

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
02-03-06

February 2, 2006

Mr. Wayne Chun and Ms. Lily Chun
740 Canterbury Ave.
Livermore, CA 94550

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

Dear Mr. and Ms. Chun:

Subject: Fuel Leak Case RO0000382, 2301 Santa Clara Ave., Alameda,
CA 94501

Alameda County Environmental Health (ACEH) has reviewed the case file and status of the subject site and determined that your site is out of compliance. Though site investigation has been performed actual on-site remediation has not. According to the March 25, 2005 Preliminary Project Schedule prepared by Loftin and Associates, a groundwater pump and treat remediation system was to have been in operation by the week of June 13, 2005 and a portable vapor extraction system was to have been tested by the week of July 11, 2005. These activities have not occurred. As such, this letter serves to inform the SWRCB Cleanup Fund that your site is out of compliance and that they should takes steps to remove your eligibility to the Fund. In addition, the Alameda County District Attorney's Office is also notified of this site's history of non-compliance and our agency's recommendation to the SWRCB. The District Attorney's office shall consult with this office to determine whether local enforcement action is appropriate.

UNDERGROUND STORAGE TANK CLEANUP FUND

Our office, by this letter, is informing the Fund that your site is not in compliance. This 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

Because significant delays are occurring, we have referred your case to 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) 567-6765.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: files, D. Drogos, A.Levi

Mr. F. Goldman, P.O. Box 59, Sonoma, CA 95476

Mr. M. Loftin, Loftin & Associates, 1990 Bradshire Drive, Mobile, AL 36695

Ms. S. Knieriem, SWRCB Cleanup Fund, 1001 I St., Sacramento, CA 94244-2120

Ms. S. Torrence, Alameda County DA Office

Ms. Leslie Little, Development Services Dept., 950 West Mall Square, Alameda,
CA, 94501

1_12_05 2301 Santa Clara

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Scw
11-29-05

November 23, 2005

Mr. Wayne Chun and Ms. Lily Chun
740 Canterbury Ave.
Livermore, CA 94550

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

Dear Mr. and Ms. Chun:

Subject: Fuel Leak Case RO0000382, 2301 Santa Clara Ave., Alameda, CA 94501

Alameda County Environmental staff has reviewed the case file for the subject site including the October 18, 2005 Workplan for Indoor Air and Soil Gas Sampling...@2301 Santa Clara Ave., Alameda, CA 94501 report by Mr. Frank Goldman. Based upon prior soil and groundwater results, potential exposure to soil vapors to off-site workers and residents, was requested by our office. This work plan responds to several County letters requesting a soil vapor evaluation/work plan. The work plan proposes several stages of on-site investigation and sampling. First the flower shop and greenhouse down-gradient of the site will be screened and soil vapor sampled. Next, specific locations outside these buildings will be sampled from semi-permanent vapor wells and analyzed by an on-site mobile laboratory. The investigation is consistent with that described in the DTSC document, "Interim Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air," December 15, 2004 (Revised February 7, 2005). A human health risk assessment will be performed using the data obtained in this investigation. We approve this work plan. We request that you send us the technical report requested below.

TECHNICAL REPORT REQUEST

Please submit the technical report to Alameda County Environmental Health according to the following schedule:

- 90 days after completion of Soil Vapor Sampling- Soil Vapor Investigation Report and Human Health Risk Assessment

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. Submission of electronic documents to the Alameda County 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. Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic%20reporting)).

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.

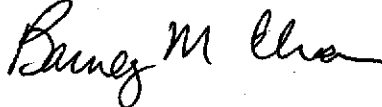
AGENCY OVERSIGHT

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.

Mr. and Ms. Chun
2301 Santa Clara Ave., Alameda, CA
Page 3 of 3

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: files, D. Drogos

Mr. F. Goldman, P.O. Box 59, Sonoma, CA 95476

Mr. M. Loftin, Loftin & Associates, 1990 Bradshire Drive, Mobile, AL 36695

Ms. S. Knieriem, SWRCB Cleanup Fund, 1001 I St., Sacramento, CA 94244-2120

Ms. S. Torrence, Alameda County DA Office

Ms. Leslie Little, Development Services Dept., 950 West Mall Square, Alameda,
CA 94501

11_23_05 2301 Santa Clara

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 12, 2005

Mr. Wayne Chun and Ms. Lily Chun
740 Canterbury Ave.
Livermore, CA 94550

Dear Mr. and Ms. Chun:

Subject: Fuel Leak Case RO0000382, 2301 Santa Clara Ave., Alameda, CA 94501

Alameda County Environmental staff has reviewed the case file for the subject site including the July 10, 2005 subsurface investigation report by Mr. Frank Goldman. The investigation was performed to determine the extent of soil and groundwater contamination emanating from the subject site. We concur with the report, that is, it appears that fuel contaminants have migrated off-site by either groundwater gradient flow and/or by preferential pathways. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. The installation of six boreholes and seven monitoring wells is consistent with your proposed work plan and the County's 4/19/05 work plan approval letter. It appears that wells installed were justified in order to determine the extent of the petroleum plume and their construction consistent with the hydropunch and boring log results.
2. The off-site wells should be included in the current semi-annual monitoring well program. It is important that a baseline monitoring event occur prior to initiating remediation to verify existing conditions and to clarify the groundwater flow regime, on and off-site. Please provide your monitoring report according to the schedule below. After remediation is started at the site, we request that you submit quarterly groundwater monitoring reports and include an update as to the progress and data achieved during the past quarter.
3. As previously requested, please provide a work plan for soil vapor sampling, now that the extent of the plume and the areas impacted have been determined. Please submit your work plan as requested below.
4. **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 website 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 accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker

website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). 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 September 13, 2005.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health according to the following schedule:

- September 13, 2005 – Groundwater Monitoring report and work plan for soil vapor sampling.

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. 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, 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

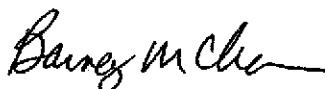
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos

Mr. F. Goldman, P.O. Box 59, Sonoma, CA 95476

Mr. M. Loftin, Loftin & Associates, 1990 Bradshire Drive, Mobile, AL 36695

Ms. S. Knieriem, SWRCB Cleanup Fund, 1001 I St., Sacramento, CA 94244-2120

Ms. S. Torrence, Alameda County DA Office

Ms. Leslie Little, Development Services Dept., 950 West Mall Square, Alameda, CA 94501

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



February 22, 2005

Mr. Wayne Chun and Ms. Lily Chun
740 Canterbury Ave.
Livermore, CA 94550

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

Dear Mr. and Ms. Chun:

Subject: Fuel Leak Case RO0000382, 2301 Santa Clara Ave., Alameda, CA 94501

Alameda County Environmental staff has reviewed the case file for the subject site and determined that additional information is needed at your site to progress toward case closure. We are concerned that you have failed to make significant steps towards initiating interim remediation at your site as requested in our March 24, 2004 letter. It was expected that you would have made progress with the installation and operation of the approved groundwater/soil vapor extraction system. In addition, your monitoring reports lack explanation for delays, nor have they provided a schedule for remediation, as requested.

TECHNICAL COMMENTS

Current Site Conditions

- Elevated TPHg and BTEX in groundwater is present both on and off-site. Up to 43,000 ppb TPHg, 8,000, 14,000, 2500, 10,600 ppb BTEX, respectively, was reported in EW-14 during the November 2004 monitoring event.

Plume Characterization

- The lateral and vertical extent of the TPH plume has not been defined and the release has migrated offsite and impacted groundwater beneath neighboring properties. Recent monitoring indicate a southerly gradient, however variable gradients to the north have also been observed in the past and the contamination detected in MW-11 can only be accounted for by an easterly gradient or a preferential pathway. Therefore, it appears that additional delineation is necessary. We request that you provide a summary of analytical data and a sampling map along with a work plan to perform additional offsite investigation. We request that you utilize depth discrete sampling techniques on borings installed along transect(s) to define and quantify the extent of dissolved contamination.

We request that you immediately pursue any off-site access agreements that you may need to complete your investigation activities in accordance with the schedule shown below. ACEH will send the access request letter (see Attachment 1) to owners of the neighboring properties where you propose to perform investigation activities. Please provide us with the name and address of the appropriate contacts for your off-site boring locations as requested below.

Indoor Air Sampling

- The impact to indoor air must be evaluated again given the continued migration of the unabated plume and its potential impact to neighboring properties and new standards for this evaluation. The past vapor sampling was done within the neighboring flower shop. We request that you review current soil vapor sampling methodology, the location of neighboring properties and receptors and determine if additional vapor sampling is warranted. Provide your comments and proposal as requested below.

Preferential Pathway Study

- Although sampling has been done previously adjacent to utilities and a production well has been referenced, we request that you provide a map showing the location and depth of all utility lines near the plume and a survey of all wells within a 2,000 foot radius of the site. Discuss your analysis and interpretation of the results of the preferential pathway study (including the well survey and utility survey) and report your results in the SWI Report requested below. Include an evaluation of the probability of the dissolved phase and NAPL plumes for all constituents of concern encountering preferential pathways and conduits that could spread the contamination. The results of your study shall contain all information required by 23 CCR, Section 2654(b).

Interim Cleanup

- ACEH has previously approved the interim cleanup of your site using soil vapor and groundwater extraction as described in the September 1, 2003 Remedial Action Plan Report prepared by Loftin & Associates. The specifics of the steps required for implementation are in this report. Since this time, our office has received only intermittent verbal reports on the status of the cleanup. From these reports, it appears that the delays have not been reasonable or justified. We request that you provide a written time schedule for all major steps of the remediation and provide updates and justification for delays in your groundwater monitoring reports.

Groundwater Monitoring

- We request that you continue to monitor the existing wells according to the June 2004 modified semi-annual schedule until further notice.

Agency Co-operation

- Our office has been notified of the concern expressed by the City of Alameda Development Services Department regarding the state of the site remediation. They will be seeking enforcement in their Municipal Code governing vacant parcels. Our office concurs that ample time has been given to you to remedy this site, especially with your eligibility for the UST Cleanup funds. We shall be working with the City of Alameda and are prepared to take enforcement steps as necessary to achieve our common goal.

TECHNICAL REPORT REQUEST

- **March 28, 2005-** Technical reports including data table, site map, work plan for plume delineation, indoor air evaluation, list off-site contacts and time schedule for remediation
- **April 18, 2005-** Preferential Pathway Study

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.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late 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.

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.

PERJURY STATEMENT AND PROFESSIONAL CERTIFICATION

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

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

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

Additionally, to be considered a valid technical report you are to present site specific data, data interpretations, and recommendations prepared by the 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.

If you have any questions, please contact me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Enclosure (F. Goldman only)

C: B. Chan, D. Drogos

Mr. F. Goldman, Environmental and Hydrogeological Consulting, P.O. Box 59, Sonoma,
CA 95476

Mr. M. Lofton, Loftin & Associates, 1990 Bradshaw Drive, Mobile, AL, 36695

Ms. S. Knieriem, SWRCB Cleanup Fund, 1001 I St., Sacramento, CA 94244-2120

Ms. S. Torrence, Alameda County DA Office

Ms. Leslie Little, City of Alameda, Development Services Dept., 950 West Mall Square,
Alameda, CA 94501

Date

Off-site Property Owner
Address

Subject: Property Access by the Parties Responsible for the Investigation and Cleanup of
Petroleum Hydrocarbon Case No. RO0000382, 2301 Santa Clara St., Alameda,
California, 94501

Dear Property Owner:

Alameda County Environmental Health (ACEH) is overseeing the investigation and cleanup of gasoline and gasoline components, BTEX, released from fuel underground storage tanks at the subject site. We are uncertain as to how far the contamination from those tanks has moved.

ACEH is requiring the property owner to investigate and clean up contaminated soil and groundwater at the site to prevent the gasoline and BTEX contamination from spreading to other properties or to drinking water sources, and to reduce the potential threat to human health and the environment. To properly determine the extent of that contamination in groundwater, the property owner must perform additional off-site investigation. Therefore, we need your help in allowing access to your property by the property owner to properly define the extent of contamination.

If you have any questions, please contact property owner at phone number. Thank you for your cooperation.

Sincerely,

Caseworker
Hazardous Materials Specialist

cc:

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
03-25-04

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

March 24, 2004

Mr. Wayne Chun and Ms. Lily Chun
740 Canterbury Ave.
Livermore, CA 94550

Dear Mr. and Ms. Chun:

Subject: Fuel Leak Case No. RO0000382, 2301 Santa Clara Ave., Alameda, CA 94501

Alameda County Environmental Health staff has received and reviewed the February 9, 2004 *Installation of Three Additional Groundwater Extraction Wells and One Exploratory Soil Boring...@2301 Santa Clara Avenue, Alameda, CA 94501* submitted by Mr. Frank Goldman. As you are aware, this report details two activities required to complete the soil vapor/groundwater extraction tests. The three wells were installed to complete the array of remediation wells and the exploratory boring was installed to confirm the thickness of the confined aquifer and locate the confining layer. Your consultant states that the presence of the confining layer confirms the estimate of the capture zone of the extraction wells ie the design of these wells is appropriate. Since this work has been completed, we request that you initiate remediation from the groundwater/soil vapor extraction wells immediately.

TECHNICAL COMMENTS

1. In response to your consultant's request to decommission well SV-1, it appears this recommendation is based upon the well inability to generate enough water to purge prior to sampling. Therefore, the quality of the sample is in question. Prior to approving closure of this well please review past sampling results to confirm this problem. Then, please attempt to redevelop this well during the next sampling event.
2. During the remediation process, you may have your consultant consider implementing a revised groundwater monitoring program. Since some of the extraction wells are located near (within the area of influence) of existing wells, some wells monitoring results may be similar if not duplicative of that from the extraction wells. Other wells, which have not detected petroleum contamination in the past, may be considered for less frequent sampling. Please have your consultant propose an alternative sampling plan. In addition, groundwater gradient will be significantly distorted during remediation and may not be meaningful. Quarterly monitoring reports shall also include a status report on the soil gas/groundwater remediation process.

TECHNICAL REPORT REQUEST

- July 26, 2004- Groundwater Monitoring Report with approved new monitoring program and remediation progress report.

Mr. Wayne Chun and Ms. Lily Chun
RO0000382, 2301 Santa Clara Ave., Alameda, CA 94501
March 24, 2004
Page 2 of 2

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, D. Drogos
Mr. F. Goldman, P.O. Box 725, Sebastopol, CA 95473
Ms. S. Knieriem, SWRCB Cleanup Fund, 1001 I St., Sacramento, CA 94244-2120
2301 SantaClara3_24_04

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

August 9, 2002 KEARS, Agency Director



08-06-02

Mr. Wayne Chun and Ms. Lily Chun
740 Canterbury Ave.
Livermore, CA 94550

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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Dear Mr. and Ms. Chun:

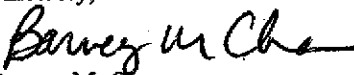
Subject: Fuel Leak Case No. RO0000382, 2301 Santa Clara Ave., Alameda, CA 94501

Alameda County Environmental Health, Local Oversight Program (LOP), has recently reviewed the case file for the referenced site including the August 5, 2002 fax copy of your July 2002 groundwater sampling report. We have determined that additional work is needed to maintain regulatory compliance, maintain Cleanup Fund eligibility and exclude the need of enforcement by the Alameda County District Attorney's Office. As you are aware, our office was recently contacted by the local newspaper, Alameda Journal. They chronicled your site's history in an August 2, 2002 news article. Our office informed the Journal of the status of requested technical documents and planned on-site work. Clearly, the cleanup of your site is a concern not only to the Health Department but to local businesses and neighbors as well. Our office has allowed you great flexibility in dealing with this site and the result is several years of inactivity. However, we must now set a stricter time schedule.

Please adhere to the following Technical Report Request :

- The groundwater monitoring report requested by April 16, 2002, was submitted by fax on August 5, 2002. Please submit your hard copy as soon as possible. All future reports should include a cumulative analytical data table, including calculated gradient. Please include a rose diagram of gradients in your next report. The next monitoring reports should be received by **November 5, 2002, February 5, 2003, May 5, 2003 and August 5, 2005**. The sampling dates should be approximately one month prior to the due date. After the last monitoring report date, the schedule may be reviewed.
- Though the August 2002 monitoring results report lower concentrations than the last October 2000 report, the time lapse between these two samplings provides a significant variable when comparing the results. Nevertheless, the reported concentrations still represent levels, which require remediation. Your prior work plan for Pumping and Vapor Extraction Tests was approved in our June 14, 2002 letter. Three new extraction wells were proposed in this work plan. The well installation report was requested by July 31, 2002. Your consultant states that a work plan for well installation will be sent to our office this week. Please be advised, the work plan will be approved and the installations should be scheduled immediately. **Please complete your well installations by September 6, 2002.**
- **Please complete your pumping and vapor extraction test by November 6, 2002 and submit your test report by December 6, 2002.** Any delays to the referenced dates should be confirmed with our office. Failure to submit the requested reports will cause the reference of your site to the District Attorney's Office for enforcement. 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. F. Goldman, P.O. Box 2217, Guerneville, CA 95446
Ms. S. Torrence, Alameda County District Attorney Office

Sched2301 SantaClaraAve

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



06-17-02

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

June 14, 2002

Mr. Wayne Chun and Ms. Lily Chun
740 Canterbury Ave.
Livermore, CA 94550

Re: Fuel Leak Case No. RO0000382, 2301 Santa Clara Ave., Alameda, CA 94501

Dear Mr. and Ms. Chun:

Alameda County Environmental Health, LOP, has received and reviewed the May 8, 2002 Workplan for Pumping and Vapor Extraction Test for the referenced site, prepared by GeoSolv, your consultant. These tests are needed to properly design the extraction systems assumed to be appropriate remediation approaches for this site. To do this, three additional four-inch diameter extraction wells are necessary and will be placed on-site within the gasoline plume. Soil samples and groundwater samples will be collected from these wells to augment existing data and yield current information. A rose diagram for historic gradient is recommended and approved for your monitoring report. This pump test and vapor extraction test work plan is approved.

Our office provides the following technical comments:

- My April 1, 2002 letter requested you submit a groundwater monitoring report by April 16, 2002. To date we have not received this report.
- Your well installation report should be submitted within 45 days or no later than July 31, 2002.
- Your pumping and vapor extraction test report should be submitted by September 30, 2002.

Because you have not provided the groundwater monitoring report as requested, our office is recommending your eligibility to the Cleanup Fund be denied. In addition we will be contacting the Alameda County District Attorney's office to proceed with enforcement actions.

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. F. Goldman, GeoSolv LLC, 643 Oregon St., Sonoma, CA 95476
Ms. S. Knieriem, SWRCB Cleanup Fund, 1001 I St., Sacramento, CA 94244-2120
Ms. S. Torrence, Alameda County District Attorney Office

Wpapenf2301SantaClara

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



04-03-02

April 1, 2002
RO0000382

Mr. Wayne Chun and Ms. Lily Chun
740 Canterbury Ave.
Livermore, CA 94550

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

Re: Fuel Leak Case at 2301 Santa Clara Ave., Alameda, CA 94501

Dear Mr. and Ms. Chun:

Alameda County Environmental Health, Local Oversight Program (LOP), has recently reviewed the case file for the subject site and determined that additional work is needed to progress this site towards closure. Based upon the significant release of TPHg (gasoline) and BTEX at this site and the potential threat to human health, our office has requested remedial action be initiated immediately and groundwater sampling performed regularly to monitor your site's progress. Since 2000, our office has written the following correspondences to you:

- March 1, 2000 letter requesting a monitoring event by April 3, 2000, performing a Tier 1 Risk Based Corrective Action (RBCA) and the performance of a groundwater and vapor extraction test
- September 7, 2000 Notice of Violation letter
- October 16, 2000 letter acknowledging receipt of your October 12, 2000 monitoring report and request (again) for your RBCA and
- December 11, 2000 letter acknowledging receipt and review of your RBCA and request (again) for your groundwater and soil-vapor extraction test work plans.

No activity, known to our office, has occurred since this time.

We request that you address the following technical comments:

1. Groundwater Monitoring- Please perform a groundwater monitoring event on all existing site wells. Groundwater samples should be analyzed for the following compounds, TPHg, and by EPA Method 8260 for BTEX, MTBE, TAME, ETBE, DIPE, TBA, EDB and EDC.
2. Provide a work plan for your groundwater and soil-vapor extraction tests in addition to a schedule for the performance of these tests.

Mr. Wayne Chun and Ms. Lily Chun
April 1, 2002
2301 Santa Clara Ave., Alameda, CA 94501
RO0000382
Page 2

Technical Report Request:

Please submit the following technical reports according the following schedule:

- **April 16, 2002-** work plan for groundwater and soil-vapor extraction tests and schedule for their performance.
- **May 1, 2002** – groundwater monitoring report.

These reports are requested pursuant to the Regional Water Quality Control Board's authority under Section 13267 of the California Water Code.

It appears that there has been significant delay in performing requested actions at this site. We will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney Office, for possible enforcement follow up. Enforcement follow up may include administrative action or monetary penalties up to \$10,000 per day per each day of violation of the California Health and Safety Code, Division 20, Chapter 6.75.

In addition, upon further delay, our office will deem your site non-compliant resulting in ineligibility to funds from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004).

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. F. Goldman, GeoSolv LLC, 643 Oregon St., Sonoma, CA 95476
Mr. S. Ramdass, SWRCB Cleanup Fund, 1001 I St., Sacramento, CA 94244-2120
Ms. S. Torrence, Alameda County District Attorney Office
Mr. C. Headlee, SFRWQCB

Reprq2301Santa Clara Ave.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



12-12-00

20382

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

December 11, 2000
StID # 3838

Mr. Wayne Chun
265 Heron Drive
Pittsburg, CA 94565

Re: Subsurface Investigation at 2301 Santa Clara Ave., Alameda CA 94501

Dear Mr. Chun:

Our office has received and reviewed the Risk-Based Corrective Action (RBCA) evaluation for the above referenced site prepared by GeoSolv, LLC, your consultant. This evaluation was performed to evaluate current conservative potential risk to human health, justifying the need for active remediation at your site.

The conservative soil and groundwater concentrations used were the highest historical benzene concentration in soil (250 ppm) and the highest recent benzene concentration found in groundwater (21,000 ppb). Because a domestic water well was reported to be at the nearby Alameda High School (within 1000 feet), the drinking water exposure pathway was evaluate as was volatilization from a shower scenario. Soil vapor intrusion into a building for a commercial worker was evaluated using the highest soil concentration. These exposure pathways indicate that human health risk greatly exceeding the normally acceptable risk of one in a million, therefore, active remediation is necessary.

As was previously approved by our office, please submit a brief work plan and a schedule for the pending groundwater and soil-vapor extraction tests.

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. F. Goldman, GeoSolv LLC, 643 Oregon St., Sonoma, CA 95476

Mr. M. Owens, SWRCB Cleanup Fund, 1001 I St., 17th Fl., Sacramento CA 95814

RBCAsvgw2301

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



10-16-2000
Ro#382

October 16, 2000
StID # 3838

Mr. Wayne Chun
265 Heron Drive
Pittsburg, CA 94565

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

Re: Groundwater Monitoring Report for 2301 Santa Clara Ave., Alameda CA 94501

Dear Mr. Chun:

Our office has received and reviewed the October 12, 2000 GeoSolv groundwater monitoring report for the above site. As you will recall, this report was requested to be submitted to our office by October 10, 2000 as part of my September 7, 2000 Notice of Violation. **Please note your next deliverable date is November 13, 2000 when a risk based corrective action (RBCA) evaluation and a schedule for the previously approved groundwater and soil-vapor extraction tests are due.**

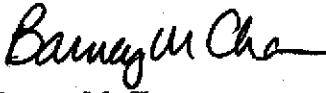
The results of this monitoring event confirm the presence of elevated concentrations of gasoline and BTEX (benzene, toluene, ethyl benzene and xylenes) at levels that are likely a risk to human health. The following additional observations are made from this report:

- The dissolved petroleum plume has moved towards the east and the gasoline and benzene plume are now seen as a long ellipse moving from the center of the site towards MW-11. Because of this off-site migration, your remediation should be expedited.
- The gradient is different from the past flow directions. Additional off-site receptors will have to be evaluated in your upcoming RBCA.
- Assuming the groundwater and soil-vapor extraction tests show positive results, the final design should be modified to account for the moving contaminant plume.
- It was noted that MTBE was not able to be quantified (ie the detection limit was raised) because of the elevated gasoline concentration. Because of the low primary and secondary cleanup level of MTBE, this analytical problem must be corrected in the future, after remediation occurs.
- Your consultant has been informed that a deep domestic well is reported to be located at Alameda High School. Please confirm that your site does not pose a threat to this potential conduit.
- The absence of free product does not necessarily indicate that natural bio-degradation is occurring at the site. With the migration of the plume, the mass of petroleum may be just being distributed over a larger lateral area. It should also be noted that the reported gasoline concentration in several of the wells is at or exceeds the soluble concentration of gasoline in water, therefore confirming the presence of free product.

Mr. Wayne Chun
StID # 3838
2301 Santa Clara Ave., Alameda CA 94501
October 16, 2000
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. F. Goldman, GeoSolv LLC, 643 Oregon St., Sonoma, CA 95476
Mr. M. Owens, SWRCB Cleanup Fund, 1001 I St., 17th Floor, Sacramento, CA 95814
comnt2301SantaClara

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 9-11-2000

20382

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

September 7, 2000
StID # 3838

Mr. Wayne Chun
265 Heron Drive
Pittsburg, CA 94565

NOTICE OF VIOLATION

**Re: Request for Technical Reports for Subsurface Investigation at 2301 Santa Clara Ave.,
Alameda, CA 94501**

Dear Mr. Chun:

Our office last wrote to you in my March 1, 2000 letter. In this letter, I commented on a submitted Remedial Action Plan (RAP) submitted by GeoSolv, LLC and requested that you perform groundwater monitoring at the above referenced site by no later than April 3, 2000. The results of the monitoring were to be submitted to my office within 30 days, ie May 3, 2000. To date, our office has not received the monitoring report.

This request was made because the last monitoring event submitted to our office was a May 1998 report. In this report, it appeared that a large portion of the site was impacted by free product (gasoline). This free product is located very close to the neighboring building north of your property. Other results from temporary borings indicate the gasoline plume may be beneath the mentioned building and pose a potential human health risk.

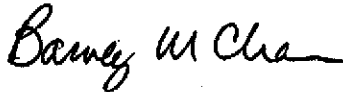
Using the results of this monitoring event plus the past results, GeoSolv was requested to perform a Risk Based Corrective Action (RBCA) evaluation. This evaluation would justify their proposed RAP, which our office conditionally approved. Because you have not performed the requested work, your site is considered out of compliance with our office and you're eligibility to the Cleanup Fund may be reconsidered. The Fund is being notified of your non-compliance by way of copy of this letter. **Caution! You are in jeopardy of losing Cleanup Fund reimbursement.** In addition, the failure to submit the requested report as required by the California Code of Regulations and the Water Code may subject you to civil liability.

We would like to give you an opportunity to come into compliance. **Please submit a groundwater monitoring report to our office within 30 days or no later than October 10, 2000. Within 30 days of this date, November 13, 2000, please submit a RBCA evaluation and the schedule for performing the previously proposed groundwater and soil vapor extraction tests.**

Mr. Wayne Chun
September 7, 2000
StID # 3838
2301 Santa Clara Ave., Alameda 94501
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. F. Goldman, GeoSolv LLC, 643 Oregon St., Sonoma, CA 95476

Mr. M. Owens, SWRCB Cleanup Fund Program, 2014 T. Ste 130, P.O. Box 944212,
Sacramento, CA 94244-2120

Reprq2301SantaClara

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SWT 3-2-2000
include ecls

R0382

March 1, 2000
StID # 3838

Mr. Wayne Chun
265 Heron Drive
Pittsburg, CA 94565

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

**Re: Remedial Action Plan for Dual Phase Groundwater Extraction & Vapor Extraction at
2301 Santa Clara Ave., Alameda, CA 94501**

Dear Mr. Chun:

Our office has received and reviewed the above referenced work plan prepared by GeoSolv, LLC and have also discussed its contents with Mr. Frank Goldman and Mr. Mark Laughton. A number of items were included in the Remedial Action Plan (RAP). This letter serves to comment on those items.

Although GeoSolv hoped to reduce the amount of groundwater sampling, it is critical to obtain a current groundwater sampling event to determine if conditions remain the same as those which the RAP was based upon. It appears that the last monitoring event at this site was performed in May 1998. **Please perform a monitoring event within 30 days or no later than April 3, 2000.** A monitoring report should then be submitted within 30 days.

GeoSolv recommends performing new vapor extraction and groundwater extraction tests. The original tests give an indication that these technologies would likely be effective at this site, however, they are not comprehensive enough to design a remediation system. The vapor extraction test proposes to be run at several vacuum pressures to optimize the radius of influence of the wells. An actual groundwater extraction test, as opposed to the slug test previously performed, is necessary to estimate the amount of groundwater able to be removed. This information will be used to design the correct size of the treatment unit. The number and locations of the extraction wells can be optimized and may be less in number than that shown in the RAP. Our office agrees with the proposal to perform these additional tests. We would request a modified RAP showing the actual number and locations of extraction wells along with the results of these tests.

After performing the requested monitoring event, please perform a Risk Based Corrective Action, (RBCA), evaluation justifying the need for the proposed remediation. You may choose to perform a Tier 1 evaluation if this clearly indicates potential unacceptable human health risk.

In regards to the RAP, please note that the figures should be labeled appropriately. It was also noted that the referenced calculation spread sheet for Figure 5 was missing from the report.

Our office will comment on the specifics of the remediation systems after the submittal of the modified RAP and new extraction test results report.

Mr. Wayne Chun
2301 Santa Clara Ave., Alameda 94501
StID # 3838
March 1, 2000
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. F. Goldman, GeoSolv LLC, 643 Oregon St., Sonoma, CA 95476

Mr. M. Owens, SWRCB Cleanup Fund Program, 2014 T St., Suite 130, P.O. Box 944212,
Sacramento, CA 94244-2120

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 9-29-99
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R10382

ENVIRONMENTAL HEALTH SERVICES

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

September 24, 1999
StID # 3838

Mr. Wayne Chun
265 Heron Drive
Pittsburg, CA 94565

Re: Request for Technical Report for 2301 Santa Clara Ave., Alameda CA 94501

Dear Mr. Chun:

This letter serves to allow you to remain in compliance and remain eligible for reimbursement from the Cleanup Fund. It appears that the last actions at the above referenced site was the Second Quarter 1998 monitoring which occurred on May 8, 1998. Since this time, you have changed consultants and enlisted the help of Mr. Frank Goldman of GeoSolv. He has submitted a May 17, 1999 work plan for a RAP (Remedial Action Plan) for my review and comment. In my June 15, 1999 letter to you, the work plan for the RAP was approved with a few minor clarifications. These clarifications included performing the site's risk assessment after performing some of the initial work (soil sampling, groundwater sampling, vapor extraction pilot test), providing specific design for the soil vapor and groundwater extraction systems and providing the specifications for post-remediation sampling. Your RAP was to be submitted to our office by July 16, 1999.

A recent conversation with Mr. Goldman informed me that you have been provided a RAP for this site several weeks ago. It appears that you are reconsidering proceeding in this project. Our office requests the immediate following actions:

- Please provide a current monitoring report for the above site. The last monitoring event reported free product in half of the 10 monitoring wells associated with this site. Based on the results of this monitoring event, you may have your consultant provide a modified monitoring schedule for our office's consideration.
- Please provide your RAP to our office along with a schedule for its implementation. You should be committed to both monitoring and remediation of this site.

Please submit the above reports to our office **within 30 days or no later than October 25, 1999**. Should you fail to submit the requested reports by the above deadline, I will instruct the Cleanup Fund to issue you a 90 day Compliance Letter for revocation of their reimbursement and I will notify the County and City of Alameda District Attorney Offices to proceed with enforcement actions.

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

Mr. Wayne Chun
StID # 3838
2301 Santa Clara Ave., Alameda 94501
September 24, 1999
Page 2.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files

Mr. F. Goldman, GeoSolv, 643 Oregon St., Sonoma, CA 95476

Ms. S. Knieriem, SWRCB, 2014 T Street, Suite 130, Sacramento CA 95814

Ms. J. Duerig, Alameda County District Attorney Office

RAP&mon2301

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

10382

June 15, 1999
StID # 3838

Mr. Wayne Chun
265 Heron Drive
Pittsburg, CA 94565

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

Re: Work Plan for the Remedial Action Plan (RAP) for the Cleanup of Soil and Groundwater at the former Bill Chun Service Station, 2301 Santa Clara Ave., Alameda CA 94501

Dear Mr. Chun:

Our office has received and reviewed the work plan for the design and implementation of a Remedial Action Plan (RAP) for the above site as prepared by GeoSolv, LLC. I have spoke with Messrs. Frank Goldman and Mark Laughton regarding its contents. Our office approves of this work plan, however, we have the following comments regarding each phase:

1. Initial Risk Assessment- A site specific risk assessment will be performed to identify receptors and generate site specific target levels (SSTL) for soil and groundwater cleanup. It is assumed that current conditions would fail a baseline, Tier 1, risk assessment. This is the basis for the required remediation.
2. To support the previous feasibility study results, a justification for the proposed treatment methodology will be given followed by the specific design of both the groundwater pump and treat and soil vapor extraction systems. The construction of the systems will include the installation of both groundwater extraction and soil vapor wells and individual groundwater pump and soil vapor extraction tests. Actual tests may differ significantly from the results of your prior consultant.
3. Post Verification Sampling- This section will propose the type of soil, groundwater and vapor sampling to be performed to verify that the cleanup standards have been met. It is assumed that an initial and regularly scheduled groundwater monitoring will be part of this section. Please comply with the sampling requirements of my May 17, 1999 letter when performing the initial monitoring. In addition, our office concurs with the approach to perform the pilot VET and aquifer test prior to performing the RBCA and then implement the system.

You may proceed with the Remedial Action Plan. Please submit your RAP to our office within 30 days or by July 16, 1999. Please contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. F. Goldman, GeoSolv, LLC, 643 Oregon St., Sonoma, CA 95476
Mr. E. Nichols, SWRCB, Cleanup Fund Program, 2014 T St., Suite 130, P.O. Box 944212,
Sacramento, CA 94244-2120 RAPwpap2301

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0382

May 17, 1999
StID # 3838

Mr. Wayne Chun
265 Heron Drive
Pittsburgh, CA 94565

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

Re: Request for Technical Reports for 2301 Santa Clara Ave., Alameda CA 94501

Dear Mr. Chun:

In our office's last correspondences with you, I commented and approved of the Corrective Action Plan (CAP) prepared by your consultant, ENSR and requested that you submit a time schedule for the implementation of the proposed dual-phase extraction system. The last letter was dated July 31, 1998. Since this time, our office has not received any reports from you.

On January 10, 1999, I was contacted by Mr. Frank Goldman of GeoSolv. He stated that you had chosen GeoSolv as your new consultant and that with some minor changes, they were proposing a similar remediation system as that proposed by ENSR. In a fax to our office, Mr. Goldman also requested a copy of the Preliminary Site Assessment Report by ESE, dated February 19, 1993. Having reviewed the County's files, I find the aforementioned report is actually dated March 31, 1993. Hopefully, you have been able to provide a copy of this report for Mr. Goldman.

Please be aware that you are still required to submit groundwater monitoring reports on a quarterly basis or at a less frequent basis as agreed upon by our office. The last groundwater monitoring report received by our office was the Second Quarter 1998 report for the sampling conducted on May 8, 1998. Please provide our office with all subsequent monitoring event reports. Groundwater samples should be run for TPH as gasoline, BTEX and MTBE. TPH as diesel was eliminated and is believed not to be present, while the testing for halogenated volatile organic compounds (HVOCs) was reduced to semi-annually. Our office recommends that either the sample exhibiting the highest MTBE concentration or a free product sample be run for MTBE using EPA Method 8240 or 8260 for confirmation. Please have your consultant contact me if this is not your understanding of the monitoring schedule. During your monitoring, an estimate of the thickness of any free product should be made and this information should be provided to support GeoSolv's proposal not to incorporate free product removal in their CAP.

Please submit your new CAP as prepared by your new consultant. The plan, as mentioned, should include a schedule for implementation subject to receiving regulatory approval. Please be reminded the failure to submit the requested reports may result in civil liability and enforcement from the Water Board and/or the District Attorney Office. In addition, it will eliminate you from the Underground Storage Tank Cleanup Fund due to non-compliance. Please submit all monitoring reports and the CAP to our office within 30 days or by June 21, 1999.

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

Mr. Wayne Chun
2301 Santa Clara Ave., Alameda CA 94501
StID # 3838
May 17, 1999
Page 2.

Sincerely,

Barney M. Chan

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. F. Goldman, GeoSolv, 643 Oregon St., Sonoma, CA 95476

Reprq2301

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#382

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

July 31, 1998
StID # 3838

Mr. Wayne Chun
265 Heron Drive
Pittsburg, CA 94565

Re: Request for Technical Reports for 2301 Santa Clara Ave., Alameda CA 94501

Dear Mr. Chun:

In my June 26, 1998 letter to you, I provided comments on the June 1998 ENSR report. This report made recommendations for actions for further site investigation and proposed the implementation of dual-phase extraction as the most applicable remediation approach for the site. I offered a few comments and approved of this remediation approach. I then requested a comment to my letter and a timetable schedule for the implementation of ENSR's recommendations. I additionally requested copies of Figures 5 and 6 omitted in the report. I have received copies of these figures, however, I have not received the other requested information.

Pursuant to the Water Code, Section 13267 (b), you are requested to submit a technical report responding to my letter plus a time schedule for, at a minimum, the submittal of a diagram of the proposed remediation system and the application for the appropriate permits for the extraction system. Each subsequent groundwater monitoring report must include the status of this work and anticipated efforts for the next quarter. You are also reminded that substantial civil penalty exists for the failure to submit the requested information.

Please submit this technical information within 30 days or by September 1, 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. A. Gibbs, ENSR, 10324 Placer Lane, Suite 200, Sacramento, CA 95827

Rep-2301

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0382

June 26, 1998
StID # 3838

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

Mr. Wayne Chun
265 Heron Drive
Pittsburg, CA 94565

Re: Corrective Action Evaluation and Feasibility Study for 2301 Santa Clara Ave.,
Alameda, CA 94501

Dear Mr. Chun:

Our office has received and reviewed the June 1998 ENSR report referenced above for the former Bill Chun Service Station. The report provides the history of the extensive soil and groundwater investigation which has occurred at this site. Although potential off-site sources of petroleum contamination may exist, it is likely that the majority, if not all, of the groundwater contamination currently present on-site originated from the former gasoline tanks on this site. This is especially evident due to the original conditions of the former tanks observed during removal and the elevated gasoline and BTEX concentrations found in the soils taken beneath the tank.

Our office has the following comments to the recommendations of ENSR:

- Please be aware that Shell Oil Products Company performed a subsurface investigation on the former Shell site at 2300 Santa Clara Ave. on January 26, 1998. The results of this investigation appear in Cambria Environmental's February 26, 1998 report entitled "Subsurface Investigation". Cambria concluded that the source of contamination being detected in MW-8 is not from the former Shell station. Our office, at this time, concurs with this evaluation.
- In regards to the well construction of MW-1 through MW-3, please be aware that these wells were screened from 10-25' bgs, the full extent of the well. When these wells were installed in 1993, groundwater was encountered at 15'. Therefore, the assumption made by ENSR is correct ie the well screen is below the current depth to water and free product may be unable to collect and be removed from these wells. I have enclosed copies of the boring logs for these wells.
- Certainly any drinking or irrigation wells in the immediate proximity of this site should be either tested or discontinued their use given the potential of gasoline, BTEX and MTBE contamination in groundwater.

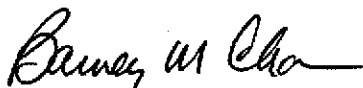
Mr. Wayne Chun
2301 Santa Clara Ave.
StID # 3838
June 26, 1998
Page 2.

- Because of the threat of the preferential groundwater migration along the mentioned sanitary sewer in the center of Oak St. you may want to perform a search for sensitive receptors along the utility, however, prior investigation indicates limited migration of groundwater along Oak St.
- In regards to determining cleanup standards for this site, our office recommends running total dissolved solids on the groundwater samples to determine potability. If the water is non-potable, concentrations exceeding MCLs may be allowed to remain. Otherwise, cleanup levels will be risk based. At this time, with the presence of liquid phase hydrocarbons in monitoring wells, a risk assessment is premature.
- Our office concurs with the proposed remediation approach, dual-phase extraction of both soil vapor and groundwater. Please insure that the wells which are pump tested are properly constructed ie the screen interval for wells tested for vapor extraction should be above groundwater.

Please provide a timetable for the implementation of the proposed recommendations after commenting or incorporating the County concerns. In addition, please have your consultant provide copies of Figures 5 and 6 as referenced in this report as they were missing from the County's copy.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist.

Enclosure

C: B. Chan, files
Mr. A. Gibbs, ENSR, 10324 Placer Lane, Suite 200, Sacramento, CA 95827

Capfs2301

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#382

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

March 23, 1998
StID # 3838

Mr. Wayne Chun
265 Heron Drive
Pittsburg, CA 94565

**RE: Request for Technical Reports for Former Service Station, 2301 Santa Clara Ave.,
Alameda, CA 94501**

Dear Mr. Chun:

Our office has received and reviewed the recently submitted, March 17, 1998 Groundwater Monitoring Report for the above referenced site as prepared by ENSR. The results are consistent with past results. Significant sheen was noticed in monitoring wells MW-1, MW-2 and wells MW-4 through MW-6. I also noticed that the contact person from ENSR has changed once again. This letter serves to request technical reports and to get back onto the schedule previously stated in Fugro West, Inc.'s August 14, 1996 work plan. The contents of this work plan was restated in ENSR's September 24, 1997 Project Progress Report.

The work plan proposed the following five specific tasks :

- Air monitoring within the Towata Flower Shop
- Destruction of monitoring wells MW-1 and MW-2
- Installation of two on-site wells to determine the extent of floating product beneath the existing building
- Installation of five temporary groundwater sampling probes and
- Report preparation.

The work plan was later modified such that the destruction of MW-1 and MW-2 would be on hold until the feasibility study was complete. In addition, instead of installing the two on-site wells, up to three direct push probes would be advanced.

Our office has received a copy of the ENSR October 8, 1997 report regarding the air monitoring at the Towata Flower shop. The results of this study indicate that vapor volatilization into the flower shop may not be occurring. In a January 13, 1998 conversation with Mr. Dan Etheridge of ENSR, he stated that he believed that the feasibility study had been completed, however, I have not heard from him since. It appears that he is no longer the project manager. Therefore, our office requests the following :

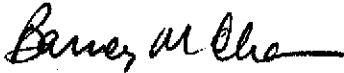
- Please provide a copy of the feasibility study for this site and a time schedule for its implementation
- Please provide a schedule for the advancement of the previously proposed direct push probes and the temporary groundwater sampling probe

Please provide the requested information within 30 days or by April 24, 1998.

Mr. Wayne Chun
March 23, 1998
StID # 3838
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. Alan Gibbs, ENSR, 10324 Placer Lane, Suite 200, Sacramento CA 95827

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Ro # 382

October 3, 1996

Mr. Wayne Chun
Bill Chun's Service Station
265 Heron Drive
Pittsburg, CA 94565-1916

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

STID 3838

Re: Workplan for investigations at the Former Bill Chun Service Station, located at 2301 Santa Clara Avenue, Alameda, California

Dear Mr. Chun,

This office has reviewed Fugro West, Inc.'s (Fugro) August 14, 1996 Workplan and Fugro's October 2, 1996 Addendum to the Workplan. The workplan, in combination with the addendum, is acceptable to this office, with the following reminders:

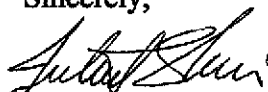
- o Please be reminded that Zone 7 permits are required for the destruction of Wells MW-1 and MW-2.
- o It is the understanding of this office that corrective action measures will be taken to remediate the floating product and possibly contain the plume from further migration immediately following this next phase of work.
- o Please wait a minimum of 24 hours after installing the wells before developing the wells, in order to prevent any potential volatilization of aromatics in the groundwater samples.

Per the workplan, field work will begin within two weeks of this letter. A report documenting the work should be submitted to this office within 45 days after completing all field activities. Immediate attempts should be made to work with Towata Flowers in obtaining access approval for vapor investigations at that site.

If you have any questions or comments, please contact me at (510) 567-6763.

Mr. Wayne Chun
Re: 2301 Santa Clara Ave.
October 3, 1996
Page 2 of 2

Sincerely,



Juliet Shin

Senior Hazardous Materials Specialist

cc: Peter B. Hudson
Fugro West, Inc.
44 Montgomery St., Ste 1010
San Francisco, CA 94104

Acting Chief

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#382

RAFAT A. SHAHID, DIRECTOR

April 3, 1996

Mr. Wayne Chun
Bill Chun's Service Station
265 Heron Drive
Pittsburg, CA 94565-1916

Alameda County Environmental Health Div.
Environmental Protection Services
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577
(510)567-6700 fax: (510)337-9335

STID 3838

Re: Investigations at 2301 Santa Clara Ave., Alameda, California

Dear Mr. Chun,

In response to your request on April 6, 1996, you may switch the frequency of monitoring from quarterly to semi-annual for the following wells: 1) Wells MW-4 and MW-10 because they have only identified very low concentrations; 2) Wells MW-1 and MW-2 because elevated concentrations, indicative of free product, have consistently been identified in these wells and wells with free product are generally not sampled; and 3) Well MW-8 because the contamination identified in this well is upgradient and appears to be attributable to the former Shell Service Station. If, at some point, significant increases in contaminant concentrations are noted in any of these wells, you may be required to switch back to quarterly sampling for those wells.

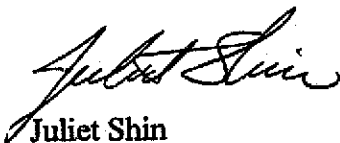
This office is requesting that the change in monitoring frequencies be implemented after this next sampling event. Due to the fact that groundwater samples collected from Wells MW-1 and MW-2 in 1993 identified levels of 1,2-dichloroethane (1,2-DCE), this office is requesting that all the eleven monitoring wells be sampled in the next monitoring event and analyzed for halogenated volatile organic compounds (HVOCs). Depending on the concentrations identified, you may not need to continue analysis for HVOCs in some of the wells.

Per our conversation on April 6, 1996, it appears that a potential threat to human health can be presumed for the site without conducting a formal risk assessment, due to the extensive amounts of free product on site. Therefore, instead of focusing your efforts on a risk assessment at this time, your emphasis should be on implementing the following: 1) characterizing the plume beneath the existing building on site and the adjacent Towata building; 2) proposing some sort of source removal to eliminate the potential human health hazard and to reduce contaminant concentrations in the groundwater; and 3) further delineate the lateral extent of the plume downgradient of the site (to the northeast and east). A work plan addressing these concerns should be submitted to this office within 60 days of the date of this letter. The work plan should address the feasibility of different approaches for source removal.

Mr. Wayne Chun
Re: 2301 Santa Clara Ave.
April 3, 1996
Page 2 of 2

If you have any questions or comments, please feel free to contact me at (510) 567-6763.

Sincerely,



Juliet Shin
Senior Hazardous Materials Specialist

cc: William Bassett, Jr.
Fugro West, Inc.
44 Montgomery St., Ste 1010
San Francisco, CA 94104

Acting Chief-File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Ro# 382

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

February 20, 1996

Mr. Wayne Chun
Bill Chun's Service Station
265 Heron Drive
Pittsburg, CA 94565-1916

STID 3838

Re: Investigations at 2301 Santa Clara Ave., Alameda, California

Dear Mr. Chun,

This office has reviewed over Fugro West, Inc.'s (Fugro) January 1996 report, documenting recent groundwater assessment results. Free product and elevated levels of soil and groundwater contamination both on and off site continue to be identified. Due to the potential for this contamination to pose a health threat to adjacent active businesses overlying the contaminant plume, further investigations and assessments will be required to determine how much of a current threat, if any, this contamination poses. This work should take first priority.

Additionally, this office concurs with Fugro's recommendations in the report. Better delineation of the observed free product needs to be conducted, which includes the areas beneath the on-site building and the Towata's Flower (Towata) building (located at 2305 Santa Clara Ave). Further characterization of the dissolved-phase hydrocarbons and soil contamination to the north/northeast and east towards Towata also needs to be conducted. It appears that the elevated contaminant concentrations identified on the Towata site is resulting from your site. This office reviewed the analytical results of soil samples collected beneath the former 500-gallon gasoline tank at the Towata site, and little to no TPHg or BTEX was identified in soil samples collected from beneath this tank or from the excavated material.

In response to Fugro's January 22, 1996 letter, plume containment measures are not required at this time. Containment measures may be required at a later date if further characterization of the contaminant plume indicates that the plume is migrating at a substantial rate, or if a human health or environmental threat is identified. Plume containment requirements could be addressed with remediation systems, such as enhanced bioremediation or air sparging and vapor extraction systems, in place of or in conjunction with the classic groundwater extraction system.

Quarterly groundwater sampling and product removal shall continue at the site. The next groundwater sampling event at the site should be conducted in February or March 1996.

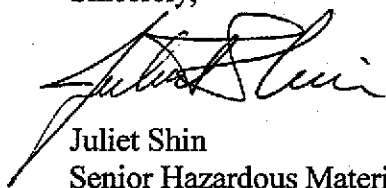
Mr. Wayne Chun
Re: 2301 Santa Clara Ave.
February 20, 1996
Page 2 of 2

Based on the elevated concentrations of TPHg and BTEX identified in Well MW-8 and boring P7 located upgradient from your site at the Former Shell Gas Station (2300 Santa Clara Avenue), it appears that there has been a release from this former Shell station and that the resulting contaminant plume may be commingling with your plume. At this time, this office will not be requiring you to further delineate the observed contamination upgradient of your site, to the south/southwest.

The requested human health risk assessment should be prepared and submitted to this office within 45 days of the date of this letter. Additionally, a work plan addressing further characterization of the free product and plume should be submitted to this office within 60 days of the date of this letter.

If you have any questions or comments, please feel free to contact me at (510) 567-6763.

Sincerely,



Juliet Shin
Senior Hazardous Materials Specialist

cc: William Bassett, Jr.
Fugro West, Inc.
44 Montgomery St., Ste 1010
San Francisco, CA 94104

Acting Chief-File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0382

RAFAT A. SHAHID, Assistant Agency Director

June 26, 1995

Mr. Wayne Chun
Quorum
265 Heron Drive
Pittsburg, CA 94565-1916

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

STID 3838

Re: Work plan for investigations at 2301 Santa Clara Ave.,
Alameda, California

Dear Mr. Chun,

This office has reviewed Fugro West's work plan, dated June 21, 1995, for investigations at the above site. This work plan is acceptable to this office. Prior to installing the proposed hydropunch on the other side of Santa Clara Avenue, please check the depths of the utility lines along this street to make sure that the utility trench isn't acting as a conduit for plume migration. Additionally, please be reminded that quarterly ground water monitoring and reporting should continue at the site.

Field work shall commence within 60 days of the date of this letter. A report documenting field activities should be submitted within 45 days after completing field activities.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin
Senior Hazardous Materials Specialist

cc: Stephen J. Boudreau
Fugro West, Inc.
44 Montgomery St., Ste 1010
San Francisco, CA 94104

Acting Chief

File

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0382

RAFAT A. SHAHID, Assistant Agency Director

February 28, 1995

Mr. Wayne Chun
Quorum
265 Heron Drive
Pittsburg, CA 94565-1916

ALAMEDA COUNTY CC 430-4510
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIVISION
1131 HARBOR BAY PKWY., RM.250
ALAMEDA, CAL. 94502-6577

STID 3838

Re: Investigations at 2301 Santa Clara Ave., Alameda, California

Dear Mr. Chun,

This office has reviewed Fugro's Third Quarter Ground water Monitoring Report, dated January 1995, and Site Assessment Report, dated February 1995. Elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg), Total Petroleum Hydrocarbons as diesel (TPHd), and benzene, toluene, ethylbenzene, and xylenes (BTEX) continue to be identified in all seven on-site monitoring wells. Additionally, free product has consistently been identified in on-site wells MW-5 and MW-7. Furthermore, the recent placement and sampling of borings HP-1 and HP-3, immediately off site to the north and southwest, identified elevated levels of TPHg and BTEX. This indicates that the ground water contaminant plume may be migrating off site.

Based on the above investigation results, you are required to further delineate the ground water contaminant plume to the north, south, and east. The delineation work should investigate the potential for the utility trench along Oak Street to act as a conduit for plume migration since the depth of this trench is fairly commensurate to the average water level depth in the area.

All future samples shall be analyzed for TPHg, TPHd, and BTEX. Additionally, any samples collected from the area of HP-3 shall be analyzed for chlorinated hydrocarbons based on the 54 parts per billion (ppb) of 1,2-dichloroethane identified in the ground water sample collected from HP-3.

Per Article 11, Title 23 California Code of Regulations, you are required to continue free product recovery at the site. Additionally, interim efforts must be made to prevent further migration of the ground water contamination off site until the site is remediated.

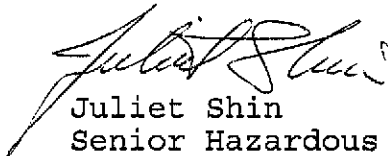
You are required to submit a work plan addressing the concerns expressed in this letter. The work plan shall be submitted to this office **within 60 days of the date of this letter.**

Mr. Wayne Chun
Re: 2301 Santa Clara Ave.
February 28, 1995
Page 2 of 2

Please be reminded that quarterly ground water monitoring and reporting shall continue for the site, per Article 5, Title 23 California Code of Regulations. In the Third Quarter Ground water Monitoring Report, dated January 1995, Well MW-2 was not monitored. All future quarterly reports shall include monitoring data for all the wells.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,



Juliet Shin
Senior Hazardous Materials Specialist

cc: Cheryl Gordon
State Water Resources Control Board
Division of Clean Water Programs
Underground Storage Tank Cleanup Fund
P.O. Box 944212
Sacramento, CA 94244-2120

Edgar Howell

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0382

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

May 16, 1994

Mr. Wayne Chun
Quorum
265 Heron Drive
Pittsburg, CA 94565-1916

STID 3838

Re: Work plan for investigations at 2301 Santa Clara Ave.,
Alameda, California

Dear Mr. Chun,

This office has reviewed Environmental Science & Engineering's (ESE) work plan dated April 28, 1994. This work plan is acceptable to this office with the following additional requirements/reminders:

- o The Regional Water Quality Control Board requires that permanent monitoring wells be installed to delineate the extent of the ground water contaminant plume, so that the plume can be monitored on a quarterly, or more frequent, basis. "Grab" ground water samples can only be used as a screening tool to determine the appropriate locations for the required permanent monitoring wells. **Within 45 days** after completing this phase of work, you will be required to submit a work plan addressing the installation of permanent monitoring wells to delineate the extent of the ground water contaminant plume.
- o It appears that overexcavation of the pit may not be essential, if you intend on employing a vapor extraction system at the site. However, since vapor extraction tests have not yet been conducted at the site to determine the effectiveness of this system in remediating the soil contamination, it may be beneficial to conduct a limited amount of overexcavation. However, if you intend on overexcavating beyond the area outlined in Figure 2 of the work plan, you will initially be required to conduct vapor extraction tests out at the site and prepare a feasibility study to choose the most effective and practical remedial solution for the site. A feasibility study may also eventually be required to determine the best available technology for remediating the ground water contaminant plume.

Mr. Wayen Chun
Re: 2301 Santa Clara
May 16, 1994
Page 2 of 3

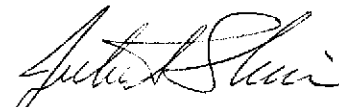
- o You are required to address the delineation of both soil and ground water contamination to the east and southeast. Soil samples collected from that end of the site identified up to 13,000 ppm Total Petroleum Hydrocarbons as gasoline (TPHg) and 250 ppm benzene. Additionally, ground water samples collected from that end of the site have identified up to 95,000 ppb TPHg and 28,000 ppb benzene.
- o Although the vapor extraction well, SV-1, was proposed to be screened down to 10 feet below ground surface, the water table has been recorded to be as shallow as 8.86 feet below ground surface at the site. If this well is to be used permanently for vapor extraction, could it pose a problem when the water table rises?
- o Please be aware that you are behind in your quarterly ground water sampling events. The last quarterly ground water sampling conducted out at the site was in September 1993.
- o If, in fact, a vapor extraction system is employed at the site, you will be required to submit information assuring this office that the generated air flow will not preferentially flow through the former tank pit area.

Please submit an addendum to the work plan addressing the above issues, within 20 days of the date of this letter.

To assist you in conducting off-site survey investigations, I have enclosed a map showing the locations of other Local Oversight Program sites near your site.

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

Sincerely,



Juliet Shin
Hazardous Materials Specialist

Mr. Wayne Chun
Re: 2301 Santa Clara
May 16, 1994
Page 3 of 3

cc: Michael Quillin
Environmental Science &
Engineering, Inc.
4090 Nelson Ave., Ste J
Concord, CA 94520

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0382

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

October 7, 1993

Mr. Wayne Chun
Bill Chun Service Station
265 Heron Drive
Pittsburg, CA 94565

STID 3838

Re: Investigations at 2301 Santa Clara Ave., Alameda, California

Dear Mr. Chun,

This office has received and reviewed ESE's Report of Findings, dated October 1, 1993. Contrary to ESE's statement in the report, this office feels that the elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg) and benzene observed in the wells leads us to believe that there is a great potential for off-site migration. Due to the concern over off-site migration and the requirement to completely delineate the extent of both soil and ground water contamination, under **Section 2725, Article 11, Title 23 California Code of Regulations**, you are required to install additional monitoring wells off site. A work plan addressing this concern shall be submitted to this office **within 60 days** of the date of this letter.

If it is determined that the ground water contaminant plume has migrated off site, you will be required, under **Section 2722, Article 11, Title 23 California Code of Regulations**, to conduct interim remediation measures to contain the plume from further migration. Additionally, you will eventually be required to remediate the soil and ground water contamination at the site.

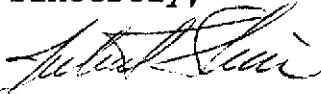
Per ESE's recommendation, overexcavation of the open tank pit is acceptable to this office. A short summary work plan must be submitted to this office for our review prior to this excavation. Please be reminded that a County Hazardous Materials Specialist is required to be out at the site during confirmation sampling of the overexcavation.

ESE discussed the possibility of an off-site source. At this time, this office does not have enough supporting evidence to accept this argument. It is your responsibility to conduct the necessary investigations to adequately determine whether there is an off-site source, before this office can get involved in this aspect of site investigations.

Mr. Wayne Chun
Re: 2301 Santa Clara
October 7, 1993
Page 2 of 2

Lastly, please have ESE include their field notes for well sampling in future quarterly ground water monitoring reports. If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,



Juliet Shin
Hazardous Materials Specialist

cc: Michael E. Quillin, RG
Environmental Science
& Engineering, Inc.
4090 Nelson Avenue, Ste J
Concord, CA 94520

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0382

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

August 31, 1993

Mr. Wayne Chun
Bill Chun Service Station
265 Heron Drive
Pittsburg, CA 94565

STID 3838

Re: Work plan for investigations at 2301 Santa Clara Ave.,
Alameda, California

Dear Mr. Chun,

This office has reviewed ESE's work plan for investigations at the above site. Per a conversation with Mr. Michael Quillin, ESE, on August 31, 1993, it is the understanding of this office that the proposed monitoring wells in this work plan will also address the area north/northwest of Well MW-1 by shifting the proposed well locations towards the on-site building. Additionally, it is the understanding of the office that the proposed location for Well MW-7 has been shifted towards the on-site building.

The work plan is acceptable to this office with the inclusion of the above changes. Per the timetable in the work plan, field work shall commence by September 3, 1993, and a report documenting this work will be submitted by September 24, 1993. If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Juliet Shin'.

Juliet Shin
Hazardous Materials Specialist

cc: Michael Quillin
Environmental Science &
Engineering, Inc.
4090 Nelson Ave., Ste. J
Concord, CA 94520

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0382

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 12, 1993

Wayne Chun
265 Heron Dr.
Pittsburg, CA 94565

STID 3838

Re: Further investigations at 2301 Santa Clara Avenue, Alameda,
California

Dear Mr. Chun,

This office has received and reviewed Environmental Science & Engineering's Preliminary Site Assessment report, dated March 31, 1993. Elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg) and Benzene, Toluene, Xylenes, and Ethylbenzene (BTEX) were identified in the capillary fringe of the soil from all three of the borings. Additionally, ground water samples collected from all three monitoring wells identified very elevated concentrations of TPHg, BTEX, and 1,2-Dichloroethane.

This office is concerned that the observed ground water contamination may be migrating offsite. **Per Section 2725, Article 11, Title 23 California Code of Regulations**, you are required to assess the vertical and lateral extent of both soil and ground water contamination at your site. Subsequent to delineating the extent of the soil and ground water contamination, efforts must eventually be made to contain and remediate the contamination.

Please submit a work plan to this office **within 60 days of the date** of this letter addressing the further delineation of soil and ground water contamination at the site. Quarterly monitoring and reporting shall continue until this site qualifies for Regional Water Quality Control Board (RWQCB) "sign-off".

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

Sincerely,

Juliet Shin
Hazardous Materials Specialist

Mr. Wayne Chun
Re: 2301 Santa Clara
April 5, 1993
Page 2 of 2

cc: Richard Hiatt, RWQCB

File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0382

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 5, 1993

Wayne Chun
2301 Santa Clara Ave.
Alameda, CA 94501

STID 3838

Re: Further investigations at 2301 Santa Clara Avenue, Alameda,
California

Dear Mr. Chun,

This office has received and reviewed Environmental Science & Engineering's Preliminary Site Assessment report, dated March 31, 1993. Elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg) and Benzene, Toluene, Xylenes, and Ethylbenzene (BTEX) were identified in the capillary fringe of the soil from all three of the borings. Additionally, ground water samples collected from all three monitoring wells identified very elevated concentrations of TPHg, BTEX, and 1,2-Dichloroethane.

This office is concerned that the observed ground water contamination may be migrating offsite. **Per Section 2725, Article 11, Title 23 California Code of Regulations**, you are required to assess the vertical and lateral extent of both soil and ground water contamination at your site. Subsequent to delineating the extent of the soil and ground water contamination, efforts must eventually be made to contain and remediate the contamination.

Please submit a work plan to this office **within 60 days of the date** of this letter addressing the further delineation of soil and ground water contamination at the site. Quarterly monitoring and reporting shall continue until this site qualifies for Regional Water Quality Control Board (RWQCB) "sign-off".

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

Sincerely,

Juliet Shin
Hazardous Materials Specialist

Mr. Wayne Chun
Re: 2301 Santa Clara
April 5, 1993
Page 2 of 2

cc: Richard Hiett, RWQCB

Michael E. Quillin
Environmental Science &
Engineering, Inc.
4090 Nelson Ave., Ste.J
Concord, CA 94520

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0382

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

Wayne Chun
2301 Santa Clara Ave.
Alameda, CA 94501

STID 3838

RE: Work plan for site located at 2301 Santa Clara Ave.,
Alameda, California

Dear Mr. Chun,

This office has received and reviewed Environmental Science & Engineering, Inc.'s work plan, dated December 16, 1992, for the above site. This work plan is acceptable to this office with the following additional requirements:

- o The monitoring wells are to be screened adequately above and below the ground water table to account for seasonal fluctuations (the standard screening interval is 10 feet below the water level and 5 feet above).
- o Ground water samples shall be collected only after a minimum of 24 hours after developing the wells.

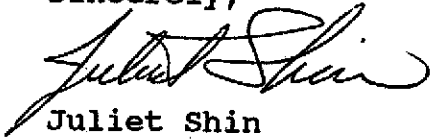
Per the conversation between Mr. Michael Quillin, ESE, and myself on December 30, 1992, Mr. Quillin stated that approximately 50 cubic yards of excavated soil resulted from the past tank removal and was stored on site. According to him, one composite soil sample was collected from this excavated soil and no contaminants were detected. Please be reminded that this soil must be disposed of off site. Please include the lab analysis results for this sample and the manifests for the removal of this soil in the future report documenting the implementation of the work plan.

A report documenting the results from work performed is due to this office within 45 days of completion of field activities. **Per Section 2652 (d), Article 5, Title 23 California Code of Regulations**, subsequent monitoring reports are to be submitted quarterly until this site qualifies for final RWQCB "sign-off".

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

Mr. Wayne Chun
Re: 2301 Santa Clara
December 30, 1992
Page 2 of 2

Sincerely,



Juliet Shin
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Michael E. Quillin
Environmental Science &
Engineering, Inc.
4090 Nelson Ave., Ste. J
Concord, CA 94520

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0382

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

October 2, 1992

Bill Chun
2301 Santa Clara Ave.
Alameda, CA 94501

STID 3838

RE: Required investigations at 2301 Santa Clara Ave., Alameda,
California

Dear Mr. Chun,

On July 31, 1992, two 550-gallon and one 285-gallon gasoline underground storage tanks (USTs) were removed from the above site. A two-inch diameter hole was observed at the bottom of the 285-gallon tank, and the analysis of soil samples collected from beneath all three of the USTs identified elevated Total Petroleum Hydrocarbons as gasoline (TPHg) as high as 16,000 parts per million (ppm), and benzene concentrations as high as 280 ppm.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that a ground water investigation be conducted whenever an unauthorized release of product is suspected from an underground storage tank. The levels of soil contamination associated with the above tanks would indicate that such an event has occurred.

You are required to conduct a **Preliminary Site Assessment (PSA)** to determine the lateral and vertical extent and severity of latent soil and ground water contamination which may have resulted from the release at the site. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks. The major elements of such an investigation are summarized in the attached **Appendix A**. The major elements of the guidelines include, but are not limited to, the following:

- o At least one groundwater monitoring well must be installed within 10 feet of the tank pit, oriented in the confirmed downgradient direction relative

Mr. Bill Chun
RE: 2301 Santa Clara Ave.
October 2, 1992
Page 2 of 4

to groundwater flow. In the absence of data identifying the confirmed downgradient direction, a minimum of three wells will be required to verify gradient direction. During the installation of these wells soil samples are to be collected at five foot depth intervals and any significant changes in lithology until groundwater is reached.

- o Subsequent to the installation of the monitoring wells, these wells must be surveyed to an established benchmark, with an accuracy of 0.01 foot. Additionally, groundwater elevations are to be measured monthly for three consecutive months and then quarterly thereafter. Groundwater samples are to be collected and analyzed quarterly. Both soil and groundwater samples must be analyzed for the appropriate fuel contaminants listed in Table 2 of the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks.

In order to proceed with a site investigation, you should obtain professional services of a reputable environmental consultant. Your responsibility is to have the consultant submit for review a PSA proposal outlining planned activities pertinent to meeting the criteria broadly outlined in this letter and the attached Appendix A.

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. The RWQCB may choose to take over as lead agency if it is determined following the completion of the initial assessment that there has been a substantial impact to groundwater.

The PSA proposal is due within 45 days of the receipt of this letter. Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for final RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter.

Mr. Bill Chun
RE: 2301 Santa Clara Ave.
October 2, 1992
Page 3 of 4

The referenced initial and quarterly reports must describe the status of the investigation and must include, among others, the following elements:

- o Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of groundwater contamination characterization
- o Interpretation of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations or plans for additional investigative work of remediation

All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. Please include a statement of qualifications for each lead professional involved with this project.

Please be advised that this is a formal request for technical reports pursuant to **California Water Code Section 13267 (b)**. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

If you have any questions or comments, please contact Juliet Shin at (510) 271-4320.

Sincerely,


Juliet Shin
Hazardous Materials Specialist

Mr. Bill Chun
RE: 2301 Santa Clara Ave.
October 2, 1992
Page 4 of 4

Attachment

cc: Richard Hiatt, RWQCB

Richard Quarante, Alameda Fire Dept.

James Parker
Parker Environmental Services
4185 Rialto Court
Pittsburg, CA 94565

Edgar Howell-File (JS)