

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



9-27-01

20507

STID 4419

September 13, 2001

Mr. Poulakidas
159 Gold Mine Drive
San Francisco, CA 94131

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

Re: Property at 14180 E. 14th Street, San Leandro, CA 94578

Dear Mr. Poulakidas:

I am in receipt of "IOS/SVE Pilot Study Report" by Mr. Peter M. Krasnoff of West Environmental Services & Technology dated July 25, 2001, regarding the above referenced site.

I have reviewed the above workplan and discussed that with Mr. Krasnoff, your consultant as well. Per pilot study performed above "Vapor Extraction" was found to be ineffective. However, In-Situ Ozone Sparging has been found to be effective in remediating contaminated sites with similar scenarios. Therefor, I concur with Mr. Krasnoff's proposal for use of In-Situ Ozone Sparging system.

Additionally you may use Soil Vapor Extraction to capture off-gases from In-Situ Ozone Sparging system.

Once the system is installed, you may perform monthly analysis to verify effectiveness of the remediation system until further notice. However, you might be required to modify the system based on the result of this remediation system, per my discussion with Mr. Krasnoff.

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

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Peter M. Krasnoff of West Environmental Services & Technology ~~dated July 25, 2001~~
Jeff Hennier of Aure Environmental, 828 Mission Ave., San Rafael, CA 94901
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 9-22-2000

PO507

Stid 4419

September 18, 2000

Mr. Poulakidas
159 Gold Mine Drive
San Francisco, CA 94131

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

Re: Property at 14180 E. 14th Street, San Leandro, CA 94578

Dear Mr. Poulakidas:

Per our discussion today I have reviewed the Corrective Action Plan dated May 24, 2000, by Mr. Jeff Hennier of Aure Environmental. As you are aware I had already verbally approved this workplan. You may implement this workplan. However, please be advised that the remediation type, etc., may need to be altered and or modified depending on the actual results achieved in the field.

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'.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Jeff Hennier of Aure Environmental, 828 Mission Ave., San Rafael, CA 94901
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 8-28-2000

RO# 507

Stid 4419

August 28, 2000

Mr. Poulakidas
159 Gold Mine Drive
San Francisco, CA 94131

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

Re: Property at 14180 E. 14th Street, San Leandro, CA 94578

Dear Mr. Poulakidas:

As you are aware we just discussed the above referenced site in regard to an error which occurred in my previous letter. I understand Mr. Michael Manetas does not work for Azure Environmental and that he is one of the landlords along with your wife regarding the above referenced property. I apologize for this error and I understand that Mr. Jeff Hennier of Aure Environmental of Azure Environmental is still your consultant regarding this site.

If you recall my previous letter was in response to your report of the "Quarterly Groundwater Monitoring Report" dated January 31, 2000, regarding the above referenced site, submitted by Mr. Jeff Hennier of Azure Environmental. I made the following comments regarding that report:

1. AZ-2 well has presently the highest concentrations of benzene at 26,000ppb followed by AZ-1, AZ-4, AZ-3, and AZ-8 wells at 20,000ppb, 11,000ppb, 9,700ppb, and 3,600ppb of benzene respectively.
2. A decrease in the concentrations of the constituents in general due to aerobic and anaerobic attenuation as evidenced by the indicative elements.
3. The groundwater flow gradient indicates an almost Southerly direction at 0.0003 ft/ft.
4. I agreed with the recommendations made by Mr. Jeff Hennier of Aure Environmental of Azure Environmental in regard to MW-9, MW-10, and MW-6 wells as far as scheduling
5. I indicated that MTBE and 1,2-DCA might be analyzed on a semi-annual basis.
6. I mentioned that the AZ-1 and Az-3 could go on Semi-annual instead due to having high concentrations of constituents including benzene.

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', written over a horizontal line.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Jeff Hennier of Aure Environmental, 828 Mission Ave., San Rafael, CA 94901
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 02-23-2000
including eHS

20507

Stid 4419

February 23, 2000

Mr. Poulakidas
159 Gold Mine Drive
San Francisco, CA 94131

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

Re: Property at 14180 E. 14th Street, San Leandro, CA 94578

Dear Mr. Poulakidas:

I have received and reviewed the "Quarterly Groundwater Monitoring Report" dated January 31, 2000, regarding the above referenced site, submitted by Mr. Michael Manetas of Azure Environmental. I would like to make the following comments:

This report indicates that AZ-2 well has presently the highest concentrations of benzene at 26,000ppb followed by AZ-1, AZ-4, AZ-3, and AZ-8 wells at 20,000ppb, 11,000ppb, 9,700ppb, and 3,600ppb of benzene respectively.

There seems to be a decrease in the concentrations of the constituents in general due to aerobic and anaerobic attenuation as evidenced by the indicative elements.

The groundwater flow gradient indicates an almost Southerly direction at 0.0003 ft/ft.

I concur with the recommendations made by Mr. Michael Manetas of Azure Environmental in regard to MW-9, MW-10, and MW-6 wells as far as scheduling. However, I believe that the AZ-1 and Az-3 can go on Semi-annual instead due to having high concentrations of constituents including benzene.

MTBE and 1,2-DCA may be analyzed on a semi-annual basis.

I will be looking forward to receive the next quarterly groundwater monitoring report and corrective action plan report for the first quarter 2000.

Please call me at (510) 567-6876, if you have any questions, or need additional time.

Sincerely,


Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Jeff Hennier of Aure Environmental, 828 Mission Ave., San Rafael, CA 94901
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 2-18-2000
including cc's

00509

Stid 4419

February 17, 2000

Mr. Poulakidas
159 Gold Mine Drive
San Francisco, CA 94131

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

Re: Property at 14180 E. 14th Street, San Leandro, CA 94578

Dear Mr. Poulakidas:

As you are aware, I have had several correspondences with you and your consultant, Mr. Jeff Hennier of Aure Environmental, regarding the clean up issues at the above referenced site. One of your concerns, understandingly, was change of our office personnel overseeing the clean up issues at the above referenced site. I expressed my willingness to continue the directions given by my previous colleagues in order to keep continuity and to expedite the clean up process. After our last telephone conversation I understood that you were willing to have me continue the overseeing process. However, I just wanted to ensure that I you indeed have decided to have me oversee this process. Anyhow, I would appreciate it if you or your consultant, Mr. Hennier, could confirm my understanding of the situation.

If I do not hear anything from you, I will assume that you have decided to continue working with our office till the eventual site closure, otherwise please call me to inform me of your decision. Anyway your reply will be appreciated.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Jeff Hennier of Aure Environmental, 828 Mission Ave., San Rafael, CA 94901
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



FEB 08 2000

CC's

po507

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

Stid 4419

February 8, 2000

Ms. Irene Poulakidas
& Mr. Michael Manetas
159 Gold Mine Drive
San Francisco, CA 94131

Mr. Walter Youngman
Conservator
W.J. Simas Estate
1981 N. Broadway, #300
Walnut Creek, CA 94546

Re: Property at 14180 E. 14th Street, San Leandro, CA 94578

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Ms. Poulakidas and Mr. Manetas:

This letter is to inform you of new 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.

LANDOWNER NOTIFICATION

Re: 14180 E. 14th Street, San Leandro

February 8, 2000

Page 2 of 2

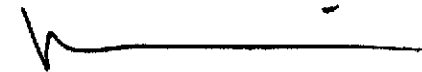
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 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) 567-6876 if you have any questions about the content of this letter.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB

Attachments: Sample letter 2 and Sample letter 3, which must be filled out by the Responsible Party and mailed to Alameda County.

Alameda County Health care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

**"List of Landowners" form
(Sample Letter 2)**

**SUBJECT: CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR (Site
name and address)
(to be filled in by the primary responsible party and mailed to
Alameda County)**

(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

Alameda County Health care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

**"Notice of Proposed Action" form
(Sample Letter 3)**

**SUBJECT: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY FOR
(site name and address)
(to be filled in by the primary responsible party and mailed to
Alameda county)**

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 10-13-99
J. HENNIER
M. BAKALDIN
W. YOUNGMAN
S. POULAKIDAS 20507

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

October 12, 1999

Sakee K. Poulakidas
159 Gold Mine Drive
San Francisco, CA 94131

STID: 4419

Re: Workplan for investigations at the former Simas Brothers site, located at 14180 14th Street, San Leandro, CA 94578

Dear Mr. Poulakidas,

This office has reviewed Azure Environmental's (Azure) October 05, 1999 workplan addressing soil gas sampling and the installation of additional monitoring wells at the above site. The workplan is acceptable to this office with the following required changes:

- Soil gas samples must be collected at deeper depths than those proposed to avoid influences from fluctuating atmospheric conditions. This office is requesting that soil gas samples be collected from immediately above the capillary fringe at each proposed location, and that a minimum of two additional soil gas samples be collected at 3- to 5-foot intervals above these samples to assess vertical attenuation of soil gas from the capillary fringe. In this way, we will obtain a more accurate assessment of existing subsurface soil gas levels, and therefore eliminate the need for a second round of soil gas samples, as proposed in the workplan.
- Based on the elevated contaminant concentrations identified in the "grab" groundwater sample collected from HP-11, located adjacent to the Veterinary Clinic, this office is requiring that further groundwater monitoring be conducted in this area to assess the contaminant concentrations existing below the Veterinary Clinic and to determine whether these concentrations are posing a threat to occupants of this building. I discussed the need for further characterization of this area with Jeff Hennier, Azure, on October 12, 1999, and Mr. Hennier suggested that groundwater samples collected from on-site well AZ-4 and an additional well in the location of Boring HP-10 be used to extrapolate the contaminant concentrations existing beneath the Veterinary building. Although this proposal is generally acceptable, our office always prefers real data, if at all possible, to extrapolated data. Therefore, if one additional monitoring well is going to be drilled in this area, this office feels that it should be drilled immediately adjacent to the clinic building in order to collect real data. If this is not possible, than Mr. Hennier's above proposal would be acceptable.
- Please be reminded to collect blank and duplicate soil gas samples for quality assurance purposes.

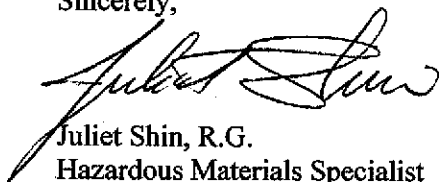
Sakee K. Poulakidas
Re: 14180 14th Street
October 12, 1999
Page 2 of 2

If further assessments in the area of the adjacent Veterinary clinic and residences indicate that the existing contaminant concentrations beneath these buildings could be posing a threat to the health of the occupants, measures will be required to mitigate or expedite attenuation of this contamination.

A letter addendum to the workplan, acknowledging the above changes, is required to be submitted to this office within 20 days of the date of this letter.

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

Sincerely,



Juliet Shin, R.G.
Hazardous Materials Specialist

Cc: Jeff Hennier
Azure Environmental
828 Mission Avenue
San Rafael, CA 94901

Mike Bakaldin
City of San Leandro
835 East 14th Street
San Leandro, CA 94577

Walter Youngman
Conservator, W.J. Simas Estate
1981 N. Broadway, #300
Walnut Creek, CA 94596

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

R0507

May 04, 1999

Sakee K. Poulakidas
159 Gold Mine Drive
San Francisco, CA 94131

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

STID: 4419

Re: Former Simas Brothers site, located at 14180 14th Street, San Leandro, CA 94578

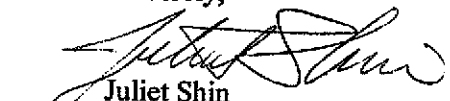
Dear Mr. Poulakidas,

This office has reviewed the April 30, 1999 Groundwater Monitoring Report prepared by Azure Environmental. Based on the NonDetect results for the oxygenates in this last monitoring event, future groundwater monitoring at the site will not require the analysis for these oxygenates, with the exception of MTBE. The analysis for MTBE must continue because levels exceeding 200 parts per billion (ppb), which is the Regional Water Quality Control Board's current threshold value, were recently identified in some of the monitoring wells.

Please continue to keep us posted on the status of SWRCB's review and cost pre-approval. Once you receive the cost pre-approval, please notify this office at least one week in advance of field activities.

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

Sincerely,


Juliet Shin
Hazardous Materials Specialist

Cc: Jeff Hennier, Azure Environmental
828 Mission Avenue, San Rafael, CA 94901
Mike Bakaldin, City of San Leandro
835 East 14th Street, San Leandro, CA 94577
Walter Youngman, Conservator, W.J. Simas Estate
1981 N. Broadway, #300, Walnut Creek, Ca 94596

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 507

ENVIRONMENTAL HEALTH SERVICES

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

February 22, 1999

Sakee K. Poulakidas
159 Gold Mine Drive
San Francisco, CA 94131

STID: 4419

Re: Workplan for additional investigations at the Former Simas Service Station, located at
14180 East 14th Street, San Leandro, CA

Dear Mr. Poulakidas,

This office has reviewed Azure Environmental's workplan, dated February 11, 1999, addressing additional soil and groundwater investigations and the submittal of a Corrective Action Plan. The workplan is acceptable to this office with the following additional requirement and reminder:

- Per my conversation with Jeff Hennier, Azure Environmental, on February 22, 1999, none of the proposed borings are located adjacent to the Veterinary Clinic. An assessment of contaminant levels adjacent to or beneath the Veterinary Clinic is essential in assessing any potential impacts to the occupants of that building. Therefore, it was decided that an additional boring will be needed next to the Veterinary Clinic. Mr. Hennier proposed that this boring be placed along the property boundary, which is located roughly 10 feet from the Veterinary Clinic building. This location is acceptable to this office.
- Per my conversation with Mr. Hennier, it was confirmed that Azure Environmental will screen across the water table and down to 5- to 10-feet below the water table for the proposed "grab" groundwater samples.

Per the workplan, the proposed work will be completed within 12 to 16 weeks. This office should be notified if delays are anticipated. If difficulties arise in obtaining access agreements, please notify this office so that we may intervene and attempt to expedite the process. Please notify this office at least one week in advance of implementing the field work.

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

Sincerely,


Juliet Shin
Hazardous Materials Specialist

Cc: Jeff Hennier, Azure Environmental, 828 Mission Avenue, San Rafael, CA 94901
Mike Bakaldin, City of San Leandro, 835 East 14th St., San Leandro, CA 94577
Walter Youngman, Conservator, W.J. Simas Estate, 1981 N. Broadway, #300, Walnut Creek, CA 94596

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#507

January 4, 1999

Sakee K. Poulakidas
159 Gold Mine Drive
San Francisco, CA 94131

ENVIRONMENTAL HEALTH SERVICES

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

STID: 4419

Re: Required investigations at the Former Simas Brothers site, located at 14180 14th Street, San Leandro, CA 94578

Dear Mr. Poulakidas,

Soil and groundwater investigations have been conducted at the above site since 1986, in response to contamination being identified during the removal of three 10,000-gallon gasoline underground storage tanks (USTs) and one 550-gallon waste oil UST. These investigations have included the collection of soil samples from the overexcavation of the former UST pits and from two soil borings drilled at the site in 1987, as well as the collection of both soil and groundwater samples from soil borings and wells SB-1 through SB-3, HP-1 through HP-8, and AZ-1 through AZ-8 between 1993 to 1996. Analyses of soil samples have identified elevated levels of Total Petroleum Hydrocarbons as Gasoline (TPHG) and benzene, toluene, ethylbenzene, and total xylenes (BTEX) from the former UST excavation pit and from 15- to 25-feet below ground surface (bgs) on site. Additionally, analyses of the groundwater samples collected to date have identified elevated levels of TPHG and BTEX both on- and off-site; and the benzene concentrations identified in the groundwater samples collected from all the on-site wells and intermittently in some of the off-site wells have exceeded the human-health protective levels of 3,300 parts per billion (ppb) for commercial sites and 110ppb for residential sites calculated in Azure Environmental's November 1996 Draft Risk Management Plan.

The site is currently bounded by a residential area to the north; a veterinary hospital to the northwest; and is located across 141st Street and East 14th Street from both commercial and residential areas to the east and west. Contaminant concentrations identified in Wells AZ-3 and AZ-4, which are located closest to the adjacent residential area and veterinary hospital, have continuously exceeded the established human-health protective threshold values, and there is some concern that commensurate contaminant concentrations to those found in these wells are located beneath these adjacent properties and may be posing a threat to their occupants. **Therefore, this office is requiring that the extent of the contaminant plume be delineated in these potentially sensitive areas to the north, northwest, and west.** Although the extent of the contaminant plume has been delineated to the south/southwest, which is the predominant downgradient direction, it is likely that the plume has also migrated in the "upgradient" and "crossgradient" directions due to the considerably flat groundwater gradient, which has ranged roughly between 0.001 to 0.003 since sampling began. Delineation of the plume to the west is particularly justified because it appears that groundwater may intermittently flow in this direction as indicated by the elevation contours in the November 1997 sampling event. Per your request in our meeting of December 16, 1998, the initial plume delineation work to the north may be conducted along the boundary of the site and the residential area.

If the above required delineation investigations identify contaminated groundwater below the adjacent properties at levels consistently exceeding the established human-health protective levels, this office will

Sakee Poulakidas
Re: 14180 14th St.
January 4, 1999
Page 2 of 4

require that a soil vapor study be conducted to assure that there is no immediate significant threat to the occupants. (Attached are copies of some vapor sampling techniques and draft vapor threshold values established by the San Francisco Bay Regional Water Quality Control Board (RWQCB) for BTEX). This office has reviewed Ravi Arulanantham's vapor transport flow chart that was submitted by your consultant Jeff Hennier, Azure Environmental, to this office on December 17, 1998. Although the flow chart implies that there is no soil vapor pathway if there is a minimum of three feet of clay above a contaminated area, RWQCB only applies this criteria to sites with low contaminant concentrations and on a case-by-case basis. It was determined by this office and RWQCB that this criteria could not be applied to this site due to elevated contaminant concentrations.

If vapor sampling is conducted, such as with Summa Canisters, more than one sample for each location will be required to be collected during periods of varying temperatures and barometric pressures. Per our meeting on December 16, 1998, Mr. Hennier proposed that if soil vapor sampling results were below the threshold values that we could consider that occupants of these sites were protected, regardless of the fact that groundwater concentrations exceeded the calculated risk assessment threshold values. However, soil vapor sampling results can vary greatly from sampling event to sampling event, and this office is reluctant to rely solely on soil vapor sampling results to guarantee the protection of human health.

Based on the elevated contaminant concentrations on and off site, this office, in conjunction with RWQCB, is requiring that efforts be made to mitigate or expedite the attenuation of the contaminant plume. A Feasibility Study will need to be submitted assessing the viability of various remediation options for our review and approval. This office and RWQCB is currently in agreement that the contaminant plume does not appear to be stable and a source still appears to exist on site based on the extremely elevated levels and fairly slow attenuation rates of the contaminant concentrations. Although it was stated in our meeting that the applications of Oxygen-Releasing Compounds (ORCs) may not be effective in remediating the contaminant plume based on the results of the January 1998 pilot test and the low recoveries of microbial populations in a sample collected from the center of the plume, it is highly recommended that additional samples be collected for microbial analysis from the periphery of the plume to determine whether ORCs can be used as an "oxygen barrier" to deter further migration of the plume off site. Microbes sometimes find it difficult to survive very elevated contaminant concentrations in the center of a contaminant plume, however, low contaminant concentrations at the periphery can provide a healthy balance for microbial growth and degradation of contaminants.

As discussed in our meeting of December 16, 1998, a Final Risk Management Plan to the Draft November 22, 1996 plan will need to be submitted and filed with the Deed when the site is ready for closure. Although the Draft Risk Management Plan addresses threshold values for on-site groundwater scenarios and the "soil volatilization to outdoor air" scenario, a Tier 2 risk assessment calculation will be required for the "soil volatilization to indoor air" scenario at any time in the future when a building is constructed on site. The Tier 2 evaluation for this scenario/pathway should follow the guidelines established by the American Society for Testing and Materials' Risk-Based Corrective Action guidelines (E 1739-95). Additionally, this office will require that additional soil samples be collected and analyzed for the appropriate constituents from the former UST pit for the calculation of this scenario, since

Sakee Poulakidas
Re: 14180 14th St.
January 4, 1999
Page 3 of 4

overexcavation samples formerly collected from the UST pit in 1986 and 1987 were not analyzed for BTEX and their exact locations uncertain.

Per RWQCB's guidelines, future groundwater samples must be analyzed for the following listed oxygenates, (using Method 8260), and lead scavengers, (using Method 8010): Methyl Tertiary Butyl Ether (MTBE), Diisopropyl Ether (DIPE), Tertiary Amyl Methyl Ether (TAME), Tertiary Butyl Alcohol (TBA), Ethyl Tertiary Butyl Ether (ETBE), Ethylene Dibromide (EDB) and Ethylene Dichloride (EDC).

Per our meeting, it is my understanding that a groundwater monitoring event was recently conducted in November 1998, and that a report documenting the results of this sampling event will be submitted to this office by the end of January 1999. The next sampling event shall be conducted by the end of February 1999.

Future groundwater samples must be collected and analyzed on a quarterly basis from Wells AZ-1 through AZ-4, AZ-6, and AZ-8. The sampling frequency for Wells AZ-5 and AZ-7 may be reduced to an annual basis, however, it may be helpful to collect samples from these wells for bioindicator parameters on a quarterly or semi-annual basis for comparison purposes. By comparing bioindicator parameters from the center of the plume with those at the perimeter of the plume, such as the levels of ions with their reduced counterparts, one can get a more accurate picture of the degree of aerobic and/or anaerobic degradation occurring on and off site. It is strongly recommended that analysis for the ions, such as nitrate and ferric iron, as well as their reduced counterparts, such as nitrite and ferrous iron, be conducted both at the center and periphery of the plume. Future reports listing bioindicator parameter analysis results should be accompanied by a detailed interpretation/conclusion section for the results.

This office has faxed a listing of several domestic and irrigation wells to your consultant, Jeff Hennier, which may be subject to impact by the site's contaminant plume. This office is requesting that further research be conducted on these wells to confirm their proximity to the site and determine whether these wells have been or may be impacted by the plume.

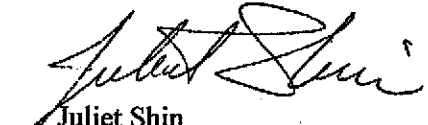
A workplan addressing the above required work and information shall be submitted to this office within 45 days of the date of this letter (i.e., by February 15, 1999). However, an additional 60 days will be allotted subsequent to the submittal and review of the workplan to provide sufficient time for the State Water Resources Control Board's (SWRCB) review of the workplan to assure reimbursement by the Trust Fund, and for workplan revisions and bidding process.

Lastly, this office appreciates your prompt submittal of the copy of SWRCB's July 28, 1998 letter regarding the States 5-year review of your claim. Based on my review of the letter, it does not appear that the State has determined your case to be eligible for closure. As stated in the letter, "the 5-year review does not relieve you of any responsibilities or activities for which you have been directed to conduct by the local regulatory agency...". Until otherwise notified by the State, investigations will continue at the site per the requirements of State regulations and guidelines.

Sakee Poulakidas
Re: 14180 14th St.
January 4, 1999
Page 4 of 4

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

Sincerely,



Juliet Shin
Hazardous Materials Specialist

ATTACHMENTS

Cc: Jeff Hennier, Azure Environmental
828 Mission Avenue, San Rafael, CA 94901
Mike Bakaldin, City of San Leandro
835 East 14th St., San Leandro, CA 94577
Walter Youngman, Conservator, W.J. Simas Estate
1981 N. Broadway, #300, Walnut Creek, CA 94596

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#507

ENVIRONMENTAL HEALTH SERVICES

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

May 15, 1998

STID #4419

Mr. Sakee Poulakidas
Ms. Irene Poulakidas
156 Gold Mine Drive,
San Francisco, Ca 94131

**Subject: FORMER SIMAS STATION, 14180, East 14th Street,
San Leandro, CA 94607**


Dear Mr. & Ms. Poulakidas:

This office, at your request, met with Azure Environmental, your consultant of record for the aforementioned site. You had requested the meeting due to the frequency of sampling required for the monitoring wells on site.

In light of the high concentrations of petroleum hydrocarbons encountered in the groundwater, and the fact that you are employing an Oxygen Release Compound (ORC) at the site, you will be required to continue monitoring quarterly. Please direct your consultant to continue sampling. The quarterly monitoring reports should also be submitted in a timely manner.

If you have any questions, please contact this office. The telephone number is (510) 567-6737.

Sincerely,


Brian P. Oliva, REHS, REA
Hazardous Materials Specialist

c: Jeff Hennier, Azure Environmental
Mike Bakaldin, City of San Leandro

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 507

ENVIRONMENTAL HEALTH SERVICES

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

February 2, 1998

STID#4419

Ms. Irene Poulakidas
Mr. Michael Manetas
156 Gold Mine Drive
San Francisco, CA 94131

Subject: FORMER SIMAS STATION, 14180 EAST 14TH STREET,
SAN LEANDRO, CA 94607

Dear Ms. Poulakidas and Mr. Manetas,

This document is being written to memorialize a meeting that took place on January 30, 1998, at the office of your consultant of record, Azure Environmental. At this time discussions concerning the field testing of the Oxygen Release Compound (ORC), and the physical installation of such system, were undertaken.

This office commends the steps taken to treat the subject plume, and looks forward to positive results on the matter. Please have your consultant forward the analytical results following the completion of the field testing.

If you have any questions, please contact this office. The number is (510) 567-6737.

Sincerely,

Brian P. Oliva, REHS, REA,
Hazardous Materials Specialist

c: Jeff Hennier, Azure Environmental, 828 Mission St.,
San Rafael, CA 94901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 507

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

October 27, 1997

STID#: 4419

Irene Poulakidas
159 Gold Mine Drive
San Francisco, CA 94131

Walter Youngman
1981 N. Broadway, #300,
Walnut Creek, CA 94596

**Subject: Former Simas Brothers Station, 14180 East 14th Street,
San Leandro, CA 94578**

To Whom it May Concern:

This office has received and reviewed the "Technical Memorandum Response", to the "Risk Based Corrective Action Report", for the aforementioned site, submitted on November 22, 1996, from Azure Environmental, your consultant of record. Thank you for sending the document in a timely fashion.

Upon review of the memorandum as submitted, and follow-up telecommunication with Jeff Hennier, from Azure Environmental, This office concurs with the corrective action/work proposed for the site. Please commence the activities as soon as possible.

If there are **any** changes in the scheduled work, please contact this office. If you have any questions, I can be reached at (510) 567-6737.

Sincerely,

Brian P. Oliva, REHS, REA,
Hazardous Materials Specialist

cc: Jeff Hennier, Azure Environmental, 828 Mission Avenue, San Rafael, CA 94901
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 507

STID 4419

October 7, 1996

Ms. Irene Poulakidas
Mr. Michael Manetas
159 Gold Mine Drive
San Francisco, CA 94131

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

RE: FORMER SIMAS SERVICE STATION, 14180 EAST 14TH STREET
SAN LEANDRO, CA 94607

Dear Ms. Poulakidas and Mr. Manetas,

This office recently completed a review of the case file for the above referenced San Leandro site up to and including the Azure Environmental (AE) "Risk-Based Corrective Action Evaluation Report and Site Mitigation Plan Addendum" dated August 6, 1996. **Based on a review done by this Department, the following concerns have been identified and need to be addressed within 45 days from the receipt of this letter, or no later than November 22, 1996.**

- The risk of workers being exposed to "volatiles from groundwater to indoor space" should be evaluated. If this risk is exceeded then as suggested in your risk assessment report, a efficient vapor barrier should be installed and information about the thickness of this barrier, etc., should be submitted to this Department. Although the pathway "volatilization from subsurfaces soils into outdoor air" for an onsite commercial receptor scenario was evaluated, the pathway "volatilization from groundwater into outdoor air" has not been evaluated. Hence, the risk due to this pathway should be calculated.
- The risk due to offsite contaminant migration to the residential area located at the west corner of East 14th Street and 141st Avenue has not been evaluated. Either the petroleum hydrocarbon concentrations identified on site or the probable groundwater concentrations in the residential area (using a fate and transport model) can be used to assess this risk.
- I understand in consequence to a telephone conversation that I had with the City of San Leandro Planning Department that the site is zoned for community buildings or for commercial development. According to the city, community buildings could be multiple residential dwellings and hence more information should be gathered from the City Planning Department and submitted to this Department to be sure that this site cannot be used for any residential development. If it is unknown then the most conservative exposure scenario should be used for risk evaluation.

Ms. Irene Poulakidas
Mr. Michael Manetas
RE: 14180 East 14th Street, San Leandro
October 7, 1996
Page 2 of 2

- If contamination above Tier 2 levels are to left in place, then a risk management plan that includes at a minimum the following information should be submitted:
 - 1 methods to mitigate any of the potential negative impacts posed by the contamination left on site, like capping the site, using impermeable liners, barriers, etc.
 - 2 methods to mitigate any risks posed during construction activities that may expose the contaminated soil and specifically address the risk posed to the construction workers.
 - 3 if contamination above Tier 2 levels are being left on site, then a deed notification may be needed that explains the contaminants and their respective concentrations left on site and also includes the information mentioned in the risk management plan that can be used as guidance in case of any change in ownership.

Please feel free to contact me directly at (510)567-6880 if you have any questions regarding the content of this letter.

Sincerely,



Dale Klettke, CHMM
Hazardous Materials Specialist



Madhulla Logan
Hazardous Materials Specialist

c: Jeff Hennier, Azure Environmental, 828 Mission Avenue, San Rafael, CA 94901
Kevin Graves, Regional Water Quality Control Board
Steve Marquez, UST Fund
Mike Bakaldin, San Leandro Hazardous Materials Program
Tom Peacock, LOP Manager--files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20507

Alameda County CC4580
Environmental Health Services
1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
(510)567-6700 FAX(510)337-9335

STID 4419

August 20, 1996

Ms. Irene Poulakidas
Mr. Michael Manetas
159 Gold Mine Drive
San Francisco, CA 94131

RE: FORMER SIMAS SERVICE STATION, 14180 EAST 14TH STREET
SAN LEANDRO, CA 94607

Dear Ms. Poulakidas and Mr. Manetas,

This office recently completed a review of the case file for the above referenced San Leandro site up to and including the Azure Environmental (AE) "Risk-Based Corrective Action Evaluation Report and Site Mitigation Plan Addendum" dated August 6, 1996.

The Risk Based Corrective Action (RBCA) Tier 2 evaluation resulted in the development of Tier 2 site-specific target levels (SSTLs) and point(s) of compliance. Tier 2 of the RBCA process involves the development of SSTLs based on the measured and predicted attenuation of the chemical(s) of concern (COCs) away from the source area(s) using relatively simplistic mathematical modeling.

As part of the tier 2 assessment, additional groundwater investigations resulted in the advancement and installation of off-site groundwater monitoring well AZ-8. The soil and groundwater results collected from AZ-8 were compared to Tier 2 SSTLs for a commercial/industrial receptor scenario, for the building located down-gradient from well AZ-8. Sampling results obtained from groundwater samples collected from AZ-6 were compared to Tier 2 SSTLs for a residential exposure scenario, for the property located down-gradient from well AZ-6.

During the advancement of soil boring AZ-8, the soil sample collected at a depth of 16.5 feet below grade (which exhibited a strong petroleum odor during field drilling), revealed TPHg and benzene at concentrations of 0.3 mg/kg and 0.032 mg/kg, respectively. **Comparison of Site soil data with the estimated Tier 2 SSTLs indicate residual benzene concentrations in soil do not exceed the SSTLs.**

Groundwater sampling results obtained from the newly-installed well AZ-8 revealed concentrations of TPHg (42 mg/L), benzene (3.9 mg/L), toluene (0.41 mg/L), ethylbenzene (1.1 mg/L) and total xylenes (2.3 mg/L). Groundwater sampling results obtained from well AZ-6 revealed concentrations of TPHg (24 mg/L), benzene (0.21 mg/L), toluene (0.15 mg/L), ethylbenzene (0.7 mg/L) and total xylenes (0.38 mg/L). **Comparison of Site groundwater data with the estimated Tier 2 SSTLs indicate benzene concentrations in groundwater exceed the SSTLs.**

Ms. Irene Poulakidas
Mr. Michael Manetas
RE: 14180 East 14th Street, San Leandro
August 20, 1996
Page 2 of 3

The Azure Environmental ASTM Tier 2 environmental risk assessment is currently in the process of being reviewed by Madhulla Logan of this office. The risk assessment review should be completed within a 2-4 week period, and any questions or comments concerning the risk assessment should be directed to Madhulla Logan.

As part of the Site Mitigation Plan Addendum, passive remedial action measures are recommended to enhance biodegradation and further reduce the benzene concentrations in groundwater to concentrations below the Tier 2 SSTLs. Installation of oxygen-releasing compounds (ORCs) are expected to enhance biodegradation of benzene in groundwater to levels below the target SSTLs. Azure Environmental recommends that wells AZ-1 through AZ-4, AZ-6 and AZ-8 are used to distribute the ORCs.

However, there is growing evidence that ORCs distributed through groundwater monitoring wells may foul well screens, therefore limiting the beneficial impact to the immediate area of the monitoring wells. In addition, the monitoring wells were not constructed for the purpose of distributing ORCs and may interfere somewhat with obtaining representative samples for future groundwater monitoring events. Finally, the location of current groundwater monitoring wells are not ideally situated in areas of highest soil/groundwater contamination.

Possibly, a more effective implementation of the ORCs, may involve installing a grid of boreholes to attenuate the highest concentrations (the source) of petroleum hydrocarbons found in the vicinity of the former UST pit, with subsequent confirmation of ORC effectiveness by continued groundwater monitoring. This would result in the ORC compound being more effectively distributed in the areas where soil and groundwater petroleum hydrocarbon concentrations are highest, resulting in higher contaminant mass removal rates and ORC system efficacy.

Therefore, please submit to this office a work plan detailing the implementation of an appropriate ORC system. This work plan is due within 30 days of the date of this letter, or no later than September 20, 1996. I understand that the ORC system will be implemented after pre-approval from the SWRCB's UST Cleanup Fund.

As recommended by Azure Environmental, additional measures required to monitor the rates and effectiveness of biodegradation at the Site should be added to the on-going groundwater monitoring program. **Beginning with the next quarterly groundwater sampling event, additional monitoring parameters should include dissolved oxygen, ferrous iron, nitrate and sulfate levels for sampling of all on-site and off-site wells.**

Please be advised that this letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267(b) and Health and Safety Code Sections 25299.37 and 25299.78.

Ms. Irene Poulakidas
Mr. Michael Manetas
RE: 14180 East 14th Street, San Leandro
August 20, 1996
Page 3 of 3

Please feel free to contact me directly at (510)567-6880 if you have any questions regarding the content of this letter.

Sincerely,



Dale Klettke, CHMM
Hazardous Materials Specialist

c: Jeff Hennier, Azure Environmental, 828 Mission Avenue, San Rafael, CA 94901
Steve Marquez, UST Fund
BC Mike Bakaldin, San Leandro Hazardous Materials Program
Tom Peacock, LOP Manager--files

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 507

Alameda County CC4580
Environmental Health Services
1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
(510)567-6700 FAX 337-9335

STID 4419

May 16, 1996

Ms. Irene Poulakidas
Mr. Michael Manetas
159 Gold Mine Drive
San Francisco, CA 94131

RE: FORMER SIMAS SERVICE STATION, 14180 EAST 14TH STREET
SAN LEANDRO, CA 94607

Dear Ms. Poulakidas and Mr. Manetas,

This office recently completed a review of the case file for the above referenced San Leandro site up to and including the Azure Environmental (AE) "Proposal to Conduct ASTM Tier 2 Evaluation" dated May 13, 1996.

This Risk Based Corrective Action (RBCA) Tier 2 evaluation proposal provides the framework for the development of site-specific target levels (SSTLs) and point(s) of compliance. Tier 2 of the RBCA process involves the development of SSTLs based on the measured and predicted attenuation of the chemical(s) of concern (COCs) away from the source area(s) using relatively simplistic mathematical modeling.

This RBCA process utilizes a tiered approach where assessment and remediation activities are appropriately tailored to site-specific conditions and risks whose flexibility allows for a more cost-effective approach for petroleum fuel releases. These Tier 2 SSTLs are based on achieving similar levels of protection of human health and the environment. In a Tier 2 risk assessment, non-site-specific assumptions and point(s) of exposure used in Tier 1 are replaced with site-specific data and information.

AE's preliminary review of Tier 2 evaluation data requirements indicated the need for additional site assessment data for off-site receptors. This additional information is to confirm petroleum hydrocarbon concentrations at off-site groundwater grab sampling location HP-7, and requires the installation of one (1) additional groundwater monitoring well (AZ-8). The newly installed well will be hydraulically tested to obtain representative estimates of hydraulic parameters for the shallow groundwater zone at the site.

In addition to the hydraulic testing of well AZ-8, additional useful soil parameters which are easily obtained would include testing for fractional organic carbon content (sorption), porosity and water content (molecular diffusion), and bulk density. Groundwater parameters which may be useful in the Tier 2 Evaluation include dissolved oxygen concentrations inside and outside of the dissolved plume, which may indicate some level of aerobic biodegradation.

Ms. Irene Poulakidas
Mr. Michael Manetas
RE: 14180 East 14th Street, San Leandro
May 16, 1996
Page 2 of 2

This Tier 2 risk-based site evaluation is approved. Please provide a copy of the Tier 2 Evaluation report to this office within 60 days of the date of this letter, or no later than July 16, 1996.

Please feel free to contact me directly at (510)567-6880 if you have any questions regarding the content of this letter.

Sincerely,



Dale Klettke, CHMM
Hazardous Materials Specialist

c: Jeff Hennier, Azure Environmental, 828 Mission Avenue, San Rafael, CA 94901
Kevin Graves, Regional Water Quality Control Board
Steve Marquez, UST Fund
Mike Bakaldin, San Leandro Hazardous Materials Program
Tom Peacock, LOP Manager--files

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ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO# 507

RAFAT A. SHAHID, DIRECTOR

STID 4419

March 27, 1996

Ms. Irene Poulakidas
Mr. Michael Manetas
159 Gold Mine Drive
San Francisco, CA 94131

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

RE: FORMER SIMAS SERVICE STATION, 14180 EAST 14TH STREET
SAN LEANDRO, CA 94607

Dear Ms. Poulakidas and Mr. Manetas,

This office recently completed a review of the case file for the above referenced San Leandro site up to and including the Azure Environmental (AE) "Preliminary Site Assessment Report and Site Mitigation Plan" dated March 22, 1996.

As summarized in the March 22, 1996 Azure Environmental report (page 9), groundwater investigation results indicate that the extent of benzene in groundwater is restricted to the area within approximately 250 feet down gradient of the site. In addition, the groundwater investigation data indicate that the petroleum hydrocarbon plume appears to be stabilized. An evaluation of the potential exposure pathways and comparison of site soil data with ASTM risk-based screening levels (RSBLs) indicate residual benzene levels at the site do not exceed the ASTM RSBLs (table 4). However, documented soil concentrations (12 ppm-benzene) for the commercial/industrial scenario for the exposure pathway "Soil Volatilization to Outdoor Air" exceeds the Regional Water Quality Control Board (RWQCB) modified ASTM RSBL of 1.3 ppm-benzene for a 10⁻⁵ target level (1 in 100,000). Generally, Alameda County Health Care Services Agency recommends that a target level of 10⁻⁵ be used for commercial/industrial sites and a 10⁻⁶ (1 in 1,000,000) target level for residential site receptor scenarios.

In addition, lacking from the AE report was an evaluation of the exposure pathway "Groundwater-Vapor Intrusion from Groundwater to Buildings". This exposure pathway needs to be evaluated in the vicinity of hydro punch location HP-7, which detected 42 ppm-benzene from the grab groundwater sample collected on 8/29/94, and is up gradient of the buildings on the corner of 141st Avenue and East 14th Street. The RWQCB modified ASTM RSBL of 0.21 ppm-benzene is exceeded at points down gradient of hydro punch location HP-7.

This Risk-Based Corrective Action (RBCA) process utilizes a tiered approach where assessment and remediation activities are appropriately tailored to site-specific conditions and risks whose flexibility allows for a more cost-effective approach for petroleum fuel releases.

Ms. Irene Poulakidas
Mr. Michael Manetas
RE: 14180 East 14th Street, San Leandro
March 27, 1996
Page 2 of 2

At this time you are requested to have a qualified consultant evaluate the human health risk following the modified RWQCB ASTM Tier 2 standard approach to assure that all gasoline constituents currently exceeding Tier 1 RBSLs are within acceptable levels for the protection of human health. This Tier 2 evaluation provides the framework for the development of site-specific target levels (SSTLs) and point(s) of compliance. These Tier 2 SSTLs are based on achieving similar levels of protection of human health and the environment. In a Tier 2 risk assessment, non-site-specific assumptions and point(s) of exposure used in Tier 1 are replaced with site-specific data and information. **Please be advised that additional site-assessment data may be needed.** If these levels are not deemed appropriate, you will be required to provide a work plan detailing additional risk-based corrective action to be performed to remediate this site to such acceptable levels, or otherwise mitigate perceived risk.

This Tier 2 risk-based site evaluation is due no later than 90 days from the date of this letter, or by June 26, 1996.

In addition, at this time please adhere to a **quarterly** schedule of well sampling, monitoring, and report submittal as referenced in Title 23, California Code of Regulations (CCR) section 2652(d) for monitoring wells AZ-1, AZ-2, AZ-3, AZ-5 and AZ-7. In addition, cross gradient wells AZ-4 and AZ-6 are to be sampled on a **semi-annual** basis. Please have these groundwater samples analyzed for total petroleum hydrocarbons as gasoline, the aromatic hydrocarbons benzene, toluene, ethyl benzene and total xylene isomers (BTEX) and methyl-tert butyl ether (MTBE). **Initially, please have all seven (7) wells analyzed for the presence of MTBE.** In addition, for this site to qualify for classification as a "Low-Risk Groundwater Site", documentation is needed to substantiate that in-situ micro-organisms are effective in attenuating the petroleum hydrocarbon plume (natural attenuation). Comparison of background and hydrocarbon plume concentrations of inorganic ions such as oxygen, iron, nitrate, sulfate, and others, can provide evidence of biodegradation (natural attenuation) at any given site. This data may not be required to determine plume stability but can supplement other lines of evidence.

Please feel free to contact me directly at (510)567-6880 if you have any questions regarding the content of this letter.

Sincerely,



Dale Klettke, CHMM
Hazardous Materials Specialist

c: Jeff Hennier, Azure Environmental, 828 Mission Avenue, San Rafael, CA 94901
Kevin Graves, Regional Water Quality Control Board
Mike Bakaldin, San Leandro Hazardous Materials Program
Tom Peacock, LOP Manager--files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0507

RAFAT A. SHAHID, DIRECTOR

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

December 8, 1995

Mr. Robert Jones
142 Joaquin Street
San Leandro, CA 94577

**Re: Request for Access to Install Monitoring Well on at
14255 East 14th Street, San Leandro, CA**

Dear Mr. Jones:

Our office has been overseeing the on-going subsurface investigation of the petroleum fuel release at a site located at 14180 East 14th Street in San Leandro. This site is located just north of 14255 East 14th Street and upgradient based on groundwater flow direction. During the course of the investigation of this site, it appears that there is a potential of petroleum groundwater contamination migrating across East 14th Street and onto the 14255 East 14th Street site. Therefore, our office has requested that the Poulakidas and Manetas property (14180 East 14th Street) install an offsite well on the 14255 East 14th Street property site in order to determine the extent of the petroleum contamination in groundwater, if any. As referenced in a letter dated October 24, 1995, Jeff Hennier of Azure Environmental has requested property access from yourself. This letter confirms the County's position that this offsite is necessary to determine the limit of the fuel release from the Poulakidas and Manetas property.

Please be advised that as the local implementing agency delegated by the Water Board to oversee the remediation of sites which have experienced fuel releases from underground tanks, the investigation and cleanup of said sites must be consistent with the provisions of Title 23, California Code of Regulations and the Porter-Cologne Water Quality Control Act (Water Code). Specific to the Water Code, Resolution No. 92-49 has been published by the State Water Resources Control Board to state the **Policies and Procedures for the Investigation of Discharges to the Water**. Within this policy the discharger, in this instance the Poulakidas and Manetas property, is required to extend the investigation and cleanup to **any** (bold added) location affected by the discharge or threatened discharge. The Regional Water Board has the authority to require uncooperative landowners and tenants of affected property to cooperate or, if necessary, to participate in investigation, cleanup and abatement.

Our office recommends your cooperation in allowing the Poulakidas and Manetas property to access your 14255 East 14th Street property for the purpose of installing an offsite monitoring well. Should this access be denied, you may be requested to perform your own investigation at your own expense.


Mr. Robert Jones
142 Joaquin Street
December 8, 1995
Page 2 of 2

Please contact me at (510) 567-6880 should you have any questions regarding this letter.

Sincerely,



Dale Klettke, CHMM
Hazardous Materials Specialist

c:  Gil Jensen, Alameda County District Attorneys Office
Jeff Hennier, Azure Environmental, 1001 Lincoln Avenue, San Rafael, CA 94901
Irene Poulakidas, 159 Gold Mine Drive, San Francisco, CA 94131

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0507

RAFAT A. SHAHID, Assistant Agency Director

STID 4419

Alameda County CC4530
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577

March 14, 1995

Mr. Jeff Hennier
Azure Environmental
1001 Lincoln Avenue
San Rafael, CA 94901

RE: (FORMER) SIMAS BROS. SERVICE STATION, 14180 EAST 14TH
STREET, SAN LEANDRO

Dear Mr. Hennier:

I have evaluated the January 19, 1995 Azure Environmental letter report and proposal for the installation of off-site wells. The cited document was submitted in the wake of, and to document, the preliminary off-site ground water study performed during May and August 1994. The number and locations of permanent off-site wells were modified in an amended Azure Environmental letter proposal dated February 22, 1995.

The cited off-site well installation proposal has been accepted as amended. Please contact me at 510/567-6783 when field work is slated to begin.

Sincerely,


Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director
Mike Bakaldin, San Leandro Fire Department
Peter Johnson, Johnson Associates
900 Galvin Drive
El Cerrito, CA 94530
Irene Poulakidas, 159 Gold Mine Drive
S.F., CA 94131
Walter Youngman, Youngman & Ericsson
1981 N. Broadway, #300
Walnut Creek, CA 94596

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0507

RAFAT A. SHAHID, Assistant Agency Director

STID 4419

August 17, 1994

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

Mr. Jeff Hennier
Azure Environmental
1001 Lincoln Avenue
San Rafael, CA 94901

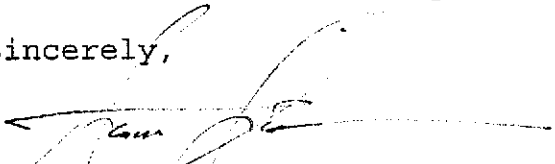
RE: (FORMER) SIMAS BROS. SERVICE STATION, 14180 EAST 14TH
STREET, SAN LEANDRO

Dear Mr. Hennier:

I have completed review of the August 2, 1994 Azure Environmental work plan for the completion of an additional phase of the qualitative off-site investigation. This proposed phase of work will supplement the previous off-site study performed during May 1994, and aid in the siting of an appropriate array of permanent well points.

The cited Azure work plan has been accepted as submitted. Please contact me at 510/567-6783 when access has been granted and field work is confirmed to begin.

Sincerely,


Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Mike Bakaldin, San Leandro Fire Department
Robert Weston, ACDEH
Donna Turcotte, SWRCB
Peter Johnson, Johnson Associates
900 Galvin Drive
El Cerrito, CA 94530
Irene Poulakidas, 159 Gold Mine Drive
S.F., CA 94131
Walter Youngman, Youngman & Ericsson
1981 N. Broadway, #300
Walnut Creek, CA 94596

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0507

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

STID 4419

July 23, 1993

Mr. Peter Johnson
Johnson Associates
900 Galvin Drive
El Cerrito, CA 94530

RE: (FORMER) SIMAS BROTHERS SERVICE STATION, 14180 E. 14TH
STREET, SAN LEANDRO

Dear Mr. Johnson:

This office has completed review of the April 19, 1993 Azure Environmental preliminary site assessment (PSA) work plan, as submitted under Azure cover also dated April 19, 1993. We have additionally reviewed the July 20, 1993 revisions to the cited work plan, submitted by Azure in response to our conference call on July 14, 1993.

The noted PSA work plan has been accepted as revised. Please contact this office when field work has been scheduled to begin. I may be reached at 510/271-4530.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Mike Bakaldin, San Leandro Fire Department
Robert Weston, ACDEH
Irene Poulakidas
Walter Youngman, Youngman & Ericsson
files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0507

STID 4419

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

February 3, 1993

Ms. Irene Poulakidas
Mr. Michael Manetas
159 Gold Mine Drive
San Francisco, CA 94131

NOTICE OF VIOLATION

RE: (FORMER) SIMAS BROS. SERVICE STATION, 14180 - E. 14TH
STREET, SAN LEANDRO

Dear Ms. Poulakidas and Mr. Manetas:

You were initially advised in correspondence dated July 10, 1991 to submit a preliminary site assessment (PSA) work plan. This request followed this department's review of several environmental reports documenting work performed following closure of four (4) underground storage tanks at your site during 1986. The referenced reports substantiate that a significant Unauthorized Release of fuel hydrocarbons occurred at the subject site.

The referenced PSA work plan was initially due for submittal by August 25, 1991. Your attorney, Mr. William G. Lewis, following an August 23, 1991 meeting to discuss a (then) pending lawsuit regarding environmental issues at the site, requested an extension to the PSA work plan submittal date. The due date was extended until November 6, 1991, or approximately 30 days beyond the expected October 7 court date. This extension was memorialized in correspondence from this office dated August 26, 1991.

In correspondence dated November 4, 1991, Mr. Sakee Poulakidas requested an extension to the November 6 PSA work plan due date, citing a delay in the case being heard by the court, among other facts. In closing, Mr. Poulakidas assured this department of the desire to comply with the PSA proposal request as quickly as possible.

On April 10, 1992, I received a telephone call from an individual identifying himself as Mr. Jack May of Western Land Company. Mr. May communicated to me that he was working with Ms. Poulakidas on

Ms. Poulakidas and Mr. Manetas
RE: 14180 - E. 14th St.
February 3, 1993
Page 2 of 2

the PSA required for the site. Mr. May further indicated that the PSA work plan would be submitted within approximately 30 days. To date, no such PSA work plan has been submitted.

Presently you are in violation of Section 2722(c)(1) of Title 23, California Code of Regulations, among others, for failure to submit the requested work plan. Additionally, you were advised in each of the two prior notices that the PSA work plan was a request for technical reports pursuant to California Water Code Section 13267(b), and that failure to respond would result in the referral of your case to the appropriate agency for enforcement action.

Please be advised that should you fail to appropriately respond to this notice by way of submittal of the requisite PSA work plan, your case will be referred to the Alameda County District Attorney's Office for enforcement action. Please be further advised that the District Attorney's Office is being advised of this case by way of copy of this letter.

A PSA work plan must be submitted to this office within 45 days of the date of this letter, or by **March 22, 1993**.

Please feel free to call me at 510/271-4320 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
John Jang, RWQCB
Mike Bakaldin, San Leandro Fire Department
Robert Weston, ACDEH
Walter Youngman, Youngman & Ericsson, 1981 N. Broadway,
Ste. 300
P.O. Box 5293
Walnut Creek 94596

Ed Howell - files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

R0507

August 26, 1991

DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Program

30 Swan Way, Rm. 200

Oakland, CA 94621

(415)

Ms. Irene Poulakidas
159 Gold Mine Drive
San Francisco, CA 94131

RE: PRELIMINARY SITE ASSESSMENT PROPOSAL; FORMER SIMAS SERVICE
STATION, 14180 EAST 14TH STREET, SAN LEANDRO, ALAMEDA COUNTY

Dear Ms. Poulakidas:

On August 23, this Department met with your attorney, Mr. William Lewis, to discuss the facts associated with the history of the site and pending civil action against the site's former operator, Mr. Walter Simas. Mr. Lewis indicated that the case will be heard October 7, 1991 in Alameda County Superior Court, and expressed confidence that a judgement would be rendered by the court in your favor. Mr. Lewis further indicated that this judgement would provide the necessary funds to perform a preliminary site assessment (PSA) of the referenced San Leandro property, as mandated by the July 10, 1991 notice from this Department. We understand that the subject property is currently owned by yourself and Mr. Michael Manetas, heirs to the estate of the late Georgia Manetas.

The due date for submittal of a PSA proposal, as outlined in the cited July 10 notice, has been extended until 30 days beyond the October 7 court date, or by **November 6, 1991**. Please be advised, however, that, should the court not rule your in favor, the due date for submittal of the PSA proposal shall remain the same.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a late response could result in the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Should you have any questions about the content of this letter, please call me at 415/271-4320.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Howard Hatayama, TSCD
Mike Bakaldin, San Leandro Fire Department
William Lewis, Esq.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0507

Certified Mailer # P 367 604 574

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

July 10, 1991

Ms. Georgia Manetas
c/o Sakee Poulakidas
159 Gold Mine Drive
San Francisco, CA 94131

RE: REQUEST FOR PRELIMINARY SITE ASSESSMENT; FORMER SIMAS
SERVICE STATION, 14180 EAST 14TH STREET, SAN LEANDRO, ALAMEDA
COUNTY

Dear Ms. Manetas:

This Department has recently received copies of the following environmental reports which pertain to the referenced San Leandro property: 1) an August 8, 1986 revised Brown and Caldwell laboratory analyses report, as submitted under cover from Sakee Poulakidas, which documents the initial soil contamination levels following closure of four (4) underground storage tanks (UST) at the referenced site, presumably during July 1986; and, 2) a September 28, 1987 Giles Engineering Associates, Inc. report documenting the results of a limited environmental assessment performed during September 1987, a result of the proposed construction of Minit Lube facility, the scope of which included the advancement of seven (7) soil borings and the laboratory analyses of select soil samples, among other elements.

The referenced August 8, 1986 Brown and Caldwell laboratory report indicates the presence of significant hydrocarbon contamination in native soils collected from beneath the former USTs during closure activities. Total fuel hydrocarbons, among other compounds identified, ranged from a high concentration of 11,000 parts per million (ppm) to a low of 47 ppm in the fuel tank pit; samples collected from the waste oil tank pit ranged from 3300 to 30 ppm. Significant levels of other fuel components were also found in these samples.

Data presented in the September 28, 1987 Giles Engineering Associates, Inc. report identifies the presence of high concentrations of volatile organic compounds (as measured in the field using a portable photoionization detector) from soils between the depths of approximately 10-40 feet below grade (BG). Two (2) samples collected from borings 1 and 2, at depths of 13.5-15 feet and 18.5-20 feet BG, respectively, exhibited total petroleum hydrocarbon concentrations of 6040 and 2080 ppm. Significant levels of other fuel components were also found in these samples. Based upon this data, the cited Giles Engineering report recommended the installation of ground water monitoring wells, additional soil borings and chemical analyses as elements of a continued environmental investigation.

Ms. Georgia Manetas
RE: 14180 E. 14th Street, San Leandro
July 10, 1991
Page 2 of 4

The data presented in the two cited reports clearly indicate that there has been a confirmed release at this site. As a result, you must perform an additional environmental investigation to determine the lateral and vertical extent of both soil and ground water contamination associated with this release.

Such an investigation shall be in the form of a Preliminary Site Assessment, or PSA. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks. The major elements of such an investigation are summarized in the attached Appendix A.

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

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

The PSA proposal is due within 45 days of the date of this letter, or by August 25, 1991. Once this proposal has been reviewed and approved, work should commence no later than September 25, 1991. Accompanying this proposal must be a check payable to Alameda County totalling \$1074 to offset expenses incurred by this Department during oversight of this project. This deposit is placed into an account from which money is drawn at the current rate of \$67 per hour as time is dedicated to the project.

A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports must be submitted quarterly until this site qualifies for final RWQCB "sign off". Such quarterly reports are due the first day of the second month of each subsequent quarter (i.e., November 1, February 1, May and August 1).

Ms. Georgia Manetas
RE: 14180 E. 14th Street
July 10, 1991
Page 3 of 4

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

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

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

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a late response could result in the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Should you have any questions about the content of this letter, please call me at 415/271-4320.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

enclosure

Ms. Georgia Manetas
RE: 14180 E. 14th Street
July 10, 1991
Page 4 of 4

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Howard Hatayama, DHS
Mike Bakaldin, San Leandro Fire Department
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0507

July 2, 1991

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

Ms. Arlene Segal
McCabe, Schwartz, Evans, Levy & Dawe
One Concord Centre
2300 Clayton Road, Suite 1500
Concord, CA 94520

RE: 14180 EAST 14TH STREET, SAN LEANDRO, ALAMEDA COUNTY

Dear Ms. Segal:

It was a pleasure to meet with you on June 28 to discuss the environmental issues associated with the referenced San Leandro site. As we discussed, you will be billed for this service and the copies provided of the subject site file contents. Attached please find a copy of the invoice sent to our Billing Unit.

The information provided and discussed during the June 28 meeting was limited to that information available to this Department as of that date, and does not reflect information available to other agencies potentially involved with this case.

Should you have any additional questions, please call me at 415/271-4320.

Sincerely,

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

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Rafat Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

DAVID J. KEARS AGENCY

~~XXXXXXXXXXXX~~ Agency Director



R0507

470-27th Street, Third Floor
Oakland, California 94612
(415)874-7237

September 23, 1987

Ms. Georgia Manetas
c/o Sakee Poulakidas
159 Gold Mine Drive
San Francisco, CA 94131

Dear Ms. Manetas:

This letter is being written at the request of Mr. James Tsukamoto of Kerry and Associates, concerning your property at 14180 East 14th Street, San Leandro.

Our files for 14180 East 14th Street, include a letter to Mr. Ted Gerow, PHE, Alameda County Health Dept. and attachments to indicate that (1) 94 yards of contaminated materials were removed from the site to Casmalia Resources Disposal Site and (2) that samples taken after removal were less than 5mg/kg of volatile hydrocarbons as tested by Trace Analysis Laboratory, Inc.

If you have any questions, please contact Edgar B. Howell, III, Senior Hazardous Materials Specialist, at 874-7237.

Sincerely,

Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:EBH:mnc

cc: Joe Ferrero, SLFD
James Tsukamoto, Kerry and Associates