

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



12-27-00

RO400

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

December 22, 2000

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Rd., Suite 100
Auburn Hills, MI 48326

Dear Mr. Moffatt:

Subject: Broadway Volkswagen, 2740 Broadway Ave., Oakland, CA 94612
StId 470

"Sampling & Closure Report, Property #4826..." dated March 24, 2000 prepared by Environmental Science & Engineering was reviewed. We do not agree with its conclusion that case closure is warranted because:

- 1) The most recent groundwater sample from monitoring well, MW-3, collected on August 3, 1999, showed a discernible increase for all contaminants. The concentrations for TPH-G and BTEX were 21,000 ug/l, 5,500 ug/l, 2,300 ug/l, 470 ug/l, and 990 ug/l, respectively. The prior samples collected on 12/13/96 and 10/7/97 were NonDetectable (ND) or close to ND for all contaminants. The increase in contaminant concentrations may indicate that the plume has not stabilized. Therefore, groundwater monitoring needs to be continued. Additionally, include vapor wells, VW-1, 2, and 3, for groundwater monitoring to better characterize the plume.
- 2) Risk assessment should use the Oakland Risk Based Corrective Action (RBCA) levels instead of Preliminary Remediation Goals (PRG). The Oakland RBCA levels are intended to address human health and environmental concerns at sites in Oakland. For information about the Oakland RBCA process, contact Mark Gomez of the City of Oakland Public Works Agency, Environmental Services Division, 510/238-7314.

Other information needed include:

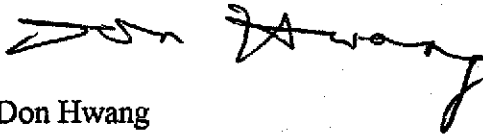
- a) Groundwater gradient maps for January 21, 1989, June 27, 1996, September 19, 1996, December 13, 1996, and October 7, 1997, to evaluate the movement of the plume.
- b) Whether the Halogenated Volatile Organic Compounds (HVOC's) onsite result from an onsite or an offsite source. Although HVOC's may be handled separately, it would seem to be advantageous to incorporate sampling and analyses for HVOC's when samples for other contaminants are collected.
- c) Remediation of the HVOC's may be required unless the concentrations are less than RBCA levels and are stable.

Submit a workplan to satisfy the above issues.

Mr. Moffat
December 22, 2000
Page 2 of 2

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

Sincerely,

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

Don Hwang
Hazardous Materials Specialist

u
C: Thomas Dalzell, QST Environmental, Inc., 1320 Arnold Dr., Suite 236, Martinez, CA
94553

file

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0400

ENVIRONMENTAL HEALTH SERVICES

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

August 11, 1999

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Road, Ste 100
Auburn Hills, MI 48326

STID: 470

Re: HVOCs investigations at the Broadway Volkswagen site, located at 2740 Broadway Ave., Oakland, CA

Dear Mr. Moffatt,

On June 15, 1999, this office sent you a letter requiring you to submit a workplan addressing the HVOCs issue at the above site by July 27, 1999. Your consultant Thomas Dalzell, Environmental Science & Engineering, Inc., submitted a letter dated July 16, 1999 stating that he would forward a review of historical uses at the site to Alameda County (County). Additionally, per your message on August 10, 1999, you stated that you had ordered a title search for the site and were planning to conduct interviews to obtain more information on possible HVOCs before submitting a proposal to the County. Since the initial workplan due date of July 27, 1999 has passed, this office is requiring that you submit a **Schedule of Work (SOW)** detailing the various phases of your intended research and the submittal of your proposal, as well as when each phase of work will be completed. **This SOW must be submitted within the next two weeks (i.e., by August 25, 1999).**

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

Sincerely,


Juliet Shin, R.G.
Hazardous Materials Specialist

Cc: Thomas D. Dalzell
1340 Arnold Dr., Ste 126
Martinez, CA 94553-4189

Derek Lee, RWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0400

ENVIRONMENTAL HEALTH SERVICES

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

June 21, 1999

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Road, Ste 100
Auburn Hills, MI 48326

STID: 470

Re: Workplan addressing investigations associated with the former USTs at Broadway Volkswagen, located at 2740 Broadway Ave., Oakland

Dear Mr. Moffatt,

This office has reviewed QST Environmental's June 11, 1999 workplan addressing the required verification monitoring for the above site. This workplan is acceptable to this office with the following conditions:

- Please be reminded to wait a minimum of 72 hours after developing Wells MW-1 and MW-3 before purging and sampling them.
- In addition to the proposed analysis of groundwater samples for benzene, groundwater analysis must also include, TPHg, toluene, ethylbenzene, total xylenes, and MTBE.

The workplan must be implemented within 45 days of the receipt of this letter, (i.e., by ~August 6, 1999). A report documenting the work shall be submitted to this office within 45 days after completing field activities.

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

Sincerely,

Juliet Shin
Hazardous Materials Specialist

Cc: Thomas D. Dalzell
QST Environmental
1340 Arnold Dr., Ste 126
Martinez, CA 94553

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20400

ENVIRONMENTAL HEALTH SERVICES

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

June 15, 1999

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Road, Ste 100
Auburn Hills, MI 48326

STID: 470

Re: Required investigations for the HVOC contamination at the Broadway Volkswagen site, located at 2740 Broadway Ave., Oakland, CA

Dear Mr. Moffatt,

This office has received your letter, dated May 21, 1999, proposing that the chlorinated hydrocarbon contamination (VOCs) be investigated after the UST-related issues are formally closed. Per Alameda County's and the Regional Water Quality Control Board's (RWQCB) statements at the April 26, 1999 meeting, **you are required to conduct investigations for the VOCs in conjunction with the UST-related investigations.** Per the County's meeting notes, we agreed on April 26, 1999 that a workplan for the VOC contamination would be submitted by June 08, 1999. We also discussed in detail the type of work that would be expected from Vorelco, Inc. to address the VOC contamination, and the County even summarized some of the work in it's April 27, 1999 to your office.

Per the California Water Code Section 13267, you are required to submit a workplan addressing the VOC investigations to this office by July 27, 1999. Additionally, per Section 6.92.040L of the Alameda County Ordinance Code, the County is requiring the submittal of a deposit for \$1,500.00, made payable to Alameda County Environmental Health Services, with the workplan to cover oversight costs. Per the California Water Code Section 13268, any person failing or refusing to furnish the required reports may be pursued for civil liability by the RWQCB, which may result in a fine of up to \$1,000.00 for each day in which the violation occurs.

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

Sincerely,

Juliet Shin
Hazardous Materials Specialist

Cc: Thomas Dalzell
QST Environmental
1340 Arnold Drive, Ste 126
Martinez, CA 94553-4189

Derek Lee, RWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO# 400

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

April 27, 1999

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Road, Ste 100
Auburn Hills, MI 48326

Re: Required investigations for the HVOC contamination at the Broadway Volkswagen site, located at 2740 Broadway Ave., Oakland, CA

Dear Mr. Moffatt,

Per our meeting on April 26, 1999, it was determined that the Halogenated Volatile Organic Compounds (HVOCs) observed in the groundwater beneath the site does not appear to be resulting from the on-site underground storage tanks (UST). However, it is still uncertain whether the HVOC contamination is coming from on site or off site, and further HVOC investigations will be required. Therefore, the petroleum contamination associated with the former USTs will continue to be handled under the Local Oversight Program (LOP), while the HVOC issues will be handled under the SLIC Program. Since Vorelco, Inc. (Vorelco) has chosen to maintain that the HVOC contamination is coming from off site, Vorelco will be responsible for providing sufficient information to support its position, to the satisfaction of this office and the Regional Water Quality Control Board. Per our meeting, the following is a list of some of the discussed information/investigations that may be necessary in determining whether the HVOC contamination is coming from off site or on site: 1) submittal of a detailed history of site uses/operations; 2) sufficient information on other sites in the vicinity that strongly suggests that one or a number of these sites are sources of the HVOC plume; 3) reviewing utility line locations, slopes, backfill materials, etc. to assist in identifying any localized variations in groundwater flow directions and to assist in identifying any potential conduits for contaminant migration; and/or 4) the collection of an upgradient groundwater sample to determine whether the upgradient concentrations are higher and therefore coming from an off-site source.

A workplan addressing this work should be submitted to this office within 45 days of the date of this letter, (i.e., by June 08, 1999). If it is determined through further investigations that the HVOC contamination is coming from off site, than Vorelco will be relieved of all responsibilities associated with the HVOCs. If it cannot be shown that the HVOCs are coming from off site, the site will remain open and Vorelco will be responsible for preparing a Risk Management Plan for the site and conducting on-going groundwater monitoring. The Risk Management Plan may include a human health risk assessment.

As discussed in our meeting, a deposit/refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code for the County's oversight costs for SLIC cases. Please submit a deposit of \$1,500.00 made payable to Alameda County Environmental Health Services within three weeks of the receipt of this letter, (i.e., by May 18, 1999). It is expected that the

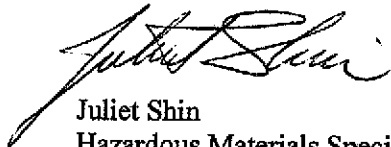
Tom Moffatt
Re: 2740 Broadway Ave.
April 27, 1999
Page 2 of 2

amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested, or any unused amount will be refunded to you or your designee. Work on this project will be debited at the Ordinance specified rate, currently \$100 per hour.

Lastly, per your request, attached is a copy of the Tier 1 Table of the American Society of Testing and Materials' Risk-Based Corrective Action Guidelines (ASTM RBCA) (E 1739-95). My copy has been adjusted by multiplying the Risk-Based Screening Level (RBSL) values for benzene by a factor of 0.29 to obtain the corrected value for California's toxicity value.

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

Sincerely,



Juliet Shin
Hazardous Materials Specialist

ATTACHMENT

Cc: Thomas Dalzell
QST Environmental
1340 Arnold Drive, Ste 126
Martinez, CA 94553-4189

Rose Scott
QST Environmental
1340 Arnold Drive, Ste 126
Martinez, CA 94553-4189

Larry Froebe
QST Environmental
3545 Howard Way, 2nd Flr
Costa Mesa, CA 92626-1418

Files-JMS

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#400

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

March 15, 1999

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Road
Auburn Hills, MI 48326

STID: 470

Re: Review of the March 1, 1999 Closure Request Report and the requirement for additional work at the Broadway Volkswagen site, located at 2740 Broadway Ave., Oakland, CA

Dear Mr. Moffatt,

This office has received and reviewed QST Environmental's (QST) Site Closure Report, dated March 1, 1999, requesting closure for the above site. The following is a list of our comments on the Site Closure Report and a summary of additional information and work that will be needed for this site to be considered for closure:

- The discussions on risk assessments in the Closure Report compares concentrations of the gas constituents (TPHg and BTEX) to California's Maximum Contaminant Levels (MCLs) and U.S. Environmental Protection Agency's Preliminary Remedial Goals (PRGs), however, application of the more conservative values given in the American Society for Testing and Material's Risk-Based Corrective Action Guidelines (E 1739-95)(ASTM RBCA) are required to assess human health risk. The San Francisco Bay-Regional Water Quality Control Board (RWQCB) has recommended the use of these guidelines for risk assessment purposes. Additionally, if it cannot be confirmed that the VOC concentrations of TCE and DCA are coming from off site, a proper human health risk assessment will be required to address the VOC concentrations.

Having reviewed our files, the highest concentrations of benzene in soil have been identified in sample B-D2 at 2.2ppm from 7-feet below ground surface (bgs); in sample B-D1 at 1.4ppm from 13-feet bgs; in sample B-C1 at 1.3ppm from 13-feet bgs; in soil boring SB-3 at 1.2ppm from 10-feet bgs; and boring SB-4 at 0.6ppm from 15-feet bgs. These benzene concentrations in soil exceed ASTM RBCA's Tier 1 table threshold values for the "soil vapor intrusion into outdoor air" pathway (1.3ppm) and the "soil vapor intrusion into indoor air" pathway (0.003ppm) for a commercial site at 10^{-5} risk.

- The Closure Report states that the vapor extraction system probably mitigated the benzene concentrations formerly observed in the on-site soils. However, Verification Monitoring is required to confirm the success of this Corrective Action, per Article 11 Title 23 California Code of Regulations. Therefore, soil samples shall be collected from areas of the site formerly identifying contaminant concentrations of concern. Additionally, mitigation of groundwater contaminants shall be confirmed as well with the sampling of on-site Wells MW-1 and MW-3. Samples shall be analyzed for TPHg and

Tom Moffatt
Re: 2740 Broadway
March 15, 1999
Page 2 of 4

BTEX. If concentrations of benzene in the soils is Non Detect or below ASTM RBCA's Tier 1 table threshold values, then no risk assessment addressing these gas constituents will be required.

This office is also requesting that an explanation be provided as to why contaminant concentrations of TPHg and BTEX were so much higher in the influent samples collected from the groundwater extraction system on August 19, 1997, as compared to the significantly lower concentrations in the on-site wells that had persisted for at least several prior quarterly sampling events.

- Although QST argues that the VOC concentrations on site are coming from off site, the information in our files cannot yet substantiate that claim. Equipotential maps have consistently shown since 1991, that groundwater flows towards the north/northeast in the direction of former off-site Well MW-6, which contained the highest concentrations of TCE. Additionally, an isocentration map for TCE from October 18, 1991 indicates that the highest TCE concentrations were originally on site. This would seem to indicate that concentrations from on site may have migrated to off-site Well MW-6. There has only been one instance, in May 1991, where the groundwater was shown to be flowing to the south. In this case, the groundwater flow direction was determined by only using on-site Wells MW-1, MW-3, and MW-4.

Further investigations need to be conducted to confirm the groundwater gradient, so that this office may be able to accurately compare upgradient concentrations to downgradient concentrations to confirm that the VOCs are, in fact, coming from off site. **Additionally, a detailed investigation shall be conducted to locate any utility lines that may be influencing groundwater flow directions, acting as a conduit for VOC contaminant transport, or providing a conduit for dumping of contaminants.**

According to file searches that were conducted by your consultants in 1991, eight sites in the vicinity of your site were identified as possible sources of the VOC contamination. However, insufficient information has been provided to prove that any of these eight sites are truly the source of the VOC contamination, and none of these sites are typical or definitive sources of VOCs, such as in the case of a dry cleaner. All eight sites were listed as auto-related businesses, such as car dealerships, transportation services, and gas stations.

- It is unclear as to whether the wells were ever surveyed to Mean Sea Level from an established benchmark, or whether these wells were only to an arbitrary benchmark. As part of future investigations, all wells used to determine groundwater flow directions must be surveyed to Mean Sea Level, to assure an accurate gradient determination. Due to ground settlement, an arbitrary benchmark may not prove to be effective in attaining accurate groundwater depths and gradient determinations.

Tom Moffatt
Re: 2740 Broadway
March 15, 1999
Page 3 of 4

- Your consultants have argued that the groundwater at the site is "perched", and that the site's different groundwater flow directions can be attributed, in part, to this "perched" water. However, it appears that groundwater is not only contained in the silty/sand lenses that your consultants have stated carried the "perched groundwater", but also in the clayey soils surrounding these areas. According to boring logs for Wells MW-1 and MW-2, these wells were drilled through solely clayey materials, yet these wells were never dry and never had difficulty in recharging during purging and sampling. Therefore, there only appears to be one aquifer at the site. The silty/sand lenses may provide a preferential flow path for some of the contaminants, however, this office currently has insufficient information to indicate that these areas are perched.
- According to Environmental Science and Engineering's report, dated July 10, 1991, Well MW-2 was found abandoned and improperly destroyed. Was this well ever properly destroyed. If so, you are required to submit the Well Destruction permit for this well to our office. Additionally, please submit a copy of the Well Destruction permit for Wells MW-4, MW-5, and MW-6. If Well MW-2 has not been properly destroyed, it must be located and closed properly, because it may act as a conduit for future contaminant infiltration into groundwater.

A workplan addressing the above additional work, and possibly a revised risk assessment, shall be submitted to this office within 60 days of the date of this letter (i.e., by May 10, 1999). Any requests for extensions of this deadline shall be submitted to this office in writing.

The State Water Resources Control Board manages an Underground Storage Tank Cleanup Fund (Fund) to help eligible Responsible Parties to obtain reimbursement for costs of investigating and remediating releases from petroleum underground storage tanks. You are encouraged to apply. To obtain an Application Package, contact the Fund at the following:

State Water Resources Control Board
Division of Clean Water Programs
UST Cleanup Fund
P.O. Box 944212
Sacramento, CA 944212
Telephone: (916) 227-4307

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

Sincerely,


Juliet Shin
Hazardous Materials Specialist

Tom Moffatt
Re: 2740 Broadway
March 15, 1999
Page 4 of 4

Cc: Dennis Callahan
QST Environmental
3545 Howard Way, 2nd Floor
Costa Mesa, CA 92626

Larry R. Froebe, Ph.D.
QST Environmental
3534 Howard Way, 2nd Floor
Costa Mesa, CA 92626

Tom Dalzell
QST Environmental
1340 Arnold Drive, Ste 126
Martinez, CA 94553



January 9, 1998

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Rd.
Auburn Hills MI 48326

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

RE: Soil and Groundwater Contamination, Discussion of Case Closure Requirements for Broadway Volkswagen, 2740 Broadway, Oakland 94612 (Our site # 470)

Dear Mr. Moffat:

I am writing to follow up on the telephone conference among ourselves, Tom Dalzell and Micah Rapoport of QST Environmental. During the conference, the following points were discussed regarding next steps for case closure:

- A risk evaluation will be performed by a qualified consultant in accordance with the procedures outlined in *ASTM E 1735 - 95 Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites*. The risk evaluation would be used to determine whether the benzene and other contaminants, including chlorinated compounds, remaining in place pose a significant human health risk given the site conditions, whether additional investigation or remediation is needed, and whether any use restrictions would be appropriate for the property. **You may wish to have the risk evaluation done using currently available soil and groundwater data.** However, the consultant indicated that at least one additional round of groundwater sampling is planned.
- If additional groundwater sampling is done, you should analyze for all contaminants of concern, including TPHg, BTEX and HVOCs. Chlorinated compounds still are an issue of concern. I have spoken with both Eva Chu and Tom Peacock of this Office about the matter of HVOC testing, and both of them believe that consideration of HVOC levels is appropriate for case closure.

It seems that some misunderstanding surrounds both Tom Peacock's and Eva Chu's opinions regarding continued testing for HVOCs, and I would like to provide clarification. I spoke with Mr. Peacock immediately following our teleconference. He recalls the case and a meeting he had with you in December of 1992. I have enclosed a copy of the letter Tom Peacock wrote in April of 1993 referring to issues discussed at that meeting. Mr. Peacock said today that he agrees there is evidence of offsite sources. He also has said that he does not believe it has been proven that the HVOCs in your wells actually came from offsite. Also, Eva Chu recently reread the case documents and advised that HVOCs levels should be considered for case closure. Her approval of the 1995 Remedial Action Plan, which omitted any mention of HVOC testing, should not be construed as her approval to discontinue such testing.

Tom Moffat
RE: Broadway Volkswagen
December 30, 1997
Page 2 of 2

Below I have summarized why this office is asking that HVOC concentrations be considered for case closure:

- We are not convinced that the HVOCs found in your wells are coming from an offsite source. It is difficult to draw any definite conclusions from the data about the source of the contamination. Some of the highest concentrations of HVOCs were found in wells located down- or slightly cross-gradient from the 28th St. tank pit. The wells that may have been the best source of information about HVOC plume patterns, MW-5 and MW-6, were closed in March of 1994. The two remaining wells and the new well (MW-7) were not tested for HVOCs after MW-5 and MW-6 were closed.
- HVOCs are one of the array of contaminants found in your wells, and they can not be ignored when considering case closure. In other groundwater contamination cases, this Office routinely requires responsible parties to monitor contaminants of concern that have been identified at the site, especially if there is reason to believe they may have been used or stored there. Chlorinated solvents have been commonly used in automotive repair in recent years. It was not unusual in the past for mechanics to dispose of chlorinated compounds in waste oil tanks. File records indicate that waste oil tanks were located in all three former tank pits. Chlorinated compounds have been known to find their way to groundwater even when they have not been stored in underground tanks, but were used or stored only above ground. In fact, they often are referred to as "sinkers", meaning they tend to migrate downward through soil and into groundwater.
- HVOC concentrations were increasing in all three closed wells (MW-4, MW-5 and MW-6) and fluctuating in MW-3 prior to the last HVOC sampling event in July of 1993.
- Remedial action has depressed TPHg and BTEX levels. It may have had the same effect on HVOC levels. The results of HVOC testing may be favorable to your case for closure.

I understand your concerns regarding testing for HVOCs. I hope that this letter adequately outlines why this Office is asking you to test for these contaminants if further groundwater sampling is done. Micah Rapoport has told me that QST plans to test the monitoring wells soon. As I discussed with Mr. Rapoport, I would not object to a short delay in well testing until you have had a chance to review this letter and other case documents. Let me know if you are still interested in a face to face meeting in the next month. You may contact me at (510)567-6770 with any questions.

Sincerely,



Pamela J. Evans
Senior Hazardous Materials Specialist

c: Tom Peacock, Alameda Count Environmental Health Services
Micah Rapoport, QST Environmental Inc., 1340 Arnold Dr., Suite 126, Martinez CA 94553

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

RO# 400

December 10, 1997

Tom Moffatt
Vorelco, Inc.
3800 Hamlin Rd.
Auburn Hills MI 48326

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

**RE: Soil and Groundwater Contamination, Case Closure Requirements for
Broadway Volkswagen, 2740 Broadway, Oakland 94612 (Our site # 470)**

Dear Mr. Moffat:

I have reviewed the case file and spoken with Micah Rapoport of QST Environmental. I am not able to issue a closure letter at this time for the following reasons:

- Benzene has been detected at concentrations that exceed conservative human health risk screening levels. The highest concentrations of benzene were found in soil that remains in place in the former tank pit (tanks C and D) and from borings done in the sidewalk along 28th St. These sources are located within a few feet of the building. Well data show that benzene was found in groundwater beneath the building itself. Micah Rapoport has told me that soil analysis data also is available from borings done to advance the vapor wells and MW-7. This additional data should tell us more about the extent and concentration of the benzene contamination beyond the tank pit.

An appropriate next step toward case closure is to have a risk evaluation performed by a qualified consultant. The risk assessor needs to follow the procedures outlined in *ASTM E 1735 - 95 Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites*. The risk evaluation would be used to determine whether the benzene and other contaminant levels (such as chlorinated compounds) remaining in place pose a significant human health risk given the site conditions, whether additional investigation or remediation is needed, and whether any use restrictions would be appropriate for the property.

- At least one additional round of groundwater sampling for fuel constituents (TPHg and BTEX) and chlorinated organic compounds should be done within the next 30 days. While TPHg and BTEX concentrations have dramatically decreased, I remain concerned about chlorinated compounds. Although a letter from this Office dated September, 1994 directed that testing for chlorinated compounds in groundwater should be ongoing, no testing for these compounds is reported after July of 1993. In order to determine current groundwater concentrations, to examine whether shallow and deeper aquifers have similar flow directions and to better establish the source of chlorinated compounds, additional groundwater analysis is needed.

I recently assumed case oversight responsibility from Eva Chu. You may contact me at (510)567-6770 with any questions.

Sincerely,

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Dick Pantages, Alameda County Environmental Health Services
Micah Rapoport, QST Environmental Inc., 1340 Arnold Dr., Suite 126, Martinez CA 94553

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#400

August 29, 1997
STID 470

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

Vorelco, Inc. 4A01
ATTN: Tom Moffatt
3800 Hamlin Rd.
Auburn Hills, MI 48326

Re: 2740 Broadway, Oakland, CA 94612

Dear Tom Moffatt:

This office received and reviewed a Report of Groundwater Monitoring for the above site by ESE dated January 1997. The following comments pertain to this report:

1. You need to test for MTBE during the next monitoring well sampling event.
2. It appears that the treatment system is working very well. This site may be eligible for closure soon. Due to the rapid reduction of benzene in MW-3 you should do another round of monitoring as soon as possible. After all, it has been 8 months since the last round of monitoring was done.

If you have any questions please call this office at (510) 567-6782.

Sincerely,

Thomas F. Peacock, Manager
Hazardous Material Division

c: Gordon Coleman Chief - Files
Manager, Broadway Volkswagen, 2740 Broadway, Oakland, CA
94612
Karen Faber, Environmental Science & Engineering, Inc., 4090
Nelson Ave., Suite J, Concord, CA 94520

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO 400

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

StID 470

September 29, 1995

Mr. Tom Moffatt
Core Resources Inc
3800 Hamlin Rd
Auburn Hills, MI 48326

RE: RAP Approval for 2740 Broadway, Oakland 94612

Dear Mr. Moffatt:

I have completed review of ESE's August 1995 Remedial Action Plan for the above referenced site. The proposal to use a soil vapor extraction and water entrainment system to remediate petroleum hydrocarbons in affected soil and groundwater beneath the site is acceptable. Field work should commence within 60 days of the date of this letter, or by **November 30, 1995**. Please notify me at least 72 hours prior to the start of field activities.

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

eva chu
Hazardous Materials Specialist

cc: Bart Miller, ESE, 4090 Nelson Ave, Suite J, Concord 94520
Broadway Volkswagen, 2740 Broadway, Oakland 94612
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0400

RAFAT A. SHAHID, Assistant Agency Director

StID 470

March 14, 1995

Mr. Tom Moffatt
Core Resource Inc
3800 Hamlin Rd
Auburn Hills, MI 48326

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

RE: RAP for 2740 Broadway, Oakland 94612

Dear Mr. Moffatt:

I have completed review of ESE's January 1995 Report of Findings, Soil Vapor Extraction Test for the above referenced site. The performance test indicates that soil vapor extraction is a feasible method for remediating contaminated soil in the vicinity of the former fuels tanks beneath 28th Street. As recommended by ESE, a remedial action plan (RAP) should be prepared detailing the design of the system to be used. The RAP is due within 60 days of the date of this letter, or by May 15, 1995.

Also, the last sampling event took place in July 1993. At this time, you are directed to reinstate a quarterly schedule of well sampling and monitoring. Technical summary reports documenting each well sampling and monitoring episode are also due quarterly. This schedule shall continue until further notice.

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

eva chu
Hazardous Materials Specialist

cc: Bart Miller, ESE, 4090 Nelson Ave, Suite J, Concord 94520
Broadway Volkswagen, 2740 Broadway, Oakland 94612
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0400

RAFAT A. SHAHID, Assistant Agency Director

StID 470

September 20, 1994

Mr. Bart Miller
ESE
4090 Nelson Ave, Suite J
Concord, CA 94520

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

RE: Workplan Approval for 2740 Broadway, Oakland 94612

Dear Mr. Miller:

I have completed review of ESE's August 1994 Workplan for Remedial Investigation for the above referenced site. The proposal to conduct a vapor extraction performance test and use the results of this investigation to prepare a remedial action plan is acceptable. Field work should commence within 45 days of the date of this letter, or by **November 7, 1994**. Please notify this office at least 72 hours prior to the start of field work.

Also, quarterly monitoring/sampling of wells MW-1, MW-3, and MW-7 should continue. Groundwater should be analyzed for TPH-G, BTEX, and HVOCS. If you have any questions, I can be reached at (510) 567-6762.

Sincerely,

eva chu
Hazardous Materials Specialist

cc: Tom Moffatt, Vorelco Inc, 3800 Hamlin Rd, Auburn Hills, MI
48326
Broadway Volkswagen, 2740 Broadway, Oakland 94612
files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0400

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 470

May 31, 1994

Mr. Tom Moffatt
Vorelco Inc
3800 Hamlin Rd
Auburn Hills, MI 48326

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

**Subject: Additional Investigations at Broadway Volkswagen,
2740 Broadway, Oakland, CA 94612**

Dear Mr. Moffatt:

I have completed review of Environmental Science & Engineering's (ESE) April 1994 Report of Site Activities at the above referenced site. This report documents the abandonment of three monitoring wells and the installation of additional monitoring wells, screened specifically over a perched, wet sand lens at approximately 13-17' depth.

In a recent conversation with Mr. Bart Miller of ESE, there is water in the vapor wells just installed. He proposes to pump the water into a Baker tank, and if this "perched" zone does not recharge, a vapor extraction performance test will be conducted. This proposal is acceptable and field work should commence **within 45 days of the date of this letter**. Please notify this office at least 72 hours prior to the start of field work.

Additional investigations will later be required to determine if the gasoline release from this site has impacted the lower, confined aquifer. A monitoring well should be installed downgradient from the former tank pit, and screened only in the confined aquifer. Groundwater should be analyzed for TPH-G and BTEX. This work may be performed after the vapor extraction test. This office will not require the cleanup of contamination which is from an offsite source.

If you have any questions, please contact Mr. Tom Peacock at the above number.

eva chu
Hazardous Materials Specialist

cc: Bart Miller, ESE, 4090 Nelson Ave, Suite J, Concord 94520
Broadway Volkswagen, 2740 Broadway, Oakland 94612
files (bdwyvw.1)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0400

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

September 23, 1993
STID# 470

Vorelco Inc.
ATTN: Tom Moffatt
3800 Hamlin Rd.
Auburn Hills, MI 48326

Re: 2740 Broadway, Oakland, CA 94612

Dear Tom Moffatt:

This office has received and reviewed the Report of Quarterly Activities, dated August 3, 1993 (with a cover dated September 3, 1993), for the above site by Environmental Science & Engineering, Inc. The recommendations on page 8 are acceptable with the following comments:

1. If you abandon 3 wells you also must realize that the current TPHg plume is not enclosed in the current downgradient direction. You need to explore the installation of an additional well in the westerly direction. This can be done at the time that the vadose wells are being installed.
2. You skipped monitoring for 9 months during the early part of this year. You need to get back on a quarterly schedule. This would give more information so that sound decisions can be made. The data you have especially for groundwater gradient has changed substantially, as an example, which could lead to very different conclusions. Quarterly monitoring helps to see seasonal variation over time.
3. Health based risk assessment to identify cleanup goals is an approach this Department is open to.

If you have any questions concerning this matter please contact this office.

Sincerely,

Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: Broadway Volkswagen, 2740 Broadway, Oakland, CA 94612
Edgar Howell, Chief - Files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RO# 400

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
STID# 470

Vorelco Inc.
ATTN: Tom Moffatt
3800 Hamlin Rd.
Auburn Hills, MI 48326

Re: 2740 Broadway, Oakland, CA 94612

Dear Tom Moffatt:

This office has received and reviewed the Report of Quarterly Activities, dated December 3, 1992, for the above site by Environmental Science & Engineering. The recommendations on page 12 are acceptable with the following comments:

1. The first recommendation has occurred in our meeting in December. This office conducted an investigation of the surrounding area and found a company that uses TCE. This may have been a source of TCE/DCE contamination which has been discovered in some of your wells. This company, across the street, does not have a well and has been apparently disposing of their waste properly for the last 2 years. Without additional investigation there is not enough information to draw conclusions about the source of this contamination or to make recommendations on how to prevent its further contamination of your site. This subject should be discussed in your next Report of Quarterly Activities.
2. You said that you wanted to close 3 of the wells. These wells may be allowing for cross contamination according to ESE. An additional round of sampling should be done to confirm this. Two of these wells are off-site. This is acceptable, provided you do further investigation to define the lateral and verticle extent of contamination.
3. You must continue to submit quarterly groundwater sampling reports to this office. The next report should be due now for sampling done in March 1993.
4. The city sewer line is incorrectly shown on your drawing. According to the city Public Works it begins about 100 ft. to the East and runs east, not towards Broadway as previously thought.
5. It is recommended that you continue a feasibility study to determine the best way to remediate the site. You have already been examining this option and you are encouraged to continue.

Vorelco Inc.
Broadway Volkswagen
STID 470
April 12, 1993
Page 2 of 2

If you have any questions concerning this matter please contact this office.

Sincerely,



Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: Lester Feldman, RWQCB
Broadway Volkswagen, 2740 Broadway, Oakland, CA 94612
Edgar Howell, Chief - Files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0400

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 1, 1992
STID# 470

Vorelco Inc.
ATTN: Tom Moffatt
P. O. Box 7050
Troy, MI 48007

Re: 2740 Broadway, Oakland, CA 94612


Dear Tom Moffatt:

This office has received and reviewed the Report of Quarterly Activities, dated November 12, 1991, for the above site by Environmental Science & Engineering. The recommendations on page 14 are acceptable with the following comments:

1. The installation of a vacuum system will probably remove a substantial amount of product in the vapor phase and other phases. No mass balance has been done so it is not known how much product is where. There is no reason to recover only "product" from the recovery well as any volatile substance will be removed by a vacuum system. This should be implemented as soon as possible.
2. This office has not received a quarterly report since the one above, with the last round of sampling being done in May 91, over 1 year ago. Quarterly monitoring results need to be submitted immediately.
3. Attached are Regional Board requirements for closure. This format should be followed so that reports include all necessary information.

If you have any questions concerning this matter please contact this office.

Sincerely,


Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: Lester Feldman, RWQCB
Broadway Volkswagen, 2740 Broadway, Oakland, CA 94612
Edgar Howell, Chief - Files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0400

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

September 14, 1992
STID# 470

Vorelco Inc.
ATTN: Tom Moffatt
888 W. Big Beaver Rd.
Troy, MI 48007

Re: 2740 Broadway, Oakland, CA 94612

Dear Tom Moffatt:

This office has received and reviewed the Report of Quarterly Activities, dated November 12, 1991, for the above site by Environmental Science & Engineering. The recommendations on page 14 are acceptable with the following comments:

1. The installation of a vacuum system will probably remove a substantial amount of product in the vapor phase and other phases. No mass balance has been done so it is not known how much product is where. There is no reason to recover only "product" from the recovery well as any volatile substance will be removed by a vacuum system. This should be implemented as soon as possible.
2. This office has not received a quarterly report since the one above, with the last round of sampling being done in May 91, over 1 year ago. Quarterly monitoring results need to be submitted immediately.
3. Attached are Regional Board requirements for closure. This format should be followed so that reports include all necessary information.

If you have any questions concerning this matter please contact this office.

Sincerely,

Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: Lester Feldman, RWQCB
Broadway Volkswagen, 2740 Broadway, Oakland, CA 94612
Edgar Howell, Chief - Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0400

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

October 1, 1991

Mr. Tom Moffatt
Construction Engineer
Vorleco Inc.
888 West Big Beaver Road
PO Box 7050
Troy, Michigan 48007-7050

Re: Site Remediation Broadway Volkswagen
2740 Broadway Ave., Oakland, CA 94612

Dear Mr. Moffatt:

Alameda County Environmental Health, Hazardous Materials Division is in receipt of the Report of Quarterly Activities for Broadway Volkswagen, dated July 10, 1991, prepared by Environmental Science and Engineering (ESE).

The Quarterly Monitoring Report outlines the completion of 5 soil borings and the installation of 1 monitoring well (mw-4). Soil contamination as high as 740 ppm of Total Volatile Hydrocarbons (TVH) as gasoline, and 1,200 ppb of benzene were detected. Water samples revealed contamination as high as 81,000 ppb TVH, 7,800 ppb benzene, 660 ppb trichloroethylene (TCE), and 380 ppb of dichloroethane (1,2 DCA).

We have also reviewed the latest Work Plan for Further Site Investigation, dated August 20, 1991, prepared by ESE.

The Work Plan proposes the destruction of an existing improperly abandoned monitoring well mw-2 through the necessary Alameda County Water District (Zone 7) permit process. The Work Plan also calls for the installation of 2 off site monitoring wells in the upgradient direction.

The proposal as specified is acceptable. You are requested to meet the following requirements:

- 1) When analyzing for volatile halocarbons you are requested to run analysis on one of the proposed off site wells using EPA method 8240. This method will detect additional halogenated and non halogenated volatile organic compounds which method 8010 is not able to detect. When re-sampling mw-4 you are also requested to use method 8240. If after comparing the mw-4 analytical results from the previous method 8010 analyses, no new compounds are detected, future halocarbon analyses may then be performed using method 8010.

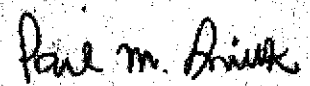
Mr. Tom Moffatt
October 1, 1991
page 2 of 2

2) You are requested to have ESE notify this Department at least 48 hours to the installation or removal of wells at the above site, this will permit a representative from this office (if possible) to witness the work being performed at the site.

Finally, a review of our records indicates that the balance of the deposit submitted with the initial underground tank removal closure submittal has been exhausted. Please submit to our office a check made payable to County of Alameda for \$500.00. This deposit is authorized by Section 3-141.6 of the Ordinance Code of the County of Alameda and is used to cover expenses incurred by Alameda County personnel in the discharge of their oversight duties associated with this project. Records are maintained of the time County employees commit to a project and the deposit is charged at an hourly rate of \$ 67.00 per hour. Upon the completion of the project the balance of the deposit will be returned to you.

If you have any questions regarding the content of this letter please contact me at (415) 271-4320.

Sincerely,



Paul M. Smith
Hazardous Materials Specialist

cc:

- Bart Miller/Susan Wickham, Environmental Science and Engineering
- Gil Jensen, Alameda County District Attorney's Office of Consumer and Environmental Protection
- Lester Feldman, RWQCB
- Emil Paul, General Manager, Broadway Volkswagen

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0400

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

August 16, 1991

ATTN: Tom Moffatt

Vorelco Inc.
888 W. Big Beaver
Troy, Mi 48007

RE: Project # 76B - M
at 2740 Broadway in Oakland 94612

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$500.00, payable to Alameda County.

Please write your project number and site address on your check.

We must receive this deposit before we perform any further work on this project. At the completion of this project, any unused monies will be refunded to you or your designee.

If you have any questions, please contact Paul Smith
at (415) 271-4320.

Sincerely,

Edgar B. Howell III, Chief
Hazardous Materials Division

EH:lp

cc: files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0400

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

August 1, 1991

Mr. Tom Moffatt
Construction Engineer
Vorleco Inc.
888 West Big Beaver Road
PO Box 7050
Troy, Michigan 48007-7050

Re: Site Remediation Broadway Volkswagen
2740 Broadway Ave., Oakland, CA 94612

Dear Mr. Moffatt:

Alameda County Environmental Health, Hazardous Materials Division has received and reviewed the Report of Quarterly Activities for Broadway Volkswagen dated July 10, 1991, prepared by Environmental Science and Engineering (ESE).

The Quarterly Monitoring Report outlines the completion of 5 soil borings and the installation of 1 monitoring well (mw-4). Soil contamination as high as 740 ppm of Total Volatile Hydrocarbons (TVH) as gasoline, and 1,200 ppb of benzene were detected. Water samples revealed contamination as high as 81,000 ppb TVH, 7,800 ppb benzene, 660 ppb trichloroethylene (TCE), and 380 ppb of dichloroethane (1,2 DCA).

The report recommends that two additional monitoring wells be installed upgradient from mw-3 in order to "identify contaminant sourcing beyond the subject facility". It also recommends an additional monitoring well and three to four hydropunch samples to be located in the down gradient direction from mw-4, in order to determine the extent of product migration. The destruction of mw-2 under authorization from Alameda County Zone 7 is also recommended.

We concur with these recommendations. The following items need to be incorporated into the next work plan which should address the following activities :

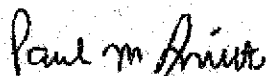
- 1) The locations of proposed borings, probes and monitoring well construction.
- 2) The types of chemical analyses which will be conducted for the above and the frequency of well monitoring.
- 3) A projected time line for the completion of the investigative phase of all contaminants and for the implementation of a remediation system which will effectively mitigate the contamination at the above site.

Mr. Tom Moffatt
August 1, 1991
page 2 of 2

You are requested to submit a work plan which should include but should not be limited to the above requested information in order to adequately delineate the nature and extent of contamination at the above site within 45 days of the receipt of this letter.

If you have any questions, please contact me at (415) 271-4320.

Sincerely,



Paul M. Smith
Hazardous Materials Specialist

cc:

Bart Miller/Susan Wickham, Environmental Science and Engineering
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Protection
Lester Feldman, RWQCB
Emil Paul, General Manager, Broadway Volkswagen

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0400

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

May 6, 1991

Mr. Tom Moffatt
Construction Engineer
Vorleco Inc.
888 West Big Beaver Road
PO Box 7050
Troy, Michigan 48007-7050

**Re: Site Remediation Broadway Volkswagen
2740 Broadway Ave., Oakland, CA 94612**

Dear Mr. Moffatt:

Alameda County Environmental Health, Hazardous Materials Division has received and reviewed the Workplan for Site Assessment for the above site. The plan calls for the installation of 4 soil borings to delimit the extent of subsurface contamination, the installation of and additional groundwater monitoring well and the re-initiation of quarterly monitoring reports.

The workplan as proposed is hereby approved however additional investigatory work is necessary in order to adequately delineate contamination both onsite and offsite.

In order to properly define the extent of the contamination which may extend offsite you are requested to submit an additional workplan which will define the nature and extent of the contamination to soil and groundwater which appears to be associated with monitoring well three. When taking groundwater samples from each of the wells you are requested to analyze samples for the presence of Chlorinated Solvents utilizing EPA method 601 or 624. You are also requested to analyze one soil sample taken from one of the 2 borings done at each of the former tank excavation areas for the 5 ICAP metals (Cd, Cr, Pb, Ni, & Zn), and for Chlorinated Solvents using method 8010 or 8240.

Mr. Tom Moffatt
May 6, 1991
page 2 of 2

You are requested to submit an additional workplan specifying proposed activity to adequately delineate the nature and extent of contamination at the above site.

If you have any questions, please contact me at (415) 271-4320.

Sincerely,

Paul M. Smith

Paul M. Smith
Hazardous Materials Specialist

cc:

Susan Wickham, Environmental Science and Engineering
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Protection
Howard Hatayama, DHS
Lester Feldman, RWQCB
Emil Paul, General Manager, Broadway Volkswagen

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0400

Certified Mailer # P 062 128 304

December 10, 1990

Mr. Tom Moffatt
Construction Engineer
Vorleco Inc.
888 West Big Beaver Road
PO Box 7050
Troy, Michigan 48007-7050

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

**RE: The Proposal for Site Assessment for Broadway Volkswagen
2740 Broadway Ave., Oakland, CA 94612**

Dear Mr. Moffatt:

We are in receipt of the proposal for site Assessment for the above site dated November 14, 1990 by the Environmental Science and Engineering Inc. (ESE). The plan proposes three phases of work. These include:

Phase I- To examine and evaluate all existing data pertaining to historic and remedial information at this site. A records search of properties within a specified proximity to the above facility, to obtain information on hazardous materials storage or releases, and hydrogeology

Phase II- Will develop a specific workplan based upon the findings of Phase I. The workplan will propose soil borings, excavation (if necessary) and additional ground water monitoring wells to delineate the extent of soil and water contamination. The proposed Report/Workplan will be submitted to Alameda County Health Dept. for review prior to implementation.

Phase III- Will install three additional groundwater monitoring wells at the site, and implement Quarterly monitoring of these wells and the three existing wells at the site, for 4 quarters. Ground water monitoring data collected will contain elevation measurements, and analytical data for TPH and BTEX,

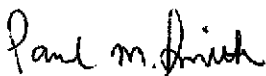
Mr. Moffatt
December 10, 1990
Page 2 of 2

The three phased approach, briefly mentioned above, recommended by your consultant (ES&E) sounds like a reasonable next step approach in appraising the extent of contamination at this site. I shall await a workplan describing the specifics of borings, wells, further excavation (if necessary), previous soil disposal, monitoring and analytical sampling. You are requested to provide the workplan to both this office and the Regional Water Board within 60 days of the receipt of this letter. Reports to the Regional Board should be addressed to:

Lester Feldman
San Francisco Regional Water Quality Control Board
1800 Harrison Street, Suite 700
Oakland, CA 94612

If you have any questions, please contact me at (415) 271-4320.

Sincerely,



Paul M. Smith
Hazardous Materials Specialist

cc:

Susan Wickham, Environmental Science and Engineering Inc.
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Protection
Howard Hatayama, DHS
Lester Feldman, RWQCB
Emil Paul, General Manager, Broadway Volkswagen

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0400

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

October 22, 1990

Mr. Tom Moffatt
Construction Engineer
Vorleco Inc.
888 West Big Beaver Road
PO Box 7050
Troy, Michigan 48007-7050

**RE: Site Remediation Broadway Volkswagen
2740 Broadway Ave., Oakland, CA 94612**

Dear Mr. Moffatt:

This letter is in response to the underground tank removal report dated February, 1989 and deposit which was recently received by this office. This report combined with information in reports dated February 10, 1989 and March 14, 1989 from Hunter Environmental Services constitutes the sum total of information currently available at this office in dealing with the tank removals and contamination at the above site. We also received a recent letter dated September 10, 1990 to you by Susan Wickham with Environmental Science & Engineering (ESI) formerly Hunter/Gregg.

Based on the above reports the following concerns need to be addressed with respect to the remediation of the above site:

Did over excavation occur following the initial soil contamination during any of the tank removals?

What became of the stockpiled soils from each tank excavation?

Based on the conclusions of the January 89' report the vertical and lateral extent of soil contamination in the tank excavations has not been completely delineated. Soil contamination levels of 840 ppm Total Petroleum Hydrocarbon (TPH) and 2400 ppm Oil and Grease (O&G) surrounding tank B, and 2900 ppm TPH 1200 ppm O&G surrounding the soil of tank D were detected. You are requested to submit a proposal to address the chosen method for the delineation of contaminated soils surrounding the tank excavation and a plan to deal with the contamination once the assessment is complete.

Groundwater monitoring wells identified benzene levels of 53 ppb in monitoring well 1 and 9600 ppb in monitoring well 3. You are requested to initiate quarterly monitoring of each of the established wells. Quarterly monitoring reports must include

Mr. Tom Moffatt
October 22, 1990
Page 2 of 2

depth to groundwater data in order to establish hydraulic gradient and chemical analysis for Benzene, Toluene, Ethylbenzene, and Xylene (BTEX), (TPH), and heavy metals (Cd, Cr, Pb, Ni, Zn) by either ICAP or AA. All laboratory analysis must be performed by a CA certified lab. You are requested to submit a proposal to identify the extent of water contamination and a plan to remediate the contamination at this site.

Please respond to the above requests for information within 30 days of the receipt of this letter.

If you have any questions, please contact me at (415) 271-4320.

Sincerely,

Paul M. Smith
Hazardous Materials Specialist

cc:

Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Protection
Howard Hatayama, DHS
Lester Feldman, RWQCB
Emil Paul, General Manager, Broadway Volkswagen

LS

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0400

September 19, 1990

David Browning
Broadway Volkswagen
2740 Broadway
Oakland, CA 94612

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

Re: Waste Minimization Assessment

Dear David Browning:

Your business has been selected to receive a hazardous waste minimization assessment. As you are probably aware, hazardous waste reduction has become a statewide, if not a national, issue. To address this issue at a county level, Alameda County is establishing its own Hazardous Waste Minimization Program and is planning to conduct waste minimization assessments for all hazardous waste generating facilities in the County.

We have chosen businesses in the auto repair industry to receive the first round of waste minimization assessments. It is our hope that these assessments will assist participating businesses in minimizing their hazardous wastes - and will give us further information on the best way to structure our minimization program.

One of our Hazardous Materials Specialists will be contacting you during the week of September 24 to arrange a meeting with you for an assessment of your business. During this meeting and assessment, the Specialist will work with you in examining your business's hazardous waste generating practices. The Specialist will then provide you with materials on waste reduction technology and assist you in setting up appropriate hazardous waste minimization practices.

We look forward to working with you in reducing the amount of hazardous waste your business generates. Of course, your comments and suggestions are encouraged; we need your input in order to best serve you! Please direct any comments and questions to Katherine Chesick at 415/271-4320.

Sincerely,

Edgar B. Howell, Chief,
Alameda County Hazardous Materials Division

EBH:kac

cc: Fire Department
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0400

July 25, 1990

Mr. W. H. Devine
General Manager
Vorleco Inc.
888 West Big Beaver Road
Troy, Michigan 48007-7050

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

**RE: Remediation, Deposit/Refund at Broadway Volkswagen
2740 Broadway, Oakland, CA 94612**

Dear Mr. Devine,

This letter is in regard to the need for information pertaining to the remediation effort at Broadway Volkswagen Dealership located at the above address. A report produced by Hunter Environmental Services dated February 10, 1989 identified contamination levels in two of the three monitoring wells installed onsite. Since that date no records or additional monitoring data have been received addressing this contamination.

The following concerns need to be addressed in order to adequately define the contamination at this site:

- 1) Submit/resubmit all available reports and data collected with regard to the underground tanks which were removed at the above site.
- 2) Submit copies of manifests for the underground storage tanks and any soil which was removed from this site.
- 3) A review of the records indicates that the balance of the deposit submitted in regards to the underground storage tank removal conducted at the above location is nearly depleted and therefore insufficient to cover remaining costs anticipated for this project. Please submit to our office a check made payable to the county of Alameda for \$ 500.00.

This deposit is authorized by Section 3-141.6 of the Ordinance Code of the County of Alameda and is used to cover expenses incurred by Alameda County personnel in the discharge of their oversight duties associated with this project. The deposit is charged at an hourly rate. Upon completion of the project the unused portion of the balance will be returned to you.

Mr. W.H. Devine
Vorleco Inc.
July 25, 1990
Page 2 of 2

You are requested to submit the above information to this office within 30 days of the receipt of this letter or by August 30, 1990.

If you have any questions, please contact me at (415) 271-4320.

Sincerely,

Paul M. Smith

Paul M. Smith
Hazardous Materials Specialist

cc:

Gil Jensen, Alameda County District Attorney's Office of Consumer
and Environmental Protection
Howard Hatayama, DHS
Lester Feldman, RWQCB
John Northington, Broadway Volkswagen

ALAMEDA COUNTY
HEALTH CARE SERVICES

DAVID J. KEARS, AGENCY
~~CAROL K. WESTER~~ Agency Director



Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

R0400

AGENCY HEADQUARTERS
~~XXXXXXXXXXXX~~
~~XXXXXXXXXXXX~~
(415) 271-4320

December 30, 1988

Ms. Susan S. Wickham
Hunter Environmental Services, Inc.
597 Center Ave. Suite 350
Martinez, CA 94553

Re: Broadway Volkswagen
2740 Broadway
Oakland, CA 94612

Dear Ms. Susan K. Wickham:

This letter is in response to your plan for monitoring well installation at the above site. The plan is acceptable given the constraints of the site and the location of the building. Well sample analysis may indicate that contamination has migrated down gradient where you presently do not have any well sites. It may be necessary in the future to construct additional wells down gradient from the tanks which leaked.

This office has not received the Underground Storage Tank Unauthorized Release (Leak)/Contamination Site Report as required within 5 days. A blank copy of the form is attached for your submission.

Please contact this office when the well installation will occur. Please submit sample results to this office for ground water samples taken and analyzed.

Also, note that there was an additional tank discovered next to and west of tank site #1 which was not shown on your drawing.

If you have any other questions, please contact Thomas Peacock, Sr. Hazardous Material Specialist, at (415) 271-4320.

Sincerely,

Rafat A. Shahid
Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:tfp

cc: Lisa McCann, RWQCB
Broadway Volkswagen