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

October 6, 2003

Mr. Dennis O'Keefe
Golden Gate Petroleum
501 Shell Avenue
Martinez, 94553

Re: Fuel Leak Case No. RO160, Hayward Bulk Petroleum Distribution Facility, 1565 Industrial Parkway, Hayward

Dear Mr. O'Keefe:

This letter follows staff review of the historic fuel leak case file for the above referenced site, up to and including the April 4, 2003 Bonkowski & Associates, Inc. 1st quarter 2003 sampling and monitoring report. We are concerned that that there are elevated concentrations of residual hydrocarbons still present in soil at the site, that the extent of the contaminant plume is still largely unknown, and that the mechanisms controlling the migration of these hydrocarbons are not yet well understood or evaluated. We are also concerned that this site lies along the northern fringes of the Niles Cone groundwater basin, a groundwater basin used for municipal water supplies.

This letter presents a request to complete a three-dimensional characterization of the release by way of a Soil and Water Investigation (SWI), and completion of a Site Conceptual Model (SCM) and Corrective Action Plan (CAP) for the subject site in accordance with California Code of Regulations (CCR), Title 23, Division 3, Chapter 16, Article 11, "Corrective Action Requirements"; State Water Resources Control Board Resolution 9249, "Policies and Procedure for Investigation, Cleanup and Abatement of Discharges Under Water Code Section 13304"; and the Regional Water Quality Control Board (Regional Board) Water Quality Control Plan for the basin.

The following technical comments address investigation and related performance objectives that shall be considered as part of the required SCM, SWI, and CAP. **We request that you prepare and submit a work plan for the SWI that addresses the following comments.**

TECHNICAL COMMENTS

A substantial release of petroleum hydrocarbons was identified in 1998 from several source areas across this large contiguous site. Measurable free-phase product (FP) was first observed in an underground storage tank (UST) observation well in July 1998. This well served a tank cluster that included both gasoline and diesel USTs. Beginning in November 1998 through January 1999, nine (9) USTs were removed from five discrete locations about the site. FP was reportedly identified on groundwater encountered in all but one of the resultant UST excavations, as well as in soil encountered beneath product lines and dispensers. Multiple leak sources were identified, most significant of which were leaking product conveyance and vapor return lines and gate valve. Further, additional product lines were discovered abandoned in place during the course of this removal project, some of which were subsequently removed, while others were left in situ. These lines appear to have served a previous generation of USTs.

Up to 260,000 ug/l of the fuel oxygenate Methyl tert-Butyl Ether (MtBE) was identified in water sampled from the UST observation well prior to initiation of the 1998 closures. Initial soil samples collected at the time of UST, piping, and dispenser removals included Total Petroleum Hydrocarbons as Diesel (TPH-D) as high as 5700 mg/kg, Benzene as high as 18 mg/kg, and MtBE as high as 100 mg/kg, at depths of 12' below grade (bg). Residual soil concentrations, after substantial over excavation efforts, revealed up to 26,000 mg/kg of TPH-D, 1500 mg/kg of TPH as Gasoline (TPH-G), 26 mg/kg of Benzene, and 12 mg/kg of MtBE at depths between 8 and 17' bg.

Boring logs representing materials encountered during the September 2002 installation of seven (7) monitoring wells report sequences of sand, sandy gravel/gravelly sand, silty sand, sandy clay, and clay to total depths explored of between 25 and 32' bg. Groundwater was reportedly encountered at the time of drilling at depths of 13 – 13.5' bg in five of seven wells. Groundwater was reportedly not encountered at the time of drilling in two wells (MW-1 and MW-6) where logs report the absence of higher permeability lithologies, e.g., sand. All wells were constructed with 15 or 20' screens.

Drilling logs suggest that encountered sediments were deposited in a fluvial, or stream, environment. These depositional environments make more difficult the ability to identify the location of dissolved-phase groundwater plumes. Plumes often exploit high-permeability channel deposits typical of fluvial environments, features easily missed using "traditional" petroleum investigation techniques. Further, other subsurface features, such as utility trenches or previous subsurface construction remnants, e.g., backfilled excavations, can divert groundwater plumes in directions that might otherwise not be anticipated.

Consequently, a Preferential Pathway Study, Site Conceptual Model and Soil and Water Investigation are required to fully investigate and evaluate the releases at this site.

1. **Preferential Pathway Study**

   A conduit / preferential pathway study shall be prepared for the site that identifies potential migration pathways and conduits (utilities, storms drains, etc.) that may be present at, and in the general vicinity of, the site. This survey must include, among other components, the submittal of comprehensive map(s) clearly showing the location and depth of all utility lines and trenches identified in the study, utility/trench slope or grade, flow directions, and type of backfill materials present. You shall also identify the presence of other anthropogenic or geogenic features that may also act as potential preferential flow pathways. Data shall be interpreted and a professional opinion rendered as to whether or not any identified features may present potential plume migration pathways.

   You shall also identify the presence of all wells within a ½ mile radius of the site (i.e., monitoring and production wells; active, inactive, standby, destroyed, abandoned). Include a listing of all wells within this radius, their use and status, date of completion, total depth and screen interval(s), as well as a map showing their locations relative to the site.

Using the results of the conduit / preferential pathway study and other data discussed, below, you are to develop the initial three-dimensional *Site Conceptual Model* (SCM) of site conditions. You are to use this initial SCM to determine the appropriate configuration for sampling points in the pending SWI phase of work at this site. Discuss your analysis and interpretation of the results of the conduit studies and explain your rationale for the configuration of sampling points in the SWI work plan.

2. Site Conceptual Model

Starting with a critical review of the conduit / preferential pathway studies, data from previous investigations and tank operational records for this site, as well as those derived from logs of supply wells within ¼ mile of the site, followed by an evaluation of regional and area-specific geology and hydrogeology based on published U.S. Geological Survey and California Geological Survey reports, as well as other reports published for public works or other projects in the general vicinity of the site, you are to develop the initial three-dimensional SCM of site conditions. You should include in the SCM a series of cross-sections drawn along transects both normal and parallel to the anticipated groundwater flow direction to illustrate your interpretation of underlying geology, the locations of utility corridors and trenches, and other salient features.

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, among other possible topics to be considered. 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).

Your attention is directed to *"Strategies for Characterizing Subsurface Releases of Gasoline Containing MtBE"*, American Petroleum Institute Publication No. 4699 dated February 2000 as a resource for development of the SCM. Your attention is also directed 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, as well as the June 2002 ChevronTexaco Energy Research and Technology Company technical bulletin entitled *"Mass Flux Estimates to Assist Decision-Making"* to help in development and strategies for refinement of the SCM, among other related tasks. I can provide copies of any of these documents if you need them.

You are requested to use this initial SCM and referenced guidance documents to help you determine the appropriate configuration for samplings points in the pending SWI phase of work at this site. Please discuss in the SWI work plan your analysis and interpretation of the results of the conduit study and SCM, and explain your rationale for the configuration of proposed sampling points.

3. Contaminant Plume Definition

Further assessment is necessary to better understand site geology and hydrogeology, determine the mode of contaminant transport from the source areas, and to refine the SCM. We therefore request a three-dimensional investigation. Vertical and horizontal distribution of impacts is to be determined. Multiple transects of sampling points across and along the (anticipated) plume axes are anticipated. The SWI work plan, the scope of which should be substantially based on the completed SCM, shall present your plan to accomplish these tasks.

Conventional investigation techniques and monitoring well networks currently used at fuel leak sites are generally insufficient to adequately characterize modern fuel impacts, including those caused by MtBE and other oxygenates. It is recommended that your investigation initially incorporate expedited site assessment techniques and borings. The borings are to be continuously cored and logged, with close attention paid to changes in lithologies that might facilitate solute transport (e.g., silty/sandy stringers in otherwise fine grained sediments).

In general, soil samples should be collected for laboratory analysis at 5-foot intervals, areas of obvious contamination, the soil/groundwater interface, and at each lithologic change noted during boring advancement, at a minimum. Water samples are to be collected at discrete depths to total depth explored. Detailed cross-sections, fence diagrams, structural contours and isopachs, and rose diagrams for groundwater flow (incorporating all groundwater data), should be subsequently incorporated into the SWI report. Cross-sections should be scaled to clearly illustrate subsurface lithologies, including the locations of stringers and other zones of relatively higher permeability, particularly in those areas where such zones may be intercepted by buried utilities.

Final well locations and screen depths will be substantially based on the results of the SWI and refined SCM. The monitoring of multiple discrete water-bearing zones with short-screened intervals should be anticipated in most cases, and is fully dependent upon what is found during the SWI. Generally, these screened intervals should not be greater than 3' in length. We will expect that the Interim SWI Report will propose the locations of such wells, the anticipated well screen depths, their configurations (e.g., single well, well cluster or multi-level, as appropriate), and the reasoning behind the location and configuration of each.

Discuss your proposal for performing this work outlined, above, in the SWI work plan. The results of the conduit studies and the initial SCM are to be discussed in the SWI work plan to justify your proposed scope of work.

Expedited site assessment tools and methods are a scientifically valid and cost-effective approach to fully define the three-dimensional extent of the plume. 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.

4. **Corrective Action Plan**

The purpose of the CAP is to use the information obtained during investigation activities to propose cost-effective final cleanup objectives and remedial alternatives for both soil and groundwater impacts, including those caused by MtBE and other fuel oxygenates, that will adequately protect human health and safety, the environment, eliminate nuisance conditions, and protect water resources.

A final CAP for the soil and groundwater impacts caused by an unauthorized release(s) at the site will be requested upon completion of the SWI and final SCM in accordance with the schedule specified below. The CAP shall address at least two technically and economically feasible methods to restore and protect beneficial uses of water and to meet the cleanup objectives for each contaminant established in the CAP. The CAP should incorporate both on-site and distal plume corrective action elements. The CAP must propose verification monitoring to confirm completion of corrective actions and evaluate CAP implementation effectiveness.

TECHNICAL REPORT REQUEST

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

December 6, 2003 – Work plan for Soil and Water Investigation

December 6, 2003 - Site Conceptual Model (incorporating Preferential Pathway Study)

60 Days from SWI Work Plan Approval – Interim Soil and Water Investigation Report (which contains the results of the initial SWI assessment work, and a proposal for the installation of new monitoring wells)

90 Days from Completion of Soil and Water Investigation – Soil and Water Investigation Completion Report (which incorporates all data generated during completion of the SWI, both initial and subsequent phases, including the installation of the new monitoring wells)

90 Days after Submittal of Soil and Water Investigation Completion Report - Corrective Action Plan

October 15, 2003 – Quarterly Reports for 2nd and 3rd Quarters 2003

January 15, 2004 – Quarterly Report for the Fourth Quarter 2003

April 15, 2004 – Quarterly Report for the First Quarter 2004

July 15, 2004 – Quarterly Report for the Second Quarter 2004

October 15, 2004 – Quarterly Report for Third Quarter 2004

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 consider referring your case to the Regional Board or other appropriate agency, including the Alameda County District Attorney, for possible 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 6.76.

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

Sincerely,

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

c: Betty Graham, RWQCB
Dave Charter, SWRCB UST Fund
Danilo Galang, Hayward Fire Department
Steven Inn, Alameda Co. Water District
Cynthia Dittmar, Bonkowski & Associates, Inc.
6400 Hollis St., Ste. 4, Emeryville, CA 94608
D. Drogos

ALAMEDA COUNTY
HEALTH CARE SERVICES
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DAVID J. KEARS, Agency Director

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STID 1408

September 10, 2001

Mr. Terri Penny
Operation Coordinator
Golden Gate Petroleum
501 Shell Avenue
Martinez, CA 94553

Re: Hayward Cardlock, 1565 Industrial Parkway West, Hayward, CA

Dear Mr. Terri:

I am in receipt of "Site Investigation Workplan" dated May 31, 2001 along with an amendment dated 9/4/01 by Ms. Cynthia Dittmar of Bonskowski & Associates Inc. regarding the above referenced site.

I have reviewed the above documents and discussed the issues with Ms. Dittmar of Bonskowski & associates Inc. Your proposal is acceptable. However, the location of wells must be properly situated to reveal quarterly groundwater status accurately per my discussion with Ms. Dittmar.

The number of monitoring well installations might be added to seven due to the site of the lot, the way former tanks were situated, and proper collection of water samples. As you are aware there was a high degree of contamination at this site, including some Separate Phase Hydrocarbons (SPH), of which 49,700 gallons have been removed so far. The analytical results of the water samples, in the past, had revealed up to 140,000 parts per billion (ppb) TPHG, 1520ppb benzene, 230ppb ethylbenzene, 250ppb toluene, 220ppb total xylenes, and 260,000ppb MTBE. The analytical results of the soil samples, in the past, had identified up to 100,000 ppm MTBE, 980ppm TPHG, 5,700ppm TPHD, and 18,000ppb, 1,800ppb, 27,000ppb, 54,000ppb levels of BTEX respectively.

However you may reduce the number of monitoring well installations if you can ensure this reduction in monitoring well installation will not cause insufficient information regarding plume definition and or misrepresentation of actual groundwater status during sampling and analysis.

Additionally, I understand that you will include a well and sensitive receptor survey will be performed as well.

Please be advised that the City of Hayward will oversee any work relating to the 1998 UST upgrade requirements. However, this office will oversee any contaminated soil or groundwater that is generated from this work.

Should you have any questions or comments, please contact me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

CC: Ms. Cynthia Dittmar, Bonskowski & Associates Inc., 6400 Hollis Street, Suite 4, Emeryville, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES
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DAVID J. KEARS, Agency Director

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Stid 1408

May 7, 2001

Mr. Terri Penny
Operation Coordinator
Golden Gate Petroleum
501 Shell Avenue
Martinez, CA 94553

Re: Required investigations at Hayward Cardlock, 1565 Industrial Parkway West, Hayward, CA

Dear Mr. Terri:

This office has tried to make contact with your company's representative regarding several Underground Storage Tanks (USTs), which were removed in 1998 from the above referenced site. Having talked to Mr. Kevin Cline and others of Golden Gate Petroleum, I realized that your company's office has moved to Martinez and Mr. Harvey Brook left the company about a year ago. However, as you are aware, after the UST removal, there were several soil and grab groundwater samples, collected from the site, which revealed existence of contaminants due to unauthorized release from the former USTs. The groundwater and soil samples were analyzed for Total Petroleum Hydrocarbons as Gasoline (TPHG), Methyl Tertiary Butyle Ether (MTBE), benzene, toluene, ethylbenzene, and total xylenes (BTEX). The analytical results of the water samples revealed up to 140,000 parts per billion (ppb) TPHG, 1520ppb benzene, 230ppb ethylbenzene, 250ppb toluene, 220ppb total xylenes, and 260,000ppb MTBE. The analytical results of the soil samples identified up to 100,000 ppm MTBE, 980ppm TPHG, 5,700ppm TPHD, and 18,000ppb, 1,800ppb, 27,000ppb, 54,000ppb levels of BTEX respectively.

I understand that you were unaware of correspondences by this office due to change in office address as well as the departure of Mr. Brook. However, it is imperative that you comply with the requirements set forth by this office. Per Article 11, Division 3, Chapter 16, Title 23 of the California Code of Regulations, **you are required to conduct a Preliminary Site Assessment (PSA) to determine the lateral and vertical extent and severity of soil and groundwater contamination, which has resulted from the release at the site.** The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. **The major elements of such an investigation, include, but are not limited to, the following:**

- At least one groundwater monitoring well must be installed within 10 feet of the observed soil contamination, oriented in the confirmed downgradient direction relative to groundwater flow. In the absence of data identifying the local confirmed downgradient direction, a minimum of three wells will be required to verify gradient direction. During the installation of these wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology.

- Subsequent to the installation of the monitoring wells, these wells must be surveyed to an established benchmark (mean sea level, MSL), with an accuracy of 0.01 foot. Groundwater samples are to be collected and analyzed quarterly.

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. All reports and proposals must be submitted under a seal of a California –Registered Geologist, -Certified Engineering Geologist, or – Registered Civil Engineer.

The PSA proposal is due within 60 days of date of this letter by July 7, 2001. Once the proposal is approved, fieldwork should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this office approves a change in sampling frequency or the site qualifies for closure. Such quarterly reports are due the first day of the second month of each subsequent quarter.

The referenced initial and quarterly reports must describe the status of the investigation and must include, among others, the following elements:

- Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- Status of groundwater contamination characterization
- Interpretations of results: water level contour maps showing gradients, free and dissolved product, plume definition maps for each target component, geologic cross sections, etc.
- Recommendations or plans for additional investigative work or remediation

Additionally, Per my discussion with Ms. Cynthia Dittmar of Bonskowski & Associates previously, you are required to include a well survey and address the known domestic well(s).

The City of Hayward will oversee any work relating to the 1998 UST upgrade requirements. However, this office will oversee any contaminated soil or groundwater that is generated from this work.

The State Water Resources Control Board manages an Underground Storage Tank Cleanup Fund (Fund) to help eligible Responsible Parties to obtain reimbursement for costs of investigating and remediating releases from petroleum underground storage tanks. You are encouraged to apply. To obtain an Application Package, contact the Fund at the following:

State Water Resources Control Board
Division of Clean Water Programs
UST Cleanup Fund
P.O. Box 944212
Sacramento, CA 944212
Telephone: (916)227-4307

You are also advised to contact Cheryl Gordon at (916)-227-4539 with any questions regarding State Trust fund.

Please be advised that this is a formal request for a work plan pursuant to Section 2722(e)(d) of Title 23 California Code of Regulations. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

Please respond to above by May 21, 2001, otherwise a Notice of Violation.

If you have any questions or comments, please contact me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

CC: Ms. Cynthia Dittmar, Bonskowski & Associates Inc., 6400 Hollis Street, Suite 4, Emeryville, CA 94608
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ALAMEDA COUNTY
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AGENCY
DAVID J. KEARS, Agency Director

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(510) 337-9335 (FAX)

September 7, 1999

STID 1408

Mr. Harvey Brooke
Golden Gate Petroleum
1001 Galaxy Way, Suite 308
Concord, CA 94520

RE: Golden Gate Petroleum, 1565 Industrial Pkwy West, Haywawrd, CA 94544

Dear Mr. Brooke:

I received a phone call from your consultant, Ms. Cynthia Dittmar of Bonskowski & Associates Inc regarding the letter I sent you on August 16th, 1999 and the landlord notification and participation law. As indicated in that letter this law pertains 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.

I included two sample letters, "Sample Letter 2" and "Sample Letter 3" with some instructions for you.

Enclosed please find a copy of the law regarding the above requirement.

Please call me at (510) 567-6876 if you have any questions.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

c: Ms. Cynthia Dittmar, Bonskowski & Associates Inc., 6400 Hollis Street, Suite 4, Emeryville, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES
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DAVID J. KEARS, Agency Director

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(510) 337-9335 (FAX)

Stid 1408

August 24, 1999

Mr. Harvey Brook
Golden Gate Petroleum
1001 Galaxy Way
Concord, CA 94520

Re: Required investigations at Hayward Cardlock, 1565 Industrial Parkway West, Hayward, CA

Dear Mr. Brook:

As you are aware, several Underground Storage Tanks were removed in 1998 from the above referenced site. Soil samples were collected from the site. The groundwater and soil samples were analyzed for Total Petroleum Hydrocarbons as Gasoline (TPHG), Methyl Tertiary Butyle Ether (MTBE), benzene, toluene, ethylbenzene, and total xylenes (BTEX). Analysis results of the water samples identified up to 140,000 parts per billion (ppb) TPHG, 1520ppb benzene, 230ppb ethylbenzene, 250ppb toluene, 220ppb total xylenes, and 260,000ppb MTBE. Analysis results of the soil samples identified up to 100,000 ppm MTBE, 980ppm TPHG, 5,700ppm TPHD, and 18,000ppb, 1,800ppb, 27,000ppb, 54,000ppb levels of BTEX respectively.

Per Article 11, Division 3, Chapter 16, Title 23 of the California Code of Regulations, **you are required to conduct a Preliminary Site Assessment (PSA) to determine the lateral and vertical extent and severity of soil and groundwater contamination, which has resulted from the release at the site.** The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. **The major elements of such an investigation, include, but are not limited to, the following:**

- At least one groundwater monitoring well must be installed within 10 feet of the observed soil contamination, oriented in the confirmed downgradient direction relative to groundwater flow. In the absence of data identifying the local confirmed downgradient direction, a minimum of three wells will be required to verify gradient direction. During the installation of these wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology.

- Subsequent to the installation of the monitoring wells, these wells must be surveyed to an established benchmark (mean sea level, MSL), with an accuracy of 0.01 foot. Groundwater samples are to be collected and analyzed quarterly.

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. All reports and proposals must be submitted under a seal of a California –Registered Geologist, -Certified Engineering Geologist, or – Registered Civil Engineer.

The PSA proposal is due within 60 days of date of this letter by March 9, 1999. Once the proposal is approved, fieldwork should commence within 60 days. A report must be submitted

within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this office approves a change in sampling frequency or the site qualifies for closure. Such quarterly reports are due the first day of the second month of each subsequent quarter.

The referenced initial and quarterly reports must describe the status of the investigation and must include, among others, the following elements:

- Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- Status of groundwater contamination characterization
- Interpretations of results: water level contour maps showing gradients, free and dissolved product, plume definition maps for each target component, geologic cross sections, etc.
- Recommendations or plans for additional investigative work or remediation

Additionally, Per my discussion with Ms. Cynthia Dittmar of Bonskowski & Associates, you are required to include a well survey and address the known domestic well(s).

The City of Hayward will oversee any work relating to the 1998 UST upgrade requirements. However, this office will oversee any contaminated soil or groundwater that is generated from this work.

The State Water Resources Control Board manages an Underground Storage Tank Cleanup Fund (Fund) to help eligible Responsible Parties to obtain reimbursement for costs of investigating and remediating releases from petroleum underground storage tanks. You are encouraged to apply. To obtain an Application Package, contact the Fund at the following:

State Water Resources Control Board
Division of Clean Water Programs
UST Cleanup Fund
P.O. Box 944212
Sacramento, CA 944212
Telephone: (916)227-4307

You are also advised to contact Cheryl Gordon at (916)-227-4539 with any questions regarding State Trust fund.

Please be advised that this is a formal request for a work plan pursuant to Section 2722(c)(d) of Title 23 California Code of Regulations. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

If you have any questions or comments, please contact me at (510) 567-6876.

R0160

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

CC: Ms. Cynthia Dittmar, Bonskowski & Associates Inc., 6400 Hollis Street, Suite 4, Emeryville, CA 94608
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ALAMEDA COUNTY
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RO160

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August 16, 1999

STID 1408

Mr. Harvey Brooke
Golden Gate Petroleum
1001 Galaxy Way, Suite 308
Concord, CA 94520

RE: Golden Gate Petroleum, 1565 Industrial Pkwy West, Haywawrd, CA 94544

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Brooke:

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, you have 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.

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.

In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

1) consider a cleanup proposal (corrective action plan)

2) consider a site closure proposal

3) make a determination that no further action is required

4) issue a closure letter

You may use the enclosed "notice of proposed action" form (sample letter 3) as a template to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

Please call me at (510) 567-6876 if you have any questions about the content of this letter.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB

Attachments: Sample letter 2 and Sample letter 3, which must be filled out by the Responsible Party and mailed to Alameda County.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Director

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

R0160

Telephone Number: (415) 271-4320

September 2, 1988

Tony Mindling
Staff Hydrogeologist
Dames and Moore
9300 Tech Center Dr., Suite 100
Sacramento, CA 95826

Dear Mr. Mindling:

This is in response to your request of August 31,1988, to our Division of Hazardous Materials for a search of our records for the area of 500 to 2000 Industrial Parkway West, Hayward, for information on underground tanks in that area. A call was placed to Ms. Cynthia Cabral, on Thursday and no response was received concerning other information you may need. The following list of companies on file with this Department is given for your info.

500	Industrial Parkway West	BART
727	Industrial Parkway West	Toomey's Truck and Diesel
877	Industrial Parkway West	Parkway Auto Body
978	Industrial Parkway West	Bay Ford Tractor
1069	Industrial Parkway West	Chi-Rock Salvage
1111	Industrial Parkway West	A-1 Septic Tank
1421	Industrial Parkway West	R.B. Mathews
1557	Industrial Parkway West	Aaron's Body Shop
(R0160) 1565	Industrial Parkway West	Holdener Petroleum Co.
1571	Industrial Parkway West	Ed's Repair and Machine
1571	Industrial Parkway West	C.& G. Enterprises
1581	Industrial Parkway West	California Brake & Clutch
1581	Industrial Parkway West	Smith and Dannison
1593	Industrial Parkway West	C & G. PM Service
1593	Industrial Parkway West	R. & R. Oil Distributors

Each of these companies is registered with our Division as a Hazardous Waste Generator, having less than 100 Kg. per month of Hazardous Waste.

This letter is limited to information available to this Department and does not reflect other information which may be accessible to other agencies or businesses involved with this property.

If you have any questions, please contact Edgar Howell, Program Administrator at 415 - 271-4320.

Sincerely,

Rafat A. Shahid, Chief
Hazardous Materials Program

RAS:mnc

Enclosure (1)

cc: File
Edgar B. Howell