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STRATUS ENVIRONMENTAL, INC.

3330 Cameron Park Drive, Ste 550
Cameron Park, California 95682
(530) 676-6004 ~ Fax: (530) 676-6005

May 20, 2005
Project No. 2007-0057-01

Mr. Robert E. Cave
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, California 94109

Re: Three Week Dual Phase Extraction Event Notification
Application Number 9766 and Plant Number 16133
Former USA Station No. 57
10700 MacArthur Boulevard
Oakland, California

Dear Mr. Cave:

Stratus Environmental Inc. (Stratus) has prepared this letter, on behalf of CBA Equipment, LLC (CBA), to notify Bay Area Air Quality Management District (BAAQMD) regarding the use of a BAAQMD permitted (Application Number 9766 and Plant Number 16133), CBA-owned, Solleco 400 cubic feet per minute (cfm) Dual Phase Extraction (DPE) System at former USA Gasoline (USA) Station No. 57, located at 10700 MacArthur Boulevard, Oakland, California (see Figure 1). The three week DPE mass extraction event is scheduled to begin on June 6, 2005, and the system will be operated 24 hours a day.

During July 2004, Stratus conducted a 20-day DPE feasibility test/mass extraction event using the proposed DPE unit. Based on the results of the feasibility test and analytical data for the quarterly groundwater samples collected from monitoring wells, Stratus prepared and submitted a *Dual Phase Extraction Test Report* (dated October 15, 2004) to Alameda County Health Care Services (ACHCS) proposing to conduct additional DPE events to further reduce the subsurface petroleum hydrocarbon mass. ACHCS approved this scope of work in a letter dated May 9, 2005 (Appendix A).

Stratus proposes to conduct the first three week DPE event beginning June 6, 2005, using a CBA 400 cfm DPE system (Application Number 9766 and Plant Number 16133). Petroleum hydrocarbon laden soil vapors and groundwater will be extracted from existing extraction wells (S-1, S-2, and MW-3, Figure 2) using the 25 horsepower (hp) liquid ring pump on the proposed trailer mounted DPE system. The extracted soil vapors will be abated in a thermal oxidizer before discharging into the atmosphere; extracted groundwater will be treated using granular activated carbon vessels prior to discharging to the sanitary

sewer, or disposed of appropriately at a waste acceptance facility (see Figure 3). A 49 hp propane generator will used to power the control panel of the DPE system. Propane will also be used as supplemental fuel to maintain the operating temperature in the thermal oxidizer of the DPE system. A general configuration of the facility, with locations of monitoring/extraction wells, is presented in Figure 2. Stratus conducted a web search (www.yahoo.com) to locate schools within a 1,000-foot radius of the site, and none were identified in the search area.

During the 20-day DPE event conducted in July 2004, the average soil vapor extraction was at 86 cfm (Test 4) at an average applied vacuum of 22.66 "Hg (or 308.18 "WC). The average concentrations of total petroleum hydrocarbons gasoline (TPHG), benzene, and methyl tertiary butyl ether (MTBE) were reported at 193.0 milligrams per cubic meter (mg/m^3), 0.65 mg/m^3, and 0.42 mg/m^3, respectively. Petroleum hydrocarbons or fuel oxygenates were not reported in either of the two effluent air samples collected during this event (Appendix B).

DPE SYSTEM START-UP AND OPERATION

During the system start-up, the following parameters will be monitored and recorded on field data sheets:

- Influent, operating, and effluent temperatures,
- Applied vacuum at the extraction well,
- Influent flow into the system, and
- Photo-ionization detector (PID) measurements for organic vapors from the extraction wells and effluent air.

In accordance with the BAAQMD Permit to Operate (PTO, dated July 26, 2004, condition 10), Stratus will collect one set of influent and effluent air samples within 24-hours of the start-up, and forward them to a state-certified laboratory for chemical analysis. The air samples will be analyzed on a 24-hour turnaround basis for TPHG by United States Environmental Protection Agency (USEPA) Method 8015, and for benzene, toluene, ethylbenzene, and total xylenes (BTEX), and MTBE by USEPA Method 8260. Analytical results and field data collected will be used to calculate and verify the destruction efficiency of the system.

REPORTING

Upon completion of the DPE event, and within 45-days of receipt of all analytical data, Stratus will prepare, and submit to BAAQMD, a DPE event summary report presenting the

analytical results of the vapor samples, volume of air extracted and treated, tabulated field observations, and destruction efficiencies of the system.

If you have any questions, please contact Kiran Nagaraju at (530) 676-6007.

Sincerely,

STRATUS ENVIRONMENTAL, INC.

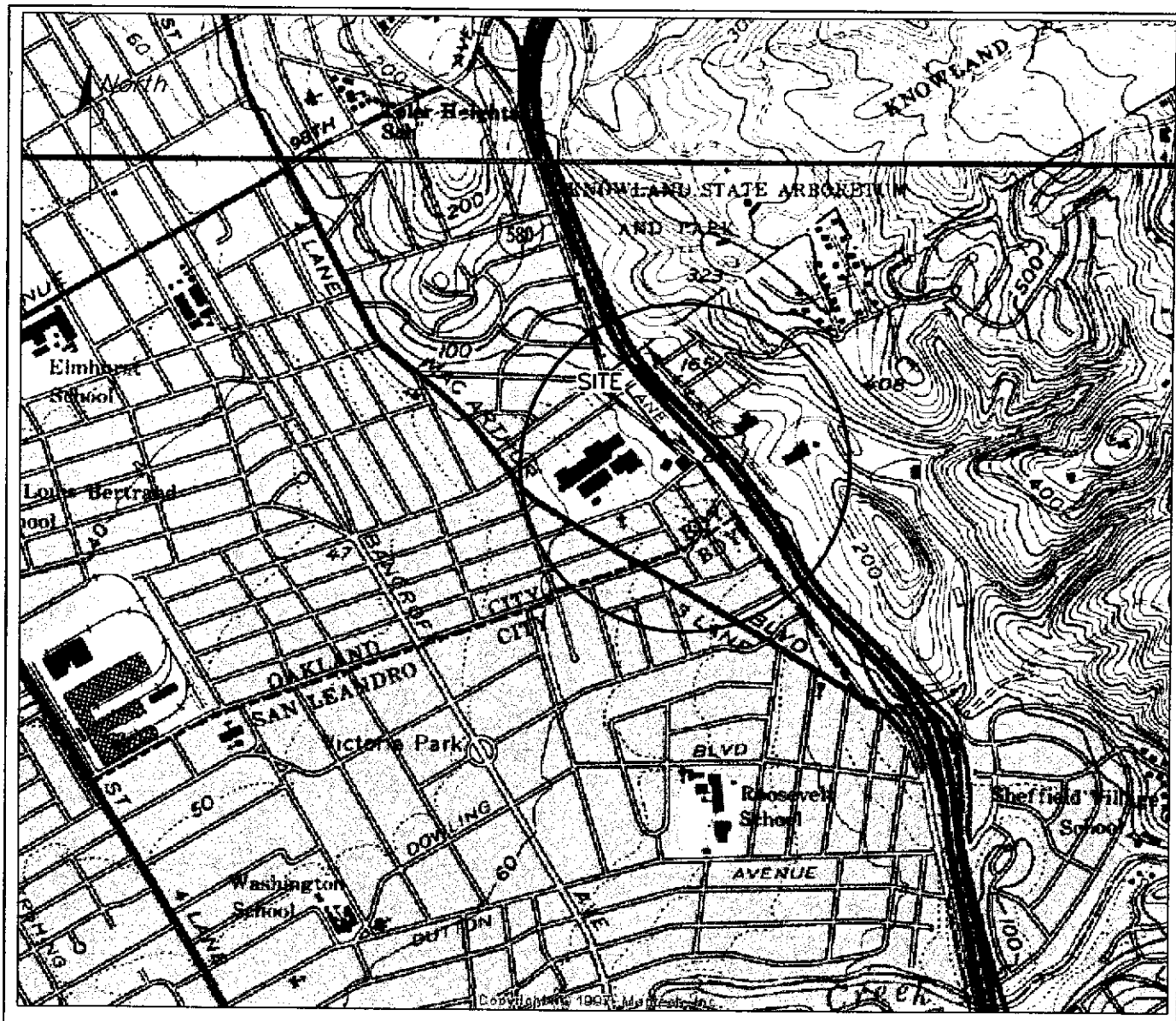
Kiran Nagaraju
Staff Engineer

Gowri S. Kowtha, P.E.
Project Manager

Attachments

Figure 1	Site Location Map
Figure 2	Site Plan
Figure 3	Process Flow Diagram
Appendix A	ACHCS Approval Letter
Appendix B	Tabulated Analytical Results

cc: Mr. Charles Miller, USA Gasoline Corporation
Mr. Amir Gholami, Alameda County Health Care Services
Mr. Ken Phares, Jay-Phares Corporation
Mr. Peter McIntyre, AEI Consultants



GENERAL NOTES:
BASE MAP FROM U.S.G.S.
OAKLAND, CA
7.5 MINUTE TOPOGRAPHIC
PHOTOREVISED 1980

QUADRANGLE LOCATION

0 2000 FT

SCALE 1:24,000

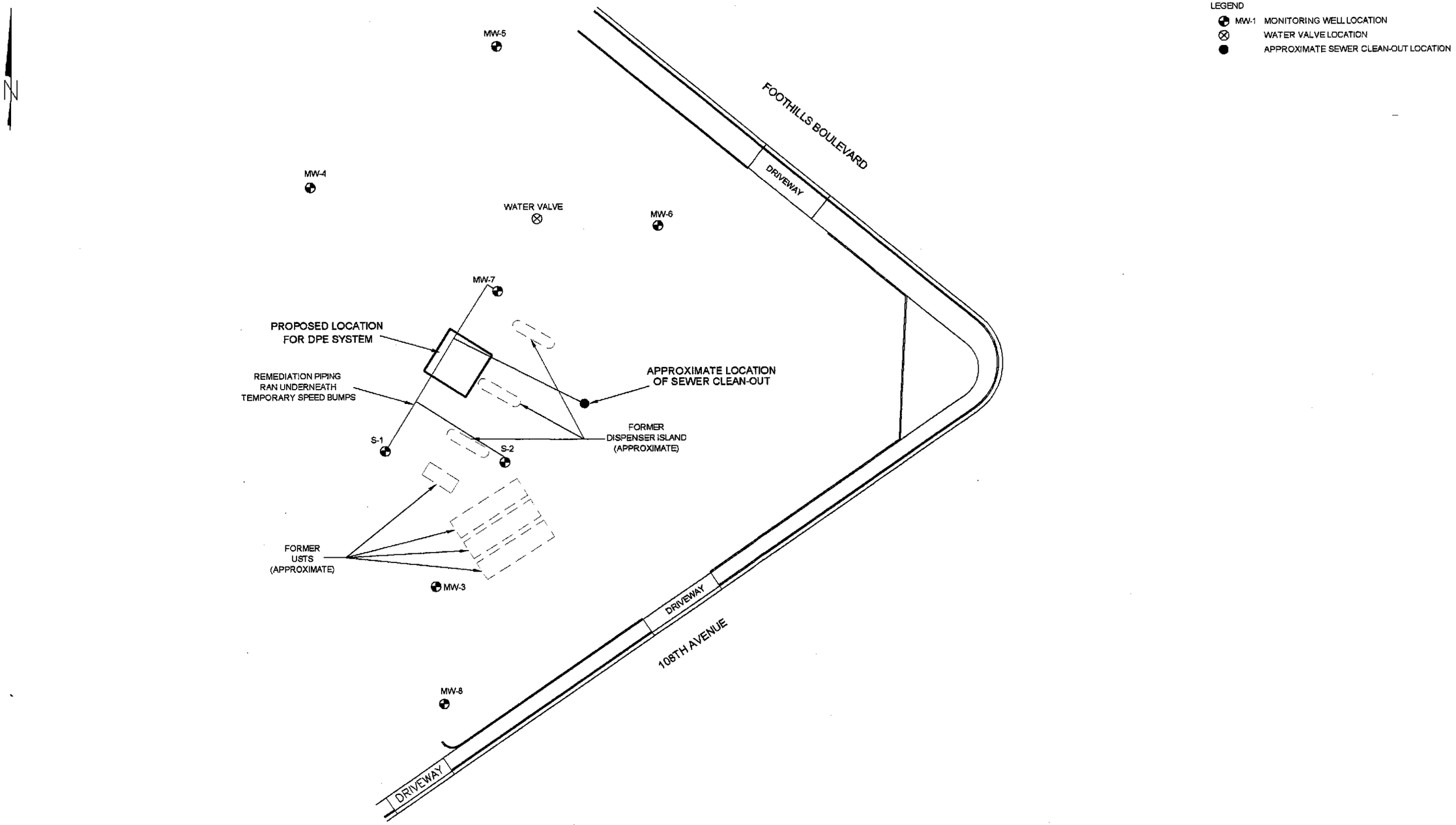
STRATUS
ENVIRONMENTAL, INC.

FORMER USA STATION NO. 57
10700 MACARTHUR BOULEVARD
OAKLAND, CALIFORNIA

SITE LOCATION MAP

FIGURE
1
PROJECT NO.
2007-0057-01

USA57 JMP May 16, 2005 USA 57Site Location Map.dwg



STRATUS
ENVIRONMENTAL, INC.

0 40 FT
HORZ. SCALE

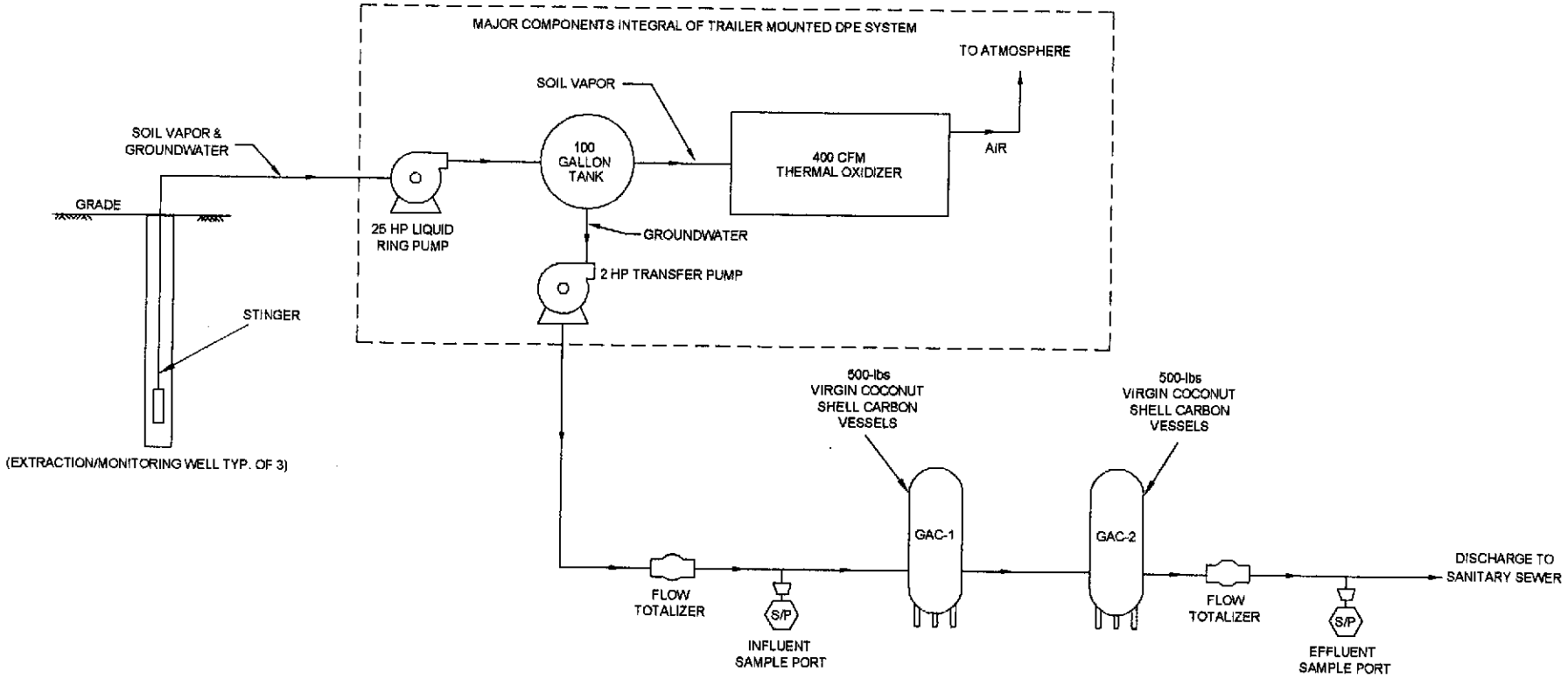
FORMER USA STATION NO. 57
10700 MACARTHUR BOULEVARD
OAKLAND, CALIFORNIA

SITE PLAN

FIGURE
2

PROJECT NO.
2007-0057-01

JMP REV May 20, 2005 USA 57 Site Plan.dwg
USA\57\Source



GROUNDWATER EXTRACTION & TREATMENT SYSTEM
NOT TO SCALE

THIS IS A PROCESS FLOW DIAGRAM, THEREFORE INSTRUMENTATION AND CONTROL EQUIPMENT DETAILS ARE NOT SHOWN.
INSTRUMENT FUNCTIONS AND INTERACTIONS ARE ALSO NOT SHOWN.
EQUIPMENT SIZES ARE NOT PROPORTIONAL AND ARE NOT INDICATIVE OF FINAL SIZES.

STRATUS ENVIRONMENTAL, INC.		FORMER USA STATION NO. 57 10700 MACARHTUR BOULEVARD OAKLAND, CALIFORNIA PROCESS FLOW DIAGRAM	FIGURE 3 PROJECT NO. 2007-0057-01

APPENDIX A

ACHCS APPROVAL LETTER

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

MAY 13 2005
COPY Scanned 589
cc: GK

2007-0057-01

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

RO0000232

May 9, 2005

Mr. Chuck Miller
USA Petroleum Corporation
30101 Aguora Court # 200
Agoura Hills, CA 91301

Mr. Hugh K. Phares & Mr. John Jay
Jay-Phares Corporation
10700 MacArthur Blvd.
Oakland, CA 94605

Re: USA 57 Petroleum, 10700 MacArthur Blvd., Oakland CA 94605

Dear Mr. Phares and Mr. Jay:

Alameda County Environmental Health has received and reviewed the "October 15, 2004, Dual Phase Extraction Test Report", by Mr. Gowri S. Kowtha Stratus Environmental Inc., along with other documents regarding the above referenced site.
As you are aware, this office have also had several meetings and or discussions with you and or your representatives as well, regarding the above referenced site. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- Per document in our files and the above report there were up to 580 ppb, 590 ppb, 150 ppb, 250 ppb, 990 ppb, and 17,000 ppb of MTBE, Benzene, Toluene, EthylBenzene, Xylenes, and TPHg respectively detected in groundwater during the last monitoring and sampling event. The highest concentration was observed in S-2 monitoring well.
- Groundwater fluctuation has been between 7 to 21 feet bgs historically.
- Flow gradient has been variable with flow gradient southwesterly above S-1 S-2 wells, northerly below S-1, S-2 wells, and southerly south of MW-3 well.
- This office concurs with the proposed workplan.

TECHNICAL REPORT REQUEST

Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

July 9,2005 Result of the Work Plan

These reports are being requested pursuant to California Health and Safety Code Section

25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

PERJURY STATEMENT

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

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

Professional Certification

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

AGENCY OVERSIGHT

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

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

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Gowri S. Kowtha, Stratus Environmental Inc., 3330 Cameron Park Drive, Suite 550, Cameron Park, CA 95682
D. Drogos, A. Gholami

APPENDIX B

TABULATED ANALYTICAL RESULTS

TABLE 5
SOIL VAPOR ANALYTICAL RESULTS
Former USA Station No. 57
10700 MacArthur Boulevard
Oakland, California

Sample Date	Sample Time	Sample ID	Sample Type	TPHG	Benzene	Toluene	Ethyl-benzene	Total Xylenes	MTBE
07/06/04	1030	Eff Air	Air	<12	<0.12	<0.12	<0.12	<0.12	<0.12
07/06/04	1032	Inf Cat Air	Air	**660**	**2.1**	**0.38**	**1.2**	**1.1**	**1.0**
07/07/04	0904	Inf Cat Air S-1	Air	<12	<0.12	<0.12	<0.12	<0.12	**0.29**
07/07/04	1126	Inf Cat Air MW-3	Air	<12	<0.12	<0.12	<0.12	<0.12	**0.13**
07/19/04	0641	Eff Air	Air	<12	<0.12	<0.12	<0.12	<0.12	<0.12
07/19/04	0644	Inf Cat Air	Air	**88**	**0.26**	<0.12	<0.12	**0.19**	**0.25**

All air sample values reported in milligrams per cubic meter (mg/m^3)

TPHG = Total petroleum hydrocarbons as gasoline
BTEX = Benzene, toluene, ethylbenzene, and total xylenes
MTBE = Methyl tertiary butyl ether

Analytical Laboratory
Alpha Analytical, Inc. (ELAP #2019)

Analytical Methods
TPHG analyzed by EPA Method SW8015B/DHS LUFT Manual
BTEX and MTBE analyzed by EPA Method SW8260B