

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SWT
9-30-05

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

September 28, 2005

Harold Turner
Snow Cleaners, Inc.
38 Sonora Street W
Stockton, CA 95203

Subject: Fuel Leak Case No. RO0000357, Snow Cleaners, 2678 Coolidge Avenue, Oakland, CA
- Work Plan Approval

Dear Mr. Turner:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the documents entitled, "Subsurface Investigation Work Plan - B8 to B14," "Preferential Pathway/Conduit Study," and "Sensitive Receptor Survey," all dated September 12, 2005 and received by ACEH on September 22, 2005. The Subsurface Investigation Work Plan proposes to collect soil samples from planters and landscaped area, advance seven soil borings to assess the lateral and vertical extent of soil and groundwater contamination, and advance six shallow hand auger borings beneath existing structures. ACEH concurs with the proposed scope of work for the subsurface investigation.

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

TECHNICAL COMMENTS

1. **Subsurface Investigation Work Plan.** The proposed scope of work and proposed sampling locations are acceptable.
2. **Preferential Pathway/Conduit Study.** The Preferential Pathway/Conduit Study identified a sanitary sewer lateral located on Davis Street as a potential preferential pathway for contaminant transport. Please incorporate as appropriate, the potential for contaminant transport along this preferential pathway in future discussions of the site conceptual model and contaminant transport.
3. **Sensitive Receptor Survey.** We have no technical comments on the Sensitive Receptor Survey.
4. **Hydrogeologic Cross Sections.** Please incorporate data from the soil borings into one or more hydrogeologic cross sections that depict the soil layers encountered, all soil and groundwater samples collected in the borings, and analytical results for the samples. Please present the cross sections in the Soil and Groundwater Investigation Report requested below.

TECHNICAL REPORT REQUEST

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

- February 17, 2006 - Soil and Groundwater Investigation Report

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

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

Harold Turner
September 28, 2005
Page 3

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

UNDERGROUND STORAGE TANK CLEANUP FUND

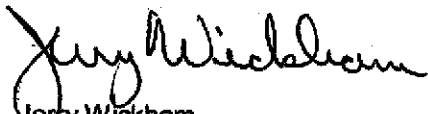
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Paul King
P & D Environmental
55 Santa Clara Avenue, Suite 240
Oakland, CA 94610

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
7-12-05

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

July 11, 2005

Harold Turner
Snow Cleaners, Inc.
38 Sonora Street W
Stockton, CA 95203

Subject: Fuel Leak Case No. RO0000357, Snow Cleaners, 2678 Coolidge Avenue, Oakland, CA I

Dear Mr. Turner:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the report entitled, "Subsurface Investigation Report (B3 through B7)," dated February 28, 2005. The report was prepared by P & D Environmental on behalf of Snow Cleaners. The report indicates that petroleum hydrocarbons have been detected at elevated concentrations in groundwater at your site. In addition, cis-1,2-dichloroethene, a degradation product of perchloroethene and trichloroethene has been detected in groundwater samples from the site. The lateral and vertical extent of soil and groundwater contamination at the site has not been fully defined. Therefore, additional investigation is required.

The above referenced report includes recommendations for additional investigation. In general, ACEH concurs with the recommendations and proposed locations for additional investigation presented in the above referenced report. ACEH requests that a Work Plan that fully describes the proposed boring methods and depths, sampling methods, analytical methods, and criteria for selecting soil and groundwater sampling intervals be submitted. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Soil Samples within Planters and Landscaped Areas.** Excavated soil from the tank pit was placed in planters and landscaped areas at the site following tank removal. Collection of soil samples from seven planters and landscaped areas was previously proposed in a work plan entitled, "Subsurface Investigation Work Plan," dated January 20, 2003. No sampling results from these proposed locations are included in the report entitled, "Subsurface Investigation Report (B3 through B7)," dated February 28, 2005. Therefore, please include these sampling results or plans to collect these soil samples in the Work Plan requested blow.
2. **Conduit Study.** We request that you perform a conduit study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site. The purpose of the conduit study is to locate and determine the probability of the dissolved plume encountering preferential pathways and conduits that could spread contamination. Of particular concern is the identification of abandoned wells and improperly destroyed wells that can act as vertical conduits to deeper water bearing zones in the vicinity of your site. Discuss your analysis and

interpretation of the results of the conduit study and report your results in the Soil and Groundwater Investigation Report requested below. An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area is required as part of your study. Your conduit study needs to contain all information required by 23 CCR 2654(b). Any sensitive receptors in the vicinity of the site are to be identified and their locations plotted on a map of the site vicinity.

- 3. GeoTracker EDF Submittals.** A review of the case file and the State Water Resources Control Board's (SWRCB) GeoTracker website indicate that electronic copies of analytical data have not been submitted for your site. Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude to sub-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB GeoTracker system via the internet. In order to remain in regulatory compliance, please upload all analytical data (collected on or after September 1, 2001), to the SWRCB's GeoTracker database website in accordance with the above-cited regulation. **Please perform the electronic submittals for applicable data and submit verification to this Agency by August 31, 2005.**

TECHNICAL REPORT REQUEST

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

- **September 12, 2005 – Work Plan for Soil and Groundwater Investigation**
- **120 days after ACEH approval of Work Plan – Subsurface Investigation Report**

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

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND


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

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

cc: Paul King
P & D Environmental
4020 Panama Court
Oakland, CA 94611

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



02-28-03

RO0000357

February 27, 2003

Mr. Harold Turner
38 Sonora St. W
Stockton, CA 95203

Dear Mr. Turner:

Re: Fuel Leak Site located at 2678 Coolidge Ave., Oakland 94601

I have received and reviewed "Subsurface Investigation Workplan", dated January 30th, 2003 along with other amendments concerning this workplan, prepared by Mr. Paul King of P&D Environmental regarding the above referenced site. Per my discussion with Mr. King Alameda County Environmental Health concurs with the proposed workplan. Additionally please ensure that all other directives indicated by Barney Chan of our office are also implemented and or submitted to this office. This includes groundwater monitoring, tabulation of dates and amounts of free product removal etc. as specified in a letter dated August 1st, 2001 as well as other previous communications from this office.

Please ensure that you comply by implementing this workplan in order to avoid non-compliance with the clean up fund office. Please be advised that a copy of this letter is being sent to the Cleanup Fund for their notification.

Should you have any questions and or concerns, please do not hesitate to call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. R. Joslin, Joslin Geotechnical, 924 Stockton St., P.O. Box 193, Dutch Flat, CA 95714

Mr. Paul King, P&D Environmental, 4020 Panama Court, Oakland, CA 94611

Ms. S. Knieriem, SWRCB UST Cleanup Fund, 1001 I St., Sacramento, CA 95814

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



8-2-02

August 1, 2002

Mr. Harold Turner
38 Sonora St. W
Stockton, CA 95203

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

Dear Mr. Turner:

Subject: Fuel Leak Site RO0000357, 2678 Coolidge Ave., Oakland 94601

Alameda County Environmental Health, Local Oversight Program (LOP), has recently reviewed the case file for the subject site and determined that additional information is needed at your site to progress toward case closure. We have also received a copy of a State Water Resources Control Board (SWRCB) letter from the UST Cleanup Fund placing your application on the Priority Class "B". In your review of this letter, please pay attention to the section, Compliance with Corrective Action Requirements. Note this section states that you must have complied with corrective action requirements... A compliance review by the Cleanup Fund staff will be done prior to issuing a Letter of Commitment. You should be aware that **our office does not consider your site in compliance**. Such a condition will jeopardize your eligibility to the Cleanup Fund. Our office requires that you address the technical comments below to maintain compliance.

Technical Comments

- My November 17, 2000 letter requested groundwater monitoring, tabulation of dates and amounts of free product removal, copies of cost estimates for the proposed geoprobe investigation and status of your Clean-up application.

To date, our office has not received any reports or contact from you or your consultant. You should contact our office immediately to inform us how you intend to comply with the items in my November 17, 2000 letter. A copy of this letter is being sent to the Cleanup Fund for their notification.

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. R. Joslin, Joslin Geotechnical, 924 Stockton St., P.O. Box 193, Dutch Flat, CA 95714
Ms. S. Knieriem, SWRCB UST Cleanup Fund, 1001 I St., Sacramento, CA 95814

2678Coolidge update

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Ro 357

September 7, 1999
StID # 72

Mr. Harold Snow
Snow Cleaners
38 West Sonora St.
Stockton, CA 95203

ENVIRONMENTAL HEALTH SERVICES

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

**Re: Preliminary Work Plan for Subsurface Investigation at Snow Cleaners
2678 Coolidge Ave., Oakland CA 94601**

Dear Mr. Snow:

Our office has received and reviewed the fax copy of the above referenced work plan as prepared by your consultant, Mr. Bob Joslin. This work plan responds to my July 23, 1999 letter. Our office response to this work plan is as follows:

- Your consultant inquired about suggesting another driller to provide a cost estimate for this work. Our office does not make recommendations, however, I suggest selecting from the list of drillers in the telephone yellow pages.
- The groundwater wells are tentatively scheduled for sampling during the week of September 20-23, 1999. Please notify our office **within 2 working days of this activity**. The water samples should be analyzed for TPH as motor oil, TPH as stoddard solvent, BTEX and chlorinated solvents. If free product is encountered, the well should be bailed as much as possible to remove the product.
- Our office requested the address of the site in Contra Costa where excavated soils were disposed. In addition, you were to verify that the property owner was notified of the soils origin and potential residual contamination. This information is required as this was done **without County approval and your site cannot be closed without this information**.
- The locations of the proposed borings are acceptable. However, you may not need to advance all borings if the extent of contamination is determined prior to advancing the outermost samples. In addition, you may relocate the boring on the south side of Davis St., if necessary, since your consultant anticipates difficulty in obtaining City approval for this location.

You may consider this letter conditional approval to proceed with the groundwater sampling and borings. 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. R. Joslin, Joslin Geotechnical, 924 Stockton St., P.O. Box 193 Dutch Flat, CA 95714
Wpap2678Coolidge

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0357

ENVIRONMENTAL HEALTH SERVICES

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

July 23, 1999

StID # 72

Mr. Harold Snow
Snow Cleaners
38 West Sonora St.
Stockton, CA 95203

**Re: Request for Work Plan for Subsurface Investigation at Snow Cleaners
2678 Coolidge Ave., Oakland CA 94601**

Dear Mr. Snow:

This letter follows-up on the site meeting and discussion we had on March 22, 1999. Mr. Robert Joslin, Mr. Mike Chambers were present along with us. We discussed the January 27, 1999 letter from Mr. Joslin and what could be done to further investigate the release from the former stoddard solvent tanks at your site.

At a minimum, any free product from monitoring well MW2 was to be bailed. This could be done on a fairly regular frequency depending on the amount of free product present in the well. This solvent/water mixture could then be treated in the distillation unit at the site, since this material is similar to that generated in your cleaning process. Our office's main concern is the proper training of any person(s) who would be sampling the well and the verification that your present equipment is capable of treating this material. My suggestion is to have an experienced sampler, such as Mr. Joslin, properly train any persons who might handle and distill this material. Please contact the equipment supplier to determine if there are any limitations to the material, which will be distilled. Please retain a record of the training of each employee who might handle and treat the bailed liquid. A record of the amount of liquid/free product removed from this well should be included in your groundwater monitoring report. Naturally, if free product is not present in this well, it should be sampled along with MW1.

MW1, should be sampled and tested on a semi-annual basis. As previously stated, the groundwater sample should be analyzed for TPH as motor oil, TPH as stoddard solvent, BTEX and chlorinated solvents (EPA Method 8240).

In regards to the disposition of soils generated from the tank removals, I understand that the amount of cubic yards of soil is not the 190 cubic yards previously believed. Of the 90 cubic yards reportedly generated, you stated 60 yards was taken to a site in Contra Costa and 30 was reused onsite, in the planter in front of your building. Please identify the location of this Contra Costa site and verify that the owner of this site has been informed of the origin of this material. If the results of the reported aerated sample represents that which was reused onsite, no further characterization of this material is necessary.

Mr. Harold Turner
2678 Coolidge Ave., Oakland 94601
StID #72
July 23, 1999
Page 2.

We also discussed additional site characterization could be done to determine the extent of soil and groundwater contamination. Mr. Joslin proposed approximately four temporary "geoprobe" borings, two on the south side of Davis St., one each in the driveways on Davis St. and Coolidge Ave. Soil and groundwater samples would be collected from these borings. This is a reasonable approach.

Please provide the following to our office within 45 days or by September 7, 1999:

- A groundwater monitoring report for the existing two wells
- Documentation of training and removal of any product from MW2
- Address of the Contra Costa site where soils were disposed and name and address of the property owner
- Work plan for the advancement of geoprobes at this site.

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. R. Joslin, Joslin Geotechnical, 924 Stockton St., P.O. Box 193 Dutch Flat, CA 95714
Mr. M. Chambers, P.O. Box 524, Alta, CA 95701

Reps2678Coolidge

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO # 357

February 5, 1999
StID #72

→ Mr. Harold Turner
Snow Cleaners
38 West Sonora St.
Stockton CA 95203

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

**Re: Comment on Joslin Geotechnical February 1, 1999 Work Plan for 2678 Coolidge Ave.,
Oakland CA 94601**

Dear Mr. Turner:

Our office has received and reviewed the referenced report/work plan prepared by Joslin Geotechnical, authored by Mr. Robert Joslin. As you are aware, he has proposed rather unorthodox remediation where your employees would routinely collect contaminated groundwater from monitoring well 2, distill this liquid to collect the free product and perform the demolition of Building 2 during the summer. Joslin Geotechnical would continue to sample and monitor the wells on a quarterly schedule. After this demolition, additional soil sampling and the installation of a third monitoring well could be done. Before I comment on this request, I'd like to clarify my prior requests and respond to your consultant's inquiry about the Cleanup Fund.

- In my December 10, 1998 letter, I requested information regarding the testing and disposal of the soil generated from the tank removals. An earlier report estimated the amount of this soil to be approximately 190 cubic yards. Joslin's November 30, 1998 cumulative report states that one sample was taken of the contaminated soil (approximately 25 yards), tested and then the soil was released to local contractors in spring/summer of 1991. Obviously, this was not done under the County's oversight or approval. Nevertheless, we need the following information, at a minimum: amount of soil reused on-site, amount of soil used by contractors, location(s) of the reused soil by local contractor and the method used to separate "clean" and "contaminated" soil. You should account for approximately 190 cubic yards of soil.
- Please insure that future groundwater monitoring reports include the additional information requested in my December 10, 1998 letter; ie a site map, sampling information (pH, temperature, conductivity, depth to water, purge volume and qualitative observations) and a estimate of the total amount of free product collected from the wells. Your site map should also indicate the location of Building 2 and the underground piping referenced in the January 28, 1999 letter. Are there any other potential sources of stoddard solvent contamination? All future monitoring events should analyze the water samples for total petroleum hydrocarbons as motor oil and as stoddard solvent, benzene, toluene, ethyl benzene and xylenes (BTEX) and chlorinated solvents (either EPA Method 8240 or 8010). Please insure that your monitoring reports are sent to our office within 45 days of the sampling date.
- My December 10, 1998 letter recommended that additional site characterization should be done using temporary borings eg Geoprobe, hydropunch. Therefore, we do not recommend the installation of a third monitoring well at this time.

Mr. Harold Turner
2678 Coolidge Ave., Oakland 94601
StID #72
February 5, 1999
Page 2.

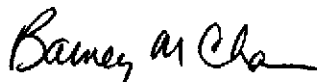
- Your site is eligible for the Underground Storage Tank Cleanup Fund. I am not certain about the amount of expenses eligible for reimbursement, however. You will need to have records of all past expenses. Please contact the Fund at (916) 227-4307 or 1-800-813-3863. If your site is eligible, you may be able to have future work plans "pre-approved" by the Fund to insure reimbursement.

I would now like to respond to the requests made in the Joslin Geotechnical work plan. In order to reduce spending and utilize existing manpower at this site, Joslin proposes to have current employees begin recovering free product by bailing, recycle the collected water and product and demolish the cleaning room. Please be aware that in order for Mr. Turner's employees to perform this work, they must be properly trained in the handling and treatment of hazardous waste. To verify this, they must provide our office proof of training in the form of a current certification or another form of certification if internally trained. If there will be no exposure to hazardous materials, these requirements are not required. It appears that free product may be diminishing and therefore, the effectiveness of bailing may be limited. You may want to consider the installation of oxygen releasing "socks" to the well as alternative passive remediation approach. It also appears that the installation of temporary borings may be possible without the demolition of Building 2. Please comment on this on your response to this letter.

Please provide your response to this letter and an amended proposal within 30 days or by March 9, 1999.

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. R. Joslin, Joslin Geotechnical, 924 Stockton St., P.O. Box 193, Dutch Flat, CA 95714
Mr. M. Chambers, P.O. Box 524, Alta, CA 95701

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20357

December 10, 1998
StID # 72

Mr. Harold Turner
Snow Cleaners
38 West Sonora St.,
Stockton, CA 95203

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

Re: Underground Tank Investigation at 2678 Coolidge Ave., Oakland CA 94601

Dear Mr. Turner:

Thank you for the submission of the groundwater monitoring reports for the above site as provided in the combined report from Joslin Geotechnical. This submission was in response to my October 21, 1998 Notice of Violation. Please be aware that the monitoring reports should be submitted on a quarterly basis (every three months). Typically, these reports are completed within 60 days of the actual monitoring date. Since our office has not received any groundwater monitoring reports beyond the initial sampling after the installation of the wells, we assumed no additional work had occurred. Because of our lack of information, you were lacking the County's review, comments and recommendations for the site, which will undoubtedly prolong this investigation.

I would like to comment on the bulleted items in my October 21, 1998 letter, comment on the monitoring reports and provide recommendations for site characterization.

My first bulleted item requested documentation for the approximate 190 cubic yards of excavated soils generated from the tank removals. You were requested to provide copies of the results of the treated soil and the amount soil taken to each location. The information provided stated that only one sample was analyzed to characterize the treated soil, which was released in the spring/summer of 1991 to local contractors. It appears that the soils from above the tanks were not analyzed. Please clarify this information.

In regards to the monitoring reports, the reports state that they were sent to the County's office and the office of the Regional Water Quality Control Board (RWQCB). The County never received these reports. Upon review, the reports are missing the following information; a site map, sampling information including groundwater pH, temperature, conductivity, depth to water, purge volume and any qualitative observations. Please include this information in future monitoring reports. Each monitoring report states that the Total Petroleum Hydrocarbon (TPH) found is diesel when it is most likely stoddard solvent. It is important that the contaminant be properly identified so the health risk for this contaminant can be properly evaluated.

A number of recommendations have been made to characterize the site. Originally, an additional monitoring well and a soil vapor study were proposed. Our office agreed with this approach and requested a work plan for each of these proposals. At this time, I recommend reconsidering this approach. Groundwater appears to be encountered in a shallow perched lens and also in deeper

Mr. Harold Turner
2678 Coolidge Ave., Oakland CA 94601
StID # 72
December 10, 1998
Page 2.

depth at this site. Therefore, at least two additional wells would be necessary to determine groundwater gradient in the same water-bearing zone. A soil vapor survey would only be able to investigate the extent of soil contamination, while, our office requires the characterization of both soil and groundwater.

It appears that monitoring well MW2 has continually exhibited very high levels of petroleum hydrocarbon. This may have been exacerbated by the addition of contamination from vandels after this well's installation. Some type of active remediation is necessary for this well to remove the residual source of petroleum. The removal of free product from this well has been mentioned in a number of the reports. Please describe the method for free product removal and an estimated amount of free product to date which has been removed from this well.

Our office recommends that an additional subsurface investigation be performed using temporary borings. The number and location of these borings should encompass all potential groundwater flow directions. Soil and grab groundwater samples should be collected for chemical analysis. Based on the results of this investigation, the need for additional monitoring wells can be evaluated. Remediation of MW-2 could include free product, groundwater and/or soil vapor extraction. A mobile treatment unit might be considered. After free product has been removed from MW-2 the bio-attenuation indicator parameters should be analyzed in the wells to estimate the likelihood that natural bio-degradation is occurring.

Please provide your written response to this letter including an appropriate work plan within 45 days or by January 25, 1999.

Please feel free to have your consultant or yourself contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. R. Joslin, Joslin Geotechnical, 924 Stockton St., P.O. Box 193, Dutch Flat, CA 95714
Mr. M. Chambers, P.O. Box 524, Alta, CA 95701



October 21, 1998
StID #72

Mr. Harold Turner
Snow Cleaners
38 West Sonora St.
Stockton, CA 95203

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

NOTICE OF VIOLATION

Re: Underground Tank Investigation at 2678 Coolidge Ave., Oakland CA 94601

Dear Mr. Turner:

It is quite apparent to our office that little to no activity has occurred subsequent to the removal of the six underground tanks in 1990 and the installation of two monitoring wells in January of 1994 at the above referenced site. Our office last wrote you in my June 10, 1994 letter. This letter requested that quarterly groundwater monitoring be started. It further concurred with your then consultant, Joslin Geotechnical, recommendation to conduct a soil vapor survey at the site to determine the extent of soil contamination. A specific work plan and sample location map was requested.

To date, no information has been provided our office. In an attempt to "close" your site as possibly a "low risk" soil and/or groundwater site, we again request additional information and investigation.

You may be aware that the regulatory policy has relaxed somewhat from the time the underground tanks were originally removed. The Water Board has recommended that our office adopt the guidelines of the 1995 Lawrence Livermore National Laboratory (LLNL) study. This study recognized that typically petroleum releases from underground tanks do not tend to migrate far from their origin and once the source is removed, the release tends to stabilize and shrink due to natural bio-remediation. Hopefully, in the absence of any activity the past 4+ years, natural bio-remediation has consumed some of the petroleum contamination. Further direction from the State Water Resources Control Board (SWRCB) has instructed our office to "close" the low risk sites. The Regional Water Quality Control Board (RWQCB) has given our office their conditions for a "low risk" case.

To complete your investigation, you are requested to perform the following:

- Document the disposal of the excavated soils from the tank removal. It has been stated that approximately 190 cubic yards of excavated soils was moved to 2714 100th St. in Oakland. The soils were bio-remediated, tested and shown to be clean and then given to contractors to be used as "clean" soil. Please verify this by providing copies of the results of soil testing after treatment and the amount of soil taken and the names of the contractors who took the soil.

Mr. Harold Turner
StID # 72
2687 Coolidge Ave., Oakland
October 21, 1998
Page 2.

- Our office initially agreed that it was not reasonable to install an additional monitoring well, either on or off-site. On-site there was access problems due to low overhanging roofing and off-site, City permitting was anticipated to be difficult. Our office was informed in 1994 that the building was scheduled for demolition. After demolition, site access would be available for the additional well. At a recent site visit the existing buildings still remained but the rear building was not in use. You are requested to install a minimum of one additional monitoring well to estimate site-specific gradient. Our office will help in obtaining street access if requested. Actual monitoring well installation may be done after you inspect and sample the two existing monitoring wells.
- Monitoring wells B-1 and B-2 should be sampled for the following parameters; Total Petroleum Hydrocarbons as diesel, and as stoddard solvent, BTEX (benzene, toluene, ethyl benzene and xylenes) and volatile organics (EPA Method 8240). Volatile organics is requested due to the potential historical use of other organics at the site. Groundwater monitoring should continue on a quarterly basis until a stabile or declining trend in groundwater concentration is demonstrated.
- Previously, Mr. Joslin of Joslin Geotechnical proposed to use a soil vapor probe study to determine the limits of soil contamination. Our office agreed with this approach. Please provide a work plan for such a study. You should note that adequate site characterization is a requirement for a "low risk" site.

In our records are results of additional soil borings performed near the former underground tanks and around the rest of the site. Very little description of how these samples were taken was provided. Therefore, our office cannot comment on the environmental status of the rest of the site until a complete report of this additional investigation is provided for our review.

Our office encourages you to apply to the Underground Storage Tank Cleanup Fund (Cleanup Fund) which may be able to reimburse portions of prior and the majority of future expenses for the investigation or remediation of your site. You may contact the Fund at 1-800-813-3863 and your consultant should be able to help you complete the necessary paperwork.

Please provide a written comment to the above items **within 30 days or by November 23, 1998**. You may have your consultant contact me for any specific questions or requirements. I may be reached at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. R. Joslin, Joslin Geotechnical, 924 Stockton St., P.O. Box 193, Dutch Flat CA 95714

NOV-Snow

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0357

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

June 10, 1994
StID # 72

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. Harold Turner
Snow Cleaners
2687 Coolidge Ave.
Oakland CA 94601

**Re: Comment on May 20, 1994 Joslin Geotechnical Report for
Snow Cleaners, 2678 Coolidge Ave., Oakland 94601**

Dear Mr. Turner:

Our office has recently received and reviewed the above report as prepared by your consultant, Joslin Geotechnical. This report details the installation of two monitoring wells and their soil and groundwater sampling. As stated in this report, the physical constraints of the existing buildings prevented the installation of a third on-site well, therefore site specific gradient is not available. The report also describes the difficulty in obtaining access to nearby sites perform additional drilling and monitoring well installation. I have discussed these issues during and after this investigation with Mr. Joslin. Upon review of this report, our office has the following questions/concerns:

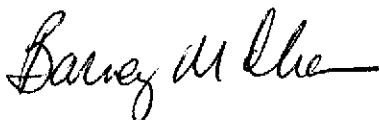
1. Please initiate quarterly groundwater monitoring with elevation, sampling and analysis for Total Petroleum Hydrocarbons as diesel, as stoddard solvent and BTEX (benzene, toluene, ethylbenzene, xylenes). Because of the unknown contents of the four additional tanks, please run your next groundwater sample in MW-2 for volatile organics via Method 624. If no compounds other than BTEX are identified, you may discontinue this analysis in future monitoring events. In addition, please provide copies of the gas chromatograms for the TPH analysis of MW-2. This means that another monitoring event should have occurred in May 94. Your monitoring report should be submitted to our office within 45 days of each monitoring event.
2. Please verify the depths at which the following soil samples were taken: B-2;212 through B-2;253.
3. Our office has no objections with the proposed vapor probe study. Please have your consultant provide any specific literature available from the referred to Richards Corporation. We would also like a map showing the proposed locations of the soil vapor probe borings. Are the proposed locations starting nearest to the former tank pit and extending radially outward?

Mr. Harold Turner
StID # 72
2687 Coolidge Ave.
June 10, 1994
Page 2.

Please respond to the above items either separately or along with your next quarterly monitoring report.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: R. Joslin, Joslin Geotechnical, 924 Stockton St., P. O. Box
193, Dutch Flat, CA 95714
E. Howell, file

2-Snow

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0357

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

April 22, 1994
StID # 72

Mr. Harold Turner
Snow Cleaners
2687 Coolidge Ave.
Oakland CA 94601

**Re: Request for Technical Report for the Installation of
Monitoring Wells at 2687 Coolidge Ave., Oakland 94601**

2678

Dear Mr. Turner:

Our office is aware that in January of 1994 Mr. Robert Joslin of Joslin Geotechnical installed two monitoring wells at the above site. During the installation of these wells, I was contacted by Mr. Joslin and informed of the specifics of what was being encountered during the drilling. I was also notified that I was to expect a report detailing this work and within this report a recommendation as to your next step of investigation. As of this date, our office has not received these reports.

Please submit the requested technical documents **within 30 days or by May 25, 1994**. This is a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the requested report may subject you to civil liabilities.

In addition, be aware that Section 2652 (c) (11d) of Title 23, the California Code of Regulations requires that until the investigation and cleanup are complete, the owner or operator shall submit reports to the local agency or regional board every three months or at more frequent intervals as specified by the implementing agency. This includes quarterly monitoring reports.

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: R. Joslin, Joslin Geotechnical, 924 Stockton St., P.O. Box
193, Dutch Flat, CA 95714
E. Howell, file rep2687

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0357

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

September 21, 1993
StID # 72

Mr. Harold Turner
Snow Cleaners
2687 Coolidge Ave.
Oakland CA 94601

**Re: Work Plan for the Installation of Monitoring Wells at
2678 ~~2687~~ Coolidge Ave., Oakland CA 94601**

Dear Mr. Turner:

Our office has received the September 19, 1993 letter from Mr. Robert Joslin of Joslin Geotechnical. This letter explains the proposed construction design for the monitoring wells and offers a compromise regarding the determination of the extent of soil contamination emanating from the former underground tanks. Mr. Joslin proposes to delay the installation of additional borings around the tank pit if the borings from the groundwater monitoring wells do not detect petroleum contaminants attributable to the dry cleaning operation. Keep in mind that additional borings or investigation will be required at a later time regardless of the results of the borings from the monitoring well. In addition, our office feels that since the former contents of the underground tanks has never been established, all parameters previously detected must be attributable to the "dry cleaning operation".

Our office approves of the stepwise approach of installing borings after the monitoring wells. Our assumption that combining borings and monitoring well installation would be a cost savings is apparently incorrect. You should proceed with monitoring well installation as soon as possible. Please contact me 48 hours prior to installation.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: R. Joslin, Joslin Geotechnical, 924 Stockton St., P.O. Box
193, Dutch Flat, CA 95714
E. Howell, file

2wp2687

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

RO 357

August 17, 1993
StID # 72

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. Harold Turner
Snow Cleaners
2687 Coolidge Ave.
Oakland CA 94601

Re: Comment on July 30, 1993 Work Plan for Subsurface
Investigation at 2687 Coolidge Ave., Oakland CA 94601,
Snow Cleaners

Dear Mr. Turner:

Our office has received and reviewed the above referenced work plan for the installation of three monitoring wells at the above site. It was prepared by Mr. Robert Joslin of Joslin Geotechnical. In general, our office approves of this work plan and you should proceed immediately after contacting me 48 working hours in advance. Our office does have the following concerns which should be addressed prior to performance of the proposed work:

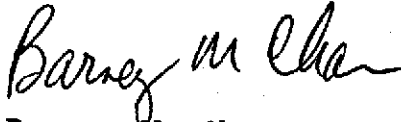
1. It should be noted that the typical well construction, which was to be shown in the appendix of the work plan, was somehow left out. Please also note that generally our office encourages well screening five feet above and ten feet into the first encountered water-bearing zone. Development of the monitoring wells should be no sooner than 72 hours after installation. The parameters: pH, temperature and conductivity should be monitored to insure stabilization prior to water sampling.
2. In addition to TPHg and BTEX, you should run the soil and groundwater samples for TPHd and TPHmo (or an equivalent). Recall, these contaminants were reported in the initial soil samples.
3. Our office feels that the extent of soil contamination will not be adequately defined with the well installations. Because of the likely residual soil contamination, additional soil borings should be proposed to determine the lateral extent of contamination in the north, south and east directions. Please provide a map indicating the locations of the additional borings.

Mr. Harold Turner
StID # 72
2687 Coolidge Ave.
August 17, 1993
Page 2.

Please provide a written response to the above concerns within 30 days, or by September 18, 1993.

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
R. Joslin, Joslin Geotechnical, 924 Stockton St., P.O. Box
193, Dutch Flat, CA 95714
E. Howell, files

3-wp2687

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0357

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

July 6, 1993
StID # 72

Mr. Harold Turner
Snow Cleaners
2687 Coolidge Ave.
Oakland CA 94601

**Re: Comment on June 24, 1993 Work Plan for Subsurface
Investigation at 2687 Coolidge Ave, Oakland CA 94601,
Snow Cleaners 0678**

Dear Mr. Turner:

Thank you for the submission of the above referenced work plan as provided by your consultant, Mr. Robert Joslin, of Joslin Geotechnical. Recall, this work plan proposes the installation of one monitoring well on the north side of the former tank field. I would like to comment on the items mentioned in this work plan as they address the issues in my November 3, 1992 letter.

1. Thank you for the submission of copies of the receipts for the disposal of waste from these tanks.
2. Please be aware that prior to releasing the remediated stockpile soils to local contractors, you must have verified remediation to non-detectable concentrations of all previously detected compounds in a sampling frequency approved by our office. I understand you have requested documentation from McCampbell Analytical. Please provide evidence of proper sampling and analysis of all soils given to contractors as "clean fill".
3. Point three of my November letter commented on the location of the three monitoring wells proposed in Mr. Joslin's August 1990 Tank Closure Report prepared for C. M. Chambers and Associates. Our office will require a minimum of three monitoring wells to determine the site specific gradient. The location of two of the wells could be within the curb area of Davis St. while the third well should be located within a vacant area within the property to triangulate the gradient. The lateral extent of soil contamination must also be determined with additional borings or other survey methods. Of course, the two wells on the curb area may be used to determine the extent of soil contamination in the southerly direction. Though groundwater depth may be known within the general area of this site, depth to water must be verified by at least one boring on-site.

Mr. Harold Turner
StID # 72
2687 Coolidge Ave.
July 6, 1993
Page 2.

Our office acknowledges the difficulty in obtaining offsite permission from the City of Oakland for drilling, however, it appears that there would be insufficient information to render any opinion on this site if this is not done. It should be noted that you were made aware of your remediation requirements in my July 16, 1990 letter nearly three years ago. If our office can help in any way to facilitate the permitting of the installation of offsite wells, please let me know.

As stated in Appendix A, August 20, 1991 supplement to the Tri-Regional Board Guidelines, please include in your next work plan submission a statement of the qualifications of the registered professional responsible for the project.

Please provide a work plan addendum to address the above items to our office **within 30 days or by August 6, 1993**. You should consider this a formal request for technical documents pursuant to the California Water Code Section 13267 (b). Failure to submit the requested documents may subject you to civil liabilities.

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. Joslin, Joslin Geotechnical, Box 193, Dutch Flat, CA 95714
E. Howell, files

2-wp2687

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0357

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 27, 1993
STID # 72

Mr. Harold Turner
Snow Cleaners
2687 Coolidge Ave.
Oakland CA 94601

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

NOTICE OF VIOLATION

Re: Request for Implementation of Subsurface Investigation at
Snow Cleaners at 2687 Coolidge Ave., Oakland CA 94601
2678

Dear Mr. Turner:

You were informed in my November 3, 1992 to provide a time schedule for the installation of monitoring wells and the further characterization of the above site. You were requested to respond within 30 days. To this date, our office has failed to receive any correspondence.

You were notified of your requirement for a workplan to assess the extent of soil and groundwater contamination at this site in my July 16, 1990 letter to you. Mr. Mike Chambers responded in an August 1990 report which detailed the activities of the tank removals and presented a plan for groundwater investigation. Our office is not aware that any of the proposed work has been performed. Please provide a schedule for the monitoring well installations along with responding to the following County concerns:

1. In order to complete your tank closure report, please provide copies of the manifest of any residual product or liquid waste generated from the tank removals. We are aware that some product was disposed by Recycletron Oil, Inc.
2. Please give the status of all stockpiled soils removed from this site. Apparently, this material was taken to your 2714 100th St. site for aeration. Final analytical results or weight tag receipts will be necessary to document the final disposition of this material.
3. The proposal for the installation of three monitoring wells is acceptable, however, their locations are in a straight line within the curb area of the property. This geometry will not enable you to determine the site specific gradient, therefore, an additional well within the property will be necessary to provide this information. Please provide a map showing the anticipated location of this monitoring well.

Mr. Harold Turner
Snow Cleaners
STID # 72
May 27, 1993
Page 2.

4. Please note that for all borings from the monitoring well installations you should analyze for the following contaminants: Total Petroleum Hydrocarbons as gasoline, as diesel, as motor oil and BTEX (Benzene, Toluene, Ethylbenzene and Xylenes).

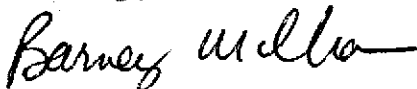
5. What assessment will be done to determine the lateral and vertical extent of the petroleum hydrocarbon contamination? This information will be required, even if no further excavation is feasible.

A time schedule for the installation of the monitoring wells and a written reply to the issues mentioned above should be provided to this office within 30 days or by June 28, 1993.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). All reports, workplans or analytical results 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 2102 Webster St. Suite 400, Oakland CA 94612. Failure to submit the requested documents may subject you to civil liabilities.

You may contact me at (510) 271-4350 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan
Hazardous Material Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiett, RWQCB
C. M. Chambers, C. M. Chambers and Associates, 1507 Tulip
Circle, Auburn, CA 95603
E. Howell, files

nov-2678Coolidge

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



R0357

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

November 3, 1992
STID # 72

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. Harold Turner
Snow Cleaners
2687 Coolidge Ave.
Oakland CA 94601

Re: Request for Implementation of Subsurface Investigation at
Snow Cleaners at 2687 Coolidge Ave., Oakland CA 94601
2678

Dear Mr. Snow:

The oversight of the remediation of the above site has been transferred to the Local Oversight Program (LOP) section of Alameda County Environmental Health Hazardous Materials Division. A "Notice of Requirement to Reimburse" letter was sent in July of 1992 informing you of this. Your contact from this office remains the same undersigned specialist.

You were first notified of your requirement for a workplan to assess the extent of soil and groundwater contamination at this site in my July 16, 1990 letter to you. Mr. Mike Chambers responded in an August 1990 report which detailed the activities of the tank removals and presented a plan for groundwater investigation. Our office is not aware if any of the proposed work has been performed. Assuming none of this work has been done, please provide a schedule for the monitoring well installations along with responding to the following issues raised through review of your files:

1. In order to complete your tank closure report, please provide copies of the manifest of any residual product or liquid waste generated from the tank removals. We are aware that some product was disposed by Recycletron Oil, Inc.
2. Please give the status of all stockpiled soils removed from this site. Apparently, this material was taken to your 2714 100th St. site for aeration. Final analytical results or weight tag receipts will be necessary to document the final disposition of this material.
3. The proposal for the installation of three monitoring wells is acceptable, however, their locations are in a straight line within the curb area of the property. This geometry will not enable you to determine the site specific gradient, therefore, an additional well within the property will be necessary to provide this information. Please provide a map showing the anticipated location of this additional monitoring well.

Mr. Harold Turner
Snow Cleaners
STID # 72
November 3, 1992
Page 2.

4. Please note that for all borings from the monitoring well installations you should analyze for the following contaminants: Total Petroleum Hydrocarbons as gasoline, as diesel, as motor oil and BTEX (Benzene, Toluene, Ethylbenzene and Xylenes).

5. What assessment will be done to determine the lateral and vertical extent of the petroleum hydrocarbon contamination? This information will be required even if no further excavation is proposed.


A time schedule for the installation of the monitoring wells and a written reply to the issues mentioned above should be provided to this office within 30 days of receipt of this letter.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). All reports, workplans or analytical results should be sent to our office and to that of the Regional Water Quality Control Board (RWQCB) to the attention of Mr. Rich Hiatt. Their address is 2102 Webster St. Suite 500, Oakland CA 94612. Failure to submit the requested documents may subject you to civil liabilities.

Be aware that Section 25299 (5) of the California Health and Safety Code allows up to \$5000 for each underground tank for each day which the operator or owner fails to properly close an underground tank.

You may contact me at (510) 271-4350 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan
Hazardous Material Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiatt, RWQCB
C. M. Chambers, C. M. Chambers and Associates, 1507 Tulip
Circle, Auburn, CA 95603
E. Howell, files

WP-2678Coolidge

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0357

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

July 16, 1990

Mr. Harold Turner
Snow Cleaners
2687 Coolidge Ave.
Oakland, CA 94601

Subject: Unauthorized Release from Underground Tank Removals,
26782687 Coolidge Ave.
Oakland, CA 94601

Dear Mr. Turner:

Alameda County Environmental Health, Hazardous Materials Division, has been informed of subsurface soil results from borings done by Mr. Charles M. Chambers on your behalf at the above address. Sample 5-90-1003-11-1 was reported to contain 856 ppm petroleum hydrocarbons identified as paint thinner. 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 potentially groundwater. 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 any possible 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.

Mr. Harold Turner
2678 Coolidge Ave.
Page 2

I. Introduction

- A. Statement of scope of work
- B. Site map showing location of existing and past underground storage tanks and associated piping
- 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
 - indicate depth to ground water
 - describe soil strata encountered
 - provide soil sampling results, chain of custody forms, identity of sampler
 - describe methods for storing and disposal of all soils

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
- C. Describe security measures

Mr. Harold Turner
2678 Coolidge Ave.
Page 3

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

C. 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

Mr. Harold Turner
2678 Coolidge Ave.
Page 4

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 Snow Cleaners or an authorized representative of you.
- 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

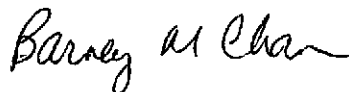
Mr. Harold Turner
2687 Coolidge Ave.
Page 5

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). Any extensions of agreed upon time deadlines must be confirmed in writing by either this Division or the RWQCB.

Should you have any questions concerning the contents of this letter or the status of this case please contact the undersigned at 271-4320.

Sincerely,



Barney M. Chan,
Hazardous Materials Specialist,

cc: Gil Jensen, Alameda County District Attorney, Consumer &
Environmental Protection
Lester Feldman, SFRWQCB
Howard Hatayama, DOHS
Mr. Charles M. Chambers, C.M. Chambers and Associates

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



R0357

Telephone Number: (415)

February 6, 1990

Mr. Harold Turner
Snow Cleaners
2678 Coolidge Ave.
Oakland, CA 94601

Dear Mr. Turner:

From a conversation with Mr. Mike Chambers on January 23, 1990, he indicated an intention of terminating the usage of 1000-gallon stoddard solvent tank and the removal of other four tanks currently in non-use within two to three weeks. Removal of all five tanks would then be scheduled for the summer of 1990. The County will agree to this proposal on the conditions that:

- 1) The enclosed "underground tank closure/modification plans" are filled out and submitted with a deposit of \$996.00, check made payable to Alameda County for the review and oversight of these removals;
- 2) A commitment in writing for the initiation of removal of these tanks within six months of notification of approval of the removal plan.

Should you decide not to proceed in this manner, please notify our agency, as a permanent permitting inspection will need to be done for your tanks.

Please contact Barney Chan, Hazardous Materials Specialist at 415/271-4320 if you have any questions.

Sincerely,

Ed B. Howell III
Acting Chief, HazMat Division

BC:mam

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



R0357

Telephone Number: (415)

January 29, 1990

Mr. Harold Turner
Snow Cleaners
2678 Coolidge Ave.
Alameda, CA 94501

Dear Mr. Turner:

From a conversation with Mr. Mike Chambers on January 23, 1990, he indicated an intention of terminating the usage of 1000-gallon stoddard solvent tank and the removal of other four tanks currently in non-use within two to three weeks. Removal of all five tanks would then be scheduled for the summer of 1990. The County will agree to this proposal on the conditions that:

- 1) The enclosed "underground tank closure/modification plans" are filled out and submitted with a deposit of \$996.00, check made payable to Alameda County for the review and oversight of these removals;
- 2) A commitment in writing for the initiation of removal of these tanks within six months of notification of approval of the removal plan.

Should you decide not to proceed in this manner, please notify our agency, as a permanent permitting inspection will need to be done for your tanks.

Please contact Barney Chan, Hazardous Materials Specialist at 415/271-4320 if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ed B. Howell III".

Ed B. Howell III
Acting Chief, HazMat Division

BC:mam