

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
06-02-06

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

June 1, 2006

Thomas L. Robinson
Robinson Oil Corporation
4250 Williams Road
San Jose, CA 95129

Edwin Coats
East Avenue Services
1727 Dolphin Place
Discovery Bay, CA 94514

Subject: Fuel Leak Case No. RO0002881, East Avenue Services, 4186 East Avenue, Livermore, CA - Work Plan Approval

Dear Mr. Robinson and Mr. Coats:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Work Plan for Preliminary Site Investigation," dated April 4, 2006, prepared on your behalf by RM Associates. The Work Plan proposes the installation, development, and sampling of three monitoring wells. The scope of the proposed work is limited but ACEH generally accepts the proposed scope of work provided that the technical comments below are addressed during well installation and sampling.

Replacement of all USTs, product piping, and dispensing facilities is scheduled during station renovation in summer 2006. During the station renovation, contaminated soil should be excavated and disposed of properly to the extent practicable. Results of the UST, product piping, and dispenser removal will be reviewed to assess the need for additional investigation and/or remediation in the area of the USTs, product piping, and dispensers.

ACEH requests that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. **Soil Samples:** The Work Plan proposes to collect soil samples at five-foot intervals for logging purposes. ACEH requests that soils be continuously sampled for logging purposes. The soil samples are to be screened in the field to select samples for chemical analyses. Soil samples are to be submitted for analyses for all depth intervals where staining, odor, or elevated PID readings are observed. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval. We concur that one soil sample collected from the capillary fringe is to be submitted for laboratory analysis from each soil boring. If no

staining, odor, or elevated PID readings are observed, a minimum of three soil samples, one collected at the capillary fringe and two collected at changes in lithology, are to be submitted for laboratory analysis from each soil boring. Please present the results in the Soil and Groundwater Investigation Report requested below.

2. **Well Screen Length.** The monitoring well screens are to be no greater than 15 feet in length and are to extend no more than 8 feet below the water table at the time of well installation to avoid cross contamination of water-bearing layers. Please present the results in the Soil and Groundwater Investigation Report requested below.
3. **Vertical Delineation.** The Work Plan does not include plans for vertical delineation of contamination. Based on the hydrogeology of the area and potential age of the release, vertical delineation is required. Please describe plans for vertical delineation in the Soil and Groundwater Investigation Report requested below.
4. **Laboratory Analyses.** In addition to the proposed analytes, please analyze soil samples for total lead using EPA Method 8010.
5. **Geotracker EDF Submittals.** A review of the case file and the State Water Resources Control Board's (SWRCB) Geotracker website indicate that electronic copies of analytical data have not been submitted for your site. Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all analytical data (collected on or after September 1, 2001), to the SWRCB's Geotracker database website in accordance with the above-cited regulation. Please perform the electronic submittals for applicable data and submit verification to this Agency by July 28, 2006.

TECHNICAL REPORT REQUEST

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

- **90 days after UST Removal but no later than December 1, 2006 - Soil and Groundwater Investigation Report**
- **120 days after ACEH approval of Work Plan - Soil and Groundwater Investigation Report**

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

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).

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

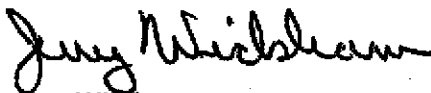
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Matt Katen, QIC 80201
Zone 7 Water Agency
100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani
Livermore-Pleasanton Fire Department
3560 Nevada Street
Pleasanton, CA 94566

Ronald Michelson
RM Associates
16401 Meadow Vista Drive, Suite 102
Pioneer, CA 95666

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02981

RAFAT A. SHAHID, Assistant Agency Director

April 6, 1992

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

Mr. E. F. Coates, Jr.
East Avenue Services, Inc.
4186 East Avenue
Livermore, CA 94550

Re: FIVE-YEAR PERMITS FOR OPERATION OF SIX
UNDERGROUND STORAGE TANKS (UST'S) AT 4186
EAST AVENUE LIVERMORE.

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

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

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

Sincerely,

R. Arulanantham

Ravi Arulanantham
Senior Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney,
Rafat Shahid, Assistant Agency Director, Alameda
County Department of Environmental Health
Danielle Stefani, Hazardous Materials Specialist, City of
Livermore Fire Department

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

R02881

December 7, 1990

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

Ms. Doreen P. Meyer
Environmental Specialist
Harding Lawson Associates
1355 Willow Way, Suite 109
Concord, CA 94520

Dear Ms. Meyer:

In a letter to this office dated November 19, 1990, as well as in subsequent telephone conversations, you requested information on the following locations in Livermore:

- (R01056) 1. J & W Development, 2920 4th St. (after July 1989).
- (R02881) 2. Texaco service station, 4186 East Ave.
3. Allan Hyne, 792 S. I St.
- (R02873) 4. Arco filling station, 286 S. Livermore Ave.
- (R0769, R02525) 5. Shell service station, 318 S. Livermore Ave.
6. Clifford Bates, 887 S. Livermore Ave.
- (R0904) 7. Unocal service station, 900 S. Livermore Ave. (after Feb. 1988)
8. Bud's Backhoe Service, 2060 S. Livermore Ave.
9. Hexcel, 10 Trevarno Rd. (information on groundwater plume).

In response, the Hazardous Materials Division has reviewed its hazardous waste generator, underground tank, Hazardous Materials Management Plan, and emergency response files for each of these sites. Pertinent information is outlined below, by site.

(R01056) J & W Development, 2920 4th St.

This site has had widespread soil contamination, resulting from the leakage of three underground storage tanks. The one diesel and two gasoline tanks were removed in July 1989, after which high levels of hydrocarbons were found beneath and adjacent to them. Diesel appeared to be the most prevalent hydrocarbon, and extended to a depth of about 35 feet below ground surface. Excavation in early 1990 to remove all contaminated soil resulted in the stockpiling of approximately 1,500 cubic yards; this soil was bioremediated over the spring and summer of 1990 on site, using "landfarming." This effort succeeded, since hydrocarbon levels in these soils have been reduced to "ND," and the soil has been replaced in the excavated pits. Groundwater is estimated to be at a depth of 60-65 feet; while there is no information available on whether groundwater has been affected, monitoring wells will be installed in the future.

(R02881) Texaco, 4186 East Ave.

This service station has six underground storage tanks, five gasoline and one waste oil. Our office last inspected the site in May 1990;

Ms. Doreen P. Meyer
December 7, 1990
Page 2 of 3

violations noted at the time were inadequate tank monitoring and recordkeeping, and lack of documentation for precision leak tests and daily inventory reconciliation. There is no information in the file regarding any unauthorized releases.

792 S. I St.

At this site there is a 550-gallon diesel underground tank that was installed in 1974. The owner is not currently using it. This office issued the owner/operator an interim operating permit in March 1988, with the last inspection taking place in October 1988. There are no records on file of precision leak tests or inventory reconciliation, nor is there any information on unauthorized releases.

(R02873) Arco, 286 S. Livermore Ave.

This is a "minimart" with three underground tanks. These tanks passed precision leak tests in March 1988 and March 1989. A leak was found in the supreme unleaded pipeline on September 25, 1990, after which Arco repaired the line and conducted a precision leak test of this and the other two tank systems. On November 13, all systems appeared tight, and the station has returned to business as usual. An investigation is planned for soil and possible groundwater contamination.

(R076A) Shell, 318 S. Livermore Ave.

(R02525) At this site, an operating service station, the waste oil tank was removed and replaced with a new one in August 1987; then, in December 1989, the four gasoline tanks were removed and replaced with three new tanks. According to file documents, less than 100 ppm of hydrocarbons were found beneath the waste oil tank, but up to 870 ppm of TPH-G was found beneath the gasoline tanks. Prior to the installation of the new gasoline tanks, additional soil was removed; after the new tanks went into operation, Shell's consultant drilled four soil borings that were converted to monitoring wells; nothing was detected in either the soil or water samples from these holes (collected and analyzed June 1990).

887 S. Livermore Ave.

One 550-gallon gasoline tank was removed from this residence in March 1990. Because no contamination was found in samples collected from beneath the tank, this office issued a "no further action" letter to the property owner.

(R0904) Former Unocal, 900 S. Livermore Ave.

This site is currently vacant, with all underground tanks at the site having been removed in 1987. The file information for early 1988

Ms. Doreen P. Meyer
 December 7, 1990
 Page 3 of 3


consists of a consultant's report to Unocal dated February 11, 1988. This report makes the following points:

- Additional excavation of the former waste oil pit occurred to a depth of about 9 feet, where the soil appeared clean;
- About 60 cubic yards of contaminated soil from this pit was hauled to a Class I disposal site; and
- Groundwater is estimated at a depth of 30 feet, but no wells were installed to test the water.

There are no other reports on this site to date.

Bud's Backhoe Service, 2060 S. Livermore Ave.

This is an unpaved contractor's staging yard behind a small horse ranch. There is surface storage of oils, solvent, and above-ground fuel tanks. The site is recorded as having two underground tanks, but there is no file on any underground tanks, and based on a site visit November 27, 1990 (no one was around), there appeared to be no USTs on the property.

Hexcel, 10 Trevarno Rd. 

This site is complex, with the RI/FS taking place under the oversight of the Regional Water Quality Control Board. The plume of contaminated groundwater has not been fully defined. Enclosed are several figures and a table, that provide some information on well locations and contaminants found in them.

This letter contains information limited to files in this office, and does not reflect data that may be available from other agencies or parties. You will be billed for provision of this service at the rate of \$60 per hour; enclosed is a copy of the invoice sent to our Billing Department. If you have any questions concerning this letter, please contact the undersigned at 271-4320.

Sincerely,

Gilbert M. Wistar

Gil Wistar
 Hazardous Materials Specialist

Enclosures

c: Rafat A. Shahid, Asst. Agency Director, Environmental Health files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02881

May 31, 1990

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

Mr. E. F. Coats, Jr.
East Avenue Services, Inc.
4186 East Ave.
Livermore, CA 94550

Re: Summary of underground tank regulations for the State of
California, as requested

Dear Mr. Coates:

As you recall, the Alameda County Department of Environmental Health, Hazardous Materials Division inspected your facility on May 29, 1990; during the inspection, you had some questions about applicable state laws regarding monitoring and upgrading of underground tanks. The following is a summary of these laws and regulations, which conform largely to federal law. (In some instances however, state law is more stringent than federal law.)

Monitoring Requirements

For underground tanks installed before January 1, 1984, the California Code of Regulations, Title 23, Chapter 3, Subchapter 16, Sec. 2641 specifies eight monitoring alternatives. Of these eight, only four are applicable to filling stations within Alameda County. Most gas stations use alternative #5, which for each tank consists of:

- annual precision testing of the entire tank system, including piping;
- daily inventory reconciliation, with the records kept on file for one year (manifolded tanks may be considered as one system); and
- continuous pipeline leak detection.

Tank System Upgrades

State law specifies that pre-1984 tank systems in California must be upgraded to provide better protection against unauthorized releases to the environment. These statutes are found in the California Health and Safety Code (H&SC), Division 20, Chapter 6.7, Sec. 25292.

By December 22, 1998, all underground tank systems must be replaced or upgraded to prevent releases due to corrosion or spills or overfills for the tanks' operating lifetimes.

Mr. E. F. Coates, Jr.
May 31, 1990
Page 2 of 2

- All existing underground pressurized piping must be equipped with automatic line leak detectors by December 22, 1990.
- All piping must have secondary containment by December 22, 1998.
- Underground tank owners or operators must comply with financial responsibility requirements (outlined below) by October 26, 1990.

Financial Responsibility

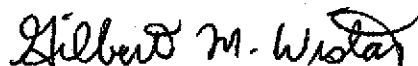
The H&SC, Division 20, Chapter 6.75, Sec. 25299.31, addresses financial responsibility requirements that either the station owner or operator must comply with. The purpose of these laws is to ensure that the owner/operator has the financial means to take corrective action and compensate third parties for bodily injury and property damage that could arise from the operation of an underground tank. As an owner/operator, you are required to prove a level of financial responsibility of \$50,000 per occurrence and \$50,000 annual aggregate coverage for taking corrective action.

If you would like copies of the actual text of these laws and regulations, you can order them from:

Barclay's Law Publisher
P.O. Box 3066
South San Francisco, CA 94083
(415) 244-6611

If you have any questions about this letter, please contact the undersigned at 271-4320.

Sincerely,



Gil Wistar
Hazardous Materials Specialist

c: Randy Griffith, Livermore Fire Dept.
Rafat A. Shahid, Asst. Agency Director, Environmental Health files