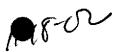
ALAMEDA COUNTY HEALTH CARE SERVICES

ARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



DO SUB

ENVIRONMENTAL HEALTH SERVICES

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

STID 1252

November 13, 2002

Mr. Chris Panaitescu Thrifty Oil Company 13539 E. Foster Road Santa Fe Springs, CA 90670-0138

RE: Thrifty Station #054, 2504 Castro Valley Boulevard, Castro Valley

Dear Mr. Panaitescu:

I am in receipt of "File Review for On and Off-site Petroleum contamination" Document concerning RS-9 well destruction Request, dated August 12, 2002 submitted by Mr. Raymond C. Friedrichsen of Thrifty Oil Company, regarding the above referenced site. I have reviewed this document along with other document available at our office. I have made few observations, which I would to share with you regarding this issue:

- It is true that groundwater flow has been estimated to be moving in an easterly direction
 in general. However in the past, the flow had been indicated westerly at least once.
 This may have been due to wrong calculation and or other reasons. However, my letter
 would reflect to what has been reported by your consultant. Nonetheless this office
 agrees with the notion that the flow gradient, in general, seems to be easterly at the
 above reference site.
- If the groundwater flow were assumed easterly, RS-9 well would be defined as an up gradient well. This would make RE-2 well down gradient from RS-9 well. Per your assumption there two distinct separate plumes, one at your site and one at the neighboring property. However, we could not assume a separate plume unless RE-2 had always revealed a non-detect status. But there has been oscillation in the concentration of some of the constituents in both RE-2 and RS-9 wells. There is also possibility of co-mingling plumes. Therefore, this office needs more information regarding definition of the plume specifically around RE-2 before making a final decision regarding closure of RS-9 well.

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

Sincerely,

James Coffee Variable

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Earth Management Co. Environmental Remediation, 13415 Carmenita Road P.O. Box 2129, Santa Fe Springs, CA 90670 Files

ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY



06-27-02

RQ348

STID 1252

June 24, 2002

Mr. Chris Panaitescu Thrifty Oil Company 13539 E. Foster Road Santa Fe Springs, CA 90670-0138

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

RE: Thrifty Station #054, 2504 Castro Valley Boulevard, Castro Valley

Dear Mr. Panaitescu:

I have received and reviewed "well Abandonment Request" dated May 14, 2002 submitted by Mr. Raymond C. Friedrichsen of Thrifty Oil Company, regarding the above referenced site. However, per our discussion, I do not concur with your proposal due to the following:

- Groundwater flow has been estimated to be moving in a westerly direction in the past.
 This would define RS-9 as a down gradient rather than an up-gradient well. Additionally,
 there has been seems oscillation in concentration of some of the constituents in both
 RE-4 and RS-9 well.
- During the last monitoring, RS-9 well revealed 1,540ppb, <0.18ppb, and 3,360ppb of TPH, Benzene, and MTBE respectively. This indicates an increase in the concentration of MTBE since previous report. Therefore, it would make it illogical to close this well while it is providing some valuable information.
- Any allegation of pollution and or contamination by the activities by the neighboring property must be substantiated by actual objective field data rather than a mere opinion.

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

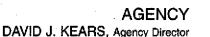
Sincerely,

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Earth Management Co. Environmental Remediation, 13415 Carmenita Road P.O. Box 2129, Santa Fe Springs, CA 90670 Files

ALAMEDA COUNTY **HEALTH CARE SERVICES**





STID 1252

November 6, 2001

Mr. Chris Panaitescu Thrifty Oil Company 13539 E. Foster Road Santa Fe Springs, CA 90670-0138

ENVIRONMENTAL HEALTH SERVICES **ENVIRONMENTAL PROTECTION** 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

(510) 567-6700 FAX (510) 337-9335

RE: Thrifty Station #054, 2504 Castro Valley Boulevard, Castro Valley

Dear Mr. Panaitescu:

I have received and reviewed the "3rd Quarter 2001, Status Report" dated October 29, 2001, regarding the above referenced site, submitted by Mr. Chris Panaitescu of Thrifty Oil Company.

Previous analysis of some of the wells indicated some significant change in concentrations of some of the wells. This included the following wells:

- RE-3 well at 649, 28, and 2,560, which indicated a significant increase in the concentrations since previous analysis.
- RE-4 well at 409, 18, and 1,480, which indicated a significant increase in the concentrations since previous analysis.

With the exception of the above and RE-7 well, the remaining wells were found at low or nondetect levels during the last analysis. Therefore, this office was concerned about the increasing plume and requested further investigation to be performed. However, during this analysis the concentrations of the above wells have decreased to "non-detect" and or low levels. Therefor, you may postpone this analysis pending the result of two consecutive future analyses as requested.

Per figure 1 within this report, groundwater flow seems to be moving westerly at 0.02, 0.07, and 0.09 ft/ft at the above referenced site.

You may skip analysis of the monitoring wells, which have historically revealed non-detect and or very low concentrations of the constituents in the past.

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

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Earth Management Co. Environmental Remediation, 13415 Carmenita Road P.O. Box 2129, Santa Fe Springs, CA 90670 Files

ARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director

9-20-01

RD348

September 19, 2001

STID 1252

Mr. Chris Panaitescu Thrifty Oil Company 13539 E. Foster Road Santa Fe Springs, CA 90670-0138 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250

(510) 567-6700 FAX (510) 337-9335

Alameda, CA 94502-6577

RE: Thrifty Station #054, 2504 Castro Valley Boulevard, Castro Valley

Dear Mr. Panaitescu:

I am in receipt of " 2nd Quarter 2001, Status Report" dated July 18, 2001, regarding the above referenced site, submitted by Mr. Larry Higinbotham of Thrifty Oil Company. I have reviewed this document and would like to make the following comments:

Per this report, The following wells indicated the following concentrations (PPB) of TPH, Benzene, and MTBE respectively:

Wells with significant concentrations of constituents during this period included:

- RE-3 well at 649, 28, and 2,560. This indicates a significant increase in the concentrations since previous analysis.
- RE-4 well at 409, 18, and 1,480. This reveals a significant increase in the concentrations since previous analysis.
- RE-7 well at 144, 5.0, and 408. This reflects some reduction in the concentrations since last analysis.

All other constituents concentrations within other wells were found at low or non-detect levels. However, some of the wells indicate a significant rise in concentrations while others show reduction in the concentrations of the constituents. The plume seems to be unstable. Please explain regarding the oscillation in the concentrations of the plume constituents and whether a new source is actually contributing to the increase of concentrations within the plume.

Furthermore groundwater flow seems to be moving in several directions at several speeds per figure 1 within this report. It may indicate "potential" existence of some form of preferential pathway at the site. Please elaborate on the groundwater flow gradient.

As indicated previously, some of the well samples revealed ND for all the contaminants present within the existing plume. However, this analysis is not necessary on all the wells. This includes all wells, which have shown to be ND for all contaminants historically in the several past analyses.

Please submit a workplan for further investigation.

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

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Earth Management Co. Environmental Remediation, 13415 Carmenita Road P.O. Box 2129, Santa Fe Springs, CA 90670 Files





04-25-01

ENVIRONMENTAL PROTECTION

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

FAX (510) 337-9335

1131 Harbor Bay Parkway, Suite 250

PFECS

ENVIRONMENTAL HEALTH SERVICES

DAVID J. KEARS, Agency Director

April 24, 2001

STID 1252

Mr. Chris Panaitescu Thrifty Oil Company 13539 E. Foster Road

Santa Fe Springs, CA 90670-0138

RE: Thrifty Station #054, 2504 Castro Valley Boulevard, Castro Valley

Dear Mr. Panaitescu:

Thank you for the submittal of "First Quarter 2001, Status Report" dated April 17th, 2001, regarding the above referenced site, submitted by Mr. Larry Higinbotham of Thrifty Oil Company. I have reviewed this document. Per this report, The following wells indicated the following concentrations (PPB) of TPH, Benzene, and MTBE respectively:

PW-1well at 600, <0.18, and 1,970

RE-2 well at 575, <0.18, and 2,070

RE-3 well at <50, <0.18, and 57

RE-6 well at 367, < 0.18, and 674

RE-7 well at 504, < 0.18, and 1,420

RS-9 well at 425, < 0.18, and 1,640

RS-11well at 408, < 0.18, and 941

All other constituents concentrations within other wells were found at low or nondetect levels. The benzene concentrations were all below detection limits. The highest concentration of MTBE and TPH-g were observed in PW-1 well and RE-2 well at 2,070ppb and 600ppb respectively.

Groundwater flow is to the east with a gradient of 0.03 to 0.07 ft/ft.

Some of the well samples revealed ND for all the contaminants present within the existing plume. However, this analysis is not necessary on all the wells. This includes all wells, which have shown to be ND for all contaminants historically in the several past analysis.

I understand Earth Management Co. Environmental Remediation will be conducting the Quarterly Monitoring Report as indicated within this report.

I do not concur with permanent closure of RS-9 well since it is providing valuable information regarding the plume either on site or off-site. However, you may further investigate the increase in MTBE concentrations at this well to discover the actual source of the increasing trend. It must be further verified to ensure whether it is indeed an upgradient source. You may submit a workplan for further investigation.

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

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Earth Management Co. Environmental Remediation, 13415 Carmenita Road P.O. Box 2129, Santa Fe Springs, CA 90670 Files

3-10-202~

ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

RO34B

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION

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

March 9, 2000

Tim Page
Project Manager
TAIT & ASSOCIATES, Inc.
2880 Sunrise Boulevard
Suite 206
Rancho Cordova, California 95742

RE: Tosco Facility #02486, 2504 Castro Valley Boulevard, Castro Valley, CA 94546

Dear Mr. Page:

The scope of work for the subject site has been completed under the oversight of this office. Your office was responsible for the submittal of the plans and permit fees.

The account established to fund the work performed is now in arrears. The cost of the project to this office totals \$840.00. The total fees paid by TAIT as of today is \$669.00.

Please remit a check payable to *Treasurer*, Alameda County, for the sum of \$171.00. Those funds will close the account on the current project at the subject site. Please reference STID# 1252, on your check.

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

Sincerely,

Robert Weston

Sr. Hazardous Materials Specialist

C: Tom Peacock, Manager, ACDEH

ALAMEDA COUNTY **HEALTH CARE SERVICES**

AGENCY

DAVID J. KEARS, Agency Director



FEB 1 5 2000

ENVIRONMENTAL PROTECTION (LOP)

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700 FAX (510) 337-9335

ENVIRONMENTAL HEALTH SERVICES

February 16, 2000

STID 1252

Mr. Chris Panaitescu Thrifty Oil Company 13539 E. Foster Road Santa Fe Springs, CA 90670-0138

RE: Thrifty Station #054, 2504 Castro Valley Boulevard, Castro Valley

Request for shutdown and removal of the vapor extraction system

Dear Mr. Panaitescu:

I have completed a review of your January 31, 2000 request to remove the vapor extraction system from the subject site. I have also had several conversations with Ray Friedrichsen of your staff over the last several weeks, including a conversation this morning, in clarification of the issues and reported product removal rates over the operational life of the remediation system.

Your request to shutdown and remove the vapor extraction system is granted. In addition, you may also discontinue the operation of the groundwater extraction and treatment system. I do not foresee any viable need for the system baring a substantial release of product from the tanks in the future.

Please continue your current well sampling, monitoring and reporting schedule.

Sincerely,

Scott O. Seer, CHMM

Hazardous Materials Specialist

Ariu Levi, Chief, Environmental Protection cc:

> Robert Weston, ACDEH Chuck Headlee, RWQCB

ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

R0348

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

May 5, 1999

STID 1252

Mr. Chris Panaitescu Thrifty Oil Company 13539 E. Foster Road Santa Fe Springs, CA 90670-0138

RE: Thrifty Oil Station #054, 2504 Castro Valley Boulevard, Castro Valley

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Panaitescu:

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

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

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

LANDOWNER NOTIFICATION

Re: 2504 Castro Valley Blvd., Castro Valley

May 5, 1999 Page 2 of 2

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

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

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

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

Sincerely,

Scott/O. Seery, CHMM

Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB

AGENCY



DAVID J. KEARS, Agency Director

R0#348

March 2, 1998

ENVIRONMENTAL HEALTH SERVICES

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

(510) 337-9335 (FAX)

STID#1252

Mr. Peter D'Amico 10,000 Lakewood Boulevard, Downey, CA 90240-4082

2504 Former Thrifty Oil Co. Station, 2591 Castro Valley Boulevard, Castro Valley CA 94546

Dear Mr. D'Amico:

This office is undertaking a review of the reports and submitted records of the aforementioned site. Following an evaluation of the documents as submitted, the ensuing comments are being forwarded to you for action:

- * It will be necessary for you to monitor well "RS-11" quarterly for chemical constituents, and forward said results, analyzed by a State Certified Laboratory, to this office for review.
- * Quarterly reports must be submitted to this office in an timely manner, the previous reports have a six (6) month time lag.
- * Are there any other vapor recovery wells besides the groundwater monitoring wells (UST pit , trenches, etc...)?
- * How is the groundwater removed by the groundwater extraction system being discharge? To where is it being discharged, and are influent/effluent tests being performed?

Please respond to these requests within thirty (30) days. office can be reached at (510) 567-6737.

Sincerely,

Buspaller

Brian P. Oliva, REHS, REA Hazardous Materials Specialist

Scott Hooten, BP Oil Co. Tina Berry, c/o Tosco, 2000 Crow Canyon Rd., San Ramon, CA 94583 files

BU

AGENCY DAVID J. KEARS, Agency Director R0348

RAFAT A. SHAHID, Assistant Agency Director

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

CC4586

June 1, 1995

STID 1252

Mr. Pete D'Amico Thrifty Oil Company 10000 Lakewood Boulevard Downey, CA 90240

RE: THRIFTY OIL COMPANY STATION #054, 2504 CASTRO VALLEY BLVD., CASTRO VALLEY

Dear Mr. D'Amico:

Review of the case file for this site, up to and including the May 15, 1995 1st quarter 1995 report, revealed that the technical reports issued since August 1994 were not submitted under seal of an appropriate, California-registered professional, as required pursuant to provisions of the California Business and Professions This issue has been brought to your attention previously in correspondence from this office dated October 26, 1992 and February 25, 1994.

This office advised you in the February 1994 correspondence that any future reports lacking such professional certification would not be accepted. The October 14, 1994, and February 11 and May 15, 1995 reports have been rejected for this reason. We will consider accepting the referenced reports if reviewed and modified where warranted, and certified by an appropriate professional registered in the State of California. Such certification should be in the form of a letter referencing the subject reports.

Additionally, the May 20, 1994 off-site well installation work plan was accepted June 9, 1994. We have been informed in every quarterly report issued since June 1994 that the work proposed in the accepted work plan was to begin during the following quarter. A year has now passed and the work has apparently still not begun. This is unacceptable. Our experience has shown that encroachment permits should have taken, at most, a couple of months to acquire from either Cal Trans or Alameda County Public Works.

We expect to be informed in the next 30 days that the subject field work has been scheduled to begin.

Mr. D'Amico

RE: 2504 Castro Valley Blvd., Castro Valley

June 1, 1995 Page 2 of 2

Should you have any questions, please contact me at 510/567-6783.

Sincerely,

Scott, O. Seety, CHMM

Sénior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director

Gil Jensen, Alameda County District Attorney's Office

Kevin Graves, RWQCB Scott Hooten, BP Oil



DAVID J. KEARS, Agency Director

R0348

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 1252

June 9, 1994

Mr. Peter D'Amico Thrifty Oil Company 10000 Lakewood Boulevard Downey, CA 90240

RE: THRIFTY OIL COMPANY STATION #054, 2504 CASTRO VALLEY BLVD., CASTRO VALLEY - ADDITIONAL OFF-SITE ASSESSMENT

Dear Mr. D'Amico:

Thank you for the recent submittal of the May 20, 1994 work plan for the installation of an additional well down-gradient of the referenced site. This work plan has been accepted as submitted.

Please contact this office when encroachment permits have been issued and field work is slated to begin. I may be reached at 510/271-4530.

Sincerely/

Scott O. Seery, CHMM

Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Ed Laudani, Alameda County Fire Department
Scott Hooten, BP Oil Company

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

DAVID J. KEARS, Agency Director

R0348

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

February 25, 1994

STID 1252

Peter D'Amico Thrifty Oil Company 10000 Lakewood Boulevard Downey, CA 90240

RE: THRIFTY OIL COMPANY STATION #054, 2504 CASTRO VALLEY BLVD., CASTRO VALLEY

Dear Mr. D'Amico:

This office has recently completed review of the case file for this site, including, but not limited to, reports documenting the results of monitoring, sampling, and operation of the RSI-SAVE ground water treatment unit for calendar year 1993.

During review it became apparent that reports documenting work which occurred during the 3rd and 4th quarters of 1993, dated November 26, 1993 and February 15, 1994, respectively, were not submitted under seal of a California-registered geologist or civil engineer. Provisions of the California Business and Professions Code require that technical reports requiring professional interpretation of data must be submitted under seal of an appropriate, California-registered professional. This issue was previously discussed in correspondence from this office dated October 26, 1992. Please be advised that future reports will not be accepted in the absence of this professional certification.

Review of historic sampling and monitoring data has revealed trends. Ground water has consistently been calculated to flow towards the east, essentially down the topographic slope, parallel to Castro Valley Boulevard. Ground water monitored in well RE-7 has exhibited product sheen or film, and during several past monitoring events, measurable product thicknesses were recorded. As you are aware, RE-7 is located within 10 feet or so of the eastern property line, adjacent to Castro Valley Boulevard. Off-site wells RS-8 and -10, located down- and cross-gradient of the site, have shown periodic "hits" for fuel hydrocarbons. Neither of these two wells, however, are located downgradient of RE-7. Hence, the extent of the plume downgradient of RE-7 has not been evaluated.

Mr. Peter D'Amico RE: 2504 Castro valley Blvd. February 25, 1994 Page 2 of 2

This issue and prospective well locations were discussed with Mr. Karl Kerner of Thrifty Oil during an on-site meeting which took place on January 16, 1991. This meeting was in part a result of the December 26, 1990 and July 14, 1989 correspondence from this office requesting the installation of an appropriate array of off-site wells. Several prospective locations were evaluated during our meeting, including one near or through the sidewalk in front of the pet store on the north side of Castro Valley Boulevard, directly east of the Thrifty station. A well in this location was never installed nor officially proposed. The data clearly indicate the need for such a well at this time, however.

At this time Thrifty Oil Company is requested to submit a work plan for the installation of a well or wells downgradient of RE-7 designed to define the downgradient extent of the plume, as noted above. This work plan is due within 45 days of the date of this letter, or by April 11, 1994.

Please call me at 5120/271-4530 should you have any questions.

Sincerely

Scott O. Seery, CHMM

Senior Hazardous Materials Manager

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Ed Laudani, Alameda County Fire District

Scott Hooten, BP Oil Company



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 23, 1993

Mr. Robert Zohir B P Oil Facility #02486 2504 Castro Valley Blvd. Castro Valley CA 94546

Re: Five Year Underground Storage Tank Permit 2504 Castro Valley Blvd., Castro Valley

Dear Mr. Zohir:

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

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0348

DAVID J. KEARS, Agency Director

STID 1252

October 26, 1992

Mr. PeteR D'Amico Thrifty Oil Company 10000 Lakewood Boulevard Downey, CA 90240 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

RE: THRIFTY OIL STATION #054, 2504 CASTRO VALLEY BOULEVARD, CASTRO VALLEY

Dear Mr. D'Amico:

This letter follows a telephone conversation I shared with Mr. Karl Kerner of your office on Friday, October 23rd. Mr. Kerner and I discussed several topics relating to the operational status of the S.A.V.E. soil vapor and ground water treatment system, plume control, and reporting elements, among other topics.

Mr. Kerner confirmed that the S.A.V.E. system had not been in operation to his knowledge for some while. Recent monitoring reports submitted by Thrifty Oil indicate that the last date of operation was January 29, 1992. The reason cited was the unavailability of a preferred fuel. I informed Mr. Kerner that during a site visit on October 21, 1992, I observed that the gauge atop the S.A.V.E. system fuel tank indicated that this tank was filled to 88% capacity. However, even though fuel seemed readily at hand, the system still appeared not to be in operation.

Data documenting the results of both subjective and quantitative ground water analyses from on-site wells indicate that both high dissolved concentrations, as well as free phase hydrocarbons, are still observed in nearly all of these wells. Further, although well RS-8, the off-site well located due east and downgradient of the site, did not exhibit detectable concentrations of target compounds during the latest reporting period (2nd Quarter 1992), RS-8 did exhibit such compounds during the previous reporting period.

This office is concerned that by not operating the S.A.V.E. system in a consistent manner, your ability to control further migration of the gasoline plume will be, or has already been, lost. Please bear in mind that the S.A.V.E. remediation system was originally approved for use because: 1) Thrifty was anxious to rebuild and reopen the station on behalf of their tenant at that time, Circle K Corporation, and 2) the S.A.V.E. system was touted as being as effective as excavation and treatment/disposal of contaminated soil.

Mr. Peter D'Amico RE: 2504 Castro Valley Blvd. Page 2 of 3 October 22, 1992

This office is not presently convinced that the S.A.V.E. system has had a significant effect in reducing the levels of contamination found in the underlying ground water and soils. Hydrocarbons readily adsorb to the type of silt and clay sediments which underlie this site. The vast majority of the released gasoline mass is likely still bound to the underlying sediments in this fashion, presenting a continual, long term source of contamination to ground water as it fluctuates in response to seasonal influences. However, the S.A.V.E system may be of some benefit for plume control.

Plume control or containment is to be the minimum objective for this site; overall site remediation and aquifer restoration will likely prove to be a goal much longer to realize, yet one which ultimately must be sought. To ensure that the minimum objective is met, the operation of the S.A.V.E system must be reinstated immediately, or another alternative for plume control and/or containment proposed, whether through hydraulic or other (e.g., encapsulation, etc.) means. Please be advised, however, that the S.A.V.E. system's viability in terms of plume control, will need to be evaluated by Thrifty Oil in the near future to determine if any additional measure is required to meet this plume control goal.

At this time, you may reduce sampling and monitoring frequencies from the present monthly schedule, to a quarterly schedule. Please be certain that each sampling and monitoring event is roughly no more, nor less, than three months apart from any prior or subsequent event. Target compounds shall remain TPH-G and BTEX.

Please include a running <u>tabulation</u> of all depth-to-water and elevation measurements for each monitoring event, to date, in each report. Hence, the next scheduled report, 3rd quarter 1992, should include not only the current tabulated data, but also a running tabulation of all previous ground water measurements. This will enable an efficient review of data and the observation of potential trends contributing to the distribution and concentration of contaminants in ground water.

Please include free product, TPH and benzene plume maps in each report. And, lastly, please be certain that each quarterly report is presented under signature of a California-registered or -certified professional geologist or civil engineer with the appropriate environmental background. This last request is a requirement of the Business and Professions Code, and Professional and Vocational Regulations.

Mr. Peter D'Amico

RE: 2504 Castro Valley Blvd.

October 26, 1992

Page 3 of 3

Please notify this office in writing within 15 days of the date of this letter of your intentions with regard to the operation of the S.A.V.E. remediation system.

Please feel free to contact me at 510/271-4530, or -4320, should you have any questions or comments.

Sincerely/

Scott/O. Seery, CHMM

Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director

Rich Hiett, RWQCB

Gil Jensen, Alameda County District Attorney's Office

Peter DeSantis, BP Oil

Ed Howell - files

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

Certified Mailer # P 062 /28 //0

December 26, 1990

Mr. Pete D'Amico Thrifty Oil Company 10000 Lakewood Boulevard Downey, CA 90240 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

RE: THRIFTY OIL COMPANY STATION #054, 2504 CASTRO VALLEY BLVD., CASTRO VALLEY, ALAMEDA COUNTY

Dear Mr. D'Amico:

Thank you for your recent submittal of the Decemeber 3, 1990 Dames & Moore quarterly report documenting sampling activities at the referrenced site occurring during October 1990. This report has been reviewed by this Department in context with data presented in the July 10, 1990 RSI report and the recent correspondence from this Department.

To reiterate the conditions outlined in the August 9, 1990 correspondence from this Department regarding the frequency of water level measurements and sampling of wells at this site, such sampling and water level measurements are to occur monthly until further notice. Please inform your consultants of this fact so that field activities may be appropriately scheduled and reports generated on time. Reporting will continue on a quarterly basis, as outlined in the August 9 correspondence. Following the January 7 sampling date, it is our hope that future sampling dates will be scheduled to meet these requirements. Further, please summarize and tabulate all sampling data collected to date in future reports to aid in the review of these reports.

The need to assess the impact to off-site ground water was first expressed in correspondence from this office dated July 14, 1989. A proposal was subsequently submitted by your consultant, RSI, dated September 5, and amended September 27, 1989. This proposal was approved by this Department on October 2, 1989. To date, no such off-site investigation has been initiated.

Both Thrifty Oil Company and RSI have indicated the difficulty in obtaining encroachment permits from either Cal Trans or the County Public Works Agency, as the area near Castro Valley Boulevard and Stanton Avenue was involved in a road widening project. This Department has not been officially updated on your success in receiving such permits since September 7, 1990; however, Mr. Karl Kerner of Thrifty informed me, during a phone conversation September 19, that County Public Works had recently submitted paperwork to Thrifty to complete. Once completed, Mr. Kerner indicated that the permits would be soon in coming.

Mr. Pete D'Amico

RE: 2504 Castro Valley Blvd.

December 26, 1990

Page 2 of 2

The July 10 and December 3, 1990 reports indicate that ground water flow directions have significantly shifted towards the east, likely due to seasonal or drought-induced trends. I indicated to Mr. Kerner during our September phone conversation that Thrifty should explore encroachment upon the adjoining property to the east for the installation of wells. The December 3 report further substantiates the need to install such wells. Therefore, you are directed to submit well installation proposals which address the statuatory requirement to track the migration of ground water contamination from your property to affected properties off-site. This will include wells to the east, reflecting the present trend in flow direction, as well as to the south and southeast, reflecting the trends in the recent past. This proposal is due within 30 days, or by January 26, 1991.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a late response could result in the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Please call me at 415/271-4320 should you have any questions regarding the content of this letter.

Sincerely,

Scott O. Seery

Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Department

Edgar Howell, Chief, Hazardous Materials Division Gil Jensen, Alameda County District Attorney's Office James Chu, Alameda County Public Works Lester Feldman, RWQCB Howard Hatayama, DHS

Bob Bohman, Castro Valley Fire Dept. Zane Robbins, Circle K Corp.

Wendy Wittl, RSI

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

Certified Mailer # P 062 128 223

August 9, 1990

Mr. Pete D'Amico Thrifty Oil Company 1000 Lakewood Boulevard Downey, CA 90240 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

RE: THRIFTY OIL COMPANY STATION #054 DBA CIRCLE K, 2504 CASTRO VALLEY BLVD., CASTRO VALLEY, ALAMEDA COUNTY

Dear Mr. D'Amico:

This letter follows our telephone conversation August 8, 1990 and this Department's review of the July 10, 1990 Remediation Service, Int'l. (RSI) monitoring report, as submitted under Thrifty Oil Company cover dated July 24, 1990. The noted report documents the results of monitoring well sampling and laboratory analyses performed during April 1990.

The results of sample analyses indicate that concentrations of dissolved phase hydrocarbons in water collected from the wells have generally increased since samples were last analyzed in April 1988. The exception is well RE-2 which showed a marked decrease in dissolved constituents, although the benzene concentration is still well above the current DHS Action Level (AL) of 1.0 ppb (RE-1 = 5.8 ppb). All other wells show levels of benzene, among other constituents, up to three orders-of-magnitude above the DHS AL, with RE-7 the most concentrated at 7,000 ppb benzene. Total petroleum hydrocarbons as gasoline (TPH-G) are as high as 600 ppm in water sampled from PW-2. The water sampling logs further indicated all wells sampled, except for RE-6 and -7, had noticeable product sheen; further, well PW-1 had "globs of product".

We understand that the TVSA-CTO remediation system has been on-line since April 1990, but only to the extent of extracting soil vapor rather than both vapor and ground water, although this system has been approved for use since November 1988. Further, installation of the TVSA-CTO system did not begin until sometime after August 1989, to some extent the result of the glacial pace at which the application for, and receipt of, permits from the Ora Loma Sanitary District, as well as those from the Bay Area Air Management District, proceeded.

Off-site assessment of soil and ground water, first requested in correspondence from this Department dated July 14, 1989, has still not been initiated, even though the September 5, 1989 RSI proposal, as amended, which addressed the issue of off-site investigation, was approved by this Department on October 2, 1989. Application for encroachment permits for off-site wells within the public right-of-way has been in process since the last quarter of 1989.

Mr. Pete D'Amico RE: 2504 Castro Valley Blvd. August 9, 1990

Page 2 of 3

It is evident that the remediation effort to date has not adequately reflected the severity of contamination underlying this site. Future investigation and remediation, both on and off-site, must proceed at a pace greater than that effected to date, and to a degree adequate to address the magnitude of the problem at this site. To this end, the following actions must be strictly followed:

- 1) All wells are to be sampled and water levels measured monthly. Reports are to be submitted quarterly. Such reports are to summarize the results of all monitoring, remediation efforts, assessments, permit status, and any other work related to this site which occurred during the reporting period. Such quarterly reports are due the first day of the second month of each subsequent quarter (i.e., November 1, February 1, May 1, and August 1). The next quarterly report is due November 1, 1990.
- 2) A contract for the installation of ground water pumps, pipelines, and other appurtenances associated with the ground water extraction/treatment system must be finalized by September 9, 1990.
- 3) The ground water extraction/treatment system must be on-line by October 9, 1990.
- 4) A report documenting the status of off-site well installations must be submitted by September 9, 1990. This report must discuss what efforts have been expended to date regarding the acquisition of encroachment permits for access to public property, and provide alternative locations upon privately held property for the requisite up- and downgradient wells. (Reference Figure 4 of the December 5, 1989 RSI letter report for potential well locations.)

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Failure to respond or a late response could result in the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil liabilities to a maximum of \$1,000 per day. Any extensions of stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB. Further, copies of all reports and correspondence must also be sent to the RWQCB, to the attention of Mr. Lester Feldman.

Mr. Pete D'Amico RE: 2504 Castro Valley Blvd. August 9, 1990

Page 3 of 3

Available funds within your current deposit/refund account total approximately \$45. Please remit a check, made out to Alameda County, totalling \$744 to cover future expenses incurred by the county in oversight of this project.

Please call me at 415/271-4320 should you have any questions regarding the content of this letter.

Sincerely,

Scott/O. Seery Hazardous Materials Specialist

Rafat A. Shahid, Assistant Agency Director, Alameda County Department of 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

Zane Robbins, Circle K

files

DEPARTMENT OF ENVIRONMENTAL HEALTH

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

(415)

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

Certified Mailer # P 062 127 862

July 12, 1990

Mr. Pete D' Amico Thrifty Oil Company 1000 Lakewood Boulevard Downey, CA 90240

RE: THRIFTY OIL COMPANY STATION #054 DBA CIRCLE K, 2504 CASTRO VALLEY BLVD., CASTRO VALLEY, ALAMEDA COUNTY

Dear Mr. D 'Amico:

Reference is made to the correspondence from this office dated February 22, 1990. This correspondence identified the current need to actively monitor the existing on-site ground water wells at the noted site quarterly. You were, and are, to report the results of this monitoring, and all other remediation, assessment, or other work related to this site, to this office and the RWQCB on a quarterly basis. Such quarterly reports are due for submittal the first day of the second month of each subsequent quarter (i.e., May 1, August 1, November 1, and February 1), and required for the duration of all remediation or assessment work related to this site.

To date, no quarterly reports have been received by this office since the February 22 notification from this office: the May 1 report is currently overdue; the August 1 report is due in approximately 2 1/2 weeks. Further, no reports documenting well sampling activities have been submitted since our receipt of the April 11, 1988 Robert Elbert and Associates technical report.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a late response could result in the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Please call me at 415/271-4320 should you have any questions regarding the content of this letter.

Sincerely

Scott 0. Seery

Hazardous-Materials Specialist

Mr. Pete D 'Amico

RE: 2504 Castro Valley Blvd.

July 12, 1990 Page 2 of 2

CC: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Department
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 Dept.
Zane Robbins, Circle K Corp.
Wendy Wittl, RSI

AGENCY DAVID J. KEARS, Agency Director



R0348

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH 470 - 27th Street, Third Floor Oakland, California 94612 (415)

February 22, 1990

Mr. Pete D' Amico Thrifty Oil Company 1000 Lakewood Blvd. Downey, CA 90240

RE: THRIFTY OIL COMPANY STATION #054, 2504 CASTRO VALLEY BLVD., CASTRO VALLEY

Dear Mr. D' Amico:

Following review of information contained in the files for the referenced facility, it has come to our attention that sampling and analysis of groundwater from the on-site wells has not been reported since receipt of the April 11, 1988 Robert Elbert and Associates technical report. Further, although the TVSA-CTO remediation system has been approved for use since October 2, 1989, and the system installed by December 1989, extraction and treatment of groundwater has yet to occur.

A baseline determination of current groundwater contaminant levels is required so that the effectiveness of the remediation system can be properly gauged. Once operating, samples will need to be collected and analyzed at a frequency sufficient to assess the rate at which contamination is reduced through the use of this system.

During this interim period before the remediation system is on-line, as well as after the system is operating, <u>all</u> monitoring wells are to be sampled quarterly, at a minimum. Sampling activities occuring within a given quarter must be followed by a quarterly report, due the first day of the second month of each subsequent quarter (i.e., May 1, August 1, November 1, and February 1), and shall include a summary of results of all work and laboratory results to date. The next quarterly report is due May 1, 1990 and must include, among others, a discussion of activities which occurred during the first quarter of 1990.

Mr. Pete D' Amico

RE: 2504 Castro Valley Blvd.

January 21, 1990

Page 2 of 2

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

Sincerely/

Scott O. Seery

Hazardous Materials 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.

Howard Hatayama, DHS

Zane Robbins, Circle K Corporation

Wendy Wittl, RSI



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

October 5, 1989

Mr. Pete D'Amico Thrifty Oil Company 10000 Lakewood Blvd. Downey, CA 90240

RE: THRIFTY OIL COMPANY STATION #054, 2504 CASTRO VALLEY BLVD., CASTRO VALLEY

Dear Mr. D'Amico:

This letter follows the completion of activities involving the removal and installation of three (3) underground fuel storage tanks at the referenced site, and the initiation of field work and construction for the assessment and remediation of groundwater contamination associated with this site.

This office, following the final inspection of this facility on October 4, 1989, feels that Thrifty Oil has satisfied the requirements of Title 23, Subchapter 16 of the California Code of Regulations (CCR) for new tank installations. Further, we are confident that site remediation and off-site assessment activities are currently on track. Therefore, this letter shall serve as approval from this company to reopen this facility. The issuance of a 5-year underground storage tank permit will be forthcoming.

Ms. Wendy Wittl

RE: 2504 Castro Valley Blvd.

Castro Valley October 2, 1989

Page 2 of 2

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

Sincerely,

Scott O. Seery

Hazardous Materials Specialist

SOS: mam

cc: Zane Robbins, Circle-K Corporation

Gil Jensen, Alameda County District Attorney, Consumer and

Environmental Protection Division

Rafat A. Shahid, Director, Alameda County Department of

Environmental Health

Lester Feldman, RWQCB

Howard Hatayama, DHS

Darrel Nelson, BAAQMD

Bob Bohman, Castro Valley Fire Department

Mike Hood, Alameda County Building and Inspection Department

James Chu, Alameda County Public Works Department

Files



October 2, 1989

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

Ms. Wendy Wittl
Remediation Services, Int'l.
P. O. Box 1601
Oxnard, CA 93022

RE: PHASE II SITE ASSESSMENT WORKPLAN: OFF-SITE INVESTIGATION,
THRIFTY OIL COMPANY DBA CIRCLE-K, 2504 CASTRO VALLEY BLVD.,
CASTRO VALLEY

Dear Ms. Wittl:

We are in receipt and have completed review of the latest site assessment proposal submitted by RSI dated September 5, 1989, the amendment to this plan dated September 27, 1989, and the associated letters and permit requests addressed to other agencies involved in this remediation, which are dated August 22 and September 8, 1989. We have accepted this work plan proposal with the following conditions:

- 1) A Site Safety Plan must be in effect at the time any and all field work activities are conducted. This plan must follow guidelines specified under Part 1910.120(i)(2) of 29 CFR (attached);
- 2) On-site remediation of groundwater underlying this site using the approved TVSA-CTO system should be scheduled to begin as soon as the requested discharge permit is issued from Oro Loma Sanitary District. Failing to receive said permit in a timely fashion will require the implementation of other interim (or permanent) discharge or storage measures for extracted and treated groundwater. We strongly recommend that this phase of work occur contemporaneously with any off-site work so that the overall cleanup of the site is expedited;
- 3) Following well development, as described in the September 27, 1989 addendum, attempt to characterize the adequacy of development through measurement of pH, specific conductance, and temperature to determine that the formation water has stabilized. These techniques should be used to supplement the visual technique previously discussed in the noted addendum;

Ms. Wendy Wittl

RE: 2504 Castro Valley Blvd.

Castro Valley October 2, 1989 Page 2 of 2

- 4) Sampling of wells should occur a minimum of 24-hours after well development. It is strongly recommended that a period of 72-hours pass between development and sampling, however, so that any low-density, immiscible organics present can stabilize, facilitating the identification of any floating product;
- 5) Those analytical test methods used in the quantification of contaminants in samples collected during boring advancement and from completed wells must be methods accepted by the State Hazardous Waste Testing Laboratory Certification Program. These methods may only be performed by State-Certified laboratories approved for the use of the cited methods.

Please contact this office when encroachment and discharge permits are received, and when you are scheduled to begin work at the site. Should you have any questions, please contact me at (415) 271-4320.

Sincere/x

Scott O Seery

Hazardous Materials Specialist

SOS: mam

attachment

CC: Pete D'Amico, Thrifty Oil Company
Zane Robbins, Circle-K Corporation
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Rafat A. Shahid, Director, Alameda County Department of
Environmental Health
Lester Feldman, RWQCB
Howard Hatayama, DHS
Darrel Nelson, BAAQMD
Bob Bohman, Castro Valley Fire Department
Ed Heuer, Oro Loma Sanitary District
Mike Hood, Alameda County Building and Inspection Department
Robert Michael, RSI
Scott Seery, Alameda County Hazardous Materials Division
Files



July 14, 1989

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

Mr. Pete D'Amico Thrifty Oil Company 1000 Lakewood Blvd. Downey, CA 90240

RE: THRIFTY OIL COMPANY STATION #054 DBA CIRCLE K CORPORATION, 2504 CASTRO VALLEY BLVD., CASTRO VALLEY, ALAMEDA COUNTY

Dear Mr. D'Amico:

This letter is in response to your letter dated December 6, 1988 which referenced the November 23, 1988 correspondence from this office, and a telephone conversation on July 10, 1989 between Mr. Terry Masters of Sacramento Equipment Maintenance Company and Mr. Scott Seery of this office regarding the noted site. Mr. Masters inquired as to any additional requirements Alameda County may have before allowing the station to reopen.

In review of this site's record, it has come to our attention that several items involving the closure of three (3) underground storage tanks (UST) in November 1988, the Thermal Vacuum Spray Aeration-Compressive Thermal Oxidation (TVSA-CTO) remediation system, as proposed by Robert Elbert & Associates under cover dated April 26, 1988, and fuel contamination investigation are outstanding. Following is a listing of those items which must be adequately addressed, and acknowledged as such by this office, before the noted station may resume operation:

- Supply copies of completed manifests which accompanied the disposal of the USTs removed in November 1988;
- 2) Supply copies of the original chain-of-custody forms, lab results, and receipts/manifests which reflect the ultimate handling, transport, and disposal of the contaminated soils previously stockpiled on-site;
- 3) Provide a schedule for the installation and implementation of the approved TVSA-CTO remediation system. This item was requested previously in the referenced November 23, 1988 correspondence from this office;
- 4) Discuss what steps have been taken, to date, to determine what

Mr. Pete D'Amico RE: Circle K Corp. 2504 Castro Valley Blvd. Castro Valley July 14, 1989 Page 2 of 3

permits must be procured for the discharge of groundwater following treatment of same using the TVSA-CTO system;

5) Indicate which, if any, of the monitoring wells still remain intact following UST closures, whether new wells will require installation to facilitate use of the TVSA-CTO remediation system and, if so, discuss well placement rationale and the procurement of well installation permits. Any additional well installations must be in the form of proposals submitted for approval by this department.

Additionally, the April 11, 1988 Robert Elbert & Associates (REA) subsurface investigation report, submitted under cover dated April 14, 1988, clearly identifies the need to further assess the lateral and vertical impact off-site upon soils and groundwater by fuel hydrocarbons. Gradient determinations made by REA in February and March 1988 indicate the general direction of groundwater flow to be to the southeast. Well RE-7, located at the far southeastern corner of the property, has shown evidence of substantial impact to both soils and groundwater by fuel constituents. levels of contamination in sampled groundwater upgradient from the former UST cluster (eg., RE-1) are also elevated. In all cases, concentrations of dissolved benzene in groundwater sampled from wells RE-1 through RE-7 were four to five order-of-magnitude higher than the State Department of Health Services Action Level (DHS-AL) of The concentrations of most other fuel constituents for which analyses were performed also exceeded DHS-AL criteria in groundwater sampled from these same wells. Additionally, total purgeable petroleum hydrocarbons were detected in each water sample at concentrations up to 150 ppm (See: Table 4, 11 April 88 REA report).

Such elevated contaminant concentrations found in groundwater and soils along the perimeter of this site, both up- and downgradient, substantiates the likelihood of off-site migration of the contaminant plume. Consequently, additional investigative work must be conducted in order to fully assess the extent, both vertically and laterally, of any impact upon groundwater and soils off-site. This supplemental work must be conducted in accordance with the San Francisco Bay Regional Water Quality Control Board (RWQCB) "Regional Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks." The major elements of such an investigation are summarized in the attached Appendix A.

In order to proceed with this aspect of the investigation, you should obtain professional services from a reputable engineering/ geotechnical consulting firm. The responsibility of your consultant is to submit for review a proposal outlining planned activities pertinent

Mr. Pete D'Amico RE: Circle K Corp. 2504 Castro Valley Blvd. Castro Valley July 14, 1989 Page 3 of 3

to meeting the criteria outlined in this letter and the attached Appendix A. Once this phase of the off-site assessment has been completed, a technical report summarizing site related activities, conclusions, and any recommendations for additional work must be submitted to this office and RWQCB. All reports and proposals must be submitted under seal of a California-Certified Engineering Geologist, California-Registered Geologist or California-Registered Civil Engineer.

This office will oversee the assessment activity for the referenced site. This oversight will include our review and comment on work proposals, and technical guidance on appropriate investigative approaches. However, the issuance of monitoring well installation permits will be through Zone 7. Further, the Alameda County Department of Public Works may need to be contacted to obtain encroachment permits for any wells drilled in public right-of-ways.

Please submit within thirty (30) days of the receipt of this letter your response to items 1 through 5, and the requested additional site assessment proposal. Accompanying this proposal must be a check totalling \$663.00 to help defer the cost of our review of this plan and oversight of the assessment/remediation process. This check should be made payable to the County of Alameda. A copy of this proposal should also be sent to the RWQCB (Attn: Scott Hugenberger) for their review.

If you have any questions, please call Scott Seery, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,

Rafat A Shahid Chi

Rafat A. Shahid, Chief Hazardous Materials Division

RAS: SOS: mam

Enclosure

cc: Diane Kasari Henry, Robert Elbert & Associates
Howard Hatayama, DOHS
Scott Hugenberger, RWQCB
Bob Bohman, Castro Valley Fire Department
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Mike Hood, Alameda County Building and Inspection Department
Scott Seery, Alameda County Hazardous Materials Division
Files

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

DAVID J. KEARS, Agency Director

R0348

November 23, 1988

ريان يا بع

Mr. Peter D'Amico, Manager, Environmental Affairs Thrifty Oil Co. 10000 Lakewood Blvd. Downey, CA 90240

RE: Thrifty Oil, 2504 Castro Valley Blvd., Castro Valley, CA

Dear Mr. D'Amico:

We have received your letter dated April 29, 1988, that you wrote to Greg Zentner of the Regional Water Quality Control Board and your proposed remediation plan prepared by Robert Elbert and Associates, dated April 26,1 988. This plan has been reviewed and accepted. Installation may commence under the conditions stated below.

Although the County of Alameda is the lead agency at this time, the Regional Water Quality Control Board has responsibilities for overseeing all cases that may affect groundwater. Copies of all correspondence to this office should be submitted to RWQCB.

Please submit to our office within thirty (30) days:

- Work schedule for installation of your remedial system, including estimated date it will be operating.
- Signed certify laboratory report of analysis done on samples taken at the above site on November 10, 1988.

Mr. Peter D'Amico, Manager, Environmental Affairs Thrifty Oil Co. 10000 Lakewood Blvd. Downey, CA 90240

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

Sincerely,

Rafat A. Shahid, Chief, Hazardous Materials Program

RAS: mnc

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

Dwight Hoenig, DOHS Circle K Corp. Lisa McCann, RWQCB AGENCY DAVID J. KEARS, Director

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

Ro348

Telephone Number: (415) 271-4320

Certified Mail #P 708 402 822

November 17, 1988

Mr. Peter D'Amico, Manager, Environmental Affairs Thrifty Oil Co. 10000 Lakewood Blvd. Downey, CA 90240

RE: Circle K, 2504 Castro Valley Blvd., Castro Valley

Dear Mr. D'Amico:

Installation of the new underground storage tanks at the above site cannot commence until a plan of correction has been received and approved by our office.

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

Sincerely,

Rafat A. Shahid, Chief,

Hazardous Materials Program

RAS: LS: mnc

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

Dwight Hoenig, DOHS Circle K Corporation

Terry Masters, Sacramento Equipment

RO348

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

February 10, 1988

Mr. David Henry Robert Elbert & Associates 18 Anacapa St., 2nd Floor Santa Barbara, CA 93101

Dear Mr. Henry:

Your proposal for further site assessment at Thrifty Oil Company, Station #54, at 2504 Castro Valley Blvd., Castro Valley, CA, dated July 8, 1988, has been approved. The drilling of five monitor wells can proceed as scheduled on February 9, 1988.

Please send to our office, copies of all well drilling logs and water analysis.

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

Sincerely,

PItA SLL

Rafat A. Shahid, Chief, Hazardous Materials Division

RAS:LS:mnc

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

Dwight Hoenig, DOHS Greg Zentner, RWQCB

Certified Mailer No. P 119 028 776

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

May 4, 1987

Mr. Dick Lux Thrifty Gas #54 2504 Castro Valley Castro Valley, CA 94568

Dear Mr. Lux:

A letter dated March 17, 1987, was sent to you from our office, requesting a plan of correction for the determination of waste in four of your 55-gal. drums. A copy of the letter is attached. As of this date, we have not received your written plan of correction. Please submit this plan within 30 days of the receipt of this letter.

For your information, Section 25189(c), of the California Hazardous Waste Control Law, provide for civil and criminal penalties of up to \$25,000, per day, per violation of the California Hazardous Waste Control Law and Regulations.

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

Sincerly,

Rafat A. Shahid, Chief

PILASLU

Hazardous Materials Program

RAS:mn-c

Attachment

cc: Dwight Hoenig, DOHS
Gilbert Jensen, Alameda County Distirct Attorney, Consumer & Environmental Protection Agency

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

March 17, 1987

Mr. Dick Lux Thrifty Gas #54 2504 Castro Valley Castro Valley, CA 94568

Dear Mr. Lux:

An inspection was made on your property on March 12, 1987, by Lawrence Seto, from our office. He observed four full, unlabeled, 55 gallon drums of unknown material.

- Section 66471, California Administrative Code, requires the generator of a waste, determine if the waste is a hazardous waste.
- Section 66480, California Administrative Code, requires a generator who transports, or offers for transportation, hazardous waste for off-site disposal, shall prepare a manifest before transporting the waste off-site.
- Section 25189.5, Health and Safety Code, prohibits the disposal of any hazardous waste at any point which is not an authorized disposal site.
- Section 66328(d), Title 22, California Administrative Code, states that if corrections are needed, the operator shall provide the department with a written plan of correction, which states the actions to be taken and the expected date of completion.

Your plan of correction must include, but not be limited to the following:

- Method(s) used to determine whether the waste is a hazardous waste.
- 2. Name of licensed hazardous waste hauler if waste is hazardous and is taken for disposal
- 3. Disposal site.

Please submit your plan of correction to this office within 30 days of the receipt of this letter.

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The drums are not to be moved or taken for disposal until the waste has been categorized and your plan of correction approved.

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

Sincerely,

PACA.SW

Rafat A. Shahid, Chief, Hazardous Materials Program

RAS:mn-c

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