

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



07-11-02

July 10, 2002

RO0000340

Mr. Paul Mazza
San Francisco Public Utilities Commission
1000 El Camino Real
Millbrae, CA 94030

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

RE: San Francisco Water Department, Sunol Pump Station, 505 Paloma Way, Sunol, Alameda County – Soil and Water Investigation Workplan

Dear Mr. Mazza:

I have completed review of the March 13, 2002 Weiss Associates (WA) soil and water investigation (SWI) workplan for the subject San Francisco Water Department (SFWD), Sunol Pump Station. The WA workplan calls for the installation of three (3) temporary sampling points at the site, and the collection of both soil and groundwater samples from each.

The cited WA workplan is accepted as submitted with the following clarifications:

1. Semi-Volatile Organic Compounds (SVOC), and Oil & Grease, are to be added to the proposed suite of sample analyses.
2. EPA Method 8260 is to be used for methyl tert-butyl ether (MtBE) confirmation.
3. An additional sample point is to be added just West of the former waste and lube oil tanks (in the area of former CDM boring BH-6), in addition to another sample point to be added midway between the former waste and lube oil tanks cluster, and the former 10,000 fuel tank (in the area of CDM boring BH-4).

This workplan is to be implemented within 60 days of the date of this letter.

Please call me at (510) 567-6783 to advise when field work has been scheduled.

Sincerely,


Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Mat Katen, Zone 7 Water Agency, 5997 Parkside Dr., Pleasanton, CA 94588-5127
Randall Smith, S.F. Public Utilities Commission, 3801 Third St., Ste. 600, S.F., CA 94124
Melissa Tumbleson, Weiss Assoc., 5801 Christie Ave., Ste. 600, Emeryville, CA 94608-1827

ALAMEDA COUNTY
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



07-11-02

July 10, 2002

RO0000340

Mr. Paul Mazza
San Francisco Public Utilities Commission
1000 El Camino Real
Millbrae, CA 94030

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

RE: San Francisco Water Department, Sunol Maintenance Yard, 505 Paloma Way, Sunol, Alameda County – Soil and Water Investigation Workplan

Dear Mr. Mazza:

I have completed review of the March 13, 2002 Weiss Associates (WA) soil and water investigation (SWI) workplan for the subject San Francisco Water Department (SFWD), Sunol Maintenance Yard. The WA workplan calls for the installation of four (4) temporary sampling points at the site, the collection of both soil and groundwater samples from each, and the collection of a water sample from (existing) well MW-1.

The cited WA workplan is accepted as submitted with the following clarifications:

1. Analyses for Total Petroleum Hydrocarbons as gasoline (TPH-g) is to be added to the proposed suite of analyses.
2. EPA Method 8260 is to be used for methyl tert-butyl ether (MtBE) confirmation
3. EPA Methods 8010, 8240 or 8260 are to be used for HVOC analyses, not 8021B as proposed

This workplan is to be implemented within 60 days of the date of this letter.

Please call me at (510) 567-6783 to advise when field work has been scheduled.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Mat Katen, Zone 7 Water Agency, 5997 Parkside Dr., Pleasanton, CA 94588-5127
Randall Smith, S.F. Public Utilities Commission, 3801 Third St., Ste. 600, S.F., CA 94124
Melissa Tumbleson, Weiss Assoc., 5801 Christie Ave., Ste. 600, Emeryville, CA 94608-1827

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0340

December 28, 2001

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

Mr. Randall D. Smith
Regulatory Specialist
San Francisco Public Utilities Commission
Bureau of Environmental Regulation and Management
3801 3rd Street, Suite 600
San Francisco, California 94124

Re: SFWD Alameda Operation & Maintenance Yard, 505 Paloma Way, Sunol

Dear Mr. Smith:

I am writing this letter to explain the authority and lead agency roles carried out by this office in order to facilitate the construction upgrades and repairs to the two underground storage tanks at the above site. In 1997 this office was authorized by Cal EPA as a Certified Unified Program Agency (CUPA). As a CUPA we carry out regulatory compliance in three major programs: underground storage tanks, hazardous waste generators and hazardous materials business plans.

The geographic area of responsibility for regulatory compliance is in the unincorporated areas of Alameda County and the cities of Albany, Emeryville, Alameda, and Dublin. This office has been the oversight Agency for the Alameda Operations & Maintenance Yard since the inception of the laws and regulations governing underground tanks and hazardous waste generators.

Additionally, the California State Water Resources Control Board has delegated authority to this office for the oversight of site remediation at facilities where a release has occurred from an underground storage tank. Staff from this office has had a continuing involvement in both site remediation and ongoing operation of underground storage tanks at the Alameda Operations & Maintenance Yard.

The upgrade work proposed for the Paloma facility is consistent with work being performed at sites through out the state to upgrade old equipment to meet new requirements. This office strongly recommends that the upgrade work be carried out as soon as possible.

Please contact me at (510) 567-6781 if you need additional information regarding these issues.

Sincerely,

Robert Weston
Sr. Hazardous Materials Specialist

c: Susan Hugo, Manager, ACDEH

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



~~12-18-00~~

20340

December 13, 2000

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

STID 3118

Johnie Wong
Utility Plumber Supervisor
San Francisco Water Department
Water Supply and Treatment Division
P. O. Box 730
Millbrae, California 94030

Re: Inspection of underground storage tanks, Alameda Operation & Maintenance
Yard, 505 Paloma Way, Sunol, California 94586

Dear Mr. Wong:

A regulatory compliance inspection was performed at the subject facility on October 25, 2000. You and your staff facilitated the inspection. The purpose of the inspection was to determine compliance with conditions of the facility underground storage tank (UST) operating permit, as well as provisions of Title 23, California Code of Regulations (CCR) and California Health and Safety Code (HSC) Chapter 6.7.

The following is a summary of non-compliant and other conditions noted at the time of the inspection:

- All bolt down steel covers on the access casings are to be maintained as the manufacturer designed and intended. All covers shall be bolted and include rubber gaskets. The covers are required as designed to keep surface runoff from contaminating the subsurface.
- We discovered that the ball float vent valves (BFVVs) are present in the vent line extractor housings. The special tools needed to remove the BFVVs were not available during the inspection. It is required that your contractor performs the removal. Presence of both BFVVs and the positive shut off drop tube in the tank can cause a malfunction of the shut off mechanism and result in overfilling the tank.
- We also determined that the fuel dispensers do not have dispenser containment to capture leaks and spills from the piping and suction pump mechanism. Dispenser

containment is required to be installed not later than December 31, 2003. As we discussed, the secondary containment for the dispensers would be a benefit for ground water protection if installed as soon as possible. We know from other fuel tank sites that leaks at the dispensers can be a significant source of soil and ground water contamination.

At this time, you are required to correct the tank system operation and maintenance issues identified in this inspection report, namely:

- Correct the operation and maintenance problems identified during the October 25, 2000 inspection.
- Provide the updated *Certification of Financial Responsibility* documents needed to verify compliance with permit conditions.
- Review, sign and return updated facility permit forms.
- Update the spill release response plan to include your name as contact person.

Pursuant to HSC Sec. 25288(d), you are required to submit a *Plan of Correction* within 60 days. This plan shall indicate the tasks to be completed, or those that have been completed already, and the schedule for doing so.

You must certify, once all the necessary repairs and other tasks have been completed, that the tank system is in full compliance with HSC Chapter 6.7 and UST regulations. We recommend that you call for a follow-up inspection if necessary.

Please contact me at (510) 567-6781 should you have any questions about the content of this letter.

Sincerely,



Robert Weston
Sr. Hazardous Materials Specialist

enclosures

c: Tom Peacock, ACDEH

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

R0340

STID 3118

January 18, 1995

Mr. Paul Mazza
San Francisco Water Department
10000 El Camino Real
Millbrae, CA 94030

ALAMEDA COUNTY ENV. HEALTH DEPT.
ENVIRONMENTAL PROTECTION DIVISION
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577
(510)567-6700

RE: SOIL REMEDIATION AND MONITORING WELL INSTALLATION PLANS -
SUNOL PUMP STATION, 505 PALOMA WAY, SUNOL

Dear Mr. Mazza:

I have consulted with the San Francisco Bay Regional Water Quality Control Board (RWQCB) regarding the need to apply risk-based cleanup criteria at the referenced site. Dr. Ravi Arulanantham of the RWQCB has concluded that the magnitude of any residual soil contamination at the site would not warrant a detailed risk assessment.

Therefore, based on the aforementioned RWQCB determination and a January 17, 1995 conversation with Mr. Ben Swann (CDM), the July 19, 1994 Camp, Dresser & McKee, Inc. (CDM) soil remediation and monitoring well installation work plan has been accepted with the following minor revisions:

- 1) The number and location of final confirmatory soil samples collected from the resulting excavation should be significantly based on what is observed in the field during excavation, and on analytical data from previous phases of work at the site (e.g., soil borings).

At a minimum, the collection of four (4) or more bottom samples and at least one (1) sidewall sample from each wall of the excavation (~ 1 per 20 ft²), targeting former "hot" areas, would appear appropriate.

- 2) All final soil samples should also be analyzed for BTEX, in addition to method 418.1 and TPH-D analyses as proposed.

Additionally, PNA analyses should also be performed not only on final samples collected from the excavation's base, but also on that (those) sidewall sample(s) collected proximal to the location of the former waste oil UST.

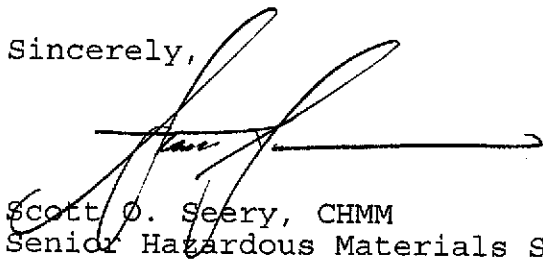
- 3) Once the locations of the monitoring wells have been determined and the wells constructed, ground water samples should also be analyzed for the presence of PNAs, in addition to the target analytes proposed (TPH-D and BTEX).

Mr. Paul Mazza
RE: Sunol Pump Plant, 505 Paloma Way, Sunol
January 18, 1995
Page 2 of 2

Please incorporate the final well placement proposal into the report presenting the results of the excavation activities.

Please contact this office when field work has been scheduled, or if there should be any questions. I may be reached at 510/567-6783.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director
Gil Jensen, Alameda County District Attorney's Office
Ravi Arulanantham, RWQCB
Ed Laudani, Alameda County Fire Department
Kevin Tinsley, ACDEH
Bob Hickman, SFWD, P.O. Box 730, Millbrae, CA 94030
Ben Swann, Camp, Dresser & McKee

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0340

RAFAT A. SHAHID, Assistant Agency Director

STID 3118

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

July 22, 1994

Ravi Arulanantham, PhD., CHMM
California Regional Water Quality Control Board
San Francisco Bay Region
2101 Webster Street, Ste. 500
Oakland, CA 94612

RE: SAN FRANCISCO WATER DEPARTMENT, SUNOL PUMP STATION, 505
PALOMA WAY, SUNOL, ALAMEDA COUNTY: ESTABLISHMENT OF RISK-
BASED CLEANUP LEVELS

Dear Dr. Arulanantham:

This letter follows our telephone conversation on July 20th during which we discussed the potential applicability of human health-based risk assessment to aid in the establishment of appropriate cleanup levels for soil contaminated from underground storage tank (UST) release(s) at the referenced subsite. The county requests your assistance in determining whether such a risk assessment is warranted.

Attached please find copies of background documents, including, but not necessarily limited to:

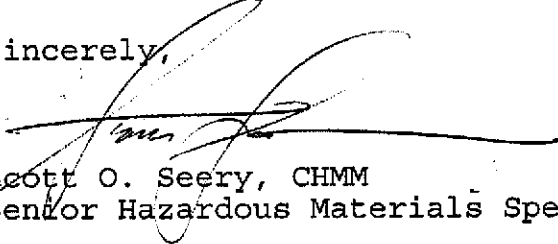
- o July 19, 1994 Camp, Dresser & McKee (CDM) *Remediation and Groundwater Monitoring of Former UST Location, Sunol Pump Plant* (complete)
- o March 1994 CDM UST removal report (excerpts)
- o August 1993 CDM *Report of Soil Boring Assessment at Sunol Pump Station* (complete)
- o Tabulation of UST closure soil sample results

Please be aware that this subsite is located at the head of Niles Canyon within a portion of the Sunol ground water subbasin, directly proximal to the confluence of Alameda Creek and Arroyo de la Laguna, a tributary to Alameda Creek. This alluvial basin is an area where percolation and infiltration of irrigation water, precipitation, and stream flow provide significant recharge to the underlying aquifer. Water destined for domestic use is periodically extracted at the Sunol filter gallery, which the subject pump plant serves. Effluent flow into Alameda Creek helps to recharge ground water reservoirs underlying the Niles cone at its apex in the vicinity of the Niles district of Fremont.

Dr. Arulanantham
RE: SFWD, 505 Paloma Way, Sunol
July 22, 1994
Page 2 of 2

I understand that you will require approximately 2 weeks to evaluate these data. Please call me at 510/337-2853, or -2866, should you have any questions or care to discuss this case during the course of your evaluation.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

attachments

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Kevin Graves, RWQCB
Paul Mazza, SFWD
Ben Swann, CDM

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0340

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

STID 3118

May 27, 1994

Mr. David Wells
City and County of San Francisco
Department of Public Health
Toxics and Safety Services
101 Grove Street
San Francisco, CA 94102

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

RE: SUNOL MAINTENANCE YARD, 505 PALOMA WAY, SUNOL

Dear Mr. Wells:

It has come to our attention that reports documenting the results of the ongoing ground water investigation at the referenced Alameda County site have not been submitted to this office since our receipt of the December 2, 1992 Crosby & Overton monitoring report. Hence, no reports have been submitted for all of 1993 and the first quarter of 1994. Please be advised that this is a violation of Section 2652(d) of Title 23, California Code of Regulations.

Your attention is directed towards the August 16, 1991 and January 22, 1992 correspondence from this office in which, among other topics discussed, it is requested that such technical reports be submitted on a quarterly basis. Copies of the cited letters are attached for your review.

Please submit all sampling and monitoring reports for the referenced site within 30 days of the date of this letter.

Please be advised that this letter constitutes a request for technical reports pursuant to California Water Code Section 13267(b).

I may be reached at 510/271-4530 should you have any questions.

Sincerely,


Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Ed Laudani, Alameda County Fire Department
Paul Mazza, SFWD
Ronald Krzyzanowski, SFWD

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0340

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

STID 3118

May 27, 1994

Mr. Ronald Krzyzanowski
City and County of San Francisco
Department of Public Works
Bureau of Environmental Regulation & Management
Bayview Plaza
3801 Third Street, Ste. 600
San Francisco, CA 94124

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

RE: SUNOL PUMP STATION, 505 PALOMA WAY, SUNOL

Dear Mr. Krzyzanowski:

This office is in receipt and has completed review of the March 1994 Camp, Dresser & McKee Inc. (CDM) *Sunol Pump Station Underground Storage Tank Removal Report*, as submitted under CDM cover dated March 10, 1994, and the August 1993 CDM *Report of Soil Boring Assessment at Sunol Pump Station, Alameda County, California*, submitted as an enclosure within the cited March 1994 CDM closure report. The cited reports document that a release of fuel and non-fuel hydrocarbons has impacted both soil and ground water encountered at this site.

Please be advised that the San Francisco Bay Regional Water Quality Control Board (RWQCB), and the Corrective Action Regulations, Article 11, Title 23, California Code of Regulations (CCR), require additional environmental investigations to be performed when unauthorized releases are discovered. The initial investigation is in the form of a **Preliminary Site Assessment**, or PSA. The information gathered by the PSA is used to determine the extent of the environmental impact resulting from the release, and whether further assessment or cleanup are necessary. A PSA must be conducted in accordance with the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, the State Water Resources Control Board (SWRCB) Leaking Underground Fuel Tank (LUFT) Field Manual, and Article 11 of 23CCR.

A PSA is required at this site.

In order to proceed with a PSA, you should obtain the professional services of a reputable environmental consultant. Your responsibility is to have the consultant submit a PSA work plan outlining planned activities pertinent to meeting the criteria described in the referenced guidance documents. These criteria are broadly outlined in the attached **Appendix A** from the RWQCB.

Mr. Ronald Krzyzanowski
RE: Sunol Pump Station, 505 Paloma Way, Sunol
May 27, 1994
Page 2 of 3

This Department, through an agreement with the RWQCB, will oversee the assessment and remediation of your site as the lead agency. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. The RWQCB may choose to take over as lead agency if it is determined following the completion of the initial assessment that there has been a substantial impact to ground water.

The PSA work plan is due within 45 days of the date of this letter, or by July 11, 1994. Work should commence no later than 30 days following work plan approval.

A report must be submitted within **45 days** of the completion of field activities associated with this phase of work at the site. Subsequent reports are to be submitted **quarterly** until this site qualifies for final RWQCB "sign off."

The referenced initial and quarterly reports must describe the status of the investigation and include, among other elements, the following:

- o Details and results of all work performed during the designated reporting period: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed (including QA/QC data), tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of ground water contamination and characterization
- o Interpretation of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target compound, geologic cross sections, etc.
- o Recommendations for additional work

All reports and proposals must be submitted under seal of a California-registered geologist or civil engineer with the appropriate environmental background. Please include a statement of qualifications for each lead professional involved with this project.

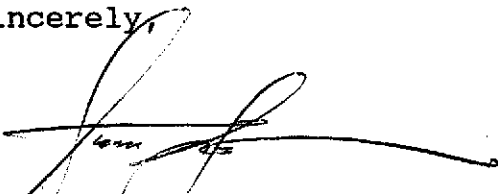
Mr. Ronald Krzyzanowski
RE: Sunol Pump Station, 505 Paloma Way, Sunol
May 27, 1994
Page 3 of 3

Please find attached the State Water Resources Control Board (SWRCB) notification form to be used for notifying the SWRCB of the release at this subsite. Please supply the information requested in this notification form and return to this office within 15 days, should one not have been submitted previously.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Failure to respond may result in the referral of this case to the RWQCB or other appropriate agency for enforcement action.

Please feel free to call me at 510/271-4530, should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott O. Seery', with a long horizontal flourish extending to the right.

Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

attachments

cc: Rafat A. Shahid, Assistant Agency Director, Env. Health
Gil Jensen, Alameda County District Attorney's Office
Ed Laudani, Alameda County Fire Department
Kevin Tinsley, ACDEH
Paul Mazza, SFWD

ALAMEDA COUNTY
HEALTH CARE SERVICE

AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

R0340

December 14, 1993

Ron Carlin
San Francisco Water Dept
P O Box 429
Sunol CA 94586

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

Re: FIVE-YEAR PERMIT FOR OPERATION OF SUNOL PUMP STATION 505
PALOMA RD SUNOL

Dear Mr Carlin:

According to our records your facility referenced above has not received a five-year permit to operate UST's. In order to obtain a permit you must complete the following items marked below and return them within 30 DAYS. The necessary forms are enclosed. You may complete a "Consolidated Underground Tank Management Plan" which will assist you in preparing a monitoring plan, site plot plan and spill response plan for your tank(s). If supplemental information or forms are required, please submit it to this office with the completed questionnaire and application forms:

- 1. An accurate and complete plot plan.
- 2. A written spill response plan. (enclosed)
- 3. A written tank monitoring plan. (enclosed)
- 4. Results of precision tank test(s) (initial and annual).
- 5. Results of precision pipeline leak detector tests (initial and annual).
- 6. Complete UST PERMIT FORM A-one per facility. (enclosed)
- 7. Complete UST PERMIT FORM B-one per tank. (enclosed)
- 8. Complete UST PERMIT FORM C-one per tank if information is available. (enclosed)
- 9. Letter stating how the tank is to be maintained during one year closure.

Be advised that Title 23 of the California Code of Regulation prohibits the operation of ANY UST without a permit. If our records are in error, you must contact this office immediately to avoid possible enforcement action. Please feel free to contact me at (510) 271-4320; to answer any questions which may arise in completing the mandatory five-year permit process.

Sincerely,

Kevin Tinsley
Kevin Tinsley
Hazardous Materials Specialist

c: Edgar Howell, Chief, Hazardous Materials Division (KT-files)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0340

RAFAT A. SHAHID, Assistant Agency Director

October 2, 1992

Ron Carlins
SFWD Sunol Pumping Station
505 Paloma Way
Sunol, CA 94586

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

**Re: FIVE-YEAR PERMITS FOR OPERATION OF UNDERGROUND STORAGE
TANK(S) [USTs] AT 505 Paloma Way, Sunol**


This is in regard to a letter which was sent to you in the past. In that letter you were asked to submit to this office all pertinent information regarding your underground storage tank(s). This information is necessary for permitting of your tanks. To this date this office has not received any response from you. Please complete the following items and return them to me within 30 days:

1. Complete UST PERMIT FORM A-one per facility.
2. Complete UST PERMIT FORM B-one per tank.
3. Complete UST PERMIT FORM C-one per tank if information is available.
4. A written tank monitoring plan.
5. Results of precision tank test(s) (initial and annual).
6. Results of precision pipeline leak detector tests (initial and annual).
7. An accurate and complete plot plan.
8. A written spill response plan.
9. A copy of your inventory reconciliation statement for this year which indicates that all of your inventory reconciliation data are within "allowable variations" or which indicates a list of the periods of times and the corresponding variations when the allowable variation is exceeded. Allowable variation is 1% of the monthly deliveries plus 130 Gallons. Item 9 is necessary only if inventory reconciliation is used to monitor your tank(s).

Forms A, B, and C as well as examples of items 4, 7, and 8 indicated above were provided to you in the first letter.

Please be advised that Title 23 of the California Code of Regulation prohibits the operation of ANY UST without a permit. Please feel free to contact me at (510) 271-4320, if you have any questions regarding the mandatory five-year permit process.

Sincerely,


Amir K. Gholami, REHS
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0340

RAFAT A. SHAHID, Assistant Agency Director

May 1, 1992

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

Mr. Ron Carlins
Sunol Yard
505 Paloma Way
Sunol, Ca 94586

Re: **FIVE-YEAR PERMITS FOR OPERATION OF THREE
UNDERGROUND STORAGE TANKS (UST'S) AT 505
PALOMA WAY SUNOL**

According to our records the above mentioned facility has not received a five-year permit to operate UST's. Please complete the following items marked below and return them to me within 30 days. The example plans enclosed, should be used only as guidelines and may not meet your requirements under Title 23.

- 1. Complete UST PERMIT FORM A-one per facility. (enclosed)
- 2. Complete UST PERMIT FORM B-one per tank. (enclosed)
- 3. Complete UST PERMIT FORM C-one per tank if information is available. (enclosed)
- 4. A written tank monitoring plan. (enclosed)
- 5. Results of precision tank test(s) (initial and annual).
- 6. Results of precision pipeline leak detector tests (initial and annual).
- 7. An accurate and complete plot plan. (enclosed)
- 8. A written spill response plan. (enclosed)

Title 23 of the California Code of Regulation prohibits the operation of ANY UST without a permit. Please feel free to contact Amir K. Gholami at (510) 271-4320, if you have any questions which may arise in completing the mandatory five-year permit process.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. Arulanantham".

Ravi Arulanantham
Senior Hazardous Materials Specialist
(5YR)

cc: Gil Jensen, Alameda County District Attorney
Rafat Shahid, Assistant Agency Director, Alameda
County Department of Environmental Health

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

R0340

January 22, 1992

DEPARTMENT OF ENVIRONMENTAL HEALTH
80 Swan Way, Rm. 210
Oakland, CA 94621
(415) 271-4300

Mr. David Wells
City and County of San Francisco
Department of Public Health
101 Grove Street
San Francisco, CA 94102

RE: SFWO SUNOL YARD HEADQUARTERS, 505 PALOMA WAY, SUNOL, ALAMEDA COUNTY

Dear Mr. Wells:

This Department is in receipt and has completed review of the November 14, 1991 Harding Lawson and Associates (HLA) report entitled "Phase I Soil and Groundwater Investigation, San Francisco Water Department Sunol Yard, 505 Paloma Way, Sunol, California." In general, this report documents the installation of three (3) ground water monitoring wells, results of the sampling and analyses of soil and ground water, and ground water gradient determinations.

Soil samples collected during boring advancement were analyzed for specific target compounds based upon each boring's proximity to a suspected source area shown in previous work to be impacted by a particular suite of contaminants. Hence, target compounds for samples collected from one boring were not necessarily those sought for samples collected from another. Ground water analyses mirrored those for soil samples collected from their respective borings during advancement.

Laboratory results indicate that soil collected from boring B-3 (MW-3) at the depth of 20 feet below grade (BG) exhibited the highest concentration of contaminants in any samples collected from the other two borings. Total petroleum hydrocarbons (TPH), characterized as motor oil, total oil and grease (TOG), and total recoverable hydrocarbons (TRH) were found at concentrations of 203, 213, and 181 parts per million (ppm), respectively. Toluene was also detected in this sample at a concentration of 124 parts per billion (ppb). According to the cited HLA report, this sample depth is within the approximate zone of expected ground water fluctuation.

Wells MW-1 and -2 are located within 10 feet of their expected source areas, the former oil spill and UST sites, respectively. During development of this project, both MW-1 and -2 were sited in the presumed downgradient position of their respective source areas, based upon the site's location relative to the confluence of Arroyo de la Laguna and Alameda Creek. Well MW-3 was located in an area thought to be far downgradient of both source areas.

Mr. David Wells
RE: SFWD, 505 Paloma Way, Sunol
January 22, 1992
Page 2 of 3

Ground water elevations measured during August and September 1991 indicate flow is towards the south-southwest. Hence, based solely upon these two ground water elevation measurements, none of the wells appear to be downgradient of their intended source areas. However, well MW-1 does appear to be somewhat downgradient of the former underground storage tank (UST) site.

The current placement of wells at this site does present a distinct problem: wells MW-1 and -2 are not located within 10 feet and in the confirmed downgradient position of either the former oil spill area or UST site per RWQCB requirements; MW-3 is located up- rather than downgradient of the site, as intended. MW-1 is somewhat downgradient of one source area, but is approximately 60 feet away. The need to install appropriate downgradient wells does present itself.

However, the cited HIA report does argue that, because of the relatively flat ground water gradient, ground water gradient determinations may require additional rounds of data collection before absolute confirmation may be made. We concur with this position.

At this time please adhere to the following sampling and monitoring schedule:

- 1) Ground water samples are to be collected quarterly. Samples shall be analyzed according to the following modified approach:
 - MW-1 TPH-G/D, VOC, TOG (EPA 5520 series)
 - MW-2 TPH-G/D, BTEX, TOG (EPA 5520 series)
 - MW-3 TPH-G/D, VOC, TOG (EPA 5520 series)
- 2) Ground water elevations shall be measured monthly, as previously indicated in this department's August 16, 1991 correspondence. Ground water elevations shall be presented both in tabular fashion and on site gradient maps.

Please continue to submit summary reports on a quarterly basis. Such reports are due the first day of the second month of each subsequent quarter (i.e., August 1, November 1, February 1, and May 1). Hence, the next report is due February 1, 1992, and shall document site activities occurring during the 4th quarter of 1991.

Mr. David Wells
RE: SFWD, 505 Paloma Way, Sunol
January 22, 1992
Page 3 of 3

After the collection and analysis of several more months worth of gradient information, the decision for the installation of additional wells will be made.

Please call me at 510/271-4320 should you have any questions or comments.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Howard Hatayama, DTSC
Ed Stewart, SFWD
Suresh Patel, SF Utilities Engineering Bureau
Jeff Ludlow, HLA

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0340

August 16, 1991

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

Mr. David Wells
City and County of San Francisco
Department of Public Health
101 Grove Street
San Francisco, CA 94102

RE: SFWD SUNOL YARD HEADQUARTERS, 505 PALOMA WAY, SUNOL, ALAMEDA COUNTY

Dear Mr. Wells:

This Department has completed review of the August 8, 1991 Harding Lawson Associates (HLA) addendum to the initial November 5, 1990 HLA preliminary site assessment (PSA) proposal, which describes the tasks associated with a subsurface investigation of the referenced SFWD property in Sunol. This proposal, as amended, has been accepted.

A report must be submitted within 45 days of the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly for the duration of the investigation until eligible for final "sign-off" by the RWQCB.

Such quarterly reports are due the first day of the second month of each subsequent quarter (i.e., August 1, November 1, February 1, and May 1). Hence, a report documenting work occurring during the fourth quarter 1991 is due for submittal on or before February 1, 1992; a report documenting work occurring during the first quarter 1992 is due May 1, etc.

Please adhere to the following minimum monitoring schedule for the initial year of the investigation at this site, unless otherwise notified:

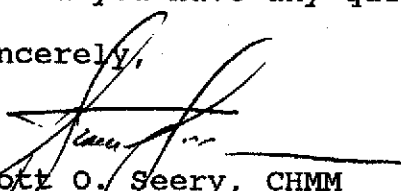
- 1) Water levels in each well are to be measured and recorded monthly for the next year, and then quarterly thereafter;
- 2) All (new) monitoring wells are to be sampled monthly for the first quarter. Such monthly sampling may be reduced to quarterly after the first three months if concentrations of target compounds remain stable, or diminish;
- 3) As indicated previously, summary reports are to be submitted to this Department and the RWQCB quarterly for the life of this project.

Mr. David Wells
RE: SFWD Sunol Headquarters, 505 Paloma Way
August 16, 1991
Page 2 of 2

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Failure to respond or a late response may result in the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day. Any extensions of stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

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

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Howard Hatayama, TSCD
Lester Feldman, ACWD
Ed Stewart, SFWD
Dave Dingman, SFWD
John Rapp, SFDPH
Suresh Patel, SF Utilities Engineering Bureau
Jeff Ludlow, Harding Lawson Assoc.
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0340

Certified Mailer # P 367 604 441

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

July 26, 1991

Mr. David Wells
City and County of San Francisco
Department of Public Health
101 Grove Street
San Francisco, CA 94102

RE: SFWD SUNOL YARD HEADQUARTERS, 505 PALOMA WAY, SUNOL, ALAMEDA COUNTY

Dear Mr. Wells:

On March 1, 1991, a notice, addressed to Harding Lawson Associates (HLA), was issued from this Department describing several issues which required resolution before HLA's preliminary site assessment proposal (PSA) would be approved and the environmental investigation initiated. A March 31, 1991 deadline was given for submittal of this information.

During the weeks following issuance of the March 1 notice, I had the opportunity to speak with Mr. Jeff Ludlow of HLA on two occasions, the most recent being May 16, 1991. During the May 16 conversation we discussed several issues raised in the March 1 letter, and reached some reasonable compromises. However, Mr. Ludlow informed me that SFPUC had essentially "pulled the plug" on completing the project at that time, but felt that the project would eventually proceed.

I then spoke that same day with Mr. Larry James of SFPUC regarding the status of the project. He indicated that there had been some difficulty encumbering funds, but that the funding issue had just been resolved. He indicated that this Department should anticipate a response to the March 1 notice within a couple of weeks. To date, no such response has been received.

Please be reminded that it was on July 9 and 13, 1990 that notice was first given to the San Francisco Health Department and Utilities Engineering Bureau regarding the City and County of San Francisco's legal responsibility to conduct a site investigation pursuant to the California Water Code. Field work was to have originally begun no later than September 9, 1991.

At this time, you are hereby directed to submit a response to the March 1, 1991 departmental notice within 15 days, or by the close of business, August 9, 1991. This response shall be in the form of an addendum to the original November 5, 1990 HLA proposal, and shall completely and accurately address the issues presented in the March 1, 1991 notice.

Mr. Dave Wells
RE: SFWD Sunol Yard, 505 Paloma Way
July 26, 1991
Page 2 of 2

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Failure to respond or a late response will result in the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day per violation. Any extensions to the stated deadlines, or modifications to the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Should you have any questions about the content of this letter, please call me at 415/271-4320.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Howard Hatayama, DHS
Jill Duerig, ACWD
Ed Stewart, SFWD
Dave Dingman, SFWD
John Rapp, SFDPH
Jeff Ludlow, Harding Lawson Assoc.
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0340

Certified Mailer # P 062 128 118

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

October 3, 1990

Mr. David Wells
City and County of San Francisco
Department of Public Health
101 Grove Street
San Francisco, CA 94102

RE: SFWD SUNOL YARD HEADQUARTERS, 505 PALOMA WAY, SUNOL, ALAMEDA COUNTY

Dear Mr. Wells:

This letter shall serve to summarize the outcome of the October 2, 1990 meeting between: yourself, and Messrs. John Rapp and Bruce Tsubui, representing the S.F. Department of Public Health (DPH); Messrs. Ed Stewart and Dave Dingman, SFWD; Mr. Steve Luquire, San Francisco Bay RWQCB; and, this author, Alameda County Environmental Health Department, Hazardous Materials Division.

As you will recall, the focus of this meeting was to discuss the requirements of the RWQCB and Alameda County for the preliminary assessment of subsurface conditions underlying the referenced SFWD site, and to determine to what degree the current scope of work proposed by the DPH has satisfied these requirements. It was determined that the current DPH plan does not meet the minimum requirements of an acceptable preliminary site assessment (PSA) proposal, as outlined in the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks.

As a result of the determinations outlined above, it was agreed upon by those parties present at the meeting to allow DPH an additional period of 30 days from the date of the meeting to compose and submit a PSA proposal which satisfies the RWQCB minimum requirements. This proposal will discuss, among others, such elements as:

- o The initial installation of a minimum of three (3) ground water monitoring wells; and/or,
- o The advancement of a suitable number of borings adequately located as to provide accurate and useful data to aid in locating an initial three (3) ground water monitoring wells and characterize soil conditions underlying this site.

Please reference the noted RWQCB Staff Recommendations, and its Appendix A (which augments the Staff Recommendations), to aid in composing the PSA proposal. Please bear in mind this PSA proposal and all subsequent reports, as well as project direction, must be under the seal of California-registered geologist, engineering geologist, or civil engineer with the appropriate project and professional background.

Mr. David Wells
RE: SFWD Sunol Yard Headquarters, 505 Paloma Way
October 3, 1990
Page 2 of 2

As was previously indicated, the PSA proposal is due within 30 days, or by **November 1, 1990**. Please remit a check totalling \$1,244 to offset expenses incurred by this Department in oversight of this Project. (Note: The noted \$1,244 deposit is the sum of \$744 and \$500 previously requested in correspondence from this office dated July 9 and 13, 1990, respectively, and reflects the initial discrete managerial control of the two subsites which are the focus of our present investigation.)

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

Sincerely,



Scott O. Seery
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Steve Luquire, RWQCB
Howard Hatayama, DHS
Jill Duerig, ACWD
Ed Stewart, SFWD
Dave Dingman, SFWD
John Rapp, SFDPH
Bruce Tsubui, SFDPH
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0340

Certified Mailer # P 062 127 866

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

July 13, 1990

Mr. David Wells
City and County of San Francisco
Department of Public Health
Toxics and Safety Services
101 Grove Street
San Francisco, CA 94102

RE: SOIL CONTAMINATION CLEAN-UP PROJECT; SFWD SUNOL YARD
HEADQUARTERS, 505 PALOMA WAY, SUNOL, ALAMEDA COUNTY

Dear Mr. Wells:

This letter confirms our telephone conversation July 11 and this Department's review of the January 4, 1990 American Environmental Management Corporation (AEMC) report, submitted under San Francisco Department of Public Health (SFDPH) cover dated March 28, 1990. The referenced AEMC report documents work performed by AEMC and SFDPH personnel November 15 and 30, 1990 during the investigation of soil contamination in proximity to a storage shed at the referenced site. Soil in this area exhibited some evidence of contamination with volatile organic compounds and metals during a preliminary investigation conducted during September 1989, documented in a SFDPH letter report dated November 9, 1989.

Among the contaminants identified in the sample collected during the September 1989 field activities, as documented in the November 9 report, several chlorinated and nonchlorinated compounds were present, as follows:

<u>COMPOUND</u>	<u>CONCENTRATION</u>
1,1-dichloroethane	400 ppb
1,1,1-trichloroethane	570
tetrachloroethylene	2,300
benzene	37
toluene	690
ethyl benzene	320
total xylenes	3,200
4-methyl-2-pentanone	690

Mr. Dave Wells
RE: SFWD, 505 Paloma Way, Sunol
July 13, 1990
Page 2 of 4

Lead was also present in this sample at a concentration of 200 ppm, more than 10 times the STLC value for this compound. According to the referenced November 9 report, the sampling depth was approximately 12 to 18 inches below grade.

Initial samples collected during the November 15 field activities identified the presence of total oil and grease (TOG) as high as 31,000 ppm in a sample identified as Sunol No. 1, collected from the sidewall of the excavation just under the foundation of the storage shed. A sample collected several feet laterally beneath this foundation (Sunol No. 3), representative of that soil still undisturbed and left in place below the shed, showed TOG concentrations of 12,000 ppm.

Final samples collected at the bottom of the excavation identify the presence of TOG as high as 150 ppm (Sunol No. 8) and total recoverable hydrocarbons (TRH), 290 ppm (Sunol No. 4). The final depth of the excavation is approximately 7 1/2 feet below grade at the south end, sloping to a shallower depth towards the north. The SFDPH cover to the January 4 AEMC report indicates that the soil becomes very sandy. The AEMC report identifies this soil as a very fine to fine grained silty sand (SW-ML). The excavation has since been backfilled and capped with asphalt.

As you are likely aware, this site is located at the head of Niles Canyon within a portion of the Sunol ground water subbasin, near the confluence of Arroyo de la Laguna and Alameda Creek. This alluvial basin is an area where the percolation and infiltration of irrigation water, precipitation, and stream flow provides significant recharge to the ground water aquifer. Water destined for domestic use is extracted at the Sunol filter gallery within a quarter mile of the site. Effluent flow into Alameda Creek helps to recharge ground water reservoirs underlying the Niles Cone at its apex in the vicinity of the Niles district of Fremont.

In light of this site's sensitive location and the potential impact upon drinking water resources a release of hazardous materials could produce, the presence of TOG, TRH, metals, and volatile compounds, particularly the chlorinated species, provides an element of concern regarding the future integrity of the resources which underlie this site. Therefore, you are requested to perform additional tasks to ensure that the integrity of these water resources has not been impacted by the historical releases identified by the aforementioned reports, and to remediate the soils impacted by waste oil and other contaminants.

Mr. Dave Wells
RE: SFWD, 505 Paloma Way, Sunol
July 13, 1990
Page 3 of 4

Your attention is directed to the July 9, 1990 correspondence from this Department which was addressed to Mr. Suresh Patel of the San Francisco Utilities and Engineering Bureau (SFUEB), and copied to you. The noted letter directs the SFUEB to conduct a ground water investigation following the closure of three underground storage tanks (UST) at this site during May of this year.

This preliminary site assessment (PSA) entails, among others, the installation of a suitable number of monitoring wells. Generally three (3) wells are initially installed. Water level measurements are surveyed in each well and, through the solution of a three-point problem to define the plane assumed to constitute the surface of the water table, the ground water gradient and flow direction are determined.

An additional well must be installed in the confirmed down gradient position from the contaminated area in proximity to the storage shed. The exact location of this well must be based upon the results of the ground water gradient determination associated with the UST investigation. This well should be within 10 feet of the contaminated area once this contaminated area's full extent is known.

The full extent of the contamination, both laterally and vertically, will not be known until such time as the soil investigation continues in the area beneath the storage shed where sample Sunol No. 3 identified the presence of TOG at concentrations of 12,000 ppm. Therefore, you must pursue the soil investigation to the fullest extent possible. Contaminated soils must be excavated from the site and either treated on-site or disposed of at a facility licensed to accept wastes of this type. This activity will likely involve the demolition of the storage shed. We understand that the shed is already slated for demolition in the near future; however, the date for this demolition will need to be moved up to meet the requirements of this Department.

Please submit for review a proposal which outlines your planned activities pertinent to meeting the requirements outlined this letter. However, the installation and monitoring of the ground water well may be best left to those California-certified professionals engaged in the ground water investigation associated with the former UST subsite. Hence, this (well installation) aspect should be incorporated as an element of the proposal addressing the UST investigation. The SFUEB is being notified of this fact by way of copy of this letter.

Mr. Dave Wells
RE: SFWD, 505 Paloma Way, Sunol
July 13, 1990
Page 4 of 4

This Department will oversee all work at this site. This oversight will include the review and comment on work proposals and technical guidance during the investigation and remediation. Your proposal must be submitted within 30 days of the date of this letter, or by September 13, 1990. Accompanying this proposal must be a check payable to Alameda County totalling \$500 to offset expenses incurred by this Department during oversight of this project.

A report must be submitted within 30 days of the soil excavation/remediation phase of this project. This report must document all work performed at the site, plans for the treatment or disposal of the affected soils, the results of laboratory analyses, and recommendations for future work, among other elements.

Any work requiring professional geologic or hydrologic interpretations or recommendations must be submitted under seal of a California-certified engineering geologist, -registered geologist or civil engineer. A statement of qualifications must be included with your report for each lead professional.

This project will require that you coordinate your scope of work and schedule of site activities with those individuals and city departments engaged in the UST investigation. Our contact for the UST investigation is Mr. Suresh Patel of the SFPEUB.

Should you have any questions regarding the content of this letter, please contact me at 415/271-4320.

Sincerely,



Scott O. Seery
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Department
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Steve Luquire, RWQCB
Howard Hatayama, DHS
Jill Duerig, ACWD
Suresh Patel, SFEUB
Bob Vasconcellos, SFWD

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0340

Certified Mailer # P 062 127 859

July 9, 1990

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

Mr. Suresh Patel
City and County of San Francisco
Utilities Engineering Bureau
1155 Market Street, 5th Floor
San Francisco, CA 94103

RE: UNDERGROUND STORAGE TANK CLOSURE REPORT; SFWD SUNOL YARD
HEADQUARTERS, 505 PALOMA WAY, SUNOL: REQUEST FOR PRELIMINARY
SITE ASSESSMENT (PSA) PROPOSAL

Dear Mr. Patel:

Our office has completed review of the underground storage tank (UST) closure report submitted by Stacey & Witbeck - Rogers / Genner a JV. This report documents the removal May 15 and 16, 1990 of three (3) USTs, and provides the results of analyses performed upon soil samples collected May 16, 1990.

The results of the laboratory analyses indicate that motor fuel constituents were present in the sample collected below the 550 gallon diesel tank (Sample WD 2022-1), including 40 ppm total petroleum hydrocarbons as diesel (TPH-D), 7.6 ppm TPH as gasoline (TPH-G), as well as concentrations of benzene, toluene, ethylbenzene, and xylene isomers (BTEX) well above their respective detection limits. Samples collected from below the 550 and 1000 gallon gasoline tanks also showed minor concentrations of certain of the volatile BTEX compounds.

This facility is located at the head of Niles Canyon along a portion of the Alameda Creek watershed. The site is within one of three subbasins of the Sunol Valley Ground Water Basin, the Sunol subbasin. The Quaternary alluvium which underlies this site consists primarily of highly permeable, unconsolidated beds of sand, gravel and boulders with discontinuous layers of clay, typical of streambed deposits. According to the State of California Department of Water Resources Bulletin No. 118-2, June 1974, these deposits have a permeability of up to 10 ft/day (75 gal/day).

Significant recharge of ground water in the Sunol subbasin is through infiltration and percolation of precipitation, stream flow along Alameda Creek, and water applied for irrigation and other uses on the Quaternary alluvium of the valley. The largest extractions of ground water in the Sunol subbasin have occurred at the Sunol filter galleries located at depths of about 15 feet. Other significant discharge is by effluent flow into Alameda Creek. Infiltration and percolation of this effluent flow helps to recharge the ground water reservoirs underlying the Niles Cone at its apex in the vicinity of the Niles district of Fremont.

Mr. Suresh Patel
RE: 505 Paloma Way, Sunol
July 9, 1990
Page 2 of 4

As a result of this site's sensitive location and the potential impact a release of hazardous materials could have upon domestic drinking water supplies, you are requested to perform additional investigative work to ensure that the integrity of these water supplies has not been compromised. This preliminary site assessment (PSA) will help to define the vertical and lateral impact upon ground water and soils resulting from any releases from the tanks prior to their removal. The information gathered by this investigation will be used to determine an appropriate course of action to remediate the site, if necessary. The PSA must be conducted in accordance with the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks. The major elements of such an investigation are summarized in the attached Appendix A.

In order to proceed with a site investigation, you should obtain professional services of a reputable environmental/geotechnical firm. Your responsibility is to have the consultant submit for review a proposal outlining planned activities pertinent to meeting the criteria broadly outlined in this letter and the attached Appendix A.

This Department will oversee the site assessment for the referenced facility. This oversight will include our review and comment on work proposals and technical guidance on appropriate investigative approaches. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7. The RWQCB may choose to take over as lead agency if it is determined following the completion of the initial assessment that there has been a substantial impact upon ground water.

This PSA proposal is due within 30 days of the date of this letter, or by August 9, 1990. Once this proposal has been reviewed and approved, work should commence no later than September 9, 1990. Accompanying this proposal must be a check payable to Alameda County totalling \$744 to offset expenses incurred by this Department in oversight of this project.

A report must be submitted within 30 days after the completion of this phase of work at the site. Subsequent reports must be submitted quarterly until this site qualifies for final RWQCB "sign off". Such quarterly reports are due the first day of the second month of each subsequent quarter (i.e., November 1, February 1, May 1, and August 1). These reports should describe the status of the remediation/investigation and must include, among others, the following elements:

Mr. Suresh Patel
RE: 505 Paloma Way, Sunol
July 9, 1990
Page 3 of 4

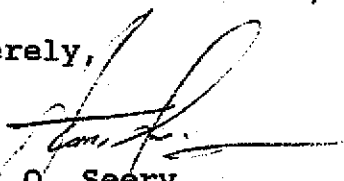
- 0 Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- 0 Status of ground water contamination characterization
- 0 Interpretation of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.
- 0 Recommendations or plans for additional investigative work or remediation

All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. Please include a statement of qualifications for each lead professional involved with this project.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a late response could result in the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Should you have any questions about the content of this letter, please call me at 415/271-4320.

Sincerely,


Scott O. Seery
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Alameda County
Department of Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Steve Luquire, RWQCB
Howard Hatayama, DHS

Mr. Suresh Patel
RE: 505 Paloma Way, Sunol
July 9, 1990
Page 4 of 4

cc: (con.'t)

Jill Duerig, ACWD
David Wells, San Francisco Health Department

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0340

April 17, 1990

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

Mr. Suresh Patel
City and County of San Francisco
Utilities Engineering Bureau
1155 Market Street., 5th Floor
San Francisco, CA 94103

RE: UNDERGROUND STORAGE TANK REPLACEMENT; SFWD SUNOL YARD
HEADQUARTERS, 505 PALOMA WAY, SUNOL, ALAMEDA COUNTY

Dear Mr. Patel:

This letter follows our telephone conversation today and shall serve as this Division's acceptance of the underground fuel storage tank (UST) replacement plans for the referenced facility as amended March 21 and April 16, 1990.

Please notify this office a minimum of 48-hours in advance of the day you have scheduled to test the Ronan leak detector system. An inspector from this office must witness this "final test" to satisfy one element of the UST installation requirements imposed by Alameda County. Further, before placing the new tanks into actual service, they must pass a tank integrity (precision) test. The results of this test must be submitted to this Division within 2-weeks of your receipt of the test data. Following satisfactory review of this data, a 5-year UST operating permit will be issued.

Please also notify this office a minimum of 48-hours in advance of the scheduled closure of the existing tanks at this site. An inspector from this office, as well as that of the local fire department sharing jurisdiction, must witness closure and sampling activities.

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

Sincerely,



Scott D. Seery
Hazardous Materials Specialist

SOS:sos

cc: Rafat A. Shahid, Assistant Agency Director
Edgar Howell, Chief, Department of Environmental Health
Gil Jenson, Alameda County District Attorney's Office
Ted Ferriera, Alameda County Fire Marshall
Mike Martin, California Division of Forestry
Lester Feldman, RWQCB
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



R0340

Telephone Number: (415)

March 15, 1990

Mr. Suresh Patel
City and County of San Francisco
Utilities Engineering Bureau
1155 Market Street, 5th Floor
San Francisco, CA 94103

RE: UNDERGROUND STORAGE TANK INSTALLATION PLANS; SFWD SUNOL YARD
HEADQUARTERS, 505 PALOMA WAY, SUNOL, ALAMEDA COUNTY

Dear Mr. Patel:

Our office has completed a review of the tank replacement plans for the referenced site as submitted February 23, 1990. The following list of items must be addressed through the submittal of an addendum to the original set of plans which provides the requested additional information or clarifications. Upon receipt and satisfactory review of the noted addendum, this Division will issue its acceptance of the plans and will allow the continuation of work at this site.

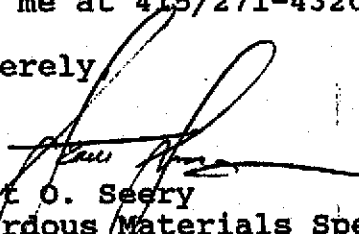
- 1) Provide manufacturer's specifications for tanks, all piping, overflow containment manholes, and other miscellaneous appurtenances associated with the tank systems proper;
- 2) Primary and secondary product piping must incorporate flex or swing joints where they attach to piping sumps atop both tanks. Current design drawings do not illustrate that such joints are used;
- 3) Subsections 2635 (b)(8) and (b)(9) of Title 23, California Code of Regulations (CCR), present general overflow containment and prevention design and management requirements for all new underground storage tanks (UST). These subsections, which supplement construction and design criteria discussed under Sections 2631 and 2633 23 CCR, describe available alternatives to meet the overflow protection requirements. Please describe, through the submittal of additional equipment specifications and/or management practices, how these requirements have been satisfied;

Mr. Suresh Patel
RE: SFWD, 505 Paloma Way, Sunol
March 15, 1990
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- 4) Subsections 2635 (b)(6) and (b)(7) 23 CCR describe the requirements for the testing of UST systems (tanks and piping) before being covered, enclosed, or put into service. Please submit a signed affidavit which documents the results of any and all tests performed on the tank systems to date, and provide copies of any field notes, photographs and other supporting information, including the names and titles of those individuals witnessing these tests.

Please respond to the above list of items through the submittal of the requested information. Should you have any questions, please call me at 415/271-4320.

Sincerely,



Scott O. Seery
Hazardous Materials Specialist

SOS:sos

cc: Rafat A. Shahid, Assistant Agency Director, Alameda County
Environmental Health Department
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Mike Hood, Alameda County Building Inspection Department
Ted Ferrera, Alameda County Fire Marshall
Mike Martin, California Division of Forestry
Lester Feldman, RWQCB
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0853 (5555 Calaveras)
✓R0340 (505 Paloma)

April 26, 1989

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

Mr. James Cooney
San Francisco Water Dept.
425 Mason Street
San Francisco, CA 94102

RE: QUARTERLY MONITORING REPORTS, TANK TESTING AND BUSINESS PLANS,
SAN FRANCISCO WATER DEPT. (SFWD) FACILITIES, SUNOL

Dear Mr. Cooney:

This letter is in response to a telephone conversation between Mr. James Chia of the Department of Public Works (DPW) and Mr. Scott Seery of this office. Mr. Seery was informed by Mr. Chia that two of the SFWD facilities in Sunol, 505 Paloma and 5555 Calaveras Roads, are now under the direction of the SFWD which, we understand, you head. The remaining Sunol facility, 8653 Calaveras Road, is currently still under the direction of the DPW.

As was explained to Mr. Chia, one condition of this office granting approval of the underground storage tank (UST) monitoring plans for the 505 Paloma and 5555 Calaveras Roads sites, as submitted by Clayton Environmental Consultants, Inc., was the submittal of quarterly monitoring reports to this office. Approval of the monitoring plans for the two referenced sites was granted in letters from this office dated September 2 and 16, 1988, respectively. To date, we are not in receipt of monitoring reports for the last quarter of 1988 (Oct. - Dec.) and the first quarter of 1989 (Jan. - Mar.). These reports are required to be submitted within 15 days from the end of each quarter.

Regarding the results of integrity tests conducted August 4, 1988 on two manifolded 10,000-gallon diesel USTs at the 5555 Calaveras Road site, the recorded leak rate of -0.067 gallons/hour may indicate a potential leak in one or both tanks, or piping systems. Because the degree of accuracy is limited when tests are performed on USTs connected in this way, you are requested to retest these tanks independently so that more conclusive results may be generated. This will involve breaking-up the manifold system in order to isolate the tanks, and will likely require partial excavation of the tank overburden and drive slabs.

Although presumably interpreted by the consultant as listing "acceptable" leak rates, NFPA Pamphlet 329, Table A-4-3.11, actually identifies accuracy criterion for integrity tests based upon tank size. Until the California Health and Safety Code was amended in

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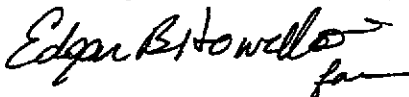
1987, NFPA 329 was cited under Section 25292(b)(1) only as a reference to what defined a "precision test." This reference was deleted in the 1987 amendments. In comparison, Section 2643(b) of Title 23, California Code of Regulations (CCR), in part requires such integrity, or precision tests to be capable of "... detecting a release of a hazardous substance at a rate of 0.05 gallons per hour." No adjustment to the required degree of accuracy is allowed based solely upon the size of the tank or tanks. Currently, however, AB 1030 proposes to amend sections of Title 23, including Section 2643, "Underground Storage Tank Testing." If passed into law as proposed, consideration for tank size will be provided only in terms of the potential for a given test method to detect a leak at or below a given threshold. Again, this does not identify "acceptable" leak rates, but rather provides acceptable working limitations to the accuracy of a given test method. This Bill will be presented before the Assembly in September of this year and, if passed without need of major revision, will be implemented some 6 months later.

Lastly, our records indicate that Hazardous Materials Business Plans have not been submitted for the 5555 Calaveras and 505 Paloma Roads sites as required under Chapter 6.95 of the California Health and Safety Code. Enclosed are three copies of the business plan form and instructions.

Please submit quarterly monitoring reports and completed business plans for the above referenced sites within 30 days of the receipt of this letter. Further, we request that isolated integrity tests be conducted on the two 10,000 gallon diesel tanks at the 5555 Calaveras Road site also within 30 days of the receipt of this letter. Results of these tests must be submitted to this office within 15 days of the completion of said tests.

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

Sincerely,



Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:SOS:mam

cc: James Chia, SFDPW
Rich Hartman, SFWD
Robert Loeloff, SFWD
Paul Demeduk, SFWD
Sami Malaeb, Clayton Environmental Consultants, Inc.
Scott Seery, Alameda County Hazardous Materials Division
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



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

R0340

Telephone Number: (415) 271-4320

September 2, 1988

City and County of San Francisco
Department of Public Works
Bureau of Engineering
Room 359, City Hall
San Francisco, CA 94102
Attn: Willy Tsai

SUBJECT: UNDERGROUND STORAGE TANK MONITORING PROPOSALS

Dear Mr. Tsai:

The Alameda County Division of Hazardous Materials has reviewed and approved the proposed monitoring plans as submitted by your consultant Clayton Environmental Consultants, Inc. for the following sites and tanks as described below:

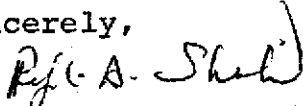
<u>SITE</u>	<u>SF ID</u>	<u>SIZE</u>	<u>PRODUCT</u>	<u>PROPOSED STATE MONITORING ALTERNATIVE</u>
SF Water Department	177	550	U. Gas	Alt. No. 5
505 Paloma Way	178	1000	R. Gas	Alt. No. 5
Sunol, CA 94586	179	550	Diesel	Alt. No. 5
Sunol Pumping Station	17E	10000	Diesel Oil	Alt. No. 7 with
505 Paloma Way	17F	500	Lube Oil	in tank level
Sunol, CA 94586	17G	500	Waste Oil	monitor

The proposed plans for the site at 8653 Calaveras Road, Sunol, utilizing State Monitoring Alternative No. 2 will be considered provided you submit the following:

- 1) Documentation on the depth to groundwater (seasonal high) and;
- 2) Documentation that the proposed vadose zone monitor will detect diesel vapors within the backfill material located at this site.

Should you have any questions, please contact Lizabeth Rose, Hazardous Materials Specialist at 415/271-4320.

Sincerely,


Rafat A. Shahid, Chief
Hazardous Materials Division

cc: Richard Fehler, Clayton Environmental
Sami Malaeb, Clayton Environmental