

December 20, 2006

R0480

2006 DEC 21 AM 9:39

Mr. Don Hwang
Hazardous Materials Specialist
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Number 250
Alameda, California 94502

Subject: **Response to Comments**
Former Sears Auto Center #1058B
2600 Telegraph Ave.
Oakland, California
Case I.D. # STID 1082
For Sears Holdings Management Corporation

Dear Mr. Hwang:

The following are responses to comments provided in the May 10, 2006 Alameda County Environmental Health Services (ACEHS) correspondence. ACEHS requested that their technical comments be addressed and the technical reports submitted. ACEHS' comments are italicized and URS' responses are provided in regular text below each comment.

Technical Comments

1) *Other soils exceeding ESLs – Soil samples collected during the installation of monitoring wells MW-2, MW-3, and MW-4, detected up to 3,400 micrograms/kilogram (mg/kg), 2,200 mg/kg, and 1,600 mg/kg, respectively. Please propose the excavation of these soils or indicate why these soils should not also be removed.*

Although the preliminary results of hydrocarbon analyses in soil appears to be elevated, it should be noted that these results are from samples collected in 1992 (14 years ago) and should not be reflective of Site conditions for the following reasons:

- Natural degradation processes have likely resulted in reduced hydrocarbon concentrations under present-day conditions.
- The analytical method (EPA 418.1) used to test for total petroleum hydrocarbons (TPH) in 1992 does not correspond to standards presented by the Environmental Screening Level (ESL) guidance. The EPA 418.1 method accounts for a full spectrum of hydrocarbons as one test; however, the ESL guidance calls for screening of total petroleum hydrocarbons as gasoline-range (TPHg), middle distillates or diesel-range (TPHd), and residual fuels or oil-range (TPHo). Therefore, the 1992 test results cannot be compared with the ESL guidance criteria.

In order to assess the potential impacts of hydrocarbons beneath the Site, URS conducted a closure assessment in February 2004 that included the collection and analysis of soil samples in accordance with ESL guidance criteria. Confirmation borings (CB-4 and CB-5) drilled in the vicinity of wells MW-2 and MW-4 indicated only limited detections of TPHg from 1.3 mg/kg to 72.1 mg/kg. This is well below the most conservative residual Tier 1 ESL of 100 mg/kg for TPHg.

On the basis of these results and due to the historical and outdated nature of the previous TPH detections, remedial action does not appear justified or warranted. However, there is no recent TPH data for the vicinity of well MW-3. Therefore, in order to further substantiate Site conditions, URS proposes collecting additional soil samples at two locations in the vicinity of well MW-3 as shown on Figure 1.

2) *1,1,2-trichloroethane at CBI exceeded ESLs – The ESL for deep soils where groundwater is a current or potential source of drinking water are 0.032 mg/kg for residential land use and 0.07 mg/kg for commercial/industrial land use. 0.102 mg/kg was detected in CBI. Please propose the excavation of these soils or indicate why these should not also be removed.*

It should be noted that the San Francisco Bay Area Regional Water Quality Control Board (RWQCB) established the Environmental Screening Levels (ESLs) for soil using a “tiered” approach. The Tier 1 ESLs are based on a generic and conservative assessment of soil conditions that are protective of drinking water and human exposure. Site-specific conditions are not taken into consideration. The 1,1,2-Trichloroethane (1,1,2-TCA) ESLs referenced in Comment 2 reflect values from the Tier 1 look-up table. However, Site-specific conditions strongly suggest that Tier 2 or Tier 3 analysis will support no further remedial action of 1,1,2-TCA for the following reasons:

- The detection of 1,1,2-TCA at 0.102 mg/kg is below the USEPA Region 9 Preliminary Remediation Goal (PRG) of 0.73 mg/kg and 1.61 mg/kg for residential and industrial exposure, respectively. Consequently, there should be no direct exposure concern for 1,1,2-TCA in soil beneath the Site.
- Although 1,1,2-TCA was detected in soil at 10 feet below ground surface (bgs) there were no detections of two deeper samples (15 and 20 feet bgs) collected above groundwater in the same borehole. Furthermore, 1,1,2-TCA has been monitored during nine quarterly groundwater sampling events (first quarter 2002 through first quarter 2004) and there have been no detections. These results indicate that there is little, if any, potential impact of 1,1,2-TCA to groundwater beneath the Site.

On the basis of these conditions, URS recommends an additional Tier 2 or Tier 3 analysis to verify a likely “no further action” scenario for 1,1,2-TCA in soil beneath the Site.

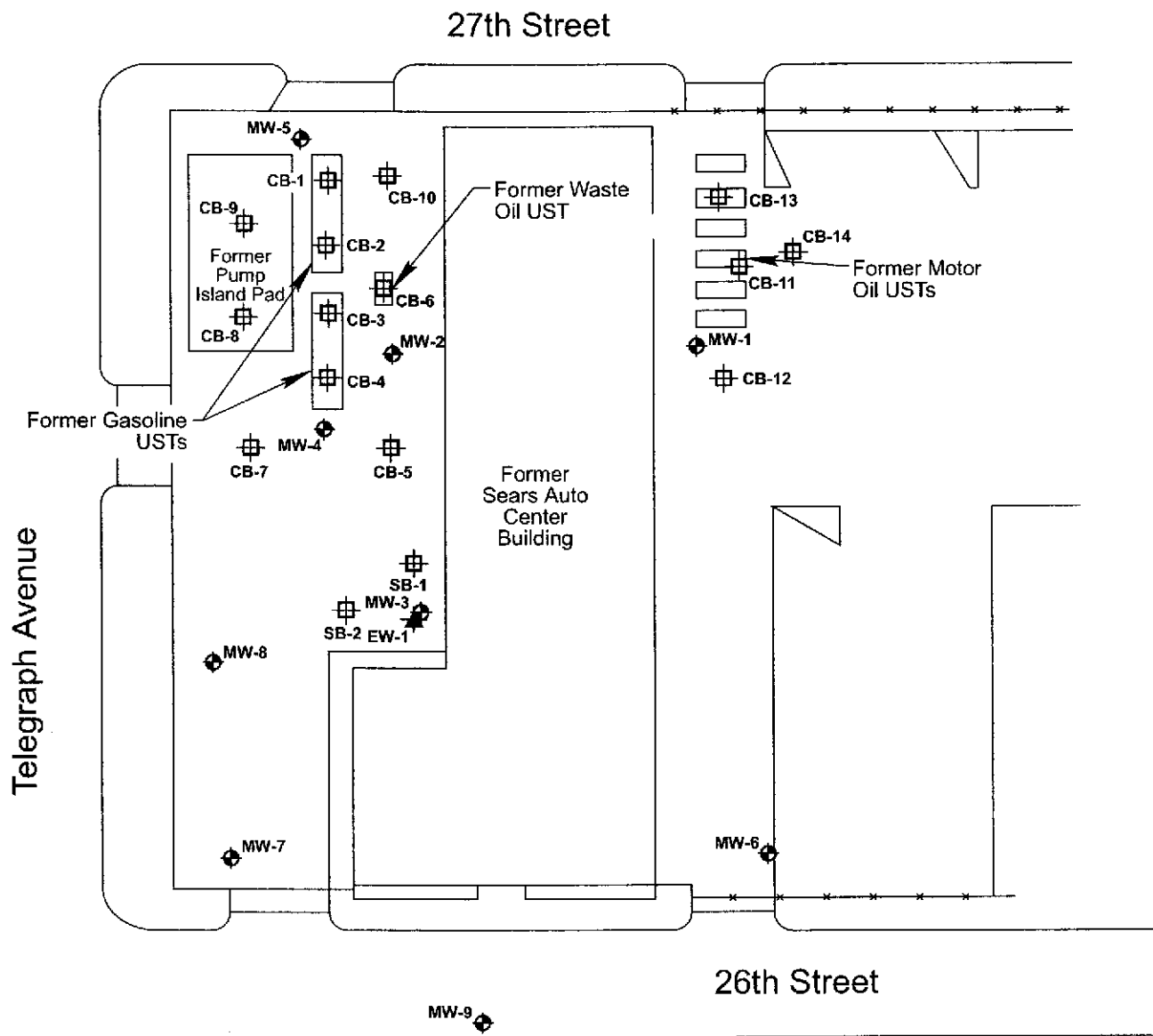
Feel free to contact me at (714) 648-2779 if you have any questions or comments regarding the responses to ACEHS comments and requirements.

Respectfully submitted,
URS CORPORATION



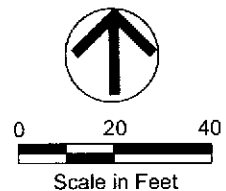
Joseph R. Liles
Project Manager

cc: Mr. Bruce Kaye – Sears Holdings Management Corporation



LEGEND

- MW-8 MONITORING WELL LOCATION
- EW-1 EXTRACTED WELL LOCATION
- CHAIN LINK FENCE
- CB-1 CONFIRMATION SOIL BORING LOCATION (URS, 2004)
- SB-1 PROPOSED SOIL BORING LOCATIONS



PLOT PLAN WITH PROPOSED SOIL BORING LOCATIONS	
Project: Sears Auto Center #1058, 2600 Telegraph Avenue, Oakland, CA	
Project No.: 29863494	Figure 1
Date.: AUGUST 2006	

G:\1128\Sears_128\Oakland\2600 Telegraph Ave\2006\plot plan with soil boring loc.fh11 6/05

Ro 480

Hwang, Don, Env. Health

From: Joe_Liles@URSCorp.com
Sent: Wednesday, December 13, 2006 12:27 PM
To: Hwang, Don, Env. Health
Subject: Sears Auto Center #1058B, 2600 Telegraph Ave, Oakland, CA

Don Hwang
Hazardous Materials Specialist
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Number 250
Alameda, California 94502

Subject: Fuel Leak Case No. RO0000480, Sears Auto Center #1058B, 2600 Telegraph Ave, Oakland, CA

Dear Mr. Hwang:

Pursuant to our December 12, 2006 telephone conversation regarding the subject site, URS, on behalf of Sears, Roebuck & Co., plans to submit a technical response to your letter dated May 10, 2006 by December 30, 2006. Your May 10, 2006 letter was in response to our "Addendum to Site Closure Assessment" report dated June 24, 2005. Your letter also requested that Sears submit a "proposal for additional excavation" by July 10, 2006. Per our discussion, URS required additional time to review the project materials and prepare an appropriate technical response, which will be submitted by December 30, 2006. Please feel free to contact me if you have any questions or concerns.

Very truly yours,
URS Corporation

Joseph Liles, RG
Project Manager
2020 East First Street, Suite 400
Santa Ana, Ca 92705
Office - 714-648-2779
Cell - 714-697-6996
Fax - 714-667-7147

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



7

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

May 10, 2006

Scott DeMuth
Sears, Roebuck & Co.
Department 824C, Building A2-281A
Hoffman Estates, IL 60179

Dear Mr. DeMuth:

Subject: Fuel Leak Case No. [REDACTED] Sears Auto Center #1058B, 2600
Telegraph Ave., Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed "Addendum to Site Closure Assessment" dated June 24, 2005, prepared by URS Corporation (URS). URS recommended the excavation of soils from borings CB3, CB5, and CB8 containing residual hydrocarbon concentrations that exceed California Regional Water Quality Control Board (RWQCB) San Francisco Bay Region's Environmental Screening Levels (ESLs). Before your case can be closed, we request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) Other soils exceeding ESLs – Soil samples collected during the installation of monitoring wells MW-2, MW-3, and MW-4, detected up to 3,400 microgram/kilogram (mg/kg), 2,200 mg/kg, and 1,600 mg/kg, respectively. Please propose the excavation of these soils or indicate why these soils should not also be removed. 2-4/06 DKA
- 2) 1,1,2 trichloroethane at CB1 exceeded ESLs - The ESL for deep soils where groundwater is a current or potential source of drinking water are 0.032 mg/kg for residential land use and 0.07 mg/kg for commercial/industrial land use. 0.102 mg/kg was detected in CB1. Please propose the excavation of these soils or indicate why these soils should not also be removed.

TECHNICAL REPORT REQUEST

Please submit the information requested to Alameda County Environmental Health (Attention: Don Hwang), by:

July 10, 2006 - Proposal for Additional Excavation

Mr. DeMuth
May 10, 2006
Page 2 of 2

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.

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

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Joe Lyles, URS Corp., 2020 E. 1st St., Suite 400, Santa Ana, CA 92705
Donna Drogos
file

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
05/11/06

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

May 10, 2006

Scott DeMuth
Sears, Roebuck & Co.
Department 824C, Building A2-281A
Hoffman Estates, IL 60179

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Subject: Fuel Leak Case No. RO0000480, Sears Auto Center #1058B, 2600
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If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Joe Lyles, URS Corp., 2020 E. 1st St., Suite 400, Santa Ana, CA 92705
Donna Drogos
file

October 5, 2005

Mr. ~~Barney M. Chan~~ ^{D4}
 Hazardous Materials Specialist
 Alameda County Environmental Health Services
 1131 Harbor Bay Parkway, Number 250
 Alameda, California 94502

Alameda County
 OCT 10 2005
 Environmental Health

Subject: **Response to Comments**
Former Sears Auto Center #1058
2633 Telegraph Ave.
Oakland, California
Case I.D. # RO0002600
For Sears, Roebuck & Co.

Dear Mr. Chan:

The following are responses to comments provided in the November 22, 2004 Alameda County Environmental Health Services (ACEHS) correspondence. ACEHS requested that their technical comments be addressed and that the requested technical reports submitted. ACEHS' comments are italicized and URS' responses are provided in regular text below each comment.

Technical Comments

1) *Conduit/Preferential Pathway Study: Please provide a conduit/preferential pathway study for this site including a map showing the locations of utilities within the expected plume areas. This should include sewers, storm drains, trenches, etc. Please also provide a well survey of all wells (monitoring, production, abandoned, destroyed, etc) within a 1/4 mile radius of the site.*

The requested items are included in the 2005 Annual Groundwater Monitoring Report. The requested items can be located as follows:

- The conduit/preferential pathway study is provided in Section 5.0;
 - A map showing the locations of utilities is included as Figure 2; and
 - The well survey data is provided in Appendix B.
- 2) *Contaminant Plume Definition: It appears that the lateral and vertical extent of each of the contaminant source areas has not been determined. Our office acknowledges that the release detected in the southwest corner of this site is likely the result of release(s) from a former dry cleaner site located at 2601 Telegraph Ave. However, it appears that at least two additional sources of petroleum releases existed at the site; the former heating oil tank closed-in-place and near the "possible" tire and oil shop. It is not likely that the heating oil tank caused the contamination detected near boring EB-5. Please provide a cross section diagram in the north-south direction including these two areas with soil and groundwater*

locations and concentrations noted plus depth to water. Should the lateral and vertical extent of contamination not be defined, you are requested to provide a work plan to complete any data gaps. Please include estimations for the extent of free product and dissolved product and a rose diagram indicating the historic groundwater gradients.

The requested items are included in the 2005 Annual Groundwater Monitoring Report. The requested items can be located as follows:

- The north-south cross section is included as Figure 4;
- A work plan to address data gaps is included in Section 7.0;
- The estimated extent of groundwater impacts are shown on Figure 6; and
- The rose diagram indicating the historic groundwater gradients is included as Appendix H.

Sears maintains that it is solely responsible for the impacts associated with the former fuel oil underground storage tank. Therefore, no additional investigation was proposed in association with the impacts near boring EB-5, the former location of the "possible" oil and tire shop. The available data associated with the impacts near the "possible" oil and tire shop, however, are included on the requested cross section.

3) Interim Cleanup- We request that you evaluate the need to perform interim cleanup to remove/remediate free product and/or heavily impacted areas. Include your recommendations with the report(s) requested above.

Interim cleanup to remediate free product at the site was started in June 2005. A SoakEase™ adsorbent "sock" was installed in monitoring well FOMW-1 to remove free product from that well. The adsorbent system that was installed includes a stainless steel mesh canister that holds a two inch outer diameter, three foot long adsorbent "sock", capable of adsorbing one quart of fuel oil product. Additional discussion of the interim cleanup activities is included in Section 8.0 of the 2005 Annual Groundwater Monitoring Report.

4) Corrective Action Plan: We request that you propose soil and groundwater cleanup objectives for the site. These should be consistent with the current and future use of the site. The cleanup goals must adequately protect human health and safety, the environment, eliminate nuisance conditions, and protect water resources. Please reference your cleanup goals.

The proposed soil and groundwater cleanup objectives for the site are provided in Section 9.0 of the 2005 Annual Groundwater Monitoring Report, and were previously provided and referenced in the Additional Site Assessment and 2002 First Quarter Groundwater Monitoring Report dated August 27, 2002.

Former Sears Auto Center #1058
October 5, 2005
Page 3 of 3

- 5) *Groundwater Monitoring– Until the site is closed, we request that groundwater monitoring continue at the site annually in January and free product, if present, be removed on a more frequent basis. Please include the analysis for naphthalene given the known presence of this compound in diesel fuel in addition to TPHss and TPHd.*

Comment acknowledged.

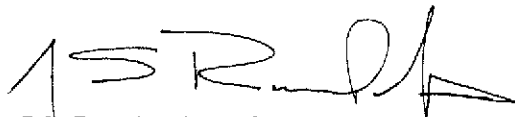
Technical Report Request

- *December 27, 2004- Conduit/Preferential Pathway study, contaminant definition cross-sections and diagrams, work plan for additional contaminant delineation, interim remediation recommendation and corrective action plan cleanup recommendation and corrective action plan cleanup recommendation and cleanup goals.*
- *January 10, 2004- Groundwater sampling report.*

Comment acknowledged.

Feel free to contact me at (714) 648-2793 if you have any questions or comments regarding the responses to ACEHS comments and requirements.

Respectfully submitted,
URS CORPORATION



J.S. Rowlands, P.G., C.H.G., C.E.G.
Project Manager

cc: Mr. Bruce Kaye – Sears, Roebuck & Co.

ALAMEDA COUNTY
HEALTH CARE SERVICES

January 19, 2005

AGENCY

DAVID J. KEARS, Agency Director



SENT
01-20-05

~~Scott DeMuth~~

Sears, Roebuck & Co.
Department 824C, Building A2-281A
Hoffman Estates, IL 60179

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

Dear Mr. DeMuth:

Subject: Fuel Leak Case No. RO0000480, Sears Auto Center #1058B, 2600
Telegraph Ave., Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed "2004 First Quarter Groundwater Monitoring and Site Closure Assessment" dated June 25, 2004, prepared by URS Corporation (URS). Before your case can be closed, we request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

Petroleum hydrocarbons concentrations were not evaluated for risk. – Although petroleum hydrocarbons are not included in look-up tables in the Oakland ULR Program Guidance Document, petroleum hydrocarbons can be found elsewhere, such as the San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels (ESLs). Please evaluate petroleum hydrocarbons for risk and include as an Addendum to "Site Closure Assessment".

TECHNICAL REPORT REQUEST

Please submit the information requested to Alameda County Environmental Health (Attention: Don Hwang), by:

March 19, 2005 - Addendum to "Site Closure Assessment"

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

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: J. S. Rowlands, URS Corp., 2020 E. 1st St., Suite 400, Santa Ana, CA 92705
Donna Drogos
file



January 19, 2005

Scott DeMuth
Sears, Roebuck & Co.
Department 824C, Building A2-281A
Hoffman Estates, IL 60179

Dear Mr. DeMuth:

Subject: Fuel Leak Case No. RO0000480, Sears Auto Center #1058B, 2600
Telegraph Ave., Oakland, CA

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

This letter is to inform you of legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, you have been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.

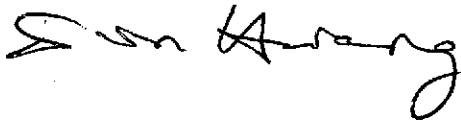
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

You may use the enclosed "notice of proposed action" form (sample letter 3) as a template to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

Please call me at (510) 567-6746 should you have any questions about the content of this letter.

Sincerely,



Don Hwang
Hazardous Materials Specialist

Enclosures
c: file

SAMPLE LETTER (2): LIST OF LANDOWNERS FORM

Name of local agency
Street address
City

SUBJECT: CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR (*Site Name and Address*)

(Note: Fill out item 1 if there are multiple site landowners. If you are the sole site landowner, skip item 1 and fill out item 2.)

1. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (*name of primary responsible party*), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:

2. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (*name of primary responsible party*), certify that I am the sole landowner for the above site.

Sincerely,

Signature of primary responsible party

Name of primary responsible party

SAMPLE LETTER 3: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY

Name of local agency
Street address
City

SUBJECT: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY
FOR *(Site Name and Address)*

In accordance with section 25297,15(a) of Chapter 6.7 of the Health & Safety Code, I, *(name of primary responsible party)*, certify that I have notified all responsible landowners of the enclosed proposed action. Check space for applicable proposed action(s):

- cleanup proposal (corrective action plan)
- site closure proposal
- local agency intention to make a determination that no further action is required
- local agency intention to issue a closure letter

Sincerely,

Signature of primary responsible party

Name of primary responsible party

cc: Names and addresses of all record fee title owners



RO 480

April 19, 2004

Mr. Don Hwang
Hazardous Materials Specialist
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Number 250
Alameda, California 94502

Alameda County
APR 21 2004
Environmental Health

Subject: **Reporting Requirements
Former Sears Auto Center #1058B
2600 Telegraph Ave.
Oakland, California
Case I.D. # STID 1082
For Sears, Roebuck & Co.**

Dear Mr. Hwang:


URS Corporation (URS) is requesting a second extension for submittal of the Final Report regarding the preferential pathway study and recent confirmation soil borings in areas of former underground storage tanks (USTs) at the above listed site.

Alameda County Environmental Health Services (ACEHS) correspondence dated January 26, 2004 requested that the Final Report for confirmation soil sampling and preferential pathway study at this site be submitted to ACEHS by March 26, 2004. Drilling of the confirmation borings was completed on February 18, 2004. URS subsequently requested a list of groundwater wells within a quarter mile radius of the site from Mr. James Yoo of the Alameda County Public Works Agency Water Resources Section on February 19, 2004. Mr. Yoo contacted URS on April 15, 2004 and indicated that the well search had not been completed to date. Mr. Yoo stated that he would complete the well search as soon as possible. Due to the additional time required to complete the site closure analysis following receipt of the well search data, URS is requesting an extension of the report submittal deadline to thirty days following the receipt of the requested information from Alameda County.

Nine consecutive quarters of groundwater monitoring has demonstrated that natural attenuation is occurring, the impacted plume is stable (i.e., not migrating), the plume size and concentrations are significantly reduced. Further groundwater monitoring has been suspended at the Site pending review of the site closure analysis by ACEHS.

Feel free to contact me at (714) 648-2793 if you have any questions or comments regarding this request.

Respectfully submitted,
URS Corporation


J.S. Rowlands, R.G., C.HG.
Project Manager

cc: Mr. Scott DeMuth – Sears, Roebuck & Co.

March 15, 2004

Mr. Don Hwang
Hazardous Materials Specialist
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Number 250
Alameda, California 94502

Alameda County
MAR 16 2004
Environmental Health

Subject: **Reporting Requirements**
Former Sears Auto Center #1058B
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For Sears, Roebuck & Co.

Dear Mr. Hwang:

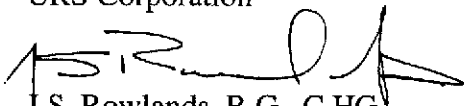
URS Corporation (URS) is requesting an extension for submittal of the Final Report regarding the preferential pathway study and recent confirmation soil borings in areas of former underground storage tanks (USTs) at the above listed site.

Alameda County Environmental Health Services (ACEHS) correspondence dated January 26, 2004 requested that the Final Report for confirmation soil sampling and preferential pathway study at this site be submitted to ACEHS by March 26, 2004. Drilling of the confirmation borings was completed on February 18, 2004. URS subsequently requested a list of groundwater wells within a quarter mile radius of the site from Mr. James Yoo of the Alameda County Public Works Agency Water Resources Section on February 19, 2004. Mr. Yoo has indicated it will take 4 to 6 weeks to return the requested well information to URS.

On March 3, 2004, URS also requested information from Pacific Gas and Electric (PG&E) regarding the location of electrical and gas lines adjacent the Site. PG&E has not yet responded to the request for information. Due to the additional time required to obtain the necessary information to complete the preferential pathway study, URS is requesting an extension of the report submittal deadline to April 21, 2004.

Feel free to contact me at (714) 648-2793 if you have any questions or comments regarding this request.

Respectfully submitted,
URS Corporation


J.S. Rowlands, R.G., C.H.G.
Project Manager

cc: Mr. Scott DeMuth – Sears, Roebuck & Co.

URS Corporation
2020 East First Street, Suite 400
Santa Ana, CA 92705
Tel: 714.835.6886
Fax: 714.667.7147



February 2, 2004

Mr. Don Hwang
Hazardous Materials Specialist
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Number 250
Alameda, California 94502

Alameda County
FEB 05 2004
Environmental Health

Subject: **Response to Comments**
Former Sears Auto Center #1058B
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For Sears, Roebuck & Co.

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Technical Comments

1) *Boring Sampling - Instead of collecting soil boring samples every 5 ft. as proposed, soil samples shall be collected at a minimum of every 5 ft., including at changes of lithology, at the soil/groundwater interface, and at areas of obvious contamination.*

Comment acknowledged.

2) *Groundwater analyses - We requested that you include analyses for Ethanol. Ethanol analyses has not been initiated. In response to our letter dated April 11, 2003, URS stated that all groundwater samples will also be analyzed for Ethanol by EPA method 8260B in a future sampling event in their letter dated June 5, 2003. If Ethanol is detected, and is 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.*

Ethanol analysis has been conducted on groundwater samples collected during quarterly monitoring events since the second quarter 2003. Results are provided in Table 2 and Appendix B (laboratory analytical report) of the submitted quarterly monitoring reports. Ethanol has not been detected in any of the groundwater samples.

3) *Well Survey - A list of wells within a quarter mile radius of the site which may be potential receptor was requested in our letter dated April 11, 2003. This comment was acknowledged in URS's letter dated June 5, 2003. Also, please provide a map which shows their locations*

URS Corporation
2020 East First Street, Suite 400
Santa Ana, CA 92705
Tel: 714.835.6886
Fax: 714.667.7147

in relation to the subject site. Please report your results in the Soil and Water Investigation (SWI) Report requested below.

Comment acknowledged.

- 4) *Preferential Pathway Study – We requested a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal vertical migration that may be present in the vicinity of the site in our letter dated April 11, 2003. Of particular concern is the identification of abandoned wells and improperly-destroyed wells that can act as vertical conduits to deeper water bearing zones, pumping wells in the vicinity of your site, and manmade conduits for shallow migration. Discuss your analysis and interpretation of the results of the preferential pathway study (including the detailed well survey and utility survey requested below). Please include an evaluation of the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction of deeper water aquifers.*

An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc. within and near the site and plume area(s) is required as part of your study. Submittal of map(s) and cross-sections showing the location and depth of all utility lines and trenches is required as part of your study. These comments were acknowledged in URS's letter dated June 5, 2003. Please report your results in the Soil and Water Investigation Report (SWI) requested below.

Comment acknowledged.

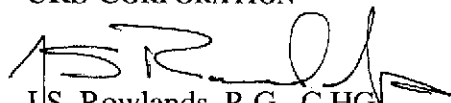
Technical Report Request

Please submit the information requested to Alameda County Environmental Health (Attention: Don Hwang), by March 26, 2004.

Comment acknowledged.

Feel free to contact me at (714) 648-2793 if you have any questions or comments regarding the responses to ACEHS comments and requirements.

Respectfully submitted,
URS CORPORATION


J.S. Rowlands, R.G., C.H.G.
Project Manager

cc: Mr. Scott DeMuth – Sears, Roebuck & Co.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



01-27-04

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

January 26, 2004

Scott DeMuth
Sears, Roebuck & Co.
Department 824C, Building A2-281A
Hoffman Estates, IL 60179

Dear Mr. DeMuth:

Subject: Fuel Leak Case No. RO0000480, Sears Auto Center #1058B, 2600 Telegraph Ave., Oakland, CA

Thank you for your letter dated August 26, 2003 and "Work Plan Addendum #2" dated January 24, 2004, both prepared by URS Corporation (URS). Additionally, "2003 3rd Quarter Monitoring Report" dated December 10, 2003 prepared by URS was reviewed. Groundwater contaminant concentrations have been a little above or below detection limits. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) Boring Sampling - Instead of collecting soil boring samples every 5 ft. as proposed, soil samples shall be collected at a minimum of every 5 ft., including at changes of lithology, at the soil/groundwater interface, and at areas of obvious contamination.
- 2) Groundwater Analyses - We requested that you include analyses for Ethanol. Ethanol analyses has not been initiated. In response to our letter dated April 11, 2003, URS stated that all groundwater samples will also analyzed for Ethanol by EPA Method 8260B in a future sampling event in their letter dated June 5, 2003. If Ethanol is detected, and is 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.
- 3) Well Survey - A list of wells within a quarter mile radius of the site which may be potential receptors was requested in our letter dated April 11, 2003. This comment was acknowledged in URS's letter dated June 5, 2003. Also, please provide a map which shows their locations in relation to the subject site. Please report your results in the Soil and Water Investigation Report (SWI) Report requested below.
- 4) Preferential Pathway Study - We requested a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site in our letter dated April 11, 2003. Of particular concern is the identification of abandoned wells and improperly-destroyed wells that can act as vertical conduits to deeper water bearing zones, pumping wells in the vicinity of your site, and manmade conduits for shallow migration. Discuss your analysis and interpretation of the results of the preferential

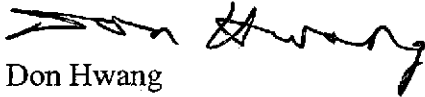
pathway study (including the detailed well survey and utility survey requested below). Please include an evaluation of the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers.

An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Submittal of map(s) and cross-sections showing the location and depth of all utility lines and trenches within and near the site and plume area(s) is required as part of your study. These comments were acknowledged in URS's letter dated June 5, 2003. Please report your results in the Soil and Water Investigation Report (SWI) requested below.

TECHNICAL REPORT REQUEST

Please submit the information requested to Alameda County Environmental Health (Attention: Don Hwang), by March 26, 2004. If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: J. S. Rowlands, URS Corp., 2020 E. 1st St., Suite D, Santa Ana, CA 92705
Donna Drogos
file



August 26, 2003

Mr. Don Hwang
Hazardous Materials Specialist
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Number 250
Alameda, California 94502

Subject: **Response to Comments**
Former Sears Auto Center #1058B
2600 Telegraph Ave.
Oakland, California
Case I.D. # STID 1082
For Sears, Roebuck & Co.

Dear Mr. Hwang:

The following are responses to comments provided in the July 8, 2003 Alameda County Environmental Health Services (ACEHS) correspondence. ACEHS requested that their technical comments are addressed and the requested technical reports submitted. The ACEHS comments are italicized and the URS responses are provided in regular text below each comment.

Technical Comments

1) *Proposed Boring Locations* –

- a. *T5 – The report describing the removal of the tanks did not include T5 as one of those with poor integrity and holes. T6 was noted to have a cracked seam on its southwestern weld and the soil to the north and south of the tank was stained. It appears that sample locations ought to be by T6 instead of T5. If you agree, propose sample locations by T6.*
- b. *In the area of the gasoline tanks – We do not have a report describing the removal of these tanks, including sample locations and results. Without such information, sampling may be duplicated. Please provide so that we can determine the locations previously sampled.*

The proposed confirmation boring locations were placed in a grid pattern throughout the former tank locations to collect current data from the former underground storage tank (UST) areas regardless of the historical site data. The proposed boring location in the area of removed UST-T5 will be moved to UST-T6. A figure showing the revised proposed confirmation soil boring locations is provided in Attachment A.

Sears' has completed a review of the archived project files. No reports or data regarding the removal of the gasoline USTs at the former auto center were found. Subsurface soils in the areas of the removed gasoline USTs will be evaluated during the site closure assessment.

URS Corporation
2020 East First Street, Suite 400
Santa Ana, CA 92705
Tel: 714.835.6886
Fax: 714.667.7147



Former Sears Auto Center #1058B
August 26, 2003
Page 2 of 2

Technical Report Request

Please submit the information requested to Alameda County Environmental Health (Attention: Don Hwang), by September 8, 2003.

Comment acknowledged.

Feel free to contact me at (714) 648-2793 if you have any questions or comments regarding the responses to ACEHS comments and requirements.

Respectfully submitted,
URS CORPORATION

J.S. Rowlands, R.G., C.H.G.
Senior Project Geologist

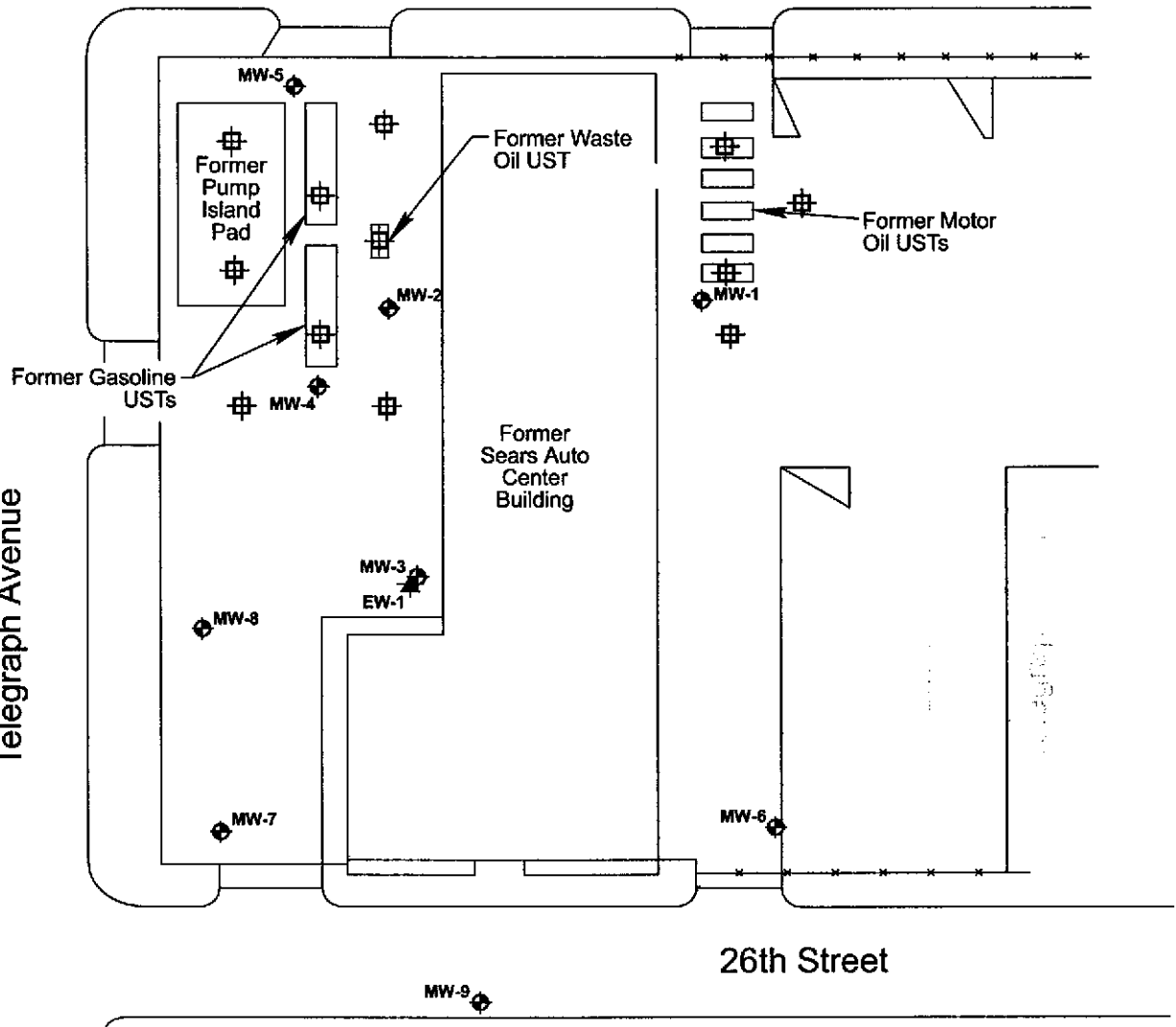
Attachments:

Attachment A: Figure Showing Revised Confirmation Soil Boring Locations

cc: Mr. Scott DeMuth – Sears, Roebuck & Co.





27th Street

Telegraph Avenue



26th Street

LEGEND

- MW-8  **MONITORING WELL LOCATION**
- EW-1  **EXTRACTED WELL LOCATION**
-  **CHAIN LINK FENCE**
-  **PROPOSED CONFIRMATION SOIL BORING LOCATION**



0 20 40
Scale in Feet

PROPOSED CONFIRMATION SOIL BORING LOCATIONS

Project: Sears Auto Center #1058,
2600 Telegraph Avenue, Oakland, CA

Project No.: 29863494

Date.: AUGUST 2003

Figure 1

G:/128/Sears128/Oakland/2600/2003/proposed confirm boring loc.fh10 8/03

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



09-03

July 8, 2003

Scott DeMuth
Sears, Roebuck & Co.
Department 824C, Building A2-281A
Hoffman Estates, IL 60179

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

Dear Mr. DeMuth:

Subject: Fuel Leak Case No. RO0000480, Sears Auto Center#1058B, 2600 Telegraph Ave., Oakland, CA

Thank you for your letter dated June 5, 2003 which responded to our comments regarding "3rd Quarter Monitoring Report and Work Plan for Confirmation Soil Borings" dated January 23, 2003 prepared by URS Corporation. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

1) Proposed Boring Locations -

- a) T5 - The report describing the removal of the tanks did not include T5 as one of those with poor integrity and holes. T6 was noted to have a cracked seam on its southwestern weld and the soil to the north and south of the tank was stained. It appears that sample locations ought to be by T6 instead of T5. If you agree, propose sample locations by T6.
- b) In the area of the gasoline tanks - We do not have a report describing the removal of these tanks, including sample locations and results. Without such information, sampling may be duplicated.

TECHNICAL REPORT REQUEST

Please submit the information requested to Alameda County Environmental Health (Attention: Don Hwang), by September 8, 2003. If you have any questions, please call me at (510) 567-6746.

Sincerely,

A handwritten signature in black ink that reads "Don Hwang".

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: J. S. Rowlands, URS Corp., 2020 E. 1st St., Suite D, Santa Ana, CA 92705
Donna Drogos
file

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



04-14-03

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

April 11, 2003

Scott DeMuth
Sears, Roebuck & Co.
Department 824C, Building A2-281A
Hoffman Estates, IL 60179

Dear Mr. DeMuth:

Subject: Fuel Leak Case No. RO0000480, Sears Auto Center#1058B, 2600 Telegraph Ave., Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed "3rd Quarter Monitoring Report and Work Plan for Confirmation Soil Borings" dated January 23, 2003 prepared by URS Corporation. Contaminant concentrations followed historical and recent trends. Low concentrations or concentrations below detection limits continued to be found for monitoring wells MW-1, MW-4, MW-5, MW-6, MW-7, MW-8, and MW-9. However, MW-2 and EW-1 found low concentrations or concentrations below detection limits except Total Petroleum Hydrocarbons-Oil (TPH-o). Up to 6,100 microgram (ug/l) TPH-o was detected for MW-2 and up to 15,000 ug/l was detected for EW-1. MW-2's TPH-o concentrations have been below detection limits since May 2000. MW-3 historically contained separate phase hydrocarbons (SPH) or high TPH-o concentrations but since March 2002, TPH-o concentrations have decreased to low concentrations. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1) Proposed Boring Locations –
 - a) T7 – Location was previously sampled.
 - b) T5 - The report describing the removal of the tanks did not include T5 as one of those with poor integrity and holes. T6 was noted to have a cracked seam on its southwestern weld and the soil to the north and south of the tank was stained.
 - c) In the area of the gasoline tanks - We do not have a report describing the removal of these tanks. Please provide so that we can determine the locations previously sampled.

Please review the proposed sample locations. Modify and/or explain the choice of locations. Include your proposal in the Workplan Addendum requested below.

- 2) EW-1 – This extraction well is located adjacent to MW-3. MW-3 formerly contained SPH. Please indicate if EW-1 was ever used for extraction and if so, indicate when and details. Please report your results in the Soil and Water Investigation Report (SWI) Report requested below.

- 3) Groundwater Analyses – We request that you include analyses for 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). 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.
- 4) Historical Hydraulic Gradient – Please provide rose diagrams, which include cumulative groundwater gradients in all future reports submitted for this site.
- 5) Well Survey – List wells within a quarter mile radius of the site. Indicate which of these may be potential receptors. Please report your results in the Soil and Water Investigation Report (SWI) Report requested below.
- 6) Preferential Pathway Study – We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site. Of particular concern is the identification of abandoned wells and improperly-destroyed wells that can act as vertical conduits to deeper water bearing zones, pumping wells in the vicinity of your site, and manmade conduits for shallow migration. Discuss your analysis and interpretation of the results of the preferential pathway study (including the detailed well survey and utility survey requested below). Please include an evaluation of the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers.
An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Submittal of map(s) and cross-sections showing the location and depth of all utility lines and trenches within and near the site and plume area(s) is required as part of your study. Please report your results in the Soil and Water Investigation Report (SWI) requested below.

TECHNICAL REPORT REQUEST

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

ASAP – “4th Quarter 2002 Monitoring Report”

June 11, 2003 – Work Plan Addendum

60 days after Work Plan approval – Soil and Water Investigation Report

April 30, 2003 – “1st Quarter 2003 Monitoring Report”

Mr. DeMuth
April 11, 2003
Page 3 of 3

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. 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: J. S. Rowlands, URS Corp., 2020 E. 1st St., Suite D, Santa Ana, CA 92705
Donna Drogos
file

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



9-26-02

20480

September 25, 2002

STID 1082

Scott M. DeMuth
Sears Roebuck & Company
Department 824C, Building A2-281A
Hoffman Estates, IL 60179

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

Re: Former Sears Auto Center, (Gasoline Impact), 2600 Telegraph Ave., Oakland, CA 94612

Dear Mr. Scott M. DeMuth:

I am in receipt of "Second Quarter 2002, Groundwater Monitoring & Sampling Report" dated August 26, 2002, submitted by Mr. Kevin G. Russel of URS Corporation regarding the above referenced site. I have also discussed the case with Mr. Scott Rowland of URS Corporation. Please note the following comments:

- As before, the MW-3 well, down gradient, contained the highest concentration at 870ppb TPH-g, 1,026 TPH-D, and up to 2,000ppb TPH-motor Oil. This reveals a decrease for some of the constituents. The concentrations of Benzene and MTBE were noted at <1ppb, and <2 ppb respectively. This well had previously contained Separate-Phase Hydrocarbon (SPH).
- There was some oscillation in the concentration of EW-1 well, which is located down gradient of the former tanks. EW-1 well revealed <2,000ppb, 1,040ppb, <1ppb, and <2ppb of TPH-motor Oil, TPH-gasoline, Benzene, and MTBE.
- Per this report and figure 1 within this report, groundwater flow is almost southerly direction at 0.017 ft/ft.
- Depth to groundwater level was noted from 10.20 to 11.91 feet bgs.

Should you have any questions, please call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Eileen Brennan, 757 Arnold Dr., Suite D, Martinez, CA 94553
Mr. Scott Rowlands, URS Corporation, 2020 East First Street, Suite 400, Santa Ana, CA 92705
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



9-26-02

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

September 25, 2002

STID 1082

Scott M. DeMuth
Sears Roebuck & Company
Department 824C, Building A2-281A
Hoffman Estates, IL 60179

Re: Sears Auto Center, (Solvent impact) 1901-1911 Telegraph Ave., Oakland, CA 94612

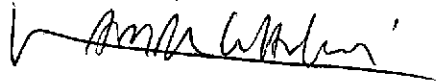
Dear Mr. Scott M. DeMuth:

I am in receipt of "2002 First Quarter Groundwater Monitoring" dated 5, 2002, submitted by Mr. J.S. Rowlands of URS Corporation, regarding the above referenced site. I have just completed review of this document and further discussed it with Mr. Scott Rowlands of URS Corporation. Per this document I have observed the following:

1. There were up to 500ppb, 6,400ppb, 34,000ppb, and up to 50ppb of MTBE, Benzene, TPHg, and 1,2-DCA respectively within MW-7 well. This well reflected the most contaminated well. Other constituents such as Oil and grease were detected at up to 500 ppb. MW-7 well also revealed up to 50ppb of PCE, TCE, 1, 2-DCA, cis-1,2-DCE, and 1,1-DCE.
2. Groundwater flow gradient is at 0.01 ft/ft with an easterly direction.
3. Depth to groundwater was noted from 12.43 to 16.50 during this episode.
4. Chlorinated VOC's have been observed upgradient (MW1) as well as downgradient (MW9) of the existing plume per Harding ESE investigation as referenced in IT Corp report dated May 2002.
5. Please ensure that a proper detection limit is used for all constituents in all wells.
6. Please provide an analytical table, which would reflect chronological data regarding the concentrations of the constituents with each report in order to reveal the concentration trend of the constituents.
7. You may install two additional monitoring well as discussed in order to delineate the existing plume at the site.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Amir K. Gholami". The signature is written in a cursive style and is positioned above a horizontal line.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Eileen Brennan, 757 Arnold Dr., Suite D, Martinez, CA 94553
Mr. Scott Rowlands, URS Corporation, 2020 East First Street, Suite 400, Santa Ana, CA
92705
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



2002

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

Alameda County

OCT 16 2002

September 25, 2002

STID 1082

Scott M. DeMuth
Sears Roebuck & Company
Department 824C, Building A2-281A
Hoffman Estates, IL 60179

Environmental Health

Re: Sears Auto Center, (Solvent impact) 1901-1911 Telegraph Ave., Oakland, CA 94612

Dear Mr. Scott M. DeMuth:

I am in receipt of "2002 First Quarter Groundwater Monitoring" dated 5, 2002, submitted by Mr. J.S. Rowlands of URS Corporation, regarding the above referenced site. I have just completed review of this document and further discussed it with Mr. Scott Rowlands of URS Corporation. Per this document I have observed the following:

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5. Please ensure that a proper detection limit is used for all constituents in all wells.
6. Please provide an analytical table, which would reflect chronological data regarding the concentrations of the constituents with each report in order to reveal the concentration trend of the constituents.
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If you have any questions, please call me at (510) 567-6876.

Sincerely,

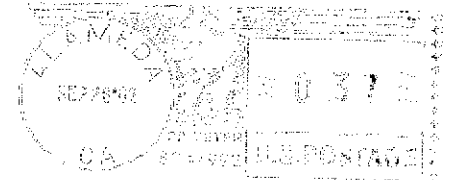
A handwritten signature in black ink, appearing to read "Amir K. Gholami". The signature is written in a cursive style and is underlined.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Eileen Brennan, 757 Arnold Dr., Suite D, Martinez, CA 94553
Mr. Scott Rowlands, URS Corporation, 2020 East First Street, Suite 400, Santa Ana, CA
92705
files



ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
 Environmental Health Services Administration
 1131 Harbor Bay Parkway, Suite 250
 Alameda, CA 94502-6577



- REASON CHECKED
- UNCLASIFIED
 - ADDRESS UNKNOWN
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 - NO SUITE STREET OR NUMBER
 - MOVED, BUT NO ADDRESS
 - MOVED, NOT FORWARDABLE

*Unknown person
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9453346326 40



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20480

September 24, 2002

STID 1082

Scott M. DeMuth
Sears Roebuck & Company
Department 824C, Building A2-281A
Hoffman Estates, IL 60179

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

Re: Former Sears Auto Center, (Gasoline Impact), 2600 Telegraph Ave., Oakland, CA 94612

Dear Mr. Scott M. DeMuth:

I am in receipt of "Second Quarter 2002, Groundwater Monitoring & Sampling Report" dated August 26, 2002, submitted by Mr. Kevin G. Russel of URS Corporation regarding the above referenced site. I have also discussed the case with Mr. Scott Rowland of URS Corporation. Please note the following comments:

- As before, the MW-3 well, down gradient, contained the highest concentration at 870ppb TPH-g, 1,026 TPH-D, and up to 2,000ppb TPH-motor Oil. This reveals a decrease for some of the constituents. The concentrations of Benzene and MTBE were noted at <1ppb, and <2 ppb respectively. This well had previously contained Separate-Phase Hydrocarbon (SPH).
- There was some oscillation in the concentration of EW-1 well, which is located down gradient of the former tanks. EW-1 well revealed <2,000ppb, 1,040ppb, <1ppb, and <2ppb of TPH-motor Oil, TPH-gasoline, Benzene, and MTBE.
- Per this report and figure 1 within this report, groundwater flow is almost southerly direction at 0.017 ft/ft.
- Depth to groundwater level was noted from 10.20 to 11.91 feet bgs.

Should you have any questions, please call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Eileen Brennan, 757 Arnold Dr., Suite D, Martinez, CA 94553
Mr. Scott Rowlands, URS Corporation, 2020 East First Street, Suite 400, Santa Ana, CA 92705
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



October 2, 2001

STID 1082

Scott M. DeMuth
Sears Roebuck & Company
Department 824C, Building A2-281A
Hoffman Estates, IL 60179

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

Re: Sears Auto Center, (Solvent impact) 1901-1911 Telegraph Ave., Oakland, CA 94612

Dear Mr. Scott M. DeMuth:

I have received and reviewed a document regarding "2001 First Quarter Groundwater Monitoring, Heating Oil UST formerly submitted by Mr. David A. Bero of It Corporation regarding the above referenced site. I have reviewed this document and understand that there were some errors, which was included in the above report. In my correspondence I had indicated that Groundwater flow was to the east at 0.01 ft/ft according to figure 1 within this report. However, per latest correction the report was wrong and that groundwater flow is to the southwest rather than northeast as illustrated and calculated previously. I am assuming that the remainder of the report is accurate. Per previous correspondence, please consider the following:

1. To avoid confusion, please always identify the site properly, since there are three different issues all at sears, which I am working on at the present time. Additionally Juliet Shin, my former colleague, no longer works at this office. Please forward all mail to my attention.
2. There were 3.1ppb, 3,400ppb, 4,400ppb, and 60ppb of MTBE, Benzene, TPHg, and 1,2-DCA respectively within MW-7 well, which is the most contaminant well. There are other contaminants such as Oil and grease of up to 1,000ppb revealed in other wells as well.
3. You might discontinue groundwater analysis of the wells, which historically and consistently have revealed ND or minute amount of contaminants in the past.

Please call me at (510) 567-6876, should you have any questions.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. David A. Bero, It Corporation, 4005 Port Chicago Highway, Concord, CA 94520
Ms. Eileen Brennan, 757 Arnold Dr., Suite D, Martinez, CA 94553
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



07-2507

20480

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

July 24, 2001

STID 1082

Scott M. DeMuth
Sears Roebuck & Company
Department 824C, Building A2-281A
Hoffman Estates, IL 60179

Re: Former Sears Auto Center, (Gasoline Impact), 2600 Telegraph Ave., Oakland, CA 94612

Dear Mr. Scott M. DeMuth:

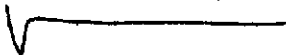
This office is in receipt of "Second Quarter 2001, Groundwater Monitoring & Sampling Report" dated June 4, 2001 submitted by Mr. David A. Bero of It Corporation regarding the above referenced site. Please consider the following:

- Groundwater flow is to the south at 0.02 ft/ft.
- Similar to previous report, none of the wells contained Separate-Phase Hydrocarbon (SPH) as it had been previously noted in MW-3 well. The amount of SPH has been estimated about five gallons due thickness of SPH in the past, and the fact that SPH has only been observed in MW-3 well, and that SPH no longer exists within this or any other well. In the past the product thickness historically has been found to be less than 0.05 foot in the MW-3 well. Vacuum extraction technique as well as placement of Soak-eze in MW-3 well, have been employed to remedy this situation. However recent sampling has revealed, no detectable amount of SPPH in the well. However, there was a rise of 0.3 foot in groundwater level as well correlating with this event in the past.
- None of the wells revealed any concentrations of Benzene.
- Groundwater levels were noticed at 10.4 to 12.3 ft below top of casing.
- The MW-3 well, down-gradient, contained the highest concentration as expected at 110,000ppb TPH-motor Oil and 4,100ppb TPH-gasoline. This also indicates an increase in concentration compared to the last analysis. This oscillation in concentration might be partly due to change in groundwater level periodically. EW-1 well also down-gradient of the former tanks revealed some oscillation in the concentrations of TPH-gasoline and TPH-motor Oil.
- Low concentrations of contaminants of contaminants including those of Benzene and MTBE were detected in other wells.

- As discussed previously this site can not be considered low-risk if there is still some sheen and or Separate-Phase Hydrocarbon (SPH) left within the well after recommended activity. While it is true that the sheen was not observed during the last two analysis, there is no certainty that the same trend might continue without further additional sampling of the wells periodically. Additionally, both soil and groundwater must be taken into account prior to closure considerations. Furthermore, a plume must also be stable or decreasing before a site can be considered for closure. The present plume in MW-3 is not stable but rather oscillating at this time. However, you may skip further analysis of the wells, which have historically and consistently revealed non-detect and or minute concentrations of the contaminants.

Should you have any questions, please call me at (510) 567-6876.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Eileen Brennan, 757 Arnold Dr., Suite D, Martinez, CA 94553
Mr. David A. Bero, It Corporation 4005 Port Chicago Highway, Concord, CA 94520-1120
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



July 24, 2001

STID 1082

Scott M. DeMuth
Sears Roebuck & Company
Department 824C, Building A2-281A
Hoffman Estates, IL 60179

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

Re: Sears Auto Center, (Solvent impact) 1901-1911 Telegraph Ave., Oakland, CA 94612

Dear Mr. Scott M. DeMuth:

I am in receipt of "First Quarter 2001, Groundwater Monitoring & Sampling Report" dated June 8, 2001 submitted by Mr. David A. Bero of It Corporation regarding the above referenced site. I have reviewed this report and would like to make the following comments:

- Please always identify this site to avoid confusion since there are three different issues all at sears, which I am working on at the present time. Additionally Juliet Shin, my former colleague, no longer works at this office. Please forward all mail to my attention.
- MW-7 is the most contaminant well with 3.1ppb, 3,400ppb, 4,400ppb, and 60ppb of MTBE, Benzene, TPHg, and 1,2-DCA respectively. There are other contaminants such as Oil and grease of up to 1,000ppb revealed in other wells as well.
- Groundwater flow was to the east at 0.01 ft/ft according to figure 1 within this report
- You may discontinue groundwater analysis of the wells, which historically and consistently have revealed ND or minute amount of contaminants.

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

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. David A. Bero, It Corporation, 4005 Port Chicago Highway, Concord, CA 94520
Ms. Eileen Brennan, 757 Arnold Dr., Suite D, Martinez, CA 94553
files

Scott M. DeMuth
Sears, Roebuck and Co.
3333 Beverly Road, A2-245A
Hoffman Estates, IL 60179

Sears, Roebuck and Co.

February 15, 2000

Mr. Amir K. Gholami, REHS
Hazardous Materials Specialist
Alameda County Health Care Services Agency
Environmental Health Services
Environmental Protection
1131 Harbor Bay Parkway
Alameda, CA 94502-6577

*Resp. work
2/22/2000
AT*

RE: STID 1082
Former Sears at 2633 Telegraph Road
Former Sears at 2600 Telegraph Road
Oakland

Dear Mr. Gholami:

Sears, Roebuck and Co. (Sears) received your letter of February 3, 2000, on February 9th. It appears your letter and my letter of February 4th may have crossed in the mail. This letter describes how there are two parcels involved under STID 1082.

Regarding your request regarding who should receive copies of correspondence, to reiterate from my February 4th letter:

Contact for the automotive center parcel (ongoing quarterly monitoring):

Dave Bero
IT Corporation
4005 Port Chicago Highway
Concord, CA 94520-1120

Contact for the retail store parcel (heating oil underground storage tank investigation):

Taras Kruk
Dames & Moore
6 Hutton Centre Drive, Suite 700
Santa Ana, CA 92707

00 FEB 17 AM 11:15
ENVIRONMENTAL
PROTECTION

February 15, 2000
Page 2

As mentioned in my letter, the same STID number appears to apply to both parcels. Please let me know if you have any questions regarding these cleanups.

Sincerely,
Sears, Roebuck and Co.

A handwritten signature in black ink, appearing to read "S. DeMuth". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Scott M. DeMuth
Manager, Environmental Technical Services

Cc: Taras Kruk, Dames & Moore
Dave Bero, IT Corporation

Fax Transmittal

File Review Request

Mountain View Office
405 Clyde Avenue
Mountain View, CA 94043
Tel: 650.967.2365
Fax: 650.967.2785

Oakland Office
129 Filbert Street
Oakland, CA 94607
Tel: 510.267.1970
Fax: 510.267.1972

Pleasanton Office
2150 Rheem Drive, Suite E
Pleasanton, CA 94588
Tel: 510.462.7808
Fax: 510.462.8346

To: Alameda County - Environmental Health
Attn: REVIEW REQUEST (Marilyn Wilcher)
Fax: 510-337-9335
CC: CORRECTED REQUEST

From: Joyce C. Marsh
Date: 3/11/98
Pages: 1 (Including Cover)
Project: Telegraph Ave - Oakland
Job #: 1328-1

Please notify us if you received this fax in error by calling the office indicated above.

Remarks: Urgent For your review Reply ASAP Please comment

We have been retained to perform a Phase I preliminary environmental site assessment of a property located in Oakland and would like to review files for the following address;

2633 Telegraph Avenue, Oakland, CA

Seam, TP 5110 10 82

2615 Telegraph Avenue, Oakland, CA

No Review

Historical address of:

all seams

501, 527, 541, 547, 553, 559 - 27th Street, Oakland, CA
518 Sycamore Street, Oakland, CA

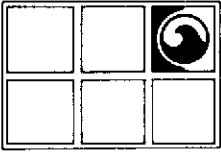
We are primarily concerned with hazardous materials storage, handling, and/or usage on-site. However, all files are of interest. Attached is a site map for your information.

As we discussed 3/11 AM, an appointment to review your files is set for me on **March 18, 1998, between 8 am - 12 noon.** If you have any questions, please call and I will be glad to help you..

Thank you.

Joyce Marsh
Sr. Technical Assistant
ext 200
Oakland.doc

Mail copy to follow: Yes No Time Sent: _____ Sent By: _____



GROUNDWATER TECHNOLOGY®

Groundwater Technology, Inc.

4057 Port Chicago Highway, Concord, CA 94520 USA
Tel: (510) 671-2387 Fax: (510) 685-9148

November 18, 1994

Mr. Thomas Peacock
Alameda County Health Care Services Agency
80 Swan Way, Room 200
Oakland, California 94621

Subject: Former Sears Automotive Center
Facility No. 1058
2633 Telegraph Avenue, Oakland, California
GTI Project 020204554

Dear Mr. Peacock:

This letter is in response to your letter to Sears, Roebuck and Co., dated September 20, 1994. In that letter, you indicated that, in the Quarterly Monitoring and Sampling Report dated August 2, 1994, there was a comment about measurable thickness of separate-phase hydrocarbons in well MW-3 but that it was not monitored.

In that quarterly report, it was incorrectly reported on Table 1 that separate-phase was not measured in well MW-3. Upon reviewing the field notes for the June 30, 1994, monitoring event, well MW-3 was gauged, and separate-phase hydrocarbons were measured. On June 30, the depth-to-water measurement was 12.84 feet below top-of-casing, and the depth-to-product measurement was 12.82 feet below top-of-casing. The difference in the two readings indicates a **product thickness of 0.02 feet**.

The historical gauging measurements for well MW-3 will be corrected in future quarterly reports. Please contact me at (510) 671-2387 or Bernadine Palka at (708) 286-8864 if you have any questions about the above information.

Sincerely,
Groundwater Technology, Inc.

Michael J. Wray
Project Manager

c: Bernadine Palka, Sears, Roebuck and Co.

SRS/OK111894.LTR

HINSHAW & CULBERTSON

CHICAGO, ILLINOIS
BELLEVILLE, ILLINOIS
BLOOMINGTON, ILLINOIS
JOLIET, ILLINOIS
LAKE FOREST, ILLINOIS
LISLE, ILLINOIS
PEORIA, ILLINOIS
BROOKFIELD, WISCONSIN

4343 COMMERCE COURT
SUITE 415
LISLE, ILLINOIS 60532
708.505.0010
TELEFAX 708.505.0959

SPRINGFIELD, ILLINOIS
CHAMPAIGN, ILLINOIS
WAUKEGAN, ILLINOIS
BOCA RATON, FLORIDA
MIAMI, FLORIDA
ST. LOUIS, MISSOURI
APPLETON, WISCONSIN
MT. WAUKER, WISCONSIN

TELECOPIER TRANSMISSION

DATE: October 3, 1994 FILE #: _____

NAME: Thomas Peacock, Supervising HMS, Hazardous Material Div.

COMPANY: Alameda County Health Care Services Agency

TELECOPIER NUMBER: 510-337-9335

RE: Former Sears Automotive Center, Telegraph Rd., Oakland

FROM: William J. Ulrich, Jr.

COMMENTS: Letter dated 9/30/94

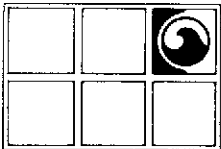
TOTAL NUMBER OF PAGES (Including this Cover Sheet): 3

IF THE COPIES YOU RECEIVE ARE INCOMPLETE OR ILLEGIBLE,
PLEASE CALL (708) 505-0010 AND ASK FOR Sherri Nagy.

Original will follow.
Original will not follow.

IMPORTANT - THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED, AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE TO DELIVER IT TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT READING, DISSEMINATING, DISTRIBUTING OR COPYING THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE, AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU.

R0480
ST10
1082



**GROUNDWATER
TECHNOLOGY, INC.**

4057 Port Chicago Highway, Concord, CA 94520 (415) 671-2387

FAX: (415) 685-9148

March 24, 1993

Project No. 020503392

Mr. Scott O. Seery
Senior Hazardous Materials Specialist
Alameda County Health Care Services Agency
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621


RE: SOIL AND GROUNDWATER INVESTIGATION
Sears, Roebuck & Co. Facility
2633 Telegraph Avenue
Oakland, California

Dear Mr. Seery:

On behalf of Sears, Roebuck & Co., The enclosed Phase II Assessment Report for the site referenced above is being submitted for your review. The report contains the results of subsurface assessment that was conducted during December 1992 and recommendations for additional delineation of the impacted soil and groundwater.

If you have any questions regarding the report, please contact either Ms. Bernadine Palka at (708) 286-8864, or me at (510) 671-2387.

Sincerely,
Groundwater Technology, Inc.


MICHAEL J. WRAY
Project Manager

Coord.
Chris Carpenter
case -

enclosure

cc: Ms. Bernadine Palka, Sears, Roebuck & Co.

SRS/PHS2ASMT.LTR

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

October 7, 1992

STID 1082

Ms. Bernadine Palka
Sears, Roebuck, and Company
Sears Tower
Department 824C BSC36-20
Chicago, Illinois 60684

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

RE: SOIL AND GROUND WATER INVESTIGATION - SEARS AUTOMOTIVE
CENTER, 2633 TELEGRAPH AVENUE, OAKLAND, CALIFORNIA

Dear Ms. Palka:

The Department has completed review of the August 28, 1992 Groundwater Technology, Inc. (GTI) Soil and Groundwater Investigation Work Plan. Our review was performed in context with the 10 August 1990 Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, the State Water Resources Control Board Leaking Underground Fuel Tank (LUFT) Field Manual, and Article 11 of Title 23, California Code of Regulations.

The referenced GTI work plan has been approved for this phase of work at the site with the following changes/additions:

- 1) So that the Department may clearly understand the proposed sample analyses methods, please adhere to the following list of target compounds/methods for both soil and ground water for the designated well(s):

- | | |
|-------------------------|---|
| MW-1 | o Total petroleum hydrocarbons as diesel (TPH-D):
DHS or LUFT method |
| | o Total oil and grease (TOG): EPA 5520 series |
| | o Benzene, toluene, ethylbenzene, total xylenes
(BTEX): EPA 8020 or 8240 |
| MW-2
through
MW-4 | o TPH as gasoline (TPH-G): DHS or LUFT method |
| | o TPH-D: DHS or LUFT method |
| | o Halocarbons: EPA 8010 or 8240 |
| | o BTEX: EPA 8020 or 8240 |
| | o TOG: EPA 5520 series |
| | o Total lead (Pb): ICAP or AA |
| | o Semivolatile organic compounds (SVOC): EPA
8270* |
| MW-5 | o As directly above, plus the additional metals
Cd, Cr, Ni, and Zn (no change other than SVOC) |

Ms. Bernadine Palka
RE: Sears Automotive, 2633 Telegraph Ave.
October 7, 1992
Page 2 of 3

* Note: SVOCs have not yet been sought even though such analysis is required by the RWQCB during waste oil tank leak investigations.

- 2) Well seals are to be allowed to set up a minimum of 72 hours prior to development should mechanical development methods be used.
- 3) Purging/sampling shall not occur for a minimum period of 24 hours, and preferably 72 hours, after well development. Purging adequacy shall be based on the monitoring and stabilization of the field parameters of electrical conductivity, temperature, and pH.
- 4) Soil samples shall be collected in an "undisturbed" fashion using standard California-modified split spoon samplers, or comparable method, driven ahead of the drill auger. The samplers shall be fitted with minimum 1 x 3" brass or stainless steel cylinders. Such split spoon samplers are typically 18" long, and retain three (3) 2 x 6" cylinders, one of which is immediately sealed and placed on ice pending analyses. The other two cylinders are generally used for field screening and lithologic determinations.

The proposed continuous coring technique, described in Section 5.2.2 of the GTI work plan, does not accommodate the need to collect "undisturbed" samples, as required. This should not, however, preclude continuous coring in additional borings if necessary for lithologic logging.

- 5) Wells are to be surveyed to the accuracy of 0.01 foot relative to mean sea level (MSL).
- 6) Water sample QA/QC programs must include field duplicates and trip blanks for VOC analyses. Please reference Section E of Appendix D, LUFT Field Manual, pages A30 - A35.
- 7) A Site Health and Safety Plan must be developed which complies with the requirement set forth under 29CFR Part 1910.120.

Additionally, in correspondence dated February 11, 1992, Mr. Paul Smith of this Department requested documentation supporting the proper disposition of the stockpiled soil generated as a result of the September 1990 tank closures at this site. Initial sample

Ms. Bernadine Palka
RE: Sears Automotive, 2633 Telegraph Ave.
October 7, 1992
Page 3 of 3

results indicate these soils were highly contaminated with petroleum hydrocarbons (up to 6,800 ppm TOG), detectable concentrations of TCA, and elevated total lead. Such documentation would include manifests/bills-of-lading, as appropriate, additional sample results (e.g., 22CCR WET), chain-of-custody forms, disposal receipts from landfills, etc., etc. To date, no such documents have yet been submitted.

Further, the referenced letter also indicates that the former motor oil tank site on the east side of the facility requires additional assessment. The current GTI work plan does propose to install one well in this area, but no additional assessment of potential soil contamination beyond the well installation has been proposed in the current plan. We understand, however, that some limited overexcavation of the motor oil tank 5/6 pit occurred on November 11, 1990, and samples were collected. The analyses results for these samples have yet to be submitted. You are advised that these results, with proper sample documentation, could provide the missing information lacking in the present assessment of this area of the site. Should these results not be made available to this Department, additional evaluation of this area will be required.

At this time, please adhere to a monthly schedule of water elevation monitoring for 12 consecutive months, reduced to a quarterly schedule thereafter. Water samples are to be collected and analyzed quarterly.

Please notify this office when field work is scheduled to begin. We expect that such field work will be initiated within 45 days of the date of this letter. A report documenting the results of this phase of the investigation is due within 60 days of the completion of field activities. Subsequent reports are due quarterly until this case is eligible for closure.

Please contact me at 510/271-4530 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Chris Carpenter, Alameda County District Attorney's Office
Eddy So, RWQCB
Michael Wray, Groundwater Technology, Inc.

8/91 Phase I/II report AEMC

- 6 ECP soundings to 36 feet BG
 - 11 borings (only from 7 were soil samples collected)
TPH-D/G, TOG, metals (Pb); no VOCs run
 - 7 GW samples collected
TPH-D/G, TOG; no UOC or metals run
- ∴ no soil samples from below 15' BG

SOIL

B-7, 8, 9, 10, 11	high Toluene
B-9, 11, 1, 2	high TOG
B-1, 2, 8, 10, 11	detectable TPH-G

Note: AEMC proposal said 15 ECP
15 borings for soil samples

Depth to GW??

No VOCs run

" metals "

No 8270 (although not proposed)

2/92 Letter from PS

- needs docs supporting stack pile soil disposal
- wants GW/soil analyses in proposed wells to be analyzed for missing analytes
- wants wp for E UST pit delineation

using ESE

ESE countersuing Minnesota

- * ① What happened to soil stock piles (reference PS 2/11/92 later)
- * ② Sample results from overexcavation of UST 5/6 on 11/6/90.

ADD

① 8270 for MW-2 → 4

TPH-D } MW-1
TOC }

~~② samples also to be collected at lith; ^{SITE} ~~cont~~~~

③ Survey to USL

④ Purging adequacy, pH conduct, temp
24 hours

⑤ development ~ 72 hours after const.

⑥ Soil samples shall be collected undisturbed
by driving sampler ahead of auger
- no samples from cores. - 5.2.2

⑦ QA/QC duplicates for VOCs
trip blanks to be analyzed

⑧ H+S Plan

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

Certified Mailer # P 062 127 760

January 30, 1991

Ms. Bernadine Palka
Sears, Roebuck & Co.
Sears Tower
Dept. 731, BSC 39-34
Chicago, Illinois 60684

**RE: Remediation Workplan for Sears Automotive Repair
2633 Telegraph Ave., Oakland, 94621**

Dear Ms. Palka:

Our office has received and evaluated the contamination assessment workplan dated January 4, 1991, for the waste oil tank site, prepared by American Environmental Management Corporation (AEMC). The plan proposes to conduct an electronic cone penetrometers survey (ECP) in conjunction with a retractable cone tipped sampler for soil sampling, and hydropunch for water sampling.

The proposal states that if all groundwater samples taken with the hydropunch are below action levels, AEMC will not install monitoring wells. This concept as proposed is unacceptable to this office.

In accordance with the August 10, 1990 San Francisco Regional Water Quality Control Boards Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites a groundwater investigation is required when, among other indicators, the initial soil sampling levels of 100 ppm or above of Total Petroleum Hydrocarbons or Oil and Grease are encountered. The RWQCB does not recognize the use of quantitative data derived from the use of a hydropunch as representative of the hydrologic regime because it has not been obtained from a properly screened and developed monitoring well.

You are requested to re-submit a proposed workplan which would address the groundwater monitoring requirement in the former waste oil tank area and also in the former motor oil tank excavation area.

Ms. Palka
January 30, 1991
Page 2 of 2

I have discussed the content of this letter with Mr. Phil Walsak representing AEMC.

Please respond to the above request within 30 days of the receipt of this letter. If you have any questions regarding this letter please do not hesitate to contact me at 415/271-4320.

Sincerely,

Paul M. Smith

Paul M. Smith
Hazardous Materials Specialist

cc:

Phil Walsak, AEMC
Gary Phipps, Sears Automotive, Oakland
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Affairs
Lester Feldman, RWQCB
Howard Hatayama, DHS

15

P 062 127 760

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to	
Street and No	
P.O. State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Postnet Delivery Fee	
Return Receipt (showing number and Day Delivered)	
Return Receipt (showing Date and Address of Delivery)	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3800, June 1983

white -env.health
 yellow -facility
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
 Oakland, CA 94621
 (415) 271-4320

Hazardous Materials Inspection Form

II, III

Site ID # _____ Site Name Lube oil pit (6 tanks) Today's Date 11/15/90

II.A BUSINESS PLANS (Title 19)

- 1. Immediate Reporting 2703
- 2. Bus. Plan Stds. 25503(b)
- 3. RR Cars > 30 days 25503.7
- 4. Inventory Information 25504(a)
- 5. Inventory Complete 2730
- 6. Emergency Response 25504(b)
- 7. Training 25504(c)
- 8. Deficiency 25505(a)
- 9. Modification 25505(b)

Site Address 2633 Telegraph Ave

City Oakland Zip 94612 Phone _____

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

II.B ACUTELY HAZ. MATLS

- 10. Registration Form Filed 25533(a)
- 11. Form Complete 25533(b)
- 12. RMPP Contents 25534(c)
- 13. Implement Sch. Req'd? (Y/N)
- 14. OnSite Conseq. Assess. 25524(c)
- 15. Probable Risk Assessment 25534(d)
- 16. Persons Responsible 25534(g)
- 17. Certification 25534(i)
- 18. Exemption Request? (Y/N) 25536(b)
- 19. Trade Secret Requested? 25538

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments: 1:15 pm onsite 2:20 left site

III. UNDERGROUND TANKS (Title 23)

- General
- 1. Permit Application 25284 (H&S)
 - 2. Pipeline Leak Detection 25292 (H&S)
 - 3. Records Maintenance 2712
 - 4. Release Report 2651
 - 5. Closure Plans 2670

- Monitoring for Existing Tanks
- 6. Method
 - 1) Monthly Test
 - 2) Daily Vadose
 - Semi-annual groundwater
 - One time soils
 - 3) Daily Vadose
 - One time soils
 - Annual tank test
 - 4) Monthly Gndwater
 - One time soils
 - 5) Daily Inventory
 - Annual tank testing
 - Cont pipe leak det
 - Vadose/gndwater mon.
 - 6) Daily Inventory
 - Annual tank testing
 - Cont pipe leak det
 - 7) Weekly Tank Gauge
 - Annual tank testing
 - 8) Annual Tank Testing
 - Daily Inventory
 - 9) Other _____

- 7. Precs Tank Test 2643
 - Date: _____
- 8. Inventory Rec. 2644
- 9. Soil Testing 2646
- 10. Ground Water. 2647

- New Tanks
- 11. Monitor Plan 2632
 - 12. Access, Secure 2634
 - 13. Plans Submit 2711
 - Date: _____
 - 14. As Built 2635
 - Date: _____

Area 5/6 b excavation - removed slab
Sample 5/6 c taken underneath mid slab #5
Sample 6 B taken SW of cement lab to be outside/underneath
of tank pit from tank 6 at approx 2' below where the
slab was.

between tank 1 & 2 initial sample results of
80 ppm TOG were encountered
over excavation occurred to a depth of 3'
a confirming sample was then taken

Rev 8/88

II, III

Contact: _____

Title: _____

Signature: _____

Inspector: f. Smith

Signature: _____

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

November 8, 1990

Ms. Bernadine Palka
Sears, Roebuck & Co.
Sears Tower
Dept. 731, BSC 39-34
Chicago, Illinois 60684

**RE: Remediation Workplan for Sears Automotive Repair
2633 Telegraph Ave, Oakland, 94621**

Dear Ms. Palka:

This is a follow up letter to the workplan for site remediation of the motor oil tank area workplan submitted by American Environmental dated November 2, 1990 and also to the phone conversation I had with Mr. Phil Walsak with American Environmental on November 7, 1990.

We request that a more elaborate work plan be submitted to this office for review and approval before proceeding with remedial action at this site. The revised work plan should include but not be limited to include the following information:

A plan which addresses specific areas where over excavation of subsurface contaminated soil will occur.

A plan which will address how excavated soil will be sampled, analyzed, stored, transported, and treated or disposed of.

A plan which addresses proposed measures to determine if groundwater has been impacted.

Either a phased approach which will deal with contamination of soil and the potential impact to groundwater in separate reports, or one which proposes to perform investigative work on both of these media within the same plan are acceptable to this office.

The attached document includes an approved format from the San Francisco Regional Water Quality Control Boards; Tri-Regional Staff Recommendations for a work plan. A copy has been submitted to American Environmental via facsimile **Please provide a revised work plan to this office within 30 days of the receipt of this letter.**

Ms. Palka
November 8, 1990
Page 2 of 2

If you have any questions please direct them to me at (415) 271-4320.

Sincerely,

Paul M. Smith

Paul M. Smith
Hazardous Materials Specialist

cc:

Phil Walsak, American Environmental
Gary Phipps, Sears Automotive
Gil Jensen, Alameda County District Attorney's Office
Howard Hatayama, Department of Health Services
Lester Feldman, S.F. Regional Water Quality Control Board

white -env.health
 yellow -facility
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Inspection Form

80 Swan Way, #200
 Oakland, CA 94621
 (415) 271-4320

II, III

Site ID # _____ Site Name Sears Today's Date 9/19/90

II.A BUSINESS PLANS (Title 19)

- ___ 1. Immediate Reporting 2703
- ___ 2. Bus. Plan Stds. 25503(b)
- ___ 3. RR Cars > 30 days 25503.7
- ___ 4. Inventory Information 25504(a)
- ___ 5. Inventory Complete 2730
- ___ 6. Emergency Response 25504(b)
- ___ 7. Training 25504(c)
- ___ 8. Deficiency 25505(a)
- ___ 9. Modification 25505(b)

Site Address 2633 Telegraph Ave

City _____ Zip 94 Phone _____

___ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- ___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- ___ II. Business Plans, Acute Hazardous Materials
- ___ III. Underground Tanks

onsite 2:15 pm offsite 6:10 pm

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

II.B ACUTELY HAZ MATLS

- ___ 10. Registration Form Filed 25533(a)
- ___ 11. Form Complete 25533(b)
- ___ 12. RMPP Contents 25534(c)
- ___ 13. Implement Sch. Req'd? (Y/N)
- ___ 14. OffSite Conseq. Assess. 25524(c)
- ___ 15. Probable Risk Assessment 25534(d)
- ___ 16. Persons Responsible 25534(g)
- ___ 17. Certification 25534(f)
- ___ 18. Exemption Request? (Y/N) 25536(b)
- ___ 19. Trade Secret Requested? 25538

III. UNDERGROUND TANKS (Title 23)

- | | |
|-------------------------------|--|
| General | ___ 1. Permit Application 25284 (H&S) |
| | ___ 2. Pipeline Leak Detection 25292 (H&S) |
| | ___ 3. Records Maintenance 2712 |
| | ___ 4. Release Report 2651 |
| | ___ 5. Closure Plans 2670 |
| Monitoring for Existing Tanks | ___ 6. Method |
| | 1) Monthly Test |
| | 2) Daily Vadose
Semi-annual groundwater
One time soils |
| | 3) Daily Vadose
One time soils
Annual tank test |
| | 4) Monthly Groundwater
One time soils |
| | 5) Daily Inventory
Annual tank testing
Cont pipe leak det
Vadose/groundwater mon. |
| | 6) Daily Inventory
Annual tank testing
Cont pipe leak det |
| | 7) Weekly Tank Gauge
Annual tank testing |
| | 8) Annual Tank Testing
Daily inventory |
| | 9) Other _____ |
| New Tanks | ___ 7. Precs Tank Test 2643 |
| | Date: _____ |
| | ___ 8. Inventory Rec. 2644 |
| | ___ 9. Soil Testing . 2646 |
| ___ 10. Ground Water. 2647 | |
| ___ 11. Monitor Plan 2632 | |
| ___ 12. Access. Secure 2634 | |
| ___ 13. Plans Submit 2711 | |
| Date: _____ | |
| ___ 14. As Built 2635 | |
| Date: _____ | |

Comments:

(1) 1000 gal waste oil
 visible contamination at top of tank in soil around
 fill end of inlet pipe.

bottom of tank pit fill material had obvious contamination
 4 x 12' cement slab at bottom of tank pit
 samples taken 1 at sw end of tank next to
 where the fill pipe was
 Another sample was taken at ~~E~~ side of tank
 excavation ~~where~~ next to service bays
 Sample # 1 SW side tank #6 pad
 2 inbetween T5 & T6
 3 SW side T5 & T6
 4 in between T3 & T4 in between 4 & 5
 5 in between T2 & T3
 6 in between T1 & T2
 7 N End of T1 #
 8 W End of T1

See reverse side

II, III

Contact: _____

Title: _____

Signature: _____

Inspector: Paul Driscoll

Signature: _____

logistically the sampling of the pipelines going into & underneath the building was infeasible at the time of the tank removal. In the phase 2 lab results/workplan pipeline testing ie borings will be specified

There is a pipeline going into the building from the waste oil tank also

Stockpile # 1 SW end next to tank pit (6)

took 10 samples tubes

made 5 samples composite

Stockpile # 2 N end

4 tubes

2 samples

waste oil stockpile

4 tubes

2 samples

ALAMEDA COUNTY, DEPARTMENT OF
ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

II, III

white - env. health
yellow - facility
pink - files

Site ID # _____ Site Name _____ Other Address _____ Today's Date 9/19/90

Site Address _____

City _____ Zip _____ Phone _____

MAX AMT stored > 500 lbs, 55 gal., 200 dtg? None

Inspection Categories:

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

(1) 100 gal waste pit
insulate contamination of tank #5
fill with concrete pipe. add N
Wagon 5
Bottom of tank pit fill material had obvious center
4 x 12' concrete slab adjacent to tank pit
Samples taken 1 at south end of tank next to
where the fill pipe was exposed
Another sample was taken at East side of tank
excavation where next to service bays
Sample # 1 SW side tank #6 had
2 between T 5 T 6
3 SW side T 5 T 6
4 5 between T 3 T 4
6 between T 2 T 3
7 between T 1 T 2
8 SW side T 1 T 2
9 SW side T 1
on reverse side

II.A BUSINESS PLANS (Title 19)

- 1. Immediate Reporting 2703
- 2. Bus. Plan Stds. 25503(b)
- 3. RR Regs > 30 days 25503.7
- 4. Inventory Information 25504(a)
- 5. Inventory Complete 2730
- 6. Emergency Response 25504(b)
- 7. Training 25504(c)
- 8. Deficiency 25505(a)
- 9. Modification 25505(b)

II.B ACUTELY HAZ. MATLS

- 10. Registration Form Filed 25533(a)
- 11. Form Complete 25533(b)
- 12. RMPP Contents 25534(c)
- 13. Implement Sch. Req'd? (Y/N)
- 14. OffSite Conseq. Assess. 25524(c)
- 15. Probable Risk Assessment 25534(d)
- 16. Persons Responsible 25534(g)
- 17. Certification 25534(f)
- 18. Exemption Request? (Y/N) 25536(b)
- 19. Trade Secret Requested? 25538

III. UNDERGROUND TANKS (Title 23)

- General
- 1. Permit Application 25284 (H&S)
 - 2. Pipeline Leak Detection 25292 (H&S)
 - 3. Records Maintenance 2712
 - 4. Release Report 2651
 - 5. Closure Plans 2670

- Monitoring for Existing Tanks
- 6. Method
 - 1) Monthly Test
 - 2) Daily Vadose
Semi-annual groundwater
One time soils
 - 3) Daily Vadose
One time soils
Annual tank test
 - 4) Monthly Groundwater
One time soils
 - 5) Daily Inventory
Annual tank testing
Cont pipe leak det
Vadose/gndwater mon.
 - 6) Daily Inventory
Annual tank testing
Cont pipe leak det
 - 7) Weekly Tank Gauge
Annual tank testing
 - 8) Annual Tank Testing
Daily Inventory
 - 9) Other _____

- 7. Precs Tank Test 2643
Date: _____
- 8. Inventory Rec. 2644
- 9. Soil Testing 2646
- 10. Ground Water 2647

- New Tanks
- 11. Monitor Plan 2632
 - 12. Access. Secure 2634
 - 13. Plans Submit
Date: _____ 2711
 - 14. As Built 2635
Date: _____

II, III

Contact: _____

Title: _____

Signature: _____

Inspector: _____

Signature: _____

white -env.health
 yellow -facility
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH
 Hazardous Materials Inspection Form

80 Swan Way, #200
 Oakland, CA 94621
 (415) 271-4320

II, III

Site ID # _____ Site Name Sears Automotive Today's Date 6/18/90

II.A BUSINESS PLANS (Title 19)

- ___ 1. Immediate Reporting 2703
- ___ 2. Bus. Plan Stds. 25503(b)
- ___ 3. RR Cars > 30 days 25503.7
- ___ 4. Inventory Information 25504(a)
- ___ 5. Inventory Complete 2730
- ___ 6. Emergency Response 25504(b)
- ___ 7. Training 25504(c)
- ___ 8. Deficiency 25505(a)
- ___ 9. Modification 25505(b)

Site Address 2633 Telegraph

City Oakland Zip 94612 Phone _____

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- ___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- ___ II. Business Plans, Acute Hazardous Materials
- ___ III. Underground Tanks

11:45 am left office 6:10 left site

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

II.B ACUTELY HAZ. MATLS

- ___ 10. Registration Form Filed 25533(a)
- ___ 11. Form Complete 25533(b)
- ___ 12. RMPP Contents 25534(c)
- ___ 13. Implement Sch. Req'd? (Y/N)
- ___ 14. OffSite Conseq. Assess. 25524(c)
- ___ 15. Probable Risk Assessment 25534(d)
- ___ 16. Persons Responsible 25534(g)
- ___ 17. Certification 25534(f)
- ___ 18. Exemption Request? (Y/N) 25536(b)
- ___ 19. Trade Secret Requested? 25538

III. UNDERGROUND TANKS (Title 23)

- | | |
|-------------------------------|--|
| General | ___ 1. Permit Application 25284 (H&S) |
| | ___ 2. Pipeline Leak Detection 25292 (H&S) |
| | ___ 3. Records Maintenance 2712 |
| | ___ 4. Release Report 2651 |
| | ___ 5. Closure Plans 2670 |
| | ___ 6. Method |
| | 1) Monthly Test |
| | 2) Daily Vadose |
| | Semi-annual groundwater |
| | One time soils |
| Monitoring for Existing Tanks | 3) Daily Vadose |
| | One time soils |
| | Annual tank test |
| | 4) Monthly Gndwater |
| | One time soils |
| | 5) Daily Inventory |
| | Annual tank testing |
| | Cont pipe leak det |
| | Vadose/gndwater mon. |
| | 6) Daily Inventory |
| Annual tank testing | |
| Cont pipe leak det | |
| 7) Weekly Tank Gauge | |
| Annual tank testing | |
| 8) Annual Tank Testing | |
| Daily inventory | |
| 9) Other _____ | |
| New Tanks | ___ 7. Precs Tank Test 2643 |
| | Date: _____ |
| | ___ 8. Inventory Rec. 2644 |
| | ___ 9. Soil Testing 2646 |
| | ___ 10. Ground Water 2647 |
| | ___ 11. Monitor Plan 2632 |
| | ___ 12. Access. Secure 2634 |
| | ___ 13. Plans Submit 2711 |
| | Date: _____ |
| | ___ 14. As Built 2635 |
| Date: _____ | |

Comments:

(5) 1000 gal UST
 (1) 2000
 Tanks inverted Gary Collins on scene
 no water in tank pit
 Tom Anckner Project supervisor American Env.
 Check on backfill w/ asphalt
 Tank 6 had visible oil in pit
 2 holes in seam of #6
 Tank 5 no visible holes
 (6) 12' x 24' concrete slabs were encountered underneath
 each tank - ^{soil} samples were taken in between these pits and
 on lean outside portion of pad
 Tank #1 has a hole
 holes in # 2, 4, 5, 6

II, III

Contact: _____

Title: _____

Signature: _____

Inspector: _____

Signature: _____

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

DEPARTMENT OF ENVIRONMENTAL HEALTH
430 - 21st Street, 11th Floor
Oakland, CA 94612
Telephone: (415) 271-4320

These plans have been reviewed and found to be acceptable and essentially meet the requirements of the local health law. Changes to your plans are suggested. Department are to ensure compliance with all applicable laws. The project proposed herein is in accordance with any required building permits or other requirements. One copy of these approved plans must be made available to all contractors and subcontractors involved in the removal.

Any change or alterations of these plans must be submitted to this Division and approved by the Building Inspection Dept. before any work is done. Please meet the health department clerk to discuss the plans. Notify this Department at least 48 hours before following required inspections.

R. Smith - Removal of tank and
Sampling
Final air test
Presence of a permit to operate is required for all areas with accepted plans and other conditions.

UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

1. Business Name Sears Automotive Facility
Business Owner Sears, Roebuck and Company
2. Site Address 2633 Telegraph Ave
City Oakland, Ca Zip 94612 Phone 415-444-4500
3. Mailing Address Sears Tower Dept.731 BSC 39-34
City Chicago, Illinois Zip 60684 Phone 312-875-8864
4. Land Owner Sears, Roebuck and Company
Address same as mailing address City, State _____ Zip _____
5. EPA I.D. No. CAC000518208 (good for 90 days from 9-11-90)
6. Contractor American Environmental Management Corporation
Address 9719 Lincoln Village Dr. Suite 501
City Sacramento, Ca 95827 Phone 916-364-8872
License Type C ID# 464159
7. Consultant American Environmental
Address same as contractor
City _____ Phone _____

8. Contact Person for Investigation

Name James F. Frumm Title Regional Manager
Phone 916-364-8872

9. Total No. of Tanks at facility 7

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

11. State Registered Hazardous Waste Transporters/Facilities

a) Product/Waste Tranporter

Name Evergreen Environmental Services EPA I.D. No. CAD980695761 415-795-4400
Address 6880 Smith Ave
City Newark State CA Zip 94560

b) Rinsate Transporter

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

c) Tank Transporter

Name American Environmental EPA I.D. No. CAD980884183
Address 9719 Lincoln Village Dr #501
City Sacramento, Ca State _____ Zip 95827

d) Tank Disposal Site

Name Erikson Inc EPA I.D. No. CAD009466392
Address 255 Parr Blvd 415-235-1393
City Richmond State Ca Zip 94801

e) Contaminated Soil Transporter

Name American Environmental EPA I.D. No. see above
Address 9719 Lincoln Village Dr #501
City Sac. State Ca Zip 95827

Name Geologist from the Engineering Division
 Company American Environmental Management Corporation
 Address 9719 Lincoln Village Dr #501
 City Sacramento State Ca Zip 95827 Phone 916-364-8872

13. Sampling Information for each tank or area

Tank or Area		Material sampled	Location & Depth
Capacity	Historic Contents (past 5 years)		
2,000	Oil but not used within the past 5 years	Soil	under tank
1,000	Waste Oil	Soil	under tank
5-1,000	Oil but not used in the past 5 years	Soil	under each tank

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

If yes, describe. all associated piping will be removed and manifested offsite

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

If yes, describe. 20 lbs dry ice / 1000 gallon
 Tanks will be cleaned at Erikson in Richmond

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

16. Laboratories

Name American Environmental Analytical Laboratories
 Address 3249 Fitzgerald Road
 City Rancho Cordova State Ca Zip 95742
 State Certification No. # 210

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Number
Fuel Oil Waste Oil Lube Oil Turns TPH (d) BTXG Oil + Gr. Waste Oil TPH (G) TPH (O) BTXG Oil + Gr. (4) Heavy Metals	EPA 9070 oil and grease EPA 418.1 total recov. hydroc.	EPA 8015 (mod) 8010 9071 8015 (mod) 8015 (mod) 9071 8010 6010

18. Submit Site Safety Plan

19. Workman's Compensation: Yes No

Copy of Certificate enclosed? Yes No

Name of Insurer Industrial Indemity Company CJ906-9663

20. Plot Plan submitted? Yes No

21. Deposit enclosed? Yes No

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

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

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

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

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

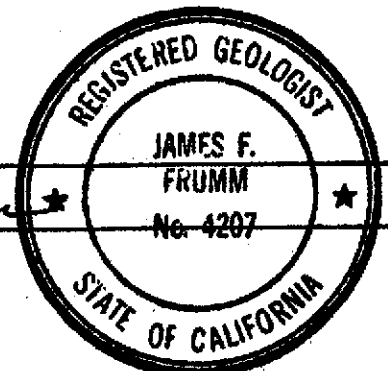
I will notify the Department of Environmental Health at least two (2) working days (48 hours) after approval of this closure plan in advance to schedule any required inspections. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility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

Signature of Contractor

Name (please type) James F. Frumm

Signature *James F. Frumm* *

Date 9-12-90



Signature of Site Owner or Operator

Name (please type) Gary Phipps

Signature *Mary Long for Sears Automotive*

Date 9/12/90

NOTES:

1. Any changes in this document must be approved by this Department.
2. Any leaks discovered must be submitted to this office on an underground storage tank unauthorized leak/contamination site report form within 5 days of its discovery.
3. Three (3) copies of this plan must be submitted to this Department. One copy must be at the construction site at all times.
4. After approval of plan, notification of at least two (2) working days (48 hours) must be given to this Department prior to removal of tank(s).
5. A copy of your approved plan must be sent to the landowner.
6. Triple rinse means that:
 - a) Final rinse must contain less than 100 ppm of Gasoline (EPA method 8020 for soil, or EPA method 602 for water) or Diesel (EPA method 418.1). Other methods for halogenated volatile organics (EPA method 8010 for soil, EPA method 601 for water) may be required. The composition of the final rinse must be demonstrated by an original or facsimile report from a laboratory certified for the above analyses.
 - b) Tank interior is shown to be free from deposits or residues upon a visual examination of tank interior.
 - c) Tank should be labelled as "tripled rinsed; laboratory certified analysis available upon request" with the name and address of the contractor.

If all the above requirements cannot be met, the tank must be transported as a hazardous waste.

7. Any cutting into tanks requires local fire department approval.

UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

ATTACHMENT A SAMPLING RESULTS

Tank or Area	Contaminant	Location & Depth	Results (specify units)

COIC CERTIFICATE OF INSURANCE

12/27/89

PRODUCER

Marsh & McLennan, Incorporated
3303 Wilshire Boulevard
Los Angeles CA 90010

(213) 380-1600

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

COMPANIES AFFORDING COVERAGE

COMPANY LETTER **A** Industrial Indemnity Company

COMPANY LETTER **B**

COMPANY LETTER **C**

COMPANY LETTER **D**

COMPANY LETTER **E**

INSURED

C. R. & R., Inc., et al
DBA: American Environmental Management Corp.
11292 Western Avenue
P. O. Box 125
Stanton CA 90680

COVERAGES

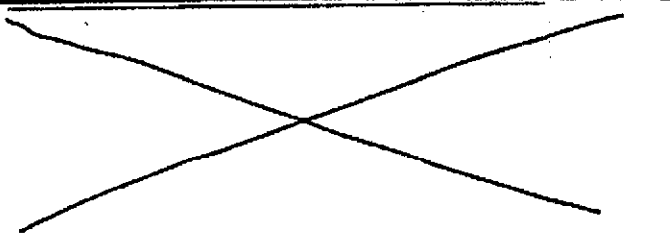
THIS IS TO CERTIFY THAT POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE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

CO	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	ALL LIMITS IN THOUSANDS	
					GENERAL AGGREGATE	\$
	GENERAL LIABILITY				GENERAL AGGREGATE	\$
	<input type="checkbox"/> COMMERCIAL GENERAL LIABILITY				PRODUCTS/COMPOSE AGGREGATE	\$
	<input type="checkbox"/> CLAIMS MADE <input type="checkbox"/> OCCURRENCE				PERSONAL & ADVERTISING AGGREGATE	\$
	<input type="checkbox"/> OWNER'S & CONTRACTORS PROTECTION				EACH OCCURRENCE	\$
					FIRE DAMAGE AND ONE FIRE	\$
					MEDICAL EXPENSE (MAX ONE PERSON)	\$
	AUTOMOBILE LIABILITY				COL	\$
	<input type="checkbox"/> ANY AUTO				BODILY INJURY (PER PERSON)	\$
	<input type="checkbox"/> ALL OWNED AUTOS				BODILY INJURY (PER ACCIDENT)	\$
	<input type="checkbox"/> SCHEDULED AUTOS				PROPERTY DAMAGE	\$
	<input type="checkbox"/> HIRED AUTOS					
<input type="checkbox"/> NON-OWNED AUTOS						
<input type="checkbox"/> GARAGE LIABILITY						
	EXCESS LIABILITY				EACH OCCURRENCE	\$
	<input type="checkbox"/> OTHER THAN UMBRELLA FORM				AGGREGATE	\$
A	WORKERS' COMPENSATION AND EMPLOYERS' LIABILITY	CJ906-9663	1/1/90	1/1/91	STATUTORY	\$ 1,000, EACH ACCIDENT
						\$ 1,000, (DISEASE-POLICY LIMIT)
						\$ 1,000, (DISEASE-EACH EMPLOYEE)
	OTHER					

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/RESTRICTIONS/SPECIAL ITEMS

2633 Telegraph Ave Oakland, Calif

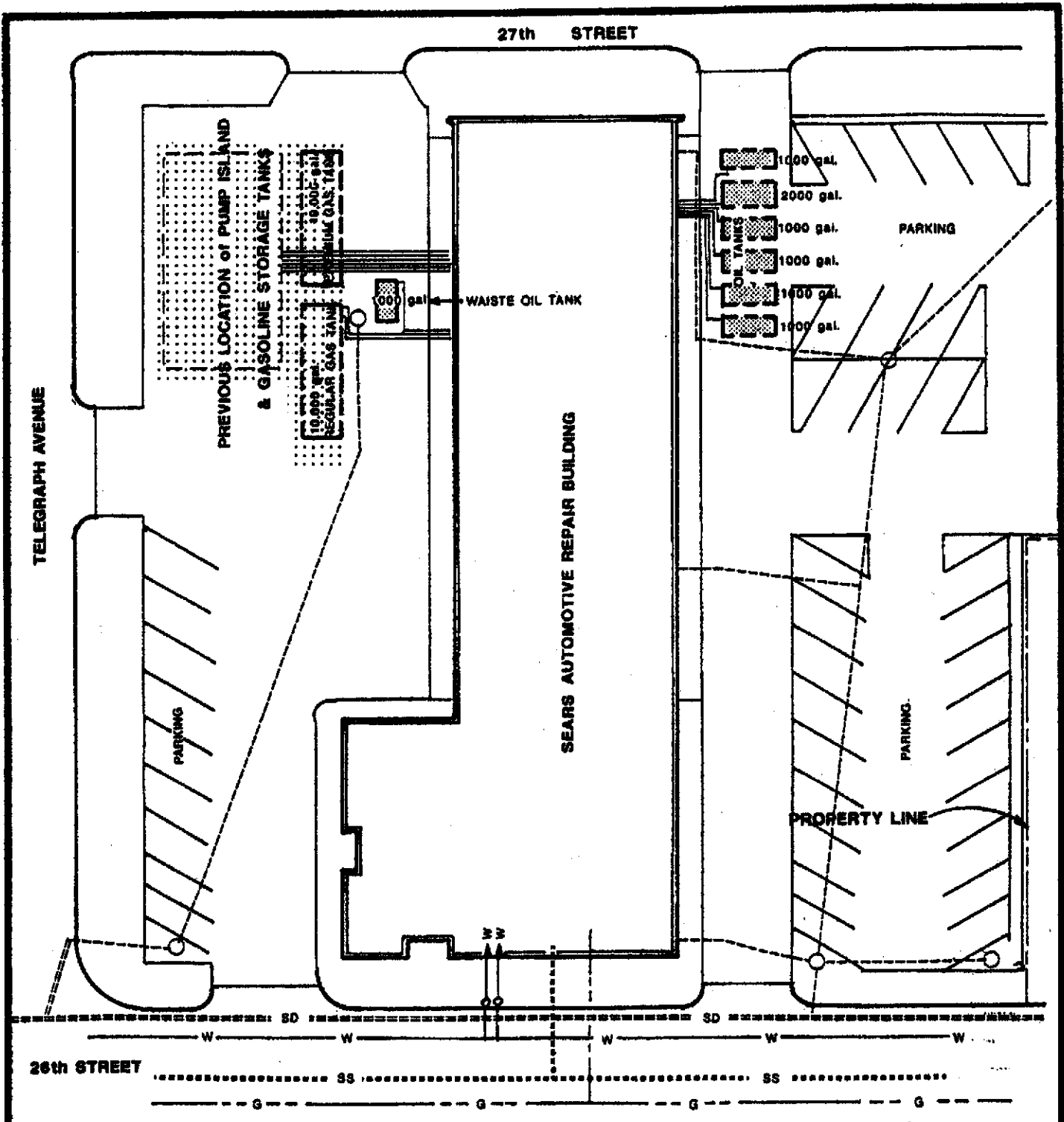
CERTIFICATE HOLDER



CANCELLATION

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

AUTHORIZED REPRESENTATIVE *Morton S. Frank* Marsh & McLennan, Incorporated



EXPLANATION:

- W — WATER MAIN
- - - G - - - GAS MAIN
- SS SANITARY SEWER
- == SD STORM DRAIN
- - - DRAIN LINE
- [Hatched Box] TANKS TO BE EXCAVATED
- [Dotted Box] PREVIOUS LOCATION OF PUMP ISLAND & STORAGE TANKS



0' 10' 20' 30'
 SCALE: 1"=30'0"

AMERICAN
 ENVIRONMENTAL MANAGEMENT CORP.

FIGURE 1
SITE PLAN

SEARS AUTOMOTIVE - Oakland, California

DRAWN BY: GPM	DATE: 9/11/90	PROJECT NO. 50109
---------------	---------------	-------------------

AMERICAN
ENVIRONMENTAL MANAGEMENT CORP.

Please Refer To:
AEMC Job No. 50109

12 September, 1990

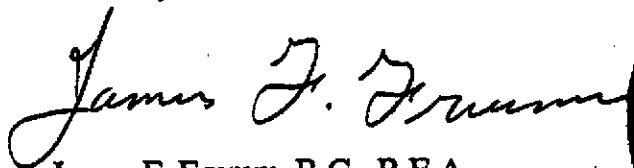
Mr. Paul Smith
Alameda County Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, California 94621

**RE: TANK CLOSURE PLAN FOR SEARS, ROEBUCK AND COMPANY
OAKLAND, CALIFORNIA**

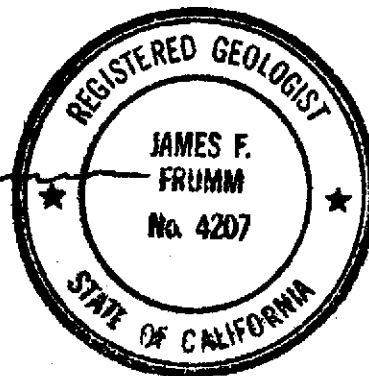
Please find enclosed a completed Permit Application, a Tank Closure Plan and a Health and Safety Plan for the removal of seven underground storage tanks at 2633 Telegraph Avenue in Oakland, California. Also enclosed is the required fee of \$1,452.00 for the removal of the seven tanks.

Thank you in advance for the prompt processing of this application. If there are any questions or comments concerning the enclosed information, please feel free to contact Ms. Mary Long or me at (916) 364-8872.

Sincerely,



James F. Frumm, R.G., R.E.A.
Regional Manager
Engineering Division



ML/scg
11src-09(ml-2)

Enclosures

**TANK CLOSURE PLAN FOR
SEARS, ROEBUCK AND COMPANY
Oakland, California**

American Environmental Management Corporation (AEMC) has been contracted by Sears, Roebuck and Company to remove seven underground storage tanks (USTs) at 2633 Telegraph Avenue in Oakland, California. The seven USTs to be removed are six fuel oil tanks and one waste oil tank.

mobile phone (916) 765 5166

Tom Anker

John Holderman - site safety officer

PRE-TANK REMOVAL ACTIVITIES

All product will be pumped from the tanks using a vacuum truck and disposed of or recycled at an approved facility before tank removal activities begin.

A concrete cutting subcontractor will cut through the asphalt covering the tanks prior to excavation work.

TANK REMOVAL ACTIVITIES

AEMC will use a backhoe to remove shallow soil covering the tops of the tanks and will stockpile this soil on Visqueen. The fuel lines to the dispensers will also be exposed. Once tanks have been exposed and are ready for removal, they will be purged with dry ice per County specifications.

An Alameda County Hazardous Material Specialist will need to be on-site to inspect the tanks and oversee sample collection. AEMC will proceed with the tank removal but not the sampling until the county representative is onsite.

The seven USTs and associated lines will be excavated and removed from the site along with the tanks. AEMC will transport the tanks to Erikson, Inc. in Richmond, California for disposal. The tanks will not be triple-rinsed before disposal. The

USTs will be transported under hazardous waste manifest to Richmond, California, hauler license No. 0354.

SOIL/WATER SAMPLING AND DECONTAMINATION PROCEDURES

The type and number of samples to be collected will depend on whether or not water is present in the excavation and whether contamination is discovered.

If water is not present in the tank excavation, soil samples will be collected at each end of the UST at a depth of 2 to 4 feet. Soil samples will be taken from the bucket of the backhoe, representing the native soil under the tank.

Decontamination procedures will involve washing the 2-inch x 6-inch brass tubes in Liqui-Nox before hand driving the tubes into the soil. The soil samples will be capped with Teflon, plastic end caps, and logged on a chain-of-custody form. The samples will be stored on Blue Ice and taken to American Environmental Laboratories Corporation (State Certification No. 210) for analyses. The samples will be analyzed on a 24-hour turn around time.

The samples will be analyzed for Total Recoverable Hydrocarbons and Oil and Grease for the oil tank and waste oil samples. Following is the proposed analytical protocol for soil samples.

**PROPOSED ANALYTICAL PROTOCOL
SOIL
SEARS AUTOMOTIVE FACILITY
Oakland, California**

Analysis	Container	Preservation	Analytical Method
TRH ^a	Brass Tube	4°C	EPA 418.1
Oil and Grease	Brass Tube	4°C	EPA 9070

^a Total Recoverable Hydrocarbons

**HEALTH AND SAFETY PLAN FOR
SEARS, ROEBUCK AND COMPANY
Oakland, California**

American Environmental Management Corporation's (AEMC) Health and Safety Program meets the requirements of 29 CFR 1910.120.

PERSONAL PROTECTION

All field personnel assigned to the Sears site are responsible for: following the supervisor's directions; performing activities in a manner for which they have been trained; reporting any and all accidents, injuries, or unsafe conditions; complying with all site specific health and safety requirements; and conducting work in a manner so as not to jeopardize the health of oneself or fellow employees.

All employees assigned field duties, or who may be potentially exposed to chemical, physical, and/or biological hazards, shall have completed a comprehensive medical examination within the last twelve months. Each person shall have a signed physician's approval to use respiratory protective equipment and shall not have any current medical restrictions that may impair working in a safe and healthful manner.

All field personnel have received the 40-hour Health and Safety Training.

ON-SITE MONITORING

Routine evaluation of hazards may be conducted by the field supervisor and/or qualified and trained field technicians as instructed by the Industrial Hygienist on call. AEMC has a certified Industrial Hygienist on call 24 hours a day.

If an emergency should arise, the nearest hospital is: Gladman Hospital, 2633 E. 27th Street, Oakland, California; 536-8111.

REQUIRED SAFETY EQUIPMENT

AEMC personnel and subcontractors shall have the following personnel protection equipment. Level C protective gear will be worn by all field personnel.

1. Industrial grade work boots with steel toe
2. Hard hat
3. Safety glasses
4. Nitrile gloves
5. Half-face respirator equipped with organic vapor cartridges *
6. Tyvex coveralls
7. Lower Explosive Limit (LEL) Meter
8. Fire Extiguishers

- * To be donned if contaminated soil is present and the odor detected in the work area.

The Oakland Fire Marshal's office was contacted and they will issue a permit when they receive a tank removal form and fees for the tank removal. A copy of the Tank Closure Plan will be submitted for review before any tank removal activities are begun.

POST TANK REMOVAL ACTIVITIES

The excavations will be covered with trench plates after the tanks are removed. The excavations will be backfilled with clean soil pending approval from Alameda County Department of Health. A fence will be set up to prevent entrance to the excavations.

AEMC will submit a copy of the closure report, which will include laboratory analyses, chain-of-custody forms and manifests, to Alameda County Department of Health within 60 working days after the final tank is removed from the site.

All stockpiles shall be visqueen covered.
1 composite stockpile sample shall be taken every 20 yds³

Permit No.	P.17/17
Copies to	
Date Issued	

APPLICATION for PERMIT to INSTALL, REMOVE or REPAIR TANKS

IN THE CITY OF OAKLAND

Date 9-12-90

Application is hereby made for permit to ^{* remove} install gasoline tank and excavate, commencing ^{four feet inside the curb line} _{* Inside the property line} repair fuel oil

on the east side of Telegraph St. Ave. feet of St. Ave.

House No. 2633 Telegraph Oakland, Ca Street 7 UST's
and Street Sears Tower-Chicago Avenue Present storage

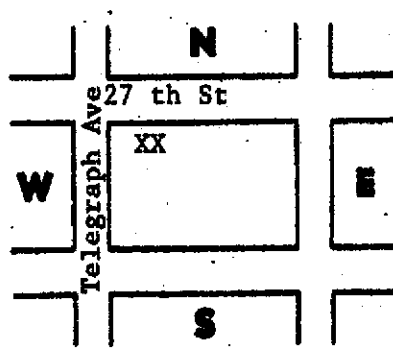
Owner Sears, Roebuck And Company Address Dept 731LP BSC 39-34 Phone 312-875-8864
Chicago, Illinois

Applicant American Environmental Address 9719 Lincoln Village Dr Phone 916-364-8872
St. 501 Sacramento, Ca

Remarks

Sidewalk surface to be disturbed NA X Number of Tanks 2 5 Capacity 2,000 1,000 Gallons each

Signature James H. Drummond



Tank removal fees: \$ 80.00 first tank
\$ 40.00 each additional tank

A check for \$ 320.00 will be submitted with this application.

27th St

Telegraph

1	1000 x
2	2000 x
3	1000
4	1000 x
5	1000 x
6	1000 y

x = had a hole some where in tank