

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

September 1, 2006

Shelby Lathrop
ConocoPhillips
76 Broadway
Sacramento, CA 95818

Thomas and Celine Vadakkekunnel
4481 Peacock Court
Dublin, CA 94568

Subject: Fuel Leak Case No. RO0000436, Unocal #4186, 1771 First Street, Livermore, CA

Dear Ms. Lathrop and Mr. and Ms. Vadakkekunnel:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the documents entitled, "Work Plan - Additional Soil Boring Assessment," dated August 24, 2006 and "Quarterly Monitoring Report," dated April 17, 2006. The work plan, which was prepared on ConocoPhillips behalf by Delta Environmental Consultants, Inc., proposes three soil borings to delineate the vertical extent of contamination. However, the Work Plan proposes the borings in upgradient or cross gradient locations that do not appear to take into account the current extent of the plume, conceptual models of vertical plume migration, or results from the April 2006 soil borings, which provided significant information on site stratigraphy and contaminant distribution. Therefore, the Work Plan must be revised as discussed further in the technical comments below.

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

TECHNICAL COMMENTS

1. **Stratigraphy and Contaminant Distribution.** The April 2006 cone penetrometer borings and depth discrete groundwater sampling along with previous investigations at the site, have clearly shown that there are three coarse-grained water-bearing layers at the site. Dissolved phase hydrocarbons have been detected in each of the three water-bearing layers. Wells U-1, U-2, and U-3 monitor an upper silty sand with gravel layer that extends from ground surface to depths of approximately 20 to 25 feet bgs. The lower portions of the well screens for monitoring wells U-1, U-2, and U-3 are within a fine-grained unit that typically extends from the base of the silty sand with gravel to a depth of approximately 35 feet bgs. The "shallow" sparge points (SP-5s, SP-6s, SP-7s, and SP-8s) appear to be injecting ozone immediately below this upper silty sand with gravel layer; however, it is unclear how effective this treatment has been.

A silty sand to sand layer, typically extending from approximately 33 to 40 feet bgs, was encountered in all cone penetrometer borings at the site. Wells U-4, U-5, U-6, and U-7 are screened across this middle sand layer and the "lower" sparge points appear to be injecting ozone immediately below this silty sand to sand layer. It is also unclear how effective the treatment in the middle sand layer has been. Grab groundwater samples from this middle sand layer detected TPHg at concentrations up to 23,000 micrograms per liter ($\mu\text{g/L}$), MTBE at concentrations up to 1,100 $\mu\text{g/L}$, and TBA at concentrations up to 250 $\mu\text{g/L}$.

The lowermost sand and gravel layer extends from approximately 60 feet bgs to more than 70 feet bgs. Grab groundwater samples from this lowermost sand and gravel layer detected TPHg at concentrations up to 26,000 $\mu\text{g/L}$, MTBE at concentrations up to 630 $\mu\text{g/L}$, and TBA at concentrations up to 290 $\mu\text{g/L}$. No groundwater monitoring or remediation is currently conducted within this layer and the vertical extent of contamination below the lowermost samples collected from this layer is not known. Therefore, as previously requested, additional investigation is required to assess the vertical extent of contamination. Please see the technical comment below regarding proposed boring locations.

2. **Plume Stability.** The furthest downgradient monitoring well is well U-5. MTBE concentrations in well U-5 display an increasing trend over time. TPHg concentrations also appear to be increasing over time; however, there is significant variability in the results. The trend in TBA concentrations is unknown since TBA is not an analyte for quarterly groundwater sampling (please see technical comment 8 below regarding groundwater monitoring). No monitoring wells are installed within the lowermost sand and gravel layer; therefore, no data are available over time to indicate whether the plume is expanding. However, based on the apparent expansion of the plume within the middle sand layer and likely vertical migration, the plume within the lowermost sand and gravel layer may also be expanding.
3. **Upgradient Investigation.** Our previous June 22, 2006 correspondence included a comment requesting background as to why investigation was being proposed in the upgradient direction since the contamination observed on site was consistent with an on-site source. The response did not identify a potential upgradient source and indicated that historical records will be reviewed in the future. We have reviewed ACEH files and did not find potential off-site sources of fuel hydrocarbons upgradient of the site. The basis for proposed further investigation upgradient remains unclear. We do not concur with additional upgradient investigation until some justification is presented.
4. **Site History Review.** In our June 22, 2006 correspondence, we requested that you research the site history to evaluate whether historic releases have occurred and whether potential sources such as tanks, dispensers, and product lines were located in different areas of the site than their current locations. This information was to be used as a basis in planning additional investigation. The August 24, 2006 Work Plan proposes a historical review, apparently after additional investigation. Historical information is to be used in planning investigations rather than reviewed after investigation. Therefore, we concur with the proposal to review site history to identify recent or historical releases but request that this information be used in planning site investigation activities and presented in the revised Work Plan requested below. Please present plans for any additional investigation that may be necessary based on the review of site history in the revised Work Plan requested below.

5. **Proposed Boring Locations.** The three proposed boring locations, which are upgradient and crossgradient of the USTs and dispensers are not acceptable to define the vertical extent of contamination within the lower sand and gravel unit. Vertical plume migration occurs in the downgradient direction due to the downward vertical hydraulic gradient at the site and vertical dispersion. Additional investigation in the upgradient direction will not define the vertical extent of contamination. Therefore, we request that you review the site history, stratigraphy, hydrogeology, and contaminant distribution to propose more suitable soil boring locations. Based on plume expansion in the downgradient direction, one boring will be required in the area of well U-5.
6. **Geologic Cross Sections.** In order to better understand site stratigraphy and contaminant distribution, we request that the geologic cross sections that were provided in the "Soil Boring Assessment Report," dated May 26, 2006 be revised and expanded to incorporate monitoring wells and sparge points (including screen intervals), where groundwater was first encountered in borings and the static water levels, screen intervals for monitoring wells and grab groundwater samples, observations of free product, staining, or odor, and analytical results for soil and groundwater samples. In addition, the depth and thickness of soil layers shown on the cross sections do not appear to be consistent with the depth and thickness of soil layers on the cone penetrometer data (please review borings B-4 and B-5 in particular). Please present the updated cross sections in the revised Work Plan requested below.
7. **Review of Remedial System.** We concur with the proposed review of remediation system design. Please present the results of this review in the Soil and Groundwater Investigation Report requested below.
8. **Quarterly Groundwater Monitoring.** Please continue quarterly groundwater monitoring and present the results in the Quarterly Reports requested below. TBA has been detected in each of the water-bearing layers at the site. Please add fuel oxygenates as analytes for future groundwater sampling. The "Quarterly Report for First Quarter 2006" dated May 4, 2006 submitted to ACEH included only a Quarterly Summary Report and did not include the Quarterly Monitoring Report and Quarterly Remedial Performance Summary. Please submit the entire Quarterly Summary Report for First Quarter 2006 consolidated into one document similar to the "Quarterly Report for Fourth Quarter 2005" dated February 15, 2006. We note that the three components of the quarterly report are sometimes submitted as separate titled submittals on the Geotracker website. We request that you consolidate quarterly reporting into one document submitted both to the ACEH ftp site and Geotracker website to allow simplified access and tracking of submittals.

TECHNICAL REPORT REQUEST

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

- **September 15, 2006** – Quarterly Summary Report for Second Quarter 2006 (To include summary report, remedial performance summary, and quarterly monitoring report)

- **November 3, 2006 – Revised Work Plan**
- **December 8, 2006 – Quarterly Summary Report for Third Quarter 2006 (To include summary report, remedial performance summary, and quarterly monitoring report)**
- **120 days following ACEH approval of Work Plan – Soil and Groundwater Investigation Report**

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

ELECTRONIC SUBMITTAL OF REPORTS

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

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

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

Shelby Lathrop
Thomas and Celine Vadakkekunnel
September 1, 2006
Page 5

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

Daniel Davis, Delta Environmental Consultants, Inc., 3164 Gold Camp Drive, Suite 200
Rancho Cordova, CA 95670

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

Donna Drogos, ACEH
Don Hwang, ACEH
Jerry Wickham, ACEH
File

**Alameda County Environmental Cleanup
Oversight Programs
(LOP and SLIC)**

ISSUE DATE: July 2005

REVISION DATE: May 31, 2006

PREVIOUS REVISIONS: October 31, 2005,
December 16, 2005

SECTION: Miscellaneous Administrative Topics & Procedures

SUBJECT: Electronic Report Upload (ftp) Instructions

Effective January 31, 2006, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection.** (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in Excel format. These are for use by assigned Caseworker only.

Submission Instructions

- 1) Obtain User Name and Password:
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of: **ftp Site Coordinator.**
 - b) In the subject line of your request, be sure to include "ftp PASSWORD REQUEST" and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload.** (e.g., Subject: RO1234 Report Upload)

ALAMEDA COUNTY
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



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

June 22, 2006

Shelby Lathrop
ConocoPhillips
76 Broadway
Sacramento, CA 95818

Thomas and Celine Vadakkekunnel
4481 Peacock Court
Dublin, CA 94568

Subject: Fuel Leak Case No. RO0000436, Unocal #6034, 1771 First Street, Livermore, CA

Dear Ms. Lathrop and Mr. and Ms. Vadakkekunnel:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Soil Boring Assessment Report," dated May 26, 2006. The report, which was prepared on ConocoPhillips behalf by Delta Environmental Consultants, Inc., presents results from seven soil borings at the site. The "Soil Boring Assessment Report," concludes that groundwater in upper and lower water-bearing zones have been impacted by petroleum hydrocarbons and recommends the installation of two monitoring wells, continued ozone sparge remediation, and continued groundwater monitoring.

ACEH requests that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

- 1. Proposed Upgradient Monitoring Wells.** The "Soil Boring Assessment Report," recommends the installation of two upgradient monitoring wells to investigate possible off-site sources. We are not aware of potential off-site sources of fuel hydrocarbons in the upgradient direction. Please identify any possible sources of fuel hydrocarbons upgradient of the site and clarify the basis for additional investigation in the upgradient direction. In addition to testing the hypothesis that contamination is entering the site from an off-site source, we request that you also test the hypothesis that the contamination is from recent or historic releases from the site. Please research the site history to evaluate whether historic releases have occurred and whether potential sources such as tanks, dispensers, and product lines were located in different areas of the site than their current locations. Please also evaluate whether groundwater flow directions are or have been variable, historic water levels, and how the ozone sparging system may be affecting the observed distribution of dissolved phase hydrocarbons. Please present these results and plans to test these hypotheses in the Work Plan requested below.

2. **Vertical Extent of Contamination.** Fuel hydrocarbons were detected in each of the grab groundwater samples collected from the lower water-bearing zone. The highest concentration of total petroleum hydrocarbons in the gasoline range (26,000 micrograms per liter) was detected in grab groundwater sample B-7, which was collected from the lower water-bearing zone at 57 feet bgs. Coarse-grained soils were encountered to the total depth of the borings, which was up to 80 feet bgs. Due to the detection of elevated concentrations of dissolved fuel hydrocarbons in the deep water-bearing zone, we request that you conduct further assessment to define the vertical extent of contamination. Please consider the collection of grab groundwater samples below the depths where elevated concentrations of dissolved hydrocarbons were detected during the April 2006 investigation. A clay layer, which may represent a regional aquitard, has been encountered at depths of approximately 60 to 85 feet bgs at several fuel leak sites in the surrounding area of Livermore. We request that you advance a minimum of two borings to sufficient depths to evaluate whether the aquitard is present at the site. Please present plans to complete the definition of the vertical extent of contamination in the Work Plan requested below.
3. **Quarterly Groundwater Monitoring.** Please continue quarterly groundwater monitoring and present the results in the Quarterly Summary Reports requested below.

TECHNICAL REPORT REQUEST

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

- **August 15, 2006** – Quarterly Summary Report for Second Quarter 2006 (To include summary report, remedial performance summary, and quarterly monitoring report)
- **August 25, 2006** – Work Plan
- **November 15, 2006** – Quarterly Summary Report for Third Quarter 2006 (To include summary report, remedial performance summary, and quarterly monitoring 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.

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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.

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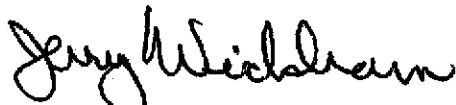
AGENCY OVERSIGHT

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Shelby Lathrop
Thomas and Celine Vadakkekunnel
June 22, 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

Daniel Davis, Delta Environmental Consultants, Inc., 3164 Gold Camp Drive, Suite 200
Rancho Cordova, CA 95670

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: June 5, 2005
	REVISION DATE: May 31, 2006
	PREVIOUS REVISIONS: October 31, 2005, December 16, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

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Additional Recommendations

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- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SEWT
01-17-06

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January 12, 2006

Shelby Lathrop
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4481 Peacock Court
Dublin, CA 94568

Subject: Fuel Leak Case No. RO0000436, Unocal #6034, 1771 First Street, Livermore, CA

Dear Ms. Lathrop and Mr. and Ms. Vadakkekunnel:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the document entitled, "Work Plan – Soil Boring Assessment," dated January 4, 2006. The Work Plan was prepared on ConocoPhillips behalf by Delta Environmental Consultants, Inc. The Work Plan proposes soil borings at seven locations to collect soil samples and depth-discrete grab groundwater samples to delineate the horizontal and vertical extent of contamination. ACEH concurs with the proposed scope of work provided that the technical comments below are addressed during the field investigation.

ACEH requests that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Intervals for Depth-Discrete Grab Groundwater Samples.** We concur with the proposed continuous CPT logging and proposed soil sampling to a depth of 60 feet bgs in the initial boring at each of the seven proposed boring locations. The CPT log and soil sample descriptions from the initial boring are to be used to select depth intervals for collection of grab groundwater samples in subsequent borings at each location. The Work Plan currently indicates that grab groundwater samples will be collected from depths of approximately 25 and 35 feet bgs. These estimated depths are generally acceptable (please see comment 2 regarding vertical extent); however, the depths must be adjusted as necessary to target saturated coarse-grained layers that represent potential contaminant migration pathways. The sand and gravel layer that is typically encountered at depths of approximately 33 to 40 feet bgs is to be a primary target for depth-discrete grab groundwater sampling.

The Work Plan currently indicates that all three soil borings at each proposed location will be extended to a depth of 60 feet bgs. As discussed above, the initial boring is to be extended to a depth of 60 feet bgs for logging purposes and soil sampling. Subsequent borings are to

be extended to the specific depths selected for collection of depth-discrete groundwater samples. Please present sampling results in the Soil and Groundwater Investigation Report requested below.

2. **Vertical Extent of Contamination.** The vertical extent of contamination has not been defined for the site. The Work Plan currently proposes the collection of grab groundwater samples at estimated depths of 25 and 35 feet bgs at each proposed boring location. As requested in our July 15, 2005 correspondence, soil and groundwater samples are to be collected below the sand and gravel layer that is typically encountered at depths of 33 to 40 feet bgs. Therefore, we request that one or more (to be based on number of separate coarse-grained layers encountered in the interval) grab groundwater samples be collected from coarse-grained layers within the interval from approximately 40 to 60 feet bgs at a minimum of two soil boring locations (proposed source area soil boring location and a minimum of one proposed downgradient location). Please present sampling results in the Soil and Groundwater Investigation Report requested below.
3. **Cross Sections.** The cross section (northwest-southeast orientation) previously provided in the August 25, 2005 Work Plan was helpful in interpretation of the hydrogeology of the site. Please include this cross section in future work plans or reports for the site. We recommend that you supplement the northwest-southeast-oriented cross section with a second cross section that is oriented in a northeast-southwest direction. The cross sections are to be available to field personnel for reference during the field investigation to help in the selection of depth intervals for grab groundwater sampling.
4. **Quarterly Reporting.** Three separate documents were submitted to report site activities during the third quarter of 2005 (Quarterly Summary Report, Quarterly Remedial Performance Summary, and Quarterly Monitoring Report). This resulted in seven separate titled submittals for the third quarter of 2005 on the Geotracker website. Please consider some consolidation of quarterly reporting to allow easier access and tracking of submittals. Wells U-3 and U-6 were sampled as part of the remedial performance monitoring on July 11, 2005 and September 13, 2005 and were sampled again on September 23, 2005 as part of the quarterly monitoring. You may wish to consider a reduced frequency of sampling for wells U-3 and U-6 to be more cost effective. However, the complete analytical results for wells U-3 and U-6 should be compiled on one table. Currently, remedial performance monitoring results do not appear on the Table 2 - "Historic Fluid Levels and Selected Analytical Results," in the Quarterly Monitoring Report. As an example, the analytical data from remedial performance sampling conducted at wells U-3 and U6 on July 11, 2005 and September 13, 2005 do not appear on Table 2 - "Historic Fluid Levels and Selected Analytical Results," in the Quarterly Monitoring Report. Please revise the table to include all data collected from each of the monitoring wells in the future quarterly reports requested below.

TECHNICAL REPORT REQUEST

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

- **February 15, 2006** – Quarterly Summary Report for First Quarter 2006 (To include summary report, remedial performance summary, and quarterly monitoring report)
- **May 15, 2006** – Quarterly Summary Report for First Quarter 2006 (To include summary report, remedial performance summary, and quarterly monitoring report)
- **May 24, 2006** – Soil And Groundwater Investigation Report

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

ELECTRONIC SUBMITTAL OF REPORTS

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

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

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

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

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: 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

Daniel Davis, Delta Environmental Consultants, Inc., 3164 Gold Camp Drive, Suite 200
Rancho Cordova, CA 95670

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
9-12-05

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

September 9, 2005

Shelby Lathrop
ConocoPhillips
76 Broadway
Sacramento, CA 95818

Subject: Fuel Leak Case No. RO0000436, Unocal #4186, 1771 First Street, Livermore, CA –
Work Plan Approval

Dear Ms. Lathrop:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the work plan entitled, "Revised Work Plan – Agency Response and Further Site Characterization Activity," dated August 12, 2005 prepared for the above referenced site on behalf of ConocoPhillips by ATC Associates, Inc. The Agency Response and Revised Work Plan address technical comments provided by ACEH in correspondence dated July 15, 2005. ACEH concurs with the Agency Response and Revised Work Plan provided that technical comment 1 below is addressed during the field investigation.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Soil Samples.** The Revised Work Plan indicates that soil samples will be logged continuously in the monitoring well borings and that a minimum of two soil samples will be collected for laboratory analysis from each boring. We request that soil samples be collected for laboratory analyses at all significant changes in soil type and at depths where staining, odor, or elevated photoionization detector (PID) readings are observed. Please implement this soil sampling protocol during the proposed field investigation and present the results in the Soil and Groundwater Investigation Report requested below.
- 2. Vertical Extent of Contamination.** The Revised Work Plan indicates that the boring for proposed monitoring well U-9 will be advanced to 45 feet below grade to sample soil below the deepest previous sampling interval. ACEH is concerned that advancing the boring for well U-9 to 45 feet below grade, which is only 5 feet deeper than contamination has already been detected, will not be sufficient to define the vertical extent of contamination. However, ACEH is willing to defer judgment on the need for soil and groundwater sampling at deeper intervals until the results of the currently proposed investigation are available.

TECHNICAL REPORT REQUEST

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

- **November 15, 2005** – Quarterly Monitoring Report for the Third Quarter 2005 and Evaluation of Remedial System Performance
- **January 31, 2006** – Soil and Groundwater Investigation Report
- **February 15, 2006** – Quarterly Monitoring Report for the Fourth Quarter 2005

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.

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: David Evans, ATC Associates, Inc., 6602 Owens Drive, Suite 100, Pleasanton, CA 94588

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

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

July 15, 2005

Shelby Lathrop
ConocoPhillips
76 Broadway
Sacramento, CA 95818

Thomas and Celine Vadakkekunnel
4481 Peacock Court
Dublin, CA 94568

Subject: Fuel Leak Case No. RO0000436, Unocal #4186, 1771 First Street, Livermore, CA

Dear Ms. Lathrop:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the documents entitled, "Work Plan - Site Assessment," dated May 23, 2005, and "Quarterly Summary Report - First Quarter 2005," dated April 29, 2005, both prepared for the above referenced site on behalf of ConocoPhillips by ATC Associates, Inc. The work plan proposed the installation of one monitoring well in a location that is upgradient from the USTs and dispensers. ACEH concurs with the installation of an upgradient well; however, please see the technical comments below regarding the proposed depth of the upgradient well. ACEH is concerned with the adequacy of the characterization of the lateral and vertical extent of contamination for the site and is requesting additional investigation as described in the technical comments below. Please submit a revised Work Plan that includes additional investigation to address the technical comments below. Based on staff review of the documents referenced above, we request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Site Background and Activity.** The Site Background and Activity section of the "Work Plan-Site Assessment," dated May 23, 2005 indicates that six soil samples were collected beneath the fuel dispensers and along the product delivery piping on June 6, 1996 during dispenser and piping replacement activities. Analytical results for the soil samples were reported as not detected. A soil gas survey conducted on September 10, 1997 found an area of elevated concentrations of petroleum hydrocarbons in soil vapor, localized around the UST complex. We do not have records in our files of further investigations, repairs, or removal of the USTs and associated piping. Please provide additional background information on the USTs and piping to document that the cause of elevated concentrations of petroleum hydrocarbons detected in soil vapor was located and repaired. This information is to be provided in the Revised Work Plan requested below.
2. **Lateral Extent of Contamination within Gravel Layer.** ACEH is concerned that the lateral extent of contamination within a sand and gravel layer that is typically encountered at depths

of 35 to 40 feet bgs has not been defined by the existing monitoring wells installed at the site. The layer is an approximately 5-foot thick layer consisting of gravel or sand with gravel; the top of the layer is observed in site borings at depths of approximately 34 to 37 feet bgs. This gravel layer is the uppermost coarse-grained layer that is fully submerged. The highest PID reading observed in boring U-3 was the lowermost soil sample collected within the gravel layer at approximately 38 feet bgs. A shallower sand layer that typically extends to a depth of approximately 24 feet bgs is above the water table or only the base of the layer is saturated.

Six ozone sparge points were installed at depths of 42 to 45 feet bgs, apparently to remediate this gravel layer typically encountered at depths of approximately 35 to 40 feet bgs. Monitoring wells U-6 and U-7, which are in cross gradient locations from the USTs, are the only monitoring wells at the site that appear to monitor the gravel layer. All remaining monitoring wells at the site are screened above the gravel layer, at depths less than 35 feet bgs. Therefore, the extent of groundwater contamination within this gravel layer zone has not been defined and the effectiveness of the remedial system is not being monitored within this layer. Additional investigation is required to define and monitor the lateral extent of contamination within this gravel layer. At a minimum, monitoring wells are to be installed within this sand and gravel layer near the locations of existing wells U-2, U-3, and U-5. The use of grab groundwater samples collected along transects oriented perpendicular to groundwater flow should be considered prior to installation of monitoring wells. Please include your plan to characterize the lateral extent of contamination within the Revised Work Plan requested below. Cross sections that show the relationship between site stratigraphy and existing and proposed sampling locations are required in the Revised Work Plan.

3. **Source Area Contamination.** Please use the information that will be provided in response to comment 1, to design and propose an investigation that will define the extent of soil contamination in the source area. Please include your proposal in the Revised Work Plan requested below.
4. **Vertical Extent of Contamination.** The vertical extent of contamination has not been defined for the site. The highest PID reading was observed in the lowermost soil sample collected in boring U-3. Please propose one additional soil boring or CPT boring within the source area to collect soil and groundwater samples beneath the sand and gravel layer typically encountered at depths of 35 to 40 feet bgs.
5. **Proposed Upgradient Monitoring Well.** The "Proposed Scope of Work," on Page 3 of the Work Plan indicates that one monitoring well will be installed to a depth of approximately 45 feet below ground surface (bgs). In contrast, the "Monitor Well Installation and Soil Sampling Procedures," on Page 4 indicates that the well screen will extend from approximately 25 to 35 feet bgs. Please clarify using a cross section in the Revised Work Plan requested below, the proposed target interval for the proposed upgradient well.
6. **Remedial System Performance.** The ozone injection system incurred a large amount of downtime during the first quarter of 2005. ACEH concurs that more frequent site visits are needed after the ozone sparge system is repaired. ACEH also concurs with the proposed engineering system review during the second quarter 2005.

TECHNICAL REPORT REQUEST

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

- **August 15, 2005** - Quarterly Monitoring Report for the Second Quarter 2005
- **August 30, 2005** – Revised Work Plan
- **November 15, 2005** - Quarterly Monitoring Report for the Third Quarter 2005
- **February 15, 2006** - Quarterly Monitoring Report for the Fourth Quarter 2005

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.

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.

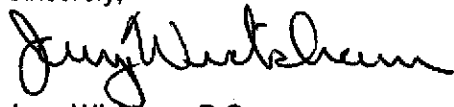
Shelby Lathrop
Thomas and Celine Vadakkekunnel
July 15, 2005
Page 4

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, P.G.
Hazardous Materials Specialist

cc: Shelby Lathrop
Shaw Environmental
4005 Port Chicago Highway
Concord, CA 94520

David Evans
ATC Associates, Inc.
6602 Owens Drive, Suite 100
Pleasanton, CA 94588

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 9-11-2000

R0436

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

StID 4121

September 6, 2000

Mr. Dave DeWitt
Tosco
2000 Crow Canyon Place, Suite 400
San Ramon, CA 94583

RE: **Workplan Approval for 1771 First Street, Livermore, CA**

Dear Mr. DeWitt:

I have completed review of Gettler-Ryan Inc.'s August 2000 *Work Plan for Monitoring Well Installation* prepared for the above referenced site. The proposal to install two off-site groundwater monitoring well across First Street is acceptable. Field work should commence within 90 days of the date of this letter. Please provide 72 hours advance notice of field activities.

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

eva chu
Hazardous Materials Specialist

c: Jed Douglas, G-R, 1364 North McDowell Blvd., Suite B2, Petaluma,
CA 94954-1116

SENT 7-13-2000

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

20436

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

StID 4121

July 12, 2000

Mr. Dave DeWitt
Tosco
2000 Crow Canyon Place, Suite 4000
San Ramon, CA 94583

RE: Monitoring Well Installation at 1771 First Street, Livermore, CA

Dear Mr. DeWitt:

I have completed review of Gettler-Ryan Inc.'s May 2000 *Site Conceptual Model (SCM) for Tosco (76) Service Station No. 4186* report prepared for the above referenced site. Based on the SCM, the site is assigned an investigation priority category of Class A. Class A requires the determination of cleanup priority as soon as possible.

Gettler Ryan proposed to install additional groundwater monitoring wells to delineate the lateral extent of hydrocarbons in groundwater. After further discussions with Mr. Jed Douglas, it was agreed that the additional groundwater monitoring wells should be installed offsite, across First Street. The wells will be screened from approximately 20 to 45 feet below ground surface or across the more permeable gravel lens at approximately 35 feet bgs. A formal workplan for the installation of the wells should be submitted for review. This letter is a tentative approval for the installation of two groundwater monitoring wells across First Street and west/northwest of the subject site. The workplan is due within 30 days of the date of this letter, or by **August 14, 2000**.

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

eva chu
Hazardous Materials Specialist

c: Jed Douglas, Gettler Ryan, 1364 North McDowell Blvd., Suite B2, Petaluma,
CA 94954-1116

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SNT 3-13-2000

R0436

StID 4121

March 13, 2000

Mr. David DeWitt
Tosco Marketing
2000 Crow Canyon, Suite 4000
San Ramon, CA 94583

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

**RE: Site Conceptual Model (SCM) for Tosco SS #4186, 1771 First Street,
Livermore, CA**

Dear Mr. DeWitt:

I have completed review of Gettler-Ryan Inc.'s February 2000 *First Quarter 2000 Groundwater Monitoring & Sampling Report* prepared for the above referenced site. That report summarized the groundwater monitoring event that took place on January 24, 2000. Groundwater from Well U-3, immediately downgradient of the UST complex, contained 42,000ppb MTBE (using Method 8260). It appears that the MTBE concentration in Well U-3 is exhibiting an increasing trend.

Impacted groundwater at this site is located above an aquifer that is a source of water supply for a community and may be within a 1000 feet radius of a drinking water well. At this time, a Site Conceptual Model (SCM) should be prepared for the site. Guidelines for the SCM preparation can be obtained from the SWRCB's *Draft Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenated*. I will send that document to you via e-mail. The SCM is due within 60 days of the date of this letter, or by **May 16, 2000**.

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

eva chu
Hazardous Materials Specialist

attachment via e-mail (dewittDB@aires.76products.com)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



11-290)

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

RO0000436

November 28, 2001

Mr. Dave DeWitt
Tosco
2000 Crow Canyon Pl, Suite 400
San Ramon, CA 94583

RE: Work Plan Approval for Tosco SS #4186, 1771 1st St., Livermore, CA

Dear Mr. DeWitt:

I have completed review of Gettler-Ryan Inc.'s November 2001 *Work Plan for Installation of Monitoring Wells and Ozone Microsparging System* that was prepared for the above referenced site. The proposal to install groundwater monitoring wells and sparge points at the site is acceptable.

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

A handwritten signature in black ink, appearing to read 'eva chu'.

eva chu
Hazardous Materials Specialist

email: Jed Douglas

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 436

StID 4121

Ms. Tina Berry
Tosco
P.O. Box 5155
San Ramon, CA 94583

ENVIRONMENTAL HEALTH SERVICES

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

RE: PSA for 1771 1st Street, Livermore, CA

Dear Ms. Berry:

I have reviewed Pacific Environmental Group, Inc's October 1997 Soil Gas Survey Results for the above referenced site. Soil gas vapors were collected from beneath the product dispensers and lines, and near the USTs. Laboratory analysis identified up to 4,500 ppb TPHg, 120 ppb benzene, and 8,000 ppb MtBE. It appears an unauthorized release of petroleum hydrocarbons may have occurred at the site. Therefore, further investigations are required to confirm the release, as well as to determine the lateral and vertical extent, and severity of soil and ground water contamination.

Such an investigation shall be in the form of a **Preliminary Site Assessment**, or PSA. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, and Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached Appendix A.

The PSA proposal is due **within 45 days** of the date of this letter. Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for RWQCB "sign off." All reports and proposals must be submitted under seal of a California Registered Geologist, Certified Engineering Geologist, or Registered Civil Engineer.

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

eva chu
Hazardous Materials Specialist

enclosure
toscol.1

**ALAMEDA COUNTY
HEALTH CARE SERVICES**



AGENCY

DAVID J. KEARS, Agency Director

R0436

① Globe Metals Co. @ 1820 10th St.
- Not in Envision
- In Geotracker: LUFT, OPEN
Lead: RW&CB
Local: ACEH

② BASF Corp. @ 1545 Willow St.
- Not in Envision
- In Geotracker: LUFT, CLOSED (11/4/94)
Lead: RW&CB

③ Encinal Marina @ 2051 Grand St.
- Not in Envision
- In Geotracker: SLIC, OPEN
Lead: RW&CB

④ Chevron @ 3340 1st St.: LUFT, OPEN
Lead: RW&CB

(18)
sion
250

November 29, 1995

Mr. Thomas A. Geisler
California R.W.Q.C.B.
2101 Webster St., Ste. 500
Oakland CA 94612

Re: Alameda County Health Agency Sites with Lead Agency as "LI" (Inactive).

⑤ East Bay Bmw e
3830 Old Santa Rita Rd
LUFT, OPEN
Lead: RW&CB
Local: ACEH

Dear Mr. Geisler:

OAKLAND		
(R0553) 7-Eleven	22350 Harrison St.	Not LOP
(R0650) Auto Service Station	9000 14th St. E.	#3232 (EC)
(R0306) BART	3924 Martin Luther King	#406 (EC)
(R0604) Cal East Foods	505 Cedar St.	#3971 (SH)
(R0847) Pressure Cast Co.	4201 14th St. E.	#101 (BC)
(R0847) Soc. of St. Vincent De Paul	9235 San Leandro St.	#4306 (EC)
(R0298) Unknown	1549 40th Ave.	Not LOP/No SLIC
(R0298) Unocal	3070 Fruitvale Ave.	Not LOP/Mod. closed
(R0298) BASF Corp.	1545 Willow St.	Not LOP, SLIC case, clsd 11/29/94
(R0116) Bramalea Pacific	1111 Broadway	#3664
(R0881) Kelley Auto Parts	4400 Telegraph Ave.	Not LOP. Removal ust
(R0585) R.D. Miner Co.	750 37th St.	Not LOP/No SLIC
(R0585) Huntington Labs	700 Kevin St.	#4418 (CL)
(R01060) Globe Metals Co.	1820 10th St.	Not LOP/SLIC case open
(R0405) Schaffer's Meat Co.	1110 98th Ave.	#3957 (EC)
(R0612) Chevron	3530 MacArthur Blvd.	#1042 (ML)
(R010) Right Parking	1225 Webster St.	#5284 (JE)
(R0145) Port of Oakland Bldg. C-01	2277 7th St.	#3899 (JE)
(R033) Auto Tech West	2703 Martin Luther King	#454 (JE)
(R0468) Port of Oakland trans Bay IT	707 Ferry St.	#3982 (JE)
(R0468) New Genico	3927 14th St. E.	#4610 (BC)
ALAMEDA		
Encinal Marina	2051 Grand St.	Not LOP
DUBLIN		
(R01069) Agorra Building Supply	5965 Dougherty Rd.	#4107 (EC)

LIVERMORE

Sweetwater Forest Fire Sta.	47405 Mines Rd.	Not LOP. Depref case open
Chevron	3360 1st St.	Not LOP. SLIC case open
(R0436) Unocal	1771 1st St. N.	Not LOP. Ust removal open

PLEASANTON

East Bay BMW	3830 Old Santa Rita Rd.	Not LOP/No SLIC
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Last column are site id numbers for LOP cases. These are not inactive. Please correct your records.
Thank you.

Sincerely,



Thomas Peacock
LOP Manager

TP/na

C: John Kaiser, R.W.Q.C.B.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0436

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 4121

January 14, 1994

Mr. Tony Quijalvo
UNOCAL
P.O.Box 5155
San Ramon, CA 94583

**Re: CLOSURE OF WASTE OIL UNDERGROUND STORAGE TANK at
1771 1st Street, Livermore, CA 94550**

Dear Mr. Quijalvo:

I have completed review of the analytical report concerning the removal of a waste oil underground storage tank on June 24, 1993 from the above referenced site. It is our opinion that this tank has been closed in compliance with Title 23 of the California Code of Regulations.

No further investigation or cleanup actions are required. Please be aware that further work may be required if conditions change or a water quality threat is discovered at this specific site.

If you have any further questions concerning this matter, please contact me at (510) 271-4530.

Sincerely,

eva chu
Hazardous Materials Specialist

cc: Bob Kezerian, KEI, 2401 Stanwell Dr., #400, Concord, 94520
files

unocall3

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0436

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

August 18, 1992

Ron Bock
UNOCAL
P.O. Box 5155
San Ramon, CA 94583

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, Alamada 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
DAVID J. KEARS AGENCY
[REDACTED] Agency Director



Department of Environmental Health
Hazardous Materials Program
30 Swan Way, Rm. 200
Oakland, CA 94621

RO436 (1)

XXXXXXXXXXXXXXXXXXXX
XXXXXXXXXXXXXXXXXXXX

(415)271-4320

January 17, 1989

Ms. Julie Bennie
Environmental Specialist
TransWorld Consortium, Inc.
123 Townsend St., Suite 610
San Francisco, CA 94107

Dear Ms. Bennie:

As requested, we have searched our files for any records we may have for the 1544 First St. site and vicinity in Livermore.

We find that we have no records of hazardous materials problems at the 1544 First St. site. However, we have located some information on nearby sites. This information is summarized below:

Chevron Station #92864 - 1334 - 1st Street

(R0850) Filed for permit for four (4) underground tanks, three (3) for gasoline and one (1) for motor oil, in February, 1988. The tanks were precision leak tested in July, 1988 and October, 1988 and all passed.

Grand Auto - 1511 - 1st Street

Business started in 1973 and stores used batteries and motor oil on premises. This office inspected the facility in May, 1986 and found no significant problems at that time.

Beacon Station #604 - 1619 - 1st Street

(R0434) Facility has five (5) underground tanks, four (4) for gasoline and one (1) for waste oil. Precision tests in May, 1988 and April, 1986, showed the tanks to be in good shape.

Tri-Valley Tune Up - 1737 - 1st Street

Business has been in operation since 1983, and generates waste oil, solvents and batteries, which a recycler picks up. This office inspected the facility in November, 1987 and found no significant problems at that time.

Ms. Julie Bennie
Environmental Specialist
TransWorld Consortium, Inc.
123 Townsend St., Suite 610
San Francisco, CA 94107
January 17, 1989
Page 2 of 2

Unocal Station #4186 - 1771 - 1st Street

(R0436) The facility has a permit for two (2) underground gasoline tanks which were installed in 1979. The tanks were leak tested in May, 1986 and April, 1988, and both passed on both occasions.

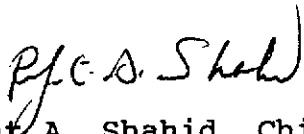
J. Cleaners - 2093 Railroad Ave.

(R02632) The dry cleaning shop has used solvents since 1985. An inspection conducted in November, 1987, revealed no significant problems.

This statement is limited to information available to this department and does not reflect other information which may be available from other agencies or parties.

If you have any questions, please contact Gil Wistar, Hazardous Materials Specialist, at 271-4320.

Sincerely,



Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:mnc

Enclosure (1)

cc: Gil Wistar, HMS
Files