

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RJHS

June 4, 1998

Kiran, Mahesh, & Nirmala Khatri  
4710 Ewing Rd.  
Castro Valley, CA 94546

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6700  
(510) 337-9432

Re: Underground storage tanks at 20450 Hesperian Blvd., San  
Lorenzo, CA 94541, STID 4116

Dear Mr. Khatri, Mr. Khatri, and Ms. Khatri:

Our file of this property and the county tax assessor records indicate that you are the property owners of the above location. An inspection on June 2, 1998, found the gasoline station where the underground storage tanks are located, out of business.

You must close (remove) the underground storage tanks (California Code of Regulations, Title 23, Division 3, Chapter 16, Section 2672). The enclosed application to close the underground storage tanks must be submitted within 30 days.

You should be aware that the California Health and Safety Code, Section 25299 states that any owner or operator of an underground tank is liable for civil penalties of not less than five hundred dollars (\$500) and not more than five thousand dollars (\$5,000) per day for failure to properly close an underground storage tank.

If you have any questions regarding this matter, please call me at 567-6746.

Sincerely,

Don Hwang  
Hazardous Materials Specialist

c: Chuck Headley, RWQCB  
Chief James Ferdinand, Alameda County Fire Department  
Tom Peacock  
Rob Weston

Enclosure

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

RO# 745

November 18, 1996

Mahesh Khatri  
Airport Alliance  
20450 Hesperian Blvd.  
Hayward, CA 94541

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

STID 4116

Subject: 20450 Hesperian Blvd., Hayward, CA 94541

Dear Mahesh Khatri:

Your site is being referred to the Regional Water Quality Control Board for oversight of the contamination resulting from your leaking underground storage tank. Contact person at this time is Kevin Graves who can be reached at (510) 286-0435. Their address is 2101 Webster St., Suite 500, Oakland, CA 94612. You will no longer be part of the Local Oversight Program of the County of Alameda.

If you have any questions regarding this transfer of lead agency please call me at 567-6782.

Sincerely,

Thomas F. Peacock, Manager  
Environmental Protection Division

c: Gordon Coleman, Acting Chief - files  
State Water Resources Control Board, Clean-up Fund  
Lori Casias, State Water Resources Control Board  
Bob Chambers, Alameda County District Attorney's Office  
Kevin Graves, Regional Water Quality Control Board

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Z0745

Alameda County  
Environmental Health  
1131 Harbor Bay Pkwy., #250  
Alameda CA 94502-6577  
(510)567-6700 FAX(510)337-9335

July 9, 1996

STIP: 4116

**Mr. Mahesh and Kiran Khatri**  
A & H Gas  
20450 Hesperian Boulevard  
Hayward, CA - 94545

**Re: A & H Gas, 20450 Hesperian Blvd, Hayward, CA - 94545**

Dear Mr. Khatri:

I am in receipt of the workplan, dated May 6, 1996, and an addendum to the workplan, dated June 6, 1996, prepared by Remediation Risk Management, Inc (RRM) in response to technical information requested by this Department, City of Hayward Fire Department, and the San Francisco Bay Regional Water Quality Control Board (RWQCB).

The workplan includes a proposal to collect groundwater samples from three hydropunches and to subsequently install two groundwater monitoring wells in optimum locations based on the results obtained from hydropunch samples. Also, the removal of free product by manual bailing has been proposed as an interim remedial measure.

This Department has reviewed the workplan and it is acceptable with the following changes:

- Two additional hydropunches should be installed in order to obtain adequate data to define the extent of petroleum hydrocarbon contamination. The locations of the additional hydropunches have been identified in an attached sample location map.
- Since the proposal to manually bail the free product is acceptable only as an interim measure, the cost benefits of implementing other remedial measures should be evaluated using the findings of the proposed investigation. A final corrective action plan should be submitted to this Department within 30 days after installing the monitoring wells.
- The corrective action plan should also include soil remediation measures which may be necessary if the concentrations of petroleum hydrocarbons found in the soil exceed the site - specific risk based cleanup levels which are to be determined using a peer reviewed risk assessment.

The implementation of the workplan should begin within 30 days from the date of this letter and the monitoring wells should be installed within 45 days from the date of this letter. If you have any questions, you may reach me at (510) 567-6764.

Sincerely,



Madhulla Logan  
Hazardous Material Specialist

C: **Hugh Murphy**, City of Hayward Fire Department, 25151 Clawiter Road, Hayward,  
CA - 94545

**Kevin Graves**, San Francisco Regional Water Quality Control Board, 2101 Webster,  
Oakland, 0CA -

**Bob Chambers**, District Attorney's Office, 7677 Oakport Street, #400, Oakland, CA -  
94621

**Gordan Coleman**, Acting Chief, Alameda County Environmental Health Department,  
Alameda, CA - 94502.

**Steve Krcik**, Remediation Risk Management, Inc, P.O Box 1362, Aptos, CA - 95001

**ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY**

DAVID J. KEARS, Agency Director



R0745

RAFAT A. SHAHID, DIRECTOR

CERTIFIED MAILER # P 368 729 491

October 10, 1995

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

**Kyle Christie  
ARCO Products Company  
2155 South Bascom Avenue, Suite 202  
Campbell, CA 95008**

**Subject: Contamination in the vicinity of West "A" Street and Hesperian Boulevard, Hayward**

**Dear Mr. Christie:**

We have reviewed information from our agency files. Our review of our files leads our agencies to believe that all of the following parties are potential contributors to the subject contamination:

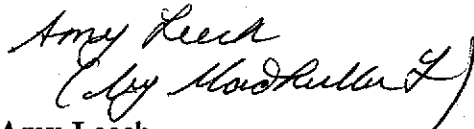
- (R0174) - Former Arco/Thrifty Service Station, 20200 Hesperian Boulevard, Alameda County
- (R0745) - Alliance Service Station, 20450 Hesperian Boulevard, Alameda County
- (RWGCB) - Former Texaco/Former Exxon Service Station, 20499 Hesperian Boulevard, Hayward
- (City of Hayward) - Former Shell Service Station, 20500 Hesperian Boulevard, Hayward
- (City of Hayward) - Former Unocal Service Station, 20501 Hesperian Boulevard, Hayward

As a result, we are requiring a meeting within 45 days with representatives from all the above mentioned companies. In the meeting we are requiring a presentation and a single definitive report that delineates the full extent of contamination and a plan of action for future activities. The plan should include 1) any additional investigation activities, 2) explanation of the type of cleanup and 3) a time schedule for major investigation and clean up events. We encourage all companies to utilize a common consultant and to cooperate with each other fully. For your convenience, we are attaching a list of direct contacts for each site (see attachment A).

If a single coordinated report and presentation is not achievable between the companies we will still require a meeting within 45 days. In that meeting we will be requiring an explanation from each company of why coordination was not possible. Each company must then present a specific detailed assessment of the full extent of contamination and a plan for cleanup. A dialogue will be expected to resolve any technical aspects.

In order to provide one contact for scheduling the meeting, please contact Hugh Murphy within 10 days of receiving this letter at (510) 293-8695. Once the meeting date and location has been set a letter will be sent out to confirm the time and location. Thank you for your cooperation in resolving this matter.

Sincerely,



Amy Leech  
District Inspector  
Alameda County Environmental Health Service  
(510) 567-6755



Madhulla Logan  
District Inspector  
Alameda County Environmental Health Service  
(510) 567-6764



Hugh Murphy  
Environmental Specialist  
City of Hayward Fire Department  
(510) 293-5454

cc: John Boykin, Hazardous Materials Coordinator  
Danilo Galang, Hazardous Materials Investigator  
Kevin Graves, California Regional Water Quality Control Board  
Gil Jensen, Alameda County Assistant District Attorney  
Thomas Peacock, Alameda County Environmental Health Service

**ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY**

DAVID J. KEARS, Agency Director



R0745

RAFAT A. SHAHID, DIRECTOR

CERTIFIED MAILER # P 368 729 492

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

October 10, 1995

Peter D'Amico  
Thrifty Oil Company  
10,000 Lakewood Boulevard  
Downey, CA 90240

**Subject: Contamination in the vicinity of West "A" Street and Hesperian Boulevard, Hayward**

Dear Mr. D'Amico:

We have reviewed information from our agency files. Our review of our files leads our agencies to believe that all of the following parties are potential contributors to the subject contamination:

- (R0174)- Former Arco/Thrifty Service Station, 20200 Hesperian Boulevard, Alameda County
- (R0745)- Alliance Service Station, 20450 Hesperian Boulevard, Alameda County
- (RW00CB) - Former Texaco/Former Exxon Service Station, 20499 Hesperian Boulevard, Hayward
- (City of Hayward)- Former Shell Service Station, 20500 Hesperian Boulevard, Hayward
- (City of Hayward)- Former Unocal Service Station, 20501 Hesperian Boulevard, Hayward

As a result, we are requiring a meeting within 45 days with representatives from all the above mentioned companies. In the meeting we are requiring a presentation and a single definitive report that delineates the full extent of contamination and a plan of action for future activities. The plan should include 1) any additional investigation activities, 2) explanation of the type of cleanup and 3) a time schedule for major investigation and clean up events. We encourage all companies to utilize a common consultant and to cooperate with each other fully. For your convenience, we are attaching a list of direct contacts for each site (see attachment A).

If a single coordinated report and presentation is not achievable between the companies we will still require a meeting within 45 days. In that meeting we will be requiring an explanation from each company of why coordination was not possible. Each company must then present a specific detailed assessment of the full extent of contamination and a plan for cleanup. A dialogue will be expected to resolve any technical aspects.

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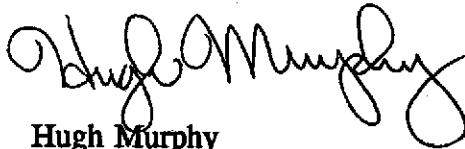
Sincerely,



Amy Leech  
District Inspector  
Alameda County Environmental Health Service  
(510) 567-6755



Madhulla Logan  
District Inspector  
Alameda County Environmental Health Service  
(510) 567-6764



Hugh Murphy  
Environmental Specialist  
City of Hayward Fire Department  
(510) 293-5454

cc: John Boykin, Hazardous Materials Coordinator  
Danilo Galang, Hazardous Materials Investigator  
Kevin Graves, California Regional Water Quality Control Board  
Gil Jensen, Alameda County Assistant District Attorney  
Thomas Peacock, Alameda County Environmental Health Service



**ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY**

DAVID J. KEARS, Agency Director



R0745

RAFAT A. SHAHID, DIRECTOR (2)

CERTIFIED MAILER # P 368 729 493

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

October 10, 1995

**Mahesh Khatri  
Airport Alliance  
20450 Hesperian Boulevard  
Hayward, CA 94545**

**Subject: Contamination in the vicinity of West "A" Street and Hesperian Boulevard, Hayward**

**Dear Mr. Khatri:**

We have reviewed information from our agency files. Our review of our files leads our agencies to believe that all of the following parties are potential contributors to the subject contamination:

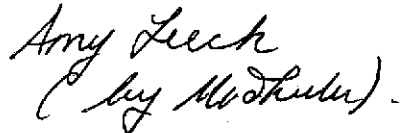
- (R0174) - Former Arco/Thrifty Service Station, 20200 Hesperian Boulevard, Alameda County
- (R0745) - Alliance Service Station, 20450 Hesperian Boulevard, Alameda County
- (RW&CB) - Former Texaco/Former Exxon Service Station, 20499 Hesperian Boulevard, Hayward
- (City of Hayward) - Former Shell Service Station, 20500 Hesperian Boulevard, Hayward
- (City of Hayward) - Former Unocal Service Station, 20501 Hesperian Boulevard, Hayward

As a result, we are requiring a meeting within 45 days with representatives from all the above mentioned companies. In the meeting we are requiring a presentation and a single definitive report that delineates the full extent of contamination and a plan of action for future activities. The plan should include 1) any additional investigation activities, 2) explanation of the type of cleanup and 3) a time schedule for major investigation and clean up events. We encourage all companies to utilize a common consultant and to cooperate with each other fully. For your convenience, we are attaching a list of direct contacts for each site (see attachment A).

If a single coordinated report and presentation is not achievable between the companies we will still require a meeting within 45 days. In that meeting we will be requiring an explanation from each company of why coordination was not possible. Each company must then present a specific detailed assessment of the full extent of contamination and a plan for cleanup. A dialogue will be expected to resolve any technical aspects.

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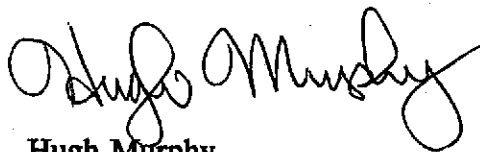
Sincerely,



Amy Leech  
District Inspector  
Alameda County Environmental Health Service  
(510) 567-6755



Madhulla Logan  
District Inspector  
Alameda County Environmental Health Service  
(510) 567-6764



Hugh Murphy  
Environmental Specialist  
City of Hayward Fire Department  
(510) 293-5454

cc: John Boykin, Hazardous Materials Coordinator  
Danilo Galang, Hazardous Materials Investigator  
Kevin Graves, California Regional Water Quality Control Board  
Gil Jensen, Alameda County Assistant District Attorney  
Thomas Peacock, Alameda County Environmental Health Service

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY, DEPARTMENT OF  
ENVIRONMENTAL HEALTH, ENVIRONMENTAL PROTECTION DIVISION

IN RE THE PROPERTY KNOWN AS :

20450 Hesperian Blvd.  
Hayward, CA 94606

) PROOF OF SERVICE BY MAIL  
) OF NOTICE  
) PRE-ENFORCEMENT  
) REVIEW PANEL

I KEVIN TINSLEY, do hereby certify  
that I served NIRMALA KHATRI, as an individual  
with a copy of the attached Notice of Pre-Enforcement Review  
Panel on October 04, 1995 by certified  
mailer # 7 296 048 375.

Dated: 10-4-95

Kevin Tinsley  
(signature)

**Alameda County Health Care Services, Department of Environmental Health,  
Environmental Protection Division**

In Re The Property Known As: )  
)  
20450 Hesperian Blvd. )  
Hayward, CA 94606 )  
)  
\_\_\_\_\_ )

**Directive to Comply**

Mr. Mahesh R. Khatri, as an individual  
20450 Hesperian Blvd.  
Hayward, CA 94606

Mr. Mahesh R. Khatri, president  
dba Airport Alliance  
20450 Hesperian Blvd.  
Hayward, CA 94606

Mr. Kiran Khatri, as an individual  
4710 Ewing Rd.  
Castro Valley, CA 94546

  
4710 Ewing Rd.  
Castro Valley, CA 94546

A Pre-Enforcement Review Panel was held at the Alameda County Department of Environmental Health Offices on August 17, 1995. At the Pre-Enforcement Review Panel it was determined that you are the owner and operator of the tanks on the property. As the owner and operator, the Pre-Enforcement Review Panel has found you to be responsible for the violations of Title 23 of the California Code of Regulations (CCR) and of Chapter 6.7 of the Health and Safety Code (HSC) at the property in question. The Pre-Enforcement Review Panel has made the following findings:

1. You have failed to provide inventory reconciliation records for the three 10,000 gallon single walled tanks on site to the administering agency, Alameda County Department of Health.
2. You have failed to submit your integrity testing results for the south end tank for 1993 and for all three underground storage tanks for 1994 to the administering agency, Alameda County Department of Health.

3. You have failed to submit the triennial pipe precision test results for the suction piping to the administering agency, Alameda County Department of Health.
4. You have failed to submit the annual written statement verifying under penalty of perjury that all monthly inventory reconciliation reports are summarized and that sums of the monthly variation does not exceed 130 gallons plus 1% (per cent) of the monthly fuel deliveries.

Pursuant to HSC Chapter 6.7, Sections 25284, 25284.4, 25292.1, 25293, and CCR Title 23, you are hereby directed to take the following actions within 30 days from the date of this directive:

1. Commence immediately a program of daily stick readings. Maintain the daily stick readings taken from all three tanks at the facility or at a readily accessible location so they can be provided within 36 hours of being requested.
2. Commence immediately the implementation of a statistical inventory reconciliation (SIR) monitoring program. SIR is required at your site due to reports confirming high groundwater at this location.
3. Submit a written monitoring and spill response plan that includes an accurate description of your SIR procedures.
4. Submit the daily stick readings and the statistical inventory reconciliation (SIR) results to the Alameda County Department of Health for the next three consecutive months.
5. Commence immediately a program of precision pipeline testing. The testing should be done once every three year period for all three pipelines. The test should be at a pressure designated by the test equipment manufacturer and capable of detecting a minimum release equivalent to 0.1 gph defined at a minimum 40psi.
6. Submit a complete copy of your tank integrity test results for all three tanks for 1993 and 1994 to Alameda County Department of Health..
7. Commence immediately the practice of submitting a statement certifying the inventory reconciliation data was within the allowable amounts for the entire year. If you can certify for the previous year, do so immediately.

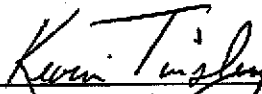
You are hereby notified that all of the above listed violations must be corrected in order for you to receive and maintain a valid five year permit to operate the tanks. **You must submit a signed written plan of correction which addresses the above requirements and clearly and precisely outlines when and how you will comply with this directive within 30 days of the date of this directive.**

Please be advised that this directive is being issued pursuant to the authority of California Health and Safety Code Chapter 6.7 and that failure to comply is **punishable by civil penalties of up to \$5,000 per day per tank per violation** as provided in HSC Section 25299.

Please contact me at (510) 567-6700 between 10am and 3 pm, Tuesday through Friday, if you have any questions.

Dated: October 2, 1995

Alameda County Health Officer  
for the Pre-Enforcement Review Panel

By   
Kevin Tinsley  
Hazardous Materials Specialist  
Alameda County Department of Health,  
Environmental Protection Division

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY, DEPARTMENT OF  
ENVIRONMENTAL HEALTH, ENVIRONMENTAL PROTECTION DIVISION

IN RE THE PROPERTY KNOWN AS :

20450 Hesperian Blvd.  
Hayward, CA 94606

PROOF OF SERVICE BY MAIL  
OF NOTICE  
PRE-ENFORCEMENT  
REVIEW PANEL

I KEVIN TINSLEY, do hereby certify  
that I served MR. KIRAN KHATRI, as an individual  
with a copy of the attached Notice of Pre-Enforcement Review  
Panel on October 04, 1995 by certified  
mailer # Z 296 048 374.

Dated: 10-4-95

Kevin Tinsley  
(signature)


**Alameda County Health Care Services, Department of Environmental Health,  
Environmental Protection Division**

In Re The Property Known As: )  
)  
20450 Hesperian Blvd. )  
Hayward, CA 94606 )  
)  
)  
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**Directive to Comply**

Mr. Mahesh R. Khatri, as an individual  
20450 Hesperian Blvd.  
Hayward, CA 94606

Mr. Mahesh R. Khatri, president  
dba Airport Alliance  
20450 Hesperian Blvd.  
Hayward, CA 94606

  
4710 Ewing Rd.  
Castro Valley, CA 94546

Nirmala Khatri, as an individual  
4710 Ewing Rd.  
Castro Valley, CA 94546

A Pre-Enforcement Review Panel was held at the Alameda County Department of Environmental Health Offices on August 17, 1995. At the Pre-Enforcement Review Panel it was determined that you are the owner and operator of the tanks on the property. As the owner and operator, the Pre-Enforcement Review Panel has found you to be responsible for the violations of Title 23 of the California Code of Regulations (CCR) and of Chapter 6.7 of the Health and Safety Code (HSC) at the property in question. The Pre-Enforcement Review Panel has made the following findings:

1. You have failed to provide inventory reconciliation records for the three 10,000 gallon single walled tanks on site to the administering agency, Alameda County Department of Health.
2. You have failed to submit your integrity testing results for the south end tank for 1993 and for all three underground storage tanks for 1994 to the administering agency, Alameda County Department of Health.



3. You have failed to submit the triennial pipe precision test results for the suction piping to the administering agency, Alameda County Department of Health.
4. You have failed to submit the annual written statement verifying under penalty of perjury that all monthly inventory reconciliation reports are summarized and that sums of the monthly variation does not exceed 130 gallons plus 1% (per cent) of the monthly fuel deliveries.

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3. Submit a written monitoring and spill response plan that includes an accurate description of your SIR procedures.
4. Submit the daily stick readings and the statistical inventory reconciliation (SIR) results to the Alameda County Department of Health for the next three consecutive months.
5. Commence immediately a program of precision pipeline testing. The testing should be done once every three year period for all three pipelines. The test should be at a pressure designated by the test equipment manufacturer and capable of detecting a minimum release equivalent to 0.1 gph defined at a minimum 40psi.
6. Submit a complete copy of your tank integrity test results for all three tanks for 1993 and 1994 to Alameda County Department of Health.
7. Commence immediately the practice of submitting a statement certifying the inventory reconciliation data was within the allowable amounts for the entire year. If you can certify for the previous year, do so immediately.

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Please contact me at (510) 567-6700 between 10am and 3 pm, Tuesday through Friday, if you have any questions.

Dated: October 2, 1995

Alameda County Health Officer  
for the Pre-Enforcement Review Panel

By Kevin Tinsley  
Kevin Tinsley  
Hazardous Materials Specialist  
Alameda County Department of Health,  
Environmental Protection Division

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY, DEPARTMENT OF ENVIRONMENTAL HEALTH, ENVIRONMENTAL PROTECTION DIVISION

IN RE THE PROPERTY KNOWN AS :

20450 Hesperian Blvd.  
Hayward, CA 94606

) PROOF OF SERVICE BY MAIL  
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that I served MR. MAHESH R. KHATRI, president/dba Airport Alliance  
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Dated: 10-4-95



Kevin Tinsley  
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**Alameda County Health Care Services, Department of Environmental Health,  
Environmental Protection Division**

In Re The Property Known As: )  
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**Directive to Comply**

Mr. Mahesh R. Khatri, as an individual  
20450 Hesperian Blvd.  
Hayward, CA 94606

  
  
20450 Hesperian Blvd.  
Hayward, CA 94606

Mr. Kiran Khatri, as an individual  
4710 Ewing Rd.  
Castro Valley, CA 94546

Nirmala Khatri, as an individual  
4710 Ewing Rd.  
Castro Valley, CA 94546

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7. Commence immediately the practice of submitting a statement certifying the inventory reconciliation data was within the allowable amounts for the entire year. If you can certify for the previous year, do so immediately.

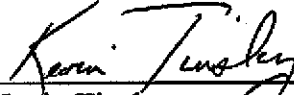
You are hereby notified that all of the above listed violations must be corrected in order for you to receive and maintain a valid five year permit to operate the tanks. You must submit a signed written plan of correction which addresses the above requirements and clearly and precisely outlines when and how you will comply with this directive within 30 days of the date of this directive.

Please be advised that this directive is being issued pursuant to the authority of California Health and Safety Code Chapter 6.7 and that failure to comply is **punishable by civil penalties of up to \$5,000 per day per tank per violation** as provided in HSC Section 25299.

Please contact me at (510) 567-6700 between 10am and 3 pm, Tuesday through Friday, if you have any questions.

Dated: October 2, 1995

Alameda County Health Officer  
for the Pre-Enforcement Review Panel

By   
\_\_\_\_\_  
Kevin Tinsley  
Hazardous Materials Specialist  
Alameda County Department of Health,  
Environmental Protection Division

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY, DEPARTMENT OF ENVIRONMENTAL HEALTH, ENVIRONMENTAL PROTECTION DIVISION

IN RE THE PROPERTY KNOWN AS :

20450 Hesperian Blvd.  
Hayward, CA 94606

PROOF OF SERVICE BY MAIL  
OF NOTICE  
PRE-ENFORCEMENT  
REVIEW PANEL

I KEVIN TINSLEY, do hereby certify  
that I served MR. MAHESH R. KHATRI, as an individual  
with a copy of the attached Notice of Pre-Enforcement Review  
Panel on October 04, 1995 by certified  
mailer #7 296 048 372.

Dated: 10-4-95

Kevin Tinsley  
(signature)

**Alameda County Health Care Services, Department of Environmental Health,  
Environmental Protection Division**

In Re The Property Known As: )  
 )  
 20450 Hesperian Blvd. )  
 Hayward, CA 94606 )  
 )  
 \_\_\_\_\_ )

**Directive to Comply**

  
 20450 Hesperian Blvd.  
 Hayward, CA 94606

Mr. Mahesh R. Khatri, president  
 dba Airport Alliance  
 20450 Hesperian Blvd.  
 Hayward, CA 94606

Mr. Kiran Khatri, as an individual  
 4710 Ewing Rd.  
 Castro Valley, CA 94546

Nirmala Khatri, as an individual  
 4710 Ewing Rd.  
 Castro Valley, CA 94546

A Pre-Enforcement Review Panel was held at the Alameda County Department of Environmental Health Offices on August 17, 1995. At the Pre-Enforcement Review Panel it was determined that you are the owner and operator of the tanks on the property. As the owner and operator, the Pre-Enforcement Review Panel has found you to be responsible for the violations of Title 23 of the California Code of Regulations (CCR) and of Chapter 6.7 of the Health and Safety Code (HSC) at the property in question. The Pre-Enforcement Review Panel has made the following findings:

1. You have failed to provide inventory reconciliation records for the three 10,000 gallon single walled tanks on site to the administering agency, Alameda County Department of Health.
2. You have failed to submit your integrity testing results for the south end tank for 1993 and for all three underground storage tanks for 1994 to the administering agency, Alameda County Department of Health.



3. You have failed to submit the triennial pipe precision test results for the suction piping to the administering agency, Alameda County Department of Health.
4. You have failed to submit the annual written statement verifying under penalty of perjury that all monthly inventory reconciliation reports are summarized and that sums of the monthly variation does not exceed 130 gallons plus 1% (per cent) of the monthly fuel deliveries.

Pursuant to HSC Chapter 6.7, Sections 25284, 25284.4, 25292.1, 25293, and CCR Title 23, you are hereby directed to take the following actions within 30 days from the date of this directive:

1. Commence immediately a program of daily stick readings. Maintain the daily stick readings taken from all three tanks at the facility or at a readily accessible location so they can be provided within 36 hours of being requested.
2. Commence immediately the implementation of a statistical inventory reconciliation (SIR) monitoring program. SIR is required at your site due to reports confirming high groundwater at this location.
3. Submit a written monitoring and spill response plan that includes an accurate description of your SIR procedures.
4. Submit the daily stick readings and the statistical inventory reconciliation (SIR) results to the Alameda County Department of Health for the next three consecutive months.
5. Commence immediately a program of precision pipeline testing. The testing should be done once every three year period for all three pipelines. The test should be at a pressure designated by the test equipment manufacturer and capable of detecting a minimum release equivalent to 0.1 gph defined at a minimum 40psi.
6. Submit a complete copy of your tank integrity test results for all three tanks for 1993 and 1994 to Alameda County Department of Health..
7. Commence immediately the practice of submitting a statement certifying the inventory reconciliation data was within the allowable amounts for the entire year. If you can certify for the previous year, do so immediately.

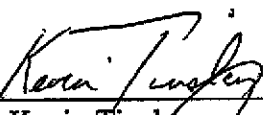
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Please be advised that this directive is being issued pursuant to the authority of California Health and Safety Code Chapter 6.7 and that failure to comply is **punishable by civil penalties of up to \$5,000 per day per tank per violation as provided in HSC Section 25299.**

Please contact me at (510) 567-6700 between 10am and 3 pm, Tuesday through Friday, if you have any questions.

Dated: October 2, 1995

Alameda County Health Officer  
for the Pre-Enforcement Review Panel

By   
Kevin Tinsley  
Hazardous Materials Specialist  
Alameda County Department of Health,  
Environmental Protection Division

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY, DEPARTMENT OF ENVIRONMENTAL HEALTH, ENVIRONMENTAL PROTECTION DIVISION

IN RE THE PROPERTY KNOWN AS :

20450 Hesperian Blvd.  
Hayward, CA 94606

) PROOF OF SERVICE BY MAIL  
) OF NOTICE  
) PRE-ENFORCEMENT  
) REVIEW PANEL

I KEVIN TINSLEY, do hereby certify  
that I served NIRMALA KHATRI, as an individual  
with a copy of the attached Notice of Pre-Enforcement Review  
Panel on October 04, 1995 by certified  
mailer # 7 296 048 375.

Dated: 10-4-95

Kevin Tinsley  
(signature)

**Alameda County Health Care Services, Department of Environmental Health,  
Environmental Protection Division**

In Re The Property Known As: )  
)  
20450 Hesperian Blvd. )  
Hayward, CA 94606 )  
)  
)  
\_\_\_\_\_ )

**Directive to Comply**

Mr. Mahesh R. Khatri, as an individual  
20450 Hesperian Blvd.  
Hayward, CA 94606

Mr. Mahesh R. Khatri, president  
dba Airport Alliance  
20450 Hesperian Blvd.  
Hayward, CA 94606

Mr. Kiran Khatri, as an individual  
4710 Ewing Rd.  
Castro Valley, CA 94546

Nirmala Khatri, as an individual  
4710 Ewing Rd.  
Castro Valley, CA 94546

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3. Submit a written monitoring and spill response plan that includes an accurate description of your SIR procedures.
4. Submit the daily stick readings and the statistical inventory reconciliation (SIR) results to the Alameda County Department of Health for the next three consecutive months.
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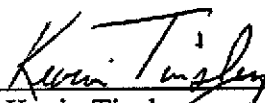
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Please contact me at (510) 567-6700 between 10am and 3 pm, Tuesday through Friday, if you have any questions.

Dated: October 2, 1995

Alameda County Health Officer  
for the Pre-Enforcement Review Panel

By   
\_\_\_\_\_  
Kevin Tinsley  
Hazardous Materials Specialist  
Alameda County Department of Health,  
Environmental Protection Division

**is your RETURN ADDRESS completed on the reverse side?**

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

**3. Article Addressed to:**  
**NIRMALA KHATRI,**  
**as an individual**  
**20450 Hesperian Blvd.**  
**Hayward, CA 94606**

**4a. Article Number:**  
**#Z 296 048 375**

**4b. Service Type:**  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

**7. Date of Delivery**

**5. Signature (Addressee)**

**6. Signature (Agent)**

**8. Addressee's Address (Only if requested and fee is paid)**

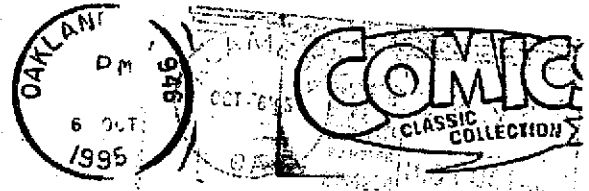
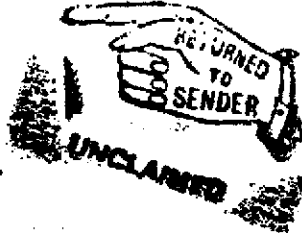
**1.  Addressee's Address**  
**2.  Restricted Delivery**  
 Consult postmaster for fee.

**PS Form 3811, December 1991 U.S. GPO: 1993-352-714**

**DOMESTIC RETURN RECEIPT**

**Thank you for using Return Receipt Service.**

CC: 4510  
 ALAMEDA COUNTY  
**HEALTH CARE SERVICES AGENCY**  
 Environmental Health Services Administration  
 1131 Harbor Bay Parkway, Suite 111  
 Alameda, CA 94502-6577



FIRST NOTICE 10-7  
 FINAL NOTICE 10-12  
 RETURNED 10-20

**NIRMALA KHATRI, as an individual**  
**20450 Hesperian Blvd.**  
**Hayward, CA 94606**

*Remail to: 4710 Ewing Road  
 Castro Valley, Ca. 94546*

94541-4730 04



**is your RETURN ADDRESS completed on the reverse side?**

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
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- The Return Receipt will show to whom the article was delivered and the date delivered.

**3. Article Addressed to:**  
**NIRMALA KHATRI, as an indiv.**  
**4710 EWING ROAD**  
**CASTRO VALLEY, CA 94546**

**4a. Article Number:**  
**Z 296 048 384**

**4b. Service Type:**  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

**7. Date of Delivery**

**1.  Addressee's Address**  
**2.  Restricted Delivery**  
 Consult postmaster for fee.

**I also wish to receive the following services (for an extra fee):**

**you for using Return Receipt Service.**

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY, DEPARTMENT OF  
ENVIRONMENTAL HEALTH, ENVIRONMENTAL PROTECTION DIVISION

IN RE THE PROPERTY KNOWN AS :

20450 Hesperian Blvd.  
Hayward, CA 94606  

---

) PROOF OF SERVICE BY MAIL  
) OF NOTICE  
) PRE-ENFORCEMENT  
) REVIEW PANEL

I KEVIN TINSLEY, do hereby certify  
that I served MR. KIRAN KHATRI, as an individual  
with a copy of the attached Notice of Pre-Enforcement Review  
Panel on October 04, 1995 by certified  
mailer # Z 296 048 374.

Dated: 10-4-95

Kevin Tinsley  
(signature)



**Alameda County Health Care Services, Department of Environmental Health,  
Environmental Protection Division**

In Re The Property Known As: )  
 )  
 20450 Hesperian Blvd. )  
 Hayward, CA 94606 )  
 )  
 )  
 \_\_\_\_\_ )

**Directive to Comply**

Mr. Mahesh R. Khatri, as an individual  
 20450 Hesperian Blvd.  
 Hayward, CA 94606

Mr. Mahesh R. Khatri, president  
 dba Airport Alliance  
 20450 Hesperian Blvd.  
 Hayward, CA 94606

  
 4710 Ewing Rd.  
 Castro Valley, CA 94546

Nirmala Khatri, as an individual  
 4710 Ewing Rd.  
 Castro Valley, CA 94546

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Please contact me at (510) 567-6700 between 10am and 3 pm, Tuesday through Friday, if you have any questions.

Dated: October 2, 1995

Alameda County Health Officer  
for the Pre-Enforcement Review Panel

By Kevin Tinsley  
Kevin Tinsley  
Hazardous Materials Specialist  
Alameda County Department of Health,  
Environmental Protection Division

Thank you for using Return Receipt Service.

PS Form 3811, December 1991 #U.S. GPO: 1993-292-714 DOMESTIC RETURN RECEIPT

9. Signature (Agent)

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

7. Date of Delivery

4b. Service Type  
 Express Mail  
 Return Receipt for Merchandise  
 Certified  
 COD  
 Registered  
 Insured

4a. Article Number  
 Z 296 048 374

3. Article Addressed to:  
 MR. KIRAN KHATRI,  
 as an individual  
 20450 Hesperian Blvd.  
 Hayward, CA 94606

1.  Addressee's Address

2.  Restricted Delivery

SENDING SERVICE: **K.I.T.**

also wish to receive the following services (for an extra fee):

• Attach this form to the front of the mailpiece, or on the back if space does not permit.

• Print your name and address on the reverse of this form so that we can return this card to you.

• Complete items 3, and 4a & b.

• Complete items 1 and/or 2 for additional services.

• Write "Return Receipt Requested" on the mailpiece below the article number.

• The Return Receipt will show to whom the article was delivered and the date delivered.

• Consult postmaster for fee.

CC: 4510  
 ALAMEDA COUNTY  
 HEALTH CARE SERVICES AGENCY  
 Environmental Health Services Administration  
 1131 Harbor Bay Parkway, Suite 111  
 Alameda, CA 94502-6577

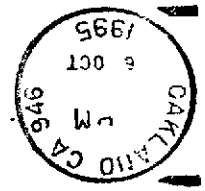


95 OCT 25 PM 17  
 U.S. POSTAGE  
 292

FIRST NOTICE 10-7  
 FINAL NOTICE 10-22  
 RETURNED 10-22

MR. KIRAN KHATRI, as an individual  
 20450 Hesperian Blvd.  
 Hayward, CA 94606

Remail To: 4710 Ewing Road  
 Castro Valley, Ca 94546



MAIL



URN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
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- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

3. Article Addressed to:  
**MR. KIRAN KHATRI, as an indiv.**  
**4710 EWING ROAD**  
**CASTRO VALLEY, CA 94546**

4a. Article Number  
**Z 296 048 385**

4b. Service Type  
 Registered  
 Certified  
 Express Mail  
 Insured  
 COD  
 Return Receipt for Merchandise

7. Date of Delivery

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

5. Signature (Addressee)

1.  Addressee's Address

2.  Restricted Delivery

Consult postmaster for fee.

also wish to receive the following services (for an extra fee):

Thank you for using Return Receipt Service

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY, DEPARTMENT OF ENVIRONMENTAL HEALTH, ENVIRONMENTAL PROTECTION DIVISION

IN RE THE PROPERTY KNOWN AS :

20450 Hesperian Blvd.  
San Lorenzo, CA 94546

PROOF OF SERVICE BY MAIL  
OF DIRECTIVE  
TO COMPLY

I Kevin Tinsley, do hereby certify  
that I served Airport Alliance, Attn: Mr. Kiran Khatri  
with a copy of the attached Directive to Comply on  
September 5, 1995 by certified  
mailer # Z 296 048 367

Dated: 09/01/95

Kevin Tinsley  
(signature)

**Alameda County Health Care Services Agency, Department of Environmental Health  
Environmental Protection Division**

In re the Property Known As: )  
 )  
 20450 Hesperian Blvd. )  
 San Lorenzo, CA 94565 )  
 )  
 \_\_\_\_\_ )

**Directive to Comply**

**Mr. Kiran Khatri  
 Airport Alliance  
 20450 Hesperian Blvd.  
 San Lorenzo, CA 94541**

A Pre-Enforcement Review Panel was held at the Alameda County Department of Environmental Health Offices on August 17, 1995. The Pre-Enforcement Review Panel has found you to be responsible for the violations at the property in question. Pursuant to Health and Safety Code (HSC) Chapters 6.7, you are hereby directed to comply with HSC Sections 25284, 25292.1, 25293, 25298. In order to not be in violation of the law, you are required to do the following:

1. Submit the daily stick readings for each of the three 10,000 gallon fuel tanks for June, July and August 1995.
2. Submit complete tank integrity tests results from the 1995 testing of each of your three fuel tanks.
3. Provide a copy of the triennial pipe precision test results conducted within the last three years for each of the three pipelines.
4. Submit a statement certifying the monthly inventory reconciliation results for each tank were within allowable limits during 1992, 1993 and 1994.
5. Provide a copy of your written plan which describes the facility layout and construction, monitoring procedures for each tank, tanks equipment maintenance, fuel spillage and emergency procedures.

You are hereby directed to implement these requirements within 30 days of the date of this directive. Please be advised that this directive is being issued pursuant to California

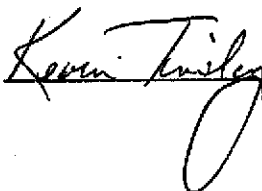
**Page 2 of 2**  
**Directive to comply**  
**Kiran Khatri**

Health and Safety Code Chapter 6.7 and that failure to comply is punishable by civil penalties of up to \$5,000 per day per tank per violation as provided in HSC Section 25299.

Please contact me at (510)567-6731 should you have any questions.

Dated: August 29, 1995

Kevin Tinsley  
Hazardous Materials Specialist

By  \_\_\_\_\_

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RO745

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

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

CERTIFIED MAILER # 196 176 816

February 27, 1995

Mike Khatri  
Airport Alliance  
16384 Foothill Boulevard, # 12  
San Leandro, CA

Subject: Airport Alliance site - 20450 Hesperian Blvd, Hayward  
California

Dear Mr. Khatri:

I am in receipt of your document "Site Characterization Report" dated October 6, 1994 for the above referenced site.

Seven borings, B-5 through B-11 were drilled on site during June and July 1994. Two borings, B-6 and B-9 were converted into monitoring wells, MW-1 and MW-2. Boring B-6 had elevated concentrations of TPH-g (Total Petroleum Hydrocarbon as gasoline) in soil (780 ppm) and groundwater (11000 ppb), and TPH-d (Total Petroleum Hydrocarbon as diesel) in groundwater (3000 ppb). Boring B-7 identified upto 560 ppm TPH-g in soil and also contained free product in groundwater. Boring B-8 had minor amounts of TPH-d and TPH-g contamination in the soil and elevated levels of TPH-g (48,000 ppb), TPH-d (6700 ppb), and BTEX (Benzene, Toluene, Ethyl Benzene and Xylene) in the groundwater. Based on the laboratory results for soil and groundwater, the following concerns need to be addressed:

1. The soil and groundwater characterization is not complete and hence additional investigation is required, especially to the western side of the property. As part of this investigation atleast one monitoring well to the west/north of Boring B-7 and B-6 will be required to delineate the groundwater contamination.
2. Since significantly elevated contaminant concentrations and free product have been detected in groundwater, an appropriate groundwater remediation system is required on site to mitigate the contamination. At the present time, priority should be give to free product removal, per article 11 Title 23, using either passive or active removal methods

To obtain a better perspective of offsite sources contributing to the contamination found at the site, a cross sectional analysis of the boring logs of the referenced site and the neighbouring



properties is recommended. Please submit a workplan within 60 days addressing the above mentioned issues. If you have any questions, call me at (510) 567-6764.

Sincerely,

A handwritten signature in cursive script that reads "Madhulla Logan".

Madhulla Logan  
Hazardous Materials Specialist

CC: Hugh Murphy, City of Hayward Fire Department  
Rafael Gallardo, Certified Environmental consulting

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0749

DEPARTMENT OF ENVIRONMENTAL HEALTH

October 17, 1994  
StID # 3576

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

Pacific Bell  
Ms. Irene Soto  
2600 Camino Ramon, Rm 2E050  
San Ramon, CA 94583

**Re: Request for a Work Plan for Further Subsurface Investigation  
at 1189 58th Ave., Oakland CA 94621**

Dear Ms. Soto:

As you are aware, a 8000 gallon gasoline tank was removed from this site on October 5, 1994 and the removal was overseen by Ms. Eva Chu of our office. We have received copies of the analytical results of soil and water samples taken subsequent to the removal as provided by Ms. Sydney Geels of IT Corporation. Although the soil samples did not detect any gasoline, it appears that there has been a fuel release to groundwater. Gasoline contamination was detected in both the initial and subsequent recharged water samples taken from the tank pit.

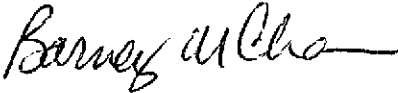
Because of these results, you are required to complete an Unauthorized Leak Report (ULR) and submit a work plan for additional subsurface investigation. Ms. Geels has informed me that a ULR has already been completed. Your work plan should call for the installation of at least one monitoring well in the verified downgradient direction relative to the tank pit. Should gradient not be able to be determined from surrounding sites, three monitoring wells will be required. Your work plan should be consistent with the Tri-Regional Board Guidelines, the SFRWQCB **Appendix A** and Title 23, Chapter 16 of the California Code of Regulations. Please submit your work plan to our office **within 45 days or December 5, 1994.**

Please be aware, this site has been transferred to the Local Oversight Program (LOP) section of the County's Environmental Health Department and we will be acting in behalf the Regional Water Quality Control Board (RWQCB) to oversee the remediation of this site until its completion.

You may contact me at (510) 567-6765 if you have any questions.

Ms. Irene Soto  
Pacific Bell, 1189 58th Ave.  
StID # 3576  
October 17, 1994  
Page 2.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: Ms. Sydney Geels, IT Corp., 4585 Pacheco Blvd., Martinez CA  
94553  
E. Howell, files

wp1189

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0745

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

June 8, 1994

Mr. Mahesh Khatri  
Airport Alliance  
4701 Ewing Road  
Castro Valley, CA 94546

1131 Harbor Bay Parkway, 2nd Flr  
Alameda CA 94502

STID 4116

Re: Work plan for investigations at Airport Alliance, located at  
20450 Hesperian Blvd., Hayward, California

Dear Mr. Khatri,

This office has reviewed Certified Environmental Consulting, Inc.'s (CEC) work plan, dated May 6, 1994, and the addendum to the work plan, dated June 7, 1994. This work plan is acceptable to this office, with the following additional requirements/reminders:

- o Although in my earlier conversations with Mr. Rafael Gallardo, CEC, I required only one ground water monitoring well, B-6, it appears that another well, possibly in the location of proposed boring B-9, is necessary to compare contaminant levels observed at the Shell station with the levels observed at Airport Alliance.
- o The monitoring wells shall be screened adequately above and below the water table to account for seasonal fluctuations (standardly, wells are screened five feet above shallowest seasonal water table and 10 feet below the water table).
- o Please be reminded to wait a minimum of 24 hours after installing the wells before developing the wells, and a minimum of 24 hours after developing the wells before purging and sampling the wells.
- o Please be reminded to survey the wells to an established benchmark (Mean Sea Level) to an accuracy of 0.01 foot. Be sure to survey these wells to the same benchmark as the other surrounding gas stations under investigation.

Mr. Mahesh Khatri  
Re: 20450 Hesperian  
June 8, 1994  
Page 2 of 3

As you are probably aware, the Hayward Fire Department and Alameda County Environmental Health Department are working together to coordinate the collection of water level measurements and ground water samples from all the investigation sites in the immediate area on the same day. The date has tentatively been scheduled for August 17, 1994 at approximately 10:00 A.M.. **Within 45 days** of sampling these wells, you will be required to submit a report documenting the implementation of the approved work plan and the sampling of the wells. Quarterly ground water level measurements and monitoring reports will be required until this site qualifies for closure.

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

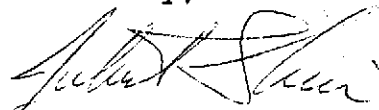
- o Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of ground water contamination characterization
- o Interpretations of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations or plans for additional investigative work remediation

The monitoring wells formerly installed at the site by Zane Miller cannot be used as part of the investigations, since there is no information on their construction. These wells should be properly destroyed through permits from the Alameda Flood Control Water District, Zone 7.

Mr. Mahesh Khatri  
Re: 20450 Hesperian  
June 8, 1994  
Page 3 of 3

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

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Mr. Rafael Gallardo  
Certified Environmental  
Consulting, Inc.  
536 Stone Road, Ste J  
Benicia, CA 94510-1016

Edgar Howell-File(JS)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0745

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

March 17, 1994

Mr. Mahesh Khatri  
Airport Alliance  
4701 Ewing Road  
Castro Valley, CA 94546

STID 4116

Re: Investigations at Airport Alliance, located at 20450  
Hesperian Blvd., Hayward, California

Dear Mr. Khatri,

This office has received and reviewed Certified Environmental Consulting's (CEC) Site Investigation Report, dated February 2, 1994. Four borings were placed at the site on January 24, 1994, and soil and "grab" ground water samples were collected from these borings. Elevated levels of both soil and ground water contamination were detected from these borings.

Based on information gathered from the neighboring Texaco/Exxon site, located at 20499 Hesperian Blvd., it appears that the regional ground water gradient has flowed consistently towards the northwest. If this is the case, then it appears that your site may be contributing to the observed regional ground water contaminant plume. Both soil and ground water samples collected from Boring B-2, the estimated upgradient direction from the on-site tanks and pump islands, identified very low levels of contaminants, while samples collected from the borings located in the verified downgradient direction from the tanks and pump islands identified very elevated contaminant levels.

Based on the above information, you will be required to conduct further soil and ground water investigations at the site. The analysis suite for future samples shall include Total Petroleum Hydrocarbons as gasoline (TPHg), Total Petroleum Hydrocarbons as diesel (TPHd), and benzene, toluene, ethylbenzene, and xylenes (BTEX). Although TPHd was apparently never stored at the site, there is no evidence to indicate that the TPHd contamination is coming from off-site since the upgradient boring, B-2, is identifying very low concentrations of diesel at 70 parts per billion (ppb), while the downgradient borings are identifying up to 2,700 ppb TPHd.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) requires that investigations be conducted to determine the **extent and severity** of soil and ground water contamination at the site. You are required to conduct a

Mr. Mahesh Khatri  
Re: 20450 Hesperian  
March 17, 1994  
Page 2 of 5

**Preliminary Site Assessment (PSA).** The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, and be consistent with requirements set forth in Article 11 of Title 23 California Code of Regulations. The major elements of such an investigation are summarized in the attached **Appendix A**. The major elements of the guidelines include, but are not limited to, the following:

- o At least one ground water monitoring well must be installed within 10 feet of the on-site tanks or pump islands, oriented in the confirmed downgradient direction relative to ground water flow. In the case of your site, it appears that three monitoring wells may be required to confirm that the gradient beneath your site is consistent with the neighboring sites. This office has received some information to indicate that there is a creek running beneath "A" Street, near the site. If this is the case, the ground water flow direction may be influenced by and fluctuate due to this creek. Please conduct some research to indicate whether or not this is the case.

During the installation of these wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology.

(This office has no information on the construction of the monitoring wells already installed at the site by Zane Miller. If no well information can be made available for our review, then these wells may not be used as part of the investigation. If you have no use for these wells, then they must be properly destroyed under permit by Zone 7).

- o Subsequent to the installation of monitoring wells, these wells must be surveyed to an established benchmark, (i.e., Mean Sea Level) with an accuracy of 0.01 foot. Ground water samples are to be collected and analyzed quarterly, and water level measurements are to be collected monthly for the first three months, and then quarterly thereafter. If the initial ground water elevation contours indicate



Mr. Mahesh Khatri  
Re: 20450 Hesperian  
March 17, 1994  
Page 3 of 5

that ground water flow directions vary greatly than you will be required to continue monthly water level measurements until the ground water gradient behavior is known. Both soil and ground water samples must be analyzed for TPHg, TPHd, and BTEX.

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. The RWQCB may choose to take over as lead agency if it is determined, following the completion of the initial assessment, that there has been a substantial impact to ground water.

In order to properly conduct a site investigation, you are required to obtain professional services of a reputable environmental consultant. All reports and proposals must be submitted under seal of a **California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.**

**The PSA proposal is due within 60 days of the date of this letter.** Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for final RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter.

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

- o Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of ground water contamination characterization.

Mr. Mahesh Khatri  
Re: 20450 Hesperian  
March 17, 1994  
Page 4 of 5

- o Interpretations of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations or plans for additional investigative work or remediation.

Please be advised that this is a formal request for a work plan pursuant to **Section 2722 (c,d) of Title 23 California Code of Regulations**. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

During the installation of the past borings, Scott Seery of our office noted that the asphalt around the dispenser islands had been cut implying that some work was conducted in association with the product piping. Please submit an explanation as to what work or repairs were conducted in association with these "scars".

Lastly, please submit documentation showing that the drums of soil cuttings were hauled off site to an appropriate disposal facility. Please submit this information, along with the above explanation of the "scars" around the dispenser island, within 30 days of the date of this letter.

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

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Rafael Gallardo  
Certified Environmental  
Consulting, Inc.  
536 Stone Road, Ste J  
Benicia, CA 94510-1016

Mr. Mahesh Khatri  
Re: 20450 Hesperian  
March 17, 1994  
Page 5 of 5

Martin B. Weinberg  
Somerset, Ltd.  
18201 Von Karman, Ste 1160  
Irvine, CA 92715

Kiras Khatri  
Airport Alliance  
20450 Hesperian Blvd.  
Hayward, CA 94541

Danny Chauhan  
18734 Walnut Rd.  
Castro Valley, CA 94546

Marla Guensler  
Exxon Company, U.S.A.  
P.O. Box 4032  
Concord, CA 94524-2032

Karen E. Petryna  
Texaco Refining &  
Marketing, Inc.  
108 Cutting Blvd.  
Richmond, CA 94804

Hugh Murphy, Hayward Fire Dept.

Edgar Howell-File(JS)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0745

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

January 18, 1994

Mahesh Khatri  
Airport Alliance  
4701 Ewing Road  
Castro Valley, CA 94546

STID 4116

Re: Work plan for the Airport Alliance site, located at 20450  
Hesperian Blvd., Hayward, California

Dear Mr. Khatri,

This office has reviewed Certified Environmental Consulting  
Inc.'s work plan, dated January 10, 1994, for the above site.  
This work plan is acceptable to this office with the following  
reminders:

- o Soil samples must be collected at 5-foot intervals, changes  
of lithology, and at the soil/water interface. A minimum  
of one soil sample from each boring shall be analyzed at a  
certified laboratory.
- o The borings can only be used as a screening tool. If soil  
and/or ground water contamination is identified from these  
borings, permanent monitoring wells must be installed.
- o Lastly, please submit any information on the investigations  
conducted out at the site in August and September 1993,  
within 15 days of the date of this letter.

Field work shall commence within 30 days of the date of this  
letter. A report documenting work shall be submitted within 45  
days after completing field activities.

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

Sincerely,

Juliet Shin  
Hazardous Materials Specialist

Mr. Mahesh Khatri  
Re: 20450 Hesperian Blvd.  
January 18, 1994  
Page 2 of 2

cc: Kiras Khatri  
Airport Alliance  
20450 Hesperian Blvd.  
Hayward, CA 94541

Danny Chauhan  
18734 Walnut Rd.  
Castro Valley, CA 94546

Martin Weinberg  
Weinberg & Weinberg  
18201 Von Karman Ave., Ste 1160  
Irvine, CA 92715

Marla Guensler  
Exxon Company, U.S.A  
P.O. Box 4032  
Concord, CA 94524-2032

Karen E. Petryna  
Texaco Refining &  
Marketing, Inc.  
108 Cutting Blvd.  
Richmond, CA 94804

Edgar Howell-File(JS)

ALAMEDA COUNTY  
HEALTH CARE SERVICE

AGENCY  
DAVID J. KEARS, Agency Director



R0745

RAFAT A. SHAHID, Assistant Agency Director

December 13, 1993

Mr Mahesh R Khatri  
20450 Hesperian Blvd  
Hayward CA 94541

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

Re: FIVE-YEAR PERMIT FOR OPERATION OF THREE UNDERGROUND  
STORAGE TANKS (UST'S) AT 20450 HESPERIAN BLVD HAYWARD

Dear Mr Khatri:

According to our records your facility referenced above has not received a five-year permit to operate UST's. In order to obtain a permit you must complete the following items marked below and return them within 30 DAYS. The necessary forms are enclosed. You may complete a "Consolidated Underground Tank Management Plan" which will assist you in preparing a monitoring plan, site plot plan and spill response plan for your tank(s). If supplemental information or forms are required, please submit it to this office with the completed questionnaire and application forms:

- 1. An accurate and complete plot plan.
- 2. A written spill response plan. (enclosed)
- 3. A written tank monitoring plan. (enclosed)
- 4. Results of precision tank test(s) (initial and annual)
- 5. Results of precision pipeline leak detector tests (initial and annual).
- 6. Complete UST PERMIT FORM A-one per facility. (enclosed)
- 7. Complete UST PERMIT FORM B-one per tank. (enclosed)
- 8. Complete UST PERMIT FORM C-one per tank if information is available. (enclosed)
- 9. Letter stating monthly inventory reconciliation variations are within allowable limits (i.e. 130 gallons + 1% of deliveries).

Be advised that Title 23 of the California Code of Regulation prohibits the operation of ANY UST without a permit. If our records are in error, you must contact this office immediately to avoid possible enforcement action. Please feel free to contact me at (510) 271-4320; to answer any questions which may arise in completing the mandatory five-year permit process.

Sincerely,

Kevin Tinsley  
Hazardous Materials Specialist

c: Edgar Howell, Chief, Hazardous Materials Division (KT-files)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0745

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

December 2, 1993

Mr. Danny Chauhan  
Airport Alliance  
18734 Walnut Rd.  
Castro Valley, CA 94546

STID 4116

Re: Investigations at the Airport Alliance site, located at 20450  
Hesperian Blvd., Hayward, California

NOTICE OF VIOLATION

Dear Mr. Chauhan,

This office has reason to believe that the above site is contributing to a regional ground water contaminant plume consisting of separate- and dissolved-phase hydrocarbons. This office, accordingly, requested that you conduct investigations to determine whether releases have occurred from underground storage tank (USTs) operations at your site. In a letter, dated February 17, 1993, from A Pump Repair Company, Mr. Zane Miller stated that he was in the process of conducting investigations to determine whether a release had occurred from operations at the site. This office received no work plan and no other information regarding the investigations. Consequently, on September 28, 1993, this office sent you a letter requiring that you submit a work plan or a report documenting all the investigative work that was conducted at the site to date. To this date, this office has not received any of the requested documents, nor have we been contacted regarding the status of the request.

Since June 1988, the owners of the Exxon site, located at 20499 Hesperian Blvd., have been conducting ground water investigations in response to releases from their former USTs. In March 1990, Exxon installed an off-site monitoring well, MW-4J, immediately adjacent to your site along Hesperian Boulevard. This well has consistently identified elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg) and benzene, toluene, ethylbenzene, and xylenes (BTEX). Additionally, in December 1991, Exxon's consultants identified 0.8 feet of free floating product from this well, which was the thickest amount of floating product

Mr. Danny Chauhan  
Re: 20450 Hesperian Blvd.  
December 2, 1993  
Page 2 of 3 :

identified from any of their off-site wells. Consequently, this office required you to conduct investigations on your property to assure this office that your site is not contributing to the observed contamination.

If the above referenced February 17, 1993 letter was correct, and investigations were, in fact, conducted out at the site, you are required to submit a report documenting all the field work. The report shall include the following:

- o Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of ground water contamination characterization
- o Interpretations of results: water level contour maps showing gradients, free and dissolved product, plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations of plans for additional investigative work or remediation.

This report, or a work plan if work has not already been conducted, must be submitted **within 30 days** of the date of this letter. In order to properly conduct a site investigation, you are required to obtain professional services of a reputable environmental consultant. **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 this project.

If monitoring wells are to be installed, soil samples are to be collected at five-foot-depth intervals and at any significant changes in lithology, during their installation. All ground water and soil samples collected must be analyzed for the appropriate fuel contaminants using the established lab methods listed in Table 2 of the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks.



Mr. Danny Chauhan  
Re: 20450 Hesperian Blvd.  
December 2, 1993  
Page 3 of 3 :

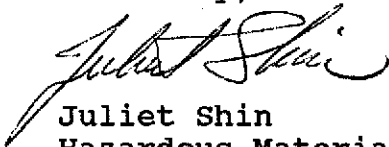
This Department will oversee the investigations at your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. The RWQCB may choose to take over as lead agency if it is determined, following the completion of the initial assessment, that there has been a substantial impact to ground water.

Please be advised that this is a formal request for a work plan pursuant to **Section 2722 (c) (d) of Title 23 California Code of Regulations**. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB. Failure to implement the required tasks may result in transfer of this case to the Alameda County District Attorney's Office.

Lastly, per my phone message to you on December 2, 1993, Hugh Murphy, Hayward Fire Department, and the property owners of the site across the street from yours, the Weinbergs, have scheduled to meet together on December 16, 1993. In order to resolve some of the contaminant issues, they need representatives from Airport Alliance to attend. Please contact me or Margi Spooner, Weinberg's Office, at (714) 474-8200, to let us know whether you can attend, or which date you would be available to attend the meeting.

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

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Zane Miller  
A Pump Repair Co.  
801 Northport  
West Sacramento, CA 95691

Gil Jensen, Alameda County District Attorney's Office

Edgar Howell-File(JS)

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0745

RAFAT A. SHAHID, Assistant Agency Director

November 2, 1992

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

Mr. Kiran Khatri  
Airport Alliance  
20450 Hesperian Blvd  
Hayward, CA 94541

**Re: Five-year Permit to operate and Underground Storage Tank(UST) Regulations, Airport Alliance, 20450 Hesperian Blvd, Hayward, CA 94541**

Dear Mr. Khatri:

This letter is in regard to the inspection made on October 29, 1992, at the above facility. This inspection was performed in order to bring your facility into compliance, inform you of new requirements of UST regulations, and issue a five year Permit to operate your underground storage tanks. **Please submit the following items:**

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

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

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

Mr. Khatri  
November 2, 1992  
Page 2 of 3

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

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

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

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

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

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

Mr. Khatri  
November 2, 1992  
Page 3 of 3

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

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

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

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

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

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

CC: files

USTREGOLD

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0745

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

September 28, 1993

Mr. Danny Chauhan  
Airport Alliance  
18734 Walnut Rd.  
Castro Valley, CA 94546

STID 4116

Re: Investigations at the Airport Alliance site, located at  
20450 Hesperian Blvd., Hayward, California

Dear Mr. Chauhan,

Since June 1988, the owners of the Exxon site, located at 20499 Hesperian Blvd., have been conducting ground water investigations in response to releases from their former underground storage tanks. In March 1990, Exxon installed an off-site monitoring well, MW-4J, immediately adjacent to your site along Hesperian Blvd. This well has consistently identified elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg) and benzene, toluene, ethylbenzene, and xylenes (BTEX). Additionally, in December 1991, Exxon's consultants identified 0.8 feet of free floating product from this well, which was the thickest amount of floating product identified from any of their off-site wells. Consequently, you are required to conduct investigations on your property to assure this office that your site is not contributing to the observed contamination.

Zane Miller, apparently your consultant, contacted this office and stated that investigations have already been conducted on the site. However, a work plan, detailing the proposed work, was never submitted to this office for our approval. If, in fact, investigations have been conducted at the site, you are required to submit a report documenting all the field work. The report shall include the following:

- o Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of ground water contamination characterization.

Mr. Danny Chauhan  
Re: 20450 Hesperian Blvd.  
September 27, 1993  
Page 2 of 3

- o Interpretations of results: water level contour maps showing gradients, free and dissolved product, plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations or plans for additional investigative work or remediation.

This report, or a work plan, must be submitted within 30 days of the date of this letter. In order to properly conduct a site investigation, you are required to obtain professional services of a reputable environmental consultant. 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 this project.

If monitoring wells are to be installed, soil samples are to be collected at five-foot-depth intervals and at any significant changes in lithology, during their installation. All ground water and soil samples collected must be analyzed for the appropriate fuel contaminants using the established lab methods listed in Table 2 of the **RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks**.

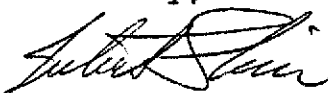
This Department will oversee the investigations at your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. The RWQCB may choose to take over as lead agency if it is determined, following the completion of the initial assessment, that there has been a substantial impact to ground water.

Please be advised that this is a formal request for a work plan pursuant to **Section 2722 (c)(d) of Title 23 California Code of Regulations**. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

Mr. Danny Chauhan  
Re: 20450 Hesperian Blvd.  
September 27, 1993  
Page 3 of 3

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

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Edgar Howell-File(JS)

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0745

RAFAT A. SHAHID, Assistant Agency Director

January 26, 1993

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

Kiran Khatri  
20450 Hesperian Blvd  
Hayward CA 94541

**Re: Alliance Station, 20450 Hesperian Blvd., Hayward 94541**

Dear Mr Khatri:

This office has reason to believe that your underground storage tanks could be a contributing source of subsurface contamination observed in the area of your site. The following facts support this possibility:

1) The owners of Exxon Station (formerly Texaco Service Station) , located at 20499 Hesperian Blvd., have been investigating soil and ground water contamination in and around their site since June of 1988. As part of their investigation, they installed monitoring wells on and off their site. One of their off-site monitoring wells, MW-4J, was installed on Hesperian Blvd., immediately adjacent to your site, and samples collected from this well identified up to 0.8 feet of free product (Please refer to the attached figure). This monitoring well is located immediately downgradient of your site, the hydraulic gradient having been determined to be towards the northwest.

2) Your inventory reconciliation variations noted for the period of July through September, 1990 exceeded the legal tolerances as indicated by the inspection report dated 9/27/1990.

In addition, the tank test results for 1989 as well as the test result for the leaded tank for 1990 were never submitted as indicated in the letter dated September 23, 1991.

I am aware that the last tank tightness tests (for 1992) indicated tight tank system in your site. However, please be informed that typical tank tightness tests are usually accurate up to 0.1 Gallon per Hour. This means that your tank can leak up to ( 0.1 x 24 = 2.4 ) 2.4 gallons per day or 876 gallons per year and still pass the typical tank tightness test.



Mr. Kiran Khatri  
Alliance Station  
Page 2 of 2  
January 28, 1993

Title 23 California Code of Regulations Article 11, Section 2724 requires subsurface investigation when free product is found at the site where the unauthorized release occurred or in the surrounding area.

You are required to submit a work plan to describe how you would investigate the vertical and lateral extent of the potential contamination at your site. This work plan must include a timetable for implementation and must be submitted within 30 days of the date of this letter.

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

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

c: Rafat A. Shahid, Asst. Agency Director, Department of  
Environmental Health  
Gil Jensen, Senior Deputy District Attorney, 7677 Oakport St.,  
Suite 400, Oakland CA 94621  
Eddy So, Regional Water Quality Control Board, 2101 Webster  
St. 5th floor Oakland CA 94612  
Hugh Murphy, City of Hayward Fire Dept. 25151 Clawiter Road,  
Hayward, CA 94545-2731  
Ed Howell-files

Allianc2

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0745

RAFAT A. SHAHID, Assistant Agency Director

May 1, 1992

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

Mr. Danny Chuhan  
Airport Alliance  
20450 Hesperian Blvd.  
Hayward, Ca 94541

Re: **FIVE-YEAR PERMITS FOR OPERATION OF THREE  
UNDERGROUND STORAGE TANKS (UST'S) AT 20450  
HESPERIAN BLVD HAYWARD**

According to our records the above mentioned facility has not received a five-year permit to operate UST's. Please complete the following items marked below and return them to me within 30 days. The example plans enclosed, should be used only as guidelines and may not meet your requirements under Title 23.

- 1. Complete UST PERMIT FORM A-one per facility. (enclosed)
- 2. Complete UST PERMIT FORM B-one per tank. (enclosed)
- 3. Complete UST PERMIT FORM C-one per tank if information is available. (enclosed)
- 4. A written tank monitoring plan. (enclosed)
- 5. Results of precision tank test(s) (initial and annual).
- 6. Results of precision pipeline leak detector tests (initial and annual).
- 7. An accurate and complete plot plan. (enclosed)
- 8. A written spill response plan. (enclosed)

Title 23 of the California Code of Regulation prohibits the operation of ANY UST without a permit. Please feel free to contact Amir K. Gholami at (510) 271-4320, if you have any questions which may arise in completing the mandatory five-year permit process.

Sincerely,

Ravi Arulanantham  
Senior Hazardous Materials Specialist  
(SYR)

cc: Gil Jensen, Alameda County District Attorney  
Rafat Shahid, Assistant Agency Director, Alameda  
County Department of Environmental Health

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0745

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

Certified Mailer # P 367 604 342

January 2, 1992

Mahesh Khatri  
4701 Ewing Rd.  
Castro Valley CA 94546

RE: Alliance Station, 20450 Hesperian Blvd., Hayward 94541

Dear Mr. Khatri:

Enclosed you will find the Final Notice of Violation issued to the operator of the Alliance Station at 20450 Hesperian Blvd. The Notice lists violations of Chapter 6.7 of The Health and Safety Code of California, Underground Storage of Hazardous Substances observed at the site. Our records indicate that you own this property.

This letter is to advise you that the act provides for owner liability for many of the listed violations. In addition, please be advised that Section 25299 (b) (4) the Health and Safety Code of California provides that an owner of any underground tank system shall be liable for a civil penalty of not less than \$500 or more than \$5000 per day for each tank for each day of violation when an owner has knowingly failed to take reasonable and necessary steps to assure compliance with Chapter 6.7 by the operator of the system. Please advise this office by January 15, 1992 of the corrective measures you have taken to assure operator and owner compliance with Chapter 6.7.

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

Sincerely,

A handwritten signature in cursive script that reads "Pamela J. Evans".

Pamela J. Evans  
Hazardous Materials Specialist

c: Mark Thomson, Alameda County District Attorney's Office  
Danny Chauhan, Airport Alliance  
Hugh Murphy, City of Hayward  
Eddy So, Regional Water Quality Control Board

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0745

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

Certified Mailer # P 367 604 344

January 2, 1992

Danny Chauhan  
18734 Walnut Rd.  
Castro Valley CA 94546

RE: Alliance Station, 20450 Hesperian Blvd., Hayward 94541

**FINAL NOTICE OF VIOLATION**

Dear Mr. Chauhan:

Since June, 1988, the owners of the Exxon site at 20499 Hesperian Blvd. have been investigating petroleum contamination of groundwater. Their latest report, like earlier ones, indicates that at least some contamination is coming from an offsite source.

The following violations of Title 23 of the California Code of Regulations have been noted in past inspection reports and Notices of Violation. The Sections cited below were in effect at the time that inspections were done at your facility.

1. Section 2643 (b) - Failure to perform yearly precision tests of all underground storage tanks.
2. Section 2643 (e) - Failure to provide results of precision tests to this agency. You have not submitted 1990 tank test results for the leaded fuel tank. No 1989 tank test results for any of your tanks has been submitted.
3. Section 2643 (f) - Failure to investigate inventory variations in excess of tolerances. In addition, you have submitted a quarterly summary report that incorrectly states that no inventory variations in excess of 50 gallons were found during the third quarter of 1990.
4. Section 13267, California Water Code - Failure to submit a technical report describing your plan for defining the extent of groundwater pollution impacting your site.

Danny Chauhan  
Airport Alliance  
January 2, 1992  
Page 2 of 2

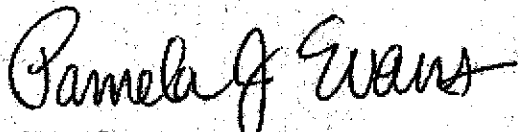
You have been instructed in previous Notices to provide proof that your tank systems are not a source of groundwater contamination. To date, you have failed to do so. You are required to submit the following documents and information to this office by January 15, 1992:

1. Precision tank test results for the leaded gasoline tank for 1990 and tank test results for all three tanks for 1989.
2. A written report of your investigation of inventory variations noted in excess of tolerance during the past three years.
3. A technical report describing your subsurface investigation plan. Include a timetable for implementation of the plan.

Section 25299 (a) of the Health and Safety Code of California states that any owner or operator of an underground tank system shall be liable for civil penalties of not less than \$500.00 per day for operating an underground tank in violation of the requirements found in the Health and Safety Code or the California Code of Regulations.

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

Sincerely,



Pamela J. Evans  
Hazardous Materials Specialist

c: Mark Thomson, Alameda County District Attorney's Office  
Mahesh Khatri, Property Owner  
Hugh Murphy, City of Hayward  
Eddy So, Regional Water Quality Control Board  
R.R. Zielinski, Texaco  
Charles Carmel, ARCO  
Randy Stone, Harding Lawson Associates

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0745

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

September 23, 1991

Danny Chauhan  
18734 Walnut Rd.  
Castro Valley CA 94546

**SECOND NOTICE OF VIOLATION**

RE: Alliance Station, 20450 Hesperian Blvd., Hayward 94541

Dear Mr. Chauhan:

Since June, 1988, the owners of the Exxon site at 20499 Hesperian have been investigating subsurface contamination. Their monitoring well sampling data indicates that at least some groundwater contamination is coming from an offsite source. You have been instructed in past notices from this office to submit proof that your tank systems are not a source of possible groundwater contamination by providing the following documents:

1. **Precision tank test results** for all three of your underground storage tanks for 1990 and 1989. No test results were submitted for the leaded fuel tank for 1990. No test results were submitted for any of the three tanks for 1989. Failure to perform precision tests is a violation of Section 2643 (b) of Title 23 of the California Code of Regulations. Failure to provide results of precision test to this agency is a violation of Section 2643 (e), CCR.
2. **A written report of an investigation of the inventory variations** noted for the period of July through September, 1990. These variations, in excess of legal tolerances, were noted and pointed out to you by Senior Hazardous Materials Specialist Thomas Peacock during his inspection of 9/27/90. Section 2643 (f), CCR, requires a tank owner or operator to report and investigate inventory variations in excess of legal tolerances.
3. **A technical report describing a plan for defining the extent of groundwater pollution impacting your site.** The plan must include an implementation schedule. You are required to submit this plan pursuant to California Water Code Section 13627.

Danny Chauhan  
Alliance  
Page 2 of 2  
September 23, 1991

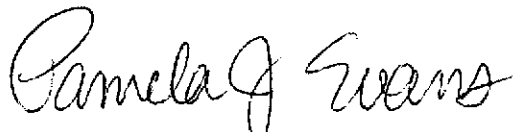
**You are required to submit the following documents and information to this office by October 5, 1991:**

1. Precision tank test results for the leaded gasoline tank for 1990 and tank test results for all three tanks for 1989.
2. A written report of your investigation of inventory variations noted in excess of tolerance during the past three years.
3. A technical report describing your subsurface investigation plan. Include a timetable for implementation.

Please note that Section 25299 (a) of the Health and Safety Code of California states that any owner or operator of an underground tank system shall be liable for civil penalties of not less than \$500 per day for operationg and underground tank in violation of the requirements found in the Health and Safety Code or the California Code of Regulations.

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

Sincerely,



Pamela J. Evans  
Hazardous Materials Specialist

c: Eddy So, Regional Water Quality Control Board  
Hugh Murphy, City of Hayward  
R.R. Zielenski, Texaco  
Frank Wells, ARCO  
Randy Stone, Harding Lawson Associates



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

July 24, 1991

Danny Chauhan  
Alliance  
18734 Walnut Rd.  
Castro Valley CA 94546

**NOTICE OF VIOLATION**

**RE: Alliance Station, 20450 Hesperian Blvd., Hayward 94541**

Dear Mr. Chauhan:

Since June, 1988, the owners of the Exxon site at 20499 Hesperian Blvd. have been investigating subsurface contamination. Their monitoring well sampling data indicates that at least some groundwater contamination is coming from an offsite source. On March 19, 1991, you were required by this office to submit proof that your tank systems are not a source of possible groundwater contamination by providing the following documents:

1. Precision tank test results for all three of your underground storage tanks for 1990. No test results were submitted for the leaded gasoline tank for 1990. No test results were submitted for any of the three tanks for 1989. Failure to perform precision tests is a violation of Section 2643 (b) of the California Code of Regulations. Failure to provide results of precision tests to this agency is a violation of Section 2643 (e), CCR.
2. A written report of your investigation of the inventory variations that occurred during the third quarter of 1990. These variations were in excess of legal tolerances and were noted and pointed out to you by Senior Hazardous Materials Specialist Thomas Peacock during his inspection of 9/27/90. Section 2643 (f), CCR requires a tank owner or operator to report and investigate inventory variations in excess of legal tolerances.
3. A technical report describing your plan for defining the extent of groundwater pollution impacting your site. You are required to submit this plan pursuant to California Water Code Section 13267. Your plan must include an implementation schedule.

You were also instructed to correct the following violations noted during Mr. Peacock's inspection:

1. Failure to investigate possible water accumulation in your underground tanks. Section 2644 (b), CCR, requires that tank



Danny Chauhan  
Alliance  
July 24, 1991  
Page 2 of 2

owners/operators use a means to check for water accumulation as part of their inventory reconciliation.

2. Failure to check through-put meters for accuracy as required by Section 2644 (b), CCR.
3. Failure to submit quarterly reports of inventory variations noted in the course of monitoring your underground tanks as required by Section 2644 (e), CCR.

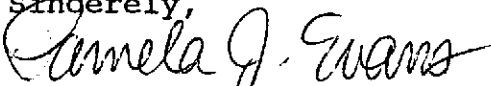
**You are required to submit the following documents and information to this office by August 10, 1991:**

1. Precision tank test results for the leaded gasoline tank for 1990 and tank test results for all three tanks for 1989.
2. A written report of your investigation of inventory variations noted in excess of tolerance during the past three years.
3. A technical report describing your subsurface investigation plan.
4. A written description of your method for detecting accumulation of water within your underground tanks.
5. Quarterly reports of inventory reconciliation for the past three years.

Please note that Section 25299 (a) of the Health and Safety Code of California states that any owner or operator of an underground tank system shall be liable for a civil penalty of not less than \$500 per day for operating an underground tank in violation of the requirements found in the Health and Safety Code or the California Code of Regulations.

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

Sincerely,



Pamela J. Evans  
Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney's Office  
Richard Hiatt, Regional Water Quality Control Board  
Hugh Murphy, City of Hayward  
James Ferdinand, Eden Consolidated Fire Protection District

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0745

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

March 19, 1991

Danny Chauhan  
18734 Walnut Rd.  
Castro Valley CA 94546

RE: Groundwater Contamination at Alliance Station  
20450 Hesperian Blvd., Hayward

Dear Mr. Chauhan:

Since June, 1988, the owners of the former Texaco (now Exxon) site at 20499 Hesperian have been investigating subsurface contamination. A number of onsite and offsite wells have been installed in order to define the extent of the contaminant plume. Because floating petroleum product has been discovered in an upgradient directly adjacent to your site, you must submit proof that your tank systems are not a source of contamination by providing:

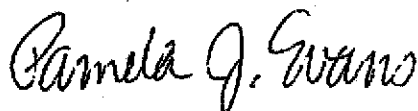
1. Precision tank test results for all three of your underground storage tanks for 1990 and 1989. No test results were submitted for the leaded fuel tank for 1990. No test results were submitted for any of the three tanks for 1989.
2. A written report of an investigation of the inventory variations noted for the period of July through September, 1990. These variations, in excess of legal tolerances, were noted and pointed out to you by Senior Hazardous Materials Specialist Thomas Peacock during his inspection of 9/27/90. Mr. Peacock instructed you in writing on that date to investigate these variations, check underground tanks for accumulation of water, have through put meters checked for accuracy, and to begin submitting quarterly reports of inventory variations.
3. A technical report describing a plan for defining the extent of groundwater pollution impacting your site. The plan must include an implementation schedule. You are required to submit this plan pursuant to California Water Code Section 13627.

Danny Chauhan  
Alliance  
Page 2 of 2  
March 19, 1991

The precision tank test results, the investigation report, and the investigation plan must be received in this office by no later than April 30, 1991.

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

Sincerely,



Pamela J. Evans  
Hazardous Materials Specialist

c: Richard Hiett, Regional Water Quality Control Board  
Hugh Murphy, City of Hayward  
R.R. Zielenski, Texaco  
Elaine J. Lavine, ARCO  
Randy Stone, Harding Lawson Associates