



SENT
03-23-06

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

March 22, 2006

Mr. Aziz Kandahari
5196 Grayhawk Lane
Dublin, CA 94568

**Re: Fuel Leak Case #RO000023, Environmental Investigation at EZ Serve
525 West A Street, Alameda, CA**

Dear Mr. Kandahari:

Alameda County Environmental Health (ACEH) staff has recently reviewed the Workplan report dated March 17, 2006, prepared by Ms. Deborah Shulman of Delta Environmental Consultants, Inc. As you are aware, this workplan has been submitted regarding a request to relocate a well (MW-2), due to the proposed construction activities at the above referenced site. There are also two additional wells, which are being proposed for installation along with MW-2A. The proposed workplan is approved. However we request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

This workplan was submitted to our office subsequent to our meeting and discussions with Mr. Kandahari. Please ensure the following items are addressed as specified below:

- Geotracker EDF Submittals - A review of the case file and the State Water Resources Control Board's (SWRCB) Geotracker website indicate that electronic copies of analytical data have not been submitted for your site. Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all analytical data (collected on or after September 1, 2001), to the SWRCB's Geotracker database website in accordance with the above-cited regulation. Please perform the electronic submittals for applicable data and submit verification to this Agency by 3/14/2006.

TECHNICAL REPORT REQUEST

Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

April 22, 2006 SWI Report

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to 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 Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

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.

UNDERGROUND STORAGE TANK CLEANUP FUND

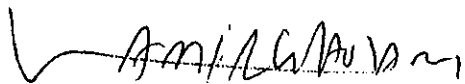
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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) 567-6876.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Deborah Shulman, Delta Environmental Consultants, Inc. 3164 Gold Camp Drive,
Suite 200, Rancho Cordova, CA 95670
A. Gholami, D. Drogos

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



2023

STID 3580

October 24, 2002

Mr. Andrew Long
Restructure Petroleum Marketing Services, RPMS
205 South Hoover Blvd. Suite 101
Tampa Florida 33609

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

RE: Former EZ Serve Site at 525 West A Street, Hayward, CA

Dear Mr. Long:

I have received and reviewed the "Risk Based Corrective Action Report" dated September 5, 2002, "Remediation Well Installation Report" dated August 14, 2002, and "Corrective Action Plan" dated September 4, 2002 by Mr. Bryan Hill of ATC Associate Inc. concerning the above referenced site. As you are aware the "Risk Assessment" was performed to evaluate risk and establish clean up level for the contaminants, "Remediation Well Installation" was performed during feasibility studies, and the "Corrective Action Plan" was submitted to address the contamination based on the result of the studies.

Per my discussion with Mr. Hill of ATC Associate Inc., I generally concur with this workplan proposal and the excavation and use of ORC as a way to further reduce the source and promote degradation of the plume at the above referenced site. Additionally you may replace the MW-1, MW-3 through MW-6, and VEAS-1 wells with MW-15 through MW-19 due to loss of the aforementioned wells during the excavation activities. However, you should locate MW-15 about 10 feet down gradient of the source area around MW-3 outside of back fill area. Additionally grab soil and groundwater must be collected in order to further define the plume once the excavation activities are completed.

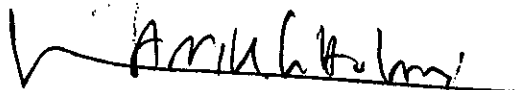
Furthermore, you should continue with the quarterly monitoring as specified within above reports.

Please be advised that this office will respond to the clean up level calculations and risk assessment after consultation with Regional Water Quality Control Board staff.

Please give me advance notice regarding your sampling schedule, so that I could be present during the sampling event.

Should you have any questions, please call me at (510) 567-6876.

Sincerely,

A handwritten signature in black ink, appearing to read "Amir K. Gholami". The signature is written in a cursive style and is positioned above a horizontal line.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Bryan Hill, ATC Associates Inc. 9620 Chesapeake Drive, Suite 203, San Diego,
CA 92123
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



10-31-02

STID 3580

October 24, 2002

Mr. Andrew Long
Restructure Petroleum Marketing Services, RPMS
205 South Hoover Blvd. Suite 101
Tampa Florida 33609

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

RE: Former EZ Serve Site at 525 West A Street, Hayward, CA

Dear Mr. Long:

I have received and reviewed the "Risk Based Corrective Action Report" dated September 5, 2002, "Remediation Well Installation Report" dated August 14, 2002, and "Corrective Action Plan" dated September 4, 2002 by Mr. Bryan Hill of ATC Associate Inc. concerning the above referenced site. As you are aware the "Risk Assessment" was performed to evaluate risk and establish clean up level for the contaminants, "Remediation Well Installation" was performed during feasibility studies, and the "Corrective Action Plan" was submitted to address the contamination based on the result of the studies.

Per my discussion with Mr. Hill of ATC Associate Inc., I generally concur with this workplan proposal and the excavation and use of ORC as a way to further reduce the source and promote degradation of the plume at the above referenced site. Additionally you may replace the MW-1, MW-3 through MW-6, and VEAS-1 wells with MW-15 through MW-19 due to loss of the aforementioned wells during the excavation activities. However, you should locate MW-15 about 10 feet down gradient of the source area around MW-3 outside of back fill area. Additionally grab soil and groundwater must be collected in order to further define the plume once the excavation activities are completed.

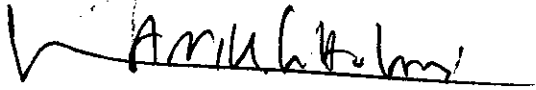
Furthermore, you should continue with the quarterly monitoring as specified within above reports.

Please be advised that this office will respond to the clean up level calculations and risk assessment after consultation with Regional Water Quality Control Board staff.

Please give me advance notice regarding your sampling schedule, so that I could be present during the sampling event.

Should you have any questions, please call me at (510) 567-6876.

Sincerely,

A handwritten signature in black ink, appearing to read "Amir K. Gholami", written over a horizontal line.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Bryan Hill, ATC Associates Inc. 9620 Chesapeake Drive, Suite 203, San Diego,
CA 92123
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



04-10-02

2023

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

STID 3580

March 13, 2002

Mr. Andrew Long
Restructure Petroleum Marketing Services, RPMS
205 South Hoover Blvd. Suite 101
Tampa Florida 33609

RE: Former EZ Serve Site at 525 West A Street, Hayward, CA

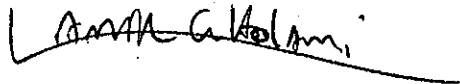
Dear Mr. Long:

I have received and reviewed "Quarterly Groundwater Monitoring Report", dated December 28 2001 submitted by Mr. Greg Vogelpohl of ATC Associates Inc. regarding the above referenced site. Please note the following comments:

- Per this report, MW-2, MW-4, MW-1 and MW-1A wells revealed the highest concentrations of the pollutants. The highest TPH was noted at MW-1A well at 21,000ppb followed by MW-2 at 20,000ppb. The highest Benzene concentrations were noted at 1000ppb within MW-1 and 880ppb in MW-2 well. The highest concentration of MTBE was detected within MW-4 at 27ppb. There are obviously some oscillations in the concentrations of some of these constituents as noted by the laboratory results.
- Per my discussion with Mr. Vogelpohl of ATC associate, performance of pilot studies have been recommended to determine the most appropriate remediation alternative including installment of vapor extraction/air sparge wells and groundwater extraction wells. Furthermore 8-hour vapor extraction pilot test, 8-hour air sparge test, and 24-hour constant rate discharge aquifer tests will be performed and incorporated in an Interim Remedial Action, IRA, plan.
- Additionally, a risk assessment is to be performed in order to establish clean up level and to submit the risk assessment along with results of the previously approved workplan regarding the above referenced site. As you are aware, the risk assessment had been requested by Madhulla Logan, formerly of our office, as an addendum to the previously submitted risk assessment dated May 9th, 1995 by Brown and Caldwell Consultants. However, per my discussion with Mr. Vogelpohl of ATC Associates Inc. However, per my discussion with Mr. Vogelpohl, you may postpone preparation of the risk assessment till the concentrations of the constituents in the plume have reduced significantly in future.
- Per figure 2 within this report, groundwater flow gradient is to the southwest at 0.007 ft/ft and to the northeast at 0.003 ft/ft. Depth to groundwater was estimated at about 15.81 to 17.91 ft.

Should you have any questions, please call me at (510) 567-6876.

Sincerely,

A handwritten signature in black ink that reads "Amir K. Gholami". The signature is written in a cursive style and is underlined with a single horizontal line.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Greg Vogelwohl, ATC Associates Inc. 9620 Chesapeake Drive, Suite 203, San Diego,
CA 92123
Mr. Hugh Murphy, City of Hayward Hazardous Material Office, 777 B Street, Hayward, CA
94541
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



03-14-02

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

STID 3580

March 13, 2002

Mr. Andrew Long
Restructure Petroleum Marketing Services, RPMS
205 South Hoover Blvd. Suite 101
Tampa Florida 33609

RE: Former EZ Serve Site at 525 West A Street, Hayward, CA


Dear Mr. Long:

I have received and reviewed "Quarterly Groundwater Monitoring Report", dated December 28 2001 submitted by Mr. Greg Vogelpohl of ATC Associates Inc. regarding the above referenced site. Please note the following comments:

- Per this report, MW-2, MW-4, MW-1 and MW-1A wells revealed the highest concentrations of the pollutants. The highest TPH was noted at MW-1A well at 21,000ppb followed by MW-2 at 20,000ppb. The highest Benzene concentrations were noted at 1000ppb within MW-1 and 880ppb in MW-2 well. The highest concentration of MTBE was detected within MW-4 at 27ppb. There are obviously some oscillations in the concentrations of some of these constituents as noted by the laboratory results.
- Per my discussion with Mr. Vogelpohl of ATC associate, performance of pilot studies have been recommended to determine the most appropriate remediation alternative including installment of vapor extraction/air sparge wells and groundwater extraction wells. Furthermore 8-hour vapor extraction pilot test, 8-hour air sparge test, and 24-hour constant rate discharge aquifer tests will be performed and incorporated in an Interim Remedial Action, IRA, plan.
- Additionally, a risk assessment is to be performed in order to establish clean up level and to submit the risk assessment along with results of the previously approved workplan regarding the above referenced site. As you are aware, the risk assessment had been requested by Madhulla Logan, formerly of our office, as an addendum to the previously submitted risk assessment dated May 9th, 1995 by Brown and Caldwell Consultants. However, per my discussion with Mr. Vogelpohl of ATC Associates Inc. However, per my discussion with Mr. Vogelpohl, you may postpone preparation of the risk assessment till the concentrations of the constituents in the plume have reduced significantly in future.
- Per figure 2 within this report, groundwater flow gradient is to the southwest at 0.007 ft/ft and to the northeast at 0.003 ft/ft. Depth to groundwater was estimated at about 15.81 to 17.91 ft.

Should you have any questions, please call me at (510) 567-6876.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amir K. Gholami', with a long horizontal stroke extending to the right.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Heidi Bauer, Clear water Group Inc., 520 Third Street 3104
Oakland
Mr. Hugh Murphy, City of Hayward Hazardous Material Office, 777 B Street, Hayward, CA
94541
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



11-9-01

R023

STID 3580

October 24, 2001

Mr. Andrew Long
Restructure Petroleum Marketing Services, RPMS
205 South Hoover Blvd. Suite 101
Tampa Florida 33609

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

RE: Former EZ Serve Site at 525 West A Street, Hayward, CA

Dear Mr. Long:

I am in receipt of faxed copy of "Project Status" document dated October 23, 2001 submitted by Mr. Greg Vogelpohl of ATC Associates Inc. regarding the above referenced site. I understand that Ms. Bauer of Clearwater Group Inc. is no longer involved at the above referenced site.

According to my earlier discussion with Mr. Vogelpohl conversation and per previous report MW-2, MW-4, MW-1 and MW-1A wells are the most contaminated wells at the site during this investigation. The highest TPH was noted at MW-1A well at 27,000ppb followed by MW-2 at 18,000ppb. The highest Benzene concentrations were noted at 860ppb within MW-2 and 690ppb in MW-4 well. MTBE was not detected within any of the wells during this analysis.

Per this report and my discussion with Mr. Vogelpohl of ATC associate, performance of pilot studies have been recommended to determine the most appropriate remediation alternative including installment of vapor extraction/air sparge wells and groundwater extraction wells. Furthermore 8-hour vapor extraction pilot test, 8-hour air sparge test, and 24-hour constant rate discharge aquifer tests will be performed and incorporated in an Interim Remedial Action, IRA, plan.

In the past I had asked that a risk assessment be performed in order to establish clean up level and to submit the risk assessment along with results of the previously approved workplan regarding the above referenced site. The risk assessment had been requested since Madhulla Logan, formerly of our office, had requested such addendum to the previously submitted risk assessment dated May 9th, 1995 by Brown and Caldwell Consultants. However, per my discussion with Mr. Vogelpohl of ATC Associates Inc. you do not need to prepare this risk assessment at this time but rather when the concentrations of the constituents in the plume have reduced significantly in the near future.

Additionally, I understand that all the generated waste on the site will be properly handled in accordance to this office and Alameda County fire Department guidelines. This includes proper handling of the previously generated waste, three 55-gallon drums, at the above referenced site.

Please inform me in advance regarding your fieldwork schedule, so that a representative of this office could be present during the field work events.

If you have any questions, please do not hesitate to call me at (510) 567-6876.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'V' shape followed by a long horizontal line.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Heidi Bauer, Clear water Group Inc., 520 third Street 3104
Oakland
Mr. Hugh Murphy, City of Hayward Hazardous Material Office, 777 B Street, Hayward, CA
94541
Files



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

STID 3580

October 24, 2001

Mr. Andrew Long
Restructure Petroleum Marketing Services, RPMS
205 South Hoover Blvd. Suite 101
Tampa Florida 33609

RE: Former EZ Serve Site at 525 West A Street, Hayward, CA

Dear Mr. Long:

I am in receipt of faxed copy of "Project Status" document dated October 23, 2001 submitted by Mr. Greg Vogelpohl of ATC Associates Inc. regarding the above referenced site. I understand that Ms. Bauer of Clearwater Group Inc. is no longer involved at the above referenced site.

According to my earlier discussion with Mr. Vogelpohl conversation and per previous report MW-2, MW-4, MW-1 and MW-1A wells are the most contaminated wells at the site during this investigation. The highest TPH was noted at MW-1A well at 27,000ppb followed by MW-2 at 18,000ppb. The highest Benzene concentrations were noted at 860ppb within MW-2 and 690ppb in MW-4 well. MTBE was not detected within any of the wells during this analysis.

Per this report and my discussion with Mr. Vogelpohl of ATC associate, performance of pilot studies have been recommended to determine the most appropriate remediation alternative including installment of vapor extraction/air sparge wells and groundwater extraction wells. Furthermore 8-hour vapor extraction pilot test, 8-hour air sparge test, and 24-hour constant rate discharge aquifer tests will be performed and incorporated in an Interim Remedial Action, IRA, plan.

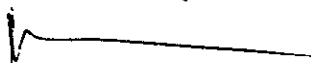
In the past I had asked that a risk assessment be performed in order to establish clean up level and to submit the risk assessment along with results of the previously approved workplan regarding the above referenced site. The risk assessment had been requested since Madhulla Logan, formerly of our office, had requested such addendum to the previously submitted risk assessment dated May 9th, 1995 by Brown and Caldwell Consultants. However, per my discussion with Mr. Vogelpohl of ATC Associates Inc. you do not need to prepare this risk assessment at this time but rather when the concentrations of the constituents in the plume have reduced significantly in the near future.

Additionally, I understand that all the generated waste on the site will be properly handled in accordance to this office and Alameda County fire Department guidelines. This includes proper handling of the previously generated waste, three 55-gallon drums, at the above referenced site.

Please inform me in advance regarding your fieldwork schedule, so that a representative of this office could be present during the field work events.

If you have any questions, please do not hesitate to call me at (510) 567-6876.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Heidi Bauer, Clear water Group Inc., 520 third Street 3104
Oakland
Mr. Hugh Murphy, City of Hayward Hazardous Material Office, 777 B Street, Hayward, CA
94541
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



8-23-01

2023

STID 3580

August 22, 2001

Mr. Andrew Long
Restructure Petroleum Marketing Services, RPMS
205 South Hoover Blvd. Suite 101
Tampa Florida 33609

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

RE: Former EZ Serve Site at 525 West A Street, Hayward, CA

Dear Mr. Long:

This office is in receipt of "Second Quarter 2001 Groundwater Sampling Event" dated August 20, 2001 regarding the above referenced site by Ms. Heidi M. Bauer of Clearwater Group Inc., your consultant.

Per this report MW-2, MW-4, MW-1 and MW-1A wells are the most contaminated wells at the site during this investigation. The highest TPH was noted at MW-1A well at 27,000ppb followed by MW-2 at 18,000ppb. The highest Benzene concentrations were noted at 860ppb within MW-2 and 690ppb in MW-4 well. MTBE was not detected within any of the wells during this analysis.

As you are aware, I have previously discussed this site with Ms. Bauer, who informed me regarding a risk assessment, which had been conferred with Madhulla Logan, formerly of our office. According to Ms. Bauer, Ms. Logan had requested some addendum to the previously submitted risk assessment dated May 9th, 1995 by Brown and Caldwell Consultants. The risk assessment was to be performed in order to establish clean up level for the above referenced site. Therefor, you may submit the risk assessment along with results of the previously approved workplan regarding the above referenced site.

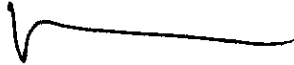
Please begin implementation of the submitted workplan as well as the risk assessment proposal as discussed previously.

Please give me advance notice regarding your sampling schedule, so that I could be present during the sampling event.

I will be looking forward to receive the result of the submitted workplan along with the risk assessment calculations.

Should you have any questions, please call me at (510) 567-6876.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Heidi Bauer, Clear water Group Inc., 520 third Street 3104
Oakland
Mr. Hugh Murphy, City of Hayward Hazardous Material Office, 777 B Street, Hayward, CA
94541
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



*Sent 1/26/00
Including cc's*

2023

Stid 3580

January 21, 2000

Mr. Andrew Long
Restructure Petroleum Marketing Services, RPMS
205 South Hoover Blvd. Suite 101
Tampa Florida 33609

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700
(510) 337-9432

RE: Former EZ Serve Site at 525 West A Street, Hayward, CA

Dear Mr. Long:

I am in receipt of the workplan dated January 29, 1999 by Ms. Heidi M. Bauer of Clearwater Group Inc., your consultant. Thank you for the submittal of the plan and addressing the issues raised by the county in the previous communications. I reviewed and generally concur with this workplan proposal.

Additionally, I discussed this site with Ms. Bauer, who informed me regarding a risk assessment, which had been discussed with Madhulla Logan, formerly of our office. According to Ms. Bauer, Ms. Logan had requested some addendum to the previously submitted risk assessment dated May 9th, 1995 by Brown and Caldwell Consultants.

Per our discussion, this risk assessment will be performed to establish clean up level for the above referenced site. However, please be advised that Ms. Logan is no longer working in this office, but she might start working for the county on a contract basis soon.

Therefor, I will submit the risk assessment portion of this work to Madhulla, once she begins working for this office again.

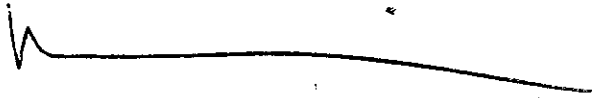
In the mean time you may begin implementation of the submitted workplan as well as the risk assessment proposal per approval by Madhulla Logan.

Please give me advance notice regarding your sampling schedule, so that I could be present during the sampling event.

I will be looking forward to receive the result of the submitted workplan.

If you have any questions, please call me at (510) 567-6876.

Sincerely,

A handwritten signature in black ink, starting with a stylized 'W' and ending with a long horizontal line that tapers to the right.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Heidi Bauer, Clear water Group Inc., 520 third Street 3104
Oakland
Files

Alameda County Health care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

"Notice of Proposed Action" form
(Sample Letter 3)

SUBJECT: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY FOR
(site name and address)
(to be filled in by the primary responsible party and mailed to
Alameda county)

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

Alameda County Health care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

"List of Landowners" form
(Sample Letter 2)

SUBJECT: CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR (Site
name and address)
(to be filled in by the primary responsible party and mailed to
Alameda County)

(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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Sent 12/13/99
Including cc's

D023

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700
(510) 337-9432

STID 3580

Ms. Margaret Thompson
1675 Manzanita Ave. #120
Chico, CA 95926

RE: Property at 525 West A Street, Hayward, CA 94541

Dear Ms. Thompson:

I sent you a letter regarding the landowner notification and participation requirements. I explained about the law and its requirements. Additionally I enclosed "Sample Letter 2" and "Sample Letter 3", which had to be properly filled out by you and submitted to our office. However, the Sample Letters were not properly filled out.

Enclosed please find the sample letters. Fill them out properly and resubmit to this office.

Please call me at (510)-567-6876, if you have any questions.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB

Attachments: Sample letter 2 and Sample letter 3, which must be filled out by the Responsible Party and mailed to Alameda County.

Alameda County Health care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

"List of Landowners" form
(Sample Letter 2)

SUBJECT: CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR (Site
name and address)
(to be filled in by the primary responsible party and mailed to
Alameda County)

(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

Alameda County Health care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

**"Notice of Proposed Action" form
(Sample Letter 3)**

**SUBJECT: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY FOR
(site name and address)
(to be filled in by the primary responsible party and mailed to
Alameda county)**

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 10-26-99
including acks

p023

October 25, 1999

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

STID 3580

Mr. Brian Cobb
EZ Serbe Petroleum Marketing
10700 N I-45, Suite 500
Houston, TX 77037-1187

Ms. Margaret Thompson
1675 Manzanita Ave. #120
Chico, CA 95926

RE: Property at 525 West A Street, Hayward, CA 94541

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Cobb and Ms. Thompson:

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, you 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.

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

Re: 525 West A Street, Hayward

October 25, 1999

Page 2 of 2

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) 567-6876 if you have any questions about the content of this letter.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB

Attachments: Sample letter 2 and Sample letter 3, which must be filled out by the Responsible Party and mailed to Alameda County.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R023

RAFAT A. SHAHID, Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Environmental Protection Division
1131 Harbor Bay Parkway, #250
Alameda, CA 94502-6577
(510) 567-6700

August 3, 1995

Mr. Brian Cobb
E-Z Serve Petroleum Marketing Company
2550 North Loop West, ST 600
Houston, Texas-77292-2021

Subject: E-Z Serve, 525 West A street, Hayward, California

Dear Mr. Cobb:

I have received a copy of the risk assessment document dated May 9, 1995, prepared by Brown and Caldwell for the above referenced property. This report has been reviewed by this Department and the following issues need to be resolved before acceptance of the risk assessment:

1. As per guidelines published by the Environmental Protection Agency (EPA) and the Department of Toxic Substances Control (DTSC), the age (duration) and body weight of a child is taken to be 6 yrs and 15 kg respectively.
2. The sampling data should be analyzed to determine if it follows a log normal or a normal distribution. This is important as the calculation for the 95% UCL of the average is different for both. Also if it happens to be log normal, then the non-detects would be calculated as detection limit/log of 2. This is given in the EPA reference "supplemental guidance to the RAGS: Calculating the concentration term".
3. Is reasonable maximum exposure same as 95% UCL of average?
4. Provide more detailed information on models used for indoor air volatilization pathway and consumption of homegrown produce. Give appropriate references for model, and the source/reference from which the exposure values were obtained. Also, include a rationale as to why a particular value was chosen. Eg: a value of 0.002 was used for the soil organic carbon coefficient but no source reference or a rationale has been given for using this value. If it is a site specific measured value, then please describe the procedure used for measurement.

Please submit the corrected risk assessment to this Department within 30 days of receiving this letter. If you have any questions, call me at (510) 567-6700.

Sincerely,

Madhulla Logan

Madhulla Logan,
Hazardous Material Specialist

CC: Todd Miller, Brown and Caldwell, 3480 Buskirk Avenue,
Pleasant Hill, CA - 94523-4342

8/30/94

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :)	Notice of Official Action
E-Z Serve Site)	By the San Francisco Bay
525 West "A" Street)	Regional Water Quality
Hayward, CA 94541)	Control Board

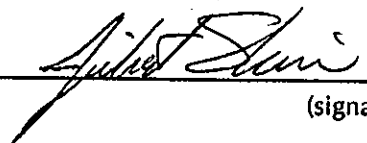
Dear Sirs:

The attached Official Notice of Request for Technical Reports pursuant to Water Code Section 13267(b) has been forwarded to this office for legal service, and oversight. As the Agency responsible for enforcing the terms of this Official Action, all communication should continue to be directed to this office. Please make arrangements to comply by calling me at (510) 567-6763 to coordinate all future activities.

Failure to comply could result in liability for civil or administrative penalties of up to \$1000 per day of delinquency.

I Juliet Shin, do hereby certify
that I served L.A. & Margaret Thompsen with a copy of the
attached Notice of Official Action by the Regional Board by
certified mailer # Z 773 036 315.

Dated: 8/30/94


(signature)

cc: Gil Jensen, Alameda County District Attorney's Office
files (omernik5)

Alameda County Health Care Services Agency, Department of
Environmental Health, Hazardous Materials Division

In Re The Property Known As :)	Notice of Official Action
E-Z Serve Site)	By the San Francisco Bay
525 West "A" Street)	Regional Water Quality
Hayward, CA 94541)	Control Board

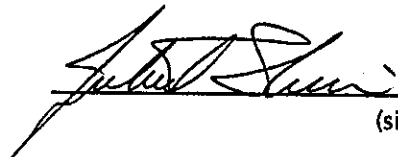
Dear Sirs:

The attached Official Notice of Request for Technical Reports pursuant to Water Code Section 13267(b) has been forwarded to this office for legal service, and oversight. As the Agency responsible for enforcing the terms of this Official Action, all communication should continue to be directed to this office. Please make arrangements to comply by calling me at (510) 567-6763 to coordinate all future activities.

Failure to comply could result in liability for civil or administrative penalties of up to \$1000 per day of delinquency.

I Juliet Shin, do hereby certify
that I served E-Z Serve Mgmt. Co. with a copy of the
attached Notice of Official Action by the Regional Board by
certified mailer # Z 773 036 316

Dated: 8/30/94


(signature)

cc: Gil Jensen, Alameda County District Attorney's Office
files (omemiks)

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, SUITE 800
OAKLAND, CA 94612
(510) 284-1255



Aug. 26, 1994

E-Z Serve Mgmt. Co.
(Contact: Brian Cobb)
P.O. Box 922021
Houston, Texas 77292-2021

L.A. & Margaret Thompsen
P.O. Box 16290
Houston Texas 77222

RE: Legal Request for Submittal of a Technical Report Resulting from the Alameda County Department of Environmental Health's Enforcement Panel Meeting of June 21, 1994.

Dear Sirs:

It has been brought to my attention by Regional Board staff that a condition of soil and ground water pollution exists on your property from an underground storage tank release. The Alameda County Department of Environmental Health (ACHD) staff have requested technical reports from you to fulfill your obligations per California Code of Regulations, Title 23, Waters, Chapter 16, Underground Storage Tank Regulations, Article 11, Corrective Action Requirements. It is my understanding that ACHD staff were unsuccessful in eliciting your co-operation in resolving these issues through normal correspondence.

A Pre-Enforcement Review Panel was held at the ACHD Offices on June 21, 1994, attended by Kevin Graves, of my staff. Information submitted at that meeting, and follow up submittals received pursuant to that meeting, have established that you are Responsible Parties pursuant to Section 13304 of the California Water Code. Therefore, pursuant to the Regional Board's authority under Section 13267(b) of the California Water Code, you are hereby required to submit a technical report to address soil and ground water pollution by October 4, 1994. The information provided at the hearing, and in follow up submittals, is inconclusive as to the legal responsibilities of Powerine Oil Company and Autotronic Systems, Inc. as Responsible Parties as of this date. The inclusion of Powerine Oil Company and Autotronic Systems, Inc. as Responsible Parties is therefore deferred. This action is without prejudice and should be taken neither as a finding of nonresponsibility or responsibility.

The technical report should specifically address the following numbered items:

- 1) A proposal to delineate the vertical and lateral extent and severity of soil and ground water contamination resulting from the site. Delineation of the plume must incorporate the installation of additional permanent monitoring wells, although hydropunches/temporary wells may be used as a screening tool;
- 2) A proposal to contain all of the ground water contaminant plume, both on and off site, from further migration;
- 3) A proposal to conduct a survey on streets adjacent to the site to determine whether utility lines are acting as a conduit for plume migration;
- 4) A proposal to conduct a survey for any nearby domestic/irrigation or industrial wells potentially impacted by the site or influencing the migration of the site's contaminant plume. Converse Environmental's June 30, 1988 report identified at least one domestic/irrigation well fairly close to the site (the exact location was not given);
- 5) A proposal to conduct a Risk Assessment to determine whether releases from the site are creating a potential human-health threat to neighboring sites. For example, the adjacent property to the north is occupied by residents of a trailer park. This office is concerned with potential vapor inhalation at the site, since the site is not paved;
- 6) There is information to indicate that contaminated excavated soil from the site was placed back into the excavation pits in 1990. The remediation of this soil must be addressed by the air sparging/vapor extraction remediation system, proposed and approved in March 1994. As stipulated in the County's March 25, 1994 letter, close attention shall be given to studying this remediation system, from the onset of its operation, to assure that the air sparging activity will not influence further plume migration off site. Quarterly status reports addressing the effectiveness of this remediation system shall be submitted to this office;
- 7) Following the delineation of soil and ground water contamination off site, a proposal to remediate the off-site contamination will be required. Additionally, if the proposed air sparging/ vapor extraction system does not effectively remediate soil and ground water contamination on site, another more effective remediation proposal will be required; and
- 8) A timetable for the above required work shall be included in the technical report.

Enforcement Panel Meeting
Page 3 of 3

All proposed work should adhere to the requirements articulated in The Tri-Regional Board Staff Recommendations for the Preliminary Evaluation and Investigation of Underground Storage Tank Sites - 8/10/90 and Article 11 of Title 23, Waters, California Code of Regulations.

I am hereby transmitting this request for a technical report to ACHD for service and continued case handling. You should be aware that failure on your part to submit the requested technical report, ~~or a submittal received after the date specified in this request~~ may result in fines up to \$1,000 per day of delinquency. Your response to this technical report request should be sent to Juliet Shin, at ACHD. Please inform Juliet Shin at least three working days in advance of all field activities.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the Alameda County Department of Environmental Health, Hazardous Materials Division.

If you have any questions regarding the contents of this letter, please contact Juliet Shin, of ACHD, at (510) 567-6763.

Sincerely,



Steven R. Ritchie
Executive Officer

cc: Gil Jensen, Alameda County District Attorney's Office,
Consumer & Environmental Protection Division.
Juliet Shin, Hazardous Materials Specialist, ACHD.
Jon K. Wactor, Luce, Forward, Hamilton & Scripps
100 Bush St., 20th Flr., S.F., CA 94104
Gretchen R. Stroud, Cooley Godward, Five Palo Alto Square,
4th Flr., Palo Alto, CA 94306-2155
Jonathan Redding, Fitzgerald, Abbott & Beardsley,
1221 Broadway, 21st Flr., Oakland, CA 94612-1837
Coralie Kupfer, Rodi, Pollock, Pettker, Galbraith & Phillips
801 South Grand Ave., Ste 400, Los Angeles, CA 90017

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R023

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

March 25, 1994

Mr. Brian Cobb
E-Z Serve Mgmt. Co.
P.O. Box 922021
Houston, Texas 77292-2021

STID 3580

Re: Investigations at 525 West "A" Street, Hayward, California

Dear Mr. Cobb,

This office has reviewed Hydro Environmental's Off-Site Survey letter report, dated March 11, 1994, and their Remedial Investigation Report, dated March 1, 1994. Based on the results of the vapor extraction pilot tests conducted on some of the on-site monitoring wells, Hydro Environmental has proposed to implement vapor extraction and air sparging to remediate some of the soil and ground water contamination resulting from the site.

This office is concerned that the vapor extraction system will create preferential air flow through the sand lenses noted at 10 to 15 feet and 25 to 30 feet below ground surface, thereby remediating soil contamination in the strands of sand lenses rather than in the more common, less permeable, silty clay units. However, per my conversation with John Turney, Hydro Environmental, on March 25, 1994, he stated that, to some degree, air flow through the sand lenses would create a concentration gradient and, therefore, diffusion of air flow into some of the silty clay units. Also, he added that if these remediation systems were not effective, that their ineffectiveness would be detected during additional tests to confirm the estimated capture zones. Mr. Turney stated that subsequent to employing the vapor extraction and air sparging systems for a period of time, confirmatory soil samples would eventually be collected to confirm that all units of soil were adequately remediated.

Lastly, in Hydro Environmental's letter report, they listed four potential off-site sources contributing to the observed off-site contamination: 411 West "A" St., 491 West "A" St., 504 West "A" St., and 691 West "A" St. The sites at 411 and 504 West "A" Street are within the jurisdiction of the Hayward Fire Department. Per my conversation with Hugh Murphy, Hayward Fire Department, 411 West "A" Street was recently "delisted", therefore, it appears that the site no longer poses a threat, and the site at 504 West "A" Street has never been opened as a case. The Hayward Fire Department and this office had no files on 491 or 691 West "A" Street.

Mr. Brian Cobb
Re: 525 West "A" St.
March 25, 1994
Page 2 of 2

At this point, not enough evidence has been provided to indicate that an off-site source is contributing to the observed contamination on and immediately off your site. Therefore, you are still required to address the off-site contamination. The proposed vapor extraction and air sparging systems only appear to be addressing a portion of the on-site contamination. As stated in the December 23, 1993 letter from this office, based on an insufficient amount of data showing off-site contributors, you are required, per Title 23 California Code of Regulations, to submit a work plan addressing the delineation and containment of the whole plume, including the off-site portion. A work plan addressing this work shall be submitted to this office **within 60 days** of the date of this letter.

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

Sincerely,



Juliet Shin
Hazardous Materials Specialist

cc: John Turney
Hydro Environmental
Technologies, Inc.
2363 Mariner Square Drive, Ste 243
Alameda, CA 94501

Gil Jensen, Alameda County District Attorney's Office

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R023

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

December 23, 1993

Mr. Brian Cobb
E-Z Serve Mgmt. Co.
P.O. Box 922021
Houston, Texas 77292-2021

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

STID 3580

Re: Investigations at 525 West "A" Street, Hayward, California

Dear Mr. Cobb,

This office has received Hydro Environmental's letter, dated December 14, 1993. The letter states, in lieu of implementing containment measures for the off-site contaminant plume, you wish to focus on on-site source removal and determine whether the off-site contamination is resulting from the site. However, although on-site source removal may reduce the amount of contamination migrating off site in the future, it does not address containment and abatement of the current off-site contaminant plume. Furthermore, the proposed air sparging remediation system has the potential for driving the dissolved plume in a horizontal direction due to the presence of relatively impermeable soil zones above the water surface, so off-site containment measures may be even more pertinent.

If it is shown, after conducting the proposed off-site survey in January 1994, that there are no other potential contributors to the off-site contamination, you will be required to submit a work plan addressing the delineation and containment of the contaminant plume, **per Article 11, Title 23 California Code of Regulations**. A report documenting the results of the off-site survey is due to this office by the end of February 1994.

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

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Markus Niebanck
Hydro Environmental Technologies
2363 Mariner Square Drive, Ste 243
Alameda, CA 94501

Gil Jensen, Alameda County District Attorney's Office

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R023

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 13, 1993

Mr. Brian Cobb
E-Z Serve Mgmt. Co.
P.O. Box 922021
Houston, Texas 77292-2021

STID 3580

Re: Work plan for 525 West "A" Street, Hayward, California

Dear Mr. Cobb,

This office has reviewed Hydro Environmental Technologies' work plan, dated December 10, 1993, addressing preliminary tests to aid in choosing an adequate remediation system for the above site. This portion of the required work is acceptable, however, this plan does not address the two most immediate concerns outlined in the August 25, 1993 letter: 1) Abatement of further migration of the ground water contaminant plume, per Section 2722, Article 11, Title 23 California Code of Regulations; and 2) Delineation of the ground water contaminant plume, per Section 2725, Article 11, Title 23 California Code of Regulations.

You are required to submit an addendum to this work plan addressing these concerns within 45 days of the date of this letter. Please be reminded to include timelines for this additional work.

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

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Markus Niebanck
Hydro Environmental Technologies
2363 Mariner Square Drive, Ste 243
Alameda, CA 94501

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R023

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

August 25, 1993

Mr. Brian Cobb
E-Z Serve Mgmt. Co.
P.O. Box 922021
Houston, Texas 77292-2021

STID 3580

Re: Remediation requirements for the site located at 525 West
"A" Street, Hayward, California

Dear Mr. Cobb,

This office has received and reviewed Associated Soils Analysis' Site Investigation Report, dated July 20, 1993. According to recent investigations, **extremely** elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg), as high as 45,000 parts per billion (ppb), and benzene, toluene, ethylbenzene, and xylenes (BTEX) have been identified both on and off the above site. It appears that the observed off-site contamination is resulting from your site. **Per Section 2722, Article 11, Title 23 California Code of Regulations**, you are required to conduct interim remedial actions at the site to abate further migration of this ground water contaminant plume.

Additionally, **per Section 2725, Article 11, Title 23 California Code of Regulations**, you are required to complete assessments to delineate the extent and severity of this soil and ground water contamination. You are required to submit a work plan, addressing both the required interim remedial measures and the delineation of the ground water contaminant plume, **within 45 days** of the date of this letter.

Lastly, this office is uncertain as to whether all the piping was ever removed from the site since the pump islands and canopy are still in place. Please contact this office with information indicating whether this work was ever conducted.

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

Sincerely,


Juliet Shin
Hazardous Materials Specialist

Mr. Brian Cobb
Re: 525 W. "A" St.
August 25, 1993
Page 2 of 2

cc: Greg Sullivan
Associated Soils Analysis
1141 Batavia Ct.
Tulare, CA 93274

Bart Racca
Associated Soils Analysis
1141 Batavia Ct.
Tulare, CA 93274

Gil Jensen-Alameda County District Attorney's Office

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R023

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 9, 1993

Mr. Brian Cobb
E-Z Serve Mgmt. Co
2550 North Loop West, Ste 600
P.O. Box 922021
Houston, Texas 7729-2021

STID 3580

Re: Ground water gradient determinations at 525 West "A"
Street, Hayward, California

Dear Mr. Cobb,

This office recently received Environmental Oversight's Quarterly Monitoring Report for the above site, dated April 12, 1993. The ground water gradient patterns/variations at the site have been very unusual, and this office is requesting that you look into the possible causes of the variations in the gradient (such as pumping of neighboring wells, irrigation of the site or neighboring site, or influences from formerly existing wells on the site that may never have been properly closed).

Additionally, please be reminded that the existing wells and the proposed wells should all be surveyed to the same **established** benchmark to an accuracy of 0.01 feet.

Per this office's earlier conversations with you and your consultants, it is the understanding of this office that the proposed monitoring wells will be installed in June 1993, and that these wells along with the existing wells will all be sampled, and water levels monitored, in the month of June for the required quarterly sampling event.

Please notify this office at least 48 hours in advance of installing and sampling the wells. If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin
Hazardous Materials Specialist

Mr. Brian Cobb
Re: 525 West "A" St.
June 9, 1993
Page 2 of 2

cc: Sumadhu Arigala, RWQCB

Greg Sullivan
Associated Soils Analysis
1141 Batavia Ct.
Tulare, CA 93274

Paul Martin
Environmental Oversight, Inc.
6 Bedford Lane, Ste 100
Conroe, Texas 77384

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R023

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 13, 1993

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

Mr. Brian Cobb
E-Z Serve Mgmt. Co.
2550 North Loop West, Ste 600
P.O. Box 922021
Houston, Texas 7729-2021

STID 3580

Re: Investigations at 525 West "A" Street, Hayward, California

Dear Mr. Cobb,

This office has approved the new locations of the proposed wells as an initial phase of characterizing the ground water contaminant plume resulting from the above site. However, please be reminded that it may be necessary to place additional wells off site in the future, possibly even between the currently proposed wells and the site, in order to better characterize the plume and to accurately determine whether the remediation method that is chosen, such as extraction, is adequately removing the ground water contaminant plume and associated contaminated soil. It is also suggested that the implementation of borings or hydropunches may be helpful as a screening tool in determining prime locations for permanent monitoring wells in the future.

Per a conversation between Greg Sullivan, Associated Soils, and myself on May 13, 1993, he stated Associated Soils would go ahead and apply for the access permit necessary to install the proposed monitoring well to the east. He has estimated that the review and approval process for this access should take approximately two weeks. If there are any problems with meeting this tentative deadline, please get in touch with me immediately. **It is the understanding of this office that once this access permit is granted, work for installing the four proposed monitoring wells will start immediately.**

As stated in our letter to you, dated April 1, 1993, you are required to take the necessary "interim remediation" steps to abate the further migration of this contaminant plume from going off site and remove the free floating product from the site, in conjunction with your work to further delineate the extent of this plume. This office requested that you submit a work plan addressing this issue **by May 30, 1993**. In my conversation with Mr. Sullivan, he stated that no work had yet begun to prepare this work plan. You are required to submit this work plan pursuant to **Section 2722(b), Article 11, Title 23 California Code of Regulations**. Any extensions of the due date or modifications of the required work plan must be approved by this office or RWQCB in writing.

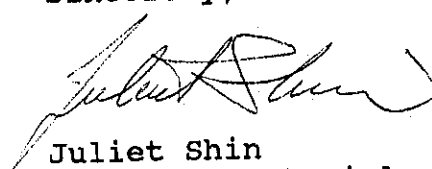
Mr. Brian Cobb
Re: 525 West "A" St.
May 13, 1993
Page 2 of 2

This office has already granted your site a number of extensions for the required work at the site, and is concerned about further delays in the investigations and remediation of the elevated contaminant concentrations observed at your site. Considering that very elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg), as high as 51,000 ppb, and Benzene, as high as 8,800 ppb, were identified in the ground water at your site as early as January 1987, it appears that your progress in addressing this contaminant problem has been rather slow.

Lastly, as was mentioned in the April 1, 1993 letter from the County, I am requesting that I be notified 48 hours in advance of the next quarterly sampling event at the site so that I may be present to observe the water samples. According to my files, your site is past due for another quarterly sampling event.

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

Sincerely,



Juliet Shin
Hazardous Materials Specialist

cc: Sumadhu Arigala, RWQCB

Gil Jensen, Alameda County District Attorney's Office

Bartalome J. Racca
Associated Soils Analysis
1141 Batavia Ct.
Tulare, CA 93274

Maddie MacDonald
Environmental Oversight, Inc.
22 Kazan
Irvine, CA 92714

Jonathan Redding
Fitzgerald, Abbott, & Beardsley
1221 Broadway, 21st Floor
Oakland, CA 94612-1837

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R023

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

April 1, 1993

Mr. Brian Cobb
E-Z Serve Mgmt. Co.
2550 North Loop West, Ste 600
P.O. Box 922021
Houston, Texas 7729-2021

STID 3580

Re: Additional investigation requirements at 525 West "A"
Street, Hayward, California

Dear Mr. Cobb,

In a letter from the County to E-Z Serve, dated April 24, 1992, this office requested that you submit a work plan addressing both the delineation of the ground water contaminant plume resulting from your site, and the containment of the plume from migrating further off the site. To this date, you have submitted a work plan for the installation of additional wells, however, no plan has been submitted addressing the containment of the contaminant plume.

The levels of hydrocarbon contamination observed from the on-site monitoring wells are extremely elevated, and the location of these wells containing these concentrations suggests that contaminants are migrating off the property. As the contaminant plume migrates further off site, the plume will become an increasingly greater problem and the remediation of this plume will become increasingly more difficult and expensive. **Per Section 2722(b), Article 11, Title 23 California Code of Regulations**, you are required to take the necessary "interim remediation" steps to abate the further migration of this contaminant plume from going off site and remove the free floating product from the site, in conjunction with your work to further delineate the extent of this plume. A work plan addressing the containment of this contaminant plume shall be submitted to this office **within 60 days** of the date of this letter.

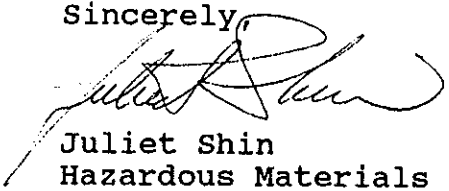
Per a conversation between Greg Sullivan, Associated Soils, and myself on March 29, 1993, there have been some problems acquiring access permission from the neighboring property owners for the installation of monitoring wells. I informed Mr. Sullivan that this office will be assisting you in obtaining the access necessary to install the additional proposed monitoring wells. Please submit the correct neighboring property owner's names, phone numbers, and addresses from which you desire access permission, and I will explain the necessity of these wells to them further.

Mr. Brian Cobb
Re: 525 West "A" St.
April 1, 1993
Page 2 of 2

Additionally, I am requesting that you notify me 48 hours in advance of the next quarterly sampling event at the site so that I may be present to observe the free product measurements.

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

Sincerely,



Juliet Shin
Hazardous Materials Specialist

cc: Sumadhu Arigala, RWQCB

Bartalome J. Racca
Associated Soils Analysis
1141 Batavia Ct.
Tulare, CA 93274

Paul Martin
Environmental Oversight, Inc.
22 Kazan
Irvine, CA 92714

Jonathan Redding
Fitzgerald, Abbott & Beardsley
1221 Broadway, 21st Floor
Oakland, CA 94612-1837

Gil Jensen, Alameda County District Attorney's Office

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R023

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

February 22, 1993

Brian Cobb
E-Z Serve Mgmt. Co.
2550 North Loop West, Ste 600
P.O. Box 922021
Houston, Texas 77292-2021

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

STID 3580

Re: Investigations at 525 West "A" Street, Hayward, California

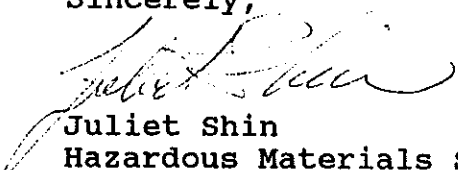
Dear Mr. Cobb,

This office has received and reviewed Environmental Oversight, Inc.'s Quarterly Monitoring Report, dated January 8, 1993. According to the report, a seventh well, Well 1A, was discovered and determined to contain 0.04 feet of free product. **Per Section 2722 (b), Article 11, Title 23 California Code of Regulations,** you are required to implement free product recovery efforts immediately. A work plan addressing the product removal is required to be submitted **within 30 days** of the date of this letter.

Additionally, the elevation contour map included in the most recent quarterly monitoring report indicates a significant change in the behavior of the ground water gradient beneath the site. Due to these inconsistencies, this office is requiring that you begin collecting ground water level measurements and preparing elevation contour maps on a monthly basis, in addition to the quarterly ground water monitoring requirements.

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

Sincerely,


Juliet Shin
Hazardous Materials Specialist

cc: Sumadhu Arigala, RWQCB

Paul Martin
Environmental Oversight, Inc.
6 Bedford Lane, Ste 100
Conroe, Texas 77384

Edgar Howell-File(JS)

Mr. Brian Cobb
RE: 525 West "A" St.
December 31, 1992
Page 2 of 2

completing field activities. Subsequent monitoring reports are to be submitted quarterly until this site qualifies for final RWQCB "sign-off".

Lastly, Eddy So, the Regional Water Quality Control Board contact for the site, has been replaced by Sumadha Arigala. Please copy Mr. Arigala on all correspondence and reports regarding this site.

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

Sincerely,



ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R023

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 3, 1992

Amy Stites
E-Z Serve
Petroleum Marketing Co.
10700 North I-45, Ste 500
Houston, Texas 77037-1187

STID 3580

RE: Required work plan and investigations at 525 West A Street,
Hayward, California

Dear Ms. Stites,

In a letter dated April 24, 1992 this Department notified E-Z Serve that it was required to submit a work plan to address the delineation and containment of the ground water contaminant plume resulting from the above site. E-Z Serve did not respond, therefore, a Notice of Violation letter, dated August 27, 1992, was sent to E-Z Serve requiring that a work plan be prepared, approved, and implemented. In September 1992, E-Z Serve submitted a work plan to this office. However, this report was not submitted under the seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer as required by this Department and the California Regional Water Quality Control Board. In our phone conversation on September 29, 1992, E-Z Serve was notified of this requirement and of the fact that another work plan needed to be submitted.

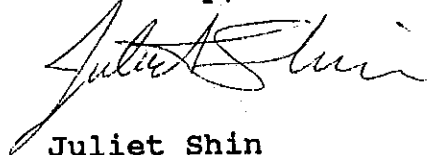
In a phone conversation between us on November 5, 1992, you stated that you would call me back with an estimate as to when E-Z Serve would be submitting the new work plan. To this date, this office has received no return phone call, even though we have left numerous messages with you to contact this office within the course of the last month.

You are required to submit the required work plan, under the seal of a Certified Engineer or Geologist, within 45 days of the date of this letter. Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

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

Ms. Amy Stites
Re: 525 W. A Street
December 3, 1992
Page 2 of 2

Sincerely,



Juliet Shin
Hazardous Materials Specialist

cc: Eddy So, RWQCB

Jonathan Redding
Fitzgerald, Abbott, & Beardsley
1221 Broadway, 21st Floor
Oakland, California 94612-1837

H.E. Lambert
E-Z Serve Petroleum Marketing
Company of California
10700 Interstate 45 North, Suite 500
Houston, Texas 77037-1187

Gil Jensen, Alameda County District Attorney's Office

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R023

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

August 27, 1992

Amy Steitz
EZ Serve Petroleum Marketing
10700 North I-45, Suite 500
Houston, TX 77037-1187

STID 3580

RE: Required work plan for EZ Serve site, located at 525 West A Street, Hayward, California

NOTICE OF VIOLATION

Dear Ms. Steitz,

Ground water samples collected from all the monitoring wells at the above site have identified **very elevated** concentrations of Total Petroleum Hydrocarbons, up to 78,000 parts per billion (ppb), and benzene, as high as 13,000 ppb.

This office required the preparation and submittal of a work plan, in a letter dated April 24, 1992, addressing methods to delineate the contamination zone and to contain further migration of the ground water contaminant plume at the site. This work plan was due in June 1992, however, this office has not yet received it or any requests for an extension of this due date.

You are required to submit a work plan **within 45 days** of the date of this letter, addressing all the issues that were outlined in the letter, dated April 24, 1992, from this office (Please refer to the attached copy of this letter). Please be advised that this is a formal request for technical reports pursuant to **California Water Code Section 13267 (b)**. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

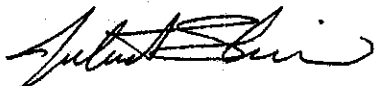
Additionally, you are required to submit reports every quarter for the sampling of **all** the monitoring wells. The last monitoring report received by this office is dated March 2, 1992. **Per Section 2652 (d), Title 23, California Code of Regulations**, the owner or operator shall submit reports to the regulating agency every three months, or at more frequent intervals, until the investigation and cleanup are complete.

Amy Steitz
Re: 525 West A Street
August 27, 1992
Page 2 of 2

Please be reminded to copy Eddy So, at the San Francisco Bay Region-Water Quality Control Board on all correspondence or reports regarding this site.

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

Sincerely,



Juliet Shin
Hazardous Materials Specialist

cc: Eddy So, RWQCB

Hugh Murphy, Hayward Fire Dept.

Bartalome J. Racca
Associated Soils Analysis
1141 Batavia Ct.
Tulare, California 93274

Mark Thompson, Alameda County District Attorney's Office

Edgar Howell-File (JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R023

RAFAT A. SHAHID, Assistant Agency Director

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

April 24, 1992

Amy Steitz
EZ Serve Petroleum Marketing
10700 North I-45, Suite 500
Houston, TX 77037-1187

STID 3580

RE: EZ Serve site, located at 525 West A Street, Hayward,
California

Dear Ms. Steitz,

This office has reviewed the recently submitted monitoring well installation report, dated March 2, 1992. Groundwater samples collected from all the newly installed monitoring wells (MW-1 through MW-6) have identified extremely high concentrations of Total Petroleum Hydrocarbons (TPH) and benzene, toluene, ethylbenzene, and xylenes (BTEX). For example, samples collected from Monitoring Well #5 (MW-5) exhibited 78,000 ppb TPH, and groundwater samples from MW-2 identified 13,000 ppb benzene.

Since all the on-site monitoring wells have identified elevated concentrations of TPH and BTEX, it appears that the contamination plume has migrated off site. You are required to submit a work plan to this office **within 45 days** of the date of this letter, which will address methods to delineate the contamination zone and to contain further migration of the contamination.

Please be advised that subsequent monitoring reports are to be submitted **quarterly** until this site qualifies for final RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter. Groundwater elevations are to be measured monthly for 12 consecutive months and then quarterly thereafter. Groundwater gradient maps must be developed for each water level monitoring event occurring at the site. This groundwater elevation information may be included in the quarterly reports submitted to this office.

The above reports must adhere to the technical requirements outlined in the Regional Water Quality Control Board's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks and the State Water Board's LUFT manual. A

report documenting the results from work performed is due to this office within 45 days of completion of field activities.

If you have any questions, please contact Juliet Shin (510) 271-4320.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Eddy So, RWQCB

Hugh Murphy, Hayward Fire Dept.

Bartalome J. Racca
Associated Soils Analysis
1141 Batavia Court
Tulare, CA 93274

file JS

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R023

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

June 17, 1991

Tina Bowens
Harken Marketing
10700 North Freeway Suite 500
Houston TX 77037

RE: Proposed Work Plan for Former Underground Storage Tank Site
BP Station, 525 West A St., Hayward CA 94541

Dear Ms. Bowens:

I have reviewed the proposed work plan for installation of monitoring wells at the above referenced property. The proposal is acceptable to this office, however, I have the following comments and questions regarding the site and planned monitoring activities:

1. Supply this office and the Regional Water Quality Control Board with a copy of a work plan reviewed and stamped by a California-Certified Engineering Geologist, California-Registered Geologist, or a California-Registered Civil Engineer. Your stamped proposal must be submitted to this office, however, you should implement your proposal without delay.
2. No groundwater monitoring frequency or duration was specified in your proposal. Sample monitoring wells monthly for a minimum of three months. After three months of monthly sampling, sample wells on a quarterly basis for a minimum of one year.
3. Describe any work that has been done at the site to investigate the full depth and lateral extent of soil contamination. Provide information to this office on the status of stockpiled soil.
4. Supply quarterly reports that describe the status of the investigation and work performed during the reporting period. These reports must also interpret sampling data and should include recommendations or plans for further investigation and/or remediation.

Tina Bowens
Harken Marketing Company
June 17, 1991
Page 2 of 2

5. Please supply a tabular listing and a map showing the locations of nearby groundwater wells.

Consistent with the time line that was included in your proposal, I will expect a report of your groundwater monitoring data **no later than October 15, 1991**. You may contact me with any questions at (415)271-4320.

Sincerely,



Pamela J. Evans
Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney's Office
Richard Hiett, RWQCB
James Ferdinand, Eden Consolidated Fire Prevention District

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R023

April 24, 1991

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

Chuck Collins
Harken Marketing
P.O. Box 5657
Riverside CA 92517-9933

RE: Contamination from Former Underground Storage Tanks at
BP Station, 525 West A St., Hayward CA 94541

NOTICE OF VIOLATION

Dear Mr. Collins:

On June 15, 1990, underground fuel storage tanks were removed from the above referenced property. Sampling results showed that gasoline constituents in native and stockpiled soils exceeded Regional Water Quality Control Board (RWQCB) action limits. You were instructed in writing by this office to submit a workplan for investigation and remediation of this contamination by December 30, 1990. Your representative, Tina Bowens, stated in correspondence that a work plan for the installation of five monitoring wells would be submitted to this office by January 15, 1991. To date, no work plan of any kind has been received for the site.

California Health and Safety Code Section 25298 (c) requires that you demonstrate to this agency that any releases from your underground tank have been investigated and that corrective or remedial action has been taken. You are required to investigate the full lateral and vertical extent of petroleum contamination affecting soil and groundwater at and beyond your site. **We require that you submit a work plan to this office by May 24, 1991.** This work plan must, at a minimum, address the following items:

1. Site History: Site use, any known hazardous materials spills, leaks, or accidents
2. Site Description: Hydrogeologic setting, including soil type(s), depth to groundwater, direction of groundwater flow, and characteristics of the aquifer(s)
3. Investigation Method: Method by which full lateral and vertical extent of contamination will be determined
 - a. A minimum of three groundwater monitoring wells is required in order to determine groundwater flow direction.
 - b. Groundwater samples from monitoring wells must be collected by a qualified person familiar with EPA and DHS sampling protocol. Samples must be analyzed by a state certified laboratory for TPH and BTEX constituents.

Chuck Collins
Harken Marketing
April 24, 1991
Page 2 of 2

R023

4. Planned Remediation or Disposal of Stockpiled Soil
5. Site Safety Plan

This is a formal request for technical reports pursuant to California Water Code Section 13267 (b). This office is working in conjunction with the RWQCB. All proposals, reports, and analytical results pertaining to this investigation and remediation must be sent to this office and to:

Richard Hiatt
Regional Water Quality Control Board
2201 Webster St., 4th Floor
Oakland CA 94612

Be aware that Section 13268 (a) of the State Water Code states that failure to furnish reports as required by section 13267 (b) is a misdemeanor and provides for civil penalties.

You may contact me with any questions at 271-4320.

Sincerely,



Pamela J. Evans
Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney's Office
Richard Hiatt, RWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R023

November 27, 1990

Chuck Collins
Harken Marketing
P.O. Box 5657
Riverside CA 92517-9933

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

RE: Contamination at BP Station, 525 W. A St., Hayward CA 94541

Dear Mr. Collins:

I have reviewed the analysis results of the soil samples taken August 24 from the former pump and piping area at the A St. site. Fuel constituent levels (TPHg, TPHd, and BTEX) found in this area and previously in the former tank pit require further investigation and remediation. As was stated in the last correspondence from this office, you are required to submit a workplan **no later than January 15, 1991**, that addresses the following issues:

1. How contaminated stockpiled soil will be remediated and/or disposed of
2. The manner in which the full lateral and vertical extent of contamination will be defined and remediated
3. Hydrogeologic conditions and the manner in which possible groundwater contamination, on and offsite, will be investigated

In your last correspondence, you stated your intention to sample the six monitoring wells at the site. Please supply this office with the geologist's/engineer's report of the well locations and well construction data, as well as the complete sampling and analysis history for each well. This information must be submitted **no later than December 15, 1990**. Also required by that date are copies of the Hazardous Waste Manifests for the removed tanks signed by a representative of the treatment facility that received them. You may contact me with any questions at (415)271-4320.

Sincerely,

Pamela J. Evans
Hazardous Materials Specialist

c: Richard Hiatt, Regional Water Quality Control Board

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



R023

Telephone Number: (415)

July 12, 1990

Chuck Collins
Harken Marketing
P.O. Box 5657
Riverside CA 92517-9933

RE: Remediation Activity at BP Station, 525 W. A St., Hayward

Dear Mr. Collins:

My staff has reviewed the sampling results submitted by Consolidated Testing Laboratories, Inc. for the A Street site. Total Petroleum Hydrocarbon (TPH) soil concentrations exceeded levels that would allow immediate backfilling and closure. Therefore, this office will expect a remediation work plan for the site. Please submit this work plan by August 12, 1990 and address the following issues:

1. How stockpiled soil will be remediated and/or removed to an appropriate disposal facility.
2. The manner in which the full lateral and vertical extent of the contamination will be defined and remediated.
3. How piping associated with the tank removals was dismantled and disposed of, and whether any sampling has been done beneath the pipes.

It has come to my attention that new tanks may be installed at this site at some point in time. To date, this office has not received installation plans. This Department must review and accept any underground storage tank installation plans before work proceeds. If installation work is planned, please inform us of the approximate date and submit plans before proceeding. You may contact Hazardous Materials Specialist Pamela Evans with any questions at 271-4320.

Sincerely,

Edgar B. Howell III, Chief
Hazardous Materials Division

EBH:PJE

c: Richard Hiett, Regional Water Quality Control Board
Howard Hatayama, Department of Health Services
James Ferdinand, Eden Fire Protection District
John Jones, Triple "J" Construction

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R023

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

May 23, 1990

Chuck Collins
Harken Marketing
P.O. Box 5657
Riverside CA 92517-9933

RE: Closure Plan for Fuel Storage Tank Removal at BP Station,
525 W. A St., Hayward

Dear Mr. Collins:

My staff has reviewed the closure plan submitted by Triple "J" Construction for the above referenced site. As discussed today by telephone with John Jones of Triple "J" Construction, the following additional information and documents are needed in order for the plan to be accepted:

1. This office does not have on file an unauthorized release report form which is required once a hazardous material leak has been discovered. A form has been enclosed for your convenience, and one also will be sent to Triple "J".
2. A description of the chemical analysis methods must be included in the plan (item #17). John Jones with Triple "J" has agreed to supply this information.

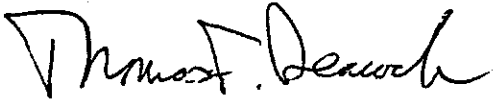
Pen and ink changes to the original closure plan and Site Safety Plan include the following:

1. Quality Vacuum will transport any product that may be left in the tanks along with the rinsate generated from cleaning them.
2. Site workers will be briefed on hazards and safety procedures prior to tank removal.
3. Safety goggles and gloves resistant to petrochemicals will be available onsite to workers.
4. An explosimeter will be used to monitor hazardous vapors and oxygen levels. Meters are calibrated offsite with hexane as the test gas.
5. Three fire extinguishers will be placed onsite in marked spots near the excavations.

May 23, 1990
Chuck Collins
Harken Marketing
RE: Closure Plan for 525 W. A St., Hayward
Page 2 of 2

Final acceptance of your closure plans may occur once the Release Report and chemical analysis information is received by this office. Please contact Hazardous Materials Specialist Pamela Evans with any questions at 271-4320.

Sincerely,



Edgar B. Howell III, Chief
Hazardous Materials Division

EBH:PJE

enclosures

c: Lester Feldman, Regional Water Quality Board
Howard Hatayama, Department of Health Services
James Ferdinand, Eden Fire Protection District
John Jones, Triple "J" Construction



Certified Mailer #P 833 981 461

June 23, 1989

Sandra L. Hurst, Environmental Concerns
Harken Marketing Co. of California
P.O. Box 5657
Riverside, CA 92517-5657

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415) 271-4320

Re: 525 West "A" St., Hayward, CA

SECOND NOTICE OF VIOLATION

Dear Ms. Hurst:

On February 29, 1989 instructions for submission of a Business Plan and permit applications for two underground storage tanks were left with the person in charge of your station at the above address. In accordance with the California Administrative Code, Title 23, Chapter 3, Subchapter 16 Underground Tank Regulations you must perform one of the following actions:

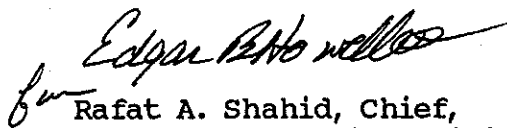
1. Submit a tank closure plan to this Department as required by Article 7, 2670 or
2. Apply for a permit as required by Article 10, 2710, for the 4 tanks that you are currently operating.

Submit the permit applications within 10 days as you seem to be currently operating the tanks. Part A and 4 part B applications are attached for your submission.

You must also submit a Business Plan. A Part I form is attached for your use.

If you have any questions concerning this matter, please contact Tom Peacock, Senior Hazardous Material Specialist, at 271-4320.

Sincerely,


Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:tfp

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection

ALAMEDA COUNTY
HEALTH CARE SERVICES

DAVID J. KEARS AGENCY
~~XXXXXXXXXXXX~~ Agency Director



R023

470-27th Street, Third Floor
Oakland, California 94612
(415) 874-7237

May 15, 1987

E.Z. Service of California
P.O. Box 3550
Ontario, CA 91761

Dear Sir:

We are in receipt of your report from Converse Environmental Consultant of California, concerning the fuel leak report for station No. 1235, 525 West "A" Street, Hayward.

The determination that soil contamination exceeds 1000 ppm on site requires under Sec. 66328(d), Title 22, California Administrative Code, that you submit a written plan of correction, which states the actions to be taken and the expected dates of completion. As stated in the report, RWQCB is to set target clean-up levels, please send us copies of any correspondence with RWQCB or other agencies involved with this site clean-up.

If you have any questions, please contact Edgar B. Howell, III, Senior Hazardous Materials Specialist, at (415) 874-7237.

Sincerely,

Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:mnc

cc: John D. Gallinatti, CECC
Dwight Hoenig, DOHS
RWQCB
Eden Consolidated Fire District
Jerry Winn, Dir. Dept. of Environmental Health