

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
08-01-06

July 31, 2006

Mr. Cary Grayson
P.O. Box 1435
Alamo, CA 94596

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

Dear Mr. Grayson:

Subject: Fuel Leak Case RO0002862, 6310 Houston Place, Dublin, CA 94568

Alameda County Environmental Health (ACEH) staff has received and reviewed the file for the subject site including the June 28, 2006 Soil and Groundwater Investigation Report prepared by AEI Consultants. The report gives analytical results for soil and groundwater samples collected from borings installed to investigate the extent of petroleum contamination release from the former 12, 000 gallon diesel tank removed in 2004. Though only up to 53 parts per million TPH as diesel was detected in shallow soil samples, up to 580 mg/l TPH as diesel was detected in grab groundwater samples. The elevated diesel in groundwater was detected in all the samples and includes locations near the former dispenser island, product line and down-gradient of the tank hold and tank. Based upon these results the site will require additional groundwater investigation, installation of permanent monitoring wells and remediation.

TECHNICAL REPORT REQUEST

Please submit a work plan to monitor and delineate the extent of the petroleum plume and propose remediation options. You should use data from the previous investigation at this site, for gradient, well construction and well locations. We understand you would like to expedite site investigation and closure. Remediation will, therefore, likely be required. Please submit your work plan by August 31, 2006.

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. 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

Mr. Cary Grayson
6310 Houston Place, Dublin
Page 2 of 3

Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](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.

Mr. Cary Grayson
6310 Houston Place, Dublin
Page 3 of 3

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: files, D. Drogos

Mr. Peter McIntyre, AEI Consultants, 2500 Camino Diablo, Suite 200, Walnut Creek,
CA 94597

Matt Katen, Zone 7 Water District, QIC 90201

Ms. Shari Knieriem, SWRCB Cleanup Fund, P.O. Box 944212, Sacramento,
CA 94244-2120

7_31_06 6310 Houston Place

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
3-13-06

March 10, 2006

Mr. Cary Grayson
2413 Stirrup Court
Walnut Creek, CA 94596

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

Dear Mr. Grayson:

Subject: Fuel Leak Case RO0002862, 6310 Houston Place, Dublin, CA 94568

Alameda County Environmental Health (ACEH) staff has received and reviewed the February 24, 2006 *Workplan Addendum* prepared by AEI Consultants, which responds to the County's 1/20/06 technical response letter. Boring locations have been proposed based upon County comments. Our office approves the work plan with the following exception and comment. Please relocate proposed boring SB-1 to the east side of the former tank hold as opposed to the proposed west side location. This recommendation is based upon the anticipated southeast gradient and the lack of data in this location. Based upon the results of this investigation, further off-site characterization may be required.

TECHNICAL REPORT REQUEST

Please submit the following reports according the schedule below.

- May 19, 2006- Soil and groundwater investigation report

ELECTRONIC SUBMITTAL OF REPORTS

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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.

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PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

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

Mr. Cary Grayson
6310 Houston Place, Dublin
Page 3 of 3

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. Peter McIntyre, AEI Consultants, 2500 Camino Diablo, Suite 200, Walnut Creek,
CA 94597

Matt Katen, Zone 7 Water District, QIC 90201

3_10_06 6310 Houston Place

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

SENT
01-23-06

January 20, 2006

Mr. Cary Grayson
2413 Stirrup Court
Walnut Creek, CA 94596

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

Dear Mr. Grayson:

Subject: Fuel Leak Case RO0002862, 6310 Houston Place, Dublin, CA 94568

Alameda County Environmental Health (ACEH) staff has received and reviewed the July 11, 2005 *Soil and Groundwater Investigation Workplan* prepared by AEI Consultants, which responds to the County's April 12, 2005 technical report request. As you recall, during the October 27, 2004 removal of a 12,000 gallon diesel tank, diesel and low levels of MTBE were detected in water samples taken from the UST excavation and the dispenser area. To determine the severity and extent of the groundwater contamination, the work plan proposes the drilling of four (4) borings and the sampling of soil and groundwater from each of the borings. We have the following technical comments for you to address when performing this work and request you submit the technical report as stated below.

TECHNICAL COMMENTS

Much is already known about this site from the previous investigation, which occurred following the removal of four USTs in March 1989. The subsurface geology and groundwater gradient has been characterized. Residual soil and groundwater contamination was left in-place when site closure was granted in February 1995. The results from the October 2004 tank removal plus the results from an April 2001 sampling of the wells 2, 4 and 5 indicate an additional release occurred from the 12,000 gallon tank which is addressed in this work plan.

The location of the proposed borings should clarify whether the release is localized or widespread. Therefore, we concur with the proposed borings immediately adjacent and down-gradient of the dispenser (SB-4) and request that SB-1 be located outside the former tank pit. Based upon the results of the April 2001 groundwater sampling, borings should be drilled near MW-1 (or MW-1 re-sampled if still present) and also down-gradient of MW-1 and MW-5. It appears that borings may need to be located beyond the property boundary to adequately define the lateral extent of the release. Sufficient soil samples should be collected to verify the vertical extent of contamination. It is noted that the 5200 ppb diesel reported in MW-1 from the April 2001 sampling was described as unmodified or weakly modified diesel, ie from a more recent release. Please submit a revised boring location figure to our office as requested below.

TECHNICAL REPORT REQUEST

Please submit the following reports according the schedule below.

- February 20, 2006- Revised boring location figure
- February 20, 2006- Well closure report for MW-1 through MW-6, if wells still present, sampling report for existing wells for the following analytes: TPHd, BTEX and MTBE.
- May 19, 2006- Soil and groundwater investigation report

ELECTRONIC SUBMITTAL OF REPORTS

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PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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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

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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. Peter McIntyre, AEI Consultants, 2500 Camino Diablo, Suite 200, Walnut Creek,
CA 94597

Matt Katen, Zone 7 Water District, QIC 90201

1_19_06 6310 Houston Place

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
4-13-05

April 12, 2005

Cary Grayson
G & G International holding Co.
2413 Stirrup Court
Walnut Creek, California 94596

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

Subject: Fuel Leak Case No. RO0002862, Bay Counties Petroleum, Former UST Site at
6310 Houston Place, Dublin, California – Workplan Request

Dear Mr. Grayson:

Alameda County Environmental Health (ACEH) has reviewed your December 2, 2004, *Tank Closure Report* prepared by Golden Gate Tank Removal, Inc., for the above-referenced site. Separate phase hydrocarbons (SPH) was observed on groundwater in the underground storage tank (UST) excavation during removal activities conducted on October 27 and 28, 2004. Up to 23.8 mg/kg TPHd, 0.018 mg/kg xylenes and 0.11 mg/kg MTBE were detected in soil beneath a former fuel dispenser location, and up to 300 ug/L TPHd and 38 ug/L MTBE were detected in groundwater encountered within the UST excavation. Please submit a site investigation workplan which addresses the technical comments below.

Guidance for preparing this workplan and for other corrective action tasks at Leaking Underground Storage Tank (LUFT) sites can be found in the Tri-Regional guidelines. A recent update to the Tri-Regional Guidelines was prepared by the RWQCB-CVR, *Appendix A – Reports Tri - Regional Board Staff Recommendations For Preliminary Investigation And Evaluation Of Underground Tank Sites* dated April 16, 2004 and is available at: <http://www.waterboards.ca.gov/centralvalley/>. ACEH considers guidance from Federal and State agencies, including the RWQCB-SFBR, the DTSC and the RWQCB-CVR, in determining appropriate corrective action needs for fuel or hazardous materials release sites in Alameda County.

TECHNICAL COMMENTS

1. Regional Geologic and Hydrogeologic Study

We request that you perform a study of the regional geologic and hydrogeologic setting of your site by reviewing the available technical literature for the area. References for your review need to include regional geologic maps, United States Geological Survey (USGS) technical reports and documents, Department of Water Resources (DWR) Bulletins, Regional Water Quality Control Board reports on the groundwater basin, data from contaminant investigations in the area, etc. Please provide: 1) a concise narrative discussion of the regional geologic and hydrogeologic setting, 2) figure(s) summarizing your findings, and 3) synthesis and interpretation of regional data with the existing site-specific data. We request that you appropriately reference your findings, and that you present photocopies of regional geologic maps, groundwater contour maps, cross-sections, etc., to illustrate your results. Please report your results in the workplan requested below.

2. Delineation of Soil Contamination

In accordance with 23 CCR 2725(a), we require that you define the likely vertical extent of contamination. During excavation, groundwater was encountered within the UST pit, however, groundwater levels in the region are known to fluctuate. No soil samples appear to have been collected from the bottom of the UST excavation. We request that you propose investigation tasks to evaluate the potential presence of contaminated soil beneath the former USTs. To initiate vertical delineation of the source area, we recommend that you collect and analyze soil samples from a boring within or immediately downgradient of the former UST location to at least 10 ft below the total depth of impact, as identified by field screening of samples. Please submit your sampling and analysis plan in the workplan requested below.

3. Delineation of Groundwater Plume

We request that you propose investigation tasks to evaluate the extent of groundwater contamination. Groundwater sample(s) need to be collected near the former fuel dispensers and downgradient the former UST location. As part of this effort, we request that you propose tasks to evaluate the groundwater flow direction at the site. Please note that your findings relative to vertical distribution of soil contamination (Comment 2, above), need to be considered in your evaluation of the vertical extent of groundwater contamination. Please submit your sampling and analysis plan in the workplan requested below.

4. Conduit Study

Due to the relatively shallow depth to groundwater and the potential presence of storm drains and other subsurface utilities downgradient of former UST location, we request that you perform a preferential pathway survey, and consider any potential influences on contaminant migration prior to developing a sampling and analysis plan. The objectives of the conduit study are to 1) locate potential migration pathways, and 2) evaluate the potential for contaminant migration via the identified pathways. We request that you perform a conduit study that details the potential migration pathways and potential conduits (including sewers, storm drains, other subsurface utilities, etc.) that may be present in the vicinity of the site. Provide a map showing the location and depths of all utility lines and trenches within and near the plume area. Please include an analysis and interpretation of your findings, and report your results in the workplan requested below.

5. Well Survey

ACEH requests that you locate all wells (monitoring and production wells: active, inactive, standby, decommissioned, abandoned and dewatering, drainage and cathodic protection wells) within 2,000 ft of the subject site. We recommend that you obtain well information from both Alameda County Public Works Agency and the State of California Department of Water Resources, at a minimum. We require that you provide location addresses and copies of DWR driller's reports for all wells identified in your survey. Please report the results of your survey in the workplan requested below.

REPORT REQUEST

Please submit your *Soil and Water Investigation Workplan*, which addresses the comments above by **July 11, 2005**. ACEH makes this request pursuant to California Health & 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 a reportable unauthorized release from a petroleum UST system, and require your compliance with this request.

Professional Certification and Conclusions/Recommendations

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that workplans 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.

Perjury Statement

All workplans, 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.

UNDERGROUND STORAGE TANK CLEANUP FUND

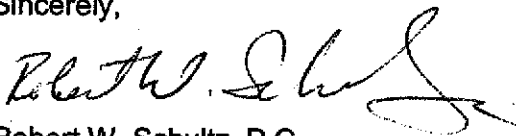
Please be aware that you may be eligible for reimbursement of the costs of investigation from the California Underground Storage Tank Cleanup Fund (USTCF). Information regarding the USTCF is available at: <http://www.swrcb.ca.gov/cwphome/ustcf/>. If you believe you meet the eligibility requirements, I encourage you to obtain an application form online or otherwise contact the USTCF directly.

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 County District Attorney or other appropriate agency, for enforcement. California Health and Safety Code, Section 25299.76 authorizes ACEH enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Please call me at (510) 567-6719 or contact me via email at robert.schultz@acgov.org with any questions regarding this case.

Sincerely,



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

cc: Matt Katen, Zone 7 Water District, QIC 90201
Donna Drogos, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program

RAFAT A. SHAHID, Assistant Agency Director

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

June 1, 1992

Fred L. Houston
Winning Action Investments, Inc.
7080 Donlon Way, Suite 208
Dublin, CA 94568

Re: 6310 Houston Pl., Dublin, CA 94568
STID # 2224

Dear Mr. Houston:

This office has reviewed the Quarterly Monitoring Report dated 14 Feb. 91. This office concurs with your (Environmental Geosciences Engineering) proposal to analyze only samples from MW1, MW2, MW3, MW5, and MW6 and to do groundwater level measurements on all 6 monitoring wells. There is still too much diesel in the groundwater (3.2 ppm and contamination in all wells except up-gradient and the off-site well) although it has seemed to decline over the last year and a half. A remediation system may be the best way to clean up the contamination now that the plume is defined. You mentioned that you were doing a voluntary quarterly monitoring of your wells although this office has not yet received another report. The last report was in February with sampling done 1/17/92 so you would be overdue for sampling. Please submit your latest quarterly monitoring report and have your consultant attach any recommendations they may have.

If you have any questions please contact this office, at 271-4530.

Sincerely,

Thomas Peacock, Supervising HMS
Hazardous Material Division

cc: Lester Feldman, RWQCB

LD



Certified Mailer # P 062 127 904

February 22, 1990

DEPT. OF ENVIRONMENTAL HLTH
HAZARDOUS MATERIALS PROG.
80 SWAN WAY, SUITE 200
OAKLAND, CA 94621
430-4530

Mr. Fred Houston
Winning Action, Dougherty Road Associates
7080 Donlon Way, Suite 110
Dublin, CA 94568

SECOND NOTICE OF VIOLATION

Dear Mr. Houston:

In a letter to you dated October 6, 1989, the Alameda County Department of Environmental Health, Hazardous Materials Division, set a deadline of November 10, 1989 for the submittal of a detailed engineering plan to remediate contaminated groundwater at 6310 Houston Pl., Dublin. This letter also required that you segregate and dispose of stockpiled soil according to waste category, and that you submit to this office receipts/manifests for disposal of all soil contaminated above 100 ppm. Not meeting this initial deadline, Safety Specialists, Inc. asked on two separate occasions for extensions, promising both times to send completed remedial work plans by dates that they set. As of the date of this letter, however, we have received nothing from you or your consultant.

As the owner of the property, you are in violation of Sec. 25298 of the California Health and Safety Code, which prohibits the improper or incomplete closure of underground storage tanks. You will not have closed these tanks, and thus will remain in violation of this section of code, until the site is cleaned up to this office's satisfaction. Section 25299 of the Health and Safety Code authorizes a penalty of up to \$5,000 per day for incomplete closure of an underground storage tank. In addition, Section 25188 permits penalties of up to \$25,000 per day to be levied for noncompliance of the provisions of Section 25187, which requires facility owners/operators to take action to address contaminated or potentially contaminated sites. Finally, in light of the fact that our 10/6/89 letter constituted a formal request for technical reports (according to Sec. 13267 of the California Water Code), your failure to respond is a violation of the Water Code. The Regional Water Quality Control Board can assess fines of \$1,000 per day for such infractions.

To reiterate, we are requiring that you develop a detailed engineering plan to collect floating product and remove it from the ground, as well as a plan to remediate groundwater with dissolved hydrocarbons; these plans must be submitted to this

Mr. Fred Houston
February 22, 1990
Page 2 of 2

office as well as to the Regional Water Quality Control Board (attn: Lester Feldman) as soon as possible, but no later than March 23, 1990. The four piles of excavation spoils that are presumed to still be on site must be disposed of immediately. According to the analytical results, small piles "A" and "B" can be disposed of in an ordinary sanitary landfill (contamination below 100 ppm). Pile "S" and portions "a," "b," and "c" of the large pile must go to a Class II landfill (contamination between 100 and 1,000 ppm), while portion "d" of this large pile must be shipped to a Class I hazardous waste facility. You will need to send to this office copies of the receipts/manifests documenting the disposal of all soil contaminated above 100 ppm.

If you have any questions about this letter, please contact the undersigned at 271-4320.

Sincerely,



Gil Wistar
Hazardous Materials Specialist

cc: Kenneth L. Meleen, Safety Specialists, Inc. (P.O. Box 4420,
Santa Clara, CA 95054)
Tom Hathcox, Dougherty Regional FD
Lester Feldman, RWQCB
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Rafat A. Shahid, Asst. Agency Director, Environmental Health
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



✓R02862

R0998

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

June 29, 1989

Mr. Fred Houston
Winning Action Investments, Inc.
7080 Donlon Way
Dublin, CA 94568

RE: Work plan for defining and remediating contamination at American
Cities Truck Lines, 6310 Huston Pl., Dublin

Dear Mr. Houston:

The Alameda County Department of Environmental Health, Hazardous Materials Division, has reviewed Kleinfelder's work plan as well as other materials submitted for the site shown above. We find the plan generally acceptable, and would like to emphasize the points discussed below.

1. The three monitoring wells described in the work plan should be installed within 10 feet of the excavation pit(s), and constructed according to Regional Water Quality Control Board (RWQCB) standards. The two perforated casings installed into the excavation pit are not adequate monitoring wells and can only be used for piezometric measurements.
2. Soil and groundwater should be analyzed for total petroleum hydrocarbons (diesel) and total oil and grease, as specified. Soil analyzes should be performed not only for the soil borings proposed, but also for soil previously removed from the pits. As a result of a recent RWQCB policy clarification, no soil that shows contamination at any level can be backfilled into excavated areas, even after remediation.
3. Stained soil from the waste oil tank pit should be removed, sampled, and disposed of, as outlined in the Kleinfelder work plan. In addition, samples should be taken from the pit following the stained soil's removal, to verify that no contaminated soil remains in this area.

The work described in Kleinfelder's plan should be carried out as soon as possible, to minimize the potential movement of diesel contaminants in groundwater. A report summarizing results of the work performed at the site should be submitted to this office no later than August 4, 1989, with recommendations for further work as appropriate.

Mr. Fred Houston
June 29, 1989
Page 2 of 2

Should you have any questions about this letter or about remediation requirements established by the RWQCB, please contact Gil Wistar, Hazardous Materials Specialist, at 271-4320.

Sincerely,

Rafat A. Shahid

Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:GW:gw

cc: Mark Klaver, Kleinfelder
Howard Hatayama, DOHS
Dyan Whyte, San Francisco Bay RWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



✓ R02862
R0998

Certified mailer #: P 833 981 407

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

May 16, 1989

Mr. Fred Huston
Winning Action Investments
7080 Donlon Way, Suite 110
Dublin, CA 94568

Re: Unauthorized releases from underground storage tanks, 6310 Huston
Place, Dublin

Dear Mr. Huston:

As you're aware, the Alameda County Department of Environmental Health witnessed the removal of four underground storage tanks at the above address on March 31, 1989. Analytical results of water samples taken from the each of the four excavation pits indicate hydrocarbon contamination between 8.5 and 380 ppm in the water. This is evidence of tank leakage and/or overfilling into these pits. Title 23 of the California Code of Regulations requires all such unauthorized releases from underground tanks to be reported. An unauthorized release report must therefore be filed with this office within 5 days of the date of this letter; in addition, you must initiate further investigation and/or cleanup activities at this site.

First, a preliminary assessment should be conducted to determine the extent of soil and groundwater contamination that has resulted from the leaking tanks. The information gathered by this investigation will be used to assess the need for additional actions at the site. The preliminary assessment should be designed to provide all of the information in the format shown in the attachment at the end of this letter. This format is based on the Regional Water Quality Control Board (RWQCB's) guidelines. You should be prepared to install monitoring wells, which should be constructed according to RWQCB specifications.

Until cleanup is complete, you will need to submit reports to this office and to the RWQCB every three months (or at a more frequent interval, if specified at any time by either agency). These reports should include information pertaining to further investigative results; the methods and costs of cleanup actions implemented to date; and the method and location of disposal of any contaminated material.

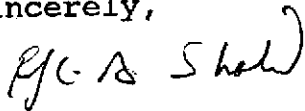
Mr. Fred Huston
May 16, 1989
Page 2 of 2

Soils contaminated at hazardous waste concentrations should be transported by a licensed hazardous waste hauler and disposed of or treated at a facility approved by the California Department of Health Services. Soils contaminated below the hazardous waste threshold may be managed as nonhazardous, but are still subject to the RWQCB's waste discharge requirements.

Your work plan should be submitted to this office by **June 16, 1989**. A report describing the results of the preliminary site assessment should be submitted by **July 21, 1989**. Copies of the proposal and report should also be sent to the RWQCB (attention: Dyan Whyte). You may implement remedial actions before approval of the work plan, but final concurrence by this office will depend on the extent to which the work done meets the requirements described in this letter.

You will need to submit an additional deposit of \$300 to cover costs that the Division of Hazardous Materials incurs during remediation oversight. If you have any questions about this letter or about remediation requirements established by the RWQCB, please contact Gil Wistar, Hazardous Materials Specialist, at 271-4320.

Sincerely,



Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:GW:gw

enclosure

cc: ~~W~~ Howard Hatayama, DOHS (w/o enclosure)
Dyan Whyte, San Francisco Bay RWQCB (w/o enclosure)
Gil Jensen, District Attorney, Alameda County Consumer and
Environmental Protection Agency (w/o enclosure)
files

WORK PLAN REQUIREMENTS FOR AN INITIAL SUBSURFACE INVESTIGATION

This outline should be followed by professional engineering or geologic consultants in preparing work plans to be submitted to the RWQCB and local agencies. Work plans should be signed by a California-registered engineer or geologist.

This outline should be referred to in context with the "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks" (June 2, 1988).

PROPOSAL FORMAT

I. Introduction

A. State the scope of work

B. Provide information on site location, background, and history

1. Describe the type of business and associated activities that take place at the site, including the number and capacity of operating tanks.

2. Describe previous businesses at the site.

3. Provide other tank information:

- number of underground tanks, their uses, and construction material;

- filing status and copy of unauthorized release form, if not previously submitted;

- previous tank testing results and dates, including discussion of inventory reconciliation methods and results for the last three years.

4. Other spill, leak, and accident history at the site, including any previously removed tanks.

II. Site Description

A. Describe the hydrogeologic setting of the site vicinity

B. Prepare a vicinity map (including wells located on-site or on adjoining lots, as well as any nearby streams)

C. Prepare a site map

D. Summarize known soil contamination and results of excavation

1. Provide results in tabular form and indicate location of all soil samples (and water samples, if appropriate). Sample dates, the identity of the sampler, and signed laboratory data sheets need to be included, if not already in possession of the County.
2. Describe any unusual problems encountered.
3. Describe methods for storing and disposing of all contaminated soil.

III. Plan for Determining Extent of Soil Contamination

- A. Describe method for determining the extent of contamination within the excavation
- B. Describe sampling methods and procedures to be used
 1. If a soil gas survey is planned, then:
 - identify number of boreholes, locations, sampling depths, etc.;
 - identify subcontractors, if any;
 - identify analytical methods;
 - provide a quality assurance plan for field testing.
 2. If soil borings are to be used to determine the extent of soil contamination, then:
 - identify number, location (mapped), and depth of the proposed borings;
 - describe the soil classification system, soil sampling method, and rationale;
 - describe the drilling method for the borings, including decontamination procedures;
 - explain how borings will be abandoned.
- C. Describe how clean and contaminated soil will be differentiated, and describe how excavated soil will be stored and disposed of. If on-site soil aeration is to be used, then describe:
 1. The volume and rate of aeration/turning;
 2. The method of containment and cover;
 3. Wet-weather contingency plans;

4. Results of consultation with the Bay Area Air Quality Management District.

Other on-site treatments (such as bioremediation) require permits issued by the RWQCB. Off-site storage or treatment also requires RWQCB permits.

- D. Describe security measures planned for the excavated hole and contaminated soil

IV. Plan for Characterizing Groundwater Contamination

Construction and placement of wells should adhere to the requirements of the "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks."

- A. Explain the proposed locations of monitoring wells (including construction diagrams), and prepare a map to scale
- B. Describe the method of monitoring well construction and associated decontamination procedures
 1. Expected depth and diameter of monitoring wells.
 2. Date of expected drilling.
 3. Locations of soil borings and sample collection method.
 4. Casing type, diameter, screen interval, and pack and slot sizing technique.
 5. Depth and type of seal.
 6. Development method and criteria for determining adequate development.
 7. Plans for disposal of cuttings and development water.
 8. Surveying plans for wells (requirements include surveying to established benchmark to 0.01 foot).
- C. Groundwater sampling plans
 1. Water level measurement procedure.
 2. Well purging procedures and disposal protocol.
 3. Sample collection and analysis procedures.
 4. Quality assurance plan.
 5. Chain-of-custody procedures.

V. Prepare a Site Safety Plan