

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director

May 11, 2004



5-13-04  
ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

Mr. Kelly Engineer  
All Star Inc.  
1791 Pine St.  
Concord, CA 94620

Dear Mr. Engineer:

Subject: Fuel Leak Case RO0002541, 1220 W. Tennyson Road, Hayward, CA 94544

Alameda County Environmental Health (ACEH) has reviewed the case file for the subject site including the April 26, 2004 Limited Subsurface Investigation Report and the March 2004 Groundwater Monitoring Report prepared by ACC Environmental Consultants. These reports summarize the soil and groundwater results of the subsurface investigation performed at the site on October 6, 2003 and the first quarter monitoring results performed on March 22, 2004. Additional work will be required to progress your site towards closure. We request that you address the following technical comments when performing the requested work and submit the technical reports requested below.

#### TECHNICAL COMMENTS

##### TECHNICAL REPORT SUBMISSION

1. The Limited Subsurface Investigation Report was granted a three-week extension for submittal and was due on September 29, 2003. Therefore, this report was submitted over six months past its deadline. You are requested to submit all reports according to their respective due dates.

##### SENSITIVE RECEPTOR SURVEY

2. The location(s) of off-site wells has been an on-going question. ACEH understands that interviews have been made with residents and one well is believed to have been destroyed. Our office requests a formal sensitive receptor report be submitted. A survey of neighboring properties within a ¼ mile down-gradient radius of this site should be performed to confirm the absence of irrigation/domestic wells and subsurface basements. Please note the method of decommissioning all wells. If basements exist, note the presence or absence of a cement foundation. Minimally, the residences on Pompano Ave., Mantilla Ave., Havana Ave., Pensacola Ave. and Cortez St. should be surveyed. The location of the one well referenced above and any others should be noted on the final sensitive receptor report. The report should be submitted as requested below.

##### BORING LOGS AND CROSS-SECTIONS

3. Nine borings were drilled in the October 2003 investigation, however, the report only provides the boring logs for borings SB1, SB2 and SB6. Please provide the logs for the other borings. In addition, we request that cross-sectional diagrams be submitted in north-south and east-west directions for the site.

Mr. Engineer  
RO0002541, 1220 W. Tennyson Rd., Hayward 94544  
May 11, 2004  
Page 2 of 3

#### ISOCONCENTRATION CONTOURS

4. Please provide iso-concentration plots for TPHg, BTEX and MTBE in soil for the site. These figures should be used to support your conclusions made regarding the extent of delineation of petroleum contamination.

#### ETHER OXYGENATES AND LEAD SCAVENGER ANALYSIS

5. It is noted that the other ether oxygenates, TBA, DIPE, ETBE and TAME have only been analyzed for once at this site, during the 4/01 monitoring of MW-3. TBA was reported at 1500 ppb while MTBE was reported at 760 ppb. Significant MTBE has been detected in wells and grab groundwater samples subsequent to this. Therefore, future monitoring well and grab groundwater samples should be analyzed for these other ether oxygenates. In addition, the lead scavengers EDB and EDC should also be tested at least once in the highest impacted well.

#### OBSERVATION WELLS

6. It was further noticed that an observation well, OB-2 was also sampled during the 4/01 event. During the 2/24/03 monitoring event, an observation well was sampled by accident instead of MW-2. Please indicate on a figure the location(s) of all observation wells and note which ones were sampled. Up to 100,000 ppb MTBE was reported in these wells in 4/01. Please determine whether these wells can still be sampled, whether they still represent a source of contamination and whether they can be used for remediation.

#### ADDITIONAL ON AND OFF-SITE INVESTIGATION

7. Our office does not concur with the conclusions in April 26, 2004 Limited Subsurface Investigation Report. The limited soil and groundwater data does not suggest that the vertical extent of contamination in soil has been defined (see B-3-12.0). Prior investigations have been limited in their vertical delineation. In addition, the extent of contamination in groundwater has not been defined. Elevated TPH grab groundwater samples from SB6, SB7 and elevated MTBE in SB9 indicate the plume has migrated offsite. This plume cannot be characterized by only one groundwater result, ie that from boring SB8. Without additional groundwater sampling, you cannot assume that TPHg, BTEX and MTBE concentrations have attenuated down-gradient of the site. Our office concurs that additional investigation and remedial action should be performed. However, the installation of one additional well is not sufficient to complete site characterization. A minimum of one additional onsite well and multiple off-site wells and borings should be considered. In addition, a feasibility study should be performed prior to recommending ORC injections as the best remedial action.

Mr. Engineer  
RO0002541, 1220 W. Tennyson Rd., Hayward 94544  
May 11, 2004  
Page 3 of 3

TECHNICAL REPORT REQUEST

- June 14, 2004- Boring logs, cross-sectional diagrams, soil iso-concentration contours
- June 30, 2004- Second quarter 2004 monitoring report include ether oxygenates and lead scavenger analysis, information regarding observation wells, work plan for additional on and off-site investigation and feasibility study.
- September 30, 2004- Third quarter 2004 monitoring report and Sensitive Receptor survey
- December 30, 2004- Fourth quarter 2004 monitoring report

Please contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, D. Drogos

Mr. D. Dement, ACC Env. Consultants, 7977 Capwell Drive, Suite 100, Oakland, CA 94621  
Mr. H. Murphy, City of Hayward Fire Dept., 777 B St., Hayward, CA 94541  
Mr. P. Rosenstein, Esq., 55 Santa Clara Ave., Suite 250, Oakland, CA 94610  
Ms. S. Torrence, Alameda County District Attorney Office, 7677 Oakport, Suite 400,  
Oakland 94621

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



07-24-03

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-8577  
(510) 567-6700  
FAX (510) 337-9335

July 21, 2003

Mr. Kelly Engineer  
All Star Inc.  
1791 Pine St.  
Concord, CA 94620

Dear Mr. Engineer:

Subject: Fuel Leak Case RO0002541, 1220 W. Tennyson Rd., Hayward, CA 94544

Alameda County Environmental Health, Local Oversight Program (LOP), has received and reviewed the July 11, 2003 Revised Work Plan – Limited Subsurface Investigation for the referenced site prepared by ACC Environmental Consultants. This work plan responds to technical comments included in my June 11, 2003 which comments on our office's evaluation of the original May 28, 2003 ACC work plan. The revised work plan is approved with the following technical comments and conditions.

Technical Comments

- Please note that all soil and groundwater samples should be analyzed for the constituents TPHg, BTEX, MTBE, ether oxygenates and lead scavengers by EPA 8260.
- Our office requests that two additional borings be advanced to determine potential impact to the neighboring residential properties. One boring should be approximately 40 feet north of proposed boring B10 and the other approximately 50 feet west of proposed boring B4. In addition, the location of proposed boring B1 should be moved approximately 30 feet to the west. To limit the number samples analyzed, you may consider putting on hold (and not running) those samples that are down-gradient of samples with non-detectable (ND) concentrations of contaminants of concern. Both soil and groundwater samples should be collected from these two additional borings.

Technical Report Request

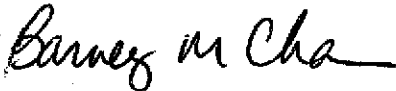
Based upon this work plan approval it appears that your consultant will be prepared to perform this work and submit a technical report of findings and recommendation to our office within 40 days of work plan approval. Therefore, please submit the following technical reports according to the following schedule.

- June 30, 2003- 2<sup>nd</sup> Quarter 2003 QMR
- September 8, 2003- Subsurface Investigation Report
- September 30, 2003- 3<sup>rd</sup> Quarter 2003 QMR
- December 30, 2003- 4<sup>th</sup> Quarter 2003 QMR

Mr. Kelly Engineer  
RO0002541, 1220 W. Tennyson Rd., Hayward, CA 94544  
July 21, 2003  
Page 2

You may contact me at 510-567-6765 if you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, D. Drogos

Mr. D. Dement, ACC Environmental Consultants, 7977 Capwell Drive, Suite 100,  
Oakland 94621

Mr. Hugh Murphy, Hayward Fire Department, 777 B Street, Hayward, CA 94541

Mr. Paul Rosenstein, Esq., 55 Santa Clara Ave., Suite 250, Oakland, CA 94610

Ms. S. Torrence, Alco District Attorney Office, 7677 Oakport St., Suite 400,  
Oakland, CA 94621

RevWp1220WTennyson

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



13-03  
ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

June 11, 2003

Mr. Kelly Engineer  
All Star Inc.  
1791 Pine St.  
Concord, CA 94620

Dear Mr. Engineer:

Subject: Fuel Leak Case RO0002541, 1220 W. Tennyson Rd., Hayward, CA 94544

Please be informed that the Hayward Fire Department has transferred the oversight of your underground storage tank fuel leak case to Alameda County Environmental Health, Local Oversight Program (LOP). Our office has reviewed the case file for the subject site including the May 28, 2003 Work Plan- Limited Subsurface Investigation from ACC Environmental Consultants. We have also spoke with the Hayward Fire Department (HFD) staff. We anticipate working with the HFD and providing them current case information to help them with site operating decisions. We recommend you copy the HFD on your correspondences and keep them informed of all site activities. The ACC work plan proposes to advance numerous Geoprobe borings in the assumed down and cross-gradient directions of the site and collect soil and groundwater samples for chemical analysis. The intent of the investigation is to define the lateral extent of the groundwater contamination and obtain a cross-sectional profile of the subsurface soils to better understand the migration potential of contamination. Our office generally approves of the work plan, however, we request that you address the following technical comments in the form of a work plan addendum and submit the technical reports requested below.

Technical Comments

1. The extent of the groundwater plume must be defined both up- and down-gradient of the site. The presence of residences adjacent to the site requires delineation to verify the potential impact to these sensitive receptors. Please add appropriate additional borings to complete this investigation. We note that the three monitoring wells represent the minimum number of wells to determine gradient and therefore, may not totally represent the site conditions.
2. We concur that the ether oxygenates should be run by EPA Method 8260. The entire suite of ether oxygenates plus the lead scavengers (EDB and EDC) should be run regardless of the concentration of MTBE detected. Please note that some ether oxygenates. All future groundwater monitoring should run the ether oxygenates using EPA 8260 not EPA 8021.
3. Our office concurs with the recommendation to sample the known domestic well located on the residential property down-gradient of the site. Please indicate the location, address and property owner of this residence and inform our office if you need us to contact the owner. We request that you perform a sensitive receptors (wells, basements, surface water, vaults, etc.) and utilities survey. We recommend that a door-to-door survey be performed since wells may have been installed without regulatory permits.

Mr. Kelly Engineer  
RO0002541, 1220 W. Tennyson Rd., Hayward, CA 94544  
June 11, 2003  
Page 2

4. We request that you sample the observation wells located within the former tank pit. These water samples should be analyzed for the same analytes as those samples from the Geoprobe borings. These wells offer information and points for potential remediation. Please include these well locations, an outline of the former UST pit and all existing and former dispenser islands on your site figures for easy reference.
5. Please provide our office with copies of the quarterly monitoring reports for the events of 11/25/02 and 2/24/03, missing from our files, and all future monitoring events.
6. Because of the elevated MTBE reported at this site, up to 59,000 ppb (parts per billion), you are required to perform interim remediation at the site. Please address this requirement in your work plan addendum. Please note future requirements will include performance of a human health and ecological risk assessment and a proposal for a Corrective Action Plan (CAP).

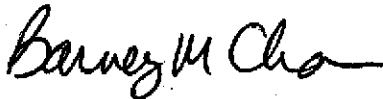
#### Technical Report Request

Please submit the following technical report to our office according to the following schedule.

- July 11, 2003- Work plan addendum, requested QMRs and response to above items.
- June 30, 2003- 2<sup>nd</sup> Quarter 2003 QMR
- September 30, 2003- 3<sup>rd</sup> Quarter 2003 QMR
- December 30, 2003- 4<sup>th</sup> Quarter 2003 QMR

You may contact me at 510-567-6765 if you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, D. Drogos

Mr. D. Dement, ACC Environmental Consultants, 7977 Capwell Drive, Suite 100,  
Oakland 94621

Mr. Hugh Murphy, Hayward Fire Department, 777 B Street, Hayward, CA 94541

Mr. Paul Rosenstein, Esq., 55 Santa Clara Ave., Suite 250, Oakland, CA 94610

Ms. S. Torrence, Alco District Attorney Office, 7677 Oakport St., Suite 400,  
Oakland, CA 94621

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

June 5, 2003

Mr. Kelly Engineer  
1791 Pine Street  
Concord, CA 94520

Dear Mr. Engineer:

Subject: Fuel Leak Case No. RO0002541, Five Star Auto Care, 1220 W. Tennyson Rd.,  
Hayward, CA 94544

**LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS:**

This letter is to inform you of new legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, Exxon Co., USA c/o yourself, has been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change. In addition, our office is considering your request for site closure. Please also complete and submit a "notice of proposed action submitted to local agency" form. You may use sample letter 3, enclosed.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.