

DAVID J. KEARS, Agency Director



07-08-02

RO255

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION

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

STID 779

July 2, 2002

Mr. Paul Supple ARCO Products Company PO Box 5077 Buena Park, CA 90622-5077

RE: ARCO Service Station # 0608 located at 17601 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Supple:

This office is in receipt of "Quarterly Groundwater Monitoring Report, First Quarter 2002" dated May 14, 2002, submitted by Mr. Shaw Garakani of Shaw Environmental and Infrastructure, Inc., regarding the above referenced site. I have reviewed this document and would like to make the following comments:

- This report reflects increase of concentration in MTBE in monitoring wells onsite as well
 as offsite. MW-5 and EA-1 onsite well as well as MW-8 offsite monitoring well have
 revealed increased concentrations of MTBE. Due to increased concentration of MTBE
 in the past, the GWET system has been reactivated since June 5, 2002. Therefore, it is
 imperative that GWET system be properly maintained and operated in order to address
 such increase in concentration of the constituents.
- MTBE concentration is the highest at 1,100 ppb in MW-5 and MW-8 wells, followed by MW-10 at 570ppb, and E-1A extraction well at 310ppb. This reflects an increase since previous analysis in all the above wells.
- To this date 1.06, 0.04, and 0.27 gallons of TPPH-g, Benzene, and MTBE has been recovered by GWET system. However, the MTBE recovery was not calculated prior to 6/15, 2000.
- Groundwater flow gradient is westerly at 0.003 ft/ft, Per figure 2 within this report.
- Proposals, made by Mr. Garakani regarding the agenda for the next quarter, are acceptable to this office.
- I understand that Mr. Scott E. Robinson of URS Corporation will be managing this
 project from now on.

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

Sincerely,

Amir K. Gholami, REHS

Langealli

Hazardous Materials Specialist

C: Mr. Shaw Garekani, The It Group Inc., 1921 Ringwood Ave., San Jose, CA 95131-1721

Mr. Peter Langtry, Lowney Associates, 129 Filbert, Oakland, CA

Mr. Scott E. Robinson, URS Corporation, 500 12th Street, Suite 200, Oakland,

CA 94607

Files



DAVID J. KEARS, Agency Director



10-01-01

RO255

ENVIRONMENTAL HEALTH SERVICES

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

STID 779

September 27, 2001

Mr. Paul Supple ARCO Products Company PO Box 5077 Buena Park, CA 90622-5077

RE: ARCO Service Station # 0608 located at 17601 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Supple:

I am in receipt of Quarterly Groundwater Monitoring Reports dated June 6, 2001, Groundwater Analytical Results, First Quarter 2001, and all attachments regarding Reimbursements for miscellaneous sites related to the above referenced site. All the above reports were submitted by Mr. Shaw Garakani of The It Group.

These reports reflect the efficiency of GWET system in, the concentration of chemicals in monitoring wells and domestic irrigation wells affected by the plume. I would like to make the following comments regarding the above reports:

- I understand that the GWET was reactivated due to increase in concentrations of MTBE.
- The highest concentration of MTBE within domestic irrigation well was noted at 17349 Via Magdalena, San Lorenzo at 98.3ppb.
- Per figure 2, within this report, the groundwater flow gradient is to the west at 0.003 ft/ft similar to the previous indication.
- Per this report MTBE concentration is the highest in MW-8 reduce to 188ppb compared to 243ppb previously.
- MTBE was found to be at 140 within MW-25 well.
- Benzene concentrations were all low or non-detect, with highest at EA-1 Extraction well at 1.78ppb.

Per my previous correspondence, you may reduce analysis of the well(s), which have historically shown ND or very low concentrations of chemical constituents.

I concur with Mr. Garakani regarding the work proposed for the next quarter in the same document.

Should you have any questions, please do not hesitate to call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Mr. Shaw Garekani, The It Group Inc., 1921 Ringwood Ave., San Jose, CA 95131-1721 Mr. Peter Langtry, Lowney Associates, 129 Filbert, Oakland, CA Files



DAVID J. KEARS, Agency Director

June 7, 2001

P0259

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

Michael S. Van Allen Project Coordinator TAIT & ASSOCIATES, Inc. 1001 Galaxy Way Suite 304 Concord, California 94520

RE: ARCO Facility #0608, 17601 Hesperian Boulevard, San Lorenzo, CA

Dear Mr. Van Allen:

The original scope of work for the subject site has been changed from three underground storage tanks (USTs) to four USTs. On June 6, 2001 an additional set of plans were submitted to this office to include upgrades and modifications to the used oil tank.

The plan check fees paid by TAIT for the project, \$748.00, was based on three USTs. Additional fees are due at this time. The cost of the project for four USTs totals \$938.00.

Please remit a check payable to *Treasurer*, *Alameda County*, for the sum of \$190.00. The additional funds will bring the account into compliance. Please reference SR0000758, on your check.

If you have any questions regarding this matter please contact me directly at (510) 567-6781.

Robert Weston

Sr. Hazardous Materials Specialist

Cc: Susan Hugo, ACDEH



05-04-01

R0255

May 4, 2001

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9385

Ms. Amy Castro, Project Coordinator Tait & Associates, Inc. 2880 Sunrise Boulevard, Suite 206 Rancho Cordova, CA 95742

DAVID J. KEARS, Agency Director

AGENCY

RE: Arco Site #608, 17601 Hesperian Blvd. @Hacienda, San Lorenzo, CA

Dear Ms. Castro:

I will be the caseworker that will be reviewing the modification plans associated with the underground tanks at the above site while Rob Weston is on vacation. Rob will return back to this office on May 29, 2001.

In your letter dated February 22, 2001, it identifies in addition to the installation of dispenser containment pans, the removal and installation of new dispensers and piping will also be included in the scope of work. Please review the enclosed document titled "Underground Storage Tank Removal Process" and complete the Underground Tank Closure Plan and submit it to Rob or myself for approval.

This office reviews only completed workplans for approval. Once we receive the name of your contractor, we will review your workplans.

If you have any questions, please contact me at (510) 567-6774.

Larry Sett

r Hazardous Materials Specialist

Enc.(1) Underground Storage Tank Removal Process

(1) Underground Tank Closure Plan

Cc: Rob Weston, Alameda County Environmental Health Files

AGENCY

DAVID J. KEARS, Agency Director



0374-01

PO255

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION

Alameda, CA 94502-6577

(510) 567-6700

FAX (510) 337-9335

1131 Harbor Bay Parkway, Suite 250

Stid 779

March 13, 2001

Mr. Paul Supple ARCO Products Company PO Box 5077

Buena Park, CA 90622-5077

RE: ARCO Service Station # 0608 located at 17601 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Supple:

This office is in receipt of Quarterly Groundwater Monitoring Reports dated March 7, 2001 submitted by Mr. Shaw Garakani of The It Group. Among other information, this report reflects the concentration of chemicals in monitoring wells as well as domestic irrigation wells.

Per this report MTBE concentration is the highest in MW-8 at 243ppb followed by irrigation domestic well 17349 at 197, MW-10 at 145ppb, and MW-25 at 134ppb. Since the MTBE concentration has increased in some of the wells, the GWET system has been reactivated.

Groundwater flow gradient is to the west at 0.003 ft/ft according to figure 2 of the same report.

You may propose to reduce analysis of the well(s), which have historically shown ND or very low concentrations of chemical constituents.

I do concur with the work proposed for the next quarter as indicated by Mr. Garakani in the same document.

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

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Mr. Shaw Garekani, The It Group Inc., 1921 Ringwood Ave., San Jose, CA 95131-1721 Mr. Peter Langtry, Lowney Associates, 129 Filbert, Oakland, CA Files

AGENCY





PO255

Stid 779

December 5, 2000

Mr. Michael Whelan ARCO Products Company PO Box 5077 Buena Park, CA 90622-5077 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

RE: ARCO Service Station # 0608 located at 17601 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Whelan:

I am in receipt of Quarterly Groundwater Monitoring Reports dated October 20, 2000 and November 9, 2000 submitted by Mr. Shaw Garakani of The It Group. Both reports reveal the concentration of chemicals in monitoring wells as well as domestic irrigation wells.

According to these reports MTBE concentration is the highest in MW-10 at 413ppb followed by MW-25 at 192ppb and MW-8 at 160ppb. MTBE concentration has therefore been fluctuating and slightly risen in MW-10 since the previous analysis.

I concur with the work proposed for the next quarter as indicated by Mr. Garakani in the same document.

Should you have any questions, please do not hesitate to call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Mr. Shaw Garekani, The It Group Inc., 1921 Ringwood Ave., San Jose, CA 95131-1721 Mr. Peter Langtry, Lowney Associates, 129 Filbert, Oakland, CA

Files

AGENCY



DAVID J. KEARS, Agency Director

R0255

Stid 779

August 2, 1999

Mr. Kyle Christie ARCO Products Company PO Box 5077 Buena Park, CA 90622-5077 **ENVIRONMENTAL HEALTH SERVICES**

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

RE: ARCO Service Station # 0608 located at 17601 Hesperian Blvd., San Lorenzo, CA

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Christie:

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

For purposes of implementing these sections, you have been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change.

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

LANDOWNER NOTIFICATION

Re: 17601 Hesperian Blvd., San Lorenzo

August 2, 1999 Page 2 of 2

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

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

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

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

Sincerely,

Amir K. Gholami, REHS

Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB

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

Alameda County.

AGENCY



DAVID J. KEARS, Agency Director

Ro#255

Stid 779

March 8, 1999

Mr. Kyle Christie ARCO Products Company PO Box 5077 Buena Park, CA 90622-5077 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700

FAX (510) 337-9335

RE: ARCO Service Station # 0608 located at 17601 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Christie:

This office has not received the Quarterly Groundwater Monitoring Report since the last report dated September 30th, 1998 submitted by Pacific Environmental Group, Inc. I believe the next report was to be submitted in January 1999. Please comply with the following:

- 1. Submit the next Quarterly Groundwater Monitoring Report by April 9th, 1999.
- 2. Submit a copy of the Tier II risk assessment performed regarding MTBE in 1998.

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

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Mr. Shaw Garekani, Pacific Environmental Group, Inc., 2025 Gateway Place, Suite 440 San Jose, CA 95110-1006 files

AGENCY



DAVID J. KEARS, Agency Director

Ro# 255

Stid 779

February 24, 1999

Mr. Kyle Christie **ARCO Products Company** PO Box 5077 Buena Park, CA 90622-5077

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

RE: ARCO Service Station # 0608 located at 17601 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Christie:

I will be overseeing the above case. I have received and reviewed the Quarterly Groundwater Monitoring Report dated September 30th, 1998 submitted by Pacific Environmental Group, Inc. This report indicates that the concentration of chemicals in all monitoring wells have diminished except MW-5, MW-8, MW-9, MW-10, and MW-12 (E-1A). MW-12 has the highest concentration of the constituents containing up to 11000ppb of TPH(G), 1300ppb of benzene, 550ppb of ethylbenzene, 380ppb of Xylene, and 220ppb of MTBE. The irrigation wells contain low concentrations of the constituents as well. However, the irrigation wells 633H, 17349 VM, 17372 VM have to be closely observed due to existence of some of the constituents recently. I do concur with the work proposed for the next quarter as indicated in the same document.

Furthermore, I talked to Mr. Shaw Garekani of Pacific Environmental Group Inc., regarding the above case. He informed me that a Tier II risk assessment for BTEX had been performed and approved by our office in 1993. He also indicated that a Tier II risk assessment was later performed for MTBE in 1998 and was verbally approved by Madhulla Logan of our office for the above site. In addition, Mr. Garekani requested the above case be considered for closure. I requested him to send me a copy of the MTBE risk assessment and information regarding the "closure summary". Upon receipt of the above documents, i will discuss the case with Madhulla Logan of our office and will look into the possibility of closure regarding the above site.

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

Sincerely.

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Mr. Shaw Garekani, Pacific Environmental Group, Inc., 2025 Gateway Place, Suite 440 San Jose, CA 95110-1006 files





RO# 255

Stid 779

February 22, 1999

Mr. Shaw Garekani Pacific Environmental Group Inc. 2025 Gateway Place, Suite 440 San Jose, CA 95110 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

RE: ARCO Service Station # 0608 located at 17601 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Garekani:

As we discussed, I have been assigned to oversee the above case. In our discussion you indicated that there was a Tier II risk assessment performed on BTEX which was approved by our agency in 1993. Furthermore, you indicated that risk assessment on Benzene was also performed on the above site in 1998. This assessment, you indicated, was verbally approved by Madhulla Logan of our office in 1998. I would like to address the following issues:

- Please send a copy of the letter of the approval for the risk assessment performed in 1993 on BTEX to this office.
- There was an error in my letter regarding Peter Lantry, the consultant for the landlord, who
 actually works for Lowney Associates and not for Pacific Environmental Group Inc
 representing ARCO.
- As you are well aware and per our discussion, the closure summary document is necessary
 if and when this office considers the site for closure.
- Upon receiving the above documents, I will discuss the case with Madhulla Logan of our
 office regarding Tier II risk assessment and your request for site closure.

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

Sincerely,

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



DAVID J. KEARS, Agency Director

RO# 255

Stid 779

February 9, 1999

Mr. Michael Whelan ARCO Products Company 2000 Alameda de las Pulgas PO Box 5811 San Mateo, CA 94402 **ENVIRONMENTAL HEALTH SERVICES**

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

RE: ARCO Service Station # 0608 located at 17601 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Whelan:

I have been assigned to oversee the above case. I have received and reviewed the Quarterly Groundwater Monitoring Report dated September 30th, 1998 submitted by Pacific Environmental Group, Inc. This report indicates that the concentration of chemicals in all monitoring wells have diminished except MW-5, MW-8, MW-9, MW-10, and MW-12 (E-1A). MW-12 has the highest concentration of the constituents containing up to 11000ppb of TPH(G), 1300ppb of benzene, 550ppb of ethylbenzene, 380ppb of Xylene, and 220ppb of MTBE. The irrigation wells contain low concentrations of the constituents as well. However, the irrigation wells 633H, 17349 VM, 17372 VM have to be closely observed due to existence of some of the constituents recently. I do concur with the work proposed for the next quarter as indicated in the same document.

Additionally, I talked to Mr. Peter Langtry of Pacific Environmental Group Inc., regarding the above case. He informed me that a Tier II risk assessment has been performed for the above site. I asked Mr. Langtry to forward me a copy of this document along with the latest quarterly monitoring report. Madhulla Logan of our office will evaluate tier II risk assessment, once received.

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

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Peter Langtry, Pacific Environmental Group, Inc., 2025 Gateway Place, Suite 440 San Jose, CA 95110-1006 files

AGENCY



DAVID J. KEARS, Agency Director

R0 #255

Stid 779

February 9, 1999

Mr. Michael Whelan ARCO Products Company 2000 Alameda de las Puigas PO Box 5811 San Mateo, CA 94402 ENVIRONMENTAL HEALTH SERVICES

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

RE: ARCO Service Station # 0608 located at 17601 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Whelan:

I have been assigned to oversee the above case. I have received and reviewed the Quarterly Groundwater Monitoring Report dated September 30th, 1998 submitted by Pacific Environmental Group, Inc. This report indicates that the concentration of chemicals in all monitoring wells have diminished except MW-5, MW-8, MW-9, MW-10, and MW-12 (E-1A). MW-12 has the highest concentration of the constituents containing up to 11000ppb of TPH(G), 1300ppb of benzene, 550ppb of ethylbenzene, 380ppb of Xylene, and 220ppb of MTBE. The irrigation wells contain low concentrations of the constituents as well. However, the irrigation wells 633H, 17349 VM, 17372 VM have to be closely observed due to existence of some of the constituents recently. I do concur with the work proposed for the next quarter as indicated in the same document.

Additionally, I talked to Mr. Peter Langtry of Pacific Environmental Group Inc., regarding the above case. He informed me that a Tier II risk assessment has been performed for the above site. I asked Mr. Langtry to forward me a copy of this document along with the latest quarterly monitoring report. Madhulla Logan of our office will evaluate tier II risk assessment, once received.

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

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Peter Langtry, Pacific Environmental Group, Inc., 2025 Gateway Place, Suite 440 San Jose, CA 95110-1006 files

AGENCY

R0255

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH State Water Resources Control Board Division of Clean Water Programs UST Local Oversight Program 1131 Harbor Bay Parkway

> Alameda, CA 94502-6577 (510) 567-6700

DAVID J. KEARS, Agency Director

July 21, 1995

Michael Whelan ARCO Petroleum Products Co. 2155 S Bascom Avenue, Suite 202 Campbell CA 95008

StId 779

Subject: Work Plan and RI/FS revisions for ARCO Service Station

0608 located at 17601 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Whelan:

This office has reviewed the Work Plan and RI/FS Supplemental Information, dated June 28, 1995, submitted by Pacific Environmental Group, Inc. (Pacific).

The work plan proposes to conduct a pilot study to determine the feasibility of reducing petroleum hydrocarbon contamination in groundwater by enhancing in-situ aerobic biodegradation via installation of oxygen releasing compounds (ORC) in wells located upgradient from monitoring wells MW-8 and MW-10. Additionally, the work plan proposes to discontinue pumping of the on-site groundwater extraction well EA-1 throughout the pilot study (July 1995 through December 1995) to allow for evaluation of its affect on migration of the dissolved petroleum hydrocarbon plume and to allow dissolved oxygen to disperse downgradient in groundwater in the area of MW-8. Per the work plan, dissolved oxygen concentrations will be measured monthly in wells EA-1, SP-1, SP-2, MW-8, and MW-10. A progress report of the pilot study will be included in the third quarter 1995 report, and the analyses for groundwater parameters indicative of biodegradation, which were completed for the baseline groundwater biodegradation study in May 1995, will be repeated and reported in the forth quarter 1995 report.

The RI/FS Supplemental Information contained revisions to the November 1994 draft that included 1) a feasibility study to gather baseline concentrations of groundwater parameters to identify those parameters which may be rate limiting to natural biodegradation, 2) a risk assessment of residential indoor inhalation exposure to benzene, and 3) the inclusion of ORCs, to enhance in-situ bioremediation, to Alternative 2 of the Remedial Action Alternatives.

The Work Plan and RI/FS revisions are acceptable to this office with the following additions and/or comments:

Whelan

Re: 17601 Hesperian Blvd

July 20, 1995 Page 2 of 3

- 1. Based on the results of the baseline concentrations of dissolved oxygen collected from monitoring and domestic irrigation wells in May 1995, dissolved oxygen was limited throughout the entire study area, i.e. there were no "background" levels established for dissolved oxygen. This is contrary to what was stated in the RI/FS. By implementing Remedial Action Alternative 2, it is anticipated that increased dissolved oxygen levels by the use of ORC will increase the rate of in-situ biodegradation. However, if it is found from the pilot study that petroleum hydrocarbon concentrations do not significantly decline in areas of concern (i.e. the biodegradation rate for petroleum hydrocarbons does not increase), then other, more effective remedial alternatives, and possibly containment measures, should be considered and implemented.
- 2. In addition to conducting monthly measurements for dissolved oxygen concentrations during the pilot study, groundwater samples should be collected from monitoring wells EA-1, MW-8, and MW-10 and analyzed for TPH-g and BTEX on a monthly basis. Restarting or pulsing the groundwater extraction system may need to be considered if an increasing trend of petroleum hydrocarbon concentrations is detected.
- 3. Remedial Action Alternative 2 should not include that well owners be given the go ahead to begin pumping. Per the May 9, 1995 meeting, the Groundwater Management Plan will address the timing, appropriateness, and monitoring involved with health protection and plume migration in regard to allowing for pumping of the domestic irrigation wells. It seems appropriate that well owners should be asked not to pump at least through the pilot study while the on-site extraction system is turned off. During this time, careful monitoring should be performed to insure that petroleum hydrocarbon concentrations do not increase downgradiant of the site.
- 4. We concur with the methodologies and exposure pathways evaluated in the risk assessment. (This evaluation did not include municipal/daily drinking water standards.) Based on current information at the site, it is the opinion of this agency that there is no significant public health risk in the areas and concentrations evaluated.
- 5. Please submit a draft copy of the "Fact Sheet" to this office for review and approval, prior to submitting it to the public. In addition, it was discussed in the May 9, 1995 meeting that a mass mailing of the "Fact Sheet" would be distributed to all properties in the affected area,

Whelan

Re: 17601 Hesperian Blvd

July 20, 1995 Page 3 of 3

including properties with <u>and</u> without wells. Per my recollection, you were planning to use an address list that was compiled during the initial domestic well survey. Please submit a copy of this list to our office.

Please contact me at (510)567-6755 to discuss any of the above concerns. We hope the pilot study goes well and look forward to receiving preliminary information in the third quarter monitoring report.

Sincerely,

Amy Leech

Hazardous Materials Specialist

W Beech

c: Ms. Debra Moser Mr. Keith Winemiller Pacific Environmental Group, Inc. 2025 Gateway Place, Suite 440 San Jose, CA 95110

> Ravi Arulanantham California Regional Water Quality Control Board San Francisco Bay Region 2101 Webster St., Suite 500 Oakland, CA 94612

> Kevin Graves California Regional Water Quality Control Board San Francisco Bay Region 2101 Webster St., Suite 500 Oakland, CA 94612

Acting Chief of Environmental Protection - Files(ALL)

DAVID J. KEARS, Agency Director



R0255

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, CA 94502-6577

eda, CA 94502-6577 (510) 567-6700

StId 779

April 21, 1995

Ravi Arulanantham California Regional Water Quality Control Board San Francisco Bay Region 2101 Webster Street, Suite 500 Oakland, CA 94612

Subject: In-house meeting before the meeting to discuss and resolve issues of concern regarding remedial action plans and risk assessment for ARCO Service Station 0608

located at 17601 Hesperian Blvd., San Lorenzo, CA 94580

Please see attached a letter that confirms the May 9, 1995 meeting time with the R.P. and their consultant for the subject site. It appears that an in-house meeting to discuss the data, risk assessment, and proposed remedial action plan for this site is necessary in order for us to reach a consensus on how best to proceed. Ideally and because Pacific Environmental Group on behalf of ARCO has requested this, we hope to give ARCO and Pacific Environmental Group a concise idea of what Alameda County and RWQCB expect ARCO's future plan of action should be in regard to this site.

We are planning to meet at 9:30 A.M. on May 9, 1995 at our office. I very much appreciate your time and assistance with this site.

Sincerely,

Amy Leech

Hazardous Materials Specialist

<u>Distribution List</u>

Ravi Arulanantham, RWQCB

my Keech

Kevin Graves, RWQCB

Juliet Shin, Alameda County Dept. of Env. Health

attachment

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, DIRECTOR

R0255

StId 779

April 21, 1995

DEPARTMENT OF ENVIRONMENTAL HEALTH State Water Resources Control Board Division of Clean Water Programs **UST Local Oversight Program** 1131 Harbor Bay Parkway Alameda, CA 94502-6577 (510) 567-6700

Kevin Graves California Regional Water Quality Control Board San Francisco Bay Region 2101 Webster Street, Suite 500 Oakland, CA 94612

In-house meeting before the meeting to discuss and Subject: resolve issues of concern regarding remedial action

plans and risk assessment for ARCO Service Station 0608 located at 17601 Hesperian Blvd., San Lorenzo, CA 94580

Please see attached a letter that confirms the May 9, 1995 meeting time with the R.P. and their consultant for the subject site. It appears that an in-house meeting to discuss the data, risk assessment, and proposed remedial action plan for this site is necessary in order for us to reach a consensus on how best to proceed. Ideally and because Pacific Environmental Group on behalf of ARCO has requested this, we hope to give ARCO and Pacific Environmental Group a concise idea of what Alameda County and RWQCB expect ARCO's future plan of action should be in regard to this site.

We are planning to meet at 9:30 A.M. on May 9, 1995 at our office. I very much appreciate your time and assistance with this site.

Sincerely,

Amy Leéch

Hazardous Materials Specialist

Distribution List

Ravi Arulanantham, RWQCB

my Leech

Kevin Graves, RWQCB

Juliet Shin, Alameda County Dept. of Env. Health

attachment

RAFAT A. SHAHID, DIRECTOR

StId 779

April 20, 1995

DAVID J. KEARS, Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

Michael Whelan ARCO Petroleum Products Co. 2155 S Bascom Ave Campbell CA 95008

Subject: Meeting to discuss and resolve issues of concern

regarding remedial action plans and risk assessment for ARCO Service Station 0608 located at 17601 Hesperian

Blvd., San Lorenzo, CA 94580

The meeting to discuss the subject site will be held on Tuesday, May 9, 1995 at 1:00 P.M.. The meeting location is Room 201 at:

Alameda County Department of Environmental Health Environmental Protection Division 1131 Harbor Bay Parkway, 2nd Floor Alameda, CA 94502

DIRECTIONS

From Highway 880

Take Hegenberger Exit and go west toward Oakland Airport
Turn Right onto Highway 61 (Doolittle Rd.)
Turn Left onto Harbor Bay Parkway
Continue past the golf course
Turn right onto "C" Street

Follow signs marked "Alameda County Environmental Health Dept." Park in front of the building and enter through the front door

Please call me at (510)567-6755 if you need additional information.

Sincerely,

Amy Leech

Hazardous Materials Specialist

Distribution List

Ravi Arulanantham, RWQCB

Kevin Graves, RWQCB

Debra Moser, Pacific Environmental Group, Inc.
Juliet Shin, Alameda County Dept. of Env. Health
Keith Winemiller, Pacific Environmental Group, Inc.

Michael Whelan, ARCO Petrolem Products Co.

DAVID J. KEARS, Agency Director

R0255

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH State Water Resources Control Board Division of Clean Water Programs UST Local Oversight Program 1131 Harbor Bay Parkway Alameda, CA 94502-6577 (510) 567-6700

April 20, 1995

Debra Moser Keith Winemiller Pacific Environmental Group, Inc. 2025 Gateway Place, Suite 440 San Jose, CA 95110

Meeting to discuss and resolve issues of concern Subject:

regarding remedial action plans and risk assessment for ARCO Service Station 0608 located at 17601 Hesperian

Blvd., San Lorenzo, CA 94580

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Sincerely,

Hazardous Materials Specialist

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Michael Whelan, ARCO Petrolem Products Co.

R0255

RAFAT A. SHAHID, DIRECTOR

StId 779

April 20, 1995

DAVID J. KEARS, Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH State Water Resources Control Board Division of Clean Water Programs **UST Local Oversight Program** 1131 Harbor Bay Parkway Alameda, CA 94502-6577 (510) 567-6700

Kevin Graves California Regional Water Quality Control Board San Francisco Bay Region 2101 Webster Street, Suite 500 Oakland, CA 94612

Meeting to discuss and resolve issues of concern Subject:

regarding remedial action plans and risk assessment for ARCO Service Station 0608 located at 17601 Hesperian

Blvd., San Lorenzo, CA 94580

The meeting to discuss the subject site will be held on Tuesday, May 9, 1995 at 1:00 P.M.. The meeting location is Room 201 at:

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Please call me at (510)567-6755 if you need additional information.

Sincerely,

Amy Léech

Hazardous Materials Specialist

Distribution List

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Kevin Graves, RWQCB

Debra Moser, Pacific Environmental Group, Inc. Juliet Shin, Alameda County Dept. of Env. Health Keith Winemiller, Pacific Environmental Group, Inc.

Michael Whelan, ARCO Petrolem Products Co.

DAVID J. KEARS, Agency Director

R0255

RAFAT A. SHAHID, DIRECTOR

StId 779

April 20, 1995

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

Ravi Arulanantham California Regional Water Quality Control Board San Francisco Bay Region 2101 Webster Street, Suite 500 Oakland, CA 94612

Subject: Meeting to discuss and resolve issues of concern regarding remedial action plans and risk assessment for ARCO Service Station 0608 located at 17601 Hesperian Blvd., San Lorenzo, CA 94580

The meeting to discuss the subject site will be held on Tuesday, May 9, 1995 at 1:00 P.M.. The meeting location is Room 201 at:

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Please call me at (510)567-6755 if you need additional information.

Sincerely,

Amy Léech

Hazardous Materials Specialist

Distribution List
Ravi Arulanantham, RWQCB
Kevin Graves, RWQCB
Debra Moser, Pacific Environmental Group, Inc.
Juliet Shin, Alameda County Dept. of Env. Health
Keith Winemiller, Pacific Environmental Group, Inc.
Michael Whelan, ARCO Petrolem Products Co.

DAVID J. KEARS, Agency Director

StId #779

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0#255

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program

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

January 23, 1995

Michael Whelan ARCO Petroleum Products Co. P.O. Box 5811 San Mateo CA 94402

Subject: Comments on RI/FS for 17601 Hesperian Blvd., San

Lorenzo, CA 94580

Dear Mr. Whelan:

This office has completed a review of the Remedial Investigation/Feasibility Study (RI/FS) dated November 22, 1994, submitted by Pacific Environmental Group, Inc. (Pacific). Pacific has presented a recommended remedial action plan on behalf of ARCO. The decision to recommend Alternative 2 (No Action for Soil, Institutional Controls for Groundwater Off Site, Groundwater Extraction On Site) of the 5 remediation alternatives presented in the RI/FS was based on facts and assumptions made from this study.

On January 18, 1995, Juliet Shin and Amy Leech of this office spoke via conference call with Debra Moser and Keith Winemiller of Pacific to discuss questions and concerns we have about the RI/FS. Pacific indicated they would need approximately 45 days to respond to our questions. This letter is to summarize the questions and concerns this office has regarding the assumptions made in the RI/FS document.

- 1. Was the pump in extraction well EA-1 lowered as discussed during the July 8, 1994 meeting? If yes, was the capture zone for this new pump depth incorporated into the Fate and Transport Study (FTS)?
- 2. Sufficient data was not provided to prove that pumping of domestic irrigation wells is or is not affecting plume migration. Pacific agreed to request that the homeowners do not pump through 1995 to allow more time to determine if the pumping of domestic irrigation wells is a factor in plume migration. Furthermore, we urge ARCO to convince the remaining 4 homeowners who continue to pump, to stop pumping until the impact of off-site pumping is known.
- 3. If domestic irrigation wells are to be used as sentinel or boundary wells, then well construction of those wells should be defined. Based on the RI/FS proposal, well 633H is intended to be used as a boundary or trigger well. If that is to be the case, well construction details are required

Whelan ARCO Petroleum Products Co. January 23, 1995 Page 2 of 5

for this well. It is possible Well 633H is not showing detectable contamination because it is not screened properly.

4. An assumption was made in the FTS that the half-life (biodegradation rate) of 110 days for dissolved benzene is the most reasonable rate based on site lithology. A Sensitivity Study was also performed using a half-life of 250 days.

How do these rates compare to biodegradation rates provided by the EPA's Toxicological Profile for Benzene? Please provide us data that relates to similar subsurface conditions of the subject site.

5. How do we know that contaminant attenuation observed has been due to biodegredation as opposed to adsorption and dilution? It is difficult to predict that significant biodegradation is occurring within the groundwater, capillary fringe, and vadose zone at the source and downgradient of the source of contamination.

A study by Pacific dated October 12, 1993, was made on the feasibility of in-situ bioremediation of contaminated soil at the site. The study concluded that "...characteristics favorable to bioremediation were **not** sufficient to warrant further study."

Although a case comparison was made in the RI/FS to support the theory that groundwater characteristics are favorable to bioremediation at the ARCO site, we do not see enough evidence to support the assumption that the Case Study groundwater characteristics are "remarkably similar" to the ARCO site.

Because it is difficult to predict a biodegradation rate based on qualitative data, we recommend that a Fate and Transport Sensitivity Model Study be completed for a worse case scenario where biodegradation does not occur, i.e. the half-life for benzene is null.

Furthermore, on-site specific data should be collected to support that sufficient biodegredation is occurring in the groundwater. Examples of pertinent site-specific data are: comparison of dissolved oxygen levels and redox potential inside and outside the contaminant plume, concentrations of soluble iron immediately downgradient of the contaminant source compared to background, analysis of on-site microbial populations to determine if petroleum degraders exist.

Whelan ARCO Petroleum Products Co. January 23, 1995 Page 3 of 5

6. The model results from Scenario 2, for which the Remedial Action Plan is supported, indicates that the plume boundaries will recede approximately 350 feet in 1 year, just two years after the benzene release to the groundwater began. The data used to produce this plume behavior is from 1st Quarter 1994 (reported in March 1994). Data presented from 2nd and 3rd quarterly 1994 monitoring, do not show any recessionary trend which leads us to believe that the model is inaccurate.

Further, we know that the plume boundaries for dissolved benzene currently extend approximately 600 feet downgradient from the site, and the benzene release to the groundwater began to occur 7 or more years ago. If the rate of biodegradation suggested by the model were occurring, it would seem that greater evidence of plume boundary recession would have been more apparent after 7 plus years of monitoring.

It has been shown that benzene concentrations have decreased in the outlying domestic irrigation wells for the last 3 or more quarters. However to date, the plume boundaries have not appreciably receded upgradient toward the site.

The report states "...that groundwater from MW-10 is decreasing markedly in dissolved benzene...". Historical data presented thus far for MW-10, has exhibited sporadic fluctuations in benzene concentrations. If sufficient evidence is not provided to ensure that contaminant concentrations in MW-10 are significantly biodegrading or attenuating, a corrective action plan will be required to address containment/stabilization and, possibly, remediation of this off-site plume concentration.

7. What are the current soil contaminant concentrations on site? What is the future leaching potential for these soils? How long will these soils contribute to groundwater contamination?

The most recent data on soil contaminant concentrations on site for the UST gasoline complex and used oil tank location is 1988; and 1992 for the oil-water separator. Per our conversation with Pacific, it was stated that the future leaching of on-site soil contamination was incorporated into the FTS using a general leaching rate solely for benzene. We suggest using more current, site specific data for model calibration.

Whelan ARCO Petroleum Products Co. January 23, 1995 Page 4 of 5

Alternative 2, the recommended remedial action plan presented in the RI/FS, did not address remediation of the impacted on-site soils. However, the report indicates that the remaining soil contamination is expected to:

o require a long period of time to naturally attenuate and

o will further impact the on-site groundwater.

If residual soil contamination is in fact continuing to impact the ground water, then as stated in alternative 4, attempting to eliminate the ultimate source of contamination would seem warranted in this situation.

8. Although the on-site extraction system appears to have contributed to the reduction in contaminant migration since its operation began in 1991, MW-8 and MW-10, the closest monitoring wells downgradient of the site, continue to show elevated levels of TPHg and benzene. This data appears to indicate that contaminants continue to migrate off-site despite the on-site extraction system and/or that the contaminant plume in this area is not significantly biodegrading.

Further efforts in contaminant source reduction, as presented in Alternative 4 (Soil Vapor Extraction on Site, Institutional Controls for Groundwater Off Site, Air Sparging and Groundwater Extraction On Site) in the RI/FS and/or further investigations into the feasibility of offsite groundwater extraction from MW-10 should be considered as viable remediation efforts.

Intrinsic bioremediation could be a viable remediation strategy at sites where it can be shown that contaminants will not reach off-site receptors. However, this does not appear to be the case at the subject site. Numerous off-site domestic irrigation wells have been impacted, and although, the risk assessment performed has shown an acceptable range of health protection for the contaminant concentrations found at these wells thus far, it is this departments position that a conservative approach in remediation of the site is warranted. If sufficient evidence is not provided to indicate active bioremediation or stabilization of the plume has occurred, we recommend expending efforts toward active and effective source reduction and/or containment of the contaminant plume.

Whelan ARCO Petroleum Products Co. January 23, 1995 Page 5 of 5

Please contact us at (510)-567-6700 if you have questions.

Sincerely,

Hazardous Materials Specialist

Juliet Shin

Senior Hazardous Materials Specialist

 $lop\779rifs.195$

cc: Debra Moser

Pacific Environmental Group, Inc.

2025 Gateway Place, Suite 440

San Jose, CA 95110

Ed Howell

DAVID J. KEARS, Agency Director

R0255

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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

May 9, 1994

Mr. Michael Whelan ARCO Products Company P.O. Box 5811 San Mateo, CA 94402

STID 779

Re: The RI/FS schedule for 17601 Hesperian Blvd., San Lorenzo, California

Dear Mr. Whelan,

This office received Pacific Environmental's April 19, 1994 letter with the proposed Schedule of Work for the RI/FS work at the above site. This schedule is acceptable to this office. This letter also stated that the homeowners with wells located at 642 Hacienda, and 17371 and 17372 Via Magdelena refused to discontinue well use through 1994. Pumping of these wells should be discouraged because it may influence the migration of the contaminant plume and, furthermore, the homeowners should try and avoid any unnecessary exposures to contaminants, even though the Risk Assessment apparently determined that there would be no human health threat for estimated levels and exposure times. Therefore, this office is requesting that ARCO make further efforts to explain the risks of using the wells to the homeowners, in order to encourage them to reconsider their decision.

Lastly, it is the understanding of this office that ARCO is sampling the residential wells on a quarterly basis. However, no ground water sampling results for the residential wells were included in the last Quarterly Report, dated March 11, 1994. Please submit all recent lab analysis results for these ground water samples to this office.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

Michael Whelan

Re: 17601 Hesperian

May 9, 1994 Page 2 of 2

Deborah Moser cc:

Pacific Environmental Group 2025 Gateway Place, Ste 440 San Jose, CA 95110

Edgar Howell-File(JS)

AGEMOY david J. Keaps, ageny fredc

December 28, 1993

CERTIFIED MAILER #: P 422 218 164

Arco Station #00608 17601 Hesperian Blvd. San Lorenzo, 94580 RASSI A. SHANG, DARBER AGENCY Birector DEPARTMENT OF ENVIRONMENTAL HEALTH

naparodus Hareriac Dividion AU Swan Way, Am. 200 Cekland, CA 94621 (510) 271-4320

Re: FIVE-YEAR PERMITS FOR OPERATION OF UNDERGROUND STORAGE TANK(8) 17601 Hesperian Blvd. San Lorenzo, 94580

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.
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,

PAM EVANS

Sr HazMat Specialist

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

DAVID J. KEARS, Agency Director



R0255

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

February 18, 1993

Mr. Michael Whelan ARCO Products Company P.O. Box 5811 San Mateo, CA 94402

STID 779

RE: ARCO Service Station #0608, located at 17601 Hesperian Blvd., San Lorenzo, California

Dear Mr. Whelan,

This office has reviewed Pacific Environmental Group, Inc.'s work plan, dated February 4, 1993, presenting proposals for further investigations and various remediation options for the above site. This work plan is acceptable to this office. Per the conversation between Mr. Kelly Brown and myself on February 10, 1993, a minimum of one soil sample shall be analyzed from each of the off-site boring locations. Additionally, soil samples collected from on-site monitoring wells will be analyzed if there are any stains, odors, or readings on the Photoionization Detector observed from the samples.

From the above conversation, it is also our understanding that follow-up letters to the homeowners will be sent out in the next two weeks, after most of the homeowners have had the opportunity to respond to the January 1993 letters.

Lastly, any questions or discussions regarding the risk assessment should be referred to Ravi Arulananthanam. The work plan states that "the risk assessment results will be used in the RI/FS process to target remedial goals." However, please keep in mind that the possibility exists that the remedial goals established in the risk assessment may not be those acceptable to the regulating agencies.

Per the discussions in the meeting on February 5, 1993, field work shall commence, as outlined in the Remedial Investigation and Feasibility Study Schedule, immediately after the work plan is approved by this office.

Quarterly monitoring of the wells shall continue until this site qualifies for RWQCB "sign-off". If you have any questions or comments, please contact me at (510) 271-4530.

Mr. Michael Whelan

Re: ARCO Service Station #0608

Page 2 of 2

February 18, 1993

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Ravi Arulananthanam, Alameda County Health Dept.

Kelly Brown
Pacific Environmental Group, Inc.
2025 Gateway Place, Ste. 440
San Jose, California 95110

Keith Winemiller Pacific Environmental Group, Inc. 2025 Gateway Place, Ste. 440 San Jose, California 95110

Edgar Howell-File(JS)

SITE: 17601 Heapenan Blud, San Lorenzo: CA

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

DAVID J. KEARS, Agency Director

R0255

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

October 2, 1992

Mr. Michael Whelan ARCO Products Company P.O. Box 5811 San Mateo, CA 94402

STID 779

RE: Release from Oil/Water Separator and additional sample

analysis requirements

Dear Mr. Whelan,

In recently reviewing the report, dated August 1992, regarding the removal of the oil/water separator, it was noted that up to 3,300 ppm of Total Recoverable Petroleum Hydrocarbons (TRPH) was identified in the soils beneath the former oil/water separator.

You are required to submit a work plan addressing the remediation of this soil within 45 days of the receipt of this letter. Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). extensions of the stated deadlines or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

Additionally, it was noted that soil samples collected from beneath the former waste oil tank in 1988 exhibited high concentrations of oil and grease, however, no ground water samples to date appear to have been analyzed for oil and grease. Furthermore, it appears that soil and ground water samples collected from the vicinity of the former waste oil tank were never analyzed for chlorinated hydrocarbons, semi-volatiles, or metals as required by the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks. to this deficiency in sample analysis, you are required to analyze the ground water samples collected from MW-8 and MW-5, the nearest existing downgradient wells from the former waste oil tank, for these constituents.

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

Sincerely

Juliet Shin

Hazardous Materials Specialist

Mr. Michael Whelan RE: 17601 Hesperian Blvd. October 2, 1992 Page 2 of 2

cc: Richard Hiett, RWQCB

Jim Ferdinand, Eden Consolidated Fire Dept.

Brian Thomas EA Engineering, Science, and Technology 41 Lafayette Circle Lafayette, CA 94549

Kelly Brown
Pacific Environmental Group, Inc.
620 Contra Costa Blvd., Ste 209
Pleasant Hill, CA 94523

Edgar Howell-File (JS)

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

RAFAT A. SHAHID, Assistant Agency Director

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

June 5, 1992

Chuck Carmel
ARCO Petroleum Products Co.
P.O. Box 5811
San Mateo CA 94402

RE: ARCO Service Station 0608, 17601 Hesperian Blvd., San Lorenzo Contaminated Offsite Domestic Wells and Groundwater Remediation

Dear Mr. Carmel:

Environmental Health Department staff have reviewed the risk assessment, well sampling results and groundwater remediation data supplied by ARCO for the San Lorenzo site.

As outlined in the risk assessment and other documents supplied by ARCO, 10 domestic wells in the area west of station 0608 have been tested for the presence of petroleum fuel contaminants. ARCO is seeking access to test an additional 4 wells. Of the domestic wells tested, 4 contained detectable petroleum contaminants. We have identified the following issues of concern:

Increased Health Risk Levels Identified in Risk Assessment: The risk assessment identified increased health risks exceeding one in one million, yet concluded that no increased risk to the public exists. The purpose of a health risk assessment is to calculate risk, not to consider mitigation factors, particularly those over which ARCO has no control. The fact that risk has been determined to exceed 1:million indicates that mitigation actions are appropriate in this case. ARCO should explain these actions in depth in a separate document.

Completeness of the Risk Assessment: This document presents risk information for adults via oral and dermal exposure routes only. In order for the risk assessment to be considered acceptable and complete, it must also include:

- 1. Calculation of the total risk from exposures via oral, dermal and inhalation pathways. The exposures from these three routes must be added together to calculate total risk.
- 2. Separate oral, dermal and inhalation risk calculations for children must also be prepared using appropriate parameters.

Chuck Carmel ARCO Page 2 June 5, 1992

Offsite Well Use: We recognize that ARCO lacks legal authority to require domestic well owners to discontinue pumping and using groundwater. Nevertheless, offsite well pumping should cease until our public health risk concerns are addressed and it can be determined that ARCO's remediation efforts will not be compromised due to offsite well use. We encourage ARCO to take the lead in requesting well owner cooperation during this interim period.

Another issue of concern to this office is the effectiveness of the groundwater remediation system. The measures ARCO is currently taking appear inadequate for the extent of contamination. Only one extraction system is operating at the site, and this system does not appear to have a capture zone large enough to encompass the entire contaminant plume. In addition, continued pumping of private wells within the contaminated zone may lessen the effectiveness of the groundwater extraction system and expedite the migration of the contaminant plume.

The issues outlined above will be discussed further at the meeting scheduled for June 11, 1992 between ARCO and this office. In the interim, you may contact Ms. Juliet Shin with any questions at (510)271-4320.

Sincerely

Scott O. Seery, CHMM

Senior Hazardous Materials Specialist

c: Mark Thomson, Alameda County District Attorney's Office Eddy So, Regional Water Quality Control Board Michael Wheland, ARCO Kelly Brown, PEG, Inc. File (35)

ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

certified mailer #P 367 604 630

December 31, 1991 STID# 779 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Programs 80 Swan Way, Rm. 200 Oakland, CA 94621 XXX (510) 271-4320

Notice of Requirement to Reimburse

O.E. Bohannon Trust P.O. Box 2485

Los Angeles, CA 90051

ARCO Petroleum Products Co.

ATTN: Chuck Carmel

P.O. Box 5811

San Mateo, CA 94402

ARCO Svc. Sta.# 0608 17601 Hesperian Blvd. San Lorenzo, CA 94580

SITE

Responsible Party Property Owner

Responsible Party Tank Operator

Date First Reported: 11/25/85 Substance: gasoline Petroleum (X) Yes

The federal Petroleum Leaking Underground Storage Tank Trust Fund (Federal Trust Fund) provides funding to pay the local and state agency administrative and oversight costs associated with the cleanup of releases from underground storage tanks. The legislature has authorized funds to pay the local and state agency administrative and oversight costs associated with the cleanup of releases from underground storage tanks. The direct and indirect costs of overseeing removal or remedial action at the above site are funded, in whole or in part, from the Federal Trust Fund. The above individual(s) or entity(ies) have been identified as the party or parties responsible for investigation and cleanup of the above site. YOU ARE HEREBY NOTIFIED that pursuant to Title 42 of the United States Code, Section 6991b(h)(6) and Sections 25297.1 and 25360 of the California Health and Safety Code, the above Responsible Party or Parties must reimburse the State Water Resources Control Board not more than 150 percent of the total amount of site specific oversight costs actually incurred while overseeing the cleanup of the above underground storage tank site, and the above Responsible Party or Parties must make full payment of such costs within 30 days of receipt of a detailed invoice from the State Water Resources Control Board.

If you have any questions concerning this matter please contact. Thomas Peacock, Supervising Hazardous Material Specialist, at this office.

Edgar B. Howell, III, Chief Contract Project Director

LauBHorth

Notice of Requirement to Reimburse ARCO Svc. Sta. #0608 STID 779 December 31, 1991 Page 2 of 2

cc: Sandra Malos, SWRCB

SWRCB Use :

add: X Reason: New case



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

December 31, 1991

Arco Petroleum 17601 Hesperian Blvd. San Lorenzo CA 94580 Attn: Jaime Abadam

RE: FIVE YEAR UNDERGROUND STORAGE TANK OPERATING PERMIT

Arco Station #00608, 17601 Hesperian Blvd., San Lorenzo

Dear Mr. Abadam:

Please find enclosed a five year permit to operate three single walled underground storage tanks with single walled pressure piping and a single walled waste oil tank with single walled gravity piping at the subject facility. To operate under a valid permit, you are required to comply with the conditions as described in the revised Title 23, California Code of Regulations (CCR) adopted effective August 9, 1991. The conditions are summarized below:

- 1) The owner or operator shall comply with the reporting and recording requirements for unauthorized releases, specified in Article 5.
- 2) Written records of all monitoring and maintenance performed shall be maintained for a period of at least three (3) years. These records must be made available, upon request within 36 hours, to a representative of this office.
- An operating permit may be transferred to a new underground storage tank owner if all of the following are met: the new owner does not change any conditions of the permit; the transfer is registered with this office within 30 days of the change in ownership; and the tank permit application forms are completed to show the changes. Upon receiving the ownership transfer request this office may review, modify, or terminate the permit to operate the underground storage tank(s).

ARCO Station 0608 December 31, 1991 Page 2 of 3

Title 23 specifies that non-visual monitoring/quantitative release detection be performed. The following methods may be utilized:

- a) SINGLE WALLED UNDERGROUND STORAGE TANKS, Section 2643 (c) (2) (A&B);
 - annual tank integrity test, AND
 - monthly inventory reconciliation
- b) PRESSURIZED PIPING, Section 2643(d);
 - hourly automatic line leak detector, AND
 - annual line tightness test

You may utilize other release detection methods for tanks and piping as outlined in Appendix IV of Title 23, CCR. Enclosed is a copy of Appendix IV for your reference. You are required to send written notification to this office regarding any changes in the current monitoring methods.

Inventory reconciliation is an integral part of the non-visual monitoring/quantitative release detection method. The following summary is taken from Title 23, Section 2646.

- a) The daily variation in inventory reconciliation shall be the difference between the physically measured inventory in storage and the calculated inventory in storage. Daily variations shall be summed for a period of one month. Monthly variations exceeding a variation of 1% of the monthly tank delivery plus 130 gallons must be investigated in accordance with this section. Please find enclosed a sample worksheet to perform inventory reconciliation.
- b) You are required to submit on an ANNUAL basis, a statement to this office which states that all inventory reconciliation data are within allowable variations or, submit a list of the days and corresponding variations which exceeded the allowable variations. Said statement shall be executed under penalty of perjury.

Please note that after January 1, 1993, inventory reconciliation, and any other leak detection method that utilizes manual stick readings, shall NOT be used as part of non-visual monitoring for existing underground storage tanks, where the ground water level or the highest anticipated ground water level is less than 20 feet below the bottom of the tank. If this applies to tanks you operate then you are required to then select another release ARCO

Station 0608 December 31, 1991 Page 2 of 3

detection method(s) for tanks and piping as out-lined in Appendix IV.

Consult the revised Title 23, CCR for additional requirements. To obtain a copy of the amended regulations, you may contact the State Water Resources Control Board at (916) 657-0917.

You may contact me with any questions at (510) 271-4320.

Sincerely,

Pamela J. Evans

Hazardous Materials Specialist

c: Susan Hugo, ACHCSA
S. L. Douglas, ARCO
James Ferdinand, Eden Consolidated Fire Protection District

Enclosures



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

December 23, 1991

Chuck Carmel ARCO Petroleum Products Co. P.O. Box 5811 San Mateo CA 94402

RE: ARCO Service Station 0608, 17601 Hesperian Blvd., San Lorenzo

Dear Mr. Carmel:

Thank you for your quick response to my request for updated information on the above referenced site. As we have been unable to reach one another by telephone for follow up, I am writing to request the following additional information:

- 1. Analytical results of your domestic well sampling activities by January 23, 1991.
- 2. ARCO's plan for future groundwater monitoring. Please specify which of the many onsite and offsite wells you plan to monitor during the course of your groundwater remediation activities. Also, please indicate your monitoring frequency and duration.

You may contact me with any questions at (415)271-4320.

Sincerely,

Pamela J. Evans

Hazardous Materials Specialist

c: Mark Thomson, Alameda County District Attorney's Office Eddy So, Regional Water Quality Control Board Tina Berry, PEG, Inc.

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

August 23, 1991

Arco Petroleum 17601 Hesperian Blvd. San Lorenzo, CA 94580 Attn: Jaime Abadam

SUBJ: Five-Year Permit to Operate Four Underground Storage Tanks at Arco Station #00608, 17601 Hesperian Blvd., San Lorenzo, California 94580

Dear Mr. Abadam:

On August 15, 1991, Maria Mendoza from our office inspected the above premises. The inspection was performed to evaluate whether the conditions for the 5-year underground storage permit were being met prior to its issuance.

As you are aware, four double-walled underground storage tanks (three 12,000-gallon product and one 550-gallon waste oil) exist at the subject facility. In order to comply with Title 23, California Code of Regulations (CCR) and related Health and Safety Code (H&SC), you must perform the following actions:

1) Section 2632(d)(1) or 2634(d)(2), CCR - Please submit a site specific written routine monitoring plan/procedure. You are required to submit this plan to our agency. This plan includes, where applicable: the frequency of performing the monitoring method, the methods and equipment to be used for monitoring, where monitoring will be performed, the location(s) from which the monitoring will be performed, the name(s) and title(s) of the person(s) responsible for monitoring/maintaining the equipment, and the reporting format.

Please be advised that the written monitoring plan should include calibration and/or maintenance schedule for the monitoring equipment(s) e.g. Raychem TraceTek TTG Multiple-Channel Alarm Module electronic leak detection system, continuous pipeline leak detector test, etc. The maintenance schedule shall be in accordance with the manufacturer's instructions. Also, as part of the monitoring plan, please include a description of training needed for the operation of the monitoring equipment(s);

Arco Station #00608 August 23, 1991 Page 2 of 3

- 2) Section 2632(d)(2), Title 23, CCR Please submit a site specific spill/leak response plan. Per the above section, you are required to submit this plan to our office. The written spill/leak response plan should demonstrate that in the event of an unauthorized release, product would be removed from the secondary container within the shortest possible time. It should include at least the following:
 - a) A description of the proposed methods and equipment to be used for removing the gasoline or waste oil, including the location and availability of the required equipment, if not permanently onsite, and an equipment maintenance schedule for the equipment located on-site.
 - b) The name(s) or title(s) of the person(s) responsible for authorizing the work to be performed.
- 3) <u>Section 2635, Title 23, CCR</u> <u>Submit as-built documents</u> to our office. Per the above section, you are required to submit these documents to our office and should include at least the following:
 - a) Drawings that show the locations of all tanks, piping, sumps, overfill basins, etc. Label all drawings shown;
 - b) Materials used for tank and piping (i.e. brands, single or double-walled, steel or PVC, etc.)
 - c) Locations and type of equipment used for continuous leak detection. Include types of probes and probe positions.

Please note that records must be kept on-site for at least three (3) years. In addition to the written monitoring plan and spill leak response plan, this should include precision tests, leak detector tests, records for equipment repair and any other pertinent record.

Arco Station #00608 August 23, 1991 Page 3 of 3

Submit all the required materials to this office within 10 working days, i.e. no later than September 9, 1991. A follow-up inspection will be conducted upon receipt and review of the required documents, and a five-year operating permit will be issued when the above requirements are met.

Failure to respond in a timely manner could result in civil liabilities under the Health and Safety Code.

Should you have any questions or concerns regarding the contents of this letter, please feel free to contact either Maria Mendoza or myself, at (415) 271-4320.

Sincerely,

Pamela Evans, HazMat Specialist Hazardous Materials Division

MAM: mam

cc: Elaine Lavine, Arco Petroleum Co.

Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection Division

Files

DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621



March 21, 1991

P.O. Box 5811

San Mateo CA 94402

(415)Chuck Carmel ARCO Petroleum Products Co.

PEG Workplan for ARCO Service Station 0608 17601 Hesperian Blvd., San Lorenzo

Dear Mr. Carmel:

I have reviewed the workplan submitted by Pacific Environmental Group for the the above referenced site. The workplan and timetable are acceptable to this office. I spoke with Tina Berry today, who stated that PEG would proceed to implement the workplan.

You may contact me with any questions at (415)271-4320.

Sincerely,

Pamela J. Evans

Hazardous Materials Specialist

Camela 9 Evans

c: Richard Hiett, Regional Water Quality Control Board Tina Berry, PEG, Inc.

January 8, 1991

Mr. Kyle Christie ARCO Petroleum Products Co. P.O. Box 5811 San Mateo CA 94402 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

RE: ARCO Service Station 0608, 17601 Hesperian Blvd., San Lorenzo

Dear Mr. Christie:

In June, 1988 ARCO was required by this office to submit a remediation plan for the petroleum fuel contamination present at the above referenced site. In July, 1988 a plan was submitted on ARCO's behalf by Pacific Environmental Group, Inc. Included in the plan was a timetable for remediation activities. The extent of on and offsite contamination was to have been investigated and reported by May, 1989. A remedial action plan was to have been submitted by June, 1989, and a remediation system was to have been in operation by April, 1990. PEG's plan was reviewed and accepted by this office by July, 1988.

Since that time, onsite monitoring wells have been sampled regularly and additional on and offsite wells have been installed. PEG has replaced 3 old wells closest to the apparent source of contamination with an extraction well.

The 3rd Quarter Summary Report dated 10/15/90 establishes that groundwater contamination has moved offsite. Monitoring wells located to the north and west of the property contained levels of gasoline ranging from 63 to 12,000 ppb at the time of the June, 1990 sampling. These findings necessitate that ARCO undertake the following:

- 1. Further investigation in order to define the contaminant plume;
- 2. Diligent action to contain the plume and mitigate it's impact;
- 3. Evaluation of the impact to the approximately 23 wells known to exist within .5 miles of the site. These wells are listed in a report prepared by Applied GeoSystems for ARCO, dated 3/9/88.

You are required to submit to this office no later than February 15, 1990, a detailed workplan that addresses the above items and that gives a timetable for completion of your investigation and the implementation of your remediation plan. A copy should also be sent

Kyle Christie ARCO RE: ARCO Station 0608 January 8, 1991 Page 2 of 2

to the Regional Water Quality Control Board. Any extension beyond the February 15 due date must be agreed upon in advance and confirmed in writing. Failure to respond in a timely manner may result in referral of this case to either the RWQCB or the Alameda County District Attorney's Office for further action.

In addition, you must submit a payment of \$500 to this office in order to cover agency oversight costs. You may contact me with any questions at (415)271-4320.

Sincerely,

Pamela J. Evans

Gamela growns

Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney's Office Richard Hiett, Regional Water Quality Control Board Howard Hatayama, Department of Health Services Terry Gyrion, PEG, Inc. Debra Moser, PEG, Inc. Department of Environmental Health

R0255

Certified Mail # P 691 214 983

Hazardous Materials Div. 80 Swan Way, Rm. 200 Oakland, CA 94621

June 30, 1988

Mr. Kyle Christie, Environmental Engineer Arco Petroleum Products 2000 Alameda De Las Pulgas P.O. Box 5811 San Mateo, CA 94403

RE: UNDERGROUND TANK INSTALLATION AT 17601 HESPERIAN BLVD., SAN LEANDRO, CA

Dear Mr. Christie:

Pursuant to the meeting you had with Ed Howell and Larry Seto, on June 27, 1988, concerning remediation at the above site. After contact with the Regional Water Quality Control Board, the following information needs to be submitted to our office:

- A remediation plan stating the method for soil and ground water clean-up. This does not need to be a detailed engineer or geological plan.
- 2. Date when remedial investigation will commence.
- 3. Date when remedial system will be implemented.

Once this information is received and accepted, we will respond by letter, once installation plans are approved, then construction may be resumed.

If you have any questions, please contact Larry Seto, Hazardous Materials Specialsit, at 271-4320.

Sincerely,

Rafat A. Shahid, Chief,

Hazardous Materials Division

RAS:LS:mnc

cc: Gil Jensen, Alameda County District Attorney, Consumer & Environmental Protection Agency
Dwight Hoenig, DOHS
Pete Johnson, RWQCB
Rick Henderson, Golden West Builders
Robert Wenzlan, Pacific Environmental Group

Certified Mailer #P 691 214 997

Telephone Number: (415) 271-4320

June 24, 1988

Mr. Kyle Christie, Environmental Engineer Arco Petroleum Products 2000 Alameda de las Pulgas P. O. Box 5811 San Mateo, CA 94402

SUBJECT: ILLEGAL INSTALLATION OF UNDERGROUND TANKS AT 17601 HESPERIAN BLVD., SAN LORENZO 94580

Dear Mr. Christie:

Our office was informed on June 23, 1988 by Rick Henderson of Golden West Builders that three (3) underground tanks were installed at the above site on June 20, 1988. They were installed without the approval of our office. All work pertaining to this illegal installation must stop immediately. Before work resumes, a check for \$750.00 must be received by our office for this illegal installation as per Section 3-141.6 of the ordinance code of the County of Alameda. Also, your installation plan previously submitted must be approved by our office.

Should you have any questions regarding this letter, please contact Larry Seto, Hazardous Materials Specialist at 271-4320.

Sincerely,

Rafat A. Shahid, Chief

Hazardous Materials Division

RAS: LS: mam

cc: Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection Agency Dwight Hoenig, DOHS

R0255 (?)

#17601 Hesperian Blud

"Arco # 00608"

ird Floor iia 94612

April 6, 1988

Mr. Chase Jiannalone, Project Engineer Arco Petroleum Products P.O. Box 5811 San Mateo, CA 94402

RE: Fiberglass Lining Of Steel Underground Tanks At: 1701 Hesperian Blvd., San Lorenzo, CA 94580

Dear Mr. Jiannalone:

After consultation with the Regional Water Quality Control Board and Fremont Fire Department, fiberglass lining of your leaking underground tanks will not be acceptable. Your leaking tank must be replaced with a double wall tank, with double wall piping.

In addition, the soil samples collected beneath the tanks must be analyzed for benzene, toluene, xylene and ethylbenzene, in addition to total petroleum hydrocarbon.

If you have any questions, please call Larry Seto, Hazardous Materials Specialist, at 271-4320.

Sincerely,

Rafat A. Shahid, Chief,

RICA.SW

Hazardous Materials Division

RAS:LS:mnc

cc: Jim Lambert, Applied Geosystems

Greg Zentner, RWQCB

Eugene Walker, Eden Consolidated Fire

RO 255

470-27th Street, Third Floor Oakland, California 94612 (415)874-7237

January 25, 1988

Mr. John Lambert Applied Geosystems 43255 Mission Blvd., Suite B Fremont, CA 94539

Dear Mr. Lambert:

We have received your deposit/refund check for \$150.00, for the removal of an additional tank at Arco Service Station, 17601 Hesperian Blvd., San Lorenzo. If this additional tank is going to be removed in the same manner as the other four tanks in the previously submitted closure plan, no additional closure plan is required. However, if different, an additional closure plan must be submitted for our approval.

If you have any questions, please contact, Larry Seto, Hazardous Materials Specialist, at 874-7237.

Sincerely,

Rafat A. Shahid, Chief,

RICA.SM

Hazardous Materials Division

RAS: LS: mnc

cc: Larry Seto

Files



470-27th Street, Third Floor Oakland, California 94612 (415) 874-7237

January 12, 1988

Mr. John Lambert Applied Geosystems 43255 Mission Blvd., Suite B Fremont, CA 94539

Dear Mr. Lambert:

Your closure plan has been accepted for the removal of four (4) underground storage tanks at Arco Service Station, at 17601 Hesperian Blvd., San Lorenzo, CA.

Please contact Larry Seto, Hazardous Materials Specialist, at 874-7237, at least twenty-four (24) hours before commencing the removal.

Sincerely,

Rafat A. Shahid, Chief,

Hazardous Materials Division

RAS:LS:mnc



470-27th Street, Third Floor Oakland, California 94612 (415) 874-7237

December 28, 1987

Mr. John Lambert Applied Geosystems 43255 Mission Blvd., Suite B Fremont, CA 94539

Dear Mr. Lambert:

We have received your site plan and closure plan for the removal of four (4) tanks at Arco Service Station, 17601 Hesperian Blvd., San Lorenzo. Before your closure plan can be accepted, the following information must be submitted in writing:

- 1. Name of contractor
- 2. Name of licensed hazardous hauler
- Location of tank cleaning (on-site or off-site)
- 4. Name of disposal facility

If you have any questions concerning this matter, please contact Lawrence Seto, Hazardous Materials Specialist at 874-7237.

Sincerely,

Rafat A. Shahid, Chief

Hazardous Materials Division

RAS: LS: mam

cc: Larry Seto

File

470-27th Street, Third Floor
Oakland, California 94612
(415)874-7237

Certified Mail #P 119 024 062

December 7, 1987

Mr. Ron Miles Arco Petroleum Products P.O. Box 5811 San Mateo, CA 94402

Dear Mr. Miles:

Our office was informed by Becker Industries, inc., that your regular leaded underground storage tank at 17601 Hesperian Blvd., San Lorenzo, CA, failed it's Petro-tite hydrostatic tank test on October 20, 1987, and the retest on November 2, 1987.

- Section 25189(d), California Health & Safety Code states that, "any person who negligently disposes or causes the disposal of any hazardous or extremely hazardous waste, at a point which is not authorized, shall be subject to a civil penalty of not more than twenty-five thousand (\$25,000) dollars for each violation.
- Section 66328(d), California Administrative Code, Title 22, states that, if corrections are needed, the operator shall provide the Department with a written plan of correction, which states the actions to be taken and the expected dates of completion.

Please submit to our office, your plan of correction within thirty (30) days of the receipt of this letter. Your plan must include, but is not limited to the following:

- Worker's Health and Safety Plan
- Method(s) to be used to determine the lateral and vertical extent of the contamination
- 3. Name of licensed hazardous waste hauler if needed
- 4. Name of disposal site if needed

Mr. Ron Miles Arco Petroleum Products San Mateo, CA 94402 December 7, 1987 Page 2 of 2

Please be advised that when your plan of correction is submitted, you will be requested to submit a deposit check as per the Underground Tank Ordinance, Section 3-140.4.

Although the County of Alameda is the lead agency at this time, the Regional Water Quality Control Board has responsibilities for overseeing the underground fuel tank leak cases.

If you have any questions, please contact Larry Seto, Hazardous Materials Specialist, at 874-7237.

Sincerely,

ALCA She

Rafat A. Shahid, Chief, Hazardous Materials Division

RAS: LS: mnc

cc: Pete Johnson, RWQCB

Gil Jensen, Alameda County District Attorney, Consumer & Environmental
Protection Agency

Dwight Hoenig, DOHS Jim Abadam, Service Station Owner