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

SENT
8-28-06

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

August 25, 2006

Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Drive
Alameda, CA 94501

George and Diane Ososke
440 Davis Court, #910
San Francisco, CA 94111-2426

Subject: Fuel Leak Case No. RO0000260, Plaza Car Wash, 400 San Pablo Avenue, Albany, CA

Dear Mr. Stevens and Mr. and Ms. Ososke:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site, including the document entitled, "Work Plan for Additional Site Assessment – Second Revision at the Property," dated June 26, 2006 and received by ACEH on August 24, 2006. This Work Plan was prepared on your behalf by Enviro Soil Tech Consultants in response to ACEH correspondence dated October 21, 2005, March 17, 2006, and May 10, 2006. ACEH's October 21, 2005 correspondence identified numerous technical deficiencies in the previously submitted, "Proposed Work Plan for Additional Site Assessment at the Property," dated May 26, 2005. Although both the Site Conceptual Model and Revised Historical Events Reports contained major deficiencies, ACEH requested in the October 21, 2005 correspondence that you submit a revised Work Plan by December 21, 2005 that addresses the technical comments in the interest of moving the site investigation and cleanup forward. Since a Work Plan was not received by December 21, 2005, ACEH issued correspondence on March 17, 2006, again requesting that a revised Work Plan be submitted. Due to the lack of compliance with ACEH requests, ACEH also recommended that the Underground Storage Tank Cleanup Fund no longer reimburse you for future groundwater monitoring at this site until a revised Work Plan is submitted and approved to bring the site back into compliance. A document entitled, "Addendum to Previously Submitted Work Plan," dated April 12, 2006 was submitted to meet the requirement for a revised Work Plan but this document was also rejected due to technical deficiencies, which are described in our correspondence dated May 10, 2006. Our May 10, 2006 correspondence indicated that the site remains out of compliance until a revised Work Plan is approved.

Although the document entitled, "Work Plan for Additional Site Assessment – Second Revision at the Property," dated June 26, 2006 is missing several requested items, the proposed scope of work minimally meets ACEH requests. Therefore, the proposed work is to be implemented as long as the technical comments below are addressed during the field investigation. The site has conditionally been brought back into compliance with ACEH directives as long as the items requested in the technical comments are addressed during the investigation. If the requested items in the technical comments are not provided within the schedule outlined in the Technical Report Request, the site will again be out of compliance with ACEH directives.

In order to improve the quality of future work, we encourage you to review the numerous technical deficiencies in previous plans and reports, which have been identified repeatedly in ACEH correspondence. Please make any changes necessary to improve the quality of future work, move this project successfully forward, and avoid rejections of future submittals.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Hydraulic Conductivity Testing.** Laboratory hydraulic conductivity testing using ASTM Method D5084 is proposed for the site. Although the response indicates that an example of a laboratory report is enclosed, no reports were attached. We do not concur that this testing should be conducted at the site given the inferred low permeability of the soils and the lack of a specific application for the data. We recommend that the Underground Storage Tank Cleanup Fund not reimburse you if these tests are performed.

2. **Review of Reports.** The response to technical comment 6 indicates in the first paragraph that reports prepared by Subsurface Consultants and IT Corporation in 1989 and 1990 were reviewed as requested in ACEH's May 10, 2006 correspondence. However, in the second paragraph, the response states that the contents of a November 1989 report by Subsurface Consultants are unknown. Review of previous technical reports, particularly key reports such as the November 1989 SCI report, is a standard industry practice. The November 1989 SCI report presents observations of the sump excavation confirming that, "the storm drain and trench backfill act as a conduit, channeling contaminated groundwater to El Cerrito Creek." Previous work plans by Enviro Soil Tech have apparently not incorporated this finding, which has resulted in major gaps in planning and addressing investigation and cleanup for the site. ACEH will enclose a copy of this report in order to make Enviro Soil Tech aware of this key finding. However, we note that Enviro Soil Tech has been working on this site for 16 years and should have been aware of these findings.

3. **Monitoring Storm Drain Outfall to El Cerrito Creek.** You are directed to resume sampling of the storm drain outlet, approximately 20 feet up stream from the storm drain outlet, the confluence of the storm drain and El Cerrito Creek, and 50 feet downstream from the storm drain on a quarterly basis whenever sufficient flow is present within the storm drain outlet. This may require scheduling sampling events following significant rain events. Please present the initial results of the storm drain outfall sampling in the Soil and Groundwater Investigation Report requested below.

4. **Proposed Drilling Locations to Assess Storm Drain.** The three proposed soil boring locations in the area north of the manhole in Adams Street are acceptable. However, as discussed in technical comment 5 below, we request one additional soil boring on the west side of the storm drain. These direct push borings are to be advanced using the methods described in section 2.3.3 of the "Addendum to Previously Submitted Work Plan," dated April 12, 2006. The results are to be presented in the Soil and Groundwater Investigation Report requested below.

5. **Assessment of Groundwater Discharges to Storm Drain and Sampling of Adams Sump.** In our October 21, 2005 correspondence, we indicated that, "Contaminant transport to the storm drain is a significant pathway that must be considered. The current extent of contaminant discharges to the storm drain is a major data gap for this site that must be addressed." In our October 21, 2005 correspondence and during out meeting with you and Enviro Soil Tech at the site on June 6, 2006, we requested further information on past excavation and repair activities affecting the storm drain and maps showing the configuration of the storm drain and the repair activities. This information was not provided nor referenced in the Work Plan. Please present this information in the Soil and Groundwater Investigation Report requested below.

   In our May 10, 2006 correspondence, we requested that you collect water samples from the sump in Adams Street and describe the history of sampling and groundwater extraction from this sump. This information was also not provided. Based on observations during our meeting at the site on June 6, 2006, the sump ion Adams Street has apparently been removed. The June 26, 2006 response simply indicates that since the sump is no longer present, no sampling can be performed. Once again, we wish to emphasize that assessing the current extent of discharges to El Cerrito Creek along the storm drain and utility backfill is a major data gap that **must** be addressed. A response indicating the sump was removed with no further information and no proposal for investigation to address the data gap is inadequate. We request that one soil boring (GP-4) be advanced on the west side of the storm drain (see attached Revised Figure 1). Results from proposed borings GP-2 and GP-4 are to be compared to help assess whether the storm drain and utility backfill are acting as preferential pathways. These results are to be presented and discussed in the Soil and Groundwater Investigation Report requested below and further investigation proposed in order to address this data gap.

6. **Groundwater Monitoring.** Due to the lack of activity on this site, quarterly groundwater monitoring is to be suspended until the proposed site investigation is implemented according to the schedule below. We do not concur with continued groundwater monitoring until the field investigation is implemented. Sampling of all groundwater monitoring wells and El Cerrito Creek (see technical comment 3 above) is to be performed during or immediately following the proposed field investigation. Results of this groundwater sampling event are to be presented in the Soil and Groundwater Investigation Report requested below. Recommendations for groundwater monitoring are to be presented in the Soil and Groundwater Investigation Report.

7. **Geotracker.** A review of the Geotracker website indicates that not all of the required data have been submitted. Specifically, all analytical data are required to be submitted in specified EDF format. Depth to water data are to be reported in the GEO_WELL file whenever data is collected and survey information is to be submitted using the Geo_XY and GEO_Z_files. Please review the electronic data submittal requirements on the GeoTracker website (http://www.waterboards.ca.gov/ust/cleanup/electronic_reporting/report_rqmts.html) in order to correct any deficiencies.

TECHNICAL REPORT REQUEST

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

- **October 13, 2006** – Begin Proposed Field Investigation
- **November 3, 2006** – Complete Proposed Field Investigation
- **December 15, 2006** – Soil and Groundwater Investigation Report

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

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the 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 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).

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.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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.

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.

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 call me at (510) 567-6791.

Sincerely,

Jerry Wickham
Hazardous Materials Specialist

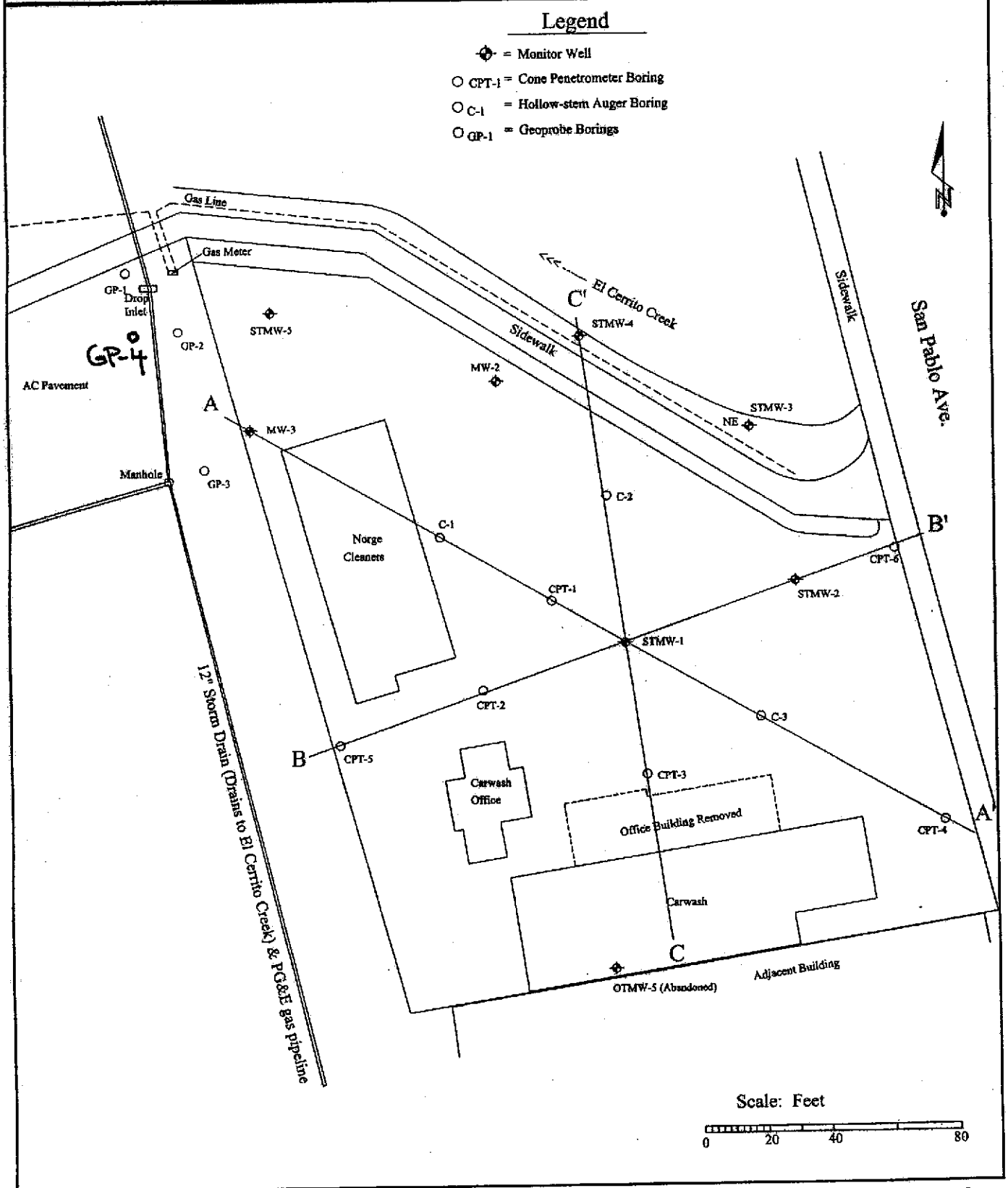
Attachment 1: Revised Figure 1
Attachment 2: Subsurface Consultants, Inc report dated November 7, 1989
Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Sunil Ramdass, SWRCB Cleanup Fund, 1001 I Street, 17th floor, Sacramento, CA 95814-2828 (w/ attachment 1 w/o attachment 2)
Shari Knierem, SWRCB Cleanup Fund, 1001 I Street, 17th floor, Sacramento, CA 95814-2828 (w/ attachment 1 w/o attachment 2)
Frank Hamedi-Fard, Enviro Soil Tech Consultants, 131 Tully Road, San Jose, CA 95111 (w/attachments 1 and 2)

Donna Drogos, ACEH (w/ attachment 1 w/o attachment 2)
Jerry Wickham, ACEH (w/ attachment 1 w/o attachment 2)
File

Revised Figure 1

Enviro Soil Tech Consultants	PROJECT Plaza Car Wash 400 San Pablo Ave Albany, California	Figure 1
131 Tully Road San Jose, CA 95112	PROJECT # 8-90-421-SI DATE: 6/27/2006	Proposed Wells



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

SGWT
05-1406

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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May 10, 2006

Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Drive
Alameda, CA 94501

George and Diane Ososke
440 Davis Court, #910
San Francisco, CA 94111-2426

Subject: Fuel Leak Case No. RO0000260, Plaza Car Wash, 400 San Pablo Avenue, Albany, CA

Dear Mr. Stevens and Mr. and Ms. Ososke:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site, including the document entitled, "Addendum to Previously Submitted Work Plan," dated April 12, 2006 (Work Plan) and received by ACEH on April 17, 2006. This Work Plan was prepared on your behalf by Enviro Soil Tech Consultants in response to ACEH correspondence dated October 21, 2005 and March 17, 2006. ACEH's October 21, 2005 correspondence identified numerous technical deficiencies in the previously submitted, "Proposed Work Plan for Additional Site Assessment at the Property," dated May 26, 2005. As directed in the October 21, 2005, you are not required to update the Site Conceptual Model or Revised Historical Events Report. Although both the Site Conceptual Model and Revised Historical Events Reports contained major deficiencies, ACEH requested in the October 21, 2005 correspondence that you submit a revised Work Plan by December 21, 2005 that addresses the technical comments in the interest of moving the site investigation and cleanup forward. Since a Work Plan was not received by December 21, 2005, ACEH issued correspondence on March 17, 2006, again requesting that a revised Work Plan be submitted. Due to the lack of compliance with ACEH requests, ACEH also recommended that the Underground Storage Tank Cleanup Fund no longer reimburse you for future groundwater monitoring at this site until a revised Work Plan is submitted and approved to bring the site back into compliance.

Due to the deficiencies discussed below, the "Addendum to Previously Submitted Work Plan," dated April 12, 2006 is rejected and the site remains out of compliance. The "Addendum to Previously Submitted Work Plan," proposes three hollow stem auger soil borings, five cone penetrometer borings, and installation of an unspecified number of monitoring wells along three transects to evaluate conditions within areas of known contamination. We have several technical comments regarding this proposed work to characterize the principal aquifer; however, the proposed scope of work is generally acceptable. The Work Plan also proposes five direct-push soil borings along the western boundary of the property to assess groundwater discharge to the storm drain and El Cerrito Creek. As discussed in the technical comments below, the Work Plan does not present sufficient or accurate background information to plan or review the proposed scope of work to assess the storm drain. Based on the technical comments below, the proposed

scope of work to assess the storm drain is rejected. Therefore, we request that you submit a revised Work Plan that addresses the technical comments below **by July 12, 2006.**

TECHNICAL COMMENTS

1. **Collection of Soil Samples in Soil Borings.** The Work Plan indicates that soil samples will be collected from the soil borings at 5-foot intervals and at lithologic contacts determined from the CPT logs. This approach is acceptable for the soil borings below a depth of 10 feet. Within the upper 10 feet, soil samples are to be collected continuously in order to observe potential contamination in the capillary fringe.

2. **Laboratory Analysis of Soil Samples.** The Work Plan indicates that soil samples will be selected for laboratory analysis, "no more than 10 feet apart." The use of a fixed interval for selecting soil samples for laboratory analysis is acceptable if contamination is not observed during field screening. If contamination is observed, soil samples are to be submitted for laboratory analyses for all depth intervals where the staining, odor, or elevated PID readings are observed. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval. In addition, one soil sample collected from the capillary fringe is to be analyzed from each soil boring.

3. **Laboratory Analytical Methods.** The Work Plan lists EPA methods 8015, 8020, and 8260 but does not specify the analysis. In addition, EPA Method 8020 has been replaced by EPA Method 8021. The soil samples are to be analyzed for total petroleum hydrocarbons as gasoline (TPHg) by EPM Method 8015M or 8260, BTEX, ethylene dibromide, 1,2-dichloroethane, and MTBE by EPA Method 8260B. The soil samples are also to be analyzed for total lead by EPA Method 6010B.

4. **Engineering Testing.** The Work Plan indicates that six soil samples will be sent to an engineering laboratory, "to determine the hydraulic conductivity." No description of the method or how these data would specifically be used is provided. .

5. **Well Screens.** The Work Plan appears to propose the installation of 15 feet of slotted casing in the proposed monitoring wells. However, the report also states that the slotting casing will extend, "from 20 to 15 feet below surface grade." We request that the well screens be no longer than 10 feet. For wells with static water levels approximately 7 feet bgs, the wells are to be constructed with screened intervals from approximately 5 to 15 feet bgs.

6. **Assessment of Groundwater Discharges to Storm Drain.** In our October 21, 2005 correspondence, we indicated that, "Contaminant transport to the storm drain is a significant pathway that must be considered. The current extent of contaminant discharges to the storm drain is a major data gap for this site that must be addressed." We also requested further information on past excavation and repair activities affecting the storm drain and maps showing the configuration of the storm drain and the repair activities. Section 2.3 of the revised Work Plan indicates that ESTC was unable to obtain information regarding the location or depth of the storm drain beyond what was reported in the Revised Historical

Events Report (May 2005). The information on the location and repairs to the storm drain in the Revised Historical Events Report consists of two paragraphs in the text and no maps or figures. This response and the proposed scope of work to assess the storm drain in section 2.3 of the Work Plan are inadequate. Maps and a diagram showing the depth, construction, and type of backfill for the storm drain have been presented in previous reports (Subsurface Consultants, Inc. November 7, 1989; International Technology Corporation, January 1990, February 3, 1990, and March 13, 1990). The above referenced reports were prepared for Kamur Industries; therefore, the response that ESTC was unable to obtain any information is not acceptable. The data provided in these reports are vital to planning any assessment of the storm drains. Please see technical comments 7, 8, and 9 below regarding further deficiencies in the proposed scope of work for the storm drain.

7. **Monitoring Storm Drain Outfall to El Cerrito Creek.** The revised Work Plan states, "The Regional Water Quality Control Board released Kamur Industries from further monitoring of the storm drain in 1990. Since then, no monitoring has taken place, although groundwater monitoring wells along the creek have detected little or no contamination." These statements are inaccurate. In addition, the reference to data from monitoring wells that are all upstream from the discharge point for the storm drain is misleading. Samples were collected periodically from the storm drain outlet and creek until January 1999. You are directed to resume sampling of the drain outlet, approximately 20 feet up stream from the storm drain outlet, the confluence of the storm drain and El Cerrito Creek, and 50 feet downstream from the storm drain following significant rain events. Please present plans to resume sampling of the discharges from the storm drain outfall and El Cerrito Creek in the revised Work Plan requested below.

8. **Proposed Drilling Locations to Assess Storm Drain.** The Work Plan proposes five direct-push soil borings along a portion of the western boundary of the property. Previous investigations and reports describing repairs to the storm drain have shown that groundwater discharges to the storm drain occurred north of the manhole in Adams Street that is west of Norge Cleaners. Therefore, it is not clear why ESTC would only propose soil borings south of the manhole. The map entitled, "Proposed Wells," (Figure 1) presented in the Work Plan lacks detail and does not cover the area northwest of Norge Cleaners, where groundwater discharges to the storm drain are known to have occurred. Soil borings are required in the area northwest of Norge Cleaners. Please review relevant data and reports as discussed in technical comment 6 and revise the plan to assess the storm drain. A minimum of three additional soil borings is required in the area north of the manhole in Adams Street. The attached Plate 3 presents three recommended boring locations in this area. In the revised Work Plan requested below, you are to use the reports referenced in technical comment 6 to prepare a detailed base map showing the storm drain, sump, previous sampling locations, proposed sampling locations, and other features related to the storm drain along the western boundary of the property and the area northwest of Norge Cleaners. Please present the base map and your plans to assess groundwater discharges to the storm drain in the revised Work Plan requested below.

9. **Sump in Adams Street.** The purpose of the sump that was installed adjacent to the storm drain in Adams Street was to lower water levels along the storm drain trench and to prevent discharge of groundwater to the storm drain. Please describe the history of sampling and groundwater extraction from this sump. In addition, the sump is to be sampled during the

proposed investigation and during future groundwater monitoring. Please include plans to sample the sump in the revised Work Plan requested below.

TECHNICAL REPORT REQUEST

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

- **July 12, 2006** – Revised 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.

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the 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 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.

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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 jerry.wickham@acgov.org.

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.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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.

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.

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 call me at (510) 567-6791.

Sincerely,

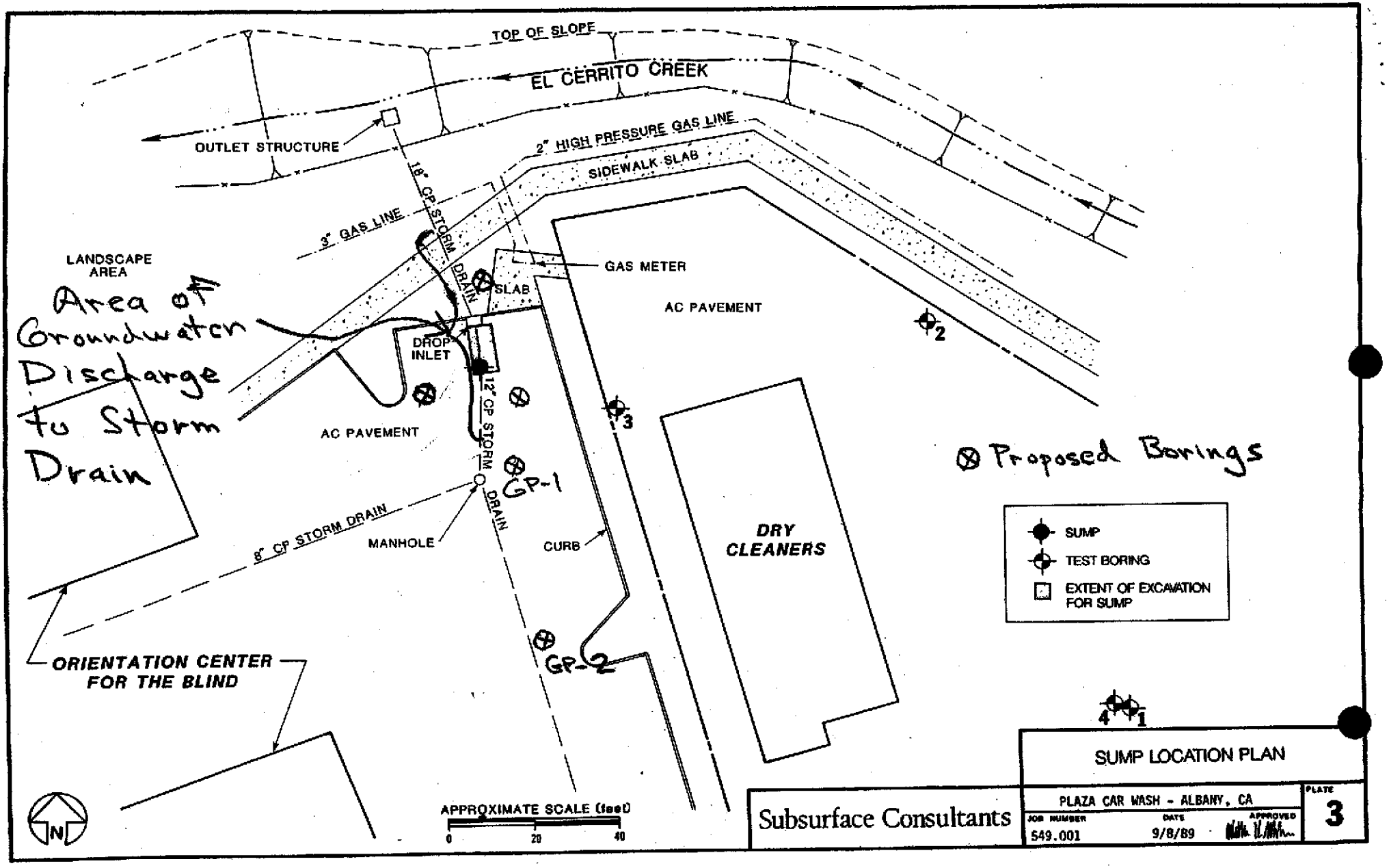
Jerry Wickham
Hazardous Materials Specialist

Attachment: Sump Location Plan with Recommended Soil Boring Locations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Sunil Ramdass, SWRCB Cleanup Fund, 1001 I Street, 17th floor, Sacramento, CA 95814-2828
Shari Knierem, SWRCB Cleanup Fund, 1001 I Street, 17th floor, Sacramento, CA 95814-2828
Frank Hamedi-Fard, Enviro Soil Tech Consultants, 131 Tully Road, San Jose, CA 95111

Donna Drogos, ACEH
Jerry Wickham, ACEH
File



SUMP LOCATION PLAN

Subsurface Consultants

PLAZA CAR WASH - ALBANY, CA

JOB NUMBER	DATE	APPROVED
549.001	9/8/89	

PLATE 3

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

SENT 03-20-06

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

March 17, 2006

Ms. Brenda Gaudic, Manager
Diablo Engine & Machine
6355 Scarlett Ct. #11
Dublin, CA 94568

RE: Inspection

Dear Ms. Gaudic:

Please sign the enclosed Inspection Report Summary/Summary of Violations for the inspection I performed at your facility on March 14, 2006. After signing, return it back to me to put into your facility file.

If you have any questions, please contact me at Lawrence.seto@acgov.org or 510-567-6774.

Sincerely,

Larry Seto
Sr. Hazardous Materials Specialist

Cc: Alvin Whitaker, Business Owner

ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH

Certified Unified Program Agency (CUPA)

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

INSPECTION REPORT SUMMARY / SUMMARY OF VIOLATIONS

Facility Name: Diablo Engine & Machine Co. Inc.	
Facility Address : 6355 Scarlett Ct. #11, Dublin	
Contact Person: Brenden Gaudio	*Telephone:* 925-828-0222
Type of Business: Auto Machine Shop	

UNIFIED PROGRAM SUMMARY	Program	Inspection	COMMENTS
Hazardous Materials Business Plan	✓	3/14/06	
Risk Management Plan / CalARP			
Underground Storage Tank			
Aboveground Petroleum Storage Tank			
Does the facility have an SPCC Plan?			
Hazardous Waste Generator	✓	3/14/06	
Universal Waste			
Tiered Permit: Permit-by-Rule			
Conditionally Authorized			
Conditionally Exempt, Specified Waste Stream			
Conditionally Exempt, Small Quantity Treatment			
Conditionally Exempt, Limited			
Conditionally Exempt, Commercial Laundry			

INSPECTION CHECKLISTS COMPLETED AND ATTACHED

- ☒ HMBP Inspection Checklist
- ☒ Hazardous Waste Generator Inspection Checklist
- ☐ Tiered Permit Inspection Checklist
- ☐ Underground Storage Tank Checklist(s)
- ☐ Inspection Notes
- ☐ Inspection Narrative

Did a facility representative grant permission for this inspection? ☒ YES ☐ NO

Submit all required documents, reports and/or plans (including Corrective Action Plan) within _____ days.

All violations noted are to be corrected immediately. Compliance will be verified on or after _____

Failure to comply with requirements established in this inspection report and in all attachments to this report, or in subsequent correspondence may result in the issuance of a Notice of Noncompliance. Noncompliance is punishable by criminal and/or civil penalties under applicable local, state and/or federal laws or regulations.

3-14-06 — *Date of Inspection*

Larry Seto — *Inspector*

Signature of Facility Representative

ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH
Certified Unified Program Agency (CUPA)

INSPECTION REPORT SUMMARY / SUMMARY OF VIOLATIONS
NARRATIVE

Facility Name: Diablo Engine and Machine Co., Inc.
Facility Address: 6355 Scarlett Ct. #11, Dublin

This facility performs machining of engine blocks. Used oil and motor oil stored in 55 gal drums are stored inside secondary containment.
There are three hot tanks on site that are currently being used.

Summary of Violations

1) Update Hazardous Materials Business Plan has not been submitted to Environmental Health - submit your updated plan by 3/31/06

2) Used pet drum and used oil drums are not closed - keep these drums closed except during transfer of contents

3) Completed manifest not available for review - Contact your hauler and request a copy of the manifests with the third signature for the manifests that do not have it in your file.

4) American Valley Waste Oil is using an incorrect EPA # for your facility - Contact them and give them your correct number.

Date of Inspection: 3/14/06
Inspector: Carry Seto
Signature of Facility Representative:

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

SENT 03-20-06

ENVIRONMENTAL HEALTH SERVICES
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March 17, 2006

Murray Stevens
Kamur Industries, Inc.
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Alameda, CA 94501

George and Diane Ososke
440 Davis Court, #910
San Francisco, CA 94111-2426

Subject: Fuel Leak Case No. RO0000260, Plaza Car Wash, 400 San Pablo Avenue, Albany, CA

Dear Mr. Stevens and Mr. and Ms. Ososke:

Alameda County Environmental Health (ACEH) staff previously requested in correspondence dated October 21, 2005 (copy attached) that you submit a Revised Work Plan to complete site characterization for your site by December 21, 2005. To date, we have not received a Work Plan or a request for a schedule extension. **Your site is out of compliance with directives from this agency.** In reviewing the case file, we also note that the current failure to submit a revised Work Plan by December 21, 2005 is one of a series of occasions on which you have failed to implement work and submit reports within the established schedule.

In order for your site to return to compliance, please **submit the previously requested Revised Work Plan by April 17, 2006.** This date is not an extension of your due date, reports for this site are late and your site is out of compliance. ACEH's October 21, 2005 correspondence, which describes the requirements for the work, is included as an attachment. As directed in the October 21, 2005, you are not required to update the Site Conceptual Model or Revised Historical Events Report. Although both the Site Conceptual Model and Revised Historical Events Reports contained major deficiencies, ACEH requested in the October 21, 2005 correspondence that you submit a revised Work Plan that addresses the technical comments in the interest of moving the site investigation and cleanup forward.

On January 24, 2006, ACEH received a report entitled, "Fourth Quarter of 2005 Groundwater Monitoring and Sampling at the Property Located at 400 San Pablo Avenue, Albany, California," dated December 30, 2005. Due to the lack of compliance with ACEH requests, ACEH recommends that the Underground Storage Tank Cleanup Fund no longer reimburse you for future groundwater monitoring at this site until a revised Work Plan is submitted and approved and the site is brought back into compliance.

Please note that we have started the enforcement process on this case by requesting a revocation of your eligibility to receive grant money from the state's Underground Storage Tank Fund (Senate Bill 2004) to reimburse you for the cost of investigation and cleanup. Further delays in investigation, late reports, or enforcement actions may result in referral of 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.

The Fourth Quarter of 2005 Monitoring Report presents recommendations regarding the obligation to monitor and investigate chlorinated hydrocarbons in the vicinity of Norge Cleaners. Please note that the presence of dissolved chlorinated hydrocarbons in the vicinity of Norge Cleaners does not relieve you of the obligation to investigate and remediate fuel hydrocarbons released from the former USTs at the Plaza Car Wash. Fuel hydrocarbon contamination extends into the northwestern portion of the site beyond Norge Cleaners and is co-mingled with dissolved chlorinated hydrocarbons in the vicinity of Norge Cleaners. In addition, fuel hydrocarbons were discharged to El Cerrito Creek at the northwestern boundary of the property, well beyond Norge Cleaners. Several data gaps regarding the extent of fuel hydrocarbons and in particular, the potential ongoing discharge of fuel hydrocarbons to El Cerrito Creek was identified in ACEH's October 21, 2005 correspondence. Once again, we request that you prepare a Work Plan to address these data gaps related to the fuel hydrocarbon release from Plaza Car Wash.

Norge Dry Cleaners and Plaza Car Wash are both within the parcel number 66-2761-10, which is owned by George and June Ososke, who are responsible parties for this case. Please identify any additional responsible parties for chlorinated hydrocarbon discharges from Norge Dry Cleaners. Investigation of the co-mingled fuel hydrocarbon and chlorinated hydrocarbons plumes in the vicinity of Norge Cleaners is to include analysis for both fuel hydrocarbons and chlorinated hydrocarbons. It is up to the responsible parties for each of the releases to arrange among themselves the apportionment of their respective costs for this work.

TECHNICAL REPORT REQUEST

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

- **April 17, 2006** – Revised 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.

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the 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 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 jerry.wickham@acgov.org.

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.

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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.

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If you have any questions, please call me at (510) 567-6791.

Sincerely,

Jerry Wickham
Hazardous Materials Specialist

Attachment: ACEH Correspondence Dated October 21, 2005

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Sunil Ramdass, SWRCB Cleanup Fund, 1001 I Street, 17th floor, Sacramento, CA 95814-2828
Shari Knierem, SWRCB Cleanup Fund, 1001 I Street, 17th floor, Sacramento, CA 95814-2828
Frank Hamedi-Fard, Enviro Soil Tech Consultants, 131 Tully Road, San Jose, CA 95112

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

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

SENT 10-24-05

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

October 21, 2005

Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Drive
Alameda, CA 94501

George and Diane Ososke
440 Davis Court, #910
San Francisco, CA 94111-2426

Subject: Fuel Leak Case No. RO0000260, Plaza Car Wash, 400 San Pablo Avenue, Albany, CA

Dear Mr. Stevens and Mr. and Ms. Ososke:

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ACEH staff met with Mr. Frank Hamedi-Fard and Mr. Victor Cherven of Enviro Soil Tech on October 13, 2005 to discuss issues related to the three documents referenced above. Although the "Site Conceptual Model" and "Revised Historical Events Report" have several inadequacies, the most significant of which are discussed in the technical comments below, we are not requesting that these reports be revised again at this time. In the interest of moving the project forward, we request that a revised work plan be submitted that incorporates responses to the technical comments below. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS ON SITE CONCEPTUAL MODEL (FEBRUARY 17, 2005)

1. **Northern Plume.** The SCM proposes that northern and southern plumes, which apparently originated from two separate sources, are currently co-mingled at the site. The SCM goes on to indicate that the northern plume originated from the area of Norge Cleaners and was related to a discharge to El Cerrito Creek in 1989. This proposal seems largely inconsistent

with the description of the 1989 discharge to El Cerrito Creek. On July 3, 1989 a non-aqueous liquid hydrocarbon was observed floating in El Cerrito Creek. The observation of floating non-aqueous hydrocarbons is consistent with a fuel release from a UST system but is not consistent with the release of chlorinated solvents from a dry cleaning facility. No source of petroleum hydrocarbons has been identified near Norge Cleaners. Please propose a scope of work in the revised work plan requested below, to determine the nature, extent, and source of groundwater contamination in the northwestern portion of the site.

2. **Vertical Extent of Contamination.** The vertical extent of contamination has not been defined for the site. Please see comment 2 on the Work Plan regarding future work to define the vertical extent of contamination.

3. **Discharges to Storm Drain.** Figure 8 of the SCM shows discharges from Norge Cleaners and the USTs entering the storm drain west of the site. This storm drain flows directly to El Cerrito Creek. However, the SCM does not identify possible discharges to the storm drain as a data gap. Contaminant transport to the storm drain is a significant pathway that must be considered. The current extent of contaminant discharges to the storm drain is a major data gap for this site that must be addressed. Please see technical comment 6 on the Work Plan.

4. **Preferential Pathways.** The SCM does not include a discussion of potential preferential pathways other than the storm drain west of the site. Please include a discussion of other potential preferential pathways in the revised work plan requested below and propose a scope of work to investigate the preferential pathways where necessary.

5. **Recommendations.** Additional investigation activities are recommended in the SCM and are included in the Work Plan. Please see the discussion of these recommended investigation activities in the technical comments on the Work Plan below.

TECHNICAL COMMENTS ON REVISED HISTORIC EVENTS REPORT (MAY 13, 2005)

1. **References.** The Historic Events Report does not cite references or other sources for the information presented. Therefore, it is difficult to research the cited information or assess the reliability of the stated conclusions. Future documents that include a summary of historic events, are to adequately describe the sources of the information and/or include references.

2. **Figures.** The locations of specific boring locations are inconsistent between Figures 2 through 5 and Drawing 1. On Figures 3 and 4, abandoned wells MW-1 and MW-4 are shown within the overexcavation area but appear outside the overexcavation area on Drawing 1. Boring B-2, shown near the northeastern corner of the overexcavation area on Figures 2 through 5, is labeled boring B-4 on Drawing 1. Please correct these inconsistencies in future document submittals.

3. **Description of Storm Drain Discharges and Repairs.** The description of the storm drain discharges and repair is inadequate and does not include a map to show where any of the activities occurred. The text indicates that joints in the drainpipe were sealed but does not describe the length or location of the pipe that was sealed. The storm drain line may have also been exposed at a different time for installation of a utility line by Pacific Gas & Electric. However, this event and any information that may have been obtained regarding the storm

drain are not described in the Historic Events Report. Please include information to address this technical comment in the revised work plan requested below.

TECHNICAL COMMENTS ON PROPOSED WORK PLAN FOR ADDITIONAL SITE ASSESSMENT (MAY 26, 2005)

1. **Work Plan Revision.** The Work Plan does not address several significant data gaps for the site and does not provide sufficient rationale for the proposed activities. Therefore, ACEH requests that a revised work plan be submitted that addresses all of the technical comments presented in this correspondence.

2. **Characterize the Principal Aquifer at the Site.** The Work Plan proposes to install three soil borings in the northern portion of the site to "resolve uncertainties regarding the nature and geometry of the shallowest groundwater-bearing zone beneath the site." The Work Plan proposes continuous soil sampling and indicates that, "other samples may be transported to an analytical laboratory." However, the criteria that will be used to select soil samples for analytical testing and the method to assess whether the lower water-bearing zone has been affected are not described. In the revised work plan requested below, please expand the discussion to fully describe the criteria and methods that will be used to select depth intervals for soil and groundwater sampling. In addition, the revised work plan is to include a scope of work to assess the vertical extent of contamination in more than one area of the site. Please consider relevant regional information or information from nearby sites in developing the revised work plan.

3. **Proposed Boring Locations.** Proposed boring locations are not shown on the figures in the Work Plan. The Work Plan refers to proposed locations on Figure 2 but no Figure 2 is included with the work plan. The proposed boring locations on Figure 30 of the SCM appear to be consistent with the proposed locations discussed in the Work Plan. Please include maps showing all proposed sampling locations in the revised work plan requested below.

4. **Install Additional Monitoring Well.** Installation of one additional monitoring well is proposed in the area west of the car wash office to monitor the "downgradient extent of groundwater contamination." ACEH has no objection to the installation of a monitoring well west of the car wash office. However, please consider the use of grab groundwater samples to delineate the extent of contamination prior to well installation. Present your plans in the revised work plan requested below.

5. **Complete Mass Balance and Fate and Transport Analyses.** The Work Plan indicates that the mass of hydrocarbons in soil and groundwater will be estimated using maps of the soil and groundwater contaminant plumes and also indicates that numeric fate and transport analysis will be conducted. Making an estimate of the mass of petroleum hydrocarbons in soil and groundwater within specific depth intervals is acceptable. As the Work Plan indicates, fate and transport models are complex and require a variety of data for input. The use of numeric fate and transport models should only be conducted after the basic conditions that control contaminant fate and transport have been investigated and a basic understanding has been achieved. Numeric fate and transport modeling is not justified for this site until a better basic understanding of groundwater flow conditions is developed.

6. **Discharges to Storm Drain.** Although the SCM indicates that discharges to the storm drain are occurring, the Work Plan does not include plans to investigate or monitor discharges to the storm drain. As indicated in technical comment 3 above on the Revised Historic Events Report, further information must be provided on past activities and the configuration of the storm drain. The revised work plan must provide additional background information on the storm drain, including a full description of past excavation and repair activities affecting the storm drain. In addition, information on the depth and construction of the storm drain along with maps showing locations of any features discussed must be presented. The revised work plan requested below must propose investigation activities to assess potential discharges to the storm drain and must propose monitoring of the storm drain outflow to El Cerrito Creek.

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

- **December 21, 2005** – Revised Work Plan

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Jerry Wickham
Hazardous Materials Specialist

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Donna Drogos, ACEH
Jerry Wickham, ACEH

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

October 21, 2005

Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Drive
Alameda, CA 94501

George and Diane Ososke
440 Davis Court, #910
San Francisco, CA 94111-2426

Subject: Fuel Leak Case No. [redacted] Plaza Car Wash, 400 San Pablo Avenue, Albany, CA

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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 call me at (510) 567-6791.

Sincerely,

Jerry Wickham

Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Sunil Ramdass, SWRCB Cleanup Fund, 1001 I Street, 17th floor, Sacramento, CA 95814-2828
Frank Hamedi-Fard, Enviro Soil Tech Consultants, 131 Tully Road, San Jose, CA 95112

Donna Drogos, ACEH
Jerry Wickham, ACEH

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

SCM 11-07-04

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

November 15, 2004

Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Dr.
Alameda, CA 94501-6228

George & June Ososke
George & June Ososke Trust
110 Crown Road
Kentfield, CA 94909

Subject: Fuel Leak Case No. RO0000260, Plaza Car Wash, 400 San Pablo Avenue, Albany, California – Report Review Findings and Request for Conceptual Site Model and Workplan

Dear Mssrs. Stevens and Ososke:

Alameda County Environmental Health (ACEH) has reviewed the October 1, 2003, *Historical Events Report* prepared by Enviro Soil Tech Consultants and the case file for the above-referenced site. The *Historical Events Report* does not adequately respond to ACEH's July 30, 2003 or August 15, 2003 requests, and is unacceptable. Enviro Soil Tech's report does not coherently summarize the available data nor does it present objectives or rationale supporting the proposed investigation tasks. Significantly, the supporting documentation (maps, tables and cross-sections) does not meet industry standards for professional work. We request that you prepare a site conceptual model which describes and graphically depicts the geographic distribution of residual contamination at the site. We request that you submit your SCM together with a workplan for any necessary additional site characterization. Both portions of the document must be in conformance with published guidance documents and industry standards. Further specifics describing our rationale for not accepting the report, and detailing our SCM and workplan requests are presented below.

TECHNICAL COMMENTS

1. Report Narrative

The narrative report text needs to summarize the site conditions for the purposes of i) explaining the distribution of contamination in the subsurface, and ii) providing the rationale supporting your proposed corrective action. The report narrative does not meet industry standards. Our reasons for this determination and for requesting a replacement site conceptual model include the following:

A. The purpose of the report requested by ACEH on August 15, 2003 is to compile, summarize and analyze existing data and present a rationale for the tasks necessary to advance the site towards case closure. Your report does not comply with this request. The compilation is incomplete; the summary is incoherent; and the analysis is missing.

B. The third report section "Background and Investigation Chronology" does not show the reader the value of the past sampling toward the goal of defining the extent of subsurface contamination. The investigation chronology needs to briefly identify past investigation phases and summarize how each phase of work built on previous phases to improve understanding of site conditions and to address data gaps.

C. The fourth report section is entitled "Subsurface Soil Formation." We question your consultant's use of geologic terminology: is Enviro Soil Tech suggesting that soil is being created under the site? Additionally, this section is not acceptable because it does not present a summary *interpretation* of the lithologic data collected to date. We request that you evaluate all boring logs and other lithologic data for the site and identify patterns or trends in this data which would influence the migration of chemicals in the subsurface. In addition, we recommend that you evaluate the likely depositional environment to provide rationale supporting the perceived patterns or trends in lithologic variation across the site. Your evaluation of the site geology will guide assessment of the fuel and solvent releases.

D. Under "Site Hydrogeology," Enviro Soil Tech states, "The groundwater directions were fluctuated from easterly to northerly, westerly and southerly since 1990." This statement does not explain historical variation in groundwater flow direction or provide an evaluation which would help explain the distribution of contaminants at the site. Overall, your consultant's summary is incoherent.

E. The report sections entitled "Soil Condition" and "Water Condition" do not describe the geographic or concentration distribution of chemicals in the subsurface. These sections need to summarize the existing data and identify areas where additional data is needed to complete delineation of the subsurface contamination.

F. Under "Water Condition," Enviro Soil Tech recommended a series of actions. Your July 14, 2004, letter claimed that the series of recommended actions constituted a workplan. Enviro Soil Tech's recommendations do not constitute a workplan. Please refer to the following documents for guidance in preparation of an acceptable workplan: State Water Resource Control Board Resolution 92-49 (II, A, 6), *Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304*; and *Guidelines For Hydrogeologic Characterization At Hazardous Substances Release Sites*, Vol. 1 : Field Investigation Manual, Cal EPA, July 1995.

2. Summary Tables

The objective of summary tables is to present all site data in a format which facilitates evaluation of chemical concentrations across the site and evaluation of time series. Tables 1, 2 and 3 do not achieve these objectives. We request that you compile the summary tables organizing the data in chemical-specific columns as was performed in Table 4 (pages T4-1 through T4-14). The report contains two tables identified as "Table 4." The second Table 4 (pages T4-14 through T4-19) also needs to be reformatted to facilitate comparison of sample results for each chemical.

3. Summary Figures

We recommend that historical sampling locations be presented on a single site map. We require that additional figures be used to present groundwater flow direction, the geographic distribution of representative chemicals of concern, areas of historical remediation and proposed additional sampling locations. A number of the figures do not meet industry standards. Specific figures and

our reasons for this determination and for requesting a replacement site conceptual model include the following:

A. Figures 2, 3, 4, and 5 are all entitled "Excavation and Soil Sample Summary." The titles are misleading, and none of the four figures provides a comprehensive summary as each figure contains slightly different data. When looking for sample locations from the tables, it is not clear to which figure the reader should refer. The results presented in Table 2 do not appear to be presented on any of the figures.

B. A single figure needs to represent the series of excavations performed at the site. We require that sample locations representative of soil which was subsequently removed from the site during excavation be clearly distinguishable from sample locations which would be representative of current conditions.

C. The cross section locations, rose diagram and proposed future boring locations appear to be randomly plotted on various figures. A typical series of figures would include i) a site plan with all sampling locations and site features, ii) map(s) of soil analytical data for each appropriate depth range, iii) a figure showing groundwater elevation contours and monitoring well locations, iv) map(s) of groundwater analytical data for each appropriate depth range, v) a single figure showing all historical excavations, and vi) a figure presenting proposed future work.

D. The groundwater flow direction rose diagrams show no discrimination between various events or other attempt at interpretation. It seems highly unlikely that there is not a pattern to the direction of groundwater flow. The presented figure suggests that over time, groundwater radiates out from the site. This seems implausible. Your report needs to provide rationale for this finding.

E. The cross-sections are poorly drawn hand-sketches and present minimal interpretation. The objective of a cross-section is to interpret the subsurface hydrogeology (including lithology and groundwater occurrence) from a series of sampling points. For environmental investigations the focus should be on identifying zones where contaminant occurrence and/or migration are likely. Cross section B-B' includes lines drawn to correlate depths where sampling runs changed rather than depicting site geology, and as such are not cross-sections. We do not understand why groundwater elevations were contoured when groundwater elevation change is thought to be the result of seasonal variation, and not related to spatial variation in occurrence across the site. There is no reference on the cross-sections, or in the report text, identifying the surface traces of the cross-sections.

F. An incomplete set of boring logs for the site is presented. We request a set of copies of all historical boring logs. Guidance for appropriate field logging during drilling can be found in *Drilling, Coring, Sampling and Logging at Hazardous Substance Release Sites, Guidance Manual for Ground Water Investigations*, Cal EPA, July 1995.

TECHNICAL REPORT REQUESTS

1. Site Conceptual Model

ACEH requests a Site Conceptual Model (SCM) that illustrates the relationship between contaminants, retention/transport media, and receptors. The SCM should incorporate all aspects of the contaminant release investigation, and should cover site geology, hydrogeology, release and cleanup history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors. The SCM

is developed using readily available (existing) data and is used to identify data gaps that are subsequently filled as the investigation proceeds. Investigations continue until the SCM is not likely to significantly change upon collection of additional information, and the SCM is said to be "validated." By clarifying major site issues, the validated SCM forms the foundation for developing the most cost-effective corrective action plan and will help move the case towards closure.

Technical guidance for developing SCMs is presented in ASTM 1689-95(2003)e1 *Standard Guide for Developing Conceptual Site Models for Contaminated Sties;* American Petroleum Institute Publication No. 4699 *Strategies for Characterizing Subsurface Releases of Gasoline Containing MTBE*, dated February 2000; EPA 510-B-97-001 *Expedited Site Assessment Tools for Underground Storage Tank Sites: A Guide for Regulators*, dated March 1997; State Water Resources Control Board's *Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Appendix C,* dated March 27, 2000; and *Using Dynamic Field Activities for On-Site Decision Making: A Guide for Project Managers*, U.S. Environmental Protection Agency, OSWER, May 2003.

At a minimum, the SCM for this project is to include the following:

G. A concise narrative discussion of the regional geologic and hydrogeologic setting. Include a list of technical references you reviewed.

H. A concise discussion of the on-site and off-site geology, hydrogeology, release source and history, secondary source areas, remediation status, risk assessment, plume migration, attenuation mechanisms, preferential pathways, and potential threat to downgradient receptors. The SCM shall include an analysis of the hydraulic flow system at and downgradient from the site.

I. Local and regional maps showing location of sources, extent of soil and groundwater contamination for appropriate depth intervals (i.e., interpretive drawings and depth-specific isoconcentration maps—not plots of laboratory results), rose diagram of recent and historical groundwater gradients, and locations of receptors. "Receptors" include, but are not limited to, all supply wells and surface water bodies within 2000 feet of the source area, and all potentially impacted schools, hospitals, daycare facilities, residences, and other areas of heightened concern for vapor impact.

J. Geologic cross-sections (parallel and perpendicular to the contaminant plume axis) which include subsurface geologic features, depth to groundwater, man-made conduits, soil boring and sampling locations, monitoring well construction, and an interpretive drawing of the vertical extent of soil and groundwater contamination (i.e., an interpretive drawing—not a plot of laboratory results).

K. Exposure evaluation flowchart (similar to Figure 2 in ASTM's Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites).

L. Plots of chemical concentrations vs. time and vs. distance from the source. Plots should be shown for each monitoring well which has had detectable levels of contaminants.

M. Summary tables of chemical concentrations in each historically sampled media (including soil, groundwater and soil vapor).

N. Boring and well logs (including construction/screening), and a summary table indicating construction specifications for each monitoring and extraction well.

O. Identification and listing of specific data gaps that require further investigation during subsequent phases of work.

P. Proposed activities to investigate and fill data gaps identified above.

2. Site Characterization

Residual soil and groundwater contamination at the site needs to be fully characterized. We request that you characterize the residual contamination from the fuel and dry cleaning solvent releases. These separate releases appear to be from distinct onsite sources; and fate and transport of petroleum hydrocarbons in the subsurface is typically different from that of chlorinated solvents. Accordingly, we request that your workplan propose investigation efforts to address each release, and we request that you propose investigation techniques which are appropriate to the respective chemical targets. Supporting documentation to your workplan needs to include summary figures which identify the various sources and which depict the current understanding of the three-dimensional extent of contamination for each chemical class.

REQUEST SCHEDULE

Please submit an *Additional Investigation Workplan* containing the SCM requested above by **January 15, 2005**. ACEH makes this request pursuant to California Health & Safety Code Section 25296.10. CCR Title 23 Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to a reportable unauthorized release from a petroleum UST system, and require your compliance with this request.

COVER LETTERS

All workplans and technical reports submitted to ACEH must be accompanied by a cover letter from the responsible party that states the following: "I declare under penalty of perjury, that the information and/or recommendations contained in the attached proposal or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company.

PROFESSIONAL CERTIFICATION

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that workplans 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. Please note that 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. Work at your site is required to be designed, interpreted, and overseen by the appropriately registered professional.

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 County District Attorney or other appropriate agency, for enforcement. California Health and Safety Code, Section 25299.76 authorizes ACEH enforcement including administrative action or monetary penalties of up to $10,000 per day for each day of violation.

Please call me at (510) 567-6719 with any questions regarding this case.

Sincerely,

Robert W. Schultz, R.G.
Hazardous Materials Specialist

cc: Murray Stevens, 3356 Kincheloe Ct., Lafayette, CA 94549-2308
Stephen H. Schadlich, Attorney at Law, 1999 Harrison St., Ste. 2400, Oakland, CA 94612
Frank Hamedi-Fard, Enviro Soil Tech Consultants, 131 Tully Rd., San Jose, CA 95111
Donna Drogos, ACEH
Robert W. Schultz, ACEH

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 15, 2003

RO 260

Mr. Murray Stevens
Kamur Industries, Inc.
3356 Kincheloe Court
Lafayette, CA 94549-2308

Re: Plaza Carwash, 400 San Pablo Avenue, Albany – Request for Case Summary and Data Compilation

Dear Mr. Stevens:

This letter is sent in follow-up to the July 30, 2003 meeting held at the Alameda County Environmental Health Department. During this meeting, your consultant, Enviro Soil Tech Engineering (ESTE), was requested to submit via e-mail a brief presentation of expected tasks to be completed in order to advance this project towards eventual case closure, followed by a data package addressing the topics noted, below. To date, we have not received the expected communication from ESTE in that regard.

Please have your consultant provide a case summary that includes, in addition to a presentation of project milestones, a compilation of the following technical data:

1. Data tables presenting historic analytical results for all soil and groundwater samples. All target compounds, including halogenated solvents, are to be presented in this fashion. Sample results from *Priority Environmental Labs* deemed invalid are also to be presented, but must also be "flagged" to indicate the status of their validity.

2. Series of comprehensive maps showing locations of wells, borings, excavations, structures, sample locations, subsurface utilities (where known), streams, surface drains, topography, groundwater flow, etc.

3. Series of cross sections from at least two transects trending perpendicular to one another.

4. Revised boring logs reflecting Unified Soil Classification System (USCS) standards / symbols.

5. Rose diagrams depicting all historic groundwater gradients and flow directions.

The requested data summary must also present conclusions, based on professional interpretation and judgment, as well as recommendations for additional work where data gaps are identified.

This data summary package is due within 30 days of the date of this letter.

Please feel free to contact me at (510) 567-6783 should you have any questions.

Sincerely,

Scott O. Seery, RG, CHMM
Hazardous Materials Specialist

cc: Betty Graham, RWQCB
George W. Ososke Trust, 110 Crown Rd., Kentfield, CA 94904-2706
Steve Schadlich, Reed Smith Crosby Heafy LLC
1999 Harrison St., 25th Floor, Oakland, CA 94619
Frank Hamedi, Enviro Soil Tech Engineering, 131 Tully Rd., San Jose, CA 95111
Mansour Sepehr, SOMA Env. Engineering, Inc. 2680 Bishop Dr., San Ramon, CA 94583
D.Drogos

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

05-30-02

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

RO0000260

May 29, 2002

Mr. Frank Hamedi
Enviro Soil Tech
131 Tully Road
San Jose, CA 95111

RE: 400 San Pablo Avenue, Albany, CA

Dear Mr. Hamedi,

Today, I was present for the advancement of six boreholes at the above referenced site. Soil analytical results will be used in an amended human health and/or ecological risk assessment. Groundwater samples will help to delineate the extent of groundwater contamination west of the former tank/dispenser areas. For the soil and groundwater samples collected for laboratory analysis, be sure to run for TPHg, BTEX, and MTBE. Also, for the soil (3 foot sample) and groundwater samples collected from the furthest west borehole, analyze for ether oxygenates, ethanol, and lead scavengers (EDB and 1,2-DCA) using Method 8260.

A report documenting today's field work is due within 60 days of the date of this letter, or **by July 31, 2002.** A detailed site plan should be include in this report. The site plan should at a minimum include the former building structures, the new building structures, location of former USTs and dispensers, the location of the existing water UST, the extent of all excavations, and existing and abandoned groundwater monitoring wells.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Murray Stevens, 2351 Shoreline Drive, Alameda, CA 94501
George Ososki, 110 Crown Road, Kentfield, CA 94904

plazacar-10

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

12-12-01

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

RO0000260

December 11, 2001

Mr. Murray Stevens
Kamur Industries, Inc.
3356 Kincheloe Ct
Lafayette, CA 94549-2308

RE: Work Plan Implementation at 400 San Pablo Ave., Albany, CA

Dear Mr. Stevens:

This is just a note to remind you to implement Enviro Soil Tech Consultants' June 2001 *Revised Work Plan* and their August 2001 *Addendum to Revised Proposed Work Plan* that was prepared for the above referenced site. You had requested a postponement until business slows down to implement the work plan. Now that winter is here, and this should be your slow season, please conduct field activities before the end of winter.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Frank Hamedi, Enviro Soil Tech, 131 Tully Rd, San Jose, CA 95111
Mansour Sepehr, SOMA, 2680 Bishop Drive, Suite 203, San Ramon, CA 94583

plazacar-9

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

08-14-01

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

RO0000260

August 13, 2001

Mr. Murray Stevens
Kamur Industries, Inc
3356 Kincheloe Ct.
Lafayette, CA 94549-2308

RE: Workplan Approval for 400 San Pablo, Albany, CA

Dear Mr. Stevens:

I have completed review of Enviro Soil Tech Consultants' June 2001 *Revised Work Plan* and their August 2001 *Addendum to Revised Proposed Work Plan* prepared for the above referenced site. The proposal to advance up to six soil boring to collect soil samples from the vadose zone is acceptable. Data from this investigation will be incorporated into a risk assessment report. No groundwater samples will be collected from the soil borings.

Please provide at least 72 hours advance notice of field activities. I would like to be present to witness the collection of soil samples. If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Frank Hamedi, Enviro Soil Tech, 131 Tully Road, San Jose, CA 95111
Mansour Sepehr, SOMA, 2680 Bishop Drive, Suite 203, San Ramon, CA 94583

plazacar-8

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

07/03/01

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

RO0000260

July 2, 2001

Mr. Murray Stevens
Kamur Industries, Inc
3356 Kincheloe Ct.
Lafayette, CA 94549-2308

RE: Workplan for 400 San Pablo Ave, Albany, CA

Dear Mr. Stevens:

I have completed review of Enviro Soil Tech Consultants' June 2001 *Proposed Workplan* and *Revised Workplan* prepared for the above referenced site. The workplans proposed to advance six hollow stem auger boring to collect soil and groundwater samples at the site.

As you may recall, this office cannot recommend site closure until it has been demonstrated that residual hydrocarbons in soil do not pose a risk to human health. To date, there is insufficient soil data from the vadose zone to complete a risk assessment. This office requested a workplan for the collection of soil samples from the vadose zone.

It is acceptable to advance soil borings using direct push technology. This method is less intrusive and will leave fewer blemishes on the new concrete paving. The collection of grab groundwater samples is not necessary. It is advised to gauge the existing wells to determine depth to groundwater, so soil can be collected from the vadose zone. If this is acceptable to you, please have another revised workplan submitted for the advancement of soil borings using direct push technology.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Frank Hamedi, Enviro Soil Tech, 131 Tully Road, San Jose, CA 95111
Mansour Sepehr, SOMA, 2680 Bishop Drive, Suite 203, San Ramon, CA 94583

plazacar-6

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

12-5-00

P0260

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

StID 3605

December 4, 2000

Mr. Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Drive
Alameda, CA 94501

RE: Work Plan for 400 San Pablo Avenue, Albany, CA

Dear Mr. Stevens:

In September 19, 2000, I requested a work plan for the advancement of a minimum of six soil borings to collected soil samples from the vadose zone at the above referenced site. The work plan was due by November 22, 2000. To date, this office is not in receipt of the required report. Please provide the work plan as soon as possible.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Frank Hamedi, Enviro Soil Tech, 131 Tully Road, San Jose, CA 95111

plazacar-6

SCVT 9-25-00

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

R0260

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

StID 3605

September 19, 2000

Mr. Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Drive
Alameda, CA 94501

RE: Soil Sampling at 400 San Pablo, Albany, CA

Dear Mr. Stevens:

In our meeting today, we discussed the methods to evaluate the potential risk to human health due to residual hydrocarbons in the vadose zone. Most of the soil data collected to date were from below groundwater elevations. The few samples collected from the vadose zone were not sufficient to generate a representative concentration (95% UCL) for input into a risk assessment. It was agreed that additional soil samples would be collected in the vicinity of the former tank excavation and/or groundwater monitoring wells STMW-1 and STMW-2.

A work plan for the advancement of a minimum of six soil borings to collect soil samples from the vadose zone is due within 60 days of the date of this letter, or **by November 22, 2000.** Data collected from this phase of investigation will be used to prepare an addendum to the risk assessment previously submitted.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Frank Hamedi, Enviro Soil Tech, 131 Tully Road, San Jose, CA 95111
Mansour Sepehr, SOMA, 2680 Bishop Drive, Suite 203, San Ramon, CA 94583

plazacar-5

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

RO # 260

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

StID 3605

July 24, 1998

Mr. Murray Stevens
Kamur Industries, Inc
2351 Shoreline Drive
Alameda, CA 94501

RE: Addendum to Risk Assessment for 400 San Pable Ave, Albany, CA

Dear Mr. Stevens:

Ms. Madhulla Logan, from this office, has completed review of SOMA's August 1997 "Human Health Risk Assessment" prepared for the above referenced site. The risk assessment is incomplete. An amended risk assessment should be submitted for review, which includes the following changes and additions:

1. redo the indoor air inhalation pathway using RBCA methodology (without using degradation rates);
2. for site specific concentrations, use the average concentration from the last four quarters' groundwater data;
3. if site specific (measured) values are not available for porosity, fraction organic carbon content, etc, then use the RBCA default values;
4. give a rationale for not evaluating risk due to chlorinated solvents; and,
5. perform a qualitative and quantitative ecological risk assessment for potential impacts to the nearby creek.

In addition, there does not appear to be sufficient site data to verify if hydrocarbon contaminants identified in well MW-3 is from the fuel release at the car wash, or from the storm drain. Therefore, additional borings should be advanced west and southwest of the former tank location to collect grab groundwater samples. One boring should be advanced approximately 70' west of the former tank pit; one ~90' west of well STMW-1; and, one ~150' southwest of the former tank pit.

Lastly, creek water samples have not been collected since June 1996. Please collect creek samples along with groundwater monitoring well samples in August 1998. Water samples should be analyzed for TPHg and BTEX. Water samples collected near the dry cleaners should also be analyzed for chlorinated solvents.

The amended risk assessment and work plan for additional soil borings should be submitted to this office **by September 11, 1998.** Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: George Ososke
110 Crown Road
Kentfield, CA 94904

Mansour Sepehr
SOMA
2680 Bishop Drive, Suite 203
San Ramon, CA 94583

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

RO # 260

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

December 2, 1997

Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Drive
Alameda CA 94501

George & June Ososke Trust
110 Crown Road
Kentfield CA 94904

Janice Sadler
Norge Cleaners
398 San Pablo Av.
Albany CA 94706

RE: 398 and 400 San Pablo Av., Albany CA 94706 (our site #3605)

Dear Mssrs. Stevens and Ososke and Ms. Sadler:

I have reviewed the quarterly report for the August 1997 groundwater sampling event as well as the Human Health Risk Assessment. The quarterly report recommendation to perform one more groundwater sampling event prior to applying for case closure is acceptable to this Office. Sampling should take place before the end of this year.

I have recently assumed case review responsibility from Juliet Shin. You may contact me at (510)567-6770 with any questions.

Sincerely,

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Dick Pantages, Environmental Health Services

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

RO#260

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

March 14, 1997

Mr. Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Drive
Alameda, CA 94501

George & June Ososki Trust
110 Crown Road
Kentfield, CA 94904

Janice Sadler
Norge Cleaners
398 San Pablo Avenue
Albany, CA 94706

STID 3605

Re: 398 and 400 San Pablo Avenue, Albany, California

Dear Ms. Sadler and Messrs. Stevens and Ososki,

This office has reviewed Soil Tech Engineering, Inc.'s (Soil Tech) Subsurface Investigation report, dated November 15, 1996, for the above site. Elevated contaminant concentrations, with a sheen and odor, were identified at the storm drain outlet into the adjacent El Cerrito Creek, however, no contaminants were identified in water samples collected immediately upgradient of this location along the storm drain. This indicates that there is a localized source for this contamination. Based on the fact that Well MW-3, located only 30 feet from the storm drain pipe, is identifying the same contaminants as the outlet at consistently very elevated concentrations, it is very likely that the concentrations identified at the outlet are resulting from the site. One possibility is that the contaminant plume identified in Well MW-3 is migrating along the backfilled material surrounding the storm drain pipes and into the creek.

Concentrations of benzene in Well MW-3 have consistently exceeded the protective threshold value for aquatic organisms of 71 parts per billion (ppb) given in the Environmental Protection Agency's National Toxics Rule, which indicates that the concentrations identified in the site's groundwater contaminant plume may be an ongoing threat to the creek. Based on the threat of the groundwater contaminant plume to El Cerrito Creek, this office is requesting that you prepare cross sections to help determine what type of hydraulic connection there may be between the plume and the creek. The cross sections would include the wells, the creek, and the storm drain pipe and outlet. In preparing the cross sections, elevation measurements should also be collected for the creek dimensions, as well as details on the depth and elevations of the storm

drain trench, which may be available from the City. If the cross sections support any hydraulic connection between the groundwater and the creek, then additional measures will need to be taken to either regularly inspect and sample the creek area or to contain future impacts to the creek from the site's groundwater. One option for containment may be passive bioremediation with the installation of oxygen-releasing compounds to supplement and expedite microbial degradation of the plume. If containment measures are not taken, then an ecological risk assessment would need to be conducted to determine whether the actual risk to the aquatic organisms from the groundwater plume could be acceptable.

Quarterly groundwater monitoring is required to continue at the site. Groundwater samples collected from all seven on-site monitoring wells shall be analyzed for Total Petroleum Hydrocarbons as gasoline (TPHg) and benzene, toluene, ethylbenzene, and total xylenes (BTEX). Additionally, groundwater samples collected from Well MW-3 should continue to be analyzed for chlorinated hydrocarbons (Method 8010). Based on the Non Detect levels of Methyl-Tert Butyl Ether (MTBE) in this last sampling round, no further analysis for MTBE will be required. The next quarterly sampling event should have taken place in February 1997, and a report documenting this sampling event is due to this office in April 1997. Future quarterly groundwater monitoring reports should include the field notes documenting sample characteristics such as turbidity and odor, pH, temperature, conductivity, gallons bailed, etc. Also, future reports should include a site map showing detailed elevation contours (please refer to the attached copy of the County's elevation contours as an example). As you can see from the attached figure, preparing elevation contours can give you a much more accurate gradient determination.

The requested cross section information should be submitted with the next quarterly groundwater monitoring report submitted in April 1997. If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin
Senior Hazardous Materials Specialist

ATTACHMENT

cc: Frank Hamedi-Fard, Soil Tech Engineering, Inc., 1761 Junction Ave., San Jose, CA 95112

Acting Chief

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

RO#260

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

November 4, 1996

Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Drive
Alameda, CA 94501

George & June Ososki Trust
110 Crown Road
Kentfield, CA 94904

Janice Sadler
Norge Cleaners
398 San Pablo Avenue
Albany, CA 94706

STID 3605

Re: 398 and 400 San Pablo Avenue, Albany, California

Dear Ms. Sadler and Messrs. Stevens and Ososki,

On November 4, 1996, I was out at the site to oversee the scheduled drilling of three proposed monitoring wells adjacent to El Cerrito Creek. During that time, sheen was noted in the creek in and around the storm drain outfall. Due to the fact that elevated contaminant levels have consistently been identified in the site's well MW-3, which is located adjacent to the storm drain pathway, it appears very likely that the groundwater contaminant plume observed in Well MW-3 could be migrating along the trench backfill of the storm drain into the creek. In response to my reconnaissance of the area, there appeared to be less sheen in the storm drain upgradient of the site than downgradient of the site, indicating that the site is contributing to the observed sheen.

Per my conversation with Frank Hamedi, Soil Tech Engineering, on November 4, 1996, this office is requesting that the sheen observed in the creek be characterized and compared with the levels identified in a manhole/drainage area upgradient of the site. If the contaminant concentrations are higher in the downgradient location, it would suggest that the site's plume is contributing to the sheen in the creek. Since elevated levels of chlorinated hydrocarbons have been identified from Well MW-3 in the past, this office is requesting that the "grab" water samples collected from the creek and storm drain be analyzed for chlorinated hydrocarbons, in addition to TPHg and BTEX.

The well installation on November 4, 1996 was delayed due to access agreement issues. You are required to notify this office of when the drilling will resume, so that a County representative may be present for oversight purposes. Additionally, please be reminded that the water sample collected from the new monitoring well located downgradient of MW-3 needs to be analyzed for chlorinated hydrocarbons, in addition to TPHg and BTEX.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin
Senior Hazardous Materials Specialist

cc: Frank Hamedi
Soil Tech Engineering
1761 Junction Ave.
San Jose, CA 95112

Acting Chief

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

R0260

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

July 17, 1996

Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Drive
Alameda, CA 94501

George & June Ososki Trust
110 Crown Road
Kentfield, CA 94904

Janice Sadler
Norge Cleaners
398 San Pablo Ave.
Albany, CA 94706

STID 3605

Re: Scheduled work at 398 and 400 San Pablo Avenue, Albany, California

Dear Ms. Sadler and Messrs. Stevens and Ososki,

This office has reviewed over the Schedule of Work, dated July 16, 1996, for the installation of additional downgradient monitoring wells; the preparation of a human health, and possibly ecological, risk assessment; and the possible submittal of a modified remediation system, if warranted. Based on this Schedule of Work, **the proposed monitoring wells will be installed and sampled in August 1996, and a report summarizing this work will be submitted to this office in September 1996.** This Schedule of Work is acceptable to this office. Please notify this office at least one week in advance of planned activities at the site.

Additionally, this office feels that the chlorinated hydrocarbons observed in Well MW-3 is very likely resulting from the dry cleaning operations at the site, as opposed to the former operation of the petroleum underground storage tanks (USTs). Therefore, if the chlorinated hydrocarbon concentrations increase or persist within the next two quarterly groundwater monitoring events, this office will separate the underground storage tank (UST) issues from the dry cleaner issues, and will transfer the chlorinated hydrocarbon issues to another program for non-UST sites.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin
Senior Hazardous Materials Specialist

cc: Frank Hamedi
Soil Tech Engineering
1761 Junction Ave.
San Jose, CA 95112

Cheryl Gordon
SWRCB
Division of Clean Water Programs
Underground Storage Tank Cleanup Fund
P.O. Box 944212
Sacramento, CA 94244-2120

Acting Chief-File

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

RO#260

RAFAT A. SHAHID, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

March 29, 1996

Ms. Janice Sadler
Norge Cleaners
398 San Pablo Ave.
Albany, CA 94706

STID 3605

Re: Investigations at 398 and 400 San Pablo Ave., Albany, California

Dear Ms. Sadler,

Soil and groundwater investigations have been on-going at 400 San Pablo Avenue since 1989, when free product was noted to be migrating from beneath the car wash site into the adjacent El Cerrito Creek. The petroleum-related contamination resulting from 400 San Pablo Avenue is currently being addressed by Murray Stevens, the operator for the car wash. However, this office believes that there may be or have been some release of contaminants from the Norge Cleaners facility to soil and groundwater. In 1989, as part of the petroleum-related investigations, one groundwater sample was collected from a well downgradient of the Norge Cleaners, Well MW-3, and analyzed for solvents commonly related to dry cleaning operations. Analysis results of this water sample identified elevated levels of solvents, such as 2,800 parts per billion (ppb) 1,2-dichloroethene, 3,400 ppb trichloroethylene, and 2,700 ppb tetrachloroethylene.

Based on the above information, this office is requesting that you work with Mr. Stevens and the property owner, the Ososki Trust, to include the analysis for these solvents (analysis using EPA Method 8010 or 8240) in the groundwater samples collected from three of the existing monitoring wells at the site (Wells STMW-1, MW-2, and MW-3). If the analysis results continue to indicate a potential contaminant release from Norge Cleaners, continued analysis for these constituents may be required for the three wells and from the purged groundwater resulting from the anticipated interim remediation system for the car wash site.

If you have any questions or comments, please feel free to contact me at (510) 567-6763.

Sincerely,

Juliet Shin
Senior Hazardous Materials Specialist

cc: Ms. George & June Ososki Trust
110 Crown Road
Kentfield, CA 94904

Mr. Murray T. Stevens
Kamur Industries
2351 Shoreline Drive
Alameda, CA 94501

Acting Chief-File

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

RO# 260

RAFAT A. SHAHID, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

March 29, 1996

Mr. George & June Ososki Trust
110 Crown Rd.
Kentfield, CA 94904

STID 3605

Re: Investigations at 398 and 400 San Pablo Ave., Albany, California

To Whom It May Concern,

As you are probably aware, soil and groundwater investigations have been on-going at 400 San Pablo Avenue since 1989, when free product was noted to be migrating from beneath the car wash site into the adjacent El Cerrito Creek. It is our understanding that you are the property owner for this site and the adjacent Norge Dry Cleaners site, located at 398 San Pablo Avenue. The petroleum-related contamination resulting from 400 San Pablo Avenue is currently being addressed by Murray Stevens, the operator for the car wash. However, this office believes that there may be or have been some release of contaminants from the Norge Dry Cleaners facility to soil and groundwater. In 1989, as part of the petroleum-related investigations, one groundwater sample was collected from a well downgradient of the Norge Dry Cleaners, Well MW-3, and analyzed for solvents commonly related to dry cleaning operations. Analysis results of this water sample identified elevated levels of solvents, such as 2,800 parts per billion (ppb) 1,2-dichloroethene, 3,400 ppb trichloroethylene, and 2,700 ppb tetrachloroethylene.

Based on the above information, this office is requesting that you work with Mr. Stevens and Norge Cleaners to include the analysis for these solvents (analysis using EPA Method 8010 or 8240) in the groundwater samples collected from three of the existing monitoring wells at the site (Wells STMW-1, MW-2, and MW-3). If the analysis results continue to indicate a contaminant release from Norge Cleaners, continued analysis for these constituents may be required for the three wells and from the purged groundwater resulting from the anticipated interim remediation system for the car wash site.

If you have any questions or comments, please feel free to contact me at (510) 567-6763.

Sincerely,

Juliet Shin
Senior Hazardous Materials Specialist

RO # 260

cc: Janice Sadler
Norge Cleaners
398 San Pablo Ave.
Albany, CA 94706

Mr. Murray T. Stevens
Kamur Industries
2351 Shoreline Drive
Alameda, CA 94501

Acting Chief-File

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

RO#260
RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

CERTIFIED MAILER # P 368 729 302

February 22, 1996

Mr. Murray T. Stevens
Kamur Industries
2351 Shoreline Drive
Alameda, CA 94501

STID 3605

Re: Required work at 400 San Pablo Ave., Albany, California

Dear Mr. Stevens,

Based on the sampling results of the last groundwater sampling event on November 30, 1995, very elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg) and benzene, toluene, ethylbenzene, and xylenes (BTEX) continue to be identified from on-site monitoring wells located immediately adjacent to El Cerrito Creek, and near the storm drain which leads directly to the creek. Benzene, which is a known carcinogen, is currently being identified at concentrations of 1,300 parts per billion (ppb) in groundwater samples collected from on site. This concentration greatly exceeds the human health protective levels given in Tier 1 of the American Society for Testing and Material's Risk-Based Corrective Action (ASTM RBCA) guidelines by three-fold for a residential scenario and two-fold for a commercial/industrial scenario. Your site is currently located in a residential/light commercial area.

A work plan proposing containment measures was submitted to and approved by this office in May 1993, however, this work has not been implemented to date. Per my conversations with you throughout 1993 and 1994, you stated that the work could not be implemented due to remodeling on your site. Per my most recent conversations with you, the last one having taken place on December 20, 1995, you stated that you had been working on and had finally obtained the three necessary bids for the proposed work and would have them reviewed by the State Trust Fund. The State Trust Fund typically has a one week turn-around rate for review of work plans. To date, this office has received no further communication from you regarding any response from the State Trust Fund or the implementation of this work. Your site has been impacting the creek since at least July 1989, when product from your site was noted to be infiltrating the creek. Based on one of the last creek sampling results conducted in 1991; 31,000ppb TPHg was identified in the creek adjacent to the storm drain which appears to be draining the contaminant plume from your site, and Non Detect levels were identified approximately 20-feet upgradient of this storm drain.

Based on the current potential for impact to human health and surface waters at your site, this office is requiring you to do the following:

- You are required to immediately begin measures to contain the contaminated groundwater from further impacting the adjacent El Cerrito Creek. **This work shall begin within 30 days of the date of this letter.**

- Although elevated levels of chlorinated hydrocarbons were identified in Well MW-3 in 1989 (2,800ppb 1,2-dichloroethene, 3,400ppb trichloroethylene, and 2,700ppb tetrachloroethylene), apparently resulting from the Norge Dry Cleaners on your property, no additional creek or groundwater samples were analyzed for these constituents. You are required to incorporate analysis for chlorinated hydrocarbons using Method 8010 in all future quarterly sampling events.

- Quarterly sampling of surface water from El Cerrito Creek shall be reinstated. Samples shall be collected from the same four sampling locations that were designated in the past. Additional sampling events will also be required immediately after significant rain storm events (greater than or equal to 0.25 inches, as previously designated by the Regional Water Quality Control Board). These samples shall be analyzed for TPHg, BTEX, and chlorinated hydrocarbons.

- If containment measures are not immediately employed to prevent further impact to surface waters, or if contaminant concentrations do not significantly decrease with the employment of the proposed containment measures, you will be required to assess the impact the contamination is having on aquatic organisms through the employment of an environmental risk assessment.

- Per the County's letters to you on January 5, 1995 and April 4, 1995, and subsequent conversations with you, you are required to replace the previously destroyed upgradient well, Well OTMW-5, with a new well in a nearby location. The last groundwater sampling results from this well identified 570ppb TPHg and 72ppb benzene, which exceeds ASTM RBCA's human health protective levels, and is 72 times the drinking water standards for benzene. **This well shall be replaced within 45 days of the date of this letter, and incorporated into the required quarterly groundwater sampling events.**

- The next quarterly groundwater monitoring report is due to this office in March 1996.

Based on the information provided to date, there appears to be a great threat to human health and the environment from the contaminant releases at your site which needs to be addressed immediately. There appears to be no obstacles to addressing these concerns, due to the Letter of Commitment issued to you by the State Water Resources Control Board in June 1993. Additionally, noncompliance with the investigation/cleanup requirements can jeopardize your eligibility for reimbursement by the State.

Please comply with the above concerns. If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin
Senior Hazardous Materials Specialist

cc: Cheryl Gordon
SWRCB
Division of Clean Water Programs
Underground Storage Tank Cleanup Fund
P.O. Box 944212
Sacramento, CA 94244-2120

Gil Jensen-Alameda County District Attorney's Office

Bill Ekern
City of Albany
Community Development and Environmental Resources
1000 San Pablo Ave.
Albany, CA 94706

Acting Chief-File

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

RAFAT A. SHAHID, Assistant Agency Director

R0260

ALAMEDA COUNTY CC 430-4510
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIVISION
1131 HARBOR BAY PKWY., RM.250
ALAMEDA, CAL. 94502-6577

April 4, 1995

Mr. Murray T. Stevens
Kamur Industries
2351 Shoreline Drive
Alameda, CA 94501

STID 3605

Re: 400 San Pablo Ave., Albany, California

Dear Mr. Stevens,

On January 5, 1995, this office sent you a letter requiring you to implement the May 1993 Interim Remediation work plan or implement some containment and delineation measures at the site by February 16, 1995. This office received a response letter from you, dated January 21, 1995, requesting another extension for the implementation of work at the site to May 1995.

Approximately two years has passed since the May 1993 Interim Remediation work plan was submitted, and over four years since contamination was identified at the site. Floating product and/or very elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg) and benzene, toluene, ethylbenzene, and xylenes (BTEX) have consistently been identified in all of the four on-site monitoring wells. Any further extensions for the proposed work will be seriously questioned.

It is the understanding of this office that **plume containment and delineation work will begin promptly at the site in the first week of May 1995**. As stated in the County's January 5, 1995 letter, the anticipated work shall include delineation of the plume towards the south, to replace Well OTMW-5, in addition to fully containing and delineating the plume to the north towards the creek.

Please submit a timetable for all anticipated work to this office within the next week.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin
Senior Hazardous Materials Specialist

cc: Mr. Frank Hamedi-Fard
Soil Tech Engineering
298 Brokaw Road
Santa Clara, CA 95050

Gil Jensen, Alameda County District Attorney's Office

Cheryl Gordon
State Water Resources Control Board
Division of Clean Water Programs
Underground Storage Tank Cleanup Fund
Program
P.O. Box 944212
Sacramento, CA 94244-2120

File

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

RAFAT A. SHAHID, Assistant Agency Director

RO 260

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

January 5, 1995

Mr. Murray T. Stevens
Kamur Industries
2351 Shoreline Drive
Alameda, CA 94501

STID 3605

Re: 400 San Pablo Ave., Albany, California

Dear Mr. Stevens,

This office has reviewed over Soil Tech Engineering's (Soil Tech) second, third, and fourth quarter monitoring reports, dated April 18, 1994, August 5, 1994, and November 14, 1994, for the above site. According to the third and fourth quarter reports, it appears that Well OTMW-5 has been demolished and was not sampled for the last two quarters. However, elevated levels of Total Petroleum Hydrocarbons and benzene were observed in ground water samples collected from this well for the two quarters immediately preceding its destruction.

Based on the concentrations identified in former Well OTMW-5, and the fact that the ground water gradient has been observed to flow southerly, from the site towards Well OTMW-5, it appears that the site's contaminant plume extends to and possibly beyond former Well OTMW-5. Therefore, you will be required to install a well to replace former Well OTMW-5 in order to monitor the extent of the contaminant plume in this direction. A work plan shall be submitted **within 45 days** of the date of this letter addressing this work.

Lastly, very elevated levels of contaminant constituents continue to be identified in all the site's monitoring wells. As stated in the County's December 14, 1994 letter, the May 1993 Interim Remediation work plan shall be implemented **by January 25, 1995.** Any requests for extensions of or modifications to the required tasks shall be submitted in writing to this office for approval.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin
Senior Hazardous Materials Specialist

cc: Mr. Frank Hamedi-Fard
Soil Tech Engineering
298 Brokaw Road
Santa Clara, CA 95050

Cheryl Gordon
State Water Resources Control Board
Division of Clean Water Programs
Underground Storage Tank Cleanup Fund Program
P.O. Box 944212
Sacramento, CA 94244-2120

Edgar Howell

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

RAFAT A. SHAHID, Assistant Agency Director

R0260

December 14, 1994

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

Mr. Murray T. Stevens
Kamur Industries
2351 Shoreline Dr.
Alameda, CA 94501

STID 3605

RE: 400 San Pablo Ave., Albany, California

Dear Mr. Stevens,

Elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg) and benzene, toluene, ethylbenzene, and xylenes (BTEX), including free product, have been identified at the above site. Following the implementation of a number of quarterly ground water monitoring events, a work plan of interim ground water remediation was submitted in May 1993. After reviewing this work plan, this office sent you a letter on July 8, 1993 approving this work plan. Per my conversation with your consultant, Mr. Frank Hamedi-Fard, on November 28, 1994, this work plan has not yet been implemented. According to Mr. Hamedi, the implementation of the work plan was delayed due to remodeling work at the site. However, it is the understanding of this office that remodeling at the site has been completed to the extent that the work plan can now be implemented. It is also the understanding of this office that the NPDES permit for the work plan has been ascertained. Therefore, you are required to implement the May 1993 work plan **within 45 days** of the date of this letter. You will be required to submit a report documenting the work within 45 days after completing field activities.

Additionally, per Article 5 Title 23 California Code of Regulations, you are required to conduct quarterly ground water monitoring at the site and submit the corresponding quarterly reports to this office. The last quarterly ground water monitoring report submitted to this office was dated November 2, 1993, and documented the October 11, 1993 sampling results. Although this office has not received any quarterly report since November 1993, Mr. Hamedi stated that Soil Tech Engineering has been regularly generating quarterly ground water monitoring reports to date. Please submit copies of all quarterly reports generated since November 1993 to this office **within 30 days** of the date of this letter.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin
Senior Hazardous Materials Specialist

cc: Mr. Frank Hamedi-Fard
Soil Tech Engineering
298 Brokaw Road
Santa Clara, CA 95050

Cheryl Gordon
State Water Resources Control Board
Division of Clean Water Programs
Underground Storage Tank Cleanup Fund
Program
P.O. Box 944212
Sacramento, CA 94244-2120

Edgar Howell

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

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

R0260

July 8, 1993

Mr. Murray T. Stevens
Kamur Industries
2351 Shoreline Dr.
Alameda, CA 94501

STID 3605

RE: 400 San Pablo Ave., Albany, California

Dear Mr. Stevens,

This office received the addendum to the May 19, 1993 work plan on June 17, 1993. Everything in the addendum is acceptable to this office except for the schedule of work on page 13. The schedule in the addendum has put aside 10 weeks for the approval of the NPDES permit by the Regional Water Quality Control Board (RWQCB). However, RWQCB stated that, at most, the approval of the NPDES permit should take a maximum of 6 to 8 weeks. Therefore, the schedule should assume that the NPDES permit will be obtained by the 18th week, and not the 20th week. Additionally, the schedule still states that the system will begin operations in the 34th week. This office does not understand why it will take 14 weeks from the day the NPDES permit is granted to begin system operations. Therefore, this office is requiring that the system begin operations immediately after obtaining the permit.

If you have any questions or comments please contact me at (510) 271-4530.

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Frank Hamedi-Fard
Soil Tech Engineering, Inc.
298 Brokaw Rd.
Santa Clara, CA 95050

Edgar Howell-File (JS)

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

R0260

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

May 27, 1993

Mr. Murray T. Stevens
Kamur Industries
2351 Shoreline Dr.
Alameda, CA 94501

STID 3605
Re: 400 San Pablo Avenue, Albany, California

Dear Mr. Stevens,

I have reviewed Soil Tech Engineering's (Soil Tech) Interim Remediation Plan, that this office received on May 19, 1993. Per a conversation with Mr. Frank Hamedi, Soil Tech, on May 27, 1993, I informed him that, according to the Regional Water Quality Control Board, the approval of the NPDES permit for discharge into the storm drain should only take six to eight weeks at most. Therefore, this office requested that he submit a revised, more detailed and realistic, timetable for scheduled work events. Additionally, this office requested an addendum to the work plan addressing the monitoring of the catch basin, plans for pumping the catch basin if contaminants are detected, and the placement of the easternmost proposed monitoring well closer to San Pablo Avenue to address any migration of contaminants downgradient from STMW-2.

These revisions/amendments to the work plan are due **within 10 days** of the date of this letter. If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Frank Hamedi-Fard
Soil Tech Engineering, Inc.
298 Brokaw Road
Santa Clara, CA 95050

Ken Freidman
Albany Bowl Properties
529 Brookline
Mill Valley, CA 94941

Edgar Howell-File(JS)

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

R0260

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

January 22, 1993

Murray T. Stevens
Kamur Industries Inc.
2351 Shoreline Dr.
Alameda, CA

STID 3605

RE: 400 San Pablo Avenue, Albany, California

Dear Mr. Stevens,

Per our meeting on January 21, 1993, you will be required to submit a detailed work plan for the installation and operation of an extraction system to contain and remediate the ground water contamination resulting from the site. This office is requiring that, first and foremost, an extraction system be placed **on the site**, in order to draw contaminants back towards the source, instead of drawing contaminants towards the creek and away from the site, as was proposed in February 1992. Furthermore, an on-site extraction system was also required in the December 1991 meeting between the Regional Water Quality Control Board and Plaza Car Wash, for the very same reasons as stated above.

According to boring logs from the neighboring Albany Bowl property, soil types in the vicinity of the site consist of clay down to approximately 14 feet below ground surface and sand from approximately 14 feet to at least 20 feet below ground surface. Although Mr. Hamedi, Soil Tech Engineering, stated that former pumping from near the tank pit did not have a capture zone that encompassed Well OTMW-5, this office has information suggesting that the inadequate capture zone was due to the fact that pumping occurred in the clay layer instead of in the sand layer.

From the information available to this office, it appears that you can successfully install and operate an extraction system on the site that will adequately capture the ground water contamination beneath the site and immediately off site. An additional extraction system may be needed to address the high concentration contaminant plume that has already migrated off site, in the vicinity of Wells MW-3 and MW-2. Additionally, since it appears that the ground water and soil in the sand layer has already been impacted by releases at your site, according to the contaminants identified in samples collected from Well OTMW-5, this office **is requiring** that you address the extraction and remediation of contaminants in this zone of the aquifer.

Although, Mr. Hamedi stated that there were signs of artesian conditions at the site, it appears that an extraction system can still be successfully installed and operated at the site. Additionally, this office is doubtful as to whether a confining layer actually exists at the site. According to Mr. William Motzer, consultant to Albany Bowl, caliche levels were observed at various depths in the clay layer next door at the Albany Bowl site during trenching activities, indicating historical fluctuating water tables within the clay layer. Therefore, the clay layer would not appear to be confining.

Per a meeting with representatives of Albany Bowl on January 22, 1993, Albany Bowl recognizes the need to make Well OTMW-5 (i.e., Well MW-3) accessible to you for monitoring. This well serves as the upgradient delineating well for your site, and at this time, you are required to continue monitoring of this well. This office is requiring that you negotiate an access agreement for the well with Albany Bowl. Albany Bowl is willing to negotiate an agreement on the condition that you agressively pursue containment and remediation of the ground water contamination resulting from your site. It is still undecided whether this office will require additional monitoring of OTMW-6. At this time, monitoring of this well will not be required.

The work plan for the above required ground water extraction system is to be submitted to this office **by April 30, 1993.** It is the understanding of this office that, in the meantime, you will apply for all necessary permits for the extraction system, except for the discharge permit which, as you stated in the meeting, can only be obtained subsequent to the initial pump tests on the system. **You shall submit a time-table for all scheduled work events with the work plan.**

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Frank Hamedi-Fard
Soil Tech Engineering, Inc.
298 Brokaw Road
Santa Clara, CA 95050

Ken Freidman
Albany Bowl Properties
529 Brookline
Mill Valley, CA 94941

Edgar Howell-File(JS)

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

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

R0260

December 4, 1992

Murray T. Stevens
Kamur Industries Inc.
2351 Shoreline Dr.
Alameda, CA

STID 3605

RE: Containment of ground water contamination at 400 San Pablo Avenue, Albany, California

Dear Mr. Stevens,

The case file for the above site has recently been transferred to another Hazardous Materials Specialist, Juliet Shin.

This office has reviewed your letter, dated October 8, 1992, regarding the sample results for the ground water samples collected from the extraction of the sump. The analysis results did not detect any hydrocarbon contamination in these samples, however, rather than assuming that the contaminant concentrations have suddenly vanished, it is more credible to assume that the pumping of the sump did not effectively draw in the surrounding contamination. Well MW-3, located only 30 feet upgradient of the sump area has consistently detected free floating product, a sheen, or **very** elevated concentrations of Total Petroleum Hydrocarbons as gasoline (TPHg), as high as 510,000 ppb, and benzene, toluene, xylenes, and ethyl benzene (BTEX). Additionally, samples collected from the storm drain outlet, located adjacent to the sump area, have consistently identified very elevated concentrations of TPHg.

Considering the fact that Well MW-3 is located at the downgradient boundary of the site, and in reviewing the results of all ground water and surface water samples collected since 1989, this office is fairly certain that contaminated ground water resulting from your site has been migrating off the site. The ground water has continually been measured to be flowing towards the creek. To this date, very little has been done to effectively contain further migration of contaminated ground water from going offsite and/or into the creek. The elevated contaminant concentrations in the wells warrant immediate attention. You are required to begin the necessary work to contain the further migration of the ground water contaminant plume, as an interim remediation measure, and eventually address the remediation of the ground water, including the floating product observed in the former location of Well MW-4, and soil contamination at your site. The work must begin **within 45 days** of the date of this letter.

If the ground water extraction system, proposed in the February 13, 1992 report, is found to be ineffective in containing the contaminant plume, you must submit a new proposal to achieve this objective. Quarterly ground water monitoring and sampling of the creek should continue in concurrence with the operation of the ground water extraction system to assure this office that the extraction system is working effectively.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Rich Hiett, RWQCB

Frank Hamedi-Fard
Soil Tech Engineering, Inc.
298 Brokaw Road
Santa Clara, CA 95050

Gil Jensen, Alameda County District Attorney's Office

Edgar Howell-File(JS)

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

RAFAT A. SHAHID, Assistant Agency Director

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

P0260

April 21, 1992

Mr. Murray Stevens
2351 Shoreline Drive
Alameda, CA 94501

RE: Plaza Car Wash, 400 San Pablo Ave., Albany, CA

Dear Mr. Stevens:

I have reviewed your Interim Remedial Measure Plan dated February 13, 1992 that was prepared by Soil Tech Engineering. The concept of the plan is approved, and you can procede as proposed. After a quarter, the data and results must be analyzed to determine whether modifications to the system are needed.

Groundwater that is pumped out must be disposed of in accordance to regulatory requirements.

If you have any questions, please contact me at 271-4320.

Sincerely,

Larry Seto
Sr Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney's Office
Consumer and Environmental Protection
Rich Hiett, RWQCB
Howard Hatayama, DTSC
Frank Hamedi-Fard, Soil Tech Engineering
Bill Motzer, Aqua Terra
Ken Friedman, Albany Bowl
Rafat Shahid, Assistant Agency Director, Environmental Health

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

R0240

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

December 3,1991

Mr. Murry Stevens
Kamur Industries Inc.
2351 Shoreline Drive
Alameda, CA 94501

RE: Plaza Car Wash, 400 San Pablo Ave., Albany, CA

Dear Mr. Stevens:

This letter is to confirm a meeting scheduled for Thursday, December 12,1991 at 1:30 PM at the office of the Regional Water Quality Control Board at 2101 Webster Street, Suite 400, Oakland,CA. If you are unable to attend, please contact me.

If you have any questions, please call me at 271-4320.

Sincerely,

Larry Seto
Sr. Hazardous Materials Specialist

cc: Bill Motzer, Aqua Terra
Ken Freidman, Albany Bowl Properites
Eddie So, RWQCB
Rich Hiett, RWQCB
Hossain Kazemi, RWQCB
Files

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

Rolco

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

November 20,1991

Mr. Murry Stevens
Shoreline Drive
Alameda, CA 94501

RE: Plaza Car Wash, 400 San Pablo Ave., Albany, CA

Dear Mr. Stevens:

This letter is to confirm a meeting scheduled for Thursday, December 12,1991 at 1:30 PM at the office of the Regional Water Quality Control Board at 2101 Webster Street, Suite 400, Oakland,CA. If you are unable to attend, please contact me.

If you have any questions, please call me at 271-4320.

Sincerely,

Larry Seto
Sr. Hazardous Materials Specialist

cc: Bill Motzer, Aqua Terra
Ken Freidman, Albany Bowl Properites
Eddie So, RWQCB
Rich Hiett, RWQCB
Hossain Kazemi, RWQCB
Files

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

R0260

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

June 5,1991

Mr. Murray Stevens
Kamur Industries, Ins.
2351 Shoreline Drive
Alameda, CA 94501

RE: Plaza Car Wash, 400 San Pablo Avenue, Albany, CA

Dear Mr. Stevens:

I would like to take this time to introduce myself as the new Specialist that will be overseeing the investigation and remediation at the above site. I have reviewed your "Underground Tank Soil Sampling and Excavation Report " dated January 15, 1991 that was prepard by Soil Tech Engineering, Inc. High levels of soil contamination still exists on the property. **Futher investigation to define the vertical and lateral extent of contamination is required.**

Please submit to this office within thirty (30) days of the receipt of this letter your Plan of Correction. Your plan must include, but shall not be limited to:

1. Method(s) that will be used to define the lateral and vertical extent of contamination
2. Timetable for your next phase of investigation
3. Well logs of the two additional monitoring wells were installed to replace MW1 and MW4 that were destroyed during the over excavation
4. Quarterly monitoring results
5. Proposed method(s) to remediate groundwater

If you have any questions, please contact me at 271-4320.

Sincerely,

Larry Seto
Senior Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney's Office
Charlene Williams, DHS
RWQCB
Albany Fire
Rafat

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

R0260

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

Certified Mailer # P 062 127 758

January 29, 1991

Mr. Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Dr.
Alameda, CA 94501

SECOND NOTICE OF VIOLATION

Dear Mr. Stevens:

We have reviewed the Soil Tech Engineering report on the recent tank removal, soil excavation, and stream sampling at the Plaza Car Wash, 400 San Pablo Ave., in Albany. This report indicates that about 600 yards of soil were removed, but that contaminated soil (up to 1,300 ppm) was left in place during pit backfilling. In addition, soil removal necessitated the destruction of monitoring wells MW-1 and MW-4.

At this site, groundwater monitoring has been ignored, despite letters from this office in July and September 1990 that emphasized the need for quarterly monitoring of all on-site wells. According to file records, no samples or measurements have been taken from any well since May 1990. Although Soil Tech Engineering removed clearly contaminated groundwater from the pit during and immediately after tank removal, such action does not in itself resolve the groundwater problem. Thus, you are in violation of the California Water Code, as well as Sec. 25299.37, Health and Safety Code, since we requested technical information and quarterly sampling in a July 18, 1990 letter, and neither has occurred.

The July 18 letter also requested plans for: 1) installation of additional monitoring wells, to enable full definition of the hydrocarbon plume, including a schedule for work; and 2) removal of free product from any monitoring wells and from the sump, including a schedule for such work. As of the date of this letter, we have not received this material.

It appears that the soil remediation phase is complete. However, because high levels of soil contamination remain in place, and due to the proximity of the creek, groundwater characterization/remediation is of critical importance. Therefore, we are requiring you to perform the following general tasks at the site.

1. Install two additional monitoring wells on-site (not including the observation holes already in the former tank pit), one immediately downgradient of the former pit, and the other in the vicinity of the two wells that were destroyed.

2. Incorporate an upgradient monitoring well as part of the monitoring network for the site, to check for possible off-site migration, or install an additional upgradient well.

3. Sample and take measurements of groundwater from all wells in the monitoring network immediately, and ON A QUARTERLY BASIS thereafter.

4. Remove free product from any wells immediately after discovery, until such product no longer recharges into the well(s).

Groundwater remediation may be required at this site, depending on the results of groundwater sampling.

With regard to the soil stockpile, please submit specifics of the aeration plan, as well as a detailed description of the sampling protocol to be used to verify that soil hydrocarbon levels have been reduced to below 100 ppm. A copy of the BAAQMD aeration permit must accompany these materials.

You are directed to submit a work plan that addresses all the points in this letter to this office and to the RWQCB, no later than **February 28, 1991.** This letter constitutes a formal request for technical reports according to Sec. 13267 of the Water Code, as well as Sec. 25299.36 of the Health and Safety Code. Failure to respond in a timely manner could result in civil liabilities under the Water Code of up to $1,000 per day. In addition, should you not comply, Sec. 25299.37 of the Health and Safety Code authorizes this office or the RWQCB to contract for corrective action and recover costs in a specified manner.

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

Sincerely,

Gilbert M. Wistar

Gil Wistar
Hazardous Materials Specialist

cc: Lester Feldman, RWQCB
Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection Division
Rafat A. Shahid, Asst. Agency Director, Environmental Health
files

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

R0260

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

September 26, 1990

Mr. Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Dr.
Alameda, CA 94501

RE: **Work plan submitted for Plaza Car Wash, 400 San Pablo Ave., Albany**

Dear Mr. Stevens:

The Alameda County Department of Environmental Health, Hazardous Materials Division has reviewed the work plan submitted by Soil Tech Engineering for remedial work at the above site. This plan generally corresponds to the discussion held at the site on September 11 between you, Frank Hamedi-Fard, Hossein Kazemi, and me. However, there are several omissions in the plan, as outlined below.

1. **Soil aeration** is a potential problem if your consultant attempts it during the rainy season (which may have already begun, based on last weekend's storm!). Soil piles need runoff protection for rainy season aeration, and specifics of this runoff protection scheme should be included in the work plan. In addition, in consideration of the space constraints at the site, I'd like to know where your consultant plans to aerate the soil, and to what depth it would be spread.

2. **Piping removal and replacement** require a filled out closure/modification plan that specifies the contractor, to be submitted to this office, along with site-specific blueprints for the new piping installation, and a deposit of $744. The blueprints should include piping diagrams (plan views), details of joints and plumbing connections, and schematics of the proposed pipeline monitoring system.

3. **Tank removals** would require a closure plan to be submitted to this office, along with a deposit of $744. As we discussed, this can be treated as a "contingency plan," but must be submitted and approved as if the work will actually take place.

4. **Monitoring wells** require a groundwater protection permit from the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton, both for installation and destruction. The work plan indicated that these permits would be obtained from this office.

5. **Surface water sampling** details seem to conform to the September 11 on-site discussion; however, the Water Board is the only agency that can approve this portion of the work plan.

6. **Groundwater monitoring plans** described in Soil Tech Engineering's proposal may not be a sufficient condition for site signoff. Certainly, monitoring wells need to be sampled at least quarterly for a year or more, but groundwater treatment may be required. Therefore, the work plan should be written and the actual work designed to account for this likelihood. This will permit the development of the most efficient overall remediation plan for the site.

7. Be sure that all technical reports submitted on the site are signed by a California-registered geologist or certified engineering geologist.

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

Sincerely,

Gilbert M. Wistar

Gil Wistar
Hazardous Materials Specialist

c: Howard Hatayama, DOHS
Frank Hamedi-Fard, Soil Tech Engineering (298 Brokaw Rd., Santa Clara, CA 95050)
Craig Johns, Crosby, Heafey, Roach & May (1999 Harrison St., Oakland, CA 94612-3573)
Hossain Kazemi, RWQCB
Mike Koepke, Albany Fire Dept.
Rafat A. Shahid, Asst. Agency Director, Environmental Health
files

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

R0260

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

Certified Mailer # P 062 127 869

July 18, 1990

Mr. Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Dr.
Alameda, CA 94501

NOTICE OF VIOLATION

Dear Mr. Stevens:

In a letter dated December 7, 1989, the Alameda County Department of Environmental Health, Hazardous Materials Division set forth requirements for further work at the Plaza Car Wash at 400 San Pablo Ave. in Albany. These requirements were divided into three sections: A) Surface Water Quality; B) Groundwater Characterization; and C) Soil Characterization. Since this letter was sent, work has proceeded adequately in area A) above, but little or no work has occurred to define soil and groundwater contamination and to work towards remediation of these problems.

In several meetings, phone conversations, and correspondences between you and this office since early 1990, you stated that you were about to decide on whether or not to remove the tank systems at the site. We still have not heard anything from you on this subject; moreover, the decision on tank removal, while it may affect methods of soil characterization and remediation, has no bearing on groundwater definition and cleanup. According to the state Water Code, you are responsible for taking "diligent actions" to address surface and groundwater contamination; as things stand, however, a year has passed since the discovery of the underground release and free product still remains in monitoring wells downgradient from the point of release.

Because of these factors, you are in violation of Sec. 25299.37 of the California Health and Safety Code, which describes general corrective action requirements, especially in cases where the local agency has requested specific actions or reports. To correct this situation, you must submit a work plan to this office and to the Regional Water Quality Control Board that will lead to a Problem Assessment Report and a Remedial Plan for both soil and groundwater at the site. Removal of the tank systems may comprise part of the work plan, but will not be construed as a substitute for any remaining phase of the project.

The work plan, which is due on **August 23, 1990** regardless of the status of the tanks, must address at least the following points:

1. Installation and sampling of additional monitoring wells that will permit full definition of the contaminant plume(s).

2. Plan and schedule for removing free product from monitoring wells and/or the collection sump.

3. Sampling and taking water levels in all monitoring wells on at least a quarterly basis for the duration of the project.

4. Drilling of sufficient soil borings (or collection of samples during excavation) to enable contamination in the unsaturated zone beneath the site (and possibly off-site) to be defined.

5. Description of method for cleaning up contaminated soil, if found to be necessary.

6. **A schedule for performance of each of these activities, as well as for submission of a problem assessment report and submission of a site-specific remediation plan.**

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

Sincerely,

Gilbert M. Wistar

Gil Wistar
Hazardous Materials Specialist

c: Howard Hatayama, DOHS
Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection Division
Craig Johns, Crosby, Heafey, Roach & May (1999 Harrison St., Oakland, CA 94612-3573)
Hossain Kazemi, RWQCB
Mike Koepke, Albany Fire Dept.
Rafat A. Shahid, Asst. Agency Director, Environmental Health
files

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

R0260

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

December 7, 1989

Mr. Murray Stevens
Kamur Industries, Inc.
2351 Shoreline Dr.
Alameda, CA 94501

Re: **Follow-up to 11/29/89 meeting at the Water Board, regarding contamination at 400 San Pablo Ave., Albany**

Dear Mr. Stevens:

Last week, in a meeting held at the offices of the Regional Water Quality Control Board (RWQCB), representatives from your organization, Hossain Kazemi from the RWQCB, and I discussed work that had been done as well as work still needing to be done, at the Plaza Car Wash site. In work accomplished to date, the principal deficiency identified was the scarcity of data on the exact timing and concentration of hydrocarbon releases to El Cerrito Creek since the installation of the drainage sump at the end of Adams Ave. The summary report prepared by Subsurface Consultants, Inc., indicated that product has been seeping into the creek, but there was no information on when this occurred, how much product came out of the storm drain, or the dissolved hydrocarbon concentration in creek water upstream and downstream of the storm drain outlet. In addition, the lack of data on storm drain flow after significant rainstorms was noted.

Data collected from the site suggest that there may be a large plume of gasoline-contaminated groundwater underneath the site. There may also be pockets of contaminated soil that act as continuing sources of groundwater pollution, especially around the former piping leak. Moreover, soil gas surveys conducted by Subsurface Consultants show that the contaminated soil zone may be extensive. More data on both groundwater and soil needs to be developed; therefore, additional monitoring wells and soil borings should be installed and sampled as soon as possible. Ultimately, groundwater and/or soil remediation may be necessary, so that additional site work should be designed to provide sufficient information for remedial planning. All of these points were raised at the November 29 meeting.

At the meeting, it was decided that a work plan would be a desirable next step in the data-gathering process. The Alameda County Department of Environmental Health's Hazardous Materials Division is requiring that a work plan be prepared to address at least the points shown below. Your work plan must be submitted to this office and to the RWQCB no later than **December 29, 1989.**

A. Surface Water Quality -- El Cerrito Creek

1. Detailed information on product releases to the creek.
2. Information on dissolved levels of hydrocarbons in both upstream and downstream portions of the creek.
3. Data on the effects of rainstorms on surface water quality.
4. If necessary, and in consultation with the RWQCB, develop means to prevent hydrocarbon releases to the creek.

B. Groundwater Characterization

1. Installation and sampling of additional monitoring wells that will permit definition of the contaminant plume(s).
2. Sampling and taking water levels in all monitoring wells on a monthly basis throughout the duration of the project.
3. Water level monitoring of all wells after significant rainstorms to determine the effect of surface runoff on groundwater hydrology.

C. Soil Characterization

1. Drilling of sufficient soil borings to enable contamination in the unsaturated zone beneath the site (and possibly off-site) to be defined.
2. Description of method for cleaning up contaminated soil, if necessary.

The RWQCB may wish to specify additional requirements for the protection of surface water in the site vicinity.

One final point made at the November 29 meeting concerned the underground tanks and piping at the Plaza Car Wash facility. It is the view of this office that because part of the system failed, other parts of the system are likely to have corroded and may also fail in the near future. Although rigorous inventory reconciliation has been implemented at the site since discovery of the leak last summer, the Division feels that the underground system at the Plaza Car Wash could cause additional releases. If such a release occurred, it could add greatly to the complexity and expense of soil, groundwater, and surface water cleanup. Therefore, we suggest that you consider removal of the existing underground tank system in the near term, to prevent a repeat of the environmental damage that has occurred.

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

Sincerely,

Gilbert M. Wistar

Gil Wistar
Hazardous Materials Specialist

c: Hossain Kazemi, RWQCB
Craig Johns, Crosby, Heafey, Roach & May
Mike Koepke, Albany FD
Rafat A. Shahid, Asst. Agency Director, Environmental Health
files

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

R0260

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

Certified Mailer # P 833 981 481

July 17, 1989

Mr. Murray Stevens
Kamur Industries
2351 Shoreline Dr.
Alameda, CA 94501

Re: Underground tank permit applications and business plan filing, 400 San Pablo Ave., Albany

Dear Mr. Stevens:

After a telephone discussion with you on July 12, 1989, Gil Wistar of my staff searched our files and computer data base for the above materials, and no records of either could be found. You indicated that you had sent underground storage tank applications as well as a completed business plan to our office sometime over the past 3-4 years. However, because we do not have these documents in our files, we are requesting that you resubmit them to the address on the letterhead.

Your underground tanks at 400 San Pablo Ave. appear on the state of California list (six listed), but they must also be registered with Alameda County in order to be properly permitted. The state has developed new permit application forms ("A" and "B") for local agency registration, and blank copies of these are enclosed. Please fill out one form "A" for the facility and one form "B" for each tank at the facility. The business plan (blank also enclosed) must include: 1) an inventory of hazardous materials and wastes contained at the facility in volumes above 55 gal., or 200 cu. ft. for compressed gases; and 2) emergency response plans and procedures. Any business plan for the 400 San Pablo facility that has already been prepared may be photocopied and submitted as long as it covers both items above.

You are requested to submit these materials to this office by **August 14, 1989.** If you have any questions about this letter, contact Gil Wistar, Hazardous Materials Specialist, at 271-4320.

Sincerely,

R/ A. Shd

Rafat A. Shahid, Chief
Hazardous Materials Division

RAS/gmw: enclosures