

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



out
05-05-06

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

May 4, 2006

Mr. James Chung
San Pablo Auto Body
2926 San Pablo Avenue
Oakland, CA 94608

Subject: SLIC Case RO0002567, Chung Property, 2942 San Pablo Avenue, Oakland, CA – Work Plan Approval

Dear Mr. Chung:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site and the document entitled, "Addendum to Work Plan for Additional Site Characterization and Report of Well Survey," dated April 27, 2006. The Addendum addresses ACEH's April 7, 2006 technical comments on the proposed scope of work. We generally concur with the proposed scope of work in the April 27, 2006 Work Plan Addendum provided that the technical comments below are addressed during the field investigation.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1. Soil Vapor Sampling near Boring B10B.** The Addendum proposes four soil vapor samples approximately 5 feet apart surrounding boring B10B. The purpose of the soil vapor sampling is to assess whether a source exists within the area of boring B10B. Therefore, we request that soil vapor samples be collected from six locations on a grid in the area around boring B10B as shown on the attached figure entitled, "Requested Soil Vapor Sampling Locations." We also request that soil vapor sampling be continued as necessary to define the extent of the source area if elevated concentrations of volatile organic compounds (VOCs) are detected in any of the soil vapor samples. The proposed methods for collecting the soil vapor samples are acceptable. Soil gas samples are to be analyzed for VOCs using EPA Method TO-15.
- 2. Soil Sampling for Metals and Cyanide.** In addition to the proposed twelve soil sampling locations, we request that four soil samples be collected from the hummocky area as shown on the attached figure, "Requested Surficial Soil Sampling Locations." When compositing soil samples in the laboratory, please assure that the four requested soil samples from the hummocky area are composited into one sample. If any analytes are detected at concentrations exceeding the Environmental Screening Levels, each of the discrete soil samples is to be analyzed.

TECHNICAL REPORT REQUEST

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

- **August 15, 2006** - Groundwater Monitoring Report for Second Quarter
- **September 8, 2006** - Corrective Action Plan

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

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.

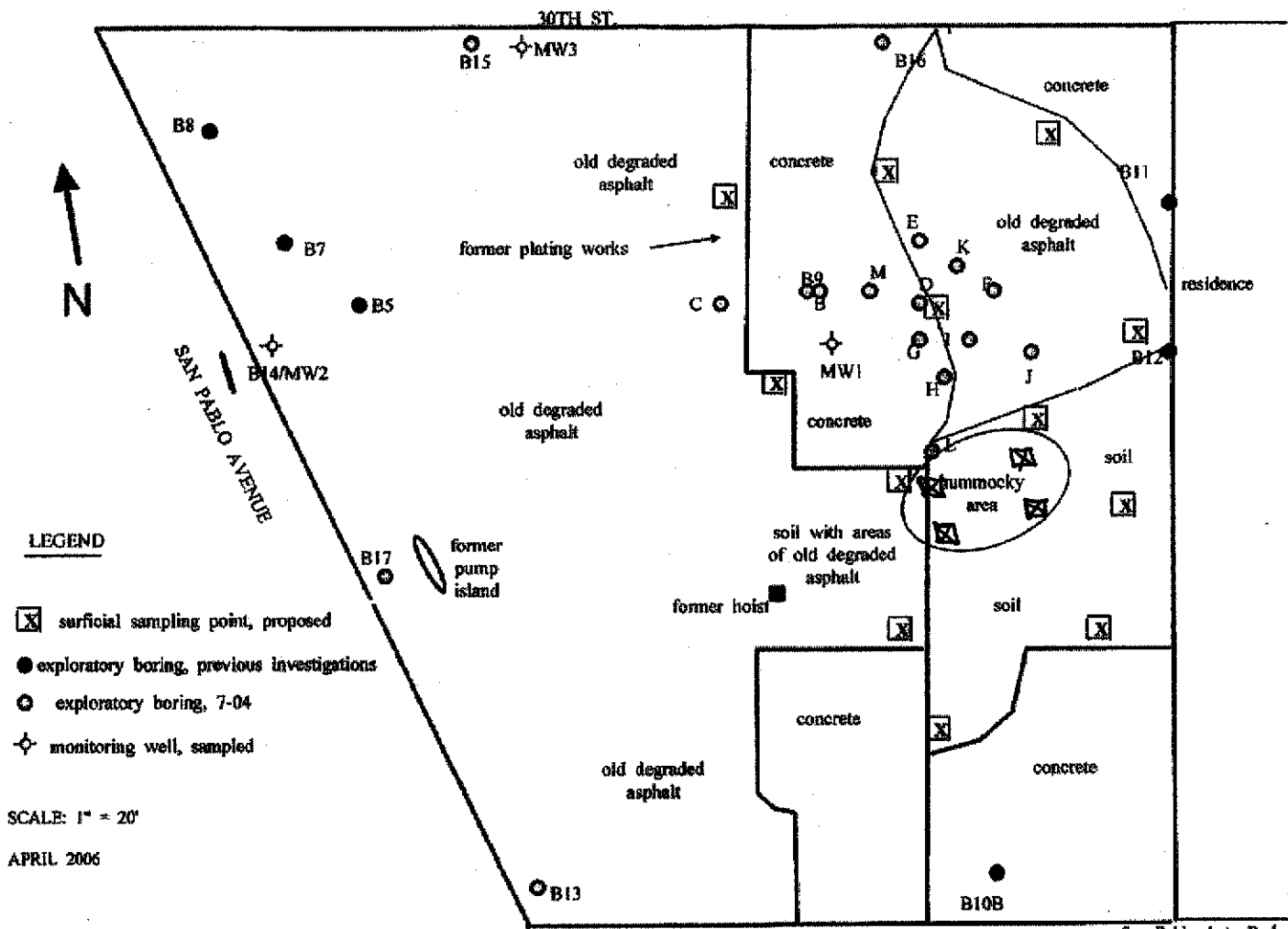
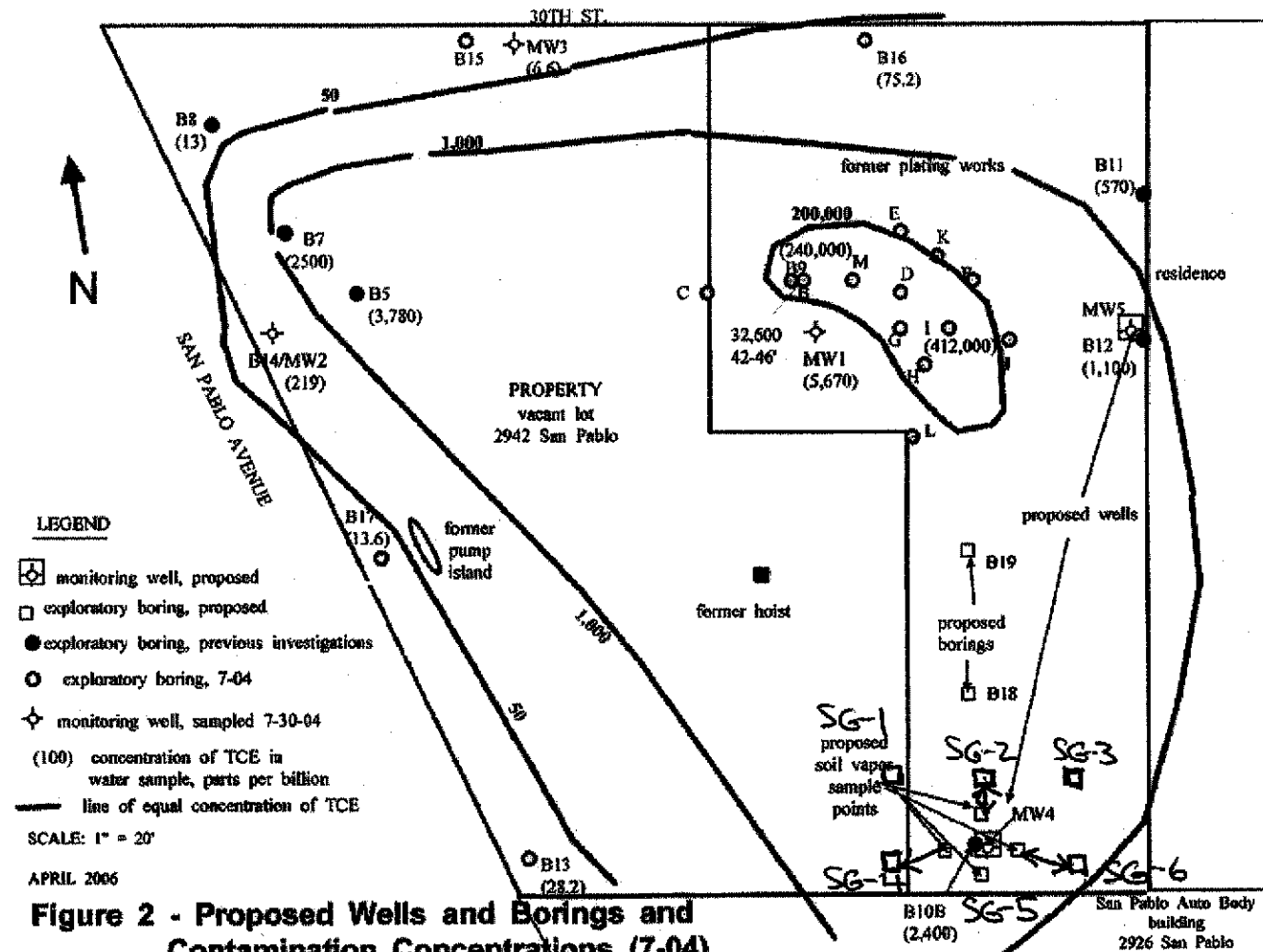


Figure 4 - Proposed Surficial Sample Points - Metals

San Pablo Auto Body building
2926 San Pablo

Requested Surficial Soil Sampling Locations



Requested Soil Vapor Sampling Locations

PROFESSIONAL CERTIFICATION & 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.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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 Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Joel Greger
PIERS Environmental Services, Inc.
1330 S. Bascom Avenue, Suite F
San Jose, CA 95128

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
04-10-06

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

April 7, 2006

Mr. James Chung
San Pablo Auto Body
2926 San Pablo Avenue
Oakland, CA 94608

Subject: SLIC Case RO0002567, Chung Property, 2942 San Pablo Avenue, Oakland, CA – Work Plan Review

Dear Mr. Chung:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site and the document entitled, "Work Plan for Additional Site Characterization and Report of Well Survey," dated March 27, 2006. The Work Plan proposes a scope of work to advance two soil borings and install two groundwater monitoring wells. We request that you address the technical comments below prior to conducting the field investigation. Based on the technical comments below, please submit the following items in a Work Plan Addendum or as part of a revised Work Plan:

- 1) Map of proposed soil vapor sampling locations in the area of boring B10B
- 2) Description of soil vapor sampling methods
- 3) Map of proposed soil sampling locations for metals and cyanide.

Please submit these items to ACEH for approval prior to implementing the field investigation.

TECHNICAL COMMENTS

1. **Source Area Remediation and Soil Vapor Sampling.** The Work Plan suggests that further delineation using soil vapor sampling is not warranted in the source area since excavation of the source area is proposed, and that soil vapor sampling to assess the risk of vapor intrusion should be completed during and after the excavation work. Based on the assumption that excavation will be conducted in the source area, we concur that soil vapor sampling to assess risk is not required until excavation is completed.
2. **Potential Source Area near Boring B10B.** The Work Plan proposes two soil borings located approximately 25 and 50 feet, respectively from previous boring B10B and one groundwater monitoring well adjacent to boring B10B to further delineate groundwater conditions and determine whether boring B10B represents a separate source. The proposed scope of work is not sufficient to assess whether a separate source exists in this area of the site. The Work Plan seems to argue that the soil results in boring B10B did not indicate a contaminant source in soil but also argues that the detection of 2,400 ppb of trichloroethene (TCE) in groundwater is not representative of groundwater flow conditions. These arguments seem to indicate that the TCE detected in boring B10B got there with no

local source or a groundwater migration pathway. We request that you submit plans to collect soil vapor samples in the area of boring B10B to evaluate whether a local source of VOCs exists in this area.

3. **Hydraulic Gradient and Monitoring Well Installation.** ACEH has no objection to the proposed installation of two additional monitoring wells at the proposed locations. Please present the results in the Corrective Action Plan requested below.
4. **Well Survey Results.** ACEH concurs with the proposal to review the file for a site at 958 East 28th Street and obtain additional information if available, regarding abandoned wells. Please present the results in the Corrective Action Plan requested below.
5. **Metals and Cyanide.** The proposal to collect composite soil samples to characterize the extent of metals and cyanide at the site may be acceptable. However, in order to evaluate whether the proposed soil sampling will adequately characterize the extent of metals and cyanide, we request that you submit a map showing the planned soil sampling locations, the areas covered by concrete, and any features within the concrete that could be conduits to the soil. Please submit the map in the Work Plan Addendum or revised Work Plan requested below.
6. **Groundwater Monitoring.** We concur with the proposed groundwater analyses for VOCs by EPA Method 8260 and analyses for metals, hexavalent chromium, and cyanide. However, we do not concur with discontinuation of sampling for total petroleum hydrocarbons as gasoline (TPHg). TPHg has been detected in all wells and has been detected at increasing concentrations in well MW-1. The most recent groundwater sample collected from well MW-1 on May 12, 2005 contained 7,610 µg/L of TPHg. We concur that analysis for BTEX using EPA Method 8020 is not required since these samples will be analyzed for VOCs including BTEX using EPA Method 8260. Please present the results in the Groundwater Monitoring Reports requested below.

TECHNICAL REPORT REQUEST

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

- **May 12, 2006** – Work Plan Addendum or Revised Work Plan
- **August 15, 2006** - Groundwater Monitoring Report for Second Quarter
- **Within 120 days following approval of Work Plan by ACEH** - Corrective Action Plan

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

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In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

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.

PROFESSIONAL CERTIFICATION & 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.

Mr. James Chung
April 7, 2006
Page 4

UNDERGROUND STORAGE TANK CLEANUP FUND

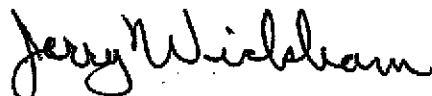
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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 Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Joel Greger
PIERS Environmental Services, Inc.
1330 S. Bascom Avenue, Suite F
San Jose, CA 95128

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



*Out
02-09-06*

ENVIRONMENTAL HEALTH SERVICES
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1131 Harbor Bay Parkway, Suite 250
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FAX (510) 337-9335

February 8, 2006

Mr. James Chung
San Pablo Auto Body
2926 San Pablo Avenue
Oakland, CA 94608

Subject: SLIC Case RO0002567, Chung Property, 2926 and 2942 San Pablo Avenue, Oakland, CA

Dear Mr. Chung:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site, including the reports entitled, "Site Characterization Report," dated August 31, 2004 and "Report of May 2005 Groundwater Sampling," dated June 3, 2005. Both reports were prepared on your behalf by PIERS Environmental Services, Inc. The "Site Characterization Report," presents the results of a soil and groundwater investigation that included exploratory borings, soil and grab groundwater sampling, and installation of three monitoring wells at the site. The investigation found elevated concentrations of volatile organic compounds (VOCs); primarily trichloroethene (TCE) in soil and groundwater in the area of a former metal works in the central portion of the site. Up to 92 milligrams per kilogram (mg/kg) of TCE were detected in shallow soil at the site. Up to 412,00 micrograms per liter ($\mu\text{g/L}$) of TCE were detected in groundwater at the site. The "Site Characterization Report," concluded that TCE in the area of the former plating works represents a source area that will continue to contribute to dissolved concentrations in groundwater until the source is remediated and the surface is paved.

Based on discussions during our meeting conducted on February 1, 2006, the area of the former plating works is currently vacant, but plans for the site include the construction of an oil change and car wash facility in this area of the site. The elevated concentrations of VOCs may pose a risk to human health through the indoor air vapor intrusion pathway. Further assessment of the potential for indoor air vapor intrusion is required as discussed in technical comment 1 below. We also request that you evaluate whether the apparent hydraulic gradient for the site is accurate and whether the three monitoring wells at the site adequately monitor plume migration. As discussed in technical comment 7 below, cleanup of the TCE source area(s) will be required to prevent continued release of TCE to groundwater in the area of the site.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Potential Risks from Vapor Intrusion.** The elevated concentrations of TCE detected in soil and groundwater at the site may pose a risk to human health through the indoor air

- vapor intrusion pathway. Further assessment of the potential for indoor vapor intrusion is required. The use of soil gas sampling is to be considered to more directly assess potential vapor intrusion risks. In addition, soil gas sampling will help to define the extent of the source area in the area of boring B-9 and whether an additional TCE source area is present near boring B-10 in the southern portion of the site. We request that you present plans to further assess potential vapor intrusion risks and the extent of the source area(s) in the Work Plan requested below.
2. **Hydraulic Gradient and Plume Delineation.** The apparent hydraulic gradient for the site is to the west at 0.31 feet per foot based on water levels from the three monitoring wells at the site. An apparent hydraulic gradient of 0.31 feet per foot is significantly higher than typically observed in the types of soils that are present at the site. Please evaluate whether the apparent hydraulic gradient for the site is accurate. Please consider whether monitoring well MW-2 may be installed within a separate water-bearing layer than the other two monitoring wells. Please also review the consistency of the apparent hydraulic gradient with regional flow directions observed at other sites in the area and observed contaminant distribution. TCE was detected at a concentration of 2,400 µg/L in a grab groundwater sample collected from boring B10B, which is located south (crossgradient) of the source area near boring B-9. Please present your evaluation and plans to better define the hydraulic gradient in the Work Plan requested below.
 3. **Monitoring Well MW-2.** During the most recent groundwater sampling event, TCE was detected at a concentration of 210 µg/L in well MW-2, which is screened within an interval from 30 to 34 feet bgs. TCE was previously detected at significantly higher concentrations of 3,780 and 2,500 µg/L in grab groundwater samples collected at shallow depths from borings B-5 and B-7, respectively. Please evaluate whether groundwater monitoring is needed within shallow groundwater as well as the deeper intervals currently monitored by the three existing wells. Present plans for monitoring well installation in the Work Plan requested below.
 4. **Groundwater Monitoring.** Based upon the assessment of hydraulic gradient, plume delineation, and groundwater monitoring wells requested in technical comments 2 and 3, please propose a groundwater monitoring program in the Work Plan requested below.
 5. **Detailed Well Survey.** In order to identify potential receptors for the TCE plume from your site, we request that you locate all wells (monitoring and production wells: active, inactive, standby, decommissioned, abandoned and dewatering, drainage and cathodic protection wells) within ½ mile 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. Please provide a table that includes the well designation, location, total depth, diameter, screen interval, date of well installation, current status, historic use, and owner of the wells. In addition, please provide well logs and completion records for wells downgradient from the site that are potential receptors. Please present your results in the Work Plan requested below.
 6. **Metals and Cyanide.** Only two soil samples (B-9 and B-10 at 1.5 feet bgs) have been analyzed for metals and cyanide. Given the large area over which the former plating works

potentially extended and the unknown nature of the plating operations, additional soil sampling for metals and cyanide is required. In addition, analyses for metals, including hexavalent chromium, and cyanide in groundwater will be required. Please present your plans for characterizing metals and cyanide in the Work Plan requested below.

7. **Source Area Remediation.** Cleanup of TCE in soil and groundwater within the source area will be required to prevent continued release of TCE to groundwater in the area of the site. Following assessment of potential risks from indoor air vapor intrusion and any other relevant exposure pathways, remedial alternatives are to be evaluated and the proposed cleanup alternative presented in the Corrective Action Plan requested below.

TECHNICAL REPORT REQUEST

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

- **April 15, 2006 – Work Plan**
- **Within 120 days following approval of Work Plan by ACEH - Corrective Action Plan**

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

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Mr. James Chung
February 8, 2006
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UNDERGROUND STORAGE TANK CLEANUP FUND

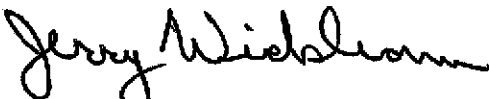
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Sincerely,



Jerry Wickham
Hazardous Materials Specialist

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February 8, 2006
Page 5

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1330 S. Bascom Avenue, Suite F, San Jose, CA 95128

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
11-15-05

November 10, 2005

Mr. James Chung
San Pablo Auto Body
2926 San Pablo Avenue
Oakland, CA 94608

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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Subject: SLIC Case RO0002567, Chung Property, 2926 San Pablo Avenue, Oakland, CA

Dear Mr. Chung:

Due to the type of release that has occurred at the above-referenced site, regulatory oversight for this case will take place under the Spills, Leaks, Investigations, and Cleanups (SLIC) program rather than the Local Oversight Program for fuel releases from underground storage tanks. In order for ACEH to review reports for your site under the SLIC program, we would require an oversight account for the above-referenced site. To set up your account, please send a check in the amount of \$6,000.00 payable to Alameda County Environmental Health. Please send your check to the attention of our Finance Department.

This initial deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project is being debited at the Ordinance specified rate, currently \$166.00 per hour.

Please write "SLIC" (the type of project), the site address, and the AR# 0315301 on your check.

If you have any questions, please contact Jerry Wickham at (510) 567-6791.

Sincerely,

Ariu Levi
Division Chief

cc: D. Drogos, J. Jacobs, Jerry Wickham

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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March 31, 2004

Mr. James Chung
San Pablo Auto Body
2926 San Pablo Ave.
Oakland, CA 94608

Dear Mr. Chung:

Subject: Fuel Leak Case RO0002567, 2926-2942 San Pablo Ave., Oakland, CA 94608

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the referenced site including the following Piers Environmental Services reports:

- May 2003, Phase I Environmental Site Assessment Report and Limited Phase II Investigation for 2926-2942 San Pablo Ave., Oakland, California
- September 9, 2003, Report of Additional Phase II Investigation, 2942 San Pablo Ave., Oakland, CA
- October 3, 2003, Report of Additional Phase II Investigation, 2942 San Pablo Avenue, Oakland, CA
- March 18, 2004, Work Plan for Site Characterization, 2926-2942 San Pablo Ave., Oakland, CA

We request that you address the following technical comments prior to performing the proposed work and submit the technical reports requested below.

TECHNICAL COMMENTS

1. A Globe Soil Engineers report dated November 19, 199 has been referenced in these reports. Do you have a copy of this report which you can submit our office?
2. The reports appear to be missing boring logs for borings B5, B6, B10B, B11 and B12. Please provide copies of these boring logs. Future cross sectional diagrams should include new and these older boring log results.
3. Although the presence of the halogenated volatile organic compound (HVOC), trichloroethene (TCE), is significant, both petroleum and VOC compounds will need to be investigated and understood. Soil and groundwater analysis of these compounds will be required in the discrete samples proposed for collection. In addition, the ether oxygenates, MTBE, TAME, ETBE, DIPE and TBA and the lead scavenger compounds, EDB and EDC should be analyzed in those samples nearest the petroleum release. Their analyses can be waived once their absence is confirmed. EPA Method 8260 should be used for their analysis.

4. The hydraulic hoist identified on your site should be removed. Although the hoist is not considered an underground tank and is therefore exempt from their regulations, sampling is recommended beneath the hoist for confirmation should residential or other conservative use of the property ever be considered.
5. Table 1C referenced in the March 18, 2004 work plan was not included in the submitted report, however, this table was found in the September 9, 2003 Phase II report. Table 1C includes metals analysis from borings B9 and B10. The Piers report notes that metals concentrations did not exceed any ESLs (Environmental Screening Levels) with the exception of chromium, detected at 63.6 ppm. It further states that the metals concentrations fall within background levels referenced in a Bradford, 1966 publication. Please be aware that the more recent publication, June 2002 LBNL Analysis of Background Distributions of Metals in Soil at LBL is a source referenced by the Water Board for this information. Since ESLs are referenced in this report, the metals analytical results table should include the appropriate ESLs for the metals analyzed.
6. The work plan has several components. The first component proposes the vertical delineation of VOCs in groundwater and the determination of subsurface lithology near boring B-9. This will be done using the membrane interface probe (MIP) attached to the Geoprobe drill rig. The MIP allows VOCs to be swept into a carrier gas and then be transferred to a detector such as the photoionization detector (PID). However, this detector is non-specific and cannot identify the compound(s) being sampled. Conductivity readings from the probe will also allow the characterization of the soil types encountered in the boring. The vertical extent of the VOC contamination in soils (both above and below groundwater) will be estimated until the contamination has been delineated. A Geoprobe boring will be advanced near the MIP boring and soil and groundwater samples collected as determined from the MIP boring results. Locations where contamination or groundwater is suspected will be targeted for sampling. Because the detector is not specific and because the extent of petroleum and HVOCs has not been defined, we request you analyze samples for TPHg, BTEX, oxygenates and lead scavengers and halogenated VOCs. EPA Method 8260 is recommended rather than EPA 8010. Since boring B-9 was only sampled at 1.5', it is recommended that subsequent shallow soil samples (0-10' depth) be collected and analyzed. As mentioned in the work plan, your consultant must take precautions to minimize the potential for cross-contamination of lower water-bearing zones since the boring will be drilled to an estimated depth of 60 feet.

The second component of the work plan calls for the identification and vertical delineation of VOCs near boring B-9. Because elevated levels of TCE in groundwater were detected from B-9 it is believed that the source of this contamination lies near this location. This is believed in spite of the fact that the shallow soil sample collected from B-9 at 1.5' detected only 0.065 ppm TCE. The additional shallow samples (previously recommended by our office) may confirm a source of soil contamination. Because this

March 31, 2004
Mr. James Chung
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2924-2942 San Pablo Ave., Oakland, CA
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boring is a "hot" spot, our office approves the four borings proposed around boring B-9, as an attempt to locate and delineate a HVOC source. This information will be vital when evaluating excavation as a remedial choice.

A third component of the work plan proposes three additional borings, B13-B15, along the assumed down-gradient property boundaries for further vertical and lateral delineation of VOCs in groundwater. The MIP system will again be used to screen soils to a depth of approximately 45'. Soil and groundwater samples should be tested for all analytes, TPHg, BTEX, oxygenates, lead scavengers and HVOCs. To define the up and down-gradient extent of the plumes, we recommend additional borings to the north and south of the site. Locations within the San Pablo Auto Body shop should be considered.

The last component of the work plan proposes the lateral delineation of first encountered groundwater off-site with borings B16-B-18. Our office does not concur with this recommendation at this time. Site-specific gradient should be determined using permanent on-site monitoring wells prior to performing any off-site investigation. In addition, when off-site investigation is appropriate a closer array of sampling points will be required. All locations of potential impact as well all groundwater zones potentially impacted will also need to be investigated.

TECHNICAL REPORT REQUEST

April 30, 2004- Written response to above technical comments and work plan addendum.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, D. Drogos

Mr. Joel Greger, Piers Environmental, 1330 S. Bascom Ave., Suite F, San Jose,
CA 95128

Mr. Bill Brown, DTSC, 700 Heinz Ave., Suite 200, Berkeley, CA 94710-2721

Wp2924-2942SanPabloAve

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



07-08-03

July 2, 2003

Mr. C.M. and Mrs. J.H. Chung
2926 San Pablo Ave.
Oakland, CA 94608

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

Dear Mr. and Mrs. Chung:

Subject: Fuel Leak Case No. RO0002567, 2926-2942 San Pablo Ave.,
Oakland, CA 94608

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS:

This letter is to inform you of new legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, Mr. C. M. and Mrs. J. H. Chung have been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change. In addition, our office is considering your request for site closure. Please also complete and submit a "notice of proposed action submitted to local agency" form. You may use sample letter 3, enclosed.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.

LANDOWNER NOTIFICATION

RO0002567, 2926-2942 San Pablo Ave., Oakland, 94608

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In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

You may use the enclosed "notice of proposed action" form (sample letter 3) as a template to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

Please call me at (510) 567-6765 should you have any questions about the content of this letter.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Attachments

cc: Betty Graham, RWQCB

SAMPLE LETTER (2): LIST OF LANDOWNERS FORM

Name of local agency
Street address
City

SUBJECT: CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR (*Site Name and Address*)

(Note: Fill out item 1 if there are multiple site landowners. If you are the sole site landowner, skip item 1 and fill out item 2.)

1. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (*name of primary responsible party*), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:

2. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (*name of primary responsible party*), certify that I am the sole landowner for the above site.

Sincerely,

Signature of primary responsible party

Name of primary responsible party

SAMPLE LETTER 3: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY

Name of local agency
Street address
City

SUBJECT: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY
FOR *(Site Name and Address)*

In accordance with section 25297,15(a) of Chapter 6.7 of the Health & Safety Code, I, *(name of primary responsible party)*, certify that I have notified all responsible landowners of the enclosed proposed action. Check space for applicable proposed action(s):

- cleanup proposal (corrective action plan)
- site closure proposal
- local agency intention to make a determination that no further action is required
- local agency intention to issue a closure letter

Sincerely,

Signature of primary responsible party

Name of primary responsible party

cc: Names and addresses of all record fee title owners