

ALABAMA COUNTY
HEALTH CARE SERVICES
AGENCY



R0103

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

November 10, 1992
STID # 4220

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

Mr. Charles Chamness
FAA-AWP-464.10a
P.O. Box 92007-WWPC
Los Angeles, CA 90009

Re: Subsurface Investigation at FAA TRACON Facility at
1029 Grumman St., Oakland CA 94621

Dear Mr. Chamness:

Our office is also overseeing the subsurface investigation at this site currently leased to the FAA. As you are aware, there exists some question as to the source of the "diesel" contamination found in the water sample taken from the excavation pit of the former 1000 gallon underground tank. Your consultant represents that it is FAA's opinion that this contamination is from formerly abandoned fuel tanks of the U. S. Navy or other pre-existing tanks. I understand the Port of Oakland has agreed to provide you with documents concerning previous activities in the TRACON parking lot in an attempt to clarify this issue. You will recall, our office's opinion is that until proof is provided that the contamination is from an offsite source, the responsibility for remediation will remain with the FAA.

Upon review of this case our office has the following items which we would like clarified:

1. The contention has been made that because the soil sample from the stockpile was broken, the 375 parts per million (ppm) diesel found in this sample is invalid. In a technical sense this value may not be the "exact" value for the diesel concentration, however, this value is the approximate concentration of diesel in the sample and this concentration exceeds the threshold concentration of 100 ppm. To assert that no diesel was detected in the stockpile due to this accident is erroneous.
2. Because of the specific high boiling components found in the water sample taken from the tank excavation pit, it is asserted that this contamination and any contamination found in the groundwater beneath this site is from another tank source. Please be advised that all chromatograms of detectable diesel concentrations found in soil and water samples should be provided to verify that no release of diesel fuel has occurred from the 1000 gallon tank removed from this site.

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3. When monitoring wells AW-1 through AW-3 were drilled one soil boring sample from AW-2, the well within the former tank pit, was taken and yielded 580 ppm TPH diesel. This sample, SS-1, was represented in a histogram representing the chromatogram of this sample. This histogram shows that to a large extent, approximately 90%, the material appears to be diesel fuel, therefore a release of diesel has occurred to the soil in the 5-5.5 feet depth range. This depth is within the seasonal high groundwater table and as such a groundwater will be required in FAA's part. The responsibility of the groundwater remediation, though, can still be determined by the documentation you will be providing this office. Please provide the analytical results of all other borings sampled from the installation of the other two wells.

4. Please attempt to provide the chromatogram of the residual product found in any offsite abandoned tank.

5. I have been informed by Mr. Len Sinfield of ASI that additional work is scheduled. This work will include the removal of the contents of the underground tank pit (hopefully to groundwater) and installing an additional well outside the pit area. This work is acceptable and I have informed Mr. Sinfield to contact this office prior to confirmation soil sampling so that I may witness this activity. There seems to be a misunderstanding as to what "clean" soils means. In ASI reports, they have stated 100ppm total petroleum hydrocarbons (TPH) as a level which they will reuse as backfill. Please be advised concentrations of TPH are required to be non-detectable prior to reuse. The 100 ppm concentration is only a guidance concentration which initiates a soil/groundwater investigation recommended in the Tri-Regional Board Guidelines. Site specific conditions will determine the levels, if any, which one which may be left in place without remediation. Given the shallow groundwater at this site, our office would encourage remediation to non-detectable concentrations.

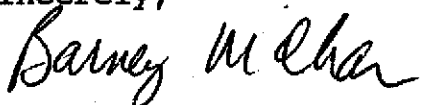
Quarterly monitoring will be required after monitoring well installation and should continue until the site is recommended for site closure.

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Please provide a written comment to our office to the above mentioned items **within 30 days** of receipt of this letter.

You may contact me at (510) 271-4350 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiett, RWQCB
L. Sinfield, Advanced Sciences, Inc., 4909 Murphy Canyon Rd.,
Suite 500, San Diego, CA 92123-4301
N. Werner, Port of Oakland, 530 Water St., Oakland 94604
E. Howell, files

ASRTR

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



(Tracon Facility) 827
1624 Grunthan, Oakland)

RO 622 (ASR #9, Oakland
Airport)

September 16, 1991

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

Mr. Jim Williams
FAA Western Pacific Region
FAA-AWP-464.10A
P.O. Box 92007, WWPC
Los Angeles, CA 90009

Subject: Unauthorized Fuel Release at FAA Airway Facilities
L-827 Tracon and ASR #9 Facility, Oakland CA 94621

Dear Mr. Williams:

Alameda County Environmental Health, Hazardous Materials Division has received the August 30, 1991 report issued by Advanced Sciences, Inc. regarding the removal of the 1,000 gallon diesel tank at the Tracon Facility at the Oakland Airport. Based on the evidence provided in this report, the County does not agree that the contamination found at the site, soil and groundwater, is not from the existing fuel tank. The conclusion of Sarah Battelle, the registered geologist from Advanced Sciences, Inc., is that because the water sample taken from the pit contained higher than diesel hydrocarbons, this contamination is not from the pre-existing diesel tank, and that the FAA is thus not liable for any clean-up. Although this scenario does exist in specific cases where contamination is proven to have been from offsite, considerable evidence must exist for our agency to agree with this decision. To this end, you are requested to address the following items to support this above claim:

1. Please provide the chromatograms of the diesel fuel and any and all fuel oil standards (fuel oil No. 1 and No. 2 etc.) which would help to illustrate the differences in these petroleum cuts.
2. Please provide the chromatogram of the Tracon 5 "Stockpile" soil sample which contained reportedly 375ppm TPH as diesel. Please be advised that stockpiled soils are not distinguished from other typical confirmatory soil samples taken from the ends of a tank and that the 100 ppm TPH suggested in the "Tri-Regional Board Staff Guidelines" applies similarly to these results. The County recognizes that this sample was received in a broken container, however, the analytical results must also support your previous claim.
3. Please provide evidence of potential offsite sources of the fuel oil. Give data to support that the former tank pit location is directly downgradient to this source. Give evidence that the fuel used at this source matches that of the water sample's chromatogram. Monitoring well and borings data can be used as evidence. Unauthorized Release (Leak) Reports or inventory reconciliation sheets can also be used to support the contention.

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4. Provide a complete history of the fuel contents used at this site. Provide all inventory reconciliation and tank tightness test results on this tank.

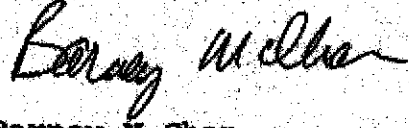
You are requested to address in writing the above items. Please provide these items within thirty (30) days of this letter. Again, be aware that this is a formal request for technical reports pursuant to the California Water Code, Section 13267 (b). Any extensions or agreed upon time deadlines must be confirmed in writing by either this Division or the RWQCB. If this above information does not support your case you will be required to provide the previously requested workplan within thirty (30) days of this decision.

SECOND NOTICE OF VIOLATION

In regards to the other FAA site, the ASR #9 Facility, please note that our Division has not received the requested workplan requested in our July 26, 1991 letter. Please provide this workplan within thirty (30) days of this letter.

You may contact me at (510) 271-4320 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

- cc: G. Jensen, Alameda County District Attorney, Consumer and Environmental Protection Division
- R. Hiatt, RNQCB
- H. Hatayama, DOHS
- L. Sinfield, S. Battelle, Advanced Sciences, Inc.
- L. Mummert, FAA Western-Pacific Region
- P. Murphy, Port of Oakland, Environmental Division

Tracon1

ALAMEDA COUNTY
HEALTH CARE SERVICESAGENCY
DAVID J. KEARS, Agency Director

R0103

May 3, 1990

Mr. Bob Leone
Federal Aviation Administration
ES-E
P.O. Box 2309
Airport Station
Oakland CA 94614

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

Dear Mr. Leone:

This letter is to summarize the phone conversation with Mr. Barney Chan on May 3, 1990. You stated that it was FAA's intention to remove the two 1000 gallon diesel fuel tanks, L827 Grumman and ASR4 Building. In fact, Mr. Richard Sherry submitted to our office Underground Tank Closure/modification plans dated 12-18-89. You also stated that the tanks were thought to be empty or will be emptied since two above ground tanks have been installed to take these tanks places. It was suggested it would be prudent for you to empty the tanks and you stated that the tanks have been precision tested within the past year and were not leaking. The issue of whether FAA was exempted from the fees for our agency's oversight was also discussed. You stated that the removal of the underground tanks will be done by a company contracted for a number of your facilities on the west coast. Our agency requests the following from you:

1. Submit completed Underground Tank Closure/Modification plans. Note the originals were returned to Mr. Sherry due to incompleteness. Enclosed are additional plans and instructions. Please submit two checks payable to Alameda County for \$375.00 each, the removal fee according to our underground fee schedule. Note these payments are for services rendered and are therefore not exempt for governmental agencies such as yourself. Our services will be debited from these deposit fees and any remaining funds will be reimbursed.
2. Verify that the tanks have been emptied or will be emptied.
3. Send copies of the latest tank precision tests for both tanks.
4. Notify our agency, to your best estimate, as to when the tanks are scheduled for removal and keep our office updated as to any changes.

Mr. Bob Leone
May 3, 1990
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Please contact Barney Chan from our office at 271-4320 should you have any questions.

Sincerely,



Edgar B. Howell III
Chief, Hazardous Materials Division

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Lester Feldman, RWQCB
Rafat Shahid, Asst. Agency Director Ala. Cty. Env. Health