



02-16-01

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StID 867

February 16, 2001

Mr.Bob Trent B J Gem Investment Co. P.O. Box 4187 Oakland, CA 94614

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

SUBJECT: INTENT TO MAKE A DETERMINATION THAT NO FURTHER ACTION IS REQUIRED <u>OR</u> ISSUE A CLOSURE LETTER FOR 9131 SAN LEANDRO STREET, OAKLAND, CA

Dear Mr. Trent:

This letter is to inform you that Alameda County Environmental Protection (LOP) intends to . make a determination that no further action is required at the above site or to issue a closure letter. Please notify this agency of any input and recommendations you may have on these proposed actions within 20 days of the date of this letter.

In accordance with section 25297.15 of Ch. 6.7 of the Health & Safety Code, you must provide certification to the local agency that all of the current record fee title owners have been informed of the proposed action. Please provide this certification to this office within 20 days of the date of this letter.

If you have any questions about these proposed actions, please contact me at (510) 567-6762.

Sincerely,

eva chu

Hazardous Materials Specialist

Ct. Chuck Headlee, RWQCB

Leroy Griffin, Oakland Fire Department

amtract-9

ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 111

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

(510) 567-6700

StID 867

February 24, 1999

Mr. Bob Trent P.O. Box 4187 Oakland, CA 94614

RE: Annual Groundwater Monitoring at 9131 San Leandro St, Oakland, CA

Dear Mr. Trent:

This is a letter to follow-up on our teleconference today. I had a chance to review the file for the above referenced site to determine if site closure can be granted at this time. Groundwater at the site has been sampled since March 1994. Petroleum hydrocarbons, chlorobenzene, and 1,4-dichlorobenzene continue to be detected in groundwater. The chlorobenzene and 1,4-dichlorobenzene levels exceed the California Drinking Water Standard's Maximum Contaminant Levels (MCLs).

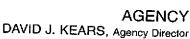
Currently the San Francisco Bay Regional Water Quality Control Board does not grant closure to sites where chlorinated solvents exceed the MCLs. However, because there is sufficient groundwater data for the site, the sampling frequency of Wells MW-2 and MW-3 may be reduced to an annual basis. Groundwater should be sampled in the first quarter of each year until further notice. Groundwater should be analyzed for TPHg, TOG, BTEX, and chlorinated solvents (using Method 8010).

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

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RO# 111

StID 867

October 25, 1996

Mr. Bob Trent P.O. Box 4187 Oakland, CA 94614 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Re: Sampling Frequency at 9131 San Leandro St, Oakland

Dear Mr. Trent:

As a reminder, the sampling frequency and analyses of groundwater at the above referenced site are as follow:

- 1. sample semi-annually (in April and September) well MW-2 for TPHg, BTEX, and HVOCs;
 - 2. sample semi-annually well MW-3 for TPHg and BTEX; and,

3. discontinue sampling wells MW-1 and MW-4.

If you have any questions, I can be reached at (510) 567-6762.

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eva chu

Hazardous Materials Specialist

c: John Alt, Epigene, 38750 Paseo Padre Pkwy, Suite A-11, Fremont CA 94536

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RO# 111

Alameda County CC4500 Environmental Health Services 1131 Harbor Bay Pkwy., #250 Alameda CA 94502-6577 (510)567-6700 FAX(510)337-9335

StID 867

April 26, 1996

Mr. Bob Trent P.O. Box 4187 Oakland, CA 94614

RE: Reduced Sampling Frequency at 9131 San Leandro St, Oakland

Dear Mr. Trent:

I have reviewed the case file for the above referenced site. There is adequate groundwater data available at this time where the sampling frequency may be reduced to a semi-annual basis. Wells MW-2 and MW-3 should be sampled in June and December 1996 and groundwater analyzed for BTEX and chlorinated hydrocarbons, using EPA method 8240.

As long as bailing appears to reduce chlorinated hydrocarbon and BTEX levels in well MW-2, it may be continued.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

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RAFAT A, SHAHID, Assistant Agency Director

ALAMEDA COUNTY-ENV. HEALTH DEPT.

ENVIRONMENTAL PROTECTION DIV. StID 867 1131 HARBOR BAY PKWY., #250

ALAMEDA CA 94502-6577

(510)567-6700

May 9, 1995

Mr. Bob Trent P.O. Box 4187 Oakland, CA 94614

QMR at 9131 San Leandro St, Oakland 94603 RE:

Dear Mr. Trent:

I am the case worker overseeing site cleanup for the above referenced site. Previous subsurface investigations have shown the site to have been contaminated by petroleum hydrocarbons and chlorinated hydrocarbons. Most of the contaminated soil has be removed. Monitoring wells were installed to assess groundwater quality.

The most recent groundwater monitoring report, by Woodward-Clyde, dated July 1994, indicates wells MW-2 and MW-3 still exhibit elevated levels of benzene and chlorobenzene. Additional bailing has reduced the levels of chlorobenzene. A recommendation to continue bailing 3 to 5 casing volumes of groundwater from well MW-2 at least twice per week was approved by this office in August 1994 (see attached letter). To date, we are not in receipt of any reports documenting this work, nor of any recent quarterly monitoring reports (QMRs).

At this time, you are directed to reinstate a quarterly schedule of well sampling and monitoring. Bailing of well MW-2 should continue. Technical summary reports documenting each well sampling and monitoring episode are also due quarterly. This schedule shall continue until further notice.

Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.

If you have any questions, I can be reached at (510) 567-6762.

Hazardous Materials Specialist

enclosure

cc: files (amtract.5)

DAVID J. KEARS, Agency Director

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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
StID 867
State Water Resources Control Board

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 5, 1994

Mr. Albert Ridley Woodward Clyde 500 12th Street, Suite 100 Oakland, CA 94607-4014

RE: Weekly Bailing at Former American Tractor, 9131 San

Leandro, Oakland 94603

Dear Mr. Ridley:

I have completed review of Woodward Clyde's July 1994 Groundwater Monitoring Results report for the above referenced site. With additional bailing at well MW-2, the levels of VOCs have decreased. The recommendation to continue bailing 3 to 5 casing volumes of groundwater from this well at least twice per week is acceptable. If subsequent sampling exhibits elevated levels of VOCs, an offsite investigation may be required. Groundwater extraction records, as well as field notes, should be included in future quarterly monitoring reports. Sampling of well MW-4 may be discontinued at this time.

If you have any questions, I can be reached at (510) 567-6700.

Sincerely,

eva chu

Hazardous Materials Specialist

cc: Moses Libitzky, 1475 Powell, # 201, Emeryville CA 94608

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DAVID J. KEARS, Agency Director

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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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 867

August 2, 1994

Mr. Albert Ridley Woodward Clyde 500 12th Street, Suite 100 Oakland, CA 94607-4014

Weekly Bailing at Former American Tractor, 9131 San RE: Leandro, Oakland 94603

Dear Mr. Ridley:

I have completed review of Woodward Clyde's July 1994 Groundwater Monitoring Results report for the above referenced site. additional bailing at well MW-2, the levels of VOCs have The recommendation to continue bailing 3 to 5 casing volumes of groundwater from this well at least twice per week is acceptable. If subsequent sampling exhibits elevated levels of VOCs, an offsite investigation will be required. Groundwater extraction records, as well as field notes, should be included in Sampling of well MW-4 may future quarterly monitoring reports. be discontinued at this time.

If you have any questions, I can be reached at (510) 567-6700.

Sincerely.

eva chu

Hazardous Materials Specialist

Moses Libitzky, 1475 Powell, # 201, Emeryville CA 94608 cc:

files

DAVID J. KEARS, Agency Director

VROILL (LOP)

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

stID 867

March 14, 1994

Mr. Albert Ridley Woodward Clyde 500 12th St., Suite 100 Oakland, CA 94607-4014 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

subject: QMR at Former American Tractor, 9131 San Leandro,

Oakland, 94603

Dear Mr. Ridley:

I have completed review of Woodward Clyde Consultant's February 1994 Revised Groundwater Monitoring Plan for the above referenced site. This office does not concur that monitoring well MW-4 should be deleted from a quarterly monitoring schedule. This well has only been sampled twice (Sep and Dec 1989). The well has not been sampled in the spring or summer quarter.

At this time, the groundwater monitoring plan can be revised as follows:

1. Wells MW-2, 3, and 4 should be sampled quarterly. The next sampling event should be in March 1994. If well MW-4 does not detect contaminants sought in the next two quarters, it will then be re-evaluated to determine if it can be deleted from further sampling. The next sampling event should also include the analysis for total soluble lead.

In addition to quarterly monitoring/sampling of existing wells, at least one off-site well is required in the down-gradient direction of well MW-2. Please submit a workplan for the installation of this well within 30 days of the date of this letter, or by April 15, 1994.

If you have any questions, I can be reached at (510) 271-4530.

Sincerely,

eva chu

Hazardous Materials Specialist

cc: Moses Libitzky, 1475 Powell, #201, Emeryville 94608 files

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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DAVID J. KEARS, Agency Director

StID 867

September 15, 1993

Mr. Douglas Lovell Streamborn P.O.Box 9504 Berkeley, CA 94709-0504 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

Subject: Groundwater Remediation Plan for 9131 San Leandro, Oakland 94603

Dear Mr. Lovell:

I have completed review of Streamborn's Groundwater Remediation Plan, dated December 4, 1992, for the above referenced site. The plan proposes to remediate soil and groundwater contamination using vapor extraction in combination with air sparging, and by enhanced insitu biodegradation with the addition of nutrients and oxygen to stimulate growth of indigenous bacteria.

The workplan is acceptable in principal but additional information and approval from the Regional Water Quality Control Board (RWQCB) is required prior to the start of implementation of the pilot test. Include types of nutrients and/or chemicals to be injected into soil and groundwater, at what concentration, and for what period of time. A detailed proposal of the bioremediation process should also be submitted to Mr. Richard Hiett, RWQCB, to determine if a waste discharge requirement permit will be needed.

An addendum to the December 1992 workplan should be submitted to this office within 30 days of the date of this letter, addressing the above mentioned concerns. Include an updated project time schedule and a site plan showing locations of extraction/sparging wells, etc.

Streamborn also requested that monitoring well MW-1 be deleted from future sampling and analysis, and that monitoring well MW-3 only be analyzed for BTEX. This office is not in agreement with your recommendation, however, the frequency of analysis can be decreased to an annual basis. Monitoring well MW-1 should be analyzed for TPH-G and BTEX during the spring sampling quarter. And monitoring well MW-3 should be analyzed for TPH as kerosene and BTEX during the same time. If contaminants are detected in future sampling episodes, an increase in sampling frequency may be required.

Mr. Douglas Lovell re: 9131 San Leandro St., Oakland September 15, 1993 Page 2

If you have any questions or comments, I can be reached at the above number.

Sincerely,

eva chu

Hazardous Materials Specialist

cc: John DeClercq, TransAction Financial Corp., 500 12th St., Suite 310, Oakland 94607-4010

Rich Hiett, RWQCB

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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 867

Wred mail DEPARTMENT OF ENVIRONMENTAL HEALTH

September 30, 1992

DAVID J. KEARS, Agency Director

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

John DeClercq old copy in file T. A. EI II 500 12th St., Suite 310 Oakland, CA 94607-4010

Subject: Corrective Action Plan for 9131 San Leandro Street., Oakland 94603

new address

Dear Mr. DeClercq:

This office has reviewed the case file for the above referenced In June 1988, a 1,000 gallon gasoline underground storage tank (UST) was removed and disposed. Soil samples taken in the native soil, beneath the former USTs, exhibited up to 2,000 parts per million of total petroleum hydrocarbons as gasoline and 18,000 parts per billion benzene. Clearly, an unauthorized release of petroleum hydrocarbons has occurred at this site.

At the same time, Robert Gils Associates (RGA) conducted a site assessment of the property, confirming oil, kerosene, solvent, lead, chromium, as well as gasoline contamination in six other areas across the site. RGA began work in September 1989 to remove as much as possible the contaminated soils, without sacrificing the integrity of the building structures. monitoring wells (MWs) were installed at or near each of the contaminated areas. Groundwater samples from MW-2 showed groundwater to be impacted by petroleum hydrocarbons and paint waste products.

A letter, dated December 3, 1990, from Katherine Chesick of this office, requested that additional investigative work be performed to determine the extent of contamination in soil and groundwater. In a recent conversation, you stated that additional work has not In addition, this office is not in receipt of any reports documenting groundwater monitoring and sampling since September 1990.

Title 23 of the California Code of Regulations (23CCR), Section 2652(d), requires the owner or operator of an UST facility to submit reports every three months, or at a more frequent interval as specified by the local agency or regional water board, until investigation and cleanup are complete. In addition, the California Health and Safety Code (CHSC), Section 25298, states that underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge.

John Declercq 9131 San Leandro St., Oak September 30, 1992

Therefore, you are currently in violation of both the CHSC and 23CCR, for which CHSC Section 25299 specifies civil penalties of up to \$5,000, for each day of violation. Failure to furnish technical reports regarding documented or potential groundwater contamination further violates Section 13276 of the California Water Code. The San Francisco Regional Water Quality Control Board (RWQCB) can impose civil penalties of up to \$1,000 per day that such violations continue.

At this time, you are directed to reinstate a quarterly schedule of well sampling and monitoring. Technical summary reports documenting each well sampling and monitoring episode are also due quarterly. This schedule shall continue until further notice.

Additionally, pursuant to requirements set forth under Article 11, 23CCR, Section 2720 et seq., you are further directed to submit a <u>Corrective Action Plan</u> (CAP) proposal detailing plans for remediating the environmental impacts resulting from the unauthorized release at this site. This CAP proposal is due within 45 days of the date of this letter.

All technical reports and proposals must be submitted under the seal of a California -Registered Geologist, -Engineering Geologist or -Civil Engineer.

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

Sincerely,

Eva Chu

Hazardous Materials Specialist

enclosure

cc: Rich Hiett, RWQCB

> Mark Thomson, Alameda County District Attorney's Office Steven Becker, 220 Montgomery, Suite 388, San Francisco,

Carolyn Ratliff, 3298 Sweet Dr., Lafayette, 94549

Edgar Howell/files

R02792

DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200

(415)

Oakland, CA 94621

Certified Mailer #: P 062 128 233

December 3, 1990

Ms. Carolyn Ratliff 3298 Sweet Drive Lafayette, California 94549

Additional Investigative Work at 9131 San Leandro Street, in Oakland, California

Dear Ms. Ratliff:

This is to summarize the work needed at 9131 San Leandro Street as discussed in our meeting today with Steve LuQuire and Lester Feldman of the Regional Water Quality Control Board.

To assist in determining if ground water contamination has migrated or will migrate from the MW-2 area, we request the following work be done at the site:

- 1) Drill four 30-foot soil borings along the northwestern edge of the property (the property boundary along the railroad tracks) "opposite" MW-2. We recommend these borings be continuously cored and logged from 15 to 30 feet. Soil samples for analytical purposes should be collected every five feet, starting at a 5-foot depth. All sample and core depths must be noted on the boring logs. Soil samples should be analyzed for total petroleum hydrocarbons (TPH), total oil and grease, and volatiles (EPA Method 8020). Differentiation of hydrocarbons must be done for all TPH analyses. Note: boring permits must be obtained through the Alameda County Flood Control and Water Conservation District, Zone 7.
- 2) Determine the maximum yield of MW-2 through a pump test; and
- Initiate contact with the property owners northwest of the site in the event borings or wells must be installed off site in the future.

All work must be performed according to the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, revised 10 August 1990 (available from the SFRWQCB data management group at 464-1269). Please note that all work and reports which require geologic or engineering evaluations or judgements must be performed under the direction of an appropriately registered or certified professional.

Page 2 of 2 Ms. Carolyn Ratliff 9131 San Leandro Street December 3, 1990

As a reminder, please note that all proposals, reports and analytical results pertaining to investigation and remediation of this site must be sent to our office, and to Lester Feldman at the following address:

Regional Water Quality Control Board, San Francisco Bay Region 1800 Harrison Street, Suite 700 Oakland, California 94612 (415) 464-1255

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

Sincerely,

Katherine A. Chesick,

Katherine a. Chesik

Senior Hazardous Materials Specialist

cc: John H. DeClercq, TransAction Financial Corporation
Lester Feldman, Regional Water Quality Control Board
San Francisco Bay Region
Howard Hatayama, State Department of Health Services
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Pafet A Shabid Alameda County Environmental Health Department

Rafat A. Shahid, Alameda County Environmental Health Department Files

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Certified Mailer #: P 062 128 049

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

August 17, 1989

Ms. Carolyn Ratliff 3298 Sweet Drive Lafayette, California 94549

**** NOTICE OF VIOLATION ****

Re: Remediation of Contamination at 9131 San Leandro Street, in Oakland, California

Dear Ms. Ratliff:

On May 3, 1989 we issued a letter to you indicating our general concurrence with the remediation plan for 9131 San Leandro Street dated February 2, 1989 and prepared by Robert E. Gils and Associates; we outlined three items we wanted incorporated in the work plan and indicated we wanted to be notified at least two working days before work plan implementation. To date we have not been notified of any work intent or informed of any site work conducted since February 2, 1989.

According to the California Health and Safety Code, California Code of Regulations Title 22, and Resolutions of the San Francisco Bay Regional Water Quality Control Board, this site must be further investigated as well as remediated. Since, to our knowledge, this investigative and remedial work is neither in-progress nor planned, you are in violation of the above referenced codes and resolutions. Within 30 days of the date of this letter, you must submit a timetable for completion of work required in our letters to you dated December 28, 1988, January 17, 1989 and May 3, 1989. Work must commence within 60 days of the date of this letter.

Any requests for changes to these deadlines must be submitted to

Page 2 of 2 Ms. Carolyn Ratliff American Tractor Equipment Corporation August 17, 1989

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

Sincerely,

ow Rafat A. Shahid, Chief,

dgu BHONNE

Hazardous Materials Division

RAS: kac

cc: John H. DeClercq, TransAction Financial Corporation Richard Halket, Robert Gil Associates, Inc. Lester Feldman, 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

HEALTH CARE SERVICES

DAVID J. KEARS, Agency Director

AGENCY



R02792

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

(415) 271-4320

Certified Mailer #: P 833 981 3(9

May 3, 1989

Ms. Carolyn Ratliff 3298 Sweet Drive Lafayette, California 94549

Subject: Review of Remediation Plan for 9131 San Leandro Street, Oakland, California

Dear Ms. Ratliff:

We have reviewed the Remediation Plan for 9131 San Leandro Street, Oakland, prepared by Robert E. Gils and Associates and dated February 2, 1989. We have discussed this plan with Lester Feldman of the Regional Water Quality Control Board (RWQCB) and have no objections to the plan provided the following items are incorporated:

- 1) Each of the six areas to be investigated (hydraulic lift, honing machine, paint booth, main plant, air compressor and gasoline tanks) must be analyzed by TPH diesel with differentiation of kerosene, paint thinner, stoddard solvent, oils, etc.
- 2) Ground water samples from the areas of concern must be analyzed for the same constituents as soil samples are analyzed for (see item 1 above and the Work Plan, item 10).
- 3) Soil aeration procedures shall follow the Bay Area Air Quality Management District's (BAAQMD's) requirements Note: BAAQMD issued a revised Regulation 8 Rule 40, Aeration of Contaminated Soil, on February 15, 1989.

Please notify us of the field work schedule at least 2 working days before field work commences.

Page 2 of 2 Ms. Carolyn Ratliff American Tractor Equipment Corporation May 3, 1989

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

Sincerely,

Edgar BHOWell for Rafat A. Shahid, Chief,

Hazardous Materials Division

RAS: kac

cc: John H. DeClercq, TransAction Financial Corporation
Richard Halket, Robert Gil Associates, Inc.
Lester Feldman, Regional Water Quality Control Board
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

DAVID J. KEARS AGENCY



Department of Environmental Health Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621

RO2792 (SLIC)
PROIII (LOP)
ROHH

Telephone Number:(415) 271-4320

Certified Mailer #: P 833 981 220

January 17, 1989

Ms. Carolyn Ratliff 3298 Sweet Drive Lafayette, California 94549

Subject: Remediation Requirements for 9131 San Leandro Street,

Oakland, California

Dear Ms. Ratliff:

We have received and reviewed Robert E. Gils & Associates' site assessment report for 9131 San Leandro Street in Oakland, dated July 6, 1988. Oil, kerosene, solvent and gasoline soil contamination was confirmed in six areas across the site. We have discussed this site with Lester Feldman of the Regional Water Quality Control Board (RWQCB) and require that you submit a work plan addressing the following items:

- 1) Discussion of the materials used on site (metals, lubricants, paint, thinner, fuels, etc.) during operation of American Tractor Equipment Co. Include specific information on the material types;
- 2) Remediation/further sampling of solvent contaminated soil in the vicinity of the paint booth (maximum levels detected, at a depth of 2 feet: 120 mg/kg ethylbenzene, 78 mg/kg toluene, 1100 mg/kg xylene);
- 3) Remediation/further sampling of hydraulic fluid contaminated soil in the auto shop (5220 mg/kg petroleum hydrocarbons at a depth of 2 feet) and of the lubricating oil contaminated soil in the former air compressor area (1080 mg/kg waste oil at a depth of 2.6 feet);
- 4) Remediation/assessment of oil contaminated soil in the main plant (110 ppm hydrocarbons at a depth of 3.5 feet) and of kerosene contaminated soil beneath the former honing machine (300 mg/kg total fuel hydrocarbons at a depth of 3 feet);
- 5) Installation and sampling of one groundwater monitoring well in each of the contaminated areas listed in items 2), 3), and 4) above. Wells may be installed at the point of highest documented soil contamination and must monitor the first water bearing zone. The base of each well must be seated in low permeability sediments;

Page 2 of 3 Ms. Carolyn Ratliff American Tractor Equipment Corporation January 17, 1989

- 6) Assessment of potential soil contamination in the vicinity of the underground fuel tank excavated years ago east of the auto shop;
- 7) Analysis of the dust from the northern corner of the paint shop (sample 1204) for chromium VI;
- 8) Assessment of potential lead and chromium contamination in and around the steam cleaning area drain (northwest of the auto shop);
- 9) Remediation of lead dust in the paint and sandblasting shops and remediation of lead contaminated soil along the railroad spur;
- 10) The contaminants to be looked for in each sample and the proposed analytical methods to be used. Soil samples collected from known solvent-contaminated areas must, at a minimum, be analyzed by EPA Method 8240. In addition, a minimum of one soil sample collected from each of the other contaminated areas must be analyzed by EPA Method 8240 to determine if solvents are present. At a minimum, groundwater samples must be analyzed by EPA Method 624. All analyses are to be done by a California State Certified Laboratory;
- 11) The number and location of samples to be collected. Following remediation, soil samples collected must be sufficient to confirm that the full vertical and lateral extent of soil contamination has been remediated; and
- 12) The proposed soil clean-up levels.

The work plan shall be submitted within 60 days of receipt of this letter.

All proposals, reports and analytical results pertaining to any environmental work done on site must be sent to our office and to the RWQCB. Because the site has solvent contamination, the entire site - including remediation related to the former underground tanks - will be handled as a toxics case. Site documents should therefore be sent to the RWQCB in care of Lester Feldman, as follows, rather than in care of Lisa McCann, as was stated in our December 28, 1988 letter.

Lester Feldman North Bay Toxics Cleanup Regional Water Quality Control Board 1111 Jackson Street Oakland, Ca. 94607 (415) 464-1255 Page 3 of 3 Ms. Carolyn Ratliff American Tractor Equipment Corporation January 17, 1989

This letter, combined with our letter dated December 28, 1988, completes our review of reports received on the site to date. To cover the time we anticipate spending on site regulatory work, please submit an additional \$600. Should you have any questions, please contact Katherine Chesick, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,

Ref (A Shel)
Rafat A. Shahid, Chief,

Hazardous Materials Division

RAS: kac

cc: John H. DeClercq, TransAction Financial Corporation
Richard Halket, Robert Gil Associates, Inc.
Lester Feldman, Regional Water Quality Control Board
Lisa McCann, 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, Hazardous Materials Division
Files

AGENCY

DAVID J. KEARS, Agency Director

Depart of Environmental Health Hazardous Materials Division 80 Swan Way, Room 200 Oakland, CA 94621 R02792

VROIII

(415) 271-4320

Certified Mailer #: P 833 981 156

December 28, 1988

Ms. Carolyn Ratliff c/o American Tractor Equipment Corporation P.O. Box 1226 Oakland, California 94604

Subject: Remediation Requirements for the Former Underground Storage Tank Area, 9131 San Leandro Street, Oakland

Dear Ms. Ratliff:

We have received and reviewed the Environmental Technology reports dated July 11, 1988 and October 12, 1988 and your letter dated October 20, 1988 concerning the removal of one 1,000 gallon gasoline underground storage tank on June 29, 1988, at American Tractor Equipment Corporation located at 9131 San Leandro Street, Oakland. At the time of tank removal, strong petroleum odors emanated from the excavated sandy backfill and native clay soil and a petroleum-like sheen was observed on groundwater encountered in the excavation roughly nine feet below ground surface. Soil samples collected immediately following tank and soil removal contained up to 2000 ppm hydrocarbons. These conditions require performance of additional site characterization work, as outlined below. Please note that, for the following reasons, we do not feel the above conditions could have been caused by gasoline which you believe may have spilled from the tank during tank removal:

- * strong petroleum hydrocarbon odors were detected in the area of the excavation following uncovering of the tank and during and following excavation of backfill and native soil;
- * a significant quantity of backfill and soil were excavated following tank removal before soil samples were collected; and
- * the soil sampled was a moist silty clay whose freshly broken surfaces smelled of gasoline.

We have conferred with Lisa McCann of the Regional Water Quality Control Board (RWQCB) and require that you submit a work plan addressing the following items; all work must be performed according to the Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks, 2 June 1988 (2 June 1988 RWQCB document):

Page 2 of 3 Ms. Carolyn Ratliff American Tractor Equipment Corporation December 28, 1988

- 1) Collection of soil samples to determine vertical and lateral extent of soil contamination (see also the LUFT manual for details concerning soil sampling). Soil samples are to be taken at a minimum of every five feet in the unsaturated zone and at any changes in lithology during drilling of all boreholes and monitoring wells. Soil samples are to be analyzed by a California State Certified Laboratory for the appropriate constituents (Table 2, 2 June 1988 RWQCB document, see attached).
- 2) Installation of one monitoring well within 10 feet of the tank in the verified down gradient direction (see also the LUFT manual for details concerning monitoring well construction). If verified downgradient direction data is not available, then a minimum of three monitoring wells must be installed to determine the verified downgradient direction.
- 3) Sampling of the monitoring well and analysis of the sample for the appropriate constituents (Table 2, see attached). The well must also be tested for floating product by an optical probe or other method having equal accuracy.
- 4) Remediation or disposal of excavated fill and soil currently stockpiled next to the excavation. Please note that any soil placed back into the excavation must have total petroleum hydrocarbon levels below 100 ppm.
- 5) Remediation of unexcavated 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.

Please submit this plan within 60 days of receipt of this letter. 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. ...[While] initial tank removal and soil sampling [do] not require such expertise...borehole and monitoring well installation and logging, and impact assessments do require such a professional.

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

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

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

Sincerely,

Ryc A. Shelw

Rafat A. Shahid, Chief, Hazardous Materials Division

RAS: kac

cc w/ attachment:
 John H. DeClercq, TransAction Financial Corporation
 Richard Halket, Robert Gil Associates, Inc.
 Lisa McCann, 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, Hazardous Materials Specialist
 Files

attachment

Department of Environmental Health Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621

R02792 (suc) VR0111 (LOP)

DAVID J. KEARS, Agency Director

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(415) 271-4320

Certified Mailer #: P 708 402 826

AGENCY

November 22, 1988

Mr. John H. DeClercq TransAction Financial Corporation 414 13th Street 7th Floor Oakland, Ca. 94612

Subject: Review of 9131 San Leandro Street, Oakland, Information

Dear Mr. DeClercq:

We have reviewed the information submitted to our office by both you and Carolyn Ratliff concerning 9131 San Leandro Street in Oakland. We are in the process of discussing the site conditions with the Regional Water Quality Control Board in order to assess appropriate remediation for the property. We will contact you shortly concerning our findings and requirements. Please contact Katherine Chesick, Hazardous Materials Specialist, at 271-4320 if you have any questions in the interim.

Sincerely,

Rafat A. Shahid, Chief, Hazardous Materials Division

PALBSW

RAS: kac

cc: Carolyn Ratliff
Rich Halket, Robert Guild Associates, Inc.
Lisa McCann, 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, Hazardous Materials Specialist
Files