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FAX

To: Mr. Barney Chan
Alameda County

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 CC: _____

From: Dale van Dam

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REMARKS: Urgent • For your review Reply ASAP Please comment
 ORIGINALS Will follow Will not follow

Original w/ copies of certified lab report will be mailed today. I will call next week to discuss with you - call sooner if you have reviewed it already.

-Dale

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May 23, 1996
Project No. 05-000428



Mr. Barney Chan
Hazardous Materials Inspector
Alameda County Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577



Subject: Additional Stockpiled Soil Sampling Results
444 Hegenberger Road, Oakland, California

ENVIRONMENTAL
ENGINEERING

Dear Mr. Chan:

INDUSTRIAL
HYGIENE

Northwest Envirocon, Incorporated (NWE) has prepared this letter to document results of additional sampling of a soil stockpile at the subject Property. It is estimated that 350 to 400 cubic yards of soil are currently stockpiled on the property.

CONSTRUCTION
MANAGEMENT

NWE initially conducted sampling of the soil stockpile in February 1996 for petroleum constituents, including gasoline, diesel, and motor oil. Those results were submitted to you by NWE in a letter report dated March 12, 1996. Results of the February sampling are compiled in Table 1. After receipt of the February 1996 results, NWE contacted Mr Stewart Podolsky of WEST Laboratories, the company performing the analyses, to discuss the results, especially the reported detections of TPHm (Table 1). Mr. Podolsky indicated that the chromatogram of each sample indicated the presence of asphalt in the soil stockpile (even though quantified as motor oil on the lab reports, the pattern indicated the TPH was in the asphalt range). Mr. Podolsky indicated that asphalt will dissolve slowly in soil and if the stockpiled soil contained asphalt and has been at the site for some length of time, it would not be unusual to detect the presence of asphalt in the soil samples. NWE personnel did note the presence of asphalt (along with bits of concrete and other materials) in the stockpiled soil. Available information indicates the stockpile has been at the site for at least 5 years. The field observations and laboratory results are consistent with the presence of asphalt, which may have been removed from the site at the same time the stockpiled soil was generated.

LABORATORY
SERVICES

MAINTENANCE
ENGINEERING

ASBESTOS
SERVICES

After your review of the February 1996 sampling results, you indicated concern regarding the origin of the stockpiled soil. In our discussions, you raised the possibility of an off-site source for the soil. Although there is no specific evidence of an off-site origin, documentation regarding the excavation of the soil from the site is also lacking. As a result, it was decided that additional sampling and analyses be conducted for constituents besides petroleum

ENVIRONMENTAL
TRAINING

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hydrocarbons. The additional sampling and analyses were agreed to and documented in correspondence from NWE dated

TABLE 1. Stockpiled Soil Sample Analytical Results
February 1996
444 Hegenberger Road, Oakland, California
(concentrations in milligrams per Kilogram)

Sample Number	TPHd ¹	TPHm ²	TPHg ³	Benzene	Toluene	Ethyl-benzene	Xylenes
1-A-E	<30 ⁴	330	<1.0	<0.0050	<0.0050	<0.0050	<0.0050
2-A-E	<20 ⁴	440	<1.0	<0.0050	<0.0050	<0.0050	<0.0050
3-A-E	<20 ⁴	170	<1.0	<0.0050	<0.0050	<0.0050	<0.0050
4-A-E	<10 ⁴	110	<1.0	<0.0050	<0.0050	<0.0050	<0.0050
5-A-E	<10 ⁴	240	<1.0	<0.0050	<0.0050	<0.0050	<0.0050
6-A-E	37 ⁵	320	<1.0	<0.0050	<0.0050	<0.0050	<0.0050
7-A-E	21 ⁵	280	<1.0	<0.0050	<0.0050	<0.0050	<0.0050
8-A-E	<10 ⁴	180	<1.0	<0.0050	<0.0050	<0.0050	<0.0050

TPHd¹ = Total petroleum hydrocarbons as diesel.
 TPHm² = Total petroleum hydrocarbons as motor oil. Lab reports contain the notation: "Oil range pattern is consistent with the presence of asphalt in the sample," for each sample reporting detectable concentrations of TPHm.
 TPHg³ = Total petroleum hydrocarbons as gasoline.
⁴ = Increased reporting limit due to oil range interference.
⁵ = Not typical diesel.

(Dale Kletthe)

April 24, 1996. Samples were collected on April 30, 1996 by NWE. Sample collection was observed by a representative of Alameda County. Additional soil sample analyses included:

One additional composite soil sample was collected and submitted for analysis of:

Pesticides and poly-chlorinated biphenyl compounds (PCBs) (EPA Method 8080).
 Semi-volatile Organic Compounds (SVOCs) (EPA Method 8270)

Four discrete soil samples were collected and submitted for analysis of:

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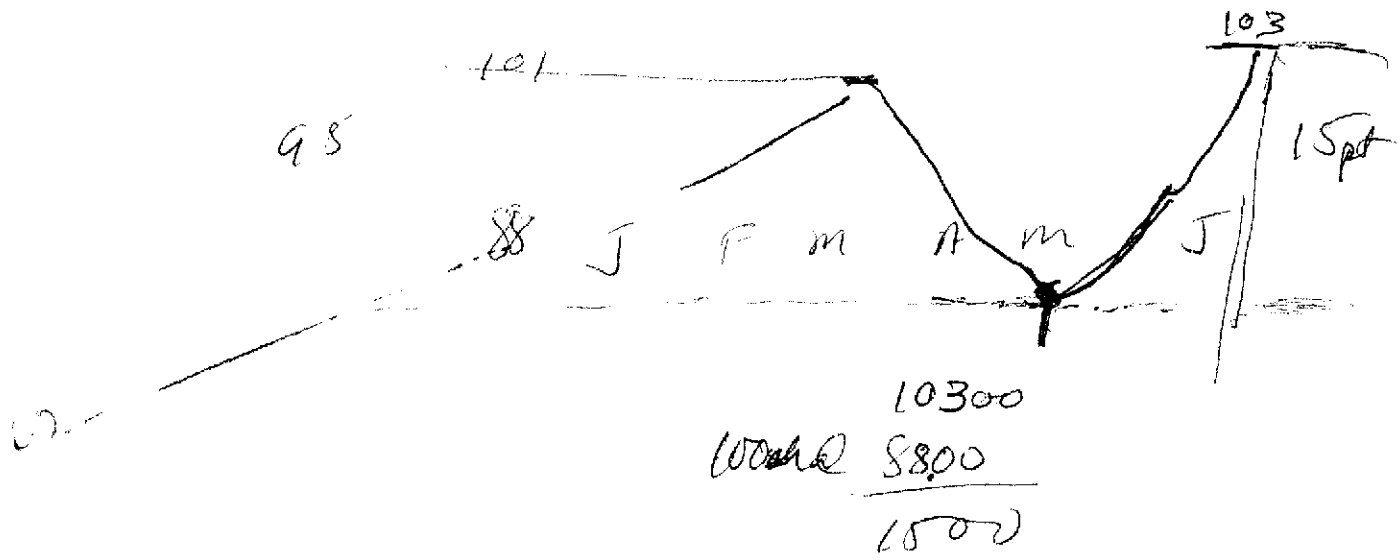
Solvents (EPA Method 8240)
Lead, Nickel, Zinc, Chromium, Cadmium, and Arsenic
(EPA Methods 7000/6010)

4 pt composite

Sample SB-1A-1D (the composite soil sample) was analyzed for pesticides, PCBs and SVOCs. The only compounds detected were butylbenzylphthalate (at a concentration of 0.78 milligrams per Kilogram (mg/Kg)) and chlordane (reported as chlordane technical) at a concentration of 0.51 mg/Kg. Narrative prepared by WEST Laboratories accompanying the sample results indicates that butylbenzylphthalate is a common component of plastics that is not listed as an EPA or California hazardous waste in Title 22. Chlordane is a pesticide commonly used around buildings for control of termites and ants. Chlordane is extremely persistent; the low levels reported could result from incidental use of chlordane "many years ago." At the detected concentration, chlordane is not classified as hazardous under any of the criteria of Title 22.

STL 0.25
TLC 2.5
2/1/95
Incl PRG
1.5 mg/kg
Revised PRG
0.34 mg/kg

Discrete samples SB-2, SB-3, SB-4, and SB-5 were analyzed for solvents and selected metals. Solvents were not present in these samples at detectable concentrations. The metals results are compiled in Table 2 (the soil samples were actually run for the CAM-17 metals series, which includes the 6 metals listed above). The analytical results for metals indicate concentrations within background levels for the respective metals. Copies of certified analytical reports are attached.



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TABLE 2. Soil Sample Analytical Results - Selected Metals
April 1996
444 Hegenberger Road
Oakland, California
(concentrations in milligrams per Kilogram)

Analyte	Sample SB-2	Sample SB-3	Sample SB-4	Sample SB-5
Antimony (Sb)	<5.0	<5.0	<5.0	<5.0
Arsenic (As)	7.4	5.2	5.3	6.8
Barium (Ba)	140	130	150	130
Beryllium (Be)	0.61	0.61	0.61	0.64
Cadmium (Cd)	<0.40	<0.40	<0.40	<0.40
Chromium (Cr)	38	37	37	36
Cobalt (Co)	11	12	9.8	11
Copper (Cu)	54	36	59	42
Lead (Pb)	38	32	55	39
Mercury (Hg)	0.094	0.12	0.11	0.10
Molybdenum (Mo)	<2.0	<2.0	<2.0	<2.0
Nickel (Ni)	46	45	47	45
Selenium (Se)	<2.0	<2.0	<2.0	<2.0
Silver (Ag)	<0.70	<0.70	<0.70	<0.70
Thallium (Tl)	<0.50	<0.50	<0.50	<0.50
Vanadium (V)	44	43	44	44
Zinc (Z)	110	100	130	92

ITLC STG

500 5

10,000 10

75 .75

.2 20

Analytical results from February 1996 indicate that the stockpiled soil does not contain TPHg, or BTEX, and only contains TPHd at concentrations less than 50 mg/Kg. The reported detection of TPHm is probably indicative of the dissolution of bits of asphalt present within the stockpiled soil. Analysis for solvents (conducted on soil samples collected in April 1996) were negative. Concentrations of metals contained in the stockpiled soil appear to be within expected background concentrations. The only SVOC detected was butylbenzylphthalate, an unregulated organic compound. Chlordane, a persistent pesticide, was also detected, but at a concentration less than 1 mg/Kg, in the composite sample.

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The analytical data presented in this letter and a previous letter (dated March 12, 1996) indicate that the stockpiled soil is suitable for use as backfill material at the subject Property. NWE proposes that a portion of the stockpiled soil be used to backfill a tank excavation (tank removal permits have been approved by Alameda County). The balance of the stockpiled soil will be dispersed at locations on the site that are presently bare soil. NWE proposes to move the soil at the same time equipment is on site to remove the existing underground storage tank. NWE wishes to proceed with this work as soon as possible.

Please call me immediately at 800/395-3570 if you have questions or need additional information.

Sincerely,

Dale A. van Dam, R.G.
Hydrogeologist

Attachments