

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



7

ENVIRONMENTAL HEALTH SERVICES

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

April 6, 2006

Mr. Steve Coodey
Ultramar, Inc.
685 West Third Street
Hanford, CA 93230

Mr. Paul Wilson
1238 Stanyan Street
San Francisco, CA 94117

Castro Group LLC
2021 Francisco Street
Berkeley, CA 94709

Subject: Fuel Leak Case No. [REDACTED] 5, Former Beacon Station #12574, 22315 Redwood Road, Castro Valley, CA – Report Submittal to Alameda County FTP Site

Dear Mr. Coodey, Mr. Wilson, and Castro Group LLC:

You recently submitted a hard copy of a report for the above-referenced site entitled, "Semi-Annual Groundwater Monitoring Report, First Quarter 2006, Former Beacon Station No. 12574, 22315 Redwood Road, Castro Valley, California." The report was dated April 3, 2006 and was received by Alameda County Environmental Health (ACEH) on April 5, 2006. Please note that effective January 31, 2006, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Hard copies of reports are no longer accepted. **Therefore, please upload the "Semi-Annual Groundwater Monitoring Report," and all future reports to the Alameda County FTP site** as outlined in the following discussion of "Electronic Submittal of Reports," and the enclosed, "Electronic Report Upload (ftp) Instructions."

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, 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

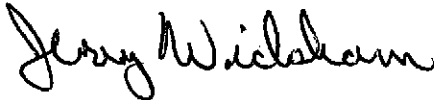
Mr. Steve Coodey
Mr. Paul Wilson
Castro Group LLC
April 6, 2006
Page 2

required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/usi/cleanup/electronic_reporting).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Karen Liptak
Horizon Environmental, Inc.
4870 Windplay Drive, #C5
El Dorado Hills, CA 95762

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

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

STID 3579

January 2, 2002

Mr. Joseph A. Aldridge, RG
Senior Project Manager
Retail Environmental Services
Ultramar, Inc.
525 West Third Street
Hanford, CA 93230

Re: Former Beacon Station at 22315 Redwood Road, Castro Valley, CA

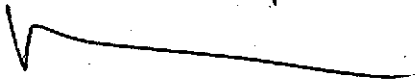
Dear Mr. Aldridge:

This office is in receipt of "Status Report Third Quarter 2000" prepared by Mr. Richard E. Johnson of BSK & Associates, Geotechnical Consultants, Inc. dated December 6, 2001 pertaining to the above referenced site. I have reviewed this report and would like to make the following comments:

- MW-3, MW-4, MW-5, MW-6 were not sampled. Excepting some MTBE in MW-6 at 96ppb, there has not been much contaminant detected within these wells.
- MW-1 and MW-2 wells are the most contaminated wells. There were 23,000ppb TPHg, 4,600ppb Benzene, and 450ppb MTBE in MW-1 well. This reveals some decrease in the concentrations of the constituents. However, MW-2 well indicated 63,000ppb TPHg, 4,400ppb Benzene, and 730ppb MTBE during this analysis. There is a huge increase in the concentrations of TPHg with some minor decrease in the concentrations of Benzene and MTBE.
- Per figure 3 within this report, groundwater flow gradient is moving Northwesterly at 0.015 ft/ft. Even though this gradient is very flat, there seems to be a change in its direction.
- MW-7 and MW-8 were abandoned in 1998 while MW-3, MW-4, MW-5, and MW-6 were not sampled since they have historically been revealing low concentrations of contaminants with the exception of MTBE within MW-6 well. Therefore, you may sample MW-6 on a semi-annual basis.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Amir K. Gholami', with a long horizontal stroke extending to the right.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Richard E. Johnson, BSK & Associates, Geotechnical Consultants, Inc.
3140 Gold Camp Drive, Suite 160, Rancho Cordova, CA 95670-6023
Files

Ultramar

Ultramar, Inc.
685 W. Third Street
Hanford, CA 93230-5016
(559) 582-0241

Fax: 559-583-3282 Environmental
559-583-3256 Retail Administration
559-583-3330 Human Resource
559-583-3382 Maintenance

September 4, 2001

Mr. Amir K. Gholami, REHS
Hazardous Materials Specialist
Alameda County Health Care Services Agency,
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Oakland, CA 94502-6577

**SUBJECT: Groundwater Monitoring Schedule
22315 Redwood Road, Castro Valley, California
Former Beacon Station #574**

Dear Mr. Gholami:

Ultramar, Inc. has received your letter dated August 27, 2001 (attached), regarding groundwater monitoring at the above referenced property. In accordance with your letter, we have advised our contractor to continue to sample monitoring wells MW-1 and MW-2 on their current semi-annual schedule and discontinue sampling of the other wells, due to their historic concentrations and trends. Groundwater elevations will be measured in all monitoring wells during each sampling event.

Sincerely,

ULTRAMAR INC.



Joseph A. Aldridge, RG
Senior Project Manager
Retail Environmental Services

Enclosure

cc: Mr. Richard Johnson, BSK & Associates, Inc.
Mr. Hal Hansen, Doulos Environmental Company
Mr. Bill Courtney



A Member of the Ultramar Group of Companies

BEACON
#1 Quality And Service

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RECEIVED
AUG 31 2001

BY:.....

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

SEP 10 2001

STID 3579

12574-24

August 27, 2001

Mr. Joseph A. Aldridge, RG
Senior Project Manager
Retail Environmental Services
Ultramar, Inc.
525 West Third Street
Hanford, CA 93230

Re: Former Beacon Station at 22315 Redwood Road, Castro Valley, CA

Dear Mr. Aldridge:

I have received and reviewed the "Status Report Second Quarter 2000" prepared by Mr. Richard E. Johnson of BSK & Associates, Geotechnical Consultants, Inc. dated August 14, 2001 pertaining to the above referenced site.

According to this report MW-1, MW-2, MW-3, MW-4, MW-7, and MW-8 were not sampled. In fact with the exception of some MTBE in MW-6 at 96ppb, there was not much contaminant detected within these wells.

MW-1 and MW-2 wells are the most contaminated wells as it was revealed during last analysis. There were up to 56,000ppb TPHg, 7,000ppb Benzene, and 620ppb MTBE in MW-1 well. MW-2 well revealed up to 33,000ppb TPHg, 5,200ppb Benzene, and 740ppb MTBE during the last analysis.

Per this report MW-5 well was sampled and indicated <0.50 of all constituents similar to previous analysis. MW-6 well only indicated decrease in MTBE concentration at 96ppb. Please be advised that all the wells, which have historically been revealing low concentrations of contaminants, need not be sampled any longer unless otherwise advised by this office as indicated previously.

According to figure 3 within this report, groundwater flow gradient is moving south southwesterly at 0.01 ft/ft.

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

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

SEP 10 2001

C: Mr. Richard E. Johnson, BSK & Associates, Geotechnical Consultants, Inc.
3140 Gold Camp Drive, Suite 160, Rancho Cordova, CA 95670-6023
Files

W.A. CRAIG, INC.
Environmental Consulting & Construction
6940 Tremont Rd.
Dixon, CA 95620
(707) 693-2929
fax (707) 693-2922

*Sub
1038*

Fax

To: Amir Gholami **From:** Christine Truesdale

Fax: (510) 337-8335 **Pages (including this one):**

Phone: **Date:** July 6, 2001

Re: Himalaya Trading Company 2951 High Street, Oakland

Urgent Informational Please Comment Please Reply Please Recycle

• Comments:

Dear Mr. Gholami:

We received the corrected version of your letter to Mr. Kandahari, thank you for making the correction.

I have just one more request regarding your letter. The letter's subject line still refers to Zima Center Corporation instead of Himalaya Trading Company at 2951 High Street, Oakland, CA 94619. We don't need another copy of the letter—I just wanted to bring it to your attention for future letters.

Thank you again for making the first corrections.

Sincerely,

W.A. Craig, Inc.

Christine Truesdale

Christine Truesdale

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

Stid 3579

June 12, 2001
Mr. Joseph A. Aldridge, RG
Senior Project Manager
Retail Environmental Services
Ultramar, Inc.
525 West Third Street
Hanford, CA 93230

Re: Former Beacon Station at 22315 Redwood Road, Castro Valley, CA

Dear Mr. Aldridge:

I am in receipt of the "Status Report First Quarter 2000" prepared by Mr. Richard E. Johnson of BSK & Associates, Geotechnical Consultants, Inc. dated June 7, 2001 pertaining to the above referenced site.

Per this report MW-5 well was sampled and indicated <0.50 of all constituents similar to previous analysis. MW-6 well only indicated decrease in MTBE concentration at 130ppb. Please be advised that all the wells, which have historically been revealing low concentrations of contaminants, need not be sampled any longer unless otherwise advised by this office.

MW-1 and MW-2 are the wells with significant contaminants. MW-1 well revealed up to 56,000ppb TPHg, 7,000ppb Benzene, and 620ppb MTBE. This reveals an increase in TPHg while indicating a decrease in Benzene and MTBE concentration. MW-2 well revealed up to 33,000ppb TPHg, 5,200ppb Benzene, and 740ppb MTBE. This reflects an increase in TPHg and Benzene concentration and decrease in MTBE concentration.

Per figure 3 groundwater flow gradient is moving south southwesterly.

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

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Richard E. Johnson, BSK & Associates, Geotechnical Consultants, Inc.
3140 Gold Camp Drive, Suite 160, Rancho Cordova, CA 95670-6023
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Stid 3579

January 24, 2001
Mr. Joseph A. Aldridge, RG
Senior Project Manager
Retail Environmental Services
Ultramar, Inc.
525 West Third Street
Hanford, CA 93230

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

Re: Former Beacon Station at 22315 Redwood Road, Castro Valley, CA

Dear Mr. Aldridge:

This office is in receipt of the "Status Report Fourth Quarter 2000" prepared by Mr. Richard E. Johnson of BSK & Associates, Geotechnical Consultants, Inc. dated January 17, 2001 regarding the above referenced site.

MW-1, MW-2, MW-3, MW-4, MW-7, and MW-8 wells were not sampled. MW-5 well was sampled and indicated <0.50 of all constituents while MW-6 well only indicated MTBE concentration at 160ppb. All the wells, which have historically been revealing low concentrations of contaminants, need not be sampled any longer unless otherwise advised by this office.

Even though MW-1 and MW-2 wells were not sampled, they are more significant due to the presence of the contaminants in these wells recently. Per previous report MW-1 well revealed up to 49,000ppb TPHg, 8,000ppb Benzene, and 740ppb MTBE, while MW-2 revealed up to 21,000ppb TPHg, 34,00ppb Benzene, and 1000ppb MTBE. MW-6 well should also be monitored periodically due to the presence of MTBE presently at 160ppb according to this report.

Groundwater flow gradient is moving south southwesterly according to Figure 3 within this report.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Amir K. Gholami'.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Richard E. Johnson, BSK & Associates, Geotechnical Consultants, Inc.
3140 Gold Camp Drive, Suite 160, Rancho Cordova, CA 95670-6023
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Stid 3579

December 6, 2000
Mr. Joseph A. Aldridge, RG
Senior Project Manager
Retail Environmental Services
Ultramar, Inc.
525 West Third Street
Hanford, CA 93230

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

Re: Former Beacon Station at 22315 Redwood Road, Castro Valley, CA

Dear Mr. Aldridge:

This office is in receipt of the "Status Report Third Quarter 2000" prepared by Mr. Richard E. Johnson of BSK & Associates, Geotechnical Consultants, Inc. dated October 17, 2000 regarding the above referenced site.

According to this report MW-1 well revealed up to 49,000ppb TPHg, 8,000ppb Benzene, and 740ppb MTBE, while MW-2 revealed up to 21,000ppb TPHg, 34,00ppb Benzene, and 1000ppb MTBE. MW-3, MW-5, and MW-6 wells did not reveal much contaminants as in the past with the exception of MW-6, which revealed 170ppb MTBE.

MW-4 has not been sampled since 1996 and has historically contained low amount of contaminants as well.

Per figure 3 groundwater flow gradient is to south-southwesterly direction.

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

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Richard E. Johnson, BSK & Associates, Geotechnical Consultants, Inc.
3140 Gold Camp Drive, Suite 160, Rancho Cordova, CA 95670-6023
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Stid 3579

October 31, 2000
Mr. Joseph A. Aldridge, RG
Senior Project Manager
Retail Environmental Services
Ultramar, Inc.
525 West Third Street
Hanford, CA 93230

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

Re: Former Beacon Station at 22315 Redwood Road, Castro Valley, CA

Dear Mr. Aldridge:


I have been recently assigned to oversee the cleanup process at the above referenced site. I have received and reviewed the "Status Report Second Quarter 2000" prepared by Mr. Richard E. Johnson of BSK & Associates, Geotechnical Consultants, Inc. dated August 1, 2000 regarding the above referenced site. Per this report MW-1 through MW-4 were not sampled this period. However, on 3/16/2000 the MW-1 revealed up to 59,000ppb TPHg, 9,600ppb Benzene, and 730ppb MTBE, while MW-2 revealed up to 38,000ppb TPHg, 49,00ppb Benzene, and 870ppb MTBE. MW-3 and MW-4 on the other hand have not revealed much contaminant in the past. The low level of contaminants is also true for the other remaining wells as well with the exception of MW-6, which revealed 260ppb MTBE for the same period and 160ppb MTBE on 6/12/2000.

Groundwater flow gradient is to south-southwesterly direction.

I will be looking forward for the next quarterly monitoring report.

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

Sincerely,


Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Richard E. Johnson, BSK & Associates, Geotechnical Consultants, Inc. 3140
Gold Camp Drive, Suite 160, Rancho Cordova, CA 95670-6023
Files



California Regional Water Quality Control Board

San Francisco Bay Regional Water Quality Control Board



Winston H. Hickox
Secretary for
Environmental
Protection

Internet Address: <http://www.swrcb.ca.gov>
1515 Clay Street, Suite 1400, Oakland, California 94612
Phone (510) 622-2300 FAX (510) 622-2460

Gray Davis
Governor

TO: Amir Gholmi
Alameda County Environmental Health Agency

FROM: Roger Brewer, Chuck Headlee
Bay Area Regional Water Quality Control Board
Toxics Cleanup Division

DATE: August 8, 2000

SUBJECT: Review of Risk Assessment and Site Investigation Reports for Durham Transportation, 19984 Meekland Avenue, Hayward

Below are comments on the AGI September 25, 1998, and Weber, Hayes and Associates October 27, 1999, risk assessments and proposed cleanup levels for the Durham Transportation site at 19984 Meekland Avenue, Hayward. Please contact our office if you have any questions.

- 1. Conditional approval of proposed soil cleanup levels.** Based on my review of the combined AGI/Weber, Hayes and Associates risk assessments, the following soil cleanup levels have been proposed:

Chemical	Surface Soils (0-5.5' bgs)	Subsurface Soils (>5.5' bgs)
Benzene	-	0.118 mg/kg
Ethylbenzene	-	-
Toluene	-	150 mg/kg
Xylenes	-	-
1,2 DCA	0.032 mg/kg	0.032 mg/kg
PCE	0.49 mg/kg	0.49 mg/kg
TCE	0.17 mg/kg	0.17 mg/kg
TPH-Gasoline	-	1000 mg/kg
TPH-Diesel	-	1000 mg/kg

The proposed soil cleanup levels for benzene, 1,2 DCA, PCE and TCE are adequate for protection of human health through direct and indirect exposure. Although not specifically addressed in the risk assessments, the cleanup levels are also adequate for protection of groundwater quality (as a potential source of drinking water) due to potential leaching of chemicals from soil. The cleanup levels were originally developed for a commercial/industrial land use scenario. Based on a review of USEPA Region IX Preliminary Remediation Goals (October 1999) and in-house screening levels for protection of indoor air quality, the proposed soil cleanup levels for these chemicals are also adequately protective of potential, future residential use of the property. ~~The proposed cleanup level for benzene in subsurface soil should, however, also be applied to surface soils.~~ (If concentrations of benzene in surface soil are already below this level, additional cleanup is obviously not required.)

The proposed cleanup levels for toluene and TPH and the lack of cleanup levels for ethylbenzene and xylenes do not address the need to protect groundwater quality due to potential leaching of chemicals from soil. Soil cleanup criteria that address this concern should be developed and presented for review. As an alternative, a more stringent TPH cleanup level could be used (e.g., 100 mg/kg).

In accordance with the Basin Plan, shallow groundwater beneath the site should be considered a potential source of drinking water. Final [REDACTED] water

[REDACTED] of regulatory standards (e.g., 100 mg TPH)

2. **Initiate regular sampling of groundwater; define extent of groundwater impacted above cleanup goals to extent practical and needed.** As proposed by Weber, Hayes and Associates, groundwater should be sampled and tested on a quarterly basis unless otherwise approved. A sampling plan should be submitted for review. The sampling plan should describe the wells to be sampled. Samples should be tested for TPH and volatile organic compounds, including MTBE. Contoured maps depicting the extent of groundwater impacted above cleanup goals should be prepared.
3. **Conduct additional soil sampling between ground surface and water table; define extent of soil impacted above proposed cleanup standards; develop remedial action plan.** Additional soil sampling should be carried out in order to determine the extent of soil impacted above proposed cleanup levels. Note that this should be done for all chemicals detected at the site and not only for benzene as proposed by Weber, Hayes and Associates. Soil samples should be tested for TPH and volatile organic compounds, including MTBE. Maps and cross sections that depict the lateral and vertical extent of impacted soil should be prepared and presented.
4. **Evaluate need for additional remediation of impacted soil and groundwater at the site.** Continuing heavy impacts to shallow groundwater at the site suggest that additional removal of impacted soil is necessary. The need for active remediation of impacted groundwater in the source area should also be evaluated. The applicability of monitored natural attenuation should be evaluated with respect to the extent and magnitude of impacts, the proximity of downgradient wells and bodies of surface water, and the presence of vertical conduits that could cause impacts to deeper aquifers.

Ultramar

Ultramar, Inc.
P.O. Box 466
525 W. Third Street
Hanford, CA 93232-0466
(209) 582-0241

Telecopy: 209-585-5685 Credit
209-583-3330 Administrative
209-583-3302 Information Services
209-583-3358 Accounting

June 22, 1999

Mr. Scott Seery, CHMM
Hazardous Materials Specialist
Alameda County Health Care Services Agency,
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Oakland, CA 94502-6577

**SUBJECT: List of Record Fee Title Owners for
22315 Redwood Road, Castro Valley, California
Former Beacon Station #574**

Dear Mr. Seery:

The letter has been prepared as requested in your correspondence dated May 4, 1999. There was a delay in receiving the correspondence. Apparently, it came free of the original envelope during delivery. A copy of the United States Postal Service envelope and "Loose in The Mail" information card that we received with the correspondence on June 21, 1999, are attached.

The current owner of the above referenced property is:


Mr. Paul Wilson
1238 Stanyan Street
San Francisco, CA 94117

Ultramar has forward a copy of this letter, with your correspondence attached, to the property owner. Also, the property owner receives copies of all reports prepared for Ultramar, related to assessment and remedial actions, associated with the site.

Please call if any further action is necessary (559-583-3231).

Sincerely,

ULTRAMAR INC.


Joseph A. Aldridge, RG
Senior Project Manager
Retail Environmental Services

cc: Mr. Paul Wilson

99 JUN 25 PM 3:51

ENVIRONMENTAL PROTECTION



A Member of the Ultramar Group of Companies

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OAKLAND CA 94615-9751

Found Loose In the Mail
9928270466



Dear Postal Customer:

Please accept our apologies for the damage your mail received while in our care.

We process over 600 million pieces of mail daily, and consistently meet our goal of getting your mail to you as quickly as possible. On occasion, however, equipment failure or human error may prevent us from doing so. We appreciate your patience when this occurs.

If you are aware of any specific item becoming seperated from your mailing, please contact our Loose in The Mail Office at (510) 874-8420.

Please use this notice to explain any resulting delay or problem with your correspondence. If you need any assistance in this regard, please call our office at 1-800-275-8777.

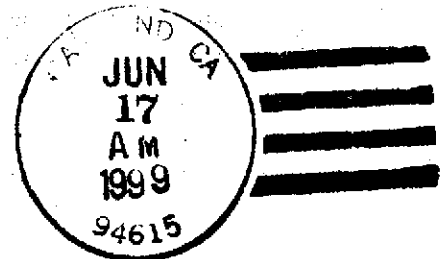
We look forward to providing you with better service in the future.

Sincerely,

ELMA RAMIREZ CONSUMER AFFAIRS MANAGER
UNITED STATES POSTAL SERVICE
OAKLAND DISTRICT
201 - 13TH STREET RM. 228
OAKLAND CA 94612-9805



**WE
CARE**



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

May 4, 1999

STID 3579

Mr. Joseph Aldridge
Ultramar Inc.
P.O. Box 466
Hanford, CA 93232-0466

RE: (Former) Beacon Station #574, 22315 Redwood Road, Castro Valley

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Aldridge:

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: 22315 Redwood Rd., Castro Valley

May 4, 1999

Page 2 of 2

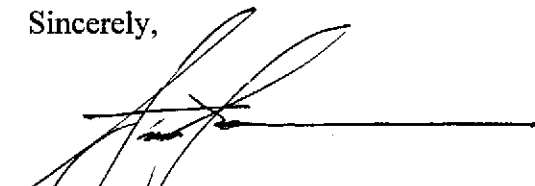
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 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
Paul A. Wilson, 1238 Stanyan St., San Francisco., CA 94117

SAMPLE LETTER (2): LIST OF LANDOWNERS FORM

Name of local agency
Street address
City

SUBJECT: CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR (*Site Name and Address*)

(Note: Fill out item 1 if there are multiple site landowners. If you are the sole site landowner, skip item 1 and fill out item 2.)

1. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (*name of primary responsible party*), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:

2. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (*name of primary responsible party*), certify that I am the sole landowner for the above site.

Sincerely,

Signature of primary responsible party

Name of primary responsible party

SAMPLE LETTER 3: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY

Name of local agency
Street address
City

SUBJECT: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY
FOR *(Site Name and Address)*

In accordance with section 25297,15(a) of Chapter 6.7 of the Health & Safety Code, I, *(name of primary responsible party)*, certify that I have notified all responsible landowners of the enclosed proposed action. Check space for applicable proposed action(s):

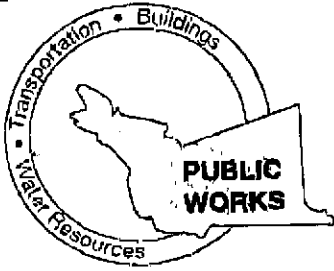
- cleanup proposal (corrective action plan)
- site closure proposal
- local agency intention to make a determination that no further action is required
- local agency intention to issue a closure letter

Sincerely,

Signature of primary responsible party

Name of primary responsible party

cc: Names and addresses of all record fee title owners



COUNTY OF ALAMEDA
PUBLIC WORKS AGENCY
399 Elmhurst Street • Hayward, CA 94544-1395
(510) 670-5480

August 31, 1998

Mr. Joe Aldridge
Ultramar, Inc.
P.O. Box 466
Hanford, CA 93232-0466

Subject: Monitoring Wells at 22315 Redwood Road, Castro Valley
(Formerly Beacon Service Station)

Dear Mr. Aldridge:

This letter is to recap our telephone conversation of August 27, 1998, regarding the destruction of monitoring wells MW-7 and MW-8 at the subject location. You confirmed that the work will be completed prior to October 1, 1998. The County's utility undergrounding project is scheduled to start October 5, 1998.

If you have any questions or need additional information, please do not hesitate to contact me at (510) 670-6270. Thank you very much for your cooperation.

Very truly yours,


Lorenzo King
Assistant Engineer

cc: Scott O. Scery, HCMM, ACHCSA

ALAMEDA COUNTY PUBLIC WORKS AGENCY FAX TRANSMITTAL

TO: Mr. Scott O. Seery	FROM: Lorenzo King
COMPANY: Alameda County Health Agency	DATE: August 31, 1998
FAX NUMBER: (510) 337-9335	TOTAL NO. OF PAGES INCLUDING COVER: 3
PHONE NUMBER: (510) 567-6783	SENDER'S FAX NUMBER: (510) 782-1939
RE: Monitoring Wells affected by The Improvements on Redwood Road	
<input type="checkbox"/> URGENT	<input type="checkbox"/> FOR REVIEW
<input type="checkbox"/> PLEASE REPLY	<input type="checkbox"/> PLEASE COMMENT
	<input type="checkbox"/> PLEASE RECYCLE

NOTES/COMMENTS:

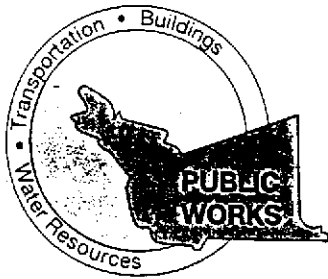
Scott,

This is for your file. My tie line is 56270 in case you need additional information.

Thank you very much.

399 ELMHURST STREET
HAYWARD, CALIFORNIA 94544-1395





COUNTY OF ALAMEDA
PUBLIC WORKS AGENCY
399 Elmhurst Street • Hayward, CA 94544-1395
(510) 670-5480

August 10, 1998

Ken Earnest
Ultramar, Inc.
P.O. Box 466
Hanford, CA 93232-0466

Attention: Mr. Joe Aldridge

Subject: Monitoring Wells at 22315 Redwood Road, Castro Valley
(Formerly Beacon Service Station)

Dear Mr. Earnest:

You are hereby requested to remove monitoring wells MW-7 and MW-8, as shown on the enclosed drawing before October 1, 1998. These wells need to be removed in accordance with the guidelines set by the Alameda County Health Care Services and the Alameda County Water and Conservation District - Zone 7 requirements. These wells are in conflict with the County's utility undergrounding project as well as the second phase of the widening and reconstruction of Redwood Road.

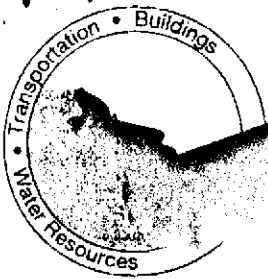
Upon field verification, monitoring wells MW-1 and MW-3 will not be in conflict with the above-mentioned construction projects, therefore will be left in place. The undergrounding of the utilities is scheduled to begin construction on October 1, 1998.

If you encounter difficulties meeting the October 1, 1998 deadline or have any additional questions, please contact me at (510) 670-6270 as soon as possible. Thank you very much for your cooperation.

Very truly yours,


Lorenzo King
Assistant Engineer

Enclosure
cc: Scott O. Seery, HCMM, ACHCSA



COUNTY OF ALAMEDA
PUBLIC WORKS AGENCY
399 Elmhurst Street • Hayward, CA 94544-1395
(510) 670-5480

RECEIVED

AUG 12 1998

August 10, 1998

Ken Earnest
Ultramar, Inc.
P.O. Box 466
Hanford, CA 93232-0466

Attention: Mr. Joe Aldridge

Subject: Monitoring Wells at 22315 Redwood Road, Castro Valley
(Formerly Beacon Service Station)


Dear Mr. Earnest:

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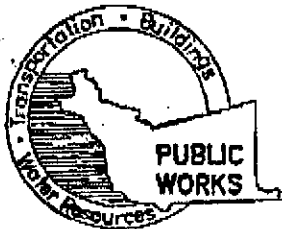
Upon field verification, monitoring wells MW-1 and MW-3 will not be in conflict with the above-mentioned construction projects, therefore will be left in place. The undergrounding of the utilities is scheduled to begin construction on October 1, 1998.

If you encounter difficulties meeting the October 1, 1998 deadline or have any additional questions, please contact me at (510) 670-6270 as soon as possible. Thank you very much for your cooperation.

Very truly yours,


Lorenzo King
Assistant Engineer

Enclosure
cc: Scott O. Seery, HCMM, ACHCSA



ALAMEDA COUNTY PUBLIC WORKS AGENCY

WATER RESOURCES SECTION

951 TURNER COURT, SUITE 300, HAYWARD, CA 94545-2651
 PHONE (510) 670-5575 ANDREAS GODFREY FAX (510) 670-5262
 (510) 670-5248 ALVIN KAN

DRILLING PERMIT APPLICATION

FOR APPLICANT TO COMPLETE

LOCATION OF PROJECT 22315 Redwood Rd
Castro Valley Ca

California Coordinates Source Accuracy # ft.
 NAD 83 NAD 27 UTM State Plane Other

CLIENT
 Name Ultramar Inc
 Address 525 Third St Phone 209 583-3445
 City Hanford Zip 93232

APPLICANT
 Name DOULOS Environmental Co
 Address 1537 Pine Valley Cir Phone 916 782 9054
 City Roseville Ca Zip 95661

TYPE OF PROJECT

Well Construction	<input type="checkbox"/>	Geotechnical Investigation	<input type="checkbox"/>
Cathodic Protection	<input type="checkbox"/>	General	<input type="checkbox"/>
Water Supply	<input type="checkbox"/>	Contamination	<input type="checkbox"/>
Monitoring	<input type="checkbox"/>	Well Destruction	<input checked="" type="checkbox"/>

PROPOSED WATER SUPPLY WELL USE

New Domestic	<input type="checkbox"/>	Replacement Domestic	<input type="checkbox"/>
Municipal	<input type="checkbox"/>	Irrigation	<input type="checkbox"/>
Industrial	<input type="checkbox"/>	Other	<input type="checkbox"/> <u>N/A</u>

DRILLING METHOD:

Mud Rotary	<input type="checkbox"/>	Air Rotary	<input type="checkbox"/>	Auger	<input type="checkbox"/>
Cable	<input type="checkbox"/>	Other	<input checked="" type="checkbox"/> <u>Pressure grout</u>		

DRILLER'S LICENSE NO. 730042

WELL PROJECTS

Drill Hole Diameter	<u>8</u> in.	Maximum Depth	<u>40</u> ft.
Casing Diameter	<u>2</u> in.	Number	<u>MW-7 + MW-8</u>
Surface Seal Depth	<u>20</u> ft.		

GEOTECHNICAL PROJECTS

Number of Borings	<u> </u>	Maximum Depth	<u>N/A</u> ft.
Hole Diameter	<u> </u> in.		

ESTIMATED STARTING DATE 9-16-98 9/29/98
 ESTIMATED COMPLETION DATE 9-16-98 9/29/98

I hereby agree to comply with all requirements of this permit and Alameda County Ordinance No. 73-68.

APPLICANT'S SIGNATURE Hal Hansen DATE 9-3-98

FOR OFFICE USE

PERMIT NUMBER 98WRA12
 WELL NUMBER MW-7 and MW-8
 APN

PERMIT CONDITIONS

Circled Permit Requirements Apply

- A. GENERAL**
 1. A permit application should be submitted so as to arrive at the ACPWA office five days prior to proposed starting date.
 2. Submit to ACPWA within 60 days after completion of permitted work the original Department of Water Resources Water Well Drillers Report or equivalent for well projects, or drilling logs and location sketch for geotechnical projects.
 3. Permit is void if project not begun within 90 days of approval date.
- B. WATER SUPPLY WELLS**
 1. Minimum surface seal thickness is two inches of cement grout placed by tremie.
 2. Minimum seal depth is 50 feet for municipal and industrial wells or 20 feet for domestic and irrigation wells unless a lesser depth is specially approved.
- C. GROUNDWATER MONITORING WELLS INCLUDING PIEZOMETERS**
 1. Minimum surface seal thickness is two inches of cement grout placed by tremie.
 2. Minimum seal depth for monitoring wells is the maximum depth practicable or 20 feet.
- D. GEOTECHNICAL**

Backfill bore hole with compacted cuttings or heavy bentonite and upper two feet with compacted material. In areas of known or suspected contamination, tremied cement grout shall be used in place of compacted cuttings.
- E. CATHODIC**

Fill hole above anode zone with concrete placed by tremie.
- F. WELL DESTRUCTION**

See attached.
- G. SPECIAL CONDITIONS**

APPROVED [Signature] DATE 9/24/98

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

July 23, 1998

STID 3579

Mr. Ken Earnest
Ultramar, Inc.
P.O. Box 466
Hanford, CA 93232-0466

RE: (former) Beacon Service Station #574, 22315 Redwood Road, Castro Valley

Dear Mr. Earnest:

I have recently taken over management of this project from Mr. Brian Oliva of this agency.

In correspondence dated May 28, 1997, this agency requested the submittal of a revised risk assessment following review of the December 21, 1996 El Dorado Environmental, Inc. document entitled "*Risk-Based Corrective Action Tier 1 and Tier 2 Analysis.*" The noted correspondence outlined ten areas where the requested revisions appeared justified. A copy of the May 28, 1997 correspondence is attached for your information.

I understand that Mr. Oliva has been in telephone contact with Mr. Joe Aldridge of your office on several occasions, the most recent of which was May 5, 1998. Mr. Oliva had been inquiring about the revised risk assessment, as well, and was assured a response. To date, no such revised risk assessment has been received.

Please submit the revised risk assessment within the next 30 days so that we may determine the status of this case and the next appropriate action.

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

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachment

cc: Mee Ling Tung, Director, Environmental Health
Chuck Headlee, RWQCB
Dave Deaner, SWRCB UST Fund
Dale van Dam, El Dorado Environmental, Inc.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



July 23, 1998

STID 3579

Mr. Ken Earnest
Ultramar, Inc.
P.O. Box 466
Hanford, CA 93232-0466

ENVIRONMENTAL HEALTH SERVICES

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

RE: (Former) Beacon Service Station #574, 22315 Redwood Road, Castro Valley

Dear Mr. Earnest:

The Alameda County Public Works Agency (ACPWA) has been implementing a widening and reconstruction project on Redwood Road and "A" Street, between Castro Valley Boulevard and the Hayward city limit. The initial phase of this three-phase construction project began in 1996 at the Redwood Road/Castro Valley Boulevard intersection.

The next phase of the project will be in and around the Grove Way/Redwood Road intersection and will encroach onto the subject site. Three of the site monitoring wells (MW-7, MW-8, and, perhaps, MW-3) are located within the reconstruction area and will be destroyed in the process. A map is attached showing these locations.

Under these circumstances, this agency approves the destruction of these wells. One or more of the wells may require replacement once the road project has been completed. These details may be worked out at a later date.

ACPWA has requested that you be informed of this issue. Please coordinate with ACPWA to ensure these wells are properly destroyed under permit before October 1, 1998. Please contact Mr. Lorenzo King of ACPWA at (510) 670-6270 to facilitate this effort.

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

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachment

cc: Mee Ling Tung, Director, Environmental Health
Lorenzo King, Alameda County Public Works Agency

WELLS IMPACTED BY "REDWOOD RD. PROJECT"



Former Beacon Station
22315 Redwood Road

Grove Way

Dispenser Islands
Former Tank
Excavation

MW-3

MW-1

MW-8

Proposed Expansion
Area

MW-7

Redwood Road

LEGEND

Monitoring Well

Proposed Boring
Location

Scale: 1" = 40'

Feet



Site Plan

22315 Redwood Road
Castro Valley, California

September 28, 1994

Drawn By: MCK

Project: 94-6163-1

Figure: 4

ACC Environmental Consultants • 1000 Atlantic Avenue, Suite 110 • Alameda, CA 94501 • (510) 522-8188 Fax: (510) 865-5731

WELLS IMPACTED BY "REDWOOD RD. PROJECT"



Former Beacon Station
22315 Redwood Road

Grove Way

Dispenser Islands
Former Tank
Excavation

MW-3

MW-1

Proposed Expansion
Area

MW-7

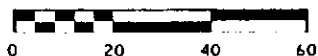
MW-8

LEGEND

Monitoring Well

Proposed Boring
Location

Scale: 1" = 40'
Feet



Redwood Road

Site Plan

22315 Redwood Road
Castro Valley, California

September 28, 1994

Drawn By: MCK

Project: 94-6163-1

Figure: 4

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Std 3579/lop

May 28, 1997

Attn: Kenneth Earnest
Ultramar, Inc.
PO Box 466
Hanford CA 93232-0466

ENVIRONMENTAL HEALTH SERVICES

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

Subject: Former Beacon Station #574, 22315 Redwood Road, Castro Valley, Alameda County, CA

Dear Mr. Earnest:

This office has completed a review of El Dorado Environmental, Inc.'s (EDE) *Risk-Based Corrective Action Tier 1 and Tier 2 Analysis*, dated December 21, 1996, regarding the subject site. **The following comments should be addressed and incorporated into a revised risk assessment:**

1. Representative contaminant concentrations in soil at the site should include analytical results of soil sampled from the former UST pit. Initial soil samples collected from the UST identified up to 89 ppm benzene. The average benzene concentration was calculated to be 3.2% of the Total Volatile Hydrocarbons (TVH) detected in the initial soil samples collected from the pit. Subsequent to overexcavation of accessible soil contamination, confirmatory soil samples were collected at the limits of the excavation and analyzed for TVH only. Up to 1989 ppm TVH was detected in the confirmation samples. The expected benzene concentration in this sample is 63.7ppm (1989 ppm TVH x 3.2% benzene = 63.6 ppm benzene) which is the concentration to be used in the risk assessment.

The contaminant concentrations in soil used in the El Dorado's risk assessment was based on the average concentrations from borings of MW-1, MW-2, MW-3, and MW-4. Instead, the contaminant concentrations in soil could be based on a 95% upper confidence limit (UCL) of the average concentration of the soil results obtained from the tank pit.
2. Include the surficial soil pathway (i.e., all contaminant concentrations detected in soil above five feet) to account for construction worker exposure to soil in the Tier-2 analysis.
3. EDE's risk assessment uses a maximum benzene groundwater concentration of 3,200 ppb. The highest benzene concentration detected in the groundwater at this site in the last four quarters of sampling was 7,000 ppb and based on historical groundwater analytical results to date, there is no evidence of attenuation of benzene concentrations in groundwater at this site. Therefore, average contaminant concentrations in groundwater over the last four quarters of sampling should be used for all wells. Then, an average of the average concentration of contaminants from the wells should be determined based on the site use and current building locations. For example, the contaminant concentration to evaluate risk to workers in the taco stand could be determined by calculating the average of the average concentrations of

Earnest/Ultramar
Re: 22315 Redwood Rd
May 28, 1997
Page 2 of 3

groundwater samples collected from monitoring wells MW-1 and MW-7 over the last four quarters of sampling. Risk from exposure to contaminants in soil and/or groundwater should also be evaluated in this manner for other receptor locations, such as, the apartment buildings, the retail stores, and the Department of Public Works.

4. Provide cleanup levels in the Tier-1 evaluation. Exposure scenarios evaluated in the Tier-1 assessment that exceed the allowable risk must be evaluated in the Tier-2 analysis. Please revise the Tier-2 work sheets to include all scenarios which fail a Tier-1 evaluation.
5. The output tables for the Tier-1 and Tier-2 evaluations provided in the report appear to be the same. Please provide the appropriate work sheets showing the different parameters used.
6. Indicate in the text of the report whether 10^{-5} or 10^{-6} risk is used for all exposure scenarios for commercial and residential. Define the class of carcinogen in output tables 9.1 to 9.3.
7. Sections 5.4 (Tier 2 SSTLs and Screening Results) and 6.0 (Conclusions and Recommendations) of EDE's report must be revised to include the information requested above. In addition, Section 5.4 should include a clear presentation and discussion of all exposure pathways evaluated in the appended work sheets as it pertains to the site. Providing a table of results that compares all pertinent exposure pathways and scenarios (i.e. residential or commercial), contaminant concentrations in soil and/or groundwater, cleanup levels, and calculated risk within the text would help make this section more clear.

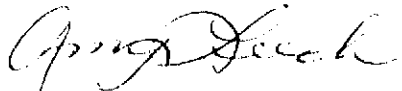
Section 6.0 should include a discussion regarding how this site meets the San Francisco Bay Regional Water Quality Control Board's definition of a Low Risk Groundwater Case. With the exception of MTBE, it appears the groundwater plume is stable at this site. However, contaminant concentrations within the plume do not appear to be "constant or decreasing" as indicated in Section 6.0. Rather, **benzene concentrations during the last four quarters of sampling were detected at some of the highest concentrations since monitoring began in 1992.**

8. Methyl Tertiary Butyl Ether (MTBE) has been identified at this site and the extent of MTBE has not been defined in the downgradient monitoring wells. The extent of the MTBE plume should be evaluated. This can be done by field investigations and/or the calculation of a dilution factor based on distance using fate and transport models.
9. Indicate property boundaries on the site map(s) in the report.
10. Please note that the recording of a deed restriction may be required as part of the closure process for this site.

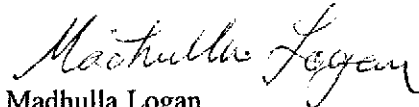
Earnest/Ultramar
Re: 22315 Redwood Rd
May 28, 1997
Page 3 of 3

Please call me at (510)567-6755 if you have questions or would like to schedule a meeting to discuss these issues.

Sincerely,



Amy Leech
Hazardous Materials Specialist



Madhulla Logan
Hazardous Materials Specialist

c: Attn: Dale A. van Dam, El Dorado Environmental, Inc., 2221 Goldorado Trail, El Dorado CA 95623
ALL-file

El Dorado Environmental, Inc.

2221 Goldorado Trail, El Dorado, California 95623

(916) 626-3898
Fax (916) 626-3899

FAX TRANSMISSION COVER SHEET

Date: 11/17/96
 To: Ms. Amy Leach, Alameda Co.
 FAX Number: 510/337-9335
 Subject: Request to review DWR records, Reason #574
 Sender: Dale A. van Dam

You should receive ² ~~1~~ page(s), including this cover sheet. If you do not receive all the pages, please call 916/626-3898.

Ms. Leach:

Please sign the attached form and return it to:

Mr. Jim Gibboney

DWR

3251 S Street

Sacto, CA 95816-7017

Please FAX it first to Mr. Gibboney at:

(916) 227-7600

My RBCA assessment for this site is on hold pending review of DWR records. Your assistance is appreciated. Call w/ questions

-Dale van Dam

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
042	227 7500	11-19 11:05	00' 41	01/01	OK		

7499402045

11/17/1996 16:51

9166263899

EL DORADO ENV INC

PAGE 02

CENTRAL DISTRICT

ID: 227-7500

NOV 15 '96 16:53 No. 010 P. 07

State of California
Department of Water Resources
Central District
3251 S Street
Sacramento, CA 95816-7017

**WELL DRILLER'S REPORTS
INSPECTION REQUEST AND AGREEMENT**

Project: Former Reson Station #574
Location: 22315 Redwood Road, Castro Valley, CA
County: Alameda Contract Number: Std 3579/06

Request is made pursuant to Section 13751 of the California Water Code for permission to inspect or copy Water Well Driller's Reports which are on file in your office.

In accordance with the requirements of Section 13752 of the Water Code, it is stipulated and agreed that such reports, or any copy or copies made thereof, will not be made available for inspection by the public but will be used solely by this governmental agency for making studies. If copies are made or taken, each copy will be stamped "CONFIDENTIAL" or "FOR OFFICIAL USE ONLY" and will be kept in a restricted file, access to which is limited to the staff of this governmental agency or to its contracted agents. Any copies furnished to contracted agents must be returned to the Department of Water Resources, Central District upon completion of work by the contracted agent.

No information contained in these reports can be disseminated or published without the written permission of the owner of the well.

El Dorado Environmental, Inc.
Contracted Agent

Alameda County Health Care Serv.
Governmental Agency

2221 Goldorado Trail
Address

1131 Harbor Bay Army #250
Address

El Dorado, CA 95613
City, State, & Zip Code

Alameda, CA 94502-6577
City, State, & Zip Code

By Dale A. [Signature]

By [Signature]

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

StId 3579/lop

August 29, 1996

Attn: Kenneth Earnest
Ultramar, Inc.
PO Box 466
Hanford CA 93232-0466

Subject: Former Beacon Station #574, 22315 Redwood Road, Castro Valley, Alameda County, CA

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

Dear Mr. Earnest:

Since our January 3, 1996, correspondence to you regarding the subject site, this office has completed a review of the case status and quarterly reports dated January 8, 1996; March 18, 1996; May 22, 1996; and July 29, 1996.

As you may already be aware, on January 5, 1996, the San Francisco Bay Regional Water Quality Control Board (RWQCB) issued a guidance document, *Interim Guidance on Required Cleanup at Low Risk Fuel Sites*. (See copy attached.) This document provides a definition of a "low risk groundwater case". If a site meets the criteria of this definition, then in most cases, passive bioremediation should be the preferred remedial alternative. Several criteria, however, must be met for a site to fit under the definition of "low risk", one being that an evaluation of risk has been made in regard to any present or potential human health or environmental exposures from soil or groundwater contamination left in place.

In our letter to you, dated January 13, 1995, this office concurred with ACTON · MICKELSON · van DAM, INC.'s (AMvD) remedial/corrective action plan for a passive bioremediation approach as proposed in their report, dated November 10, 1994. The implemented plan includes a groundwater sampling program to be maintained over time to monitor plume stability and natural attenuation in lieu of any "active" remediation strategies. This corrective action approach was reported to be the most cost-effective and viable alternative since it appears that the contaminant plume is not migrating at this site.

In light of the RWQCB interim guidance and the elevated levels of soil and groundwater contamination left in place at this site, **please submit an addendum to the AMvD report by November 1, 1996**, that includes an evaluation of risk to human health and the environment from exposure to the contamination to soil and groundwater left in place. This evaluation can be completed using the ASTM ES 1739-95 Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites (RBCA). The ASTM guide should be used to assist in establishing cleanup levels based on a risk analysis and to determine if a passive bioremediation approach is appropriate for this site. Please bear in mind that California maximum contaminant levels (MCLs) and slope factors, among other elements, are to be employed when performing this risk evaluation.

Earnest/Ultramar
Re: 22315 Redwood Rd
Page 2 of 2
August 29, 1996

Please note that the review of environmental assessment/investigations for the subject site has been transferred from Scott Seery to the undersigned of this office. Should you have questions, please contact me at (510)567-6755 and submit all reports to my attention. Thank you for your attention with this matter.

Sincerely,



Amy Leech
Hazardous Materials Specialist

ATTACHMENT

c: Kevin Graves, SFRWQCB
Gordon Coleman - File(ALL)



January 5, 1996

MEMORANDUM**To: San Francisco Bay Area Agencies Overseeing UST Cleanup and Other Interested Parties****Subject: Regional Board Supplemental Instructions to State Water Board December 8, 1995,
Interim Guidance on Required Cleanup at Low-Risk Fuel Sites**

These supplemental instructions are intended for the regulatory and technical audience¹ to expand on the interim guidance provided in the December 8, 1995, letter from Walt Pettit, Executive Director of the State Water Resources Control Board regarding the findings of the report entitled "Recommendations to Improve the Cleanup Process for California's Leaking Underground Fuel Tanks (LUFTs)" issued by the Lawrence Livermore National Laboratory (LLNL). Mr. Pettit's letter urges cleanup agencies to proceed aggressively to close low risk soil only cases and not to require active remediation of low risk groundwater cases.

The LLNL report indicates that bioremediation of petroleum is an important factor in stabilizing plumes and may be the only remedial activity necessary in the absence of free product. After a review of existing literature, white papers submitted to the SB1764 committee, and an extensive study of leak cases statewide, the LLNL report found that petroleum plumes tend to stabilize close to the source, generally occur in shallow groundwater and rarely impact drinking water wells in the state.

It is in light of these findings and the "lessons learned" over the past ten years in San Francisco Bay Region that these supplemental instructions are written. Strategies are presented for closing low risk soil only cases and managing low risk groundwater impact cases utilizing natural bioremediation as the preferred remedial alternative.

These two classes of sites, low risk soils and low risk groundwater, are not intended to include the whole universe of petroleum leaks. There are higher risk sites that may require immediate action and remediation to protect human health and the environment. The responsibility still lies with the discharger for investigation of the subsurface to gather the data necessary to make these decisions. It is the responsibility of the regulator to only request that information which is required to make the necessary regulatory decisions regarding the site.

It is the responsibility of everyone in the process, particularly consultants and regulators, to keep up with current research on site investigation, fate and transport of contaminants, analytical methods, and other topics that affect the decision making process. Training and education should be a high priority for all parties participating in the site cleanup process. The State and Regional Boards will be providing training to the local agencies and others affected. In addition, consulting by the Regional Board's toxicologist, Dr. Ravi Arulanantham, is available on a limited basis to local agencies.

¹ Additional supplemental information is also provided from the Regional Board in the form of a Fact Sheet in a "Question and Answer" format.

LOW RISK SOILS CASE

Definition:

- 1) The leak has been stopped and ongoing sources, including free product, removed or remediated.**

The tank or appurtenant structure that leaked must be repaired or permanently closed per Chapter 7, Section 2672 of the UST regulations. Free product shall be removed to the extent practicable per Chapter 5, Section 2655 of the UST regulations.

Free product or soil which contains sufficient mobile constituents (leachate, vapors, or gravity flow) to degrade groundwater quality above water quality objectives or result in a significant threat to human health or the environment should be considered a source.

For old releases, the absence of current groundwater impact is often a good indication that residual concentrations present in the soil are not a source of pollution. In general, if impacted soil is not in contact, or expected to come in contact, with or very close to the groundwater, it is unlikely that it is a significant source of pollution.

- 2) The site has been adequately characterized.**

The extent of the subsurface impact should be defined to the degree that is necessary to determine if the site poses a threat to human health, the environment, or other sensitive nearby receptors. The level of detail required at a given site will depend upon the presence or absence of potential receptors and exposure pathways. Delineating plumes to non-detect levels is not required at all sites.

It is assumed that subsurface conditions are highly variable and that there is always some uncertainty associated with evaluating data at a site. However, the cost of obtaining additional data must be weighed against the benefit of obtaining that data and the effect the data may have on the certainty of decisions to be made at the site.

- 3) Little or no groundwater impact currently exists and no contaminants are found at levels above established MCLs or other applicable water quality objectives.**

By definition, soils only cases do not have significant groundwater impacts.

- 4) No water wells, deeper drinking water aquifers, surface water, or other sensitive receptors are likely to be impacted.**

- 5) The site presents no significant risk to human health.**

The American Society of Testing and Materials' (ASTM) standard for Risked Based Corrective Action (RBCA), ASTM E-1739-95, details a framework and provides a methodology to perform a tiered risk analysis at petroleum release sites. This methodology incorporates EPA risk assessment practices to determine non-site specific (tier 1 look up table which provides generic risk based screening levels) and site specific (tier 2 and tier 3) clean up levels that are protective of public health and environmental resources.

LOW RISK GROUNDWATER CASE

Definition

- 1) The leak has been stopped and ongoing sources, including free product, have been removed or remediated (see Low Risk Soils Case Definition #1).**
- 2) The site has been adequately characterized (see Low Risk Soils Case Definition #2).**

The presence or absence of horizontal and vertical conduits which could act as preferential pathways for the dissolved plume should be evaluated as a part of the site characterization process.

- 3) The dissolved hydrocarbon plume is not migrating.**
The LLNL report found that petroleum plumes in the subsurface tend to stabilize once the source is removed. Natural biodegradation of hydrocarbons is the main reason why this stability occurs.

Chemical concentrations of hydrocarbons in groundwater that decrease or do not change with time are the best indicators of a stable plume. Comparison of background and hydrocarbon plume concentrations of inorganic ions such as oxygen, iron, nitrate, sulfate, and others, can provide evidence of biodegradation at a given site. These data may not be required to determine plume stability but can supplement other lines of evidence.

Stable or decreasing plumes often display short term variability in groundwater concentrations. These effects are due to changes in groundwater flow, degradation rates, sampling procedures, and other factors which are inherently variable. This behavior should not necessarily be construed as evidence of an unstable plume but may be the natural variations of a stable plume in the environment.

- 4) No water wells, deeper drinking water aquifers, surface water, or other sensitive receptors are likely to be impacted.**
- 5) The site presents no significant risk to human health.**

For this analysis, the groundwater ingestion pathway need not be considered if the groundwater is not currently used as a source of drinking water or projected to be used within the life of the plume. (See Low Risk Soils Case Definition #5)

- 6) The site presents no significant risk to the environment.**

RBCA has no specific guidance for evaluating environmental risk although the basic framework is appropriate if site specific exposure pathways and ecological receptors are included. If the site has a potential to significantly impact surface water, wetlands, other sensitive receptors, it should not be considered low risk. (See Low Risk Soils Case Definition #6)

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

2101 WEBSTER STREET, Suite 500
 OAKLAND, CA 94612
 Tel: (510) 286-1255
 FAX: (510) 286-1380
 BBS: (510) 286-0404



Fact Sheet Questions and Answers on the

"Interim Guidance on Low-Risk Petroleum Hydrocarbon Cleanups"

Lawrence Livermore National Laboratory (LLNL) issued its "Recommendations to Improve the Cleanup Process for California's Leaking Underground Fuel Tanks" (October 16, 1995). In response to this report, State Water Resources Control Board Executive Director Walt Pettit issued an interim guidance letter dated December 8, 1995, which discussed the regulatory implications of the conclusions and recommendations of the LLNL report.

From the December 8, 1995, letter:

"In the interim and in light of the findings and recommendations in the LLNL report, we believe cleanup oversight agencies should proceed aggressively to close low risk soil only cases. For cases affecting low risk groundwater (for instance, shallow groundwater

with maximum depth to water less than 50 feet and no drinking water wells screened in the shallow groundwater zone within 250 feet of the leak) we recommend that active remediation be replaced with monitoring to determine if the fuel leak plume is stable. Obviously good judgment is required in all of these decisions. However, that judgment should now include knowledge provided by the LLNL report."

This Fact Sheet is intended to further amplify the guidance contained in the State Board letter for fuel cleanup sites within the San Francisco Bay Region through the form of "Answers" to frequently asked questions regarding implementation of the new petroleum cleanup interim guidance.

Q What is considered a "source" when completing source removal?

A Leaking tanks and appurtenant structures must be removed or repaired. Free product or soil which contains sufficient mobile constituents (leachate, vapors, or gravity flow) to degrade groundwater quality above water quality objectives or provide a significant threat to human health or the environment should be considered a source.

Gasoline or diesel free product fits this definition at virtually all sites. Oil and grease, degraded crude oil, and degraded diesel may not be soluble enough to be considered a significant source and often do not degrade water quality or present a significant risk to human health or the environment.

Many factors need to be considered when determining if a given petroleum release constitutes a source.

- Depth of the affected soil below ground surface
- Depth to groundwater below ground surface
- Soil type and physical properties
- Presence of preferential pathways (ie. old wells, utility trenches, etc.)
- Type of petroleum released
- Infiltration rate
- Spatial distribution of petroleum concentrations
- Total mass of petroleum released
- Trends in monitoring data
- Chemical and physical properties of any residual hydrocarbons

Good judgment must be used when weighing these and other factors. For old releases, the absence of current groundwater degradation often is a good indication that residual concentrations present in the soil are not a source of pollution. In general, if impacted soil is not in contact or

expected to come in contact with the groundwater, it is unlikely that it is a significant source of pollution.

Q What is meant by "low risk groundwater sites"?

A An example of a low risk groundwater site is described in the State Board letter as a site with maximum depth to groundwater less than 50 feet and no drinking water wells screened in the shallow groundwater zone within 250 feet of the leak. In addition, there should be no surface water or other sensitive habitat that may be adversely impacted by the release.

These criteria are not hard and fast rules. They are meant to recognize that shallow groundwater is rarely used as a drinking water source, that biodegradation in most cases will stabilize a plume within 250 feet of the leak, and that the plume will likely remediate itself due to natural biodegradation. However, if the plume is not stable, preferential pathways exist at the site, or sensitive receptors are near the end of the plume, then the site should not be considered low risk.

Q How do we determine if there is a significant risk to human health at a site?

A The American Society of Testing and Materials (ASTM) standard for Risk Based Corrective Action, ASTM E-1739-95, (RBCA) provides look up tables for various exposure pathways that contains conservative screening levels (when modified for California's benzene standard) for comparison with values existing at the site. The standard also contains a methodology for determining site specific levels that are protective of public health and the environment. The SWRCB/RWQCB is now offering two day classes for all interested parties in risk-based decision making at soil and groundwater impacted sites. Please contact the UC

Q Can existing active remediation systems at low risk sites be turned off even though established remedial goals have not been reached?

A Yes. If the site is evaluated using the new guidance and active remediation is not indicated, then active treatment at the site should be terminated. If the extraction system is necessary to provide hydraulic control of the plume which prevents contaminants from reaching a sensitive receptor, then continued pumping may be warranted.

Q When can adjacent site data be used in lieu of site specific data?

A Local hydrogeologic data can often be inferred from data collected at adjacent sites. Depth to groundwater, depth to regional aquifer, groundwater gradient, soil types that may be present, and chemical concentrations may all be of value in directing an investigation. A conceptual model of the site may be formed using local or adjacent site data. Data collected during a site investigation should clarify the conceptual model and help to guide any further work at the site.

Q If a site is only monitoring and no active remediation is anticipated, can the site be closed?

A Regulatory agencies have broad discretion to determine whether or not regulatory action is necessary and appropriate at a given site. Under current policies, the monitoring period could be many years depending upon the magnitude of the release, remedial actions taken, and biodegradation rates at the site. Closure of low risk UST sites would be appropriate as soon as enough data supported the conclusion that the source had been removed, the plume had stabilized, and bioremediation was expected to achieve water quality objectives (e.g. MCLs) in a reasonable time.

The State Board has indicated that policies regarding petroleum cleanup standards will be reviewed in 1996 pursuant to SB1764 requirements. Changes in closure policy regarding low risk groundwater cases may be a result of that review.

Q What action should be taken if a responsible party refuses to take any action at a site and cites this guidance as the reason for inaction?

A Responsible parties are required to comply with all regulatory requirements. If they disagree with a directive or think it is in violation of current regulatory practice, they have the opportunity to appeal that directive through the proper channels. Responsible parties may face enforcement actions if they disregard regulatory requirements and do not appeal using the appropriate procedures.

Q If a responsible party wants to pursue a more aggressive remedial strategy than stated in the State Board letter, will the Cleanup Fund pay for the additional remediation?

A The Cleanup Fund manager has indicated that the Fund will only reimburse costs for those activities that are required by regulatory agencies. For low risk cases, regulatory agencies should not approve work plans for active remediation unless adequate justification is provided. Article 11, section 2727f of the Underground Storage Tank Regulations requires that responsible parties propose the most cost-effective corrective action. This will be monitoring, without active remediation, in many cases.

Q What public notification is required when implementing this guidance?

A The implementation of the LLNL recommendations suggested by the State Board letter does not change the public notification requirements already stated in the UST regulations in Chapter 11, Section 2728. That section requires that the public must be informed of the proposed activities contained in a site's corrective action plan. If a site's corrective action plan is modified to the extent that it is essentially a new corrective action plan, then it may be appropriate for the public to be notified of the new plan.

Q Will future use of an impacted property be restricted by implementation of State Boards' recommendations?

A No change in current practice is expected. Generally, sites are remediated to either residential or commercial/industrial requirements based on current and projected future land uses. If a site is cleaned up to commercial/industrial standards and the land use changes to residential, then further risk assessment and possibly mitigation or remediation may be required.

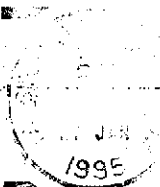
The current UST "no further action" letter requires that the implementing agency be notified if a change in land use occurs.

Q How does this guidance fit with existing and future policy?

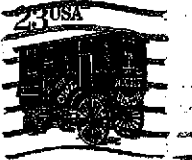
A From the December 8, 1995 letter, "What I propose to you is not in any way inconsistent with existing policies or regulations. However, it does represent a major departure from how we have viewed the threat from leak USTs." Under the requirements of SB 1764 the legislature expects the State Water Resources Control Board to propose and make further permanent changes to the interim guidance, perhaps as early this spring. Meanwhile, the Regional Board and the local regulating agencies will be implementing the interim guidance.

For further information or questions, please contact the Regional Board. Initial contact should be Wil Bruhns, the Regional Board's Ombudsman at 510-286-0838. He can give you further general information and direct your questions to the appropriate staff persons. It should be noted that most fuel cleanup sites in the Bay Area are regulated by local agencies.

Frederick W. Reyland, Jr.
3737 St. Andrews Drive
Stockton, CA 95219-1869



Lanah Weston 1890s



Mr. Scott O. Seery CHMM
Senior Hazardous Materials Specialist
Alameda County - Env. Health Dept
1131 Harbor Bay Parkway #250
Alameda CA 94502-6577

CHANGE OF ADDRESS

Beginning January 1, 1994

ALSO
HAZMAT
95 JAN 31 AM 9:59

FREDERICK W. REYLAND, JR.
3737 St. Andrews Drive
Stockton, California 95219-1869
Telephone (209) 956-2172

Re: Former Beacon Station #574
22315 Redwood Road, Castro Valley, Alameda County

1/15/96 - Review of QMR 12/96 + RBCA T1+T2
Analysis 12/96.

#3579

→ need to continue analyzing for MTBE -
next analysis should perform 8240

RBCA Analysis

- Append. E / Table 5 - missing lezene toxicity factor for Calif but included in analyses
- Need restriction for site: no wells. ^{v) text.}

Prepare ^{draft of} CLS to verify soil concentrations
& forward to on logs.

Draft letter to RP:

- Site needs to be assessed using ASTM/RBCA. Most likely a tier-2 analysis/assessment will need to be performed. ✓
 - ~~And reminder to include MTBE analysis. Seemed to ignore our 1/3/96 letter.~~
 - Complete QMR review
- OK

St Id 357

Beacon Station #574

22315 Redwood Rd, C.V.

* Ask RP to begin analyzing for MTBE.

Gasoline peak not typical of gas @ MW-6

is most likely MTBE. → USTs were removed in 1987.

* Let RP know report to go to Adtech

* Will MTBE data effect interpretation of ~~prop~~ sampling schedule?

- Note MW1-4 were not sampled during

2095 event - Why?

Per Scott's letter dated 1/13/95:

MW1 - MW3 - semiannually

MW5 - MW7 - quarterly

MW4 & MW8 - no sampling req. @ this time

- CAP was approved 1/13/95 which is use of "passive remediation" & reduction of GMR to SMR for MW1-MW3 etc. This was based on data to support on-site plume was stable in re. to TPHg & BTEX

note: Looking @ data "i" conc. have not attenuated during 3/92 → 6/95.

TPHg \leq 16,000 ppb & Benz. \leq 2,300 ppb during last 4 quarters.

A. Reports submitted to date

- cover date
- 8/28/91 ① July 15, 1991 Delta Environmental Consultants
- results of PSA

 - 5/20/92 ② May 4, 1992 Aegis Environmental, Inc. (AEI)
- 4th Quarter (Nov 1991) results (10-12) 5
due Feb 1

 - 6/25/92 ③ May 14, 1992 - (AEI)
- 1st quarter (March 1992) results (1-3) 3
due May 1 2

 - 10/1/92 ④ Sept 8, 1992 - AEI
- 2nd Quarter (June 1992) results (4-6) 4
due Aug 1

B. Reports are due the first day of the second month of the subsequent quarter.

C. Reference reporting schedule and need for additional assessment, on- and off-site, in Nov '91 letter

D. Article 11 CAP requirement: SWI, CAP, interim measures

Site ID#: 903 3579

Site Name: Beacon Station #574 (former) *
22315 Redwood Road
Castro Valley 94546

Responsible Parties:

Tank owner/operator

Ultramar Inc.

P.O. Box 466

525 W. Third Street

Hanford, CA 93232-0466

Property owner

Paul A. Wilson

1238 Stanyan St.

S.F., CA 94117

* Note: The station was razed in 1987, and all above- and below-ground improvements removed. The now is a small retail center on the property.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

StId 3579

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

January 3, 1996

Kenneth Earnest
Ultramar, Inc.
PO Box 466
Hanford CA 93232-0466

**Subject: Former Beacon Station #574, 22315 Redwood Road, Castro Valley,
Alameda County, CA**

Dear Mr. Earnest:

This office has recently reviewed Furgo West, Inc.'s Second Quarter 1995 Groundwater Monitoring Report dated August 29, 1995. Attached is a letter from the San Francisco Regional Water Quality Control Board dated May 2, 1995 which requires reporting of Methyl Tertiary Butyl Ether (MTBE) at all sites where a gasoline release occurred after 1983. **Please begin analyzing for MTBE at the subject site during the next groundwater sampling event.**

Please note that the review of environmental assessment/investigations for the subject site has been transferred from Scott Seery to the undersigned of this office. Should you have questions, please contact me at (510)567-6755 and submit all reports to my attention. Thank you for your attention with these matters.

Sincerely,

A handwritten signature in cursive script that reads "Amy Leech".

Amy Leech
Hazardous Materials Specialist

ATTACHMENT

c: Furgo West, Inc.
1050 Melody Ln Ste 160
Roseville CA 95678

Gordon Coleman - File(ALL)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

STID 3579

January 13, 1995

Mr. Kenneth Earnest
Ultramar, Inc.
P.O. Box 466
Hanford, CA 93232-0466

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

RE: FORMER BEACON STATION #574, 22315 REDWOOD ROAD, CASTRO
VALLEY, ALAMEDA COUNTY, CALIFORNIA

Dear Mr. Earnest:

As we discussed January 11, I have completed a review of the November 10, 1994 ACTON • MICKELSON • van DAM, INC. (AMvD) *Problem Assessment Report / Remedial Action Plan*. The "remedial action plan" proposed by AMvD in the cited document follows both a technical and cost-benefit evaluation of several remedial alternatives, several of which (e.g., soil vapor extraction, etc.) required comprehensive, on-site studies to facilitate appropriate evaluation. So called "passive remediation," the utilization of intrinsic bioremediation and other natural, contaminant attenuation mechanisms, has been selected by AMvD as the most cost-effective and viable alternative evaluated given site conditions.

Following consultation with the San Francisco Bay Regional Water Quality Control Board (RWQCB), this office concurs with this proposed remedial, or *corrective action*, plan. Agency concurrence is based on the belief that ground water data submitted to date strongly suggest that the contaminant plume is stable.

Please adhere to the following, alternative sampling schedule:

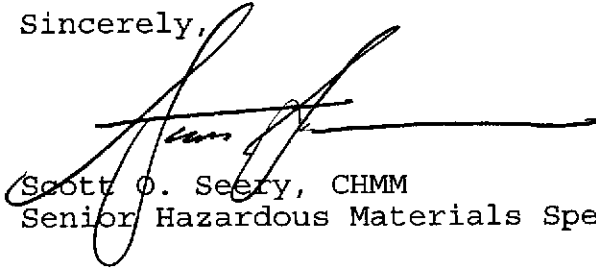
- o Wells MW-1, -2, and -3 are to be sampled **semiannually**
- o Wells MW-5, -6, and -7 are to be sampled **quarterly**
- o Wells MW-4 and -8 need not be sampled at this time

Please continue verification of ground water flow direction and gradient using elevation data from all wells, but following a reduced, **semiannual** schedule, at a minimum. After 3 years, or following noteworthy increases in contaminant concentrations in down-gradient, "guardian" wells, this schedule will be re-evaluated.

Mr. Kenneth Earnest
RE: 22315 Redwood Rd., Castro Valley
January 13, 1995
Page 2 of 2

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

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director
Gil Jensen, Alameda County District Attorney's Office
Kevin Graves, RWQCB
G. Robert Hale, Alameda County Public Works
Paul Wilson
Frederick Reyland, 3737 St. Andrews Dr.,
Stockton, CA 95219-1869

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

STID 3579

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

January 20, 1993

Mr. Kenneth Earnest
Ultramar, Inc.
P.O. Box 466
Hanford, CA 93232-0466

RE: 22315 REDWOOD ROAD, CASTRO VALLEY

Dear Mr. Earnest:

Thank you for the recent submittal of the January 11, 1993 soil and water investigation work plan, as submitted under Ultramar cover dated January 12, 1993. This work plan describes tasks associated with the further assessment of soil and water contamination from the referenced site. The work plan was reviewed in context with the State Water Resources Control Board Leaking Underground Fuel Tank (LUFT) Field Manual and Article 11 of Title 23, California Code of Regulations, among other technical and regulatory guidance documents.

The noted work plan has been accepted with the following additions:

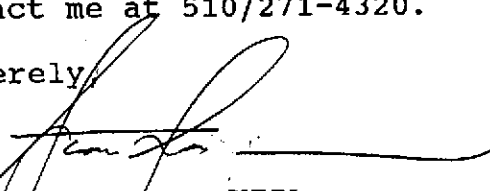
- 1) During boring advancement, samples should also be collected where field screening techniques identify zones of contamination, in addition to collecting samples at 5-foot intervals and changes in lithology, as proposed. All samples collected from such contaminated zones should also be analyzed for appropriate target compounds.
- 2) Please allow a minimum period of 24, and preferably 72, hours to pass between well development and the first purge/sampling sequence. Purging adequacy should also be based on the apparent stabilization of ambient ground water temperature, pH, and specific conductance, in addition to relative turbidity levels.
- 3) All new wells are to be surveyed relative to MSL, to the accuracy of 0.01 foot.
- 4) Please be certain that the Site Safety Plan adheres to the appropriate requirements as set forth under Part 1910.120 of 29CFR.

Mr. Kenneth Earnest
RE: 22315 Redwood Road, Castro Valley
January 20, 1993
Page 2 of 2

Please adhere to a schedule of quarterly sampling and ground water elevation monitoring at this time. Please also notify this office once a consultant has been selected, access agreements have been finalized, and work is scheduled to begin.

Should you have any questions or comments, please feel free to contact me at 510/271-4320.

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
Bob Bohman, Castro Valley Fire Department
Leslie Johnson, Esq., Miller, Starr & Regalia
Paul Wilson
Fredrick W. Reyland
G. Robert Hale, Alameda County Public Works
Ed Howell - files *EJH*

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

STID 3579

December 1, 1992

Mr. Kenneth Earnest
Ultramar Inc.
P.O. Box 466
Hanover, CA 93232-0241

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: FORMER BEACON STATION #574, 22315 REDWOOD ROAD, CASTRO
VALLEY, ALAMEDA COUNTY

Dear Mr. Earnest:

Thank you for meeting with me and Mr. Rich Hiatt of the San Francisco Bay RWQCB today to discuss the scope of future work at the referenced site. Please extend my appreciation to Mr. Dembroff, as well.

As we discussed, Ultramar will submit a soil and water investigation (SWI) work plan to this office for review. The SWI work plan, due by January 15, 1993, will briefly present the proposed project scope, including well locations, sampling protocol, and project intent, among other appropriate elements. Please be certain to provide this office with copies of any letters requesting encroachment or right-of-access to any of the adjoining properties affected by the SWI. Please also keep us apprised of your progress in securing such site access.

Should you have any questions, please feel free to call me at 510/271-4530, or -4320.

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 Hiatt, RWQCB
Bob Bohman, Castro Valley Fire Department
Leslie Johnson, Esq., Miller, Starr & Regalia
Paul Wilson
Frederick W. Reyland
G. Robert Hale, Alameda County Public Works
Ed Howell - files

Ultramar

Ultramar Inc.
P.O. Box 466
525 W. Third Street
Hanford, CA 93232-0466
(209) 582-0241

92 NOV 11 11 23 19
Telecopy: 209-584-6113 Credit & Wholesale
209-583-3330 Administrative
209-583-3302 Information Services
209-583-3358 Accounting

November 23, 1992

Mr. Scott O. Seery, CHMM
Senior Hazardous Materials Specialist
Alameda County Health Care Services
80 Swan Way, Room 200
Oakland, CA 94621

SUBJECT: FORMER BEACON STATION 574, 22315 REDWOOD ROAD, CASTRO VALLEY, CALIFORNIA

Dear Mr. Seery:

After reviewing your November 6, 1992 letter to Mr. Randall Stephenson of my office and reviewing with him, in detail, the above-referenced site's activity, we have decided to change the project management for the Castro Valley environmental project. The intent of this change is to get the project moving productively and try to avoid a future adversarial environment. We anticipate that Alameda County and Ultramar will now be able to discuss the project from a technical perspective only and avoid losing our objectivity.

Mr. Kenneth Earnest, a geologist and Environmental Specialist for Ultramar, has been assigned the project. Both he and I will be attending the December 1, 1992 meeting at your office. A representative for Aegis Environmental will also be attending. Randall and Kenneth are currently going over the facts related to the former Beacon and Chevron stations on Redwood Road.

Because of this management change, we do not anticipate having a written work plan in hand at the meeting. However, we too anticipate a productive meeting and will discuss proposed tasks for an additional study. After we have agreed on the concept of the additional work, we can prepare the required work plan in an expedient time frame agreeable to both parties.

In the spirit of cooperation, we will be attending the December 1 meeting without our Corporate Counsel present. We want this meeting to be technical in content and respectfully request that no Alameda County legal representative be present.



A Member of the Ultramar Group of Companies

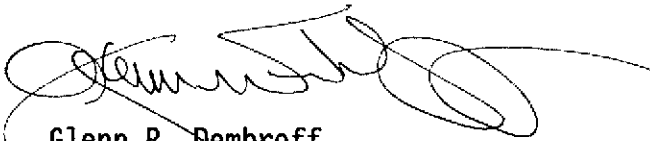
BEACON
#1 Quality and Service

Mr. Scott O. Seery - Alameda County
November 23, 1992
Page 2

If the above scenario is acceptable, we will see you on December 1. If there is a problem or concern, please call at 209-583-3374.

Sincerely,

ULTRAMAR INC.

A handwritten signature in black ink, appearing to read "Glenn R. Dembroff", written in a cursive style with a large loop at the end.

Glenn R. Dembroff
Manager
Marketing Environmental Department

cc: Randall Stephenson, Ultramar Inc.
Kenneth Earnest, Ultramar Inc.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director
STID 3579

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

November 6, 1992

Mr. Randall Stevenson
Ultramar Inc.
P.O. Box 466
525 West Third Street
Hanover, CA 93232-0241

RE: FORMER BEACON STATION #574, 22315 REDWOOD ROAD, CASTRO VALLEY, ALAMEDA COUNTY

Dear Mr. Stevenson:

This office has completed review of all reports issued to date documenting the current results of the environmental investigation at the referenced former Beacon station site. The most recent report, dated September 8, 1992, was written by Aegis Environmental, Inc. (AEI). This report presents the results of sampling and water elevation monitoring conducted concurrently by both AEI and Alton Geosciences during June 1992. Alton Geosciences is currently representing Chevron USA during the investigation of the neighboring former Chevron site located at 2416 Grove way, approximately 200 feet northeast of the subject Beacon facility. The September 8, 1992 AEI report was submitted under Ultramar cover dated October 1, 1992.

The cited AEI report confirms the results of past monitoring and sampling events at the subject Beacon site. **Severe** ground water contamination is most evident in the two wells appearing to be cross- and downgradient of the former fuel underground storage tanks (UST). However, benzene levels identified in all wells exceeds the MCL by up to three orders-of-magnitude, particularly in well MW-2 where such benzene levels are shown to be as high as 1,900 parts per million (ppb). These data are consistent with the results of the initial and subsequent sampling events, indicating clearly that the fuel hydrocarbon levels found in these wells are a result of an on-site release. Soil samples collected during boring advancement, and those collected at the time of UST closure, further corroborate these findings.

In correspondence from this office dated November 14, 1991, Ultramar was advised that further assessment of this unauthorized release was required. Ultramar was requested to submit a work plan, due **December 30, 1991**, for the installation of additional wells and borings designed to identify the vertical and lateral extent of both soil and ground water contamination associated with the release at this site. The cited letter also outlined well monitoring and sampling schedules Ultramar was to follow, and established the submittal dates for quarterly reports.

Mr. Randall Stevenson
RE: 22315 Redwood Road, Castro Valley
November 6, 1992
Page 2 of 4

An Ultramar letter dated January 6, 1992 requested an extension until February 7, 1992 for response to the cited November 14, 1991 letter from this office. This extension was requested in light of information reportedly received by Ultramar regarding the previously-mentioned former Chevron site. Such response was never received.

On March 3, 1992, I called you on the phone because, even though nearly a month had passed beyond the date of the requested extension (February 7), no response of any sort was received by this office. You indicated that Ultramar had not complied with the requested sampling schedule because "...[Ultramar] frankly [didn't] feel such a schedule was needed.." and that the Chevron station across the street hadn't evaluated the extent of their problem to your satisfaction. To date, no work plan for further assessment of the site has been submitted, the requested sampling/monitoring schedule has not been followed, and quarterly reports have not been submitted in a fashion consistent with the schedule outlined in the referenced November 14, 1991 correspondence from this office.

Be advised that Ultramar is currently in violation of the following sections of Chapter 16 of Title 23, California Code of Regulations (CCR):

Article 5

Section 26529(d) - Until the investigation and cleanup are complete, the owner or operator shall submit reports to the local agency every 3 months or at more frequent intervals, as specified by the local agency.

[Note: All quarterly reports have been submitted late. The 4th quarter 1991 report was submitted approximately 4 months late, a full 6 months after the completion of field work. Such untimely submittals are unacceptable.]

Article 11

Section 2721(a) - Responsible parties (RP) shall comply with the requirements of this article whenever there is any reportable unauthorized release.

Section 2722(b) - RP shall take or contract for interim remedial actions to abate or correct the actual or potential effects of an unauthorized release.

Mr. Randall Stevenson
RE: 22315 Redwood Road, Castro Valley
November 6, 1992
Page 3 of 4

Section 2722(c) - RP shall submit a work plan for corrective action to the local agency.

Section 2724 - RP shall conduct (soil and water) investigations of the unauthorized release, the release site, and the surrounding area possibly affected by the unauthorized release, if any of the following conditions exist:

- (1) There is evidence that....ground water has been or may be effected by the unauthorized release;
- (3) There is evidence that contaminated soils are or may be in contact with....ground water;
- (4) The regulatory agency requests an investigation, based on the actual or potential effects of contaminated soil or ground water on nearby....ground water resources or based on the increased risk of fire or explosion.

Section 2725(c) - RP shall submit a Corrective Action Plan (CAP) to the local agency for review and concurrence.

[Note: The CAP is based on the results of the soil and water investigation, and must include: 1) an assessment of impacts, 2) feasibility study, and 3) applicable cleanup levels.]

Please be advised that Health and Safety Code Section 25299(b) provides for civil penalties of up to \$5,000 per day per violation upon conviction of violations of the type noted above. Your attention is directed to the referenced sections of 23CCR and Health and Safety Code for more detailed information.

As discussed November 5 with Mr. John Giorgi of AEI, a meeting will be held at 11:00 A.M. on December 1, 1992 to discuss your case. The meeting will be held at the Alameda County Environmental Health Department, 80 Swan Way, Room 200, Oakland. I understand that you and an AEI representative will be present. As I indicated to Mr. Giorgi, we will expect that a soil and water investigation (SWI) work plan will be presented at this meeting. Should this occur, I look forward to a productive meeting.

Mr. Randall Stevenson
RE: 22315 Redwood Road, Castro Valley
November 6, 1992
Page 4 of 4

Please call me at 510/271-4530, or -4320, should you have any questions, or require directions to this office.

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 Hiatt, RWQCB
Bob Bohman, Castro Valley Fire Department
Leslie Johnson, Esq., Miller, Starr & Regalia
Paul Wilson
Frederick W. Reyland
Ed Howell - files

Ultramar

Ultramar Inc.
P.O. Box 466
525 W. Third Street
Hanford, CA 93232-0466
(209) 582-0241

98 007 - 7 - 111
Telecopy: 209-584-6113 Credit & Wholesale
209-583-3330 Administrative
209-583-3302 Information Services
209-583-3358 Accounting

October 1, 1992

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

SUBJECT BEACON SERVICE STATION NO. 574, 22315 REDWOOD ROAD, CASTRO VALLEY, CA

Dear Mr. Seary:

Enclosed for your review and files is a copy of our consultant's SECOND QUARTER MONITORING LETTER REPORT, JUNE 1992 for the above-referenced Ultramar facility.

Please do not hesitate to call if you have any questions regarding this information.

Sincerely,

ULTRAMAR INC.

Randall K. Stephenson
Randall K. Stephenson *R.S.*
Environmental Specialist II
Marketing Environmental

RKS/jj

Enclosure: Aegis report dated September 8, 1992

cc w/enc.: Mr. Rich Hiett
CRWQCB - San Francisco Bay Region
2101 Webster St Ste 500
Oakland CA 94612

Mr. Todd Pearson
Alton Geosceience
5870 Stoneridge Dr Ste 6
Pleasanton CA 94588



A Member of the Ultramar Group of Companies

BEACON
#1 Quality and Service

Ultramar

Ultramar Inc.
P.O. Box 466
525 W. Third Street
Hanford, CA 93232-0466
(209) 582-0241

92 APR -0 11 1:25

Telecopy: 209-584-6113 Credit & Wholesale
209-583-3330 Administrative
209-583-3302 Information Services
209-583-3358 Accounting

April 3, 1992

Mr. Scott Seery
Alameda County
Department of Environmental Health
Hazardous Materials Program
80 Swan Way
Oakland, California 94621

SUBJECT: FORMER BEACON SERVICE STATION SITE, NO. 574, 22315 REDWOOD ROAD, CASTRO VALLEY, CALIFORNIA

Dear Mr. Seery:

As per our telephone conversation last week, Ultramar Inc. will be performing additional ground-water sampling of the monitoring wells located at the above referenced site. Upon receipt of field and analytical data generated during this sampling event, an evaluation will be made regarding future work. All information obtained from the sampling will be provided to you under a cover letter.

Please contact me if you have any questions regarding this information.

Sincerely,

ULTRAMAR INC.



Randall K. Stephenson
Environmental Specialist II
Marketing Environmental Department

574-LTR3



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BEACON
#1 Quality and Service

WATER RESOURCES CONTROL BOARD
DIVISION OF WATER QUALITY - UST CLEANUP PROGRAM
SITE SPECIFIC QUARTERLY REPORT
01/01/92 THROUGH 03/31/92

AGENCY # : 10000 SOURCE OF FUNDS: F SUBSTANCE: 8006619
StID : 3579
SITE NAME: Beacon Station #574 DATE REPORTED : 08/28/87
ADDRESS : 22315 Redwood Rd. DATE CONFIRMED: 08/28/87
CITY/ZIP : Castro Valley 94546 MULTIPLE RPs : Y

SITE STATUS

CASE TYPE: G	CONTRACT STATUS: 2	EMERGENCY RESP:
RP SEARCH: S		DATE COMPLETED: 11/13/91
PRELIMINARY ASMNT: U	DATE UNDERWAY: 06/25/87	DATE COMPLETED:
REM INVESTIGATION:	DATE UNDERWAY:	DATE COMPLETED:
REMEDIAL ACTION:	DATE UNDERWAY:	DATE COMPLETED:
POST REMED ACT MON:	DATE UNDERWAY:	DATE COMPLETED:

ENFORCEMENT ACTION TYPE: 1 DATE ENFORCEMENT ACTION TAKEN: 11/13/91
LUFT FIELD MANUAL CONSID: 3HSCAWG
CASE CLOSED: DATE CASE CLOSED:
DATE EXCAVATION STARTED : 05/05/87 REMEDIAL ACTIONS TAKEN: NT

RESPONSIBLE PARTY INFORMATION

RP#1-CONTACT NAME: Paul A. Wilson
COMPANY NAME: Beacon Station #574
ADDRESS: 1238 Stanyan St.
CITY/STATE: San Francisco, Ca 94117

RP#2-CONTACT NAME:
COMPANY NAME: Ultramar Inc.
ADDRESS: P. O. Box 466, 525 W.-3rd
CITY/STATE: Hanford, Ca 93232-0466

WATER RESOURCES CONTROL BOARD
DIVISION OF WATER QUALITY - UST CLEANUP PROGRAM
SITE SPECIFIC QUARTERLY REPORT
AGENCY NO: 10000
10/15/91 THROUGH 01/15/92

SOURCE OF FUNDS: *F*

StID : 3579
SITE NAME: Beacon Station #574
ADDRESS : 22315 Redwood Rd.
CITY/ZIP : Castro Valley 94546
SUBSTANCE: 8006619

MULTIPLE RP's?: *Y*
DATE REPORTED: *8/28/87*
DATE CONFIRMED: *8/28/87*

SITE STATUS

CASE TYPE: <i>6</i>	CONTRACT STATUS: <i>2</i>	EMERGENCY RESP:
RP SEARCH: <i>S</i>	DATE UNDERWAY:	DATE COMPLETED: <i>11/13/91</i>
PRELIMINARY ASMNT: <i>u</i>	DATE UNDERWAY: <i>6/25/87</i>	DATE COMPLETED:
REM INVESTIGATION:	DATE UNDERWAY:	DATE COMPLETED:
REMEDIAL ACTION:	DATE UNDERWAY:	DATE COMPLETED:
POST RA MON:	DATE UNDERWAY:	DATE COMPLETED:

ENFORCEMENT ACTION TYPE : *1* DATE TAKEN: *11/13/91*
LUFT FIELD MANUAL CONSID: *3* *HSCAWG*
CASE CLOSED: DATE CLOSED:
DATE EXCAVATION STARTED: *5/5/87* REMEDIAL ACTIONS TAKEN: *NT*

RESPONSIBLE PARTY

RP#1-CONTACT NAME: *Paul A. Wilson*
COMPANY NAME:
ADDRESS: *1238 Stanyan St*
CITY/STATE: *San Francisco, CA 94117*
PHONE:

RP#2-CONTACT NAME:
COMPANY NAME: *Ultramar Inc*
ADDRESS: *P.O. Box 466, 5th W. Third St*
CITY/STATE: *Hanford, CA 93232-0466*
PHONE:

RP#3-CONTACT NAME:
COMPANY NAME:
ADDRESS:
CITY/STATE:
PHONE:

RP#4-CONTACT NAME:
COMPANY NAME:
ADDRESS:
CITY/STATE:
PHONE:

Ultramar

Ultramar Inc.
P.O. Box 466
525 W. Third Street
Hanford, CA 93232-0466
(209) 582-0241

92
Telecopy: 209-584-6113 Credit & Wholesale
209-583-3330 Administrative
209-583-3302 Information Services
209-583-3358 Accounting

January 6, 1992

Mr. Scott Seery
Alameda County
Department of Environmental Health
Hazardous Materials Program
80 Swan Way, Room 200
Oakland, California 94621

SUBJECT: FORMER BEACON SERVICE STATION NO. 574, 22315 REDWOOD ROAD,
CASTRO VALLEY, CALIFORNIA

Dear Mr. Seery:

Due to obtaining recent information regarding the above referenced site and the near-by former Chevron site we respectfully request an extension until February 7, 1992, for responding to your correspondence dated November 14, 1991.

The extension will provide sufficient time to prepare a comprehensive response which will include the recently collected data.

Please contact me if you have any questions regarding this information.

Sincerely,

ULTRAMAR INC.



Randall K. Stephenson
Environmental Specialist

574-ltr2



A Member of the Ultramar Group of Companies

BEACON
#1 Quality and Service



Chevron U.S.A. Inc.
 2410 Camino Ramon, San Ramon, California • Phone (510) 842-9500
 Mail Address: P.O. Box 5004, San Ramon, CA 94583-0004

Marketing Department

November 27, 1991

12/13/91
 Letter sent to RS in response to his request for reports documenting work at the Chevron site in proximity to the former Beacon station, 22315 Redwood Rd, Castro Valley. 503

Mr. Randall Stephenson
 Ultramar Inc.
 525 West Third Str.
 Hanford, CA 93230

Re: Former Chevron Service Station #9-2960
 2416 Grove Way
 Castro Valley, California

Dear Mr. Stephenson :

Enclosed is latest groundwater report dated November 2, 1991 and well installation report dated November 13, 1990 for the former Chevron service station.

Please, send a copy of the latest groundwater report and any future reports on the former Beacon station at the corner of Grove Way and Redwood Road to Chevron.

Sincerely,

Chevron U.S.A., Inc.

Kenneth Kan
 Engineer

91 DEC 10 09:12:07

Enclosure

LKAN/MacFile Ultramar

cc : w/o enclosures

➔ Mr. Scott Seery, Alameda County Environmental Health
 80 Swan Way, Room 200, Oakland, CA 94621

Mr. Rich Hiatt, RWQCB-S.F. Bay Region
 1111 Jackson Street, Room 6040, Oakland, CA 94607

Ms. Bette Owen
 Chevron U.S.A., Inc.

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)

FACSIMILE TRANSMITTAL

TO:

1-916-638-8385
Fax Phone Number

Floor/Room # _____

Name: Marty Burk
Title/Section

Agency: Delta Environmental

Address: Sacto

Phone #: (916) 638-2085

FROM:

Fax Phone Number

Floor/Room # _____

Date: 11-19-91

Time Sent: 8:05

Sender: Scott Seeley
Title/Section

Phone #: (510) 271-4320

Number of Pages Including Transmittal Sheet: 6

Special Instructions/Comments:

As discussed, 11/14 correspondence to Ultramar.

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)

Mr. Randall Stevenson
Ultramar Inc.
P.O. Box 466
525 W. Third Street
Hanover, CA 93232-0241

RE: [REDACTED]

Dear Mr. Stevenson:

The Alameda County Environmental Health Department, Hazardous Materials Division, has completed review of the July 15, 1991 Delta Environmental Consultants, Inc. preliminary site assessment (PSA) report, as submitted under Ultramar cover dated August 28, 1991. The noted report documents the results of the PSA, conducted during March and April 1991, which included the installation of three (3) ground water monitoring wells, and the collection and subsequent analyses of soil and ground water samples. Be advised that the opinions and directives expressed in this letter are in concurrence with the San Francisco Bay Regional Water Quality Control Board (RWQCB).

Review of the cited Delta report indicates the presence of significant soil and ground water contamination beneath the site. Soil samples collected during boring advancement exhibited concentrations of total petroleum hydrocarbon as gasoline (TPH-G) up to 3200 parts per million (ppm) in borings MW-1 and -2, at depths of 20 and 15 feet below grade (BG), respectively. A soil sample collected at a depth of 20 BG from boring MW-3 exhibited 230 ppm TPH-G. The soil classifications of the noted samples, based upon descriptions provided in the original Delta boring logs, range from clayey sand (SC), sandy clay (CL), to silty clay (CL) in borings MW-1, -2 and -3, respectively. Ground water appears to have been first encountered in a fine-grained sand-to-silty/clayey sand horizon appearing at an approximate depth of 22 feet BG during boring advancement.

Ground water gradient calculations, based upon ground water elevations reportedly measured April 1, 1991, indicate a shallow (0.015 foot/foot) gradient towards the south-southwest. (Note: Figure 3, "Water Table Contour Map - 4/1/91," shows the ground water elevation for MW-1 as 134.12' above MSL, the value given in Table 2 as that determined March 26, 1991 for this well, not April 1, 1991 as indicated.)

Mr. Randall Stevenson
RE: 22315 Redwood Road, Castro Valley
Page 2 of 5
November 14, 1991

No free phase hydrocarbons were identified during this round of sampling. However, elevated levels of dissolved phase hydrocarbons have been identified in all wells. Dissolved benzene levels were detected at concentrations of 340, 650, and 41 micrograms per liter (ug/l), or parts per billion (ppb), in ground water sampled from wells MW-1, -2, and -3, respectively. These levels exceed the state maximum contaminant level (MCL) of 1.0 ppb for this compound. TPH-G concentrations ranged from 3100 ppb in MW-3, to 10,000 ppb in MW-2, with MW-1 exhibiting 4100 ppb. Other volatile hydrocarbons (toluene, ethylbenzene, and xylenes) were also detected in elevated concentrations, none of which exceeded their MCLs. Diesel was not detected in either soil or ground water samples.

The data clearly indicate that a significant release or releases of fuel hydrocarbons occurred at this site, having impacted both soil and ground water. Latent high levels of soil contamination remain at or near the static ground water table beneath the site. The shallow ground water gradient, along with seasonal gradient fluctuations, is likely responsible for soils and ground water, both up- and downgradient of the tank field, to be impacted (with concentrations attenuated in the upgradient direction) as the contaminant plume "pancaked" once reaching ground water. Further, initial ground water gradient determinations, and the location of down gradient wells in close proximity to the southern property boundary, strongly suggest that the release has likely migrated off-site towards the south-southwest. Such off-site migration must be investigated, and ground water and soil contamination remediated.

At this time you are directed to initiate the following tasks:

- 1) Submit a work plan for the installation of additional monitoring wells/borings (Phase II). Such wells/borings are to be in sufficient number and appropriately located to identify the vertical and lateral extent of soil and ground water contamination associated with this site, both on- and off-site. The "zero line" of contamination is to be determined.
- 2) Water levels in **each** well are to be measured and recorded monthly for the next consecutive 12 months, **beginning December 1991 and ending December 1992**. Water levels are to be measured quarterly thereafter until case closure. All newly installed wells are to be monitored in this fashion (i.e., water levels measured monthly for 12 mos., reduced to quarterly thereafter). Gradient determinations are to be calculated for each month, and illustrated on gradient contour maps.

Mr. Randall Stevenson
RE: 22315 Redwood Road, Castro Valley
November 14, 1991
Page 3 of 5

- 3) Ground water samples are to be collected from each well monthly until further notice. Samples are to be analyzed for TPH-G and BTEX. Should concentrations of target compounds diminish, or appear to have stabilized, sampling frequencies may be reduced to a quarterly schedule, at a minimum, and only after approval from this Department.
- 4) Detailed summary reports are to be submitted quarterly until this site qualifies for final "sign off" by the RWQCB. Such reports are due the first day of the second month of each subsequent quarter (i.e., February 1, May 1, August 1, and November 1). The next report is due **February 1, 1992** and shall document the results of all site sampling/monitoring activities occurring during the 4th quarter of 1991.

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

- o Details and results of all work performed during the designated period of time: 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, tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of ground water contamination characterization
- o Interpretation of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations or plans for additional investigative work or remediation

The work plan submitted in response to Task 1, above, must adhere to the technical requirements outlined in the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks and the SWRCB LUFT manual. This work plan is due within 45 days of the date of this letter, **or by December 30, 1991**. A report documenting Phase II results is due within 45 days of the completion of field activities associated with this phase of work at the site.

Mr. Randall Stevenson
RE: 22315 Redwood Road, Castro Valley
November 14, 1991
Page 4 of 5

All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. Please include a statement of qualifications for each lead professional involved with Phase II of this project.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond 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 be further advised that Section 2652(d) of Title 23, California Code of Regulations (CCR), states that, "...until investigation and cleanup are complete, the owner or operator shall submit reports to the local agency or regional board, whichever is overseeing the cleanup, **every 3 months or at more frequent intervals, as specified by the local agency or regional board.** At a minimum, the reports shall include an update of the required information in subsection (c) of this section, and the results of all investigations and corrective actions. Information required by sections 2653 and 2654 shall be submitted as part of the periodic report to the local agency." [emphasis added]

Chapter 6.7, Section 25281, of the state Health and Safety Code defines "owner" and "operator" as follows:

(h) "Operator" means any person in control of, or having daily responsibility for, the daily operation of an underground storage tank system.

(i) "Owner" means the owner of an underground storage tank.

The Department recognizes that Ultramar Inc. was both the owner and operator of the tanks prior to their removal from the subject site in 1987. Therefore, Ultramar is clearly responsible for the investigation and remediation of the site, as well as submittal of reports documenting any all work associated with these tasks.

Lastly, a March 16, 1990 letter authored by Mr. John Randall of Chevron, and addressed to you, indicated that all reports associated with Chevron's site were enclosed with the noted letter. We recommend that Ultramar contact Chevron U.S.A. directly (510/842-9625) for any additional copies of reports associated with the environmental investigation at their Grove Way site.

Mr. Randall Stevenson
RE: 22315 Redwood Road, Castro Valley
November 14, 1991
Page 5 of 5

You may reach 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
Lester Feldman, RWQCB
Howard Hatayama, DTSC
Bob Bohman, Castro Valley Fire Department
Leslie Johnson, Esq., Miller, Starr, & Regalia
Paul Wilson
Frederick W. Reyland
files

3579

DATE: 11-12-91
TO : Local Oversight Program
FROM: Scott
SUBJ: Transfer of Eligible Oversight Case

Site name: Beacon Station # 574
Address: 22315 Redwood Road city Castro Valley zip 94546
Closure plan attached? Y N DepRef remaining \$ -51⁰⁰
DepRef Project # 568869 STID #(if any) ~~568869~~ 3579
Number of Tanks: 5 removed? N Date of removal 5/5/87
Samples received? N Contamination: yes - significant
Petroleum N Types: Avgas Jet Leaded unleaded Diesel?
fuel oil waste oil kerosene solvents
Monitoring wells on site 3 Monitoring schedule? N
LUFT category 1 2 3 * H S C A R W G O
Briefly describe the following:
Preliminary Assessment performed March/April 1991 - significant soil/GW contamination
Remedial Action none
Post Remedial Action Monitoring none
Enforcement Action none

date 1st reported 8-20-87

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)

August 22, 1991

Mr. Randall Stevenson
Ultramar Inc.
P.O. Box 466
525 West Third Street
Hanover, CA 93232-0466

RE: ~~FORMER BEACON STATION~~, 22315 REDWOOD ROAD, CASTRO VALLEY,
ALAMEDA COUNTY

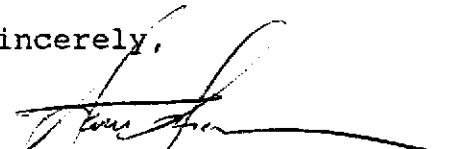
Dear Mr. Stevenson:

It has come to the attention of the Department that we have not received a report documenting the results of the preliminary site assessment (PSA) performed at the referenced former Beacon station in Castro Valley. We understand that field activities associated with this project were initiated at the site on or around March 26, 1991, nearly 5 months ago. As an inordinate amount of time has lapsed since field and laboratory work was likely completed, a report issued from the consultant, and Ultramar given time to review the data, you are hereby directed to submit the referenced PSA report forthwith.

Additionally, in correspondence dated November 21, 1990, you were advised that the current deposit/refund account established for this project had nearly been depleted. An additional deposit of \$1116 was requested. This topic was discussed with you by telephone during the early part of 1991, with a promise by you to follow-up on Ultramar's response to this request and report back to me. To date, the Department has no record that any additional monies have been received for this project, nor have you initiated any contact with me regarding this issue. You are hereby directed to remit this deposit immediately.

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

Sincerely,


Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Mark Thompson, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Leslie Johnson, Esq., Miller Starr, & Regalia
Paul Wilson
Frederick W. Reyland

22315 Redwood Rd.
C.U.

Beacon: call w/ Randy Stevenson (Ultramar) 2-21-81

- still waiting for right-of-entry signatures
 - final submitted to F.O. attorney last week
 - would expect signatures by this week or next
 - once received, drilling dates should be w/in 2 weeks
- ∴ looking at 1st 1/2 March for drilling

LAW OFFICES
MILLER, STARR & REGALIA
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

151 UNION STREET
ICE HOUSE TWO
SUITE 300
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE (415) 982-3838

ONE KAISER PLAZA
ORDWAY BUILDING, SUITE 1600
OAKLAND, CALIFORNIA 94612
FACSIMILE (415) 465-1202
TELEPHONE (415) 465-3800

101 YGNACIO VALLEY ROAD
SUITE 401
WALNUT CREEK, CALIFORNIA 94598
FACSIMILE (415) 933-4126
TELEPHONE (415) 935-9400

February 4, 1991

LESLIE A. JOHNSON

Mr. Richard S. Usher
Vice President and General Counsel
Ultramar
P. O. Box 93102
Long Beach, California 90809-3102

Re: 22315 Redwood Road, Castro Valley, California

Dear Mr. Usher:

On January 8, 1991, Mr. Randy Stevenson and counsel for Ultramar whose name I did not write down, called me and we discussed the status of the matter. It was my understanding from that conversation that a simple indemnity concerning only the acts relating to entry and storage of material would be forthcoming. I offered to draft that document but the gentleman from Ultramar said he would do so. I am still waiting for that document. It was my hope that this whole matter would proceed more quickly than it is and I reaffirm my offer to draft that document if that can expedite the matter.

Very truly yours,

MILLER, STARR & REGALIA


LESLIE A. JOHNSON

91 FEB -6 AM 11:16

LAJ:vse
cc: Randy Stevenson
Scott Seery
Paul Wilson

LAW OFFICES

MILLER, STARR & REGALIA

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ONE KAISER PLAZA

ORDWAY BUILDING, SUITE 1600

OAKLAND, CALIFORNIA 94612

FACSIMILE (415) 465-1202

TELEPHONE (415) 465-3800

101 YGNACIO VALLEY ROAD
SUITE 401

WALNUT CREEK, CALIFORNIA 94596

FACSIMILE (415) 933-4126

TELEPHONE (415) 935-9400

151 UNION STREET
ICE HOUSE TWO
SUITE 300
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE (415) 982-3838

December 28, 1990

LESLIE A. JOHNSON

Mr. Richard S. Usher
Vice President and General Counsel
Ultramar
P. O. Box 93102
Long Beach, California 90809-3102

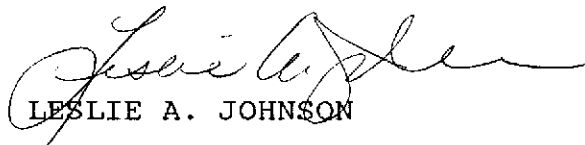
Re: 22315 Redwood Road, Castro Valley, California

Dear Mr. Usher:

Scott Seery called and indicated that Ultramar cancelled a drilling date apparently as a result of my letter to you of November 29, 1990. That letter addressed only the storage of material on or in the fenced enclosure which had been suggested to Mr. Stevenson as a possible storage spot. I do not believe that my letter could be construed as a request that all of your ongoing activities cease, but if that was the understanding which Mr. Stevenson had, that was not my intention. Again, my letter was limited to the fenced area and the issues raised if you wish to use that area. Please schedule the new drilling date as soon as possible.

Very truly yours,

MILLER, STARR & REGALIA


LESLIE A. JOHNSON

LAJ:vse
cc: Scott Seery

Ultramar

Ultramar Inc.
P.O. Box 466
525 W. Third Street
Hanford, CA 93232-0466
(209) 582-0241

Telecopy: 209-584-6113 Credit & Wholesale
209-583-3330 Administrative
209-583-3302 Information Services
209-583-3358 Accounting

December 13, 1990

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

**SUBJECT: FORMER BEACON STATION NO. 574, 22315 REDWOOD ROAD,
CASTRO VALLEY, CALIFORNIA**

Dear Mr. Seary:

In response to your letter dated November 21, 1990, approving the "Preliminary Hydrological Assessment Work Plan" prepared by Delta Environmental Consultants, a drilling date was tentatively scheduled for December 13, 1990. This drilling date has been cancelled due to the receipt of a letter dated November 29, 1990, from the attorney representing the owner of the property at the above-referenced address, requiring Ultramar to obtain a written agreement granting right of access to the property. Upon receipt of a signed agreement, a new drilling date will be scheduled. Once this date has been confirmed, you will be notified.

Please do not hesitate to call if you have any questions regarding this information.

Sincerely,

ULTRAMAR INC.



Randall K. Stephenson
Environmental Specialist I

RKS/cvn



A Member of the Ultramar Group of Companies

BEACON
#1 Quality and Service

TRANSMISSION REPORT

TIME : SEP 03 '91 14:17
TEL NUMBER : 415-568-3706
NAME : ALCO ENV HLTH HAZMAT

<u>NBR</u>	<u>CARD#</u>	<u>FILE</u>	<u>DATE</u>	<u>TIME</u>	<u>DURATION</u>	<u>PGS</u>	<u>TO</u>	<u>MODE</u>	<u>STATUS</u>
007		025	SEP 03	14:16	0:01'01"	2	2095833282	EC	04 OK

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Certified Mailer # 062 128 168

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

November 21, 1990

Mr. Randall Stevenson
Ultramar Inc.
P.O. Box 466
525 West Third Street
Hanover, CA 93232-0466

RE: FORMER BEACON STATION, 22315 REDWOOD ROAD, CASTRO VALLEY,
ALAMEDA COUNTY

Dear Mr. Stevenson:

This Department is in receipt of the November 6, 1990 addendum to the August 20, 1990 Delta Environmental Consultants, Inc. Preliminary Hydrological Assessment Work Plan. The noted November 6 addendum was apparently authored by Mr. Alan Waskin, Corporate Council, of Ultramar Inc.

Following review of the noted addendum, the August 20, 1990 Delta Environmental Consultants, Inc. work plan has been approved, as amended, with the following stipulations:

- 1) As was previously communicated in the September 19 correspondence from this office, and for the reasons indicated, well development and purge water, as well as soil cuttings resulting from the advancement of borings at this site, are to be temporarily stored within appropriately-labelled, DOT-approved steel drums pending their analyses to determine proper disposal. Until such time as the contents of these drums are analyzed and properly disposed, the drums are to be stored within a fenced enclosure or through other suitable means providing equal security. We suggest that you contact the current property owner so that you may gain access to the fenced enclosure already located behind the building presently on this site;
- 2) The Site Safety Plan must adhere to guidelines specified under Part 1910.120(i)(2) of 29CFR.

This Department expects that field activities associated with this project will be initiated within 30 days, or by December 21, 1990. Please notify this office (415/271-4320) when field work is scheduled to begin.

P 062 128 168

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, June 1963

Sent to RANDALL STEVENSON	
Street and No.	
P.O. State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

Complete items 1 and 2 when additional services are desired, and items 3 and 4 when additional services are desired, and items 5 and 6 when additional services are desired.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check boxes for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge)
 2. Restricted Delivery (Extra charge)

3. Article Addressed to:
Mr. Randall Stevenson
Ultramar Inc.
P.O. Box 466
525 W. 3rd St.
Handwritten: 932 32-0466

4. Article Number
P 062 128 168

Type of Service:
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Address
X

6. Signature - Address
X

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)

Mr. Randall Stevenson
RE: former Beacon Station, 22315 Redwood Road
November 21, 1990
Page 2 of 4

For your information, the statutory authority in California for the cleanup of contaminated soil and water for the sake of protecting water quality is found in language of the Porter Cologne Water Quality Control Act, as codified in California Water Code, Division 7. The State Water Resources Control Board, in Resolution No. 68-16 (reaffirmed July 1986), issued the "Statement of Policy with Respect to Maintaining High Quality of Waters in California" which called for the protection of existing, and restoration of previous, high quality of the state's waters. This policy sets the goal of the removal of all contamination from the soil, surface water, and ground water affiliated with a site impacted by contaminants, including those associated with leaks from underground storage tanks.

The Legislature, as presented in Water Code Section 13000, recognizes that "... the statewide program for water quality can be most effectively administered regionally, within a framework of statewide coordination and policy." Article 3, Section 13240 et seq., of the Water Code requires each Regional Water Quality Control Board (RWQCB) to formulate region-specific Basin Plans to meet water quality objectives of the state and the region in which the Plan will be implemented. Such Plans were developed by staff of each of the nine RWQCB by assessing the ambient surface and ground water quality occurring within their regions, identifying potential present and future beneficial uses, and determining the most appropriate means of protecting these water resources, including the establishment of prohibitions to minimize discharges of pollutants into waters, thus protecting aquatic life and public water supplies.

As a result of the region-specific approach to the development of these Plans, the degree to which water resources are protected will vary by region, much as the environmental, geologic, economic, and other factors influencing the development of such Plans would vary between regions. Hence, one should not expect that water quality goals established for Region 1 (North Coast), for example, would be identical to those of Region 4 (Los Angeles). Nor should one expect that the approach to assessing and remediating environmental impacts at a site in one region would be found acceptable in another.

The San Francisco Bay RWQCB (hereafter referred to as RWQCB) recognizes that all waters of the region are of significant present, or future, potential beneficial use. And, unlike some areas elsewhere in the State, there is a strong reliance in this region upon ground water resources, with first perennial ground water generally found at shallow depth (i.e., less than 50' below grade). Consequently, the RWQCB requirements for the investigation of fuel leak sites, even in the initial phases, are among the most technically rigorous in California. Guidance documents composed by the RWQCB are provided to those parties embarking on site investigations to clearly identify the minimum requirements and scope such an investigation must provide.

Mr. Randall Stevenson
RE: former Beacon Station, 22315 Redwood Road
November 21, 1990
Page 3 of 4

As you were made aware at the July 27, 1990 meeting between Ultramar, and Alameda County Environmental Health Department, Alameda County District Attorney's Office and RWQCB, the Health Department, through a memorandum of understanding (MOU), implements the RWQCB's requirements for the cleanup of sites contaminated by releases from fuel underground storage tanks, among others. Great effort has been expended by the RWQCB and this Department to produce a coordinated effort to ensure that the underground tank program is implemented in an appropriate and focused manner. An example of this effort is the meetings and multi-agency training sessions held monthly.

For the record, of the three work plan proposals submitted by Ultramar to date, only the most recent proposal, dated August 20, 1990 and written by Delta Environmental Consultants, Inc., came close to meeting the minimum technical and professional requirements for engaging in the initial stages of a site investigation in this region. This Department, following review of this document, required only that some clarifications be made pertaining to water sample collection, soil sampling protocol, target analytes, and drilling method, as well as bringing to Ultramar's attention that this Department had concerns regarding the proper temporary storage of drill cuttings and purge/development water, among other issues. Such concerns were based upon our knowledge of the site and its location. Further, the items presented in the May 21, 1990 correspondence from this Department clearly identify the technical and professional shortcomings of the prior two work plan submittals.

It is unfortunate that those individuals responsible for the technical oversight of environmental investigations on behalf of Ultramar feel that the task of submitting an approvable work plan proposal is an "onerous" one. We do not feel that a request for clarifications constitutes a change in the scope of work nor "modification to the Plan". It is not this Department's policy to assume that certain protocols will be followed if not clearly stated in a proponent's work plan.

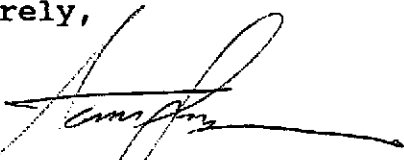
This Department's approach with the project has been consistent throughout: the proposal must meet the minimum requirements as outlined by the "Tri-Regional Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites," as summarized in Appendix A, which amend the LUFT Manual. This fact was first communicated to Ultramar in correspondence from this Department dated October 27, 1989, as well as in subsequent correspondence and telephone conversations. Further, Appendix A was initially provided to Ultramar enclosed with correspondence from this office dated March 8, 1990. It is, again, unfortunate that the technical resources made available to Ultramar have not been put to the best use, both in terms of the delays experienced in initiating the investigation, and in the monetary and human resources wasted.

Mr. Randall Stevenson
RE: former Beacon Station, 22315 Redwood Road
November 21, 1990
Page 4 of 4

Additionally, the current deposit/refund account established to compensate for time dedicated to this project by County personnel has been nearly exhausted. The balance remaining is \$16. Therefore, please remit a check totalling \$1116, made payable to Alameda County, to cover future costs in oversight of this project.

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

Sincerely,



Scott O. Seery
Hazardous Materials Specialist

cc: Rafat A. 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
G. Robert Hale, Alameda County Public Works Department
Bob Bohman, Castro Valley Fire Department
Leslie Johnson, Esq., Miller, Starr, & Regalia
Richard S. Usher, Ultramar
Dianne Lundquist, Shell Oil Company
Dale A. van Dam, Delta Environmental Consultants, Inc.
Paul A. Wilson
Fredrick W. Reyland

Ultramar

Ultramar Inc.
P.O. Box 466
525 W. Third Street
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(209) 582-0241

90 NOV 15 AM 11:57

Telecopy: 209-584-6113 Credit & Wholesale
209-583-3330 Administrative
209-583-3302 Information Services
209-583-3358 Accounting

November 6, 1990

Mr. Scott Seery
Alameda County
Department of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

Re: Preliminary Site Assessment
22315 Redwood Drive
Castro Valley, California

Dear Mr. Seery:

We are writing in response to your letter dated September 19, 1990 concerning this company's proposed preliminary site assessment work plan ("Plan"), which once again was submitted to you for your department's approval on August 24, 1990.

For the record, it was our understanding that our meeting with you and the California Regional Water Quality Control Board on July 27, 1990 produced a formal consensus of what was to be included in our Plan. The Plan as submitted to you is in total conformance with the material points agreed to at that meeting. For those issues which require simple clarification of the information provided to you in the Plan, we have no qualm with your request. However, where the issues concern further modification to the Plan, we have grave reservations as to the need for the requested changes.

To date, we have provided you with three work plans (April 3, 1990, April 30, 1990, and August 20, 1990), all of which are technically and professionally sound, yet upon submitting each work plan you have responded by requiring progressively more onerous and unnecessary restrictions on each of the abovementioned Plans. As we have communicated to you numerous times to date, Ultramar Inc. and Delta Environmental Consultants have conducted hundreds of site investigations under the direction of local, county, and state regulators. We assure you that all field protocol and materials used are deemed acceptable to the agencies. If you want to continue commenting on "deficiencies" in our work plans and requesting addendums, that is your prerogative, but if you are seriously interested in having an investigation conducted at this site, then we suggest that our most recent work plan be approved so that we may proceed.

We fail to understand why you consistently request information that is considered routine procedures for this type of an investigation. If it is because you are unfamiliar with the practical application of this type of investigation then we are more than willing to provide clarification. With this in mind, the following information is provided:



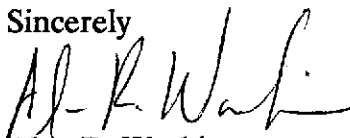
A Member of the Ultramar Group of Companies

BEACON
#1 Quality and Service

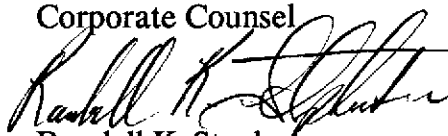
1. The soil samples collected from the borings drilled at the site will be analyzed for benzene, toluene, ethylbenzene, total xylenes (BTEX), and total petroleum hydrocarbons as gasoline (TPHg) and diesel (TPHd).
2. As the borings are advanced, soil samples will be collected at significant lithologic changes, but at a minimum of 5-foot intervals.
3. As typical of this type of investigation, a truck-mounted drill rig equipped with hollow-stem auger will be used for advancing the borings.
4. All developed and purged water from the monitoring wells will be stored in a 55-gallon DOT approved drums. All soil cuttings generated from the borings will be placed on and covered with plastic sheeting. It is established that the volume of soil generated will be less than 3 cubic yards. A composite soil sample, of four discrete sampling tubes, will be submitted for laboratory analysis of BTEX and TPH gas and diesel.
5. As the wells are developed, the produced water will be checked for stabilization of pH, temperature, and conductivity, and the wells will be allowed to recover a minimum of 80% prior to sampling. Sample collection will take place a minimum of 24 hours after development. This will provide sufficient time for well recovery.
6. A submersible pump will be used for well development, and disposable teflon bailers will be used for well sampling.
7. Equipment blanks will be collected to assure that the equipment has been properly decontaminated.
8. Since the analysis will include BTEX and TPHg, two 40ml VOA vials per well will be used to contain the samples. One-liter amber bottles will be used for the diesel samples. As standard for this type of analysis, the septum in each vial will be teflon.

Again, we want to stress that the proposal we submitted is based on our considerable experience in environmental assessment and remediation issues, and is submitted in accordance with the consensus reached at our July 27, 1990 meeting. We must reiterate that we believe that we have acted in good faith and have been extremely cooperative in our efforts to develop an environmentally sound preliminary site assessment plan. We consequently request that you promptly approve the plan as submitted so that we can undertake the assessment in question.

Sincerely



Alan R. Waskin
Corporate Counsel



Randall K. Stephenson
Environmental Specialist I

AW:bd

cc: Rafat A. Shahid, Assistant Agency Director, Alameda County Environmental Health
Department
Edgar Howell, Chief, Hazardous Materials Division
Gill Jensen, Alameda County District Attorney's Office
Mark Thompson, Alameda County District Attorney's Office
Lester Feldman, RWOCB
Howard Hatayama, DHS
G. Robert Hale, Alameda County Public Works Department
Bob Bohman, Castro Valley Fire Department
Leslie Johnson, Esq., Miller, Starr, & Regalia
Dianne Lundquist, Shell Oil Company
Dale A. van Dam, Delta Environmental Consultants, Inc.
Paul A. Wilson
Frederick W. Reyland

Ultramar

Ultramar Inc.
P.O. Box 466
525 W Third Street
Hanford, CA 93232-0466
(209) 582-0241

90 NOV 16 PM 2:06
Telecom: 209-584-6113 Credit & Wholesale
209-583-3330 Administrative
209-583-3302 Information Services
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November 6, 1990

Mr. Scott Seery
Alameda County
Department of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

Re: Preliminary Site Assessment
22315 Redwood Drive
Castro Valley, California

Dear Mr. Seery:

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A Member of the Ultramar Group of Companies

BEACON
#1 Quality and Service

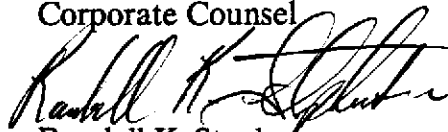
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2. As the borings are advanced, soil samples will be collected at significant lithologic changes, but at a minimum of 5-foot intervals.
3. As typical of this type of investigation, a truck-mounted drill rig equipped with hollow-stem auger will be used for advancing the borings.
4. All developed and purged water from the monitoring wells will be stored in a 55-gallon DOT approved drums. All soil cuttings generated from the borings will be placed on and covered with plastic sheeting. It is established that the volume of soil generated will be less than 3 cubic yards. A composite soil sample, of four discrete sampling tubes, will be submitted for laboratory analysis of BTEX and TPH gas and diesel.
5. As the wells are developed, the produced water will be checked for stabilization of pH, temperature, and conductivity, and the wells will be allowed to recover a minimum of 80% prior to sampling. Sample collection will take place a minimum of 24 hours after development. This will provide sufficient time for well recovery.
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7. Equipment blanks will be collected to assure that the equipment has been properly decontaminated.
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Again, we want to stress that the proposal we submitted is based on our considerable experience in environmental assessment and remediation issues, and is submitted in accordance with the consensus reached at our July 27, 1990 meeting. We must reiterate that we believe that we have acted in good faith and have been extremely cooperative in our efforts to develop an environmentally sound preliminary site assessment plan. We consequently request that you promptly approve the plan as submitted so that we can undertake the assessment in question.

Sincerely



Alan R. Waskin
Corporate Counsel



Randall K. Stephenson
Environmental Specialist I

AW:bd

cc: Rafat A. Shahid, Assistant Agency Director, Alameda County Environmental Health
Department
Edgar Howell, Chief, Hazardous Materials Division
Gill Jensen, Alameda County District Attorney's Office
Mark Thompson, Alameda County District Attorney's Office
Lester Feldman, RWQCB
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G. Robert Hale, Alameda County Public Works Department
Bob Bohman, Castro Valley Fire Department
Leslie Johnson, Esq., Miller, Starr, & Regalia
Dianne Lundquist, Shell Oil Company
Dale A. van Dam, Delta Environmental Consultants, Inc.
Paul A. Wilson
Frederick W. Reyland

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)

October 25, 1990

Mr. Randall Stevenson
Ultramar, Inc.
P.O. Box 466
525 West Third Street
Hanford, CA 93232-0466

RE: FORMER BEACON STATION, 22315 REDWOOD ROAD, CASTRO VALLEY,
ALAMEDA COUNTY

Dear Mr. Stevenson:

As we discussed by phone on October 24, the due date for submittal of an addendum to the August 20, 1990 Delta Environmental Consultants work plan for the investigation of the referenced site has been extended to November 9, 1990. The original date for submittal of this addendum was October 19, 1990.

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

Sincerely,


Scott O. Seery
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
G. Robert Hale, Alameda County Public Works Department
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Dale A. van Dam, Delta Environmental Consultants, Inc.
Paul A. Wilson
Fredrick W. Reyland

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



Telephone Number: (415)

Certified Mailer # P 062 128 095

September 19, 1990

DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
80 SWAN WAY, SUITE 200
OAKLAND, CA 94621
430 - 4530

Mr. Randall Stevenson
Ultramar, Inc.
P.O. Box 466
525 West Third Street
Hanford, CA 93232-0466

RE: PRELIMINARY SITE ASSESSMENT WORK PLAN PROPOSAL: FORMER BEACON
STATION #574, 22315 REDWOOD ROAD, CASTRO VALLEY, ALAMEDA COUNTY

Dear Mr. Stevenson:

Thank you for your recent submittal of the August 20, 1990 Delta Environmental Consultants, Inc. Preliminary Hydrological Assessment Work Plan, as submitted under Ultramar, Inc. cover dated August 24, 1990. The noted work plan, outlining proposed actions to assess the extent of contamination and subsurface conditions at the referenced site, has been reviewed by this Department in conjunction with the San Francisco Bay Regional Water Quality Control Board (RWQCB).

This work plan may be approved for this stage of the site investigation provided the following issues are clarified to the satisfaction of this Department:

- 1) Soil and ground water samples are to be analyzed for total petroleum hydrocarbons both as gasoline and diesel (TPH-G/D), as well as for benzene, toluene, xylene, and ethylbenzene (BTXE). The current proposal indicates that samples will only be analyzed for TPH-G and BTXE;
- 2) During boring advancement, soil samples are also to be collected at any significant change in lithology and areas of obvious contamination. The current proposal indicates that samples will be collected at 5-foot intervals, only;
- 3) Please indicate the type of drilling equipment planned for use (e.g., air rotary, hollow-stem auger, etc.);
- 4) Presently, several retail shops are located at this site. The site is situated at a very busy intersection in terms of both vehicular and foot traffic. As a result, drill cuttings and development/purge water must be stored in a secure fashion. Therefore, we request that not only development/purge water, but also soil cuttings, be stored within appropriately-labelled, DOT-approved drums, and that these drums are stored in a secured area. Please describe your plans to secure drill cuttings and development/purge water;

Mr. Randall Stevenson
RE: 22315 Redwood Road, Castro Valley
September 19, 1990
Page 2 of 3

- 5) The adequacy of well development should be confirmed by checking for temperature, pH, and conductivity stabilization. Further, please allow a minimum well volume recovery of 80%, and stabilization of the previously noted parameters, before the collection of samples for chemical analysis following well purging;
- 6) Certain plastics may contaminate samples with phthalate esters which interfere with many gas chromatography analyses. Therefore, bailers used for sample collection should be made of nonreactive material, such as Teflon FEP, stainless steel, and linear polyethylene (LPE). Of these, Teflon and stainless steel are the preferred materials. Bailers used for subjective analyses (sheen, "floaters", odor) should be thoroughly decontaminated before being used again to collect samples for analysis, or discarded and a new one used, if of the disposable type;
- 7) It is recommended that the QA/QC sampling protocol also include equipment blanks to check the adequacy of sampler decontamination;
- 8) Please indicate the number and volume of water samples to be collected, and the type, size, composition, and septum material for each sample container, for the specific chemical analysis performed. For example, analysis for BTXE requires the collection of two (2) 40ml VOA vials secured with plastic caps and Teflon septums;
- 9) Please be certain that the Site Safety Plan adheres to guidelines specified under Part 1910.120 (i)(2) of 29CFR.

Please respond in writing to the previous list of items within 30 days, or by October 19, 1990. Your response should be in the form of an addendum to the August 20 work plan. Please also feel free to contact me at 415/271-4320 should you have any questions regarding the content of this letter.

Sincerely,



Scott O. Seery
Hazardous Materials Specialist

Mr. Randall Stevenson
RE: 22315 Redwood Road, Castro Valley
September 19, 1990
Page 3 of 3

cc: Rafat A. Shahid, Assistant Agency Director, Alameda County
Environmental Health Department
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Mark Thompson, Alameda County District Attorney's Office
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files

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Telecopy: 209-584-6113 Credit & Wholesale
209-583-3330 Administrative
209-583-3302 Information Services
209-583-3358 Accounting

August 24, 1990

Mr. Scott Seery
Alameda County
Environmental Health Department
80 Swain Way
Room 200
Oakland, CA 94621

**SUBJECT: FORMER BEACON STATION 574, 22315 REDWOOD ROAD,
CASTRO VALLEY, CALIFORNIA**

Dear Mr. Seery:

As per your request, I have enclosed for your review a work plan to conduct a preliminary assessment of the possible presence of hydrocarbon constituents beneath the above-referenced site. Upon your approval of the work plan, Delta Environmental Consultants will begin the investigation. Please continue to address all correspondence related to this project site to Ultramar.

If you have any questions regarding the enclosed work plan or the project, please contact me.

Sincerely,

ULTRAMAR INC.



Randall K. Stephenson
Environmental Specialist I

RKS/cvn

Enclosure: Delta Project No. 40-90-818 Work Plan

cc w/enc.: Mr. Steven Luquire
CRWQCB
San Francisco Bay Region
1800 Harrison Street
Suite 700
Oakland, CA 94612



A Member of the Ultramar Group of Companies

BEACON
#1 Quality and Service

August 31 - Draft

- Agreed to submit "Draft" by Aug. 31, under RG seal.
- Once this "draft" is approved, the plan will go out to bid.
- Once a contractor has been chosen, a SSP will be generated, attached to the FSA, and the whole package submitted under RG seal.
- Upon approval, the work may proceed.

① CEG/RG: Qualifications

III. Plan for determining extent of soil contamination on site.

A. Excavation NA

B. Method

1) Soil gas

- identify expected depths ^{and number} of ~~the~~ probes
- identify ~~the type of probe~~
- discuss QA/QC protocol for ^{field} survey. ~~Station survey~~ ~~should include~~ ~~probes~~ ~~There~~, ~~be collected~~ ~~for laboratory~~ ~~analysis~~
- Discuss sample collection and analyses. ~~How~~ ^{How will} samples be collected for analyses (Tellar or Teflon bags, charcoal cartridges, GC syringes, stainless steel canisters, etc.)? What type of field organic vapor

Pumps? →

monitors will be used (PID, FID, portable GC, etc.)? Are ^{any} samples to be collected for confirmatory laboratory analyses? If so, how will these be selected?

- Discuss probe decontamination procedures: Are probes cleaned between sampling points? If so, how? ^{fresh} probes used between sampling points?

2) Soil vapor

used during ^{successful in} soil vapor surveys have been shown useful in specific cases to detect ^{volatile organic compounds} plumes of contaminated groundwater. This, ^{directly dependent upon such factors as} of course, is ^{type} directly related to the underlying ^{moisture content} sediments, ~~at~~ ~~the~~ ~~depth~~ ~~to~~ ~~groundwater~~, ~~the~~ ~~thickness~~ of the oxidation zone, ^{depth of the probe} and the age of the ^{released or product} ~~contaminant~~.

This being the case, it would seem highly desirable to conduct the proposed soil vapor survey about the entire site, rather than limiting its use to ~~the~~ ~~proposed~~ ~~study~~ ~~area~~ northeast of the ~~former~~ ~~tank~~ ~~pit~~. This is particularly important when, as you have clearly indicated, the

where soil contamination has been shown to

use of the soil vapor survey is to determine the "best" location to advance borings, one of which will be completed as the sole groundwater monitoring well. Your proposed study area ~~is~~ is in the inferred upgradient position from the ~~the~~ former tank pit. [SEE: GeoStrategies, Inc., ^{Report No. 710-2, proposed} ~~April 4, 1990~~ work plan, ~~pp. 1-3~~ April 4, 1990; former Chevron Service Station No. 2960, 2416 Grove Way, Castro Valley], therefore it appears likely that, as currently proposed, any wells sited based on the ~~proposed~~ results of the ~~current~~ ^{scope of the} proposed soil vapor survey will not satisfy the requirement for this well to be located in the inferred downgradient position.


IV Plan for determining H₂O contamination

A. Placement & rationale for location of wells

The current rationale for placement of groundwater well(s) does not reflect the ~~need to have~~ ^{requirement for the placement of} a ~~minimum~~ ^{minimum} of one

within 10 feet of monitoring well

in the verified downgradient position from the former tank pit. As noted ^{in Item (1)} above, the best potentiometric data ~~is~~ ^{is} ~~in~~ ⁱⁿ ~~the~~ ^{the} ~~vicinity~~ ^{vicinity} of this ~~site~~ ^{site} has a gradient of approximately 0.005 towards the southwest. If you limit your ~~the~~ ^{investigation} to the NE of the ^{former} tank pit by the installation of ~~only~~ ^{only} one ~~well~~ ^{well} groundwater monitoring well, you will need to install additional wells:

~~By installing~~ ~~one~~ currently available strongly suggests that groundwater in the vicinity of this ^{site} has a ^{hydraulic} gradient of approximately 0.005 towards the southwest. If you limit your ~~the~~ ^{investigation} to the NE of the ^{former} tank pit by the installation of ~~only~~ ^{only} one ~~well~~ ^{well} groundwater monitoring well, you will need to install additional wells: one in the inferred downgradient position, SW of the tank pit, or one elsewhere on the site. These three wells should provide good triangulation for the solution to a three-point problem ^{to verify} ~~to determine~~ site-specific potentiometric conditions. 

All soil samples are to be handled as though ^{they will} be analyzed. ~~collection~~ the sample ~~tube~~ is to be capped on both ends with (ie, teflon/foil sheets, capped, taped, iced). Soil samples are to be analyzed separately. The sample from the ^(at any enclosure) uppermost zone is to be analyzed first. Succeeding samples must be analyzed if any sample above is determined to be contaminated (ie, any detectable level of target compounds) or if field evidence (ie, vapors, odors, or staining) of contamination at any depth ^{there is}.

III B.

2. soil borings

- describe soil boring abandonment procedures
- plans for disposal / storage of cuttings

soil samples should be collected at 5' intervals beginning at the ~~approx~~ depth of the former UST, any change in lithology, ~~and~~ areas of obvious contamination down to the water table. approximately equal to backfill/native soil interface

IV B. Drilling methods

comparator x
com side

- Indicate diameter of well casing
- minimum casing diameter is 2"
- Slot & filter pack sizing must be based upon results of particle analyses (ASTM D-422) from the stratigraphic unit
- Construction diagram for wells | to be monitored as determined from at least one boring at 10' side
- Development method & criteria for determination of development adequacy
- wells must be surveyed ^{vertically to NSC and horizontally} to an established benchmark ~~to~~ to the accuracy of 0.01 feet

19575 ~~Standard~~ Ave

Hayward - Plans for disposal of soil cuttings, and development water.

- C. - Discuss water level measurement procedures
- QA/QC
- wells should be allowed to stabilize a minimum of 24 hrs after development before assessing the presence or thickness of free product and sample collection

- floating product should be measured before purging ^{the} prior to collection of ~~samples~~ ^{water} for ~~analysis for the presence of~~ dissolved ~~constituents~~ ^{product analysis}.

- Bailers used for collection of water samples should ^{also} be cleaned between sampling points.

- Purge water disposal plans

V Site Safety

Submit Site Safety Plan

Reference is made to a site S.P. on Page 5, item 1 ^{is} under "Proposed work", and Page 6, although no site safety plan is provided. It's not adequate to allude to such a plan w/o preparing one

Soil gas

- QA/QC protocol should address, among others, the sampling method, the analytical method, and the data reduction & reporting steps. Duplicates, field/trip blanks.
- Sample collection: what equipment (driven probes, shallow wells, etc.) what depth? Collection devices (Tedlar or Teflon bags, charcoal cartridges, SS canisters, GC syringes?)
- # of probes and depths; type of probe
- decontamination procedures; are probes to be cleaned between sampling points or will ^{fresh} pre-cleaned probes be used for each point?

AND MORE

Officer Blain of COFPD
called yesterday (5-10)

III. B.

1) Soil gas

should address which ~~others~~ among others

- identify ~~subcontractor~~ contractors
- QA/QC protocol
- what equipment used
- methods of analyses
- # of probes & depth

(ie, dipan probes, shallow "wells", etc) cartridges
 collection devices (Tedlar bags, charcoal syringes, SS canisters, GC syringes, analytical methods (dragage, EVA, Field GC, used G...))

2) soil borings

- decontamination methods
- boring abandonment methods

C. Method is criteria for

~~_____~~
~~_____~~

- Need downgradient well (min. 1) in confirmed down gradient position ~~from the~~ & w/in 10' of the former tanks. Plate F-3 appears to indicate no wells would be installed in the inferred down gradient position for the vapor survey is to be conducted, as proposed, north & NE of the pit.
- Slot/filter pack sizing techniques (ASTM D-422)
- Construction drawing for well(s)

~~SES~~

- Minimum of (1) well must be installed in the Confirmed downgradient position; this may or may not be where the soil vapor survey shows hot readings.
- CEG/EG on proposal
- well schematic diagrams
- All samples collected should be analyzed for the suspect contaminants. OVM readings in the field < 100 ppm do not necessarily represent actual concentrations of TPH; volatile vs. less volatile fractions / old vs. new fuel.
- Disposal / storage procedures (drill cuttings, water, etc.)
- QA/QC
- Equipment decontamination
- Who is consultant? Name, phone #, addresses, qualifications of key personnel
- filter pack: slot sizes should be determined following particle analyses (ASTM D-422) from the stratigraphic unit to be monitored as determined from at least one boring at the site
- Well elevation survey w/in 0.01 ft
- Survey of wells w/in 1/4-mile radius
- ~~well head security measures~~

storage?
- plans for disposal of ~~soil~~ drill cuttings and
~~formation~~ water generated ~~by~~ as result of well development &
purgings. ~~before completion~~.

- plans for surveying wells

- water level measurement procedure (how?)

- QA/QC

- site Safety Plan



Alameda County
District Attorney's Office
John J. Meehan, District Attorney

July 5, 1990

Richard S. Usher
Vice-President and General Counsel
Ultramar Inc.
P. O. Box 93102
401 E. Ocean Blvd.
Long Beach, CA 90809-3102

Re: 22315 Redwood Drive, Castro Valley, CA

Dear Mr. Usher:

Thank you for sending me a copy of your June 8, 1990 letter to Hazardous Materials Specialist Scott Seery.

Before Mr. Seery sent you his May 21, 1990 letter, Mr. Seery and I reviewed its content in detail. Mr. Seery also reviewed the content with Steve Luquire of the California Regional Water Quality Control Board-San Francisco Bay Region. As you know, through a memorandum of understanding between the Regional Board and Alameda County Health, Health acts as implementing agency for oversight of remediation of contaminated sites in this county. Both Mr. Luquire and I concurred with Mr. Seery's evaluation of the matter.

This case results because Applied Geo System's report of June 25, 1987 detailed volatile hydrocarbons in excess of 3000 ppm at the site. Unfortunately, an adequate preliminary site assessment including the installation of a suitable number of monitoring wells was not performed when the contamination was discovered.

Mr. Stephenson's current proposal does not exceed the Tri-Regional Recommendations. The Recommendations require the initial installation of three wells when site specific groundwater gradient information is unknown. At least one, and preferably two, of these wells must be located in the inferred down-gradient position from the tank pit. The current proposal proposes one well, up-gradient. This is not adequate.

Our insistence that the work plan be submitted under the authority of a registered geologist or engineer is a reasonable one. Enclosed please find Appendix A of the Tri-Regional Recommendations. Paragraph two states: "A statement of qualifications and registration number for the California

Letter to Mr. Richard Usher
July 2, 1990
Page two

registered engineer and/or registered geologist responsible for the project will need to be included with the submitted workplan and reports."

Mr. Seery's request for QA/QC is consistent with Appendix A of the Tri-Regional Recommendations, the LUFT Manual and accepted scientific practice. I fail to see how a brief statement in the proposal regarding QA/QC would eliminate flexibility, options and competitive bidding.

I share your desire to focus resources on action. However, the action taken must be adequate to address the problem.

I think your request for a meeting is a good idea. Mr. Seery, Mr. Luquire and I are available to meet and confer on July 27 at 9:00 a.m. My office is located about 10 miles from Oakland International. Please advise me at (415) 670-5150 whether this date and time is a convenient one.

Very truly yours,

JOHN J. MEEHAN
DISTRICT ATTORNEY

By:

Mark N. Thomson

Mark N. Thomson
Deputy District Attorney

cc: Scott Seery
Steve Luquire

JJM:MNT:shb

P 062 128 095

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Mr. Randall Stevenson

Sent to Ultramar, Inc.

Street and No 525 W. Third St.
P.O. Box 466

P.O. State and ZIP Code
Hanford, CA 93232-0466

Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom Date and Address of Delivery	
TOTAL Postage and Fees	\$

Postmark or Date
Sept. 19, 1990

PS Form 3800, June 1985

Ultramar

Ultramar Inc.
P.O. Box 93102
401 E. Ocean Blvd.
Long Beach, CA 90809-3102
(213) 495-5300

Telecopy: 213-491-1263 Marketing & Administration
213-436-0312 Marketing & Administration
213-495-5222 Information Services

Telex: 910-6341-6833

June 8, 1990

Mr. Scott Seery
Alameda County
Department of Environmental Health
80 Swan Way, Room 200
Oakland, California 94621

Reference: Preliminary Site Assessment
22315 Redwood Drive
Castro Valley, California

Dear Mr. Seery:

I received your letters of May 21, 1990 regarding the above site. It is not clear why you forwarded me a copy of your letter to Mr. Stephenson as I have total confidence in his handling of this matter. Nevertheless, your letter prompted me to look into this matter and the results have compelled me to respond to you directly.

The positions and attitudes expressed in your letters are greatly disturbing and disappointing. We have not only been cooperative, but have voluntarily proposed an assessment plan which exceeds the requirements of the Tri-Regional Guidelines, Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks. Despite the obvious existence of other potentially responsible parties, we have tried to focus resources on action, not wasteful disagreement. These efforts have been frustrated by your refusal to approve the proposal. Your focus is on the format you wish for the proposal, not of working with a cooperative party to address an issue. Moreover, I found your letter to be antagonistic, formalistic and unreasonable. I would think that your objective should be to assess the property, not to insure that the proposal meets your concept of the appropriate style.

*The plan doesn't
even meet the
minimum
requirements; how
can it be stated
that said plan
exceeds it?*

*Efforts have been
frustrated by
the submitter of
substandard plans.*



A Member of the Ultramar Group of Companies

BEACON
#1 Quality and Service

Mr. Scott Seery
June 8, 1990
Page 2

The current request for assessment is a result of facts reported over three years ago when the tanks were removed by Beacon, not because of any current problem. At that time, soil was excavated to 22 feet, aerated for over a month, sampled and analyzed for confirmation of remediation and returned to the excavation area. The only unresolved issue of potential contamination were a few residual hot spots which were detected at a depth of 20 feet up gradient of the tank pit. This area was excavated an additional 2 feet and aerated for over a month, rendering it likely that little contamination remained. While we agree that documentation of this result was not made, there is no indication that a current threat exists from these locations. Nevertheless, we submitted a proposal to confirm this fact.

It is not being informed, apparently, re: the H₂O issue. Soil contamination is not the prime concern of the [unclear]

The proposal we submitted is based on our considerable experience in underground storage tank environmental issues. Because of our experience and our excellent working relationships with many supervising agencies, we were surprised and disappointed at your response. Our intent is to spend money to solve problems, not to purchase useless or unnecessary work from consultants. The proposal we submitted is consistent with practices which have been approved by other agencies and have been utilized successfully throughout the state. Your response, and particularly the tone of your letters and your characterization of a difference of opinion as "deficiencies", is unfortunate and inflammatory. We do not find your opinion persuasive and believe your approach is unnecessary and wasteful. Some examples are:

- o Your insistence that a registered geologist submit the proposal. As the proposal does not require geologic or engineering evaluations, we do not believe this is necessary. Your suggestion will simply raise the costs of the proposal. Certainly any work or report will be supervised and signed by a certified or registered geologist, but a proposal should not require such expense.

Based on the scope of the proposed work, it is not clear that a S.M. 2000 the end would not produce a reliable reporting of real data, representative of the actual on-site conditions.

Mr. Scott Seery
June 8, 1990
Page 3

Considering

- o The extensive QA/QC and procedures you want in the proposal is also unnecessary and wasteful. Those items should determine if the report itself is acceptable and not be a focus for the proposal. We bid out proposed work and different consultants may prefer different procedures. By casting the procedures in the proposal, you would eliminate flexibility, options and competitive bidding. The work we propose will meet all laws and regulations, but the proposal itself does not need to be so detailed.
- o Your demand for a groundwater well down gradient of the tank pit ignores the fact that considerable information is known about this site. The residual contamination was not in the tank pit, but up gradient from the pit and possibly from a product line release. Moreover, the data does not indicate lateral mitigation. Your request for 3 wells is unjustified given the current facts. Further, planning wells without evaluating any impact from known floating product contamination immediately up gradient at the Chevron site is poor practice.

? how so?
The proposal does not yet meet the SF 200000 min requirements!

That's because no data yet exists.

> 3 wells is required for all preliminary assessments by BLM.

Your position focuses on form over substance and your attitude is uncooperative and counterproductive. We are amenable to addressing the underlying concern of contamination, but find your requests quite unacceptable. If you have specific concerns about our proposal, we would be willing to meet with you and your supervisor to resolve them. If, however, you wish to maintain your focus and insist on the unnecessary expenditure of monies, we will withdraw our offer to voluntarily conduct this assessment. Unfortunately, this will lead to the involvement of more parties and a great waste of resources determining responsibility and proper procedure. I cannot believe that your agency finds the best interest of the public served by your bringing expensive and time consuming enforcement actions because

... This is incorrect. The fact that the substance is not clearly evident in the proposed workplan is the basis for the proposal's rejection. Form has little to do with it. Type and substance does.

Mr. Scott Seery
June 8, 1990
Page 4

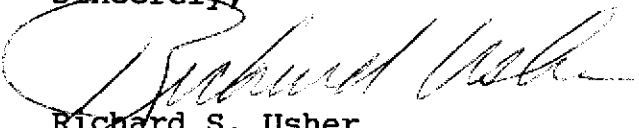
*Volunteered under duress, and only after
the company's attorney negotiated
with them*

you disagree with the format of a proposal by a party
which has volunteered to perform an assessment meeting
RWQCB guidelines.

*This proposal
does not illustrate
this point!*

Please let me know if you wish to meet with us.

Sincerely,


Richard S. Usher
Vice President
and General Counsel

RSU:scs

cc: Rafat A. Shahid, Assistant Agency Director,
Alameda County Environmental Health Department
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District
Attorney's Office
Mark Thomson, Alameda County District
Attorney's Office
Lester Feldman, California Regional Water
Quality Board
Leslie Johnson, Miller, Starr and Regalia
Attorneys at Law
Randall K. Stephenson, Ultramar Inc.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Certifide Mailer #P 062 127 937

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

May 21, 1990

Mr. Richard S. Usher
Ultramar, Inc.
P.O. Box 93102
Long Beach, CA 90809-3102

RE: REVIEW OF PRELIMINARY SITE ASSESSMENT PROPOSAL: FORMER BEACON
STATION #574, 22315 REDWOOD ROAD, CASTRO VALLEY, ALAMEDA COUNTY

Dear Mr. Usher:

Attached please find a copy of a letter from this Department addressed to Mr. Randall Stevenson of Ultramar, Inc. The noted letter presents a 7-page list of deficiencies identified following this Department's review of the April 30, 1990 Ultramar, Inc. preliminary site assessment workplan proposal submitted to outline plans for the environmental investigation of the referenced site.

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
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Mark Thompson, Alameda County District Attorney's Office
Leslie Johnson, Esq., Miller, Starr & Regalia
files

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION

Effective February 1, 1990

UNDERGROUND STORAGE TANK FEE SCHEDULE

REMOVAL/INSTALLATION/
MODIFICATION FEE

\$ 375
558

PS Form 3800, June 1983

P 062 127 937
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3. Article Addressed to:
MR. Richard Usher
ULTRAMAR, INC
P.O. BOX 93102
Long Beach, CA 90809-3102

4. Article Number
P062 127 937

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MAY 23 1990

8. Addressee's Address (ONLY if requested and fee paid)

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1049
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17
18

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Certified Mailer #P 062 127 934

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

May 21, 1990

Mr. Randall Stevenson
Ultramar, Inc.
525 W. Third Street
P.O. Box 466
Hanford, CA 93232

RE: PRELIMINARY SITE ASSESSMENT WORK PLAN PROPOSAL: FORMER BEACON
STATION #574, 22315 REDWOOD ROAD, CASTRO VALLEY, ALAMEDA COUNTY

Dear Mr. Stevenson:

This Department is in receipt and has completed review of the April 30, 1990 document entitled "Work Plan, Limited Subsurface Environmental Investigation at Former Beacon Station No. 574, 22315 Redwood Road, Castro Valley, California". This document is a revised version of the original April 3, 1990 submittal, and summarizes the scope of work proposed by Ultramar, Inc. to assess the extent of latent fuel hydrocarbon contamination in soils and groundwater underlying the referenced site.

As has been previously communicated to you in correspondence dated October 27, 1989 and March 8, 1990, and telephone conversations of April 11 and May 8, 1990, all proposals and reports are to be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. Further, a statement of qualifications for this registered professional was to be included with the submittal of your workplan. Neither the April 3 nor April 30, 1990 proposals have been submitted under the seal of a registered professional appropriate to the scope of work required at this site. **Future submittals will not be accepted nor reviewed unless under seal of an appropriate professional of professionals under whose direction this project is being conducted.**

The current work plan is not approved. The workplan may be approved for the initial stage of site contaminant assessment provided the following issues are resolved to the satisfaction of this office:

SOIL VAPOR SURVEY

- 1) Identify the expected depths and number of soil vapor probe sampling points;

Mr. Randall Stevenson

RE: former Beacon Station #574, 22315 Redwood Road

May 21, 1990

Page 2 of 7

- 2) Discuss quality assurance/quality control (QA/QC) protocol for field soil vapor survey activities;
- 3) Discuss soil vapor sample collection and analyses methods. How will samples be collected for analyses (i.e., Tedlar or Teflon bags, charcoal cartridges, GC syringes, stainless steel canisters, etc.)? Are vapor samples to be drawn through the probes using pumps? What type of field organic vapor monitor (OVM) will be used (i.e., PID, FID, portable GC, explosimeter, etc.)? Are any samples to be collected for confirmatory laboratory analyses? If so: How will these be selected? What analytical methods would be performed on such samples? Will these data be used to confirm, or replace, that obtained during the field portion of this survey?
- 4) Discuss probe decontamination procedures. Are probes to be cleaned between sampling points? If so, how? Or, will fresh precleaned probes be used for each discrete sampling point?
- 5) We recognize that collection and analyses of samples drawn through small-volume, driven ground probes during the performance of soil vapor surveys have been shown successful in specific cases to detect and map contamination in both soils and groundwater. The success of this technique is strongly dependent upon such factors as the type and moisture content of underlying sediments, depth of the sampling probe and to groundwater, thickness of the oxidation zone, the chemical nature of the target contaminant, and the age of the spill, among others. Such soil vapor surveys can, and do, prove to be powerful screening tools in determining the best locations to site borings and groundwater monitoring wells. Understanding this, it would seem highly desirable to conduct the proposed soil vapor survey about the entire site, particularly downgradient from the perceived source, and, if the results of such a survey suggest that contaminants have continued to migrate beyond the limits of the property, off-site as well.

Mr. Randall Stevenson
RE: former Beacon Station #574, 22315 Redwood Road
May 21, 1990
Page 3 of 7

As currently proposed, the soil vapor study area has been limited to the eastern portion of the subject site, approximately northeast of the former tank pit, an area where the highest levels of soil contamination are expected to remain. The proposal indicates that the results of the soil vapor survey will be plotted on a site map to determine the areas of highest total volatile hydrocarbon (TVH) concentration. Those areas identified as exhibiting the highest TVH concentrations "...will then be used to locate the soil borings", strongly suggesting that the location of the borings will be solely within the proposed study area. One (1) of the borings is planned to be completed as a groundwater monitoring well. Based upon the best potentiometric data currently available for another site approximately 200-feet northeast of the subject site, the proposed study area is located in the inferred upgradient position from the former tank pit, drastically limiting the usefulness of the single groundwater monitoring well proposed for this site. [See: GeoStrategies, Inc. Report No. 7170-2, Proposed Workplan, April 4, 1990; Former Chevron Service Station No. 2960, 2416 Grove Way, Castro Valley]

It is strongly suggested that the soil vapor survey proposal be modified to incorporate the entire site as the study area if, in fact, such a survey will be used as a tool to adequately site groundwater monitoring wells and borings.

GROUNDWATER WELLS / BORINGS

- 1) The current rationale for placement of groundwater wells does not reflect the requirement for the initial placement of a minimum of one (1) well within 10-feet of, and in the verified downgradient position from, the former tank pit. Verifying site-specific groundwater gradient conditions of a site requires the initial installation of no fewer than three (3) wells and, depending on the complexity of the aquifer or aquifers which underlie a site, perhaps as many as four or more.

Mr. Randall Stevenson

RE: former Beacon Station #574, 22315 Redwood Road

May 21, 1990

Page 4 of 7

As noted in item 5 above, the best potentiometric data currently available strongly suggests that groundwater in the vicinity of this site has a hydraulic gradient of approximately 0.005 towards the southwest. The proposed installation of one (1) groundwater monitoring well in the area northeast of the former tank pit, inferred as being upgradient from the tank pit, is fine provided a minimum of two (2) additional wells are also installed at this time: at least one in the inferred downgradient position, southwest of the former tank pit; and, one elsewhere on the site such that good triangulation is achieved between the well locations. It is preferable that this third well also be located downgradient from the tank pit. Of course the actual placement of wells is limited by the location of structures and other improvements on the site. Once surveyed, these three wells will then provide a basis for the solution to a three-point problem verifying the site-specific potentiometric conditions;

- 2) Indicate the diameter of the well casings. The minimum well casing diameter which will be accepted is 2";
- 3) Slot and filter pack sizing must be based upon results of particle analyses (ASTM D-422) from the stratigraphic unit to be monitored as determined from at least one boring at the site;
- 4) Provide a schematic well construction diagram;
- 5) Discuss the storage and disposal of formation water generated as a result of well development and purging. Also, discuss the storage, characterization, and disposal of drill cuttings;
- 6) Describe soil boring abandonment procedures;
- 7) During advancement of all borings, soil samples should be collected at 5-foot intervals beginning at the depth coincident with the former tank backfill/native soil interface, at any change in lithology, and areas of obvious contamination (i.e., odors, discoloration, "hits" on the field OVM , etc.), down to the water table.

Mr. Randall Stevenson

RE: former Beacon Station #574, 22315 Redwood Road

May 21, 1990

Page 5 of 7

All soil samples are to be handled as though they will be analyzed (i.e., ends covered with Teflon/foil sheets, capped, taped, labelled, iced, and chain-of-custody). Soil samples are to be analyzed separately. The sample from the uppermost zone of each boring is to be analyzed first. Succeeding samples must be analyzed if any sample above is determined to be contaminated (i.e., any detectable level of target compounds) or if there is field evidence of contamination at any depth;

- 8) Provide assurance that wells will be surveyed vertically to mean sea level (MSL) and horizontally to an established benchmark to the accuracy of 0.01 foot;
- 9) Discuss water level measurement procedures and methods. In the Ground-Water Sampling section of the FIELD PROTOCOLS Appendix, mention is made of performing water level measurements but a brief discussion as to the technique(s) used to accomplish this task is not provided;
- 10) Groundwater sampling must occur a minimum of 24-hours after well development. However, it is strongly recommended that a period of 72-hours pass between development and sampling so that any low-density, immiscible organics present can stabilize, facilitating the identification of any floating product. The thicknesses of such "floaters" should be measured and recorded before purging the wells prior to the collection of water samples;
- 11) Discuss decontamination procedures for bailers between sampling points;
- 12) Discuss groundwater sampling QA/QC protocol. At a minimum, trip and field blanks should be incorporated as a part of each water sampling episode. These "blanks" should be analyzed for the same constituents as those collected from the on-site wells, and the results provided with your report.

GENERAL

- 1) The Site Map should also identify the location of any structures and other above- or below-ground improvements which may influence the siting of soil vapor probe sample points, borings and wells;

Mr. Randall Stevenson
RE: former Beacon Station #574, 22315 Redwood Road
May 21, 1990
Page 6 of 7

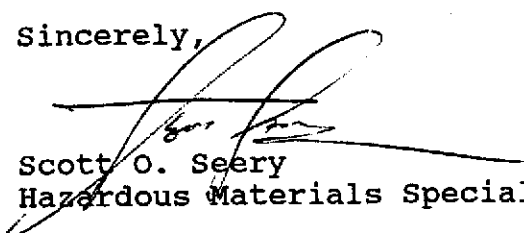
- 2) Submit a Site Safety Plan. The April 30 proposal references the need to prepare such a plan but none is actually provided with this or the prior (April 3) submittal. Please be certain that the proposed Site Safety Plan adheres to guidelines specified under Part 1910.120(i)(2) of 29 CFR.
- 3) As indicated previously in paragraph 2 of page 1 of this letter, all reports and proposals are to be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. Include a statement of qualifications for the appropriate professional or professionals under whose direction this project is being conducted.

Please submit a response to the above list of deficiencies within 15-days of the date of this letter, or by June 7, 1990. Field work associated with this project shall be initiated no later than June 22, 1990. This letter shall serve as approval to postpone the commencement of field work associated with this project, as requested in your correspondence dated May 9, 1990.

Please be advised that the continued failure to submit workplans of sufficient technical scope or which are submitted late, or the future postponement of field work as a result of such late or inadequate submittals, is a violation of California Water Code Section 13267. Such violations will result in the referral of this case to the RWQCB and the Alameda County District Attorney's Office for enforcement action, possibly subjecting the responsible party to civil penalties. Any extensions of stated deadlines must be confirmed in writing by either this Department of the RWQCB.

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

Sincerely,



Scott O. Seery
Hazardous Materials Specialist

SOS:sos

Mr. Randall Stevenson
 RE: former Beacon Station #574, 22315 Redwood Road
 May 21, 1990
 Page 7 of 7

cc: Rafat A. Shahid, Assistant Agency Director, Alameda County
 Environmental Health Department
 Edgar Howell, Chief, Hazardous Materials Division
 Gil Jensen, Alameda County District Attorney's Office
 Mark Thompson, Alameda County District Attorney's Office
 Lester Feldman, RWQCB
 Howard Hatayama, DHS
 Mike Hood, Alameda County Building Inspection Department
 G. Robert Hale, Alameda County Public Works Department
 Bob Bohman, Castro Valley Fire Department
 Leslie Johnson, Esq., Miller, Starr & Regalia
 Richard S. Usher, Ultramar
 Dianne Lundquist, Shell Oil Company
 Paul A. Wilson
 Frederick W. Reyland
 files

P 062 127 934

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to	
Street and No.	
P.O. State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Registered Delivery Fee	
Postage (Return of Showing to Post Office Delivery)	
Postage (Return of Showing to Post Office Address Delivery)	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3800, June 1985

Ultramar

Ultramar Inc.

525 W. Third Street
P.O. Box 466
Hanford, California 93232
(209) 582-0241

May 9, 1990

Mr. Scott Seery
Department of Environmental Health
Alameda County
80 Swan Way, Room 200
Oakland, California 94621

**SUBJECT: LIMITED SUBSURFACE ENVIRONMENTAL INVESTIGATION AT FORMER BEACON
SITE NO. 574, 22315 REDWOOD ROAD, CASTRO VALLEY, CALIFORNIA**

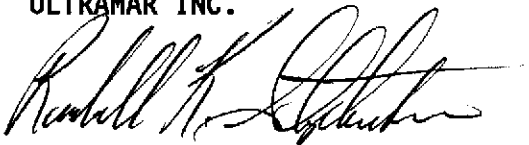
Dear Mr. Seery:

As per our telephone conversation of May 8, 1990, Ultramar requests an extension of the start-up date for the field work related to the above referenced site. The extension is requested pending review of your comments regarding our work plan for this investigation. Your comments will be appropriately addressed, upon receipt of your letter.

Please do not hesitate to contact me if you have any questions regarding this information.

Sincerely,

ULTRAMAR INC.



Randall K. Stephenson
Environmental Specialist

0509ssee



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BEACON
#1 Quality and Service

LAW OFFICES
MILLER, STARR & REGALIA
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

151 UNION STREET
ICE HOUSE TWO
SUITE 300
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE (415) 982-3838

ONE KAISER PLAZA
ORDWAY BUILDING, SUITE 1600
OAKLAND, CALIFORNIA 94612
FACSIMILE (415) 465-1202
TELEPHONE (415) 465-3800

101 YGNACIO VALLEY ROAD
SUITE 401
WALNUT CREEK, CALIFORNIA 94598
FACSIMILE (415) 933-4126
TELEPHONE (415) 935-9400

LESLIE A. JOHNSON
A PROFESSIONAL CORPORATION

April 24, 1990


Mr. Scott Seery
Alameda County Environmental
Health Services Dept.
Hazardous Materials Division
80 Swan Way
Room 200
Oakland, CA 94621

Dear Scott:

Enclosed for your information please find a copy of a
letter which I have written to Richard S. Usher.

Very truly yours,

MILLER, STARR & REGALIA


LESLIE A. JOHNSON

LAJ:vse
Enclosure

LAW OFFICES

MILLER, STARR & REGALIA

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

151 UNION STREET
ICE HOUSE TWO
SUITE 300
SAN FRANCISCO, CALIFORNIA 94111
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FACSIMILE (415) 933-4126
TELEPHONE (415) 935-9400

LESLIE A. JOHNSON
A PROFESSIONAL CORPORATION

April 24, 1990

Richard S. Usher
ULTARMAR, INC.
P.O. Box 93102
Long Beach, CA 90809-3102

Re: 22315 Redwood Road, Castro Valley, California

Dear Mr. Usher:

This letter follows my recent telephone conversation with Scott Seery of the Alameda County Environmental Health Services Department.

Mr. Seery informed me that Beacon's proposed initial assessment plan is completely unacceptable and that he has communicated the same to Randy Stephenson. Among some of the deficiencies mentioned by Mr. Seery were Beacon's failure to employ a registered professional, to include ground water wells, and to submit required fees. Mr. Stephenson can provide you with Mr. Seery's letter setting forth a complete list of deficiencies.

I trust Beacon's submittal of such a grossly inadequate initial assessment plan was due to some general misunderstanding and not a deliberate attempt to avoid its obligations. Nonetheless, I expect that, consistent with the spirit of cooperation you originally communicated in the agreement, immediate steps will be taken toward an expeditious submittal of an acceptable initial assessment plan. If this is not the case, please contact me immediately.

Very truly yours,

MILLER, STARR & REGALIA


LESLIE A. JOHNSON

LHA:tlg

905 Yale Avenue
Modesto, CA 95350-5956
12 March 1990

Mr. Scott O. Seery
Alameda County Health Care Services Agency
80 Swan Way, Room 200
Oakland, CA 94621

Dear Mr. Seery:

Re; Former Beacon Station #574
22315 Redwood Road
Castro Valley

Thank you for the copy of your letter to Mr. Randall Stephenson dated March 8, 1990.

In order that I may keep informed concerning the problem to which your letter relates, it will be greatly appreciated if you will send me copies of any further communications regarding it.

Thanks again for your courtesy.

Very truly yours,

Frederick W. Reyland Jr

Frederick W. Reyland, Jr.

P.S. I gave your letter to my attorney, and he asked that I request you also to send him copies of any further communications.

He is:

*George V. Hartmann
Feldman, Waldman & Kline
146-148 West Weber Avenue
Stockton, CA 95202*

FWR

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Director

Certified Mailer #P 062 127 929

Telephone Number: (415)

March 8, 1990

Mr. Randall Stephenson
Ultramar, Inc.
525 West Third Street
P.O. Box 466
Hanford, CA 93232

RE: REQUEST FOR PRELIMINARY SITE ASSESSMENT PROPOSAL; FORMER BEACON
STATION #574, 22315 REDWOOD ROAD, CASTRO VALLEY, ALAMEDA COUNTY

Dear Mr. Stephenson:

This letter confirms our telephone conversation of March 7, 1990. This conversation followed the receipt in this office of a copy of the February 2, 1990 correspondence addressed to Ms. Leslie Johnson, attorney representing the owner of the referenced real property, Mr. Paul Wilson, from Mr. Richard S. Usher, Vice President and General Council of Ultramar, Inc. The February 2 correspondence indicates that, without waiving any rights as a consequence of such action, Beacon will prepare a preliminary assessment to submit to the local enforcement agency for review and, upon approval of said plan, implement it.

As was previously discussed in the October 27, 1989 correspondence from this office, the referenced site has experienced a "confirmed release" pursuant to the San Francisco Bay Regional Water Quality Control Board (RWQCB) fuel leak criteria. As such, additional investigative work is required to further define the extent of both vertical and lateral impact upon groundwater and soils resulting from the contamination discovered during closure of the underground storage tanks during May 1987. Your attention is directed to the June 25, 1987 Applied GeoSystems document, entitled Report: Environmental Investigation Related to Underground Tank Removal at Former Beacon Station #574, 22315 Redwood Road, Castro Valley, California, for specific information regarding the noted tank closures.

In order to proceed with a site investigation, you should obtain professional services from a reputable environmental/geotechnical consulting firm. Beacon's responsibility is to have the consultant submit for review a proposal outlining planned activities pertinent to meeting the criteria broadly outlined in this letter. Further, the preliminary site assessment must be conducted in accordance with the RWQCB 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.

Mr. Randall Stephenson
RE: 22315 Redwood Road, Castro Valley
March 8, 1990
Page 2 of 3

This preliminary site assessment proposal is due within 30 days of the date of this letter, or by April 8, 1990. Once this proposal has been reviewed and approved, work must commence no later than May 8, 1990.

A report must be submitted within 30 days after completion of the initial phase of work at this site. Subsequent reports are to be submitted quarterly, at a minimum, unless otherwise notified. Such quarterly reports are due the first day of the second month of each subsequent quarter (i.e., August 1, November 1, February 1, and May 1). These reports should describe the status of the investigation and must include, among others, the following:

- Details and results of all work performed during the designated period of time (i.e., records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected, tabulations of free product thicknesses and dissolved fractions, etc.)
- Status of soil and groundwater contamination characterization
- Interpretation of the results (i.e., water level contour maps showing groundwater gradient directions, free and dissolved product plume definition maps for each analyte, etc.)
- Recommendations for additional investigative or remediation work

All proposals and reports must be signed by a California-Certified Engineering Geologist, -Registered Geologist, or -Registered Civil Engineer. Please include a statement of qualifications for each lead professional involved in this project.

All proposals, reports, and analytical results pertaining to this investigation must be sent to this office and to:

Mr. Lester Feldman
Regional Water Quality Control Board, San Francisco Bay
Region
1800 Harrison Street, Suite 700
Oakland, CA 94612

55

Complete items 1 and 2 when additional services are desired, and complete item 3. Put your address in the "RETURN TO" Space on the reverse side. Failure to do so will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

<p>3. Article Addressed to:</p> <p>Mr. RANDALL STEVENSON ULTRAMAR, INC. 525 W. Third St P.O. BOX 464 HANFORD, CA 93232</p>	<p>4. Article Number</p> <p>P 062127 934</p> <p>Type of Service:</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise</p> <p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>
<p>5. Signature - Address</p> <p>X</p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p> <p><i>not paid</i></p>
<p>6. Signature - Agent</p> <p>X <i>Blanche</i></p>	
<p>7. Date of Delivery</p> <p>5-25-90</p>	

PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

55

Complete items 1 and 2 when additional services are desired, and complete item 3. Put your address in the "RETURN TO" Space on the reverse side. Failure to do so will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

<p>3. Article Addressed to:</p> <p>Mr. Randall Stevenson Ultramar, Inc 525 W. Third St Hanford, Ca 93232</p>	<p>4. Article Number</p> <p>P 062128 095</p> <p>Type of Service:</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise</p> <p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>
<p>5. Signature - Address</p> <p>X</p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p>
<p>6. Signature - Agent</p> <p>X <i>Blanche</i></p>	
<p>7. Date of Delivery</p> <p>SEP 21 1990</p>	

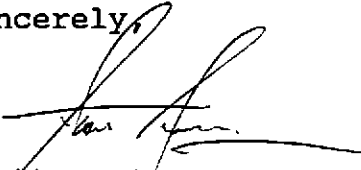
PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

Mr. Randall Stephenson
RE: 22315 Redwood Road, Castro Valley
March 8, 1990
Page 3 of 3

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

To cover our costs for the oversight of this project and review of technical reports and proposals, please remit a check, payable to Alameda County, for \$1116. Should you have any further questions, please call the undersigned at 415/271-4320.

Sincerely,



Scott O. Seery
Hazardous Materials Specialist

SOS:sos

Enclosure

cc: ✓ Rafat A. Shahid, Assistant Agency Director, Alameda County
Department of Environmental Health
Gil Jenson, Alameda County District Attorney, Consumer and
Environmental Protection Division
Mark Thompson, Alameda County District Attorney, Consumer and
Environmental Protection Division
Lester Feldman, RWQCB
Howard Hatayama, DHS
Mike Hood, Alameda County Building Inspection Department
G. Robert Hale, Alameda County Public Works Agency
Bob Bohman, Castro Valley Fire Department
Leslie Johnson, Esq., Miller, Starr & Regalia
Richard S. Usher, Ultramar, Inc.
Dianne Lundquist, Shell Oil Company
Paul A. Wilson
Frederick W. Reyland
files

U.S.
62 127 929

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to	
Street and No.	
P.O., State and ZIP Code	
Postage	5
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt, Allowing Postmark and Date Delivered	
Return Receipt, Allowing Postmark, Date, and Address of Delivery	
TOTAL Postage and Fees	5
Postmark or Date	

PS Form 3800, Jan 7, 1983

S.S.

SENDER: Complete items 3 and 4. and 2 when additional services are requested and complete items 5 and 6. Put your address in "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check boxes for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: MR. RANDALL STEPHENSON ULTRAMAR INC 525 W. THIRD ST P.O. BOX 406 HANFORD, CA 93232	4. Article Number
5. Signature - Address X	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature - Agent X <i>Blank</i>	Always obtain signature of addressee or agent and DATE DELIVERED.
7. Date of Delivery MAR 12 1990	8. Addressee's Address (ONLY if requested and fee paid) <i>Not paid</i>

LAW OFFICES

MILLER, STARR & REGALIA

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151 UNION STREET
ICE HOUSE TWO
SUITE 300
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE (415) 982-3838

ONE KAISER PLAZA
ORDWAY BUILDING, SUITE 1600
OAKLAND, CALIFORNIA 94612
FACSIMILE (415) 465-1202
TELEPHONE (415) 465-3800

101 YGNACIO VALLEY ROAD
SUITE 401
WALNUT CREEK, CALIFORNIA 94596
FACSIMILE (415) 933-4126
TELEPHONE (415) 935-9400

LESLIE A. JOHNSON
A PROFESSIONAL CORPORATION

February 21, 1990

90 FEB 26 PM 12:58

Mr. Richard S. Usher
Vice President and General Counsel
Ultramar
P. O. Box 93102
Long Beach, California 90809-3102

Re: 22315 Redwood Road, Castro Valley, California

Dear Mr. Usher:

Enclosed please find a copy of your letter of February 2, 1990 which has been executed to indicate agreement that Ultramar proceed on the basis that neither party is waiving any rights by virtue of such action. We trust you will keep us fully informed as to your findings and plans.

Very truly yours,

MILLER, STARR & REGALIA


LESLIE A. JOHNSON

LAJ:vse
Enclosure
cc: Paul Wilson
Scott Seery

PROJECT # 450246

ALAMEDA COUNTY HEALTH
ENVIRONMENTAL HEALTH DEPT.

SERVICE REQUESTED: removal and installation

NAME OF SITE: Tulloch Const STID: _____

ADDRESS: 3428 Etta St
Oakland 94601

CONTRACTOR: Pearson Equipment & Maintenance

ADDRESS: 614 W. Julian Ave TELE # _____
San Jose 95126

CONTACT PERSON: Brian Tulloch TELE # 655-3400

AMOUNT OF DEPOSIT: \$ 450.00 DATE: 4/6/88

DATE:	ACTION TAKEN	TIME	HRS. IN	0.1 X \$53.00 =	BALANCE
		IN	OUT	X \$53.	
	OVERHEAD 25%			112.50	\$ 337.50
4/22/88	Review Plan + letter	4:15	4:45	13.25	324.25
4/15/88	Notified Dale Pearson	10:00	10:15	13.25	311.00
11/28/88	Plan accepted TO Mary for accounts				

TOTAL COST \$ _____

PROJECT COMPLETED BY _____

DATE: _____ REFUND: \$ _____
SENT TO ACCOUNTING: DATE: 2/14/90

TO BE REPORTED WEEKLY TO ACCOUNTING FOR CASH FLOW
ADJUSTMENT

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)

FACSIMILE TRANSMITTAL

TO:

465-1202 Floor/Room # _____
Fax Phone Number

Name: Leslie A. Johnson Title/Section _____

Agency: Miller, Starr & Regalia

Address: One Kaiser Bldg, Ste. 1600

Phone #: () 465-3800

FROM:

_____ Floor/Room # _____
Fax Phone Number

Date: 12/20/90 Time Sent: 2:10

Sender: Scott Seery Title/Section _____

Phone #: () 271-4320

Number of Pages Including Transmittal Sheet: 2

Special Instructions/Comments:

As discussed, here's the Dec. 13 correspondence from Ultramar.

Ultramar

Ultramar Inc.
P.O. Box 93102
Long Beach, California 90809-3102
(213) 495-5300 Corporate Office
(213) 437-6795 Refinery Operations

February 2, 1990

Ms. Leslie A. Johnson
Miller, Starr & Regalia
One Kaiser Plaza
Ordway Building, Suite 1600
Oakland, California 94612

Reference: 22315 Redwood Road
Castro Valley, California

Dear Ms. Johnson:

This letter will respond further to the recent correspondence concerning the above location. We have reviewed the Lease and Agreement for Termination of the Lease. We do not find in those documents the clear understanding of obligations by Beacon to your client which you most enthusiastically support.

It does not appear that Beacon and Mr. Wilson had a lease agreement and the Lease provisions only apply to the extent they are incorporated in the Termination Agreement. In addition, the negotiations for the Termination Agreement resulted in the removal of extensive language detailing proposed remediation obligations by Beacon. Your interpretation of the Agreement seeks to reimpose terms clearly not agreed to by the parties.

The specific Lease provisions to which you refer require Beacon to remove structures and tanks, remove rubble, and backfill and compact the soil. All this was done. The attempt to interpret the term "clean" to mean environmentally remediated to an unspecified level is unwarranted. It is apparent the term "clean" refers to the absence of debris from demolition activity and not to all future levels of contamination which may be imposed by an agency.

Finally, there is a clear question of the source of any contamination. Beacon operated at the site between 1981



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BEACON
#1 Quality and Service

Ms. Leslie A. Johnson
February 2, 1990
Page 2

and 1987, while the location was previously operated as a station for many years. At the time Beacon acquired the site and again in 1986, tank tests showed the tanks and lines were not leaking. In addition, leak detectors were placed on the lines. The evidence indicates that the equipment was in good repair and not leaking during Beacon's tenure. As such, Beacon does not appear to be the cause of any contamination and its obligation to remediate contamination is not apparent.

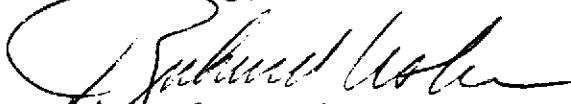
where are
results?

Beacon is, however, willing to cooperate in an effort to obtain further information and avoid action by the agency which will not be beneficial to either party. Therefore, without any acknowledgment of liability and without waiving any party's rights, and specifically any rights to seek reimbursement or recovery of expenses from the other party, Beacon will undertake to prepare the initial assessment plan and, if that plan is approved, implement it. Once an assessment delineates the situation, we believe the parties will be better able to address the issues.

If you and your client agree with our proposed plan of action in the above paragraph, please indicate by signing the enclosed copy of this letter and returning it.

If you have any questions, please contact me.

Sincerely,



Richard S. Usher
Vice President
and General Counsel

RSU:scs

AGREED:



February 22, 1990
Date

LAW OFFICES

MILLER, STARR & REGALIA

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

101 UNION STREET
ICE HOUSE TWO
SUITE 300
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE (415) 988-3838

ONE KAISER PLAZA
ORDWAY BUILDING, SUITE 1600
OAKLAND, CALIFORNIA 94612
FACSIMILE (415) 465-1202
TELEPHONE (415) 465-3800

101 YGNACIO VALLEY ROAD
SUITE 401
WALNUT CREEK, CALIFORNIA 94598
FACSIMILE (415) 933-4126
TELEPHONE (415) 933-9400

LESLIE A. JOHNSON
A PROFESSIONAL CORPORATION

Date: January 10, 1990

Time: 2:15

To: Scott Seery

Company: Alameda County Environmental Health
Services Department - Hazardous Materials Division

Fax No.: 568-3706

From: LESLIE A. JOHNSON
MILLER, STARR & REGALIA, OAKLAND OFFICE

Fax Number: (415) 465-1202

MSR Billing: WLSP/29018

If you do not receive 12 pages, including this cover sheet,
please contact Susan Elwell at (415) 465-3800, extension 451.

Documents transmitted herewith are as follows:

Lease

Agreement for Termination of Lease

LEASE

This lease, made and entered into this 31st day of August, 1981, by and between Frederick W. Reyland, Jr., and Miriam Rose Reyland, his wife, as LESSORS, and Beacon Oil Company, a Nevada corporation, with its principal place of business located at 525 West Third Street, in the City of Hanford, County of Kings, State of California, as LESSEE.

WITNESSETH:

That LESSORS lease unto LESSEE the following described premises in the County of Alameda, State of California, more particularly described as follows:

PORTIONS of lots 1, 4 and 5 in block A, as said lots and block are shown on the map of "Resubdivision of blocks A and B, Knox Tract, Eden Township, Alameda County, California", filed June 5, 1902 in the office of the County Recorder of Alameda County, described as follows:

BEGINNING at a point in the southern line of said lot 5 distant thereon south 82° 21' 05" west 12.45 feet from the intersection thereof with the western line of the County Road to Castro Valley, now known as Redwood Road, as said County Road is shown upon the map hereinabove referred to, and running thence along said southern line south 82° 21' 05" west 139.50 feet to the western line of said lot 5; thence along the last named line and along the western line of said lots 1 and 4, north 7° 38' 55" west 147.34 feet to a line drawn parallel to and 10 feet southerly, measured at right angles, from the southern line of Laurel Avenue, now known as Grove Way, as said Laurel Avenue is shown upon the map hereinabove referred to; thence along said parallel line south 87° 15' 55" east 129.65 feet; thence tangent with the last named line along a curve to the right with a radius of 30 feet, southeasterly, southerly and southwesterly, an arc distance of 45.76 feet; and thence tangent with the last described course south 0° 07' 30" west 91.26 feet to the point of beginning.

More commonly known as: 22385 Redwood Road, Castro Valley, California - southwest corner of Redwood Road and Grove Way.

1. TERM. The term of the lease on the demised premises shall be for a period of eight (8) years, beginning September 1, 1981 and terminating August 31, 1989.

2. RENT. Monthly rent for the first eight (8) years beginning September 1, 1981, will be as follows:

First	(1st)	year	\$1100.00 monthly
Second	(2nd)	year	\$1155.00 monthly
Third	(3rd)	year	\$1212.75 monthly
Fourth	(4th)	year	\$1273.39 monthly

Fifth	(5th)	year	\$1337.06 monthly
Sixth	(6th)	year	\$1403.91 monthly
Seventh	(7th)	year	\$1474.11 monthly
Eighth	(8th)	year	\$1547.82 monthly

Handwritten notes:
 5/18/85-6/1/86
 3/1/87

"Rent is due and payable in advance on or before the 1st day of each month for the duration of said lease, and shall be remitted in the full amount without demand therefor to Frederick W. Reyland, Jr. at Modesto, California, or such other place as he may direct, at the times herein specified."

3. OPTION TO RENEW. LESSEE shall have the right and option to extend the term of this lease for one additional term of five (5) years from and after the date of expiration hereof upon the following terms:

(a) LESSEE shall give notice in writing to LESSORS of the election to exercise its said option to extend the lease for a further term of five (5) years, not later than ninety (90) days prior to the date of expiration of the lease;

(b) Except for the amount of rent to be paid by LESSEE to LESSORS, all of the terms and conditions of this lease shall continue in effect during such extended term of five (5) years.

(c) LESSORS and LESSEE shall endeavor to agree upon the amount of rent to be paid by LESSEE during such extended term. If within thirty (30) days after the giving of notice of election to extend the lease, the parties are unable to agree upon the amount of rent to be paid, then the rent shall be fixed as follows: Within five (5) days after expiration of the aforesaid thirty (30) day period, LESSORS, at their own cost and expense, and LESSEE at his own cost and expense, shall each select a qualified real property appraiser, and said appraisers shall confer and determine the true market value of the land comprising the leased premises at the date of expiration of the lease. If said appraisers are unable to agree upon such market value within fifteen (15) days after their selection, they shall select a third qualified appraiser and the market value of the land comprising the leased premises shall be determined by the agreement of any two of said appraisers. The cost of the third appraiser shall be shared equally by LESSORS and LESSEE. The monthly rent for such extended term shall then be fixed at 1.0 per cent (.010%) of the market value of the land comprising the leased premises as fixed by the appraisers, but in no event shall said monthly rent be less than

Handwritten notes:
 June
 27/85
 WBS

*Just
will
Just
will
Just
will
Just
will*

SIXTEEN HUNDRED TWENTY-FIVE DOLLARS AND TWENTY-ONE CENTS
 (\$1625.21) per month for the first year, ~~FOURTEEN HUNDRED SEVENTY-~~
~~FOURTY-SEVEN CENTS (\$1706.47)~~ SEVENTEEN HUNDRED SIX DOLLARS AND
~~FIVE DOLLARS (\$1475.00)~~ for the second year, SEVENTEEN HUNDRED NINETY-ONE
 DOLLARS AND SEVENTY-NINE CENTS (\$1791.79) FIFTEEN HUNDRED FIFTY
~~DOLLARS (\$1450.00)~~ for the third year, EIGHTEEN HUNDRED EIGHTY-ONE
 DOLLARS AND THIRTY-EIGHT CENTS (\$1881.38) SIXTEEN HUNDRED TWENTY-SIX
~~DOLLARS (\$1625.00)~~ for the fourth year, and NINETEEN HUNDRED SEVENTY-FIVE
 DOLLARS AND FORTY-FIVE CENTS (\$1975.45) SEVENTEEN HUNDRED DOLLARS
~~DOLLARS (\$1700.00)~~ for the fifth year. Said rent shall be paid monthly in advance,
 as in the lease provided.

4. TAXES. The LESSEE hereby agrees to pay all taxes and assessments levied upon and constituting a lien against the said demised premises during the entire term of this lease, same to be paid when due. LESSORS will assume any tax increase resulting from an action of LESSORS that causes the property to be assessed at an increased value or revises the ownership which causes a reassessment of property values.

5. UTILITIES. The LESSEE, as further consideration for said lease, hereby agrees to pay all charges for water, gas, electricity, and all other utilities furnished to the premises during the term of this lease.

6. DEFAULTS AND PENALTIES. Should any payment required hereunder not be made when due, or if default should be made in any of the covenants herein contained, the LESSORS or their representative or agent, may re-enter said premises and remove all persons therefrom and may at their option, forthwith declare, after such default, the said lease terminated and all rights of the LESSEE shall thereupon cease.

7. ASSIGNMENT/SUBLEASING. The LESSEE shall have the right to assign or sublet the whole or any part of the leased premises without the consent of the LESSORS. Such right to assign and/or sublet shall not relieve the LESSEE from responsibility for the payment of rent or compliance with all terms and conditions of this lease.

"LESSEE, however, shall not suffer or permit any assignment of this lease, or any rights hereunder, by operation of law or by any process or proceedings of any court, or by attachment, execution, proceedings in insolvency or bankruptcy either voluntary or involuntary; and in any such event, LESSORS, at their option and without notice, may terminate this lease."

8. IMPROVEMENTS, OWNERSHIP AND REMOVAL. It is understood and agreed that Beacon Oil Company is purchasing from Shell Oil Company all improvements on the demised premises, including building, canopy, tanks,

plumbing, electrical fixtures, and wiring, equipment and surfacing. Any improvements and building or equipment which have been placed on the leased premises by Shell Oil Company, or which may be placed on said premises by LESSEE during the term of this lease or any extension or renewal thereof, shall be and remain the property of the LESSEE, it being the intent of the parties that this shall be a ground lease. Upon the expiration of the term of this lease or any extension or renewal thereof, the LESSEE shall within a reasonable time thereafter, not to exceed sixty (60) days, remove all of the aforesaid improvements and equipment. Further upon such removal the LESSEE shall fill, back-fill, and tamp and compact all excavations and holes, and restore and leave the premises in substantially the same condition as they were before such improvements were placed thereon. It is the intention of the LESSOR and LESSEE that the condition of the land be clean and level and that the surface of the land be capable of supporting the foundation of a new structure without need for special foundations, footings, or support structures.

9. WAIVER OF COVENANTS. It is agreed that the waiver by the LESSORS of any covenant herein contained shall not defeat the same, or prevent the strict enforcement of that or any other covenant. Waiver of rights to proceed with legal action as to any breach of covenant shall be deemed only a waiver as to the single breach and shall not be deemed a waiver as to future breaches thereof.

10. INSURANCE. LESSEE shall hold LESSORS harmless for any damages to persons or property occurring in or on the demised premises or as shall have resulted to any damage to any persons or properties, as a result of LESSEE'S activities on said premises, and shall maintain public liability and property damage insurance in amounts of not less than ONE MILLION DOLLARS (\$1,000,000.00) each, and shall provide LESSORS with certificates of insurance.

11. PURCHASE REFUSAL. If, at any time during the term of this lease or any extension or renewal thereof the LESSORS shall receive from a ready, willing and able purchaser a bona fide offer to purchase the leased premises; or if the LESSORS should make an offer to sell the leased premises or any part thereof to such a purchaser, LESSORS shall give the LESSEE a written notice setting forth the name and address of the prospective

purchaser and the price and terms of the offer. LESSEE shall then have the prior option to purchase the leased premises, or the part thereof covered by such an offer, at the price, and on the terms of such offer. LESSEE may exercise such option by giving LESSORS written notice within fifteen (15) days after receipt of LESSORS' notice of the offer. A sale by the LESSORS of all or any portion of the leased premises, other than a sale to the LESSEE, shall be subject to all terms and conditions of this lease which shall remain in full force and effect despite such change of ownership, until the expiration or termination thereof.

12. EMINENT DOMAIN. In the event any governmental agency, including City, County or State, takes any of the demises premises for use as roadway or any other purposes, thus depriving LESSEE use thereof, or permanently restricts egress or ingress, then LESSEE herein shall have the right to reach agreement with the LESSORS to reduce the monthly rent or to terminate the within lease by giving LESSORS thirty (30) days' notice in writing of its intention to so terminate. Any such notice to terminate must be given within sixty (60) days after the effective date of the condemnation or the right to terminate said lease shall be deemed waived.

Any compensation paid or to be paid by a public agency for the taking or damaging of the land constituting the leased premises, including but not limited to any severance damages, shall belong to and be retained by the LESSORS. Any such compensation paid or to be paid by a public agency for the taking or damaging of buildings or other improvements which are the property of the LESSEE shall belong to and be retained by the LESSEE.

13. NOTICES. All notices in writing herein provided to be given, or which may be given by either party to the other, shall be deemed to have been fully given when deposited in the United States mail, registered, with postage thereon prepaid, addressed to the LESSORS at 905 Yale Avenue, Modesto, California, 95350 and to the LESSEE at 525 West Third Street, Hanford, California 93230. The address to which said notices shall or will be mailed as aforesaid to either party may be changed by written notice given by such party to the other as hereinbefore provided. However, nothing herein provided shall preclude the giving of such notice by personal service.

14. NOTICE OF WORKS OF IMPROVEMENT. LESSEE shall give written notice to LESSORS at least five (5) days before commencing any work

of remodeling or removing any existing improvements on the leased premises, placing or erecting any new structures thereon, or making any changes, repairs or alterations in the leased premises or improvements thereon at any time during the term of this lease or any extension or renewal thereof. It is the intention of the LESSORS, in accordance with the California Code of Civil Procedure to post and record a Notice of Nonresponsibility for any such work undertaken by the LESSEE.

15. LIENS/ATTACHMENTS. LESSEE shall not suffer or permit any mechanic's, materialman's or other lien, or any attachment to be filed or placed on the leased premises, and should any such lien or attachment be so placed or filed upon the same, the filing thereof shall constitute a breach of the provisions of this lease; and in any such event LESSORS may, at their option, without notice terminate this lease. However, if the LESSEE in good faith disputes the claim out of which such lien or attachment arises, and discharges the same of record within ten (10) days after the date of such filing, then LESSORS may not terminate this lease as hereinbefore in this paragraph permitted.

16. WASTE, NUISANCE AND/OR UNLAWFUL USE. LESSEE shall keep and maintain the leased premises in a clean and sanitary condition, and shall not commit, or suffer to be committed, any waste upon the leased premises. LESSEE shall not use, or permit the use of, all or any part of the leased premises for any purpose, or cause or permit the existence of any condition that will constitute or give rise to any nuisance, or will be contrary to or in violation of any present or future ordinance, law, rule or regulation of the county, state or federal government, or any agency or authority thereof.

17. CARE AND REPAIR OF LEASED PREMISES. The taking possession of the leased premises by the LESSEE shall of itself constitute acknowledgement by it that the leased premises are in a good and usable condition. LESSEE during the entire term of this lease and any extension or renewal thereof, shall at its own expense, keep the leased premises, including all sidewalks, driveways, underground tanks and pipes, sanitary plumbing and similar installations in good condition and repair, making any and all necessary repairs and replacements thereof. LESSEE specifically waives the right to make any repairs, alterations or improvements on or to the leased

premises at the cost or expense of the LESSORS. LESSORS are not obligated to make any repairs whatever to the leased premises.

18. SURRENDER OF PREMISES ON EXPIRATION OF LEASE.

On the last day of the term or any extension or renewal hereof, or the sooner termination of this lease, LESSEE shall peaceably and quietly leave, surrender and yield up to the LESSORS the leased premises in good order, condition and repair, and with all improvements and equipment removed as hereinbefore provided.

19. HOLDING OVER. If LESSEE holds possession of the leased premises after the term or any extension or renewal of this lease has expired, said LESSEE shall become a tenant from month to month upon the same terms and at the same monthly rental as is in effect at the date of such expiration, payable monthly in advance in lawful money of the United States of America on the 1st day of each month. Should LESSOR desire to lease the premises to another party, LESSEE shall have the first right of refusal to meet the bona fide lease offer from the other party.

20. NON-LIABILITY OF LESSORS. LESSORS shall not be liable nor accountable for any expenses or liabilities incurred by LESSEE in the leased premises, nor shall LESSORS be liable or accountable for damage or injuries sustained by LESSEE, or its property, or by third persons or their property in or about the leased premises whether occasioned by fire, water, flood, accident, the elements, acts of God or any other cause or causes whatsoever.

21. ATTORNEYS' FEES. If either the LESSORS or the LESSEE shall be successful in enforcing against the other any remedy, legal or equitable, for the breach of any of the provisions or covenants of this lease, including any action brought for the collection of unpaid rent, there shall be included in the judgment or decree of the successful party an award for reasonable attorneys' fees and court costs to be fixed by the court.

IN WITNESS WHEREOF, LESSORS have set their hands the day and year in this indenture of lease first above written, and LESSEE has caused this instrument to be executed by its proper officer.

LESSORS:

Frederick W. Keyland, Jr.
Frederick W. Keyland, Jr.

Miriam R. Keyland
Miriam R. Keyland

BEACON OIL COMPANY.....LESSEE

By Walter A. Dwelle
Walter A. Dwelle
Senior Vice President

Dated: This 31st day of August, 1981.

Carlene Walker
Witness

AGREEMENT FOR TERMINATION OF LEASE

THIS AGREEMENT FOR TERMINATION OF LEASE (the "Agreement") is made this _____ day of December, 1986, by and between BEACON OIL COMPANY, a Nevada corporation, with its principal place of business located at 525 West Third Street in the City of Hanford, County of Kings, State of California (herein "Beacon") and PAUL A. WILSON, an individual (herein "Wilson").

RECITALS:

This Agreement is made with reference to and reliance upon the following facts:

A. Frederick W. Reyland, Jr. and Miriam Rose Reyland (herein "Lessors") and Beacon, as lessee, are parties to that certain Lease dated August 31, 1981 (the "Lease") pertaining to certain real property commonly identified at 22315 Redwood Road, Castro Valley, California and more particularly described in the Lease (the "Property").

B. Wilson is in the process of acquiring the Property, and in the event Wilson does so acquire the Property, the parties hereto wish to terminate the Lease on the terms and conditions set forth herein.

ACCORDINGLY, in consideration of the mutual covenants set forth herein and other adequate consideration, the parties hereto agree as follows:

1. TERMINATION OF LEASE: Beacon and Wilson hereby agree that, subject to the terms of this Agreement, the term of the Lease shall terminate as of March 30, 1987 (the "Termination Date"). Lessee shall continue to pay all rental, including without limitation payment of monthly rent, taxes, utilities and insurance as specified in the Lease and shall perform all obligations in full under the Lease to and including the Termination Date. The monthly rent, taxes, utilities and, if Wilson retains it, the insurance shall be prorated as of the Termination Date.

Termination of the Lease shall not, however, release Beacon from the obligations set forth in Paragraph 8 of the Lease nor from any indemnities under the Lease, including without limitation, the indemnity set forth in Paragraph 20 of the Lease.

Beacon shall terminate all sub-leases and sub-tenancies in effect as of the Termination Date as specified. Beacon shall bear all responsibility, liability and cost for so terminating sub-leases and sub-tenancies, including all costs of evicting any parties. Beacon shall indemnify and agree to hold Wilson harmless from any claim, damage, cost, or liability resulting

from or in any way arising out of such termination of any sub-lease or sub-tenancy.

Upon such termination of the Lease, Beacon shall execute and deliver to Wilson a quitclaim deed and such other documents, in recordable form and in a form and substance acceptable to the title company who issued title insurance to Wilson on his acquisition of the Property, as may be necessary to obtain an endorsement to or update of Wilson's title insurance policy showing title to the Property free and clear of the Lease and all interests thereunder. Wilson shall prepare and deliver any such documents to Beacon.

2. REMOVAL OF IMPROVEMENTS: Immediately upon termination of the Lease, Beacon shall remove all of Beacons's property and improvements, gasoline tanks, pumps, plumbing and wiring and leave the Property in a clean and usable condition in accordance with the terms of Paragraph 8 of the Lease and any other provisions of the Lease applicable thereto. All such work shall be performed at Beacon's sole expense in accordance with the terms of this Lease.

3. CONDITION PRECEDENT TO AGREEMENT: The effectiveness of this Agreement is specifically conditioned upon the acquisition by Wilson of the Property on or before December 31, 1986. If a grant deed to the Property has not been delivered to Wilson by recordation in the Recorder's Office of Alameda County on or before said date, this Agreement shall immediately terminate and be of no further force or effect between the parties hereto.

4. WAIVER OF FIRST RIGHTS OF REFUSAL: Beacon hereby agrees that effective upon Wilson's acquisition of the Property, the option to renew set forth in Paragraph 3 of the Lease, the purchase right set forth in Paragraph 11 of the Lease, and the lease right set forth in Paragraph 19 of the Lease shall be of no further force or effect. Beacon further waives any and all rights it may have under any of such provisions of the Lease in connection with Wilson's acquisition of the Property.

5. ATTORNEYS FEES: In the event either party hereto commences legal action or arbitration proceedings to interpret, enforce or obtain damages under this Agreement, the prevailing party shall be entitled to recover reasonable attorneys' fees, court costs, arbitration costs and discovery costs against the other as may be awarded by the court.

6. TIME OF THE ESSENCE: Time is of the essence in the performance of each and every term and condition of this Agreement.

7. BINDING: This Agreement shall be binding upon the parties hereto, their successors in interest, assigns, heirs and representatives.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement on the respective dates set forth below, effective as of the date first above written.

Beacon: BEACON OIL COMPANY, a Nevada Corporation

By: _____

Its: _____

Date: _____

Wilson:

PAUL A. WILSON

Date: _____

LAW OFFICES

MILLER, STARR & REGALIA

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ONE KAISER PLAZA

ORDWAY BUILDING, SUITE 1600

OAKLAND, CALIFORNIA 94612

FACSIMILE (415) 465-1202

TELEPHONE (415) 465-3800

151 UNION STREET
ICE HOUSE TWO
SUITE 300
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE (415) 982-3838

90 JAN 10 AM 10:19
YGNACIO VALLEY ROAD
SUITE 401
WALNUT CREEK, CALIFORNIA 94596
FACSIMILE (415) 933-4126
TELEPHONE (415) 933-9400

LESLIE A. JOHNSON
A PROFESSIONAL CORPORATION

January 8, 1990

Randy Stephenson
Beacon Oil Company
P. O. Box 466
Hanford, California 93232

Re: 22315 Redwood Road, Castro Valley

Dear Mr. Stephenson:

This firm represents Mr. Paul Wilson, the owner of the real property located at 22315 Redwood Road, Castro Valley, California (the "Property"). I understand that Mr. Scott Seery of the Alameda County Environmental Health Services Department, Hazardous Materials Division, has recently contacted you with regard to this Property. It is further my understanding that Mr. Seery claimed that there is a need to remove certain toxic substances from the Property and/or to insure that no such substances are present, but that Beacon Oil Company has taken the position that it has no responsibility to take any such action. We believe that Beacon Oil Company has a clear legal and contractual obligation to comply with the requests of Mr. Seery and we hereby demand that Beacon Oil Company immediately comply with the requests of the Alameda County Environmental Health Department.

Our client acquired this property on or about December 11, 1986. At that time, the property was subject to a Lease dated August 31, 1981, entered into by Frederick W. Reyland, Jr. and Marian Rose Reyland, as lessors, and Beacon Oil Company, as lessee (the "Lease"). In connection with Mr. Wilson's acquisition of the Property, the Reylands, Mr. Wilson, and Beacon Oil Company entered into an Agreement for Termination of Lease dated December 6, 1986 (the "Termination Agreement"). I trust you have copies of both the Lease and the Termination Agreement, but if you do not, I will be happy to furnish those to you.

Pursuant to the terms of the Lease and the Termination Agreement, it appears quite clear that Beacon Oil Company bears full responsibility for any and all action which is or may be required with regard to the presence of petroleum or other

Randy Stephenson
Beacon Oil Company
January 8, 1990
Page 2

contamination of the Property. In specific, I call your attention to Paragraph 8, 10, 16, 17, 18 and 20 of the Lease and Paragraphs 1 and 2 of the Termination Agreement.

Under Paragraphs 1 and 2 of the Termination Agreement, Beacon Oil Company retained all obligations under, specifically, Paragraphs 8 and 20, and otherwise pertaining to indemnity of the landlord. Paragraph 2 of that Termination Agreement clearly reiterates Beacon Oil Company's obligation to remove the improvements, gasoline tanks, etc. and to leave the Property in a clean and usable condition.

Under the relevant provisions of the Lease itself, which as noted are fully reiterated by the Termination Agreement, Paragraph 8 of the Lease confirms ownership of all improvements, including the tanks, as that of Beacon Oil Company. It further requires that upon termination of the Lease Beacon Oil Company must remove the improvements and fill and restore the land to the same condition as existed before improvements were placed thereon. The Lease continues to mandate a "clean" condition. Paragraph 10 specifies that the lessee, Beacon Oil Company, will hold the landlord harmless from any damages arising out of lessee's activities. Paragraph 16 requires Beacon Oil Company to maintain the land in a "clean and sanitary condition" and prohibits waste or any use which would give rise to a nuisance or which would be in violation of any present or future law, rule, or regulation, etc. Paragraph 17 requires that Beacon Oil Company keep the land and all of the improvements in good condition and repair. Paragraph 18 requires that upon termination of the Lease, the land will be turned over in "good order, condition and repair, and with all improvements and equipment removed". Paragraph 20 reiterates that the landlord will not be liable for any expense or liability incurred by lessee with regard to the Property. Each and every one of the above-described Paragraphs independently places on Beacon Oil Company the responsibility for action. Read together, the meaning of the Lease and Termination Agreement is abundantly clear.

Based on the above I am shocked that Beacon Oil Company would attempt to deny its responsibility with regard to this Property. You might also wish to note that the Lease contains an attorneys' fees provision so that in addition to the liability which Beacon Oil Company has already incurred, further inaction will increase its liability to include reimbursement of attorneys' fees incurred by my client with regard to this matter.

Given the clear contractual obligations, not to mention statutory liability, I trust there has been some misunderstanding

Randy Stephenson
Beacon Oil Company
January 8, 1990
Page 3

with regard to the intended action of Beacon Oil Company. If that is not the case, and Beacon Oil Company continues to deny the existence of its contractual obligations, as well as its statutorily imposed obligations, you may rest assured that our client will pursue his rights against Beacon Oil Company for recovery based on contract and such other recovery as may be appropriate arising out of the inexplicable and egregious action by Beacon Oil Company in denying its obligations. Accordingly, I expect a quick and cooperative response from you and Beacon Oil Company. I would also appreciate being advised as to the identity of the parties in the Beacon Oil Company Legal Department with whom I should be dealing.

Very truly yours,

MILLER, STARR & REGALIA



LESLIE A. JOHNSON

LAJ:vse

cc: Paul Wilson
Scott Seery,
Alameda County Environmental
Health Services Department
Mark Thompson,
Alameda County District Attorneys' Office

MEMO to file:

old owner:

80 y.o.

Frederick
Fr W. Rayland
905 ~~Fale~~ St.
Modesto, CA

1-209-523-4033

Deputy P.A., under Earl
Wilson

Sold to: deed ^{dated} Dec. 1, 1986

Paul A. Wilson, a married man
1238 Stanyan St.
S.F. 94117

564-2733

Founders Title Co.

Order # for Escrow: 962180 CA

S.L. office, Title Operations 633-7600

- buyer
- Beacon had an agreement to leave property in "clean and useable condition", as did Shell
- never heard anything about contamination at time of sale

→ Dianne Lingquist, Shell

- gather info for site

- was or presently owned by Shell? Beacon?

- remediation effort ^{not} made?

current owner, Shell and/or Beacon

Beacon Station #0574
22315 Redwood
C. V.

MEMO to file: PHONE LOG

12-21-89

Beacon took over the property in 1982. The property was previously leased by Shell up until that time. Shell purportedly owned the improvements (ie, tanks, pipes, structures), but not the property itself. Beacon, when taking over the lease in 1982, assumed/purchased (?) those improvements from Shell. (This according to ~~Darryl~~ Stephenson of Ultramar.)

I asked Mr. Stephenson whether or not the property owner was made aware of the "problem" at the site as addressed in The 25 Jun 87 AGS report. He said he didn't know. He also did not know who the property owner was at that time (1987) or if the property is still owned by same or a different individual or corporation.

I requested that he find out the answers to these questions.

Ultramar

Ultramar Inc.
525 W. Third Street
P.O. Box 466
Hanford, California 93232
(209) 582-0241

89 DEC 18 AM 10:41

December 15, 1989

Mr. Scott Seery
Department of Environmental Health
Alameda County
80 Swan Way, Room 200
Oakland, California 94621

RE: Former Beacon Station No. 574, 22315
Reedwood Road, Castro Valley CA

Dear Mr. Seery:

A review of our file regarding the above referenced site indicates that Beacon Oil Company (Beacon) has not at any time had an ownership interest in this property. Beacon operated the station under a lease agreement with the previous owner until it was sold in 1987. At that time, Beacon terminated its lease and removed all of the improvements, both surface and subsurface, in accordance with the lease provisions.

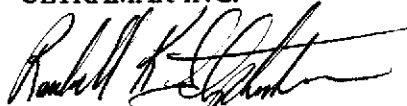
great approach!

We believe environmental investigations are the responsibility of the current and past owners of the property and suggest that you contact them directly concerning any matters pertinent to this site.

If you have any questions regarding this letter, please contact me.

Sincerely,

ULTRAMAR INC.



Randall K. Stephenson
Environmental Specialist



A Member of the Ultramar Group of Companies

BEACON
#1 Quality and Service

YUBA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Certified Mailer #P 062 127 696

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 100
Oakland, CA 94612
(415)

October 27, 1989

Mr. Randy Stevens
Ultramar Company
525 West Third Street
Hanford, CA 93230

RE: FORMER BEACON STATION #0574, 22315 REDWOOD ROAD,
CASTRO VALLEY, CALIFORNIA

Dear Mr. Stevens:

This letter follows our telephone conversations on September 28 and October 26, 1989 during which we discussed the current status of site assessment and remediation activities at the referenced site. As you will recall, four (4) fuel and one (1) waste oil tanks were removed from this site on May 5, 1987.

A report issued from Applied GeoSystems (AGS) dated June 25, 1989 identifies substantial impact to soils by fuel hydrocarbons as indicated by laboratory analyses performed upon soil samples collected at the time of closure. Additional soils were excavated from the most highly contaminated areas of the site on May 18, 1987 to a maximum depth of approximately 20 feet at which point, due to mechanical limitations of the excavator used, further excavation ceased. Latent contamination, to nearly 2000 ppm as total volatile hydrocarbons, remains at depth beneath the site.

The cited AGS report contained a recommendation that further work be performed to assess the impact, if any, upon groundwater through the installation and monitoring of an

Mr. Randy Stevens
RE: Former Beacon SS#0574
22315 Redwood Rd.
Castro Valley
October 27, 1989
Page 2 of 3

appropriate number of groundwater wells. This recommendation reflects this site's "confirmed release" status which is based upon the presence of soils contaminated with total petroleum hydrocarbons in excess of 1000 ppm, in accordance with the San Francisco Bay Regional Water Quality Control Board (RWQCB) fuel leak criteria.

As a result of this site's "confirmed release" status, additional investigative work was and is required to be performed to further define the extent of both vertical and lateral impact upon groundwater and soils resulting from the noted contamination. The information gathered by this investigation is used to determine an appropriate course of action to remediate the contamination and to help assess the risks assumed by future uses of the site.

At this time we are requesting a summary of all work performed at this site since the issuance of the June 25, 1987 AGS , report. Please include copies of all reports, proposals, laboratory results, etc. which may have been generated during this period. These materials should be submitted within 15 days, or by **November 14, 1989**. We will review these documents and assess what future action, if any, will be required.

Please be advised, however, that a preliminary site assessment will be required at this time if none has been performed to date. Such an assessment must be conducted in accordance with the RWQCB Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks. This will necessitate that Ultramar Company contract with a reputable engineering/geotechnical consulting firm. The responsibility of your consultant will be to submit for review a proposal outlining planned activities pertinent to meeting RWQCB requirements. Once the proposal is approved and the preliminary assessment completed, a technical report summarizing site related activities , conclusions and recommendations must be submitted to this office and the RWQCB. All reports and proposals must be submitted under seal of a California-Certified Engineering Geologist, - Registered Geologist, or - Registered Civil Engineer.

P 062 127 696

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to <i>Mr Randy Stevens</i>	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt by First-Class Delivery	
Return Receipt by Registered Mail	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3800, June 1985

Items 1 and 2 when additional services are requested.

Put your address on the reverse side. Failure to do so will prevent this card from being returned to you. The return receipt fee will provide you the name and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery (Extra charge)

3. Article Addressed to:
*Mr. Randy Stevens
Ultramar Co.
525 West Third St.
Hamford CA 93230*

4. Article Number
P 062 127 696

Type of Service:
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Address
X

6. Signature - Agent
X Blanche

7. Date of Delivery
OCT 3 1988

8. Addressee's Address (ONLY if requested and fee paid)
Same as 3

Mr. Randy Stevens
RE: Former Beacon SS#0574
22315 Redwood Rd.
Castro Valley
October 27, 1989
Page 3 of 3

As was stated previously, please submit your summary report and supporting documents by November 14, 1989. Should you have any questions, please contact the undersigned at 415/271-4320

Sincerely,


Scott O'Seery
Hazardous Materials Specialist

SOS:mam

cc: Rafat A. Shahid, Assistant Agency Director, Alameda County
Department of Environmental Health
Howard Hatayama, DHS
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Mark Thompson, Alameda County District Attorney, Consumer
and Environmental Protection Division
Mike Hood, Alameda County Building and Inspection Dept.
Lester Feldman, RWQCB
Bob Bohman, Castro Valley Fire Dept.
Files

BEACON

An Ultramar Company

525 WEST THIRD STREET • HANFORD, CA 93230 • (209) 582-0241

October 5, 1987

Mr. Ted Gerow
Alameda County
Environmental Health Department
470 - 27th Street, 3rd Floor
Oakland, California 94612

RE: Former Station #574
22315 Redwood Road
Castro Valley, CA

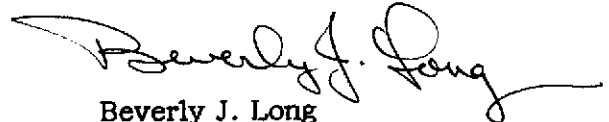
Dear Mr. Gerow:

At the request of Bill Wagner, I am forwarding a copy of the "Unauthorized Release" form (original mailed to you 8/28/87) and copies of the "Certificates of Disposal" issued by H & H Ship Service Company, denoting the disposition of the tanks which were removed from the site.

Please feel free to call me at 209/583-3247 if you should require anything further.

Very truly yours,

BEACON OIL COMPANY



Beverly J. Long
Environmental Coordinator

BJL:si

Enclosures

RECEIVED
OCT 13 1987
ALAMEDA COUNTY
ENVIRONMENTAL HEALTH DEPARTMENT

Tel confer Larry Mirattabi
city Bldg Inspection -
OK for Bldg permit
when food plan submitted
10/13/87

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK)/CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input type="checkbox"/> NO	STATE TANK ID # _____
REPORT DATE 0 M 8 M 2 D 8 D 8 Y 7 Y	LOCAL CASE # _____	REGIONAL BOARD CASE # _____
US EPA ID # _____		SIGNATURE _____

NAME OF INDIVIDUAL FILING REPORT Beverly Long	PHONE (209) 583-3247	SIGNATURE _____
REPRESENTING <input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OTHER <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD	COMPANY OR AGENCY NAME Beacon Oil Company	
ADDRESS 525 West Third Street STREET		
Hanford CITY	CA STATE	93230 ZIP

NAME Beacon Oil Co. <input type="checkbox"/> UNKNOWN	CONTACT PERSON Steve Epperson	PHONE (209) 583-3372
ADDRESS 525 West Third Street STREET		
Hanford CITY	CA STATE	93230 ZIP

FACILITY NAME (IF APPLICABLE) Station #574 (CLOSED)	OPERATOR ()	PHONE ()
ADDRESS 22316 Redwood Road STREET		
Castro Valley CITY	Alameda COUNTY	94546 ZIP
CROSS STREET Grove Way	TYPE OF AREA <input type="checkbox"/> COMMERCIAL <input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> RESIDENTIAL <input type="checkbox"/> RURAL <input type="checkbox"/> OTHER	TYPE OF BUSINESS <input checked="" type="checkbox"/> RETAIL FUEL STATION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER

LOCAL AGENCY AGENCY NAME Alameda CA. Environmental Health	CONTACT PERSON T.A. Gerow	PHONE (415) 874-6434
REGIONAL BOARD San Francisco Bay	CONTACT PERSON Tom Callaghan	PHONE (415) 464-1255
TSCD ()		

SUBSTANCES INVOLVED	CAS # (ATTACH EXTRA SHEET IF NEEDED) NAME	QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN
(1)		<input type="checkbox"/> UNKNOWN
(2)		<input type="checkbox"/> UNKNOWN

DATE DISCOVERED 05 M 05 D 8 Y 7 Y	HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> ROUTINE MONITORING <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> OTHER:
DATE DISCHARGE BEGAN M M D D Y Y <input type="checkbox"/> UNKNOWN	METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> REMOVE CONTENTS <input type="checkbox"/> REPLACE TANK <input checked="" type="checkbox"/> CLOSE TANK <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> CHANGE PROCEDURES <input type="checkbox"/> OTHER
HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE 05 M 05 D 8 Y 7 Y	TANKS ONLY/CAPACITY GAL AGE _____ YRS. <input type="checkbox"/> UNKNOWN MATERIAL <input type="checkbox"/> STEEL <input type="checkbox"/> FIBERGLASS <input type="checkbox"/> OTHER

SOURCE(S) OF DISCHARGE <input type="checkbox"/> TANK LEAK <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER (SPECIFY)	TANKS ONLY/CAPACITY GAL AGE _____ YRS. <input type="checkbox"/> UNKNOWN MATERIAL <input type="checkbox"/> STEEL <input type="checkbox"/> FIBERGLASS <input type="checkbox"/> OTHER	CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> CORROSION <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER
--	---	---

RESOURCES AFFECTED/ AT RISK	RESOURCES AFFECTED		THREATENED	UNKNOWN	WATER SUPPLIES AFFECTED		THREATENED	UN- KNOWN	# OF WELLS
	YES	NO			YES	NO			
AIR (VAPOR)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
SOIL (VADOSE ZONE)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
GROUNDWATER	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
SURFACE WATER OR STORM DRAIN	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
BUILDING OR UTILITY VAULT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
OTHER (SPECIFY)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

COMMENTS: _____ _____	GROUNDWATER BASIN NAME <input checked="" type="checkbox"/> UNKNOWN
COMPLETE AND ATTACH A CLEANUP TRACKING REPORT IF ANY CLEANUP WORK OR PLANNING HAS STARTED	

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK)/CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input type="checkbox"/> NO		STATE TANK ID #		
REPORT DATE 08 M 20 D 88 Y 7 Y		LOCAL CASE #		REGIONAL BOARD CASE #		
REPORTED BY	NAME OF INDIVIDUAL FILING REPORT Beverly Long		PHONE (209) 583-3247		SIGNATURE <i>Beverly Long</i>	
	REPRESENTING <input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OTHER <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD		COMPANY OR AGENCY NAME Beacon Oil Company			
	ADDRESS 525 West Third Street Hanford CA 93230					
RESPONSIBLE PARTY	NAME Beacon Oil Co. <input type="checkbox"/> UNKNOWN		CONTACT PERSON Steve Epperson		PHONE (209) 583-3372	
	ADDRESS 525 West Third Street Hanford CA 93230					
SITE LOCATION	FACILITY NAME (IF APPLICABLE) Station #574 (CLOSED)		OPERATOR		PHONE ()	
	ADDRESS 22315 Redwood Road Castro Valley Alameda COUNTY 94546					
	CROSS STREET Grove Way		TYPE OF AREA <input type="checkbox"/> COMMERCIAL <input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> RESIDENTIAL <input type="checkbox"/> RURAL <input type="checkbox"/> OTHER		TYPE OF BUSINESS <input checked="" type="checkbox"/> RETAIL FUEL STATION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER	
IMPLEMENTING AGENCIES	LOCAL AGENCY Alameda Co. Environmental Health		AGENCY NAME		CONTACT PERSON T.M. Gerow	
	REGIONAL BOARD San Francisco Bay				PHONE (415) 874-6434	
	TSCD				Tom Callaghan (415) 464-1255	
SUBSTANCES INVOLVED	CAS # (ATTACH EXTRA SHEET IF NEEDED) NAME				QUANTITY LOST (GALLONS)	
	(1)				<input checked="" type="checkbox"/> UNKNOWN	
DISCOVERY/ABATEMENT	DATE DISCOVERED 05 M 05 D 88 Y 7 Y		HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> ROUTINE MONITORING <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> OTHER			
	DATE DISCHARGE BEGAN M M D D Y Y <input checked="" type="checkbox"/> UNKNOWN		METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> REMOVE CONTENTS <input type="checkbox"/> REPLACE TANK <input checked="" type="checkbox"/> CLOSE TANK <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> CHANGE PROCEDURES <input type="checkbox"/> OTHER			
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE 05 M 05 D 88 Y					
SOURCE/CAUSE	SOURCE(S) OF DISCHARGE <input type="checkbox"/> TANK LEAK <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER (SPECIFY)		TANKS ONLY/CAPACITY GAL AGE YRS. <input type="checkbox"/> UNKNOWN MATERIAL <input type="checkbox"/> STEEL <input type="checkbox"/> FIBERGLASS <input type="checkbox"/> OTHER		CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> CORROSION <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER	
	RESOURCES AFFECTED		THREATENED		WATER SUPPLIES AFFECTED	
RESOURCES AFFECTED/AT RISK	AIR (VAPOR)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> THREATENED <input type="checkbox"/> UNKNOWN	PUBLIC DRINKING WATER	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> THREATENED <input checked="" type="checkbox"/> UNKNOWN
	SOIL (VADOSE ZONE)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> THREATENED <input type="checkbox"/> UNKNOWN	PRIVATE DRINKING WATER	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> THREATENED <input checked="" type="checkbox"/> UNKNOWN
	GROUNDWATER	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> THREATENED <input checked="" type="checkbox"/> UNKNOWN	INDUSTRIAL	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> THREATENED <input checked="" type="checkbox"/> UNKNOWN
	SURFACE WATER OR STORM DRAIN	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<input type="checkbox"/> THREATENED <input type="checkbox"/> UNKNOWN	AGRICULTURAL	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> THREATENED <input checked="" type="checkbox"/> UNKNOWN
	BUILDING OR UTILITY VAULT	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<input type="checkbox"/> THREATENED <input type="checkbox"/> UNKNOWN	OTHER (SPECIFY)	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> THREATENED <input type="checkbox"/> UNKNOWN
	OTHER (SPECIFY)	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> THREATENED <input type="checkbox"/> UNKNOWN	GROUNDWATER BASIN NAME <input checked="" type="checkbox"/> UNKNOWN		
COMMENTS	COMMENTS:					
	COMPLETE AND ATTACH A CLEANUP TRACKING REPORT IF ANY CLEANUP WORK OR PLANNING HAS STARTED					

INSTRUCTIONS

-2-

1. GENERAL

In box titled "EMERGENCY", indicate whether emergency response personnel and equipment were involved at any time. If so, a Hazardous Material Incident Report should be filed with the State Office of Emergency Services (OES) at 2800 Meadowview Road, Sacramento, CA 95832. Copies of the OES report form may be obtained at your local underground tank permitting agency. Indicate whether the OES report has been filed as of the date of this report.

In space provided, enter state tank ID number if known. State ID numbers have been assigned to all tanks that are on file with the State Water Resources Control Board. Enter today's date in the box titled "Report Date". Enter local and Regional Water Quality Control Board case numbers if known. Enter the US EPA facility number if applicable.

2. REPORTED BY

Enter your name, telephone number and address. Indicate which party you represent, and provide company or agency name.

3. RESPONSIBLE PARTY

Enter the name, telephone number, contact person, and address of the party responsible for the leak, or mark unknown. For tank leaks, the responsible party would normally be the tank owner.

4. SITE LOCATION

Enter information regarding the tank facility and surrounding area. If a known tank or facility is not involved, enter general location of the contamination site as best possible; i.e., street, city, county, zip, cross street, and type of area.

5. IMPLEMENTING AGENCIES

Enter names of the local agency, Regional Board and/or Toxic Substances Control Division (TSCD) regional office involved and a contact person and telephone number for each.

6. SUBSTANCES INVOLVED

Enter the CAS number(s) (if known), name(s), and quantities lost of all hazardous substances involved. Attach an extra sheet if more than two substances are involved. Be as specific as possible.

7. DISCOVERY/ABATEMENT

Provide information regarding the discovery and abatement of the discharge. More than one box may be checked in the sections titled "How Discovered" and "Method Used To Stop Discharge" if appropriate.

8. SOURCE/CAUSE

Indicate source(s) of discharge. Provide details on tank age; capacity and material if a tank is involved. Check box(es) indicating cause of discharge. More than one box may be checked if appropriate.

9. RESOURCES AFFECTED/AT RISK

In section titled "RESOURCES AFFECTED" indicate whether any of the resources listed have been affected ("YES"), will not be affected ("NO"), or may be affected ("THREATENED") by the release. Check "UNKNOWN" if unsure of the status of a resource. Specify any unlisted resources which are, or may be, involved under "OTHER". The same instructions apply to the section titled "WATER SUPPLIES AFFECTED." Give the number of water wells affected or threatened, if known. Provide the name of the ground-water basin underlying the site, if known, in the space provided.

10. COMMENTS

Use this space to elaborate on any aspects of the incident. Comments on cleanup work or planning or related investigations should be reported on a separate Cleanup Tracking Report.

11. SIGNATURE

Sign the form in the space provided.

DISTRIBUTION

Hand deliver or mail copies of the form as follows:

- | | |
|--|--|
| 1) Original - Local Agency | 3) Regional Water Quality Control Board |
| 2) State Water Resources Control Board
Division of Water Quality
Underground Tank Program
P. O. Box 100
Sacramento, CA 95801 | 4) Toxic Substances Control Division
Underground Tank Program
714/744 P Street
Sacramento, CA 95814 |
| | 5) Owner/responsible party |



SHIP SERVICE COMPANY

W. J. HARRIS

TERMS: CASH

DATE May 21, 1987

OUR INVOICE NO. 587-106

OUR JOB NO. 5198

CUSTOMER'S REFERENCES

PO NO. 64375

JOB NO.

Beacon
525 - W. 3rd Street
Hanford, California 93230

Furnished necessary labor, material and equipment to pick up, clean and dispose of one (1) 8,000 Gals., one (1) 7,000 Gals., two (2) 5,000 Gals. and one (1) 550 Gals. Tanks as directed.

Work started 5/5/87, Station #574, Castro Valley.
Work completed 5/8/87, Richmond, California.

Transportation (12 Hours @65.00)	\$ 780.00
Disposal of Tanks (1-8,000 Gals. @1,000.00)	1,000.00
(1-7,000 Gals. @1,000.00)	1,000.00
(2-5,000 Gals. @750.00)	1,500.00
(1-550 Gals. @500.00)	500.00
Tolls	24.00
TOTAL INVOICE	<u>\$4,804.00</u>

RECEIVED
MAY 27 1987
ACCOUNTS PAYABLE

220 CHINA BASIN, P.O. BOX 77363 • SAN FRANCISCO, CA 94107 • DAY AND NIGHT: (415) 543-4835





W. J. HARKINS

CERTIFICATE OF DISPOSAL

8 MAY 1987

H & H Ship Service Company hereby certifies to BEACON
that:

1. The storage tank(s) removed from the BEACON STATION, 574

facility at 22315 REDWOOD ROAD

CASTRO VALLEY, CALIFORNIA

(address)

were transported to H & H Ship Service Company, 220 China Basin Street,
San Francisco, California 94107.

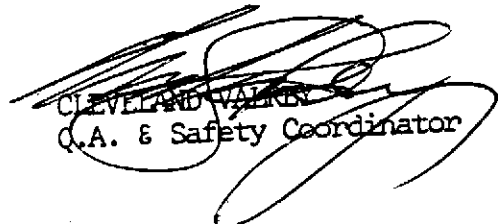
2. The following tank(s), H & H Job Number: 5198,
have been steam cleaned, cut with approximately 2' x 2' holes, rendered
harmless and disposed of as scrap metal.

3. Disposal site: LEVIN METALS CORPORATION, RICHMOND, CALIFORNIA

4. The foregoing method of destruction/disposal is suitable for the
materials involved, and fully complies with all applicable regulatory
and permit requirements.

5. Should you require further information, please call (415) 543-4835.

Very Truly Yours,


CLEVELAND WALKER
O.A. & Safety Coordinator

220 CHINA BASIN, P.O. BOX 77363 · SAN FRANCISCO, CA 94107 · DAY AND NIGHT: 543-4835



BEACON

An Ultramar Company

525 WEST THIRD STREET • HANFORD, CA 93230 • (209) 582-0241

*199
fill UG TANKS*

RECEIVED
APR 6 1987

April 1, 1987

ENVIRONMENTAL HEALTH
ADMINISTRATION

Mr. Ted Gerow
Alameda County Environmental Health Department
470 - 27th Street, Room 324
Oakland, California 94612

RE: ~~Station #574~~
~~22315 Redwood Road~~
~~Castro Valley, CA~~

Dear Mr. Gerow:


~~Beacon proposes~~ to remove all of the underground storage tanks (two 5M gallon, one 7M gallon, one 8M gallon and one 550 gallon) and the related piping at the above referenced service station site.

A permit to perform the work will be obtained from the Castro Valley Fire Department by the contractor, Dan Brenton Construction, 2634 Pacer Lane, San Jose, CA, (408) 226-1920. Soil samples will be obtained from each tank pit and soil analyses results will be forwarded to your office.

If you should require anything further, please contact me immediately at 209/583-3247.

Very truly yours,

BEACON OIL COMPANY



Beverly J. Long
Environmental Coordinator

BJL:slh