

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R010231

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

July 19, 1993  
STID 1090

Goodyear Tire & Rubber Co.  
ATTN: James P. O'Neil  
1000 N. Kraemer Pl.  
Anaheim, CA 92806

Re: 2025 Telegraph Ave., Oakland, CA 94612

Dear James P. O'Neil:

This office has reviewed the Site Assessment Report dated June 17, 1993 for the above referenced site submitted by RSI - Remediation Service, Int'l. This office has several comments concerning this report as follows:

1. The samples of water and soil were reported to be all clean and yet there was 1.7 ppm of Oil & Grease found in the water sample of MW-2. This is not insignificant.
2. TPHd and Oil & Grease were found in the original samples during the tank removal. TPHg and TPHd were not sampled in this report. Both of these must be sampled in the next quarterly monitoring event, which is due to be done during August.
3. Although the soil and water that was dumped at 4035 Park Blvd. was reported as clean, samples taken had elevated levels of TPHd and O & G. The soil had not been characterized for all these constituents at your site which may answer why these contaminants were found later. All of these contaminants must be analyzed for in the next quarterly report.

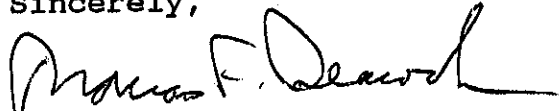
Please also submit information concerning any further activity with regard to the drums of soil and water that were transported and dumped at the Park Blvd. site.

The Regional Water Quality Control Board normally requires at least 4 consecutive quarters of groundwater monitoring before considering site closure. Attached is a list of information that should be included before site closure is requested.

2025 Telegraph Ave.  
STID 1090  
July 19, 1993  
Page 2 of 2

If you have any questions please call this office at (510) 271-4530.

Sincerely,



Thomas F. Peacock, Supervising HMS  
Hazardous Material Division

cc: Edgar B. Howell, Chief - files  
Gil Jensen, Alameda County District Attorney's Office  
Nancy Bush, Stephens Partnership No. 14, 550 Montgomery  
St., 10th Floor, San Francisco, CA 94111

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



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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 4, 1993  
STID 1090

Goodyear Tire & Rubber Co.  
ATTN: James P. O'Neil  
1000 N. Kraemer Pl.  
Anaheim, CA 92806

Re: 2025 Telegraph Ave., Oakland, CA 94612

Dear James P. O'Neil:

This office has reviewed the Preliminary Site Assessment Workplan dated April 21, 1993 for the above referenced site submitted by RSI - Remediation Service, Int'l. The workplan is accepted as long as the time schedule is adhered to.

If you have any questions please call this office at (510) 271-4530.

Sincerely,

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

Thomas F. Peacock, Supervising HMS  
Hazardous Material Division

cc: Rich Hiett, RWQCB  
Edgar B. Howell, Chief - files  
Gil Jensen, Alameda County District Attorney's Office  
Nancy Bush, Stephens Partnership No. 14, 550 Montgomery  
St., 10th Floor, San Francisco, CA 94111

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R01023

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

February 23, 1993  
STID 1090

Goodyear Tire & Rubber Co.  
ATTN: Rick Huseman  
1800 Merced St.  
San Leandro, CA 94577

Re: 2025 Telegraph Ave., Oakland, CA 94612

**SECOND NOTICE**

Dear Rick Huseman:

This office has reviewed reports of the underground storage tank removal performed by Semco at the above referenced site on March 18, 1992 and subsequent soil analysis. The following comments are to be considered:

1. You were requested to begin a soil and groundwater investigation in a letter from this office dated September 8, 1992. No investigation has begun.
2. You were requested to file an UST Unauthorized Release (Leak) Report, as required. No report has been filed. A copy of the report is attached.
3. It is clear that the elevated total petroleum hydrocarbon concentrations in soil (2,700 ppm TOG, 520 ppm TPHd, 160 ppm TPHg) at the above site require a soil and groundwater investigation.

I have enclosed the document, Workplan for Initial Subsurface Investigation, a guidance document published by the Regional Water Quality Control Board (RWQCB). Please be advised this office is working in conjunction with the RWQCB to oversee the remediation of hydrocarbon contaminated sites such as these. The RWQCB is the agency entrusted to protect the waters of the state.

Please submit a workplan as described in the above document to this office within thirty (30) days of this letter.


You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). All workplans, analytical results or reports should be sent to our office and to that of the RWQCB to the attention of Mr. Rich

2025 Telegraph Ave., Oakland, 94612  
STID 1090  
February 23, 1993  
Page 2 of 2

Hiatt. Their address is 2101 Webster St., Fourth Floor, Oakland CA 94612. **Be aware that failure to submit the requested documents may subject you civil liabilities.**

If you have any questions please call this office at (510) 271-4530.

Sincerely,



Thomas F. Peacock, Supervising HMS  
Hazardous Material Division

cc: Rich Hiatt, RWQCB  
Edgar B. Howell, Chief - files  
Gil Jensen, Alameda County District Attorney's Office  
Nancy Bush, Stephens Partnership No. 14, 550 Montgomery  
St., 10th Floor, San Francisco, CA 94111  
enclosures

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R01023

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

February 3, 1994  
STID 1090

Goodyear Tire & Rubber Co.  
ATTN: James P. O'Neil  
1000 N. Kraemer Pl.  
Anaheim, CA 92806

Re: 2025 Telegraph Ave., Oakland, CA 94612

Dear James P. O'Neil:

This office has reviewed the Groundwater Monitoring Report dated December 13, 1993 for the above referenced site submitted by RSI - Remediation Service, Int'l and two letters from you. This office has several comments concerning this report as follows:

1. You mention that there is no downgradient well although there are three wells. Either of the two cross could be considered downgradient.
2. You request only using MW2, the only well with contamination, but it is actually the upgradient well.
3. In your next sampling episode you should check water level and compute gradient on all three wells. You can sample only MW2 and whichever of the other two is most downgradient based on those measurements.

If you have any questions please call this office at (510) 271-4530.

Sincerely,

Thomas F. Peacock, Supervising HMS  
Hazardous Material Division

cc: Edgar B. Howell, Chief - files  
Nancy Bush, Stephens Partnership No. 14, 550 Montgomery  
St., 10th Floor, San Francisco, CA 94111  
Noel Plutchak, RSI, 2060 Knoll Dr., Suite 200, Ventura,  
CA 93003

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R01023

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

September 8, 1992

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

Ms. Nancy Bush  
Stephens Partnership No. 14  
550 Montgomery Street, 10th Floor  
San Francisco, CA 94111

Mr. Rick Huseman  
Goodyear Tire and Rubber Company  
1800 Merced Street  
San Leandro, CA 94577

RE: 2025 TELEGRAPH AVENUE, OAKLAND STID 1090

Dear Ms. Bush and Mr. Huseman:

This office is in receipt and has completed review of the (undated) SEMCO tank removal report documenting the activities and laboratory results associated with the March 18, 1992 closure of a 550-gallon underground storage tank (UST) at the referenced site. This tank was used store waste oil.

The cited report documents the results of laboratory analyses performed on soil samples collected immediately following tank closure, and after limited overexcavation of the UST pit. The initial results obtained from sample #1-C-9 indicate the presence of 2700 parts per million (ppm) of total oil and grease (TOG), 520 ppm total petroleum hydrocarbons as diesel (TPH-D), and 160 ppm TPH as gasoline (TPH-G). Halogenated solvents and semivolatle hydrocarbons were also identified in this initial sample.

Although overexcavation appears to have been successful in removing the bulk of the contaminants from the UST pit, the results of the initial analyses identify that an unauthorized release from the UST system has occurred at this site. An UST Unauthorized Release (Leak) Report must be completed and returned to this office within 15 days of the date of this letter. A copy of this form is attached to this letter for your convenience.

The San Francisco Bay Regional Water Quality Control Board (RWQCB) requires additional environmental investigations to be performed when unauthorized releases are discovered. Such investigations are in the form of a **Preliminary Site Assessment**, or **PSA**. The information gathered during this phase of the investigation will be used to determine an appropriate course of action to further investigate and/or remediate the site.

Ms. Bush / Mr. Huseman  
RE: 2025 Telegraph Ave., Oakland  
September 8, 1992  
Page 2 of 3

The PSA must be conducted in accordance with the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, the State Water Resources Control Board Leaking Underground Fuel Tank (LUFT) Field Manual, and Article 11 of Title 23, California Code of Regulations.

In order to proceed with a PSA, you should obtain the professional services of a reputable environmental consultant. Your responsibility is to have the consultant submit for review a PSA work plan outlining planned activities pertinent to meeting the criteria described in the referenced guidance documents. These criteria are broadly outlined in the attached Appendix A.

The Department, through an agreement with the RWQCB, will oversee the assessment and remediation of your site as the lead agency. Our oversight will include the review of and comment on work proposals and 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, in Pleasanton. 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 to ground water.

The PSA work plan is due within 45 days of the date of this letter, **or by October 23, 1992**. Work should commence no later than 30 days following work plan approval.

An initial PSA report must be submitted within 45 days of the completion of this phase of work at this site. Subsequent reports are to be submitted **quarterly** until this site qualifies for final RWQCB "sign off."

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

- o Details and results of all work performed during the reporting period: 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 (including QA/QC data), tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of ground water contamination and characterization



Ms. Bush / Mr. Huseman  
RE: 2025 Telegraph Ave., Oakland  
September 8, 1992  
Page 3 of 3

- o Interpretation of results: water level contour maps showing gradient, free and dissolved product plume definition maps for each target compound, geologic cross sections, etc.
- o Recommendations for additional work

All reports and proposals must be submitted under seal of a California-registered geologist or civil engineer with the appropriate environmental background. Please include a statement of qualifications for each lead professional involved with this project.

Please be advised that this is an official request for technical reports pursuant to California Water Code Section 13267(b). Failure to respond may result in the referral of this case to the RWQCB for enforcement action.

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

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

attachments

cc: Rafat A. Shahid, Assistant Agency Director, Env. Health  
Gil Jensen, Alameda County District Attorney's Office  
Rich Hiett, RWQCB  
Jim O'Neil, Goodyear Tire and Rubber Co.  
6666 East Washington Blvd.  
L.A., CA 90040

Ed Howell - files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R01023

February 15, 1991

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

Ms. Nancy Bush  
D.R. Stephens & Partners et al. No. 14  
550 Montgomery Street, 10th Floor  
San Francisco, CA 94111

Mr. Rick Huseman  
Goodyear Tire & Rubber Co.  
1800 Merced Street  
San Leandro, CA 94577

Mr. Rick Grokosky  
Merrit Tire & Brake Inc.  
3430 Castro Valley Blvd.  
Castro Valley, CA 94546

**\*\*\* Second Notice of Violation \*\*\***

**RE: Underground Storage Tank requirements for Merrit Tire and  
Brake Service Center, 2025 Telegraph Ave. Oakland 94612**

Dear Ms. Bush, Mr. Huseman & Mr. Grokosky:

This letter is to inform you of the necessity of obtaining a valid underground storage tank permit for the waste oil tank at the above facility. Previous correspondence to all of the above parties from Alameda County Hazardous Materials Division has thus far been ineffective in attaining compliance with the California Underground Storage Tanks Law. You are currently in violation of Title 23 of the CA Code of Regulations pertaining to underground storage tanks. You are required to do one of the following:

Obtain a 5 year permit to operate, this entails:

- 1) Annual tank integrity testing
- 2) Inventory reconciliation at least twice per week (for a tank with infrequent input or withdrawal.
- 3) Quarterly monitoring reporting
- 4) Written inventory monitoring plan

This office does not have any tank integrity test records available for the above facility. Annual tank integrity testing is required in Section 2641(5) Title 23 of the CA Code of Regulations (CCR) for all single walled underground storage tanks.

Another option available to you is to remove the underground tank from the property. This procedure requires the submission and approval of a tank closure plan with this department. A properly licenced contractor must remove the tank. Chemical sampling must be performed of soil below the tank. More information and a closure application are available from this office upon request.

Ms. Bush, Mr. Huseman & Mr. Grokosky  
February 15, 1991  
page 2 of 2

You are requested to contact this office within 14 days of the receipt of this letter indicating your intentions with regard to the permitting or removal of the tank at the above site.

Please contact me at (415) 271-4320 if you have any questions.

Sincerely,

*Paul M. Smith*

Paul M. Smith  
Hazardous Materials Specialist

PMS:pms

cc:

Gil Jensen, Alameda County District Attorney's Office of  
Consumer and Environmental Protection  
Rafat A. Shahid, Assistant Agency Director, Alameda County  
Environmental Health Department  
Files

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**

AGENCY  
DAVID J. KEARS, Agency Director



R01023

October 15, 1990

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

Ms. Nancy Bush  
D.R. Stephens & Partners et al. No. 14  
550 Montgomery Street, 10th Floor  
San Francisco, CA 94111

Mr. Rick Huseman  
Goodyear Tire & Rubber Co.  
1800 Merced Street  
San Leandro, CA 94577

Mr. Rick Grokosky  
Merrit Tire & Brake Inc.  
3430 Castro Valley Blvd.  
Castro Valley, CA 94546

**RE: Underground Storage Tank requirements for Merrit Tire and  
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- 2) Inventory reconciliation at least twice per week (for a tank with infrequent input or withdrawal.
- 3) Quarterly monitoring reporting
- 4) Written inventory monitoring plan

This office does not have any tank integrity test records available for the above facility. Annual tank integrity testing is required in Section 2641(5) Title 23 of the CA Code of Regulations (CCR) for all single walled underground storage tanks.

Another option available to you is to remove the underground tank from the property. This procedure requires the submission and approval of a tank closure plan with this department. A licenced contractor must be remove the tank. Chemical sampling must be performed of soil below the tank excavation. More information and applications are available from this office upon request.

Ms. Bush, Mr. Huseman & Mr. Grokosky  
October 15, 1990  
page 2 of 2

You are requested to contact this office within 14 days of the receipt of this letter indicating your intentions with regard to the permitting or removal of the tank at the above site.

Please contact Paul Smith, Hazardous Materials Specialist at (415) 271-4320 if you have any questions.

Sincerely,

*Paul M. Smith*

Paul M. Smith  
Hazardous Materials Specialist

PMS:pms

cc:

Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection  
Rafat A. Shahid, Assistant Agency Director, Environmental Health  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R01023

Certified Mailer # P 062 128 272

August 21, 1990

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

D.R. Stephens & Partners et al. No. 14  
550 Montgomery Street  
10th Floor  
San Francisco, CA 94111

**\*\*\*Second Notice of Violation \*\*\***

**RE: Illegal Waste Disposal and Unpermitted Underground at  
Goodyear (Merrit Tire and Brake) Service Center  
2025 Telegraph Ave. Oakland 94612**

Dear Ms. Bush,

This letter is a follow-up to earlier correspondence with regard to the five unmarked 55 gallon drums which had been located outside of the above property. Upon inspection the drums have been moved inside to the currently unoccupied building. In a letter dated August 7, 1990 you stated that the according to Goodyear Tire and Rubber Inc. the hazardous waste material had been removed from this site.

We had requested that documentation from a hazardous waste recycler/hauler confirming that removal had occurred be provided to this office. As of the date of this letter we have not received the documentation for hazardous waste removal from this site.

Upon site inspection and subsequent review of our files it was determined that there is an underground waste oil storage tank located on this property. Merrit Tire and Brake had been issued a 6 month permit to operate on September 30, 1988. This tank is currently unpermitted.

It is violation of the CA Health and Safety Code (Section 25299) for any owner or operator of an underground storage tank to:

- 1 Operate an underground storage tank without a permit;
- 2 Fail to monitor the tank as required by the permit;
- 3 Fail to maintain proper records;
- 4 Fail to report an unauthorized releases;
- 5 Fail to properly close an underground storage tank.


Owners of operators of underground storage tanks may be liable for a civil penalty of up to \$5000.00 per day per violation of the above provisions.

Ms. Nancy Bush  
August 21, 1990  
Page 2 of 2

You are requested to either permit this underground storage tank or submit a closure plan to remove it. Permit requirements include an annual tank integrity test, daily inventory reconciliation, quarterly monitoring reporting, and a monitoring and emergency response plan.

You are requested to respond to the requirements of this letter within 21 days; or by September 14, 1990. If you have any questions contact me at (415) 271-4320.

Sincerely,



Paul M. Smith  
Hazardous Materials Specialist

cc:  
Gil Jensen, Alameda County District Attorney, Office of Consumer  
and Environmental Protection  
Ms. Marlene West, Goodyear

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R01023

Certified Mailer # P062 127 873

July 24, 1990

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

D.R. Stephens & Partners et al. No. 14  
550 Montgomery Street  
10th Floor  
San Francisco, CA 94111

\*\*\* Notice of Violation \*\*\*

RE: Illegal Waste Disposal at Goodyear (Meritt Tire and  
Brake) Service Center 2025 Telegraph Ave. Oakland 94612

Dear Ms. Busch,

Upon inspection of the abandoned Goodyear Tire facility located at the above address five unmarked 55 gallon drums were discovered located in the back of the property. The drums were unlabeled and improperly covered. It is believed that these drums contain waste motor oil; however, the contents of these drums is currently unknown.

You are currently in violation of Section 25189.5 of the California Health and Safety Code (H&SC) for illegal storage and disposal of a hazardous waste.

You are requested to determine the contents of these drums and dispose of this material at a proper hazardous waste storage or treatment facility and to mail a copy of the hazardous waste receipt or manifest documenting disposal to this office. You are requested to respond to this letter within 10 days; or by August 7, 1990.

If you have any questions contact me at (415) 271-4320.

Sincerely,

*Paul M. Smith*

Paul M. Smith  
Hazardous Materials Specialist

8/2 9013  
C. Wong

cc:

Gil Jensen, Alameda County District Attorney, Office of Consumer  
and Environmental Protection

Mr. Bruce Riches, Goodyear, Certified Mail #P 062 127 874

Nancy Busch, D.R. Stephens & Co.



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R01023

Certified Mailer # P 062 127 875

July 24, 1990

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

D.R. Stephens & Partners et al. No. 14  
550 Montgomery Street  
10th Floor  
San Francisco, CA 94111

\*\*\* Notice of Violation \*\*\*

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Brake) Service Center 2025 Telegraph Ave. Oakland 94612

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You are requested to determine the contents of these drums and dispose of this material at a proper hazardous waste storage or treatment facility and to mail a copy of the hazardous waste receipt or manifest documenting disposal to this office. You are requested to respond to this letter within 10 days; or by August 7, 1990.

If you have any questions contact me at (415) 271-4320.

Sincerely,

Paul M. Smith  
Hazardous Materials Specialist

cc:  
Gil Jensen, Alameda County District Attorney, Office of Consumer  
and Environmental Protection  
Mr. Bruce Riches, Goodyear  
Nancy Busch, D.R. Stephens & Co.