

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

RO0000209

June 21, 2004

Mr. L.B. Patel  
Mr. P. Gupta  
385 Century Circle  
Danville, CA 94526

**Re: VIP Service, 3889 Castro Valley Boulevard, Castro Valley – Request for Feasibility Study**

Dear Messrs. Patel and Gupta:

We are in receipt and have completed review of the case file for the subject site, up to and including the P&D Environmental (P&D) document entitled "*Corrective Action Plan*" dated November 26, 2002. The cited P&D document presents a summary of the case and an assessment of impacts associated with the release from the underground storage tanks (UST) formerly located at the subject site. The P&D document also briefly describes the feasibilities of three (3) potential corrective action measures: excavation; vapor extraction; and, combination of vapor extraction, air sparging, and ground water pumping.

Please submit a detailed feasibility study evaluating a minimum of two (2) corrective action alternatives for remedying or mitigating adverse impacts caused by the UST release, including those to ground water and potential risks to residential receptors in proximity to the site. The feasibility study shall include, among other components, a cost-benefit analysis of each alternative contemplated. Both soil and ground water corrective action elements are to be considered, particularly as they relate to reducing or eliminating the contribution of pollutant mass to ground water from the source zone.

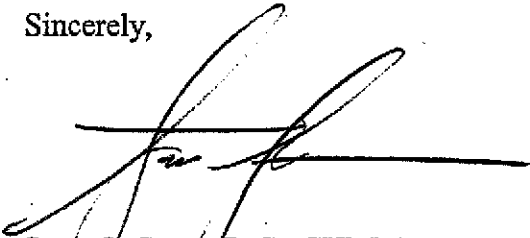
Your attention is directed to U.S. EPA document EPA 510-B-94-003, "*How to Evaluate Alternative Cleanup Technologies for Underground Storage Tank Sites*", for detailed guidance on evaluating the cost and feasibility of corrective action alternatives.

Please submit your Feasibility Study within 60 days of the date of this letter.

Messrs. Patel and Gupta  
Re: 3889 Castro Valley Blvd. Castro valley  
June 21, 2004  
Page 2 of 2

I may be reached at 510/567-6783 should you have any questions.

Sincerely,

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

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

C: Betty Graham, RWQCB  
Dave Charter, SWRCB UST Fund  
Paul King, P&D Environmental, 4020 Panama Ct., Oakland, CA 94611

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



9-502

September 4, 2002

RO 209

Mr. L.B. Patel  
Mr. P. Gupta  
VIP Service  
385 Century Circle  
Danville, CA 94526

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
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FAX (510) 337-9335

RE: VIP Service, 3889 Castro Valley Boulevard, Castro Valley – Request for Corrective Action Plan

Dear Messrs. Patel and Gupta:

We have reviewed the case file for the referenced site, including the most recent technical reports *Groundwater Monitoring and Sampling Report*, dated November 2, 2001, *Groundwater Monitoring and Sampling Report*, dated July 8, 2002, and *Subsurface Investigation Report (P16-P27)*, dated July 2, 2002, all prepared by P&D Environmental. Of particular note are the results of the latest phase of the multi-phase Soil and Water Investigation (SWI) documented in the cited *Subsurface Investigation Report*. This latest SWI phase better defined the 3-dimensional extent of soil and water contamination, both at the subject site and on the adjoining property immediately to the west of the former tank complex (3495 Castro Valley Blvd.).

You are hereby requested to prepare a Corrective Action Plan (CAP) for this case in accordance with provisions of the California Code of Regulations, Title 23, Division 3, Chapter 16, Article 11, "Corrective Action Requirements".

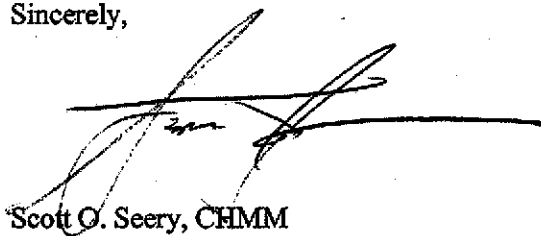
The purpose of the CAP is to use the information obtained during the investigation phases of the project to propose cost-effective final cleanup objectives for the entire contaminant plume, and remedial alternatives for soil and groundwater that will adequately protect human health and safety, the environment, eliminate nuisance conditions, and protect water resources. The CAP shall address at least two (2) technically- and economically-feasible methods to meet the cleanup objectives for each contaminant of concern established in the CAP. The CAP must propose verification monitoring to confirm completion of corrective actions and evaluate CAP implementation effectiveness. This may or may not involve the construction of additional monitoring wells.

The CAP is due within 60 days of the date of this letter.

Messrs. Patel and Gupta  
Re: 3889 Castro Valley Blvd., Castro Valley  
September 4, 2002  
Page 2 of 2

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", is written over a horizontal line. The signature is stylized and cursive.

Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB  
Sunil Ramdass, SWRCB UST Fund  
Paul King, P&D Environmental, 4020 Panama Ct., Oakland, CA 94611

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



06-19-01

R0209

June 18, 2001

STD 1710

Mr. L.B. Patel  
Mr. P. Gupta  
VIP Service  
385 Century Circle  
Danville, CA 94526

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
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FAX (510) 337-9335

RE: VIP Service, 3889 Castro Valley Boulevard, Castro Valley

Dear Messrs. Patel and Gupta:

Thank you for our receipt of the June 1, 2001 subsurface investigation workplan prepared by P&D Environmental (P&D). This workplan, received by this office on June 13, 2001, proposes the installation of 12 soil borings using GeoProbe® technology. Both soil and groundwater samples will be collected from each continuously-cored borehole.

The cited P&D workplan is accepted as submitted. Please be certain that the report documenting this work includes a series of geologic cross-sections that show the locations of soil borings, sample locations and depths, sample contaminant concentrations, and breaks in topography.

Please contact me at (510) 567-6783 should you have any questions and to inform when field work is slated to begin.

Sincerely,

Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB  
Paul King, P&D Environmental, 4020 Panama Ct., Oakland, CA 94611

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



04-18-07

20209

April 16, 2001

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

STID 1710

Mr. L.B. Patel  
Mr. P. Gupta  
VIP Service  
385 Century Circle  
Danville, CA 94526

RE: VIP Service, 3889 Castro Valley Boulevard, Castro Valley

Dear Messrs. Patel and Gupta:

This letter is sent in follow-up to the April 13, 2001, meeting with Chuck Headlee, California Regional Water Quality Control Board, San Francisco Bay region (RWQCB), and Paul King, P&D Environmental, your environmental consultant. This meeting was convened to discuss the results of the multi-phase environmental, conduit, and sensitive receptor investigations, the outcome of the Tier II Risk-Based Corrective Action (RBCA) evaluation, and the next appropriate steps towards development of a Corrective Action Plan (CAP).

The RWQCB and this office determined that an additional soil investigation is necessary to estimate the residual hydrocarbon mass within and proximal to the source area, including areas of the adjoining residential (trailer court) property located immediately to the west. This information is necessary to appropriately contemplate and evaluate potential remedial alternatives for the CAP. We anticipate that the CAP will include some form of active remediation, as well as the installation of several more monitoring wells in locations downgradient of the site.

At this time, please have your consultant prepare and submit a workplan for the referenced soil investigation. This workplan is due within 45 days of the date of this letter.

Please contact me at (510) 567-6783 should you have any questions.

Sincerely,

  
Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB  
Paul King, P&D Environmental, 4020 Panama Ct., Oakland, CA 94611

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT 6-12-2000  
mld cc's

20209

June 8, 2000

STID 1710

Mr. Howard E. Heller  
Kin Properties, Inc.  
77 Tarrytown Road, Ste. 100  
White Plains, NY 10607-1620

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

RE: VIP Service, 3889 Castro Valley Boulevard, Castro Valley, Alameda County, California

Dear Mr. Heller:

This letter is sent in response to your letter dated June 6, 2000 in which you inquired about the status of the environmental investigation and affiliated tasks associated with the subject site as it relates to the property located at 3836 Castro Valley Boulevard, located across Castro Valley Boulevard from the subject site.

As you may recall from our previous conversations, the focus of our attention in this case has been, and will continue to be, the residential properties located west and northwest of the subject site. These properties represent the predominant area below which the gasoline plume is located. Consequently, it is associated with these same residential properties where a health risk evaluation has been further pursued, as residents of these numerous dwellings represent the most sensitive, potential receptor population.

The large, asphalt-covered parking lot at 3836 Castro Valley Boulevard has not been within the scope of our concern with respect to a risk-based corrective action evaluation. Hence, no further work has been conducted in the area adjacent to that property, nor is any expected in the future based on the current facts of this case. It is unknown whether that property has been impacted and, if so, to what extent.

For your information, a soil gas investigation report has recently been received. I understand that this report documents the results of a soil gas survey conducted within and/or adjacent to the cited residential properties in an attempt to determine the presence of potential vapor migration pathways.

I trust this information satisfies your inquiry. I may be reached at (510) 567-6783 should you have any further questions.

Sincerely,

  
Scott O. Seery, CHMM  
Hazardous Materials Specialist

c: Ariu Levi, Chief, Environmental Protection

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SNT 4-3-2000  
inld cc's

20209

April 3, 2000

STID 1710

Mr. L.B. Patel  
Mr. P. Gupta  
VIP Service  
385 Century Circle  
Danville, CA 94526

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

RE: Receptor Evaluation - VIP Service, 3889 Castro Valley Boulevard, Castro Valley

Dear Messrs. Patel and Gupta:

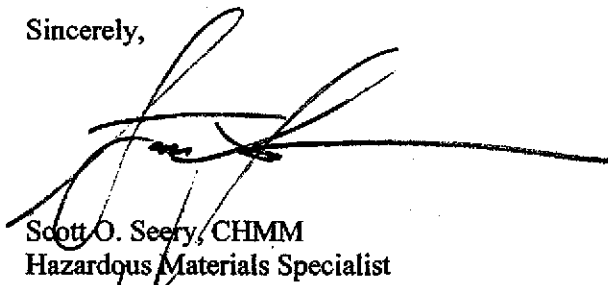
This letter is sent to request a written update on the status of the off-site utility investigation planned for locations along both Castro Valley Boulevard and Aspen Avenue. This work was originally proposed by P&D Environmental (P&D) in their report entitled "*Potential Receptor Evaluation Report*", the scope of which was accepted by this office in correspondence dated July 21, 1999.

In addition, it has come to my attention that regular sampling and monitoring reports appear not to have been submitted to this office since our receipt of the P&D report dated March 9, 1998. Reports beyond that date are not in the case file for this project. The missing reports (i.e., remainder of 1998 and all of 1999) are to be submitted.

The missing reports and written status update are to be submitted within 15 days of the date of this letter.

Please contact me at (510) 567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: ✓ Chuck Headlee, RWQCB  
Paul King, P&D Environmental, 4020 Panama Ct., Oakland, CA 94611



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Ro# 209

July 21, 1998

STID 1710

Mr. L.B. Patel  
Mr. P. Gupta  
VIP Service  
385 Century Circle  
Danville, CA 94526

ENVIRONMENTAL HEALTH SERVICES

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

RE: Receptor Evaluation – VIP Service, 3889 Castro Valley Boulevard, Castro Valley

Dear Messrs. Patel and Gupta:

I have completed review of the May 20, 1998 P&D Environmental (P&D) report entitled "*Potential Receptor Evaluation Report*." This report documents, among other tasks, efforts to evaluate: 1) foundation construction of structures located downgradient of the subject site; and, 2) whether buried utility trenches (e.g., sanitary sewer lines, etc.) could provide potential preferential pathways for the dispersal of contaminants away from the subject site and towards potential receptor populations outside the mapped plume boundaries.

The cited P&D report recommends further evaluation of the sanitary sewer trenches where such appear to be at depths below expected occurrence of groundwater. P&D recommends the collection of vapor samples from sanitary sewer trenches beneath both Aspen Avenue and Castro Valley Boulevard, and where the sewer line enters three structures on these two streets. In addition, PG&E electrical, EDMUD water, and telephone trenches will also be evaluated where they enter the one Castro Valley Boulevard structure.

The recommended additional pathway evaluation is acceptable. However, please add the following task to the proposed scope of work: groundwater samples should also be collected from the sewer trenches if it is encountered. Target compounds shall be typical for gasoline analyses (TPH-G, BTEX, MtBE).

Please contact me when fieldwork is scheduled to begin. I may be reached at (510) 567-6783.

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Mee Ling Tung, Director, Environmental Health  
Chuck Headlee, RWQCB  
Paul King, P&D Environmental

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 209

February 2, 1998

ENVIRONMENTAL HEALTH SERVICES

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700

(510) 337-9335 (FAX)

STID 1710

Mr. L.B. Patel  
Mr. P. Gupta  
VIP Service  
385 Century Circle  
Danville, CA 94526

RE: VIP SERVICE, 3889 CASTRO VALLEY BOULEVARD, CASTRO VALLEY

Dear Messrs. Patel and Gupta:

This letter is sent in follow-up to the meeting I had on January 29, 1998 with your consultant, Paul King, P&D Environmental. During our meeting, Mr. King and I discussed the current status of the risk-based corrective action (RBCA) evaluation, and the next appropriate steps towards its completion.

We concurred that the best approach, now that we have identified the receptor locations most proximal to your site for which the greatest potential for complete exposure pathways exist, will include the following:

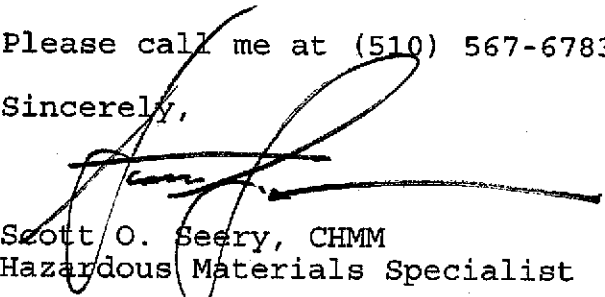
- 1) Evaluate the construction specifications (e.g., foundations, utility line access, crawl space ventilation, etc.) of these potential receptor sites to determine if such are conducive to completion of vapor pathways;
- 2) Evaluate depths of utility alignments leading past or away from, or in proximity to, your site to determine if such are conducive to vapor transmission;
- 3) Determine whether other potential receptor populations may be identified based on the results of Items 1 and 2, above; and,
- 4) Propose sites for the collection of direct soil vapor survey (SVS) samples reflective of the locations of all potential receptor populations.

Please have your consultant submit these data within 60 days of the date of this letter.

Messrs. Patel and Gupta  
RE: 3889 Castro Valley Blvd., Castro Valley  
February 2, 1998  
Page 2 of 2

Please call me at (510) 567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Mee Ling Tung, Director  
Stephen Hill, RWQCB  
Arron Rambach, SWRCB, UST Cleanup Fund  
Paul King, P&D Environmental

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 209

September 26, 1997

STID 1710

Mr. L.B. Patel  
Mr. P. Gupta  
VIP Service  
385 Century Circle  
Danville, CA 94526

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

RE: VIP SERVICE, 3889 CASTRO VALLEY BOULEVARD, CASTRO VALLEY -  
STATUS OF RISK-BASED CORRECTIVE ACTION EVALUATION

Dear Messrs. Patel and Gupta:

In correspondence from this office dated November 8, 1996 you were requested to perform a risk-based corrective action (RBCA) evaluation as a consequence of the underground storage tank (UST) releases from the referenced site. Part of this evaluation was to include a survey of utility corridors proximal to the site to determine the potential such may have for contributing to the dispersal of fuel vapors and contaminated ground water towards receptor populations.

Additionally, this office is in receipt of a State Water Resources Control Board (SWRCB) letter dated February 3, 1997 granting "pre-approval" for costs associated with this work.

To date, we have not been informed as to the results of the RBCA evaluation for your UST site.

Please respond within 15 days of the date of this letter by either 1) submitting the published report documenting the results of the RBCA, or 2) a letter indicating the current status of this project and schedule for its completion.

Please contact me at 510/567-6783 should you have any questions regarding the content of this letter.

Sincerely,

  
Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Mee Ling Tung, Director  
Kevin Graves, RWQCB  
Arron Rambach, SWRCB, UST Cleanup Fund  
Paul King, P&D Environmental

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RO # 209

November 8, 1996

STID 1710

Mr. L.B. Patel  
Mr. P. Gupta  
VIP Service  
385 Century Circle  
Danville, CA 94526

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

RE: VIP SERVICE, 3889 CASTRO VALLEY BOULEVARD, CASTRO VALLEY -  
REQUEST FOR RISK-BASED CORRECTIVE ACTION EVALUATION

Dear Messrs. Patel and Gupta:

This letter follows our meeting today during which was discussed the need to perform and tasks associated with a risk-based corrective action (RBCA) evaluation of the subject Castro valley site. We agreed on which exposure parameters would be modified from those presented in Table X2.6 of the ASTM E 1739-95 standard to better reflect site-specific conditions. Further, we agreed that one remaining task is to determine the locations of utility trenches or other corridors (e.g., sewer line trenches, etc.) and their potential to act as conduits for the transmission of gasoline vapors and impacted ground water toward sensitive receptors in order to better represent cumulative exposure risks.

This letter constitutes a formal request to perform a RBCA evaluation. I understand that your consultant will now begin to determine the locations of utilities and perform "subsite" risk assessments, based on specific receptor locations relative to expected exposure pathways and plume chemistry. We agreed to meet after the initial data had been manipulated to discuss the final rendering of this assessment.

Please call me at 510/567-6783 should you have any questions and when the initial assessment is ready to be discussed.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Mee Ling Tung, Director, Environmental Health  
Kevin Graves, RWQCB  
Dave Deaner, SWRCB  
Paul King, P&D Environmental

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO#209  
ARNOLD PERKINS, DIRECTOR  
RAFAT A. SHAHID, DEPUTY DIRECTOR

January 10, 1996

STID 1710

Alameda County CC4580  
Environmental Protection Division  
1131 Harbor Bay Parkway, Room 250  
Alameda CA 94502-6577

Mr. L.B. Patel  
VIP Service Station  
385 Century Circle  
Danville, CA 94526

RE: 3889 CASTRO VALLEY BOULEVARD, CASTRO VALLEY

Dear Mr. Patel:

I have completed review of the December 27, 1995 P&D Environmental (P&D) *Offsite Groundwater Quality Investigation Report* detailing the results of recent, as well as the prior, phase of the qualitative off-site investigation. I have additionally reviewed P&D's December 27, 1995 proposed scope of work for the continuation of this investigation.

The data presented in the December 27th report strongly suggest the fuel hydrocarbon plume has migrated from the subject site following bifurcated fronts: one front progressing to the west, consistent with average, calculated ground water flow; the other front progressing to the north, apparently exploiting more permeable sedimentary layers trending in that direction. Laboratory data indicate ground water sampled from points P9 and P3, which are representative of the diverging plume fronts, exhibits benzene concentrations of 2000 and 2600 parts per billion (ppb), respectively, at a distance of 110 and 160 feet from the former tank cluster, also respectively.

The body of data indicate the extent of the plume has yet to be adequately defined. Such is important when attempting to determine the most appropriate corrective action plan (CAP), particularly in a case where there is shallow ground water (<10 feet below grade), the plume has migrated below residential properties, and the expected CAP will need to take into account issues dealing with human health-based exposure criteria. Therefore, additional assessment is required to define the extent of the release from the subject site.

The scope of the cited December 27, 1995 P&D work plan for continuation of the current phase of this project is acceptable. Please contact me at 510/567-6783 when field work has been scheduled.

Mr. L.B. Patel  
RE: 3889 Castro Valley Blvd.  
January 10, 1996  
Page 2 of 2

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Jun Makishima, Acting Director  
Kevin Graves, RWQCB  
Don Atkinson-Adams, ACDEH  
Paul King, P&D Environmental

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0209

RAFAT A. SHAHID, Director

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Environmental Protection Division  
1131 Harbor Bay Parkway, #250  
Alameda, CA 94502-6577  
(510) 567-6700

August 1, 1995

STID 1710

Mr. Pawan Gupta  
Mr. Lalji Patel  
385 Century Circle  
Danville, CA 94526

RE: VIP SERVICE STATION, 3889 CASTRO VALLEY BOULEVARD, CASTRO  
VALLEY

Dear Messrs. Gupta and Patel:

I am in receipt and have completed review of the P&D Environmental (P&D) June 16, 1995 quarterly ground water monitoring and sampling report, and July 14, 1995 ground water off-site assessment report with attached P&D letter addendum of the same date. As you are aware, the June 16 report was submitted under your cover dated July 8, 1995.

P&D recommends at the close of the June 16 report a reduction in sampling frequency in wells MW-1 and -2 from quarterly to semi-annual. P&D further recommends the future omission of TPH-D analysis from the suite of target compounds sought in samples collected from well MW-3. These recommendations are reasonable and, therefore, accepted as proposed.

The results of the recent qualitative off-site ground water assessment, as memorialized in the cited July 14 report, indicate dissolved fuel hydrocarbons (HC) have migrated from the site in a direction generally trending towards the west. An apparent "hot" zone was also identified in sample point P1 located northwest of the former tank complex and adjacent to Castro Valley Boulevard.

As the extent of the dissolved HC plume has not yet been defined adequately enough to propose permanent well locations, additional plume definition is needed. The referenced July 14, 1995 P&D letter addenda proposes three (3) additional temporary sampling points west of the site, along Aspen Avenue. The proposed locations appear appropriate for continuation of the on-going soil and water investigation (SWI). Hence, this scope of work is acceptable as proposed and should begin as soon as access agreements can be obtained.



Messrs. Gupta and Patel  
RE: 3889 Castro Valley Blvd.  
August 1, 1995  
Page 2 of 2

As this qualitative phase of the SWI continues, I would encourage you to have your consultant expand the area of the investigation as needed to adequately define the plume. Should additional temporary well points appear necessary based on data collected during previous stages of the study, simply have your consultant notify this office of this fact in brief written form, and attach a map illustrating the locations of the additional sampling points to be installed. In this fashion work can continue in a timely manner without the unfortunate delay associated with formal work plan review. Once the plume has been reasonably defined using this qualitative approach, permanent well points may be proposed in a formal work plan.

Please call me at 510/567-6783 should you have any questions and when field work is slated to begin.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director  
Ed Laudani, Alameda County Fire Department  
Cheryl Gordon, SWRCB UST Fund  
Paul King, P&D Environmental

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0209

RAFAT A. SHAHID, Assistant Agency Director

STID 1710

April 7, 1995

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

Mr. Pawan Gupta  
Mr. Lalji Patel  
385 Century Circle  
Danville, CA 94580

RE: VIP SERVICE STATION, 3889 CASTRO VALLEY BOULEVARD, CASTRO VALLEY

Dear Messrs. Gupta and Patel:

This letter follows review of the February 28, 1995 P & D Environmental (P&D) preliminary off-site investigation work plan, as submitted under your cover dated March 4, 1995. This plan proposes the installation of five temporary ground water sampling points on the adjoining property to the west of the subject site. Permanent well placement will be proposed based upon the results of this preliminary stage.

The cited P&D work plan has been accepted with the following condition:

- o Should the temporary sampling points P2, P3, and P4 (Figure 2, P&D work plan) fail to reveal the presence of detectable concentrations of fuel hydrocarbons in sampled ground water, at least one additional temporary sampling point is to be emplaced midway between the subject site and the referenced sampling points.

Please call me at 510/567-6783 when field work is scheduled to begin, or should you have any questions.

Sincerely,

  
Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Env. Health  
Gil Jensen, Alameda County District Attorney's Office  
Ed Laudani, Alameda County Fire Department  
Paul King, P & D Environmental

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0209

RAFAT A. SHAHID, Assistant Agency Director

STID 1710

December 20, 1994

ALAMEDA COUNTY CC4580  
DEPT. OF ENVIRONMENTAL HEALTH  
ENVIRONMENTAL PROTECTION DIVISION  
1131 HARBOR BAY PKWY., #250  
ALAMEDA CA 94502-6577

Mr. Pawan Gupta  
Mr. Lalji Patel  
385 Century Circle  
Danville, CA 94526

RE: VIP SERVICE STATION, 3889 CASTRO VALLEY BOULEVARD, CASTRO VALLEY

Dear Messrs. Gupta and Patel:

This letter follows review of the case file for this site, up to and including the November 29, 1994 P & D Environmental quarterly monitoring report. Data collected during and since the April 1993 closure of three fuel and one waste oil underground storage tanks (UST) have clearly identified that an unauthorized release of fuel hydrocarbons has occurred at this site.

Ground water monitoring data generated since November 1993 have shown ground water gradient and flow direction to be towards the west. Ground water samples collected from monitoring well MW-3, located downgradient of the fuel and waste oil USTs and proximal to the western-most property boundary, have consistently shown elevated concentrations of fuel hydrocarbons. The extent of the contamination has not yet been defined.

Pursuant to provisions of Article 11, Title 23, California Code of Regulations, you are required to perform a soil and water investigation (SWI) to define the extent of both soil and ground water contamination. Such work will entail the installation of several more soil borings and monitoring wells. In order to substantially define the limits of the pollutant plumes, however, it is anticipated that during this phase of the investigation many, if not all, of these borings and wells will need to encroach upon adjoining properties.

A SWI work plan must be submitted for review. **This work plan is due within 90 days of the date of this letter.** Work should commence no later than 30 days following receipt of encroachment approval.

A report must be submitted within 45 days of the completion of field activities associated with this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for final RWQCB "sign off."

Messrs. Gupta and Patel  
RE: 3889 Castro Valley Blvd.  
December 20, 1994  
Page 2 of 3

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

- o Details and results of all work performed during the designated reporting period: 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 (including QA/QC data), tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of ground water contamination and characterization
- o Interpretation of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target compound, geologic cross sections, etc.
- o Recommendations for additional work

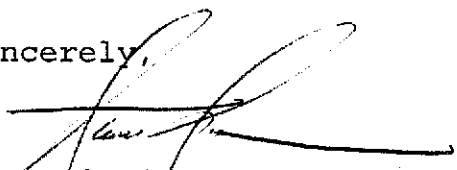
All reports and proposals must be submitted under seal of a California-registered geologist or civil engineer with the appropriate environmental background. Please include a statement of qualifications for each lead professional involved with this project.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Failure to respond may result in the referral of this case to the RWQCB for enforcement action.

Please also bear in mind that, in order to maintain SB2004 fund eligibility, specific bidding requirements and contracting criteria must be met. You are encouraged to contact your SWRCB fund representative (916/227-4529) for more case-specific information.

Please feel free to call me at 510/567-6783, should you have any questions.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

Messrs. Gupta and Patel  
RE: 3889 Castro Valley Blvd.  
December 20, 1994  
Page 3 of 3

cc: Rafat A. Shahid, Assistant Agency Director, Env. Health  
Gil Jensen, Alameda County District Attorney's Office  
Ed Laudani, Alameda County Fire Department  
Paul King, P & D Environmental

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0209

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

STID 1710

March 18, 1994

Mr. Pawan Gupta  
Mr. Lalji Patel  
385 Century Circle  
Danville, CA 94580

RE: VIP SERVICE STATION, 3889 CASTRO VALLEY BOULEVARD

Dear Messrs. Gupta and Patel:

This office is in receipt and has completed review of the January 24, 1994 P&D Environmental (P&D) soil excavation and monitoring well installation reports. These reports document overexcavation and resampling of the former underground storage tank (UST) pits, and monitoring well installation, monitoring, and sampling work occurring at the site between August and November 1993.

At this time, please adhere to the following sampling and reporting schedule:

- o Wells shall be sampled, and water elevations gauged, **quarterly**. All samples shall be analyzed for TPH-G and BTEX. Additionally, water samples collected from well MW-3, located down-gradient of the fuel and waste oil UST pits, shall also be analyzed for TPH-D, SVOCs (EPA 625), and HVOCs (EPA 601/624).
- o Technical reports shall be submitted **quarterly**.

Sampling and reporting frequencies shall be reevaluated following review of data generated over the next several quarters. A soil and water investigation (SWI), expanding the scope of the investigative work already completed, will be required at a future, not-too-distant date. The SWI will be designed to define the limits of soil and water pollution, the results of which work to be used in development of an appropriate corrective action plan (CAP). The SWI and CAP are requisite elements of Article 11 of Title 23, California Code of Regulations.

Messrs. Gupta and Patel  
RE: 3889 Castro Valley Blvd.  
Page 2 of 2  
March 18, 1994

Please feel free to call me at 510/271-4530 should you have any questions.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director  
Gil Jensen, Alameda County District Attorney's Office  
Ed Laudani, Alameda County Fire Department  
Paul King, P&D Environmental, 4020 Panama Ct.  
Oakland, CA 94611

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0209

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

STID 1710

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

September 24, 1993

Mr. Pawan Gupta  
Mr. Lalji Patel  
385 Century Circle  
Danville, CA 94526

RE: VIP SERVICE, 3889 CASTRO VALLEY BOULEVARD, CASTRO VALLEY

Dear Messrs. Gupta and Patel:

This office has completed review of the September 10, 1993 P & D Environmental Soil Excavation and Monitoring Well Installation Workplan describing proposed investigation and remediation activities at the referenced site. This work plan has been accepted with the following additions:

- 1) Soil sample selection criteria applied during boring advancement should also include collection at significant changes in lithology, and where instruments or other field screening methods identify zones of contamination;
- 2) Soil and ground water samples collected from MW-3 should be analyzed for TPH as gasoline, BTEX, oil and grease, halogenated volatile organic compounds (HVOC), and semi-volatile organic compounds (SVOC).

Please contact this office when field work is slated to begin. I may be contacted at 510/271-4530.

Sincerely,

  
Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director  
Gil Jensen, Alameda County District Attorney's Office  
Jim Ferdinand, Alameda County Fire Department  
Paul King, P & D Environmental



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0209

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

STID 1710

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 14, 1993

Mr. Pawan Gupta  
Mr. Lalji Patel  
VIP Service  
2060 Springwater Drive  
Fremont, CA 94539

RE: VIP SERVICE STATION, 3889 CASTRO VALLEY BOULEVARD, CASTRO VALLEY

Dear Messrs. Gupta and Patel:

The Department has completed review of the May 14, 1993 underground storage tank (UST) closure report issued by Accutite Environmental Engineering (Accutite), as submitted under VIP cover dated June 8, 1993. The referenced Accutite report documents the results of the April 26, 1993 closures of three (3) fuel and one (1) waste oil USTs and subsequent soil and ground water sampling.

Analyses of soil collected from the sidewalls of the fuel UST pit identified up to 6200 parts per million (ppm) concentration of total petroleum hydrocarbons as gasoline (TPH-G), and up to 92 ppm of benzene. Ground water collected from this UST pit exhibited 140 ppm TPH-G and 13 ppm benzene, among others. Apparent floating product was observed on the water's surface. Although two of the fuel USTs were observed to have moderate-to-severe pitting, no throughgoing holes were noted.

A soil sample collected from below the waste oil UST was impacted by 670 ppm TPH-G and 1300 ppm total oil and grease (TOG), among others. Certain halocarbons and polynuclear aromatic compounds (PNA) were also detected at low concentrations. The waste oil UST had several large throughgoing holes.

An unauthorized release clearly occurred at this site. An Underground Storage Tank Unauthorized Release (Leak) / Contamination Site Report was filed May 3, 1993 as a result of this release.

The San Francisco Bay Regional Water Quality Control Board (RWQCB) requires additional environmental investigations to be performed when unauthorized releases are discovered. Such investigations are in the form of a **Preliminary Site Assessment**, or PSA. The information gathered by a PSA is used to determine the extent of

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0209

RAFAT A. SHAHID, Assistant Agency Director

January 14, 1993

Mr. Paul Gupta  
Gupta Realty  
2060 Springwater Drive  
Fremont, CA 94539

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

**NOTICE OF LEGAL OBLIGATION**

**Re: Permit to Operate or Properly Remove Underground Storage Tanks (UST), VIP Service Station, 3889 Castro Valley Blvd, Castro Valley, CA 94546**

Dear Mr. Gupta:

According to our records, there are currently four abandoned underground storage tanks at your facility. It is my understanding that these tanks have been out of operation since October 1990. In accordance with the California Code of Regulations (CCR), Title 23, Division 3, Chapter 16 Underground Tank Regulations, you are required to perform one of the following actions:

1. If you are planning to operate your underground storage tank(s), apply for a permit to operate and pay necessary fees to this Department as required by Article 10, Section 2710, or
2. If you are not planning to operate your underground storage tank(s), submit a plan to remove the tank(s) from the ground and pay necessary fees as required by Article 7, Section 2670.

Please notify this Department within 30 days of your intentions.

If you have any questions, please do not hesitate to call me at (510)-271-4320.

Sincerely,

Amir K. Gholami, REHS  
Hazardous Materials Specialist

cc: files

PMV-PMT1

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0209

RAFAT A. SHAHID, Assistant Agency Director

October 16, 1992

Mr. Paul Gupta  
Gupta Realty  
2060 Springwater Drive  
Fremont, CA 94539

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

**NOTICE OF LEGAL OBLIGATION**

**Re: Permit to Operate or Properly Remove Underground Storage Tanks (UST), VIP Service Station, 3889 Castro Valley Blvd, Castro Valley, CA 94546**

Dear Mr. Gupta:

The inspection of your facility on October 16, 1992 revealed that there is one abandoned waste oil underground storage tank. In accordance with the California Code of Regulations (CCR), Title 23, Division 3, Chapter 16 Underground Tank Regulations, you are required to perform one of the following actions:

1. If you are planning to operate your underground storage tank(s), apply for a permit to operate and pay necessary fees to this Department as required by Article 10, Section 2710, or
2. If you are not planning to operate your underground storage tank(s), submit a plan to remove the tank(s) from the ground and pay necessary fees as required by Article 7, Section 2670.

Please notify this Department within 30 days of your intentions.

If you have any questions, please do not hesitate to call me at (510)-271-4320.

Sincerely,

*Rain*  
Amir K. Gholami, REHS  
Hazardous Materials Specialist

cc: files

PMV-PMT1

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0209

RAFAT A. SHAHID, Assistant Agency Director

October 1, 1992

Lalji B. Patel  
VIP Service Station  
3889 Castro Valley Blvd.  
Castro Valley, Ca 94546

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) [USTs] AT 3889 Castro Valley Blvd. Castro Valley**

This is in regard to a letter which was sent to you in the past. In that letter you were asked to submit to this office all pertinent information regarding your underground storage tank(s). This information is necessary for permitting of your tanks. To this date this office has not received any response from you. Please complete the following items and return them to me within 30 days:

1. Complete UST PERMIT FORM A-one per facility.
2. Complete UST PERMIT FORM B-one per tank.
3. Complete UST PERMIT FORM C-one per tank if information is available.
4. A written tank monitoring plan.
5. Results of precision tank test(s) (initial and annual).
6. Results of precision pipeline leak detector tests (initial and annual).
7. An accurate and complete plot plan.
8. A written spill response plan.
9. A copy of your inventory reconciliation statement for this year which indicates that all of your inventory reconciliation data are within "allowable variations" or which indicates a list of the periods of times and the corresponding variations when the allowable variation is exceeded. Allowable variation is 1% of the monthly deliveries plus 130 Gallons. Item 9 is necessary only if inventory reconciliation is used to monitor your tank(s).

Forms A, B, and C as well as examples of items 4, 7, and 8 indicated above were provided to you in the first letter.

Please be advised that Title 23 of the California Code of Regulation prohibits the operation of ANY UST without a permit. Please feel free to contact me at (510) 271-4320, if you have any questions regarding the mandatory five-year permit process.

Sincerely,

A handwritten signature in cursive script, appearing to read "Amir K. Gholami".

Amir K. Gholami, REHS  
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney  
Ed Howell-files

5YRNOV1

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

80007

May 1, 1992

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

Mr. Lalji Patel  
VIP Service Station  
3889 Castro Valley Blvd.  
Castro Valley, Ca 94546

Re: **FIVE-YEAR PERMITS FOR OPERATION OF FOUR  
UNDERGROUND STORAGE TANKS (UST'S) AT 3889  
CASTRO VALLEY BLVD CASTRO VALLEY**

According to our records the above mentioned facility has not received a five-year permit to operate UST's. Please complete the following items marked below and return them to me within 30 days. The example plans enclosed, should be used only as guidelines and may not meet your requirements under Title 23.

- 1. Complete UST PERMIT FORM A-one per facility. (enclosed)
- 2. Complete UST PERMIT FORM B-one per tank. (enclosed)
- 3. Complete UST PERMIT FORM C-one per tank if information is available. (enclosed)
- 4. A written tank monitoring plan. (enclosed)
- 5. Results of precision tank test(s) (initial and annual).
- 6. Results of precision pipeline leak detector tests (initial and annual).
- 7. An accurate and complete plot plan. (enclosed)
- 8. A written spill response plan. (enclosed)

Title 23 of the California Code of Regulation prohibits the operation of ANY UST without a permit. Please feel free to contact Amir K. Gholami at (510) 271-4320, if you have any questions which may arise in completing the mandatory five-year permit process.

Sincerely,

Ravi Arulanantham  
Senior Hazardous Materials Specialist  
(5YR)

cc: Gil Jensen, Alameda County District Attorney  
Rafat Shahid, Assistant Agency Director, Alameda  
County Department of Environmental Health

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0209

RAFAT A. SHAHID, Assistant Agency Director

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

April 19, 1992

Lal Patel  
VIP Service Station  
3889 Castro Valley Blvd  
Castro Valley CA 94546

NOTICE OF LEGAL OBLIGATION

Re: VIP Service Station, 3889 Castro Valley Blvd, Castro Valley  
94546

Dear Mr. Patel:

Our records indicate that there are four underground tanks at the above facility. In accordance with the California Code of Regulations (CCR), Title 23, Division 3, Chapter 16 Underground Tank Regulations, you are required to perform one of the following actions:

1. Submit a tank closure plan to this Department as required by Article 7, Section 2670, or
2. Apply for a permit as required by Article 10, Section 2710.

Please Notify this Department within 10 days of your intentions.

Please note that the California Health and Safety Code Section 25299(a) states that the operator or owner of an underground storage tank is liable for a civil penalty of not less than five hundred dollars or more than five thousand dollars per day per violation for failure to obtain a permit, or failing to properly close an underground storage tank, as required by section 25299.

To obtain the necessary instructions and or forms, contact Amir K. Gholami, Hazardous Material Specialist, at (510)-271-4320.

Sincerely,

Ravi Arulanantham  
Senior Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney

(NOV)

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0209

4/19/91

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

Certified Mailer # P 367 604 370  
(Previous mailer not received)

March 26, 1991

Messrs. P.P. Gupta and L.B. Patel  
VIP Service Station  
3889 Castro Valley Boulevard  
Castro Valley, CA 94546

RE: TEMPORARY CLOSURE

Dear Sirs:

This Department was informed March 22, 1991 that you intend to place your station into "temporary closure" status. The actions required to temporarily close your underground storage tanks (UST) are stipulated under Section 2671, Title 23, California Code of Regulations (CCR). To qualify for such interim measures, the storage of product must cease and the tanks be reinstated for use within 2 years. The tanks must be empty during temporary closure. Please be advised that temporary closure is not to be used in lieu of permanent closure where there is no intention to use the USTs in the future. Attached please find a copy of the January 22, 1991 correspondence from this office which clearly outlines your responsibilities to satisfy the temporary closure status.

This Department was also informed that the waste oil UST is also going to be taken "temporarily" out of service. You were reminded that this tank has yet to undergo requisite integrity testing. Such testing was to occur yearly for the life of the tank, the same requirement for the fuel USTs. Please be advised that this Department recognizes that this tank is currently out of compliance with the testing requirement, and that such testing will be required before it may be brought back into service.

Additionally, Section 2671(b)(2) of 23CCR requires that the tanks, once emptied of product or waste, be purged of flammable vapors to such levels that would preclude an explosion or such lower levels as may be required by the local agency. As was indicated to you March 22, this requirement is best addressed by the Castro Valley Fire Department. Hence, you are advised that Mr. Bob Bohman, the local Fire Marshal, should be contacted regarding this issue.

Messrs. Gupta and Patel  
RE: VIP Station, 3889 Castro Valley Blvd.  
March 26, 1991  
Page 2 of 2

Please call me at 415/271-4320 should you have any questions.

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health  
Edgar Howell, Chief, Hazardous Materials Division  
Gil Jensen, Alameda County District Attorney's Office  
Howard Hatayama, DHS  
Lester Feldman, RWQCB  
Bob Bohman, Castro Valley Fire Department  
files



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO209

Certified Mailer # P 062 127 987

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

March 26, 1991

Messrs. P.P. Gupta and L.B. Patel  
VIP Service Station  
3889 Castro Valley Boulevard  
Castro Valley, CA 94546

RE: TEMPORARY CLOSURE

Dear Sirs:

This Department was informed March 22, 1991 that you intend to place your station into "temporary closure" status. The actions required to temporarily close your underground storage tanks (UST) are stipulated under Section 2671, Title 23, California Code of Regulations (CCR). To qualify for such interim measures, the storage of product must cease and the tanks be reinstated for use within 2 years. The tanks must be empty during temporary closure. Please be advised that temporary closure is not to be used in lieu of permanent closure where there is no intention to use the USTs in the future. Attached please find a copy of the January 22, 1991 correspondence from this office which clearly outlines your responsibilities to satisfy the temporary closure status.

This Department was also informed that the waste oil UST is also going to be taken "temporarily" out of service. You were reminded that this tank has yet to undergo requisite integrity testing. Such testing was to occur yearly for the life of the tank, the same requirement for the fuel USTs. Please be advised that this Department recognizes that this tank is currently out of compliance with the testing requirement, and that such testing will be required before it may be brought back into service.

Additionally, Section 2671(b)(2) of 23CCR requires that the tanks, once emptied of product or waste, be purged of flammable vapors to such levels that would preclude an explosion or such lower levels as may be required by the local agency. As was indicated to you March 22, this requirement is best addressed by the Castro Valley Fire Department. Hence, you are advised that Mr. Bob Bohman, the local Fire Marshal, should be contacted regarding this issue.

Messrs. Gupta and Patel  
RE: VIP Station, 3889 Castro Valley Blvd.  
March 26, 1991  
Page 2 of 2

Please call me at 415/271-4320 should you have any questions.

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health  
Edgar Howell, Chief, Hazardous Materials Division  
Gil Jensen, Alameda County District Attorney's Office  
Howard Hatayama, DHS  
Lester Feldman, RWQCB  
Bob Bohman, Castro Valley Fire Department  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director

R0209

March 5, 1991

Mr. Richard Bowling  
1737 Vistagrand Drive  
San Leandro, CA 94577

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

RE: 3875 CASTRO VALLEY BOULEVARD

Dear Mr. Bowling:

This letter follows our telephone conversation of February 21, 1991. Our conversation was in regards to this Department's January 18, 1991 inspection of your rental property at the referenced Castro Valley address. The noted inspection was in response to our receipt of a complaint on January 14, 1991 regarding the presence of gasoline-like odors inside the dwelling. A similar inspection of an adjoining apartment at the same address occurred a year before on January 10, 1990 as a result of the resident of this apartment complaining of the odor of gasoline emanating from the apartment's shower floor drain.

During the earlier inspection on January 10, 1990, confirmation was made that the odor of gasoline appeared to be coming from the shower drain. A similar gasoline odor was detected near a plumbing vent attached to the outside rear wall of the kitchen at the residence of the current complainant. The inside of the building was then checked; the odor of gasoline was not detected from drains or elsewhere, although an odor reminiscent of turpentine or paint thinner was detected beneath the kitchen sink. At the time of the January 10, 1990 inspection, this dwelling was unoccupied, the most recent use, we understand, being that of a former antique store.

As a result of the observations made during the January 10, 1990 inspection, it was apparent that gasoline had somehow entered the sanitary sewer system serving the referenced property. The Castro Valley Sanitary District was contacted by this Department on January 17, 1990. This Department requested the District's assistance in determining whether such gasoline vapors were present in the sewer main serving the site.

The District dispatched an inspector who surveyed the noted main, identifying the presence of flammable vapors in this main at a concentration of 7%. Although not specifically stated by the District, the concentration is likely meant as 7% of the lower explosive limit (LEL). (The LEL is the minimum concentration of a flammable gas or vapor which, if provided with an adequate oxygen supply and an ignition source, could ignite. For example, the LEL of gasoline is a concentration in air of 1.4%. Hence, 7% of the LEL would equal a total gasoline concentration, if it was gasoline that was actually detected, of 0.098%.) This stretch of sewer main continues up Castro Valley Blvd. to the east where it appears to terminate near the westbound on-ramp to I-580. To the west and downgradient, this sewer appears to join another near Aspen Street.

Mr. Richard Bowling  
RE: 3875 Castro Valley Blvd.  
March 5, 1991  
Page 2 of 6

Because of its proximity to your property and the fact that the same sewer main serves both locations, the owners of VIP Service Station, 3889 Castro Valley Blvd., were contacted as a result of the noted fugitive gasoline vapors. The owners of this station, Messrs. P.P. Gupta and L.B. Patel, were informed, through correspondence from this office dated January 17, 1990, that the discovery of fugitive vapors in such places as buildings, utility vaults or sewers is defined by the Porter-Cologne Water Quality Control Act as constituting a "nuisance condition", and that such conditions require an investigation to determine their cause. In this letter the owners were requested to perform specific tasks, with which they complied through submittal of information under VIP cover dated January 29, 1991.

Following this Department's review of the submitted information, a meeting was held between this Department and the station owners on February 6, 1990. Several tasks were identified during this meeting which the station owners were requested to perform, summarized in correspondence from this office dated February 7, 1990. These tasks included:

- o Perform integrity tests on all four (4) underground storage tanks (UST) within 30 days
- o Determine the type of piping/dispensing system and ensure leak detectors were installed
- o Submit a completed Business Plan (HMMP)
- o Submit completed UST registration forms
- o Notification that tank reconciliation must be performed daily, tank tests are to be performed yearly, and reconciliation summaries are to be submitted every quarter

The tasks set forth in the February 7 correspondence from this Department were satisfied through the submittal of the requested information by the station owners, under VIP covers dated March 31 and April 20, 1990. Briefly, the UST integrity tests, performed by ACCUTITE Tank Testing of South San Francisco, were completed on the three gasoline tanks on February 7, 1990. The waste oil tank was not tested as its contents had (at that time) just recently been emptied. As we discussed, the test results did not indicate conclusively that the fuel tanks were or were not leaking. However, the test results do suggest that no gross leakage was occurring.

Mr. Richard Bowling  
RE: 3875 Castro Valley Blvd.  
March 5, 1991  
Page 3 of 6

The product piping was also tested (no leaks) and leak detectors were in place, although it does not appear that these detectors were tested at that time. The other elements (i.e., HMMP, UST registration, etc.) have essentially been satisfied. It does appear, however, that the waste oil UST has yet to be tested as evidenced by the lack of any test results in our files.

We understand that, since the original occurrence a year ago of gasoline odors in the shower drain in the apartment of the original complainant, you are not aware that the tenants have continued to have a problem with gasoline odors, nor has this Department been so notified. This fact, tempered with the VIP tank test data which did not substantiate a confirmed leak in any of their fuel USTs, strongly suggested that the presence of gasoline in the sewer system was a solitary occurrence, i.e., someone at a business or residence connected to the same sewer line also serving your property may have dumped gas down the drain. One would expect that a leak from a UST system would be a continual source of such nuisance conditions.

Since we last spoke, I found an entry filed under a generic "Castro Valley Fire Department" heading which described a similar occurrence of gasoline vapors in the sewer main near Castro Valley Blvd. and Aspen on August 22, 1984, just west of the subject property. A manhole just east of the current VIP station, operated at that time by Olympian Oil Company, was checked for vapors with none detected. The fire department requested that both the Olympian station and the former Texaco station, 3940 Castro Valley Blvd., perform UST integrity tests. The noted tests did not substantiate that the tanks at these two sites were leaking.

Following review of VIP inventory reconciliation reports covering the period of February through September 1990, this Department noted that inventory variations for the three fuel USTs at this site had exceeded allowable limits on a total of 39 times during the reporting period. The owners indicated in these reports that such discrepancies were as a result of several factors, including: the tanks are not level; product temperature variations; and, factors associated with tank testing.

In correspondence from this Department dated December 10, 1990, the owners were advised that tank reconciliation procedures and judgement of adequacy must strictly follow the requirements of Section 2641(c)(5)(B), Title 23, California Code of Regulations (CCR). Procedures for accounting for and factoring out what they had indicated were the causes of the discrepancies were described.

Mr. Richard Bowling  
RE: 3875 Castro Valley Blvd.  
March 5, 1991  
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The most recent UST reconciliation summary, for the period October through December 1990, indicates no variations over those allowable by Sec. 2641(c)(5)(B), 23CCR. A copy of the December 10 correspondence is enclosed for your review.

This Department became aware around the time of the January 18, 1991 inspection of your property that the VIP station was no longer selling fuel. The owners were advised in correspondence dated January 22, 1991 that certain protocol must continue to be followed to monitor the USTs or temporarily close the tanks. A copy of the January 22 letter is also enclosed.

The most recent inspection of your property, occurring January 18, 1991, followed this Department's receipt of a complaint concerning "gasoline-like" odors emanating from beneath the bathroom sink of the subject property. I arranged to meet your sister, Mrs. Aladeen Rosales, at the home of the complainant, Ms. Donna Huffman, on January 18. We understand that Ms. Huffman resides at the subject address with her daughter, and that she had complained of headaches and other discomfort as a result of these odors.

During my inspection there was an odor within the commode beneath the bathroom sink. The odor was similar to that detected a year before in this dwelling, i.e., more like turpentine or paint thinner rather than the crisp odor characteristic of gasoline. However, in my experience, old degraded gasoline will take on an odor not unlike that detected during my two inspections as the more volatile constituents are lost to evaporation over time due their elevated vapor pressures.

The ambient air within the home, as well as the atmosphere within the enclosed commode beneath the bathroom sink, was surveyed for the presence of organic compounds using two screening instruments. The atmospheres were first screened with an HNu Model PI-101 photo-ionization detector (PID) incorporating a 10.2 eV probe, calibrated using 100 parts per million (ppm) isobutylene in air. This instrument was set to read on a scale of 0-20 ppm. Second, following warm-up and self calibration, a Gastech Model GX-4000 flammable gas meter was used to screen for %LEL, O<sub>2</sub>, carbon monoxide (CO), hydrogen sulfide (H<sub>2</sub>S), and ppm. The Gastech is periodically calibrated using calibrant gases of 2.5% (25,000 ppm) methane in air, 26 ppm H<sub>2</sub>S in nitrogen, and 184 ppm CO in air. All measurements recorded with either instrument are, hence, relative to the calibrant gases (e.g., 2.5 ppm relative to isobutylene, 20% LEL relative to methane, etc.), as the survey instruments may be more or less sensitive to a target compound relative to the calibrant gases.

Mr. Richard Bowling  
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Ambient conditions within the living room registered 0.5 ppm (relative to isobutylene) on the HNu PID. This level rose to a highest reading of 2.2 ppm beneath the sink when the HNu's probe was inserted through the barely-opened door of the commode. This value rapidly dissipated as the commode door was left open for a few seconds. The probe was also inserted between the piping and the wall where the piping penetrated the wall at the rear of the commode. Here, the readings fluctuated between ambient and approximately 1.5-2.0 ppm. The HNu probe was also inserted through a ground-level vent at the northwest front corner of the home with no apparent deflection. The Gastech did not register any abnormal conditions, either beneath the sink or within the home as a whole.

The ambient readings within the home do seem higher than what might otherwise be expected. For comparison, the ambient level in the Department's office was measured and found to be 0.2 ppm; in my own home, 0.3 ppm; in my garage, 0.4 ppm. There may likely be no cause for alarm, however. Several common factors could raise the levels of ionizable organic compounds within a home, such as: gas pilot lights of stoves or heaters; the presence of ammonia from the biologic degradation of organic matter (e.g., cat litter box); off-gassing from carpets, paint, varnish, polishes, adhesives, etc. However, it is still apparent that an unknown organic vapor or gas is entering the dwelling through the gap where plumbing penetrates the wall beneath the bathroom sink, and perhaps through other cracks and crevices, as well.

I will not attempt to assess the risks associated with exposure to these unknown compounds. Too many assumptions would have to be made to even begin such an assessment at this early stage. The first step, obviously, would be to identify the contaminant(s). Once known, a qualified professional is required to assess the health risks for the individuals exposed to any compound. Such risks will vary between individuals dependent upon age, sex, genetic predisposition, and baseline health, among other factors.

You made the assumption that the source of the odor within the subject dwelling is likely the result of leaks from the VIP station's tanks. It is understandable to make such an assumption due to the station's proximity to your site. However, we have no compelling evidence to date that would substantiate that the tanks are currently leaking or have leaked in the past. This not to say that they have not leaked, but that there may be other yet-explored possible sources, e.g., an abandoned UST on your property. We will continue to closely monitor the results of UST tests and reconciliation data from the VIP station in the future, as we have done in the past, to identify the potential for leaks from their tanks.

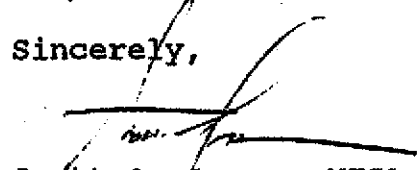
Mr. Richard Bowling  
RE: 3875 Castro Valley Blvd.  
March 5, 1991  
Page 6 of 6

To ensure the safety and well being of your tenant, we advise that you contract the services of an environmental consultant with expertise in identifying the exact contaminants within the subject home, evaluating the risks associated with exposure to the yet unknown contaminants, and determining their source. We further recommend that the consultant you employ have on staff a Certified Industrial Hygienist (CIH) to conduct the task of contaminant identification and the risks of exposure, or that you contract with an CIH separately. Further, a well engineered approach to identifying the potential source of the noted air contaminants, through conducting soil gas surveys or advancing borings and collecting soil/ground water samples, will likely satisfy any concerns you may have about contaminants impacting your property from leaks originating from the VIP station.

In the interim, we recommend that the home's bathroom window remain open to encourage ventilation, that adequate ventilation be provided for the remainder of the house, and that gaps where vapors could enter the home be sealed using an appropriate medium, such as caulk or other filler. Further, it would appear prudent to ensure an acceptable level of exterior (crawl space) cross-ventilation is provided beneath the house, as only one vent was noted at its northwest corner during the recent inspection. Such ventilation may substantially reduce the potential for fugitive vapors migrating into the house. Lastly, the sewer plumbing may be tested for signs of leaks possibly contributing to the conditions noted in this letter.

Should you have any questions, please contact this office at 415/271-4320.

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

enclosures

- cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
- Edgar Howell, Chief, Hazardous Materials Division
- Gordon Coleman, Supervisor, Environmental Health
- Howard Hatayama, DHS
- Bob Bohman, Castro Valley Fire Department
- Donna Huffman
- Messrs. Gupta and Patel, VIP Station files



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



00309

Certified Mailer # P 062 127 993

DEPARTMENT OF ENVIRONMENTAL HEALTH SERVICES  
Hazardous Waste Division  
602 West 12th Street, 5th Floor  
Oakland, CA 94612  
(415)

January 22, 1991

Messrs. P.P. Gupta and L.B. Patil  
VIP Gasoline Station  
3889 Castro Valley Boulevard  
Castro Valley, CA 94546

RE: TEMPORARY CLOSURE

Dear Sirs:

This Department has recently come to understand that your station has been closed. As we understand the facts associated with this closure, the closure may not have been due to any system malfunctioning, but rather the elevated cost of fuel. We further understand that this closure is likely a temporary measure.

Please be advised that certain protocol must continue to be followed to maintain compliance with the state underground tank laws and regulations. According to Section 2670(d), Title 23, California Code of Regulations (CCR), if product is still stored in the tanks at this site, although none is being dispensed, the tanks must still be monitored according to Section 2641(c)(5)(B) of 23CCR, your chosen monitoring alternative. This alternative requires that the tanks still be reconciled according to the schedule outlined in Section 2641(c)(5)(B), annual precision tests are performed, and gas/vapor leak detectors are also tested annually. Reconciliation reports must still be submitted to this Department quarterly.

According to Section 2671(a), the storage tanks must be permanently closed, however, if the storage of product has ceased but you wish to retain the ability to use the tanks within a period of time not to exceed 2 years. In such a case, the following actions must occur:

Section 2671(b)

- 1) All residual liquids, solids, or sludges shall be removed and disposed pursuant to the applicable provisions of Chp. 6.5 of Div. 20 of the Health and Safety Code;
- 2) The UST shall be purged of flammable vapors to levels that would prevent an explosion or such lower levels as may be required by the local agency (Castro Valley Fire Department);

Messrs. Gupta and Patel  
RE: 3889 Castro Valley Blvd.  
January 22, 1991  
Page 2 of 2

- 3) The UST may be filled with a noncorrosive liquid that is not a hazardous substance;
- 4) Except for required venting, all fill and access locations and piping shall be sealed utilizing locked caps or concrete plugs;
- 5) Power service shall be disconnected from all pumps associated with the use of these USTs.

(d) The USTs shall be inspected by the owner or operator at least once every three (3) months to assure temporary closure actions are still in effect. This shall include:

- 1) Visual inspections of all locked caps and concrete plugs;
- 2) If locked caps are utilized, check at least one (per tank) shall be required to note whether any liquid or vapors have been added to the USTs.

Please be advised that temporary closure applies only to those tanks proposed for reuse within two (2) years. Please notify this Department of your intended actions within 15 days, or by February 6, 1991.

Should you have any questions regarding the content of this letter, please call me at 415/271-4320.

Sincerely,

  
Scott O. Seery  
Hazardous Materials Specialist

cc: Rafat A. Bshahid, Assistant Agency Director, Environmental Health  
Edgar Howell, Chief, Hazardous Materials Division  
Gill Jensen, Alameda County District Attorney's Office  
Howard Hatayama, DHS  
Lester Feldman, RWQCB  
Bob Bohman, Castro Valley Fire Department

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0209

October 12, 1990

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

Mr. Larry A. Clark  
Grubb & Ellis Company  
475 14th Street, #1250  
Oakland, CA 94612

RE: VIP SERVICE STATION, 3889 CASTRO VALLEY BOULEVARD, CASTRO  
VALLEY, ALAMEDA COUNTY

Dear Mr. Clark:

As requested in your letter dated August 21, 1990, as amended, the Hazardous Materials Division has reviewed the referenced facility's files for information pertaining to underground storage tank (UST) leak tests and monitoring. The results of this review are summarized below:

- o On January 9, 1990, this Department received a complaint from the owner of a rental property (3875 Castro Valley Blvd.) adjacent to the subject station regarding the odor of gasoline emanating from the resident's shower drain. On January 10, 1990, this author investigated the report, and found that gasoline odors were apparent in the noted shower, and that they were also present in the bathroom, beneath the sink, and within a plumbing vent outside of an adjoining unit, a former antique store.
- o On January 17, 1990, the Castro Valley Sanitary District was contacted by this Department, and requested to check the sanitary sewers in proximity to the noted residence and subject station for flammable vapors. Their survey of the sewers identified flammable vapors as high as 7%.
- o A letter from this office, dated January 17, 1990, was addressed to Messrs. P.P. Gupta and L.B. Patel, owners of the subject station. The letter identified the potential for possible leaks from their (VIP's) tank systems, based on the "nuisance conditions" noted above. The January 17 letter also directed the owners to perform specific tasks to determine whether or not leaks existed. The tasks included: review of the station's inventory records for the prior 6 months; review the history of any tank or piping repairs; review records documenting previous fuel leak clean-ups; and, the results of any tank integrity tests performed in the past 5 years. A report was due within 15 days.

Mr. Larry A. Clark  
RE: VIP Gas Station, 3889 Castro Valley Blvd.  
October 12, 1990  
Page 2 of 3

- o A response to the January 17 letter from the station owners, dated January 29, 1990, was received by this Department on February 1. The report indicated: for the entire year of 1990, there was a net "gain" in all fuel tanks; no record of past leaks was available; no records documenting any clean-ups were available; and, the last integrity test had been performed in 1987, with no evidence of leaks.
- o Following this Department's review of the January 29 response, a meeting was called for February 6 to discuss the best course of action to resolve the investigation of the noted nuisance conditions. Several tasks were identified for the owners to perform. Of these, those tasks specifically pertaining to the UST system included: conducting a tank system integrity test within 30 days; ensuring that line leak detectors were installed, if piping is of pressurized (remote) type; the stipulation that reconciliation is to be performed daily; UST integrity and pipeline leak detector tests are to be performed yearly; and, reconciliation summaries are to be submitted quarterly.
- o The fuel UST systems were tested by ACCUTITE on February 27, 1990 and found to be "tight", this information supplied under VIP cover dated March 31, 1990.
- o Quarterly tank reconciliation summaries for quarters ending March 31 and June 30, 1990 state that, although there were some variations exceeding allowable limits encountered on several days during the reporting period, VIP is confident that these variations are due to such elements as: temperature variations; tank testing; fuel deliveries; and, tank level. They further indicate that no noteworthy variations are evident when viewed on a quarterly basis.
- o No further action has been required by this Department at this time involving additional investigation relative to the nuisance conditions.

This letter contains information limited to files located in this office, and does not reflect data that might be available from other agencies or parties, such as the Regional Water Quality Control Board. At this time, you will be billed for provision of the current services of this Department at the rate of \$60 per hour. Please find enclosed a copy of the invoice sent to our Billing Unit.

Mr. Larry A. Clark  
RE: VIP Gas Station, 3889 Castro Valley Blvd.  
October 12, 1990  
Page 3 of 3

Please contact me at 415/271-4320 should you have any questions.

Sincerely,



Scott O. Seery  
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health  
Edgar Howell, Chief, Hazardous Materials Division  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0209

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

February 7, 1990

Messrs. P.P. Gupta and L.B. Patel  
VIP Gasoline Station  
3889 Castro Valley Blvd.  
Castro Valley, CA 94546

RE: UNDERGROUND STORAGE TANK INVESTIGATION; VIP GASOLINE  
GAS STATION, 3889 CASTRO VALLEY BLVD., CASTRO VALLEY

Dear Messrs. Gupta and Patel:

Thank you for your participation in our meeting of February 6, 1990 and the cooperation and concern you have shown during the course of this investigation. As you may recall, this meeting was scheduled to clarify the sequence of events that are required during the investigation of nuisance conditions and to advise you of the state regulations applicable to the owners and operators of underground storage tank (UST) facilities storing hazardous materials.

The following points were covered during the February 6 meeting:

- 1) Perform an integrity test on all four (4) USTs within 30-days. Results of these tests must be reported within 2-weeks of the test date;
- 2) Determine whether product piping is pressure (turbine) or suction (remote) type. If the piping is pressure type, line-leak detectors must be installed;
- 3) Submit a completed Business Plan within 30 days;
- 4) Submit a completed Underground Storage Tank Registration Form (Form B) for the waste oil UST;
- 5) Be advised that UST integrity tests and pipeline leak detector tests must be performed and reported yearly;
- 6) UST reconciliation is to be performed daily; and,

Messers. Gupta and Patel  
RE: 3889 Castro Valley Blvd.  
February 7, 1990  
Page 2 of 2

- 7) Every quarter (3 mos.), a statement must be submitted which indicates whether or not reconciliation data is within allowable variations and, if not, the dates and variations that exceed the allowable values.

Again, thank you for your prompt attention to this matter. Should you have any questions, please call me at 415/271-4320.

Sincerely,



Scott O. Seery  
Hazardous Materials Specialist

SOS:tlh

cc: Rafat A. Shahid, Assistant Agency Director, Alameda County  
Department of Environmental Health  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Howard Hatayama, DHS  
Lester Feldman, RWQCB  
Bob Bohman, Castro Valley Fire Dept.  
Gail Stanton, Castro Valley Sanitation District  
Richard Bowling  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Director



R0209

Telephone Number: (415)

Certified #P 062 127 724

January 17, 1990

Messrs. P.P. Gupta and L.B. Patel  
VIP Gasoline Station  
3889 Castro Valley Blvd.  
Castro Valley, CA 94546

RE: NOTICE TO REVIEW UNDERGROUND STORAGE TANK RECORDS;  
VIP GAS STATION, 3889 CASTRO VALLEY BLVD., CASTRO VALLEY

Dear Messrs. Gupta and Patel:

Our office is in the process of investigating a report from the owner of an adjoining property regarding gasoline vapors permeating a residence and former business located at 3875 Castro Valley Blvd. The subject building was inspected by this department on January 10, 1990 and confirmed that gasoline vapors were emanating from a shower floor drain and a plumbing vent line at the rear of the building. Further, personnel from the Castro Valley Sanitation District surveyed the sanitary sewer system in proximity to your facility on January 17, 1990, detecting the presence of gasoline vapors within the system. The discovery of fugitive fuel vapors or free product in such places as buildings, utility vaults, storm drains or sewers constitutes a "nuisance condition", as defined by the Porter-Cologne Water Quality Control Act (Water Code).

The VIP Gas Station located at 3889 Castro Valley Blvd. is located topographically upgradient from, directly abuts, and is the only active facility known to have underground storage tanks (UST) within an approximate 1/4 mile radius of the subject site. Therefore, you are directed to perform specific tasks, as outlined below, in order to determine whether your facility has suffered a release of product from the UST's which has resulted in the nuisance conditions described previously. These requirements are imposed under authority granted by the Water Code - Title 23, Chapter 3, California Code of Regulations (CCR), on behalf of the San Francisco Bay Regional Water Quality Control Board (RWQCB).



Messers. P.P. Gupta and L.B. Patel  
VIP Gasoline Station  
3889 Castro Valley Blvd.  
Castro Valley, CA 94546  
January 17, 1990  
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You are hereby directed to review:

1. Inventory records for the previous six (6) months for each tank;
2. The complete history of any tank and/or piping repairs;
3. Records documenting previous fuel leak cleanups; and,
4. Results of tank integrity tests performed within the last 5 years.

The results of this record review are to be summarized and submitted to this office within 15 days of the date of this letter. Include with your submittal copies of the State of California Underground Storage Tank Program registration forms, and all tank integrity test reports referenced above.

Following review of these documents, we will advise you of any further steps or procedures which you will be required to perform. Should you have any questions, please call the undersigned at 415/271-4320.

Sincerely,



Scott O. Seery  
Hazardous Materials Specialist

SOS:tln

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Agency  
Howard Hatayama, DHS  
Lester Feldman, RWQCB  
Bob Bohman, Castro Valley Fire Dept.  
Gail Stanton, Castro Valley Sanitation District  
Richard Bowling  
Files