

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Ro# 1101  
RAFAT A. SHAHID, DIRECTOR

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

StID 2259

April 19, 1996

Ms. Barbara Allen  
718 Douglas Ave  
Oakland, CA 94603

**RE: Workplan Approval for 718 Douglas Ave, Oakland 94603**

Dear Ms. Allen:

I have completed review of ICES' April 1996 Groundwater Investigation workplan for the above referenced site. The proposal to advance three soil borings to first encountered groundwater and collect three "grab" groundwater samples to determine if groundwater quality has been impacted by the former fuel release at the site is acceptable. Field work should commence within 45 days of the date of this letter, or **by May 31, 1996**. Please notify me at least 72 hours prior to the start of field activities.

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

eva chu  
Hazardous Materials Specialist

cc: Peng Leong, ICES, P.O. Box 11582, Berkeley, CA 94712-2582  
Cheryl Gordon, SWRCB Cleanup Fund  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0# 1101

ARNOLD PERKINS, DIRECTOR  
RAFAT A. SHAHID, DEPUTY DIRECTOR

StID 2259

January 17, 1996

Ms. Barbara Allen  
718 Douglas Ave  
Oakland, CA 94603

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

RE: GWI at 718 Douglas Ave, Oakland, CA 94603

Dear Ms. Allen:

I have completed review of ICES' December 1995 Remedial Activities report for the above referenced site. It appears there has been adequate source removal, soil treatment, and delineation of soil contamination due to the release of fuel products from the former underground storage tanks removed in December 1991. No further soil characterization is required at this time.

However, a groundwater investigation (GWI) is required to determine if groundwater quality has been impacted. A workplan for this phase of the investigation is required within 90 days of the date of this letter, or **by April 19, 1996**. Any extensions of the stated deadline, or modifications of the required tasks, must be confirmed in writing by this agency. Failure to comply may result in the removal of your claim from the Underground Storage Tank Cleanup Fund Priority List and/or non issuance of a Letter of Commitment. Please refer to the attached memorandum from the Cleanup Fund regarding their requirements before a Letter of Commitment can be issued obligating funds to assist you with the cleanup of your site.

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

eva chu  
Hazardous Materials Specialist

attachment

*JrB* cc: Cheryl Gordon, SWRCB Cleanup Fund  
Peng Leong, ICES, P.O. Box 11582, Berkeley, CA 94712-2582  
files(aallen5)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R01101

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

StID 2259

July 1, 1994

Ms. Barbara Allen  
718 Douglas Av  
Oakland CA 94603

**Subject: Additional Investigation at 718 Douglas Ave, Oakland**

Dear Ms. Allen:

I have completed review of ICES' June 1994 Preliminary Site Investigation report for the above referenced site. This report documents the sampling and delineation of soil contamination in and around the former tank pit. The extent of soil contamination appears to be limited mostly to the former tank pit, to a depth of 12+ feet. Lower concentrations of diesel were detected at 6' depth from test pit TP5, which is between the pit and the office building.

At this time, the pit should be reexcavated to remove any obviously contaminated soil. Confirmatory soil samples should be collected from the side walls and pit bottom and analyzed for TPH-D, TOG, and PAHs. Overexcavation of the pit should commence by August 17, 1994. Please notify me at least 72 hours prior to the start of field work.

We have moved to:

1131 Harbor Bay Parkway, 2nd Floor  
Alameda, CA 94502

Phone lines are not available until July 8, 1994. But, I may be reached via (510) 271-4330. If you have any questions, do not hesitate to call.

Sincerely,

eva chu  
Hazardous Materials Specialist

cc: Peng Leong, ICES, P.O. Box 11582, Berkeley, CA 94701  
files

aallen4

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R01101

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

StID 2259

March 15, 1994

Mr. Peng Leong  
ICES  
P.O. Box 11582  
Berkeley, CA 94701

**Subject: Workplan Approval for 718 Douglas Ave., Oakland 94603**

Dear Mr. Leong:

I have completed review of your response to my letter of January 28, 1994 regarding the Preliminary Site Investigation at the above referenced site. Your proposal to excavate several test pits at the site is acceptable. Once the volume and severity of soil contamination has been assessed, the final disposition of the soil will be determined. After this phase of work, a workplan will be submitted for the installation of monitoring wells to determine if the petroleum hydrocarbon release has impacted groundwater.

All soil and groundwater samples should be analyzed for TPH-G, TPH-D, TOG, and BTEX. If you have any questions, I can be reached at (510) 271-4530.

Sincerely,

A handwritten signature in cursive script, appearing to read 'eva chu'.

eva chu  
Hazardous Materials Specialist

cc: Barbara Allen, 718 Douglas Ave., Oakland, CA 94603  
files

aallen3

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R01101

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 2259

January 28, 1994

Mr. Peng Leong  
ICES  
P.O.Box 11582  
Berkeley, CA 94701

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

**Subject: PSA for 718 Douglas Ave., Oakland, CA 94603**

Dear Mr. Leong:

I have completed review of ICES' January 12, 1994 Work Plan - Preliminary Site Investigation report for the above referenced site. The workplan is not acceptable until the following has been addressed:

1. It is unclear if the pit will be re-opened for over-excavation, or if soil borings are proposed to delineate the extent and severity of soil contamination.
2. The stockpiled soil was not bioremediated to acceptable levels before it was used to backfill the former tank pit. How will this fill material be characterized to determine if it can be left in place, or if it is to be taken to an approved landfill?
3. A minimum of one groundwater monitoring well is required in the down-gradient direction of the former tank pit. The well will be used to evaluate groundwater quality beneath the site. Will the well(s) be installed at a later date?
4. Soil and groundwater samples must be analyzed for TPH-G, and BTEX, in addition to TPH-D.
5. All technical reports, including the work plan proposal, must be submitted under seal of a California Registered Geologist, Certified Engineering Geologist, or Registered Civil Engineer.

Please submit an amended workplan **within 30 days of the date of this letter** addressing the above concerns. If you have any questions, I can be reached at (510) 271-4530.

eva chu  
Hazardous Materials Specialist

cc: Barbara Allen, 718 Douglas Ave., Oakland, CA 94603  
files (aallen3)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R01101

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 2259

October 1, 1993

Mrs. Barbara Allen  
Abdo Allen & Co.  
718 Douglas Ave.  
Oakland, CA 94603

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

**Subject: PSA for 718 Douglas Ave., Oakland 94603**

Dear Mrs. Allen:

Enclosed is a copy of a letter from this office, dated December 30, 1992, requesting a workplan for determining the extent of petroleum hydrocarbon contamination resulting from the former leaking underground storage tanks (USTs) removed from the above referenced site in December 1991. Under unforeseen circumstances, your late husband was unable to initiate the process to obtain a consultant to prepare a workplan for a Preliminary Site Assessment (PSA).

Still, you as the responsible party, should be proactive in starting this investigation. Please submit a PSA workplan to this office **within 45 days of the date of this letter.**

Also enclosed is information about the UST cleanup fund.

If you have any questions or comments, please contact me at the above number.

Sincerely,

eva chu  
Hazardous Materials Specialist

enclosure

cc: files

aallen2

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

StID 2259

December 30, 1992

Mr. Abdo Allen  
718 Douglas Ave  
Oakland, CA 94603

**Subject: Additional Work Required at 718 Douglas Ave.,  
Oakland, CA 94603**

Dear Mr. Allen:

This office has completed review of the file for the above referenced site. When two underground storage tanks (USTs) were removed in December 1991, soil samples taken from native soil beneath the UST revealed up to 850 ppm TPH-D (parts per million total petroleum hydrocarbons as diesel). Samples collected after further excavation in January 1992 still exhibited up to 450 ppm TPH-D in native soil.

On March 12, 1992, Mr. Barney Chan of this office sent a letter requesting a work plan be submitted for further subsurface investigations at this site. To date this office is not in receipt of such a work plan.

A soil sample was taken from the center of the pit in April 1992 revealing up to 49 ppm TPH-D. In a recent conversation you said the 50+ cubic yards of stockpiled soil, which was contaminated with petroleum hydrocarbons, was used to backfill the UST pit. You should be aware that this agency does not approve of backfilling UST pits with contaminated soil. Prior to backfilling with this soil it must be remediated and analyzed to show no detectable levels of petroleum hydrocarbons remain.

At this time, you are directed to perform additional subsurface investigations. In order to proceed with this investigation, you should obtain the professional services of a reputable environmental consultant. Your responsibility is to have the consultant submit for review a proposal outlining planned activities for the determination of the extent and severity of soil and ground water contamination at this site. Such an investigation shall be in the form of a **Preliminary Site Assessment**, or PSA. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCS Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, the State Water Resources Control Board LUFT Field Manual, and Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached Appendix A.

ESN

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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

Abdo Allen  
re: PSA for 718 Douglas, Oak.  
December 30, 1992

Page 2

The PSA proposal is due within 45 days of the date of this letter. Once the proposal is approved field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for RWQCB "sign off." All reports and proposals must be submitted under seal of a California Registered Geologist, Certified Engineering Geologist, or Registered Civil Engineer.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB. Copies of all proposals and reports must also be sent to Mr. Rich Hiett of the RWQCB.

Should you have any questions about the content of this letter, please contact me at (510) 271-4530.

Sincerely,



Eva Chu  
Hazardous Materials Specialist

cc: Rich Hiett, RWQCB  
Gil Jensen, Alameda County District Attorney's Office  
Edgar Howell/files

aallen



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director  
StID 2259

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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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

December 30, 1992

Mr. Abdo Allen  
718 Douglas Ave  
Oakland, CA 94603

**Subject: Additional Work Required at 718 Douglas Ave.,  
Oakland, CA 94603**

Dear Mr. Allen:

This office has completed review of the file for the above referenced site. When two underground storage tanks (USTs) were removed in December 1991, soil samples taken from native soil beneath the UST revealed up to 850 ppm TPH-D (parts per million total petroleum hydrocarbons as diesel). Samples collected after further excavation in January 1992 still exhibited up to 450 ppm TPH-D in native soil.

On March 12, 1992, Mr. Barney Chan of this office sent a letter requesting a work plan be submitted for further subsurface investigations at this site. To date this office is not in receipt of such a work plan.

A soil sample was taken from the center of the pit in April 1992 revealing up to 49 ppm TPH-D. In a recent conversation you said the 50+ cubic yards of stockpiled soil, which was contaminated with petroleum hydrocarbons, was used to backfill the UST pit. You should be aware that this agency does not approve of backfilling UST pits with contaminated soil. Prior to backfilling with this soil it must be remediated and analyzed to show no detectable levels of petroleum hydrocarbons remain.

At this time, you are directed to perform additional subsurface investigations. In order to proceed with this investigation, you should obtain the professional services of a reputable environmental consultant. Your responsibility is to have the consultant submit for review a proposal outlining planned activities for the determination of the extent and severity of soil and ground water contamination at this site. Such an investigation shall be in the form of a **Preliminary Site Assessment**, or PSA. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, the State Water Resources Control Board LUFT Field Manual, and Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached Appendix A.

Abdo Allen  
re: PSA for 718 Douglas, Oak.  
December 30, 1992

Page 2

The PSA proposal is due within 45 days of the date of this letter. Once the proposal is approved field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for RWQCB "sign off." All reports and proposals must be submitted under seal of a California Registered Geologist, Certified Engineering Geologist, or Registered Civil Engineer.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB. Copies of all proposals and reports must also be sent to Mr. Rich Hiett of the RWQCB.

Should you have any questions about the content of this letter, please contact me at (510) 271-4530.

Sincerely,



Eva Chu  
Hazardous Materials Specialist

cc: Rich Hiett, RWQCB  
Gil Jensen, Alameda County District Attorney's Office  
Edgar Howell/files

aallen

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Roll 101

RAFAT A. SHAHID, Assistant Agency Director

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

March 12, 1992  
STID# 2259

Abdo S. Allen Co.  
Attn: Mr. Abdo Allen  
718 Douglas Ave.  
Oakland CA 94603

Re: Request for Work Plan for Subsurface Investigation at Abdo S.  
Allen Co., 718 Douglas Ave., Oakland CA 94603

Dear Mr. Allen:

Our division has received the analytical results from soil samples taken from the 1000 gallon diesel and 1000 gallon fresh oil underground tank removals at the above site. These results which you have provided to our office were performed by Trace Analysis Laboratory. These results of soil samples taken from the ends of each tank indicate Total Petroleum Hydrocarbons as diesel (TPHd) on the north end of the diesel tank and on both north and south ends of the fresh oil tank. Concentrations as high as 850 parts per million (ppm) were found in these samples. In addition, after further excavation and soil sampling at the east and west sides of the tank pit, the concentration of TPHd was still 450 ppm on the west side. Lower levels of Total Petroleum Hydrocarbons as gasoline (TPHg) were also found in these samples. At this time it appears that hydrocarbon contamination may still exist on the west, south and north sides of the excavation pit. Granted, the north side closely borders the fenced Douglas Ave. side of your site and restricts further excavation.

The county uses the "Tri-Regional Board Guidelines" as the guidance document to determine when further investigation is required at underground storage tank removal sites. This document states that a subsurface soil and ground water investigation is required when a soil sample taken from one to two feet underneath a tank contains total petroleum hydrocarbons as gasoline or diesel equal to or exceeding 100 ppm.

Because of the soil results previously stated, you are requested to submit a work plan which properly determines the full extent of soil and ground water contamination and presents a plan to remediate said contamination. Enclosed please find Appendix A, Workplan for Initial Subsurface Investigation, a guidance document provided by Regional Water Quality Control Board (RWQCB). This document outlines the general requirements for the contents of an acceptable work plan.

Mr. Abdo S. Allen  
718 Douglas Ave.  
STID # 2259  
March 12, 1992  
Page 2.

Enclosed you will also find an Unauthorized Petroleum Fuel Release (Leak) form to be completed by you or your designee.

Please provide the requested work plan and completed Leak form to our office within thirty (30) days of receipt of this letter. All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and to the RWQCB to the attention of Mr. Richard Hiatt. Their address is 2101 Webster St., Fourth Floor, Oakland CA 94612.

Please be advised that this is a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to respond may subject Abdo S. Allen Co. to civil liabilities. Any extensions of agreed upon time deadlines must be confirmed in writing by either this division or the (RWQCB).

You may 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. Hiatt, RWQCB

WP718Douglas

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Director



RO1101

Telephone Number: (415)

October 9, 1991

Mr. Abdo Allen  
718 Douglas Ave.  
Oakland CA, 94603

Re: Underground Tank Closure Plan for 718 Douglas Ave., 94603

Dear Mr. Allen:

Upon review of your Underground Tank Closure Plan for the two underground fuel tanks at the above site, a number of items need to be addressed prior to our division's approval. Please provide the requested information within 15 days to allow us to proceed in our plan approval. You should be aware that until the tanks have been removed you are in violation of sections 25299 and 25298 which require the operator or owner of an underground tank to either permit or properly close the underground tank.

The following items need correction/clarification:

1. Item 5 requires the EPA I.D. number which the tanks will be offhauled under. Note that the tanks are considered hazardous waste. An EPA I.D. number can be obtained by calling (916) 324-1781.
2. In item 6 you stated that you have a CA21 license. According to the State Contractor's Board, this license is not authorized for tank removals. Please verify your qualification by giving written approval from this Board or identify an acceptable alternate contractor.
3. Item 15, you are required to sample and analyze two samples at each end of the tanks, one to two feet into the native soil, for a total of four samples. You are also required to take a water sample if water is found in the excavation pit. The stockpiled soil must be segregated and sampled at a rate of 1 discrete per 20 cubic yard for reuse or 4 discrete per 50 cubic yards, to be composited in the laboratory, for land disposal.
4. Item 16, regarding the analysis of the samples, was not completed. Please note that the appropriate parameters for analysis are listed on Table #2, Recommended Minimum Verification Analyses for Underground Tank Leaks, of the closure instructions. For gasoline, TPH g, BTEX and Total Lead would be the required analyses.
5. Item 17 requires that you submit a site specific Health and Safety Plan, the elements of which are listed on page 8 of the closure instructions.

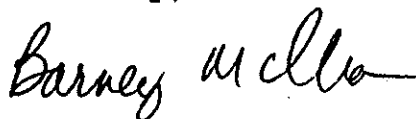
Mr. Abdo Allen  
October 9, 1991  
UGT Closure Plan for 718 Douglas Ave.  
Page 2

6. Item 18, please submit a copy of the contractor's Workman Compensation Certificate.

7. Item 19 requires you to submit a plot plan. Please follow the guidelines in the instruction package.

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

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney Office  
files

718Doug1

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO1101

April 25, 1991

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

Mr. Abdo S. Allen  
Abdo S. Allen Co.  
718 Douglas Avenue  
Oakland CA 94603

Re: Underground Tanks at 718 Douglas Avenue, Oakland 94603 dba  
Abdo S. Allen Co.

NOTICE OF VIOLATION

Dear Mr. Allen:

An inspection was conducted on January 10, 1991 of the above referenced business by Barney Chan, Hazardous Materials Specialist from our office. At that time you stated that your intentions were to remove the two 1000 gallon underground tanks at this site. In a February 1, 1991 letter from our office you were requested to complete and return the Underground Tank Removal form, given to you on the January 10, 1991 inspection, within 30 days. To this date we have not received this completed form. Please be advised of your legal obligation to either register and permit the tanks or close/remove them.

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 failing to properly close an underground storage tank, as required by section 25298.

Please notify our agency in writing within ten (10) days as to your intentions to correct this violation.

If you have any questions concerning this matter, please contact the undersigned at 271-4320.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Edgar Howell, Chief, Hazardous Materials Division

4/2

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R01101

February 1, 1991

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

Mr. Abdo S. Allen  
Abdo S. Allen Co.  
718 Douglas Avenue,  
Oakland, Ca 94603

Re: Underground Tank Removals at 718 Douglas Avenue

Dear Mr. Abdo:

As a followup to our conversation on January 10, 1991 at your company's site, I would like to confirm your intentions to remove the two 1000 gallon waste oil tanks at the above referenced location. You were requested to complete and return Underground Tank Removal/Modification forms within 30 days of this conversation along with a check for \$642.00, the fee for the County's oversight for the removal of two underground tanks.

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

Sincerely,

*Barney M Chan*

Barney M. Chan  
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Edgar Howell, Chief, Hazardous Materials Division