

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

RO1165

March 14, 1994  
STID 3757

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

Bill Traverso  
United Glass  
477-25th St.  
Oakland CA 94612

Dear Mr. Traverso,

We have received the "Report of Soil and Ground Water Investigation," prepared by Century West Engineering, dated 2/14/94. As you know, this report documents the installation of one groundwater monitoring well situated approximately 10 feet south of the former UST.

This report documents 23,000 ppb TPH-gasoline in the well on 1/28/94. Groundwater sampling on a quarterly basis is recommended. We are in agreement with this recommendation, and therefore formally request quarterly groundwater sampling beginning 3 months from the first event (January 28). Please submit quarterly reports to this office within 6 weeks of groundwater sampling. Reports do not need to be copied to the RWQCB.

If you have any questions, please contact me at 510-271-4530. Please notify me at least 2 business days in advance of field activities so that I may arrange to be onsite.

Sincerely,

Jennifer Eberle  
Hazardous Materials Specialist

cc: Jim Gribi, Century West, 7950 Dublin Blvd., Suite 203,  
Dublin CA 94568  
Ed Howell/file

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ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



✓  
R01165

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

January 12, 1994  
STID 3757

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

Bill Traverso  
United Glass  
477-25th St.  
Oakland CA 94612

Dear Mr. Traverso,

We have received the "Workplan for Subsurface Investigation," prepared by Century West Engineering, dated 11/24/93. As you know, this workplan includes the installation of one groundwater monitoring well situated approximately 10 feet south of the former UST. The rationale for only one groundwater monitoring well is based on data gathered from at least three nearby sites. Groundwater flow direction at these sites is generally south. The closest site is Sears, located at 2630 Telegraph Ave.

During a telephone conversation between myself and Jim Gribi on 1/6/94, we agreed that soil would be sampled and analyzed at the capillary fringe. Three soil samples will be analyzed for TPH-gasoline and BTEX. With these understandings, this workplan is acceptable. Since no implementation schedule was included in the workplan, **we expect field work to begin within 30 days, or by February 12, 1994.** All soil and water residues generated from this project must be properly characterized and disposed. Legible and detailed disposal documentation must be submitted; this information will aid you later on re case closure.

If you have any questions, please contact me at 510-271-4530. Please notify me at least 2 business days in advance of field activities so that I may arrange to be onsite.

Sincerely,

Jennifer Eberle  
Hazardous Materials Specialist

cc: Jim Gribi, Century West, 7950 Dublin Blvd., Suite 203,  
Dublin CA 94568  
Ed Howell/file

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ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R01165

July 21, 1993  
STID 3757

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

Bill Traverso  
United Glass  
477-25th St.  
Oakland CA 94612

**NOTICE OF VIOLATION**

Dear Mr. Traverso,

This letter follows up our letter to you dated 10/8/92 (copy attached), requesting a workplan for a groundwater investigation by 11/18/92. During telephone conversations between us on 11/13/92 and 11/17/92, you requested an extension until 2/1/93, assuring me that monitoring well installation would be completed by the end of March 1993. The extension was granted.

Since we have not received any workplan or report from you, you are considered to be in violation of California Water Code Section 13267 (b) and 23 CCR Article 11, Section 2722 (c) and Section 2724. However, we continue to require a workplan for a groundwater investigation and will allow its submittal **within 30 more days, or by August 21, 1993**, submitted under cover letter from yourself, and prepared by a recognized professional as outlined below. The groundwater investigation should consist of a minimum of three monitoring wells in an equilateral triangular configuration to determine groundwater flow direction and to assess groundwater quality.

All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; and b) Article 11 of Title 23, California Code of Regulations. 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, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle  
Hazardous Materials Specialist

cc: Ed Howell/file

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ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R01165

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

October 8, 1992

STID 3757

United Glass  
477-25th St.  
Oakland CA 94612  
Attn: Bill Traverso

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

Dear Mr. Traverso,

We have received a package of information from your contractor, Scott Co. of California, on 10/5/92, which contains the following documents: Certificate of Remediation of Hydrocarbon Contaminated Soils from REMCO, Weighmaster Certificate for approximately 28 tons of soil, laboratory reports and chain of custody. Since the Certificate of Remediation of Hydrocarbon Contaminated Soils from REMCO was not signed, I telephoned REMCO to try to obtain a signed copy. Bob Jensen of REMCO indicated that there was no signed copy in their files; he faxed two receipts from Gibson Oil & Refining Co., Inc. in Bakersfield for approximately 38 tons of soil. I then telephoned Gibson Oil and was faxed a copy of their Certificate of Recycling, which states that 28.19 tons (of soil) from United Glass was received on 2/27/91 and was "properly and legally treated and recycled on 3/27/91." It therefore appears that the soil was properly disposed and documented.

To complete the paperwork required for this case, we need to receive an Underground Storage Tank Unauthorized Release (Leak)/Contamination Site Report from you or your representative. I have enclosed a copy for your convenience. This form is routinely filled out whenever there is a release from an underground storage tank (UST).

The only other issue that remains at this site is the potential impact to groundwater from the UST release. Concentrations as high as 1,500 parts per million (ppm) Total Petroleum Hydrocarbons as gasoline (TPH-g) were found in the soil during UST removal on 11/7/90. Water in the excavation pit contained concentrations as high as 13,000 parts per billion (ppb) TPH-g and 260 ppb benzene. A groundwater investigation is required by this agency to determine whether groundwater has been impacted. Therefore, we request that you submit a proposal for a groundwater investigation within 40 days, or by November 18, 1992. This is our second request for such a proposal. The first request by letter was dated 4/29/92; the proposal deadline was 6/13/92. Groundwater must be sampled for TPH-g and BTEX.

Bill Traverso  
STID 3757  
Page 2 of 2  
October 8, 1992

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; b) the State Water Resources Control Board LUFT Field Manual; and c) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. All reports and documents pertaining to this investigation should also be sent to:

Rich Hiett  
San Francisco Bay Region  
Regional Water Quality Control Board  
2101 Webster St., Ste 500  
Oakland CA 94612

If you have any questions, please contact me at 510-271-4530.

Sincerely,



Jennifer Eberle  
Hazardous Materials Specialist

cc: John Crinnion, Scott Co. of California, PO Box 12954,  
San Francisco CA 94604  
Rich Hiett, RWQCB  
Ed Howell/File

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ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R01165

RAFAT A. SHAHID, Assistant Agency Director

April 29, 1992

STID #3757

United Glass  
477-25th St.  
Oakland CA 94612  
Attn: Bill Traverso

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

Dear Mr. Traverso,

The case file for your site has recently been reviewed by our staff. The case has been reassigned to Jennifer Eberle, Hazardous Materials Specialist. Please mail future correspondence to her attention.

A 550-gallon gasoline underground storage tank (UST) was removed from the site on 11/7/90. Some holes were noted on the side of the UST. Soils and groundwater in the excavation pit were sampled. The composite soil from the stockpile contained 1,500 ppm TPH-g and 6.5 ppm benzene. The water from the pit contained 13,000 ppb TPH-g and 260 ppb benzene.

Alameda County's Department of Environmental Health, Division of Hazardous Materials currently runs the Local Oversight Program (LOP) for the cleanup and remediation of UST cases. This agency makes recommendations for case closures to the Regional Water Quality Control Board (RWQCB), which is the agency who makes the final determination on case closures.

According to RWQCB guidelines, the tank pit was subsequently over-excavated and soils were resampled. Laboratory results indicated TPH-g at concentrations of 0.92 and 1.0 ppm.

In addition, since high levels of contamination were found, a groundwater investigation must follow to ensure that the subsurface environment was not affected, as per RWQCB guidelines.

Therefore, we request that you submit a proposal for a subsurface investigation **within 45 days, or by June 13, 1992**. The groundwater investigation must include a minimum of 3 exploratory wells to identify groundwater gradient. Once the gradient is determined, you must install one groundwater monitoring well within 10 feet downgradient of the former UST. Groundwater must be sampled for TPH-d and BTEX lead for at least 4 quarters. Site closure is based on four consecutive quarters of non-detectable concentrations in groundwater. Therefore, additional sampling may be necessary.

Bill Traverso  
STID #3757  
Page 2 of 2  
April 29, 1992

All work must be performed according to the Leaking Underground Fuel Tank Field Manual, (LUFT Manual), revised 10/89, and the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Storage Tank Sites, revised 8/10/90, as summarized in Appendix A.

Copies of these documents can be obtained by calling the SFRWQCB data management group at 510-464-1269.

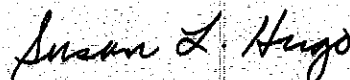
All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. All proposal, reports, and analytical results pertaining to this investigation and remediation must be sent to our office and to:

Rich Hiatt  
RWQCB, San Francisco Bay Region  
2101 Webster St., Suite 500  
Oakland CA 94612

Lastly, Ms. Eberle of our staff spoke with Paul Ferreira of Scott Co. on 4/29/92. Mr. Ferreira indicated that the stockpiled soils were removed and disposed. Please provide this office with documentation of removal and disposal.

If you have any questions, please phone Jennifer Eberle at 510-271-4320.

Sincerely,



Susan Hugo  
Senior Hazardous Materials Specialist

cc: Rich Hiatt, RWQCB  
Paul Ferreira, (Scott Co., 1919 Market St., PO Box 12954,  
Oakland CA 94604)

File

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ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R01165

Certified Mail # P 062 128 298

November 28, 1990

Mr. W.V. Traverso  
United Glass Co.  
477 25th Street  
Oakland, CA 94612

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

**RE: Site Remediation at United Glass, 477 25th Street, Oakland  
94612**

Dear Mr. Traverso,

This letter is in response to some preliminary data received by this office from Mr. Jay Groh with Scott Co. on November 27, 1990. The data received were from soil sampling performed by West Environmental Science & Technology when the underground tank was removed on November 7, 1990.

The laboratory results indicated contamination levels of the soil in the bottom of the excavation and in the stockpiled soil which were above 100 parts per million (ppm). According to a Regional Water Quality Control Board guidance document referred to as the Tri-Regional Recommendations; dated August 1990, when contamination levels exceeding 100 ppm of Total Petroleum Hydrocarbon or Oil and Grease are encountered, a groundwater investigation must be conducted to determine whether groundwater has been impacted.

A groundwater sample was taken when groundwater was encountered at the time of the excavation. This sample also showed contamination levels of 13,000 parts per billion (ppb) for Total Petroleum Hydrocarbons indicating that some impact to groundwater has already occurred.

Based upon the above preliminary information available you are required to provide this office with a proposal to investigate the extent of subsurface contamination and to effectively remove the contamination at the above site. Enclosed is an outline describing the type of information requested. It should be used as a guideline for a qualified professional to prepare a workplan for your particular situation.

To assess site contamination, we require that you submit a work plan which, at a minimum, addresses the items listed below and presents a timetable for their completion. Please submit this work plan within 45 days of the date of this letter.

Our office will be the lead agency overseeing the investigation of this site. The San Francisco Bay Regional Water Quality Control Board (SFRWQCB) is currently unable to oversee the large number of underground tank cases within Alameda County and has delegated the handling of this case to our Division. We will be in contact with the SFRWQCB in order to provide you with guidance concerning the



Page 2 of 7  
Mr. Traverso  
November 28, 1990

All work must be performed according to the following SFRWQCB documents:

- \* Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks, 10 August 1990; and
- \* Appendix A for above, 1 July 1988, revised 3 April 1989.

Copies of these documents can be obtained by calling the SFRWQCB data management group at 464-1269. Please note the LUFT manual as a whole has not been adopted by the SFRWQCB.

Items to Address:

**\_. Site history.**

- A. This shall include historic site use and ownership information, a description of the types and locations of any hazardous materials used on site, and a description of any known hazardous materials spills, leaks or accidents.
- B. For each existing and former underground tank on site, include the following information:
  - a) the date of tank installation;
  - b) the tank capacity and construction material;
  - c) the types of materials stored in the tank;
  - d) the dates the tank was used;
  - e) a discussion of tank inventory reconciliation/monitoring methods and results;
  - f) tank testing dates and results;
  - g) estimate of quantity of product lost, if applicable;
  - h) the date of tank and piping removal;
  - i) the tank and piping condition at the time of removal;
  - j) observations made at the time of tank and piping removal (e.g. the tank depth, a log of the stratigraphic units encountered within the excavation, ground water depth, descriptions and locations of stained or odor-bearing soil, descriptions of any free product or sheen observed on ground water, etc.);
  - k) a map showing the locations of soil and ground water samples collected during tank removal, along with chain of custody records and laboratory data sheets;
  - l) descriptions of any remedial measures conducted at the time of tank removal;

Page 3 of 7  
Mr. Traverso  
November 28, 1990

- m) copies of the TSDF to Generator manifests for all hazardous wastes removed - including liquids, residual sludges, soil and the tank and piping; and
- n) any other observations.

**\_. Site Description.**

This shall incorporate the following information:

- A. A map which shows streets, site buildings, underground tank locations, tank islands and pipings, subsurface conduits and utilities, on-site and nearby wells, and nearby streams or water bodies.
- B. A description of the hydrogeologic setting of the site and surrounding area. Include a description of any subsurface work previously done at the site or on adjacent sites.

**\_. Determination of the vertical and lateral extent of soil contamination.**

This shall describe the method by which the contaminated soil extent will be determined.

- A. If a soil gas survey is planned, the location of survey points must be identified along with the analytical methods and techniques to be used. A quality assurance plan for field analyses must be submitted.
- B. If soil samples are to be collected for contamination delineation, consult the SFRWQCB guidelines and the LUFT manual for soil sampling protocols. During drilling of all boreholes and monitoring wells, undisturbed soil samples are to be collected at a minimum of every five feet in the unsaturated zone and at any changes in lithology for logging and analytical purposes. Borings and wells are to be permitted through Alameda County Flood Control and Water Conservation District, Zone 7. Borings and wells shall be logged from undisturbed soil samples. Logs shall include observed soil odors; blow counts shall be expressed in blows per 6 inches of drive.

No sample compositing is to be done in the field. Should composite analysis be desired, discrete samples are to be collected and taken to a California State Certified Laboratory for compositing. If composite sample analysis is done, discrete samples may later need to be collected and analyzed dependent upon analytical results. Composite sample analytical results will be interpreted by multiplying each analytical result by the number of discrete soil samples in the composite and comparing the resulting value with relevant contaminant limits. If a composite sample has no detectable analytes, the analytical method detection limit will be multiplied by

Page 4 of 7  
Mr. Traverso  
November 28, 1990

the number of samples in the composite. The resulting value will then be compared with relevant contaminant limits.

C. Soil samples must be analyzed by a California State Certified Laboratory for the appropriate constituents (see Attachment 1, Table 2, 2 June 1988 SFRWQCB document).

\_. **Sampling and remediation or disposal of stockpiled fill and soil.**

The stockpiled soil must be sampled and either disposed of or remediated. The number of samples collected from the stockpile(s) must be adequate to characterize the soil for the soil handling method.

\_. **Determination of Ground Water Quality.**

Due to the potential that fuel may have already contaminated the ground water, water quality must be characterized.

A. A minimum of three monitoring wells must be installed to determine the ground water gradient. One monitoring well must be installed within 10 feet of the tank in the down-gradient direction. If the verified down-gradient location has been established, then complete gradient data must be submitted and only one monitoring well must be installed; this well must be within 10 feet of the tank in the down-gradient direction.

B. Monitoring wells shall be designed and constructed to be consistent with the SFRWQCB guidelines and to permit entrance of any free product into the wells. Filter pack and slot sizes for all wells should be based on particle analysis (ASTM D-422) from each stratigraphic unit in at least one boring on the site and on the types of ground water contaminants present. The well screen must be situated to intercept any floating product from both the highest and lowest ground water levels. All wells shall be surveyed to mean sea level to an established benchmark to 0.01 foot.

C. Monitoring wells must be sampled. Water level and free product thickness measurements shall be made in all wells before sampling is begun. Measurement of free product must be done by an optical probe or other method having equal accuracy.

or

C. Monitoring wells must be sampled for dissolved and floating constituents.

Measure free product thicknesses and water levels in all wells weekly for one month. Free product measurements

Page 5 of 7  
Mr. Traverso  
November 28, 1990

must be made with an optical probe or by another method shown to have equivalent accuracy.

A ground water gradient map shall be developed for every water level data set. If the gradient fluctuates, water level measurements must continue to be made monthly until a gradient pattern is established. Fluctuations in ground water levels due to tidal action must also be documented.

Sample monitoring wells monthly for three consecutive months. Free product thicknesses and water levels shall be measured in all wells for each sampling event **before any purging or sampling activities are begun.**

After three consecutive months of sampling, all monitoring wells must be sampled at least quarterly for one year.

D. Ground water samples are to be analyzed by a California State Certified Laboratory for the appropriate constituents (see Attachment 1).

E. Ground water levels and quality must be monitored quarterly for a minimum of one year, even if no contamination is identified.

**\_. Site Safety Plan.**

**\_. Interpretation of hydrogeologic data.**

Water level contour maps showing ground water gradient direction, and free and dissolved product plume definition maps of each contaminant constituent should be prepared routinely and submitted with other sampling results in a technical report.

**\_. Reporting.**

A. A technical report must be submitted by February 28, 1991 which presents and interprets the information generated during the initial subsurface site investigation. At a minimum, the report must include the following items:

- \* site history information;
- \* boring and well construction logs;
- \* records of field observations and data;
- \* chain-of-custody forms;
- \* water level data;
- \* water level contour map showing ground water gradient direction;
- \* contaminant plume maps;
- \* tabulations of soil and ground water contaminant concentrations;
- \* status of soil contamination characterization;
- \* description of any remedial work performed;

Page 6 of 7  
Mr. Traverso  
November 28, 1990

- \* laboratory-originated analytical results for all soil and ground water samples collected;
- \* copies of TSDF to Generator manifests for any hazardous wastes hauled off site; and
- \* any recommendations for additional investigative or remedial work.

or

- A. Monthly reports must be submitted for the next three months with the first report due February 28, 1991. These reports should include, at a minimum, results of water level and water quality sampling, gradient determination and gradient maps, and contamination plume maps.
- A'. Quarterly reports must be submitted beginning February 28, 1991 these reports should describe the status of the investigation and should include the following:
- \* Details and results of all work performed during the quarter (e.g. records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory-originated analytical results for all samples collected, tabulations of soil and ground water contaminant concentrations, descriptions of any remedial work performed, tabulations of free product thicknesses, etc.)
  - \* Status of soil contamination characterization
  - \* Status of ground water contamination characterization
  - \* Interpretation of the results (e.g. water level contour maps showing ground water gradient direction, free and dissolved product plume definition maps of each constituent, tidal effects, etc.)
  - \* Any recommendations or plans for additional investigative work or remediation
  - \* Copies of TSDF to Generator manifests for any hazardous wastes hauled off site
- B. All reports and proposals must be signed by a California-Certified Engineering Geologist, California-Registered Geologist or a California-Registered Civil Engineer (see page 2, 2 June 1988 SFRWQCB document). A statement of qualifications for each lead professional should be included in all workplans and reports.
- C. Each/The technical report should be submitted with a cover letter from United Glass Co. and received in this office by the established due date. The letter must be signed by a principal executive officer or by an authorized representative of that person.

Page 7 of 7  
Mr. Traverso  
November 28, 1990

Enclosed is an "Underground Storage Tank Unauthorized Release (Leak)/Contamination Site Report" form which must be completed and returned within five working days. Please send the entire completed form to our office.

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and to:

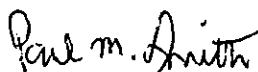
Lester Feldman  
Regional Water Quality Control Board, San Francisco Bay Region  
1800 Harrison Street, Suite 700  
Oakland, California 94612  
(415) 464-1255

You should be aware that this Division is working in conjunction with the SFRWQCB and that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b).

Any extensions of agreed-upon time deadlines must be confirmed in writing by either this Division or the SFRWQCB.

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

Sincerely,



Paul M. Smith,  
Hazardous Materials Specialist

attachments (1)

cc: Gil Jensen, Alameda County District Attorney's Office of  
Consumer and Environmental Protection  
Lester Feldman, Regional Water Quality Control Board,  
San Francisco Bay Region  
Howard Hatayama, State Department of Health Services  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Rafat A. Shahid, Asst. Agency Director, Alameda County  
Environmental Health  
Jay Groh, Scott Co.  
Files

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ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R01165

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

May 17, 1990

Mr. W.V. Traverso  
United Glass Co.  
477 25th Street  
Oakland, CA 94612

Dear Mr. Traverso,

This is a follow up letter to the phone conversation which you had on May 11, 1990 with Paul Smith, Hazardous Materials Specialist, with our department.

It is noted that on November 10, 1988 you were issued a 6 month interim status permit for an underground storage tank located at your facility. The permit expired May 11, 1989. It is our understanding that you no longer plan to use this underground tank. Title 23, Section 2670 (c) of the CA Code of Regulations requires that underground tanks in which the storage of hazardous substances has ceased and where the owner or operator has no intent within the next 2 years to use the underground storage tank for the storage of hazardous substances shall be removed.

We request that you submit the underground tank closure forms which were supplied to you last week or to comply with the 5 year permit criteria such as an annual tank integrity test and implementation of a monitoring plan including quarterly monitoring reports to this office.

Please respond to this office within 30 days of the receipt of this letter with a decision as to which option you choose regarding the underground storage tank. If you have any questions please direct them to Paul Smith at 271-4320.

Sincerely,

Edgar B. Howell III, Chief,  
Hazardous Materials Division

EBH:PMS:pms  
Enclosures (1)

cc: Gil Jensen, Alameda County District Attorney Office of  
Environmental and Consumer Protection Agency