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

June 22, 2006

Paul Supple
BP West Coast Products LLC
PO Box 6549
Moraga, CA 94549

Mirazim and Afsar Shakoori
Castro Valley Chevron
3519 Castro Valley Blvd.
Castor Valley, CA 94546

Subject: Fuel Leak Case No. RO0000346, BP Station # 11105, 3519 Castro Valley Blvd., Castro Valley, CA

Dear Mr. Supple: Mirazim and Afsar Shakoori

Alameda County Environmental Health (ACEH) staff has reviewed recently submitted report entitled, "First Quarter '06 Groundwater Monitoring Event", dated March 20, 2006 and prepared on your behalf by SOMA Environmental Engineering, Inc. ACEH agrees with the recommendations to perform a sensitive receptor survey for the site. In addition, ACEH request a well survey be conducted for the site incorporating both California Department of Water Resources well data and Alameda County Department of Public Works well data.

Residual concentrations of petroleum hydrocarbon constituents exist downgradient of the site, as confirmed by groundwater analytical results of offsite monitoring wells SOMA-3, SOMA-4 and MW-7. However the concentrations of the constituents of concern are not increasing given the likelihood that in-situ biodegredation of contamination is occurring in groundwater, it appears that the groundwater contamination plume is stable and that off site migration seems to be limited. However, ACEH requests that quarterly groundwater monitoring and sampling be continued to confirm that off site plume migration is not occurring.

We request that you address the following technical comments and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Groundwater Monitoring.** Quarterly groundwater monitoring shall be continued for this site. Please continue quarterly groundwater monitoring and submit the results in quarterly groundwater monitoring reports requested below.

2. **Well Survey.** ACEH request that you locate all wells (monitoring and production wells: active, inactive, standby, decommissioned, abandoned dewatering, drainage and cathodic protection wells) within ½ mile of the subject site. We request that you obtain well information from both Alameda County Public Works Agency and the State of California Department of Water Resources, at a minimum. Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. Please present your results in the Well Survey Review requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Steven Plunkett), according to the following schedule:

- **August 15, 20006** – Well Survey Review
- **September 15, 2006** - Quarterly Monitoring Report for the Third Quarter 2006
- **December 15, 2006** - Quarterly Monitoring Report for the Fourth Quarter 2006
- **March 15, 2007** - Quarterly Monitoring Report for the First Quarter 2007
- **June 15, 2007** - Quarterly Monitoring Report for the Second Quarter 2007

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

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

If you have any questions, please call me at (510) 383-1767.

Sincerely,

Steven Plunkett
Hazardous Materials Specialist

cc: Ms. Lynelle Onishi

URS Corporation Inc.
1333 Broadway, Suite 800
Oakland, CA 94601

Mr. Mansour Sepehr
SOMA Environmental Engineering Inc.
6620 Owens Drive, Suite A
Pleasanton, CA 94588

Donna Drogos, ACEH
Steven Plunkett, ACEH
File

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

ST 03-22-04

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

RO0000346

March 22, 2004

Mr. Paul Supple
ARCO
P.O. Box 6459
Moraga, CA 94570

Mr. Azim Shakoori
Castro Valley Chevron
3519 Castro Valley Blvd
Castro Valley, CA 94546

RE: Workplan Approval for BP Station #11105 at 3519 Castro Valley Blvd., Castro Valley, CA

Dear Messrs. Supple and Shakoori:

I have completed review of SOMA Environmental Engineering, Inc's March 2004 *Workplan for Monitoring Well Installation* report prepared for the above referenced site. Four (one onsite, and three offsite) groundwater monitoring wells are proposed to delineate the extent of the contaminant plume. Proposed well SOMA-1 will initially be drilled to 15 feet bgs and will remain open for at least several hours to ascertain if a significant perched water-bearing zone exists.

Please be advised that the perched water layer should be verified before proceeding with the completion of the other three wells. My recent review of boring logs at the site identified PID/petroleum odor at 10 to 15 feet bgs in boreholes MW-1/ESE-1, MW-2/ESE-2, MW-3/ESE-3, MW-5/ESE-5, MW-8, TWB-4, and TWB-5. Some of these boreholes are 100 to 150 feet from the former UST pit. Contamination at these depths can only have been transported by groundwater.

The proposed workplan is acceptable. Field work should commence within 90 days of the date of this letter, or by June 22, 2004. Please provide at least 72 hours advance notice of field activity. If you have any questions, I can be reached at (510) 567-6762 or by email at eva.chu@acgov.org.

eva chu
Hazardous Materials Specialist

c: Donna Drogos
email: Mansour Sepehr, SOMA

bp11105-5

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

01-2B-04

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

RO0000346

January 23, 2004

Mr. Scott Hooton
BP Oil
295 SW 41st Street, Bldg 13, Ste N
Renton, WA 98055-4931

Mr. Azim Shakoori
Castro Valley Chevron
3519 Castro Valley Blvd
Castro Valley, CA 94546

RE: Workplan for BP Station #11105 at 3519 Castro Valley Blvd., Castro Valley, CA

Dear Messrs. Hooton and Shakoori:

I have completed review of Soma's December 2003 *Off-Site Soil and Groundwater Investigation* report prepared for the above referenced site. Five soil borings were advanced offsite to delineate the extent of the contaminant plume. Groundwater from Boring TWB-5 contained 32,000ppb TPHg, 500ppb benzene, and 9.5ppb MTBE. Groundwater from borings TWB-1 through TWB-3 contained MTBE ranging from 8.5 to 89ppb. Contaminant concentration in boring TWB-5 appears anomalous and may be due to an offsite contamination from 3459 Castro Valley Blvd.

At this time, permanent groundwater monitoring wells are required offsite to monitor the contaminant plume. A workplan for the installation of offsite wells should be submitted to this office for review within 90 days of the date of this letter, or by **April 26, 2004.** Be advised that groundwater hydrogeology at the site is rather complex. It is not clear if groundwater at the site is under confined conditions and/or perched water at approximately 9 feet bgs. A thorough review of site investigation reports prepared for neighboring sites is strongly recommended before proposed well locations are sited. Replacement wells for ESE-3 and ESE-4 may not be warranted. However, a short-screen well (screened from 10 to 15 feet bgs) may provide more representative groundwater contamination concentrations in the vicinity of ESE-2.

If you have any questions, I can be reached at (510) 567-6762 or by email at echu@co.alameda.ca.us.

eva chu
Hazardous Materials Specialist

c: Donna Drogos
email: Mansour Sepehr, Soma

bp11105-4

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

10-23-03

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

RO0000346

October 22, 2003

Mr. Scott Hooton
BP Oil
295 SW 41st Street, Bldg 13, Ste N
Renton, WA 98055-4931

Mr. Azim Shakoori
Castro Valley Chevron
3519 Castro Valley Blvd
Castro Valley, CA 94546

RE: Workplan Approval for BP Station #11105 at 3519 Castro Valley Blvd., Castro Valley, CA

Dear Messrs. Hooton and Shakoori:

- I have completed review of Soma Environmental Engineering, Inc's (Soma) October 8, 2003 *Revised Workplan to Conduct Off-site Soil and Groundwater Investigation* prepared for the above referenced site. Soma proposed to advance five direct-push technology boreholes offsite to delineate the horizontal and vertical extent of the contaminant plume. Soil samples will be collected at the soil/water interface and below groundwater elevation. Soil and water samples will be analyzed for TPHg (using Method 5030/8015), BTEX and MTBE and other ether oxygenates (using Method 8260).

The amended workplan is acceptable and should be implemented within 60 days of the date of this letter, **or by December 29, 2003.** Please provide at least 72 hours advance notice of field activities. If you have any questions, I can be reached at (510) 567-6762 or by email at echu@co.alameda.ca.us.

eva chu
Hazardous Materials Specialist

c: Donna Drogos
email: Mansour Sepehr, Soma

bp11105-3

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

10-6-03

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

RO0000346

October 3, 2003

Mr. Scott Hooton
BP Oil
295 SW 41st Street, Bldg 13, Ste N
Renton, WA 98055-4931

Mr. Azim Shakoori
Castro Valley Chevron
3519 Castro Valley Blvd
Castro Valley, CA 94546

RE: Amended Workplan for BP Station #11105 at 3519 Castro Valley Blvd., Castro Valley, CA

Dear Messrs. Hooton and Shakoori:

I have completed review of Soma Environmental Engineering, Inc's (Soma) September 25, 2003 *Workplan to Conduct Off-site Soil and Groundwater Investigation* prepared for the above referenced site. Soma proposed to advance five direct-push technology boreholes. Below are my comments.

- Proposed boreholes TWB-4 and TWB-5 are in excess of 250 feet from the site. These two borings should be moved closer to the site (recommend they be advanced in the parking area approximately 125 feet south of the site).
- Soma proposed to collect a soil sample from the soil/water interface for contaminant analysis. In order to delineate the vertical extent of the plume, soil samples should be collected below groundwater elevation as well for laboratory analysis. Soil samples should be selected based on lithologic changes, PID reading, or other field screening methods. All samples should be analyzed for BTEX/MTBE and other ether oxygenates using Method 8260 (not 8021B).

Please amend the workplan to address the above comments. The amended workplan is due within 30 days of the date of this letter, **or by November 5, 2003.** If you have any questions, I can be reached at (510) 567-6762 or by email at echu@co.alameda.ca.us.

eva chu
Hazardous Materials Specialist

c: Donna Drogos
email: Mansour Sepehr, Soma

bp11105-2

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

06-16-03

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

RO0000346

June 16, 2003

Mr. Scott Hooton
BP Oil
295 SW 41st Street, Bldg 13, Ste N
Renton, WA 98055-4931

Mr. Azim Shakoori
Castro Valley Chevron
3519 Castro Valley Blvd
Castro Valley, CA 94546

RE: Plume Delineation at former BP Station #11105 at 3519 Castro Valley Blvd., Castro Valley, CA

Dear Messrs. Hooton and Shakoori:

I have completed review of the case file, including the most recent URS report dated April 2003, titled *First Quarter 2003 Groundwater Monitoring Report*, for the above referenced site. Soil borings and groundwater monitoring wells completed at the site identified fuel hydrocarbon constituents in soil and groundwater. Groundwater flow direction has ranged from south to easterly. Currently, well ESE-2, located downgradient from the UST complex contains approximately 2,800 ppb TPHg and 4,800 ppb MTBE. Well MW-7, located further downgradient of ESE-2, contains 620 ppb TPHg and 1,100 ppb MTBE.

At this time, additional investigations are required to delineate the horizontal and vertical extent of the MTBE plume. A workplan for this phase of investigation is due within 60 days of the date of this letter, or by **August 18, 2003.** The proposed work should provide evidence as to whether the first encountered water is under confined conditions.

If you have any questions, I can be reached at (510) 567-6762 or by email at echu@co.alameda.ca.us.

eva chu
Hazardous Materials Specialist

c: Donna Drogos
email: Leonard Niles, URS

bp11105-1

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

RO346

July 26, 1999

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

Azim Sakoori
Owner/Operator
Castro Valley Chevron
3519 Castro Valley Boulevard
Castro Valley CA 94546

STR 3423

Subject: Cathodic Protection system maintenance for motor vehicle fuel tanks, Castro Valley Chevron, 3519 Castro Valley Boulevard, Castro Valley CA 94546

Dear Mr. Sakoori:

This letter is an addendum to the operating permit issued to you on December 19, 1998. The subject of this letter is the cathodic protection system installed in December 1998 in order to bring the underground storage tanks (USTs) into compliance for the December 22, 1998 deadline.

The cathodic protection system is an impressed current system designed by Corrpro Companies Incorporated. The system is required to be inspected within six months of installation to determine if the protection is adequate. If this inspection has been performed then please forward those reports. However, if the post-installation tests have not been performed, immediately contact this office and schedule the required tests.

Title 23 of the California Code of Regulations section 2635(a)(2) mandates that criteria used to determine that cathodic protection is adequate as required by this section shall be in accordance with a code of practice developed in accordance with voluntary consensus standards. Recommendations from the corrosion engineers are required to be followed if they represent the consensus standards for the industry. But at a minimum the impressed-current cathodic protection systems shall be inspected no less than **every 60 calendar days** to ensure that they are in proper working order. The inspections shall be documented and records maintained for three years. The determination of proper working order shall be defined by your corrosion engineers. Contact your contractor for information on performing and recording the 60 day checks.

This impressed current system is required to be field inspected by a cathodic protection authority at least every three years to confirm proper functioning. That inspection will be performed **no later than December 2001.**

The electronic monitoring system certification (Veeder Root TLS 350) and the annual pressurized piping tests are due in the month of **November**. Please forward a copy of all test results to this office within 30 days of the report. The annual summary of automatic tank gauging reports are due by January 30 of each year beginning with the year 2000.

If you have any questions regarding the operation of this tank system please contact me at (510) 567-6781.

Sincerely,

Robert Weston
Sr. Hazardous Materials Specialist

c: Tom Peacock, ACDEH
Scott Seery, ACDEH LOP

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

~~June 8, 1999~~ 10546

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

STID 3423

Mr. Scott Hooton
BP Oil Company
Environmental Remediation Management
295 SW 41st Street
Renton, WA 98055-4931

RE: BP Oil Site #11105, 3519 Castro Valley Boulevard, Castro Valley – Sampling Schedule

Dear Mr. Hooton:

I noticed recently that the well sampling and monitoring frequencies for this site were modified without seeking approval from this office. I contacted your sampling contractor, Blaine Tech Services ("Blaine"), and learned that, in fact, the schedule had been changed recently, apparently at your direction. Although adjustments in schedules may appear acceptable at certain times in some cases, to implement a change without approval by the local agency is unacceptable.

Nevertheless, I reviewed the "new" schedule for this site, transmitted to me by Blaine at my request (copy attached). The changes Blaine has implemented appear to be appropriate for all but one well, MW-7. From this point forward, well MW-7 is to be sampled and monitored following the same schedule as ESE-5, i.e., on a "biannual" schedule.

Additionally, the latest quarterly sampling report (4th quarter 1998) was submitted absent endorsement by a California-registered geologist or engineer. As you know, such is required under provisions of the Business and Professions Code. Please ensure that this endorsement is provided in all future reports.

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

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachment

cc: Chuck Headlee, RWQCB
Bob Chambers, Alameda County District Attorney's Office
Francis Thie, Blaine Tech Services, 1680 Rogers Ave., San Jose, CA 95112-1105

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

R0376

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

May 7, 1999

STID 3423

Mr. Scott Hooton
BP Oil Company
Environmental Remediation Management
295 SW 41st Street
Renton, WA 98055-4931

RE: BP Oil Site #11105, 3519 Castro Valley Boulevard, Castro Valley

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Hooton:

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

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

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

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

1) consider a cleanup proposal (corrective action plan)

2) consider a site closure proposal

3) make a determination that no further action is required

4) issue a closure letter

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

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

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB

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

RAFAT A. SHAHID, Assistant Agency Director

R0346

STID 3423

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

August 10, 1994

Mr. Scott Hooton
BP Oil Company
Environmental Resource Management
Building 13, Suite N
295 SW 41st Street
Renton, WA 98055-4951

RE: (FORMER) BP OIL COMPANY STATION #11105, 3519 CASTRO VALLEY BLVD., CASTRO VALLEY

Dear Mr. Hooton:

As we have discussed, I am in receipt of the June 3, 1994 Alisto Engineering Group (AEG) work plan for the supplemental investigation at the referenced site. The cited AEG work plan, initially received via facsimile on June 4, 1994, was formally submitted under AEG cover dated June 6, 1994. This work plan was presumably submitted in response to an April 18, 1994 request from this office for a soil and water investigation (SWI) work plan, pursuant to provisions of Article 11, Title 23, California Code of Regulations.

The June 4, 1994 AEG work plan has been accepted as submitted for this initial phase of the SWI at this site. As we discussed during our on-site meeting the afternoon of August 3, 1994, additional SWI phases will likely be required in the future at this site.

Please call me at 510/567-6700 when field work is slated to begin.

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
Pam Evans, ACDEH
Brady Nagle, Alisto Engineering Group
Ted Simas, Xtra Oil Company

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

R0346

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 3423

June 13, 1994

Mr. Scott Hooten
BP Oil Company
Environmental Resource Management
Building 13, Suite N
295 SW 41st Street
Renton, WA 98055-4951

RE: BP OIL COMPANY STATION #11105, 3519 CASTRO VALLEY BLVD., CASTRO VALLEY

Dear Mr. Hooten:

I am in receipt of your June 2, 1994 correspondence submitted in response to the April 18, 1994 notice from this office in which was requested a work plan for the further assessment of the referenced site. For your information, we are also in receipt of a June 3, 1994 Alisto Engineering Group work plan, sent via facsimile on June 4, 1994. Since receipt of your June 2 letter, I have again reviewed the case file for your site, in addition to consulting with other qualified engineers and geologists regarding the results of the investigation to date. Following are comments to the arguments expressed in your June 2 letter. A response to the noted Alisto work plan will be addressed under separate cover.

It would appear from both the reading of your letter and our recent June 1, 1994 telephone conversation that BP is most troubled by the fact that this department has not acknowledged your conclusion that the referenced BP site has been impacted by the migration of hydrocarbons from the nearby Xtra Oil station. Although it is true that we *suspect* that the release at the Xtra Oil site *may* have contributed to the pollution identified at the BP site, it is additionally true, however, that we are <u>not</u> presently convinced that the release at the Xtra Oil site is the sole source of the pollution at the BP site. Whether BP agrees or not, the data suggest the probability that an on-site source is present at the BP site. For this reason BP has been directed to conduct a further assessment of these possible source areas, and to extend the current investigation downgradient of the site to track the limits of the hydrocarbon plume.

You further suggest that, because your consultant's November 23, 1992 report, prepared by a California-registered geologist, did not state that an on-site source of hydrocarbons -whether

probable or otherwise- exists, or that the ground water is under confined or semi-confined conditions, the county should not as well. You are correct when you say that the consultant's report did not discuss these issues. The consultant's report also did not identify that an apparent abandoned dispenser island (read: a potential source area) is located along the western edge of the site, adjacent to Redwood Road. Nor did the consultant expound at all regarding the fact that ground water rose *significantly* (reportedly more than 13 feet in ESE-3) from the depth at which it was initially encountered in the advancing boreholes, compared to where ground water stabilized in the completed wells. Nor did the consultant's report present any discussion regarding the significance of the reported differences in hydrocarbon concentrations in soil encountered from one borehole to another and the depths at which contaminants were found, the differences in hydrocarbon concentrations in ground water encountered from one well to another, nor how such concentration differentials relate to potential source areas and expected rates of contaminant attenuation and retardation in the subsurface as such migrate from the source area(s), whether on- or off-site.

We can only assume that, in the absence of such discussions in the consultant's report, these issues and data must not have been considered, or that the consultant felt more information and evaluation was needed before *firm* conclusions could be rendered. BP, however, appears to have reached several conclusions in the presence of a data set which is presently incomplete. Incidently, your consultant's preliminary conclusion with respect to the off-site source issue is simply that a possible source of the contamination noted in ESE-5 is the Xtra Oil site.

Some issues which we have considered are:

- Potential on-site source areas have not been fully investigated or ruled out as contributors to the ground water and soil contamination discovered at the BP site. Concentrations of hydrocarbons in soil encountered at 10.5 feet below grade (BG) in borehole ESE-3, east and "down-gradient" of the active dispenser islands, are an order-of-magnitude higher than any other soil samples collected elsewhere at the site at comparable depths (e.g., ESE-4 @ 10 BG, located approx. 50 feet "upgradient" of ESE-3). Would this be expected if an off-site source is suspected?

- Concentrations of specific aromatic compounds in soil encountered at 10 feet BG in ESE-5 are an order-of-

magnitude *lower* than in soil encountered in ESE-1 at 15 feet BG, even though both have comparable (51 vs. 70 ppm, respectively) TPH concentrations. Would this be expected when ESE-5 is approximately 80 feet closer to the suspected off-site source? What roles, then, have advection vs. diffusion vs. adsorption vs. bioattenuation played in this contaminant distribution? Further, if ground water is confined, as BP suggests, why would soil sampled from a depth of 15 feet BG in ESE-1 be "hot," when, according to BP's theory, this sample was collected approximately 4 feet below the "water table?"

- Examination of boring logs suggest that ground water is present under confined or semi-confined conditions. In each well, water was encountered at some depth greater than where it stabilized following well completion. Water was initially encountered at a depth BG of between 15 and 24 feet, yet rose between approximately 5 and 13.5 feet when stabilized. The boring logs for each well describe the moisture content of encountered sediments as "damp" from the point of the first lithologic description of native sediments until the point of saturation, where the term "wet" is used. The exception to this description of moisture content is with boring ESE-1 where the term "damp" is the descriptor used from grade to an approximate depth of 20 feet BG, at which point encountered sediments are described as "moist." At approximately 22 feet BG sediments are described as "wet," although the log indicates ground water was first encountered at 20 feet BG. What significance do the apparent coarsening of sediments with depth, and the contact between overlying finer-grained sediments with a deeper silty sand horizon (e.g., ESE-1, -2, -3, -4) play in initial and stabilized ground water levels?

BP has argued that the point of saturation in fine grained sediments is difficult to determine in the field, particularly when attempting to discern a "very moist" from a "saturated" sediment. This is correct. However, the logs do not suggest that the geologist logging the boreholes was attempting to discern between a very moist and saturated condition. Instead, encountered sediments, as stated previously, were described as damp, essentially from the surface downward until saturation was observed, except for the one minor exception noted. To miss a saturated zone by a few feet or so is common in fine grained sediments; however, to miss identifying the saturated zone by upwards of 14 feet is not.

As we discussed June 1, ground water encountered under such apparent confined or semi-confined conditions is a common occurrence in Castro Valley. For your information, Castro Valley is an isolated, structural basin surrounded to the west, north and east by folded and faulted uplands comprised of Cretaceous sandstone, shale and conglomerate of marine origin. The valley is bounded to the west by active traces of the Hayward fault. The major drainage through Castro Valley is San Lorenzo Creek, located approximately 3/4 mile east of the site and which essentially flows from north to south through the valley. At the southern extent of the valley, San Lorenzo Creek flows towards the southwest, passing over the Hayward fault zone, continues briefly in a northwesterly direction parallel to the fault, and then west towards San Francisco Bay. Other north-south drainages in Castro Valley feed into the San Lorenzo, including one such culvertized drainage within a short distance east from the subject site. Sediments collecting in the valley are mostly of fluvial origin.

Please note on the enclosed portion of the Hayward 7.5' quadrangle that Castro Valley is not flat. Elevation increases as one traverses the valley from south to north, the topography steepening quickly near the valley's northern terminus, as well as along the western and eastern margins. The uplands north, west and east of the valley likely represent areas of ground water recharge from rain infiltration to aquifer(s) present in the relatively thin (<100 feet thick) sediments comprising the valley fill. Landscape irrigation also may play a significant role in recharge. Given the overall structure and topography of the basin in which Castro Valley is located, the heterogeneity of the sediments (i.e., sands, silts and clays), and the depth at which ground water is initially encountered vs. where it eventually stabilizes, it is not unreasonable to deduce from the evidence presented thus far, at this and other environmental investigations in proximity to the BP site, that ground water is present under confined or semi-confined conditions.

You suggest that only through the performance of a pumping-test can it be determined whether an aquifer is under confined or semi-confined conditions. Academically this may be correct in the absence of any other information, and in the ideal environment. However, there is a scientific limitation to the interpretation of pumping-test time-drawdown response curves which relates to the nonuniqueness of such interpretation. Similarity in time-drawdown response can arise from leaky, unconfined, and bounded systems. The mere fact that a

theoretical curve can be matched to pumping-test data does not prove that the aquifer confirms the assumptions on which the curve is based. I would suggest that if BP feels as strongly as I suspect they do regarding this issue, however, a pumping-test be performed and the data evaluated.

Your June 2 letter also comments on my reliance on odors recorded by the geologist logging the boreholes as an indicator of contamination. Please note that odors were *not* the most significant indicator with which I based a determination for a potential on-site source. Neither, however, should odors be considered an insignificant indicator.

A person's nose is a very sensitive "instrument." We use the presence or absence of odors every day to make decisions. You are correct in noting that sensitivities vary from person to person. You are also correct in noting that olfactory fatigue does occur, usually upon repeated or chronic exposure to elevated concentrations of particular chemicals, gasoline among them. There are exceptions. Typically an individual's ability to detect similar concentrations upon prolonged exposure to a given compound becomes suppressed. On a typical drilling site, however, it is the exception rather than the rule that vapor concentrations reach a level where olfactory fatigue may present itself. Hence, odors, in addition to field instrument deflection, staining, and laboratory analyses, are all useful in evaluating the presence of contaminants. Although we are not endorsing the use of one's nose to assess the presence of contaminants at a site, the incidental detection of the relative strengths of odors during drilling can not, and *should not*, be overlooked.

Our receipt in February 1993 of the November 23, 1992 ESE report was our first notification of the apparent release and investigation at this site, a release discovered during September and October 1992. Our request for a specific sampling, monitoring and reporting schedule was memorialized in the March 18, 1993 correspondence from this office. With respect to our request for monthly ground water elevation monitoring for 12 consecutive months to which BP has taken exception, this schedule is the same requested of most underground storage tank investigations in order to get a solid grasp of site-specific flow characteristics to assist all parties in developing viable strategies to expand investigations as projects evolve. BP has apparently chosen not to implement this request, arguing, now more than a year after this schedule was requested, that it is both unnecessary and unwarranted.

Success of this and any other investigation requires cooperation between the responsible party(ies), consultants, and local agency. We have requested of BP information that will assist *all* involved parties to make informed, logical, and appropriate decisions. This request was not made arbitrarily nor in a vacuum. Our experience in Castro Valley, as well as elsewhere within our jurisdiction, has shown that ground water flow directions often change periodically on a given site for a variety of causes, some understood and others not. Quarterly monitoring does not often provide the degree of frequency necessary to identify these fluctuations, but a monthly schedule often does. An understanding of such fluctuations is often necessary to fully evaluate the advective process, and, hence, the distribution of contaminants about and away from a given site. It is unfortunate that BP apparently does not appreciate the merit of these additional data.

As we discussed June 1, analyses for the presence of additional, specific waste oil constituents have been reduced to only that ground water collected from wells ESE-1 and -2, as you confirm in your June 2 letter. As you further indicate, an evaluation of these data will dictate the need for future waste constituent analyses.

Lastly, as we discussed last week, it appears that surveyed well casing elevations at the BP site are significantly different from those located at the Xtra Oil site. The consequence of this problem is that, even if wells are monitored on the same day at each site, the data cannot be evaluated to the extent that a flow map of the area may be constructed using the data from both sites. Please coordinate with Xtra Oil to correct this problem. Xtra Oil, with whom I have also discussed this issue, are being informed of this official request by way of copy of this letter.

Please contact me at 510/271-4530 should you have questions.

Sincerely,

Scott O. Seery, CHMM
Senior Hazardous materials Specialist
attachment

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Kevin Graves, RWQCB
Ted Simas, Xtra Oil

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

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

R0346

STID 3423

April 18, 1994

Mr. Scott Hooten
BP Oil Company
Environmental Resource Management
Building 13, Suite N
295 SW 41st Street
Renton, WA 98055-4931

RE: BP OIL COMPANY STATION #11105, 3519 CASTRO VALLEY BLVD., CASTRO VALLEY

Dear Mr. Hooten:

Your attention is directed to the March 18, 1993 correspondence from this office which outlines expected sampling, monitoring and reporting frequencies, as well as target analytes for each well, for the environmental investigation at the referenced site. A copy of this letter is attached for your reference.

Please note that the cited March 18, 1993 letter directs BP Oil Company to measure ground water elevations **monthly** for the first 12 consecutive months, followed by a quarterly schedule thereafter. BP Oil Company was further directed to, in addition to gasoline compounds, analyze samples collected from wells "MW-1" through "MW-3" (ESE-1 through ESE-3) for the specific waste oil target compounds TPH-diesel (TPH-D), halogenated volatile organic compounds (HVOC), and semi-volatile organic compounds (SVOC). To date, this office has not received any data supporting BP Oil Company's compliance with these monitoring and analyses directives.

From this time forth, ground water sampled from wells ESE-1, -2, and -3 shall be analyzed for TPH-G, TPH-D, BTEX, HVOC, and SVOC until further notice.

Data presented in the November 23, 1992 Environmental Science & Engineering, Inc. (ESE) *Preliminary Site Assessment Report* indicates a probable on-site source of hydrocarbons discovered in soil and ground water encountered at this site. Specifically, heavy hydrocarbon (HC) odors were noted during the drilling of ESE-1, -2, and -3 beginning at shallow depth (<11 feet below grade [BG]). HC odors were also encountered in ESE-4 at approximately 6.5' BG; "slight" HC odors were detected in ESE-5 between 3 and 10' BG.

Elevated concentrations of fuel HC compounds were identified during laboratory analyses of shallow soil samples collected from each boring. TPH-G concentrations ranged from 24 parts per million (ppm) in ESE-4 at 10′ BG, up to 220 ppm TPH-G in ESE-3 at 10.5" BG. Further, soil sampled from ESE-5 at 10′ BG exhibited 51 ppm TPH-G, also at 10′ BG. Ground water was initially encountered in each boring at approximately 15-29′ BG, and is under confined to semi-confined conditions.

As was communicated in the cited March 18, 1993 correspondence, pursuant to provisions of Article 11, Title 23, California Code of Regulations, a Soil and Water Investigation (SWI) and Corrective Action Plan (CAP) are to be developed for this site.

A SWI is required at this time. The SWI must be designed to define the extent of the soil and ground water pollution associated with this site. 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 some number of these borings and wells may need to encroach upon adjoining properties, whether private or public.

A SWI work plan must be submitted for review. **This work plan is due within 45 days of the date of this letter, or by the close of business on June 3, 1994.** Work should commence no later than 30 days following work plan approval. A report must be submitted within 45 days of the completion of field activities associated with this phase of work at the site.

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

- Details and results of <u>all</u> work performed during this phase of the investigation: 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.

- Status of ground water contamination and characterization

- Professional interpretation of results: water level contour maps showing gradients, free/dissolved plume definition maps for each target compound, cross sections, etc.

- 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 a CAP is required to be developed and proposed following the completion of the SWI phase of work at this site.

Please be further 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 appropriate authority for enforcement action.

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

Sincerely,

Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

attachment

cc: Rafat A. Shahid, Assistant Agency Director, Env. Health
Gil Jensen, Alameda County District Attorney's Office
Ed Laudani, Alameda County Fire Department
Britt Johnson, ACDEH

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

R0346

April 23, 1993

Mr. Chester Bennett
B P Oil Facility #11105
3519 Castro Valley Blvd.
Castro Valley CA 94546

Re: Five Year Underground Storage Tank Permit
3519 Castro Valley Blvd., Castro Valley

Dear Mr. Bennett:

This letter is in regard to the inspection made previously at the above facility. This inspection was performed with regard to five year underground tank permit. Enclosed please find a five year permit to operate your tank(s). However, please be advised that Title 23, California Code of Regulations (CCR) requires the following:

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 years. These records must be made available upon request, within 36 hours, to a representative of this office.

Consult Title 23, CCR for additional requirements. To obtain a copy of the regulations, you can contact the State Water Resources Control Board at (916)-739-4436.

If you have any questions, please contact me at (510)-271-4320.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

cc: files

USTPERMT

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

R0346

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 3423

March 29, 1993

Ms. Pauline Reith
BP Oil Company
16400 Southcenter Parkway, #301
Tukwila, WA 98188

RE: BP OIL COMPANY STATION #11105, 3519 CASTRO VALLEY BLVD., CASTRO VALLEY, ALAMEDA COUNTY, CALIFORNIA

Dear Ms. Reith:

This letter follows my receipt of your letter dated March 25, 1993. My reading of your letter made me realize that there may be areas of the California underground storage tank regulations, as codified under Chapter 16 of Title 23, California Code of Regulations (CCR), of which you may not be aware. I think that, once these areas are more fully explained, you may not feel that my request for an Unauthorized Release Report (ULR) within 5 working days is such an unreasonable one.

Section 2652(b) of 23CCR requires that an unauthorized release be reported to the local agency **within 24 hours** of the release being detected, or should have been detected. Section 2652(c) requires, **within 5 working days of detecting a release**, that a full written report be submitted to the local agency. The cited ULR is considered such a report.

Realizing the release at the subject site was detected, according to the ULR issued March 25, 1993, on September 28, 1992, approximately 6 months passed before a ULR was received by this office. Further, notification of the detected release was not received in <u>any</u> fashion until our receipt of the November 23, 1993 Environmental Science and Engineering (ESE) assessment report, submitted under ESE cover dated February 9, 1993.

You mentioned during our March 24, 1993 phone conversation, and again briefly in your March 25 letter, that a copy of the referenced ESE report <u>and</u> a ULR were mailed to this office under BP cover dated January 26, 1993. As we discussed March 24, these documents were apparently incorrectly addressed and, hence, never received. However, even if these documents had been received when originally sent, BP Oil was still in violation of the release reporting requirements of 23CCR by failure to report the detected release in the timely fashion required under California law.

Please call me at 510/271-4320 should you have any additional 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
Rich Hiett, RWQCB
Jim Ferdinand, Alameda County Fire District
Brian Oliva, ACDEH
Ed Howell - files

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

R0346

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 3423

March 18, 1993

Ms. Pauline Reith
BP Oil Company
16400 Southcenter Parkway, #301
Tukwila, WA 98188

RE: BP OIL COMPANY STATION #11105, 3519 CASTRO VALLEY BLVD., CASTRO VALLEY, ALAMEDA COUNTY, CALIFORNIA

Dear Ms. Reith:

The Department is in receipt and has completed review of the November 23, 1992 Environmental Science & Engineering, Inc. (ESE) Preliminary Site Assessment Report, as submitted under ESE cover dated February 9, 1993. I understand from a conversation with ESE's Michael Quillin that the work documented in the noted report was initiated not by previous evidence of an unauthorized release, but rather by BP's potential divestiture of this site.

As you are likely aware, the San Francisco Bay Regional Water Quality Control Board (RWQCB) requires further environmental investigations to be performed when unauthorized releases are discovered. The recently-completed preliminary site assessment (PSA) clearly establishes that such an unauthorized release has occurred. As a result, several tasks must now be completed, and certain monitoring, sampling, and reporting schedules met, as will be discussed in this letter.

The State of California requires that an **Unauthorized Release (Leak) / Contamination Site Report** (ULR) be completed anytime an unauthorized release is identified. Please complete and return the attached ULR to this office within 5 working days, or by March 26, 1993.

At this time, you are requested to adhere to the following sampling, monitoring, and reporting schedule:

1) Ground water elevation monitoring shall be conducted **monthly** for the next 12 consecutive months, beginning April 1993, until site-specific flow direction and gradient have been established. Following the collection of 12 months of elevation data, this monitoring frequency shall be reduced to a quarterly schedule. Gradient maps shall be created for each event.

2) Well sampling shall be conducted **quarterly** until further notice. Ground water collected from **all** wells shall be analyzed for TPH-gasoline and BTEX. Additionally, ground water collected from MW-1, -2 and -3 shall also be analyzed for waste oil constituents: TPH-diesel, halogenated and semi-volatile organic compounds (HVOC and SVOC, respectively), and total oil and grease (TOG). These analyses shall follow established EPA, RWQCB and/or DHS/LUFT approved methodologies, as appropriate.

3) Reports shall be submitted **quarterly** until this site qualifies for site closure. Such reports shall describe the status of the investigation and include, among others, the following elements:

   - o Details and results of all work performed during the 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 reports), tabulation of free product thicknesses and dissolved fractions, etc.
   - o Status of ground water contamination characterization
   - o Interpretation of results: water level contour maps showing flow direction/gradient, free and dissolved product plume definition maps for each target compound, geologic cross sections, etc.
   - o Recommendations for additional work

In accordance with Section 2724 of Article 11, Title 23, California Code of Regulations (CCR), a **Soil and Water Investigation** (SWI) shall be conducted to further define the extent of an unauthorized release. Further, pursuant to Section 2725(c) of Article 11, a **Corrective Action Plan** (CAP) must be developed once the extent of the problem has been characterized. In development of a CAP, the plan must address, among other elements, the following:

- o assessment of the impacts
- o feasibility study
- o applicable cleanup levels

- proposed schedule for implementation of the proposed actions

Your attention is directed to Article 11 of 23CCR for the specific requirements of the cited sections. At this time, BP Oil Company should begin preparing to conduct a SWI and develop a CAP for this site. Both the SWI and CAP will require the submittal of appropriate work plans/proposals to this office for review and approval before each may be initiated. Each phase must be conducted and developed in accordance with the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, the State Water Resources Control Board Leaking Underground Fuel Tank (LUFT) Field Manual, and Article 11 of 23CCR. All reports and proposals must be submitted under seal of a California-registered geologist or civil engineer with the appropriate environmental background.

This office will notify you when the SWI work plan should be submitted for review. Please feel free to call me at 510/271-4320 should you have any questions.

Sincerely,

Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

attachment

cc: Rafat A. Shahid, Assistant Agency Director, Env. Health
Gil Jensen, Alameda County District Attorney's Office
Rich Hiett, RWQCB
Jim Ferdinand, Alameda County Fire District
Michael Quillin, ESE
Ed Howell - files

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

R0346

October 20, 1992

Mr. Mirazim Shakoori
B.P. Gas Station # 11105
3519 Castro Valley Blvd
Castro Valley, CA 94546

Re: Five-year Permit to operate and Underground Storage Tank(UST) Regulations, B.P. Gas Station # 11105, 3519 Castro Valley Blvd, Castro Valley, CA 94546

Dear Mr. Shakoori:

This letter is in regard to the inspection made on October 16, 1992, at the above facility. This inspection was performed in order to bring your facility into compliance, inform you of new requirements of UST regulations, and issue a five year Permit to operate your underground storage tanks. **Please submit the following items:**

1- A statement indicating that all your inventory Reconciliation variations for the last year and this year up to now were within the "allowable variations" (see item 3 next page for further explanation of the allowable variations)

2- Copies of all tanks and piping tightness test results for this and the last year .

Furthermore, please be advised that Title 23 of the California Code of Regulations (CCR) requires compliance for the following items:

1) **As of January 1, 1993, manual stick readings can not be used as an inventory reconciliation method for UST containing hazardous materials if the distance from the bottom of the tank to ground water is less than 20 feet** [see section 2646(b)]. In which case, you must either seek an alternative method of stick reading, such as automatic level sensing, or use Statistical Inventory Reconciliation (SIR). A Level Sensor is an in-tank device which automatically measures fuel inventory in your tank. The SIR method involves the use of statistical software to conduct computerized analysis of the data you collect from your stick readings. Statistical Inventory Reconciliation is performed by independent third-party companies.The names of companies which perform SIR can be obtained from this office.

However, if the distance from the bottom of your tank(s) to ground water is more than 20 feet, you can still use stick readings for inventory reconciliation until December 22, 1998.

2) As of January 1, 1992, you are required to submit inventory reconciliation data on an **annual** basis. [see section 2646(j)] (requirements for submission of quarterly summaries were dropped).

3) The owner or operator of the UST shall notify this office and the State Water Resources Board within 24 hours **if monthly variation of inventory reconciliation exceeds the legally allowed variation (1% of monthly deliveries + 130 gallons). Furthermore, the following must be completed to investigate the cause of excessive monthly variation:**

- the inventory reconciliation calculations must be checked for any arithmetic errors within 24 hours
- a trained individual must inspect the readily accessible underground tank systems for any leakage within 24 hours.
- the dispensing meters must be checked for proper calibration
- if completion of any of these steps indicates that the monthly variation of inventory reconciliation is still within the legal limit or apparent excessive variation is not due to a release or tank failure, then the remainder of the steps need not be completed.
- continue to conduct daily inventory reconciliation.
- If the next month's variation in inventory reconciliation also exceeds the legally allowed variation, then it is assumed that an unauthorized release has occurred. In that case, additional investigation and tests, such as tank and piping tightness tests, may be required [see section 2646(j)&(k)].

4) **The owner or operator of underground fuel tank(s) must prevent spilling or overfilling during fuel delivery.** Before receiving fuel, measure tank(s)volumes using a fuel measuring stick or automatic tank level sensor (described in item 1 above) to ensure that tank(s) has more available space than volume of product, which is to be transferred into the tank(s). Furthermore, fuel delivery operation must be constantly monitored. [see section 2663(b)]

5) Written records of all monitoring and maintenance performed shall be kept for a period of at least three years. These records must be made available upon request, no later than 36 hours, to a representative of this office [see section 2712(b)].

6) **As of December 22, 1990, all underground pressurized piping had to be equipped with automatic line leak detectors.** If your pressurized piping is not equipped with such device, contact this office for installation of "approved leak detectors".[see section 2664 (c)]

7) The owner or operator of underground fuel tank(s) shall **by December 22, 1998, retrofit all underground tanks and pipings with secondary containments or provide both interior lining and exterior cathodic protection.** Cathodic protection is required only if your tank or piping is made of steel [see section 2662, 2664].

8) **The owner or operator of all underground fuel tanks shall provide Spill and overfill prevention equipment by December 22, 1998.**[see section 2663]

Contact this office Prior to any repair or upgrade of your underground tank or piping. Consult Title 23, CCR for additional requirements. To obtain a copy of these regulations, contact the State Water Resources Control Board at (916)-739-4436.

If you have any questions in regard to new requirements and or items requested, please contact me at (510)-271-4320.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

CC: files

USTREGOLD

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

April 22, 1992

Chester Bennett
Tait & Associates
2880 Sunrise Blvd., Suite 206
Rancho Cordova, CA 95742

Subject: BP Oil Co. Sites in Alameda County

Dear Mr. Bennett:

Enclosed you will find copies of the Alameda County, Department of Environmental Health, "Inspection Form" for the following sites:

(RO511) 1) BP Oil #11270, 3255 MecCartney , Alameda, CA
(RO560) 2) BP Oil #11128, 4707 First Street, Livermore, CA
(RO403) 3) BP Oil #11133, 2220 98th Ave., Oakland, CA
(RO346) 4) BP Oil #11105, 3519 Castro Valley Blvd, Castro Valley, CA

Please feel free to contact this office if you have any questions concerning the above sites or any other BP Oil facilities under the authority of the Alameda County Division of Hazardous Materials. The telephone number is (510) 271-4320

Sincerely,

Brian P. Oliva

Brian P. Oliva, REHS
Hazardous Materials Specialist

cc: Mark Thomson, Alameda County DA's Office
Pete DeSantis, BP Oil Co.

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

R0946

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

December 20, 1991

Mr. Al Martig
BP Oil Company
Aetna Building, Suite 360
2868 Prospect Park Drive
Rancho Cordova, CA 95670-6020

RE: BP OIL STATION #11105, 3519 CASTRO VALLEY BOULEVARD, CASTRO VALLEY, ALAMEDA COUNTY

Dear Mr. Martig:

Thank you for taking the time to speak with me today regarding the compliance status of the referenced BP Oil facility. As we discussed, this Division is convinced that few service station operators, such as Mr. Shakoori, can operate in full compliance with California's complex and ever changing laws without outside assistance and training. In our experience, such assistance and training is most effectively provided by personnel of the parent corporation well versed in the laws and regulations which govern this industry, and who are dedicated to this task.

Enclosed please find copies of the June 26, 1991 Notice of Violation (NOV) sent to Mr. Shakoori, the October 30, 1991 Second Notice of Violation, a cover letter of that same date addressed to your colleague, Mr. DeSantis, and Mr. Shakoori's response to the second NOV. Please note that the copy of the original NOV provided contains Mr. Shakoori's responses in the form of comments in the letter margins. Please also note that his response to the second NOV contains little information relevant to the cited violations.

As we further discussed, the Division still awaits the submittal of a Plan of Correction addressing the noted violations. Please call me at 510/271-4320 should you have any questions.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

enclosures

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, DTSC
Bob Bohman, Castro Valley Fire Department

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

R0346

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

October 30, 1991

Mr. Peter DeSantis
BP Oil Company
Aetna Building, Suite 360
2868 Prospect Park Drive
Rancho Cordova, CA 95670-6020

RE: BP OIL STATION #11105, 3519 CASTRO VALLEY BOULEVARD, CASTRO VALLEY, ALAMEDA COUNTY

Dear Mr. DeSantis:

Enclosed please find a copy of the Second Notice of Violation, dated October 30, 1991, sent under certified mailer to the referenced facility operator, Mr. Mirazin Shakoori. Mr. Shakoori was issued the initial Notice of Violation (NOV) on June 26, 1991. A Plan of Correction was requested to outline appropriate actions to be taken to address each of the many violations. Instead, Mr. Shakoori sent back the original June 26 NOV, upon which he wrote brief statements adjacent to four of the five sections of the NOV which described observations made by this inspector during the May 29, 1991 inspection. A copy of Mr. Shakoori's response is also enclosed.

Mr. Shakoori's submittal does not constitute a Plan of Correction; the Second Notice of Violation addresses this point. However, Mr. Shakoori's submittal has, nonetheless, been reviewed by the Department. Please note that Mr. Shakoori, in his comment adjacent to item 1, alludes to the presence of improperly stored and/or labelled drum(s) which he feels are not his responsibility. Further, no comments are found adjacent to item 4, that observation describing the lack of any employee training.

The Department recognizes that BP Oil has a responsibility to keep their dealers properly trained and informed of the laws and regulations which effect their businesses. As environmental laws are complex and in a constant state of flux, without the guidance and training provided by the corporate environmental compliance specialists, it has been our experience that it is only the rare retail fuel station operator who can manage to operate his or her station in full compliance.

The Department expects that BP Oil will assist Mr. Shakoori in addressing the violations noted during the May 29 inspection, as outlined in the original June 26 NOV. Further, should the BP Oil corporation be responsible for some of the violations noted during the May 29 inspection, the corporation is expected to rectify them, and prevent their reoccurrence.

Please call me at 510/271-4320 should you have any questions.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

enclosures

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
Bob Bohman, Castro Valley Fire Department
Mirazin Shakoori, BP Station #11105
files

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

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

Certified Mailer # P 367 604 332

October 30, 1991

Mr. Mirasin Shakoori
Castro Valley BP Station #11105
3519 Castro Valley Boulevard
Castro Valley, CA 94546

RE: BP STATION #11105, 3519 CASTRO VALLEY BOULEVARD, CASTRO VALLEY, ALAMEDA COUNTY

SECOND NOTICE OF VIOLATION

Dear Mr. Shakoori:

This Second Notice of Violation is in response to your failure to submit a Plan of Correction as required by this Department for violations of Chapters 6.5, 6.7 and 6.95 of the State Health and Safety Code (HSC), and Titles 22 and 23 of the California Code of Regulations (CCR), noted during an inspection of this facility on May 29, 1991. Enclosed is a copy of the original Notice of Violation sent under Certified Mailer # P 367 604 431 dated June 26, 1991 in which your Plan of Correction was first requested.

At this time, you are directed to respond to this Notice within 15 days, or by November 14, 1991, by the submittal of a Plan of Correction which incorporates all the elements outlined in the original violation letter.

Your attention is again directed to Sections 25299 and 25540 of the HSC which authorize civil penalties of up to $25,000 per day per violation, and jail sentences of up to one year. Please be advised that the Alameda County District Attorney's Office is being notified of the these facts by way of copy of this letter.

Further, please be advised that the State Water Resources Control Board recently issued an updated version of Title 23, CCR. The current Title 23 has changed significantly from the past version, particularly with regards to those sections outlining appropriate methods for monitoring single wall underground storage tanks and reporting. The new Title 23 became effective on or around August 1, 1991. It is your responsibility to immediately implement any changes mandated by these regulations.

Please contact me at 510/271-4320 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
Peter DeSantis, BP Oil
Bob Bohman, Castro Valley Fire Department
files

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

R0346

Certified Mailer # P 367 604 431

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

June 26, 1991

Mr. Mirazin Shakoori
Castro Valley BP Station #11105
3519 Castro Valley Boulevard
Castro Valley, CA 94546

NOTICE OF VIOLATION

Dear Mr. Shakoori:

On May 29, 1991, your facility was inspected by the Alameda County Department of Environmental Health, Hazardous Materials Division, for compliance with Chapters 6.5, 6.7, and 6.95 of the state Health and Safety Code (HSC), and Title 22 and 23 of the California Code of Regulations (CCR).

During the May 29 inspection, the following observations were made:

1) Waste oil is routed directly to an underground storage tank (UST) via a remote fill within the service bay. However, 5 x 55-gallon drums of apparent hazardous waste are stored outside and to the east of the service area, along the southeast perimeter of the property. Only one drum is appropriately labelled with a "Hazardous Waste" label, and shows an initial accumulation date of March 3, 1991; the contents are identified as gasoline/water waste, reportedly pumped from the USTs. Two (2) other drums appear (by odor) to contain gasoline (and other?) wastes. Two (2) others appear to have a mixture of waste oil/brake fluid/ antifreeze. None of these four drums are labelled appropriately as hazardous waste. None are stored in a secured area.

2) No EPA waste generator identification number was available for review.

3) Hazardous waste disposal receipts/records were not available for review.

4) Training in hazardous waste compliance issues and procedures (e.g., waste handling, drum labelling, storage time limits, etc.) has not been implemented.

5) Tank monitoring and product reconciliation does not appear to follow Title 23 monitoring requirements. No quarterly reconciliation summary reports have been submitted to this Department, nor were any retained on file. Copies of tank tests, or other monitoring, reports were not available for review.

As a result of the observations noted above, several violations of state law and regulations were identified. Following is a list of the violations of Titles 22 and 23, CCR, and Chapter 6.7, HSC which were noted during the May 29 inspection:

Section 66305, 22CCR - A producer of a waste which falls within the scope of Section 66300 (22CCR), must determine whether it is a hazardous waste pursuant to any criterion of Article 11 (22CCR) or Section 25117 of the HSC.

Section 66371, 22CCR - Hazardous waste facility permits are required by hazardous waste generators that accumulate hazardous wastes on site for more than 90 days.

Section 66471, 22CCR - A person who generates a waste, as defined in HSC Sections 25122 and 25122.5., shall determine if said waste is hazardous waste according to any criterion of subsections (a) or (b) of this section.

Section 66472, 22CCR - Any generator of a hazardous waste shall apply for and receive an EPA identification number. A generator may not treat, store or dispose of, transport or offer for transport any hazardous waste without an EPA identification number.

Section 66492, 22CCR - The generator of a hazardous waste shall retain records documenting waste disposal and any laboratory results used to characterize a waste for period of 3 years.

Section 66505, 22CCR - A generator of hazardous waste may accumulate hazardous waste on site for 90 days or less without needing a permit (as a TSD) or interim status provided that:

(1) the waste is placed in containers and the generator complies with Article 24 (22CCR) as it pertains to interim status facilities, or the waste is placed in tanks and the generator complies with Article 25 (22CCR) as it applies to interim status facilities except for Sec. 67258;

(2) the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;

(3) while being accumulated on site, each container is clearly marked with the words, "Hazardous Waste;

(4) the generator complies with the requirements for owners or operators in Articles 19 (Preparedness and Prevention for Interim Status and Permitted Facilities) and 20 (Contingency Plan and Emergency Procedures for Interim Status and Permitted Facilities) and Section 67105 (Personnel Training).

A generator who stores hazardous wastes for more than 90 days is an operator of a storage facility and is subject to the requirements of Articles 17 through 32 (22CCR) and the permit requirements of Article 6.

A label shall be placed on all nonstationary containers (e.g., drums) in which hazardous wastes are stored, and shall include the following information (in addition to that noted previously):

(1) composition and physical state of the waste;

(2) statement or statements which call attention to the particular hazardous properties of the waste (e.g., reactive, toxic, flammable, corrosive, etc.);

(3) the name and address of the person producing the waste.

Section 67105, 22CCR - Facility personnel shall be successfully trained to perform their duties in a way that ensures compliance with this chapter. Annual refreshers are required. Training record are to be kept on file.

Section 2641(c), 23CCR - All owners of existing USTs who cannot implement visual monitoring for the entire UST during all periods of the year shall implement one of the monitoring alternatives specified in Subsection (c) of this section.

Section 2644(e), 23CCR - The owner/operator shall submit, **on a quarterly basis**, a statement to the local agency, under penalty of perjury, that either: the (reconciliation) data is within allowable variations, or, listing the dates and variations that exceed the allowable variations.

Section 2712(c), 23CCR - Written records of all monitoring performed shall be maintained on-site by the operator for a period of 3 years from the date the monitoring was performed. The written monitoring records shall be shown to the local agency upon demand during any site inspection.

Section 25293, HSC - The owner/operator of the underground storage facility shall monitor the facility using the method specified in the permit for the facility. Records are to be kept in sufficient detail to enable the local agency to determine that the operator has undertaken all the monitoring activities required by the permit.

To resolve the violations noted above, a **Plan of Correction** must be submitted to this Department within 30 days of the date of this letter, **or by July 26, 1991.** This Plan should specify the actions to be taken to address each of the violations, and a time schedule for implementation of each action cited.

Your attention is directed to Sections 25189, 25189.5, and 25299 of the HSC which authorize civil penalties of up to $25,000 per day per violation, and jail sentences of up to one year.

Please contact 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
Lester Feldman, RWQCB
Howard Hatayama, DHS
Bob Bohman, Castro Valley Fire Department
Peter DeSantis, BP Oil Company
files

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

R0346

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

Certified Mailer #P 062 127 747

December 18, 1990

Mr. Peter DeSantis
BP Oil Company
Aetna Building, Suite 360
2868 Prospect Park Drive
Rancho Cordova, CA 95670-6020

RE: BP OIL FACILITY #11105, 3519 CASTRO VALLEY BLVD., CASTRO VALLEY, ALAMEDA COUNTY

Dear Mr. DeSantis:

This letter follows in the wake of and shall serve to summarize our telephone conversation December 14, 1990. During this conversation we discussed the status of BP Oil's continued investigation into the construction standards employed by Mobil Oil Company during the installation of the underground storage tanks (UST) at the referenced site.

You indicated that you have exhausted all administrative means to determine whether the USTs at this site meet the alternative construction standards for new motor vehicle fuel tanks, pursuant to Section 2633, Title 23, California Code of Regulations (CCR). Your effort involved the request of as-built drawings and other pertinent construction records from Mobil Oil Company or their contractors which would illustrate whether the USTs met the alternative standards. Such efforts revealed that, according to records maintained by the tank manufacturer, Owens-Corning, the tanks installed at this site are single-walled. Further, in conversations with one contractor which bid on Mobil Oil Company projects during this period of time, a statement was made which indicated Mobil "...never used liners."

As you expressed in your October 22, 1990 correspondence to this Department, you plan to physically obtain the evidence of the actual tank installation standards "...via excavation or some other means." You mentioned a couple of different approaches to gather this information during our December 14 conversation. As I indicated, this Department requests that the methods you plan to employ, or have employed, to demonstrate the construction standards of the USTs must be presented in a letter report submitted to this Department by January 31, 1991.

The laws and regulations governing the proper construction of USTs are clear. The standards applicable to such construction at the time these tanks were installed must be adhered to. Therefore, please be advised that if your investigation revels the installation of the noted tanks did not meet the construction standards of that time (1984), there is no alternative but to remove the tanks.

Should you have any questions regarding the content of this letter, please call me at 415/271-4320. This Department appreciates your cooperation in this matter.

Sincerely,

Scott O. Seery
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Alameda County Environmental Health Department
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney
Howard Hatayama, DHS
Lester Feldman, RWQCB
Bob Bohman, Castro Valley Fire Department
Mike Hood, Alameda County Building Inspection Department
Steve Pao, Mobil Oil Company
Gary Stumps, Mobil Oil Company
files

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

R0346

Certified Mailer #P 062 127 930

Telephone Number: (415)

March 13, 1990

Mr. Bill Hollis
BP Oil Company
2868 Prospect Drive, Suite 360
Rancho Cordova, CA 95670-6020

RE: BP OIL COMPANY SERVICE STATION #11105, 3519 CASTRO VALLEY BLVD., CASTRO VALLEY, ALAMEDA COUNTY

Dear Mr. Hollis:

Reference is made to the February 6, 1990 correspondence from this office and our telephone conversation of March 7, 1990. As you will recall, our office has been attempting to clarify the following issues with regard to the fuel underground storage tanks (UST) at the former Mobil Oil Company service station noted above:

1) Determine the date(s) on which three (3) fuel USTs were installed. The record contains conflicting information; reference is made which indicates these USTs were installed both in 1984 and 1986;

2) Determine whether the UST installations comply with the standards for new motor vehicle tanks pursuant to Section 2633, Title 23, California Code of Regulations (CCR). These standards became effective for all new fuel UST installations occuring after January 1, 1984.

Pursuant to Subsection 2635 (c)(8), 23 CCR, we request, as local implementing agency, copies of as-built drawings which accurately and completely depict the actual location and orientation of the USTs and appurtenances at the time the USTs were installed. Your submittal should include copies of all drawings, plans, photographs, upgrades, manufacturer's descriptions of all components of the UST systems, and any other supporting information. Particular attention should be given to confirm that the required leak interception and detection system complies with the standards outlined in Subsection 2633 (d) - (f), 23 CCR, inclusive.

This information must be submitted within 30 days of the date of this letter, or by April 12, 1990.

Further action, if required, will be determined following review of the requested information. Should you have any questions, please call me at 415/271-4320.

Sincerely,

Scott O. Seery
Hazardous Materials Specialist

SOS:sos

cc: Rafat A. Shahid, Assistant Agency Director, Alameda County Department of Environmental Health
Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection Division
Mark Thompson, Alameda County District Attorney, Consumer and Environmental Protection Division
Lester Feldman, RWQCB
Bob Bohman, Castro Valley Fire Department
Mike Hood, Alameda County Building Inspection Department
Steve Pao, Mobil Oil Company
Gary Stumps, Mobil Oil Company
files

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

R0346

Telephone Number: (415)

February 6, 1990

Mr. Bill Hollis
BP Oil Company
2868 Prospect Drive, Suite 360
Rancho Cordova, CA 95670-6020

RE: BP SERVICE STATION #11105, 3519 CASTRO VALLEY BLVD., CASTRO VALLEY

Dear Mr. Hollis:

The intent of this letter is to follow-up our telephone conversation of February 1, 1990 during which you were requested to investigate your underground storage tank (UST) and other relevant records for the referenced site. This record review should focus upon the following points:

1) Determine the date(s) on which the three (3) fuel USTs were installed; and,

2) Determine whether the tanks are of single- or double-walled construction. Provide evidence which leads to your conclusion.

Please provide this office with a report of your findings within 15 days of the date of this letter, **or by February 21, 1990.** Further action, if required, will be determined following review of the requested data.

Should you have any questions, please call me at 415/271-4320.

Sincerely,

Scott O. Seery
Hazardous Material Specialist

SOS:tln

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

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

R0346

December 13, 1989

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415) 271-4320

(4)

Ms. Lois Yee
Environmental Science Associates, Inc.
760 Harrison Street
San Francisco, CA 94107-1235

RE: Environmental Assessment for Alameda County Public Works Project: Redwood Road/A Street Improvements

Dear Ms. Yee:

We are in receipt of your letter dated December 5, 1989 requesting information from our files regarding underground storage tanks, leaks and hazardous materials associated with facilities along the route of the planned roadway expansion. A summary of this information is provided below, in the order in which these sites were listed in the referenced December 5 correspondence:

(R0285) 1. Xtra Oil Company dba Shell Oil Company,
3495 Castro Valley Blvd.

Underground Tanks:	currently four (4); one 1,000 gallon waste oil tank was removed in 1988
Year Installed:	1967
Material/type:	steel, single-wall
Capacities/Contents:	10,000 gallon each; gasoline (3), diesel (1)
Last tested:	August 30, 1989, all remaining tanks tested "tight"
Leaks:	Waste oil tank removed sometime during 3rd or 4th quarter of 1988 (not under proper permit). Sampling did not occur following closure. Aqua Science Engineers, Inc., reexcavated the waste oil pit and collected one (1) soil sample for laboratory analysis on May 5, 1989. This sample was analyzed for TPH-D, TOG, and volatile organics.

Results indicate 980 and 426 ppm of TPH-D and TOG, respectively. Further, toluene, ethylbenzene and xylenes were detected at 12, 18 and 266 ppb, respectively. No benzene was found in the analyzed soil sample.

A groundwater investigation is pending.

(R0346) 2. BP Station #11105 (formerly Mobil Oil Co.)
3519 Castro Valley Blvd.

Underground Tanks:	currently four (4); 380 waste oil tank removed in September, 1988
Year Installed:	1984 (1986?); new waste oil tank installed 4th quarter of 1988
Materials/type:	fiberglass, single-wall; fiberglass, double-wall (waste oil)
Capacities/Contents:	1,000 gallons, (waste oil); 6,000, 8,000, 10,000 gallons (gasoline)
Last tested:	Sept. 22, 1988 (fuel); Oct. 5, 1988 (waste oil)
Leaks:	Nine (9) holes were noted in steel 380 gallon waste oil tank removed on September 20, 1988. A Kaprealian Engineering, Inc. report dated October 17, 1988 indicates samples collected from beneath the tank and

from stockpiled soils were analyzed for TPH-D, TOG, BTEX and chlorinated hydrocarbons. Samples from beneath the tank indicate nondetectable levels of TOG and TPH-D. Benzene and toluene were detected at 6.8 and 9.5 ppb, respectively. One composite sample from stockpiled material previously excavated from the tank pit had 100 ppm TOG.

No further work has been required nor performed at this site.

3. Possible ex-Shell Oil Company Station
22222 Redwood Road

- no file on record

(R0275) 4. Former Chevron Station #902960
2416 Grove Way

Underground tanks:	none currently; three (3) fuel and one (1) waste oil tanks removed June 19, 1986
Year installed:	unk
Material/type:	unk
Capacities/Content:	550 gallon (waste oil); 2,000 and 7,500 gallon (gasoline)
Last tested:	unk
Leaks:	Tanks removed and soil samples

collected June 19, 1986. Samples collected by Blaine Tech Services, Inc. from fuel tank pit as high as 14,000 ppm (1.4%) TPH-G,as reported July 10, 1986. No analysis for BTEX performed at this time. TOG analysis of soil samples collected from beneath waste oil tank N.D.; no volatile or chlorinated hydrocarbons, nor TPH-G or -D analysis performed. Subsequent reports by Blaine Tech Services dated August 5 (2) and Sept. 9 and 11, 1986 document composite sample analysis before, during and after on-site aeration of stockpiled soils previously excavated from tank pits. A report dated August 21, 1986 documents analysis of sidewall sampling following limited reexcavation laterally to the west in the NW corner of the fuel tank pit on August 8, 1986. Latent contamination is reported to be as high as 170 ppm TPH-G where sampled. Excavation vertically appears to have terminated at approximately 23 feet below grade (BG).

A report by Emcon Associates, dated Nov. 4, 1986 documents the installation October 1, 1986 of four (4) on-site groundwater monitoring wells to a total depth of 30.5 feet. Groundwater was first encountered at approximately 17 feet BG. Strong product odor was detected in drilling spoils from two (2) borings (C-1 and C-3) in the interval between 9 to 20.5 feet BG.

On October 9, 1986 Gettler-Ryan, Inc. field checked for water level and presence of floating product; no floating product was detected in any wells but strong product odor was evident in well C-1 installed within the former fuel tank pit. Water samples were collected for laboratory analysis on October 23, 1989 and analyzed for TPH-G and BTX. All wells showed evidence of dissolved hydrocarbons, with well C-1 having benzene, toluene, xylenes and TPH-G concentrations of 6.4, 3.7, 4.3 and 37 ppm, respectively.

EA Engineering, Science and Technology, Inc. submitted to Chevron, under cover dated November 11, 1987, a "Report of Investigation and Risk Assessment". EA's work was performed to direct next appropriate actions at the site. On September 10, 1987, EA sampled the four (4) existing monitoring wells. Laboratory analyses report levels of dissolved benzene, toluene, xylenes, ethylbenzene, and TPH-G as high as 25, 60, 79, 13, and 120 ppm, respectively, in water sampled from "MW-1" (C-1), an increase in dissolved hydrocarbon concentrations of approximately one order-of-magnitude. Wells "MW-2" (C-2) through "MW-4" (C-4) showed slight-to-moderate increases or decreases in concentrations of BTX and TPH-G. Ethylbenzene concentrations are not compa-

rable to previous analyses because the presence of this analyte was not discussed in past reports. No depth to groundwater data was reported. EA concludes that the existing contamination poses no risk to human health or the environment and recommends no further action except continued annual sampling and analyses of water from the on-site monitoring wells.

A Gettler-Ryan summary dated September 27, 1988 reports monthly monitoring data between March 6, 1987 through August 26, 1988. Floating product was detected during nine of the sixteen monitoring episodes occurring during this period of time in well C-1, including the last episode, August 26, 1988, during which 0.85 feet of product was noted. Floating product was found in each of the remaining three (3) wells at some point during this stretch of monthly sampling. No further sampling has been reported nor performed since August, 1988.

During site regrading (date?) by new property owners, the wells were inadvertently covered, as reported October 9, 1989 by Chevron. Gettler-Ryan was recently successful in locating and uncovering the wells. It is reported by Chevron that quarterly sampling of these wells and reporting by Gettler-Ryan will now resume.

(R0355) 5. Former Beacon Station #0574
22315 Redwood Road

Underground Tanks:	none currently; four (4) fuel and one (1) waste oil tanks removed May 5, 1987
Year installed:	1966 (?)
Material/type:	steel, single-walled
Capacities/Contents:	500 gallons (waste oil); 5,000 (2) gallons (diesel); 7,500 and 8,000 gallons (gasoline)
Last tested:	July 14, 1986; all tanks tested "tight" following minor repair to vapor recovery system of premium unleaded tanks
Leaks:	Relatively high levels of hydrocarbons detection in soils following tank closures on May 5, 1987. An Applied GeoSystems report dated June 25, 1987 documents initial soil sample analysis results which identify initial TPH-G and TPH-D concentrations as high as 3264 and 2898 ppm, respectively. Benzene, toluene, xylenes and ethyl-benzene was found to be as high as 89, 90, 248 and 559 ppm, respectively. Fairly low levels of TPH-G, TPH-D and BTEX were detected in the waste oil excavation. Applied GeoSystems returned to the site on May 18, 1987

to oversee over excavation of the fuel tank pit. A geologist from this firm observed that contamination was not confined to the tank pit, but had migrated laterally towards the north and eastern ends of the excavation. Vertical excavation ceased at approximately 20 feet BG. Latent contamination remaining in certain areas of the pit were reported as high as 1989 and 1192 ppm as TPH-G and TPH-D, respectively. Recommendations made to Beacon at this time were to proceed with a groundwater investigation.

No further work has been done at this site. No monitoring wells are known to currently exist on or off-site.

A request was recently issued from this department for the submittal of a site assessment proposal to address contamination underlying this site. Submittal is pending.

6. Don Williams and Son Auto Repair
   Corner of 6th and Knox Streets

   - no file on record -

7. Keith's Transmission
   22312 Redwood Road

   Underground Tanks: one (1)

Year installed: 1981

Material/Type: steel, single-walled

Capacities/Contents: 1,000 gallon, waste oil

Last tested: pending; first test scheduled for week for December 17, 1989

Leaks: unk

Other materials handled: transmission oil (new and used), petroleum based solvents, parts washer liquid and sludge.

8a. Manor Cleaners
20857 Redwood Road

Underground tanks: NA

Leaks/discharges: unk

Materials handled: perchloroethylene; (presumed) detergents, bleach, spotting liquids, other solvents, waste still oil and filters

8b. Mirande One-Hour Cleaners
21120 Redwood Road

Underground Tanks: NA

Leaks/Discharges: unk

Materials handled: perchloroethylene, waste still oil and filters; (presumed) detergents, bleach, spotting liquids, other solvents

This summary is limited to information available to this office and does not include any information available to other agencies or businesses which may be involved with these properties.

Please also find enclosed a copy of the invoice sent to our Billing Unit.

Should you have any further questions, please contact the undersigned at (415) 271-4320.

Sincerely,

Scott Seery
Hazardous Materials Specialist

SOS:mnc

Enclosure (1)

cc: Robert Hale, Alameda County Public Works
Rafat A. Shahid, Assistant Agency Director, Environmental Health
Files