466392  
Hauler License No. 019 License Exp. Date 5/93  
Address 255 Parr Blvd  
City Richmond State CA Zip 94801

b) Product/Residual Sludge/Rinsate Disposal Site

Name ROMIC Chemical EPA I.D. No. CA D009452657  
Address 2081 Bay Road  
City E. Palo Alto State CA Zip 94303

c) Tank and Piping Transporter

Name ERICKSON, Inc. EPA I.D. No. CAD009466392  
Hauler License No. 019 License Exp. Date 5/93  
Address 255 Parr Blvd.  
City Richmond State CA Zip 94801

d) Tank and Piping Disposal Site

Name ERICKSON, Inc EPA I.D. No. CAD009466392  
Address 255 Parr Blvd  
City Richmond State CA Zip 94801

11. Experienced Sample Collector

Name Roxanne Harris  
Company Subsurface Environmental Corp.  
Address 11072 San Pablo Ave., Ste 315  
City El Cerrito State CA Zip 94530 Phone 5102152553

12. Laboratory

Name McCampbell Analytical  
Address 110 2nd Ave. South D7  
City Pacheco State CA Zip 94553  
State Certification No. 1644

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

If yes, describe. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

14. Describe methods to be used for rendering tank inert

15 lbs dry ice (carbon dioxide) per  
1,000 gallon capacity

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)		
1000 BBLs 550 gals 1000 gals	Waste oil Gasoline  Both tanks have been used until recently. All contents will be pumped out approx. 2 weeks before removal.	soil soil water, if excavated	Beneath tank @ fill max 2' (1 sample) Beneath tank 1 sample @ each end. max 2'

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	
<b>Stockpiled Soil Volume (Estimated)</b> 15 yds (1000 gallon) 11 yds (550 gallon)	<b>Sampling Plan</b> <i>none at this time</i>

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
Waste Oil	TPH G (5030) TPH D (3530) Oil + Grease (3530) BTX+E (5030) LL HC (5030) LCAP (3050)	GC/FID (5030) GC/FID (3530) EPA (418.1) EPA (8020) EPA (8010) EPA (6010)	1.0 10.0 5.0 .005 5.0 VARIES: Cd .05 Cr .50 Pb .50 Zn .25 Ni .50
Unleaded Gasoline	TPH G (5030) BTX (5030)	GC/FID (5030) EPA (8020)	

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

18. Submit Worker's Compensation Certificate copy

Name of Insurer State Compensation Insurance Company

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) ROXANNE HARRIS

Signature [Handwritten Signature]

Date JANUARY 25, 1993

Signature of Site Owner or Operator

Name (please type) \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

Broadway

Property Line

Val Strough Building (not to scale)

Property Line

Sidewalk

550 W.O.T 

Driveway

  
1000 Gasoline Tank

34th Street



Subsurface  
Environmental Corp.  
Project #93124

Val Strough Company  
327 - 34th Street  
Oakland, California

Approximate Scale  
1" = 20'

**SITE HEALTH AND SAFETY PLAN  
FOR REMOVAL OF UNDERGROUND STORAGE TANKS**

**PREPARED FOR:**

**VAL STROUGH COMPANY  
327 - 34TH STREET  
OAKLAND, CALIFORNIA**

**SUBSURFACE ENVIRONMENTAL CORP.  
PROJECT NO. 93124**

**PREPARED BY:**

**SUBSURFACE ENVIRONMENTAL CORP.  
11072 SAN PABLO AVE., STE 315  
EL CERRITO, CALIFORNIA**



## **Introduction**

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### **Project Description**

The subject site is located at Val Strough Chevrolet 327 - 34th Street, Oakland, California. There are two underground storage tanks located underneath the sidewalk on the north side of the facility. One tank is a 550 gallon waste oil tank and the other is a 1,000 gallon gasoline tank. Both tanks have been recently emptied and are inactive at this time. This project involves removing the underground storage tanks and performing a soils investigation to determine whether or not an unauthorized leak has occurred.

### **Objective**

This Site Health and Safety Plan describes the policies and procedures that will be followed during the tank removal operation at Oakland.

### **Responsibilities**

#### Project Manager

The project manager for this job will be Mr. Howard Blair Jr. His duties include reading and becoming familiar with this Health and Safety Plan and SEC policies and procedures, overseeing all project activities, supervising site personnel and subcontractors, enforcing and ensuring all Health and Safety Plan regulations.

#### Health and Safety Officer

The Health and Safety Officer for this project will be Roxanne Harris. She will be the contact for the regulatory agencies and consult with the project manager on matters of safety and health. Her duties include but are not limited to developing and implementing this Health and Safety Plan, presenting tailgate safety meetings, maintaining logs and records, determining the level of personnel protective equipment, performing site inspections, ensuring that all onsite personnel and visitors have been given the proper training and determining potential safety hazards as the job progresses.

#### All Personnel, Subcontractors and Visitors

All personnel, subcontractors and visitors are responsible for understanding the Health and Safety Plan policies and procedures and for continuous adherence of the Health and Safety Plan and Federal, State and Local regulations.

Each person is responsible for their own health and safety, for completing tasks in a safe manner and for reporting any unsafe acts or conditions to his supervisor or SEC representatives.

#### Safety Meetings

Tailgate safety meetings will be held onsite before the start of work each day. Each employee will be informed of job tasks to be performed and the hazards associated with each task. They will be reminded of general safety rules and work practices. A review of the work performed the day before and any unsafe conditions will be discussed.

Each employee will be required to sign a form stating their understanding of site hazards.

## Hazard Analysis

### Waste Types

Gasoline  
Waste Oil

### Waste Characteristics

Toxic  
Flammable  
Volatile (Gasoline)

### Hazards of Concern

Explosion/Flammable  
Organic Chemicals

### Hazard Summary

Overall Hazard Evaluation: Low

Fire/Explosion Potential: Low

### Justification:

Gasoline and waste oil have already been emptied from the tanks. Carbon dioxide will be used to inert the tanks before removal and a LEL meter will be used to measure combustible vapors. Proper personnel protective equipment will be worn at all times.

### Other Hazards Associated with Tank Removal Projects

Operation of Heavy Equipment & Tools  
Lifting Heavy Objects  
Slipping or Falling Inside Excavations  
Unstable Ground  
Utility Lines  
Noise

## Monitoring

<u>Instrument</u>	<u>Task</u>	<u>Action Guidelines</u>	
Combustible Gas Indicator	Tank Removal	0 - 10%LEL	No explosion hazard
		10 - 25%LEL	Potential explosion hazard; take necessary precautions
		>25%	Explosion hazard; interrupt task & evacuate
		21.0%O <sub>2</sub>	Oxygen normal
		<21.0%O <sub>2</sub>	Oxygen deficient; take necessary precautions
		<19.5%O <sub>2</sub>	Interrupt task and evacuate

### **Decontamination Procedures**

*We will not be working with any contaminated materials at this jobsite.*

### **Confined Space Entry Procedures**

Confined space entry will not be necessary on this project.

### **Securing the Site**

It will be necessary to leave the excavations open while waiting for soils analysis. A fence and or steel plates will be installed over or around each excavation to prevent any entry into the hole.

### **Spill Containment/Emergency/Contingency Plans**

**Medical Emergency:** First aid or other appropriate immediate action will be administered then, if necessary, proceed to Summit Medical Center 350 Hawthorne Avenue, Oakland, CA. 24 Hour Emergency Room 510/420-6080.

**Fire/Explosion:** Contact Oakland Fire Department & Police Departments at 911. Fire extinguishers will be available onsite.

**Spills:** Area will be isolated from traffic. Spilled liquids will be contained with an absorbent material and placed into appropriate containers for disposal.



## BENZENE

Fire & Explosion Hazard: FLAMMABLE. Flashback along vapor trail may occur. Vapor may explode if ignited in an enclosed area. Vapor is heavier than air and may travel considerable distance to a source of ignition and flashback.

Protective Clothing: Avoid breathing vapors. Keep upwind. Wear protective boots, gloves, and goggles. Do not handle broken packages without protective equipment. Wash away any material which may have contacted the body with copious amounts of water or soap and water.

Health Hazards: Vapor is irritating to the eyes, nose and throat. If inhaled, will cause headaches, difficult breathing, or loss of consciousness. Liquid is irritating to skin and eye. Harmful if swallowed.

First Aid: If this chemical comes in contact with the eyes, immediately wash with water and get medical attention. If chemical comes in contact with the skin, immediately wash with soap and water. If a person breathes in large amounts of this chemical, move the exposed person to fresh air. If breathing has stopped perform artificial respiration. Keep the person warm and at rest. If the chemical has been swallowed, get medical attention immediately.

Warning Concentrations: (ppm or mg/m<sup>3</sup>): 4.68 ppm

Exposure Limits/ Guidelines:

OSHA PEL	1 ppm
NIOSH REL	Carcinogenic 0.1 ppm
ACGIH TLV-TWA:	10 ppm
IDLH	2,000 ppm

## TOLUENE

**Fire & Explosion Hazard:** FLAMMABLE. Flashback along vapor trail may occur. Vapor may explode if ignited in an enclosed area. Vapor is heavier than air and may travel considerable distance to a source of ignition and flashback.

**Protective Clothing:** Avoid breathing vapors. Keep upwind. Wear protective boots, gloves, and goggles. Do not handle broken packages without protective equipment. Wash away any material which may have contacted the body with copious amounts of water or soap and water.

**Health Hazards:** Vapor is irritating to the eyes, nose and throat. If inhaled, will cause nausea, vomiting, headaches, dizziness, difficult breathing, or loss of consciousness. Liquid is irritating to skin and eyes. If swallowed, will cause nausea, vomiting or loss of consciousness.

**First Aid:** If this chemical comes in contact with the eyes, immediately wash with water and get medical attention. If chemical comes in contact with the skin, immediately wash with soap and water. If a person breathes in large amounts of this chemical, move the exposed person to fresh air. If breathing has stopped perform artificial respiration. Keep the person warm and at rest. If the chemical has been swallowed, get medical attention immediately.

**Warning Concentrations:** (ppm or mg/m<sup>3</sup>): 0.17 ppm

### Exposure Limits/ Guidelines:

OSHA PEL	100 ppm
NIOSH REL	100 ppm
ACGIH TLV-TWA:	100 ppm
IDLH	2,000 ppm

## ETHYLBENZENE

**Fire & Explosion Hazard:** FLAMMABLE. Flashback along vapor trail may occur. Vapor may explode if ignited in an enclosed area. Vapor is heavier than air and may travel considerable distance to a source of ignition and flashback.

**Protective Clothing:** Avoid breathing vapors. Keep upwind. Wear protective boots, gloves, and goggles. Do not handle broken packages without protective equipment. Wash away any material which may have contacted the body with copious amounts of water or soap and water.

**Health Hazards:** Vapor is irritating to the eyes, nose and throat. If inhaled, will cause dizziness or difficult breathing. Liquid will burn skin and eyes. Harmful if swallowed.

**First Aid:** If this chemical comes in contact with the eyes, immediately wash with water and get medical attention. If chemical comes in contact with the skin, immediately wash with soap and water. If a person breathes in large amounts of this chemical, move the exposed person to fresh air. If breathing has stopped perform artificial respiration. Keep the person warm and at rest. If the chemical has been swallowed, get medical attention immediately.

**Warning Concentrations:** (ppm or mg/m<sup>3</sup>): N/A

**Exposure Limits/ Guidelines:**

OSHA PEL	100 ppm
NIOSH REL	100 ppm
ACGIH TLV-TWA:	N/A
IDLH	2,000 ppm

## XYLENE ISOMERS

**Fire & Explosion Hazard:** Flammable/combustible material. May be ignited by heat, sparks or flames. Vapors may travel to a source of ignition and flash back. Container may explode in heat of fire. Vapor explosion hazard indoors, outdoors or in sewers. Runoff to sewer may create fire or explosion hazard.

**Protective Clothing:** Avoid breathing vapors. Keep upwind. Wear protective boots, gloves, and goggles. Do not handle broken packages without protective equipment. Wash away any material which may have contacted the body with copious amounts of water or soap and water.

**Health Hazards:** May be poisonous if inhaled or absorbed through skin. Vapors may cause dizziness or suffocation. Contact may irritate or burn skin or eyes. Fire may produce irritating or poisonous gases. Runoff from fire control or dilution water may cause pollution.

**First Aid:** If this chemical comes in contact with the eyes, immediately wash with water and get medical attention. If chemical comes in contact with the skin, immediately wash with soap and water. If a person breathes in large amounts of this chemical, move the exposed person to fresh air. If breathing has stopped perform artificial respiration. Keep the person warm and at rest. If the chemical has been swallowed, get medical attention immediately.

**Warning Concentrations:** (ppm or mg/m<sup>3</sup>): No information available.

**Exposure Limits/ Guidelines:**

OSHA PEL  
NIOSH REL  
ACGIH TLV-TWA:  
IDLH

# ACCIDENT PREVENTION PROGRAM

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*Subsurface Environmental Corp.*

It is the policy of Subsurface Environmental Corp. to provide a safe and healthful environment for all of its employees. We consider no phase of operations or administration to be of greater importance than injury or illness prevention. Safety takes precedence over expediency or shortcuts. At Subsurface Environmental we believe every accident and every injury is preventable. We will take every step possible to reduce the possibility of injury, illness or accident.

This document establishes the general safety requirements for all of Subsurface Environmental Corporation's activities and operations. Each employee shall be provided with initial indoctrination and such continuing instruction as will enable him or her to conduct their work in a safe manner.

All employees shall follow the general work rules and safety regulations, render every possible aid to safe operations and report all unsafe conditions or practices to their supervisor or foreman.

## Supervisors

Supervisors shall demonstrate interest in safety by establishing a firm and positive accident prevention policy that include supplying or tangible items like hard hats, protective clothing, safety glasses, good ladders, first aid materials, and safety devices on equipment.

Require foreman to give individual safety instructions and orders as needed to workers and those found to be working unsafely.

Require foreman to hold tailgate safety meetings with their crews at least every ten working days to emphasize some particular safety topic that needs special attention.

Arrange for frequent and regular field safety inspections. This should be done concurrent with regular jobsite visits.

Require all field personnel to make accident prevention and hazard control an important part of their job responsibility.

## Emergency Telephone Numbers

Emergency telephone numbers and directions to the nearest hospital or urgent care facility shall be posted at the jobsite.

## First Aid Kits

Each project must have an adequate first aid kit available at the jobsite. Supervisors must inspect first aid kits and replace those items that have been depleted or purchase a new kit as required.

## Construction Safety Orders

Each jobsite office and superintendent should have a current copy of the "Construction Safety Orders". This should be used as a handbook and guide for safety practices required for different types of work. We encourage foreman to become familiar with this material. For advice and assistance check with your

supervisor, project manager or general superintendent at the main office.

#### First Year Apprentices, Trainees, and New Hires

It is the policy of the company to take extra precautions with first year apprentices, trainees, and new hires. It will be the foreman and superintendent's responsibility to individually review with such persons the safety requirements for each different work assignment that he gives to them. the foreman shall periodically check to see that such persons fully understands all the standard safety precautions pertaining to that assignment and see that they are followed. It is apparent that the inexperienced craftsman is the most susceptible to injury and it is the foreman's job to prevent accidents involving these employees.

#### Reporting Injuries and Accidents

Each occupational injury or illness shall be reported immediately to the first aid attendant and to your foreman to assure suitable first aid or medical attention.

All accidents involving damage to equipment or materials, including motor vehicle accidents shall be reported to your foreman or supervisor at once.

#### Reporting Unsafe or Hazardous Conditions

Report unsafe or hazardous conditions to your foreman or supervisor so that corrective action can be taken to avoid accidents.

#### Tailgate Safety Meetings

A minimum of one 5 minute tailgate or tool box safety meeting shall be conducted at at least every 10 days. All personnel shall attend the safety meeting prior to beginning work onsite and will sign a form stating that their understanding of site hazards.

# GENERAL WORK PRACTICES AND SAFETY RULES

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*Subsurface Environmental Corp.*

## Good Housekeeping

Good housekeeping on the job is mandatory and every employee must do his part daily in this activity to keep the job clean for safety.

Walkways shall be kept clear of obstructions at all times.

Tools and equipment not in use shall be stored in a designated area.

## Drunkenness and Use of Narcotics

Drinking intoxicants of the job is strictly forbidden. Anyone who reports for duty under the influence of alcohol or narcotics shall not be permitted to work, shall be removed from the jobsite and subject to termination.

## Sanitation

Employees shall thoroughly wash face and hands upon finishing work and prior to eating and drinking.

## Horseplay or Fighting

Indulgence in practical jokes, horseplay, scuffling, wrestling or fighting is strictly prohibited.

## Personal Protective Equipment

Hard hats and work boots will be worn at all times. When necessary, ear plugs, safety glasses, toe guards, safety belts, respiratory equipment, gloves and tyvek or polypropylene suits shall be worn.

## Noise

Hearing protection shall be required when noise exposure is 85 dBA or more. Noise levels above 90 dBA are potentially damaging.

<u>Sound Level DBA</u>	<u>Time Allowed Per Day</u>
90	8
95	4
100	2
105	1
110	1/4

## Lifting

When lifting, take position over the load and lift with leg muscles not back muscles. Get help for heavy or awkward loads.

### Starting and Operating Machines

Employees shall not start or operate any mechanical equipment unless qualified and authorized to do so.

### Compressors. Portable Compressors

Compressors on wheels must be prevented from rolling.

Safety valves must be popped weekly and tank must be drained daily.

### Hand Tools

Worn or broken hand tools shall be turned in for repair or replacement. A dull or broken tool is unsafe.

Hand tools shall be used for their intended purpose only.

### Power Tools

Electrically powered tools and equipment shall be grounded when in use.

Air hose connections shall be secured to prevent accidental separation.

Operating switches or levers requiring constant pressure for operation shall not be tampered with to make the tool operate without constant hand or finger pressure.

Grinding wheel speeds shall conform to the manufacturer's recommended speeds.

### Explosive Actuated Tools

Only authorized and properly trained employees may use explosive actuated tools. All such tools shall be used in accordance with the manufacture's instructions.

Safety goggles shall be worn by the operator and shall be an approved type.

Ear plugs shall be worn when using a jack hammering or similar type equipment.

### Electrical Extension Cords

Only approved types of extension cords may be used and they shall be properly grounded. Damaged or inoperative cords shall be immediately turned in for repair or replacement.

### Temporary Electric Power

All temporary power lines shall be handled as if they were energized.

### Welding Cable

Welding cable shall be connected or spliced in an approved manner. There shall be no exposed metal parts in any splice.

### Ladders

Only approved ladders shall be used. Job-made ladders shall be substantially constructed in accordance with an approved design. Portable straight or extension ladders shall be placed at a safe angle and shall be secured to prevent displacement.



Top of ladder giving access to a work area or platform shall extend at least 36" above that level.

Do not stand on top four rungs of rung ladders without hand holds unless protected by a safety belt.

Do not use metal ladders within four feet of exposed electrical parts.

Two ways to determine the safe pitch of a ladder are: locate ladder at a 5.5 degree angle to the ground or place base of the ladder/4 length of distance from point where ladder touches vertical plane.

#### Excavations or Trenches

All excavation and tank removal procedures will comply with OSHA regulations.

Excavations in unstable or safe material 5 feet or more in depth shall be shored or sloped in an approved manner.

Excavations in hard compact material shall be shored or otherwise protected when 5 feet or more in depth and 8 feet or more in length.

Sloped angles fro different materials:

- Compacted angular gravels: 1/2 to 1
- Average soils: 1 to 1
- Compacted sharp sand: 1 1/2 to 1
- Well rounded loose sand: 2 to 1

Excavated soils will be stored at a minimum of two feet form the edge of any excavation.

There shall be ladders in each trench 3 feet deep or more where employees are working to provide safe exits from the trench. There shall be no more that 25 feet of lateral travel distance to the nearest ladder.

Excavations and trenches shall be inspected daily by a competent person. If there is evidence of slides or cave-ins, all work in the exposed area shall cease until necessary precautions have been taken for the protection of employees.

#### Floor Openings, Holes and Edges

Floor openings or holes shall be protected by approved guard tails or covers. If covers are used they shall be strong enough to support the loads to be imposed upon them and shall be secured to prevent accidental displacement.

The open edges of all floors six feet or more above the next floor level shall be guarded by an approved barricade secured to prevent accidental displacement.

#### Gas Cylinders

Gas cylinders must be upright when in use, secured to prevent falling, and protected from extreme heat and from being struck by moving equipment and falling objects.

If transported by crane, hoist or derrick, gas cylinders must be handled in a suitable cradle, net or skip box, never by wire or rope, web or chain sling, or by dragging. Regulators shall be removed.

Oxygen cylinders must never be stored near highly combustibile materials, especially oil and grease, or near fuel gas cylinders.

Caps should be placed on cylinders that are empty and such cylinders shall be marked "empty".

#### Explosion and Gas Hazard - Confined Spaces

No work involving a source of ignition shall be attempted near any pit, manhole, open sewer, drain vent, pipe trench, or any enclosed space where there is reason to believe that flammable vapors may be present until a test has been made within approved hydrocarbon vapor detector, and when said test indicated the atmosphere is safe for hot work.

At locations similar to the ones above where there is reason to believe that toxic gas may be present, a similar test with an approved toxic gas detector shall be made and no work shall be performed in the location until said test indicates toxic gas concentrations lower than the maximum permissible for that gas or until approved protective measures have been taken.

In areas where flammable or toxic vapors or gasses may occur, all the work shall be done in accordance with Hazardous Area Work Procedures.

#### Fire Prevention and Control

Each employee shall comply with the Fire Prevention and Control Procedures. There shall be no unauthorized open fires.

#### Fueling Equipment

No gasoline or diesel engine shall be fueled while it is running. If fuel cans are used for refueling, they shall be approved metal safety fuel cans with a flash arresting screen, spring closing lid and spout cover that will safely relieve internal pressure if the can is exposed to fire.

There shall be no smoking or open flames within 25 feet of fuel storage tanks, fuel pumps or refueling operation.

All fuel storage tanks shall be properly grounded in an approved manner. Electrical grounds shall not be removed without authorization.

#### Vehicle Operation

Each vehicle driver and operator of rubber tired construction equipment shall comply with job speed limits and traffic control procedures.

No vehicle with an obstructed rear view shall be backed up unless it is equipped with an operating back-up alarm signal that is audible above the surrounding noise or when an observer signals that it is safe to do so.

No employee may be transported in a vehicle unless approved seating is available to him.

#### Crane Operation

The project superintendent or someone officially delegated by him shall review the specific operation of the crane when the crane must operate in the vicinity of an overhead power line where any part of the crane can come within 10 feet of the overhead line. This must be done prior to the crane moving into the exposed area.

The project superintendent or someone officially delegated by him shall review the specific operation of a crane prior to any lift that exceeds 80% of the rated capacity for the radius of boom. The review shall be

documented in accordance with procedures established with the company.  
Outriggers shall be used at all times, except when traveling.

Hand signals to crane and derrick operators shall be those prescribed by the applicable American National Standard Institute standard for the type of crane in use. An illustration of the signals shall be posted at the job site.

Overhead lines within the work area shall be marked with warning signs, 6 to 8 feet above the ground.

Rigging and boom changes shall be made by a competent mechanic under the supervision of a qualified supervisor.