

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



GIBSON PAINT CO/SCREEN

1199 E. 12th St.

OAKLAND, CA

RO#634

StID 235

March 17, 1998

Mr. Li Sun  
Golden Value Inc  
530 MacDonald  
Richmond, CA 94801

Mr. Donald Gibson  
Donald & Majorie Gibson Trust  
1175 Clarendon Crescent  
Oakland, CA 94610

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

**RE: Address Correction**

Dear Messrs. Sun and Gibson:

Enclosed is a revised cover letter correcting my letter dated March 9, 1998. This letter contains the correct site address where site remediation has been completed. Sorry for any inconveniences my error may have caused.

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

Sincerely,

eva chu  
Hazardous Materials Specialist

c: Frank Kliewer  
City of Oakland-Planning  
1330 Broadway, 2nd Floor  
Oakland, CA 94612

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RO#634

StID 235

January 21, 1998

Mr. Donald Gibson  
1175 Clarendon Crescent  
Oakland, CA 94610

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

**RE: Well Decommission at 1199 E 12th Street, Oakland, CA**

Dear Mr. Gibson:

This office and the San Francisco RWQCB have reviewed the case closure summary for the above referenced site and concur that no further action related to the underground tank release is required at this time. Before a remedial action completion letter is sent, the onsite monitoring wells (MW-1 through MW-4) should be decommissioned, if they will no longer be monitored. Please notify this office upon completion of well destruction so a closure letter can be issued.

Well destruction permits may be obtained from Alameda County Public Works. They can be reached at (510) 670-5575.

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

Sincerely,

eva chu  
Hazardous Materials Specialist

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO#634

STID 0235

October 9, 1996

Mr. Donald Gibson  
1175 Claredon Crescent,  
Oakland, CA 94610

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

RE: 1199 EAST 12TH STREET, OAKLAND, CALIFORNIA 94606

Dear Mr. Gibson:

This office is in receipt of and has completed review of the case file for this site, up to and including the September 11, 1996 ACC Environmental Consultants (ACC) "Quarterly Groundwater Monitoring Report".

Laboratory analysis of groundwater samples collected from monitoring wells MW-1, MW-2 and MW-4 have shown non-detectable concentrations of benzene, toluene, ethyl benzene, total xylenes (BTEX), for several consecutive quarters. ACC has recommended in the 9/11/96 report that the site be evaluated for closure.

Alameda County Department of Environmental Health (ACDEH) has reviewed the file for case closure. At the present time, this site does not warrant case closure for the following reasons:

- ◆ Although the Chronic Hazard Quotient (CHQ) for toluene in drinking water is 7.3 mg/L (7,300 ug/L), California's Primary Drinking Water Maximum Contaminant Level for toluene is 1.0 mg/L (1000 ug/L).
- ◆ Laboratory results for the groundwater sample (well MW-3) collected on 1/26/96, exceeded the CHQ for toluene. Additional confirmatory groundwater sampling will be required by this office.
- ◆ The human health and environmental risk associated with the concentrations of chlorinated hydrocarbons historically detected in groundwater samples collected at this site has not been evaluated.

**Therefore, at this time please adhere to the following schedule of well sampling, monitoring, and report submittal:**

- 1) Semi-annual monitoring and report submittal for well MW-3 should be performed in the first quarter (seasonally high groundwater elevation) and third quarter (seasonally low groundwater elevation), **beginning with the first quarter 1997.**
- 2) For wells MW-1, MW-2 and MW-4 please adhere to a revised **annual (1st quarter)** schedule of well sampling, monitoring, and report submittal, **beginning with the first quarter 1997.**

Mr. Donald Gibson  
RE: 1199 East 12th Street  
October 9, 1996  
Page 2 of 2

3) Groundwater elevation and groundwater gradient measurements for wells MW-1 through MW-4 should be performed on a semi-annual basis, **beginning with the first quarter 1997.**

Sample analytes shall continue to be EPA Method 624 compounds, including BTEX. **In addition, groundwater samples should be analyzed for the presence of methyl-tert-butyl-ether (MTBE).**


After review of the 1st quarter 1997 groundwater monitoring report, this case will again be evaluated for case closure. Should you have any questions or comments, please feel free to call me directly at (510)567-6880.

Sincerely,



Dale Klettke, CHMM  
Hazardous Materials Specialist

c: Misty C. Kaltreider, c/o ACC Environmental Consultants, 7977 Capwell Drive, Suite 100,  
Oakland CA 94621

 Thomas Peacock, LOP Manager--files  
0235sche.red

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



Gibson Paint Co./Screen Process  
1199 E. 12th. St. Oakland

R0634

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6700

September 20, 1995  
STID #235

Mr. Donald Gibson  
Donald & Marjorie Gibson Trust  
1175 Clarendon Crescent  
Oakland, CA 94610

Dear Mr. Gibson:

This office has received and reviewed a Quarterly Monitoring Report dated July 5, 1995 by ACC Environmental Consultants. The following are comments concerning this report, which is acceptable:

1. This office accepts the recommendations on page 9, including the reduction of monitoring to biannual. Any closure of the site will depend on what the finding were during that year.
2. The second paragraph of 6.0 Recommendations should be changed to reflect that **four** monitoring wells are being sampled rather than three.

Please contact me at (510) 567-6782 should you have any questions regarding this letter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas Peacock".

Thomas Peacock, Manager  
Division of Environmental Protection

c: Li Sun, Golden Valve, Inc., 530 MacDonald, Richmond, CA 94801  
George Young, Acting Chief - Files  
April Hamilton, ACC Environmental Consultants, 1000  
Atlantic Ave., Suite 110, Alameda, CA 94501

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



# 1199 E. 12th St  
Oakland, CA

R0634

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6700

May 25, 1995  
STID #235

Mr. Donald Gibson  
Donald & Marjorie Gibson Trust  
1175 Clarendon Crescent  
Oakland, CA 94610

Dear Mr. Gibson:

This office has received and reviewed an additional soil and groundwater investigation report dated April 11, 1995 by ACC Environmental Consultants. The following are comments concerning this report, which is acceptable:

1. This office disagrees with the background comments in the second to last paragraph on page 1. This may be an old comment but at this time there is no evidence that any of the reported contamination has come from an off site source.
2. The recommendations section of page 8 should be changed to reflect that **four** monitoring wells are being sampled rather than three.
3. The comment in conclusions on page 8 seems much more reasonable concerning weathering, biotransforming, and degrading products. There certainly is also the fact of contaminants that are very closely related chemically and may be present in any industrial grade product.

Please contact me at (510)567-6782 should you have any questions regarding this letter.

Sincerely,

Thomas Peacock, Supervising HMS  
Division of Environmental Protection

cc: Li Sun, Golden Valve, Inc., 530 MacDonal, Richmond, CA 94801  
Mee Ling Tung, Acting Chief - Files  
Misty Kaltreider, ACC Environmental Consultants, 1000  
Atlantic Ave., Suite 110, Alameda, CA 94501

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0634

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program

November 9, 1994  
STID #235

Mr. Donald Gibson  
Donald & Marjorie Gibson Trust  
1175 Clarendon Crescent  
Oakland, CA 94610

ALAMEDA COUNTY CC4580  
DEPT. OF ENVIRONMENTAL HEALTH  
ENVIRONMENTAL PROTECTION DIVISION  
1131 HARBOR BAY PKWY., #250  
ALAMEDA CA 94502-6577

Dear Mr. Gibson:

This office has received and reviewed a Workplan for Groundwater Investigation and Monitoring Well Installation dated October 1994 by ACC Environmental Consultants. The following are comments concerning this workplan, which is acceptable:

1. This office questions placing another upgradient well on this parcel as the sampling of MW1 and MW2, which are up or cross gradient to the former tank pit, has shown contamination levels 1 to 2 orders of magnitude below that of MW3, the down gradient well.
2. The location of the 2 additional down gradient wells seems questionable as they are dispersed in such a small radius and are closer to each other than to MW3.

Please contact me at (510)567-6782 should you have any questions regarding this letter. Notice that our office has moved.

Sincerely,

Thomas Peacock, Supervising HMS

cc: Li Sun, Golden Valve, Inc., 530 MacDonald, Richmond, CA 94801  
Edgar Howell, Chief - Files  
Misty Kaltreider, ACC Environmental Consultants, 1000  
Atlantic Ave., Suite 110, Alameda, CA 94501

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0634

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program

November 8, 1994  
STID #235

Mr. Donald Gibson  
Donald & Marjorie Gipson Trust  
1175 Clarendon Crescent  
Oakland, CA 94610

ALAMEDA COUNTY CC4580  
DEPT. OF ENVIRONMENTAL HEALTH  
ENVIRONMENTAL PROTECTION DIVISION  
1131 HARBOR BAY PKWY., #250  
ALAMEDA CA 94502-6577

Dear Mr. Gibson:

This office has received and reviewed a Quarterly Groundwater Monitoring report dated September 1994 by Dennis Bates Associates. The following are comments concerning this report:

1. The recommendations on page 3 say that you will suspend sampling the wells. You are not allowed to suspend sampling of MW2 and MW1 as they were found with 2,300ppb and 250ppb of TPHg which are certainly levels of concern. You also may not go to semi-annual sampling on MW3 as it has **23,000ppb** of TPHg which is a great deal of contamination.
2. Although MW1 is the lowest level, it is not consistent to suspend its sampling while installing another up gradient well as it also is an up gradient well.
3. The recommendation is made for the installation of 2 down gradient wells which is acceptable. Their description is mentioned in another workplan which this office has received.
4. **It is expected that quarterly monitoring reports will continue to be done and sent to this office.**

lease contact me at (510) 567-6782 should you have any questions regarding this letter. Notice that our office has moved.

Sincerely,

Thomas Peacock, Supervising HMS

cc: Li Sun, Golden Valve, Inc., 530 MacDonald, Richmond, CA 94801  
Edgar Howell, Chief - Files  
John Sammon, Dennis Bates Associates, Inc., 1020 Railroad  
Ave., Suite E, Novato, CA 94945



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



SITE: 1199 E. 12th St.  
Oakland, CA 94606

R0634

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program

July 20, 1994  
STID #235

Mr. Donald Gibson  
1175 Clarendon Crescent  
Oakland, CA 94610

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY  
**DEPARTMENT OF ENVIRONMENTAL HEALTH**  
1131 HARBOR BAY PARKWAY, 2ND FLOOR  
ALAMEDA, CA 94502-6577

Dear Mr. Gibson:

This letter concerns a Proposal/Workplan for further site investigation dated June 22, 1994 by Dennis Bates Associates. The plan is acceptable. However, you mentioned this as only 1 bid of three that you need to get in you letter dated 6/27/94. Attached is a list of companies that are in this business. You may use this list or check with the phone book or other sources. Please have the company you select submit their workplan unless it is Dennis Bates as we have theirs. Please have them tell us at least 72 hours prior to implementation of field work.

Please contact me at (510) 337-2852 should you have any questions regarding this letter. As we have recently moved, the phone system is not completely installed. This will take another 6 weeks. If you have a problem with my number please call 337-2866 as the main office number.

Sincerely,

Thomas Peacock, Supervising HMS  
Local Oversight Program

CC: Edgar Howell, Chief - files

Below is a list of consultants who have worked within Alameda County performing site assessment and remediation of sites which have experienced contamination due to underground storage tanks. This is **not** an endorsement nor is it a complete list of consultants qualified to perform the environmental investigations you need. You are encouraged to look in the phone book under Environmental Consultants, Hazardous Materials and Waste Consultants, Tanks Abandoned, Well Drilling, Geologist, Geotechnical Engineers, etc.

- |     |                                       |              |
|-----|---------------------------------------|--------------|
| 1.  | Tank Protect Engineering, Union City  | 510-429-8088 |
| 2.  | Gettler-Ryan, Hayward                 | 510-783-7500 |
| 3.  | Aqua Science Engr., San Ramon         | 510-820-9391 |
| 4.  | Blymer Engineers, Alameda             | 510-521-3773 |
| 5.  | Subsurface Engineers, Oakland         | 510-268-0461 |
| 6.  | Artesian Env. Consultants, San Rafael | 415-257-4801 |
| 7.  | GeoStrategies, Hayward                | 510-352-4800 |
| 8.  | Levine Fricke, Emeryville             | 510-652-4500 |
| 9.  | Geraghty and Miller, Richmond         | 510-233-3200 |
| 10. | Certified Env. Consulting, Benicia    | 800-228-0171 |
| 11. | Weiss Assoc., Emeryville              | 510-547-5420 |
| 12. | RESNA, San Jose                       | 408-264-7723 |
| 13. | Kapraelian Engineering, Concord       | 510-602-5100 |
| 14. | Hydroenvironmental Tech., Alameda     | 510-521-2684 |
| 15. | CH2M Hill, Oakland                    | 510-251-2426 |
| 16. | Harding Lawson Assoc.                 | 415-543-8422 |
| 17. | Applied GeoScience, San Jose          | 408-452-0262 |
| 18. | ACC, Alameda                          | 510-522-8188 |
| 19. | Woodward Clyde, Oakland               | 510-893-3600 |

consultnt

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



SITE ADDRESS: 1199 E. 12th St.  
Oakland, CA

R0634

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

May 9, 1994  
STID #235

Mr. Donald Gibson  
Donald & Marjorie Gibson Trust  
1175 Clarendon Crescent  
Oakland, CA 94610

Dear Mr. Gibson:

This office has received and reviewed a Letter report dated Feb. 8, 1994 and a Quarterly Monitoring Report Dated April 1994, both by Dennis Bates Associates. The following are comments concerning these reports:

1. The first report recommends continued groundwater monitoring for the three existing monitoring wells for 4 additional quarters. The second report recommends cessation of monitoring MW-1 and MW-2. The presence of significant contamination in those wells would preclude ceasing their monitoring. All three wells must continue to be monitored and reported quarterly.
2. A good argument has been made in the first report to modify the test methods and to be more consistent as far as what is tested for. This office agrees with that approach.
3. The recommendation is made that no additional remediation is needed for this site. However, this is very premature as the lateral contamination has not been defined. While a lot of effort has been put into seeking out an off-site, upgradient source for the contamination, MW-3, continues to show very high levels of TPHg (150,000 ppb). While the tanks are known to have contained paint thinner and solvents rather than gasoline, this standard has been used because of its similarity to the solvents used. The level of 27,000 ppb of toluene (an important solvent in paint thinner) is several orders of magnitude above the 100 ppb drinking water standard. This site not only needs continued monitoring. **Additional investigation is required downgradient to determine the extent of contamination.**

Please provide a work plan addressing these items for County review within (45) days of receipt of this letter. This is a formal request of technical documents pursuant to the California Water Code Section 13267 (b) and failure to respond may subject you to civil liabilities.

Gipson Paint

STID 235

May 9, 1994

Page 2 of 2

Please contact me at (510) 271-4320 should you have any questions regarding this letter.

Sincerely,



Thomas Peacock, Supervising HMS

cc: Li Sun, Golden Valve, Inc., 530 MacDonald, Richmond, CA 94801  
Edgar Howell, Chief - Files  
John Sammon, Dennis Bates Associates, Inc., 1020 Railroad  
Ave., Suite E, Novato, CA 94945

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0634

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

June 14, 1993  
STID #235

Mr. Donald Gibson  
1175 Clarendon Crescent  
Oakland, CA 94610

Dear Mr. Gibson:

This letter concerns a letter dated 5/14/93 which you wrote this office concerning an IRS audit. It is true that remediation expenses which you have incurred subsequent to the underground tank removal at your site at 1199 E. 12th St., Oakland, 94606 are required for you to comply with several different state and federal laws. You have been required by Barney Chan of this office during the year 1991, the period in question.

Please contact me at (510) 271-4320 should you have any questions regarding this letter.

Sincerely,

Thomas Peacock, Supervising Hazardous Materials Specialist

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



SITE: 1199 E. 12th. St.  
Oakland.

R0634

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

March 15, 1993  
STID #235

Mr. Donald Gibson  
1175 Clarendon Crescent  
Oakland, CA 94610

Dear Mr. Gibson:

This letter concerns a report dated 13 November 1992 by Miller Environmental Company about the above site. In their report Miller notes that additional work needs to be done and that the next quarterly groundwater monitoring analysis needs to be done in January 1993. This would make a report **overdue now**. Please have the monitoring wells analyzed and a report submitted **within 30 days**.

As recommended in MEC's previous report of findings, additional work is required. This work should include:

1. The removal of all free floating product for the monitoring wells. Hand bailing is not sufficient and some type of pump and treat system should be considered.
2. Additional investigation to determine the lateral extent of soil and groundwater contamination must occur. Every effort must be taken to prevent offsite migration of solvents and petroleum hydrocarbons. To this end, additional borings and well(s) should be installed to determine the zero concentration line for these contaminants both in soil and in groundwater.

Please provide a work plan addressing these items for County review within (45) days of receipt of this letter. This is a formal request of technical documents pursuant to the California Water Code Section 13267 (b) and failure to respond may subject you to civil liabilities.

Please contact me at (510) 271-4320 should you have any questions regarding this letter.

Sincerely,

Thomas Peacock, Supervising Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney Office  
R. Hiatt, RWQCB  
Edgar Howell, Chief - Files  
Golden Valve Inc., ATTN: Mr. Li Sun, 530 MacDonald, Richmond,  
CA 94801

**ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY**

DAVID J. KEARS, Agency Director



R0634

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) 271-4530November 6, 1992  
STID #235Mr. Donald Gibson  
1175 Clarendon Crescent  
Oakland, CA 94610**SECOND NOTICE**

Dear Mr. Gibson:

This letter follows a letter dated March 26 from this office which required specific actions concerning the above site. As stated in Miller Environmental Company's report, dated February 10, 1992, significant petroleum hydrocarbon and solvent contamination exists in soils and groundwater at this site. Floating product was found in MW2 and MW3, with free product being present during all three water samplings of MW3. Elevated levels of acetone, methyl ethyl ketone (MEK) and methyl isobutyl ketone (MIBK) were found in MW3, the assumed downgradient well onsite. These solvents are typical of the lacquer thinner formerly stored in the 6000 gallon tank removed. Chlorinated solvents and benzene, toluene, ethyl benzene and xylenes (BTEX) were also found, some levels exceeding Maximum Contaminant Levels (MCL) established by the EPA and DOHS. Note that both benzene and methylene chloride found in water samples appear on the Proposition 65 list of chemicals known or thought to cause cancer. From the soil boring results, it is evident that petroleum hydrocarbons in the gasoline range (ie: mineral spirits or paint thinner) and chlorinated and non-chlorinated solvents exist in the soils at the groundwater/soil interface.

Recognizing your concern about offsite upgradient sources of gasoline, it is still clear that the lacquer thinner solvents and mineral spirits as reported as TPHg came from the removed tanks. The contamination has likely spread offsite as evidenced by analytical results of water samples from MW-3. In fact, MW-3 is actually cross-gradient to the former lacquer thinner tank location. As recommended in MEC's report of findings, additional work is required. This work should include:

1. The removal of all free floating product for the monitoring wells. Hand bailing is not sufficient and some type of pump and treat system should be considered.
2. Additional investigation to determine the lateral extent of soil and groundwater contamination must occur. Every effort must be taken to prevent offsite migration of

Mr. Donald Gibson  
1199 E. 12th St.  
STID #235  
November 6, 1992  
Page 2 of 2

solvents and petroleum hydrocarbons. To this end, additional borings and well(s) should be installed to determine the zero concentration line for these contaminants both in soil and in groundwater.

3. Miller Environmental Company's recommendation for performing a soil performance test to determine applicability of a vacuum extraction system is one acceptable remediation approach.

Please provide a work plan addressing these items for County review within (45) days of receipt of this letter. **To date this office has not received any more recent reports of quarterly groundwater monitoring as recommended by Miller Environmental.**

This is a formal request of technical documents pursuant to the California Water Code Section 13267 (b) and failure to respond may subject you to civil liabilities.

Please contact me at (510) 271-4320 should you have any questions regarding this letter.

Sincerely,



Thomas Peacock, Supervising Hazardous Materials Specialist

cc: M. Thomson, Alameda County District Attorney Office  
R. Ruhmke, Miller Environmental Co.  
R. Hiett, RWQCB  
Edgar Howell, Chief - Files  
Golden Valve Inc., ATTN: Mr. Li Sun, 530 MacDonald, Richmond,  
CA 94801



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0634

RAFAT A. SHAHID, Assistant Agency Director

March 26, 1992  
STID #235

Mr. Donald Gibson  
1175 Clarendon Crescent  
Oakland, CA 94610

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

Re: Response to 1/31/92 Letter and Requirement for Additional  
Subsurface Investigation at 1199 E. 12th St., Oakland 94606

Dear Mr. Gibson:

This letter responds to your 1/31/92 letter requesting information for your insurance carrier. The questions arise from the removal of the two underground storage tanks removed in May of 1990. The stockpiled soils, approximately 100 cubic yards, were found to contain soluble lead exceeding the STLC (Soluble Threshold Limit Concentration) which is 5 ppm (parts per million or mg/l).

In regards to the two other sites which either have or had underground storage tanks, Glass on the Move at 1111 E. 12th St. has removed three underground storage tanks, two being diesel and one being gasoline. All soils from the excavation are stockpiled on site and have yet to be tested for lead. Assuming these soils are disposed at a landfill, the soils will at that time be tested for lead and other parameters as required by the landfill. The property owners of 1111 E. 12th St. are obtaining bids for the installation of monitoring wells and further soil investigation.

The Baston property at 1200 E. 12th St. has two underground storage tanks formerly containing gasoline. The tanks were emptied and fees paid to temporarily permit the tanks. Mr. Baston chose to register and permit the tanks although it is more likely that the tanks will be removed. When the tanks are removed, soils will be tested for either total or soluble lead. You may contact Mr. Paul Smith, Senior Hazardous Materials Specialist, from this office for information regarding the time table for these tank removals.

In your attempt to identify potential offsite sources of gasoline and organic lead contamination, it will be necessary to verify the type as well as the source of lead. Offsite sampling from upgradient sites will be required to prove you are an affected party. If you believe that the soluble lead in your soils are background levels, offsite soil samples again will be needed. The Regional Water Quality Control Board (RWQCB)

Mr. Donald Gibson  
1199 E. 12th St.  
STID #235  
March 26, 1992  
Page 2.

policy has been not to have property owners remediate contamination clearly coming from some verified offsite source. They also have not required clean-up of contamination shown to be background levels typical of a specific area. The County as the Board's agent through a Delegation of Authority, (DOA), also maintains this policy. It is, however, the responsibility of the property owner or any other identified responsible party to show that conditions of offsite contamination exists. Supportive soil and/or ground water sampling results and possibly other historical documentation will be required for your case. This information would be examined by the County and the Regional Board for concurrence.

The reuse of stockpiled soils containing soluble lead exceeding the STLC threshold will require the consent of the RWQCB and possibly a variance from the Department of Health Services (DOHS). The RWQCB may also require a Permit for Waste Discharge which in turn would require indefinite monitoring of all monitoring wells, in addition to a risk assessment and a deed restriction. Should you want to request for on-site reuse of the stockpiled soils, or if you would like to present your case for offsite sources of contamination, it would be beneficial to meet collectively with the County and the RWQCB for agreement as to the requirements.

The County has completed the review of the report summarizing the findings of soil borings and monitoring well installations at this site. As stated in Miller Environmental Company's report, significant petroleum hydrocarbon and solvent contamination exists in soils and groundwater at this site. Floating product was found in MW2 and MW3, with free product being present during all three water samplings of MW3. Elevated levels of acetone, methyl ethyl ketone (MEK) and methyl isobutyl ketone (MIBK) were found in MW3, the assumed downgradient well onsite. These solvents are typical of the lacquer thinner formerly stored in the 6000 gallon tank removed. Chlorinated solvents and benzene, toluene, ethyl benzene and xylenes (BTEX) were also found, some levels exceeding Maximum Contaminant Levels (MCL) established by the EPA and DOHS. Note that both benzene and methylene chloride found in water samples appear on the Proposition 65 list of chemicals known or thought to cause cancer. From the soil boring results, it is evident that petroleum hydrocarbons in the gasoline range (ie mineral spirits or paint thinner) and chlorinated and non-chlorinated solvents exist in the soils at the groundwater/soil interface.

Mr. Donald Gibson  
1199 E. 12th St.  
STID #325  
March 26, 1992  
Page 3.

Recognizing your concern about offsite upgradient sources of gasoline, it is still clear that the lacquer thinner solvents and mineral spirits as reported as TPHg came from the removed tanks. The contamination has likely spread offsite as evidenced by analytical results of water samples from MW-3. In fact, MW-3 is actually cross-gradient to the former lacquer thinner tank location. As recommended in MEC's report of findings, additional work is required. This work should include:

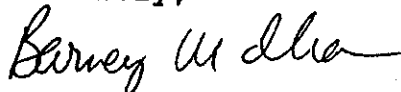
1. The removal of all free floating product for the monitoring wells. Hand bailing is not sufficient and some type of pump and treat system should be considered.
2. Additional investigation to determine the lateral extent of soil and groundwater contamination must occur. Every effort must be taken to prevent offsite migration of solvents and petroleum hydrocarbons. To this end, additional borings and well(s) should be installed to determine the zero concentration line for these contaminants both in soil and in groundwater.
3. Miller Environmental Company's recommendation for performing a soil performance test to determine applicability of a vacuum extraction system is one acceptable remediation approach.

Please provide a work plan addressing these items for County review within (45) days of receipt of this letter. The County cannot assume any offsite source or any other responsible party until we receive the Regional Board's concurrence. If offsite parties are identified, they will be notified as to their legal responsibility and you will be copied on this notification.

This is a formal request of technical documents pursuant to the California Water Code Section 13267 (b) and failure to respond may subject you to civil liabilities.

Please contact me at (510) 271-4320 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan, Hazardous Materials Specialist

cc: M. Thomson, Alameda County District Attorney Office  
R. Ruhmke, Miller Environmental Co.  
R. Hiett, RWQCB  
2-WP1199E12

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0634

May 29, 1991

Mr. Donald Gibson  
1175 Clarendon Crescent  
Oakland CA 94610

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

Re: Workplan for Remediation at 1199 E. 12th St., Oakland 94606

Dear Mr. Gibson:

Alameda County Environmental Health, Hazardous Materials Division has received Miller Environmental Company's March 18, 1991 reply to the County's approval to the initial workplan regarding remediation at the above referenced site. The newly proposed locations for the monitoring wells are acceptable with the condition that the groundwater gradient determined through these wells must verify the existence of one of these wells being down gradient to both former tank pits. If this is not the case additional well(s) will be required. Please review the County's December 6, 1990 letter to ensure all items of this letter are addressed.

Enclosed please find the returned check you issued to Alameda County for the removal of the underground tanks. Apparently, a previous check was issued for this. You are, however, requested to submit a check for \$500.00 payable to Alameda County for the continuing oversight of the remediation at this site. These monies are used at a rate of \$67/hr for the review of reports and oversight of your project and any remaining funds are reimbursed at the completion of the project. Your account is currently depleted and has a negative balance.

Again you are reminded of Section 25298 (c)(4) of the California Health and Safety Code which states that no person shall close an underground tank unless he demonstrates to the appropriate agency that the site has been investigated to determine if there are any, or were past releases, and if so, that appropriate corrective or remedial actions have been taken. Note that considerable monetary civil penalties exist for improper closure of an underground tank. Please contact me at 271-4320 should you have any questions.

Sincerely,

Barney M. Chan, Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division

Lester Feldman, SFRWQCB

R. Ruhmke, Miller Environmental Co.

E. Howell, Chief, Hazardous Materials Division

1199e12

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO634

May 28, 1991

Mr. Donald Gibson  
1175 Clarendon Crescent  
Oakland CA 94610

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

Re: Workpland for Remediation at 1199 E. 12th St., Oakland 94606

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Again you are reminded of Section 25298 (c)(4) of the California Health and Safety Code which states that no person shall close an underground tank unless he demonstrates to the appropriate agency that the site has been investigated to determine if there are any, or were past releases, and if so, that appropriate corrective or remedial actions have been taken. Note that considerable monetary civil penalties exist for improper closure of an underground tank. Please contact me at 271-4320 should you have any questions.

Sincerely,

Barney M. Chan, Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division

Lester Feldman, SFRWQCB

R. Ruhmke, Miller Environmental Co.

E. Howell, Chief, Hazardous Materials Division

1199e12

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0634

December 6, 1990

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

Mr. Donald Gibson  
1175 Clarendon Cres.  
Oakland, CA 94610

Re: Workplan for Gibson Paint, 1199 E. 12th St., Oakland CA 94606

Dear Mr. Gibson:

Thank you for the submittal of the workplan for monitoring well installation at Gibson Paint as provided by your consultant, Miller Environmental Company. In general, the workplan is acceptable however a few items in the report need clarification. These items are:

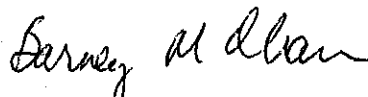
1. In the description of previous work, it was stated that the former tank located in the driveway was overexcavated. No mention was made of sampling the remaining soil. Please send all results of any samples taken after overexcavation.
2. Please inform us of the status of all stockpiled soil.
3. If the extent of soil or ground water contamination has not been determined, from the analysis of the samples from the monitoring well installation, additional wells may be required.
4. The soil samples from the monitoring well borings collected every five feet and at the soil/ground water interface and the water sample from the wells should be analyzed for TPH as gasoline, benzene, toluene, ethylbenzene and xylene (BTEX) and volatile organics by EPA method 8240.
5. The proposed ground water monitoring well locations are acceptable. In the event permits are not given for the two street locations, alternate locations must be approved by our agency.
6. The ground water monitoring wells which will be sampled monthly for the first three months should be sampled quarterly minimally thereafter.

With the submittal and acceptance of the forementioned items your workplan is accepted and work should commence immediately. You are reminded to send copies of all correspondence to the Regional Water Quality Control Board (RWQCB) in addition to our agency.

Mr. Donald Gibson  
Gibson Paint  
December 5, 1990  
Page 2.

Please contact the undersigned at 271-4320 should you have any questions concerning this letter.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney Office, Consumer  
and Environmental Protection Division  
Lester Feldman, RWQCB  
H. Hatayama, DOHS  
Reinhard Ruhmke, Miller Environmental Co.  
Edgar Howell, Chief Hazardous Materials Division

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0634

September 20, 1990

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

Mr. Donald Gibson  
1175 Clarendon  
Oakland, CA 94610

Dear Mr. Gibson:

This letter summarizes the items discussed in your September 18, 1990 meeting with Barney Chan, Hazardous Materials Specialist. The first issue concerns the fate of the soils from the underground tank removals currently being aerated at Gibson Paint, 1199 E.12th St., Oakland 94606. The landfill which accepts the remediated soil will minimally require analytical data verifying the concentration of any remaining contaminants. For soil characterization, the Air Quality Management District (AQMD) requires for every 50 cubic yards of soil, one (1) laboratory composited soil sample must be analyzed from four (4) discreet soil samples taken from equally divided sectors of the 50 cubic yards. AQMD specifies the protocol for sampling, storage and maintainance of chain of custody for the samples. Although a private individual is permitted to take these samples, these specific protocols must be followed and a Hazardous Materials Specialist must be present to witness the sampling. The samples must be composited and analyzed by a state certified hazardous materials lab. You should contact the specific landfill for any other requirements.

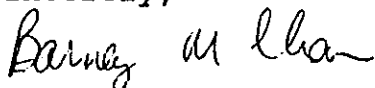
The second issue regards your response to the June 7, 1990 letter from Mr. Edgar B. Howell III, Chief, Hazardous Materials Division requesting a workplan addressing those appropriate items detailed in that letter. In this letter you were requested to submit a workplan within 30 days and that any extension of this deadline must be confirmed in writing by this Division or the Regional Water Quality Control Board (RWQCB). The County is aware that you are currently seeking a consultant but please be reminded that you are still responsible for diligent actions to protect the water of the State. Also note that section 25299.37(a) of Division 20 Chapter 6.7 of the Health and Safety Code states that each owner, operator or other responsible party shall take corrective action in response to an unauthorized release in compliance with this section and that section 25299.37(c) states that the local agency may issue an order to the owner requiring compliance with this section. Section 25298(c)(4) states that no person shall close an underground tank unless he demonstrates to the appropriate agency that the site has been investigated to determine if there are any present, or were past, releases, and if so, that appropriate corrective or remedial actions have been taken.



Mr. Donald Gibson  
September 20, 1990  
Page 2

If appropriate remedial are not taken this could be considered improper closure of an underground tank and any owner of an underground tank is liable for a civil penalty of not less than five hundred or more than five thousand dollars per day each of violation. You are therefore requested to submit a workplan within 30 days of the date of this letter. Please contact the undersigned at 271-4320 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney, Consumer  
and Environmental Protection Division  
Rafat Shahid, Assistant Agency Director  
Lester Feldman, SFRWQCB  
Howard Hatayama, DOHS

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO634

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

June 11, 1990

Mr. Donald Gibson  
1175 Clarendon  
Oakland, CA 94610

Subject: Unauthorized Release from Removal of an Underground Tank at  
Gibson Paint Co.  
1199 E. 12th St.  
Oakland, CA 94606

Dear Mr. Gibson:

Alameda County Environmental Health, Hazardous Materials Division, has been informed of subsurface soil results in response to underground tank removals at the above site. These results have been given to our agency by Mr. Reinhard Rumpke of R. J. Miller Environmental. Because of the degree of contamination found, this facility is considered to have experienced a confirmed release of petroleum hydrocarbons that has impacted subsurface soil and ground water. The extent of this contamination must be assessed and remediated.

Our office will be the lead agency overseeing both the soil and groundwater remediation of this site. The Regional Water Quality Control Board (RWQCB) is currently unable to oversee the large number of contamination cases within Alameda County and has delegated the handling of this case to our Division. We will be in contact with the RWQCB in order to provide you with guidance concerning the RWQCB's remediation requirements. However, please be aware that you are responsible for diligent actions to protect waters of the State.

To complete contaminant assessment and begin any possible remediation, we require that you submit a work plan which, at a minimum, addresses the items listed below and presents a timetable for their completion. Please submit this workplan within 30 days of the date of this letter.

Gibson Paint Co.  
June 11, 1990  
Page 2

## I. Introduction

- A. Statement of scope of work
- B. Site map showing location of existing and past underground storage tanks and associated piping
- C. Site History
  - provide historical site use and ownership information. Include a description of types and locations of hazardous materials used on site.

## II. Site Description

- A. Vicinity description including hydrogeologic setting
- B. Initial soil contamination and excavation results
  - provide sampling procedures used
  - indicate depth to ground water
  - describe soil strata encountered
  - provide soil sampling results, chain of custody forms, identity of sampler
  - describe methods for storing and disposal of all soils

## III. Plan for determining extent of soil contamination on site

- A. Describe approach to determine extent of lateral and vertical contamination
  - identify subcontractors, if any
  - identify methods or techniques used for analysis
  - provide sampling map showing all lines of excavation and sampling points
  - if a step out procedure is used, define action level for determination of "clean" isopleth
  - provide chain of custody forms, lab analysis results, all receipts and manifests, & identity of sampler
- B. Describe method and criteria for screening clean versus contaminated soil. If onsite soil aeration/bioremediation is to be utilized, then provide a complete description of method that includes:
  - volume and rate of aeration/turning
  - method of containment and cover
  - wet weather contingency plans
  - permits obtained
- C. Describe security measures

Gibson Paint Co.  
June 11, 1990  
Page 3

#### IV. Plan for determining ground water contamination

- Construction and placement of wells should adhere to the requirements of the "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks". Provide a description of placement and rationale for the location of monitoring wells including a map to scale.
- The placement and number of wells must be able to determine the extent and magnitude of the free product and dissolved product plumes.

##### A. Drilling method for construction of monitoring wells

- expected depth and diameter of monitoring wells
- date of expected drilling
- casing type, diameter, screen interval, and pack and slot sizing techniques
- depth and type of seal
- development method and criteria for adequacy of development
- plans for cuttings and development water

##### B. Ground water sampling plan

- method for free product measurement, observation of sheen
- well purging procedures
- sample collection procedures
- chain of custody procedures
- procedures for determining ground water gradient

##### C. Sampling schedule

- measure free product weekly for first month following well installation
- measure free product and dissolved constituents monthly for first three months.
- after first three months monitor quarterly.
- monitoring must occur a minimum of one year.

#### V. Provide a site safety plan

Gibson Paint Co.  
June 11, 1990  
Page 4

## VI Development of a Remediation Plan.

- A. The Remediation Plan is to include a time schedule for remediation, and, at minimum, must address the following issues:
- removal of all free product. Manual bailing is not acceptable as a recovery system. Actual amount of free product removed must be monitored and tabulated.
  - remediation of contaminated soils and dissolved constituents must follow RWQCB's resolution No. 68-16.
  - soils containing 1,000+ ppm of hydrocarbons must be remediated. Soils containing between 100 and 1,000 ppm must be remediated unless sufficient evidence is provided which indicates no adverse effects on groundwater will occur. Clean up of soils to 100 ppm is strongly recommended.
  - design of remedial action system should be based on a review of hydrogeologic and water quality data and on an evaluation of mitigation alternatives. The determination of probable capture zone(s) of extraction system(s) should be based on aquifer characteristics as determined by aquifer test data

## VII Reporting

- A. Technical reports should be submitted with a cover letter from Gibson Paint Co.. The letter must be signed by an authorized representative.
- B. Monthly reports must be submitted for the next three months with the first report due 90 days from the above letter date.
- C. Quarterly reports must be submitted with the first report due 90 days after the final monthly report. These reports should describe the status of the investigation and cleanup.
- D. All reports and proposals must be signed by a California-Certified Engineering Geologist, California Registered Geologist or a California-Registered Civil Engineer (see page 2, 2 June 1988 RWQCB document). A statement of qualifications should be included in

Gibson Paint Co.  
June 11, 1990  
Page 5

all reports. Initial tank removal and soil sampling does not require such expertise; however, borehole and monitoring well installation and logging, and impact assessments do require such a professional.

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and RWQCB. You should be aware that this Division is working in conjunction with the RWQCB and that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of agreed upon time deadlines must be confirmed in writing by either this Division or the RWQCB.

Should you have any questions concerning the contents of this letter or the status of this case please contact Barney Chan, Hazardous Materials Specialist at 271-4320.

Sincerely,



Edgar B. Howell III  
Chief, Hazardous Materials Division

cc: Gil Jensen, Alameda County District Attorney, Consumer &  
Environmental Protection  
Rafat Shahid, Assistant Agency Director  
Lester Feldman, SFRWQCB  
Howard Hatayama, DOHS  
Mr. Reinhard Rumpke, R. J. Miller Environmental Co.

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0634

April 11, 1990  
Mr. Donald Gibson  
1175 Clarendon  
Oakland, CA 94610

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

Re: Removal of Underground Tanks at Gibson Paint Co.

Dear Mr. Gibson:

This memo is to summarize the items discussed on March 21, 1990 at our office. We understand that you have decided to remove the two underground tanks at Gibson Paint Co., 1199 E. 12 th. St., Oakland, CA 94606. Please provide our office within (60) days :

1. A completed closure/modification plan in triplicate.
2. A deposit for \$558 made out to Alameda County for our oversight of the tank removals.

If you have any questions concerning this matter, please contact Barney Chan at this office at 271-4320.

Sincerely,

Edgar B. Howell III  
Acting Chief Hazardous Materials Division

cc: Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Agency  
Lester Feldman, RWQCB  
Rafat Shahid, Asst. Agency Director Ala. Cty. Env. Health  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Director



R0634

Telephone Number: (415)

March 22, 1990  
Mr. Donald Gibson  
1175 Clarendon  
Oakland, CA 94610

Re: Removal of Underground Tanks at Gibson Paint Co.

Dear Mr. Gibson:

This memo is to summarize the items discussed on March 21, 1990 at our office. We understand that you have decided to remove the two underground tanks at Gibson Paint Co., 1199 E. 12 th. St., Oakland, CA 94606. Please provide our office within (60) days :

1. A completed closure/modification plan in triplicate.
2. A deposit for \$558 made out to Alameda County for our oversight of the tank removals.

If you have any questions concerning this matter, please contact Barney Chan at this office at 271-4320.

Sincerely,

Edgar B. Howell III  
Acting Chief Hazardous Materials Division

cc: Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Agency  
Lester Feldman, RWQCB  
Rafat Shahid, Asst. Agency Director Ala. Cty. Env. Health  
Files



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Director



R0634

Telephone Number: (415)

March 5, 1990

Gibson Paint Co.  
Mr. Donald Gibson  
1199 E. 12 th.  
Oakland, CA 94606

**Re: Notice of Legal Obligation**

Dear Mr. Gibson:

Our records indicate there are two underground tanks at your facility.

In accordance with the California Code of Regulations, Title 23, Chapter 3, Subchapter 16 Underground Tank Regulations you must perform one of the following actions:

1. Submit a tank closure plan to this Department as required by Article 7, 2670, or
  2. Apply for a permanent permit as required by Article 10, 2710.
- Notify this Department within 10 days of your intentions and to obtain the necessary instructions and forms.

Please note that section 25299 of the California Health and Safety Code states that any operator or owner of an underground storage tank is liable for a civil penalty of not less than five hundred dollars or more than five thousand dollars per day for failure to obtain a permit, or failure to properly close an underground storage tank, as required by section 25298.

If you have any questions concerning this matter, please contact Barney Chan at this office at 271-4320.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Edgar B. Howell III', with a long horizontal flourish extending to the right.

Edgar B. Howell III  
Acting Chief Hazardous Materials Division

cc: Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Agency  
Lester Feldman, RWQCB  
Rafat Shahid, Asst. Agency Director Ala.Cty. Env. Health  
Files