

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



11-18-02

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

November 14, 2002

Mr. Binayak Acharya
Nestle' USA
800 North Brand Blvd.
Glendale, CA 91203

Dear Mr. Acharya:

Subject: Fuel Leak Case RO0000018, 1310 14th St., Oakland CA 94607

Alameda County Environmental Health, Local Oversight Program (LOP), has discussed the current and future status of the referenced site with Mr. Roger Brewer of the SFRWQCB. As you are aware, we have concurred with the destruction of all but eleven (11) wells required to monitor the stability of the petroleum plume. These wells should be monitored semi-annually for a period of two years. Should the plume be verified as not migrating, with concentrations of contaminants not migrating off-site above MCLs, you may request site closure after completing the requested monitoring. The City of Oakland will be required to ensure that the requirements of the deed restriction on this property are maintained in the future.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. B. Searcy, ETIC Engineering, 2285 Morello Ave., Pleasant Hill, CA 94523

Mr. R. Brewer, SFRWQCB

Stat1310 14thSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



10-22-02

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

October 21, 2002

Mr. Binayak Acharya
Nestle USA, Inc.
800 North Brand Blvd.
Glendale CA 91203

Dear Mr. Acharya:

Subject: Fuel Leak Case RO0000018, Proposed Well Abandonment at Nestle Oakland Facility,
1310 14th St., Oakland CA 94607

This letter confirms the receipt and approves of the proposed well abandonment of all wells (approximately 128) with the exception of the eleven (11) wells noted in the 10/14/02 e mail from Mr. Brent Searcy of ETIC Engineering. These eleven wells consist of MW5, MW25 through MW30, MW32, MW100, CC1* and CC2*. These wells should continue to be monitored on a semi-annual schedule for the analytes, TPHd, TPHg, BTEX, MTBE and VOCs.

You may proceed with the well abandonment. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. B. Searcy, ETIC Engineering, 2285 Morello Ave., Pleasant Hill, CA 94523

Mr. R. Brewer, SFRWQCB

2Well1310 14th St.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



08-09-01

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

August 8, 2001
StID 3779/RO0000018✓

Mr. Binayak Acharya
Nestle USA, Inc.
800 North Brand Blvd.
Glendale CA 91203

**Re: Proposed Well Abandonment at Nestle Oakland Facility, 1310 14th St.,
Oakland CA 94607**

Dear Mr. Acharya:

This letter confirms the receipt and approves of the proposed well abandonment of 32 wells noted in the July 26, 2001 letter report from ETIC Engineering, Inc., your consultant. It appears that all but three of the proposed wells are either vapor wells or "numbered wells" and of these 29, 27 are of unknown well construction. The three product recovery wells proposed for abandonment have other recovery wells nearby them to compensate. None of these wells provides necessary sampling information so technically no compromise has been made.

You may proceed with the well abandonment. Please include this information in the future well summary table, requested at our last meeting at the San Francisco Water Board.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. B. Searcy, ETIC Engineering, 2285 Morello Ave., Pleasant Hill, CA 94523
Mr. C. Headlee and Mr. R. Brewer, SFRWQCB

Well#1310 14th St.

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

2018

March 7, 2000

ENVIRONMENTAL HEALTH SERVICES

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

Mr. Binayak Acharya
Nestle USA
800 North Brand Blvd.
Glendale, CA 91203
STID 3779

RE: Nestle USA, Inc., 1310 14th Street, Oakland, CA 94607

Dear Mr. Acharya:

Ms. Betty Graham of the Regional Water Quality Control Board, San Francisco Bay (RWQCB) Region informed me that she met with you and your consultant in her office last week. Please send me a copy of the minutes of your meeting with the RWQCB. The minutes at a minimum should include the following:

- 1) Date of meeting
- 2) Names and company affiliation of all persons attending the meeting
- 3) Topics and issues discussed
- 4) Any agreements or approval relating to the site investigation, remediation, monitoring or closure requirements

It is the understanding of both the RWQCB and this office that Alameda County Environmental Health is the lead agency overseeing the investigation and remediation of the above site. In the future, please inform this office when a meeting is scheduled with a regulator concerning the site investigation, remediation, monitoring and closure requirements for the above site.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Betty Graham, RWQCB, 1515 Clay Street, Suite 1400, Oakland, CA 94612
Doug Oram, ETIC Engineering, 144 Mayhew Way, Walnut Creek, CA 94596
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

2018

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

July 15, 1999

Dr. Douglas Oram
ETIC Engineering, Inc.
144 Mayhew Way
Walnut Creek, CA 94596
STID 3779

RE: Former Carnation, 1310 14th Street, Oakland, CA 94607

Dear Dr. Oram:

I have received the monitoring well information sent with your cover letters dated June 9 and July 12, 1999. As requested in your letters, the following monitoring wells can be closed:

MW-1	MW-2	MW-4	MW-5	MW-9	MW-10
MW-11	MW-12	MW-13	MW-14	MW-16	PR100
240	241	PR15	250	249	233
81	231	V24	PR203	PR206	PR202
224	PR201	V46	94	200	201
202	203	204	205	206	207
208	209	210	212	214	215

Please forward to my attention any Quarter Monitoring Reports subsequent to third and fourth quarters 1998.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,

Larry Seto
Sr. Hazardous Materials Specialist

Cc: Mr. Binayak Acharya, Nestle, 800 North Brand Blvd, Glendale, CA 91203
Leroy Griffin, City of Oakland Fire, 505-14th Street, 7th Floor,
Oakland, CA 94612

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R018

June 28, 1999

ENVIRONMENTAL HEALTH SERVICES

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

Dr. Douglas Roam
ETIC Engineering, Inc.
144 Mayhew Way
Walnut Creek, CA 94596
STID 3779

RE: Former Carnation, 1310 14th Street, Oakland, CA 94607

Dear Dr. Oram:

I have received your letter dated June 9, 1999 proposing the abandonment of monitoring wells at the above site. To assist me in evaluating your proposal, please submit the following information to me:

- 1) Summary of the monitoring/sampling history for the wells proposed for abandonment
- 2) Copy of the monitoring well construction diagram for the wells proposed for abandonment

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Mr. Binayak Acharya, Nestle, 800 North Brand Blvd., Glendale, CA 91203
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R018

ENVIRONMENTAL HEALTH SERVICES

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

May 19, 1998

ATTN: Sir Or Madam

Carnation Company
800 N Brand Blvd.
Glendale CA 91203

RE: Project # 346A - Type A
at 1310 14th St in Oakland 94607

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 \$223.20, 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



RO#18

March 25, 1997
STID 3779
page 1 of 3

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

Binayak Acharya
Nestle USA, Inc.
800 North Brand Blvd.
Glendale CA 91203

RE: Former Carnation Dairy Site, 1310-14th St., Oakland CA 94607

Dear Mr. Acharya,

Since my last letter to Nestle, dated 4/9/96, the following documents have been received in this office:

- 1) "Report of Quarterly Sampling and Analysis," prepared by EA Engineering, dated April 1996;
- 2) "Draft Interim Product Recoverability Report," prepared by EA Engineering, dated May 1996;
- 3) "Product Recoverability and Vapor Extraction/Air Sparging Pilot Test Report," prepared by EA Engineering, dated July 1996;
- 4) "2nd Quarter 1996 Groundwater Monitoring Report," prepared by EA Engineering, dated July 1996;
- 5) letter from EA Engineering, dated 9/26/96 (re selection of a product recovery system);
- 6) "3rd Quarter 1996 Groundwater Monitoring Report," prepared by EA Engineering, dated October 1996;
- 7) transmittal from EA Engineering, dated 11/7/96 (scientific papers re micropurging);
- 8) fax from Earth Engineers, dated 11/4/96 (scientific paper re micropurging);
- 9) fax from Earth Engineers, dated 11/4/96 (letter from Earth Engineers dated 11/4/96 re effect of Carnation/Nestle site on 1350-16th St. site);
- 10) fax from Earth Engineers, dated 11/17/96 (letter from Earth Engineers dated 11/17/96 re micropurging);

March 25, 1997
STID 3779
page 2 of 3
Binayak Acharya

- 11) letter from EA Engineering, dated 11/27/96 (re amended quarterly sampling schedule);
- 12) "4th Quarter 1996 Groundwater Monitoring Report," prepared by EA Engineering, dated December 1996;
- 13) fax from yourself, dated 1/8/97 (re project schedule);
- 14) fax from Earth Engineers, dated 3/16/97 (lab report for MW-28 sampling in 1996); and
- 15) "1st Quarter 1997 Monitoring Report," prepared by EA Engineering, dated March 1997.

In addition, I met with EA Engineering representatives, yourself, and others during site visits on 7/16/96, 10/10/96, and 10/31/96, and I prepared field reports for each visit.

During a telecon with Doug Oram of EA Engineering on 3/25/97, he indicated that the **multi-phase extraction system** is being built at present, and should be onsite within a month. He also indicated that the permitting is not yet complete. **Note that we are behind schedule**, as per your 1/8/97 fax. Doug Oram also indicated that **the former waste oil UST does not appear to be the source of the HVOCs**, (as we expected) as per the 1st quarter HVOC results. The source of the HVOCs remains unknown. **(Please include a "conclusions" section in future reports.)**

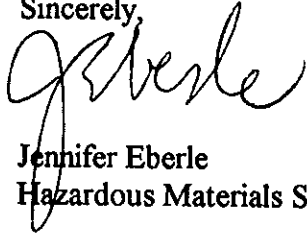
It was noted that the concentrations of 1,2-DCA in wells MW-26 and E-7 were reported as >50 and >120 ppb, respectively. This is a most unusual way of reporting results. As you know, the presence of this particular constituent has been a source of controversy between Nestle and the adjacent property owner. In an attempt to define the 1,2-DCA plume, **you are therefore requested to quantify the concentrations of all HVOCs in future sampling events. In addition, please include isoconcentration maps for 1,2-DCA in future quarterly reports.**

In response to Doug Oram's inquiry about how to manage the solvent plume with concentrations in excess of MCLs, please be advised that EPA's Preliminary Remediation Goals (PRGs) apply to drinking water. Since groundwater in the site vicinity is not used for drinking water, the PRGs are no more applicable than MCLs. Therefore, your options for the **groundwater solvent plume** would be remediation and/or risk assessment. The GSI software used for determining hydrocarbon RBSLs or SSTLs via the ASTM guidance can also determine solvent RBSLs or SSTLs.

If you have any questions about this letter, please contact me at 510-567-6761.

March 25, 1997
STID 3779
page 3 of 3
Binayak Acharya

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Walter Carey, Nestle USA, Inc., 60 Boardman Rd., New Milford CT 06776
Doug Oram, EA Engineering, Science, and Technology, 3468 Mt. Diablo Blvd., Suite B-
100, Lafayette CA 94549
J. Eberle/file

je.3779-B

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#18

Alameda County Environmental Health Div.
Mail Code: 430-4580
Environmental Protection Services
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577

April 9, 1996
STID 3779

Binayak Acharya
Nestle USA, Inc.
800 North Brand Blvd.
Glendale CA 91203

RE: Former Carnation Dairy Site, 1310-14th St., Oakland CA 94607

Dear Mr. Acharya,

Since my last letter to Nestle, dated 4/28/95, the following documents have been received in this office:

- 1) "Vapor Extraction Monitoring Report," dated February 1995, prepared by Park
- 2) "First Quarter 1995 Groundwater Monitoring Report," dated June 1995, prepared by Park
- 3) "Second Quarter 1995 Groundwater Monitoring Report," dated August 1995, prepared by Park
- 4) "Third Quarter 1995 Groundwater Monitoring Report," dated November 1995, prepared by Park
- 5) letter from EA, dated 12/8/95, regarding schedule of submittal of quarterly reports
- 6) letter from EA, dated 1/31/96, regarding accomplishments and future events
- 7) "Report of Quarterly Sampling and Analysis," dated February 1996, prepared by EA
- 8) "Workplan to Perform Additional Site Activities," dated March 1996, prepared by EA

This letter is being written to document our 1.5 hour long conference call today, with your consultant Doug Oram of EA Engineering, Science, and Technology. First, we discussed the results of the recent free product recovery testing, performed by EA. **As we agreed, a report on free product recovery testing will be submitted to me by the first week of May, 1996.** We also discussed future free product recovery activities. **We agreed to remove free product directly, by peristaltic pump, on a weekly basis, beginning next week, for a period of four consecutive weeks. A report will be submitted to me after four consecutive weeks, at which time we will discuss any changes to the frequency of free product removal, as well as any other changes.**

April 9, 1996
STID 3779
page 2 of 2
Binayak Acharya

Second, we discussed the recent air sparging/vapor extraction (AS/VE) pilot test, performed by EA. As we agreed, a report on the AS/VE testing will also be submitted to me by the first week of May, 1996.

Third, we discussed the possibility of utilizing bioslurping technology in the future. This may or may not occur simultaneously with AS and VE.

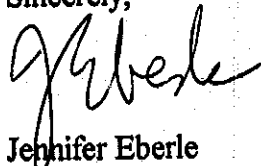
Fourth, we agreed to replace the well box on MW-27 and sample this well next quarter (June 1996), for TPHg, TPHd, BTEX, and HVOCs (by 8010). If results are ND, we will wait until the first quarter 1997 to resample MW-27.

Fifth, we agreed to the following modified sampling frequency: quarterly in MW3, MW26, and MW28. Semi-annually (first and third quarters) in MW2, MW6, MW25, MW29, MW30, and MW32. The frequency for MW27 will be established after data is generated. The reasons for modifying the sampling frequency are 1) we have had quarterly data since 3/93 in these wells, 2) additional quarterly data will not gain much more insight into these wells, and 3) all but MW32 have been either ND, below MCLs, or trace concentrations.

Sixth, I urged you to contact the SWRCB Clean Up Fund in advance of remediation implementation, in order to verify eligibility for reimbursement. I understand that you are in Category D. You may contact Steve Marquez at 916-227-0746, or Chris Stevens at 916-227-4519 of the Clean Up Fund.

Allow me to reiterate that free product removal is the primary concern of this agency. If you have any questions about this letter, please contact me at 510-567-6761.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Walter Carey, Nestle USA, Inc., 60 Boardman Rd., New Milford CT 06776
Doug Oram, EA Engineering, Science, and Technology, 3468 Mt. Diablo Blvd., Suite B-100, Lafayette CA 94549
Acting Chief/file

je.3779-A

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R018

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

April 28, 1995
STID 3779

Attn: Walter Carey
Nestle USA, Inc.
60 Boardman Rd.
New Milford CT 06776

Re: Former Carnation Dairy site, 1310-14th St., Oakland CA
94607

Dear Mr. Carey,

The last quarterly report which has been received in this office is for the Third Quarter 1994, prepared by Park Environmental, dated December 1994. The cover letter for this report was dated 1/31/95; the report was received in our office on 2/6/95. This report documents monitoring and sampling activities for 8/31/94. As you can see, the time between sampling and report receipt is nearly 5.5 months. At least one additional sampling event has elapsed during 5.5 months. **You are therefore requested to submit quarterly reports on a more timely basis, specifically no later than 3 months after future sampling events.**

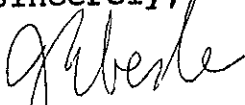
The last Vapor Extraction System update submitted to our office was dated 5/19/94, and included the period from 10/93 to 4/94. As you know, free floating product still exists on the groundwater table. The average thickness measured during the 8/31/94 event was 0.41 feet, as per the December 1994 Park report. **Please submit another Vapor Extraction System (VES) update within 30 days, or by May 28, 1995.** I understand that this update has already been drafted, and is currently being reviewed by Nestle USA. Therefore, I believe 30 days is more than adequate, or at least a reasonable deadline. **The VES update need not include AQMD reports. However, it should include data on the change in free product thickness over time. It should also include amounts of product removed over time. This was illustrated graphically in the 5/19/94 VES update.**

I discussed these issues with Dick Zipp of Park Environmental just today. He agreed that it would not be a problem to comply with these requests.

If you have any questions, you may contact me directly at 510-567-6761.

April 28, 1995
STID 3779
Attn: Walter Carey
page 2 of 2

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Dick Zipp, Park Environmental, 8084 Old Auburn Rd, Suite E,
Citrus Heights CA 95610
Vinayak Acharya, Nestle USA, 800 North Brand Blvd, Glendale
CA 91203
Bill Reynolds, Acting Chief/file

je.3779

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R018

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 3, 1993
STID 3779

Walter Carey
Nestle USA Inc.
100 Manhattanville Rd.
Purchase NY 10577

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

RE: Carnation Dairy
1310-14th St.
Oakland CA 94607

Dear Mr. Carey,

We are in receipt of a letter from Park Environmental (Park) dated 2/16/93, requesting a modification of the quarterly groundwater monitoring program. This proposal involves the quarterly sampling of MW3, MW25, MW26, MW27, MW28, MW29, MW30, and MW32. Most of these wells (MW25 through MW29) are downgradient wells in 16th St. These wells are important in gauging offsite migration of the free product plume. In order to assess the dissolved constituents more accurately, we request that you add the following wells to the sampling matrix: MW2, MW5, MW6, MW7, MW8, MW13, MW14, MW22, MW23, and MW24. Several of these wells contained free product last quarter, and therefore will not in effect be part of the analytical work. Those wells included MW7, MW8, MW22, and MW24. For some reason, MW2 and MW23 were not included in Table 1, Groundwater Measurements of the 12/12/92 "Quarterly Groundwater Monitoring Report" by Park. The reason these wells were not sampled is that they may not have been located, according to a phone conversation between Peter Frank of Park and myself on 2/25/93. Therefore, this may in effect reduce the additional number of wells to be analyzed to four: MW5, MW6, MW13, and MW14.

VOCs have been detected in wells MW26 (downgradient) and MW32 (upgradient). The VOC plume must be fully defined, which may involve adding wells to the VOC sampling matrix in the future. This was discussed with Peter Frank on 2/25/93.

We are also in receipt of a "Workplan for Soil and Groundwater Remediation" by Park, dated 2/10/93. As you know, this workplan involves the use of vapor extraction with thermal oxidation for impacted soil and groundwater. Additional information was received by fax on 2/2/93 from Peter Frank of Park. This information included a time schedule for remedial activities and a piping layout map of the anticipated VES system. **With this additional information, the workplan is acceptable for implementation.**

Walter Carey
STID 3779
March 3, 1993
page 2 of 2

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

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Richard Zipp, Park Environmental, 2140 Professional Dr.,
Suite 130, Roseville CA 95661
Rich Hiett, RWQCB
Ed Howell/File

je

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R018

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 1, 1993
STID 3779

Walter Carey
Nestle USA Inc.
100 Manhattanville Rd.
Purchase NY 10577

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

RE: Carnation Dairy
1310-14th St.
Oakland CA 94607

Dear Mr. Carey,

We are in receipt of a letter from Park Environmental (Park) dated 2/16/93, requesting a modification of the quarterly groundwater monitoring program. This proposal involves the quarterly sampling of MW3, MW25, MW26, MW27, MW28, MW29, MW30, and MW32. Most of these wells (MW25 through MW29) are downgradient wells in 16th St. These wells are important in gauging offsite migration of the free product plume. In order to assess the dissolved constituents more accurately, we request that you add the following wells to the sampling matrix: MW2, MW5, MW6, MW7, MW8, MW13, MW14, MW22, MW23, and MW24. Several of these wells contained free product last quarter, and therefore will not in effect be part of the analytical work. Those wells included MW7, MW8, MW22, and MW24. For some reason, MW2 and MW23 were not included in Table 1, Groundwater Measurements of the 12/12/92 "Quarterly Groundwater Monitoring Report" by Park. The reason these wells were not sampled is that they may not have been located, according to a phone conversation between Peter Frank of Park and myself ^{on} 2/25/93. Therefore, this may in effect reduce the additional number of wells to be analyzed to four: MW5, MW6, MW13, and MW14.

VOCs have been detected in wells MW26 (downgradient) and MW32 (upgradient). The VOC plume must be fully defined, which may involve adding wells to the sampling matrix in the future. This was discussed with Peter Frank on 2/25/93.

We are also in receipt of a "Workplan for Soil and Groundwater Remediation" by Park, dated 2/10/93. As you know, this workplan involves the use of vapor extraction with thermal oxidation for impacted soil and groundwater. As was discussed with Peter Frank of Park on 2/25/93, we would like a time schedule for the individual items outlined in the scope of work (section 3.1). We would also like a schematic map outlining the initial piping connections of the system. This was also discussed with Peter Frank on 2/25/93. The workplan will be accepted for implementation upon the satisfactory submittal of this information.

Walter Carey
STID 3779
March 1, 1993
page 2 of 2

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

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Richard Zipp, Park Environmental, 2140 Professional Dr.,
Suite 130, Roseville CA 95661
Rich Hiett, RWQCB
Ed Howell/File

je

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



R018

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

December 18, 1992

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

STID 3779

Walter Carey
Nestle USA Inc.
100 Manhattanville Rd.
Purchase NY 10577

RE: Carnation Dairy
1310-14th St.
Oakland CA 94607

Dear Mr. Carey,

We have received the "Quarterly Groundwater Monitoring Report," prepared by Park Environmental, dated 12/12/92. Up to 2.8 feet of floating product was detected in a groundwater plume which appears to be limited onsite. However, BTEX was detected in the offsite, downgradient monitoring wells located in 16th St. Unfortunately, TPH as gasoline and diesel were not analyzed in any of the wells. We had agreed to this during our meeting with Richard Zipp and Rich Hielt on 9/17/92, since we agreed to analyze groundwater as per the 5/16/91 "Work Plan" prepared by Harding Lawson Associates. Since the free product appears to be mostly gasoline with some diesel (learned as per a telephone conversation between myself and Dick Zipp today), it is important to determine the extent of dissolved gasoline and diesel. Therefore, you are directed to analyze all wells which do not contain free product for TPH as gasoline and diesel in future rounds of sampling beginning with the next quarterly sampling event.

The 12/12/92 Quarterly Report states that groundwater flow is to the north. Please submit a potentiometric surface map which plots out the various groundwater elevation points and contours, **within 14 days or by January 1, 1993.** Please include this map with future quarterly reports.

During our meeting of 9/17/92, we also agreed to submittal of a remediation workplan. During my telephone conversation with Richard Zipp on 11/13/92 and again today, he indicated that a pilot test for a soil vapor extraction system had been conducted, and that the results would be submitted within 2 or 3 weeks (from 11/13). Since I have not received any report, we request that the results from the VES pilot study be submitted to me **within 14 days or by January 1, 1993.** In addition, we request that the remediation workplan be submitted **within 30 days or by January 18, 1992.** This case is a high priority for our agency due to the abundance of free product present in groundwater.

George Carey
STID 3779
page 2 of 2
December 18, 1992

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Please submit a cover letter signed by a Nestle representative when you submit reports from your consultant.

All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; b) the State Water Resources Control Board LUFT Field Manual; and c) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. All reports and documents pertaining to this investigation should also be sent to:

Rich Hiett
San Francisco Bay Region
Regional Water Quality Control Board
2101 Webster St., Ste 500
Oakland CA 94612

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

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Richard Zipp, Park Environmental, 2140 Professional Dr.,
Suite 130, Roseville CA 95661
Rich Hiett, RWQCB
Ed Howell/File

je

ALAMEDA COUNTY
HEALTH CARE SERVICES

21 June 1991 AGENCY
DAVID J. KEARS, Agency Director



R018

Carnation
800 North Brand Boulevard
Glendale, CA 91203
Attn: Richard Flaget
Environmental Engineer

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

Subject: Review of the work plan submitted for the Carnation facility at 1310 14th Street, Oakland.

Dear Mr. Flaget:

This agency has reviewed the work plan prepared by Harding Lawson Associates for the project listed above, dated 16 May 1991. Approval is granted for the implementation of further investigative actions as described in the plan.

This agency and the Regional Water Quality Control Board share concerns that the floating product reported to be underlying this site is not being addressed in a timely manner. We hope that the additional characterization data derived from the proposed study will facilitate the pumping of this material.

A review of our records indicates that the account balance deposit for this project has been exhausted. This deposit is authorized by Section 3-141.6 of the Ordinance Code of the County of Alameda and is used to offset the costs incurred by County employees in the pursuit of their oversight responsibilities. A record is maintained of the time committed by County employees to a project and the deposit is docked at an hourly rate. Upon completion of the project the balance of the deposit account is refunded. In the absence of deposit account funds, County employees can not review reports or provide other oversight services. Please submit a check payable to Alameda County for the amount of \$2,000.00 to address this issue. If you can write Project #346B on the check it will expedite processing.

If you have any questions concerning this matter please feel free to contact me at (415) 271-4320.

Sincerely,


Dennis J. Byrne
Senior Hazardous Materials Specialist

cc: Lester Feldman, SFBRWQCB
Rafat Shahid, Assistant Director, Alameda County Department
of Environmental Health.
R. Bruce Scheibach, Harding Lawson Associates

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R018

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

Certified Mailer #: P 367 604 379

May 8, 1991

Mr. Merle Wood, Senior Attorney
Carnation Corporate Offices
800 North Brand Blvd.
Glendale, California 91203

Subject: **Remediation of Free Product at the Carnation Property
located at 1310 14th Street in Oakland, California 94607**

Dear Mr. Wood:

This is to confirm our agreement for Carnation's handling of free product at the above site. As you are aware, we reached this agreement in the May 6, 1991 meeting at the Alameda County Hazardous Materials Division. This meeting was attended by Messrs. Bruce Scheibach and Daniel Craig of HLA, by Messrs. James Person and Richard Flaget of Carnation, by yourself, and by me.

In this meeting, HLA presented a contour map of free product measured at the Carnation site in April 1991. The map showed up to 5 feet of free product are present on site. Despite this information, free product characterization was addressed only in a minor fashion in the workplan presented at the meeting. Development of a free product remediation plan was not addressed in the plan at all. Therefore, we agreed that HLA would revise their workplan to address characterization of, and development of a remediation plan for, the free product at the site. This workplan must be submitted to our office by May 20, 1991.

The free product characterization is to include pumping and redevelopment of site wells and product recovery points to ensure sufficient entry of free product for accurate measurement, and determination and monitoring of the free product thickness and extent.

Because HLA believes free product to be contained by a building foundation and therefore to not be migrating, and because free product has not been detected off-site to date, we will not require the immediate initiation of free product remediation at this time. However, the workplan shall present a contingency plan for free product removal/control. This contingency plan must be implemented immediately in the event free product is found to be migrating or is detected off-site.

Page 2 of 2
Mr. Merle Wood
1310 14th Street
May 8, 1991

The workplan shall address the development of a free product remediation plan. We are requiring this remediation plan to be submitted by July 15, 1991. We require remediation plan implementation to be started and free product removal to be underway by September 1, 1991. Any extensions of these deadlines must be confirmed in writing by either this Division or the San Francisco Bay Regional Water Quality Control Board (SFRWQCB).

Following our meeting on May 6, 1991, I spoke with Lester Feldman of the SFRWQCB. He confirmed that the SFRWQCB's highest priority is remediation of free product and that the SFRWQCB's position is that free product must be removed in the shortest period of time. Mr. Feldman stated that insufficient efforts to remediate free product would subject a responsible party to enforcement actions and possible civil liability penalties.

Should you have any questions or need to discuss the above requirements, please feel free to contact me at (415) 271-4320.

Sincerely,



Katherine A. Chesick,
Senior Hazardous Materials Specialist

KAC:kac

cc: Jim Person, Director of Environmental Affairs, Carnation,
Glendale, CA
Bruce Scheibach, Harding Lawson Associates
Lester Feldman, San Francisco Bay Regional Water Quality
Control Board
Howard Hatayama, State Department of Health Services
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Rafat A. Shahid, Director, Alameda County Environmental Health
Department
Files

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R018

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

(5)

August 28, 1989

Byron T. Hobbs, Vice President
SOTA Environmental Technology, Inc.
16980 Via Tazon, Suite 130
San Diego, CA 92127

Dear Mr. Hobbs:

As requested, a file search has been conducted for the area of one mile radius with 1970 Broadway Oakland being the center. The area was defined as being between 2nd and 34th Streets, North and South, and between Lakeshore Ave. and Adeline St., East and West on a Thomas Bros Map. Our files were reviewed for reported releases of hazardous materials or waste. This included any emergency response, underground tank release report or Prop. 65 report made to this Department.

The following reports were made to this department:

	07/02/87	601 Webster St.	Tear Gas
(R0151)	04/08/87	1700 Jefferson	Tank Release Gasoline
(R0463)	06/22/87	2528 Adeline	Tank Release 160ppm TPH in soil
(R0341?)	02/19/87	4th and Broadway	Tank Removal 25 gal. fuel oil
	03/10/87	1221 Broadway	Tank Release fuel oil
	12/13/88	13th & Franklin	Tank Release 29 gal. gasoline
	12/07/88	30 Bay Place	Tank Release waste oil
	06/25/88	774 West Grand	Tank Release gasoline
	03/22/88	39 - 4th St.	10 gal. fixer/devel. spilled
	03/21/88	Grand & Harrison	spilled white foaming liquid into Lake Merritt
	06/09/88	11th and Webster	EDB found at construction site
	01/21/88	515 Bay St.	Tank Release gasoline
	03/02/89	1764 - 13th St.	Tank Release diesel
(R0391)	03/02/89	600 Fallon St.	Tank Release diesel pipe leak
	03/02/89	500 Grand Ave.	Tank Release gasoline in monitoring well
(R0358)	03/02/89	2225 Telegraph	Tank Release product in monitoring well
(R018)	01/24/89	1310 - 14th St.	Tank Release gasoline/diesel
	02/13/89	600 Fallon St.	Tank Release diesel
(R0385)	03/14/89	404 Market	Spill petroleum naptha
	02/14/89	1769 - 13th St.	Tank Release gas/diesel/waste oil
(R01064)	04/03/89	255 - 27th St.	Spill 110 gals. hazardous liquid
(R09)	04/21/89	2800 Telegraph	Tank Release gasoline
(R01139)	04/21/89	822 Alice	Tank Release diesel

Byron T. Hobbs, Vice President
SOTA Environmental Technology, Inc.
16980 Via Tazon, Suite 130
San Diego, CA 92127
Page 2 of 2
August 28, 1989

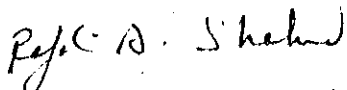
(R01082) 06/20/89	365 Hawthorne	Tank Release heating fuel
(R01033) 06/30/89	2735 Broadway	Tank Release waste oil
(R0954) 07/19/89	1 City Hall Plaza	Tank Release gasoline
(R01596) 08/11/89	2576 MLK, Jr. Way	Tank Release waste oil
(R0446) 08/21/89	330 Chestnut	Tank Release 75 ppm O&G in soil

This is limited to information available to this office and does not include any information available to other agencies or businesses which may be involved with these properties.

Please find enclosed, a copy of our invoice sent to our Billing Unit.

If you have any questions, please call Edgar Howell, Supv. Hazardous Materials Specialist at (415) 217-4320.

Sincerely,



Rafat A. Shahid, Chief
Hazardous Materials Program

RAS:mnc

cc: Edgar Howell, Alameda County Hazardous Materials
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R018

Certified Mailer #: P 833 981 375

April 25, 1989

Mr. Howard Shmuckler, Attorney
Carnation Corporate Offices
5045 Wilshire Blvd.
Los Angeles, California 90036

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415) 271-4320

Subject: Monitoring of Existing Underground Storage Tanks at the
Carnation Dairy Facility, 1310 14th Street in Oakland,
California 94607

Dear Mr. Shmuckler:

We have reviewed the Work Plan for Site Characterization of Boiler Fuel Tanks at the Carnation Dairy Facility in Oakland, prepared by Anania Geologic Engineering and dated March 27, 1989. This plan calls for the use of Monitoring Alternative 4 (California Code of Regulations, Title 23, Section 2641 (c)(4)) to monitor the two underground storage tanks containing boiler fuel #5. Monitoring Alternative 4 entails installation of groundwater monitoring wells, analysis of soil samples collected during well installation, and monthly sampling and analysis of groundwater from each well for the lifetime of the tanks.

After considering this case and consulting with the Regional Water Quality Control Board (RWQCB) and the State Water Resources Control Board (SWRCB), we have decided not to allow the use of Monitoring Alternative 4 for the following reasons:

- 1) Conversations with Dyan Whyte of the RWQCB and Terry Brazell of the SWRCB on April 5, 1989 have revealed that groundwater in the Bay Area is viewed as having beneficial uses and that Monitoring Alternative 4 therefore is not a monitoring option for underground tanks in the San Francisco Bay Region.
- 2) We are not certain that any boiler fuel #5 which might leak from the tanks would flow freely into a monitoring well and be detected.

Please note that if documentation is submitted which proves that boiler fuel #5 flows freely into groundwater monitoring wells, we would use it to reevaluate our position concerning the use of Monitoring Alternative 4.

Please select a different monitoring alternative and inform us of your choice. We are aware that most of the other alternatives

Page 2 of 2
Mr. Howard Shmuckler
Carnation
April 25, 1989

involve tank testing - which is at best problematic for large tanks containing oil as viscous as fuel oil #5 and at worst inaccurate. We therefore suggest replacement of the existing tanks with double walled tanks meeting Title 23 requirements.

We realize the difficulty of this situation and wish to be as helpful as possible. Should you have any questions or need information, please feel free to contact Katherine Chesick, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,

Rafat A. Shahid

Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:kac

cc: Jim Person, Corporate Director of Environmental Affairs,
Carnation, Los Angeles
Karl Anania, Anania Geologic Engineering
Don Dalke, Regional Water Quality Control Board
Howard Hatayama, State Department of Health
Services
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Katherine Chesick, Alameda County Hazardous Materials Division
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R018

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415) 271-4320

Certified Mailer #: P 833 981 377

March 28, 1989

Mr. Howard Shmuckler, Attorney
Carnation Corporate Offices
5045 Wilshire Blvd.
Los Angeles, California 90036

Subject: Response to Questions posed by Anania Geologic Engineering concerning remediation at the Carnation Dairy Facility, 1310 14th Street in Oakland, California 94607

Dear Mr. Shmuckler:

During a site visit to Carnation's Oakland Facility conducted by Katherine Chesick, Hazardous Materials Specialist, on March 17, 1989, Anania Geologic Engineering (AGE) posed several questions concerning several aspects of remediation. This letter serves to answer these questions, request additional information and request additional deposit money.

- 1) The Regional Water Quality Control Board (RWQCB) has indicated borings on site may extend to 50 feet provided a clay layer is not penetrated.
- 2) Per the RWQCB Water Quality Control (Basin) Plan, no specific clean up levels have been established for surfactants or animal fats in (on) the ground water; thus the target cleanup levels would be background levels.
- 3) Both Method 503 D and Method 503 E (oil and grease) must be used to analyze soil potentially contaminated with waste oil. It is our understanding that these methods do not duplicate results obtained from "TPH" analyses (total petroleum hydrocarbons, Department of Health Services Method, gasoline and diesel standards for low and high boiling point petroleum hydrocarbons); the TPH analyses will not reliably detect petroleum hydrocarbons having boiling points greater than or equal to waste motor oil. Please note that groundwater potentially contaminated with waste oil must be analyzed for oil and grease by methods 503 A and 503 E.
- 4) Submit to our office and to the RWQCB complete information on the use of, quantities of, and processes involving bacteria, nutrients, gases (used for bioremediation of fuel, fat and surfactants), chemicals, etc. being put down the Carnation facility wells. A RWQCB permit may be required for this bioremediation.

Page 2 of 2
Mr. Howard Shmuckler
Carnation
March 28, 1989

5) Please submit an additional \$700, payable to Alameda County, to cover our costs for work on this case.

Should you have any questions, please contact Katherine Chesick, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,

Rafat A. Shahid
Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:kac

cc: Jim Person, Corporate Director of Environmental Affairs,
Carnation, Los Angeles
Karl Anania, Anania Geologic Engineering
Don Dalke, Regional Water Quality Control Board
Howard Hatayama, State Department of Health
Services
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Katherine Chesick, Alameda County Hazardous Materials Division
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

DAVID J. KEARS, AGENCY
XXXXXXXXXXXXX
CARL N. LESTER, Agency Director



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

RO18

Certified Mailer #: P 833 981 192

March 6, 1989

Mr. Howard Shmuckler, Attorney
Carnation Corporate Offices
5045 Wilshire Blvd.
Los Angeles, California 90036

~~AGENCY HEADQUARTERS~~
~~XXXXXXXXXX~~
~~XXXXXXXXXXXXX~~
(415) 271-4320

Subject: Review of Site Characterization Work Plan For Excavated
Fuel Tank Area, Carnation's Dairy Facility, 1310 14th
Street in Oakland, California 94607

Dear Mr. Shmuckler:

We have received and reviewed the Site Characterization Work Plan
For Excavated Fuel Tank Area dated February 13, 1989 and prepared
by Anania Geologic Engineering for Carnation's Oakland Facility
located at 1310 14th Street. This work plan is acceptable to us
and may be carried out provided the following items are observed:

- 1) Contact the Oakland Fire Department and ensure the on-site
recovered free product containment system meets with their
approval;
- 2) Inform our office of field work and sampling activity schedules
so that we may conduct field inspections if necessary;
- 3) Construct all wells to permit entrance of free product into the
well;
- 4) Continuously core sample at least one well west of the former
tank location to provide accurate stratigraphic information.
Collection of undisturbed soil samples more frequently than every
five feet is strongly recommended during installation of wells at a
rate of one well per several or batch of wells;
- 5) Conduct total petroleum hydrocarbon (TPH) analyses for low and
high boilers (gasoline and diesel standards);
- 6) Perform oil and grease analyses by Method 503 D and E, per the
Regional Water Quality Control Board guidelines;
- 7) Note that Precision Analytical Laboratory is not certified to
perform EPA Methods 8240 and 8270;
- 8) Measure free product and water level thickness monthly, at a
minimum, for the first three months wells are sampled. For each
sampling event, collect free product and water level measurements
from all wells before any wells are purged and sampled;

Page 2 of 2
Mr. Howard Shmuckler
Carnation
March 6, 1989

9) Review/revise the Site Safety Plan as needed per the following concerns:

- use of half face respirator in atmospheres containing up to 1,000 ppm hexane equivalent organic vapors (this may exceed the half face respirator protection factor and will not provide any eye protection, if needed).
- frequency of air monitoring during site activities (none is mentioned).
- attach map or directions to the nearest emergency hospital (the map was omitted).

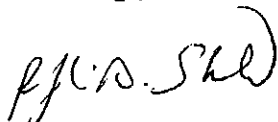
and

10) Submit the first report on activities conducted as part of this work plan within 45 days of onset of the proposed work.

We appreciate the thoroughness and responsiveness with which your consultant has addressed the remediation at the Oakland Carnation facility. The contamination at Carnation is unusually significant and complex; we therefore look forward to working with you as you continue your prompt handling of site cleanup.

Should you have any questions concerning this letter, please contact Katherine Chesick, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,



Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:kac

cc: Jim Person, Corporate Director of Environmental Affairs,
Carnation, Los Angeles
Karl Anania, Anania Geologic Engineering
Don Dalke, Regional Water Quality Control Board
Howard Hatayama, State Department of Health
Services
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Katherine Chesick, Alameda County Hazardous Materials Division
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



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

R018

Telephone Number: (415) 271-4320

Certified Mailer #: P 833 981 169

February 1, 1989

Mr. Howard Shmuckler, Attorney
Carnation Corporate Offices
5045 Wilshire Blvd.
Los Angeles, California 90036

Subject: Underground Storage Tank Leak Remediation at Carnation,
1310 14th Street in Oakland, California 94607

Dear Mr. Shmuckler:

Two members of our staff, Larry Seto, Senior Hazardous Materials Specialist, and Katherine Chesick, Hazardous Materials Specialist, witnessed the removal of five underground storage tanks from the Carnation facility located at 1310 14th Street in Oakland in January 1989. Free product, presumably diesel fuel and possibly gasoline, was observed floating on the groundwater in the excavation pit from which two diesel and two gasoline tanks were pulled; strong gasoline odors emanated from the waste oil tank pit. Biodegradable surfactants which hold fuels in suspension were later detected in the groundwater. The extent of this contamination must be assessed and remediated.

Our office will be the lead agency overseeing the remediation of this site. We will be working with the Regional Water Quality Control Board (RWQCB) to ensure that their remediation requirements are met. Per our discussions with the RWQCB, we require that you submit a work plan which, at a minimum, addresses the items listed below. All work must be performed according to the Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks, 2 June 1988 (hereafter referred to as "2 June 1988 RWQCB document").

- 1) Immediate initiation of free product removal.
- 2) Site history. This shall include historic site use and

Page 2 of 6
Mr. Howard Shmuckler
Carnation
February 1, 1989

ownership information, a description of the types and locations of any hazardous materials used on site and the installation and use history (installation and use dates, types of materials contained) of all the underground tanks used on site.

3) Determination of the vertical and lateral extent of soil contamination (see the LUFT manual for details concerning soil sampling). Soil contamination related to the diesel, gasoline and waste oil tanks and their associated piping must be addressed.

a) During drilling of all boreholes and monitoring wells, undisturbed soil samples are to be collected at a minimum of every five feet in the unsaturated zone and at any changes in lithology; and

b) Soil samples are to be analyzed by a California State Certified Laboratory for the appropriate constituents (see Table 2, 2 June 1988 RWQCB document, attached).

4) Definition of the horizontal and vertical extent of the ground water pollution plume. The extent of the free product plume and the extent of dissolved product plumes must be addressed.

a) A minimum of one monitoring well must be installed within 10 feet of the tank in the verified downgradient direction (see also the LUFT manual for details concerning monitoring well construction);

b) Monitoring and extraction wells should be designed and constructed to be consistent with the LUFT manual and to permit entrance of free product into the wells;

c) Wells shall be surveyed to mean sea level;

d) All monitoring wells shall be sampled monthly for free product and dissolved constituents for the first three months following well installation. After three months of consecutive sampling, sampling may be conducted as needed for remediation purposes but must occur at least quarterly. Before each sampling event is begun, free product thicknesses and water levels shall be measured in all wells. Floating product measurements shall be performed using an optical probe or other device of equal accuracy; and

e) Ground water samples are to be analyzed by a California

Page 3 of 6
Mr. Howard Shmuckler
Carnation
February 1, 1989

State Certified Laboratory for the appropriate constituents (see Table 2, 2 June 1988 RWQCB document, attached).

5) Interpretation of hydrogeologic data. Water level contour maps, ground water gradient determinations, and free and dissolved product definition maps should be routinely prepared and submitted with analytical data from each sampling event; fluctuations in groundwater levels due to tidal action should also be documented. Geologic cross-sections should be prepared as specified in Attachment 2 using appropriate boring logs. The geologic characteristics of the aquifer must be described. The cross sections, ground water gradients (horizontal and vertical), and tidal effects should be interpreted to explain pollution migration patterns.

6) Determination of the potential short- and long- term impacts of the pollution plume on the beneficial uses of ground and surface water in the area. Beneficial uses include municipal water supply, ground water recharge, fresh water habitat, wildlife habitat, contact and non contact recreation, and fish migration

7) Development of a remediation plan. This plan is to include a time schedule for plan implementation and, at a minimum, must address the following:

a) Expedient removal of all free product by an appropriate remediation system. Specific information on the system must be submitted. Manual bailing of fuel product is not acceptable as a recovery system, nor is a system which increases soil contamination (a free product removal system which creates a cone of depression could increase soil contamination). Actual amounts of free product removed must be monitored and tabulated;

b) Remediation of contaminated soil. Soil contaminated with 1000 ppm or greater total petroleum hydrocarbons must be remediated. Soil having hydrocarbon levels between 100 and 1000 ppm must be either remediated or, if sufficient evidence is provided which indicates no adverse effects on groundwater will occur, left as is with implementation of a groundwater monitoring program. Cleanup of soils to less than 100 ppm is strongly recommended in order to minimize the impact of residual soil contamination on ground water quality; and

c) Remediation of any dissolved constituents.

Page 4 of 6
Mr. Howard Shmuckler
Carnation
February 1, 1989

Contaminated ground water must be remediated such that beneficial uses of the ground and surface water are restored and/or protected as required by RWQCB's "Policy with Respect to Maintaining High Quality of Waters in California".

The remediation plan shall evaluate mitigation alternatives. The design of remedial action systems should be based on appropriate review of hydrogeologic and water quality data. Aquifer test data (pump- and/or slug-testing) should be used to determine aquifer characteristics and the probable capture zone(s) of extraction system(s). The overall effectiveness of the remediation system should be verified by an appropriate monitoring program.

Mitigation involving on-site treatment of hazardous wastes requires a variance from the State of California Department of Health Services (DHS). Such a variance may be applied for at either the DHS regional office in Emeryville (Permitting Section) or the DHS office in Sacramento (Alternative Technology Section).

Please submit this work plan within 30 days of receipt of this letter. Implementation of remedial plans for free product, polluted soils and dissolved constituents may be appropriate prior to full definition of the extent of pollution.

Reports documenting implementation of the above work plan must contain:

- * Actions that have occurred since the last report
- * Actions planned to occur
- * Water level records
- * Clear records of field observations
- * Chain-of-custody forms
- * Laboratory-originated analytical results for all samples collected since the last report
- * Water level contour maps
- * Gradient determinations
- * Status of free product remediation (i.e. amount removed, both episodic and continuous)
- * Status of free product plume definition (tabulated and presented as plume maps)
- * Status of soil remediation
- * Status of soil contamination definition (tabulated and presented as cross-sections)

Page 5 of 6
Mr. Howard Shmuckler
Carnation
February 1, 1989

- * Status of dissolved constituent remediation (e.g. estimated starting date, daily flow records, and evaluation of remediation system performance)
- * Status of dissolved constituent plume definition (tabulated and presented as plume maps for each constituent)
- * Copies of TSDF to Generator manifests for any hazardous wastes hauled off site

We wish to draw your attention to the following requirements set forth in the 2 June 1988 RWQCB document, page 2:

All work and reports which require geologic or engineering evaluations and/or judgements must be performed under the direction of an appropriately registered or certified professional (See sections 6735, 7835, and 7835.1 of the Business and Professions Code). Also Rule 415 of the Professional and Vocational Regulations is to be followed. This rules states:

A professional engineer...registered or licensed under this Code shall practice and perform engineering...work only in the field or fields in which he is by education and/or experience fully competent and proficient.

A statement of qualifications for each lead professional should be included in all reports. Initial tank removal and soil sampling does not require such expertise; however, borehole and monitoring well installation and logging, and impact assessments do require such a professional.

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and to:

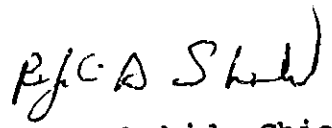
Don Dalke
Toxics Cleanup, Underground Tank Section
Regional Water Quality Control Board
1111 Jackson Street
Oakland, California 94607
(415) 464-1255

To cover our costs for remediation review, please submit a check, payable to Alameda County, for \$600.

Page 6 of 6
Mr. Howard Shmuckler
Carnation
February 1, 1989

Should you have any questions concerning this letter, please contact Katherine Chesick, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,



Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:kac

cc w/ attachments:

- Jim Person, Corporate Director of Environmental Affairs,
Carnation, Los Angeles
- Geno DiMaggio, Operator, Carnation, 1310 14th Street, Oakland
- Karl Anania, Anania Geologic Engineering
- Don Dalke, Regional Water Quality Control Board
- Dwight Hoenig, State Department of Health
Services
- Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
- Katherine Chesick, Alameda County Hazardous Materials Division
Files