Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Wednesday, July 30, 2014 3:54 PM
To: 'Karl Kerner'
Cc: Frank Lopez; Chris Martin; Jasmine Senn (jasmine@aeei.com); 'jpaul@skbcos.com'; Shane Nolan; 'ryost@platinum-energy.net'; Ed.C.Ralston@p66.com; Dennis Dettloff; Roe, Dilan, Env. Health
Subject: RE: Soil Reuse and Backfill, 7210 Bancroft Avenue, Oakland, ACEH fuel leak case RO356

Dear Mr. Kerner,

Alameda County Environmental Health (ACEH) has reviewed the email entitled *Soil Reuse and Backfill, 7210 Bancroft Avenue, Oakland* (Backfill email), dated July 30, 2014 and prepared by Atlas Environmental Engineering, Inc. (Atlas) regarding the condition of the underground storage tanks (UST) excavation and the proposed backfill of the excavation at the subject site. As stated in the Backfill email, approximately 16- to 18 feet of the upper portion of the UST excavation will be backfilled with import material having similar hydrogeologic properties as the native sands silts and clays. The import fill will be underlain by the remaining excavation pit pea gravel, which will be covered with a geotextile filter fabric. ACEH understands that upon completion of the station demolition and UST pit backfill activities, the site will be covered with an impermeable asphalt concrete pavement.

The backfill recommendations as described in the Backfill email is acceptable to ACEH. As noted in ACEHs Directive dated July 14, 2014, the import material used as backfill should have documentation demonstrating the material is in compliance with Department of Toxic Substances Control (DTSC) clean fill import guidelines.

Please provide sufficient compactive effort of the import backfill in order to minimize future subsidence at the tank pit location.

The station demolition report documenting fuel system removal and disposal should include sampling and analysis of excavation, piping, and dispenser samples, stockpile soil profiling and disposal/re-use, import fill documentation, documentation of the compactive effort applied to the import fill, and manifests/disposal tickets documenting the quantity and destination of material removed from the site.

As discussed in a phone conversation from earlier today, profile sampling of the pea gravel stockpile should be consistent with the destination disposal facility and that the receiving facility should be made aware that the material is from an active fuel leak site.

Thank you for your cooperation. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Sincerely,

Keith Nowell

Keith Nowell PG, CHG
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PDF copies of case files can be reviewed/downloaded at:

http://www.acgov.org/aceh/lop/ust.htm

From: Karl Kerner [mailto:karl@aeei.com]
Sent: Wednesday, July 30, 2014 2:18 PM
To: Nowell, Keith, Env. Health
Cc: Frank Lopez; Chris Martin
Subject: Soil Reuse and Backfill, 7210 Bancroft Avenue, Oakland

Keith,

Based on our recent phone conversation regarding the stockpile material sampling at the subject site, ATLAS understands the following:

Since the material is pea gravel, its reuse will not be consistent with the Alameda County Environmental Health (ACEH) oversight of the current site remedial efforts as this material is not similar to the onsite soils and may impact the site hydrology if reused as backfill in the tank pit.

With this understanding, ATLAS would suggest the following course of action in order to complete the tank removal and site demolition operations:

Properly dispose of the existing onsite stockpiled material (350 - 375 cubic yards) and import fill material consistent with onsite soils. It is noted that groundwater is present beneath the site at approximately 21 - 23 feet below grade and the current tank pit excavation is within 2 feet of the groundwater level excluding the pea gravel remaining in the tank pit. Therefore, it is suggested to level out the any of the remaining pea gravel in the tank pit to act as a bridge to accept the import material. This will limit any potential pumping of the import material during placement. With the leveling off of the pea gravel in the tank pit, the import placement is anticipated to begin at approximately 16-18 feet below grade and continue to the surface. As an added safeguard, a filter fabric can be placed between the pea gravel base and import fill sections.

With the backfill of import material similar to the site soils from the surface to at least 16 feet below grade, a safeguard against significant infiltration should be realized. In addition, the limited use of pea gravel for the bridge should not affect the current site hydrology adversely as Gravels have been observed beneath site in the area of the tank from approximately 10 - 30 feet below grade. A cross-section is attached for reference.

We would appreciate your comments regarding the suggested actions. Thanks so much.