

By Alameda County Environmental Health at 8:09 am, Mar 13, 2007

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March 9, 2007

REMEDIAL ACTION WORKPLAN

FOR AN OZONE-SPARGING REMEDIATION SYSTEM ASE JOB NO. 3934

at Albany Hill Mini Mart 800 San Pablo Avenue Albany, California

Submitted by:
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1.0 INTRODUCTION

This submittal presents Aqua Science Engineers, Inc. (ASE) Remedial Action Plan (RAP) for the design, installation, and operation of an ozone-sparging remediation system at the Albany Hill Mini Mart located at 800 San Pablo Avenue in Albany, California (Figure 1). This RAP was initiated by Dr. Joginder Sikand, owner of the property, as requested by the Alameda County Health Care Services Agency (ACHCSA) in their letter dated November 8, 2006 (Appendix A).

2.0 BACKGROUND INFORMATION

The subject site is currently a mini market and gasoline service station. It is ASE's understanding that the site has operated as a gasoline and diesel service station since 1930. Dr. Sikand, the present owner, purchased the property in 1973. At that time, three underground fuel storage tanks (USTs) operated at the site. These tanks consisted of two 500-gallon regular gasoline USTs and one 1,000-gallon super gasoline UST. In 1986, the site was remodeled and the three old USTs were removed and were replaced by four new USTs. These new USTs consisted of two 10,000-gallon gasoline USTs, one 6,000-gallon gasoline UST, and one 2,000-gallon diesel UST. The automotive repair operation also ceased at that time.

2.1 March 1997 Underground Storage Tank (UST) Removal & Installation

In March 1997, Superior Underground Tank Services removed five USTs (Figure 2). These USTs consisted of the four USTs installed in 1986 and one 750-gallon UST, which was previously unknown and was found during excavation activities at the site. Soil samples collected from the excavations following the UST removal contained up to 3,800 parts per million (ppm) total petroleum hydrocarbons as gasoline (TPH-G), 820 ppm total petroleum hydrocarbons as diesel (TPH-D), and detectable concentrations of benzene, toluene, ethylbenzene and total xylenes (collectively known as BTEX) and methyl tertiary butyl ether (MTBE). Groundwater samples collected from the excavations also contained elevated concentrations of TPH-G, TPH-D, BTEX and MTBE.

A new 12,000 gallon UST was installed on-site in front of the mini mart. It is compartmented into 8,000 gallons for gasoline, and 4,000 gallons for diesel. A 10,000 gallon UST exists along the southern property line (Figure 3).

2.2 August 1999 Preliminary Soil and Groundwater Assessment

In August 1999, Advanced Assessment and Remediation Services (AARS) conducted a preliminary soil and groundwater assessment at the site. This assessment included the installation of monitoring wells MW-1, MW-2 and MW-3 at the site (Figure 4). Sediments encountered during drilling generally consisted of clay from the ground surface to approximately 13-feet below ground surface (bgs), and sand or silty sand from 13-feet bgs to the total depth explored of 25-feet bgs. Groundwater was encountered at approximately 17-feet bgs and rose to



approximately 10.5-feet bgs in the completed monitoring wells. Relatively low concentrations of hydrocarbons were detected in soil samples collected from MW-1, and no hydrocarbons were detected in soil samples collected from MW-2 and MW-3. Groundwater samples collected from the monitoring wells contained up to 1,500 parts per billion (ppb) TPH-G, 1,200 ppb TPH-D, 4.3 ppb benzene, 2.9 ppb toluene, 9.1 ppb ethylbenzene, and 28 ppb total xylenes. The highest concentrations were in monitoring well MW-1, with much lower or non-detectable concentrations in the other two wells. The groundwater flow direction during this assessment was calculated to be to the southeast.

2.3 June 2001 Soil and Groundwater Assessment

In June 2001, AARS conducted an additional soil and groundwater assessment at the site, which included the drilling of four soil borings (SB-1 through SB-4), Figure 5. Hydrocarbons were detected in soil samples collected from approximately 10-feet bgs in all four borings. The highest concentrations were in SB-1, which contained 2,300 ppm TPH-G, 550 ppm TPH-D, 5.3 ppm benzene, 78 ppm toluene, 45 ppm ethylbenzene, and 330 ppm total xylenes. Elevated petroleum hydrocarbon concentrations were detected in groundwater samples collected in all four borings. The highest concentrations were in SB-2 and SB-4, which contained up to 8,900 ppb TPH-G, 19,000 ppb TPH-D, 1,400 ppb benzene, 1,900 ppb toluene, 280 ppb ethylbenzene, 1,300 ppb total xylenes, and 4,500 ppb MTBE.

2.4 June 2002 Soil and Groundwater Assessment

In June 2002, AARS conducted an additional soil and groundwater assessment at the site, which included the installation of six additional monitoring wells (MW-4 through MW-9), Figure 4. Hydrocarbons were detected in soil samples collected from all of these borings, with the highest concentrations detected in the soil samples collected from 11-feet bgs in MW-4 and 15-feet bgs in MW-9. All of the hydrocarbon concentrations in soil were well below the concentrations detected in previous boring SB-2. The groundwater samples collected from these new monitoring wells contained up to 24,100 ppb TPH-G, 19,000 ppb TPH-D, 2,300 ppb benzene, 1,900 ppb toluene, 1,050 ppb ethylbenzene, 5,410 ppb total xylenes, and 12,000 ppb MTBE.

2.5 June 2002 Area Well Survey

In June 2002, AARS also conducted an area well survey that identified wells within a 2,000-foot radius of the site. AARS listed seven wells in the site vicinity. However, all of the wells are over 2,000-feet from the site and none of the wells are domestic, municipal, irrigation or other water supply wells.



2.6 Quarterly Groundwater Monitoring

Between August 1999 and February 2003, groundwater samples were collected from the site monitoring wells on an approximate quarterly sampling schedule. The analytical results are tabulated in Tables One and Two.

2.7 October 2003 Area Conduit Study

In October 2003, ASE conducted a study of underground utility conduits in the site vicinity to determine if any of these conduits could be a potential preferred pathway for the movement of groundwater contamination in the site vicinity. This study was conducted by reviewing Underground Service Alert (USA) markings in the site vicinity, reviewing documents such as asbuilt drawings supplied by the city and individual utility companies, and contacting individuals that would have knowledge of the individual utility lines. None of the water, natural gas, electric, telephone, cable TV, or Caltrans communication conduits could be potential conduits based on their depth and the depth to groundwater in the site vicinity. There is a sewer line beneath San Pablo Avenue that, although currently above all historical depths to water, could potentially have been above the potentiometric surface during periods of extremely high water levels. However, since it appears that the actual water level is well below the potentiometric surface at the site, ASE does not believe that this line presents a potential preferred pathway for the movement of groundwater even during periods of a high water table.

2.8 August and October 2004 Soil and Groundwater Assessment

Between August and October 2004, ASE drilled soil borings BH-A through BH-Q using a Geoprobe hydraulic sampling rig (Figure 6). A dual-wall sampler was advanced to allow drilling through the first water-bearing zone into the second water-bearing zone while minimizing the possibility of cross-contamination. Due to the difficulty in drilling with a dual-wall sampler, all of the borings met with refusal before reaching the planned depth. In general, the analytical results show that elevated hydrocarbon concentrations are present in street areas immediately adjacent to the site to the north and to the east.

The extent of hydrocarbons appeared to be completely defined to the southeast as hydrocarbon concentrations detected in boring BH-Q drilled on the western side of San Pablo Avenue south of the site were below ESLs, and to the east as all of the hydrocarbon concentrations detected in borings drilled on the eastern side of San Pablo Avenue were below ESLs. The extent of hydrocarbons to the west was not yet defined based on the results from BH-M. However, based on the long distance to the next possible drilling location to the west, and based on the topographic gradient and unlikely groundwater flow in that direction, ASE did not recommend any further definition of the extent of hydrocarbons to the west at this time. The extent of hydrocarbons to the north of the site was not yet defined. ASE recommended further definition of the extent of hydrocarbons at the site, and vapor extraction and sparging tests at the site.



2.9 Replacement of Monitoring Well MW-5 and Installation of Monitoring Well MW-10

Monitoring well MW-5 was destroyed during a sewer replacement project in San Pablo Avenue. In September 2005, California Trenchless, Inc. contracted Heilshorn Environmental Engineering (HE2) at the request of the City of Albany to replace this well. Initially, the replacement well was installed in the wrong location. This was discovered when the well was already nearing completion. This well is currently on-site and is called MW-10. A new replacement well near the location of destroyed monitoring well MW-5 was also constructed and is known as MW-5R (Figure 4). It should be noted that the original monitoring well MW-5 was not properly destroyed but rather the casing was pulled out by the contractor and then the hole was filled with compacted rock. The new sewer line was then built directly over the old well location. In addition, the contractor that installed the new sewer line mentioned that three USTs were located while installing the sewer line near the site. Two USTs were located adjacent to the gas station in the street. These USTs were left in place. One other UST, filled with cement, was located just south of the gas station. This UST was removed.

2.10 Vapor Extraction and Ozone Sparging Well Installation

In December 2005, ASE installed three vapor extraction wells and three ozone sparging wells at the site (Figure 7). These wells were subsequently used to conduct vapor extraction and air sparging feasibility tests at the site.

2.11 January and February 2006 Soil and Groundwater Assessment

Between January 30, 2006 and February 2, 2006, ASE drilled soil borings BH-R through BH-X using an EP Sonic drill rig (Figure 6). The EP Sonic drill rig used a conductor casing to seal off shallower water-bearing zones to minimize the possibility of cross-contamination while drilling deeper borings. Although more successful with drilling using the EP Sonic rig than previous attempts using a dual-wall sampler, several borings still met with refusal prior reaching the planned depth. In general, hydrocarbons were only detected in soil samples collected at depths above 20.5-feet bgs. None of the deeper soil samples contained concentrations of hydrocarbons exceeding ESLs. High concentrations of TPH-G and BTEX were detected in groundwater samples collected from boring BH-V north of the site. These concentrations are higher than hydrocarbon concentrations closer to the site. Relatively high MTBE concentrations were detected in boring BH-T, northwest of the site. Moderate TPH-G and total xylene concentrations were detected in groundwater samples collected from boring BH-X, south of the site. No significant MTBE concentrations have been detected in groundwater samples collected from borings south of the site. Based on these results, it was determined that additional assessment was needed to define the extent of hydrocarbons north of the site.



2.12 Remediation Feasibility Tests and Corrective Action Plan

In March 2006, ASE conducted a vapor-extraction (VE) test at the site. The data gathered during the VE test proved that the technology of vapor extraction would not be a useful tool to capture a sizeable radius of impacted vadose zone hydrocarbons.

In April 2006, ASE conducted an air sparging test at the site. Ozone-sparging well OS-2 was chosen as the injection well due to its proximity in relation to sparging wells OS-1 and OS-3. Monitoring wells MW-2 and MW-6 and vapor extraction well VE-2 were used for observation of influence from the injected air/helium mixture. The test consisted of measuring positive pressure in surrounding wells, measuring for helium that was injected in OS-2 as a tracer gas, and measuring water levels in monitoring wells at the site. As for positive pressure, the test showed a brief influence 20-feet away in MW-2, however, that influence was only measured for a period of approximately one hour. As for helium measurements, the test indicates a radius of influence of approximately 20-feet in OS-3. The water level rose 0.01-feet in MW-2, and 0.02-feet in MW-3 and MW-6 during the test.

Several remediation options were considered and discussed in ASE's Corrective Action Plan (CAP) dated June 28, 2006. ASE concluded that ozone-sparging would be the most cost-effective remediation strategy for the site.

3.0 OZONE SPARGING DESCRIPTION

Ozone sparging is the process of adding an ozone/air mixture into a water-bearing zone contaminated with organic compounds. The ozone acts as an oxidant, which will destroy organic hydrocarbons. Ozone can oxidize contaminants either directly or through the formation of hydroxyl radicals. In situ decomposition of ozone can also lead to beneficial oxygenation and biostimulation. In addition, since a gas is injected, it may be possible for some remediation to also take place in the vadose zone as well.

4.0 REMEDIATION SYSTEM DESIGN

4.1 Ozone-Sparging Wells

The proposed remediation system will incorporate the use of nine (9) ozone-sparge wells. Previous wells OS-1 and OS-3 will be used for ozone sparging. OS-2 will not be used because it does not fit within the preferred grid pattern. OS-2 will be properly destroyed. The locations of these wells are shown on Figure 8. A cross-sectional view of a typical ozone sparging well is included in Appendix B. ASE is assuming a conservative radius of influence of 15-feet based on data from the air-sparging test at the site. The wells will be located to destroy hydrocarbons surrounding and downgradient of the USTs. All nine ports on the ozone generation unit will be utilized.



The wells will be drilled with a drill rig equipped with 5-inch diameter hollow-stem augers. The wells will be constructed with 1-inch diameter PVC well casing. Ozone will be sparged from the casing through a 1.5-inch diameter by 18-inch long, 25 micron pore size sparge point. These sparge points will be placed, for the most part, at the bottom of the most permeable water-bearing zone in each well location. Based on a review of the boring logs, ASE believes that all or a majority of the sparge points will be placed at 26 to 27.5-feet below ground surface. Lonestar #2/16 or finer sand will be placed between the sparge point and the boring from the bottom of the boring to 1-foot above the top of the sparge point. A 2-foot thick bentonite layer will be placed on top of the sandpack, followed by a Portland cement sanitary seal to prevent surface water from infiltrating into the well. The wellheads will be piped directly into an ozone-sparging manifold, which will then be piped directly to the ozone generator.

4.2 Ozone Generator

The remediation system will utilize a Self-Contained Ozone Sparge Unit, Model OSU10-52, built by H2OEngineering of San Luis Obispo, CA. The OSU10-52 is a compact unit that generates an air/ozone mixture on-site. The unit will then pump the air/ozone mixture through nine ports, one port at a time, on a cycle set by a timer. The air/ozone flow is approximately 4 cubic feet per minute (cfm) at a pressure of up to 50 pounds per square inch (psi), although 20-30 psi is more typical. Each sparge point will receive the air/ozone mixture for anywhere from 15 to 60 minutes per cycle. The cycle timing will be programmed and cycle duration adjusted as needed. Each day, the OSU10-52 will provide up to 2.7 pounds of ozone per day at a concentration of 3,570 ppmv. The entire unit operates on 120-volt power. A diagram of the OSU10-52 is enclosed in Appendix B.

4.3 Manifold System

The air/ozone mixture will be pumped through double contained ozone-resistant teflon tubing from the OSU10-52 system to the sparging wells. Figure 9 shows the proposed pipe layout. This tubing consists of a 3/8-inch diameter inner transport tubing within a 1-inch schedule 40 PVC secondary-containment tube. This tubing is flexible and will be buried through narrow trenches cut through the concrete surface. The tubing will be placed into the trenches, buried with sand and covered with concrete.

5.0 OPERATION, MONITORING AND REPORTING

The system will operate continuously 24-hours a day, 7 days a week. The system will be checked daily for the first week of operation and weekly thereafter. During the first week of operation, dissolved oxygen will be measured in all site groundwater monitoring wells to verify that ozone is being distributed as designed. In addition to the scheduled quarterly groundwater monitoring at the site, ASE will also conduct interim groundwater sampling one month after system startup, 2 months after system startup and one sampling in the period between regularly scheduled quarterly monitoring periods approximately 4 months after system startup. Results of



the interim sampling will be reported in the normal quarterly report and will be addressed in detail in a report to be completed after 6-months of operation.

6.0 SPECULATION OF SYSTEM EFFECTIVENESS

ASE has had the opportunity to install, operate and maintain an ozone-sparging system similar to the one proposed in this document at a site in Tracy, California. The Tracy site had concentrations of MTBE and TBA within the same order of magnitude as the Albany Hill site. Within a few months of operation of the ozone-sparging system, the concentrations of hydrocarbons and oxygenates began dropping. After approximately 24 months of operation, the concentrations had dropped 3 orders of magnitude. ASE believes similar reductions would be achieved at the Albany Hill Mini Mart site.

At the point in time when hydrocarbon and oxygenate concentrations have dropped to a satisfactory level, ASE will likely request a period of system down-time, to determine if any rebounding of concentrations occur. If rebounding is not observed, ASE will likely request closure, and decommission the ozone-sparging system. The wells and delivery tubing will likely remain in place so that, in the event of a future need for remediation, the system could be returned to the site at a much lower cost.

7.0 SCHEDULE

ASE will submit costs for the installation and operation of this remediation system to the California Underground Storage Tank Cleanup Fund for cost pre-approval upon approval of this Remedial Action Workplan by the Alameda County Health Care Services Agency. ASE will begin construction of the remediation system immediately upon pre-approval of the costs from the UST Cleanup Fund.

-7-



Should you have any questions or comments, please call us at (925) 820-9391.

Respectfully submitted,

AQUA SCIENCE ENGINEERS, INC.

David Allen, R.E.A.

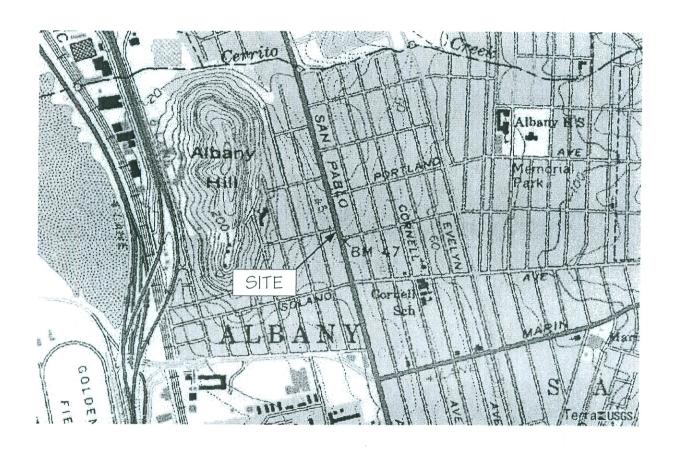
Vice President

Robert E. Kitay, P.G., R.E.A. Senior Geologist



FIGURES





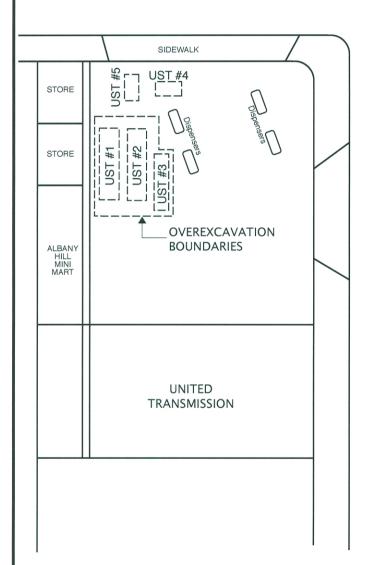
LOCATION MAP

ALBANY HILL MINI MART 800 SAN PABLO AVENUE ALBANY, CALIFORNIA

AQUA SCIENCE ENGINEERS, INC.



WASHINGTON AVENUE



SAN PABLO AVENUE

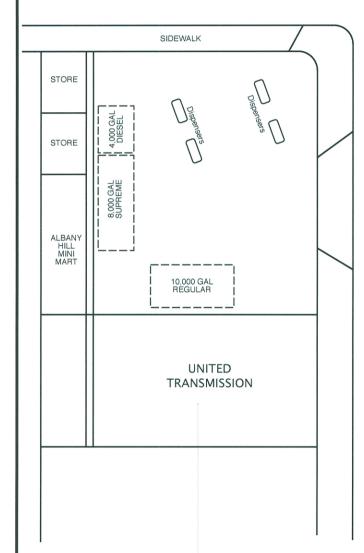
SITE PLAN SHOWING USTs REMOVED IN 1997

ALBANY HILL MINI MART 800 SAN PABLO AVENUE ALBANY, CALIFORNIA

AQUA SCIENCE ENGINEERS



WASHINGTON AVENUE



SAN PABLO AVENUE

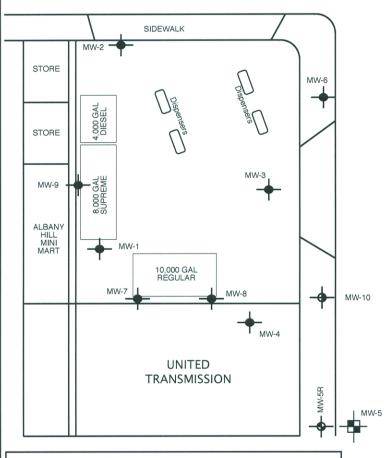
SITE PLAN SHOWING USTs INSTALLED IN 1997

ALBANY HILL MINI MART 800 SAN PABLO AVENUE ALBANY, CALIFORNIA

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WASHINGTON AVENUE



SAN PABLO AVENUE

LEGEND



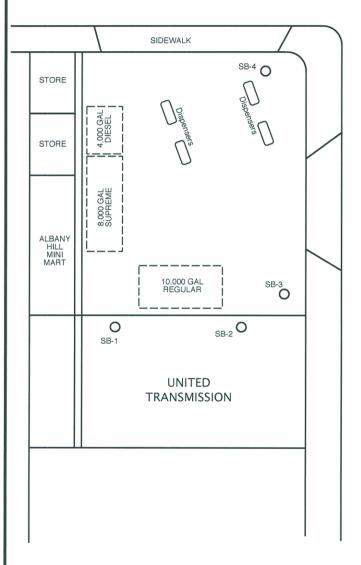
MONITORING WELL LOCATION MAP

ALBANY HILL MINI MART 800 SAN PABLO AVENUE ALBANY, CALIFORNIA

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WASHINGTON AVENUE



SAN PABLO AVENUE

LEGEND

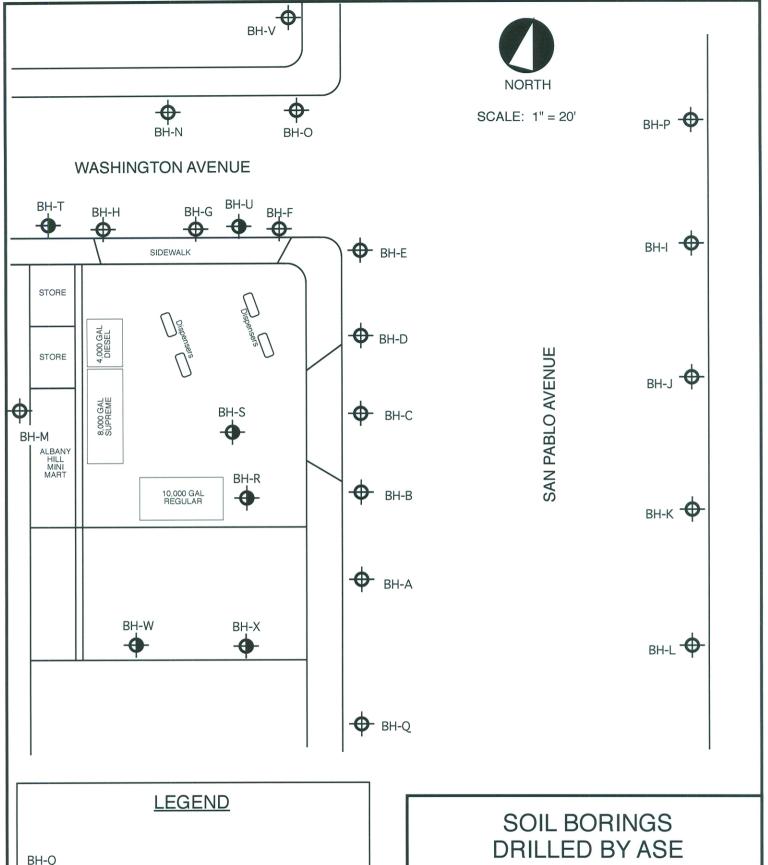
SB-2

SOIL BORING, DRILLED BY AARS, JUNE 2001

SOIL BORINGS DRILLED BY AARS - JUNE 2001

ALBANY HILL MINI MART 800 SAN PABLO AVENUE ALBANY, CALIFORNIA

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SOIL BORING, DRILLED BY ASE, BETWEEN AUGUST AND OCTOBER 2004 SOIL BORING, DRILLED BY ASE, BETWEEN JANUARY AND FEBRUARY 2006

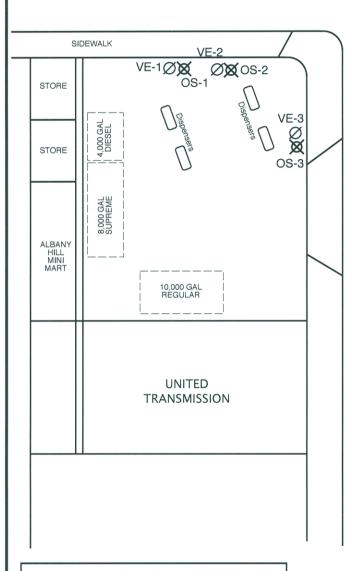
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SAN PABLO AVENUE

LEGEND

OS-1

X

AIR-SPARGING WELL

VE-1Ø

VAPOR EXTRACTION WELL

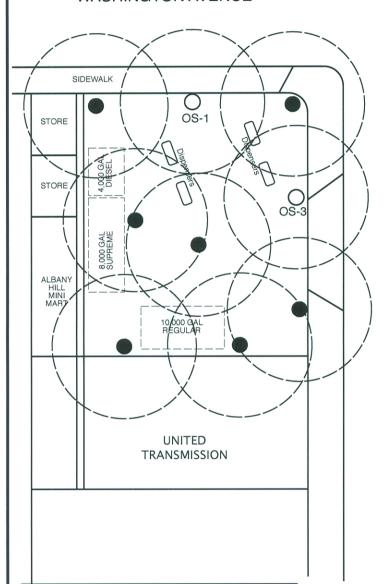
EXISTING OZONE-SPARGING & VAPOR EXTRACTION WELL LOCATION MAP

ALBANY HILL MINI MART 800 SAN PABLO AVENUE ALBANY, CALIFORNIA

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LEGEND

OS-1

EXISTING AIR-SPARGING WELL



PROPOSED AIR-SPARGING WELL



PRESUMED RADIUS OF INFLUENCE

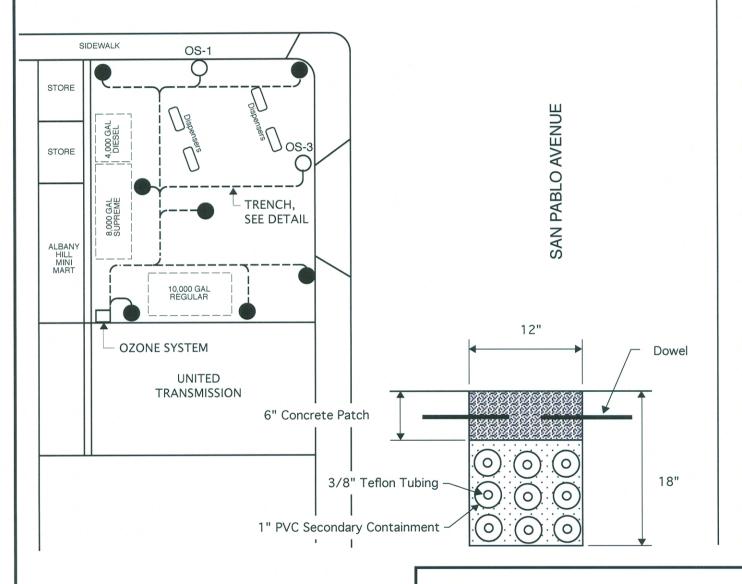
OZONE-SPARGING WELL RADIUS OF INFLUENCE MAP

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OS-1 EXISTING AIR-SPARGING WELL PROPOSED AIR-SPARGING WELL

OZONE-SPARGE WELL AND TRENCH LAYOUT MAP

ALBANY HILL MINI MART 800 SAN PABLO AVENUE ALBANY, CALIFORNIA

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TABLES

TABLE ONE

Groundwater Elevation Data Albany Hill Mini Mart

800 San Pablo Avenue, Albany, CA

Well ID	Date of Measurement	Top of Casing Elevation* (feet)	Depth to Water (feet)	Groundwater Elevation (feet)
MW-1	8/6/99 11/5/99 2/7/00 5/5/00 8/3/00 11/8/00 2/8/01 6/7/01 9/7/01 12/13/01 6/13/02 9/11/02 2/14/03 9/10/04 12/7/04 4/18/05 6/20/05 10/7/05	101.68	11.95 12.72 10.34 10.59 11.75 11.67 11.20 11.35 11.71 10.67 11.42 12.42 10.69 13.83 12.18 9.92 10.64 12.42 11.51	89.73 88.96 91.34 91.09 89.93 90.01 90.48 90.33 89.97 91.01 90.26 89.26 35.73 32.59 34.24 36.50 35.78 34.00 34.91
	3/6/06 6/27/06 8/24/06 11/20/06 2/5/07	48.82	9.35 10.07 12.02 12.02 11.68	39.47 38.75 36.80 36.80 37.14
MW-2	8/6/99 11/5/99 2/7/00 5/5/00 8/3/00 11/8/00 2/8/01 6/7/01 9/7/01 12/13/01 6/13/02 9/11/02 2/14/03	101.57 45.31	10.83 11.66 9.23 9.54 10.69 10.62 10.17 10.30 10.65 9.65 10.37 11.32 9.59	90.74 89.91 92.34 92.03 90.88 90.95 91.40 91.27 90.92 91.92 91.20 90.25 35.72
	9/10/04 12/7/04 4/18/05 6/20/05 10/7/05 12/7/05 3/6/06 6/27/06 8/24/06 11/20/06 2/5/07	47.71	9.59 11.78 11.13 8.71 9.60 11.39 11.49 8.22 9.45 10.35 10.87	33.53 34.18 36.60 35.71 33.92 33.82 39.49 38.26 37.36 36.84 37.18

TABLE ONE

Groundwater Elevation Data Albany Hill Mini Mart

800 San Pablo Avenue, Albany, CA

Well ID	Date of Measurement	Top of Casing Elevation* (feet)	Depth to Water (feet)	Groundwater Elevation (feet)
MW-3	8/6/99	100.33	10.58	89.75
	11/5/99		11.39	88.94
	2/7/00		9.05	91.28
	5/5/00		9.29	91.04
	8/3/00		10.43	89.90
	11/8/00		10.33	90.00
	2/8/01		9.94	90.39
	6/7/01		10.04	90.29
	9/7/01		10.31	90.02
	12/13/01		9.38	90.95
	6/13/02		10.03	90.30
	9/11/02		11.02	89.31
	2/14/03	45.08	9.40	35.68
	9/10/04		12.51	32.57
	12/7/04		11.86	33.22
	4/18/05		8.49	36.59
	6/20/05		9.34	35.74
	10/7/05		11.11	33.97
	12/7/05		10.22	34.86
	3/6/06	47.49	8.84	38.65
	6/27/06		6.07	41.42
	8/24/06		10.26	37.23
	11/20/06		10.52	36.97
	2/5/07		10.41	37.08
MW-4	6/13/02	100.05	10.18	89.87
	9/11/02		11.12	88.93
	2/14/03	45.20	9.51	35.69
	9/10/04		11.59	33.61
	12/7/04		10.91	34.29
	4/18/05		8.62	36.58
	6/20/05		9.45	35.75
	10/7/05		11.20	34.00
	12/7/05		10.30	34.90
	3/6/06	47.61	8.19	39.42
	6/27/06		9.71	37.90
	8/24/06		10.43	37.18
	11/20/06		10.70	36.91
	2/5/07		10.60	37.01
MW-5	6/13/02	98.37	8.88	89.49
	9/11/02		9.95	88.42
	2/14/03	44.12	8.66	35.46
	9/10/04		10.26	33.86
	12/7/04		10.79	33.33
	4/18/05	Well Destroyed by City Du		
	6/20/05	Well Destroyed by City Du	ring Street Const	ruction

TABLE ONE

Groundwater Elevation Data Albany Hill Mini Mart

800 San Pablo Avenue, Albany, CA

Well ID	Date of Measurement	Top of Casing Elevation* (feet)	Depth to Water (feet)	Groundwater Elevation (feet)
MW-5R	10/7/05 12/7/05 3/6/06 6/27/06 8/24/06 11/20/06 2/5/07	47.36	10.94 9.97 4.93 9.47 10.10 10.00 10.21	42.43 37.89 37.26 37.36 37.15
MW-6	6/13/02 9/11/02 2/14/03 9/10/04 12/7/04 4/18/05 6/20/05 10/7/05 12/7/05 3/6/06 6/27/06 8/24/06 11/20/06 2/5/07	99.36 43.88 46.27	8.85 9.82 8.21 10.33 9.83 7.08 7.52 10.92 8.85 6.22 7.40 9.15 10.40 9.20	90.51 89.54 35.67 33.55 34.05 36.80 36.36 32.96 35.03 40.05 38.87 37.12 35.87 37.07
MW-7	6/13/02 9/11/02 2/14/03 9/10/04 12/7/04 4/18/05 6/20/05 10/7/05 12/7/05 3/6/06 6/27/06 8/24/06 11/20/06 2/5/07	100.96 45.59 not sampled 48.36	10.95 11.90 10.25 12.35 11.42 9.34 10.19 12.96 8.92 10.41 11.21 11.46 11.34	90.01 89.06 35.34 33.24 34.17 36.25 35.40 32.63 39.44 37.95 37.15 36.90 37.02

TABLE ONE

Groundwater Elevation Data Albany Hill Mini Mart

800 San Pablo Avenue, Albany, CA

		Top of Cosins	Donth to	Groundwater
Well	Date of	Top of Casing Elevation*	Depth to Water	Elevation
		(feet)	(feet)	(feet)
ID MW-8	Measurement 6/13/02	100.54	10.57	89.97
MAA-O	9/11/02	100.34	11.53	89.01
	2/14/03	45.59	9.98	35.61
	9/10/04	43.39	11.98	33.61
			11.42	34.17
	12/7/04		8.99	36.60
	4/18/05			
	6/20/05		9.83	35.76
	10/7/05		11.60	33.99
	12/7/05	47.00	11.69	33.90
	3/6/06	47.99	8.58	39.41
	6/27/06		10.06	37.93
	8/24/06		10.77	37.22
	11/20/06		11.12	36.87
	2/5/07		10.97	37.02
MW-9	2/14/03	46.86	10.84	36.02
	9/10/04		12.97	33.89
	12/7/04		12.84	34.02
	4/18/05		9.75	37.11
	6/20/05		10.83	36.03
	10/7/05		12.59	34.27
	12/7/05		12.56	34.30
	3/6/06	49.24	10.24	39.00
	6/27/06		9.83	39.41
	8/24/06		11.91	37.33
	11/20/06		12.42	36.82
	2/5/07		11.95	37.29
MW-10	10/7/05		10.52	
14144-10	12/7/05	not sampled	10.52	
	3/6/06	46.90	7.46	39.44
	6/27/06	10.50	9.03	37.87
	8/24/06		9.75	37.15
	11/20/06		10.30	36.60
	2/5/07		9.83	37.07
Notes:	2/3/0/		3.03	37.07

Notes:

Data prior to September 10, 2004, including survey data, is based on tables compiled by AARS. * Top of casing elevations were initially surveyed to an arbitrary benchmark. The elevations were resurveyed on November 11, 2002 with respect mean sea level.

TABLE TWO

Summary of Analytical Results for **GROUNDWATER** Samples Albany Hill Mini Mart 800 San Pablo Avenue, Albany, CA All results are in **parts per billion (ppb)**

Well ID or	Date	TPH Gasoline	TPH Diesel	Benzene	Toluene	Ethyl- benzene	Total Xylenes	TAME	TBA	MTBE	Other VOCs
Sample Point MW-1	8/6/99	1,500	1,200	4.3	2.9	9.1	28			ND	
INIAA-I	11/5/99	1,800	1,400	5.1	3.2	8.9	33			ND	
	2/7/00	1,100	890	3.3	1.9	5.6	21			ND	
	5/7/00	970	650	2.9	1.7	4.9	18			ND	
	8/3/00	1,200	270* 230*	190 990	43.0 200.0	41 130	160 560			360 840**	I
	11/8/00 2/8/01	4,200 2,800	380*	630	130.0	51	250			390	
	6/7/01	650	190	97	13.0	20	62			320	
	9/7/01	970	400	260	17.0	44	140			460	
	12/13/01	291	< 50	91.7	1.4	17.4	7.2			499	
	6/13/02 11/11/02	5,120 824	2,160* < 50	1,860 216	22.0 < 5	316 22	318 20			325 290	
	2/14/03	1,783	590*	546	5.0	90	52			321	
	9/10/04	900	82	210	8.4	52	23	< 0.5	5.1	220	< 0.5
	12/7/04	540	< 80	130	3.1	24	14	< 0.5	< 5.0	240	< 0.5
	4/18/05 6/20/05	1,600 2,500	< 200 < 300	390 740	3.6 12.0	32 110	57 69	< 0.5 < 0.5	< 5.0 5.7	240 240	0.53 1,2-DCA < 0.50
	10/7/05	520	130	97	26.0	11	28	< 0.50	<5.0	190	< 0.50
	12/7/05	220	86	42	11.0	6.2	12	< 0.50	<5.0	230	< 0.50
	3/6/06	180	69	63	1.6	3.8	2.3	< 0.50	< 0.50	180	< 0.50
	6/27/06 8/24/06	2,800 3,200	< 300 < 200	1,100 1,100	7.1 6.6	140 170	44 16	< 0.50 < 2.0	9.9 < 9.0	220 250	< 0.50 < 2.0
	11/20/06	630	< 50	170	1.2	22	2.8	< 0.50	6.2	220	< 0.50
	2/5/07	570	< 50	180	1.0	23	3.4	< 0.50	<5.0	180	<0.50
MW-2	8/6/99	ND	340	ND	ND	ND	ND			ND	
	11/5/99	ND	420	ND ND	ND ND	ND ND	0.7 0.6			ND ND	
	2/7/00 5/7/00	ND ND	310 280	ND	ND	ND	< 1			ND	Ι
	8/3/00	460	70*	79	3.0	43	8			3,300	
	11/8/00	200	120	57	2.0	13	8			3,000	
	2/8/01	290	80	50	1.0	0.6	4 5			3,100	
	6/7/01 9/7/01	210 230	80 ND	18 51	0.6 ND	3 8	8			2,000 2,400	
	12/13/01	172	ND	53	1.2	7.7	8.4			1,780	
	6/13/02	86	< 50	6	6.7	1.1	4.5			1,830	
	11/11/02 2/14/03	1,040 82	< 50 < 50	5 8	1.0 < 1	< 1 1	5 < 3			1,250 1,520	_
	9/10/04	< 100	72	1.6	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	620	< 1.0
	12/7/04	< 150	86	17	< 1.5	< 1.5	< 1.5	< 1.5	< 7.0	540	< 1.5
	4/18/05	280	130	55	< 1.5	4.4	< 1.5	< 1.5	< 20	840	< 1.5 < 0.90
	6/20/05 10/7/05	200 <90	100 150	34 11	< 0.90 <0.90	2.4 <0.90	2.7 <0.90	< 0.90 <0.90	5.2 <5.0	540 360	< 0.90
	12/7/05	<90	110	1.5	< 0.90	< 0.90	< 0.90	< 0.90	<5.0	500	<0.90
	3/6/06	< 90	88	7.0	< 0.90	< 0.90	< 0.90	< 0.50	5.2	610	< 0.50
	6/27/06	270	150	49	< 0.50	5.1	3.4	0.58	8.9	540	< 0.50
	8/24/06 11/20/06	110 56	120 < 50	13 5.6	< 0.50 < 0.50	1.3 < 0.50	< 0.50 < 0.50	< 0.50 < 0.50	< 5.0 < 5.0	480 330	< 0.50 < 0.50
	2/5/07	98	< 50	28	< 0.50	< 0.50	< 0.50	0.61	< 5.0	500	< 0.50
MW-3	8/6/99	ND	ND	ND	ND	ND	ND			ND	
	11/5/99	92	54	ND	ND	0.6	1.7			ND	
	2/7/00	120	71	ND	0.6	0.8	2.2 1.9			ND ND	
	5/7/00 8/3/00	100 910	68 300*	ND 220	ND 9.0	0.7 35	1.9			11,000**	I
	11/8/00	990	200	320	0.8	18	9			8,000	
	2/8/01	990	110	180	21.0	7	24			5,200**	
	6/7/01	370	140	62	4.0	8	13			6.600**	-
	9/7/01 12/13/01	460 251	ND ND	87 66.8	1.0 0.9	11 2.6	25 8.4			9,400** 6,610	_
	6/13/02	3,630	< 50	41	60.0	41	187			8,820**	
	11/11/02	6,210	< 50	150	< 1	5	< 3			7,770	
	2/14/03	176	< 50	31	< 1	2	< 3	20	200	5,040	10
	9/10/04 12/7/04	< 1,000 1,000	140 150	110 310	< 10 19.0	< 10 24	21 50	20 21	200 < 100	4,400 4,000	< 10 < 10
	4/18/05	750	150	170	16.0	33	36	6.1	< 50	1,700	< 5.0
	6/20/05	680	120	140	9.7	20	38	7.4	< 20	1,900	< 4.0
	10/7/05	630	160	140	10.0	11	34	9.2	<20	2,000	< 4.0
	12/7/05 3/6/06	550 88	200 36	128 < 2.0	6.4 5.3	7.2 2.1	10 4.2	11 13	56 1,000	2,400 1,000	< 4.0 < 2.0
	6/27/06	7,400	< 1,500	2,800	12	190	56	9.8	110	760	< 4.0
	8/24/06	< 400	130	24 42	< 4.0 < 4.0	< 4.0 4.4	14 8.7	9.0 7.3	40 71	2,800 1,700	< 4.0 < 4.0
	11/20/06 2/5/07	< 400 440	< 50	110	< 4.0 4.2	< 4.4	16	7.3 7.3	39	1,600	< 4.0 < 4.0
	_, _, _,		- 00								

TABLE TWO

Summary of Analytical Results for GROUNDWATER Samples Albany Hill Mini Mart 800 San Pablo Avenue, Albany, CA All results are in parts per billion (ppb)

Well ID or Sample Point	Date Sampled	TPH Gasoline	TPH Diesel	Benzene	Toluene	Ethyl- benzene	Total Xylenes	TAME	TBA	MTBE	Other VOCs
MW-4	6/13/02 11/11/02 2/14/03 9/10/04 12/7/04 4/18/05 6/20/05 10/7/05	4,460 5,150 6,360 1,600 1,900 10,000 6,100 3,200	1,500* 2,380* 2,410* 180 < 200 < 800 < 600 < 500	425 2,010 1,560 370 450 1,500 830 660	409.0 74.0 82.0 6.5 8.2 27.0 19.0 8.7	115 399 274 68 72 420 280 110	730 252 573 93 100 900 400 140	 < 1.0 < 0.9 < 1.5 < 1.5	 10 5.4 15 17 12 < 5.0	32 < 20 < 1 13 9.5 18 22 14	 1.1 (DIPE) < 0.9 < 1.5 < 1.5 < 1.5 < 0.5
	12/7/05 3/6/06 6/27/06 8/24/06 11/20/06 2/5/07	1,000 1,200 2,000 2,500 1,900 2,700	< 200 < 300 < 300 < 300 < 80 < 80	220 280 570 830 590 970	2.5 2.1 4.0 6.5 4.8 4.4	48 32 110 120 37 53	37 77 120 120 29 62	< 0.5 0.65 < 0.90 < 0.90 < 1.5 < 1.5	< 0.50 < 0.50 15 18 < 1.5 < 1.5	75	1.0 (DIPE) / 1.57(1,2-DCA) 1.2(DIPE) < 0.90 < 1.5 < 1.5
MW-5	6/13/02 11/11/02 2/14/03 9/10/04 12/7/04 4/18/05	536 3,270 1,260 1,300 1,000	< 50 1,230* 610* 150 < 200	6.4 < 1 9 2.4 4.1 Improperly	0.6 < 1 7.0 < 0.50 < 0.50 Destroyed b	22 28 22 0.77 1.4 by City of All	23 8 5 < 0.50 < 0.50 bany During	 < 0.50 < 0.50 street Imp	 < 5.0 < 5.0 rovements	11 < 1 < 1 < 0.50 < 0.50	 < 0.50 < 0.50
MW-5R	10/7/05 12/7/05 3/6/06 6/27/06 8/24/06 11/20/06 2/5/07	760 5,200 6,300 5,100 6,500 5,400 6,300	<800 < 2,000 < 3,000 < 2,000 < 2,000 < 600 < 1,500	2 36 44 53 80 160 69	< 0.50 1.0 1.2 1.3 1.8 2.4 3.2	8.3 320 370 370 510 370 480	1.2 15 19 17 18 100 31	< 0.50 < 0.50 < 0.90 < 0.50 < 0.90 < 0.90 < 0.80	< 5.0 < 5.0 5.9 5.6 9.9 10	< 0.50 < 0.50 < 0.90 < 0.50 < 0.90 81 < 0.80	< 0.50 < 0.50 < 0.90 < 0.50 < 0.90 < 0.90 < 0.80
MW-6	6/13/02 11/11/02 2/14/03 9/10/04 12/7/04 4/18/05 6/20/05 10/7/05 3/6/06 6/27/06 8/24/06 11/20/06 2/5/07	2,980 3,570 3,770 < 1,000 1,800 1,200 590 470 420 790 2,600 1,200 1,300 1,200	1,460* 1,210* 1,620* 390 < 600 1,400 1,300 1,300 910 590 980 960 < 200 < 200	31 336 429 2.7 32 34 3.3 6.8 10 3.2 100 57 58 49	2.3 5 12 < 0.50 1.7 1.3 < 0.50 < 0.50 < 0.50 < 0.50 < 0.50 4.0 2.3 1.7 1.8	3.8 < 5 7 < 0.50 < 0.50 < 0.50 < 0.50 < 0.50 < 0.50 < 0.50 < 0.50 < 0.50 < 0.50 < 0.50 < 0.50 < 0.50 < 0.50	12 <15 10 <0.50 1.1 0.90 <0.50 <0.50 <0.50 <0.50 1.1 1.3	2.3 2.2 0.86 < 0.50 0.67 < 0.50 0.50 1.0 0.82 < 0.50 0.9	 48 49 19 5.5 20 7.3 < 0.50 49 34 18 45	310 95 122 280 160 36 8.5 82 22 4.3 78 64 26	
MW-7	6/13/02 11/11/02 2/14/03 9/10/04 12/7/04 4/18/05 6/20/05 10/7/05 12/7/05 3/6/06	24,100 4,760 4,320 4,800 990 1,400 1,900 2,600	1,570* 2,160* 2,380* < 300 < 300 < 300 < 200 <800 < 200	2,310 1,820 1,020 640 140 260 320 190	0.88	945 316 223 250 49 96 130 91 ot sampled. 24	30	< 0.50	 31 < 20 20 17 8.0J	951 702 1,410 590 960 370 370 310	 1.5 2.0 1.0 0.50 0.50 0.50
	6/27/06 8/24/06 11/20/06 2/5/07	1,200 990 1,600 2,300	< 200 < 200 < 200 < 200	180 120 200 390	1.7 0.96 1.6 2.6	64 36 59 120	64 51 160 140	< 0.50 < 0.50 < 0.50 < 0.50	14 13 5.2 15	150 180 180 190	< 0.50 < 0.50 < 0.50 < 0.50
MW-8	6/13/02 11/11/02 2/14/03 9/10/04 12/7/04 4/18/05 6/20/05 10/7/05 12/7/05 3/6/06	20,000 5,010 1,980 < 2,000 < 1000 1,300 < 700 1,400	7,760* 2,010* < 50 200 280 250 300 200 300	2,200 187 607 110 420 76 190 85 250	1,140 < 1 6 < 20 < 10 < 10 < 7.0 < 7.0 8.7 No.	1,050 15 113 26 40 23 21 9.3 41 ot sampled. 7.8	4,090 < 3 40 49 61 < 10 40 8.3 90 Inaccessab	 25 31 17 19 23 18 ole	 < 200 100 < 100 < 40 < 40 < 40	12,000 16,600 11,500 8,600 6,800 3,700 3,400 4,400 4,400	
	6/27/06 8/24/06 11/20/06 2/5/07	540	260 < 100 < 100	74 380 560	< 5.0 < 5.0 4.4 3.9	7.8 5.4 18 7.5	45 170 80	15 10 2.7	< 25 530 970	2,700 1,900 630	< 5.0 < 5.0 < 4.0 < 1.0

TABLE TWO

Summary of Analytical Results for **GROUNDWATER** Samples

Albany Hill Mini Mart 800 San Pablo Avenue, Albany, CA All results are in parts per billion (ppb)

Well ID or	Date	TPH	TPH			Ethyl-	Total				Other
Sample Point	Sampled	Gasoline	Diesel	Benzene	Toluene	benzene	Xylenes	TAME	TBA	MTBE	VOCs
MW-9	6/27/02	19,000		1,430	1,750	501	5,410			< 0.5	
1.111	11/11/02	19,000	13,200*	3,390	4,540	1,020	9,050			549	
	2/14/03	21,300	8.200*	1,700	2,200	701	4,970			< 1	
	9/10/04	12,000	< 1,500	890	37	280	2,000	< 5.0	< 50	< 5.0	< 5.0
	12/7/04	13,000	< 1,500	950	580	480	2,900	< 5.0	< 50	< 5.0	< 5.0
	4/18/05	9,600	< 1,000	620	180	260	1,400	< 2.5	< 25	< 2.5	< 2.5
	6/20/05	9,800	< 1,500	760	260	430	1,400	< 2.0	< 9.0	< 2.0	< 2.0
	10/7/05	3,400	<1000	350	170	100	480	< 0.50	< 5.0	< 0.50	< 0.50
	12/7/05	5,600	< 1000	320	97	200	580	< 0.90	< 5.0	< 0.50	< 0.50
	3/6/06	4,200	< 800	460	120	97	600	< 0.90	< 5.0	< 0.90	< 0.50
	6/27/06	8,100	< 1,000	710	330	390	1,700	< 0.50	< 5.0	< 2.0	< 0.50
	8/24/06	6,100	< 800	550	220	280	1,200	< 2.0	< 9.0	< 2.0	< 2.0
	11/20/06	5,200	< 400	310	98	130	850	< 1.0	< 5.0	< 1.0	< 1.0
	2/5/07	4,500	< 400	370	120	190	720	< 1.0	< 5.0	< 1.0	< 1.0
MW-10	10/7/05	470	330	17	< 0.50	2	11	1.2	9.4J	210	<0.50
	12/7/05					t sampled.	Inaccessabl	le			
	3/6/06	130	130	4.2	< 0.50	< 0.50	< 0.50	4.9	13	820	0.55 (DIPE)
	6/27/06	< 400	140	4.4	< 0.50	< 0.50	< 0.50	8.9	21	1,300	0.60 (DIPE)
	8/24/06	< 400	140	< 4.0	< 4.0	< 4.0	< 4.0	7.0	< 20	1,400	< 4.0
	11/20/06	< 150	< 50	2.5	< 1.5	< 1.5	< 1.5	3.3	10	750	< 1.5
	2/5/07	170	< 50	3	< 0.90	< 0.90	< 0.90	2.4	6.5	440	< 0.90
ESL		500	640	46	130	290	13	NE	NE	1,800	Varies

Notes:

Data prior to August 2004 is based on a table compiled by AARS - ASE has not checked results against original laboratory reports.

ESL = Environmental screening levels presented in the "Screening For Environmental Concerns at Sites With Contaminated Soil and Groundwater (July 2003)" document prepared by the California Regional Water Quality Control Board, San Francisco Bay Region.

 $\label{thm:constraints} \mbox{Non-detectable concentrations noted by the less than sign (<) followed by the laboratory detection limit.}$

NE indicates that no ESL has been established for this compound.

^{*} Does not match diesel pattern

^{**} Confirmed by GC/MS method 8260



APPENDIX A

CAP Approval Letter from the ACHCSA

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

(510) 567-6700 FAX (510) 337-9335

November 8, 2006

Dr. Joginder Sikand 1300 Ptarmigan Drive #1 Walnut Creek, CA 94595

Mr. Anis Rahman Albany Hill Mini Mart 800 San Pablo Avenue Albany, CA 94706

Subject: Fuel Leak Case No. RO0000262, Albany Hill Mini Mart, 800 San Pablo Avenue, Albany, CA

Dear Dr. Sikand and Mr. Rahman:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site, including the documents entitled, "Response to Comments," dated September 13, 2006 and "Work Plan for Additional Soil and Groundwater Assessment," dated September 20, 2006 and submitted to ACEH on November 6, 2006. The "Work Plan for Additional Soil and Groundwater Assessment," dated September 20, 2006 proposes soil and groundwater sampling from one soil boring north of the site. The proposed scope of work to advance one soil boring off-site at 736 San Pablo Avenue is approved as discussed in technical comment 1 below. The "Response to Comments," presents a rough estimate of the mass of TPHg in the vadose zone and also presents a recommendation to implement ozone sparging at the site. Please see technical comment 2 below regarding the recommendation to implement ozone sparging for site remediation.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- Additional Investigation. We concur with the proposed scope of work to advance one soil boring north of the site and collect soil and groundwater samples from the boring for analyses. Please present results from the soil boring in the report requested below.
- Ozone Sparging. The "Response to Comments," dated September 13, 2006 and a previous report entitled "Report of Soil and Groundwater Assessment and Corrective Action Plan," dated June 28, 2006 both conclude that the site is suitable for ozone sparging and recommend designing an ozone sparging system for groundwater remediation at the site. Please present plans for the installation of an ozone sparging system in the Work Plan requested below.

Dr. Joginder Sikand Mr. Anis Rahman November 8, 2006 Page 2

- 3. Request for Identification of Adjacent Property Owners. Public participation is a requirement for the Corrective Action Plan process. In order to provide notification to potentially affected members of the public, please provide a list of all properties, which are currently or may in the future be directly or indirectly affected by the petroleum release from your site or the proposed corrective action. The list is to identify the properties by street address, parcel number, and property owner name. Please also provide a map showing the street address for each of the listed properties. A current mailing address is to be included for each property owner. ACEH will notify each of the property owners on the list of the proposed corrective action.
- 4. Geotracker EDF Submittals. A review of the SWRCB Geotracker website indicates that no data or reports have been submitted to Geotracker for your site since 2003. Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collected groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all analytical data (collected on or after September 1, 2001) and a copy, in PDF format, of all reports prepared after July 1, 2005.

TECHNICAL REPORT REQUEST

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

- January 26, 2007 Work Plan for Ozone Sparging System
- February 28, 2007 Soil Boring Results 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

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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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.

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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

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Sunil Ramdass SWRCB Cleanup Fund 1001 I Street, 17th floor Sacramento, CA 95814-2828

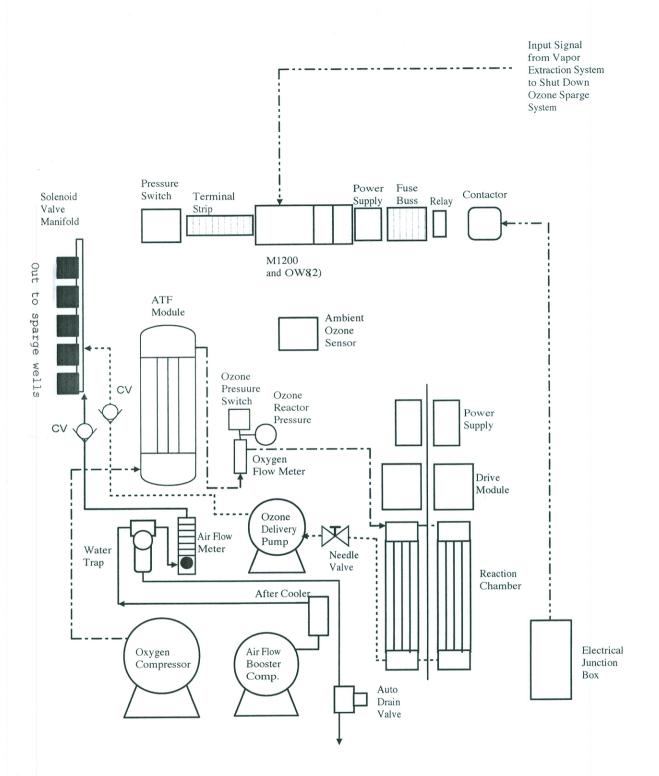
> Robert Kitay Aqua Science Engineers, Inc. 208 W. El Pintado Danville, CA 94526

Donna Drogos, ACEH Jerry Wickham, ACEH File



APPENDIX B

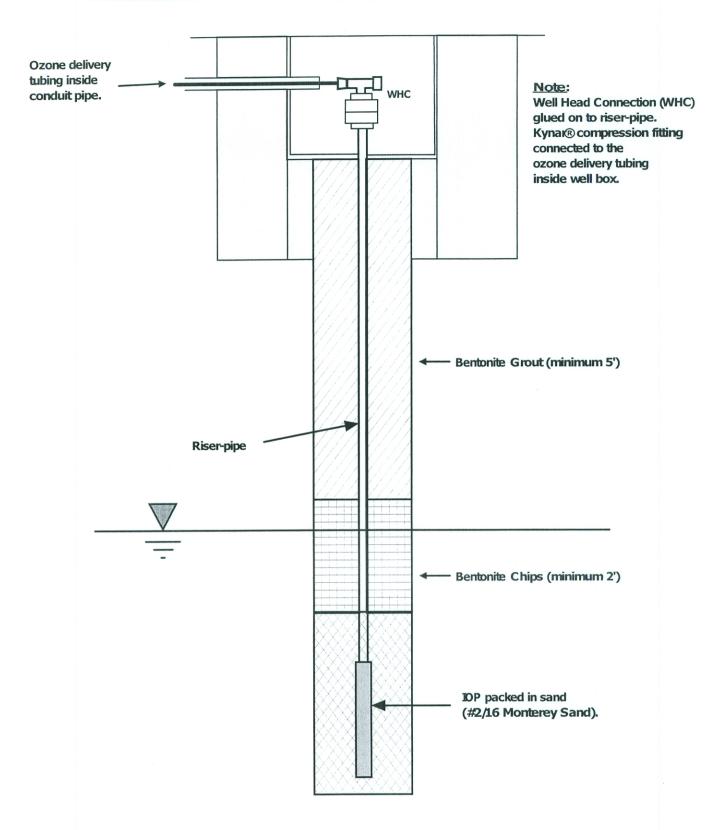
Remediation System Diagrams



H2O Engineering, Inc. 265 Prado Road, Suite#1 San Luis Obispo, CA 93401 Phone: 805-547-0303 Fax: 805-547-0113 www.h2oengineering.com



In Situ Oxidation Point (IOP) Sparge Well Installation Diagram



^{*}This is a typical sparge well installation. Please check your state and local requirements for an engineering standard sparge well construction. California Department of Water Resources Bulletin No.74-81 and 74-90: "Water Well Standards: State of California"

H₂O Engineering, Inc 265 Prado Road, Suite #1 San Luis Obispo, CA 93401 805-547-0303 805-547-0113 Fax www.h2oengineering.com



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