

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

Ro#295

March 9, 1998

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

Mr. Randy Nahas  
R.T. Nahas Company  
20630 Patio Drive  
Castro Valley, CA 94546

RE: (FORMER) TIEN'S UNOCAL, 20405 REDWOOD ROAD, CASTRO VALLEY

Dear Mr Nahas:

I have completed a review of the case file for the subject site which encompassed, among others, the following entries:

- o *Addendum to Revised Corrective Action Plan - January 20, 1998, BSK & Associates*
- o *Revised Corrective Action Plan - June 14, 1996, Philip Environmental Services*
- o *Source Removal Work Plan - February 12, 1996, Philip Environmental Services*
- o *Feasibility Study - December 11, 1995, BSK & Associates*

The June 14, 1996 Philip Environmental Services ("Philip") revised corrective action plan (RCAP) proposes completion of certain tasks intended to facilitate restoration of this site to a condition necessary to foster commercial redevelopment. The scope of proposed remedial activities are substantially based on the reported completion of a Tier 2 risk-based corrective action (RBCA) evaluation. It is also reported that the Groundwater Services, Inc. Tier 2 RBCA Tool Kit software was used in calculating site-specific target levels (SSTL) employing select site specific input parameters. Exposure pathways evaluated were: 1) vapor intrusion from soil and ground water into commercial buildings, and 2) volatilization from both media to outdoor air.

Calculated SSTLs are presented. It is unclear, however, which exposure pathways each SSTL value represents (e.g., vapor flux to indoor air vs. outdoor air), as none of the calculations or worksheets used to derive SSTLs are provided in the report. It is unknown which potential receptor populations (i.e., on- or off-site) were reflected in calculating SSTLs. Cumulative risks are not shown. Absent data clarification, the presented SSTLs can not be used as a means of establishing soil remediation goals during excavation of the UST pit and surrounding area.

Mr. Nahas  
RE: 20405 Redwood Road, Castro Valley  
March 9, 1998  
Page 2 of 3

Soil remediation goals referenced in the January 28, 1998 BSK & Associates (BSK) addendum are based on the Philip SSTLs. As it currently stands, the Philip SSTLs can not be used for establishing cleanup goals for this site. Consistent with current State and Regional Water Board policy, however, and as a minimum remediation goal, soil which may prove a future source of substantial ground water degradation, or appears to present an increased exposure risk, is to be excavated during UST post-closure activities *where doing so may be accomplished in a cost-effective manner*. Consistent with this approach, such would entail removal of soils saturated with gasoline, at a minimum.

We anticipate the scope of overexcavation, therefore, to be limited to those areas immediately surrounding the UST pit, the dispenser pads, and along the vent and product pipeline trenches. We do not anticipate, however, the need to remove substantial volumes of clean overburden in order to "chase" or excavate contaminated soils within the capillary zone. It does not appear appropriate, therefore, to excavate a "test pit" in the area of boring SP-1 as proposed in the cited Philip document.

The referenced BSK addendum proposes direct measurement of vapor flux into the vadose zone as a means of calculating potential risks to receptors located in off-site commercial structures immediately south of the site. As long as this soil vapor investigation includes the evaluation of potential preferential vapor pathways (i.e., utility trenches), this appears to be a prudent and appropriate course of action at this site. Mitigation or remediation measures may then be evaluated depending on what is revealed.

Future on-site receptor populations may be provided an additional layer of protection (after excavation of gasoline-saturated soil) by implementing mitigation measures during redevelopment of the site. The simplest, most cost-effective measure would be to install vapor barriers below slab-on-grade foundations during construction. Vapor barriers would effectively preclude entry of hydrocarbon vapors into the new structures.

Post remediation monitoring is appropriate. Final new well locations, if any, can be determined after UST closures and soil excavation have been completed. It appears appropriate to abandon wells MW-2, -3, -4, and -101 in preparation for and contemporaneous with UST closures and soil excavation. However, only the abandonment of well MW-4 may require overdrilling/grouting. Because of their proximity to areas anticipated for overexcavation, it appears the remaining wells may be "abandoned" by removal during the excavation phase.

Mr. Nahas  
RE: 20405 Redwood Road, Castro Valley  
March 9, 1998  
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The post-UST closure and -excavation soil sampling protocol presented in the cited Philip proposal appear appropriate. Methyl-tert butyl ether (MtBE) is to be added, however, to the suite of target compounds for soil samples collected within the fuel UST/dispenser excavation.

Ground water "remediation" which occurs during excavation activities should be limited to removal of accumulations of free-phase product (FP), only. Any FP removed from the excavation and stored or treated on-site will require adherence to applicable flammable liquid storage protocols, including security, setbacks from property lines, and signage, among others. Discharge of any treated ground water will, of course, require permit from the local sewer district.

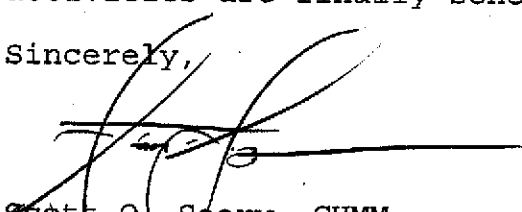
Proposed total BTEX cleanup/screening levels (1.0 ppm) and sampling protocol for excavated soil subject to reuse as backfill material appear reasonable and, hence, acceptable.

We do not anticipate building restrictions for commercial redevelopment of the site should health-protective criteria be applied. This office has successfully coordinated with the Alameda County Building Department on other redevelopment projects located at other former leaking UST sites in the greater Castro Valley area.

Thank you for your patience during this review process. As you are aware, a separate UST closure application must be completed and a permit issued before this work may begin. In addition, a bonafide SVS work plan is to be submitted and approved prior to initiation of this work.

Please notify this office when UST closure and excavation activities are finally scheduled.

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

c: Mee Ling Tung, Director  
Stephen Hill, RWQCB  
Ed Laudani, Alameda County Fire Department  
Robert Weston, ACDEH  
James deGeorgio, SWRCB (UST Fund)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

STIP: 650

Ro 295

September 3, 1996

Randall E. Nahas, Tank Owner  
R.T. Nahas Company  
20638 Patio Drive  
Castro Valley, CA 94546

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

Subject: -Temporary closure of two, motor vehicle fuel, underground storage tanks at 20405 Redwood Road, Castro Valley 94546:  
-Continued operation of one waste oil tank at the same address.

Reference: Your letter of August 27, 1996.

Dear Mr. Nahas:

I have reviewed your letter requesting temporary closure of the two, 10,000 gallon fuel tanks and the corrected state forms A and B for the three tanks. Please contact me as required to comply with the conditions specified below by **September 30, 1996**.

**Conditions for Temporary Closure:**

The two 10,000 gallon gasoline tanks are considered by this office to be under temporary closure for a period of 12 months (from **June 30, 1996 to June 29, 1997**).

You must comply with the requirements for temporary closure as specified in Title 23, section 2671 of the California Code of Regulations. (see enclosure)

Please note the following specific requirements for these two tanks:

- 1- **Prove** to this office that the tanks have been pumped dry of liquid.
- 2- **Notify** this office so we may witness the inerting of the tanks. (Dry ice may be used. **Document** how much is added and when.)
- 3- **Lock** the fill pipe for each tank.
- 4- **Monitor** the tanks by sticking them at least once every three months to detect the presence of any liquid. (Continue to monitor the wells as required by LOP.)
- 5- **Notify** this office prior to putting the tanks back in service.

Note: **-If the temporary closure is 12 months or more, the tanks must be upgraded to 1998 standards or removed.**

[Title 23, Section 2671 (d)]

**Permit for the 300 gallon waste oil tank.**

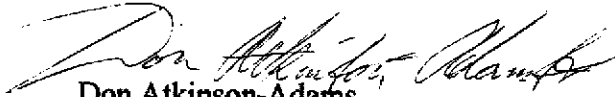
Provide the following documents so I may issue a permit for the waste oil tank: Please note that the previous permit for the three tanks was incorrectly issued to the tank operator instead of to the tank owner. When the paperwork is complete I will reissue the permit for the three tanks with a notation that the two are temporarily closed.

- Owner/Operator agreement.
- Consolidated tank management plan.
- Certification of Financial Responsibility.
- Board of Equalization UST Storage Fee Account Number.  
Call (916)322-9669 to get this number.

I met with the tank operator (Mr. Cave) and instructed him about the monitoring requirements. The tank has not been properly monitored in the past. Because the tank is only 300 gallons it can be monitored by doing weekly manual tank gauging and recording the results. No annual tank tightness test is required as long as the measured amount of oil shows no deviation exceeding the legal limits.

Please call me at 567-6734 if you have any questions.

Sincerely,



Don Atkinson-Adams  
Hazardous Materials Specialist

**Enclosures:**

- section 2671.
- consolidated tank management plan.
- financial responsibility packet.
- notes about owner-operator agreements.

cc: George Cave, Tank Operator  
Sparky International  
20405 Redwood Road  
Castro Valley, CA 94546

Jim Ferdinand, Alameda County Fire Marshall

Bill Reynolds, East Area Manager  
Rob Weston, Senior Hazardous Materials Specialist

ust\permit\nahasumo.996

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO295

RAFAT A. SHAHID, Assistant Agency Director

April 13, 1995

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

STID 650

Mr. Randall Nahas  
R.T. Nahas Company  
20630 Patio Drive  
Castro Valley, CA

RE: TIEN'S UNOCAL, 20405 REDWOOD ROAD, CASTRO VALLEY

Dear Mr. Nahas:

I have completed a review of the case file for this site, up to, and including, the January 31, 1995 BSK & Associates quarterly monitoring report, as submitted under R.T. Nahas cover dated February 1, 1995. The cited report recommends a change in sampling frequency for many of the wells in the well network associated with the investigation at this site.

Although a change in sampling frequency may be warranted for certain of the wells, more importantly, additional actions are required at this stage of the investigation. Pursuant to provisions of Section 2720 et seq. of Article 11, *Corrective Action Requirements*, Title 23, California Code of Regulations (CCR), a corrective action plan (CAP) must be developed for this site. During the development stages of a CAP, several issues must be taken into account, including, among others, the following:

- o assessment of the impacts
- o feasibility study of remedial alternatives
- o applicable cleanup levels
- o characteristics of the contaminant
- o hydrogeology of the site
- o cost-benefit analysis evaluating remedial alternatives

Your attention is directed to Article 11 of 23 CCR for the specific requirements and elements of a CAP.

The requested CAP is due within 90 days of the date of this letter, or by July 12, 1995.

Mr. Randall Nahas  
RE: 20405 Redwood Rd., Castro Valley  
April 13, 1995  
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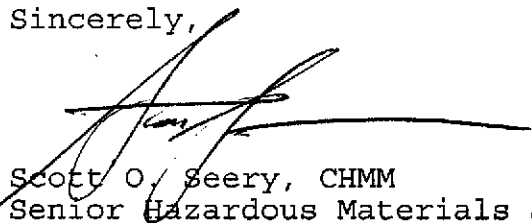
To facilitate the development of your CAP in the presence of current ground water data, please instruct your consultant to sample all wells in the network during the present (2nd) quarter, preferably before the end of April. Such data will likely better represent the "high-water" conditions expected as a result of the recent rains.

All samples, with exception of that which is collected from MW-7, should be analyzed for TPH-G and BTEX. To account for potential PCE interference, only analyze for the presence of BTEX in the sample collected from MW-7. The sample from MW-4 need not be analyzed for waste oil constituents (i.e., oil and grease, diesel) from this point forward.

Future sampling and monitoring may follow a **semi-annual** schedule, affected during the 1st and 3rd quarters of the year. Target analytes shall continue to be as noted above at this time. Increased or decreased sampling and monitoring frequencies may be warranted as this project progresses through the implementation stage of the pending CAP.

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

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director  
Gil Jensen, Alameda County District Attorney's Office  
Sum Arigala, RWQCB  
Alex Eskandari, BSK & Associates,  
1181 Quarry Ln., Building 300  
Pleasanton, CA 94566

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



#20405 Redwood Rd.

R0295

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 2, 1994

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

Randall Nahas  
R.T Nahas Company  
20630 patio Drive  
Castro Valley, CA 94546

Bill Kelly  
Marshall Steel Cleaners  
20457 Redwood Road  
Castro Valley, CA 94546

Ralph Saroni  
17896 Rockhurst Road  
Castro Valley, CA 94546

Melita Elmore  
Safeway Holdings Company, Inc.  
Environmental, Health and Safety Division  
201 Fourth Street  
Oakland, CA 94607

RE: 20405 AND 20457 REDWOOD ROAD, CASTRO VALLEY -  
PERCHLOROETHYLENE PLUME INVESTIGATION

Ms. Elmore and Messrs. Nahas, Kelly, and Saroni:

At the request of Mr. Jonathan Redding, council for Mr. Kelly, this office and that of the San Francisco Bay Regional Water Quality Control Board (RWQCB) have agreed to allow the record to remain open for an additional period of 30 days, beyond that already established in the wake of the February 15, 1994 Pre-Enforcement Review Panel. This extension is to allow sufficient time in which to collect and submit supplemental information to the Review Panel before a final decision is rendered.

Therefore, the record will remain open until the close of business on April 18, 1994. No other extensions will be granted.

Please feel free to call the undersigned at 510/271-4530 should there be any questions regarding the content of this letter.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist



Ms. Elmore and Messrs. Nahas, Kelly, Saroni  
RE: 20405 and 20457 Redwood Road  
March 1, 1994  
Page 2 of 2

cc: Rafat A. Shahid, Assistant Agency Director  
Gil Jensen, Alameda County District Attorney's Office  
Rich Hiatt, RWQCB

enfltr\2\20405redwood

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0295

STID 650

January 19, 1993

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Services  
UST Local Oversight Program  
80 Swan Way, Box 200  
Oakland, CA 94621  
(510) 271-4536

Mr. Randall Nahas  
R.T. NAHAS COMPANY  
20630 Patio Drive  
Castro Valley, CA 94546

Mr. Ralph Saroni  
17896 Rockhurst Road  
Castro Valley, CA 94546

Ms. Melita Elmore  
SAFEWAY HOLDINGS, INC.  
Environmental, Health  
and Safety Division  
201 Fourth Street  
Oakland, CA 94607

Mr. Bill Kelly  
MARSHALL STEEL CLEANERS  
20457 Redwood Road  
Castro Valley, CA 94546

RE: 20457 AND 20629 REDWOOD ROAD (ASSESSOR'S PARCEL NUMBERS  
84A-80-11-9 AND 84A-80-11-11), CASTRO VALLEY

Dear Ms. Elmore and Messrs. Nahas, Saroni and Kelly:

As you have all been made aware, an environmental investigation tracking the extent of a gasoline release from the adjacent Unocal station, located at 20405 Redwood Road, recently expanded its scope to the south, into the Safeway parking lot and driveway. Ground water sampled from one of the monitoring wells constructed during this phase of the investigation, designated MW-7 in the attached map, exhibited 14,000 parts per billion (ppb) of the compound perchloroethene (PCE), or "perc." Apparent breakdown products were also detected at elevated concentrations, including, but not limited to, trichloroethene (TCE) and cis-1,2 dichloroethene.

Perchloroethene is one of the most common chemicals used in a typical dry cleaner facility. The Marshall Steel Cleaners, located at 20457 Redwood Road, is essentially situated upgradient of well MW-7. Marshall Steel appears to be a potential source for the chlorinated compounds found in MW-7. The current investigation must expand to evaluate the extent of the contamination.

A meeting has been scheduled for Tuesday, February 2, with all affected parties to discuss the problem and determine an appropriate course of action. The meeting will be held at 9:30 AM at the Alameda County Environmental Health office in Oakland.

Elmore, Nahas, Sorani, and Kelly  
RE: 2057/20629 Redwood Road  
January 19, 1993  
Page 2 of 2

The office is located near the Oakland Airport, at 80 Swan Way, Room 200. Please call the undersigned at 510/271-4320 to confirm your attendance and should you have any questions.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

enclosure

cc: Rafat A. Shahid, Assistant Agency Director - w/o  
Rich Hiatt, RWQCB - w/enclosure  
Gil Jensen, Alameda County District Attorney's Office - w/o  
Amir Gholami, ACDEH - w/enclosure  
Tim Berger, BSK and Associates - w/o  
Frank Tien, Tien's Unocal - w/o  
Ed Howell - files - w/o

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0295

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

STID 650

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

November 17, 1992

Mr. Randall Nahas  
R.T. Nahas Company  
20630 Patio Drive  
Castro Valley, CA 94546

RE: TIEN'S UNOCAL, 20405 REDWOOD ROAD, CASTRO VALLEY

Dear Mr. Nahas:

Thank you for recently submitting the November 10, 1992 BSK and Associates (BSK) Ninth Quarterly Groundwater Monitoring Report documenting the current status of the ongoing environmental investigation associated with the referenced site. This report was reviewed subsequent to our review of all reports issued since, and including, January 1992.

This office concurs with the conclusions and recommendations presented at the close of the cited November 10, 1992 BSK report. Specifically, the extent of the ground water plume, south of well MW-7, has not been defined. Such plume definition must be fulfilled, particularly when such elevated levels of fuel contaminants are found in the down gradient well, as is the case with well MW-7.

A proposal for expanding the current soil and water investigation (SWI) must be submitted for review. This proposal shall include the installation of an appropriate number of monitoring wells to address the plume definition issue. We suggest, however, that the locations of these additional wells may be more cost-effectively located using such qualitative survey tools as soil vapor surveys or Hydropunch.

This proposal is due within 60 days of the date of this letter.

The cited November 1992 BSK report further documents that water collected during October 1992 from well MW-4, located adjacent to the waste oil underground storage tank, exhibited a "hit" for total petroleum hydrocarbons (TPH) characterized as diesel. This is the first time since this well has been sampled that contaminants have been detected. This well currently is sampled semiannually. As a result of this "hit," MW-4 shall now be sampled on a quarterly schedule, as with all other wells associated with this site.

Mr. Randall Nahas  
RE: 20405 Redwood Road  
November 17, 1992  
Page 2 of 2

The cited BSK report additionally recommends that water collected from well MW-7 be analyzed for volatile organic compounds to determine whether or not the dry cleaning establishment upgradient of this well may be a contributory source to the plume underlying the site. In this regard, we also recommend that water samples collected from this well also be analyzed for TPH as Stoddard solvent.

Please also submit copies of the gas chromatograms for the water samples collected during October from both wells MW-4 and -7. I have already discussed this issue with Mr. Tim Berger of BSK.

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

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director  
Gil Jensen, Alameda County District Attorney's Office  
Rich Hiatt, RWQCB  
Bob Bohman, Castro Valley Fire Department  
Tim Berger, BSK and Associates  
Frank Tien, Tien's Unocal

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program

R0295

RAFAT A. SHAHID, Assistant Agency Director

July 7, 1992

STID 650

Mr. Randall Nahas  
R.T Nahas Company  
20630 Patio Drive  
Castro Valley, CA 94546

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

RE: TIEN'S UNOCAL, 20405 REDWOOD ROAD, CASTRO VALLEY

Dear Mr. Nahas:

Thank you for your June 30, 1992 correspondence requesting that the Department's Local Oversight Program (LOP) consider naming Unocal Corporation as an additional responsible party (RP) for the purpose reimbursement notification. For your information, our contract with the State Water Resources Control Board, under which the county's LOP operates, stipulates that RPs be identified following both federal and state criteria. A partial listing of the entities identified as RPs is as follows:

- 1) Persons owning or operating an underground storage tank (UST) used to store a petroleum product;
- 2) Any owner of a property where an unauthorized release of petroleum from an UST has occurred; and,
- 3) Any person who had or has control over an UST at the time of or following an unauthorized release of petroleum occurred.

Our records show that subsurface contamination was first discovered at the subject site on December 5, 1989 during the installation of UST compliance monitoring wells, components of (former) monitoring alternative 6. An Unauthorized Leak Report was issued by this office on April 18, 1990.

We understand that R.T Nahas Company had taken over control of the site some years prior to a release being identified. Our files presently contain no information indicating the noted unauthorized release occurred during Unocal's ownership or operation of the site. We are, therefore, compelled by our contract to notify only those entities which meet the federal and state RP definitions.

Should you be able to present information documenting the release occurred during Unocal Corporation's control, ownership, and/or operation of the site, we will reconsider your request.

Mr. Randall Nahas  
RE: 20405 Redwood Road, Castro Valley  
July 7, 1992  
Page 2 of 2

Please call Scott Seery, Senior Hazardous Materials Specialist, at  
510/ 271-4530 should you have any additional questions.

Sincerely,



Thomas Peacock  
Supervisor, Local Oversight Program

cc: Sandra Malos, SWRCB  
Rich Heitt, RWQCB  
Bob Bohman, Castro Valley Fire Department

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0295

RAFAT A. SHAHID, Assistant Agency Director

April 28, 1992

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

Mr. Frank Tien  
Tien's Unocal Station  
20405 Redwood Rd.  
Castro Valley, Ca 94546

Re: **FIVE-YEAR PERMITS FOR OPERATION OF THREE  
UNDERGROUND STORAGE TANKS (UST'S) AT 20405  
REDWOOD RD. CASTRO VALLEY**

According to our records the above mentioned facility has not received a five-year permit to operate UST's. Please complete the following items marked below and return them to me within 30 days. The example plans enclosed, should be used only as guidelines and may not meet your requirements under Title 23.

- 1. Complete UST PERMIT FORM A-one per facility. (enclosed)
- 2. Complete UST PERMIT FORM B-one per tank. (enclosed)
- 3. Complete UST PERMIT FORM C-one per tank if information is available. (enclosed)
- 4. A written tank monitoring plan. (enclosed)
- 5. Results of precision tank test(s) (initial and annual).
- 6. Results of precision pipeline leak detector tests (initial and annual).
- 7. An accurate and complete plot plan. (enclosed)
- 8. A written spill response plan. (enclosed)

Title 23 of the California Code of Regulation prohibits the operation of ANY UST without a permit. Please feel free to contact Amir K. Gholami at (510) 271-4320, if you have any questions which may arise in completing the mandatory five-year permit process.

Sincerely,

Ravi Arulanantham  
Senior Hazardous Materials Specialist  
(5YR)

cc: Gil Jensen, Alameda County District Attorney  
Rafat Shahid, Assistant Agency Director, Alameda  
County Department of Environmental Health  
Danielle Stefani, Hazardous Materials Specialist, City of  
Livermore Fire Department



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0295

RAFAT A. SHAHID, Assistant Agency Director

February 3, 1992

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

Mr. Alex Eskandari  
BSK and Associates  
1181 Quarry Lane, Building 300  
Pleasanton, CA 94566

RE: OFF-SITE INVESTIGATION PROPOSAL; TIEN'S UNOCAL 76, 20405 REDWOOD ROAD, CASTRO VALLEY

Dear Mr. Eskandari:

The Department has completed review of the January 14, 1992 BSK and Associates lateral plume characterization proposal (BSK Proposal PR92001) for the referenced site.. This proposal has been accepted. Please be certain, however, that a minimum period of 24 hours is allowed to pass between well development and ground water sampling.

Please notify this office when field activities are slated to begin.

Sincerely,

  
Scott O. Seery, CHMM  
Senior 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  
Randall Nahas, R.T. Nahas Company  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RD345

December 10, 1991

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 300  
Oakland, CA 94621  
(415)

Mr. Randall Nahas  
R.T. Nahas Company  
20630 Patio Drive  
Castro Valley, CA 94546

RE: TIEN'S UNOCAL STATION, 20405 REDWOOD ROAD, CASTRO VALLEY

Dear Mr. Nahas:

As we discussed by telephone December 6, the Department has completed review of the following BSK and Associates (BSK) documents: the April 1991 soil boring report; and, the third, fourth, and fifth quarterly ground water monitoring reports dated May, July, and November 1991. The cited April 1991 soil boring report documents the advancement of 13 exploratory borings about the site, and the collection and analyses of several soil samples for the presence of fuel hydrocarbons.

The April 1991 report documents the presence of significant soil contamination in the south-central portion of the site, primarily between 10 feet in depth and the first encountered ground water. The southern extent of the soil contamination was not determined due to the presence of a retail building spanning the southern property boundary. The sediments encountered in borings advanced during this stage of the investigation appear consistent with those of a fluvial, or stream, depositional environment. BSK has identified a clayey/silty-sand "horizon" which appears to be the primary water-bearing unit. The upper surface of this unit undulates at depths between approximately 13 feet in the south-central portion of the site, to as much as 20<sup>+</sup> feet to the east. No downgradient wells were installed.

The May, July, and November 1991 monitoring reports document the results of ground water sampling occurring during April, July and October 1991, respectively. The July and November reports document the marked attenuation of contaminant concentrations in wells MW-2 and -3 since the April sampling event. This attenuation is likely the result of ground water levels lowering to a depth beyond the influence of a zone of high contaminant concentration. Well MW-4 continues to show nondetectable (ND) concentrations of target compounds.

Mr. Randall Nahas  
RE: Tien's Unocal, 20405 Redwood Road  
December 10, 1991  
Page 2 of 3

Review of the investigative record for this site indicates that the southern extent of soil contamination has not been determined. Further, ground water is impacted, yet no downgradient wells are installed and being monitored, and the extent of ground water contamination is unknown. Hence, additional work is required at this site.

At this time, the following tasks must be performed:

- 1) Define the southern extent of soil contamination. This will require that borings be advanced on the adjoining property to the south of the subject site. [For your information, Section 25299.78 of the State Health and Safety Code provides authority for the collection of samples (e.g., soil, water, biota, etc.), both on and below the land, from any real property which is within 2,000 feet of any place where underground storage tanks are located.]
- 2) Install downgradient wells. Define the limits of the ground water contaminant plume. This will require the installation of a suitable number of wells, likely to the south, southwest, and southeast of the perceived source (i.e., the underground storage tanks, piping, and dispensers), and may include the installation of wells off-site (See authority statement cited above.)
- 3) Determine the source of the contamination found at this site.
- 4) Continue monitoring existing wells according to existing schedule.

Please have your consultant submit a work plan tailored to address Tasks 1-3 outlined above. All reports and proposals must be submitted under seal of an appropriate California-registered professional. This work plan is due within 45 days of the date of this letter, or by January 24, 1992.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 11267 (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 the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Mr. Randall Nahas  
RE: Tien's Unocal, 20405 Redwood Road  
December 10, 1991  
Page 3 of 3

Should you have any questions about the content of this letter,  
please call me at 510/271-4320.

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

enclosure

- 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
- Frank Tien, Tien's Unocal
- Tim Berger, BSK and Associates
- files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0295

Certified Mailer # P 062 128 099

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

October 16, 1990

Mr. Robert T. Nahas  
R.T. Nahas Company  
20630 Patio Drive  
Castro Valley, CA 94546

RE: REVIEW OF QUARTERLY MONITORING REPORT / SUPPLEMENTAL WORK PLAN  
PROPOSAL; TIEN'S UNOCAL, 20405 REDWOOD ROAD, CASTRO VALLEY,  
ALAMEDA COUNTY

Dear Mr. Nahas:

This Department is in receipt and has completed review of the August 30, 1990 BSK & Associates report entitled "Quarterly Monitoring Report and Work Plan for Supplemental Contamination Assessment, Unocal 76 Service Station, 20405 Redwood Road, Castro Valley, California". This report documents the results of sampling activities occurring during August 1990, and provides a proposed scope of work for additional investigative activities planned at the referenced site.

The noted work plan has been accepted by this Department for this stage of the site investigation, with the following conditions:

- 1) As recommended in the noted BSK report, as well as in correspondence dated October 3, 1990 from Mr. Jay A. Woidtke, precision tank and piping tests should be performed in an attempt to identify any current leaks originating from the underground storage tank (UST) systems. Such tests are required to be performed yearly as an element of your monitoring alternative, both for fuel and waste oil USTs. Piping is to be isolated from the tanks and tested separately. The last "system" test performed upon the fuel USTs was on June 6, 1989; the waste oil tank was tested several weeks prior;
- 2) An Unauthorized Leak Report was already filed by this Department on April 18, 1990;
- 3) As indicated in the noted BSK proposal, following the interpretation of laboratory results and field observations made during the advancement of proposed borings south and southwest of the fuel UST cluster, the appropriate location, or locations, of downgradient well(s) must be determined;

Mr. Robert T. Nahas  
RE: Tien's Unocal, 20405 Redwood Road  
October 16, 1990  
Page 2 of 3

- 4) A well upgradient of the fuel islands should be installed at this time to establish "zero lines" of ground water contamination, and to explore the potential for an off-site source. Current ground water analysis data indicates that samples collected during August 1990 exhibit elevated levels of fuel hydrocarbons in both wells MW-2 and -3, even though prior (Dec. 1989) sampling identified limited contamination in MW-2, only.

The potential for off-site migration of contaminants onto the subject site may exist: a former Exxon service station was located at 20450 Redwood Road, across the street from Tien's Unocal. Some investigative work (i.e., borings) was conducted at the site in 1987 (?) with negligible results.

However, because ground water gradients often change direction seasonally due to variations in the rate of precipitation and water infiltration, a back-and-forth "flushing" action can, and does, occur, and may result in the appearance of contaminants in wells thought to be upgradient of the perceived source;

- 5) Water levels of each well must be measured and recorded monthly for the next year, **beginning October 1990**, and then quarterly thereafter. Such data is to be tabulated and presented on ground water gradient maps;
- 6) All wells, except MW-4, are to be sampled monthly for the first quarter, **beginning October 1990**. The monthly sampling frequency may be reduced to quarterly sampling after the first three months provided the concentrations of target compounds significantly diminish or stabilize. Well MW-4 shall be field screened quarterly and samples analyzed semi-annually (as stated in the April 26, 1990 correspondence from this Department);
- 7) All wells should be surveyed to an established or designated datum, to the accuracy of 0.01 foot, and converted to elevations above mean sea level (MSL);
- 8) Summary reports are to be submitted quarterly to this Department and the RWQCB for the duration of this project, as designated by final "sign off" by the RWQCB. Such quarterly reports are to detail work performed during the reporting period, 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).

Mr. Robert T. Nahas  
RE: Tien's Unocal, 20405 Redwood Road  
October 16, 1990  
Page 3 of 3

**The next quarterly report is due February 1, 1991, and must document activities performed during the 4th quarter of 1990, including both investigative and compliance monitoring.**

As was previously requested in correspondence from this office dated July 31, 1990, you are required to submit a check payable to Alameda County totalling \$744 to cover present and future costs incurred by this Department during oversight of this case. This payment is currently overdue, and must be remitted immediately.

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 the required tasks, must be confirmed in writing from either this agency or the RWQCB.

Should you have any questions regarding the content of this letter, please contact 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  
Howard Hatayama, DHS  
Lester Feldman, RWQCB  
Bob Bohman, Castro Valley Fire Department  
Jay Woidtke, Esq.  
Frank Tien  
Alex Eskandari, BSK  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0295

Certified Mailer # P 062 128 152

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

July 31, 1990

Mr. Robert T. Nahas  
R.T. Nahas Company  
20630 Patio Drive  
Castro Valley, CA 94546

RE: TIEN'S UNOCAL, 20405 REDWOOD ROAD, CASTRO VALLEY: REQUEST FOR  
SITE ASSESSMENT

Dear Mr. Nahas:

Reference is made to the April 26, 1990 correspondence from this office which summarizes those actions agreed upon by participants of the April 24, 1990 meeting between this Department and those representing R.T. Nahas Company and their consultant. A copy of this letter is attached. To date, of the five (5) actions listed in the referenced letter, only item 5 has been addressed. All others remain outstanding.

This Department has been expending effort for more than a year to bring Tien's Unocal into compliance with applicable California laws and regulations regarding the storage of hazardous materials, both above and below ground, and the generation of hazardous waste. Our efforts have been informative and patient. Letters addressed to your company have explained in detail what is required to meet the obligations mandated by state law. Deadlines have come and gone with little, if any, effort to comply.

Most recently was the deadline of May 9, 1990 to submit a proposal to assess the extent of soil and ground water contamination in an area southwest of the underground fuel tank cluster. As you may recall from your reading of the February 5, 1990 BSK and Associates report, two (2) failed attempts were made to install a ground water monitoring well in this location, one of four (4) compliance wells planned for this site and the only well location downgradient of the tank cluster. These efforts were aborted when contamination was detected in soil and ground water in both borings MW-1 and MW-1A. To date, no such proposal has been received by this Department.

Further, monitoring wells MW-2, -3, and -4 were to be sampled and analyzed the week immediately following the April 24 meeting, the results of which analyses were to have been submitted to this Department no later than May 14, 1990. Such sampling and reporting was to have followed quarterly thereafter. Again, no reports have been received by this Department as of this writing.

Lastly, tank reconciliation reports, one element of the monitoring method approved for the underground storage tanks (UST) at this site, were to have been submitted quarterly. To date, no such reports have been received by this office.



Mr. Robert T. Nahas  
RE: Tien's Unocal, 20405 Redwood Road  
July 31, 1990  
Page 2 of 4

It is clear to this Department that compliance with Subchapter 16 of Title 23, California Code of Regulations (CCR), as it applies to UST monitoring and assessment of contamination which may have resulted from an unauthorized release from same, has not been met. Please be advised that Section 25299, of Chapter 6.7 of the California Health and Safety Code (H & SC), provides for civil penalties of up to \$5,000 per day for any of the following:

- (a)(1) Operates an underground storage tank which has not been issued a permit;
- (a)(2) Fails to monitor the UST;
- (b)(4) Knowing failure (by the owner) to take reasonable and necessary steps to insure compliance with this chapter by the operator of an UST.

This Department is aware that this facility is currently operating without benefit of a permit, and that prudent steps have not been taken to adequately monitor the USTs. Continued failure to monitor your USTs shall be cause to require their closure. Further, based upon the evidence presented in the referenced BSK and Associates report, we have concern that an unauthorized release has occurred at this site.

Consequent to the violations noted above, you directed to perform the following tasks:

- o Cause to perform an additional subsurface investigation, or "Preliminary Site Assessment";
- o Monitor your USTs according to the approved monitoring plan, or submit an application for their closure.

The required preliminary site assessment (PSA) will help to define the vertical and lateral impact upon ground water and soils resulting from any releases from the tank system. The information gathered by this investigation will be used to determine an appropriate course of action to remediate the site, if necessary. The PSA must be conducted in accordance with the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks. The major elements of such an investigation are summarized in the attached Appendix A.

In order to proceed with a site investigation, you should obtain 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 the attached Appendix A.

Mr. Robert T. Nahas  
RE: Tien's Unocal, 20405 Redwood Road  
July 31, 1990  
Page 3 of 4

This Department will oversee the site assessment for the referenced facility. This oversight will include our review and comment on work proposals and technical guidance on appropriate investigative approaches. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7. The RWQCB may choose to take over as lead agency if it is determined following the completion of the initial assessment that there has been a substantial impact upon ground water.

This PSA proposal is due within 30 days of the date of this letter, or by August 31, 1990. Once this proposal has been reviewed and approved, work should commence no later than September 30, 1990. Accompanying this proposal must be a check payable to Alameda County totalling \$744 to offset expenses incurred by this Department in oversight of this project.

A report must be submitted within 30 days after the completion of this phase of work at the site. Subsequent reports must be submitted quarterly until this site qualifies for final RWQCB "sign off". Such quarterly reports are due the first day of the second month of each subsequent quarter (i.e., November 1, February 1, May 1, and August 1). These reports should describe the status of the remediation/investigation and must include, among others, the following elements:

- 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 Status of ground water contamination characterization
- o Interpretation of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations or plans for additional investigative work or remediation

All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. Please include a statement of qualifications for each lead professional involved with this project.

Mr. Robert T. Nahas  
RE: Tien's Unocal, 20405 Redwood Road  
July 31, 1990  
Page 4 of 4

UST monitoring must follow the requirements imposed by alternative 6, as proposed by BSK and Associates on your behalf, chosen to meet compliance with Section 2641(c), 23 CCR. Therefore, your attention is directed to item 3 of the attached April 26 correspondence from this Department for specific details regarding ground water sample collection and analysis scheduling and test methods. Such sampling procedures are to be repeated quarterly through the life of the UST systems. Be advised that an additional element of monitoring alternative 6 includes the submittal, also on a quarterly basis, of tank reconciliation reports. Your attention is directed to item 4 of the April 26 correspondence for details regarding this procedure.

You are directed to begin sampling activities immediately, followed by the submittal of a report documenting the results of analysis and field protocol. The first of the noted sampling reports is to be submitted to this Department no later than August 31, 1990 and must reflect sampling activities occurring during that same month. Subsequent monitoring (sampling) reports are to be submitted following the same quarterly schedule as outlined for the soil and ground water investigation. Failure to meet this obligation by the noted date will require removal of the USTs.

Please be advised that this letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a late response will 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, in addition to those penalties listed elsewhere in this letter. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Should you have any questions about 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, Alameda County  
Department of Environmental Health  
Edgar Howell, Chief, Hazardous Materials Division  
Gil Jensen, Alameda County District Attorney's Office  
Lester Feldman, RWQCB  
Howard Hatayama, DHS  
Bob Bohman, Castro Valley Fire Department  
Frank Tien

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0295

April 26, 1990

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

Ms. Roberta Buchan  
R.T. Nahas Company  
20630 Patio Drive  
Castro Valley, CA 94546

RE: TIEN'S UNOCAL, 20405 REDWOOD ROAD, CASTRO VALLEY: SUMMARY OF  
APRIL 24, 1990 MEETING

Dear Ms. Buchan:

This letter shall serve to summarize the issues which were discussed and the course of action agreed upon during the meeting April 24, 1990 between: yourself, as agent for R.T. Nahas Company; Messrs. Alex Eskandari and Martin Cline, representing BSK and Associates; Mr. Frank Tien, operator of Tien's Unocal, the subject facility; and, this author, representing Alameda County Department of Environmental Health, Hazardous Materials Division.

As you may recall, this meeting was prompted, in part, as a result of work performed by BSK and Associates in December 1989 which revealed the presence of subsurface contamination in both soil and groundwater. This condition was noted during the installation of groundwater monitoring wells in proximity to the southwestern corner of the underground fuel storage tank (UST) cluster. Wells were being installed to comply with the requirements of monitoring alternative 6, in accordance with Subsection 2641(c)(6) of Subchapter 16, Title 23, California Code of Regulations (CCR). This monitoring alternative was originally proposed by BSK and Associates, on behalf of R.T. Nahas Company, under cover dated November 20, 1989, and subsequently approved by this Department on December 7, 1989.

Monitoring alternative 6 requires, among other elements, the installation and monitoring of a suitable number of groundwater wells. The exact number of wells required is based on several factors, including the number and size of tanks and their proximity to each other. Whatever the final number may be, at least one (1) well must be sited in the confirmed downgradient position from the tank cluster.

Because soil contamination, as well as a shallow zone of contaminated "perched" groundwater, was noted during the advancement of borings MW-1 and MW-1a, these borings, located in the downgradient position, were not completed as wells for fear of dragging contaminants into the deeper aquifer underlying the site. Therefore, no downgradient wells currently exist and, as a result, this facility is currently in noncompliance with the monitoring requirements stipulated under Subsection 2641(c)(6) 23 CCR.

Ms. Roberta Buchan  
RE: Tien's Unocal, 20405 Redwood Road  
April 26, 1990  
Page 2 of 3

In order to proceed with the assessment of subsurface contamination in the area of borings MW-1 and MW-1a, and comply with the requirements for UST monitoring and registration, the following actions are to be implemented:

- 1) Your consultant (BSK) is to prepare, and submit for review and approval by this Department, a brief proposal outlining methods to determine the vertical and lateral extent of subsurface contamination in proximity to MW-1 and MW-1a. This will likely involve the advancement of several shallow borings, field screening of drill cuttings using a suitable hydrocarbon detector (i.e., OVA, PID, GC, etc.), and laboratory analyses of obviously "hot" samples to document the severity of the contamination in this area. Soils are to be logged continuously by the geologist overseeing the field work. All proposals and reports are to be signed by registered professional in the State of California. This proposal is due within 15 days of the date of the April 24 meeting, or by May 9, 1990.
- 2) Upon submittal of the report documenting the activities outlined in item 1 above, a decision will be made by the property owner, R.T. Nahas Company, whether to: a) continue operating the facility and, as a result, excavating the contaminated material, filling the excavation with verified clean material, paving, installing the requisite downgradient well, and monitoring of all wells according to a strict schedule; or, b) closure of the station and removal of the USTs.
- 3) Monitoring wells MW-2 and MW-3, as well as a new MW-1 when (or if) installed, are to be sampled and such samples analyzed quarterly by a state certified laboratory. At this time, MW-4 (near the waste oil UST) is to be field screened quarterly, and sampled for laboratory analyses semi-annually. Wells MW-2, -3, and -4 were last sampled in December 1989. No sampling or field screening occurred during the first quarter of 1990 (Jan. - Mar.). Therefore, sampling of MW-2, -3, and -4 shall occur immediately and the results reported by May 14, 1990. Wells MW-2 and -3 are to be analyzed for total petroleum hydrocarbons as gasoline (TPH-G) and volatile organics (BTXE); MW-4 is to be analyzed for the total oil and grease (TOG), volatile organics, and heavy/ extractable hydrocarbons (i.e., TPH-D). Such test methods should be followed consistently for all subsequent sampling episodes unless otherwise notified by this office.

Ms. Roberta Buchan  
RE: Tien's Unocal, 20405 Redwood Road  
April 26, 1990  
Page 3 of 3

- 4) Tank reconciliation (metered vs. "sticked" readings) shall occur daily. Variations shall not exceed those allowed for the approved monitoring method, as outlined in Subsection 2641(c)(6)(B) 23 CCR. Pursuant to Subsection 2644(e), the facility operator shall submit on a quarterly basis a statement to this Department, under penalty of perjury, that either: the data is within allowable variations, or a listing of dates and variations that exceed the allowable values. Such variations may indicate a loss of product from the USTs, and will require the operator to implement steps outlined in Subsection 2644(f)(1)-(8). Mr. Tien was provided with forms which he may use to submit his quarterly reports to this Department, as well as the sections of 23 CCR noted above.
- 5) New UST Registration forms (forms A and B) were completed by Mr. Tien and submitted for data processing following the April 24 meeting.

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  
Edgar Howell, Chief, Hazardous Materials Division  
Gil Jensen, Alameda County District Attorney's Office  
Howard Hatayama, DHS  
Lester Feldman, RWQCB  
Bob Bohman, Castro Valley Fire Department  
Alex Eskandari, BSK and Associates  
Frank Tien  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0295

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

December 7, 1989

Ms. Roberta Buchan  
R.T. Nahas Company/Eden Management  
20630 Patio Drive  
Castro Valley, CA 94546

RE: UNDERGROUND STORAGE TANK MONITORING PROPOSAL,  
20405 REDWOOD RD., CASTRO VALLEY

Dear Ms. Buchan:

We are in receipt of and have reviewed the latest underground storage tank (UST) monitoring proposal for the referenced site as submitted by BSK & Associates under cover dated November 20, 1989. This proposal involves the implementation of an acceptable monitoring alternative pursuant to Section 2641(c)(6), of Title 23, California Code of Regulations (CCR). As such, this proposal has been approved by this office.

Please be advised that, as with all UST monitoring procedures, records documenting tank monitoring results (i.e., inventory reconciliation, laboratory and field screening results, integrity tests, etc.) are required to be maintained on the premises for a period of time not less than 3 years. Further, on a quarterly basis a statement must be submitted to this agency which declares, under penalty of perjury, that either reconciliation data is within allowable variations or provides a listing of dates and variations that exceed the allowable variations.

Additionally, we are still awaiting receipt of the following items for both the 20405 Redwood Road and 20630 Patio Road sites in Castro Valley, as identified in the October 19, 1989 correspondence from this office:

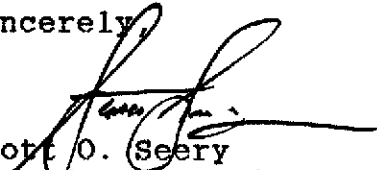
- 1) UST permit application forms A and B;
- 2) Business Plan application forms.

Ms. Roberta Buchan  
RE: 20405 Redwood Rd.  
Castro Valley  
December 7, 1989  
Page 2 of 2

These documents are required by state law to be submitted to this agency. Continued failure to respond to these requests will result in the issuance of a Notice of Violation and referral of this case to the Alameda County District Attorney's Office for potential prosecution.

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

Sincerely,



Scott O. Seery  
Hazardous Materials Specialist

SOS:mam

cc: Rafat A. Shahid, Assistant Agency Director, Alameda County  
Department of Environmental Health  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Mark Thompson, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Lester Feldman, RWQCB  
Bob Bohman, Castro Valley Fire Department  
Alex Eskandari, BSK & Associates  
Files



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0295

Certified Mailer #P 062 127 681

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

October 19, 1989

Mr. Frank Tien  
Frank Tien Unocal  
20405 Redwood Road  
Castro Valley, CA 94546

RE: BUSINESS PLAN

Dear Mr. Tien:

Pursuant to Section 25500 et seq., Chapter 6.95 of the California Health and Safety Code, you are required to submit a Business Plan as an operator of a facility who handles, stores, and/or uses hazardous materials. This agency is the recipient of Business Plans from facilities within unincorporated areas of Alameda County, such as Castro Valley.

You were notified in a letter from this office dated April 10, 1989 that Part I of the Business Plan form was incorrect and that you must resubmit a corrected version within 30 days. To date, this has not been done.

At this time, you are directed to resubmit the enclosed Part 1 form and the Business Plan application. The Business Plan application is included with a packet of reference information to aid you in completion of your plan.

The completed Business Plan and Part 1 form must be submitted within 30 days, or by November 18, 1989. Failure to submit the requested information will result in your case being referred to the Alameda County District Attorney for possible enforcement action.

Mr. Frank Tien  
Frank Tien Unocal  
20405 Redwood Road  
Castro Valley  
October 19, 1989  
Page 2 of 2

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

Sincerely,



Scott Seery  
Hazardous Materials Specialist

SOS:mam

cc: Rafat A. Shahid, Assistant Agency Director, Alameda County  
Environmental Health  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Bob Bohman, Castro Valley Fire Dept.  
R.T. Nahas, R.T. Nahas Company  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0295 (20405  
Redwood)

Certified Mailer #P 062 127 682

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

October 19, 1989

Mr. R. T. Nahas  
R. T. Nahas Company/Eden Mgmt.  
20630 Patio Drive  
Castro Valley, CA 94546

RE; UNDERGROUND STORAGE TANK MONITORING, TANK REGISTRATION,  
BUSINESS PLANS: 20405 REDWOOD ROAD AND 20630 PATIO DRIVE,  
CASTRO VALLEY

Dear Mr. Nahas:

We are in receipt and have completed review of the underground storage tank (UST) monitoring proposal for the 20405 Redwood Road site, as submitted under cover dated September 19, 1989 by BSK and Associates.

The proposed monitoring method involves the installation of several groundwater monitoring wells in proximity to the UST fields. This essentially reflects the elements of monitoring alternative 4, as described under Section 2641(c)(4), of Title 23, California Code of Regulations (CCR).

The State Water Resources Control Board, in a letter to this office dated May 23, 1989, has confirmed that monitoring alternative 4 is an unacceptable monitoring method in the San Francisco Bay region. The use of this monitoring alternative is restricted solely to sites with unusable groundwater. All groundwater in the San Francisco Bay region is considered to be of actual or potential beneficial use. Therefore, the noted monitoring proposal submitted by BSK and Associates is not acceptable.

Mr. R.T. Nahas  
R.T. Nahas Company/  
Eden Management  
October 19, 1989  
Page 2 of 3

There are other monitoring methods described under Section 2641 et seq. of 23 CCR which are applicable, however. You were required, according to Section 25292 of the State Health and Safety Code, to have implemented one of these alternatives by January 1, 1985. Further, pursuant to Section 2610(b), 23 CCR, you are also required to enter into a written contract with the station operator to:

- 1) monitor the underground storage tank;
- 2) maintain appropriate records;
- 3) implement reporting procedures as required by the UST permit; and,
- 4) properly close the underground storage tank upon vacating the facility.

You are directed to submit a viable plan for monitoring the USTs at the 20405 Redwood Road site, as well as those USTs associated with your business at 20630 Patio Drive in Castro Valley. The monitoring proposals must be submitted within 15 days of the date of this letter, or by November 3, 1989.

Additionally, as has been previously discussed with Roberta Buchan of your firm, the California Water Resources Control Board UST permit application forms submitted by the station operator, Frank Tien, are incorrect or incomplete in several significant areas. As a result, new forms must be filled out and resubmitted. Further, the UST at the Patio Drive address is not currently registered. As such, you are also required to complete and submit UST permit application forms for this site. Enclosed are blank forms for this purpose. One Form A must be completed for each site, and must be accompanied by one Form B for each tank at each site. These forms must be completed and submitted to this office within 15 days, or by November 3, 1989.

Lastly, as a facility which handles, stores, and/or uses hazardous materials and pursuant to Chapter 6.95, Section 25500 et seq. of the California Health and Safety Code, you are required to submit a Business Plan. Enclosed is a packet of information and a Business Plan application which you are requested to complete. The completed Business Plan must be submitted within 30 days, or by November 18, 1989. Your tenant, Frank Tien, will be contacted under separate cover requesting the submittal of a Business Plan for the 20405 Redwood Road site.

Mr. R.T. Nahas  
R.T. Nahas Company/  
Eden Management  
October 19, 1989  
Page 3 of 3

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

Sincerely,



Scott Seery  
Hazardous Materials Specialist

SOS:man

Enclosures

cc: Rafat A. Shahid, Assistant Agency Director, Alameda County  
Department of Environmental Health  
Lester Feldman, RWQCB  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Alex Eskandari, BSK & Associates  
Bob Bohman, Castro Valley Fire Department  
Frank Tien, Frank Tien Unocal  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0295

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

April 10, 1989

Mr. Frank Tien  
Unocal Service Station  
20405 Redwood Road  
Castro Valley, CA 94546

RE: TANK REGISTRATION AND BUSINESS PLAN

Dear Mr. Tien:

This letter follows your telephone conversation of April 10, 1989 with Mr. Scott Seery of this office regarding the referenced items. As Mr. Seery indicated, the Business Plan - Part I form submitted by you on February 22, 1989 does not properly represent the potential quantities of materials stored or used at your facility. We currently have on record that there are three (3) underground storage tanks (UST) at this site; two (2) 10,000-gallon fuel tanks and one (1) 550-gallon waste oil tank. Therefore, information submitted on the Part I application should reflect the capacities of these tanks, as well as the quantities of any other materials stored on-site. Please find enclosed another copy of the Part I form for your completion.

Additionally, Section 2640 of Article 4, Title 23 of the California Code of Regulations (CCR) requires the owners/operators of existing USTs to implement a monitoring alternative consistent with those identified under Section 2641, CCR. Furthermore, Section 25292, Chapter 6.7 of the California Health and Safety Code (H & SC) requires that, for each UST installed on or before January 1, 1984, the owner shall outfit the facility with a monitoring system capable of detecting unauthorized releases. We understand a proposal for such a monitoring plan was submitted to R.T. Nahas, the owner of the property, by BSK and Associates under cover dated June 8, 1987, and included the installation of three (3) ground-water monitoring wells. According to information provided to Mr. Seery during your phone conversation, these wells have not been installed.

Mr. Frank Tien  
Unocal Service Stn.  
20405 Redwood Rd.  
Castro Valley  
April 10, 1989  
Page 2 of 2

As a result, your station is in noncompliance with UST monitoring requirements set forth under Article 4 of the CCR and Section 25292 of the H & SC. To avoid receipt of a Notice of Violation from this department, you must submit an UST registration form for each tank and identify how each will be monitored in accordance with the referenced codes. This will likely involve the installation of groundwater monitoring wells or the implementation of another suitable alternative. Your attention is directed to Section 2641, Title 23 of the CCR, for a description of available monitoring alternatives.

The completed UST registration forms (Parts A and B), tank monitoring proposals, and the amended Part I of the Business Plan form must be submitted within 30 days from the receipt of this letter. Failure to comply with this request will result in the issuance of a Notice of Violation and any legal repercussions which may follow.

You may contact Scott Seery, Hazardous Materials Specialist, at (415) 271-4320 should you have any questions.

Sincerely,



Rafat A. Shahid, Chief  
Hazardous Materials Division

SOS:mam

cc: Bill Brown, Unocal  
R.T. Nahas, R.T. Nahas Company  
Scott Seery, Alameda County Hazardous Materials Division  
Files

enclosures