Heilshorn Environmental Engineering

October 15, 1999

Stid 3030

Mr. Amir Gholami
Alameda County Health Care Services
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

SUBJECT: Workplan Modification and Implementation per Letter Dated October 4, 1999
REGARDING: Beck Roofing, 21123 Meekland Avenue, Hayward, CA 94541, Stid 3030

Dear Mr. Gholami:

This letter responds to your letter dated October 4, 1999 regarding the above referenced site and subject. Each of the four items in your letter will be addressed in turn. An additional item, item 5, discusses the response time frame. The October 4 letter items are shown in italic type. Responses are shown in plain type.

1. *Soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology, and not just at the deeper depth.*

Soil contamination was not observed in soil samples shallower than 20 feet below ground surface (bgs) outside of the tank pit area and MW-3. MW-3 will be evaluated semi-annually. The tank pit area was back filled with a cement-like material. Therefore, shallow soil samples cannot be collected in this area because native soils are not present. The data indicate that the plume outside the tank pit exists at depth between a minimum of 20 feet bgs to about 35 feet bgs. Attachment 1 tables list the soil data for the tank pit and soil borings. Collection of shallower samples should not help delineate the current extent of the plume observed in 1991 and 1994.

Heilshorn Environmental Engineering (HE2) will modify the Workplan dated August 23, 1999 (Workplan) to include sample collection every five feet from 20 feet to 35 feet bgs, an increase of four soil samples.

2. *You may perform analysis of MW-3 on a semi-annual basis.*

Thank you. MW-3 will be sampled again in January 2000 and semi-annually thereafter until analytical results meet closure requirements.

3. You may use the present numbers in calculating the Tier II risk assessment as discussed.

HE2 proposes that the RBCA analysis be reevaluated after collection of the new soil data. This will enable evaluation of current conditions rather than re-evaluation of past conditions. The new data will be compared to RBCA Tier I criteria. If the data exceed Tier I and county closure criteria, then HE2 may perform a Tier II evaluation.

HE2 P.O. Box 20546 El Sobrante, CA 94820-0546 510/222-7968 fax 510/222-8573 edheilshorn@earthlink.net

4. *Per Cal EPA and RWQCB guidelines, you need to test for the presence of all oxygenated contaminants such as TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure the absence of the indicated constituents.*

Groundwater analyses performed in January 1999 included oxygenated constituents. The results were ND except for MW-3 which contained low levels of MTBE (3.3 μg/L) and EDC (11 μg/L). The Attachment 2 table presents these analytical results.

5. *Please reply to the above items within 30 days or by November 4, 1999.*

The letter is dated October 4, 1999. However, the letter was postmarked October 12 and received by HE2 on October 14. HE2 and Beck Roofing request additional time to obtain cost pre-approval from the State Underground Tank Fund and to complete the scope of work described in the work plan. Beck and HE2 will endeavor to complete the work and submit a report to Alameda County by November 19, 1999, but may require until November 30, depending on response time form the Fund. **Therefore, we are requesting an extension until November 30 to complete the work and submit the final report.**

What happened to 1995 sample?

HE2 proposes to implement the Workplan dated August 23, 1999 with the following modifications:

A. **Soil samples will be collected every five feet from 20 to 35 feet bgs in each of the four geoprobe holes.**

B. **HE2 will perform a Tier I RBCA analysis based on the data generated form the new soil samples. This evaluation will be part of the report described in the Workplan. A Tier II evaluation will be performed only if more than 10% of the sample analyses (2 samples) exceed the Tier I criteria for benzene.**

C. Samples will be analyzed for TPHg and BTEX/MTBE only. Samples from this site were analyzed for oxygenated compounds in January 1999.

Beck Roofing and its consultant HE2 will implement the Workplan as amended by items A, B and C above, and submit the report to Alameda County Environmental Health Services by November 30, 1999 unless we receive correspondence from you requesting further changes to the Workplan.

Please feel free to call me with any questions regarding this report. I may be reached by telephone (510-222-7968), fax (510-222-8573) or email (edheilshorn@earthlink.net).

Proposal to do soil sampling 5 ft interval between 20-35 ft BGS

Sincerely,
Heilshorn Environmental Engineering

Ed Heilshorn

Elyse D. Heilshorn, P.E.
Consulting Engineer

cc: Mary Beck, Beck Roofing
Elsie Matsuno, Brown and Sullivan

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ATTACHMENT 1
PREVIOUS SOIL DATA

TABLE 2 SUMMARY OF SOIL DATA – TANK REMOVAL AND OVER EXCAVATION PITS

Date	Location	Depth Ft,bgs	TPHg mg/kg	Benzene µg/kg	Toluene µg/kg	Ethyl-benzene µg/kg	Xylenes µg/kg	Lead mg/kg
Tank	Removal	Pit	Sidewall	Samples	(Blaine per	L&W, 92)		(Organic)
5/20/91	Tank pit fill end	8	1,300	6400	7700	0800	230000	0.22
	Tank pit opposite fill end	7.5	1800	5800	75000	33000	210000	0.66
Tank Pit	Over Excavation	Sidewal l	Samples	(L&W,	92)			(Total)
11/91	North wall	15	1.5	8	50	16	210	
	North wall	16	4200	6300	240000	1000000	550000	11
	North wall	17	2740	16000	240000	120000	650000	ND
	Floor, center	16	780	830	1500	6300	48000	NT
	Center Floor	17	5760	30000	450000	230000	1270000	7.25
	Center floor	18	6800	4000	440000	140000	770000	12.2
	South wall	15	ND	11	71	15	87	8.3
	South wall	16	3200	1800	100000	60000	350000	8.4
	South wall	17	720	400	13000	8400	90000	9.35
	East wall	14	170	ND	2700	1500	10000	NT
	East Wall	16	1.2	ND	40	8	48	ND
	West Wall	16	1.0	ND	9	ND	29	4.0

Notes:
BTEX units µg/kg (original analyses in mg/kg)
TPHg and lead units, mg/kg
ND Not detected above method detection limit
NT Not tested

TABLE 2 SUMMARY OF SOIL DATA – TANK REMOVAL AND OVER EXCAVATION PITS (continued)

PPM soil

Date	Location	Depth Ft,bgs	TPHg mg/kg	Benzene mg/kg	Toluene mg/kg	Ethyl-benzene mg/kg	Xylenes mg/kg	Lead mg/kg
Tank	Overexcavation	Sidewall	Confirm'n	Samples	(Lusch Geo	, 94)		(Not analyzed)
11/94	SW-1	30.0*	32	0.52	0.93	0.52	1.6	
	SW-2	25.0	82	0.43	3.2	1.5	4.5	
	SW-3	25.0	320	1.5	6.7	4.6	15	
	SW-4	30.0*	2.4	0.17	0.50	0.11	0.38	
	SW-5	25.0	28	0.14	0.91	0.37	1.3	
	SW-6	31.0	740	5.7	18	7.1	22	
	SW-7	25.0	3600	0.26	160	72	220	
	SW-8	31.0*	30	<0.005	2.8	0.76	2.2	
	SW-9	25.0	<1.0	<0.005	<0.005	<0.005	<0.005	
	B-10	31.0*	<1.0	<0.005	0.013	0.006	0.027	
	SW-11	18.0	<1.0	<0.005	<0.005	<0.005	<0.005	
	SW-12	18.0	<1.0	<0.005	<0.005	<0.005	<0.005	
	SW-13	18.0	<1.0	<0.005	<0.005	<0.005	<0.005	

Notes:

Results in parts per million (milligrams per kilogram)

* = Samples collected at bottom of the excavation

up to @ 20 ft not much now filling with cement. AG

TABLE 3 SUMMARY OF SOIL DATA – SOIL AND MONITORING WELL BORINGS

Date	Location	Depth Ft,bgs	TPHg	Benzene	Toluene	Ethyl-benzene	Xylenes	Lead
Soil	Boring Samples	(L&W,	92)					Total
10/91	MW-1	5	ND	ND	16	ND	14	ND
		10	ND	ND	10	ND	7	ND
		15	ND	ND	13	ND	7	ND
		20	ND	ND	10	ND	6	ND
		25	ND	ND	24	ND	7	ND
		30	ND	ND	11	ND	6	5.00
		35	ND	ND	10	ND	6	5.50
		40	ND	ND	16	ND	6	ND
		45	ND	ND	15	ND	6	4.3
10/91	MW-2	5	ND	ND	ND	ND	ND	ND
		10	ND	ND	ND	ND	ND	ND
		15	ND	ND	ND	ND	ND	ND
		20	ND	ND	ND	ND	ND	5.90
		25	1.4	100	85	14	90	ND
		30	ND	44	8	ND	ND	ND
		35	ND	6	ND	ND	ND	4.20
10/91	B-1	5	ND	ND	17	ND	ND	ND
		10	ND	ND	11	ND	ND	ND
		15	ND	ND	12	ND	ND	ND
		20	5.7	250	600	100	570	5.82
		25	8.8	140	600	126	760	4.20
	B-2	5	ND	ND	18	ND	ND	ND
		10	ND	ND	13	ND	6	4.00
		15	ND	ND	6	ND	ND	ND
		20	ND	46	11	14	40	ND
		25	35	440	1200	320	1800	ND
		30	36	270	87	37	2.1	ND

TABLE 3 SUMMARY OF SOIL DATA – SOIL AND MONITORING WELL BORINGS (continued)

Date	Location	Depth Ft,bgs	TPHg	Benzene	Toluene	Ethyl-benzene	Xylenes	Lead
Soil	Boring Samples	(L&W,	92)					Total
	MW-3	5	1	ND	18	ND	ND	ND
		10	ND	ND	ND	ND	ND	3.60
		15	ND	ND	28	ND	ND	3.60
		20	2.9	21	17	6	25	5.80
		25	6.2	48	22	12	56	ND
		30	9.8	250	15	48	260	3.90
		35	ND	ND	14	ND	ND	3.75
Soil	Boring Samples	(Anderso n	94)					
7/94	SB18 (MW-4)	25.5-35.5	ND	ND	ND	ND	ND	NA
	SB19 North of MW4	25.5-35.5	ND	ND	ND	ND	ND	NA
	SB20 South of MW-4	25.5-35.5	ND	ND	ND	ND	ND	NA
	SB21 (within the excavation area)	28.5	180	2200	8700	4800	22000	NA
	SB21 (within the excavation area)	29.0	430	11000	42000	14000	69000	NA
	SB21 (within the excavation area)	29.5	550	13000	64000	25000	120000	NA

Notes:
BTEX units µg/kg (original analyses in mg/kg)
TPHg and lead units, mg/kg
ND Not detected above method detection limit
NA Not analyzed

ATTACHMENT 2
GROUNDWATER DATA INCLUDING OXYGENATE ANALYSES

TABLE 5 JANUARY 1999 GROUNDWATER ANALYTICAL REPORTS

Constituent Analyzed	MW-1	MW-2	MW-3	MW-4	Reporting Limit, µg/L
TPHg	ND	ND	230	ND	50
Benzene	ND	ND	6.2	ND	0.5
Toluene	ND	ND	ND	ND	0.5
Ethylbenzene	ND	ND	7.3	ND	0.5
Xylenes	ND	ND	ND	ND	0.5
Di-isopropyl Ether (DIPE)	ND	ND	ND	ND	1.0
Ethyl tert-Butyl Ether (ETBE)	ND	ND	ND	ND	1.0
Methyl tert-Butyl Ether (MTBE)	ND	ND	3.3	ND	1.0
tert-Amy Methyl Ether (TAME)	ND	ND	ND	ND	1.0
tert Butanol	ND	ND	ND	ND	5.0
Ethlyene Dibromide (EDB)	ND	ND	ND	ND	1.0
1,2-Dichloroethane (1,2-DCA) also called Ethylene Dichloride (EDC)	ND	ND	11	ND	1.0

Units: µg/L

Works?
MW-3
But must check in it now