

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0164

Stid 4118

September 30, 1999

Mr. Karniel Lang
Ras-Co Manufacturing Company
413 West Sunset Blvd.
Hayward, CA 94541

ENVIRONMENTAL HEALTH SERVICES

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

RE: 413 West Sunset Blvd., Hayward, CA

Dear Mr. Lang:

I am in receipt of "Groundwater Monitoring Well Installation Report" dated August 5th, 1999 regarding the above referenced site, submitted by Jeff. J. Farhoomand of Tank Protect Engineering. According to this report the soil concentrations for TPHG, BTEX, and MTBE are all below detection limit of 0.50 ppb, except TPHG at <50 ppb for both MW-1 and AW wells.

The concentration of MTBE was revealed at <0.50ppb from 1200ppb indicated previously. Please explain such drastic reduction regarding this decrease in the concentration of MTBE in the AW well.

Additionally please test for the presence of all oxygenated contaminants such as TAME, DIPE, TBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents per my previous letter dated July 15th, 1999. I believe that Mr. Travis might have indicated that the testing for all the oxygenates has already been accomplished previously. However, I have not received a copy of the analytical results. Therefore, please submit the analytical results for all the oxygenates along with the next round of groundwater monitoring report due by November 5th, 1999.

Please inform me if you need additional time to complete the required report.

If you have any questions, please do not hesitate to call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Jeff J. Farhoomand, Tank Protect Engineering, 2821 Whipple Rd., Union City,
CA, 94587-1233
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

STD 4118

September 28, 1999

Mr. Karniel Lang
Ras-Co Manufacturing Company
413 West Sunset Blvd.
Hayward, CA 94541

RE: Property at 413 West Sunset Blvd., Hayward, CA

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Lang:

I sent you a letter regarding the landowner notification and participation requirements. I explained about the law and its requirements. Additionally I enclosed "Sample Letter 2" and "Sample Letter 3", which had to be properly filled out by you and submitted to our office. However, the Sample Letters were not properly filled out.

Enclosed please find the sample letters. Fill them out properly and resubmit to this office.

Please call me at (510)-567-6876, if you have any questions.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB

Attachments: Sample letter 2 and Sample letter 3, which must be filled out by the Responsible Party and mailed to Alameda County.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0164

Stid 4118

July 15, 1999

Mr. Karniel Lang
Ras-Co Manufacturing Company
413 West Sunset Blvd.
Hayward, CA 94541

ENVIRONMENTAL HEALTH SERVICES

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

RE: 413 West Sunset Blvd., Hayward, CA

Dear Mr. Lang:

I am in receipt of the faxed copy of the latest analytical report dated June 20th, 1999 regarding the above referenced site, submitted by Mr. Lewis Travis of Tank Protect Engineering. Per Mr. Travis's request I am extending the compliance date to August 6th, 1999 regarding the requirements at the above referenced site. Please address the following in the required report by the new set deadline:

1. Submittal of the updated monitoring results from monitoring well and the existing agricultural well indicating the present status of the site regarding all contaminants.
2. Testing for the presence of all oxygenated contaminants such as TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents.
3. Indication of ground water gradient direction on a site map.

I believe that Mr. Travis indicated that the testing for all the oxygenates has been accomplished previously. However, I have not received a copy of the analytical results. Therefore, please submit the analytical results for all the oxygenates along with the complete required report by August 6th, 1999. Please inform me if you need additional time to complete the required report.

This is a formal request for technical information and hence any delays should be requested in writing.

Please call me at (510) 567-6876, if you have any questions.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Lewis Travis, Tank Protect Engineering, 2821 Whipple Rd., Union
City, CA, 94587-1233
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0164

Stid 4118

~~July~~
JUNE
July 2, 1999

ENVIRONMENTAL HEALTH SERVICES

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

Mr. Karniel Lang
Ras-Co Manufacturing Company
413 West Sunset Blvd.
Hayward, CA 94541

RE: 413 West Sunset Blvd., Hayward, CA

Dear Mr. Lang:

Per your request and letter dated June 2nd, 1999 by Mr. Lewis Travis of Tank Protect Engineering, your consultant, I am extending the compliance date to July 15th, 1999 regarding the requirements at the above referenced site. As we discussed the following must be accomplished by the new set deadline:

1. Installment of the monitoring well as specified in your work plan
2. Submittal of the updated monitoring results from monitoring well and the existing agricultural well indicating the present status of the site regarding all contaminants.
3. Testing for the presence of all oxygenated contaminants such as TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents.
4. Indication of ground water gradient direction on a site map.

Additionally, per our discussion, the testing for presence of all oxygenates need to be performed only once. Please send a copy of this test result if this has already been performed on the agricultural well present on the site.

Please comply with The above items by July 15, 1999.

This is a formal request for technical information and hence any delays should be requested in writing.

Do not hesitate to call me at (510) 567-6876, should you have any questions.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Lewis Travis, Tank Protect Engineering, 2821 Whipple Rd., Union
City, CA, 94587-1233
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20164

Stid 4118

May 13, 1999

Mr. Karniel Lang
Ras-Co Manufacturing Company
413 West Sunset Blvd.
Hayward, CA 94541

ENVIRONMENTAL HEALTH SERVICES

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

Notice of Violation

RE: 413 West Sunset Blvd., Hayward, CA

Dear Mr. Lang:

I have attempted to inform you of your legal obligations regarding the above referenced site through several written and verbal correspondences. The letters dated December 2nd, 1998 and March 22, 1999 both informed you of several mandatory legal requirements, which must be complied with. However, to this date, this office has not received any correspondence from you regarding the above issues. As you recall the following issues must be addressed:

1. Installment of the monitoring well as specified in your work plan
2. Submittal of the updated monitoring results from monitoring well and the existing agricultural well indicating the present status of the site regarding all contaminants
3. Testing for the presence of all oxygenated contaminants such as TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents.
4. Indication of ground water gradient direction on a site map.

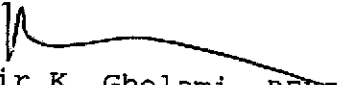
The above items must be addressed within 30 days from the date of this letter or by June 14, 1999.

This is a formal request for soil and groundwater investigation pursuant to Section 2725(a) of Title 23 California Code of Regulations. Section 13267(b) of the California Water Code and Regional Water Quality Control Board (RWQCB) can impose up to \$1000.00 per day for each day of this violation.

This is a formal request for technical information and hence any delays should be requested in writing. Failure to respond can result in referral of the case to the Alameda County District Attorney's Office for an enforcement action.

If you have any questions, do not hesitate to call me at (510) 567-6876.

Sincerely,


Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Jeff Farhoomand, Principal Engineer, Tank Protect Engineering,
2821 Whipple Rd., Union City, CA, 94587-1233
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 164

Stid 4118

March 15, 1999

Mr. Karniel Lang
Ras-Co Manufacturing Company
413 West Sunset Blvd.
Hayward, CA 94541

RE: 413 West Sunset Blvd., Hayward, CA

Dear Mr. Lang:

Having reviewed the above referenced case, I sent you a letter on December 22, 1998. In that letter I brought it to your attention that you have not installed the monitoring well as specified in your work plan submitted previously. I also indicated that you have not submitted any monitoring report since March 12, 1996. Additionally, I requested the following items to be addressed:

- Installment of the monitoring well as specified in your work plan
- Submittal of the updated monitoring results from monitoring well and the existing agricultural well indicating the present status of the site regarding all contaminants
- Testing for the presence of all oxygenated contaminants such as TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents.
- Indication of ground water gradient direction on a site map.

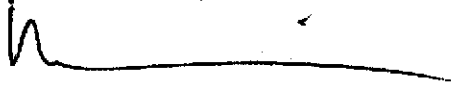
To this date, this office has not received any correspondence from you regarding the above issues. Please respond to the above items within 30 days from the date of this letter by April 15, 1999.

This is a formal request for technical information and hence any delays should be requested in writing.

If you have any questions, Please do not hesitate to call me at (510)-567-6876.

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

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Jeff Farhoomand, Principal Engineer, Tank Protect Engineering,
2821 Whipple Rd., Union City, CA, 94587-1233
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



20164

Stid 4118

December 22, 1998

Mr. Karniel Lang
Ras-Co Manufacturing Company
413 West Sunset Blvd.
Hayward, CA 94541

RE: 413 West Sunset Blvd., Hayward, CA

Dear Mr. Lang:

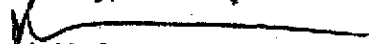
This office has assigned me to review the above referenced site. After a review of the case, it has come to my attention that you have not installed the monitoring well as specified in your work plan submitted previously. In addition you have not submitted any monitoring report since March 12, 1996. Please address the following:

1. **Installation of the monitoring well**
2. **Submittal of the updated monitoring results from monitoring well and the existing agricultural well indicating the present status of the site regarding all contaminants**
3. **According to Cal /EPA's guidelines and Chuck Headlee of Regional Water Quality Control Board (RWQCB) you need to test for the presence of all oxygenated contaminants such as TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents.**
4. **Indicate ground water gradient direction on a site map.**

Please respond to the above items within 30 days from the date of this letter. This is a formal request for technical information and hence any delays should be requested in writing.

If you have any questions, please call me at (510) 567-6876.

Sincerely,


Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Jeff Farhoomand, Principal Engineer, Tank Protect Engineering, 2821 Whipple Rd., Union City, CA, 94587-1233
files

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Ro # 164

RAFAT A. SHAHID, DIRECTOR

StId 4118

February 15, 1996

Karniel, Oscar, and Mildred Lang
Ras-Co Manufacturing Company, Inc
413 W Sunset Blvd
Hayward CA 94541

DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

Subject: Workplan for investigations at 413 West Sunset Blvd., Hayward

Dear Messrs. and Ms. Lang:

This office has reviewed Tank Protect Engineering of Northern California, Inc.'s (TPE) work plan, dated February 8, 1996. This work plan proposes to install one groundwater monitoring well in the assumed downgradient location approximately 10 feet west of the former underground storage tank (UST) pit at the subject site. This work plan is acceptable to this office with the following comments/additions:

- There is a domestic well located along the northwest side of this site. Please supply this office with any information that may be available on this well, including type of use and construction logs. Groundwater should be sampled and analyzed from this well using appropriate sampling protocols.
- The installation of one monitoring well may *not* be sufficient to delineate the lateral extent of groundwater contamination at this site. Be advised that if elevated levels of petroleum hydrocarbons are detected in samples collected from the proposed monitoring well or the on-site domestic well, then you may be required to further define the lateral extent of groundwater contamination. As we discussed during our telephone conversation on February 5 and 15, 1996, in addition to the proposed monitoring well, you may want to include additional sample locations during this phase of investigations to assist in confirming the extent of groundwater contamination.
- All groundwater samples should be analyzed for TPHg, BTEX, and Methyl Tertiary Butyl Ether (MTBE). (See the attached memo for MTBE reporting requirements.)
- Please check with the State Trust Fund regarding their requirements for obtaining three bids prior to completing proposed work.

As we discussed, if you submit documentation confirming a completion date for these investigations to this office *in writing* by February 26, 1996, then it may be appropriate to cancel the Pre-Enforcement Panel Review scheduled on February 28, 1996.

Please notify this office at least 72 hours before field work begins. If you have questions, please call me at (510)567-6755 or Eva Chu at (510)567-6762 between February 20 - 23, 1996.

Sincerely,

Amy Leech
Hazardous Materials Specialist

a
ATTACHMENT

c: Tank Protect Engineering, 2821 Whipple Rd., Union City CA 94587
Gordon Coleman-File(ALL)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0#164

ARNOLD PERKINS, DIRECTOR
RAFAT A. SHAHID, DEPUTY DIRECTOR

StId 4118

January 18, 1996

Karniel Lang and Oscar Lang
Ras-Co Manufacturing
413 W Sunset Blvd
Hayward Ca 94541

Alameda County Environmental Health Dept.
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577
(510)567-6700 fax: (510)337-9335

FINAL NOTICE OF VIOLATION

Subject: Required investigations at Ras-Co Manufacturing, 413 W Sunset Blvd.,
Hayward, CA 94541

Dear Messrs. Lang:

On December 6, 1994 and August 23 and October 17, 1995, the Alameda County Department of Environmental Health sent you a letter requiring that you submit a Preliminary Site Assessment work plan to determine the vertical and lateral extent of soil and ground water contamination from past releases from the former underground storage tanks (USTs) at the subject site. Please see attached a copy of that letter. On March 31 and June 12, 1995, this office witnessed over excavation of soil and confirmatory sampling in the former UST excavation. To this date, however, we have not received any reports documenting this work or a Preliminary Site Assessment work plan that proposes to investigate the vertical and lateral extent of soil and ground water contamination at the subject site. Therefore, this letter constitutes a Notice that you are in violation of specific laws to investigate and remediate this site.

Failure to furnish technical reports regarding documented or potential ground water contamination violates Section 13267 (b) of the California Water Code. The Regional Water Quality Control Board (RWQCB) can impose civil penalties of up to \$1,000 per day for each day in which this violation occurs.

You are required to submit a Preliminary Site Assessment work plan and a report documenting the over excavation work that has been completed and the fate of all excavated soil from this site within 10 days of the date of this letter, or by January 29, 1996. Failure to respond will result in referral of this case to the RWQCB or Alameda County District Attorney's Office to consider for enforcement action. Modifications of required tasks or extensions of stated deadlines must be confirmed in writing by either this agency or RWQCB.

A Cleanup Fund administered by the State of California Water Resources Control Board is available for the cleanup of properties that have been impacted by leaky USTs. The Cleanup Fund pays for corrective action to clean up soil and groundwater contamination caused by leaky USTs after a deductible has been paid by the applicant. Again, if you have not already done so, I encourage you to apply for financial assistance with the State UST Cleanup Fund.

Lang
Re: 413 W Sunset Blvd
January 18, 1996
Page 2 of 2

Please contact me at (510)567-5655 if you have any questions.

Sincerely,



Amy Leech
Hazardous Materials Specialist

ATTACHMENT



c: Kevin Graves, RWQCB
Gil Jensen, Alameda County District Attorney's Office
Acting Chief of Environmental Protection - Files(ALL)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0164

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

STID 4118

October 17, 1995

Karniel and Oscar Lang
Ras-Co Manufacturing
413 W Sunset Blvd
Hayward CA 94541

Subject: Required investigations at 413 W Sunset Blvd, Hayward, CA

Dear Messrs. Lang:

Per your request, please find attached the letter sent to you from this office dated December 6, 1994. This letter requests the submittal of a work plan for a Preliminary Site Assessment to investigate the extent of petroleum hydrocarbon contamination to soil and groundwater at the subject site. As we discussed during our telephone conversation on October 16, 1995, you may want to review this letter and discuss the requirements with your consultant. As I indicated yesterday, a report of investigations conducted thus far should be submitted along with the work plan for a Preliminary Site Assessment no later than November 27, 1995.

Please do not hesitate to call me at (510)567-6755 if you have questions or need additional information.

Sincerely,

A handwritten signature in cursive script that reads "Amy Leech".

Amy Leech
Hazardous Materials Specialist

ATTACHMENT

c: Acting Chief of Environmental Protection - File(ALL)



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

StId 4118

August 23, 1995

Karniel Lang and Oscar Lang
Ras-Co Manufacturing
413 W Sunset Blvd
Hayward Ca 94541

NOTICE OF VIOLATION

Subject: Required investigations at Ras-Co Manufacturing, 413 W Sunset Blvd, Haward, CA 94541

Dear Mr. Lang:

On December 6, 1994, the Alameda County Department of Environmental Health, sent you a letter requiring that you submit a Preliminary Site Assessment work plan to determine the vertical and lateral extent of soil and ground water contamination from past releases from the former underground storage tanks (USTs) at the subject site. Please see attached a copy of that letter. On March 31 and June 12, 1995, this office witnessed over excavation of soil and confirmatory sampling in the former UST excavation. To this date, however, we have not received any reports documenting this work or a Preliminary Site Assessment work plan that proposes to investigate the vertical and lateral extent of soil and ground water contamination at the subject site. Therefore, this letter constitutes a Notice that you are in violation of specific laws to investigate and remediate this site.

Failure to furnish technical reports regarding documented or potential ground water contamination violates **Section 13267 (b) of the California Water Code**. The Regional Water Quality Control Board (RWQCB) can impose civil penalties of up to **\$1,000 per day** for each day in which this violation occurs.

You are required to submit a Preliminary Site Assessment work plan and a report documenting the fate of all excavated soil from this site **within 30 days** of the date of this letter. Failure to respond will result in referral of this case to the RWQCB or Alameda County District Attorney's Office to consider for enforcement action. Modifications of required tasks or extensions of stated deadlines must be confirmed in writing by either this agency or RWQCB.

A Cleanup Fund administered by the State of California Water Resources Control Board is available for the cleanup of properties that have been impacted by leaky USTs. The Cleanup Fund pays for corrective action to clean up soil and groundwater contamination caused by leaky USTs after a deductible has been paid by the applicant. Again, if you have not already done so, I encourage you to apply for financial assistance with the State UST Cleanup Fund. Please find enclosed information and telephone numbers for the Cleanup Fund.

Lang

Re: 413 W Sunset Blvd

August 23, 1995

Page 2 of 2

Please contact me at (510)567-5655, if you have any questions or comments.

Sincerely,



Amy Leech

Hazardous Materials Specialist

ATTACHMENT

c: Kevin Graves, RWQCB
Gil Jensen, Alameda County District Attorney's Office
Acting Chief of Environmental Protection - Files(ALL)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0164

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

StId #4118

December 22, 1994

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

Oscar Lang
Ras-Co Manufacturing
413 W Sunset Blvd
Hayward CA 94541

Subject: Tank Closure Report and Workplan for investigations at
413 W Sunset Blvd, Hayward, CA 94541

Dear Mr. Lang:

This office has reviewed Tank Protect Engineering's Tank Closure Report and Workplan dated December 16, 1994.

The Tank Closure Report and Workplan are acceptable. Please be aware, however, the workplan submitted addresses only soil and not groundwater investigations. Information obtained from the soil investigation will assist in determining groundwater investigative action.

If you have questions please call me at (510)567-6755. Also, please notify this office at least 48 hours before work begins.

Sincerely,

A handwritten signature in cursive script that reads "Amy Leech".

Amy Leech

cc: Louis Travis III
Tank Protect Engineering
of Norther California, Inc.
2821 Whipple Rd
Union City CA 94587

Ed Howell:File(ALL)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0164

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

StId 4118

December 6, 1994

Oscar Lang
Ras-Co Manufacturing
413 W Sunset Blvd
Hayward Ca 94541

Subject: Required investigations at 413 W Sunset Blvd, Hayward,
California

Dear Mr. Lang:

This office has received and reviewed Trace Analysis Laboratory, Inc.'s soil sample results, dated November 18, 1994.

On November 10, 1994, two underground storage tanks (UST) were removed from the subject site: one 250 gallon UST and one 500 gallon UST. Lab analysis results for soil samples collected from the UST pit identified contaminant levels as high as 5,000 parts per million (ppm) Total Petroleum Hydrocarbons as gasoline (TPHg), 8,900 parts per billion (ppb) benzene, 330,000 ppb toluene, 96,000 ppb ethylbenzene, and 620,000 ppb xylenes.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that soil and ground water investigations be conducted when there is evidence to indicate that a release from an UST will impact or may have impacted the ground water.

You are required to conduct a Preliminary Site Assessment (PSA) to determine the lateral and vertical extent and severity of both soil and ground water contamination resulting from the release at the site. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, and be consistent with requirements set forth in Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached Appendix A. The major elements of the guidelines include, but are not limited to, the following:

Lang
Ras-Co Manufacturing
December 6, 1994
page 2 of 4

- o At least one permanent ground water monitoring well must be installed within 10 feet of the observed soil contamination, oriented in the confirmed downgradient direction relative to groundwater flow. In the absence of neighboring monitoring wells located within 100 feet of the site, or any other data identifying the confirmed downgradient direction, a minimum of three wells will be required to verify gradient direction. During the installation of these wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology.

- o Subsequent to the installation of the monitoring wells, these wells must be **surveyed to an established benchmark**, (i.e., Mean Sea Level) with an accuracy of 0.01 foot. Ground water samples are to be collected and analyzed quarterly, and water level measurements are to be **collected monthly for the first three months**, and then quarterly thereafter. If the initial ground water elevation contours indicate that ground water flow directions vary greatly then you will be required to continue monthly water level measurements until the ground water gradient behavior is known. **Both soil and ground water samples must be analyzed for TPHg and BTEX.**

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. The RWQCB may choose to take over as lead agency if it is determined, following the completion of the initial assessment, that there has been a substantial impact to ground water.

In order to properly conduct a site investigation, you are required to obtain professional services of a reputable environmental consultant. **All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.**

The PSA proposal is due within 60 days of the date of this letter. Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for final RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter.

Lang
Ras-Co Manufacturing
December 6, 1994
page 3 of 4

The referenced initial and quarterly reports must describe the status of the investigation and must include, among others, the following elements:

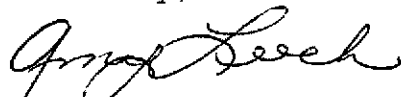
- o Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of ground water contamination characterization.
- o Interpretations of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations or plans for additional investigative work or remediation.

Please be advised that this is a formal request for a work plan pursuant to **Section 2722 (c)(d) of Title 23 California Code of Regulations**. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

Additionally, you are required to submit documentation for the fate of excavated soil as a result of excavating the USTs. **This documentation must be submitted within 15 days** of the date of this letter.

If you have any questions or comments, please contact me at (510) 567-6755.

Sincerely,



Amy Leech
Hazardous Materials Specialist

ATTACHMENT

Lang
Ras-Co Manufacturing
December 6, 1994
page 3 of 4

cc: Edgar Howell

lop\4118.lop

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0164

RAFAT A. SHAHID, Assistant Agency Director

December 2, 1993

Mr Karniel Lang
Ras-Co Mfg Co
413 W Sunset Blvd
Hayward CA 94541

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

Re: FIVE-YEAR PERMIT FOR OPERATION OF ONE UNDERGROUND STORAGE
TANKS (UST'S) AT 413 W SUNSET BLVD HAYWARD CA

Dear Mr Lang:

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 to provide monitoring plan, plot plan and spill response plan information. If additional 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. Please feel free to contact me at (510) 271-4320; if any questions arise in completing the mandatory five-year permit process.

Sincerely,


Kevin Finsley
Hazardous Materials Specialist

c: Edgar Howell, Chief, Hazardous Materials Division (KT-files)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

R0164

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

June 12, 1992

Karniel Erik Lang
Ras-Co Manufacturing Co.
413 Sunset Blvd.
Hayward, Ca 94541

Re: **FIVE-YEAR PERMITS FOR OPERATION OF TWO
UNDERGROUND STORAGE TANKS (UST'S) AT 413
SUNSET BLVD HAYWARD**

According to our records the above mentioned facility has not received a five-year permit to operate UST's. Please complete the following items marked below and return them to me within 30 days. The example plans enclosed, should be used only as guidelines and may not meet your requirements under Title 23.

- 1. Complete UST PERMIT FORM A-one per facility. (enclosed)
- 2. Complete UST PERMIT FORM B-one per tank. (enclosed)
- 3. Complete UST PERMIT FORM C-one per tank if information is available. (enclosed)
- 4. A written tank monitoring plan. (enclosed)
- 5. Results of precision tank test(s) (initial and annual).
- 6. Results of precision pipeline leak detector tests (initial and annual).
- 7. An accurate and complete plot plan. (enclosed)
- 8. A written spill response plan. (enclosed)

Title 23 of the California Code of Regulation prohibits the operation of ANY UST without a permit. Please feel free to contact Amir K. Gholami at (510) 271-4320, if you have any questions which may arise in completing the mandatory five-year permit process.

Sincerely,

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

Ravi Arulanantham
Senior Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney
Rafat Shahid, Assistant Agency Director, Alameda County
Department of Environmental Health



June 4, 1990

Karniel Lang
Ras-Co Manufacturing
413 W. Sunset Blvd.
Hayward CA 94541

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

NOTICE OF VIOLATION

Dear Mr. Lang:

On January 31, 1990, Pamela Evans of the Alameda County Department of Environmental Health, Hazardous Materials Division, inspected your premises. During this inspection, Ms. Evans noted the following violations of the California Health and Safety Code and California Code of Regulations, Title 23:

1. Sections 2640 (a) and 2644 (a), CCR - No guaging or precision testing of the 500 gallon underground fuel tank is being carried out. Underground tanks storing hazardous materials must be monitored in order to detect unauthorized releases.
2. Section 25298, (H&SC) - A 250 gallon fuel tank on the property has not been in use for the past year. Unused underground storage tanks must be removed or monitored.
3. Sections 25504 (a) and 25509 (a) (1), (H&SC) - The Hazardous Materials Business Plan inventory on file for Ras-Co Manufacturing does not include the fuel stored in the underground tanks. Business plan inventories must include a listing for every hazardous material handled. You must provide an amended inventory to this office.

You must submit a written plan of correction to this office by June 15, 1990. The plan must specify the actions to be taken to address each of the above violations and their expected dates of completion. You may contact Hazardous Materials Specialist Pamela Evans with any questions at 271-4320.

Sincerely,

Edgar B. Howell, Chief
Hazardous Materials Division

EBH:PJE

c: Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, Regional Water Quality Control Board
Howard Hatayama, Department of Health Services