

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Handwritten signature and date: JEW 03-22-06

March 17, 2006

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

Gordon Linden
150 La Salle Avenue
Piedmont, CA 94611

George Hill
305 Sheridan Avenue
Piedmont, CA 94611

Dear Mr. Linden and Mr. Hill:

Subject: Fuel Leak Case No. RO000199, Connell Automobile Dealership,
3093 Broadway, Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed "Addendum to Interim Remedial Action Plan" dated December 6, 2005, and "Interim Remedial Action Plan - Addendum #2" dated January 9, 2006, both prepared by Pangea Environmental Services, Inc. (Pangea). These Addendums clarified and modified "Interim Remedial Action Plan" dated November 11, 2004. The Interim Remedial Action Plan with Addendums is approved. We request that you perform the proposed work and send us the technical reports requested below.

OTHER COMMENTS

- 1) Perjury Statement - All work plans, technical reports, or technical documents 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 document or report is true and correct to the best of my knowledge."

This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

ELECTRONIC SUBMITTAL OF REPORTS

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of

Mr. Linden and Mr. Hill

March 17, 2006

Page 2 of 2

reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at don.hwang@acgov.org.

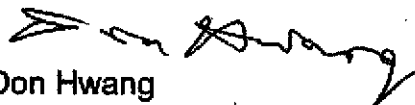
TECHNICAL REPORT REQUEST

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

May 17, 2006 – Interim Remedial Action Report

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

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

C: Bob Clark-Riddell, Pangea Environmental Services, Inc., 64 Sonia Street,
Suite B, Oakland, California 94618
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



out
4-8-05

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

April 7, 2005

Gordon Linden
150 La Salle Avenue
Piedmont, CA 94611

George Hill
305 Sheridan Avenue
Piedmont, CA 94611

Dear Mr. Linden and Mr. Hill:

Subject: Fuel Leak Case No. RO000199, Connell Automobile Dealership,
3093 Broadway, Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed "Interim Remedial Action Plan" dated October 14, 2004, prepared by Pangea Environmental Services, Inc. (Pangea). The "Interim Remedial Action Plan" proposes using dual phase extraction (DPE) with air sparging (AS). We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) "Feasibility Test Report" dated March 16, 2001 by Cambria Environmental Technology (Cambria) - The "Interim Remedial Action Plan" was inconsistent with some of the conclusions of the "Feasibility Test Report".
 - a. "The limited mass removal rate (1-2 pounds/day TPHg) from MW-6 indicates that the short-term DVE with a 5-horsepower blower is not effective for remediating the remaining source material (free product) in well MW-6. Free product historically detected in well MW-6 could be submerged in well MW-6 and not readily accessible to short-term DVE. The short duration of DVE testing and the 2.8 feet of water drawdown may not have been sufficient to access the subsurface zone with historic free product. Please note that the SVE remedial activities on MW-6 conducted by prior consultants may have removed most or all of the free product historically detected near MW-6."

- b. "The limited mass removal rates from MW-14 and MW-15 and lack of significant free product detected in wells MW-14 and MW-15 suggests: 1) there is not a significant source near wells MW-14 and MW-15, or 2) source material is submerged and inaccessible to the short-term DVE efforts conducted during the testing."
- c. "... Air sparging could be performed without SVE in areas like MW2-6 where elevated hydrocarbon vapors were not detected, ... "

Please explain.

OTHER COMMENTS

- 2) Perjury Statement - All work plans, technical reports, or technical documents 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 document or report is true and correct to the best of my knowledge."

This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

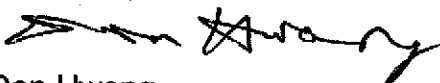
TECHNICAL REPORT REQUEST

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

June 7, 2005 – Response to "Feasibility Test Report" with Perjury Statement

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

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Bob Clark-Riddell, Pangea Environmental Services, Inc., 64 Sonia Street, Suite B, Oakland, California 94618
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

August 11, 2004

Gordon Linden
150 La Salle Avenue
Piedmont, CA 94611

George Hill
305 Sheridan Avenue
Piedmont, CA 94611

Dear Mr. Linden and Mr. Hill:

Subject: Fuel Leak Case No. RO000199, Connell Automobile Dealership, 3093 Broadway, Oakland, CA

Your consultant, Bob Clark-Riddell of Cambria Environmental Technology (Cambria) has made several inquiries to our office requesting approval for the preparation of a feasibility study/corrective action plan (CAP) instead of the preparation of an Interim Remedial Action Plan which was authorized on June 10, 2004 via email. We intend to review your request for the preparation of a CAP within a couple of weeks. After our review for the suitability of a CAP, we will send correspondence including other corrective action tasks that will be required before this case may be closed. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) Free-Phase Product - The continued presence of free-phase product in several of the on-site wells since groundwater monitoring was initiated in 1991 warrants interim remedial action. Manual bailing with absorbent sock or passive skimmer have only been able to remove limited amounts. Vapor extraction was also tried briefly. Mr. Clark-Riddell's email of August 5, 2004 states that Cambria is considering soil vapor extraction with ozone sparging or dual-phase extraction for the site. Mr. Clark-Riddell proposes to not include an evaluation of other alternatives. Prior studies at the site can be used to demonstrate the effectiveness of remedial methods.
- 2) Remediation System Design - Please include in the Interim Remedial Action Plan requested below and submit for approval prior to installation.
- 3) Perjury Statement - All work plans, technical reports, or technical documents submitted to this office must be accompanied by a cover letter from the responsible party that states, at a minimum, the following:

Mr. Linden and Mr. Hill

August 11, 2004

Page 2 of 2

"I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge."

This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

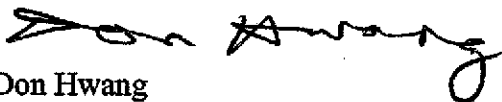
TECHNICAL REPORT REQUEST

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

September 11, 2004 - Interim Remedial Action Plan

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

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Bob Clark-Riddell, Cambria Environmental Technology, Inc., 5900 Hollis St., Suite A,
Emeryville, CA 94608
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



9-24-02

September 23, 2002

RO 199

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

Mr. George Hill
305 Sheridan Avenue
Piedmont, CA 94611

Mr. Gordon Linden
101 Gleneden Avenue
Oakland, CA 94611

Re: Connell Automotive Dealership, 3093 Broadway, Oakland – Request for Interim Remediation Work Plan

Dear Messrs. Hill and Linden:

This office has been in recent contact with Mr. Bob Clark-Riddell of Cambria Environmental Technology (Cambria) regarding the long-term environmental cleanup project at the referenced site. We have also reviewed Cambria's *Feasibility Test Report* dated March 16, 2001.

This office has determined that *interim* remediation is warranted to address the continued presence of free-phase (FP) product in several of the on-site wells; some 13 years after removal of the underground storage tanks. Such interim FP removal is in addition to other corrective action tasks that may eventually be requested by this office as components to a final Corrective Action Plan (CAP). The referenced interim FP removal measures will be in addition to the FP removal measures, e.g., passive skimmers, employed to date.

At this time, you are requested to submit an interim FP remediation work plan. This work plan is due within 30 days of the date of this letter.

Please feel free to call me at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

c: Chuck Headlee, RWQCB
Sunil Ramdass, SWRCB UST Fund
Leroy Griffith, Oakland Fire Department
Paul Kibel, Fitzgerald, Abbot & Beardsley, 1221 Broadway, 21st Fl., Oakland, CA 94612
Bob Clark-Riddell, Cambria Env. Technology, 1144 65th St., Ste. B, Oakland, 94608

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



11-2-00

2099

October 30, 2000

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

Mr. Robert Schultz
Cambria Environmental Technology Inc.
1144 65th Street, Suite B
Oakland, California 94608

**Subject: Proposed Feasibility Testing (Second Run)
Connell Automotive Dealership Facility (STID# 469)
3093 Broadway, Oakland, California 94611**

Dear Mr. Schultz:

Based on our telephone discussion today and last October 24, 2000, you are requesting our office approval to conduct a second run on the feasibility testing of dual - phase soil vapor and groundwater extraction (DVE) using monitoring wells MW-1 and MW-6 at the subject site. Please submit a brief work plan (letter report) which should include the following items:

- Rationale for conducting a second run
- Additional information to be collected during the second run
- Results of the initial DVE test run
- Rationale for selection of wells MW-1 and MW-6
- Rationale for conducting the test for forty (40) hours

If you have any questions regarding this letter or the subject site, please call me at (510) 567-6780.

Sincerely,


Susan L. Hugo
Hazardous Materials Specialist

c: Chuck Headlee, San Francisco Bay RWQCB
George Hill, 305 Sheridan Avenue, Piedmont, California 94611
Gordon Linden, 101 Gleneden Avenue, Oakland, California 94611
SH / files

SENT 7-17-2000

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

20199

July 14, 2000

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

Mr. George Hill
305 Sheridan Avenue
Piedmont, California 94611

Mr. Gordon Linden
101 Glenden Avenue
Oakland, California 94611

**Subject: Work Plan Addendum
Connell Automotive Dealership Facility (STID # 469)
3093 Broadway, Oakland, California 94611**

Dear Messrs. Hill and Linden:

This office has reviewed the above referenced work plan addendum, dated May 8, 2000 prepared and submitted by Cambria Environmental Technology Inc., for the subject site.

The elements of the work plan addendum were discussed with Mr. Bob Schultz of Cambria during telephone conversation last May 30, 2000 and was verbally approved provided the following items are addressed:

1. In addition to monitoring wells MW-6, MW-14 and MW-15, monitoring well MW-1 should be included on page 3 for LUFT Metal analysis as listed on Table A. Please confirm if filtered samples were used for metal analysis.
2. Notify our office when field activities are scheduled at the site.

If you have any questions regarding this letter or the subject site, please call me at (510) 567-6780.

Sincerely,

Susan L. Hugo, Hazardous Materials Specialist

c: Chuck Headlee, San Francisco Bay RWQCB
Mark Gomez, City of Oakland Public Works Agency - Environmental Services,
250 Frank H. Ogawa, Plaza, Suite 5301, Oakland, CA 94612
Bob Schultz / Bob Riddell, Cambria, 1144 65th St., Suite B, Oakland, CA 94608
SH / files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20199
ENVIRONMENTAL HEALTH SERVICES

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

June 9, 1999

Mr. George Hill
305 Sheridan Avenue
Piedmont, California 94611

Mr. Gordon Linden
101 Gleneden Avenue
Oakland, California 94611

**RE: Connell Automotive Dealership Facility (STID # 469)
3093 Broadway, California 94611**

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Messrs. Hill and Linden:

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.

LANDOWNER NOTIFICATION

Re: 3093 Broadway, Oakland

June 9, 1999

Page 2 of 2

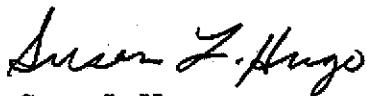
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 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) 567-6780 should you have any questions about the content of this letter.

Sincerely,



Susan L. Hugo
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB
SH / files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



May 3, 1999

R0109

Mr. George Hill
305 Sheridan Avenue
Piedmont, California 94611

Mr. Gordon Linden
101 Gleneden Avenue
Oakland, California 94611

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

Subject: Work Plan -Groundwater Monitoring and Expanded Corrective Action Plan for Connell Automotive Dealership Facility (STID # 469) 3093 Broadway, Oakland, California 94611

Dear Messrs. Hill and Linden:

This office has reviewed the above referenced work plan, dated April 15, 1999, prepared and submitted by Subsurface Consultant, Inc. for the subject site.

The work plan is acceptable provided the following items are addressed:

1. Monitoring wells MW-1, MW-4, MW-6, MW-9, MW-14 and MW-15 should be sampled every quarter if free product is not detected. Samples must be analyzed for Total Petroleum Hydrocarbon (TPH) as gasoline; TPH as diesel; TPH as motor oil; benzene, toluene, ethyl benzene, xylene (BTEX); methyl tertiary butyl ether (MTBE); halogenated volatile organic compounds (HVOCs); semi volatile organic compounds (SVOCs); lead, cadmium, chromium, zinc and nickel.
2. Monitoring wells MW-7, MW-8 and MW-13 must be sampled every quarter and analyzed for target compounds listed in item #1.
3. Monitoring wells MW-2, MW-3, MW-5, MW-10 and MW-11 can be dropped from the monitoring program at this time.

Please notify this office of any field activities at the subject site.

If you have any questions regarding this letter or the subject site, please call me at (510) 567-6780.

Sincerely,

Susan L. Hugo, Hazardous Materials Specialist

- c: Chuck Headlee, San Francisco Bay RWQCB
Mark Gomez, City of Oakland Public Works Agency - Environmental Services,
250 Frank H. Ogawa, Plaza, Suite 5301, Oakland, CA 94612
Jerri Alexander, SCI, 3736 Mt. Diablo Blvd., Suite 200, Lafayette, CA 94549
SH / files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO#199

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

January 25, 1999

Mr. George Hill
305 Sheridan Avenue
Piedmont, California 94611

Mr. Gordon Linden
101 Gleneden Avenue
Oakland, California 94611

**Subject: Corrective Action Requirements for Site Closure
Connell Auto Dealership - 3093 Broadway, Oakland, CA 94611 (STID# 469)**

Dear Messrs. Hill and Linden:

The Alameda County Department of Environmental Health (ACDEH) has met with you, Mr. Charles Headlee of the Cal/EPA San Francisco Bay Regional Water Quality Control Board (RWQCB), Mr. Mark Gomez of the City of Oakland, and members of Subsurface Consultants, Inc. to discuss the proposed corrective actions for the subject site. This letter documents the decisions made during our four meetings (July 13, August 18, October 1, and October 8, 1998), including the regulatory requirements that will facilitate moving the subject site towards closure.

Our office is the lead agency overseeing the investigation and remediation at the Connell Site. Case closure recommendation for the site is submitted to the RWQCB for concurrence. Recently, City of Oakland has been requested to participate in the meetings since the site is being considered as a "pilot site" to utilize the City of Oakland's Urban Land Redevelopment (Oakland's ULR) Program Risk Based Screening Level (RBSL) criteria.

As you know, additional subsurface investigation was conducted in May 1998 to further delineate the extent of free product within the permeable sand and gravel layers beneath the site building and near the former UST/product line source area. Seven soil borings were drilled to depths ranging from 27 to 40 feet below ground surface (bgs) and two monitoring wells (MW-14 and MW-15) were installed inside the building. One shallow soil sample collected from boring F at 0.5 feet bgs showed up to 25,000 ppm Total Volatile Hydrocarbons (TVH). Deeper soil samples collected from boring F at 6.0 to 21 feet bgs showed no detectable level of petroleum hydrocarbon with the exception of benzene (24 ppb) and 1,2 DCA (48 ppb) found at 21 feet bgs. Groundwater samples collected from well (MW-15) inside the building showed up to 130,000 ppb TVH; 1,700 ppb Total Extractable Hydrocarbons (TEH); 30,000 ppb benzene; 38,000 toluene; 2,500 ppb ethylbenzene; 12,600 ppb xylene and 1,200 ppb 1,2-DCA. Monitoring well MW-14 which is also located inside the building detected up to 41,000 ppb TVH; 7,700 ppb

Mr. George Hill
Mr. Gordon Linden
January 25, 1999
Page 2 of 3

TEH; 7,100 ppb benzene; 11,000 ppb toluene; 720 ppb ethyl benzene; 3,900 ppb xylene and 440 ppb 1,2 DCA. Grab water sample collected from boring G (drilled outside the building) found up to 590,000 ppb TVH; 35,000 ppb TEH; 15,000 ppb benzene; 25,000 ppb toluene; 2100 ppb ethyl benzene; 10,800 ppb xylene and 880 ppb 1,2 DCA.

Based on the data collected for the site, the presence of free product and dissolved constituents in individual wells appears to be dependent on the presence of permeable sand and gravel layers within the screened interval of the wells. The permeable channel deposits found beneath the site appears to act as a preferential pathway for the migration of the product plume.

As we have discussed during the meetings, this agency in conjunction with the San Francisco Bay Regional Water Quality Control Board (RWQCB) will consider using the City of Oakland's Urban Land Redevelopment (Oakland's ULR) Program Risk Based Screening Level (RBSL) criteria for the subject site. A risk-based clean up action for the site is acceptable provided the following criteria are addressed in the Corrective Action Plan (CAP):

- 1) Primary source of contamination including free product found in the groundwater has been removed.
- 2) Extent of the soil and /or groundwater contamination has been adequately characterized.
- 3) The dissolved hydrocarbon plume is stable and not migrating.
- 4) No water wells, 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 and the environment. Residual contamination in soil and groundwater does not pose a risk to human health or the environment.

Our office understands that the last criterion will be satisfied by using the City of Oakland's Urban Land Redevelopment (ULR) Program Risk Based Screening Level (RBSL) criteria. As a result, an expanded CAP will be required that will incorporate the following necessary elements of the ULR program:

- Geotechnical laboratory testing of two soil samples to confirm that soils beneath the site satisfy the ULR criteria; specific tests shall include grain size distribution (sieve analysis with hydrometer), porosity, moisture content, and specific yield;

Mr. George Hill
Mr. Gordon Linden
January 25, 1999
Page 3 of 3

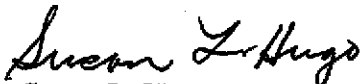
- Risk Management Plan (RMP) to manage residual contamination left at the site. ACDEH and City of Oakland Building and Planning Department should be notified prior to any construction, redevelopment and / or change in land use at the site.
- Upon direction of the regulatory agencies, appropriate abandonment of the monitoring wells prior to issuance of Site closure.

Our office also requires that the following specific actions be performed at the site and included in the CAP:

- Evaluation of the presence of preferential pathways such as utility lines or trenches along Broadway for the contaminant plume to migrate off-site.
- Free product recovery must be continued at the site as previously specified in our letter dated January 26, 1998; your proposal to install a passive product skimmer in well MW#6 and an absorbent "sock" in well MW#1 is acceptable.
- Groundwater monitoring should be continued as previously specified in the County's January 26, 1998 letter. The two monitoring wells MW-14 and MW-15 should be included in the groundwater-monitoring program. Any changes or modifications must have approval from this office.

In summary, the CAP must address the regulatory agency criteria described above. The site will be evaluated for closure when all the criteria described above have been met. During that time, the need for a deed notification will be evaluated as a condition of site closure. If you have any questions concerning this letter or the subject site, please call me at (510) 567-6780.

Sincerely,



Susan L. Hugo, Hazardous Materials Specialist

c: Mee Ling Tung, Director, Environmental Health
Dick Pantages, Chief, Environmental Health Protection Division
Steve Morse / Ravi Arulanantham, Cal/EPA San Francisco Bay RWQCB
Charles Headlee, Cal/EPA San Francisco Bay RWQCB
Mark Gomez, City of Oakland Public Works Agency - Environmental Services
250 Frank H. Ogawa Plaza, Suite 5301, Oakland, CA 94612
Jerri Alexander / Meg Mendoza, SCI, 3736 Mt. Diablo Blvd., Suite 200, Lafayette, CA 94549
SH / files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Ro# 199

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

January 25, 1999

Mr. George Hill
305 Sheridan Avenue
Piedmont, California 94611

Mr. Gordon Linden
101 Gleneden Avenue
Oakland, California 94611

**Subject: Corrective Action Requirements for Site Closure
Connell Auto Dealership - 3093 Broadway, Oakland, CA 94611 (STID# 469)**

Dear Messrs. Hill and Linden:

The Alameda County Department of Environmental Health (ACDEH) has met with you, Mr. Charles Headlee of the Cal/EPA San Francisco Bay Regional Water Quality Control Board (RWQCB), Mr. Mark Gomez of the City of Oakland, and members of Subsurface Consultants, Inc. to discuss the proposed corrective actions for the subject site. This letter documents the decisions made during our four meetings (July 13, August 18, October 1, and October 8, 1998), including the regulatory requirements that will facilitate moving the subject site towards closure.

Our office is the lead agency overseeing the investigation and remediation at the Connell Site. Case closure recommendation for the site is submitted to the RWQCB for concurrence. Recently, City of Oakland has been requested to participate in the meetings since the site is being considered as a "pilot site" to utilize the City of Oakland's Urban Land Redevelopment (Oakland's ULR) Program Risk Based Screening Level (RBSL) criteria.

As you know, additional subsurface investigation was conducted in May 1998 to further delineate the extent of free product within the permeable sand and gravel layers beneath the site building and near the former UST/product line source area. Seven soil borings were drilled to depths ranging from 27 to 40 feet below ground surface (bgs) and two monitoring wells (MW-14 and MW-15) were installed inside the building. One shallow soil sample collected from boring F at 0.5 feet bgs showed up to 25,000 ppm Total Volatile Hydrocarbons (TVH). Deeper soil samples collected from boring F at 6.0 to 21 feet bgs showed no detectable level of petroleum hydrocarbon with the exception of benzene (24 ppb) and 1,2 DCA (48 ppb) found at 21 feet bgs. Groundwater samples collected from well (MW-15) inside the building showed up to 130,000 ppb TVH; 1,700 ppb Total Extractable Hydrocarbons (TEH); 30,000 ppb benzene; 38,000 toluene; 2,500 ppb ethylbenzene; 12,600 ppb xylene and 1,200 ppb 1,2-DCA. Monitoring well MW-14 which is also located inside the building detected up to 41,000 ppb TVH; 7,700 ppb

Mr. George Hill
Mr. Gordon Linden
January 25, 1999
Page 2 of 3

TEH; 7,100 ppb benzene; 11,000 ppb toluene; 720 ppb ethyl benzene; 3,900 ppb xylene and 440 ppb 1,2 DCA. Grab water sample collected from boring G (drilled outside the building) found up to 590,000 ppb TVH; 35,000 ppb TEH; 15,000 ppb benzene; 25,000 ppb toluene; 2100 ppb ethyl benzene; 10,800 ppb xylene and 880 ppb 1,2 DCA.

Based on the data collected for the site, the presence of free product and dissolved constituents in individual wells appears to be dependent on the presence of permeable sand and gravel layers within the screened interval of the wells. The permeable channel deposits found beneath the site appears to act as a preferential pathway for the migration of the product plume.

As we have discussed during the meetings, this agency in conjunction with the San Francisco Bay Regional Water Quality Control Board (RWQCB) will consider using the City of Oakland's Urban Land Redevelopment (Oakland's ULR) Program Risk Based Screening Level (RBSL) criteria for the subject site. A risk-based clean up action for the site is acceptable provided the following criteria are addressed in the Corrective Action Plan (CAP):

- 1) Primary source of contamination including free product found in the groundwater has been removed.
- 2) Extent of the soil and /or groundwater contamination has been adequately characterized.
- 3) The dissolved hydrocarbon plume is stable and not migrating.
- 4) No water wells, 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 and the environmental. Residual contamination in soil and groundwater does not pose a risk to human health or the environment.

Our office understands that the last criterion will be satisfied by using the City of Oakland's Urban Land Redevelopment (ULR) Program Risk Based Screening Level (RBSL) criteria. As a result, an expanded CAP will be required that will incorporate the following necessary elements of the ULR program:

- Geotechnical laboratory testing of two soil samples to confirm that soils beneath the site satisfy the ULR criteria; specific tests shall include grain size distribution (sieve analysis with hydrometer), porosity, moisture content, and specific yield;

Mr. George Hill
Mr. Gordon Linden
January 25, 1999
Page 3 of 3

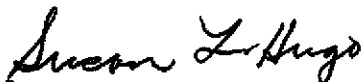
- Risk Management Plan (RMP) to manage residual contamination left at the site. ACDEH and City of Oakland Building and Planning Department should be notified prior to any construction, redevelopment and / or change in land use at the site.
- Upon direction of the regulatory agencies, appropriate abandonment of the monitoring wells prior to issuance of Site closure.

Our office also requires that the following specific actions be performed at the site and included in the CAP:

- Evaluation of the presence of preferential pathways such as utility lines or trenches along Broadway for the contaminant plume to migrate off-site.
- Free product recovery must be continued at the site as previously specified in our letter dated January 26, 1998; your proposal to install a passive product skimmer in well MW#6 and an absorbent "sock" in well MW#1 is acceptable.
- Groundwater monitoring should be continued as previously specified in the County's January 26, 1998 letter. The two monitoring wells MW-14 and MW-15 should be included in the groundwater-monitoring program. Any changes or modifications must have approval from this office.

In summary, the CAP must address the regulatory agency criteria described above. The site will be evaluated for closure when all the criteria described above have been met. During that time, the need for a deed notification will be evaluated as a condition of site closure. If you have any questions concerning this letter or the subject site, please call me at (510) 567-6780.

Sincerely,



Susan L. Hugo, Hazardous Materials Specialist

c: Mee Ling Tung, Director, Environmental Health
Dick Pantages, Chief, Environmental Health Protection Division
Steve Morse / Ravi Arulanantham, Cal/EPA San Francisco Bay RWQCB
Charles Headlee, Cal/EPA San Francisco Bay RWQCB
Mark Gomez, City of Oakland Public Works Agency - Environmental Services
250 Frank H. Ogawa Plaza, Suite 5301, Oakland, CA 94612
Jerri Alexander / Meg Mendoza, SCI, 3736 Mt. Diablo Blvd., Suite 200, Lafayette, CA 94549
SH / files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Ro # 199

January 26, 1998

Mr. George Hill
655 University Avenue, Suite 100
Sacramento, California 95825

Mr. Gordon Linden
150 La Salle Avenue,
Piedmont, California 94611

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

**RE: Work Plan for On Going and Additional Investigation at Connell Oldsmobile
3093 Broadway, Oakland, California 94611 (STID #469)**

Dear Messrs. Hill & Linden:

The Alameda County, Department of Environmental Health, Environmental Protection Division has reviewed the recently submitted work plan dated December 23, 1997, prepared and submitted by Subsurface Consultants, Inc. (SCI) for the above referenced site. I met with Mr. Terry McManus, Mr. Samuel Won, and Mr. Jeffrey Rubin of SCI today and discussed the status of the project and the scope of the proposed activities for the subject site.

This office has the following comments regarding the proposed work plan:

- 1) Groundwater monitoring must be continued at the site. The monitoring program described in my May 30, 1997 letter must be implemented and any changes or modification must have prior approval from this office. The monitoring program includes at a minimum the following:
 - quarterly sampling of wells MW-7, MW-8 and MW-13 and analyze for TVH, TEH, BTEX, MTBE and DCA
 - quarterly sampling of wells MW-1, MW-4 and MW-9 if free product is not detected in the wells; sample from MW-1 must be for analyzed for TVH, BTEX, O&G, TEH, DCA, SVOC and MTBE; and samples from MW-4 and MW-9 must be analyzed for TVH, BTEX, TEH, DCA and MTBE.
 - annual sampling of wells MW-2, MW-3, MW-5, MW-10, and MW-11 and analyze for TVH, BTEX, TEH, DCA and MTBE
 - semi-annual sampling of wells MW -1, MW-4, MW-6 and MW-9 and analyze for TVH, BTEX, TEH, DCA and MTBE; O&G and SVOC must be included as chemicals of concern for samples collected from MW-1.


- 2) Free product recovery (SVES and bailing) must be continued at the site. Monthly product level measurements must be conducted in all the wells and free product removal updates incorporated in the quarterly monitoring report. Due to the presence of free product detected at the site, this office approves the continued operation of the VRS system for removal and recovery of product from well MW-6, the proposed plan to connect well MW-4 to the unit as well and evaluation of the system after one year of operation.

Mr. Hill and Mr. Linden
RE: 3093 Broadway, Oakland, CA 94611
January 26, 1998
Page 2 of 2

- 3) The proposed plan for additional site characterization beneath the building is acceptable. Placement of wells to be installed at the site based on the results of the additional site characterization must be discussed and approved by this office.
- 4) The proposed groundwater pumping test to evaluate the potential enhancement of vapor extraction and product-recovery rates is acceptable. Results of the test should be used in the feasibility study to evaluate remedial options.
- 5) As stated in my May 30, 1997 letter, the stockpiled soil generated during the removal of the tank and subsequent investigations must be characterized and disposed properly. Copies of the disposal record must be submitted to this office.
- 6) The presence of utility lines along Broadway which may act as preferential pathways for contaminants to migrate must be evaluated.
- 7) Sampling event conducted last 11/5/97 showed MTBE at $< 1,000$ ug/l. Please use the lowest detection levels to confirm the concentration of MTBE found in the groundwater.

If you have any questions concerning this letter or the subject site, please call me at (510) 567-6780.

Sincerely,


Susan L. Hugo
Hazardous Materials Specialist

c: Mee Ling Tung, Director, Environmental Health
Dick Pantages, Chief, Environmental Protection Division / SH / files
Stephen Hill, San Francisco Bay RWQCB
Jeffrey Rubin, SCI, 3736 Mt. Diablo Blvd., Suite 200, Lafayette, CA 94549
Jonathan Redding, Fitzgerald, Abbott & Beardsley, 1221 Broadway, 21st Floor
Oakland, CA 94611

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 199

May 30, 1997

Mr. George Hill
655 University Avenue, Suite 100
Sacramento, California 95825

Mr. Gordon Linden
150 La Salle Avenue
Piedmont, California 94611

ENVIRONMENTAL HEALTH SERVICES

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

**RE: Soil and Groundwater Investigation / Remediation at Connell Oldsmobile
3093 Broadway, Oakland, California 94611 (STID # 469)**

Dear Messrs Hill & Linden:

The Alameda County Department of Environmental Health, Environmental Protection Division has recently reviewed the case file including the most recent reports (Groundwater Monitoring for February 1997 Event and the Free Product Recovery Update for March 1997) prepared and submitted by Subsurface Consultants, Inc. for the above referenced site. On March 18, 1997, I met with Mr. Samuel Won and Mr. James Helge of Subsurface Consultants, Inc. to discuss the status of the active remediation (soil vapor extraction system), free product recovery, groundwater monitoring and further work that will be required at the subject site.

This office has the following comments regarding the soil and groundwater investigation / remediation at the subject site:

- 1) Free product recovery must be continued at the site. The soil vapor extraction system (SVES) was installed in well MW-6 on October 29, 1996. The system was temporarily stopped in December 1996 due to large quantity of moisture being extracted and operation was resumed after replacement of the moisture trap. The SVES is currently operating at the site and have removed approximately 98 gallons of product as of 3/5/ 97. In addition, about 141 gallons of product have also been removed from monitoring wells MW-1, MW-4, MW-6 (prior to SVES installation) and MW-9 by hand bailing since 1991. Monthly product level measurements must be conducted in all the wells with the exception of MW-6. Termination of free product removal measures at the site must be approved by this office.
- 2) Monitoring wells MW-1, MW-4 and MW-9 must be sampled every quarter for dissolved petroleum hydrocarbon if product is not detected in the wells. Groundwater sample collected from MW-1 must be analyzed for TVH, BTEX, O&G, TEH, DCA, SVOC and MTBE. Samples collected from MW-4 and MW-9 must be analyzed for TVH, BTEX, TEH, DCA and MTBE. Review of the data collected for the site showed that MTBE was analyzed on samples collected from wells with low or non detectable total petroleum hydrocarbon concentration.

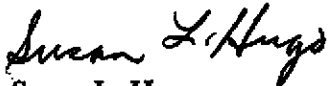
Mr. Hill and Mr. Linden
RE: 3093 Broadway Street, Oakland, CA 94611
May 30, 1997
Page 2 of 2

- 3) Stockpiled soil generated during the removal of the tank and subsequent soil / groundwater investigation must be characterized and disposed properly. Please submit copies of the disposal record to this office.
- 4) Groundwater monitoring must be continued at the site. Item # 2 listed above must be incorporated with the current monitoring program. Any changes in the monitoring program must be approved by this office.
- 5) Monthly free product removal updates can be incorporated with the quarterly groundwater monitoring report submittal.
- 6) The feasibility study results and final corrective action plan have to be submitted.

Response to the items listed above should be submitted to this office **no later than July 1, 1997.**

If you have any questions concerning this letter or the subject site, please call me at (510) 567-6780.

Sincerely,



Susan L. Hugo
Senior Hazardous Materials Specialist

c: Mee Ling Tung, Director, Environmental Health
Gordon Coleman, Chief, Environmental Protection Division
Kevin Graves, San Francisco Bay RWQCB
Samuel Won, SCI, 3736 Mt. Diablo Blvd., Suite 200, Lafayette, CA 94549
Jonathan Redding, Fitzgerald, Abbott & Beardsley, 1221 Broadway, 21st Floor
Oakland, CA 94611

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0199

RAFAT A. SHAHID, DIRECTOR

November 29, 1995
STID# 469

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

George and Kay Hill
305 Sheridan
Piedmont, California 94611

Gordon Linden
150 La Salle
Piedmont, California 94611

Jonathan Redding
Fitzgerald, Abbott & Beardsley
1221 Broadway, 21st Floor
Oakland, California 94612

**RE: Proposed Corrective Action Plan at Connell Oldsmobile
3093 Broadway, Oakland, California 94611**

Dear Mesdame and Sirs:

The Department of Environmental Health, Environmental Protection Division has completed review of the proposed Corrective Action Work Plan dated November 6, 1995, prepared and submitted by Subsurface Consultants, Inc. for the referenced site.

The proposed corrective action plan is acceptable to this agency and can be implemented. Please notify this office at least 72 hours prior to any field activity, so a site visit can be arranged.

Lastly, a typographical error on page 4 of the work plan was noted and should be corrected to "site studies between 1991 and 1993."

Please contact me at (510) 567-6780 if you have any questions concerning this letter.

Sincerely,

Susan L. Hugo

Susan L. Hugo
Senior Hazardous Materials Specialist

c: ✓ Jun Makishima, Interim Director, Environmental Health
Gil Jensen, Alameda County District Attorney's Office
Gordon Coleman, Acting Chief, Env. Protection Div./ files
Kevin Graves, San Francisco Bay RWQCB
William Rudolph / Jerriann Alexander, Subsurface Consultants
Inc. - 171 12th Street, Suite 201, Oakland, CA 94607

**ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY**

DAVID J. KEARS, Agency Director



R0199

RAFAT A. SHAHID, DIRECTOR

October 16, 1995
STID# 469

George and Kay Hill
101 Gleneden Avenue
Oakland, California 94611

Gordon Linden
150 La Salle
Piedmont, California 94611

Jonathan Redding
Fitzgerald, Abbott & Beardsley
1221 Broadway, 21st Floor
Oakland, California 94612

**RE: Soil / Groundwater Investigation at Connell Oldsmobile
3093 Broadway, Oakland, California 94611**

Dear Mesdame and Sirs:

As you all know, a Pre-Enforcement Review Panel meeting was held on September 27, 1995 to discuss compliance issues related to the clean-up and mitigation of contamination at the referenced site.

For the record, I want to clarify the statements contained in Mr. Redding's letter of July 31, 1995, that this office has "chosen to ignore the analysis or reject the suggestions raised by my consultant and refused to discuss the matter with us." On June 13, 1995, a correspondence was sent to Mr. Redding inquiring about the latest data collected for the site since the last report we had in our file at that time was the Phase III Hydrocarbon Contamination Assessment (January 13, 1994) and a cover letter from Subsurface Consultant, Inc. dated February 3, 1994 proposing a reduction of the frequency of the sampling program. To my knowledge, I am not aware of any rejection or refusal made by this office or by myself in discussing the proposed sampling plan. It is incumbent upon the responsible party to minimize environmental contamination and promote prompt cleanup that they may begin implementation of the proposed actions after the workplan has been submitted and before it has received agency concurrence that implementation of the said workplan may begin sixty (60) calendar days after submittal, unless the responsible party is otherwise directed in writing by the regulatory agency (CCR, Title 23, section 2722). At best, the proposed sampling plan which includes the continued recovery of the free product in wells MW-1, MW-6 and MW-4 and the quarterly sampling of wells at the plume boundary and the semi-annual sampling of the remaining wells should have been implemented.

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

Mr. Redding, Mr. Linden, Mr. & Mrs. Hill
RE: 3093 Broadway, Oakland, CA 94611
October 16, 1995
Page 2 of 4

Based on the latest data collected at the subject site and documented in the report "Groundwater Monitoring Event" (September 26, 1995), prepared and submitted by Subsurface Consultant, Inc. and received by this office on September 28, 1995, the free product found at the site have substantially increased. For example, monitoring well MW-6 had 3.06 feet product thickness in 11/9/93 and increased to 7.96 feet in 8/30/95 and was measured again at 6.14 feet in 9/15/95 after product bailing. Monitoring well MW-4 showed product thickness at 2.20 feet in 8/30/95 and reduced to 0.57 feet in 9/15/95 after free product bailing. Monitoring well MW-1 found 0.23 feet product thickness in 8/30/95 and 0.15 feet in 9/15/95 after free product bailing. Clearly, the periodic free product recovery has been an effective interim remedial measure.

This office has the following comments regarding the conclusions found in the September 26, 1995 report:

1. **Free Product** - increases in free product thickness are related to the remaining source of contamination in both soil and groundwater at the site. Since no interim remedial measure was implemented from 11/93 to 8/95, the free product accumulated at various wells (MW-1, MW-4 and MW-6).
2. **Dissolved Product Plume** - it appears that the dissolved contaminant plume may have migrated off-site. The downgradient well MW-13 which had been non detect for benzene and 1,2 DCA found 49 ppb benzene and 3.6 ppb 1,2 DCA during the sampling conducted on August 1995.
3. **Remediation** - as an interim remedial measure, monthly free product removal on wells MW-1, MW-4 and MW-6 is acceptable and must be implemented as soon as possible. The last free product removal in those wells was conducted in September 15, 1995. With regards to the proposed soil vapor extraction pilot test in MW-6, and free product bail-down tests in MW-1, MW-4 and MW-6, this office has no objection in conducting such tests. However, a **Corrective Action Plan** must be submitted for the site which should include the following elements:
 - * assessment of impacts listed in CCR Title 23 Section 2725 (e)
 - * a feasibility study, in accordance with Section 2725 (f)
 - * applicable cleanup levels, in accordance with Section 2725 (g)

The corrective action plan must be submitted to this office no later than December 15, 1995. Additionally, a more detailed work plan for the proposed soil-vapor extraction pilot test must be submitted prior to implementation and permitting requirements from other regulatory agencies must be followed.

Mr. Redding, Mr. Linden, Mr. & Mrs. Hill
RE: 3093 Broadway, Oakland, CA 94611
October 16, 1995
Page 3 of 4

4. Future Monitoring - the proposed monitoring program is acceptable provided the following items are addressed:
- * TPH as diesel and MTBE must be included as target analytes.
 - * All wells must be monitored for the presence of free product and free product removal must be continued on a monthly basis.
 - * If future data have established that the plume has migrated beyond the most downgradient well (MW-13), a contingency plan to prevent continuous plume migration must be submitted in a timely manner and an interim preventive measures implemented promptly.
 - * Quarterly monitoring reports must be submitted within 45 days of completed work at the site. The monthly free product removal report which includes historical data of free product recovered from the wells should be incorporated in the quarterly report.
 - * Isoconcentration maps for soil and groundwater contamination should be included in the quarterly report in addition to the groundwater contour map.
 - * Future monitoring for the site will be evaluated and modified as needed.

Please submit copies of the disposal records for the stockpiled soil generated during the removal of the three underground storage tanks.

Any changes to the submitted tentative schedule of the investigation and remediation at the site must be discussed and approved by this office.

Until cleanup is complete, you will need to submit reports to this office **every three months** (or at a more frequent interval, if specified at any time by this agency). In addition, the following items must be incorporated in your future reports or workplans:

- a cover letter from the responsible party or tank owner stating the accuracy of the report and whether he/she concurs with the conclusions and recommendations in the report or workplan
- site map delineating contamination contours for soil and groundwater based on recent data should be included and the status of the investigation and cleanup must be identified
- proposed continuing or next phase of investigation / cleanup activities must be included to inform this department of the responsible party or tank owner's intention

Mr. Redding, Mr. Linden, Mr. & Mrs. Hill
RE: 3093 Broadway, Oakland, CA 94611
October 16, 1995
Page 4 of 4

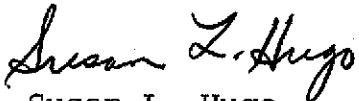
- any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained
- historical records of groundwater level in each well must be tabulated to indicate the fluctuation in water levels
- tabulate analytical results from all previous sampling events; provide laboratory reports (including quality control/quality assurance) and chain of custody documentation

All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project.

Lastly, this office has always been working with all responsible parties in providing oversight work for the cleanup and mitigation of contaminated sites and developing a reasonable approach that is protective of the public health, safety and the environment.

Please contact me at (510) 567-6780 if you have any questions concerning this letter.

Sincerely,



Susan L. Hugo
Senior Hazardous Materials Specialist

cc: Jun Makishima, Interim Director, Environmental Health
Gil Jensen, Alameda County District Attorney's Office
Gordon Coleman, Acting Chief, Env. Protection Division
Kevin Graves, San Francisco Bay RWQCB
Cheryl Gordon, SWRCB Clean Up Fund Program
William Rudolph / Jerriann Alexander, Subsurface Consultants
Inc.- 171 12th Street, Suite 201, Oakland, CA 94607
files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0199

RAFAT A. SHAHID, DIRECTOR

August 18, 1995
STID# 469

Mr. George Hill
Ms. Kay Hill
101 Gleneden Avenue
Oakland, California 94611

Mr. Jonathan Redding
Fitzgerald, Abbott & Beardsley
1221 Broadway, 21st Floor
Oakland, California 94612

RE: **Connell Oldsmobile**
3093 Broadway, Oakland, California 94611

Dear Mr. Hill, Ms. Hill, and Mr. Redding:

As you know, the Pre Enforcement Review Panel is scheduled on September 27, 1995 at this office.

In order to not cause any further delay in the investigation, the proposed round of sampling is hereby approved. Please notify this office when sampling will be conducted at the site.

If you have any questions concerning this letter, you can contact me at (510) 567-6780.

Sincerely,

Susan L. Hugo
Senior Hazardous Materials Specialist

cc: Jun Makishima, Interim Director, Environmental Health
Gil Jensen, Alameda County District Attorney's Office
Leroy Todd, Acting Chief, Environmental Protection
Division / files
Kevin Graves, San Francisco Bay RWQCB
Jerriann Alexander, SCI - 171 12th Street, Suite 201
Oakland, CA 94607

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

**Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division**

In Re The Property Known As :)	Notice of
)	Pre-Enforcement
Connell Oldsmobile)	Review Panel
3093 Broadway)	
Oakland, California 94611)	

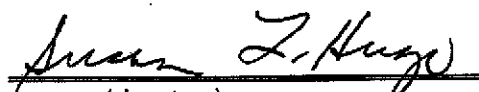
Notice is hereby given that upon the motion of the Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board a **Review Panel** will convene on September 27, 1995 at 11:00 AM in the office of the Alameda County Environmental Protection Division located at 1131 Harbor Bay Parkway, Room 106, Alameda, CA 94602. This **Review Panel** will convene for the purpose of determining responsible parties as well as appropriate closure, site assessment, clean-up and mitigation of contamination at the above location.

The Alameda County Environmental Protection Division, and the San Francisco Bay Regional Water Quality Control Board have named and served notice of this **Review Panel** on the following persons or entities as having proposed responsibility for closure, site assessment, clean-up and mitigation of contamination at the above location, and by this notice all parties named herein are informed of the right to appear and show cause, if any they have, for the exclusion or inclusion of any of the parties served herein from said responsibility or obligations:

1. George and Kay Hill
101 Gleneden Avenue, Oakland, CA 94611

2. Mr. Jonathan Redding
Fitzgerald, Abbott & Beardsley
1221 Broadway, 21st Floor
Oakland, California 94611

Dated: August 17, 1995


(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Environmental Protection Division

In Re The Property Known As :

Connell Oldsmobile
3093 Broadway
Oakland, California 94611

) Proof of Service of
) Notice of
) Pre-Enforcement
) Review Panel

I Susan L. Hugo, do hereby certify

that I served George and Kay Hill
with a copy of the attached **Notice of Pre-Enforcement Review Panel**
on August 17, 1995 by certified mailer # Z 196 176 913.

Dated: 8/17/95

Susan L. Hugo
(signature)

**Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division**

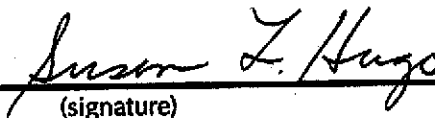
In Re The Property Known As :)	Notice of
)	Pre-Enforcement
Connell Oldsmobile)	Review Panel
3093 Broadway)	
Oakland, California 94611)	

Notice is hereby given that upon the motion of the Alameda County Hazardous Materials Division, and the San Francisco Bay Regional Water Quality Control Board a **Review Panel** will convene on **September 27, 1995 at 11:00 AM** in the office of the Alameda County Environmental Protection Division located at 1131 Harbor Bay Parkway, Room 106, Alameda, CA 94602. This **Review Panel** will convene for the purpose of determining responsible parties as well as appropriate closure, site assessment, clean-up and mitigation of contamination at the above location.

The Alameda County Environmental Protection Division, and the San Francisco Bay Regional Water Quality Control Board have named and served notice of this **Review Panel** on the following persons or entities as having proposed responsibility for closure, site assessment, clean-up and mitigation of contamination at the above location, and by this notice all parties named herein are informed of the right to appear and show cause, if any they have, for the exclusion or inclusion of any of the parties served herein from said responsibility or obligations:

1. George and Kay Hill
101 Gleneden Avenue, Oakland, CA 94611
2. Mr. Jonathan Redding
Fitzgerald, Abbott & Beardsley
1221 Broadway, 21st Floor
Oakland, California 94611

Dated: August 17, 1995


(signature)

Alameda County Health Care Services Agency, Department of
Environmental Health, Environmental Protection Division

In Re The Property Known As :

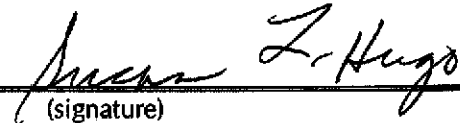
Connell Oldsmobile
3093 Broadway
Oakland, California 94611

) Proof of Service of
) Notice of
) Pre-Enforcement
) Review Panel

I Susan L. Hugo, do hereby certify

that I served Mr. Jonathan Redding
with a copy of the attached Notice of Pre-Enforcement Review Panel
on August 17, 1995 by certified mailer # Z 196 176 912

Dated: 8/17/95


(signature)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0199

RAFAT A. SHAHID, DIRECTOR

June 13, 1995
STID# 469

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

Helen C. Connell Trust
c/o Mr. Jonathan Redding
Fitzgerald, Abbott & Beardsley
1221 Broadway, 21st Floor
Oakland, California 94612

**RE: Soil / Groundwater Investigation at Connell Oldsmobile
3093 Broadway, Oakland, California 94611**

Dear Mr. Redding:

This office has recently reviewed the case file regarding the soil and groundwater investigation associated with the three former underground storage tanks at the referenced site.

A report " Phase III Hydrocarbon Contamination Assessment" dated January 13, 1994, prepared by Subsurface Consultants, Inc. is the latest correspondence submitted for the subject site.

Based on this review, the following issues must be addressed regarding the soil and groundwater investigation at the site:

- 1) Free floating product (average thickness of about 1 inch) has been detected in monitoring wells MW-1 and MW-6. Monitoring wells MW-4 and MW-10 had an average product thickness of about 10 inches. Product recovery data presented on Table 3 of the January 13, 1994 report indicate that the last product removal was conducted on November 9, 1993. No data was provided for MW-10. Please clarify if quarterly monitoring of the wells and free product recovery had been conducted since the sampling performed on November 1993. Free product must be recovered in all the wells on a regular basis and product removal must comply with the requirements as stated in the California Code of Regulations, Title 23, Section 2655.
- 2) Elevated concentrations of dissolved petroleum hydrocarbon contamination have been detected in groundwater up to 620 ppm TPH as gasoline, 25 ppm TPH as diesel, 51 ppm benzene, 59 ppm toluene, 7.9 ppm ethyl benzene, and 41 ppm xylene. Dibromochloro-methane at 160 ppb and 1,2 dichloroethane as high as 2,900 ppb were also found in the groundwater. Quarterly monitoring program must be implemented for all the wells at the site and groundwater samples must be analyzed for the following target compounds: TPH gasoline, TPH diesel, TPH oil and grease, BTEX, chlorinated hydrocarbons, and semi-volatile organics. The monitoring program will be evaluated and maybe modified after four consecutive quarters of sampling events have been achieved.

Helen C. Connell Trust
c/o Mr. Jonathan Redding
RE: 3093 Broadway, Oakland, CA 94611
June 13, 1995
Page 2 of 3

- 3) Groundwater elevation measurements must be conducted during the quarterly sampling to establish groundwater flow direction at the site.
- 4) Stockpiled soil generated during the removal of the three underground storage tanks must be characterized for proper disposal. Copies of the disposal records must be submitted to this agency.
- 5) Two six inch extraction wells (MW-8 and MW-10) were installed on October, 1992. Pump tests were conducted in these two wells and the test results indicated that pumping from MW-10 had an effect on wells located up to 200 feet away in which coarse grained soils were present at the groundwater surface while MW-8 showed no effect in the water levels. Has the groundwater extraction system proposed in the July, 1992 workplan been installed at the site ? Please provide our office with all the details of the remediation plan which must include the systems implemented to date address both the soil and groundwater contamination found at the site.
- 6) Please submit a time schedule for all the phases of the investigation and remediation activities to be conducted at the site.
- 7) A site safety plan must be submitted to this office.

Response to all the issues mentioned above must be submitted to this office **no later than July 31, 1995**. Issues #1 to #6 are basically the same issues requested in the October 7, 1992 letter from this office. Failure to comply may result in the case being referred to the Alameda County District Attorney's Office for enforcement actions.

Until cleanup is complete, you will need to submit reports to this office **every three months** (or at a more frequent interval, if specified at any time by this agency). In addition, the following items must be incorporated in your future reports or workplans:

- a cover letter from the responsible party or tank owner stating the accuracy of the report and whether he/she concurs with the conclusions and recommendations in the report or workplan
- site map delineating contamination contours for soil and groundwater based on recent data should be included and the status of the investigation and cleanup must be identified

Helen C. Connell Trust
c/o Mr. Jonathan Redding
RE: 3093 Broadway, Oakland, CA 94611
June 13, 1995
Page 3 of 3

- proposed continuing or next phase of investigation / cleanup activities must be included to inform this department of the responsible party or tank owner's intention
- any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained
- historical records of groundwater level in each well must be tabulated to indicate the fluctuation in water levels
- tabulate analytical results from all previous sampling events; provide laboratory reports (including quality control/quality assurance) and chain of custody documentation

All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project.

Please contact me at (510) 567-6780 if you have any questions concerning this letter.

Sincerely,



Susan L. Hugo
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Director, Environmental Health
Gil Jensen, Alameda County District Attorney's Office
Mee Ling Tung, Acting Chief, Environmental Protection
Division / files
Kevin Graves, San Francisco Bay RWQCB
Helen Connell Trust, 101 Gleneden Avenue, Oakland CA 94611
Jerriann Alexander, SCI - 171 12th Street, Suite 201
Oakland, CA 94607

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0199

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

October 7, 1992
STID# 469

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

Mr. Jonathan W. Redding
Fitzgerald, Abbott & Beardsley
1221 Broadway, 21st Floor
Oakland, California 94612-1837

RE: **Connell Oldsmobile**
3093 Broadway, Oakland, California 94611

Dear Mr. Redding:

The Alameda County Department of Environmental Health, Hazardous Materials Division has recently reviewed the files concerning the removal of three underground storage tanks at the referenced site. This office is also in receipt and has completed its review of the "Workplan - Groundwater Characterization" dated July 15, 1992 and Project Update - Free Product Recovery dated June 4, 1992 submitted by Subsurface Consultants, Inc. for the Connell Oldsmobile facility.

Based on this review, this department concurs with the basic elements of the workplan. However, the following issues must be addressed before the workplan can be implemented:

- * Groundwater monitoring wells MW-1 (installed in October, 1990) and MW-2 through MW-7 (installed in March, 1991) were **sampled only one time** after their installation. MW-1 detected the following contaminants during the October, 1990 sampling event: 620 ppm Total Petroleum Hydrocarbon as gasoline, 33 ppm benzene, 50 ppm toluene, 7.9 ppm ethyl benzene, 41 ppm xylene and 2.9 ppm 1,2-dichloroethane. MW-4 (sampled in March, 1991) found 150 ppm Total Petroleum Hydrocarbon as gasoline, 20 ppm benzene, 38 ppm toluene, 2.8 ppm ethyl benzene, 14 ppm xylene and 0.610 ppm 1,2-dichloroethane. MW-6 (sampled in March, 1991) detected 80 ppm Total petroleum Hydrocarbon as gasoline, 12 ppm benzene, 13 ppm toluene, 1.1 ppm ethyl benzene, 5.4 ppm xylenes, 1.4 ppm 1,2-dichloroethane and 0.16 ppm dibromochloromethane. **Quarterly monitoring is the maximum sampling interval** typically allowed when groundwater contamination is present as per Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites (August 10, 1990). **It is prudent to implement quarterly sampling** of all monitoring wells (MW-1 through MW-7) in a timely fashion because of the extent groundwater contamination at the site. Groundwater samples must be analyzed for target compounds

Mr. Jonathan Redding
RE: 3093 Broadway, Oakland, California 94611
October 7, 1992
Page 2 of 4

(TPH as gasoline, TPH as diesel, Oil & Grease, BTXE, Chlorinated Hydrocarbons and Semivolatile Organics, etc.). After four quarters of non detectable levels have been achieved, the frequency of sampling events will be evaluated and/or recommendation for signoff/case closure by RWQCB will be determined.

- * Groundwater elevation reading must be performed every month for twelve consecutive months and reduced to every quarter after the first year. However, if the verified groundwater flow direction had been established at the site, water elevation reading must be performed every sampling event.
- * Free floating product had been collected from MW-1, MW-4 and MW-6 since December 23, 1991. As stated in the July 15, 1992 workplan, a total of 70 gallon of free product had been recovered from these wells. Free floating product must be measured in all the wells using an optical probe or a comparable instrument capable of measuring free product to 0.01 foot. These data must be incorporated in your quarterly report. Free product must be recovered in all the wells on a regular basis. Free product removal must comply with the California Code of Regulations, Title 23, Section 2655.
- * Please clarify the stockpiled soil disposition. Is this still on site ? Documentation of stockpiled soil disposal must be submitted to this office.
- * Please provide this office with copies of the tank disposal records (manifests).
- * Permits from other regulatory agencies which are applicable to the investigation/remediation activities at the site must be followed.
- * With regards to the groundwater extraction system to be installed at the site, please provide this office with the following items:
 - detailed systems engineering drawings
 - equipment cut sheets
 - operational flow diagrams
 - rationales to substantiate the selection of the referred location of the extraction well
 - monitoring plan to determine the effectiveness of the treatment system
 - contingency plan for system breakdown
 - estimate duration of the pump and treat operation

Mr. Jonathan Redding
RE: 3093 Broadway, Oakland, California 94611
October 7, 1992
Page 3 of 4

- * Please submit a time schedule for all phases of the investigation and remediation activities and the anticipated time when cleanup will be completed at the site.

A report must be submitted within 30 days after completion of this investigation. Until cleanup is complete, you will need to submit reports to this office and to RWQCB every three months (or at a more frequent interval, if specified at any time by either agency). In addition, the following items must be incorporated in your future reports or workplans:

- a cover letter from the responsible party or tank owner stating the accuracy of the report and whether he/she concurs with the conclusions and recommendations in the report or workplan
- site map delineating contamination contours for soil and groundwater based on recent data should be included and the status of the investigation and cleanup must be identified
- proposed continuing or next phase of investigation / cleanup activities must be included to inform this department or the RWQCB of the responsible party or tank owner's intention
- any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained
- historical records of groundwater level in each well must be tabulated to indicate the fluctuation in water levels
- tabulate analytical results from all previous sampling events; provide laboratory reports (including quality control/quality assurance) and chain of custody documentation

All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project. Copies of reports must also be submitted to :

Rich Hiett
RWQCB, San Francisco Bay Region
2101 Webster Street, Fourth Floor
Oakland, California 94612

Mr. Jonathan Redding
RE: 3093 Broadway, Oakland, California 94611
October 7, 1992
Page 4 of 4

Because we are overseeing this site under the designated authority of the Regional Water Quality Control Board, this letter constitutes a formal requests for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency or RWQCB.

Please contact me at (510) 271-4530 if you have any questions concerning this letter.

Sincerely,



Susan L. Hugo
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health
Rich Hiett, San Francisco Bay RWQCB
Gil Jensen, Alameda County District Attorney's Office
Edgar B. Howell, Chief, Hazardous Materials Division - files
Jerriann Alexander - Subsurface Consultants, Inc.
171 12th Street Suite 201
Oakland, California 94607

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



✓ R0199 (3093 Broadway)

R0702 (2915 Broadway)

March 21, 1991

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

Mr. Oliver B. Christen
Environmental Science & Engineering, Inc.
4090 Nelson Ave., Suite J
Concord, CA 94520

Dear Mr. Christen:

In a letter to this office dated March 5, 1991, as well as in a subsequent telephone conversation, you requested current environmental information on two locations in Oakland, California: European Motors at 2915 Broadway, and Connell Oldsmobile at 3093 Broadway.

European Motors

On November 20, 1989, three underground tanks were removed from this site; two of the tanks contained gasoline, and the third contained diesel. A standing water sample from the visually contaminated tank pit contained 1,500 ppm waste oil, and 590 ppm diesel. A composited sample from the stockpiled soil contained 130 ppm diesel. Soil contamination at the edges of the pit was minor.

Three monitoring wells were installed around this pit after backfilling. The driller initially encountered water at a depth of about 20 feet, but water levels rose to a stabilized depth of 10-12 feet, indicating a confined shallow aquifer. On March 1, 1990, water from one monitoring well showed 0.06 ppm diesel, but all other results for the three wells were "ND." On January 17, 1991, all wells tested as "ND" for all analytes. Groundwater flow at this site appears to be towards the southeast.

Connell Oldsmobile

On December 18, 1989, three underground tanks were removed from the Hawthorne St. sidewalk adjacent to the facility's service area; the tanks had contained various combinations of gasoline, diesel, and waste oil over the years. Soil beneath the tanks was heavily contaminated, containing gasoline, diesel, oil & grease, and BTEX. In October 1990, one monitoring well was installed downgradient of the former tanks' location. Groundwater from this well contained 620 ppm TVH, between 8 and 50 ppm BTEX, and 2.9 ppm dichloroethane; in addition, there was about 1 inch floating product in the well prior to sampling. The site investigation report cites significant gasoline contamination in soil near the previous tanks, extending to a depth of 30 or 35 feet. Groundwater at this site appears to flow

✓R0199
R0702

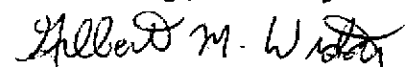
Mr. Oliver B. Christen
March 21, 1991
Page 2 of 2

towards the south at a gradient of 2%. Further site characterization is underway.

This letter contains information limited to files in this office, and does not reflect information that may be available from other agencies or parties. As I explained over the phone, your company will be billed for provision of this service; enclosed is a copy of the invoice sent to our Billing Department.

If you have any questions concerning this letter, please contact the undersigned at (415) 271-4320.

Sincerely,



Gil Wistar
Hazardous Materials Specialist

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0199

January 7, 1991

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

Mr. Jonathan W. Redding
Fitzgerald, Abbott & Beardsley
1221 Broadway, 21st Fl.
Oakland, CA 94612-1837

Re: **Proposal for further contamination assessment work at Connell
Oldsmobile, 3093 Broadway, Oakland**

Dear Mr. Redding:

Thank you for submitting Subsurface Consultants' contamination assessment report for the above site. This report clearly indicates the presence of significant subsurface contamination, both in soil and in groundwater. We concur that additional downgradient monitoring wells need to be installed to define the limits of groundwater contamination, and further work to define this plume should begin as soon as possible. In addition, as SCI recommends on pg. 9 of its report, Connell will need to determine the lateral and vertical extents of soil contamination.

The discovery of floating product in MW-1 and borings 1 and 3, as well as the high levels of soil contamination found, suggest the necessity of a comprehensive remediation plan once subsurface hydrocarbons have been characterized. All work completed from this point forward should be designed with this in mind.

It is acceptable to delay the treatment/disposal of contaminated stockpile soil, provided that hydrocarbons within the soil are prevented from migration. Please indicate in a letter what steps have been taken to fully contain this contamination until the soil is treated or disposed of. If you have any questions about this letter, please contact me at 271-4320.

Sincerely,

Gil Wistar
Hazardous Materials Specialist

cc: Bill Rudolph, Subsurface Consultants (171 - 12th St., Oakland,
CA 94607)

Howard Hatayama, DOHS
Lester Feldman, San Francisco Bay RWQCB
Rafat Shahid, Asst. Agency Director, Environmental Health
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0199

September 19, 1990

Dean Weaver
Connell Oldsmobile
3093 Broadway
Oakland, CA 94611

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

Re: Waste Minimization Assessment

Dear Dean Weaver:

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,

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



R0199

Certified Mailer # P 062 127 870

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

July 19, 1990

Mr. Dean Weaver
General Manager
Connell Auto Center
3093 Broadway
Oakland, CA 94611

NOTICE OF VIOLATION

Dear Mr. Weaver:

As you're probably aware, three underground storage tanks were removed from the Connell Auto Center facility in December 1989. The tanks had been rendered unusable as a result of a break in an EBMUD water line along Hawthorne St. Samples collected from the soil beneath the tanks showed significant levels of hydrocarbon contamination. Subsequently, Subsurface Consultants, Inc. prepared a work plan designed to assess the extent of hydrocarbons in the subsurface environment. This plan included the installation of both soil borings and groundwater monitoring wells; it was prepared on March 19, 1990, and fulfilled requirements established by the Regional Water Quality Control Board (RWQCB) for preliminary assessments. However, as of the date of this letter, none of the work described in the work plan has been initiated at the site.

Therefore, Connell Auto Center, as the operator of the tanks, is in violation of Sec. 25298(c)(4) of the California Health and Safety Code (H&SC), which prohibits incomplete or improper closure of underground tanks. (Tank closure includes the definition and cleanup of hydrocarbon contamination.) In addition, according to Sec. 25299.37 H&SC, Connell is required to complete specific work and submit technical reports within established deadlines, after the discovery of subsurface contamination.

We are requiring that the tasks described in Subsurface Consultants' work plan be completed as soon as possible, and a report documenting the results be submitted to this office no later than September 7, 1990. In addition, the work plan must be amended to include treatment/disposal techniques for the excavation spoils still stockpiled at the facility. All of the composite samples taken from this soil showed hydrocarbon contamination.

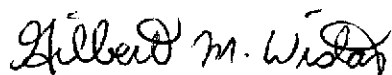
Mr. Dean Weaver
July 19, 1990
Page 2 of 2

This office is the lead agency overseeing the Connell environmental investigation and cleanup. The RWQCB is currently unable to manage the large number of fuel leak cases within Alameda County, and has therefore delegated this authority, including provisions of the California Water Code, to our office. Nonetheless, you must continue to keep the Water Board apprised of all actions taken to characterize and remediate contamination, because the Board retains the ultimate responsibility for ensuring protection of waters of the state.

Because we are overseeing this site under the designated authority of the Water Board, this letter constitutes a formal request for technical reports, per Sec. 13267(b) of the California Water Code. Failure to respond in a timely manner could result in civil liabilities under the Water Code of up to \$1,000 per day. Other violations of California law, as outlined above, may also be cited.

If you have any questions about this letter or about remediation requirements established by the RWQCB, please contact the undersigned at 271-4320.

Sincerely,



Gil Wistar
Hazardous Materials Specialist

cc: Bill Rudolph, Subsurface Consultants (171 - 12th St., Oakland,
CA 94607)
Jonathan Redding, Fitzgerald, Abbott & Beardsley (1221
Broadway, 21st Fl., Oakland, CA 94612-1837)
Howard Hatayama, DOHS
Lester Feldman, San Francisco Bay RWQCB
Gil Jensen, District Attorney, Alameda County Consumer and
Environmental Protection Division
Rafat Shahid, Asst. Agency Director, Environmental Health
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0199

January 4, 1990

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

Mr. Douglas P. Kell
Adjustco
401 Roland Way, Suite 235
Oakland, CA 94621-2011

Dear Mr. Kell:

As requested in your letters dated December 5, 1989 and January 2, 1990, the Hazardous Materials Division has reviewed its hazardous waste generator and underground tank files for the Connell Oldsmobile site at 3093 Broadway in Oakland. The file review yielded the following information.

Permit applications for two tanks were received in October 1987, and an interim operating permit from this office was issued to Connell Oldsmobile on May 16, 1988. The tanks permitted at that time were a 250-gallon waste oil tank and a 2,000-gallon unleaded gasoline tank. The monitoring method prescribed for the waste oil tank was "visual"; the method prescribed for the gasoline tank was "pressure test." The facility file contains no information or paperwork on any annual precision test or other monitoring/leak detection techniques.

This letter contains information limited to files in this office, and does not reflect information that may be available from other agencies or parties. You will be billed for provision of this service; enclosed is a copy of the invoice sent to our Billing Department.

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

Sincerely,

Gil Wistar
Hazardous Materials Specialist

c: Rafat A. Shahid, Asst. Agency Director, Environmental Health

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH

MFR Sent _____ (date)

PURPOSE: Permit Application Service Update

Computer No.

TYPE OF ACTION: New Premises Change of Owner Change of Name Change of Status Inactivate Delete Unincorp.

Premises Name Cornell Oldmobile SUPV. DIST. C.T. 4
A. Premises Address 3093 Broadway Oakland 94611
Number Street City Zip Code Phone

Owner/Operator _____ If corporation, also show name of corporation president _____ Phone _____
B. Home Address Adjusted 401 Roland Way #235 Oakland 94621-2011
Number Street City Zip Code

SEND BILLING TO ADDRESS: A B

Prior Business Name _____ Prior Owner's Name _____

Property Owner _____ If corporation, also show name of corporation president _____ Phone _____

Address _____ Number Street City Zip Code

FOOD PREMISES SWEEPS CODE <input type="checkbox"/> <input type="checkbox"/>		E. U. NO. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		
Bakery <input type="checkbox"/> Under 2,000 sq. ft. <input type="checkbox"/> 2,000 - 6,000 sq. ft. <input type="checkbox"/> Over 6,000 sq. ft. Food Market, Retail <input type="checkbox"/> Under 3,000 sq. ft. <input type="checkbox"/> 3,000 - 10,000 sq. ft. <input type="checkbox"/> Over 10,000 sq. ft. <input type="checkbox"/> Confectionary Food Vehicle <input type="checkbox"/> Industrial Catering <input type="checkbox"/> Mobile Food Prep. Unit <input type="checkbox"/> Itinerant Restaurant <input type="checkbox"/> Temporary (1-45 days) <input type="checkbox"/> Tavern, Cocktail lounge <input type="checkbox"/> Snack Bar <input type="checkbox"/> Drive-In, Take Out <input type="checkbox"/> Catering Commissary <input type="checkbox"/> Under 26 seats <input type="checkbox"/> 26 - 50 seats <input type="checkbox"/> 51 - 75 seats <input type="checkbox"/> Over 75 seats	<input type="checkbox"/> Vending Machine <input type="checkbox"/> Food Crop Growing & Harvesting Oper. <input type="checkbox"/> Ice Plant/Distributor <input type="checkbox"/> Other Food	Waste Disposal <input type="checkbox"/> Sewage Transport Vehicle <input type="checkbox"/> Discrete Sewerage Facility Private Waste Disposal <input type="checkbox"/> Hog Farm <input type="checkbox"/> Animal Feed Lot Septic Tank <input type="checkbox"/> Site Evaluation <input type="checkbox"/> Plan Review <input type="checkbox"/> Percolation Test <input type="checkbox"/> Installation Holding Tank <input type="checkbox"/> Site Evaluation <input type="checkbox"/> Installation <input type="checkbox"/> Inspection	GENERAL CATEGORIES <input type="checkbox"/> Public Swimming Area <input type="checkbox"/> Wiping Rag Business <input type="checkbox"/> Mobilehome Park No. Spaces _____ <input type="checkbox"/> Plan Review <input type="checkbox"/> Home Quarantine of Biting Animals	Water Supply-Utility <input type="checkbox"/> Community System <input type="checkbox"/> Non-Community System <input type="checkbox"/> State Small Water System <input type="checkbox"/> Local Small Water System Private Water Supply <input type="checkbox"/> Flow, Bacti. & Chem. Anal. Drinking Water Analysis <input type="checkbox"/> Bacterial <input type="checkbox"/> Chemical <input type="checkbox"/> Other

Number of Units/Hrs. 1 Fee Per Unit/Hr. \$ 56 Total Fee \$ 56

REMARKS: file search for 3093 Broadway, Oakland, requested by letter

You will receive a BILL in accordance with Article 11 of Chapter 6, Title 3 of the Ordinance Code of Alameda County

Owner/Operator or Authorized Representative _____ Date _____
Hazardous Materials Spec. Albert M. Winters Phone 271-4320 Date 1/3/90

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



✓ R0199 (3093 Broadway)

R01055 (3300
webster)

DEPARTMENT OF ENVIRONMENTAL HEALTH
470 - 27th Street, Third Floor
Oakland, California 94612
(415)

September 13, 1988

Mr. William M. Schill
U.S. Testing Co., Inc.
3536 Oakdale Road
P.O. Box 6673
Modesto, CA 95355

Dear Mr. Schill:

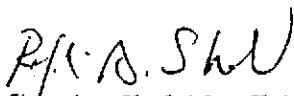
In response to your request of file search for 3300 Webster St., Oakland, CA, and neighboring properties, the following information is presented:

3300 Webster St.	Broadway Webster Medical Plaza, NO HAZARDOUS MATERIALS on site.
3300 Webster St.	Paul Faberman & Co., Had a 100 Gallon diesel tank removed on 9/1/87. Soil sample indicated NO CONTAMINATION of significance, less than 100 ppm TPH.
3300 Broadway	Val Strough Co. is adjacent north of site, has 2 underground tanks registered with no record of release.
3093 Broadway	Connell Oldsmobile is adjacent south, has 3 underground tanks registered with our department. A small supply line leak was detected and the line replaced. NO other records of releases.

This letter is limited to information available to this Department and does not reflect other information which may be accessible to other agencies or businesses involved with this property.

If you have any questions, please contact Edgar B. Howell, III, Program Administrator, at 415-271-4320.

Sincerely,


Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:EBH:mnc

cc: Files
Edgar B. Howell

Attachment 1