

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



01-15-02

RO000191

January 14, 2002

Mr. Keith Simas  
Xtra Oil  
2307 Pacific Avenue  
Alameda, CA 94501

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

**NOTICE OF VIOLATION / NON-COMPLIANCE**

Dear Mr. Simas:

On May 9, 2001, the Alameda County Department of Environmental Health, Hazardous Materials Division, sent you letter approving a work plan for the installation of a vapor extraction and air sparging system at 1701 Park Avenue, Alameda, CA. Based on the plan's implementation schedule, the system was to be in operation by December 2001. As of the date of this letter, however, it appears you are only in the permitting stage and at least 200 days behind schedule. Therefore, this letter constitutes a **Second Notice** that you are in violation of specific laws and that the work plan must be implemented immediately.

According to Section 25298 of the California Health and Safety Code, underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge. Therefore, you, as the responsible party, are in violation of this section of the Code, for which Section 25299 specifies civil penalties of up to \$5,000, for each day of violation.

You are required to submit monthly report of progress in installing the remediation system. The system must be in operation by **May 1, 2001**. Failure to respond may result in referral of this case to the RWQCB or Alameda County District Attorney to consider for enforcement action. Non-compliance will also jeopardize your eligibility to remain in the UST Cleanup Fund.

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

A handwritten signature in black ink, appearing to read 'eva chu', written in a cursive style.

eva chu  
Hazardous Materials Specialist

email: Susan Torrence, Alameda County DA's Office  
Sunil Ramdass, Cleanup Fund

xtraoilNOV

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



9-14-01

RO0000191

September 13, 2001

Mr. Keith Simas  
Xtra Oil  
2307 Pacific Avenue  
Alameda, CA 94501

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

**RE: Work Plan Implementation at 1701 Park St., Alameda, CA**

Dear Mr. Simas:

On August 17, 2001 I requested confirmation that the engineering design and permitting phase for the installation of a remediation system was completed. To date I have not received word from you to confirm that you are on schedule in implementing remedial action at the site. Also, by now, pre-construction activities should be completed. Please confirm by **September 28, 2001** that engineering design and permitting and pre-construction activities have been completed at the site. Equipment installation should be underway.

Be advised, failure to be in compliance with corrective action directives may jeopardize your eligibility to remain in the UST Cleanup Fund. If you have any questions, I can be reached at (510) 567-6762.

eva chu  
Hazardous Materials Specialist

email: Brady Nagle  
Sunil Ramdass, UST Cleanup Fund

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



8-20-01  
ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

RO0000191

August 17, 2001

Mr. Keith Simas  
Xtra Oil  
2307 Pacific Avenue  
Alameda, CA 94501

**RE: Work Plan Implementation Schedule Update for 1701 Park St, Alameda, CA**

Dear Mr. Simas:

In May 9, 2001, I approved Alisto Engineering Group's April 2001 *Work Plan for Remediation System Installation*, prepared for the above referenced site. Included in the workplan was an implementation schedule. Upon 90 days after the work plan was approved, the engineering design and permitting phase was to be completed. Please confirm that that phase of planning has been completed in writing within 14 days of the date of this letter, or **by August 31, 2001**. At this time, pre-construction activities should be underway.

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

eva chu  
Hazardous Materials Specialist

c: Brady Nagle, Alisto, 3732 Mt. Diablo Blvd, Suite 270, Lafayette, CA 94598  
Sunil Ramdass, UST Cleanup Fund

xtraoil19

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



05-10-01

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

✓ RO0000191

May 9, 2001

Mr. Keith Simas  
Xtra Oil  
2307 Pacific Avenue  
Alameda, CA 94501

**RE: Workplan Approval for Additional Investigatin at 1701 Park Street, Alameda, CA**

Dear Mr. Simas:

I have completed review of Alisto Engineering Group's April 2001 *Work Plan for Additional Investigation* prepared for the above referenced site. The proposal to advance three hand-auger borings to further assess the horizontal extent of petroleum hydrocarbons in groundwater is acceptable. Soil and groundwater samples should be analyzed for TPHd, as well as TPHg, BTEX, and MTBE. And select samples will also be analyzed for fuel oxygenates using EPA Method 8260. The workplan should be implemented within 60 days of the date of this letter, or by **July 11, 2001**.

Based on data collected from this phase of investigation, permanent groundwater monitoring well locations will be sited.

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

eva chu  
Hazardous Materials Specialist

c: Brady Nagle, Alisto, 3732 Mt. Diablo Blvd, Suite 270, Lafayette, CA 94598  
Hari Patel, SWRCB-Cleanup Fund

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



05-10-01

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

RO0000191

May 9, 2001

Mr. Keith Simas  
Xtra Oil  
2307 Pacific Avenue  
Alameda, CA 94501

**RE: Workplan Approval for Remediation System at 1701 Park Street, Alameda, CA**

Dear Mr. Simas:

I have completed review of Alisto Engineering Group's April 2001 *Work Plan for Remediation System Installation* prepared for the above referenced site. The use of the proposed vapor extraction and air sparging system to remediate petroleum hydrocarbons in groundwater is acceptable. Please make efforts to expedite implementation of the remediation system. I feel that there have already been too many delays to get to this point. The fuel release was initially identified in July 1994. In the meantime, the contaminant plume has migrated at least 120 feet off-site to impact groundwater at the Exxon site at 1725 Park Street.

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

eva chu  
Hazardous Materials Specialist

c: Brady Nagle, Alisto, 3732 Mt. Diablo Blvd, Suite 270, Lafayette, CA 94598  
Hari Patel, SWRCB-Cleanup Fund

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



04-2401

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

✓ R00000191

April 18, 2001

Mr. Keith Simas  
Xtra Oil  
2307 Pacific Avenue  
Alameda, CA 94501

**RE: QMR for 1701 Park Street, Alameda, CA**

Dear Mr. Simas:

On March 27, 2001 I received a quarterly monitoring report (QMR) from you that was dated April 27, 1999. It was obvious that the wrong QMR was submitted and I requested that the report documenting groundwater monitoring which took place on or about October 2000 be sent for our review. To date I have not received the report. Please submit the fourth quarter 2000 QMR within 10 days of the date of this letter.

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

A handwritten signature in black ink, appearing to read 'eva chu', written in a cursive style.

eva chu  
Hazardous Materials Specialist

c: Brady Nagle, Alisto, 1575 Treat Blvd., Suite 201, Walnut Creek, CA 94598  
Hari Patel, SWRCB-UST Cleanup Fund

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



03-02-01

20191

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

StID 3836

March 1, 2001

Mr. Ted Simas  
Xtra Oil  
2307 Pacific Avenue  
Alameda, CA 94501

**RE: Air Sparge/Vapor Extraction Workplan for 1701 Park Street, Alameda, CA**

Dear Mr. Simas:

I have completed review of Alisto Engineering's February 2001 *Remedial Investigation Report* prepared for the above referenced site. A pilot air sparge and vapor extraction test was conducted at the site in October 2000. Based on the results of the test, it appears that the combination of air sparge and vapor extraction would be effective to remediate residual hydrocarbons in the subsurface.

At this time, please submit a workplan detailing the air sparge and vapor extraction treatment unit planned for use at the site. The workplan is due within 45 days of the date of this letter, or by **April 18, 2001**. In addition, a workplan to delineate the extent of the contaminant plume is past due.

**Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.**

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

eva chu  
Hazardous Materials Specialist

c: Brady Nagle, Alisto, 1575 Treat Blvd., Suite 201, Walnut Creek, CA 94598  
Hari Patel, SWRCB-UST Cleanup Fund

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



01-24-01

20191

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

StID 3836

January 23, 2001

Mr. Ted Simas  
Xtra Oil  
2307 Pacific Avenue  
Alameda, CA 94501

**RE: Air Sparge Test Report and Workplan for 1701 Park Street, Alameda, CA**

Dear Mr. Simas:

On October 13, 2000, an air sparge pilot test was conducted at the above referenced site. To date, this office is not in receipt of a report documenting the results of the air sparge test. Please be advised that technical reports should be submitted in a timely manner, usually within 60 days upon completion of field activities.

Also, in June 7, 2000, I requested a workplan to delineate the extent of the MTBE plume to the northeast, east and southeast of the site. This workplan was due by August 11, 2000. As of the date of this letter, this office is not in receipt of the required workplan.

The above referenced reports are due within 15 days of the date of this letter, or by **February 9, 2001**. Failure to be in compliance with corrective action directives may jeopardize your eligibility to remain in the UST Cleanup Fund.

**Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.**

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

eva chu  
Hazardous Materials Specialist

c: Brady Nagle, Alisto, 1575 Treat Blvd., Suite 201, Walnut Creek, CA 94598  
Mark Owens, SWRCB-UST Cleanup Fund



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



10-6-00

RO# 191

October 5, 2000

STID 3836

Ted Simas  
Xtra Oil Company  
2307 Pacific Avenue  
Alameda, CA 94501

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

### NOTICE OF VIOLATION

Re: Inspection of Xtra Oil Company dba Shell Station, 1701 Park Street, Alameda

Dear Mr. Simas:

A regulatory compliance inspection was performed at the subject facility on September 28, 2000. A representative of Central Petroleum facilitated the inspection. The purpose of the inspection was to determine compliance with conditions of the facility underground storage tank (UST) operating permit, as well as provisions of Title 23, California Code of Regulations (CCR) and California Health and Safety Code (HSC) Chapter 6.7.

The following is a summary of non-compliant and other conditions noted at the time of the inspection:

- Product filled one or more float trip mechanism amplifier wells within the Bravo dispenser containment below 4 of 8 dispensers at the facility; in each case, none of the shear valves were triggered, as connector chains for float trip mechanisms were too loose
- Chains connecting float trip mechanisms to shear valves within each Bravo dispenser containment box were too loose to trigger shear valves in the event of a release
- Bravo dispenser containment boxes were dirty
- A leaky filter was discovered dripping beneath dispenser # 7 / 8
- Leak detector sensor was located on the wrong side of the STP sumps of the 89 and 92 product tanks
- Debris and dirt were accumulated in the overflow buckets of the each product tank
- Phil-tite overflow bucket for the diesel product tank was not properly secured to or sealed against its steel man-way cover mounting flange
- Surface gaskets of many of the steel access covers were damaged or missing
- One cam-lock for the diesel STP sump lid was missing
- Hold-down bolts of many of the steel access covers were missing or broken
- None of the front indicator lights of the Gilbarco EMC tank monitoring panel functioned

Mr. Simas  
Re: 1701 Park Street, Alameda  
October 5, 2000  
Page 2 of 4

Four of eight Bravo dispenser containment boxes showed evidence of product releases. Product was present in the float trip mechanism amplifier wells. Although the floats were buoyed by the accumulated product, none of the shear valves were triggered, as the chains connecting the float trip mechanisms were too loose.

Loose float trip mechanism chains, as well as nonfunctioning Gilbarco panel lights, were also identified during the July 1999 and November 1998 inspections of the facility. During the 1998 inspection, substantial product was accumulated in one of the Bravo containment boxes, and, yet, the shear valves did not trigger due to loose chains. This problem appears to be a recurring theme, and renders this component of your UST monitoring program out of compliance with the conditions of your permit.

As you are aware, the Gilbarco EMC monitoring panel allows for the print-out of an "alarm history" of the tank monitoring system. Only the three most recent alarm events for each of the 6 used channels are so printed. An alarm history report was printed during the 9/28/00 inspection. Review of this report reveals that none of the sensors appear on the print-out on dates in 1998 and 1999 that your monitoring system testing contractor, Tanknology, was reportedly at the site to recertify your monitoring system. Barring a software problem with the Gilbarco panel, this appears to demonstrate that the sensors were not inspected and tested in the normal and expected fashion. Should you have a possible explanation for these apparent anomalies, please present it.

Several violations of provisions of HSC have been identified, as follows:

- HSC Sec. 25293 – The operator of the underground tank system shall monitor the tank system using the method specified on the permit for the tank system. Records of monitoring.....shall be kept in sufficient detail to enable the local agency to determine whether the underground tank system is in compliance with the applicable provisions of [HSC Chapter 6.7], the regulations....., and the permit issued for the operation of the tank system.

Loose chains on the Bravo containment float trip mechanisms rendered the dispensers unmonitored for an unknown period of time. This item violates a condition of your permit to operate the tank system at this site.

- HSC Sec. 25294 – Any unauthorized release from the primary containment which the operator is able to cleanup within 8 hours after the release was detected *or should reasonably have been detected*, and which does not escape from the secondary containment.....shall be recorded on the operator's monitoring reports.

Releases into the Bravo dispenser containment were neither cleaned up nor (apparently) recorded.

Mr. Simas  
Re: 1701 Park Street, Alameda  
October 5, 2000  
Page 3 of 4

- HSC Sec. 25294(a)(1) – Any unauthorized release... [that] increases the hazard or fire or explosion... shall be reported by the operator to the local agency .... within 24 hours after the release had been detected *or should have been detected*. A full written report shall be transmitted to the local agency within 5 days.

Product releases into the Bravo dispenser containment were neither cleaned up nor reported.

Please be advised that HSC Sec. 25299(a) provides for civil liabilities imposed on the tank operator of up to \$5000 per tank per day per violation for:

- (2) Violation of any applicable requirement of the permit
- (3) Failure to maintain records
- (4) Failure to report an unauthorized release
- (6) Violation of any applicable requirements of HSC Chapter 6.7
- (7) Failure to perform any monitoring, testing, and reporting

Please be further advised that HSC Sec. 25299(b) provides for civil liabilities imposed on the tank owner of up to \$5000 per tank per day per violation for:

- (4) Knowing failure to take reasonable and necessary steps to assure compliance with HSC Chapter 6.7 by the operator
- (5) Violation of any applicable requirement of the permit
- (6) Violation of any applicable requirements of HSC Chapter 6.7
- (7) Failure to perform any monitoring, testing, and reporting

At this time, you are required to correct the tank system operation, maintenance, and management violations identified in this inspection report, namely:

- Correct the operation and maintenance problems identified during the 9/28/00 inspection and as articulated in this report

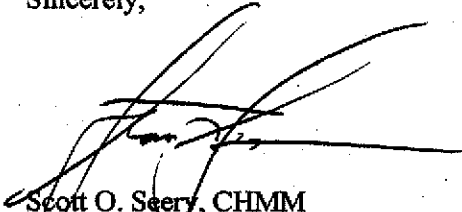
Pursuant to HSC Sec. 25288(d), you are required to submit a *Plan of Correction* **within 60 days**. This plan shall indicate the tasks to be completed, or those that have been completed already, and the schedule for doing so.

You must certify, once all the necessary repairs and other tasks have been completed, that the tank system is in full compliance with HSC Chapter 6.7 and UST regulations, as, pursuant to HSC Sec. 25285(b), this agency cannot issue or renew the UST permit until we determine the UST system is in full compliance. We recommend, therefore, that you contract your own inspector to ensure that this requirement is met, and to provide the appropriate level of quality control that you will likely need to make this certification.

Mr. Simas  
Re: 1701 park Street, Alameda  
October 5, 2000  
Page 4 of 4

Please contact me at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott O. Seery", written over a horizontal line.

Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Mike O'Connor, Alameda County District Attorney's Office  
Tom Peacock, ACDEH  
Robert Weston, ACDEH

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT 6-7-2000  
incl cc's

2091

StID 3836

June 7, 2000

Mr. Ted Simas  
Xtra Oil  
2307 Pacific Avenue  
Alameda, CA 94501

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

**RE: CAP Implementation and Plume Delineation at 1701 Park Street, Alameda, CA**

Dear Mr. Simas:

I have completed review of Alisto Engineering Group's May 2000 *Groundwater Monitoring and Sampling Report* prepared for the above referenced site. Groundwater in Well MW-2 continues to show a sheen or thin layer of floating product. Up to 26,000ppb TPHg, 200,000ppb TPHd 4,000ppb benzene and 13,000ppb MTBE was identified this last sampling quarter.

One of the purposes of this letter is to get an update from you on the status of the implementation of the Corrective Action Plan (CAP). This office approved a CAP and it was to be implemented by February 7, 2000. I have not received notification that this work has been completed. Failure to be in compliance with corrective action directives may jeopardize your eligibility to remain in the UST Cleanup Fund.

At this time, you are also required to delineate the contaminant plume to the northeast, east and southeast of the site. A workplan for this phase of investigation is due within 60 days of the date of this letter, or by **August 11, 2000**.

Lastly, groundwater from Well MW-2 should be analyzed for MTBE and other oxygenates (using Method 8260) as well as PNAs in the next sampling event,

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

eva chu  
Hazardous Materials Specialist

c: Brady Nagle, Alisto, 1575 Treat Blvd., Suite 201, Walnut Creek, CA 94598  
Mark Owens, SWRCB-UST Cleanup Fund, P.O.Box 944212, Sacramento, CA  
94244-2120

xtraoil13

Sent 12/3/99  
Including ccs

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

20191

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6700  
(510) 337-9432

StID 3836

December 3, 1999

Mr. Ted Simas  
Xtra Oil  
2307 Pacific Avenue  
Alameda, CA 94501

**RE: Corrective Action Plan (CAP) Approval for 1701 Park Street, Alameda, CA**

Dear Mr. Simas:

I have completed review of Alisto Engineering Group's October 1999 report titled *Corrective Action Plan* prepared for the above referenced site. The CAP evaluated alternative remedial technologies to address residual hydrocarbons in soil and groundwater beneath the site. Air sparging and vapor extraction with thermal treatment was selected as the remedial action plan of choice. A vapor extraction pilot test and an air sparging pilot test will be conducted to confirm the effectiveness of this remedial technology. Based on results of the pilot testing, additional vapor extraction/air sparging wells may be warranted for the final system design.

The proposed remedial action plan selected for the site is acceptable. The vapor extraction pilot test should be conducted within 60 days of the date of this letter, or **by February 7, 2000**. The air sparging pilot test should be conducted shortly thereafter. Please notify this office at least 72 hours prior to the start of field activities.

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

eva chu  
Hazardous Materials Specialist

c: Brady Nagle, Alisto, 1575 Treat Blvd., Suite 201, Walnut Creek, CA 94598

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Rolan

StID 3836

September 29, 1999

Mr. Ted Simas  
Xtra Oil  
2307 Pacific Avenue  
Alameda, CA 94501

ENVIRONMENTAL HEALTH SERVICES

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

**SECOND NOTICE OF VIOLATION**

Dear Mr. Simas:

On June 30, 1999, the Alameda County Department of Environmental Health, Hazardous Materials Division, sent you a letter requesting a corrective action plan (CAP) for the site located at **1701 Park Street, Alameda, CA**. The CAP, at the minimum, should include: assessment of the impact of petroleum hydrocarbons at the site and adjacent vicinity, feasibility study of remedial alternatives, applicable cleanup levels, characteristics of the contaminants, hydrogeology of the site, and cost-benefit analysis evaluating remedial alternatives. As of the date of this letter, however, we have not received a CAP for the site. Therefore, this letter constitutes a **Second Notice** that you are in violation of specific laws and that the technical report is due.

According to Section 25298 of the California Health and Safety Code, underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge. Therefore, you, as the responsible party, are in violation of this section of the Code, for which Section 25299 specifies civil penalties of up to \$5,000, for each day of violation, upon conviction. Also, failure to furnish technical reports regarding documented or potential groundwater contamination violates Section 13267(b) of the California Water Code. The Regional Water Quality Control Board (RWQCB) can impose civil penalties of up to \$1,000 per day that such a violation continues.

You are required to submit the technical report for the site **within 15 days** from the date of this letter. Be advised that failure to be in compliance with corrective action directives may jeopardize your eligibility to remain in the UST Cleanup Fund.

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

eva chu  
Hazardous Materials Specialist

c: Brady Nagle, Alisto, 1575 Treat Blvd., Suite 201, Walnut Creek, CA  
Mark Owens, SWRCB-UST Cleanup Fund, P.O.Box 944212, Sacramento, CA  
94244-2120

xtraoil11

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO191

August 30, 1999

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

Mr. Keith Simas  
Operations Manager  
Xtra Oil Company  
2307 Pacific Avenue  
Alameda, CA 94501

**Subject: Operating permit for three underground storage tanks,  
located at 1701 Park Street, Alameda CA 94501**

Dear Mr. Simas:

The installed system at the above location includes three - double wall steel fiberglass clad tanks. Tank leak detection is performed using a Gilbarco monitoring panel with associated probes and sensors. The pressurized piping is double wall fiberglass utilizing a sump on each tank to act as the containment for the piping.

All components of the fuel delivery system are continuously monitored for leaks. The electronic monitor is configured to alarm as a result of a product detection. Flow of gasoline from the dispensers will shut-down if liquid is detected in the dispenser containment pans.

Compliance with the following conditions is a requirement of the permit to operate:

1. Perform leak detection using the sensors and monitoring system as described above.
2. Maintain written records of all alarm conditions and their resolution.
3. Perform annual operational tests on the electronic monitoring equipment by qualified technicians. The month of **April** is the anniversary for the certification. Submit a copy of the certificate to this office, within 30 days of the tests. Maintain records of all maintenance performed on the tank system.
4. **Annually** perform operational tests on the pressurized piping. The piping shall be tested at 150% of nominal operating pressure with a release threshold of 0.1 gallon



Xtra Oil Company  
1701 Park Street  
August 30, 1999  
page 2 of 2

per hour. The mechanical line leak detector performance shall be confirmed to detect a release equivalent to 3.0 gallons per hour at 10 psi. Each year submit a copy of the report to this office, within 30 days of the tests.

5. Maintain a copy of the five year operating permit and operating conditions on-site.
6. Complete employee training and document such training at least annually.
7. Report unauthorized releases to this office within 24 hours of discovery. Provide written reports within 5 working days.
8. All changes in monitoring equipment must be pre-approved by this office prior to implementation.
9. Report changes in facility operator or tank owner within 30 days of the change.
10. Maintain certification of financial responsibility with documentation on-site.

This permit expires on August 29, 2004. If you have any questions regarding the operation of this tank system please contact me at (510) 567-6781.

Sincerely,



Robert Weston  
Sr. Hazardous Materials Specialist

enclosures

c: Tom Peacock, ACDEH  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

R0791

StID 3836

June 30, 1999

Mr. Ted Simas  
Xtra Oil  
2307 Pacific Avenue  
Alameda, CA 94501

ENVIRONMENTAL HEALTH SERVICES

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

**RE: CAP for 1701 Park Street, Alameda, CA**

I have completed review of the case file for the above referenced site. When four fuel underground storage tanks were removed in April 1994, it was obvious that the tanks had contributed to soil and groundwater contamination at the site. On-site groundwater monitoring wells were installed to delineate the extent of the plume. Quarterly groundwater monitoring commenced in November 1994. Data collected to date confirm that the plume has migrated off-site. In addition, Well MW-2 has contained free product.

At this time, pursuant to provisions of Section 2720 et seq. of Article 11, *Corrective Action Requirements*, Title 23, California Code of Regulations (CCR), a corrective action plan (CAP) must be developed for this site. During the development stages of a CAP, several issues must be taken into account, including, among others, the following:

- assessment of the impacts
- feasibility study of remedial alternatives
- applicable cleanup levels
- characteristics of the contaminants
- hydrogeology of the site
- cost-benefit analysis evaluating remedial alternatives

Your attention is directed to Article 11 of 23 CCR for the specific requirements and elements of a CAP.

The requested CAP is due within 60 days of the date of this letter, or by **September 1, 1999**. If you have any questions, I can be reached at (510) 567-6762.

eva chu  
Hazardous Materials Specialist

xtraoil10

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#191

StID 3836

April 27, 1998

Mr. Ted Simas  
Xtra Oil  
2307 Pacific Ave  
Alameda, CA 94501

ENVIRONMENTAL HEALTH SERVICES

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

**SECOND NOTICE OF VIOLATION**

Dear Mr. Simas:

On January 5, 1998, the Alameda County Department of Environmental Health, Hazardous Materials Division, sent you a letter requesting a workplan which would evaluate human health risk at the adjacent property due to the unauthorized release of fuel products at 1701 Park Street, Alameda, CA. The workplan was due by February 20, 1998. Your consultant requested an extension for the submittal of the workplan. A verbal extension of the deadline to March 31, 1998 was granted. As of the date of this letter, however, we have not received the required workplan or any communication from you on this matter. Therefore, this letter constitutes a **Second Notice** that you are in violation of specific laws and that the technical report is due.

According to Section 25298 of the California Health and Safety Code, underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge. Therefore, you, as the responsible party, are in violation of this section of the Code, for which Section 25299 specifies civil penalties of up to \$5,000, for each day of violation, upon conviction. You are required to submit the technical reports for the site to this office **within 15 days** from the date of this letter. **Failure to respond will result in referral of this case to the RWQCB or Alameda County District Attorney to consider for enforcement action. Modification of required tasks or extensions of stated deadlines must be confirmed in writing by either this agency or the RWQCB.**

Be advised that failure to be in compliance with corrective action directives may jeopardize your eligibility to remain in the UST Cleanup Fund.

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

eva chu  
Hazardous Materials Specialist

c: Cheryl Gordon, UST Cleanup Fund  
xtraoil-8

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO# 191

StID 3836

January 5, 1998

Mr. Ted Simas  
Xtra Oil  
2307 Pacific Ave  
Alameda, CA 94501

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

**RE: Risk Analysis for 1701 Park Street, Alameda, CA**

Dear Mr. Simas:

Since the confirmation of a fuel release due to the former underground storage tanks at the above referenced site, four groundwater monitoring wells have been installed onsite to evaluate the extent and severity of the hydrocarbon contamination in groundwater. The most recent sampling event, September 1997, identified up to 19,000ppb benzene in well MW-1 and 2,000ppb benzene in well MW-4.

At this time an evaluation must be made to determine if the adjacent downgradient properties are exposed to any health risk due to petroleum hydrocarbons in groundwater. Such an analysis may be in the form of an ASTM Risk Based Corrective Action evaluation and/or a soil gas vapor study can be performed using Summa canisters. A workplan for this next phase of investigation is due to this office within 45 days of the date of this letter or by February 20, 1998.

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

eva chu  
Hazardous Materials Specialist

c: Brady Nagle, Alisto, 1575 Treat Blvd, #201, Walnut Creek, CA  
94598  
Cheryl Gordon, UST Cleanup Fund

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Ro# 191

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

StID 3836

March 17, 1997

Mr. Ted Simas  
2307 Pacific Ave  
Alameda, CA 94501

**RE: Workplan Approval for 1701 Park Street, Alameda, CA**

Dear Mr. Simas:

I have completed review of Alisto's March 1997 Revised Work Plan for Additional Site Characterization for the above referenced site. The proposal to install one additional groundwater monitoring well and a soil boring to collect soil for various physical parameters is acceptable. It is recommended that the monitoring well be installed in the planter area but not greater than 60' from the Park Street curb so data from this well would be more representative of contaminants which may be migrating offsite and possibly under the adjacent liquor store/residence.

Field work should commence within 30 days of the date of this letter, or by April 17, 1997. Please provide at least 72 hours notice in advance of field activities so that I may be present to observe the work.

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

eva chu  
Hazardous Materials Specialist

c: Brady Nagle, Alisto, 1575 Treat Blvd, Suite 201, Walnut Creek,  
CA 94598

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0#191

StID 3836

March 10, 1997

Mr. Ted Simas  
Xtra Oil Co  
2307 Pacific Ave  
Alameda, CA 94501

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

**RE: Additional Monitoring Well for 1701 Park St, Alameda, CA**

Dear Mr. Simas:

In November 1996 I met with Mr. Keith Simas at the above referenced site to determine possible locations of additional groundwater monitoring wells. To date I am not in receipt of a revised site plan detailing the location and installation of the proposed well(s). The workplan is due to this office **by March 21, 1997**. The workplan should also include the collection of a soil sample from the capillary fringe of a "clean" boring and tested for the following parameters: a) total organic carbon content, b) bulk density, c) water content, and d) porosity. Once the workplan is approved you have 30 days to install the monitoring well(s).

I have completed review of Alisto's February 1997 Groundwater Monitoring and Sampling Report. Analysis of groundwater from well MW-2 identified low levels of PNAs. To delineate the extent of PNAs, groundwater from well MW-1 should also be analyzed for PNAs in future sampling events.

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

eva chu  
Hazardous Materials Specialist

c: Brady Nagle, Alisto, 1575 Treat Blvd, Suite 201, Walnut Creek  
CA 94598

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#191

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

StID 3836

November 13, 1996

Mr. Ted Simas  
Xtra Oil Co  
2307 Pacific Ave  
Alameda, CA 94501

**RE: PNAs Analysis for 1701 Park Street, Alameda, CA 94501**

Dear Mr. Simas:

I have completed review of Alisto Engineering Group's October 1996 Groundwater Monitoring and Sampling Report for the above referenced site. This report summarized the results of groundwater sampling which took place on September 23, 1996. Well MW-2 still contained approximately 0.01 feet of floating product. And well MW-1 contained elevated levels of TPHg, BTEX, and TPHd.

During the next sampling event, groundwater from well MW-2 should also be analyzed polynuclear aromatic hydrocarbons (PNAs), using Method 8270.

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

eva chu  
Hazardous Materials Specialist

c: Brady Nagle  
Alisto Engineering  
1575 Treat Blvd, Suite 201  
Walnut Creek, CA 94598

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0191

RAFAT A. SHAHID, Assistant Agency Director

StID 3836

November 13, 1995

Mr. Ted Simas  
Xtra Oil Co  
2307 Pacific Ave  
Alameda, CA 94501

Alameda County  
Environmental Protection Division  
1131 Harbor Bay Parkway, Room 250  
Alameda CA 94502-6577  
(510) 567-6700

**SECOND NOTICE OF VIOLATION**

Dear Mr. Simas:

On January 27, 1995, the Alameda County Department of Environmental Health, Hazardous Materials Division, sent you a letter requesting technical reports detailing the work to be performed to determine the extent of soil and water contamination on- and offsite due to the unauthorized release of fuel products at 1701 Park Street, Alameda, CA. As of the date of this letter, however, we have not received a workplan from you for this phase of the investigation. Therefore, this letter constitutes a Second Notice that you are in violation of specific laws and that the technical report is due.

According to Section 25298 of the California Health and Safety Code, underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge. Therefore, you, as the responsible party are in violation of this section of the Code, for which Section 25299 specifies civil penalties of up to \$5,000, for each day of violation, upon conviction. Also, failure to furnish technical reports regarding documented or potential groundwater contamination violates Section 13267(b) of the California Water Code. The Regional Water Quality Control Board (RWQCB) can impose civil penalties of up to \$1,000 per day that such a violation continues.

You are required to submit the technical reports for the site to this office within 30 days from the date of this letter, or by **December 13, 1995**. If you have any questions, I can be reached at (510) 567-6762.

eva chu  
Hazardous Materials Specialist

cc: <sup>7/10</sup> files (xtraoil.2)



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



green copy

RO# 191

RAFAT A. SHAHID, Assistant Agency Director

StID 3836

January 27, 1995

Mr. Ted Simas  
Xtra Oil Co  
2307 Pacific Ave  
Alameda, CA 94501

ALAMEDA COUNTY-ENV. HEALTH DEPT.  
ENVIRONMENTAL PROTECTION DIV.  
1131 HARBOR BAY PKWY., #250  
ALAMEDA CA 94502-6577  
(510)567-6700

**RE: Continued Investigation at 1701 Park St, Alameda 94501**

Dear Mr. Simas:

I have completed review of Alisto Engineering Group's January 1995 Preliminary Site Assessment Report for the above referenced site. This report documents the completion of three onsite monitoring wells and groundwater sampling. It appears the cross and downgradient wells detected elevated levels of petroleum hydrocarbons and floating product. At this time, a quarterly groundwater monitoring schedule should be implemented for this site. The next sampling event should be in February 1995.

Also, additional investigations are required to delineate the extent of soil and groundwater contamination on- and off-site, resulting from the unauthorized release of fuel products from the former underground storage tanks. A workplan for this investigation is due to this office within 60 days of the date of this letter, or **by March 31, 1995**. Be advised, that an offsite investigation should include a search of utility trenches which may act as preferential pathways for the migration of contaminants.

And, please provide documentation of free product disposal when available. If you have any questions, I can be reached at (510) 567-6762.

A handwritten signature in cursive script, appearing to read "eva chu".

eva chu  
Hazardous Materials Specialist

cc: files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO 191

RAFAT A. SHAHID, Assistant Agency Director

December 16, 1994  
STID # 3836

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

Mr. Edward Simas and Carol Simas  
Owner/Operator  
Xtra Oil Company  
2301 Pacific Ave.  
Alameda, California 94501

Re: FIVE YEAR UNDERGROUND STORAGE TANK PERMIT AT,  
XTRA OIL COMPANY SHELL 1701 PARK STREET, ALAMEDA, CALIFORNIA  
94501

Dear Mr. and Ms. Simas:

Enclosed is your five year permit to operate a total of three underground storage tanks at the above referenced facility. These tanks are double-walled with fiberglass coating. Their associated piping is also double-walled, with fiberglass secondary piping.

To operate under a valid permit, you are required to comply with the conditions in Title 23 of the California Code of Regulations (CCR). Based on these requirements, both tanks and piping are monitored by a Veeder-Root 350 (TLS) electronic alarm system.

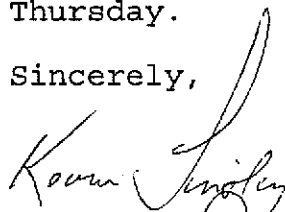
A review of your file revealed that the Hazardous Materials Management Plan submitted is inadequate. In addition, the plan fails to describe the monitoring plan and spill response procedures to the detail required by section 2634, article 3 of Title 23 of the California Code of regulations. Therefore this Agency requires you to submit an up to date Hazardous Materials Management plan, Tank Monitoring plan and Spill Response plan within 30 days from the date of this letter (attached are blank plans which can be returned completed to meet these requirements). Your permit to operate is approved conditional upon the submission of your plans. Failure to comply will result in suspension or revocation of your permit.

You may consult the revised Title 23, CCR for additional requirements. To obtain a copy of the regulations, you may contact the State Water Resources Control Board at (916) 227-4303.

Page 2 of 2  
Simas  
December 16, 1994

If you have any questions regarding the permit to operate, do not hesitate to contact me at (510) 271-4320, Monday through Thursday.

Sincerely,



Kevin Tinsley  
Hazardous Materials Specialist

c, Edgar Howell, Chief - files (kt)  
Larry Seto, Senior Hazardous Materials Specialist  
Gil Jensen, Alameda County District Attorney's Office,  
Consumer Affairs Division

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0191

RAFAT A. SHAHID, Assistant Agency Director

August 22, 1994

Mr. Edward Simas  
Xtra Oil Co.  
2307 Pacific Ave.  
Alameda, CA 94501

Alameda County CC 4580  
Health Care Services Agency  
Dept. Of Environmental Health  
1131 Harbor Bay Pkwy 2nd Flr.  
Alameda, CA 94502-6577

STID 3836

Re: Work plan for investigations at 1701 Park St., Alameda, CA

Dear Mr. Simas,

This office has reviewed Alisto Engineering Group's (Alisto) work plan, dated August 15, 1994, addressing the installation and sampling of three monitoring wells at the above site. This work plan is acceptable to this office with the following additional requirements/reminders:

- o Wells must be screened adequately above the water table to account for seasonal fluctuations;
- o Wells must be surveyed to Mean Sea Level; and
- o Per Article 5 Title 23 California Code of Regulations, you are required to continue quarterly ground water monitoring and reporting until this site qualifies for case closure. Additionally, monthly water level measurements and corresponding gradient determinations will be required for the first three months, and then quarterly thereafter.

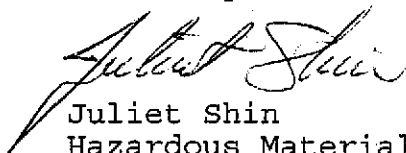
Additionally, elevated levels of soil contamination have been left in place at the site. It is the understanding of this office that the proposed monitoring wells will also be used to assist in delineating the extent of the observed soil contamination. Please be reminded that remediation of this insitu soil contamination will eventually need to be addressed in conjunction with the delineation, containment, and remediation of the ground water contaminant plume.

Lastly, this office has no information on the sampling results for or fate of the excavated soil resulting from the tank removals. You are required to submit this information to this office **within 30 days of the date of this letter.**

If you have any questions or comments, please contact me at (510) 567-6763.

Mr. Edward Simas  
Re: 1701 Park St.  
August 22, 1994  
Page 2 of 2

Sincerely,

A handwritten signature in cursive script, appearing to read "Juliet Shin".

Juliet Shin  
Hazardous Materials Specialist

cc: Brady Nagle  
Alisto Engineering Group  
1777 Oakland Blvd., Ste 200  
Walnut Creek, CA 94596

Edgar Howell

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0191

StID 3836

July 1, 1994

Mr. Edward Simas  
Xtra Oil Co  
2307 Pacific Ave  
Alameda, CA 94501

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

**Subject: PSA for Xtra Oil, 1701 Park St, Alameda, 94501**

Dear Mr. Simas:

When four fuel underground storage tanks (UST) were removed from the above referenced site, floating product was noted on groundwater in the pit. The backfilled material was obviously stained with and smelled of fuel product. Clearly an unauthorized release of fuel products has occurred at this site.

To date, this office is not in receipt of laboratory analysis results of soil and groundwater samples collected at the time of the UST removal. Please submitted a report summarizing the closure of the four UST to this office by July 17, 1994. Our new address is at 1131 Harbor Bay Parkway, 2nd Floor, Alameda, CA 94501. Future reports should be sent to that address.

Additional investigations are also require, at this time, to delineate the extent and severity of soil and groundwater contamination at this site. Such an investigation shall be in the form of a **Preliminary Site Assessment, or PSA**. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, and Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached Appendix A.

The PSA proposal is due within 45 days of the date of this letter, or by August 17, 1994. Once the proposal is approved, field work should commence within 45 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 site qualifies for RWQCB "sign off." All reports and proposals must be submitted under seal of a California Registered Geologist, Certified Engineering Geologist, or Registered Civil Engineer.

Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.

Mr. Edward Simas  
re: PSA for 1701 Park St, Alameda  
July 1, 1994

Page 2

Should you have any questions about the content of this letter,  
please contact me at (510) 271-4330. Eventually we will have new  
phone numbers at our new office.

Sincerely,



eva chu  
Hazardous Materials Specialist

cc: files

xtrao11.1

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0191

RAFAEL A. SHAWD, Assistant Agency Director

December 28, 1993

CERTIFIED MAILER #: P 386 338 249

Xtra Oil Co. Db a Shell Oil  
1701 Park St.  
Alameda, 94501  
UGTID:3836

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

**Re: FIVE-YEAR PERMITS FOR OPERATION OF UNDERGROUND STORAGE TANK(S)  
1701 Park St. Alameda, 94501**

Dear Owner/Operator:

According to our records your facility referenced above has not received a five-year permit to operate UST's. In order to obtain a permit you must complete the following items marked below and return them within 30 DAYS. The necessary forms are enclosed. You may complete a "Consolidated Underground Tank Management Plan" which will assist you in preparing a monitoring plan, site plot plan and spill response plan for your tank(s). If supplemental information or forms are required, please submit it to this office with the completed questionnaire and application forms:

- \_\_\_ 1. An accurate and complete plot plan.
- \_\_\_ 2. A written spill response plan. (enclosed)
- \_\_\_ 3. A written tank monitoring plan. (enclosed)
- \_\_\_ 4. Results of precision tank test(s), (initial and annual).
- \_\_\_ 5. Results of precision pipeline leak detector tests (initial and annual).
- \_\_\_ 6. Complete UST PERMIT FORM A-one per facility. (enclosed)
- \_\_\_ 7. Complete UST PERMIT FORM B-one per tank. (enclosed)
- \_\_\_ 8. Complete UST PERMIT FORM C-one per tank if information is available. (enclosed)
- \_\_\_ 9. Letter stating how the tank is to be maintained during one year closure.

Be advised that Title 23 of the California Code of Regulation prohibits the operation of "ANY" UST without a permit. If our records are in error, you must contact this office immediately TO AVOID POSSIBLE ENFORCEMENT ACTION. Please feel free to contact this office at (510) 271-4320; to answer any questions which may arise in completing the mandatory five-year permit process. Be prepared to provide your zip code to speak with the Hazmat Specialist handling your case.

Sincerely,

*Cynthia Manji for LARRY SETO.*

LARRY SETO  
Sr HazMat Specialist

c: Edgar Howell, Chief, Hazardous Materials Div. (files)



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0191

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

June 1, 1993

Mr. Dan Kirk  
Shell Oil Company  
P.O. Box 5278  
Concord, CA 94520

Re: The Shell Service station at 1701 Park Street, Alameda, CA

Dear Mr. Kirk,

Consultants for the Exxon Service Station at 1725 Park Street in Alameda recently conducted an Offsite Ground water Survey to characterize the ground water contaminant plume resulting from their site in September 1992. Borings were placed downgradient, upgradient, and crossgradient from their site and ground water grab samples were collected and analyzed for petroleum hydrocarbon contamination. In the process, the highest levels of hydrocarbon contamination was identified upgradient/cross-gradient from their site and downgradient of your site (Please refer to attached copies of boring locations and concentrations identified).

In response to these results, Exxon retained consultants to conduct an Off-site Source Investigation in May 1993. Their conclusion from this investigation was that there were two possible sources for the elevated levels of ground water contaminant concentrations upgradient of their site: German Auto Service at 1719 Park Street, and your facility at 1701 Park Street.

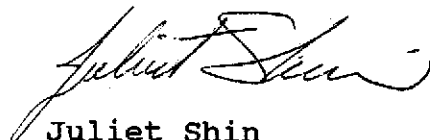
Per the Regional Water Quality Control Board's (RWQCB) Staff Recommendations for the Initial Evaluation and Investigation of Underground Storage Tanks, a preliminary survey has been conducted of the area in response to this "nuisance", and your site has been cited as a potential source of this "nuisance". Per RWQCB's guidelines, you are required to conduct ground water investigations at the site to determine whether your site is the cause or a contributor of the observed contamination.

You are required to submit a work plan within 60 days of the date of this letter, addressing these required ground water investigations. Files on the off-site surveys conducted by Exxon's consultants are available for review.

Mr. Dan Kirk  
Re: 1701 Park St.  
June 1, 1993  
Page 2 of 2

If you have any questions or comments, please contact me at (510)  
271-4530.

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Edgar Howell-File(JS)