

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
8-16 06

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

August 15, 2006

Manwel and Samira Shuwayhat
54 Wolfe Canyon Road
Kentfield, CA 94904

Subject: Fuel Leak Case No. RO0000324, Livermore Gas and Mini-mart, 160 Holmes Street, Livermore, CA

Dear Mr. and Ms. Shuwayhat:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the documents entitled, "Soil and Groundwater Investigation Report for Fuel Leak Case No. RO0000324," dated May 2, 2006, "Dual-Phase Extraction Pilot Test Report for Fuel Leak Case No. RO0000324," dated May 23, 2006, and "Interim Remediation of Groundwater for Fuel Leak Case No. RO0000324," dated August 8, 2006. The Soil and Groundwater Investigation Report presents the results from soil borings advanced in November 2005 and monitoring wells installed in February 2006. The Dual-Phase Extraction Pilot Test Report presents the results from one-day pilot DPE tests conducted at wells EW-1 and EW-2 on April 11 and 12, 2006. The Interim Remediation of Groundwater report presents a proposal to conduct interim groundwater extraction from wells EW-1 and EW-2.

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

TECHNICAL COMMENTS ON SOIL AND GROUNDWATER INVESTIGATION REPORT

1. **Plume Delineation.** Petroleum hydrocarbons were not detected in groundwater samples from downgradient monitoring well MW-5A. Based on these results, the Soil and Groundwater Investigation Report concluded that the distal edge of the hydrocarbon plume has been delineated. We concur that further investigation of the distal end of the plume is not required at this time. The results of quarterly groundwater monitoring are to be reviewed in order to evaluate the need for further plume delineation.
2. **Aquifer 2 Below the Regional Aquitard.** The regional aquitard was apparently encountered at depths of 54 to 69 feet below ground surface during the site investigation. The Soil and Groundwater Investigation Report recommends using data from the new monitoring well network to evaluate the vertical extent of dissolved contamination in Aquifer 1 over time prior to investigating Aquifer 2. We concur with review of data from the recently installed wells prior to proposing investigation of Aquifer 2. However, the lowermost grab groundwater sample collected from MB-1 at 70 feet bgs in November 2005 was apparently collected below the regional aquitard and contained 990 micrograms per liter ($\mu\text{g/L}$) of TPHg and 1,200 $\mu\text{g/L}$ of MTBE. If the regional aquitard is present at 58 feet bgs as indicated by the log from boring MW-1B, then the plume apparently extends below the regional aquitard into Aquifer 2. Please review these results along with data from the newly installed wells and present

recommendations regarding Aquifer 2 in the groundwater monitoring reports requested below.

3. **Cross Sections.** The incorporation of soil and groundwater data on the cross sections is useful for understanding the distribution of contamination with respect to the site geology. However, the data are difficult to read against the background of the symbols for fine- and coarse-grained material. In future reports where the cross sections are presented, please increase the size of the displayed data or use a different background for the geologic materials in order to make the data more readable on the cross sections.
4. **Quarterly Monitoring.** Please continue quarterly monitoring of the newly installed and existing monitoring wells. Groundwater samples are to be analyzed for TPHg, TPHd, BTEX, and fuel oxygenates ETBE, TAME, DIPE, TBA, ethanol, and methanol. Please present the results in the monitoring reports requested below.

TECHNICAL COMMENTS ON DUAL-PHASE EXTRACTION PILOT TEST REPORT

5. **Interim Dual-Phase Extraction.** Influent vapor samples collected during the dual-phase extraction (DPE) test contained low to not detected concentrations of petroleum hydrocarbons. We do not concur that long-term soil vapor extraction is likely to result in an increase in vapor concentrations and will effectively treat the source area. Based on the results of the DPE pilot test, it is not clear whether there is a significant source of hydrocarbons in the soil that requires soil vapor extraction or if a source exists, whether extraction wells EW-1 and EW-2 are in the proper locations to treat the source area. Therefore, we do not concur with the installation of an interim DPE system at this time. We request that you conduct additional investigation in the potential source area to assess whether a significant mass of hydrocarbons and fuel oxygenates are present in the soil, soil vapor, and shallow groundwater. Previous investigations have apparently focused on the perimeters of the property rather than the area of the former USTs, product lines, and dispensers. Therefore, please submit a Work Plan as requested below, to further investigate the potential source area.

TECHNICAL COMMENTS ON INTERIM GROUNDWATER EXTRACTION

6. **Interim Groundwater Extraction.** The August 8, 2006 document entitled, "Interim Remediation of Groundwater for Fuel Leak Case No. RO0000324," proposes limited interim groundwater extraction and treatment in order to initiate plume control. Groundwater will be extracted from wells EW-1 and EW-2 and treated at the surface prior to periodic discharge to the sanitary sewer. The proposal is acceptable to initiate plume control.

TECHNICAL REPORT REQUEST

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

- **October 18, 2006** – Work Plan for Source Area Investigation
- **November 15, 2006** - Quarterly Monitoring Report for the Third Quarter 2006

- **February 15, 2007 - Quarterly Monitoring Report for the Fourth Quarter 2006**

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. ACEH notes the discussion of UST Cleanup Fund cost pre-approval in your December 23, 2005 correspondence.

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street
Pleasanton, CA 94566

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

James Allen, Allterra Environmental, Inc., 849 Almar Avenue, Suite C, No. 281
Santa Cruz, CA 95060

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
8-16-06

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-8577
(510) 567-6700
FAX (510) 337-9335

August 15, 2006

Mo Mashhoon
Mash Petroleum, Inc.
5725 Thornhill Dr.
Oakland, CA 94611

Dear Mr. Mashhoon:

Subject: Fuel Leak Case No. RO0000317; Mash Petroleum, 5725 Thornhill Dr.,
Oakland, CA 94611

Alameda County Environmental Health staff has reviewed "Additional Soil and Groundwater Investigation and Monitoring Well Installation Report" dated June 13, 2005 by SOMA Environmental Engineering, Inc. (SOMA). The work consisted mainly of a CPT/MIP borehole study. We request that you address the following technical comments, and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) CPT-6 not installed - The proposed location is just upgradient from Temescal Creek and boring BH-C sampled September 6, 2000, detected 25,000 ug/l TPH-Diesel, 7,300 ug/l TPH-Gasoline, and 5,300 ug/l MTBE. Nor was a soil borehole log provided. Please explain why "Previously planned CPT-6 could not be drilled due to the physical constraints and obstruction of local traffic." Also, please include in a supplemental workplan, an alternative drilling method for this location or propose alternative boring locations.
- 2) MIP charts did not identify the corresponding CPT/MIP borings - Please label MIP charts with their corresponding CPT/MIP boring number.
- 3) No soil samples for analyses were collected from the CPT/MIP borings - Yet, MIP charts showed contaminant peaks. Please include in a supplemental workplan, a proposal to collect soil samples from the CPT/MIP borings.
- 4) Cross-sections did not show contaminant data for soil nor groundwater samples, preferential pathways, the underground storage tank pit, and borings BH-A - BH-E - Please include in a supplemental workplan, a proposal to include contaminant data for soil and groundwater samples, preferential pathways, the underground storage tank pit, and borings BH-A - BH-E.

Mr. Mashhoon
August 15, 2006
Page 2 of 2

OTHER COMMENTS

- 5) Perjury Statement - All work plans, technical reports, or technical documents submitted to this office must be accompanied by a cover letter from the responsible party that states, at a minimum, the following:

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

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

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang) by:

October 31, 2006 - Supplemental Workplan, 3rd Quarter 2006 Groundwater Monitoring Report

January 31, 2007 - 4th Quarter 2006 Groundwater Monitoring Report

April 30, 2007 - 1st Quarter 2007 Groundwater Monitoring Report

July 31, 2007 - 2nd Quarter 2007 Groundwater Monitoring Report

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

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Mansour Sepehr, SOMA Environmental Engineering, Inc., 2680 Bishop Drive,
Suite 203, San Ramon, CA 94583
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
04-11-05

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

April 7, 2005

Mo Mashhoon
Mash Petroleum, Inc.
5725 Thornhill Dr.
Oakland, CA 94611

Dear Mr. Mashhoon:

Subject: Fuel Leak Case No. RO0000317; Mash Petroleum, 5725 Thornhill Dr.,
Oakland, CA 94611

Alameda County Environmental Health staff has reviewed "Work Plan for Soil and Groundwater Investigation and Monitoring Well Installation Report" dated November 29, 2004 and the facsimile "Additional CPT is proposed between CPT-8 and CPT-9" dated April 1, 2005, both by SOMA Environmental Engineering, Inc. (SOMA). The workplan proposes drilling cone penetrometer test (CPT) and membrane interface probe (MIP) boreholes. The latter document was provided in response to our request for additional borings to delineate the vertical extent of soil contamination by the waste oil underground storage tank and to have a transect of borings to characterize the contaminant plume. Locations for additional borings, CPT-8, CPT-9, CPT-10, and CPT-11, were proposed. We approve of the workplan with the supplemental proposal. We request that you perform the proposed work, address the following technical comments, and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) Monitoring wells soil borehole logs - None provided. Please provide.

OTHER COMMENTS

- 2) Perjury Statement - All work plans, technical reports, or technical documents submitted to this office must be accompanied by a cover letter from the responsible party that states, at a minimum, the following:
"I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge."

Mr. Mashhoon
April 7, 2005
Page 2 of 2

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

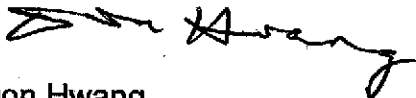
TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang) by:

April 30, 2005 - 1st Quarter 2005 Groundwater Monitoring Report
June 7, 2005 - Soil and Water Investigation Report
July 31, 2005 - 2nd Quarter 2005 Groundwater Monitoring Report
October 31, 2005 - 3rd Quarter 2005 Groundwater Monitoring Report
January 31, 2006 - 4th Quarter 2005 Groundwater Monitoring Report

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

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Mansour Sepehr, SOMA Environmental Engineering, Inc., 2680 Bishop Drive,
Suite 203, San Ramon, CA 94583
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SCW
10-13-04

October 13, 2004

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

Mo Mashhoon
Mash Petroleum, Inc.
5725 Thornhill Dr.
Oakland, CA 94611

Dear Mr. Mashhoon:

Subject: Fuel Leak Case No. RO0000317; Mash Petroleum, 5725 Thornhill Dr.,
Oakland, CA 94611

Alameda County Environmental Health staff has reviewed "Soil and Groundwater Investigation and Monitoring Well Installation Report" dated April 16, 2004 by SOMA Environmental Engineering, Inc. (SOMA). We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) Monitoring Well SOMA-1 was not installed at the approved location - A location by borehole BH-C and Temescal Creek was proposed in "Workplan for a soil and ground water assessment" dated March 22, 2002 by Aqua Science Engineers, Inc., instead, SOMA-1 was installed by and southeast of the tank pit. Submit a Work Plan with a proposal for the construction of the monitoring well to be installed, borehole installation, soil logging and sampling procedures incorporating the following comments.
- 2) Monitoring well screen lengths - Future monitoring well screen lengths will need to be depth discrete, generally, screened intervals of 3 to 5 feet in length. Please include in the Work Plan.
- 3) Monitoring wells borehole soil sampling - None collected although proposed. Borehole soil samples ought to have been sampled.
- 4) Monitoring wells soil borehole logs - None provided. Please provide.
- 5) Groundwater elevations/depth to water (DTW) -
 - a) For the monitoring wells, only ground water elevations were provided. Please provide DTW in the "Ground water Analytical Data" tables.
 - b) For the boreholes HP-1 through HP-7, HP9 and HP-10, only first encountered ground water elevations were provided. Stabilized ground water elevations are required.
- 6) Preferential Pathway Survey - We request that you perform a preferential

pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site.

- a) Utility Survey - Please submit map(s) and cross-sections showing the location and depth of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s). Evaluate the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers. Please submit with the Work Plan requested below.
 - b) Well Survey - Locate wells within a quarter mile radius of the site. Show the location of the wells and the site on a map and tabulate well construction details for each well. Please submit with the Work Plan requested below.
- 7) Historical hydraulic gradients - Please show using a rose diagram with magnitude and direction; include cumulative groundwater gradients in all future reports submitted for this site.
 - 8) Comparing the groundwater elevation with that of Temescal Creek's surface-water elevation - That the elevation of the groundwater in close proximity of Temescal Creek is identical to the surface elevation of the Temescal Creek indicates that the groundwater may be hydraulically connected to Temescal Creek. However, SOMA's assertion that the groundwater elevation would fall significantly below the surface water elevations of Temescal Creek is unsubstantiated.
 - 9) Source Characterization - Up to 4,200 mg/kg Total Petroleum Hydrocarbons-Motor Oil (TPH-MO), 2,700 mg/kg TPH-Diesel (TPH-D), and 1,100 mg/kg TPH-Gasoline (TPH-G) were detected beneath the waste oil underground storage tank. Thus, the source area has not been vertically delineated. We request that you propose additional borings to delineate the vertical extent of soil contamination in the source area in the Work Plan requested below.
 - 10) Site Characterization - Up to 25,000 micrograms/liter (ug/l) TPH-D, and 7,300 ug/l TPH-G, have been detected in the furthest downgradient groundwater sample, BH-C. The lateral extent of your dissolved contaminant plume is undefined. Please propose additional sampling locations to define the plumes associated with your site in the Work Plan requested below. Include geologic cross-sections and show soil and groundwater analytical results, utility conduits, well screens, etc., and explain your rationale for the additional sampling locations. You may want to consider performing an investigation to quickly define the location of the contaminant plume downgradient from the release site prior to installing the permanent monitoring network. That will allow you to optimize the location and depth of the permanent wells, thereby reducing the cost of the monitoring work. Collection of groundwater samples using a one-time direct push water sampling tool would be appropriate for this investigation.

Mr. Mashhoon
October 13, 2004
Page 3 of 3

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang) by:

December 13, 2004 - Work Plan

December 13, 2004 - DTW in the "Ground water Analytical Data" tables

January 31, 2005 - 4th Quarter 2004 Groundwater Monitoring Report

60 days after Work Plan approval - Soil and Water Investigation Report

April 30, 2005 - 1st Quarter 2005 Groundwater Monitoring Report

July 31, 2005 - 2nd Quarter 2005 Groundwater Monitoring Report

October 31, 2005 - 3rd Quarter 2005 Groundwater Monitoring Report

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

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Mansour Sepehr, SOMA Environmental Engineering, Inc., 2680 Bishop Drive,
Suite 203, San Ramon, CA 94583
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENT
02-03-04

February 3, 2004

Mo Mashhoon
Mash Petroleum, Inc.
5725 Thornhill Dr.
Oakland, CA 94611

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

Dear Mr. Mashhoon:

Subject: Fuel Leak Case No. RO0000317; Mash Petroleum, 5725 Thornhill Dr.,
Oakland, CA 94611

Alameda County Environmental Health staff has reviewed "Addendum to the Approved Workplan" dated December 29, 2003 and "Second Addendum to the Approved Workplan" dated January 29, 2004, both by Soma Environmental Engineering, Inc. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

The addendums to the workplan are approved subject to the following changes:

Boring Sampling - In addition to sampling at the interface between the groundwater and the unsaturated soils, sampling will also be required at changes of lithology, and at areas of obvious contamination, with a minimum of a soil sample every 5 ft. Also, the depths of the boreholes will be expected to be a minimum of 25 - 30 ft.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang) by:

April 3, 2004 Soil and Water Investigation Report

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

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Soma Environmental Engineering, Inc., 2680 Bishop Drive, Suite 203, San Ramon, CA
94583
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



09-0802

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

September 3, 2002

Mo Mashhoon
Mash Petroleum, Inc.
5725 Thornhill Dr.
Oakland, CA 94611

Dear Mr. Mashhoon:

Subject: Fuel Leak Case No. RO0000317; Mash Petroleum, 5725 Thornhill Dr.,
Oakland, CA 94611

Alameda County Environmental Health staff has reviewed "Workplan for Soil & Groundwater Assessment" dated March 22, 2002 by Aqua Science Engineers, Inc. The workplan proposes to install three groundwater monitoring wells and destroy the three tank backfill wells.

TECHNICAL COMMENTS

1) The workplan is approved subject to the following changes:

For soil and groundwater samples, in addition to the analyses proposed, Total Petroleum Hydrocarbon (Gasoline) [TPH-G], TPH-Diesel, TPH-Motor Oil, Benzene, Toluene, Ethylbenzene, Xylene (BTEX), and Methyl Tertiary-Butyl Ether (MTBE), analyses will also be required for Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), Tertiary Butyl Alcohol (TBA), Ethylene Dibromide (EDB), Ethylene Dichloride (EDC), and Ethanol, by EPA Method 8260 for soil and 524.2/624 (8260) for water.

2) Missing the report of the drilling of boring BH-D and BH-E on October 23, 2000.

TECHNICAL REPORT REQUEST

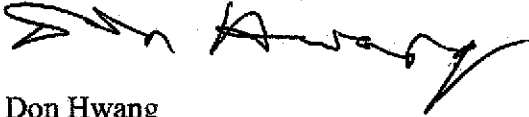
Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang) by November 3, 2002:

- 1) Report of soil and groundwater assessment
- 2) Report of borings BH-D and BH-E

Mr. Mashhoon
September 3, 2002
Page 2 of 2

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

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hwang", written in a cursive style.

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Robert Kitay, Aqua Science Engineers, Inc., 208 W. El Pintado Rd., Danville, CA 94526

File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



9-5-02

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

September 3, 2002

Mo Mashhoon
Mash Petroleum, Inc.
5725 Thornhill Dr.
Oakland, CA 94611

Dear Mr. Mashhoon:

Subject: Fuel Leak Case No. RO0000317; Mash Petroleum, 5725 Thornhill Dr.,
Oakland, CA 94611

My letter to you dated August 30, 2002 regarding "Workplan for Soil & Groundwater Assessment" dated March 22, 2002 by Aqua Science Engineers, Inc., omitted Methyl Tertiary-Butyl Ether (MTBE) as one of your proposed analyses. We do want analyses to include MTBE. Therefore, I am sending you another letter dated September 3, 2002, which responds to the aforementioned workplan, so please disregard my letter of August 30, 2002.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Robert Kitay, Aqua Science Engineers, Inc., 208 W. El Pintado Rd., Danville, CA 94526

File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



9-3-02

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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FAX (510) 337-9335

August 30, 2002

Mo Mashhoon
Mash Petroleum, Inc.
5725 Thornhill Dr.
Oakland, CA 94611

Dear Mr. Mashhoon:

Subject: Fuel Leak Case No. RO0000317; Mash Petroleum, 5725 Thornhill Dr.,
Oakland, CA 94611

Alameda County Environmental Health staff has reviewed "Workplan for Soil & Groundwater Assessment" dated March 22, 2002 by Aqua Science Engineers, Inc. The workplan proposes to install three groundwater monitoring wells and destroy the three tank backfill wells.

TECHNICAL COMMENTS

- 1) The workplan is approved subject to the following changes:
For soil and groundwater samples, in addition to the analyses proposed, Total Petroleum Hydrocarbon (Gasoline) [TPH-G], TPH-Diesel, TPH-Motor Oil, Benzene, Toluene, Ethylbenzene, and Xylene (BTEX), analyses will also be required for Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), Tertiary Butyl Alcohol (TBA), Ethylene Dibromide (EDB), Ethylene Dichloride (EDC), and Ethanol, by EPA Method 8260 for soil and 524.2/624 (8260) for water.
- 2) Missing the report of the drilling of boring BH-D and BH-E on October 23, 2000.

TECHNICAL REPORT REQUEST

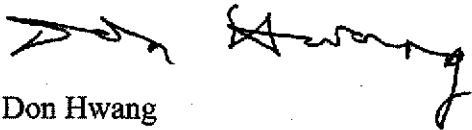
Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang) by October 30, 2002:

- 1) Report of soil and groundwater assessment
- 2) Report of borings BH-D and BH-E

Mr. Mashhoon
August 30, 2002
Page 2 of 2

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

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hwang". The signature is written in a cursive style with a long, sweeping underline.

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Robert Kitay, Aqua Science Engineers, Inc., 208 W. El Pintado Rd., Danville, CA 94526

File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Green
06-11-01

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

June 8, 2001

Mo Mashhoon
Mash Petroleum, Inc.
5725 Thornhill Dr.
Oakland, CA 94611

Re: Mash Petroleum, 5725 Thornhill Dr., Oakland, CA 94611
RO0000317

Dear Mr. Mashhoon:

A water sample collected from Temescal Creek on December 5, 2000 and analyzed for total petroleum hydrocarbons as gasoline (TPH-G), TPH-diesel (TPH-D), TPH-motor oil (TPH-MO), benzene, toluene, ethyl benzene, xylene (BTEX), and methyl tertiary-butyl ether (MTBE), was nondetectable for all these constituents. Prior to this, on September 6, 2000, soil and groundwater samples were collected from two borings. Boring BH-B located at the property line downgradient from the underground tanks and the dispensers, had the following soil contaminants: 240 mg/kg TPH-G, 370 mg/kg TPH-D, 0.043 benzene, 0.13 ethyl benzene, and the following groundwater contaminants: 12,000 ug/l TPH-G, 11,000 ug/l TPH-D, 420 ug/l TPH-MO, 44 ug/l benzene, 360 ug/l ethyl benzene, 49 ug/l xylene, 4,300 ug/l MTBE. Boring BH-C located offsite and further downgradient and on the upgradient side of Temescal Creek had the following soil contaminants: none greater than the detection limits, and the following groundwater contaminants: 7,300 ug/l TPH-G, 25,000 ug/l TPH-D, 620 ug/l TPH-MO, 5,300 ug/l MTBE.

Additional work is required to delineate the extent of the release from the underground storage tank/s and to install groundwater monitoring wells. Also, destruction of the wells, MW-1, MW-2, and MW-3, in the underground tank pit, is required to prevent surface contamination from reaching the subsurface. Submit a workplan to meet these needs. If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist

C: Robert Kitay, Aqua Science Engineers, Inc., 208 W. El Pintado Rd., Danville, CA 94526

File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 6-26-2000

20317

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

June 23, 2000

Mo Mashhoon
Mash Petroleum, Inc.
5725 Thornhill Dr.
Oakland, CA 94611

Re: 5725 Thornhill Dr., Oakland, CA 94611
Stid 1145

Dear Mr. Mashhoon:

On May 19, 2000, Larry Seto and Eva Chu from our office and I met your consultant, Robert Kitay, Aqua Science Engineers, at the site. We determined that two more borings would be required, at the southwest corner of the property and on the sidewalk south of the property to assess the nature and vertical and lateral extent of the release from the waste oil tank. Additionally, as requested in my letter dated April 27, 1999, the destruction of the wells, MW-1, MW-2, and MW-3, in the underground tank trenches, is required to prevent surface contamination from reaching the subsurface.

A workplan addressing these issues is required. If you have any questions, please call me at (510) 567-6746.

Sincerely,


Don Hwang
Hazardous Materials Specialist

C: Robert Kitay, Aqua Science Engineers, Inc., 208 W. El Pintado Rd., Danville, CA 94526
File

L.S.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0317

ENVIRONMENTAL HEALTH SERVICES

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

June 11, 1999

Mo Mashhoon
Mash Petroleum, Inc.
5725 Thornhill Dr.
Oakland, CA 94611

Re: 5725 Thornhill Dr., Oakland, CA 94611
Stid 1145

Dear Mr. Mashhoon:

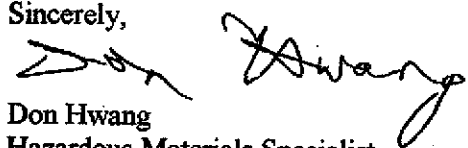
A letter dated April 27, 1999, was sent to you requesting a workplan which includes:

- 1) Analyses of soil samples for metals: cadmium, chromium, lead, zinc, nickel; polychlorinated biphenyl, pentachlorophenol, polynuclear aromatics, and creosote.
- 2) Analyses of soil samples for chlorinated hydrocarbons.
- 3) The destruction of monitoring wells, MW-1, MW-2, and MW-3, to prevent surface contamination from reaching the subsurface. Also, these wells are not relevant for determining the extent of the leak from the waste oil tank.
- 4) The installation of groundwater monitoring wells to assess the nature and vertical and lateral extent of the release from the waste oil tank.

A workplan addressing these issues is required within 30 days. This letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267(b) and Health and Safety Code Section 25299.37 and 25299.7. You are further advised that failure to comply may subject you to penalties of up to \$5000 per tank per day.

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

Sincerely,



Don Hwang
Hazardous Materials Specialist

C: Robert Kitay, Aqua Science Engineers, Inc., 208 W. El Pintado Rd., Danville, CA 94526
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 317

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

March 25, 1999

Mo Mashhoon
Mash Petroleum, Inc.
5725 Thornhill Dr.
Oakland, CA 94611

Re: 5725 Thornhill Dr., Oakland, CA 94611
Stid 1145

Dear Mr. Mashhoon:

The report, "February 24, 1999, Groundwater Monitoring Well Sampling and Confirmation Soil Collection Report, ASE Job No. 3457 at Mash Petroleum Site, 5725 Thornhill Dr., Oakland, CA" prepared by Aqua Science Engineers, Inc., was reviewed. This was the only report in the "Leaking Underground Storage Tank Oversight Program" file. Contrary to the report's conclusion, this case cannot be closed because information is lacking.

"Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, Appendix A" should be used as a guide to insure that all relevant information is provided. The following information was missing and is required for an initial evaluation:

- 1) Site use history.
- 2) Vicinity hydrogeologic description.
- 3) Underground tanks: number, description, contents, etc. Include information for removed and existing tanks.
- 4) Underground tanks leak history.
- 5) Underground tanks removal observations.
- 6) Previous subsurface work and results.
- 7) Soil and groundwater sampling of the tank excavations immediately after the removal of the underground tanks.
- 8) Disposal records for the underground tanks and contaminated soil and water.
- 9) Well logs.

Also, before any field work is initiated, a workplan should be submitted and approved. There is no record that the work performed in the report reviewed was approved by this agency.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist

C: Robert Kitay, Aqua Science Engineers, Inc., 208 W. El Pintado Rd., Danville, CA 94526

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20317

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

May 21, 1999

Mo Mashhoon
Mash Petroleum, Inc.
5725 Thornhill Dr.
Oakland, CA 94611

Re: 5725 Thornhill Dr., Oakland, CA 94611
Stid 1145

Dear Mr. Mashhoon:

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

This letter is to inform you of new legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, you have been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.

Mr. Mashhoon
Page 2 of 2
May 21, 1999

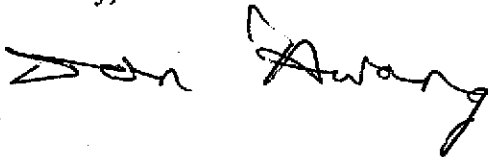
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

You may use the enclosed "notice of proposed action" form (sample letter 3) as a template to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

Please call me at (510) 567-6746 should you have any questions about the content of this letter.

Sincerely,



Don Hwang
Hazardous Materials Specialist

Enclosures

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0 #317

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

April 27, 1999

Mo Mashhoon
Mash Petroleum, Inc.
5725 Thornhill Dr.
Oakland, CA 94611

Re: 5725 Thornhill Dr., Oakland, CA 94611
Stid 1145

Dear Mr. Mashhoon:

The submittal dated April 12, 1999, which included "Underground Waste Oil Tank Removal Final Report... prepared by Penn Environmental, Dec. 19, 1998", and additional information regarding the site was reviewed.

The following problems remain:

- 1) None of the soil samples were analyzed for metals: cadmium, chromium, lead, zinc, nickel; polychlorinated biphenyl, pentachlorophenol, polynuclear aromatics, and creosote.
- 2) The soil samples collected beneath the underground tanks weren't analyzed for chlorinated hydrocarbons.
- 3) The groundwater samples collected from monitoring wells, MW-1, MW-2, and MW-3, are not relevant for determining the extent of the leak from the waste oil tank. The wells are in the backfill of the gasoline tanks, and all are located in the same direction, which may not be downgradient from the waste oil tank excavation. We concur with Aqua Science Engineers, Inc., that these wells ought to be destroyed to prevent surface contamination from reaching the subsurface.

Therefore, the analyses listed, and additional soil and groundwater investigation are required. The necessity for additional investigation is based on the two soil samples collected beneath the waste oil tank: Total Petroleum Hydrocarbons-Gasoline (TPH-G) 440 & 1100 mg/kg, TPH-Diesel (TPH-D) 1200 & 2700 mg/kg, TPH-Motor Oil (TPH-MO) 820 & 4200 mg/kg. A workplan addressing these issues needs to be submitted.

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

Sincerely,

Don Hwang
Hazardous Materials Specialist

C: Robert Kitay, Aqua Science Engineers, Inc., 208 W. El Pintado Rd., Danville, CA 94526
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO 317

RAFAT A. SHAHID, Assistant Agency Director

December 28, 1993

CERTIFIED MAILER #:P 386 338 271

Montclair Automotive Service
5725 Thornhill Dr.
Oakland, 94611

UGTID:1145

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

**Re: FIVE-YEAR PERMITS FOR OPERATION OF UNDERGROUND STORAGE TANK(S)
5725 Thornhill Dr. Oakland, 94611**

Dear Owner/Operator:

According to our records your facility referenced above has not received a five-year permit to operate UST's. In order to obtain a permit you must complete the following items marked below and return them within 30 DAYS. The necessary forms are enclosed. You may complete a "Consolidated Underground Tank Management Plan" which will assist you in preparing a monitoring plan, site plot plan and spill response plan for your tank(s). If supplemental information or forms are required, please submit it to this office with the completed questionnaire and application forms:

- ___ 1. An accurate and complete plot plan.
- ___ 2. A written spill response plan. (enclosed)
- ___ 3. A written tank monitoring plan. (enclosed)
- ___ 4. Results of precision tank test(s), (initial and annual).
- ___ 5. Results of precision pipeline leak detector tests (initial and annual).
- ___ 6. Complete UST PERMIT FORM A-one per facility. (enclosed)
- ___ 7. Complete UST PERMIT FORM B-one per tank. (enclosed)
- ___ 8. Complete UST PERMIT FORM C-one per tank if information is available. (enclosed)
- ___ 9. Letter stating how the tank is to be maintained during one year closure.

Be advised that Title 23 of the California Code of Regulation prohibits the operation of "ANY" UST without a permit. If our records are in error, you must contact this office immediately TO AVOID POSSIBLE ENFORCEMENT ACTION. Please feel free to contact this office at (510) 271-4320; to answer any questions which may arise in completing the mandatory five-year permit process. Be prepared to provide your zip code to speak with the Hazmat Specialist handling your case.

Sincerely,

Brian Oliva
HazMat Specialist

c: Edgar Howell, Chief, Hazardous Materials Div. (files)