

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
027406

February 9, 2006

Mr. Hooshang Hadjian  
2108 San Ramon Valley Blvd.  
San Ramon, CA 94583

Mr. Mark Inglis  
Chevron  
6001 Bollinger Canyon Rd., K2256  
P.O. Box 6012  
San Ramon, CA 94583

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

Dear Messrs. Hadjian and Inglis:

Subject: Fuel Leak Case RO0000304, Dublin Auto Wash, 7240 Dublin Blvd.,  
Dublin, CA 94568

Alameda County Environmental Health (ACEH) staff has reviewed the file for the subject site including the February 20, 2005 Soil and Water Investigation Work Plan and the January 20, 2006 Soil and Water Investigation Work Plan-Addendum prepared by Pangea Environmental Services, Inc. These work plans respond to the County's November 2, 2004 technical letter and follow a January 6, 2006 meeting with Pangea consultant, Bob Clark-Riddell and our office. The work plan includes a wide scope of work and is approved with the following technical comments and requests.

#### TECHNICAL COMMENTS

1. Well Decommission Proposal- As indicated in the prior Secor technical report, groundwater bearing zones appear to exist in three zones, labeled shallow, middle and deep. Although it is uncertain how contiguous these zones may be, wells screened across all three zones compromise analytical results and may allow for vertical contaminant migration. Therefore, we concur with the proposal to decommission wells MW-3, EA-1, EA-2 and EA-3.
2. Conduit/Preferential Pathway Study- The sewer running along the northern boundary of the property was identified as a potential preferential pathway for groundwater migration. This could pose a risk due to the presence of elevated MTBE in this area. Therefore, the proposal to advance at least one boring along the sewer line and collect soil and a groundwater sample is approved. Further investigation of nearby wells and surface water bodies may be put on hold until the completion of this investigation and actual threat evaluated.
3. Additional Soil Characterization Down-gradient of Dispenser- To address this earlier request, soil boring SB-2 and MW-10 are proposed to investigate both soil and groundwater delineation in the presumed down-gradient direction. In addition, we concur that the results from sampling of SB-2 shall be used to determine the need for the replacement of well EA-1.

4. Replacement of Wells- Additional wells with appropriately screened intervals in the shallow, middle and deep water bearing zones are proposed to better characterize and monitor the contaminant plume. Since the middle water bearing zone does not appear in all locations, some of the wells propose only a shallow and deep replacement well cluster. In other wells where contamination has not been identified in any of the three zones, there appears no need to replace these wells. The wells proposed wells; MW3A, MW6A/B/C, MW-7A/B/C, MW-8A, MW-9A/C, MW10A/C and MW11C are approved. We recommend that the location of MW-9A/C be moved to the location of well EA-3 given the lack of contamination historically found in EA-2 and the recent detection of significant TPHg and MTBE in EA-3.
5. Interim Remediation- Vacuum extraction from well MW-3A and (MW-6A and MW-7A) based upon groundwater concentrations is proposed. Vacuum extraction should be considered from those wells exhibiting elevated petroleum contaminant levels including the vapor wells. Therefore, vapor wells that contain groundwater should be sampled to see if they are in source areas that would be affected by vacuum extraction. We concur that additional remediation testing ie aquifer testing should be deferred until the completion of the proposed investigation and interim remediation.
6. Chemical Analysis- Pangea proposes to analyze the soil and groundwater samples for TPHg, BTEX and MTBE using EPA Method 8021. If MTBE is detected both its presence and that of the other oxygenates will be confirmed using EPA Method 8260. This is acceptable, however, plume characterization will require the complete analysis of the oxygenates and lead scavengers prior to site closure consideration.

#### TECHNICAL REPORT REQUEST

Please submit the following technical reports to our office according to the following schedule:

- April 11, 2006- Soil and Groundwater Investigation Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

#### ELECTRONIC SUBMITTAL OF REPORTS

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

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic%20reporting)).

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

#### PERJURY STATEMENT

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

#### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

#### UNDERGROUND STORAGE TANK CLEANUP FUND

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

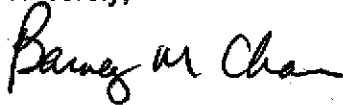
Messrs. Hadjian and [redacted]  
February 9, 2006  
Page 4 of 4

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos

Bob Clark-Riddell, Pangea, 1710 Franklin St., Suite 200, Oakland, CA 94612  
Matt Katén, Zone 7 Water District, QIC 80201

2\_9\_06 7240 Dublin Blvd

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT  
12-21-04

December 21, 2004

Hooshang Hadjian  
Dublin Auto Wash  
7240 Dublin Blvd.,  
Dublin, CA 94568

Karen Streich  
ChevronTexaco EMC  
P.O. Box 6012  
San Ramon, CA 94583-2324

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

Subject: Fuel Leak Case No. RO0000304, Dublin Auto Wash, 7240 Dublin Blvd., Dublin, California – Technical Report Late Letter

Dear Mr. Hadjian and Ms. Streich:

Alameda County Environmental Health (ACEH) requested a soil and water investigation workplan by December 20, 2004. Your site overlies a sensitive drinking water aquifer, and to date, limited progress has been made toward delineating or mitigating the petroleum hydrocarbon and MTBE impacts. The lateral and vertical extents of subsurface contamination is undefined. We reiterate our requests for site characterization and interim remedial action.

Your soil and water investigation workplan is currently late, and your fuel leak site is not in compliance with ACEH directives. We request that you submit your report as soon as possible. ACEH makes this request pursuant to California Health & Safety Code Section 25296.10, 23 CCR sections 2652 through 2654, and 2721 through 2728 outline the duties of a responsible party in response to a reportable unauthorized release from a petroleum UST system, and require your compliance with this request.

If it appears as though significant delays are occurring, or reports are not submitted as requested, we will consider referring your case to the County District Attorney or other appropriate agency, for enforcement. California Health and Safety Code, Section 25299.76 authorizes ACEH enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Please note that further delays in investigation, late reports, or enforcement actions may result in your becoming ineligible to receive cost reimbursement from the State's Underground Storage Tank Cleanup Fund.

Please call me at (510) 567-6719 or contact me via email at [robert.schultz@acgov.org](mailto:robert.schultz@acgov.org) with any questions regarding this case.

Sincerely,

Robert W. Schultz, R.G.  
Hazardous Materials Specialist

cc: Bob Foss, Cambria Environmental Technology, Inc., 5900 Hollis St., Ste. A, Emeryville,  
CA 94608  
Matt Katen, Zone 7 Water District, QIC 80201  
Dave Charter, SWRCB-USTCF, P.O. Box 944212, Sacramento, CA 94244  
Donna Drogos, ACEH  
Robert W. Schultz, ACEH

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ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SCWT  
11-3-04

November 2, 2004

Hooshang Hadjian  
Dublin Auto Wash  
7240 Dublin Blvd.,  
Dublin, CA 94568

Karen Streich  
ChevronTexaco EMC  
P.O. Box 6012  
San Ramon, CA 94583-2324

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

Subject: Fuel Leak Case No. RO0000304, Dublin Auto Wash, 7240 Dublin Blvd., Dublin, California – Response to Investigation Report and Request for Workplan

Dear Mr. Hadjian and Ms. Streich:

Alameda County Environmental Health (ACEH) has reviewed your June 3, 2003 *Soil and Groundwater Investigation* report and the case file for the above-referenced site. To date, a number of tasks required by ACEH's April 9, 2003 workplan approval letter have not been performed. In addition, the extent of soil and groundwater contamination at your site remain undefined. ACEH's October 21, 2002 letter presented a series of tasks and an approach to investigate and cleanup your site. To the detriment of water quality, you have taken minimal action toward implementing the requested tasks. We request that you address the following technical comments and submit the requested report following the schedule below.

#### TECHNICAL COMMENTS

##### 1) Regional Geologic and Hydrogeologic Study

We request that you perform a study of the regional geologic and hydrogeologic setting of your site by reviewing the available technical literature for the area. References for your review need to include regional geologic maps, United States Geological Survey (USGS) technical reports and documents, Department of Water Resources (DWR) Bulletins, Regional Water Quality Control Board reports on the groundwater basin, data from contaminant investigations in the area, etc. Please provide: 1) a concise narrative discussion of the regional geologic and hydrogeologic setting, 2) figure(s) summarizing your findings, and 3) synthesis and interpretation of regional data with the site-specific data. We request that you appropriately reference your findings, and that you present photocopies of regional geologic maps, groundwater contour maps, cross-sections, etc., to illustrate your results. Please report your results in the workplan requested below.

##### 2) Conduit Study

Your June 3, 2003 investigation report, prepared by SOMA Environmental Engineering, Inc., did not include the required sensitive receptor and well surveys. ACEH requests that you locate all wells (monitoring and production wells: active, inactive, standby, decommissioned, abandoned and dewatering, drainage and cathodic protection wells) within 2,000 ft of the subject site. We recommend that you obtain well information from both Zone 7 Water Agency and the State of California Department of Water Resources, at a minimum. As part of your detailed well survey, please perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, which can act as pathways for migration of contamination at and/or from your site. Please review historical sources such as Sanborn maps,

aerial photos, etc., when performing the background study. Include appropriate photographic prints, in stereo pairs, of historic aerial photos used as part of your study. We also request that you list by date all aerial photographs available for the site from the aerial survey company or library you use during your study. Please refer to the Regional Board's guidance for identification, location, and evaluation of potential deep well conduits (attached) when conducting your preferential pathway study. Please report the results of your surveys in the workplan requested below.

### 3) Contaminant Plume Definition

SOMA's presentation and evaluation of hydrogeologic and contaminant distribution data in the June 3, 2003 investigation report is inadequate. SOMA's final product consists of the two cross-sections presenting soil conductivity and a series of maps depicting lateral distribution of contamination. The cross-sections and maps are insufficient for the following reasons:

- No effort was made to demonstrate correlation between the measured soil conductivity and the stratigraphy observed in soil boring S-1. There are apparent contradictions between the soil types logged in borehole S-1 and those inferred on the cross-sections. For example, SOMA reported silty sands at 5 and 18 ft bgs in boring S-1. The electrical conductivity of the silty sands was approximately 100 mS/m in the adjacent boring ECB-S. Cross-section B-B' contradicts the geologic log and suggests that "clay +/- silt" was encountered at these depths in this location.
- SOMA's charts of soil conductivity (Figures 5 and 6) are raw data plots. These charts are mis-labeled by SOMA as "cross-sections." Insufficient interpretation of this data is presented in the report. We request that you compile cross-sections which evaluate the relative permeabilities of the subsurface strata.
- Hydrogeologic and contaminant distribution evaluations need to be cumulative and include the lithologic and analytical data collected during previous investigations. As supporting documentation for your cross-sections, we require that photocopies of all boring logs available for the site be included as an appendix to the report.
- Cross-sections need to include plotted screening intervals and analytical results for all collected samples, as well as the subsurface locations of potential conduits and key UST system features.
- The isoconcentration maps presented by SOMA do not include interpolation of concentrations likely to be encountered between data points. Data evaluation is required. This deficiency in SOMA's report is misleading in that it incorrectly implies that groundwater contamination at the site occurs only at the sampled locations.

The results of your analyses are critical as they will be used to guide future investigation efforts. We request that you present revised and expanded evaluation of the investigation data as part of the rationale supporting your proposed future sampling plan. Please submit your evaluation and rationale in the workplan requested below.

### 4) Interim Remedial Action

SOMA's March 31, 2003 workplan states that ongoing sources(s) will be removed; however, the June 3, 2003 report presents no evaluation of potential ongoing sources. Based on the reported soil data, significant residual petroleum hydrocarbons are present in soil near samples B-7 and B-2b. The extent of soil contamination is undefined to the south of the fuel dispensers. We reiterate our request for evaluation of the need for interim remedial action, and we request that



you define the extent of vadose zone soil contamination at the site. Compilation of all historical data for the site needs to be part of your analysis. If additional sampling and/or interim remedial action is recommended, please submit a sampling plan outlining your proposed tasks in the workplan requested below.

#### 5) Migration Control

SOMA proposed groundwater flow and chemical transport modeling and a risk-based corrective action (RBCA) evaluation in their March 31, 2003 workplan. This effort does not appear to have been initiated. Prior to performing an aquifer test the existing site wells need to be replaced with appropriately screened monitoring wells. Advance replacement of the wells is necessary because aquifer parameters calculated from pumping tests on the existing wells would not be relevant to particular water bearing zones. In addition, further site investigation is necessary prior to performing fate and transport modeling, and a RBCA evaluation would be premature at this time. Please propose aquifer test procedures as part of the workplan requested below. At this time, we recommend that you perform a screening level assessment of potential on- and off-site risks to human health using the RWQCB-SFBR Environmental Screening Levels. Please include this screening-level evaluation in the workplan requested below.

#### 6) Site Characterization and Groundwater Investigation

We generally concur with the recommendations in SOMA's June 3, 2003 report. We request that you propose tasks to: i) replace the existing monitoring wells with appropriately screened wells, and thereby reduce the risk of vertical contaminant migration and improve the quality of your monitoring data; ii) define the vertical and lateral extent of groundwater contamination; and iii) perform preferential pathway sampling to further evaluate offsite contaminant migration.

### **TECHNICAL REPORT REQUESTS**

Please submit technical reports to Alameda County Environmental Health according to the following schedule:

- December 20, 2004 – Soil and Water Investigation (SWI) Workplan
- 90 days after Workplan Approval – SWI Report
- End of First Month of Each Quarter - Quarterly Monitoring Report covering the previous quarter's groundwater monitoring

ACEH makes this request pursuant to California Health & Safety Code Section 25296.10. CCR Title 23 Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to a reportable unauthorized release from a petroleum UST system, and require your compliance with this request.

#### Perjury Statement

All workplans and technical reports submitted to ACEH must be accompanied by a cover letter from the responsible party that states the following: "I declare under penalty of perjury, that the information and/or recommendations contained in the attached proposal 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.

#### Professional Certification

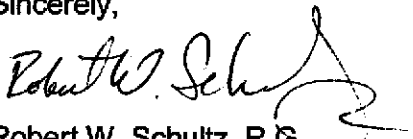
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that workplans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. Please note that 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. Work at your site is required to be designed, interpreted, and overseen by the appropriately registered professional.

#### **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 County District Attorney or other appropriate agency, for enforcement. California Health and Safety Code, Section 25299.76 authorizes ACEH enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Please call me at (510) 567-6719 with any questions regarding this case.

Sincerely,



Robert W. Schultz, R.G.  
Hazardous Materials Specialist

#### **Attachment**

cc: Matt Katen, Zone 7 Water District, QIC 80201  
Eugene Pak, Cambria Environmental Technology, Inc., 5900 Hollis St., Ste. A,  
Emeryville, CA 94608  
Donna Drogos, ACEH  
Robert Schultz, ACEH

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



April 9, 2003

RO 304

Mr. Hooshang Hadjian  
7240 Dublin Boulevard  
Dublin, CA 94568

Ms. Karen Streich  
Chevron Products Company  
P.O. Box 6004  
San Ramon, CA 94583

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

**Re: Chevron Station, 7240 Dublin Boulevard, Dublin**

Dear Ms. Streich and Mr. Hadjian:

This letter follows review of the December 5, 2002 SOMA Environmental Engineering, Inc. workplan for the continued assessment of the subject site, and related tasks. This workplan was subsequently revised January 22, 2003 and March 31, 2003 after input from this office and meetings with SOMA and Fisch Environmental, the subcontractor performing the expedited site assessment element of the intrusive investigation.

The investigation elements of the cited SOMA workplan, as revised, are acceptable for the current Soil and Water Investigation (SWI) phase of the project.

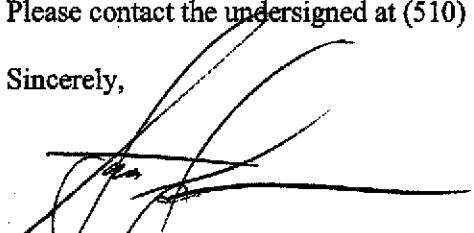
The **SWI Report**, which presents the results of the expedited site assessment work, is due within 110 days from the date of this letter.

The **SWI Completion Report**, which presents the final evaluation of the expedited site assessment work, a Site Conceptual Model (SCM), results of the revised Conduit Study, proposals for additional assessment tasks, as needed, and plume control measures, among other possible elements, is due within 180 days.

Within 90 days of the submittal of the SWI Completion Report, a **Corrective Action Plan** becomes due.

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

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

Ms. Streich and Mr. Hadjian  
Re: 7240 Dublin Blvd., Dublin  
April 9, 2003  
Page 2 of 2

cc: Betty Graham, RWQCB  
Shari Knieriem, SWRCB UST Fund  
Matt Katen, Zone 7 Water Agency  
Mansour Sepehr, SOMA Env., 2680 Bishop Dr., Ste. 203, San Ramon, CA 94583  
D. Drogos, R. Weston, ACDEH

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



10-22-02

RO0000304

October 21, 2002

Mr. Hooshang Hadjian  
Dublin Auto Wash  
7420 Dublin Blvd  
Dublin, CA 94568

Ms. Karen Streich  
Chevron Products  
P.O. Box 6004  
San Ramon, CA 94583-0804

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

**RE: SWI and CAP for 7420 Dublin Blvd, Dublin, CA**

Dear Mr. Hadjian and Ms. Streich:

I have completed review of the fuel leak case file for the above referenced site, including the most recent *Groundwater Monitoring and Sampling Report Second Quarter-- Event of May 22, 2002* report prepared by Gettler-Ryan Inc. I am concerned with the high levels of the gasoline oxygenate Methyl tert-Butyl (MTBE) at the site and the site's location within the recharge zone of the groundwater basin. This letter presents a request for full three-dimensional definition, investigation, and a proposal for cleanup of soil and water contamination from the unauthorized release at the site. You are hereby required to complete a Soil and Water Investigation (SWI) and prepare a 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 cleanup performance objectives that shall be considered as part of the require SWI and CAP. **We request that you prepare and submit a work plan for the SWI within 45 days of the date of this letter, or by December 6, 2002, that addresses each of the following comments.**

**TECHNICAL COMMENTS**

1. Conduit Study

A conduit and well survey was previously prepared for the site. You should verify the accuracy and completeness of the survey and provide a map(s) showing the location of all wells (monitoring and production wells: active, inactive, standby, destroyed, abandoned), surface water (creeks, flood control channels), and location and depth of all utility lines and trenches (sewer and storm drain lines) identified in the study.

Using the results of the conduit study and data from previous investigations at the site, you are to develop the initial three-dimensional conceptual model of site conditions. You are to use this initial conceptual model to determine the appropriate configuration for samplings 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. **You shall also evaluate the probability of the MTBE plume encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper drinking water aquifers and discuss this in the work plan.**

## 2. Contaminant Plume Definition

The purpose of contaminant plume definition is to determine the three-dimensional extent of contamination in soil and groundwater. Up to 140,000 ppb MTBE was detected in groundwater in May 2002. MTBE is more mobile in soil and groundwater than the typical petroleum hydrocarbon compounds, is highly soluble in groundwater, and is not readily biodegradable. MTBE plumes can be long, narrow, and erratic. Because of these characteristics, conventional investigation techniques and monitoring well networks currently used at fuel leak sites are generally insufficient to adequately characterize MTBE contamination. Therefore, it is recommended that you propose an investigation that will include depth discrete soil and groundwater sampling. Soil and groundwater samples should be collected at 5 feet intervals, areas of obvious contamination, the soil/groundwater interface, and at each unit of lithology change. It is recommended that your investigation incorporate expedited site assessment techniques and borings installed along transects to define and quantify the full three-dimensional extent of MTBE. The borings should be continuously cored. Detailed cross sections, fence diagrams, structural contours, isopachs, and rose diagrams for groundwater should be subsequently incorporated in the SWI completion report. Discuss your proposal for performing this work in the SWI work plan.

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.

## 3. Interim Cleanup

The purpose of interim cleanup is to immediately remove the ongoing source(s) that are continuing to add mass to the plume. Residual TPHg, BTEX, and MTBE exist in the vadose zone. The soil vapor extraction system should be re-activated **immediately** to remove residual hydrocarbon contamination that continues to add mass to the contaminant plume at the site. Results and effectiveness of the extraction system should be included in the SWI report.

## 4. Migration Control

The purpose of migration control is to stop plume migration, prevent nuisance conditions, and protect potential receptors, such as water supply wells, from being impacted. Due to the high levels of MTBE detected at the site, plume control is necessary. A proposal for plume migration control should be included in the SWI completion 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 for the entire contaminant plume and remedial alternative for soil and groundwater** that will adequately protect human health and safety, the environment, eliminate nuisance conditions, and protect water resources.

A CAP for the final cleanup of contamination in soil and groundwater caused by an unauthorized release at the site will be requested upon completion of the Soil and Water Investigation 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 must propose verification monitoring to confirm completion of corrective actions and evaluate CAP implementation effectiveness.

## TECHINCAL REPORT REQUEST

Please submit technical reports according to the following schedule:

**December 6, 2002** – Work plan for Soil and Water Investigation

**110 Days from Work Plan Approval** – Soil and Water Investigation (Results of Expedited Site Assessment) Report and results and evaluation of soil vapor extraction at the site

**180 Days from Submittal of Soil and Water Investigation Report** – Soil and Water Investigation Completion Report

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

**October 30, 2002** – Quarterly Report for the Third Quarter 2002

**January 30, 2003** – Quarterly Report for the Fourth Quarter 2002

**April 30, 2003** – Quarterly Report for the First Quarter 2003

These reports are being requested pursuant to the Regional Board's authority under Section 13267 of the California Water Code. **Each report shall include conclusions and recommendations for the next phases of work required at the site.** It is requested that all required work be performed in a prompt and timely manner. I have proposed a schedule for the submittal of the Soil and Water Investigation Report and the CAP. Revisions to the proposed 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 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.

### 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 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) 567-6762.



eva chu  
Hazardous Materials Specialist

c: James Parker, Parker Environmental, 190 East 7<sup>th</sup> Street, Pittsburg, CA 94565-2317  
Colleen Winey, Zone 7

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



9-13-07

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

RO0000304

September 12, 2001

Mr. Hooshang Hadjian  
Dublin Auto Wash  
7240 Dublin Blvd.  
Dublin, CA 94568

**RE: Soil Vapor Extraction at 7240 Dublin Blvd, Dublin, CA**

Dear Mr. Hadjian:

I have completed review of Delta Environmental's September 2001 *Soil Vapor Extraction System Review* report prepared for the above referenced site. The existing remediation system consists of perforated horizontal piping at 3 to 4 feet below grade. The existing system was designed to remove petroleum hydrocarbons from within the vadose zone in the vicinity of the tank basin and pump islands.

The most recent groundwater monitoring event (May 2001) identified 136,000ppb MTBE and 3,760ppb benzene in groundwater from well MW-3. At this time, soil vapor extraction should be re-started at the site to see if soil vapor extraction is effective in removing MTBE and benzene from the vadose zone. The existing catalytic oxidizer and vacuum pump compressor have not been used since 1996. These equipment may need to be replaced or repaired before use.

Please provide a time schedule for getting the remediation system online again. The time schedule is due within 30 days of the date of this letter, or **by October 15, 2001.**

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

eva chu  
Hazardous Materials Specialist

c: James Parker, 190 East 7<sup>th</sup> Street, Pittsburg, CA 94565-2317  
email: Tom Bauhs



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



20304

June 14, 2001

Mr. Hooshang Hadjian  
7240 Dublin Boulevard  
Dublin, California 94568

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

**Subject: Results of inspection**

Dear Mr. Hadjian,

A regulatory compliance inspection was performed on June 13, 2001 at Dublin Auto Wash, 7240 Dublin Boulevard, Dublin. Your contractor, Phil Rooms, of TankTek, facilitated the inspection. The purpose of the inspection was to determine compliance with conditions stated in the operating permit and with provisions in Title 23 and the California Health and Safety Code.

Currently, the Gilbarco monitoring system is configured to go into alarm if liquid is detected in the submersible turbine pump sumps (STPS). The monitoring system will not disable the turbine when a leak is detected. The permit conditions are established for this configuration. That means your staff must be vigilante about checking and understanding the meaning of alarms so that gasoline does not accumulate unnoticed in the STPP. The new permit forms you filed indicate that positive shutdown and fail safe are in place. I have edited the forms to indicate the actual configuration.

At the time of the inspection on September 19, 2000 the monitoring system was found to be configured for positive shutdown and fail safe operation. The permit conditions require you to obtain approval from this office before any monitoring system changes are made. You are not allowed to change the configuration without approval.

The three light bulbs on the monitoring console are burned out. Replace the bulbs and maintain the lights as designed to visually warn of fuel releases. The permit conditions require an annual integrity test of the pressurized piping and tests of the line leak detectors. The test results are required to be submitted to this office within 30 days of the testing.

The spill response plan you submitted contains an improper procedure for managing a fuel spill. In the plan your staff is directed to place fuel contaminated absorbent into a plastic bag and then dispose to the dumpster. That procedure is **not allowed** and **shall be removed** from your response plans immediately. The contaminated absorbent shall be placed in a metal can with a tight fitting lid and used until no longer effective. All disposals of absorbent shall be made in accordance with hazardous waste laws and regulations.

Please forward documentation to show compliance with the above within 30 days. If you have any questions regarding the inspection I can be reached at (510) 567-6781.

Sincerely,

Robert Weston  
Sr. Hazardous Materials Specialist

enclosure

Cc: Susan Hugo, Manager, ACDEH

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



PO304

June 14, 2001

Mr. Hooshang Hadjian  
7240 Dublin Boulevard  
Dublin, California 94568

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

**Subject: Results of inspection**

Dear Mr. Hadjian,

A regulatory compliance inspection was performed on June 13, 2001 at Foothill Beacon, 16210 Foothill Boulevard, San Leandro. Your contractor, Phil Rooms, of TankTek, facilitated the inspection. The purpose of the inspection was to determine compliance with conditions stated in the operating permit and with provisions in Title 23 and the California Health and Safety Code.

Currently, the Veeder Root TLS 350 monitoring system is configured to shut down the turbines if liquid is detected in the submersible turbine pump sumps (STPS). The monitoring system will also de-energize the turbines if power to the monitor is turned off, fail safe operation.

The three light bulbs on the monitoring console are burned out. Replace the bulbs and maintain the lights as designed to visually warn of fuel releases.

The spill response plan you submitted contains an improper procedure for managing a fuel spill. In the plan your staff is directed to place fuel contaminated absorbent into a plastic bag and then dispose to the dumpster. That procedure is **not allowed and shall be removed** from your response plans immediately. The contaminated absorbent shall be placed in a metal can with a tight fitting lid and used until no longer effective. All disposals of absorbent shall be made in accordance with hazardous waste laws and regulations.

Please forward documentation to show compliance with the above within 30 days. If you have, any questions regarding the inspection I can be reached at (510) 567-6781.

Sincerely,

Robert Weston  
Sr. Hazardous Materials Specialist

enclosure

Cc: Susan Hugo, Manager, ACDEH

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



4-30-01

✓ R00000304

April 27, 2001

Mr. Tom Bauhs  
Chevron Products  
P.O. Box 6004  
San Ramon, CA 94583-0804

Mr. Hooshang Hadjian  
Dublin Auto Wash  
7240 Dublin Blvd  
Dublin, CA 94568

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

**SECOND NOTICE OF VIOLATION**

Dear Messrs. Bauhs and Hadjian:

On December 18, 2000, the Alameda County Department of Environmental Health, Hazardous Materials Division, sent you a letter requesting that groundwater monitoring be resumed at **7240 Dublin Blvd., Dublin, CA.** As of the date of this letter, however, we have not received any groundwater monitoring reports from you since April 2000. Therefore, this letter constitutes a **Second Notice** that you are in violation of specific laws and that the technical report is due.

According to Section 25298 of the California Health and Safety Code, underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge. Therefore, you, as the responsible party, are in violation of this section of the Code.

You are required to submit the quarterly groundwater monitoring reports for the site to this office **within 30 days** from the date of this letter. **Failure to respond may result in referral of this case to the RWQCB or Alameda County District Attorney to consider for enforcement action. Modification of required tasks or extensions of stated deadlines must be confirmed in writing by either this agency or the RWQCB.**

Be advised that failure to be in compliance with corrective action directives may jeopardize your eligibility to remain in the UST Cleanup Fund.

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

eva chu  
Hazardous Materials Specialist

email: Ben Heningburg (Delta Environmental)  
Deanna Harding (Gettler-Ryan)

chevron2582-15

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



12-19-00

20304

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

StID 3841

December 18, 2000

Mr. Tom Bauhs  
Chevron  
P.O. Box 5004  
San Ramon, CA 94583-0804

Mr. Hooshang Hadjian  
Dublin Auto Wash  
7240 Dublin Blvd.  
Dublin, CA 94568

**RE: Groundwater Sampling Frequency at Former Chevron Station 9-2582,  
7240 Dublin Blvd., Dublin, CA**

Dear Messrs. Bauhs and Hadjian:

In a recent conversation with Mr. Ben Heningburg of Delta Environmental, there appears to be a misunderstanding on the groundwater sampling frequency at the above referenced site. This letter is to clarify the groundwater monitoring frequency. Upon review of the historic groundwater analytical results, it was determined that groundwater monitoring wells EA-1, MW-2 and MW-3 should be sampled quarterly; wells EA-3 and MW-1 should be sampled semi-annually (1<sup>st</sup> and 3<sup>rd</sup> quarters); and wells EA-2, MW-4, and MW-5 should be sampled annually (1<sup>st</sup> quarter).

Please adhere to the above sampling frequency until further notice. If you have any questions, I can be reached at (510) 567-6762.

eva chu  
Hazardous Materials Specialist

email: Ben Heningburg ([bheningburg@deltaenv.com](mailto:bheningburg@deltaenv.com))  
Deanna Harding ([deanna@grinc.com](mailto:deanna@grinc.com))

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



11-2-00

PO304

StID 3841

November 1, 2000

Mr. Tom Bauhs  
Chevron USA  
P.O.Box 5004  
San Ramon, CA 94583-0804

Mr. Hooshang Hadjian  
Dublin Auto Wash  
7240 Dublin Blvd  
Dublin, CA 94568

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

**RE: QMR and Free Product Removal Report for 7240 Dublin Blvd., Dublin, CA**

Dear Messrs. Bauhs and Hadjian:

This office is not in receipt of a quarterly groundwater monitoring report (QMR) for the above referenced site since the sampling event conducted in February 2000. Be reminded that this site is still on quarterly monitoring. QMRs are due within 90 days upon completion of field activities.

Elevated levels of MTBE, which are of concern, were identified in March 1995. At that time up to 64,000ppb MTBE was identified. In February 1997, a leak in a stainless steel flex hose to the #2 dispenser was discovered. New piping and hoses were subsequently installed. Free product was detected in Well MW-3. A bailer was used to conduct interim product removal. This office is not in receipt of free product removal reports since August 1999. Please be reminded that monthly progress reports of product removal are past due.

**Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). And, failure to be in compliance with corrective action directives may jeopardize your eligibility to remain in the UST Cleanup Fund.**

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

eva chu  
Hazardous Materials Specialist

c: Shari Knieriem, SWRCB Cleanup Fund  
James Parker, 190 East 7<sup>th</sup> Street, Pittsburg, CA 94565-2317

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0304

ENVIRONMENTAL HEALTH SERVICES

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

StID 3841

July 9, 1999

Mr. Brett Hunter  
Chevron USA  
P.O.Box 5004  
San Ramon, CA 94583-0804

Mr. Hooshang Hadjian  
Dublin Auto Wash  
724Q Dublin Blvd  
Dublin, CA 94568

**RE: CAP Approval for 7240 Dublin Blvd, Dublin, CA**

Dear Messrs. Hunter and Hadjian:

I have completed review of Parker Environmental Services' June 1999 *Corrective Action Plan for Floating Product in MW-3* prepared for the above referenced site. The proposal to remove free product from well MW-3 with a bailer and electric submersible pump as an interim measure is acceptable. If product levels are not reduced, a skimmer with a pneumatic pump will be installed.

The proposed corrective action plan (CAP) should be implement immediately. A report on the effectiveness of product removal is due monthly until product levels are reduced and no longer measurable.

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

eva chu  
Hazardous Materials Specialist

c: James Parker  
190 East 7<sup>th</sup> Street  
Pittsburg, CA 94565-2317

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO#304

StID 3841

April 12, 1999

Mr. Brett Hunter  
Chevron USA  
P.O.Box 5004  
San Ramon, CA 94583-0804

Mr. Hooshang Hadjian  
Dublin Auto Wash  
7240 Dublin Blvd  
Dublin, CA 94568

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

**RE: Corrective Action Plan for 7240 Dublin Blvd, Dublin, CA**

Dear Messrs. Hunter and Hadjian:

I have reviewed the case file and the recently submitted *4<sup>th</sup> Quarter 1998 Monitoring* report for the above referenced site. In December 1998, for the first time, groundwater from well MW-3 contained 0.10 foot of free product. Groundwater from this well is showing an increase in TPHg and MTBE concentrations.

At this time, pursuant to Section 2721 et seq. of Article 11, Title 23, California Code of Regulations, you are hereby requested to develop a Corrective Action Plan (CAP) for further investigation of this site, and to identify and evaluate all feasible alternatives for free product removal and cleanup of soil and groundwater, both on- and off-site, caused by the unauthorized release of petroleum products.

**The referenced CAP is due in this office within 45 days of the date of this letter.** Include a time schedule for the completion of each aspect of the remediation process, as well as a proposal for the determination of the lateral extent of soil contamination at this site. The latter was requested in January 1998 and to date this office is not in receipt of the requested workplan.

This office strongly urges that you, the responsible parties, meet to discuss and allocate responsibility for the submittal of the CAP and subsequent quarterly monitoring reports. Also, you may consider adding Mr. Hadjian as a co-claimant to the UST Clean Up Fund.

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

eva chu  
Hazardous Materials Specialist

chevron2582-10

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO304

StID 3841

June 29, 1998

Mr. Brett Hunter  
Chevron USA  
P.O.Box 5004  
San Ramon, CA 94583-0804

Mr. Hooshang Hadjian  
Dublin auto Wash  
7240 Dublin Blvd  
Dublin, CA 94568

ENVIRONMENTAL HEALTH SERVICES

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

**SECOND NOTICE OF VIOLATION**

Dear Messrs. Hunter and Hadjian :

On January 2, 1998, the Alameda County Department of Environmental Health, Hazardous Materials Division, sent you a letter requesting that a work plan for the determination of the extent of soil and water contamination both north and west of the northwest dispenser at **7240 Dublin Blvd, Dublin, CA**. In addition, quarterly monitoring of the onsite groundwater monitoring wells was to be reinstated for the site. As of the date of this letter, however, we have not received any communication from you on this matter. Therefore, this letter constitutes a **Second Notice** that you are in violation of specific laws and that the technical report is due.

According to Section 25298 of the California Health and Safety Code, underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge. Therefore, you, as the responsible parties are in violation of this section of the Code, for which Section 25299 specifies civil penalties of up to \$5,000, for each day of violation, upon conviction. Also, failure to furnish technical reports regarding documented or potential groundwater contamination violates Section 13267(b) of the California Water Code.

You are required to submit the technical reports for the site to this office **within 45 days** from the date of this letter. **Failure to respond will result in referral of this case to the RWQCB or Alameda County District Attorney to consider for enforcement action. Modification of required tasks or extensions of stated deadlines must be confirmed in writing by either this agency or the RWQCB.**

Be advised that failure to be in compliance with corrective action directives may jeopardize your eligibility to remain in the UST Cleanup Fund.

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

eva chu  
Hazardous Materials Specialist



ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RO# 304

StID 3841

January 2, 1998

Mr. Brett Hunter  
Chevron USA  
P.O. Box 5004  
San Ramon, CA 94583-0804

Mr. Hooshang Hadjian  
Dublin Auto Wash  
7240 Dublin Blvd  
Dublin, CA 94568

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

**RE: Additional Investigations at 7240 Dublin Blvd, Dublin, CA**

Dear Messrs. Hunter and Hadjian:

In July 1997, during the replacement of the fuel dispensers and underground piping at the above referenced site, soil samples collected from limited overexcavation near the northwest dispenser and from hand-augered borings contained elevated TPHg, benzene, and MTBE.

At this time additional investigations are required to delineate the extent of soil contamination both north and west of the northwest dispenser. In addition, quarterly groundwater monitoring must resume for the site. The last monitoring report we are in receipt of is for sampling performed in March 1997.

A workplan for additional work is due to this office within 45 days or by **February 18, 1998**. A quarterly monitoring report is also due within 60 days of the date of this letter.

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

Should you have any questions about the content of this letter, please contact me at (510) 567-6762.

eva chu  
Hazardous Materials Specialist

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

R0304

ENVIRONMENTAL HEALTH SERVICES

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

July 21, 1997

ATTN: Bryce Rushhaupt

C A Petroleum Equipment  
P O Box 9364  
Fresno CA 93792

RE: Project # 564B - Type MOD  
at 7240 Dublin Blvd in Dublin 94568

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$700.00, payable to Alameda County, Environmental Health Services.

We must receive this deposit so that future regulatory oversight on the subject site can proceed in a timely fashion. At the completion of this project, any unused monies will be refunded to you or your designee.

The deposit refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$94 per hour.


Please be sure to write the following on the check to identify your account:

- project #,
- type of project and
- site address

(see RE: line above).

If you have any questions, please contact Rob Weston at (510) 567-6781.

Sincerely,

  
Ariu Levi, Manager  
Environmental Protection

c: files/inspector

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RO# 304

StID 3841

May 30, 1997

Mr. Brett Hunter  
Chevron USA  
P.O. Box 5004  
San Ramon, CA 94583-0804

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

Mr. Hooshang Hadjian  
Dublin Auto Wash  
7240 Dublin Blvd  
Dublin, CA 94568

**RE: Comments on Low Risk Fuel Site Evaluation at Former Chevron Station #9-2582, 7240 Dublin Blvd, Dublin, CA**

Dear Messrs. Hunter and Hadjian:

I have completed review of Weiss Associates' December 19, 1996 Low Risk Fuel Site Evaluation report for the above referenced site. The environmental conditions were reviewed to determine if continued operation of the soil vapor extraction system is justified and whether case closure is appropriate.

When Chevron closed the site in 1989, the USTs were removed and ~1,300 cy of hydrocarbon-impacted soil was excavated. A soil vapor extraction system (SVE) operated from March 1992 until April 1996, removing over 15,000 pounds of hydrocarbons. Despite the remediation efforts TPHg and MTBE concentrations are increasing in wells EA-1 and MW-3, suggesting that a recent fuel release has occurred.

Based on the recent findings case closure cannot be granted at this time. Nor can the SVE system be dismantled. A corrective action plan has been requested to address the release of MTBE to the subsurface. It may become necessary to modify the SVE for the remediation of MTBE.

As the responsible parties both your cooperations will be required throughout the investigations which will be required until this case can be closed. If you have any questions, I can be reached at (510) 567-6762.

eva chu  
Hazardous Materials Specialist

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RO# 304

May 23, 1997

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

Hooshang Hadjian  
Dublin Auto Wash  
7240 Dublin Blvd.  
Dublin, CA 94568

**NOTICE OF VIOLATION**

Dear Mr. Hadjian:

On March 10, 1997 Eva Chu and I visited your station and met with you. The reason for the inspection was to attempt to determine the source of elevated levels of petroleum hydrocarbons in groundwater monitoring wells on your site. Upon arriving you stated that Gettler-Ryan was making repairs to underground piping at one of the dispenser connections. The scope of work included piping integrity tests and replacement of a damaged flexible connection found during the testing. The repairs to the tank system were performed without the required approval of this office.

This is the second documented occasion that work has been performed on the tank system without the approval of this office. Product dispensers were replaced on or about April 25, 1995 after a warning was issued to you on April 24, 1995. You are in violation of section 2661(b) and 2712(c) of the California Code of Regulations (CCR). Approval by this office is required prior to any repairs or modifications to the underground tank system. All conditions of the operating permit shall be met in order to legally operate in compliance with laws and regulations governing underground storage tanks (USTs).

The failure of the primary piping caused an unauthorized release to the environment. As of today a written report has not been submitted. You are in violation of section 25295 of the California Health and Safety Code and Section 2652(c) of CCR. A written report is required within five (5) working days of the discovery of an unauthorized release. Submit the written report including actions to be taken to eliminate the possibility of further releases to this office by May 30, 1997.

According to the available documents in your file the required annual testing of piping and mechanical line leak detectors has

Dublin Auto Wash  
May 23, 1997  
page 2

not been performed since the original installation in 1989. You are in violation of section 2636(f)(4) and 2712(c) of the CCR for failure to annually test the piping at 150% of normal operating pressure with a release rate equivalent of 0.1gph and to certify the operation of the mechanical line leak detectors. The testing is required in the permit conditions for the operation of the USTs. Monitor and sensor certification has only been performed once in the life of the USTs. The certification is dated May 1, 1995. The certification is required annually.

This tank system lacks secondary containment on the piping as required by section 2636(a) CCR. The secondary piping terminates at the transition near the dispensers. The secondary piping bells down to a flexible line as shown in the blueprints. The construction of the piping was confirmed in a telephone conversation with Denny at Gettler-Ryan.

As discussed by telephone on May 22, you stated that the piping will be upgraded as soon as a contractor has been selected. All work will be approved by this office, with oversight provided on all phases of the upgrade.

The hazardous materials business plan sent to your site in late 1996 has not been submitted. The completed plan was due on March 1, 1997. Please complete and submit the plan no later than June 6, 1997.

Eva Chu and I will be working with you to resolve the issues and violations at the station. The violations documented in this letter are considered serious failures in your operation of the USTs and increase the risk of environmental contamination. Please contact me at (510) 567-6781 if you have questions or comments on these issues.

Sincerely,



Robert Weston  
Sr. Hazardous Materials Specialist

enclosures

c: Eva Chu, Hazardous Materials Specialist  
Ariu Levi, Manager, ACDEH  
Tom Peacock, Manager, ACDEH  
Iver Hilde, property owner, 6500 Village Parkway, Dublin CA  
94568

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#304

StID 3841

May 15, 1997

Mr. Brett Hunter  
Chevron USA  
P.O. Box 5004  
San Ramon, CA 94583-0804

ENVIRONMENTAL HEALTH SERVICES

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

Mr. Hooshang Hadjian  
Dublin Auto Wash  
7240 Dublin Blvd  
Dublin, CA 94568

RE: CAP for 7240 Dublin Blvd, Dublin, CA

Dear Messrs. Hunter and Hadjian:

A review of the cumulative groundwater data for the above referenced site reveals that MTBE has been detected in groundwater since March 1995, when analysis for MTBE was initiated in response to a request by this agency. MTBE has been detected in well MW-3 in concentrations ranging from 3,100ppb to 100,000ppb. And, well MW-2, located approximately 20' from Martin Canyon Creek, an engineered flood control channel, has identified MTBE levels ranging from 120ppb to 3,100ppb.

On March 10, 1997, during a site visit, it was observed that recent repairs were made at one of the fuel dispenser island. A portion of a hose below the dispenser was twisted and damaged. An unknown amount of fuel was released to the subsurface soil before the the damaged hose was replaced. The enclosed Underground Storage Tank Unauthorized Release (Leak)/Contamination Site Report must be completed and returned to this office within 10 days.

At this time pursuant to Section 2721 et seq. of Article 11, Title 23, California Code of Regulations, you are hereby requested to develop a Corrective Action Plan (CAP) for further investigation of this site, and to identify and evaluate all feasible alternatives for cleanup of soil and groundwater, both on- and off-site, caused by the unauthorized release of MTBE. The CAP is due to this office within 60 days of the date of this letter, or by July 18, 1997.

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

Lastly, this office is not in receipt of any groundwater monitoring reports (QMRs) since October 1996. Quarterly monitoring should continue for this site and QMRs submitted for review on a quarterly basis.

Messrs Hunter and Hadjian  
re: CAP for 7240 Dublin Blvd  
May 15, 1997

Page 2

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



eva chu  
Hazardous Materials Specialist

c: Robert Weston, ACDEH  
David Lunn, Zone 7

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO# 304

ENVIRONMENTAL HEALTH SERVICES

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

StID 3841

June 13, 1996

Mr. Brett Hunter  
Chevron USA  
P.O. Box 5004  
San Ramon, CA 94583-0804

**RE: Technical Reports for Former Chevron Station 9-2582,  
7240 Dublin Blvd, Dublin, CA 94568**

Dear Mr. Hunter:

This office has not received any current quarterly monitoring reports (QMRs) since the March 1995 sampling event for the above referenced site. Nor have we received a monitoring well installation report for the two offsite wells installed in December 1995.

Reports and QMRs should be submitted within 60 to 90 days upon completion of field activities. The referenced reports are due within 30 days of the date of this letter, **or by July 14, 1996.**

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

eva chu  
Hazardous Materials Specialist

c: files



ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

R0304  
RAFAT A. SHAHID, DIRECTOR

Alameda County Environmental Health Dept.  
Environmental Protection Division  
1131 Harbor Bay Parkway, Room 250  
Alameda CA 94502-6577  
(510)567-6700 fax: (510)337-9335

StID 3841

November 29, 1995

Mr. Brett Hunter  
Chevron USA  
P.O. Box 5004  
San Ramon, CA 94583-0804

RE: Workplan Approval for Former Chevron Station 9-2582,  
7240 Dublin Blvd, Dublin 94568

Dear Mr. Hunter:

I have completed review of Gettler-Ryan Inc's (G-R) October 1995 Well Installation Workplan for the above referenced site. The proposal to install two off-site groundwater monitoring wells is acceptable. As discussed with Ms. Barbara Sieminski of G-R, the placement of proposed well MW-4 will be moved approximately 65' southwest, toward the entrance of the McDonald's driveway, and proposed well MW-5 may be moved, pending site conditions at the time of field work.

Please notify me at least 72 hours prior to the start of field activities. If you have any questions, I can be reached at (510) 567-6762.

eva chu  
Hazardous Materials Specialist

cc: Barbara Sieminski, Gettler-Ryan, 6747 Sierra Ct, Suite J,  
Dublin 94568  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0304

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6700

StID 3841

July 28, 1995

Mr. Brett Hunter  
Chevron USA  
P.O. Box 5004  
San Ramon, CA 94583-0804

RE: Offsite Investigation for Former Chevron Station 9-2582,  
7240 Dublin Blvd, Dublin 94568

Dear Mr. Hunter:

Thank you for the submittal of the two recent quarterly monitoring reports of sampling events which took place in November 1994 and March 1995. Wells MW-1, MW-2, and MW-3, at the edge of the property, all exhibited elevated levels of petroleum hydrocarbons. It appears an offsite investigation is warranted. Please submit a workplan for this phase of the investigation to this office within 45 days of the date of this letter, or by **September 20, 1995.**

Also, we are not in receipt of any reports documenting the effectiveness of the remediation system since December 1993. If the system is no longer effective, then alternative technologies for cleanup should be explored. Please keep me informed of any ongoing remediation activities at this site on a semi-annual basis.

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

eva chu  
Hazardous Materials Specialist

cc: files

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0304

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 3841

July 7, 1994

Mr. Brett Hunter  
Chevron USA  
P.O.Box 5004  
San Ramon, CA 94583-0804

RE: **Workplan Approval for Chevron #9-2582, 7240 Dublin Blvd,  
Dublin 94568**

Dear Mr. Hunter:

I have completed review of Groundwater Technology's June 1994 Work Plan for Additional Soil and Groundwater Assessment for the above referenced site. The proposal to install three additional monitoring wells downgradient from the former tank pit is acceptable. Groundwater samples from these wells should be analyzed for MTBE, in addition to TPH-G and BTEX. Field work should commence by **August 29, 1994**. Please notify this office at least 72 hours prior to the start of field activities.

This office has moved to: 1131 Harbor Bay Parkway, 2nd Floor, Alameda, CA 94502. Phone lines are not yet connected, but I may be reached at (510) 271-4330. Please do not hesitate if you have any questions.

Sincerely,

eva chu  
Hazardous Materials Specialist

cc: Jason Fedota, GTI, 1401 Halyard Dr, Suite 140, West  
Sacramento, Ca 95691  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0304

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 3841

May 18, 1994

Mr. Brett Hunter  
Chevron USA  
P.O.Box 5004  
San Ramon, CA 94583-0804

**Subject: Additional Investigation at Chevron Station 9-2582,  
7240 Dublin Blvd, Dublin 94568**

Dear Mr. Hunter:

I have completed review of Blaine Tech Services Inc's 4th Quarter 1993 and 1st Quarter 1994 Groundwater Monitoring reports for the above referenced site. Sufficient groundwater elevation data is now available to verify that flow direction fluctuates from the east, southeast to the northwest. This being the case, additional investigations are required to delineate the extent of the groundwater contaminant plume west, northwest of the former tank pit and pump island. Please submit a workplan for this investigation within 45 days of the date of this letter.

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

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

Sincerely,

A handwritten signature in cursive script, appearing to read 'eva chu'.

eva chu  
Hazardous Materials Specialist

cc: files

chvround2.1

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0304

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

May 19, 1993

Mr. Hooshang Hadjian  
Dublin BP Auto Wash  
7240 Dublin Blvd.  
Dublin, CA 94568

**\*\*\* NOTICE OF VIOLATION \*\*\***

**Re: BP STATION LOCATED AT 7240 DUBLIN BLVD, DUBLIN.**

Dear Mr. Hadjian:

Our records indicate that there are three underground storage tanks (UST's) located at the above facility. You are required by law to EITHER PERMIT OR REMOVE THESE UST'S.

In accordance with the California code of Regulations, Title 23, Chapter 3, Subchapter 16 Underground Tank Regulations one of the following actions must be taken:

1. Submit a tank closure plan to this Department as required by Article 7, 2670(b) forms available from this office, or
2. Apply for a permit as required by Article 10, 2711 and 2712. Permit application Part A and B are available from this office.

Please note that section 25299 of the California Health and Safety Code states that any operator or owner of an underground storage tank is liable for a civil penalty of not less than \$500 or more than \$5,000 per day for failure to obtain a permit, or failing to properly close an underground storage tank, as required by section 25298.

Within 15 days, contact this office with your decision. Furthermore, if you plan to submit an application for a UST operating permit, your permit must be submitted within 30 days.

If you have any further questions, contact me directly at: (510)  
271-4320.

Sincerely,

A handwritten signature in cursive script that reads "Jeff Shapiro". The signature is written in dark ink and is positioned above the typed name.

Jeff Shapiro  
Hazardous Materials Specialist

C: Gil Jensen, Alameda County District Attorney

**ALAMEDA COUNTY  
HEALTH CARE SERVICES**

**AGENCY**

DAVID J. KEARS, Agency Director



**R0304**

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

August 29, 1991

Mr. Reza Ziaei  
Dublin Auto Wash  
7240 Dublin Blvd.  
Dublin, CA 94568

**Subject: Five-Year Permit to operate three underground tanks at  
7240 Dublin Blvd., Dublin CA 94568**

Dear Mr. Ziaei:

This office has received the materials requested in the August 20, and July 22, 1991 letters. Thank you for your prompt attention to this matter. However, the routine monitoring plan and emergency spill/leak response plan are incomplete. The following additional information is required:

**Routine monitoring plan:**

- a. Discussion of the 'red jacket' in-line leak detectors for the piping.
- b. The routine maintenance, testing, and calibration procedures for the in-line leak detectors and the BW Autostick 950. Be sure to include information on the probes. These procedures should be in accordance with the manufacturer's instructions.
- c. Identification of the person(s) responsible for performing routine maintenance, and the training they have received in order to do it.
- d. A schedule for the routine maintenance, and the reporting format that will be used to keep records that it was done.

Mr. Reza Ziaei  
August 29, 1991  
Page 2 of 2

Spill/leak response plan:

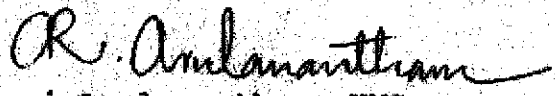
- a. Indicate the business hours for which Cottle Industries will respond to a phone call, and show the types and availability of equipment they can provide.
- b. Provide a contingency response plan (response company) in the event that Cottle Industries might be unavailable.
- c. Demonstrate that you will be able to distinguish between fuel and water leaks into the interstitial space. Also, provide a response plan in the event of a breach of the secondary containment.

Please submit the revised plans by September 9, 1991. A five year permit will be issued when the above requirement is met.

You are again reminded that failure to respond in a timely manner could result in civil liabilities under Division 20, Chapter 6.7, Section 25299 of the Health and Safety Code, of not less than five hundred dollars (\$500) or more than five thousand dollars (\$5000) for each underground storage tank for each day of violation.

Should you have any questions regarding this letter, please contact me or Cathy Gates at (415) 271-4320.

Sincerely,



Ravi Arulanantham, HMS  
Hazardous Materials Division

cc: Tom Hatcox, Dougherty Regional Fire District  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
files

RA:CG:cj men31



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0304

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

August 20, 1991

Mr. Reza Ziaei  
Dublin Auto Wash  
7240 Dublin Blvd.  
Dublin, CA 94568

**Subject: Five-Year Permit to operate three underground tanks at  
7240 Dublin Blvd., Dublin CA 94568**

Dear Mr. Ziaei:

This letter is being sent to follow-up a phone call to our office from Zane Millsen on August 14, 1991. The issue discussed was item #3 of the 'Second Notice of Violation' for the above facility dated July 22, 1991, which required annual testing of pressurized piping. Please be advised that this agency will not require annual piping tightness tests at this facility for valid underground tank operating permits.

Please note, however, that documents requested for the other requirements of the 'Second Notice of Violation' were due no later than August 19, 1991. These documents are now overdue, and must be submitted within 7 days. These documents include:

- A. Three Part B permit application forms. (one for each tank.)
- B. A written routine monitoring plan.  
This plan must include: the equipment and methods used for monitoring, the frequency with which each method is performed, the name(s) and title(s) of the person(s) responsible for performing monitoring and for maintaining the equipment, and the reporting format used to keep monitoring records.
- C. A written spill/leak response plan.  
This plan should demonstrate that in the event of an unauthorized release, product would be removed from the secondary container within the shortest possible time. It should include at least the following:

Mr. Reza Ziaei  
August 20, 1991  
Page 2 of 2

- a) A description of the proposed methods and equipment to be used for removing the gasoline, including the location and availability of the required equipment if not located permanently on-site, or the equipment maintenance schedule if it is located on-site.
- b) The name(s), title(s), and phone number(s) of the person(s) authorizing the work to be performed.

A five year permit will be issued when the above requirements are met.

You are again reminded that failure to respond in a timely manner could result in civil liabilities under Division 20, Chapter 6.7, Section 25299 of the Health and Safety Code, of not less than five hundred dollars (\$500) or more than five thousand dollars (\$5000) for each underground storage tank for each day of violation.

Should you have any questions regarding this letter, please contact Cathy Gates at (415) 271-4320.

Sincerely,



Ravi Arulanantham, HMS  
Hazardous Materials Division

cc: Tom Hatcox, Dougherty Regional Fire District  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
files

RA:CG:cg mem30

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0304

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

Certified Mailer #: P 367 604 319

July 22, 1991

Mr. Reza Ziaei  
Dublin Auto Wash  
7240 Dublin Blvd.  
Dublin, CA 94568

**SECOND NOTICE OF VIOLATION**

Dear Mr. Ziaei:

As you are aware, On July 19, 1991, Cathy Gates from our office inspected the above premises with regard to issuance of a 5-year permit to operate three underground storage tanks. During the inspection, you were provided with three blank Part B permit application forms to complete and submit to this office. The Part A application was filled out and submitted during the inspection.

On May 2, 1990, you were sent a Notice of Violation by Gil Wistar in our office. This letter listed requirements with which your facility was not in compliance with Title 23, California Code of Regulations (CCR) and California Health and Safety Code (H&SC) for operation of underground tanks.

During the inspection by Ms. Gates, you made changes on our office's copy of pre-installation plans to indicate the changes made during construction in pipe and dispenser locations. These plans now suffice as our as-built documents. It is also noted that you have submitted a facility business plan (Hazardous Material Management Plan). However, the following violations still exist:

- 1) Section 2632(d)(1), 2634(d)(2), Title 23, CCR - No written routine monitoring plan has been submitted to this agency. This plan must include: the equipment and methods used for monitoring, the frequency with which each method is performed, the name(s) and title(s) of the person(s) responsible for performing monitoring and for maintaining the equipment, and the reporting format used to keep monitoring records.
- 2) Section 2632(d)(2), Title 23, CCR - No written spill/leak response plan has been submitted to this agency. This plan should demonstrate that in the event of an

Mr. Reza Ziaei  
July 22, 1991  
Page 2 of 2

unauthorized release, product would be removed from the secondary container within the shortest possible time. It should include at least the following:

- a) A description of the proposed methods and equipment to be used for removing the gasoline, including the location and availability of the required equipment if not located permanently on-site, or the equipment maintenance schedule if it is located on-site.
- b) The name(s), title(s), and phone number(s) of the person(s) authorizing the work to be performed.

Additionally, you must comply with the following:

- 3) Section 25291(f) H&SC - All pressurized piping must be tightness tested annually. Please note that results of the annual pipeline test should be sent to our office within 30 days after the test and records maintained on-site for at least three years.

Please submit the monitoring plan, the spill/leak response plan, and the results of the first annual pipeline test to this office by August 19, 1991. Failure to respond in a timely manner could result in civil liabilities under Division 20, Chapter 6.7, Section 25299 of the Health and Safety Code, of not less than five hundred dollars (\$500) or more than five thousand dollars (\$5000) for each underground storage tank for each day of violation.

Should you have any questions regarding this letter, please contact Cathy Gates at (415) 271-4320.

Sincerely,



Ravi Arulanantham, HMS  
Hazardous Materials Division

cc: Tom Hatcox, Dougherty Regional Fire District  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
files

RA:CG:cg mem6

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0304

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

February 26, 1991

Janie Layton  
Bechtel Environmental, Inc.  
P.O. Box 193965  
San Francisco, CA 94119-3965

RE: File Search for BART

Dear Ms. Layton:

Below is a summary of our findings in response to your letter dated January 30, 1991.

1. Hacienda Business Park, Pleasanton:  
Several firms in vicinity that generate hazardous waste. However, this office currently has no record of "toxic incidents" or tank leaks in this area, except for the following: On Thanksgiving Day 1988, a chemical truck overturned on I-580 between the I-680 and Hopyard Road interchanges, causing traffic to be backed up for about 15 hours, as the released chemicals were identified and cleaned up. The spill occurred on eastbound I-580, when a truck carrying such chemicals as hydrogen peroxide, sulfuric acid, acetone etc., was overturned. Several unknown containers of chemicals were spilled (volumes unknown). Diesel and engine oil from the rig spilled off the south side of the highway onto the shoulder. About 1500 gallons of an oil/water mixture were pumped into a tank truck and hauled away. In addition, all contaminated soil and debris was collected and hauled away as a hazardous waste.
2. Enea Business Plaza Center, Dublin:  
This office currently has no files on any "toxic incidents" at this site.  
(#20845 Wilbeam Ave)
3. Sal's Foreign Car Services, 20834 Wilbeam Ave./ 3343 Castro Valley Blvd., Castro Valley:  
On August 30, 1990, one 3000 gallon and two 1000 gallon underground gasoline tanks were removed. Soil and shallow groundwater sampling revealed that both soil and water was

(R0549)

Janie Layton  
Bechtel Environmental, Inc.  
February 25, 1991  
Page 2 of 4

contaminated (TPH-soil-720PPM and Product "Sheen" on ground water). This office has requested a Preliminary Site Assessment (PSA) report and the dead line for the submittal of PSA is March 15, 1991.

4. Crown Chevrolet, 7544 Dublin Blvd., Dublin:  
Our records indicate that two 1000 gallon underground tanks were installed in 1968. Two additional tanks were later installed in 1986. We have no records indicating what happened to the two tanks that were installed in 1968. However, a letter to the RWQCB from the Alameda County Flood Control and Water District - Zone 7 indicates that on July 25, 1986 a clerk of the city of Dublin has notified the Zone 7 office of a tank leak at this site.
5. (R01177) Lew Doty Cadillac, 5787 Scarlett Ct., (now Valley Nissan/Dodge) Dublin:  
Two underground fuel tanks removed in 1988, causing significant soil and shallow groundwater contamination. Soil excavated and aerated on-site, once in 1989 and additional soil excavated and aerated in 1990. All soil cleaned up to "ND" were replaced in tank pit. Groundwater treatment (pumping, treating and disposal into sanitary sewer) in place since early 1990. Extent of groundwater contamination reduced greatly; now appears to be confined to tank pit on-site, with hydrocarbon concentrations dropping steadily.
6. (R0721) Valley Nissan/ Dodge/ Volvo/ Mitsubishi/ Subaru: (6015 Scarlett Ct. Dublin)  
In 1988 a 280 gallon waste oil tank was removed when it overflowed. Soil contamination was limited to area immediately around the tank and the contaminated soil was removed. One groundwater monitoring well was installed and the last 3-4 quart monitoring showed "ND" levels of oil and grease.
7. (R0616) Scotsman Co., 6055 Scarlett Ct., Dublin:  
In 1987 two underground fuel tanks were removed. Minor contamination found in soil beneath and around tanks, but groundwater was affected. Seven monitoring wells and one groundwater extraction well have been installed. Groundwater remediation implemented in early 1990, using pump and treat method. The outer edge of plume in downgradient direction

Janie Layton  
Bechtel Environmental, Inc.  
February 25, 1991  
Page 3 of 4

(ssw flow) is 30-50 feet from the center of the plume, where the concentration of dissolved hydrocarbons are about 25ppm. About 200,000 gallons of water has been treated since remediation began.

8. Montgomery Ward, 7575 Dublin Blvd., Dublin:

(R0584)

One gasoline tank was punctured in late 1988 during a routine sticking. About 3000-8000 gallons of gasoline was released into backfill (pea gravel); some was recovered and pumped into a holding tank. In 1989 the remaining tanks were also removed. Pea gravel excavated completely and aerated on-site. Clean fill was placed back in the hole. Five monitoring wells and one extraction well ha been installed. No fuel product in monitoring well, however, a plume of contaminated groundwater appears to have migrated off-site. A groundwater pump-and-treat program was installed in fall of 1989 and was operational until the spring of 1991. A new consultant has been retained and a new groundwater remediation system should be in operation by this summer.

(#7240)

9. B.P. Oil Service Station (Dublin Auto Wash), 7420 Dublin Blvd., Dublin:

(R0304)

This used to be a Chevron Service Station. In February 1989 three underground fuel tanks were removed. Gravel (backfill) and several loads of contaminated water from the pit was hauled off to Class I disposal site. New tanks placed in the same hole; monitoring wells show intermittent, low levels of hydrocarbons. Groundwater monitoring is continuing. Additional contaminated soil found around the dispenser islands; Chevron removed all the soil it could without endangering the canopy structure. Contamination left in place will be treated via in-site aeration.

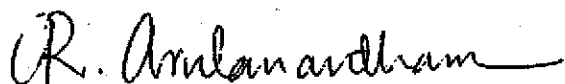
This letter is limited to information available to this department and does not reflect any other information which may be accessible from other local and governmental agencies or businesses involved with these sites.

Please find enclosed a copy of the invoice sent to our billing unit.

Janie Layton  
Bechtel Environmental, Inc.  
February 25, 1991  
Page 4 of 4

If you have any questions concerning this matter, please contact me  
at (415) 271-4320.

Sincerely,



A.R. Arulanantham  
Hazardous Materials Specialist

ARA:eco

Attachment(s) 1

cc: Files





Certified Mailer # P 062 128 205

Telephone Number: (415)

May 2, 1990

Mr. Reza Ziaei  
Dublin Auto Wash  
7240 Dublin Blvd.  
Dublin, CA 94568

**NOTICE OF VIOLATION**

Dear Mr. Ziaei:

As you're aware, three new underground storage tanks were installed at your facility in Dublin over the summer of 1989. You have submitted permit applications forms "A" and "B" to this office, as well as tank test results for all three tanks.

However, in order for your tanks to be properly permitted and operating legally, you are required to submit to this office both a written routine monitoring plan and a written spill/leak response plan. The former must include, where applicable, the frequency of performing the monitoring method, the methods and equipment to be used for monitoring, where monitoring will be performed, the name(s) and title(s) of the person(s) responsible for monitoring/maintaining equipment, and the reporting format. The spill/leak response plan should demonstrate that in the event of an unauthorized release, product would be removed from the secondary container within the shortest possible time. It should include at least the following:

- A. A description of the proposed methods and equipment to be used for removing the gasoline or diesel fuel, including the location and availability of the required equipment, if not permanently on-site, and an equipment maintenance schedule for the equipment located on-site.
- B. The name(s) and title(s) of the person(s) responsible for authorizing the work to be performed.

As-built documents for the tanks must also be submitted to become part of the permanent file. Your facility is in violation of Sec. 2632 of Title 23, Chap. 3, Subchap. 16 of the California Code of Regulations, because you have not submitted these materials but are nonetheless operating a filling station. On August 3, 1989, I explained to you these requirements, and that you would have to submit all of the appropriate paperwork prior to operating the filling station.

Mr. Reza Ziaei  
May 2, 1990  
Page 2 of 2

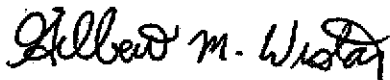
In addition, you have not submitted a business plan to this office, which I also left with you on August 3, to be completed and returned to this office within 30 days. Thus, you are in violation of the following sections of the California Health and Safety Code.

1. Sec. 25504(a) - The facility business plan requires annual inventory information on all liquid chemicals handled in quantities greater than or equal to 55 gallons (gasoline). This list has not been provided.
2. Sec. 25504(b) - The business plan also requires emergency response plans and procedures in the event of a reportable release or a threatened release of a hazardous material. At a minimum, this requirement consists of the following: agency notification procedures; procedures to mitigate a release or threatened release; and evacuation plans and procedures. (This material can be combined with the written routine monitoring and spill/leak contingency plans referred to above.)

Please submit all of the required materials to this office within 30 days, i.e., no later than June 1, 1990.

If you have any questions about this letter or about Title 23 requirements for new underground storage tanks, please contact the undersigned at 271-4320.

Sincerely,



Gil Wistar  
Hazardous Materials Specialist

cc: Tom Hathcox, Dougherty Regional Fire District  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Rafat A Shahid, Asst. Agency Director, Environmental Health  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Director



DEPT. OF ENVIRONMENTAL HLTH  
HAZARDOUS MATERIALS PROG.  
80 SWAN WAY, SUITE 200  
OAKLAND, CA 94621  
430-4530

R0304

⑤

Certified Mailer # P 062 127 793

Telephone Number: (415)

January 22, 1990

Mr. D. Moller  
Manager, Operations  
Chevron USA  
P.O. Box 5004  
San Ramon, CA 94583-0804

**NOTICE OF VIOLATION**

Dear Mr. Moller:

At five current or former Chevron sites in the cities of Oakland, Dublin, and Livermore, the Alameda County Department of Environmental Health, Hazardous Materials Division has determined that there are outstanding violations of the California Health and Safety Code (H&SC) requiring immediate attention. This letter describes these violations, which concern Sec. 25295(a)(1) and Sec. 25298(c)(4) of the H&SC. These violations are failure to report unauthorized releases of a hazardous material, and improper closure of an underground tank system, respectively. This letter does not address any other current or former Chevron sites within Alameda County, which also may have outstanding violations.

This office is the lead agency overseeing all five sites' environmental investigations and cleanups. The Regional Water Quality Control Board (RWQCB) is currently unable to manage the large number of fuel leak cases within Alameda County, and has therefore delegated this authority to our office, including provisions of the California Water Code. Nonetheless, you must continue to keep the Water Board apprised of all actions taken to characterize and remediate contamination, because the Board retains the ultimate responsibility for ensuring protection of waters of the state. The five sites included in this letter will be covered one at a time, beginning below.

(R0500) 1. 3701 Broadway, Oakland (former Chevron #9-1026)

At this site, five underground storage tanks were removed on April 21, 1988, and significant contamination was found both in soil and groundwater. In a letter dated 9/9/88, you stated that a remediation plan was being developed by Crowley Environmental Services of Oakland. Subsequently, this office has received two quarterly reports from Chevron, dated 8/14/89 and 12/15/89; both indicate that a remediation plan was being prepared. On August 14, 1989, I spoke with Lisa Marinaro of Chevron, USA, who stated that a remediation plan would be submitted to this office by September 1, 1989.

Mr. D. Moller  
January 22, 1990  
Page 2 of 4

Several inches of product have been found floating on the groundwater at this site, and dissolved TPH levels of as high as 672 ppm have been recorded in the 13 monitoring wells. In addition, levels of benzene up to 30 ppm have been found in the groundwater; thus it is clear that there is significant hydrocarbon contamination beneath the site. Still, no remediation plan has been received to date.

The gasoline discharges have created a continuing condition of groundwater pollution and nuisance that calls for the imposition of a cleanup schedule. Therefore, this site must be remediated according to the following schedule:

- A comprehensive remedial action plan is due in this office no later than February 23, 1990;
- Remediation acceptable to this office must go into operation by May 17, 1990;
- Water level measurements and sampling shall occur during the first quarter of 1990 and every month once remediation begins;
- Written progress reports shall be submitted every three months, with the first such report due on March 1, 1990. The September 1, 1990 report shall include an assessment of the effectiveness of the groundwater remediation system.

(# ~~74~~7240)

2. 7420 Dublin Blvd., Dublin (former Chevron #9-2582)

Underground gasoline tanks were removed from this site on February 16, 1989, and new installations for an independent operator were completed over the summer of 1989. On-site monitoring well EA-3 has yielded dissolved TPH levels of up to 2,300 ppm; the most recent groundwater monitoring results show levels of dissolved hydrocarbons at 110 ppm in the tank pit.

Some contaminated soil was left in place beneath the canopy support structure, because its removal could have caused canopy collapse. A soil venting system was installed prior to the installation and backfilling of new piping.

Bob Foss of Chevron USA has indicated on several occasions that a remediation system is in the works, but months have gone by without diligent actions to ensure that groundwater pollution does not move off site. Because of concern over potential contaminant migration to drinking water wells in the Amador Valley, a remedial plan for this site should be formalized and implemented according to a set timetable. Due dates are shown below.

Mr. D. Moller  
 January 22, 1990  
 Page 3 of 4

- A concise remedial action plan, including milestones and timetables, is due in this office by February 23, 1990. It should describe both soil venting/off-gas treatment (indicating the status of a BAAQMD permit, if required), and groundwater extraction/treatment.
- Soil venting/off-gas treatment shall begin operations by April 6, 1990.
- A limited groundwater extraction/treatment operation shall be on line by April 27, 1990.
- Water levels, sampling, and extracted soil gas sampling shall occur as frequently as necessary to monitor the systems' effectiveness, but no less often than quarterly. Quarterly progress reports must be submitted to this office and to the RWQCB, with the first report due June 1, 1990.

(R0221) 3. 5500 Telegraph Ave., Oakland (Chevron #0338)

R02887) At this site, old piping was removed on July 7, 1989; soil samples taken from one area of the pipe trench contained up to 800 ppm of hydrocarbons, and levels in soil just above the water table still exceeded 100 ppm. This data indicated the possibility of a significant release of gasoline to groundwater. As a result, in a September 13, 1989 letter to John Randall, Chevron USA, the Division requested a work plan to be submitted for this site within 30 days, and an unauthorized release report within 5 days. Chevron has not responded as of the date of this letter.

Chevron must still supply the information requested in the 9/13/89 letter; an unauthorized release report should be submitted to this office immediately. In addition, three monitoring wells around the trench "hot spot" shall be installed, developed, and sampled by March 9, 1990. We are requesting quarterly sampling and reporting for at least one year.

(R02) 4. 5509 Martin Luther King, Jr. Way, Oakland (Chevron #1583)

Old piping was removed from this site on December 14, 1989. One soil sample from the trench contained 1,700 ppm TPH and 180 ppm xylene. The sampler encountered the water table before soil hydrocarbons attenuated to below levels of concern. Therefore, the possibility exists for a significant release of gasoline to groundwater, and three monitoring wells must be installed around the point of release. These wells shall be installed, developed, and sampled by April 6, 1990, and then sampled quarterly for at least one year. In addition, an unauthorized release report must be submitted immediately to this office.

Mr. D. Moller  
January 22, 1990  
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5. 1925 Barcelona St., Livermore (former Chevron #9-7314)

Four underground tanks and associated piping were removed from this site on September 18, 1989. This office has still not received the soil sampling report, which was due 11/18/89. An EA, Engineering Science & Technology report dated 7/5/89 indicates that there was significant soil contamination around the tanks prior to their removal. Thus, an unauthorized release report is due in this office immediately, and soil sampling results and a comprehensive work plan to address soil and potential groundwater contamination must be submitted by February 23, 1990.

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Regarding these five sites, copies of all reports or work plans should also be sent to the RWQCB (attention: Lester Feldman). Because we are overseeing this site under the designated authority of the Water Board, this letter constitutes a formal request for technical reports, per Sec. 13267(b) of the California Water Code. Failure to respond in a timely manner could result in civil liabilities under the Water Code of up to \$1,000 per day. Other violations of California law, such as Sec. 25299 of the H&SC, which specifies fines of up to \$5,000 per day, may also be cited.

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

Sincerely,

*Gilbert M. Wistar*

Gil Wistar  
Hazardous Materials Specialist

cc: Doug Krause, DOHS  
Lester Feldman, San Francisco Bay RWQCB  
Gil Jensen, District Attorney, Alameda County Consumer and  
Environmental Protection Division  
Rafat Shahid, Asst. Agency Director, Environmental Health  
files (5 locations)

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO 304

June 14, 1989

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

Mr. Bob Foss  
Chevron U.S.A., Inc.  
P.O. Box 5004  
San Ramon, CA 94583-0804

Re: Request for deposit for remediation oversight, 7420 Dublin Blvd.,  
Dublin

Dear Mr. Foss:

As mentioned in this agency's letter to you outlining remediation requirements for the site shown above, Chevron will need to submit an additional deposit of \$600 to cover costs that the Division of Hazardous Materials incurs during remediation oversight. This deposit will be drawn upon only when the Hazardous Materials Specialist assigned to the project reviews work plans, quarterly reports, etc. No further review/oversight on this project can occur without these additional funds.

Please submit this deposit with a check made out to "Alameda County" as soon as possible. If you have any questions about this request, please contact Gil Wistar at 271-4320.

Sincerely,

*Rafat A. Shahid*

Rafat A. Shahid, Chief  
Hazardous Materials Division

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0304

Certified mailer #: P 833 981 385

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

April 7, 1989

Mr. Bob Foss  
Chevron U.S.A., Inc.  
P.O. Box 5004  
San Ramon, CA 94583-0804

Re: Unauthorized release from underground storage tanks and  
fuel island area, 7420 Dublin Blvd., Dublin  
9240

Dear Mr. Foss:

During the removal of three underground storage tanks on February 16, 1989, several soil samples and one water sample were taken from the excavation pit. The water sample was contaminated with hydrocarbons, and water samples from on-site monitoring wells have also showed contamination. Title 23 of the California Code of Regulations requires all such unauthorized releases from underground tanks to be reported. An unauthorized release report must be filed with this office within 5 days of the date of this letter; in addition, you must initiate further investigation and cleanup activities at this site, as outlined below.

As you're aware, Chevron has installed three monitoring wells at the site and has been sampling these wells on a quarterly basis; this program of sampling should continue, and water levels should also be taken during the sampling rounds. Additionally, because of the levels of hydrocarbons in groundwater under the site, the Hazardous Materials Division concurs with Chevron's stated intent to remediate groundwater, per Mr. Trimbach's letter of March 31, 1989. However, the extraction/reinjection scheme you have outlined will require a Waste Discharge Requirements permit from the San Francisco Bay Regional Water Quality Control Board (RWQCB); such a permit involves an extensive administrative process and stringent



Mr. Bob Foss  
April 7, 1989  
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monitoring protocol, both for chemical parameters of the treated water and for subsurface hydraulic control. In a relatively sensitive recharge area such as Dublin, we recommend that you instead consider groundwater treatment and disposal to the sanitary sewer. Assuming that treatment reduced hydrocarbons to acceptable levels in the water, this scheme would require a less onerous and less time-consuming waste discharge permit from the local POTW.

Based on analytical data received to date, we are not requiring further excavation or removal of soil from the tank pit area. However, you should characterize soil on the west end of the pump island area, in the vicinity of soil gas monitoring locations V7 and V8 (reference EA Engineering, Science, and Technology, Inc. reports dated 3/25/88 and 11/18/88). Soil borings should be installed in this area, and discrete soil samples analyzed for TPH-G and BTE&X, down to the water table.

If encountered, soils contaminated at hazardous waste concentrations should be transported by a licensed hazardous waste hauler and disposed of or treated at a facility approved by the California Department of Health Services. Soils found to be contaminated below the hazardous waste threshold may be managed as nonhazardous, but are still subject to the RWQCB's waste discharge requirements. This office will not issue a permit for new tank and piping installations until soil characterization and, if necessary, remediation is complete in the fuel island area.

Until groundwater/soil remediation is complete, you will need to submit reports to this office and to the RWQCB every three months, to coincide with quarterly groundwater monitoring and water level results. These reports should include information pertaining to further investigative results; the methods and costs of cleanup actions implemented to date; and the method and location of disposal of any contaminated material.

Your proposal for groundwater remediation and soil characterization/ remediation should be submitted to this office by May 1, 1989. A report describing the results of the fuel island soil borings should be submitted by June 1, 1989. Copies of the proposal and report should also be sent to the RWQCB (attention: Dyan Whyte).

You will need to submit an additional deposit of \$600 to cover costs that the Division of Hazardous Materials incurs during

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April 7, 1989  
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remediation oversight. If you have any questions about this letter or about remediation requirements established by the RWQCB, please contact Gil Wistar, Hazardous Materials Specialist, at 271-4320.

Sincerely,

*Rafat A. Shahid*

Rafat A. Shahid  
Chief, Hazardous Materials Division

RAS:GW:gw

cc: Howard Hatayama, DOHS  
Dyan Whyte, San Francisco Bay RWQCB  
Gil Jensen, District Attorney, Alameda County Consumer  
and Environmental Protection Agency  
files