

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

June 10, 1994  
STID# 1667

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

Ms. Kimberly Brandt  
Catellus Development Corp.  
201 Mission Street, 30th Floor  
San Francisco, California 94105

**RE: Investigation / Remediation at the  
Yerba Buena Project Site, Emeryville, California 94608**

Dear Ms. Brandt:

The Alameda County, Department of Environmental Health, Hazardous Materials Division has completed review of the reports prepared and submitted to date by Levine Fricke for the referenced site. In addition, our staff toxicologist, Dr. Ravi Arulanantham, has reviewed the Baseline Health Risk Assessment for Area C prepared and submitted by Soma Environmental Engineering, Inc.

As you are aware, the Yerba Buena Project Site is divided into four designated areas; Area A, Area B, Area C and Area D. The cleanup goals proposed by Catellus for the site were as follows: 10 ppm TPH gasoline, 100 ppm TPH diesel, 1000 ppm oil and grease, and 1 ppm combined concentration of benzene, toluene, ethylbenzene, and xylene. In 1991, the Regional Water Quality Control Board and this agency concurred with the above mentioned site cleanup goals with the following conditions;

- 1) implementation of an acceptable containment plan for petroleum hydrocarbon affected soils which should include specific guidance language providing for the maintenance of the proposed encapsulations to protect water quality
- 2) implementation of an acceptable soil management plan such that any future activity at site which requires excavation of contaminated soil will be managed to mitigate any water quality problems which could arise
- 3) a notice to be placed on the recorded deed(s) whenever soils containing elevated levels of pollutants are contained on any affected parcel
- 4) a long term monitoring program to evaluate the remaining risks posed by the residual soil and groundwater contamination left in place

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RE: Yerba Buena Project Site, Emeryville, California  
June 10, 1994  
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This office has the following comments concerning the status of the investigation / remediation for the different subject areas:

**AREA A:**

Two underground storage tanks (1500 gallon and 2000 gallon containing heating fuel oil) were removed in October 1, 1993. The former tanks (located southeast of the intersection of Yerba Buena Avenue and Hollis Street) were uncovered during grading work at the site. Soil samples collected following the removal of the tanks showed 470 ppm TPH diesel, 3800 ppm TOG, 960 ppm TPH motor oil, 0.013 ppm benzene, 0.013 ppm ethyl benzene, 0.055 ppm xylene and non detect (nd) for toluene. Overexcavation of contaminated soil (approx. 2500 cubic yards) was conducted and verification soil samples collected found 110 ppm TPH diesel, 430 ppm TOG, 170 ppm TPH motor oil, 0.007 ppm xylene, nd benzene, nd ethyl benzene, and nd toluene. The residual soil contamination left in place is within the clean up goals developed for the site with the exception of soil sample BS-14, collected at 14 feet bgs showing TPH diesel 10 ppm over the clean up goal).

It appears that adequate source removal of contaminated soil related to the two former tanks has occurred at the site. However, the threat to human health and groundwater posed by the residual soil contamination left in place must be evaluated. This issue should be addressed in the soil containment and management plan. Groundwater investigation related to the release associated with the two former tanks must be incorporated in the long term monitoring program.

In addition, volatile organic compounds had been detected in this area. A workplan for the installation of a groundwater extraction and treatment system had been approved by this office to hydraulically contain and extract shallow groundwater affected by the volatile organic compounds. To prepare the site for development, monitoring wells were abandoned and replacement wells will be installed following completion of site development.

**AREA B:**

One underground storage tank (approximately 350 gallon capacity) was removed in October 27, 1993. The former tank (located southeast of 40th and Hollis streets centerline) was uncovered during installation of underground utilities at the site. Soil sample collected following the removal of the tanks showed the

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following analytical results for petroleum hydrocarbons: 77 ppm oil and grease (O&G); non detect for TPH gasoline, TPH diesel, TPH motor oil, benzene, toluene, ethyl benzene, and xylene. VOC's were non detect with the exception of chloroform (0.0016 ppm) and methylene chloride (0.37 ppm). Overexcavation of soil suspected of containing petroleum hydrocarbons (based on PID readings and olfactory observation ) was conducted and verification soil samples collected found 67 ppm O&G and non detect for TPH gasoline, TPH diesel, TPH motor oil and BTEX.

It appears that adequate source removal of contaminated soil related to the former tank has occurred at the site. Therefore, no further work will be required with regards to the former 350 gallon tank.

#### Former Ransome Company

On January 1990, five underground storage tanks were removed at the former Ransome Company site ( 2 - 4000 gallon diesel, 1 - 250 gallon waste oil, 1 - 1000 gallon gasoline, 1 - 10,000 gallon gasoline ). Soil samples collected following the removal of the tanks showed the following petroleum hydrocarbon results: 740 ppm TPH gasoline, 7500 ppm TPH diesel, 1100 ppm TOG, 1.3 ppm benzene, 0.25 ppm toluene, 11.4 ppm xylene and 4.7 ppm ethyl benzene. Pipeline soil samples were collected and found the following petroleum hydrocarbon concentrations: 7400 ppm TPH gasoline, 4900 ppm TPH diesel, 32 ppm benzene, 150 ppm toluene, 371 ppm of xylene, 92ppm ethyl benzene. Approximately 25,000 cubic yards of contaminated soils were excavated and will be contained on site in accordance to the Containment Plan prepared by Levine Fricke dated March 10, 1992. Final verification samples showed that the residual soil contamination left in placed is within the clean up goals developed for the site with the exception of three samples collected at ten feet depth : SW-38 (45 ppm TPH gasoline, 0.70 ppm benzene, 6.6 ppm ethylbenzene, 14 ppm xylene); SW-41 ( 90 ppm TPH gasoline, 0.63 ppm benzene, 4 ppm ethylbenzene, 10 ppm xylene); SW-42 (70 ppm TPH gasoline, 0.08 ppm benzene, 2.4 ppm ethylbenzene, 13 ppm xylene). Three monitoring wells (W-1, W-2, and W-3) were installed by Aqua Resources Inc. (ARI) in November 1990 and subsequently destroyed during soil remediation activities. A groundwater investigation was conducted by Levine Fricke in May 1992 and seven monitoring wells (LF-16, LF-24, LF-25, LF-26, LF-27, LF-28 and LF-29) were installed at the site. Groundwater samples detected 0.4 ppb benzene, nd TPH gasoline, 0.4 ppb toluene, nd ethylbenzene, 2 ppb xylene, 980 ppb TPH diesel and 5600 ppb TOG.

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It appears that adequate source removal of contaminated soil related to the five former tanks has occurred at the site. However, the threat to human health and groundwater posed by the residual soil contamination left in place must be evaluated and addressed in the soil containment and management plan.

Additionally, the groundwater investigation related to the releases associated with the five underground storage tanks must be incorporated in the long term monitoring program.

#### **AREA C:**

##### **Former Bashland Property**

Three underground storage tanks ( 2 -12,000 gallon diesel tanks, 1 - 1200 gallon oil tank) were removed in April 1992. Total oil and grease as high as 1500 ppm was detected in the soil sample collected at 8 feet bgs following the removal of the former tanks. A groundwater sample from the excavation pit showed 1200 ppb TPH diesel, 22 ppb trichloroethene, and 8 ppb 1,2 dichloroethene. One monitoring well (LF-31) located downgradient of the former tanks was installed in February 1993. During the recent monitoring event (3/11/94), the groundwater sample from this well detected 110 ppb TPH diesel, 210 ppb TPH oil, 6 ppb TCE, 3.4 ppb 1,2-DCE.

Two hydraulic lifts, an oil/water separator, and a concrete inspection pit were removed from the site in February 1993. Soil samples (SW2-7 & WS-6) collected at 6 feet to 7 feet bgs showed 3600 ppm TPH diesel and 2600 ppm O&G. Overexcavation was conducted and final verification soil samples collected at 10.5 feet to 13 feet bgs from the former hydraulic lift area detected 1600 ppm O&G and 1500 ppm TRPH.

It appears that adequate source removal of contaminated soil related to the former three tanks and two hydraulic lifts had occurred at the site. However, the threat to human health and groundwater posed by the residual soil contamination left in place must be evaluated and addressed in the soil containment and management plan.

Additionally, the groundwater investigation related to the releases associated with the former tanks and hydraulic lifts must be incorporated in the long term monitoring program.

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#### Former Bay Area Warehouse (BAW)

On November 1991, a 2000 gallon gasoline tank was removed from the former BAW site. Soil samples collected following the removal of the tank showed 3ppm TPH gasoline and non detect for benzene. Lead was detected at 146 ppm. A groundwater collected from the excavation found 8800 ppb TPH gasoline, 240 ppb benzene, 360 ppb toluene, 170 ppm ethylbenzene, 750 ppb xylene and nd Pb. One monitoring well (LF-32) was installed in the downgradient location of the former tank. Initial groundwater sample collected on May, 1993 showed nondetectable concentration of TPH gasoline, BTEX and organic lead. However, TPH diesel was found at 440 ppb. The recent sampling event (March 1994) showed 110 ppb TPH gasoline, 890 ppb TPH diesel, 850 ppb TPH motor oil, 2.5 ppb TCE, 0.8 ppb 1,2-DCE and nd BTEX.

The groundwater monitoring related to the former gasoline tank must be continued and incorporated in the long term monitoring program.

#### Beach Street Area

Two 12,000 gallon underground storage tanks (uncovered during excavation of petroleum hydrocarbon contaminated soil) were removed in August 31, 1993. Soil samples collected beneath the tank excavation detected levels of petroleum hydrocarbon up to 200 ppm TPH diesel, 2200 ppm oil and grease, 540 ppm TPH motor oil and 31 ppm TPH gasoline. Overexcavation of contaminated soil was conducted in September, 1993 and final verification samples collected at 5 feet and 10 feet bgs showed 750 ppm TPH diesel, 4100 ppm oil and grease, 1400 ppm TPH motor oil, 100 ppm TPH gasoline, 0.14 ppm toluene, 1.7 ppm ethylbenzene, 5.6 ppm xylene.

A soil and groundwater investigation to determine the vertical and lateral extent of contamination resulting from the former leaking tanks was required by this agency. A work plan dated March 31, 1994 to install one monitoring well and two soil borings was prepared and submitted by Levine Fricke. The workplan is acceptable provided the following modifications are addressed:

- during borehole advancement, one of the soil samples to be collected must be from the soil/water interface and the sample must be analyzed by a state certified laboratory for VOC's and metals (Pb, Zn, Ni, Cr, Cd) in addition to TPH gasoline, TPH diesel, TPH motor oil and BTEX.
- initial groundwater samples must be analyzed for VOC's and metals (Pb, Zn, Ni, Cr, Cd) in addition to TPH gasoline, TPH

Ms. Kimberly Brandt  
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diesel, TPH motor oil and BTEX. Quarterly groundwater samples should be analyzed for TPH diesel, TPH gasoline, TPH motor oil and BTEX.

The threat to human health and groundwater posed by the residual soil contamination left in place must be addressed in the soil containment and management plan.

In addition, the groundwater investigation related to the two former leaking tanks must be incorporated in the long term monitoring program.

#### **BASELINE HEALTH RISK ASSESSMENT FOR AREA C**

This office has reviewed the May 16, 1994 Baseline Health Risk Assessment for AREA C prepared and submitted on May 17, 1994 by SOMA Environmental Engineering, Inc. The HRA evaluated potential human health risks to construction workers and future retail workers associated with exposure to volatile organic compounds (VOC's) in subsurface soil and groundwater and priority pollutant metals found in Area C. The VOC contamination found in Area C appears to be originating from an off-site upgradient source located north of the referenced site.

We concur with the findings presented in the HRA that the proposed development of Area C as a retail shopping center under current site conditions will not pose a significant health risk to construction workers and future retail workers. The risk assessment was a very well prepared technical document which addressed all of the concerns of the County. Please be advised that a Site Health and Safety Plan should be prepared and submitted to this office prior to initiating construction in Area C. The Health and Safety Plan should address the following issues:

- potential hazards due to inhalation of VOCs from soil and groundwater
- potential hazards due to contact with contaminated soils
- mitigating measures to reduce worker exposure to chemicals of concern
- monitoring plan to measure worker exposure to pollutants

#### **Peralta Street & San Pablo Avenue**

One 1500 gallon heating fuel underground storage tank (located underneath the sidewalk near 3819 San Pablo Ave.) was removed in September 22, 1993 at the referenced area. Bottom soil samples collected at 10 feet bgs following removal of the tank found 120

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ppm oil & grease and non detect for TPH diesel, BTEX, TPH motor oil. Sidewall sample at 8 feet bgs showed 33 ppm oil & grease and non detect for TPH diesel, BTEX , TPH motor oil.

The residual soil contamination left in place are within the clean up goals for the site, however the impact to groundwater must be evaluated. The groundwater investigation related to the former heating fuel tank should be incorporated in the long term monitoring program.

Until clean up is complete, you will need to submit reports to this office **every three months** ( or at a more frequent interval, if specified at any time by this office). In addition, the following items must be incorporated in your future reports or workplans :

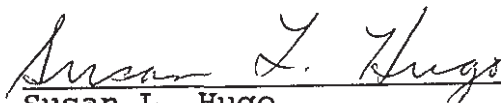
- a cover letter from the responsible party or tank owner stating the accuracy of the report and whether he/she concurs with the conclusions and recommendations in the report or workplan
- site map delineating contamination contours for soil and groundwater based on recent data should be included and the status of the investigation and cleanup must be identified
- proposed continuing or next phase of investigation / cleanup activities must be included to inform this department of the responsible party or tank owner's intention
- any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained
- historical records of groundwater level in each well must be tabulated to indicate the fluctuation in water levels
- tabulate analytical results from all previous sampling events; provide laboratory reports ( including quality control/quality assurance) and chain of custody documentation

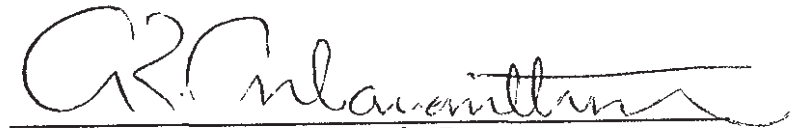
All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professional involved with the project.

Ms. Kimberly Brandt  
RE: Yerba Buena Project Site, Emeryville, California  
June 10, 1994  
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If you have any questions concerning this letter, please contact anyone of the undersigned at (510) 271-4530.

Sincerely,

  
\_\_\_\_\_  
Susan L. Hugo  
Senior Hazardous Materials Specialist

  
\_\_\_\_\_  
Ravi Arulanantham, Ph.D.  
Staff Toxicologist

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health  
Edgar B. Howell, Chief, Hazardous Materials Division / file  
Steven I. Morse, Division Chief, RWQCB-II  
Lester Feldman, RWQCB-II  
Sumadhu Arigala, RWQCB-II  
Jenifer Beatty / Ron Goloubow, Levine Fricke -  
1900 Powell St., 12th Floor Emeryville, CA 94608



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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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

August 4, 1993  
STID# 1667

Ms. Jenifer Beatty  
Levine Fricke  
1900 Powell Street, 12th Floor  
Emeryville, California 94608

**RE: Catellus - Yerba Buena Project , Emeryville**

Dear Ms. Beatty:

As per your request, this letter documents the verbal approval for abandoning and replacing of monitoring wells as discussed during our June 2, 1993 meeting.

This office concurs with the scope of work included in the " Work Plan for Site Characterization and Remediation Activities to be Conducted in Conjunction with the Proposed Site Development, Yerba Buena/East Baybridge Project Site" dated April 28, 1993 and prepared by Levine Fricke.

Also discussed during our meeting was the requirement of a Notice to be placed on the recorded deed(s) of affected parcel where soils with elevated levels of pollutants are contained. It is my understanding that Catellus is working on this issue.

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

Sincerely,

Handwritten signature of Susan L. Hugo in cursive script.

Susan L. Hugo  
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health  
Rich Hiatt, San Francisco Bay RWQCB  
Edgar B. Howell, Chief, Hazardous Materials Division / file  
Kimberly Brandt, Catellus Development Corporation  
201 Mission Street, Suite 202  
San Francisco, California 94105

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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

5 March 1991

Rick Notini  
Catellus Development Corporation  
201 Mission Street  
Suite 250  
San Francisco, CA 94105

Subject: Remedial Plan for the Yerba Buena Project in Oakland.

Dear Mr. Notini:

Thank you for the remedial plan, dated 11 February 1991, prepared by Levine-Fricke and submitted to this office. A review of this plan has been completed and approval is granted for implementation of the following components:

- \* The physical excavation of lead and zinc contaminated soils for disposal as hazardous waste.
- \* The physical excavation of PCB contaminated soil to a residue of no greater than one part per million.
- \* The installation of a French Drain along the west side of Hollis Street for the collection of ground water.
- \* The installation of additional ground water monitoring wells.

Approval of the proposed encapsulation of hydrocarbon contaminated soil as described in the remedial plan will be granted upon the completion of the fish bioassay study and submittal of this data for review.

29C

Rick Notini  
Catellus Development Corp.  
201 Mission Street  
Suite 250  
San Francisco, CA 94105  
Re. Yerba Buena Remedial Plan  
5 March 1991  
Page 2 of 2

The contents of this letter have been discussed with Amanda Spencer of Levine-Fricke. If you have any questions concerning this matter, please contact me at (415)271-4320.

Sincerely,

  
Dennis J. Byrne  
Senior Hazardous Materials Specialist

cc: Lester Feldman, SFBRWQCB  
Tom Gandesbery, SFBRWQCB  
Howard Hatayama, DOHS  
Rafat Shahid, Assistant Director, Alameda County Department  
of Environmental Health.  
Don Marini, Catellus Development Corp.  
Amanda Spencer, Levine-Fricke

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

4 February 1991

S. Kinear Smith  
Ransome Company  
P.O. Box 8506  
4030 Hollis Street  
Emeryville, CA 94662

Subject: Soil and Groundwater Investigation being conducted at the former Ransome Company site, 4030 Hollis Street, Emeryville.

Dear Mr. Smith:

Thank you for the report prepared by Aqua Resources Incorporated, dated 16 January, 1991, and submitted to this office for review. This agency is satisfied in the quality of the soil investigation conducted at this site and approval is granted for the excavation of contaminated regions of the property as proposed in the Aqua Resources report. Please ensure that verification samples are collected in each excavation zone to ensure that no hydrocarbon contamination in excess of 1,000 parts per million remains. The absence of this verification sampling will hinder a final closure of the project in accordance with guidelines established by the Regional Board.

In the Aqua Resources report various options for the treatment of contaminated soil are proposed. The options specified include:

The on-site aeration of gasoline contaminated soil.

The on-site bioremediation of diesel and oil contaminated soil.

The transport of diesel and oil contaminated soil to an off-site location for bioremediation treatment.

The off-site transport of contaminated soil for landfill disposal.

This agency has no objection to the pursuit of these four options, however, please be aware that the involvement of other regulatory agencies may be involved and that prior to this office granting approval for the implementation of a specific treatment process assurance will be required that all appropriate requirements of other agencies are being met.

25C

S. Kinnear Smith  
Ransome Company  
P.O. Box 8506  
4030 Hollis Street  
Emeryville, CA 94662  
Re. 4030 Hollis, Emeryville  
4 February 1991  
Page 2 of 3

The on-site aeration of gasoline contaminated soil may require the issuance of a permit from the Bay Area Air Quality Management District. Following the issuance of this permit or the granting of a waiver for the need for such a permit, approval for the implementation of this process will ensue.

The off-site transportation of contaminated soil for treatment at another location or landfill disposal will first require that this soil be characterized in accordance with § 66700 and § 66702 of Title 22 of the California Code of Regulations. Should this soil constitute hazardous waste, transport off-site will require adherence to the uniform hazardous waste manifest provisions of Title 13 of the CCR. An off-site location treating hazardous wastes must be licensed by the state as a hazardous waste treatment, storage and disposal facility.

If testing results determine that this soil constitutes hazardous waste, on-site treatment may proceed provided that a permit for the treatment is obtained from the Department of Health Services or that the Permit by Rule provisions of § 66392 of Title 22 of the CCR are strictly followed. If the soil constitutes non-hazardous waste than no such permit will be required for treatment. The specific classification of this soil must be completed prior to this agency granting approval for the implementation of a specific treatment proposal outlined in the Aqua Resources report.

Approval is granted for the installation of an additional groundwater monitoring well in the vicinity of the former fuel pump island. It is our understanding that this installation will take place following the completion of further soil excavation in this region.

As recommended in the Aqua Resources report, further groundwater monitoring is required at this site. Please be aware that further investigative actions may be required if a groundwater problem necessitating greater clarification is detected during this monitoring program. You can anticipate a minimum of one year of quarterly monitoring as being the minimum necessary to fulfill the requirements of the San Francisco Bay Regional Water Quality Control Board. The frequency of or need for further monitoring will be based upon the data derived during this first year.

S. Kinnear Smith  
Ransome Company  
P.O. Box 8506  
4030 Hollis Street  
Emeryville, CA 94662  
Re. 4030 Hollis Emeryville  
4 February 1991  
Page 3 of 3

If you have any questions concerning this matter or the steps which must now be taken, please contact me at (415)271-4320. The contents of this letter have been discussed with Mark Milani of Aqua Resources Incorporated.

Sincerely,



Dennis J. Byrne  
Senior Hazardous Materials Specialist

cc: Lester Feldman, SFBRWQCB  
Howard Hatayama, DOHS  
Rafat Shahid, Assistant Director, Alameda County Department of  
Environmental Health.  
Ric Notini, Catellus Development Corporation  
Mark Milani, Aqua Resources Inc.  
Amanda Spencer, Levine-Fricke

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



14 September 1990

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

S. Kinnear Smith  
Ransome Company  
P.O. Box 8506  
4030 Hollis Street  
Emeryville, CA 94662

Subject: 4030 Hollis Street, Emeryville.

Dear Mr. Smith:

Thank you for the amended work plan prepared by Aqua Resources Incorporated for the environmental investigation of the former Ransome Company site listed above. This proposal has been reviewed and approval is granted for it's implementation.

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

Sincerely,

Dennis G. Byrne  
Hazardous Materials Specialist

**20C**

cc: Lester Feldman, SFBRWQCB  
Rafat Shahid, Assistant Director, Alameda County Department of  
Environmental Health.  
Ric Notini, Catellus Development Corporation  
Mark Milani, Aqua Resources Inc.  
Amanda Spencer, Levine-Fricke

FILES

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



CALIFORNIA REGIONAL WATER

APR 19 1990

LF

QUALITY CONTROL BOARD

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

MISS

18 April 1990

Prem P. Chaudri  
Asset Manager  
Santa Fe Pacific Realty Corp.  
Suite 202  
201 Mission Street  
San Francisco, CA 94105

61

Ransone Corp

Subject: Underground Storage Tank Removal Project being conducted at 4030 Hollis Street, Emeryville.

Dear Mr. Chaudri:

This office has received and reviewed an analytical report and hazardous waste manifests submitted in regards to the underground storage tank removal project being conducted at the address listed above. The reported data indicate that further action is required to address the soil contamination identified.

The California Department of Health Services has designated 1,000 parts per million of petroleum hydrocarbon contamination in soil as constituting hazardous waste. Soil contaminated to such an extent must be physically removed for proper disposal

Guidelines established by the San Francisco Bay Regional Water Quality Control Board specify certain follow-up actions which must be initiated to address soil contamination associated with underground tank sites. Soil contaminated with petroleum hydrocarbons in excess of 10 parts per million cannot be placed back in the excavation pit unless first treated by a means sufficient to reduce the level of contamination to this value. Analytical documentation attesting to the success of the treatment process would have to be submitted for review prior to the approval for such a burial.

In addition, the measurement of soil petroleum hydrocarbon contamination exceeding 100 parts per million necessitates that a ground water investigation be initiated. The purpose of such a program would be to determine the gradient of ground water flow and to gauge if ground water quality has been impacted by the release of material from the underground tank. The guidelines specify that data from a minimum of three wells be used to define the gradient of ground water flow and that all boring logs and analytical data be submitted for review. Should ground water contamination be encountered it is then necessary to define the lateral extent of any contaminant plume by installing additional borings until the zero point can be identified. A minimum of two years of quarterly monitoring is required before a sign-off of the project can be anticipated.



Pram P. Chaudri  
Santa Fe Pacific Realty Corp.  
Suite 202  
201 Mission Street  
San Francisco, CA 94105  
Re. 4030 Hollis Street, Emeryville  
18 April 1990  
Page 2 of 2

In regards to the project at 4030 Hollis Street in Emeryville, soil contamination exceeding 1,000 parts per million was measured in both the waste oil and diesel tank pits. Hydrocarbon contamination exceeding 1,000 parts per million was also measured in some of the samples collected from piping trenches. These areas will require further excavation and the collection of verification samples to demonstrate that no hazardous waste remains on the site. Upon the completion of this task the ground water investigation described earlier will have to be initiated.

It has been communicated to this office that an in depth environmental assessment of this property is currently underway. It is possible that much of the information needed to gauge the extent of contamination associated with these underground storage tanks may already be available. If such an assessment is being developed than please notify this office as to a tentative date upon which this information will be available for review. Or submit a proposal specifying the actions which you intend to follow to fulfill the requirements of the Regional Board's Guidelines and a timetable for their implementation.

If you have any questions or require further clarification concerning actions which need to be taken to address this matter, please contact me at (415) 271-4320.

Sincerely,

  
Dennis J. Byrne  
Hazardous Materials Specialist

cc: Lester Feldman, SFBRWQCB  
Doug Krause, DOHS  
Rafat Shahid, Assistant Director, Alameda County Department of  
Environmental Health.  
S. Kinnear Smith, The Ransome Company  
Bob Schenker, Kennedy/Jenks/Chilton, Inc.

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



*Full*

DEPARTMENT OF ENVIRONMENTAL HEALTH  
470 - 27th Street, Third Floor  
Oakland, California 94612  
(415) 271-4320

May 23, 1988

Ransome Company  
4030 Hollis St.  
Emeryville, CA 94608  
Attn: Mark Smith

SUBJECT: UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK)/  
CONTAMINATION SITE REPORT

Dear Mr. Smith:

On February 19, 1988, our office received a report from Testing and Technology regarding failed underground storage tank tests at your facility.

The California Administrative Code, Title 23, requires all unauthorized releases to be reported. Section 2652(b) requires within five (5) working days of detecting the release, the operator or permittee shall submit to the local agency (Alameda County Hazardous Materials Division) a full written report to include all of the following information which is known at the time of filing the report:

1. List of type and quantity of hazardous substances released.
2. The results of all investigations completed at that time to determine the extent of soil or groundwater or surface water contamination due to the release.
3. Method of clean-up implemented to date, proposed clean-up actions, and approximate cost of actions taken to date.
4. Method and location of disposal of the released hazardous substance and any contaminated soils or groundwater or surface water (indicate whether a hazardous waste manifest(s) is utilized).

**2C**

Ransome Company  
UGT Unauthorized Release (Leak)/  
Contamination Site Report  
May 23, 1988  
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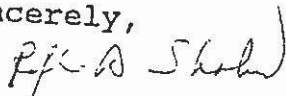
5. Proposed method of repair or replacement of the primary and secondary containers.
6. Facility operator's name and telephone number.

Until clean-up is complete, the operator or permittee shall submit reports to the County and the Regional Water Quality Control Board (RWQCB) every three (3) months or at a more frequent interval if specified by either agency. The reports shall include the information requested in 2, 3 and 4 of the above. The report requested above shall be prepared in accordance with the San Francisco Regional Water Quality Control Board's "Guidelines for Addressing Fuel Leaks," September 1985. The initial investigation report shall be submitted within 30 days and shall include a site safety plan.

Soils contaminated at hazardous waste concentrations shall be transported by a licensed hazardous hauler and disposed of or treated at a California Department of Health Services approved facility. Soils contaminated below hazardous waste concentrations may be managed as non-hazardous but are subject to waste discharge requirements of the Regional Board.

Enclosed is an "Underground Storage Tank Unauthorized Release (Leak)/Contamination Site Report" forms which should be completed and returned within five (5) working days. Should you have any questions regarding this letter, please contact Lizabeth Rose, Hazardous Materials Specialist at 271-4320.

Sincerely,



Rafat A. Shahid, Chief  
Hazardous Materials Division

RAS:mam

cc: RWQCB  
Emeryville Fire Dept.

Enclosure