

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



3057
06-01-06

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 No. RO0000285, Extra 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 MIBE 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
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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

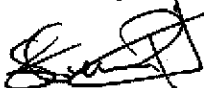
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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

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

Donna Drogos, ACEH
Steven Plunkett, ACEH
File

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
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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
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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.

Mr. Simas
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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
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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.

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TECHINCAL 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
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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



10-28-02

October 25, 2002

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

RO 285

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

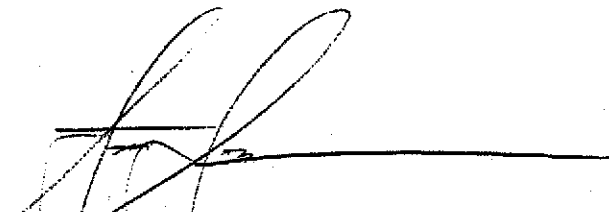
Dear Mr. Simas:

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



04-09-01

R0285

April 6, 2001

ENVIRONMENTAL HEALTH SERVICES

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

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 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,

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



02-08-01

Ro285

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:

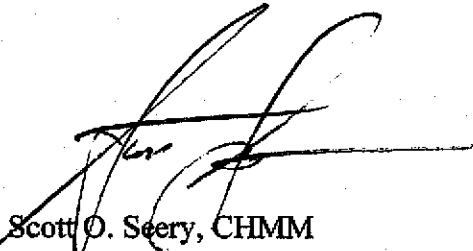
- Boring placement to be concentrated within the commercial property south of the subject site and immediately north of the residential properties along Redwood Court
- Perform continuous soil coring and logging
- Selected soil samples to be analyzed for TPH-G, -D, BTEX and any other parameters deemed 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", with a large, sweeping flourish extending to the right.

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



10-6-00

RO#285

October 4, 2000

STID 3747

Ted 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: Inspection of Xtra Oil Company dba Shell Station, 3495 Castro Valley Blvd., Castro Valley

Dear Mr. Simas:

A regulatory compliance inspection was performed at the subject facility on September 28, 2000. A representative of Central Petroleum 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:

- Several inches of standing product was accumulated within the Bravo containment below dispenser # 7 / 8; none of the shear valves were triggered, as connector chains and float linkage mounting brackets for float trip mechanisms were too loose
- Product filled one or more float trip mechanism amplifier wells within the Bravo dispenser containment below dispensers # 1 / 2 and 3 / 4; in each case, none of the shear valves were triggered, as connector chains and float linkage mounting brackets for float trip mechanisms were too loose
- In general, chains connecting float trip mechanisms to shear valves and linkage mounting brackets within each Bravo containment box were too loose to trigger shear valves in the event of a release
- Leak detector sensor was located on the wrong side of the STP sump of the 87 product tank
- Debris and dirt were accumulated in the overflow buckets of the each product tank
- Drain valves for both vapor and fill overflow buckets were broken on 87 product tank
- Gasket for the 87 product fill riser lid was damaged
- Surface gaskets of many of the steel access covers were damaged or missing
- Hold-down bolts of many of the steel access covers were missing, stripped, or broken
- Annual product piping test records for year 1999 were not available

Mr. Simas
Re: 3495 Castro Valley Blvd., Castro Valley
October 4, 2000
Page 2 of 4

- Annual tank monitoring equipment test and certification records for year 1999 were not available
- Employee training records did not specify training topics

Three of five Bravo dispenser containment boxes showed evidence of product releases. Product was present in the float trip mechanism amplifier wells; the bottom of one dispenser box (#7 / 8) was completely filled with product. Although the floats were buoyed by the accumulated product, none of the shear valves were triggered. The chains connecting the float trip mechanisms and attached float linkage brackets were all too loose to trigger the shear valves.

Loose float trip mechanism chains were also identified during the April 1998 and September 1996 inspections of the facility. This problem appears to be a recurring theme, and renders this component of your UST monitoring program out of compliance with the conditions of your permit.

As you are aware, the Gilbarco TM3 monitoring panel allows for the print-out of an "alarm history" of the tank monitoring system. Only the three most recent alarm events for each of the 8 channels are so printed. An alarm history report was printed during the 9/28/00 inspection. Review of this report reveals that many of the wet annulus sensors do not appear on the print-out at times your monitoring system testing contractor, Tanknology, was reportedly at the site to recertify your monitoring system. For example, Tanknology reportedly performed annual tests on 4/13/00, yet only the STP sump sensors (channels 1 - 4) appear on the alarm history report for that date. Barring a software problem with the Gilbarco panel, this appears to demonstrate that the annulus probes were not inspected and tested in the normal and expected fashion. Should you have a possible explanation for this apparent anomaly, please present it.

Several violations of provisions of HSC have been identified, as follows:

- HSC Sec. 25293 - The operator of the underground tank system shall monitor the tank system using the method specified on the permit for the tank system. Records of monitoring.....shall be kept in sufficient detail to enable the local agency to determine whether the underground tank system is in compliance with the applicable provisions of [HSC Chapter 6.7], the regulations....., and the permit issued for the operation of the tank system.

Loose chains and brackets on the Bravo containment float trip mechanisms rendered the dispensers unmonitored for an unknown period of time. This item violates a condition of your permit to operate the tank system at this site.

- HSC Sec. 25294 - Any unauthorized release from the primary containment which the operator is able to cleanup within 8 hours after the release was detected *or should reasonably have been detected*, and which does not escape from the secondary containment.....shall be recorded on the operator's monitoring reports.

Mr. Simas
Re: 3495 Castro Valley Blvd., Castro Valley
October 4, 2000
Page 3 of 4

Releases into the Bravo dispenser containment were neither cleaned up nor (apparently) recorded.

- HSC Sec. 25294(a)(1) – Any unauthorized release... [that] increases the hazard or fire or explosion... shall be reported by the operator to the local agency ... within 24 hours after the release had been detected *or should have been detected*. A full written report shall be transmitted to the local agency within 5 days.

Product releases into the Bravo dispenser containment were neither cleaned up nor reported.

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:

- (2) Violation of any applicable requirement of the permit
- (3) Failure to maintain records
- (4) Failure to report an unauthorized release
- (6) Violation of any applicable requirements of HSC Chapter 6.7
- (7) Failure to perform any monitoring, testing, and reporting

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:

- (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
- (6) Violation of any applicable requirements of HSC Chapter 6.7
- (7) Failure to perform any monitoring, testing, and reporting

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

- Submit a copy of the 1999 monitoring system and product piping annual tests and certifications
- Complete and submit the attached set of updated UST Registration Forms
- Correct the operation and maintenance problems identified during the 9/28/00 inspection and as articulated in this report

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. We will expect that accompanying this Plan will be the updated UST Registration Forms and other requested records or reports.

Mr. Simas
Re: 3495 Castro Valley Blvd., Castro Valley
October 4, 2000
Page 4 of 4

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, as, pursuant to HSC Sec. 25285(b), this agency cannot issue or renew the UST permit until we determine the UST system is in full compliance. We recommend, therefore, that you contract your own inspector to ensure that this requirement is met, and to provide the appropriate level of quality control that you will likely need to make this certification.

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

Attachments (addressee, only) - 9 pages

cc: Mike O'Connor, Alameda County District Attorney's Office
Tom Peacock, ACDEH
Robert Weston, ACDEH

SENT 7-13-2000

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

20285

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



SENT mail cc's
4-27-2000

R0285

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION (LC)
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.

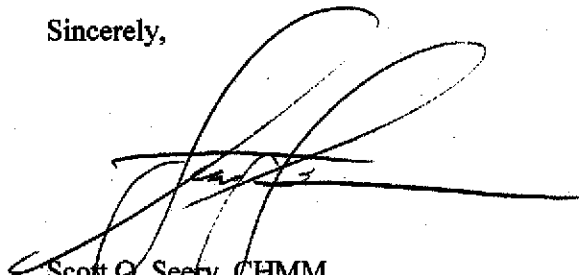
Mr. Simas
Re: 3495 Castro Valley Blvd., Castro Valley
April 26, 2000
Page 2 of 2

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 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

Sent 12/3/99
Including cc's

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

20285

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

SENT 10-19-99
including cc's

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

P0285

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



R0285

September 10, 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: 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.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0# 285

STID 3747

March 25, 1999

Forrest Riley
3250 Concord Avenue
Brentwood, CA 94513

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. 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 P28, 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:

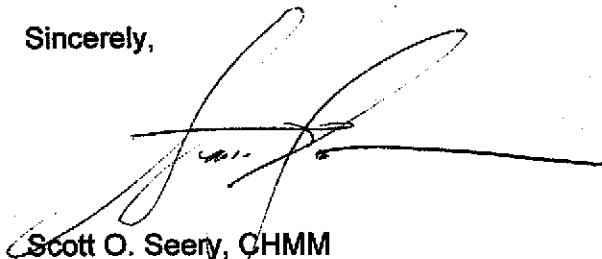
- a) collect samples above or beneath the land,
- b) set up and maintain monitoring equipment for the purpose of assessing or measuring the migration of pollutants on, beneath, or toward the land

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0# 285

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.

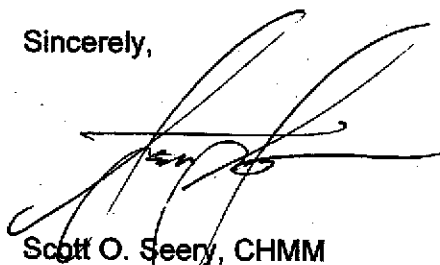
We encourage you to allow access to the RP in order to facilitate the completion of this investigation. Disruption to the site will be minimal and temporary, and the work will be performed at no cost to you. This office is willing to provide you whatever technical information you should need to become 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". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

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

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0#285

January 22, 1998

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
810-567-6700
FAX: 810-337-9335

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.

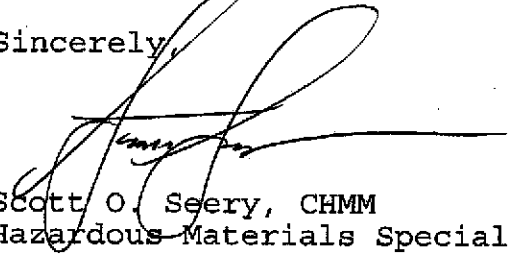
This modifies the proposed plan which called for such wells to be constructed within a proximal Redwood Road medium strip. This change will afford *direct* evidence, rather than indirect, whether the sewer trench is inundated during periods of high ground water, and, hence, providing a conduit for contaminant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

RO 285

November 24, 1997

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

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

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

Dear Mr. Simas:

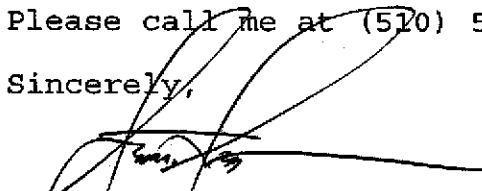
Thank you for meeting with me on November 21, along with your consultant, Mr. Paul King, P & D Environmental, regarding the remaining tasks associated with completion of the risk-based corrective action (RBCA) evaluation for this site. As you will recall, we discussed the need for:

- 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

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO#285

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

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

20285

Alameda County CC4580
Environmental Protection Services
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0285

RAFAT A. SHAHID, Assistant Agency Director

STID 3747

September 15, 1994

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

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

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.



R0285

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

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0285

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.

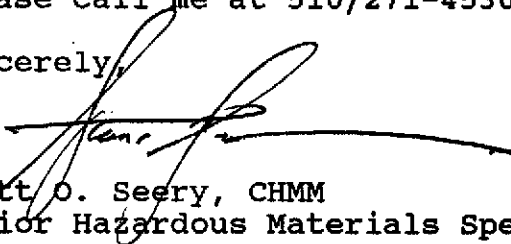
Further, interim remediation measures are warranted and must be implemented at this time to retard the rate at which contaminants, particularly immiscible phase (IP) hydrocarbons, migrate away from your site. The timely removal of such IP hydrocarbons is a minimum objective, and must be implemented *immediately*. 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,

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

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

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0285

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.

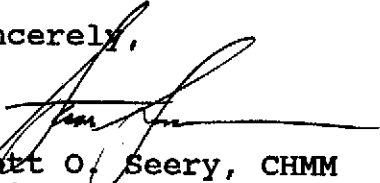
Mr. Ted Simas
RE: 3495 Castro Valley Boulevard
January 7, 1994
Page 2 of 2

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

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0285

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 Hiatt, 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

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0285

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 Hiatt, RWQCB
Bob Bohman, Castro Valley Fire Department
Paul King, P & D Environmental
Ed Howell - files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0285

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.

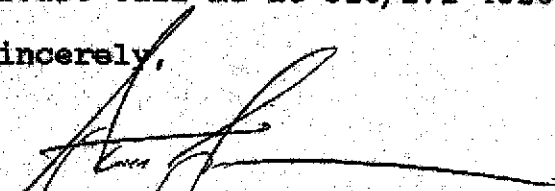
As we further discussed, the lateral extent of ground water and soil contamination extending from the site still has not been defined. Hence, the magnitude of the problem is unknown. This must be determined through the installation of additional monitoring wells. Further, the effectiveness of the any 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 SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Page 5

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. Rip 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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0285

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.

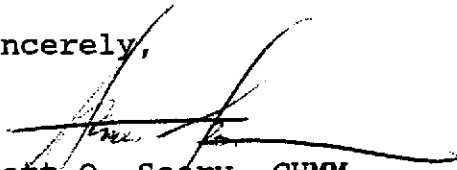
The Department, as well as the RWQCB, is adamant that additional work proceed, but in a fashion consistent with the laws, regulations, and policy controlling such work. We agree that the geophysical techniques proposed may significantly increase the chances of siting well-located monitoring wells. However, 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 *TS*

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0285

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



R0285

December 27, 1990

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

Mr. Ralph Johnson
Alameda County Public Works Agency
399 Elmhurst Street
Hayward, CA 94544

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0285

December 27, 1990

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

Mr. John Fenstermacher
Alameda County Public Works Agency
399 Elmhurst Street
Hayward, CA 94544

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

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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



R0285

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:

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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



R0285

December 27, 1990

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

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

Dear Mr. Simas:

As we discussed this afternoon, this Department has scheduled a meeting in this office for January 17, 1991 to discuss issues impacting the ongoing environmental investigation and remediation, planned station remodeling, and acquisition of a portion of the referenced property during the Redwood Road widening project sponsored by the Alameda County Public Works Agency. Representatives from this agency, as well as from the County Public Works Agency and Planning Department, have been invited to attend. Please have your environmental consultant and other pertinent representatives join you at this meeting.

As the environmental investigation will be a major topic of discussion, your consultant should be prepared to provide an overview of the investigation to date, present viable options for assessing the impact to affected properties off-site, discuss potential options for remediating contaminated soil and ground water, and present a rough time frame for the implementation of these activities.

The meeting will convene promptly at 10:00 AM in our office, 80 Swan Way, Room 200, Oakland. Please call me at 415/271-4320 should you have any questions.

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
Howard Hatayama, DHS
Lester Feldman, RWQCB
John Cussen, California Geophysical Group, Inc.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0285

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).

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



R0285

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
3495

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.

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0285

December 13, 1989

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

(4)

Ms. Lois Yee
Environmental Science Associates, Inc.
760 Harrison Street
San Francisco, CA 94107-1235

RE: Environmental Assessment for Alameda County Public Works
Project: Redwood Road/A Street Improvements

Dear Ms. Yee:

We are in receipt of your letter dated December 5, 1989 requesting information from our files regarding underground storage tanks, leaks and hazardous materials associated with facilities along the route of the planned roadway expansion. A summary of this information is provided below, in the order in which these sites were listed in the referenced December 5 correspondence:

(R0285) 1. Xtra Oil Company dba Shell Oil Company,
3495 Castro Valley Blvd.

Underground Tanks: currently four (4); one 1,000 gallon waste oil tank was removed in 1988

Year Installed: 1967

Material/type: steel, single-wall

Capacities/Contents: 10,000 gallon each; gasoline (3), diesel (1)

Last tested: August 30, 1989, all remaining tanks tested "tight"

Leaks: Waste oil tank removed sometime during 3rd or 4th quarter of 1988 (not under proper permit). Sampling did not occur following closure. Aqua Science Engineers, Inc., reexcavated the waste oil pit and collected one (1) soil sample for laboratory analysis on May 5, 1989. This sample was analyzed for TPH-D, TOG, and volatile organics.

Ms. Lois Yee
 Environmental Science Associates, Inc.
 760 Harrison Street
 San Francisco, CA 94107-1235
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Results indicate 980 and 426 ppm of TPH-D and TOG, respectively. Further, toluene, ethylbenzene and xylenes were detected at 12, 18 and 266 ppb, respectively. No benzene was found in the analyzed soil sample.

A groundwater investigation is pending.

(R0346) 2. BP Station #11105 (formerly Mobil Oil Co.)
 3519 Castro Valley Blvd.

Underground Tanks: currently four (4); 380 waste oil tank removed in September, 1988

Year Installed: 1984 (1986?); new waste oil tank installed 4th quarter of 1988

Materials/type: fiberglass, single-wall; fiberglass, double-wall (waste oil)

Capacities/Contents: 1,000 gallons, (waste oil); 6,000, 8,000, 10,000 gallons (gasoline)

Last tested: Sept. 22, 1988 (fuel); Oct. 5, 1988 (waste oil)

Leaks: Nine (9) holes were noted in steel 380 gallon waste oil tank removed on September 20, 1988. A Kaprealian Engineering, Inc. report dated October 17, 1988 indicates samples collected from beneath the tank and

Ms. Lois Yee
 Environmental Science Associates, Inc.
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 San Francisco, CA 94107-1235
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from stockpiled soils were analyzed for TPH-D, TOG, BTEX and chlorinated hydrocarbons. Samples from beneath the tank indicate nondetectable levels of TOG and TPH-D. Benzene and toluene were detected at 6.8 and 9.5 ppb, respectively. One composite sample from stockpiled material previously excavated from the tank pit had 100 ppm TOG.

No further work has been required nor performed at this site.

3. Possible ex-Shell Oil Company Station
 22222 Redwood Road

- no file on record

- (R0275) 4. Former Chevron Station #902960
 2416 Grove Way

Underground tanks: none currently; three (3) fuel and one (1) waste oil tanks removed
 June 19, 1986

Year installed: unk

Material/type: unk

Capacities/Content: 550 gallon (waste oil); 2,000 and 7,500 gallon (gasoline)

Last tested: unk

Leaks: Tanks removed and soil samples

Ms. Lois Yee
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collected June 19, 1986. Samples collected by Blaine Tech Services, Inc. from fuel tank pit as high as 14,000 ppm (1.4%) TPH-G, as reported July 10, 1986. No analysis for BTEX performed at this time. TOG analysis of soil samples collected from beneath waste oil tank N.D.; no volatile or chlorinated hydrocarbons, nor TPH-G or -D analysis performed. Subsequent reports by Blaine Tech Services dated August 5 (2) and Sept. 9 and 11, 1986 document composite sample analysis before, during and after on-site aeration of stockpiled soils previously excavated from tank pits. A report dated August 21, 1986 documents analysis of sidewall sampling following limited reexcavation laterally to the west in the NW corner of the fuel tank pit on August 8, 1986. Latent contamination is reported to be as high as 170 ppm TPH-G where sampled. Excavation vertically appears to have terminated at approximately 23 feet below grade (BG).

A report by Emcon Associates, dated Nov. 4, 1986 documents the installation October 1, 1986 of four (4) on-site groundwater monitoring wells to a total depth of 30.5 feet. Groundwater was first encountered at approximately 17 feet BG. Strong product odor was detected in drilling spoils from two (2) borings (C-1 and C-3) in the interval between 9 to 20.5 feet BG.

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On October 9, 1986 Gettler-Ryan, Inc. field checked for water level and presence of floating product; no floating product was detected in any wells but strong product odor was evident in well C-1 installed within the former fuel tank pit. Water samples were collected for laboratory analysis on October 23, 1989 and analyzed for TPH-G and BTX. All wells showed evidence of dissolved hydrocarbons, with well C-1 having benzene, toluene, xylenes and TPH-G concentrations of 6.4, 3.7, 4.3 and 37 ppm, respectively.

EA Engineering, Science and Technology, Inc. submitted to Chevron, under cover dated November 11, 1987, a "Report of Investigation and Risk Assessment". EA's work was performed to direct next appropriate actions at the site. On September 10, 1987, EA sampled the four (4) existing monitoring wells. Laboratory analyses report levels of dissolved benzene, toluene, xylenes, ethylbenzene, and TPH-G as high as 25, 60, 79, 13, and 120 ppm, respectively, in water sampled from "MW-1" (C-1), an increase in dissolved hydrocarbon concentrations of approximately one order-of-magnitude. Wells "MW-2" (C-2) through "MW-4" (C-4) showed slight-to-moderate increases or decreases in concentrations of BTX and TPH-G. Ethylbenzene concentrations are not compa-

Ms. Lois Yee
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rable to previous analyses because the presence of this analyte was not discussed in past reports. No depth to groundwater data was reported. EA concludes that the existing contamination poses no risk to human health or the environment and recommends no further action except continued annual sampling and analyses of water from the on-site monitoring wells.

A Gettler-Ryan summary dated September 27, 1988 reports monthly monitoring data between March 6, 1987 through August 26, 1988. Floating product was detected during nine of the sixteen monitoring episodes occurring during this period of time in well C-1, including the last episode, August 26, 1988, during which 0.85 feet of product was noted. Floating product was found in each of the remaining three (3) wells at some point during this stretch of monthly sampling. No further sampling has been reported nor performed since August, 1988.

During site regrading (date?) by new property owners, the wells were inadvertently covered, as reported October 9, 1989 by Chevron. Gettler-Ryan was recently successful in locating and uncovering the wells. It is reported by Chevron that quarterly sampling of these wells and reporting by Gettler-Ryan will now resume.

Ms. Lois Yee
Environmental Science Associates, Inc.
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December 13, 1989
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(R0355) 5. Former Beacon Station #0574
22315 Redwood Road

Underground Tanks: none currently; four (4) fuel and one (1) waste oil tanks removed
May 5, 1987

Year installed: 1966 (?)

Material/type: steel, single-walled

Capacities/Contents: 500 gallons (waste oil); 5,000 (2) gallons (diesel); 7,500 and 8,000 gallons (gasoline)

Last tested: July 14, 1986; all tanks tested "tight" following minor repair to vapor recovery system of premium unleaded tanks

Leaks: Relatively high levels of hydrocarbons detection in soils following tank closures on May 5, 1987. An Applied GeoSystems report dated June 25, 1987 documents initial soil sample analysis results which identify initial TPH-G and TPH-D concentrations as high as 3264 and 2898 ppm, respectively. Benzene, toluene, xylenes and ethylbenzene was found to be as high as 89, 90, 248 and 559 ppm, respectively. Fairly low levels of TPH-G, TPH-D and BTEX were detected in the waste oil excavation. Applied GeoSystems returned to the site on May 18, 1987.

Ms. Lois Yee
Environmental Science Associates, Inc.
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to oversee over excavation of the fuel tank pit. A geologist from this firm observed that contamination was not confined to the tank pit, but had migrated laterally towards the north and eastern ends of the excavation. Vertical excavation ceased at approximately 20 feet BG. Latent contamination remaining in certain areas of the pit were reported as high as 1989 and 1192 ppm as TPH-G and TPH-D, respectively. Recommendations made to Beacon at this time were to proceed with a groundwater investigation.

No further work has been done at this site. No monitoring wells are known to currently exist on or off-site.

A request was recently issued from this department for the submittal of a site assessment proposal to address contamination underlying this site. Submittal is pending.

6. Don Williams and Son Auto Repair
Corner of 6th and Knox Streets

- no file on record -

7. Keith's Transmission
22312 Redwood Road

Underground Tanks: one (1)

Ms. Lois Yee
Environmental Science Associates, Inc.
760 Harrison Street
San Francisco, CA 94107-1235
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Year installed: 1981
Material/Type: steel, single-walled
Capacities/Contents: 1,000 gallon, waste oil
Last tested: pending; first test scheduled for
week for December 17, 1989
Leaks: unk

Other materials handled: transmission oil (new and used),
petroleum based solvents, parts
washer liquid and sludge.

8a. Manor Cleaners
20857 Redwood Road

Underground tanks: NA
Leaks/discharges: unk
Materials handled: perchloroethylene; (presumed)
detergents, bleach, spotting liquids,
other solvents, waste still oil and
filters

8b. Mirande One-Hour Cleaners
21120 Redwood Road

Underground Tanks: NA
Leaks/Discharges: unk

Ms. Lois Yee
Environmental Science Associates, Inc.
760 Harrison Street
San Francisco, CA 94107-1235
December 13, 1989
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Materials handled: perchloroethylene, waste still oil and
filters; (presumed) detergents,
bleach, spotting liquids, other
solvents

This summary is limited to information available to this office and does not include any information available to other agencies or businesses which may be involved with these properties.

Please also find enclosed a copy of the invoice sent to our Billing Unit.

Should you have any further questions, please contact the undersigned at (415) 271-4320.

Sincerely,



Scott Seery
Hazardous Materials Specialist

SOS:mnc

Enclosure (1)

cc: Robert Hale, Alameda County Public Works
Rafat A. Shahid, Assistant Agency Director, Environmental Health
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SITE: 3495 Castro Valley Blvd.

R0285

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

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0285

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, ³⁴⁹⁵~~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,

R.A.S.J.
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 Way, Room 200
Oakland, CA 94621

R0285

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

RECOMMENDED MINIMUM VERIFICATION ANALYSES FOR
 UNDERGROUND TANK LEAKS

<u>HYDROCARBON LEAK</u>	<u>SOIL ANALYSIS</u>		<u>WATER ANALYSIS</u>	
<u>Unknown Fuel</u>	TPH G TPH D BTX&E	GCFID(5030) GCFID(3550) 8020 or 8240	TPH G TPH D BTX&E	GCFID(5030) GCFID(3510) 602 or 624
<u>Leaded Gas</u>	TPH G BTX&E ---Optional--- TEL EDB	GCFID(5030) 8020 or 8240 DHS-LUFT DHS-AB1803	TPH G BTX&E TEL EDB	GCFID(5030) 602 or 624 DHS-LUFT DHS-AB1803
<u>Unleaded Gas</u>	TPH G BTX&E	GCFID(5030) 8020 or 8240	TPH G BTX&E	GCFID(5030) 602 or 624
<u>Diesel</u>	TPH D BTX&E	GCFID(3550) 8020 or 8240	TPH D BTX&E	GCFID(3510) 602 or 624
<u>Jet Fuel</u>	TPH D BTX&E	GCFID(3550) 8020 or 8240	TPH D BTX&E	GCFID(3510) 602 or 624
<u>Kerosene</u>	TPH D BTX&E	GCFID(3550) 8020 or 8240	TPH D BTX&E	GCFID(3510) 602 or 624
<u>Fuel Oil</u>	TPH D BTX&E	GCFID (3550) 8020 or 8240	TPH D BTX&E	GCFID(3510) 602 or 624
<u>Chlorinated Solvents</u>	CL HC BTX&E	8010 or 8240 8020 or 8240	CL HC BTX&E	601 or 624 602 or 624
<u>Non Chlorinated Solvents</u>	TPH D BTX&E	GCFID(3550) 8020 or 8240	TPH D BTX&E	GCFID(3510) 602 or 624
<u>Waste Oil or Unknown</u>	TPH G TPH D O & G BTX&E CL HC	GCFID(5030) GCFID(3550) 503D&E 8020 or 8240 8010 or 8240	TPH G TPH D O & G BTX&E CL HC	GCFID(5030) GCFID(3510) 503A&E 602 or 624 601 or 624

---If any of the above detected, include:---

ICAP or AA TO DETECT METALS: Cd, Cr, Pb, Zn
 METHOD 8270 FOR SOIL OR WATER TO DETECT:
 PCB
 PCP
 PNA
 CREOSOTE