

ALAMEDA COUNTY
HEALTH CARE SERVICES



20279

AGENCY

DAVID J. KEARS, Agency Director

July 10, 1996

Mr. Jon Legallet
Telegraph Business Properties
1401 Griffith Street
San Francisco, California 94124

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

RE: **Telegraph Business Park (STID #3160)**
5427 Telegraph Avenue, Oakland, CA 94609

Dear Mr. Legallet:

This office has recently reviewed the case file regarding the removal of seventeen underground storage tanks at the above referenced site. A meeting with your consultants, John Trigg and Jim Green of Sierra Environmental Services (SES) was held today to discuss the proposed interim groundwater remediation system and the status of the site.

A preliminary site assessment was conducted on December 1993 where three groundwater monitoring wells were installed and nine borings (B-1 to B-9) were drilled on site. The wells has been monitored consistently every quarter since 1/5/94 and the latest sampling event occurred on 4/26/96. Results indicate the presence of dissolved petroleum hydrocarbon in all the wells. Further site characterization was conducted by drilling five borings (B-10 to B-14) on site and three downgradient borings (B-15 to B-17) off site on 11/94 and 1/95 respectively. PCE has been detected in the grab water sample collected from borings B-16 (290 ppb) and B-53 (53 ppb). Stoddard solvent (SS) was also found in the grab water sample collected from the downgradient off site boring B-15 at 9100 ppb.

The following issues must be addressed regarding the investigation / remediation at the subject site:

- 1) The extent of the soil/groundwater contamination remains undefined. In order to delineate the extent of the plume, sampling points downgradient of MW-2 (81,000 ppb SS), B-2 (400,000 ppb SS), B-17 (53 ppb PCE), B-16 (290 ppb PCE), B-15 (9100 ppb SS) and upgradient of B-10 (120,000 ppb SS), B-6 (9000 ppb SS), B-7 (18,000 SS), B-3 (780,000 ppb SS) are required. Please submit a work plan to characterize the extent of the plume.
- 2) Chlorinated solvents had been detected at two neighboring sites (ARCO Station located at 5131 Shattuck Avenue and the former Chevron Station located at 5101 Telegraph Avenue) which are downgradient of the subject property. Please provide our office with additional data that has been collected or will be collected to document that the chlorinated solvent plume from the subject site is not migrating off site.

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- 3) The three wells at the site must be monitored every quarter and samples must be analyzed for the following target compounds: TPH gasoline, TPH diesel, TPH stoddard solvent, BTEX, and chlorinated solvents. The groundwater monitoring program will be modified in the future.
- 4) Please submit copies of the boring logs for borings B-1 to B-9 which are missing from the SES's Subsurface Investigation Report dated April 15, 1994.
- 5) The practical quantitation reporting limits of 0.5 ppb (not 250 ppb) for BTEX in water should be used.
- 6) Implementation of the proposed groundwater remediation system should be evaluated based on the following criteria:
 - plume is migrating off site and hydraulic control of the plume (containment) is necessary
 - sensitive receptors have been identified and likely to be adversely impacted
 - cost effectiveness of the chosen remediation treatment

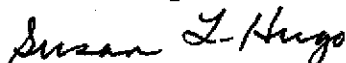
In order to facilitate site closure, the subject site should be considered as a low risk site using the following criteria:

- a) The leak has been stopped and ongoing sources, including free product, removed or remediated.
- b) The site has been adequately characterized.
- c) The dissolved hydrocarbon plume is not migrating.
- d) No water wells, deeper drinking water aquifers, surface water, or other sensitive receptors are likely to be impacted.
- e) The site presents no significant risk to human health, safety and the environment.

Response to issues #1 through #6 must be submitted to this office no later than August 26, 1996.

You may reach me at (510) 567-6780 for any questions you may have concerning this letter.

Sincerely,



Susan L. Hugo, Sr. Hazardous Materials Specialist

c: Mee Ling Tung, Director, Environmental Health
Gordon Coleman, Acting Chief, Environmental Protection / files
Kevin Graves, San Francisco Bay RWQCB
John Trigg, SES, P.O. Box 2546, Martinez, CA 94553

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

November 4, 1993
STID# 3160

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

R0279

Mr. Jon Legallet
Telegraph Business Properties
1401 Griffith Street
San Francisco, California 94124

**RE: Subsurface Investigation Work Plan
Telegraph Business Park
5427 Telegraph Avenue, Oakland, California 94609**

Dear Mr. Legallet:

The Alameda County Department of Environmental Health, Hazardous Materials Division has recently reviewed the Subsurface Investigation Work Plan (May 11, 1993) prepared by Sierra Environmental Services for the referenced site.

Based on this review, the work plan is acceptable provided the following items are addressed:

- 1) Elevated levels of petroleum hydrocarbon were detected at the site. The impact to groundwater of the unauthorized release from the former tanks must be investigated. Groundwater monitoring wells must be installed and gradient direction must be established at the site. Please submit an addendum to the work plan to include the installation of three monitoring wells, site map showing the locations of the wells and a copy of the monitoring well construction diagrams.
- 2) Construction and placement of the wells must adhere to the requirements specified in "Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites", August, 1990. Monitoring wells must be screened to intercept free floating product and accommodate seasonal water table fluctuations.
- 3) Soil samples from borings must be collected every five feet as per RWQCB's guidelines. Field instruments are acceptable as a screening tools only. Any evidence of soil contamination such as odor, visual staining or field instrument readings must be verified by analysis from a state certified laboratory.
- 4) Groundwater elevation readings must be performed every month for six consecutive months and reduced to every quarter after the first six months. Groundwater monitoring wells must be sampled on a quarterly basis and analyzed for the following target compounds: TPH gasoline, TPH diesel, benzene, toluene, ethyl benzene, xylene, stoddard solvent, oil & grease and halogenated hydrocarbons.

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- 5) Copies of manifests for the disposal of the tanks and records of stockpiled soil disposition must be submitted to this office.
- 6) Please notify this office at least 48 hours in advance for the start up of work plan implementation so a site visit can be arranged by a representative from this office.

Items 1 and 5 must be submitted to this office no later than December 6, 1993.

A report must be submitted within **45 days** after completion of this investigation. Until cleanup is complete, you will need to submit reports to this office every three months or at a more frequent interval, if specified at any time. In addition, the following items must be incorporated in your future reports or workplans:

- a cover letter from the responsible party or tank owner stating the accuracy of the report and whether he/she concurs with the conclusions and recommendations in the report or workplan
- site map delineating contamination contours for soil and groundwater based on recent data should be included and the status of the investigation and cleanup must be identified
- proposed continuing or next phase of investigation / cleanup activities must be included to inform this department or the RWQCB of the responsible party or tank owner's intention
- any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained
- historical records of groundwater level in each well must be tabulated to indicate the fluctuation in water levels
- tabulate analytical results from all previous sampling events; provide laboratory reports (including quality control/quality assurance) and chain of custody documentation

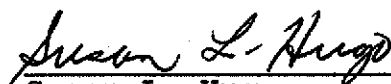
All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project.

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Because we are overseeing this site under the designated authority of the Regional Water Quality Control Board, this letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency.

Please contact me at (510) 271-4530 if you have any questions concerning this letter.

Sincerely,



Susan L. Hugo
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health
Rich Hiett, San Francisco Bay RWQCB
Edgar B. Howell, Chief, Hazardous Materials Division - files
Chris Bramer, Sierra Environmental Services
P.O. Box 2546 , Martinez, California 94553

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0279

March 29, 1993
STID# 3160

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. Jon Legallet
Telegraph Business Properties
1401 Griffith Street
San Francisco, California 94124

**RE: Removal of Seventeen Underground Storage Tanks at Telegraph
Business Park, 5427 Telegraph Avenue, Oakland, CA 94609**

Dear Mr. Legallet:

The Alameda County Department of Environmental Health, Hazardous Materials Division has reviewed the files concerning the removal of seventeen underground storage tanks (ten stoddard solvent tanks, five stoddard solvent waste tanks, one diesel tank, and one unleaded gasoline tank) on April 30, 1992 through May 22, 1992 at the referenced site. We are in receipt of the "Tank Pull/Excavation Activities Report" prepared by Sierra Environmental Services and the "Underground Storage Tank Unauthorized Release (Leak)/Contamination Site Report".

Soil samples collected beneath the tank areas showed elevated levels of Total Petroleum Hydrocarbon as diesel (260 ppm), Total Oil and Grease (2,285 ppm) and Stoddard solvent (1,720 ppm). In addition, elevated levels of purgeable halocarbons (210 ppm PCE and 35 ppm TCE) were detected underneath the solvent waste oil tank. Because of the degree of contamination found at the site which exceeded regulatory threshold levels, further environmental assessment is required to determine the extent of the unauthorized release associated with the former tanks at the site.

This office will be the lead agency overseeing the environmental investigation and cleanup activities at the site. The RWQCB has delegated this authority to our office. However, you must keep the Water Board apprised of all actions taken to characterize and remediate contamination at the site, because the Board retains the ultimate responsibility for ensuring protection of the waters of the state.

A preliminary assessment should be conducted to determine the extent of soil and/or groundwater contamination that has resulted from the former leaking tank. The information gathered by this investigation will be used to assess the need for additional actions at the site. The preliminary assessment should be designed to provide all of the information in the format shown in the

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attachment at the end of this letter, which is based on the RWQCB's guidelines. You should be prepared to install at a minimum, three monitoring wells to establish gradient direction of the groundwater at the site. One of the wells should be installed within 10 feet downgradient of the former tank location. Monthly water elevation reading for twelve months is necessary to determine groundwater flow direction and quarterly sampling must occur to determine extent of the groundwater contamination.

Until cleanup is complete, you will need to submit reports to this office and to RWQCB every three months (or at a more frequent interval, if specified at any time by either agency). These reports must include information pertaining to further investigative results; the methods of cleanup actions implemented to date; and the method and disposal of any contaminated material. Copies of manifests for such disposal must be sent to this office. Stockpiled soil from the pit may not be used to backfill these holes without authorization from this office. Only clean fill can be used to backfill the excavation pit. Please provide our office with documentation of the stockpiled soil disposal and the manifests for the seventeen underground storage tanks disposal.

Your work plan must be submitted to this office no later than **May 14, 1993**. All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project. Copies of the reports and proposals must also be submitted to:

Rich Hiett
RWQCB, San Francisco Bay Region
2101 Webster Street, Fourth Floor
Oakland, California 94612

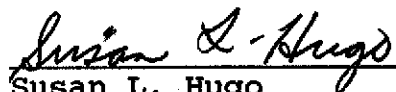
Because we are overseeing this site under the designated authority of the Regional Water Quality Control Board, this letter constitutes a formal requests for technical reports pursuant to California Water Code Section 13267(b). Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency or RWQCB.

Mr. Jon Legallet
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March 29, 1993
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Enclosed is a copy of Appendix A (Workplan for Initial Subsurface Investigation (August 20, 1991) for your reference.

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

Sincerely,



Susan L. Hugo
Senior Hazardous Materials Specialist

Enclosures

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health
Rich Hiett, San Francisco Bay RWQCB
Gil Jensen, Alameda County District Attorney's Office
Edgar B. Howell, Chief, Hazardous Materials Division / file
Chris Bramer, Sierra Environmental Services, P.O. Box 2546
Martinez, California 94553