

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
07-20-06

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

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

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

Subject: Fuel Leak Case No. RO0000134, Val Strough Chevrolet, 327-34th 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

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.

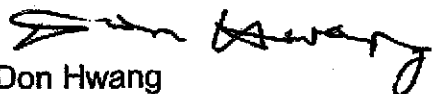
TECHNICAL REPORT REQUEST

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

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

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 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, 327-34th St.,
Oakland, CA

Alameda County Environmental Health staff has reviewed "Technical Response to the August 20, 2004 Alameda County Health Care 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, 4th 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 - 2nd Quarter 2005 Groundwater Monitoring Report, DPE Interim Remedial Action Report
October 31, 2005 -Work Plan; 3rd Quarter 2005 Groundwater Monitoring Report; DPE Interim Remedial Action Report
January 31, 2006 - 4th Quarter 2005 Groundwater Monitoring Report, DPE Interim Remedial Action Report

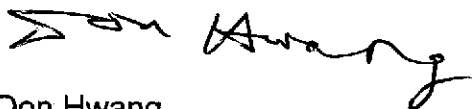
These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SCWT
8-23-04

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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, 327-34th 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

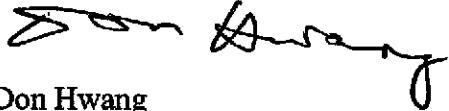
Please submit the following technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

- October 31, 2004 -Work Plan; 3rd Quarter 2004 Groundwater Monitoring Report; *DPE* Interim Remedial Action Report
60 days after Work Plan approval - Soil and Water Investigation Report
January 31, 2005 - 4th 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 – 2nd 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,



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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



07-16-03
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, 327-34th 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

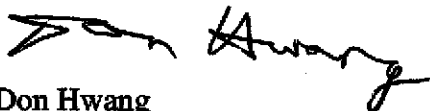
Please submit the following technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

Mr. Strough
July 15, 2003
Page 3 of 3

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



03-01-01

20134

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, 327-34th St., Oakland, CA 94609;
Std 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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SM 3-13-2000
inld cc's

20134

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, 327-34th 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, CO₂, 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



Sent 11-9-99
Including cc's

R0134

November 08, 1999

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

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

STID: 3035

Re: Investigations at Val Strough Chevrolet, located at 327 34th 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.

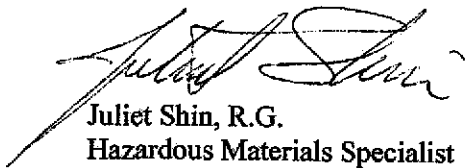
Lastly, per my conversation with Jeriann Alexander, Subsurface Consultants, Inc., on November 08, 1999, the site has received pre-approval from the State UST Cleanup Fund for continued quarterly groundwater monitoring and monthly free product removal. The next quarterly

Don Strough
Re: 327 34th 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

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO#134

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,

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

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0134

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

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0134

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

vstrochv.3

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0134

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

Stid 3035

April 30, 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: 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.

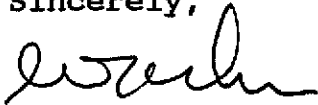
Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB. Copies of all proposals and reports must also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

vstrochev

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



✓ R0134 (Val Strough chev)
R0500 (3701 Broadway)

Certified Mailer # P 062 127 754

January 18, 1991

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

Val Strough Honda
Val Strough Chevrolet
c/o Mr. W. Bruce Bercovich
Kay & Merkle
100 The Embarcadero, 3rd Floor
San Francisco, CA 94105

RE: Potential contamination from former underground fuel storage tanks at 3737 Broadway, Oakland

Gentlemen:

As you may be aware, a Chevron gas station formerly occupied the property at 3701 Broadway, at the corner of Broadway and MacArthur. Samples of groundwater from the northern edge of this property indicate the possibility that hydrocarbons have migrated from the 3737 Broadway property onto the 3701 Broadway site. Information on file suggests that three underground tanks were removed from this location in early 1987, with incomplete soil sample results and documentation on file.

Under Sec. 13304(a) of the Porter-Cologne Water Quality Control Act (California Water Code), a responsible party is defined as any person who "has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into waters of the state and creates, or threatens to create, a condition of pollution or nuisance..." This section goes on to state that this person must "clean up such waste or abate the effects thereof..." Thus, an underground tank system that in the past resulted in unauthorized releases confers liability on the following parties:

- 1) The property owner at the time of the release(s) and thereafter for as long as the releases threaten groundwater;
- 2) The property lessor (as distinguished from facility operator) at the time of release and thereafter for as long as the releases threaten groundwater; and
- 3) The facility operator (or sublessor) at the time of release.

The actual releases from the tanks are presumed to have occurred until February 1987, when they were removed; however, there is evidence that threats to groundwater from the former location of

✓ R0134
R0500

Val Strough Honda
Val Strough Chevrolet
c/o Mr. W. Bruce Bercovich
January 18, 1991
Page 2 of 2

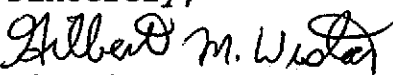
these tanks still remain. This is because the monitoring wells next door at 3701 Broadway that are upgradient of the tanks removed from that property, but downgradient of the former tank area on 3737 Broadway, show significant groundwater contamination.

Therefore, we are requiring that a work plan be submitted to this office, which is designed to determine whether the old underground tanks at 3737 Broadway are contributing to the hydrocarbon plume beneath the former Chevron station, and if so, to what extent. This work plan is to be submitted to this office for approval, and is due February 22, 1991 no later than 5 p.m.

A suitably qualified environmental consultant must handle this investigative work. We are currently requiring Chevron to define the limits of and remediate contaminated groundwater underneath 3701 Broadway, and county oversight on this issue will continue until full cleanup occurs. However, you will be responsible for subsurface contamination (if any) originating from 3737 Broadway. In addition, we require that a deposit of \$425 be submitted to this office, made out to Alameda County, to cover our costs for report review and remedial oversight of the case. This deposit is due by February 22.

This letter constitutes a formal request for technical reports according to Sec. 13267 of the California Water Code, as well as Sec. 25299.36 of the California Health and Safety Code. Copies of all documentation sent here should also be sent to the Regional Water Quality Control Board in Oakland (attn: Lester Feldman). Failure to respond in a timely manner could result in civil liabilities under the Water Code of up to \$1,000 per day. Other violations of California law, such as Sec. 25299.37 of the California Health and Safety Code, may also be cited.

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

Sincerely,

Gil Wistar
Hazardous Materials Specialist

cc: Lisa Marinaro, Chevron USA (P.O. Box 5004, San Ramon, CA 94583)
Lester Feldman, RWQCB
Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection Division
Rafat A. Shahid, Asst. Agency Director, Environmental Health files



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0134

September 19, 1990

Vern Richards
Val Strough Chevrolet
327 - 34th St.
Oakland, CA 94611

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

Re: Waste Minimization Assessment

Dear Vern Richards:

Your business has been selected to receive a hazardous waste minimization assessment. As you are probably aware, hazardous waste reduction has become a statewide, if not a national, issue. To address this issue at a county level, Alameda County is establishing its own Hazardous Waste Minimization Program and is planning to conduct waste minimization assessments for all hazardous waste generating facilities in the County.

We have chosen businesses in the auto repair industry to receive the first round of waste minimization assessments. It is our hope that these assessments will assist participating businesses in minimizing their hazardous wastes - and will give us further information on the best way to structure our minimization program.

One of our Hazardous Materials Specialists will be contacting you during the week of September 24 to arrange a meeting with you for an assessment of your business. During this meeting and assessment, the Specialist will work with you in examining your business's hazardous waste generating practices. The Specialist will then provide you with materials on waste reduction technology and assist you in setting up appropriate hazardous waste minimization practices.

We look forward to working with you in reducing the amount of hazardous waste your business generates. Of course, your comments and suggestions are encouraged; we need your input in order to best serve you! Please direct any comments and questions to Katherine Chesick at 415/271-4320.

Sincerely,

A handwritten signature in cursive script that reads "Edgar B. Howell".

Edgar B. Howell, Chief,
Alameda County Hazardous Materials Division

EBH:kac

cc: Fire Department
Files