

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SOVT
01-19-06

January 19, 2006

Mr. Roger Woodward
RL Woodward Industries
P.O. Box 2688
Dublin, CA 94568

Mr. Kewal Singh
Corwood Carwash
6973 Village Parkway
Dublin, CA 94568

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

Dear Messrs. Woodward and Singh:

Subject: Fuel Leak Site, RO0002432, Corwood Carwash, 6973 Village Parkway, Dublin, CA, 94568

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including the January 7, 2005 Revised SWI Workplan prepared by Gribi Associates. This work plan responds to the County's previous May 15, 2004 letter requesting additional information and sampling. The work plan also includes a conduit/well survey and a descriptive site conceptual model along with the revised work plan. The work plan proposes seven boring locations for the sampling of depth discrete soil and groundwater samples, with the intention to verify the three dimensional distribution of residual hydrocarbon contamination and ultimately obtain site closure. We request that you address the following technical comments when performing the proposed work and submit the technical report requested below.

TECHNICAL COMMENTS

1. Source area characterization- The lateral and vertical extent of contamination in soil and groundwater in the source areas has not yet been determined and is not addressed in the submitted work plan. Therefore, we request additional borings within and up-gradient of the dispenser areas to complete source area characterization. This work will either confirm or refute the assumption of the proposed SCM that the source is a "small area associated with the east fuel dispenser".
2. Plume characterization- Based upon groundwater gradient from previous monitoring, it appears that the groundwater flow is south-southeasterly. Therefore, we request that an additional boring be advanced immediately down-gradient of the former west dispenser, where residual contamination was detected.

The pattern of the proposed borings immediately down-gradient of the car wash building does not represent a realistic expectation of the plume shape and does not incorporate the previous investigation results. In the absence of preferential pathways, the plume is expected to migrate laterally in the direction of groundwater flow. The proposed borings #2,4,5 & 6 appear to be at the fringes of the anticipated

plume and would not allow significant refinement of the plume's dimension. The plume is more likely located between the east-west boundaries' of the car wash, therefore, borings would be better located between IB-3 and IB-4 and between IB-3 and boring 4. The need, the number and locations of the southernmost borings, proposed on the Midas Muffler property should reflect what is found in the borings along the southern property boundary and should be a part of the dynamic expedited site assessment. The goal is to provide both a planar and cross-section representation of the plume in your final report.

3. Soil and Groundwater Sampling and Analysis- The borings are proposed to be drilled to a depth of 50' and is based upon the presence of a shallow water bearing zone above 20' and the absence of multiple water bearings below this depth. If specific water bearing zones are identified during logging, groundwater samples will be collected from an adjacent borehole from the noted intervals. Soil samples will be analyzed based upon screening results ie odor, staining or elevated instrument readings and from locations of obvious lithologic change. In addition to the proposed parameters, TPHg, BTEX, oxygenates and lead scavengers, we request that TPHd be also run on the soil and groundwater samples.

TECHNICAL REPORT REQUEST

- January 31, 2006- Revised boring location figure (e mail).
- April 20, 2006- Soil and Groundwater Investigation Report
- April 20, 2006- Groundwater sampling report for MW-1

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 barney.chan@acgov.org.

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

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


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.

Messrs. Woodward and Singh
January 19, 2006
Page 4 of 4

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos

Mr. James Gribi, Gribi Associates, 1090 Adams St., Ste. K, Benicia, CA 94510
Matt Katen, Zone 7 Water Agency

1_18_06 6973 Village Parkway

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



May 14, 2004

Mr. Roger Woodward
RL Woodward Industries
P.O. Box 2688
Dublin, CA 94568

Mr. Kewal Singh
Corwood Carwash
6973 Village Parkway
Dublin, CA 94568

ENVIRONMENTAL HEALTH SERVICES

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

Subject: RO 2432, Corwood Carwash, 6873 Village Parkway, Dublin, CA

Dear Messrs. Woodward and Singh:

Alameda County Department of Environmental Health (ACDEH) staff has received the "Work Plan to Conduct Additional Site Characterization Activities," dated July 16, 2003, prepared by Gribi Associates (Gribi) and transmitted via facsimile on July 17, 2003. We have examined the technical elements of the work plan and determined that it failed to comply with the scope of work requested in the ACDEH correspondence dated January 31, 2003. Consequently, the July 16, 2003 Gribi work plan has been rejected, as outlined, below.

At this time we request that you prepare and submit, by June 15, 2004, an acceptable SWI work plan that complies with the tasks outlined in the January 31, 2003 ACDEH correspondence, and each of the following comments.

WORK PLAN DEFICIENCIES

Following are examples of deficiencies in Gribi's "Work Plan to Conduct Additional Site Characterization Activities," dated July 16, 2003, that render this work plan unacceptable. These deficiencies are substantial enough to cause ACDEH to reject the work plan.

- 1) **Site Conceptual Model** – An SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point the SCM is considered "validated". The validated SCM forms the foundation for developing the most cost-effective final Corrective Action Plan (CAP).

Messrs. Woodward and Singh
Re: Corwood Carwash, 6873 Village Parkway, Dublin
May 15, 2004
Page 2 of 4

The referenced January 31, 2003 ACDEH correspondence specifically requested that a Site Conceptual Model (SCM) be developed for this site. The scope of work presented in the Soil and Water Investigation (SWI) work plan was to be substantially based on the SCM and results of a conduit/preferential pathway study, an element of the SCM. Completion of the conduit/preferential pathway study was also requested by ACDEH in the referenced correspondence.

Neither an SCM nor conduit/preferential pathway study was presented in the Gribi work plan. We presume that the conduit/preferential pathway study was not completed, as no reference to such a study was made in the work plan. Hence, the work plan failed to satisfy the critical task of evaluating the SCM before scoping of the pending SWI.

- 2) **Soil Borings** – The intent of the SWI work plan was to provide a *three-dimensional* assessment of impacts, including the demarcation of potential geogenic and anthropogenic flow pathways and their consequent contribution to the preferential migration of pollutants from the source area, and to further the refinement of the SCM. The Gribi work plan proposes the emplacement of just two (2) soil borings. Boring locations appear to be arbitrary, however, as no justification for their locations is presented. Further, no discussion of the SCM or conduit/preferential pathway study is provided.

The scope of the Gribi work plan fails to provide a comprehensive approach that is consistent with the technical elements now dictated by the technical guidance now available from the scientific community and petroleum industry think tanks to aid the investigation of fuels containing oxygenates, e.g., MtBE. The current state of the art requires, among numerous other components, that oxygenate investigations include transects of continuously cored sampling points from which depth-discrete soil and water samples are collected

CONCLUSION

In summary, the Gribi work plan did not comply with the fundamental requests made in the January 31, 2003 ACDEH correspondence. The work plan did not reflect the current technical approach now accepted as appropriate for the investigation of fuels containing oxygenates. Further, the work plan was not presented under cover, signed under penalty of perjury, by the Responsible Party(ies) who have taken a lead role in compliance with corrective action directives.

Your attention is directed to the document entitled "*Strategies for Characterizing Subsurface Releases of Gasoline Containing MtBE*", American Petroleum Institute Publication No. 4699, dated February 2000, and to the State Water Resources Control Board (SWRCB) "*Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Final Draft*", dated March 27, 2000 to assist in development of your SCM and scoping an appropriate investigation. In addition, technical protocol for expedited site assessments are provide in the US EPA "*Expedited Site Assessment Tools for Underground Storage Tank Sites: A guide for Regulators*" (EPA 510-B-97-001), dated March 1997.

Messrs. Woodward and Singh
Re: Corwood Carwash, 6873 Village Parkway, Dublin
May 15, 2004
Page 3 of 4

TECHINCAL REPORT REQUEST

Please submit technical reports according to, or otherwise comply with, the following schedule:

June 15, 2003 – Work plan for Soil and Water Investigation

60 Days from SWI Work Plan Approval – Soil and Water Investigation Report (which contains the results of the SWI assessment work, and a proposal for additional work, as needed, to refine the SCM)

These reports and work plans are being requested pursuant to the Regional Board's authority under Section 13267(b) of the California Water Code. **Each technical report shall include conclusions and recommendations for the next phases of work required at the site should more appear necessary to refine the SCM.** We request that all required work be performed in a prompt and timely manner, as suggested by the noted schedule, above. Revisions to this schedule shall be requested in writing with appropriate justification for anticipated delays.

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that all work plans and technical reports containing professional geologic or engineering evaluations and/or judgments be completed under the direction of an appropriately-registered or certified professional. This registered or certified professional shall sign and wet stamp all such reports and work plans.

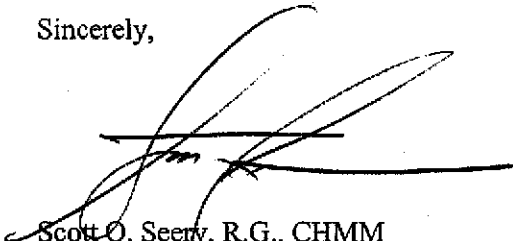
All reports and work plans are to be submitted under cover, signed under penalty of perjury, by the Responsible Party(ies) who have taken a lead role in compliance with corrective action directives.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will refer your case to the County District Attorney, for enforcement follow up. Enforcement follow up may include administrative action or monetary penalties of up to \$10,000 per day for each day of violation of the California Health and Safety Code, Division 20, Chapter 6.75.

If you have any questions please call Mr. Scott Seery at (510) 567-6783.

Sincerely,



Scott O. Seery, R.G., CHMM
Hazardous Materials Specialist

Messrs. Woodward and Singh
Re: Corwood Carwash, 6873 Village Parkway, Dublin
May 15, 2004
Page 4 of 4

c: Betty Graham, RWQCB
Dave Charter, SWRCB UST Fund
Matt Katen, Zone 7 Water Agency
James Gribi, Gribi Assoc., 1350 Hayes St., Ste. C-14, Benicia, CA 94510
Christine Noma, Wendel Rosen Black & Dean
1111 Broadway, 24th Fl., Oakland, CA 94607

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

RO0002432

June 17, 2003

Mr. Roger Woodward
RL Woodward Industries
P.O. Box 2688
Dublin, CA 94568

Mr. Kewal Singh
Corwood Carwash
6973 Village Parkway
Dublin, CA 94568

NOTICE OF VIOLATION

RE: SWI for Corwood Carwash, 6973 Village Parkway, Dublin, CA

Dear Messrs. Woodward and Singh:

In correspondence from this office dated January 31, 2003, you were directed to submit a Soil and Water Investigation (SWI) workplan within 45 days, or by March 17, 2003. To date, the referenced SWI work plan has not been received. We are in receipt, however, of the March 7, 2003 Gribi Associates groundwater monitoring report in which regulatory case closure was, again, requested for this case. As articulated in the cited January 31, 2003 correspondence, further assessment of MtBE impacts is required before case closure will be considered.

You are currently in violation of California Water Code Sec. 13267(b) and provisions of Article 11, Title 23, California Code of Regulations for failure to submit the requested SWI workplan. California Health and Safety Code Sec. 25299 provides for civil penalties of up to \$5000 per day, per violation, for violations of this sort. In addition, failure to comply with directives from this office may result in your ineligibility to receive funding through the State Water Resources Control Board (SWRCB) Underground Storage Tank Trust Fund.

At this time, you are directed to submit the subject SWI workplan no later than July 17, 2003. Failure to do so will result in this case being referred to the Alameda County District Attorney's Office for potential enforcement action.

Please be advised that this decision is subject to appeal to the State Water Resources Control Board (SWRCB), pursuant to Sections 25296.40, 25297.1, and 25299.39.2 of the California Health & Safety Code. Please contact the SWRCB Underground Storage Tank Program at (916) 341-5851 for information regarding the appeal process. Petitions must be filed within 30 days from the date of this letter.

If you have any questions, I can be reached at (510) 567-6783.

Sincerely,



Scott O. Seery, R.G., CHMM
Hazardous Materials Specialist

Messrs. Woodward and Singh
Re: 6973 Village Parkway, Dublin
June 17, 2003
Page 2 of 2

c: Betty Graham, RWQCB
Shari Knieriem, SWRCB UST Fund
Matt Katen, Zone 7 Water Agency
D. Drogos, R. Weston

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



06-11-02

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

RO0002432

June 10, 2002

Mr. Roger Woodward
RL Woodward Industries, Inc
P.O. Box 2688
Dublin, CA 94568

**SUBJECT: INTENT TO MAKE A DETERMINATION THAT NO FURTHER ACTION IS
REQUIRED OR ISSUE A CLOSURE LETTER FOR 6973 VILLAGE PARKWAY, DUBLIN, CA**

Dear Mr. Woodward:

This letter is to inform you that Alameda County Environmental Protection (LOP) intends to make a determination that no further action is required at the above site or to issue a closure letter. Please notify this agency of any input and recommendations you may have on these proposed actions within 20 days of the date of this letter.

In accordance with section 25297.15 of Ch. 6.7 of the Health & Safety Code, you must provide certification to the local agency that all of the current record fee title owners have been informed of the proposed action. Please provide this certification to this office within 20 days of the date of this letter.

If you have any questions about these proposed actions, please contact me at (510) 567-6762.

Sincerely,

eva chu
Hazardous Materials Specialist

c: Chuck Headlee, RWQCB
William McCammon, Alameda County Fire Dept, QIC Code 41401

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



11-20-01

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

RO0002432

November 19, 2001

Mr. Roger Woodward
P.O. Box 2688
Dublin, CA 94568

RE: Sensitive Receptor Survey for 6973 Village Parkway, Dublin, CA 94568

Dear Mr. Woodward:

I have completed review of Gribi Associates' September 2001 *Report of Groundwater Monitoring Conducted on July 27, 2001* and the case file for the above referenced site. Subsurface investigations conducted to date have identified approximately 1,000ppb MTBE in groundwater beneath the site. The extent of the plume has not been delineated. However, assuming that the plume is relative short in length, and it is demonstrated that there are no sensitive receptors that may be impacted by the plume, the case can still be closed. Therefore, please have a sensitive receptor survey prepared for the site.

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

eva chu

email: James Gribi

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



07-09-01

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

RO0002432

July 3, 2001

Mr. Roger Woodward
P.O. Box 2688
Dublin, CA 94568

RE: Quarterly Groundwater Monitoring at 6973 Village Parkway, Dublin, CA

Dear Mr. Woodward:

I have completed review of Gribi Associates' March 2001 *Report of Soil, Soil Vapor, and Groundwater Sampling* prepared for the above referenced site. That report summarized the advancement of two soil borings (IB-3 and IB-4), the collection of a soil vapor sample (VS-1), and the installation of a groundwater monitoring well (MW-1) at the site. Soil from boring MW-1 contained up to 4,600ppm TPHd and 850ppm TPHg. Groundwater from well MW-1 contained up to 670ppb TPHg and 1,700ppb MTBE. Grab groundwater samples from IB-3 contained 150ppb TPHg and 390ppb MTBE. The soil vapor sample contained low levels of BTEX constituents.

At this time, please continue with quarterly groundwater monitoring of well MW-1. Groundwater should be analyzed for TPHg, TPHd, BTEX, and MTBE.

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

eva chu
Hazardous Materials Specialist

email: James Gribi

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SWT 3-21-2000
including call

PO2890 (C)
RO 2432 (C)

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

StID 696

March 20, 2000

Mr. Roger Woodward
P.O.Box 2688
Dublin, CA 94568

RE: Work Plan Approval for 6973 Village Parkway, Dublin, CA

Dear Mr. Woodward:

I have completed review of Gribi Associates' March 20, 2000 facsimile transmittal of a work plan entitled *Workplan to Conduct Site Closure Activities* prepared for the above referenced site. The proposal to install one groundwater monitoring well downgradient from the former east fuel dispenser, to drill two exploratory borings downgradient of former Boring IB-1 and IB-2, and to collect a soil vapor sample beneath the Corwood Car Wash cashier's kiosk is acceptable. It is recommended that a soil sample be collected from the vadose zone (of the boring proposed downgradient of former Boring IB-2) for soil parameter measurements (bulk density, total organic carbon content, water content, and porosity). Data collected from this investigation will be used to prepare a Risk-Based Corrective Action (RBCA) assessemnt.

Field activities should commence within 90 days of the date of this letter. Please provide 72 hours notice prior to the start of field work. I will be away from the office until April 17, 2000. In the meantime, if you have any general questions about the site, you may contact Mr. Barney Chan at (510) 567-6765).

eva chu
Hazardous Materials Specialist

email: Jim Gribi (jegribi@email.msn.com)
Barney Chan (bchan@co.alameda.ca.us)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SNT ~~11/1~~ 3-2-20

202432

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

StID 696

March 1, 2000

Mr. Roger Woodward
P.O.Box 2688
Dublin, CA 94568

RE: Work Plan Approval for 6973 Village Parkway, Dublin, CA

Dear Mr. Woodward:

I have completed review of Gribi Associates' March 1, 2000 facsimile transmittal of a work plan entitled *Workplan to Conduct Soil and Groundwater Investigation* prepared for the above referenced site. The proposal to advance two soil borings immediately south of the former tank complex to collect soil and grab groundwater samples is acceptable. All samples will be analyzed for TPHg, TPHd, BTEX, and MTBE. In addition, the grab groundwater samples should be analyzed for MTBE and other oxygenates (EDB, TBA, etc.) using EPA Method 8260 or comparable. A report summarizing this phase of the investigation is due within 60 days upon completion of field work.

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

eva chu
Hazardous Materials Specialist

email: Jim Gribi (jegribi@email.msn.com)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SWT 2-29-2000
mcd eel's

PO2432 (6)
PO2890 (C)

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

StID 696

February 28, 2000

Mr. Roger Woodward
P.O.Box 2688
Dublin, CA 94568

RE: Soil Borings at 6973 Village Parkway, Dublin, CA

Dear Mr. Woodward:

I have completed review of Gribi Associates' facsimile transmittal of an abbreviated *Report of Underground Storage Tank Removal Activities*, dated February 28, 2000. That report summarized UST removal, soil and groundwater sampling activities conducted at the above referenced site in January 31 through February 21, 2000. Laboratory analytical data revealed moderate levels of diesel and gasoline constituents in soil and groundwater.

At this time, in order to delineate the extent of groundwater contamination, it is recommended that a minimum of two soil borings be advanced at the site (one downgradient of the former tank pit, and one downgradient of the former dispensers) and grab groundwater samples be collected from each borehole. A workplan for the advancement of the soil borings should be submitted to this office for review.

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

eva chu
Hazardous Materials Specialist

email: Jim Gribi (jegribi@email.msn.com)

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

✓ RO# 2432

RO# 2890

Certified Mailer #: P 368 729 435

July 23, 1999

Roger L. Woodward, President
R. L. Woodward Industries Inc.
P. O. Box 2688
Dublin CA 94568

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

STOP 696

**RE: Removal of Underground Storage Tanks (USTs) at Corwood
Carwash, 6973 Village Parkway, Dublin CA 94568**

Dear Mr. Woodward:

This office has received your letter dated June 30, 1999. Apparently you were confused as to the meaning of the temporary closure provisions of Title 23 and the procedures of this office in enforcing those provisions.

Accordingly, this office is willing to give you the benefit of the doubt regarding the permanent closure (removal) of the underground storage tanks at the above site.

However, in order for this office to permit you to remove the tanks no later than November 15, 1999 you are required to submit a written plan for the removal of the tanks. The closure plan was mailed to you with the June 7, 1999 letter. The completed closure plan with permit fees is required to be submitted no later than **September 1, 1999**. Include with the closure plan a check made payable to "Treasurer, County of Alameda" in the sum of \$993.00.

If you have any questions regarding this letter you can contact me at (510) 567-6781.

Sincerely,

Robert Weston
Senior Hazardous Materials Specialist

c: Tom Peacock, ACDEP-files
Bob Chambers, Alameda County District Attorney's Office
Catherine Johnson, Wendel, Rosen, Black & Dean, 1111 Broadway,
24th Floor, Oakland CA 94607

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



P02932

Certified Mailer #: Z 115 363 845

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

June 7, 1999

Catherine Johnson
Wendel, Rosen, Black & Dean
1111 Broadway, 24th Floor
Oakland CA 94607

**RE: Underground Storage Tanks (USTs) at Corwood Carwash, 6973
Village Parkway, Dublin CA 94568**

Dear Ms. Johnson:

This office received a telephone call from you this morning inquiring about the status of the temporary closure for the two USTs at the site. You stated that you are acting on behalf of the site owner, Roger Woodward.

In our telephone conversation you mentioned a statement made by me to Ms. Mazza, the alternate contact person for the business. In that previous conversation the requirement to remove the USTs by July 1, 1999 had been stated. The reason for the July 1 deadline is due to several factors. A finding that the cathodic protection system was found defective and not operating properly during January 1998. Subsequent repairs in July 1998 failed to make the system operational. No further repairs have been made. Mr. Woodward has historically been recalcitrant in providing information required by this office for the operation of the tanks. On numerous occasions this office has requested information from Mr. Woodward for the purpose of verifying regulatory compliance. The verification process for the December 22, 1998 deadline started on December 31, 1997. Mr. Woodward was given almost a full year lead time to assure that the station conformed with all the requirements. A follow-up letter was sent on January 27, 1998 explaining the options for tank leak detection. No response to either letter was received from Mr. Woodward. On March 3, 1998 a Notice of Violation was sent addressing the issues previously requested on December 31, 1997.

On March 25, 1998 documents were finally received from Mr. Woodward partially addressing the requirements stated in the

Corwood Carwash
6973 Village Parkway
Dublin CA 94568
page 2 of 3

previous letters.

On April 15, Mr. Woodward and I had a telephone conversation regarding the methods used for tank leak detection. A Notice of Stoppage of fuel delivery letter was mailed on July 15, 1998. The notice was necessary because the station did not meet the minimum standards for tanks on the upcoming deadline of December 22, 1998. This after a letter sent seven months earlier warning of the impending deadline.

The Second Notice of Violation was sent on October 15, 1998 to Mr. Woodward. These ongoing violations were for failure to provide documents required as a condition of the permit to operate. The first request for documents was on December 31, 1997 and ten months later the permit conditions are still being violated by Mr. Woodward.

On November 16, 1998 a letter requesting temporary closure was received by this office. With that letter Mr. Woodward attaches a letter from Corrosion Engineering Associates Inc., which states that the cathodic protection system has failed and has been out of service since at least January 1998. According to the letter from Corrosion Engineering Associates Inc., the cost of repairing the system was estimated at \$9,800. According to Mr. Woodward, the lack of gasoline sales did not warrant the continued operation of the USTs and the high cost of repairing the impressed current cathodic protection. Furthermore in the November 1998 letter Mr. Woodward stated that the use of the tanks would ultimately be discontinued.

One of the compliance issues requested by this office was the cathodic protection test results. The cathodic protection system is required to be certified, by a cathodic protection tester, that the system is operating properly. That system protects the bare steel of the single wall tank against pitting and leaks from holes in the tank.

This office has not granted a temporary closure to the Corwood Carwash USTs. The USTs do not fulfill the criteria of temporary closure since the product has not been emptied and the cathodic protection has failed. Tanks cannot be temporarily closed to delay the cost of removal.

Accordingly, a written plan for either the continued operation of the tanks at the site or the removal of the tanks is required to be submitted by July 1, 1999. Include in the operating plan a

Corwood Carwash
6973 Village Parkway
Dublin CA 94568
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submittal of all documents to satisfy previous requests by this office. If the tanks are **not** planned to be placed back into service then a closure plan shall be submitted by July 1, 1999 for the removal of the two tanks in a timely manner. A timely manner would be no later than August 1999.

A copy of correspondence between this office and Mr. Woodward is enclosed along with a Tank Closure Permit Application.

If you have any questions regarding this letter you can contact me at (510) 567-6781.

Sincerely,



Robert Weston
Senior Hazardous Materials Specialist

enclosures

wo/enclosures

c: Tom Peacock, ACDEP-files
Bob Chambers, Alameda County District Attorney's Office