

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
06-01-07

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

May 29, 2006

Mr. Mohammad Pazdel  
1770 Pistacia Court  
Fairfield, CA 94533

Mr. Hamid Khatri  
c/o Mr. Michael D. Liberty  
3713 Century Drive  
Campbell, CA 95008-3832

Subject: Fuel Leak Case No. RO0000473, Arco Service Station, 15101 Freedom Avenue, San Leandro, CA

Dear Mr Pazdel:

Alameda County Environmental Health Department (ACEH) staff has reviewed the case file and work plan entitled, "Work Plan to Conduct an Additional Soil and Groundwater Investigation at The Texaco Gasoline Service Station", dated December 2005 and prepared on your behalf by SOMA Environmental Engineering, Inc. The work plan was submitted in response to a request by ACEH dated November 2005. ACEH agrees with the need for additional investigation to characterize the contaminant plume and the potential plume migration issues beneath nearby residences. Furthermore, we recommend the implementation interim remedial measures combined with a Corrective Action Plan to mitigate off site contamination plume migration. Lastly, ACEH recommends the preparation of a Site Conceptual Model (SCM) to summarize the site background, history, geology, hydrogeology, and investigation results to date for the site. The SCM also presents conclusions and recommendations for future actions.

Based on ACEH staff review of the documents referenced above, we request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to [steven.plunkett@acgov.org](mailto:steven.plunkett@acgov.org)) prior to the start of field activities.

**TECHNICAL COMMENTS**

1. **Soil and Groundwater Contamination.** Currently, petroleum hydrocarbons have been detected in groundwater both on site and off site at concentrations ranging from 43,500 µg/L TPHg, 3,630 µg/L benzene, 1,440 µg/L MtBE, 902 µg/L TBA and 277 µg/L TAME. The above referenced report proposes an additional investigation including the installation of eight soil borings to refine on site and off site hydrogeologic conditions and soil and groundwater contamination, installation of one hollow stem auger boring as a calibration for CPT borings and conducting a MIP investigation to define the vertical and horizontal extent of on site and off site soil and groundwater contamination. However, no data has been collected below 30 feet bgs to determine the vertical extent of soil and groundwater contamination on site.

Please use the CPT/MIP data to target sediments below first-encountered groundwater for proposed depth-discrete soil and groundwater sampling.

- 2. Plume Geometry and Proposed Soil Boring Locations.** ACEH recommends the installation of five on site soil borings, not six as originally proposed by SOMA (see figure 1 for approximate location of all proposed soil borings). Petroleum hydrocarbon contamination has been detected in soil in boring TWB-1 at maximum concentrations of 4,000 mg/kg TPHg, which is in very close proximity to newly proposed soil borings CPT-7 and monitoring well MW-6. Given off site soil and groundwater conditions, combined with the lack of data in the area and the distance -approximately 120 feet- between proposed soil boring CPT-5 and CPT-7, ACEH recommends that soil borings CPT-6 and CPT-7 remain, but the position of the boring be adjusted to help delineate plume geometry. See Figure 1 for approximate locations of soil borings CPT-6, CPT-7 and CPT-8. Additionally, ACEH requests that you define the lateral extent of the contamination plume off site; therefore, ACEH suggests the proposed location of CPT-8 be adjusted to help define the lateral extent of soil and groundwater contamination offsite. See figure 1 for proposed location of soil borings.

ACEH understands that during field investigations conditions may arise that could impact the proposed soil boring locations, and professional judgment must be used if a condition arises requiring the relocation of the proposed soil borings. Additionally, ACEH understands the concerns pertaining to underground utilities; therefore, we suggest either hand-auger or air knife to clear the borings of subsurface utilities. Either of these methods should minimize concerns regarding the installation of CPT boring as originally located.

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All soil and groundwater samples are to be analyzed for total petroleum hydrocarbons as gasoline (TPHg), benzene, toluene, ethylbenzene, and xylenes (BTEX), and fuel oxygenates MTBE, Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), Tertiary Butyl Alcohol (TBA), and Ethanol by EPA Method 8260 and the lead scavengers, Ethylene Dibromide (EDB), Ethylene Dichloride (EDC) and TPH as diesel (TPHd) using EPA method 8015M. If any of the latter compounds are detected, and are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan. Results from the soil and groundwater investigation are to be presented in the Soil and Groundwater Investigation Report requested below.

4. **Alternatives for Interim Remediation and Control of Groundwater Contaminant Plume Migration.** The goal of plume migration control is to stop plume migration, prevent nuisance conditions, and protect potential receptors such as water supply wells. Interim remediation is necessary to reduce the ultimate impact of the unauthorized release by limiting continued growth and migration of the contaminant plume, and reduce overall cleanup costs. We request that interim remediation be performed following contaminant source characterization. Specifically, the effects of high concentrations of TPHg and other additives and oxygenates on the aerobic degradation of MTBE should be evaluated. Appropriately located and constructed groundwater monitoring wells should be used to monitor and evaluate the effectiveness of remediation within the plume. The results of the off-site subsurface investigation should be used to evaluate the need for migration control. Please include an evaluation of the need for and feasibility of migration control in the Soil and Groundwater Investigation Report requested below
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6. **Project Approach and Investigation Reporting – Site Conceptual Model**

We anticipate that characterization and remediation work in addition to what is requested in this letter will be necessary at and downgradient from your site. Considerable cost savings can be realized if your consultant focuses on developing and refining a viable Site Conceptual Model (SCM) for the project. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point, the SCM is said to be "validated." The validated SCM then forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

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**specific supplemental tasks for future investigations.** There may need to be additional phases of investigations, each building on the results of the prior work, to validate the SCM. Characterizing the site in this way will improve the efficiency of the work and limit its overall cost.

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- b) A concise discussion of the on-site and off-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to downgradient and above-ground receptors. Be sure to include the vapor pathway in your analysis. Maximize the use of large-scale graphics (e.g., maps, cross-sections, contour maps, etc.) and conceptual diagrams to illustrate key points. Include structural contour maps (top of unit) and isopach maps to describe the geology at your site. Geologic cross-sections, which include an interpretive drawing of the vertical extent of soil and groundwater contamination (i.e., an interpretive drawing—not a plot of laboratory results). The SCM report requested below is to include one cross section parallel and one cross section perpendicular to the contaminant plume axis. Each cross section should include, but not be restricted to, the following:
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- f) Temporal changes in the plume location and concentrations are also a key element of the SCM. In addition to providing a measure of the magnitude of the problem, these data are often useful to confirm details of the flow system inferred from the hydraulic head measurements. Include plots of the contaminant plumes on your maps, cross-sections, and diagrams.
- g) Several other contaminant release sites exist in the vicinity of your site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for your SCM. Include a summary of work and technical findings from nearby release sites and incorporate the findings from nearby site investigations into your SCM.
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Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](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.

Mr. Mohammad Pazdel  
April 25, 2006  
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If you have any questions, please call me at (510) 383-1767.

Sincerely,



Steven Plunkett  
Hazardous Materials Specialist

cc: Mr. Monsour Sepehr  
SOMA Environmental Engineering, Inc.  
6620 Owens Drive, Suite A  
Pleasanton, CA 94588-3334

Donna Drogos, ACEH  
Steven Plunkett, ACEH  
File

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#### **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.

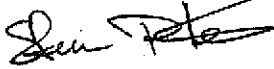
#### **AGENCY OVERSIGHT**

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. Mohammad Pazdel  
April 25, 2006  
Page 7

If you have any questions, please call me at (510) 383-1767.

Sincerely,



Steven Plunkett  
Hazardous Materials Specialist

cc: Mr. Monsour Sepehr  
SOMA Environmental Engineering, Inc.  
6620 Owens Drive, Suite A  
Pleasanton, CA 94588-3334

Donna Drogos, ACEH  
Steven Plunkett, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



505/03-2006

March 16, 2006

Mohammad & Elaine Pazdell  
1770 Pistacia Ct.  
Fairfield, CA 94533-8831

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

Dear Mr. & Mrs. Pazdell:

Subject: Fuel Leak Case No. RO0000473, Arco, 15101 Freedom Avenue,  
San Leandro, CA

Alameda County Environmental Health (ACEH) staff has reviewed "Work Plan to Conduct an Additional Soil and Water Investigation" dated December 28, 2005 and "Addendum to Work Plan" dated March 3, 2006, both prepared by SOMA Environmental Engineering, Inc. (SOMA). The Work Plan and Addendum which proposes conducting a cone penetrometer test (CPT)/membrane interface probe (MIP) study to evaluate the site's hydrogeology and extent of soil and groundwater contamination is approved provided the following technical comments are addressed. We request that you address the following technical comments, perform the proposed work, and send us the reports requested below.

TECHNICAL COMMENTS

- 1) Analyses – We request that you include the other fuel oxygenates Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), and Tertiary Butyl Alcohol (TBA), Ethanol by EPA Method 8260 and the lead scavengers, Ethylene Dibromide (EDB), Ethylene Dichloride (EDC) for analyses of groundwater samples, and for the lead scavengers, EDB and EDC, also perform analyses on soil samples. If any of the latter compounds are detected, and are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan.
- 2) Onsite benzene soil concentrations exceed Environmental Screening Levels (ESLs) - RWQCB-SFBR's ESLs for vapor intrusion concerns for benzene is 0.18 milligrams/kilogram (mg/kg) for residential exposure or 0.51 mg/kg for commercial/industrial exposure. Up to 20 mg/kg benzene was detected (at 12.5 feet below ground surface (bgs) collected May 1999). Please submit a Work Plan for onsite source remediation after the site has been characterized.

TECHNICAL REPORT REQUEST

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

- May 16, 2006 - Soil and Water Investigation Report

- April 30, 2006 – 1<sup>st</sup> Quarter 2006 Groundwater Monitoring Report
- July 31, 2006 – 2<sup>nd</sup> Quarter 2006 Groundwater Monitoring Report
- October 31, 2006 - 3<sup>rd</sup> Quarter 2006 Groundwater Monitoring Report
- January 31, 2007 - 4<sup>th</sup> Quarter 2006 Groundwater Monitoring Report

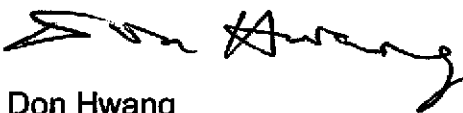
These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance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

### ELECTRONIC SUBMITTAL OF REPORTS

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

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

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

Enclosure

C: Mansour Sepehr, SOMA Environmental Engineering, Inc., 6620 Owens Drive, Suite A, Pleasanton, CA 94588  
Donna Drogos  
File



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

November 21, 2005

Mohammad & Elaine Pazdell  
1770 Pistacia Ct.  
Fairfield, CA 94533-8831

Dear Mr. & Mrs. Pazdell:

Subject: Fuel Leak Case No. ROOOO473, Arco, 15101 Freedom Avenue, San Leandro, CA

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including "Third Quarter 2005 Groundwater Monitoring Report" dated September 28, 2005, prepared by SOMA Environmental Engineering, Inc. (SOMA). Up to 43,500 micrograms/liter (ug/l) Total Petroleum Hydrocarbons-Gasoline (TPH-G) and up to 3,630 ug/l benzene were detected onsite. Offsite groundwater monitoring wells detected up to 6,130 ug/l TPH-G and up to 99 ug/l benzene. We request that you address the following technical comments, perform the proposed work, and send us the reports requested below.

TECHNICAL COMMENTS

1) Onsite benzene soil concentrations exceed Environmental Screening Levels (ESLs) - RWQCB-SFBR's ESLs for vapor intrusion concerns for benzene is 0.18 milligrams/kilogram (mg/kg) for residential exposure or 0.51 mg/kg for commercial/industrial exposure. Up to 20 mg/kg benzene was detected (at 12.5 feet below ground surface (bgs) collected May 1999). Please submit a Work Plan for onsite source remediation.

2) The dissolved contaminant plume may be underneath residential areas - The site is adjacent to and is located near other residential areas. The likelihood that the dissolved contaminant plume may have migrated underneath nearby residential areas and if so, whether ESLs for residential exposure may be exceeded needs to be evaluated. Cross-sections are to be constructed to use to determine if the dissolved contaminant plume may have migrated underneath nearby residential areas. The cross-sections are to illustrate the lateral and vertical extent of soil layers, where groundwater was first encountered in borings and the static water levels, observations of free product, staining, and odor, and soil and groundwater sample locations and their concentrations. In the Work Plan, please include a proposal to construct cross-sections to determine if the dissolved contaminant plume may have migrated underneath nearby residential areas.

3) Source Characterization - Up to 4,000 mg/kg TPH-G and 12 mg/kg benzene were detected in the deepest soil sample collected beneath the underground fuel storage tanks at 24.5 feet below ground surface (bgs). Thus, the source area has not been vertically delineated. We request that you propose additional borings to delineate the vertical extent of soil contamination in the source area in the Work Plan requested below.

4) Historical hydraulic gradients - Please show using a rose diagram with magnitude and direction; include cumulative groundwater gradients in all future reports submitted for this site.

5) Recommendation to conduct a slug test to design a groundwater extraction system - Not approved at this time.

6) Recommendation to inject Fenton's reagent into well MW-3 - Not approved at this time.

7) Recommendation to conduct a natural attenuation study during quarterly monitoring events - Not approved at this time.

#### TECHNICAL REPORT REQUEST

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

- January 21, 2006 - Work Plan for Soil and Water Investigation
- January 31, 2006 - 4<sup>th</sup> Quarter 2005 Groundwater Monitoring Report
- 60 days after Work Plan approval - Soil and Water Investigation Report
- April 30, 2006 - 1<sup>st</sup> Quarter 2006 Groundwater Monitoring Report
- July 31, 2006 - 2<sup>nd</sup> Quarter 2006 Groundwater Monitoring Report
- October 31, 2006 - 3<sup>rd</sup> Quarter 2006 Groundwater Monitoring Report

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

#### ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic

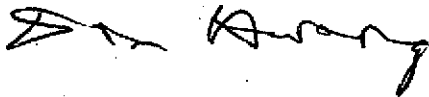
submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from USTs have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](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.

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

Sincerely,



Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Mansour Sepehr, SOMA Environmental Engineering, Inc., 6620 Owens Drive, Suite A, Pleasanton, CA 94588  
Donna Drogos  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES



SENT  
11-8-05

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

November 7, 2005

Mohammad & Elaine Pazdell  
1770 Pistacia Ct.  
Fairfield, CA 94533-8831

Dear Mr. & Mrs. Pazdell:

Subject: Fuel Leak Case No. R0000473, Arco, 15101 Freedom Avenue, San Leandro, CA

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including "First Quarter 2005 Groundwater Monitoring Report" dated April 1, 2005, prepared by SOMA Environmental Engineering, Inc. (SOMA). Up to 42,600 micrograms/liter (ug/l) Total Petroleum Hydrocarbons-Gasoline (TPH-G) and up to 3,040 ug/l benzene were detected onsite. Offsite groundwater monitoring wells detected up to 6,040 ug/l TPH-G and up to 125 ug/l benzene. MW-8 was not sampled. We do not concur with SOMA's recommendation for a risk based corrective action plan (RBCA). We request that you address the following technical comments, perform the proposed work, and send us the reports requested below.

TECHNICAL COMMENTS

- 1) Source Characterization - Up to 4,000 milligrams/kilogram (mg/kg) TPH-G and 12 mg/kg benzene were detected in the deepest soil sample collected beneath the underground fuel storage tanks at 24.5 feet below ground surface (bgs). Thus, the source area has not been vertically delineated. We request that you propose additional borings to delineate the vertical extent of soil contamination in the source area in the Work Plan requested below.
- 2) Historical hydraulic gradients - Please show using a rose diagram with magnitude and direction; include cumulative groundwater gradients in all future reports submitted for this site.

TECHNICAL REPORT REQUEST

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

- January 7, 2006 - Work Plan for Soil and Water Investigation
- January 31, 2006 - 4<sup>th</sup> Quarter 2005 Groundwater Monitoring Report
- 60 days after Work Plan approval - Soil and Water Investigation Report
- April 30, 2006 - 1<sup>st</sup> Quarter 2006 Groundwater Monitoring Report

- July 31, 2006 – 2<sup>nd</sup> Quarter 2006 Groundwater Monitoring Report
- October 31, 2006 - 3<sup>rd</sup> Quarter 2006 Groundwater Monitoring Report

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

### ELECTRONIC SUBMITTAL OF REPORTS

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

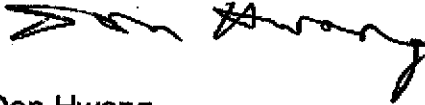
### PERJURY STATEMENT

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.

Mr. & Mrs. Pazdell  
November 7, 2005  
Page 3

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

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hwang", with a stylized flourish at the end.

Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: Mansour Sepehr, SOMA Environmental Engineering, Inc., 2680 Bishop  
Drive, Suite 203, San Ramon, CA 94583  
Donna Drogos  
File

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

RO0000473

February 4, 2004

Mr. Mohammed Pazdel  
35840 Alcazar Court  
Fremont, CA 94536

RE: Work plan Approval for the Former Freedom ARCO Station, 15101 Freedom Ave, San Leandro, CA

Dear Mr. Pazdel:

I have completed review of Soma Environmental Engineering, Inc's (Soma) January 20, 2004 *Workplan to Install Off-Site Monitoring Wells* report prepared for the above referenced site. Soma's proposal to install four groundwater monitoring wells within the first water bearing zone (to a depth of 30 feet bgs) is acceptable. Be advised that well screens should be kept short, no longer than 5 feet in length.

The workplan should be implemented with 90 days of the date of this letter, or by **May 10, 2004**. If you have any questions, I can be reached at (510) 567-6762 or by email at [echu@co.alameda.ca.us](mailto:echu@co.alameda.ca.us).

eva chu  
Hazardous Materials Specialist

c: Donna Drogos  
email: Mansour Sepehr, Soma

freedomARCO-5



SENT  
02-05-04

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

**RO0000437**

February 4, 2004

Ms. Mary Grace Houlihan  
Signature Properties  
4670 Willow Road, Suite 200  
Pleasanton, CA 94588


**Subject: Fuel Leak Case #RO0000437, Glascock Ave Warehouse, 2901 Glascock Ave,  
Oakland, CA 94601**

Dear Ms. Houlihan:

I am in receipt of your email dated February 3<sup>rd</sup>, 2004. Per my discussion with Peter Langtry of Lowney & Associates, Alameda County Environmental Health (ACEH) office is reviewing all the reports and conferring with the Regional Water Quality Control Board (RWQCB). ACEH will issue a response as soon as our review processes are completed.

If you have any questions, please call me at 510-567-6876.

Sincerely,

  
Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Peter Langtry, Lowney Associates, 167 Filbert Street, Oakland, CA 94607  
D. Drogos, A. Gholami



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



11-13-03

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 397-9335

RO0000473

November 12, 2003

Mr. Mohammed Pazdel  
35840 Alcazar Court  
Fremont, CA 94536

**RE: Former Freedom ARCO Station, 15101 Freedom Ave, San Leandro, CA**

Dear Mr. Pazdel:

I have completed review of SOMA's November 2003 *Off-Site Soil & Groundwater Investigation* report prepared for the above referenced site. This report summarized the results of the advancement of six temporary well boreholes to delineate the lateral and horizontal extent of the contaminant plume emanating from the referenced site. Soil and water samples collected from the investigation confirmed that the petroleum hydrocarbon plume has migrated off-site at least 300 feet. Free product was noted in borehole TWB-1.

SOMA recommended that off-site groundwater monitoring wells be installed. And that the two downgradient water supply wells in close proximity to the site be sampled, and their construction details evaluated. I concur with SOMA's recommendations. A work plan for the installation of at least two offsite wells (one near TWB-1, another about 100 feet south of TWB-1) should be prepared and submitted to this office for review within 45 days of the date of this letter, or by December 31, 2003.

If you have any questions, I can be reached at (510) 567-6762 or by email at [echu@co.alameda.ca.us](mailto:echu@co.alameda.ca.us)

eva chu  
Hazardous Materials Specialist

c: Mansour Sepehr, Soma, 2680 Bishop Dr, Ste 203, San Ramon, CA 94583  
Hamid Khatirine, 3713 Century Dr, Campbell, CA 95008-3832  
Donna Drogos

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



09-02-03

RO0000473

August 29, 2003

Mr. Mohammed Pazdel  
35840 Alcazar Court  
Fremont, CA 94536

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

RE: Former Freedom ARCO Station, 15101 Freedom Ave, San Leandro, CA

Dear Mr. Pazdel:

I have completed review of SOMA's August 26, 2003 fax package. SOMA will drill boreholes to a minimum depth of 40 feet bgs; each borehole will be continuously logged beginning at approximately 25 feet bgs to the bottom of the borehole; select soil samples will be submitted to a laboratory for chemical analysis; and an additional borehole, TWB-6, has been added to the investigation. The proposed changes are acceptable. Field work should commence within 45 days of the date of this letter, or by October 24, 2003. Please provide at least 72 hours advance notice of field activities.

If you have any questions, I can be reached at (510) 567-6762 or by email at [echu@co.alameda.ca.us](mailto:echu@co.alameda.ca.us)

eva chu  
Hazardous Materials Specialist

email: Mansour Sepehr, Soma, 2680 Bishop Dr, Ste 203, San Ramon, CA 94583

c: Hamid Khatirine, 3713 Century Dr, Campbell, CA 95008-3832  
Donna Drogos

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



8-21-03  
ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

RO0000473

August 20, 2003

Mr. Mohammed Pazdel  
35840 Alcazar Court  
Fremont, CA 94536

RE: Former Freedom ARCO Station, 15101 Freedom Ave, San Leandro, CA

Dear Mr. Pazdel:

I have completed review of SOMA's July 22, 2003 *Workplan to Conduct Off-Site Soil and Groundwater Investigation* report prepared for the above referenced site. SOMA proposed to drill five temporary well boreholes to evaluate the extent of groundwater contamination. Below are my comments:

- The boreholes should be advanced beyond 30 feet bgs (to at least 40 feet bgs) to determine the vertical extent (to non-detect levels) of contamination.
- Soil samples should be collected, beginning from the capillary fringe to the bottom of the borehole, for field screening (lithologic changes and hydrocarbon contamination). Select soil samples should be submitted to a laboratory for chemical analysis.
- An additional borehole is recommended between TWB-1 and TWB-4 to better assess groundwater contamination beneath the residential area.
- Data from the above investigation will determine the best locations for permanent groundwater monitoring wells. Be advised that well screen intervals must not exceed 5 feet in length; thus, multiple screen intervals may be required for permanent wells.

In a recent conversation with Roger Paplar of SOMA, it appears that the geologic logs this office is in receipt of (for the onsite groundwater monitoring wells) may be inaccurate. Please submit copies of the master bore logs.

If you have any questions, I can be reached at (510) 567-6762 or by email at [echu@co.alameda.ca.us](mailto:echu@co.alameda.ca.us)

eva chu  
Hazardous Materials Specialist

c: Mansour Sepehr, Soma, 2680 Bishop Dr, Ste 203, San Ramon, CA 94583  
Hamid Khatirine, 3713 Century Dr, Campbell, CA 95008-3832  
Donna Drogos

freedomARCO-2

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



05-16-03

RO0000473

May 16, 2003

Mr. Mohammed Pazdel  
35840 Alcazar Court  
Fremont, CA 94536

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

RE: Former Freedom ARCO Station, 15101 Freedom Ave, San Leandro, CA

Dear Mr. Pazdel:

I have completed review of the case file for the above referenced site. Fuel release from the former underground storage tanks has impacted groundwater beneath the site. Data collected from onsite groundwater monitoring wells suggest that the plume has migrated offsite.

At this time, additional investigations are required to delineate the extent of the contaminant plume. You should have a water well survey and preferential pathway survey prepared for the site. Information from the survey should be incorporated into a report with geologic cross-sections and work plan for offsite investigation that will delineate the vertical and horizontal extent of the contaminant plume. The geologic cross-sections should include, at a minimum, groundwater monitoring wells and screen intervals, sewer trenches, soil contamination concentration, and groundwater elevation.

The well and conduit survey should be completed within 45 days of the date of this letter and a work plan for an offsite investigation completed by **August 4, 2003**.

If you have any questions, I can be reached at (510) 567-6762 or by email at [echu@co.alameda.ca.us](mailto:echu@co.alameda.ca.us)

eva chu  
Hazardous Materials Specialist

c: Mansour Sepehr, Soma, 2680 Bishop Dr, Ste 203, San Ramon, CA 94583  
Hamid Khatirine, 3713 Century Dr, Campbell, CA 95008-3832  
Donna Drogos

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



07-08-02

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

July 2, 2002

RO0000473

Mr. Mohammed Pazdel  
35840 Alcazar Court  
Fremont, CA 94536

RE: (Former) Freedom ARCO Station, 15101 Freedom Avenue

Dear Mr. Pazdel:

We are in receipt of and reviewed the June 5 and June 19, 2002, SOMA Environmental Engineering, Inc. reports. The June 5 report details the installation of five (5) monitoring wells at the subject site, and also presents soil analytical data from soil samples collected during boring advancement, among other elements. The June 19 report presents the initial round of groundwater monitoring and sample analyses occurring the 2<sup>nd</sup> quarter of this year.

The June 19<sup>th</sup> report documents up to 12,000 micrograms per liter (ug/l) of methyl tert-butyl ether (MtBE) in water sampled from well MW-4, located directly downgradient and south of the former (and current) underground storage tank (UST) locations. Wells MW-3 and -4 also exhibited noteworthy MtBE impacts (2400 and 1800 ug/l, respectively). Up to 44,000 ug/l Total Petroleum Hydrocarbons as Gasoline (TPH-g) and 6600 ug/l Benzene were identified in water sampled from well MW-3, located cross-gradient of the UST location, and somewhat downgradient of the northern-most dispenser island. Water sampled from well MW-5, located substantially downgradient and southeast of both the USTs and southern-most dispenser island, exhibited a TPH-g concentration of 25,000 ug/l and Benzene concentration of 1000 ug/l. Wells MW-1, -2, and -4 also exhibited elevated concentrations of fuel hydrocarbons, but at magnitudes less than those seen in the other wells.

These data strongly suggest that additional assessment work, much of it in off-site locations, will become necessary in the next several months. This office will advise when it appears prudent to begin this next phase of work.

At this time, however, please adhere to a quarterly schedule of well sampling, monitoring and data reporting. Reports are due within 45 days of each sampling and monitoring event. The next event shall be scheduled during the 3<sup>rd</sup> quarter of 2002 (July - September), and each quarter thereafter until notified otherwise.

In future sampling events, please be certain to analyze for total fuel oxygenates using EPA Method 8260.

Please call me at (510) 567-6783 should there be any question about the content of this letter.

Mohammed Pazdel  
RE: 15101 Freedom Ave., San Leandro  
July 2, 2002  
Page 2 of 2

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott O. Seery', is written over a horizontal line. The signature is stylized and somewhat cursive.

Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB  
Shari Knieriem, SWRCB UST Fund  
Rob Weston, ACDEH  
Mansour Sepehr, SOMA Engineering, Inc.  
2680 Bishop Dr., Ste. 203, San Ramon, CA 94583  
Hamid Khatirine, 3713 Century Dr., Campbell, CA 95008-3832

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



03-12-02

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

March 11, 2002

STID 4473/ RO0000473

Mr. Mohammed Pazdel  
35840 Alcazar Court  
Fremont, CA 94536

RE: (Former) Freedom ARCO Station, 15101 Freedom Avenue – Soil and Water Investigation work plan

Dear Mr. Pazdel:

We are in receipt of and reviewed the October 2, 2001 SOMA Environmental Engineering, Inc. work plan for the installation of five (5) monitoring wells at the subject site. This work plan was later revised October 29, 2001 at the request of this office.

The cited SOMA work plan, as revised, is accepted with the following clarification:

- At least one shallow soil sample should be collected from shallow soils (~ 1-2 meter depth) for bulk density,  $f_{OC}$  and related physical analyses associated with development of a Conceptual Model and Risk-Based Corrective Action (RBCA) evaluation. This sample would be in addition to any others proposed for this purpose, and should be collected from that boring least expected to be impacted by releases at this site.
- The well seal should be allowed to set up for at least 24 hours (and preferably 72 hours if mechanical procedures are used) prior to well development. The well must also be allowed to settle for at least 24 hours between development and the initial purging/sampling event.

Please call me at (510) 567-6783 to inform me when work has been scheduled to begin at the site.

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB  
Mansour Sepehr, SOMA Engineering, Inc., 2680 Bishop Dr., Ste. 203, San Ramon, CA 94583  
Farrokh Hosseinyoun, 95 Belvedere St., Ste. 1, San Rafael, CA 94901  
Hamid Khatirine, 3713 Century Dr., Campbell, CA 95008-3832

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



8-27-01

20473

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

August 23, 2001

STID 4473

Mr. Mohammed Pazdel  
35840 Alcazar Court  
Fremont, CA 94536

RE: (Former) Freedom ARCO Station, 15101 Freedom Avenue – Request for a Soil and Water Investigation work plan

Dear Mr. Pazdel:

We are in receipt of the August 15, 2001 CSS Environmental Services, Inc. (CSS) report documenting the results of the recent preliminary assessment of the subject site. The cited CSS report documents the installation of five (5) push-tool soil borings on July 5, 2001 from which soil and water samples were collected. Collected samples were analyzed by a State-certified laboratory for a range of motor vehicle fuel components.

The results of this work confirm that underlying groundwater has been substantially impacted by a release or releases from the former fuel underground storage tank (UST) system. Up to 87,000 micrograms per liter (ug/l) methyl tert butyl ether (MtBE), 19,000 ug/l benzene, and 83,000 ug/l total petroleum hydrocarbons as gasoline (TPH-G) were identified in water sampled from boring SB-2. The extent of these impacts has not been assessed.

At this time you are requested to submit for review a Soil and Water Investigation (SWI) work plan for the continued assessment of the subject site. This work will entail the installation of an appropriate array of permanent monitoring wells. The requirement for conducting the SWI is pursuant to Sec. 2725 of Article 11, Title 23, California Code of Regulations.

**The requested SWI work plan must be submitted with 45 days of the date of this letter.**

Please be advised that this letter constitutes a request for technical reports pursuant to California Water Code Sec. 13267(b).

Please call me at (510) 567-6783 should you have any questions.

Sincerely,

  
Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB  
Farrokh Hosseinyoun, 95 Belvedere St., Ste. 1, San Rafael, CA 94901  
Hamid Khatirine, 3713 Century Dr., Campbell, CA 95008-3832



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



06-06-01

PO473

June 5, 2001

STID 4473

Mr. Mohammed Pazdel  
35840 Alcazar Court  
Fremont, CA 94536

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

RE: (Former) Freedom ARCO Station, 15101 Freedom Avenue – Preliminary Site  
Assessment Work Plan

Dear Mr. Pazdel:

Thank you for our receipt of the September 25, 2000 Cambria Environmental Technology, Inc. (Cambria) preliminary site assessment (PSA) work plan, as submitted under Hanover Incorporated (Hanover) cover dated January 29, 2001. This work plan outlines tasks necessary for completion of the initial phase of the required investigation at the subject site. The original work plan was subsequently modified in a May 30, 2001 Hanover addendum submitted following my discussions with Hanover's Peter Oblander on May 22<sup>nd</sup>.

The cited Cambria PSA work plan, as revised, has been accepted with the following clarification:

- Groundwater samples are to be collected from the completed boreholes using a device that will minimize the potential for the loss of volatile constituents in collected samples. A "mini" bailer is an example of such a device, while a peristaltic pump is not.

This work plan is to be implemented within 30 days.

Please call me at (510) 567-6783 should you have any questions and to inform me when field work has been scheduled.

Sincerely,

Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB  
Robert Weston, ACDEH  
Peter Oblander, Hanover Inc., 56 Hanover Ln., Ste. 100, Chico, CA 95973  
Farrokh Hosseinyoun, 95 Belvedere St., Ste. 1, San Rafael, CA 94901  
Hamid Khatirine, 1422 Montelegre Dr., San Jose, CA 95120

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT 5-22-2000  
reld. call

DO 473

May 19, 2000

STID 4473

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

Mr. Mohammed Pazdel  
35840 Alcazar Court  
Fremont, CA 94536

Mr. Hamid Khatirine  
1422 Montelegre Drive  
San Jose, CA 95120

RE: (Former) Freedom Arco Station, 15101 Freedom Avenue, San Leandro- Preliminary Site Assessment Work Plan

Dear Messrs. Pazdel and Khatirine:

Your case has been referred to the Alameda County District Attorney's Office, Consumer and Environmental Protection Division. This referral was prompted by your failure to comply with requests from this office for the submittal of a Preliminary Site Assessment (PSA) workplan, a violation of several provisions of the California Health and Safety Code and Title 23, California Code of Regulations.

You may contact me at (510) 567-6783 should you have any questions.

Sincerely,

Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB  
Mike O'Connor, Alameda County District Attorney's Office  
Robert Weston, ACDEH

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 4-9-2000  
incl. cc's

20473

April 4, 2000

STID 4473

Mr. Mohammed Pazdel  
35840 Alcazar Court  
Fremont, CA 94536

Mr. Hamid Khatirine  
1422 Montelegre Drive  
San Jose, CA 95120

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

**NOTICE OF VIOLATION**

RE: (Former) Freedom Arco Station, 15101 Freedom Avenue, San Leandro- Preliminary Site Assessment Work Plan

Dear Messrs. Pazdel and Khatirine:

In correspondence from this office dated January 3, 2000, you were directed to submit a Preliminary Site Assessment (PSA) workplan for the investigation of the subject site due to the verified release of gasoline from the underground storage tank (UST) system previously located there. This workplan was due for submittal within 60 days of the date of that letter, on or around March 3, 2000. The requested workplan has not been submitted.

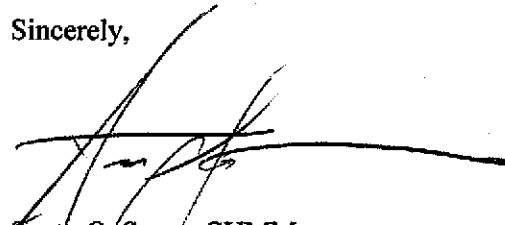
You are currently in violation of provisions of Article 11, *Corrective Action Requirements*, Title 23, California Code of Regulations (CCR) for your collective failure to submit the requested PSA workplan. California Health & Safety Code Section 25299(a)(6) and (b)(6) provide for penalties for such violations of up to \$5000 per violation per day the violation occurs.

As this NOTICE OF VIOLATION documents only the latest in a series of such violations related to UST removals, replacement, and investigation projects at this site in the last 8 months or so, your case will be referred to the Alameda County District Attorney's Office for enforcement action should the subject PSA workplan not be submitted within 20 days of the date of this letter.

You may contact me at (510) 567-6783 should you have any questions regarding the content of this letter or your responsibility to comply with the directives presented herein.

Messrs. Pazdel and Khatirine  
Re: 15101 Freedom Ave., San Leandro  
April 4, 2000  
Page 2 of 2

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB  
Mike O'Connor, Alameda County District Attorney's Office  
Robert Weston, ACDEH

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Sent 11-18-99  
Including cc's

20473

November 17, 1999

STID 4473

Mr. Mohammed Pazdel  
35840 Alcazar Court  
Fremont, CA 94536

Mr. Rick Hirsch  
Service Station Properties  
640 So. Winchester Boulevard  
San Jose, CA 95128

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6700  
(510) 337-9432

**NOTICE OF VIOLATION**

RE: 15101 Freedom Boulevard, San Leandro – Soil Stockpile Management

Dear Messrs. Pazdel and Hirsch:

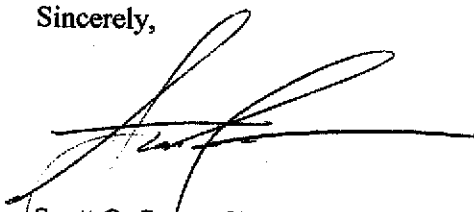
This NOTICE OF VIOLATION is being issued for your collective failure to initiate proper stockpile management practices in preparation for and response to the onset of the rainy season. This large, uncovered soil stockpile represents a substantial threat to surface water runoff in the area of the site. Such uncovered soil piles and their consequent run-off are violations of the Alameda County Clean Water Program's National Pollution Discharge Elimination System (NPDES) permit.

**At this time you are directed to immediately cover this soil pile in its entirety pending its lawful off-site disposal. Further, within 30 days, this soil pile must be removed and disposed of at a state-licensed landfill of the appropriate classification.**

Please be advised that failure to comply with these directives will result in the referral of this case to the appropriate enforcement agency. Please be further advised that other agencies sharing jurisdiction over this and related issues may pursue other enforcement actions independent of those initiated by this office.

I may be reached at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,

  
Scott O. Seery, CHMM  
Hazardous Materials Specialist

Messrs. Pazdel and Hirsch  
RE: 15101 Freedom Ave., San Leandro  
November 17, 1999  
Page 2 of 2

cc: Ariu Levi, Chief, Environmental Protection  
Robert Weston, ACDEH  
Chuck Headlee, RWQCB  
Paul Smith, Alameda County Public Works, Clean Water Program  
Nick Chimenko, Alameda County Fire Department

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0473

RAFAT A. SHAHID, Assistant Agency Director

Alameda County  
Environmental Protection Division  
1131 Harbor Bay Parkway, Room 250  
Alameda CA 94502-6577

CC4580

June 23, 1995

Mr. Mohammed Mashoon  
13775 Campus Drive  
Oakland, CA 94605

RE: FREEDOM ARCO MINIMART, 15101 FREEDOM AVENUE, SAN LEANDRO

Dear Mr. Mashoon:

This office has reviewed the June 1, 1992 Timmerman Engineering Construction (TEC) underground storage tank (UST) closure report. This report documents the May 13, 1992 closure of a single waste oil UST and appurtenant piping at the referenced site. The cited TEC report documents that no noteworthy release of waste oil or constituents has occurred.

Based on the information made available to this office, no further environmental investigation is required at the subject site. Therefore, this department is satisfied that the subject USTs have been closed in full compliance with the requirements of Title 23, California Code of Regulations.

Please contact me at 510/567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director  
Amir Gholami, ACDEH  
Jim Ferdinand, Alameda County Fire Department

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0473

RAFAT A. SHAHID, Assistant Agency Director

December 14, 1993

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

Mr. Mohammed Pazdel  
Freedom Arco Mini Market  
15101 Freedom Avenue  
San Leandro, CA 94578

**Subject: Five-Year Permit for Operation of Three  
Underground Storage Tanks (USTs) at  
Freedom Arco Mini Market  
15101 Freedom Avenue  
San Leandro, CA 94578**

As a follow-up to our meeting December 13, 1993, I have included a checklist of documents that are still needed to issue the permit to operate your tanks. Please complete the following items marked below and return them to me within 30 days. The example plans provided should be used only as guidelines and may not meet your specific requirements under Title 23. As we discussed at our meeting on December 13, you will have line leak detectors installed and provide a copy of the blueprints for the tank installation. Please submit the following check marked items:

1. Completed UST PERMIT FORM A - one per facility.
2. Completed UST PERMIT FORM B - one per tank.
3. Completed UST PERMIT FORM C - one per tank.
4. Written tank monitoring plan. (sample provided)
5. Results of precision tank test(s) (initial/annual).
6. Results of precision pipeline leak detector tests (initial/annual).
7. An accurate and complete plot plan. (sample provided)
8. Written spill response plan. (sample provided)

**Title 23 of the California Code of Regulations prohibits the operation of ANY UST without a permit.** Please feel free to contact me at (510) 271-4320 if you have any questions regarding the process of completing the mandatory five year permit.

Sincerely,

  
Robert Weston  
Hazardous Materials Specialist

cc: files