

Gholami, Amir, Env. Health

From: Angus E. McGrath [amcgrath@secor.com]
Sent: Monday, May 05, 2003 5:44 PM
To: Amir Gholami
Subject: 725 Julie Ann Way

20 354

Amir,

I am contacting you regarding the closure of 725 Julie Ann Way, which is a former Penske facility. I was contacting you to find out what the status was for the request for closure. The last time we spoke you were going to call Barney Chan to discuss the site and potential closure. The only remaining issue is elevated TPHd which is isolated to the down gradient margin of the former tank cavity. I would greatly appreciate your response.

Thanks

Angus...

Angus E. McGrath, Ph.D.
Principal Geochemist

SECOR International Incorporated
57 Lafayette Circle, 2nd Floor
Lafayette, CA 94549
(925) 299-9300 ext. 241
(925) 299-9302 fax
(510) 385-4497 cell
<http://www.secor.com/index2.html>

Soil Bank

From: Angus E. McGrath [amcgrath@secor.com]
Sent: Wednesday, March 26, 2003 1:22 PM
To: Amir Gholami
Subject: Figures for the Penske Julie Ann Way Site (Email 1 of 4)



05OT.50043.00-2N
D ANNUAL EVENT...



05OT.50043-FIG
5.pdf

Amir,

Attached are the figures for the Former Penske 725 Julie Ann Way Site. I have attached both the pdf and dwg files for your review. You can download Volo View from the server at the following website. It is quick to download and will allow you to view the dwg file. There are four figures in the one dwg file. You can view each file by clicking on the "View" menu and selecting "Layout". Figures 5 through 8 will be listed, and you can select whichever you want. Once you have clicked on the Figure title in the menu, click on the upper right hand corner of the menu box to make it go away. You can do the same for each figure until you have looked at each one. To enlarge or shrink the image, click on the "+" "-" button on the toolbar above the image, and then put the cursor on the image, click and hold the button, and drag the cursor towards you to shrink it and away to enlarge. Please give me a call if you have any questions or concerns regarding the data or the operation of Volo View.

Thanks

Angus...



SECOR
INTERNATIONAL
INCORPORATED

www.secor.com
57 Lafayette Circle, 2nd Floor
Lafayette, CA 94549
925-299-9300 TEL
925-299-9302 FAX

January 15, 2003

✓ R0354

AG

✓ R0354

Mr. Barney Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Alameda County
JAN 22 2003
Environmental Health
Alameda County
JAN 22 2003
Environmental Health

**RE: Request for No Further Action
Former Penske Truck Leasing Facility
725 Julie Ann Way
Oakland, California
SECOR Project No. 05OT.50034.00**

Dear Mr. Chan:

Attached please find SECOR's *Second Semiannual Groundwater Monitoring Report for 2002*, describing recent groundwater monitoring and sampling at the former Penske Truck Leasing Facility located at 725 Julie Ann Way in Oakland, California. Groundwater chemical data collected in December 2002 indicate that while dissolved-phase petroleum hydrocarbons continue to be detected in groundwater, no measurable free product is present in groundwater monitoring wells.

Based on previous discussions with Alameda County Environmental Health Services (ACEHS) and on SECOR's understanding of the requirements for 'no further action' status, SECOR recommends that the site be considered for "no further action" at this time.

If you have any questions regarding this letter or the attached report, please contact Richard Saut at (610) 775-6010 or Angus E. McGrath at (925) 299-9300, ext. 241.

Sincerely,

SECOR International Incorporated

Angus McGrath
Principal Geochemist

Enclosure

HAZARDOUS WASTE GENERATOR INSPECTION REPORT

STID #: _____ FACILITY NAME: 725 Julie Ann Way PG. _____ OF _____

SUPPLEMENTAL FORM Site inspection of Aque Grath

MW-7 improved - a few globules and clear gw

MW-1 slight sheen - trailer has some oil
on its sides

MW-4 - slight sheen, fairly clean sample

Do they need a RMP or deed notice?

PRINT NAME: _____ INSPECTED BY: B. CHAN

SIGNATURE: _____ DATE: 2/21/02

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

April 30, 2001
StID #554

Mr. Richard Saut
Penske Truck Leasing Company
Route 10 Green Hills Road
P.O. Box 76335
Reading, PA 19603-7635

Re: Fenton's Reagent Treatment Report for 725 Julie Ann Way, Oakland, CA 94621

Dear Mr. Saut:

Our office has received and reviewed the April 23, 2001 Fenton's Reagent Treatment Report for the referenced site prepared by SECOR International Inc., your consultant. This report gives analytical results from wells after the September 2000 treatment of this site with Fenton's reagent, in an attempt to chemically oxidize the residual dissolved and free petroleum product at the site. As noted in the report, the initial work plan was modified slightly based upon actual field results and observations. Fewer injection points were advanced than originally proposed, a larger volume of acid and hydrogen peroxide was added, a higher density of injection points in the vicinity of wells MW-1 and MW-7 were advanced and a longer post-treatment monitoring period was assessed to evaluate the affect of the treatment.

The following observations can be made at this site:

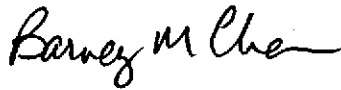
- No apparent dissolution of heavy metals was observed in MW-8, the down-gradient well from the treatment area.
- No pH changes were observed in the monitoring wells within the treatment area indicating the significant buffering capacity of the subsurface soil.
- Estimation of the amount of residual hydrocarbon present in soil and groundwater is difficult. Therefore, the amount of chemical necessary for the treatment cannot be accurately estimated necessitating additional treatment. The presence of free product requires a larger dose of chemical and repeated treatment.
- The affect of the treatment is not immediately observed in groundwater but rather becomes apparent over a longer period of time. Though initial monitoring after chemical treatment did not reflect improvement, subsequent monitoring indicated a significant reduction in dissolved product concentration and the reduction of free product thickness to globules of product.

Because of the residual free product observed in MW-1 and MW-7, SECOR recommends continued treatment of these wells through monthly injections of 8% hydrogen peroxide. Our office concurs with this treatment and also recommends this for all other wells where a sheen or free product is present. Please insure enough time is given to each treated well to equilibrate prior to monitoring.

Mr. Richard Saut
725 Julie Ann Way, Oakland CA 94621
April 30, 2001
StID #554
Page 2

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. McGrath, Secor International Inc., 360 22nd St., Suite 600, Oakland CA 94612
Mr. C. Headlee, SFRWQCB

4Fenton725JAWay

HAZARDOUS WASTE GENERATOR INSPECTION REPORT

STID #: 554 FACILITY NAME: Hertz - Penske PG. OF

SUPPLEMENTAL FORM 725 Julie Ann Way 94621

Present to observe (in progress) the injection of H₂O₂ solution into contaminated Sulf GW area.

At this time ~ 8-10 injection pts completed.

H₂O₂ solution is adjusted to 10% ; no acid adjustment done. (Assume Fe solution used).

Fast Tek - contractor

Injection points marked out @ ~ 3' centers

Expect several more days of application

Injecting @ ~ 9' depth - volume / hole is at least 100 gal ; may need additional H₂O₂

Treatment areas shown in 11/99 wp.

PRINT NAME: _____ INSPECTED BY: B. CHAN

SIGNATURE: _____ DATE: 9/20/00

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

August 16, 2000
STID # 554

Mr. Richard Saut
Penske Truck Leasing Company
Route 10 Green Hills Road
P.O. Box 76335
Reading, PA 19603-7635

**Re: Fenton's Reagent Treatment at Former Penske Truck Leasing, 725 Julie Ann Way,
Oakland CA 94621**

Dear Mr. Saut:

Our office has been in discussion with your consultant, Mr. Angus McGrath of SECOR International, (SECOR) and Mr. Chuck Headlee of the San Francisco Regional Water Quality Control Board (SFRWQCB) regarding the proposal to treat residual diesel contamination at the above referenced site with Fenton's reagent (hydrogen peroxide, iron, acidic solution). We have discussed the efficacy, safety and side reactions of this treatment.

I have also received the results of a recent pilot study, which measured the potential release of soluble heavy metals to groundwater during this treatment. These results do indicate a tendency to release metals from soil not only from the addition of hydrogen peroxide but also through the addition of acids to lower the pH. However, since this test was done in the laboratory, it cannot account for the neutralizing and reduction capability of the native soils at the site. In order to determine if there will be any metal dissolution during actual field conditions, monitoring well MW-8, an immediate down-gradient well from the application area, will be tested for soluble CAM metals. It should also be tested for pH. A contingency plan must be in place should these parameters indicate a potential problem.

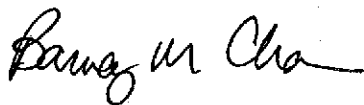
I have also received a mathematical estimation for the amount of hydrogen peroxide required to treat the total petroleum hydrocarbon (TPH) mass estimated to be present in soil and groundwater within the most affected area. Conservative factors have been added to account for the oxidant demand of the soil. It is, therefore, assumed that the proposed volume of hydrogen peroxide will be in excess of the amount actually needed. In any event, should there be significant residual or rebound concentrations of TPH in groundwater after the initial treatment, you should consider an additional treatment. You should also insure that the buffering capacity of the soil is not a factor by monitoring and maintaining the pH within the optimal range.

Given the health hazards and dangers of this chemical, please provide our office a copy of your contractor's health and safety plan. This should include precautions taken to keep the public outside the treatment area.

Mr. Richard Saut
Former Penske Truck Leasing, 725 Julie Ann Way, Oakland CA
StID # 554
August 16, 2000
Page 2.

Your work plan is approved with the condition that you address the above mentioned items.
Please notify our office prior to implementing this work. You may contact me at (510) 567-6765
if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

✓ C: B. Chan, files

Mr. A. McGrath, SECOR International Inc., 360 22nd St., Suite 600, Oakland CA 94612

Mr. C. Headlee, RWQCB

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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

April 19, 2000
StID #554

Mr. Richard Saut
Penske Truck Leasing Company
Route 10 Green Hills Road
P.O. Box 7635
Reading, PA 19603-7635

**Re: Fenton's Reagent Work Plan for Penske Truck Leasing, 725 Julie Ann Way,
Oakland CA 94621**

Dear Mr. Saut:

Our office has received and reviewed SECOR's April 17, 2000 work plan outline for the bench study of the addition of Fenton's reagent to soil from the above site. This study is meant to determine if oxidation of chromium in soils to hexavalent chromium would occur during treatment of petroleum affected soils at this site. The laboratory test will be performed on two 10' deep soil samples taken from within the highest impacted soil area, within the saturated zone. Soil samples will be tested with and without the addition of ferrous sulfate solution. A 100 gram soil sample will be added to 100 ml of a 5% hydrogen peroxide solution with the pH adjusted to 2 with sulfuric and acetic acid. The water sample will be tested for CAM metals after 5 days. SECOR intends to monitor hydrogen peroxide, ferrous iron and hexavalent chromium concentrations over time. Please run pH over time as well.

This work plan is accepted and you may proceed with this bench study as soon as possible. Assuming you get no problematic results, please provide answers to those items in my December 21, 1999 letter in your report of findings from the bench study.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C. B. Chan, files

Mr. A. McGrath, SECOR International Inc., 360 22nd St., Suite 600, Oakland CA 94612
Mr. C. Headlee, RWQCB

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION

1131 Harbor Bay Parkway

Alameda, CA 94502-6577

(510) 567-6700

(510) 337-9432

December 21, 1999
StID # 554

Mr. Richard Saut
Penske Truck Leasing Company
Route 10 Green Hills Road
P.O. Box 7635
Reading, PA 19603-7635

Re: Work Plan for Penske Truck Leasing Facility, 725 Julie Ann Way, Oakland CA 94621

Dear Mr. Saut:

Our office has received and reviewed the November 29, 1999 Fenton's Reagent Treatment Work Plan for the above site as prepared by SECOR. I have discussed this remediation approach with the Water Board and have also spoke with Mr. Angus McGrath of SECOR. The following items were of concern:

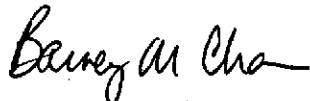
- The concentration of TPH as diesel in groundwater used to estimate the amount of residual contamination should be modified to represent the median concentration of the past four quarters within the wells in the source area.
- Mr. McGrath was going to discuss the merits of specific assumptions made in this estimation including the absorbed hydrocarbon concentration and the ratio of hydrogen peroxide to hydrocarbon.
- Once the amount of peroxide solution needed is determined, our office requests that a map be submitted indicating the locations of the proposed borings.
- Though the work plan called for the injection borings to be approximately 8' in depth, the actual injections would be more in the order of 5' into the aquifer as opposed to the initial two feet.
- Upon discussion with Mr. Chuck Headlee of the Water Board, it is requested that a pilot study be performed to verify the peroxide addition is not causing a deleterious affect in groundwater quality. This could include the oxidation and dissolution of metals and the lowering of groundwater pH. This may be done in-situ or ex-situ. Please have your consultant provide a work plan for this pilot test.
- Your next groundwater monitoring event results would be used in the estimation of the residual petroleum concentration calculation.

Please provide your written response to these items within 45 days or no later than February 8, 2000.

You may contact me at (510) 567-6765 if you have any questions.

Mr. R. Saut
Former Penske Trucking 725 Julie Ann Way, Oakland CA 94621
StID # 554
December 21, 1999
Page 2.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. A. McGrath, SECOR International Inc., 360 22nd St., Suite 600, Oakland CA 94612
Mr. C. Headlee, RWQCB

Fenton 725

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



February 22, 1999
StID # 554

Mr. Richard Saut
Environmental Project Manager
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 196603-7635

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

Re: Former Penske Trucking, 725 Julie Ann Way, Oakland CA 94621

Dear Mr. Saut:

Upon review of your Third Quarter 1998 Groundwater Monitoring and Sampling report from Arcadis Geraghty & Miller (AG&M), our office has the following observations:

- Evidence of natural bio-remediation at this site continues to be lacking. Continued presence of free product is found in wells immediately down-gradient of the former underground tank pit.
- The absence of quarterly monitoring of the bio-degradation parameters does not allow an evaluation of the natural attenuation process.
- The additional removal of groundwater from the impacted monitoring wells has had little effect.

Because of these observations, we request the following:

- Please estimate the amount of oxygen and oxygen-releasing compound necessary to treat the estimated amount of residual hydrocarbon in groundwater. After doing this, please propose a method to introduce the required additional oxygen to this site.
- To monitor the presence and consumption of oxygen in groundwater, please run dissolved oxygen in addition to oxidation-reduction potential (ORP) in all wells on a quarterly schedule. Your consultant continues to propose bi-annual monitoring for these parameters, however, the cost of these analyses is small and the information value significant.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. P. Hehn, Arcadis Geraghty & Miller, 1050 Marina Way South, Richmond, CA 94804

4-725JulieAWay

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

June 25, 1998
StID # 554

Mr. Richard Saut
Environmental Project Manager
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 19603-7635

RE: Former Penske Trucking, 725 Julie Ann Way, Oakland CA 94621

Dear Mr. Saut:

This letter serves to comment on the past, current and future activities regarding the above site. A number of letters have been written commenting on timeliness of reports and proposed and actual corrective actions taken at the site. Our office's intent is to expedite site closure. Currently, the extent of remedial action has consisted of the addition of oxygen releasing compounds, ORC, into the two observation wells installed within the former tank pit. In addition, so called "power purging" has been done to remove additional groundwater beyond what is commonly removed during the monitoring events. To date, these actions have, at best, had limited success. To attest to this, some wells at the site have been monitored since October 1990, while other more "recent" wells have been monitored since September 1994. This seems to be the result of considerable residual diesel and gasoline having been left in-place in the saturated soils during the time of the tank removals. This residual petroleum source manifests itself in on-going sheen and free product in monitoring wells MW-1, MW-4 and MW-7, immediately down-gradient of the tank pits.

It appears that the attempt to remove large volumes of groundwater from the existing wells ie "power purging" has not been very effective in reducing the petroleum mass. Perhaps this is because the volume of water has not been enough to render an impact. Mr. Hehn of Arcadis Geraghty & Miller, AG&M, has been requested to clarify the quantity of water removed and I would appreciate getting this information offered in his June 22, 1998 letter to me. May I suggest, if this method is to be continued, please remove as much water as possible from those wells within the heart of the petroleum plume. This should include removal from the observation wells. The benefit from the removal of contaminated water greatly exceeds the "lost" of oxygenated groundwater from the observation wells.

Mr. Richard Saut
725 Julie Ann Way
StID # 554
June 25, 1998
Page 2.

Given the considerable residual petroleum mass at this site, the introduction of ORC in the two observation wells will not be enough to treat this amount of hydrocarbon. Please have your consultant verify the amount of ORC necessary to treat this site and make any recommendations which may be necessary.

You should also investigate the need to add other nutrients or supplements as necessary to optimize bioremediation. AG&M noted that oxygen and nutrients appeared depleted in the observation wells, however, only ORC was added to these wells. This supports the need to run bioremediation parameters on a regular schedule. The observation wells should be analyzed to see the affect of the assumed increase in dissolved oxygen. The ORC socks are not so cumbersome that they cannot be removed prior to sampling or even purging, if necessary.

Recall, I also requested an assay for hydrocarbon degrading microbes and heterotrophic microbes in my past letter. AG&M mentions the additional cost required for these analyses. I would suggest that monitoring of wells MW-5 and MW-8 be altered to semi-annually to offset these additional monitoring requirements.

Please keep in mind, site closure as a "low risk groundwater case" requires, among other things, a stabilized or shrinking plume. Therefore, the remediation proposed must achieve this goal and as quickly as possible.

In regards to reporting requirements, our office would hope that the 60 days mentioned by AG&M for timeliness of report provision is obtainable. Our office acknowledges that delays may arise due to unexpected circumstances, however, I would point out the following:

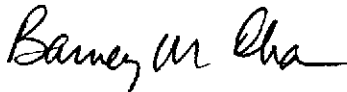
- The report for the installation of the observation wells installed in May 1997 was submitted in AG&M's May 8, 1998 report
- The November 1997 monitoring report was received in March 1998.
- The February 1998 monitoring results was included in the May 8, 1998 Observation Well Installation report. In AG&M's June 22, 1998 letter, they say the first quarter sampling report will be supplied within two weeks. Therefore, the February sampling event will be reported in July.

Please respond to this letter in or along with the upcoming monitoring report.

Mr. Richard Saut
725 Julie Ann Way
StID # 554
June 25, 1998
Page 3.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: ~~B. Chan, files~~

Mr. P. Hehn, Arcadis Geraghty & Miller, 1050 Marina Way South,
Richmond, CA 94804

3-725JAWay



ARCADIS GERAGHTY & MILLER

ARCADIS Geraghty & Miller, Inc.
1970 Broadway, Suite 307
Oakland
California 94710
Tel 510 208 5733
Fax 510 208 5735

TELEFAX

To: Mr. Barney Chan
Alameda County Health Care
Services Agency
Environmental Health Services
Alameda, CA

Copies: Files

Fax: 510-337-9335

Date: 6/22/98

From: Paul V. Hehn

Total pages: 4

Extension: 510-208-5733

Our ref.: RLD0019-0010

Subject:

Western Region

If you do not receive all pages, please call to let us know as soon as possible.

Responses to your May 20, 1998 Letter.

6/23/98

Revised responses with corrected date on letter.

Thanks,

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original

ARCADIS GERAGHTY & MILLER



Mr. Barney M. Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

ARCADIS Geraghty & Miller, Inc.
1970 Broadway, Suite 307
Oakland
California 94710
Tel 510 208 5733
Fax 510 208 5735

WESTERN REGION

Subject:

Response to May 20, 1997 Letter
Former Penske Truck Leasing Company Facility
725 Julie Ann Way
Oakland, California

Richmond, California,
22 June 1998

Dear Mr. Chan:

Contact:
Paul V. Hehn

The following is prepared in response to your letter dated May 20, 1998 to Penske Truck Leasing Co., L.P. (Penske) concerning your comments about the above referenced site. Each of your comments is addressed individually.

Extension:
(510) 208-5733

Comment on the approved field work for installation of two observation wells:

No comment since this issue has been resolved with the submittal of the report on the Observation Well Installation and Biodegradation Enhancement dated May 8, 1998.

Comment on the biodegradation parameters detected in the two observation wells and the addition of ORC™:

The biodegradation parameters for all wells (except Wells OW-1 and OW-2 due to the presents of the ORC™ socks in these wells) were collected during the second quarter (April to June) 1998 quarterly groundwater sampling event as you previously requested in your May 20, 1998 letter. The results of the biodegradation parameters for all wells will be review upon receipt of these analysis. The results of this review of the analysis of the biodegradation parameters will be presented as part of the second quarter groundwater sampling report.

Comment on the collection of biodegradation parameters from all wells:

As stated above, the biodegradation parameters were collected from all wells (except OW-1 and OW-2) during the most recent groundwater sampling event. The collection of samples from Well OW-1 and OW-2 will be performed when it becomes necessary to replace the ORC™ socks in these wells. It is anticipated that the ORC™ socks will

ARCADIS GERAGHTY&MILLER

require replacement in association with the third quarter (July-September) groundwater sampling event. The results of these samples will be reported with the third quarter sample results.

Comment on the collection of Dissolved Oxygen and Redox:

The collection of dissolved oxygen (DO) and redox were performed during the second quarter groundwater sampling event. The results of these samples will be reported with the second quarter groundwater sampling report.

Comment on the groundwater removed during the February (first quarter) 1998 groundwater sampling event:

As in previous groundwater sampling events, groundwater was purged from all wells that were sampled during the February 1998 event. The report on the results of the February 1998 groundwater sampling is in final review and should be released to you within two weeks. As discussed in previous reports, the enhanced vacuum extraction method using a vacuum truck does not allow for accurate measurements of the volume of the groundwater extracted. However, the amount of water purged always exceeds the four well volumes necessary prior to sample collection. It is possible to provide an approximate total purge volume extracted from all wells based on the amount of water disposed after each event. If you think that this volume would be helpful to you, this volume can be supplied in future reports.

Comment on DO measurements due to liquid phase petroleum hydrocarbons and additional remediation beyond passive bioremediation:

The comment refers to Section 5.3 in the May 8, 1998 report on the Observation Well Installation and Biodegradation Enhancement at the site. The section indicated that DO could not be collected from Monitoring Wells MW-1, MW-4 and MW-7 located downgradient from the former location of the USTs. It is only in these three downgradient wells that liquid phase petroleum hydrocarbons were detected which prevented the collection of DO, not any of the other wells located at the site. As stated in this report, the addition of the ORC™ socks to enhance the natural biodegradation has shown reductions since the socks were installed in the concentrations of petroleum hydrocarbons in Well MW-4, the closest well downgradient from the former USTs. This trend appear to be continuing and will be reported in the upcoming first quarter groundwater sampling report to be supplied to you within two weeks.

ARCADIS GERAGHTY & MILLER

Comment on if a separate February 1998 groundwater sampling report would be submitted:

As stated above, a February 1998 groundwater sampling report will be presented to you within two weeks.

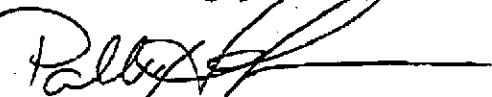
Comment on the submittal time for quarterly groundwater sampling reports:

As stated previously in the cover letter to the Observation Well Installation and Biodegradation Enhancement Report, we normally try to turn the report around within 60 days since the analytical results are normally not received till approximately 2 weeks after the event. Once the results are received, the tables and report are generated. The report then goes through internal review before being forwarded to the client for review. Once client approval is received, the report can be finalized and final copies sent to the client and the regulators. We will continue to strive to meet this schedule whenever possible.

If you have any questions about the above responses, please do not hesitate to contact me at (510) 208-5733.

Sincerely,

ARCADIS Geraghty & Miller, Inc.



Paul Hehn, R.G.
Project Geologist/Project Manager

Copies:

Richard Saut, Penske Truck Leasing Company
Project files

ARCADIS GERAGHTY & MILLER



#554

ARCADIS Geraghty & Miller, Inc.
1970 Broadway, Suite 307
Oakland
California 94710
Tel 510 208 5733
Fax 510 208 5735

TELEFAX

To: Mr. Barney Chan
Alameda County Healthcare
Services Agency
Environmental Health Services
Alameda, CA

Copies: Files

Western Region

Fax: 510-337-9335

Date: 6/22/98

From: Paul V. Hehn

Total pages: 4

Extension: 510-208-5733

Our ref.: R0000 19-0010

Subject:

If you do not receive all pages, please call to let us know as soon as possible.

Responses to your May 20, 1998 Letter.

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ARCADIS GERAGHTY & MILLER



Mr. Barney M. Chan
 Hazardous Materials Specialist
 Alameda County Health Care Services Agency
 Environmental Health Services
 1131 Harbor Bay Parkway, Suite 250
 Alameda, CA 94502-6577

ARCADIS Geraghty & Miller, Inc.
 1970 Broadway, Suite 307
 Oakland
 California 94710
 Tel 510 208 5733
 Fax 510 208 5735

WESTERN REGION

Subject:

Response to May 20, 1997 Letter
 Former Penske Truck Leasing Company Facility
 725 Julie Ann Way
 Oakland, California

Richmond, California,
 11 May 1998

Dear Mr. Chan:

Contact:
 Paul V. Hehn

The following is prepared in response to your letter dated May 20, 1998 to Penske Truck Leasing Co., L.P. (Penske) concerning your comments about the above referenced site. Each of your comments is addressed individually.

Extension:
 (510) 208-5733

Comment on the approved field work for installation of two observation wells:

No comment since this issue has been resolved with the submittal of the report on the Observation Well Installation and Biodegradation Enhancement dated May 8, 1998.

Comment on the biodegradation parameters detected in the two observation wells and the addition of ORC™:

The biodegradation parameters for all wells (except Wells OW-1 and OW-2 due to the presents of the ORC™ socks in these wells) were collected during the second quarter (April to June) 1998 quarterly groundwater sampling event as you previously requested in your May 20, 1998 letter. The results of the biodegradation parameters for all wells will be review upon receipt of these analysis. The results of this review of the analysis of the biodegradation parameters will be presented as part of the second quarter groundwater sampling report.

Why weren't these parameters measured in the OW's?

Comment on the collection of biodegradation parameters from all wells:

As stated above, the biodegradation parameters were collected from all wells (except OW-1 and OW-2) during the most recent groundwater sampling event. The collection of samples from Well OW-1 and OW-2 will be performed when it becomes necessary to replace the ORC™ socks in these wells. It is anticipated that the ORC™ socks will

ARCADIS GERAGHTY & MILLER

*Why can't the one be removed,
well plugged & sampled &
replaced?*

require replacement in association with the third quarter (July-September) groundwater sampling event. The results of these samples will be reported with the third quarter sample results.

Comment on the collection of Dissolved Oxygen and Redox:

The collection of dissolved oxygen (DO) and redox were performed during the second quarter groundwater sampling event. The results of these samples will be reported with the second quarter groundwater sampling report.

Comment on the groundwater removed during the February (first quarter) 1998 groundwater sampling event:

As in previous groundwater sampling events, groundwater was purged from all wells that were sampled during the February 1998 event. The report on the results of the February 1998 groundwater sampling is in final review and should be released to you within two weeks. As discussed in previous reports, the enhanced vacuum extraction method using a vacuum truck does not allow for accurate measurements of the volume of the groundwater extracted. However, the amount of water purged always exceeds the four well volumes necessary prior to sample collection. It is possible to provide an approximate total purge volume extracted from all wells based on the amount of water disposed after each event. If you think that this volume would be helpful to you, this volume can be supplied in future reports.

*2/98 - 7/98
is still too long
to wait wait for report.*

*"power"
I thought purging
was due to remove large
vol. of water not normal
purge volumes.*

Comment on DO measurements due to liquid phase petroleum hydrocarbons and additional remediation beyond passive bioremediation:

The comment refers to Section 5.3 in the May 8, 1998 report on the Observation Well Installation and Biodegradation Enhancement at the site. The section indicated that DO could not be collected from Monitoring Wells MW-1, MW-4 and MW-7 located downgradient from the former location of the USTs. It is only in these three downgradient wells that liquid phase petroleum hydrocarbons were detected which prevented the collection of DO, not any of the other wells located at the site. As stated in this report, the addition of the ORC™ socks to enhance the natural biodegradation has shown reductions since the socks were installed in the concentrations of petroleum hydrocarbons in Well MW-4, the closest well downgradient from the former USTs. This trend appear to be continuing and will be reported in the upcoming first quarter groundwater sampling report to be supplied to you within two weeks.

ARCADIS GERAGHTY & MILLER

Comment on if a separate February 1998 groundwater sampling report would be submitted:

As stated above, a February 1998 groundwater sampling report will be presented to you within two weeks.

Comment on the submittal time for quarterly groundwater sampling reports:

As stated previously in the cover letter to the Observation Well Installation and Biodegradation Enhancement Report, we normally try to turn the report around within 60 days since the analytical results are normally not received till approximately 2 weeks after the event. Once the results are received, the tables and report are generated. The report then goes through internal review before being forwarded to the client for review. Once client approval is received, the report can be finalized and final copies sent to the client and the regulators. We will continue to strive to meet this schedule whenever possible.

Quarterly reports should be received before the next quarter's sampling. Reports should take no longer than 3 mos to be submitted.

If you have any questions about the above responses, please do not hesitate to contact me at (510) 233-3200.

Sincerely,

ARCADIS Geraghty & Miller, Inc.


Paul Hehn, R.G.
Project Geologist/Project Manager

Copies:

Richard Saut, Penske Truck Leasing Company
Project files

ARCADIS GERAGHTY & MILLER

ENVIRONMENTAL
PROTECTION



98 JUN 24 PM 4: 04

ARCADIS Geraghty & Miller, Inc.
1970 Broadway, Suite 307
Oakland
California 94710
Tel 510 208 5733
Fax 510 208 5735

Mr. Barney M. Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

WESTERN REGION

Subject:

Response to May 20, 1997 Letter
Former Penske Truck Leasing Company Facility
725 Julie Ann Way
Oakland, California

Richmond, California,
22 June 1998

Dear Mr. Chan:

Contact:
Paul V. Hehn

The following is prepared in response to your letter dated May 20, 1998 to Penske Truck Leasing Co., L.P. (Penske) concerning your comments about the above referenced site. Each of your comments is addressed individually.

Extension:
(510) 208-5733

Comment on the approved field work for installation of two observation wells:

No comment since this issue has been resolved with the submittal of the report on the Observation Well Installation and Biodegradation Enhancement dated May 8, 1998.

Comment on the biodegradation parameters detected in the two observation wells and the addition of ORC™:

The biodegradation parameters for all wells (except Wells OW-1 and OW-2 due to the presents of the ORC™ socks in these wells) were collected during the second quarter (April to June) 1998 quarterly groundwater sampling event as you previously requested in your May 20, 1998 letter. The results of the biodegradation parameters for all wells will be review upon receipt of these analysis. The results of this review of the analysis of the biodegradation parameters will be presented as part of the second quarter groundwater sampling report.

Comment on the collection of biodegradation parameters from all wells:

As stated above, the biodegradation parameters were collected from all wells (except OW-1 and OW-2) during the most recent groundwater sampling event. The collection of samples from Well OW-1 and OW-2 will be performed when it becomes necessary to replace the ORC™ socks in these wells. It is anticipated that the ORC™ socks will

require replacement in association with the third quarter (July-September) groundwater sampling event. The results of these samples will be reported with the third quarter sample results.

Comment on the collection of Dissolved Oxygen and Redox:

The collection of dissolved oxygen (DO) and redox were performed during the second quarter groundwater sampling event. The results of these samples will be reported with the second quarter groundwater sampling report.

Comment on the groundwater removed during the February (first quarter) 1998 groundwater sampling event:

As in previous groundwater sampling events, groundwater was purged from all wells that were sampled during the February 1998 event. The report on the results of the February 1998 groundwater sampling is in final review and should be released to you within two weeks. As discussed in previous reports, the enhanced vacuum extraction method using a vacuum truck does not allow for accurate measurements of the volume of the groundwater extracted. However, the amount of water purged always exceeds the four well volumes necessary prior to sample collection. It is possible to provide an approximate total purge volume extracted from all wells based on the amount of water disposed after each event. If you think that this volume would be helpful to you, this volume can be supplied in future reports.

Comment on DO measurements due to liquid phase petroleum hydrocarbons and additional remediation beyond passive bioremediation:

The comment refers to Section 5.3 in the May 8, 1998 report on the Observation Well Installation and Biodegradation Enhancement at the site. The section indicated that DO could not be collected from Monitoring Wells MW-1, MW-4 and MW-7 located downgradient from the former location of the USTs. **It is only in these three downgradient wells that liquid phase petroleum hydrocarbons were detected which prevented the collection of DO, not any of the other wells located at the site.** As stated in this report, the addition of the ORC™ socks to enhance the natural biodegradation has shown reductions since the socks were installed in the concentrations of petroleum hydrocarbons in Well MW-4, the closest well downgradient from the former USTs. This trend appear to be continuing and will be reported in the upcoming first quarter groundwater sampling report to be supplied to you within two weeks.

2nd
1st qtr rep by July 1998!
2-7 = 5 mos!

ARCADIS GERAGHTY & MILLER

Comment on if a separate February 1998 groundwater sampling report would be submitted:

As stated above, a February 1998 groundwater sampling report will be presented to you within two weeks.

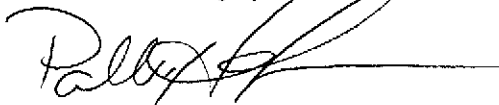
Comment on the submittal time for quarterly groundwater sampling reports:

As stated previously in the cover letter to the Observation Well Installation and Biodegradation Enhancement Report, we normally try to turn the report around within 60 days since the analytical results are normally not received till approximately 2 weeks after the event. Once the results are received, the tables and report are generated. The report then goes through internal review before being forwarded to the client for review. Once client approval is received, the report can be finalized and final copies sent to the client and the regulators. We will continue to strive to meet this schedule whenever possible.

If you have any questions about the above responses, please do not hesitate to contact me at (510) 208-5733.

Sincerely,

ARCADIS Geraghty & Miller, Inc.



Paul Hehn, R.G.
Project Geologist/Project Manager

Copies:
Richard Saut, Penske Truck Leasing Company
Project files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



May 20, 1998
StID # 554

Mr. Richard Saut
Environmental Project Manager
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 19603-7635

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

RE: Former Penske Trucking, 725 Julie Ann Way, Oakland CA 94621

Dear Mr. Saut:

Our office has received and reviewed the May 8, 1998 Arcadis Geraghty & Miller report entitled **Observation Well Installation and Biodegradation Enhancement**. I have also read Mr. Paul Hehn's cover letter attached to this report which responds to my April 10, 1998 letter.

I would like to offer the following comments to this report and Mr. Hehn's letter:

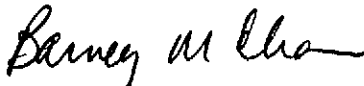
- Although I was notified in May of 1997 of the planned field work for the installation of the two observation wells, because I had not received any report for the installation of these wells, I was not aware that this work had occurred. In addition, the November 1997 monitoring report makes no mention of these observation wells nor are they pictured in any of the figures.
- The results of the analysis of the biodegradation parameters in the two observation wells indicate potential depleted levels of oxygen and nutrients. You should, therefore, consider what can be done to enhance the concentrations of these in groundwater. If dissolved oxygen is low, you should consider installing an array of borings where ORC slurry can be injected into the saturated zone.
- Our office requests that the biodegradation parameters be analyzed in all wells to establish a baseline, background concentration of these parameters. Typically within the heart of the contamination, if biodegradation is occurring, decreases in oxygen, ORP and nutrients are observed. In the absence of oxygen, other electron donors are consumed.
- In regards regular monitoring of these parameters, at a minimum, dissolved oxygen and oxidation-reduction potential (ORP) should be run on all wells during each sampling event. These measurements inexpensive and are done in the field with real time readings.

Mr. Richard Saut
725 Julie Ann Way
StID # 554
May 20, 1998
Page 2.

- Was groundwater removal done from any of the wells during the February 1998 sampling event? This was proposed in the discussion section of the November 1997 monitoring report. You were also asked to clarify the amounts of groundwater removed in past and future purging.
- In this report, page 11 states, "It has not been possible to collect dissolved oxygen measurements during recent sampling event due to higher concentrations of liquid phase petroleum hydrocarbons being present in the wells..." Which wells are they referring to? OW-1 and OW-2 or others? Since there were no dissolved oxygen results reported for any of the wells, one might assume that liquid phase was found in all the wells, however, all the wells were sampled and analyzed, something that is not usually done with wells with liquid phase. These results support my recommendation that something beyond passive bioremediation is necessary at this site.
- Will there be a separate quarterly report for the February 1998 sampling? If not, please provide a groundwater contour map for this event.
- In regards to the timeliness of report submittal, our office would like to receive reports early enough to review, comment and make recommendations for the next quarter's activity, if warranted. To do this, I suggest that a reasonable submittal time is 45 days.

Please provide a written response to this letter **within 30 days or by June 22, 1998**. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B.Chan, files

Mr. P. Hehn, Arcadis Geraghty & Miller, 1050 Marina Way South,
Richmond, CA 94804

ARCADIS GERAGHTY & MILLER ENVIRONMENTAL PROTECTION



98 MAY 11 PM 4:16

ARCADIS Geraghty & Miller, Inc.
1050 Marina Way South
Richmond
California 94804
Tel 510 233 3200
Fax 510 233 3204

Mr. Barney M. Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

WESTERN REGION

Subject:
Observation Well Installation and Biodegradation Enhancement Report
Former Penske Truck Leasing Company Facility
725 Julie Ann Way
Oakland, California

Richmond, California,
11 May 1998

Dear Mr. Chan:

Contact:
Paul V. Hehn

As requested in your letter to Penske Truck Leasing Co., L.P. (Penske), enclosed is a report detailing the installation of two observation wells and the enhancement of natural biodegradation at the former Penske facility referenced above. The original work plan for this activity was presented to your office in a document dated March 31, 1997. This report includes the first six months of enhancement of biodegradation by oxygen release compound (ORC™) as originally approved in your letter dated May 6, 1997.

Extension:
(510) 233-3200

The two observation wells were installed during May 1997. As you will recall, I talked to you on the telephone several days prior to the drilling to notify you of the field activity. At that time you indicated that you were unable to be at that site due to other commitments but you indicated that the work could proceed without your observation. After completion of the observation wells, groundwater samples were collected and analyzed for the biodegradation parameters discussed in your letter. The results of the groundwater sample biodegradation parameter testing indicated that the groundwater was depleted in oxygen and nutrients. Consequently, ORC™ socks were added to the two observation wells in September 1997.

Since the addition of the ORC™ socks, reductions in the concentrations of TPH as gasoline, TPH as diesel and benzene have been detected in immediate downgradient Well MW-4 (refer to Table 3 in report). Reductions in wells further downgradient have not yet been detected.

ARCADIS Geraghty & Miller agrees that the testing of biodegradation parameters are important indicators of biodegradation potential in the groundwater. However, the information gathered at the cost of the analysis does not warrant its analysis with

Comments.

- Biodegradability parameters should, on a one-time basis, be analyzed on all wells. A background conc. needs to be established.

Also suggest

- change mon frequency on MWS to semi-annual or annual
 - need a GW contour map for 2/98 spring event.
 - GW removal S/B in volumes \gg 4 well volumes
- Will there be a 1st qtr report?

each quarterly groundwater sampling event. Annual or semi-annual updates would be a more cost effective and beneficial time frame. It is also not possible to purge or sample Observation Wells OW-1 and OW-2 while the ORC™ socks are in the wells since the socks would have to be removed to get sampling equipment into the well. A costly and time consuming process. It may be better to collect groundwater samples for biodegradation parameters and groundwater analysis when the socks need replacement at the normal six to nine month intervals. Because the ORC™ socks are in the wells, it is also not possible to remove groundwater from the tank pit observation wells.

← can remove ORC

In your April 10, 1998 letter you also indicated that you would like the quarterly groundwater sampling report provided within 30 days of the sampling event. It is the opinion of ARCADIS Geraghty & Miller that this is an unreasonable goal. We normally try to turn the report around within 60 days since the analytical results are normally not received till approximately 2 weeks after the event. Once the results are received, the tables and report are generated. The report then goes through internal review before being forwarded to the client for review. Once client approve is received, the report can be finalized and final copies sent to the client and the regulators. I apologize for the late arrival of the most recent report from November 1997. The week after the sampling was done, I went into the hospital for total hip replacement surgery. I was out of the office from the beginning of December 1997 through the first of February 1998. The reports were not completed until I returned.

If you have any questions about the above responses or the enclosed report, please do not hesitate to contact me at (510) 233-3200.

Sincerely,

ARCADIS Geraghty & Miller, Inc.

Paul Hehn
Project Geologist/Project Manager

Copies:
Project files

Comments

- DO is low in OW S
- State GW depleted of oxygen + nutrients
- Should run ORP + D.O. on all wells, apply
- investigate addnl methods to increase O₂ ORC borings (eg).

• will there be a separate Gw for the 2/27/98 spring? if not need a Gw contour map.

• pit comments: "It has not been possible to collect dissolved oxygen measurements during recent sampling event due to higher concentration of log. phase pet. hydrocarbons being present in the wells Which wells are you referring to? OW-1 & OW-2 or others. There were no D.O. results reported. I assume F.P. was detected in all wells - which is disturbing.

• was Gw purged from any wells like mentioned in the discussion section of the 11/97 report? Clarify quantity of water removed.

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

April 10, 1998
StID # 554

Mr. Richard Saut
Environmental Project Manager
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 19603-7635

RE: Ongoing Subsurface Investigation at Former Penske Trucking, 725 Julie Ann Way,
Oakland CA 94621

Dear Mr. Saut:

Our office has received and reviewed the November 1997 Quarterly Monitoring Report for the above referenced site as prepared by Arcadis Geraghty and Miller. Upon review of the monitoring data, it is apparent that an active remediation approach is necessary for the site. Continued presence of free product observed in monitoring wells MW-1, MW-4 and MW-7 indicate that a continual source of free product exists near the southern portion of the former tank pit. The additional purging done at the time of groundwater sampling is not having a significant impact in reducing dissolved or free product. To continue only monitoring at this site would likely result in a long and costly proposition. In accordance with the Lawrence Livermore National Laboratory (LLNL) report, long term monitoring is recommended only at low risk sites ie sites where the source has been removed, the contaminant plume is stable or shrinking, where no risk to human health or the environment exists and where the site has been adequately characterized. At these sites, passive bioremediation is recommended along with monitoring to insure the effectiveness of this strategy.

It is apparent that the petroleum source has not been removed and there may be a potential risk to human health in localized areas near the tank pit due to the presence of benzene in groundwater. Because the site does not fulfill all the requirements for low risk, a more aggressive remediation approach must be initiated. One attempt which has been previously discussed by Geraghty and Miller is the addition of oxygen releasing compound (ORC) or nitrates to the tank pit to enhance bioremediation. Our office approved the April 17, 1997 proposal to install two observation wells within the former tank pit for the addition of supplements or the removal of water or free product. Please either confirm that this work has occurred or schedule this work immediately if it has not. Please note, I was to be informed prior to this work occurring. In Geraghty and Miller's April 17, 1997 letter, they state that the decision to add nitrate or ORC to the wells will be based upon the results of a pilot test and that the test results would be available soon.

In my May 6, 1997 letter, in addition to approving the proposal to install the two observation wells, I requested the analysis of the bioremediation parameters; dissolved oxygen, oxidation-reduction potential, nitrate, sulfate and iron +2. I also requested that the wells be assayed for total heterotropic and hydrocarbon specific degrading microbes. To date, I am not aware that any of these analyses have been done. **Please institute these analyses immediately.** The microbial count may be done on a one-time basis, however, the other parameters should be done routinely along with your quarterly monitoring.


(ORP + D, O)

In my December 9, 1997 letter, I again requested that prior to the removal of groundwater, the bioremediation parameters should be analyzed in all wells. I also encouraged the removal of groundwater from the tank pit. The total amount of water purged from the wells has never been stated rather the volume has been unspecified,

Mr. Richard Saut
StID # 554
Former Penske Trucking, 725 Julie Ann Way
April 10, 1998
Page 2.

eg > 73 gallons. Obviously, the limited amount of groundwater purging which has occurred has had little impact in remediating the groundwater contamination. If this approach is to continue, you should consider removing a much larger volume of groundwater.

Please provide an updated status and work plan to correct the above items mentioned. Your work plan should address:

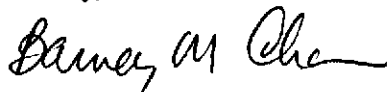
- 
- The incorporation of bioremediation indicator parameter in your QMRs;
 - The installation of observation wells within the tank pit;
 - The analyses and recommendation for the addition of supplements to the monitoring wells;
 - The removal of groundwater and free product from the former tank pit; and
 - The evaluation of other potential viable remediation methods.

Please provide your work plan **within 30 days or by May 11, 1998.**

In addition, please provide your quarterly monitoring reports in a more timely fashion. These reports should be provided within 30 days of the monitoring event. The November 1997 QMR was received by our office on March 18, 1998.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. P. Hehn, Arcadis Geraghty & Miller, 1050 Marina Way South, Richmond CA 94804

725JAWay

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



December 9, 1997
StID # 554

Mr. Richard Saut
Environmental Project Manager
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 19603-7635

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

Re: Former Penske Trucking, 725 Julie Ann Way, Oakland CA 94621

Dear Mr. Saut:

Our office has reviewed the quarterly groundwater reports for the above site up to and including the November 17, 1997 Geraghty & Miller report. Thin layers of free product were reported in wells MW-1, MW-4 and MW-7 and elevated levels of TPHg and TPHd continue to be found in the wells immediately adjacent to the former underground tank pit. Monitoring well MW-8, the "guard well", downgradient of the tank pit has exhibited increasing gasoline and diesel concentrations.

Previously, as a conservative cleanup level for this site, we considered 71 parts per billion benzene (ppb) in groundwater as the maximum concentration allowable to potential discharge to the nearby drainage ditch. We have not, however, been focusing on the Total Petroleum Hydrocarbons concentration. The recent September 1997 result reported 7,000 ppb TPH as diesel. The conservative ecological cleanup level for TPHg and TPHd is 100 ppb based on developmental EC₁₀ data, as is the 71 ppb benzene concentration. It is acknowledged that higher levels of these compounds may be more realistic based upon fate and transport of these contaminants and additional data, however, the recent TPHd levels should be watched.

It appears that the residual soil contamination in the saturated soils beneath the former underground tanks continue to act as a source of TPH. Our office encourages the removal of the source (including free product) and the proposed method of tank pit purging is acceptable. In addition, our office supports enhanced natural bioremediation. To that end, prior to any removal of groundwater, please analyze all monitoring wells for the following parameters: dissolved oxygen, oxidation-reduction potential, nitrate, sulfate and ferrous iron. The need for addition of supplements to the tank pit should be made based upon these results.

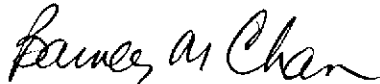
Mr. Richard Saut
725 Julie Ann Way
StID # 554
December 9, 1997
Page 2.

We have the additional observations:

- * There is no need to analyze monitoring wells MW-3 and MW-6.
- * There is no need to run total dissolved solids any longer in groundwater.
- * Please include dissolved oxygen and oxygen-reduction potential on all future monitoring events.

You may contact me at (510) 567-6765 if you have any questions or comments.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
Mr. P. Hehn, Geraghty & Miller, 1050 Marina Way South,
Richmond, CA 94804

4mon725

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

May 6, 1997
StID # 554

Mr. Richard Saut
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 19603-7635

**Re: Former Penske Truck Leasing Facility, 725 Julie Ann Way,
Oakland CA 94621**

Dear Mr. Saut:

Our office has received and reviewed the April 17, 1997 Geraghty and Miller, Inc. (G&M) work plan for the installation of two groundwater observation wells for the above site. As discussed previously with Mr. Paul Hehn of (G&M), our office agrees with this work plan as a method to either remove free product or contaminated water or to add supplements to enhance natural remediation ie ORC (oxygen releasing compounds). After their installation, these wells will be sampled for the analytes; TPHg, TPHd and BTEX. These results will be used to determine how these wells can be best utilized.

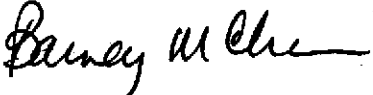
This work plan is approved with the following conditions:

1. Please add the analyte MTBE to the original list. This chemical of concern, which has been used in gasoline since 1980 has not been previously tested for at this site. Its toxicity is currently being determined as carcinogenicity is suspected.
2. Please add the analytes; dissolved oxygen, oxidation-reduction potential, nitrate, sulfate and iron +2. These analytes are indicators of natural biodegradation and there are often relationships with these analytes values and the degree of intrinsic remediation. You should also consider having the wells assayed for total heterotrophic and hydrocarbon specific degrading microbes. The chemical analytes should be monitored along with each sampling event.
3. Please continue to monitor MW-8 until the concentrations of benzene, TPHg or TPHd decrease below the compliance levels in any of the guard wells (71ppb benzene and 100-1000 ppb TPHg or TPHd). Please notify me prior to the well installations.

Mr. Richard Saut
725 Julie Ann Way
StID # 554
May 5, 1997
Page 2.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
Mr. Paul Hehn, Geraghty & Miller, 1050 Marina Way South,
Richmond, CA 94804

3mon725

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

December 6, 1996
StID # 554

Mr. Richard Saut
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 19603-7635

**Re: Former Penske Truck Leasing Facility, 725 Julie Ann Way,
Oakland CA 94621**

Dear Mr. Saut:

Our office has spoke with your consultant, Mr. Paul Hehn of Geraghty and Miller regarding the above site. We discussed items mentioned in my October 23, 1996 letter. Mr. Hehn has since written a November 22, 1996 letter recounting our most recent conversation. In summary, our office agrees with the revised compliance concentration of 71ppb benzene for this site. We also agree with the recommended remedial approach of installing borings within the former tank pit to continue groundwater removal and introduce chemicals to enhance bioremediation. Your next groundwater sampling event will include monitoring well MW-8 and should continue monitoring if the compliance concentration for benzene is exceeded.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
Mr. Paul Hehn, Geraghty & Miller, 1050 Marina Way South,
Richmond, CA 94804

3mon725

November 22, 1996
Project No. RC0019.010

96 NOV 32 AM 10: 46

Mr. Barney Chan
Division of Hazardous Materials
Department of Environmental Health
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Room 250
Alameda, CA 94502

SUBJECT: Response to Letter to Penske Dated October 23, 1996
Former Penske Truck Leasing Facility
725 Julie Ann Way, Oakland, California.

Dear Mr. Chan:

As we discussed during our telephone conversations of November 8 and November 15, 1996, Geraghty & Miller is responding on behalf of Penske Truck Leasing Co. to your letter to Penske dated October 23, 1996.

Your letter indicated that, based on the results of the site specific ecological protection cleanup standards for the San Francisco Airport, the 21 ppb compliance criteria for benzene in estuary waters currently used at this site may be to conservative. You suggested that a 71 ppb level for benzene established at the San Francisco Airport would be more appropriate for this site. As we discussed on November 8, Penske would like to adopt this new compliance level for the "Containment Zone" and applied it to this site. If you are in agreement, we would like to make this new compliance level of 71 ppb ($\mu\text{g/L}$) applied to all trigger and compliance wells valid immediately upon receipt of this letter so that the new compliance level would apply for the Fourth Quarter 1996 sampling event.

Your letter questioned the high concentrations for diesel being extracted from Trigger Well MW-7 at the site. This high level of diesel reflects the effectiveness of the vacuum-enhanced purging being done on the downgradient wells to remove residual petroleum hydrocarbons remaining in the backfill of the former UST excavation. While a significant amount of petroleum hydrocarbons are being removed by this method, we have not as yet seen the expected decrease in the concentrations in the groundwater. We are, however, planning on continuing the vacuum-enhanced purging to continue to remove petroleum



hydrocarbons from the wells downgradient of the tank excavation and from the downgradient groundwater compliance area.

In order to increase the rate of removal of petroleum hydrocarbons from the former tank excavation backfill, Penske proposes to install two 4-inch cased borings into the former tank backfill to be used for additional removal of petroleum hydrocarbons from the source area. These two cased borings will be installed at either end of the former tank excavation, and drilled and completed to the total depth of the tank backfill material (approximately 10 feet below the ground surface). These cased borings will be checked for liquid-phase petroleum hydrocarbons and vacuum-enhanced purging will be used to remove dissolved-phase and liquid-phase petroleum hydrocarbons from the former tank excavation area. These cased boring can also be used for the possible future addition of either Oxygen Release Compound (ORC™) or nitrate to enhance the natural biodegradation of the petroleum hydrocarbons in the subsurface as we discussed during our November 15, 1996 telephone call.

The decision on whether to use ORC™ or nitrate will be established after the installation of the cased borings has been completed, after testing to see if liquid-phase petroleum hydrocarbons are present in the former tank backfill, and will also be based on the results of pilot tests currently being conducted by Geraghty & Miller on the use and results on biodegradation of petroleum hydrocarbons through the use of nitrate addition in brackish groundwater at another petroleum hydrocarbon site in Richmond. The results of this test should be available within three to six months. It is anticipated that the cased borings will be completed within the next three months.

In your letter, you requested that Penske sample Compliance Well MW-8 to check for concentrations of petroleum hydrocarbons in the well since high concentrations of petroleum hydrocarbons are being detected in Trigger Well MW-7. As we discussed, Compliance Well MW-8 will be sampled during the fourth quarter 1996 groundwater sampling event at this site. If the Compliance Well MW-8 is in compliance with the benzene compliance level of 71 ppb ($\mu\text{g/L}$), the well will not be sampled again unless higher than compliance levels for benzene are again detected in the quarterly groundwater samples from Trigger Well MW-7. If the concentrations for benzene detected in the groundwater samples from Trigger Well MW-7 exceed the 71 ppb ($\mu\text{g/L}$) compliance level during future groundwater sampling events, Compliance Well MW-8 will again be sampled during the following quarterly groundwater sampling event. As you requested in your letter, the analytical laboratory will



also be cautioned to use as low a detection limit for benzene as available for the groundwater samples for this site.

If you have further questions about this letter or the responses presented, please do not hesitate to contact the undersigned.

Sincerely,
GERAGHTY & MILLER, INC.



Paul V. Hehn, R.G.
Project Geologist/Project Manager

cc: Mr. Richard G. Saut
Penske Truck Leasing Co.



11/8/96

#554

Conwy P. Hehn of GFM.

use 71 ppb Benzene

use 1000 ppb diesel

- Continue power purging

- add ORC to wells

- add chemicals to tank pit to enhance
bioremediation either ORC or NO_3^-

will write a letter in response soon.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



October 23, 1996
StID # 554

Mr. Richard Saut
Penske Truck Leasing Co., L.P.
Route 10, Green Hills
P.O. Box 7635
Reading, PA 19603-7635

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

**Re: Former Penske Truck Leasing Facility, 725 Julie Ann Way,
Oakland CA 94621**

Dear Mr. Saut:

Our office has received and reviewed the technical reports for the above site up to and including the October 1, 1996 August 1996 groundwater monitoring report prepared by Geraghty & Miller, Inc. This site is being monitored under the "Containment Zone" policy whereby guard or trigger monitoring wells (MW-1, MW-5 and MW-7) are monitored to verify that the concentration of benzene in these wells is below the previously agreed level of 21 ppb, that level assumed protective of estuarine life. Please be aware that this level may be too conservative. In the one case example where site specific ecological protective cleanup standards were developed for the San Francisco Airport, the Regional Water Quality Control Board came up with a Tier 1 Preliminary Saltwater Maximum Groundwater concentration of 71 ppb (ug/l). In addition, cleanup levels for TEX and petroleum fuels was proposed. The proposed cleanup levels for the petroleum hydrocarbons (gasoline, diesel and jet fuel) was 100 ppb, although the Water Board feels that 1000 ppb may be more realistic based on inherent errors of the evaluation.

Nevertheless, the theory of the "Containment Zone" policy calls for monitoring of guard wells to insure that the cleanup level is not exceeded. Should this cleanup level be exceeded, corrective action should be considered.

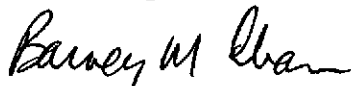
If you examine the current TPH and benzene concentrations, wells MW-1 and MW-7 exceed the cleanup levels for TPH gas and diesel and benzene. Although the benzene concentration in MW-7 for the August 28, 1996 monitoring event was ND (<200), the concentration of benzene was likely in exceedance of 71 ppb due to the dilution performed on the water sample. Please specify to your analytical laboratory that you would like to maintain as low of a detection limit for BTEX as possible. I have discussed this issue with Sequoia Analytical and they state that lower detection limits are possible. You should also sample and monitor MW-8, the well closest to the drainage ditch and the groundwater avenue to the San Leandro Bay.

Mr. Richard Saut
725 Julie Ann Way
StID # 554
October 23, 1996
Page 2.

Please have your consultant discuss whether some type of remediation is now appropriate for this site. The removal of additional water from the monitoring wells has not shown any positive effects, although the long term effect is yet to be seen.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
Mr. Paul Hehn, Geraghty & Miller, 1050 Marina Way South,
Richmond, CA 94804

2mon725



1050 Marina Way South
 Richmond, CA 94804
 (510) 233-3200 • FAX (510) 233-3204

R03574

LETTER OF TRANSMITTAL

DATE 11-10-95	JOB NO. RC0019.009
ATTENTION	
RE:	

TO Mr. Barney Chan
Alameda County Health Care Services
1131 Harbor Bay Parkway, Room 250
Alameda, CA 94502

WE ARE SENDING YOU Attached Under separate cover (via _____) the following items:

Report(s) Prints Plans Samples Specifications

Proposal(s) Contracts _____

COPIES	DATE	NO.	DESCRIPTION
1	11-6-95		Authorization To Release Letter

THESE ARE TRANSMITTED as checked below:

For approval Returned for corrections Resubmit _____ copies for approval

As requested For your use Submit _____ copies for distribution

For review Return _____ corrected prints

For bids due _____ 19 _____ Call to discuss

REMARKS You may have inadvertently received the wrong release letter
attached to the Penske Quarterly Monitoring Report.
Enclosed is the correct copy for your records.
My apologies for any inconvenience.

COPY TO file

SIGNED: *Teresa Payne*
 Teresa Payne



Via Facsimile (510) 233-3204

November 6, 1995

Mr. Paul Hehn
Sr. Geologist
Geraghty & Miller Inc.
1050 Marina Way South
Richmond, CA 94804

Re: Review of Quarterly Monitoring Report
Former Penske Truck Leasing Facility
725 Julie Ann Way
Oakland, CA

Dear Paul:

I have reviewed and approve the above referenced report. Please forward the appropriate number of copies to the required regulatory agencies. If you have questions or need assistance, please call my office at (610) 775-6010.

Sincerely,

Richard G. Saut
Environmental Project Manager

RGS:jl
16110695.rgs

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 19, 1994
StID # 554

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

Mr. Marc Althen
Penske Truck Leasing Co.
Route 10, Green Hills
P. O. Box 563
Reading, PA 19603

**Re: Comment on April 25, 1994 Work Plan and Remedial Approach
for former Penske Truck Leasing Co., 725 Julie Ann Way,
Oakland CA 94621**

Dear Mr. Althen:

Our office has received and reviewed the above referenced report from your consultant, Geraghty and Miller. This letter replies to my March 25, 1994 letter commenting on the original work plan from Geraghty and Miller.

This report proposes to replace the guard well, MW-4, with the new well MW-7 and eliminate the well in the extreme northeast corner of the site. This proposal is acceptable and you may proceed with this field activity along with the preparation of your risk assessment as soon as possible.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Barney M. Chan".

Barney M. Chan
Hazardous Materials Specialist

cc: P. Hehn, Geraghty and Miller, 1050 Marina Way South,
Richmond, CA 94804
R. Arulanantham, RWQCB
E. Howell, files
2APC725

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 25, 1994
StID # 554

Mr. Marc Althen
Penske Truck Leasing Co.
Route 10, Green Hills
P.O. Box 563
Reading, PA 19603

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

**Re: Comment on January 7, 1994 Conceptual Remedial Approach
for Penske Truck Leasing Site, 725 Julie Ann Way, Oakland
CA 94621**

Dear Mr. Althen:

Our office has received and reviewed the above referenced report as prepared and provided by your consultant, Geraghty and Miller. Recall, this report proposes an approach using the following: Alternative Points of Compliance, Risk Assessment, Fate-and-Transport Modeling and Regional Board Resolution 89-39 regarding high dissolved solids.

Our office has met and spoke with Mr. Gary Keyes and Mr. Paul Hehn of Geraghty and Miller and have accepted in theory this approach for site investigation. However, our office has the following comments and requirements:

1. There was some discussion over whether adequate site characterization had been done at this site. Currently, we have only soil and groundwater information from around the original tank pits and from the perimeter of the site. This data comes from the original tank removal samples and from monitoring well data. Our office feels that this data is insufficient. There is obvious attenuation of the soil and groundwater contamination going from the tank pit area to the outlying well, MW-5. Our office will require 2 additional borings between the former tank pit and the perimeter of the site. Please provide a work plan for this work.
2. Please provide your fate-and-transport data using a public domain model. As stated in this conceptual approach, you should show that action levels protective of groundwater and human health will not be exceeded at the perimeter APC wells. You should also provide an appropriate risk assessment to be reviewed by our staff toxicologist.
3. Please expound on what appropriate additional measures will be initiated if concentrations in the sentinel wells were to increase over time and exceed the compliance levels. Our office requires specific actions be detailed.

Mr. Marc Althen
StID # 554
725 Julie Ann Way
March 25, 1994
Page 2.

4. Please provide an indemnification letter stating that Penske Truck Leasing Co. will be responsible for clean-up of all sites if shown to be impacted by off-site migration of from this site.


5. As mentioned in conversation with Mr. Hehn, monitoring wells MW-1 and MW-4 may be used as the guard wells and 21 ppb benzene in groundwater has been suggested based on the California Enclosed Bays and Estuaries Plan from the RWQCB. This compliance level is required in the guard wells to be protective of the appropriate receptor. Although, our office makes no comment on the saltwater criteria presented in the proposal, this level of benzene in groundwater, 21 ppb, should be protective of the other parameters of concern: toluene, xylenes and ethylbenzene. Your human health risk assessment may alter this groundwater compliance level and may also determine a soil cleanup level. In addition, in order to complete your risk assessment, you should run the groundwater sample having the highest diesel concentration via GC/MS method 8270.

6. The locations of the proposed three perimeter wells is acceptable and may be scheduled for installation. Please contact me 2 working days prior to any field activity so I may arrange to be present, if possible.

Please provide a written comment to the above concerns within 30 days or by April 26, 1994.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist



Ravi Arulanantham
Staff Toxicologist

cc: P. Hehn, Geraghty and Miller, 1050 Marina Way South,
Richmond, CA 94804
R. Arulanantham, RWQCB
E. Howell, files APC725

**ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY**



DAVID J. KEARS, Agency Director

March 17, 1994
StID # 554

Mr. Marc Althen
Penske Truck Leasing Co.
Route 10, Green Hills
P.O. Box 563
Reading, PA 19603

Post-It™ brand fax transmittal memo 7671 # of pages 2

To	R. Arulananthan	From	B. Cho
Co.	RWB/CB	Co.	HazMat
Dept.	CALMS	Phone #	AF-TER YOU REVIEW
Fax #	FOR YOUR COMMENT	Fax #	

**Re: Comment on January 7, 1994 Conceptual Remedial Approach
for Penske Truck Leasing Site, 725 Julie Ann Way, Oakland
CA 94621**

Dear Mr. Althen:

Our office has received and reviewed the above referenced report as prepared and provided by your consultant, Geraghty and Miller. Recall, this report proposes an approach using the following: Alternative Points of Compliance, Risk Assessment, Fate-and-Transport and Regional Board Resolution 89-39 regarding high dissolved solids.

Our office has met and spoke with Mr. Gary Keyes and Mr. Paul Hehn of Geraghty and Miller and have accepted in theory this approach for site investigation. However, our office has the following comments and requirements:

1. There was some discussion over whether adequate site characterization had been done at this site. Currently, we have only soil and groundwater information from around the original tank pits and from the perimeter of the site. This data comes from the original tank removal samples and from monitoring well data. Our office feels that this data is insufficient. There is obvious attenuation of the soil and groundwater contamination going from the tank pit area to the outlying well, MW-5. Our office will require additional borings between the former tank pit and the perimeter of the site. Please provide a work plan for this work.
2. Please provide your fate-and-transport data using a public domain model. As stated in this conceptual approach, you should show that action levels protective of groundwater and human health will not be exceeded at the perimeter APC wells. You should also provide an appropriate risk assessment to be reviewed by our staff toxicologist.
3. Please expound on what appropriate additional measures will be initiated if concentrations in the sentinel wells were to increase over time and exceed the compliance levels. Our office requires specific actions be detailed.

Mr. Marc Althen
 StID # 554
 725 Julie Ann Way
 March 18, 1994
 Page 2.

(if shown)

4. Please provide an indemnification letter stating that Penske Truck Leasing Co. will be responsible for clean-up of all others sites shown to be impacted by off-site migration of from this site.

appropriately reception

5. As mentioned in conversation with Mr. Hehn, monitoring wells MW-1 and MW-4 may be used as the guard wells and 21 ppb benzene in groundwater has been established by Mr. Ravi Arulanantham as the compliance level required in the guard wells to be protective of groundwater. Although, our office makes no comment on the saltwater criteria presented in the proposal, this level of benzene in groundwater should be protective of the other parameters of concern, toluene, xylenes and ethylbenzene. Your human health risk assessment may alter this groundwater compliance level and determine a soil cleanup level. In addition, in order to complete your risk assessment, you should run the groundwater sample having the highest diesel concentration via GC/MS method 8270.

suggested based on the Bay Est. protection plan. from RWQCB

6. The locations of the proposed three perimeter wells is acceptable and may be scheduled for installation. Please contact me 2 working days prior to any field activity so I may arrange to be present, if possible.

Please provide a written comment to the above concerns within 30 days or by April 25, 1994.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan
 Hazardous Materials Specialist

Ravi Arulanantham
 Staff Toxicologist

cc: P. Hehn, Geraghty and Miller, 1050 Marina Way South,
 Richmond, CA 94804
 R. Arulanantham, RWQCB
 E. Howell, files APC725

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

December 10, 1993
StID # 554

Mr. Marc Althen
Penske Truck Leasing Co.
Rt. 10 Green Hills P.O. Box 563
Reading, Pennsylvania 19603

**Re: Request for Work Plan and Remediation Plan for 725 Julie Ann
Way, Oakland CA 94621, Hertz-Pensky**

Dear Mr. Althen:

When we met last on June 8, 1993, at our office, with your consultants from Geraghty and Miller, we discussed the various options which were being considered for the investigation, remediation and monitoring of the above site. At that time, your consultants offered the "Alternative Points of Compliance", (APC), along with a Human Health Risk Assessment as the most likely remedial approach for this site. We left this meeting with an understanding that Geraghty and Miller would provide a draft work plan for comment by our office and that of the RWQCB, if necessary. To this date, over six months later, our office has not received the draft work plan as promised. We have, however, received and reviewed the July 1993 and the October 1993 quarterly monitoring reports for this site. As you are aware, these reports indicate significant gasoline, diesel and benzene contamination in monitoring wells MW-1 and MW-4. Given the existing gradient at this site, MW-5 does not adequately represent downgradient contamination from this site.

As part of your work plan, you should examine the criteria of APC and state how each criteria has or will be satisfied. Specifically, complete site characterization is required. Any compromise to groundwater quality must be approved by the Regional Water Quality Control Board (RWQCB). Additional wells will be required to determine the extent of groundwater contamination and to serve as compliance points. An acceptable plan must be submitted to contain and manage the remaining risks posed by residual soil and groundwater contamination. This plan might include institutional controls such as a deed restriction.

In the event that no active remediation is proposed, you should determine the added human health risk represented by the residual contamination at this site. Our office is aware that Geraghty and Miller has contacted our staff toxicologist, Ravi Arulanantham, about reviewing your risk assessment.

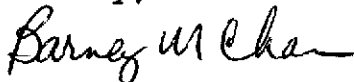
Mr. Marc Althen
725 Julie Ann Way
StID # 554
December 10, 1993
Page 2.

Please be aware that our office will still act as the lead agency for this site. Should you submit, as part of your proposed remedial approach, a risk assessment we will use the services of Ravi, as needed.

Based on the review of all reports and data for this site, the criteria of APC has not been met. Our office also requires the provision of a contingency plan which will be initiated when elevated contamination is detected in the compliance wells for an extended period.

Please provide your work plan, addressing the above requirements, **within 30 days or by January 12, 1994**. You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the requested technical reports may subject you to civil liability. You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
P. Hehn, Geraghty and Miller, Inc., 1050 Marina Way South,
Richmond, CA 94804
Mr. D. McCosker, Independent Construction Co., P. O. Box
5307, Concord CA 94524
R. Arulanantham, ACHCSA
E. Howell, files

2wp725

Gary Keys, Paul Hehn, Marc Althen -

6/8/93 725 Julie Ann Way

- soil contamination left in place evidenced by results from tank removals + boring results from MWS + 3 additional borings BH-1 - BH-3.
 - no over excavation performed after tank removals
- Has. TDS been run?

1. Source removal in question
 2. low yielding soils taken as obvious
Shows that high permeable soils not a pathway
- perform a well survey
 - maybe a condition to obtain N.D. in ^{outlying} wells.
 - Potential Risk Assessment required
 - ~~complete~~ remediation methods if compliance pts impacted
 - Risk Assessment levels for potential additional excavation
 - Fate + transport potentially triggers wells
 - High TDS ~~will~~ not applicable.

Resolution 89-39

Will provide a draft for comment by CIA & RW & CB & setup a meeting for all to attend & discuss concerns

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 17, 1993
StID# 554

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

Mr. Marc Althen
Penske Truck Leasing Co.
Rt 10 Green Hills P.O. Box 563
Reading, Pennsylvania 19603

**Re: Comment on March 17, 1993 Work Plan for Monitoring Well
Installation at 725 Julie Ann Way, Oakland CA 94621**

Dear Mr. Althen:

Our office has received and reviewed the following reports from your consultant, Geraghty and Miller, Inc. :

- * Site Assessment Report Additional Soil and Groundwater Assessment March 15, 1993
- * Results of Quarterly Groundwater Monitoring, January 1993 March 8, 1993
- * Work Plan and Project Budget Estimate for Additional Soil and Groundwater Assessment March 17, 1993.

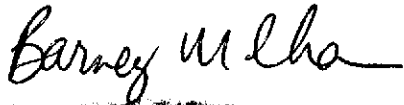
I recently spoke with Mr. Paul Hehn of Geraghty and Miller on May 14, 1993 concerning the status of the investigation and remediation at the above site. First, I would like to give approval for the installation of the three additional wells proposed in the March 17, 1993 workplan. They will serve to determine the extent of groundwater contamination at this site. Next, I would like to summarize the items discussed with Mr. Paul Hehn. This conversation was initiated in order to determine the urgency Penske had for investigating this site. Penske needs to decide on its next investigative steps given the fact that considerable soil and groundwater contamination exists. These steps are beyond the installation of the three proposed monitoring wells. It appears that localized soil contamination exists which is causing the groundwater contamination being detected in MW-1, MW-4 and MW-3.

The option discussed was whether site characteristics for on-going monitoring exist via "alternate points of compliance". This option requires the excavation of highly contaminated soils, localized contamination, low mobility soils and investigating the applicability of soil and groundwater extraction. We agreed that groundwater quality should be determined along with the determination of the extent of soil contamination. After Mr. Hehn has discussed these items with you, please submit a work plan for the additional investigation.

Mr. Marc Althen
725 Julie Ann Way
StID # 554
May 17, 1993
Page 2.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



~~Barney Althen~~
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiatt, RWQCB
P. Hehn, Geraghty & Miller, 1050 Marina Way South, Richmond,
CA 94804
~~B. Howell, RWQCB~~

WP725J

January 22, 1993
Project No. RC01906

03 JAN 27 1993

Mr. Barney Chan
Division of Hazardous Materials
Department of Environmental Health
Alameda County Health Care Services Agency
80 Swan Way
Oakland, CA 94621

SUBJECT: Scheduled Date for Submittal of Additional Work Plan
Former Penske Truck Leasing Facility
725 Julie Ann Way, Oakland, California.

Dear Mr. Chan:

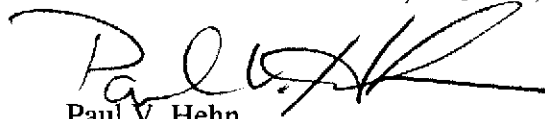
554

In response to your letter of January 4, 1993 to Penske Truck Leasing Co. (Penske) and at the request of Penske, Geraghty & Miller, Inc. is providing a scheduled date for the submittal of an additional work plan for the above referenced facility. This response letter is being submitted to you within the time frame requested in your letter.

The existing work plan for the completion of two additional downgradient ground-water monitor wells at this facility and submitted to your office on November 11, 1992, will be completed within the next two weeks. So that Penske and Geraghty & Miller can utilize the new information available from this drilling to assess what further work might be required, the work plan for additional site assessment will be completed after the results of the soil and water samples from this current drilling are received and reviewed. Based on these results, a work plan for additional assessment will then be prepared and after it is approved by Penske, the work plan will be forwarded to you. Therefore, an additional work plan to more fully determine the extent of possible petroleum hydrocarbons in the soil and ground-water will be submitted to you by March 19, 1993.

If you have any questions, please do not hesitate to call.

Sincerely,
GERAGHTY & MILLER, INC.


Paul V. Hehn
Staff Geologist/Project Manager

cc: Mr. Marc Althen
Penske Truck Leasing Co.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

January 4, 1993
STID # 554

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

Mr. Marc Althen
Penske Truck Leasing Co.
Rt. 10 Green Hills P.O. Box 563
Reading, Pennsylvania 19603

Re: **Evaluation of Work Plan for Additional Soil and Ground
Water Assessment, former Penske Truck Leasing Facility,
725 Julie Ann Way, Oakland, CA 94612**

Dear Mr. Althen:

I have found and reviewed the November 11, 1992 Work Plan for the work described above and have spoken today with Mr. Paul Hehn of Geraghty and Miller, Inc. It appears that the work described in this work plan serves to determine the groundwater and soil contamination only in the downgradient location relative to the initial tank pit. As you are aware, the soil contamination found in the samples from the original tank pull and from the borings from monitoring wells 1-3 indicate areas of undetermined soil contamination. These areas will need to be investigated through an additional work plan addendum as well as the groundwater downgradient to them.

Our office does recognize the merit of the initial boring and well installations and you may proceed with this activity. You are requested to notify me 48 working hours prior to performing this work for potential witnessing of these activities. You are also requested to provide a timetable for the submission of a work plan addendum which fully determines the extent of soil and groundwater contamination. Please provide this addendum within 30 days of receipt of this letter.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Barney M. Chan".

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiett, RWQCB
P. Hehn, Geraghty and Miller, Inc., 1050 Marina Way South,
Richmond, CA 94804
D. McCosker, 908 Forest Ln., Alamo, CA 94507
E. Howell, files *EB* WPAdd725

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

December 30, 1992
STID #554

Mr. Marc Althen
Penske Truck Leasing Co.
Rt 10 Green Hills P.O. Box 563
Reading, Pennsylvania 19603

**Re: Request for Further Subsurface Investigation at Hertz-Pensky,
725 Julie Ann Way, Oakland CA 94621**

Dear Mr. Althen:

Our office has been reviewing the quarterly monitoring reports provided by your consultant, Geraghty and Miller, for some time. As you are aware, quarterly monitoring of the three wells at this site has occurred since their installation in 1990. Over this period from 1990 to present, significant Total Petroleum Hydrocarbons as gasoline and diesel, (TPHg and TPHd), along with benzene, toluene, ethylbenzene and xylenes, (BTEX), has been found in MW-1 and to a lesser degree MW-2 and MW-3. It is appropriate now to request further subsurface investigation to determine the extent of the soil and groundwater contamination.

Recall that the results of the seven soil samples taken from the underground tank removals indicated high TPHg and TPHd concentrations around the perimeter of the common excavation pit of the gasoline and diesel tanks as well as within the waste oil excavation pit. Six borings, three which were converted into MW-1 through MW-3, were later installed to define the extent of soil and groundwater contamination. The December 4, 1989 work plan for Initial Soil and Groundwater Assessment, stated that "additional borings or wells would be drilled at locations 50 to 100 feet from a boring in which hydrocarbons were detected in the field". Unfortunately, this was not done when initial analytical results indicated high gas and diesel soil contamination around the tank pit nor when the results from the borings/monitoring wells gave similar results.

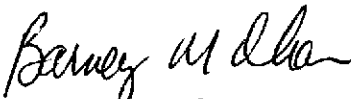
Because of this, the extent of soil and groundwater contamination has yet to be determined. The significant TPHg, TPHd and BTEX being found in MW-1, and the westerly gradient indicates that such contamination is likely migrating offsite. Contamination downgradient to MW-3 is also undetected due to the absence of a well in this location. You are requested to provide our office, **within 45 days**, a workplan addendum which outlines a plan for an assessment which determines the full extent of soil and groundwater contamination.

Mr. Marc Althen
STID #554
725 Julie Ann Way
December 30, 1992
Page 2 of 2.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). All workplans, analytical results or reports should be sent to our office and to that of the Regional Water Quality Control Board (RWQCB) to the attention of Mr. Rich Hiett. Their address is 2101 Webster St., Suite 500, Oakland CA 94612. Be aware that failure to submit the requested documents may subject you to civil liability. In addition, failure to perform the additional subsurface investigation may be considered the improper closure of an underground tank which is a violation of Section 25299 (5) and which also carries significant civil liability.

You may contact me at (510) 271-4530 should you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiett, RWQCB
J. Hawkins, Geraghty and Miller, Inc., 1050 Marina Way South
Richmond, CA 94804
D. McCosker, 908 Forest Lane, Alamo, CA 94507
E. Howell, files

725Req

December 4, 1992
Project No. RC01905

Mr. Barney Chan
Division of Hazardous Materials
Department of Environmental Health
Alameda County Health Care Services Agency
80 Swan Way
Oakland, CA 94621

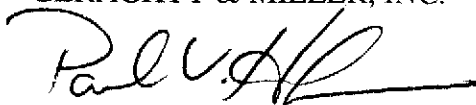
SUBJECT: Results of Quarterly Ground-Water Monitoring, October 1992
Former Penske Truck Leasing Facility
725 Julie Ann Way, Oakland, California.

Dear Mr. Chan:

The above-referenced report is being forwarded to you at the request of Penske Truck Leasing Co. The report details the results of the quarterly ground-water monitoring well sampling for October 1992 at the former Penske Truck Leasing Facility at 725 Julie Ann Way, Oakland. The quarterly sampling has been completed in response to the requirements for ground-water sampling contained in the Alameda County Health Care Services, Department of Environmental Health letter to Penske dated October 24, 1989.

If you have any questions, please do not hesitate to call.

Sincerely,
GERAGHTY & MILLER, INC.



Paul V. Hehn
Staff Geologist/Project Manager

Attachment: Results of Quarterly Ground-Water Monitoring, October 1992

cc: Mr. Marc Althen
Penske Truck Leasing Co.

Mr. D. McCosker c/o
Independent Construction Co 908 Forest Ln
P.O. Box 5307 Alamo CA 94507
Concord CA 94524

P/O

R/P

Mr. Mark Altman
~~Hertz~~ Penske Truck Leasing Co
Route 10, Green Hills
P.O. Box 563
Reading, Pennsylvania 19603

DATE: 7/15/92
TO : Local Oversight Program
FROM: Blum
SUBJ: Transfer of Eligible Oversight Case

Site name: Hertz-Pensky
 Address: 725 Julie Ann Way city Oak zip 94621
 Closure plan attached? Y N DepRef remaining \$ _____
 DepRef Project # 552896 STID #(if any) 554 10,
 Number of Tanks: 4 removed? Y N Date of removal October 1989
 Leak Report filed? Y N Date of Discovery 12/12/89
 Samples received? Y N Contamination: gasoline, diesel, waste oil
 Petroleum Y N Types: Avgas Jet leaded unleaded Diesel
 fuel oil waste oil kerosene solvents
 Monitoring wells on site 3 Monitoring schedule? Y N
 Briefly describe the following:
 Preliminary Assessment _____
 Remedial Action _____
 Post Remedial Action Monitoring _____
 Enforcement Action _____

Comments:
 Oct 1989, 1-10k UL, 1-10k diesel, 1-550 diesel & 1-50 w/o tank removed at site. Fuel/water found under UL & 10k diesel tank. Found elevated TPHg & TPHd in the 6 soil samples around the fuel tank pits & in the soil sample taken from the w/o tank. No overexcavation occurred rather the pit was backfilled & 6 exploratory borings were drilled to define the extent of contamination. - Need to verify that no further excavation occurred, possibly recommend additional well.



GERAGHTY & MILLER, INC. *Paul Hehn*

Environmental Services

1050 Marina Way South
Richmond, CA 94804

(415) 233-3200

FAX (415) 233-3204

LETTER OF TRANSMITTAL

DATE	11-16-90	JOB NO.	RC01903
ATTENTION	Mr. Ariu Levi		
RE:			

TO Division of Hazardous Materials
Department of Environmental Health
80 Swan Way
Oakland, CA 94621

(215) 775-6268
Marc Altheim

ATTN: Mr. Ariu Levi

- WE ARE SENDING YOU Attached Under separate cover via _____ the following items:
- Shop drawings Prints Plans Samples Specifications
- Copy of letter Change order _____

COPIES	DATE	NO.	DESCRIPTION
1	11-15-90		Results of Initial Soil and Ground-water Assessment Activities
			Former Penske Truck Leasing Co. Facility
			725 Julie Ann Way, Oakland, California

NOV 19 10:05 AM '90

THESE ARE TRANSMITTED as checked below:

- For approval Approved as submitted Resubmit _____ copies for approval
- For your use Approved as noted Submit _____ copies for distribution
- As requested Returned for corrections Return _____ corrected prints
- For review and comment _____
- FOR BIDS DUE _____ 19 _____ PRINTS RETURNED AFTER LOAN TO US

REMARKS The above referenced report is being forwarded to you at the request of
Penske Truck Leasing Co. The report details the results of the soil and
ground-water assessment completed at the Former Penske Truck Leasing Facility
at 725 Julie Ann Way, Oakland, to better determine the extent of petroleum
hydrocarbons in the soil and shallow ground water at the site. The assessment
was completed from a work plan submitted and approved by the Alameda County
Department of Environmental Health on September 11, 1990.

COPY TO _____

SIGNED: *Paul Hehn*

September 14, 1990

Mr. Ariu Levi
Division of Hazardous Materials
Department of Environmental Health
80 Swan Way, Room 200
Oakland, California 94621
(415) 271-4320


Re: Revised Workplan for Initial Soil and Ground-Water Assessment, 725 Julie Ann Way,
Oakland, California.
Project No. RC01903

Dear Mr. Levi:

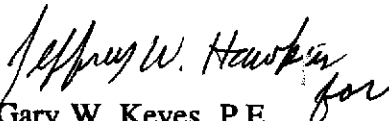
Geraghty & Miller, Inc. is pleased to submit the attached revised workplan, dated September 11, 1990 on behalf of Penske Truck Leasing Co, (Penske) for environmental services at the above referenced location formerly occupied by Penske. The original Workplan, dated December 4, 1989, was prepared at the request of Alameda Health Care Services Agency, Department of Environmental Health, Hazardous Materials Division (ACDEH). This revised workplan has been modified based on comments contained in a letter from ACDEH to Penske dated September 4, 1990, comments from Penske, and additional information supplied to Geraghty & Miller by Penske. The scope of work described in the attached revised workplan is designed to assess the extent of petroleum hydrocarbons in the soil and shallow ground-water in the vicinity of the former location of the underground storage tanks at the project site.

If you have any questions regarding the attached workplan, please do not hesitate to call.

Sincerely,
GERAGHTY & MILLER, INC.



Jeffrey W. Hawkins, R.G.
Senior Geologist



Gary W. Keyes, P.E.
Principal Engineer

cc: Mr. Marc Althen, Penske Truck Leasing Co.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

FACSIMILE TRANSMITTAL

TO: 215 775 6442 Floor/Room # _____
636P
Fax Phone Number

Name: MARC ALTMAN Title/Section _____

Agency: PENSKE LEASING _____

Address: _____

Phone #: () _____

FROM: 415 568 3706 Floor/Room # _____
Fax Phone Number

Date: 9/5/90 Time Sent: _____

Sender: ARIU LEVI Title/Section _____

Phone #: (415) 271 4320 _____

Number of Pages Including Transmittal Sheet: 4

Special Instructions/Comments:



Baines joins A's; McGee follows

See Sports, D-1



Harold Baines

Final Edition

analysis (final) of botanico insect (UC)



DAY MEADOWS HANDICAP 25 cents

re-winning newspaper

Thursday, August 30, 1990

STILL UNHONORED

g game



inspects an A-10 Warthog anti-tank plane.



By Gary Stern, The Tribune sets up IV in naval hospital.

quired for activated reservists. He hasn't heard back yet. But many banks and savings and loans are deferring interest altogether on activated reservists' loans. And Burlington's attitude is that it could be worse.

His wife is also a reservist and they have a 15-month-old son. Luckily, she hasn't also

See RESERVISTS, Page A-6

Military kills pro-Hussein backers in Syria

AMMAN, Jordan — Syrian military forces killed dozens of demonstrators backing Saddam Hussein in protests near the Iraq border, Arab diplomats and security sources reported yesterday. As many as 50,000 troops were deployed along the Iraq-Syria border after the army quelled violent protests Sunday and Monday, according to officials who spoke on condi-

See SYRIA, Page A-6



- Bush's advisors divided on oil policy, A-6
- OPEC nations get OK to up production, B-1

Lead poison common in state

LOS ANGELES — On-the-job lead poisoning is rampant in California, two state-run studies reveal. A medical journal editorial called the findings shocking and said they reflect a national scandal.

A third state study, yet unpublished, estimated at least 2,500 California children under age 17 have potentially toxic levels of lead in their blood because they live near factories that use lead or in homes with lead-based paint.

The research by California's Department of Health Services shows that in the state "you literally have thousands of people exposed to an agent that's been known to be toxic for centuries," said Dr. Kenneth Kizer, the department's director and co-author of two of the studies.

"We can now verify there are substantial numbers of people who are being poisoned," Kizer said earlier this week during a phone interview from Sacramento.

Lead, a toxic metal, is widely used in lead smelters, battery manufacturing plants, brass foundries, construction, radiator repair shops, gun firing ranges and pottery and ceramics plants. Lead poisoning can cause anemia, high blood pressure, stomach upset, constipation, headaches, infertility, miscarriages, possible nervous system and brain damage, convulsions and coma.

The two studies of adult workers were published in the August issue of the American Journal of Public Health.

They demonstrate "there's an epidemic of occupational lead poisoning in California," said Neil Matzlish, chief author of one of the studies and a state epidemiologist in Berkeley. "These data, combined with (earlier research) data from Texas, New York and New Jersey collectively show there is an epidemic of occupational lead poisoning in the United States."

The occupational lead-exposure studies were accompanied by an editorial declaring "The continuing overexposure of American workers to lead and the persistent occurrence of occupational lead poisoning is a national scandal."

The editorial's author, Dr. Philip Landrigan, of New York's Mount Sinai Medical Center, described the studies' results as shocking and said on-the-job

See LEAD, Back Page

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

Certified Mailer: P 062 128 280
September 4, 1990

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

Mr. Marc Althen
Penske Leasing
Route 10 Green Hills
Reading, PA 19603

Re: Underground Fuel Tank Removals
725 Julie Ann Way, Oakland, CA

Dear Mr. Althen:

From conversations with Penske Leasing, it appears the required investigative and remedial work at the site shown above has been on hold pending written approval from this office of the Work Plan submitted by the consulting firm of Geraghty and Miller, Inc.. The plan was reviewed and found to be a generic first phase approach to further evaluation of the extent of contamination, and in conformance with the guidance provided by this office in the October 24, 1989 letter to your office. The lack of written acceptance by this office of the Work Plan was not meant to put this project on hold, nor does it justify the absence of diligent actions to protect waters of the State.

The Work Plan is acceptable to this office with the following points of clarification or change.

1. The Work Plan fails to address the issue of stockpiled soils. All soils removed during the removal of tanks or during any subsequent over excavation must be accounted for. Excavated soils with TPH or TOG levels in excess of 10 ppm (or 50 ppm for TOG by method 503 D&E) must be disposed of at an appropriate landfill. On-site re-use of contaminated soils must be with the San Francisco Regional Water Quality Control Board's (SFRWQCB) approval. On-site re-use of remediated soils is allowed provided the documentation requirements of the SFRWQCB are met.

The Plan must identify the course(s) of action taken to properly handle, dispose of, or remediate all contaminated excavated soil. Documentation must be in the form of manifests, weight tags from Class III facilities, sample analyses, chain of custody forms, sample maps, permits for aeration or Waste Discharge Requirements.

2. The lateral and vertical extent of subsurface soil contamination must be identified to the 100 ppm for TPH g or d or TOG isoconcentration line. Boring to the depths identified is acceptable as a means of evaluating soil contamination with the sampling frequency set at one sample for every five feet of bore. A sampling frequency that varies from this standard must be justified in an amendment to the Work Plan.

Penske
September 4, 1990
Page 2

3. Contaminant assessment of the soil sample from the waste oil pit was incomplete. The accepted Closure Plan requested the soil sample be evaluated for chlorinated hydrocarbons by EPA Method 8010 (prep by method 5030).

The evaluation of the extent of subsurface soil contamination in the area of the former waste oil tank must include an evaluation for chlorinated hydrocarbons by method 8010 or by method 8240. Of course, the use of method 8240 will preclude the need for a separate evaluation for BETX by method 8020.

4. Slug tests to estimate hydraulic conductivity in the area of the tested wells is acceptable to the County. The Division also recommends aquifer stress tests if the results will be used to design ground water remediation options.

If the above changes or requests for clarification are acceptable to Penske Leasing, work at the site can begin without further notice from the Division. An amended Work Plan that includes the above changes should be submitted to this office and the SFRWQCB.

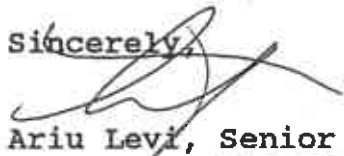
You are reminded of your responsibility to fully address all areas of contamination caused by your organization, and the civil liabilities for failing to act appropriately. You are also reminded of the time table given to your organization in the Division's last letter, and your responsibility to keep this office and the SFRWQCB updated of your progress or lack there of.

Last, you are requested to respond to this office and the SFRWQCB by September 20, 1990 with a report that identifies the status of this case, provides this office with a copy of all manifests for tanks, associated piping, rinsate, and soil, and a time schedule for completing the tasks of the Work Plan and addressing the remaining points of the Division's earlier letter. You are informed that this is a formal request for documentation pursuant to California water Code, section 13267 (b).

Penske
September 4, 1990
Page 3

If you have any questions concerning the contents of this letter please feel free to contact me at 415-271-4320.

Sincerely,



Ariu Levi, Senior Hazardous Materials Specialist
Alameda County Environmental Health

cc: Rafat A. Shahid, Alameda County Environmental Health
Gil Jensen, Alameda County District Attorney's Office,
Consumer and Environmental Protection
Steven Luquire, SFRWQCB
Howard Hatayama, DHS
A McKosker, Property Owner
Jeff Hawkins, Geragthy Miller Inc.
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



September 4, 1990

Mr. Marc Althen
Penske Leasing
Route 10 Green Hills
Reading, PA 19603

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

Re: Underground Fuel Tank Removals
725 Julie Ann Way, Oakland, CA

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Penske
September 4, 1990
Page 2

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Penske
September 4, 1990
Page 3

If you have any questions concerning the contents of this letter please feel free to contact me at 415-271-4320.

Sincerely,



Ariu Levi, Senior Hazardous Materials Specialist
Alameda County Environmental Health

cc: Rafat A. Shahid, Alameda County Environmental Health
Gil Jensen, Alameda County District Attorney's Office,
Consumer and Environmental Protection
Steven LuQuire, SFRWQCB
Howard Hatayama, DHS
McKosker, Property Owner
Jeff Hawkins, Geragthy Miller Inc.
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Certified Mail P 062 128 157

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

August 21, 1990

Mr. Marc Althen
Penske Leasing
Route 10 Green Hills
Reading, PA 19603

Re: Release of Work Plan for 725 Julie Ann Way, Penske Truck Leasing Co.

Dear Mr. Althen:

Alameda County Environmental Health has been requested by Mr. David Mc Cosker, owner of the referenced property, to provide him with a copy of the work plan for site assessment and remediation provided for you by Geraghty and Miller, Inc. We have discussed this with County Counsel and feel this information is public information. If you have any evidence that this information contains anything that would preclude its disclosure please inform our office in writing within ten (10) days of receipt of letter. If we do not receive any reply within this timeframe this information will be released to Mr. Mc Cosker.

Please contact the undersigned should you have any questions regarding this letter.

Sincerely,

Barney Chan for

Ariu Levi
Senior Hazardous Materials Specialist

cc: Mr. Dave Mc Cosker, 740 Julie Ann Way, Oakland CA 94606
Mr. Jeffrey Hawkins, 1050 Marina Way South, Richmond CA 94804

P 062 128 157

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to <i>Mr. Marc Arthur</i>	
Street and No	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3800, June 1985

4/14/01 ENVISION UPDATED

Press [ESC] for the menu

UNDERGROUND STORAGE TANK CLEANUP SITE

SITE ID: 554		SOURCE OF FUNDS: F	LOP:A	TRemov:---	SLIC:--
SITE NAME: Hertz-Penske			SUBSTANCE	:8006619	
SITE ADDRESS: 725		-0 Julie Ann Wy	DATE REPORTED	:12/12/1989	
CITY: Oakland		ZIP CODE: 94621	DATE CONFIRMED	:12/12/1989	
			MULTIPLE RPs	: Y	
CASE TYPE: 0	CONTRACT STAT: 4	PRIORITY: -0-	DATE ER:	-0-	
RP SEARCH	: S		DATE END:	07/20/1992	
PRELIM ASSESSMENT	: -	DATE BEGIN: -0-	DATE END:	-0-	
REMEDIAL INVEST	: -	DATE BEGIN: -0-	DATE END:	-0-	
REMEDIAL ACTION	: -	DATE BEGIN: -0-	DATE END:	-0-	
POST REMED MONITOR:	-	DATE BEGIN: -0-	DATE END:	-0-	
ENFORCEMENT TYPE: 1		DATE ENFORCEMENT ACTION TAKEN:	07/20/1992		
LUFT CATEGORY: 3-		CASE CLOSED: -	DATE CASE CLOSED:	-0-	
DT EXC START : 10/10/1989		REMEDIAL ACTIONS TAKEN:	ED		

PgDn for Screen #2

[ESC] Done [F2] Clear field [Shift-F2] Clear to end [Shift-F10] More
 Form: SITE Table: SITE Field: Source Page: 1

STID: 554

UNDERGROUND STORAGE TANK CLEANUP SITE - SCREEN #2

IN-HOUSE MANAGEMENT:

RISK ASSESSMENT	: -0-	LOC-CleanUp Fund?	-0-
DATE LAST CORSP	:02/22/1999	INSPECTOR INIT:	BC

CONTACT/RESPONSIBLE PARTY INFORMATION:

RP #1: CONTACT: Mssrs. D. Mc Cosker	RP COST: \$0.00
RP COMPANY NAME: -0-	Ph: -0-
ADDRESS: 908 Forest Lane	
CITY/ST/ZIP: Alamo, Ca 94507	
COMMENT: MTBE=ND	

PgUp For Screen #1;PgDn For More RP'S

[ESC] Done [F2] Clear field [Shift-F2] Clear to end [Shift-F10] More
 Form: SITE Table: SITE Field: FlagDate Page: 2

RP seq#: 2-9

ADDITIONAL RP'S -SCREEN # 3

RP #2	
CONTACT NAME: Mr. Marc Althen	Ph: -0-
COMPANY NAME: Penske Truck Leasing Co.	

ADDRESS: Rt10 Green Hills Pobox563
CITY/ST/ZIP: Reading, Pennsylvania 19603

RP #

CONTACT NAME:

Ph:

COMPANY NAME:

ADDRESS:

CITY/ST/ZIP:

RP #

CONTACT NAME:

Ph:

COMPANY NAME:

ADDRESS:

CITY/ST/ZIP:

PgUp for Screen #2; <F7>/<F8> for Next / Previous RP
[ESC] Done [F2] Clear field [Shift-F2] Clear to end [Shift-F10] More
Form: SITE Table: RPs Field: RPseq# Page: 3



December 5, 1989

Mr. Ariu Levi
Division of Hazardous Materials
Department of Environmental Health
80 Swan Way, Room 200
Oakland, California 94621
(415) 271-4320

Re: Workplan for Initial Soil and Ground-Water Assessment, 725 Julie Ann Way,
Oakland, California.
Project No. RC01902

Dear Mr. Levi:

Geraghty & Miller, Inc. is pleased to submit the attached workplan, dated December 4, 1989, on behalf of Penske Truck Leasing Co, (Penske) for environmental services at the above referenced location formerly occupied by Penske. The scope of work presented in the workplan is designed to address the requests for soil and ground-water assessment activities contained in a letter from the Alameda County Health Care Services Agency, Department of Environmental Health to Penske dated October 24, 1989.

If you have any questions regarding the attached workplan, please do not hesitate to call.

Sincerely,
GERAGHTY & MILLER, INC.

A handwritten signature in cursive script that reads "Jeffrey W. Hawkins".

Jeffrey W. Hawkins
Senior Geologist
R.G.# 4361

A handwritten signature in cursive script that reads "Gary W. Keyes".
Gary W. Keyes
Principal Engineer
Civil Engineer # 045065

cc: Mr. Marc Althen, Penske Truck Leasing Co.

11-7-89

 **GERAGHTY
& MILLER, INC.**
Environmental Services

October 31, 1989

Mr. Ariu Levi
Division of Hazardous Materials
Department of Environmental Health
80 Swan Way, Room 200
Oakland, California 94621
(415) 271-4320

Re: Underground Storage Tank Removal, Penske Truck Leasing Co. Facility, 725 Julie
Ann Way, Oakland, California.
Project No. RC01901

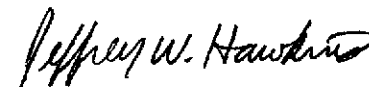
Dear Mr. Levi:

This letter presents an update of the status of the underground storage tank removal project at the Penske Truck Leasing Co. (Penske) facility referenced above. A previous letter from Geraghty & Miller to you dated October 18, 1989, presented Penske's request to begin backfilling the two excavations on Monday October 23, 1989. It is our understanding that Penske subsequently decided to postpone the backfilling operations until receiving a description of what would be required by Alameda County Health Care Services, Department of Environmental Health (ACDEH) after the excavation was backfilled. A description of these requirements was received by Penske in a letter from ACDEH dated October 24, 1989, requesting a workplan to "complete contaminant assessment and begin remediation" (Mr. Marc Althen, Penske, verbal communication, October 30, 1989).

It is our understanding that Penske has contracted Scott Co. in Oakland, California to perform the backfilling operations. As discussed in our telephone conversation on October 31, 1989, the backfilling operations are now scheduled to begin on November 2 or 3, 1989.

If you have any questions, please do not hesitate to call.

Sincerely,
GERAGHTY & MILLER, INC.


Jeffrey W. Hawkins
Senior Geologist


Gary W. Keyes
Associate

cc: Mr. Marc Althen, Penske Truck Leasing Co.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

Certified Mail #P 062 127 687

October 24, 1989

Mr. Marc Althen
Penske Leasing
Route 10 Green Hills
Reading, PA 19603

Subject: Unauthorized Release
Underground Fuel and Waste Oil Tanks
725 Julie Ann Way
Oakland, CA 94606

Dear Mr. Althen:

Thank you for submitting the results for analysis of subsurface soil samples taken in response to the underground tank removals from the above shown facility. Because of the degree of contamination found, this facility is considered to have experienced a confirmed release of petroleum hydrocarbons that has impacted subsurface soil and ground water. The extent of this contamination must be assessed and remediated.

Our office will be the lead agency overseeing both the soil and groundwater remediation of this site. The Regional Water Quality Control Board (RWQCB) is currently unable to oversee the large number of contamination cases within Alameda County and has delegated the handling of this case to our Division. We will be in contact with the RWQCB in order to provide you with guidance concerning the RWQCB's remediation requirements. However, please be aware that you are responsible for diligent actions to protect waters of the State.

To complete contaminant assessment and begin remediation, we require that you submit a work plan which, at a minimum, addresses the items listed below and presents a timetable for their completion. Please submit this workplan within 30 days of the date of this letter.

I. Introduction

- A. Statement of scope of work
- B. Site map showing location of existing and past underground storage tanks
- C. Site History
 - provide historical site use and ownership information. Include a description of types and locations of hazardous materials used on site.

II. Site Description

- A. Vicinity description including hydrogeologic setting
- B. Initial soil contamination and excavation results
 - provide sampling procedures used, and sample map
 - indicate depth to ground water
 - describe soil strata encountered
 - provide soil sampling results, detection limits, chain of custody forms, identity of sampler
 - include results of waste oil pit sample analysis, ie, TOG by 503 D&E, 8240, CAM metals by ICAP or AA, and TPH(G&D) by 5030/8015
 - ground water analysis, ie, TPH(G&D), BTXE
 - describe methods for storing and disposal of all soils
- C. Submit Unauthorized Release Form

III. Plan for determining extent of soil contamination on site

- A. Describe approach to determine extent of lateral and vertical contamination
 - identify subcontractors, if any
 - identify methods or techniques used for analysis
 - provide sampling map showing all lines of excavation and sampling points
 - if a step out procedure is used, define action level for determination of "clean" isopleth
 - provide chain of custody forms, lab analysis results, all receipts and manifests, identity of sampler
- B. Describe method and criteria for screening clean versus contaminated soil. If onsite soil aeration/bioremediation is to be utilized, then provide a complete description of method that includes:
 - volume and rate of aeration/turning
 - method of containment and cover
 - wet weather contingency plans
 - permits obtained

IV. Plan for determining ground water contamination

- Construction and placement of wells should adhere to the requirements of the "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks". Provide a description of placement and rationale for the location of monitoring wells including a map to scale.
- The placement and number of wells must be able to determine the extent and magnitude of the free product and dissolved product plumes.

A. Drilling method for construction of monitoring wells

- expected depth and diameter of monitoring wells
- date of expected drilling
- casing type, diameter, screen interval, and pack and slot sizing techniques
- depth and type of seal
- development method and criteria for adequacy of development
- plans for cuttings and development water

B. Ground water sampling plan

- method for free product measurement, observation of sheen
- well purging procedures
- sample collection procedures
- chain of custody procedures
- procedures for determining ground water gradient

D. Sampling schedule

- measure free product weekly for first month following well installation
- measure free product and dissolved constituents monthly for first three months.
- after first three months monitor quarterly.
- monitoring must occur a minimum of one year.

V. Provide a site safety plan

VI Development of a remediation Plan.

- A. The remediation plan is to include a time schedule for remediation, and, at minimum, must address the following issues:
- removal of all free product. Manual bailing is not acceptable as a recovery system. Actual amount of free product removed must be monitored and tabulated.
 - remediation of contaminated soils and dissolved constituents must follow RWQCB's resolution No. 68-16.
 - soils containing 1,000+ ppm of hydrocarbons must be remediated. Soils containing between 100 and 1,000 ppm must be remediated unless sufficient evidence is provided which indicates no adverse effects on groundwater will occur. Clean up of soils to 100 ppm is strongly recommended.
 - design of remedial action system should be based on a review of hydrogeologic and water quality data and on an evaluation of mitigation alternatives. The determination of probable capture zone(s) of extraction system(s) should be based on aquifer characteristics as determined by aquifer test data

VII Reporting

- A. Technical reports should be submitted with a cover letter from Penske Leasing. The letter must be signed by a principal executive officer or by an authorized representative of that person.
- B. Monthly reports must be submitted for the next three months with the first report due 90 days from the above letter date.
- C. Quarterly reports must be submitted with the first report due 90 days after the final monthly report. These reports should describe the status of the investigation and cleanup.
- D. All reports and proposals must be signed by a California-Certified Engineering Geologist, California Registered Geologist or a California-Registered Civil Engineer (see page 2, 2 June 1988 RWQCB document). A statement of qualifications should be included in

462 127 687

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

PS Form 3800, June 1983

Sent to	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Rush or Delivery Fee	
Return Receipt (including to whom the Date Received)	
Return Receipt (including to whom Date and Address of Delivery)	
TOTAL Postage and Fees	\$
Postmark or Date	

Penske Leasing
October 24, 1989
Page 5

all reports. Initial tank removal and soil sampling does not require such expertise; however, borehole and monitoring well installation and logging, and impact assessments do require such a professional.

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and RWQCB. You should be aware that this Division is working in conjunction with the RWQCB and that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a late response may result in referral of this case to the RWQCB for enforcement and may subject Penske Leasing to civil liabilities imposed by the RWQCB to a maximum amount of \$1,000 per day. Any extensions of agreed upon time deadlines must be confirmed in writing by either this Division of the RWQCB.

Should you have any questions concerning the contents of this letter or the status of this case please feel free to contact me.

Sincerely,


Ariu Levi, Hazardous Materials Specialist
Hazardous Materials Program

cc: Gil Jensen, Alameda County District Attorney, Consumer
Environmental Protection
Rafat Shahid, Assistant Agency Director
Lester Feldman, RWQCB
Howard Hatayama, DOHS
Jeffery Hawkins, Geraghty & Miller
Files

10/23/89



**GERAGHTY
& MILLER, INC.**
Environmental Services

October 18, 1989

ALAMEDA COUNTY
DEPT. OF ENVIRONMENTAL
HAZARDOUS MATERIALS

Mr. Ariu Levi
Division of Hazardous Materials
Department of Environmental Health
80 Swan Way, Room 200
Oakland, California 94621
(415) 271-4320

Re: Underground Storage Tank Removal, Penske Truck Leasing Co. Facility, 725 Julie Ann Way, Oakland, California.

Dear Mr. Levi:


Geraghty & Miller, Inc. (Geraghty & Miller) has been retained by Penske Truck Leasing Co. (Penske) to coordinate the environmental site assessment activities at the Penske facility referenced above. Geraghty & Miller visited the site on October 17, 1989 and met with Mr. Bob Dias of Scott Co., the contractor performing the tank excavations. Two excavations exist on the site. A 1,000 gallon waste oil tank was excavated from a location immediately adjacent to the west side of the building. Three tanks (one 10,000 gallon diesel tank, one 10,000 unleaded gasoline tank, and one 1,000 fresh oil tank) were excavated from a second location beneath the western portion of the site.

Based on the information obtained from Mr. Bob Dias, six soil samples were reportedly collected from the base of the excavation from which the three storage tanks were removed, and one soil sample was collected from the base of the excavation from which the waste oil tank was removed. Total petroleum hydrocarbons (TPH) as diesel were detected in all the soil samples at concentrations ranging from 240 mg/kg to 13,000 mg/kg. Based on these results, Penske plans to backfill the two excavations at the facility and to subsequently prepare a workplan to assess the extent of petroleum hydrocarbons in the soil and any impact to ground water.

Penske plans to backfill the open excavations on Monday, October 23, 1989. According to Mr. Bob Dias, attempts have been made to contact you in order to discuss Penske's plan to backfill the excavations but he has received no response. If this course of action is not acceptable to you, please notify us prior to backfilling on Monday.

If you have any questions, please do not hesitate to call.

Sincerely,
GERAGHTY & MILLER, INC.



Jeffrey W. Hawkins, R.G.
Senior Geologist.



Gary W. Keyes P.E.
Associate

cc: Mr. Marc Althen, Penske Truck Leasing Co.

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5
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**ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
80 SWAN WAY, ROOM 200
OAKLAND, CA 94621
PHONE NO. 415/271-4320**

ACCEPTED

DEPARTMENT OF ENVIRONMENTAL HEALTH
400 - 7th Street, 7th Floor
Oakland, CA 94612
Telephone (415) 271-4320

These plans have been reviewed and found to be accept-
able and essentially meet the requirements of State and
local health laws. Comments to your plans indicated by this
Department are to correct errors, improve clarity and local
laws. The original permit application is on file with the
office of any required officials for enforcement.

One copy of these materials plans and the on file and
available to all collection and enforcement involved with
the review.

Any change or alterations of plans or conditions
must be submitted to the Department of Health and
Building Inspection Department for approval. If such
changes are made, the permit holder is responsible for
notify the Department of Health and Building
Inspection in writing.

Following conditions must be followed:
1. The permit holder must maintain a record of all
materials and equipment used in the remediation
process and submit a report to the Department of
Health and Building Inspection upon completion of the
remediation process.


7/26/85

UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

- Business Name** Penske Leasing
Business Owner Same
- Site Address** 725 Julie Ann Way
City Oakland **Zip** 94606 **Phone** (415) 351-4001
- Mailing Address** Route 10 Green Hills
City Reading, PA **Zip** 19603 **Phone** (215) 775-6000
- Land Owner** Same
Address _____ **City, State** _____ **Zip** _____
- EPA I.D. No.** CAC-00020633
- Contractor** Scott Co.
Address 1919 Market Street
City Oakland, CA 94607 **Phone** (415) 834-2333
License Type A-Gen. Eng. **ID#** 184480
- Consultant** N/A
Address N/A
City N/A **Phone** N/A

8. Contact Person for Investigation

Name Marc Althen Title Manager
Phone (215) 775-6000

9. Total No. of Tanks at facility 3

10. Have permit applications for all tanks been submitted to this office?
Yes [] No []

11. State Registered Hazardous Waste Transporters/Facilities

a) Product/Waste Tranporter

Name N/A EPA I.D. No. _____
Address _____
City N/A State _____ Zip _____

b) ~~Rinsate Transporter~~

~~Name Hydro Chem EPA I.D. No. _____ Dosh #1208
Address Hunters Point Shipped
City San Francisco, State CA Zip 94124~~

c) ~~Tank Transporter~~

~~Name Hydro Chem EPA I.D. No. _____ Dosh #1208
Address Hunters Point Shipyard
City San Francisco, State CA Zip 94124~~

d) ~~Tank Disposal Site~~

~~Name Hydro Chem EPA I.D. No. _____ Dosh #1208
Address Hunters Point Shipyard
City San Francisco, State CA Zip 94124~~

e) Contaminated Soil Transporter

Name N/A EPA I.D. No. N/A
Address N/A
City N/A State N/A Zip N/A

12. Sample Collector

EA
 TO TELLON
 LEFT BRIDGE -
 SW 8th ST AND DAVOS.

Name _____
 Company West Labs
 Address 1046 Olive Drive, Suite 3
 City Davis State CA Zip 95616 Phone (916)735-9500

13. Sampling Information for each tank or area

Tank or Area		Material sampled	Location & Depth
Capacity	Historic Contents (past 5 years)		
8,000 10,000	gasoline	soil	Below tank 1-sample at each end of tank.
10,000	diesel	soil	Below tank 1-sample at each end of tank.
6,000	oil	soil	Below tank 1-sample at each end of tank.
1 SOIL SAMPLE / 20' OF ANTI-OIL PIPE TRENCH.			

14. Have tanks or pipes leaked in the past? Yes [] No [x]

If yes, describe. _____

15. NFPA methods used for rendering tank inert? Yes [x] No []

If yes, describe. Triple rinse 15% dry ice. Explosion meter on site.

An explosion proof combustible gas meter shall be used to verify tank inertness.

16. Laboratories

Name West Labs
 Address 1046 Olive Drive, Suite 3
 City Davis State CA Zip 95616
 State Certification No. 340

17. Chemical Methods to be used for Analyzing Samples

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Number
gasoline	Test for BTX. Total (hydro-chem) for gas ponge and trap. Preparation #503 (EPA).	EPA 80-15 ₃ Modified an. 80-20
diesel	Test for BTX. Total (hydro-chem) for gas ponge and trap. Preparation #503 (EPA).	EPA 80-15 ₅ Modified an. 80-20
oil	Test for BTX. Total (hydro-chem) for gas ponge and trap. Preparation #503 (EPA).	1) EPA 80-15 ₃ 2) Modified an. 80-20 \$ 8010 3) TOG

18. Submit Site Safety Plan

19. Workman's Compensation: Yes No

Copy of Certificate enclosed? Yes No

Name of Insurer Argonaut Insurance Company

20. Plot Plan submitted? Yes No

21. Deposit enclosed? Yes No

22. Please forward to this office the following information within 60 days after receipt of sample results.

- a) Chain of Custody Sheets
- b) Original Signed Laboratory Reports
- c) TSD to Generator copies of wastes shipped and received
- d) Attachment A summarizing laboratory results

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true. I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel and safety.

I will notify the Department of Environmental Health at least two (2) working days (48 hours) after approval of this closure plan in advance to schedule any required inspections. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

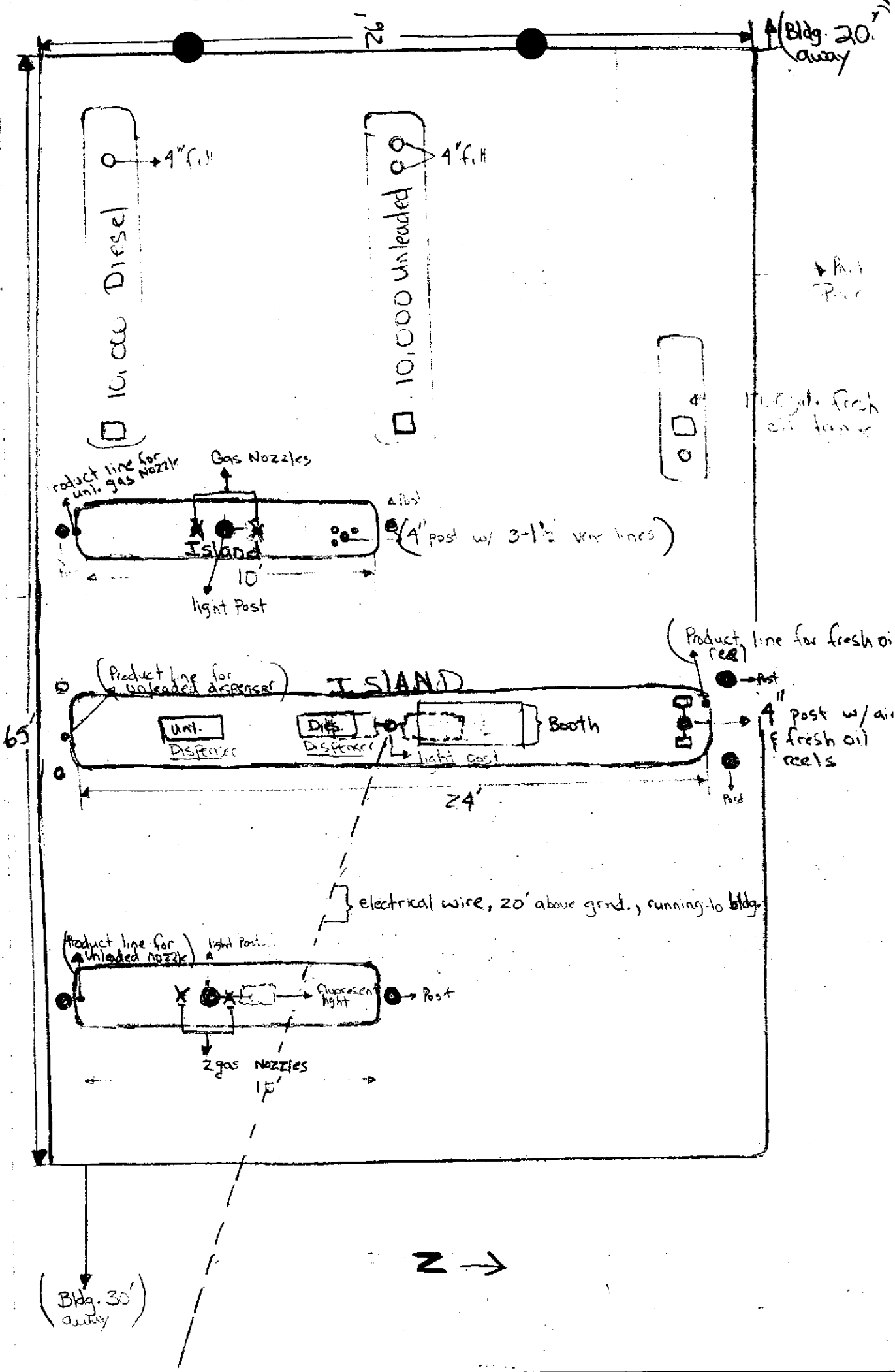
Signature of Contractor

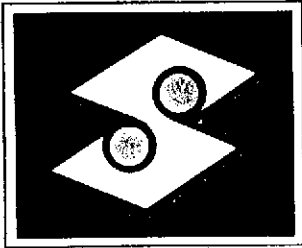
Name (please type) Jay Groh
Signature Jay Groh
Date 9/20/89

Signature of Site Owner or Operator

Name (please type) Marc Attkin
Signature Marc Attkin
Date 9/20/89

- 1) STOCK PILE SAMPLING?
- 2) GROUND WATER PRESENCE - WILL PUMP TRUCK BE ON SITE TO EMPTY PIT TO ALLOW RECHARGE?
- 3) STOCK PILE COVERING?
- 4) MANIFESTS TO INCLUDE ⁵ AT 461, ASSOCIATED PNO





SCOTT CO.

MECHANICAL CONTRACTORS
1919 Market Street
P.O. Box 12954
Oakland, California 94604
(415) 834-2333

Contractors License No. 184480

**SAFETY PLAN
TANK REMOVAL AT 725 JULIE ANN WAY
OAKLAND, CA 94606**

General Contractor: Scott Co. of California
1919 Market Street
Oakland, CA 94607

Project Manager: Jay Groh

On Site Coordinator: Bill McCarthy

Mr. McCarthy will have in his possession two A:B:C: rated fire extinguishers and Type C protective clothing. Also, he will have a first aid kit and telephone numbers of all emergency personnel. He will have respirators, which will be at everyone's disposal.

The explosive meter that can detect the level of oxygen and hydrocarbon, will be supplied by the contractor and operated by Mr. McCarthy. After the tank has been triple rinsed, dry ice will be applied to 15% of the tanks volume.

If any questions should arise in reference to this safety plan, please contact Jay Groh at (415) 834-2333, extension 3380.

JG:cjh

- 1) PROVIDE FENCING FOR PIT ON REV 11.
- 2) WHEN WILL RESPIRATORS BE PROVIDED?

ACORD CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY) 5/1/89

XXXXXXXXXXXX PRODUCER BROKER

RB

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

Corroon & Black
50 California Street
San Francisco, CA 94111
Tel: (415) 981-0600

CODE SUB-CODE

INSURED

Scott Co. of California
Scott Broadway Contractors
1919 Market Street
Oakland, CA 94607

COMPANIES AFFORDING COVERAGE

COMPANY LETTER	A	Argonaut Insurance Company
COMPANY LETTER	B	
COMPANY LETTER	C	
COMPANY LETTER	D	
COMPANY LETTER	E	

COVERAGES

THIS IS TO CERTIFY THAT POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN. THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS, AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	ALL LIMITS IN THOUSANDS	
	GENERAL LIABILITY				GENERAL AGGREGATE	\$ 2,000
A	X COMMERCIAL GENERAL LIABILITY CLAIMS MADE X OCCUR. OWNER'S & CONTRACTORS PROT.	LC 76-490 210969	5/1/89	5/1/90	PRODUCTS-COMP/OPS AGGREGATE	\$ 1,000
					PERSONAL & ADVERTISING INJURY	\$ 1,000
					EACH OCCURRENCE	\$ 1,000
					FIRE DAMAGE (Any one fire)	\$ 50
					MEDICAL EXPENSE (Any one person)	\$ 5
A	X AUTOMOBILE LIABILITY ANY AUTO ALL OWNED AUTOS SCHEDULED AUTOS X HIRED AUTOS X NON-OWNED AUTOS GARAGE LIABILITY	CA 76-490 210970	5/1/89	5/1/90	CSL	\$ 1,000
					BODILY INJURY (Per person)	\$
					BODILY INJURY (Per accident)	\$
					PROPERTY DAMAGE	\$
	EXCESS LIABILITY				EACH OCCURRENCE	\$
	OTHER THAN UMBRELLA FORM				AGGREGATE	\$
A	WORKERS' COMPENSATION AND EMPLOYERS' LIABILITY	WC 76-490 210968	5/1/89	5/1/90	STATUTORY	CA
					\$	1,000 (EACH ACCIDENT)
					\$	1,000 (DISEASE-POLICY LIMIT)
					\$	1,000 (DISEASE-EACH EMPLOYEE)
	OTHER					

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/RESTRICTIONS/SPECIAL ITEMS
All operations performed by or for the Named Insured for the Certificate Holder.

CERTIFICATE HOLDER

Alameda County Health Dept.
470 - 27th Street #332
Oakland, CA 94612

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

927-7570



BAY AREA AIR QUALITY MANAGEMENT DISTRICT

239 ELLIS STREET
SAN FRANCISCO, CALIFORNIA 94109
415/771-6000

REGULATION 8, RULE 40

Aeration of Contaminated Soil and
Removal of Underground Storage Tanks

NOTIFICATION FORM

- Removal or Replacement of Tanks
- Excavation of Contaminated Soil

SITE INFORMATION

SITE ADDRESS 725 Julie Ann Way
 CITY, STATE, ZIP OAKLAND, Ca 94606
 OWNER NAME Hertz Penske
 SPECIFIC LOCATION OF PROJECT Same -

<p>TANK REMOVAL</p> <p>SCHEDULED STARTUP DATE <u>OCT 2, 1989</u></p> <p>VAPORS REMOVED BY:</p> <p><input checked="" type="checkbox"/> WATER WASH</p> <p><input checked="" type="checkbox"/> VAPOR FREEING (CO₂) <u>Dry Ice</u></p> <p><input type="checkbox"/> VENTILATION</p>	<p>CONTAMINATED SOIL EXCAVATION</p> <p>SCHEDULED STARTUP DATE _____</p> <p>STOCKPILES WILL BE COVERED? YES _____ NO _____</p> <p>ALTERNATIVE METHOD OF AERATION (DESCRIBE BELOW) <u>N/A</u></p> <p>(MAY REQUIRE PERMIT)</p>
--	--

CONTRACTOR INFORMATION

NAME SCOTT Co CONTACT JAY Gosh
 ADDRESS 1919 Market St PHONE (415) 834-2333
 CITY, STATE, ZIP OAKLAND, Ca 94607

CONSULTANT INFORMATION (IF APPLICABLE)

NAME _____ CONTACT _____
 ADDRESS N/A PHONE () _____
 CITY, STATE, ZIP _____

FOR OFFICE USE ONLY

DATE RECEIVED _____ BY _____ (INIT.) _____
 CC: INSPECTOR NO. _____ DATE _____ BY _____ (INIT.) _____
 TELEPHONE UPDATE: CALLER _____ CHANGE MADE _____
 BAAQMD N # _____