

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT  
10-7-04

ENVIRONMENTAL HEALTH SERVICES

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

October 6, 2004

Bond CC Oakland, LLC  
c/o 350 W. Hubbard Street, Suite 450  
Chicago, Illinois 60610  
Attention: Mr. Robert Bond

Kestrel Partners, LLC  
c/o 4457 Willow Road, Suite 102  
Pleasanton, California 94588  
Attention: Mr. Arnold E. Brown

230 Bay Place, LP.  
c/o 400 Race Street, Suite 200  
San Jose, CA 95126  
Attention: Mr. Stephen W. Wilson

The Greater Bay Trust Company  
c/o Hanson, Bridgett, Marcus, Vlahos, Rudy, LLP  
333 Market Street, Suite 2300  
San Francisco, California 94105  
Attention: Rory Campbell, Esq.  
Trustee for the Robert Shepard Trust, Brian F. Shepard Trust, Douglas C. Shepard Trust, and the Lisa C. Shepard Trust

Dear Messrs. Bond, Brown, Wilson, & Campbell:

Subject: Fuel Leak Case No. RO0000148, Cox Cadillac, 230 Bay Place, Oakland, CA

Alameda County Environmental Health (ACEH) staff reviewed "Response to Alameda County Health Care Services Agency Comments to LFR Letter dated September 15, 2004," dated October 1, 2004, prepared by LFR Levine-Fricke (LFR). Soil and Groundwater Cleanup Levels and Cleanup Goals for the additional chemicals of concern have been provided and are acceptable. Thus, your proposed interim remediation work plan is approved. We request that you address the following comments, perform the proposed interim remediation work, and send us the technical reports requested below.

#### OTHER COMMENTS

1) Interim Remediation Completion Report submittal due date – Instead of proposing an alternative to the deadline date of December 1, 2004, LFR suggests establishing a submittal date after remedial activities have commenced. Until a different deadline is established, we will consider the existing date of December 1, 2004 as the deadline date.

2) Notification prior to start of field work – 48 hrs.

#### 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 – 2<sup>nd</sup> Quarter 2004 Groundwater Monitoring Report
- October 31, 2004 - 3<sup>rd</sup> Quarter 2004 Groundwater Monitoring Report
- December 1, 2004 – Interim Remediation Completion Report
- January 31, 2005 - 4<sup>th</sup> Quarter 2004 Groundwater Monitoring Report
- April 30, 2005 - 1st Quarter 2005 Groundwater Monitoring Report
- July 31, 2005 – 2<sup>nd</sup> Quarter 2005 Groundwater Monitoring Report

If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Charles Pardini, Kimberly Brandt, Levine-Fricke, 1900 Powell St., 12<sup>th</sup> Floor,  
Emeryville, CA 94608-1827  
Donna Drogos  
File

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**

AGENCY  
DAVID J. KEARS, Agency Director



SO  
9-22-04

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

September 21, 2004

Bond CC Oakland, LLC  
c/o 350 W. Hubbard Street, Suite 450  
Chicago, Illinois 60610  
Attention: Mr. Robert Bond

Kestrel Partners, LLC  
c/o 4457 Willow Road, Suite 102  
Pleasanton, California 94588  
Attention: Mr. Arnold E. Brown

230 Bay Place, LP.  
c/o 400 Race Street, Suite 200  
San Jose, CA 95126  
Attention: Mr. Stephen W. Wilson

The Greater Bay Trust Company  
c/o Hanson, Bridgett, Marcus, Vlahos, Rudy, LLP  
333 Market Street, Suite 2300  
San Francisco, California 94105  
Attention: Rory Campbell, Esq.  
Trustee for the Robert Shepard Trust, Brian F. Shepard Trust, Douglas C. Shepard  
Trust, and the Lisa C. Shepard Trust

Dear Messrs. Bond, Brown, Wilson, & Campbell:

Subject: Fuel Leak Case No. RO0000148, Cox Cadillac, 230 Bay Place, Oakland,  
CA

Alameda County Environmental Health (ACEH) staff reviewed "Response to Alameda County Health Care Services Agency Comments to Revised Corrective Action Plan", dated September 15, 2004, prepared by LFR Levine-Fricke (LFR), to determine if the information requested for the remediation proposal of excavating contaminated soil as interim remediation was satisfied. We request that you address the following technical comments, perform the proposed interim remediation work, and send us the technical reports requested below.

**TECHNICAL COMMENTS**

1) Excavation Cleanup Levels and Cleanup Goals. The Revised Soil and Groundwater Cleanup levels and Cleanup Goals for the chemicals of concern provided are

acceptable. However, the list of the chemicals of concern is incomplete. Omitted were: EDC, MTBE, TAME, ETBE, DIPE, and TBA. Please submit appropriate cleanup levels; and cleanup goals for these chemicals of concern.

2) Geologic Cross-Sections - Please include and show soil and groundwater analytical results, utility conduits, well screens, etc. in revision of LFR report entitled "Results of the March and April 2004 Soil and Groundwater Investigation at the Former Cox Cadillac Property," dated August 4, 2004.

#### OTHER COMMENTS

3) Interim Remediation Completion report submittal due date - ACEH staff has requested that an Interim Remediation Completion report be submitted by December 1, 2004. LFR requests that this date be changed to "60 days following completion of the Interim Remediation activities," as described in the RCAP. ACEH would like justification for an extension of the deadline and an alternative date.

4) Professional Certification - The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

5) Perjury Statement - Please note, all work plans and technical reports submitted to this office 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 proposal 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. A review of our case file indicates that none of your reports contain a perjury statement. We request that perjury statements be submitted with all future reports for this site.

#### TECHNICAL REPORT REQUEST

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

- October 1, 2004 – Addendum (Interim Remediation)
- October 1, 2004 – 2<sup>nd</sup> Quarter 2004 Groundwater Monitoring Report

Messrs. Bond, Brown, Wilson, & Campbell

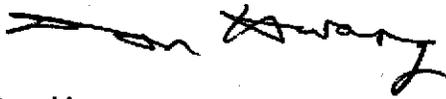
September 21, 2004

Page 3 of 3

- October 31, 2004 - 3<sup>rd</sup> Quarter 2004 Groundwater Monitoring Report
- December 1, 2004 – Interim Remediation Completion Report
- January 31, 2005 - 4<sup>th</sup> Quarter 2004 Groundwater Monitoring Report
- April 30, 2005 - 1st Quarter 2005 Groundwater Monitoring Report
- July 31, 2005 – 2<sup>nd</sup> Quarter 2005 Groundwater Monitoring Report

If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang

Hazardous Materials Specialist  
Local Oversight Program

C: Charles Pardini, Kimberly Brandt, Levine-Fricke, 1900 Powell St., 12<sup>th</sup> Floor,  
Emeryville, CA 94608-1827  
Donna Drogos  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
11-30-04

November 30, 2004

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

Bond CC Oakland, LLC  
c/o 350 W. Hubbard Street, Suite 450  
Chicago, Illinois 60610  
Attention: Mr. Robert Bond

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c/o 4457 Willow Road, Suite 102  
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Attention: Mr. Stephen W. Wilson

The Greater Bay Trust Company  
c/o Hanson, Bridgett, Marcus, Vlahos, Rudy, LLP  
333 Market Street, Suite 2300  
San Francisco, California 94105  
Attention: Rory Campbell, Esq.  
Trustee for the Robert Shepard Trust, Brian F. Shepard Trust, Douglas C. Shepard Trust, and the Lisa C. Shepard Trust

Dear Messrs. Bond, Brown, Wilson, & Campbell:

Subject: Fuel Leak Case No. RO0000148, Cox Cadillac, 230 Bay Place, Oakland, CA

Alameda County Environmental Health (ACEH) staff reviewed "Work Plan to Conduct Additional Soil and Grab Groundwater Sampling" dated October 28, 2004, and "Request that Alameda County Health Care Services Agency Require the Greater Bay Trust Company to Conduct Periodic Groundwater Monitoring Activities" dated November 10, 2004, both prepared by LFR Levine-Fricke (LFR). We generally concur with the work plan which proposes to install borings near the former underground storage tanks and the underground utilities. We request that you address the following comments, perform the proposed work, and send us the technical reports requested below.

#### TECHNICAL COMMENTS

- 1) Soil samples from borings - Sample at changes of lithology, at the soil/groundwater interface, and at areas of obvious contamination. Please include in the Soil and Water Investigation Report.
- 2) Monitoring well screens - The proposed temporary monitoring wells indicate screened intervals of 10 feet in length. We request that your monitoring network be depth discrete, generally, screened intervals of 3 to 5 feet in length.
- 3) Additional soil or groundwater sampling in the utility corridor(s) - If the analytical results for soil and/or groundwater samples collected from either borings A or B are greater than the cleanup criteria for petroleum hydrocarbons and associated compounds, then additional borings will be required to further delineate the soil and/or groundwater contamination. Please include in the Soil and Water Investigation Report.
- 4) Geologic Cross-Sections - Please include and show soil and groundwater analytical results, utility conduits, well screens, etc. in revision of LFR report entitled "Results of the March and April 2004 Soil and Groundwater Investigation at the Former Cox Cadillac Property," dated August 4, 2004. Please include in the Soil and Water Investigation Report.

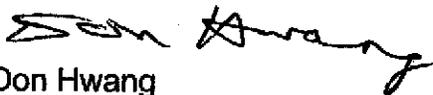
#### TECHNICAL REPORT REQUEST

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

- December 1, 2004 - 2<sup>nd</sup> Quarter 2004 Groundwater Monitoring Report, 3<sup>rd</sup> Quarter 2004 Groundwater Monitoring Report, Interim Remediation Completion Report
- January 31, 2005 - Soil and Water Investigation Report, 4<sup>th</sup> Quarter 2004 Groundwater Monitoring Report
- April 30, 2005 - 1st Quarter 2005 Groundwater Monitoring Report
- July 31, 2005 - 2<sup>nd</sup> Quarter 2005 Groundwater Monitoring Report

If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang

Hazardous Materials Specialist  
Local Oversight Program

C: Charles Pardini, Kimberly Brandt, Levine-Fricke, 1900 Powell St., 12<sup>th</sup> Floor,  
Emeryville, CA 94608-1827  
Donna Drogos  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
9-1-04

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

August 31, 2004

Mr. Rob Bond  
Bond Companies  
350 W. Hubbard Street, Suite 4560  
Chicago, Illinois 60610

Mr. Bill Cox  
Bill Cox Cadillac & Buick  
C/o 100 Pine St., Suite 2100  
San Francisco, CA 94163

The Greater Bay Trust Company  
c/o Lance Shoemaker, Esq.  
Trustee for the Robert Shepard Trust, Brian F. Shepard Trust, Douglas C. Shepard Trust, and the Lisa C. Shepard Trust  
Hanson, Bridgett, Marcus, Vlahos, Rudy, LLP.  
333 Market Street, Suite 2300  
San Francisco, California 94105  
Dear Messrs. Bond, Cox, & Shoemaker:

Subject: Fuel Leak Case No. RO0000148, Cox Cadillac, 230 Bay Place, Oakland, CA

Alameda County Environmental Health (ACEH) staff has recently reviewed "Revised Corrective Action Plan" dated June 25, 2004, prepared by Levine Fricke. We found the proposed CAP to be incomplete and are unable to concur with the proposed CAP. A CAP at this time is premature, as additional investigation is needed at this site. However, we generally concur with the remediation proposal in the CAP of excavating contaminated soil as interim remediation. We request that you address the following technical comments, perform the proposed interim remediation work, and send us the technical reports requested below.

**TECHNICAL COMMENTS**

- 1) **Excavation Cleanup Levels and Cleanup Goals** - We concur with implementation of the excavation activities proposed in the CAP, dated June 25, 2004, prepared by Levine Fricke, as an interim remedial action. However, the remediation proposal does not include excavation cleanup levels and cleanup goals in accordance with the San Francisco Regional Water Quality Control Board Basin Plan and appropriate ESL guidance for all COCs and for the appropriate groundwater designation. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with San Francisco Regional Water Quality Control Board Basin Plan. Please submit appropriate cleanup levels; and cleanup goals in accordance with 23 CCR Section 2725, 2726, and 2727 as an Addendum (Interim Remediation) by the date specified below.
- 2) **ORC Placement in Excavation** - Please specify the design parameters for your ORC treatment and indicate how long the ORC is expected to be effective in treating contamination.

**REQUEST FOR ADDITIONAL INFORMATION**

- 1) **Missing Reports** - ACEH's case file appears to be missing numerous reports, particularly for work implemented without regulatory oversight from our office. We cannot complete our review of your site without these reports. ACEH's case file for the subject site contains the technical reports listed below. You are requested to submit copies of any other reports you may have documenting additional investigation activities or other work related to the UST system and/or your site by September 15, 2004.

Eisenberg, Olivieri, & Associates (EOA). April 1994. Final Report of UST Closure Activities  
EOA. September 1994. Report of Soil Excavation and Disposal (sic) Activities  
EOA. January 30, 1995. Well Conversion and First Quarterly Monitoring Report  
EOA. April 21, 1995. 2nd Quarter Monitoring Report  
EOA. July 25, 1995. 3<sup>rd</sup> Quarter Monitoring Report  
EOA. August 25, 1995. "Offsite Groundwater "Hydropunch" Sampling Report  
EOA. November 7, 1995. 4<sup>th</sup> Quarter Monitoring Report  
EOA. January 1996. Annual Monitoring Report  
EOA. April 1, 1996. Corrective Action Plan Development Report  
EOA. April 5, 1996. February 1996 Monitoring Report  
EOA. July 25, 1996. Corrective Action Plan, Phase II  
EOA. September 1996. Corrective Action Plan Conceptual Remedial Design  
ETIC. November 11, 2003. 3<sup>rd</sup> Quarter 2003 Groundwater Monitoring Report  
ETIC. January 23, 2004. Supplemental Site Investigation Report  
ETIC. March 17, 2004. 1st Quarter 2004 Groundwater Monitoring Report  
Levine-Fricke (LFR). June 4, 2004. Revised Corrective Action Plan  
LFR. June 17, 2004. Addendum to Revised Corrective Action Plan  
LFR. August 4, 2004. Results of the March and April 2004 Soil and Groundwater Investigation  
PES Environmental (PES). November 13, 1992. Underground Mineral Spirits, Tank Closure Report  
PES. February 4, 1993. Workplan Subsurface Environmental Investigation  
PES. December 23, 1993. Report, Soil and Groundwater Investigation  
PES. September 12, 1995. "Offsite Groundwater "Hydropunch" Sampling Report  
PES. April 18, 1996. Workplan Potential Source Investigation  
PES. October 31, 1996. Revised Interim Remedial Action Plan Soil Excavation and Passive In-situ Bioremediation  
PES. November 26, 1996. Addendum Revised Interim Remedial Action Plan Soil Excavation and Passive In-situ Bioremediation  
PES. December 13, 1996. Letter CA. Letter Underground Storage Tank Cleanup Fund Cost Pre-Approval Request Interim Remedial Actions  
PES. September 30, 1999. Report, Site Characterization and Interim Remedial Actions  
PES. October 29, 1999. Quarterly Groundwater Monitoring Report and Remediation Progress Report  
April 1999 Quarterly Event  
PES. January 11, 2000. Quarterly Groundwater Monitoring Report and Remediation Progress Report  
July 1999 Quarterly Event  
PES. April 21, 2000. Quarterly Groundwater Monitoring Report and Remediation Progress Report  
October 1999 Quarterly Event  
PES. May 24, 2000. Quarterly Groundwater Monitoring and Year-End Bioremediation Evaluation Report

PES. July 16, 2001. Quarterly Groundwater Monitoring Report April 2001 Quarterly Event  
PES. August 29, 2001. Workplan Monitoring Well Installation, Resumption of Enhanced Bioremediation, and Resumption of Quarterly Sampling  
PES. September 10, 2001. Quarterly Groundwater Monitoring Report July 2001 Quarterly Event  
PES. December 17, 2001. Addendum to Workplan Monitoring Well Installation, Resumption of Enhanced Bioremediation, and Resumption of Quarterly Sampling  
PES. April 25, 2002. Quarterly Groundwater Monitoring November 2001 Quarterly Event  
PES. September 25, 2002. Quarterly Monitoring Report 1<sup>st</sup> Quarter 2002  
PES. September 25, 2002. Quarterly Monitoring Report 2<sup>nd</sup> Quarter 2002  
PES. September 25, 2002. Quarterly Monitoring Report 3<sup>rd</sup> Quarter 2002  
PES. January 24, 2003. Workplan Supplemental Site Investigation  
PES. January 31, 2003. Quarterly Monitoring Report 4<sup>th</sup> Quarter 2002  
PES. March 21, 2003. Quarterly Monitoring Report 1<sup>st</sup> Quarter 2003  
PES. May 21, 2003. Addendum to Supplemental Site Investigation

#### **TECHNICAL REPORT REQUEST**

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

- September 15, 2004 – Addendum (Interim Remediation), missing reports, and Machado requirements
- September 15, 2004 – 2<sup>nd</sup> Quarter 2004 Groundwater Monitoring Report
- October 31, 2004 - 3<sup>rd</sup> Quarter 2004 Groundwater Monitoring Report
- December 1, 2004 – Interim Remediation Completion Report
- January 31, 2005 - 4<sup>th</sup> Quarter 2004 Groundwater Monitoring Report
- April 30, 2005 - 1st Quarter 2005 Groundwater Monitoring Report
- July 31, 2005 – 2<sup>nd</sup> Quarter 2005 Groundwater Monitoring Report

#### **AB 681 (MACHADO) CHAPTER 255, STATUTES OF 1998**

AB 681 (Machado) Chapter 255, Statutes of 1998, made legislative changes to Chapters 6.7 and 6.75 of the Health and Safety Code adding requirements to landowner notification and participation requirements for fuel leak investigations. These legislative changes require the active or primary responsible party for a fuel leak case to ensure that all current property owners of the site are informed of cleanup actions or requests for closure and to forward to ACEH a complete mailing list of all record fee title holders to the site so that we can ensure that they are listed as responsible parties and kept informed about cleanup and closure decisions. Additionally, the primary or active responsible party must certify in writing that the notification requirement of Health and Safety Code, Section 25297.15, has been met and provide a mailing list of all record fee title owners to the local agency. ACEH's July 2, 2004 letter requested this information as well as telephone numbers for all RPs. We have not received a response to our request.

Messrs. Bond, Cox & Shoemaker

August 31, 2004

Page 4 of 4

Please provide a list of all record fee titleholders to the site, certification of the notification requirement, and the telephone numbers for the "responsible parties" by September 15, 2004.

#### PERJURY STATEMENT

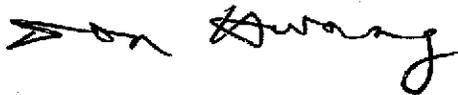
Please note, all work plans and technical reports submitted to this office must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached proposal or 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. A review of our case file indicates that none of your reports contain a perjury statement. **We request that perjury statements be submitted with all future reports for this site.**

#### AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement follow up. Enforcement follow up may include administrative action or monetary penalties of up to \$10,000 per day for each day of violation of the California Health and Safety Code, Section 25299.76.

If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang

Hazardous Materials Specialist  
Local Oversight Program

C: Charles Pardini, Levine-Fricke, 1900 Powell St., 12<sup>th</sup> Floor, Emeryville, CA 94608-1827  
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

June 20, 2003

Greater Bay Trust Co.  
C/o Leah S. Goldberg, Esq.  
Hanson, Bridgett, Marcus, Vlahos & Rudy  
333 Market St., Suite 2300  
San Francisco, CA 94105-2173

Dear Ms. Goldberg:

Subject: Fuel Leak Case No. RO0000148,  
Former Cox Cadillac, 230 Bay Pl., Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed "Addendum to Workplan Supplemental Site Investigation" dated May 21, 2003, and "Former Waste Oil UST Documentation" dated June 13, 2003, both by PES Environmental, Inc. and generally concur with the work proposed. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

#### TECHNICAL COMMENTS

TC 3, TC 4, TC 5) Waste Oil Tank Area Sampling - In addition to the high contaminant concentrations in groundwater previously noted, the inspection report of the tank removal dated December 1, 1988, indicated a strong hydrocarbon odor from the excavated soil. Floating product was observed on water in the bottom of the excavation. Holes were noted in the sides of the waste oil tank. Also, there is no information indicating that any residual contaminated soil or groundwater were removed from the excavation. The proposed grab groundwater sampling is inadequate for lateral and vertical soil and groundwater delineation from the Waste Oil Tank, additional sampling will be required. Please propose additional borings to delineate soil and groundwater contamination from the former waste oil tank area.

TC 5) Depth of Proposed Borings - Boring depths need to be of sufficient depth to delineate the vertical extent of leaks from the tank and piping. The proposal for collection of soil samples at 3 to 4 feet below ground surface (bgs) may be adequate for the piping area. Field observations during drilling and analytical results will determine if the sampling depths are adequate. PES Environmental proposes to collect soil samples from 8 and 12 feet bgs in the tank area. Instead, we request that you continuously core your borings and based on field observations choose to sample where there is likely to be the most contamination and for

Ms. Goldberg  
June 20, 2003  
Page 2 of 2

delineation. As stated previously, field observations and analytical results will determine if the sampling depths are adequate.

1) Utility Trenches Groundwater Sampling - Depth to water measurements from your wells show that groundwater has been shallower than 2 feet bgs indicating that the utility trenches may be preferential pathways for the spread of contamination from your site. We request that you perform groundwater sampling within the utility trenches in the vicinity of your site.

#### TECHNICAL REPORT REQUEST

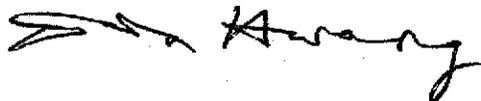
Please send the following technical reports to Alameda County Environmental Health (Attention: Don Hwang) by:

July 31, 2003 - Proposal for Soil and Groundwater Sampling by the Waste Oil Tank  
July 31, 2003 - Quarterly Report for the 2<sup>nd</sup> Quarter 2003  
October 31, 2003 - Utility Trenches Groundwater Sampling Report  
October 31, 2003 - Boring Sampling by the former Gasoline Tank Report  
October 31, 2003 - Quarterly Report for the 3<sup>rd</sup> Quarter 2003

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

Enclosure

C: Francois Bush, PES Environmental, Inc., 1682 Novato Blvd., Suite 100, Novato, CA  
94947-7021  
Donna Drogos  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



04-17-03  
ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

April 16, 2003

Greater Bay Trust Co.  
C/o Leah S. Goldberg, Esq.  
Hanson, Bridgett, Marcus, Vlahos & Rudy  
333 Market St., Suite 2300  
San Francisco, CA 94105-2173

Dear Ms. Goldberg:

Subject: Fuel Leak Case No. RO0000148,  
Former Cox Cadillac, 230 Bay Pl., Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed "Workplan Supplemental Site Investigation" dated January 24, 2003 by PES Environmental, Inc. It generally satisfies our concerns stated in our letter of July 31, 2002. Remediation and risk evaluation will not be addressed until after contamination at your site has been delineated. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) Groundwater analyses – In addition to those requested and proposed, please also include: ethanol.
- 2) Historical Hydraulic Gradients – A cumulative compilation is requested. Please show using a rose diagram with magnitude and direction on groundwater monitoring maps in the future.
- 3) Waste oil storage tank removal, December 1988 – Up to 140,000 microgram (ug/l) Total Petroleum Hydrocarbons – Gasoline (TPHG), 20,000 ug/l Benzene, and 2,800 ug/l Methyl Tertiary-Butyl Ether (MTBE) have been detected in nearby wells MW-1, TW-4, and TW-5. The most recent sampling event on October 22, 2002, found 42,000 ug/l TPHG and 2,800 ug/l Benzene. We do not have any information of the tank condition at the time of removal, observations of the excavation after removal of the tank, sampling of the excavation, or removal of soil or groundwater from the excavation. Please submit information on the tank removal and a completed "Underground Storage Tank Unauthorized Release (Leak) / Contamination Site Report".

Ms. Goldberg  
April 16, 2003  
Page 2 of 2

- 4) Proposed Grab Groundwater Sampling by former Waste Oil Tank – If the information on soil and groundwater sampling during tank removal is lacking, then the proposed grab groundwater sampling will be inadequate because lateral and vertical soil delineation from the Waste Oil Tank will need to be demonstrated. If this is the case, propose borings to sample soil and groundwater.
- 5) Depth of Proposed Borings – Soil samples are proposed for collection at 3 to 4 feet below ground surface. We do not approve of soil sample collection at those depths because we believe that deeper depths are required to delineate the vertical extent of leaks from the tank. Propose deeper depths for your borings.

#### TECHNICAL REPORT REQUEST

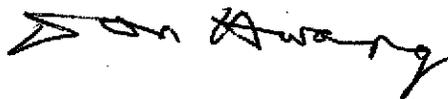
Please send the following technical reports to Alameda County Environmental Health (Attention: Don Hwang) by:

June 16, 2003 - Utility Trenches Groundwater Sampling Report  
June 16, 2003 - Boring Sampling by the former Gasoline Tank Report  
June 16, 2003 - Waste Oil Tank Removal Report  
June 16, 2003 - Proposal for Soil and Groundwater Sampling by the Waste Oil Tank  
July 31, 2003 - Quarterly Report for the Second Quarter 2003

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

Enclosure

C: Francois Bush, PES Environmental, Inc., 1682 Novato Blvd., Suite 100, Novato, CA  
94947-7021  
Donna Drogos  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



8-1-02

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

July 31, 2002

Greater Bay Trust Co.  
C/o Leah S. Goldberg, Esq.  
Hanson, Bridgett, Marcus, Vlahos & Rudy  
333 Market St., Suite 2300  
San Francisco, CA 94105-2173

Dear Ms. Goldberg:

Subject: Fuel Leak Case No. RO0000148,  
Former Cox Cadillac, 230 Bay Pl., Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed "Addendum to Workplan, Monitoring Well Installation, Resumption of Enhanced Bio-Remediation, and Resumption of Quarterly Sampling" dated December 17, 2001" by PES Environmental, 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 210,000 microgram (ug/l) Total Petroleum Hydrocarbons – Gasoline (TPHG) and 49,000 ug/l Benzene have been detected in off-site monitoring well TW-7, located 15' downgradient from the former gasoline Underground Storage Tank (UST). Hydropunch samples collected in the intersection of Bay Place and Vernon Street, downgradient of TW-7, were predominately NonDetectable (ND) for the constituents of concern (HP-1 detected 1.3 ug/l Benzene). The presence of utility lines in the street between TW-7 and the hydropunch sampling locations have been noted in previous report(s) for this site ("Corrective Action Plan Development Report, Phase 1," dated April 1, 1996, prepared by EOA, Inc.). Depth to water measurements from your wells show that groundwater has been shallower than 2' below ground surface (bgs) indicating that the utility trenches may be preferential pathways for the spread of contamination from your site.

Additionally, up to 8,700 ug/l Methyl Tertiary-Butyl Ether (MTBE) has been detected in wells immediately downgradient of your former gasoline UST. Up to 800 ug/l MTBE has also been detected in on-site well MW-1 in the vicinity of your former waste oil UST. The Quarterly Report, dated April 25, 2002, prepared by PES Environmental, Inc., (PES) suggests that downgradient detections of MTBE are due to an unidentified off-site source migrating through the aforementioned utility lines. PES also reports that on-site monitoring wells tested ND for MTBE in 1993, however analytical data tables show that analysis for MTBE was not performed until 1999 at this site. While the presence or absence of MTBE may be discerned from historic samples by having your analytical laboratory review their chromatographs and report results for MTBE there is no documentation in the County file of these results.

The lateral and vertical extent of contamination associated with your site is not defined. We request that you define the groundwater plume associated with your site. Also, rather than installing an additional groundwater monitoring well (MW-3) crossgradient of your site, we request that you perform groundwater sampling within the utility trenches in the vicinity of your site. Submit your proposal for plume definition in the work plan requested below.

- 2) **Enhanced Bioremediation** - PES reports successful results with enhanced bioremediation in TW-6 but no success in MW-2 and TW-7 due to low numbers of hydrocarbon degrading bacteria. PES proposes to introduce a culture of hydrocarbon degrading bacteria into monitoring wells at the site and add nutrients over a four-year period. The work plan also proposes to collect groundwater samples, which will be analyzed and then evaluated by a microbiologist to determine an appropriate batch culture for introduction into the wells. Please indicate the analyses that will be performed, how these results will determine the composition of the batch culture, provide documentation which demonstrates that this approach would work, and is safe. Additionally, as wells MW-2 and TW-7 have not seen a decrease in contaminant concentration during the pilot program we cannot endorse you to conduct your enhanced bioremediation program over a four-year period.
- 3) **Groundwater Cleanup Objectives** – a) The work plan proposes using 10,000 ug/l as the cleanup standard for TPHG. Alternatively, we approve of using the ceiling value of 5,000 ug/l found in the State Regional Water Quality Control Board (SRWQCB)'s "Application of Risk Based Screening Levels and Decision Making to Sites with Impacted Soil and Groundwater" dated December 2001.  
b) The work plan also proposes using Oakland-specific Tier 2 site specific target levels. However, the site does not appear to meet the eligibility criteria for its use. Please review the Oakland RBCA Eligibility Checklist.
- 4) **Fuel Oxygenate and Additive Analysis** - Groundwater analyses for fuel oxygenates and additives have not been performed at your site. Please collect and analyze groundwater samples for the following compounds: Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), Tertiary Butyl Alcohol (TBA), Ethylene

Ms. Goldberg  
July 31, 2002  
Page 3 of 4

Dibromide (EDB), and Ethylene Dichloride (EDC) by EPA Method 8260. Report your results in the Quarterly Report requested below.

- 5) **Tank Excavation Soil Residual Contamination** - A soil sample from the north sidewall of the tank excavation, S2, collected on January 27, 1994, found 4,300 mg/kg Total Volatile Hydrocarbons - Gasoline (TVH-G) and 40 mg/kg benzene. The tank excavation has not been over excavated. Over excavation of the pipeline trench on June 22, 1994 resulted in confirmation samples of 700, 620, and 260 mg/kg TVH-G, for S-3, S-4, and S-5, respectively. Over excavation pipeline sample results for benzene were 7.3, 6.1, and 3.1 mg/kg for S-3, S-4, and S-5, respectively. These soil residual concentrations need to be evaluated for risk to human health and the environment.
- 6) **Analytical Data Tables** - A review of analytical data from your site indicates that historical groundwater concentrations are reported incorrectly in some cases and data for additional analyses e.g., EDC and EBD are not reported in your tables. We request that you revise your tables to include all groundwater analytical results for the site and include these updated tables in all future reports submitted for this site.

#### TECHNICAL REPORT REQUEST

Please send the following technical reports to Alameda County Environmental Health (Attention: Don Hwang) by October 1, 2002:

Work Plan Addendum

Quarterly Report for the First Quarter 2002

Quarterly Report for the Second Quarter 2002

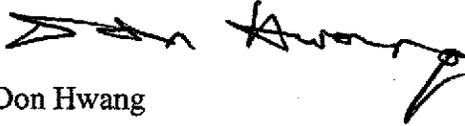
Quarterly Report for the Third Quarter 2002

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

If you have any questions, please call me at (510) 567-6746.

Ms. Goldberg  
July 31, 2002  
Page 4 of 4

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hwang", with a stylized flourish at the end.

Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Francois Bush, Andy Briefer, PES Environmental, Inc., 1682 Novato Blvd., Suite 100,  
Novato, CA 94947-7021

File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



9-29-01

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

September 19, 2001

Greater Bay Trust Co.  
C/o Leah S. Goldberg, Esq.  
Hanson, Bridgett, Marcus, Vlahos & Rudy  
333 Market St., Suite 2300  
San Francisco, CA 94105-2173

Dear Ms. Goldberg:

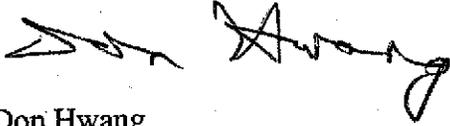
Subject: Former Cox Cadillac, 230 Bay Pl., Oakland, CA  
RO0000148

"Workplan, Monitoring Well Installation, Resumption of Enhanced Bio-Remediation, and Resumption of Quarterly Sampling" dated August 29, 2001" by PES Environmental, Inc., was reviewed. 1) We concur with the procedures for continued groundwater monitoring using the existing wells. 2) The installation of an offsite well between TW-7 and the intersection of Bay Place and Harrison Street to provide additional hydrogeologic data to assess the lateral extent of the hydrocarbon affected groundwater was proposed. However, the well construction specifications were incomplete. Include screen length and interval, depth interval, bottom cap or plug, etc. 3) The City of Oakland Risk-Based Corrective Action (RBCA) Tier 2 Site Specific Target Levels does not include Total Petroleum Hydrocarbons-Gasoline (TPH-G). TPH-G concentrations also need to be evaluated for human health and environmental risks using accepted risk assessment thresholds. 4) Bio-remediation of groundwater using cultured bacteria and periodic introduction of enriched water followed with Oxygen Releasing Compound (ORC) was proposed. Previously, bio-remediation using enriched water and ORC was tried at monitoring wells MW-2 and TW-7 but the groundwater contaminant concentrations did not decrease and the concentrations have in fact increased in MW-2 since the introduction of enriched water in March 1999. Provide documentation which demonstrates that this approach could be feasible. 5) Sampling of the trenches is required to indicate if the trenches are intercepting the onsite plume or are being used as pathways for an offsite source.

Ms. Goldberg  
September 19, 2001  
Page 2 of 2

Please provide an addendum to the workplan that will address the above concerns. If you have any questions, I may be reached at (510) 567-6746.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hwang", with a stylized flourish at the end.

Don Hwang  
Hazardous Materials Specialist

*er*

C: Francois Bush, Andy Briefer, PES Environmental, Inc., 1682 Novato Blvd., Suite  
100, Novato, CA 94947-7021

File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



04-09-01

20148

April 6, 2001

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

Greater Bay Trust Co.  
C/o Leah S. Goldberg, Esq.  
Hanson, Bridgett, Marcus, Vlahos & Rudy  
333 Market St., Suite 2300  
San Francisco, CA 94105-2173

Dear Ms. Goldberg:

Subject: Former Cox Cadillac, 230 Bay Pl., Oakland, CA  
StId 494

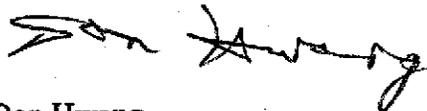
"Transmittal, Quarterly Groundwater Monitoring and Year-End Bio-Remediation Evaluation Report & Recommendations, ..." and "Quarterly Groundwater Monitoring and Year-End Bio-Remediation Evaluation Report & Recommendations, ..., May 24, 2000" by PES Environmental, Inc., were reviewed. 1) We concur with the recommendation to continue groundwater monitoring using the existing wells. 2) The other recommendation is the installation of an offsite well between TW-7 and the intersection of Bay Place and Harrison Street to assess if offsite sources are migrating toward the site. We believe sampling of the trenches may indicate if the trenches are being used as pathways. However, an explanation is needed for how the installation of a well at the location suggested is indicative of an offsite source, and whether additional sampling of the trenches is required to make this determination, and also if the trenches are intercepting the onsite plume. 3) Additionally, Andy Briefer, PES Environmental, Inc., stated that he wished to try bioremediation again at monitoring wells MW-2 and TW-7 but instead use bacterial cultures from the other monitoring wells. We would need to evaluate documentation which demonstrates that this approach could be feasible for monitoring wells MW-2 and TW-7. Previously, bio-remediation using enriched water and ORC was tried at these wells but the groundwater contaminant concentrations did not decrease and the concentrations have in fact increased in MW-2 since the introduction of enriched water in March 1999.

Ms. Goldberg  
April 6, 2001  
Page 2 of 2

A workplan must be submitted for sampling of the trenches and bioremediation of monitoring wells MW-2 and TW-7.

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

Sincerely,



Don Hwang  
Hazardous Materials Specialist

*u*  
C: Andy Briefer, PES Environmental, Inc., 1682 Novato Blvd., Suite 100, Novato,  
CA 94947

File



May 28, 1999

STID 494

Bill Cox  
Bill Cox Inc.  
C/o 100 Pine Street, Suite 2100  
San Francisco, CA 94612

RE: 230 Bay Pl., Oakland, CA 94612

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

### LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Cox:

This letter is to inform you of new legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, you have been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.

In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

**LANDOWNER NOTIFICATION**

Re: 230 Bay Pl., Oakland, CA 94612

May 28, 1999

Page 2 of 2

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

You may use the enclosed "notice of proposed action" form (sample letter 3) as a template to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

Please call me at (510) 567-6782 should you have any questions about the content of this letter.

Sincerely,



Thomas Peacock, Manager  
Environmental Protection Division

Attachments

c: Chuck Headlee, RWQCB

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

RO#148

April 8, 1999  
STID 494

Bill Cox Cadillac-Buick  
ATTN: Bill Cox  
232 E. 14th St.  
San Leandro, CA 94577

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, #250  
Alameda, CA 94502-6577  
(510) 567-6700 FAX (510) 337-9335  
H. W. Shephard, Jr.  
Wells Fargo Bank Trust  
P.O. Box 63700  
San Francisco, CA 94163

RE: 230 Bay Pl., Oakland, CA 94612

Dear Bill Cox:

This office had a meeting with PES Environmental, Inc. on March 31, 1999 concerning the above site. This site is all one site and the difference of opinion concerning the ownership of a waste oil tank and a fuel tank has not made it two sites. The contamination remaining has been determined to be from the fuel tank. The entire area has had varying sources of contamination, especially with the tank, known leaking piping, and a remote fuel dispenser. The former waste oil tank area is not currently being seen as a source of current contamination.

Fresh leaded gas is more consistent with a gas tank, even one recently used for unleaded gas, than from a waste oil tank. What is especially notable is that a sample in 1993 near the waste oil tank contained no TOG, a main indicator of waste oil contamination.

It was also mentioned that PES was working on a summary report, and a workplan for the addition of another monitoring well within the next two months. If you have any questions, please contact this office at (510) 567-6782.

Sincerely,

Thomas Peacock, Manager

Division of Environmental Protection

c: Dick Pantages, Chief - TP - files  
Will Mast and Andrew Briefer, PES Environmental,  
Inc., 1682 Novato Blvd., Suite 100, Novato, CA 94947  
Cheryl Gordon, UST Cleanup Fund

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0#148

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

October 1, 1997  
STID 494

Bill Cox Cadillac-Buick  
ATTN: Bill Cox  
232 E. 14th St.  
San Leandro, CA 94577

H. W. Shephard, Jr.  
Wells Fargo Bank Trust  
P.O. Box 63700  
San Francisco, CA 94163

RE: 230 Bay Pl., Oakland, CA 94612

Dear Bill Cox:

This office has received data concerning excavation, disposal of contaminated soils, and backfilling at the above site. The information was dated 9/10/97 by PES Environmental, Inc. The proposal, based on the sample results, is acceptable to this office.

There does not seem to have been any type of monitoring done at the wells on site for more than a year and yet the Cleanup Fund has authorized expenditure for this activity. Groundwater monitoring and reporting is required to be done as soon as possible. Please call this office at least 3 days prior to conducting the monitoring.

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

Sincerely,



Thomas Peacock, Manager  
Division of Environmental Protection

c: Gordon Coleman, Chief - files  
Will Mast, PES Environmental, Inc., 1682 Novato Blvd.,  
Suite 100, Novato, CA 94947  
Steve Marquez, UST Cleanup Fund

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

R0#148

STID 494

November 27, 1996

Bill Cox Cadillac  
ATTN: Bill Cox  
232 East 14th Street  
San Leandro, CA 94577

H. W. Shephard, Jr.  
Wells Fargo Bank Trust  
P. O. Box 63700  
San Francisco, CA 94163

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

RE: 230 BAY PLACE, OAKLAND, CA 94612

Dear Bill Cox:

This office is in receipt of and has completed review of the case file for this site, up to and including the November 26, 1996 PES Environmental, Inc., (PES) "Addendum to Revised Interim Remedial Action Plan".

**This work plan is approved.** Please submit a minimum of three bids for proposed work for pre-approval to Christopher Stevens of the State Water Resources Control Board. Recent changes in the legislation governing the UST Fund require that the UST Fund provide you with assistance in procuring contractor and consultant services for the implementation of the corrective action plan. Mr. Steven's direct line at the UST Fund in Sacramento is (916)227-4519.

**Please submit for pre-approval a minimum of three bids for the approved SCI work plan to Christopher Stevens of the UST Fund, within 15 days of the date of this letter, or no later than December 13, 1996.**

**Please be advised that this letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267(b) and Health and Safety Code Sections 25299.37 and 25299.78.** Should you have any questions or comments, please feel free to call me directly at (510)567-6880.

Sincerely,

Dale Klettke, CHMM  
Hazardous Materials Specialist

c: Don Eisenberg, EOA, Inc., 1410 Jackson Street, Oakland, CA 94612  
Andy Briefer, PES Environmental, 1682 Novato Blvd., Suite 100, Novato, CA 94947  
Leah S. Goldberg, c/o Hanson, Bridgett, Marcus, Vlahos & Rudy, LLP, 333 Market  
Street Suite 2300, San Francisco, CA 94105-2173  
Jeri Alexander, Subsurface Consultants, Inc., 171-12th St., Suite 201, Oakland, CA 94607  
Dale Klettke--files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO#148

STID 494

October 24, 1996

Hanson, Bridgett, Marcus, Vlahos & Rudy, LLP  
333 Market Street Suite 2300  
San Francisco, CA 94105-2173  
Attn: Leah S. Goldberg

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

RE: 230 BAY PLACE, OAKLAND, CA 94612

Dear Ms. Goldberg:

This office is in receipt of your October 23, 1996 letter, in which you requested a 15 day extension for submittal of a PES Environmental (PES) work plan. As you already are aware, this office has already approved an EOA, Inc., interim remedial action plan, and was requiring that three bids be submitted for pre-approval by Christopher Stevens of the UST Fund, no later than October 28, 1996.

Therefore, this office requests that the following schedule be adhered to for the submittal of the PES work plan, and the submittal of three bids for pre-approval to Christopher Stevens of the UST Fund:

- 1 Submittal of the PES work plan for review by this office, **by October 31, 1996.** Faxed copy of work plan will be sufficient.
- 2 Submittal of three bids for pre-approval by Christopher Stevens of the UST Fund, **no later than November 12, 1996.**

I have been in contact with Andy Briefer of PES Environmental, who will be preparing the interim remedial action plan for the Shephard trust. I have agreed that the work plan can be implemented in two phases, in order to commence excavation activities prior to the rainy season.

- ◆ Phase one will consist of all activities associated with the excavation of petroleum-affected soils in the vadose zone, as referenced in the approved EOA interim remedial action plan.
- ◆ Phase two will consist of implementation of an appropriate oxygen-releasing system, in this case, the controlled introduction of a hydrogen peroxide solution into the existing groundwater monitoring well network.

Recent changes in the legislation governing the UST Fund require that the UST Fund provide you with assistance in procuring contractor and consultant services for the implementation of the corrective action plan. Mr. Steven's direct line at the UST Fund in Sacramento is (916)227-4519.

Leah S. Goldberg  
RE: 230 Bay Place, Oakland  
October 24, 1996  
Page 2 of 2

**Please be advised that this letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267(b) and Health and Safety Code Sections 25299.37 and 25299.78.**

Should you have any questions or comments, please feel free to call me directly at (510)567-6880.

Sincerely,



Dale Klettke, CHMM  
Hazardous Materials Specialist

- c: Don Eisenberg, EOA, Inc., 1410 Jackson Street, Oakland, CA 94612  
Andy Briefer, PES Environmental, 1682 Novato Blvd., Suite 100, Novato, CA 94947  
Jeri Alexander, Subsurface Consultants, Inc., 171-12th St., Suite 201, Oakland, CA 9460  
H. W. Shephard, Jr., Wells Fargo Bank Trust, P. O. Box 63700, San Francisco, CA 94163  
Bill Cox, 232 East 14th Street, San Leandro, CA 94577  
Dale Klettke, LOP Manager--files

BC  
0494time.15d

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

20148

STID 494

September 26, 1996

Bill Cox Cadillac  
ATTN: Bill Cox  
232 East 14th Street  
San Leandro, CA 94577

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

H. W. Shephard, Jr.  
Wells Fargo Bank Trust  
P. O. Box 63700  
San Francisco, CA 94163

RE: 230 BAY PLACE, OAKLAND, CA 94612

Dear Bill Cox:

This office is in receipt of and has completed review of the case file for this site, up to and including the September 5, 1996 Subsurface Consultants, Inc., (SCI) "Corrective Action Plan Conceptual Remedial Design".

**This work plan is approved.** Please submit a minimum of three bids for proposed work for pre-approval to Christopher Stevens of the State Water Resources Control Board. Recent changes in the legislation governing the UST Fund require that the UST Fund provide you with assistance in procuring contractor and consultant services for the implementation of the corrective action plan. Mr. Steven's direct line at the UST Fund in Sacramento is (916)227-4519.

**Please submit for pre-approval a minimum of three bids for the approved SCI work plan to Christopher Stevens of the UST Fund, within 30 days of the date of this letter, or no later than October 28, 1996.**

**Please be advised that this letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267(b) and Health and Safety Code Sections 25299.37 and 25299.78.** Should you have any questions or comments, please feel free to call me directly at (510)567-6880.

Sincerely,

Dale Klettke, CHMM  
Hazardous Materials Specialist

c: Don Eisenberg, EOA, Inc., 1410 Jackson Street, Oakland, CA 94612  
Andy Briefer, PES Environmental, 1682 Novato Blvd., Suite 100, Novato, CA 94947  
Jeri Alexander, Subsurface Consultants, Inc., 171-12th St., Suite 201, Oakland, CA 94607  
Thomas Peacock, LOP Manager--files

0494wpok.cap

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Ro # 148

Alameda County CC4580  
Environmental Health Services  
1131 Harbor Bay Pkwy., #250  
Alameda CA 94502-6577  
(510)567-6700 FAX(510)337-9335

STID 494

June 25, 1996

Bill Cox Cadillac  
ATTN: Bill Cox  
232 East 14th Street  
San Leandro, CA 94577

H. W. Shephard, Jr.  
Wells Fargo Bank Trust  
P. O. Box 63700  
San Francisco, CA 94163

RE: 230 BAY PLACE, OAKLAND, CA 94612

Dear Bill Cox and the Wells Fargo Bank Trust:

This letter is to document the results of the meeting held on June 19, 1996 at the Alameda County Health Care Services Agency, 1131 Harbor Bay Parkway, Alameda, CA. In attendance was Don Eisenberg of EOA, Inc., Jeri Alexander of Subsurface Consultants, Inc., Andy Briefer of PES Environmental and Mr. Bill Cox. Alameda County was represented by Thomas Peacock and myself.

As discussed in the meeting, this office requests that Phase II of the Corrective Action Plan (CAP) be submitted to this office which evaluates a variety of alternative cleanup technologies to effectively address the petroleum hydrocarbon contamination found in both the unsaturated and saturated zones.

Benzene levels in groundwater far exceed Tier 1 Risk-Based Screening Levels (RBSLs) for a target level of 1E-05 (1 in 100,000 excess cancer risk). In addition, the benzene plume is being intercepted by numerous utilities in the direct vicinity of the down-gradient well TW-7, including a storm drain which discharges directly to the waters of Lake Merritt. **This site clearly does not qualify as a "Low-Risk Groundwater Case" as defined in the SWRCB "Supplemental Instructions to State Water Board December 8, 1995, Interim Guidance on Required Cleanup at Low Risk Sites".**

Active cleanup measures for soil and groundwater need to be evaluated at this site. A feasibility study should be conducted to evaluate potential site remediation alternatives. The objective of the feasibility study is to identify a cost effective measure or combination of measures to remediate the existing gasoline plume.

These active cleanup measures should achieve residual risk levels which permit use of the subject property for all of the potential uses (residential/commercial), for which it is currently zoned. The cleanup measures should be directed at reducing benzene concentrations in groundwater on-site, immediately down gradient of the release location, and in unsaturated soil in the immediate vicinity of the release, to levels which at a **minimum** meet Tier 1 RBCA screening levels for a 1E-05 (1 in 100,000) excess cancer risk. These target cleanup levels may need to be adjusted based on method detection limits and the actual observed overall effectiveness and cost of cleanup measures when implemented.

Mr Bill Cox and the Wells Fargo Bank Trust  
RE: 230 Bay Place, Oakland  
June 25, 1996  
Page 2 of 3

As presented in the ASTM E1739 - 95 Tier 1 Risk-Based Screening Level (RSBL) Look-Up Table, for a residential receptor scenario and exposure pathway "Groundwater-Vapor Intrusion from Groundwater to Buildings", the Tier 1 CA-modified RSBL target level for benzene (1E-05, or 1 in 100,000 excess cancer risk) is 0.069 mg/L or 69 ppb. In addition, for a residential receptor scenario and exposure pathway "Soil-Vapor Intrusion from Soil to Buildings", the Tier 1 CA-modified RSBL target level for benzene (1E-05, or 1 in 100,000 excess cancer risk) is 0.016 mg/L or 16 ppb.

My understanding is that the following remedial measures are to be evaluated during this study:<sup>1</sup>

- ◆ Excavation
- ◆ Soil-vapor extraction
- ◆ Insitu Bioremediation (active and passive methods)
- ◆ Bioaugmentation
- ◆ No Action (continued verification groundwater monitoring)

In addition, the following alternative cleanup technologies should be evaluated:

- ◆ Dual-phase extraction/Bioslurping
- ◆ Bioventing
- ◆ Air Sparging/Biosparging

Please incorporate the following information into Phase II of the CAP:

- 1) time frame defining specific tasks to be completed (feasibility evaluation and conceptual design)
- 2) cost/benefit analysis for each alternative cleanup technology evaluated

In addition, groundwater samples were analyzed for the Phase I CAP as part of a hydrocarbon-degrading bacterial plate enumeration assay. As documented in the February 29, 1996 CytoCulture Environmental Biotechnology report, "these water samples had low densities of hydrocarbon materials and low levels of dissolved nutrients. The dissolved oxygen levels also suggested relatively low biodegradation activity. This site might benefit from nutrient enhancement and bacterial augmentation".

Therefore, as part of an interim remedial action plan, please propose measures to be addressed concurrently with the ongoing investigation and feasibility studies, to reduce onsite groundwater benzene concentrations.

---

<sup>1</sup>These items were proposed in EOA's, Corrective Action Plan, Attachment 1 - Proposed Scope of Work.

Bill Cox  
RE: 230 Bay Place, Oakland  
June 25, 1996  
Page 3 of 3

**Phase II of the Corrective Action Plan (CAP) including the Interim Remedial Action Plan is due within 30 days of the date of this letter, or by July 26, 1996. Please be advised that this letter constitutes a Legal Request for Technical Reports pursuant to California Health and Safety Code Sections 25299.37 and 25299.78.**

Failure to undertake the required corrective action, including the submittal of a technical report after the date specified in this request, may result in fines of up to \$5,000 per day per tank pursuant to Health and Safety Code section 25299 and \$10,000 per day per tank pursuant to Health and Safety Code section 25299.76.

Please continue to adhere to a **quarterly** schedule of well sampling, monitoring, and report submittal as referenced in Title 23, California Code of Regulations (CCR) section 2652(d). Sample analytes shall continue to be total volatile hydrocarbons as gasoline, (TVHg), EPA Method 8010 compounds (1,2-DCA) and the aromatic hydrocarbons benzene, toluene, ethyl benzene and total xylene isomers (BTEX). **In addition, please have the groundwater samples analyzed for the presence of methyl-tert-butyl ether (MTBE).** The MTBE analysis is being requested by the Regional Water Quality Control Board (RWQCB).

Should you have any questions or comments, please feel free to call me directly at (510)567-6880.

Sincerely,



Dale Klettke, CHMM  
Hazardous Materials Specialist

c: Don Eisenberg, EOA, Inc., 1410 Jackson Street, Oakland, CA 94612  
Andy Briefer, PES Environmental, 1682 Novato Blvd., Suite 100, Novato, CA 94947  
Gil Jensen, Alameda County District Attorneys Office  
Christopher Stevens, UST Fund  
Thomas Peacock, LOP Manager--files

*Be*

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#148

Alameda County CC4580  
Environmental Health Services  
1131 Harbor Bay Pkwy., #250  
Alameda CA 94502-6577  
(510)567-6700 FAX(510)337-9335

STID 494

May 29, 1996

Bill Cox Cadillac  
ATTN: Bill Cox  
232 East 14th Street  
San Leandro, CA 94577

H. W. Shephard, Jr.  
Wells Fargo Bank Trust  
P. O. Box 63700  
San Francisco, CA 94163

RE: 230 BAY PLACE, OAKLAND, CA 94612

Dear Bill Cox:

This office is in receipt of and has completed review of the case file for this site, up to and including your May 20, 1996 letter.

For your information, in order for your site to qualify as a "Low Risk Groundwater Case" the following definitions must apply:

- 1) The leak has been stopped and ongoing sources, including free product, have been removed or remediated.
- 2) The site has been adequately characterized.
- 3) The dissolved hydrocarbon plume is not migrating.
- 4) No water well, deeper drinking water aquifers, surface water, or other sensitive receptors are likely to be impacted.
- 5) The site presents no significant risk to human health.
- 6) The site presents no significant risk to the environment.

As documented in the State Water Board December 8, 1995, Interim Guidance on Required Cleanup at Low Risk Fuel Sites, passive remediation, in conjunction with monitoring, is the preferred remedial alternative for "Low-Risk Groundwater Cases", unless there is a compelling reason to do otherwise.

A partial list of reasons that may justify active remediation are listed below:

- Groundwater within the plume is likely to be used before natural biodegradation is projected to complete the cleanup.
- Sensitive receptors have been identified and are projected to be adversely impacted.
- The plume is migrating significantly.
- Another remedial alternative is shown to be more cost effective.

Mr Bill Cox  
RE: 230 Bay Place, Oakland  
May 29, 1996  
Page 2 of 3

Generally, if any of these conditions or others deemed to be compelling are met, a more aggressive remedial approach may be appropriate.

**I disagree with the conclusions of your consultant that neither the benzene concentration in soil, nor current levels of discharge from groundwater to the storm sewer, represent sufficient basis for concluding that passive remediation is not acceptable at this site. Additional investigation and/or monitoring of water in the storm sewer will not reduce the risk for potential off-site receptors, nor will it reduce the risk for adverse impact of the waters of Lake Merritt.**

After cursory review of the April 1, 1996 EOA, Inc. "Corrective Action Plan Development Report Phase 1", documentation of gasoline odors reported to representatives of EOA ("who were told verbally on several occasions") which were detected near storm sewer drop structures was curiously missing. As documented in the April 1, 1996 EOA, Inc report, "*a more likely pathway for ecological exposure would be through infiltration to storm sewers and subsequent discharge*" and "*it is our opinion that there is not presently a discharge from groundwater to the storm sewers at sufficient level to cause odors*". This opinion was reached based on vault observations of the three storm drain drop inlets during which "The three inlets did not appear to contain any water, nor were any notable odors observed". This would indeed be the case when no storm water discharge was occurring at the site, and odors would likely be present only during periods of storm water discharge. In addition, your consultants argues, that should contaminated groundwater infiltrate into storm water sewers it would likely be diluted prior to final discharge, incorrectly assumes that any amount of discharge of pollutants is allowed into the storm sewer system. **This is strictly forbidden by the Clean Water Act.**

Because of the potential for surface water impact and its likely impact to human and aquatic life, this office does not consider this site one of low risk. Therefore, this site does not warrant classification as a "Low-Risk Groundwater Case", for which passive remediation in conjunction with groundwater monitoring is the preferred remedial alternative.

**Your request for an extension on the implementation of Phase II of your Corrective Action Plan is denied. Therefore, you are directed to proceed with Phase II of the CAP. Please notify this office 72 hours in advance of field operations involving the implementation of Phase II of the CAP. Should you have any questions or comments, please feel free to call me directly at (510)567-6880.**

Sincerely,



Dale Klettke, CHMM  
Hazardous Materials Specialist

Mr Bill Cox  
RE: 230 Bay Place, Oakland  
May 29, 1996  
Page 3 of 3

c: Gil Jensen, Alameda County District Attorneys Office  
Don Eisenberg, EOA, Inc., 1410 Jackson Street, Oakland, CA 94612  
Andrew A. Briefer, PES Environmental Inc., 1682 Novato Blvd, Suite 100, Novato, CA  
94947  
Kevin Graves, RWQCB  
Thomas Peacock, LOP Manager--files

*bc*

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ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0#148

Alameda County CC4580  
Environmental Health Services  
1131 Harbor Bay Pkwy., #250  
Alameda CA 94502-6577  
(510)567-6700 FAX(510)337-9335

STID 494

May 2, 1996

Bill Cox Cadillac  
ATTN: Bill Cox  
232 East 14th Street  
San Leandro, CA 94577

H. W. Shephard, Jr.  
Wells Fargo Bank Trust  
P. O. Box 63700  
San Francisco, CA 94163

RE: 230 BAY PLACE, OAKLAND, CA 94612

Dear Bill Cox:

This office is in receipt of and has completed review of the case file for this site, up to and including the April 1, 1996 EOA, Inc., "Corrective Action Plan Development Report - Phase I".

Phase I of the Corrective Action Plan (CAP) was initiated for the following reasons:

- 1) to develop additional information about subsurface conditions which may effect movement of groundwater and the hydrocarbon plume.
- 2) to carry out a screening-level risk assessment to determine whether this site might be categorized as a "low risk" site pursuant to recent guidelines from the Regional Water Quality Control Board (RWQCB) or alternatively, what concentrations in soil and groundwater would need to be achieved to achieve such a classification.
- 3) to carry out biotreatability testing to determine the biodegradation activity and nutrient characteristics of the groundwater for use in selecting appropriate remediation measures in Phase II of the CAP development effort.

Results of a preliminary Tier I risk-based site assessment indicated that benzene concentrations exceeded risk based screening levels (RBSLs) for the exposure pathways "soil vapor intrusion from soil to buildings", "soil volatilization to outdoor air" and groundwater vapor intrusion to buildings" for a target risk level of 1E-05. Based on the information developed for this report, it appears necessary to reduce groundwater benzene concentrations under the building (and at the Bay Street property boundary) into the range of less than 0.2 mg/L to achieve cancer risk target levels of less than 1E-05 (1 in 100,000).

On April 22, 1996, I had a chance to visit the site to determine locations of possible off-site receptors in order to develop defensible Tier 2 site specific target levels ( SSTLs). During my visit I spoke with Frank Tinley (resident engineer - 835-4700) of the St. Pauls Tower Complex located at 100 Bay Place. He informed me that compliants were filed (City of Oakland?) pertaining to the occurrence of gasoline odors emanating from the storm drains located at the corner of Bay Place and Vernon Street. He stated that at times these odors were very strong, but

Mr Bill Cox  
RE: 230 Bay Place, Oakland  
May 2, 1996  
Page 2 of 2

Ro# 148

that the odors had not been reported recently. These storm drains discharge directly to the waters of Lake Merritt, which is approximately 700 feet south of the site. Therefore this agency determines that at the present time, passive remediation, in conjunction with monitoring, is not a viable alternative and that active measures will be required in order to protect the waters of Lake Merritt.

**Therefore, you are directed to proceed with Phase II of the Corrective Action Plan. Please implement Phase II of the CAP within 30 days of the date of this letter, or no later than June 3, 1996.**

In addition, this office has also reviewed the April 18, 1996 PES Environmental, Inc., "Work Plan Potential Source Investigation".

This work plan was developed in order to address additional potential sources of contamination which were noted during a site walk-through performed by PES, EOA and yourself in January 1996. Areas of concern include, but are not limited to, hydraulic lifts, floor drains and sumps at the former indoor service area, and floor drains and sumps in the paint booth and bodywork area. In addition, no documentation exists regarding the removal of a suspected second waste oil tank near the former wash rack area.

The PES Environmental work plan is approved. Please be advised that the implementation of the PES work plan should not in any way, delay implementation of Phase II of the Corrective Action Plan.

Should you have any questions or comments, please feel free to call me directly at (510)567-6880.

Sincerely,



Dale Klettke, CHMM  
Hazardous Materials Specialist

c: Don Eisenberg, EOA, Inc., 1410 Jackson Street, Oakland, CA 94612  
Andrew A. Briefer, PES Environmental Inc., 1682 Novato Blvd, Suite 100, Novato, CA 94947  
Kevin Graves, RWQCB  
Thomas Peacock, LOP Manager--files

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Pc

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0#148  
RAFAT A. SHAHID, DIRECTOR

STID 494

February 26, 1996

Bill Cox Cadillac  
ATTN: Bill Cox  
232 East 14th Street  
San Leandro, CA 94577

H. W. Shephard, Jr.  
Wells Fargo Bank Trust  
P. O. Box 63700  
San Francisco, CA 94163

RE: 230 BAY PLACE, OAKLAND, CA 94612

Dear Bill Cox:

This office is in receipt of and has completed review of the case file for this site, up to and including the February 20, 1996 EOA, Inc., "Cox Cadillac Corrective Action Plan".

It is my understanding that the Corrective Action Plan (CAP) will be completed in two phases; the first phase of work for the CAP will include the following:

- \* Review of Site History to Identify Potential Subsurface Structures;
- \* Utility Location Review
- \* Develop Assumptions Regarding Magnitude and Extent of Hydrocarbon Plume Beneath Building
- \* Preliminary Risk Assessment (based on assumptions above)
- \* Biotreatability Sampling and Analysis

The Feasibility Study and the Conceptual Remedial Design will be completed during the second phase of work and will be contingent upon the results of the first phase of work.

**Please proceed with Phase I of the Corrective Action Plan.** Should you have any questions or comments, please feel free to call me directly at (510)567-6880.

Sincerely,

Dale Klettke, CHMM  
Hazardous Materials Specialist

c: Don Eisenberg, EOA, Inc., 1410 Jackson Street, Oakland, CA 94612  
Thomas Peacock, LOP Manager--files

0494cap.ok

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO# 148

ARNOLD PERKINS, DIRECTOR  
RAFAT A. SHAHID, DEPUTY DIRECTOR

STID 494

January 9, 1996

Bill Cox Cadillac  
ATTN: Bill Cox  
232 East 14th Street  
San Leandro, CA 94577

H. W. Shephard, Jr.  
Wells Fargo Bank Trust  
P. O. Box 63700  
San Francisco, CA 94163

Alameda County  
Environmental Protection Division  
1131 Harbor Bay Parkway, Room 250  
Alameda CA 94502-6577  
(510) 567-6700

RE: 230 BAY PLACE, OAKLAND, CA 94612

Dear Bill Cox:

This office is in receipt of and has completed review of the case file for this site, up to and including the November 7, 1995 EOA, Inc., "Fourth Quarterly Monitoring Report".

Groundwater analyses performed since October 1993 have documented elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg) and benzene, toluene, ethyl benzene and total xylenes (BTEX) in groundwater samples collected from monitoring wells MW-1, TW-6 and TW-7. Monitoring well MW-1 is reported to be in the "inferred" down gradient location from the former waste oil UST, and TW-7 is "inferred" to be down gradient from the former 10,000-gallon gasoline UST. Lake Merritt is approximately 700 feet towards the southwest, down gradient of the two former UST locations.

MW-1 was initially sampled on 3/3/93 and has been monitored for six quarters, and monitoring wells TW-6 and TW-7 were initially sampled on 10/14/93 and have been sampled for five quarters. Maximum reported TPHg concentrations detected in monitoring wells MW-1, TW-6 and TW-7 are 110 ppm, 47 ppm and 210 ppm, respectively. Maximum reported benzene concentrations detected in the three monitoring wells are 18 ppm, 19 ppm and 49 ppm, respectively. In addition, 1,2-DCA was detected at a concentration of 980 ppb in the groundwater sample collected from monitoring well MW-1 for the September 29, 1995 sampling event.

As documented in the September 12, 1995 EOA "Offsite Groundwater "Hydro punch" Sampling report, offsite migration of contaminants in the direction suggested by the on-site groundwater flow appears to be minimal. However, EOA states in the discussion that the dramatic discontinuity between pollution levels in TW-7 and the locations sampled in the "Hydro punch" study may be the result of natural attenuation or, **more likely, a result of the shallowest groundwater being intercepted and drained by porous materials in pipe trench backfills associated with the numerous utilities which are know to run through the immediate are of TW-7 and HP-1, in a direction approximately perpendicular to the direction of on-site groundwater flow.**

Mr Bill Cox  
RE: 230 Bay Place, Oakland  
January 9, 1996  
Page 2 of 2

As discussed in my meeting with yourself, Don Eisenberg of EOA, Inc and Attorney at Law-Robert Cross on January 8, 1996, this office requests that a Corrective Action Plan (CAP) be submitted to this office which evaluates a variety of alternative cleanup technologies to effectively address the petroleum hydrocarbon contamination found in both the unsaturated and saturated zones. The hydrocarbons which have been detected beneath the site consist mostly of a mixture of gasoline constituents.

The distribution of the petroleum hydrocarbons have been detected in two primary phases: adsorbed in the soils and dissolved in the groundwater. A feasibility study should be performed to determine the best technology to be used for remediation of the soil and groundwater contamination. Source removal, including additional excavation of petroleum hydrocarbon impacted soils should be addressed in the feasibility study. The CAP should also address possible migration of contaminants along preferred pathways such as those associated with the numerous utilities reported in the immediate area of TW-7 and HP-1.

**This Corrective Action Plan is due within 90 days of the date of this letter, or by April 9, 1996.**

I have recently taken over this case file from Thomas Peacock of this office. Should you have any questions or comments, please feel free to call me directly at (510)567-6880.

Sincerely,



Dale Klettke, CHMM  
Hazardous Materials Specialist

c: Don Eisenberg, EOA, Inc., 1410 Jackson Street, Oakland, CA 94612  
Gil Jensen, Alameda County District Attorneys Office  
Thomas Peacock, Supervising Hazardous Materials Specialist--files

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0148

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6700

September 18, 1995  
STID 494

Bill Cox Cadillac  
ATTN: Bill Cox  
232 E. 14th St.  
San Leandro, CA 94577

H. W. Shephard, Jr.  
Wells Fargo Bank Trust  
P.O. Box 63700  
San Francisco, CA 94163

RE: 230 Bay Pl., Oakland, CA 94612

Dear Bill Cox:

This office has received a third Quarterly Monitoring Report dated July 25, 1995 by EOA, Inc. for the above site. The report is accepted with further comments as follows:

1. It is assumed that the further groundwater investigation to investigate the lateral extent of contamination will be in the next report.
2. The levels of contamination are extremely high, although they are reported in ppm. Normally groundwater samples are reported in ppb which would mean levels are as high as 100,000 ppb of TPHg and 39,000 ppb of benzene.

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

Sincerely,

Thomas Peacock, Supervising HMS  
Division of Environmental Protection

c: George Young, Acting Chief - files  
Gil Jensen, Alameda County District Attorney's Office  
Hubert Lenczowski, Knox Ricksen, 1999 Harrison St., Suite  
1700, Oakland, CA 94612-3500  
Rory Campbell, Hanson, Bridgett, Marcus, Vlahos & Rudy, 333  
Market St., Suite 2300, San Francisco, CA 94105  
Robert Creps, PES Environmental, Inc., 1682 Novato Blvd.,  
Suite 100, Novato, CA 94947  
Sherris Ragsdale, EOA, Inc., 1410 Jackson St., Oakland, CA  
94612

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0148

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6700

May 25, 1995  
STID 494

Bill Cox Cadillac  
ATTN: Bill Cox  
232 E. 14th St.  
San Leandro, CA 94577

H. W. Shephard, Jr.  
Wells Fargo Bank Trust  
P.O. Box 63700  
San Francisco, CA 94163

RE: 230 Bay Pl., Oakland, CA 94612

Dear Bill Cox:

This office has received a Quarterly Monitoring Report dated April 21, 1995 by EOA, Inc. for the above site. The report is accepted with further comments as follows:

1. You are required to implement a groundwater investigation in order to investigate the lateral extent of contamination. All of this is a normal part of a groundwater investigation that needs to be done and has not yet begun. This office expects a workplan for further investigation to be submitted within 30 days of this letter, which should include the installation of additional groundwater monitoring wells.
2. The levels of contamination are extremely high, although they are reported in ppm. Normally groundwater samples are reported in ppb which would mean levels are as high as 56,000 ppb of TPHg and 13,000 ppb of benzene.
3. You have no downgradient well that is not contaminated so it is unknown the extent of the plume. Additional wells must be proposed and installed as soon as possible. You are directed to respond to this office within 30 days.
4. This office checked records concerning the waste oil tank. Although a March 31, 1994 letter excused the waste oil tank as the source of contamination, recent evidence does not. MW-1, which is immediately down gradient from the waste oil tank has detected contaminants commonly associated with waste oil. Therefore, both tanks should be considered as sources of the various types of contamination now being detected.

Bill Cox Cadillac  
STID 494  
May 25, 1995  
Page 2 of 2

5. Also found in the file was a Nov. 22, 1989 report from Pac Bell of gas in a manhole in the street outside of the driveway west of the former gas tank on Bay St. This certainly makes important proceeding with the investigation down gradient and off site.

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

Sincerely,



Thomas Peacock, Supervising HMS  
Division of Environmental Protection

cc: Mee Ling Tung, Acting Chief - files  
Gil Jensen, Alameda County District Attorney's Office

Hubert Lenczowski, Knox Rickson, 1999 Harrison St., Suite  
1700, Oakland, CA 94612-3500

Rory Campbell, Hanson, Bridgett, Marcus, Vlahos & Rudy, 333  
Market St., Suite 2300, San Francisco, CA 94105

Robert Creps, PES Environmental, Inc., 1682 Novato Blvd.,  
Suite 100, Novato, CA 94947

Don Eisenberg, EOA, Inc., 1410 Jackson St., Oakland, CA  
94612

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0148

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

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

March 7, 1995  
STID 494

Bill Cox Cadillac  
ATTN: Bill Cox  
230 Bay Pl.  
Oakland, CA 94612

RE: 230 Bay Pl., Oakland, CA 94612

Dear Bill Cox:

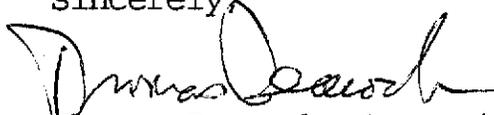
This office has received a Well Conversion and First Quarterly Monitoring Report dated January 30, 1995 by EOA, Inc. for the above site. There is not a summary or recommendations in this report. Further comments are as follows:

1. You are required to implement a groundwater investigation in order to investigate the lateral extent of contamination. All of this is a normal part of a groundwater investigation that needs to be done and has not yet begun. This office expects a workplan for further investigation to be submitted within 30 days of this letter, which should include the installation of additional groundwater monitoring wells.
2. The levels of contamination are extremely high, although they are reported in ppm. Normally groundwater samples are reported in ppb which would mean levels are as high as 210,000 ppb of TPHg and 49,000 ppb of benzene.
3. You have no downgradient well that is not contaminated so it is unknown the extent of the plume. Additional wells must be proposed and installed as soon as possible. You are directed to respond to this office within 30 days.
4. It would be a good idea to also sample TW-1 and TW-2 as they are upgradient and they would at least define the plume in that direction. The gradient seems to be very flat and may not be consistent.

Bill Cox Cadillac  
STID 494  
March 7, 1995  
Page 2 of 2

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

Sincerely,



Thomas Peacock, Supervising HMS  
Hazardous Material Division

cc: Gordon Coleman, Acting Chief - files  
Gil Jensen, Alameda County District Attorney's Office  
H. W. Shephard, Jr., Wells Fargo Bank Trust, P.O. Box  
63700, San Francisco, CA 94163  
Hubert Lenczowski, Knox Ricksen, 1999 Harrison St., Suite  
1700, Oakland, CA 94612-3500  
Rory Campbell, Hanson, Bridgett, Marcus, Vlahos & Rudy, 333  
Market St., Suite 2300, San Francisco, CA 94105  
Robert Creps, PES Environmental, Inc., 1682 Novato Blvd.,  
Suite 100, Novato, CA 94947  
Don Eisenberg, EOA, Inc., 1410 Jackson St., Oakland, CA  
94612

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0148

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

November 8, 1994  
STID 494

Bill Cox Cadillac  
ATTN: Bill Cox  
230 Bay Pl.  
Oakland, CA 94612

ALAMEDA COUNTY CC4580  
DEPT. OF ENVIRONMENTAL HEALTH  
ENVIRONMENTAL PROTECTION DIVISION  
1131 HARBOR BAY PKWY., #250  
ALAMEDA CA 94502-6577

RE: 230 Bay Pl., Oakland, CA 94612

Dear Bill Cox:

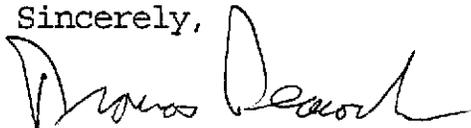
This office has received a Report of Soil Excavation and Disposal Activities dated September 1994 by EOA, Inc. for the above site. This office concurs with the summary on page 5 and recommendation that a groundwater impact be evaluated. Further comments are as follows:

1. Although quarterly reports are required to be submitted, there has not been any groundwater sampling done in over a year. The last report had recommendations which included proceeding with a groundwater investigation. This has not occurred.
2. Page 1 of this report says that another report will be submitted by Decon Environmental Services. This report has not been submitted.
3. You are required to implement a groundwater investigation. The last report in December 1993 recommended converting temporary wells into permanent wells, monitoring these wells for contamination, and drilling additional wells down gradient to investigate the lateral extent of contamination. All of this is a normal part of the groundwater investigation that needs to be done and has not yet begun. This office expects a workplan for further investigation to be submitted within 60 days of this letter.
4. Additionally, you should be submitting a quarterly report as soon as possible.

Bill Cox Cadillac & Buick  
STID 494  
November 8, 1994  
Page 2 of 2

If you have any questions, please contact this office at (510) 567-6782. Note that our office has moved.

Sincerely,



Thomas Peacock, Supervising HMS  
Hazardous Material Division

cc: Edgar Howell, III, Chief - files  
Gil Jensen, Alameda County District Attorney's Office  
H. W. Shephard, Jr., Wells Fargo Bank Trust, P.O. Box  
63700, San Francisco, CA 94163  
Hubert Lenczowski, Knox Ricksen, 1999 Harrison St., Suite  
1700, Oakland, CA 94612-3500  
Rory Campbell, Hanson, Bridgett, Marcus, Vlahos & Rudy, 333  
Market St., Suite 2300, San Francisco, CA 94105  
Robert Creps, PES Environmental, Inc., 1682 Novato Blvd.,  
Suite 100, Novato, CA 94947  
EOA, Inc., 1410 Jackson St., Oakland, CA 94612

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0148

RAFAT A. SHAHID, Assistant Agency Director

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

July 21, 1994

Sherri Ragsdale  
c/o EOA,  
1410 Jackson Street,  
Oakland, CA 94612

Subject: Copy of UST Permit Issued to 230 Bay Place,  
Oakland, CA 94612

Dear Ms. Ragsdale:

Enclosed you will find a photocopy of a "Interim Permit" for three underground storage tanks (USTs) issued on May 5, 1994. This permit was for a duration of six (6) months.

There is no other record on file for permitting the underground tanks on site following the issuance of the interim permit.

According to the record, there are no underground storage tanks at the above address. However you will note that the interim permit states that the permit was issued for three (3) USTs. This office requests any information that might be available to aid in the reconciliation of these conflicting figures.

Please call this office if I can be of any further assistance. The temporary number is (510) 337-2865.

Sincerely,

A handwritten signature in cursive script, appearing to read "Brian P. Oliva".

Brian P. Oliva, REHS, REA  
Hazardous Materials Specialist

c: files

bc

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0148

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

June 7, 1994  
STID 494

Bill Cox Cadillac  
ATTN: Bill Theuringer  
230 Bay Pl.  
Oakland, CA 94612

RE: 230 Bay Pl., Oakland, CA 94612

Dear Bill Theuringer:

This office has received a Workplan for Further Investigation dated March 1994 by EOA, Inc. for the above site. This office concurs with the proposal except for the selection of wells which is mentioned on page 5, as follows:

TW-1 and TW-2 were both found to be ND on the sampling that was done. Furthermore, they both are essentially upgradient since the former waste oil tank area does not seem to be involved in any of the existing contamination. This office recommends that instead TW-2 may be used for an upgradient well, if that is needed and that TW-6 should be used to better define the lateral extent of contamination.

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

Sincerely,

A handwritten signature in cursive script, appearing to read 'Thomas Peacock'.

Thomas Peacock, Supervising HMS  
Hazardous Material Division

cc: Edgar Howell, III, Chief - files  
Gil Jensen, Alameda County District Attorney's Office  
H. W. Shephard, Jr., Wells Fargo Bank Trust, P.O. Box  
63700, San Francisco, CA 94163  
Hubert Lenczowski, Knox Ricksen, 1999 Harrison St., Suite  
1700, Oakland, CA 94612-3500  
Rory Campbell, Hanson, Bridgett, Marcus, Vlahos & Rudy, 333  
Market St., Suite 2300, San Francisco, CA 94105  
Robert Creps, PES Environmental, Inc., 1682 Novato Blvd.,  
Suite 100, Novato, CA 94947  
EOA, Inc., 1410 Jackson St., Oakland, CA 94612

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0148

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

March 31, 1994  
STID 494

Bill Cox Cadillac  
ATTN: Bill Theuringer  
230 Bay Pl.  
Oakland, CA 94612

RE: 230 Bay Pl., Oakland, CA 94612

Dear Bill Theuringer:

This office has received a letter dated March 10, 1994 concerning the status of the former waste oil tank at the above site. This office concurs with the hypothesis that contamination on the site has not resulted from any leak of the waste oil tank. This office still looks forward to the underground tank removal report, although results in the December 23, 1993 Report confirm an extensive gasoline contamination. The evidence points towards a leak of the gasoline tank and associated piping which was recently removed at the site. It is expected that a soil and groundwater investigation will proceed to determine the extent of contamination.

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

Sincerely,

Thomas Peacock, Supervising HMS  
Hazardous Material Division

cc: Edgar Howell, III, Chief - files  
Gil Jensen, Alameda County District Attorney's Office  
H. W. Shephard, Jr., Wells Fargo Bank Trust, P.O. Box  
63700, San Francisco, CA 94163  
Hubert Lenczowski, Knox Ricksen, 1999 Harrison St., Suite  
1700, Oakland, CA 94612-3500  
Rory Campbell, Hanson, Bridgett, Marcus, Vlahos & Rudy, 333  
Market St., Suite 2300, San Francisco, CA 94105  
Robert Creps, PES Environmental, Inc., 1682 Novato Blvd.,  
Suite 100, Novato, CA 94947

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0148

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

January 31, 1994  
STID 494

Bill Cox Cadillac  
ATTN: Bill Theuringer  
230 Bay Pl.  
Oakland, CA 94612

RE: 230 Bay Pl., Oakland, CA 94612

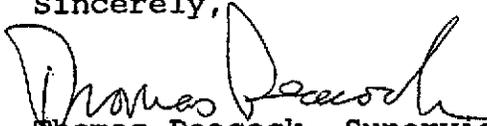
Dear Bill Theuringer:

This office has received and reviewed a Report of Soil and Groundwater Investigation dated December 23, 1993 and several other correspondences for the above site. This office concurs with the recommendations on page 13 with the following comments:

1. An Unauthorized Leak Report was filed on this site on 12-05-88.
2. The underground tank has already been removed.

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

Sincerely,

  
Thomas Peacock, Supervising HMS  
Hazardous Material Division

cc: Edgar Howell, III, Chief - files  
Gil Jensen, Alameda County District Attorney's Office  
H. W. Shephard, Jr., Wells Fargo Bank Trust, P.O. Box  
63700, San Francisco, CA 94163  
Hubert Lenczowski, Knox Ricksen, 1999 Harrison St., Suite  
1700, Oakland, CA 94612-3500  
Rory Campbell, Hanson, Bridgett, Marcus, Vlahos & Rudy, 333  
Market St., Suite 2300, San Francisco, CA 94105

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0148

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

January 4, 1994  
STID 494

Bill Cox Cadillac  
ATTN: Bill Theuringer  
230 Bay Pl.  
Oakland, CA 94612

RE: 230 Bay Pl., Oakland, CA 94612

**NOTICE OF VIOLATION**

Dear Bill Theuringer:

You were directed in a letter from this office dated December 15, 1992, to address the following issues concerning contamination on the above site.

1. You were directed in a letter from this office dated December 28, 1990 to begin a soil and groundwater investigation concerning contamination from the waste oil tank.
2. This office has information that PES did a "Supplemental Groundwater Investigation" in 1993. No report has been forwarded to this office.
3. It is clear that petroleum hydrocarbons in groundwater at the above site requires a soil and groundwater investigation.

A workplan was submitted by PES dated February 4, 1993 and approved by this office February 22, 1993. However, no report has been submitted and no contact has been made with this office concerning implementation of the workplan.

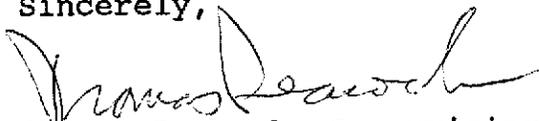
I have enclosed the document, Appendix A, Workplan for Initial Subsurface Investigation, a guidance document published by the Regional Water Quality Control Board (RWQCB).

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

Bill Cox Cadillac  
STID # 494  
January 4, 1994  
Page 2 of 2

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

Sincerely,



Thomas Peacock, Supervising HMS  
Hazardous Material Division

cc: Edgar Howell, III, Chief - files  
Gil Jensen, Alameda County District Attorney's Office  
H. W. Shephard, Jr., Wells Fargo Bank Trust, P.O. Box  
63700, San Francisco, CA 94163  
Hubert Lenczowski, Knox Ricksen, 1999 Harrison St., Suite  
1700, Oakland, CA 94612-3500  
Enclosures

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0148

RAFAT A. SHAHID, Assistant Agency Director

December 28, 1993

CERTIFIED MAILER #: P 386 338 282

Bill Cox Cadillac  
230 Bay Pl.  
Oakland, 94612  
UGTID: 494

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

**Re: FIVE-YEAR PERMITS FOR OPERATION OF UNDERGROUND STORAGE TANK(S)  
230 Bay Pl. Oakland, 94612**

Dear Owner/Operator:

According to our records your facility referenced above has not received a five-year permit to operate UST's. In order to obtain a permit you must complete the following items marked below and return them within 30 DAYS. The necessary forms are enclosed. You may complete a "Consolidated Underground Tank Management Plan" which will assist you in preparing a monitoring plan, site plot plan and spill response plan for your tank(s). If supplemental information or forms are required, please submit it to this office with the completed questionnaire and application forms:

- \_\_\_ 1. An accurate and complete plot plan.
- \_\_\_ 2. A written spill response plan. (enclosed)
- \_\_\_ 3. A written tank monitoring plan. (enclosed)
- \_\_\_ 4. Results of precision tank test(s), (initial and annual).
- \_\_\_ 5. Results of precision pipeline leak detector tests (initial and annual).
- \_\_\_ 6. Complete UST PERMIT FORM A-one per facility. (enclosed)
- \_\_\_ 7. Complete UST PERMIT FORM B-one per tank. (enclosed)
- \_\_\_ 8. Complete UST PERMIT FORM C-one per tank if information is available. (enclosed)
- \_\_\_ 9. Letter stating how the tank is to be maintained during one year closure.

Be advised that Title 23 of the California Code of Regulation prohibits the operation of "ANY" UST without a permit. If our records are in error, you must contact this office immediately TO AVOID POSSIBLE ENFORCEMENT ACTION. Please feel free to contact this office at (510) 271-4320; to answer any questions which may arise in completing the mandatory five-year permit process. Be prepared to provide your zip code to speak with the Hazmat Specialist handling your case.

Sincerely,

*Brian M. Oliva*

Brian Oliva  
HazMat Specialist

c: Edgar Howell, Chief, Hazardous Materials Div. (files)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0148

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

December 15, 1992  
STID 494

Bill Cox Cadillac & Buick  
ATTN: Bill Theuringer  
230 Bay Pl.  
Oakland, CA 94612

Re: 230 Bay Pl., Oakland, CA 94612

Dear Bill Theuringer:

This office has a Tank Closure Report dated November 13, 1992 by PES Environmental, Inc. of an underground storage tank removal performed at the above referenced site on September 24, 1992. The following comments are to be considered:

1. This particular tank site does not have a significant contamination problem and therefore should be considered as not requiring further action.
2. However, a letter from this office dated December 28, 1990 requested that a soil and groundwater investigation be conducted pursuant to the removal of a waste oil tank on the same site.
3. To date, no plan to address the contamination of 150 ppm TPHd in soil or 2100 ppb TPHd and 550 ppb TPHg in water has been submitted to this office.
4. It is clear that petroleum hydrocarbon in groundwater (as mentioned above) at the above site require a soil and groundwater investigation.

I have enclosed the document, Workplan for Initial Subsurface Investigation, a guidance document published by the Regional Water Quality Control Board (RWQCB). Please be advised this office is working in conjunction with the RWQCB to oversee the remediation of hydrocarbon contaminated sites such as these. The RWQCB is the agency entrusted to protect the waters of the state.

Please submit a workplan for soil and groundwater investigation as described in the above document to this office within sixty (60) days of this letter.

Bill Cox Cadillac  
STID # 494  
December 15, 1992  
Page 2 of 2

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

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

Sincerely,



Thomas F. Peacock, Supervising HMS  
Hazardous Material Division

cc: R. Hiett, RWQCB  
Edgar Howell, Chief - File  
H.W. Shephard, Jr., Wells Fargo Bank Trust, P.O. Box  
63700, San Francisco, CA 94163  
Enclosures

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0148

September 19, 1990

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

George Moss  
Pat Patterson Cadillac  
230 Bay Pl.  
Oakland, CA 94612

Re: Waste Minimization Assessment

Dear George Moss:

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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0148

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

June 18, 1990

Bill Cox Cadillac  
230 Bay Place  
Oakland, CA 94612

Attn: Bob Grande & Bill Theuringer

**RE: 5 Year Underground Storage Tank Permit Requirements**

Dear Mr. Grande,

This is a follow up letter to the underground storage tank inspection performed by Paul Smith, Hazardous Materials Specialist on 6/8/90 at the above facility.

The following violations of the CA code of Regulations, Title 23, Chapter 3, Subchapter 16 Underground Storage Tank Regulations and CA Health and Safety Code were found:

No daily inventory reconciliation monitoring was being conducted.

No quarterly monitoring reports are being submitted to this office.

No written monitoring plan exists describing the inventory reconciliation procedure implemented by your facility.

You are requested to notify this department, in writing, by July 16, 1990 of the corrective actions to rectify the above issues. If you have any questions concerning this matter please contact Paul Smith at 271-4320.

Sincerely,

A handwritten signature in cursive script, appearing to read "Edgar B. Howell III".

Edgar B. Howell III, Chief  
Hazardous Materials Division

EBH:PMS:pms

CC:

Gil Jensen, Alameda County District Attorney, Office of Consumer  
and Environmental Protection