

20 285



State Water Resources Control Board



Division of Financial Assistance

1001 I Street • Sacramento, California 95814

P.O. Box 944212 • Sacramento, California • 94244-2120

(916) 341-5757 • FAX (916) 341-5806 • www.waterboards.ca.gov/cwphome/ustcf

Arnold Schwarzenegger
Governor

Linda S. Adams
Secretary for
Environmental Protection

AUG 08 2007

Xtra Oil Company
Keith Or Ted Simas
2307 Pacific Ave
Alameda, CA 94501

FILED
AUG 8 2007
ENVIRONMENTAL HEALTH SERVICES

**REQUEST FOR PRE-APPROVAL OF CORRECTIVE ACTION COSTS,
CLAIM NO. 001068, PA # 5
SITE ADDRESS: 3495 CASTRO VALLEY BLVD, CASTRO VALLEY, CA 94546**

The Fund technical review staff has reviewed your request, received on June 29, 2007, for pre-approval of corrective action costs; these documents will be placed in your file for future reference.

Pursuant to Section 2811.4, subdivision (c), of the Cleanup Fund regulations and based upon the materials submitted, the Cleanup Fund must deny your request for pre-approval. You have failed to submit the required three bids for the tasks covered by your pre-approval request. Also, the proposal you provided for the task covered by your pre-approval request appears to be unreasonable for the scope of work. Based on the Cleanup Fund's experience with similar sites in your area, we have determined that **\$ 30,151** is reasonable for the tasks included in your pre-approval request. The breakdown of costs associated with each task is shown in Table 1 below.

There are two options available to you. You must secure the requisite bids for the tasks covered by the pre-approval request, and the Cleanup Fund will evaluate the reasonableness of the costs in light of the additional bids.

Or, you may resubmit the existing bid and request pre-approval for the amounts specified in Table 1. Since the Cleanup Fund has determined that the amount specified in Table 1 is reasonable for this scope of work, the three-bid requirement is unnecessary if you concur with the Cleanup Fund's determination. The Cleanup Fund has the authority to waive the three-bid requirement as unnecessary upon your request to do so. Therefore, if your resubmitted pre-approval request only seeks pre-approval for the amount the Cleanup Fund has determined reasonable (the amount specified in Table 1) and you request waiver of the three-bid requirement as unnecessary, the Cleanup Fund will grant your request for pre-approval and waive the three bid requirement, with respect to this scope of work, as unnecessary.

A waiver does not waive the three-bid requirement for the claim, but only for the tasks covered by the pre-approval request. Again, if you decide to seek waiver of the three-bid requirement because it is unnecessary, then you must provide a written request for waiver of the three-bid requirement and resubmit your pre-approval request seeking only the amounts specified in Table 1. In an effort to assist you in expediting the pre-approval process we have prepared the attached *Acceptance of Reasonable Cost/Request for Bid Waiver* form letter. If you concur/accept our reasonable cost determination and would like to request a bid waiver, then just sign and date the attached letter and return to us for further processing your Pre-Approval.

Table 1
REASONABLE COST BREAKDOWN

#	Task*	Reasonable Cost, \$	Comments/Changes
1	Permits	\$3,421	Copies of all permits must be submitted to the Fund at the time of reimbursement.
2	Field Equipment	\$1,705	Note: The requested cost of \$1,840 was reduced by \$135. Vehicle Charges are reimbursed at a rate of \$60 per day or \$0.50 per mile which ever is less.
3	Monitoring Well Installation	\$4,100	This cost includes all time and material for this task. Coordination and oversight hours were reduced from 48 hours to 38 hours @ \$90 per hour.
4	Monitoring Well Sampling (8 new & 6 existing wells)	\$2,100	This cost includes all time and material for this task. Coordination and oversight hours were reduced from 36 hours to 30 hours @ \$70 per hour.
5	Waste Disposal and Report	\$3,790	This cost includes all time and material for this task. Copies of all reports must be submitted to the Fund at the time of reimbursement. Note: The requested cost of \$6,510 for reporting appears to be excessive and unreasonable. \$3,510 is approved for the reporting task and \$280 for soil disposal coordination

#	Task*	Reasonable Cost, \$	Comments/Changes
6	Direct Cost - Driller, Permits, Analytical, Waste Disposal, Survey	\$15,035	This cost includes all time and material for this task. Well Bond cost \$6,000 not approved. Up-front monies, bonds, deposits, retainers, are not eligible for funding. The requested surveyor cost \$2,200 appears to be excessive. Typical cost for this task ranges from \$1,500 to \$1,700, thus \$500 is not approved for this task. Waste Disposal cost is pre-approved at a rate of \$155 per drum not \$225 per drums as requested. Copies of all sub-invoices and disposal manifests must be submitted at the time of reimbursement.
TOTAL Reasonable Cost		\$ 30,151	

* Task descriptions are the same as those identified in P&D Environmental, Inc.'s April 12, 2007 Cost Estimate

Should you decide to obtain the additional bids for satisfying the three-bid requirement, and if you need assistance in procuring contractor and consultant services for corrective action don't hesitate to call me at (916) 341-5757.

Sincerely,



Sunil Ramdass, Water Resources Control Engineer
Technical Review Unit
Underground Storage Tank Cleanup Fund

Enclosure

cc: Steven Plunkett
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

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

April 4, 2007

Mr. Edward Simas
Xtra Oil Co.
2307 Pacific Avenue
Alameda, CA 94552

Subject: Fuel Leak Case No. RO0000285, Extra Oil DBA Shell Station, 3495 Castro Valley Blvd.,
Castro Valley, CA. – Work Plan Approval

Dear Mr. Simas:

Alameda County Environmental Health (ACEH) staff have reviewed the case file and the recently submitted report entitled, "Groundwater Monitoring Well Installation Work Plan" prepared on your behalf by P&D Environmental (P & D). The scope of work as described in the Work Plan calls for the installation, sampling, development and survey of nine offsite groundwater monitoring wells. ACEH generally concurs with the scope of work as recommended in the Work Plan, provided the technical comments discussed below are incorporated before implementation of the Work Plan.

Based on ACEH staff review of the case file, we request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (<mailto:steven.plunkett@acgov.org>) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Monitoring Well Locations and Design.** P & D suggests installation of nine offsite groundwater monitoring wells in order to evaluate the extent of dissolved phase petroleum hydrocarbon contamination down gradient of your site. ACEH has reviewed the monitoring well locations proposed by P & D and determined that the following adjustments shall be made; MW-11 shall be moved to approximately 25 feet west/southwest of soil boring P39 and monitoring well MW-9 is not necessary at this time. Please revise figure 2 to reflect the changes in monitoring well locations. Please submit a revised figure 2 prior to the implementation of the Work Plan.

ACEH suggests the use of monitoring wells designed with filter pack intervals of 5 feet or less, as these wells will be representative of depth discrete groundwater conditions. Upon completion of the monitoring well installation ACEH request that you submit all well construction design details, technical specifications and well logs in the report requested below. In addition, we request that a licensed professional surveyor survey all the new monitoring well locations. ACEH requests that a site map be prepared showing the location of the former UST, all onsite buildings, new monitoring locations and any other site feature that may be pertinent. Please present the results from the monitoring well installation in the report requested below.

2. **Soil Sampling and Analysis.** The Work Plan makes the following confusing statements, "soil samples will be collected from the boreholes into brass tubes a maximum of five foot intervals, at changes in lithology and any areas of obvious contaminations" and "one soil samples will be retained from each borehole at the capillary fringe for laboratory analysis." ACEH requests soil samples be collected from soil borings at changes in lithology, areas of obvious hydrocarbon contamination or when elevated OVM readings occurs. If no changes in lithology, obvious contamination or elevated OVM reading occurs, soil samples shall be collected at the capillary fringe from all soil boring locations. ACEH with the soil sample analysis recommended by P & D. Please present results from soil sampling and analysis in the report requested below
3. **Groundwater Sample Analysis.** ACEH agrees with the groundwater sample analysis recommended by P & D. Please present results groundwater sampling and analysis in the report requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett), according to the following schedule:

- **May 15, 2007 – Monitoring Well Installation 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

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

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 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).

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) 383-1767.

Sincerely,



Steven Plunkett
Hazardous Materials Specialist

cc: Dave Gibbs
P & D Environmental
55 Santa Clara Avenue, Suite 240
Oakland, CA 94610

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

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

February 6, 2007

Mr. Edward Simas
Xtra Oil Co.
2307 Pacific Avenue
Alameda, CA 94552

Subject: Fuel Leak Case No. RO0000285, Extra Oil DBA Shell Station, 3495 Castro Valley Blvd.,
Castro Valley, CA.

Dear Mr. Simas:

Alameda County Environmental Health (ACEH) staff have reviewed the case file and the recently submitted report entitled, "Quarterly Groundwater Monitoring And Sampling Report (March 2006 through June 2006)" prepared on your behalf by P&D Environmental. Results from the quarterly groundwater monitoring indicate that elevated concentrations of fuel hydrocarbons continue to be detected in groundwater onsite, of particular concern are TPHg, benzene and MtBE at concentrations of up to 140,000 µg/L, 44,000 µg/L and 31,000 µg/L, respectively. Recently, onsite interim remedial measures have been implemented to reduce contamination in the source area and help mitigate the impacts of dissolved phase plume migration.

Soil and groundwater analytical data collected during previous investigative activities is discontinuous, and thus does not provide a comprehensive record of groundwater analytical data. Furthermore, review of the case file indicates that there are no groundwater monitoring wells off site to determine the extent of dissolved phase petroleum hydrocarbon contamination downgradient of your site. Therefore, ACEH requests you provide a work plan that details your proposal to install groundwater monitoring wells downgradient of your site. The installation of additional groundwater monitoring wells will help to characterize the extent of groundwater contamination downgradient of your site.

Based on ACEH staff review of the case file, we request that you address the following technical comments and prepare a work plan detailing work to be performed, and send us the reports described below. Please provide 72-hour advance written notification to this office (<mailto:steven.plunkett@acgov.org>) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Regional Groundwater Flow Direction.** Review of the groundwater elevation data in the area indicate that groundwater flow direction may not be consistent with the groundwater flow direction identified in the current ground monitoring report dated June 29, 2006. Our review of regional groundwater data indicates that groundwater flow direction is more likely south-southeast. The lack of offsite downgradient monitoring wells to confirm the groundwater flow direction is data gap that must be evaluated to accurately determine the hydraulic gradient

direction is data gap that must be evaluated to accurately determine the hydraulic gradient for your site. Please prepare a detailed work plan, in the report requested below, and discuss your rationale for monitoring well locations and well construction and determining groundwater flow direction and dissolved phase petroleum hydrocarbon plume delineation.

2. **Monitoring Well Installation.** ACEH suggests the use of monitoring wells designed with filter pack intervals of 5 feet or less, as these wells will likely be representative of depth discrete groundwater conditions. Upon completion of the monitoring well installation ACEH requests that you submit all well construction details, technical specifications and well lithologic logs in the report requested below. In addition, we request that a licensed professional surveyor survey the monitoring well location. ACEH requests that a site map be prepared showing the location of the former UST, all onsite buildings, new monitoring locations and any other site feature that may be pertinent.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett), according to the following schedule:

- **March 15, 2007** – Work Plan for Offsite Investigation and Monitoring Well Installation

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

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

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 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).

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

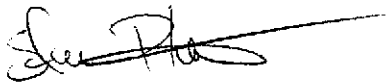
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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) 383-1767.

Sincerely,



Steven Plunkett
Hazardous Materials Specialist

cc: Mr. Paul King
55 Santa Clara Avenue, Suite 240
Oakland, CA 94610

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

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

May 29, 2006

Mr. Edward Simas
Xtra Oil Co.
2307 Pacific Avenue
Alameda, CA 94552

Subject: Fuel Leak Case N [REDACTED] Xtra Oil DBA Shell Station, 3495 Castro Valley Blvd.,
Castro Valley, California.

Dear Mr. Simas:

Please be advised that I have taken over the above referenced site from Mr, Amir Ghloami. Alameda County Environmental Health (ACEH) staff have reviewed the case file and the recently received reports entitled, "Interim Source Area Remediation Plan" and "Quarterly Groundwater Monitoring And Sampling Report (December Through February 2006)" prepared on your behalf by P&D Environmental. In addition to the report requested below, a Site Conceptual Model (SCM) is requested to present the site background, history, geology, hydrogeology, hypotheses for contaminant migration, and investigation results to date for the site. The SCM also presents conclusions and recommendations for future actions. Results from the February 2006 quarterly groundwater monitoring indicate that elevated concentrations of fuel hydrocarbons continue to be detected in groundwater both on and off-site, of particular concern are TPHg, benzene and MtBE concentrations. ACEH agrees with the need for interim remediation in the source area as proposed by P&D Environmental.

Based on ACEH staff review of the case file, we request that you address the following technical comments and prepare a work plan detailing work to be performed, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Proposed Interim Source Area Remedial Alternative.** ACEH concurs with the need for interim source area remediation. The purpose of source area migration control is to prevent dissolved phase petroleum hydrocarbon migration off site. The conversion of monitoring well EW1 adjacent to the UST tank pit to a groundwater extraction well is acceptable. ACEH recommends that water level data collection be performed using down-hole pressure transducers appropriately calibrated and programmed, thus data will be collected in systematic and consistent manner. In addition, we suggest the use of an interface water level probe when measuring free product thickness.
2. **Regional Groundwater Flow Direction.** Review of the groundwater elevation data in the area indicate the groundwater flow direction may not be consistent with the groundwater flow direction identified in the current ground monitoring report dated March 13, 2006. ACEH's

review of regional groundwater data indicates that groundwater flow direction is more likely south-southeast. Please review regional groundwater data for the site and any other available groundwater elevation data and revise the groundwater flow direction accordingly.

3. Project Approach and Investigation Reporting – Site Conceptual Model

We anticipate that characterization and remediation work in addition to what is requested in this letter will be necessary at and downgradient from your site. Considerable cost savings can be realized if your consultant focuses on developing and refining a viable Site Conceptual Model (SCM) for the project. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point, the SCM is said to be "validated." The validated SCM then forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

When performed properly, the process of developing, refining and ultimately validating the SCM effectively guides the scope of the entire site investigation. We have identified, based on our review of existing data, some initial key data gaps in this letter and have described several tasks that we believe will provide important new data to refine the SCM. **We request that your consultant develop a SCM for this site, identify data gaps, and propose specific supplemental tasks for future investigations.** There may need to be additional phases of investigations, each building on the results of the prior work, to validate the SCM. Characterizing the site in this way will improve the efficiency of the work and limit its overall cost.

The SCM approach is endorsed by both industry and the regulatory community. Technical guidance for developing SCMs is presented in API's Publication No. 4699 and EPA's Publication No. EPA 510-B-97-001 both referenced above; and "Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Appendix C," prepared by the State Water Resources Control Board, dated March 27, 2000.

The SCM for this project shall incorporate, but not be limited to, the following:

- a) A concise narrative discussion of the regional geologic and hydrogeologic setting obtained from your background study. Include a list of technical references you reviewed, and copies (photocopies are sufficient) of regional geologic maps, groundwater contours, cross-sections, etc.
- b) A concise discussion of the on-site and off-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to downgradient and above-ground receptors. Be sure to include the vapor pathway in your analysis. Maximize the use of large-scale graphics (e.g., maps, cross-sections, contour maps, etc.) and conceptual diagrams to illustrate key

points. Include structural contour maps (top of unit) and isopach maps to describe the geology at your site. Geologic cross-sections, which include an interpretive drawing of the vertical extent of soil and groundwater contamination (i.e., an interpretive drawing—not a plot of laboratory results). The SCM report requested below is to include one cross section parallel and one cross section perpendicular to the contaminant plume axis. Each cross section should include, but not be restricted to, the following:

1. Subsurface geologic features, depth to groundwater and man-made conduits.
 2. Surface topography. The cross sections should be extended off-site where necessary to show significant breaks in slope.
 3. Soil descriptions for all borings and wells along the line of section.
 4. Screen and filter pack intervals for each monitoring well.
 5. Sampling locations and results for soil and grab groundwater samples.
 6. Site features such as the tank pit, dispensers, etc. Where appropriate, monitoring well location and soil boring locations will be projected back to the strike of the cross section line
- c) Identification and listing of specific data gaps that require further investigation during subsequent phases of work.
- d) Proposed activities to investigate and fill data gaps identified above.
- d) The SCM shall include an analysis of the hydraulic flow system at and downgradient from the site. Include rose diagrams for groundwater gradients. The rose diagram shall be plotted on groundwater contour maps and updated in all future reports submitted for your site. Include an analysis of vertical hydraulic gradients. Note that these likely change due to seasonal precipitation and pumping.
- e) Temporal changes in the plume location and concentrations are also a key element of the SCM. In addition to providing a measure of the magnitude of the problem, these data are often useful to confirm details of the flow system inferred from the hydraulic head measurements. Include plots of the contaminant plumes on your maps, cross-sections, and diagrams.
- f) Several other contaminant release sites exist in the vicinity of your site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for your SCM. Include a summary of work and technical findings from nearby release sites and incorporate the findings from nearby site investigations into your SCM.
- g) Plots of chemical concentrations vs. time and vs. distance from the source. Plots should be shown for each monitoring well, which has had detectable levels of contaminants
- h) Summary tables of chemical concentrations in each historically sampled media (including soil, groundwater and soil vapor).
- i) Boring and well logs (including construction/screening), and a summary table indicating construction specifications for each monitoring and extraction well.

Report the information discussed above in your initial SCM and include it in the Work Plan requested below. Include updates to your SCM in the Soil and Water Investigation (Results of Expedited Site Assessment) Report requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett), according to the following schedule:

- **June 15, 2006** – Revised Interim Remediation Work Plan
- **July 15, 2006** – Site Conceptual Model, with work plan for next phase of work
- **September 15, 2006** – Quarterly Groundwater Monitoring Report Third Quarter 2006
- **December 15, 2006** – Quarterly Groundwater Monitoring Report Fourth Quarter 2006
- **March 15, 2007** – Quarterly Groundwater Monitoring Report First Quarter 2007
- **June 15, 2007** – Quarterly Groundwater Monitoring Report Second Quarter 2007

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

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

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 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

Mr. Edward Simas
May 12, 2006
Page 5

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).

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

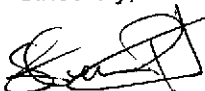
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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) 383-1767.

Sincerely,



Steven Plunkett
Hazardous Materials Specialist

Mr. Edward Simas
May 12, 2006
Page 6

cc: Mr. Paul King
55 Santa Clara Avenue, Suite 240
Oakland, CA 94610

Donna Drogos, ACEH
Steven Plunkett, ACEH
File

P & D ENVIRONMENTAL

A Division of Paul H. King, Inc.
4020 Panama Court
Oakland, CA 94611
(510) 658-6916

FAX TRANSMITTAL COVER SHEET

Date: 9/10/03

Job #: 0014

From: ~~To:~~ Scott Seery

Company: ACDFH

To: ~~from:~~ Willy Welzenbach
P&D ENVIRONMENTAL

Number of pages in this transmittal, including this cover sheet: 3

SUBJECT: Well Records Request - 3495 Castro Valley Blvd

MESSAGE: Attached you will find the Well Completion Report + Release Agreement (2 pgs) for the subject site.

Please complete the lower right section & fax the Agreement back to us.

If transmittal is incomplete, please call (510) 658-6916
P&D Environmental fax number: (510) 834-0772

DESTINATION FAX NUMBER: 510-337-9335

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
973	510 834 0772	07-25 16:35	02' 49	07/07	OK		

7499402046

**ALAMEDA COUNTY
HEALTH CARE SERVICES**



AGENCY
DAVID J. KEARS, Agency Director

RO0000285

July 24, 2003

Keith Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(415) 527-6200

Post-it® Fax Note	7671	Date	7/25	# of pages	7
To	Paul King	From	S. Saary		
Co./Dept.	P&D Env.	Co.	ACEH		
Phone #	834-0772	Phone #	510/567-6783		
Fax #	650-8074	Fax #			

35

RE: SWI, SCM, ISARP and CAP for Xtra Oil Company Station dba Shell Station, 3495 Castro Valley Blvd., Castro Valley

Dear Mr. Simas:

This letter follows a review of the historic fuel leak case file for the above referenced site and the July 11, 2003 meeting with your consultant, Mr. Paul King of P&D Environmental (P&D). This office is concerned with the continued presence of highly elevated concentrations of gasoline and diesel compounds in groundwater sampled from on-site wells, as well as in samples collected from sampling points as far as 700' from the site. We are concerned with the elevated concentrations of the fuel oxygenates Methyl tert-Butyl Ether (MtBE) and tert-Butyl Alcohol (TBA), and the continued accumulation of measurable free-phase product (FP) in one monitoring well at the site. We are also concerned that the mechanisms controlling the migration of fuel releases away from the site and towards more sensitive receptors are not yet well understood, including the potential presence of preferential flow pathways, both geogenic and anthropogenic.

This letter presents a request to complete a Soil and Water Investigation (SWI), Site Conceptual Model (SCM), and prepare an Interim Source-Area Remediation Plan (ISARP) and Corrective Action Plan (CAP) for the subject site in accordance with California Code of Regulations (CCR), Title 23, Division 3, Chapter 16, Article 11, "Corrective Action Requirements"; State Water Resources Control Board Resolution 9249, "Policies and Procedure for Investigation, Cleanup and Abatement of Discharges Under Water Code Section 13304"; and the Regional Water Quality Control Board (Regional Board) Water Quality Control Plan for the basin.

The following technical comments address investigation and related performance objectives that shall be

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO0000285

July 24, 2003

Keith Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

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

RE: SWI, SCM, ISARP and CAP for Xtra Oil Company Station dba Shell Station, 3495 Castro Valley Blvd., Castro Valley

Dear Mr. Simas:

This letter follows a review of the historic fuel leak case file for the above referenced site and the July 11, 2003 meeting with your consultant, Mr. Paul King of P&D Environmental (P&D). This office is concerned with the continued presence of highly elevated concentrations of gasoline and diesel compounds in groundwater sampled from on-site wells, as well as in samples collected from sampling points as far as 700' from the site. We are concerned with the elevated concentrations of the fuel oxygenates Methyl tert-Butyl Ether (MtBE) and tert-Butyl Alcohol (TBA), and the continued accumulation of measurable free-phase product (FP) in one monitoring well at the site. We are also concerned that the mechanisms controlling the migration of fuel releases away from the site and towards more sensitive receptors are not yet well understood, including the potential presence of preferential flow pathways, both geogenic and anthropogenic.

This letter presents a request to complete a Soil and Water Investigation (SWI), Site Conceptual Model (SCM), and prepare an Interim Source-Area Remediation Plan (ISARP) and Corrective Action Plan (CAP) for the subject site in accordance with California Code of Regulations (CCR), Title 23, Division 3, Chapter 16, Article 11, "Corrective Action Requirements"; State Water Resources Control Board Resolution 9249, "Policies and Procedure for Investigation, Cleanup and Abatement of Discharges Under Water Code Section 13304"; and the Regional Water Quality Control Board (Regional Board) Water Quality Control Plan for the basin.

The following technical comments address investigation and related performance objectives that shall be considered as part of the required SWI, SCM, ISARP and CAP. **We request that you prepare and submit a work plan for the SWI that addresses each of the following comments.**

TECHNICAL COMMENTS

1. Preferential Pathway Study

We understand that a utility location study was completed by P&D in preparation for one or more phase of off-site push-tool investigation. However, we also understand that this work did not directly evaluate whether such utilities could act as conduits for influencing plume migration. Consequently, a conduit / preferential pathway study shall be prepared for the site that identifies potential migration pathways and conduits (utilities, storms drains, etc.) that may be present in the general vicinity of the site. This survey must include, among other components, the submittal of comprehensive map(s) clearly showing the

Mr. Simas
Re: 3495 Castro Valley Blvd. Castro Valley
July 24, 2003
Page 2 of 7

location and depth of all utility lines and trenches identified in the study, utility/trench slope or grade, flow directions, backfill materials present, and how such characteristics may or may not affect plume dispersal from the site.

You shall also identify the presence of all wells within a ¼ mile radius of the site (i.e., monitoring and production wells; active, inactive, standby, destroyed, abandoned).

Using the results of the conduit / preferential pathway study, tank operational histories and records, and data from previous investigations at the site, you are to develop the initial three-dimensional *Site Conceptual Model* (SCM) of site conditions. You are to use this initial SCM to determine the appropriate configuration for sampling points in the SWI phase of work at this site. Discuss your analysis and interpretation of the results of the conduit study and explain your rationale for the configuration of sampling points in the SWI work plan.

2. Site Conceptual Model

Starting with a critical review of the pending conduit study, data from previous investigations and tank operational records for this site, followed by an evaluation of regional and area-specific geology and hydrogeology based on published U.S. Geological Survey and California Geological Survey reports, as well as other reports published for similar site investigations or public works projects in the general vicinity of the site, you are to develop the initial three-dimensional SCM of site conditions. You should include in the SCM a series of cross-sections drawn along transects both normal to and along the axes of both lobes of the contaminant plume to illustrate your interpretation of underlying geology, the locations of utility corridors and trenches, and other salient features.

A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point the SCM is considered "validated". The validated SCM forms the foundation for developing the most cost-effective final Corrective Action Plan (CAP).

Your attention is directed to "*Strategies for Characterizing Subsurface Releases of Gasoline Containing MtBE*", American Petroleum Institute Publication No. 4699 dated February 2000 as a resource for development of the SCM. Your attention is also directed to the State Water Resources Control Board (SWRCB) "*Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Final Draft*", dated March 27, 2000, as well as the June 2002 ChevronTexaco Energy Research and Technology Company technical bulletin entitled "*Mass Flux Estimates to Assist Decision-Making*" to help in development and strategies for refinement of the SCM, among other related tasks. I can provide copies of any of these documents if you need them.

You are requested to use this initial SCM and referenced guidance documents to help you determine the appropriate configuration for samplings points in the pending SWI phase of work at this site. Please discuss in the SWI workplan your analysis and interpretation of the results of the conduit study and SCM, and explain your rationale for the configuration of proposed sampling points.

3. Contaminant Plume Definition – Soil and Groundwater

The purpose of contaminant plume definition is to determine the *three-dimensional* extent of contamination in soil and groundwater, including a determination of 3-D extent of impacts in the source area(s) and released contaminant mass, and a demarcation of potential geogenic and anthropogenic flow pathways. As you know, up to 21,000 parts per billion (ppb) MtBE, 29,000 ppb Benzene and 96,000 ppb Total Petroleum Hydrocarbons as gasoline (TPH-g) were detected in samples collected from well MW3 as recently as June 2003. Further, a reported ~ 4.4' thick layer of apparent diesel FP was measured in well MW4 as recently as December 2002. Measurable FP has been identified in this well for over 3 years. Product "sheen" is regularly seen in wells MW1 and MW3.

Based on published logs for wells MW1 through MW4 and borings SB1 through SB3, sediments encountered at the site are described as primarily silt (ML) and clay (CL) to the total depth explored (~20' below grade [bg]). Clays are described with varying amounts of silt; silts are described with varying amounts of clay and/or sand. Distinct stringers or lenses of sand are not described. Groundwater was reportedly encountered at depths of 12-15' bg, stabilizing between 8 and 10' bg in specific wells. Subjective evidence of hydrocarbon impacts noted during drilling was reportedly greatest at the approximate 10' depth. Laboratory analyses of soil samples collected at that depth substantiated field observations.

Between February 1994 and June 2001, forty-four (44) push-tool borings were completed in off-site locations in an attempt to identify the extent of groundwater impacts. Borings were emplaced in apparent up-, cross- and down-gradient locations. This work revealed a plume that appears bifurcated, with one lobe of the plume trending in a southeasterly direction from the site, and another lobe – the longer of the two – trending towards the southwest. Near the terminus, and situated between the two lobes, appears a distinct area where no detectable fuel compounds were discovered in sampled groundwater.

Sample data seem to suggest that the eastern lobe is comprised predominantly of diesel-range compounds, whereas the western lobe appears predominantly comprised of gasoline-range compounds. Distinct FP is noted as far as ~500' away from the site within the western lobe; product "sheen" is also identified in numerous locations along both lobes of the plume. Groundwater impacts are identified up to ~700' from the site. The actual extent of the western lobe impacts has not been determined.

In June 1998, two piezometers (OW1, OW2) were installed within the sanitary sewer trench running down the center of Redwood Road. Subjective evidence of petroleum impacts was noted at the time of their installation, as well as during one of at least three subsequent water level monitoring events. No water samples were reportedly collected during these monitoring events.

Further assessment is necessary to better understand site geology and hydrogeology, determine the mode of contaminant transport to such great distances from the site, and to refine the SCM. We therefore request a three-dimensional investigation. The vertical and horizontal distribution of impacts is to be determined. Mass-balance calculations are to be completed for the source area. Transects of sampling points across and along the plume axes are anticipated. The SWI work plan should present your plan to accomplish these tasks.

Conventional investigation techniques and monitoring well networks currently used at fuel leak sites are generally insufficient to adequately characterize modern fuel impacts, including those caused by MtBE and other oxygenates. It is recommended that your investigation initially incorporate expedited site assessment techniques and borings. The borings are to be continuously cored and logged, with close attention paid to changes in lithologies that might facilitate solute transport (e.g., silty/sandy stringers in otherwise fine grained sediments).

Soil samples should be collected for laboratory analysis at 5-foot intervals, areas of obvious contamination, the soil/groundwater interface, and at each lithologic change noted during boring advancement, at a minimum. Water samples are to be collected at discrete depths to total depth explored. Detailed cross-sections, fence diagrams, structural contours and isopachs, and rose diagrams for groundwater flow (incorporating all groundwater data), should be subsequently incorporated into the *Interim* and *Final* SWI reports, as appropriate. Cross-sections should be scaled to clearly illustrate subsurface lithologies, including the locations of stringers and other zones of relatively higher permeability, particularly in those areas where such zones may be intercepted by buried utilities.

Final well locations and screen depths will be substantially based on the results of the SWI and refined SCM. The monitoring of multiple discrete water-bearing zones with short-screened intervals is anticipated, and fully dependent upon what is found during the SWI. Generally, these screened intervals should not be greater than 3' in length. We will expect that the Interim SWI Report will propose the locations of such wells, the anticipated well screen depths, their configurations (e.g., single well, well cluster or multi-level, as appropriate), and the reasoning behind the location and configuration of each.

Discuss your proposal for performing this work outlined, above, in the SWI work plan. The results of the conduit study, and the initial SCM, are to be discussed in the SWI work plan to justify your proposed scope of work.

Expedited site assessment tools and methods are a scientifically valid and cost-effective approach to fully define the three-dimensional extent of the plume. Technical protocol for expedited site assessments are provide in the US EPA "*Expedited Site Assessment Tools for Underground Storage Tank Sites: A guide for Regulators*" (EPA 510-B-97-001), dated March 1997.

4. Interim Source-Area Remediation Plan

Measurable FP has consistently accumulated in well MW4 since early 2000, measuring up to ~ 4.4' thick as recently as December 2002. P&D reports that this product appears to be diesel fuel. In addition, product "sheen" has also been noted in well MW1 and MW3 for many years. Based on recent tank inspections conducted by this office, one or more of the active underground storage tanks (UST) have been overfilled since at least 2001. We do not know whether these events have resulted in additional product releases into the environment. However, Health and Safety Code Section 25295.5(a) defines an "overfill" as constituting an *unauthorized release*.

Currently an absorbent sock is used in MW1, and periodically replaced. We also understand that a passive hydrocarbon collection device is used in well MW4. This device is emptied periodically of product, and the unit adjusted to match groundwater depths and maximize product collection. A reporting of total product recovered has not been provided to this office to date.

Mr. Simas
Re: 3495 Castro Valley Blvd. Castro Valley
July 24, 2003
Page 5 of 7

The current FP removal practices do not appear to be adequate to remove FP to the maximum extent practicable, as required by Sec. 2655(a), Title 23, California Code of Regulations, and provide sufficient control to prevent continued migration of pollutants from the site. You are therefore requested to evaluate other FP recovery and plume control methods and develop an ISARP for submittal and quick implementation once approved by this office. We recognize that aquifer tests will be necessary to fully evaluate technologies that might be effective at this site. This work should be scheduled promptly.

In addition, you are requested to maintain a log on which is recorded for each monitoring period 1) the amount of FP measured in each well, 2) the quantity of FP removed from each well during each reporting period, and 3) the total FP removed to date. These data are to be presented in a tabulated format in each quarterly report.

5. Corrective Action Plan

The purpose of the CAP is to use the information obtained during investigation activities to propose cost-effective **final cleanup objectives and remedial alternatives for both soil and groundwater impacts, including those caused by MtBE and other fuel oxygenates**, that will adequately protect human health and safety, the environment, eliminate nuisance conditions, and protect water resources.

A final CAP for the soil and groundwater impacts caused by an unauthorized release at the site will be requested upon completion of the SWI in accordance with the schedule specified below. The CAP shall address at least two technically and economically feasible methods to restore and protect beneficial uses of water and to meet the cleanup objectives for each contaminant established in the CAP. The CAP should incorporate both on-site and distal plume corrective action elements. The CAP must propose verification monitoring to confirm completion of corrective actions and evaluate CAP implementation effectiveness.

ADDITIONAL COMMENTS

Well EW1, constructed adjacent to both the previous and current UST excavations following the 1992 tank replacements, was originally intended to facilitate eventual site remediation. This well has not been sampled since February 1993. Sampling of this well shall be reinstated on a quarterly schedule. Should FP be present within this well, it shall be removed to the extent practicable, as dictated by the ISARP.

Observation piezometers OW1 and OW2 have not been sampled since their installation in 1998, nor monitored since November 2000. These piezometers shall be sampled and monitored on a quarterly schedule.

Analytical, and depth-to-water and water elevation data presented in quarterly reports are currently not tabulated in a way that eases review. We request that data tables presented in all future reports be formatted such that cumulative data for each individual well is presented together so that the entire data history for each well may be evaluated quickly. Data tables for analytical results are to include, in addition to TPH and BTEX, total oxygenates and lead scavengers, as appropriate.

Mr. Simas
Re: 3495 Castro Valley Blvd. Castro Valley
July 24, 2003
Page 6 of 7

TECHINICAL REPORT REQUEST

Please submit technical reports according to, or otherwise comply with, the following schedule:

September 24, 2003 – Site Conceptual Model, including the results of the Preferential Pathway Study

September 24, 2003 – Work plan for Soil and Water Investigation

September 24, 2003 – Interim Source-Area Remediation Plan

45 Days from ISARP Approval – Implementation of ISARP

60 Days from SWI Work Plan Approval – Interim Soil and Water Investigation Report (which contains the results of the initial SWI assessment work, and a proposal for the installation of new monitoring wells)

90 Days from Completion of Soil and Water Investigation – Soil and Water Investigation Completion Report (which incorporates all data generated during completion of SWI, including the installation of the new monitoring wells)

90 Days after Submittal of Soil and Water Investigation Completion Report - Corrective Action Plan

October 15, 2003 – Quarterly Report for the Third Quarter 2003

January 15, 2004 – Quarterly Report for the Fourth Quarter 2003

April 15, 2004 – Quarterly Report for the First Quarter 2004

July 15, 2004 – Quarterly Report for the Second Quarter 2004

These reports and work plans are being requested pursuant to the Regional Board's authority under Section 13267(b) of the California Water Code. **Each technical report shall include conclusions and recommendations for the next phases of work required at the site should more appear necessary to refine the SCM.** We request that all required work be performed in a prompt and timely manner, as suggested by the noted schedule, above. Revisions to this schedule shall be requested in writing with appropriate justification for anticipated delays.

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that all work plans and technical reports containing professional geologic or engineering evaluations and/or judgments be completed under the direction of an appropriately registered or certified professional. This registered or certified professional shall sign and wet stamp all such reports and work plans.

All reports and work plans are to be submitted under cover, signed under penalty of perjury, by the Responsible Party(ies) who have taken a lead role in compliance with corrective action directives.

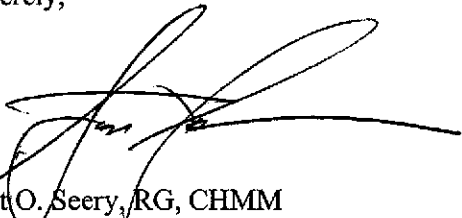
Mr. Simas
Re: 3495 Castro Valley Blvd. Castro Valley
July 24, 2003
Page 7 of 7

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 Alameda County District Attorney, for possible enforcement follow up. Enforcement follow up may include administrative action or monetary penalties of up to \$10,000 per day for each day of violation of the California Health and Safety Code, Division 20, Chapter 6.76.

If you have any questions, I can be reached at (510) 567-6783.

Sincerely,



Scott O. Seery, RG, CHMM
Hazardous Materials Specialist

c: Betty Graham, RWQCB
Dave Charter, SWRCB UST Fund
Paul King, P&D Environmental, 4020 Panama Ct., Oakland, CA 94611
D. Drogos, R. Weston

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



20285
SWOT

November 18, 2002

PR0500923

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

Keith Simas
Environmental Manager
Xtra Oil Company
2307 Pacific Avenue
Alameda, California 94501

NOTICE OF VIOLATION

Re: Inspection of Xtra Oil, 3495 Castro Valley Boulevard, Castro Valley, California 94546

Dear Mr. Simas:

A regulatory compliance inspection was performed at the subject Xtra Oil facility on November 13, 2002. The Xtra Oil Company owns and operates the subject facility. Technicians from Central Petroleum Maintenance facilitated the inspection. The purpose of the inspection was to determine compliance with conditions of the facility underground storage tank (UST) operating permit, as well as provisions of Title 23, California Code of Regulations (CCR) and California Health and Safety Code (HSC) Chapter 6.7.

The following is a summary of non-compliant and other conditions noted at the time of the inspection:

- Tank leak detection records from the Veeder Root TLS 350 monitoring console indicate a pattern of filling the tanks past the allowable limit of 95% of tank capacity. The overfill alarm is programmed at 95% of tank capacity. An overfill event which triggered an alarm means that the tank was filled past 95%. The law prohibits filling past 95% with the installed equipment. According to the printout, Tank 1, regular gasoline, was filled past 95% on three occasions in calendar year 2002. Tank 4, diesel was overfilled on May 13, 2001. The overfilling may have resulted in an unauthorized release.
- Documentation of alarm conditions indicated by the monitoring console is either incomplete or non-existent. A record is required to be created for each alarm that indicates a possible unauthorized release. Examples of alarms requiring documentation include turbine piping sump leak alarm, dispenser containment high lever and an annular space sensor alarm.

During our meeting to discuss the cause of the overfill alarms you stated that you had no knowledge of the alarms indicated as overfills. You explained the alarms as the fault of the delivery truck drivers for overfilling the tanks and then silencing the alarm and taking the alarm printout from the monitoring console without your knowledge. As the owner/operator of the USTs Xtra Oil Company is ultimately responsible for compliance with the permit conditions and proper management of the tanks.

Include in your response to this violation a complete written procedure to describe actions to be taken by your facility staff to prevent the loss of the alarm information. Additionally, include steps to be taken by the fuel terminal to ensure a proper delivery is made to your stations.

Violations of provisions of the HSC and CCR have been identified, as follows:

HSC Sec. 25292.1(a) – The underground storage tanks T 1, T4 have been filled with petroleum past 95% of the tank capacity. The dates of the overfill alarms are printed out from the memory of the monitoring console. It is a violation of the HSC to overfill the tanks. An unauthorized release may have occurred as a result of this mismanagement.

HSC Sec. 25299(a) provide for civil liabilities imposed on the tank operator of up to \$5000 per tank per day per violation for:

- (2) Violation of any applicable requirement of the permit
- (6) Violation of any applicable requirements of HSC Chapter 6.7

HSC Sec. 25299(b) provides for civil liabilities imposed on the tank owner of up to \$5000 per tank per day per violation for:

- (4) Knowing failure to take reasonable and necessary steps to assure compliance with HSC Chapter 6.7 by the operator
- (5) Violation of any applicable requirement of the permit issued for operation of the underground tank system
- (6) Violation of any applicable requirements of HSC Chapter 6.7

HSC Sec. 25293 – The operator of the underground tank system shall maintain records in sufficient detail to enable this office to determine that the underground tank system is in compliance with the permit conditions. Records of alarms are not being kept in sufficient detail for compliance with the permit conditions.

Please be advised that HSC Sec. 25299(a) provides for civil liabilities imposed on the tank operator of up to \$5000 per tank per day per violation for:

- (3) Violation of any applicable requirement of the permit
- (7) Violation of any applicable requirements of HSC Chapter 6.7

Please be further advised that HSC Sec. 25299(b) provides for civil liabilities imposed on the tank owner of up to \$5000 per tank per day per violation for:

Xtra Oil
Castro Valley Station
November 18, 2002
Page 3 of 3

- (4) Knowing failure to take reasonable and necessary steps to assure compliance with HSC Chapter 6.7 by the operator
- (5) Violation of any applicable requirement of the permit issued for operation of the underground tank system
- (6) Violation of any applicable requirements of HSC Chapter 6.7

At this time, you are required to correct the tank system operation and maintenance issues identified in this inspection report, namely:


- Correct the operational problems identified during the November 13, 2002 inspection.

Pursuant to HSC Sec. 25288(d), you are required to submit a *Plan of Correction* within 60 days. This plan shall indicate the tasks to be completed, or those that have been completed already, and the schedule for doing so.

You must certify, once all the necessary repairs and other tasks have been completed, that the tank system is in full compliance with HSC Chapter 6.7 and UST regulations.

Please contact me at (510) 567-6781 should you have any questions about the content this letter.

Sincerely,



Robert Weston
Senior Hazardous Materials Specialist

Enclosures

Cc: Susan Hugo, Manager, ACDEH
~~Dennis Drogos, LCR Manager, ACDEH~~
Susan Torrence, Assistant District Attorney, Alameda County District Attorney's Office
Leslie Alford, State Water Resources Control Board, Clean Water Program
Shahla Farahnak, State Water Resources Control Board, Clean Water Program

SYSTEM SETUP

NOV 13. 2002 9:02 AM

SYSTEM UNITS
U.S.
SYSTEM LANGUAGE
ENGLISH
SYSTEM DATE/TIME FORMAT
MON DD YYYY HH:MM:SS XM

3495 CASTRO VALLEY
510-537-7045

SHIFT TIME 1 : 6:00 AM
SHIFT TIME 2 : DISABLED
SHIFT TIME 3 : DISABLED
SHIFT TIME 4 : DISABLED

TANK PER TST NEEDED WRN
DISABLED
TANK ANN TST NEEDED WRN
DISABLED

LINE RE-ENABLE METHOD
PASS LINE TEST

LINE PER TST NEEDED WRN
DISABLED
LINE ANN TST NEEDED WRN
DISABLED

PRINT TC VOLUMES
ENABLED

TEMP COMPENSATION
VALUE (DEG F) : 60.0
STICK HEIGHT OFFSET
DISABLED

H-PROTOCOL DATA FORMAT
HEIGHT

DAYLIGHT SAVING TIME
ENABLED

START DATE
APR WEEK 1 SUN
START TIME
2:00 AM
END DATE
OCT WEEK 6 SUN
END TIME
2:00 AM

RE-DIRECT LOCAL PRINTOUT
DISABLED

EURO PROTOCOL PREFIX
S

SYSTEM SECURITY
CODE : 000000

COMMUNICATIONS SETUP

PORT SETTINGS:

IN-TANK SETUP

T 1:REGULAR
PRODUCT CODE : 1
THERMAL COEFF : .000700
TANK DIAMETER : 92.00
TANK PROFILE : 4 PTS
FULL VOL : 11527
69.0 INCH VOL : 9604
46.0 INCH VOL : 6023
23.0 INCH VOL : 2361

FLOAT SIZE: 4.0 IN.

WATER WARNING : 1.5
HIGH WATER LIMIT: 2.0

MAX OR LABEL VOL: 11527

~~OVERFILL LIMIT~~ : 10950
HIGH PRODUCT : 90%
DELIVERY LIMIT : 10374
DELIVERY LIMIT : 30%
DELIVERY LIMIT : 3458

LOW PRODUCT : 500
LEAK ALARM LIMIT: 50
SUDDEN LOSS LIMIT: 50
TANK TILT : 1.00

MANIFOLDED TANKS
T#: NONE

LEAK MIN PERIODIC: 10%
LEAK MIN PERIODIC : 1152

LEAK MIN ANNUAL : 10%
LEAK MIN ANNUAL : 1152

PERIODIC TEST TYPE
STANDARD

ANNUAL TEST FAIL
ALARM DISABLED

PERIODIC TEST FAIL
ALARM DISABLED

GROSS TEST FAIL
ALARM DISABLED

ANN TEST AVERAGING: OFF
PER TEST AVERAGING: OFF

TANK TEST NOTIFY: OFF

TNK TST SIPHON BREAK:OFF

DELIVERY DELAY : 5 MIN

T 2:PLUS
PRODUCT CODE : 2
THERMAL COEFF : .000700
TANK DIAMETER : 92.00
TANK PROFILE : 4 PTS
FULL VOL : 11527
69.0 INCH VOL : 9604
46.0 INCH VOL : 6023
23.0 INCH VOL : 2361

FLOAT SIZE: 4.0 IN.

WATER WARNING : 1.5
HIGH WATER LIMIT: 2.0

MAX OR LABEL VOL: 11527

~~OVERFILL LIMIT~~ : 10950
HIGH PRODUCT : 90%
DELIVERY LIMIT : 10374
DELIVERY LIMIT : 30%
DELIVERY LIMIT : 3458

LOW PRODUCT : 500
LEAK ALARM LIMIT: 50
SUDDEN LOSS LIMIT: 50
TANK TILT : 1.00

MANIFOLDED TANKS
T#: NONE

LEAK MIN PERIODIC: 10%
LEAK MIN PERIODIC : 1152

LEAK MIN ANNUAL : 10%
LEAK MIN ANNUAL : 1152

PERIODIC TEST TYPE
STANDARD

ANNUAL TEST FAIL
ALARM DISABLED

PERIODIC TEST FAIL
ALARM DISABLED

GROSS TEST FAIL
ALARM DISABLED

ANN TEST AVERAGING: OFF
PER TEST AVERAGING: OFF

TANK TEST NOTIFY: OFF

TNK TST SIPHON BREAK:OFF

DELIVERY DELAY : 5 MIN

SYSTEM SETUP

NOV 13, 2002 9:02 AM

SYSTEM UNITS

U.S.
SYSTEM LANGUAGE
ENGLISH
SYSTEM DATE/TIME FORMAT
MON DD YYYY HH:MM:SS xM

XTRA OIL
3495 CASTRO VALLEY
CASTRO VALLEY CA.
510-537-7845

SHIFT TIME 1 : 6:00 AM
SHIFT TIME 2 : DISABLED
SHIFT TIME 3 : DISABLED
SHIFT TIME 4 : DISABLED

TANK PER TST NEEDED WRN
DISABLED
TANK ANN TST NEEDED WRN
DISABLED

LINE RE-ENABLE METHOD
PASS LINE TEST

LINE PER TST NEEDED WRN
DISABLED
LINE ANN TST NEEDED WRN
DISABLED

PRINT TO VOLUMES
ENABLED

TEMP COMPENSATION
VALUE (DEG F) : 60.0
STICK HEIGHT OFFSET
DISABLED

H-PROTOCOL DATA FORMAT
HEIGHT
DAYLIGHT SAVING TIME
ENABLED

START DATE
APR WEEK 1 SUN
START TIME
2:00 AM
END DATE
OCT WEEK 6 SUN
END TIME
2:00 AM

RE-DIRECT LOCAL PRINTOUT
DISABLED

EURO PROTOCOL PREFIX
S

SYSTEM SECURITY
CODE : 000000

COMMUNICATIONS SETUP

PORT SETTINGS:

IN-TANK SETUP

T 3: PREMIUM
PRODUCT CODE : 3
THERMAL COEFF : .000700
TANK DIAMETER : 92.00
TANK PROFILE : 4 PTS
FULL VOL : 11527
69.0 INCH VOL : 9604
46.0 INCH VOL : 6023
23.0 INCH VOL : 2361

FLOAT SIZE: 4.0 IN.

WATER WARNING : 1.5
HIGH WATER LIMIT: 2.0

MAX OR LABEL VOL: 11527

HIGH PRODUCT : 10950
95%
90%
10374
DELIVERY LIMIT : 30%
3458

LOW PRODUCT : 500
LEAK ALARM LIMIT: 50
SUDDEN LOSS LIMIT: 50
TANK TILT : 1.00

MANIFOLDED TANKS
T#: NONE

LEAK MIN PERIODIC: 10%
1152

LEAK MIN ANNUAL : 10%
1152

PERIODIC TEST TYPE
STANDARD

ANNUAL TEST FAIL
ALARM DISABLED

PERIODIC TEST FAIL
ALARM DISABLED

GROSS TEST FAIL
ALARM DISABLED

ANN TEST AVERAGING: OFF
PER TEST AVERAGING: OFF

TANK TEST NOTIFY: OFF

TNK TST SIPHON BREAK: OFF

DELIVERY DELAY : 5 MIN

T 4: DIESEL
PRODUCT CODE : 4
THERMAL COEFF : .000450
TANK DIAMETER : 92.00
TANK PROFILE : 4 PTS
FULL VOL : 11527
69.0 INCH VOL : 9604
46.0 INCH VOL : 6023
23.0 INCH VOL : 2361

FLOAT SIZE: 4.0 IN.

WATER WARNING : 1.5
HIGH WATER LIMIT: 2.0

MAX OR LABEL VOL: 11527

HIGH PRODUCT : 10950
90%
10374
DELIVERY LIMIT : 30%
3458

LOW PRODUCT : 500
LEAK ALARM LIMIT: 50
SUDDEN LOSS LIMIT: 50
TANK TILT : 1.00

MANIFOLDED TANKS
T#: NONE

LEAK MIN PERIODIC: 10%
1152

LEAK MIN ANNUAL : 10%
1152

PERIODIC TEST TYPE
STANDARD

ANNUAL TEST FAIL
ALARM DISABLED

PERIODIC TEST FAIL
ALARM DISABLED

GROSS TEST FAIL
ALARM DISABLED

ANN TEST AVERAGING: OFF
PER TEST AVERAGING: OFF

TANK TEST NOTIFY: OFF

TNK TST SIPHON BREAK: OFF

DELIVERY DELAY : 5 MIN

ALARM HISTORY REPORT

----- IN-TANK ALARM -----

T 3:PREMIUM

SETUP DATA WARNING
APR 26. 2001 12:57 PM

HIGH PRODUCT ALARM
NOV 3. 2002 12:20 PM
MAY 18. 2001 2:55 AM
MAY 12. 2001 6:25 AM

INVALID FUEL LEVEL
SEP 1. 2001 1:15 PM

PROBE OUT
APR 26. 2001 3:14 PM
APR 26. 2001 2:57 PM
APR 26. 2001 2:57 PM

DELIVERY NEEDED
NOV 12. 2002 9:51 AM
OCT 18. 2002 8:02 PM
SEP 27. 2002 4:01 PM

ALARM HISTORY REPORT

----- IN-TANK ALARM -----

SETUP DATA WARNING
APR 26. 2001 12:57 PM

LOW PRODUCT ALARM
JUL 25. 2001 7:26 PM
JUN 1. 2001 1:21 PM

HIGH PRODUCT ALARM
OCT 30. 2002 8:22 PM
SEP 5. 2001 11:30 AM
MAY 13. 2001 6:56 AM

INVALID FUEL LEVEL
OCT 29. 2001 10:00 AM
JUN 1. 2001 6:17 PM

DELIVERY NEEDED
NOV 7. 2002 5:56 PM
OCT 30. 2002 9:47 AM
OCT 14. 2002 1:43 PM

ALARM HISTORY REPORT

----- IN-TANK ALARM -----

SETUP DATA WARNING
APR 26. 2001 12:57 PM

OVERFLOW ALARM
SEP 1. 2002 1:14 PM
SEP 1. 2002 12:33 PM
JUL 15. 2002 11:41 AM

LOW PRODUCT ALARM
AUG 18. 2001 4:45 PM
JUN 3. 2001 11:11 PM
JUN 2. 2001 11:26 PM

HIGH PRODUCT ALARM
NOV 4. 2002 12:07 PM
OCT 27. 2002 9:14 AM
OCT 20. 2002 6:52 AM

INVALID FUEL LEVEL
AUG 26. 2002 10:32 PM
AUG 23. 2002 7:20 PM
APR 15. 2002 5:57 PM

DELIVERY NEEDED
NOV 6. 2002 8:16 AM
NOV 2. 2002 5:32 PM
OCT 29. 2002 9:32 PM

ALARM HISTORY REPORT

----- IN-TANK ALARM -----

T 2:PLUS

SETUP DATA WARNING
APR 26. 2001 12:57 PM

LOW PRODUCT ALARM
JUN 6. 2001 3:16 PM

HIGH PRODUCT ALARM
MAY 17. 2001 12:30 PM

INVALID FUEL LEVEL
SEP 8. 2001 7:48 AM
AUG 31. 2001 8:41 PM

DELIVERY NEEDED
OCT 24. 2002 8:10 PM
SEP 17. 2002 8:39 PM
SEP 16. 2002 10:08 PM

* * * * * END * * * * *

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



October 25, 2002

RO 285

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

Mr. Keith Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: XTRA Oil Company Station dba Shell, 3495 Castro Valley Boulevard, Castro Valley - Request for
Total Fuel Oxygenate Analyses

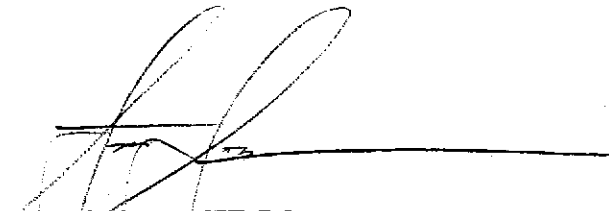
Dear Mr. Simas:

The case file for the referenced site was recently reviewed. This review was primarily conducted to identify the current suite of target compounds sought in water samples collected from the various wells within the network. Our review revealed that a number of potential fuel oxygenates may not have been sought historically from samples collected from these wells.

Please direct your consultant to analyze all samples collected during the next scheduled sampling event for the presence of total fuel oxygenates (MtBE, TAME, EtBE, DIPE, and TBA) and lead scavengers (EDB and 1,2-DCA / EDC) using EPA Method 8260. Such expanded analyses may be required to continue depending upon what is found.

Please contact me at (510) 567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Robert Weston, ACDEH
Paul King, P&D Environmental, 4020 Panama Court, Oakland, CA 94611

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



October 25, 2002

RO 285

Mr. Keith Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

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

NOTICE OF VIOLATION

Re: XTRA Oil Company Station dba Shell, 3495 Castro Valley Boulevard, Castro Valley –
Failure to Submit Requisite Monitoring Reports

Dear Mr. Simas:

Review of the case file for the subject site reveals that the 4th quarter 2001, and 1st, 2nd, and 3rd quarter 2002 monitoring reports have not yet been submitted. The most recent report in our possession is dated November 5, 2001, and documents the monitoring events that occurred during the 3rd quarter of 2001.

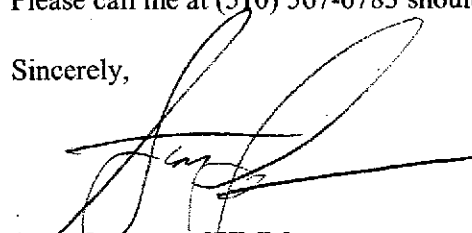
These reporting omissions are direct violations of Sec. 2652(d), California Code of Regulations, Title 23, Division 3, Chapter 16, Underground Storage Tank Regulations, and of your tank operating permit.

You are directed to submit the 4th quarter 2001, and 1st and 2nd quarters 2002 reports within 15 days of the date of this letter. The 3rd quarter 2002 report is due for submittal no later than November 30, 2002.

Please be advised that failure to submit the requested reports according to this directive will result in this case being referred for enforcement action. Please be further advised that Sec. 25299(b), California Health and Safety Code, Chapter 6.7, allows for civil penalties of up to \$500 per day per violation to be levied against an underground storage tank owner or operator upon conviction for violations of this sort, and possible revocation of your permit.

Please call me at (510) 567-6783 should you have any questions.

Sincerely,



Scott G. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Robert Weston, ACDEH



State Water Resources Control Board



Winston H. Hickox
Secretary for
Environmental
Protection

Division of Clean Water Programs

1001 I Street • Sacramento, California 95814
P.O. Box 944212 • Sacramento, California • 94244-2120
(916) 341-5757 • FAX (916) 341-5806 • www.swrcb.ca.gov/cwphome/ustef

Gray Davis
Governor

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.swrcb.ca.gov.

June 19, 2001

Xtra Oil Company
2307 Pacific Ave
Alameda, CA 94501

6-22-01
- Call w/ Dayna Kendrick
(SWACB) to express concern
That field work is taking
much longer than anticipated,
and as reflect in this PA.
SES

JUN 22 2001

**REQUEST FOR PRE-APPROVAL OF CORRECTIVE ACTION COSTS,
CLAIM NO. 001068, PA # 4
SITE ADDRESS: 3495 CASTRO VALLEY BLVD, CASTRO VALLEY, CA 94546**

I have reviewed your request, received on May 24, 2001, for pre-approval of corrective action costs; I will place these documents in your file for future reference. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective action costs.

Pursuant to Section 2811.4, subdivision (c), of the Cleanup Fund regulations and based upon the materials submitted, ~~the Cleanup Fund must deny your request for pre-approval.~~ You have failed to submit the required three bids for the tasks covered by your pre-approval request. Also the, single bid you provided for the task covered by your pre-approval request is unreasonable for the scope of work. Based on the Cleanup Fund's experience with similar sites in your area, we have determined that \$ 10,850 is reasonable for the tasks included in your pre-approval request. The breakdown of costs associated with each task is shown in Table 1 below.

There are two options available to you. You must secure the requisite bids for the tasks covered by the pre-approval request, and the Cleanup Fund will evaluate the reasonableness of the costs in light of the additional bids.

Or, you may resubmit the existing bid and request pre-approval for the amounts specified in Table 1. Since the Cleanup Fund has determined that the amount specified in Table 1 is reasonable for this scope of work, the three-bid requirement is unnecessary if you concur with the Cleanup Fund's determination. The Cleanup Fund has the authority to waive the three-bid requirement as unnecessary upon your request to do so. Therefore, if your resubmitted pre-approval request only seeks pre-approval for the amount the Cleanup Fund has determined reasonable (the amount specified in Table 1) and you request waiver of the three-bid requirement as unnecessary, the Cleanup Fund will grant your request for pre-approval and waive the three bid requirement, with respect to this scope of work, as unnecessary.

A waiver does not waive the three-bid requirement for the claim, but only for the tasks covered by the pre-approval request. Again, if you decide to seek waiver of the three-bid requirement because it is unnecessary, then you must provide a written request for waiver of the three-bid requirement and resubmit your pre-approval request seeking only the amounts specified in Table 1. In an effort to assist you in expediting the pre-approval process we have prepared the attached *Acceptance of Reasonable Cost/Request for Bid Waiver* form letter. If you concur/accept our reasonable cost determination and would like to request a bid waiver, then just sign and date the attached letter and return to us for further processing your Pre-Approval.

California Environmental Protection Agency



JUN 22 2001

Table 1
REASONABLE COST BREAKDOWN

#	Task*	Reasonable Cost, \$	Comments/Changes
1	Project Management	\$4,360	Cost includes Permitting, Health & Safety plan, Mark USA locations, Traffic Plan, Offsite Access, Project Coordination, Driller Oversight (time reduced to 12 hrs @ \$60/hr.) PID, Field Tools, Traffic Control Equipment, Lab Coordination, Report and Drafting (time reduced to 10 hrs @ \$60/hr.)
2	Driller	\$2,500	Cost includes all time and material for 14 borings.
3	Analytical	\$3,990	Copies of all invoices must be submitted to the Fund at the time of reimbursement.
	TOTAL Reasonable Cost	\$ 10,850	

* Task descriptions are the same as those identified in P & D Environmental's April 30, 2001 Cost Estimate

Should you decide to obtain the additional bids for satisfying the three-bid requirement, and if you need assistance in procuring contractor and consultant services for corrective action don't hesitate to call me at (916) 341-5757.

Sincerely,

Sunil Ramdass

Sunil Ramdass, Water Resources Control Engineer
Technical Review Unit
Underground Storage Tank Cleanup Fund

Enclosure

cc: Scott O. Serry, CHMM
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



April 6, 2001

STID 3747

Mr. Keith Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

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

RE: XTRA Oil Station, 3495 Castro Valley Boulevard, Castro Valley – Continued Off-Site
Assessment

Dear Mr. Simas:

I am in receipt and have completed review of the March 9, 2001 P&D Environmental (P&D) workplan for the continued assessment of groundwater conditions south of the subject site. This workplan was submitted under P&D cover dated March 28, 2001. This pending assessment work stems from our February 7, 2001 meeting where a request for this additional plume definition was first made.

The cited P&D work plan is accepted as submitted.

Please call me at (510) 567-6783 when field work has been scheduled or should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott G. Seery', written over a horizontal line.

Scott G. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Paul King, P&D Environmental

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
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

February 7, 2001

STID 3747

Mr. Keith Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: XTRA Oil Station, 3495 Castro Valley Boulevard, Castro Valley

Dear Mr. Simas:

This letter follows in the wake of today's meeting. Participants included, in addition to ourselves, Chuck Headlee, of the San Francisco Bay Regional Water Quality Control Board, and Paul King, of P&D Environmental, your environmental consultant. This meeting was convened to discuss the results of the multi-phase, off-site soil and water investigation (SWI). Appropriate future actions and concerns were also discussed. Important topics in this latter discussion were 1) a request for additional push-tool assessment prior to determining the locations of new off-site monitoring wells, and 2) practical Risk-Based Corrective Action (RBCA) tasks and data needs.

At this time, Xtra Oil is directed to submit a brief workplan outlining proposed tasks to complete the additional, supplementary push-tool assessment, which includes, among other elements, the following:

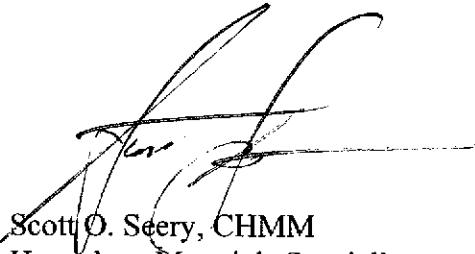
- Boring placement to be concentrated within the commercial property south of the subject site and immediately north of the residential properties along Redwood Court
- Perform continuous soil coring and logging
- Selected soil samples to be analyzed for TPH-G, -D, BTEX and any other parameters deemed necessary to aid future RBCA evaluation
- Water samples to be analyzed for TPH-G, -D, BTEX and MtBE. MtBE to be confirmed with Method 8260 where appropriate.

The requested workplan is due within 30 days of the date of this letter.

Mr. Keith Simas
Re: 3495 Castro Valley Blvd., Castro Valley
February 7, 2001
Page 2 of 2

Please contact me at (510) 567-6783 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott O. Seery", written over a horizontal line.

Scott O. Seery, CHMM
Hazardous Materials Specialist

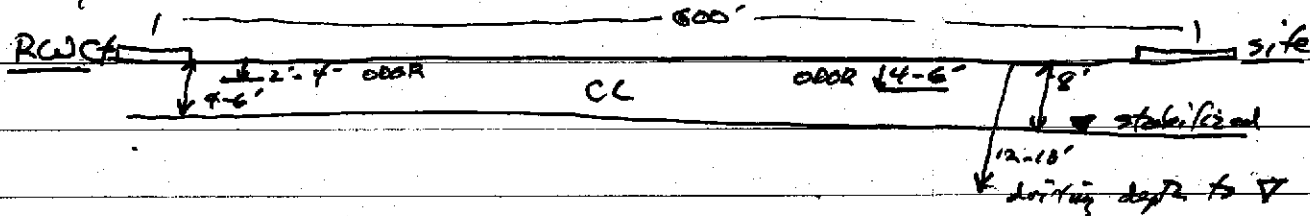
cc: Chuck Headlee, RWQCB
Dave Deaner, SWRCB UST Fund
Paul King, P&D Environmental, 4020 Panama Ct., Oakland, CA 94611

Xtra O.I.
3495 Castro Valley Bl
Castro Valley

MEETING: Paul King, Chuck Headlee

2-7-2001

- 1958's built
- ~600' plume from site to Redwood Ct.



- Artesian conditions in Redwood Ct.
- "Shear" noted in some of the RWCT. sample points
- GW appears confined near "site", and less so down gradient in RWCT. static \approx encountered depths
- bifurcated plume - could be due to changes in predominate GW flow directions over time: more diurnal to east, less diurnal to west
- Sanitary sewer at south of shopping center, just above homes on RWCT.

- ~~Issues:~~
- well placement ① will present Geoprobe w.p. for more sample points; will include soil analysis, and MTBC
 - RBC ② only 2 residential sites appear to be slab-on-grade
 - Diesel a mystery
 - MtBE / on going release ③ will eventually need to be evaluated
 - sewer line conduit on south of parking lot ③ probably not
 - backyard wells? no

Xtra Oil
3495 C.V.BI.
Castro Valley

■ Notes from meeting w/ Chuck Headlee (RWOCB) 1-17-01

- "Enhanced leak detection" to determine causes of on-going release
- More wells than are proposed by P+D are necessary
- Need to develop CAP/RBCA
- set up meeting w/ RWOCB, RP, P+D, LOP

1/18/01

- Call to Paul King (P+D) to seek meeting dates. He will check w/ RP and get back to me.



State Water Resources Control Board



Winston H. Hickox
Secretary for
Environmental
Protection

Division of Clean Water Programs
1001 I Street • Sacramento, California 95814 • (916) 227-7748
Mailing Address: P.O. Box 944212 • Sacramento, California • 94244-2120
FAX (916) 341-5806 • Internet Address: <http://www.swrcb.ca.gov/cwphome/ustcf>

Gray Davis
Governor

SS
RD 0285

December 6, 2000

Xtra Oil Company
2307 Pacific Ave
Alameda, CA 94501

**REQUEST FOR PRE-APPROVAL OF CORRECTIVE ACTION COSTS,
CLAIM NO. 001068,
SITE ADDRESS: 3495 CASTRO VALLEY BLVD, CASTRO VALLEY, CA 94546**

I have reviewed your request, received on August 24, 2000, for pre-approval of corrective action costs; I will place these documents in your file for future reference. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective action costs.

Pursuant to Section 2811.4, subdivision (c), of the Cleanup Fund regulations and based upon the materials submitted, the Cleanup Fund must deny your request for pre-approval. You have failed to submit the required three bids for the tasks covered by your pre-approval request. Also the, single bid you provided for the task covered by your pre-approval request is unreasonable for the scope of work. Based on the Cleanup Fund's experience with similar sites in your area, we have determined that \$ 800 is reasonable for the tasks included in your pre-approval request. The breakdown of costs associated with each task is shown in Table 1 below.

There are two options available to you. You must secure the requisite bids for the tasks covered by the pre-approval request, and the Cleanup Fund will evaluate the reasonableness of the costs in light of the additional bids.

Or, you may resubmit the existing bid and request pre-approval for the amounts specified in Table 1. Since the Cleanup Fund has determined that the amount specified in Table 1 is reasonable for this scope of work, the three-bid requirement is unnecessary if you concur with the Cleanup Fund's determination. The Cleanup Fund has the authority to waive the three-bid requirement as unnecessary upon your request to do so. Therefore, if your resubmitted pre-approval request only seeks pre-approval for the amount the Cleanup Fund has determined reasonable (the amount specified in Table 1) and you request waiver of the three-bid requirement as unnecessary, the Cleanup Fund will grant your request for pre-approval and waive the three bid requirement, with respect to this scope of work, as unnecessary.

A waiver does not waive the three-bid requirement for the claim, but only for the tasks covered by the pre-approval request. Again, if you decide to seek waiver of the three-bid requirement because it is unnecessary, then you must provide a written request for waiver of the three-bid requirement and resubmit your pre-approval request seeking only the amounts specified in Table 1.

In an effort to assist you in expediting the pre-approval process we have prepared the attached *Acceptance of Reasonable Cost/Request for Bid Waiver* form letter. If you concur/accept our reasonable cost determination and would like to request a bid waiver, then just sign and date the attached letter and return to us for further processing your Pre-Approval.

Table 1
REASONABLE COST BREAKDOWN

#	Task*	Reasonable Cost, \$	Comments/Changes
1	File Review	\$ 800	This cost is for all time and material associated with the file review.
	TOTAL Reasonable Cost	\$ 800	

* Task descriptions are the same as those identified in P & D Environmental's August 2, 2000 Cost Estimate

Should you decide to obtain the additional bids for satisfying the three-bid requirement, and if you need assistance in procuring contractor and consultant services for corrective action don't hesitate to call me at (916) 227-7748.

Sincerely,

Sunil Ramdass

Sunil Ramdass, Water Resources Control Engineer
Technical Review Unit
Underground Storage Tank Cleanup Fund

Enclosure

cc: Mr. Thomas Peacock
Alameda County EHD
✓ 1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577

P & D ENVIRONMENTAL

A Division of Paul H. King, Inc.

4020 Panama Court

Oakland, CA 94611

(510) 658-6916

December 5, 2000
Letter 0014.L92

Mr. Sunil Ramdass
State Water Resources Control Board
Division of Clean Water Programs
Underground Storage Tank Cleanup Fund Program
P. O. Box 944212
Sacramento, CA 94244-2120

SUBJECT: FILE REVIEW CLARIFICATION
XTRA OIL Company
3495 Castro Valley Blvd.
Castro Valley, CA

Mr. Ramdass:

P&D Environmental, a Division of Paul H. King, Inc., (P&D) is pleased to present this letter clarifying the need for a review of files for properties in the vicinity of the subject site. This letter is written to request that you pre-approve the file review so that the Risk Based Corrective Action (RBCA) can be performed.

This letter arises from a conversation on November 20, 2000 between you, Mr. Paul King of P&D, and Mr. Scott Seery of the Alameda County Department of Environmental Health (ACDEH). A brief history of the site vicinity investigation leading up to the need for a file review follows:

- o In 1997, offsite downgradient petroleum hydrocarbon-impacted groundwater was detected at Redwood Court, near the subject site. Several residences in the vicinity of Redwood Court may be potential receptors. To better determine the extent of contamination, additional offsite groundwater quality investigation was performed. Mr. Seery requested a letter status report with considerations necessary to perform a RBCA.
- o In response to Mr. Seery's request, P&D wrote Letter 0014.L67 (dated June 28, 1997, and titled "Site Status Update"). Based on discussions with Mr. Seery, the letter stated that an assessment of risk for the residences in Redwood Court was appropriate. The letter also stated that prior to performing the risk assessment, a review of the construction details of the pertinent residences must be done in order to evaluate the possibility of the exposure of building occupants to petroleum hydrocarbon vapors.
- o Between 1998 and 2000, additional offsite groundwater quality investigation was performed. The report documenting the investigation (P&D Report 0014.R34, dated June 28, 2000, titled "Offsite Groundwater Quality Investigation Report") recommended the following:

Based on the defined extent of petroleum hydrocarbons in groundwater in the vicinity of the subject site, P&D recommends that subsurface petroleum hydrocarbon concentrations be evaluated for potential human health risk concerns. Based on the shallow depth to groundwater and the presence of residential dwellings in the vicinity of Redwood Court, P&D anticipates that the focus of evaluation will be the Redwood Court area.
- o In a letter dated July 11, 2000, Mr. Seery requested a schedule for the initiation of the RBCA. As discussed with Mr. Seery and documented in P&D's June 28, 1997 letter, before the RBCA can be performed, its scope must be defined - in particular which buildings, due to the nature of their construction, have buried utilities which could pose potential pathways to receptors.

December 5, 2000
Letter 0014.L92

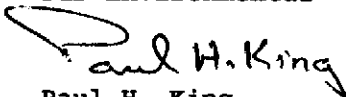
2

- o In accordance with conversations with Mr. Seery and P&D's June 28, 1997 letter documenting those conversations, P&D has proposed to perform a review of files documenting the construction of the properties on Redwood Court to define the scope of the RBCA. This file review needs to be done to define the possibility of potential transmission of petroleum hydrocarbon vapors through underground utility trenches to residences in Redwood Court which have slab-on-grade construction. This scope is set forth in P&D Proposal 080200.P1, dated August 2, 2000, which has been submitted for Pre-Approval to the Underground Storage Tank Cleanup Fund (USTCF).
- o On November 20, 2000 the discussions which resulted in the June 28, 1997 letter were discussed with you with Mr. Seery simultaneously on the telephone. You had requested that Mr. Seery write a letter which explicitly requires the file review. Mr. Seery stated that he was unable to do so because of prior commitments associated with understaffing at his agency.

Should you have any questions, please do not hesitate to contact us at (510) 658-6916.

Sincerely,

P&D Environmental



Paul H. King
Hydrogeologist

cc: Mr. Keith Simas, XTRA OIL Company
Mr. Scott Seery, Alameda County Department of Environmental Health

PHK/gmb
0014.L92

P & D ENVIRONMENTAL



State Water Resources Control Board



Winston H. Hickox
Secretary for
Environmental
Protection

Division of Clean Water Programs
1001 I Street • Sacramento, California 95814 • (916) 341-5757
Mailing Address: P.O. Box 944212 • Sacramento, California • 94244-2120
FAX (916) 341-5806 • Internet Address: <http://www.swrcb.ca.gov/cwphome/ustcf>

Gray Davis
Governor

November 20, 2000

S.S.
70-0285

DEC 01 2000

Xtra Oil Company
2307 Pacific Ave
Alameda, CA 94501

**REQUEST FOR ADDITIONAL INFORMATION FOR PRE-APPROVAL OF
CORRECTIVE ACTION COSTS, CLAIM NO. 001068,
SITE ADDRESS: 3495 CASTRO VALLEY BLVD, CASTRO VALLEY, CA 94546**

I have reviewed your request, received on June 7, 2000, for pre-approval of corrective action costs.

Your pre-approval request submittal is incomplete and cannot be processed at this time. The following marked items were not included in your submittal and must be submitted before Fund staff can review and determine the reasonableness and necessity of the costs. I will place these documents in your claim file for future reference.

- A minimum of three competitive bids is required for the proposed scope of work.** The proposed corrective action activity in your Pre-Approval Request requires a minimum of three competitive bids. If the prime consultant or the prime contractor identified in the Pre-Approval Request has not been selected utilizing a competitive bid process, then a minimum of three bids must be received for their services. Three bids are required for all corrective action work. However, we typically only require the project to demonstrate compliance at the soil and groundwater investigation phase and the remediation phase. At least one competitive bid process must occur at each of these two phases.
- A completed "Cost Pre-Approval Request" form; signed by the claimant or an authorized representative.** I have enclosed with this letter a copy of the "Cost Pre-Approval Request" form; please use this form in the future to request pre-approval of corrective action costs. If an authorized representative signs the pre-approval request form, then an authorized representative form must be on file for this claim or submitted with your request.
- A complete and signed copy of the proposed investigative work plan, corrective action plan, or other work plan, including copies of all work plan addenda.**
- A signed copy of the appropriate lead regulatory oversight agency approval letter for the proposed plan and all addenda.**

- A complete copy of the Request for Bids (RFB) and a list of all firms invited to bid.** It is strongly recommended that the RFB include a "fill-in-the-blanks" Bid Form identifying all major tasks of the proposed work along with the following minimum cost breakdown items for each task:
- ◆ List of all staff/worker classifications and hourly rates of each to be utilized.
 - ◆ The number of hours to be utilized by each staff/worker
 - ◆ Subcontractor costs
 - ◆ Equipment costs
 - ◆ Itemized-listing of estimated ancillary/incidental costs
- Complete copies of all bids and other correspondence received in response to the RFB.** All cost proposals should include the *completed* cost proposal breakdown, with task subtotals and a grand total cost for the entire scope of work.

If you need assistance in procuring contractor and consultant services or if you have any questions, don't hesitate to call me. I can be reached at (916) 341-5757.

Sincerely,

Sunil Ramdass.

Sunil Ramdass, Water Resources Control Engineer
Technical Review Unit
Underground Storage Tank Cleanup Fund

Enclosure

cc: Scott O. Seery
Alameda County EHD
✓ 1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577



State Water Resources Control Board



Winston H. Hickox
Secretary for
Environmental
Protection

Division of Clean Water Programs
2014 T Street • Sacramento, California 95814 • (916) 227-7748
Mailing Address: P.O. Box 944212 • Sacramento, California • 94244-2120
FAX (916) 227-4530 • Internet Address: <http://www.swrcb.ca.gov/cwphome/ustcf>

00 AUG 30 PM 3:17

Gray Davis
Governor

August 28, 2000

Xtra Oil Company
2307 Pacific Ave
Alameda, CA 94501

HO-0285
[Handwritten signatures and initials]

REQUEST FOR ADDITIONAL INFORMATION FOR PRE-APPROVAL OF CORRECTIVE ACTION COSTS, CLAIM NO. 001068, SITE ADDRESS: 3495 CASTRO VALLEY BLVD, CASTRO VALLEY, CA 94546

I have reviewed your request, received on August 24, 2000, for pre-approval of corrective action costs.

Your pre-approval request submittal is incomplete and cannot be processed at this time. The following marked items were not included in your submittal and must be submitted before Fund staff can review and determine the reasonableness and necessity of the costs. I will place these documents in your claim file for future reference.

- A minimum of three competitive bids is required for the proposed scope of work.** The proposed corrective action activity in your Pre-Approval Request requires a minimum of three competitive bids. If the prime consultant or the prime contractor identified in the Pre-Approval Request has not been selected utilizing a competitive bid process, then a minimum of three bids must be received for their services. Three bids are required for all corrective action work. However, we typically only require the project to demonstrate compliance at the soil and groundwater investigation phase and the remediation phase. At least one competitive bid process must occur at each of these two phases.
- A completed "Cost Pre-Approval Request" form; signed by the claimant or an authorized representative.** I have enclosed with this letter a copy of the "Cost Pre-Approval Request" form; please use this form in the future to request pre-approval of corrective action costs. If an authorized representative signs the pre-approval request form, then an authorized representative form must be on file for this claim or submitted with your request.
- A complete and signed copy of the proposed investigative work plan, corrective action plan, or other work plan, including copies of all work plan addenda. All documents that are submitted with the Pre-Approval request must be legible.**
- A signed copy of the appropriate lead regulatory oversight agency approval letter for the proposed plan and all addenda.**

P & D ENVIRONMENTAL

A Division of Paul H. King, Inc.

4020 Panama Court

Oakland, CA 94611

(510) 658-6916

July 25, 2000
Letter 0014.L85

Mr. Scott Seery
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Suite #250
Alameda, CA 94502

SUBJECT: SUBSURFACE INVESTIGATION STATUS REPORT
XTRA OIL Company
3495 Castro Valley Blvd.
Castro Valley, CA

Dear Mr. Seery:

In response to your July 11, 2000 request, P&D Environmental, a Division of Paul H. King, Inc. (P&D) is pleased to present this status report of subsurface investigation in the vicinity of the subject site. This letter also describes free product removal methods from well MW4 at the site.

Subsurface Investigation

Field activities for offsite subsurface investigation were completed on May 18, 2000. The results of the offsite subsurface investigation are presented in P&D's Offsite Groundwater Quality Investigation Report (Report 0014.R34) dated June 28, 2000. A copy of the report is attached with this letter.

Work plan submittal for permanent offsite groundwater monitoring wells has been pending completion of the offsite groundwater quality investigation. A work plan for permanent offsite groundwater monitoring wells will be submitted to your office by August 21, 2000.

Onsite well MW2 was replaced by onsite well MW4 in August 1997. P&D is not aware of the need for any additional onsite groundwater monitoring wells. OK

Initiation of the pending Risk Based Corrective Action (RBCA) evaluation is pending proposal submittal to XTRA OIL Company, and UST Fund pre-approval of the proposal. The time necessary for UST Fund pre-approval is unknown, but is expected to be two to three weeks. A proposal for evaluation of County Building Department utility locations and foundation construction for structures surrounding the west end of Redwood Court will be submitted to XTRA OIL Company by August 2, 2000. This scope of work was set forth in P&D's Site Status Update letter dated June 28, 1997 (letter 0014.L67).

MTBE Confirmation

Based on previous discussions, a sample from MW4 of the wells will be evaluated for MTBE and other fuel oxygenates. The sample will be sampled by July 26, 2000 and the sample analyzed for MTBE and other fuel oxygenates using EPA Method 8260. The results will be forwarded to your office upon receipt from the laboratory.

Free Product Removal

As we reported to you in April, 2000 during a telephone conversation, P&D's quarterly groundwater monitoring and sampling activities identified approximately 5.5 inches of free product in monitoring well MW4 on March 9, 2000. The free product was noted to be coffee colored and had an odor resembling aged diesel fuel. This was reported to the owners of the subject site promptly, who began a program of free product removal consisting of the following:

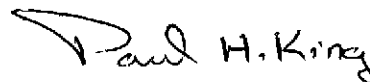
July 25, 2000
Letter 0014.L85

- o Placement of a passive specific-gravity bailer into the monitoring well, and;
- o Periodic emptying of the free product in the bailer into a covered five gallon container on site (daily at first, then less often as less free product fills the bailer).

Should you have any questions, please do not hesitate to contact us at (510) 658-6916.

Sincerely,

P&D Environmental



Paul H. King
Hydrogeologist

Attachment: Offsite Groundwater Quality Investigation Report (0014.R34)

cc: Mr. Keith Simas, XTRA OIL Company (without attachment)

PHK/gmb
0014.L85



July 11, 2000

STID 3747

Mr. Keith Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

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

NOTICE OF VIOLATION

RE: XTRA Oil Station, 3495 Castro Valley Boulevard, Castro Valley

Dear Mr. Simas:

In correspondence from this office dated April 26, 2000, you were requested to submit the following within 30 days of the date of that letter:

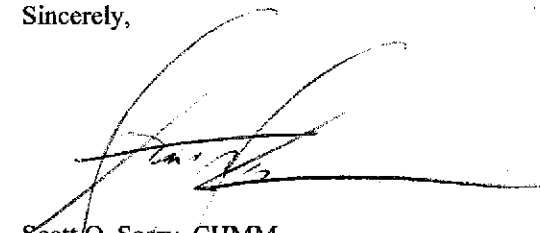
- Status update report for the on-going off-site investigation, including current off-site access issues and projected completion date for this years-long task
- Firm schedule for submittal of a workplan for additional, permanent monitoring wells, both those constructed in off-site locations and as a replacement for (destroyed) well MW-2
- Firm schedule for initiation of the pending *Risk-Based Corrective Action* (RBCA) evaluation

You were also requested to confirm the presence of methyl tert-butyl ether (MtBE) and the other fuel oxygenates using EPA Method 8260 during the (then) next sampling event. Review of the P&D Environmental report documenting the June 8, 2000 sampling and monitoring event indicates these requested tasks were not completed.

You have 15 days to comply with the above requests. Failure to comply will result in this case being referred to the appropriate agency for enforcement action.

Please contact me at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Paul King, P&D Environmental
Mike O'Connor, Alameda County District Attorney's Office

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

April 26, 2000

STID 3747

Mr. Keith Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: XTRA Oil Station, 3495 Castro Valley Boulevard, Castro Valley

Dear Mr. Simas:

I am in receipt of the November 2, 1999 P&D Environmental quarterly monitoring and sampling report for the subject site, submitted under Xtra Oil Company cover dated January 4, 2000. This report documents activities that occurred during August 1999, the 3rd quarter of 1999.

Receipt of this report ~4.5 months after completion of field activities is unacceptable. Such reports are to be submitted within 60 days of completion of field activities. This issue was brought to your attention earlier in correspondence from this office dated December 2, 1999. Please be reminded that there is an expectation of timeliness for the submittal of these reports.

In addition, you are requested to submit the following within 30 days:

- Status update report for the on-going off-site investigation, including current off-site access issues and projected completion date for this years-long task
- Firm schedule for submittal of a workplan for additional, permanent monitoring wells, both those constructed in off-site locations and as a replacement for (destroyed) well MW-2
- Firm schedule for initiation of the pending *Risk-Based Corrective Action* (RBCA) evaluation

Further, you are requested to confirm the presence of methyl tert-butyl ether (MtBE) using EPA Method 8260 during the next sampling event. At that time, the other fuel oxygenates are to be sought. Samples, therefore, are to be analyzed for the presence of: tertiary butyl alcohol (TBA), tertiary amyl methyl ether (TAME), ethyl tertiary butyl ether (ETBE), and MtBE. Because the ether oxygenates and TBA are not included in the standard list of analytes for EPA Method 8260, these additional compounds must be specifically requested when submitting samples to the laboratory for analysis.

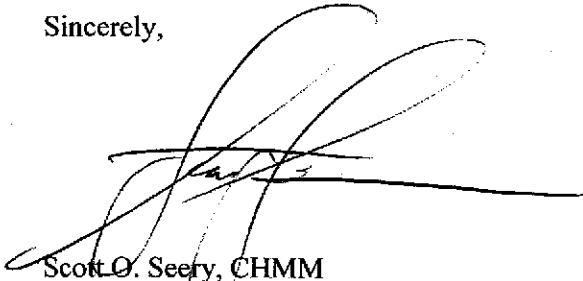
Mr. Simas
Re: 3495 Castro Valley Blvd., Castro Valley
April 26, 2000
Page 2 of 2

For your information, Senate Bill (SB) 989 was signed into law by Governor Davis on October 8, 1999. SB 989 directs the State Water Resources Control Board (SWRCB) to identify areas most vulnerable to releases of MtBE, prioritize resources, and develop investigation and cleanup guidelines. The SWRCB MtBE cleanup guidelines have now been drafted, and prescribe the step-wise process in development of a *Site Conceptual Model* (SCM). A SCM, now required for all MtBE release sites, is the progressive assemblage of information regarding the distribution of chemicals at a site, its hydrologic setting, geology, surrounding land use, well locations, and existing and projected water use patterns. The SCM functions as the framework for the investigation, remediation, and ultimately the closure of the site. Each phase of an investigation should seek to fill any data gaps that may remain from previous phases. Once the source area and receptor pathways have been adequately characterized, an appropriate remedial alternative can be selected and implemented.

Attached to this letter you will find a copy of Appendix C, derived from the referenced SWRCB MtBE guidance. Appendix C provides a format for your consultant to follow when putting together the SCM for this site. You are requested to ensure that your consultant addresses to these reporting elements when submitting reports documenting work at your site.

Please contact me at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachment – Appendix C

cc: Chuck Headlee, RWQCB
Paul King, P&D Environmental (w/attachment)

Appendix C

Site Conceptual Model Reports

The Site Conceptual Model (SCM) is a written or graphical representation of the release scenario, site characteristics (geology, hydrogeology, etc.) and the likely distribution of chemicals at the site. It links potential sources to potential receptors through transport of chemicals in air, soil, and water. It also provides a framework for the entire project and a communication tool for regulators, responsible parties, and other stakeholders. The goals of the conceptual model are listed below:

- Identify how the distribution of chemicals is changing in space and time
- Identify potential current and future receptors
- Identify environmental issues that need to be addressed

Reporting

Reports submitted to regulatory agencies are by necessity specific to the type of information they are presenting. They may contain a summary of activities, backup data to support conclusions, etc. A report that attempts to convey a representation of a SCM needs to meet the goals listed above. To meet these goals, investigation reports usually, at a minimum, contain the following elements:

Text

1. Site Description, Land Use, and Water Use
2. Chronology of Events
3. Site Stratigraphy and Hydrogeology
4. Well and Conduit Study
5. Estimation of Release Mass (if available)
6. Source Removal Activities
7. Remediation Activities

Figures

1. Site Location Map
2. Site Vicinity Map with Receptor Wells
3. Site Map with Groundwater Gradients, Cross Section Lines, and any known preferential pathways
4. Site Map with Isoconcentration Contours
5. Cross Section - long axis of plume
6. Cross Section - short axis of plume
7. Cross Section of Regional Geology (optional)
8. Concentration vs. Time Plots for Each Well
9. Concentration vs. Distance (optional)

Tables

1. Groundwater Elevation Data
2. Groundwater Analytical Data
3. Soil Analytical Data

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

December 2, 1999

STID 3747

Mr. Keith Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: XTRA Oil Station, 3495 Castro Valley Boulevard, Castro Valley

Dear Mr. Simas:

I am in recent receipt of the September 30, 1999 P&D Environmental quarterly monitoring and sampling report for the subject site, submitted under Xtra Oil Company cover dated November 22, 1999. This report documents activities that occurred during April 1999, the 2nd quarter of 1999.

Receipt of this report 7 months after completion of field activities is unacceptable. Such reports are to be submitted within 60 days of completion of field activities from this point forward.

Please contact me at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Paul King, P&D Environmental

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



October 18, 1999

ENVIRONMENTAL HEALTH SERVICES

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

STID 3747

Mr. Keith Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: XTRA Oil Station, 3495 Castro Valley Boulevard, Castro Valley – Continued Off-Site
Assessment

Dear Mr. Simas:

I am in receipt and have completed review of the October 8, 1999 P&D Environmental (P&D) "updated" work plan for the continued assessment of groundwater conditions on the east-side of Redwood Road. This work plan was amended October 15, 1999 in the form of an area map showing revised locations for borings P27 and P28. This pending assessment work stems from our November 21, 1997 meeting where the requirement for plume definition and completion of a Risk-Based Corrective Action (RBCA) evaluation, among other elements, was formalized. The pending scope of work is a continuation of work already performed in the wake of that meeting.

The cited P&D work plan, as amended, is accepted.

This work plan is to be implemented within 30 days of the date of this letter.

Please call me at (510) 567-6783 when field work has been scheduled or should you have any questions.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Paul King, P&D Environmental

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

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)

September 10, 1999

STID 3747

Mr. Keith Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: 3495 Castro Valley Boulevard, Castro Valley

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Simas:

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: 3495 Castro Valley Blvd., Castro Valley

September 10, 1999

Page 2 of 2

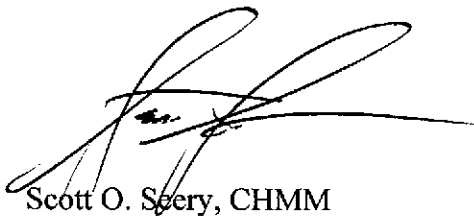
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 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) 567-6783 should you have any questions about the content of this letter.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB

SAMPLE LETTER (2): LIST OF LANDOWNERS FORM

Name of local agency
Street address
City

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

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

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

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

Sincerely,

Signature of primary responsible party

Name of primary responsible party

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

Name of local agency
Street address
City

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

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

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

Sincerely,

Signature of primary responsible party

Name of primary responsible party

cc: Names and addresses of all record fee title owners

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

STID 3747

March 25, 1999

Forrest Riley
3250 Concord Avenue
Brentwood, CA 94513

RE: Environmental Investigation, 3495 Castro Valley Boulevard, Castro Valley – Site
Access Permission

Dear Mr. Riley:

The referenced site has been the subject of an environmental investigation mandated by this office. The subject investigation is a requirement of the California Underground Storage Tank Regulations (Article 11 of Title 23, Division 3, Chapter 16, California Code of Regulations) and the Porter-Cologne Water Quality Control Act ("Water Code"). Such investigations are required when a release from an underground storage tank (UST) has impacted, or threatens to impact, ground water resources of the state. A release of this sort has occurred at the subject site.

The designated responsible party (RP) in this case is in the process of fulfilling a basic requirement to determine the extent of the fuel release associated with this site. After completion of the initial phases of the investigation, it has clearly become necessary to perform additional work to adequately define the limits of contamination.

The approved scope of work for this next phase of the investigation includes the installation of a number of temporary sampling points, one of which, designated ~~POS~~, is slated to be installed on property that you own. I understand that Mr. Paul King (P&D Environmental), the RP's environmental contractor, has approached you about this issue and that you have not granted the permission necessary for this work to proceed.

Please be informed that this investigation has been mandated under authority of California law and regulation. The RP is attempting to comply with provisions of these laws and regulations. Access to properties on the east side of Redwood Road is critical to fully evaluate this UST release.

We encourage you to allow access to the RP in order to facilitate the completion of this investigation. Disruption to the site will be minimal and temporary, and the work will be performed at no cost to you. This office is willing to provide you whatever technical information you should need to become better informed of this project, and to assist you in your decision to allow access.

Mr. Forrest Riley

RE: Environmental Investigation, 3495 Castro Valley Blvd., Castro Valley

March 25, 1999

Page 2 of 2

As I explained to you today during our telephone conversation, please be advised that Section 25289(a), California Health and Safety Code, grants authority specified under Section 25185.5 to inspect any real property that is within 2000 feet of an UST, and do, among others tasks, any of the following:

- a) collect samples above or beneath the land,
- b) set up and maintain monitoring equipment for the purpose of assessing or measuring the migration of pollutants on, beneath, or toward the land

Failure to allow such access is a violation of California law.

Should such access not be allowed to facilitate this investigation, Section 13267 of the California Water Code provides authority to the California Regional Water Quality Control Board (RWQCB) to issue an Executive Order directing you to perform the pending work. Should this become necessary, you would consequently bear the costs associated with the performance of this work.

Please feel free to call me, or have your attorney do so, at 510/567-6783 should there be any questions about this project or if I can provide any assistance to you during your contemplation of these issues.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Paul King, P&D Environmental
Ted Simas, Xtra Oil Company, 2307 Pacific Ave., Alameda, CA 94501

P & D ENVIRONMENTAL

A Division of Paul H. King, Inc.
4020 Panama Court
Oakland, CA 94611
(510) 658-6916

FAX TRANSMITTAL COVER SHEET

Date: 3/25/99 Job #: _____

To: James Scott Seery

Company: Ala Co Env. Health Dept

From: Paul H. King
P&D ENVIRONMENTAL

Number of pages in this transmittal, including this cover sheet: _____

SUBJECT: ATRA OEL - Castro Valley

MESSAGE: The Property Owner for location

P28 is Forrest Riley
3250 Concord Ave
Brentwood, CA 94513

925 634-2281

We told me on 3/20/99 that he would
not allow site access for sample collection.
I said that you would contact him.

-Paul

If transmittal is incomplete, please call (510) 658-6916.
P&D Environmental fax number: (510) 658-9074.

DESTINATION FAX NUMBER: 337-9335

FAX04.94

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



STID 3747

March 22, 1999

Peter Clark
JMA Properties
10080 No. Wolfe Road
Cupertino, CA 95014

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

RE: Environmental Investigation, 3495 Castro Valley Boulevard, Castro Valley – Site
Access Permission

Dear Mr. Clark:

The referenced site has been the subject of an environmental investigation mandated by this office. The subject investigation is a requirement of the California Underground Storage Tank Regulations (Title 23, Division 3, Chapter 16, California Code of Regulations) and the Porter-Cologne Water Quality Control Act ("Water Code"). Such investigations are required when a release from an underground storage tank (UST) has impacted, or threatens to impact, ground water resources of the state. A release of this sort has occurred at the subject site.

The designated responsible party (RP) in this case is in the process of fulfilling a basic requirement to determine the extent of the fuel release associated with this site. After completion of the initial phase of the investigation, it has clearly become necessary to perform additional work to adequately define the limits of contamination.

The approved scope of work for this next phase of the investigation includes the installation of a number of temporary sampling points, one of which, designated ~~P27~~, is slated to be installed on property that I understand you control. I understand that Mr. Paul King (P&D Environmental), the RP's environmental contractor, has approached you about this issue and that you have not granted the permission necessary for this work to proceed.

Please be informed that this investigation has been mandated under authority of California law and regulation. The RP is attempting to comply with provisions of these laws and regulations. Access to properties on the east side of Redwood Road is critical to fully evaluate this UST release.

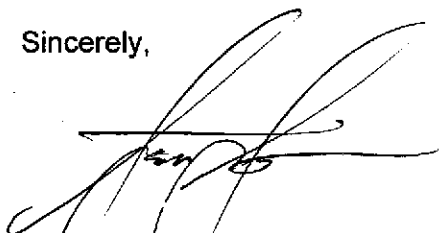
We encourage you to allow access to the RP in order to facilitate the completion of this investigation. Disruption to the site will be minimal and temporary, and the work will be performed at no cost to you. This office is willing to provide you whatever technical information you should need to become better informed of this project, and to assist you in your decision to allow access.

Mr. Peter Clark
RE: Environmental Investigation, 3495 Castro Valley Blvd., Castro Valley
March 22, 1999
Page 2 of 2

Please be advised, however, that should such access not be allowed to facilitate this investigation, provisions of the California Water Code provide authority to the California Regional Water Quality Control Board (RWQCB) to issue an Executive Order directing you to perform the pending work, but *at your cost*.

Please call me at 510/567-6783 should you have any questions about the project or if I can provide any other assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott O. Seery", written over a horizontal line.

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Paul King, P&D Environmental
Ted Simas, Xtra Oil Company, 2307 Pacific Ave., Alameda, CA 94501



Cal/EPA

3747
SOS



Pete Wilson
Governor

**State Water
Resources
Control Board**

March 18, 1998

Division of
Clean Water
Programs

Xtra Oil Company
2307 Pacific Ave
Alameda, CA 94501

Mailing Address:
P.O. Box 944212
Sacramento, CA
94244-2120

**PRE-APPROVAL OF CORRECTIVE ACTION COSTS, CLAIM NO. 1068,
SITE ADDRESS: 3495 CASTRO VALLEY BLVD, CASTRO VALLEY, CA 94546**

2014 T Street,
Suite 130
Sacramento, CA
95814
(916) 227-4463
FAX (916) 227-4530

I have reviewed your request, received on March 16, 1998, for pre-approval of corrective action costs; I will place these documents in your file for future reference. I have included a copy of the "Cost Pre-Approval Request" form; please use this form in the future for requesting pre-approval of corrective actions costs.

World Wide Web
<http://www.swrcb.ca.gov/~cwphome/fundhome.htm>

With the following provisions, the total cost pre-approved as eligible for reimbursement for completing the December 15, 1997, P & D Environmental workplan approved by the Alameda County EHD (County) in their January 22, 1998 letter, is \$; see the table below for a breakdown of costs. (The total amount approved for payment through request number 3 for work at your site that has been directed and approved by the County is \$ 143,888.)

Be aware that this pre-approval does not constitute a decision on reimbursement: all reasonable and necessary corrective action costs for work directed and approved by the County will be eligible for reimbursement per the terms of your Letter of Commitment at costs consistent with those pre-approved in this letter.

All future costs for corrective action must be approved in writing by Fund staff. Future costs for corrective action must meet the requirements of Article 11, Chapter 16, Underground Storage Tank Regulations.

COST PRE-APPROVAL BREAKDOWN

Task	Amount Pre-Approved	Comments
Oversight, Sample Collection, Report Preparation	\$4,500	
Drill 2 Wells	1,760	
Testing	375	
Geoprobe Sampling	485	
TOTAL PRE-APPROVED	\$7,120	

- The actual costs and scope of work performed must be consistent with the pre-approval for it to remain valid.

- The work products must be acceptable to the County and the Regional Water Quality Control Board.
- It is my opinion that it is unnecessary to obtain three bids for this scope of work; the Fund's three bid requirement is waived for this scope of work.
- If a different scope of work becomes necessary, then you must request pre-approval of costs on the new scope of work.
- Although I have referred to the P & D Environmental proposal in my pre-approval above, please be aware that you will be entering into a private contract: the State of California cannot compel you to sign any specific contract. This letter **pre-approves the costs** as presented in the proposal dated March 12, 1998 by P & D Environmental for conducting the work approved by the County for implementing the December 15, 1997, P & D Environmental workplan.

I also want to remind you that the Fund's regulations require that you obtain at least three bids, or a bid waiver from Fund staff, from qualified firms for all necessary corrective action work. The legislation governing the Fund requires that the Fund assist you in procuring contractor and consultant services for corrective action. If you need assistance in contracting for corrective action services, don't hesitate to call me.

Please remember that it is still necessary to submit the actual costs of the work as explained in the Reimbursement Request Instructions to confirm that the costs are consistent with this pre-approval before you will be reimbursed. *To make this easier, insure that your consultant prepares his invoices to match the format of the original estimate, and provides reasonable explanations for any changes made in the scope of work or increases in the costs. When the invoices are submitted you must include copies of all:*

- *subcontractor invoices,*
- *technical reports, when available, and*
- *applicable correspondence from the County.*

Please call if you have any questions; I can be reached at (916) 227-4463.

Sincerely,



Nina Ciani, Sanitary Engineering Associate
Technical Review Unit
Underground Storage Tank Cleanup Fund

DATE RECEIVED AT
PHOTOCOPY

SEP 19 11 11 24

Enclosure

cc: Mr. Thomas Peacock
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577



ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

January 22, 1998

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

STID 3747

Mr. Keith Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: 3495 CASTRO VALLEY BOULEVARD, CASTRO VALLEY -

Dear Mr. Simas:

Thank you for submittal of the December 15, 1997 P & D Environmental (P&D) work plan for further off-site assessment of the release from the underground storage tanks (UST) at the referenced site. After review of the work plan, I consulted today with Mr. Paul King of P&D regarding a few elements of the work plan and schedule for their implementation, reaching an accord.

The December 15, 1997 P&D off-site assessment work plan has been accepted with the following provisions:

- 1) Proposed sanitary sewer trench observation wells shall be installed within, but only to the base of, the Redwood Road sewer line trench.

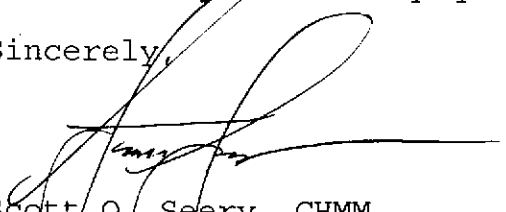
This modifies the proposed plan which called for such wells to be constructed within a proximal Redwood Road medium strip. This change will afford direct evidence, rather than indirect, whether the sewer trench is inundated during periods of high ground water, and, hence, providing a conduit for contaminant migration to more distant receptors.

- 2) Should ground water be encountered in completed sanitary sewer trench observation wells, samples shall be collected and analyzed for the same suite of target compounds as for samples drawn from the permanent wells located on the subject site.
- 3) Sanitary sewer trench observation wells shall be installed following an accelerated schedule in order to accommodate the 1998 rainy season (i.e., January - March) where there is greater potential to encounter high ground water conditions.

Mr. Simas
RE: 3495 Castro Valley Blvd.
January 22, 1998
Page 2 of 2

Please contact me at (510) 567-6783 when field work is scheduled and should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Mee Ling Tung, Director
Dick Pantages, Chief, Environmental Protection
Stephen Hill, RWQCB
Paul King, P&D Environmental

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

November 24, 1997

STID 3747

Mr. Keith Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

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

RE: 3495 CASTRO VALLEY BOULEVARD, CASTRO VALLEY - REQUEST FOR
ADDITIONAL ASSESSMENT TO FACILITATE COMPLETION OF RISK-
BASED CORRECTIVE ACTION EVALUATION

Dear Mr. Simas:

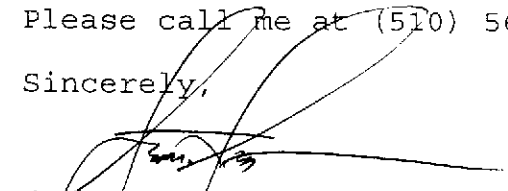
Thank you for meeting with me on November 21, along with your consultant, Mr. Paul King, P & D Environmental, regarding the remaining tasks associated with completion of the risk-based corrective action (RBCA) evaluation for this site. As you will recall, we discussed the need for:

- 1) plume definition east / southeast of both the site and Castro Valley Boulevard, and determination of potential receptor populations therein,
- 2) determining what role utility conduits (e.g., sewer line trenches, etc.) may play in contaminant (both dissolved and vapor phases) and shallow ground water dispersal from the source area and towards potential receptor populations,
- 3) the installation of additional permanent monitoring wells, and
- 4) a timeline for implementation of the RBCA elements.

At this time please submit a work plan describing proposed activities for 1) defining the plume east / southeast of the site and Castro Valley Boulevard; and 2) evaluating utility conduits for their contribution in contaminant and ground water dispersal. **This work plan is due within 3 weeks of the date of this letter.**

Please call me at (510) 567-6783 should you have any questions.

Sincerely,


Scott O. Seery, CHMM
Hazardous Materials Specialist

Mr. Simas
RE: 3495 Castro Valley Blvd.
November 24, 1997
Page 2 of 2

cc: Mee Ling Tung, Director
Kevin Graves, RWQCB
Paul King, P&D Environmental

Meeting notes: 11/24/97

Xtra Oil
3485 C.V. Blvd
Castro Valley

- ① determine if SS. is inundated
- ② define east side of plume
- ③ determine vapor/GW conduits
- ④ RBCA
- ⑤ final wells

1st + 3rd reduce to these questions

Letter

one or two phases (And)

Phase proposed already for R.C. Ct. P20, 21, 22

- ① plume definition (Probe) - w/ final wells
- ② utility evaluation (contaminant conduits)
- ③ RBCA / ~~Probe~~
- ④ CAP

←
Time line

11/13/97

7/96 meeting w/ Paul King

- discussed need to collect additional soil data (Poc) from 6 locations along axis of plume
- ADEH letter requesting map of sample locations and field schedule

11/96 conversation w/ P. King

- requested add evaluation of utility conduits to scope of RBCA

5/97 ADEH request for RBCA update

6/97 P+D response "site status update"

- propose to evaluate ACo building plans

Needs:

- evaluate also commercial vapor exposure + utility conduits
- additional wells
- R.W. Rd. utilities → down stream receptors
- east side R.W. Rd. assessment

P & D ENVIRONMENTAL

A Division of Paul H. King, Inc.
4020 Panama Court
Oakland, CA 94611
(510) 658-6916

28, 1997
Letter 0014

ENVIRONMENTAL
PROTECTION
JUL 22 PM 4:06

Mr. Scott Seery
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

SUBJECT: **SITE STATUS UPDATE**
XTRA OIL Company
3495 Castro Valley Blvd.
Castro Valley, CA

Dear Mr. Seery:

This letter is written in response to your request for a site status update. In accordance with your request, you will also find attached a work plan (Work Plan 0014.W4) for the installation of one groundwater monitoring well to replace groundwater monitoring well MW2.

Based upon review of underground utility conditions at Redwood Court, it appears that the majority of the underground utilities do not enter the buildings below ground. Rather, it appears that the majority of the underground utilities are buried between the street and the buildings, and that the utilities then enter the buildings above ground.

To further evaluate the potential of underground utility trenches as conduits for petroleum hydrocarbon vapors into the buildings surrounding Redwood Court, we propose to evaluate building plans at the Alameda County Building Department for underground utility locations. In addition, the buildings surrounding Redwood Court do not appear to have slab-on-grade foundations. Rather, there appears to be a crawl space beneath these structures. We also propose to evaluate the foundation construction design at the County Building Department to further assess the potential for exposure of building occupants to petroleum hydrocarbon vapors.

Following building plan evaluation, we will propose collection of soil gas samples from a representative number of utility trenches which extend under the buildings. The soil gas samples will be collected to evaluate the presence of petroleum hydrocarbon vapors in the trench backfill materials for risk assessment purposes.

Should you have any questions or comments, please do not hesitate to contact me at (510) 658-6916.

Sincerely,

P&D Environmental


Paul H. King
Hydrogeologist

Enclosure

PHK
0014.L67

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



May 13, 1997

ENVIRONMENTAL HEALTH SERVICES

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

STID 3747

Mr. Keith Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: 3495 CASTRO VALLEY BOULEVARD, CASTRO VALLEY - REQUEST FOR
STATUS UPDATE ON RISK-BASED CORRECTIVE ACTION EVALUATION

Dear Mr. Simas:

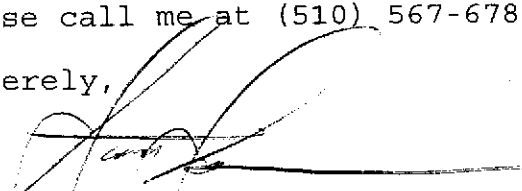
This letter is written to request a written update outlining Xtra Oil's progress in completing the Risk-Based Corrective Action (RBCA) evaluation of the referenced site and surrounding areas. You may recall that we met along with your consultant, Mr. Paul King (P&D Environmental), during July 1996 to discuss the rough scope of this evaluation. Mr. King and I spoke subsequently during November 1996 to discuss the need for an evaluation of yet other potential vapor migration pathways (e.g., sewer trenches, etc.) within Redwood Court. **Although final sampling locations and a map depicting their locations were to be submitted once determined, no further information regarding the RBCA evaluation has been forthcoming.**

On another topic, I am aware that well MW-2 was destroyed in February 1996 to facilitate the widening of Redwood Road at the Castro Valley Boulevard intersection. You were advised that this well was to be replaced in another suitable location. To date, I have not received your plans for this well replacement project.

Please submit a status update regarding the RBCA evaluation and a work plan for well replacement within 45 days of the date of this letter.

Please call me at (510) 567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Mee Ling Tung, Director
Kevin Graves, RWQCB
Paul King, P&D Environmental

1997.05-13 14:06
 510 337 9335
 ALAMEDA CO EHS HAZ-OPS

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
784	8651889 Xtra Oil	05-13 14:06	00'38	01/01	OK		

7499402046

ALAMEDA COUNTY
 HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



May 13, 1997

ENVIRONMENTAL HEALTH SERVICES

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

STID 3747

Mr. Keith Simas
 Xtra Oil Company
 2307 Pacific Avenue
 Alameda, CA 94501

RE: 3495 CASTRO VALLEY BOULEVARD, CASTRO VALLEY - REQUEST FOR
 STATUS UPDATE ON RISK-BASED CORRECTIVE ACTION EVALUATION

Dear Mr. Simas:

This letter is written to request a written update outlining Xtra Oil's progress in completing the Risk-Based Corrective Action (RBCA) evaluation of the referenced site and surrounding areas. You may recall that we met along with your consultant, Mr. Paul King (P&D Environmental), during July 1996 to discuss the rough scope of this evaluation. Mr. King and I spoke subsequently during November 1996 to discuss the need for an evaluation of yet other potential vapor migration pathways (e.g., sewer trenches, etc.) within Redwood Court. Although final sampling locations and a map depicting their locations were to be submitted once determined, no further information regarding the RBCA evaluation has been forthcoming.

On another topic, I am aware that well MW-2 was destroyed in February 1996 to facilitate the widening of Redwood Road at the Castro Valley Boulevard intersection. You were advised that this well was to be replaced in another suitable location. To date, I have not received your plans for this well replacement project.

Please submit a status update regarding the RBCA evaluation and a work plan for well replacement within 45 days of the date of this letter.

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

Alameda County
Environmental Protection Services
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577

CC458

July 15, 1996

STID 3747

Mr. Keith Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: 3495 CASTRO VALLEY BOULEVARD - SUMMARY OF 7/12/96 MEETING
AND ADDITIONAL RISK BASED CORRECTIVE ACTION DATA
ACQUISITION REQUIREMENTS

Dear Mr. Simas:

Thank you and your consultant, Mr. Paul King (P&D Environmental), for meeting with me last Friday, July 12, 1996. We met to broadly discuss the risk based corrective action (RBCA) process to be employed at your Castro Valley site. RBCA will be significantly relied upon in the development of an appropriate corrective action plan (CAP) for this site.

You will recall that we agreed that the RBCA evaluation would focus on three human receptor scenarios based on the location of such potential receptors along the axis of the plume: on- and off-site commercial, and off-site residential. Vapor migration from contaminated soil and ground water into buildings is the apparent primary transport mechanism, with inhalation the probable exposure pathway.

Additional physical data must be collected to facilitate the site-specific Tier 2 RBCA evaluation of this case without having to rely on default values available with the chosen software package (Groundwater Services, Inc. Tier 2 RBCA Tool Kit). Specifically, fractional organic carbon (foc) data will be collected from soil samples collected from unsaturated sediments at two discrete depths at approximately 6 sample locations along the axis of the plume as it extends from the subject site, towards the residential receptors.

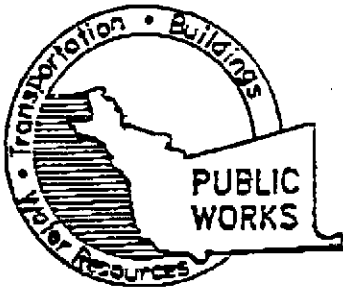
Please provide a map showing the final sample locations and your field activity schedule when it is known. I may be reached at 510/567-6783 should you have any questions.

Sincerely,


Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

Mr. Keith Simas
RE: 3495 Castro Valley Blvd.
July 15, 1996
Page 2 of 2

cc: Mee Ling Tung, Agency Director
Kevin Graves, RWQCB
Paul King, P&D Environmental



COUNTY OF ALAMEDA
 PUBLIC WORKS AGENCY
 399 Elmhurst Street • Hayward, CA 94544-1395
 (510)670-5480

FAX TRANSMITTAL

TO	<i>Scott Seery</i>
	<i>Alameda County Health Agency</i>
	FAX NO. <i>337-9335</i>

DATE *3-8-96*
 JOB NO. *R20084*
Redwood Road

TRANSMITTING THE FOLLOWING:

SHEETS	DATED	TITLE/DESCRIPTION
<i>3</i>	<i>3-5-96</i>	<i>Letter from Acc - Destruction of MW-2 on Redwood Road</i>

NUMBER OF PAGES, INCLUDING THIS PAGE, BEING TRANSMITTED: *4*

FROM: NAME: *Stanley Fung*
 FAX NUMBER: *(510) 782-1939*

IF YOU EXPERIENCE PROBLEMS WITH THIS TRANSMISSION, PLEASE CONTACT:

me AT *(510) 670-5581*

REMARKS: *Please review and let me know if you have any comments. Thanks.*



March 5, 1996

DRAFT

Mr. Stanley Fung
County of Alameda Public Works Agency
399 Elmhurst Street
Hayward, CA 94544

RE: Decommissioning of Groundwater Monitoring Well MW-2
3495 Castro Valley Boulevard, Castro Valley, California
Redwood Road Expansion Project
ACC Job No. 6163-1.1

Dear Mr. Fung:

On behalf of the County Of Alameda Public Works Agency, ACC Environmental Consultants, Inc., (ACC) presents this letter report summarizing the completed work at the above referenced site.

Background

Groundwater monitoring wells were installed at the Shell service station located at 3495 Castro Valley Boulevard to evaluate the extent of groundwater impact from existing and former underground storage tanks (USTs) located at the site. One of the existing groundwater monitoring wells (MW-2) was installed in the approximate downgradient direction of the USTs. The Shell station is located at the intersection of Castro Valley Boulevard and Redwood Road. When the County of Alameda Public Works Agency proposed the Redwood Road - "A" Street widening project, well MW-2 was found to be located within the limits of the planned expanded roadway. In order to create a corridor to allow the expansion of Redwood Road well MW-2 had to be decommissioned.

Well Destruction

As required by the Occupational Health and Safety Administration, 29 Code of Federal Regulations 1910.120, ACC prepared a site specific Health and Safety Plan prior to proceeding with the planned well decommissioning work.

On February 7, 1996, one 4-inch-diameter groundwater monitoring well (MW-2) was decommissioned by overdrilling by Gregg Drilling and Testing, Inc., of Martinez, California (license C57-485165). Permit Number 96082 was obtained from Zone 7 Water Resources Management prior to scheduling field activities and a copy is attached.

Well Completion Report Number 407475 for the decommissioned well was filed with the State of California Department of Water Resources.

Please mention if there are any requirements to close out the permit obtained from Zone 7.

DRAFT

Mr. Stanley Fung
March 5, 1996
Page 2

The well was destroyed by overdrilling and removing all well construction materials within the original borehole. Using a tremie pipe, the created hole was filled from the bottom upward to the original ground surface with a neat cement grout containing 5 percent bentonite by weight.

The following procedures were followed for the well decommissioning:

- Prior to destruction the monitoring well was investigated to determine its condition and the details of construction prior to destruction. The depth, casing diameter, and construction and sealing design of the well were ascertained. The well was sounded immediately before destruction to determine whether any obstructions would interfere with destruction. No obstructions were detected. The total depth of the well was 20 feet below ground surface (bgs).
- All downhole equipment was precleaned prior to drilling the boring.
- The monitoring well was destroyed by removing all materials within the original borehole (including the well casing, screen, filter pack, and annular seal). This was accomplished by overdrilling the borehole with 10-inch outside diameter, hollow stem augers. Annular well materials were removed from the augers as they advanced and were drummed appropriately.
- Overdrilling was completed to the depth of the original boring.
- The reamed boring was then backfilled with a neat cement grout containing 5 percent bentonite by weight as the augers were removed from the boring. The grout was placed into the boring from the bottom of the hole to a depth of approximately 2 feet bgs via a tremie pipe. The boring was then filled to existing grade with concrete and finished to match the surrounding surface.
- The PVC well screen, christy box, and well completion materials were placed in labeled drums and stored temporarily on site. Displaced groundwater generated during grouting of the borehole was also drummed and stored temporarily on site.

During well decommissioning, three 55-gallon drums (two containing soil cuttings and one containing displaced groundwater) of waste materials were generated, a sample was collected from each drum containing the well destruction materials, the two soil samples were combined to make a composite sample, and the samples were analyzed for total lead by EPA Method 3050A/7420, total petroleum hydrocarbons as gasoline (TPHg) with benzene, toluene, ethylbenzene, and total xylenes (BTEX) by EPA Method 5030/8015M/8020, and total petroleum hydrocarbons as diesel (TPHd) by EPA Method 3550/8015M. Laboratory results indicated a concentration of 1,300 mg/kg TPHg and 600 mg/kg TPHd in the composite soil drum sample (D-1,2). As a result, the composite sample was tested additionally for reactivity, corrosivity, and ignitability by method CA Title 22 Sec 66261.21-.24. Analytical results for all the analyses are attached.

DRAFT

Mr. Stanley Fung
March 5, 1996
Page 3

After analytical results were obtained, the drums were profiled for proper disposal. The two drums of soil cuttings were disposed of at the BFI waste disposal facility at 4001 North Vasco Road, Livermore, California, under non-hazardous waste manifest number 782795 (attached). The single drum of displaced non-hazardous groundwater at the site was disposed of at the Seaport Environmental facility in Redwood City, California.

Upon your review and approval of this report, ACC will forward a final copy to Mr. Scott Seery and Mr. Keith Simas.

If you have any questions or comments regarding this letter report or any other comments regarding this project, please call me at (510) 638-8400.

Sincerely,

Misty C. Kaltreider
Project Geologist

David R. DeMent, RG
Senior Geologist

jvc:mcr

Attachments

P & D ENVIRONMENTAL

4020 Panama Court
Oakland, CA 94611
Telephone (510) 658-6916

February 5, 1996
Letter 0014.L52

Mr. Stanley Fung
Associate Engineer for County of Alameda
Public Works Agency
399 Elmhurst Street
Hayward, CA 94544

SUBJECT: Monitoring Well Destruction and Replacement
XTRA OIL Company Facility
3495 Castro Valley Blvd.
Castro Valley, CA

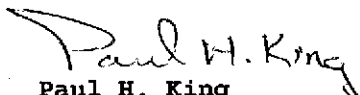
Dear Mr. Fung:

At the request of Mr. Keith Simas of XTRA OIL Company, I am writing this letter to inform you of a telephone conversation I had with Mr. Scott Seery of the Alameda County Department of Environmental Health concerning the subject site. On February 1, 1996 I called Mr. Seery to discuss the pending destruction of well MW2 at the subject site. Mr. Seery stated that he will require a replacement well in the immediate vicinity of existing well MW2 for the continuation of the existing groundwater monitoring and sampling program at the site.

Should you have any questions or comments, please do not hesitate to contact me at (510) 658-6916.

Sincerely,

P&D Environmental


Paul H. King
Hydrogeologist

cc: Mr. Keith Simas, XTRA OIL Company
Mr. Scott Seery, Alameda County Department of Environmental Health
Mr. Herman Fitzgerald, Fitzgerald Law Offices

PHK
0014.L52



FACSIMILE COVER SHEET

TO: SCOTT SEERY

COMPANY: ALA. HEALTH CARE

FAX: (510) 337-9335

COVER PAGE+ 2 PAGES SERV.

FROM: JOHN CONKLIN

SENT BY: -

DATE: 1-31-96

TIME SENT: 3³⁰ pm

RE: _____

COMMENTS:

Original to follow by:

U.S. Mail

Express Overnight Mail

Courier

No Hard Copy to Follow

If you do not receive total numbers of pages as indicated above,
please call (510) 638-8400



January 31, 1996

Mr. Scott Seery
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

RE: ~~Monitoring Well Destruction at 3495~~ Castro Valley Blvd.
Redwood Road Expansion Project

Dear Scott:

As per our conversation this afternoon, I am sending this to confirm with you our intended work at the above referenced property. The destruction of a single monitoring well (MW-2) is scheduled to begin at approximately 9:00 am on Wednesday, February 7, 1996 and should be concluded before the end of the day. The contractor will be Gregg Drilling and Testing of Martinez, CA (Licence: C57-485165).

Sincerely,

John Conklin
Project Environmental Technician

cc: Mr. Keith Simas, 2707 Pacific Avenue, Alameda, CA 94501

ACC
ENVIRONMENTAL
CONSULTANTS

January 31, 1996

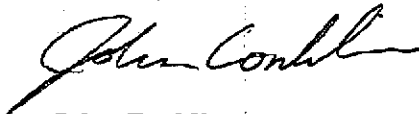
Mr. Keith Simas
2707 Pacific Avenue
Alameda, CA 94501

RE: Monitoring Well Destruction at 3495 Castro Valley Blvd.
Redwood Road Expansion Project

Keith;

As per our conversation this afternoon, I am sending this to confirm with you our intended work at the above referenced property. Work involving the destruction of a single monitoring well (MW-2) is scheduled to begin at approximately 9:00 am on Wednesday, February 7, 1996 and should be concluded before the end of the day. The contractor will be Gregg Drilling and Testing. Care will be taken to avoid blocking access to the property. One (1) to two (2) steel drums containing soil cuttings generated from the well destruction work may need to be stored on the property for a short period prior to their removal. If you have any questions, please call our office at (510)638-8400.

Sincerely,



John Conklin
Project Environmental Technician

cc: Stanley Fung, Alameda County, Public Works Agency
Scott Seery, Alameda County Health Care Services Agency

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

STID 3747

September 15, 1994

Mr. Ted Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

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

RE: 3495 CASTRO VALLEY BOULEVARD, CASTRO VALLEY

Dear Mr. Simas:

I have received and reviewed the August 16, 1994 P&D Environmental (P&D) *Offsite Groundwater Quality Investigation Work Plan* which presents a proposed scope of work for the second phase of the off-site "hydropunch" (HP) investigation. As you are aware, the initial phase of this study was completed during February 1994.

The cited August 16, 1994 P&D work plan has been accepted as submitted.

Please be advised that the report submitted following this latest phase of work must include the submittal of a comprehensive work plan for the installation of a permanent well network designed to monitor the lateral limits of the plume.

Please call me at 510/567-6783 should you have any questions and when field work is scheduled to begin.

Sincerely,

Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Ed Laudani, Alameda County Fire Department
Scott Hooten, BP Oil Company
Paul King, P&D Environmental

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

STID 3747

July 27, 1994

Mr. Ted Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 HARBOR BAY PARKWAY, 2ND FLOOR
ALAMEDA, CA 94502-6577

RE: 3495 CASTRO VALLEY BOULEVARD, CASTRO VALLEY

Dear Mr. Simas:

As you have been made aware through my May 18, 1994 correspondence, I have received and reviewed the April 28, 1994 P&D Environmental (P&D) *Offsite Groundwater Quality Investigation Report* which documents the results of the off-site "hydropunch" (HP) investigation completed in February 1994. The referenced May 18, 1994 correspondence requests the submittal of a work plan for the installation of a permanent well network designed to monitor the lateral limits of the plume, among other requests.

In response, I received the June 17, 1994 P&D *Letter Response* proposing the locations of two permanent well points at the apparent western and southwestern limits of the plume pending further plume definition to the north, northeast and east from the site. The June 17 P&D response further proposes interim remediation measures (i.e., on-site well purging via vacuum truck) pending complete plume definition and development of a Corrective Action Plan (CAP).

Since my review of the referenced P&D response, I have twice had the opportunity to speak with P&D's Paul King. We discussed the need for further plume definition south of HP points P6 and P9, and an additional permanent well point placed proximal to HP points P7 and P8 near Redwood Road. Mr. King suggested that a second phase of HP investigation be performed south of HP points P6 / P9, initially within the head of Redwood Court. This approach appears acceptable, but will require expansion as needed until the plume limits are reasonably defined qualitatively, at which point permanent well points are to be installed.

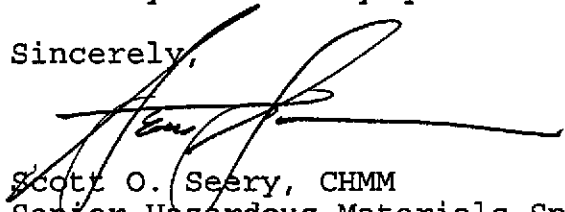
Plume definition must be completed forthwith to enable the timely completion of a permanent, viable well network. Therefore, please submit a work plan with enough flexibility and contingencies to continue the HP assessment as needed without undo delay between each phase of the work. To minimize mobilization costs, I would agree to postpone the installation of this group of off-site wells until the HP qualitative plume definition work has been completed and additional well locations proposed.

Mr. Ted Simas
RE: 3495 Castro Valley Blvd.
July 27, 1994
Page 2 of 2

Please submit the HP investigation work plan within 20 days of the date of this letter.

Please call me at our temporary phone number of 510/337-2866 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Ed Laudani, Alameda County Fire Department
Scott Hooten, BP Oil Company

P & D ENVIRONMENTAL

4020 Panama Court
Oakland, CA 94611
Telephone (510) 658-6916

FAX 658-9074

ALCO
HAZMAT

94 JUN 17 PM 12:43

June 17, 1994
Letter 0014.L26

Mr. Scott Seery
Alameda County Department of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

SUBJECT: LETTER RESPONSE
XTRA OIL Company
3495 Castro Valley Blvd.
Castro Valley, CA

Dear Mr. Seery:

P&D Environmental (P&D) is in receipt of your letter dated May 18, 1994 addressed to Mr. Ted Simas concerning the subject site. In your letter you requested that a work plan be submitted for the installation of off-site groundwater monitoring wells. In addition, you requested that interim remediation measures be implemented for the removal of immiscible phase hydrocarbons and to retard migration of the immiscible phase hydrocarbons from the site.

The locations of two proposed monitoring wells are shown on the attached Site Vicinity Map, Figure 1. The monitoring wells are to confirm the findings of the groundwater quality investigation with respect to the extent of petroleum hydrocarbons in groundwater to the southwest of the subject site. It is not appropriate at this time to install groundwater monitoring wells for remediation purposes because the extent of petroleum hydrocarbon-impacted groundwater has not been determined to the north, northeast and east of the subject site. Once the extent of groundwater contamination in the vicinity of the subject site has been defined, it will then be appropriate to prepare a Corrective Action Plan to address the petroleum hydrocarbon-impacted groundwater. Following your approval of the proposed groundwater monitoring well locations, a work plan for the installation of the groundwater monitoring wells will be submitted for your review.

Following the reported presence of sheen in well MW2 at the subject site on May 18, 1993, it is P&D's understanding that XTRA OIL Company initiated immiscible phase hydrocarbon recovery remediation measures by using petroleum hydrocarbon-absorbent socks. It is P&D's understanding that use of the absorbent socks has continued until the present. The results of the most recent quarterly monitoring and sampling performed by P&D at the subject site on May 19, 1994 indicate that the hydrocarbon recovery remediation measures have successfully remediated to a sheen the immiscible phase petroleum hydrocarbons previously detected in wells at the site.

To retard the movement of petroleum hydrocarbon-impacted groundwater from the subject site, P&D proposes that the existing wells at the subject site be purged of groundwater on a monthly basis using a vacuum truck. Quantities of water removed and the dates of removal will be transmitted with future quarterly reports for the site.

except that no downgrad. wells are implacated - FP could have just moved away

*Discussed w/ PD 6/20.
FAXed copy of BP w.p.
Quarantined pt. near P&D
and PB. Will discuss
w/ PD, and speak to
me later*

June 17, 1994
Letter 0014.26

2

Should you have any questions, please do not hesitate to contact me at
(510) 658-6916.

Sincerely,

P&D Environmental



Paul H. King
Hydrogeologist

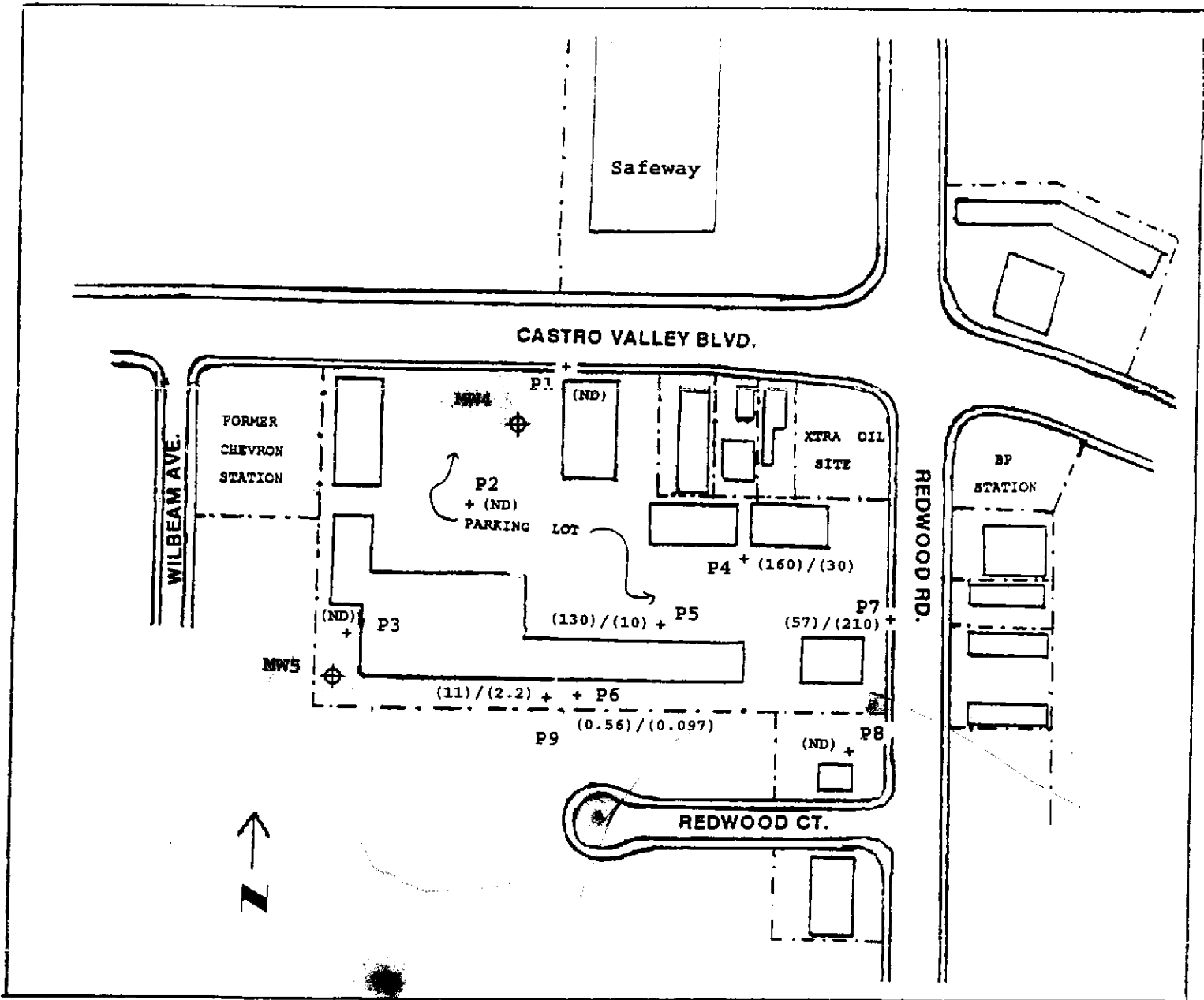
Attachment: Site Vicinity Map, Figure 1

PHK
0014.L26

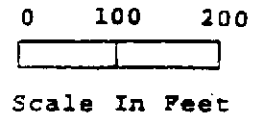
cc: Mr. Ted Simas and Mr. Keith Simas, XTRA OIL Company

P & D ENVIRONMENTAL

4020 Panama Court
 Oakland, CA 94611
 Telephone (510) 658-6916



- LEGEND**
- Buildings/Structures
 - Property Lines
 - Proposed Groundwater Monitoring Well Location
 - Groundwater Grab Sample Collection Location
 - $(11) / (2.2)$ Groundwater TPH-G/TPH-D Concentration in Parts Per Million (PPM)
 - (ND) TPH-G and TPH-D Were Not Detected in Groundwater



Base Map From
 XTRA OIL Company
 November, 1993

Figure 1
 SITE VICINITY MAP
 XTRA OIL Company
 3495 Castro Valley Blvd.
 Castro Valley, California

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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 3747

May 18, 1994

Mr. Ted Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: 3495 CASTRO VALLEY BOULEVARD, CASTRO VALLEY

Dear Mr. Simas:

This office is in receipt and has completed review of the April 28, 1994 P&D Environmental (P&D) *Offsite Groundwater Quality Investigation Report*, submitted under Xtra Oil Company cover dated May 10, 1994. This report presents data representing the results of the off-site "hydropunch" survey conducted by P&D during February 1994. These data clearly indicate fuel hydrocarbons are present in both dissolved and immiscible phases in ground water sampled from points located at some distance south and southwest of the subject site.

Your attention is directed towards the January 7, 1994 correspondence from this office in which approval for the "hydropunch" work plan was given, among other topics covered. The cited letter additionally advises you that this (hydropunch) phase of the investigation was developed to aid in the siting of an appropriate array of off-site monitoring wells. Hence, a work plan for the placement of such wells is now due for submittal.

Further, interim remediation measures are warranted and must be implemented at this time to retard the rate at which contaminants, particularly immiscible phase (IP) hydrocarbons, migrate away from your site. The timely removal of such IP hydrocarbons is a minimum objective, and must be implemented *immediately*. A Corrective Action Plan (CAP) must also be developed in short order to affect the long-term goal of site restoration. Your attention is directed towards Article 11 of Title 23, California Code of Regulations, for the steps involved in development and implementation of a CAP.

Please submit an off-site well installation work plan within **30 days** of the date of this letter, or by **June 17, 1994**. Please bear in mind that well placement strategies must not only reflect the requirement for plume definition, but also to facilitate interim and final remediation measures.

Mr. Ted Simas
RE: 3495 Castro Valley Blvd.
May 18, 1994
Page 2 of 2

Please call me at 510/271-4530 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Ed Laudani, Alameda County Fire Department
Paul King, P&D Environmental

STATE WATER RESOURCES CONTROL BOARD

DIVISION OF CLEAN WATER PROGRAMS

2014 T STREET, SUITE 130

P.O. BOX 944212

SACRAMENTO, CALIFORNIA 94244-2120

(916) 227-4307

(916) 227-4530 FAX

37103747
SS

MAR 15 1994



Xtra Oil Company
Mr. Ted Simas
2307 Pacific Avenue
Alameda, CA 94501

Site: Xtra Oil Company
3495 Castro Valley Boulevard
Castro Valley, CA 94546

UNDERGROUND STORAGE TANK CLEANUP FUND, CLAIM NO. 001068

The State Water Resources Control Board (State Board) takes pleasure in issuing the attached Letter of Commitment in an amount not to exceed **\$105,000**. This Letter of Commitment is based upon our review of the corrective action costs incurred to date and your application received on January 16, 1992 and may be modified by the State Board in writing by an amended Letter of Commitment.

The State Board will take steps to withdraw this Letter of Commitment after 90 calendar days from the date of this transmittal letter unless you proceed with due diligence with your cleanup effort. This means that you must take positive, concrete steps to ensure that corrective action is proceeding with all due speed. For example, if you have not started your cleanup effort, you must obtain three bids and sign a contract with one of these bidders within 90 calendar days. If your cleanup effort has already started and was delayed, you must resume the expenditure of funds to ensure that your cleanup is proceeding in an expeditious manner. You are reminded that you must comply with all regulatory agency time schedules and requirements. We constantly review the status of all active claims, and failure to proceed with due diligence will be grounds for withdrawal of this Letter of Commitment.

You should read the terms and conditions listed in the Letter of Commitment. Also attached you will find:

- A "Reimbursement Request Instructions" package. You should retain this package for future reimbursement requests. Among other information, the package includes instructions for completion of the "Reimbursement Request" form and the "Spreadsheet". These instructions must be followed when seeking reimbursement for corrective action costs incurred after January 1, 1988. Included in these instructions are samples of Reimbursement Request forms and completed Spreadsheets. Within the package also included are:
 - A "Bid Summary Sheet" to document data on bids received.
 - Recommended Minimum Invoice Cost Breakdown.
 - A "Certification of Non-Recovery From Other Sources" which must be returned before any reimbursements can be made.
- "Reimbursement Request" forms which you must use to request reimbursement of costs incurred.
- "Spreadsheet" forms which you must use in conjunction with your Reimbursement Request.
- "Vendor Data Record" (Std. Form 204) which must be completed and returned with your first Reimbursement Request.

If you have any questions regarding the Letter of Commitment or the Reimbursement Request package, please contact Blessy Torres at (916) 227-4535.

Sincerely,

Dave Deaner, Manager
Underground Storage Tank
Cleanup Fund Program

Attachments

cc: California Regional Water Quality
Control Board, San Francisco Bay Region
Attn: Steven Ritchie
2101 Webster Street, Suite 500
Oakland, CA 94612

Alameda County EHD
Attn: Tom Peacock
80 Swan Way, Room 200
Oakland, CA 94621

LETTER OF COMMITMENT FOR REIMBURSEMENT OF COSTS

CLAIM NO: 001068

AMENDMENT NO: 0

CLAIMANT: Xtra Oil Company
CO-PAYEE:

BALANCE FORWARD: \$0

THIS AMOUNT: \$105,000

CLAIMANT ADDRESS: 2307 Pacific Avenue
Alameda, CA 94501

NEW BALANCE: \$105,000

TAX ID / SSA NO.: 94-2187649

Subject to availability of funds, the State Water Resources Control Board (State Board) agrees to reimburse Xtra Oil Company (Claimant) for eligible corrective action costs at 3495 Castro Valley Boulevard, Castro Valley, CA 94546 (Site). The commitment reflected by this Letter is subject to all of the following terms and conditions:

1. Reimbursement shall not exceed \$105,000 unless this amount is subsequently modified in writing by an amended Letter of Commitment.
2. The obligation to pay any sum under this Letter of Commitment is contingent upon availability of funds. In the event that sufficient funds are not available for reasons beyond the reasonable control of the State Board, the State Board shall not be obligated to make any disbursements hereunder. If any disbursements otherwise due under this Letter of Commitment are deferred because of unavailability of funds, such disbursements will promptly be made when sufficient funds do become available. Nothing herein shall be construed to provide the Claimant with a right of priority for disbursement over any other claimant who has a similar Letter of Commitment.
3. All costs for which reimbursement is sought must be eligible for reimbursement and the Claimant must be the person entitled to reimbursement thereof.
4. Claimant must at all times be in compliance with all applicable state laws, rules and regulations and with all terms, conditions, and commitments contained in the Claimant's Application and any supporting documents or in any payment requests submitted by the Claimant.
5. No disbursement under this Letter of Commitment will be made except upon receipt of acceptable Standard Form Payment Requests duly executed by or on behalf of the Claimant. All Payment Requests must be executed by the Claimant or a duly authorized representative who has been approved by the Division of Clean Water Programs.
6. Any and all disbursements payable under this Letter of Commitment may be withheld if the Claimant is not in compliance with the provisions of Paragraph 5 above.
7. Neither this Letter of Commitment nor any right thereunder is assignable by the Claimant without the written consent of the State Board. In the event of any such assignment, the rights of the assignee shall be subject to all terms and conditions set forth in this Letter of Commitment and the State Board's consent.
8. This Letter of Commitment may be withdrawn at any time by the State Board if completion of corrective action is not performed with reasonable diligence.

IN WITNESS WHEREOF, this Letter of Commitment has been issued by the State Board this 7th day of March, 1994.

STATE WATER RESOURCES CONTROL BOARD

BY [Signature]
Manager, Underground Storage Tank Cleanup Fund Program

BY [Signature]
Chief, Division Administrative Services

STATE USE :
CALSTARS CODING :
0550 - 569.02 - 30530

\$

P & D ENVIRONMENTAL

300 Monte Vista, #101
Oakland, CA 94611
Telephone (510) 658-6916

██████████
Letter 0014.L16

Mr. Scott Seery
Alameda County Department of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

**SUBJECT: OFFSITE GROUNDWATER QUALITY INVESTIGATION AND
TANK CLOSURE REPORT STATUS**

██████████
██████████
Castro Valley, CA

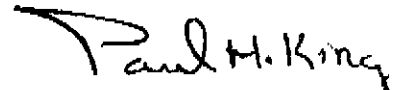
Dear Mr. Seery:

P&D Environmental (P&D) is receipt of your letter dated January 7, 1994 addressed to Mr. Ted Simas concerning the subject site. This letter is written to inform you that it is P&D's understanding that XTRA OIL Company is presently engaged in obtaining permission for access to adjacent properties from the offsite property owners so that the offsite groundwater quality investigation can be performed. This letter is also written to inform you that P&D has been retained by XTRA OIL Company to complete the tank closure report for the subject site. P&D anticipates that this report will be completed within 30 days from the date of this letter.

Should you have any questions, please do not hesitate to contact me at (510) 658-6916.

Sincerely,

P&D Environmental



Paul H. King
Hydrogeologist

PHK
0014.L16

cc: Mr. Ted Simas and Mr. Keith Simas, XTRA OIL Company



BP OIL

BP Oil Company
16400 Southcenter Parkway, Suite 301
Tukwila, Washington 98188
(206) 575-4077

ALCO
HAZMAT
94 JAN 24 PM 2:21

January 7, 1994

XTRA Oil Company
Attention Mr. Ted Simas
2307 Pacific Avenue
Alameda, CA 94501

RE: Shell Service Station
3495 Castro Valley Boulevard
Castro Valley, CA

Dear Mr. Simas:

BP has been performing assessment and monitoring activities at its service station facility located at 3515 Castro Valley Boulevard. This facility is located to the east of the above-captioned location, across Redwood Road. The assessment activity was performed during late 1992 in order to obtain baseline soil and groundwater chemical data for a potential property transaction. Data from BP's assessment work indicates that a petroleum release from your facility has impacted our station.

Because of this development, BP may incur additional assessment and remediation costs associated with the release from your facility. This letter is to put you on notice that BP intends to hold you responsible for any costs, expenses, or other damages BP may incur as a result from the release from your facility.

BP believes that it would be in our mutual best interests to coordinate our respective remediation and/or assessment activities in order to minimize the time and expense associated with this matter. I welcome your thoughts on this suggestion. Please feel free to give me a call at (206) 251-0667.

I look forward to a response at your earliest convenience.

Sincerely,

Scott T. Hooton
Environmental Resources Management

cc: site file 11105
C. Pinzone, Esq.
S. Seery - Alameda County Health Care Services Agency

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

STID 3747

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

January 7, 1994

Mr. Ted Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: 3495 CASTRO VALLEY BOULEVARD, CASTRO VALLEY

Dear Mr. Simas:

This office is in receipt and has completed review of the December 10, 1993 P&D Environmental work plan for the first phase of off-site ground water assessment required at this site. This work plan, submitted under Xtra Oil Company cover dated December 20, 1993, proposes the advancement of soil borings in nine locations, south and west of the site, from which grab ground water samples will be collected through perforated, galvanized steel pipes driven into the saturated zone. Each sample will be analyzed for the presence of motor vehicle fuel constituents.

This work plan has been accepted as submitted. Please be reminded that this phase of the off-site investigation was developed to cost-effectively assist in the siting of permanent wells. A work plan proposing permanent well locations shall accompany the report documenting the results of this initial phase of work. This report/work plan is due for submittal within 45 days following completion of field activities associated with this phase of work.

Further, Xtra Oil Company should be in the development stages of an appropriate, viable corrective action plan (CAP), pursuant to Article 11 of Title 23, California Code of Regulations (CCR). A "generalized" remediation plan submitted by K&B Environmental was accepted by this office "in principle" on June 4, 1992. This plan, submitted in anticipation of tank closure and replacement, included the installation and operation of a ground water/soil treatment system.

We understand that some ground water extraction plumbing was installed during the 1992 station rebuild, yet no move towards completing the system has been affected since. Please be advised that a final, site-specific CAP must be submitted shortly after completion of off-site assessment. Plume control is the minimum objective of such a plan. Your attention is directed towards Article 11, 23CCR, for the specific elements of such a plan.

Mr. Ted Simas
RE: 3495 Castro Valley Boulevard
January 7, 1994
Page 2 of 2

Incidentally, nearly 18 months have passed since the July 1992 closure of the former fuel tanks, yet no final closure report has been submitted. This report has been requested on several occasions. Correspondence from this office dated January 12, 1993 memorializes a conversation shared with Mr. Paul King of P&D Environmental during which this office was advised that Mr. Kip Porter, K&B Environmental, the consultant managing the closures, had recently been contacted. It was anticipated that the final report would be forthcoming.

Please be advised that, by failing to submit this report, Xtra Oil Company is in violation of California Health and Safety Code Section 25298(c)(4) for failure to complete closure by demonstrating to this agency the appropriateness of remedial activities occurring subsequent to tank removal (e.g., sample results following overexcavation, etc.). Such violations may subject Xtra Oil Company to fines of up to \$5000 per day of violation upon conviction.

Please contact this office when field work is slated to begin, or should you have any questions about the content of this letter.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Ed Laudani, Alameda County Fire Department
Paul King, P&D Environmental

P & D ENVIRONMENTAL

300 Monte Vista, #101
Oakland, CA 94611
Telephone (510) 658-6916

FAX TRANSMITTAL COVER SHEET

Date: 10/21/93 Job #: _____

To: Mr. Scott Seery

Company: Alameda County

From: Paul H. King
P&D ENVIRONMENTAL

Number of pages in this transmittal, including this cover sheet: 2

SUBJECT: XTRA OIL - Castro Valley

MESSAGE: Scott,

FYI

- Paul H. King

If transmittal is incomplete, please call (510) 658-6916.
P&D Environmental fax number: (510) 658-6916.

DESTINATION FAX NUMBER: 569-4757

P & D ENVIRONMENTAL

300 Monte Vista, #101
Oakland, CA 94611
Telephone (510) 658-6916

October 21, 1993
Letter 0015.L13

Mr. Scott Seery
Alameda County Department of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

SUBJECT: GROUNDWATER INVESTIGATION WORKPLAN PREPARATION
XTRA OIL Company
3495 Castro Valley Blvd.
Castro Valley, CA 94546

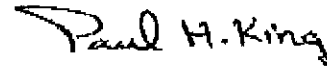
Dear Mr. Seery:

This letter is written to inform you that P&D Environmental (P&D) has been retained by XTRA OIL Company to perform an offsite groundwater investigation in the vicinity of the subject site. P&D anticipates that the workplan for the investigation will be submitted to you by mid-November, 1993.

Should you have any questions, please do not hesitate to contact me at (510) 658-6916.

Sincerely,

P&D Environmental



Paul H. King
Hydrogeologist

PHK
0014.L13

cc: Messrs. Ted and Keith Simas, XTRA OIL Company



Project No. S8037
June 25, 1993

Alameda County, Department of Environmental Health
80 Swan Way, Room 200
Oakland, California 94621

Attention: Mr. Scott Seery

Subject: 3495 CASTRO VALLEY BOULEVARD
CASTRO VALLEY, CALIFORNIA
UPDATE LETTER

Dear Mr. Seery

Following is a letter presenting a project update and a tentative schedule for additional assessment.

During a meeting on March 30, 1993 we discussed the implementation of a limited hydropunch assessment that would be performed to the west and south of the Xtra Oil Company Site. It was anticipated that the assessment would be performed on a "grid" pattern with the intention of establishing a "zero" line in these areas. It was also discussed during our meeting that assessment to the east and north would not be required at this time.

To remain in compliance with requirements set forth by the State Underground Storage Tank Funding Program (SB-2004) Xtra Oil is currently soliciting proposals from qualified firms to prepare the required workplan and implement the field portion of the additional assessment. It is anticipated that a qualified consultant/engineer will be selected by July 16, 1993. Based upon the proposed technical elements required to perform the additional assessment, it is anticipated that a workplan would be submitted to your office by July 26, 1993.

It has come to Geocon's attention that a series of underground storage tanks were recently removed from the Chevron Station located approximately 500 feet west of the Xtra Oil Site. It is Geocon's understanding that little information exists concerning the history of this site, and that visual observations of soil and floating product at the time of tank removal indicated the potential for significant petroleum hydrocarbon impact to the subsurface.

Our original concerns regarding a potential contribution from the BP Station apply equally to the Chevron Site. Xtra Oil acknowledges that there has been a release on their site and is actively proceeding with appropriate measures to assess the boundary of the potential "plume" originating from their site. In as much as there is a potential for contribution from at least two offsite sources (Chevron and BP), it is Xtra Oil's intention to proceed with the hydropunch assessment as discussed in our last meeting. However, in light of the potential for significant offsite hydrocarbon impact from the Chevron Site, Xtra Oil intends to limit the number of sample locations between the Chevron Site and the area south of their Site.

The extent has already been limited following the 3/30/93 meeting, for essentially the same reasons.

Proposal No. S-1068
June 25, 1993

If water collected from these locations appears to be impacted, we would request that no further assessment be performed until more information regarding the scope and extent of hydrocarbon impact from the Chevron Site is fully ascertained. A more detailed description of the proposed technical elements of Xtra Oil's plan will be presented in the pending workplan.

If you have any questions concerning the contents of this letter or if you need additional information, please call me at (916) 852-9118.

Very truly yours,

GEOCON ENVIRONMENTAL CONSULTANTS



Dave A. Diem
Manager, Environmental Services

cc: XTRA Oil, Attn: Mr. Ted Simas
Normoyle & Newman, Attn: Ms. Mary Ann Aguirre, esq.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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 3747

March 4, 1993

Mr. Ted Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: 3495 CASTRO VALLEY BOULEVARD, CASTRO VALLEY

Dear Mr. Simas:

This letter follows a meeting March 2, 1993 with Paul King of P & D Environmental and your son, Kieth Simas. During our meeting we briefly discussed the February 9, 1993 Taber Consultants correspondence submitted on Xtra Oil's behalf in response to the January 12, 1993 request from this office for a soil and water investigation (SWI) work plan, among other elements.

The cited February 9 Taber Consultants correspondence stated that there is "... insufficient data concerning the hydraulic characteristics of this site to accurately and cost-effectively perform additional assessment." This statement appears to be based upon the recent (November 13, 1992) gradient determination which indicates a northeasterly "flow," which may have been perceived by Taber as a discrepancy in flow direction. Review of historical gradient information generated during the period from February 1990 through July 1991, however, indicates that, although a southeasterly flow direction is most prevalent, flow was calculated in a northeasterly direction during three, and to the south-southwest during one, of the 12 monitoring events of this period.

The gradient below this site is quite flat (< 0.01 ft/ft). In such environments, sharp gradient determinations are not always possible. There is no clear, consistent "down hill" direction. The apparent gradient likely changes often as a result of a variety of factors. Water movement is expected to be quite slow in the low transmissivity sediments underlying this site.

Consequently, molecular dispersion, as opposed to advection, is the likely mechanism responsible for the high levels of gasoline and diesel fuel compounds found in each of the wells, even that well located most "upgradient" of the former tank cluster, MW-1. Four more months of gradient determinations will not assist in a more accurate assessment. The direction that the SWI will necessarily need to encompass is a 360° arc about the site.

Mr. Ted Simas
RE: 3495 Castro Valley Blvd.
March 4, 1993
Page 2 of 2

Two tasks were discussed at the March 2 meeting, as follows:

- 1) Resurvey the wells with respect to Mean Sea Level (MSL), and compare these new data with the ground water measurements recently recorded during the November 13, 1992 monitoring event;
- 2) Perform a qualitative off-site assessment (e.g., "Hydropunch," etc.) as a preliminary phase of the SWI. The Hydropunch survey will provide a snapshot view of the problem, and will allow a more cost-effective placement of permanent wells.

As discussed March 2, please submit a **brief** work plan describing the scope of work associated with this preliminary phase of the SWI. This work plan is due within two weeks of the date of this letter, **or by March 19, 1993**. Please also have the wells resurveyed during this same period. The next quarterly report should note this change in the relative elevation datum, and a comparison of the "new" versus "old" gradient determination made, if applicable.

Please call me at 510/271-4320 should there be any questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Rich Hiett, RWQCB
Bob Bohman, Castro Valley Fire Department
Paul King, P & D Environmental
Dave Diem, Taber Consultants, 536 Galveston Street
West Sacramento, CA 95691
Ed Howell - files

Taber
Since 1954

536 Galveston Street
West Sacramento, CA 95691
(916) 371-1690
(707) 575-1568
Fax (916) 371-7265

discussed w/ Kirtz Simas
Paul King (PrD) 3/2/93
SOS

92 FEB 10 11:00 AM '93

February 9, 1993

Edward T. Simas, President
Xtra Oil Company
2307 Pacific Avenue
Alameda, California 94501

Subject: Technical Evaluation
Shell Service Station
Castro Valley, California

2P3/392/77

Dear Mr. Simas:

Pursuant to your verbal request, we have reviewed information provided by your office pertaining to past events that have occurred at the above site. Included in our review is a letter from the Alameda County Department of Environmental Health (ACDEH) dated January 12, 1992. The letter has requested that additional offsite assessment be performed to determine the "Zero Line" of potential groundwater contamination. Based upon our review, we present the following comments and recommendations.

- Three monitoring wells were installed at the subject site by Western Geo Engineers (WEGE) on February 14, 1990. At that time the well casings were surveyed for relative elevations for future assessment of groundwater flow direction and gradient. Based upon the relative elevation survey, groundwater flow direction was consistently calculated to be flowing to the southeast. It is our understanding that the survey was performed by WEGE.
- In order to upgrade the facility to comply with current UST regulations, four single walled steel tanks were removed during August 1992, and replaced with fiberglass double walled tanks. The removal and installation of the USTs were performed by Walton Engineering of West Sacramento, California.

Taber Consultants
Engineers and Geologists

- During the course of construction it was necessary to alter the overall site topography thereby altering the length of the monitoring wells. Because a portion of the wells had been removed the wells were re-surveyed by Andreas Deak - - a registered surveyor. When the new well elevations were used to calculate the flow direction, the groundwater appeared to be flowing northeast.

- On January 12, 1993 Scott Seery of the ACDEH requested that additional off-site assessment be performed to help evaluate the "Zero Line" for potential groundwater contamination. He has requested a workplan to implement the field program to be provided to his office by February 12, 1993.

It is our opinion, based upon work done to-date that there is insufficient data concerning the hydraulic characteristics of this site to accurately and cost-effectively perform additional assessment. There appears to be a discrepancy concerning groundwater flow direction. This discrepancy may be due to seasonal variations, error in prior surveying techniques or a combination of both. We therefore, recommend that an active groundwater measuring program be implemented on a monthly basis for at least 4 months prior to implementation of a off-site assessment program. Obtaining additional information concerning current groundwater flow directions will facilitate a more complete and accurate off-site assessment. Once we have a greater sense of confidence in the groundwater conditions, we would prepare a workplan to assess the offsite condition and present such to Mr. Seery. At this point there seems to be too much ambiguity in available information to allow a technically cost-effective site assessment to proceed.

When additional data has been accumulated concerning the hydraulic characteristics of the site, we would request a site meeting with Mr. Seery and yourself to discuss potential locations for off-site assessment. We are recommending that field work at this site be postponed for a short period because of special site-specific circumstances including a potential deviation of a six year drought and the presence of several potentially contaminated sites immediately adjacent to the subject site.

XTRA Oil
February 9, 1993
Page 3

Taber
Since 1954
2P3/392/77

We are available at any time to discuss the above information and recommendations with yourself and Mr. Seery. If you have any questions or require additional information concerning this letter, please give me a call at (916) 371-1690.

Very truly yours,

TABER CONSULTANTS



Dave A. Diem
Manager, Environmental Services

cc: Mr. Scott Seery, ACDEH
Mr. Bernard F. Rose, esq., Randick & O'Dea

907-111-1111

XTRA OIL COMPANY
2307 PACIFIC AVE.
ALAMEDA, CA 94501

February 12, 1993

Environmental Health
Hazardous Materials Division
60 Swan Way, Room 200
Oakland, CA 94621


Attention: Scott Seery

Regarding: 3495 Castro Valley Blvd.
Castro Valley

Dear Mr. Seery,

Please find enclosed Technical Evaluation for the above mentioned site as requested in your letter of January 12, 1993.

Very truly yours,



Keith Bines

Enclosure

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



HAZMAT

SW AUG 10 PM 11:27

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

STID 3747

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

January 12, 1993

Mr. Ted Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: 3495 CASTRO VALLEY BOULEVARD, CASTRO VALLEY

Dear Mr. Simas:

Thank you for the recent submittal of the December 8, 1992 P & D Environmental (P & D) quarterly ground water monitoring report, as submitted under Xtra Oil Company cover dated December 31, 1992. This report documents the results of sampling and monitoring activities occurring at the site during November 1992, the first such activities following closure of the former underground storage tanks (UST) during July 1992.

The cited report indicates the wells were resurveyed during December. A comparison of the "new" wellhead elevations with those presented in previous reports indicates an approximate 24 foot elevation change between the two (e.g., MW1 - 200.00 vs. 175.73 feet). Such a significant difference in surveyed elevations cannot be accounted for by the slight changes in grade commensurate with the station rebuild. There is no information contained in the cited report indicating that the wells have been surveyed relative to mean sea level (MSL).

Please submit copies of the original surveyor's report and site map which indicate the location of the county datum used for the survey, and that indicate each surveyed point is relative to MSL. Should the wells not be surveyed to MSL, this will have to be done.

The cited report also details the results of the November 1992 water sample analyses. The data indicate a reduction in TPH-diesel contamination noted in all wells as compared with the previous sampling event in May 1992. However, measured TPH-gasoline and BTEX concentrations in these same wells have not attenuated to any noteworthy extent. Although it was hoped that significant reductions in contaminant concentrations would have been realized following the extraction of several thousand gallons of ground water during UST closure, it may still be too early to see the full effect of this "interim" ground water remediation measure.

Mr. Ted Simas
RE: 3495 Castro Valley Blvd., Castro Valley
January 12, 1993
Page 2 of 3

I understand from recent conversations with Mr. Paul King (P & D) that Mr. Kip Porter, K & B Environmental, the consultant overseeing the UST replacement and soil excavation activities, has recently been contacted. Mr. King has indicated that he anticipates the receipt of information associated with the UST closure activities, and that a final UST closure report may soon be completed.

The requirement to fully characterize the extent of the contaminant plume has been an issue for at least the last two years. In correspondence from this office dated December 27, 1990, you were requested to have your consultant submit a work plan for the installation and testing of an appropriate number of off-site wells. In response to this request, a brief work plan for the performance of a preliminary geophysical survey was submitted by the California Geophysical Group, Inc. (CGG) in January 1991. A letter from this office requesting additional information was issued on April 19, 1991. Following review of CGG's response dated June 7, 1991, the scope of this preliminary survey was approved verbally during a phone conversation with CGG's John Cussen on June 12, 1991. To our knowledge, the noted survey was never conducted, and the required off-site wells never installed.

Pursuant to Section 2724 of Article 11, Title 23, California Code of Regulations (CCR), you are directed to submit a soil and water investigation (SWI) work plan for the installation of additional wells. Such wells are to be in sufficient number and adequately located as to define the full extent of the contaminant plume originating from your site. All RWQCB technical and professional criteria for such work plans are to be followed. **This work plan is due within 30 days of the date of this letter, or by February 12, 1993.**

Please be advised that, pursuant to Section 2725(b) of 23CCR, a corrective action plan (CAP) must be developed once the extent of the problem has been characterized following the completion of the SWI. In development of the CAP, the plan must address, among other elements, the following:

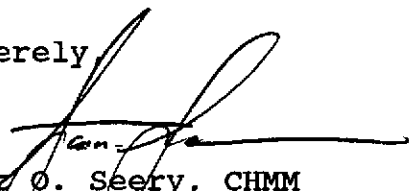
- o assessment of the impacts
- o feasibility study
- o applicable cleanup levels
- o proposed schedule for implementation of the proposed actions

Mr. Ted Simas
RE: 3495 Castro Valley Blvd., Castro Valley
January 12, 1993
Page 3 of 3

You should begin preparing for the development and implementation of the requisite CAP.

Please call me at 510/271-4320, or -4530, should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Rich Hiett, RWQCB
Bob Bohman, Castro Valley Fire Department
Paul King, P & D Environmental
Ed Howell - files *EPH*

white -env.health
 yellow -facility
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
 Oakland, CA 94621
 (415) 271-4320

Hazardous Materials Inspection Form

II, III

Site ID # _____ Site Name Xtra Oil Today's Date 7/29/92

II.A BUSINESS PLANS (Title 19)

- ___ 1. Immediate Reporting 2703
- ___ 2. Bus. Plan Stds. 25503(b)
- ___ 3. RR Cars > 30 days 25503.7
- ___ 4. Inventory Information 25504(a)
- ___ 5. Inventory Complete 2730
- ___ 6. Emergency Response 25504(b)
- ___ 7. Training 25504(c)
- ___ 8. Deficiency 25505(a)
- ___ 9. Modification 25505(b)

II.B ACUTELY HAZ. MATLS

- ___ 10. Registration Form Filed 25533(a)
- ___ 11. Form Complete 25533(b)
- ___ 12. RMPP Contents 25534(c)
- ___ 13. Implement Sch. Req'd? (Y/N)
- ___ 14. OffSite Conseq. Assess. 25524(c)
- ___ 15. Probable Risk Assessment 25534(d)
- ___ 16. Persons Responsible 25534(g)
- ___ 17. Certification 25534(f)
- ___ 18. Exemption Request? (Y/N) 25536(b)
- ___ 19. Trade Secret Requested? 25538

III. UNDERGROUND TANKS (Title 23)

- General**
- ___ 1. Permit Application 25284 (H&S)
- ___ 2. Pipeline Leak Detection 25292 (H&S)
- ___ 3. Records Maintenance 2712
- ___ 4. Release Report 2651
- ___ 5. Closure Plans 2670
- ___ 6. Method
- 1) Monthly Test
- 2) Daily Vadose
- Semi-annual groundwater
- One time soils
- 3) Daily Vadose
- One time soils
- Annual tank test
- 4) Monthly Groundwater
- One time soils
- 5) Daily Inventory
- Annual tank testing
- Cont pipe leak det
- Vadose/groundwater mon.
- 6) Daily Inventory
- Annual tank testing
- Cont pipe leak det
- 7) Weekly Tank Gauge
- Annual tank testing
- 8) Annual Tank Testing
- Daily Inventory
- 9) Other _____
- ___ 7. Prets Tank Test Date: 2643
- ___ 8. Inventory Rec. 2644
- ___ 9. Soil Testing 2646
- ___ 10. Ground Water. 2647
- Monitoring for Existing Tanks**
- ___ 11. Monitor Plan 2632
- ___ 12. Access. Secure 2634
- ___ 13. Plans Submit Date: 2711
- ___ 14. As Built Date: 2635
- New Tanks**

Site Address 3495 Castro Valley Blvd
 City Castro Valley Zip 94546 Phone _____

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- ___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- ___ III. Underground Tanks

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

on site to witness excavation of islands and piping runs. The south half had been uncovered the day before. Because of the tangle of product/vapor lines and utility conduits in the fuel island area, the contractor had already excavated the south 1/2 to an approximate depth of 3-3 1/2 feet BG, where a stiff, "black" clay was uncovered. The entire fuel island area was then excavated to the same depth. Five (5) fuel islands and associated piping (3 generations?) were removed; the 5th island was one abandoned during or before 1984. Two (2) samples were collected from below each island, 10 samples total. Samples will be analyzed based on the product dispensed from the islands (i.e., TPH-G, BTEX; or, TPH-G/D, BTEX)

7/30/92 Note: Apparent diesel-saturated soil was encountered in areas of the 3 most northerly islands.

Contact: _____
 Title: _____
 Signature: Ted Linn

Inspector: S. Seef
 Signature: _____

II, III

Xtra 01
2475 Castro Valley Blvd.

MEMO to file:

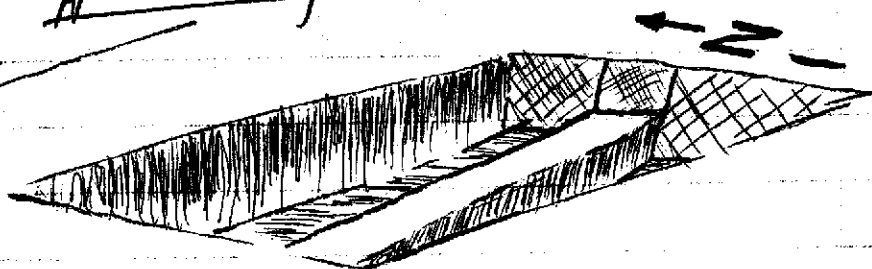
7-21-92

On-site to observe pumping of UST pit. A 5,000 gallon pump truck from H's H Ship Service was on-site. He pumped ~5,000 gallons of GW from the pit, dropping the water level in-situ about 3 feet. FP was also removed from the water's surface.

Two (2) perforated casings, ^{ZVC} 20' lengths, were placed into the hole and stabilized with ropes pending the filling of the UST pit with gravel. One casing was an 8" diameter, the other 4".
* Both casings were hand drilled to make the perforations.

During overexcavation of the tank pit, only the south and north ends of the pit were accessible to the excavator because of soil stock piles ~~to~~ to the east limiting access from this direction, and the new USTs laying to the west. As a result, a "ridge" of native soil running the width of the pit east-to-west remains at a depth of approximately 14-16' BG.

CV Blvd



Redwood Road

white -env.health
 yellow -facility
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH
 Hazardous Materials Inspection Form

80 Swan Way, #200
 Oakland, CA 94621
 (415) 271-4320

II, III

Site ID # _____ Site Name Xtra Oil Today's Date 7/17/92

II.A BUSINESS PLANS (Title 19)

- ___ 1. Immediate Reporting 2703
- ___ 2. Bus. Plan Sids. 25503(b)
- ___ 3. RR Cars > 30 days 25503.7
- ___ 4. Inventory Information 25504(a)
- ___ 5. Inventory Complete 2730
- ___ 6. Emergency Response 25504(b)
- ___ 7. Training 25504(c)
- ___ 8. Deficiency 25505(a)
- ___ 9. Modification 25505(b)

Site Address 3495 CV Blvd

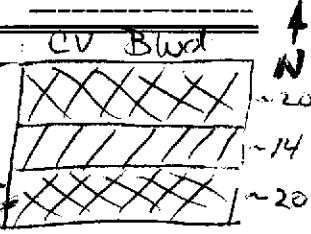
City Castro Valley Zip 94 Phone _____

II.B ACUTELY HAZ. MATLS

- ___ 10. Registration Form Filed 25533(a)
- ___ 11. Form Complete 25533(b)
- ___ 12. RMPP Contents 25534(c)
- ___ 13. Implement Sch. Req'd? (Y/N)
- ___ 14. OffSite Conseq. Assess. 25524(c)
- ___ 15. Probable Risk Assessment 25534(d)
- ___ 16. Persons Responsible 25534(g)
- ___ 17. Certification 25534(i)
- ___ 18. Exemption Request? (Y/N) 25536(b)
- ___ 19. Trade Secret Requested? 25538

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

- Inspection Categories:
- ___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
 - ___ II. Business Plans, Acute Hazardous Materials
 - III. Underground Tanks



* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

III. UNDERGROUND TANKS (Title 23)

- | | |
|-------------------------------|---|
| General | ___ 1. Permit Application 25284 (H&S) |
| | ___ 2. Pipeline Leak Detection 25292 (H&S) |
| | ___ 3. Records Maintenance 2712 |
| | ___ 4. Release Report 2651 |
| | ___ 5. Closure Plans 2670 |
| Monitoring for Existing Tanks | ___ 6. Method |
| | 1) Monthly Test |
| | 2) Daily Vadose
Semi-annual groundwater
One time soils |
| | 3) Daily Vadose
One time soils
Annual tank test |
| | 4) Monthly Gndwater
One time soils |
| | 5) Daily Inventory
Annual tank testing
Cont pipe leak det
Vadose/gndwater mon. |
| | 6) Daily Inventory
Annual tank testing
Cont pipe leak det |
| | 7) Weekly Tank Gauge
Annual tank testing |
| | 8) Annual Tank Testing
Daily inventory |
| | 9) Other _____ |
| New Tanks | ___ 7. Precs Tank Test 2643 |
| | Date: _____ |
| | ___ 8. Inventory Rec. 2644 |
| | ___ 9. Soil Testing 2646 |
| ___ 10. Ground Water. 2647 | |
| ___ 11. Monitor Plan 2632 | |
| ___ 12. Access. Secure 2634 | |
| ___ 13. Plans Submit 2711 | |
| Date: _____ | |
| ___ 14. As Built 2635 | |
| Date: _____ | |

Comments:
 on-site witness sampling of pit following vertical overexcavation. Due to tight constraints on-site because of soil stockpile locations, the vertical overexcavation was limited to the south and north 1/3 of the pit, to a depth of approx. 20' BG. GW was actively filling the southern end of the pit, primarily from water flowing from the new UST pit. ~~...~~
~~...~~
 This pit is approx. 13-14' BG. It was this observation that lead to the collection of sidewall samples from the 13-14' depth where possible. Hence, sidewall samples (two ea.) were collected from both the north and south walls; one sample was collected from the SE section of the east wall; and, a sixth sample was collected from the pit bottom at the north end. ~~...~~
~~...~~
 S.F.P. The pit will then be backfilled with pea gravel to approx. 8' BG, followed by compacted soil.

Rev 8/88

Contact: Ted Simes
 Title: owner
 Signature: Ted Simes

Inspector: S. Simes
 Signature: [Signature]

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Division Inspection Form

Site ID# _____ Site Name Xtra Oil Today's Date 7/16/92
Site Address 3495 Castro Valley Blvd EPA ID# _____
City Castro Valley Zip 94546 Phone _____

MAX Amt. Stored > 500lbs/55g/200cf? **Y N**
Hazardous Waste generated per month? _____

Inspection Categories:

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

IA GENERATOR (Title 22)

- ___ 1. Waste ID * 66471
- ___ 2. EPA ID 66472
- ___ 3. > 90 days 66508
- ___ 4. Label dates 66508
- ___ 5. Biennial 66493
- Manifest ___ 6. Records 66492
- ___ 7. Correct 66484
- ___ 8. Copy sent 66492
- ___ 9. Exception 66484
- ___ 10. Copies Rec'd 66492
- Misc. ___ 11. Treatment 66371
- ___ 12. On-site Disp. (H.S.&C.) 26189.5
- ___ 13. Ex Haz. Waste 66570
- Prevention ___ 14. Communications 67121
- ___ 15. Aisle Space 67124
- ___ 16. Local Authority 67126
- ___ 17. Maintenance 67120
- ___ 18. Training 67105
- Contn. gency ___ 19. Prepared 67140
- ___ 20. Name List 67141
- ___ 21. Copies 67141
- ___ 22. Emg. Coord. Trng. 67144
- Containers, Tanks ___ 23. Condition 67241
- ___ 24. Compatibility 67242
- ___ 25. Maintenance 67243
- ___ 26. Inspection 67244
- ___ 27. Buffer Zone 67246
- ___ 28. Tank Inspection 67259
- ___ 29. Containment 67245
- ___ 30. Safe Storage 67261
- ___ 31. Freeboard 67257

Comments:

On-site to witness closure of four (4) USTs. This is an active LOP site. Larry Brown (CUDF), Kip Prah (Kip Prah Assoc.) and Mike Collier (Walton) were on-site, among others, including Ted and Keith Simas of Xtra Oil.

① ~~_____~~ (super unleaded ^{regular} ~~out~~) appeared in excellent condition. Upon removal, strong gasoline odors were evident in pit; floating product was observed on GW welling into pit.

② ~~_____~~ (diesel) appeared in a similar cond. to the first UST.

③ ~~_____~~ (unleaded) ^{87 oct} appeared in good condition overall, although an area of pitting was noted ~~at~~ on the west end cap of this tank.

④ ~~_____~~ (super unleaded) ^{92 oct} appeared in excellent condition, as with tanks 1 & 2. A large hole was ripped into its bottom during excavation, however, requiring that it be plugged with 4x4 wooden wedges.

All 4 USTs were hauled by Erickson

IB TRANSPORTER (Title 22)

- ___ 32. Applic./Insurance 66428
- ___ 33. Comp. Cert./CHP Insp. 66448
- ___ 34. Containers 66465
- Manifest ___ 35. Vehicles 66465
- ___ 36. EPA ID #s 66531
- ___ 37. Correct 66541
- ___ 38. HW Delivery 66543
- ___ 39. Records 66544
- Cont'l's ___ 40. Name/ Covers 66545
- ___ 41. Recyclables 66800

Contact: Ted Simas
Title: owner
Signature: Ted Simas

Inspector: S. Seery
Signature: [Signature]

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Division Inspection Form

Site ID# _____ Site Name Xtra Oil Today's Date 7/16/92

Site Address 3495 CV Blvd EPA ID# _____

City Castro Valley Zip 94546 Phone _____

MAX Amt. Stored > 500lbs/55g/200cf? Y N
Hazardous Waste generated per month? _____

Inspection Categories:

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

IA GENERATOR (Title 22)

- 1. Waste ID 66471
- 2. EPA ID 66472
- 3. > 90 days 66508
- 4. Label dates 66508
- 5. Biennial 66493

Manifest

- 6. Records 66492
- 7. Correct 66484
- 8. Copy sent 66492
- 9. Exception 66484
- 10. Copies Rec'd 66492

Misc.

- 11. Treatment 66371
- 12. On-site Disp. (H.S.&C.) 26189.5
- 13. Ex Haz. Waste 66570

Prevention

- 14. Communications 67121
- 15. Aisle Space 67124
- 16. Local Authority 67126
- 17. Maintenance 67120
- 18. Training 67105

Conf. gency

- 19. Prepared 67140
- 20. Name List 67141
- 21. Copies 67141
- 22. Emg. Coord. Trng. 67144

Containers, Tanks

- 23. Condition 67241
- 24. Compatibility 67242
- 25. Maintenance 67243
- 26. Inspection 67244
- 27. Buffer Zone 67246
- 28. Tank Inspection 67259
- 29. Containment 67245
- 30. Safe Storage 67261
- 31. Freeboard 67257

IB TRANSPORTER (Title 22)

- 32. Applic./Insurance 66428
- 33. Comp. Cert./CHP Insp. 66448
- 34. Containers 66465

Manifest

- 35. Vehicles 66465
- 36. EPA ID #s 66531
- 37. Correct 66541
- 38. HW Delivery 66543
- 39. Records 66544

Conf'r's

- 40. Name/ Covers 66545
- 41. Recyclables 66800

Comments:

The UST pit was cleaned out to facilitate

Sampling. [REDACTED]

[REDACTED] observed, as [REDACTED]

Although GW was observed seeping into the pit during closure, samples from below the south tank were collected from a tan, dry, native silt. HC colors were evident. [REDACTED]

The subsequent samples collected from ea. of the additional tanks were collected from the same apparent horizon and native soil type.* Soil became moister towards the NW, though its lithology appeared consistent. Sample at NW corner (west end of north tank - SUL) was collected @ a bit shallower depth, from a sandier silt, mottled, and near saturation. GW began seeping in to the excavated bucket holes left behind in the pit after sampling. A decision was reached, based on the apparent soil contamination of the initially sampled horizon, to return tomorrow (7-17-92) to over excavate vertically along the eastern 1/2 of the pit, to the limits of the excavator.

Rev 6/88

Contact: Ted Simes

Title: owner

Signature: Ted Simes

Inspector: S. Sedry

Signature: [Signature]

* Note: A sample (initial) from below the east end of tank #3 was not collected today.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

June 4, 1992

Mr. Ted Simas
XTRA Oil Company
2307 Pacific Avenue
Alameda, CA 94501

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

RE: XTRA OIL STATION DBA SHELL, 3495 CASTRO VALLEY BOULEVARD

Dear Mr. Simas:

As discussed during our meeting May 29th, the May 19, 1992 K & B Environmental site remediation work plan is acceptable in principle to this Department. This plan briefly describes plans to remediate the subject site in three phases:

- o Phase I - overexcavate the current and new underground storage tank (UST) pits during tank replacement activities; remove free floating product using a vacuum truck or other comparable means; install a french drain system and ground water extraction well in the current UST pit following overexcavation; and, install an ex-situ ground water/soil treatment system
- o Phase II - install soil vapor extraction probes; and, plumb and manifold soil vapor and ground water extraction systems
- o Phase III - continued ground water monitoring

Although the submitted plan is acceptable in principle, the range of remediation alternatives discussed are presented in general terms, with implementation of certain of the remediation measures retained on a tentative basis. Site-specific information is still needed: ground water and soil vapor extraction system engineering drawings, equipment cut sheets, operational flow diagrams, air and sewer agency discharge permit and treatment standards, and remediation timelines, among other elements.

As we further discussed, the lateral extent of ground water and soil contamination extending from the site still has not been defined. Hence, the magnitude of the problem is unknown. This must be determined through the installation of additional monitoring wells. Further, the effectiveness of the any remediation system cannot be gauged without such wells.

Lastly, as discussed, shallow soil excavated in the area of the new tank pit is assumed to be "clean" to a depth of 5-feet below grade (BG); soil removed from depths greater than 5-feet BG must be appropriately tested to determine the presence of target compounds. Sampling frequency is dictated by planned use of excavated soil (i.e., disposal vs. reuse on site).

Mr. Ted Simas
RE: 3495 Castro valley Blvd.
June 4, 1992
Page 2 of 2

Please call me at 510/271-4320 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Gil Jensen, Alameda County District Attorney's Office
Richard Hiatt, RWQCB
Howard Hatayama, DTSC
Bob Bohman, Castro Valley Fire Department
Kip Porter, K & B Environmental

ALAMEDA COUNTY HEALTH CARE SERVICE AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 HAZARDOUS MATERIALS DIVISION
 80 SWAN WAY, ROOM 200
 OAKLAND, CA 94621
 PHONE NO. 510/271-4320

SCOTT SERRY

6-3-92
 6408
 ACCEPTED

DEPARTMENT OF ENVIRONMENTAL HEALTH
 470 - 27th Street Third Floor
 Oakland, CA 94612
 Telephone: (415) 876-7237

These plans have been reviewed and found to be acceptable and comply with the requirements of State and local health laws. Closure of these areas indicated by this Department are in compliance with State and local laws. The plans submitted are subject to approval on issuance of a permit for the job or transaction.

On removal of the tank, you shall be responsible and liable for all collection and maintenance involved with the removal.

Any time an inspection is done of these tanks, the owner shall be responsible for the job and the tank. The owner shall be responsible for the job and the tank. The owner shall be responsible for the job and the tank.

These tanks shall be closed within 48 hours after the date of the permit.

2-16-92
 2-16-92
 2-16-92
 2-16-92

Final Inspection
 Inspection of a permit is dependent on compliance with applicable State and local laws and regulations.

THIS INFORMATION IS NOT
 TO BE RELEASED TO THE PUBLIC

ANALYSIS FOR Pb (TOTAL)
 ADDED -

*** Complete according to attached instructions ***

UNDERGROUND TANK CLOSURE PLAN

- Business Name XTRA OIL COMPANY
 Business Owner EDWARD T + CAROL L. SIMAS, XTRA OIL CO.
- Site Address 3495 CASTRO VALLEY BLVD.
 city CASTRO VALLEY Zip CA Phone 415-537-7045
- Mailing Address 2307 PACIFIC AVE.
 city ALAMEDA CA Zip 94501 Phone 415-865-9503
- Land Owner EDWARD T. SIMAS, XTRA OIL CO.
 Address 2307 PACIFIC AVE city, state ALAMEDA, CA zip 94501
- Generator name under which tank will be manifested XTRA OIL COMPANY
 EPA I.D. No. under which tank will be manifested CAC00168736

6. Contractor WATSON ENGINEERING, INC.
Address 837 RISK IN W. SACRAMENTO CA 95691
City W. SACRAMENTO, CA 95691 Phone 916 373 1155
License Type* A/HAZ ID# 617238

*Effective January 1, 1992, Business and Professional Code Section 7058.7 requires prime contractors to also hold Hazardous Waste Certification issued by the State Contractors License Board. Indicate that the certificate has been received, in addition, to holding the appropriate contractors license type.

7. Consultant ROBERT H. LEE + ASSOC., INC.
Address 900 LACKSPUR LANDING Circle # 125
City LACKSPUR, CA 94939 Phone 415-486-1323

8. Contact Person for Investigation
Name TED SIMAS Title OWNER
Phone 415-865-9503

9. Number of tanks being closed under this plan 4
Length of piping being removed under this plan 548 FT.
Total number of tanks at facility 4

10. State Registered Hazardous Waste Transporters/Facilities (see instructions).

** Underground tanks are hazardous waste and must be handled **
as hazardous waste

a) Product/Residual Sludge/Rinsate Transporter
Name H+H EPA I.D. No. CAD004771168
Hauler License No. 0334 License Exp. Date 01-31-92
Address 220 CHINA BASIN
City SAN FRANCISCO State CA Zip 94124

b) Product/Residual Sludge/Rinsate Disposal Site
Name H+H EPA I.D. No. CAD004771168
Address 220 CHINA BASIN
City SAN FRANCISCO State CA Zip 94124

c) Tank and Pipe Transporter

Name H+H EPA I.D. No. CAD00471168
Hauler License No. 0334 License Exp. Date 01/31/92
Address 220 CHINA BASIN
City SAN FRANCISCO State CA Zip 94124

d) Tank and Piping Disposal Site

Name H+H EPA I.D. No. CAD00471168
Address 220 CHINA BASIN
City SAN FRANCISCO State CA Zip 94124

11. Experienced Sample Collector

Name Kevin Keeley
Company SEQUOIA ANALYTICAL
Address 680 Chesapeake Dr
City Redwood City State CA Zip 94063 Phone 415 364 9600

12. Laboratory

Name SEQUOIA ANALYTICAL
Address 680 Chesapeake Dr
City Redwood City State CA Zip 94063
State Certification No. 145

13. Have tanks or pipes leaked in the past? Yes [] No []

If yes, describe. ON-GOING GROUNDWATER INVESTIGATION

14. Describe methods to be used for rendering tank inert

Minimum 15 LBS CO₂ in the form of Dry Ice For each 1000 gallons of Tank Capacity will be Placed in each Tank, or per local Fire Department Requirements.

Before tanks are pumped out and inerted, all associated piping must be flushed out into the tanks. All accessible associated piping must then be removed. Inaccessible piping must be plugged.

The Bay Area Air Quality Management District (771-6000), along with local Fire and Building Departments, must also be contacted for tank removal permits. Fire departments typically require the use of explosion proof combustible gas meters to verify tank inertness. It is the contractor's responsibility to bring a working combustible gas meter on site to verify tank inertness.

15. Tank History and Sampling Information

Tank		Material to be sampled (tank contents, soil, ground-water, etc.)	Location and Depth of Samples
Capacity	Use History (see instructions)		
19,000	Regular unleaded Gasoline	SOIL/WATER (if applicable)	2 CONFIRMATORY SAMPLES WILL BE TAKEN BENEATH EA. TANK, TWO FEET BELOW NATIVE SOIL BACKFILL INTERFACE. ONE SAMPLE AT EACH END OF TANK. SIDEWALK SAMPLES WILL BE TAKEN IF GROUNDWATER IS FOUND IN UST HOLE. *
19,000	Super unlead Gasoline		
19,000	Regular LEADED Gasoline		
19,000	Diesel		

* One soil sample must be collected for every 20 feet of piping that is removed. A ground water sample must be collected should any ground water be present in the excavation.

Excavated/Stockpiled So

<p>Stockpiled Soil Volume (Estimated)</p>	<p>Sampling Plan The excavated soils will be placed on plastic and stored on-site. One composite sample, consisting of four individual brass sampling cylinders, will be analyzed for every 50 cubic yards of soil. Each sample will be sampled at the laboratory and analyzed for TPH as gasoline, and BTXE. Should detectable amounts of petroleum hydrocarbons be found, the samples will then be analyzed for lead. The analytical results will then be forwarded to Class II and/or Class III landfills for disposal approval.</p>
---	---

Stockpiled soil must be placed on bermed plastic and must be completely covered by plastic sheeting.

16. Chemical methods and associated detection limits to be used for analyzing samples

The Tri-Regional Board recommended minimum verification analyses and practical quantitation reporting limits should be followed. See attached Table 2.

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit
TOTAL PETROLEUM HYDROCARBONS ANALYSIS	SOIL - 3550 WATER - 3510	EPA 5030 TPH-G TPH-D LUFT/DHS method	1.0 ppm 1.0
BENZENE TOUENE, XYLENE ETHYLBEZENE	} EPA 8020 OR 602	FOLLOWED BY 8240 (SOIL) OR 624 (WATER)	0.005
Total Lead		AA or ICP	

17. Submit Site Health and Safety Plan (See Instructions)

18. Submit Worker's Compensation Certificate copy

Name of Insurer UNICAF

19. Submit Plot Plan (See Instructions)

20. Enclose Deposit (See Instructions)

21. Report any leaks or contamination to this office within 5 days of discovery. The report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report form. (see Instructions)

22. Submit a closure report to this office within 60 days of the tank removal. This report must contain all the information listed in item 22 of the instructions.

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true.

I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel health and safety. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

Once I have received my stamped, accepted closure plan, I will contact the project Hazardous Materials Specialist at least three working days in advance of site work to schedule the required inspections.

Signature of Contractor

Name (please type) RANDY ROGERS

Signature [Handwritten Signature]

Date 06-02-92

Signature of Site Owner or Operator

Name (please type) _____

Signature _____

Date _____

ACORD. CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY)

12-17-91

PRODUCER

R.L. MILSNER, INC.
2125 OAK GROVE ROAD STE 110
WALNUT CREEK, CA 94598

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

COMPANIES AFFORDING COVERAGE

COMPANY LETTER **A** UNICARE INSURANCE COMPANY

COMPANY LETTER **B**

COMPANY LETTER **C**

COMPANY LETTER **D**

COMPANY LETTER **E**

INSURED

WALTON ENGINEERING
837 RISKE LANE
WEST SACRAMENTO, CA 95691

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
	GENERAL LIABILITY COMMERCIAL GENERAL LIABILITY CLAIMS MADE <input type="checkbox"/> OCCUR. OWNER'S & CONTRACTOR'S PROT.				GENERAL AGGREGATE \$ PRODUCTS-COMP/OP AGG. \$ PERSONAL & ADV. INJURY \$ EACH OCCURRENCE \$ FIRE DAMAGE (Any one fire) \$ MED. EXPENSE (Any one person) \$
	AUTOMOBILE LIABILITY ANY AUTO ALL OWNED AUTOS SCHEDULED AUTOS HIRED AUTOS NON-OWNED AUTOS GARAGE LIABILITY				COMBINED SINGLE LIMIT \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE \$
	EXCESS LIABILITY UMBRELLA FORM OTHER THAN UMBRELLA FORM				EACH OCCURRENCE \$ AGGREGATE \$
A	WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY	UCA026069	12-31-91	12-31-92	STATUTORY LIMITS EACH ACCIDENT \$ 1,000,000 DISEASE-POLICY LIMIT \$ 1,000,000 DISEASE-EACH EMPLOYEE \$ 1,000,000
	OTHER				

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

CERTIFICATE HOLDER

COUNTY OF ALAMEDA
4400 MAC ARTHUR BLVD.
OAKLAND, CA 94619

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ~~SEND~~ MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT. ~~BY MAILING THIS NOTICE TO THE ADDRESS OF THE CERTIFICATE HOLDER, THE COMPANY IS AGREEING TO SEND SUCH NOTICE TO THE ADDRESS OF THE CERTIFICATE HOLDER.~~

AUTHORIZED REPRESENTATIVE

Allen P. Potts

XTRA OIL COMPANY
2307 PACIFIC AVE.
ALAMEDA, CA 94501
(510) 865-9503

March 2, 1992

Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Attention: Eric D. Stevenson
Air Quality Engineer

Regarding: Letter dated 2/24/92
3495 Castro Valley Blvd.
Remodeling Project

Dear Mr. Stevenson:

Your letter of February 24, requesting a throughput limit of 1.7 MM gal/yr, shocked and bewildered me. In our previous phone conversations in November and again in January regarding the application for the Castro Valley remodel, there was never any mention of any throughput limitations. After receiving you February 24 letter, I called other independent marketers and called California Oil Jobbers' Association, and found that they were also unaware of the throughput limitations. Then I called a major oil company engineer and found that he had been forewarned of the limitation on throughput and was able to complete his projects before its implementation.

Had you made me aware of your throughput limit on our January phone conversation when we were discussing the fees, I probably would not have sent you the \$1,500 charge.

The \$1,500 is only the tip of the ice-berg as we have already spent a great deal of money on the Castro Valley project and the 1701 Park Street, Alameda project i.e., Health Department fees, Architecture fees, Building Department fees, Engineering fees and acquisition of equipment.

Xtra Oil is a small family owned and operated independent retail marketer of 9 service stations. We have been in the retail business over 32 years. We do not have millions of stockholders like the majors. We have just two stockholders who have spent 32 years investing in these locations. Independents have to merchandise at a lower price and maintain high volume in order to survive and compete against the majors. Major oil companies are able to pass off their environmental costs to the consumers via the wholesale price. As an

independent retailer we can not pass our environmental costs on to the consumer.

The 1.7 MM gal/yr limitation with our present margins of 7c per gallon would generate \$10,000 per month gross. This does not pay for our overhead. Our overhead alone without factoring in property costs environmental fees, professional fees, etc. run at \$11,000 per month. It is apparent that by applying your throughput of 1.7 MM gal/yr, we could not stay in business, not to mention the cost risks of environmental clean up.

Presently our volumes are at 3.0 MM gal/yr. If we were to raise our prices in order to meet your 1.7 MM gal/yr we would suffer a drastic loss in volume and still not make our overhead. How are we to economically justify the cost of cleaning up our sites to meet the EPA 1998 standards, based on the aforementioned? We have use permits for our Gas Stations but the use permits appear worthless if you apply your volume limitations.

As a small business property owner who's family has invested 32 years and their life savings in the business, we believe that your proposed volume limitation is contrary to the American way. I hope you would reconsider your limitation amounts. We will require 5 MM gal/yr to justify future expenditures. If possible we would like to meet with you personally to resolve this issue or if that is not possible, please refer me to some higher Board in order that Xtra Oil may avoid economic disaster.

Very truly yours,



Ted Simas
President



BAY AREA AIR QUALITY MANAGEMENT DISTRICT

ALAMEDA COUNTY
Edward R. Campbell
Loni Hancock
Greg Harper
Frank H. Ogawa

CONTRA COSTA COUNTY
Paul L. Cooper
(Chairperson)
Sunne Wright McPeak
Tom Powers

MARIN COUNTY
Al Aramburu

NAPA COUNTY
Paul Battisti

SAN FRANCISCO COUNTY
Roberta Achtenberg
Harry G. Britt

SAN MATEO COUNTY
Gus J. Nicolopoulos
Anna Eshoo
(Vice Chairperson)

SANTA CLARA COUNTY
Martha Clevenger
Rod Diridon
Joe Head
Dianne McKenna

SOLANO COUNTY
Osby Davis

SONOMA COUNTY
Jim Harberson
Patricia Hilligoss
(Secretary)

February 24, 1992

Edward Simas
Xtra Oil Company
2307 Pacific Ave.
Alameda, CA 94501

BAAQMD GDF Number: 325
Application Number: 22706
Equipment Location:
Xtra Oil Company
3495 Castro Valley Blvd.
Castro Valley 94546

Gentlemen:

Due to a review of Toxics policy at the District, gasoline dispensing facilities (GDF's) with an annual gasoline throughput of greater than 1.7 million gallons will be subject to new requirements. The purpose is to reduce health hazards due to benzene emissions.

Properly operating balance systems have an 95% collection efficiency for gasoline vapors. When gasoline throughput is more than 1.7 MM gallons/yr, and the GDF has a balance system, the added risk of excess cancer cases due to benzene may be at an unacceptable level.

The following two options are open to you:

- You may accept a throughput limit of 1.7 MM gal/yr
- You may submit a Toxic Risk Assessment form

If you submit the Toxic Risk Assessment form, the assessment will be completed in one to two weeks. If the assessment determines that the risk is negligible, you may complete your project with the installation of a balance system. If the risk is significant, the District will require throughput limitations and/or other methods to decrease the risk to acceptable levels.

Should you have any questions regarding your options or the form, please contact Eric Stevenson in the Permit Services Division at (415) 749-4695. Your quick response is greatly appreciated. Please note that your application will be considered incomplete until this issue is resolved.

Sincerely,

Eric D. Stevenson
Air Quality Engineer

Enclosure

DATE: 2/11/92
TO : Local Oversight Program
FROM: Scott
SUBJ: Transfer of Eligible Oversight Case

Site name: Xtra Oil dba Shell Station

Address: 3495 Castro Valley Blvd City Castro Valley Zip 94546

* Closure plan attached? Y N DepRef remaining \$ 3.00

DepRef Project # _____ STID #(if any) 3747

Number of Tanks: 5 removed? Y N Date of removal 11/88 one tank removed

Leak Report filed? Y N Date of Discovery 11/7/88 4 others pending

Samples received? Y N Contamination: soil and GW

Petroleum Y N Types: Avgas Jet leaded unleaded Diesel
fuel oil waste oil kerosene solvents

Monitoring wells on site 3 Monitoring schedule? Y N

LUFT category 1 2 3 * H S C A R W G 0

Briefly describe the following:

Preliminary Assessment Completed

Remedial Action pending

Post Remedial Action Monitoring NA

Enforcement Action NA

There ~~are~~ ^{were} five (5) USTs on this site. One (1) waste oil tank was removed* during Nov 1988 sans permit. Subsequent soil samples confirmed a release. Three (3) GW monitoring wells installed 2/15/90. Severe GW contamination has been tracked for the last two years, w/ both diesel and gasoline components. TPH-G has been as high as 230ppm; benzene as high as 82,000 ppb! The remaining UST are slated for removal this quarter. Extended over. excavation is slated to occur to remove as much contaminated soil as possible. GW extraction/treatment, as well as off-site assessment, planned in near future. Sampling frequency has just been reduced from monthly to quarterly.

§ 66680
(p. 1800.18)

ENVIRONMENTAL HEALTH

TITLE 21

(Register 64, No. 61-10-12-84)

- 729. *Thiocarbonylchloride, Thiophosgene (T,C,R)
- 730. *Thionazin, ZINOPHOS; O,O-Tetramethyliduram monosulfide (T)
- 731. *Thionyl chloride, Sulfur oxychloride (T,C,R)
- 732. *Thiophosphoryl chloride (T,C,R)
- 733. Thorium (powder) (F)
- 734. Tin compounds (organic) (T)
- 735. Tlantium (powder) (F)
- 736. Titanium sulfate (T)
- 737. *Titanium tetrachloride, Titanic chloride (T,C,R)
- 738. Toluene, Methylbenzene (T,F)
- 739. *Toluene-2,4-dithiocyanate, TDI (T,R)
- 740A. Toluidine, Aminotoluene (ortho,meta,para) (T)
- 740B. *Toxaphene, Polychlorocamphene (T)
- 741. *TRANID, cis-3-Chloro-endo-6-cyano-2-norbornanone-O-(methylcarbamoyl) oxime (T)
- 742. 1,1,2-Trichloroethane (T)
- 743. Trichloroethylene; Trichloroethene (T)
- 744. Trichloroisocyanuric acid (T,I,F)
- 745. *2,4,5-Trichlorophenoxyacetic acid; 2,4,5-T (T)
- 746. Trichloroethane, Silicochloroform (T,C,F,R)
- 747. Trimethylamine, TMA (T,F)
- 748. Trinitroanisole; 2,4,6-Trinitrophenyl methyl ether (T,R)
- 749. 1,3,5-Trinitrobenzene, TNB (T,R)
- 750. 2,4,6-Trinitrobenzoic acid (T,R)
- 751. Trinitrophenol, TNT (T,F,R)
- 752. Trinitroresorcinol, Styptic acid (T,R)
- 753. 2,4,6-Trinitroresorcinol, Styptic acid (T,R)
- 754. 2,4,6-Trinitrotoluene, TNT (T,F,R)
- 755. *tris(1-Azididanyl) phosphine oxide, Triethylenephosphoramide, TEPA (T)
- 756. Tungstic acid and salts (T)
- 757. Turpentine (T,F)
- 758. Uranyl nitrate, Uranium nitrate (T,F,R)
- 759. Urea nitrate (T,F,R)
- 760. n-Valeraldehyde, n-Pentanal (and isomers) (T,F)
- 761. Vanadic acid salts (T)
- 762. Vanadium oxytrichloride (T,C)
- 763. *Vanadium pentoxide, Vanadic acid anhydride (T)
- 764. Vanadium tetrachloride (T,C)
- 765. Vanadium tetroxide (T)
- 766. Vanadium trioxide, Vanadium sesquioxide (T)
- 767. Vanadyl sulfate, Vanadium sulfate (T)
- 768. Vinyl acetate (F,T)
- 769. Vinyl chloride (T,F)
- 770. Vinyl ethyl ether (F)
- 771. Vinylidene chloride, VC (T,F)
- 772. Vinyl isopropyl ether (F)
- 773. *Vinyltrichlorosilane (T,C,F,R)
- 774. VX, O-Ethyl methyl phosphoryl N,N-diisopropyl thiocholine (T)
- 775. *WEPSYN 155, WP 155, Triamphos, para-(6-Amino-3-phenyl-1H-1,2,4-triazol-1-yl)-N,N,N',N'-tetramethyl phosphonic diamide (T)

TITLE 22

ENVIRONMENTAL HEALTH

(Register 64, No. 61-10-12-84)

- 776. Xylene, Dimethylbenzene (ortho,meta,para) (T,F)
- 777. Zinc (powder) (F)
- 778. Zinc ammonium nitrate (T,F)
- 779. *Zinc arsenate (T)
- 780. *Zinc arsenite (T)
- 781. Zinc chloride (T,C)
- 782. Zinc compounds (T)
- 783. *Zinc cyanide (T)
- 784. Zinc nitrate (T,F,R)
- 785. Zinc permanganate (T,F)
- 786. Zinc peroxide, Zinc dioxide (T,F,R)
- 787. *Zinc phosphide (T,F,R)
- 788. Zinc sulfate (T)
- 789. Zirconium (powder) (F)
- 790. *Zirconium chloride, Zirconium tetrachloride (T,C,R)
- 791. *Zirconium picramate (F)

§ 66680
(p. 1800.19)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

January 21, 1992

DEPARTMENT OF ENVIRONMENTAL HEALTH
80 Swan Way, Rm. 210
Oakland, CA 94621
(415) 271-4300

Mr. Ted Simas
XTRA Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: GROUND WATER MONITORING FREQUENCY; 3495 CASTRO VALLEY BOULEVARD

Dear Mr. Simas:

Your present ground water monitoring schedule has been reevaluated as a result of the pending underground storage tank (UST) replacement project, and following conversations with Mr. Kip Porter of K & B Environmental. ~~Mr. Porter described plans to overexcavate the site during UST closure to remove, to the extent possible, petroleum contaminated soils.~~ Our impression is that the removal of severely contaminated soil from the site will remove a future ground water contamination source area.

At this time, please continue to monitor and sample the ground water monitoring wells, and submit summary reports, on a **quarterly** basis.

Please call me at 510/271-4320 should you have any questions.

Sincerely,


Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Howard Hatayama, DTSC
Bob Bohman, Castro Valley Fire Department
Kip Porter, K & B Environmental

October 15, 1991

Alameda County Health Care Services
Department of Environmental Health
80 Swan Way, Room 200
Oakland, Ca 94621

Attention: Scott Seery

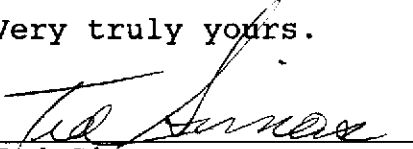
Regarding: UST Closure Application, 3495 Castro Valley Boulevard

Dear Mr. Seery,

Please find enclosed the 2 items requested in your letter of 9/13/91 for your review on the above closure application:

1. Site safety plan.
2. Copy of Worker's Compensation Certificate for the contractor.

Very truly yours.


Ted Simas

Enclosures

cc: Kip Porter, K & B Environmental
Stokley Construction



September 13, 1991

Mr. Ted Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

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

RE: UST CLOSURE APPLICATION, 3495 CASTRO VALLEY BOULEVARD

Dear Mr Simas:

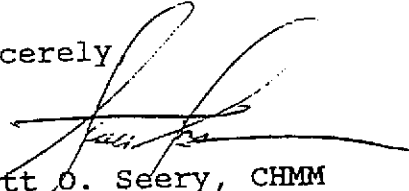
This Department has completed review of the underground storage tank (UST) closure application which addresses the closure of four (4) fuel USTs at the referenced site. Two items require your attention, including the submittal of additional information, as indicated below:

- 1) Submit a Site Safety Plan which adheres to the requirements outlined pursuant to 29CFR 1910.120. Please reference the attached excerpts from the cited section of 29CFR.
- 2) Submit a site-specific copy of the Worker's Compensation Certificate issued by the contractor's insurer for the project at this site.

Please submit the requested information in a timely fashion. Once this additional information has been reviewed and the closure plan approved, the UST closure may be scheduled with this office.

Please call me at 510/271-4320 should you have any questions.

Sincerely


Scott O. Seery, CHMM
Hazardous Materials Specialist

attachment

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Howard Hatayama, DTSC
Bob Bohman, Castro Valley Fire Department
Tex Stockley, Stockley Construction
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



April 19, 1991

Mr. John Cussen
California Geophysical Group, Inc.
12709 Poway Road, Suite 202
Poway, CA 92064

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

RE: XTRA OIL DBA SHELL STATION, 3495 CASTRO VALLEY BLVD., CASTRO
VALLEY, ALAMEDA COUNTY

Dear Mr. Cussen:

Thank you for your recent submittals of the supplemental work plan and fourth quarter report dated January 18 and February 13, 1991, respectively. This Department has completed review of the referenced submittals, and has reached concurrence with the San Francisco Bay Regional Water Quality Control Board (RWQCB) regarding the issues to be presented below:

- 1) The RWQCB requires that all reports and proposals be submitted under signature and seal of an appropriate registered professional in the State of California. This standing is based upon the language of the Geologist and Geophysicist Act and Professional Engineers Act, as codified in the Business and Professions Code (Code). The appropriate professional registrations for the submittal of such reports or proposals are: geologist (RG), specialty geologist (e.g., certified engineering geologist [CEG]), or civil engineer (RCE). The February 13 submittal is under the signature of Gilein Steensma, Calif. Registered Geophysicist No. 946, and yourself, REA No. 01979.

The Code limits or expands the type of work each of the registered professionals may oversee: RCEs may submit engineering reports which include materials of a geologic nature; conversely, a RG or CEG is not empowered to submit engineering reports or plans. Section 7839.1 of the Code further restricts the practice of geophysics or geology such that "...[t]his chapter shall not empower a geophysicist registered under this chapter to practice or offer for practice geology for others in this state except as such geological work is related to his practice of geophysics."

Hence, a registered geophysicist (GP) may oversee work or submit reports involving the use of geophysical techniques to aid others during the course of an environmental investigation (e.g., to locate potential well sites by mapping subsurface anomalies using geophysical techniques). However, a GP is not appropriate for the submittal of reports or proposals dealing with the actual installation of wells, sampling of these wells, and the interpretation of data gathered from their subsequent monitoring or sampling.

Mr. John Cussen
RE: XTRA Oil dba Shell Station, 3495 Castro Valley Blvd.
April 19, 1991
Page 2 of 4

Further, during discussions with Mr. Lester Feldman of the RWQCB, Mr. Feldman indicated that the RWQCB is also not currently recognizing REAs as an appropriate professional certification for site investigations of this nature in this region. This does not mean, however, that this stance will not change in the future. Presently, Mr. Feldman indicated that the RWQCB is willing to relax these standards on a case-by-case basis should sufficient evidence be provided documenting the history and nature of a firm's, as well as each key individuals', experience with conducting soil and ground water investigations in California. We respectfully request that you submit a statement of qualifications for consideration by this Department and RWQCB;

- 2) Ground water gradient maps are to be included for each month of gradient calculations. Please submit copies of such maps for those months covered in the latest sampling report (November, December, January);
- 3) Each sampling report must include copies of the chain-of-custody forms used to document sample handling. Please submit copies of these forms for all sampling episodes covered in the last two (2) sampling reports;
- 4) In future reports, please tabulate all previous and current sampling results to ease the comparative review of data;
- 5) Please be advised that monthly ground water sampling was to continue **monthly** until otherwise advised. This fact was stated in correspondence from this office dated December 27, 1990, and was based upon the continued wide fluctuations of contaminant concentrations noted in well MW-3. The February 13, 1991 report illustrates the continuation of this trend in MW-3. It is unfortunate that samples were collected only during January during this report period. **Sampling shall remain on a monthly schedule until advised otherwise.**
- 6) The January 18, 1991 geophysical work plan indicates a vicinity map showing the area in which the geophysical survey is to be conducted was attached. No such map was attached. **Please submit this map.**

A review of past sampling data indicates that TPH as diesel was not detected in water samples first collected from the wells at this site during February 1990; only TPH as gasoline and BTEX were detected. As a result, future analysis for TPH-D was not indicated at that time.

Mr. John Cussen
RE: XTRA Oil dba Shell Station, 3495 Castro Valley Blvd.
April 19, 1991
Page 3 of 4

However, the Sequoia Analytical laboratory report sheets documenting the analyses of samples collected during July 1990 indicate that TPH as diesel was not only analyzed for, but also detected. It appears that no TPH-G analyses were run for this sampling event. Subsequent analyses have not included TPH-D analyses, but, rather, only TPH-G and BTEX. Future sampling shall also include analyses for TPH-D.

The February 13, 1991 report contends that the elevated levels of contaminants discovered in well MW-3 may be a result of the release of diesel product reported during October 1990. Diesel fuel, at best, contains negligible concentrations of the volatile compounds BTEX, or gasoline. Of gasoline's many constituents, BTEX are some of the most volatile. Certainly the lower (boiling) end of the diesel range may appear on a gasoline analysis GC chromatogram, for the boiling point of gasoline ranges from 30-200°C, and that of diesel, 175-375°C.

With these facts in mind, one should not expect a release of diesel to manifest as an increase in BTEX or TPH-G concentration per se, presuming that such release is intercepted by a monitoring well and sampled. The history of sampling results for the last year at this site indicates that the fluctuations noted recently have been occurring on a "regular", periodic basis. Hence, we do not agree that the increases in contaminant concentrations discovered in January are as a direct result of the October 1990 diesel release.

We do agree, however, that there may likely be a conduit(s) contributing to the occurrence of contaminants in ground water being intercepted by wells at this site. This avenue of contaminant distribution (e.g., migration through utility trenches, vent piping trenches, etc.) certainly warrants additional investigation, and may likely explain the periodic increases noted in MW-3 and the overall occurrences of ground water contamination about the site.


The Department, as well as the RWQCB, is adamant that additional work proceed, but in a fashion consistent with the laws, regulations, and policy controlling such work. We agree that the geophysical techniques proposed may significantly increase the chances of siting well-located monitoring wells. However, we must reiterate that adherence to the requirement for appropriate professional qualifications be maintained. Should these appropriate qualifications prove difficult to substantiate, you may want to consider subcontracting with an independent RG/CEG/RCE for the submittal of well installation proposals and oversight of the environmental aspects of future work at the site.

Mr. John Cussen
RE: XTRA Oil dba Shell Station, 3495 Castro Valley Blvd.
April 19, 1991
Page 4 of 4

Please submit the additional information requested in this letter in a timely fashion. Once this information has been reviewed and concurrence reached with the RWQCB, we will contact you and the property owner to advise of our determinations.

Please feel free to contact me at 415/271-4320 to discuss the issues raised in this letter.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Howard Hatayama, DHS
John Fenstermacher, Chief, Real Estate Division
James Chu, Alameda County Public Works Agency
Bob Bohman, Castro Valley Fire Department
Ted Simas, XTRA Oil
files

Xtra Oil Meeting

1-17-91

Nov. 1988

330 w.o. tank removed

1989-90

USTs tested "tight"

Feb 1990

3-wells installed

Data from the sampling events suggest on off site source.

Need to assess the extent of soil / G.W. contamination
- would like to perform a geophysical survey to aid in placement of wells
- soil borings may or may not be ~~used~~ performed in conjunc w/ ~~it~~

Feels contamination soils

CV Creek Restoration project
Scott Wiley - AlCo BW.

John Fenstermacher - AICo RE.

Property acquisition

- at least a year before road project will begin
- County requires that the property they acquire be cleaned up
- pay fair market value of ground (now?)

Fed Highway requirements

relocation costs covered?

Severance damages covered?

Possibility of compromising the Fed/State funds with road project

Xtra Oil Company

1-17-91

Scott Seery
John Fenstermaker
Stanley Fung
Art Carrera
Carol Sumas
Kurt Jinas
Peter SAWRAT-KUBICKI
John Cussen
Ted Sumas
JAY SCHNACK

AlCo Env. Health
Ala Co. Public Works
Ala. Co. Public Works
" " " "
XTRA OIL CO.
" "
Alameda County Planning
California Geophysical
Xtra Oil Co
Xtra Oil ATTY

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

December 27, 1990

Mr. Ted Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: XTRA OIL COMPANY DBA SHELL OIL STATION, 3495 CASTRO VALLEY
BOULEVARD, CASTRO VALLEY, ALAMEDA COUNTY

Dear Mr. Simas:

Thank you for your recent submittal of the November 6, 1990 California Geophysical Group, Inc. report documenting sampling activities at the referenced site during July, August, and September 1990, as submitted under Xtra Oil Company cover dated November 20, 1990. This most recent report has been reviewed in context with data presented previously in the March 28, 1990 Western Geo-Engineers report.

As we discussed by phone yesterday, concentrations of dissolved phase fuel components fluctuated significantly during this (3rd) quarter. For example, fluctuations of as much as three orders-of-magnitude were observed for concentrations of ethylbenzene in well MW-3 between July and August, and again in September. Concentrations of benzene ranged from a low of 3,700 parts per billion (ppb) in well MW-1 during September, to 67,000 ppb in well MW-3 (August), well above the current State Action Level of 1.0 ppb. Concentrations of total petroleum hydrocarbons as gasoline (TPH-G) also ranged from a low of 25,000 ppb in well MW-3 (September), to a high of 220,000 ppb (August), also in MW-3. Because the concentrations of contaminants have yet to stabilize or taper off, ground water sampling must continue on a monthly basis until further notice.

Further, trends in ground water flow directions are showing a strong component shift towards the east during each subsequent month of the third quarter. As such trends appear, it is imperative that monthly water level measurements continue for the proper interpretation of the hydrogeologic factors controlling the subsurface distribution of contaminants, both on- and off-site.

Mr. Ted Simas
RE: Xtra Oil Company, 3495 Castro Valley Blvd.
December 27, 1990
Page 2 of 2

The need for such monthly measurement was first iterated in correspondence from this Department dated June 5, 1990. To date, water levels have been reported only for the months of February, March, July, August and September. No measurements have been made during the months of April, May, June, October, and November. During a telephone conversation with Mr. John Cussen of the California Geophysical Group on December 26, Mr. Cussen indicated such level measurements were again made earlier this month. **We expect that monthly water level data collection will continue beginning January 1991 through June 1991, at a minimum.**

The need to assess the off-site impact to ground water and soil from contaminants leaving your site has become increasingly evident as concentrations of dissolved phase hydrocarbons remain high and ground water gradients continue to change. Therefore, you are to have your consultant begin preparation of a proposal outlining the next phase of the investigation, which is to include the search for the lateral extent of contaminants in both soil and ground water. You may wish to present the preliminary stages of this proposal at the joint meeting scheduled for January 17, 1991. A final draft will be expected for submittal to this Department within 15 days following this meeting, or by February 1, 1991.

The submittal of reports shall continue on a quarterly basis, and are due the first day of the second month of each subsequent quarter (i.e., February 1, May 1, August 1, and November 1). **The next quarterly report is due February 1, 1991, and is to document all activities occurring during the 4th quarter of 1990.**

Should you have any questions regarding the content of this letter, please call me at 415/271-4320.

Sincerely,


Scott O. Seery
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Howard Hatayama, DHS
John Fenstermacher, Chief, Real Estate Division,
James Chu, Alameda County Public Works Agency
Bob Bohman, Castro Valley Fire Department
John Converse, California Geophysical Group, Inc.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



December 27, 1990

Mr. John Fenstermacher
Alameda County Public Works Agency
399 Elmhurst Street
Hayward, CA 94544

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

RE: XTRA OIL COMPANY DBA SHELL OIL STATION, 3495 CASTRO VALLEY
BOULEVARD, CASTRO VALLEY

Dear Mr. Johnson:

This Department has scheduled a meeting in this office for **January 17, 1991** to discuss issues involving the county road widening project along Redwood Road, and its impact upon other activities planned at the referenced site.

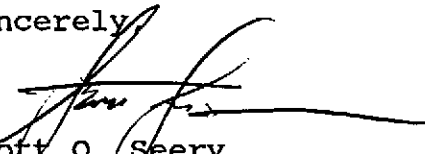
Specifically, the owner of the subject property, Mr. Ted Simas, has been directed by this Department to investigate and remediate soil and ground water contamination associated with releases from the underground storage tank (UST) systems at his site. Plans to remodel the station are also pending. Such remodeling will involve relocation and replacement of the UST cluster and dispenser islands, as well as construction of a convenience store. Excavation activities associated with the remodeling will enable Mr. Simas to complete a majority of the site's soil remediation in an efficient and timely fashion. The scheduling and success of his efforts, as well as the design of the station, will be largely affected by the issues related to the acquisition of a portion of his property along Redwood Road required for the road widening project.

The January 17 meeting has been called in an effort to find common ground upon which all interests may be met. Your presence at this meeting is essential to appropriately address all issues related to the county road project.

The meeting will convene promptly at **10:00 AM** in our office, 80 Swan Way, Room 200. Please call me at 415/271-4320, at your convenience, to confirm your attendance.

Thank you in advance for your cooperation.

Sincerely,


Scott O. Seery
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



December 27, 1990

Mr. Jim Sorensen
Alameda County Planning Department
399 Elmhurst Street, Room 136

Hayward, CA 94544

RE: XTRA OIL COMPANY DBA SHELL OIL STATION, 3495 CASTRO VALLEY
BOULEVARD, CASTRO VALLEY

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

Dear Mr. Johnson:

This Department has scheduled a meeting in this office for **January 17, 1991** to discuss issues involving the county road widening project along Redwood Road, and its impact upon other activities planned at the referenced site.


Specifically, the owner of the subject property, Mr. Ted Simas, has been directed by this Department to investigate and remediate soil and ground water contamination associated with releases from the underground storage tank (UST) systems at his site. Plans to remodel the station are also pending. Such remodeling will involve relocation and replacement of the UST cluster and dispenser islands, as well as construction of a convenience store. Excavation activities associated with the remodeling will enable Mr. Simas to complete a majority of the site's soil remediation in an efficient and timely fashion. The scheduling and success of his efforts, as well as the design of the station, will be largely affected by the issues related to the acquisition of a portion of his property along Redwood Road required for the road widening project.

The January 17 meeting has been called in an effort to find common ground upon which all interests may be met. Your presence at this meeting is essential to appropriately address all issues related to the county road project.

The meeting will convene promptly at **10:00 AM** in our office, 80 Swan Way, Room 200. Please call me at 415/271-4320, at your convenience, to confirm your attendance.

Thank you in advance for your cooperation.

Sincerely,


Scott O. Seery
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



December 27, 1990

Mr. Ralph Johnson
Alameda County Public Works Agency
399 Elmhurst Street
Hayward, CA 94544

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

RE: XTRA OIL COMPANY DBA SHELL OIL STATION, 3495 CASTRO VALLEY
BOULEVARD, CASTRO VALLEY

Dear Mr. Johnson:

This Department has scheduled a meeting in this office for **January 17, 1991** to discuss issues involving the county road widening project along Redwood Road, and its impact upon other activities planned at the referenced site.


Specifically, the owner of the subject property, Mr. Ted Simas, has been directed by this Department to investigate and remediate soil and ground water contamination associated with releases from the underground storage tank (UST) systems at his site. Plans to remodel the station are also pending. Such remodeling will involve relocation and replacement of the UST cluster and dispenser islands, as well as construction of a convenience store. Excavation activities associated with the remodeling will enable Mr. Simas to complete a majority of the site's soil remediation in an efficient and timely fashion. The scheduling and success of his efforts, as well as the design of the station, will be largely affected by the issues related to the acquisition of a portion of his property along Redwood Road required for the road widening project.

The January 17 meeting has been called in an effort to find common ground upon which all interests may be met. Your presence at this meeting is essential to appropriately address all issues related to the county road project.

The meeting will convene promptly at **10:00AM** in our office, 80 Swan Way, Room 200. Please call me at 415/271-4320, at your convenience, to confirm your attendance.

Thank you in advance for your cooperation.

Sincerely


Scott O. Seery
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division

November 20, 1990

Mr. Scott O. Seery
Department of Environmental Health
Alameda County
80 Swan Way Room 200
Oakland, CA 94121

Regarding: 3495 Castro Valley Blvd., Castro Valley
Quarterly Report

Dear Mr. Seery:

Enclosed is the quarterly report of California Geophysical Group, Inc. for the third(3rd) quarter of 1990 on the above site.

As suggested in the report, we request that the sampling schedule be changed from monthly to quarterly.

The report notes there is substantial groundwater contamination entering our property from an offsite, up gradient source. We would appreciate any information and assistance you can provide in identifying that source.

We are very concerned that our remediation efforts will be frustrated by continuing recontamination from that offsite source.

As we discussed with you earlier, the County plans to condemn approximately one-third of our property for road widening. This will require the relocation and remodeling of our entire operation (tanks, islands, office buildings, etc.). As part of that remodeling, we will remediate by over-excavating all the old tank locations and installing new tanks and lines meeting 1998 EPA standards. The construction needed to remediate cannot proceed without a County building permit.

Earlier this year, the County Real Estate Department indicated it would promptly proceed with its condemnation. We then submitted to the Planning Department a development plan for the remaining two-thirds of our property and anticipated the remodeling and remediation would proceed in 1991.

We have recently been told the condemnation will be delayed. We now understand the condemnation will occur in 1991. Until that condemnation occurs, we cannot proceed with construction. The Planning Department now says if we proceed with construction before the condemnation, we will have to dedicate, for free, one-third


1992?
20.11.1990

of our land as a condition to issuance of the necessary permits. We simply cannot afford to lose one-third of our lot without compensation.

In the interim, we will investigate further the offsite source of contamination entering our property. Remediation of that offsite source by the responsible party should reduce the contamination leaving our property by 50%.

A work plan will be forthcoming.

Very truly yours,



TED SIMAS

Enclosure

cc: Mr. Lester Feldman
RWQCB
1800 Harrison Suite 700
Oakland, CA 94612

white -env.health
 yellow -facility
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH
 Hazardous Materials Inspection Form

80 Swan Way, #200
 Oakland, CA 94621
 (415) 271-4320

II, III

Site ID # _____ Site Name Xtra Oil dba Shell Today's Date 7/27/90

Site Address 3495 Castro Valley Blvd.

City Castro Valley Zip 94576 Phone 865-9503

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

II.A BUSINESS PLANS (Title 19)

- 1. Immediate Reporting 2703
- 2. Bus. Plan Stds. 25503(b)
- 3. RR Cars > 30 days 25503.7
- 4. Inventory Information 25504(a)
- 5. Inventory Complete 2730
- 6. Emergency Response 25504(b)
- 7. Training 25504(c)
- 8. Deficiency 25505(a)
- 9. Modification 25505(b)

II.B ACUTELY HAZ MATLS

- 10. Registration Form Filed 25533(a)
- 11. Form Complete 25533(b)
- 12. RMPP Contents 25534(c)
- 13. Implement Sch. Req'd? (Y/N)
- 14. OffSite Conseq. Assess. 25624(c)
- 15. Probable Risk Assessment 25534(d)
- 16. Persons Responsible 25534(g)
- 17. Certification 25534(f)
- 18. Exemption Request? (Y/N) 25536(b)
- 19. Trade Secret Requested? 25538

III. UNDERGROUND TANKS (Title 23)

- General**
- 1. Permit Application 25284 (H&S)
- 2. Pipeline Leak Detection 25292 (H&S)
- 3. Records Maintenance 2712
- 4. Release Report 2651
- 5. Closure Plans 2670
- 6. Method
- 1) Monthly Test
- 2) Daily Vadose
- Semi-annual groundwater
- One time soils
- 3) Daily Vadose
- One time soils
- Annual tank test
- 4) Monthly Gndwater
- One time soils
- 5) Daily Inventory
- Annual tank testing
- Cont pipe leak det
- Vadose/gndwater mon.
- 6) Daily Inventory
- Annual tank testing
- Cont pipe leak det
- 7) Weekly Tank Gauge
- Annual tank testing
- 8) Annual Tank Testing
- Daily Inventory
- 9) Other _____
- 7. Precs Tank Test 2643
- Date: _____
- 8. Inventory Rec. 2644
- 9. Soil Testing 2646
- 10. Ground Water. 2647
- Monitoring for Existing Tanks**
- 11. Monitor Plan 2632
- 12. Access. Secure 2634
- 13. Plans Submit 2711
- Date: _____
- 14. As Built 2635
- Date: _____
- New Tanks**

Rev 6/88

Comments: 1:00-1:30 2:00-2:30
 On-site to witness soil sampling from waste oil tank pit. Sequoia Lab's technicians were on-site to collect samples. The backhoe operator was not available to either clean the hole out, continue excavation, or pull material out to be sampled.

[REDACTED]

Mr. Sines was advised to cover the excavated soil w/ Visqueen until it could be sampled and appropriately handled. ~~The~~ The need to address the over excavation of the w.o. pit now, or during fuel tank replacement (slated for 1991), is to be considered.

Contact: Ted Simas
 Title: owner
 Signature: Ted Simas

Inspector: S. Seery
 Signature: [Signature]

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



August 16, 1990

Mr. John Cussen
California Geophysical Group, Inc.
12709 Poway Road, Suite 202
Poway, CA 92064

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

RE: XTRA OIL COMPANY DBA SHELL SERVICE STATION, 3495 CASTRO VALLEY
BLVD.

Dear Mr. Cussen:

This letter follows our telephone conversation this afternoon during which was discussed the current status of the ongoing ground water investigation at the referenced site, a schedule to begin the installation of additional wells, and the over-excavation of the area in proximity to the former waste oil tank pit.

This Department agreed to postpone the required installation of up- and downgradient wells until our review of data presented within the next quarterly status report, due for submittal on October 1, 1990. This report will document sampling and other site activities occurring during the 3rd quarter 1990. Further, all wells are to be sampled monthly during this quarter. Sampling may be reduced to a quarterly schedule if concentrations of contaminants appear to stabilize or diminish.

Confirmation samples collected following the over-excavation of the waste oil pit area are to be analyzed for: total oil and grease (TOG), total petroleum hydrocarbons as both diesel and gasoline (TPH-D/G), and the volatile compounds benzene, toluene, ethylbenzene, and xylene (BTEX). The test methods used to analyze these samples must reflect those required by the San Francisco Bay Regional Water Quality Control Board (RWQCB), and performed by a laboratory certified by the State Department of Health Services (DHS) for those test method(s) performed.

Should you have any questions regarding the content of this letter, please call me at 415/271-4320.

Sincerely,


Scott O. Seery
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Department
Edgar Howell, Chief, Hazardous Materials Division

Mr. John Cussen
RE: 3495 Castro Valley Blvd.
August 16, 1990
Page 2 of 2

cc: (con't)

Howard Hatayama, DHS
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Bob Bohman, Castro Valley Fire Department
Ted Simas, Xtra Oil Company
files

CALIFORNIA GEOPHYSICAL GROUP, INC.

12709 Poway Road, Suite 202, Poway, CA 92064

Tel: (619) 486-1323

90 JUL 25 AM 10:47

July 23, 1990

Mr. Scott Seery
Hazardous Materials Program
80 Swan Way, Rm 200
Oakland, Ca. 94621

RE: XTRA Oil Company Station, 3495 Castro Valley Blvd., Castro Valley, Alameda County.

Dear Mr. Seery:

I have tried to contact you by phone for the past week, unfortunately you have not been available. Now, because I am leaving for two weeks, a few items remain unanswered. Therefore, I am writing this letter to advise you of what is going on at the site and what our present plans are.

We began drawing quarterly water sample on July 20, 1990, and also measured the water table. The data on the water table indicated that the hydraulic gradient has shifted to the south from its former direction of northwest. The chemical analysis are still being run so I am unable to comment on this at present.

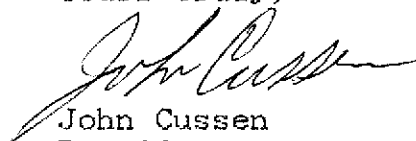
This new direction of the hydraulic gradient cause a problem, since your letter of June 5, 1990 indicated your desire to have an upgradient and downgradient well. Our work plan proposed two wells that would have met this requirement during the months of February and March, however, they do not at present. For this reason we feel the drilling of further monitoring wells should be put off for about 6 months or until we have a firm understanding of the hydraulics of the site. Drilling wells is expensive as you are aware and if they are positioned incorrectly they just become a waste of money.

We are proceeding with our plan for monthly water table measurements and quarterly chemical sampling. Quarterly reports will be sent to you.

We are planning to over-excavate the use oil pit. Your office will be notified prior to the starting this work. We will be taking bottom and sidewall samples of the over-excavation and we are attempting to eliminate all the contamination in this pit.

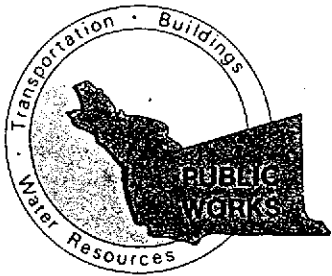
I will attempt to contact you on Aug. 10th. regarding these items.

Yours truly,



John Cussen
President

CC: Mr. Lester Feldman, RWQCB
Mr. Ted Simas, XTRA Oil CO.



COUNTY OF ALAMEDA
PUBLIC WORKS AGENCY

399 Elmhurst Street • Hayward, CA 94544-1395
(415) 670-5480

July 16, 1990

Mr. Ted Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

Dear Mr. Simas:

RE: WIDENING OF REDWOOD ROAD PROJECT; XTRA OIL COMPANY DBA SHELL STATION,
3495 CASTRO VALLEY BOULEVARD

Please make reference to the preliminary site assessment report dated June 5, 1990, sent to your attention from the Department of Environmental Health. This Agency is brought to the attention of the follow-up investigation and possible clean-up work related to the contaminated soil in the vicinity of the subject address.

We would like to inform you that the Redwood Road Widening Project is scheduled to be constructed in the summer months of 1992. In order to eliminate any conflict, you are advised to finish any work required of you to perform by the Department of Environmental Health by such time. If any of such work encroaches onto County Road right of way, you are required to obtain a road encroachment permit through our permit section. Please contact Mr. James Chu (670-5566) for any permit application details.

If you have any questions, please call me at 670-5486. Thank you for your cooperation.

Very truly yours,

TAT M. CHEUNG
SUPERVISING CIVIL ENGINEER

SF:pr

cc: James Chu, Permits
Scott O. Seery, Department of Environmental Health

July 5, 1990

Project # 4578963
Fee Paid \$700.00
Date 7/12/90

Mr. Scott Seery
Hazardous Materials Specialist
Alameda County Health Care Division
80 Swan Way Room 200
Oakland, CA 94621

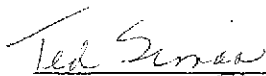
Regarding: 3495 Castro Valley Blvd.
Castro Valley

Dear Mr. Seery,

Please find the following enclosed:

1. Work plan for 2 additional wells from California Geophysical Group, Inc.
2. Work plan for waste oil tank area
3. Quality control
4. Health and Safety
5. Check in the amount of \$700.00

Very truly yours,



Ted Simas (S)

Enclosures

CALIFORNIA GEOPHYSICAL GROUP, INC.

12709 Poway Road, Suite 202, Poway, CA 92064

Tel: (619) 486-1323

June 29, 1990

Mr. Scott Seery
Hazardous Materials Specialist
Alameda County Health Care Division
80 Swan Way, Rm 200
Oakland, CA 94621

RE: Addendum to work plan of June 14, 1990, for the Shell Station located at 3495 Castro Valley Blvd.

Dear Mr. Seery:

Your letter of June 5, 1990 requested further work be performed in the area of the Waste Oil Pit. We therefore, propose to over excavate the pit to limits where we believe the contamination is non-existent and then take one soil sample on each of the 5 faces of the pit. Your office will be notified at least 72 hours prior to the time the work will take place and we request one of your inspectors be present to assure yourselves the samples are taken in the proper location.


Samples will be collected in a 2"X6" brass tube driven into the soil with a hammer, capped with a plastic cover and taped shut with electrical tape. Since this tank stored waste oil we feel the proper analytical test for these samples to assure the tank contaminates are no longer present is "Total Oil & Grease, Gravimetric 413.1, 503AE, and 503DE".

The soil removed from the pit will be stored on a sheet of visqueen and covered with the same. Soil analysis for TPH, BTX&E and Organic Lead will be performed on the stockpile to assess the type of disposal necessary. Stockpile testing will be done in accordance with EPA SW 846 procedures.

Once the limits of the pit are established as clean the pit will be backfilled with clean imported backfill to the ground surface.

No treatment of the stockpile is contemplated at this time and the material will be removed from the site to a Class I or Class II disposal site.

Yours truly,



John Cussen
President

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Certified Mailer P# 062 128 196

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

June 5, 1990

Mr. Ted Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: PRELIMINARY SITE ASSESSMENT REPORT; XTRA OIL COMPANY DBA SHELL
STATION, 3495 CASTRO VALLEY BLVD., CASTRO VALLEY, ALAMEDA COUNTY

Dear Mr. Simas:

This Department is in receipt and has completed review of the March 28, 1990 Western Geo-Engineers (WEGE) document entitled "Preliminary Assessment Report", as submitted under Xtra Oil Company cover dated May 9, 1990. This report documents a preliminary soils and groundwater investigation conducted at the referenced site between February 14-20 and March 19, 1990.

The noted WEGE report identifies the presence of dissolved-phase fuel hydrocarbons in groundwater collected from wells MW-1, -2, and -3 well in excess of State Department of Health Services (DHS) Action Levels (AL). Groundwater collected March 19, 1990 from well MW-3, for example, exhibited such elevated concentrations of dissolved-phase hydrocarbon constituents, with total petroleum hydrocarbons as gasoline (TPH-G), benzene, toluene, ethylbenzene, and xylene (BTEX) at 210, 38, 28, 1.8, and 12 milligrams per liter (mg/l = parts per million: ppm), respectively. For comparison, the current ALs for the volatile compounds BTEX are 0.0007, 0.1, 0.68, and 0.62 ppm, respectively.

Soil samples collected during boring advancement and subsequently analyzed by Chemtech Analytical Laboratories identified TPH-G concentrations as high as 1400 ppm (MW-1 @ 10-feet below grade (BG)), and total oil and grease (TOG), 200 ppm (MW-3 @ 5-feet BG). Current DHS policy regards soils contaminated with TPH-G/D or TOG in excess of 1000 ppm as hazardous waste. Further, the San Francisco Bay Regional Water Quality Control Board (RWQCB) requires the removal of soils contaminated with TPH-G/D or TOG in excess of 100 ppm, or implement in-situ treatment to reduce contamination to below 100 ppm and continue with long-term groundwater monitoring, independent of that required for standard treatment of contaminated groundwater.

Soil samples collected at 10- and 12-feet BG from exploratory borings SB-1, -2, and -3 were analyzed by WEGE personnel on-site using modified LUFT analyses screening methods. These six (6) samples all showed elevated levels of total volatile organic (TVO) compounds, up to 2000⁺ ppm (SB-2 and -3 @ 12-feet BG).

P 062 128 196

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to	Xtra Oil Co.
Street and No.	2307 Pacific Ave
P.O., State and ZIP Code	Alameda, Ca 94501
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Notice Packet showing to whom Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	6/6/90

PS Form 3800, June 1988

Put your address in "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check boxes for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. Ted Sernas Xtra Oil Co. 2307 Pacific Ave Alameda, Ca 94501	4. Article Number P 062128196
5. Signature - Address X	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature - Agent X Carol Sernas	Always obtain signature of addressee or agent and DATE DELIVERED.
7. Date of Delivery 6/18/90	8. Addressee's Address (ONLY if requested and fee paid)

Mr. Ted Simas

RE: Xtra Oil Co. dba Shell Station, 3495 Castro Valley Blvd.

June 5, 1990

Page 2 of 5

The need for further site assessment is apparent. No groundwater or soil information is currently available in the inferred downgradient position from the fuel tank cluster. All present wells have been advanced in either the downgradient or cross-gradient position from this tank cluster and the former waste oil tank pit. The groundwater and soils on-site, both up- and cross-gradient from the inferred source(s), are already substantially impacted by petroleum hydrocarbons.

As a result of the aforementioned results of the initial phase of this investigation, additional investigation and remediation of soils and groundwater are required. This will initially involve the installation of additional wells along the eastern and northeastern perimeters of the site, the installation of at least one (1) well in the inferred upgradient position from the waste oil tank (i.e., upgradient of the site), and the over-excavation of the former waste oil tank pit area. Depending on the results of this next phase of the investigation, additional wells and borings will likely be required in an effort to identify the leading edge of the contaminant plume as it migrates away from its source, potentially leading such an investigation off-site.

Future remediation and assessment work must proceed in a focused and timely fashion. This point is particularly important in light of the Alameda County Public Works Agency road widening project along Redwood Road, from Castro Valley Blvd. south towards Grove Way. This project is tentatively scheduled to begin in the spring of 1992.

In order to proceed with this next phase of the site investigation, you should contract for the professional services of a reputable environmental/geotechnical firm. Your responsibility is to have the consultant submit for review a proposal outlining planned activities pertinent to meeting the criteria broadly outlined in this letter and, once approved, implement it. The elements of such a proposal shall be in accordance with the basic technical requirements outlined in the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks.

This proposal is due for submittal within 30-days of the date of this letter, or by July 5, 1990. Once this proposal has been reviewed and approved, work should commence no later than August 5, 1990. Accompanying this proposal should be a check for an additional \$700 to offset the current \$264 deficit in your account, and to cover the immediate future expenses incurred by this Department in oversight of this project.

Mr. Ted Simas

RE: Xtra Oil Co. dba Shell Station, 3495 Castro Valley Blvd.

June 5, 1990

Page 3 of 5

A report must be submitted within 30-days after initiation of this phase of work at this site. Subsequent reports must be submitted quarterly until this project qualifies for RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter (i.e., August 1, November 1, February 1, and May 1). The reports should describe the status of the remediation/investigation and must include, among others, the following:

- o Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- o Results of aquifer pump or drawdown tests including maps showing zone(s) of capture
- o Status of groundwater contamination characterization
- o Interpretation of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each component, etc.
- o Recommendations or plans for additional investigative work or remediation

All proposals and reports must be signed by a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. Please include a statement of qualifications for each lead professional involved in the project. Further, copies of all reports and proposals must also be submitted to the RWQCB (Attn: Lester Feldman).

In addition to the conditions noted above in regards to future assessment work, the following tasks must also be performed following the protocol stated herein:

- 1) Water levels of each well, including those slated for installation this quarter, must be measured and recorded monthly for the next year, and then quarterly thereafter, allowing sufficient groundwater gradient information to be collected and analyzed for use as the partial basis for future determinations and/or recommendations;

Mr. Ted Simas

RE: Xtra Oil dba Shell Station, 3495 Castro Valley Blvd.

June 5, 1990

Page 4 of 5

- 2) All monitoring wells, both existing and proposed, on-site or off, are to be sampled monthly for the first quarter (3 mos.). This monthly sampling frequency may be reduced after the first three months to quarterly sampling, provided the concentrations of target compounds level out or taper off. If, during the first quarter, concentrations continue to rise or fluctuate between sampling events, monthly sampling will continue to be required until such levels do stabilize or taper off;
- 3) Once determined, all wells at the "leading edge" of the contaminant plume, those showing nondetectable (ND) concentrations of target compounds following initial sample analyses, are to be sampled monthly to continually confirm their ND status.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a late response could result in the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day. Any extensions of stated deadlines, or modifications of required tasks, must be confirmed in writing by either this agency or the RWQCB.

For your information, I will be out of the office between June 6 and June 26, 1990. Please call me at 415/271-4320 after June 26, 1990 should you have any questions. Or, you may contact Mr. Steve Luquire of the RWQCB (415/464-1255) should you have any questions during the period of my absence.

Sincerely,



Scott O. Seery
Hazardous Materials Specialist

SOS:sos

cc: Rafat A. Shahid, Assistant Agency Director, Department of
Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Steve Luquire, RWQCB
Howard Hatayama, DHS

Mr. Ted Simas

RE: Xtra Oil Co. dba Shell Station, 3495 Castro Valley Blvd.

June 5, 1990

Page 5 of 5

cc: (con. 't)

Terry Boyle, Alameda County Council

Tat Cheung, Alameda County Public Works Agency

John Fenstermacher, Chief, Real Estate Division, Alameda County
Public Works Agency

G. Robert Hale, Alameda County Public Works Agency

James Chu, Alameda County Public Works Agency

Bob Bohman, Castro Valley Fire Department

George Converse, WEGE

files

May 9, 1990

Alameda County Health Care Services Agency
Department of Environmental Health
Hazardous Material Division
80 Swan Way Room 200
Oakland, CA 94621

Attention: Scott Seery

Regarding: 3495 Castro Valley Blvd.
Castro Valley

Dear Mr. Seery,

Enclosed please find Preliminary Assessment Report on the above location.

As we recently discussed, the County is in the process of condemning a portion of this site. We have had several meetings with Tat Cheung, Supervising Civil Engineer, Stanley Fung, Civil Engineer, John Fenstermacher, Real Estate Division and Gerald Wallace, Planner, all of Alameda County, regarding our station's remodelling plans.

Once the County determines how much land they plan to take, we plan to go forward with our remodelling program. Engineering has indicated that they will define the property they want in a short time.

Very truly yours,


Ted Simas

Enclosure

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



scott

Telephone Number: (415)

January 16, 1990

Mr. Ted Simas
Xtra Oil Company
2307 Pacific Avenue
Alameda, CA 94501

RE: SOIL VAPOR/PROBE SURVEY; XTRA OIL COMPANY DBA SHELL
SERVICE STATION, 3496 CASTRO VALLEY BLVD., CASTRO VALLEY

Dear Mr. Simas:

Our office has completed review of the Western Geo-Engineers proposal dated December 18, 1989, as submitted under Xtra Oil Company cover dated December 28, 1989, which describes a soil vapor/probe survey slated for the referenced site.

We have accepted this limited work plan only as a preliminary aid in siting groundwater monitoring wells required following discovery of elevated levels of soil contamination beneath the former waste oil tank pit. Development and submittal of a site assessment proposal should not be delayed while waiting for the soil vapor/probe survey to be completed. Rather, this soil survey will only finalize well locations based on laboratory results and observations made in the field. Please keep in mind that at least one (1) of the proposed groundwater wells must be within 10 feet and down gradient of the waste oil tank pit.

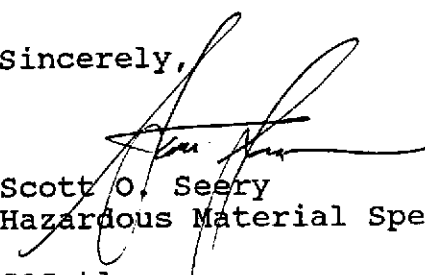
Note:
soil vapor
study wells
performed

Scheduling of this site assessment task should begin immediately. Further, we will expect a finalized site assessment proposal, including the locations of proposed monitoring wells, within two (2) weeks of the completion of the soil vapor/probe survey.

Mr. Ted Simas
RE: 3496 Castro Valley Blvd.
January 16, 1990
Page 2 of 2

Please contact this office when work has been scheduled to begin.
Should you have any questions, please call me at 415/271-4320.

Sincerely,



Scott O. Seery
Hazardous Material Specialist

SOS:tlh

cc: Rafat A. Shahid, Assistant Agency Director, Alameda County
Department of Environmental Health
Gil Jensen, Alameda County District Attorney, Consumer
and Environmental Protection Division
Howard Hatayama, DHS
Lester Feldman, RWQCB
Bob Bohman, Castro Valley Fire Dept.
Jack Napper, WGE
George Converse, WGE
Files

December 4, 1989

ALAMEDA COUNTY HEALTH SERVICES
Hazardous Material Program
80 Swan Way Room 200
Oakland, CA 94621

Attention: Scott Seery

Re: 3495 Castro Valley Blvd.
Castro Valley

89 DEC -5 PM 12:14

Dear Mr. Seery,

Per our phone conversation of Wednesday, November 29, 1989, this is to confirm that I have contracted with George Converse of Western Geo-Engineers, to handle the environmental concerns at the above mentioned location.

I should be receiving the plan for correction very soon, and shall forward same to you for your consideration.

Very truly yours,


Ted Simas 



DEPARTMENT OF ENVIRONMENTAL HEALTH
CONTAMINATION CONTROL DIVISION
1500 CALIFORNIA STREET
SAN FRANCISCO, CALIFORNIA 94133
TELEPHONE 478-2300
FAX 478-4320

September 1, 1989

Mr. Terrance Carter
Aqua Science Engineers, Inc.
P. O. Box 535
San Ramon, CA 94583

RE: SITE ASSESSMENT PROPOSAL: XTRA OIL COMPANY dba SHELL SERVICE STN.,
3496 CASTRO VALLEY BLVD., CASTRO VALLEY

Dear Mr. Carter:

This letter is in response to our review of the Aqua Science Engineers, Inc. proposed work plan dated June 29, 1989, and the August 14, 1989 revision to this plan, for the remediation and investigation of subsurface contamination at the referenced site. This proposal, and its addendum, was submitted on behalf of Xtra Oil Company as their Plan of Correction in response to the February 24, 1989 Notice of Violation and the May 25, 1989 Second Notice of Violation.

This work plan may be approved for the first stages of site contaminant assessment provided the following issues are resolved:

- 1) Describe what method(s) will be used in the field to screen clean vs. contaminated soils encountered during reexcavation of the former waste oil tank pit (i.e., OVA/HNU meters, odor, staining, etc.);
- 2) Provide assurance that analytical tests performed on samples collected during excavation will reflect those required for waste oil tank investigations by the SFRWQCB. Reference the October 6, 1988 revision of Table 2, Recommended Minimum Verification Analyses for Underground Tank Leaks, Regional Board Staff Recommendations;

Mr. Terrance Carter
RE: Xtra Oil
3496 Castro Valley Blvd.
Castro Valley
September 1, 1989
Page 2 of 3

- 3) Describe security measures planned for the excavation and soil stock pile;
- 4) Discuss placement rationale for wells MW-2 and MW-3;
- 5) During boring advancement, sampling should begin at a depth commensurate with the bottom of the former UST, at every 5-feet in depth thereafter, and at any change in lithology;
- 6) Discuss well development method(s) and criteria for determining the adequacy of development;
- 7) Well screen interval must adequately accommodate seasonal fluctuations in groundwater level. Figure 2, Typical Monitoring Facility, does not reflect that this issue has been addressed;
- 8) Wells MW-2 and MW-3 must also be monitored and sampled, as is MW-1. Determination of sampling frequency may be addressed following initial sampling episode and laboratory results;
- 9) Discuss the following:
 - water level measurement procedures
 - well purge water disposal plans
 - sample collection procedures
 - sample analyses to be used
 - quality assurance/quality control plans for sample collection and analysis
 - chain of custody procedures
- 10) Provide a Site Safety Plan which follows guidelines specified under Part 1910.120(i)(2) of 29 CFR;
- 11) Provide assurance that wells will be constructed by a driller with a valid State Water Well Contractor's License (C-57), and that they will be installed under appropriate Zone 7 permits;
- 12) All reports and proposals must be submitted under seal of a California-Registered Geologist, California-Certified Engineering Geologist, or a California-Registered Civil Engineer. Include a statement of qualifications.

Please submit a response which adequately addresses the previous list of items.

Mr. Terrance Carter
RE: Xtra Oil
3496 Castro Valley Blvd.
Castro Valley
September 1, 1989
Page 3 of 3

Should you have any questions, please contact Scott Seery, Hazardous Materials Specialist, at 415/271-4320.

Sincerely,



for Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:SOS:mam

cc: Ted Simas, Xtra Oil Company
Bob Bohman, Castro Valley Fire Dept.
Howard Hatayama, DHS
Lester Feldman, RWQCB
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Scott Seery, Alameda County Hazardous Materials Division
Files



June 29, 1989

Mr. Scott Seery
Hazardous Materials Specialist
Alameda County Health Care Division
80 Swan Way, Rm 200
Oakland, CA 94621

**RE: PLAN OF CORRECTION FOR WASTE OIL TANK AT SHELL SERVICE
STATION, 3496 CASTRO VALLEY BOULEVARD, CASTRO VALLEY, CA**

Dear Mr. Seery:

On behalf of Mr. Ted Simas of Xtra Oil Company I am providing you with the a Plan of Correction for the former waste oil tank located at the above address. Our letter of 5 June 1989 detailed the sampling that has already taken place.

Based on the results of the soil sample taken from the former waste oil tank, ASE's Plan of Correction is to further evaluate the impact of the release of petroleum contaminants from the waste oil tank on soil and groundwater in the vicinity of the site. ASE intends to complete the work in four tasks. In response to our phone conversation of today, Task 3 will be elaborated upon at a later date in accordance with the Regional Water Quality Control Borad Guidelines for Addressing Soil and Groundwater - Appendix A.

Task 1 ~~Re-excavate~~ soil from the waste oil tank and stockpile the soil on visqueen. We intend to excavate until as much of the contaminated soil as possible. Soil samples will be taken from the excavated pit to confirm if the contaminated soil was removed.

Task 2 Soil samples will be collected from the stockpiled soil and the results will determine the suitability of disposal at a Class I or Class II site. No on site treatment is proposed.

Task 3 In accordance with agency guidelines.


~~_____~~ According to the Alameda County Water District - Zone 7, the seasonal high for groundwater in the vicinity is 35 to 40 feet. Should groundwater not be encountered, the well will be completed to a depth of 45 feet. Based on the results of the samples taken from the well, additional wells may be proposed.

Task 4 ASE will prepare a written report summarizing the work performed after completion of all field work and once analytical results are known. The report will include recommendations for further work and well sampling.

We expect to complete Task 1 by July 15; Tasks 2, 3 and 4 by August 4, 1989. We will notify you three days prior to beginning any on-site work.

Please let me know if the plan meets with your approval.

Sincerely,


Terrance E. Carter
Manager, Engineering



June 5, 1989

Mr. Rafat A. Shaid
Chief, Hazardous Materials Division
Alameda County Health Care Services
80 Swan Way, Rm 200
Oakland, CA 94621

RE: SHELL STATION, 3496 CASTRO VALLEY BLVD., CASTRO VALLEY

Dear Mr. Shaid:

This letter is to inform you that Mr. Edward T. Simas has retained Aqua Science Engineers to assist in developing a Plan of Correction in response to your letter of May 25, 1989 (attached). I will be meeting with Mr. Simas on June 7, 1989 to develop the plan. We expect to deliver the plan to you no later than June 30, 1989, we therefore request an extension from the date contained in the May 25 letter of fifteen days.

By way of background, we were contacted by Mr. Simas in early April 1989 and asked to collect a soil samples, per agency requirements, from beneath a 550-gallon waste oil tank located at the above address. On April 24, 1989 I contacted Mr. Scott Seery of your office to inform him of the projected soil sample collection. Mr. Seery indicated that a Plan of Correction should be prepared prior to any activity at the site and submitted for his review. I was unaware of this at that time, however, upon arriving at the site later that day, I relayed my conversation with Scott to Mr. Simas.

[REDACTED] Soil sample results are attached. Mr. Simas and I agreed to develop a plan once the results were known.

On June 5, 1989 I informed Mr. Simas of the results and indicated that additional excavation and sampling will be required and that a groundwater investigation will also be required. These recommendations will be contained in more detail in the forthcoming Plan of Correction.

Mr. Simas is very concerned with meeting all agency requirements and we will incorporate the required steps in the forthcoming Plan of Correction. Please contact me at (415) 820-9391 if you have any questions or comments. On behalf of Mr. Simas we look forward to working with you in this project.

Sincerely,

Terrance E. Carter
Terrance E. Carter
Engineering Services

TEC:ds

cc: Gil Jensen, Alameda County District Attorney
Scott Hugenberger, RWQCB
Bob Bohman, Castro Valley Fire Department
Howard Hatayama, DHS
Scott Seery, Alameda County Hazardous Materials Division

Enclosures

ALAMEDA COUNTY
DEPT. OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Certified Mailer # P 833 981 430

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

May 25, 1989

Mr. Edward T. Simas
Xtra Oil Company
2200 Durant Ave.
Berkeley, CA 94704

RE: SHELL STATION, 3496 CASTRO VALLEY BLVD., CASTRO VALLEY

SECOND NOTICE OF VIOLATION

Dear Mr. Simas:

This Second Notice of Violation is in response to your failure to submit a Plan of Correction as required pursuant to Section 66328(d) of Title 22, California Code of Regulations, for violations of this code outlined in a Notice of Violation sent under Certified Mailer #P 833 981 183 on February 24, 1989 in which your Plan of Correction was initially requested. Enclosed is a copy of the referenced initial Notice of Violation.

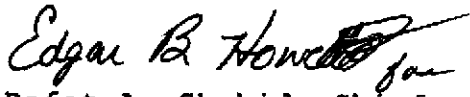
Further, a subsequent meeting on March 27, 1989 between yourself, Mrs. Simas, and Mr. Scott Seery of this office provided an extension to the due date until April 27, 1989 for submittal of the soil sampling plan for the waste oil underground storage tank excavation, one element of the requested Plan of Correction. The subject of this meeting is summarized in the attached letter dated March 27, 1989. To date, no plan has been submitted, nor have you been in contact with this office since the March 27th meeting.

At this time, you are requested to respond to this Notice within fifteen (15) days from the date of this letter by the submittal of your Plan of Correction which addresses all conditions noted in the original violation letter. Failure to fully respond to this Notice will result in your case being referred to the Alameda County District Attorney's Office for enforcement action. Your attention is directed to Section 25189.5 of the California Health and Safety Code which provides for fines of up to \$50,000 for each day of violation and jail sentences of up to 36 months.

Mr. Edward T. Simas
RE: 3496 Castro Valley Blvd.
Castro Valley
May 25, 1989
Page 2 of 2

Please contact Scott Seery, Hazardous Materials Specialist, at
415/271-4320.

Sincerely,



Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:SOS:mam

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Scott Hugenberg, RWQCB
Bob Bohman, Castro Valley Fire Department
Howard Hatayama, DHS
Scott Seery, Alameda County Hazardous Materials Division
Files

Enclosure



REPORT OF LABORATORY ANALYSIS

Office:
 Minneapolis, Minnesota
 Tampa, Florida
 Coralville, Iowa
 Novato, California

AquaScience Engineers, Inc.
 2500 Old Crow Canyon Rd.
 Suite 121
 San Ramon, CA 94583

June 06, 1989
 PACE Project Number: 490508502
 PACE WP Number: WPPLAB #748

Attn: Mr. Terry Carter

Simas Oil

Date Sample(s) Collected: 05/05/89
 Date Sample(s) Received: 05/08/89

PACE Sample Number:			728410
<u>Parameter</u>	<u>Units</u>	<u>MDL</u>	<u>T1</u>

ORGANIC ANALYSIS

EXTRACTABLE FUELS			
Extractable Fuels, as Diesel	mg/kg	10	980 (*)
Sonication Extraction, Date Started			05/09/89

TOTAL OIL AND GREASE (GRAV. EPA 9071)			
Total Oil and Grease (Freon Extractable)	mg/kg wet	50	426.5
Date Extracted			05/10/89

VOLATILE ORGANICS, EPA METHOD 8240 GC/MS			
Dichlorodifluoromethane	ug/kg	10	ND
Chloromethane	ug/kg	10	ND
Vinyl Chloride	ug/kg	10	ND
Bromomethane	ug/kg	10	ND
Chloroethane	ug/kg	10	ND
Trichlorofluoromethane	ug/kg	5	ND
2-Butanone (MEK)	ug/kg	10	ND
Iodomethane	ug/kg	5	ND
1,1-Dichloroethene	ug/kg	5	ND
Carbon Disulfide	ug/kg	5	ND
Acrylonitrile	ug/kg	5	ND
Methylene Chloride	ug/kg	5	ND
trans-1,2-Dichloroethene	ug/kg	5	ND
1,1-Dichloroethane	ug/kg	5	ND
Chloroform	ug/kg	5	ND
1,1,1-Trichloroethane	ug/kg	5	ND
1,2-Dichloroethane	ug/kg	5	ND
Carbon Tetrachloride	ug/kg	5	ND

MDL Method Detection Limit
 ND Not detected at or above the MDL.
 (*) Product heavier than diesel seen.

Mr. Terry Carter
Page 2

June 06, 1989
PACE Project Number: 490508502

PACE Sample Number:

728410

Parameter

Units

MDL

T1

ORGANIC ANALYSIS

VOLATILE ORGANICS, EPA METHOD 8240 GC/MS

Benzene	ug/kg	5	ND
1,2-Dichloropropane	ug/kg	5	ND
Trichloroethene	ug/kg	5	ND
Dibromomethane	ug/kg	5	ND
Bromodichloromethane	ug/kg	5	ND
trans-1,3-Dichloropropene	ug/kg	5	ND
3-Methyl-2-pentanone (MIBK)	ug/kg	10	ND
Toluene	ug/kg	5	12
cis-1,3-Dichloropropene	ug/kg	5	ND
1,1,2-Trichloroethane	ug/kg	5	ND
2-Chloroethylvinyl Ether	ug/kg	5	ND
Ethylmethacrylate	ug/kg	5	ND
Dibromochloromethane	ug/kg	5	ND
Tetrachloroethene	ug/kg	5	ND
Chlorobenzene	ug/kg	5	ND
Ethylbenzene	ug/kg	5	18
Bromoform	ug/kg	5	ND
Xylene(s) Total	ug/kg	5	266
1,1,2,2,-Tetrachloroethane	ug/kg	5	ND
1,2,3-Trichloropropane	ug/kg	5	ND
1,4-Dichloro-2-butene	ug/kg	5	ND
1,3-Dichlorobenzene	ug/kg	5	ND
1,4-Dichlorobenzene	ug/kg	5	ND
1,2-Dichlorobenzene	ug/kg	5	ND
1,2-Dichloroethane-d4 (Surrog. Recovery)			107%
Toluene-d8 (Surrogate Recovery)			121%
4-Bromofluorobenzene (Surrog. Recovery)			88%

ND Not detected at or above the MDL.
MDL Method Detection Limit

Xtra

OIL COMPANY

NEW ADDRESS: 2307 Pacific Ave., Alameda, CA 94501
2200 DURANT AVE. BERKELEY, CA 94704 (415) 548-0330
Tel. (415) 865-9503 FAX (415) 865-1889

June 1, 1989

Alameda County Health Care Services
Department of Environmental Health
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621

Attention: Rafat A. Shahid, Chief
Hazardous Materials Division

Re: Shell Station
3495 Castro Valley Blvd.
Castro Valley

Dear Mr. Shahid:

Regarding your letter dated 5/25/89:

1. We contacted and hired Aqua Science Engineers Inc., Terrance E. Carter (per your list).
2. Mr. Carter called and spoke to Mr. Seery of your office on or about April 24, 1989, to determine the requirements of your office.
3. Aqua Science proceeded to take samples on Monday, April 24, 1989, after the conversation with Scott Seery.
4. We have not yet received a report as to the results of any findings.
5. Because of the receipt of your letter, we have again tried to contact Mr. Carter of Aqua Science to determine the delay.

Very truly yours,


Edward T. Simas

cc: Terrance E. Carter, Aqua Science Engineers Inc.
Scott Seery, Alameda County Hazardous Materials Division

6/2/89

ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Certified Mailer # P 833 981 430

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

May 25, 1989

Mr. Edward T. Simas
Xtra Oil Company
2200 Durant Ave.
Berkeley, CA 94704

RE: SHELL STATION, 3496 CASTRO VALLEY BLVD., CASTRO VALLEY

SECOND NOTICE OF VIOLATION

Dear Mr. Simas:

This Second Notice of Violation is in response to your failure to submit a Plan of Correction as required pursuant to Section 66328(d) of Title 22, California Code of Regulations, for violations of this code outlined in a Notice of Violation sent under Certified Mailer #P 833 981 183 on February 24, 1989 in which your Plan of Correction was initially requested. Enclosed is a copy of the referenced initial Notice of Violation.

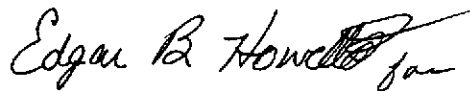
Further, a subsequent meeting on March 27, 1989 between yourself, Mrs. Simas, and Mr. Scott Seery of this office provided an extension to the due date until April 27, 1989 for submittal of the soil sampling plan for the waste oil underground storage tank excavation, one element of the requested Plan of Correction. The subject of this meeting is summarized in the attached letter dated March 27, 1989. To date, no plan has been submitted, nor have you been in contact with this office since the March 27th meeting.

At this time, you are requested to respond to this Notice within fifteen (15) days from the date of this letter by the submittal of your Plan of Correction which addresses all conditions noted in the original violation letter. Failure to fully respond to this Notice will result in your case being referred to the Alameda County District Attorney's Office for enforcement action. Your attention is directed to Section 25189.5 of the California Health and Safety Code which provides for fines of up to \$50,000 for each day of violation and jail sentences of up to 36 months.

Mr. Edward T. Simas
RE: 3496 Castro Valley Blvd.
Castro Valley
May 25, 1989
Page 2 of 2

Please contact Scott Seery, Hazardous Materials Specialist, at
415/271-4320.

Sincerely,



Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:SOS:mam

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Scott Hugenberger, RWQCB
Bob Bohman, Castro Valley Fire Department
Howard Hatayama, DHS
Scott Seery, Alameda County Hazardous Materials Division
Files

Enclosure

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

March 27, 1989

Mr. Edward T. Simas
Xtra Oil Company
2200 Durant Ave.
Berkeley, CA 94704

RE: SHELL STATION, 3496 CASTRO VALLEY BLVD., CASTRO VALLEY

Dear Mr. Simas:

This letter follows the meeting of March 27, 1989 between yourself, Mrs. Simas, and Mr. Scott Seery of this office. This meeting was regarding your intentions to replace the four (4) underground storage tanks (UST) currently in operation at the referenced site, and the soil sample proposal for the previously-removed waste oil UST.

As was explained to you during the March 27 meeting, proposals for the closure and installation of the UST's at the noted site are to be submitted as discrete proposals. Each proposal should be accompanied by a separate check to cover the time spent in our review of these plans. The fee schedule provided to you should be referenced to determine the amount of each check.

Mr. Seery agreed with your request to extend the deadline for submittal of the waste oil UST sampling plan. This extension was granted so that you might consolidate your efforts for this task with those sampling activities associated with the closure of the remaining tanks. You indicated that proposals for the tank closures/ installations are currently out to bid and that a finalized proposal is planned for submittal within 30 days. Therefore, we have extended by this 30 day period the due date for the waste oil UST sampling plan proposal.

Mr. Edward Simas
RE: 3496 Castro Valley Blvd.
Castro Valley
March 27, 1989
Page 2 of 2

Should you have any further questions, please contact Scott Seery,
Hazardous Materials Specialist at 415/271-4320.

Sincerely,

Rafat A. Shahid
Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:SOS:mam

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Bob Bohman, Castro Valley Fire Department
Scott Seery, Alameda County Hazardous Materials Division
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



Department of Environmental Health
Hazardous Materials Division
80 Swan V., Room 200
Oakland, CA 94621

Telephone Number: (415) 271-4320

Certified Mailer # P 833 981 183

February 24, 1989

Mr. Edward T. Simas
Xtra Oil Company
2200 Durant Ave.
Berkeley, CA 94704

RE: WASTE OIL TANK CLOSURE, SHELL STATION, 3495 CASTRO VALLEY
BLVD., CASTRO VALLEY

***** NOTICE OF VIOLATION *****

Dear Mr. Simas:

This letter is in response to information submitted under cover dated February 3, 1989 by Mrs. Carol Simas, and a subsequent phone conversation between her and Mr. Scott Seery of this office the week of February 5. The referenced letter and phone conversation was regarding the closure of an underground waste oil storage tank at the noted facility.

Mr. Larry Seto of this office was originally notified in late October 1988 by Mr. Bob Bohman of the Castro Valley Fire Department that an underground storage tank (UST) had been removed and was currently resting above grade at the referenced facility. This was our first notification of the tank closure. The Fire Department also had not been properly notified of the removal of this tank and, in fact, the tank was only noticed by Mr. Bohman one afternoon while driving by the facility. Section 2670(f) of Title 23, California Code of Regulations (CCR), requires that before an UST may be closed, the tank owner must submit a proposal to the local agency for review and approval before closure activities may begin.

Following this agency's notification by the Castro Valley Fire Department, Mr. Seto visited your facility on October 28, 1988. Mr. Seto delivered an Underground Tank Closure form to an employee at the facility and spoke with Mrs. Simas on the phone. He explained that no further activity was to occur until a closure plan had been submitted and approved by this office. A photograph taken on that date clearly shows that the fire department had cordoned off the area where the tank was located. Apparently,

Shell Station
3495 Castro Valley Blvd.
Castro Valley
February 24, 1989
Page 2 of 4

our request was ignored, for, according to a copy of a manifest later submitted to our office, the tank was subsequently hauled off-site on November 7, 1988 by H & H Ship Service, approximately a week after directed by this office not to continue with closure activities. We did not receive a closure plan until February 6, 1989, more than four (4) months after the tank was excavated and transported off-site. In its current form, this plan is inadequate and would not have been approved without modification.

Mrs. Simas indicated that neither you nor your associates understood that certain regulatory protocol must be followed before, during, and after the closure of an UST. However, even when informed that no further closure activities may take place until a closure plan had been submitted to and approved by this office, the tank was transported off-site. Please be advised that Xtra Oil Company is currently in violation of certain sections of Titles 22 and 23, California Code of Regulations (CCR), including:

Section 2670(f), 23 CCR - Requires an UST owner to submit a closure plan to the local implementing agency prior to closure.

Section 66336, 22 CCR - Requires any person, upon the direction of the Department, to cease and desist from specified actions which would violate regulatory provisions.

The State Health and Safety Code provides for the imposition of civil and/or criminal penalties upon conviction for violations of the CCR, and can include fines up to \$5000 per day, per violation, and jail sentences of up to 36 months. Please be advised that your case is being referred to the Alameda County District Attorney for possible enforcement action.

In order to resolve our concerns and complete closure activities involving the referenced waste oil tank, several items must be addressed, as follows:

1) Remittance of applicable fees:

- closure plan review and permit fee	\$ 666
- penalties	<u>333</u>
TOTAL:	\$ 999

Shell Station
3495 Castro Valley Blvd.
Castro Valley
February 24, 1989
Page 3 of 4

2) Plan for determining the extent of potential soil contamination:

- Describe method/technique for determining the presence of contamination in the excavation and native soil;
- Identify the number, depth, and location of proposed sampling points;
- Describe for which contaminants samples will be analyzed and test methods to be used. (Refer to the attached Table 2, June 2, 1988 RWQCB document);
- Provide the name and state certification number of the laboratory contracted for sample analyses;
- Discuss sample transport and packaging protocol.

3) Submittal of final report. The final report shall include:

- Chain-of-custody forms for samples transported to laboratory;
- Original signed laboratory reports;
- Summary of laboratory reports;
- Copies of waste manifest used for the transport of UST;
- Discussion of findings and any recommended further action.

Parts 2 and 3, above, will require that you retain under contract a consultant capable, and licensed, to perform site investigations of this sort. If soil borings are determined to be an appropriate sampling method, permits will need to be issued by Zone 7 before such work may begin. Please be advised that before implementing any sampling activity, your proposed plans must be reviewed by this office.

Please submit your sampling proposal and remit the closure permit, penalty, and state surcharge fees totalling \$999.00 within 30 days of receipt of this letter. Checks should be made payable to Alameda County. Please issue two separate drafts: one draft for \$333.00 and the other for \$666.00.

Shell Station
3495 Castro Valley Blvd.
Castro Valley
February 24, 1989
Page 4 of 4

You may contact Scott Seery, Hazardous Materials Specialist, at
415/271-4320 should you have any questions.

Sincerely,

Rafat A. Shahid
Rafat A. Shahid, Chief
Hazardous Hazardous Division

RAS:mam

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Bob Bohman, Castro Valley Fire Department
Scott Seery, Alameda County Department of Environmental Health,
Hazardous Materials Division
Files

Enclosure

March 21, 1989

ALAMEDA COUNTY HEALTH CARE SERVICES
Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

Attention: Scott Seery
Re: *Shell Station*
3495 Castro Valley Blvd.
Castro Valley

Dear Mr. Seery,

We are in receipt of the Department's letter signed by Rafat A. Shahid, regarding the above location.

There is definitely a disparity in the way I recall the conversation with Mr. Seto and his recollection. I was not told at anytime by Mr. Seto to "cease and desist". It was my understanding from our conversation, that as long as the removal of the tank was O.K.'d by the Castro Valley Fire Marshall, we could proceed. When I relayed this conversation to Mr. Bohman, he requested that he be present when the tank was tested for fumes and removed. He also advised that the tank should be packed with dry ice. (This was handled by H and H Ship Service.)

We in good faith proceeded in this fashion -- had we been aware that we were not to proceed, we certainly would not have gone forward in ridding the station of the tank. Everyone involved appeared anxious, however, to have the waste oil tank removed from the site.

Regretfully, we were misinformed and apparently we misterpreted what was expected of us. Our removal of the waste oil tank was not done in defiance of any regulations, but was accomplished, however, in full view of any agency that cared to monitor us.

We have enclosed our two checks totaling \$999, to cover closure fees and penalties. We have also enclosed a handwritten note, left at the station by Mr. Seto. From the tone of his note it does not appear that there was an urgency in returning the forms.

We apologize for our failure in not following proper procedure. We shall, as soon as possible, resolve the items in #2 and 3 of the Department letter.

Very truly yours,

Carol Simas
Carol Simas

ALAMEDA COUNTY
DEPT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS
3/22/89

Enclosures 3

Xtra

OIL COMPANY

2200 DURANT AVE.

BERKELEY, CA 94704

(415) 548-0330

Feb. 3, 1988

2/4/88

ALAMEDA COUNTY
DEPT. OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS

Dept. of Environmental Health
80 Swan Way - Rm #200
Oakland, Ca 94621

Attention: Lawrence Seto

Re: 3495 Castro Valley Blvd.
Castro Valley

Dear Mr. Seto,

We will be moving from our present office soon and in sorting through my files in preparation for this move, I came across copies of the attached. I'm fairly certain they were sent to you in early December, however, I'm not positive. If they were overlooked, please check to see that all is in order.

Thank you,

Carole Somas

Enclosures

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
80 SWAN WAY, ROOM 200
OAKLAND, CA 94621
PHONE NO. 415/271-4320

2/6/87
ALAMEDA COUNTY
DEPT. OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS

Submitted after the
fact; never approved.
As submitted, this
plan is very incom-
plete
2-6-87 S.O.S.

UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

1. Business Name XTRA OIL CO.
Business Owner EDWARD T. & CAROL L. SIMIAS
2. Site Address 3495 CASTRO VALLEY BLVD.
City CASTRO VALLEY CA Zip 94546 Phone 537-7045
3. Mailing Address 2200 DURANT AVE
City BERKELEY CA Zip 94704 Phone 548-6330
4. Land Owner EDWARD T. SIMIAS
Address 6590 CROW CANYON RD City, State CASTRO VALLEY CA Zip 94546
5. EPA I.D. No. _____
6. Contractor SELF (XTRA OIL CO)
Address 2200 DURANT AVE
City BERKELEY CA Zip 94704 Phone 548-0330
License Type _____ ID# _____
7. Consultant NONE
Address _____
City _____ Phone _____

8. Contact Person for Investigation

Name EDWARD T. SIMAS Title OWNER
Phone 548-0330 (OFF)
548-4506 (HOM)

9. Total No. of Tanks at facility 4 + 1 WASTE OIL

10. Have permit applications for all tanks been submitted to this office? Yes [] No []

ALL BUT WASTE OIL - WE WERE NOT AWARE OF ITS EXISTENCE UNTIL RECENTLY - XTRA OIL CO. HAS NEVER USED IT.

11. State Registered Hazardous Waste Transporters/Facilities

a) Product/Waste Tranporter

Name H & H SHIP SERVICE CO. EPA I.D. No. _____
Address 220 CHINA BASIN
City SAN FRANCISCO State CA Zip 94124

b) Rinsate Transporter

Name _____ EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

c) Tank Transporter

Name H & H SHIP SERVICE CO. EPA I.D. No. _____
Address 220 CHINA BASIN
City SAN FRANCISCO State CA Zip 94124

d) Tank Disposal Site

Name H & H SHIP SERVICE CO. EPA I.D. No. _____
Address 220 CHINA BASIN
City SAN FRANCISCO State CA Zip 94124

e) Contaminated Soil Transporter UNKNOWN

Name _____ EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

12. Sample Collector UNKNOWN

Name _____

Company _____

Address _____

City _____ State _____ Zip _____ Phone _____

13. Sampling Information for each tank or area

Tank or Area		Material sampled	Location & Depth
Capacity	Historic Contents (past 5 years)		
	<u>NOT USED</u> IT HAD BEEN USED AS A WASTE OIL TANK PRIOR TO OUR OCCUPANCY		

14. Have tanks or pipes leaked in the past? Yes [] No [X]

If yes, describe. _____

15. NFPA methods used for rendering tank inert? Yes [X] No []

If yes, describe. DRY ICE

An explosion proof combustible gas meter shall be used to verify tank inertness.

16. Laboratories

Name _____

Address _____

City _____ State _____ Zip _____

State Certification No. _____

17. Chemical Methods to be used for Analyzing Samples

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Number
UNKNOWN		

18. Submit Site Safety Plan

19. Workman's Compensation: Yes No

Copy of Certificate enclosed? Yes No

Name of Insurer CNA

20. Plot Plan submitted? Yes No

21. Deposit enclosed? Yes No

22. Please forward to this office the following information within 60 days after receipt of sample results.

- a) Chain of Custody Sheets
- b) Original Signed Laboratory Reports
- c) TSD to Generator copies of wastes shipped and received
- d) Attachment A summarizing laboratory results

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true. I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel and safety.

I will notify the Department of Environmental Health at least two (2) working days (48 hours) after approval of this closure plan in advance to schedule any required inspections. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

Signature of Contractor

Name (please type) _____

Signature _____

Date _____

Signature of Site Owner or Operator

Name (please type) CAROL L SIMAS

Signature *Carol L Simas*

Date 11/2/88

Please print or type. (Form designed for use on elite typewriter).

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. **CA1C10010112719099118215**
Manifest Document No. **15**

2. Page 1 of 1
Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address
**XTRA OIL CO.
2200 DURANT AVE. BERKELEY 94704**

A. State Manifest Document Number
87891825

4. Generator's Phone **(415) 541-0330**

B. State Generator's ID

5. Transporter 1 Company Name
HEH SHIP SERVICE CO. INC. CAD 004771168

C. State Transporter's ID
907465

6. US EPA ID Number
004771168

D. Transporter's Phone
(415) 543-8335

7. Transporter 2 Company Name

E. State Transporter's ID

8. US EPA ID Number

F. Transporter's Phone

9. Designated Facility Name and Site Address
**HEH SHIP SERVICE CO. INC.
220 CHINA BASIN STREET
SAN FRANCISCO CA 94107**

G. State Facility's ID
38-1001-98

10. US EPA ID Number
004771168

H. Facility's Phone
(415) 543-0906

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers		13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
	No.	Type			
a. HAZ WASTE, METAL, WASTE OIL NOS. CALIFORNIA REGULATED WASTE	0101	TIP	1101010	GK	State 512 EPA/Other NA
b.					State 512 EPA/Other
c.					State EPA/Other
d.					State EPA/Other

J. Additional Descriptions for Materials Listed Above
**1,000 Gallon underground waste
oil tank w/ approx 50 gallons
sludge remaining.**

K. Handling Codes for Wastes Listed Above
a. **01**
b.
c.
d.

15. Special Handling Instructions and Additional Information
Wear protective gear as required.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name **CAROL SIMAS** Signature *Carol Simas* Month Day Year **11 10 78**

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name **SIDNEY W FOSTER** Signature *Sidney W Foster* Month Day Year **11 10 78**

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name Signature Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name **Cleodora Valley** Signature *Cleodora Valley* Month Day Year **11 10 78**

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

GENERATOR TRANSPORTER FACILITY