

6/5/95 Spoke w/Rick Pilat: He heard from State Fund, and they promised DP LOCs! Yeah! Told him I'd write him a letter.

Wrote ltr to RP

1/18/96 mess fm Rick Pilat: did they ever do GWE? We have it listed as "GT, ED" in Rbase. They did SVE. So maybe Rbase should say "VE" instead of "GT."

1/19/96 phoned R. Pilat: My most recent QR is March 1995. He thinks they may have been sent to 80 Swan Way. He will send the Qrs to date. Wants to go semi-annual instead of quarterly. Yes, they did GWE at one point. Did a pump test to show pump rates were too low. Was it pump and treat? Don't know. Where did the water go? POTW maybe. He has to look at file. But he's sure it was GWE.

*no GWE,
just
pump test*

3/1/96 Reviewed 8/3/95 QR by RSI. GW sampled on 6/14/95 flowed South (generalized flow; Fig 2). What's this generalized flow crap? Get me an actual potentiometric map!!! Typo pg 2. GWE decreased approx 1' except in RS4, it increased by .7ft. They started analyzing MTBE this Q. Increased hits in RS1 and RS2. Max concs 49,000 ppb TPHg and 1300 ppb benzene (RS2). That's 2.65% benzene in gasoline. That's on the high side. RS2 is next to fuel USTs. Hmmm.

4/3/96 Reviewed 1/4/96 QR by RSI. GW sampled 11/1/95. Most concs decreased. Did GWes also? I'd like to have a table of historical GWes. They had one in the last QR.

4/4/96 lm Rick Pilat re this.

4/15/96 spoke w/JR: told him we need a table of historical GWes. He will tell Rick. They are category C.

4/30/96 the property owner (Shahram) phoned: 530-8125. He wants to know how much longer it will be until closure ltr? He needs to get a loan. So he can get the \$\$ to replace the USTs. He owes \$100,000 to Desert.

Reviewed the file. Reviewed March 1996 QR by RSI. GW sampled on 2/29/96 flowed WHICH WAY??? NO POTENTIOMETRIC MAP AGAIN!!! Max gw concs: 1,400 ppb benzene and 75,000 ppb Tphg (RS2). Typo in Table 2: RS4 should read 0.096 ppm TPHg, not 96 ppm.

Phoned JR: lm

3/18/96 phoned Gil Currier of Sealand: he will send me such a map (also showing Pier and Maritime Sts.).

4/5/96 Reviewed the Sealand map from Gil Currier. Copied it and sent it to John Prall. We think these 2 tank sites far apart to be of influence on each other.

*re clos ltr,
see p. 4+5*

Correspondence fm JP: one big map of the whole area, showing this site (Yusen) in relation to Sealand USTs, etc. GREAT MAP!!! But Sealand's USTs far away (approx 400ft) to be a candidate for source of contam in Yusen's UG MW3. Still, I can look at ASTM RBCA for benzene, gw to air, comm pathway, 10-5 RBSL is 53,400 ppb. So it's protective of human health, but what about the estuary? Well, the DG MW is MW2, and it's closer to the estuary, in the direction of the estuary. MW2 has been ND for BTEX as a whole. So, I could give closure a try. Still, the question remains: what is the UG source of contam in MW3?

WROTE CLOSURE SUMMARY

5/9/96 phoned Jprall Does he want to leave Mws in place? Are there USTs/ASTs? Soil disposal? He said Jon Amdur is back at the Port in the Env Planning/dredging unit.

6/17/96 discussed the UG well w/Tom. He is reviewing this case for closure. Decided that I should do a site survey to see if there are any USTs 100' UG of this well (MW3).

6/18/96 Did a site survey. The road which MW3 is installed is approx 60-80' wide. The area directly UG is all paved; it is a parking lot. There are no indications of a UST in this area.

6-24 revised clo sum

4/30/96 I think it wd be ok to go semi-annual at this site. But we need to see decreasing trends!

Spoke w/JR: JR thinks he's working thru the loan program thru the RWQCB for upgrading the USTs. It's part of the CleanUp Fund. Told him we could use the ASTM guidance for RBCA now. As an update to their CAP dated 2/3/95. Told him we could decrease the sampling frequency: to 1st and 3rd Qs. We looked at the gw to air pathway: commercial: benzene is 5,340 ppb 10-6. GW to building pathway: 21 ppb 10-6, or 210 ppb 10-5. JR said that po should be complying w/the regs for UST operation. 2140 ppb @ 15-04

Wrote Letter to RP, allowing decreased frequency of sampling.

5/6/96 spoke w/Rick Pilat: he got my 4/30/96 letter. He has not used the ASTM RBCA Tier 1 before. Looking for more guidance. Has something to fax me. Then we'll talk more about this. Got his fax; it's the same Tier 1 as mine. Told him to use the max gw conc from most recent QR. It's 1,400 ppb benzene for 2/96. It's in RS2. We could use the outdoor air pathway bec another well closer to the bldg is ND (RS3). And using this, we see that 1400 ppb benzene is < 5340 ppb for 10-6, so we're ok on gw for this Q. He said the asphalt is extremely cracked, and gw is only at 5-7' bgs. So we should look at stopping point sources. Told him the high MTBE in RS1 and RS2 concerns me. What % MTBE is in gasoline? It doesn't surprise him. **Then we must look at history of soil sampling and find max soil residual concs.** He can crunch the #s. Told him we use 10-5 and sometimes 10-4 for commercial/industrial sites. This CAP revision should get to me around next QS. Maybe do confirmation punch samples for soil. Asked him to reference the reports he found the soil concs from (ie Table #2).

5/16/96 Alex Escobar from the Money Store phoned. 446-7733. Why cant we close the site? He got my fax. How badly contaminated is this site? When can we close this case? Told him the letter can be considered a promise of closure. Only way he can refinance is if they get a closure ltr. Suggested his bank go out on a limb just one inch.

6/17/96 Reviewed May 1996 "Supplemental RBCA Report" by RSI. They refer to piping samples taken during piping replacement, in the "Soil Sampling Report," by On-Site Technologies, dated 8/31/89. Do we have this? YES. The max soil hit was 8,400 ppm TPHg (8 ppm benzene); it was overexed, and the max hit remaining in place was 3,300 TPHg (ND benzene). Reviewed the 851-A file. Found the 8/31/89 On Site Tech report. The max hits left in place were 0.4 ppm benzene and 400 ppm TPHg, as per LSS notes. Also, I wonder what happened to the SP soil with the 8400 ppm TPHg? Was it offhauled or

6/17/96
con't

returned to the pit? No mention of soil disposal; however, there was no benzene in any of the 3 Sps; max TPHg was 600 ppm. This report said they overexed to 12'bgs and 5' from the tank fill end (3K super unleaded UST). This was done on 7/7 and 8/18 1989. GW was at approx 8.5'bgs in the pit; it had FP. **THE FORMER OPERATOR WAS MR. MOHAMMAD MUSHHOON, 5 ADMIRAL DR, UNIT 301, EMERYVILLE 94608. ISN'T THIS THE SAME GUY THAT DISAPPEARED ON MR. LEONARDINI (333 BROADWAY), OWING HIM MONEY? MAYBE THE CURRENT OPERATOR KNOWS WHERE MR. MUSHHOON IS NOW!?** Issues: 1) no doc of disposal of soil from overexing the super unleaded tank pit in 1989 (although benzene was ND in all 3 SPS); 2) pg 2 of report lists max soil hits encountered at site, but there are 3 errors (as noted in pencil); 3) pg 3 says that "FHCs were ONLY detected in soil beneath the tank on the west portion of the site." False: a) all 4 piping samples taken on 3/22/89 had Hcs, b) all 4 well boreholes had Hcs, and c) waste oil UST was a problem; 4) the GWES on Fig 4 AND on Fig 5 are incorrect; see my corrections in pencil, taken fm last QR; 5) they did a QUALITATIVE RBCA, which is not acceptable. They just assumed the soil volatilization pathways are "insignificant." Thats not good enough. Lets compare Concs to RBSLs. Can we even use the Tier 1? I think not, bec the DTW is only 4.5 to 7.5'bgs (2/96 data). **Did they consider any of this?** 6) why did they use 10-5 on page 10?

*Shawn?
measurable?*

Wrote letter to RP, re the problem w/the 5/96 RSI RBCA report.

8/2/96 received ltr fm RSI, requesting 45 day extension of revised RBCA plan. That makes new date Sept 15.

9/13/96 spoke w/R. Pilat: he spoke w/JR this am. They really dont want to spend any more \$\$\$. So DP doesnt want to do a Tier 2; would appeal our request for Tier 2. Dave Deaners "Common Sense" closure questions. RE #2) They aerated the soil removed during repipe, then took it to the local landfill. He has invoice fm Diablo (contractor) to haul soil (does not say landfill name). Got verbal ok fm L. Seto (based on conversations w/JR). RE #3) contours were ok, but #s were incorrect. **Told him their other option is to continue GW mon.** DP doesnt believe a Tier 2 is necessary or warranted. They say they dont have to do Tier 2 on any other sites, esp in AlCo. They dont believe there is any exposure pathway. I looked at the highest benzene conc: 1400 ppb in RS2. And see how RS2 was the DG MW for the last 2 Qs? GW flowed West, so they may have offsite

*Where did
soil go?*

9/13/96
con't

migration to the West. They resurveyed the MWs to make sure it was correct; probably after 11/95 QS (biannual actually). **I should be asking for an offsite, DG gw invest (to the West).** They should be sampling in the 3rd Q, not the 4th Q. No problem, sez Rick. He will talk to JR about what we talked about. He will respond to my 6/17 ltr. **Also, look at the MTBE concs. Is there an ongoing leak? Are the well caps tight?** The surface of the wells have been smashed. He says the ongoing problem is worse than or equal to any previous problem. We probably need to replace well boxes. DP doesn't own prop anymore. **Please let me know when they will be doing gw sampling. I'd like to check the well boxes, take photos, and prepare my letter.** Maybe Walt Lebke from RSI. I'll pull their inspection file also; the site is covered w/oil. They have dbl wall piping. He thinks the USTs are not up to standard. He has a lot more to talk to JR about now.

Looked at the inspection files. UST file shows that last inspection was 5/96 (I think), however Don Hwang noted that tank testing not occurred since 93. Sharam Shanazzi is new prop owner (since 93). Lm for Don Hwang: can he write RP a letter? Esp bec there does not appear to be any response to his 5/96 inspection report, where he asks for many things within 30 days. I'm concerned that the tank system is leaking, at least MTBE, into the gw. And RP wants closure. It wd be good if Don and I made a concerted effort (2 letters) to Sharam to address these problems. Phoned B. Johnson: have they done a stormwater inspection? Although they are no longer a generator (since they replaced repair garage w/mini mart), they may still have spills from the dispensers. Mess fm DH: he agrees that this needs follow up. He will also check w/KT. Great!

9/17/96 spoke w/George Converse: As per my 6/17 ltr, was there anything else? He will do Tier II, as well as QR this week. JR is apparently turning this over to WEGE. But Rick said DP didn't want to do a Tier II. JR told him to review what Rick submitted, and to find out what data gaps are. JR was upset bec Rick Pilat wasn't sending the drafts over to JR first. They used MTBE as far back as 1985 (Arco), but doesn't know if DP was using it that far back. Used in winter as octane booster. He assumes they resurveyed that site 3 times, (maybe due to construction?). RBCA report shows 3 sets of TOC elevations in Table 1. May 94 was latest change. **Maybe I should ask for monthly GWES and potentiometric maps.** He will be doing work in San Jose monthly or weekly anyway. Matt is doing QR on 9/18 Wed (tomorrow).

- 9/18/96 Site visit to inspect Mws. See Field notes. Met WEGE tech onsite.
- 9/20/96 Shahram phoned: He saw the problem and he shut down the pump. Made damage to the needle. Will repair it. He will not use pump until it is fixed. He will fax me the letter from pump. (What is he talking about?)(I cannot understand most of his message.) Gave copy of message to Don Hwang. Asked Don to contact RP. Spoke w/Shahram: 3 wks ago, someone drove off w/the nozzle. It put a shock on the meter. He put the pressure on the meter inside. (I still don't understand.) He will fax me a copy of the repair bill on Monday.
- 11/7/96 Reviewed 9/17/96 ltr fm RSI. Addresses my 6/17/96 letter. **But their item 3 is not adequate. They did not resubmit amended Figures.** phoned RSI: they close at 5 pm. Lm for Rick Pilat. Questions:
1) what guidance is he referring to on pg 2?
2) they spent \$250,000 on THIS site?
3) he really thinks we should stop monitoring when we have 1,400 ppb benzene?
- 11/8/96 mess fm and to Rick Pilat:
- 11/12/96 spoke w/Rick Pilat: Desert wants to use another consultant on this site. He is saying that the Tier 2 is not economically justified. It is probably moot to continue this discussion w/him, since Desert is changing consultants.
- 12/2/96 mess fm Alex Escobar: He is w/the Money Store: 446-7733. Status of closure? We last spoke 5/96, when I said there was a good possibility.
- 12/10/96 mess to Alex: I am waiting for a Tier 2. Please contact JR for further info.
- 12/26/96 Reviewed 11/5/96 QR by WEGE. **GW sampled on 9/18/96 flowed SW. RS1 had 1" of FP and 160,000 ppb MTBE.** They responded to my 6/17/96 letter re RSI's Supplemental RBCA report. The corrected gw flow direction from 11/95 and 2/96 is south, towards Mtn Blvd. This makes things simpler in terms of not having to evaluate the risk to the residential area to the west of the site. **Starting on 10/1/96, they did weekly purging and venting of RS1 for removal of FP. Also doing periodic purging and venting of RS2 and RS3. They vented out 92 lb of gasoline and 1.32 ft³ of FP, and 450 gal impacted gw. They plan to stop venting on 12/5, then do QS on 12/19.**

12/26/96
con't

Phoned Don Hwang to tell him we have FP and elevated MTBE (160,000 ppb) in RS1 all of a sudden. He got plans fm Shanazzi to install new monitoring system and check on tank lining.

The FP was analyzed; came out as heavy end gasoline range. **What is their "venting" procedure? And what have they done w/the gasoline they recovered? Ie disposal?**

Reviewed 12/10/96 "Workplan to delineate the lateral extent of FP . . .in RS-1" by WEGE. They propose a Soil Probe Survey. They want to use their own lab, which is not state certified. And they will probably want to use these results to base the risk assessment on. No way.

Phoned WEGE to discuss the wp. I dont want to use their non-cert lab, just like I told them on their other site (Park Blvd) by way of ltr dated 10/24/96. Spoke w/George: did they get FP when they did QS in Dec? Yes; thinks it correlates to DTW. All Clay; maybe a silty or sandy area that allowed that gasoline to enter well when gw is high. Venting procedure: deplete well of water, hook up vacuum and measure flow rate in inches of water, just like they did at Park Blvd. Measures vapors w/PID, and if it exceeds action level (around 50 ppm), they shut it down. Below AQMD poundage for the day. They measure not at the vacuum exhaust, but at the "exposure point" ie away from the exhaust. Evergreen offhauled FP and contam gw as HW. They have manifests. We discussed Table 1 of the wp. Why not go offsite right now? Note how there was up to 0.75 FEET of FP in RS1. If results show that FP is thicker closer to the USTs, we may conclude the problem is from tenant. They did some repairs on S side of USTs in 7/89 (see Fig 3); maybe they didnt get it all. #1 they want to define extent of FP (in water, since gw is so shallow). Use flourence for soil sample. #2 try to associate or dissassociate it w/USTs. If its not DPs problem, end of it. #3 get samples outside of FP plume and get an idea of dissolved plume, for future citing of Mws. Would they want to use the non-cert samples for a RA? NO, use MW samples as well as soil samples from any overex around RS1. How will they measure amt of FP in gw esp w/that tubing? They vac it out into a VOA, all the while sounding it. . .mark it, see if it is FP, if so, go down 1/2" and pull up more fluid, keep going until it is water. Same way as sounding a well, except they just "strap" or measure the tubing. FP is degraded gasoline. He got their zone 7 permit. I must write ltr.