

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#1104
RAFAT A. SHAHID, DIRECTOR

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

StID 2996

March 7, 1996

Mrs. Lili Good
5696 Colton Blvd
Oakland, CA 94611

Ms. Marla Guensler
Exxon
P.O. Box 4032
Concord, CA 94524

RE: Well Decommission at 2200 E. 14th Street, Oakland, CA

Dear Mrs. Good and Ms. Guensler:

This office and the S.F. 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-5) should be decommissioned, if it 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 Flood Control and Water Conservation, Zone 7. They can be reached at (510) 484-2600.

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

Sincerely,

eva chu
Hazardous Materials Specialist

cc: files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R01104

RAFAT A. SHAHID, Assistant Agency Director

ALAMEDA COUNTY HEALTH CARE SVCS
DEPARTMENT OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIVISION
1131 HARBOR BAY PKWY STE 250
ALAMEDA CA 94502-6577 cc:451

August 21, 1995

Ms. Lili Good
5696 Colton Blvd
Oakland, CA 94611

Subject: Property located at 2200 East 14th Street, Oakland, CA 94606

Dear Ms. Good:

This letter acknowledges and approves the request you made to this Department in your letter dated August 14, 1995 to extend the deadline for proper disposal of the unlabelled drums and contents thereof, located at the subject property, to September 30, 1995. You must provide copies of manifests of disposal to this office no later than October 6, 1995.

If you have any questions or concerns, please contact me at (510) 567-6863.

Sincerely,

Cathy Gates
Registered Environmental Health Specialist

cc: Eva Chu, ACDEH

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RO1104

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

StID 2996

July 28, 1995

Ms. Marla Guensler
Exxon Company
P.O. Box 4032
Concord, CA 94524-2032

RE: Workplan Implementation at 2200 E. 14th St, Oakland 94606

Dear Ms. Guensler:

On May 2, 1995 this office approved the workplan for the installation of two additional monitoring wells south of the former dispensers and waste oil tank pit. Field work was to have commenced by June 21, 1995. Your consultant at Environmental Resolutions, Inc, requested an extension of this deadline as negotiations are currently ongoing between counsel for Exxon and Ms. Lili Good. However, Ms. Good has informed me on several occasions that no attempts have been made to contact her regarding this matter.

At this time, field work for the installation of the monitoring wells should begin within 30 days of the date of this letter, or **by August 30, 1995**. It is recommended that you also contact Mr. Lano Choung, the current property owner, for access. **Failure to respond will result in referral of this case to the RWQCB or Alameda County District Attorney to consider for enforcement action. Modification of required tasks or extensions of stated deadlines must be confirmed in writing by either this agency or the RWQCB.**

If you have any questions, please contact me at (510) 567-6762.

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

eva chu
Hazardous Materials Specialist

cc: Lano Choung, 1361 E. 24th Street, Oakland 94611
Lili Good, 5696 Colton Blvd, Oakland 94611
Marc Briggs, ERI, 359 Marin Keys Blvd, #20, Novato 94949
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R01104

RAFAT A. SHAHID, Assistant Agency Director

ALAMEDA COUNTY-ENV. HEALTH DEPT.
ENVIRONMENTAL PROTECTION DIV.
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577
(510)567-6700

StID 2996

May 2, 1995

Ms. Marla Guensler
Exxon
P.O. Box 4032
Concord, CA 94524-2032

RE: Workplan Approval for Former Exxon RAS #7-7516, 2200 E 14th
Street, Oakland, CA 94606

Dear Ms. Guensler:

I have completed review of Environmental Resolutions, Inc's April 1995 Corrective Action Plan for the above referenced site. The proposal to install two monitoring wells south of the former dispensers and waste oil tank pit is acceptable. In addition, soil samples should be collected from the capillary fringe and analyzed for TPH-G, TPH-D, and BTEX. Soil collected near the waste oil pit should also be analyzed for TOG and chlorinated hydrocarbons.

Field work should commence within 45 days of the date of this letter, or **by June 21, 1995**. 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: Marc Briggs, ERI, 359 Bel Marin Keys Blvd, Suite 20, Novato
94949
Lili Good, 5696 Colton Blvd, Oakland 94606
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO 1104

RAFAT A. SHAHID, Assistant Agency Director

StID 2996

February 8, 1995

Ms. Marla Guensler
Exxon Co
P.O. Box 4032
Concord, CA 94524-2032

ALAMEDA COUNTY-ENV. HEALTH DEPT.
ENVIRONMENTAL PROTECTION DIV.
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577
(510)567-6700

RE: Additional Investigations at 2200 E 14th St, Oakland 94606

Dear Ms. Guensler:

It is our understanding that three underground storage tanks (USTs), a gasoline, a diesel, and a waste oil tank, were removed from the above referenced site on June 7, 1973, prior to the sale of the property to Mr. Jacques Pankove and Ms. Helene Lili Good. Our records indicate the USTs were owned and operated by Exxon.

Pursuant to the California Code of Regulations, Title 23, Article 11, Section 2720, Exxon was named a responsible party since Exxon was the owner/operator of the tanks up to June 6, 1973, and was the property owner until 1974 when the tanks were removed. Exxon was hence, the last owner/operator of the USTs immediately before the discontinuation of their use.

Site assessment to date has included the advancement of soil borings around the former tank pits and pump island to delineate the extent of soil contamination resulting from the unauthorized release of petroleum hydrocarbons from the former USTs. Elevated levels of up to 10,000 ppm TPH-D, 2,600 ppm TPH-G, 12,000 ppm TOG, among others, have been detected in soil. Contaminated soil has not been overexcavated or otherwise remediated. Three groundwater monitoring wells have also been installed at the site.

Since the removal of the USTs, all site characterization costs have been paid by Ms. Good. Her attorney, Ms. Julie Rose, has made several attempts, to no avail, to obtain Exxon's cooperation and participation in the cleanup of the site. Ms. Good is no longer financially able to continue with further site investigation. Ms. Good and Mr. Pankove are not eligible for SB 2004 funding as neither were owners/operators of the subject USTs.

Exxon, who could be perceived as the primary responsible party, should continue with the site investigation and any appropriate corrective action. Presuming the foregoing account is correct,

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01104

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

December 23, 1993
STID 2996

Ms. Lili Good
5696 Colton Blvd.
Oakland, CA 94611

RE: 2200 E. - 14th St., Oakland, CA 94606

Dear Ms. Lili Good,

This office has received and reviewed a Quarterly Groundwater Monitoring Report for the Third Quarter 1993 dated October 25, 1993 by Blymyer Engineers, Inc. This office accepts the report with the following comment:

It is anticipated that you may be requesting site closure soon. Enclosed is a format which is required for closure to be considered.

If you have any questions or comments, please contact this office at (510) 271-4530.

Sincerely,

Thomas Peacock, Supervising HMS
Hazardous Material Division

cc: Lano Choung, Nguyen Qua, & Lan Chung, 1361 E. 24th St.,
Oakland, CA 94611
Edgar Howell, Chief - Files
Marla Guensler, Exxon Co. USA, P.O. Box 4032, Concord, CA
94524

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R01104

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

August 17, 1993
STID 2996

Ms. Lili Good
5696 Colton Blvd.
Oakland, CA 94611

RE: 2200 E. - 14th St., Oakland, CA 94606

Dear Ms. Lili Good,

This office has received and reviewed a Quarterly Groundwater Monitoring Report for the Second Quarter 1993 dated June 28, 1993 by Blymyer Engineers, Inc. This office accepts the report with the following comment:

It is anticipated that you may be requesting site closure soon. Enclosed is a format which is required for closure to be considered.

If you have any questions or comments, please contact this office at (510) 271-4530.

Sincerely,

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

Thomas Peacock, Supervising HMS
Hazardous Material Division

cc: Lano Choung, Nguyen Qua, & Lan Chung, 1361 E. 24th St.,
Oakland, CA 94611
Edgar Howell, Chief - Files
Marla Guensler, Exxon USA, P.O. Box 4032, Concord, CA 94524

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01104

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 23, 1993
STID 2996

Ms. Lili Good
5696 Colton Blvd.
Oakland, CA 94611

RE: 2200 E. - 14th St., Oakland, CA 94606

Dear Ms. Lili Good,

This office has received and reviewed a Quarterly Groundwater Monitoring Report for the First Quarter 1993 dated April 26, 1993 by Blymyer Engineers, Inc. This office accepts the report with the following comments:

1. Well MW-3 had TPHg and benzene just above detection limits. It has been a year and a half since the last analysis so this is not consecutive quarterly monitoring.
2. There were no recommendations on this report. It is anticipated that you may be requesting site closure soon. Enclosed is a format which is required for closure to be considered.

If you have any questions or comments, please contact this office at (510) 271-4530.

Sincerely,

Thomas Peacock, Supervising HMS
Hazardous Material Division

cc: Lano Choung, Nguyen Qua, & Lan Chung, 1361 E. 24th St.,
Oakland, CA 94611
Edgar Howell, Chief - Files
Marla Guensler, Exxon USA, P.O. Box 4032, Concord, CA 94524

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01104

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 10, 1993
STID 2996

Ms. Lili Good
5696 Colton Blvd.
Oakland, CA 94611

RE: 2200 E. - 14th St., Oakland, CA 94606

Dear Ms. Lili Good,

This office has received and reviewed your letter dated January 4, 1993. This office can understand and be somewhat patient with the delay in your receiving the 3 bids required by SB 2004 for cleanup work. However, the letter you received from this office dated December 30, 1992 mainly addressed in comment 2. the need to continue the quarterly groundwater monitoring program. No monitoring has been done for over 1 year and this aspect of your mitigation is required without any limitation of whether or not you obtained 3 bids to each aspect of it.

This office expects the groundwater monitoring program to begin as soon as possible. Sampling should occur with 30 days. Please have the sampler contact this office at least 2 days prior to sampling.

If you have any questions or comments, please contact this office at (510) 271-4530.

Sincerely,

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

Thomas Peacock, Supervising HMS
Hazardous Material Division

cc: Richard Hiett, RWQCB
Lano Choung, Nguyen Qua, & Lan Chung, 1361 E. 24th St.,
Oakland, CA 94611
Edgar Howell, Chief - Files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01104

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

December 30, 1992
STID 2996

Ms. Lili Good
5696 Colton Blvd.
Oakland, CA 94611

RE: 2200 E. - 14th St., Oakland, CA 94606

Dear Ms. Lili Good,

This office has received and reviewed the Quarterly Monitoring Report by Blymer Engineers dated November 20, 1991 concerning the above site. There are recommendations on page 6 that also refer to a plan for removal of contaminated soil from September 1991. The following comments apply to this site:

1. Have any of the recommendation or the specific actions in the plan, which was accepted by this office, been implemented to date?
2. This report (Nov 91) is the last report this office has received. Apparently the quarterly monitoring program was suspended. This is not acceptable. You must begin immediately to continue the remediation of contaminated soils and also to continue groundwater monitoring. It has been over 1 year since any action has been reported to this office.

Enclosed please find a listing of information which is needed in order to obtain site closure from the Regional Water Quality Control Board.

If you have any questions or comments, please contact this office at (510) 271-4530.

Sincerely,

A handwritten signature in cursive script that reads "Thomas Peacock".

Thomas Peacock, Supervising HMS
Hazardous Material Division

cc: Richard Hiett, RWQCB
Lano Choung, Nguyen Qua, & Lan Chung, 1361 E. 24th St.,
Oakland, CA 94611
Edgar Howell, Chief - Files
Enclosure

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



R01104

Telephone Number: (415)

October 22, 1991

Mrs. Lili Good
5696 Colton Blvd.
Oakland, CA 94611

Re: Work Plan Proposal for 2200 E. 14th Street, Oakland CA 94606

Dear Mrs. Good:

Our agency has received and reviewed the September 10, 1991 work plan for the above site submitted by Blymyer Engineers, Inc. This plan describes the further soil excavation at three specific locations on the above property with the intent of removing soils down to several threshold concentrations. Confirmation soil sampling was also proposed to verify the completeness of the soil removal. This work plan is acceptable and work can begin immediately. You should be aware that depending on the findings of this work additional groundwater monitoring may be necessary.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
E. So, RWQCB
D. Fitzpatrick, Blymyer Engineers Inc.

1-2200-WP1

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R01104

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

May 21, 1991

Ms. Lili Good
5696 Colton Blvd.
Oakland, CA 94611-2254

Re: Disposal of Monitoring Well Water at 2200 E. 14th St., Oakland,
CA 94606

Dear Ms. Good:

This letter is to acknowledge that on May 13, 1991 I witnessed the disposal of one of the seven drums of monitoring well water. I assume that the remainder of the drums of monitoring well water were similarly disposed of in the storm drain on the corner of East 14th and 22nd Avenue. This disposal was permitted by a letter from the RWQCB signed by S. Ritchie.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: R. Hiett, RWQCB
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R01104

February 19, 1991

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

Ms. Delane Fitzpatrick
Blymer Engineers, Inc.
1829 Clement Avenue
Alameda, CA 94501

Re: Workplan for Further Investigation at 2200 E. 14th St., Oakland
94606 dba Oriental Auto Sales

Dear Ms. Fitzpatrick:

Alameda County Environmental Health, Hazardous Materials Division has received and reviewed the proposal for further site investigation at the above referenced site as described in the October 17, 1990 report prepared by Blymyer Engineers. In general your workplan is acceptable and you may proceed with the proposed hand augering around the pump island and the abandonment of MW-1. Please note that well abandonment is overseen by Zone 7, Alameda County Flood Control and Water Conservation District, phone # (415) 484-2600. In addition, our agency has the following concerns:

1. Prior to the installation of a groundwater monitoring well in the downgradient direction of the pump island, please notify our agency of its exact location and the reasoning behind this location. This location should be dependent on the hand augering soil results and the verified groundwater gradient. Consideration of an offsite location in East 14th St. should also be given.

2. There seems to be unclear information regarding the borings performed by Azonic Technology, Inc in 1989. Their analytical results indicate 270 ppm TPH gasoline and 270 ppm TPH diesel in borings B-4 and B-3 respectively, the suspected area of former fuel tanks, and TOG and TPH gasoline contamination of 480 ppm and 280 ppm respectively in B-5, the suspected area of a former waste oil tank. It appears that the potential for this type and amount of contamination still exists. Therefore, these areas should also be investigated in your proposed hand augerings, at depths of approximately 8.5', the depth at which contamination was found initially by Azonic.

As stated previously, your workplan is acceptable with the condition that the above two County concerns are addressed. You may contact me at 271-4320 should you have any questions regarding this letter.

Sincerely,

Barney M. Chan, Hazardous Materials Specialist

cc: Lili Goode, Property Owner
L. Feldman, RWQCB
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Ala. Cty. D.A. Office, Consumer & Env. Protection

JA

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R01104

July 18, 1990

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

Ms. Lily Goode
5696 Colton Blvd.
Oakland, CA 94611

Subject: Work Plan for Contamination Assessment
2200 E. 14th Street in Oakland, CA

Dear Ms. Goode:

This letter records the recent conversation between Delane Fitzpatrick of Blymer's Engineers and the Alameda County Environmental Health Department, Hazardous Materials Division concerning the Work Plan for the site shown above. As discussed, the contents of the Plan are acceptable and site assessment work can begin without further notice from this office.

If you have any questions concerning the contents of this letter please feel free to call.

Sincerely,

Ariu Levi, Senior Hazardous Materials Specialist
Environmental Health Department

cc: Rafat Shahid; Alameda County Environmental Health
Gil Jensen; Alameda County District Attorney's Office
Consumer and Environmental Protection
Lester Feldman; SFRWQCB
Delane Fitzpatrick; Blymyer engineers

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SITE: 2200 International Blvd.

R01104

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
470 - 27th Street, Third Floor
Oakland, California 94612
(415)

Certified Mail #P 062 127 734

February 23, 1990

Ms. Lili Good
5696 Colton Blvd.
Oakland, CA 94611

Subject: Unauthorized Release
Removal of Underground Fuel and Waste Oil Tanks
Continental Auto Sales
Oakland, CA

Dear Ms. Good:

Thank you for submitting the results for analysis of subsurface soil and ground water samples taken in response to the underground tank removals from the above shown facility. 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 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.

Good
February 23, 1990
Page 2

I. Introduction

- A. Statement of scope of work
- B. Site map showing location of existing and past underground storage tanks
- 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

Good
February 23, 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

D. 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

Good
February 23, 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 yourself, or 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

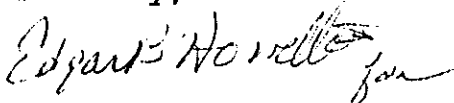
Good
February 23, 1990
Page 5

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). Failure to respond or a late response may result in referral of this case to the RWQCB for enforcement and may subject you to civil liabilities imposed by the RWQCB to a maximum amount of \$1,000 per day. 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 feel free to contact me at 415/271-4320.

Sincerely,



Ariu Levi, Senior Hazardous Materials Specialist
Alameda County Hazardous Materials Program

cc: Gil Jensen, Alameda County District Attorney, Consumer &
Environmental Protection
Rafat Shahid, Assistant Agency Director
Ed Howell, Chief HazMat Unit
Lester Feldman, SFRWQCB
Howard Hatayama, DOHS
Lano Chung,
Files