

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 8-14-2000

RO# 1039

August 11, 2000

STID 2422

Merliza Alcala
Tosco Marketing Company
2000 Crow Canyon Place, Ste. 400
San Ramon, CA 94583

Ali Aliasgari
Tosco Station #31141
15803 E. 14th Street
San Leandro, CA 94578

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

NOTICE OF VIOLATION

Re: Inspection of Tosco Station #31141, 15803 E. 14th Street, San Leandro

Dear Ms. Alcala and Mr. Aliasgari:

A regulatory compliance inspection was performed at the subject Tosco facility on August 1, 2000. A representative of Central Petroleum facilitated the inspection. The purpose of the inspection was to determine compliance with conditions of the facility underground storage tank (UST) operating permit, as well as provisions of Title 23, California Code of Regulations (CCR) and California Health and Safety Code (HSC) Chapter 6.7.

The following is a summary of non-compliant and other conditions noted at the time of the inspection:

- Rubber bellows connecting the top of both overfill buckets to the underside of the cover flange were separated on the 87 product tank
- Dirt and debris were accumulated in 3 of the 4 product tank overfill buckets; the vapor overfill bucket for the 92 product tank had water accumulated in it
- STP sumps of both product tanks had accumulated water (up to 4")
- Leak detector probe in the 92 product STP sump was elevated to avoid contact with the accumulated water
- Surface gaskets of one or more of the steel access lids were damaged

Ms. Alcala and Mr. Aliasgari
Re: 15803 E. 14th St., San Leandro
August 11, 2000
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- Waste oil UST annulus probe was damaged (although functional)
- Waste oil UST annulus surface cover seal was damaged and several bolts missing
- Waste oil UST riser sump had a 6" accumulation of waste oil
- Waste oil UST riser sump leak detector probe had been raised to preclude triggering the alarm
- Waste oil UST overfill bucket had accumulated debris. The bucket's perimeter "rain channel" and drain were filled with oil.
- Waste oil UST riser sump steel surface cover seal was damaged
- An apparent, secondarily-contained, remote fill pipe stub was evident in the waste oil UST riser sump. The primary pipe is open-ended and not plumbed to the tank riser or other component. Oil was seen within the primary pipe suggesting its use.
- Wooden blocks (2) were placed atop both float trip mechanisms in the Bravo box for dispenser # 1 / 2, rendering this element of the leak detection system at this site inoperable
- Metallic automotive parts (2) were placed atop both float trip mechanisms in the Bravo box for dispenser # 7 / 8, rendering this element of the leak detection system at this site inoperable
- Chains connecting most of the dispenser Bravo containment float trip mechanisms were too loose
- Liquid was accumulated in the amplification wells of the Bravo float trip mechanisms beneath dispenser # 5 / 6
- Bravo box containment pans for dispensers # 5 / 6 and 7 / 8 were dirty
- Annual employee training records in the area of spill response and cleanup were lacking
- Insufficient spill supplies (i.e., absorbent) were available

There has been a history of water intrusion into both the fuel tank STP sumps and dispenser Bravo boxes. This problem has been brought to Tosco's attention on more than one occasion in the recent past. Water intrusion will, and apparently *does*, trigger the TLS-350 monitoring alarms and Bravo box float mechanisms, the latter tripping the dispenser shear valves. When the alarm is triggered or shear valves tripped, the flow of product stops. This is likely what prompted someone to both raise the STP sump probes and weight the mechanical floats. This problem must be permanently solved.

Accumulation of waste oil *in any quantity* in the waste oil riser sump is improper. Its presence there appears to demonstrate a design and installation oversight and/or operator error. How this occurred must be determined and rectified to preclude future

Ms. Alcala and Mr. Aliasgari
Re: 15803 E. 14th St., San Leandro
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occurrences. Intentionally raising the monitoring sensor in this sump to preclude triggering the alarm is disturbing.

There appears to be evidence of a secondarily-contained, remote fill pipe that penetrates into the riser sump of the waste oil tank. The apparent primary pipe is not hard plumbed to any other component within the sump: it simply remains open. Review of the 1989 UST installation plans suggests that remote fills were excluded from California installation projects. However, the presence of such an apparent appurtenance is suspect. Adding to this suspicion is the presence of oil within the mouth of the primary pipe (see attached image), in addition, of course, to the substantial accumulation of waste oil found there.

It is apparent that no great care has been exercised in dispensing waste oil into the waste oil UST, too. The overflow bucket's perimeter "rain channel" and drain were filled with oil. The drain opening is plumbed to a tube that discharges to the tank backfill. These observations strongly suggest that the operator is failing to visually monitor the placement of waste oil into the tank, a violation of a permit condition for this element of the overflow prevention requirement for this tank.

Violations of provisions of the HSC and CCR have been identified, as follows:

- HSC Sec. 25293 – The operator of the underground tank system shall monitor the tank system using the method specified on the permit for the tank system.

Rendering the float trip mechanisms below two dispensers inoperable and raising monitoring probes above the base of UST sumps (and standing liquid) are violations of a condition of your permit.

- HSC Sec. 25294 – Any unauthorized release from the primary containment which the operator is able to clean up within 8 hours after the release was detected *or should reasonably have been detected*, and which does not escape from the secondary containment....shall be recorded on the operator's monitoring reports. [emphasis added]

The presence of waste oil within the waste oil tank riser sump and around the overflow bucket, the raised riser sump sensor, the apparent lack of documents recording this release, and the failure to cleanup the release within 8 hours after the release should reasonably have been detected is violation.

Ms. Alcala and Mr. Aliasgari
Re: 15803 E. 14th St., San Leandro
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- CCR Sec. 2712(k) – Owners and operators shall use care to prevent releases due to spilling or overfilling.

Accumulations of waste oil in locations that are outside the primary vessel of the UST, i.e., riser sump and overflow bucket “rain channel” and drain, do not demonstrate such care.

Please be advised that HSC Sec. 25299(a) provides for civil liabilities imposed on the tank operator of up to \$5000 per tank per day per violation for:

- (2) Violation of any applicable requirement of the permit
- (6) Violation of any applicable requirements of HSC Chapter 6.7
- (9) Tampering with or otherwise disabling automatic leak detection devices or alarms

Please be further advised that HSC Sec. 25299(b) provides for civil liabilities imposed on the tank owner of up to \$5000 per tank per day per violation for:

- (4) Knowing failure to take reasonable and necessary steps to assure compliance with HSC Chapter 6.7 by the operator
- (5) Violation of any applicable requirement of the permit issued for operation of the underground tank system
- (6) Violation of any applicable requirements of HSC Chapter 6.7

In addition, HSC Sec. 25299(d)(2) provides for civil penalties of no less than \$5000 and up to \$10,000 to be imposed on any person who intentionally disables or tampers with an automatic leak detection system in a manner that would prevent the automatic leak detection system from detecting a leak or alerting the owner or operator of the leak.

At this time, Tosco and the operator are required to correct the tank system violations and related issues identified in this inspection report, namely:

- Complete and submit the attached set of updated UST Registration Forms
- Correct the operation and maintenance problems identified during the 8/1/00 inspection and as articulated in this report.

This work would include, among other tasks: 1) completion of preventative upgrade work to preclude future water infiltration into Bravo dispenser containment boxes and UST STP sumps and/or implementation of inspection and maintenance procedures

Ms. Alcala and Mr. Aliasgari
Re: 15803 E. 14th St., San Leandro
August 11, 2000
Page 5 of 5

and schedules to identify and remove such water whenever it is present at the earliest possible time; 2) preclude future accumulations of waste oil in the waste oil UST riser sump, and permanently seal the "rain water" channel drain surrounding the overfill bucket; and 3) improve fill practices when placing waste oil into the waste oil UST.

- Explore the apparent remote-fill feature of the waste oil UST. Any discovered remote fill receptacle and/or piping shall be permanently sealed.
- Provide "as-built" drawings for the UST systems at this site, including waste oil

Pursuant to HSC Sec. 25288(d), Tosco is required to submit a *Plan of Correction* **within 60 days**. This plan shall indicate the tasks to be completed, or those that have been completed already, and the schedule for doing so. We will expect that accompanying this plan will be the updated UST Registration Forms.

Tosco must certify, once all the necessary repairs and other tasks have been completed, that the tank systems are in full compliance with HSC Chapter 6.7 and UST regulations. Pursuant to HSC Sec. 25285(b), this agency cannot renew the UST permit, when due, until we determine the UST systems are in full compliance. We recommend, therefore, that Tosco employ their own inspectors and engineers to ensure that this requirement is met, and to provide the appropriate level of quality control Tosco will likely need to make this certification.

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

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachments (Tosco, only) - 8 pages

cc: Mike O'Connor, Alameda County District Attorney's Office
Tom Peacock, ACDEH
Robert Weston, ACDEH

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 6-12-2000
mcd cc's

R01039

June 12, 2000

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

STID 2422

Mr. David De Witt
Tosco Marketing Company
2000 Crow Canyon Place, Ste. 400
San Ramon, CA 94583

RE: Unocal Service Station #6277, 15803 E. 14th Street, San Leandro

INTENT TO MAKE A DETERMINATION THAT NO FURTHER ACTION IS
REQUIRED

Dear Mr. De Witt:

This letter is to inform you that Alameda County Environmental Health Department, Local Oversight Program (LOP), intends to make a determination that no further action is required at the above site, as concurrence from the Regional Water Quality Control Board (RWQCB) has been received. Please notify this agency of any input and recommendations you may have on these proposed actions within 20 days of the date of this letter.

In accordance with section 25297.15 of Ch. 6.7 of the Health & Safety Code, you must provide certification to the local agency that all of the current record fee title owners have been informed of the proposed action. Please provide this certification to this office within 20 days of the date of this letter.

If you have any questions about these proposed actions, please contact Scott Seery at (510) 567-6783.

Sincerely,

Thomas Peacock
Manager, LOP

cc: Chuck Headlee, RWQCB
Scott Seery, ACDEH LOP

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R01039

May 4, 1999

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

STID 2422

Mr. David DeWitt
Tosco Marketing Company
2000 Crow Canyon Place, Ste. 400
San Ramon, CA 94583

RE: Unocal Service Station #6277, 15803 E. 14th Street, San Leandro

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. DeWitt:

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

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

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

LANDOWNER NOTIFICATION
Re: 15803 E. 14th Street, San Leandro
May 4, 1999
Page 2 of 2

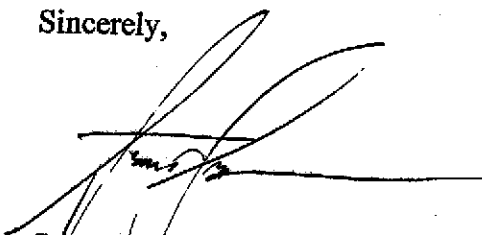
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

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

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

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

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#1039

RAFAT A. SHAHID, DIRECTOR

STID 2422

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6720

February 20, 1996

Mr. David J. Camille
Unocal Corporation
2000 Crow Canyon Place, Suite 400
P. O. Box 5155
San Ramon, CA 94583

RE: UNOCAL, 15803 EAST 14TH STREET, SAN LEANDRO

Dear Mr. Camille,

This letter follows review of the case file for this site, up to and including the February 5, 1996 MPDS Services "Semi-Annual Data Report". This letter is in response to the changing regulations resulting from Senate Bill 1764 (and the SB1764 Scientific Advisory Committee). In response to the October 16, 1995-Lawrence Livermore National Laboratory (LLNL) Study entitled "Recommendations To Improve the Cleanup Process for California's Leaking Underground Fuel Tanks", the California Regional Water Quality Control Board (RWQCB) issued its December 8, 1995 "Interim Guidance on Required Cleanup at Low Risk Fuel Sites". This document was further modified by the January 5, 1996-RWQCB "Supplemental Instructions" guidance recommended for use in regulating low-risk sites. These guidance documents concur with the findings and conclusions of the LLNL Study, which recommended that fuel sites be treated differently and less stringently than solvent sites. The study also concluded that most fuel sites fall into the low-risk category, for which source removal and passive remediation are adequate.

In order for your site to fall into the "Low Risk Groundwater Case" the following definitions must apply:

- 1) The leak has been stopped and ongoing sources, including free product, have been removed or remediated.
- 2) The site has been adequately characterized.
- 3) The dissolved hydrocarbon plume is not migrating.
- 4) No water well, deeper drinking water aquifers, surface water, or other sensitive receptors are likely to be impacted.
- 5) The site presents no significant risk to human health.
- 6) The site presents no significant risk to the environment.

Mr. David J. Camille
RE: 15803 East 14th Street
February 20, 1996
Page 2 of 2

At this time more information is needed to adequately characterize the above referenced site so as to make an accurate determination whether this site can be defined as a "Low Risk Groundwater Case". The additional information required pertains to definition 3) **The hydrocarbon plume is not migrating.** And is passive bioremediation a viable remedial alternative?

This required information could be collected by performing a rapid site assessment to determine the extent of the benzene groundwater plume down gradient of monitoring well MW-1. In addition, documenting the levels of dissolved oxygen in both the up-gradient and down-gradient directions from monitoring well MW-1 would provide the needed information to determine whether passive bioremediation is a viable remedial alternative.

This information would be sufficient to make an acceptable determination whether this site can be defined as a "Low Risk Groundwater Case". If so, I feel that this site would qualify for case closure with the Regional Water Quality Control Board.

Should you have any questions concerning this matter, please feel free to contact me at (510)567-6880.

Sincerely,



Dale Klettke, CHMM
Hazardous Materials Specialist

c: Thomas Peacock, LOP Manager--files
Gil Jensen, Alameda County District Attorneys Office
Mike Bakaldin, San Leandro Hazardous Materials Program
Kevin Graves, RWQCB

Be

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SITE: 15803 E. 14th ST.
SAN LEANDRO, CA

Ro# 1039
RAFAT A. SHAHID, DIRECTOR

February 6, 1996

Alameda County Environmental Health Dept.
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577
(510)567-6700 fax: (510)337-9335

Lincoln Properties Company
101 Lincoln Centre Drive
Foster City, CA 94404

Attn: John McMorro

RE: HAMLET APARTMENTS, 1319 - 159TH AVENUE, SAN LEANDRO
(UNINCORPORATED), ALAMEDA COUNTY

Dear Mr. McMorro:

This letter is in response to a January 30, 1996 request from Mr. Brett Bovee of ATC Environmental, Inc. (ATC) that this agency consider sampling data and historic property use information as it relates to the presence of specific halogenated volatile organic compounds (HVOC) in ground water sampled from wells located at the subject site. Mr. Bovee further requests that this agency present its opinion regarding the potential that activities occurring at the subject site prior to the construction of the Hamlet Apartments could have been the source of or contributed to the presence of the noted HVOCs in sampled ground water.

For your information, during the course of the underground storage tank (UST) leak investigation at the adjoining Unocal service station, 15803 E. 14th Street, two monitoring wells, designated MW-5 and MW-6, were constructed on the Hamlet Apartment property. Because components of motor vehicle fuel and certain HVOCs were detected historically in ground water sampled from each of the wells on the Unocal site, both fuel components and HVOCs were sought in samples drawn from wells MW-5 and -6 during the April 1993 sampling event. Tetrachloroethylene (also known as perchloroethylene, or PCE), a HVOC and common commercial drycleaning solvent, was detected in the samples from both MW-5 and -6. HVOCs have not been sought in either well since; analysis for HVOC still occurs annually in samples drawn from Unocal well MW-3, only.

In the May 10, 1993 Kaprealian Engineering, Inc. (KEI) report entitled "Continuing Soil and Ground Water Investigation and Quarterly Report," submitted on behalf of Unocal Corporation, KEI discusses past uses of the Unocal property prior to the site's development as a retail service station with respect to possible sources of HVOCs encountered in sampled ground water. KEI

Mr. John McMorrow
RE: Hamlet Apts., 1319-159th Ave., San Leandro
February 6, 1996
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concluded that "...at least part of the [HVOC] contamination at the Unocal site could be due to an unidentified source located upgradient of the [Unocal] site.." or is a part of a "regional" plume, referring to the ongoing Central San Leandro study being conducted by Cal EPA Department of Toxic Substances Control (DTSC). (Note: Both the subject and Unocal sites lie outside the current DTSC study area.)

In the January 27, 1996 ATC report entitled "Historical Assessment, Hamlet Apartments, 1319 159th Avenue, San Leandro, California," ATC writes that they discovered no evidence suggesting that past uses of the subject property could have contributed to the PCE discovered in wells MW-5 and -6. Further, ATC indicates that HVOCs identified in ground water sampled from wells located on the subject and Unocal sites are from an upgradient source. ATC's conclusions appear to be predominantly based on review of historical documents, including, but not necessarily limited to: aerial photographs, building permits, and chain-of-title records, as well as a personal interview with a nearby, long-term business owner.

In a March 27, 1992 report published by the Central Valley Regional Water Quality Control Board (RWQCB) entitled "Dry Cleaners - A Major Source of PCE in Ground Water," the authors discuss the results of a comprehensive investigation into the presence of significant concentrations of PCE and related compounds in ground water sampled from wells located in 7 central valley cities. The RWQCB concludes that data accumulated during their investigation strongly indicate that *leakage through sewer lines serving dry cleaners* has resulted in the presence of PCE in ground water within those cities.

Review of sampling data for wells located at the Unocal site indicates the highest historic concentrations of HVOCs, particularly PCE, are in samples collected from well MW-3. Ground water flow calculations from elevation data collected from wells between the years 1990 and 1995 show a predominant flow ranging from north to northwest. Gradient has been calculated as 0.002 ftft^{-1} or less, essentially flat, or "stagnant."

These data suggest that well MW-3 is: 1) closer to the source of the detected HVOCs than are the remaining wells in the network, or 2) in closer proximity to, or in better communication with, preferential contaminant migration pathways than are the remaining wells in the network. As was illustrated in the cited Central Valley RWQCB study, sewer lines and their (often) more permeable backfill materials present very favorable preferential

Mr. John McMorrow
RE: Hamlet Apts., 1319-159th Ave., San Leandro
February 6, 1996
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pathways for distribution of pollutants away from a source. Pollutant distribution from a particular source may even advance under such circumstances in directions which are *inconsistent* with calculated ground water flow directions.

This agency has not, to date, been presented with data of an evidentiary nature which would suggest that historic activities at the subject site are the source of, or contributed to, the presence of HVOCs in ground water identified during the UST leak investigation at the adjoining Unocal service station. On the contrary, there is a body of evidence (i.e., Central Valley RWQCB study) suggesting a fairly widespread occurrence of PCE in ground water from multiple potential sources as a result of leaking sewer lines.

In summary, based solely on the information made available to us by others, and as presented in the foregoing discussion, this agency does not have cause at this time to consider historic uses of the subject property as contributing to the presence of HVOCs in ground water below and adjacent to the subject site. Our position is subject to revision upon receipt of additional information or any other material change in circumstances indicating that there was an activity occurring at the subject site which contributed to the presence of the noted HVOCs.

Please call me at 510/567-6783 should you have any questions regarding the content of this letter.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Jun Makishima, Acting Director
Dale Klettke, ACDEH
Kevin Graves, RWQCB
Jacinto Soto, DTSC
David Camille, Unocal Corporation
Brett Bovee, ATC Environmental, Inc.

DK

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#1039

RAFAT A. SHAHID, Assistant Agency Director

Alameda County Environmental Health Dept.
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577
(510)567-6700 fax: (510)337-9335

January 25, 1996

Mr. James A. Phillipsen
3111 Marina Drive
Alameda, CA 94501

STID 1702

Re: Work plan for excavation at Former Alameda Max's Property, located at 1357 High Street, Alameda, California

Dear Mr. Phillipsen,

This office has reviewed Aqua Science Engineers' work plan, dated January 22, 1996, which proposes the destruction and replacement of Well MW-2 and overexcavation of the area adjacent to the former waste oil UST to eliminate the source of the observed floating oil in Well MW-2. However, according to the lab results from the last groundwater sampling event in December 1995, it appears that the floating oil has dissipated, leaving only a light sheen, probably due to the former operation of the oil skimmer in Well MW-2. Due to the present disappearance of the floating oil and the fact that, to date, this oil has not apparently migrated to the downgradient wells MW-1 and MW-3, located roughly 20 feet from Well MW-2, it appears that overexcavation is not required at this time.

In lieu of overexcavation, this office is requesting that quarterly groundwater monitoring resume for all four wells. However, if the floating oil reappears and persists, overexcavation will be reconsidered as an alternative to continued monitoring and skimming of Well MW-2, if it is found to be more cost effective, or if it can be shown that existing soil and groundwater contamination may potentially pose a threat to human health.

Recently, the State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Board (RWQCB) have determined Polynuclear Aromatic Hydrocarbons (PNAs) to be the chemicals of concern in TPHd when evaluating health and safety risk; and the American Society for Testing and Materials (ASTM), whose Risk-Based Corrective Action (RBCA) guidelines were recently incorporated into RWQCB's interim guidelines (see attached), has come up with protective health levels for two of the PNAs, (naphthalene and benzo(a)pyrenes). This office is requesting that the next groundwater sample collected from Well MW-2 be analyzed for PNAs, in addition to TPHg, TPHd, TOG, BTEX, and halogenated volatiles for the following reasons: 1) The recently developed concerns surrounding the potential health hazards of PNAs; 2) the concentrations of PNAs identified in the initial soil sample collected from the

Mr. James A. Phillipsen
Re: 1357 High St.
January 25, 1996
Page 2 of 2

former waste oil tank pit; and 3) the elevated levels of TPHd identified in the soil sample collected from Well MW-2.

This office is also requesting that at least one soil sample be collected from the vicinity of Well MW-2 and be analyzed for PNAs to aid in more accurately assessing any potential threat to human health from on-site soils. It is advisable to begin looking at the human health risks associated with the remaining soil and groundwater contaminants to establish acceptable human health protective cleanup levels for residential exposure at the site. The RWQCB has suggested that ASTM RBCA's tiered approach be used as protocol/guidelines for determining human health risk assessments. The initial tier, Tier 1, of this approach provides a look-up table and a more simplified alternative to conducting an elaborate human health risk assessment for some of the contaminants of concern. Other risk assessment resources will obviously be needed in cases where ASTM RBCA does not cover contaminant constituents. Please be aware, though, that some of the parameters used to establish the Tier 1 levels are less conservative than the actual site parameters (e.g., the depth-to-water parameter used for Tier 1 is 300cm or roughly 9-feet below ground surface).

The next quarterly monitoring event should be conducted by March 1995. If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,



Juliet Shin
Senior Hazardous Materials Specialist

ATTACHMENT

gk cc: Robert E. Kitay
Aqua Science Engineers, Inc.
2411 Old Crow Canyon Road #4
San Ramon, CA 94583

Acting Chief-File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R01039

RAFAT A. SHAHID, Assistant Agency Director

STID 2422

August 9, 1995

Mr. David J. Camille
Unocal Corporation
2000 Crow Canyon Place, Suite 400
P. O. Box 5155
San Ramon, CA 94583

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

RE: UNOCAL, 15803 EAST 14TH STREET, SAN LEANDRO

Dear Mr. Camille,

This letter follows review of the case file for this site, up to and including the July 14, 1995 MPDS Services quarterly monitoring report. This correspondence is in specific regards to the draft version of the "Non-Attainment Area Management Plan" (NAA Plan), prepared by Pacific Environmental Group, Inc., dated November 7, 1994. Proposed revisions to this NAA Plan were discussed during a meeting in late 1994 with Scott Seery of this office and Kevin Graves of the San Francisco Bay Regional Water Quality Control Board (RWQCB). As per a telephone conversation on August 8, 1995 between myself and Michael Hurd, CEG, of Pacific Environmental Group, Inc., the following concerns were reiterated:

- There is a need for an additional groundwater monitoring well down gradient of MW-1
- Recently requested reductions in the well sampling frequencies need to be incorporated into the revised NAA plan

These are just a couple of the items which were discussed during the late 1994 meeting. Mr. Hurd informed me that the NAA Plan was being revised, and was presently being reviewed by your company.

Please submit the revised NAA management plan as soon as it has been completed. We will be conferring with the RWQCB during its review to ensure adherence with the NAA objectives.

I have recently taken over management of this case from Scott Seery of this office. Should you have any questions concerning this matter, please feel free to contact me at (510)567-6880.

Sincerely,

Dale Klettke, CHMM
Hazardous Materials Specialist

Mr. David J. Camille
RE: 15803 East 14th Street
August 9, 1995
Page 2 of 2

c: Thomas Peacock, Acting Chief, Hazardous Materials Division--files
Gil Jensen, Alameda County District Attorneys Office
Ed Laudani, Alameda County Fire Department
Kevin Graves, RWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R01039

RAFAT A. SHAHID, Assistant Agency Director

July 27, 1993
STID # 6277 2422

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

Mr. Syed Rizvi
Unocal, Environmental Compliance
911 Wilshire Blvd., Floor 11
Los Angeles, CA 90017

Re: FIVE YEAR UNDERGROUND STORAGE TANK PERMIT AT,
UNOCAL #6277, 15803 EAST 14th STREET, SAN LEANDRO, CA.

Dear Mr. Rizvi:

Please find enclosed a five year permit to operate the tanks at the above referenced facility. According to our records these tanks are double-walled with fiberglass coating. The associated piping is also double-walled, with fiberglass secondary piping.

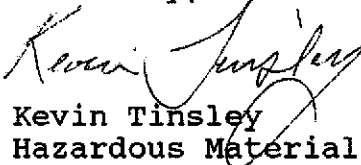
To maintain a valid permit, you are required to comply with the conditions in Title 23 of the California Code of Regulations (CCR). Based on these requirements, both fuel tanks, waste oil tank and piping are monitored by an electronic alarm system. Leak monitoring is continuous through sensors located in the annular spaces and piping sumps of each tank.

During the inspection conducted on July 7, 1993, the rubber boot pressure fitting appeared to be tight around the secondary piping, for both fuel tanks. These boots should be examine and dislodged as needed to allow a potential released to flow into the sump, for detection.

You may consult the revised Title 23, CCR for additional requirements. To obtain a copy of the regulations, you may contact the State Water Resources Control Board at (916) 657-0917.

If you have any questions regarding the permit to operate, do not hesitate to contact me at (510) 271-4320, Monday through Thursday.

Sincerely,



Kevin Tinsley
Hazardous Materials Specialist

c, Edgar Howell, Chief - files (kt)
Brian Oliva, Hazardous Materials Specialist
Ken Peacock, Unocal Dealer

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01039

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

STID 2422

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 6, 1993

Mr. Dave Camille
Unocal Corporation
2000 Crow Canyon Place, Ste. 400
P.O. Box 5155
San Ramon, CA 94583

RE: UNOCAL STATION #6277, 15803 E. 14TH STREET, SAN LEANDRO

Dear Mr. Camille:

Thank you for the recent submittal of the December 17, 1992 Kaprealian Engineering, Inc. (KEI) revised work plan for the installation of additional off-site wells. This document modifies a prior KEI work plan dated July 23, 1991.

The referenced December 17, 1992 work plan has been approved as submitted. Please inform this office once the off-site access agreement has been signed by all affected parties, and field work is slated to begin.

Please call me at 510/271-4530, or -4320, should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Env. Health
Gil Jensen, Alameda County District Attorney's Office
John Jang, RWQCB
Jim Ferdinand, Eden Consolidated Fire Protection District
Paul Andrews, Andrews and Associates
Matthew Coelho
Ed Howell - files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R01039

RAFAT A. SHAHID, Assistant Agency Director

STID #2422

May 6, 1992

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

Ms. Penny Silzer
Unocal Corporation
2000 Crow Canyon Place, Suite 400
P.O. Box 5155
San Ramon, CA 94583

RE: UNOCAL STATION #6277, 15803 EAST 14TH STREET, SAN LEANDRO

Dear Ms. Silzer:

The Department is in receipt and has completed review of the February 24, 1992 Kaprealian Engineering, Inc. (KEI) report documenting work performed at the subject site from October 1991 through January 1992.

The referenced report indicates that an attempt to install an additional downgradient monitoring well (designated MW-5) failed as a result of an underground obstruction beneath the sidewalk where the boring was advanced. We understand that an additional attempt at well installation will occur in the same general area once an unobscured site for drilling is found.

Please be advised that our review of laboratory and gradient data indicates that additional (off-site) wells down- and cross-gradient (west and north) from well MW-2A are needed to assess the full extent of ground water contamination migrating from the subject site. The referenced February 24, 1992 KEI report indicates that Unocal was denied access to the adjacent private property in the past. Unocal will need to gain access to this property in the very near future for the purpose of well installations and monitoring. Please contact the undersigned to discuss this matter in more detail, including the statutory authority for allowing such access during underground storage tank investigations.

At this time, and until further notice, ground water samples collected from all wells, both present and proposed, shall be analyzed for the following waste oil constituents, in addition to those fuel compounds already being sought:

- o halogenated hydrocarbons (EPA method 601 or 624)
- o total petroleum hydrocarbons as diesel (DHS/LUFT methods)

Ms. Penny Silzer
RE: Unocal #6277, 15803 E.14th Street
May 6, 1992
Page 2 of 2

This requirement is based on the historical fluctuations in ground water gradients at the site, and "hits" noted in all wells in the past.

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

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Rich Hiatt, RWQCB
Howard Natayama, DHS
Jim Ferdinand, Eden Consolidated Fire District

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R01039

December 26, 1991

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

Mr. Ron Bock
Unocal Corporation
2000 Crow Canyon Road, Ste. 400
San Ramon, CA 94583

RE: CAL-EPA REGIONAL HYDROGEOLOGY AND CONTAMINATION STUDY, CENTRAL
SAN LEANDRO

Dear Mr. Bock:

The California Environmental Protection Agency (Cal-EPA), Department of Toxic Substance Control (DTSC), has been investigating the presence of several priority pollutants, primarily volatile organic compounds (VOC), heavy metals, and nitrates, in soil and ground water occurring in the central San Leandro area since approximately 1986. Currently, six sites are being investigated with Cal-EPA lead or oversight, as follows:

- o 139th Avenue site (Cal-EPA lead)
- o Factor Avenue site (Cal-EPA lead)
- o Singer-Friden site (Cal-EPA lead)
- o Caterpillar site (Cal-EPA oversight)
- o Hudson ICS (Cal-EPA oversight)
- o Staefa Control System Inc./2481 Washington Avenue (Cal-EPA oversight)

Because of similar contamination found at these sites, DTSC suspects that a larger, regional contamination problem exists that requires further investigation. Presently, DTSC is conducting a Regional Hydrology and Contamination Study in Central San Leandro. The purposes of this study include, among other elements:

- o defining as far as possible the known vertical and horizontal extent of contamination in the area;
- o identifying existing public and/or private wells that can be used by DTSC for monitoring purposes;
- o instituting coordinated sampling; and,
- o defining the hydrogeology of the area.

Mr. Bock
RE: Cal-EPA VOC Study
December 26, 1991
Page 2 of 3

The intent of the DTSC study is to develop the best possible data on the extent of contamination while realizing no unnecessary expenditure of public funds. Following the presentation of the study's final report, DTSC will develop a work plan for conducting further study, targeting potential source areas and "hot spots" identified during the course of this phase of the investigation.

The DTSC has requested Alameda County's assistance in developing this study and report by coordinating ground water sampling efforts for those sites under county lead. To meet this goal, you are requested, on a volunteer basis, to supplement the sampling slated to occur at your site(s), listed below, during January - March 1992, in addition to those sampling/monitoring activities already required, as follows:

- 1) Collect and analyze ground water samples from at least one well for VOCs (EPA Method 624, or 601/602). The well sampled for this task is to be chosen based upon its potential for detection of VOCs relative to other wells on-site, i.e., its proximity downgradient of a former waste oil or solvent underground storage tank, VOCs identified in prior analyses, etc.
- 2) Present this data, along with other requisite sampling/monitoring data, in the 1992 first quarter report. Submit a copy of this report directly to the DTSC, at the following address:

California Environmental Protection Agency
Department of Toxic Substance Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710
Attn: Eileen Hughes

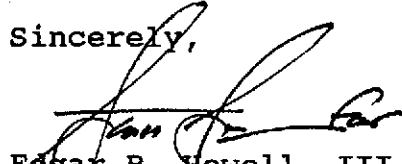
The sites affected by this request are as follow:

- (R0371) o #7004, 15599 Hesperian Blvd.
- (R0300) o #2512, 1300 Davis Street.
- (R0366) o #3292, 15008 E. 14th Street
- (R01039) o _____, 15803 E. 14th Street
- (R0877) o _____, 1499 Farnsworth Street

Mr. Bock
RE: Cal-EPA VOC study
December 26, 1991
Page 3 of 3

Thank you in advance for your cooperation in this matter. Please feel free to contact Mr. Scott Seery of this Division at 510/271-4320, or Ms. Eileen Hughes of DTSC at 510/540-3848, should you have any questions.

Sincerely,



Edgar B. Howell, III
Chief, Hazardous Materials Division

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Eileen Hughes, DTSC
Mike Bakaldin, San Leandro Fire Department
Jim Ferdinand, Eden Consolidated Fire District

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R01039

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

December 2, 1991

Mr. Ron Bock
Unocal Corporation
2000 Crow Canyon Place, Suite 400
San Ramon, CA 94583

RE: Unocal #6277, 15803 East 14th Street, San Leandro, CA

Dear Mr. Bock:

I have reviewed your workplan/proposal dated July 23, 1991, that was prepared by Kaprealian Engineering, Inc. It is accepted. Please forward to this office within 10 days of the receipt of this letter the estimated time schedule for this work.

If you have questions, please contact me at 271-4320.

Sincerely,



Larry Seto

Sr. Hazardous Materials Specialist

cc: City of San Leandro Fire
Gil Jensen, Alameda County District Attorney's Office,
Consumer and Environmental Protection

RWQCB

Howard Hatayama, DTSC

Rafat Shahid, Assistant Agency Director, Environmental Health

Tim Ross, Kaprealian Engineering

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R01039

Certified Mail #P 062 128 312

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

November 16, 1990

Mr. Tim Ross
Unocal Corporation
2175 N. California Blvd., Suite 650
Walnut Creek, CA 94569

RE: Unocal Station #6277, 15803 E. 14th St.,
San Leandro, CA 94577

Dear Mr. Ross:

We have not received any quarterly monitoring well results from the well at the above site. Please submit within ten (10) days of the receipt of this letter, all of your monitoring wells quarterly reports from the date of installation (5/89).

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

Sincerely,


Larry Seto, Senior,
Hazardous Materials Specialist

LS:mnc

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

RWQCB

Charlene Williams, DOHS

Rafat A. Shahid, Assistant Agency Director, Environmental Health
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES



Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

DAVID J. KEARS AGENCY
S [REDACTED] Agency Director

R01039

Certified Mail # P 833 981 233

~~XXXXXXXXXXXXXXXXXXXX~~
~~XXXXXXXXXXXXXXXXXXXX~~
(415) 271-4320

February 15, 1989

Mr. R.L. Folda, Manager of
Maintenance and Construction
Unocal Corporation
P.O. Box 8175
Walnut Creek, CA 94596

RE: Unocal, 15803 E. 14th Street, San Leandro, CA 94578

Dear Mr. Folda:

We have received your precision test results dated February 1, 1989, for two (2) underground tanks at the above location from Paradiso Construction. Both tanks failed

Please submit to our office within five (5) days from the receipt of this letter, your investigative plan.

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

Sincerely,

Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:mnc

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Lisa McCann, RWQCB
Chief McCammon, San Leandro Fire
Doug Krause, DOHS