

R0434

**Wickham, Jerry, Env. Health**

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**To:** Mike Purchase**Subject:** RE: R00000434; Tesoro-Livermore IRAP Status

Mike,

I agree with extending the schedule for an IRAP to March 21, 2008. We will be in a room with a large round table and have used one wall for projections.

Regards,

*Jerry Wickham*

Alameda County Environmental Health

1131 Harbor Bay Parkway

Alameda, CA 94502-6577

510-567-6791 phone

510-337-9335 fax

[jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org)

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**From:** Mike Purchase [<mailto:mpurchase@orionenv.com>]**Sent:** Monday, March 10, 2008 3:18 PM**To:** Wickham, Jerry, Env. Health**Subject:** R00000434; Tesoro-Livermore IRAP Status

Jerry,

I let my calendar slip and noticed that we have the IRAP for the Livermore site due tomorrow, 11 March 2007. We have the IRAP completed and were looking to present our proposal remedial design to you on Wednesday at our scheduled meeting. We would like to extend the deadline for the IRAP submittal to 21 March 2007 to allow for any changes based on your comments and thoughts in the meeting. Could you approve this extension request? I apologize for the late notice.

I'm planning to have an LCD projector at the meeting to connect to my laptop. Do you think there will be a wall or screen available to project onto for the meeting?

Thank you,  
Mike

Michael Purchase, P.E.  
Arctos Environmental  
1332 Peralta Avenue  
Berkeley, CA 94702  
510/525-2180  
510/525-2392 fax

3/11/2008

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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

December 28, 2007

Mr. Jeffrey Baker  
Tesoro Petroleum Companies, Inc.  
3450 S. 344<sup>th</sup> Way, Ste. 100  
Auburn, WA 98001-5931

Mr. Chuck Miller  
USA Petroleum Corporation  
30101 Agoura Ct., #200  
Agoura Hills, CA 91301

Mr. Joe Aldridge  
Valero Energy Corporation  
685 W. 3<sup>rd</sup> Street  
Hanford, CA 93230

Subject: Fuel Leak Case No. RO0000434 and Geotracker Global ID T0600101410, Beacon #3604, 1619 First Street, Livermore, CA

Dear Mr. Baker, Mr. Miller, and Mr. Aldridge:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted reports entitled, "First Quarter 2007 Status Report," dated June 15, 2007 and "Second Quarter 2007 Status Report," dated September 15, 2007. The "First Quarter 2007 Status Report," includes results of quarterly sampling of existing monitoring wells and presents results from off-site soil boring DB-7. Boring DB-7 is located approximately 550 feet downgradient of the site. Total petroleum hydrocarbons as gasoline (TPHg) and benzene were detected in grab groundwater samples collected from DB-7 at concentrations up to 1,600 and 150 micrograms per liter ( $\mu\text{g/L}$ ), respectively. The highest concentrations of TPHg and benzene were detected in the groundwater sample collected 67 feet bgs in boring DB-7. Please see technical comment regarding installation of monitoring wells to monitor water quality in the lower zones of the aquifer.

We concur with the recommendation in the Second Quarter 2007 Status Report to prepare a plan for remediation of impacted groundwater. We request that you submit a pilot test work plan or a corrective action plan **no later than March 11, 2008**. Please address the following technical comments, perform the proposed work, and send us the technical reports requested below.

**TECHNICAL COMMENTS**

1. **Remedial Action.** Soil vapor extraction (SVE) and air sparging was implemented at the site and in the downgradient area of the plume on the Livermore Arcade shopping center from May 1996 to February 1997. Operation of the SVE and air sparging system was discontinued in 1997 due to diminishing removal rates. Groundwater monitoring since 1997 indicates that a significant mass of fuel hydrocarbons and oxygenates remains in the subsurface. Based on the elevated concentrations of residual fuel hydrocarbons and oxygenates in soil and groundwater beneath and downgradient from the site, additional

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Mr. Joe Aldridge  
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remedial action is required. We request that you submit a pilot test work plan or a corrective action plan no later than March 11, 2008.

2. **Groundwater Monitoring for Lower Aquifer Intervals.** In downgradient borings DB-5 and DB-7, the highest concentrations of fuel hydrocarbons were detected in grab groundwater samples collected from lower intervals. However, no monitoring wells have been installed in the downgradient portion of the plume to monitor water quality in the lower intervals of the aquifer. In boring DB-5, TPHg and MTBE were detected at concentrations of 1,800 and 150 µg/L, respectively, in the grab groundwater sample collected 40 feet bgs. However, TPHg and MTBE were detected at concentrations of 58,000 and 1,500 µg/L, respectively, in the grab groundwater sample collected 53 feet bgs. Adjacent monitoring well MW-6 is screened from approximately 28 to 48 feet bgs. In boring DB-7, TPHg was detected at a concentration of 160 µg/L in the groundwater sample collected 54 feet bgs but was detected at a concentration of 6,800 µg/L in the groundwater sample collected 67 feet bgs. The nearest monitoring well to DB-7 is well MW-9, which extends only to a depth of approximately 46 feet bgs. We request that you include plans for monitoring well installation within the downgradient portion of the plume in the pilot test work plan or corrective action plan requested below.
3. **Quarterly Groundwater Monitoring.** Quarterly groundwater monitoring is to be continued for the site. Please present the results in the Quarterly Status Reports requested below.

#### TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **March 11, 2008** – Pilot Test Work Plan or Corrective Action Plan
- **75 days following the end of each quarter** – Quarterly Status Reports

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to 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 Instructions." 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. In September 2004, the SWRCB

Mr. Jeffrey Baker  
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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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

#### PERJURY STATEMENT

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

#### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

#### UNDERGROUND STORAGE TANK CLEANUP FUND

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

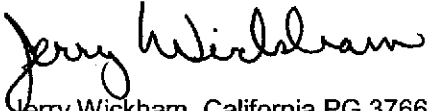
#### AGENCY OVERSIGHT

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

Mr. Jeffrey Baker  
Mr. Chuck Miller  
Mr. Joe Aldridge  
December 28, 2007  
Page 4

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org).

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Cheryl Dizon, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway  
Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street  
Pleasanton, CA 94566

Michael Purchase, Arctos Environmental, 1332 Peralta Avenue, Berkeley, CA 94702

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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(510) 567-6700  
FAX (510) 337-9335

October 9, 2006

Mr. Jeffrey Baker  
Tesoro Petroleum Companies, Inc.  
3450 S. 344<sup>th</sup> Way, Ste. 100  
Auburn, WA 98001-5931

Mr. Chuck Miller  
USA Petroleum Corporation  
30101 Agoura Ct., #200  
Agoura Hills, CA 91301

Mr. Joe Aldridge  
Valero Energy Corporation  
685 W. 3<sup>rd</sup> Street  
Hanford, CA 93230

Subject: Fuel Leak Case No. [REDACTED] Beacon #3604, 1619 First Street, Livermore, CA –  
Work Plan Approval

Dear Mr. Baker, Mr. Miller, and Mr. Aldridge:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Second Quarter 2006 Status Report," dated September 30, 2006. The "Second Quarter 2006 Status Report," includes results of quarterly sampling of existing monitoring wells and presents plans to install one soil boring downgradient of boring DB-6 using a cone penetrometer rig. The proposed scope of work is acceptable provided that the technical comments below are addressed during the field investigation.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

**TECHNICAL COMMENTS**

1. **Proposed Sampling Location and Depth of Boring.** The proposed location of boring DB-7, shown on Figure 5, is acceptable. Grab groundwater samples are to be collected from each permeable water-bearing layer identified using the CPT data. In order to identify the regional aquitard, the boring is to be extended to a depth of approximately 90 feet bgs.
2. **Laboratory Analyses.** The proposed analyses for groundwater samples are acceptable. Please present the results in the Fourth Quarter 2006 Status report requested below.
3. **Remedial Action and Microbiological Testing.** Due to the elevated concentrations of fuel hydrocarbons detected in groundwater on and off site, remedial action will be required for the site. Microbiological sampling and testing was initiated during the Second Quarter 2006 to help evaluate potential remedial technologies. Please present the results from the microbiological testing in the Third Quarter 2006 report requested below.

Mr. Jeffrey Baker  
Mr. Chuck Miller  
Mr. Joe Aldridge  
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### TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **December 15, 2006** – Third Quarter 2006 Status Report with Results of Microbiological Testing
- **March 15, 2007** – Fourth Quarter 2006 Status Report with Results from Proposed Downgradient Boring DB-7
- **75 days following the end of each quarter** – Quarterly Status Reports

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to 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 Instructions." 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. 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

### PERJURY STATEMENT

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

Mr. Jeffrey Baker  
Mr. Chuck Miller  
Mr. Joe Aldridge  
October 9, 2006  
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### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

### UNDERGROUND STORAGE TANK CLEANUP FUND


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

### AGENCY OVERSIGHT

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

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway  
Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street  
Pleasanton, CA 94566



Mr. Jeffrey Baker  
Mr. Chuck Miller  
Mr. Joe Aldridge  
October 9, 2006  
Page 4

Michael Purchase, Arctos Environmental, 1332 Peralta Avenue, Berkeley, CA 94702

Sunil Ramdass, SWRCB Cleanup Fund, 1001 I Street, 17<sup>th</sup> floor, Sacramento, CA 95814-2828

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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(510) 567-6700  
FAX (510) 337-9335

June 23, 2006

Mr. Jeffrey Baker  
Tesoro Petroleum Companies, Inc.  
3450 S. 344<sup>th</sup> Way, Ste. 100  
Auburn, WA 98001-5931

Mr. Chuck Miller  
USA Petroleum Corporation  
30101 Agoura Ct., #200  
Agoura Hills, CA 91301

Mr. Joe Aldridge  
Valero Energy Corporation  
685 W. 3<sup>rd</sup> Street  
Hanford, CA 93230

Subject: Fuel Leak Case No. RO000 [REDACTED] Beacon #3604, 1619 First Street, Livermore, CA

Dear Mr. Baker, Mr. Miller, and Mr. Aldridge:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "First Quarter 2006 Status Report," dated June 12, 2006. The "First Quarter 2006 Status Report," includes results of a field investigation (soil gas sampling, soil sampling, and grab groundwater sampling) and quarterly groundwater monitoring of existing wells. The purpose of the field investigation was to identify the depth of the regional aquitard at and downgradient of the site, determine the vertical extent of soil and groundwater contamination, and identify possible sources in the vadose zone. The results of the field investigation were reviewed and discussed during a meeting on June 14, 2006 between Jeff Baker of Tesoro, Mike Purchase and Jeffrey Gwinn of ARCTOS, and Jerry Wickham and Donna Drogos of ACEH.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

**TECHNICAL COMMENTS**

1. **Source Areas for MTBE in Vadose Zone.** Based on the results of soil gas sampling and previous analytical data for soil, the "First Quarter 2006 Status Report," concluded that no existing source areas for MTBE are present in the vadose zone that would lead to further increasing concentrations of MTBE in the groundwater. We concur that no additional soil gas sampling or additional investigation of the vadose zone is required at this time.
2. **Lateral Extent of Dissolved Phase Contamination.** Total petroleum hydrocarbons as gasoline (TPHg) were detected at concentrations of 2,000 and 1,100 micrograms per liter ( $\mu\text{g/L}$ ) in grab groundwater samples collected at depths of 40 and 53 feet bgs, respectively, at sampling location DB-6. Sampling location DB-6 is approximately 400 feet northwest of the site and is the furthest downgradient sampling location. Although TPHg was detected at elevated concentrations in the grab groundwater samples collected at location DB-6, MTBE

Mr. Jeffrey Baker  
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was not detected and benzene was detected at concentrations ranging from 0.5 to 13 µg/L. Due to the location of water supply well SCW-08 downgradient of the plume, we request that additional groundwater sampling be conducted downgradient of location DB-6 to assess whether a detached MTBE plume is present beyond DB-6. Please present plans to assess groundwater quality downgradient of DB-6 in the Work Plan requested below.

- 3. Remedial Action and Use of Bio Trap Samplers.** Due to the elevated concentrations of fuel hydrocarbons detected in groundwater on and off site, remedial action will be required for the site. During the June 14, 2006 meeting, the use of bio trap samplers was discussed to evaluate rates of degradation and response to amendments, and compare microbial communities prior to remedial action. We concur with the collection of these data to help evaluate potential remedial technologies. Please provide a description of the planned bio trap sampling methods and a schedule for data collection and reporting in the Second Quarter 2006 Status Report requested below.

#### **TECHNICAL REPORT REQUEST**

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **August 25, 2006** – Work Plan
- **September 15, 2006** – Second Quarter 2006 Status Report
- **December 15, 2006** – Third Quarter 2006 Status Report
- **March 15, 2007** – Fourth Quarter 2006 Status 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**

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Mr. Jeffrey Baker  
Mr. Chuck Miller  
Mr. Joe Aldridge  
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Page 3

monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

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#### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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#### UNDERGROUND STORAGE TANK CLEANUP FUND

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

#### AGENCY OVERSIGHT

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Mr. Jeffrey Baker  
Mr. Chuck Miller  
Mr. Joe Aldridge  
June 23, 2006  
Page 4

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Matt Katen, QIC 80201  
Zone 7 Water Agency  
100 North Canyons Parkway  
Livermore, CA 94551

Danielle Stefani  
Livermore-Pleasanton Fire Department  
3560 Nevada Street  
Pleasanton, CA 94566

Michael Purchase  
Arctos Environmental  
1332 Peralta Avenue  
Berkeley, CA 94702

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

R0434

**Wickham, Jerry, Env. Health**

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**From:** Wickham, Jerry, Env. Health  
**Sent:** Thursday, June 22, 2006 3:35 PM  
**To:** 'mpurchase@arctosenv.com'  
**Subject:** RE: Question RE: GW Sampling  
**Attachments:** No Purge Example Letter.doc

Hi Mike,

No purge sampling is allowed on a case by case basis in Alameda County but we have no written guidelines. If we did have guidelines, they would look most like the attached Santa Clara Valley Water District guidance for changing to no purge sampling. We do not have different sampling requirements for closure.

Regards,

*Jerry Wickham*

Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Suite 250  
Alameda, CA 94502-6577  
510-567-6791 phone  
510-337-9335 Fax  
[jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org)

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**From:** Mike Purchase [<mailto:mpurchase@orionenv.com>]  
**Sent:** Thursday, June 22, 2006 8:25 AM  
**To:** Wickham, Jerry, Env. Health  
**Subject:** Question RE: GW Sampling

Hi Jerry,

I was wondering how Alameda County Environmental Health thought of no-purge sampling at petroleum release sites? Jeff Baker, at Tesoro, had a question about standard purge-and-bail versus low-flow sampling and no-purge sampling for all of his sites so I am trying to get regulator feed back on no-purge sampling.

In the past we have conduct pre and post purge samples to determine if no-purge sampling was appropriate before changing procedures. Although, some regulatory agencies still require the standard purge-and-bail procedure for 8 final round of closure monitoring.

Does ACEH (1) allow no-purge sampling, (2) have guidelines for changing to no-purge that should be followed, and (3) have different sampling requirements for closure?

I appreciate any assistance you can give me with this inquiry.  
Thank you,

Mike Purchase  
Arctos Environmental  
1332 Peralta Avenue  
Berkeley, CA 94702  
510/525-2180  
510/525-2392 fax

6/22/2006

## Wickham, Jerry, Env. Health

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**To:** mpurchase@arctosenv.com

**Subject:** RE: RO#0000434 Inv report request for extension

Mike,

Based on your request, the schedule for submittal of the site investigation report for case RO0434 (1619 First Street, Livermore) is extended to June 12, 2006. The header on the letter may have caused this one to get misplaced.

Regards,

*Jerry Wickham*

Hazardous Materials Specialist

Alameda County Environmental Health

1131 Harbor Bay Parkway

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Alameda, CA 94502-6577

510-567-6791 phone

510-337-9335 Fax

[jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org)

---

**From:** Mike Purchase [mailto:[mpurchase@orionenv.com](mailto:mpurchase@orionenv.com)]

**Sent:** Tuesday, June 06, 2006 11:50 AM

**To:** Wickham, Jerry, Env. Health

**Subject:** RO#0000434 Inv report request for extension

Hi Jerry,

Attached is the letter we sent over requesting an extension of the report submittal deadline from 28 April to 12 June 2006.

Let me know if you have any questions or comments.

Thank you,

Mike Purchase

Arctos Environmental

1332 Peralta Avenue

Berkeley, CA 94702

510/525-2180

510/525-2392 fax

6/6/2006

R0434

ARCTOS

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*Main Office*  
3450 E. Spring St., Suite 212 562 988-2755 PHONE  
Long Beach, CA 90806 562 988-2750 FAX

24 April 2006  
Project No. 01LV

Jerry Wickham  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway, Suite 250  
Alameda, California 94502-6577

**Subject: Request for Extension to Groundwater Site Investigation Report**  
~~2098 Mount Diablo Boulevard, Walnut Creek, California~~  
~~Tesoro Station No. 671116; RWQCB Case No. 07-0337~~

1619 First Street, Livermore R0434

Dear Mr. Leyva:

Arctos Environmental (Arctos), on behalf of Tesoro Companies, Inc. (Tesoro), is requesting an extension of the submittal date for a site investigation report and revised site conceptual model for the subject site. A request for a report by 28 April 2006 was in your letter dated 2 December 2005 with approval of the Site Investigation Work Plan. Arctos is requesting an extension of 45 days for the submittal of the site investigation report and revised site conceptual model no later than 12 June 2006.

If you have any questions or comments regarding this request, please call Mike Purchase at 510/525-2180 or Jeff Gwinn at 562/988-2755.

Very truly yours,

**ARCTOS ENVIRONMENTAL**



Michael P. Purchase  
Senior Project Manager



Jeffrey P. Gwinn, P.E.  
Vice President

Copy: Jeffrey M. Baker – Tesoro Companies, Inc.  
Chuck Miller – USA Petroleum Corporation  
Bettie Graham – Regional Water Quality Control Board, San Francisco Bay Region



ALAMEDA COUNTY  
**HEALTH CARE SERVICES**

AGENCY  
DAVID J. KEARS, Agency Director



7

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

December 2, 2005

Mr. Jeffrey Baker  
Tesoro Petroleum Companies, Inc.  
3450 S. 344<sup>th</sup> Way, Ste. 100  
Auburn, WA 98001-5931

Mr. Chuck Miller  
USA Petroleum Corporation  
30101 Agoura Ct., #200  
Agoura Hills, CA 91301

Mr. Joe Aldridge  
Valero Energy Corporation  
685 W. 3<sup>rd</sup> Street  
Hanford, CA 93230

Subject: Fuel Leak Case N [REDACTED] Beacon #3604, 1619 First Street, Livermore, CA -  
Work Plan Approval

Dear Mr. Baker, Mr. Miller, and Mr. Aldridge:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Third Quarter 2005 Status Report," dated October 15, 2005 and received by ACEH on October 26, 2005. ACEH also reviewed the Site Conceptual Model, which is available at the project internet web site. The "Third Quarter 2005 Status Report," includes results of quarterly groundwater monitoring, a proposed scope of work for additional investigation, and field and QA/QC procedures. The purpose of the proposed scope of work is to identify the depth of the regional aquitard at and downgradient of the site, determine the vertical extent of soil and groundwater contamination, and identify possible sources in the vadose zone.

ACEH concurs with the proposed scope of work provided that the technical comments below are addressed. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below. Please provide 72-hour advance written notification to this office (e-mail preferred to [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org)) prior to the start of field activities.

**TECHNICAL COMMENTS**

1. **Site Conceptual Model.** The Site Conceptual Model (SCM) on the project internet web site was well organized, well written, and easy to use. Following completion of the proposed additional investigation, please revise the SCM to include the investigation results.
2. **Soil Gas Sampling.** Soil gas sampling is to be conducted following guidelines contained in the January 28, 2003 DTSC/RWQCB-LARWQCB *Advisory – Active Soil Gas Investigations*. Please present the results in the Additional Investigation Report requested below.

3. **Vertical Intervals for Grab Groundwater Sampling.** Collection of grab groundwater samples at approximate intervals of 30 to 34 feet below grade, 46 to 50 feet below grade, and 60 to 64 feet below grade is proposed in the above referenced scope of work. Based on the expected soil conditions at the site and estimated depth of the regional aquitard, ACEH generally concurs with the approximate depths of the proposed sampling. However, the actual depths of grab groundwater samples are to be adjusted in the field based on encountered conditions in order to collect samples from coarse-grained layers that are potential migration pathways. As an example, the currently proposed grab groundwater sampling interval at 46 to 50 feet in proposed boring DB-2 (Geologic Cross-Section A-A') may be within a fine-grained layer that was previously encountered at depths of approximately 44 to more than 55 feet below grade in the boring for MW-2. The groundwater sampling interval for boring DB-2 should be adjusted in order to obtain a grab groundwater sample above the fine-grained soils expected to be encountered.
4. **Soil Samples.** ACEH concurs with the proposal in the scope of work to collect soil samples continuously for logging purposes and to collect soil samples at 10-foot intervals for laboratory analysis but requests that the soil samples also be screened in the field to select samples for chemical analyses. Soil samples are to be submitted for analyses for all depth intervals where staining, odor, or elevated PID readings are observed. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval.
5. **Laboratory Analyses.** ACEH concurs with the proposed analyses for soil and groundwater samples but requests that the fuel oxygenates include DIPE, ETBE, TAME, TBA, and ethanol in addition to MTBE. Please present the results in the Additional Investigation Report requested below.

#### **TECHNICAL REPORT REQUEST**

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **April 28, 2006** – Additional Investigation Report with Revised Site Conceptual Model

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**

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the

Mr. Jeffrey Baker  
Mr. Chuck Miller  
Mr. Joe Aldridge  
December 2, 2005  
Page 3

Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." 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. 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

#### PERJURY STATEMENT

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

#### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

#### UNDERGROUND STORAGE TANK CLEANUP FUND

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

Mr. Jeffrey Baker  
Mr. Chuck Miller  
Mr. Joe Aldridge  
December 2, 2005  
Page 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) 567-6791.

Sincerely,



Jerry Wickham  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey, QIC 80201  
Zone 7 Water Agency  
100 North Canyons Parkway  
Livermore, CA 94551

Danielle Stefani  
Livermore-Pleasanton Fire Department  
3560 Nevada Street  
Pleasanton, CA 94566

Michael Purchase  
Arctos Environmental  
1332 Peralta Avenue  
Berkeley, CA 94702

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

7

April 28, 2005

Jeff Baker  
Tesoro Petroleum Companies, Inc.  
3450 S. 344th Way, Ste. 100  
Auburn, WA 98001-5931

Chuck Miller  
USA Petroleum Corporation  
30101 Agoura Ct., #200  
Agoura Hills, CA 91301

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

Joe Aldridge  
Valero  
685 W. 3rd St.  
Hanford, CA 93230

Subject: Fuel Leak Case N[REDACTED], Beacon #3604, 1619 1st Street, Livermore, California – MPE Pilot Test Workplan Approval

Dear Mssrs. Baker, Aldridge and Miller:

Alameda County Environmental Health (ACEH) has reviewed your July 21, 2004, *Multiphase Pilot Testing Work Plan* prepared by Delta Environmental Consultants, Inc., for the above-referenced site. Delta proposes two phase extraction (TPE) from onsite well VW-2, with a contingency to perform dual-phase extraction (DPE) should the well yield exceed 2 gpm. Via teleconference on April 28, 2005, Delta stated that the most recent groundwater concentrations in well VW-2 were 3,800 ug/L TPHg, 210 ug/L benzene, and 2,900 ug/L MTBE on January 12, 2005. We concur with your workplan provided the following conditions are met:

1. The pilot test will be a continuous 40-hr test. Any down time resulting from equipment malfunction will be documented and start-up procedures re-initiated following repair.
2. At a minimum, two sets of samples, each set including one groundwater and one vapor sample, will be collected and analyzed for TPHg, BTEX, and MTBE. The first set of samples will be collected following startup, within the first hour of operation. The second set of samples will be collected immediately prior to completion of the pilot test.
3. If DPE is performed, an aquifer test needs to be performed as part of the pilot test. The aquifer test procedures, field measurements, evaluation and reporting need to be in general accordance with *Aquifer Testing for Hydrogeologic Characterization, Guidance Manual for Groundwater Investigations*, CalEPA, July 1995.
4. If DPE is performed, extraction well and system influent groundwater needs to be analyzed for TPHg, BTEX, MTBE and TBA.
5. Delta proposes measurement of: 1) depth to water in the extraction well and three monitoring points, 2) wellhead vacuum in VW-2, TP-1, and TP-2 and system vacuum, 3) stinger/drop tube vacuum, 4) influent and effluent vapor concentrations, 5) vapor influent rate from the extraction well, 6) groundwater extraction rate from the extraction well, 7) influent and effluent vapor stream temperatures. In addition to the measurements proposed by Delta, field measurements during the test need to include A) total volume of liquids extracted, and B) if vacuum influence is detected in TP-2 then vacuum needs to be measured in well MW-1.

6. The final report will include an assessment of contaminant mass removed by the test (aqueous and vapor phase) and an evaluation of the mass likely remaining in the source area. Recommendations in the final report will include a workplan for appropriate future action(s).
7. 72-hr advance written notification (email preferred) will be provided to ACEH prior to field sampling activities.

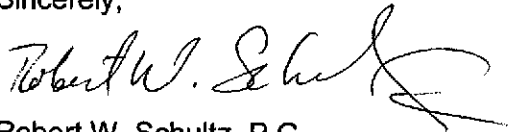
Please implement the proposed pilot test and submit technical reports following the schedule below.

#### REPORT REQUEST

Please submit your *MPE Pilot Test Report and Workplan* by **July 28, 2005**. ACEH makes this request pursuant to California Health & Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2778 outline the responsibilities of a responsible party for an unauthorized release from an UST system, and require your compliance with this request.

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

Sincerely,



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

cc: James Brownell, Delta Environmental Consultants, 3164 Gold Camp Dr., Ste. 200,  
Rancho Cordova, CA 95670  
Matt Katen, Zone 7 Water District, QIC 80201  
Donna Drogos, ACEH  
File

PO-424

**Schultz, Robert, Env. Health**

---

**From:** Scott Graham [SGraham@deltaenv.com]  
**Sent:** Thursday, February 10, 2005 8:44 AM  
**To:** Schultz, Robert, Env. Health  
**Subject:** RE: 1619 1st., Livermore

No schedule as of yet. We were waiting for a response to the Work Plan before proceeding with anything.

Thanks for the quick reply.

Scott Graham  
Project Manager  
Delta Environmental  
(916) 503-1273

-----Original Message-----

**From:** Schultz, Robert, Env. Health [mailto:robert.schultz@acgov.org]  
**Sent:** Thursday, February 10, 2005 8:31 AM  
**To:** Scott Graham  
**Subject:** 1619 1st., Livermore

Scott:

I transcribed your phone number incorrectly so I asked Lee for your info. Yes, I am the caseworker for your site. Was the MPE Test WP submitted as part of your QMR? We get quite a few QMRs so a workplan that was not clearly marked could have been overlooked. In any case, I will review the WP as soon as possible. Do you have a schedule that you are working on? It will likely take me 30 days to issue a written response. If that is not acceptable, please call and we can work something else out.

Sincerely,  
Bob

-----Original Message-----

**From:** Scott Graham [mailto:SGraham@deltaenv.com]  
**Sent:** Thursday, February 10, 2005 8:22 AM  
**To:** Schultz, Robert, Env. Health  
**Subject:** FW: Shell site at 3790 Hopyard, Pleasanton

Mr. Schultz,

You had me confused for a while with the reference to a Shell site. My question is in regards to Tesoro #67076 (former Beacon Station # 3604) which is located at 1619 First Street in Livermore, CA. On July 21, 2004 Delta submitted a Multiphase Pilot Testing Work Plan (and Quarterly Groundwater Monitoring Report - First Quarter 2004) and there has been no response from the County as to whether or not the Work Plan has been approved. Have you seen the Work Plan? Any thoughts or modifications needed? We would like to proceed with the testing asap to prevent any further migration of dissolved hydrocarbons offsite.

Also, I wanted to confirm that you are the correct regulator for this site (I also have Amir Gholami and Eva Chu listed as the possible regulators).

Thank you,

2/10/2005

Scott Graham  
Project Manager  
Delta Environmental  
(916) 503-1273

-----Original Message-----

**From:** Lee Dooley  
**Sent:** Wednesday, February 09, 2005 2:31 PM  
**To:** 'Schultz, Robert, Env. Health'  
**Cc:** Scott Graham  
**Subject:** RE: Shell site at 3790 Hopyard, Pleasanton

Scott Graham is in our Rancho Cordova office. I am forwarding this message to him.

R. Lee Dooley  
DELTA ENVIRONMENTAL CONSULTANTS, INC.  
175 Bernal Road, Suite 200  
San Jose, CA 95119  
Phone: 408.224.4724  
Cell: 408.656.2505

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-----Original Message-----

**From:** Schultz, Robert, Env. Health [mailto:robert.schultz@acgov.org]  
**Sent:** Wednesday, February 09, 2005 2:15 PM  
**To:** Lee Dooley  
**Subject:** RE: Shell site at 3790 Hopyard, Pleasanton

Thank you for the notification.

Lee,  
I recv'd a voicemail from Scott Graham of your offices this morning, but I seemed to have the wrong phone number for him. Can you either give me his number or fwd this email to him. Thanks!  
Bob

-----Original Message-----

**From:** Lee Dooley [mailto:lidooley@deltaenv.com]  
**Sent:** Wednesday, February 09, 2005 2:08 PM  
**To:** Schultz, Robert, Env. Health  
**Cc:** Petryna, Karen E SOPUS  
**Subject:** Shell site at 3790 Hopyard, Pleasanton

Bob,  
Just a reminder that Delta will be performing the CPT investigation (nine locations) on Tuesday through Friday of next week at the site referenced above. The scope of work is as presented in the work plan by Cambria dated June 30, 2004 and the letter to you from Karen Petryna dated December 8, 2004. We will be doing air-knifing Monday and Tuesday. I will be on site all day Tuesday and Wednesday to supervise the initial borings.

R. Lee Dooley  
DELTA ENVIRONMENTAL CONSULTANTS, INC.  
175 Bernal Road, Suite 200  
San Jose, CA 95119



Phone: 408.224.4724

Cell: 408.656.2505

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2/10/2005

720-434



**TESORO**

Tesoro Petroleum Companies, Inc.  
Corporate Environmental Affairs  
3450 South 344th Way, Suite 100  
Auburn, WA 98001-5931  
253 896 8700  
253 896 8887 Fax

Alameda County  
JUN 24 2004  
ENVIRONMENTAL SERVICES

June 17, 2004

Ms. Eva Chu  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway, room 250  
Alameda, California 94502

Ms. Betty Graham  
Regional Water Quality Control Board  
San Francisco Bay Region  
1515 Clay Street, Suite 1400  
Oakland, California 94612

**RE: Change of Ownership to Tesoro Environmental Resources Company  
Investigation/Remediation Project at 1619 West First Street, Livermore, California  
Former Tesoro Station No. 67076**

Dear Ms. Chu and Ms. Graham:

In a realignment of assets owned by Tesoro, the ownership of the above referenced project has been transferred to Tesoro Environmental Resources Company. All contact information regarding this project will remain the same. Representatives from Tesoro Petroleum Companies, Inc. will continue to manage all aspects of site investigation, remediation and closure on behalf of Tesoro Environmental Resources Company. This letter is solely a notification of change of ownership.

Please contact me at (253) 896-8700 if you have any questions regarding this ownership change.

Sincerely,

Jeffrey M. Baker, P.E.  
Supervisor, Environmental  
Compliance & Remediation  
Tesoro Petroleum Companies, Inc.

CC: Delta Environmental – Jim Brownell  
Brian Kelleher – Kelleher & Associates  
Gallagher & Miersch, Inc. – Thomas M. Foley  
Green Valley Gasoline LLC – Chuck Miller  
Tesoro Legal – San Antonio, TX  
Kings Beach Project Files – Auburn, WA

## Chu, Eva, Env. Health

---

**From:** Tracy Walker [twalker@trcsolutions.com]  
**Sent:** Friday, May 31, 2002 4:20 PM  
**To:** 'Chu, Eva, Env. Health'  
**Cc:** Rob Donovan (E-mail)  
**Subject:** RE: Beacon Station 3604 at 1619 W First Street, Livermore

Eva,

With regard to installing the offsite wells, we have to obtain an access agreement with the property owner before we can install the wells. I was in the process of identifying the property owner when it became clear that Tesoro would be acquiring this site as part of their agreement with Ultramar. The process of obtaining the access agreement was temporarily put on hold until the deal became final so that we did not have to go through the process a second time after Tesoro took control of the site. Now that the Tesoro acquisition is final, we will move forward with trying to obtain an access agreement with the property owner.

I will update you once we have contacted the property owner and can establish a schedule for completing the access agreement.

Tracy Walker  
TRC  
925.688-2476

-----Original Message-----

**From:** Chu, Eva, Env. Health [mailto:EChu@co.alameda.ca.us]  
**Sent:** Friday, May 24, 2002 2:39 PM  
**To:** Walker Tracy (E-mail); Ron Donovan (E-mail)  
**Subject:** Beacon Station 3604 at 1619 W First Street, Livermore

Hi Ron and Tracy,

I completed review of TRC's first quarter 2002 Quarterly Progress Report. I does not appear that groundwater has been analyzed for ether oxygenates, ethanol and lead scavengers (EDB, 1,2-DCA). Please have this done next sampling event.

Also, I approved a workplan for the installation of three offsite groundwater monitoring wells in June 2001. To date, I have not received word that field work has been completed. Please update well installation status.

eva chu  
Hazardous Materials Specialist  
1131 Harbor Bay Parkway  
(510) 567-6762  
(510) 337-9335 (fax)

20-434

**Chu, Eva, Env. Health**

---

**From:** Chu, Eva, Env. Health  
**Sent:** Friday, May 24, 2002 2:39 PM  
**To:** Walker Tracy (E-mail); Ron Donovan (E-mail)  
**Subject:** Beacon Station 3604 at 1619 W First Street, Livermore

Hi Ron and Tracy,

I completed review of TRC's first quarter 2002 Quarterly Progress Report. I does not appear that groundwater has been analyzed for ether oxygenates, ethanol and lead scavengers (EDB, 1,2-DCA). Please have this done next sampling event.

Also, I approved a workplan for the installation of three offsite groundwater monitoring wells in June 2001. To date, I have not received word that field work has been completed. Please update well installation status.

*eva chu*  
Hazardous Materials Specialist  
1131 Harbor Bay Parkway  
(510) 567-6762  
(510) 337-9335 (fax)

# Ultramar

Ultramar, Inc.  
685 W. Third Street  
Hanford, CA 93230-5016  
(559) 582-0241

Fax: 559-583-3282 Environmental  
559-583-3256 Retail Administration  
559-583-3330 Human Resource  
559-583-3382 Maintenance

May 17, 2002

Ms. Eva Chu  
Alameda County Env Health  
1131 Harbor Bay Pkwy #250  
Alameda CA 94502

MAY 21 2002

## CHANGE IN ENVIRONMENTAL RESPONSIBILITY

**FORMER BEACON STATION NO. 3604  
1619 W. FIRST ST., LIVERMORE, CA 94550**

As of May 17, 2002, environmental responsibility for the above-referenced property has changed. Based on contractual language associated with the sale of the property, Ultramar Inc. is no longer the Responsible Party (RP) for corrective action at the site.

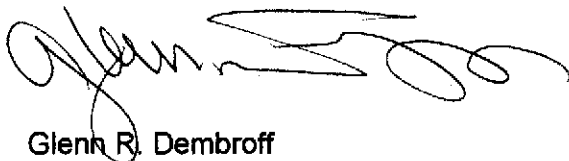
The new Responsible Party for this site is:

**Tesoro West Coast Company**  
3450 S. 344th Way, Suite 100  
Auburn, WA 98001-5931  
ATT: Rod Donovan

Phone: 253-896-8716  
Email: [rdonovan@tesoropetroleum.com](mailto:rdonovan@tesoropetroleum.com)

Please make the appropriate change(s) to your database and send all future correspondence to Tesoro West Coast Company.

Sincerely,  
**ULTRAMAR INC.**



Glenn R. Dembroff  
Manager  
Retail Environmental Services



LO - 434



**TESORO**

MAY 21 2002

May 17, 2002

Ms. Eva Chu  
Alameda County Environmental Health  
1131 Harbor Bay Pkwy, #250  
Alameda, CA 94502

Tesoro Petroleum Companies, Inc.  
3450 South 344th Way, Suite 100  
Auburn, Wa. 98001-5931  
253 896 8700  
253 896 8887 Fax

**RE: Change of Ownership, Service Station at 1619 W First Street, Livermore, CA**

Dear Madam:

The purpose of this letter is to notify you that on the day of this correspondence, May 17, 2002, ownership of the Beacon service stations at the addresses listed above has been transferred from Ultramar Inc. (a subsidiary of Valero Energy Corporation) to Tesoro Refining and Marketing Company (Tesoro). This transfer has occurred upon approval by the U.S. Federal Trade Commission and the States of California and Oregon of Ultramar's sale to Tesoro of the Golden Eagle Refinery and seventy service stations in northern California.

Please contact Catherine Runden of Tesoro at (253) 896-8735 if you have any questions.

Thank you,

Rob Donovan  
VP, Corporate Environmental Affairs  
Tesoro Petroleum Companies, Inc.

Cc: Mr. Cecil Fox  
California Regional Water Quality Control Board  
San Francisco Bay Region  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

no-434

MAY 01 2002



**TESORO**

Tesoro Petroleum Companies, Inc.  
3450 South 344th Way, Suite 100  
Auburn, Wa. 98001-5931  
253 896 8700  
253 896 8887 Fax

April 22, 2002

Certified Mail, Return Receipt Requested

Ms. Eva Chu  
Alameda County Environmental Health  
1131 Harbor Bay Pkwy, #250  
Alameda, CA 94502

**RE: Change of Ownership, Service Station at 1619 W First Street, Livermore, CA**

Dear Ms. Chu:

The ownership of the Beacon service station at 1619 W First Street in Livermore will be transferred from Ultramar Inc. (a subsidiary of Valero Energy Corporation) to Tesoro Refining and Marketing Company ("Tesoro") on or about April 30, 2002. This transfer will occur upon approval by the U.S. Federal Trade Commission and the States of California and Oregon of Ultramar's sale to Tesoro of the Golden Eagle Refinery and seventy service stations in northern California.

Tesoro will assume environmental responsibilities at the site from Ultramar upon change of ownership. During this transition period, Tesoro is retaining all environmental contractors and consultants currently working on this project. Thus we expect this to be a seamless transition.

Please do not hesitate to contact me if you have questions regarding today's correspondence. Tesoro's mailing address and phone number are Tesoro Refining and Marketing Company, 3450 S. 344<sup>th</sup> Way, Ste. 100, Auburn, WA 98001 and 253-896-8700. Tesoro will assign an environmental contact for the Livermore site in the very near future. When this occurs, we will promptly notify you.

Sincerely,

Rob Donovan  
V.P., Corporate Environmental Affairs  
Tesoro Petroleum Companies, Inc.



Cc: Mr. Cecil Fox  
California Regional Water Quality Control Board  
San Francisco Bay Region  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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

RO0000434

January 18, 2002

Mr. Joe Aldridge  
Ultramar Inc.  
685 West 3<sup>rd</sup> Street  
Hanford, CA 93230

**RE: Monitoring Frequency for Beacon Station #604, 1619 W First Steet, Livermore, CA**

Dear Mr. Aldridge:

I have completed review of TRC's January 2002 *Quarterly Progress Report Fourth Quarter 2001*, prepared for the above referenced site. Based on the historic groundwater data, you may modify the sampling frequency to the following:

- quarterly monitoring of wells MW-2, MW-6, and MW-7;
- semi-annual monitoring of well MW-5 (in the first quarter of each year); and,
- discontinue monitoring of wells MW-1, MW-3, and MW-4.

In June 2001 I approved a workplan for the installation of three off-site groundwater monitoring wells. To date, I have not received information that the proposed wells were installed. If the wells have not been installed, field work must commence within 60 days of the date of this letter, **or by March 25, 2002**. If the work was completed, a report is due within 30 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.**

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

eva chu  
Hazardous Materials Specialist

email: Tracy Walker

beacon604-11

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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

RO0000434

June 15, 2001

Mr. Joe Aldridge  
Ultramar Inc.  
685 West 3<sup>rd</sup> Street  
Hanford, CA 93230

**RE: Workplan Approval for Beacon Station #604, 1619 W First Steet, Livermore, CA**

Dear Mr. Aldridge:

I have completed review of Doulos Environmental, Inc's April 2001 *Work Plan for Additional Subsurface Assessment Activities* prepared for the above referenced site. The proposal to install three off-site groundwater monitoring wells is acceptable. Field work should commence within 60 days of the date of this letter. Please provide 72 hours advance notice of field activities.

Please be advised that we are not in receipt of any groundwater monitoring reports since fourth quarter 1999. At a minimum you must reinstate semi-annual sampling of wells MW-2, MW-6, and MW-7. Groundwater monitoring should be conducted in the first and third quarters of each year.

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

eva chu  
Hazardous Materials Specialist

c: Richard Munsch, Doulos, 1704 Via Riata, Roseville, CA 95747

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

StID 4032

November 1, 2000

Mr. Joe Aldridge

Ultramar Inc.

525 West Third Street *685 West 3rd st.*  
Hanford, CA 93230

**RE: Offsite Groundwater Monitoring Well(s) for Beacon Station #604,  
1619 W 1<sup>st</sup> Street, Livermore, CA**

Dear Mr. Aldridge:

In September and October 1995 offsite dual-phase extraction wells were installed at the Livermore Arcade Shopping Center/Safeway parking lot to remediate the contaminant plume migrating from the above referenced site. By January 1997, the remediation system was turned off when soil vapor data showed only low hydrocarbon levels were being recovered. Groundwater samples collected from two of the vapor extraction wells (MW-W and MW-E) in December 1998 identified up to 23,000ppb TPHg and 7,600ppb benzene. And in November 1999 the vapor extraction wells were decommissioned by pressure grouting with a neat cement slurry.

Before this Agency approved the abandonment of the vapor wells, it was agreed with Mr. Terry Fox, of Ultramar, that replacement groundwater monitoring wells will be installed offsite to monitor the contaminant plume. At this time, please submit a workplan for the installation of replacement groundwater monitoring wells at the Livermore Arcade Shopping Center/Safeway. The workplan is due within 60 days of the date of this letter, or by **January 3, 2000.**

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

eva chu

Hazardous Materials Specialist

c: Dale van Dam, El Dorado Environmental, 2221 Goldorado Trail, El Dorado, CA  
95623

beacon604-9

# Ultramar

Ultramar, Inc.  
P.O. Box 466  
525 W. Third Street  
Hanford, CA 93232-0466  
(209) 582-0241

RECEIVED  
PROTECTION  
20 MAR 11 PM 2:51

Telecopy: 209-585-5685 Credit  
209-583-3330 Administrative  
209-583-3302 Information Services  
209-583-3358 Accounting

3/24/98 - Review RBCA. Looks like 6W SSTL is  
w/3,000ppb. Ask to do 2 more @ two. If  
conc. remains < 3,000ppb, then look at  
closure; if > 3k, reduce sampling

March 9, 1998

Ms. Eva Chu  
Department of Environmental Health  
Alameda County Health Care Services  
1131 Harbor Bay Parkway, Room 250  
Alameda, CA 94502-6577

**SUBJECT: BEACON STATION NO. 604 AND FORMER BEACON STATION  
NO. 719, LIVERMORE, CALIFORNIA**

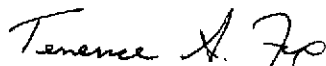
Dear Ms. Chu:

This correspondence is to confirm our telephone conversation on today's date in which you approved Ultramar's request to implement the non-purge method at the two above-referenced sites.

Please call if you have any questions regarding this site.

Sincerely,

**ULTRAMAR INC.**



Terrence A. Fox  
Senior Project Manager  
Marketing Environmental Department

cc: Mr. Cecil Fox, San Francisco Bay Region, RWQCB  
Walter and Dorothy Anderson, 1091 Buckingham Drive, Los Altos, CA  
94024  
Mr. Leon Crane, BDM, 7840 Madison Avenue, #185, Fair Oaks, CA  
95628



A Member of the Ultramar Group of Companies

**BEACON**  
#1 Quality and Service

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



ARNOLD PERKINS, DIRECTOR  
RAFAT A. SHAHID, DEPUTY 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 4032

January 26, 1996

Mr. Terrence Fox  
Ultramar  
525 W. Third Street  
Hanford, CA 93230

RE: Reduced Sampling Frequency at 1619 1st Street, Livermore

Dear Mr. Fox:

I have completed review of El Dorado Environmental, Inc's January 1996 Third Quarter 1995 Ground Water Monitoring Report for the above referenced site. Groundwater monitoring wells MW-3 and MW-4 have been exhibiting trace to non-detectable levels of petroleum hydrocarbons since April 1994. At this time, you may discontinue the sampling of these wells.

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

Sincerely,

eva chu  
Hazardous Materials Specialist

cc: files

MP

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

StID 4032

January 13, 1995

Mr. Terrence Fox  
Ultramar  
525 W. Third Street  
Hanford, CA 93230

ALAMEDA COUNTY-ENV. HEALTH DEPT.  
ENVIRONMENTAL PROTECTION DIV.  
1131 HARBOR BAY PKWY., #250  
ALAMEDA CA 94502-6577  
(510)567-6700

**RE: Workplan Approval for Interim Remedial Action at Beacon  
Station No. 604, 1619 W. First St, Livermore 94550**

Dear Mr. Fox:

I have completed review of Acton Mickelson van Dam's December 1994 Remedial Action Plan for the above referenced site. The proposal to implement groundwater extraction from wells on- and off-site to control the contaminant plume, and to perform soil vapor extraction on-site is acceptable. Field work should commence within 60 days of the date of the letter, or **by March 14, 1995.**

Be advised that additional monitoring wells will also be required to delineate the extent of the plume, up-, cross-, and down-gradient. A workplan for this work should also be submitted for review by March 14, 1995.

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

Sincerely,

eva chu  
Hazardous Materials Specialist

cc: Dale van Dam, AMV, 4511 Golden Foothill Pkwy, Suite 1,  
El Dorado Hills, CA 95762  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program

StID 4032

September 26, 1994

Mr. Terrence Fox  
Ultramar  
525 W. Third St  
Hanford, CA 93230

1131 HARBOR BAY PKWY., #250  
ALAMEDA CA 94502-6577  
(510)567-6700

RE: QMRs for Beacon # 604, 1619 1st St, Livermore 94550

Dear Mr. Fox:

This office is not in receipt of the quarterly monitoring report for the sampling event which should have occurred in July 1994, nor a report documenting the site assessment performed at the Livermore Arcade Shopping Center property. Technical reports are due usually within 60 days upon completion of field work.

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.

Our office has moved to 1131 Harbor Bay Parkway, Alameda, CA 94502. Should you have any questions, please contact me at (510) 567-6762.

eva chu  
Hazardous Materials Specialist

cc: John Mello, AMV, 4511 Golden Foothill Pkwy, Suite 1,  
El Dorado Hills, CA 95762  
files



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 4032

November 9, 1993

Mr. Terrence Fox  
Ultramar  
525 W. Third St  
Hanford, CA 93230

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

**Subject: Workplan Approval for Additional Monitoring Wells at  
Beacon #604, 1619 1st St., Livermore 94550**

Dear Mr. Fox:

I have completed review of Acton-Mickelson-van Dam's October 12, 1993 Work Plan to Install Additional Monitoring Wells at the above referenced site. The plan is acceptable and field activities should commence **within 45 days** of the date of this letter. Please note that this plan will not delineate the plume beyond monitoring well MW-1, in the upgradient direction. The initial water sample from this well exhibited 87,000 ppb TPH-G and 8,000 ppb benzene. If this trend continues in the upcoming sampling quarter, additional investigations will be required to further determine the extent of groundwater contamination.

Please notify this office at least 48 hours prior to the start of field work. If you have any questions or comments, I can be reached at (510) 271-4530.

Sincerely,

eva chu  
Hazardous Materials Specialist

cc: Dale van Dam, AMV, 5090 Robert J. Mathews Parkway, Suite 4,  
El Dorado Hills, CA 95762  
files

beacon1.4

**Ultramar**

93 OCT 21 PM 2:42

**Ultramar Inc.**  
P.O. Box 466  
525 W. Third Street  
Hanford, CA 93232-0466  
(209) 582-0241

Telecopy: 209-584-6113 Credit & Wholesale  
209-583-3330 Administrative  
209-583-3302 Information Services  
209-583-3358 Accounting

October 18, 1993

Ms. Eva Chu  
Department of Environmental Health  
Alameda County Health Care Services  
80 Swan Way, Room 200  
Oakland, CA 94612

**SUBJECT: BEACON STATION NO. 604, 1619 FIRST STREET, LIVERMORE,  
CALIFORNIA**

Dear Ms. Chu:

Enclosed is a copy of the report on the workplan for additional assessment at the above-referenced Ultramar facility. Ultramar is anxious to begin work at this site so your rapid review of the workplan would be appreciated.

Please call if you have any questions regarding this site.

Sincerely,

**ULTRAMAR INC.**

*Terrence A. Fox*  
Terrence A. Fox  
Senior Project Manager  
Marketing Environmental Department

cc: Alameda County Local Coordinator, San Francisco Bay Region,  
RWQCB



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**BEACON**  
#1 Quality and Service

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

StID 4032

October 1, 1993

Mr. Terrence Fox  
Ultramar  
P.O.Box 406  
Hanford, CA 93232-0466

**Subject: Additional Investigation at Beacon Station No. 604,  
1619 First St., Livermore 94550**

Dear Mr. Fox:

I have completed review of Acton, Michelson, Van Dam, Inc's Soil and Ground Water Investigation report, dated August 6, 1993, for the above referenced site. This report summarizes the results of soil boring, groundwater monitoring well and vapor extraction well installation, and soil and groundwater sampling performed. The areal extent of soil contaminated with less than 100 ppm TPH-G has been determined. However, groundwater contamination has not been delineated with the work performed to date.

At this time additional investigation offsite is required to determine the extent of groundwater contamination resulting from the fuel release from the former underground storage tanks at this site. Please submit a workplan for further assessment **within 45 days of the date of this letter**. Information gathered by this investigation will be used to determine an appropriate course of action to remediate the site.

If you have any questions or comments, please contact me at the above number.

Sincerely,

A handwritten signature in cursive script, appearing to read "Eva Chu".

eva chu  
Hazardous Materials Specialist

cc: files

beacon3

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

StID 4032

March 13, 1993

Mr. Terrence Fox  
Ultramar  
P.O.Box 466  
Hanford, CA 93232-0466

**Subject: Workplan for Soil and Water Investigation at Beacon  
Station No. 604, 1619 First St., Livermore 94550**

Dear Mr. Fox:

This office has reviewed the Work Plan for Drilling and Well Installation, dated February 24, 1993, for the above referenced site. This plan does not include the installation of a downgradient well within 10 feet of the UST pit, as required when a confirmed release of petroleum products has occurred which may have impacted groundwater. However, this can be performed after gradient is established with the three monitoring wells you plan to install. Another soil boring 10-15' south of the existing 12,000 gallon UST may be prudent at this time to better determine the lateral extent of soil contamination on site.

The proposed workplan is acceptable and field work should commence within 45 days of the date of this letter. Also update this office periodically on the status of stockpile soil remediation occurring at the Hanford facility. Final characterization and disposition of this soil must be documented in a report and submitted to this office.

Please notify this office 48 hours prior to the start of field activities. If you have any questions or modifications to the workplan, please contact me at (510) 271-4530.

Sincerely,

eva chu  
Hazardous Materials Specialist

cc: Sumadhu Arigala, RWQCB  
Steven Gable, Delta Environmental, 3330 Data Dr, Suite 100,  
Rancho Cordova, CA 95670  
Danielle Stefani, Livermore Fire Department  
Edgar Howell/files

beacon2

BP 1619 - 1st St LUGIWA  
CONCERNS of WP.

- 1) more SB should be around contaminated area to determine extent of contam.
- 2) 1 down grad. well where 10' of pit is necessary.
- 3) other wells could be piezometers for GW monitoring.
- 4) update on site specific remediat. at Hanford

# Ultramar

**Ultramar Inc.**  
P.O. Box 466  
525 W. Third Street  
Hanford, CA 93232-0466  
(209) 582-0241

Telecopy: 209-584-6113 Credit & Wholesale  
209-583-3330 Administrative  
209-583-3302 Information Services  
209-583-3358 Accounting

March 1, 1993

Ms. Eva Chu  
Department of Environmental Health  
Alameda County Health Care Services  
80 Swan Way, Room 200  
Oakland, CA 94612

**SUBJECT: BEACON STATION NO. 604, 1619 FIRST STREET, LIVERMORE,  
CALIFORNIA**

Dear Ms. Chu:

Enclosed is a copy of the Work Plan for additional assessment at the above-referenced Ultramar facility. Please call if you have any questions regarding this site.

Sincerely,

**ULTRAMAR INC.**



Terrence A. Fox  
Senior Project Manager  
Marketing Environmental Department



A Member of the Ultramar Group of Companies

**BEACON**  
#1 Quality and Service

# Ultramar

**Ultramar Inc.**  
P.O. Box 466  
525 W. Third Street  
Hanford, CA 93232-0466  
(209) 582-0241

Telecopy: 209-584-6113 Credit & Wholesale  
209-583-3330 Administrative  
209-583-3302 Information Services  
209-583-3358 Accounting

February 11, 1993

Ms. Eva Chu  
Alameda County Health Agency  
Division of Hazardous Materials  
80 Swan Way Rm 200  
Oakland CA 94621

**SUBJECT: BEACON STATION NO. 604, 1619 FIRST STREET, LIVERMORE, CA**


Dear Ms. Chu:

Please find enclosed for your review and files an Underground Storage tank Unauthorized Release Report for the above-referenced Ultramar facility.

Please do not hesitate to call if you have any questions regarding this information.

Sincerely,

**ULTRAMAR INC.**

  
Terrence A. Fox  
Senior Project Manager  
Marketing Environmental

TAF/jj

Enclosure



# UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I AM A DESIGNATED GOVERNMENT EMPLOYEE AND THAT I HAVE REPORTED THIS INFORMATION TO LOCAL OFFICIALS PURSUANT TO SECTION 25180.7 OF THE HEALTH AND SAFETY CODE. SIGNED: <i>[Signature]</i> DATE: 2/10/93	
REPORT DATE 0 M 2 D 1 D 9 Y 3 Y		CASE #			
REPORTED BY	NAME OF INDIVIDUAL FILING REPORT <b>TERREUCE FOX</b>		PHONE <b>(209) 583-5545</b>	SIGNATURE <i>Terrence A. Fox</i>	
	REPRESENTING <input type="checkbox"/> LOCAL AGENCY <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> OTHER		COMPANY OR AGENCY NAME <b>ULTRAMAR</b>		
	ADDRESS <b>525 W. THIRD ST. HANFORD CA 93230</b>				
RESPONSIBLE PARTY	NAME <b>ULTRAMAR</b> <input type="checkbox"/> UNKNOWN		CONTACT PERSON <b>TERREUCE FOX</b>	PHONE <b>(209) 583-5545</b>	
	ADDRESS <b>525 W. THIRD ST. HANFORD CA 93230</b>				
SITE LOCATION	FACILITY NAME (IF APPLICABLE) <b>BEACON STATION "604"</b>		OPERATOR <b>ULTRAMAR</b>	PHONE <b>(209) 583-5545</b>	
	ADDRESS <b>1619 W. FIRST ST. LIVERMORE ALAMEDA 94550</b>				
	CROSS STREET <b>"P" STREET</b>	TYPE OF AREA <input checked="" type="checkbox"/> COMMERCIAL <input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> RURAL <input type="checkbox"/> RESIDENTIAL <input type="checkbox"/> OTHER		TYPE OF BUSINESS <input checked="" type="checkbox"/> RETAIL FUEL STATION <input type="checkbox"/> FARM <input type="checkbox"/> OTHER	
IMPLEMENTING AGENCIES	LOCAL AGENCY AGENCY NAME <b>ALAMEDA CO. ENVIRONMENT HEALTH</b>		CONTACT PERSON <b>EVA CHU</b>	PHONE <b>(415) 271-4320</b>	
	REGIONAL BOARD <b>SAN FRANCISCO BAY REGION</b>			PHONE <b>(415) 464-1255</b>	
SUBSTANCES INVOLVED	(1) NAME <b>GASOLINE</b>		QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> _____		
	(2)		<input type="checkbox"/> UNKNOWN		
DISCOVERY/ABATEMENT	DATE DISCOVERED 1 M 1 D 0 Y 2 Y	HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> TANK TEST <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> OTHER			
	DATE DISCHARGE BEGAN _____ M _____ D _____ Y _____ Y <input checked="" type="checkbox"/> UNKNOWN	METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> REMOVE CONTENTS <input checked="" type="checkbox"/> REPLACE TANK <input type="checkbox"/> CLOSE TANK <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> CHANGE PROCEDURE <input type="checkbox"/> OTHER			
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YES, DATE 1 M 1 D 0 Y 2 Y				
SOURCE/CAUSE	SOURCE OF DISCHARGE <input type="checkbox"/> TANK LEAK <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER		TANKS ONLY CAPACITY <b>1-10,000</b> <b>2-8,000</b> GAL. AGE <b>26</b> YRS <input type="checkbox"/> UNKNOWN	MATERIAL <input type="checkbox"/> FIBERGLASS <input checked="" type="checkbox"/> STEEL <input type="checkbox"/> OTHER	CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> CORROSION <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> SPILL <input type="checkbox"/> OTHER
	CHECK ONE ONLY <input checked="" type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)				
CURRENT STATUS	CHECK ONE ONLY <input checked="" type="checkbox"/> SITE INVESTIGATION IN PROGRESS (DEFINING EXTENT OF PROBLEM) <input type="checkbox"/> CLEANUP IN PROGRESS <input type="checkbox"/> SIGNED OFF (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> NO FUNDS AVAILABLE TO PROCEED <input type="checkbox"/> EVALUATING CLEANUP ALTERNATIVES				
	CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS) <input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> OTHER (OT)				
COMMENTS					



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 4032

January 29, 1993

Terrence Fox  
Ultramar Inc  
P.O.Box 466  
Hanford, CA 93232-0466

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

**Subject: Tank Closure Report for Beacon Station No. 604,  
1619 First Street, Livermore 94550**

Dear Mr. Fox:

On November 10, 1992 Ultramar had three underground storage tanks (USTs) and their associated piping removed from the above referenced site. To date we are not in receipt of a tank closure report documenting field activities and results of soil samples analyses, among others. Closure reports are due within 60 days of the date of tank removal. Please submit said report **within 10 days** of the date of this letter. If you have any questions or comments about the content of this letter, I may be reached at (510) 271-4530. If you continue to get a busy signal, try (510) 271-4320.

Sincerely,

eva chu  
Hazardous Materials Specialist

cc: ~~David Howell~~/files

beacon

# Ultramar

**Ultramar Inc.**  
P.O. Box 466  
525 W. Third Street  
Hanford, CA 93232-0466  
(209) 582-0241

ORDER NO. 101450

Telecopy: 209-584-6113 Credit & Wholesale  
209-583-3330 Administrative  
209-583-3302 Information Services  
209-583-3358 Accounting

December 15, 1992

Ms. Eva Chu  
Hazardous Materials Specialist  
Alameda County Health Agency  
Division of Hazardous Materials  
Department of Environmental Health  
80 Swan Way, Rm. 200  
Oakland, CA 94621

**SUBJECT: BEACON STATION 604, 1619 FIRST STREET, LIVERMORE, CA**

Dear Ms. Chu:

Per your request, enclosed please find photocopies of the two uniform hazardous waste manifests for the transportation and disposal of the underground tanks removed from the above-referenced Ultramar facility.

If you should have questions, please contact me at (209) 583-3347.

Sincerely,

**ULTRAMAR INC.**

*Carolyn V. Nunes*

Carolyn V. Nunes  
Environmental Coordinator,  
Marketing Environmental

/cvn

Enclosures



A Member of the Ultramar Group of Companies

**BEACON**  
#1 Quality and Service

80068

See Instructions on back of page 6.

80068

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

**UNIFORM HAZARDOUS WASTE MANIFEST**

Generator's US EPA ID No. **CAL92176474189186** Manifest Document No. **2** Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address  
**ULTRAMAR 525 WEST THIRD STREET  
 HANFORD, CALIFORNIA 93230**

A. State Manifest Document Number  
**92289186**

4. Generator's Phone **209-583-3342** Attn: **CAROL NUNES**

B. State Generator's ID

5. Transporter 1 Company Name **ERICKSON INC** 6. US EPA ID Number **CAD009466392**

C. State Transporter's ID **209173**  
 D. Transporter's Phone **510-235-1393**

7. Transporter 2 Company Name 8. US EPA ID Number

E. State Transporter's ID  
 F. Transporter's Phone

9. Designated Facility Name and Site Address  
**Erickson, Inc.  
 255 Parr Blvd.  
 Richmond, Ca 94801** 10. US EPA ID Number **CAD009466392**

G. State Facility's ID **CAD009466392**

H. Facility's Phone **(510) 235-1393**

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers No. Type 13. Total Quantity 14. Unit Wt/Vol

a. **Waste Empty Storage Tank  
 NON-RCRA Hazardous Waste Solid:**

**001 TP 10000 P**

b.

I. Waste Number State EPA/Other

c.

State EPA/Other

d.

State EPA/Other

J. Additional Descriptions for Materials Listed Above  
**Qty ONE Empty Storage Tank (a) 10,000  
 Tank (a) have been treated with 15 lbs.  
 Dry Ice per 1000 Gall Capacity  
 ONE 10,000 Gallon Steel UST**

K. Handling Codes for Wastes Listed Above  
 a. b. c. d.

15. Special Handling Instructions and Additional Information  
**SITE ADDRESS: 1619 FIRST STREET LIVERMORE, CA.  
 Keep away from sources of ignition. Always wear hardhat when working around  
 U.S.T.'s 24 Hr. Contact Name **CAROL NUNES** & Phone **(209) 583-3347****

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of the consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable federal, state and international laws.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name **Jack Stoyd** Signature **Jack Stoyd** Month **11** Day **10** Year **92**

17. Transporter 1 Acknowledgement of Receipt of Materials  
 Printed/Typed Name **Jim Cox, ERICKSON INC** Signature **Jim Cox** Month **11** Day **10** Year **92**

18. Transporter 2 Acknowledgement of Receipt of Materials  
 Printed/Typed Name Signature Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.  
 Printed/Typed Name **DAVID SATO** Signature **DAVE SATO** Month **11** Day **10** Year **92**

**DO NOT WRITE BELOW THIS LINE.**

80068

See Instructions on back of page 6.

92289187  
 IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>CA L921764741891187</b>		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.									
3. Generator's Name and Mailing Address <b>ULTRAMAR 525 WEST Third Street HANFORD, CALIFORNIA 93230</b>						A. State Manifest Document Number <b>92289187</b>											
4. Generator's Phone <b>209 583-3342</b> Attn: <b>CAROL NUNES</b>						B. State Generator's ID											
5. Transporter 1 Company Name <b>Erickson Trucking Inc.</b>						C. State Transporter's ID <b>30976</b>											
6. US EPA ID Number <b>CA D0009466392</b>						D. Transporter's Phone <b>5702351293</b>											
7. Transporter 2 Company Name						E. State Transporter's ID											
8. US EPA ID Number						F. Transporter's Phone											
9. Designated Facility Name and Site Address <b>Erickson, Inc. 255 Parr Blvd. Richmond, Ca. 94801</b>						G. State Facility's ID <b>CA D0009466392</b>											
10. US EPA ID Number <b>CA D0009466392</b>						H. Facility's Phone <b>(310) 235-1393</b>											
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total		14. Unif		15. Waste Number					
						No.		Type		Quantity		Wt/Vol		State		EPA/Other	
						a.		b.		c.		d.		e.		f.	
						Waste Empty Storage Tank		002 TP		16000		P		312		NONE	
						NON-RCRA Hazardous Waste Solid											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of the consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable federal, state and international laws.						K. Handling Codes for Wastes Listed Above											
17. Transporter 1 Acknowledgement of Receipt of Materials						18. Transporter 2 Acknowledgement of Receipt of Materials											
19. Discrepancy Indication Space						20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.											

DO NOT WRITE BELOW THIS LINE.

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH  
**Hazardous Materials Inspection Form**

II, III

white -env.health  
yellow -facility  
pink -files

Site ID # \_\_\_\_\_ Site Name Beacon 604 Today's Date 11/10/92

II.A BUSINESS PLANS (Title 19)

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

Site Address 1619 First St.

City Livermore Zip 94550 Phone \_\_\_\_\_

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

Inspection Categories:

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

II.B ACUTELY HAZ. MATLS

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

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

III. UNDERGROUND TANKS (Title 23)

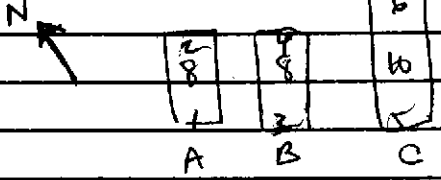
- General
- \_\_\_ 1. Permit Application 25284 (H&S)
  - \_\_\_ 2. Pipeline Leak Detection 25292 (H&S)
  - \_\_\_ 3. Records Maintenance 2712
  - \_\_\_ 4. Release Report 2651
  - \_\_\_ 5. Closure Plans 2670

- Monitoring for Existing Tanks
- \_\_\_ 6. Method
    - 1) Monthly Test
    - 2) Daily Vadose Semi-annual groundwater One time soils
    - 3) Daily Vadose One time soils Annual tank test
    - 4) Monthly Gndwater One time soils
    - 5) Daily Inventory Annual tank testing Cont pipe leak det Vadose/gndwater mon.
    - 6) Daily Inventory Annual tank testing Cont pipe leak det
    - 7) Weekly Tank Gauge Annual tank testing
    - 8) Annual Tank Testing Daily Inventory
    - 9) Other \_\_\_\_\_

- \_\_\_ 7. Precis Tank Test Date: \_\_\_\_\_ 2643
- \_\_\_ 8. Inventory Rec. 2644
- \_\_\_ 9. Soil Testing . 2646
- \_\_\_ 10. Ground Water. 2647

- New Tanks
- \_\_\_ 11. Monitor Plan 2632
  - \_\_\_ 12. Access, Secure 2634
  - \_\_\_ 13. Plans Submit Date: \_\_\_\_\_ 2711
  - \_\_\_ 14. As Built Date: \_\_\_\_\_ 2635

Comments:



B.P. St.

B-tank w/ little pitting, no obvious holes noted same scaling in waist. ~~Some~~ Crack noted in bung of fill end.

A-tank. some scaling, pitting. No obvious holes gravel in pit about 1/3 up side of tank - More pitting noted in tank at this location.

C-tank - little pitting, same scaling - no obvious holes

Present: Randy B- From Livermore  
Scott, myself - ACDEH ; Tim & Delta  
Paul Clark, Mike Stoyd Ultramar

Contact: Jake Stoyd  
Title: \_\_\_\_\_  
Signature: \_\_\_\_\_

Inspector: Eva Day  
Signature: [Signature]

II, III

white -env.health  
 yellow -facility  
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH  
 Hazardous Materials Inspection Form

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

II, III

Site ID # \_\_\_\_\_ Site Name Beacon Co. Today's Date 11/12/92

Site Address 1619 First St.

City Livermore Zip 94550 Phone \_\_\_\_\_

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

Inspection Categories:

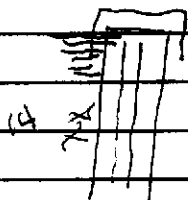
- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

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

Comments: Pager (209) 263-0511

Soil sample taken at 27' at SW corner under unlined tank.

Strong odor not typical of fresh gasoline. -  
Analyze sample for TPH-G, BTEX, &  
halogenated hydrocarbons, semi-volatile cpds -  
And pH of soil sample



II.A BUSINESS PLANS (Title 19)

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- 7. Training 25504(c)
- 8. Deficiency 25505(a)
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II.B ACUTELY HAZ. MATLS

- 10. Registration Form Filed 25533(a)
- 11. Form Complete 25533(b)
- 12. RMPP Contents 25534(c)
- 13. Implement Sch. Req'd? (Y/N) \_\_\_\_\_
- 14. OnSite Conseq. Assess. 25524(c)
- 15. Probable Risk Assessment 25534(d)
- 16. Persons Responsible 25534(g)
- 17. Certification 25534(f)
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III. UNDERGROUND TANKS (Title 23)

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

Rev 6/88

II, III

Contact: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: Jahestynd

Inspector: Evachy

Signature: Evachy

white -env.health  
 yellow -facility  
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH  
 Hazardous Materials Inspection Form

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

II, III

Site ID # \_\_\_\_\_ Site Name Beacon 604 Today's Date 11/10/92

Site Address 1619 First St.

City Livermore Zip 94 Phone \_\_\_\_\_

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

Inspection Categories:

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

2 4 6  
 3 5

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

Comments:

#3 slight odor - degraded fuel (like varnish or paint thinner) taken 1' into native soil in sandy, silty gravel, moist

#5 moderate odor like #3 14' bags 1-2' into native soil

#1 No obvious odor 14' bags

#4 sl/no obvious odor 14' bags

#2 no odor 14'

#6 no odor 14'

#1 at 16' no obvious odor

#3 at 16' no obvious odor

#5 at 16' mod odor (more like gasoline)

#5 at 19' mod " " " "

II.A BUSINESS PLANS (Title 19)

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    - 5) Daily Inventory Annual tank testing Cont pipe leak det Vadose/gndwater mon.
    - 6) Daily Inventory Annual tank testing Cont pipe leak det
    - 7) Weekly Tank Gauge Annual tank testing
    - 8) Annual Tank Testing Daily Inventory
    - 9) Other \_\_\_\_\_

- 7. Precs Tank Test Date: 2643
- 8. Inventory Rec. 2644
- 9. Soil Testing 2646
- 10. Ground Water. 2647

- New Tanks
- 11. Monitor Plan 2632
  - 12. Access. Secure 2634
  - 13. Plans Submit Date: 2711
  - 14. As Built Date: 2635

Rev 6/88

Contact: Jake Styd  
 Title: \_\_\_\_\_  
 Signature: \_\_\_\_\_

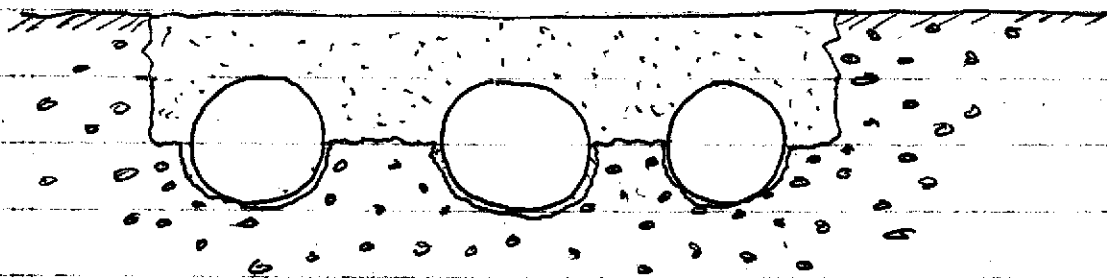
Inspector: Eva Chy  
 Signature: EW

II, III

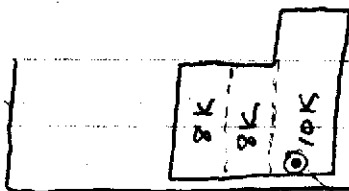
UST closure field notes

Native material - sandy gravels, sandier w/ depth, fewer  
cobbles/smaller gravel

UST beds appear to have been hogged out of  
native material, USTs set in the troughs,  
and sandy backfill ~~laid~~ laid on top and between  
tanks



1st Street



S. P Street

SW end of the  
-initial soil from below the largest (10K gallon) UST had a  
degraded product ~~odor~~, reminiscent of turpentine. AS  
the excavation was deepened from 14 to 16+ feet BG,  
the soil exhibited a sharper gasoline-like odor.  
Soil taken at the 14' depth at the NE end of the  
tank exhibited none of this odor.



# Ultramar

Ultramar Inc.  
P.O. Box 466  
525 W. Third Street  
Hanford, CA 93232-0466  
(209) 582-0241

Telecopy: 209-584-6113 Credit & Wholesale  
209-583-3330 Administrative  
209-583-3302 Information Services  
209-583-3358 Accounting

November 3, 1992

Ms. Eva Chu  
Department of Environmental Health  
Alameda County Health Care Services  
80 Swan Way, Room 200  
Oakland, CA 94612

**SUBJECT: BEACON STATION NO. 604, 1619 FIRST STREET, LIVERMORE,  
CALIFORNIA**

Dear Ms. Chu:

This correspondence is in response to our recent telephone conversation during which you requested additional information on how the soil would be handled if it was brought to Ultramar's Hanford refinery facility. First, the soil would only be brought to Hanford if the concentrations were such that the soil would not be able to be used as backfill material at some offsite location (assuming very low to not detected concentrations and only with the County's approval) or was not acceptable to a local landfill (typically less than 100 ppm TPH). The soil would be brought to Hanford if the concentrations were between 100 ppm and 1,000 ppm. Any soil containing concentrations over 1,000 ppm TPH will be either self-certified by Ultramar as nonhazardous utilizing our knowledge of the contaminant and transported to the Hanford facility or taken to an appropriate disposal facility.

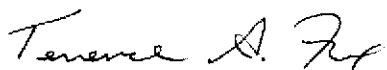
If soil is transported to Hanford, it will be placed on an impermeable surface (either asphalt or plastic) and spread in three-foot lifts. The soil will be tilled occasionally and sampled periodically to determine the progress of the aeration. The aerating soil will be covered with plastic if rain is forecasted to ensure that runoff from the stockpile does not occur.

Once aeration is completed, the soil will either be transported to a Class III landfill for disposal or used as backfill on the Ultramar property.

Ultramar hopes that this information meets your needs. Please call if you have any questions regarding this site.

Sincerely,

**ULTRAMAR INC.**



Terrence A. Fox  
Senior Project Manager  
Marketing Environmental Department



A Member of the Ultramar Group of Companies

**BEACON**  
#1 Quality and Service

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

*approved by email 10/29/92*

ACCEPTED

DEPARTMENT OF ENVIRONMENTAL HEALTH  
 470 - 27th Street, Third Floor  
 Oakland, CA 94612  
 Telephone: (415) 874-7237

These plans have been reviewed and found to be acceptable and essentially meet the requirements of State and local health laws. Changes to your plans indicated by this Department are to assure compliance with State and local laws. The project proposed herein is now released for issuance of any required building permits for construction. One copy of these accepted plans must be on the job site available to all contractors and craftsmen involved with the removal.

Any change or alterations of these plans and specifications must be submitted to this Department and to the Fire and Building Inspection Department to determine if such changes meet the requirements of State and local laws. Notify this Department at least 48 hours prior to the following required inspections:

- \_\_\_\_\_ Removal of Tank and Piping
- \_\_\_\_\_ Sampling
- \_\_\_\_\_ Final Inspection

Issuance of a permit to operate is dependent on compliance with accepted plans and all applicable laws and regulations.

THERE IS A FINANCIAL PENALTY FOR NOT OBTAINING THESE INSPECTIONS.

**UNDERGROUND TANK CLOSURE PLAN**

**\*\*\* Complete according to attached instructions \*\*\***

1. Business Name BEACON # 604  
 Business Owner ULTRAMAR INC
  2. Site Address 1619 FIRST ST.  
 City LIVERMORE Zip 94550 Phone (510) 443-7465
  3. Mailing Address 525 W. THIRD ST.  
 City HANFORD, CA Zip 93230 Phone (209) 583-3342
  4. Land Owner ULTRAMAR INC.  
 Address 525 W. THIRD ST. City, State HANFORD, CA Zip 93230
  5. Generator name under which tank will be manifested ULTRAMAR INC.
- EPA I.D. No. under which tank will be manifested CA 921764741

6. Contractor WALTON ENGINEERING, INC  
Address 837 RISKE LN.  
City W. SACRAMENTO, CA <sup>95691</sup> Phone 916-372-1888  
License Type\* A, B, HAZ ID# 617238

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

7. Consultant DELTA ENVIRONMENTAL CONSULTANTS  
Address 3333 DATA DRIVE #100  
City RANCHO CORDOVA CA Phone (916) 638-2085

8. Contact Person for Investigation  
Name TERRENCE FOX/ULTRAMAR Title SENIOR PROJECT MANAGER  
Phone (214) 583-5545

9. Number of tanks being closed under this plan 3  
Length of piping being removed under this plan 100' ±  
Total number of tanks at facility 3

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

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

a) Product/Residual Sludge/Rinsate Transporter

Name ERICKSON, INC. EPA I.D. No. CAD009466392  
Hauler License No. 0019 License Exp. Date NONE  
Address 255 PARR BLVD.  
City RICHMOND State CA Zip 94801

b) Product/Residual Sludge/Rinsate Disposal Site

Name ERICKSON, INC EPA I.D. No. SAME AS ABOVE  
Address 255 PARR BLVD  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

c) Tank and Piping Transporter

Name ERICKSON, INC EPA I.D. No. SAME  
Hauler License No. \_\_\_\_\_ License Exp. Date \_\_\_\_\_  
Address 255 PAIR BLVD.  
City RICHMOND, State CA Zip 94801

d) Tank and Piping Disposal Site

Name SAME AS (a) EPA I.D. No. \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

11. Experienced Sample Collector

Name \_\_\_\_\_  
Company DELTA ENVIRONMENTAL CONSULTANTS  
Address 3330 DATA DRIVE # 100  
City PANCHO CORDOVA State CA Zip 95670 Phone (916) 638-2045

12. Laboratory

Name WEST ENVIRONMENTAL ANALYTICAL  
Address 1046 OLIVE DRIVE #3  
City DAVIS State CA Zip 95616  
State Certification No. 1346

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

If yes, describe. VENT LINE LEAK IN 1988 - REPAIRED

14. Describe methods to be used for rendering tank inert

TRIPLE RINSE AND VACUUM / DRY ICE; MINIMUM 25 POUNDS  
OF SOLID CARBON DIOXIDE FOR EACH 1,000 GALLONS  
OF TANK CAPACITY

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

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

15. Tank History and Sampling Information

Tank		Material to be sampled (tank contents, soil, ground-water, etc.)	Location and Depth of Samples
Capacity	Use History (see instructions)		
* 10,000	THE TANKS CURRENTLY STORE UNLEADED PRODUCTS BUT LIKELY STORED LEADED PRODUCTS IN THE PAST. AVL GASOLINE - NO DIESEL	SOIL	BENEATH EACH TANK END APPROX. 2' INTO NATIVE SOIL
* 8,000		SOIL	
* 8,000		SOIL	
* ALL TANKS CURRENTLY IN USE ;		INSTALLED	IN 1966

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

Excavated/Stockpiled Soil	
Stockpiled Soil Volume (Estimated)	Sampling Plan 1 COMPOSITE SAMPLE OF 4 SAMPLES FOR EVERY 50 YARDS

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

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

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

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit
LEADED GAS UNLEADED GAS		TPHQ GC/FID(5030) BTEX 8020 TOTAL LEAD AA	1.0 PPM 0.005 PPM

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

18. Submit Worker's Compensation Certificate copy

Name of Insurer UNICARE INSURANCE CO.

POLICY # UAOZ - 1291 - 06069

19. Submit Plot Plan (See Instructions)

20. Enclose Deposit (See Instructions)

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

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

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

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

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

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

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

Signature of Contractor

Name (please type) ~~PAUL CLARK~~ MICHAEL E. WALTON

Signature  PRESIDENT

Date 10/23/92

Signature of Site Owner or Operator

Name (please type) PAUL CLARK SENIOR ENGINEER

Signature 

Date 9/29/92

## INSTRUCTIONS

### General Instructions

- \* Three (3) copies of this plan plus attachments and deposit must be submitted to this Department.
- \* Any cutting into tanks requires local fire department approval.
- \* One complete copy of your approved plan must be at the construction site at all times; a copy of your approved plan must also be sent to the landowner.
- \* State of California Permit Application Forms A and B are to be submitted to this office. One Form A per site, one Form B for each removed tank.

### Item Specific Instructions

2. SITE ADDRESS  
Address at which closure is taking place.
5. EPA I.D. NO. under which the tanks will be manifested  
EPA I.D. numbers may be obtained from the State Department of Health Services, 916/324-1781.
6. CONTRACTOR  
Prime contractor for the project.
10. STATE REGISTERED HAZARDOUS WASTE TRANSPORTERS/FACILITIES
  - a) All residual liquids and sludges are to be removed from tanks before tanks are inerted.
  - c) Tanks must be hauled as hazardous waste.
  - d) This is the place where tanks will be taken for cleaning.
15. TANK HISTORY AND SAMPLING INFORMATION

Use History - This information is essential and must be accurate. Include tank installation date, products stored in the tank, and the date when the tank was last used.

Material to be sampled - e.g. water, oil, sludge, soil, etc.

Location and depth of samples - e.g. beneath the tank a maximum of two feet below the native soil/backfill interface, side wall at the high water mark, etc.



16. CHEMICAL METHODS AND ASSOCIATED DETECTION LIMITS

See attached Table 2.

17. SITE HEALTH AND SAFETY PLAN BY CONTRACTOR

A site specific Health and Safety plan must be submitted. We advocate the site health and safety plan include the following items, at a minimum:

- a) The name and responsibilities of the site health and safety officer;
- b) An outline of briefings to be held before work each day to appraise employees of site health and safety hazards;
- c) Identification of health and safety hazards of each work task. Include potential fire, explosion, physical, and chemical hazards;
- d) For each hazard, identify the action levels (contaminant concentrations in air) or physical conditions which will trigger changes in work habits to ensure workers are not exposed to unsafe chemical levels or physical conditions;
- e) Description of the work habit changes triggered by the above action levels or physical conditions;
- f) Frequency and types of air and personnel monitoring - along with the environmental sampling techniques and instrumentation - to be used to detect the above action levels. Include instrumentation maintenance and calibration methods and frequencies;
- g) Confined space entry procedures (if applicable);
- h) Decontamination procedures;
- i) Measures to be taken to secure the site, excavation and stockpiled soil during and after work hours (e.g. barricades, caution tape, fencing, trench plates, plastic sheeting, security guards, etc.);
- j) Spill containment/emergency/contingency plan. Be sure to include emergency phone numbers, the location of the phone nearest the site, and directions to the hospital nearest the site;
- k) Documentation that all site workers have received the appropriate OSHA approved trainings and participate in appropriate medical surveillance per 29 CFR 1910.120; and
- l) Page for employees to sign indicating they have read and will comply with the site health and safety plan.

The safety plan must be distributed to all employees and contractors working in hazardous waste operations on site. A complete copy of the site health and safety plan along with any standard operating procedures shall be on site and accessible at all times.

NOTE: These requirements are excerpts from 29 CFR Part 1910.120(b)(4), Hazardous Waste Operations and Emergency Response; Final Rule, March 6, 1989. Safety plans of certain underground tank sites may need to meet the complete requirements of this Rule.

19. PLOT PLAN

The plan should consist of a scaled view of the facility at which the tank(s) are located and should include the following information:

- a) Scale;
- b) North Arrow;
- c) Property Lines;
- d) Location of all Structures;
- e) Location of all relevant existing equipment including tanks and piping to be removed and dispensers;
- f) Streets;
- g) Underground conduits, sewers, water lines, utilities;
- h) Existing wells (drinking, monitoring, etc.);
- i) Depth to ground water; and
- j) All existing tanks and piping in addition to the ones being pulled.

20. DEPOSIT

A deposit, payable to Alameda County for the amount indicated on the Alameda County Underground Storage Tank Fee Schedule, must accompany the plans.

21. Blank Unauthorized Leak/Contamination Site Report forms may be obtained in limited quantities from our office and from the San Francisco Bay Regional Water Quality Control Board (415/464-1255). Larger quantities may be obtained directly from the State Water Resources Control Board at (916) 739-2421.

22. TANK CLOSURE REPORT

The tank closure report should contain the following information:

- a) General description of the closure activities;
- b) Description of tank, fittings and piping conditions. Indicate tank size and former contents; note any corrosion, pitting, holes, etc.;

white -env.health  
 yellow -facillty  
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH  
 Hazardous Materials Inspection Form

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

II, III

Site ID # \_\_\_\_\_ Site Name Beacon 604 Today's Date 11/10/92

II.A BUSINESS PLANS (Title 19)

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

Site Address 1619 First St

City Livermore Zip 94550 Phone \_\_\_\_\_

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

Inspection Categories:

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

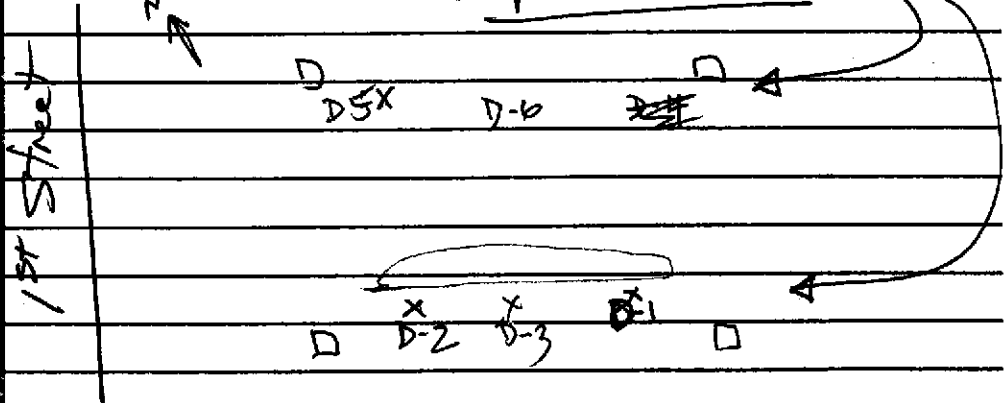
II.B ACUTELY HAZ. MATLS

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

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

Comments:

Dispensor islands



III. UNDERGROUND TANKS (Title 23)

- General
- \_\_\_ 1. Permit Application 25284 (H&S)
  - \_\_\_ 2. Pipeline Leak Detection 25292 (H&S)
  - \_\_\_ 3. Records Maintenance 2712
  - \_\_\_ 4. Release Report 2651
  - \_\_\_ 5. Closure Plans 2670

- Monitoring for Existing Tanks
- \_\_\_ 6. Method
    - 1) Monthly Test
    - 2) Daily Vadose Semi-annual groundwater One time soils
    - 3) Daily Vadose One time soils Annual tank test
    - 4) Monthly Gndwater One time soils
    - 5) Daily Inventory Annual tank testing Cont pipe leak det Vadose/gndwater man.
    - 6) Daily Inventory Annual tank testing Cont pipe leak det
    - 7) Weekly Tank Gauge Annual tank testing
    - 8) Annual Tank Testing Daily inventory
    - 9) Other \_\_\_\_\_

- \_\_\_ 7. Precs Tank Test Date: \_\_\_\_\_ 2643
- \_\_\_ 8. Inventory Rec. 2644
- \_\_\_ 9. Soil Testing . 2646
- \_\_\_ 10. Ground Water. 2647

- New Tanks
- \_\_\_ 11. Monitor Plan 2632
  - \_\_\_ 12. Access. Secure 2634
  - \_\_\_ 13. Plans Submit Date: \_\_\_\_\_ 2711
  - \_\_\_ 14. As Built Date: \_\_\_\_\_ 2635

Analyze all samples for TPH-G, BTEX, and total organic lead - for west end - tank 10K, and middle tank

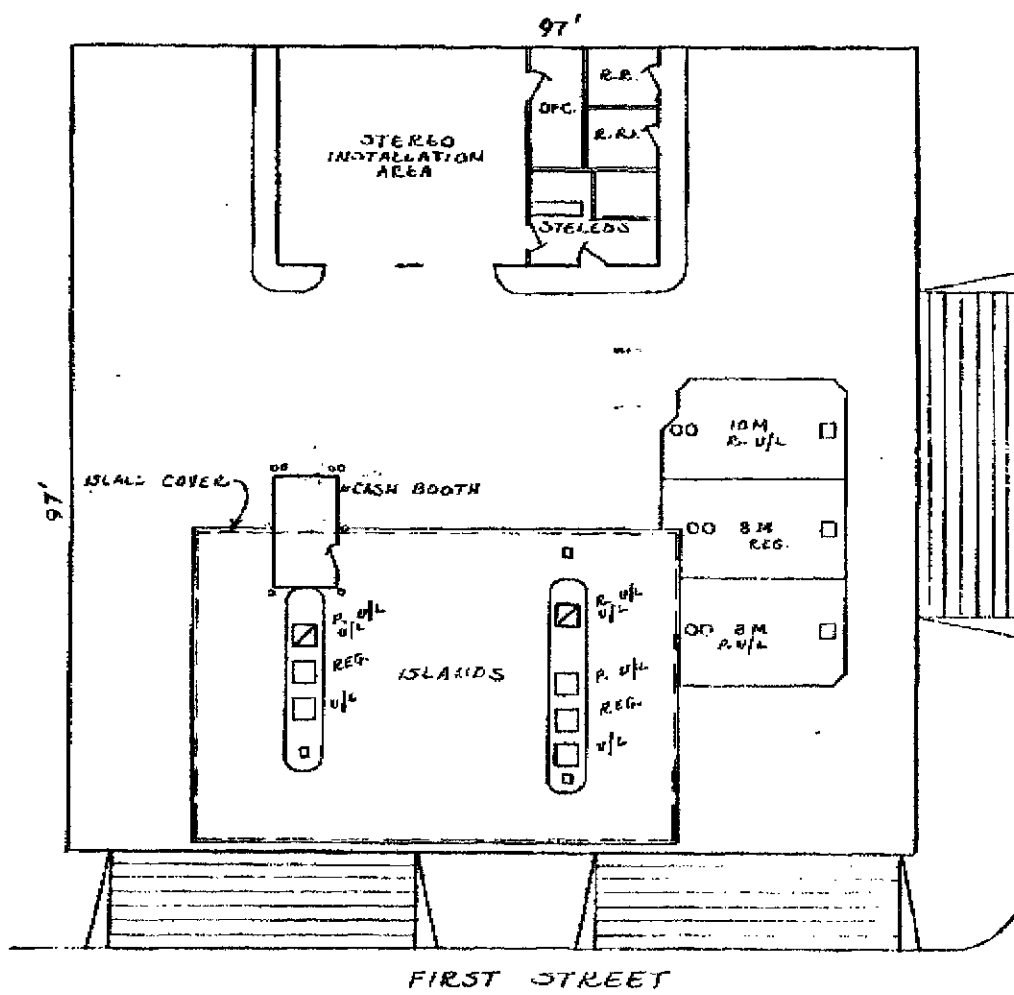
D-1. No obvious odor  
 D-2 slight odor (dull)  
 D-3 NO obvious odor  
 D-5 slight odor (dull)  
 D-6 slight odor (dull)

Rev 5/88

Contact: Jake Stuyd  
 Title: \_\_\_\_\_  
 Signature: \_\_\_\_\_

Inspector: Esachy  
 Signature: [Signature]

II, III



<b>BEACON OIL COMPANY</b>		
325 WEST THIRD STREET, HANFORD, CALIFORNIA 93230		
SCALE: 3/4" = 10'-0"	APPROVED BY:	DRAWN BY: MAX JH
DATE: 10/29/84		REVISED:
LOCATION: 1019 FIRST STREET LIVERMORE, CA		
SITE PLAN		DRAWING NUMBER 604

- c) Description of the excavation itself. Include the tank and excavation depth, a log of the stratigraphic units encountered within the excavation, a description of root holes or other potential contaminant pathways, the depth to any observed ground water, descriptions and locations of stained or odor-bearing soil, and descriptions of any observed free product or sheen;
- d) Description of sampling methods;
- e) Description of any remedial measures conducted at the time of tank removal;
- f) To-scale figures showing the excavation size and depth, nearby buildings, sample locations and depths, and tank and piping locations. Include a copy of the plot plan prepared for the Tank Closure Plan under item 19;
- g) Chain of custody records;
- h) Copies of signed laboratory reports;
- i) Copies of "TSDF to Generator" Manifests for all hazardous wastes hauled offsite (sludge, rinsate, tanks and piping, contaminated soil, etc.); and
- j) Tabulation of the volume and final destination of all non-manifested contaminated soil hauled offsite.

**TABLE #2**  
**RECOMMENDED MINIMUM VERIFICATION ANALYSES FOR**  
**UNDERGROUND TANK LEAKS**

<u>HYDROCARBON LEAK</u>	<u>SOIL ANALYSIS</u>		<u>WATER ANALYSIS</u>	
Unknown Fuel	TPH G	GCFID(5030)	TPH G	GCFID(5030)
	TPH D	GCFID(3550)	TPH D	GCFID(3510)
	BTX&E	8020 or 8240	BTX&E	602, 624 or 8260
	TPH AND BTX&E	8260		
Leaded Gas	TPH G	GCFID(5030)	TPH G	GCFID(5030)
	BTX&E	8020 OR 8240	BTX&E	602 or 624
	TPH AND BTX&E	8260	TOTAL LEAD AA	
	TOTAL LEAD AA			
	-----Optional-----			
	TEL	DHS-LUFT	TEL	DHS-LUFT
	EDB	DHS-AB1803	EDB	DHS-AB1803
Unleaded Gas	TPH G	GCFID(5030)	TPH G	GCFID(5030)
	BTX&E	8020 or 8240	BTX&E	602, 624 or 8260
	TPH AND BTX&E	8260		
Diesel, Jet Fuel and Kerosene	TPH D	GCFID(3550)	TPH D	GCFID(3510)
	BTX&E	8020 or 8240	BTX&E	602, 624 or 8260
	TPH AND BTX&E	8260		
Fuel/Heating Oil	TPH D	GCFID(3550)	TPH D	GCFID(3510)
	BTX&E	8020 or 8240	BTX&E	602, 624 or 8260
	TPH AND BTX&E	8260		
Chlorinated Solvents	CL HC	8010 or 8240	CL HC	601 or 624
	BTX&E	8020 or 8240	BTX&E	602 or 624
	CL HC AND BTX&E	8260	CL HC AND BTX&E	8260
Non-chlorinated Solvents	TPH D	GCFID(3550)	TPH D	GCFID(3510)
	BTX&E	8020 or 8240	BTX&E	602 or 624
	TPH AND BTX&E	8260	TPH and BTX&E	8260
Waste and Used Oil or Unknown (All analyses must be completed and submitted)	TPH G	GCFID(5030)	TPH G	GCFID(5030)
	TPH D	GCFID(3550)	TPH D	GCFID(3510)
	TPH AND BTX&E	8260		
	O & G	5520 D & F	O & G	5520 C & F
	BTX&E	8020 or 8240	BTX&E	602, 624 or 8260
	CL HC	8010 or 8240	CL HC	601 or 624
	ICAP or AA TO DETECT METALS: Cd, Cr, Pb, Zn, Ni			
	METHOD 8270 FOR SOIL OR WATER TO DETECT:			
	PCB*		PCB	
	PCP*		PCP	
	PNA		PNA	
	CREOSOTE		CREOSOTE	

\* If found, analyze for dibenzofurans (PCBs) or dioxins (PCP)

Reference: Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, 10 August 1990

**EXPLANATION FOR TABLE #2: MINIMUM VERIFICATION ANALYSIS**

1. OTHER METHODOLOGIES are continually being developed and as methods are accepted by EPA or DHS, they also can be used.
2. For DRINKING WATER SOURCES, EPA recommends that the 500 series for volatile organics be used in preference to the 600 series because the detection limits are lower and the QA/QC is better.
3. APPROPRIATE STANDARDS for the materials stored in the tank are to be used for all analyses on Table #2. For instance, seasonally, there may be five different jet fuel mixtures to be considered.
4. To AVOID FALSE POSITIVE detection of benzene, benzene-free solvents are to be used.
5. TOTAL PETROLEUM HYDROCARBONS (TPH) as gasoline (G) and diesel (D) ranges (volatile and extractible, respectively) are to be analyzed and characterized by GCFID with a fused capillary column and prepared by EPA method 5030 (purge and trap) for volatile hydrocarbons, or extracted by sonication using 3550 methodology for extractable hydrocarbons. Fused capillary columns are preferred to packed columns; a packed column may be used as a "first cut" with "dirty" samples or once the hydrocarbons have been characterized and proper QA/QC is followed.
6. TETRAETHYL LEAD (TEL) analysis may be required if total lead is detected unless the determination is made that the total lead concentration is geogenic (naturally occurring).
7. CHLORINATED HYDROCARBONS (CL HC) AND BENZENE, TOLUENE, XYLENE AND ETHYLBENZENE (BTX&E) are analyzed in soil by EPA methods 8010 and 8020 respectively, (or 8240) and in water, 601 and 602, respectively (or 624).
8. OIL AND GREASE (O & G) may be used when heavy, straight chain hydrocarbons may be present. Infrared analysis by method 418.1 may also be acceptable for O & G if proper standards are used. Standard Methods" 17th Edition, 1989, has changed the 503 series to 5520.
9. PRACTICAL QUANTITATION REPORTING LIMITS are influenced by matrix problems and laboratory QA/QC procedures. Following are the Practical Quantitation Reporting Limits:

	<u>SOIL PPM</u>	<u>WATER PPB</u>
TPH G	1.0	50.0
TPH D	1.0	50.0
BTX&E	0.005	0.5
O & G	50.0	5,000.0

Based upon a Regional Board survey of Department of Health Services Certified Laboratories, the Practical Quantitation Reporting Limits are attainable by a majority of laboratories with the exception of diesel fuel in soils. The Diesel Practical Quantitation Reporting Limits, shown by the survey, are:

ROUTINE	MODIFIED PROTOCOL
≤ 10 ppm (42%)	≤ 10 ppm (10%)
≤ 5 ppm (19%)	≤ 5 ppm (21%)
≤ 1 ppm (35%)	≤ 1 ppm (60%)

When the Practical Quantitation Reporting Limits are not achievable, an explanation of the problem is to be submitted on the laboratory data sheets.

- LABORATORY DATA SHEETS are to be signed and submitted and include the laboratory's assessment of the condition of the samples on receipt including temperature, suitable container type, air bubbles present/absent in VOA bottles, proper preservation, etc. The sheets are to include the dates sampled, submitted, prepared for analysis, and analyzed.
- IF PEAKS ARE FOUND, when running samples, that do not conform to the standard, laboratories are to report the peaks, including any unknown complex mixtures that elute at times varying from the standards. Recognizing that these mixtures may be contrary to the standard, they may not be readily identified; however, they are to be reported. At the discretion of the LIA or Regional Board the following information is to be contained in the laboratory report:

The relative retention time for the unknown peak(s) relative to the reference peak in the standard, copies of the chromatogram(s), the type of column used, initial temperature, temperature program is C/minute, and the final temperature.

- REPORTING LIMITS FOR TPH are: gasoline standard ≤ 20 carbon atoms, diesel and jet fuel (kerosene) standard ≤ 50 carbon atoms. It is not necessary to continue the chromatography beyond the limit, standard, or EPA/DHS method protocol (whichever time is greater).

#### EPILOGUE

ADDITIVES: Major oil companies are being encouraged or required by the federal government to reformulate gasoline as cleaner burning fuels to reduce air emissions. MTBE (Methyl-tertiary butyl ether), ETHANOL (ethyl alcohol), and other chemicals may be added to reformulate gasolines to increase the oxygen content in the fuel and thereby decrease undesirable emissions (about four percent with MTBE). MTBE and ethanol are, for practical purposes, soluble in water. The removal from the water column will be difficult. Other compounds are being added by the oil companies for various purposes. The refinements for detection and analysis for all of these additives are still being worked out. If you have any questions about the methodology, please call your Regional Board representative.



LAW OFFICES OF  
ALAN C. WALTNER  
1786 FRANKLIN STREET, EIGHTH FLOOR  
OAKLAND, CALIFORNIA 94612

TELEPHONE  
(510) 465-4494

FACSIMILE  
(510) 465-6248

September 16, 1992

Livermore Arcade Responsible Parties:  
(See attached list)

RE: Livermore Arcade Shopping Center Groundwater Cleanup -  
Supplemental Notification of Responsibility for Cleanup  
Costs and Demand

Ladies and Gentlemen:

I represent the Grubb & Ellis Realty Income Trust,  
Liquidating Trust ("Grubb & Ellis") in negotiations and/or  
litigation to recover contaminated site cleanup costs presently  
being incurred at the Livermore Arcade Shopping Center  
("Arcade").

This letter supplements a notice and demand letter sent on  
January 31, 1992 to certain of the listed recipients regarding  
liability and payment for cleanup of the Arcade site (the  
"January notice"). As discussed in the January notice, cleanup  
is necessary to address a plume of groundwater contaminated with  
tetrachloroethylene ("PCE") originating from Mike's One-Hour Dry  
Cleaners ("Mike's" or "Mike's Cleaners") in the Arcade. The  
plume was defined in 1990 to be approximately 900 feet in  
length, presently appears to be stable due to lowered groundwater  
conditions, but threatens to migrate and recontaminate shallow  
groundwater above a significant drinking water supply.

This supplemental notice and demand is being sent to respond  
to information provided by the recipients of the January notice,  
as well as information developed during the remedial  
investigation and feasibility study recently completed for the  
site. Remedial Investigation Report, Livermore Arcade Shopping  
Center, H+GCL, April 1992 ("RI"); Draft Feasibility Study,  
Remedial Action Plan, Livermore Arcade Shopping Center, PCE  
Groundwater Cleanup, H+GCL, July 9, 1992 ("FS"). That new  
information includes the following:

- o The former operators of the facility, Michael Neely and  
Perry Neely, have identified an additional operator,

Gary Neely, that was not previously notified.

- o Counsel for the Neelys, by letter dated August 5, 1992, has reported that a significant spill of perchloroethylene occurred during a several month period beginning in May, 1982, when a dry cleaning machine supplied by Multimatic, Inc., a manufacturer of dry cleaning equipment located in North Vale, New Jersey, through its distributor, Western States Design, leaked dry cleaning solvent. Counsel for the Neelys reports that the leak, which was first inferred due to excessive usage of PCE and was not immediately obvious, was traced to a three-quarter inch crack on the bottom of the machine. This defective equipment therefore resulted in a significant portion of the release through a sudden and accidental occurrence.
- o Counsel for the Neelys also reported that from 1982, until 1985, spent dry cleaning solvent was disposed to both the trash dumpster and the floor drain. After that date, counsel for the Neelys reports that all spent solvent was transported off site to a southern California recycler.
- o Counsel for the Neelys has alleged that the current operator of the facility, Steve Song, has manifested less spent solvent for offsite treatment or disposal than the estimated usage levels for this facility. As a result, the Neelys allege that the current operator has potentially disposed of spent PCE to the sanitary sewer, contributing to the release. Grubb & Ellis does not believe, however, that such disposal has occurred, and this statement is made solely at the request of these other parties.
- o Video inspection of the sewer line indicates that it was defectively installed. The line is disjointed where two dissimilar types of pipe are connected, at the identified location of the release.
- o A plume of hydrocarbons from an offsite gasoline source previously identified at the site has been discovered to overlap with the PCE plume, and is impacting the PCE cleanup. The highest risk levels identified in a risk assessment performed for the site result from the presence of these hydrocarbons, specifically benzene.
- o An additional plume of PCE was identified at the adjacent Millers' Outpost Center, emanating from Paul's Cleaners. This plume overlaps with the plume from

Mike's Cleaners, but at lower concentrations.

- o The Executive Officer of the Regional Water Quality Control Board, by letter dated August 6, 1992, has requested an active cleanup in an area larger than the 100 part per billion PCE contour as recommended by Grubb & Ellis in the FS. Preliminary analysis in response to this request indicates that the increase in costs necessary to respond to this request may not be substantial. This is due primarily to the fact that the SVE system is producing a larger cleanup zone at the test location than previously anticipated, so that a larger area is likely to be addressed through each well. The estimates presented below are preliminarily designed to respond to the Regional Board's request.
- o The cleanup area will need to extend beyond the boundaries of the Livermore Arcade, and will require site access to parcels not presently controlled by Grubb & Ellis.
- o A pilot test of a soil vapor extraction system at the site is producing good cleanup results. These results are being integrated into a modified cleanup plan responding to the Regional Board's letter. Previously, site cleanup costs were anticipated to be approximately \$602,500, not including the expense of any cost recovery litigation or costs of operation, maintenance and sampling beyond the first year. This cost estimate has now been revised to a total of \$843,980, including all presently proposed monitoring and operations costs. With additional adverse assumptions and contingencies, including cost recovery litigation, as discussed below, the total increases to \$1,437,980.

This new information has three principal effects, creating new areas of liability, against additional responsible parties, for an increased amount.

The new areas of liability are as follows:

- o Since the initial discharge of PCE occurred through a sudden and accidental event, counsel for the Neelys reports that liability insurers for the Neelys are obligated to pay for cleanup costs charged to the Neelys, or to undertake or pay for cleanup activities required of the Neelys.
- o The defective dry cleaning equipment and defective sewer pipe installation resulted in damage to the

groundwater and to the property requiring cleanup expenditures; these damages create products liability under warranty, negligence and strict liability approaches.

- o The hydrocarbon release includes benzene, a chemical identified the State of California as a chemical known to cause cancer that is found in a potential drinking water source at levels above that permitted under Proposition 65.
- o The migration of the gasoline plume onto the Livermore Arcade site constitutes a trespass, public nuisance, private nuisance, and negligence, for which foreseeable damages may be awarded.

Second, the parties responsible for undertaking or paying for cleanup include additional individuals and corporations, both under the previously identified liability approaches, as well as the newly identified liability approaches. The newly identified parties include, principally, the supplier of the defective dry cleaning equipment that led to the significant release in 1982, and the owner of the source of petroleum contamination under the site, considered to be the nearby Beacon Oil Station.

Third, the cleanup approach and cleanup costs have now been updated, with a current cleanup estimate of \$843,980. Of this, \$9,500 represents additional investigation costs, including the cost of the soil vapor extraction and air sparging pilot tests currently underway at the site, \$165,980 represents increases in the assumed costs of cleanup, including costs for a second soil vapor extraction system and costs beyond the first year of operations (which had not yet been quantified as of the date of the initial demand letter) \$16,000 reflects increased costs of legal review and negotiations, and \$50,000 represents increased cleanup costs resulting from the presence of the gasoline contamination at the site.

Additional contingencies, including installation of a deep well as requested by the Regional Water Quality Control Board, other costs necessary to respond to Regional Board requests, installation of additional monitoring wells, increased costs in the event that air sparging and natural degradation are not as effective as estimated, cost recovery litigation expenses, and other miscellaneous contingencies, produce a more adverse estimate of \$1,423,798 in total costs.

This demand letter first identifies and briefly describes the liable parties. It then discusses those other interested agencies and parties that will need to review, assist, consent

to, or otherwise participate in the cleanup. It next summarizes each of the liability approaches and states the liable parties to which each approach applies.

As stated previously, if the matter does not settle, an action will be filed in federal district court and/or state superior court sixty days after the issuance of this supplemental notice and demand letter.

#### **I. LIABLE PARTIES**

The following is a summary of the presently identified liable parties:

**Michael, Perry, and Gary Neely ("the Neelys").** These individuals were the owners and operators of Mike's One Hour Cleaners during the period of the release. The Neelys operated Mike's One Hour Dry Cleaners from late 1981 to 1987.

**Catellus Development Corporation ("Catellus").** This Delaware Corporation is the successor to Southern Pacific Land Company, which owned the property from February through December, 1982, during which Mike's One Hour Dry Cleaners was first being operated by the Neelys, and during the period of the spill from the Multimatic machine. Catellus' predecessor, Southern Pacific, also developed the Livermore Arcade and is presumed to have overseen the installation of the leaking sewer pipe as a part of that development.

**Stark Investment Company ("Stark").** This California General Partnership, owned the property from December 1982<sup>1</sup> to December 30, 1988. Also included and hereby notified are the general partners of Stark Investment Company, including Chuck Kline, Fortney Pete Stark, and Jeff Stark.

**Steven Song ("Song").** This individual has operated Mike's Cleaners from 1987 to the present, which includes all of the period that the Arcade has been owned by Grubb & Ellis.

**Multimatic, Inc., a New Jersey Corporation ("Multimatic"), and its distributor, Western State Design, a California Corporation ("Western").** These companies supplied the leaking dry cleaning equipment and failed to promptly identify and repair the source of the leak when requested to do so by the Neelys.

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<sup>1</sup>The deed was executed November 24, 1982.

**Unidentified sewer pipe installer.** This individual or company defectively installed the sewer pipe at the point of the release.

**Liability insurers.** These liability insurers provided coverage to the Neelys and Catellus during the period when the sudden and accidental release occurred. Liability insurers for Stark may also be liable for cleanup costs resulting from releases during Stark's ownership. The Neelys were insured by Fireman's Fund from 1983 to 1986, and before that were insured by Kempers from 1982-1983. Each policy's limit was \$1 million.<sup>2</sup>

**Beacon Oil Station.** This gasoline station owned by Ultramar, Inc., a California Corporation, has been identified by Alameda County as the probable source of hydrocarbons that are presently migrating under the Arcade site.

**Paul's Sparkle Cleaners.** This dry cleaning establishment located in the adjacent Millers Outpost Center has been identified as the apparent source of a second PCE plume that is located in a portion of the plume from Mike's Cleaners.

**TransWorld Consortium, Inc.** This company performed an environmental evaluation that served as the basis for Grubb & Ellis' purchase of the property. That environmental evaluation did not identify the contamination at the site.

## II. OTHER AFFECTED PARTIES

A number of other parties will need to be involved in the cleanup activities due to their ownership or control of facilities that will be involved in the cleanup, or in monitoring activities. These include the following:

**Millers Outpost.** Since a portion of the cleanup may need to take place on this property, the continuing cooperation of the Millers Outpost Center will be required, particularly for site access.

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<sup>2</sup>We are informed that the details of these policies are as follows: From April 3, 1982 through May 3, 1983, the operator was covered by Lumberman's Mutual Casualty Co, a member of The Kemper Group, 1 Kemper Drive, Long Grove, Ill. 60049, policy 255-0520493, account 382-015, claim 155 LU 043572N. From May 3, 1983, to July 3, 1986, the operator was covered by Fireman's Fund, 1330 B Redwood Way, Petaluma, CA 94954, several policies were applicable, and their claim number is H10592106580.

**City of Livermore.** Some of the extraction wells may need to be located in public rights of way controlled by the City of Livermore, and cooperation of the City of Livermore may be needed in order to implement site cleanup.

**California Water Service.** The feasibility study proposes continued monitoring of the California Water Service wells in the vicinity of the site, and the continuing cooperation of CWS will be necessary to continue this monitoring.

These parties are not presently identified as being financially responsible for cleanup costs.

### **III. OVERSIGHT AGENCIES**

Several agencies have oversight responsibility for the cleanup activities, including the following:

**California Regional Water Quality Control Board.** This agency has assisted with review and comment on Grubb & Ellis' site investigation and remedial planning. Continued cooperation from that agency will assist in the cleanup of the site.

**Alameda County Health Department.** It has been reported to Grubb & Ellis that this agency is investigating the hydrocarbon spill from the Beacon site and will be the lead agency for directing any cleanup activities.

**Bay Area Air Quality Management District.** This agency is responsible for air quality permitting for the proposed cleanup.

**Attorney General of the State of California, Alameda County District Attorney, Livermore City Attorney.** Each of these agencies has authority to pursue the Proposition 65 causes of action discussed below, and notice is being provided to these agencies as provided by Proposition 65.

**United States Environmental Protection Agency, Attorney General of the United States, Department of Toxic Substances Control.** These agencies are being notified of the Resource Conservation and Recovery Act claims for their information and potential enforcement.

#### IV. LIABILITY APPROACHES

##### A. Comprehensive Environmental Response, Compensation and Liability Act

Under federal law, any person who owned or operated a facility at the time of disposal of any hazardous substance is a "responsible party" liable for contaminated site cleanup costs. 42 U.S.C. § 9607(a)(2). Responsible parties are all jointly, severally and strictly liable for cleanup costs. Joint and several liability means that any of the responsible parties could be assessed the entire cost of cleanup if the matter proceeds to court. The costs that may be recovered from a responsible party include all "necessary costs of response incurred by any other person consistent with the national contingency plan . . . ." 42 U.S.C. § 9607(a)(4). These costs include testing, monitoring, administrative and other costs in addition to costs of the direct physical cleanup.

Under CERCLA, liability is joint and several, as stated in Mardan Corp. v. C.G.C. Music, Ltd., 804 F.2d 1454, 57, n.3 (9th Cir. 1986):

Most district courts that have faced the issue have interpreted section 107 of CERCLA to impose, as a matter of federal law, joint and several liability for indivisible injuries with a correlative right of contribution. [citations omitted]. The commentators have also concluded that a federal right of contribution attends CERCLA. CERCLA Section 113(f)(1) provides that "[i]n resolving contribution claims, the court may allocate response costs among liable parties using such equitable factors as the court determines are appropriate."

That is, each of the CERCLA responsible parties potentially is liable for the full cost of cleanup but each may have a claim against the others for an equitable share of costs.

The Neelys, Multimatic, Western and (as alleged by the Neelys) Song are responsible parties as operators of the facility, and Catellus and Stark are responsible parties as owners of the facility at the time of the release of PCE. As discussed below, their insurers may be liable for payment of cleanup costs arising from this responsible party status.

##### B. Resource Conservation and Recovery Act

The federal Resource Conservation and Recovery Act authorizes citizen suits by any person against any person "who has contributed or who is contributing to the past or present



handling, storage, treatment, transportation, or disposal of any solid or hazardous waste which may present an imminent and substantial endangerment to health or the environment." 42 U.S.C. § 6972(a)(1)(B). In addition to the recovery of cleanup costs and a declaration of cleanup liability, this provision permits the Court to grant injunctive relief ordering site remediation.

The Neelys, Multimatic, Western, the unknown pipe installer, Catellus (as developer of the site during the pipe installation), and (again as alleged by the Neelys) Song, are all persons who have contributed to disposal of a hazardous waste which may present an endangerment within the meaning of this provision.

### C. Proposition 65

Proposition 65, the Safe Drinking Water and Toxic Enforcement Act of 1986, California Health and Safety Code § 25249.5 et seq., makes it unlawful, and provides for citizen enforcement, of the following actions:

- o Failure to give clear and reasonable warning(s) prior to knowingly and intentionally exposing individuals to a chemical known to the State of California to cause cancer or reproductive toxicity in violation of § 25249.6. The individuals so exposed without clear and reasonable warning include employees, residents, customers, ultimate consumers, commuters, students, neighbors, visitors and others.
- o Knowingly discharging or releasing a chemical known to the State of California to cause cancer or reproductive toxicity into water or into or onto land where such chemical passes or will probably pass into a source of drinking water in violation of § 25249.5.

The chemical(s) known to the State of California to cause cancer or reproductive toxicity include benzene, CAS No. 71432, listed February 27, 1987. 22 California Code of Regulations § 12000.

Beacon is currently in violation of these provisions, having discharged benzene to the shallow aquifer, with trace levels of toluene having been discovered in the deeper aquifer; this exposure was also made without a clear and reasonable warning to those individuals exposed.

Under Proposition 65, Grubb & Ellis is authorized to bring suit sixty days hereafter to correct these violations, pursuant to Health and Safety Code § 25249.7(d).

By this letter, Grubb & Ellis gives prior notice to the violator, the Attorney General of the State of California, the District Attorney for the County of Alameda, and the City Attorney for the City of Livermore of its intention to commence an action to correct this violation. We would appreciate receiving from these public enforcement agencies prompt notification of their decision to pursue action under § 25149.7(c), or to decline to do so, so that we may make our decisions under § 25249.7(d) accordingly.

#### **D. Insurer's Liability**

Many of the financial obligations arising from the claims identified above may be covered by one or more insurance policies. Specifically, a 1990 decision of the California Supreme Court held that comprehensive general liability ("CGL") policies, which provided coverage for all sums that an insured became legally obligated to pay as "damages" or "ultimate net loss" because of property damage, covered costs of reimbursing government agencies and complying with injunctions ordering cleanup under the Comprehensive Environmental Response Compensation and Liability Act and similar statutes. AIU Insurance Company v. FMC Corporation, 51 Cal.3d 807 (1990). Here, the insurers for the Neelys and Catellus, and possibly Stark and others, are responsible for payment of cleanup costs and other damages arising from the PCE and hydrocarbon spills.

#### **E. Products Liability**

Two defective products, the dry cleaning machine and the sewer pipe, proximately caused at least a portion of the release and ultimate damage to groundwater resources at the site. Defective products may also be identified in connection with the Beacon hydrocarbon spill. Multimatic, Western, the unknown pipe installer, and their insurers, are liable for damages resulting from these defective products by way of warranty, negligence, and strict liability. Catellus is liable for negligent construction management in connection with the installation of the sewer pipe, and may have warranty obligations or strict liability for that faulty installation.

#### **F. Tortious Release of Gasoline into the Groundwater**

The release of hydrocarbons from underground facilities at the Beacon station, and the subsequent migration of those hydrocarbons, including benzene, to the subsurface below the Livermore Arcade, constitute a trespass, public nuisance, private nuisance and negligent release, and Beacon is liable for all damages proximately caused thereby. Demand is made that Beacon immediately abate and remediate that release, and further that

Beacon compensate Grubb & Ellis for its costs of investigation and cleanup of the hydrocarbon release. In any action Grubb & Ellis will also claim the diminution of the property value of the Livermore Arcade resulting from the release of hydrocarbons.

#### **G. Unfair Business Practices**

By committing the acts described above, the Neelys, the unknown pipe installer, Catellus, Multimatic, Western, Stark and Beacon have and are engaging in unlawful business practices which constitute unfair competition within the meaning of California Business and Professions Code Section 17200. Such actions may be enjoined, and other appropriate remedies ordered, pursuant to Cal. Business and Professions Code Section 17203.

#### **H. TransWorld Consortium's Evaluation of the Site**

In connection with the purchase of the property by Grubb & Ellis in 1989, an initial environmental survey was prepared by TransWorld Consortium, Inc, Architects & Engineers. That survey did not identify the contamination at the site, but instead concluded "[a]lthough it is difficult to provide an absolute guarantee of the 'nonexistence' of pollution at the site, we are confident that there is very little possibility of a serious environmental liability associated with this project site." Livermore Arcade Shopping Center, Initial Environmental Survey, dated January 4, 1989 ("Phase I").

Grubb & Ellis considers the Phase I to have reflected "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice in an effort to minimize liability" sufficient to support a third party defense to liability under 42 U.S.C. Section 9601(35). However, in the event that the Phase I is found to be inadequate to meet this standard, TransWorld Consortium may be liable for professional negligence in connection with preparation of the Phase I.

#### **I. Failure to Disclose Contamination/ Warranties and Representations; Indemnification by Stark.**

In connection with the sale of the property to Grubb & Ellis in 1988-1989, Stark, the seller represented and warranted that:

(iv) To the best of Owner's knowledge, the Property is not in violation of any federal, state, municipal or other law, ordinance or regulation relating to the environmental conditions on, under or about the Property, including, but not limited to, soil and groundwater conditions; and during the time in which Owner owned the Property and, to the best

of Owner's knowledge, during any prior time, neither Owner nor, to the best of Owner's knowledge, any third party, used, generated, stored (other than as disclosed in that certain letter from Sears to Owner dated January 20, 1988 a copy of which has been delivered to Optionee) or disposed of on, under or about the Property or transported to or from the Property any hazardous waste, toxic substances or related materials or any friable asbestos or any substance containing asbestos ("Hazardous Materials").

Option Agreement entered into as of April 11, 1988, at p. 7. If Stark knew of the contamination, this representation and warranty would have been violated.

Furthermore, in assigning the existing leases, including the lease for Mike's Cleaners, Stark agreed as follows:

Assignor shall indemnify, defend by counsel acceptable to Assignee, and hold Assignee harmless from and against all obligations, liabilities, or claims asserted against Assignee with respect to the Leases, Contracts, Warranties and Guaranties and arising from events which occurred prior to the date of this Assignment and the transfer of title to the Property to Assignee.

Assignment of Leases, Service Contracts, Warranties and Guaranties, dated as of January 3, 1989. Any liability of Grubb & Ellis for the cleanup costs arising from events (such as the release of PCE due to activities of the tenant) occurring before the assignment of leases will be indemnified by Stark under this provision.

#### **V. SUMMARY OF COSTS INCURRED**

Cleanup costs incurred to date include the costs of hydrogeologic testing, agency negotiations, aquifer modelling, access negotiations, groundwater sampling and analysis, preparation of reports regarding the preliminary assessment, site inspection, remedial investigation and feasibility study phases, and performance of the pilot test program for soil vapor extraction and air sparging. Future costs include costs that will be incurred in connection with final remedial design, capital costs of the treatment system, costs of a deep monitoring well, operation and maintenance, monitoring, attorney and consultant fees. The costs are anticipated to include the following:

**Anticipated Costs:**

Site Investigation and Analysis, Remedial design, pilot test program, permitting:	\$344,000
Costs of treatment system, including two soil vapor extraction systems and including all operation and maintenance expenses and monitoring:	\$379,980
Project management:	\$60,000
Legal review and negotiations:	\$60,000
Subtotal:	<u>\$843,980</u>

This sum reflects Grubb & Ellis' present best estimate of the costs of cleanup. Of these costs, approximately \$571,000 have already been incurred. Demand is therefore made of each and every responsible party under CERCLA, and each and every contributing party under RCRA, to pay immediately the sums already expended and to agree to pay those future expenses identified above that may be incurred in the future.<sup>3</sup>

Certain of the responsible parties have requested an estimate of cleanup costs that includes additional adverse assumptions and contingencies. Due to a number of unpredictable factors, including the actual performance of the cleanup system, the costs of the system, potential discovery of additional contamination, and regulatory requirements, no assurance of the ultimate cost of cleanup can be provided, and these figures therefore cannot be considered a worst case or not to exceed

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<sup>3</sup>In making this demand, Grubb & Ellis wishes to bring to the attention of these identified parties the recent decision in Zands v. Nelson, 1992 U.S. Dist. LEXIS 9264, 92 Daily Journal DAR 9197 (S.D.CA., June 25, 1992). This decision addressed a RCRA endangerment claim in a successive ownership situation much like that faced here. That case held that the current owner need only show that the discharge occurred before he or she owned the property and that the possible joint responsible parties have been named. The burden then shifts to the owners and operators during that period to demonstrate the specific proportioning of liability. While the case arose outside of the Superfund context, it provides an appropriate basis for approaching both the RCRA and CERCLA facets of this claim. It is derived from tort law theories that would apply directly to the products liability and tort approaches identified above as well.

value. However, the following contingency costs have been quantified in response to the request of the responsible parties for a more pessimistic estimate:

**Contingencies:**

Completion and sampling of a deep monitoring well in the lower drinking water aquifer, as requested by the RWQCB <sup>4</sup> :	\$30,000
Responding to additional requests by Regional Water Quality Control Board:	\$15,000
Completion of four additional monitoring wells placed at the down gradient boundary of the PCE plume in order to monitor PCE groundwater concentrations when the groundwater table is low:	\$25,000
Poor results of pilot study increasing the time needed to achieve clean-up levels:	\$24,000
Slow or non-detectable rates of natural degradation requiring expansion of the proposed area of clean-up:	\$200,000
Attorneys, expert witness and other costs of cost recovery and enforcement litigation:	\$200,000
Miscellaneous contingencies:	\$100,000
Total with contingencies:	<hr/> \$1,437,980

These additional costs are therefore included in this demand.

Demand is also made of Beacon to abate and remediate the hydrocarbon release, and to pay Grubb & Ellis such sums as may have resulted from the diminution in property value of the Livermore Arcade that has resulted from the hydrocarbon release.

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<sup>4</sup>If deep aquifer PCE contamination is discovered, costs would dramatically increase.

Livermore Arcade Cleanup Responsible Parties  
September 16, 1992  
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Under Proposition 65, violator Beacon is further liable for civil penalties as provided therein.

#### VI. INFORMATION REQUEST

In order to develop a more thorough basis for settlement discussions and/or litigation apportioning cleanup costs, we request that the Neelys and Song provide complete purchase and disposal records for PCE, to establish a mass balance calculation supporting the potential discharge levels during their respective periods of operation. While records were previously provided by Song indicating that all PCE has been properly treated offsite, certain responsible parties have questioned the completeness of these records.

#### VII. CONCLUSION

As described in this letter, the identified parties are requested to pay for or undertake the cleanup at the site, and to otherwise abate the contamination that has occurred as a result of their activities.

Sincerely,



Alan Waltner

Distribution: See attached list

Livermore Arcade Cleanup Responsible Parties  
September 16, 1992  
Page 16

Addressees:

**LIABLE PARTIES:**

**Former operators of Mike's Cleaners, their insurers and attorneys:**

Perry J. Neely (via registered mail, return receipt requested)  
2426 149th Ct, SE  
Mill Creek, WA 98012

Michael Neely  
c/o Perry J. Neely  
2426 149th Ct, SE  
Mill Creek, WA 98012

Gary Neely  
c/o Perry J. Neely  
2426 149th Ct, SE  
Mill Creek, WA 98012

Christine K. Noma  
Wendel, Rosen, Black, Dean & Levitan  
Twentieth Floor Clorox Building  
1221 Broadway  
Oakland, CA 94612

Robert Koscielniak  
The Kemper Group  
1 Kemper Drive  
Long Grove, Ill. 60049

Linda Tatka  
Fireman's Fund  
Environmental Claims Facility  
1330 B Redwood Way  
Petaluma, CA 94954

**Owner during 1982, and its attorneys:**

Catellus Development Corporation  
Attn: Mr. Ric Notini  
(via registered mail, return receipt requested)  
201 Mission Street, 30th Floor  
San Francisco, CA 94105

Catellus Development Corporation  
c/o CT Corporation System  
818 W Seventh Street  
Los Angeles, CA 90017



Livermore Arcade Cleanup Responsible Parties  
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Maureen Sullivan, Esq.  
Catellus Development Corporation  
201 Mission Street, 30th Fl.  
San Francisco, CA 94105

Peter Turner  
Landels, Ripley & Diamond  
350 Stuart Street  
San Francisco, CA 94105-1250

**Owner from 1982 through 1987, and its attorneys:**

Stark Investment Company  
22320 Foothill Blvd., Suite 500  
Hayward, CA 94541  
Attn: Congressman Pete Stark

Brian Sandoval  
Robison, Belaustegvi, Robb & Sharp  
71 Washington Street  
Reno, NV 89503

**Dry cleaning equipment supplier:**

Multimatic Corporation  
(via registered mail, return receipt requested)  
General Counsel  
Legal Department  
162 Veterans Drive  
Northvale, NJ 07647

Western State Design  
(via registered mail, return receipt requested)  
PO Box 57106  
Hayward, CA 94545

Western State Design  
c/o Dennis W. Mack  
25616 Nickel Place  
Hayward, CA 94545

**Petroleum source:**

Mr. Terry Fox (re: Beacon Oil Co)  
Ultramar, Inc.  
5225 West 3rd Street  
Hanford, CA 93230

Livermore Arcade Cleanup Responsible Parties  
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**Current operators:**

Steven Song  
Mike's One Hour Cleaners  
1430 First Street  
Livermore, CA 94550

Mr. Chuck Hartz  
Paul's Sparkle Cleaners  
1332 Railroad Avenue  
Livermore, CA 94550

**Site investigator:**

TransWorld Consortium, Inc.  
123 Townsend Street, Suite 610  
San Francisco, CA 94107

**INTERESTED PARTIES:**

Mr. Kirk Bennett  
IMA Financial Corporation (re: Miller's Outpost)  
260 California Street, Suite 700  
San Francisco, CA 94111

City of Livermore  
Public Works Office  
City Hall  
1052 S. Livermore Avenue  
Livermore, CA 94550

California Water Service  
P.O. Box 1150  
San Jose, CA 95108

**OVERSIGHT AGENCIES:**

William Reilly, Administrator  
United States Environmental Protection Agency  
Mail Code A-100  
401 M Street, S.W.  
Washington, D.C. 20460

The Honorable William Barr  
Attorney General of the United States  
10th Street and Constitution Ave., N.W.  
Washington, D.C. 20530

Livermore Arcade Cleanup Responsible Parties  
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National Response Center  
Duty Officer  
Headquarters, United States Coast Guard  
2100 2d Street SW  
Washington, D.C. 20593

Daniel Lundgren  
Attorney General  
State of California  
1515 K Street  
Sacramento, CA 95814

William F. Soo Hoo, Director  
Department of Toxic Substances Control  
PO Box 806  
Sacramento, CA 95812-0806

Lester Feldman  
Regional Water Quality Control Board  
1800 Harrison, Suite 700  
Oakland, CA 94621

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

Eva Chu  
Alameda County Health Department  
Dept. of Environmental Health  
80 Swan Way, Suite 200  
Oakland, CA 94621

John W. Meehan  
District Attorney  
Alameda County  
1225 Fallon Street, Ninth Floor  
Oakland, CA 94612

Gil Jensen, Deputy District Attorney  
Alameda County  
7677 Oakport Street, Suite 400  
Oakland, CA 94621

Thomas Curry  
Livermore City Attorney  
City Hall  
1052 S. Livermore Avenue  
Livermore, CA 94550

SITE HEALTH & SAFETY PLAN

EMERGENCY CONTACT LISTING

	Emergency Number	Alternate Number
Beacon Station #604 - Livermore:		
Fire/Ambulance . . . . .	911 . . . . .	_____
Police . . . . .	911 . . . . .	_____

Hospital Information:

Name VALLEY MEMORIAL HOSR. . . . . . 510-447-7000  
 Street 1111 E. STANLEY BLVD.  
 City LIVERMORE  
 State & Zip CA 94550

Directions:

NORTH ON FIRST ST. TO STANLEY BLVD.  
 LEFT (WEST) ON STANLEY TO  
 1111 E. STANLEY.

Additional Contingency Telephone Numbers:

Walton Engineering, Inc. Headquarter Offices . . . (916) 372-1888  
 Delta Environmental Consultants Offices . . . . . (916) 638-2085

**STATE  
COMPENSATION  
INSURANCE  
FUND**

P.O. BOX 807, SAN FRANCISCO, CA 94101-0807

**CERTIFICATE OF WORKERS' COMPENSATION INSURANCE**

OCTOBER 23, 1992

92 007 80 11 2:57  
POLICY NUMBER: 272-92 UNIT 0000317  
CERTIFICATE EXPIRES: 10-1-93


┌  
COUNTY OF ALAMEDA-DEPT. OF ENVIRONMENTAL HEALTH  
HEALTH CARE SERVICES  
HAZARDOUS MATERIALS DIVISION  
80 SWAN WAY, ROOM 200 OAKLAND, CA 94621      JOB: FACILITY #6113  
LIVERMORE, CA

└  
This is to certify that we have issued a valid Workers' Compensation insurance policy in a form approved by the California Insurance Commissioner to the employer named below for the policy period indicated.

This policy is not subject to cancellation by the Fund except upon ten days' advance written notice to the employer.

We will also give you TEN days' advance notice should this policy be cancelled prior to its normal expiration.

This certificate of insurance is not an insurance policy and does not amend, extend or alter the coverage afforded by the policies listed herein. Notwithstanding any requirement, term, or condition of any contract or other document with respect to which this certificate of insurance may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

  
PRESIDENT

EMPLOYER

┌  
MARK D. WILKEY & DENISE C. WILKEY  
DBA: WILKEY'S ENGINEERING  
3143 CATLETT ROAD  
PLEASANT GROVE CA 95668

**SITE HEALTH AND SAFETY PLAN**

**TANK REMOVAL AND REPLACEMENT PROJECT**

**1619 FIRST STREET  
LIVERMORE, CALIFORNIA 94550**

**23, OCTOBER 1992**

**PREPARED BY: WALTON ENGINEERING, INC.**

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## 1.0 INTRODUCTION

### A. OVERVIEW

This Project Health & Safety Plan delineates the basic safety requirements for the Underground Fuels Storage Tank removal/replacement project at the Beacon Gasoline Station #604, located at 1619 First Street, in Livermore, California.

The project will include the removal of three (3) underground fuels storage tanks, and the installation of three (3) new tanks. During the tank removal project, soils from beneath the tanks will be sampled for possible contamination. The soil samples will be collected and analyzed for the possible presence of migrating contaminants, including: TFHC (Total Fuel Hydrocarbons) and BTX Compounds (Benzene, Toluene, and Xylenes).

At the beginning of the project, ambient air samples (background) will be taken with a Gastech LEL meter, set for reading ppm range, to determine the presence or absence of contamination. As the project continues during the day, the personnel on site shall draw periodic air samples to determine the possibility of increases in airborne contamination.

The provisions set forth in this plan will apply as minimum rules to be followed by the employees of Walton Engineering, Inc., Delta Environmental Consultants and their subcontractors working on this phase of the project. The subcontractors may elect to modify these provisions, but only to upgrade or increase the safety requirements, and only with the concurrence of Walton Engineering, Inc..



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## 2.0 PROJECT SAFETY AUTHORITY

### A. ON-SITE PROJECT SAFETY

Personnel responsible for the project safety are:

Mark Vendeiro, Project Superintendent  
Walton Engineering, Inc.

Keoni Almeida, Project Safety Officer  
Delta Environmental Consultants

The Project Safety Officer has the authority to suspend work anytime he determines that the provisions of the plan are inadequate to ensure worker safety. The Project Safety Officer shall also inform the Owner's Representative of individuals whose conduct are not consistent with the requirements of the plan. In addition, the Project Superintendent shall be responsible for the following:

- \* Safety Supplies & Equipment Inventory
- \* Medical Surveillance Program/Physical Examinations
- \* Training Programs/Hazard Communication
- \* Accident/Incident Reporting Procedures
- \* Decontamination/Contamination Reduction Procedures

### B. PROJECT SAFETY OFFICER

The Project Safety Officer is responsible for overall safety and loss prevention functions.

Responsibilities include:

- Health surveillance of all project site employees;
- Assuring that safety procedures in effect are in compliance with all appropriate federal, state, and company regulations (following the most stringent of the standards);
- Maintenance of personnel exposure monitoring records;
- Assuring appropriate personal protective equipment is adequate for actual hazards of on-site conditions;
- Assuring appropriate hazard areas are identified and marked;
- Assuring all personnel entering hazard area are in appropriate levels of protection;

### 3.0 JOB HAZARD ANALYSIS

The possible major contaminants to be encountered on the project are Petroleum Hydrocarbons and Volatile Organic Compounds (VOCs).

There is currently no known air concentration data available for VOCs emissions in the direct breathing zone of personnel working around the piezometers or exposed soils.

Inhalation and dermal (absorption) hazards are the major area of concern, regarding the exposure to VOCs. Results of toxicological studies on animal exposure to pure concentrations of the VOCs that have been detected at the site are detailed in "Handbook of Toxic and Hazardous Chemicals", by M. Sittig (1981), and "Dangerous Properties of Industrial Materials", by N. Irving Sax (1984). An additional reference source used for the development of this Site Safety Plan is the "Documentation of the Threshold Limit Values", published by the ACGIH (American Conference of Governmental Industrial Hygienists, Inc.

#### Gasoline

Gasoline has an appearance of a clear, aromatic, volatile liquid, and is a mixture of aliphatic hydrocarbons. The flash point is listed at  $-50^{\circ}\text{F}$ , and has an LEL (Lower Explosive Limit) of approximately 1.3%.

The TLV for gasoline is listed as 300 ppm in air.

#### Diesel Fuel

This material currently has no TLV specifically adopted by NIOSH. However, it has been listed as a suspect carcinogen, and is currently being tested for carcinogenicity.

#### Benzene

Benzene is a common constituent of gasoline and other petroleum product materials. It is a clear, colorless liquid, with a flash point listed at  $12^{\circ}\text{F}$ .

The currently established TLV for Benzene is 10 ppm in air. However, the American Conference of Governmental Hygienists (ACGIH) has recommended a TLV of 1 ppm be adopted.

Toluene

This material is a flammable, colorless liquid, with a benzol-like odor. The flash point is listed at 40°F.

The currently established TLV is 100 ppm in air.

XYLENE

This material is a clear liquid with a flash point of 100°F.

The TLV is currently established at 100 ppm in air, and is currently under study as a possible carcinogen.

It is currently not anticipated that the potential levels of exposure will reach PEL or TLV limits, but this is based solely on limited available specific information. It is planned that inhalation and dermal contact will be the potential exposure pathways of concern. Protective hand coverings, including outer and under gloves will be mandatory for all field operations personnel. In addition, respiratory protective devices shall be required to be available to each person in the Exclusion Zone, or within easy reach of those persons working in the Contamination Reduction Zone, should irritating odors or irritation of respiratory tract become detectable.

The appropriate air-purifying respiratory protective devices, that are required to be available for all personnel working on-site, will be fitted with organic vapor cartridges and dust pre-filters, or with the high efficiency, organic vapor/HEPA stack type cartridge. Typically, if the respiratory protective devices are worn, the cartridge will need to be changed daily.

If air monitoring at the breathing zone of the workers is recorded to be 50 ppm or more (for total organic compounds), the Project Safety Officer will utilize colorimetric tubes (Drager, Sensidyne, etc.) for Benzene specification. Provided no Benzene is detected, the action level for increasing the level of protection from level D to level C (including respiratory protection) will be set at 200 ppm as measured at the breathing zone of workers. If Benzene is detected, at any level, respiratory protection will be required for all workers.

In addition, during the tank removal activities personnel working within the exclusion zone will monitor wind direction and speed, and will operate from the upwind side of the excavation location as much as possible.

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#### 4.0 RISK ASSESSMENT SUMMARY

It is not anticipated that there will be any significant or major potential source of exposures due to the scope of work to be followed on this project. The potential of any increased risk of exposure on other workers or the surrounding community is minimal. The basic potential exposure source would probably originate from airborne dusts, during the excavation activities, and those dusts containing low level concentrations of VOCs materials in the soils.

Due to this potential, the Contractor will have equipment on-site to provide for dust control during these activities, if it appears that dust control is warranted. Also, perimeter air monitoring, to detect potentially migrating contaminants, may be conducted to ensure no hazardous materials are migrating to the surrounding community.

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5.0 EXPOSURE MONITORING PLAN

A. GENERAL

An air quality monitoring program shall be implemented to provide baseline and on-going air quality data for site operations. The program shall include:

1. A preliminary survey of existing air quality conditions, prior to any surface disturbances and, if possible, under anticipated "worst case" weather conditions, to be used to establish baseline levels for input into the respiratory protection selection process;
2. An on-going evaluation of on-site atmospheric contaminant concentrations during site activities that involve significant surface disturbances;
3. Perimeter monitoring of downwind air quality conditions during significant surface disturbances.

The Project Safety Officer will have a direct reading, Gastech Model 1314 on site to assist with these air monitoring functions.

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## 6.0 PERSONAL PROTECTIVE EQUIPMENT

### A. INTRODUCTION

It is important that personal protective equipment and safety requirements be appropriate to protect against the potential hazards at the site. Protective equipment will be selected based on the contaminant type(s), concentration(s), and routes of entry. In situations where the type of materials and possibilities of contact are unknown or the hazards are not clearly identifiable, a more subjective determination must be made of the personal protective equipment.

Field personnel and visitors are required to wear the following clothing and equipment, as a minimum, while on this Project Site:

- \* Hard Hat
- \* Boots

### B. LEVELS OF PROTECTION - GENERAL

Level A: Should be worn when the highest level of respiratory, skin, and eye protection is needed.

Level B: Should be selected when the highest level of respiratory protection is needed, but a lesser level of skin protection is required.

Level C: Should be selected when the types of airborne substances are known, the concentration is measured, and the criteria for using air-purifying respirators are met.

Level D: Should not be worn on any site with respiratory or skin hazards. It is primarily a work uniform providing minimal protection.

C. REQUIRED PROTECTION

It is anticipated that level D work clothing will be worn during the tank removal phase of the project. (Unless any liquids are encountered, then personnel will upgrade to level C, P.E. Tyvek or similar). In addition, however, the personnel working on the project will be required to wear surgical under gloves (latex), and chemical outer gloves. As the project involves the removal of underground storage tanks, and the taking of soil samples, the potential exposure anticipated is with the contact with potentially contaminated soils. Historical information indicates the possibilities of encountering fuels from leaking lines or tanks.

Should the readings with the LEL indicate the presence of contaminated materials near the TLVs of the materials analyzed, or if the colorimetric tubes indicates the presence of Benzene, or if the LEL meter (set in ppm reading range) indicates vapor readings approaching the 75-100 ppm range of total organic compounds, the personnel assigned to the project will upgrade their personal protection with appropriate clothing and respiratory protective equipment. That equipment will include the selection of the proper cartridges for the anticipated exposure.

Walton Engineering, Inc. and Delta Environmental Consultants will provide their employees with appropriate personal protective equipment as required. If respirators are deemed necessary, only NIOSH/MSHA certified respiratory protective equipment will be utilized. Walton Engineering, Inc. subcontractor(s) are responsible to supply the appropriate safety equipment for their own employees.



7.0 WORK ZONES AND SECURITY MEASURES

A. GENERAL

A site must be controlled to reduce the possibility of exposure to any contaminants present and their transport by personnel or equipment from the site.

A control system is required to assure that personnel and equipment working on the hazardous waste site are subjected to appropriate health and safety surveillance.

The possibility of exposure or translocation of contaminants can be reduced or eliminated in a number of ways, including:

- \* Setting up security or physical barriers to exclude unnecessary personnel from the general area
- \* Minimizing the number of personnel and equipment on-site consistent with effective operations
- \* Establishing work zones within the site
- \* Establishing control points to regulate access to work zones
- \* Conducting operations in a manner to reduce the exposure of personnel and equipment
- \* Minimizing the airborne dispersion of contaminants
- \* Implementing the appropriate personnel and equipment decontamination procedures

B. FIELD OPERATIONS WORK AREA

Work areas (zones) will be established based on anticipated contamination. Within these zones prescribed operations will occur utilizing appropriate personal protective equipment. Movement between areas will be controlled at check points. The planned zones are:

1. Exclusion Area (contaminated);
2. Contamination Reduction Area; and,
3. Support Area (non-contaminated).

---

## 8.0 DECONTAMINATION PROCEDURES

### A. INTRODUCTION

As part of the system to prevent or reduce the physical transfer of contaminants by people and/or equipment from on-site, procedures will be instituted for the proper decontamination of anything leaving the Exclusion Area and Contamination Reduction Area. These procedures include the decontamination of personnel, protective equipment, monitoring equipment, clean-up equipment, etc. Unless otherwise demonstrated, everything leaving the Exclusion Area should be considered contaminated and appropriate methods established for decontamination shall be followed. In general, decontamination at the site consists of rinsing of equipment, personnel, etc., with some amounts of water and washing with detergent water solutions.

### B. PROCEDURE

1. Personnel equipment worn into the Exclusion Area will be decontaminated upon leaving the Contamination Reduction Area. All equipment decontaminated will be air dried.
2. The decontamination of equipment, material, and personnel used or working in the Contamination Reduction Area may be somewhat less complex than that used in the Exclusion Area.
3. The spent solution, brushes, sponges, containers, stands, etc., used in the decontamination process must, until shown otherwise, be considered contaminated and must be properly disposed.

---

**9.0 GENERAL SAFE WORK PRACTICES**

The project operations shall be conducted with the following minimum safety requirements employed:

- A. Eating, drinking, chewing gum or tobacco, smoking, or any practice that increases the probability of hand to mouth transfer and ingestion of materials is prohibited in any area where the possibility of contamination exists.
- B. Hands must be thoroughly washed upon leaving a contaminated or suspected contaminated area before eating, drinking, or any other activities transpire.
- C. Thorough washing of the entire body should be accomplished whenever decontamination procedures for outer garments are in effect. The washing should occur as soon as possible after the final wearing of protective garments.
- D. Legible and understandable precautionary labels shall be prominently affixed to containers of raw materials, intermediates, products, mixtures, scrap, waste, debris, and contaminated clothing.
- E. Contaminated protective equipment shall not be removed from the regulated area until it has been cleaned or properly packaged and labeled.
- F. Removal of materials from protective clothing or equipment by blowing, shaking, or any other means which may disperse materials into the air is prohibited.
- G. Personnel on-site must use the "buddy" system when wearing any respiratory protective devices. Communications between members must be maintained at all times. Emergency communications shall be prearranged in case of encountering unexpected situations. Visual contact must be maintained between "pairs" on-site, and each team should remain in close proximity to assist each other if necessary.
- H. Personnel should be cautioned to inform each other of subjective symptoms of chemical exposure such as headache, dizziness, nausea, and irritation of the respiratory tract.

- I. No excessive facial hair which interferes with a satisfactory fit of the facepiece-to-face seal, will be allowed on personnel required to wear respiratory protective equipment.
- J. All respiratory protection selection, use, and maintenance shall meet the requirements of established procedures, recognized consensus standards (AIHA, ANSI, NIOSH), and shall comply with the requirements set forth in 29 CFR 1910.134.
- K. Appropriate work areas for support, contamination reduction, and exclusion will be established.
- L. Walton Engineering, Inc. personnel on-site are to be thoroughly briefed on the anticipated hazards, equipment requirements, safety practices, emergency procedures and communications methods, initially and in daily briefings.
- M. Contact with surface and groundwater shall be minimized.
- N. Boots will be worn on-site at all times.

In addition, the following precautions shall be implemented for all personnel working on the project site:

Gross decontamination and removal of all personal protective equipment shall be performed prior to exiting the facility. Contaminated clothing will be removed and collected in a drum for disposal.

The Project Superintendent will be responsible to take necessary steps to ensure that employees are protected from physical hazards, which could include,

- \* Falling objects such as tools or equipment
- \* Tripping over hoses, pipes, tools, or equipment
- \* Slipping on wet or oily surfaces
- \* Insufficient or faulty protective equipment
- \* Insufficient or faulty operations, equipment, or tools

All personnel shall be required to wash hands and face before eating, drinking, or smoking.

Field operations personnel shall be cautioned to inform each other of non-visual effects of the presence of toxics, such as:

- \* Headaches
- \* Dizziness
- \* Nausea
- \* Blurred Vision
- \* Cramps
- \* Irritation of eyes, skin, or respiratory tract
- \* Changes in complexion or skin discoloration
- \* Changes in apparent motor coordination
- \* Changes in personality or demeanor
- \* Excessive salivation or changes in pupillary response
- \* Changes in speech ability or pattern

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**10.0 STANDARD OPERATING PROCEDURES****RESPIRATORY PROTECTION PROGRAM GUIDELINES**

Respirators will be provided by the Company when such equipment is deemed necessary to protect the health of the employee. The Company shall provide respirators which are applicable and suitable for the purpose intended. The employer shall be responsible for the establishment and maintenance of this respiratory protection program. The Project Safety Officer will approve the selection, purchase, and inspection of the models and types of respiratory protective devices.

A medical evaluation is required prior to wearing any respirator, except where emergency escape respirators are provided. The contract physician shall determine annually if any health or physical conditions exist which would prohibit a worker from being assigned to an area requiring respiratory protection. A record will be retained in the employee's medical file, which will be retained at the medical clinic or doctor's office.

Respirators shall not be worn when conditions prevent a facepiece-to-face seal. Such conditions as facial hair, scars, wrinkles, facial diseases, dentures removal, or other disorders could prevent a proper facepiece-to-face seal. In these cases, corrective action will be taken to ensure a proper seal. Contact lenses shall not be worn when using any respirator.

For the safe use of any respirator, it is essential that the user be properly instructed in its operation and maintenance. Both supervisors and employees shall be so instructed. Employees shall be instructed and trained in the proper selection and use of respirators and their limitations. The employee shall use the provided respirator in accordance with instructions and training received. All training shall be documented with records retained in the employee's training files.

11.0 EMERGENCY PROCEDURES

A. SITE EMERGENCY WARNING SYSTEM

Several warning systems may be utilized depending on the work site conditions or emergency involved:

1. Verbal communications
2. Vehicle horns

Verbal instructions with or without assistance are used to deal with specific incidents.

Horn signals are used to signify an emergency warning.

One long blast is used on-site to signify emergency evacuation of the immediate work area to a predetermined location upwind, where a head count will be taken and further instructions given.

Repeated short blasts are used on-site or from off-site to signify evacuation of all personnel from the site to the hot line where further instructions will be given after a head count is taken.

B. EMERGENCY EQUIPMENT

The following equipment comprises the basic emergency equipment list, of which all or some shall be available at the Project site:

1. Fire extinguishers - dry chemical
2. First aid kits (including chemical burn kit)
3. Combustible gas and oxygen detector analyzers
4. Organic vapor detector tubes for Benzene  
- Drager and/or Sensidyne, or equivalent
5. Appropriate spill clean-up supplies and equipment

C. GENERAL EMERGENCY PROCEDURES

In case of an emergency or hazardous situation, the team member that observes this condition shall immediately sound the alarm.

1. Upon hearing an alarm, all non-emergency communications will cease and the member giving the alarm will proceed to give the Project Safety Officer and the Project Superintendent all pertinent information.

2. Actions to be taken will be dictated by the emergency condition.
3. Power equipment will be shut down and operators will stand by for instruction.
4. Injured personnel will be transported to the Contamination Reduction Line.
5. In case of a fire, explosion, or hazard alarm, personnel will immediately proceed to assigned pre-arranged safe locations.
6. Upon arrival at the safe locations, a complete head count will be given to the Project Safety Officer and the Project Superintendent and personnel will stay at the safe locations until the area is secured.

D. PERSONAL INJURY

If an injury occurs due to an accident or exposure to a hazardous substance, Walton Engineering, Inc. will be notified. The Project Superintendent will be given all appropriate information concerning the nature and cause of the injury so that treatment preparations can be initiated. The injured person will be transported to the Contamination Reduction line where appropriate first aid and treatment can begin. The Project Superintendent will be informed and will investigate the cause of the injury and make any necessary changes in work procedures.

E. AMBIENT MONITORING CONTINGENCIES

When ambient monitoring on the downwind edge of the site indicates significantly higher than background levels of any contaminants, the Project Safety Officer and Project Superintendent will immediately determine the cause, make changes to work practices or procedures, and if necessary, make changes in site layout and warn unprotected personnel to evacuate or don protective equipment.

In the event of an accident resulting in physical injury, first aid will be administered; and the injured worker will be transported to the nearest hospital for emergency treatment.



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12.0 TRAINING REQUIREMENTS

All personnel assigned to this project will be required to demonstrate that they have completed the Initial Training Requirements (40-hrs.), according to Federal OSHA Standards under 39 CFR 1910.120.

Field personnel from Walton Engineering, Inc., Delta Environmental Consultants and their subcontractors will attend a project-specific training program for safety issues and project work task review before beginning work. The meeting will also be attended by the Project Superintendent and the Project Safety Officer.

- A. All Walton Engineering, Inc. and Delta Environmental Consultants site personnel shall have completed training relative to the project operations plans, and the materials to be encountered during the project. This training shall be conducted by the Delta Environmental Consultants Project Safety Officer, and shall include practical application exercises regarding the hazards to be expected and the protective equipment to be utilized.

This formal training is supplemented by daily safety briefings and site specific training as required. All subcontractor personnel will be required to complete the same basic training, and to attend all safety briefings.

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### 13.0 MEDICAL SURVEILLANCE

Walton Engineering, Inc. and Delta Environmental Consultants personnel and subcontractors engaged in project operations shall be participants in the Medical Surveillance program, and must be cleared by the examining physician(s) to wear respiratory protection devices and protective clothing for working with hazardous materials. The applicable requirements under Federal OSHA, 29 CFR 1910 will be observed.

#### EXAMINATION REQUIREMENTS

All Walton Engineering, Inc. and Delta Environmental Consultants personnel on-site shall have successfully completed a pre-placement or periodic medical examination in accordance with established Walton Engineering, Inc. and Delta Environmental Consultants policies and procedures, and consistent with the provisions of the OSHA carcinogen standards. This examination shall include a complete medical and occupational history, physical examination, and selected biological sampling. Laboratory studies include a complete blood count (CBC), urinalysis, chemistry panel (SMAC), pulmonary function (FEV and FVC), chest X-Ray, audiometry, and vision screening.

---

14.0 RECORDING KEEPING

A. GENERAL

Recording keeping shall be consistent with OSHA regulations in all respects. The following permanent records will be maintained in the Walton Engineering, Inc. headquarter offices:

1. Safety Inspection Reports
2. Personnel Exposure Monitoring Records (spiral or bound permanent log books will be used)
3. OSHA 200 - Current to within 5 days
4. Accident reports consistent with the established Walton Engineering, Inc. procedures

B. MEDICAL RECORDS

Permanent medical records shall be maintained in confidential files by the contract physician/medical clinic. The physician will supply Walton Engineering, Inc. with a medical status document, certifying that the personnel assigned to the project are physically capable of performing their individual work tasks.

15.0 SIGNATURES

Site Health And Safety Plan Approved By:

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name: Mark S. Vendeiro

Title: Project Superintendent  
Walton Engineering, Inc.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name: Keoni Almeida

Title: Project Safety Officer  
Delta Environmental Consultants

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name: Richard S. Walton

Title: Corporate Safety Manager  
Walton Engineering, Inc.

Signature:  \_\_\_\_\_ Date: 10/23/92

Name: Michael E. Walton

Title: President  
Walton Engineering, Inc.

EMERGENCY CONTACT LISTING

	Emergency Number	Alternate Number
Beacon Station #604 - Livermore:		
Fire/Ambulance . . . . .	911 . . . . .	_____
Police . . . . .	911 . . . . .	_____

Hospital Information:

Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_

State & Zip \_\_\_\_\_

Directions:

Additional Contingency Telephone Numbers:

Walton Engineering, Inc. Headquarter Offices . . . (916) 372-1888

Delta Environmental Consultants Offices . . . . . (916) 638-2085

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

*Plan rejected - incomplete  
informed Paul Clark of rejection  
10/13/92*

UNDERGROUND TANK CLOSURE PLAN

\*\*\* Complete according to attached instructions \*\*\*

1. Business Name BEACON # 604  
Business Owner ULTRAMAR INC
2. Site Address 1619 FIRST ST.  
City LIVERMORE zip 94550 Phone (510) 443-7465
3. Mailing Address 525 W. THIRD ST.  
City HANFORD, CA zip 93230 Phone (209) 583-3342
4. Land Owner ULTRAMAR INC.  
Address 525 W. THIRD ST City, State HANFORD, CA zip 93230
5. Generator name under which tank will be manifested ULTRAMAR INC.  
EPA I.D. No. under which tank will be manifested CAL 921764741

6. Contractor - TO BE DETERMINED -  
Address \_\_\_\_\_  
City \_\_\_\_\_ Phone \_\_\_\_\_  
License Type\* \_\_\_\_\_ ID# \_\_\_\_\_

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

7. Consultant DELTA ENVIRONMENTAL CONSULTANTS  
Address 3333 DATA DRIVE #100  
City RANCHO CORDOVA CA Phone (916) 638-2085

8. Contact Person for Investigation  
Name TERRENCE FOX/ULTRAMAR Title SENIOR PROJECT MANAGER  
Phone (916) 583-5545

9. Number of tanks being closed under this plan 3  
Length of piping being removed under this plan 100' ±  
Total number of tanks at facility 3

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

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

a) Product/Residual Sludge/Rinsate Transporter TO BE DETERMINED  
- CONTRACTOR -  
Name \_\_\_\_\_ EPA I.D. No. \_\_\_\_\_  
Hauler License No. \_\_\_\_\_ License Exp. Date \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

b) Product/Residual Sludge/Rinsate Disposal Site TO BE DETERMINED  
- CONTRACTOR -  
Name \_\_\_\_\_ EPA I.D. No. \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

c) Tank and Piping Transporter

TO BE DETERMINED - CONTRACTOR -

Name \_\_\_\_\_ EPA I.D. No. \_\_\_\_\_

Hauler License No. \_\_\_\_\_ License Exp. Date \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

d) Tank and Piping Disposal Site

TO BE DETERMINED - CONTRACTOR -

Name \_\_\_\_\_ EPA I.D. No. \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

11. Experienced Sample Collector

Name \_\_\_\_\_

Company DELTA ENVIRONMENTAL CONSULTANTS

Address 3330 DATA DRIVE # 100

City RANCHO CORDOVA State CA zip 95670 Phone (916) 638-2085

12. Laboratory

Name WEST ENVIRONMENTAL ANALYTICAL

Address 1046 OLIVE DRIVE #3

City DAVIS State CA zip 95616

State Certification No. 1346

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

If yes, describe. VENT LINE LEAK IN 1988 - REPAIRED

\_\_\_\_\_  
\_\_\_\_\_



14. Describe methods to be used for rendering tank inert

TRIPLE RINSE AND VACUUM / DRY ICE; MINIMUM 25 POUNDS  
OF SOLID CARBON DIOXIDE FOR EACH 1,000 GALLONS  
OF TANK CAPACITY

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

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

15. Tank History and Sampling Information

Tank		Material to be sampled (tank contents, soil, ground-water, etc.)	Location and Depth of Samples
Capacity	Use History (see instructions)		
* 10,000	THE TANKS CURRENTLY STORE UNLEADED PRODUCTS BUT LIKELY STORED LEADED PRODUCTS IN THE PAST. <u>AVL</u> GASOLINE - NO DIESEL	SOIL	BENEATH EACH TANK END APPROX. 2' INTO NATIVE SOIL
* 8,000		SOIL	
* 8,000		SOIL	
* ALL TANKS CURRENTLY IN USE		* INSTALLED	IN 1966

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

Excavated/Stockpiled Soil	
Stockpiled Soil Volume (Estimated)	Sampling Plan 1 COMPOSITE SAMPLE OF 4 SAMPLES FOR EVERY 50 YARDS

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

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

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

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit
LEADED GAS		TPH G GC/FID(502)	1.0 PPM
UNLEADED GAS		BTEX 8020	0.005 PPM
		TOTAL LEAD AA	

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

18. Submit Worker's Compensation Certificate copy

Name of Insurer BY CONTRACTOR

19. Submit Plot Plan (See Instructions)

20. Enclose Deposit (See Instructions)

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

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

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

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

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

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

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

Signature of Contractor

Name (please type) PAUL CLARK

Signature \_\_\_\_\_

Date \_\_\_\_\_

Signature of Site Owner or Operator

Name (please type) PAUL CLARK SENIOR ENGINEER

Signature Paul Clark

Date 9/29/92

Tri Valley Tune-up

1737 FIRST STREET  
LIVERMORE, CA 94550

10-20-92

I HAVE LEASED THIS PROPERTY  
SINCE 1984

- ① I HAVE NOT HAD ANY INVENTORY  
LOSS
- ② NO REPAIRS OR REARRANGEMENT OF TANKS  
OR LINES HAVE BEEN MADE
- ③ I HAVE NOT HAD ANY SPILLS/  
CLEAN UPS
- ④ TANK AND LINES TESTED ON  
MAY 10 1982, SEPT 24 1986  
AND JULY 16 1992 WITH NO  
PROBLEMS / LEAKS FOUND.

THANK YOU

  
MARTIN HERNANDEZ JR

92000-02 0001141

COPY SENT 11-30-92

# Ultramar

Ultramar Inc.  
P.O. Box 466  
525 W. Third Street  
Hanford, CA 93232-0466  
(209) 582-0241

Telecopy: 209-584-6113 Credit & Wholesale  
209-583-3330 Administrative  
209-583-3302 Information Services  
209-583-3358 Accounting

September 30, 1992

*Compartmentalized tanks are  
separate - permit each, monitor each*

*tentative Nov 10*

Mr. Jeff Shapiro  
ALAMEDA COUNTY HEALTH AGENCY  
Division of Hazardous Materials  
Department of Environmental Health  
80 Swan Way, Room 200  
Oakland, CA 94621

Dear Mr. Shapiro:

Pursuant to our telephone conversation, please find enclosed the following:

- 1) Check #665812 in the amount of \$1,812.00.
- 2) Alameda County underground tank closure plan application.
- 3) Alameda County underground tank installation plan application.
- 4) Tank and line replacement testing scheme.
- 5) Routine monitoring and response plan.
- 6) Equipment cut sheets.
- 7) Three (3) sets of plans.

As we discussed, the successful General Contractor will supply the information necessary to complete the applications once selected. It is also my understanding that Delta Environmental will be submitting a soil management plan for review and approval.

Thank you for your time and attention to this matter. Should you have any questions or comments, please call me at (209) 583-3342, or Mr. Terry Fox, Ultramar Senior Environmental Manager at (209) 583-5545.

Very truly yours,

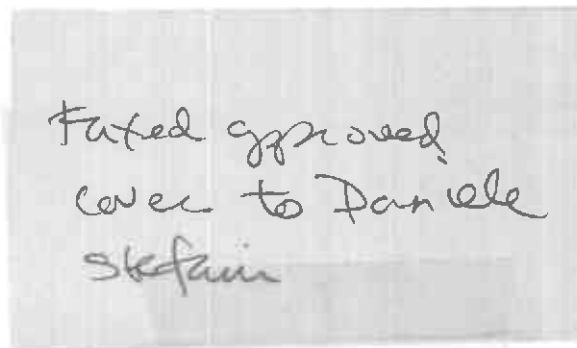
ULTRAMAR INC.



Paul C. Clark  
Senior Engineer

Enclosure

PCC/mas



*Fixed approved  
cover to Daniele  
Stefanin*



A Member of the Ultramar Group of Companies

**BEACON**  
#1 Quality and Service

UNOCAL 76

August 27, 1992

Alameda County  
Health Care Services Agency  
Dep't. of Environmental Health  
80 Swan Way, Rm 200  
Oakland, California 94621  
attn: Ms. Eva Chu

LIVERMORE ARCADE SHOPPING CENTER

Northern Division

Dear Ms. Chu:

In response to your letter to Unocal dated August 18, 1992 requesting information on our Service Station No. 4186 in Livermore, I have enclosed the following:

1. An August 26, 1992 memo from Ms. B.C. Best, the Manager of Environmental Support for Unocal Marketing Engineering and Construction. The memo documents a complete file search of available records, and indicates that there is no evidence of a tank or line leak.
2. Copies of tank and line tightness tests from 1986-1992. Test results show all tanks and lines are tight.

With respect to your request concerning records documenting previous fuel leak cleanups, please be advised that there are no records of any leaks or releases.

With respect to your request for copies of inventory records from the past five (5) years, please be advised that daily inventory reconciliation is the responsibility of the dealer, and his records are kept on the facility premises in accordance with Alameda County HMMP regulations. Any request for review of such records should be made through the dealer.

Please feel free to contact me if I can be of any more assistance.

Sincerely,

*Ronald E. Bock*

Ronald E. Bock  
Area Manager  
Environmental Engineering

enclosures

bcc: P.C. Stern  
B.C. Best  
M. Ornelas

OK  
whitney cas  
198-92

Aug 26, 1992

Ms. Eva Chu,

As per our conversation on Monday, Aug. 24. I told you that the tanks at 1679 First Street had been removed by the Mark Group. There was no contamination found from the gas tanks and only a small amount of oil from the waste oil tank was found and the contamination was completely removed.

You asked that I name the tenants that have been at the First Street property for the last five years

Barry Winfield, The Tire Zone, ~~Feb.~~ Feb. 15, 1983 to May 15, 1988

David Mulqueeny, Livermore Muffler Shop, May 15, 1988 to Dec. 1990

Dean Boller, ABC Smog and Tune Up, March 1991 - Present  
This building is still under lease to David Mulqueeny until May of 1993.

To our knowledge the tanks were not in use after 1984.

If you have any questions, you can contact me. I am Marguerite

Defauli's daughter.

Thank You,  
Donna Buchheit  
642 South L" St.  
Livermore, CA 94550  
510-443-1626

642 South L" Street  
Livermore, CA 94550



920921 1650 26

Alameda County Health Care Services Agency  
Hazardous Materials Program  
80 Swan Way Rm. 200  
Oakland, CA 94621

Attn: Ms. Eva Chu



Memorandum

**UNOCAL**

August 26, 1992

**TO: R.E. BOCK, AREA MANAGER  
ENVIRONMENTAL ENGINEERING**

**FROM: B.C. BEST, MANAGER, ENVIRONMENTAL SUPPORT  
MARKETING ENGINEERING & CONSTRUCTION**

*B.C. Best*

**S.S. 4186  
LIVERMORE, CALIFORNIA  
REVIEW OF UST RECORDS**

We have researched our environmental compliance file on service station #4186 located at 1771 First Street in Livermore, California and have found no evidence of a tank or line leak in the past five years. If you have any other questions regarding the compliance files on this service station, please let me know.

BCB/njw  
4186ust.bob

cc: D.M. Sobieski

Post-It™ brand fax transmittal memo 7871 # of pages > 1

To	RON BOCK	From	BCA BEST
Co.		Co.	
Dept.		Phone #	
Fax #		Fax #	213 627 1231



8-24-92  
Re: prop 1682 1st St. Livermore, Ca  
94550

Dear Eva Chu:

re: your letter of Aug 15<sup>th</sup>, 92 on  
VST records.

Godolieve Vlaminck has no knowledge  
of any VST on premises. Goodyear  
has rented the property for approx  
(1985-) seven years. & they are tire  
& rubber people, so doubt if any VSTs  
are theirs. Believe there was a  
service station there prior but Goodyear  
took out the tanks when they  
moved in. Hope this clears up  
this matter for you. —

Regards

x Godolieve Vlaminck

Alfons: son

↳ (209) 229-7926

G.V. (209) 227-0562

Goodyear

1682-1st St: 447-1944  
(Paul)

1485-1st St 455-4330 (Ryan)

Karen - supervisor - Dublin

833-2700

LU CU

# TANKNOLOGY CORPORATION INTERNATIONAL

5225 Hollister, Houston, Texas 77040-6294

Phone (800) 888-8563

FAX (713) 690-2255

## Certificate of Tightness

Service Order # 48167

Test Date 4/06/92

Underground storage tank system(s) tested and found tight for:

TANK OWNER: UNOCAL 76

TEST SITE ADDRESS: 4186, UNOCAL, 1771 FIRST ST., LIVERMORE, CA 94550

2 TANK(S) ONLY,       2 LINE(S) ONLY,       2 LEAK DETECTOR(S) ONLY.

TANKS SIZES &  
PRODUCTS TESTED

#1 10K SUN #2 10K RUN

LINES TESTED 1A 2A

LEAK DETECTORS TESTED 21286-9886 20990-6102

Unit Mgr. Certificate Number & Name #170, EXPIRES 6/93

DAN MILLIGAN

Valid only with  
Corporate Seal

U.S. Patent #4462249, Canadian Patent #1185693, European Patent Appl. #169283  
TANKNOLOGY & VacuTect are trademarks of TANKNOLOGY CORPORATION INTERNATIONAL

Note: See VacuTect Test Report for tank identification and site location drawing.

AK-04



# VacuTect™ TANK TESTING REPORT

CUSTOMER **UNOCAL 76**  
 INVOICE NAME/ ADDRESS **UNOCAL 76, 911 WILSHIRE BLVD. #1010, LOS ANGELES, CA 90017**  
 SITE NAME/ ADDRESS **UNOCAL, 1771 FIRST ST., LIVERMORE, CA 94550**

SITE # **4186**

S.O. # **48167**  
 DATE **April 6, 1992**  
 PHONE **213-977-5862**  
 ATTN: **STEPHEN CAMPBELL**

TANKS												LINES			Leak Det.		COMMENTS: NOTE ALTERATIONS OR REPAIRS		
See For Loc.	Tank #	Tank Product	Tank Dia.	Tank Gallons	Tank Mat'l ■ Steel (S) Fiber- glass (F) Lined	Dipped Water Level ■ START END	Dipped Product Level ■ START END	Probe Water Level ■ START END	Water Ingress Detected ■ YES NO	Bubble Ingress Detected ■ YES NO	Ullage Air Ingress Detected ■ YES NO	Tight (T) or Fail (F)	Line #	Line Mat'l ■ Steel (S) Fiber- Glass (F)	Deliv. Syst. ■ Pressure (P) Suction (S)	Tight (T) or Fail (F)		Exit LD Pass (P) Fail (F) None (N)	New Pre- Tested LD ■ Sold YES NO
	#1	SUN	91	10K	FRP	NONE 1322 NONE 1722	77.5	.16	NO	NO	NO	T	1A	FRP	P	T			Tanks and Lines Tested to CFR-40 Parts 280-281 and NFPA 329 Spec's.  OTHER:
	#2	RUN	91	10K	FRP	NONE 1322 NONE 1722	81.5	.16	NO	NO	NO	T	2A	FRP	P	T			Exist LD SN: 21286-9886 New LD SN: SHEAR VAL OP? YES Pump Mfg. RED JACKET OF FILL 88
																			Exist LD SN: New LD SN: Pump Mfg.
																			Exist LD SN: New LD SN: Pump Mfg.
																			Exist LD SN: New LD SN: Pump Mfg.
																			Exist LD SN: New LD SN: Pump Mfg.

TANKNOLOGY Regional Office: **NORTHWEST** Unit Number **57**

NOTE: Original VacuTect Data recordings are reviewed by Tanknology's Audit Control Department and maintained on file.

Tanknology Corporation International  
 5225 Hollister St., Houston, TX 77040  
 (800) 888-8563 • FAX (713) 690-2255

H S EUG

### CERTIFICATE OF PRECISION LEAK TEST

Certification #  
9114068

Associated Environmental Systems, Inc. has tested and certifies  
the following:

DATE: 04/10/91 CERTIFIED TESTER: BWH # 88142

LOCATION: Unocal # 4185 1771 First Street, Livermore, CA

TANKS:	TANK	LINE	PROD/LINE
1.	10K R/UL	PASS	PASS
2.	10K S/UL	PASS	PASS
3.	XXXXXXXX	XXXX	XXXX
4.	XXXXXXXX	XXXX	XXXX
5.	XXXXXXXX	XXXX	XXXX
6.	XXXXXXXX	XXXX	XXXX

**ANY FAILURE LISTED MAY REQUIRE  
NOTIFICATION OF AGENCY.**

Recertification Date Recommended:  
04/92

**AES.**  
Associated Environmental Systems

Home Office: P.O. Box 80427, Bakersfield, CA 93380 • 805/383-2212

# Ultramar

Ultramar Inc.  
P.O. Box 466  
525 W. Third Street  
Hanford, CA 93232-0466  
(209) 582-0241

92/01787

Telecopy: 209-584-6113 Credit & Wholesale  
209-583-3330 Administrative  
209-583-3302 Information Services  
209-583-3358 Accounting

FAX (209) 583-3282

Terry: 209-583-5545  
57  
shd 4032

August 19, 1992

Mr. Gil Wistar  
Department of Environmental Health  
Alameda County Health Care Services  
80 Swan Way, Room 200  
Oakland, CA 94612

**SUBJECT: BEACON STATION NO. 604, 1619 FIRST STREET, LIVERMORE, CALIFORNIA**

Dear Mr. Wistar:

This correspondence is in response to the letter from Alameda County Department of Environmental Health to Ultramar Inc. (Ultramar) dated August 7, 1992, regarding the above-referenced Ultramar facility. In that letter the County requested Ultramar supply a review of the following:

1. Inventory records for the past 5 years for each tank;
2. The complete history of any tank and/or piping repairs;
3. Records documenting previous fuel leak cleanups; and
4. Results of tank integrity tests performed within the last 5 years.

The response to your inquiries is as follows:

- 23 CCR requires minimum of 3 years of records

- Tank is "sticked" before and after local delivery. How does this explanation affect the actual delivery? Why should a large negative discrepancy result if delivery/sticking is done correctly?

1. Only inventory records back to December 1990 were available. After reviewing those records, no trend suggesting the loss of product was observed. However, some large negative inventory numbers did occur in the month of July 1992. These negative numbers seem to occur on days in which a delivery was made. Ultramar believes that the negative inventory numbers are due to the delivery truck being parked on a slope while the fuel is being transferred into the underground storage tank and that the fuel in the tanker is shifting to the side of the tanker away from the pump. Consequently, not all of the reported delivery is pumped into the underground storage tank. This anomaly is still being investigated by Ultramar.



A Member of the Ultramar Group of Companies

**BEACON**  
#1 Quality and Service

2. The readily available maintenance records extend back to 1986. Since that time only one repair has been performed. In 1988, a leak in the regular gasoline vapor line was detected through the tank test. The line was subsequently repaired and the system was retested. The results indicated that the system tested tight.
3. There are no records in our files documenting any fuel leak cleanup. A soil gas survey was performed in October 1990 in the tank cavity backfill and results indicated that no hydrocarbon vapors were detected.
4. With the exception of 1987, integrity tests have been performed every year since 1986. Every year except in 1988 the systems have tested tight. As mentioned above, in 1988 the vapor line on the regular tank was determined to have a leak. The vapor was repaired and the system was retested and results indicated the system was tight. The product lines were tested in July of this year and they tested tight. No tank test has been scheduled for 1992 because the tanks and lines are scheduled to be replaced in October 1992.

Ultramar hopes that this information meets your needs. Please call if you have any questions regarding this site.

Sincerely,

**ULTRAMAR INC.**

*Terrence A. Fox*

Terrence A. Fox  
Senior Project Manager  
Marketing Environmental Department

*Ventlines -*

*vapor return line  
or vent line*



Alta Lindbeck  
3151 - 300 Ave E  
Oak Harbor WA 98277

92 AUG 25 10 25

August 18, 1992

Eva Chu  
Hazardous Material Specialist  
Alameda County  
Health Care Services

RE: Review of UTS Records  
at 1737 First St  
Livermore CA 94550

Dear Ms Chu:

I am writing you in reference to your letter of August 18, 1992 concerning records of UTS at 1737 First St, Livermore CA .

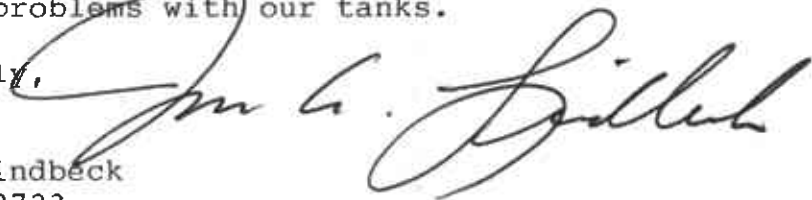
My mother, Alta Lindbeck, leases the above mentioned property to Mr. Martin Hernades DBA Tri-Valley Tune Up.

I am sending you the only records we have. Mr Hernandez, the operator of Tri-Valley Tune Up, has the records of inventory on the gasoline that goes through the tanks.

1. Inventory records for past 5 years for each tank  
Martin Hernandes  
1737 First St  
Livermore CA 94550
2. Complete history of any tank or piping repairs  
(None since installation)
3. Records documenting previous fuel leak cleanups  
(None since installation)
4. Results of tank integrity tests performed within  
the past 5 years  
Martin Hernandes  
1737 First St  
Livermore CA 94550

I hope this letter provides the satisfactory information you require. I look forward to hearing from you, and I hope there are no problems with our tanks.

Sincerely,



Jon A Lindbeck  
PO Box 2723  
Oak Harbor WA 98277

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



BAFAT 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

August 18, 1992

Alta Lindbeck  
3151, 3000 Ave #E  
Oak Harbor, WA 98277

**Subject: Notice to Review UST Records at 1737 First Street,  
Livermore, CA 94550**

Dear Ms. Lindbeck:

Our office is in the process of investigating a report from the Livermore Arcade Shopping Center regarding the detection of petroleum hydrocarbon products in their upgradient monitoring wells. These wells are part of a San Francisco Bay Regional Water Quality Control Board (RWQCB) investigation of ground water beneath the site shown to be impacted by chlorinated solvents.

Our part of the investigation is to identify owners/operators who are operating or have operated (in the past 5 years) underground storage tanks (USTs) located upgradient from the Livermore Arcade site and requiring them to review:

1. Inventory records for the past 5 years for each tank;
2. The complete history of any tank and/or piping repairs;
3. Records documenting previous fuel leak cleanups; and,
4. Results of tank integrity tests performed within the last 5 years.

Tri Valley Tune-up, located topographically upgradient from the Livermore Arcade site, is one of several potential source sites for the hydrocarbon contamination noted above. Therefore, you are directed to perform the specific tasks, as outlined above, in order to determine whether your facility has suffered a release of product from the USTs. These requirements are imposed under authority granted by the Water Code - Title 23, Chapter 3, California Code of Regulations, on behalf of the S.F. RWQCB.

The results of this record review are to be summarized and submitted to this office **within 15 days of the date of this letter.**

Following review of these documents, we will advise you of any further steps or procedures which you will be required to perform.

Should you have any questions, please contact me at the above number.

Sincerely,



Eva Chu  
Hazardous Materials Specialist

cc: Lester Feldman, RWQCB  
Mark Thomson, Alamada County District Attorney's Office  
Danielle Stefani, Livermore Fire Department  
John Hyjer, ADG Development, 44 Montgomery, Suite 1550,  
San Francisco, CA 94104  
Martin Hernandez, Tri Valley Tune Up, 1737 1st St.,  
Livermore, 94550  
Edgar Howell/files

Arcade4

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

August 18, 1992

Ron Bock  
UNOCAL  
P.O. Box 5155  
San Ramon, CA 94583

RECEIVED

AUG 20 1992

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

**Subject: Notice to Review UST Records at 1771 First Street,  
Livermore, CA 94550**

Dear Mr. Bock:

Our office is in the process of investigating a report from the Livermore Arcade Shopping Center regarding the detection of petroleum hydrocarbon products in their upgradient monitoring wells. These wells are part of a San Francisco Bay Regional Water Quality Control Board (RWQCB) investigation of ground water beneath the site shown to be impacted by chlorinated solvents.

Our part of the investigation is to identify owners/operators who are operating or have operated (in the past 5 years) underground storage tanks (USTs) located upgradient from the Livermore Arcade site and requiring them to review:

1. Inventory records for the past 5 years for each tank;
2. The complete history of any tank and/or piping repairs;
3. Records documenting previous fuel leak cleanups; and,
4. Results of tank integrity tests performed within the last 5 years.

Unocal Station, located topographically upgradient from the Livermore Arcade site, is one of several potential source sites for the hydrocarbon contamination noted above. Therefore, you are directed to perform the specific tasks, as outlined above, in order to determine whether your facility has suffered a release of product from the USTs. These requirements are imposed under authority granted by the Water Code - Title 23, Chapter 3, California Code of Regulations, on behalf of the S.F. RWQCB.

The results of this record review are to be summarized and submitted to this office **within 15 days of the date of this letter.**

Following review of these documents, we will advise you of any further steps or procedures which you will be required to perform.

Should you have any questions, please contact me at the above number.

Sincerely,



Eva Chu  
Hazardous Materials Specialist

cc: Lester Feldman, RWQCB  
Mark Thomson, Alameda County District Attorney's Office  
Danielle Stefani, Livermore Fire Department  
John Hyjer, ADG Development, 44 Montgomery, Suite 1550,  
San Francisco, CA 94104  
Edgar Howell/files

Arcade5

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

August 18, 1992

Godelieve Vlaminck  
2212 E. Farren Ave.  
Fresno, CA 93726

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

**Subject: Notice to Review UST Records at 1682 First Street,  
Livermore, CA 94550**

Dear Sir:

Our office is in the process of investigating a report from the Livermore Arcade Shopping Center regarding the detection of petroleum hydrocarbon products in their upgradient monitoring wells. These wells are part of a San Francisco Bay Regional Water Quality Control Board (RWQCB) investigation of ground water beneath the site shown to be impacted by chlorinated solvents.

Our part of the investigation is to identify owners/operators who are operating or have operated (in the past 5 years) underground storage tanks (USTs) located upgradient from the Livermore Arcade site and requiring them to review:

1. Inventory records for the past 5 years for each tank;
2. The complete history of any tank and/or piping repairs;
3. Records documenting previous fuel leak cleanups; and,
4. Results of tank integrity tests performed within the last 5 years.

RY-NCK Tire and Brakes, Inc., located topographically upgradient from the Livermore Arcade site, is one of several potential source sites for the hydrocarbon contamination noted above. Therefore, you are directed to perform the specific tasks, as outlined above, in order to determine whether your facility has suffered a release of product from the USTs. These requirements are imposed under authority granted by the Water Code - Title 23, Chapter 3, California Code of Regulations, on behalf of the S.F. RWQCB.

The results of this record review are to be summarized and submitted to this office **within 15 days of the date of this letter.**

Following review of these documents, we will advise you of any further steps or procedures which you will be required to perform.

Should you have any questions, please contact me at the above number.

Sincerely,



Eva Chu  
Hazardous Materials Specialist

cc: Lester Feldman, RWQCB  
Mark Thomson, Alamada County District Attorney's Office  
Danielle Stefani, Livermore Fire Department  
John Hyjer, ADG Development, 44 Montgomery, Suite 1550,  
San Francisco, CA 94104  
Bob Maas, Ry-Nck Tire, 1682 1st St., Livermore, 94550  
Edgar Howell/files

Arcade3

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

August 18, 1992

Alta Lindbeck  
3151, ~~3000 Ave #E~~ 300 Ave E  
Oak Harbor, WA 98277

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

**Subject: Notice to Review UST Records at 1737 First Street,  
Livermore, CA 94550**

Dear Ms. Lindbeck:

Our office is in the process of investigating a report from the Livermore Arcade Shopping Center regarding the detection of petroleum hydrocarbon products in their upgradient monitoring wells. These wells are part of a San Francisco Bay Regional Water Quality Control Board (RWQCB) investigation of ground water beneath the site shown to be impacted by chlorinated solvents.

Our part of the investigation is to identify owners/operators who are operating or have operated (in the past 5 years) underground storage tanks (USTs) located upgradient from the Livermore Arcade site and requiring them to review:

1. Inventory records for the past 5 years for each tank;
2. The complete history of any tank and/or piping repairs;
3. Records documenting previous fuel leak cleanups; and,
4. Results of tank integrity tests performed within the last 5 years.

Tri Valley Tune-up, located topographically upgradient from the Livermore Arcade site, is one of several potential source sites for the hydrocarbon contamination noted above. Therefore, you are directed to perform the specific tasks, as outlined above, in order to determine whether your facility has suffered a release of product from the USTs. These requirements are imposed under authority granted by the Water Code - Title 23, Chapter 3, California Code of Regulations, on behalf of the S.F. RWQCB.

The results of this record review are to be summarized and submitted to this office within 15 days of the date of this letter.

Following review of these documents, we will advise you of any further steps or procedures which you will be required to perform.



Should you have any questions, please contact me at the above number.

Sincerely,



Eva Chu  
Hazardous Materials Specialist

cc: Lester Feldman, RWQCB  
Mark Thomson, Alamada County District Attorney's Office  
Danielle Stefani, Livermore Fire Department  
John Hyjer, ADG Development, 44 Montgomery, Suite 1550,  
San Francisco, CA 94104  
Martin Hernandez, Tri Valley Tune Up, 1737 1st St.,  
Livermore, 94550  
Edgar Howell/files

Arcades†

Summary due Sep 9

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

August 10, 1992

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

Marguerite DePaoli Tr.  
558 South L Street  
Livermore, CA 94550

**Subject: Notice to Review UST Records at 1679 First Street,  
Livermore, CA 94550**

Dear Ms. DePaoli:

Our office is in the process of investigating a report from the Livermore Arcade Shopping Center regarding the detection of petroleum hydrocarbon products in their upgradient monitoring wells. These wells are part of a San Francisco Bay Regional Water Quality Control Board (RWQCB) investigation of ground water beneath the site shown to be impacted by chlorinated solvents.

Our part of the investigation is to identify owners/operators who are operating or have operated (in the past 5 years) underground storage tanks (USTs) located upgradient from the Livermore Arcade site and requiring them to review:

1. Inventory records for the past 5 years for each tank;
2. The complete history of any tank and/or piping repairs;
3. Records documenting previous fuel leak cleanups; and,
4. Results of tank integrity tests performed within the last 5 years.

ABC Smog and Tune, located topographically upgradient from the Livermore Arcade site, is one of several potential source sites for the hydrocarbon contamination noted above. Therefore, you are directed to perform the specific tasks, as outlined above, in order to determine whether your facility has suffered a release of product from the USTs. These requirements are imposed under authority granted by the Water Code - Title 23, Chapter 3, California Code of Regulations, on behalf of the S.F. RWQCB.

The results of this record review are to be summarized and submitted to this office **within 15 days of the date of this letter.**

Following review of these documents, we will advise you of any further steps or procedures which you will be required to perform.

Should you have any questions, please contact Ms. Eva Chu at  
(510) 271-4530.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Lester Feldman, RWQCB  
Mark Thomson, Alamada County District Attorney's Office  
Danielle Stefani, Livermore Fire Department  
John Hyjer, ADG Development, 44 Montgomery, Suite 1550,  
San Francisco, CA 94104  
Dean Boller, ABC Smog and Tune Up, 1679 1st St., Livermore  
94550  
~~Edgar Howard~~/files

Arcade2

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

RAFAT A. SHAHID, Assistant Agency Director

StID 4032

August 7, 1992

Terrence Fox  
Ultramar Inc.  
P.O. Box 466  
Hanford, CA 93232-0466

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

**Subject: Notice to Review UST Records at Beacon #604, 1619 First Street, Livermore**

Dear Mr. Fox:

Our office is in the process of investigating a report from the Livermore Arcade Shopping Center regarding the detection of petroleum hydrocarbon products in their upgradient monitoring wells. These wells are part of a San Francisco Bay Regional Water Quality Control Board (RWQCB) investigation of ground water beneath the site shown to be impacted by chlorinated solvents.

Our part of the investigation is to identify owners/operators of underground storage tanks (USTs) located upgradient from the Livermore Arcade site and requiring them to review:

1. Inventory records for the past 5 years for each tank;
2. The complete history of any tank and/or piping repairs;
3. Records documenting previous fuel leak cleanups; and,
4. Results of tank integrity tests performed within the last 5 years.

Beacon Station #604, located topographically upgradient from the Livermore Arcade site, is one of several potential source sites for the hydrocarbon contamination noted above. Therefore, you are directed to perform the specific tasks, as outlined above, in order to determine whether your facility has suffered a release of product from the USTs. These requirements are imposed under authority granted by the Water Code - Title 23, Chapter 3, California Code of Regulations, on behalf of the S.F. RWQCB.

The results of this record review are to be summarized and submitted to this office **within 15 days of the date of this letter.**

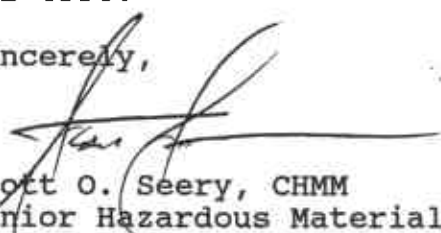
Following review of these documents, we will advise you of any further steps or procedures which you will be required to perform.

Terrence Fox  
1619 1st St., Livermore  
August 7, 1992

Page 2

Should you have any questions, please contact Ms. Eva Chu at (510) 271-4530.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Lester Feldman, RWQCB  
Mark Thomson, Alamada County District Attorney's Office  
Danielle Stefani, Livermore Fire Department  
John Hyjer, ADG Development, 44 Montgomery, Suite 1550,  
San Francisco, 94104  
~~Edgar Howell/files~~

lvarcde2

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**

Phone: (510) 464-1255

**SAN FRANCISCO BAY REGION**

Fax: (510) 464-1380

2101 WEBSTER STREET, SUITE 500

OAKLAND 94612

August 6, 1992

File No. 2223.09:(AB)



Alan C. Waltner  
Attorney at Law  
1736 Franklin Street, Eighth Floor  
Oakland, CA 94612

**SUBJECT: LIVERMORE ARCADE SITE CLEANUP**

Dear Mr. Waltner:

This letter is written in follow-up to discussions held with Lester Feldman and Rico Duazo of my staff concerning the investigation and proposed cleanup of PCE in the soil and groundwater at the subject site. I understand that investigations conducted on behalf of Grubb & Ellis Realty Income Trust by H+GCL, Inc. concluded that PCE releases from the former Mike's Cleaners and possibly Paul's Cleaners at the Livermore Arcade have polluted the soil and groundwater at levels considered a threat to public health and the environment. This conclusion was based upon a site-specific investigation and risk assessment and current drinking water standards which are applicable in the shallow and deep groundwaters at the site. I also understand that your studies have concluded that gasoline hydrocarbons are migrating onto the site from an upgradient source.

At a meeting with staff on August 4, 1992 the Draft Feasibility Study (FS) dated July 9, 1992 was discussed. Staff indicated that all investigations and studies completed thus far were reasonable and that the proposed implementation of a vacuum extraction system with follow-up air sparging appears to be an acceptable method of abatement for the current pollution of the soil and groundwater. This Regional Board staff has no objection to your proceeding with implementation of the recommended plan which we consider to be interim treatment at this time.

Staff also discussed some deficiencies with the Draft FS and with the Remedial Investigation (RI) Report dated April, 1992. These are as follows:

1. The RI concludes, based upon sampling of nearby California Water Service (CWS) water supply wells, that the second water bearing zone is free of pollutants other than an isolated un-verified "hit" of toluene. While this may be the case we cannot concur with your conclusions at this time. We agree that continued re-sampling of the CWS wells are appropriate to verify the toluene "hit". It may however be inappropriate to use the CWS wells as a "warning system" should there be PCE and its derivatives in the second water bearing zone. Therefore a well screened in the second zone is appropriate. This location and methods should be discussed with staff.
2. The FS does not fully conform to current practices and policies of the Regional Board. The Sources of Drinking Water Policy should be fully discussed in the report. The Risk Assessment must be based upon the maximum levels of shallow zone water pollution to derive the base

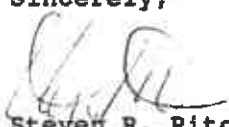
condition, even though the current analysis concludes an ~~increased~~ <sup>increased</sup> risk <sup>ARD</sup> to human health from groundwater injection. The proposed cleanup of the soil and groundwater to a 100 ppb level of PCE in the groundwater is not acceptable in that it would not lower the excess cancer risk to levels consistent with Board and EPA practices. Therefore new target goals should be derived for the proposed alternative.

Staff has discussed the off-site upgradient source of hydrocarbons with the Alameda County Health Department's Hazardous Materials Division, Local Oversight Program Section. They are currently reviewing the possible hydrocarbon sources in the area and will be taking the lead in requiring appropriate investigations and cleanups for the sources.

We are appreciative of the efforts of Grubb & Ellis in voluntarily pursuing the investigations at the Livermore Arcade, in proposing cleanup and monitoring for the area's soil and groundwater, and in identifying other potential sources of groundwater and soil pollution in the vicinity of the Livermore Arcade. Once again we believe cleanup of the present VOC problem at the Livermore Arcade Site is appropriate and we have no objection to your proceeding with the recommended plan for the shallow zone at this time. Please keep staff informed of your progress in this regard, and please coordinate additional investigations and monitoring with staff. Direct any inquiries to Lester Feldman of my staff at (510) 464-1332. <sup>SM</sup>

29

Sincerely,

  
Steven R. Ritchie,  
Executive Officer

cc: Eva Chu, Alameda County Health LOP  
Michael Wright, H+GCL, Inc.

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

August 5, 1992

Mr. John Hyjer  
ADG Development  
44 Montgomery, Suite 1550  
San Francisco, CA 94104

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

**Subject: Offsite Contamination of Petroleum Hydrocarbons at  
Livermore Arcade Shopping Center**

Dear Mr. Hyjer:

I have reviewed the data collected by your consultant, Mr. Karl Novak of H+GCL, detailing the detection of petroleum hydrocarbons in the up-gradient monitoring wells at the Livermore Arcade, and at the Security Pacific Bank. It appears that the source of contamination originates from offsite.

An investigation to identify the responsible party (or parties) to the unauthorized release of petroleum hydrocarbons will commence with a preliminary survey of the sites in the immediate vicinity south and southeast of the Livermore Arcade which are operating or have operated underground storage tanks (USTs) in the past 5 years. Owners/operators of USTs will be required to review their inventory records and complete history of tank/piping leaks or repairs or previous fuel leak cleanups.

Based on the results of this investigation, potential source sites may be required to conduct an initial soil/groundwater investigation.

A preliminary initial site visit has identified the following sites to have or have had USTs:

1. 1619 1st Street, Beacon Station
2. 1679 1st Street, ABC Smog and Tune
3. 1737 1st Street, Tri Valley Tune-up
4. 1771 1st Street, UNOCAL
5. 1682 1st Street, Goodyear


If you have any question 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:  Karl Novak, H+GCL, 2200 Powell St., Suite 880, Emeryville,  
94608  
Rich Hiett, RWQCB  
Grubb & Ellis Realty Income Trust, 1 Montgomery St., San  
Francisco, 94104  
Edgar Howell/files

livarcde



2200 Powell Street, Ste. 880 • Emeryville, CA 94608  
(510) 547-3886 • FAX: (510) 547-3631

7/28/92

Eva Chu  
Alameda County Health Agency  
80 Swan Way, Room 200  
Oakland, CA 94621

RE: Livermore Arcade/Beacon Oil Gasoline Contamination Plume

Dear Ms. Chu:

On behalf of Grubb & Ellis Realty, H<sup>+</sup>GCL has enclosed with this letter monitoring well sampling data to demonstrate that the Livermore Arcade Shopping Center (Arcade site) is not the source of the gasoline constituents which have been found in on and off site wells.

The gasoline plume has intermingled with a PCE plume originating at Mike's Cleaners of the Arcade site. This has seriously slowed the cleanup of the PCE contamination currently being performed by soil vapor extraction.

In addition, recent testing of California Water Service Wells 3 and 8 (CWS-3, CWS-8) found 0.3 ug/l of toluene in CWS-8. Though this is a low and legal concentration, it indicates that the gasoline plume may have spread to the deeper aquifer threatening water supplies.

Research obtained during the performance of a Phase I environmental site assessment showed no current or historical sources of gasoline at the Arcade site. In addition, data obtained from a monitoring well upgradient of the Arcade site (MW-16) found significantly higher levels of gasoline components than a monitoring well (MW-1) which is located on the Arcade site. Both wells were sampled on the same day.

The gasoline plume appears to be originating from the Beacon Oil Station at the intersection of First Street and P Street. In a statement provided to H<sup>+</sup>GCL, Becker Engineering of Napa, CA said that they repaired badly leaking pipes at the Beacon Oil Station in the late 1980's. It is possible that a monitoring well has already been installed on their property and that groundwater analysis data is readily available.

H<sup>+</sup>GCL has found no evidence of on-site sources of gasoline contaminants at the Arcade site. We hope that Alameda County will vigorously pursue action from the up-gradient source of this plume.

Sincerely

H<sup>+</sup>GCL

Karl W. Novak, P.E., R.E.A.  
Director, Engineering and Hydrogeology

Attachment: Well Data

NOTICE OF PUBLIC MEETING

LIVERMORE ARCADE SHOPPING CENTER REMEDIATION

The Livermore Arcade Shopping Center, located at First and South P Street in downtown Livermore, is currently considering options for cleanup of tetrachloroethylene contamination of soils and shallow groundwater. A draft Remedial Investigation/Feasibility Study (RI/FS) describing the results of the investigation of the site and the proposed selection of remedy is available for public review and comment. A Public Meeting will be held on Tuesday, August 4, 1992, at 3:30 pm at the Livermore Chamber of Commerce Office at 2157 First Street, Livermore, California, to receive comments and answer questions about the site and proposed remediation. If you would like more information or to receive a copy of the draft RI/FS, please contact the site manager, John Hyjer, Grubb & Ellis Realty Income Trust, One Montgomery Street, San Francisco, California 94103, Telephone: (415) 956-1990. Written comments on the draft RI/FS can be submitted to the site manager until August 10, 1992.

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ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



April 19, 1991

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

Ms. Julie M. Caldwell  
Environmental Coordinator  
Ultramar, Inc.  
525 W. Third St.  
Hanford, CA 93232-0466

RE: **Subsurface contamination originating from Beacon #604, 1619  
First St., Livermore**

Dear Ms. Caldwell:

As you may be aware, there has been a subsurface investigation over the past year or so at the Livermore Arcade Shopping Center in Livermore, which is diagonally across the street from the Beacon station shown above. During the course of this investigation, the property manager's consultant found groundwater contamination in a monitoring well that is located at the northwest corner of the intersection of First St. and P St. In this well, which is immediately downgradient from Beacon #604, sample results from March 1990 show 84 ppm TPH-gasoline and 11 ppm benzene, as well as other aromatics, dissolved in the groundwater.

Over the summer of 1990, I believe that your consultant requested access to this monitoring well (MW-1). However, since that time we have received no reports, work plans, or any other information from Beacon regarding this situation. Even though the three product tanks tested "tight" in the March 1990 precision tests, the proximity of MW-1 to the Beacon station, the concentration of hydrocarbons in this well, and the lack of any other nearby upgradient sources of gasoline would seem to implicate 1619 First St. as the source of groundwater contamination.

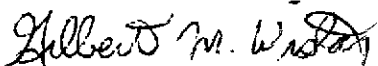
Therefore, this office is requiring Beacon to initiate a subsurface investigation, to consist of the installation of monitoring wells in the immediate vicinity of the three underground tanks. Please submit a proposal for this work to this office by **May 24, 1991**. This work plan must include a schedule for implementation of specific tasks. We suggest that the work plan be developed with the understanding that we may require groundwater/soil remediation in the future. To this end, the well installation report will be due 30 days after the receipt of analytical results, and must contain recommendations for further work, as warranted. Copies of all technical documents should also be sent to the Regional Water Quality Control Board in Oakland (attention: Lester Feldman).

Ms. Julie M. Caldwell  
April 19, 1991  
Page 2 of 2

Because we are overseeing this site under the designated authority of the Water Board, this letter constitutes a formal request for technical reports, per Sec. 13267(b) of the California Water Code. Failure to respond in a timely manner could result in civil liabilities under the Water Code of up to \$1,000 per day. Other violations of California law may also be cited.

If you have any questions about this letter or about subsurface investigation requirements established by the RWQCB, please contact the undersigned at (415) 271-4320.

Sincerely,



Gil Wistar  
Hazardous Materials Specialist

cc: Danielle Stefani, Livermore Fire Dept.  
Lester Feldman, San Francisco Bay RWQCB  
Rafat Shahid, Asst. Agency Director, Environmental Health  
files



**ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY  
 DEPARTMENT OF ENVIRONMENTAL HEALTH  
 HAZARDOUS MATERIALS DIVISION  
 80 SWAN WAY, ROOM 200  
 OAKLAND, CA 94621  
 PHONE NO. 415/271-4320**

SHOWS ONLY WITH COMMENTS  
 NOT FOR ALL INFORMATION

This information is dependent on complete and accurate data provided by the owner and is not to be used for any other purpose.

Date and Time

This information is dependent on complete and accurate data provided by the owner and is not to be used for any other purpose.

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ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

**UNDERGROUND TANK CLOSURE/MODIFICATION PLANS**

1. Business Name Beacon Station No. 604  
 Business Owner Ultramar Inc.
2. Site Address 1619 First Street  
 City Livermore Zip 94550 Phone 415-443-7465
3. Mailing Address As Above  
 City \_\_\_\_\_ Zip \_\_\_\_\_ Phone \_\_\_\_\_
4. Land Owner Ultramar Inc.  
 Address 525 West Third Street City, State Hanford, CA Zip 93230
5. EPA I.D. No. CAC000204133
6. Contractor D & B Construction  
 Address 2634 Pacer Lane  
 City San Jose, CA 95111 Phone 408-226-1920  
 License Type A ID# 396115
7. Consultant Delta Environmental Consultants  
 Address 3330 Data Drive  
 City Rancho Cordova, CA 95670 Phone 916-638-2085

4552947  
 333e  
 Nov. 2, 89

8. Contact Person for Investigation

Name Dale Van Dam/Delta Environmental Title Registered Geologist  
Phone 916-638-2085

9. Total No. of Tanks at facility 4 (only one tank to be removed)

10. Have permit applications for all tanks been submitted to this office? Yes [ ] No [ ]

(Please see Alameda City Letters of March 15 and June 26, 1989)

11. State Registered Hazardous Waste Transporters/Facilities

a) Product/Waste Tranporter

Name Tank is empty EPA I.D. No. \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

b) Rinsate Transporter

Name H & H Ship Service EPA I.D. No. CAD004771168  
Address 220 China Basin Street  
City San Francisco State CA Zip 94107

c) Tank Transporter

Name As Above EPA I.D. No. \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

d) Tank Disposal Site

Name As Above EPA I.D. No. \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

e) Contaminated Soil Transporter

Name If soil is contaminated, it will be treated onsite. EPA I.D. No. \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_



12. Sample Collector

Name Sampler to be determined  
 Company Delta Environmental Consultants  
 Address 3330 Data Drive  
 City Rancho Cordova State CA Zip 95670 Phone 916-638-2085

13. Sampling Information for each tank or area

Tank or Area		Material sampled	Location & Depth
Capacity	Historic Contents (past 5 years)		
10,000 gals.	Unleaded gasoline	N/A	N/A
8,000 gals.	Unleaded gasoline	N/A	N/A
8,000 gals.	Leaded gasoline	N/A	N/A
550 gals.	Waste Oil	N/A	N/A

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

If yes, describe. \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

15. NFPA methods used for rendering tank inert? Yes [xx] No [ ]

If yes, describe. Dry ice will be placed in the tank after it has been  
pressure washed.

An explosion proof combustible gas meter shall be used to verify tank inertness.

16. Laboratories

Name Mobile Chem Labs Inc.  
 Address 1678 Reliez Valley Road  
 City Lafayette State CA Zip 94549  
 State Certification No. 195 and 289

17. Chemical Methods to be used for Analyzing Samples

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Number
Waste Oil		TPHg: (5030) 8015 TPHd: (3550) 8015 O&G: 503D&E BTEX: 8020 CL HC: 8010

18. Submit Site Safety Plan

19. Workman's Compensation: Yes  No [ ]

Copy of Certificate enclosed? Yes [ ] No  Being Mailed

Name of Insurer ZENETH

20. Plot Plan submitted? Yes  No [ ]

21. Deposit enclosed? Yes [ ] No [ ]

22. Please forward to this office the following information within 60 days after receipt of sample results.

- a) Chain of Custody Sheets
- b) Original Signed Laboratory Reports
- c) TSD to Generator copies of wastes shipped and received
- d) Attachment A summarizing laboratory results

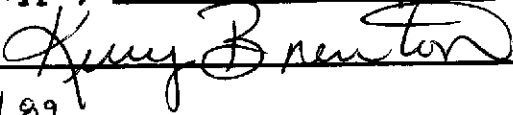
I declare that to the best of my knowledge and belief the statements and information provided above are correct and true. I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

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


I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel and safety.

I will notify the Department of Environmental Health at least two (2) working days (48 hours) after approval of this closure plan in advance to schedule any required inspections. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

**Signature of Contractor**

Name (please type) KERRY Brenton  
Signature   
Date 10/31/89

**Signature of Site Owner or Operator**

Name (please type) Glenn R. Dembroff for Ultramar Inc.  
Signature   
Date 10-16-89

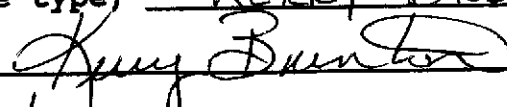
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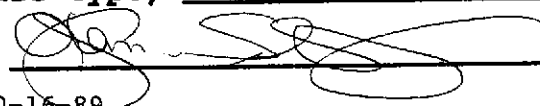
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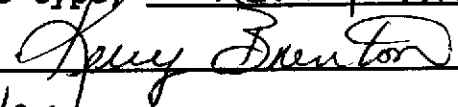
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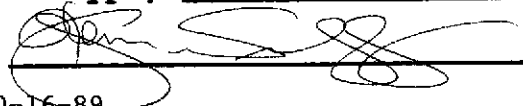
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Date 10/31/89

Signature of Site Owner or Operator

Name (please type) Glenn R. Dembroff for Ultramar Inc.  
Signature   
Date 10-16-89



POST ON-SITE

FIELD INVESTIGATION TEAM  
SITE HEALTH AND SAFETY PLAN  
PETROLEUM SITES

A. GENERAL INFORMATION

Client: Ultramar Inc (Beacon Oil Co) Delta Project Number: 40-89-095  
Site Name: Beacon Station #604 Client Claim/P.O. Number: 604-3163-A  
Street Address: 1619 First Avenue, Livermore, CA  
Plan Prepared by: Dale van Dam Date: 10/13/89  
Approved by: Date:  
Revised by: Date:  
Revision Approved by: Date:

Objectives:

- Phase I - observe excavation of 500-gal waste oil tank, collect soil sample  
from beneath tank  
Phase II -  
Phase III -

Proposed Date of Investigation: 10/23/89

Hazard Summary/Level of Protection:

A: \_\_\_\_\_ B: \_\_\_\_\_ C: \_\_\_\_\_ D: K (with modifications - see Section D.1)

**B. SITE/WASTE CHARACTERISTICS**

Waste/Contaminant Type(s): Liquid X Soil X Solid      Sludge      Gas     

Characteristic(s): Corrosive      Ignitable X Radioactive       
Volatile X Toxic X Reactive       
Unknown      Other (Name)                                     

Facility Description: Operating gasoline service station.

Contaminant Source (type and location): 500-gallon waste oil tank - no reported leaks or loss of stored liquids

Surrounding Features (residences, power lines, terrain, surface water bodies, etc.):  
retail/commercial (see attached site map)

Status (active, inactive, unknown): Active

History (worker or non-worker injury; complaints from public; previous agency action):  
Ultramar Inc has decided to remove 500-gallon waste oil tank from site as part of ongoing facilities upgrade program. No reported leaks or releases on file. No data to suggest tank is releasing stored liquids.



C. HAZARD EVALUATION

Have all contaminants been identified that may be present on site? Yes \_\_\_ No X

List all chemicals below that have been identified or are suspected on site and their maximum concentrations in soil/water. Information on hazardous properties are listed in the appendix. For chemicals not shown in the appendix, enter the hazardous property information in the spaces provided.

<u>Chemical Name</u>	<u>Maximum Concentration in Soil</u>	<u>Maximum Concentration in Water</u>
Gasoline (total HC)	ND ug/kg (ppb)	NA ug/l (ppb)
Benzene	ND ug/kg (ppb)	NA ug/l (ppb)
Total Lead	ND ug/kg (ppb)	NA ug/l (ppb)

ND = not determined at this time  
NA = not applicable at this time

Free product present? Yes \_\_\_ No \_\_\_ Unknown - no reports indicate free product  
Type of product present: Leaded \_\_\_ Unleaded \_\_\_ Diesel \_\_\_ Waste motor oil

P = results pending

**D. SITE SAFETY WORK PLAN**

**PERSONNEL:**

Team Members (list)

Dale A. van Dam  
Dale A. van Dam  
Glenn Dembross (Ultramar Inc)  
Dale A. van Dam

Responsibility

Project Manager  
Site Safety Officer  
Public Information  
Field Team Leader

**PERIMETER ESTABLISHMENT:**

Map/Sketch Attached? Yes  No  Site Secured? Yes  No   
Perimeter Identified? Yes  No  Zone(s) of Contamination Identified? Yes  No   
Free Product? Yes  No  Dissolved? Yes  No  or unknown

**INVESTIGATION-DERIVED MATERIAL DISPOSAL:**

Soil excavated during tank removal will be stock piled on site pending results of lab analyses. When results received, soil will be transferred to appropriate licensed landfill.

DI. PERSONAL SAFETY

**SITE ENTRY PROCEDURES:**

**PERSONNEL PROTECTION:**

Level of Protection: A \_\_\_ B \_\_\_ C \_\_\_ D X

**Modifications:**

1. All personnel must wear hardhat, safety shoes, safety glasses and/or face shield.
2. Neoprene gloves and tyvek/saranax suit should be worn if contact with contaminated water or soil is likely.
3. Hearing protection must be worn if noise levels prevent normal conversation at a distance of three feet. No smoking, eating, or drinking is allowed on site.
4. No personnel are to enter or approach any excavation area where there is a danger of wall collapse or confined space entry.
5. Respiratory protection is dependent on conditions listed in next section.

**Surveillance Equipment and Materials:**

<u>Instrumentation</u>	<u>Action Level</u>	<u>Action</u>
photoionization detector (hNu)	5 units or 5 times background (breathing zone)	use half-mask respirator with organic vapor cartridges
	1000 ppm	eliminate all ignition sources, leave site until levels are reduced
oxygen meter	< 19.5 % oxygen	do not enter area or confined space
explosimeter	> 10 % LEL	eliminate all ignition sources and
	> 20 % LEL	reduce levels immediately or leave site

} portable unit will be on site at all times

**First Aid Equipment:** Standard first aid kit, portable eye wash

**First Aid Procedures:**

Ingestion: DO NOT induce vomiting, summon medical help

Inhalation: Move victim to fresh air, seek medical attention if needed

Dermal Exposure: Remove contaminated clothing, flush with water

D.1 Personal Safety (Continued)

**DECONTAMINATION PROCEDURE:**

Personnel: Flush exposed skin with soap and water.

**WORK LIMITATIONS:** (time of day, weather, heat/cold stress):

In high ambient temperatures, follow heat-stress precautions: Provide plenty of cool water and electrolytes (e.g. Gatorade), remove protective clothing during breaks; check resting pulse and increase number of breaks if pulse does not return to normal during work breaks.

In cold ambient temperatures (< 0 F.), follow hypothermia precautions.

Work may only progress during daylight hours or under conditions of adequate lighting.

**ELECTRICAL HAZARDS:**

Utilities located by N/A on N/A (date) before drilling.

Maintain at least 10 feet clearance from overhead power lines. If unavoidably close to overhead or buried power lines, turn power off and lockout circuit breaker. Avoid standing in water when operating electrical equipment.

**CONFINED SPACES:**

Monitor organic vapors and oxygen before entering. If following values are exceeded, do not enter:

- o Oxygen <20.0%
- o Total hydrocarbons >5 ppm above background, if all air contaminants have not been identified.
- o Concentrations of specific air contaminants exceeding action level in Section D, if all air contaminants have been identified.

If entering a confined space, monitor oxygen and organic vapors continuously.

**E. EMERGENCY INFORMATION**

**LOCAL TELEPHONE NUMBERS (provide area codes):**

Ambulance	<u>911</u>	
Hospital Emergency Room	<u>415/447-7000</u>	Valley Memorial Hospital
Poison Control Center	<u>911</u>	
Fire Department	<u>911</u>	(415/373-5450 non emergency)
Airport	<u>415/443-1600</u>	
Explosives Unit	<u>911</u>	
Police Department	<u>415/373-5303</u>	non emergency

Note: If you list 911, check to be sure it is activated in the site area, and determine whether or not it is enhanced.

**SITE RESOURCES:**

Water supply available on site:	Yes <u>X</u>	No <u>   </u>
Telephone available on site:	Yes <u>X</u>	No <u>   </u>
Bathrooms available on site:	Yes <u>X</u>	No <u>   </u>
Other resources available on site:	Yes <u>   </u>	No <u>X</u>

If yes, identify:

If you answered "no" to any of the above questions, identify the closest available facility, and provide directions.

**EMERGENCY CONTACTS**

**PHONE NO. (provide area codes)**

- |                               |                 |              |
|-------------------------------|-----------------|--------------|
| 1. Project Manager:           | Dale A. van Dam | 916/638-2085 |
| 2. Regional Manager:          | Brian Krugberg  | 916/638-2085 |
| 3. Health and Safety Officer: | Dale A. van Dam | 916/638-2085 |
| 4. Site Contact:              |                 | 415/443-7465 |
| 5. Regulatory Contact:        | Rafat A. Shahid | 415/271-4320 |
| 6.                            |                 |              |
| 7.                            |                 |              |
| 8.                            |                 |              |
| 9.                            |                 |              |
| 10.                           |                 |              |

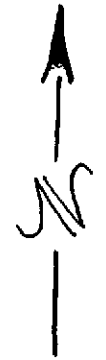
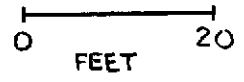
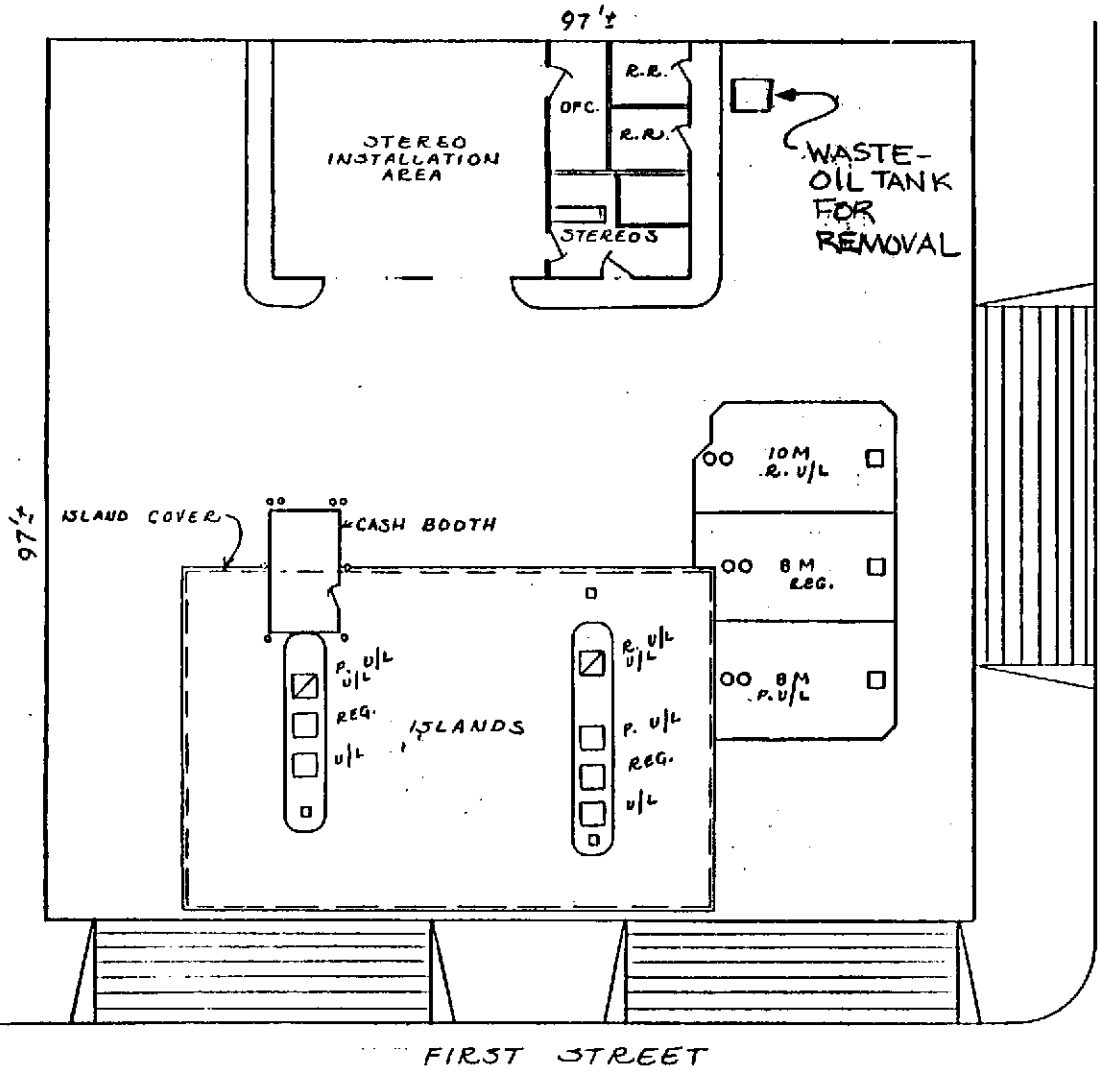
F. EMERGENCY ROUTES

(Give name, address, telephone number, directions, distance and time estimate, and map.)

HOSPITAL: Valley Memorial, 1111 East Stanley Blvd., 447-7000  
West on First Street, veer right, turn  
left on Stanley Blvd, immediate left into hospital.  
3 blocks away,  $\approx$  5 minutes

OTHER: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

G. SITE SKETCH



P STREET

FIRST STREET

<b>BEACON OIL COMPANY</b>		
525 WEST THIRD STREET, HANFORD, CALIFORNIA 93230		
SCALE	APPROVED BY:	DRAWN BY <b>MARTA</b>
DATE: <b>10/29/84</b>		REVISED
LOCATION: <b>1619 FIRST STREET LIVERMORE, CA</b>		
SITE PLAN		DRAWING NUMBER <b>604</b>

## HAZARDOUS PROPERTY INFORMATION

### Explanations and Footnotes

Water solubility is expressed in different terms in different references. Many references use the term "insoluble" for materials that will not readily mix with water, such as gasoline. However, most of these materials are water soluble at the part per million or part per billion level. Gasoline, for example, is insoluble in the gross sense, and will be found as a discreet layer on top of the ground water. But certain gasoline constituents, such as benzene, toluene, and xylene will also be found in solution in the ground water at the part per million or part per billion level.

- A. Water solubility expressed as 0.2g means 0.2 grams per 100 grams water at 20°C.
- B. Solubility of metals depends on the compound in which they are present.
- C. Several chlorinated hydrocarbons exhibit no flash point in conventional sense, but will burn in presence of high energy ignition source or will form explosive mixtures at temperatures above 200°F.
- D. Practically non-flammable under standard conditions.
- E. Expressed as mm Hg under standard conditions
- F. Explosive concentrations of airborne dust can occur in confined areas.
- G. Values for Threshold Limit Value - Time Weighted Average (TLV-TWA) are OSHA Permissible Exposure Limits except where noted in H and I.

H. TLV-TWA adopted by the American Conference of Governmental Industrial Hygienists, which is lower than the OSHA PEL.

I. TLV-TWA recommended by the National Institute for Occupational Safety and Health (NIOSH). A TLV or PEL has not been adopted by the ACGIH or OSHA.

- J. A - Corrosive
- B - Flammable
- C - Toxic
- D - Volatile
- E - Reactive
- F - Radioactive
- G - Carcinogen
- H - Infectious

K. Dermal Toxicity data is summarized in the following three categories:

- 1. Skin penetration
  - A - negligible penetration (solid-polar)
  - + B - slight penetration (solid-nonpolar)
  - ++ C - moderate penetration (liquid/solid-nonpolar)
  - +++ D - high penetration (gas/liquid nonpolar)



2. Systemic Potency

- E - slight hazard - LD<sub>50</sub> = 500 - 15,000 mg/kg  
Lethal dose for 70 kg man = 1 pint-1 quart
- F - moderate hazard - LD<sub>50</sub> = 50 - 15,000 mg/kg  
Lethal dose for 70 kg man = 1 ounce-1 pint
- G - extreme hazard - LD<sub>50</sub> = 50 - 15,000 mg/kg  
Lethal dose for 70 kg man = drops to 20 ml

3. Local Potency

- H - slight - reddening of skin
- I - moderate - irritation/inflammation of skin
- J - extreme - tissue destruction/necrosis

I. Acute Exposure Symptoms

- A - abdominal pain
- B - central nervous system depression
- C - comatose
- D - convulsions
- E - confusion
- F - dizziness
- G - diarrhea
- H - drowsiness
- I - eye irritation
- J - fever
- K - headache
- L - nausea
- M - respiratory system irritation
- N - skin irritation
- O - tremors
- P - unconsciousness
- Q - vomiting
- R - weakness



## ULTRAMAR INC.

525 WEST THIRD STREET, HANFORD, CALIFORNIA 93230 (209) 582-0241

October 16, 1989

Mr. Kerry Brenton  
D and B Construction  
2634 Pacer Lane  
San Jose, California 95111

**SUBJECT: TANK CLOSURE PLANS FOR BEACON STATION NO. 604, 1619 FIRST ST.,  
LIVERMORE, CALIFORNIA**

Dear Mr. Brenton:

Enclosed is one copy of the Alameda County tank closure application and three copies of the signature page. Please check that the information on the form, to the best of your knowledge, is correct. D & B needs to perform the following:

1. complete questions 19 and 21
2. sign the three signature pages
3. fill out the required workman's compensation form (prepared as required in section 3a on page 1 of the Alameda County February 1989 letter)
4. make three copies of the application (with original signatures page, plot plan, and safety plan, and workman's compensation form)
5. send the package of three copies, with the enclosed Beacon check for \$333, to Alameda County
6. upon approval of the application, follow items 4 through 7 on page 2 of the Alameda County February 1989 letter.

Please do not hesitate to call if you have any questions regarding this information.

Sincerely,

ULTRAMAR INC.

Glenn R. Dembroff  
Environmental Specialist

Enclosures

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