SENT 04-06-06

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

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. RO0000355, 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

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

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

8-28-01

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

R0355

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

STID 3579

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

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

06-14-01

R0355

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

01-25-01

P0355

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 24, 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:

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,

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

12-7-00

R0355

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

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

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

11-1-00

RO#355

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

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

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

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

R0355

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.

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

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

RO# 355

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:

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

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

RO#355

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

RO#355

StId 3579/lop

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

May 28, 1997

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**

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

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.

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

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

20355

StId 3579/lop

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

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**

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.

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)

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

RO#355

RAFAT A. SHAHID, DIRECTOR

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

StId 3579

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,

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

R0355

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

STID 3579

January 13, 1995

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

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:

- Wells MW-1, -2, and -3 are to be sampled **semiannually**
- Wells MW-5, -6, and -7 are to be sampled **quarterly**
- 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.

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

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

RAFAT A. SHAHID, Assistant Agency Director

RO 355

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

STID 3579

January 13, 1995

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

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.

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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
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G. Robert Hale, Alameda County Public Works
Paul Wilson
Frederick Reyland

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

R0355

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

STID 3579

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.

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

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

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

R0355

STID 3579

December 1, 1992

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

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

Dear Mr. Earnest:

Thank you for meeting with me and Mr. Rich Hiett 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 Hiett, RWQCB
Bob Bohman, Castro Valley Fire Department
Leslie Johnson, Esq., Miller, Starr & Regalia
Paul Wilson
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Ed Howell - files

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

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

R0355

STID 3579

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 <u>all</u> 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 <u>an on-site release</u>. 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.

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.

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 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.

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

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

R0355

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

November 14, 1991

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

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

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 330 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.)

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.

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:

- 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.
- Status of ground water contamination characterization
- Interpretation of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.
- 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.

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.

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

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

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

RO356

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

certified mailer #P 367 604 334

November 13, 1991
STID# 3579

Notice of Requirement to Reimburse

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

Responsible Party
Contact Person
Property Owner

Ultramar Inc.
P.O. Box 466
525 W. Third St.
Hanford, CA 93232-0466

Responsible Party
Tank Operator

Beacon Station #574 (former)
22315 Redwood Rd.
Castro Valley, CA 94546

SITE

Date First Reported 08/28/87
Substance: gasoline,diesel
Petroleum (X)Yes

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

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

Edgar B. Howell, III, Chief
Contract Project Director

cc: Sandra Malos, SWRCB

SWRCB Use : | add: X Reason: New case |

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

R0355

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

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

R0355

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.

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 <u>all</u> 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.

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.

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

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

R0355

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
Bob Bohman, Castro Valley Fire Department
Leslie Johnson, Esq., Miller, Starr, & Regalia
Richard S. Usher, Ulramar
Dianne Lundquist, Shell Oil Company
Dale A. van Dam, Delta Environmental Consultants, Inc.
Paul A. Wilson
Fredrick W. Reyland

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

R0355

Telephone Number: (415)

DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISON
80 SWAN WAY, SUITE 200
OAKLAND, CA 94621
430 - 4830

Certified Mailer # P 062 128 095

September 19, 1990

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 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;

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

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
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
Frederick W. Reyland
files

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

R0355

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

Certified Mailer #P 062 127 934

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 or 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;

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 <u>do</u>, 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.

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.

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 <u>all</u> 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.

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;

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

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

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

R0355

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

Certifide Mailer #P 062 127 937

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
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Director

R0355

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.

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

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

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

R0355

December 13, 1989

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

(4)

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

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

Dear Ms. Yee:

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

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

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

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

A groundwater investigation is pending.

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

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

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

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

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

- no file on record

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

   - no file on record -

7. Keith's Transmission
   22312 Redwood Road

   Underground Tanks: one (1)

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

Year installed: 1981

Material/Type: steel, single-walled

Capacities/Contents: 1,000 gallon, waste oil

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

Leaks: unk

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

8a. Manor Cleaners
20857 Redwood Road

Underground tanks: NA

Leaks/discharges: unk

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

8b. Mirande One-Hour Cleaners
21120 Redwood Road

Underground Tanks: NA

Leaks/Discharges: unk

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

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

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

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

Sincerely,

Scott Seery
Hazardous Materials Specialist

SOS:mnc

Enclosure (1)

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

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

R0355

Certified Mailer #P 062 127 696

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

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.

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