

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R02770

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

June 10, 1998

ATTN: Accounts Payable

Willow Park Golf Course
17007 Redwood Rd
Castro Valley CA 94546

RE: Project # 963A - Type M
at 17007 Redwood Rd in Castro Valley 94546

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$370.50, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested or any unused monies will be refunded to you or your designee.

The deposit refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$94 per hour.


Please be sure to write the following identifying information on your check:

- project #
- type of project and
- site address

(see RE: line above).

If you have any questions, please contact Amir Gholami at (510) 567-6876.

Sincerely,


Tom Peacock, Manager
Environmental Protection

c: files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO2770

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

May 13, 1998

ATTN: Sir Or Madam

Hageman Schank Inc
2723 Crow Canyon Rd #210
San Ramon CA 94583

RE: Project # 963A - Type M
at 17007 Redwood Rd in Castro Valley 94546

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$370.50, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested or any unused monies will be refunded to you or your designee.

The deposit refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$94 per hour.

Please be sure to write the following identifying information on your check:

- project #
- type of project and
- site address

(see RE: line above).

If you have any questions, please contact Amir Gholami at (510) 567-6876.

Sincerely,

Tom Peacock, Manager
Environmental Protection

c: files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02770

RAFAT A. SHAHID, Assistant Agency Director

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

June 29, 1992

Mr. Lester Feldman
Regional Water Quality Control Board
San Francisco Bay Region
2101 Webster Street, 4th. Floor
Oakland, CA. 94612

Dear Lester:

As we agreed on Friday Alameda County Environmental Health Department, Hazardous Materials Division will discontinue the lead on the underground tank remediation at 17007 Redwood Road, Castro Valley. We appreciate your cooperation in this removal and subsequent actions taken to date.

By copy of this letter we are notifying Mr. R. S. Viviani that the Regional Water Quality Control Board is now the lead and all correspondence should be made to you or Richard Hiatt.

If we can be of any assistance to you please let us know.

Sincerely:

Edgar B. Howell III, Chief
Hazardous Materials Division

cc Rafat A. Shahid, Ass't Agency Dir.
Richard Hiatt RWQCB
Scott Seery, Sen. Haz. Mat. Spec.
Bernard F. Rose, esq
R. S. Viviani, Willow Park
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



FO2770

RAFAT A. SHAHID, Assistant Agency Director

June 3, 1992

Mr. Richard Hiatt
Regional Water Quality Control Board
San Francisco Bay Region
2101 Webster Street, 4th Floor
Oakland, CA 94612

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

RE: WILLOW PARK GOLF COURSE, 17007 REDWOOD ROAD, CASTRO VALLEY

Dear Mr. Hiatt:

As a means to provide background to the discussions to follow, please find enclosed copies of the following documents:

- o January 21, 1991 correspondence from Mr. Rene S. Viviani, Superintendent of Willow Park Golf Course
- o January 24/25, 1991 internal ACDEH memo to Willow Park Golf Course file
- o February 22, 1991 correspondence from Mr. Bernard F. Rose, Esq., of Randick & O'Dea, the law firm representing Willow Park Golf Course
- o October 10, 1991 correspondence from Mr. Gary Aguiar of Hageman-Aguiar, Inc., the environmental consulting firm conducting the investigation at Willow Park Golf Course
- o May 18, 1991 correspondence from Mr. Bernard F. Rose, Esq., of Randick & O'Dea

On August 28, 1990, a single 1000 gallon underground storage tank (UST) was closed at the referenced site. The UST was located within an apparent cut slope along the eastern margin of the course's 18th hole fairway. The former UST site is within the watershed of San Leandro Creek and very approximately 2500 feet east of Lake Chabot. The property is owned by the East Bay Municipal Utilities District (EBMUD). However, the golf course facility is owned and operated by Mr. Rene Viviani.

The subject tank had been used for the storage of unleaded gasoline. Observations of the tank and its excavation following closure indicate a strong likelihood of historical overfilling of the tank, as evidenced by the dissolved tar coating at the fill end of the UST and stained material at the base of the excavation. Fuel vapors were also noted coming from the tank pit.

Mr. Richard Hiett
RE: Willow Park Golf Course, 17007 Redwood Rd.
June 3, 1992
Page 2 of 5

Soil samples were difficult to collect because of shallow fractured bedrock within approximately 6-10 inches below the tank. That sample collected from below the fill end of the UST (TX1-S2) was most difficult to collect, as a brass sampling tube could not be driven into native material. After some discussion between myself and the geologist collecting samples that day, Mr. David Glick of David C. Glick and Associates, we decided that all that could be done was to collect bedrock fragments and "soil" to the degree possible, much of which was forced into the sampling tube by hand.

Analyses of sample TX1-S2, collected from the fill end of the tank, identified the presence of detectable concentrations (35 ppm) of total petroleum hydrocarbons as gasoline (TPH-G), in spite of the manner in which the sample was collected. Minor concentrations of ethylbenzene and total xylenes were also found. Following the RWQCB requirement that further investigation be pursued whenever detectable concentrations of contaminants are discovered in highly permeable material (e.g., fractured bedrock), this agency requested the submittal of a preliminary site assessment (PSA) work plan from the owner of the facility in December 1990.

The request for a PSA work plan was met with staunch opposition by the facility owner (See: Jan. 21, 1991 correspondence). As a result, a meeting was held February 20, 1991 in the offices of the San Francisco Bay Regional Water Quality Control Board (RWQCB) to discuss the nature and extent of future environmental investigations at the referenced site. Present were representatives of Willow Park Golf Course (including council), East Bay Regional Park District, EBMUD, RWQCB and this author. The enclosed February 22, 1991 correspondence from Mr. Bernard F. Rose, council to Willow Park Golf Course, summarizes Mr. Rose's recollection of the agreements reached during the cited meeting.

A PSA work plan, dated April 12, 1991, was submitted by Hageman-Aguilar, Inc. (HAI). The noted work plan was approved by this office on April 25, 1991 with some conditions. Such approval was based on the technical merit of the submitted work plan, telephone conversations I shared with with Mr. Gary Aguiar of HAI regarding well placement strategies, and discussions at the February 20 meeting which, in part, also involved such well placement strategies.

According to a June 21, 1991 HAI report documenting the results of the PSA, one ground water monitoring well, designated MW-1, was installed on May 16, 1991. The well was developed May 20, and then purged and initially sampled on May 22, 1991. Ground water was initially reached at a depth of approximately 13-feet below grade (BG), stabilizing at approximately 8-feet BG. Soil and ground water samples were analyzed for gasoline compounds. All samples analyzed were found to be below laboratory detection limits, or "nondetectable" (ND).

Mr. Richard Hiatt
RE: Willow Park Golf Course, 17007 Redwood Rd.
June 3, 1992
Page 3 of 5

Figure 3 of the cited report indicates that this well is located approximately 200-feet in a direction west-by-southwest from the subject UST. From my conversations with HAI's Mr. Aguiar, well MW-1 is not installed where originally planned. The well location was extended further west from the UST at the direction of Mr. Rene S. Viviani, Superintendent of Willow Park Golf Course. Such modification to the original work plan was without consultation with or approval from this office.

A subsequent HAI report issued September 26, 1991 presents the results of ground water sampling from MW-1 occurring August 21, 1991. Samples were analyzed for gasoline compounds, and again found to be ND. As a result of these findings, HAI informed this office in correspondence dated October 10, 1991 (enclosed) that well MW-1 would be destroyed in accordance with decisions made during the February 20, 1991 meeting.

Following review of the June 21 and September 26, 1991 HAI reports, I spoke at some length with Mr. Lester Feldman of the RWQCB. Mr. Feldman was present at the February 20, 1991 meeting during which a compromise was reached with regard to the scope of the requisite environmental investigation. I conveyed a concern that, because well MW-1 was installed approximately 200-feet from the UST site, relevant data could not be generated, particularly when the precise downgradient direction from the tank was unknown. Further, the eventual location of the well was not based upon a depth-to-bedrock projection, as agreed to during the February 20 meeting, but rather at the insistence of Rene S. Viviani that the well be placed in an area more convenient to course activities*. Mr. Feldman and I discussed means by which this case could eventually be closed, including the advancement of additional borings in very close proximity to the former UST pit and analysis of soil samples with ND results.

*Please note that during the February 20 meeting, Mr. Viviani expressed that he preferred the well not be advanced so close to the tank as to encounter bedrock before reaching ground water. He wanted to be sure that ground water was reached in the first boring advanced as to minimize costs for the project. It was agreed that effort would be expended in studying electric and gamma-ray logs generated by EBMUD during an irrigation feasibility study conducted by EBMUD for the golf course in July 1989, among other relevant data. As Mr. Rose states in his February 22 letter, the goal was to place the well "...where it's installation will be the least impeded by the bedrock formations underlying the area." However, what Mr. Rose fails to state is that the well must also be placed as proximal to the UST site as possible for relevant data to be generated. The purpose of a well is to determine whether there has been an impact to ground water - the further away from the UST the well is, the more questions could be raised regarding it's location and capacity to intercept contaminants originating from the tank site, particularly when ground water flow directions have never been determined absolutely.

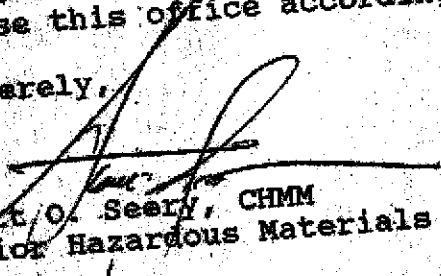
Mr. Richard Hiatt
 RE: Willow Park Golf Course, 17007 Redwood Rd.
 June 3, 1992
 Page 5 of 5

The eventual well location was directed by Mr. Viviani based not where it would produce relevant data, but rather where it would least impact course activities. Based on the initial depth to ground water of 13-feet BG, it appears unlikely that bedrock would have been encountered if MW-1 had been installed closer to the UST site.

- 3) Hence, well MW-1 is too remote to and in a location not proven to be downgradient of the former UST site. It is unlikely that well MW-1 will allow the collection of relevant and reliable data for the purpose of establishing whether or not a release from the subject UST has impacted ground water beneath the site. As a result of these facts, no purpose would be served by continued sampling of this well.

By way of this letter, this office is referring this case to the RWQCB for review and consideration of Willow Park's proposal. Please advise this office accordingly. I may be contacted at 510/271-4320.

Sincerely,


 Scott O. Seery, CHMM
 Senior Hazardous Materials Specialist

enclosures

cc: w/o enclosures
 Rafat A. Shahid, Assistant Agency Director, Environmental Health
 Gil Jensen, Alameda County District Attorney's Office
 Howard Hatayama, DTSC
 Bob Bohman, Castro Valley Fire Department
 Steve Abhors, EBMUD
 Jerry Kent, EBRPD
 Bernard F. Rose, Randick & O'Dea
 files

Mr. Richard Hiatt
RE: Willow Park Golf Course, 17007 Redwood Rd.
June 3, 1992
Page 4 of 5

A subsequent letter (enclosed) dated May 18, 1992 authored by Mr. Bernard F. Rose of the law firm Randick & O'Dea, council to Willow Park Golf Course, presents Mr. Rose's account of events surrounding the removal of the subject UST and subsequent investigation. Unfortunately, this letter includes a number of factual errors, illustrating Mr. Rose's apparent limited understanding of the events occurring at the time of UST closure, the type of release this site is suspected to have experienced, the technical requirements of a site investigation, and the merit and relevance of data generated as a result of work performed to date.

The cited letter also indicates that "...Willow Park is not prepared to do any more investigative work entailing further invasion of the site." The letter further states "...in the utmost spirit of cooperation and good faith, in spite of the fact that there is absolutely no valid justification for the effort," Willow Park is willing to sample the well for one or two more quarters. Willow Park shall choose to do this only if the well may be destroyed and the site closed should the results of the analyses be ND.

This office does not concur with Willow Park's proposal for the following reasons:

- 1) The UST site is located on the eastern-most margin of a segment of a narrow valley comprising this portion of the San Leandro Creek watershed, east of Lake Chabot and west of Redwood Road. San Leandro Creek cuts through Cretaceous marine deposits of the San Leandro Hills, forming this relatively steep-sided valley. Ground water flow directions are assumed to be towards the creek, approximately 500-600 feet away. However, in the region of the valley most proximal to the UST site, the present creek bed makes a large bend from its course to the northwest, to a course towards the north. The presence of subsurface preferential pathways is unknown.

Well MW-1 is located approximately 200-feet west-by-southwest of the former UST site. Given the hydrologic environment, it is difficult to substantiate whether the well is downgradient of the UST site.

- 2) Well MW-1 was to have been placed as close to the former UST site as possible, but not so close as to be impeded by bedrock during boring advancement. Depth to bedrock was to be determined through study of electric and gamma-ray logs from a previous boring elsewhere on-site. Subsurface bedrock projections below the valley floor, based upon the angle of repose of the hillside to the east of the UST site, could then be used to collaborate log data, and determine a suitable drilling site.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02770

April 25, 1991

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

Mr. Gary Aguiar
Hageman-Aguiar, Inc.
3732 Mt. Diablo Boulevard, Ste. 372
Lafayette, CA 94549

RE: WILLOW PARK GOLF COURSE, 17007 REDWOOD ROAD, CASTRO VALLEY;
PRELIMINARY SITE ASSESSMENT PROPOSAL

Dear Mr. Aguiar:

Thank you for your recent submittal of the April 12, 1991 Hageman-Aguiar, Inc. work plan proposal entitled, Proposal for Subsurface Investigation, Willow Park Golf Course, 17007 Redwood Road, Castro Valley, CA, and the project oversight deposit totalling \$432.00.

The noted work plan, outlining proposed actions to assess the extent of potential subsurface contamination in the area perceived as downgradient of the former site of an underground storage tank, has been approved for implementation with the following conditions:

- 1) Please be certain that a minimum period of 24 hours passes between well development and sampling to allow time for the well to properly stabilize and to reduce the potential loss of volatiles compounds. Allowing a period of 72 hours to pass is preferable;
- 2) A sampling quality assurance/quality control (QA/QC) plan must be in effect. Please reference Appendix D (pgs. A30-A35) of the State Water Resources Control Board LUFT Field Manual, as revised October 1989, for the required elements. It is recommended that the QA/QC sampling protocol include such elements as duplicate samples, and trip and equipment blanks. The analyses results of QA/QC samples are to appear on the laboratory report sheets;
- 3) The completed well must be surveyed to an established benchmark to the accuracy of 0.01 foot, relative to MSL. All subsequent water level measurements are to be referenced to MSL;
- 4) Please be certain that the Site Safety Plan adheres to guidelines specified under Part 1910.120(i)(2) of 29CFR.

Mr. Gary Aguiar
RE: Willow Park Golf Course, 17007 Redwood Road
April 25, 1991
Page 2 of 2

This Department will expect to receive a report documenting the results of the initial field and sampling activities within 45 days of the completion of these activities. This report is to present, among other elements, a summary of field activities, the results of all laboratory analyses (including copies of the original lab reports and chain-of-custody forms), well boring logs, etc. Recommendations for additional work are to be included.

Please call me at 415/271-4320 when you have scheduled your drilling date or if you should have any questions.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Howard Hatayama, DHS
Bob Bohman, Castro Valley Fire Department
Jerry Kent, EBRPD
Steve Abhors, EDMUD
Bernard F. Rose, Randick & O'Dea
Rene Viviani
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02770

Certified Mailer # P 062 127 961

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

February 14, 1991

Mr. Rene Viviani
Willow Park Golf Course
17007 Redwood Road
Castro Valley, CA 94546

RE: REGIONAL WATER QUALITY CONTROL BOARD (RWQCB) MEETING

Dear Mr. Viviani:

Your attendance is requested at a meeting between representatives of the East Bay Municipal Utilities District (EBMUD), East Bay Regional Park District (EBRPD), RWQCB, and this Department to discuss the issues surrounding the continued environmental investigation associated with the former underground storage tank at your site. This meeting is scheduled for 1:00 PM on Wednesday, February 20, at the RWQCB offices, 1800 Harrison Street, Room 700, Oakland, adjacent to Lake Merritt. The meeting is scheduled to convene promptly.

Please be advised that all other expected participants at this meeting are being advised of the meeting date by way of copy of this letter.

Please call me at 415/271-4320 should you have any questions.

Sincerely,


Scott O. Seery
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Howard Hatayama, DHS
Bob Bohman, Castro Valley Fire Department
Jerry Kent, EBRPD
Steve Abbors, EBMUD
Rene S. Viviani, Willow Park Golf Course
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02770

Certified Mailer # P 062 127 957

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

January 30, 1991

Mr. Karl Stinson
Water Treatment Division
EBMUD
P.O. Box 24055
Oakland, CA 94623

RE: WILLOW PARK GOLF COURSE; 17007 REDWOOD ROAD, CASTRO VALLEY,
ALAMEDA COUNTY

Dear Mr. Stinson:

On August 28, 1990, one 1000 gallon underground storage tank (UST) was removed from the referenced site. Observations made in the field at the time of closure, as well as the results of laboratory analyses, confirmed that a release of product had occurred, likely as a result of historic overfilling.

A letter dated December 26, 1990 was sent from this Department to the operator of the referenced facility, Mr. Rene Viviani, identifying the need to perform a Preliminary Site Assessment (PSA) in order to identify the extent such a confirmed release may have had upon soils and ground water at this site. Mr. Viviani was directed to have a qualified and registered environmental consultant submit a PSA proposal for review by January 24, 1991. Instead of a PSA proposal, Mr. Viviani's son, Rene S. Viviani, authored a letter dated January 21, 1991 identifying several "facts" which he felt should negate the need to conduct the requisite site assessment. He closes the letter by informing this Department that it (the letter) should be considered as an "appeal" to the PSA requirement. A copy of the noted letter is attached for your review, as is a copy of the December 26, 1990 correspondence from this office. Copies of other records for this facility will be made available to you upon request.

This Department has only recently become aware that EBMUD is the owner of the property where Willow Park Golf Course is located. We did know, however, that Willow Park leased property from the East Bay Regional Park District (EBRPD), who in turn, as we now understand, leases the property from EBMUD. As owner of the subject property, please be advised that it is EBMUD who ultimately bears the responsibility for the assessment of potential environmental impacts from a confirmed release should the facility operators fail to do so.

Mr. Karl Stinson
RE: Willow Park Golf Course, 17007 Redwood Road
January 30, 1991
Page 2 of 2

For your information, the Porter-Cologne Water Quality Control Act (Water Code), the state law granting authority to the Regional Water Quality Control Board (RWQCB) for the protection of water resources within their specific regions, does not provide for an "appeal" process. However, following consultation with Mr. Lester Feldman of the San Francisco Bay RWQCB, this Department would care to meet with yourself and all concerned parties in the RWQCB offices, 1800 Harrison Street, Suite 700, Oakland, to discuss this case before initiation of an enforcement action. A specific meeting date will be arranged within the next two weeks. All known concerned parties are being informed of this meeting by way of copy of this letter.

Please contact this Department at your earliest convenience to determine an acceptable date for this meeting, or to answer any questions you may have regarding the content of this letter. The Department phone number is 415/271-4320.

Sincerely,



Scott O. Seery
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Howard Hatayama, DHS
Bob Bohman, Castro Valley Fire Department
Jerry Kent, EBRPD
Steve Abbors, EBMUD
Kevin Krause, KTW & Associates

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02770

Certified Mailer # P 062 128 114

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

December 26, 1990

Mr. Renee Viviani
Willow Park Golf Course
17007 Redwood Road
Castro Valley, CA 94546

RE: REQUEST FOR PRELIMINARY SITE ASSESSMENT PROPOSAL

Dear Mr. Viviani:

This Department has completed review of the September 25, 1990 KTW & Associates report documenting the results of soil sample analyses following the removal of one 500 gallon gasoline tank on August 28, 1990.

The results of laboratory analyses performed upon sample TX1-S2, collected from the fill end of tank pit, show a concentration of 35 parts per million (ppm) of total petroleum hydrocarbons as gasoline (TPH-G), as well as minor concentrations of ethylbenzene and total xylenes. Sample TX1-S1, collected from the opposite end of the tank, showed nondetectable (ND) concentrations of the target compounds. Samples were difficult to collect, particularly sample TX1-S2, as fractured shale bedrock was exposed approximately 6-10 inches beneath the tank. It was from this fractured bedrock that sample TX1-S2 was collected.

Observations of the tank indicate that it appeared sound. However, the tar coating surrounding the tank was to a significant degree dissolved at the fill end, strongly suggesting historical tank overfilling and spillage. Discolored soils beneath the tank and an odor of fuel emanating from the tank pit further supports the likelihood of historical overfilling.

As was stated above, the presence of bedrock directly beneath the tank made difficult the collection of representative samples. "Representative" samples must be relatively undisturbed when collected. Samples collected at this site required that bedrock fragments and debris be forced into the sampling tube, particularly in the case of sample TX1-S2 where such fragments were actually forced into the tube by hand. Such handling of the sampled media increases the volatilization of any contaminants present. Air voids within the sampling tube would be unavoidable, the presence of which tend to further increase the volatilization and eventual loss of compounds such as gasoline, thus reducing the concentrations of these compounds within the sample before a portion of the sample can be extruded for analyses, biasing the results. Even the extrusion

Mr. Renee Viviani
RE: Willow Park Golf Course, 17007 Redwood Road
December 26, 1990
Page 2 of 4

process is hampered by the hardness of the rock material. Further, because the presence of liquid contaminants, such as gasoline, will be limited to the fractures of this type of bedrock, such samples do not give an overall representative view of the actual concentration of contaminants present. Hence, samples of bedrock fragments are not an appropriate media for determining the extent and presence of subsurface contamination.

The prolific occurrence of vertical fractures in the bedrock underlying the site makes this bedrock highly permeable. Pollutants are known to migrate rapidly through such media. Further, this site is within the watershed of San Leandro Creek and Lake Chabot, making this site extremely sensitive to a potential release of fuel to the subsurface. Therefore, any detectable level of hydrocarbons in such environments warrant further investigation to determine what impact, if any, there has been upon soils and ground water in proximity to the site. Such an investigation shall be in the form of a Preliminary Site Assessment, or (PSA).

This requisite PSA will help to define the vertical and lateral impact upon ground water and soils resulting from any releases from the tank prior to its removal. The information gathered by this investigation will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks. The major elements of such an investigation are summarized in the attached Appendix A.

In order to proceed with a site investigation, you should obtain professional services of a reputable environmental/geotechnical firm. Your responsibility is to have the consultant submit for review a proposal outlining planned activities pertinent to meeting the criteria broadly outlined in this letter and the attached Appendix A.

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

Mr. Renee Viviani
RE: Willow Park Golf Course, 17007 Redwood Road
December 26, 1990
Page 3 of 4

This PSA proposal is due within 30 days of the date of this letter, or by January 24, 1991. Once this proposal has been reviewed and approved, work should commence no later than February 24, 1991. Accompanying this proposal must be a check payable to Alameda County totalling \$558 to offset expenses incurred by this Department during oversight of this project. This deposit is placed into an account from which money is drawn at the rate of \$60 per hour as time is dedicated to the project.

A report must be submitted within 30 days after the completion of this phase of work at the site. Subsequent reports must be submitted quarterly until this site qualifies for final RWQCB "sign off". Such quarterly reports are due the first day of the second month of each subsequent quarter (i.e., May 1, August 1, November 1, and February 1).

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

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

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 or a late response could result in the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Mr. Renee Viviani
RE: Willow Park Golf Course. 17007 Redwood Road
December 26, 1990
Page 4 of 4

Should you have any questions about the content of this letter,
please call me at 415/271-4320.

Sincerely,



Scott O. Seery
Hazardous Materials Specialist

enclosure

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Howard Hatayama, DHS
Bob Bohman, Castro Valley Fire Department
Tom Lindenmeyer, EBRPD
Kevin Krause, KTW and Associates
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02770

October 26, 1990

Manager
Willow Park Golf Course
17007 Redwood Rd.
Castro Valley, CA 94546

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

SECOND NOTICE OF VIOLATION

Dear Manager:

Our records indicate that there are underground tank(s) at your site at the above facility. You were notified of this situation months ago and have not taken the appropriate action as described below.

In accordance with the California Code of Regulations, Title 23, Chapter 3, Subchapter 16 Underground Tank Regulations you must perform one of the following actions:

1. Submit a tank closure plan to this Department as required by Article 7, 2670, forms available from this office, or
2. Apply for a permit as required by Article 10, 2710. Permit applications Part A and B are available from this office.

Please note that section 25299 of the California Health and Safety Code states that any operator or owner of an underground storage tank is liable for a civil penalty of not less than five hundred dollars or more than five thousand dollars per day for failure to obtain a permit, or failing to properly close an underground storage tank, as required by section 25298.

If you have any questions concerning this matter, please contact this office at 271-4320.

Sincerely,

Thomas F. Peacock, Senior HMS
Hazardous Materials Division

TFP:tfp

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02770

Certified Mailer #P 062 127 940

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

May 23, 1990

Mr. Rene Viviani
Willow Park Golf Course
17007 Redwood Road
Castro Valley, CA 94546

RE: UNDERGROUND STORAGE TANK REGISTRATION AND MONITORING, BUSINESS PLAN, AND ABOVE-GROUND FUEL STORAGE TANK PLANS; WILLOW PARK GOLF COURSE, 17007 REDWOOD ROAD, CASTRO VALLEY

Dear Mr. Viviani:

This letter shall serve to confirm our telephone conversation of May 18, 1990. As you may recall, you were informed that this Department recently learned of the existence of an unregistered underground storage tank (UST) at your facility. We understand that this tank is presently used to store unleaded gasoline. We further understand that the noted UST is not being monitored following acceptable monitoring protocol (e.g., yearly tank/piping integrity tests and reports, strict inventory reconciliation, quarterly submittal of reconciliation reports, etc.). Therefore, your facility is in violation of State UST laws and regulations set forth under Chapter 6.7 of the California Health and Safety Code (H & SC), and Section 2610 et seq. of Subchapter 16, Title 23, California Code of Regulations (CCR).

As a result of this tank's noncompliance with applicable law and regulations, you must perform one of the following actions:

- 1) Cease the storage of hazardous materials in the subject UST by way of closure of this tank. This may only be performed through the submittal of an Underground Storage Tank Closure/ Modification Plan application to this Department for review and approval, pursuant to the requirements under Article 7, 23 CCR. Once approved, the Closure Plan may be implemented and the tank removed; or,
- 2) Apply for a permit to operate the UST through the submittal of the State Underground Storage Tank Registration Forms (Forms A and B). This choice will further require that this UST be monitored according to an approved monitoring alternative as described under Section 2641(c)(1)-(7), 23 CCR, inclusive. Monitoring methods must be approved by this office.

Mr. Rene Viviani
RE: 17007 Redwood Road, Castro Valley
May 23, 1990
Page 2 of 3

You are directed to notify this Department in writing within 15-days of the date of this letter, or by June 7, 1990, of your plans to bring the existing UST into compliance with the referenced laws and regulations. Once notified of your intentions, the proper forms and instructions will be forwarded to you by this Department.

Plans have recently been submitted to this Department for the installation of a ConVault above-ground fuel storage tank. These plans have evidently been approved already by the Castro Valley Fire Department. The noted plans have not been reviewed nor approved by this Department. Please be advised that before these plans will be approved, you must comply with all other laws and regulations applicable to this facility, as follows:

- 3) As noted in items 1 and 2, above, you must comply with Chapter 6.7, H & SC, and Subchapter 16, 23 CCR; and,
- 4) Submit a Hazardous Materials Business Plan.

Business plans are required under Chapter 6.95 of the H & SC, Section 25500 et seq., of those facilities which store, dispense, use, or otherwise handle, or generate as waste, any hazardous materials exceeding threshold quantities specified by the State. Gasoline, diesel, certain lubricants and coolants, as well as pesticides or herbicides, are some of the typical "hazardous" materials you may likely store or use, or plan to store or use, for the normal operation of your business. Attached please find a packet of information which includes: a blank Hazardous Materials Business Plan; a set of instructions; and, copies of several reference documents to aid you in completion of this Plan.

Please note that you must comply with the laws and regulations relevant to UST registration/closure, and business plan submittal regardless of the outcome of your decision to install, or not to install, the above-ground fuel storage tank.

Your Hazardous Materials Business Plan must be submitted within 30-days of the date of this letter, or by June 22, 1990. Please be advised that the failure to submit a business plan following notification of the requirement to submit such a plan is a violation of Section 25503.5, H & SC, and may subject you to penalties specified by law.

Mr. Rene Viviani
RE: 17007 Redwood Road, Castro Valley
May 23, 1990
Page 3 of 3

Should you have any questions, please call me at 415/271-4320.

Sincerely,



Scott O. Seery
Hazardous Materials Specialist

SOS:sos

enclosure

cc: Rafat A. Shahid, Assistant Agency Director, Alameda County
Department of Environmental Health
Ed Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Bob Bohman, Castro Valley Fire Department
Mike Hood, Alameda County Building Inspection Department
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02770

May 16, 1990

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

Manager
Willow Park Golf Course
17007 Redwood Rd.
Castro Valley, CA 94546

NOTICE OF LEGAL OBLIGATION

Dear owner/operator:

Our records indicate that there are underground tank(s) at your site at the above facility.

In accordance with the California Code of Regulations, Title 23, Chapter 3, Subchapter 16 Underground Tank Regulations you must perform one of the following actions:

1. Submit a tank closure plan to this Department as required by Article 7, 2670, or
2. Apply for a permit as required by Article 10, 2710.

Please note that section 25299 of the California Health and Safety Code states that any operator or owner of an underground storage tank is liable for a civil penalty of not less than five hundred dollars or more than five thousand dollars per day for failure to obtain a permit, or failing to properly close an underground storage tank, as required by section 25298.

If you have any questions concerning this matter, please contact this office at 271-4320.

Sincerely,

Thomas F. Peacock, Senior HMS
Hazardous Materials Division

TFP:tfp

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