

J & M INC.
GENERAL ENGINEERING • CONTRACTORS
P.O. BOX 128
HAYWARD, CALIFORNIA 94543
415/782-3434
Contractor's License No. 176709

92 FEB 23 PM 2:29

February 19, 1992

Ms. Pamela J. Evans
Alameda County Health Care Services
Hazardous Materials Program
80 Swan Way, Room 200
Oakland, Ca 94621

Dear Ms. Evans:

Enclosed please find one (1) copy of our groundwater monitoring progress report for the first (1st) quarter of calendar year 1992. The report was prepared by GGS, our environmental consultants.

Please contact me should you need further information.

Sincerely:



Manuel Marques III
President
J & M Inc

92 Feb 23 PM 2:29



GEOENVIRONMENTAL AND **G**EOLOGIC **S**ERVICES

**GROUNDWATER MONITORING
TANK NO. 1 AND 2 EXCAVATION
JANUARY 1992**

**3826 DEPOT ROAD
HAYWARD, CALIFORNIA**

Prepared For

**J & M, Inc.
Post Office Box 128
3826 Depot Road
Hayward, California 94543**

Project Number 390

February 19, 1992

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1. INTRODUCTION

1.1. Purpose and Scope of Work

The purpose of this report is to summarize a groundwater monitoring investigation in response to soil or groundwater contamination found during closure of underground storage tanks ("UST") by excavation and removal at 3826 Depot Road, Hayward, California ("Site"). The work included the purging and sampling of three (3) groundwater monitor wells, MW-1, MW-2, and MW-3 surrounding a previous excavation for Tank No. 1 and No. 2 at the Site. This groundwater monitoring progress report is submitted at the request of the Alameda Health Care Services Agency ("ACHCSA"), Oakland, California. ACHCSA letters are included in Appendix B - "Agency Letters of Required Action" for reference. GEOENVIRONMENTAL AND GEOLOGIC SERVICES was authorized by Agreement with J & M, Inc. to begin work on September 16, 1991.

1.2. Location

The property is located at 3826 Depot Road, Hayward, California 94543 (see Figure 1 - "Vicinity Map" and Figure 2 - "Site Plan Map"). The Site is adjacent to a pallet storage business (to the southwest), St. Francis Electric vehicle storage yard (to the east), and an apparent wrecking junk yard (to the west). A State of California Water Resources Control Board Underground Storage Tank Program Facility/Site Information and/or Permit Application was signed by the landowner on August 16, 1990. A State of California Water Resources Control Board Underground Storage Tank Program Tank Permit Application Information was signed by the landowner on August 16, 1990 for each existing and removed tank on the Site.

The Site is located approximately 1.1-miles east of the nominal tideline of the San Francisco Bay and approximately 1.25-miles south of the Hayward Airport, Hayward, California. Businesses within the vicinity are a mixture of older industrial-type currently being renovated or demolished and replaced with commercial offices .

The hydrogeologic setting for the Site is described in a Work Plan dated March 26, 1991 submitted to ACHCSA by Terrasearch, Inc. as:

"The Site is located in the San Francisco plain, a northwest-southeast trending structural depression, bordered on the east by the Hayward fault and the Diablo Range, and bordered on the west by San Francisco Bay. The Site is slightly above sea level and 1.1-miles from the nominal tideline of the San Francisco Bay. The area is underlain by late Quaternary alluvial deposits that are generally comprised of clays, silts, sands and gravels. The alluvial deposits are laterally continuous, poorly permeable, and generally prevent significant quantities of surface

water and precipitation from percolating into deeper water bearing strata. In this area [near the Site], these alluvial deposits are generally underlain by fine sands, silts and gravels of the Santa Clara Formation. Regional ground-water flow is generally west-southwest toward the Bay. The area is principally drained by two streams, San Lorenzo Creek to the north of the Site and Alameda Creek, both which discharge directly into San Francisco Bay.

The area is generally underlain by unconsolidated alluvial fan deposits of Pliocene-Pleistocene age near a discrete alluvial fan deposit known as the San Lorenzo Cone. The deposits were laid down by the ancestral San Lorenzo Creek as it emerged from the foothills of the Diablo Range. Westward sloping sand and gravel beds were deposited by the braided creek, and during times of flood, finer grain layers of silt and clay were deposited. The total thickness of the unconsolidated deposits reportedly is in excess of 1,000 feet.

Apparently the depth of vicinity water supplies range from 32 to 581 feet and the depth to ground-water ranges from 16 to 90 feet. Local municipality water is imported from Hetch Hetchy Reservoir in the Sierra Nevada. Ground-water has not been apparently actively used by the City of Hayward for drinking water for approximately 30 years.

Aquifers in the San Lorenzo Cone are compromised of well sorted, permeable gravel and sand beds deposited by the San Lorenzo Creek. The aquifers are generally confined by the interbedded, finer grain silt and clay deposits. The deposits in San Lorenzo Cone can be divided into five distinct zones: 1) shallow relatively permeable deposits within 500 feet of the land surface; 2) aquifers between depths of about 50 to 100 feet, known collectively as the Newark Aquifer; 3) aquifers between depths of about 130 and 220 feet, known collectively as the Centerville Aquifer; 4) aquifers between depths of 250 and 400 feet, known collectively as the Fremont Aquifer; and 5) aquifers deeper than 400 feet.

The shallow relatively permeable zone within the San Lorenzo Cone generally is composed of silty sand, is of limited aerial extent and often occurs under unconfined, perched conditions. Recharge to the shallow zone occurs by infiltration of direct precipitation and streamflow. Ground-water in the shallow relatively permeable zone generally flows towards San Francisco Bay.

The Newark aquifer is semi-confined by a 25 to 60 foot thick clay layer and generally consists of interfingering sand and gravel lenses separated by clay layers approximately 5 to 10 feet thick. Infiltrations of streamflow at the apex of the San Lorenzo Cone and leakage through the upper clay confining layer allow recharge of this aquifer. Ground water in the Newark Aquifer generally flows towards San Francisco Bay.

The Centerville and Fremont Aquifers are both confined by thick clay layers that extend westward beneath San Francisco Bay. The Aquifers consist of discrete sand and gravel lenses ranging from 5 to 60 feet in thickness. Recharge to these aquifers likely occurs by lateral ground water flow and leakage. The direction of ground water flow in both aquifers has not been documented.

The deeper aquifers are generally composed of sand, gravel and cobbles deposited by Alameda Creek to the south. They are believed to be recharged by subsurface inflow from the south and leakage from the Fremont Aquifer. The direction of ground water flow in the deeper aquifers has not been documented."

1.3. Site Contacts

The following can be contacted for further information regarding this report:

Name: Manuel Marques III
 Company: J & M, Inc.
 Address: Post Office Box 128
 3826 Depot Road, Hayward, California 94543
 Telephone: (510) 782-3434

Consultant: Geoenvironmental and Geologic Services
 Richard C. Kent, California Registered Geologist No. 4321
 Post Office Box 30664, Walnut Creek, California 94598-0664
 (510) 934-5902

2. PREVIOUS WORK

Four (4) soil and one (1) groundwater samples were collected on August 20, 1990 from the previous location of Tank No. 1 (diesel) and No. 2 (diesel) per the ACHCSA Notice of Violation to J & M, Inc. dated July 25, 1990. The samples were analyzed for total petroleum hydrocarbons as diesel ("TPHd") and benzene, toluene, total xylenes and ethylbenzene ("BTXE"). Detectable levels of diesel and gasoline constituents were found in the soil and water samples as shown below in Table 1 - "August 20, 1990 Sampling Results". The water sample was collected as a surface sample from the re-excavated tank location, at approximately six (6)-feet depth below grade.

**TABLE 1 - AUGUST 2, 1990 SAMPLING RESULTS
(Tank No. 1 and 2 Re-Excavation)**

Sample	TPHd	Benzene	Toluene	Xylenes	Ethylbenzene
Water Sample # 1	8,100 mg/l	4.7 mg/l	9.1 mg/l	22 mg/l	6.0 mg/l
Soil Sample # 2	<3,000 mg/kg	<50 mg/kg	<50 mg/kg	<200 mg/kg	<50 mg/kg
Soil Sample # 3	<3,000 mg/kg	<50 mg/kg	<50 mg/kg	<200 mg/kg	<50 mg/kg
Soil Sample # 4	110,000 mg/kg	<700 mg/kg	6,200 mg/kg	<4,700 mg/kg	<1,300 mg/kg
Soil Sample # 5	<3,000 mg/kg	<50 mg/kg	<50 mg/kg	<200 mg/kg	<50 mg/kg

Groundwater monitor wells MW-1, MW-2 and MW-3 were installed on April 19, 1991 and developed and sampled on April 22-23, 1991. The water samples were submitted for analysis of TPHd and BTXE. The results of sampling are not available (verbal communication, J & M, Inc.).

3. STATUS OF MONITORING PROGRAM

3.1. Agency Letters of Required Actions

Agency letters of required actions are included in Appendix B for reference.

3.2. Actions

Monitor wells MW-1, MW-2 and MW-3 were last sampled in April 1991. The wells are planned to be sampled next in April 1992. There is no groundwater remediation ongoing or planned.

4. SAMPLING METHODS AND PROCEDURES

4.1. Well Locations

Groundwater monitor wells MW-2 and MW-3 were located in an assumed downgradient direction. Well MW-1 was installed in the assumed upgradient [background] direction to the previous excavation of UST No.'s 1 and 2. As-built well logs are not available at this time, however, the wells were generally designed to a total depth of approximately fifteen (15)-feet with screened intervals from five (5)- to ten (10)-feet depth. The well casings are constructed of four (4)-inch PVC pipe with lockable, water tight caps. Each well is protected by surface traffic boxes.

Each monitor well was designed to collect water samples from the first encounter of water beneath the Site, at approximate depths of near six (6)- to eight (8)-feet. Possible fluctuations in the groundwater table due to tidal influence from the San Francisco Bay are assumed and could cause the groundwater table to rise and fall around the first encounter depth.

4.2. Groundwater Sampling

Prior to sampling, each well was checked for free product and anomalous odors. The wells were sampled beginning at the well with the least suspected contamination (Well MW-1). Each well was purged of stagnant water in the casing and filter by setting a submersible pump within one (1)-foot of total well depth. A Grundfos Redi-Flo2, 1.8-inch diameter pump was used for purging. Samples were collected following purging of the well when pH, conductivity and temperature stabilized. The instrument used for measuring well parameters was triple rinsed to prevent cross-contamination. The sample was collected

after approximately three well volumes were purged and each well was allowed to recover to at least 80% of the water level recorded prior to purging.

Water samples were collected with disposable or dedicated bailers with a nozzle attached to the bottom of the bailer that did not allow air contact in order to minimize the loss of volatiles from the bailer to the sample container.

Groundwater samples for analysis of gasoline constituents (BTXE) were collected in 40-ml amber glass volatile organic analysis ("VOA") vials. Each vial was closed by a plastic screw cap with a Teflon-faced septum that was used to seal the sample without headspace. Water samples for TPHd (diesel) analyses were collected in one (1)-liter amber glass bottles.

All sample containers were new (except VOA's containing a preservative prepared by the laboratory). Duplicate samples were collected. Sample containers were labeled with self-adhesive labels containing the project number and name, date and time of collection, and location. Sample vials and bottles were filled to overflow to remove entrapped air, and then inverted and tapped to test for air bubbles.

All samples were accompanied from the field to laboratory by Chain-Of-Custody and request for analysis number 390920103A that was signed and dated at the time of transferring possession of the samples by each person authorized to turn over and receive the samples (see Appendix A - "Laboratory Report").

The following is a summary of water sample field logs.

TABLE 2 - SUMMARY OF WATER SAMPLE FIELD LOGS
 (samples collected on January 3, 1992)

Sample No.	Well No.	Well Depth (feet)	Initial SWL (feet)	SWL when Sampled	Gallons Purged	Pump Rate (gpm)	Sample Odor	Sample Color	Sample Turbidity
MW-1 /0192	MW-1	15.1	5.63	6.01	55	0.93	none	clear	clear
MW-2 /0192	MW-2	15.0	5.34	5.7	55	1.76	none	clear	clear
MW-3 /0192	MW-3	14.8	5.69	5.45	55	2.2	none	clear	clear

4.2.1. Disposal of Material

Purged water was pumped directly into 55-gallon barrels and temporarily stored on-Site for disposal, if necessary, by client. Non-disposable sampling equipment was triple-rinsed cleaned with Alconox detergent solution and air dried. Waste cleaning water was placed in the 55-gallon barrels. Each barrel is labeled with information including date

filled, source, matrix type, known or suspected contaminant, barrel owner, owner contact name and telephone number.

5. ANALYTICAL RESULTS

5.1. Laboratory Methods

All water samples were analyzed for total petroleum hydrocarbons ("TPH") as diesel ("TPHd"), benzene, toluene, total xylenes, and ethyl benzene ("BTXE"). Analytical procedures followed those outlined in "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks, Tri-Regional Recommendations" by the North Coast, San Francisco Bay, and Central Valley California Regional Water Quality Control Boards as supported by the "Leaking Underground Fuel Tank (LUFT) Field Manual" by the State Water Resources Control Board.

The water samples for diesel analysis were prepared using EPA Method 3510 - Separatory Funnel Extraction. The sample was analyzed using DHS method by GC-PID (gas chromatograph with a photoionization detector) [equivalent EPA Method 8015]. The chromatograph of the sample was compared to a type chromatograph for diesel as part of the laboratory quality control and assurance. The required practical detection limit was 50 ppb.

The water samples for BTXE analysis were prepared using EPA Method 5030 - Purge and Trap. The sample was analyzed using a GC-FID (gas chromatograph with a flame ionization detector) according to EPA Method 8020 - Aromatic Volatile Organics using a Gas Chromatograph/Mass Spectrometer. The required practical detection limit was 0.3 ppb.

5.2. Laboratory Results

The following is a summary table for analyses reported by Sequoia Analytical laboratory, Concord, California, Department of Health Services Certification No. 1271 (see Appendix A).

TABLE 3 - SUMMARY OF GROUNDWATER ANALYSIS

TPHd?
all concentrations in micrograms per liter [parts per billion, ppb]

Sample Number	TPHd	B	T	X	E
MW-1/0192	ND	ND	ND	ND	ND
MW-2/0192	57	ND	ND	ND	ND
MW-3/0192	ND	ND	ND	ND	ND

Table Notes:

TPHd - total petroleum hydrocarbons as DIESEL ("high boiling point total petroleum fuel hydrocarbons)
B - benzene; T - toluene; X - total xylenes; E - ethyl-benzene; ND - not detected

5.3. Interpretation of Data

5.3.1. Extent of Contamination

Minor groundwater contamination by diesel was detected in a sample collected from Monitor Well MW-2 on January 3, 1992. The extent of contamination is not mappable. BTEX was not detected in wells MW-1, MW-2 or MW-3. Diesel was not detected in wells MW-1 or MW-3. Previous sampling in April 1991 did not detect diesel or BTEX in any of the wells.

6. CONCLUSIONS

It is concluded that groundwater Monitor Well MW-2 contains detectable diesel in the apparent downgradient direction from the previous excavation for underground storage tanks No. 1 and No. 2. Both tanks previously held diesel fuel.

The level of contamination at this time is not significant, in our opinion. There is no groundwater remediation ongoing or planned.

7. RECOMMENDATIONS FOR NEXT ACTION

7.1. Frequency of Sample Collection

It is proposed to collect groundwater samples from monitor wells MW-1, MW-2, and MW-3 during April and July, 1992. The purpose of this quarterly sampling program would be to document contamination, if any, since April 1991 in the area surrounding the previous excavation of Tank No.'s 1 and 2 (diesel).

7.2. Analysis to be Performed

do TPH also

Ground water samples would be analyzed for total petroleum hydrocarbons ("TPH") as diesel ("TPHd"), benzene, toluene, total xylenes, and ethyl benzene ("BTXE"). Analytical procedures will follow those outlined in "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks, Tri-Regional Recommendations" by the North Coast, San Francisco Bay, and Central Valley California Regional Water Quality Control Boards as supported by the "Leaking Underground Fuel Tank ('LUFT') Field Manual" by the State Water Resources Control Board.

8. LIMITATIONS

This report is restricted to an environmental investigation involving the closure of underground storage tanks previously containing known or suspected products that have been identified either by the property owner(s), historical records, or previous investigations. This report specifically excludes an environmental assessment for radon or other radioactive materials, as well as, asbestos.

GG'S services were performed in accordance with generally accepted professional practices, in the same or similar localities, related to the nature of the work accomplished, at the time services were rendered. Findings apply only to present conditions, and opinions expressed are subject to revision when additional or new information is submitted in writing by Client. GGS's services shall not be subject to any express or implied warranties whatsoever.

Hazardous materials not discovered through appropriate and mutually agreed-upon sampling techniques does not guarantee that hazardous materials do not exist at the Site. Similarly, a Site which in fact is unaffected by hazardous materials at the time of GGS's exploration, may later, due to natural causes or human intervention, become contaminated. GGS is not liable for failing to discover hazardous materials whose exact location is not possible to foretell from the surface, or for failing to discover hazardous materials which in fact did not exist at specific sampling locations at the time such samples were obtained.

In the preparation of this report, GGS may have reviewed and interpreted certain information provided by third parties, including government authorities, testing laboratories, or other third parties. GGS did not conduct an independent evaluation of the accuracy or completeness of such information, and is not responsible for any errors or omissions contained in such information.

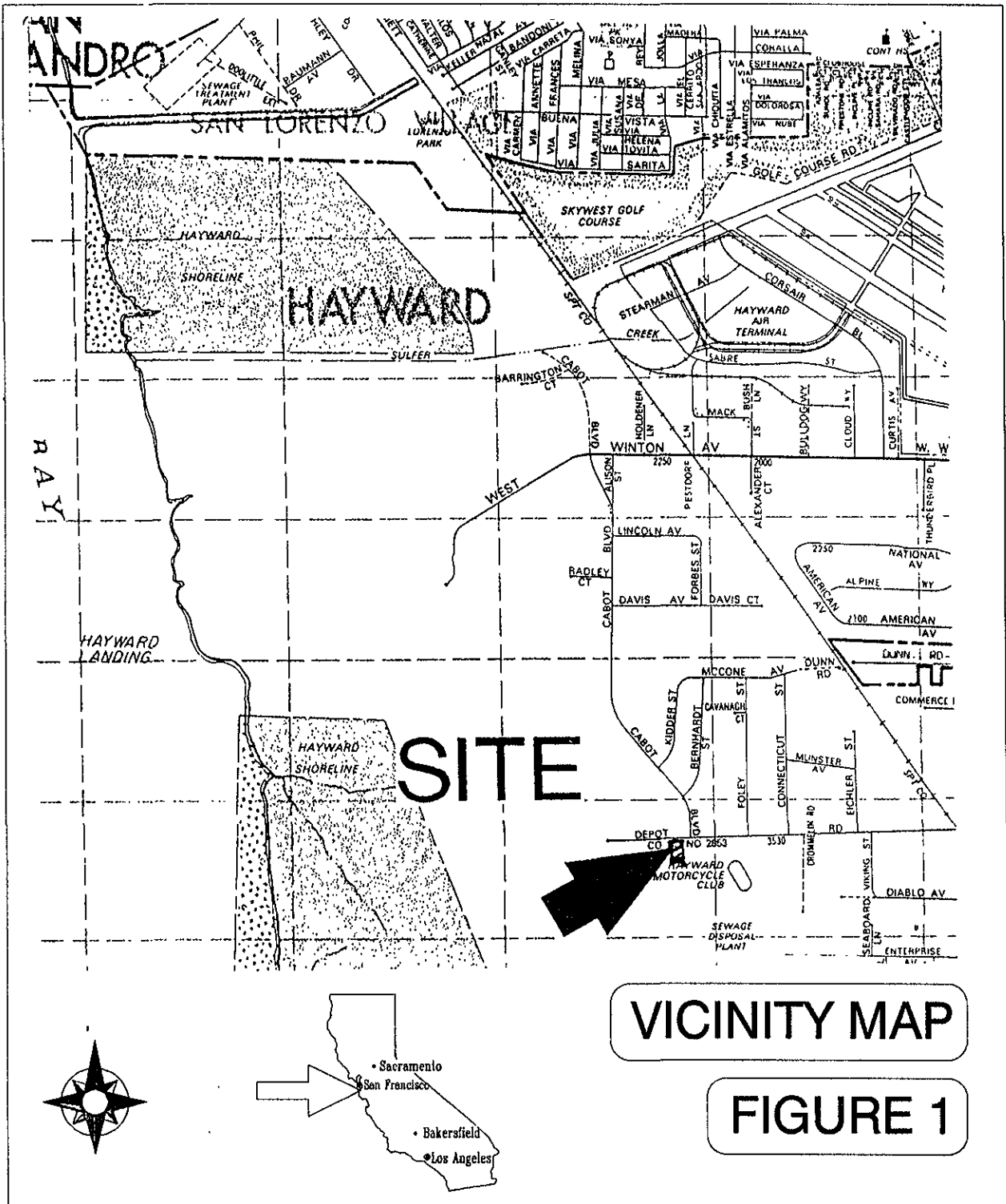
This report should not be construed as presenting a value to the Site nor the

condition as to construction capabilities. In the event of changes in future development plans as we understand them at the time of this report, the conclusions and recommendations made herein shall be invalid until we have been given the opportunity to review and modify this report in writing. Final approval of environmental investigations and remediation is authorized only by appropriate governmental agencies.

Respectfully submitted,
GEOENVIRONMENTAL AND GEOLOGIC SERVICES



Richard C. Kent
California Registered Geologist No. 4231



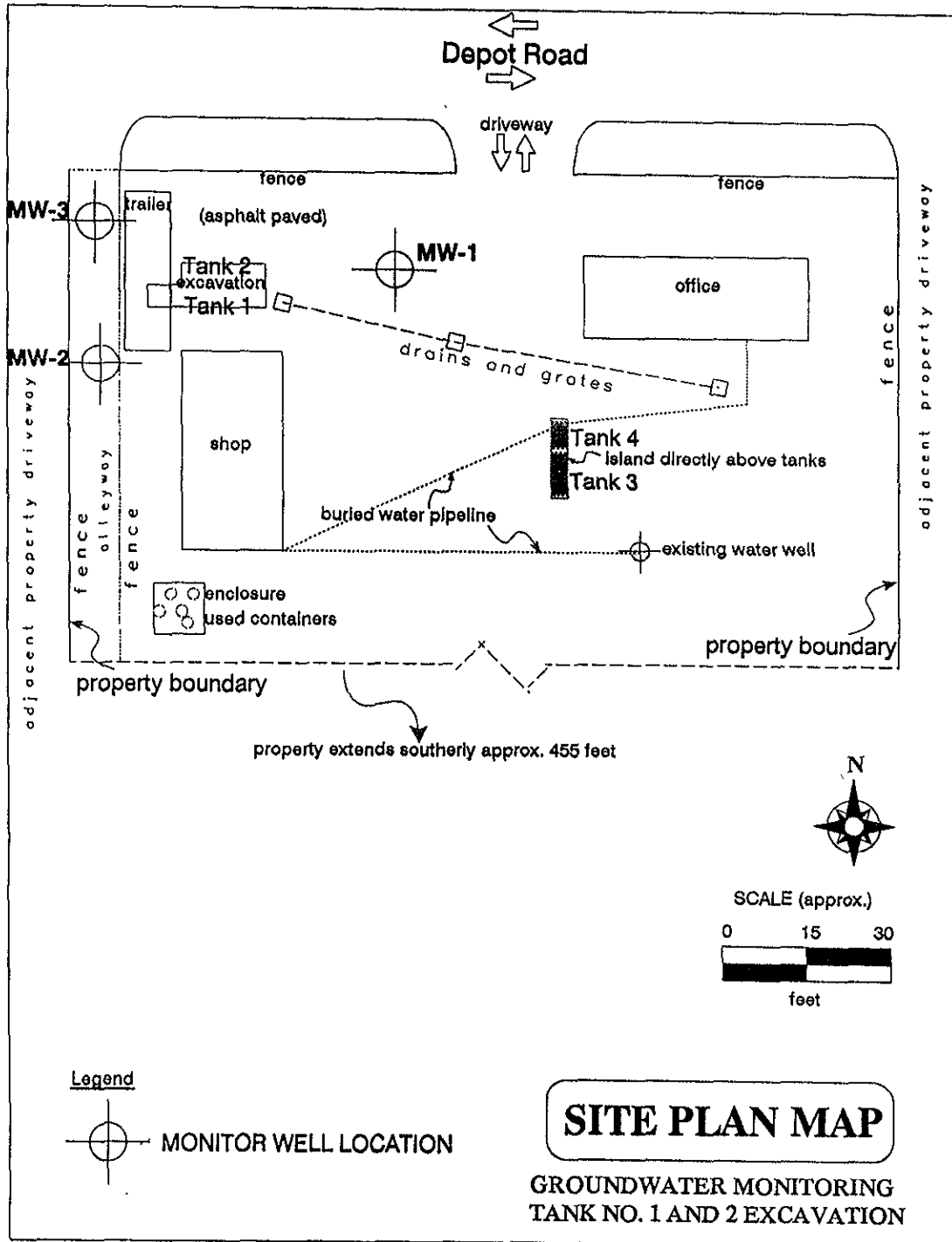


FIGURE 2

APPENDIX A

LABORATORY REPORT



SEQUOIA ANALYTICAL

1900 Bates Avenue • Suite LM • Concord, California 94520
(510) 686-9600 • FAX (510) 686-9689

G G S
P.O. Box 30664
Walnut Creek, CA 94598
Attention: R. Kent

Client Project ID: #390/J & M, Inc.
Matrix Descript: Water
Analysis Method: EPA 5030/8020
First Sample #: 201-0094

Sampled: Jan 3, 1992
Received: Jan 6, 1992
Analyzed: Jan 6, 1992
Reported: Jan 23, 1992

BTEX DISTINCTION (EPA 8020)

Sample Number	Sample Description	Benzene ug/L (ppb)	Toluene ug/L (ppb)	Ethyl Benzene ug/L (ppb)	Xylenes ug/L (ppb)
201-0094	MW-1/0192	N.D.	N.D.	N.D.	N.D.
201-0095	MW-2/0192	N.D.	N.D.	N.D.	N.D.
201-0096	MW-3/0192	N.D.	N.D.	N.D.	N.D.

Detection Limits:	0.30	0.30	0.30	0.30
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Analytes reported as N.D. were not present above the stated limit of detection.

SEQUOIA ANALYTICAL

Scott A. Chieffo
Scott A. Chieffo
Project Manager



SEQUOIA ANALYTICAL

1900 Bates Avenue • Suite LM • Concord, California 94520
(510) 686-9600 • FAX (510) 686-9689

G G S	Client Project ID: #390/ J & M, Inc.	Sampled: Jan 3, 1992
P.O. Box 30664	Matrix Descript: Water	Received: Jan 6, 1992
Walnut Creek, CA 94598	Analysis Method: EPA 3510/8015	Extracted: Jan 10, 1992
Attention: R. Kent	First Sample #: 201-0094	Analyzed: Jan 22, 1992
		Reported: Jan 23, 1992

TOTAL PETROLEUM FUEL HYDROCARBONS (EPA 8015)

Sample Number	Sample Description	High B.P. Hydrocarbons $\mu\text{g/L}$ (ppb)
201-0094	MW-1/0192	N.D.
201-0095	MW-2/0192	57
201-0096	MW-3/0192	N.D.

Detection Limits:

50

High Boiling Point Hydrocarbons are quantitated against a diesel fuel standard.
Analytes reported as N.D. were not present above the stated limit of detection.

SEQUOIA ANALYTICAL

Scott Chieffo
Scott A. Chieffo
Project Manager



SEQUOIA ANALYTICAL

1900 Bates Avenue • Suite LM • Concord, California 94520
(510) 686-9600 • FAX (510) 686-9689

G G S	Client Project ID: #390/ J & M, Inc.
P.O. Box 30664	
Walnut Creek, CA 94598	
Attention: R. Kent	QC Sample Group: 2010094-96
	Reported: Jan 23, 1992

QUALITY CONTROL DATA REPORT

ANALYTE	Benzene	Toluene	Ethyl-Benzene	Xylenes	Diesel
Method:	EPA 8015/8020	EPA 8015/8020	EPA 8015/8020	EPA 8015/8020	EPA8015
Analyst:	K.N.	K.N.	K.N.	K.N.	A. Tuzon
Reporting Units:	ug/L	ug/L	ug/L	ug/L	ug/L
Date Analyzed:	Jan 6, 1992	Jan 6, 1992	Jan 6, 1992	Jan 6, 1992	Jan 17, 1992
QC Sample #:	Matrix Blank	Matrix Blank	Matrix Blank	Matrix Blank	Matrix Blank
Sample Conc.:	N.D.	N.D.	N.D.	N.D.	N.D.
Spike Conc. Added:	20	20	20	60	300
Conc. Matrix Spike:	17	16	16	53	290
Matrix Spike % Recovery:	85	80	80	88	96
Conc. Matrix Spike Dup.:	17	16	16	55	370
Matrix Spike Duplicate % Recovery:	85	80	80	92	123
Relative % Difference:	0.0	0.0	0.0	3.7	25

SEQUOIA ANALYTICAL

Scott A. Chieffo
 Scott A. Chieffo
 Project Manager

% Recovery:	$\frac{\text{Conc. of M.S.} - \text{Conc. of Sample}}{\text{Spike Conc. Added}} \times 100$
Relative % Difference:	$\frac{\text{Conc. of M.S.} - \text{Conc. of M.S.D.}}{(\text{Conc. of M.S.} + \text{Conc. of M.S.D.}) / 2} \times 100$

Manuel Marques, Jr.
J & M, Inc.
July 29, 1991
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groundwater gradient map must be developed for the site. A technical report must be submitted within three months of the time that the first sampling results are available. This report must present and interpret the information generated during the initial subsurface investigation. All reports and proposals for further investigative work must be signed by a qualified person as described in RWQCB guidelines.

All work must be performed according to the guidelines found in the **Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks and the Leaking Underground Fuel Tank Manual**. Copies of these documents can be obtained from the RWQCB office in Oakland. All proposals, reports, and analytical results pertaining to this investigation and site remediation must be sent to this office and to:

Richard Hiett
RWQCB
2101 Webster St., 4th Floor
Oakland CA 94612

Supply quarterly reports that describe the status of the investigation and work performed during the reporting period. These reports must also interpret sampling data and should include recommendations or plans for further investigation and/or remediation.

This is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Be aware that Section 13268 (a) of the State Water Code states that failure to furnish reports as required by section 13267 (b) is a misdemeanor and provides for civil penalties.

2. No analytical results from the soil surface sampling carried out in April, 1991 have been received by this office. Provide sampling results by August 10, 1991. Also provide a written description of any actions you have taken to remediate or dispose of contaminated soil.
3. **Section 25298 of the Health and Safety Code of California** requires that unused underground fuel storage tanks be monitored or removed. **Section 2670 of the California Code of Regulations** requires that a closure plan be submitted to this office.

You have been instructed by this office to monitor remaining fuel tanks for possible leaks. You stated in your letter of April 22, 1991 that you intended to remove the two remaining fuel tanks, and would not arrange for a tank tightness test as required. On April 24, 1991, I spoke with Leo Neu by telephone and told him that this office would

APPENDIX B AGENCY LETTERS OF REQUIRED ACTION

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

July 29, 1991

Manuel Marques, Jr.
J & M, Inc.
P.O. Box 128
Hayward CA 94543

NOTICE OF VIOLATION

RE: Soil and Groundwater Investigation and Underground Fuel Tank
Requirements for 3826 Depot Rd., Hayward CA 94545

Dear Mr. Marques:

Three months have passed since I last heard from you regarding your investigation of soil and groundwater contamination. Below are listed unresolved compliance issues pertaining to the contamination and to the operation of underground tanks at your site:

1. California Health and Safety Code Section 25298 (c) and California Code of Regulations Section 2672 (d) require that you demonstrate to this agency that any releases from your underground tank have been investigated and that corrective or remedial action has been taken. You are required to investigate, in a timely manner, the full lateral and vertical extent of petroleum contamination affecting soil and groundwater at and beyond your site.

Your workplan of March 1991 outlined a proposal for installing groundwater monitoring wells. No timetable for well installation and development was given nor was a monitoring frequency or duration specified. Monitoring wells must be installed and the first round of sampling completed by August 31, 1991. You must sample monitoring wells monthly for a minimum of three months. After three months of monthly sampling, a change to a quarterly monitoring frequency may be considered. Wells must be monitored for a minimum of one year. Sampling results must be provided to this office within 30 days of the date the wells are sampled.

At a minimum, you must monitor and chemically analyze for Total Petroleum Hydrocarbons as diesel (TPH d) and for BTEX (benzene, toluene, ethyl benzene, and xylene) components. Should investigation of the remaining tanks at your site indicate that gasoline leaks have occurred, analysis for TPH as gasoline will also be required. A

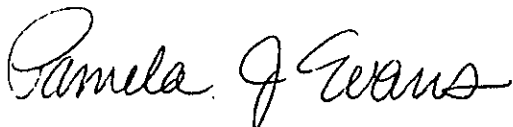
Manuel Marquez, Jr.
J & M, Inc.
July 29, 1991
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require a written timetable for tank removal activities. To date, you have not submitted a closure plan or a timetable to this office. The underground tank law requires that tanks be monitored or removed. If you intend to remove the tanks, you must submit a closure plan by August 10, 1991. If the closure plan is not submitted by this date, a written monitoring plan that meets the requirements of Section 2641 (a), Title 23 of the California Code of Regulations must be submitted by August 10, 1991. In either case, you must submit a written summary of your past tank monitoring procedures by August 10, 1991.

The Health and Safety Code of California, Section 25299(a) and (b) provides for penalties of not less than \$500 per day for failure to monitor or to properly close an underground storage tank.

Enclosed you will find a copy of Alameda County's tank closure form. You may contact me with any questions at 271-4320.

Sincerely,



Pamela J. Evans
Hazardous Materials Specialist

Enclosure

c: Gil Jensen, Alameda County District Attorney's Office
Richard Hiett, Regional Water Quality Control Board
Richard Kent, Terra Search, Inc.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

September 18, 1991

Manuel Marques, Jr.
J & M, Inc.
P.O. Box 128
Hayward CA 94543

SECOND NOTICE OF VIOLATION

RE: Soil and Groundwater Investigation and Underground Fuel Tank
Requirements for 3826 Depot Rd., Hayward CA 94545

Dear Mr. Marques:

Below are listed unresolved compliance issues pertaining to the
contamination and to the operation of underground tanks at your site:

1. California Health and Safety Code Section 25298 (c) and California Code of Regulations Section 2672 (d) require that you demonstrate to this agency that any releases from your underground tank have been investigated and that corrective or remedial action has been taken. You are required to investigate, in a timely manner, the full lateral and vertical extent of petroleum contamination affecting soil and groundwater at and beyond your site.

Your workplan of March 1991 outlined a proposal for installing groundwater monitoring wells. No timetable for well installation and development was given nor was a monitoring frequency or duration specified. Correspondence from this office dated July 29, 1991 required that monitoring wells must be installed and the first round of sampling completed by August 31, 1991. The Notice specified a monitoring and sampling schedule, and outlined the type of hydrogeological data and technical reports that must be submitted.

This is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Be aware that Section 13268 (a) of the State Water Code states that failure to furnish reports as required by section 13267 (b) is a misdemeanor and provides for civil penalties.

No analytical results from the soil surface sampling carried out in April, 1991 have been received by this office. You were instructed to

provide sampling results and any remedial action you have taken to this office by August 10, 1991.

2. Section 25298 of the Health and Safety Code of California requires that unused underground fuel storage tanks be monitored or removed. Section 2670 of the California Code of Regulations requires that a closure plan be submitted to this office. You were instructed to submit either a closure plan or a written monitoring plan that meets the requirements of Section 2641 (a), Title 23 of the California Code of Regulations by August 10, 1991. To date neither of these documents has been received by this office.

Corrective Action:

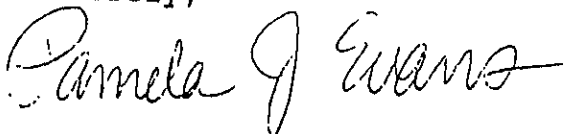
You must take the following steps toward compliance with the above noted requirements by October 1, 1991:

1. Submit required groundwater monitoring well data and reports.
2. Supply soil surface analysis results.
3. Submit either a tank closure plan or a written monitoring plan for the underground fuel tanks.

The Health and Safety Code of California, Section 25299(a) and (b) provides for penalties of not less than \$500 per day for failure to monitor or to properly close an underground storage tank.

You may contact me with any question at 271-4320.

Sincerely,



Pamela J. Evans
Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney's Office
Eddy So, Regional Water Quality Control Board