ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

Scan 1 of 1

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

January 10, 2005

Paul Supple
Atlantic Richfield Company
P.O. Box 6549
Moraga, CA 94570

Subject: Fuel Leak Case No. RO0002526, ARCO #2107, Active Service Station at 3100 Park Blvd., Oakland, California – Response to Report and Workplan

Dear Mr. Supple:

Alameda County Environmental Health (ACEH) has reviewed your November 30, 2004, *Additional Site Investigation Report and Workplan for Offsite Investigation* prepared by URS Corporation for the above-referenced site. Up to 1,300 ug/L TPHg, 1.6 ug/L benzene and 3,700 ug/L MTBE have been detected in groundwater beneath your site. The lateral and vertical extent of contamination is currently undefined. URS proposes installation of 5 additional soil boring/hydropunch pairs to further delineate the vertical and downgradient extent of VOCs in groundwater. We request that you modify your workplan to address the technical comments below. Please submit your addendum following the schedule specified below.

TECHNICAL COMMENTS

1. Target Sampling Depths

Please state the target groundwater sampling depths for your proposed borings, and please state the rationale supporting your target depths. Based on your understanding of the regional geology, please state whether or not your targeted water-bearing zones are likely to be laterally continuous, and whether you anticipate the depth of the target zones beneath ground surface to increase or decrease downgradient of the site. Please amend your sampling plan in the workplan addendum requested below.

2. Vertical Definition

The highest MTBE concentration was detected in boring SB-10/HP-7 between 26 and 30 ft bgs. Concentrations appear to increase with depth in this boring. In accordance with 23 CCR 2725(a), we require that you define the likely vertical extent of contamination. Please propose additional investigation tasks to satisfy this requirement. Please revise your sampling plan in the workplan addendum requested below.

3. Lateral Definition

URS provided no rationale supporting location of borings SB-15/HP-12 and SB-16/HP-13 in the apparent crossgradient direction. Based on the groundwater flow direction, and the groundwater analytical results for previous borings, these sampling locations are not likely to be necessary to define the lateral extent of contamination. In addition, URS proposes locating borings SB-12/HP-9 and SB-13/HP-10 approximately 10 ft apart, and boring SB-14/HP-11 approximately 20 ft from boring SB-13/HP-10. No rationale was provided to support the close spacing of these borings. Further, we are concerned that changes in topography and irrigation of the adjacent

athletic fields at Oakland High School could influence groundwater flow and cause groundwater downgradient of the site to flow increasingly towards the west. Please revise your sampling plan and provide rationale supporting your revised sampling locations in the workplan addendum requested below.

4. Conduit and Well Surveys

URS proposes a preferential pathway assessment as part of the final investigation report. Due to the shallow depth to groundwater in several of the previous borings and the potential presence of storm drains and other subsurface utilities downgradient of the site, beneath Park Blvd., we request that you complete the preferential pathway survey, and consider the potential influence on contaminant migration, prior to proposing additional offsite investigation. The objectives of the conduit study are to 1) locate potential migration pathways, and 2) evaluate the potential for contaminant migration via the identified pathways. We request that you perform a conduit study that details the potential migration pathways and potential conduits (utilities, storm drains, etc.) that may be present in the vicinity of the site. Provide a map showing the location and depth of all utility lines and trenches, including sewers and storm drains, within and near the plume area.

In addition, we request that you locate all wells (monitoring and production wells: active, inactive, standby, decommissioned, abandoned and dewatering, drainage and cathodic protection wells) within 2,000 ft of the subject site. We recommend that you obtain well information from both Alameda County Public Works Agency and the State of California Department of Water Resources, at a minimum. Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. We require that you provide location addresses and copies of DWR driller's reports for all wells identified in your survey. Please include an analysis and interpretation of your findings, and report the results of your conduit and well surveys in the workplan addendum requested below.

5. Groundwater Sampling From Borings SB-10/HP-7 and SB-11/HP-8

In borings SB-10/HP-7 and SB-11/HP-8, first groundwater was reported at 1.3 and 3.8 ft bgs, respectively; however, initial samples were collected at depths of 16 to 20 ft bgs in boring SB-10/HP-7 and 23 to 27 ft bgs in boring SB-11/HP-8. Please state why samples were not collected from more shallow water in the workplan addendum requested below.

6. Sample Analysis

ACEH requested in our January 9, 2004 letter to ARCO that you analyze samples for 1,2 DCA, EDB and ethanol. These analyses do not appear to have been performed. We request that you evaluate the potential presence of these lead scavengers and oxygenate. Please revise your sampling plan in the workplan addendum requested below.

REPORT REQUEST

Please submit your *Workplan Addendum,* which addresses the comments above by **March 30, 2005**. ACEH makes this request pursuant to California Health & Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2778 outline the responsibilities of a responsible party for an unauthorized release from an UST system, and require your compliance with this request.

Professional Certification and Conclusions/Recommendations

The California Business and Professions Code (Sections 6735 and 7835.1) requires that workplans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

Perjury Statement

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late reports or enforcement actions by ACEH may result in you becoming ineligible to receive cleanup cost reimbursement from the state's Underground Storage Tank Cleanup Fund (senate Bill 2004).

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested we will consider referring your case to the County District Attorney or other appropriate agency, for enforcement. California Health and Safety Code, Section 25299.76 authorizes ACEH enforcement including administrative action or monetary penalties of up to $10,000 per day for each day of violation.

Please call me at (510) 567-6719 with any questions regarding this case.

Sincerely,

Robert W. Schultz, R.G.
Hazardous Materials Specialist

cc: Scott Robinson, URS Corporation, 500 12th St., Ste. 200, Oakland, CA 94607-4014
Donna Drogos, ACEH
Robert W. Schultz, ACEH

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

SCAT 9-1-04

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

August 30, 2004

Paul Supple
Atlantic Richfield Company
P.O. Box 6549
Moraga, CA 94570

Subject: Fuel Leak Case No. RO0002526, ARCO #2107, Active Automobile Service Station at 3100 Park Blvd., Oakland, California

Dear Mr. Supple:

Alameda County Environmental Health (ACEH) has reviewed your August 12, 2004, *Site Investigation Report and Well Installation Workplan* prepared by URS Corporation for the above-referenced site. The scope of work performed was not consistent with the March 11, 2004 *Second Addendum to Work Plan for Additional Investigation*. The ACEH-approved March 11, 2004 Workplan Addendum proposed 10 soil borings to groundwater. Only 4 borings were completed to groundwater. No explanation for the variance was provided. There is currently insufficient data to adequately define the extent of soil and groundwater contamination at the site. In addition, we do not concur with URS' proposed technical approach for follow-up investigation. Consequently your investigation report and workplan are not approved. We request that you: 1) complete the previously approved temporary borings and grab groundwater sampling, 2) submit a replacement investigation report with workplan, and 3) address the technical comments below by the due date specified below.

TECHNICAL COMMENTS

1. Groundwater Definition

Rather than installing monitoring wells, ACEH requests that the lateral and vertical extents of groundwater contamination be defined. Please perform depth discrete groundwater sampling from temporary borings and, if necessary, use temporary piezometers to evaluate the groundwater gradient. Depending on the level of confidence in site characterization, and on the need for active site remediation, extended groundwater monitoring *may or may not* be required. We request that you collect data consistent with your March 11 workplan addendum, then evaluate the need for additional temporary borings. If you determine that no additional borings should be required to define the dissolved plume, we request that you support your determination using 1) isoconcentration maps for each depth interval and contaminant of concern and 2) cross-sections drawn perpendicular to and along the plume axis showing vertical distribution of contamination. These critical supporting documents will be used to either appropriately site monitoring wells or to help justify no further action at the site. Please include either a workplan for further soil and groundwater sampling from temporary borings or your isoconcentration maps and cross sections in the report requested below.

2. Depth Discrete Groundwater Sampling

URS collected groundwater samples from the bottoms of the soil borings using disposable bailers. This methodology does not appear appropriate for collecting representative groundwater samples at the site. In boring SB-3, for example, first encountered water was

reported at 5.5 ft bgs. Saturated silty sand was logged between 25 and 26.5 ft bgs. Sand was encountered between 31 ft bgs and the total explored depth of 32 ft bgs. The grab groundwater sample from boring SB-3 was apparently collected as a composite of the entire boring, representing groundwater from 5.5 ft bgs through 32 ft bgs. Groundwater sample SB-3 contained 88 ug/L GRO, 110 ug/L TBA, 34 ug/L MTBE, and 1.1 ug/L TAME. We request that you evaluate each identified water-bearing zone. If the sand encountered at 31 ft bgs has been impacted, additional depth-discrete groundwater sampling will be required to define the vertical extent of contamination. The objectives of depth-discrete groundwater sampling are to 1) determine representative concentrations for comparison to risk-based screening levels and other criteria; 2) define the vertical extent of impact; and 3) characterize concentrations within potential preferential flow paths such as sands or gravels of higher estimated permeability. Please include your evaluation in the report requested below.

3. Regional Hydrogeologic Study

We request that you perform a study of the regional geologic and hydrogeologic setting for your site by reviewing the available technical literature for the area. The objectives of a regional geologic and hydrogeologic study are to 1) provide data to develop an initial Conceptual Site Model (CSM), 2) identify regional hydrogeologic features - and phenomena such as historical water level fluctuations - that could influence or control the migration of contamination, and 3) determine the appropriate scope of initial investigation activities. Background information for your review includes but is not limited to regional geologic maps, United States Geological Survey (USGS) technical reports and documents, Department of Water Resources (DWR) Bulletins, Regional Water Quality Control Board reports on the groundwater basin, data from contaminant investigations in the area, and driller's reports from the well survey requested below (Comment #3). Provide a narrative discussion of the regional geologic and hydrogeologic setting obtained from your background study. Include an evaluation of the potential significance of regional geologic features on site contaminant migration. Use photocopies of regional geologic maps, groundwater contours, cross-sections, etc., to illustrate your results and include a list of the technical references reviewed. Report your results as part of the report requested below.

4. Environmental Screening

We request that you evaluate your results using either the RWQCB-SFBR ESLs or the protocol detailed in ASTM E1739-95(2002) *Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites.* Please include your evaluation in the report requested below.

5. Report Submittals

The subject report was not submitted under cover from Atlantic Richfield Co. certifying the work, and it did not include a statement of professional certification. In addition, the analytical results do not appear to have been uploaded into the State Geotracker database, as no confirmation was provided in the report. Please include these items in the report requested below.

REPORT REQUEST

Please complete the investigation described in your March 11, 2004 workplan addendum and submit a Soil and Groundwater Investigation Report which addresses the comments above by **October 15, 2004**. CCR, Title 23, Chapter 16 requires your compliance with this request.

PROFESSIONAL CERTIFICATION AND CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested we will consider referring your case to the County District Attorney or other appropriate agency, for enforcement. California Health and Safety Code, Section 25299.76 authorizes ACEH enforcement including administrative action or monetary penalties of up to $10,000 per day for each day of violation.

Please call me at (510) 567-6719 with any questions regarding this case.

Sincerely,

Robert W. Schultz, R.G.
Hazardous Materials Specialist

cc: Scott Robinson, URS Corporation, 500 12th St., Ste. 200, Oakland, CA 94607-4014
Donna Drogos, ACEH
Robert W. Schultz, ACEH

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

1-12-04

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

January 9, 2004

Paul Supple
Atlantic Richfield Co.
P.O. Box 6549
Moraga, CA 94570

Dear Mr. Supple:

Subject: Fuel Leak Case No. RO0002526, Arco #2107, 3310 Park Blvd., Oakland, CA 94610

Alameda County Environmental Health (ACEH) staff has reviewed "Work Plan for Additional Investigation" dated June 11, 2003 and "Addendum to Work Plan for Additional Investigation" dated October 29, 2003, both prepared by URS Corp. 10 "Geoprobe" borings are proposed to better characterize to subsurface conditions prior to the installation of monitoring wells. We generally concur with the work proposed. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

1) Soil Sampling –

a) Instead of collecting soil boring samples every 5 ft., as proposed, soil samples shall be collected at a minimum of every 5 ft., including at changes of lithology, at the soil/groundwater interface, and at areas of obvious contamination. Log borings.

b) The borings will be advanced to a sufficient depth to collect water samples. However, the borings may need to extend deeper until impervious soil is encountered.

Please revise your proposal for soil sampling and include in the Work Plan Addendum requested below.

2) Soil and Groundwater Analyses – In addition to the analyses proposed, we request that you also include Ethanol by EPA Method 8260 for groundwater analyses, and the lead scavengers, Ethylene Dibromide (EDB), Ethylene Dichloride (EDC) for soil and groundwater analyses. As with the fuel oxygenates, if any of the latter compounds are detected, and are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan. Please include these revisions in the Work Plan Addendum requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

March 9, 2004 – Workplan Addendum
60 days after Work Plan approval – Soil and Water Investigation Report

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Scott Robinson, URS Corp., 55 S. Market St., Suite 1500, San Jose, CA 95113
Donna Drogos
file

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

04-28-03

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

April 25, 2003

Paul Supple
Atlantic Richfield Co.
P.O. Box 6549
Moraga, CA 94570

Dear Mr. Supple:

Subject: Fuel Leak Case No. RO0002526, Arco #2107, 3310 Park Blvd., Oakland, CA 94610

Alameda County Environmental Health (ACEH) staff has reviewed "Product Line Removal and Upgrade Soil Sampling Report" dated January 31, 2003, prepared by URS Corp. The removal and replacement of gasoline product lines and dispensers on January 7, 2003 found a release had occurred. Soil and groundwater samples collected beneath the product lines and dispensers detected up to 4,000 mg/kg Total Petroleum Hydrocarbons - gasoline (TPHg), 1,100 mg/kg Xylenes, and 4,200 ug/l TPHg, 300 ug/l Benzene, 11,000 ug/l Xylenes, 4,900 ug/l Methyl Tertiary-Butyl Ether (MTBE). We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

A soil and groundwater investigation of contamination from your site is required. Please submit a work plan to investigate the lateral and vertical extent of soil and groundwater contamination from your site.

UST CLEANUP FUND

Please be aware that you may be eligible for reimbursement of the costs of investigation from the California UST Cleanup Fund (Fund). In some cases, a deductible amount may apply. If you believe you meet the eligibility requirements, I strongly encourage you to contact the Fund for an application.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

June 15, 2003 – Work Plan
60 days after Work Plan approval – Soil and Water Investigation Report

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Scott Robinson, URS Corp., 55 S. Market St., Suite 1500, San Jose, CA 95113
Donna Drogos
file

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

R0651

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

May 13, 1998

ATTN: Mr Scott Wilson

Robert H Lee & Assoc
1137 N Mc Dowell Blvd
Petaluma CA 94954

RE: Project # 5031A - Type R,I
at 3310 Park Blvd in Oakland 94610

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of $391.50, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested or any unused monies will be refunded to you or your designee.

The deposit refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently $94 per hour.

Please be sure to write the following identifying information on your check:
- project #
- type of project and
- site address (see RE: line above).

If you have any questions, please contact Amir Gholami at (510) 567-6876.

Sincerely,

Tom Peacock, Manager
Environmental Protection

c: files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

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

V R0 2520
V R0651

February 4, 1992

Mr. Chuck Carmel
ARCO Products Co.
P.O. Box 5811
San Mateo, CA 94402

RE: ARCO Station # 2107, 3310 Park Blvd., Oakland, CA 94610

Dear Mr. Carmel:

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed the Addendum to Report Additional Subsurface Environmental Investigation and Pump Test and Addendum Two to Work Plan Soil and Groundwater Remediation Work Plan for the above facility.

Due to the high groundwater table conditions reported the proposal to install a vapor extraction and pump and treat system, using monitoring wells one and two, is acceptable. However, the following additional concerns still remain regarding the Park Blvd. site:

1) The lateral and vertical extent of the off site contamination has still not been adequately defined. You are required to submit a work plan proposal which will address this matter.

2) The above work plans state that single well extraction at a flow rate of 0.5 gallon per minute should yield an adequate capture zone that will encompass the dissolved hydrocarbons effecting the on site plume. You are required to submit a proposal which will address ground water contamination detected off site

3) With respect to the treatment of hazardous waste on site; you are directed to contact the California Department of Toxic Substances Control regarding the necessary permit requirements.

You are requested to have a representative from Resna notify this office at least 72 hours prior to the commencement of the installation of the remediation system and also prior to the initial start up of the treatment system.

Please feel free to contact me if you are have any questions regarding the above matter at (510) 271-4320.

Sincerely,

Paul M. Smith

Paul M. Smith
Hazardous Materials Specialist

cc:
Kyle Christie, ARCO
Joel Coffman, Resna
Eddy So, SFRWQCB
Howard Hatayama, DHS
Mark Thomson, Alameda County District Attorney's Office of Consumer and Environmental Affairs

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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R0651

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

November 19, 1991

Mr. Chuck Carmel
ARCO Products Co.
P.O. Box 5811
San Mateo, CA 94402

RE: ARCO Station # 2107, 3310 Park Blvd., Oakland, CA 94610

Dear Mr. Carmel:

Alameda County Environmental Health Department, Hazardous Materials Division is in receipt of the August 22, 1991 Additional Subsurface Investigation Report prepared by Resna Applied Geosystems Company.

This report documents the installation of three borings which identified contamination of 130 ppm of Total Oil and Grease (TOG) and 43 ppm Total Petroleum Hydrocarbons as diesel (TPHd) in B-11.

There is some question as to whether initial analysis from the waste oil excavation had occurred when the tank was removed. Because TOG and TPHd were detected in B-11, when conducting the next round of ground water monitoring well sampling you are required to sample MW-4 for the presence of both TOG and TPHd. You are also required to analyze the MW-4 water sample for the presence of halocarbons.

The March quarterly report indicated indicated ground water contamination levels as high as 6,900 ppb Total Petroleum Hydrocarbons as gasoline (TPHg); 760 ppb benzene in MW-3, 520 ppb TPHg; 59 ppb benzene in MW-4, 15,000 ppb TPHg; 510 ppb benzene in MW-5 and nondetectable levels of contaminants in MW-6.

The September 12, 1991 quarterly monitoring report indicated contamination levels of 3,400 ppb of TPHg in MW-3; 620 ppb benzene, MW-4 indicated 56 ppb THPg; 3.9 ppb benzene, MW-5 indicated 16,000 ppb TPHg; 1,500 ppb benzene.

In a recent conversation with your consultant Joel Coffman of Resna I was informed that since the date of the last Subsurface Investigation Report additional off site monitoring wells have been installed. I was also informed that a Work Plan for the treatment of soil and ground water is forthcoming and that monthly updates to this office will be initiated for the above site and also for all other ARCO sites undergoing site mitigation through this office.

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We look forward to the receipt of a report outlining the proposed treatment system for soil and ground water contamination and the receipt of additional analytical data of both on and off site groundwater quality. You are required to submit a treatment proposal report within 30 days of the receipt of this letter.

If you are have any questions concerning any of the above matters please contact me at (510) 271-4320.

Sincerely,

Paul M. Smith

Paul M. Smith
Hazardous Materials Specialist

cc:
Joel Coffman, Applied Geosystems
Lester Feldman, RWQCB
Howard Hatayama, DHS
Mark Thomson, Alameda County District Attorney's Office of Consumer and Environmental Affairs

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

VR02526
R0651

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

December 26, 1990

Mr. Kyle Christie
ARCO Products Co.
P.O. Box 5811
San Mateo, CA 94403

RE: ARCO Station # 2107, 3310 Park Blvd., Oakland, CA 94610

Dear Mr. Christie:

We are in receipt of the last quarterly report entitled: Summary Report Third Quarter 1990, for the Park Blvd. ARCO service station. The underground tanks were removed in 1987 and the extent of local groundwater contamination has still not been adequately defined.

Based upon the results from MW 3, 4, and 5 it is clear that there is groundwater contamination at this site. In a Notice of Violation issued on February 7, 1990 by this office, you were requested to submit a schedule for remedial plan development. No remedial schedule or plan has since been received by this office.

In the anticipated work for next quarter section of the latest quarterly report it is stated that "ongoing subsurface investigation and the preparation of a report summarizing the results of the present phase of work at the site will occur". **You are requested to provide this office with a plan to adequately define the lateral and vertical extent of groundwater contamination within 30 days of the receipt of this letter.**

You are also requested to develop and submit to this office a groundwater remediation plan, to set a time table for the completion of the above and the for the implementation of a remediation system. Both plans requested, must be approved by this office prior to implementation.

A review of our records indicates that a security deposit for the review of the remediation efforts at this site has never been submitted for the above site. This deposit is to cover the expenses incurred by County personnel in the performance of their oversight responsibilities. A record is kept of the hours which an Alameda County employee commits to a project and the deposit is reduced at a rate of $69.00 per hour. This policy is authorized by Section 3-141.6 of the Ordinance Code of the County of Alameda.

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A check for a total of $500.00, made payable to the County of Alameda, must be submitted to this office before any further action can be taken regarding your proposals for this site. Following the completion of the project, the remaining balance of the deposit will be refunded to you.

If you are have any questions concerning any of the above requests please contact me at (415) 271-4320.

Sincerely,

Paul M. Smith

Paul M. Smith
Hazardous Materials Specialist

cc:
Michael J. Barminski, Applied Geosystems
Lester Feldman, RWQCB
Howard Hatayama, DHS
Gil Jensen, Alameda County District Attorney's Office of Consumer and Environmental Affairs
Rafat A. Shahid, Assistant Agency Director, Alameda County Environmental Health Department
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