AGENCY



2001 01-19-06

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700

FAX (510) 337-9335

DAVID J. KEARS, Agency Director

January 19, 2006

Mr. Roger Woodward RL Woodward Industries P.O. Box 2688 **Dublin, CA 94568**

Mr. Kewal Singh Corwood Carwash 6973 Village Parkway **Dublin, CA 94568**

Dear Messrs. Woodward and Singh:

Subject: Fuel Leak Site, RO0002432, Corwood Carwash, 6973 Village Parkway, Dublin, CA, 94568

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including the January 7, 2005 Revised SWI Workplan prepared by Gribi Associates. This work plan responds to the County's previous May 15, 2004 letter requesting additional information and sampling. The work plan also includes a conduit/well survey and a descriptive site conceptual model along with the revised work plan. The work plan proposes seven boring locations for the sampling of depth discrete soil and groundwater samples, with the intention to verify the three dimensional distribution of residual hydrocarbon contamination and ultimately obtain site closure. We request that you address the following technical comments when performing the proposed work and submit the technical report requested below.

TECHNICAL COMMENTS

- Source area characterization- The lateral and vertical extent of contamination in soil and groundwater in the source areas has not yet been determined and is not addressed in the submitted work plan. Therefore, we request additional borings within and up-gradient of the dispenser areas to complete source area characterization. This work will either confirm or refute the assumption of the proposed SCM that the source is a "small area associated with the east fuel dispenser".
- 2. Plume characterization- Based upon groundwater gradient from previous monitoring. it appears that the groundwater flow is south-southeasterly. Therefore, we request that an additional boring be advanced immediately down-gradient of the former west dispenser, where residual contamination was detected.

The pattern of the proposed borings immediately down-gradient of the car wash building does not represent a realistic expectation of the plume shape and does not incorporate the previous investigation results. In the absence of preferential pathways, the plume is expected to migrate laterally in the direction of groundwater flow. The proposed borings #2,4,5 &6 appear to be at the fringes of the anticipated

Messrs. Woodward and Singh January 19, 2006 Page 2 of 4

plume and would not allow significant refinement of the plume's dimension. The plume is more likely located between the east-west boundaries' of the car wash, therefore, borings would be better located between IB-3 and IB-4 and between IB-3 and boring 4. The need, the number and locations of the southernmost borings, proposed on the Midas Muffler property should reflect what is found in the borings along the southern property boundary and should be a part of the dynamic expedited site assessment. The goal is to provide both a planar and cross-section representation of the plume in your final report.

3. Soil and Groundwater Sampling and Analysis- The borings are proposed to be drilled to a depth of 50' and is based upon the presence of a shallow water bearing zone above 20' and the absence of multiple water bearings below this depth. If specific water bearing zones are identified during logging, groundwater samples will be collected from an adjacent borehole from the noted intervals. Soil samples will be analyzed based upon screening results ie odor, staining or elevated instrument readings and from locations of obvious lithologic change. In addition to the proposed parameters, TPHg, BTEX, oxygenates and lead scavengers, we request that TPHd be also run on the soil and groundwater samples.

TECHNICAL REPORT REQUEST

- January 31, 2006- Revised boring location figure (e mail).
- April 20, 2006- Soil and Groundwater Investigation Report
- April 20, 2006- Groundwater sampling report for MW-1

ELECTRONIC SUBMITTAL OF REPORTS

Effective January 31, 2006, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic reporting).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide

Messrs. Woodward and Singh January 19, 2006 Page 3 of 4

current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Messrs. Woodward and Singh January 19, 2006 Page 4 of 4

If you have any questions, please call me at (510) 567-6765.

Sincerely,

Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos

Mr. James Gribi, Gribi Associates, 1090 Adams St., Ste. K, Benicia, CA 94510

Matt Katen, Zone 7 Water Agency

1_18_06 6973 Village Parkway





DAVID J. KEARS, Agency Director

May 14, 2004

Mr. Roger Woodward **RL** Woodward Industries P.O. Box 2688 Dublin, CA 94568

Mr. Kewal Singh Corwood Carwash 6973 Village Parkway Dublin, CA 94568

ENVIRONMENTAL HEALTH SERVICES

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

Subject: RO 2432, Corwood Carwash, 6873 Village Parkway, Dublin, CA

Dear Messrs. Woodward and Singh:

Alameda County Department of Environmental Health (ACDEH) staff has received the "Work Plan to Conduct Additional Site Characterization Activities," dated July 16, 2003, prepared by Gribi Associates (Gribi) and transmitted via facsimile on July 17, 2003. We have examined the technical elements of the work plan and determined that it failed to comply with the scope of work requested in the ACDEH correspondence dated January 31, 2003. Consequently, the July 16, 2003 Gribi work plan has been rejected, as outlined, below.

At this time we request that you prepare and submit, by June 15, 2004, an acceptable SWI work plan that complies with the tasks outlined in the January 31, 2003 ACDEH correspondence, and each of the following comments.

WORK PLAN DEFICIENCIES

Following are examples of deficiencies in Gribi's "Work Plan to Conduct Additional Site Characterization Activities," dated July 16, 2003, that render this work plan unacceptable. These deficiencies are substantial enough to cause ACDEH to reject the work plan.

Site Conceptual Model - An SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point the SCM is considered "validated". The validated SCM forms the foundation for developing the most cost-effective final Corrective Action Plan (CAP).

Messrs. Woodward and Singh

Re: Corwood Carwash, 6873 Village Parkway, Dublin

May 15, 2004 Page 2 of 4

The referenced January 31, 2003 ACDEH correspondence specifically requested that a Site Conceptual Model (SCM) be developed for this site. The scope of work presented in the Soil and Water Investigation (SWI) work plan was to be substantially based on the SCM and results of a conduit/preferential pathway study, an element of the SCM. Completion of the conduit/preferential pathway study was also requested by ACDEH in the referenced correspondence.

Neither an SCM nor conduit/preferential pathway study was presented in the Gribi work plan. We presume that the conduit/preferential pathway study was not completed, as no reference to such a study was made in the work plan. Hence, the work plan failed to satisfy the critical task of evaluating the SCM before scoping of the pending SWI.

2) Soil Borings – The intent of the SWI work plan was to provide a three-dimensional assessment of impacts, including the demarcation of potential geogenic and anthropogenic flow pathways and their consequent contribution to the preferential migration of pollutants from the source area, and to further the refinement of the SCM. The Gribi work plan proposes the emplacement of just two (2) soil borings. Boring locations appear to be arbitrary, however, as no justification for their locations is presented. Further, no discussion of the SCM or conduit/preferential pathway study is provided.

The scope of the Gribi work plan fails to provide a comprehensive approach that is consistent with the technical elements now dictated by the technical guidance now available from the scientific community and petroleum industry think tanks to aid the investigation of fuels containing oxygenates, e.g., MtBE. The current state of the art requires, among numerous other components, that oxygenate investigations include transects of continuously cored sampling points from which depth-discrete soil and water samples are collected

CONCLUSION

In summary, the Gribi work plan did not comply with the fundamental requests made in the January 31, 2003 ACDEH correspondence. The work plan did not reflect the current technical approach now accepted as appropriate for the investigation of fuels containing oxygenates. Further, the work plan was not presented under cover, signed under penalty of perjury, by the Responsible Party(ies) who have taken a lead role in compliance with corrective action directives.

Your attention is directed to the document entitled "Strategies for Characterizing Subsurface Releases of Gasoline Containing MtBE", American Petroleum Institute Publication No. 4699, dated February 2000, and to the State Water Resources Control Board (SWRCB) "Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Final Draft", dated March 27, 2000 to assist in development of your SCM and scoping an appropriate investigation. In addition, technical protocol for expedited site assessments are provide in the US EPA "Expedited Site Assessment Tools for Underground Storage Tank Sites: A guide for Regulators" (EPA 510-B-97-001), dated March 1997.

Messrs. Woodward and Singh Re: Corwood Carwash, 6873 Village Parkway, Dublin May 15, 2004 Page 3 of 4

TECHINCAL REPORT REQUEST

Please submit technical reports according to, or otherwise comply with, the following schedule:

June 15, 2003 – Work plan for Soil and Water Investigation

60 Days from SWI Work Plan Approval – Soil and Water Investigation Report (which contains the results of the SWI assessment work, and a proposal for additional work, as needed, to refine the SCM)

These reports and work plans are being requested pursuant to the Regional Board's authority under Section 13267(b) of the California Water Code. Each technical report shall include conclusions and recommendations for the next phases of work required at the site should more appear necessary to refine the SCM. We request that all required work be performed in a prompt and timely manner, as suggested by the noted schedule, above. Revisions to this schedule shall be requested in writing with appropriate justification for anticipated delays.

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that all work plans and technical reports containing professional geologic or engineering evaluations and/or judgments be completed under the direction of an appropriately-registered or certified professional. This registered or certified professional shall sign and wet stamp all such reports and work plans.

All reports and work plans are to be submitted under cover, signed under penalty of perjury, by the Responsible Party(ies) who have taken a lead role in compliance with corrective action directives.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will refer your case to the County District Attorney, for enforcement follow up. Enforcement follow up may include administrative action or monetary penalties of up to \$10,000 per day for each day of violation of the California Health and Safety Code, Division 20, Chapter 6.75.

If you have any questions please call Mr. Scott Seery at (510) 567-6783.

Sincerely,

Scott O. Seerly, R.G., CHMM Hazardous Materials Specialist Messrs. Woodward and Singh Re: Corwood Carwash, 6873 Village Parkway, Dublin May 15, 2004 Page 4 of 4

c: Betty Graham, RWQCB
Dave Charter, SWRCB UST Fund
Matt Katen, Zone 7 Water Agency
James Gribi, Gribi Assoc., 1350 Hayes St., Ste. C-14, Benicia, CA 94510
Christine Noma, Wendel Rosen Black & Dean
1111 Broadway, 24th Fl., Oakland, CA 94607

HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

RO0002432

June 17, 2003

Mr. Roger Woodward RL Woodward Industries P.O. Box 2688 Dublin, CA 94568

Mr. Kewal Singh Corwood Carwash 6973 Village Parkway Dublin, CA 94568 **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: SWI for Corwood Carwash, 6973 Village Parkway, Dublin, CA

Dear Messrs. Woodward and Singh:

In correspondence from this office dated January 31, 2003, you were directed to submit a Soil and Water Investigation (SWI) workplan within 45 days, or by March 17, 2003. To date, the referenced SWI work plan has not been received. We are in receipt, however, of the March 7, 2003 Gribi Associates groundwater monitoring report in which regulatory case closure was, again, requested for this case. As articulated in the cited January 31, 2003 correspondence, further assessment of MtBE impacts is required before case closure will be considered.

You are currently in violation of California Water Code Sec. 13267(b) and provisions of Article 11, Title 23, California Code of Regulations for failure to submit the requested SWI workplan. California Health and Safety Code Sec. 25299 provides for civil penalties of up to \$5000 per day, per violation, for violations of this sort. In addition, failure to comply with directives from this office may result in your ineligibility to receive funding through the State Water Resources Control Board (SWRCB) Underground Storage Tank Trust Fund.

At this time, you are directed to submit the subject SWI workplan no later than <u>July 17, 2003</u>. Failure to do so will result in this case being referred to the Alameda County District Attorney's Office for potential enforcement action.

Please be advised that this decision is subject to appeal to the State Water Resources Control Board (SWRCB), pursuant to Sections 25296.40, 25297.1, and 25299.39.2 of the California Health & Safety Code. Please contact the SWRCB Underground Storage Tank Program at (916) 341-5851 for information regarding the appeal process. Petitions must be filed within 30 days from the date of this letter.

If you have any questions, I can be reached at (510) 567-6783.

Sincerely,

Scott S. Serry, R.G., CHMM Hazardous Materials Specialist Messrs. Woodward and Singh Re: 6973 Village Parkway, Dublin June 17, 2003 Page 2 of 2

c: Betty Graham, RWQCB Shari Knieriem, SWRCB UST Fund Matt Katen, Zone 7 Water Agency D. Drogos, R. Weston

AGENCY



06-11-02

DAVID J. KEARS, Agency Director

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

RO0002432

June 10, 2002

Mr. Roger Woodward RL Woodward Industries, Inc P.O. Box 2688 Dublin, CA 94568

SUBJECT: INTENT TO MAKE A DETERMINATION THAT NO FURTHER ACTION IS REQUIRED <u>OR</u> ISSUE A CLOSURE LETTER FOR 6973 VILLAGE PARKWAY, DUBLIN, CA

Dear Mr. Woodward:

This letter is to inform you that Alameda County Environmental Protection (LOP) intends to make a determination that no further action is required at the above site or to issue a closure letter. 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 me at (510) 567-6762.

Sincerely,

eva chu

Hazardous Materials Specialist

c: Chuck Headlee, RWQCB

William McCammon, Alameda County Fire Dept, QIC Code 41401

corwood-24

AGENCY



· 11-20-01

DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES

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

R00002432

November 19, 2001

Mr. Roger Woodward P.O. Box 2688 Dublin, CA 94568

RE: Sensitive Receptor Survey for 6973 Village Parkway, Dublin, CA 94568

Dear Mr. Woodward:

I have completed review of Gribi Associates' September 2001 Report of Groundwater Monitoring Conducted on July 27, 2001 and the case file for the above referenced site. Subsurface investigations conducted to date have identified approximately 1,000ppb MTBE in groundwater beneath the site. The extent of the plume has not been delineated. However, assuming that the plume is relative short in length, and it is demonstrated that there are no sensitive receptors that may be impacted by the plume, the case can still be closed. Therefore, please have a sensitive receptor survey prepared for the site.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

email: James Gribi





07-09-01

DAVID J. KEARS, Agency Director

R00002432

July 3, 2001

Mr. Roger Woodward P.O. Box 2688 Dublin, CA 94568 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

RE: Quarterly Groundwater Monitoring at 6973 Village Parkway, Dublin, CA

Dear Mr. Woodward:

I have completed review of Gribi Associates' March 2001 Report of Soil, Soil Vapor, and Groundwater Sampling prepared for the above referenced site. That report summarized the advancement of two soil borings (IB-3 and IB-4), the collection of a soil vapor sample (VS-1), and the installation of a groundwater monitoring well (MW-1) at the site. Soil from boring MW-1 contained up to 4,600ppm TPHd and 850ppm TPHg. Groundwater from well MW-1 contained up to 670ppb TPHg and 1,700ppb MTBE. Grab groundwater samples from IB-3 contained 150ppb TPHg and 390ppb MTBE. The soil vapor sample contained low levels of BTEX constituents.

At this time, please continue with quarterly groundwater monitoring of well MW-1. Groundwater should be analyzed for TPHg, TPHd, BTEX, and MTBE.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

email: James Gribi

AGENCY





swt 3-21-2020-

202890 (c)

ENVIRONMENTAL HEALTH SERVICES

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

StID 696

March 20, 2000

Mr. Roger Woodward P.O.Box 2688 Dublin, CA 94568

RE: Work Plan Approval for 6973 Village Parkway, Dublin, CA

Dear Mr. Woodward:

I have completed review of Gribi Associates' March 20, 2000 facsimile transmittal of a work plan entitled *Workplan to Conduct Site Closure Activities* prepared for the above referenced site. The proposal to install one groundwater monitoring well downgradient from the former east fuel dispenser, to drill two exploratory borings downgradient of former Boring IB-1 and IB-2, and to collect a soil vapor sample beneath the Corwood Car Wash cashier's kiosk is acceptable. It is recommended that a soil sample be collected from the vadose zone (of the boring proposed downgradient of former Boring IB-2) for soil parameter measurements (bulk density, total organic carbon content, water content, and porosity). Data collected from this investigation will be used to prepare a Risk-Based Corrective Action (RBCA) assessemnt.

Field activities should commence within 90 days of the date of this letter. Please provide 72 hours notice prior to the start of field work. I will be away from the office until April 17, 2000. In the meantime, if you have any general questions about the site, you may contact Mr. Barney Chan at (510) 567-6765).

eva chu

Hazardous Materials Specialist

email: Jim Gribi (jegribi@email.msn.com)

Barney Chan (bchan@co.alameda.ca.us)

SWT 105 3-2.2.

ALAMEDA COUNTY HEALTH CARE SERVICES





1202432

ENVIRONMENTAL HEALTH SERVICES

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

StID 696

March 1, 2000

Mr. Roger Woodward P.O.Box 2688 Dublin, CA 94568

RE: Work Plan Approval for 6973 Village Parkway, Dublin, CA

Dear Mr. Woodward:

I have completed review of Gribi Associates' March 1, 2000 facsimile transmittal of a work plan entitled *Workplan to Conduct Soil and Groundwater Investigation* prepared for the above referenced site. The proposal to advance two soil borings immediately south of the former tank complex to collect soil and grab groundwater samples is acceptable. All samples will be analyzed for TPHg, TPHd, BTEX, and MTBE. In addition, the grab groundwater samples should be analyzed for MTBE and other oxygenates (EDB, TBA, etc.) using EPA Method 8260 or comparable. A report summarizing this phase of the investigation is due within 60 days upon completion of field work.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

email: Jim Gribi (jegribi@email.msn.com)



T 2-29-2000 nell ee's

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700 FAX (510) 337-9335 PO2432 6)

2890 (C)

StID 696

February 28, 2000

Mr. Roger Woodward P.O.Box 2688 Dublin, CA 94568

RE: Soil Borings at 6973 Village Parkway, Dublin, CA

AGENCY

DAVID J. KEARS, Agency Director

Dear Mr. Woodward:

I have completed review of Gribi Associates' facsimile transmittal of an abbreviated Report of Underground Storage Tank Removal Activities, dated February 28, 2000. That report summarized UST removal, soil and groundwater sampling activities conducted at the above referenced site in January 31 through February 21, 2000. Laboratory analytical data revealed moderate levels of diesel and gasoline constituents in soil and groundwater.

At this time, in order to delineate the extent of groundwater contamination, it is recommended that a minimum of two soil borings be advanced at the site (one downgradient of the former tank pit, and one downgradient of the former dispensers) and grab groundwater samples be collected from each borehole. A workplan for the advancement of the soil borings should be submitted to this office for review.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

email: Jim Gribi (jegribi@email.msn.com)

ALAMEDA COUNTY

HEALTH CARE SERVICES





VRO# 2432

Ro# 2890

Certified Mailer #: P 368 729 435

DAVID J. KEARS, Agency Director

July 23, 1999

Roger L. Woodward, President R. L. Woodward Industries Inc. P. O. Box 2688 Dublin CA 94568 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700

STOP 696

RE: Removal of Underground Storage Tanks (USTs) at Corwood Carwash, 6973 Village Parkway, Dublin CA 94568

Dear Mr. Woodward:

This office has received your letter dated June 30, 1999. Apparently you were confused as to the meaning of the temporary closure provisions of Title 23 and the procedures of this office in enforcing those provisions.

Accordingly, this office is willing to give you the benefit of the doubt regarding the permanent closure (removal) of the underground storage tanks at the above site.

However, in order for this office to permit you to remove the tanks no later than November 15, 1999 you are required to submit a written plan for the removal of the tanks. The closure plan was mailed to you with the June 7, 1999 letter. The completed closure plan with permit fees is required to be submitted no later than **September 1, 1999**. Include with the closure plan a check made payable to "Treasurer, County of Alameda" in the sum of \$993.00.

If you have any questions regarding this letter you can contact me at (510) 567-6781.

Sincenely,

Robert Weston

Senior Hazardous Materials Specialist

c: Tom Peacock, ACDEP-files Bob Chambers, Alameda County District Attorney's Office Catherine Johnson, Wendel, Rosen, Black & Dean, 1111 Broadway, 24th Floor, Oakland CA 94607



DAVID J. KEARS, Agency Director



PO2432

Certified Mailer #: Z 115 363 845

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

June 7, 1999

Catherine Johnson Wendel, Rosen, Black & Dean 1111 Broadway, 24th Floor Oakland CA 94607

RE: Underground Storage Tanks (USTs) at Corwood Carwash, 6973 Village Parkway, Dublin CA 94568

Dear Ms. Johnson:

This office received a telephone call from you this morning inquiring about the status of the temporary closure for the two USTs at the site. You stated that you are acting on behalf of the site owner, Roger Woodward.

In our telephone conversation you mentioned a statement made by me to Ms. Mazza, the alternate contact person for the business. In that previous conversation the requirement to remove the USTs by July 1, 1999 had been stated. The reason for the July 1 deadline is due to several factors. A finding that the cathodic protection system was found defective and not operating properly during January 1998. Subsequent repairs in July 1998 failed to make the system operational. No further repairs have been made. Mr. Woodward has historically been recalcitrant in providing information required by this office for the operation of the tanks. On numerous occasions this office has requested information from Mr. Woodward for the purpose of verifying regulatory compliance. The verification process for the December 22, 1998 deadline started on December 31, 1997. Mr. Woodward was given almost a full year lead time to assure that the station conformed with all the requirements. A follow-up letter was sent on January 27, 1998 explaining the options for tank leak detection. No response to either letter was received from Mr. Woodward. On March 3, 1998 a Notice of Violation was sent addressing the issues previously requested on December 31, 1997.

On March 25, 1998 documents were finally received from Mr. Woodward partially addressing the requirements stated in the Corwood Carwash 6973 Village Parkway Dublin CA 94568 page 2 of 3

previous letters.

On April 15, Mr. Woodward and I had a telephone conversation regarding the methods used for tank leak detection. A Notice of Stoppage of fuel delivery letter was mailed on July 15, 1998. The notice was necessary because the station did not meet the minimum standards for tanks on the upcoming deadline of December 22, 1998. This after a letter sent seven months earlier warning of the impending deadline.

The Second Notice of Violation was sent on October 15, 1998 to Mr. Woodward. These ongoing violations were for failure to provide documents required as a condition of the permit to operate. The first request for documents was on December 31, 1997 and ten months later the permit conditions are still being violated by Mr. Woodward.

On November 16, 1998 a letter requesting temporary closure was received by this office. With that letter Mr. Woodward attaches a letter from Corrosion Engineering Associates Inc., which states that the cathodic protection system has failed and has been out of service since at least January 1998. According to the letter from Corrosion Engineering Associates Inc., the cost of repairing the system was estimated at \$9,800. According to Mr. Woodward, the lack of gasoline sales did not warrant the continued operation of the USTs and the high cost of repairing the impressed current cathodic protection. Furthermore in the November 1998 letter Mr. Woodward stated that the use of the tanks would ultimately be discontinued.

One of the compliance issues requested by this office was the cathodic protection test results. The cathodic protection system is required to be certified, by a cathodic protection tester, that the system is operating properly. That system protects the bare steel of the single wall tank against pitting and leaks from holes in the tank.

This office has not granted a temporary closure to the Corwood Carwash USTs. The USTs do not fulfill the criteria of temporary closure since the product has not been emptied and the cathodic protection has failed. Tanks cannot be temporarily closed to delay the cost of removal.

Accordingly, a written plan for either the continued operation of the tanks at the site or the removal of the tanks is required to be submitted by July 1, 1999. Include in the operating plan a Corwood Carwash 6973 Village Parkway Dublin CA 94568 page 3 of 3

submittal of all documents to satisfy previous requests by this office. If the tanks are **not** planned to be placed back into service then a closure plan shall be submitted by July 1, 1999 for the removal of the two tanks in a timely manner. A timely manner would be no later than August 1999.

A copy of correspondence between this office and Mr. Woodward is enclosed along with a Tank Closure Permit Application.

If you have any questions regarding this letter you can contact me at (510) 567-6781.

Sincerely,

Robert Weston

Senior Hazardous Materials Specialist

enclosures

wo/enclosures

c: Tom Peacock, ACDEP-files
Bob Chambers, Alameda County District Attorney's Office

AGENCY

DAVID J. KEARS, Agency Director



VRO 2432 (LOP)
RO 2890 (SELE)
RAFAT A. SHAHID, DIRECTOR

November 22, 1995

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

Roger Woodward Corwood Car Wash P.O. Box 2688 Dublin, CA 94568

Subject: Permit conditions for the operation of two underground storage tanks located at 6973 Village Parkway, Dublin

Dear Mr. Woodward:

The purpose of this letter is to document the conditions under which you are required to operate the two underground storage tanks located at the subject site. There are two 10,000 gallon single wall steel epoxy lined tanks with pressurized double wall fiberglass piping. Leak detection is performed on the tanks with an electronic monitoring system connected to an automatic in-tank gauge. Tightness testing is performed daily using the in-tank gauge at a confidence level of 97.5% and a leak threshold of 0.10 gallon/hour. The piping is monitored with automatic line leak detectors and turbine sump sensors.

The following conditions apply to the operation of the USTs in order to comply with Title 23 and the California Health & Safety Code:

- 1. Retain a copy of the permit and all conditions, including monitoring plans at the facility.
- 2. Written monitoring and maintenance records shall be maintained on-site or off-site at a readily available location and made available within 36 hours.
- 3. Leak detection to a threshold of 0.20 gallon/hour will be performed at least monthly after a product delivery or when the tank is filled to within 10% of the previous months highest level.
- 4. The interior of the tanks shall be inspected by a coatings expert or special inspector within 10 years of the lining (March 2001) and every five years thereafter. Written certification of the inspection shall be provided by the tank owner and the party performing the inspection to this office within 30 calendar days of completion of the inspection.
- The cathodic protection system shall be tested by a cathodic protection tester at least every three years.

Corwood Car Wash November 22, 1995 page 2

Impressed-current cathodic protection systems, like the system at your site, shall also be inspected no less than every 60 calendar days to ensure that they are in proper working order. Inspections shall be documented and kept as part of the operating records.

- 6. Continuous monitoring of the turbine sump with secondary containment of the pressurized piping shall be utilized employing audible and visual alarms.
- 7. The permittee must comply with Health and Safety Code chapters 6.7, 6.75 and with California Code of Regulations Title 23, Division 3, Chapter 16.
- 8. All fees associated with the permitting of the tanks shall be paid in a timely manner to this Department.

If you have any questions related to the operation of the tanks at this facility please contact me at (510) 567-6781.

Sincerely,

Robert Weston

Sr. Hazardous Materials Specialist

enclosure

c: Bill Raynolds, East Area Manager, ACDEH

DAVID J. KEARS, Agency Director

V R02432 (LOP)

RO2890 (LOP)

RAFAT A. SHAHID, Assistant Agency Director

StID 696

November 9, 1995

Mr. Roger Woodward P.O. Box 2688 Dublin, CA 94568 Alameda County Environmental Protection Division 1131 Harbor Bay Parkway, Room 250 Alameda CA 94502-6577 (510) 567-6700

SECOND NOTICE OF VIOLATION

Dear Mr. Woodward:

On August 5, 1994, the Alameda County Department of Environmental Health, Hazardous Materials Division, sent you a letter requesting that quarterly monitoring/sampling be reinstated for 6973 Village Parkway, Dublin. We have not received any reports since November 1993 which documented the installation and sampling of three groundwater monitoring wells in June 1993. Therefore, this letter constitutes a <u>Second Notice</u> that you are in violation of specific laws and that quarterly monitoring of onsite wells must be reinstated.

According to Section 25298 of the California Health and Safety Code, underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge. Therefore, you, as the responsible party are in violation of this section of the Code, for which Section 25299 specifies civil penalties of up to \$5,000, for each day of violation, upon conviction. Also, failure to furnish technical reports regarding documented or potential groundwater contamination violates Section 13267(b) of the California Water Code. The Regional Water Quality Control Board (RWQCB) can impose civil penalties of up to \$1,000 per day that such a violation continues.

At this time, you are required to reinstate quarterly monitoring at the referenced site within 30 days of the date of this letter, or by **December 11, 1995**. Quarterly monitoring reports are also due 60 days upon completion of field work.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

Donna Turcotte, SWRCB Christina Noma, P.O. Box 2047, Oakland, CA 94604-2047 files (corwood.12)

DAVID J. KEARS, Agency Director

R02890

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 696

August 5, 1994

Ms. Christine Noma Wendel, Rosen, Black & Dean P.O. Box 2047

Oakland, CA 94604-2047

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

VR02432

Quarterly Reports for Corwood Carwash, 6973 Village Pkwy, RE: Dublin 94568

Dear Ms. Noma:

I have reviewed your letter of August 1, 1994 requesting an extension to defer quarterly monitoring and additional subsurface investigations until Mr. Woodward receives funding from the State UST Cleanup Fund. This office does not concur that site investigation and quarterly monitoring should progress only if the State provides funding.

The only groundwater sampling event that we have been made aware of occurred in June 1993. To date, we are not in receipt of any subsequent quarterly reports.

As you are aware, Title 23 of the California Code of Regulations (23CCR), Section 2652(d), requires the owner or operator of an UST facility to submit reports every three months, or at a more frequent interval as specified by the local agency or regional water board, until investigation and cleanup are complete.

Therefore, this letter constitutes a Notice that Mr. Woodward is in violation of the above specific law and that the technical report is due. Unless your client can demonstrate he has absolutely no means to continue with the investigation, quarterly monitoring/sampling must be reinstated immediately for the above referenced site.

Please be advised, that failure to comply with regulatory agency time schedules and requirements could be grounds for withdrawal of the State Water Resources Control Board's Letter of Commitment for the cleanup fund.

Ms. Christine Noma re: 6973 Village Pkwy, Dublin August 5, 1994

If you have any questions, I can be reached at (510) 567-6700.

Sincerely,

eva chu

Hazardous Materials Specialist

cc: Roger Woodward, P.O.Box 2688, Dublin 94568

Donna Turcotte, SWRCB

Gil Jensen, Alameda County District Attorney's Office

files (corwood11)

V RO2432 RO2890 (STID 696)

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 696

May 6, 1994

Mr. Roger Woodward P.O. Box 2688 Dublin, CA 94568

DAVID J. KEARS, 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

Subject: Workplan Approval for Corwood Carwash, 6973 Village

Parkway, Dublin, CA 94568

Dear Mr. Woodward:

On February 18, 1994 I approved a workplan for the advancement of soil borings near monitoring well MW-3 to determine the extent of soil contamination at the above referenced site. This work was to have commenced by April 6, 1994. I had also requested that additional borings be advanced around the dispenser to determine if the product lines and dispensers had leaked in the past.

To date, I have not received an ammended site plan, nor has work begun for this phase of the investigation. In a recent conversation with Mr. Owen Kittredge, a proposal to do hand auger borings around the island (to ensure that utility lines, etc, would not be damaged) was approved. It is my understanding you will obtain two additional bids for the work required. This bid process should commence immediately, and field activities should begin no later than June 24, 1994.

Quarterly monitoring/sampling of the existing wells should also have been initiated with a sampling event in March 1994. This office is not in receipt of a quarterly monitoring report (QMR) summarizing results of this event. If this work was performed, a QMR is due within 15 days of the date of this letter.

Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.

Should you have any questions about the content of this letter, please contact me at (510) 271-4530.

eva chu

Hazardous Materials Specialist

CC: Owen Kittredge, 1050 Melody Ln, # 160, Roseville, CA 95678
Blessy Torres, SWRCB
files (corwood10)

√R02432 R02890

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 696

February 18, 1994

DAVID J. KEARS, Agency Director

Mr. Roger Woodward P.O. Box 2688 Dublin, CA 94568 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

Subject: Workplan Approval for Corwood Carwash, 6973 Village

Parkway, Dublin, CA 94568

Dear Mr. Woodward:

I have completed review of Aegis' February 8, 1994 Workplan for Subsurface Investigation for the above referenced site. The proposal to advance soil borings to determine the extent of soil contamination at the site is acceptable and field work should commence within 45 days of the date of this letter, or by April 6, 1994.

One or two additional soil borings should also be advanced around the former dispensing units to determine if the products lines and dispensers had leaked in the past. This area was never investigated when the underground storage tanks underwent an interior lining process in April 1991. Please send a site plan showing the proposed location of these additional borings.

Also, this office is not in receipt of any quarterly monitoring reports since the groundwater monitoring wells were installed. Sampling events should have occurred in September and December 1993. The next sampling event is due in March 1994. Technical summary reports documenting each well sampling and monitoring episode are also due quarterly. This schedule shall continue until further notice.

Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.

Should you have any questions about the content of this letter, please contact me at (510) 271-4530.

eva chu

Hazardous Materials Specialist

cc: Owen Kittredge, Aegis, 1050 Melody Lane, Suite 160 Roseville, CA 95678 files (corwood9)

R02890 (WP)

V RO 2432 (WP)

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DAVID J. KEARS, Agency Director

StID 696

February 8, 1994

Mr. Roger Woodward P.O.Box 2688 Dublin, CA 94568 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

SECOND NOTICE OF VIOLATION

Dear Mr. Woodward:

On November 10, 1993, the Alameda County Department of Environmental Health, Hazardous Materials Division, sent you a letter requesting a workplan detailing the work intended to delineate the extent of petroleum hydrocarbon contamination in soil as the result of the unauthorized release of fuel products at 6973 Village Parkway, Dublin, California. This workplan was due on or about December 27, 1993. An extension until January 31, 1994 for submittal of the workplan was requested by and granted to your consultants at Aegis Environmental. As of the date of this letter, however, we have not received the required workplan for the investigation. Therefore, this letter constitutes a Second Notice that you are in violation of specific laws and that the technical report is due.

According to Section 25298 of the California Health and Safety Code, underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge. Therefore, you, as the responsible party are in violation of this section of the Code, for which Section 25299 specifies civil penalties of up to \$5,000, for each day of violation, upon conviction. Also, failure to furnish technical reports regarding documented or potential groundwater contamination violates Section 13267(b) of the California Water Code. The Regional Water Quality Control Board (RWQCB) can impose civil penalties of up to \$1,000 per day that such a violation continues.

You are required to submit the technical reports for the site to this office within 15 days from the date of this letter. Failure to respond may result in referral of this case to the RWQCB or Alameda County District Attorney to consider for enforcement action. Modification of required tasks or extensions of stated deadlines must be confirmed in writing by either this agency or the RWQCB. Also, failure to comply with regulatory agency time schedules and requirements could be grounds for withdrawl of the State Water Resources Control Board's Letter of Commitment for the cleanup fund.

Mr. Roger Woodward

re: 2nd NOV February 8, 1994

If you have any questions, I can be reached at (510) 271-4530.

Sincerely,

eva chu

Hazardous Materials Specialist

cc: Owen Kittredge, Aegis, 1050 Melody Lane, Suite 160,

Roseville, CA 95678 Blessy Torres, SWRCB

Christine Noma, P.O. Box 3047, Oakland 94612

files

corwood8

V R02432

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 696

November 10, 1993

DAVID J. KEARS, Agency Director

Mr. Roger Woodward P.O.Box 2688 Dublin, CA 94568 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

Subject: Additional Investigation to Delineate Extent of Soil Contamination at 6973 Village Pkwy, Dublin 94568

Dear Mr. Woodward:

I have completed review of Aegis' November 1993 Results Report for Site Assessment for the above referenced site. This report documents the installation of three monitorings wells to assess petroleum hydrocarbon contamination in soil and groundwater. Analyses of the soil sample collected at 5.5' depth from boring MW-3 reveal 1,100 ppm TPH-D, 170 ppm TPH-G and 1,000 ppb benzene.

At this time further investigations are required to delineate the extent of petroleum hydrocarbon contamination in soil as a result of the fuel release at this site. A workplan detailing work intended for this investigation is due within 45 days of the date of this letter.

Also, a quarterly groundwater sampling/monitoring schedule should be established for this site. Groundwater should be analyzed for TPH-G, TPH-D, BTEX, and total lead. Technical summary reports documenting each well sampling and monitoring episode are also due quarterly. This schedule shall continue until further notice.

Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency.

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

eva chu

Hazardous Materials Specialist

cc: Paul Graff, 1050 Melody Ln., Suite 160, Roseville, 95678
Blessy Torres, SWRCB
Christine Noma, P.O.Box 2047, Oakland, CA 94612
files (corwood7)

•

R02890

R02890

VR02432

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

•

StID 696

October 6, 1993

Mr. Roger Woodward P.O.Box 2688 Dublin, CA 94568

DAVID J. KEARS, 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

Subject: Monitoring Well Installation Report for Corwood Car Wash, 6973 Village Parkway, Dublin 94568

Dear Mr. Woodward:

On June 8, 1993 I was present at the above referenced site to observe the installation of three groundwater monitoring well. To date, this office is not in receipt of a technical report documenting the results of the investigation.

Title 23 of the California Code of Regulations (23CCR), Section 2652(d), requires the owner or operator of an UST facility to submit reports every three months, or at a more frequent interval as specified by the local agency or regional water board, until investigation and cleanup are complete. In addition, the California Health and Safety Code (CHSC), Section 25298, states that underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge.

Please submit the referenced report within 15 days of the date of this letter. Be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency.

Should you have any questions about the content of this letter, please contact me at (510) 271-4530.

eva chu

Hazardous Materials Specialist

RO2890 RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DAVID J. KEARS, Agency Director

StID 696

February 22, 1994

Christine Noma Wendel, Rosen, Black, Dean & Levitan P.O.Box 2047 Oakland, CA 94612

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

VR02432

Subject: Well Installation Activity for Corwood Car Wash,

6973 Village Pkwy, Dublin 94568

Dear Ms. Noma:

I have reviewed the file for the above referenced site and your letter of February 8, 1993 requesting consideration to delay groundwater monitoring well installation until June 1, 1993. This office will grant an extension for the well installation provided you submit a signed contract with a time schedule for field activities commencing no later than June 1, 1993. contract is due within 30 days of the date of this letter. in mind that Mr. Woodward was requested to initiate soil and groundwater investigation in a letter dated June 29, 1992. Extensions of deadlines to submit workplans have been granted numerous times. I understand Woodward Industries intends to proceed with due diligence towards assessing the extent and severity of contamination at the referenced site and this office will work with Woodward Industries to accomplish this task.

If you have any questions regarding this matter, please contact me at (510) 271-4530.

Sincerely

Eva Chu

Hazardous Materials Specialist

Rich Hiett, RWQCB cc:

> Gil Jensen, Alameda County District Attorney's Office Roger Woodward, P.O.Box 2688, Dublin, CA 94568

Douglas Sheeks, Aegis Environmental, 1050 Melody Lane,

Suite 160, Roseville, CA 95678

Edgar Howell/files

rR02890 √R02432

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 696

November 30, 1992

DAVID J. KEARS, Agency Director

Douglas Sheeks Aegis Environmental 1050 Melody Lane, Suite 160 Roseville, CA 95678 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

Subject: Addendum to Workplan for Installation of Groundwater Monitoring Wells at Corwood Car Wash, 6973 Village Pkwy,

Dublin

Dear Mr. Sheeks:

I have reviewed the Addendum to Aegis Workplan, dated November 23, 1992, for the installation of three monitoring wells at the above referenced site. The workplan is approved by this Agency. Field work should commence within 45 days of the date of this letter. 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 <u>quarterly</u> until this site qualifies for RWQCB "sign off." All reports and proposals must be submitted under seal of a California Registered Geologist, Certified Engineering Geologist, or Registered Civil Engineer.

Please notify this office 48 hours prior to the start of field work. If you have any questions or comments about the content of this letter, please contact me at (510) 271-4530.

Sincerely,

Eva Chu

Hazardous Materials Specialist

cc: Roger Woodward, P.O. Box 2688, Dublin, CA 94568

Rich Hiett, RWQCB Edgar Howell/files

corwood4

R02890 V R02432

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DAVID J. KEARS, Agency Director StID 696

November 5, 1992

Douglas Sheeks Aegis Environmental 1050 Melody Lane, Suite 160 Roseville, CA 95678 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

Subject: Workplan for Installation of Groundwater Monitoring Wells at Corwood Car Wash, 6973 Village Pkwy, Dublin

Dear Mr. Sheeks:

I have reviewed the proposal dated October 28, 1992 for the installation of three monitoring wells at the above referenced site. The workplan is approved with the following changes and concerns:

- Soil and ground water samples should be analyzed for TPH-G, TPH-D, BTEX, and lead.
- 2. Ground water sampling should be performed at least 24 hours after well development.
- 3. Wells should be surveyed to an established benchmark to an accuracy of 0.01 foot.
- 4. Per Wyman Hong, Zone 7, seasonal high ground water has been at 7.5' below ground surface. The perforated screen length of the wells should accommodate seasonal ground water fluctuations.
- 5. Ground water should be monitored on a monthly basis for one quarter, and on a quarterly basis thereafter until further notice.

Please be advised that the workplan is a preliminary assessment of the extent of petroleum hydrocarbon contamination to soil and ground water. After water gradient is verified, one downgradient monitoring well is required within 10' of the tank cluster. Additional soil borings and/or monitoring wells may be required to further delineate the extent of soil and ground water contamination.

Field work should commence within 45 days of the date of this letter. 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 <u>quarterly</u> until this site qualifies for RWQCB "sign off." All reports and proposals must be submitted under seal of a California Registered Geologist, Certified Engineering Geologist, or Registered Civil Engineer.

Doug Sheeks Workplan for Corwood Carwash 6973 Village Pkwy, Dublin November 5, 1992

Please notify this office 48 hours prior to the start of field work. If you have any questions or comments about the content of this letter, please contact me at (510) 271-4530.

Sincerely,

lister

Eva Chu.

Hazardous Materials Specialist

CC: Roger Woodward, P.O. Box 2688, Dublin, CA 94568

Rich Hiett, RWQCB Edgar Howell/files

corwood3

R02890 V R02432

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division

80 Swan Way, Rm. 200 Oakland, CA 94621 (510) 271-4320

July 6, 1992

StID 696

Roger Woodward P.O. Box 2688 Dublin, CA 94568

Subject: Unauthorized Report Form

ے. Corwood Carwash

6973 Village Pkwy, Dublin .

Dear Mr. Woodward:

Per our conversation on July 6, 1992, you indicated that an <u>Unauthorized Release Report</u> form was not included in the letter sent to you and dated June 29, 1992. I am enclosing the referenced form and extending the deadline for returning this form to 10 days of the date of this letter.

As per your request, we will meet at our office on Thursday, July 9, 1992 at 11:00 A.M. If there are any changes, please notify me as soon as possible at (510) 271-4530.

Sincerely

Eva Chu

Hazardous Material Specialist

corwood2

HEALTH CARE SERVICES

AGENCY

√R02432 **¢** R02890

DAVID J. KEARS, Agency Director RAFAT A. SHAHID, Assistant Agency Director

StID 696

June 29, 1992

Roger Woodward P.O. Box 2688 Dublin, CA 94568 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Division 80 Swan Way, Rm. 200 Oakland, CA 94621 (510) 271-4320

Subject: Preliminary Site Assessment for Corwood Carwash,

6973 Village Pkwy, Dublin 94568

Dear Mr. Woodward:

This office has reviewed the file for the above referenced site. In April 1990, Gold Coast Technologies, Inc., was retained to provide interior linings and cathodic protection for two 10,000 gallon fuel underground storage tanks (USTs). Additionally, a subsurface investigation was also undertaken during the cathodic protection anode placement.

The noted subsurface investigation was accomplished by advancing four boreholes around the tank cluster. Groundwater was encountered at 15' depth. Soil borings indicated up to 800 parts per million (ppm) of total petroleum hydrocarbons as gasoline (TPH-G) at 5' depth, and 530ppm TPH-G and 65ppm TPH as diesel at 10' depth. Groundwater grab samples indicate up to 3,000 parts per billion (ppb) TPH-G and 1,200 ppb benzene. Permanent monitoring wells were not constructed.

The results of the laboratory analyses confirmed soil and groundwater contamination due to an unauthorized release of petroleum products. As a result, you are required to complete the enclosed <u>Unauthorized Release Report</u>. This report must be filled out and submitted to this office within 10 days of the date of this letter.

As a result of the unauthorized release at this site, further environmental investigation is required. This investigation shall be in the form of a Preliminary Site Assessment (PSA). In order to initiate this work, you must submit a PSA work plan detailing work intended to determine the lateral and vertical extent, and severity, of soil and groundwater contamination at this site. The PSA must be conducted in accordance with the Regional Water Quality Control Board (RWQCB) Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, the State Water Resources Control Board LUFT Manual, and Article 11 of Title 23, California Code of Regulations (CCR). The major elements of such an investigation are summarized in the attached Appendix A.

Roger Woodward 6973 Village Pkwy., Dublin June 29, 1992 Page 2

The PSA proposal is due within 45 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 guarterly until this site qualifies for final RWQCB "sign off."

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

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

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.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Failure to respond will result in referral of this case to the RWQCB or Alameda County District Attorney to consider for enforcement action. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Copies of all reports and proposals should also be sent to Eddy So of the RWQCB.

Should you have any questions about the content of this letter, please contact Ms. Eva Chu at (510) 271-4530.

Sincerely,

scott O. Seery, CHMM

Senior Hazardous Materials Speciali

enclosures

cc: Eddy So, RWQCB

Mark Thomson, Alameda County District Attorney's Office

Tom Hathcox, Dougherty Regional Fire Department

files

corwood

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

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH (4)
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

May 28, 1992

Mr. Godfrey G. Becks Malicoat, Becks and Associates, Inc. P.O. Box 348 Martinez, CA 94553

RE: PROPERTY LOCATED AT 7000 VILLAGE PARKWAY, DUBLIN.

Dear Mr. Becks:

Pursuant to your request for information regarding the above site in Dublin, the following is a summary of our findings.

RO2432
1. 6973 Village Parkway, UNOCAL gas station; In May of 1991 soil and groundwater sampling was carried out as part of an interior tank lining procedure. Petroleum hydrocarbon contamination was detected in both soil and groundwater (800ppm as TPH-D, 500ppm as TPH-G in soil and 3000ppb as TPH-G in groundwater). Groundwater monitoring results have not being submitted to this office since the May 1991 sampling event.

R0380 2.7375 Amador Valley Blvd., UNOCAL service station; No additional work has been carried out at this site.

3. 7194 Village Parkway, Oil Changers; No additional work has been Ro259 carried out at this site.

All three of these cases have been transferred to the Local Oversight Program for further actions.

Please find enclosed a copy of the invoice sent to our billing unit.

If you have any questions concerning this matter, please call me at (510) 271-4320.

Sincerely,

Ravi Arulanantham

Hazardous Materials Specialist

Attachment c: files

23000