Linda S. Adams
Acting Secretary for
Environmental Protection

State Water Resources Control Board

Division of Water Quality

1001 I Street, Sacramento, California 95814 ♦ (916) 341-5455
Mailing Address: P.O. Box 2231, Sacramento, California 95812
FAX (916) 341-5808 ♦ Internet Address: http://www.waterboards.ca.gov

Edmund G. Brown Jr.
Governor

JAN 2 0 2011

Mr. Ariu Levi, Director
Alameda County Environmental Health
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA 94502-6577

Dear Mr. Levi:

PETITION FOR CLOSURE REVIEW OF UNDERGROUND STORAGE TANK CASE, KAWAHARA NURSERY, 16550 ASHLAND AVENUE, SAN LORENZO, ALAMEDA COUNTY, DWQP - 0161, GEOTRACKER ID #T0600101605, CUF #9201, SAN FRANCISCO BAY RWQCB #01-1734, ALAMEDA COUNTY LOP #RO 0000291

Any underground storage tank (UST) owner, operator, or other responsible party, who has a UST case and who believes that the corrective action plan for the UST case has been satisfactorily implemented, but where closure has not been granted, may petition the State Water Resources Control Board (State Water Board) for a review of the case. (Health and Safety Code § 25296.40, subd. (a)(1).) The State Water Board received a petition seeking review of the Lead Regulatory Agency's (Lead Agency) decision denying UST case closure. (A copy of the petition is enclosed.)

The petitioner did not, however, obtain a closure-denial letter from the lead agency prior to submitting a request to the State Water Board for review of a UST case. It is our understanding that the petitioner submitted a request for closure and the Lead Agency did not respond within 60 days, the inaction of the Lead Agency will be deemed to constitute a denial of the request. (Cal. Code Regs., tit.23, § 2814.6, subd.(b).) (A copy of the petition including a request for closure is enclosed for your reference.)

In accordance with section 2814.7 of Chapter 18 of Title 23 of the California Code of Regulations, your agency is required to comply with the following:

1. The State Water Board must receive from you a list of any persons known by your agency to have an interest in the subject matter of the petition within 10 days of the date of this letter.

2. The State Water Board must receive a copy of the complete record relative to the case within 20 days of the date of this letter. The record includes but is not limited to all reports, correspondence, field notes, permits, notices and any other record pertaining to the UST case.

3. The State Water Board must receive a copy of the lead agency's position on UST case closure and provide the bases for the Lead Agency's position within 20 days of the date of this letter.

After receiving the Lead Agency's response, the SWRCB will proceed with the review of the petition if necessary.

The deadlines for filing a position on UST case closure may be extended by the State Water Board.

If you have any questions, please call George Lockwood at (916) 341-5752 or glockwood@waterboards.ca.gov.

Sincerely,

Kevin L. Graves, Manager
Underground Storage Tank Program

Enclosure (1) Kawahara Petition

cc: (w/o enclosure)

[via email only]

Mr. Frank Goldman
Environmental Forensics & Hydrogeological Consulting
PO BOX 224, Roseville, CA 95661
(fjgoldmanchg@yahoo.com)

Ms. Donna Drogos
Alameda County Environmental Health
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA 94502-6577
(Donna.drogos@acgov.org)

Ms. Barbara Jakub
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(Barbara.jakub@acgov.org)

Ms. Cherie McCaulou
San Francisco Bay RWQCB
1515 Clay Street, Suite 1400
Oakland, CA 94612
(cmccaulou@waterboards.ca.gov)

Ms. Mary Rose Cassa
San Francisco Bay RWQCB
1515 Clay Street, Suite 1400
Oakland, CA 94612
(Mcassa@waterboards.ca.gov)

Mr. Bob Trommer, SWRCB, UST Cleanup Fund
(btrommer@waterboards.ca.gov)

Mr. George Lockwood, SWRCB, UST Petitions Unit
(glockwood@waterboards.ca.gov)

November 10, 2010

George Lockwood
SWRCB
P.O. Box 2231
Sacramento, CA 95812

SUBJECT: **PETITION TO CLOSE THE FORMER UNDERGROUND STORAGE TANK SITE AT** (Kawahara Nursery, 16550 Ashland Ave., San Lorenzo, CA)

Mr. Lockwood,

Frank Goldman, my environmental consultant, contends that my site should be closed. I have not received any response to the Site Closure Summary Report submitted 60 days ago to Alameda County Environmental Health. I have attached my consultant's technical report requesting closure. My consultant says that he has demonstrated that natural attenuation is occurring at my site, that the plume has been defined, and that the low levels of contamination left in the ground are not a threat to human health, drinking water and the environment. I am not sure why Alameda County has not responded and I don't believe any concurrence regarding my request for UST site closure is forthcoming. Numerous subsurface investigations have been performed at my site at great expense and my site has been open for over 17 years and the discharge originally occurred before 1954. Please let me know if what I have provided is enough for the SWRCB Petition Unit staff to make a decision.

Thank you,

John T. Kawahara

John Kawahara
Kawahara Nursery, Inc.
689 Burnett Ave.
Morgan Hill, CA 95037

PHONE: (408) 640-4289
JKawahara@KawaharaNurseries.com

MAIN ISSUES RELATED TO UST SITE CLOSURE FOR THIS SITE

The subject site is located within the East Bay Plain Groundwater Basin in San Lorenzo, CA (**See Figure 1 – Site Location Map**). The site is a nursery that is located at the southeast corner of Ano street and Ashland avenue (**See Figure 2 – Map of Site**).

This UST site has been open for over seventeen (17) years and the discharge at issue occurred prior to 1954.

The site has had two underground storage tanks used on the property. There was a 5,000 gallon diesel UST removed on December 01, 1993 (See Attachment A – Tank Pull data) from the south central portion of the site and a 1,000 gallon gasoline UST reported by the property owner to have been removed in 1954 immediately after purchase of the property (See Attachment B - Remedial Action Plan, September 10, 2001, Blymer Engineers, page 2) & (See Attachment C – County hand written note, September 01, 1993). Due to the presence of low levels of diesel and the absence of benzene, Alameda County Environmental Health approved the removal of groundwater monitor wells MW-1 and MW-2 located adjacent to the former diesel UST (See Attachment D – County Letter, June 06, 1997). So, the diesel contamination associated with the former 5,000 gallon diesel UST is no longer an impediment to site closure.

The 1,000 gasoline UST excavation area has been investigated through soil sampling, soil gas investigation, monitor well installation, and groundwater monitoring. During the installation of groundwater monitor well MW-3, a soil sample collected at a depth of 15 feet bgs identified benzene in soil at 0.200 ppm.

As a result, the County required additional subsurface investigation to define the gasoline constituents identified (See Attachment E – County Letter, May 18, 1994).

ESTIMATED LOCATION OF THE FORMER 1,000 GALLON UST

Since there is no direct formal documentation that the 1,000 gallon UST existed or was removed from the site prior to 1954, the County approved a geophysical survey proposed by Blymer Engineers to locate the tank (See Attachment F – See July 14, 1995 workplan proposing geophysical locating and December 26, 1995 County letter approval). The geophysical survey was inconclusive regarding the existence of the former 1,000 gallon UST, however, Blymer Engineers stated that the gasoline related constituents identified were limited in extent where the magnetic anomalies were defined (See Attachment G – See March 08, 2004 Modified RAP).

Soil samples collected for gasoline related constituents from the soil borings excavated for MW-3 and MW-5, as well as soil boring SB-3 thru SB-9 identified BTEX constituents in a pattern which is typically representative of a gasoline UST. Given that a typical 1,000 gasoline cylindrical UST measures about four (4) feet in diameter by ten (10) feet in length, and that they are typically buried between three to 5 feet bgs, the bottom of this UST removed in 1954 would be at approximately eight (8) feet bgs. It isn't just a coincidence that the two soil borings, MW-3 and SB-4, located closest to the suspected UST location identified the highest documented concentrations for benzene in soil at of 0.200 ppm and 0.870 ppm, at depths of 15 feet bgs, respectively (**See Figure 3 – Map of BTEX in Soil**). Soil samples collected at depths of ten (10) feet or less from the

residual benzene adsorbed to soil particles in the smear zone are no longer contributing to the dissolved constituents in the groundwater.

A letter from the UST Cleanup Fund, concurs with this assertion that natural attenuation of benzene in MW-3 is occurring (See Attachment I – See December 08, 2008 for UST Cleanup Fund Letter acknowledging Natural Attenuation).

Natural attenuation parameters were measured in groundwater monitor wells from 1999 to 2003 as reported in the Fall 2008 Semiannual Groundwater Monitoring Report, December 05, 2008, by Blymer Engineers, however, no evaluation of the data as related to obtaining site closure was reported.

THREAT TO THE BENEFICIAL USES OF GROUNDWATER & SURFACE WATER

There are two surface water bodies which were identified near the subject site (**See Figure 1 – Map of Distances to Surface Water Bodies**). Estudillo Channel is located about 4,300 feet down gradient of the site and appears to be lined with concrete. San Lorenzo Creek is located approximately 800 feet up from, and cross gradient to, the site. Both surface water bodies are located too far away to be impacted by residual gasoline constituents associated with the subject site.

The onsite irrigation supply well does not appear to be hydraulically connected to the shallow groundwater impacted at the subject site. A letter from the County acknowledged this to be the case (See Attachment J – See May 18 1994 County letter stating that the supply well is not hydraulically connected to the shallow groundwater).

Available groundwater usage from the Kawahara water supply well is obtained from a depth below approximately 45 feet bgs. There are two clayey soil layers which lie above the water supply production zone (e.g. 3 to 25 feet bgs and 42 to 45 feet bgs obtained from a DWR Well Completion Report for this well) (**See Figure 4 – Map of Soil stratigraphy of supply well and adjacent soil borings**) & (See Attachment J – See Well Completion Report). Shallow groundwater was first encountered in soil borings SB-8 and SB-9 at a depth of 12 feet bgs. Below sandy permeable zone where water was first encountered is 2 ½ to 3 feet of less permeable clayey soils. Therefore, there is approximately 14½ feet (i.e. from 13½' to 25' and 42' to 45') of clayey soils between the bottom of the shallow aquifer and the top of the water supply aquifer in the vicinity of the Kawahara irrigation water supply well. This is sufficient to prevent the migration of the low levels of benzene identified to date from short circuiting a properly constructed water supply well.

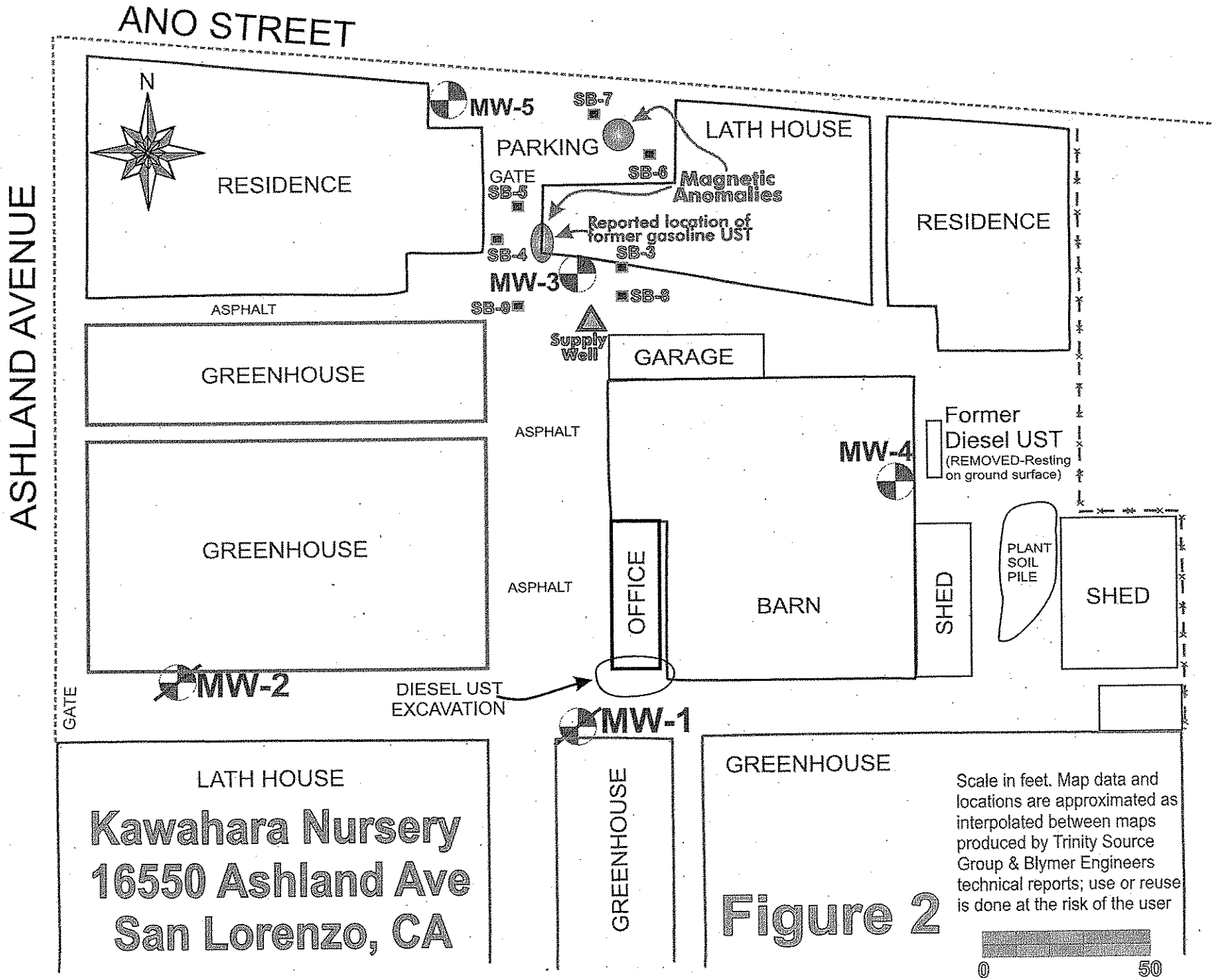
In a technical report produced for a nearby former UST site, it states that groundwater in the vicinity of the site has very limited beneficial uses (Attachment K – See April 17, 2009 Workplan for Investigation, by Sierra for the nearby New Performance site).

COMPARISON WITH SITE CLOSURES FOR NEARBY PROPERTIES

The former New Performance UST site located south of the subject site at 186 E. Lewelling Street, San Lorenzo, provides similar criteria for site closure as the Kawahara Nursery site (See Attachment L – SWRCB Closure Letter and Draft Summary). The New Performance site provides a detailed list of neighboring property owners who may be interested in the request for site closure for the Kawahara Nursery site.

LIMITATIONS

This report has been prepared in accordance with generally accepted environmental, geological and engineering practices. No warranty, either expressed or implied, is made as to the professional advice presented herein. The analyses, conclusions and recommendations contained in this report are based upon site conditions as they existed at the time of the investigation and they are subject to change. The conclusions presented in this report are professional opinions based solely upon visual observations of the site and vicinity, and interpretation of available information as described in this report. Franklin J. Goldman, recognizes that the limited scope of services performed in execution of this investigation may not be appropriate to satisfy the needs, or requirements of other state agencies, or of other users. Any use or reuse of this document or its findings, conclusions or recommendations presented herein, is done so at the sole risk of the said user.


ANO STREET
ASHLAND AVENUE
N
RESIDENCE
MW-5
SB-7
PARKING
LATH HOUSE
GATE
SB-5
SB-6
Magnetic Anomalies
Reported location of former gasoline UST
SB-4
SB-3
MW-3
SB-9
SB-3
ASPHALT
RESIDENCE
Supply Well
GARAGE
GREENHOUSE
ASPHALT
Former Diesel UST
(REMOVED-Resting on ground surface)
MW-4
GREENHOUSE
ASPHALT
OFFICE
BARN
SHED
PLANT SOIL PILE
SHED
MW-2
DIESEL UST EXCAVATION
MW-1
GATE
LATH HOUSE
GREENHOUSE
GREENHOUSE
Kawahara Nursery
16550 Ashland Ave
San Lorenzo, CA
Figure 2
Scale in feet. Map data and locations are approximated as interpolated between maps produced by Trinity Source Group & Blymer Engineers technical reports; use or reuse is done at the risk of the user
0
50

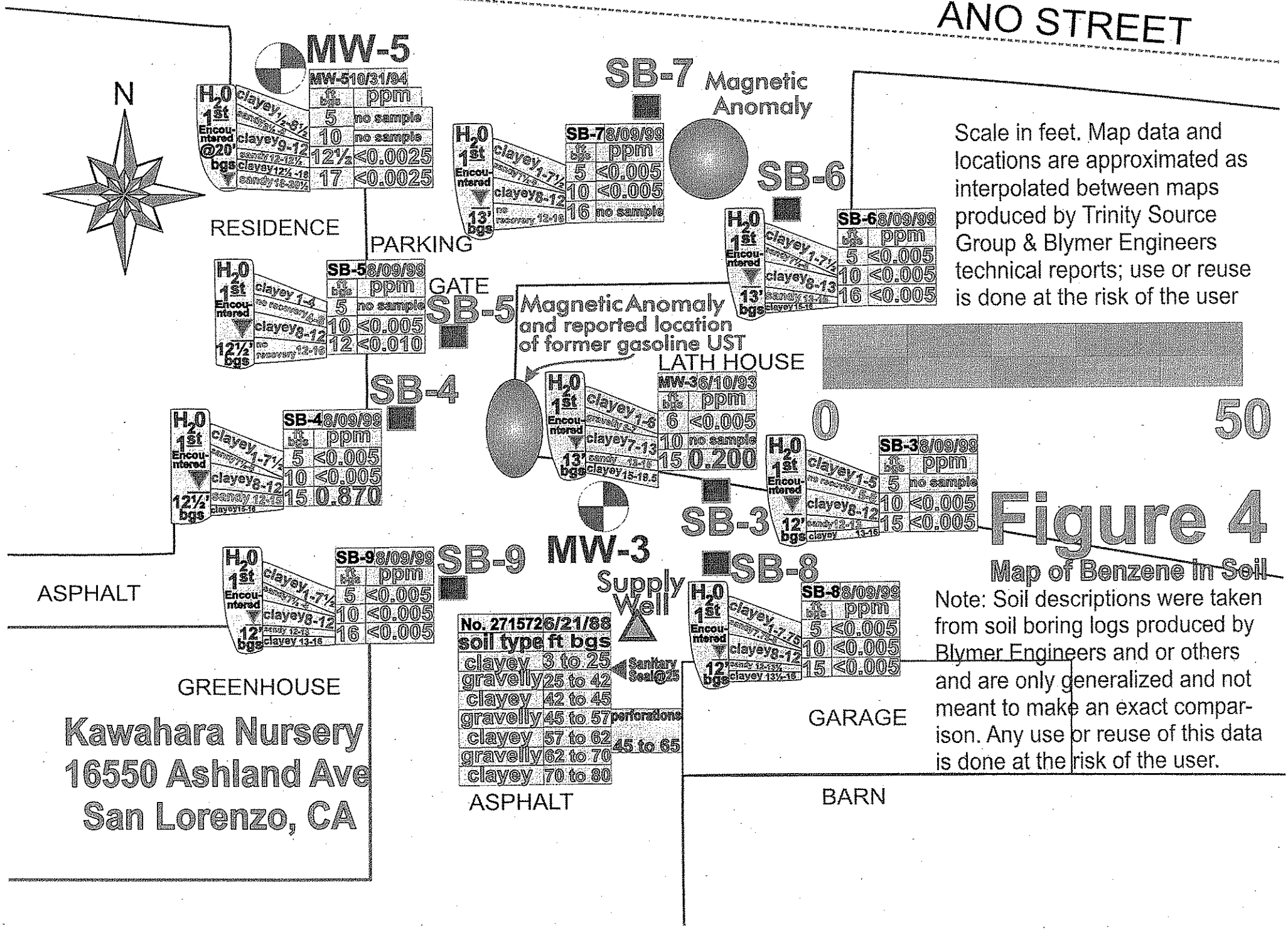

ANO STREET
N
MW-5
MW-5 10/31/94
ft bgs | ppm
5 | no sample
10 | no sample
12½ | <0.0025
17 | <0.0025
H2O 1st Encountered @20' bgs
clayey ½-8½
clayey 8-12
clayey 12½-18
RESIDENCE
PARKING
GATE
SB-7
Magnetic Anomaly
SB-7 8/09/99
ft bgs | ppm
5 | <0.005
10 | <0.005
16 | no sample
H2O 1st Encountered 13' bgs
clayey 1-7½
clayey 8-12
SB-6
SB-6 8/09/99
ft bgs | ppm
5 | <0.005
10 | <0.005
16 | <0.005
H2O 1st Encountered 13' bgs
clayey 1-7½
clayey 8-13
SB-5
SB-5 8/09/99
ft bgs | ppm
5 | no sample
10 | <0.005
12 | <0.010
H2O 1st Encountered 12½' bgs
clayey 1-4
clayey 8-12
Magnetic Anomaly and reported location of former gasoline UST
LATH HOUSE
SB-4
SB-4 8/09/99
ft bgs | ppm
5 | <0.005
10 | <0.005
15 | 0.870
H2O 1st Encountered 12½' bgs
clayey 1-7½
clayey 8-12
sandy 12-15
clayey 15-16
MW-3 6/10/93
ft bgs | ppm
6 | <0.005
10 | no sample
15 | 0.200
H2O 1st Encountered 13' bgs
clayey 1-6
clayey 7-13
sandy 13-15
clayey 15-18.5
SB-3
SB-3 8/09/99
ft bgs | ppm
5 | no sample
10 | <0.005
15 | <0.005
H2O 1st Encountered 12' bgs
clayey 1-5
clayey 8-12
sandy 12-13
clayey 13-15
0
50
Figure 4
Map of Benzene in Soil
SB-9
SB-9 8/09/99
ft bgs | ppm
5 | <0.005
10 | <0.005
16 | <0.005
H2O 1st Encountered 12' bgs
clayey 1-7½
clayey 8-12
sandy 12-13
clayey 13-16
MW-3
Supply Well
SB-8
SB-8 8/09/99
ft bgs | ppm
5 | <0.005
10 | <0.005
15 | <0.005
H2O 1st Encountered 12' bgs
clayey 1-7.5
clayey 8-12
sandy 12-13½
clayey 13½-16
ASPHALT
No. 2715726/21/88
soil type ft bgs
clayey 3 to 25
gravelly 25 to 42
clayey 42 to 45
gravelly 45 to 57
clayey 57 to 62
gravelly 62 to 70
clayey 70 to 80
Sanitary Seal@25
perforations 45 to 65
ASPHALT
GREENHOUSE
GARAGE
BARN
Kawahara Nursery
16550 Ashland Ave
San Lorenzo, CA
Scale in feet. Map data and locations are approximated as interpolated between maps produced by Trinity Source Group & Blymer Engineers technical reports; use or reuse is done at the risk of the user
Note: Soil descriptions were taken from soil boring logs produced by Blymer Engineers and or others and are only generalized and not meant to make an exact comparison. Any use or reuse of this data is done at the risk of the user.

Figure 6
Water Level Elevation in Feet AMSL for MW-3
Dissolved Benzene Concentration (ppb) at MW-3
Decreasing Dissolved Benzene Trend Line. Water quality objective estimated to be reached within four quarters
Concentration [ppb] of Dissolved Benzene
Groundwater Elevation in Feet AMSL
5,000
4,000
3,000
2,000
1,000
900
800
700
600
500
400
300
200
100
90
80
70
60
50
40
30
20
10
9
8
7
6
5
4
3
2
1
0
92.6 34.8
92.4 34.6
92.2 34.4
92.0 34.2
91.8 34.0
91.6 33.8
91.4 33.6
91.2 33.4
91.0 33.2
90.8 33.0
90.6 32.8
90.4 32.6
90.2 32.4
90.0 32.2
89.8 32.0
89.6 31.8
89.4 31.6
89.2 31.4
89.0
88.8
88.6
88.4
88.2
88.0
87.8
6/16/1993
3/28/1994
3/28/1994
11/8/1994
3/29/1995
6/7/1995
9/7/1995
3/4/1999
6/29/1999
11/15/1999
5/22/2000
8/16/2000
11/16/2000
2/21/2001
5/31/2001
11/28/2001
5/28/2002
11/14/2002
5/23/2003
11/24/2003
5/13/2004
11/23/2004
5/17/2005
11/16/2005
5/23/2006
11/15/2006
5/31/2007
11/28/2007
5/29/2008
11/19/2008
5/20/2009
11/5/2009
5/13/2010
Kawahara Nursery-16550 Ashland Ave., San Lorenzo, CA

TANK PROTECT ENGINEERING
Of Northern California, Inc.

(510) 429-8088
(800) 523-8088
FAX (510) 429-8089

FROM: TANK PROTECT ENGINEERING

DATE: May 12, 1995

TO: Alameda County

ATTN: Amy Leach

RE.: Information Request for Kawahara Nursery

NO. OF PAGES: 7
(Include cover sheet)

If all pages are not received please notify sender.

MESSAGE:

922192

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIF

San Francisco, CA. 94107 CAD004771158

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Container No.	12. Container Type	13. Total Quantity	14. Unit Wt/Vol
RESIDUE DIESEL TANK NON-RCRA HAZARDOUS WASTE SOLID	001	TP	05000	P
b.				
c.				
d.				

[redacted]

15. Special Handling Instructions and Additional Information
JOB #11798
24 Hr. Emergency Contact: H & H #(415) 543-4835
APPROPRIATE PROTECTIVE CLOTHING AND RESPIRATOR

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of the consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable federal, state and international laws.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
ON BEHALF OF S.KAWAHARA NURSERY	J. Kawahara	12	01	92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials				
Printed/Typed Name	Signature	Month	Day	Year
JAMES R. MORGAN	James R. Morgan	12	01	92
18. Transporter 2 Acknowledgement of Receipt of Materials				
Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name	Signature	Month	Day	Year
[illegible]	[illegible]	12	01	92

DO NOT WRITE BELOW THIS LINE.

White: TSDF SENDS THIS COPY TO DTSC WITHIN 30 DAYS.
Yellow: P.O. Box 3000, Sacramento, CA 95812

DTSC 8022A (12/91)
EPA 8700-22

TANK PROTECT ENGINEERING
2821 WHIPPLE ROAD
UNION CITY, CA 94587
(415)429-8088
(800)523-9080
FAX(415)429-8089

2727

LAB: TAL
TURNAROUND: Normal / 10 days
P.O. #: 0533

PAGE 1 OF 1

CHAIN OF CUSTODY

PROJECT NO.	SITE NAME & ADDRESS
243A120192	Kankakee Nursery Inc., San Lorenzo, Ca 94580

SAMPLER NAME, ADDRESS AND TELEPHONE NUMBER
Ahmad Shah Tank Protect Engineering
2821 WHIPPLE ROAD, UNION CITY, CA 94587 (415) 429-8088

LO NO.	DATE	TIME	SOIL	WATER	SAMPLING LOCATION	(1) TYPE OF CONTAINER	ANALYSES REQUESTED: TOTAL LIGHT HC	AROMATIC HC (BTX)	TOTAL HEAVY HC	OIL & GREASE	VOC SCAN (624's)	OTHER	REMARKS
SE	12/1	3:18	✓		SE @ 8.5' from Top	Brass Tubes	✓	✓					(Hold the Samples till further notice)
SW	12/1	3:38	✓		SW @ 9' from Top		✓	✓					
ST	12/1	3:35	✓		ST @ 2' from Top		✓	✓					Samples initated 12/7/92 for these analyses. per Ahmad of Tank Protect. 12/7/92, 3:25 pm JCL.
STA	12/1	3:40	✓		ST-2 @ 2' from Top	↓	✓	✓					

Relinquished by : (Signature)	Date / Time	Received by : (Signature)	Relinquished by : (Signature)	Date / Time	Received by : (Signature)
Amadsen	12/8/92 11:30 am	Lori Miller	Lori Miller	12/2/92 1:35	Nasir E Garcia
Nasir E Garcia	12/2/92 1:35				

Relinquished by : (Signature)	Date / Time	Received for Laboratory by: [Signature]	Date / Time	Remarks
		Tahwan Lankford	12/2/92 1:35 pm	P/U Soil (1) 8-Tec Tec Y-B On hold JCL

DATE: 12-1-1992

Trace Analysis Laboratory, Inc.
3423 Investment Boulevard, #8 • Hayward, California 94545
Telephone (510) 783-6860
Facsimile (510) 783-1512

TAL

December 21, 1992

Marc Zomorodi
Tank Protect Engineering
2821 Whipple Road
Union City, CA 94587

Dear Mr. Zomorodi:

Trace Analysis Laboratory received four soil samples on December 2, 1992 for your Project No. 243A-120192, Kawahara Nursery, Inc. (our custody log number 2727).

These samples were analyzed for Total Petroleum Hydrocarbons as Diesel and Benzene, Toluene, Ethylbenzene and Xylenes. Our analytical report and the completed chain of custody form are enclosed for your review.

Trace Analysis Laboratory is certified under the California Environmental Laboratory Accreditation Program. Our certification number is 1199.

If you should have any questions or require additional information, please call me.

Sincerely yours,

Jennifer Pekol
Project Specialist

Enclosures

Attachment B

1.0 Background

1.1 Previous Work

1.1.1 Underground Storage Tank Removal

On December 1, 1992, one steel 5,000-gallon underground storage tank (UST) was removed from the property owned by Kawahara Nursery, located at 16550 Ashland Avenue, San Lorenzo, California, (Figure 1). The UST, used to store diesel, was reported to be in good condition at the time of removal with no visible evidence of holes. However, soil samples collected from the UST excavation contained Total Petroleum Hydrocarbons (TPH) as diesel, suggesting that a release had occurred. The results of the UST closure were described in the *Underground Storage Tank Closure Report*, prepared by Tank Protect Engineering.

According to information obtained from Kawahara Nursery, a 1,000-gallon gasoline UST was previously located in the vicinity of the lath house on the north side of the property (Figure 2). The UST was reportedly removed from the site shortly after Kawahara Nursery occupied the property in 1954.

1.1.2 Phase I Site Investigation

In a letter dated January 27, 1993, the ACHCSA requested that a preliminary subsurface investigation be completed to ascertain the extent of soil and groundwater contamination at the site. On June 10, 1993, Blymyer Engineers supervised the installation of three groundwater monitoring wells (MW-1, MW-2, and MW-3) and one soil bore (SB-1). Minor concentrations of petroleum hydrocarbons were detected in the soil samples collected from soil bores MW-1 and MW-2, and higher concentrations were detected in the samples collected near the water-bearing zone in soil bore MW-3. The groundwater sample collected from monitoring well MW-3, located adjacent to an on-site irrigation well, contained TPH as gasoline and benzene, toluene, ethylbenzene, and xylenes (BTEX).

1.1.3 Phase II Site Investigation

In response to Blymyer Engineers' *Preliminary Site Assessment, Phase I Subsurface Investigation* report and *Subsurface Investigation Status Report*, the ACHCSA requested full delineation of the extent of petroleum hydrocarbons in groundwater at the site and in the soil adjacent to the diesel UST excavation. In 1994, Blymyer Engineers conducted a second phase of investigation at the site consisting of:

- A review of records at the ACHCSA and the Regional Water Quality Control Board to determine if any toxic chemical or fuel leaks reported within a ¼-mile radius may have impacted the site

Phone Conversation 9/1/93

Jean Kawahara
& Juliet Shin
RE: Kawahara Nursery, San Lorenzo

Ms. Kawahara stated that there was a gasoline UST at the site before the diesel UST was installed, around 40 years ago. I explained the next required phase of work and supplied her w/ some info on the Cleanup Fund.

Attachment D

Attachment E

Per my conversation with Laurie Buckman, Blymyer, on May 18, 1994, the stockpiled soil will be disposed of off site. Please be reminded to submit the documentation for the soil disposal after hauling off site.

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

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Laurie A. Buckman
Blymyer Engineers, Inc.
1829 Clement Ave.
Alameda, CA 94501-1395

Edgar Howell-File(JS)

BLYMYER
ENGINEERS, INC.

July 14, 1995
BEI Job No. 94015

Ms. Jean Kawahara
Kawahara Nursery, Inc.
16550 Ashland Avenue
San Lorenzo, CA 94505

Subject: **Proposal for Additional Subsurface Investigation**
Kawahara Nursery
16550 Ashland Avenue
San Lorenzo, California

Dear Mr. Kawahara:

Blymyer Engineers, Inc. is pleased to submit this proposal to conduct additional subsurface investigation activities at the above referenced site. Blymyer Engineers completed a *Preliminary Site Assessment Phase I Subsurface Investigation* report, dated July 28, 1993 and a *Subsurface Investigation Status Report*, dated April 29, 1994. The completed reports detailed subsurface investigation activities conducted at the site following the removal of one 5,000-gallon diesel underground storage tank (UST) on December 1, 1992. The investigations completed at the site consisted of the installation of three groundwater monitoring wells (MW- 1 through MW-3), soil sample collection from the soil bores prior to well installation, collection of groundwater samples from the wells and the on-site irrigation well, and a thorough research of regulatory files relating to unauthorized releases of petroleum hydrocarbons in the vicinity of the site. The analytical results of the collected soil and groundwater samples indicated concentrations of petroleum hydrocarbons in the soil and groundwater at the site.

Blymyer Engineers also completed a *Subsurface Investigation Letter Report*, dated December 16, 1994, which detailed the results of a soil gas survey and the installation of two additional groundwater monitoring wells (MW-4 and MW-5) at the site. The results of the investigation indicated detectable concentrations of petroleum hydrocarbons in soil vapors and groundwater (MW-3) in the vicinity of the lath house located near the northwestern property line. Petroleum hydrocarbons were not detected in concentrations above analytical method reporting limits in the monitoring wells installed approximately 60 feet downgradient (MW-5) and 65 feet upgradient (MW-4) of the lath house area.

Blymyer Engineers has completed two consecutive quarters of groundwater sampling at the site which have indicated concentrations of petroleum hydrocarbons only slightly above analytical method reporting limits in monitoring well MW-5 installed downgradient of the lath house.

In a very recent discussions with you, it was revealed that there is a possibility that a gasoline UST may have been formerly located in the vicinity of the lath house. Records pertaining to the

1829 CLEMENT AVENUE ALAMEDA, CALIFORNIA 94501-1395
PHONE 510-521-3773 FAX 510-865-2594

excavation, which could isolate the source of the subsurface petroleum hydrocarbon contamination at the site.

5.0 Drill approximately six Geoprobe® soil bores

Using a Geoprobe® sampling system, approximatly six soil bores will be advanced to approximately 20 feet below grade surface (bgs) in the vicinity of the lath house, or areas of suspected fill material noted during the GPR survey.

6.0 Field screen soil samples

Soil samples will be collected from each soil bore at encountered changes in soil lithology or at a minimum of 5-foot intervals, for field screening using a photoionization detector (PID) and for lithologic description.

7.0 Collect soil and grab groundwater samples from the soil bores for laboratory analysis

Two soil samples and one grab groundwater sample will be collected from each soil bore in accordance with Blymyer Engineers' *Standard Operating Procedure No. 4, Soil and Grab Groundwater Sampling Using Hydraulically-Driven Sampling Equipment, Revision No. 1.* Soil samples will be collected from the zone directly above the vadose/groundwater interface and from the interval displaying the highest field PID reading. The soil and grab groundwater samples will be submitted to a California-certified laboratory for analysis of Total Petroleum Hydrocarbons (TPH) as gasoline and TPH as diesel by modified EPA Method 8015 and benzene, toluene, ethylbenzene, and total xylenes (BTEX) by EPA Method 8020.

8.0 Prepare a final report

A final letter report will be prepared which will document all work performed, including a detailed summary of the soil and groundwater analytical data, a scaled map of the soil bore location with respect to existing features of the site, groundwater and soil contaminant concentration maps, soil bore logs including a detailed description of the geologic and hydrogeologic conditions at the site, investigation conclusions, and recommendations for future work at the site.

9.0 Drum soil cuttings and well development water

All soil cuttings will be stored on-site in labeled 5-gallon buckets and decontamination

Soil and Groundwater Investigations in the Vicinity of MW-3

Elevated levels of TPH as gasoline and BTEX continue to be detected in groundwater samples collected from monitoring MW-3. You indicated during our meeting on October 18, 1995, that a 1,000 gallon gasoline underground storage tank (UST) was located next to monitoring well MW-3 but was removed some time ago. If you are able to pinpoint the exact location of this former tank, then the proposed geophysical survey could possibly be eliminated from the proposed work plan for delineating the extent of soil and groundwater contamination in the vicinity of monitoring well MW-3.

This office concurs with Blymyer's proposal to use Geoprobe to collect soil and groundwater samples to assist in delineating the extent of soil and groundwater contamination in the northwest corner of the subject property. Information obtained from the Geoprobe study will also assist in determining if removal of contaminated soil is appropriate and/or proper location(s) for additional monitoring well(s).

Please submit to this office a final draft of the required work plan for delineating the extent of soil and groundwater contamination in the vicinity monitoring well MW-3 (location of the former gasoline UST) no later than February 1, 1996.

If you have questions or need additional information, please call me at (510)567-6755.

Sincerely,

Amy Leech
Hazardous Materials Specialist

ATTACHMENT

c: Attn: Laurie Buckman w/attachments
Blymyer Engineers, Inc.
1829 Clement Ave
Alameda CA 94501-1395

Gordon Coleman-File(ALL)

RO-291

BLYMYER
ENGINEERS, INC.

March 8, 2004
BEI Job No. 94015

Ms. Eva Chu
Alameda County Health Care Services Agency
Environmental Protection Division
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Subject: **Modification of Remedial Action Plan**
Kawahara Nursery
16550 Ashland Avenue
San Lorenzo, California
Site # 4403

Dear Ms. Chu:

As previously discussed, Kawahara Nursery has identified investigation of, and likely removal of, the suspect magnetic anomalies and any impacted soil above remedial goals as the remedial option of choice at the subject site (Figures 1 and 2). It has been surmised that the magnetic anomalies may be, or may have been related to, underground storage tank(s) (USTs). It is also possible that the anomalies are simply fill soils associated with excavations of unknown origins. Selection of the remedial actions was based upon the apparent, relatively limited extent of petroleum hydrocarbon contamination in soil in the vicinity of the magnetic anomalies, and if related to a former fueling system, the likely abandonment of the system at a point in the past. As previously proposed, removal of soil present above concentrations considered unacceptable relative to human health risks was planned. At the time of the initial RAP (September 10, 2001; Blymyer Engineers), these remedial goals, or Site Specific Target Levels (SSTLs), were yet to be defined by a health risk assessment. Since that time an *ASTM RBCA Health Risk Assessment* has been conducted (October 11, 2002, Blymyer Engineers), which defined the remedial goals for petroleum hydrocarbons in soil and groundwater at the site. However, as we have previously discussed, with the promulgation of the San Francisco Bay Regional Water Qaulity Control Board's (RWQCB) Environmental Screening Levels (revised September 2003), lower nuisance concentrations for petroleum hydrocarbons were established, and the Alameda County Health Care Services Agency (ACHCSA) adopted a policy that requires these nuisance concentrations be observed in remedial actions.

This change in policy reopens the need for remedial action at the former southern diesel UST (Figure 3). The nuisance concentration goal for Total Petroleum Hydrocarbons (TPH) as diesel is 100 mg/kg in locations where groundwater is considered to be a potential drinking water resource. The confirmation soil sample (sample SE) collected on the eastern edge of the UST excavation yielded a concentration of 5,000 milligrams per kilogram (mg/kg) of TPH as diesel and 1.8 mg/kg total xylenes (Table I). Soil bore SB-1 detected 130 mg/kg of TPH as diesel and 4.1 mg/kg TPH as gasoline at a depth of 17 feet below grade surface (bgs). No other contaminants were detected at these locations. Due to the elevated concentration of diesel present in soil sample SE, the lack of a significant zone of contaminated soil in proximity to the dispenser documented by bore SB-1, and the lack of sheen on groundwater encountered in bore SB-1, it is suspected that the concentration of

RE Shannon to 6/7/99

FACSIMILE MEMORANDUM SHEET

BLYMYER ENGINEERS, INC.

Date: June 14, 1999

Job No.: 94015

Fax No.: 337-9335

[redacted]

6 pages

TO: Amir Gholami
Alameda Co. Health Care Services

Subject: Kawahara Nursery, San Lorenzo

Amir-
Thank you for the faxed copy of your letter. [redacted] Before I respond to your letter formally, I need to clarify a few things regarding the site:

1) There is only one KNOWN former UST location (near MW-1). The diesel UST was removed and stored above ground next to the barn. The UST is no longer stored there, [redacted]

2) [redacted] in the vicinity of the known UST [redacted] showing soil concentrations [redacted]

2) The [redacted] An underground utility is immediately south of the suspected UST, and the east side of it is underneath the lath house (would require removing the structure to drill there). We believe that the downgradient perimeter locations proposed would provide adequate information regarding soil and groundwater concentrations resulting from a leaking UST at the location of the anomaly.

3) [redacted] are proposed approximately 3-4 feet from the magnetic anomaly north of the lath house (in [redacted] respectively- see Figure 4).

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

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

StId 4403/lop
June 6, 1997

Mr. and Mrs. Kawahara
Kawahara Nursery
16550 Ashland Ave
San Lorenzo CA 94580

Subject: Investigations at Kawahara Nursery located at 16550 Ashland Ave., San Lorenzo CA

Dear Mr. and Mrs. Kawahara:

This office has completed a review of Blymyer Engineers' *Workplan for Additional Site Characterization and Site Risk Classification*, dated June 3, 1997, concerning the subject. This workplan proposes to investigate soil and groundwater conditions in the vicinity of monitoring well MW-3 and in the location of a former gasoline underground storage tank via a geophysical survey and GeoProbe® investigation; complete groundwater monitoring and sampling for monitoring wells MW-3 through MW-5; complete an evaluation of risk; and destroy monitoring wells MW-1 and MW-2. This workplan is acceptable to this office with the following comments/additions:

1. Soil and groundwater samples should be collected downgradient of monitoring well MW-3 adjacent to the residential home. This data can be used when evaluating residential exposure scenarios for risk.

2. The minimum analyses for the background soil sample should include fraction of organic carbon (foc), soil bulk density, soil moisture content, and soil porosity.

3. Per my conversation with Laurie Buckman on June 6, 1997, in addition to soil samples, "grab" groundwater samples will also be collected from all GeoProbe® borings.

4. It would be acceptable to this office if monitoring wells MW-1 and MW-2 were decommissioned now or in the future after this site qualifies for site closure. In any event, this office concurs that groundwater samples will no longer need to be collected from MW-1 and MW-2.

5. [redacted]

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

Sincerely,

Amy Leech
Hazardous Materials Specialist

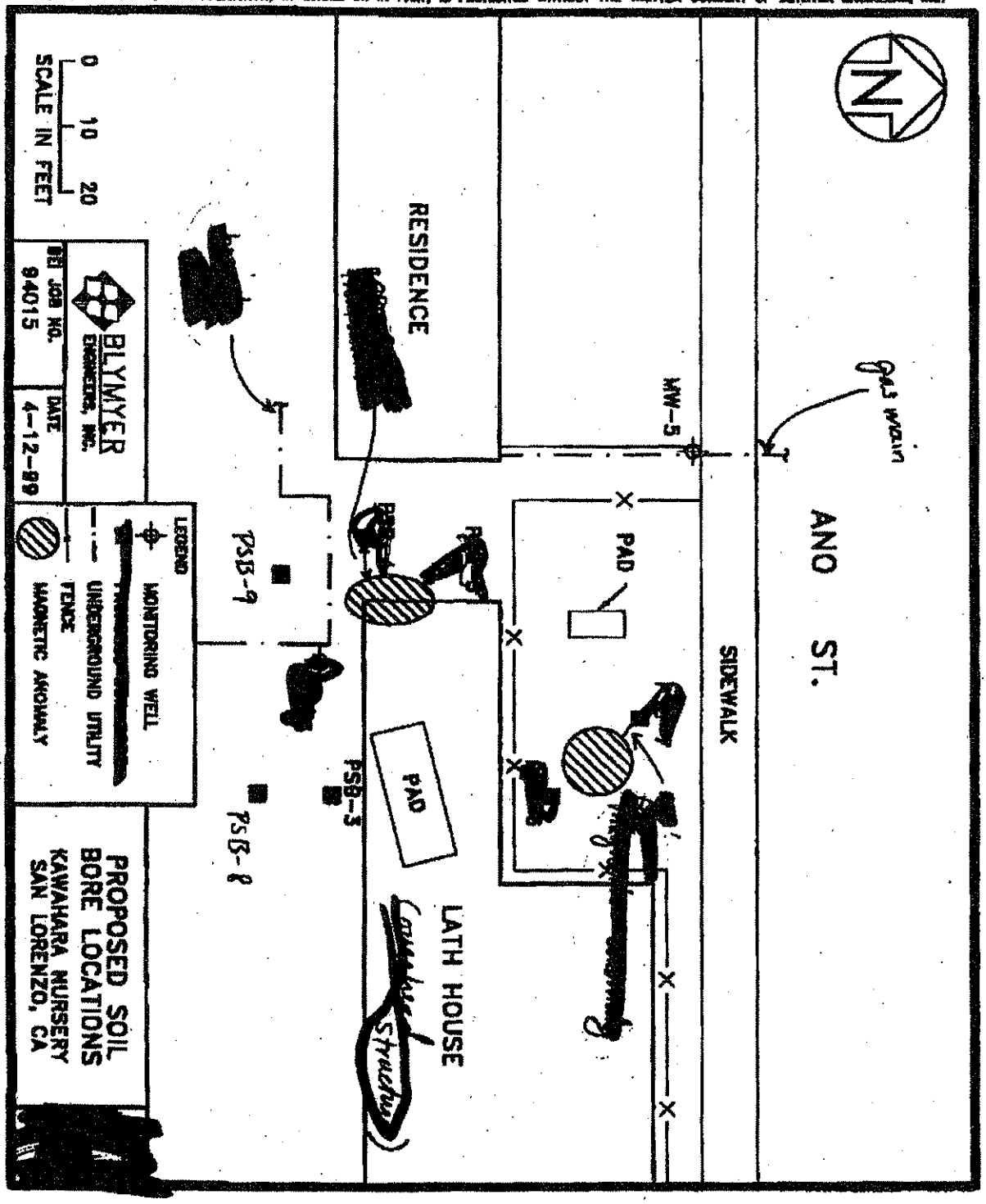
c: Attn: Laurie Buckman, Blymyer Engineers, Inc., 1829 Clement Ave., Alameda CA 94501-1395

Cheryl Gordon, SWRCB
ALL- File

Sample ID	Collection Date	Modified EPA Method 8015 (mg/kg)		EPA Method 8020 (ug/kg)			
		TPH as Gasoline	TPH as Diesel	Benzene	Toluene	Ethylbenzene	Total Xylenes
MW-1 5'	6/10/93	<1	<1	<5	<5	<5	<5
MW-1 16'	6/10/93	<1	<1	<5	<5	<5	<5
MW-2 2.5'	6/10/93	<1	1.9	<5	<5	<5	<5
MW-2 11.5	6/10/93	<1	<1	<5	<5	<5	<5
MW-3 6'	6/10/93	<1	<1	<5	<5	<5	<5
MW-3 15'	6/10/93	<1	<1	200	900	680	4,800
MW-4 12'	10/31/94	1	<1	<2.5	<2.5	<2.5	<2.5
MW-4 17'	10/31/94	<1	<1	<2.5	<2.5	<2.5	<2.5
MW-5 12.5'	10/31/94	<1	<1	<2.5	<2.5	<2.5	<2.5
MW-5 17'	10/31/94	<1	<1	<2.5	11	<2.5	27
SB-1 7.5'	10/31/94	<1	<1	<2.5	<2.5	<2.5	<2.5
SB-1 17'	10/31/94	[illegible]	4.1	<2.5	<2.5	<2.5	<2.5

Notes:

TPH = total petroleum hydrocarbons
EPA = Environmental Protection Agency
<x = not detected above the analytical method reporting limit of x
mg/kg = milligrams per kilogram
µg/kg = micrograms per kilogram



RO291

State Water Resources Control Board

Division of Financial Assistance
1001 I Street • Sacramento, California 95814
P.O. Box 944212 • Sacramento, California • 94244-2120
(916) 341-5831• FAX (916) 341-5806• www.waterboards.ca.gov/water_issues/programs/ustcf/

Linda S. Adams
Secretary for
Environmental Protection

Arnold Schwarzenegger
Governor

December 8, 2008

Mr. John Kawahar
Kawahara Nursery, Inc.
698 Burnett Ave
Morgan Hill, CA 95037

REQUEST FOR PRE-APPROVAL OF CORRECTIVE ACTION COSTS,
CLAIM NO. 009201, PRE-APPROVAL REQUEST NO. 3
SITE ADDRESS: 16550 ASHLAND AVE, SAN LORENZO, CA 94580

I have reviewed your request, received on November 13, 2008, for pre-approval of corrective action costs; I will place these documents in your file for future reference. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective action costs. Pursuant to Section 2811.4, subdivision (c), of the Cleanup Fund regulations and based upon the materials submitted, the Cleanup Fund must deny your request for pre-approval.

Should you have any questions, please don't hesitate to call me at (916) 341-5831.

Sincerely,

Hari Patel

Hari Patel, Water Resources Control Engineer
Technical Review Unit
Underground Storage Tank Cleanup Fund

Enclosure

cc: Mr. Chuck Headley
RWQCB, Region 2
1515 Clay Street, Ste. 1400
Oakland, CA 94612

Mr. Steven Plunkett
Hazardous Materials Specialist
Environmental Protection
Alameda County Health Care Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

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

May 18, 1994

Mr. Sam Kawahara
Kawahara Nursery
16550 Ashland Ave.
San Lorenzo, CA 94580

STID 4403

Re: Blymyer's Status Report for Kawahara Nursery, located at 16550 Ashland Ave., San Lorenzo, California

Dear Mr. Kawahara,

This office has received and reviewed Blymyer's Subsurface Investigation Status Report, dated April 29, 1994. According to the investigation results and the well log for the irrigation well, it appears that this irrigation well is drawing from a deeper aquifer than the on-site monitoring wells and is not influencing the migration of the shallower ground water contaminant plume observed in Well MW-3. It appears that there is a clay layer, approximately 10 feet thick, which separates the shallower aquifer, which is screened by the on-site monitoring wells, from the deeper aquifer, which is screened by the irrigation well. Therefore, it appears that pumping of this irrigation well may continue at the site.

Per the latest ground water sampling results, collected on March 28, 1994, elevated levels of Total Petroleum Hydrocarbons as gas and diesel and benzene, toluene, ethylbenzene, and xylenes persist in Well MW-3. Additionally, elevated levels of soil contamination appear to be situated in the gravel lense observed in Well MW-3, at approximately 15 feet below ground surface, per the soil sample results collected in June 1993. Further delineation of the observed soil and ground water contamination is required. Blymyer has proposed to conduct a soil gas survey and install three additional monitoring wells at the site in order to locate the source of the observed contamination and delineate the extent of soil and ground water contamination. This proposal is acceptable to this office. A summary work plan outlining the details of this work is due to this office within **60 days** of the date of this letter.

Please be reminded that as part of the required investigations, you will be required to address the delineation of the diesel soil contamination observed in the tank pit during the tank removal, at 5,000 ppm.

CONFIDENTIAL

STATE OF CALIFORNIA DWR
WELL COMPLETION REPORT
(WELL LOGS)

REMOVED

WORK PLAN FOR
ADDITIONAL SOIL AND GROUNDWATER INVESTIGATION

A&C Auto Service
186 E. Lewelling Boulevard
San Lorenzo, California

Prepared for
Mr. Carl Graffenstatte

Prepared by
Sierra Environmental, Inc.

April 17, 2009
Project 09-137.07

the deeper wells on shallow groundwater flow pattern at the Site is unlikely. Shallower irrigation wells near the Site such as the one in Kawahara Nursery may have an influence on variation of groundwater flow direction pattern at the Site. However, based on the dissolved contaminant concentrations in groundwater samples collected at and near the Site (Figure 3), dominant groundwater flow direction appears to be toward west/southwest.

Task 2 - PROPOSED ADDITIONAL SUBSURFACE INVESTIGATION

Delineate vertical Extent of the Soil Contamination At The Source Areas

In his letter, Mr. Plunket indicated that up to 110 mg/kg total petroleum hydrocarbons as gasoline (TPHG) was detected in the soil samples collected at 19.5 feet bgs at monitoring well MW-3. Consequently, he requested to define extend of soil contamination in the source area, below 20 feet bgs. Sierra does not have the information related to soil contamination conditions at the monitoring wells as they were constructed by CET. However, available information to Sierra indicates that up to 4,000 mg/kg TPHG was detected in the soil samples collected from beneath the former gasoline tanks at the Site. During its May 15 and 29, 2007, soil and groundwater sampling at and near the Site, Sierra encountered shallow groundwater at 16-20 feet bgs. Therefore, vertical extend of soil contamination in the source areas is to the saturated zone. However, Sierra does no have accurate and up-to-date information related to the concentrations of contaminants in unsaturated zone at the source areas (former UST excavation and MW-3). Therefore, Sierra proposes to advance one boring (SB-7) at the former UST, and one (SB-8) near MW-3 (former pump island area) to characterize soil condition in these areas. The depth of the borings will be approximately 20-25 feet, or within 5 feet through the saturated zone. The proposed boring locations are shown in Figure 3.

Sierra proposes using a Geoprobe™ direct push equipment for soil sampling at SB-7 and SB-8. The boring locations are shown in Figure 3. Geoprobe™ is mounted on a truck. The drilling equipment consists of a hollow barrel (4 feet long) lined with a clean plastic tube (also 4-foot long) and attached to steel rods. The barrel penetrates into the soil by a hydraulic hammer. After collecting soil in the plastic tubes, Sierra will inspect the soil for any odor or stain, and its physical characteristics will be documented in boring logs. They will also be screened with photo ionization detector (PID) for presence

Water Supply and Demand

Supply by Source	Actual FY 03-04 (ccf)	Actual FY 04-05 (ccf)	Actual FY 05-06 (ccf)	Actual FY 06-07 (ccf)
San Francisco Water	9,587,525	9,030,652	8,761,512	8,901,286
Local Groundwater	0	0	0	0
Surface Water	0	0	0	0
Recycled Water	0	0	0	0
Other - EBMUD & ACWD (Temporary supplies)	0	0	162,551	0
Total	9,587,525	9,030,652	8,924,063	8,901,286
mgd equivalent	19.65	18.51	18.29	18.24

Demand by Sector				
Residential	5,152,845	5,029,483	4,982,982	5,191,902
Commercial/Industrial	2,481,308	2,492,490	2,354,074	2,477,346
Other	950,224	596,639	594,869	655,734
Unaccounted for*	1,003,148	912,040	992,138	576,304
Total	9,587,525	9,030,652	8,924,063	8,901,286
mgd equivalent	19.65	18.51	18.29	18.24

Per Capita Use	Actual FY 03-04 (gpcpd)	Actual FY 04-05 (gpcpd)	Actual FY 05-06 (gpcpd)	Actual FY 06-07 (gpcpd)
Residential	73	71	70	72
Gross	136	127	125	123

*Increase in unaccounted for water in 2003-04 is assumed to be due in part to changes and delays in meter reading cycles, which have caused discrepancies in the amount of water purchased vs. the amount billed to customers during the same period. The City implemented a system-wide leak detection survey and repair project in 2006-07.

Facilities and Distribution

Storage Reservoirs

Designation	Type	Capacity (gallons)
Treeview	Concrete	3,000,000
Maitland	Concrete	1,000,000
North Walpert	Concrete	1,500,000
South Walpert	Steel	5,300,000
D Street	Concrete	1,000,000
High School	Concrete	1,000,000
250 East	Concrete	500,000
250 West	Concrete	500,000
Highland 500	Concrete	3,000,000
Highland 750	Steel	4,400,000
Highland 1000	Steel	1,000,000
Highland 1285	Steel	1,800,000
Garin Hills	Steel	1,250,000
Highland 1530	Steel	2,900,000
	Total	28,150,000

Attachment L

cc: Mr. David Kears
Alameda County Health Care Services
1000 San Leandro Blvd., Suite 300
San Leandro, CA 94577

Ms. Donna Drogos
Alameda County Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Jerry Wickham
Alameda County Environmental Health
1131 Habor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Mr. David DeMent
PII Environmental
4366 Terrabella Way
Oakland, CA 94619

Mr. Bruce Wolfe
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Mr. Chuck Headlee
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Wai Yee Young
4230 Habor View Avenue
Oakland, CA 94619

Ms. Katherine Dungca
AvioRealco, LLC
27675 Vista Bahia Way
Hayward, CA 94542

cc: (Continued next page)

cc: (Continued)

To the Resident of
181 E. Lewelling Blvd.
San Lorenzo, CA 94580-1733

George & Genevieve Reppond
1188 Glen Drive
San Leandro, CA 94577-3850

To the Residents of
144 E. Lewelling Blvd. #10
San Lorenzo, CA 94580

To the Residents of
144 E. Lewelling Blvd. #11
San Lorenzo, CA 94580

To the Residents of
144 E. Lewelling Blvd. #12
San Lorenzo, CA 94580

To the Residents of
144 E. Lewelling Blvd. #13
San Lorenzo, CA 94580

To the Residents of
144 E. Lewelling Blvd. #14
San Lorenzo, CA 94580

To the Residents of
144 E. Lewelling Blvd. #15
San Lorenzo, CA 94580

To the Residents of
144 E. Lewelling Blvd. #16
San Lorenzo, CA 94580

cc: (Continued next page)

cc: (Continued)

To the Residents of
144 E. Lewelling Blvd. #26
San Lorenzo, CA 94580

To the Residents of
144 E. Lewelling Blvd. #27
San Lorenzo, CA 94580

To the Residents of
144 E. Lewelling Blvd. #28
San Lorenzo, CA 94580

To the Residents of
144 E. Lewelling Blvd. #29
San Lorenzo, CA 94580

To the Residents of
144 E. Lewelling Blvd. #30
San Lorenzo, CA 94580

To the Residents of
144 E. Lewelling Blvd. #31
San Lorenzo, CA 94580

To the Residents of
144 E. Lewelling Blvd. #32
San Lorenzo, CA 94580

Linda S. Adams
Secretary for
Environmental Protection

State Water Resources Control Board

Division of Water Quality
1001 I Street, Sacramento, California 95814 ♦ (916) 341-5851
Mailing Address: P.O. Box 2231, Sacramento, California 95812
FAX (916) 341-5808 ♦ Internet Address: http://www.waterboards.ca.gov

Arnold Schwarzenegger
Governor

DRAFT
UST Case Closure Summary
New Performance; Mr. Carl Graffenstatte (Petitioner)
186 E. Lewelling Boulevard, San Lorenzo

Summary:
The release from the subject site was discovered during the removal of underground storage tanks (USTs) in 1990. The Alameda County Environmental Health Department (Alameda County) staff denied the Petitioner's request for closure because concentrations of total petroleum hydrocarbons as gasoline (TPHg), benzene, and xylenes remain above San Francisco Bay Water Board's Basin Plan Water Quality Objectives (WQOs) and contend that additional site characterization is needed.

The site is located in a commercial and residential area that is served by public water supply. An irrigation well is located approximately 1,100 feet northwest of the site. The well is about 600 feet deep with 200-foot sanitary seal. San Lorenzo Creek, a concrete lined channel, is approximately 300 feet south from the former UST's. The affected shallow groundwater (15 feet below ground surface (bgs)) in the vicinity of the former UST system is not used as a source of water supply nor is it likely to be used as a source of water supply in the future.

Monitor wells near the source area and groundwater grab samples from soil borings outside of the source area indicate that remaining residual petroleum hydrocarbons are limited to shallow soil and groundwater in the immediate vicinity of the site. Concentrations of benzene, toluene, ethylbenzene and xylenes (BTEX), which are the more highly volatile/soluble petroleum hydrocarbons, have decreased to near or below WQOs. Trend lines show that water quality objectives for the less volatile constituents of TPHg will be attained in several decades within the limited affected groundwater.

Based on facts in the record and the hydrologic and geologic conditions at the site, the limited residual petroleum hydrocarbons that remain in shallow soil and groundwater in the immediate vicinity of the site pose a low risk to public health, safety and the environment. For these reasons, case closure is appropriate.

Background:
This UST Case Closure Summary has been prepared in support of a petition to the State Water Resources Control Board (State Water Board) for closure of the UST case at 186 E. Lewelling Boulevard, San Lorenzo (site). All record owners of fee title for this site as well as adjacent property owners and other interested parties have been notified of the recommendation for closure and were given the opportunity to provide comments.

- Hydrology: Semi-confined and has varied historically in the monitor wells from 12 to 17 feet bgs. First water was encountered during drilling at approximately 19 feet bgs, static level was about 15 feet bgs
- Estimate of Remaining Mass in Soil: Small – shallow and limited to immediate vicinity of former UST's
- Estimated Time to Meet WQOs: Several decades
- Potential Receptors: San Lorenzo Creek, concrete channel located approximately 300 feet south of the site

Site History:
The site operated as a gasoline service station from 1965 to 1990. In September 1990, two 4,000-gallon gasoline USTs and one 350-gallon waste oil tank were removed. Analytical results from soil samples indicated an impact by fuel hydrocarbons. Over the course of several corrective actions, three monitoring wells and six soil borings have been drilled and sampled.

In June 2002, the Petitioner's consultant requested case closure. In correspondence dated September 25, 2006, Alameda County staff denied the request and requested an additional soil and groundwater investigation. On May 11, 2009 the Petitioner petitioned the case to the State Water Board.

Contaminant Concentrations:
Over the course of corrective actions at the site, concentrations of BTEX have been reported for samples from wells MW-1, MW-2, and MW-3. Site data show concentrations of toluene and ethylbenzene have decreased to below WQO concentrations in all wells. (Table 1 presents a summary of soil samples and Table 2 presents a summary of groundwater samples.)

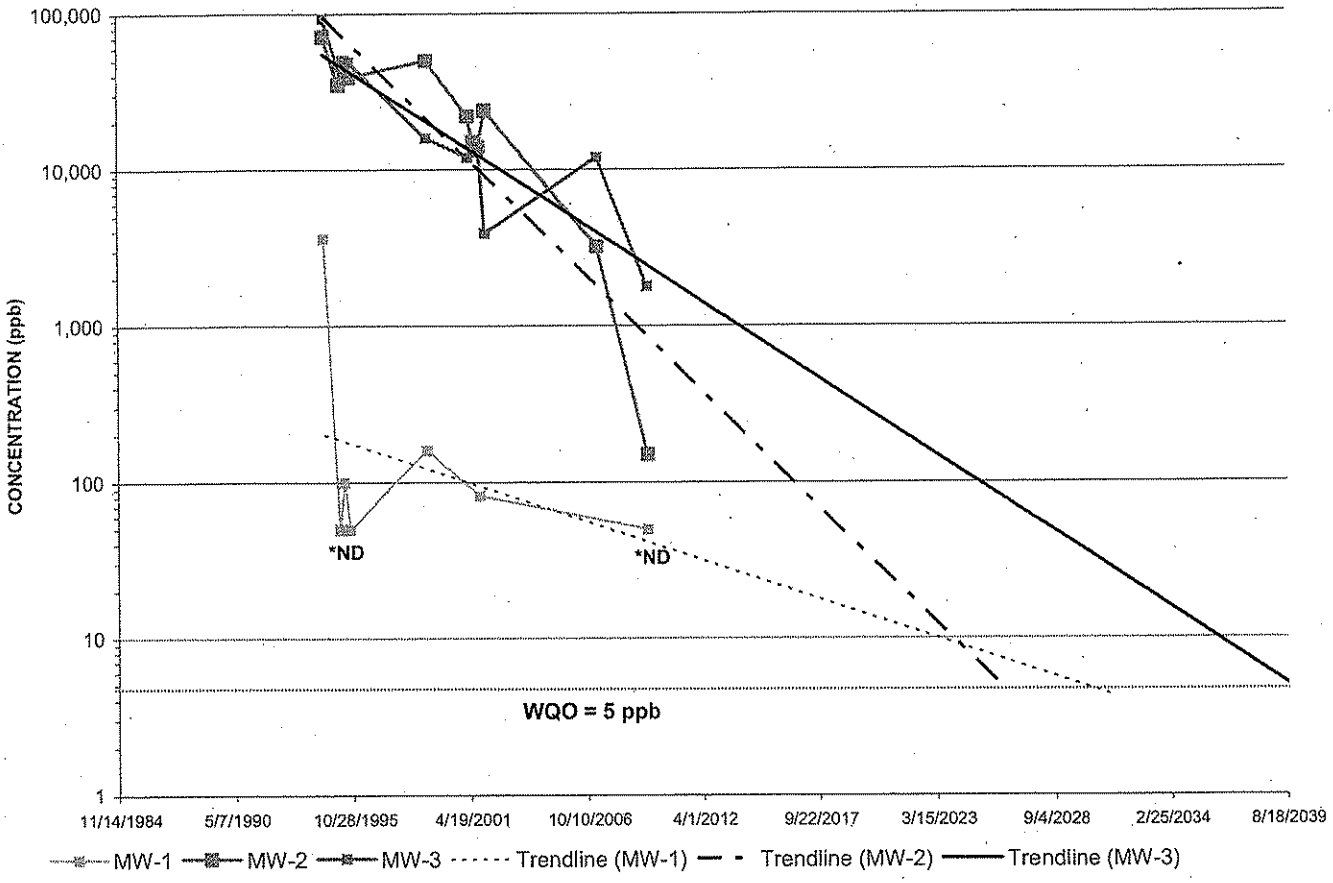
Concentrations of benzene and xylenes were reported in well MW-3 in August 2009 as not detected above laboratory reporting limits (<10 ppb, <20 ppb, respectively) and are anticipated to continue to attenuate and follow the deceasing trend. Benzene and xylenes concentrations are estimated to reach the WQO concentrations in less than a decade.

Concentrations of TPHg were reported in wells MW-2 (151 ppb) and MW-3 (1,790 ppb) in August 2009 and are anticipated to continue to attenuate and follow the deceasing trend. TPHg concentrations are estimated to reach the WQO concentration in several decades (Figure 1).

Petroleum hydrocarbon concentrations in groundwater near the source area (wells MW-1, through MW-3) have substantially decreased over time, specifically concentrations of BTEX, which are more highly volatile/soluble petroleum hydrocarbons, have decreased to near or below WQOs. Six soil borings (SB-1 through SB-6) were drilled and sampled in May 2007. Of the six grab groundwater samples[1] only one sample (W-3) was

[1] A grab groundwater sample typically collected directly from borehole.

FIGURE 1: TPHg CONCENTRATIONS IN WELLS MW-1, MW-2 and MW-3



Objections to Closure:

1. In a response to the petition dated July 15, 2009, Alameda County staff indicated that contaminated backfill likely remains in the area of the former gasoline tanks and beneath the former dispenser island.

   Response: Soil sampling confirms that petroleum impacted soil remains at the site. However, to remove all traces of residual petroleum constituents at Petitioner's site in the short-term would require additional excavation of soil at the site to depths of up to 20 feet. Excavation of approximately 4,700 cubic yards of soil would eliminate most if not all of the residual petroleum hydrocarbons at the site. However, there would be little benefit to current or anticipated beneficial uses of groundwater that is not meeting WQOs for benzene, xylenes and TPHg. In addition, if complete removal of detectable traces of petroleum constituents becomes the standard for UST corrective actions, the statewide technical and economic implications will be enormous. For example, disposal of soils from comparable areas of excavation throughout the state would greatly impact

Response: An irrigation well at San Lorenzo High School is located approximately 1,100 feet northwest of the site. The well is about 600 feet deep with 200-foot sanitary seal.

Downward migration of petroleum hydrocarbons is minimal. The data show that fine grained sediments at the site are retarding the migration of petroleum hydrocarbons in the groundwater beneath the site and allowing for the plume to naturally attenuate. It is unlikely that the shallow groundwater plume is hydraulically connected to the irrigation well at San Lorenzo High School that is located 1,100 feet northwest of the site. Even if shallow groundwater was affected in the vicinity of the high school well, the well has a 200-foot sanitary seal which would preclude any shallow groundwater from impacting the well

Closure:

Does corrective action performed to date ensure the protection of human health, safety, and the environment? Yes.

Is corrective action and UST case closure consistent with State Water Board Resolution 92-49? Yes.

Is achieving background water quality feasible? No.

To remove all traces of residual petroleum constituents at the site would require significant additional effort and cost. As previously noted, the site is completely paved. Approximately 4,700 cubic yards of soil would have to be removed to eliminate all traces of petroleum contamination in the soil. If complete removal of detectable traces of petroleum constituents becomes the standard for UST corrective actions, the statewide technical and economic implications will be enormous. For example, disposal of soils from comparable areas of excavation throughout the state would greatly impact already limited landfill space. In light of the precedent that would be set by requiring additional excavation at this site and the fact that beneficial uses are not threatened, it is not feasible to attain background water quality at this site.

If achieving background water quality is not feasible, is the alternative cleanup level consistent with the maximum benefit to the people of the state? Yes.

It is impossible to determine the precise level of water quality that will be attained given the limited residual petroleum hydrocarbons that remain at the site, but in light of all the factors discussed above, and the fact that the residual petroleum constituents will not unreasonably affect present and anticipated beneficial uses of groundwater, a level of water quality will be attained that is consistent with the maximum benefit to the people of the state.

The approximate time period in which the requisite level of water quality for dissolved petroleum hydrocarbons will be met is estimated to be several decades.

Though the requisite level of water quality has not been met, water quality objectives will be achieved via natural attenuation in a few decades. This is a reasonable period in which to meet the requisite level of water quality because the affected groundwater is not currently being used as a source of drinking water and it is highly unlikely that the affected groundwater will be used as a source of drinking water during the period of impairment.

Summary and Conclusions:

Two USTs and one waste oil tank were removed from the site in 1990. Since that time, data shows that residual petroleum hydrocarbons dissolved in groundwater and sorbed to shallow soil are localized and limited in extent and will continue to naturally degrade and attenuate. Based on the hydrology, geology, and other factors at and in the vicinity of the site, shallow affected groundwater does not represent a threat to public health and safety, or the environment. Site stratigraphy and well construction standards preclude any pathway to local water production zones. Shallow groundwater is not used as a source of drinking water or for any other designated beneficial use nor is it likely to be beneficially used in the foreseeable future. Case closure is appropriate.

Prepared By: _____ _____
Ben Wright Date
Engineering Geologist

Reviewed By: _____ _____
Kevin Graves, PE#55596 Date
Supervising Water Resource Control Engineer

Attachment M

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

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

August 11, 1997

STID #2690

REMEDIAL ACTION COMPLETION CERTIFICATION

Mr. Scott Hilyard
Military Dept., Acct.-#43,
P.O. Box 269101,
Sacramento, CA 95826-9101

Subject: California National Guard Facility, 16501 Ashland Ave., San Lorenzo, CA 94580 - 2,000 gallon gasoline underground storage tank

Dear Mr. Hilyard,

This letter confirms the completion of a site investigation and remedial action for the underground storage tank formerly located at the above described location. Thank you for your cooperation throughout this investigation. Your willingness and promptness in responding to our inquiries concerning the former underground storage tank are greatly appreciated.

Based upon the available information in the above-referenced file and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action related to the underground storage tank release is required.

This notice is issued pursuant to a regulation contained in Section 2721(e) of Title 23 of the California Code of Regulations.

Please contact Brian P. Oliva, at (510) 567-6737 if you have any questions regarding this matter.

Sincerely,

Mee Ling Tung
Director of Environmental Health Services

enclosure

c: Chief, Hazardous Materials Division - files
Brian P. Oliva, ACDEH
Kevin Graves, RWQCB
Lori Casias, SWRCB
Cheryl Gordon, State Cleanup Fund
Jim Ferdinand, Alameda County Fire Depatment

III. RELEASE AND SITE CHARACTERIZATION INFORMATION (cont'd)

Treatment and Disposal of Affected Material:

Material	Amount (include units)	Action (Treatment or Disposal w/destination)	Date
Tank	1-2,000 gallon UST	Erickson, 255 Parr Blvd., Richmond CA	04/22/93
Rinsate	400 gallons	Gibson Oil, 475 Sea Port Blvd., Redwood City CA	04/22/93

Maximum Documented Contaminant Concentrations - - Before and After Cleanup

Contaminant	Soil (ppm)		Water (ppb)	
	Before[1]	After[2]	Before[3]	After[4]
TPH (Gasoline)	73	NA	110,000	4,100
TPH (Diesel)	17	"	56	ND
Benzene	0.438	"	7,210	18
Toluene	3.4	"	13,500	4.2
Ethylbenzene	1.7	"	2,680	110
Xylene	10.4	"	12,000	27
MTBE	NT	NT	NT	ND

NT=not tested

1"Before" soil sample collected from the gasoline UST pit after the tank was removed in 04/93; TPH-D result collected from boring B-3 at 10 ft. bgs.
2 The removal of contaminated soil was not completed at this site.
3"Before" water collected as a "grab" sample from the gasoline UST pit in April 1993, except for TPH-G result was collected from a "grab" groundwater sample from boring B-3 and TPH-D result was collected from boring B-9 in July 1993.
4"After" water represents the max. conc. detected during four quarters of sampling monitoring wells MW1-MW3 from 1993 to 1996.
Comments (Depth of Remediation, etc.): See "Additional Comments" section.

IV. CLOSURE

Does corrective action protect public health for current land use? **Yes**
Site management requirements: **If a change in land use is proposed or excavation of soils is planned at this site, then an evaluation of risk from exposure to contaminated soil and groundwater must be made.**

Should corrective action be reviewed if land use changes? **YES**

Monitoring wells Decommissioned: **Pending case closure approval.**
Number Decommissioned: **0** Number Retained: **3 (MW1-MW3)**

List enforcement actions taken: **n/a**
List enforcement actions rescinded: **n/a**

V. ADDITIONAL COMMENTS

The National Guard Organization Maintenance Shop No. 35 located at 16501 Ashland Avenue in San Lorenzo, California has been a military staging post since the Korean War era. One 2,000-gallon gasoline underground storage tank (UST) of single-walled steel construction was installed at this site around 1951 and was used intermittently until it was removed in 1993. (See attachment 1 for site location and layout.)

In November and December 1989, the gas tank piping system was upgraded to double walled-fiberglass piping

V. ADDITIONAL COMMENTS (cont'd)

MW-3 between 7/93 and 8/96. TPH-G, TPH-D, and BTEX were not detected in MW-1 and MW-2. MTBE was not detected in any of the monitoring wells. (See attachment 8 for historical groundwater data.)

No further investigations are recommended since this site appears to meet the San Francisco RWQCB's definition of a low risk groundwater case:

1. The source of contamination was abated by removal of the UST system. Although there are no written reports that overexcavation of contaminated soil occurred at this site, soil samples collected from borings within the vicinity of the UST system were ND for TPH-G and BTEX, except for a sample collected at 10 ft. bgs within the capillary fringe from boring B-3.

2. The extent of impact to soil and groundwater has been evaluated at this site by analysis of multiple soil and groundwater samples collected within and in the vicinity of the former UST system.

3. Analytical groundwater data collected 4 times over 3 years has shown that the dissolved hydrocarbon plume is not significantly migrating and concentrations have shown significant attenuation since 1993.

4. The residual contamination left in soil and groundwater at this site is not expected to significantly impact water wells, deeper drinking water aquifers, surface water, or other sensitive receptors. Shallow groundwater at this site is not used for municipal or domestic purposes. A deeper water-bearing (sandy) layer has been encountered between 22 and 25 feet bgs. "Grab" groundwater samples have been collected from this deeper water-bearing layer in three different locations at the site. TPH-G, TPH-D, and BTEX were non-detect in all samples. (See attachment 9 for sample locations and results.) A well survey completed in 1996 reported there are 27 wells within a 1/2-mile radius of the site. The closest of these wells to the tank area are irrigation wells located approximately 400 feet to the north and 300 feet to the southeast. All wells appear to be screened below the first shallow water bearing layer. (See attachment 10 for well locations.)

5. No significant risk to human health was found for outdoor inhalation for commercial exposure scenarios to benzene from soil or groundwater contamination using the ASTM E1739-95 Tier 1 RBSL Look-up Table for a $1x10^{-5}$ excess cancer risk. There are currently no buildings or structures over the soil and groundwater contaminant plume.

6. It does not appear that sensitive ecological receptors are currently impacted by the petroleum hydrocarbon release from this site; therefore, an environmental risk analysis was not performed.

A risk management strategy should be developed to:

- If appropriate, mitigate any potential negative impacts posed by the residual contamination remaining on site (e.g., install vapor barriers beneath new building construction).

- Develop a strategy to address any risk posed to the construction or utility worker exposure during earth moving activities in the vicinity of the former tank pit.

- Take precautions to avoid making vertical or lateral conduits that may cause cross contamination between the shallow and deeper aquifers.

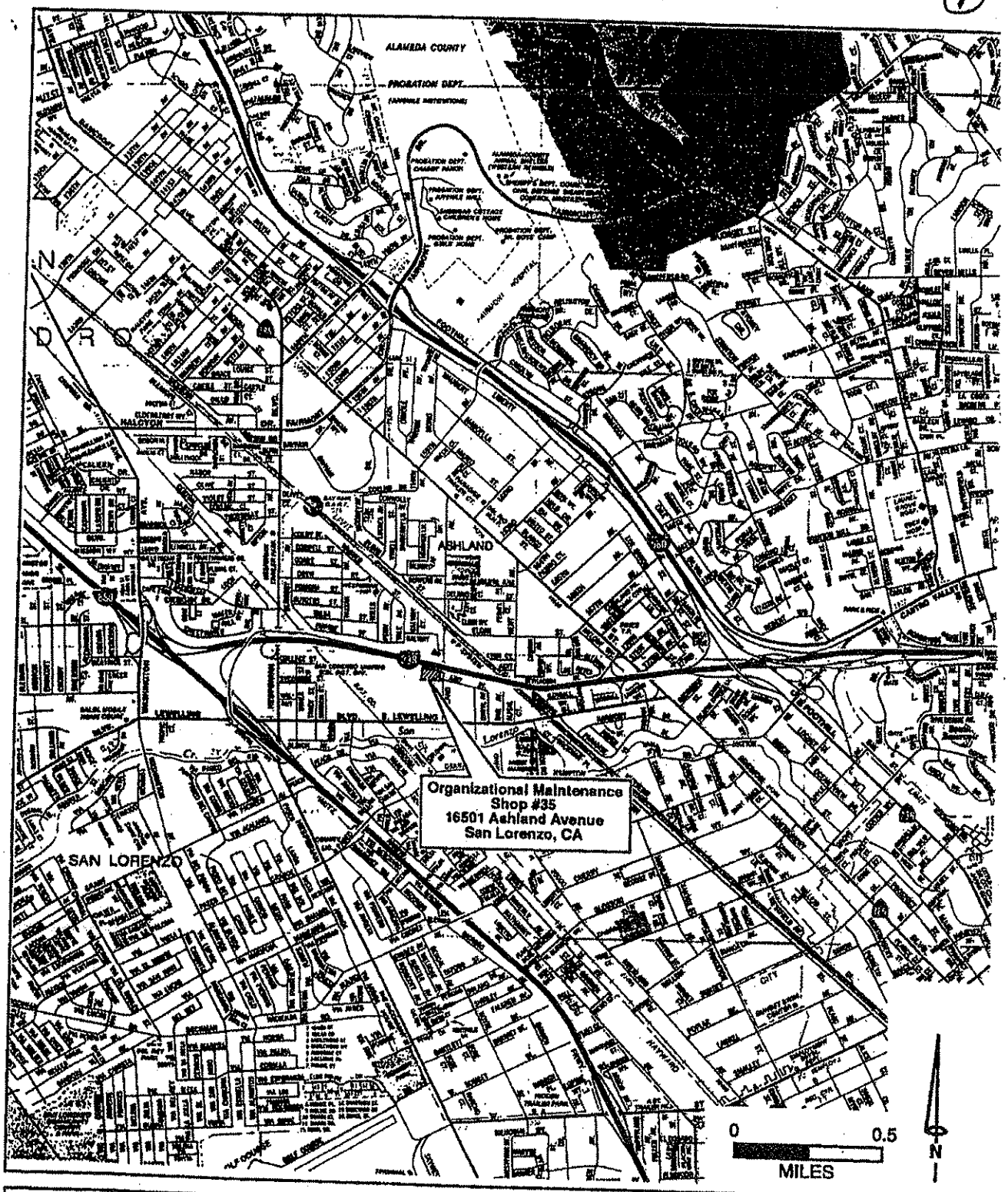


Figure 1B **Site Location Map**

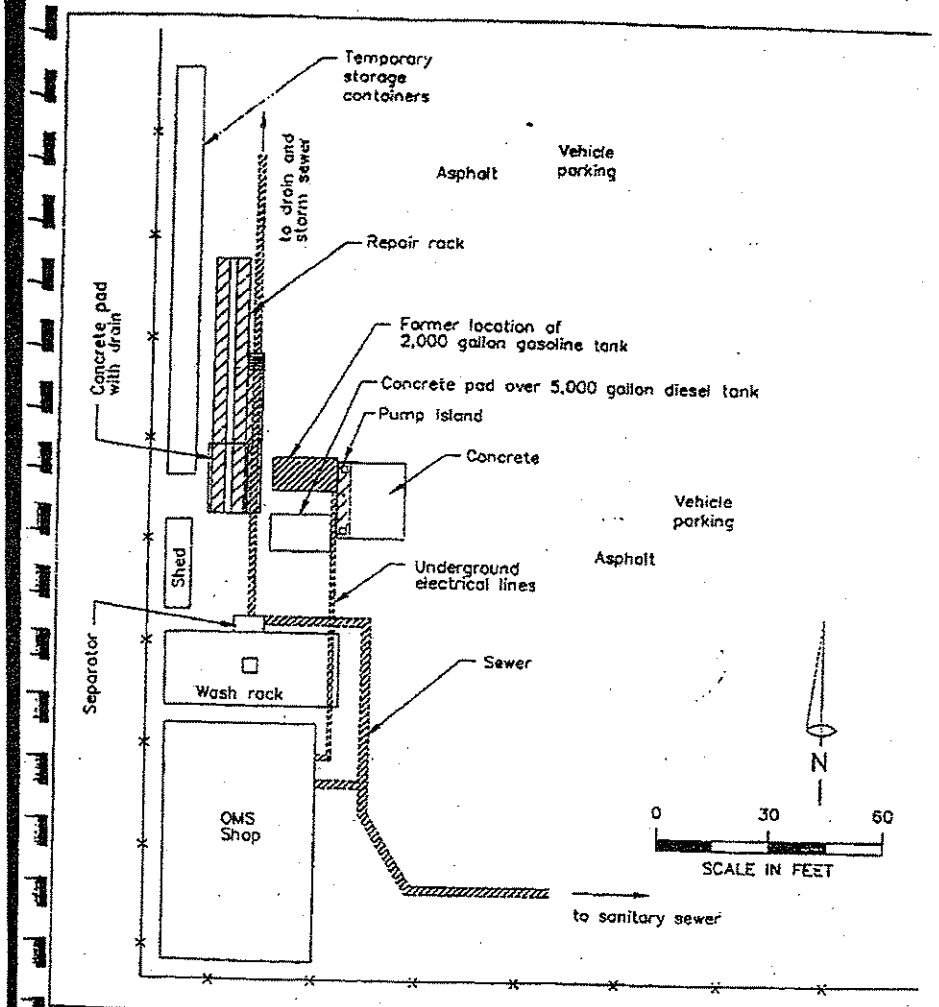


Figure 2 Site Map

PROJECT NO.9410-01 DRAWN BY EK DATE 6/3/93 FILE NO. SITEPLAN

93

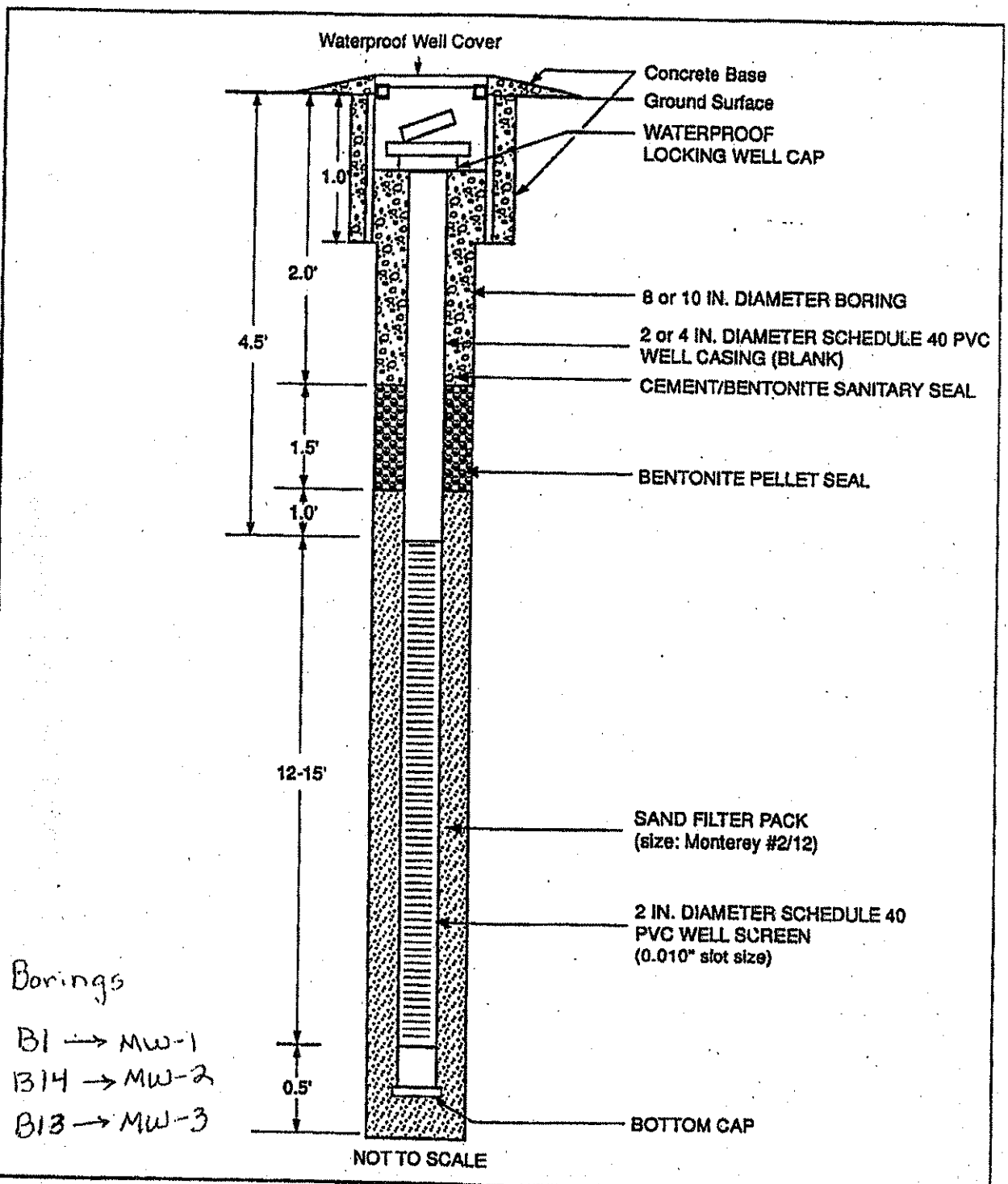
Table 1
Analytical Results for Ground Water and Soil Samples Collected April 21, 1992 from the Tank Removal Excavation at OMS #35
16501 Ashland Avenue, San Lorenzo, CA

Sample No.	Sample type and location	Depth (ft)	TPH-g (ppm)[1]	Benzene (ppb)[2]	Ethyl benzene (ppb)[2]	Toluene (ppb)[2]	Xylenes (ppb)[2]
SL-1	stockpiled soil	not applicable	297	450	5,790	6,420	35,800
SL-2	ground water from the excavation	~7	51.4	7,210	2,680	13,500	12,000
SL-3	soil, E sidewall	~5	73	438	1,700	3,410	10,400
SL-4	soil, W sidewall	~6.5	ND<1.0	ND<5	ND<5	ND<5	ND<15
SL-5	soil, W sidewall	between 6.5 and 7.5	ND<1.0	ND<5	ND<5	ND<5	23

(1) ppm = parts per million = mg/l for water, mg/kg for soil
(2) ppb = parts per billion = µg/l for water, µg/kg for soil

Lab Analytical Reports not included w/this report.

(3)



Borings

B1 → MW-1

B14 → MW-2

B13 → MW-3

Figure 3 **Monitoring Well Construction Diagram**

TETRA TECH, INC.
FIELD LOG OF BORING

Boring #: B14/MW2
Sheet 1 of 2

Project Name and Location: SAN LORENZO
TC Number: 9410
Elevation:
Date and Time Started: 7/8/93 1515
Date and Time Completed: 7/8/93 @ 1620
Completion Depth: 20.5'
Number of Samples: Drive: 3 | 1-liter: 2 1 | VOA: 7 | Other:
Boring Diameter & Drilling Method: 8" HOLLOW STEM.
Water Level: First (date/time): 11.5', (7/8/93 BGS) | Second (date/time):
Sampler: SPLIT SPOON
Hammer Wt.: 140
Drop: 30
Boring Location: 18' NORTH, 74' SW of FENCE LINES
Drilling Co.: GREAT SIERRA SAMPLING
Driller: P. REESE
Geologist: K. BISHOP

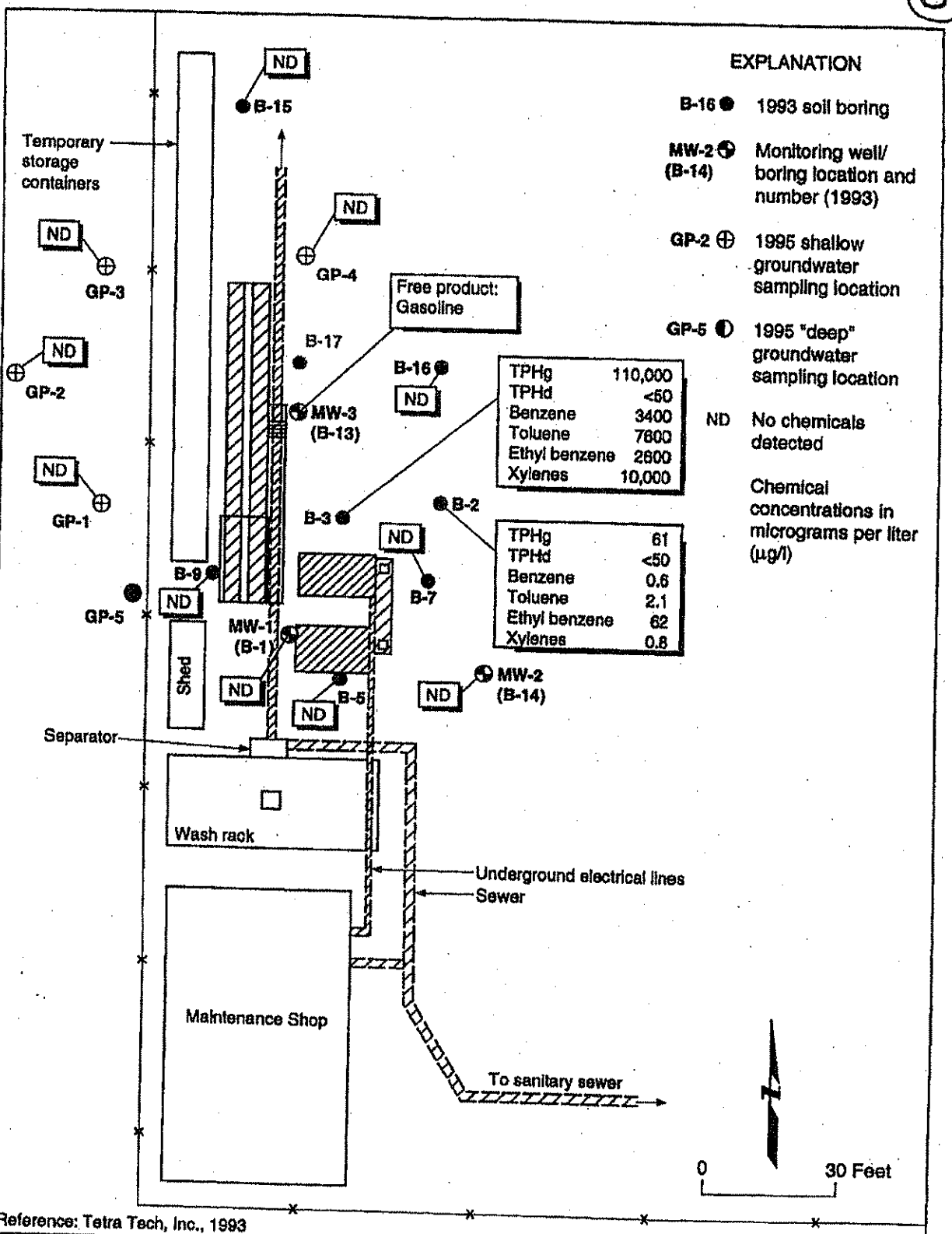
Depth (ft.)	Sample No.	Sample Interval	Recovery	Blow Count	Description	Graphic Symbol	USCS Symbol	Gr	Sa	Si	Cl	P.I.D. Reading	Comments
0					A/C.								
1					BASEROCK.								
2					DK BROWN SILTY CLAY MOIST–DAMP NO ODOR, SOFT.		CL						CUTTINGS 0–2.5'
3													
4													
5													
6													
7													
8													
9													
10				10	DK BROWN SILTY CLAY, DAMP, FIRM NO ODOR.		CL						
	B14-9.5			11	MED. BROWN SAND.		SP					ND	1540
11	B14-10.0			15	BROWN SILTY CLAY, DAMP STIFF, NO ODOR.		CL					0.0	1542
12					AT H_2O TOOK H_2O SAMPLES								H_2O
13													
14				13	DK BROWN OLIVE SILTY CLAY, V. STIFF, DAMP, NO ODOR.		CL					0.0	1555
15	B14-14.5			17	SAME AS ABOVE								
	B14-15.0			20									
16													

TETRA TECH, INC.
FIELD LOG OF BORING

Boring #: B14
Sheet 2 of 2

Project Name and Location: SAN LORENZO, DMS #35
TC Number: 9410-02

Depth (ft.)	Sample No.	Sample Interval	Recovery	Blow Count	Description	Graphic Symbol	USCS Symbol	Gr	Sa	Si	Cl	P.I.D. Reading	Comments
15													
16													
17													
18													
19				12	[illegible] DK BROWN OLIVE SILTY CLAY V. STIFF, NO ODOR.		CL						
20	B14-20 (19.5)			19								0	1600
	B14-20.0			31	CLAYEY SILT, OLIVE, WET V. HARD, NO ODOR.								1602
21							ML					0.0	
22					E.O.B. @ 20.5'.								
23					INSTALLED 2" WELL. & 15' SCREEN -0.010 SLOT 5' BLANK SCREEN								
24					SAND PACK UP TO 4' BGS								
25					BENTONITE PELLETS TO 2.5' BGS SEALED WITH CEMENT GROUT								
26					INSTALLED WELL BOX + LOCKING CAP.								
27													
28													
29													
30													



Reference: Tetra Tech, Inc., 1993

GEOMATRIX

PREVIOUS SHALLOW GRAB GROUNDWATER RESULTS
JULY 1993 AND APRIL 1995
National Guard Organizational Maintenance Shop #35
San Lorenzo, California

Figure 4

Project No. 2868.03

2868.01.004

GEOMATRIX

TABLE 4

HISTORICAL WATER LEVEL MEASUREMENTS
National Guard Organizational Maintenance Shop
San Lorenzo, California

Well No.	Date	Depth Below TOC[1] (feet)	TOC Elevation (feet, msl[2])	Groundwater Elevation (feet, msl)
MW-1	11/22/94	8.92	35.53	26.61
	1/6/95	8.31	35.53	27.22
	4/20/95	5.12	35.53	30.41
	5/3/95	5.34	35.53	30.19
	6/9/95	6.14	35.53	29.39
	7/18/95	6.55	35.53	28.98
	8/11/95	7.13	35.53	28.40
	9/8/95	7.61	35.53	27.92
	8/9/96	6.73	35.53	28.80
MW-2	11/22/94	9.41	36.32	26.91
	1/6/95	8.50	36.32	27.82
	4/20/95	6.16	36.32	30.16
	5/3/95	6.13	36.32	30.19
	6/9/95	6.92	36.32	29.40
	7/18/95	7.47	36.32	28.85
	8/11/95	7.90	36.32	28.42
	9/8/95	8.38	36.32	27.94
	8/9/96	7.51	36.32	28.81
MW-3	11/22/95	7.89	34.54	26.65
	1/6/95	7.03	34.54	27.51
	4/20/95	4.55	34.54	29.99
	5/3/95	4.70	34.54	29.84
	6/9/95	5.51	34.54	29.03
	7/18/95	9.00	34.54	25.54
	8/11/95	6.48	34.54	28.06
	9/8/95	6.90	34.54	27.64
	8/9/96	6.10	34.54	28.44

Notes:

1 TOC = Top of casing (measuring point).
2 msl = Above mean sea level.

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GEOMATRIX

TABLE 2

MONITORING WELL ANALYTICAL RESULTS[1]
National Guard Organizational Maintenance Shop
San Lorenzo, California

Concentrations in micrograms per liter (µg/l)

Sample No.	Date Collected	TPHd[2]	TPHg[3]	Benzene	Toluene	Xylenes	Ethyl-benzene	MTBE[4]
MW-1	7/14/93	ND[5]	ND	ND	ND	ND	ND	NA[6]
	5/3/95	<50	<50	<0.5	<0.5	<0.5	<0.5	NA
	8/11/95	<50	<50	<0.5	<0.5	<0.5	<0.5	NA
	8/9/96	NA	<50	<0.5	<0.5	<0.5	<0.5	<5
MW-2	7/14/93	ND	ND	ND	ND	ND	ND	NA
	5/3/95	<50	<50	<0.5	<0.5	<0.5	<0.5	NA
	8/11/95	<50	<50	<0.5	<0.5	<0.5	<0.5	NA
	8/9/96	NA	<50	<0.5	<0.5	<0.5	<0.5	<5
MW-3	7/14/93	<200	4100	ND	ND	640	ND	NA
	5/3/95	<50	600	18	4.2	27	110	NA
	8/11/95	<50	710	11	3.2	23	110	NA
	8/9/96	NA	600	9.0	1.3	22	74	<5

Notes:

1 Chemical analyses performed by Chromalab, Inc., of Pleasanton, California. Laboratory analytical reports detailing the analyses performed, method detection limits for each constituent, and analytical results are included in Appendix A.
2 TPHd = total petroleum hydrocarbons as diesel. Analysis by modified EPA Method 8015.
3 TPHg = total petroleum hydrocarbons as gasoline. Analysis by modified EPA Method 8015.
4 MTBE = methyl tert butyl ether
5 ND = not detected at or above detection limit; detection limit for these samples is unknown. Sampling conducted and performed by TetraTech, Inc.
6 NA = not analyzed.

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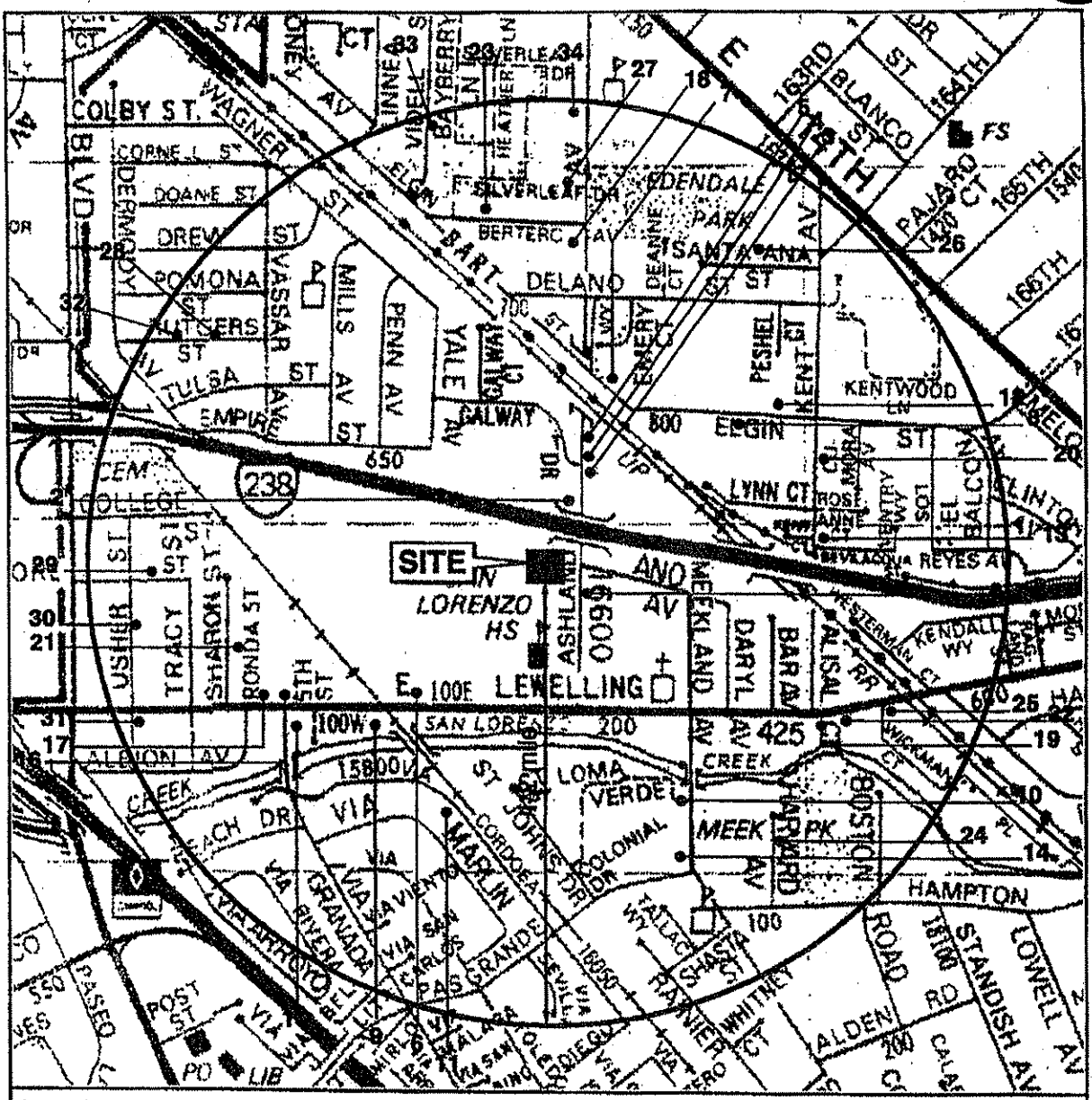
8



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EXPLANATION

21 ● Approximate location of well. See Table 5 for detailed information.

GEOMATRIX

WELL SURVEY
National Guard Organization Maintenance Shop No. 35
16501 Ashland Avenue
San Lorenzo, California

Figure 8

Project No. 2868

2868.03.006

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

January 14, 2003

Mr. Melguides F. Antonia D. Joscon
3110 Raleigh Ct.
Fremont, CA 94555

Subject: Fuel Leak Site Case Closure, Jascon Automotive Electric 17771 Meekland Ave., Hayward, CA,Case No.RO0000021;Underground Storage Tank Cleanup Fund No.

Dear Mr. Joscon:

This letter transmits the enclosed underground storage tank (UST) case closure letter in accordance with Chapter 6.75 (Article 4, Section 25299.37[h]). The State Water Resources Control Board adopted this letter on February 20, 1997. As of March 1, 1997, the Alameda County Environmental Health (ACEH) is required to use this case closure letter for all UST leak sites. We are also transmitting to you the enclosed case closure summary. These documents confirm the completion of the investigation and cleanup of the reported release at the subject site. The subject fuel leak case is closed.

SITE INVESTIGATION AND CLEANUP SUMMARY

Please be advised that the following conditions exist at the site:

- Residual soil pollution remains in place at this site.
- Analysis for Nickel was not performed on soil samples at the waste oil tank.

If you have any questions, please call Amir K. Gholami at (510) 567-6876. Thank you.

Sincerely,

Donna L. Drogos, P.E.
Supervising Hazardous Materials Specialist
Underground Storage Tank Local Oversight Program

Enclosures:
1. Case Closure Letter
2. Case Closure Summary

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
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January 14, 2003

Mr. Melguides F. Antonia D. Joscon
3110 Raleigh Ct.
Fremont, CA 94555

Subject: Fuel Leak Site Case Closure, Jascon Automotive Electric 17771 Meekland Ave., Hayward, CA,Case No.RO0000021;Underground Storage Tank Cleanup Fund No.

Dear Mr. Joscon:

This letter confirms the completion of a site investigation and remedial action for the underground storage tank(s) formerly located at the above-described location. Thank you for your cooperation throughout this investigation. Your willingness and promptness in responding to our inquiries concerning the former underground storage tank(s) are greatly appreciated.

Based on information in the above-referenced file and with the provision that the information provided to this agency was accurate and representative of site conditions, this agency finds that the site investigation and corrective action carried out at your underground storage tank(s) site is in compliance with the requirements of subdivisions (a) and (b) of Section 25299.37 of the Health and Safety Code and with corrective action regulations adopted pursuant to Section 25299.77 of the Health and Safety Code and that no further action related to the petroleum release(s) at the site is required.

This notice is issued pursuant to subdivision (h) of Section 25299.37 of the Health and Safety Code.

Please contact our office if you have any questions regarding this matter.

Sincerely,

Mee Ling Tung
Director
Alameda County Environmental Health

Summary of Production Wells in Vicinity: Summary of Production Wells in Vicinity: There are several 27domestic and irrigation wells identified within 2000 feet of the site:

- 03S02w18B4, 03S02W18F3, and 03S02W18F2, two irrigation wells and an abandoned well respectively, located downgradient, south to southwest.
- 03S02W18J7, an irrigation well, down gradient, southwest.
- Irrigation wells identified 03S02W18K1 & 03S02W18K3, both irrigation wells, down-gradient- southwest.
- 03S02W18G14, and 03S02W18G1, both irrigation wells, down-gradient-southwest.

These wells do not appear to be receptors due to their distance and location to the site.

Are drinking water wells affected? No	Aquifer Name: East Bay Plain
Is surface water affected? No	Nearest SW Name: San Lorenzo Creek about 1500 feet north
Off-Site Beneficial Use Impacts (Addresses/Locations): none identified	
Reports on file? Yes	Where are reports filed? Alameda County Environmental Health & Hayward Fire Department

TREATMENT AND DISPOSAL OF AFFECTED MATERIAL

Material	Amount (Include Units)	Action (Treatment or Disposal w/Destination)	Date
Tank	2 USTs @ 3,000, 1 @5,000, and 1 @ 300 gallons	Disposed at Erickson, Richmond, CA	1/04/1998
Piping	Not reported	Not reported assumed disposed with UST	1/04/1998
Free Product	Not reported	———	—
Soil	Not reported	———	———
Groundwater	Not reported	———	— —

MAXIMUM DOCUMENTED CONTAMINANT CONCENTRATIONSCBEFORE AND AFTER CLEANUP
(Please see Attachments for additional information on contaminant locations and concentrations)

	Soil (ppm)		Water (ppb)			Soil (ppm)		Water (ppb)	
Contaminant	Before	After	Before	After	Contaminant	Before	After	Before	After
TPH (Gas)	410	410	ND	290	Benzene	0.024	0.024	ND	10
TPH (Diesel)	57	57	ND	—	Toluene	1.3	1.3	ND	12
Oil & Grease	<50	<50	ND	—	Ethyl Benzene	2.9	2.9	ND	12
Heavy Metals	40*	40*	ND	—	Xylene	18	18	ND	59
Other (8010)	ND	—	—	—	MTBE	—	—	—	2

*0.8 ppm Cd, 29 Cr, <10 ppm Pb, 40 ppm Zn

VI. LOCAL AGENCY REPRESENTATIVE DATA

Prepared by: Amir K. Gholami	Title: Hazardous Materials Specialist
Signature:	Date: 12/24/02
Approved by: Donna L. Drogos, P.E.	Title: Supervising Hazardous Materials Specialist
Signature:	Date: 12/24/02

This closure approval is based upon the available information and with the provision that the information provided to this agency was accurate and representative of site conditions.

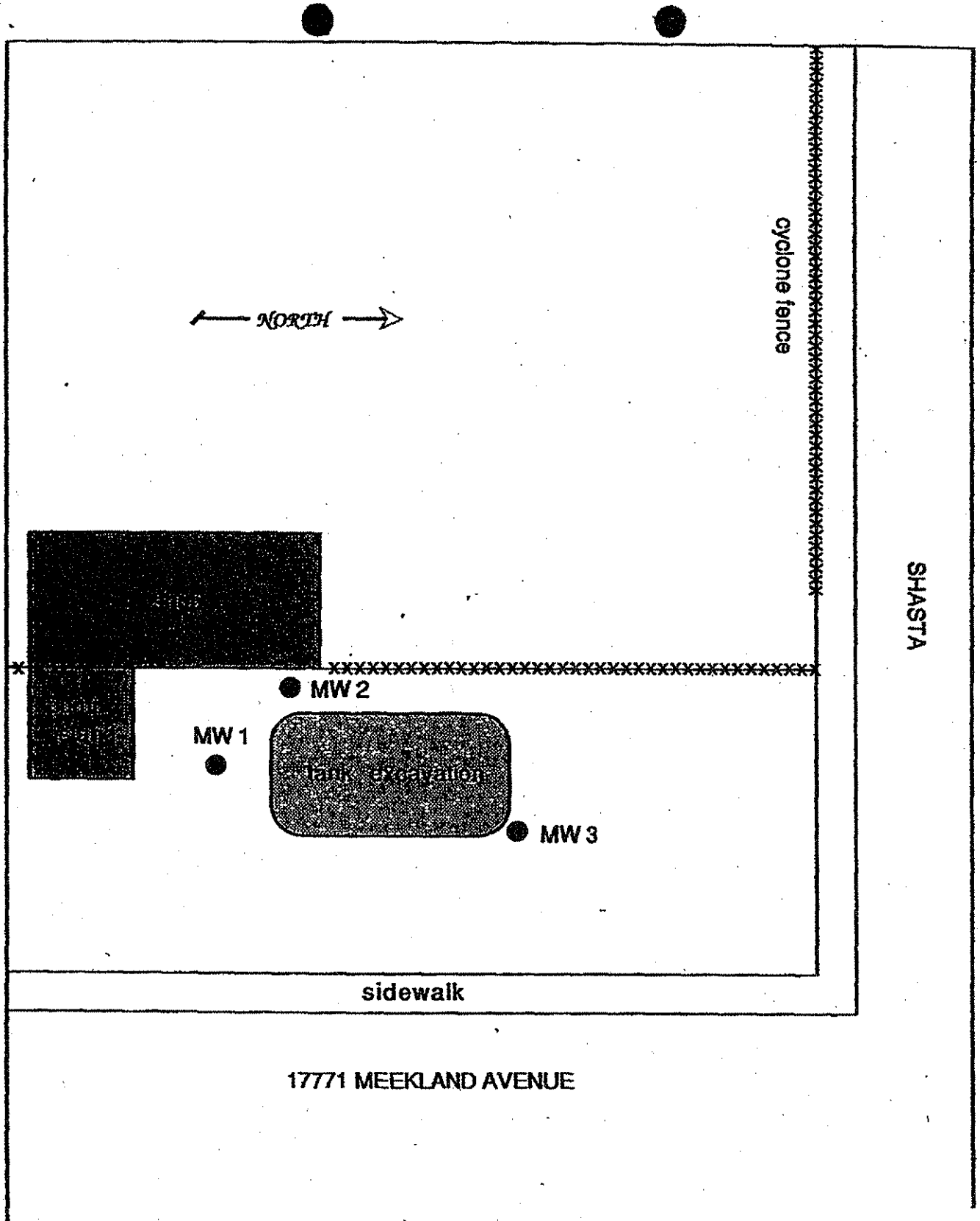
VII. REGIONAL BOARD NOTIFICATION

Regional Board Staff Name: Roger Brewer	Title: Associate Engineering Geologist
RB Response: Concur, based solely upon information contained in this case closure summary.	Date Submitted to RB: 12/30/02
Signature:	Date: 1/3/03

Attachments:

1 Site Vicinity Map
2 Monitoring Well and Soil Boring Location Map (2 pages)
3 Soil Analytical Results (6 pages)
4 Monitoring Well Analytical Results
5 Depth to Water Measurements
6 Soil and Water Analytical Results (2 pages)
7 Monitoring Well Construction
8 Monitoring Well Boring Logs (3 pages)

This document and the related CASE CLOSURE LETTER, shall be retained by the lead agency as part of the official site file.



ATTACHMENT 2

AUGEAS CORPORATION	Figure 2- Proposed Monitoring Well Locations	
	Jocson Auto Electric, Hayward, CA	06/03/92

SUPERIOR ANALYTICAL LABORATORIES, INC.
825 ARNOLD, STE. 114 • MARTINEZ, CALIFORNIA 94553 • (415) 229-1512
DOHS #319
DOHS #220

CERTIFICATE OF ANALYSIS

LABORATORY NO.: 82220
CLIENT: SEMCO
CLIENT JOB NO.: 17771 MEEKLD

DATE RECEIVED: 01/04/91
DATE REPORTED: 01/11/91

ANALYSIS FOR BENZENE, TOLUENE, ETHYL BENZENE & XYLENES
by EPA SW-846 Methods 5030 and 8020

LAB #	Sample Identification	Concentration (ug/Kg) Benzene	Toluene	Ethyl Benzene	Xylenes
1	1 NW 13'	4	ND<3	5	14
2	2 N 14'	ND<3	19	20	130
3	3 SW [redacted]	24	ND<3	10	23
4	4 S [redacted]	ND<30	1300	2900	18000
5	5 SE 14'8"	ND<3	3	ND<3	4
6	6 NE 15'	ND<3	5	ND<3	4
7	7 PIPE 2'1"	ND<3	9	ND<3	ND<3
8	8 WO 8'	ND<3	3	ND<3	ND<3

ug/Kg - parts per billion (ppb)

Method Detection Limit in [redacted]: 3 ug/Kg

QAQC Summary:

Daily Standard run at 20ug/L: RPD = <15%
MS/MSD Average Recovery = 102%; Duplicate RPD = <2

Richard Srna, Ph.D.

Laboratory Manager

ATTACHMENT 3

SUPERIOR ANALYTICAL LABORATORIES, INC.
825 ARNOLD, STE. 114 • MARTINEZ, CALIFORNIA 94553 • (415) 229-1512

DOHS #319
DOHS #220

CERTIFICATE OF ANALYSIS

LABORATORY NO.: 82220
CLIENT: SEMCO
CLIENT JOB NO.: 17771 MEEKLD

DATE RECEIVED: 01/04/91
DATE REPORTED: 01/11/91

ANALYSIS FOR TOTAL PETROLEUM HYDROCARBONS
by Modified EPA SW-846 Method 8015

LAB #	Sample Identification	Concentration (mg/Kg) [redacted]ange
1	1 NW 13'	ND<10
2	2 N 14'	ND<10
3	3 SW 15'	ND<10
4	4 B [redacted]	57*
5	5 SE 14'8"	ND<10
6	6 NE 15'	ND<10
7	7 PIPE 2'1"	ND<10
8	8 WO 8'	ND<10

* Non-typical diesel pattern.

Method Detection Limit for Diesel in [redacted]: 10 mg/Kg

QAQC Summary:

Daily Standard run at 200mg/L: RPD Diesel = 10
MS/MSD Average Recovery = 102%: Duplicate RPD = 2

Richard Srna, Ph.D.

Laboratory Manager

SUPERIOR ANALYTICAL LABORATORIES, INC.
825 ARNOLD, STE. 114 • MARTINEZ, CALIFORNIA 94553 • (415) 229-1512
DOHS #319
DOHS #220

CERTIFICATE OF ANALYSIS

LABORATORY NO.: 82220
CLIENT: SEMCO
CLIENT JOB NO.: 17771 MEEKLD

DATE RECEIVED: 01/04/91
DATE REPORTED: 01/11/91

ANALYSIS FOR TOTAL OIL AND GREASE
by Standard Method 5520F

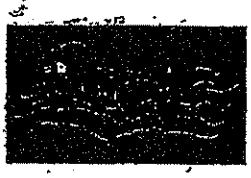
LAB #	Sample Identification	Concentration (mg/Kg)
8	8 MW 8'	ND<50

mg/Kg - parts per million (ppm)

Method Detection Limit for Oil and Grease in Soil: 50mg/Kg

QAQC Summary: Duplicate RPD : 11
MS/MSD Average Recovery : 73%

Richard Srna, Ph.D.
Laboratory Director



Jocson Auto Electric, 17771 Meekland, Alameda County, California

Table 1
Summary of Analytical Results

Boring No.	Fuel Hydrocarbons mg/kg	Benzene µg/kg	Toluene µg/kg	Ethyl benzene µg/kg	Xylenes µg/kg
MW-1-10'	ND	ND	ND	ND	ND
15'	ND	ND	ND	ND	ND
20'	ND	ND	ND	ND	ND
25'	ND	ND	ND	ND	ND
30'	ND	ND	ND	ND	ND
MW-2-10'	ND	ND	ND	ND	ND
15'	ND	ND	ND	ND	ND
20'	ND	ND	ND	ND	ND
25'	ND	ND	ND	ND	ND
30'	ND	ND	ND	ND	ND
MW-3-10'	ND	ND	ND	ND	ND
15'	ND	ND	ND	ND	ND
20'	ND	ND	ND	ND	ND
25'	ND	ND	ND	ND	ND
30'	ND	ND	ND	ND	ND
SB-1-10'	ND	ND	ND	ND	ND
15'	ND	ND	ND	ND	ND
20'	ND	ND	ND	ND	ND

TABLE 1
GROUNDWATER ELEVATION

Well Name	Elevation TOC[1] (Feet)	Date	Depth-to-Groundwater From TOC	Groundwater Elevation (Feet MSL[2])
MW-1	55.25[3]	07/01/92	19.11[4]	36.14
		07/12/94	17.78	37.47
		10/10/94	19.16	36.09
		01/13/95	15.50	39.75
MW-2	54.33[3]	07/01/92	20.02[4]	34.31
		07/12/94	18.67	35.66
		10/10/94	20.04	34.29
		01/13/95	16.43	37.90
MW-3	55.05[3]	07/01/92	19.26[4]	35.79
		07/12/94	17.92	37.13
		10/10/94	19.29	35.76
		01/13/95	15.68	39.37

[1] TOP-OF-CASING

[2] MEAN SEA LEVEL

[3] ELEVATION REPORTED BY PREVIOUS CONSULTANT (AUGEAS CORPORATION)

[4] REPORTED BY PREVIOUS CONSULTANT (AUGEAS CORPORATION)

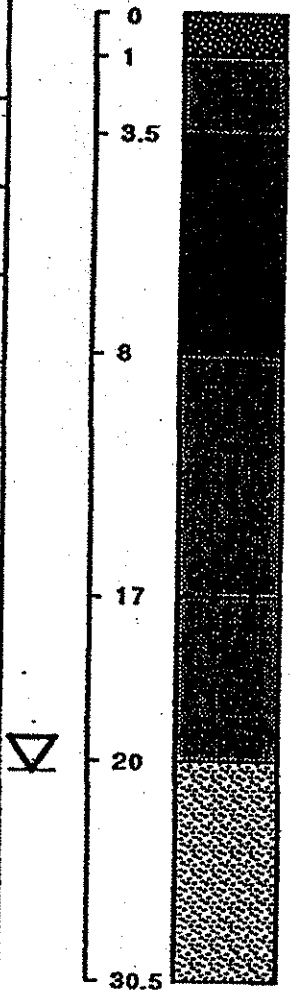
LOG OF BORING
MW-1

JOB NO. MJ 0592

CLIENT: JOCSON AUTO ELECTRIC

Date Drilled: 06/27/92
Well Casing Top Elevation: ___
Casing Diameter: 2"
Filter Pack Type: sand
Grout Type: cement/bentonite
Screen Size: 0.020
Boring Diameter: 6 7/8"

SAMPLER TYPE	SAMPLING RESISTANCE BLOWS/FT.	SAMPLE DEPTH	SOIL CLASSIFICATION
SS	2/5/6	5'	ML
SS	5/10/17	10'	CL
SS	4/4/4	15'	CL
SS	2/4/6	20'	ML
SS	1/3/6	25'	CL
SS	1/2/3	30'	CL



SOIL DESCRIPTION

- 0 – 1: Asphalt and base rock
- 1 – 3.5: Light brown clayey silt. Dry with no odor
- 3.5 – 8: Dark grey clayey SILT. Dry with no odor
- 8 – 17: Orange brown SILT with dark grey CLAY layers. Dry with no odor.
- 17 – 20: Light brown sandy SILT. Moist and soft. No odor.
- 20 – 30.5: Light grey-brown silty CLAY. Layers of brown silt. Damp with no odor.
- 30.5: Total depth 30.5'

BORING LOGGED BY: F.M.

AUGEAS CORPORATION

TITLE: MW-1 Boring Log

DRAWN BY:	DATE:	PROJECT NO.
JF	07/02/92	MJ0592

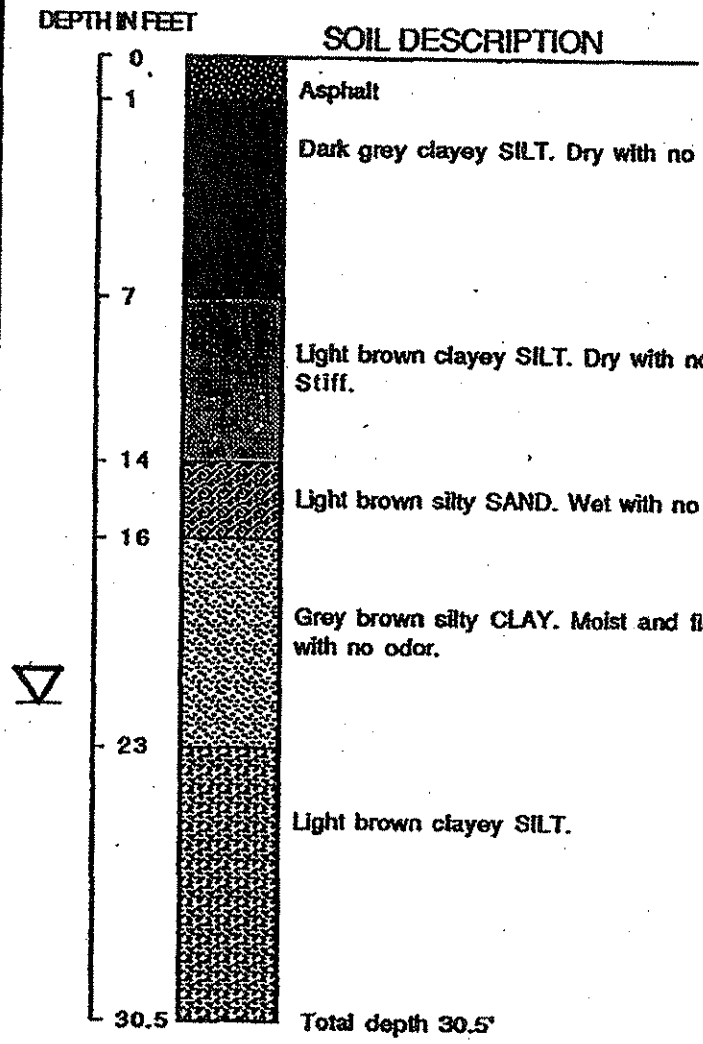
LOG OF BORING
MW-3

JOB NO. MJ 0592

CLIENT: JOCSON AUTO ELECTRIC

Date Drilled: 06/27/92
Well Casing Top Elevation: ____
Casing Diameter: 2"
Filter Pack Type: sand
Grout Type: cement/bentonite
Screen Size: 0.020
Boring Diameter: 6 7/8"

SAMPLER TYPE	SAMPLING RESISTANCE BLOWS/FT.	SAMPLE DEPTH	SOIL CLASSIFICATION
SS	2/5/6	5'	ML
SS	7/11/12	10'	ML
SS	3/5/6	15'	SM
SS	2/4/5	20'	CL
SS	2/3/3	25'	ML
SS	4/2/6	30'	ML



BORING LOGGED BY: F.M.

AUGEAS CORPORATION		
TITLE: MW-3 Boring Log		
DRAWN BY: JF	DATE: 07/02/92	PROJECT NO. MJ0592