ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY



05-2407 RO 10 VRO 185

DAVID J. KEARS, Agency Director

March 23, 2006

Mr. Jeff Rubin Port of Oakland 530 Water St. Oakland. CA 94604-2064 ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1121 Harbor Bay Parkway, Suite 250

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

Dear Mr. Rubin:

Subject: Fuel Leak Cases RO0000010 and RO0000185, 2277 and 2225 7th St., Oakland, CA 94607

Alameda County Environmental Health (ACEH) has reviewed the case file for the subject site including the January 2006 Fourth Quarter Groundwater Monitoring Report prepared by Baseline. We concur with the recommendation to change the monitoring schedule from quarterly to semi-annually. We have the following comments and request that you submit the technical reports requested below.

TECHNICAL COMMENTS

- 1. We concur with the proposal to install ORC socks into MW-4 given the historic low levels of TPHg and BTEX detected in this well.
- 2. We concur with the proposal to perform a pilot test using low vacuum to optimize free product removal from recovery wells.

TECHNICAL REPORT REQUEST

- April 21, 2006- Report on the removal of free product from the recovery wells, including the amount removed from each well and cumulative amount.
- August 15, 2006- First Semi-annual monitoring report
- January 2, 2007- Second Semi-annual monitoring report and work plan for the installation of replacement wells on the east portion of the sites.

ELECTRONIC SUBMITTAL OF REPORTS

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

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic

Mr. Jeff Rubin March 23, 2006 Page 2 of 3

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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic reporting).

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

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

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

Mr. Jeff Rubin March 23, 2006 Page 3 of 3

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) 567-6765.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

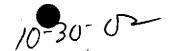
cc: files, D. Drogos

Mr. James McCarty, Baseline, 5900 Hollis St., Suite D, Emeryville, CA 94608-2008

3_23_06 2225&2277 7th St

AGENCY





DAVID J. KEARS, Agency Director

RO0000185

October 29, 2002

Mr. Karen Streich Chevron P.O. Box 6004 San Ramon, CA 94583 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Mr. Ardavan Onsori 29310 Union City Blvd Union City, CA 94587

RE: Feasibility Study for Chevron 9-7127 at I-580 and Grant Line Rd, Tracy, CA

Dear Ms. Streich and Mr. Onsori:

In February 2002, I requested that a Remedial Action Plan (RAP) be submitted for the above referenced site. Please let me clarify that the RAP should evaluate several technically and economically feasible methods to remediate soil and groundwater, and will adequately protect human health and safety, the environment, eliminate nuisance conditions, and protect water resources. Of the technical methods evaluated, the RAP shall detail the cleanup alternative you plan to implement at the site. The RAP should also propose verification monitoring to confirm completion and or effectiveness of cleanup at the site.

The required RAP is due within 45 days of the date of this letter, or by December 20, 2002. If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

email: Ben Heningburg, Delta Environmental

chevrontracy-15

AGENCY



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DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES

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

R00000185

February 7, 2002

Mr. Tom Bauhs Chevron P.O. Box 6004 San Ramon, CA 94583

Mr. Ardavan Onsori 29310 Union City Blvd Union City, CA 94587

RE: RAP for Former Chevron 9-7127 at I-580 and Grant Line Rd, Tracy, CA

Dear Messrs. Bauhs and Onsori:

I have completed review of Gettler-Ryan's December 2001 *Groundwater Monitoring Sampling Report* prepared for the above referenced site. Onsite monitoring wells were sampled in November 2001. Well MW-1 contained separate phase hydrocarbon and Well MW-3 contained 100,000ppb TPHg and 23,000ppb benzene. A review of historic groundwater data reveals that hydrocarbon concentrations in Well MW-3 are increasing. This suggests that the plume is slowly migrating from the source area (former tank pit) to beyond well MW-3.

Although past investigations completed to date suggest that the plume does not pose a risk to human health and is not likely to impact the lower aquifer (at greater than 300 feet bgs), active remediation is now required to minimize the spread of contamination into previously uncontaminated zones. The prior use of ORC and hydrogen peroxide does not appear to help biodegrade hydrocarbons at the site. At this time, a workplan for the remediation of elevated hydrocarbons in groundwater using another technology is required. The workplan is due within 90 days of the date of this letter, or by May 13, 2001.

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

eva chu

Hazardous Materials Specialist

email: James Brownell

chevrontracy-14

HEALTH CARE SERVICES



DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES

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

RO0000185

May 10, 2001

Mr. Tom Bauhs Chevron Products P.O. Box 6004 San Ramon, CA 94583

RE: Interim Corrective Action Plan (CAP) for Former Chevron Service Station 9-7127

at I-580 and Grant Line Road, Tracy, CA

Dear Mr. Bauhs:

I have completed review of Delta Environmental Consultants, Inc.'s (Delta) May 2001 Interim Corrective Action Plan prepared for the above referenced site. Delta proposed to hand-bail separate phase hydrocarbon (SPH) from well MW-1 on a monthly basis. In between the SPH bailing events, a passive product skimmer will be place in MW-1. In addition, Delta proposed to decommission the onsite domestic well. The proposed interim CAP is acceptable.

This office is not in receipt of a semi-annual monitoring report (SMR) since September 2000. Groundwater data from the October 2000 sampling event, however, was included in the May 2001 report. The SMR is past due. In the meantime, you should continue with semi-annual monitoring of all onsite wells. Technical reports are due 60 days upon completion of field work. For the next sampling event, please confirm MTBE and other ether oxygenates using EPA Method 8260.

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

eva chu

Hazardous Materials Specialist

email: Ben Heningburg

AGENCY



(CHEURON #9-7127)

RO# 185

StID 4100

February 5, 1999

Mr. Phil Briggs Chevron, Building L P.O.Box 5004 San Ramon, CA 94583-0804

DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES

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

Station at I-580 and Grant Line Road, Tracy, CA Dear Mr. Briggs:

RE:

I have completed the review of the case file for the above referenced site to determine what issues may need to be addressed before the site can be designated a low risk groundwater case. There appears to be two criteria that does not meet the Central Valley RWQCB's guidance for no further action at a leaking underground storage tank site (the draft Appendix B is enclosed). The two issues that need further interpretation or characterization are:

Vertical Extent of Groundwater Contamination at the Former Chevron Service

1. No existing water supply wells, deeper aquifers, surface waters or other receptors are threatened by pollutants remaining in the aquifer.

The onsite domestic well contained detectable levels of benzene (up to 6.4ppb) in 1987 and 1989 (see attached table). It is assumed this well is constructed and screened deeper than the onsite groundwater monitoring wells. It must be verified that groundwater contamination has not impacted the deeper aquifer. Therefore, the vertical extent of the contaminant plume must be determined.

2. The total pollutant mass remaining in the groundwater is decreasing at predicted rates and neither creates, nor threatens to create, a risk to human health and safety or future beneficial uses(s) of the aquifer.

Onsite groundwater monitoring wells MW-1 and MW-3 continues to contain measurable free product or a heavy sheen. Recent benzene levels were at 24,000ppb. Active remediation appears necessary to reduce the total pollutant mass in groundwater.

A workplan and/or discussion to address the above issues should be submitted to this office for review within 60 days of the date of this letter, or by April 9, 1999. If you have any questions, I can be reached at (510) 567-6762.

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Hazardous Materials Specialist

enclosures

chvrontracy12

AGENCY



DAVID J. KEARS, Agency Director

R0#185

ENVIRONMENTAL HEALTH SERVICES

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

StID 4100

August 3, 1998

Mr. Phil Briggs Chevron, Building L P.O.Box 5004 San Ramon, CA 94583-0804

RE:

ORC for Wells at Former Chevron Service Station #9-7127, I-580 and

Grantline Road Near Tracy, CA

Dear Mr. Briggs:

Thank you for the submittal of the recent semi-annual monitoring report and charts comparing various indicator parameters across the dissolved plume against BTEX concentrations. Most of the bio-parameters analyzed suggest that intrinsic bioremediation is occurring at the site. Therefore, per your request, you may add Oxygen Releasing Compound (ORC) to the wells located in the plume (MW-1, MW-3, and MW-4). Hopefully, this will expedite plume reduction.

In a recent telephone conversation, you requested a letter approving the construction/development of the site. The LOP program evaluates if there would be any restriction to development due to residual hazardous waste at the site. For this site, it has been determined that volatilization of residual hydrocarbon contamination in soil and groundwater to indoor or outdoor air (for a commercial scenario) does not pose an excess risk to human health. However, there is a potential for contaminants to leach from soil into groundwater. Groundwater ingestion is a problem that will be remedied with the installation of a carbon adsorption canister to the existing water supply line at the time of proposed construction, as we have previously discussed and agreed.

Other aspects of land development, such as the installation of a private sewage disposal system or the availability of a potable water supply, can be addressed by Mr. Joe Winchester (land-use staff). He can be reached at (510) 567-6712.

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

eva chu

Hazardous Materials Specialist

c: Ardavan Onsori, 29310 Union City Blvd, Union City, CA 94587 Joe Winchester, ACDEH

chyrontracy-11

AGENCY



DAVID J. KEARS, Agency Director

RO#185

ENVIRONMENTAL HEALTH SERVICES

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

StID 4100

September 11, 1997

Mr. Philip Briggs Chevron, Building L P.O. Box 5004 San Ramon, CA 94583-0804

Re: RBCA Evaluation for Former Chevron SS #9-7127, Interstate

I-580 and Grantline Road, Tracy, CA

Dear Mr. Briggs:

Pacific Environmental Group's revised Risk-Based Corrective Action-Tier 2, dated August 1997, has been reviewed and it appears that residual hydrocarbons in soil and groundwater do not pose a risk greater than 10⁻⁵ for volatilization from soil and groundwater to indoor and outdoor air for a commercial scenario. However, groundwater ingestion can still pose a human health risk. Please advise this agency if the onsite water supply well will be properly abandoned or carbon adsorption vessels will be installed to treat water from the well prior to use. Either option is acceptable.

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

eva chu

Hazardous Materials Specialist

c: Ardavan Onsori, 29310 Union City 6 14,

Unun City, CA 94587

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AGENCY



DAVID J. KEARS, Agency Director

RO#185

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

StID 4100

November 8, 1996

Mr. Philip Briggs Chevron, Building L P.O. Box 5004 San Ramon, CA 94583-0804

RE: Sampling Frequency for Former Chevron SS #9-7127, Interstate 580 and Grantline Road, near Tracy

Dear Mr. Briggs:

Thank you for the second and third Quarter Groundwater Monitoring reports for 1996 for the above referenced site. The reports have been reviewed and there is now sufficient data collected where the sampling frequency for the groundwater monitoring wells may be changed as follows:

- 1. Sample semi-annually (in May and November) wells MW-1, MW-3, MW-4, and MW-6; and,
- 2. Sample annually (in May) wells MW-2, MW-5, MW-7, MW-8.

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

eva chu

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Hazardous Materials Specialist

HEALTH CARE SERVICES



DAVID J. KEARS, Agency Director



RO申185 RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH 1131 Harbor Bay Parkway Alameda, CA 94502-6577 (510) 567-67/20

StID 4100

March 29, 1996

Mr. Kenneth Kan Chevron P.O. Box 5004 San Ramon, CA 94583-0804

RE: Risk Assessment Work Plan Approval for Former Chevron #9-7172, Hwy I-580/Grantline Rd, Tracy, CA 95376

Dear Mr. Kan:

I have completed review of Pacific Environmental Group, Inc's March 1996 Risk Assessment Work Plan, and Addendum to said workplan for the above referenced site. The proposal to determine human health risk associated with the future development of the site using ASTM's RBCA Tier 1 and Tier 2 framework is acceptable. The completed RBCA evaluation is due within 60 days of the date of this letter.

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

eva chu

Hazardous Materials Specialist

c: Mark Sullivan, PEG, 2025 Gateway Pl, Suite 440, San Jose 95110 files

AGENCY

DAVID J. KEARS, Agency Director



RO# 185 RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Parkway Alameda, CA 94502-6577 (510) 567-6777

StID 4100

February 5, 1996

Mr. Kenneth Kan Chevron P.O. Box 5004 San Ramon, CA 94583-0804

Risk Analysis for Former Chevron #9-7127, RE: Hwy I-580/Grantline Rd, Tracy, CA 95376

Dear Mr. Kan:

I have completed review of Pacific Environmental Group's January 1996 Groundwater Investigation Report for the above referenced site. This report documents the installation of three additional groundwater monitoring wells (MW-6, MW-7, and MW-8) to delineate the off-site extent of dissolved hydrocarbons in groundwater. Soil and groundwater samples from the wells did not contain detectable levels of TPH-G or BTEX. It appears that the extent of the contaminant plume has been delineated.

The most recent groundwater sampling event (November 1995) exhibited up to 15,000 ppb benzene in well MW-1 and 8,000 ppb benzene in well MW-3. Currently, there are tentative plans to develop this site. Before development commences a risk analysis should be performed, possibly using the American Society of Testing and Materials' (ASTM) standard for Risk-Based Corrective Action (RBCA), to determine cleanup levels that are protective of human health. Results of the risk analysis would also determine the types of development which is appropriate/acceptable at this site.

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

eva chu

Hazardous Materials Specialist

files cc:

chvront.7

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Division 80 Swan Way, Rm. 200 Oakland, CA 94621

(510) 271-4320

StID 4100

November 14, 1994

Mr. Kenneth Kan Chevron USA P.O. Box 5004 San Ramon, CA 94583-0804

RE: Additional Site Investigation at Former Chevron #9-7127, Hwy I-580/Grantline Rd, Tracy, CA 95376

Dear Mr. Kan:

I have completed review of Weiss Associates's (WA) October 1994 Comprehensive Site Evaluation and Proposed Future Action Plan and Sierra Environmental's October 1994 quarterly monitoring report for the above referenced site. WA concluded that "additional plume definition and quarterly monitoring to more fully establish the plume location, and to determine whether significant offsite transport is occuring" is needed before recommending this site become a potential candidate for establishment of a non-attainment area. To obtain these data, WA is proposing that an additional monitoring well be installed north of the former septic tank pit, near the location of boring B-3. This office concurs with the above recommendations and field activities for the installation of well MW-6 should commence within 45 days of the date of this letter, or by January 4, 1994.

I was under the impression that Highway I-580 is north of the subject property. If this is the case, additional wells west or south of MW-4 is possible, if needed, to further delineate the extent of the contaminant plune in these directions. Please show I-580 in relation to the property in future reports.

WA does not believe that groundwater and soil vapor extraction is feasible for this site. However, there are other remedial technologies available, such as air sparging to enhance natural biodegradation, which your consultants should consider for site remediation.

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

eva chu

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Hazardous Materials Specialist

cc: Cynthia Okano, WA 5500 Shellmound St, Emeryville 94608 files (chyronts)

DAVID J. KEARS, Agency Director

R0185

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

StID 4100

July 19, 1994

Mr. Kenneth Kan Chevron USA P.O. Box 5004 San Ramon, CA 94583-0804

RE: Additional Investigations at Former Chevron #9-7127, Hyw I-580/Grantline Rd, Tracy, CA 95376

Dear Mr. Kan:

I have completed review of Sierra Environmental's report of groundwater monitoring/sampling performed on April and June 1994 for the above referenced site. Results of laboratory analysis of groundwater show elevated levels of dissolved hydrocarbons in wells MW-1, 3, and 4. Groundwater flow direction is predominately to the NE to E, when using elevations from wells MW-2, 3, and 4.

At this time, additional investigations are required to determine the extent of the contaminant plume. At least one well should be advanced north of the former septic tank pit. Please submit a workplan for the proposed work to this office by August 26, 1994.

Once the site has been characterized, a Corrective Action Plan, or CAP, is required to identify and evaluate all feasible alternatives for cleanup of soil and groundwater impacts resulting from the unauthorized release at this site. This CAP was requested in my letter dated April 8, 1994, but an extension for the submittal of this workplan is granted at this time. The CAP is due once the site has been characterized.

Also, <u>monthly</u> groundwater monitoring should be conducted at this site for the next 6 months, at which time it will be determined if there is sufficient data to determine groundwater flow direction.

If you have any questions, I can be reached at (510) 337-2869.

eva chu

Hazardous Materials Specialist

cc: files (chvront5)

DAVID J. KEARS, Agency Director

R0185

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board

Division of Clean Water Programs UST Local Oversight Program 80 Swan Way, Rm 200 Oakland, CA 94621

(510) 271-4530

StID 4100

April 8, 1994

Mr. Kenneth Kan Chevron P.O. Box 5004 San Ramon, CA 94583-0804

Subject: CAP for Former Chevron #9-7127, Hwy I-580/Grantline Rd, Tracy, CA 95376

Dear Mr. Kan:

I have completed review of Sierra Environmental's March 1994 Quarterly Monitoring Report for the above referenced site. Groundwater flow direction at the time of sampling was toward the easterly direction. Previous flow direction has been toward the north, northwest. At this time, water elevations should be measured on a monthly basis to verify groundwater flow direction. Also, a quarterly sampling schedule should be established for the site. The next sampling episode should be in May 1994.

Additionally, pursuant to requirements set forth under Article 11, 23CCR, Section 2720 et seq., you are further directed to submit a <u>Corrective Action Plan</u> (CAP) proposal for further investigation of this site, and to identify and evaluate all feasible alternatives for cleanup of soil and groundwater impacts resulting from the unauthorized release at this site. This CAP proposal is due within 45 days of the date of this letter.

Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.

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

eva chu

Hazardous Materials Specialist

cc: files

chvront4

DAVID J. KEARS, Agency Director

BO 185

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 4100

March 29, 1993

Mr. Kenneth Kan Chevron USA P.O.Box 5044 San Ramon, CA 94583-0804 DEPARTMENT OF ENVIRONMENTAL HEALTH State Water Resources Control Board Division of Clean Water Programs UST Local Oversight Program 80 Swan Way, Rm 200 Oakland, CA 94621 (510) 271-4530

Subject: Groundwater Investigation for Former Chevron #9-7127, Highway I-580 and Grantline Road, Tracy, CA 95376

Dear Mr. Kan:

This office has completed review of Pacific Environmental Group's soil and groundwater investigation report, dated March 22, 1993, for the above referenced site. Water samples collected indicate groundwater to be impacted by the fuel release from the former underground storage tanks (USTs).

At this time additional investigation is required to determined the extent and severity of groundwater contamination on-site and possibly off-site. A workplan detailing this investigation should be submitted to this office for review within 45 days of the date of this letter. Information gathered from this investigation will be used to identify and evaluate all feasible alternatives for cleanup of soil and groundwater.

Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB. Copies of all proposals and reports must also be sent to Ms. Beth Thayer of the CV-RWQCB. Their address is 3443 Routier Rd., Suite A, Sacramento, CA 95827-3098.

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

Sincerely,

Eva Chu

Hazardous Materials Specialist

cc: Beth Thayer, CV- RWQCB, 3443 Routier Rd., Suite A, Sacramento, CA 95827-3098

Gil Jensen, Alameda County District Attorney's Office Edgar Howell/files

ChvronT3

RAFAT A. SHAHID, Assistant Agency Director

StID 4100

July 10, 1992

Ms. Nancy Vukelich Chevron USA P.O. Box 5004 San Ramon, CA 94583-0804 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Division 80 Swan Way, Rm. 200 Oakland, CA 94621 (510) 271-4320

Subject: Work Plan for Former Chevron Station 9-7127 Highway I-580 and Grantline Rd., Tracy 95376

Dear Ms. Vukelich:

This office has reviewed the work plan prepared by Pacific Environmental Group, Inc. (PEG), dated July 3, 1991, and find the following items needing clarification and/or modification:

- 1. A minimum of three monitoring wells is to be installed if ground water gradient cannot be confirmed. One downgradient well each must be installed within 10' of both the fuel underground storage tank (UST) and waste oil/fuel tank pits.
- 2. The work plan makes reference to several field activities performed by EA Engineering Science and Technology (November 1987), Kleinfelder (December 1987, January and March 1988), and Gettler-Ryan Inc. (September 1989). To our knowledge, these reports were never sent to this office for review. As these reports will help to evaluate the site history and possible appropriate course of action, we are requesting that copies of these reports be sent.

Be advised that additional soil borings may be needed east and west of the fuel UST pit and north of the former dispenser island to adequately determine the lateral extent of soil contamination should our review of these reports indicate so.

- 3. A proposal should be submitted to address the remediation of contaminated soil under the former fuel UST pit (up to 710 parts per million of total petroleum hydrocarbons as gasoline was detected at a depth of 14' below ground surface).
- 4. Monitoring well construction plans should include the rationale for the selection of screen slot size, casing type, diameter, etc. Include plans for characterizing and disposing of cuttings.

Ms. Nancy Vukelich Former Chevron Station 9-7127 July 10, 1992

- 5. Ground water sampling proposal should include a Quality Assurance/Quality Control (QA/QC) plan. This QA/QC plan must include appropriate elements identified in Table 3-7, Appendix D, of the State Water Resources Control Board LUFT Field Manual. Also, the sampling plan should include sampling of the on-site domestic well for TPH-D, TPH-G, and BTEX. Discuss the Chain of Custody procedures to be followed.
- 6. A Site Safety Plan must be provided which adheres to criteria outlined in Title 29 of the Code of Federal Regulations, Part 1910.120.

Please respond to the items listed above within 20 days of the date of this letter. Your response should be in the form of an addendum to the July 3, 1991 PEG work plan. Once the proposal is approved, field work should commence within 60 days. Please submit a project time schedule for when each aspect of the subsurface investigation and remediation will occur.

Summary reports should be submitted to this office <u>and</u> to Mr. Eddy So of the RWQCB within 45 days upon completion of field activities. Subsequent reports are to be submitted quarterly until this site qualifies for final RWQCB "sign off."

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

If you have any questions about the content of this letter, please contact Ms. Eva Chu at (510) 271-4530.

Sincerely,

Scott O. Seery, CHMM

Senior Hazardous Materials Specialist

cc: Eddy So, RWQCB

Mark Thomson, Alameda County District Attorney's Office Jerry Mitchel, Pacific Environmental Group, Inc.,

620 Contra Costa Blvd., Suite 209, Pleasant Hill,

California, 94523

Edgar Howell/files

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

June 5, 1991

Ms. Nancy Vukelich Chevron, U.S.A. P.O. Box 5004 San Ramon, CA 94583-0804 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

RE: Site investigation and remediation requirements following underground tank removals from former Chevron 9-7127, I-580 & Grantline Rd., Alameda County

Dear Ms. Vukelich:

On April 4, 1991, Golden West Builders removed five underground storage tanks from the above location, three that contained gasoline, one that contained waste oil, and one that contained heating oil. Gasoline contamination during the removal was obvious. Results of soil samples collected from beneath the tanks confirmed this contamination, showing levels of gasoline at up to 5,700 parts per million (ppm). Apparently, additional excavation occurred several weeks later, and soil samples collected after this excavation was completed still contained gasoline. Based on this information, the Regional Water Quality Control Board (RWQCB) requires a preliminary contaminant assessment to be initiated at this site. Please file an Unauthorized Release Report with this office immediately. Then, please submit a preliminary assessment work plan to us that addresses the points raised in this letter and its attachment.

This office will be the lead agency overseeing environmental investigation and cleanup activities at the site. The RWQCB is currently unable to manage the large number of fuel leak cases within Alameda County, and has therefore delegated this authority to our office. However, you must keep the Water Board apprised of all actions taken to characterize and remediate contamination at this site, because the Board retains the ultimate responsibility for ensuring protection of waters of the state.

The preliminary investigation should assess the extent of soil and groundwater contamination resulting from the tanks. The information gathered by this investigation will dictate whether additional actions are needed at the site. The preliminary assessment should be designed to provide all of the information in the format shown in the attachment at the end of this letter, which is based on RWQCB guidelines. At least three monitoring wells shall be installed around the former gasoline tank pit, to enable determination of groundwater flow direction beneath the site, and to check for the extent (if any) of groundwater contamination.

Ms. Nancy Vukelich June 5, 1991 Page 2 of 2

Until remediation is complete, Chevron must submit reports to this office and to the RWQCB every three months (or at a more frequent interval, if specified at any time by either agency). These reports must include information pertaining to further investigative results; the methods and costs of cleanup actions implemented to date; and the method and location of disposal of any contaminated material.

Soils contaminated at hazardous waste concentrations (defined specifically as above 1,000 ppm gasoline) should be transported by a licensed hazardous waste hauler and disposed of or treated at a facility approved by the CA Department of Health Services. Soils contaminated below the hazardous waste threshold may be managed as nonhazardous, but are still subject to the RWQCB's waste discharge requirements. Copies of manifests or receipts for all soil disposal must be sent to this office. Currently stockpiled soil may require further characterization prior to disposal.

Please submit a work plan to this office no later than July 3, 1991. Copies of the proposal should also be sent to the RWQCB (attention: Lester Feldman). Because we are overseeing this site under the designated authority of the Water Board, this letter constitutes a formal request for technical reports, per Sec. 13267(b) of the California Water Code. Failure to respond in a timely manner could result in civil liabilities under the Water Code of up to \$1,000 per day. Other violations of California law may also be cited.

If you have any questions about this letter or about remediation requirements established by the RWQCB, please contact the undersigned at 271-4320.

Sincerely,

Gil Wistar

Willes M. Wiston

Hazardous Materials Specialist

enclosure

cc: Howard Hatayama, DOHS
Lester Feldman, San Francisco Bay RWQCB
Rafat Shahid, Asst. Agency Director, Environmental Health
files

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

Certified Mailer # P 062 127 767

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

March 11, 1991

Mr. Murray Kelsoe P. O. Box 392 Alamo, CA 94507

FINAL NOTICE OF VIOLATION

Dear Mr. Kelsoe:

As stated to you in a September 19, 1990 letter, the Alameda County Department of Environmental Health, Hazardous Materials Division enforces provisions of state law pertaining to underground tanks within Alameda County. Last September, we inspected your facility at I-580 and Grantline Rd., and found that you as the owner/operator needed to accomplish several tasks at this filling station in order to comply with state law. In the September 19 letter, the Division spelled out these deficiencies and required that you respond by October 19. On two separate occasions since, this office sent you Notices of Violation: on November 13, 1990, and on January 22, 1991. Despite these letters, each of which established response deadlines that have passed, this office has received no communication from you.

The filling station is in violation of the provisions of state law indicated below.

- Sec. 25298, CA Health and Safety Code This section of code states that underground tanks must be permitted properly, or else removed according to state law. Your tanks have not been permitted, since there are no permit application forms on file.
- 2. Sec. 2712. Title 23. CA Code of Regulations The gasoline tanks on the premises are of single-wall construction, and therefore require specific monitoring techniques; these usually consist of annual precision testing, daily inventory reconciliation, and automatic pipeline shutdown devices. There are no records of annual precision testing on file. In addition, there were no records of daily inventory reconciliation available to review on-site, as state law requires.
- 3. <u>Sec. 2644, Title 23</u> No quarterly reports summarizing inventory reconciliation for the underground tanks have been submitted to this office.

Mr. Murray Kelsoe March 11, 1991 Page 2 of 2

- 4. <u>Sec. 25504(a), CA H&SC</u> No emergency business plan has been submitted to this office. The business plan requires inventory information on all hazardous materials in quantities beyond specified thresholds. This list has not been provided.
- 5. Sec. 25504(b), CA H&SC The business plan also requires emergency response plans and procedures in the event of a reportable release or a threatened release of a hazardous material or waste. At a minimum, this requirement consists of the following: agency notification procedures; procedures to mitigate a release or threatened release; and evacuation plans and procedures. This material has not been provided.

You are directed to submit a Plan of Correction to this office by April 1, 1991. The plan shall specify the actions you will take to address each of the above violations and the dates by which these corrections will be implemented. It must include a statement on how you or the station manager will meet tank monitoring requirements. Blank underground tank permit application forms have been sent to you, and these must be completed and returned here. Finally, as indicated above, you are required to submit a Hazardous Materials Management Plan to this office, the blank form of which was also sent to you.

Please note that Sections 25298 and 25299 of the California Health and Safety Code authorize penalties of up to \$10,000 for each day that violations of underground tank regulations continue. <u>Because this is the third and final Notice of Violation to be issued for this site, your case will be referred to the Alameda County District Attorney's office for enforcement.</u>

If you have any questions about this letter, please contact the undersigned at (415) 271-4320.

Sincerely,

Gil Wistar

Hazardous Materials Specialist

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

Environmental Protection Division Rafat Shahid, Asst. Agency Director, Environmental Health files

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Certified Mailer # P 062 127 756

January 22, 1991

Mr. Murray Kelsoe P. O. Box 392

Alamo, CA 94507

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

SECOND NOTICE OF VIOLATION

Dear Mr. Kelsoe:

As stated to you in a September 19, 1990 letter, the Alameda County Department of Environmental Health, Hazardous Materials Division enforces provisions of state law pertaining to underground tanks within Alameda County. In September, we inspected your facility at I-580 and Grantline Rd., and found that you as the owner/operator needed to accomplish several tasks at this filling station in order to comply with state law. In the September 19 letter, we spelled out these deficiencies and required that you respond by October 19. By that date, there was no response, as a result of which this office sent you a Notice of Violation on November 13. So far, this office has still received nothing.

The filling station is in violation of the provisions of state law indicated below.

- 1. <u>Sec. 25298, CA Health and Safety Code</u> This section of code states that underground tanks must be permitted properly, or else removed according to state law. Your tanks have not been permitted, since there are no permit application forms on file.
- 2. Sec. 2712. Title 23, CA Code of Regulations The gasoline tanks on the premises are of single-wall construction, and, therefore require specific monitoring techniques; these usually consist of annual precision testing, daily inventory reconciliation, and automatic pipeline shutdown devices. Records of annual precision testing are not on file. In addition, there were no records of daily inventory reconciliation available to review on-site.
- 3. <u>Sec. 2644, Title 23</u> No quarterly reports summarizing inventory reconciliation for the three product tanks at Granada Exxon have been submitted to this office.
- 4. Sec. 25504(a), CA H&SC No emergency business plan has been submitted to this office. The business plan requires inventory information on all hazardous materials in quantities beyond specified thresholds. This list has not been provided.

Mr. Murray Kelsoe January 22, 1991 Page 2 of 2

5. Sec. 25504(b), CA H&SC - The business plan also requires emergency response plans and procedures in the event of a reportable release or a threatened release of a hazardous material or waste. At a minimum, this requirement consists of the following: agency notification procedures; procedures to mitigate a release or threatened release; and evacuation plans and procedures. This material has not been provided.

You are directed to submit a Plan of Correction to this office by February 15, 1991. The plan shall specify the actions you will take to address each of the above violations and the dates by which these corrections will be implemented. It must include a statement on how you or the station manager will meet tank monitoring requirements. Blank underground tank permit application forms have been sent to you, and these must be completed and returned to this office. Finally, as indicated above, you are required to submit an HMMP, or business plan, to this office, the blank form of which was also sent to you. (This form is designed to let us know what kinds and amounts of hazardous materials and wastes are stored at the facility, and what kinds of contingency plans are in place in the event of a spill, fire, or other chemical emergency.)

Please note that Sections 25298 and 25299 of the California Health and Safety Code authorize penalties of up to \$10,000 for each day that violations of underground tank regulations continue.

If you have any questions about this letter, please contact the undersigned at (415) 271-4320.

Sincerely, Albert M. Wiston

Gil Wistar

Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection Division
Rafat Shahid, Asst. Agency Director, Environmental Health files

Certified Mailer #P 062 128 117

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

November 13, 1990

Mr. Murray Kelsoe Altamont Pass Services 1288 West 11th St., #272 Tracy, CA 95376

NOTICE OF VIOLATION

Dear Mr. Kelsoe:

As stated to you in a letter dated September 19, the Alameda County Department of Environmental Health, Hazardous Materials Division enforces provisions of state law pertaining to underground tanks within Alameda County. In September, we inspected your facility at I-580 and Grantline Rd., and found that you as the owner/operator needed to accomplish several tasks at this filling station in order to comply with state law. In the September 19 letter, we spelled out these deficiencies and required that you respond by October 19. So far, this office has received nothing.

The filling station is in violation of the provisions of state law indicated below.

- 1. <u>Sec. 25298, CA Health and Safety Code</u> This section of code states that underground tanks must be permitted properly, or else removed according to state law. Your tanks have not been permitted, since there are no permit application forms on file.
- 2. Sec. 2712, Title 23, CA Code of Regulations The gasoline tanks on the premises are of single-wall construction, and, therefore require specific monitoring techniques; these usually consist of annual precision testing, daily inventory reconciliation, and automatic pipeline shutdown devices. Records of annual precision testing are not on file. In addition, there were no records of daily inventory reconciliation available to review on-site.
- 3. <u>Sec. 2644. Title 23</u> No quarterly reports summarizing inventory reconciliation for the three product tanks at Granada Exxon have been submitted to this office.
- 4. <u>Sec. 25504(a), CA H&SC</u> No emergency business plan has been submitted to this office. The business plan requires inventory information on all hazardous materials in quantities beyond specified thresholds. This list has not been provided.

Mr. Murray Kelsoe November 13, 1990 Page 2 of 2

5. Sec. 25504(b), CA H&SC - The business plan also requires emergency response plans and procedures in the event of a reportable release or a threatened release of a hazardous material or waste. At a minimum, this requirement consists of the following: agency notification procedures; procedures to mitigate a release or threatened release; and evacuation plans and procedures. This material has not been provided.

In accordance with Sec. 66328 of the CA Code of Regulations, please submit a Plan of Correction to this office within 30 days, or by December 14, 1990. The plan should specify the actions you will take to address each of the above violations and their expected dates of completion, including a statement on how you or the station manager will implement tank monitoring requirements. Blank underground tank permit application forms have been sent to you, and these must be completed and returned to this office. Finally, as indicated above, you are required to submit an HMMP, or business plan, to this office, the blank form of which was also sent to you. (This form is designed to let us as the administering agency know what kinds and amounts of hazardous materials and wastes are stored at the facility, and what kinds of contingency plans are in place in the event of a spill, fire, or other chemical emergency.)

If you have any questions about this letter, please contact the undersigned at (415) 271-4320.

Sincerely,

Gil Wistar

Albert M. Vista

Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection Division Rafat Shahid, Asst. Agency Director, Environmental Health files

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

September 19, 1990

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

Mr. Murray Kelsoe Altamont Pass Services 1288 West 11th St., #272 Tracy, CA 95376

RE: Filling station at I-580 and Grantline Rd., Tracy (Alameda County)

Dear Mr. Kelsoe:

The Alameda County Department of Environmental Health, Hazardous Materials Division enforces provisions of state law pertaining to underground tanks within Alameda County. Last week, we inspected your facility at the above address and found that you as the owner/operator must accomplish several tasks at this facility in order to comply with state law. These are indicated below.

Permit Application Forms

Enclosed are several blank underground tank permit application forms to be completed and returned to this office. Please fill these out fully, and note that only one "Part A" (blue) form need be completed, but that one "Part B" (brown) form must be filled out for <u>each tank</u> at the facility, whether currently in use or not. Also note that on Part B forms you must specify monitoring alternatives (see below).

Underground Tank Monitoring

Recently, I spoke with Gloria Grow, the manager of the facility, and explained to her the monitoring requirements for tanks. There are several alternatives provided for in Title 23 of the California Code of Regulations, but most service stations use a combination of <u>daily inventory reconcilation</u> and <u>annual precision tank testing</u>. Unless you choose another alternative, both of these monitoring techniques must be implemented immediately. Reporting requirements include sending to this office quarterly summaries of inventory reconciliation records and results of the annual precision tests. Precision tank testers must be licensed by the state of California.

Hazardous Materials Management Plan

Finally, you are required to submit an HMMP, or business plan, to this office. Enclosed is a blank form to be filled out. This is

Mr. Murray Kelsoe September 19, 1990 Page 2 of 2

designed to let us as the administering agency know what kinds and amounts of hazardous materials and wastes are stored at the facility, and what kinds of contingency plans are in place in the event of a spill, fire, or other chemical emergency.

Please submit the completed HMMP to this office within 30 days of the date of this letter, i.e., no later than October 19, 1990. By this same date, we are requiring that you submit completed copies of the underground tank permit application forms, as well as a statement of how you or the station manager will implement tank monitoring requirements.

If you have any questions about this letter, please contact the undersigned at (415) 271-4320.

Sincerely,

Thilbert M. Wiston

Gil Wistar

Hazardous Materials Specialist

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cc: Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection Division Rafat Shahid, Asst. Agency Director, Environmental Health files