

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



sent  
04-13-05

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

April 12, 2005

Thomas H. Kosel, Site Manager, Risk Management and Remediation  
ConocoPhillips  
76 Broadway  
Sacramento, CA 95818

Dear Mr. Kosel,

Subject: Fuel Leak Case No. RO0002444, Unocal Service Station No. 7124,  
10151 International Boulevard, Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed "Work Plan for Workplan for Additional Off-Site Monitoring Well Installation" dated October 14, 2004, prepared by SECOR International Incorporated. We disapprove the Work Plan. We request that you address the following technical comments and send us the technical reports requested below.

#### TECHNICAL COMMENTS

- 1) Groundwater Monitoring Wells - We do not agree with the proposed monitoring wells. We feel that it would be premature to install more monitoring wells without additional groundwater sampling to determine the location of the plume for optimal well locations. Please submit a Work Plan for groundwater sampling, which will determine the optimal locations for additional monitoring wells.
- 2) Preferential Pathway Survey - We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site.
  - a) Utility Survey - Please submit map(s) and cross-sections showing the location and depth of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s). Evaluate the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers. Please submit with the Work Plan requested below.

- b) Well Survey – Locate wells within a quarter mile radius of the site. Show the location of the wells and the site on a map and tabulate well construction details for each well. Please submit with the Work Plan requested below.
- 3) Proposed Monitoring Well Screen Length - The monitoring well screen lengths proposed are 15 feet. We request that your monitoring network be depth discrete, generally, screened intervals of 3 to 5 feet in length.
- 4) Proposed Soil Samples from Borings – Sample at changes of lithology, at the soil/groundwater interface, and at areas of obvious contamination, at a minimum of 5 ft. intervals.
- 5) MW-2 – Has been paved over since April 26, 2004. This groundwater monitoring well may need to be put back in service or replaced.

#### OTHER COMMENTS

- 6) Landowner Notification Requirement - Pursuant to California Health & Safety Code Section 25297.15, the active or primary responsible party for a fuel leak case must inform all current property owners of the site of cleanup actions or requests for closure. Furthermore, ACEH may not consider any cleanup proposals or requests for case closure without assurance that this notification requirement has been met. Additionally, the active or primary responsible party is required to forward to ACEH a complete mailing list of all record fee titleholders to the site.

At this time we require that you submit an updated mailing list of all record fee title owners of the site, which states, at a minimum, the following:

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

- OR -

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

*(Note: Complete item A if there are multiple site landowners. If you are the sole site landowner, skip item A and complete item B.)*

In the future, for you to meet these requirements when submitting cleanup proposals or requests for case closure, ACEH requires that you:

1. Notify all current record owners of fee title to the site of any cleanup proposals or requests for case closure;
2. Submit a letter to ACEH which certifies that the notification requirement in 25297.15(a) of the Health and Safety Code has been met;
3. Forward to ACEH a copy of your complete mailing list of all record fee title holders to the site; and
4. Update your mailing list of all record fee titleholders, and repeat the process outlined above prior to submittal of any additional *Corrective Action Plan* or your *Request for Case Closure*.

Your written certification to ACEH (Item 2 above) must state, at a minimum, the following:

*A. In accordance with Section 25297.15(a) of the Health & Safety Code, I, (name of primary responsible party), certify that I have notified all responsible landowners of the enclosed proposed action. (Check space for applicable proposed action(s)):*

*cleanup proposal (Corrective Action Plan)*

*request for case closure*

*local agency intention to make a determination that no further action is required*

*local agency intention to issue a closure letter*

- OR -

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

*(Note: Complete item A if there are multiple site landowners. If you are the sole site landowner, skip item A and complete item B.)*

#### TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Don Hwang), according to the following schedule:

June 12, 2005 - Work Plan

#### OTHER REPORT REQUEST

June 12, 2005 - List of Record Fee Title Owners

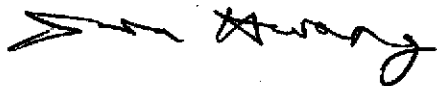
These reports are being requested pursuant to California Health and Safety Code

Mr. Kosel  
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Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

If you have any questions, I may be reached at (510) 567-6746.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hwang", written in a cursive style.

Don Hwang  
Hazardous Materials Specialist  
Local Oversight Program

C: M. Gavan Heinrich, SECOR International Incorporated, 3017 Kilgore Rd., Suite 100,  
Rancho Cordova, CA 95670  
Donna Drogos  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



01-31-02

RO0002444

January 30, 2002

Mr. Dave DeWitt  
Tosco  
2000 Crow Canyon Pl Suite 400  
San Ramon, CA 94583

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
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RE: Work Plan Approval for Tosco Station 7124 at 10151 E 14<sup>th</sup> St, Oakland, CA

Dear Mr. DeWitt:

I have completed review of Secor's January 2002 *Work Plan for Monitoring Well Installation* prepared for the above referenced site. The proposal to install four groundwater monitoring wells at the site is acceptable. Be advised that wells must be surveyed to determine latitude and longitude coordinates and be within sub-meter accuracy. In addition, the well casing elevation must also be calculated.

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

eva chu  
Hazardous Materials Specialist

c: Daniel Vargas  
Secor  
2301 Leghorn Street  
Mountain View, CA 94043

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R02444

RAFAT A. SHAHID, Assistant Agency Director

September 2, 1993  
STID # 3913

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

Mr. Syed Rizvi  
Environmental Compliance Officer, Unocal  
Unocal Corporation  
911 Wilshire Blvd., Floor 11  
Los Angeles, California

Re: FIVE YEAR UNDERGROUND TANK PERMIT FOR UNOCAL # 7124 LOCATED  
AT 10151 EAST 14TH STREET, OAKLAND, CA. 94603

Dear Mr. Rizvi;

Please find enclosed a five-year operating permit certificate, for three fiberglass underground storage tanks at the site noted above. This permit is being issued, contingent upon the facility's compliance with all applicable underground tank monitoring requirements. Acceptable monitoring procedures are described in the revised Title 23, California Code of Regulations (C.C.R.) which became effective August 9, 1991. In order to maintain a valid permit, any deficiencies noted on the final underground tank inspection report or subsequent inspections, must be corrected. Below is a summary of the monitoring requirements for your facility:

**1. Sections 2645 and 2646 - Inventory Reconciliation**

- a) Record the daily variation in inventory reconciliation. This is the difference between the measured inventory in the tank and the calculated inventory. The calculated inventory shall be determined by adding the fuel inputs from deliveries and subtracting the day's sales withdraws from the physically measured inventory of the day before.

Meters or gauges used to measure the in tank inventory must be approved by this office. Commercial gauges and measuring devices should meet the standards in Title 4, Chapter 9, of the California Code of Regulations (C.C.R.) and be inspected by the County Department of Weights and Measures.

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Weekly tank gauging shall only be used as part of a monitoring program for existing tanks which have a total system capacity of 2,000 gallons or less and which can be taken out of service for at least 48 continuous hours each week. Tanks with a capacity of 550 gallons or less may be exempt from integrity testing each year.

You are advised that after January 1, 1993, using manual stick readings to measure the physical inventory, may require your inventory reconciliation data to be evaluated by a third party certified statistical analyst. This rule applies where the highest anticipated ground water may come to less than 20 feet below the bottom of the tank.

Daily variations shall be summed for a period of one month. If monthly variations exceed 1% per cent of the monthly tank delivery plus 130 gallons, this office must be notified. An investigation as to the cause of excess variations must be conducted and reported to this office.

- b) Submit an annual statement to this office which states that all inventory reconciliation data are within allowable limits or list the times and corresponding variations when allowable limits were exceeded. This statement shall be executed under penalty of perjury.

## 2. Section 2643 - Non-visual Monitoring

- a) Monitoring of piping shall be conducted at least hourly, which is capable of alerting the operator when 3 gallons have leaked or a leak rate of three gallons per hour at 10 p.s.i. exists; and

Annual piping system integrity testing shall be conducted which is capable of detecting a minimum release of 0.1 gallon per hour at 1.5 (one and a one/half times) normal operating pressure.

- b) Annual tank integrity testing shall be conducted which is capable of detecting a release of 0.1 gallon per hour at or above the maximum product level of the tank.

## 3. Section 2663 - Overfill Prevention

- a) Onsite personnel or the operator's agent must ensure that the volume available in the tank is greater than the volume of product or waste oil to be transferred

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into the tank before the transfer is made. Also the transfer process must be watched to prevent overfilling and spilling.

#### **4. Section 2643 et. seq., Non- Visual Monitoring**

- a) Maintain the monitoring equipment in good repair and service in accordance with the manufacturer's instructions. In a written plan, describe the training needed for the operation of both the tank system and monitoring equipment or conducting monitoring procedures. Maintain the plan on site for review.

#### **5. Section 2712 - Permit Conditions**

- a) Retain all monitoring and maintenance records on-site or at a readily available location off-site, if approved by this agency, for a period of at least 3 years. These records must be made available, upon request within 36 hours, to the local agency or the Regional Water Quality Control Board.

During the inspection performed May 28, 1993, two of the three tanks, on site contained 87 octane fuel. These tanks are connected by manifold to the same piping. You should be aware the above Inventory reconciliation method has not been approved for manifolded tank systems. Therefore your leak detection program will be acceptable with the change to monthly tank integrity testing, per your monitoring proposal, dated August 27, 1993. Please submit two replacement Underground tank application forms "B", for the change of information.

The above listed requirements reflect the information currently on file and may not include deficiencies disclosed during routine inspections or changes that will result from tank and piping upgrading required by December 22, 1998. You may utilize other release detection methods for tanks and pipelines as outlined in the revised Title 23, C.C.R.. Please send a letter to this office notifying us of any changes in the monitoring methods.

Consult the revised Title 23, C.C.R. regarding any additional requirements. To obtain a copy of the regulations, you may contact the State Water Resources Control Board at (916)323-1262.



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Should you have any questions or concerns regarding the contents of this letter, please call me at (510)271-4320.

Sincerely,

  
Kevin Tinsley  
Hazardous Materials Specialist

cc: Edgar Howell, Chief (kt-files), AlCo. E.H.D.  
Ron Owcarz, Haz. Mat. Specialist, AlCo. E.H.D.  
Ton Huynh, Unocal Dealer