

GIBSON, DUNN & CRUTCHER LLP

R0320

LAWYERS

A REGISTERED LIMITED LIABILITY PARTNERSHIP
INCLUDING PROFESSIONAL CORPORATIONS

1050 Connecticut Avenue, N.W. Washington, D.C. 20036-5306

(202) 955-8500

www.gibsondunn.com

SBoothc@gibsondunn.com

October 2, 2007

Direct Dial

(202) 887-3627

Fax No.

(202) 530-4229

Client No.

C 35750-00004

VIA U.S. MAIL

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

Re: *Case No. R00000320 Work Plan Request*

Dear Mr. Wickham:

On behalf of our client, Grundfos CBS, Inc. and their subsidiary, Paco Pumps (collectively "Grundfos"), I am writing to request an extension for providing work plans and requested information in the above-referenced matter.

In your letter of August 21, 2007, you requested an updated work plan and certain information, including reports and internal correspondence, for your case file by October 22, 2007. Unfortunately, as I mentioned during our telephone conversation last week, Grundfos did not receive this notice until September 24, 2007. We are currently in the process of investigating the matter and determining the extent of Grundfos's responsibility, if any, for this remediation. Accordingly, we respectfully request a ninety-day extension to gather the information and determine our responsibility vis-à-vis the other owners and operators at the site.

RECEIVED
OCT 2 2007
ENVIRONMENTAL HEALTH SERVICES

GIBSON, DUNN & CRUTCHER LLP

Jerry Wickham
October 2, 2007
Page 2

Please let me know if you have any questions. We look forward to your response.

Sincerely,



Stacie L. Boothe

cc: Stephan Haimo
Raymond B. Ludwiszewski
Charles H. Haake

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OCT 2 2007
GIBSON, DUNN & CRUTCHER LLP

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0320

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

August 21, 2007

Mr. John Lilla
PACO Pumps, Inc.
16801 Greenspoint Park Drive
Houston, TX 77060

Mr. Harold Vignoles
9201 San Leandro LLC
9201 San Leandro Street
Oakland, CA 94603

Mr. Dallas Nelson
GP Holdings LLC
P.O. Box 14046
Oakland, CA 94614

Dear Mr. Lilla, Mr. Vignoles, and Mr. Nelson:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site. Two underground storage tanks (UST) were believed to be present at the site; however, there does not appear to be a record of either tank being removed. Soil was excavated in the suspected location of a former 550-gallon UST (southeast of the former Manufacturing, Engineering, & Storage Building) in 1992. During the excavation, no UST was found but possible fill, piping, and tank debris was observed. Petroleum hydrocarbons were detected in soil in the area of the excavation. Total petroleum hydrocarbons as gasoline (TPHg) and benzene have been detected in groundwater in the area of the former UST at concentrations up to 19,000 and 9,000 micrograms per liter (μL), respectively. A second UST was suspected in the area of a former steel building; however, no reports exist in ACEH files to document removal of the UST.

Polychlorinated biphenyls (PCBs) have been detected in soil in the northwestern portion of the site. The PCBs apparently remain in place below an asphalt cover.

A soil investigation and removal was conducted in an area adjacent to the Central Pacific Railroad tracks in 1987. The 1987 investigation and soil removal was apparently conducted without regulatory oversight. During the 1987 excavation, oily water, heavy hydrocarbon odor, and various debris were observed. We request that you **prepare a Work Plan by October 22, 2007** to address the technical comments below and to complete characterization of the site.

REQUEST FOR INFORMATION

We request that you submit copies of any the following reports, which are reference but are not in the ACEH case file:

- Cutcliffe, S., 1987. Findings and Results of the Cleanup Project Performed on 14 and 15 December 1987 at PACO Oakland Site.
- Dames & Moore, 1987. Site Contamination Study – PACO Pumps Facility, Oakland, for Amsted Industries.

Mr. John Lilla
Mr. Harold Vignoles
Mr. Dallas Nelson
RO0000320
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Page 2

- Ecology and Environment Inc., 1985. CERCLA Site Inspection, PACO Pumps 845 92nd Avenue, Oakland, CA. Site ERRIS #CAD 088772629, Inspection ID# C(85)C371, Date of Inspection 9/17/85, Report Due November 8, 1985.
- Jonas & Associates, Inc., 1991. Soil Characterization Report Stained Asphalt/Concrete Area – PACO Pumps, 9201 San Leandro Street, Oakland, CA, October 30, 1991.
- Van Aken, B., 1987. Internal PACO Correspondence to Mr. John G. Terranova regarding excavation, November 4, 1987.

TECHNICAL COMMENTS

1. **1992 UST Excavation.** Multiple phases of soil excavation were conducted between June and August 1992 to locate a former 550-gallon UST and remove contaminated soil in the area southeast of the former Quality Control Room and Casting Storage. No UST was encountered but possible fill, piping, and tank debris was observed during the excavation. Figure 5-2 of the report entitled, "Site Characterization Report and Work Plan," by Jonas & Associates and dated October 16, 1992, shows piping extending from the center of the excavation to the building foundation. The piping was apparently removed up to the building foundation. Please provide further information or propose further investigation to locate the extent and termination of the piping. Specifically, please determine whether the piping remains in place beneath the building or whether the piping extended to a dispenser at another location. Please present this information and plans for additional work in the Work Plan requested below.
2. **Elevated Concentrations of Fuel Hydrocarbons in Groundwater.** Highly elevated concentrations of dissolved fuel hydrocarbons and benzene have been detected in groundwater in the area of the former 550-gallon UST discussed in technical comment 1. During the December 11, 2000 groundwater sampling event, benzene was detected in groundwater collected from well 9MW3 at a concentration of 9,000 µ/L. However, the UST was suspected to have been out of use for approximately 20 years prior to the 1992 excavation. The continued detection of highly elevated concentrations of fuel hydrocarbons and BTEX in groundwater indicates that a significant source remains in the area of the former UST. Please propose further work to complete characterization of this area.
3. **Soil Vapor Sampling.** Two soil vapor samples (B5 and B6) were collected on September 22, 1998 inside the building adjacent to the former UST discussed in technical comment 1. Benzene was detected in soil vapor collected from B5 and B6 at concentrations of 51,000 and 29,000 parts per billion by volume, respectively. These concentrations significantly exceed the Environmental Screening Level (San Francisco Bay Regional Water Quality Control Board, 2005) for benzene in soil vapor for both residential and commercial land use. We request that you conduct further investigation to characterize the extent of the elevated concentrations of BTEX in soil vapor.

Mr. John Lilla
Mr. Harold Vignoles
Mr. Dallas Nelson
RO0000320
August 21, 2007
Page 3

4. **Second UST.** A suspected UST was described in the area of well 9MW4. No reports exist in ACEH files to indicate that this UST was removed. Please describe what tasks have been conducted to date to confirm that the UST was removed. In addition, please propose additional work as necessary, to confirm that the UST was removed and to investigate the extent of any residual contamination in the area of the former UST.
5. **Soil Removal Along Railroad Tracks.** A soil removal was conducted within a narrow area between the building and railroad tracks along the western border of the property. Soil was apparently excavated within five "pits" within this area. Elevated concentrations of petroleum hydrocarbons and creosote were detected in soil in this area. Please describe the likely source(s) of this contamination. In the Work Plan requested below, please propose additional investigation as necessary, to assess whether the contamination encountered in the pits extends beneath the adjacent building.
6. **PCBs in Soil.** PCBs were detected in soil in the northwestern portion of the site at concentrations ranging from 0.40 to 0.67 milligrams per kilogram. In the Work Plan requested below, please provide a more detailed map of the area that shows the likely source of the PCBs and the sampling locations where PCBs have been detected in soil.
7. **Elevated Concentrations of TPH as Kerosene and TPH as Motor Oil Detected in Boring B18.** Elevated concentrations of TPH as kerosene and TPH as motor oil were detected in a soil sample collected from boring B18. Boring B18 was reported to be in the area of an air compressor. In the Work Plan requested below, please provide a more detailed map of the area of boring B18 and proposed additional investigation as necessary to evaluate whether the contamination extends off-site.
8. **Groundwater Monitoring.** Groundwater samples have apparently not been collected from monitoring wells at the site since 2000. In the Work Plan requested below, please propose groundwater monitoring to evaluate current groundwater quality.

TECHNICAL REPORT REQUEST

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

- **October 22, 2007** – Work Plan

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

Mr. John Lilla
Mr. Harold Vignoles
Mr. Dallas Nelson
RO0000320
August 21, 2007
Page 4

ELECTRONIC SUBMITTAL OF REPORTS

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

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.

Mr. John Lilla
Mr. Harold Vignoles
Mr. Dallas Nelson
RO0000320
August 21, 2007
Page 5

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: Sami Malaeb
Jonas & Associates, Inc.
1350 Arnold Drive, Suite 202
Martinez, CA 94553

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

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

August 21, 2007

Mr. John Lilla
PACO Pumps, Inc.
16801 Greenspoint Park Drive
Houston, TX 77060

Subject: Fuel Leak Case No. RO0000320 and Geotracker Global ID T0600101592, PACO Pumps Inc, 9201 San Leandro Street, Oakland, CA 94603 – Additional Responsible Parties

Dear Mr. Lilla:

In a Notice of Responsibility dated October 18, 1993, PACO Pumps, Inc. was notified that the above referenced site had been placed in the Local Oversight Program and that PACO Pumps, Inc. was named as a Responsible Party for the fuel leak case. GP Holdings LLC and 9201 San Leandro LLC purchased the property and have been named additional Responsible Parties for the fuel leak case as defined under 23 C.C.R. Sec. 2720. Please see Attachment A – Responsible Parties Data Sheet, which identifies all Responsible Parties and provides background on the unauthorized release and Responsible Party Identification.

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

Sincerely,

A handwritten signature in black ink that reads "Jerry Wickham". The signature is written in a cursive, flowing style.

Jerry Wickham, P.G.
Hazardous Materials Specialist

Attachment A – Responsible Parties Data Sheet

cc: Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY ENVIRONMENTAL HEALTH
LUFT LOCAL OVERSIGHT PROGRAM

ATTACHMENT A - RESPONSIBLE PARTIES DATA SHEET

August 15, 2007

Site Name & Address:

PACO PUMPS INC
9201 SAN LEANDRO ST
Oakland, CA 94603

Local ID: RO0000320
Related ID: 4245
RWQCB ID: 01-1721
Global ID: T0600101592

All Responsible Parties

RP has been named a Primary RP - JOHN LILLA

PACO PUMPS INC

16801 GREENSPOINT PARK DR | HOUSTON, CA 77060 | Phone No Phone Number Listed

RP has been named a RP - HAROLD M VIGNOLES

9201 SAN LEANDRO LLC & HAROLD M VIGNOLES

9201 SAN LEANDRO ST | OAKLAND, CA 94603-1237 | Phone No Phone Number Listed

RP has been named a RP - DALLAS NELSON

G P HOLDINGS LLC

PO BOX 14046 | OAKLAND, CA 94614 | Phone (510) 635-8024

Responsible Party Identification Background

Alameda County Environmental Health (ACEH) names a "Responsible Party," as defined under 23 C.C.R. Sec. 2720. Section 2720 defines a responsible party 4 ways. An RP can be:

1. "Any person who owns or operates an underground storage tank used for the storage of any hazardous substance."
2. "In the case of any underground storage tank no longer in use, any person who owned or operated the underground storage tank immediately before the discontinuation of its use."
3. "Any owner of property where an unauthorized release of a hazardous substance from an underground storage tank has occurred."
4. "Any person who had or has control over an underground storage tank at the time of or following an unauthorized release of a hazardous substance."

ACEH has named the responsible parties for this site as detailed below.

ATTACHMENT A - RESPONSIBLE PARTIES DATA SHEET (Continued)

August 15, 2007

Responsible Party Identification

Existence of Unauthorized Release

An underground storage tank (UST) was identified on a 1954 Factory Insurance Association Map for the site. An attempt was made in 1992 to find the UST by excavating in the general location shown on the 1954 map. No tank was found but pipes, debris, and possible fill associated with the former UST were observed. Fuel hydrocarbons were detected in soil samples collected from the excavation. Five monitoring wells were installed at the site from 1992 to 1994. Fuel hydrocarbons (TPHg) and benzene, toluene, ethylbenzene, and xylenes (BTEX) were detected in groundwater samples collected from three of the five monitoring wells. The highest concentrations of TPHg and BTEX were detected in groundwater collected from monitoring well 9MW3, which is located adjacent to the location of the former UST. Based on the evidence of a former UST and soil and groundwater contamination in the area of the former UST, an unauthorized release has occurred.

Responsible Party Identification

PACO Pumps, Inc. was the business owner, tank owner, and property owner from approximately 1985 until 1995. PACO Pumps is the primary responsible party because unauthorized releases occurred during the time that PACO Pumps was the owner of property where an unauthorized release occurred (Definition 3) and PACO Pumps had control of the UST system at the time of or following unauthorized releases (Definition 4).

GP Holdings LLC purchased the property on or about October 23, 1995. GP Holdings LLC is a responsible party because they owned the property after an unauthorized release occurred (Definition 3).

9201 San Leandro LLC purchased the property on or about April 19, 2000. 9201 San Leandro LLC is a responsible party because they are the current property owner (Definition 3).

ALAMEDA COUNTY
HEALTH CARE SERVICES



RO320

AGENCY

DAVID J. KEARS, Agency Director

Certified Mail #: 7002203000069574

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August 15, 2007

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700

FAX (510) 337-9335

NOTICE OF RESPONSIBILITY

Site Name & Address:

PACO PUMPS INC
9201 SAN LEANDRO ST
Oakland, CA 94603

Local ID: RO0000320
Related ID: 4245
RWQCB ID: 01-1721
Global ID: T0600101592

Responsible Party:

DALLAS NELSON
G P HOLDINGS LLC
PO BOX 14048
OAKLAND CA 94614

*Revised Address: 5977 Keith Ave.
Oakland, CA 94618*

Date First Reported: 7/10/1992

Substance: 8006619 Gasoline-Automotive (motor gasoline and additives), leaded & unleaded

Funding for Oversight: LOPS - LOP State Fund

Multiple RPs?: Yes

Pursuant to sections 25297.1 and 25297.15 of the Health and Safety Code, you are hereby notified that the above site has been placed in the Local Oversight Program and the individual(s) or entity(ies) shown above, or on the attached list, has (have) been identified as the party(ies) responsible for investigation and cleanup of the above site. Section 25297.15 further requires the primary or active Responsible Party to notify all current record owners of fee title before the local agency considers cleanup or site closure proposals or issues a closure letter. For purposes of implementing section 25297.15, this agency has identified PACO PUMPS INC as the primary or active Responsible Party. It is the responsibility of the primary or active Responsible Party to submit a letter to this agency, within 20 calendar days of receipt of this notice that identifies all current record owners of fee title. It is also the responsibility of the primary or active Responsible Party to certify to the local agency that the required notifications have been made at the time a cleanup or site closure proposal is made or before the local agency makes a determination that no further action is required. If property ownership changes in the future, you must notify this local agency within 20 calendar days from when you are informed of the change.

Any action or inaction by this local agency associated with corrective action, including responsible party identification, is subject to petition to the State Water Resources Control Board. Petitions must be filed within 30 days from the date of the action/inaction. To obtain petition procedures, please FAX your request to the State Water Board at (916) 341-5808 or telephone (916) 341-5650.

Pursuant to section 25296.10(c)(6) of the Health and Safety Code, a responsible party may request the designation of an administering agency when required to conduct corrective action. Please contact this office for further information about the designation process.

Please contact your caseworker WICKHAM, JERRY, at this office at (510)567-6791 if you have questions regarding your site.

[Signature]
ARIL LEVI, Director
Contract Project Director

Date: *[Signature]*

Action: Add
Reason: Add RPs

ALAMEDA COUNTY ENVIRONMENTAL HEALTH
LUFT LOCAL OVERSIGHT PROGRAM

ATTACHMENT A - RESPONSIBLE PARTIES DATA SHEET

August 15, 2007

Site Name & Address:

PACO PUMPS INC
9201 SAN LEANDRO ST
Oakland, CA 94603

Local ID: RO0000320
Related ID: 4245
RWQCB ID: 01-1721
Global ID: T0600101592

All Responsible Parties

RP has been named a Primary RP - JOHN LILLA

PACO PUMPS INC

16801 GREENSPOINT PARK DR | HOUSTON, CA 77060 | Phone No Phone Number Listed

RP has been named a RP - HAROLD M VIGNOLES

9201 SAN LEANDRO LLC & HAROLD M VIGNOLES

9201 SAN LEANDRO ST | OAKLAND, CA 94603-1237 | Phone No Phone Number Listed

RP has been named a RP - DALLAS NELSON

G P HOLDINGS LLC

PO BOX 14046 | OAKLAND, CA 94614 | Phone (510) 635-8024

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ATTACHMENT A - RESPONSIBLE PARTIES DATA SHEET (Continued)

August 15, 2007

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GP Holdings LLC purchased the property on or about October 23, 1995. GP Holdings LLC is a responsible party because they owned the property after an unauthorized release occurred (Definition 3).

9201 San Leandro LLC purchased the property on or about April 19, 2000. 9201 San Leandro LLC is a responsible party because they are the current property owner (Definition 3).

SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Dallas Nelson
 GP Holdings LLC
 5977 Keith Ave.
 Oakland, CA 94618

2. Article Number
 (Transfer from service label)

7002 2030 0006 9574 1877

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
- Registered Return Receipt for Merchandise
- Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes



CERTIFIED MAIL™



7002 2030 0006 9574 1877



ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
 Department Of Environmental Health
 Environmental Protection Division
 1131 Harbor Bay Parkway
 Alameda, CA 94502-6577

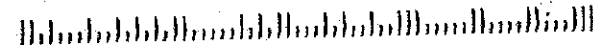
UNCLAIMED
 LN
 9/11/07

Mr. Dallas Nelson
 GP Holdings LLC
 5977 Keith Avenue

NIXIE 945 DC 1 00-09/22/07

RETURN TO SENDER
 UNCLAIMED
 UNABLE TO FORWARD

BC: 94502854031 *2505-05432-01-38



ALAMEDA COUNTY
HEALTH CARE SERVICES



F

AGENCY

DAVID J. KEARS, Agency Director

Certified Mail #: 70022030000695741853

August 15, 2007

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

NOTICE OF RESPONSIBILITY

Site Name & Address:

PACO PUMPS INC
9201 SAN LEANDRO ST
Oakland, CA 94603

Local ID: RO0000320
Related ID: 4245
RWQCB ID: 01-1721
Global ID: T0600101592

Responsible Party:

DALLAS NELSON
G P HOLDINGS LLC
PO BOX 14046
OAKLAND CA 94614

Date First Reported: 7/10/1992

Substance: 8006619 Gasoline-Automotive (motor gasoline and additives), leaded & unleaded

Funding for Oversight: LOPS - LOP State Fund

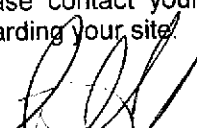
Multiple RPs?: Yes

Pursuant to sections 25297.1 and 25297.15 of the Health and Safety Code, you are hereby notified that the above site has been placed in the Local Oversight Program and the individual(s) or entity(ies) shown above, or on the attached list, has (have) been identified as the party(ies) responsible for investigation and cleanup of the above site. Section 25297.15 further requires the primary or active Responsible Party to notify all current record owners of fee title before the local agency considers cleanup or site closure proposals or issues a closure letter. For purposes of implementing section 25297.15, this agency has identified PACO PUMPS INC as the primary or active Responsible Party. It is the responsibility of the primary or active Responsible Party to submit a letter to this agency, within 20 calendar days of receipt of this notice that identifies all current record owners of fee title. It is also the responsibility of the primary or active Responsible Party to certify to the local agency that the required notifications have been made at the time a cleanup or site closure proposal is made or before the local agency makes a determination that no further action is required. If property ownership changes in the future, you must notify this local agency within 20 calendar days from when you are informed of the change.

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Pursuant to section 25296.10(c)(6) of the Health and Safety Code, a responsible party may request the designation of an administering agency when required to conduct corrective action. Please contact this office for further information about the designation process.

Please contact your caseworker WICKHAM, JERRY, at this office at (510)567-6791 if you have questions regarding your site.



ARIU LEVI, Director
Contract Project Director

Date: 

Action: Add
Reason: Add RPs

Attachment A: Responsible Parties Data Sheet
cc: Jenniffer Jordan, SWRCB, D. Drogos, File

7002 2030 0006 9574 1A53

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Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To Dallas Nelson, GP Holdings LLC

*Street, Apt. No.,
or PO Box No.* P.O. Box 14046

City, State, ZIP+4 Watsonville, CA 94614

PS Form 3800, June 2002 See Reverse for Instructions

ALAMEDA COUNTY ENVIRONMENTAL HEALTH
LUFT LOCAL OVERSIGHT PROGRAM

ATTACHMENT A - RESPONSIBLE PARTIES DATA SHEET

August 15, 2007

Site Name & Address:

PACO PUMPS INC
9201 SAN LEANDRO ST
Oakland, CA 94603

Local ID: **RO0000320**
Related ID: **4245**
RWQCB ID: **01-1721**
Global ID: **T0600101592**

All Responsible Parties

RP has been named a Primary RP - JOHN LILLA

PACO PUMPS INC

16801 GREENSPPOINT PARK DR | HOUSTON, CA 77060 | Phone No Phone Number Listed

RP has been named a RP - HAROLD M VIGNOLES

9201 SAN LEANDRO LLC & HAROLD M VIGNOLES

9201 SAN LEANDRO ST | OAKLAND, CA 94603-1237 | Phone No Phone Number Listed

RP has been named a RP - DALLAS NELSON

G P HOLDINGS LLC

PO BOX 14046 | OAKLAND, CA 94614 | Phone (510) 635-8024

Responsible Party Identification Background

Alameda County Environmental Health (ACEH) names a "Responsible Party," as defined under 23 C.C.R Sec. 2720. Section 2720 defines a responsible party 4 ways. An RP can be:

1. "Any person who owns or operates an underground storage tank used for the storage of any hazardous substance."
2. "In the case of any underground storage tank no longer in use, any person who owned or operated the underground storage tank immediately before the discontinuation of its use."
3. "Any owner of property where an unauthorized release of a hazardous substance from an underground storage tank has occurred."
4. "Any person who had or has control over an underground storage tank at the time of or following an unauthorized release of a hazardous substance."

ACEH has named the responsible parties for this site as detailed below.

ATTACHMENT A - RESPONSIBLE PARTIES DATA SHEET (Continued)

August 15, 2007

Responsible Party Identification

Existence of Unauthorized Release

An underground storage tank (UST) was identified on a 1954 Factory Insurance Association Map for the site. An attempt was made in 1992 to find the UST by excavating in the general location shown on the 1954 map. No tank was found but pipes, debris, and possible fill associated with the former UST were observed. Fuel hydrocarbons were detected in soil samples collected from the excavation. Five monitoring wells were installed at the site from 1992 to 1994. Fuel hydrocarbons (TPHg) and benzene, toluene, ethylbenzene, and xylenes (BTEX) were detected in groundwater samples collected from three of the five monitoring wells. The highest concentrations of TPHg and BTEX were detected in groundwater collected from monitoring well 9MW3, which is located adjacent to the location of the former UST. Based on the evidence of a former UST and soil and groundwater contamination in the area of the former UST, an unauthorized release has occurred.

Responsible Party Identification

PACO Pumps, Inc. was the business owner, tank owner, and property owner from approximately 1985 until 1995. PACO Pumps is the primary responsible party because unauthorized releases occurred during the time that PACO Pumps was the owner of property where an unauthorized release occurred (Definition 3) and PACO Pumps had control of the UST system at the time of or following unauthorized releases (Definition 4).

GP Holdings LLC purchased the property on or about October 23, 1995. GP Holdings LLC is a responsible party because they owned the property after an unauthorized release occurred (Definition 3).

9201 San Leandro LLC purchased the property on or about April 19, 2000. 9201 San Leandro LLC is a responsible party because they are the current property owner (Definition 3).

RO 320

Is your RETURN ADDRESS completed on the reverse side?	SENDER: <ul style="list-style-type: none"> • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered. 		I also wish to receive the following services (for an extra fee): <ol style="list-style-type: none"> <input type="checkbox"/> Addressee's Address <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.						
	3. Article Addressed to: EC #4245 John Lilla Paco Pum Inc. 80 E. Sir Francis Drake Larkspur CA 94939		4a. Article Number P 386 338 143						
	5. Signature (Addressee) <i>J. Anderson</i>		4b. Service Type <table border="0"> <tr> <td><input type="checkbox"/> Registered</td> <td><input type="checkbox"/> Insured</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified</td> <td><input type="checkbox"/> COD</td> </tr> <tr> <td><input type="checkbox"/> Express Mail</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> </table>	<input type="checkbox"/> Registered	<input type="checkbox"/> Insured	<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD	<input type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise
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<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD								
<input type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise								
6. Signature (Agent)		7. Date of Delivery 10/21/93							
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Thank you for using Return Receipt Service.

ALAMEDA COUNTY
HEALTH CARE SERVICES



F

AGENCY

DAVID J. KEARS, Agency Director

Certified Mail #: 70022030000695741860

August 15, 2007

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

NOTICE OF RESPONSIBILITY

Site Name & Address:

PACO PUMPS INC
9201 SAN LEANDRO ST
Oakland, CA 94603

Local ID: RO0000320
Related ID: 4245
RWQCB ID: 01-1721
Global ID: T0600101592

Responsible Party:

HAROLD M. VIGNOLES
**9201 SAN LEANDRO LLC & HAROLD M **
9201 SAN LEANDRO ST
OAKLAND CA 94603-1237

Date First Reported: 7/10/1992

Substance: 8006619 Gasoline-Automotive (motor gasoline and additives), leaded & unleaded

Funding for Oversight: LOPS - LOP State Fund

Multiple RPs?: Yes

Pursuant to sections 25297.1 and 25297.15 of the Health and Safety Code, you are hereby notified that the above site has been placed in the Local Oversight Program and the individual(s) or entity(ies) shown above, or on the attached list, has (have) been identified as the party(ies) responsible for investigation and cleanup of the above site. Section 25297.15 further requires the primary or active Responsible Party to notify all current record owners of fee title before the local agency considers cleanup or site closure proposals or issues a closure letter. For purposes of implementing section 25297.15, this agency has identified PACO PUMPS INC as the primary or active Responsible Party. It is the responsibility of the primary or active Responsible Party to submit a letter to this agency, within 20 calendar days of receipt of this notice that identifies all current record owners of fee title. It is also the responsibility of the primary or active Responsible Party to certify to the local agency that the required notifications have been made at the time a cleanup or site closure proposal is made or before the local agency makes a determination that no further action is required. If property ownership changes in the future, you must notify this local agency within 20 calendar days from when you are informed of the change.

Any action or inaction by this local agency associated with corrective action, including responsible party identification, is subject to petition to the State Water Resources Control Board. Petitions must be filed within 30 days from the date of the action/inaction. To obtain petition procedures, please FAX your request to the State Water Board at (916) 341-5808 or telephone (916) 341-5650.

Pursuant to section 25296.10(c)(6) of the Health and Safety Code, a responsible party may request the designation of an administering agency when required to conduct corrective action. Please contact this office for further information about the designation process.

Please contact your caseworker WICKHAM, JERRY, at this office at (510)567-6791 if you have questions regarding your site.



ARIU LEWI, Director
Contract Project Director

Date: 8/21/07

Action: Add
Reason: Add RPs

7002 2030 0006 9574 1860

U.S. Postal Service™
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(Domestic Mail Only; No Insurance Coverage Provided)

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Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
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Sent To Harold Ugnoles, 9201 San Leandro LLC
 Street, Apt. No.,
 or PO Box No. 9201 San Leandro St.
 City, State, ZIP+4 Oakland, CA 94603-1237

PS Form 3800, June 2002 See Reverse for Instructions

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Harold Ugnoles
 9201 San Leandro LLC
 9201 San Leandro St.
 Oakland, CA 94603-1237

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Lisa Henley Addressee
 B. Received by (Printed Name) LISA HENLEY
 C. Date of Delivery 8/22/07
 D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number
(Transfer from service label)

7002 2030 0006 9574 1860

ALAMEDA COUNTY ENVIRONMENTAL HEALTH
LUFT LOCAL OVERSIGHT PROGRAM

ATTACHMENT A - RESPONSIBLE PARTIES DATA SHEET

August 15, 2007

Site Name & Address:

PACO PUMPS INC
9201 SAN LEANDRO ST
Oakland, CA 94603

Local ID: RO0000320

Related ID: 4245

RWQCB ID: 01-1721

Global ID: T0600101592

All Responsible Parties

RP has been named a Primary RP - JOHN LILLA

PACO PUMPS INC

16801 GREENSPPOINT PARK DR | HOUSTON, CA 77060 | Phone No Phone Number Listed

RP has been named a RP - HAROLD M VIGNOLES

9201 SAN LEANDRO LLC & HAROLD M VIGNOLES

9201 SAN LEANDRO ST | OAKLAND, CA 94603-1237 | Phone No Phone Number Listed

RP has been named a RP - DALLAS NELSON

G P HOLDINGS LLC

PO BOX 14046 | OAKLAND, CA 94614 | Phone (510) 635-8024

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ATTACHMENT A - RESPONSIBLE PARTIES DATA SHEET (Continued)

August 15, 2007

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GP Holdings LLC purchased the property on or about October 23, 1995. GP Holdings LLC is a responsible party because they owned the property after an unauthorized release occurred (Definition 3).

9201 San Leandro LLC purchased the property on or about April 19, 2000. 9201 San Leandro LLC is a responsible party because they are the current property owner (Definition 3).

Wickham, Jerry, Env. Health

To: Kasey Cordoza
Cc: Drogos, Donna, Env. Health
Subject: RO0320 RE: 9201 San Leandro St



ftpUploadInstructions_2005_121...

Documents do not need to be placed in folders on the Alameda County ftp site. Please upload the document to the ftp site in order for the work plan to be processed and placed in the publicly available electronic files. Email submissions to me are not accepted. Thank you for also uploading to Geotracker.

Regards,
Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 fax
jerry.wickham@acgov.org

-----Original Message-----

From: Kasey Cordoza [mailto:kasey@eras.biz]
Sent: Wednesday, January 16, 2008 4:27 PM
To: Wickham, Jerry, Env. Health
Subject: 9201 San Leandro St

Here is the workplan for that site. I am trying to figure out where your folder is on your ftp site to upload it to. It has also been uploaded to Geotracker.

Kasey Cordoza
ERAS Environmental, Inc.
1533 B Street
510.247.9885 X301 - Office
510.886.5399 - fax

Chu, Eva, Env. Health

From: John Lilla (E-mail)[SMTP:jdilla@pccflow.com]
Reply To: jdilla@pccflow.com
Sent: August 22, 2001 9:46 AM
To: 'mark@servicewest.com' (E-mail); Michael (OAK) Barry (E-mail); Michael (OAK) Barry (E-mail)
Cc: EChu@co.alameda.ca.us (E-mail)
Subject: FW: Risk Results - 9201 Paco



Deedrestriction.doc

TO ALL:

I have been in communication with Eva Chu, who is with the agency, with oversight of the former Paco site at 9201 San Leandro St. In order to obtain regulatory closure of the site, she is requiring a residential risk scenario be run and a deed restriction be completed and filed by the current owners of the site. Attached is a sample version of the deed restriction.

Mark Jonas, please complete the residential risk scenario and also complete/prepare the deed restriction for filing. Once completed, please run a draft of the deed restriction by the owners, myself, and Eva for comments.

Please let me know if anyone has any questions.

John Lilla

-----Original Message-----

From: Chu, Eva, Env. Health [mailto:EChu@co.alameda.ca.us]
Sent: Thursday, August 09, 2001 9:45 AM
To: 'jdilla@pccflow.com'
Cc: 'Jonas, Mark'
Subject: RE: Risk Results - 9201 Paco

We routinely ask to have a residential scenario run, in case of possible future development of the property for residential use. Attached is the deed restriction format this Agency will be using. The text cannot be modified, but additions may be made.

<<Deedrestriction.doc>>
evachu

Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
(510) 567-6762
(510) 337-9335 fax

> -----
> **From:** John Lilla (E-mail)[SMTP:jdilla@pccflow.com]
> **Reply To:** jdilla@pccflow.com
> **Sent:** August 08, 2001 12:22 PM
> **To:** EChu@co.alameda.ca.us (E-mail)
> **Cc:** Mark Jonas (E-mail)
> **Subject:** FW: Risk Results - 9201 Paco
>

> Eva:
>
> Here is Mark Jonas' response to your question posed in your email. I
> don't know why a new residential based scenario is needed to be calculated
> as the nearest residential home is at least 300 yards away, or further,
> based on my recollection. This is all commercial area in the immediate
> vicinity.
>
> John Lilla
>
>
> -----Original Message-----
> From: Mark Jonas [mailto:mark@jonasinc.com]
> Sent: Wednesday, August 08, 2001 1:59 PM
> To: Lilla, John
> Subject: Risk Results - 9201 Paco
>
>
> Dear John:
> Eva Chu asked in her August 6, 2001 e-mail "Mark, do you recall if
> residential risks are exceeded for groundwater to indoor air inhalation?"
>
> Several issues:
> 1/ The March 16, 1998 RBCA Modeling report calculated risk for indoor
> commercial air exposure, rather than residential. Groundwater results
> from borings B1, B2, B3, & B4 were used. Our findings are as follows:
> Carcinogenic risk did not exceed 1(10)-5 for indoor commercial air
> exposure from groundwater contamination. Non-carcinogenic risk did not
> exceed the target hazard quotient of 1 for indoor commercial air exposure
> from groundwater contamination. To determine residential risk we would
> need to perform the RBCA runs using a residential scenario.
>
> 2/ Subsurface air quality, from boring B5 and B6, found Benzene exceeding
> the Risk Based Screening Level, per our "B5 and B6 Soil Vapor Sampling and
> Results." Because of this, the May 1, 2000 "Risk Management Plan" was
> implemented, including adding a ventilation system.
>
> I hope this provides some insight into Eva's question.
>
> You are welcome to send this to Eva or, if authorized by you, I can send
> it directly to Eva.
>
> Please call or e-mail to discuss any issue.
>
> I'll be on vacation in the High Sierra from August 11-18, 2001 and back in
> the office on August 20, 2001.
>
> Sincerely,
> Mark Jonas
> J&A Project Manager
>

Chu, Eva, Public Health, EHS

From: Chu, Eva, Public Health, EHS
Sent: October 17, 2000 2:50 PM
To: 'mark@jonasinc.com'
Subject: 9201 San Leandro Street, Oakland,

Mark,

I had requested the measurement of dissolved oxygen, oxidation-reduction potential, nitrate, sulfate, ferrous ion, and alkalinity in all monitoring wells to demonstrate that natural biodegradation is occurring at the site. I'm wasn't convinced that ORC helped.

Across the plume with increasing contaminant concentrations, any of the following trends would suggest that potential intrinsic biodegradation is occurring:

A relative decrease in DO, ORP, nitrate, and/or sulfate

A relative increase in ferrous ion and/or alkalinity.

If the above parameters are measured, you might be able to reason that the plume is stable because natural biodegradation is occurring at the site. Our aim in doing this round of sampling is to demonstrate plume stability and/or plume is decreasing.

If you still need to talk, give me a jingle.

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

StID 4245

August 1, 2000


Mr. John Lilla
Paco Pumps
16801 Greenspoint Park Drive, #355
Houston TX 77060

RE: Work Plan Approval for 9201 San Leandro Street, Oakland, CA

Dear Mr. Lilla:

I have reviewed Jonas & Associates Inc.'s July 2000 proposal to sample groundwater from Well 9MW3, 9MW1 and 9MW5 at the above referenced site. The proposal is acceptable and work should be completed at your convenience. The groundwater monitoring report to be submitted upon completion of field activities, should include evidence that the contaminant plume is stable or decreasing. Measurements of dissolved oxygen, oxidation-reduction potential, nitrate, sulfate, ferrous iron, and alkalinity can help to demonstrate that biodegradation is occurring at the site. Graphs of the concentration of contaminants versus depth to water and versus time should also be used to support your request for site closure.

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


eva chu
Hazardous Materials Specialist

email: Mark Jonas (mark@jonasinc.com)



JONAS & ASSOCIATES INC.

Environmental Consultants

2815 Mitchell Drive, Suite 209 • Walnut Creek, CA 94598 • Tel: (510)⁹²⁵ 933-5360 • Fax: (510)⁹²⁵ 933-5362

July 28, 2000

Ms. Eva Chu
Hazardous Materials Specialist
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Second Floor
Alameda, California 94502
(510) 567-6762; 337-9335 fax

Subject: Work Plan for Groundwater Sampling Round.

Project: Former PACO Pumps, 9201 San Leandro Street, Oakland, California.

Dear Ms. Chu:

Following is the scope of work for sampling groundwater from monitoring well 9MW3 and downgradient monitoring wells 9MW1 and 9MW5:

- » Sample Monitoring Wells 9MW1, 9MW3, and 9MW5 following general protocol presented in J&A, 1992 "Site Characterization Report and Work Plan." Analyze samples for Total Petroleum Hydrocarbons as Gasoline (TPH-G), Benzene, Toluene, Ethyl Benzene, and Total Xylenes (BTEX). We expect to sample these monitoring wells in August 2000.
- » Groundwater Monitoring Report presenting methods and results. This report will be submitted within two (2) weeks after receiving the sampling results.

This event represents the seventeenth (17th) round of groundwater samples collected from the facility, dating back to November 1992. We understand that this latest sampling event will aid in a final determination for site closure.

Please notify us of your approval to proceed with this scope of work. Should you have any questions or comments, please contact us at your convenience.

Sincerely,
JONAS & ASSOCIATES INC.


Mark Jonas, R.G.
J&A Project Manager

cc: John Lilla

00 JUL 31 PM 3:59

ENVIRONMENTAL
PROTECTION

0ltr7-28.pco

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

StID 4245

June 26, 2000

Mr. John Lilla
Paco Pumps
16801 Greenspoint Park Drive, #355
Houston TX 77060

RE: Plume Stability at 9201 San Leandro Street, Oakland, CA

Dear Mr. Lilla:

I have completed review of the case file for the above referenced site to determine if site closure can be granted at this time. Case closure is usually recommended when the site is determined to be a low risk groundwater case, based on the definition provided in the attached State Water Resources Control Board's *Interim Guidance on Required Cleanup at Low Risk Fuel Sites*.

It is the opinion of this office that additional information is needed to demonstrate that the dissolved hydrocarbon plume is not migrating (definition #3). The last four groundwater sampling events (5/96, 11/96, 5/97, and 1/98) show that benzene concentrations from Well MW3 are increasing. At this time, a graph (concentration versus depth to water and versus time) should be prepared to evaluate the concentration trend in the vicinity of the source area. It may also be necessary to collect another round groundwater samples from Well MW3. Your consultant can best advise you in this matter.

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

eva chu
Hazardous Materials Specialist

email: Mark Jonas (mark@jonasinc.com)

attachment

Chu, Eva, Public Health, EH

From: Chu, Eva, Public Health, EH
Sent: martedì 15 febbraio 2000 15.23
To: 'mark@jonasinc.com'
Subject: 9201 San Leandro Street, Oakland

Hi Mark,

Please submit a risk management plan (RMP) for the former Paco Pump site at 9201 San Leandro Street, Oakland, CA. The RMP should address the maintenance of a cap over residual PCB, a site safety plan if construction occurs at areas with residual PCB and/or petroleum hydrocarbon, maintenance of the mechanical exhaust fan installed in the warehouse, etc.

I have faxed over examples of RMPs. Please include points which are pertinent to the subject site. If you need a formal request for the RMP, please let me know.

eva

eva

Alameda Co. Environmental Health
Phone: (510) 567-6762
Fax: (510) 337-9335



JONAS & ASSOCIATES INC.

Environmental Consultants

2815 Mitchell Drive, Suite 209 • Walnut Creek, CA 94598 • Tel: (510)⁹²⁵ 933-5360 • Fax: (510)⁹²⁵ 933-5362

Ms. Eva Chu
Hazardous Materials Specialist
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Second Floor
Alameda, California 94502
(510) 567-6762; 337-9335 fax

May 1, 2000

Subject: Attachment to October 16, 1998 "B5 and B6 Soil Vapor Sampling and Results."

Project: Former PACO Pumps, 9201 San Leandro Street, Oakland, California.
J&A #: PCO-220

Dear Ms. Chu:

This correspondence is in response to your recent request for us to provide the results presented in our October 16, 1998 "B5 and B6 Soil Vapor Sampling and Results" in terms of mg/m³. Following are the B5 and B6 soil vapor sampling results in terms of ppbv and mg/m³:

BTEX AND TPH-GASOLINE SOIL VAPOR RESULTS

Analyte	M.W. (g/mol)	B5-3' (ppbv)	B5-3' (mg/m ³)	B6-3' (ppbv)	B6-3' (mg/m ³)
Benzene	78.11	51,000	162.9	29,000	92.7
Toluene	92.15	6,800	25.6	5,300	20.0
Ethyl Benzene	106.16	ND(2,500)	ND(10.9)	ND(2,100)	ND(9.1)
Total Xylenes	106.16	4,400	19.1	4,900	21.3
TPH (C5+) Gasoline	~ 100	15,000,000	61,350	9,800,000	40,082
TPH (C2-C4) Gasoline	~ 40	160,000	262	2,000,000	3,272

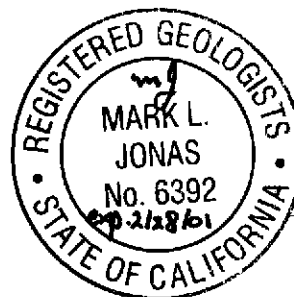
The conversion calculation used in this table is $mg/m^3 = (ppbv/1000) \times (M.W./24.45)$ and was obtained from the U.S. Environmental Protection Agency along with the molecular weight (M.W.) for BTEX. Air Toxics, Ltd. provided the M.W. for the gasolines.

Please attach this correspondence to the October 16, 1998 "B5 and B6 Soil Vapor Sampling and Results."

Sincerely,
JONAS & ASSOCIATES INC.

Mark
Mark Jonas, R.G.
Project Manager

cc: Distribution



DOCUMENT DISTRIBUTION

Former Paco Pumps Facility
9201 San Leandro Street, Oakland, California:

Small Business Administration

District Counsel
Small Business Administration
455 Market Street, Sixth Floor
San Francisco, California 94105

Lender

Kathryn J. Sennott
District Manager
Heller Financial
50 Beale Street, 16th Floor
San Francisco, California 94105

Borrower

Leonard M. Silvani
GP Holding, LLC
P.O. Box 14046
Oakland, California 94614

BAEDC

James Baird
Bay Area Employment Development Company
1801 Oakland Boulevard, Suite 300
Walnut Creek, California 94596

Indemnitor

Mr. John Lilla
Paco Pumps, Inc.
16801 Greenspoint Park Drive, Suite 355
Houston, Texas 77060



JONAS & ASSOCIATES INC.

Environmental Consultants

2815 Mitchell Drive, Suite 209 • Walnut Creek, CA 94598 • Tel: (916) 933-5360 • Fax: (916) 933-5362

December 9, 1999

Ms. Eva Chu
Hazardous Materials Specialist
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Second Floor
Alameda, California 94502
510/567-6762; 337-9335 fax

Subject: Request for No Further Action Letter.

Project: Former PACO Pumps, Inc.
9201 San Leandro Street, Oakland, California
J&A #: PCO-220

Dear Eva:

The ventilation system is installed per the Risk Management Plan. I will call to schedule a day and time for your inspection.

Our understanding is that the installation of the ventilation system is the last regulatory action required for this site. Assuming the ventilation system is acceptable, we would like to receive a letter stating No Further Regulatory Action Required for this site or similar wording. Please address and send this letter to:

Mr. John Lilla
Vice President
PACO PUMPS, INC.
16801 Greenspoint Park Drive, Suite 355
Houston, Texas 77060

Also, please fax us a copy of this letter.

Please call to discuss any issue.

Sincerely,
JONAS AND ASSOCIATES INC.

Mark L. Jonas
Mark L. Jonas, R.G.
J&A Project Manager

cc: Document Distribution.

Final Document Distribution
9201 San Leandro Street, Oakland, California:

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Small Business Administration
455 Market Street, Sixth Floor
San Francisco, California 94105
(415) 744-6820; 1(800) 827-5722

Lender

Kathryn J. Sennott
District Manager
Heller Financial
50 Beale Street, 16th Floor
San Francisco, California 94105

Borrower

Leonard M. Silvani
GP Holding, LLC
P.O. Box 14046
Oakland, California 94614

BAEDC

James Baird
Bay Area Employment Development Company
1801 Oakland Boulevard, Suite 300
Walnut Creek, California 94596

Indemnitor

Mr. John Lilla
Paco Pumps, Inc. (PCC Flow Technologies, Inc.)
16801 Greenspoint Park Drive, Suite 355
Houston, Texas 77060
(281) 775-1697
(281) 873-2042 fax

JONAS & ASSOCIATES INC.
Environmental Consultants

(925) 933-5360
Walnut Creek, California

FAX / TELECOPY TRANSMITTAL

From: Mark Jonas	of: J&A	FAX #: (925) 933 - 5362
To: Eva Chu	of: Alameda County Health	FAX #: (510) 337 - 9335
Date: 12 / 9 / 1999	Project: Former Paco Pump, Oakland	
Time:	Project #: PCO-220	
Attachments:		
1) J&A letter titled "Request for No Further Action Letter."		
2)		
3)		
Number of Attached Pages (not including transmittal page):		1

Message:

Dear Eva,

The ventilation system is finished. If you would still like to inspect the system we can schedule a day and time.

I hope all is going well with you and your family.

Sincerely,


Mark Jonas, R.G.
Project Manager

1586-19-201.6



JONAS & ASSOCIATES INC.

Environmental Consultants

2815 Mitchell Drive, Suite 209 • Walnut Creek, CA 94598 • Tel: (510) 933-5360 • Fax: (510) 933-5362

December 9, 1999

Ms. Eva Chu
Hazardous Materials Specialist
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Second Floor
Alameda, California 94502
510/567-6762; 337-9335 fax

FAXED
12/9/99

Subject: Request for No Further Action Letter.
Project: Former PACO Pumps, Inc.
9201 San Leandro Street, Oakland, California
J&A #: PCO-220

Dear Eva:

The ventilation system is installed per the Risk Management Plan. I will call to schedule a day and time for your inspection.

Our understanding is that the installation of the ventilation system is the last regulatory action required for this site. Assuming the ventilation system is acceptable, we would like to receive a letter stating No Further Regulatory Action Required for this site or similar wording. Please address and send this letter to:

Mr. John Lilla
Vice President
PACO PUMPS, INC.
16801 Greenspoint Park Drive, Suite 355
Houston, Texas 77060

Also, please fax us a copy of this letter.

Please call to discuss any issue.

Sincerely,
JONAS AND ASSOCIATES INC.

Mark
Mark L. Jonas, R.G.
J&A Project Manager

cc: Document Distribution.

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 4245

July 28, 1998

Mr. John Lilla
PCC Flow Technologies
16801 Greenspoint Park Dr, Suite 355
Houston, TX 77060

RE: Work Plan Approval for 9201 San Leandro Street, Oakland, CA

Dear Mr. Lilla:

I have completed review of Jonas & Associates Inc's July 1998 "Soil Vapor Sampling Work Plan" prepared for the above referenced site. The proposal to advance two soil borings and collect soil vapor samples at ~1' to 3' bgs using Summa Canisters is acceptable. In order to prevent ambient air from mixing with subsurface vapors, a tight seal is required above the sampling point. It is recommended that a direct-push sampling method, such as Geoprobe, be used for this phase of the investigation. The sampling hose should be purged of ambient air prior to sampling.

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

eva chu
Hazardous Materials Specialist

c: Mark Jonas
2815 Mitchell Dr, Suite 209
Walnut Creek, CA 94598



JONAS & ASSOCIATES INC.

Environmental Consultants

2815 Mitchell Drive, Suite 209 • Walnut Creek, CA 94598 • Tel: (510) 933-5360 • Fax: (510) 933-5362

925 PROTECTION 925

July 10, 1998

98 JUL 15 AM 8:50

Ms. Eva Chu
Hazardous Materials Specialist
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Second Floor
Alameda, California 94502
(510) 567-6762; 337-9335 fax

*Need tight seal so ambient
air does not mix w/ subsurface
vapor. Recommend using direct
push system*

Subject: Attachment to July 7, 1998 Soil Vapor Sampling Work Plan.

Project: Former PACO Pumps, Inc.
9201 San Leandro Street, Oakland, California
J&A #: PCO-220

Dear Ms. Chu:

As requested in your telephone call, the following are changes and clarification to our July 7, 1998 "Soil Vapor Sampling Work Plan":

Modification

The two vapor samples collected from borings B5 and B6 will be analyzed for Total Petroleum Hydrocarbons as Gasoline (TPH-g) and Benzene, Toluene, Ethyl Benzene, and Total Xylenes (BTEX).

Clarification on Sample Collection

A rotohammer will be utilized to bore through the concrete surface at each borehole location. A clean stainless steel auger will then be used to remove approximately two feet of soil from the borehole.

After each borehole is advanced to the proper depth a sampling hose attached to a Summa Canister will be lowered into the borehole to collect a vapor sample. A regulator will be used on the Summa Canister to allow for sample collection over a one hour period. To inhibit air exchange during the collection of the vapor sample the top of the borehole will be covered. The sample will be labeled, stored in a cooler for transportation to the laboratory, and recorded on a chain-of-custody record. The borehole will then be filled with excavated material and surfaced with concrete.

Concluding Statement

Please call to discuss any issue associated with this proposed scope of work.

Jonas & Associates Inc.

Thank you for your work on this project.

Sincerely,
JONAS AND ASSOCIATES INC.


Mark L. Jonas, R.G.
Project Manager

cc: Distribution

8ltr7-10.pco

DOCUMENT DISTRIBUTION

Former Paco Pumps
9201 San Leandro Street, Oakland, California:

Small Business Administration

District Counsel
Small Business Administration
211 Main Street, 4th Floor
San Francisco, California 94105

Lender

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Senior Loan Officer
Heller First Capital Corporation
650 California Street, 23rd Floor
San Francisco, California 94108

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1801 Oakland Boulevard, Suite 300
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Indemnitor

Mr. John Lilla
Paco Pumps, Inc.
16801 Greenspoint Park Drive, Suite 355
Houston, Texas 77060



JONAS & ASSOCIATES INC.
 Environmental Consultants
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2815 Mitchell Drive, Suite 209 • Walnut Creek, CA 94598 • Tel: (916) 933-5360 Fax: (916) 933-5362
 925 925

July 7, 1998

Ms. Eva Chu
 Hazardous Materials Specialist
 Alameda County Environmental Health Services
 1131 Harbor Bay Parkway, Second Floor
 Alameda, California 94502
 (510) 567-6762; 337-9335 fax

- How will boring be done?
- How will SV be collected.
- how long will excavate borehole.
- how will canisters be filled.
- Do TPAg & BTEX

Subject: Soil Vapor Sampling Work Plan.
 Project: Former PACO Pumps, Inc.
 9201 San Leandro Street, Oakland, California
 J&A #: PCO-220

Dear Ms. Chu:

As requested, this correspondence presents a brief work plan to collected two vapor soil samples at the former PACO Pumps facility, located at 9201 San Leandro Street, in Oakland, California.

Sampling Location

The vapor samples will be collected from two boring in the enclosed room in the general areas where samples B1 and B2 were collected.

Sampling Methodology

Sampling locations will be marked prior to contacting the Underground Service Alert (USA) for utility clearance. These boreholes will be identified as B5 and B6. A drilling permit shall be obtained.

At each borehole location the concrete will be drilled and approximately two feet of soil will be removed from the borehole. A one-liter canister air sampler will be used to collect vapor samples from each borehole. The boreholes will then be filled with excavated material and surfaced with concrete.

Analysis of Samples

Both vapor samples will be analyzed for Benzene. TPAg / BTEX

Evaluation and Reporting

After collection and analysis of the vapor samples a brief letter report will be submitted to Alameda County Environmental Health Services.

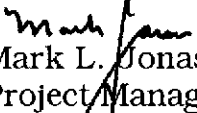
Sampling results will be compared with Risk Based Screening Levels (RBSLs). If the concentrations are below the RBSL for Benzene than PACO Pumps shall request regulatory closure for the facility. If vapor concentrations are above the RBSL, a risk management plan shall be considered. The RBSL for Benzene for 10^{-5} cancer risk is 384 ppbv.

Concluding Remarks

Please call to discuss any issue associated with this proposed scope of work.

Thank you for your work on this project.

Sincerely,
JONAS AND ASSOCIATES INC.


Mark L. Jonas, R.G.
Project Manager

cc: Distribution

DOCUMENT DISTRIBUTION

Former Paco Pumps
9201 San Leandro Street, Oakland, California:

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District Counsel
Small Business Administration
211 Main Street, 4th Floor
San Francisco, California 94105

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Heller First Capital Corporation
650 California Street, 23rd Floor
San Francisco, California 94108

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GP Holding, LLC
P.O. Box 14046
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Bay Area Employment Development Company
1801 Oakland Boulevard, Suite 300
Walnut Creek, California 94596

Indemnitor

Mr. John Lilla
Paco Pumps, Inc.
16801 Greenspoint Park Drive, Suite 355
Houston, Texas 77060

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 4245

May 4, 1998

Mr. John Lilla
PCC Flow Technologies
16801 Greenspoint Park Dr, Suite 355
Houston, TX 77060

RE: Soil Gas Vapor Sampling at 9201 San Leandro Street, Oakland, CA

Dear Mr. Lilla:

I have completed review of Jonas & Associates' March 1998 B3 and B4 Groundwater Sampling and Results report and their March 1998 Risk-Based Corrective Action (RBCA) Modeling report for the above referenced site. In the RBCA report it concluded that BTEX in groundwater did not pose a carcinogenic risk for an indoor commercial air exposure pathway.

In January 1998 boreholes B3 and B4 were drilled to 15' bgs at the site. Groundwater did not enter the boreholes. Because of the slow recharge, grab groundwater samples were not collected until February 2, 1998. The samples were analyzed for TPHg and BTEX. Data from these boreholes and from quarterly groundwater monitoring of wells 9MW3 and 9MW5 were used to derive representative BTEX concentrations within groundwater under the facility building.

Today Ms. Madhulla Logan and I met with Mr. Mark Jonas at the above referenced site. It became apparent that borings B3 and B4 were drilled within an enclosed room. Because benzene concentrations are highest in groundwater beneath the enclosed room, human health risk cannot be determined by the use of area-weighted averaging for the entire building. Rather, it is recommended that two soil vapor samples be collected from two borings, at approximately 1' to 3' bgs, within the enclosed room. Vapor concentrations can be compared with the Risk Based Screening Levels (RBSLs) established for and by the SF-RWQCB (see attachment). If the vapor concentrations are above the RBSLs, then a risk management plan will be required to mitigate vapors that may enter the enclosed room.

Please submit a workplan for the soil gas vapor sampling. If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

enclosure

c: Mark Jonas
Jonas and Associates
2815 Mitchell Dr, Suite 209
Walnut Creek, CA 94598



JONAS & ASSOCIATES INC.

Environmental Consultants

2815 Mitchell Drive, Suite 209 • Walnut Creek, CA 94598 • Tel: (510) 933-5360 • Fax: (510) 933-5362

March 16, 1998

Sent Again: April 20, 1999

Ms. Eva Chu
Department of Environmental Health
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 94502
(510) 567-6764; 337-9335 fax

Subject: Transmittal of the March 16, 1998 "Risked-Based Corrective Action (RBCA) Modeling, Former Paco Pumps, 9201 San Leandro Street, Oakland, California"

Project: Former Paco Pumps
9201 San Leandro Street, Oakland, California
J&A #: PCO-220

Dear Eva:

Attached is the March 16, 1998 "Risked-Based Corrective Action (RBCA) Modeling, Former Paco Pumps, 9201 San Leandro Street, Oakland, California". This report presents the methodology and results associated modeling indoor commercial air exposure as a result of groundwater contamination. As identified by the modeling results chemical carcinogenic risk did not exceed either $1(10)^{-5}$ or the non-carcinogenic hazard quotient of 1 for indoor commercial air exposure. The modeling effort used maximum concentrations from four sampling rounds for monitoring wells 9MW3 and 9MW5, along with the groundwater results for Boreholes B1, B2, B3, and B4.

Therefore, since the estimated risk associated with indoor commercial air exposure is considered within an acceptable range, for Paco Pumps, Inc. we are requesting regulatory closure for the site.

I would be glad to meet with you to discuss the attached report or any aspect associated with this project.

Sincerely,
JONAS AND ASSOCIATES INC.


Mark L. Jonas, R.G.
Project Manager

attachment: One copy of the March 16, 1998 "Risked-Based Corrective Action (RBCA) Modeling, Former Paco Pumps, 9201 San Leandro Street, Oakland, California"

cc: Mr. John Lilla (Paco Pumps, Inc.)
Distribution

8ltr3-16.pc0

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Paco Pumps, Inc. (PCC Flow Technologies, Inc.)
16801 Greenspoint Park Drive, Suite 355
Houston, Texas 77060
(281) 775-1697
(281) 873-2042 fax

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

StID 4245

October 2, 1997

Mr. John Lilla
PCC Flow Technologies, Inc
16801 Greenspoint Park Dr, Suite 355
Houston, TX 77060

RE: Workplan Approval for 9201 San Leandro St, Oakland, CA

Dear Mr. Lilla:

I have reviewed Jonas & Associates' July 1997 Work Plan for Further Groundwater Characterization for the above referenced site. The proposal to advance borings at two locations, approximately 50' to 100' downgradient of monitoring well 9MW3, to collect groundwater samples is acceptable. Please notify this office at least 72 hours prior to the start of field activities.

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

A handwritten signature in black ink, appearing to read 'eva chu', written in a cursive style.

eva chu
Hazardous Materials Specialist

c: Mark Jonas
2815 Mitchell Dr, Suite 290
Walnut Creek, CA 94598

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

StID 4245

January 27, 1997

Mr. John Lilla
PCC Flow Technologies
301 Camp Craft Road, Suite 100
West Lake Hills
Austin, TX 78746

RE: Workplan Approval for 9201 San Leandro Street, Oakland, CA

Dear Mr. Lilla:

I have completed review of Jonas & Associates Inc's January 1997 Work Plan for Soil and Groundwater Characterization for the above referenced site. The proposal to advance two exploratory borings to collect soil and groundwater samples for organic carbon content, bulk density, moisture and porosity as well as TPHg and BTEX is acceptable. Field work should commence within 45 days of the date of this letter.

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

eva chu
Hazardous Materials Specialist

c: Mark Jonas
2815 Mitchell Dr, Suite 209
Walnut Creek, CA 94598

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

StID 4245

December 12, 1996

Mr. John Lilla
PCC Flow Technologies
301 Camp Craft Road, Suite 100
West Lake Hills
Austin, TX 78746

RE: Soil Borings at 9201 San Leandro Street, Oakland, CA

Dear Mr. Lilla:

I have completed review of Jonas & Associates Inc's December 1996 Groundwater Monitoring Report for the above referenced site. After 14 groundwater sampling events hydrocarbon concentrations in well 9-MW3 have not decreased, even after the introduction of an oxygen releasing compound.

At this time it is recommended that soil borings (2) be advanced within the warehouse and approximately 10' to 20' downgradient of well 9-MW3, to collect soil and grab groundwater samples. One soil sample should be collected from the vadose zone (~5' bgs) and tested for fraction of organic carbon content, bulk density, water content, and porosity. A soil sample from each boring should also be collected from the capillary and analyzed for TPHg and BTEX. A water sample from each boring should also be analyzed for TPHg and BTEX.

Please submit a brief workplan detailing the work intended to delineate the extent and severity of contamination under the warehouse. Results of this phase of investigation will be reviewed to determine if a risk assessment and/or closure is applicable for the site.

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

eva chu
Hazardous Materials Specialist

c: Mark Jonas, 2815 Mitchell Dr, #209, Walnut Creek, CA 94598



JONAS & ASSOCIATES INC.
Environmental Consultants

2815 Mitchell Drive, Suite 209 • Walnut Creek, CA 94598 • Tel: (510) 933-5360 • Fax: (510) 933-5362

December 6, 1996

Ms. Eva Chu
Hazardous Materials Specialist
Department of Environmental Health
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 94502
(510) 567-6762

- ① 2 Berings
- ② collect soil for FOC, Bulk dens
water content, porosity
- ③ SS. at cap pump for TPhg BTEX
GW for TPhg BTEX
- ④ Evaluate for closure if HRS
are "clean"
- ⑤ letter w.P. be submitted

Subject: Transmittal of the "Groundwater Monitoring Report, Sampling Round Fourteen, PACO Pumps, 9201 San Leandro Street, Oakland, California".

Project: Former PACO Pumps Facility
9201 San Leandro Street, Oakland, California
J&A #: PCO-220

Dear Eva:

Attached is the December 6, 1996 "Groundwater Monitoring Report, Sampling Round Fourteen, PACO Pumps, 9201 San Leandro Street, Oakland, California". This report presents data associated with groundwater sampling round fourteen and the fifth round after the Oxygen Release Compound (ORC) was placed into monitoring well 9MW3. The ORC has been removed from monitoring well 9MW3.

The next sampling round will occur in May 1997. The monitoring wells to be sampled include 9MW3 and 9MW5.

Thank you for your time.

Sincerely,
JONAS AND ASSOCIATES INC.

Mark L. Jonas
Mark L. Jonas, R.G.
Project Manager

attachment: One copy of the December 6, 1996 "Groundwater Monitoring Report, Sampling Round Fourteen, PACO Pumps, 9201 San Leandro Street, Oakland, California".

cc: see attached Distribution List.

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1801 Oakland Boulevard, Suite 300
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Indemnitor

Mr. John Lilla *v.l.*
PCC Flow Technologies, Inc. (for Paco Pumps, Inc.)
301 Camp Craft Road, Suite 100
West Lake Hills
Austin, Texas 78746
(512) 314-8500
(512) 314-8511 fax



JONAS & ASSOCIATES INC.

Environmental Consultants

2815 Mitchell Drive, Suite 209 • Walnut Creek, CA 94598 • Tel: (510) 933-5360 • Fax: (510) 933-5362

ENVIRONMENTAL PROTECTION
JUL 13 1996
6/16/96
July 2, 1996

Ms. Eva Chu
Hazardous Materials Specialist
Department of Environmental Health
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 94502
(510) 567-6762

Subject: Transmittal of the "Groundwater Monitoring Report, Sampling Round Thirteen, PACO Pumps, 9201 San Leandro Street, Oakland, California".

Project: Former PACO Pumps Facility
9201 San Leandro Street, Oakland, California
J&A #: PCO-220

Dear Eva:

Attached is the July 2, 1996 "Groundwater Monitoring Report, Sampling Round Thirteen, PACO Pumps, 9201 San Leandro Street, Oakland, California". This report presents data associated with groundwater sampling round thirteen and the fourth round after the Oxygen Release Compound (ORC) was placed into monitoring well 9MW3. In the report we have included Section 4.0 "Evaluation of ORC Approach", which presents a discussion of the oxygen release compound (ORC) approach, an evaluation with respect to the analytical results, and recommendations. We are specifically requesting the option to discontinue the use of the ORC in monitoring well 9MW3.

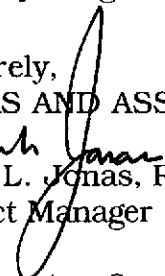
We also appreciate your May 22, 1996 letter titled "ORC at 9201 San Leandro St, Oakland, CA". As stated in your letter, PACO shall:

- 1/ Discontinue the sampling of monitoring well 9MW1, 9MW2, and 9MW4;
- 2/ Sample monitoring well 9MW3 semi-annually, in the spring and fall quarters; &
- 3/ Sample monitoring well 9MW5 annually, in the spring quarter.

Therefore, our next sampling round will be performed in November 1996.

Thank you again for your time.

Sincerely,
JONAS AND ASSOCIATES INC.


Mark L. Jonas, R.G.
Project Manager

attachment: One copy of the July 2, 1996 "Groundwater Monitoring Report, Sampling Round Thirteen, PACO Pumps, 9201 San Leandro Street, Oakland, California".

cc: see attached Distribution List.

6ltr7-2.pc0

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9201 San Leandro Street
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Newflo Corporation (for Paco Pumps, Inc.)
301 Camp Craft Road, Suite 100
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Austin, Texas 78746
(512) 314-8500
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ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, DIRECTOR

StID 4245

May 22, 1996

Mr. John Lilla
Newflo Corp
301 Camp Craft Rd, Suite 100
West Lake Hills
Austin, TX 78746

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

RE: ORC at 9201 San Leandro St, Oakland, CA

Dear Mr. Lilla:

I have received information from Regensis, who developed the Oxygen Release Compound (ORC) remediation technology, that it is not recommended to purge monitoring wells with ORC prior to sampling. Purging would remove dissolved oxygen, thus defeating the purpose of using ORC. Well 9MW3 which currently has ORC socks installed should not be purged in future sampling events.

Well 9MW3 has been sampled for four consecutive quarters after the installation of ORC. Analytical results have not shown a decrease in petroleum hydrocarbon concentrations. Oxygen may not be the limiting factor for natural bioattenuation at this site. The use of ORC may be discontinued if it is proven not to be an effective remediation technology for the site.

You may wish to consider the advancement of "Geoprobes" or "Hydropunches" within the warehouse to delineate the extent and severity of hydrocarbon contamination. Data from this phase of the investigation could be used in ASTM's RBCA Tier 2 as a screening tool to determine risk and cleanup levels.

In the meantime, sampling frequency for onsite wells may be reduced as follows:

1. discontinue sampling wells 9MW1, 9MW2, and 9MW4;
2. sample semi-annually (spring and fall quarters) well 9MW3;
and
3. sample annually, in the spring quarter, well 9MW5.

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

eva chu
Hazardous Materials Specialist

c: Mark Jonas, 2815 Mitchell Dr, #209, Walnut Creek, CA 94598
files (pacol.4)



JONAS & ASSOCIATES INC.
Environmental Consultants

2815 Mitchell Drive, Suite 209 • Walnut Creek, CA 94598 • Tel: (510) 933-5360 • Fax: (510) 933-5362

February 23, 1996

Ms. Eva Chu
Hazardous Materials Specialist
Division of Hazardous Materials
Department of Environmental Health
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 94502
(510) 567-6762

Subject: Transmittal of the "Groundwater Monitoring Report, Sampling Round Eleven, PACO Pumps, 9201 San Leandro Street, Oakland, California".

Project: PACO Pumps, Inc.
9201 San Leandro Street, Oakland, California
J&A #: PCO-220

Dear Eva:

Attached is the February 23, 1996 "Groundwater Monitoring Report, Sampling Round Eleven, PACO Pumps, 9201 San Leandro Street, Oakland, California". This report presents data associated with groundwater sampling round eleven and the second round after the Oxygen Release Compound (ORC) was placed into monitoring well 9MW3. After two more sampling rounds have been performed, we would like to discuss decreasing the sampling periodicity.

Thank you for your time.

Sincerely,
JONAS AND ASSOCIATES INC.
Mark L. Jonas
Mark L. Jonas, R.G.
Project Manager

2/28/96
No significant changes in
TPH-G/BTEX concentrations since
ORC placed in well MW-3.

attachment: One copy of the February 23, 1996 "Groundwater Monitoring Report, Sampling Round Eleven, PACO Pumps, 9201 San Leandro Street, Oakland, California".

cc: see attached Distribution List.

6ltr2-23.pc0

6/17/96 12:03:56
PROJECT: 9201 SAN LEANDRO ST
OAKLAND, CA 94612

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9201 San Leandro Street
Oakland, California 94603

BAEDC

James Baird
Bay Area Employment Development Company
1801 Oakland Boulevard, Suite 300
Walnut Creek, California 94596

Indemnitor

Mr. John Lilla
Newflo Corporation (for Paco Pumps, Inc.)
301 Camp Craft Road, Suite 100
West Lake Hills
Austin, Texas 78746
(512) 314-8500
(512) 314-8511



JONAS & ASSOCIATES INC.
Environmental Consultants

2815 Mitchell Drive, Suite 209 • Walnut Creek, CA 94598 • Tel: (510) 933-5360 • Fax: (510) 933-5362

December 22, 1995

Ms. Eva Chu
Hazardous Materials Specialist
ALAMEDA HEALTH CARE SERVICES AGENCY
Division of Hazardous Materials
Department of Environmental Health
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 94502
(510) 567-6762

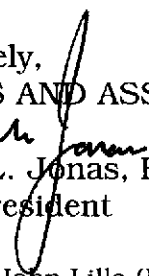
Subject: Confirmation of Conversation on Sampling Frequency.
Project: PACO Pumps, Inc.
9201 San Leandro Street, Oakland, California
J&A #: PCO-220

Dear Eva:

It was good speaking with you on December 14, 1995. As we agreed, after the May 1996 sampling round, PACO Pumps can change to a semi-annual groundwater sampling frequency. In addition, we understand that you will consider changing it to annual sampling if groundwater concentrations have decreased significantly for the next two sampling rounds.

Thank you for your time and consideration.

Sincerely,
JONAS AND ASSOCIATES INC.


Mark L. Jonas, R.G.
Vice President

cc: Mr. John Lilla (Newflo/PACO)
Dr. Vida G. Wright, P.E.
Distribution

5ltr1222.pc0

56 JAN 5 - 1996
11:00 AM
12/22/95

Document Distribution List:

Property: Glass Pak
9201 San Leandro Street
Oakland, California 94603

Small Business Administration
District Counsel
Small Business Administration
211 Main Street, 4th Floor
San Francisco, California 94105

Lender
Kathryn J. Sennott
Senior Loan Officer
Heller First Capital Corporation
650 California Street, 23rd Floor
San Francisco, California 94108

Borrower
Leonard M. Silvani
GP Holding, LLC
9201 San Leandro Street
Oakland, California 94603

BAEDC
James Baird
Bay Area Employment Development Company
1801 Oakland Boulevard, Suite 300
Walnut Creek, California 94596

Seller
Mr. John Lilla
Newflo Corporation (for Paco Pumps, Inc.)
301 Camp Craft Road, Suite 100
West Lake Hills
Austin, Texas 78746
(512) 314-8500
(512) 314-8511

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

ALAMEDA COUNTY-ENV. HEALTH DEPT.
ENVIRONMENTAL PROTECTION DIV.
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577
(510)567-6700

StID 4245

May 5, 1995

Mr. John Lilla
Newflo Corp
301 Camp Craft Rd, Suite 100
West Lake Hills
Austin, TX 78746

RE: Workplan Approval for 9201 San Leandro St, Oakland 94603

Dear Mr. Lilla:

I have completed review of Jonas & Associates Inc.'s May 1995 Oxygen Enhanced Bioremediation Work Plan for the above referenced site. The proposal to use an Oxygen Release Compound (ORC) to enhance intrinsic bioremediation around monitoring well 9MW3 is acceptable. Implementation of the work plan should commence after the May 1995 sampling event. Dissolved oxygen in groundwater should also be measured at this time, prior to the placement of the ORC socks in well 9MW3.

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

Sincerely,

eva chu
Hazardous Materials Specialist

cc: Mark Jonas, 2815 Mitchell Dr, #209, Walnut Creek 94598
files



JONAS & ASSOCIATES INC.
Environmental Consultants

1056 Dale Place • Concord, California 94518 • (510) 676-8554

May 2, 1995

Ms. Eva Chu
Hazardous Materials Specialist
Division of Hazardous Materials
Department of Environmental Health
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 94502
(510) 567-6762

ENVIRONMENTAL
PROTECTION
MAY -11 PM 2:10

Subject: Transmittal of "Oxygen Enhanced Bioremediation Work Plan, PACO Pumps, 9201 San Leandro Street, Oakland, California".

Project: PACO Pumps, Inc.
9201 San Leandro Street, Oakland, California
J&A #: PCO-220

Dear Ms. Chu:

Attached is the May 2, 1995 "Oxygen Enhanced Bioremediation Work Plan, PACO Pumps, 9201 San Leandro Street, Oakland, California". As soon we receive your approval, we will implement the Work Plan.

As always, it is a pleasure working with you.

Sincerely,
JONAS AND ASSOCIATES INC.


Mark L. Jonas
Vice President

attachment: May 2, 1995 "Oxygen Enhanced Bioremediation Work Plan, PACO Pumps, 9201 San Leandro Street, Oakland, California".

cc: Mr. John Lilla (Newflo/Paco)



JONAS & ASSOCIATES INC.

Environmental Consultants

2815 Mitchell Drive, Suite 209 • Walnut Creek, CA 94598 • (510) 933-5360 • (510) 933-5362 Fax

April 5, 1995

Ms. Eva Chu
Hazardous Materials Specialist
Division of Hazardous Materials
Department of Environmental Health
ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
1131 Harbor Bay Parkway
Alameda, California 94502
(510) 567-6762
(510) 337-9335 fax

Subject: Transmittal of "Groundwater Monitoring Report Sampling Round Eight"
Project: PACO Pumps, Inc.
9201 San Leandro Street, Oakland, California
J&A #: PCO-220

Dear Eva:

This is a letter of transmittal for the "Groundwater Monitoring Report, Sampling Round Eight, PACO Pumps, Inc., 9201 San Leandro Street, Oakland, California".

Please call if you have any questions or comments. We plan to collect Round Nine groundwater samples this May in accordance with your March 9, 1995 letter titled "Sampling Frequency at Former Paco Pumps, Inc. 9201 San Leandro St, Oakland 94603".

Thank you for your time and support.

Sincerely,
JONAS AND ASSOCIATES INC.

Mark L. Jonas
Mark L. Jonas
Principal

*check MCLs for DCA
.5ppb*

attachment: Groundwater Monitoring Report

cc: Mr. John Lilla (VP - NEWFLO/PACO)
Dr. Vida G. Wright, P.E.

95 APR 10 PM 3:41
ENVIRONMENTAL
PROTECTION

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

StID 4245

March 9, 1995

Mr. John Lilla
Newflo Corp
301 Camp Craft Rd, Suite 100
West Lake Hills
Austin, TX 78746

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

**RE: Sampling Frequency at Former Paco Pumps, Inc, 9201 San
Leandro St, Oakland 94603**

Dear Mr. Lilla:

In our meeting of March 2, 1995 your consultant, Mr. Mark Jonas, requested if the sampling frequency and analyses for target compounds sought could be modified. Upon review of the files, the following changes may be implemented:

1. Sample well MW-1 annually for TPH-G and BTEX;
2. Sample well MW-2 semi-annually for TPH-G, BTEX, Cl-HC, and sample quarterly for TPH-MO;
3. Sample well MW-3 quarterly for TPH-G, BTEX, and Cl-HC;
4. Sample well MW-4 quarterly for TPH-G and BTEX; and
5. Sample well MW-5 semi-annually for TPH-G, BTEX, and Cl-HC.

It is my understanding you plan to proceed as soon as possible, following approval of a workplan, with oxygenation of well MW-3. If the levels of benzene show a significant decrease following two additional sampling events, after implementation of oxygenation, a risk assessment may not be necessary for this site. To verify the effectiveness of oxygenation, additional borings may be required to collect grab groundwater samples near well MW-3.

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

eva chu
Hazardous Materials Specialist

cc: Mark Jonas, 2815 Mitchell Dr, Ste 209, Walnut Creek 94598
files

Alameda County Department of Environmental Health
Hazardous Materials Division

88 Swan Way, Rm. 200, Oakland, CA 94621
Ph: 510-271-4320 FAX: 510-569-4757

1131 Harbor Bay Parkway
(510) 567-6700

Meeting Attendees

Subject 9201 San Leandro St. Oakland

Date 3/2/95

Location ACDEH

Name	Affiliation	Phone # / FAX #
1 <u>evachu</u>	<u>Alameda Co Health</u>	<u>510 567-6767</u>
2 <u>Doug Lacey</u>	<u>Glass Pak</u>	<u>510-635-7700 / 510-635-0767</u>
3 <u>JOAN LILLA</u>	<u>NEWFO CORP/PALO</u>	<u>512-314-8500</u>
4 <u>Thomas Nelson</u>	<u>Glass Pak</u>	<u>510-635-8024</u>
5 <u>Rickard Sutter</u>	<u>Sutterland Co</u>	<u>843-0772</u>
6 <u>Mark Jonas</u>	<u>Jonas & Associates Inc.</u>	<u>(510) 933-5360 / 5362</u>
7		/
8		/
9		/
10		/
11		/
12		/
13		/
14		/
15		/
16		/
17		/



JONAS & ASSOCIATES INC.
Environmental Consultants

(510) 933-5360
Walnut Creek, California

FAX/TELECOPY TRANSMITTAL

From: Mark Jonas	of: JONAS & ASSOCIATES INC.	FAX #: (510) 933 - 5362
To: Eva Chu	of: Alameda County	FAX #: (510) 337 - 9335

Date: 2 / 13 / 1995	Project: 9201 PACO
Time: 1 am / <u>pm</u>	J&A Project #: PCO-220

Attachments:
1)
2)
3)

Number of attached pages (not including transmittal page): 0

Message:

Eva:

Mr. John Lilla (VP PACO Pumps/Newflo) will be in California for a few days and would like to meet with you to discuss the PACO Pumps 9201 San Leandro Street project. If it is possible, we would like to meet at your office (or conference room) at 10 am on Thursday, March 2, 1995. Please call back to confirm this meeting date and time. Other participants will probably be Mr. Richard Sutherland (Real Estate Agent) and Mr. Mark Silvani (Glass Pak owner/manager).

I understand your off for a few day. I hope you and your family are having an enjoyable vacation.

Sincerely,

mj
Mark Jonas

Distribution: (1)

(2)



JONAS & ASSOCIATES INC.
Environmental Consultants

*See
1/20/95*

2815 Mitchell Drive, Suite 209 • Walnut Creek, CA 94598 • (510) 933-5360 • (510) 933-5362 Fax

January 15, 1995

Ms. Eva Chu
Hazardous Materials Specialist
Division of Hazardous Materials
Department of Environmental Health
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 94502
(510) 567-6762

*Ⓢ what is 120 ppb found in diesel range in
mw-5?*

Subject: Transmittal of the "Groundwater Monitoring Report, Sampling Round Seven, PACO Pumps, 9201 San Leandro Street, Oakland, California".

Project: PACO Pumps, Inc.
9201 San Leandro Street, Oakland, California
J&A #: PCO-220

Dear Ms. Chu:

Attached is the January 15, 1995 "Groundwater Monitoring Report, Sampling Round Seven, PACO Pumps, 9201 San Leandro Street, Oakland, California". This report presents data associated with the seventh groundwater sampling round.

Sincerely,
JONAS AND ASSOCIATES INC.

Mark L. Jonas
Mark L. Jonas
Principal

attachment: One copy of the January 15, 1995 "Groundwater Monitoring Report, Sampling Round Seven, PACO Pumps, 9201 San Leandro Street, Oakland, California".

00:18:11 81 JAN 18 95
Hazardous
Materials
Section



JONAS & ASSOCIATES INC.

Environmental Consultants

OCT 20 PM 4:11

2815 Mitchell Drive, Suite 209 • Walnut Creek, CA 94598 • (510) 933-5360 • (510) 933-5362 Fax

October 17, 1994

Ms. Eva Chu
Hazardous Materials Specialist
Department of Environmental Health
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 94502
(510) 567-6762; (510) 337-9335 fax

Subject: Transmittal of October 15, 1994 "Groundwater Monitoring Report, Sampling Round Six, PACO Pumps, 9201 San Leandro Street, Oakland, California".

Project: PACO Pumps, Inc.
9201 San Leandro Street, Oakland, California
J&A #: PCO-220

Dear Eva:

Attached is the October 15, 1994 "Groundwater Monitoring Report, Sampling Round Six, PACO Pumps, 9201 San Leandro Street, Oakland, California".

Thank you for your time and please call us if you have any questions or comments.

Sincerely,
JONAS AND ASSOCIATES INC.

Mark L. Jonas
Mark L. Jonas
Principal

attachment: One copy of the October 15, 1994 "Groundwater Monitoring Report, Sampling Round Six, PACO Pumps, 9201 San Leandro Street, Oakland, California".

cc: Mr. John Lilla (Newflo Corporation)
Dr. Vida G. Wright, P.E.

*Can watch attenuation of PII 6, BTEX
in this 3 months qualitative risk assessment
or ① A response to speed up degradation.*

10¹⁰ - 10³⁰



JONAS & ASSOCIATES INC.

Environmental Consultants

2815 Mitchell Drive, Suite 209 • Walnut Creek, CA 94598 • (510) 933-5360 • (510) 933-5362 Fax

July 5, 1994

Ms. Eva Chu
Hazardous Materials Specialist
Department of Environmental Health
Alameda County Health Care Services Agency
80 Swan Way, Room 350
Oakland, California 94621
(510) 271-4530; (510) 569-4757 fax

RECEIVED
MAY 26 1994
ST. VINCENT DE PAUL
9:12

Subject: Transmittal of June 28, 1994 "Groundwater Monitoring Report, Sampling Round Five, PACO Pumps, 9201 San Leandro Street, Oakland, California".
Project: PACO Pumps, Inc.
9201 San Leandro Street, Oakland, California
J&A #: PCO-220

Dear Eva:

Attached is the June 28, 1994 "Groundwater Monitoring Report, Sampling Round Five, PACO Pumps, 9201 San Leandro Street, Oakland, California" for the May 26, 1994 sampling event.

As mentioned in the June 13, 1994 letter from Mr. John Lilla, we would like to arrange a meeting with you and the project manager for the Saint Vincent DePaul site. We would like to have this meeting before July 29, 1994. We need to talk to arrange a meeting time convenient to all the parties.

Thank you for your support.

Sincerely,
JONAS AND ASSOCIATES INC.

Mark L. Jonas
Mark L. Jonas
Principal

*8/1/94 Meeting may be more prudent after St Vincent de Paul installs D & well from storm drain. Then we will have data to discuss.
Also, rail road spur could be been source of 1,2 DCA, from previous practice, not just from drums which were stored along property line.*

attachment: One copy of the June 28, 1994 "Groundwater Monitoring Report, Sampling Round Five, PACO Pumps, 9201 San Leandro Street, Oakland, California".

cc: Mr. John Lilla (Newflo Corporation)
Dr. Vida G. Wright, P.E.

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

StID 4245

July 1, 1994

Mr. Mark Jonas
2815 Mitchell Dr, Suite 209
Walnut Creek 94598

**Subject: Workplan Approval for Paco Pumps, 9201 San Leandro St.
Oakland 94603**

Dear Mr. Jonas:

I have completed review of Jonas & Associates' June 1994 Workplan for Installation of Monitoring Well 9MW5 for the above referenced site. The proposal to install a monitoring well downgradient of 9MW3 is acceptable. Field work should commence by August 17, 1994. Please notify this office at least 72 hours prior to the start of field activities. Quarterly monitoring/sampling of all wells should continue at this site until further notice.

Be advised, this department is requiring the adjacent site, St. Vincent de Paul, to conduct a groundwater investigation. We have not received a workplan for the proposed work, to date, but it is anticipated in the near future.

Since our office is in the midst of relocating, phone lines will not be available until the end of next week. In the meantime, I may be reached via (510) 271-4330, if you have any questions or comments.

Sincerely,

eva chu
Hazardous Materials Specialist

cc: John Lilla, Newflo Corp, 80 E. Sir Francis Drake Blvd, #1
Larkspur, CA 94939

files

pacol.2

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 4245

May 4, 1994

Mr. John Lilla
Newflo Corporation
80 E. Sir Francis Drake Blvd, Suite 1
Larkspur, CA 94939

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

**Subject: Additional Investigation at the Former Paco Pumps, Inc,
9201 San Leandro St., Oakland 94603**

Dear Mr. Lilla:

I have completed review of Jonas & Associates' April 1994 Ground Water Monitoring Report for the above referenced site. This report summarized the results of groundwater sampling to date at the site.

At this time additional investigations are required to delineate the extent of the groundwater contaminant plume. Monitoring well MW-3 is detecting elevated levels of petroleum hydrocarbons (up to 40,000 ppb TPH-G, 2,900 ppb benzene), and low levels of chlorinated hydrocarbons. At least one well is required, downgradient from well MW-3. Please submit a workplan for this phase of the investigation within 45 days of the date of this letter.

Also, the next round of sampling should include the analysis for chlorinated hydrocarbons from all monitoring wells. This would help to assess whether chlorinated hydrocarbons are from an offsite source, and/or a common problem in the general vicinity.

Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.

Should you have any questions about the content of this letter, please contact me at (510) 271-4530.

eva chu
Hazardous Materials Specialist

cc: Mark Jonas, 2815 Mitchell Dr, Suite 209, Walnut Creek 94598
files

pacol.1



JONAS & ASSOCIATES INC.
Environmental Consultants

(510) 676-8554
Concord, California

FAX/TELECOPY TRANSMITTAL

From: Mark Jonas	of: JONAS & ASSOCIATES INC.	FAX #: (510) 680 - 6511
To: Eva Chu	of: Alameda Cty. Health	FAX #: (510) 969 - 4757
Date: 2 / 14 / 1994	Project: PACO Pumps	
Time: 1200 am / pm	J&A Project #: PCO-218 / PCO-220	
Attachments:		
1)		
2)		
3)		
Number of attached pages (not including transmittal page): 0		

Dear Eva:

Between January 28 to 31 all of the groundwater wells were sampled at the PACO Pump facilities located at 9201 San Leandro Street and 845 92nd Avenue. The samples are currently being analyzed by ChromaLab, Inc. These represent the fourth round of groundwater samples for each facility. We in conjunction with PACO Pumps will be presenting two reports in March 1994, one for each facility presenting the results of all four sampling rounds. After you have reviewed these upcoming documents, we would like to have a meeting to discuss these projects.

As of March 1, 1994 we will have a new address and phone number, as follows:

New Office: Jonas & Associates Inc.
2815 Mitchell Drive, Suite 209
Walnut Creek, California 94598
(510) 933-5360 phone; (510) 933-5362 fax

We will send you new business cards as soon as they are printed.

In addition, Romena and I, along with an 8-year old boy and Romena's mom, will be in the Holy Land from March 1 through 10. We will be back, in our new office, on Friday, March 11, 1994.

Sincerely,

mj
Mark Jonas

Distribution: (1) John Lilla {(415) 925-3111 fax} (2) Mike Reichlin {(510) 639-3337 fax}
(3) Sonia Pagan-Amado {(713) 934-6052 fax}



JONAS & ASSOCIATES INC.
Environmental Consultants
HAZMAT

1056 Dale Place • Concord, California 94520
93 DEC 20 PM 2:57

2415 Mitchell Dr. W.C.
Suite 209
938-5360

December 16, 1993

Ms. Eva Chu
Hazardous Materials Specialist
Division of Hazardous Materials
Department of Environmental Health
ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
80 Swan Way, Room 350
Oakland, California 94621
(510) 271-4530
(510) 569-4757 fax

Subject: Transmittal of Groundwater Monitoring Report
Project: PACO Pumps, Inc.
9201 San Leandro Street, Oakland, California
J&A #: PCO-220

Dear Eva:

This is a letter of transmittal for the "Groundwater Monitoring Report, Sampling Rounds One, Two, and Three, PACO Pumps, Inc., 9201 San Leandro Street, Oakland, California". Thank you for your patience, I had some personal issues which set us back a little.

Please call if you have any questions or comments. We plan to collect a set of Round Four groundwater samples this January to represent winter groundwater conditions.

Merry Christmas.

Sincerely,
JONAS AND ASSOCIATES INC.

Mark Jonas
Mark L. Jonas
Principal

attachment: Groundwater Monitoring Report

cc: Dr. Vida G. Wright, P.E.
Ms. Sonia Pagan-Amado
Mr. John Lilla



JONAS & ASSOCIATES INC.

Environmental Consultants

1056 Dale Place • Concord, California 94518 • (510) 676-8554

October 14, 1993

Ms. Eva Chu
Hazardous Waste Specialist
Alameda County Health Care Services Agency
Department of Environmental Health
80 Swan Way, Room 350
Oakland, California 94621
(510) 271-4530; (510) 569-4757 fax

Subject: Response to letter from Alameda County Health Care Services Agency
Project: PACO Pumps, 9201 San Leandro Street, Oakland, California
PCO-220

Dear Ms. Chu:

This correspondence is in response to your October 7, 1993 letter (attached) titled "Quarterly Monitoring Reports for PACO Pumps, 9201 San Leandro St., Oakland, 94603". As directed by our client, this summer we performed a third quarter groundwater sampling effort in accord with our previous agreement with your Agency. Water levels were also collected. Recently we had the monitoring wells surveyed by a professional survey firm and therefore we will be able to provide gradient information in our upcoming third quarterly monitoring report. We anticipate having this report to you by the end of the month.

We will also be performing the fourth quarterly groundwater sampling effort in November, 1993. The fourth quarterly sampling report will address the issue of remediation. Currently, we are concerned with the adequacy of characterization of the contamination found on the Saint Vincent DePaul property. Any groundwater remedial effort on the PACO Pumps property should probably be performed in conjunction with an acceptable remedial effort by Saint Vincent DePaul.

Mr. Scott Liddicoat is currently not representing PACO Pumps, Inc. on this project. Future project correspondence should be addressed to:

- » Mr. John Lilla *V.P. Human Resources*
PACO Pumps, Inc.
80 East Sir Francis Drake Boulevard, Suite 1
Larkspur, California 94939
(415) 925-3100; (415) 925-3111 fax

Please call us if you have any questions or comments.

Sincerely
JONAS AND ASSOCIATES INC.

Mark L. Jonas
Mark L. Jonas

cc: Mr. John Lilla

attachment: letter from E. Chu (Alameda County) to S. Liddicoat (PACO Pumps) dated October 7, 1993 titled "Quarterly Monitoring Reports for PACO Pumps, 9201 San Leandro St., Oakland, 94603".

*See
10/18*

93 OCT 15 PM 12:31

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 4245

October 7, 1993

Mr. Scott Liddicoat
Paco Pumps, Inc.
P.O.Box 12924
Oakland, CA 94604-2924

RECEIVED
JJA 10/13/93

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

Subject: Quarterly Monitoring Reports for Paco Pumps, 9201 San Leandro St., Oakland 94603

Dear Mr. Liddicoat:

I have completed review of Jonas & Associates' April 26, 1993 Transmittal of Tables and Figure for Groundwater Sampling for the above referenced site. Groundwater sampling events took place in November 1992 and March 1993. Laboratory analyses confirm that groundwater is impacted by elevated levels of petroleum products.

To date, this office is not in receipt of documentation that the monitoring wells have been surveyed and that gradient has been established. Nor have we received any technical reports of groundwater sampling since March 1993.

At this time, you are directed to reinstate a quarterly schedule of well sampling and monitoring. Technical summary reports documenting each monitoring episode are also due quarterly. Please include gradient information and recommendations if the site can or should be remediated. This schedule shall continue until further notice.

If you have any questions, I can be reached at (510) 271-4530.

Sincerely,

A handwritten signature in cursive script, appearing to read 'eva chu'.

eva chu
Hazardous Materials Specialist

cc: Mark Jonas, 1056 Dale Pl., Concord, CA 94518
files

pac01.1

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

StID 4245

October 7, 1993

Mr. Scott Liddicoat
Paco Pumps, Inc.
P.O.Box 12924
Oakland, CA 94604-2924

**Subject: Quarterly Monitoring Reports for Paco Pumps, 9201 San
Leandro St., Oakland 94603**

Dear Mr. Liddicoat:

I have completed review of Jonas & Associates' April 26, 1993 Transmittal of Tables and Figure for Groundwater Sampling for the above referenced site. Groundwater sampling events took place in November 1992 and March 1993. Laboratory analyses confirm that groundwater is impacted by elevated levels of petroleum products.

To date, this office is not in receipt of documentation that the monitoring wells have been surveyed and that gradient has been established. Nor have we received any technical reports of groundwater sampling since March 1993.

At this time, you are directed to reinstate a quarterly schedule of well sampling and monitoring. Technical summary reports documenting each monitoring episode are also due quarterly. Please include gradient information and recommendations if the site can or should be remediated. This schedule shall continue until further notice.

If you have any questions, I can be reached at (510) 271-4530.

Sincerely,

A handwritten signature in cursive script, appearing to read "eva chu".

eva chu
Hazardous Materials Specialist

cc: Mark Jonas, 1056 Dale Pl., Concord, CA 94518
files

pacol.1

PACO **PUMPS, INC.**

PACO Pumps, Inc.
P.O. Box 12924, 845 92nd Avenue
Oakland, California 94604-2924
(510) 639-3200
FAX: (510) 639-3230

March 2, 1993

Eva Chu
Alameda County Health Agency
Department of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

Dear Ms. Chu,

PACO Pumps, Inc. is submitting this First Quarterly Status Report for the property located at 9201 San Leandro Street, Oakland, California. Mark Jonas and I would like to meet with you, after the second round of quarterly samples has been evaluated, in order to discuss future plans. If you have any questions, you may call me at (510) 559-9107 or Jonas & Associates at (510) 676-8554. Thank you.

Sincerely,



Scott Liddicoat
PACO Pumps, Inc.

attachment: report

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



*EPA
File*

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 4245

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

October 20, 1992

Scott Liddicoat
Paco Pumps
29 Cheshire Ct
Alameda, CA 94501

Subject: Approval of Work Plan for 9201 San Leandro St., Oakland

Dear Mr. Liddicoat:

I have reviewed the Site Characterization Report and Work Plan dated October 16, 1992, prepared by Jonas and Associates, Inc., for the above referenced site. The work plan is acceptable and is approved for implementation. Field work should commence within 30 days of the date of this letter. A report must be submitted within 45 days after completion of this phase of work at the site.

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

Sincerely,

Eva Chu
Hazardous Materials Specialist

cc: Rich Hiett, RWQCB
Mark Jonas, 1056 Dale Place, Concord 94518
Edgar Howell/files

pac01.0

PACO PUMPS

PACO Pumps
P.O. Box 12924, 845 92nd Avenue
Oakland, California 94604-2924
(415) 639-3200 Telex: 33-5312
FAX: (415) 639-3230

9201 SAN LEANDRO STREET

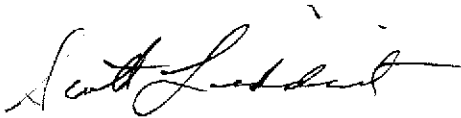
October 16, 1992

Eva Chu
Alameda County Health Agency
Department of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

Dear Ms. Chu,

PACO Pumps, Inc. is submitting this site characterization report and work plan for the property located at 9201 San Leandro Street, Oakland, California. Please review this work plan and advise PACO of your approval. PACO is committed to fulfilling the objectives of this plan. If you have any questions, you may call me at (510) 521-8780 or Jonas & Associates at (510) 676-8554. Thank you.

Sincerely,



Scott Liddicoat
PACO Pumps, Inc.

attachment: report

NOT UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I HAVE DISTRIBUTED THIS INFORMATION ACCORDING TO THE DISTRIBUTION SHOWN ON THE INSTRUCTION SHEET ON THE BACK PAGE OF THIS FORM.
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REPORT DATE M / D / Y 10 / 23 / 91	CASE #	SIGNED	DATE
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REPORTED BY	NAME OF INDIVIDUAL FILING REPORT Scott Liddicoat	PHONE (415) 639-3323	SIGNATURE
	REPRESENTING <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OTHER	COMPANY OR AGENCY NAME PACO Pumps, Inc.	
ADDRESS 9201 San Leandro Street Oakland CA 94603-1237			

RESPONSIBLE PARTY	NAME Amsted Industries Inc. <input type="checkbox"/> UNKNOWN	CONTACT PERSON	PHONE ()
	ADDRESS		

SITE LOCATION	FACILITY NAME (IF APPLICABLE) PACO Pumps, Inc.	OPERATOR PACO Pumps, Inc.	PHONE (415) 639-3323
	ADDRESS 9201 San Leandro Street Oakland CA 94603-1237		
	CROSS STREET 92nd Avenue		

IMPLEMENTING AGENCIES	LOCAL AGENCY Alameda County Health Care, Envir. Health	AGENCY NAME	CONTACT PERSON Mr. Barney M. Chan	PHONE (415) 271-4320
	REGIONAL BOARD			PHONE ()

SUBSTANCES INVOLVED	(1) NAME Metals, Extractable Petroleum Hydrocarbons and Toluene	QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN
	(2)	<input type="checkbox"/> UNKNOWN

DISCOVERY/ABATEMENT	DATE DISCOVERED 07/27/87	HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> TANK TEST <input type="checkbox"/> TANK REMOVAL <input checked="" type="checkbox"/> OTHER Soil Sampling
	DATE DISCHARGE BEGAN <input checked="" type="checkbox"/> UNKNOWN	METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> REMOVE CONTENTS <input type="checkbox"/> CLOSE TANK & REMOVE <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> CLOSE TANK & FILL IN PLACE <input type="checkbox"/> CHANGE PROCEDURE <input type="checkbox"/> REPLACE TANK <input type="checkbox"/> OTHER Not Applicable
	HAS DISCHARGE BEEN STOPPED? <input type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE	N/A

SOURCE/CAUSE	SOURCE OF DISCHARGE <input type="checkbox"/> TANK LEAK <input type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input checked="" type="checkbox"/> OTHER	CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input checked="" type="checkbox"/> SPILL <input type="checkbox"/> CORROSION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER
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CASE TYPE	CHECK ONE ONLY <input type="checkbox"/> UNDETERMINED <input checked="" type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)
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CURRENT STATUS	CHECK ONE ONLY <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED <input type="checkbox"/> POLLUTION CHARACTERIZATION <input type="checkbox"/> LEAK BEING CONFIRMED <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT UNDERWAY <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> REMEDIATION PLAN <input checked="" type="checkbox"/> CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> CLEANUP UNDERWAY
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REMEDIAL ACTION	CHECK APPROPRIATE ACTION(S) <input checked="" type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> VENT SOIL (VS) <input type="checkbox"/> VACUUM EXTRACT (VE) <input type="checkbox"/> OTHER (OT)
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COMMENTS	See Enclosed Report.
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