



State Water Resources Control Board



Alan C. Lloyd, Ph.D.
Agency Secretary

Division of Financial Assistance

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Arnold Schwarzenegger
Governor

APR 05 2006

Mr. Patrick Van Ness
Signature at the Estuary, LLC
4670 Willow Road, #200
Pleasanton, CA 94588

Alameda County
APR 11 2006
Environmental Health

Dear Mr. Van Ness:

UNDERGROUND STORAGE TANK CLEANUP FUND (FUND), FUND MANAGER
DECISION (FMD) FOR ELIGIBILITY DETERMINATION: CLAIM NO. 017971; FOR SITE
ADDRESS: 303 & 315 DERBY AVE, OAKLAND, CA

This is in response to your request for an FMD dated May 19, 2004. Your letter requests that I reconsider the Fund's Staff Decision dated March 22, 2004. I have reviewed the request and supporting documents. The basis for my decision is discussed below.

Decision

Signature at the Estuary, LLC (Signature) is eligible for participation in the Fund for corrective action costs incurred for the two USTs discovered during site remediation activities, and removed on November 17, 2003. The approximate capacity of these USTs is listed as 500 gallons. Free product was noted in the soil surrounding these USTs. Since these USTs were removed during Signature's ownership of the property, and obvious petroleum contamination was found adjacent to the USTs, corrective action costs related to these USTs is eligible for reimbursement from the Fund. These USTs are designated as UST 4 and UST 5 in the Fund application and in the Lowney figures. Signature, under their own claim, is eligible for participation in the Fund for UST 4 and UST 5. Therefore, the claim is being placed on the Priority List in Priority Class C with a deductible of \$5,000.

However, corrective action costs associated with USTs 1, 2, and 3 are not eligible for participation in the Fund. In order for a claimant to be eligible for the Fund, the claimant must have been the owner or operator of the USTs responsible for the petroleum release, or receive an assignment of rights to a Fund claim where the owner or operator is eligible to participate in the Fund. Based on the limited information available to the Fund, it appears that one or more USTs were removed prior to John and Charlene Weber's (Weber) acquisition of the property. Until it can be proven to the Fund's satisfaction that Weber actually owned the property while USTs 1, 2 or 3 were still in-place, any costs associated with releases from these three USTs remains ineligible. Since there is not enough evidence to support that the Weber's owned USTs 1, 2, and 3, your request for an assignment will not be considered because the Weber's have not met the eligibility criteria for participation in the Fund. The assignment of the claim hinged on Weber's ownership of USTs 1, 2 and 3.

California Environmental Protection Agency



Therefore, based on the ineligibility of USTs 1, 2 and 3 and the piping associated with the groundwater extraction trench, I have determined that only corrective action costs associated with USTs 4 and 5 are eligible for reimbursement.

Authority

The following sections cited are excerpted from the Petroleum Underground Storage Tank Cleanup Fund Regulations, Title 23, Division 3, Chapter 18 of the California Code of Regulations (Fund Regulations). Section 2810.1(a) states, in part:

“Only a current or former owner or operator of an underground storage tank...may file a claim against the Fund.”

Further, section 2811(a)(1) states, in part:

“There was an unauthorized release of petroleum from the underground storage tank....”

Background

Shell Oil Company constructed a bulk fuel distribution terminal on the site in 1925. Petroleum products were delivered to the site by underground pipeline and railcar and were stored in a number of aboveground storage tanks (ASTs). As many as five, smaller capacity USTs were also present on the property. The reported total petroleum storage capacity of the facility was over 2,000,000 gallons, of which approximately one percent or less was in USTs. Simmons Terminal Corporation (Simmons) purchased the facility from Shell in 1980 and continued to operate the bulk terminal until 1985. In 1985, the facility was sold to John and Charlene Weber (Weber) for use by ICONCO, Inc., a demolition company owned by Weber. Weber continued to use two ASTs while demolishing the remaining storage tanks. In June 2003, the property was sold to Signature at the Estuary LLC (Signature), a developer. Signature is currently clearing the site for construction of a 100-unit residential condominium unit.

Petroleum releases from the bulk terminal were first reported in 1942. During the 1970s and 1980s, an oil recovery system was operated that consisted of extraction wells, storm water drainage controls, an oil-water separator and oil absorbent booms. Investigations conducted in 1982, 1985, and 2001, identified widespread petroleum contamination across the site. Two underground pipelines underlying Glascock St. (northern site boundary), are reportedly still in-place. These pipelines were formerly used to deliver petroleum to the bulk plant. Two pipelines were also formerly located adjacent to the estuary on the south side of the property.

According to a June 1982, Woodward-Clyde Consultants (WCC) investigation report, a pipeline rupture at the site coincided with the observation of an oil sheen coming from a storm drain outlet. At the time of the WCC investigation, a total of 27 “observation wells” were located on the site. According to the report, measurable floating product or sheen was observed in 19 of

the 27 wells. It is notable that 18 of the observation wells were located along Glascock St., the northern site boundary, which is on the up-gradient side of the site. Measurable free-floating product or sheen was observed in 14 of the 18 Glascock St. wells. Based on Figures 3 and 4 in the WCC report, it appears the pipeline rupture occurred approximately 20 feet north of a 1,000,000-gallon AST located near the northwest property corner.

According to a Lowney Associates (Lowney) Corrective Action Plan dated October 31, 2002, a groundwater extraction and treatment system had been operational for at least 40 years and was operated by Weber until approximately 1988. At the time of the first Lowney site visit, Weber was using two operational ASTs, which were connected by underground piping to a diesel and an unleaded gasoline dispenser. Lowney also noted two steel pipes extending out from the concrete wharf over the estuary. Reportedly these pipes were used to load fuel from barges to the former bulk plant. Lowney concluded that pipeline trenches might have acted as migration pathways for petroleum to reach the estuary.

In a May 17, 2004, report, Lowney summarized the site conditions and corrective action that had taken place under their oversight. The primary purpose of this report was to estimate the quantity of soil and groundwater contamination that was associated with former USTs on the site. Their conclusion was that 32 percent of the soil contamination and 50 percent of the groundwater contamination was related to USTs. Figure 2 to the Lowney report indicated the areas of gross contamination encountered during excavation, and also notes the former locations of five USTs.

One of the largest areas of gross contamination noted in Figure 2 is the area around the former groundwater extraction trench and two pipelines just north of this trench. The figure implies that the two pipelines are somehow related to UST operations, however the figure clearly indicates that the pipelines terminate at an oil/water separator, adjacent to two USTs (UST 1 and UST 2, removed in 1985). Soil and groundwater contamination in this area is not eligible for Fund reimbursement, since it is directly south (down gradient) from the AST complex and is not related to any eligible USTs.

The Lowney report estimates that approximately 7,741 tons of petroleum-impacted soil was associated with UST systems at the site. Reportedly, a total of 32,000 tons of petroleum-impacted soil was removed from the site.

UST Ownership Issues

The application submitted to the Fund indicates Weber purchased the property from Simmons Terminal Corp. in August 1985. The application further states that Weber removed three USTs during August 1985, and that an additional two USTs were removed in November 2003, after Signature acquired the property.

According to an August 16, 1985, letter from Weber to the Regional Water Quality Control Board, Weber intended to remove the "storage tanks" if they acquire the property. The letter

then states that Weber would "... remove and legally dispose of the oily absorbent pads that are in the bottom of the underground tank excavation and to over excavate the bottom of the underground tank hole to remove any product which may have leaked from the removed tank."

The August 26, 1985, letter from the Regional Board to Weber acknowledges the information provided in the August 16, 1985, letter and refers to Weber as "the prospective purchaser".

A Corporation Grant Deed records the transfer of the property from Simmons to Weber. This Deed was signed by Simmons on August 7, 1985, and was recorded by Alameda County on August 27, 1985.

On December 6, 1985, a permit application to remove tanks was filed at the City of Oakland Fire Marshal's office. The application lists six tanks with a capacity of 24,400 barrels each. Based on the stated tank capacity, it appears that the purpose of this permit was to remove the ASTs, rather than the USTs.

W. A. Craig, Inc. completed a July 23, 2001, investigation report for Weber. The background section of this report states: "All of the USTs were removed prior to ICONCO purchasing the property in August of 1985." Table 1 to this report lists the fuel storage tanks in-use or previously removed at the time of the report. The total petroleum capacity is listed as 2,928,800-gallons, of which less than 1 percent was in USTs.

Mr. John E. Weber provided a signed declaration, dated February 17, 2005. In his declaration, Mr. Weber stated that he and his wife acquired the property during August 1985; procured tank removal permits in December 1985, and that he believed the removals were completed within three months. Mr. Weber's declaration does not state how many USTs were removed during his ownership or the removal dates of the USTs.

Appeal Process

This represents an FMD. If you are not in agreement with the above decision, you may request a Final Division Decision by the Chief of the Division within 60 days of the date of this letter. If you do not request a Final Division Decision within those 60 days, this decision will become final and conclusive. The request should be sent to:

Barbara L. Evoy, Chief
Division of Financial Assistance
State Water Resources Control Board
P.O. Box 944212
Sacramento, CA 94344-2120

USTCF Claim No. 17971

The request to the Chief of the Division must include, at a minimum: (1) a statement describing how the claimant is damaged by the prior staff decision; (2) a description of the remedy or

outcome desired; and (3) an explanation and supporting documentation of why the claimant believes the action or the decision is erroneous, inappropriate or improper.

This completes the initial review. The next step in the claim review process is to conduct a compliance review.

Compliance Review: Staff reviews, verifies, and processes claims based on the priority and rank within a priority class. After the Board adopts the Priority List, your claim will remain on the Priority List until your Priority Class and rank are reached. At that time, staff will conduct an extensive Compliance Review at the local regulatory agency or Regional Water Quality Control Board. During this Compliance Review, staff may request additional information needed to verify eligibility. Once the Compliance Review is completed, staff will determine if the claim is valid or must be rejected. If the claim is valid, a Letter of Commitment will be issued obligating funds toward the cleanup. If staff determines that you have not complied with regulations governing site cleanup, you have not supplied necessary information or documentation, or your claim application contains a material error, the claim will be rejected. In such event, you will be issued a Notice of Intended Removal from the Priority List, informed of the basis for the proposed removal of your claim, and provided an opportunity to correct the condition that is the basis for the proposed removal. Your claim will be barred from further participation in the Fund, if the claim application contains a material error resulting from fraud or misrepresentation.

Record keeping: During your cleanup project you should keep complete and well organized records of all corrective action activity and payment transactions. If you are eventually issued a Letter of Commitment, you will be required to submit: (1) copies of detailed invoices for all corrective action activity performed (including subcontractor invoices); (2) copies of canceled checks used to pay for work shown on the invoices; (3) copies of technical documents (bids, narrative work description, reports); and (4) evidence that the claimant paid for the work performed (not paid by another party). These documents are necessary for reimbursement and failure to submit them could impact the amount of reimbursement made by the Fund. ***It is not necessary to submit these documents at this time; however, they will definitely be required prior to reimbursement.***

Compliance with Corrective Action Requirements: In order to be reimbursed for your eligible costs of cleanup incurred after December 2, 1991, you must have complied with corrective action requirements of Article 11, Chapter 16, Division 3, Title 23, California Code of Regulations. Article 11 categorized the corrective action process into *phases*. In addition, Article 11 requires the responsible party to submit an *investigative workplan/Corrective Action Plan* (CAP) before performing any work. This phasing process and the workplan/CAP requirements were intended to:

1. help the responsible party undertake the necessary corrective action in a cost-effective, efficient and timely manner;

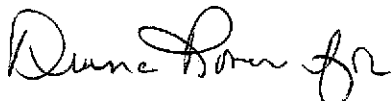
2. enable the regulatory agency to review and approve the proposed cost-effective corrective action alternative before any corrective action work was performed; and
3. ensure the Fund will only reimburse the most cost-effective corrective action alternative required by the regulatory agency to achieve the minimum cleanup necessary to protect human health, safety and the environment.

In some limited situations *interim cleanup* will be necessary to mitigate a demonstrated immediate hazard to public health, or the environment. Program regulations allow the responsible party to undertake interim remedial action after: (1) notifying the regulatory agency of the proposed action; and (2) complying with any requirements that the regulatory agency may set. Interim remedial action should only be proposed when necessary to mitigate an immediate demonstrated hazard. ***Implementing interim remedial action does not eliminate the requirement for a CAP and an evaluation of the most cost-effective corrective action alternative.***

Three bids: Only corrective action costs required by the regulatory agency to protect human health, safety, and the environment can be claimed for reimbursement. You must comply with all regulatory agency time schedules and requirements and you must obtain three bids for any required corrective action. ***If you do not obtain three bids or a waiver of the three-bid requirement, reimbursement is not assured and costs may be rejected as ineligible.***

If you have any questions regarding this letter, please telephone Mr. David F. Charter at (916) 341-5652.

Sincerely,



Ronald M. Duff, P.E., Fund Manager
Underground Storage Tank Cleanup Fund

cc: Mr. Stuart I. Block
Cox Castle Nicholson, LLP
555 Montgomery St., Suite 1500
San Francisco, CA 94111

Mr. Chuck Headlee
RWQCB, Region 2
1515 Clay Street, Ste. 1400
Oakland, CA 94612

Mr. Peter M. Langtry
Lowney Associates
167 Filbert St.
Oakland, CA 94607-2531

Ms. Donna Drogos
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577



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

RO0000437

April 14, 2004

Ms. Mary Grace Houlihan
Signature Properties
4670 Willow Road, Suite 200
Pleasanton, CA 94588

**Subject: Fuel Leak Case #RO0000437, Glascock Ave Warehouse, 2901 Glascock Ave,
Oakland, CA 94601**

Dear Ms. Houlihan:

Alameda County Environmental Health (ACEH) staff has received a copy of Letter by Mr. Bruce H. Wolfe, Executive Officer, Regional Water Quality Control Board (RWQCB) dated March 12th, 2004, titled "Conditional Acceptance of : Soil Removal Completion Report, Groundwater Quality Evaluation and Groundwater Quality Monitoring Workplan 303 and 315 Derby Avenue, 2909 Glascock Street, Oakland, Alameda County; and Corrective Action Completion Report and Groundwater Monitoring Work plan, 2901 Glascock Street, Oakland, Alameda County".

This office concurs with the above document regarding the above subject site. Furthermore, per our joint meeting with Ms. Betty Graham and Mr. Roger Brewer of Regional Water Quality Control Board (RWQCB) dated March 24th, 2004, Alameda County Environmental Health (ACEH) office is transferring the above subject case to RWQCB as of April 5th, 2004.

All further remedial activity oversight will be performed by RWQCB. Please ensure that RWQCB is aware of all activities regarding the above subject site.

If you have any questions please call Amir Gholami at 510-567-6876.

Sincerely,

Donna Drogos, Supervising Hazardous Materials Specialist

C: Peter Langtry, Lowney Associates, 167 Filbert Street, Oakland, CA 94607
Betty Graham, RWQCB, 1515 Clay St., Oakland, CA 94612
D. Drogos, A. Gholami

April 5, 2004
1731-2G

Ms. Betty Graham
**CALIFORNIA REGIONAL WATER QUALITY
CONTROL BOARD**
1515 Clay Street, Suite 1400
Oakland, California 94612

RE: **SOIL REMOVAL COMPLETION
REPORT, GROUND WATER QUALITY
EVALUATION, AND GROUND WATER
QUALITY MONITORING WORK PLAN
303 AND 315 DERBY AVENUE
2901 AND 2909 GLASCOCK STREET
OAKLAND, CALIFORNIA**

1 R0437

Dear Ms. Graham:

This reports summarizes the soil removal activities at 303 and 315 Derby Avenue and 2901 and 2909 Glascock Street in Oakland, California.

We refer you to the text of the report for details regarding this study. Thank you for choosing us to assist you. If you have any questions, please call and we will be glad to discuss them with you.

Very truly yours,

LOWNEY ASSOCIATES



Peter M. Langtry, R.G., C.E.G.
Principal Environmental Geologist

RLH:PML

Copies: Addressee (2)
Signature Properties
Attn: Ms. Mary Grace Houlihan (1)
Mr. Marc Stice (1)
Alameda County Health Care Services Agency (1)
Attn: Mr. Amir Gholami
Friends of CAL Men's Crew (1)
Attn: Mr. Walter Hallanan
Bingham McCutchen (1)
Attn: Mr. Patrick Shanks
Regents of the University of California (1)
Attn: Mr. Patrick Schlesinger



California Regional Water Quality Control Board

San Francisco Bay Region



Terry Tamminen
Secretary for
Environmental
Protection

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
<http://www.swrcb.ca.gov/rwqcb2>

Arnold Schwarzenegger
Governor

*1/17/04
Costly in money 3/24/04
AG*

March 12, 2004
File No. 01S0576 (BG)

Signature Properties
Attn: Mr. Mark Sticé
4670 Willow Road, Suite 200
Pleasanton, CA 94588

SUBJECT: Conditional Acceptance of: *Soil Removal Completion Report, Groundwater Quality Evaluation and Groundwater Quality Monitoring Work Plan 303 and 315 Derby Avenue, 2909 Glascock Street, Oakland, Alameda County; and Corrective Action Completion Report and Ground Water Monitoring Work Plan, 2901 Glascock Street, Oakland, Alameda County.*

Dear Mr. Stice:

We have reviewed the January 6, 2004, *Soil Removal Completion Report, Groundwater Quality Evaluation and Groundwater Quality Monitoring Work Plan* report for 303 and 315 Derby Avenue and 2909 Glascock Street, Oakland, Alameda County; and the October 6, 2003, *Corrective Action Completion Report and Ground Water Monitoring Work Plan* for 2901 Glascock Street, Oakland, Alameda County (Completion Reports). Review comments by Alameda County Environmental Health (ACEH) are included in this letter.

On the condition that you submit by April 12, 2004, 1) an acceptable revised and combined completion report and 2) an acceptable revised self monitoring program, we accept the Completion Reports. As discussed below, we generally concur that: cleanup of contaminated soil has been carried out to the extent possible within the property boundaries, soil cleanup goals have been met, and groundwater contamination has been reduced below levels of concern for residential occupancy. However, we find the Completion Reports incomplete and request that they be revised (and combined) in response to our comments (attached) and resubmitted. Further, we find the proposed monitoring program unacceptable and request a meeting with your environmental consultant and project manager to develop an acceptable monitoring program.

Background

The 2901 and 2909 Glascock Street and 303/315 Derby Avenue properties are collectively about five acres in size and are located immediately adjacent to the Oakland Estuary.

The 2901 Glascock Street property was developed in 1927 with a 72,000 square foot warehouse that covered most of the property. In 1993, two underground storage tanks (USTs) with

but the confirmation samples DSV 29 – 34 were apparently taken at 7 to 7.5 feet. Were bottom samples collected?

Appendix C:

Disposal documentation is limited to the Class I wastes disposed at the Kettleman Hills Facility. Provide documentation for the other wastes that were disposed and include estimates of contaminant mass removed from the site. Although section 4.2 states that 1,150 tons of Class I waste were removed for disposal, the summary table in Appendix C lists 3,140 tons. This discrepancy should be explained.

Table 1:

Correct the table to reflect the revised TPH-gasoline cleanup level within the Shoreline Protection zone for soil 0-3 ft bgs. Due to nuisance odors encountered during site demolition, it was agreed that shallow soils (0-3 feet) within the Shoreline Protection Zone would be covered with an organic-vapor-impervious liner if confirmation samples detected TPHg at concentrations greater than 100 mg/kg.

Figure 3:

Clearly depict the area along the north side of the property where residual soil concentrations exceed cleanup levels. Clearly depict the area along the eastern side of the property and underlying Glascock Street where residual soil concentrations exceed cleanup levels. This should be discussed in the site management plan and be considered for future building design elements to mitigate vapor intrusion concerns (see Comment 4).

From: Betty Graham [BG@rb2.swrcb.ca.gov]
Sent: Monday, March 01, 2004 12:41 PM
To: amir.gholami@acgov.org; donna.drogos@acgov.org; Roger Brewer
Subject: draft letter to review for Derby Ave and Glascock sites



Derby Ave
Completion Report Re...

Attached is a draft letter responding to the Completion Reports. I e-mailed the attachment to Peter this morning. but will hold off on a draft to Signature until tomorrow. Please mark it up as you see fit and send it back.

Thanks
Betty



California Regional Water Quality Control Board

San Francisco Bay Region



Terry Tamminen
Secretary for
Environmental
Protection

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
<http://www.swrcb.ca.gov/rwqcb2>

Arnold Schwarzenegger
Governor

DRAFT: FOR REVIEW BY BOARD AND ACDEH STAFF, MARCH 1, 2004

March 1, 2004
File No. 01S0576 (BG)

Signature Properties
Attn: Mr. Mark Stice
4670 Willow Road, Suite 200
Pleasanton, CA 94588

SUBJECT: Conditional Approval of: *Soil Removal Completion Report, Groundwater Quality Evaluation and Groundwater Quality Monitoring Work Plan 303 and 315 Derby Avenue, 2909 Glascock Street, Oakland, Alameda County; and Corrective Action Completion Report and Ground Water Monitoring Work Plan, 2901 Glascock Street, Oakland, Alameda County.*

Dear Mr. Stice:

We have reviewed the January 6, 2004, *Soil Removal Completion Report, Groundwater Quality Evaluation and Groundwater Quality Monitoring Work Plan* report for 303 and 315 Derby Avenue and 2909 Glascock Street, Oakland, Alameda County; and the October 6, 2003, *Corrective Action Completion Report and Ground Water Monitoring Work Plan* for 2901 Glascock Street, Oakland, Alameda County (Completion Reports).

As discussed below, we generally concur that: cleanup of contaminated soil has been carried out to the extent possible within the property boundaries, soil cleanup goals have been met, and groundwater contamination has been reduced below levels of concern for residential occupancy. However, we find the Completion Reports incomplete and request that they be revised (and combined) in response to our comments (attached) and resubmitted. Further, we find the proposed monitoring program unacceptable and request a meeting with your environmental consultant and Project Manager to develop an acceptable monitoring program.

On the condition, that you submit, by April 12, 2004, 1) an acceptable revised and combined completion report and 2) an acceptable revised self monitoring program we accept the Completion Reports and concur that cleanup of contaminated soil has been completed to the extent possible within the property boundaries and that groundwater contamination has been reduced below levels of concern for residential occupancy.

Background

The 2901 and 2909 Glascock Street and 303/315 Derby Avenue properties are collectively about five acres in size and are located immediately adjacent to the Oakland Estuary.

The 2901 Glascock Street property was developed in 1927 with a 72,000 square foot warehouse that covered most of the property. In 1993, two underground storage tanks (USTs) with capacities of 4,000 and 20,000 gallons were removed. In 1996 the property was acquired by the John and Charlene Weber Trust and occupied by ICONCO, a demolition contractor. The property is an active fuel UST site under regulatory oversight of the Alameda County Department of Environmental Health (ACDEH). ACDEH recommends transfer of regulatory oversight to the Regional Water Quality Control Board (Board).

The 303/315 Derby Avenue property was developed as a bulk fuel terminal in 1925. It was operated by Shell Oil company from 1925 to 1980 and by Simmons Terminal Corporation from 1980 to 1985. In 1985 the property was acquired by the John and Charlene Weber Trust and occupied by ICONCO, a demolition contractor. The 2909 Glascock Street property was developed with the Cal Crew boathouse. The properties are an active SLIC site under regulatory oversight of the Board.

Signature acquired the 2901 and 2909 Glascock Street and 303/315 Derby Avenue properties in 2003 for purposes of constructing 100 residential townhouse units (Estuary Project) on the northerly portion of the combined property (future parcel 1) and relocating/expanding the existing Cal Crew use on the southerly portion of the combined property (future parcel 2).

During September 2003, Signature initiated activities to demolish site facilities, relocate the historic portion of the Cal Crew boathouse, and remove contaminated soils. The subject Completion Reports were submitted to document completion of soil remediation, to report the results of post excavation soil and groundwater sampling, and to propose a long term monitoring program.

During December 2003, Friends of Cal Crew purchased parcel 2 and commenced construction of facilities for Cal Crew's use.

Soil Remediation

2901 Glascock Street

During September 2003, the warehouse was demolished by ICONCO and contaminated soils were excavated by Pacific States Environmental (PSE), a licensed hazardous waste contractor.

Metal filings were encountered in soils beneath the northwest corner of the warehouse. On September 16 and 17, 2003, PSE over-excavated about 1,800 tons of metal-filing impacted soil. for disposal at the Kettleman Hills Class I landfill.

Petroleum hydrocarbon contaminated soils were encountered in the area of the former 4,000 gallon UST. Petroleum hydrocarbon contaminated soils and free product were encountered in the area of the former 20,000 gallon UST, and a former boiler adjacent to the seawall at the western boundary of the warehouse. About 20 tons, 1,000 tons, and 1,300 tons of contaminated soils were removed from these three areas for disposal at a Class II landfill.

Prior to backfilling, verification soil samples were collected from the sidewalls and base of the excavations. All final verification soil samples were below the cleanup goals. The excavations were backfilled with on-site clayey soils that had been previously characterized as acceptable for on-site soil reuse.

Eleven grab groundwater samples were collected. With the exception of sample GB-1, petroleum hydrocarbon concentrations were below levels of concern for residential occupancy and above levels of concern for ecological protection. These results should be verified through the installation and sampling of monitoring wells.

2909 Glascock Street, 303/315 Derby Avenue

During September and October 2003, the on-site office building, warehouse, wharf and other miscellaneous structures were demolished by ICONCO. Demolition wastes were processed on-site by ICONCO. A portion of the crushed concrete was reused on-site. The remaining demolition wastes were taken off-site for reuse or disposal.

Between October 2, and December 2, 2003, PSE excavated contaminated soil to a depth of seven to nine feet in an approximately 80,000 square-foot area, and excavated soil to a depth of twelve feet in two additional areas.

Several areas of gross petroleum hydrocarbon contamination were encountered during site demolition and soil excavation. These areas were located: beneath the floor of the former fuel dispenser island, underneath most of the concrete pads for the former aboveground storage tanks (AGT), within a gravel filled dewatering trench adjacent to Glascock Street, within a groundwater extraction trench near the Estuary, around storm water catch basins and various subsurface pipelines, and underneath a deep foundation for a former maintenance building. An estimated 32,000 tons of petroleum hydrocarbon contaminated soils were disposed off-site at a Class II disposal facility.

Two undocumented underground storage tanks (UST) were encountered during soil excavation. The tanks were removed under regulatory oversight of the Oakland Fire Department.

An area of about 6,600 square feet within the former AGT area was found to contain brick debris that was profiled as a California hazardous waste (soluble lead). About 1,150 tons of the brick debris were removed and disposed at the Kettleman Hills Class I facility.

About 1,000 pounds of oxygen releasing compound (ORC) were spread at the base of the excavation prior to backfilling. Backfill materials for the excavation included: 2,700 cubic yards of on-site soils, ???? cubic yards of low permeability soils from the Harbor Walk development at Glascock Street and Lancaster Street, and ???? cubic yards of siltstone and mudstone from the La Vista quarry in Hayward, California.

Soil and Groundwater Sampling

Prior to backfilling, verification soil samples were collected from the sidewalls and base of the excavation to confirm the removal of petroleum impacted soil. All final verification soil samples collected inland of the Shoreline Protection Zone were below the cleanup goals. Within the Shoreline Protection Zone, some soils that exceeded the site cleanup goals (100 mg/kg TPHg) were left in place due to geotechnical concerns. These soils will be covered with an organic vapor impermeable liner to control nuisance odors.

To evaluate post excavation groundwater quality, seventeen grab groundwater samples were collected at depths of 12 to 14 feet. With the exception of benzene in sample GB-12, petroleum hydrocarbon concentrations were below levels of concern for residential occupancy and above levels of concern for ecological protection. These results should be verified through the installation and sampling of monitoring wells.

Conditional Report Acceptance

On the condition, that you submit, by April 12, 2004, 1) an acceptable revised and combined completion report and 2) an acceptable revised self monitoring program we accept the Completion Reports and concur that cleanup of contaminated soil has been completed to the extent possible within the property boundaries and that groundwater contamination has been reduced below levels of concern for residential occupancy.

If you have any questions, please contact Amir Gholami at (510) 567-6876 [amir.gholami@acgov.org] or Betty Graham at (510) 622-2358 [e-mail bg@rb2.swrcb.ca.gov].

Sincerely,

Sincerely,

Donna Drogas
LOP Program Manager
ACDEH

Bruce H. Wolfe
Executive Officer
San Francisco Bay RWQCB

Attachment

cc: Mailing List (with Attachment)

Mailing List

Roger Brewer
Keith Lichten

Amir Gholami
ACDEH
131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

Peter Langtry
Lowney Associates
405 Clyde Avenue
Mountain View, CA 94043

Mark Gomez
City of Oakland
Department of Public Works
250 Frank H. Ogawa Plaza
Oakland, CA 94612

Bob Batha
BCDC
50 California Atreet, Suite 2600
San Francisco, CA 94111

Barbara Cook
Department of Toxic Substances Control
700 Heinz Ave., Suite 200
Berkeley, CA 94703

ATTACHMENT

General Comments

1. The report should include discussion/analysis of the mass of contamination removed and the mass of contamination remaining. The former is of interest in terms of characterizing the benefits of the remedial action. The latter is of interest in terms of predicting time needed to reach site closure.
2. The site specific soil cleanup levels presumed a deeper depth for the capillary fringe and a shallower depth of contamination. As a result, a significant mass of contamination remains below a depth of 7 feet bgs. Residual contaminant concentrations using the final verification sidewall and bottom sample results should be clearly delineated on a site plan for the combined site. Color coding may be used to highlight bottom samples that exceeded the soil cleanup goal for a shallower depth interval. For example, samples collected at 7.5 feet bgs that contained more than 1,000 mg/kg TPHt.
3. The groundwater monitoring program proposed in the Completion Reports is not sufficient to verify that contaminant concentrations in groundwater have been reduced across the property to below levels of concern for residential occupancy or that goals for the protection of ecological receptors will be met within a reasonable time period.
4. Prepare a deed restriction to address residual soil and groundwater contamination at the site. The installation of water supply wells on the property should be prohibited. A site management plan is also needed to address disturbance of petroleum-contaminated soil and groundwater during future redevelopment. As discussed in our February 10, 2004, meeting and in lieu of post excavation soil vapor sampling, passive vapor mitigation measures are required for all buildings to be constructed at the site and this requirement should be included in the deed restriction. Separate deed restrictions should be recorded for future parcel 1 (Estuary project) and for future parcel 2 (Cal Crew).
5. Discuss and support laboratory detection limits for VOCs in soil. Laboratory MRLs for VOCs in some soil samples marginally exceeded cleanup levels. While this does not appear to be a significant issue, it should be discussed in the text of the report.
6. The status of construction activities to remediate and recontour the shoreline should be clarified. The letter report on construction activities within the Shoreline Protection Zone should be included in the Completion Report and the area to be covered by the liner should be clearly shown on a site plan.

Detailed Comments

3.2 Facility Demolition:

Expand to describe the extent of gross contamination (visual discoloration/noxious odor) encountered through demolition and excavation and delineate on a site plan for the combined site. Comment on the juxtaposition of former site facilities (AST, pipelines, foundations, trenches, etc.) with areas of gross contamination. The presence and probable source of the nuisance odors encountered during site demolition and excavation should be described. Measures to reduce the impacts of nuisance odors should be included in the Site Management Plan.

4.5 UST Excavation Verification Sampling

The UST removal report should be included as an appendix to the Completion Report.

4.6 Placement of Oxygen Releasing Compound (ORC)

Expand to include discussion/calculation for how the rate of application was determined and whether the application rate was uniform across the site.

5.0 ORC Injection:

Include discussion of the ORC injections that occurred prior to site demolition and comment on the relative effectiveness of ORC at this site.

8.0 Groundwater Monitoring:

The proposed monitoring well network consisting of 8 wells does not provide sufficient well density. Additional wells may be needed: 1) adjacent to Glascock Street (to track contamination coming onto the site due to residual underlying the street); 2) within the shoreline area (For example, the area of the groundwater extraction trench and the "deep foundation" which appear to have the greatest potential for releases to the Estuary); and 3) on the future Cal Crew parcel.

Appendix A:

Figure 2 shows excavation to 10 to 12 feet in the area of the dewatering trench adjacent to Glascock Street (which is consistent with overexcavation of gravel extending to 9 feet) but the confirmation samples DSV 29 - 34 were apparently taken at 7 to 7.5 feet. Were bottom samples collected?

Appendix C:

Disposal documentation is limited to the class I wastes disposed at the Kettleman Hills Facility. Provide documentation for the other wastes that were disposed and include estimates of contaminant mass removed from the site. Although section 4.2 states that 1,150 tons of Class I waste were removed for disposal, the summary table in Appendix C lists 3,140 tons. This discrepancy should be explained.

Table 1:

Correct the table to reflect the revised TPH-gasoline cleanup level within the Shoreline Protection zone for soil 0-3 ft bgs. Due to nuisance odors encountered during site demolition, it was agreed that shallow soils (0-3 feet) within the Shoreline Protection Zone would be covered with an organic vapor impervious liner if confirmation samples detected TPHg at concentrations greater than 100 mg/kg.

Figure 3:

Clearly depict the area along the north side of the property where residual soil concentrations exceed cleanup levels. Clearly depict the area along the eastern side of the property and underlying Glascock Street where residual soil concentrations exceed cleanup levels. This should be discussed in the site management plan and be considered for future building design elements to mitigate vapor intrusion concerns (see Comment 4).

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

RO0000437

February 4, 2004

Ms. Mary Grace Houlihan
Signature Properties
4670 Willow Road, Suite 200
Pleasanton, CA 94588


**Subject: Fuel Leak Case #RO0000437, Glascock Ave Warehouse, 2901 Glascock Ave,
Oakland, CA 94601**

Dear Ms. Houlihan:

I am in receipt of your email dated February 3rd, 2004. Per my discussion with Peter Langtry of Lowney & Associates, Alameda County Environmental Health (ACEH) office is reviewing all the reports and conferring with the Regional Water Quality Control Board (RWQCB). ACEH will issue a response as soon as our review processes are completed.

If you have any questions, please call me at 510-567-6876.

Sincerely,


Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Peter Langtry, Lowney Associates, 167 Filbert Street, Oakland, CA 94607
D. Drogos, A. Gholami

120437

Date: January 30, 2004

Project No.: 1731-2G

To: Amir Gholami
ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
1131 Harbor Bay Parkway
Alameda, California 94502

RE: 2901 GLASCOCK STREET

Alameda County

FEB 04 2004

Environmental Health

Dear Amir,

Enclosed is another copy of the October 6, 2003 soil removal completion report for 2901 Glascock Street. We understand that you are not able to locate your copy, which was hand delivered by myself to your office on October 7. We understand that you have a large project load. Thanks again for your time on this project!

In order to help clarify the status of your review of the site, here is a brief summary of our discussions/correspondence regarding the soil completion reports and ground water monitoring work plan.

- We discussed the findings of the report by telephone on October 13, 2003. During our conversation you requested plots of petroleum concentrations in ground water versus distance; the plots were sent to you by California Overnight on October 13.
- We met with you on-site on November 5, 2003, during which we briefly discussed the October 6 completion report.
- We subsequently sent emails to you on November 21 and December 1, 2003 requesting the status of your review of the completion report.
- Based on our conversations with you and Donna Drogos on December 4, we understand that additional soil removal and sampling is not required, but that your department is holding off approving the ground water monitoring plan until the California Regional Water Quality Control Board (CRWQCB) staff completes their review of the cleanup completion results.
- We received confirmation from you on January 14, 2004 that you received the January 6, 2004 soil removal completion report, which included a revised ground water monitoring work plan for 2901 Glascock Street.

We look forward to meeting with you February 10 to discuss the County's cleanup approval letter and long term monitoring requirements at the site.

MOUNTAIN VIEW
405 Clyde Avenue
CA 94043
T: 650.967.2365
F: 650.967.2785

FAIRFIELD
2850 Cordelia Road
Suite 140
CA 94534
T: 707.423.2523
F: 707.428.1725

OAKLAND
167 Filbert Street
CA 94607
T: 510.267.1970
F: 510.267.1972

SAN RAMON
2258 Camino Ramon
CA 94583
T: 925.275.2550
F: 925.275.2555

FULLERTON
251 E. Imperial Hwy
Suite 470
CA 92835
T: 714.441.3090
F: 714.441.3091

Very truly yours,

Lowney Associates

Peter Langtry, C.E.G.

Principal Environmental Geologist

plangtry@lowney.com

Copies: Addressee (1)
Signature Properties (1) w/o enclosure
Attn: Ms. Mary Grace Houlihan
California Regional Water Quality Control Board (1) w/o enclosure
Attn: Ms. Betty Graham
Alameda County Health Care Services Agency (1) w/o enclosure
Attn: Ms. Donna Drogos



RO 437

IT Corporation

1921 Ringwood Avenue
San Jose, CA 95131-1721
Tel. 408.453.7300
Fax. 408.437.9526

A Member of The IT Group

May 1, 2002

Mr. Gary Martz
Iconco
303 Derby Avenue
Oakland, California 94601

Post-It™ brand fax transmittal memo 7671		# of pages > 2
To BARNESY CHAN	From G. MARTZ	
Co. ALAMEDA COUNTY	Co. ICONCO	
Dept. HEALTH CARE	Phone # 261-1900	
Fax # 337-9335	Fax # 261-1918	

RECEIVED
MAY 03 2002

Dear Mr. Martz:

As you may be aware, earlier this year The Shaw Group announced their intention to acquire The IT Group. On Thursday, April 18, 2002, they were the successful bidder for The IT Group businesses at the bankruptcy auction, and on April 19th the U.S. Bankruptcy Court approved the sale. On Wednesday, April 24th, the court finalized the language of the sale order and the closing is expected to take place shortly. As a valued customer, I wanted to take this opportunity to formally introduce you to The Shaw Group.

As background, The Shaw Group is the world's only vertically integrated provider of comprehensive engineering, procurement, fabrication and construction services. Shaw had more than 15,000 employees around the world before consummating this transaction, and has been involved directly in the environmental and infrastructure arena since the acquisition of Stone & Webster in 2000. Stone and Webster, of course, brings over 35 years of expertise in the environmental business to the organization.

Shaw is publicly traded on the New York Stock Exchange under the symbol SGR. In addition to access to the public markets, Shaw's strong balance sheet brings the financial stability that will allow the Environmental & Infrastructure business to move forward as a top competitor in the industry.

With The IT Group acquisition, Shaw is dramatically expanding their environmental and infrastructure services capabilities. This business is strategically important to Shaw's future growth and they're in it for the long term.

The IT Group, together with the Stone & Webster Environmental and Infrastructure business, will become a new division within Shaw and the name will change to Shaw Environmental and Infrastructure. This new division will be an important contributor to Shaw's growth going forward.

I want to assure you that providing excellent customer service is an integral part of the Shaw corporate culture. As The IT Group becomes a part of The Shaw Group, our top priorities will be to continue to provide consistent high-quality service and to maintain the excellent business relationships with our clients.

Shaw has a history of growth through acquisition and an excellent track record of integrating new companies into the organization quickly and effectively to minimize disruptions. Furthermore, Shaw has specific expertise and success in acquiring, integrating and growing financially distressed companies. The most recent example is Stone & Webster. Shaw will focus on maintaining the practices you are used to with The IT Group, while building upon them further.

We appreciate that the uncertainty regarding the IT Group and the bankruptcy process itself has been disruptive. We are working very hard to make the transition smooth and transparent to our customers. I want to thank you for your dedication and commitment to The IT Group and your trust in The Shaw Group's intentions. We will not lose sight of the fact that our business success is based on your satisfaction. Thank you for your patience thus far.

The Shaw Group is excited about its ongoing relationship with Iconco and the ability to provide additional services through other Shaw operations. We believe that our expanded, long-term business relationship will be productive and mutually beneficial.

Sincerely,



Andrew D. Lehane

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

January 8, 2002
StID 1138/ RO0000437

Mr. Gary Martz
ICONCO
303 Derby Ave.
Oakland CA 94601

Re: 2901 Glascock Street Property, Oakland CA 94601

Dear Mr. Martz:

Our office has received and reviewed the Third and Fourth Quarter monitoring reports for the referenced property prepared by the IT Group. As you are aware, your consultant believes that the elevated gasoline, diesel and motor oil concentrations reported during the 3/01 and 6/01 sampling events may have been a result of laboratory error rather than indicating a change in site conditions. Therefore, my request for additional site remediation is stated as being not warranted. The recent 11/01 sampling event performed by a new laboratory yielded low contaminant levels supporting this theory. Because of these results, our office agrees that groundwater monitoring should continue to confirm this theory. Oxygen releasing compound (ORC) socks should be replaced as necessary in the appropriate wells at the site. After two additional groundwater samplings, you may continue on the prior program agreed upon at the Water Board meeting, ie removal of the ORC socks and an additional year of monitoring to establish the concentration trend.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

✓ C: B. Chan, files

Mr. A. Lehane, IT Corporation, 1921 Ringwood Ave., San Jose, CA 95131-1721

2901 Glascock St



ICONCO • 303 DERBY AVENUE • OAKLAND, CALIFORNIA 94601
(510) 261-1900 • FAX (510) 261-2459

JAN 02 2002

December 27, 2001

#1138

Mr. Barney Chan
Alameda County Health Care Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

Dear Barney:

Enclosed please find IT Group's quarterly Reports for the third and fourth quarters, 2001, which were received on December 21.

According to Andrew Lehane, IT Group's Senior Engineer, the results of the remediation have improved considerably since the Second Quarter Report.

Please feel free to contact me if you have any questions or comments.

Sincerely,

Gary U. Martz
Business Manager



OCT 26 2001

IT Corporation

1921 Ringwood Avenue
San Jose, CA 95131-1721
Tel. 408.453.7300
Fax. 408.437.9526

A Member of The IT Group

October 19, 2001
Project 805385

Alameda County Health Care Services Agency (ACHCSA)
1131 Harbor Bay Parkway, Suite 250
Alameda, California 91502-6577
Attn: Mr. Barney Chan

Re: **Response to ACHCSA Letter Dated September 27, 2001**
2901 Glascock Street
Oakland, California

Dear Mr. Chan:

This letter has been prepared for ICONCO by IT Corporation (IT) in response to a letter from the Alameda County Health Care Services Agency (ACHCSA) dated September 27, 2001. The ACHCSA letter requested that a work plan for additional remediation be submitted by October 29, 2001.

As you and I discussed during a telephone call today, IT believes it would be prudent to stay with the existing site clean up strategy for at least one additional quarter, since the overall groundwater trend continues to show a decline in residual concentrations. The second quarter monitoring results were inconsistent with those of other recent quarters, which may be an anomaly, rather than an indication that there is a significant change in the overall trend. Additional monitoring results will help to resolve this issue.

This letter is to confirm your verbal agreement with our proposal to delay the requirement for a work plan for at least one quarter, so that additional monitoring data will be available to evaluate the progress toward site cleanup goals.

In addition, IT will be working closely with the analytical laboratory to ensure that special care is taken in the preparation and analysis of groundwater samples for this site. As we discussed in our phone call, suspended particles in groundwater at this site may skew analytical results for dissolved hydrocarbons if special care is not taken.

IT appreciates your timely review of this submittal and welcomes any comments or questions you may have. Please feel free to contact me at (408) 350-5648 to discuss this submittal.

Sincerely,

Andrew D. Lehane
Senior Engineer

cc: Mr. Gary Martz, Iconco



ICONCO • 303 DERBY AVENUE • OAKLAND, CALIFORNIA 94601
(510) 261-1900 • FAX (510) 261-2459

September 24, 2001

SEP 27 2001

Barney M. Chan
Alameda County Health Care Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

Re: 2901 Glascock Street Toxic Cleanup Second Quarter Report, 2001.

Dear Barney:

Enclosed, please find a copy of the above report for your records. I have been assured by Andrew Lehane, the IT Group, that we would receive future reports on a more timely basis.

Please feel free to contact John Weber or myself if you have any questions or comments.

Sincerely,

A handwritten signature in blue ink that reads "Gary U. Martz".

Gary U. Martz
Business Manager

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

September 27, 2001
StID 1138/ RO0000437

Mr. Gary Martz
ICONCO
303 Derby Ave.
Oakland CA 94601

Re: 2901 Glascock Street, Oakland CA 94601, Underground Tank Investigation

Dear Mr. Martz:

Our office has received and reviewed the September 4, 2001 Second Quarter Monitoring report prepared by IT Corporation. Although the results of this sampling are within the historical highest reported concentrations, they are significantly higher than results immediately preceding this sampling event. They are also much greater than the recommended clean-up levels outlined in the San Francisco Airport Water Board order. I recommend that you review my November 16, 2000 letter to Mr. Richard Croop, which summarizes items discussed in a Water Board meeting with Mr. Croop, Mr. Chuck Headlee of the Water Board and Mr. Lehane of IT Corporation. This meeting gave a schedule and path for site closure.

Based upon the reported Second Quarter analytical results, it appears that residual petroleum contamination remains in soil and continues to leach into groundwater. This contamination will require remediation before the desired clean-up levels can realistically be met. It will also require more than just the replacement of the oxygen-releasing compound (ORC) socks in the impacted wells as recommended by IT Corporation. Originally, the amount of ORC added through injection into borings near the petroleum impacted areas was determined to be the amount necessary to prevent the migration of the petroleum plume. This assumed a limited amount of residual contamination, which would be depleted over time. If this were the case, groundwater concentrations would decrease over time. Since this is not happening, additional remediation is necessary to treat the **entire** amount of residual contamination. **Please discuss remedial options with your consultant and provide a work plan for additional site remediation within 30 days or no later than October 29, 2001.** Presently, the conditions necessary to proceed toward closure do not exist.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. Lehane, IT Corporation, 1921 Ringwood Ave., San Jose, CA 95131-1721

Addrem2901Glascock

E. B. FIELD COMPANY

SINCE 1921
REAL ESTATE

TELEPHONE (510) 444-1391
FAX (510) 444-1394
436 FOURTEENTH STREET, SUITE 305
OAKLAND, CALIFORNIA 94612

April 16, 2001

Re over 437

Mr. Barney Chan, Specialist
Hazardous Materials
ALAMEDA COUNTY HEALTH CARE SERVICES
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94501-6577

APR 18 2001

Subject: 2901 Glascock St.
Oakland, CA

(1138)

Dear Mr. Chan:

We finally sold 2901 Glascock Street to Mr. John Weber of Iconco whose address is 303 Derby Avenue, Oakland, CA., 94601. His right-hand man is Gary Martz, Phone: (510) 261-1900.

I appreciate the efforts you have put into this project during the past 5 or 6 years and I hope that Mr. Weber will be able to get a clean bill of health in the near future.

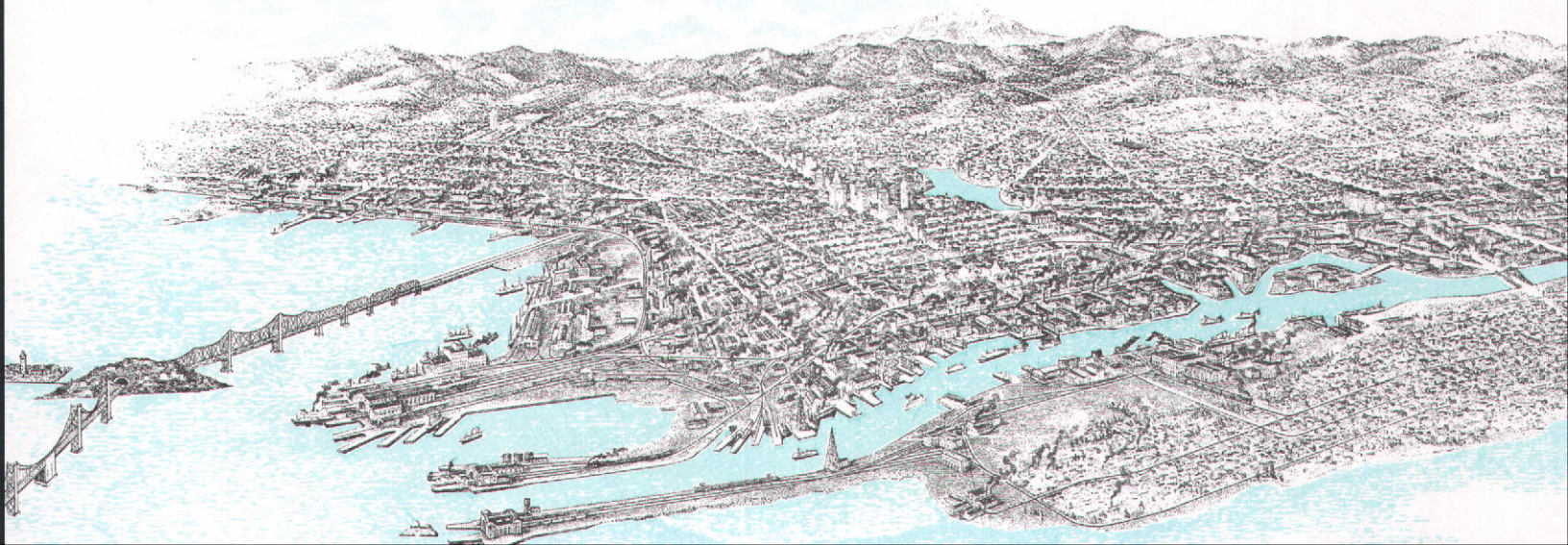
Please call me if there are any questions.

Sincerely yours,

R. C. Croop

R. C. Croop

RCC:lap



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



November 16, 2000
StID # 1138

Mr. Richard Croop
Glascock Street Properties
C/o E. B. Field Company
436 14th St., #805
Oakland CA 94612-1394

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

Re: Water Board Meeting for 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Croop:

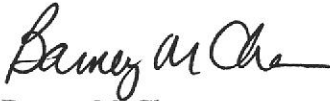
This letter serves to summarize my understanding of the status and future requirements for the above referenced site as discussed in our November 14, 2000 meeting at the Regional Water Quality Control Board (Water Board). The following items were discussed:

- One year of quarterly groundwater monitoring was suggested. The addition of oxygen releasing compound (ORC) in the form of socks in wells and as a slurry injection is believed to require this additional treatment time. To monitor the residual amount of ORC in the socks, the dissolved oxygen reading prior to purging will be used to determine when the socks should be replaced.
- After the year of monitoring, the ORC socks will be removed and an additional year of quarterly monitoring will be done to verify stable or decreasing conditions.
- Tentative cleanup levels were discussed. The Tier 1 diesel concentration of 640 ppb in groundwater from the San Francisco Airport order was proposed. Although this is the primary chemical of concern, please be aware that gasoline, BTEX (benzene, toluene, ethyl benzene and xylenes) and motor oil have also been reported in groundwater and should also be evaluated to the Airport numbers. MTBE, which has been found, is likely from an off-site source.
- Dissolved oxygen readings will be taken before and after purging and sampling to demonstrate that the groundwater samples are representative of actual groundwater conditions.
- Bio-parameters are to be tested in forthcoming monitoring events. In addition to dissolved oxygen, please run the following parameters; oxidation-reduction potential, nitrates, sulfates and ferrous iron. Naturally, an evaluation of these bio-indicator results should be included in your monitoring reports.
- There will be an attempt to research several statistical trend analysis methods including linear regression and Mann Kendall analyses. The recommended method, based on the research, should be used to determine trend. If a stable or decreasing trend of concentrations less than the clean-up requirement is not shown, active remediation will be required.

Mr. R. Croop
2901 Glascock Ave., Oakland 94601
StID # 1138
November 16, 2000
Page 2

Please contact me at (510) 567-6765 if you have any comments or questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C. B. Chan, files

Mr. A. Lehane, IT Corporation, 1921 Ringwood Ave., San Jose, CA 95131-1721

Mr. C. Headlee, RWQCB

Mr. J. Weber, ICONCO, 303 Derby Ave., Oakland CA 94601

Stat2901Glascock

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

October 26, 2000
StID # 1138

Mr. Richard Croop
E. B. Field Company
436 14th St., Room 805
Oakland CA 94612-1394

Re: Status of Environmental Investigation at 2901 Glascock Ave., Oakland 94601

Dear Mr. Croop:

This letter is meant to inform you of the County's response to recent letters from your consultant, the IT Group. On several occasions, most recently in their October 6, 2000 letter, the IT Group has summarized the past activities at this site and recommended "monitored natural attenuation" (MNA) as the appropriate remedial action for this site.

The County has discussed this site with Mr. Chuck Headlee of the Regional Water Quality Control Board (RWQCB) and at this time, we are not convinced that this is the most appropriate remedial approach for this site. As you may be aware, MNA is an acceptable EPA recommended approach, however, its use is recommended only when specific site conditions have been met. One requirement is that the burden of proof for justifying this approach is on the proposer of this remedial action. Therefore, our offices have notified your consultant that we would like to meet with him to discuss the merits of MNA. This meeting should be scheduled during the second week of November, if possible. Please contact your consultant to schedule a time and date acceptable to all attendees.

Some items, which should be provided or demonstrated at the meeting, are the following:

- Demonstration of declining contaminant concentrations
- Demonstration of source removal, estimation of residual soil and groundwater contamination at site
- Demonstration that remedial objectives will be reached within a reasonable time frame
- Verification that clean-up levels have been met and are protective of human health and the environment
- Demonstrate that MNA is occurring and provide a measure of its effectiveness
- Contingency plan and indicator of unacceptable performance of MNA

For further information you may contact the Center for Public Environmental Oversight at (415) 904-7751 or the EPA website @ <http://www.epa.gov/swerust1/directiv/index.htm>.

Mr. Richard Croop
October 26, 2000
StID # 1138
2901 Glascock Ave., Oakland
Page 2

Please contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. Lehane, IT Corporation, 1921 Ringwood Ave., San Jose, CA 95131-1721
Mr. C. Headlee, RWQCB

MNA2901Glascock

IT Corporation

1921 Ringwood Avenue
San Jose, CA 95131-1721
Tel. 408.453.7300
Fax. 408.437.9526

A Member of The IT Group



October 6, 2000
Project 805385

Alameda County Health Care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 91502-6577
Attn: Mr. Barney Chan

Re: **Response to Letter Dated August 25, 2000**
Former Dorr-Oliver Site
2901 Glascock Street
Oakland, California

This letter has been prepared for Glascock Street Properties by IT Corporation (IT) in response to a letter from the Alameda County Health Care Services Agency (ACHCSA) dated August 25, 2000. The ACHCSA letter requested that quarterly monitoring be continued at the site and that a remediation work plan be submitted by October 10, 2000.

This letter is to notify the ACHCSA that quarterly monitoring for the third quarter of 2000 has been performed; analytical results are not yet available. A report will be prepared and submitted to the ACHCSA after receipt of those results.

IT has reviewed remedial action performed to date and groundwater monitoring trends to develop a proposed remedial strategy for the site. The following sections address that issue.

Remedial Action to Date

Two underground storage tanks were excavated and removed from the northeastern portion of the property in February 1993. Several investigations were subsequently performed by W. A. Craig, Inc. During those investigations, 7 groundwater monitoring wells were installed and approximately 18 soil borings and 2 test pits were performed. Pacific Environmental Group, Inc.¹ (PEG) performed additional investigation in 1995, which included the installation of one groundwater monitoring well and 14 soil borings. Groundwater monitoring has been ongoing at the site since the fourth quarter of 1994.

During the third and fourth quarter of 1996, remedial excavations were performed in three areas inside the warehouse to address near surface soils with elevated concentrations of total petroleum hydrocarbons quantified as diesel (TPH-d). In

¹ Pacific Environmental Group, Inc. was acquired by The IT Group and is now a part of IT Corporation

00 OCT 18 PM 3:45
ENVIRONMENTAL PROTECTION

addition, one area outside the warehouse was excavated to remediate near surface soils with elevated TPH-d and PCBs. Confirmation samples collected from excavation areas demonstrated compliance with the soil cleanup goals established in PEG's remedial work plan which was approved by the ACHCSA.

Beginning in 1997, Oxygen Release Compound (ORC®) has been utilized in wells MW-1, MW-2, and MW-6 to enhance bioremediation. In the third quarter of 1999, PEG installed 15 remediation borings backfilled with ORC® slurry, in accordance with a remedial work plan approved by the ACHCSA.

Groundwater Monitoring Trends

IT has analyzed groundwater trends from MW-1, MW-2, and MW-6, and performed linear regression analysis to project cleanup time for TPH-d at the site based on groundwater monitoring data. The projected time to reach the cleanup goal of 640 micrograms per liter ($\mu\text{g/l}$) TPH-d varied from approximately 1 to 5 years using this methodology. Recent groundwater monitoring data from the June 30, 2000 sampling event actually indicates all site monitoring wells except MW-2 (the furthest on-site well from the estuary) were below the cleanup standard of 640 $\mu\text{g/l}$ TPH-d.

Contrary to the ACHCSA's assertion, the proximity of MW-6 to estuary does not indicate concentrations at MW-6 are representative of impact from the site which could be observed in estuary. Based on hydrogeologic conditions at the site, groundwater flux from site is expected to be on the order of gallons per day, while surface water flow in the estuary is estimated to be on the order of millions of gallons per day. Given the orders of magnitude difference in water flow rates, it is highly unlikely that detectable concentrations of constituents of concern emanating from the site could be found in the estuary.

Poor
Logic

Remedial Strategy

IT evaluated various options for remedial action at the site. Considering the extensive remedial efforts to date to remove both primary and secondary sources at the site, the hydrogeologic conditions at the site, the generally low concentrations observed, and the considerable expense of other alternatives, IT has selected monitored natural attenuation with limited enhanced bioremediation as the proposed remedial strategy for this site.

This alternative has been selected considering the State's criteria that the selected remedial strategy be "cost effective". Other remedial alternatives were considered and were judged unlikely to achieve the groundwater cleanup goals within a comparable time frame without being significantly more expensive. We recognize that ACHSCA had indicated a preference for a more active remedial plan, but in our professional opinion site conditions and remedial selection criteria justify this plan. An independent review of site conditions by another consulting firm came to the same conclusions².

² Letter from W. A. Craig, Inc., to Mr. John Weber of ICONCO, Inc., July 31, 2000.

October 6, 2000

Page 3

To implement this strategy, groundwater monitoring would continue until it has been demonstrated that all wells are below the established groundwater cleanup goals for TPH-d, or are likely to reach that threshold within a reasonable time frame. Currently, concentrations of TPH-d in site monitoring wells are below that threshold, with the exception of Well MW-2 (the on-site well furthest from the estuary). ORC® would continue to be implemented at wells MW-1, MW-2, and MW-6 for another 2 quarters while groundwater trends are monitored.

IT appreciates your timely review of this submittal and welcomes any comments or questions you may have. Please feel free to contact me at (408) 350-5648 to discuss this submittal.

Sincerely,



Andrew D. Lehane

Senior Engineer

RCE 55798

cc: Mr. Dennis Buran
Mr. Richard Croop

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



August 25, 2000

StID # 1138

Mr. Richard Croop
E. B. Field Company
436 14th St., Room 805
Oakland CA 94612-1394

ENVIRONMENTAL HEALTH SERVICES

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

Re: 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Croop:

Our office has received and reviewed the July 12, 2000 correspondence from the IT Group regarding their opinion on the above site. IT proposes that current action at this site be limited to groundwater monitoring only. I have discussed this site with Mr. Chuck Headlee of the San Francisco Regional Water Quality Control Board (SFRWQCB) and our offices do not concur with your consultant's proposal. Because this site is located directly adjacent to the Oakland-Alameda estuary, groundwater contamination from this site is impacting this surface water. A fairly good estimation of the concentration of this petroleum is that which has been reported in monitoring well MW-6, which lies only a few feet from the estuary.

It is also apparent from both soil and groundwater analysis that the areas of the former underground tanks have considerable residual diesel contamination. These areas continue to be a source of diesel fuel that will eventually migrate to the estuary. Because of this, you are requested to propose some type of active remediation to prevent continual discharge to the estuary. Our office recommends that you consider several options, which may include any one or a combination of the following or others:

- Addition of oxygen releasing compound to a larger area.
- Addition of chemical oxidation compounds.
- Limited hot spot excavation
- Interception trench or barrier.

Our office also recommends that you contact and apply to the State Water Resources Control Board Underground Storage Tank Cleanup Fund (Cleanup Fund) for potential reimbursement of your remediation expenses. You may obtain an application by calling (916) 227-4307 or through the help of your consultant. **Please continue your quarterly monitoring and provide a remediation work plan within 45 days or no later than October 10, 2000.** You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C. B. Chan, files

Mr. E. Garner, IT Corporation, 1921 Ringwood Ave., San Jose, CA 95131
Mr. C. Headlee, RWQCB

remed2901Glascock



July 12, 2000
Project 805385

Mr. Barney Chan
Alameda County Health Care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 91502-6577

Re: **Response to Letter Dated June 2, 2000**
Former Dorr-Oliver Site
2901 Glascock Street
Oakland, California

Dear Mr. Chan:

This letter has been prepared for Glascock Street Properties by IT Corporation (IT) in response to a letter from the Alameda County Health Care Services Agency dated June 2, 2000. The options for continued treatment of the existing plume at the site which were discussed in the April 19, 2000 meeting, which included Mr. Erin Garner of IT, are limited by the hydrogeological conditions found at this site. The fact that the contamination is of generally low concentration and appears to be both widespread and without a specific primary source and that onsite migration of contaminants which are originating from offsite sources continues, coupled with the cyclic nature of contamination, suggests that the estuary itself may have a profound effect on the distribution of the plume and the fluctuating concentrations. A graphical representation of diesel concentrations found at Monitoring Well MW-1 over the last five years highlights the overall downward trend in concentrations (Figure 1).

IT continues to believe that while further and expanded chemical treatment may accelerate contaminant reduction in a localized way, overall reduction of the plume would not be greatly affected, certainly not in relation to the substantial cost which would be required and in light of the expected length of continued monitoring at this site. We therefore do not feel that further remedial action would be effective, and propose that current action be limited to groundwater monitoring.

Sincerely,

Suzanne McClurkin-Nelson
Project Scientist

Attachments: Figure 1 - Well MW-1 TEPH-d Concentrations Over Time

cc: Mr. Richard Croop, E.B.Field Company, 436 14th Street, Room 805, Oakland, California 94612-1394
Mr. Dennis Buran, Glascock Street Properties, 383 Diablo Road, Suite 100, Danville, California 94526

ENVIRONMENTAL
PROTECTION

00 JUL 17 PM 12:55

IT Corporation

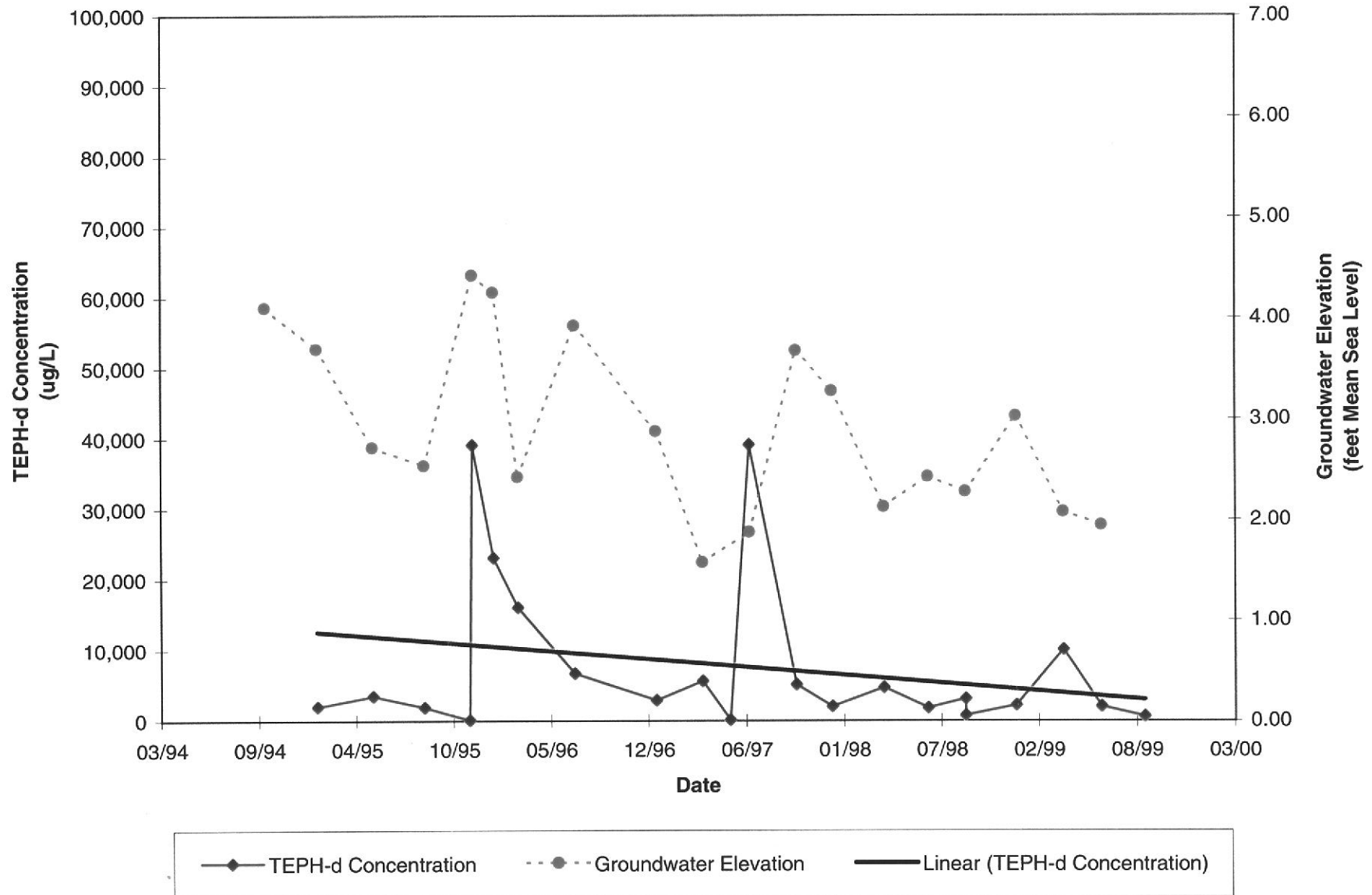
1921 Ringwood Avenue
San Jose, CA 95131-1721
Tel. 408.453.7300
Fax. 408.437.9526

A Member of The IT Group

1138

Figure 1
Well MW-1 TEPH-d Concentrations Over Time

Former Dorr-Oliver Site
2901 Glascock Avenue
Oakland, California



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

June 2, 2000
StID # 1138

Mr. Richard Croop
E. B. Field Company
436 14th St., Room 805
Oakland CA 94612-1394

Re: 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Croop:

I have received and reviewed the May 11, 2000 Quarterly Report for the first quarter year 2000 for the above site as prepared by the IT Group. This monitoring event occurred on March 3, 2000, before our April 19th meeting at the County offices.

As you may recall from this meeting, the soil and groundwater diesel concentrations were in excess of that recommended by the Water Board's order #99-045 ie 518 ppm in soil and 640 ppm in groundwater. The results of the March 3rd monitoring continue to show elevated diesel in wells, including well MW-6, which is only a few feet from the Oakland-Alameda estuary. It is likely that the residual soil contamination from the releases from the former fuel tanks continues to act as a source of the diesel found in groundwater. The monitoring well data sheets indicate sheen on the water in several of the wells in addition to petroleum odors.

The options mentioned in my April 19th letter were to add oxygen releasing compounds or chemical oxidants such as hydrogen peroxide. Obviously, soil excavation, though effective, was not considered a "reasonable" alternative. The May 11th monitoring report recommended the replacement of oxygen-releasing socks into wells MW1, 2 and 6. Though this may be helpful, it would not treat the majority of the petroleum release. The socks have a limited affect in the groundwater in a limited radius around the well in which it is added. This would have only a gradual effect on treating the contamination. Please consider a larger area and amount of chemical treatment for this site. I would remind you that the initial amount of oxygen releasing compound added was calculated to prevent the migration of a petroleum plume **not** to treat the entire mass of the plume.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

✓ C: B. Chan, files

Mr. E. Garner, IT Corporation, 1921 Ringwood Ave., San Jose CA 95131

2-2901Glascock

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

April 19, 2000
StID # 1138

Mr. Richard Croop
E. B. Field Company
436 14th St. Room 805
Oakland CA 94612-1394

Re: 2901 Glascock Ave., Oakland CA94601

Dear Mr. Croop:

This letter serves to recount our meeting today at the County's office. Mr. Erin Garner, your consultant from IT Corporation was also present. We discussed the current status, clean-up goals and remediation options. The following observations summarize our meeting:

- The presence of methyl tertiary butyl ether (MTBE) in groundwater at this site was agreed to have originated from off-site. The current concentrations in groundwater are not a human health or ecological health concern.
- Our office is using the recommendations of the Water Board's Order No. 99-045 (SFIA Order), as guidance for soil and groundwater clean-up goals since the setting of this site is somewhat similar to the San Francisco Airport. This Order recommends the ecological clean-up levels of a maximum soil concentration of 518 parts per million (ppm) and the maximum groundwater concentration of 640 ppm. The Water Board would like to see groundwater concentrations consistently below this clean-up prior to closing this site. Four quarters of consistent concentrations would be considered a trend. -TPH d
- Because the groundwater concentrations have exceeded this clean-up level, your options are either continued groundwater monitoring or monitoring with active remediation. Active remediation options include the addition of oxygen releasing material or the addition of chemical oxidants such as hydrogen peroxide. The addition of these chemicals would likely shorten the required time for monitoring. Should you decide to continue monitoring, you can verify that natural bio-remediation is occurring by measuring groundwater parameters such as dissolved oxygen, oxidation-reduction potential, nitrates, sulfates and ferrous iron.

Please inform our office of your choice of remediation options. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. E. Garner, IT Corporation, 1921 Ringwood Ave., San Jose, CA 95131
2901Glascockstatus

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700
(510) 337-9432

December 8, 1999
StID # 1138

Mr. Dennis Buran
Glascock Street Properties
383 Diablo Road, Suite 100
Danville, CA 94526

Re: Former Dorr-Oliver Site, 2901 Glascock St., Oakland CA 94601

Dear Mr. Buran:

Our office has received and reviewed the December 1, 1999 Third Quarter 1999 groundwater monitoring report for the above site as prepared by the IT Group (IT). This is the first monitoring event after the injection of the oxygen releasing compound (ORC) injections, performed in August of this year, and there appears to a significant decrease in the total petroleum hydrocarbons (diesel and gasoline) concentrations in groundwater. In addition, the report states that ORC socks were placed into wells MW-1, MW-2 and MW-6 the same day as the monitoring occurred. You are reminded to take dissolved oxygen readings in all wells to support the assumption that the increased dissolved oxygen is resulting in enhanced bio-remediation of TPH in groundwater. In addition, please be sure to remove the ORC socks and purge the monitoring well prior to sampling.

You may have your consultant contact me to schedule the requested meeting with our office. Should you request site closure, please provide your site-specific recommendation for the cleanup level for TPH as motor oil as recommended by the Water Board.

Please contact me at (510) 567-6765 with any comments or questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Ms. D. Sarmiento, The IT Group, 1921 Ringwood Ave., San Jose, CA 95131-1721
Mon2901Glascock

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

September 14, 1999
StID # 1138

Mr. Dennis Buran
Glascock St. Properties
383 Diablo Road, Suite 100
Danville, CA 94526

Re: Quarterly Report for 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Buran:

As mentioned in the Second Quarter 1999 monitoring report for the above site, in August this year, your consultant performed the injection of oxygen-releasing compound (ORC) into a number of borings at this site. It is anticipated that this will enhance natural bio-remediation at the site by increasing the dissolved oxygen concentration in groundwater. Therefore, please be sure to take dissolved oxygen readings in all well in your future monitoring events. If ORC socks are still in any of the wells, please remove from the well and purge the well before sampling for dissolved oxygen. You should also measure the oxidation-reduction potential reading in the same samples.

Please call me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. Lehane, IT Group, 1921 Ringwood Ave., San Jose, CA 95131-1721
D0mon2901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

July 23, 1999
StID #1138

Mr. Dennis Buran
Glascock St. Properties
425 Market St.
Oakland CA 94607

**Re: Request for the Installation of Oxygen Releasing Compound Injections at 2901
Glascock Ave., Oakland CA 94601**

Dear Mr. Buran:

This letter requests that you implement **within the next 30 days, or no later than August 26, 1999**, the approved work plan for the injection of oxygen releasing compound (ORC). There was some debate as to the appropriate amount of ORC to be added to each boring. Our office and your consultant each had their own rationale for their estimate. However, to expedite this work, please proceed with the work plan as described in Pacific Environmental Group's January 25, 1999 report. Certainly, if the dissolved diesel concentration does not fall to acceptable levels, you may need to re-inject additional ORC.

Please contact our office 72 working hours prior to this work. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files

Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose, CA 95110-1006
ORCimp2901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

March 30, 1999
StID # 1138

Mr. Dennis Buran
Glascock Street Properties
425 Market St.
Oakland CA 94607

**Re: Work Plan for the Addition of Oxygen Releasing Compound at 2901 Glascock Ave.,
Oakland CA 94601**

Dear Mr. Buran:

Our office has received the March 23, 1999 Pacific Environmental Group (PEG) reply to my request for clarification as to the amount of oxygen releasing compound (ORC) necessary to treat the diesel contamination at the above site. I have also spoken with Regenesis, the supplier of ORC, to get their technical opinion. The difference in the amount of ORC estimated by our office and that by PEG is due partially to a different estimation of the size of the release and to a larger part to the approach used to determine the amount of ORC necessary. The County's estimate was based upon the amount of ORC required to treat the entire contaminant plume while PEG's estimate is based upon the amount of ORC needed to form a barrier to prevent migration to the estuary. Their estimation assumes a smaller plume and less contribution by the absorbed petroleum from the soil. As mentioned by PEG, using the ORC slurry barrier method, there still may be residual contamination left at the site, hopefully, below any action limits.

You may initiate the work plan as soon as possible. Please contact me at (510) 567-6765 prior to this work.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

✓ Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose, CA 95110-1006

ORCap2901



PACIFIC ENVIRONMENTAL GROUP, INC.

R0437



FACSIMILE TRANSMITTAL

Date: 3/24/99 Project #: 360-014-2B

To: Barney Chan Fax: (510) 337-9335

ACHCSA

From: Andrew Lehane

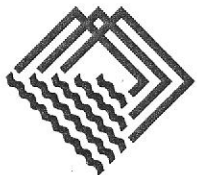
If you have any problems receiving this facsimile, please call (408) 441-7500

Sheets to follow cover page:

3

Attachments:

Comments: Please call if you have questions.
Hard copy to follow by mail.



PACIFIC
ENVIRONMENTAL
GROUP, INC.

AN  COMPANY

ENVIRONMENTAL
PROTECTION

MAR 26 AM 9:27

March 23, 1999
Project 360-014.2B

Mr. Dennis Buran
Glascok Street Properties
425 Market Street
Oakland, California 94607

Re: Alameda County Health Care Services Agency letter dated February 25, 1999
Former Dorr-Oliver Site
2901 Glascok Street, Oakland, California

Dear Mr. Buran:

Pacific Environmental Group, Inc. (PEG) has prepared this letter in response to the above-referenced letter from Mr. Barney Chan of the Alameda County Health Care Services Agency (ACHCSA). In his letter, Mr. Chan indicated that the ACHCSA approves of the remedial plan proposed in the *Work Plan for Additional Remediation* (PEG, January 25, 1999), but he requested an explanation of why the amount of ORC proposed in PEG's work plan was appropriate. The following paragraphs respond to that request.

PEG's *Work Plan* was aimed at treating residual elevated concentrations of dissolved unknown hydrocarbons within the diesel range in three specific target areas at the site: 1) the former underground storage tank (UST) site in the northeast corner of the building; 2) an area south/southwest of Well MW-1, and; 3) an area about midway between former Well MW-5 and Well MW-6. The goal of the remedial program was not to remediate the entire site, but rather to stimulate bioremediation in three areas exhibiting concentrations of unknown hydrocarbons in the diesel range exceeding the ACHCA-recommended goal of 314 micrograms per liter ($\mu\text{g/L}$) for diesel.

To develop an estimate of the amount of Oxygen Releasing Compound (ORC®) to use for each of these three areas, PEG utilized the Regenesi Bioremediation Products *ORC® Applications Software, Version 2.0*. PEG used an average hydrocarbon concentration of 2,800 $\mu\text{g/L}$, an average treatment area width of 40 feet with 5 delivery

5x
4.4

22.0RC #

points, an average groundwater velocity of 0.1 feet per day, a treatment zone thickness of 10 feet, and an average porosity of 0.3.

The initial results from the *Applications Software* indicated a loading of 4.4 pounds ORC® per delivery point would be sufficient, given the above assumptions and a safety factor of 2 (the safety factor recommended by Regenesis). However, the use of such a low dosage of ORC® would result in an application below Regenesis' recommended minimum of 1.0 pound ORC® per linear foot of treatment zone. (4.4/5 = 0.88)

Therefore, PEG increased the safety factor by 5, and ran a second iteration of the *Applications Software* using the same initial parameters and a safety factor of 7. The resulting output again demonstrated sufficient ORC® would be delivered, but this time at a rate of 1.62 pounds per linear foot of treatment zone (above than the lower limit of 1.0 recommended by Regenesis). A table summarizing the results of this iteration of the *Applications Software* is attached.

While the use of a safety factor of 7 significantly increased the dosage of ORC® applied at each delivery point, it still allows a slurry with only 30% solids to be prepared for each delivery point using 4-1/2 to 5 gallons of water – a mixture which should be readily deliverable via direct-push boring technology.

PEG expects the above explanation should satisfy Mr. Chan's request. Please feel free to contact me at (408) 441-7500 should you have any questions or comments regarding this letter.

Sincerely,

Pacific Environmental Group, Inc.



Andrew Lehane
Project Engineer
RCE 55798

Attachments: ORC Remediation Worksheet

cc: Mr. Barney Chan, ACHCSA

BTEX for gas

ORC SLURRY INJECTION BARRIER

(release 6 mos.)

Dissolved Hydrocarbon Level (ppm)	2.8
Plume Width (ft)	40
Plume Velocity (ft/day)	0.1
Thickness of contamination in Saturated Zone (ft)	10
Thickness of ORC slurry in Saturated Zone (ft)	10
Porosity	0.3
Safety Factor for Injection Barriers (recommended Safety Factor = 2)	7

Hydrocarbon Load per Day (lbs)	0.015
Oxygen Demand Per Day (lbs)	0.045
Oxygen Required (Lbs)	8.1
ORC Required (lbs)	81
Desired number of points	5
ORC per Hole (lbs)	16.2
ORC per foot (lbs)	1.62
Minimum Spacing (ft)	8.0
Solids Content (%)	30%
Water per Hole for Slurry (gal)	4.53

<i>x30</i>	0.015	<i>.0021 x 7</i>
	0.045	<i>6 mo release period</i>
	8.1	
<i>10%</i>	81	
	5	
	16.2	<i>10 ft hole</i>
	1.62	
	8.0	
	30%	<i>6.2 x .3</i>
	4.53	

Application Comments

* ORC per hole is above lower limit of 1 pound per linear foot.

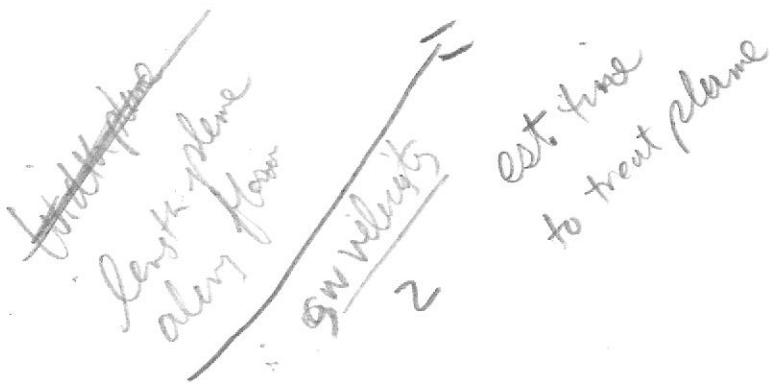
** Barrier Design should potentially handle constant mass flux requirements.

width *porosity* *thickness* *g/mg* *g/#*

$$(40)(.3)(10)(28.3) \times 10^{-3} \times \frac{1}{454} = .0021\#$$

$$\approx \frac{x}{1.3} = 180$$

$$x = 54$$



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



February 25, 1999
StID # 1138

Mr. Dennis Buran
Glascock Street Properties
425 Market St.
Oakland CA 94607

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

Re: Work Plan for Additional Remediation at Former Dorr-Oliver Site, 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Buran:

Our office has received and reviewed the January 25, 1999 Pacific Environmental Group, Inc. (PEG) Work Plan for remediation at the above referenced site. The work plan proposes the installation of borings in three distinct areas on the site and the injection of oxygen releasing compound (ORC). The borings will be advanced to a depth of 20 feet and backfilled from the bottom of the boring to a depth of 10'. The remainder of the boring would be grouted with cement. A total of 15 borings with 16 pounds of ORC per boring is proposed.

I have used the reported Third Quarter 1998 concentrations of diesel in groundwater at this site to estimate the approximate amount of ORC needed to treat the petroleum plume. Using the following conservative assumptions:

- Approximate plume size is 80'x240'x10'
- Average diesel concentration is 2.8 mg/l
- The recommended additional demand factor (8), Oxygen:Hydrocarbon ratio (3) and assumed ORC concentration of 10% oxygen

The estimated amount of ORC needed to treat this amount of hydrocarbon is 2800# as opposed to the proposed $15 \times 16 = 240\#$. Therefore, it appears that the proposed amount of ORC is about 1/10 the amount necessary.

Although our office approves of the concept of adding ORC into the saturated soils to treat the diesel contamination, we would like you to explain why the proposed amount of ORC is appropriate. Please have your consultant respond to this inquiry prior to scheduling this work.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

✓ C: B. Chan, files
Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose, CA 95110-1006

ORCwp2901

438

E. B. FIELD COMPANY

SINCE 1921
REAL ESTATE

TELEPHONE (510) 444-1391
FAX (510) 444-1394
436 FOURTEENTH STREET, SUITE 305
OAKLAND, CALIFORNIA 94612

February 12, 1999

ENVIRONMENTAL
PROTECTION
99 FEB 16 PM 4: 51

Mr. Barney M. Chan, Haz. Mat. Specialist
ALAMEDA COUNTY HEALTH CARE SERVICES
Environmental Protection
1131 Harbor Bay Parkway
Alameda, California 94502-6577

Re: Work Plan for 2901 Glascock Avenue, Oakland, CA

Dear Barney:

(dated 3/25/99?)

BP Petroleum, Dennis Buran and I approve of the Work Plan that Pacific Environmental Group has prepared. We would like to have them proceed as soon as possible.

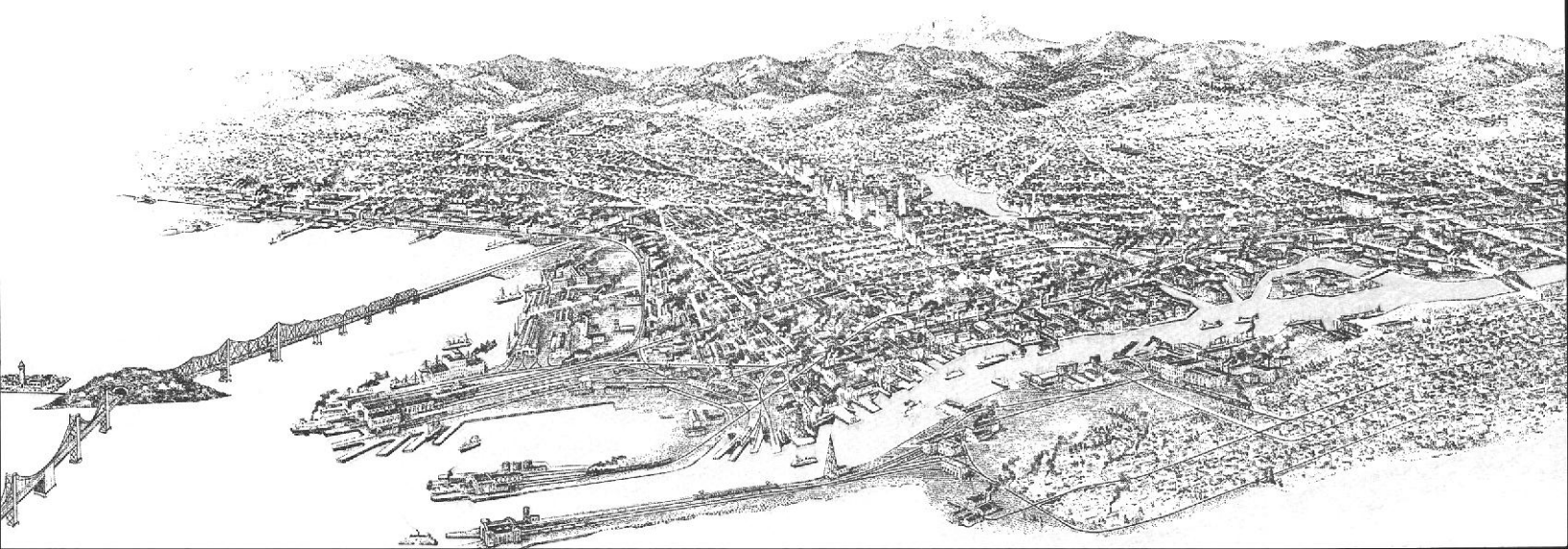
We are a little concerned about the possible contamination from a Mercedes auto rebuilding facility at 416 Peterson Street across from the subject property. Possibly this MtPBE may be coming from their site, although I don't know.

If there is anything else you have to do to get this started, please let me know.

Sincerely yours,

R C Croop
R. C. Croop

RCC:lap





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

January 8, 1999
StID # 1138

Mr. Dennis Buran
Glascock Street Properties
425 Market St.
Oakland CA 94607

**Re: Third Quarter 1998-Quarterly Report for Former Dorr-Oliver Site, 2901 Glascock Ave.,
Oakland CA 94601**

Dear Mr. Buran:

Our office has received and reviewed the November 23, 1998 Third Quarter 1998 report for the above site as prepared by Pacific Environmental Group (PEG), your consultant. In this report, a number of variations were used to analyze the petroleum hydrocarbon in the groundwater samples. Groundwater samples were analyzed after treating with silica gel and another analyzed after filtering through a 0.7 micron filter and treatment with silica gel. These procedures may be more representative of the groundwater by removing sediment and polar non-petroleum materials. Further, the laboratory characterized the hydrocarbon as resembling the fresh product, the weathered product or as unidentifiable material in a particular carbon range.

Because the laboratory could not identify the hydrocarbon as either diesel, motor oil or weathered diesel or motor oil, your consultant concludes that these products do not exist and no further action is required. Our office, with concurrence with the Water Board, does not agree with this conclusion. We agree that the treatment methods are valid and may yield a truer value for the petroleum concentration. However, the material which is identified in a particular carbon range still represents material which may have equal or higher risk than the fresh or weathered product. Most certainly, this material came from the original material. Because an extensive study has not been done to determine the toxicity of the fresh product, weathered product or product within the diesel range, all material is considered equally toxic.

As a starting point, the recommended clean-up levels in the San Francisco Airport Order 95-136 were considered. TPH as diesel clean-up levels for soil and groundwater were recommended for the zone within 300 feet of the water. These levels under consideration are 0.314 mg/l for groundwater and 267 ppm for soil. These clean-up levels continue to be exceeded at this site.

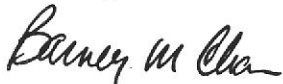
The characterization of the petroleum does not alter the data which still indicates residual fuel in the saturated soils near the former tanks. Because of this, you are required to complete the previously requested items in my September 29, 1998 letter. Further, the work plan when approved, should be implemented as soon as possible.

Please submit your work plan including the requested information to our office **within 30 days or by February 10, 1999.**

Mr. R. Croop
StID # 1138
2901 Glascock Ave., Oakland 94601
January 8, 1999
Page 2.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose, CA 95110
Mr. C. Headlee, RWQCB, 1515 Clay St., Suite 1400, Oakland CA 94612

2ORCwp-2901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



~~September 29, 1998~~

StID # 1138

Mr. R.C. Croop
E.B. Field Company
426 Fourteenth St., Suite 305
Oakland CA 94612

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

Re: Work Plan for 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Croop:

Our office has received and reviewed the September 11, 1998 Quarterly Report for groundwater monitoring at the above referenced site as prepared by Pacific Environmental Group, Inc., (PEG). This report also responded to my prior August 18, 1998 letter, wherein I requested a work plan for the remediation of the petroleum plume at this site.

Based on the results of this monitoring event, dissolved diesel (aged diesel) and motor oil still exists at the site in areas near the former underground tanks and near the boundary of the site and the Oakland-Alameda estuary.

This report proposes to perform the same work previously proposed in PRG's November 12, 1997 work plan. This is the installation of the five remediation wells just up-gradient of monitoring well MW-6 and the estuary. I must reiterate, this work plan alone is **not acceptable** to our office and that of the Water Board. As stated in my August letter, additional oxygen releasing compound (ORC) must also be applied to the source areas at the site ie near or down-gradient of the former underground storage tanks. In addition, our offices feel it is of value to determine the mass of petroleum hydrocarbon at the site even though your consultant feels that there is inherent error in making this estimation. I believe that a conservative estimate can be made for the amount of petroleum mass and the amount of ORC added accordingly.

Your work plan should include the following:

- an estimation of the amount of ORC needed to treat the petroleum mass
- a justification for the location of the wells and borings
- the construction specifications for the wells and borings and
- a method for evaluating the effectiveness of the ORC application.

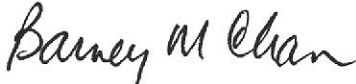
Your consultant also implies that because there are no concrete cleanup levels recommended for this site the previously suggested values may be too conservative. This may be the case, however, the current petroleum concentration in groundwater exceeds even the most liberal concentrations anticipated as future cleanup goals. We would also argue that the qualitative objectives **have not been met**. The hydrocarbon plume is not stabilized or shrinking, considerable dissolved source remains on-site and the ecological risk may exist to the estuary population.

Please provide a complete work plan for the introduction of ORC to groundwater at this site **within 30 days or by October 30, 1998**

Mr. R. Croop
StID # 1138
2901 Glascock Ave.
September 29, 1998
Page 2.

Please contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose, CA 95110

Mr. C. Headlee, RWQCB, 1515 Clay St., Suite 1400, Oakland CA 94612

ORCwp-2901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

August 18, 1998
StID # 1138

Mr. R. C. Croop
E.B. Field Company
436 Fourteenth St., Suite 305
Oakland CA 94612

**Re: Request for Work Plan for Groundwater Treatment at 2901 Glascock Ave., Oakland
CA 94601**

Dear Mr. Croop:

In my July 9, 1998 letter to you, I requested a work plan to remediate the petroleum hydrocarbon, consisting of mainly diesel and motor oil, in the groundwater at the above site. This followed our May 14, 1998 meeting at the Water Board with Mr. Chuck Headlee. At that time, Mr. Headlee clearly stated that the current levels of dissolved diesel at this site were not acceptable to be discharged into the estuary. A generalized cleanup level of 570 parts per billion (ppb) was provided as an initial goal based on an average of data from various locations in the Bay Area. Lower values, have also been proposed as low as 100 ppb. Our office acknowledges that it is not practical to perform any more soil excavation, therefore, groundwater treatment will be required.

I spoke with you on August 7, 1998 and you stated that you had decided to perform enhanced bioremediation using oxygen releasing compound injection. My letter requested that you submit your work plan by August 10, 1998. To date, our office has not received your work plan.

In addition, please be advised, that the November 12, 1997 Pacific Environmental Group (PEG) work plan by itself is not acceptable. That work plan proposed to install five remediation wells (RW-1 through RW-5) immediately up-gradient to MW-6 and each well would be equipped with an ORC device. Though this might form "curtain" of oxygen enriched groundwater, it would not treat the source of the release which lies considerably up-gradient of MW-6 near the former underground tanks.

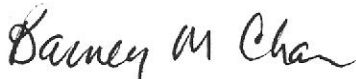
In your work plan, please have your consultant provide a justification for the number and location of borings needed to introduce the oxygen releasing compound (ORC). This can be done by estimating the amount of residual petroleum at the site and calculating the amount of oxygen needed to react with this amount of hydrocarbon. It is anticipated that a grid of borings for slurry ORC injection will be necessary to achieve this effect.

**Please submit your work plan and a schedule for its implementation within 30 days or by
September 21, 1998.**

Mr. R. Croop
StID # 1138
2901 Glascock Ave.
August 18, 1998
Page 2.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. Lehane, Pacific Environmental Group, 2025 Gateway Place, Suite 440, San Jose,
CA, 95110

Mr. C. Headlee, RWQCB

2wp2901

E. B. FIELD COMPANY

SINCE 1921
REAL ESTATE

TELEPHONE (510) 444-1391
FAX (510) 444-1394
436 FOURTEENTH STREET, SUITE 305
OAKLAND, CALIFORNIA 94612

August 14, 1998

#1138

Mr. Barney Chan
Hazardous Materials Specialist
ALAMEDA COUNTY HEALTH CARE SERVICES
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Re: 2901 Glascock Avenue, Oakland CA 94601

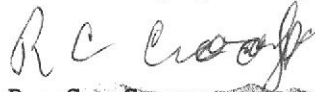
Dear Mr. Chan:

I have contacted the other seven owners of the Glascock Street property and we agree that the enhanced bioremediation with use of an oxygen compound is our best alternative for several reasons.

We have leased the property with an option to buy at a very low price in order to dispose of this facility. Most of the owners made loans with funds from their retirement plans and are reluctant to put a lot of extra money into this facility. There is some question about the foundation problems with options #3B or #4, plus the additional cost. The first option will also inconvenience the tenant less than some of the other programs.

I am sending a copy of this letter to Mr. Andrew Lehane, Project Engineer, PACIFIC ENVIRONMENTAL GROUP, INC., and he will furnish you with a work-plan shortly.

Sincerely yours,



R. C. Groop
RCC:lap
cc: A. Lehane
Enclosure

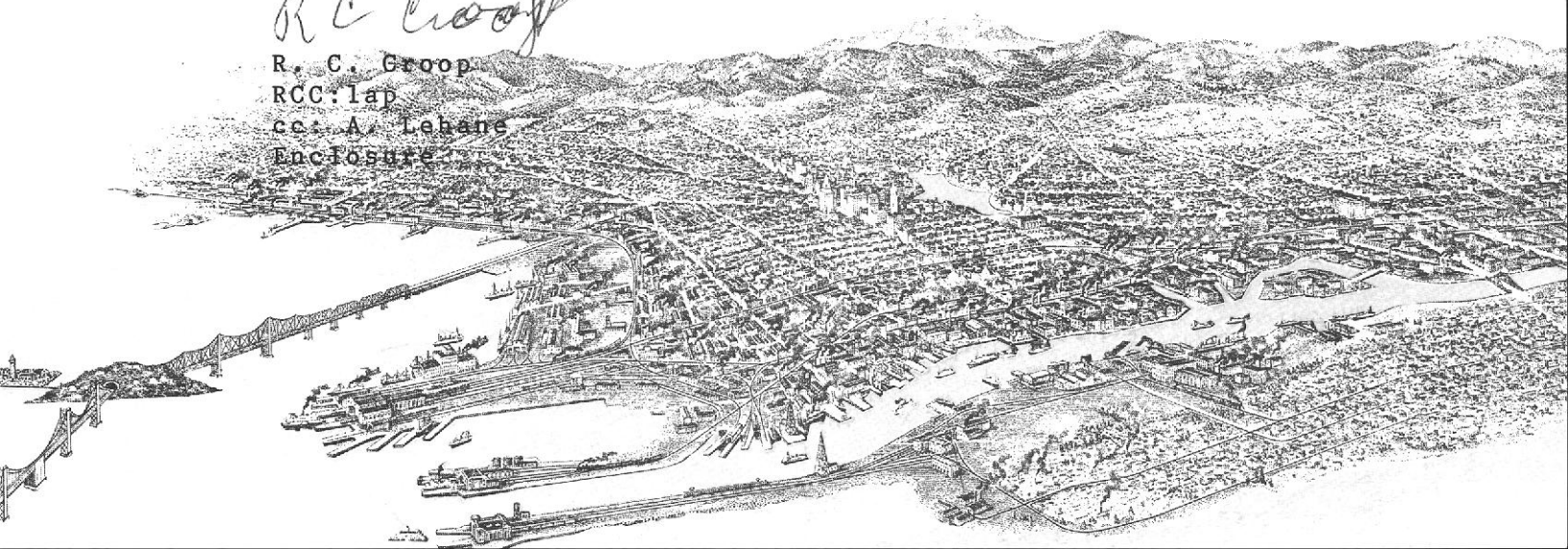


Table 1
Comparison of Remedial Alternatives
2901 Glascock Street, Oakland, CA

8/5/98

Remedial Alternative	Estimated Installation Cost (ROM \$)	Estimated Project Duration (years)	Estimated O&M (\$/year)
1) Enhanced Bioremediation with ORCs	10,000	3	5,000
2) Air Sparging w/ Vapor Abatement	50,000 add 15,000	2 1 to 2	15,000 add 5,000
3a) Groundwater Extraction from Wells with Treatment	80,000	2	20,000
3b) Groundwater Extraction from Trench with Treatment	120,000 - 150,000	2	30,000
4) Barrier System	200,000 - 300,000	0.5/5*	--

Notes:

- 1) All costs shown are estimated based on scope of work presented in memo and cost data for similar projects.
- 2) Quarterly groundwater monitoring and reporting is not included in above estimate, but would be required for all alternatives until site closure is achieved.
- 3) Estimated duration for design, permitting and installation is 0.5 year; estimated duration for ongoing groundwater monitoring is 5 years.



PACIFIC
ENVIRONMENTAL
GROUP, INC.

AN  COMPANY

Date: July 21, 1998
Project: 360-014.2B

#1138

To: Mr. Barney Chan
Alameda County Health Care
Services Agency
1131 Harbor Bay Parkway
Alameda, CA 94502

ENVIRONMENTAL
PROTECTION
98 JUL 22 PM 5:30

We have enclosed:

Copies	Description
<u>1</u>	<u>Quarterly Report- First Quarter 1998</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

For your: Use
 Approval
 Review
 Information

Comments: Included is a copy of the First Quarter 1998 report for your review. Please call our office at (408) 441-7500 if you have any questions. Thank you.

Erik Noolandi

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

July 9, 1998
StID # 1138

Mr. R.C. Croop
E.B. Field Company
436 Fourteenth St., Suite 305
Oakland CA 94612

Re: 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Croop:

This letter responds to your July 7, 1998 letter requesting an update on the status of the above site in regards to achieving site closure. First of all, please be aware that letter which you sent to our office from Ms. Madhulla Logan granting closure dealt with the removal of metal shavings and slag material from the shoreline of the site. That was a completely separate issue from the on-going petroleum release from the former underground diesel tanks.

In regards to the meeting we had at the Water Board on May 14, 1998, it was concluded that the diesel contamination currently found in groundwater at this site exceeds acceptable levels which would be protective of the ecological species in the estuary. Mr. Chuck Headlee of the Regional Water Quality Control Board (RWQCB) provided a draft table of acute toxicity concentrations for a selective number of petroleum hydrocarbons relative to their effects on development and survival of specific aquatic species. This was meant to act as guidance for determining acceptable residual groundwater concentrations at ecological risk sites. Mr. Headlee further stated that chronic ie long term exposure, concentrations of petroleum hydrocarbons should be 1/10 the value of the acute concentrations. Because many acute values are given in this draft, I averaged the 12 values given for diesel and diesel/fuel oil. The resultant concentration is approximately 5700 ug/l (parts per billion). The acceptable chronic concentration would therefore be 5700/10 or 570 ppb diesel. The RWQCB is also considering Tier 1 Standards for LUFT Sites Adjacent to Surface Waters. In this draft, both saltwater and freshwater ecological maximum soil and groundwater concentrations are proposed. The corresponding saltwater diesel maximum groundwater ^{concentration} sample is 100 ppb.

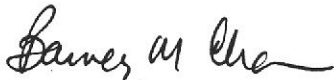
The groundwater sampling results for the March 27, 1998 event indicate that the concentration of diesel in monitoring well MW-6 has declined to 1500 ppb, while the concentrations in monitoring wells MW-1 and MW-2 have increased to 4600 ppb and 15,000 ppb, respectively. This indicates that the dissolved diesel contamination source remains onsite and continues to pose a threat to the estuary. Prior to recommending site closure, it must be demonstrated that the groundwater plume is shrinking or stabilized. The contamination source should be removed or remediated. In addition, no risk to human health or the environment should exist (ie the cleanup levels must be met). At this time, our office requests a work plan to achieve the requirements mentioned above.

Mr. Croop
StID # 1138
2901 Glascock Ave.
July 9, 1998
Page 2.

Please provide your work plan **within 30 days or by August 10, 1998**. Please also provide a copy of the complete monitoring report performed on March 27, 1998. I would appreciate if you provide a copy of this letter to all other interested property owners.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B.Chan, files

Mr. A. Lehane, Pacific Environmental Group, 2025 Gateway Place, Suite 440, San Jose,
CA 95110

Mr. C. Headlee, RWQCB .

Stat2901

E. B. FIELD COMPANY

SINCE 1921
REAL ESTATE

TELEPHONE (510) 444-1391
FAX (510) 444-1394
436 FOURTEENTH STREET, SUITE 305
OAKLAND, CALIFORNIA 94612

ENVIRONMENTAL
PROTECTION

98 JUL -8 PM 2:13

July 7, 1998

Mr. Barney Chan
ALAMEDA COUNTY HEALTH CARE SERVICES
1131 Harbor Bay
Alameda, California 94502

Re: 2901 Glascock Avenue, Oakland, CA
Dear Mr. Chan:

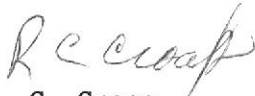
I have been unable to reach you by phone for the past two or three weeks and I would like to know what has happened since our meeting over a month ago at the California Water Board office.

I understand they are agreeable to some type of a limited closure that would permit the use of the property for industrial or commercial services but not permit things such as live-work studios, day care centers and things of that type.

I have enclosed a letter from someone else in your office written three years ago and you will note that the last couple of paragraphs state that considerable work has been done and that no further action is required.

Could you please give me a call or give us a letter at your earliest convenience.

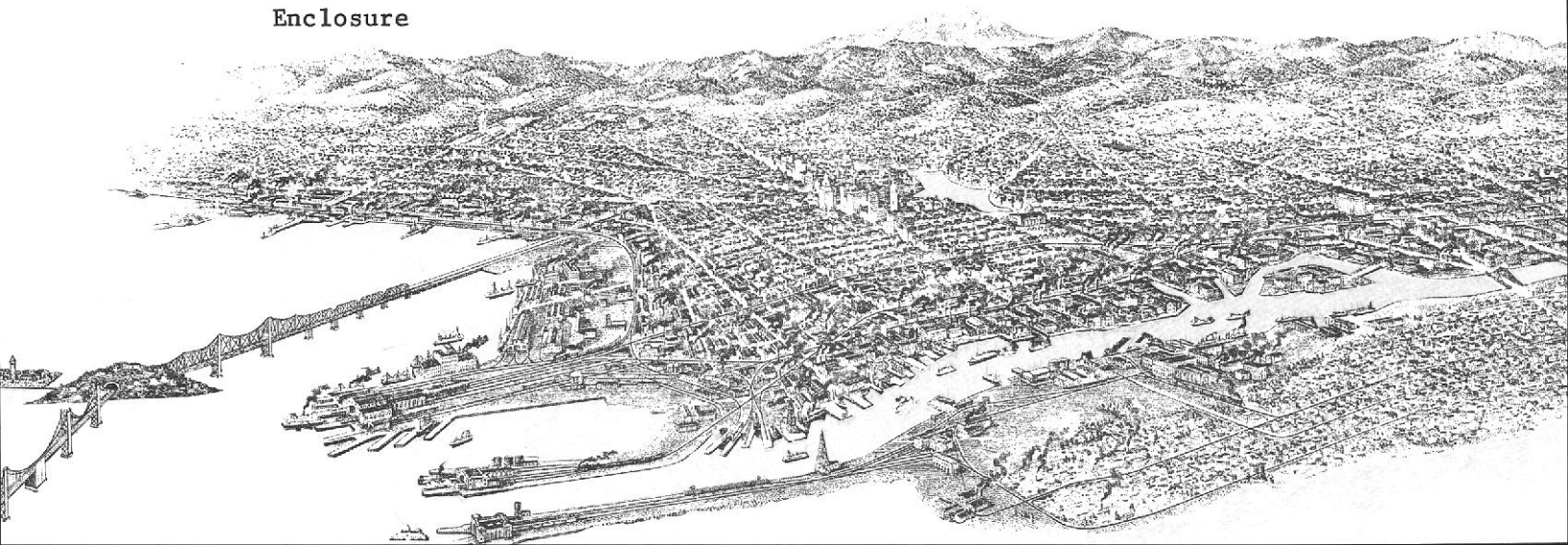
Sincerely yours,



R. C. Croop

RCC:lap

Enclosure



ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

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

November 21, 1997
StID # 1138

Mr. Dennis Buran
Glascock St. Properties
425 Market St.
Oakland CA 94607

**Re: Work Plan for Additional Remediation for 2901 Glascock St.,
Oakland CA 94601**

Dear Mr. Buran:

Our office has received and reviewed the November 12, 1997 Remediation Work Plan provided by Pacific Environmental Group, Inc., (PEG). This work plan responds to my prior letter requesting additional actions to remediate the high levels of Total Petroleum Hydrocarbons as diesel (TPHD) occurring at this site and being discharged into the Oakland-Alameda estuary.

This work plan proposes the installation of five (5) remediation wells, (RW), where oxygen releasing compound (ORC) will be added. This array of wells proposed should serve as a "curtain" to prevent the migration of petroleum contamination into the estuary. Our office approves of this work plan with the condition that if concentrations of TPHd do not attenuate and stabilize in monitoring wells MW-1 and MW-2, additional RWS may be necessary to treat the heart of the plume. Please schedule this work as soon as possible.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose
CA, 95110

RWS2901

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Post-It™ brand fax transmittal memo 7671		# of pages ▶ 2
To B. Lehane	From B. Chan	
Co. PEG	Co. ACEH	
Dept.	Phone # 408-441-7539	
Fax #	Fax #	

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

October 10, 1997
StID # 1138

Mr. Dennis Buran
Glascocock Street Properties
425 Market St.
Oakland CA 94607

Re: Quarterly Report-Second Quarter 1997, 2901 Glascocock St.,
Oakland CA 94601

Dear Mr. Buran:

Our office has received and reviewed the August 19, 1997 Pacific Environmental Group (PEG) quarterly groundwater monitoring report for the above referenced site. I have also spoken with Mr. Andrew Lehane of PEG. He requested that I comment on the recommendations made in this report. Recall, PEG has used a number of sources and come up with a proposed cleanup standard of 6.5 ppm (mg/l) Total Petroleum Hydrocarbons as diesel (TPHD) for this site. Based upon the monitoring results, PEG recommended that no modification of the remediation plan be performed. That is, remediation would consist solely of the addition of Oxygen Releasing Compound (ORC) in wells MW-1, MW-2 and MW-6.

I spoke with Mr. John Kaiser of the SFRWQCB about this site. It was his opinion that current conditions at this site were not acceptable. Through our discussion the following observations were made:

- * the immediate proximity of the Oakland-Alameda estuary to this site indicates that the petroleum release from this site is within the mixing zone of the estuary water and is therefore directly discharging into the surface water.

- * as mentioned in the PEG report, the RWQCB does not consider dilution when setting discharge limits from the surface

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Post-It™ brand fax transmittal memo 7671 # of pages ▶ 2	
To A. Lehane	From B Chan
Co. PEG	Co. ACEH
Dept.	Phone # 408-441-7539
Fax #	Fax #

October 10, 1997
StID # 1138

Mr. Dennis Buran
GlascocK Street Properties
425 Market St.
Oakland CA 94607

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

**Re: Quarterly Report-Second Quarter 1997, 2901 GlascocK St.,
Oakland CA 94601**

Dear Mr. Buran:

Our office has received and reviewed the August 19, 1997 Pacific Environmental Group (PEG) quarterly groundwater monitoring report for the above referenced site. I have also spoken with Mr. Andrew Lehane of PEG. He requested that I comment on the recommendations made in this report. Recall, PEG has used a number of sources and come up with a proposed cleanup standard of 6.5 ppm (mg/l) Total Petroleum Hydrocarbons as diesel (TPHD) for this site. Based upon the monitoring results, PEG recommended that no modification of the remediation plan be performed. That is, remediation would consist solely of the addition of Oxygen Releasing Compound (ORC) in wells MW-1, MW-2 and MW-6.

I spoke with Mr. John Kaiser of the SFRWQCB about this site. It was his opinion that current conditions at this site **were not acceptable**. Through our discussion the following observations were made:

* the immediate proximity of the Oakland-Alameda estuary to this site indicates that the petroleum release from this site is within the mixing zone of the estuary water and is therefore directly discharging into the surface water.

* as mentioned in the PEG report, the RWQCB does not consider dilution when setting discharge limits from the source, therefore, dilution factors cannot be considered.

* the referenced 10 mg/l water protection standard for oil and grease in the Basin Plan cannot be used TPHd. It is known that the ecotoxicity of TPHg, TPHd, TPHmo vary.

* though the RWQCB may be considering modifying the groundwater cleanup standards for the SF Airport, it has not been shown that the conditions and assumptions made for the Airport, which would allow this modification, also exist at this site.

Mr. Dennis Buran
StID # 1138
2901 Glascock Ave.
October 10, 1997
Page 2.

* the measured oxygen concentration in those wells where ORC was added is 3-4 ppm, considerably lower than saturated conditions. It appears that site could benefit by the addition of more ORC compound since the areal extent of the current ORC compound is not treating the entire extent of groundwater contamination.

* besides TPHd, these analytes have been detected in MW-6, the most downgradient well; TPHg, benzene, MTBE, TPH as motor oil and chlorinated solvents. Are there cleanup levels necessary for any of these parameters?

* the "conservative" cleanup level of 3 mg/l TPHd from the Aquatic Toxicity of Petroleum Product (ATPP) and the proposed cleanup level of 6.5 mg/l has been exceeded regularly in MW-6.

Because of the above, our office requests that a further modification of your remedial plan be instituted. Please provide an appropriate work plan to our office **within 30 days or by November 12, 1997.**

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files

Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose
CA, 95110

Mr. J. Kaiser, RWQCB

modwp2901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION (LOP)

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700

FAX (510) 337-9335

July 17, 1997

StID # 1138

Mr. Dennis Buran
Glascock St. Properties
425 Market St.
Oakland CA 94607

**Re: Subsurface Investigation at 2910 Glascock Ave., Oakland CA
94601**

Dear Mr. Buran:

Our office has received and reviewed the May 2, 1997 Pacific Environmental report which includes the first quarter 1997 Groundwater Monitoring report and the February 19, 1997 Remedial Soil Excavation Report. The results of the excavation report indicates that the contaminated shallow soils have been successfully removed. The results of the monitoring report indicate a continuing petroleum hydrocarbon plume beneath the southern portion of the site. Of continuing concern is the elevated Total Petroleum Hydrocarbons as diesel (TPHd) and Total Petroleum Hydrocarbons as motor oil (TPHmo) which is likely migrating offsite into the Oakland Estuary.

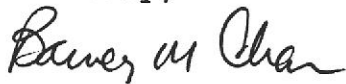
The quarterly report states that oxygen-releasing compound (ORC) will be introduced into monitoring wells MW-1, MW-2 and MW-6 during the second quarter 1997 and dissolve oxygen measured before and after introduction. Our office requests that an additional grid of casings be introduced in the southern section of the site to serve as a curtain to reduce or prevent the continual discharge of TPH into the Oakland Estuary. You can get a proposal for performing this from your consultant or the provider of the ORC. When this curtain is installed, you should remove all ORC from monitoring well MW-6 which will then serve as an indicator well to verify intrinsic bioremediation. Please provide a work plan for this or another remediation method (ie bioslurping et al) **within 30 days or by August 18, 1997**. You are also encouraged to provide suggested cleanup levels for TPH protective of estuarine life.

It was noted that you failed to run the metals cadmium, chromium, lead, nickel and zinc and halogenated volatile organics on well MW-6 and MW-8 as requested in my September 30, 1997 letter. Please add these parameters on your future monitoring.

Mr. Dennis Buran
StID # 1138
2901 Glascock Ave.
July 17, 1997
Page 2.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: Mr. A. Lehane, Pacific Environmental Group, 2025 Gateway
Place, Suite 440, San Jose, CA 95110
B. Chan, files

wprq2901



SOL MAR
425 Market Street
Oakland, California 94607
(510) 836-6100

112,80
94

206
ENVIRONMENTAL
PROTECTION
97 JUN 23 PM 4: 03

June 20, 1997

#1138

Mr. Barney M. Chan
Hazardous Materials Specialist
ALAMEDA COUNTY HEALTH CARE SERVICES
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Dear Mr. Chan:

Enclosed are the results of soil remediation activities as assessed by Pacific Environmental Group @ February 19, 1997, and @ May 2, 1997, together with 1st quarter 1997 monitoring well results.

The enclosures also indicate our current remediation activities.

As always, if you have any comments or questions, please do not hesitate to call.

Sincerely,

Dennis F. Buran
Partner

cc: Richard Croop
Jim Muir

E. B. FIELD COMPANY

SINCE 1921
REAL ESTATE

TELEPHONE (510) 444-1391
FAX (510) 444-1394
436 FOURTEENTH STREET, SUITE 305
OAKLAND, CALIFORNIA 94612

ENVIRONMENTAL
PROTECTION
97 FEB 13 AM 9:36

February 10, 1997

1138

Mr. Barney Chan
Hazardous Materials Specialist
Alameda County / Environmental Health
1131 Harbor Bay Parkway, #250
Alameda, California 94502-6577

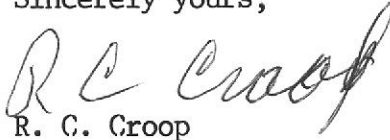
Dear Mr. Chan:

Enclosed is a report from the Pacific Environmental Group for recent work that has been done at 2901 Glascock Street.

They have removed PCB's from the yard area and pretty well wound up the testing work that they feel was required. I thought you should have a copy of it.

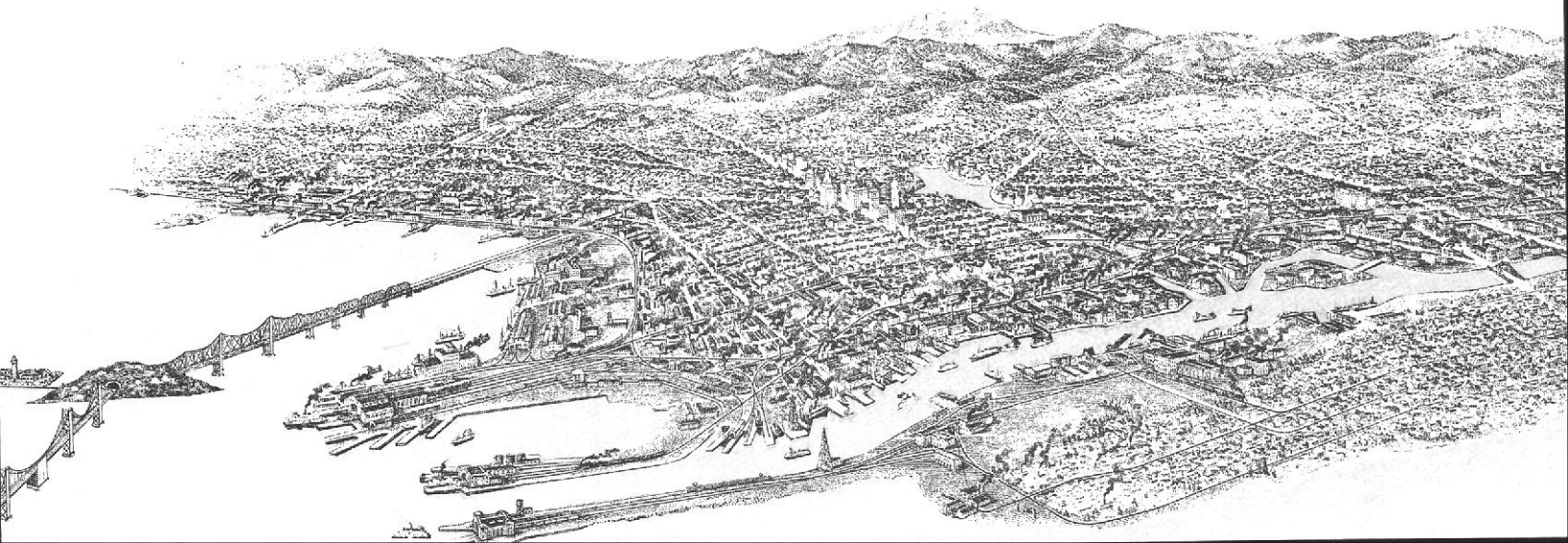
Please call us if there is anything you can suggest that would help us get a closure on this property at an early date.

Sincerely yours,


R. C. Groop

RCC:lap

Enclosure



ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

September 30, 1996

StID # 1138

Mr. Dennis Buran
Glascock St. Properties
425 Market St.
Oakland CA 94607

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

Re: Remedial Activities at 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Buran:

This letter serves to comment on the suggestions made in Pacific Environmental Group's (PEG) September 10, 1996 quarterly monitoring report along with specifying conditions for the previously proposed Remedial Action Recommendation in PEG's February 29, 1996 report.

Based on recent groundwater sampling data which shows reduced concentration of diesel contamination in monitoring wells, PEG no longer recommends bioslurping from the wells. PEG recommends the installation of oxygen releasing compound (ORC) units in MW-1, MW-2, MW-3, MW-5 and MW-6. At this time, our office agrees with this approach, however, should the trend of decreasing diesel concentration not continue, bioslurping and/or additional ORC well points should be considered.

Please discuss the merits of groundwater sampling from the wells in which ORC units are implaced. Our office questions the validity of groundwater sampling from wells "within" the treatment area. Does groundwater sampling really reflect the concentration of the plume or just an area of increased biodegradation?

I understand that the limited excavation of hydrocarbon and PCB affected soils is currently being scheduled. In order to determine the effectiveness of this excavation, please take confirmatory soil samples from sidewalls and floor of the excavation. TPH as diesel and TPH as motor oil should be run on the samples from the hydrocarbon contaminated area and EPA Method 8080 should be run on the confirmatory samples from the PCB affected area. Compositing sampling may be done, however, please be aware of the limitation that this type result gives. Field screening as well as visual observation is recommended when determining the extent of excavation.

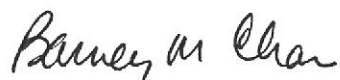
You are reminded to continue to analyze all wells for TPHd,g,mo and BTEX on a quarterly basis and on an annual basis please analyze wells MW-6 and MW-8 additionally for the metals: cadmium, chromium, lead, nickel and zinc and chlorinated hydrocarbons.

Mr. Dennis Buran
StID # 1138
2901 Glascock Ave.
September 30, 1996
Page 2.

Please notify me prior to your field work so I may arrange to be present if possible to witness confirmatory sampling.

I may be reached at (510) 567-6765 if you have any comments or questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose,
CA 95110

B. Chan, files

RA2901

O.A.R. CMLS METRO



OAKLAND INDUSTRIAL COMPLEX FOR SALE - NEW PRICE!!!

LOCATION: 2901 Glascock Street near 29th Avenue--Park Street Bridge to Alameda.

LAND AREA: Approximately 84,000 square feet.

BUILDING AREA: 71,900 square feet of frame and steel construction with various crane-ways ranging from 3 to 10-ton capacity. See sketch on reverse side.

HOW SHOWN: Contact listing broker. Please do not go direct, as premises are occupied.

AVAILABILITY: 60 days.

\$1,295,000 all cash

PRICE: ~~\$1,750,000 all cash.~~

COMMENTS: This building backs up to the Oakland Estuary and is zoned M40. The structure could be subdivided for a variety of industrial tenants and plans for a possible renovation project for live/work studios are available.

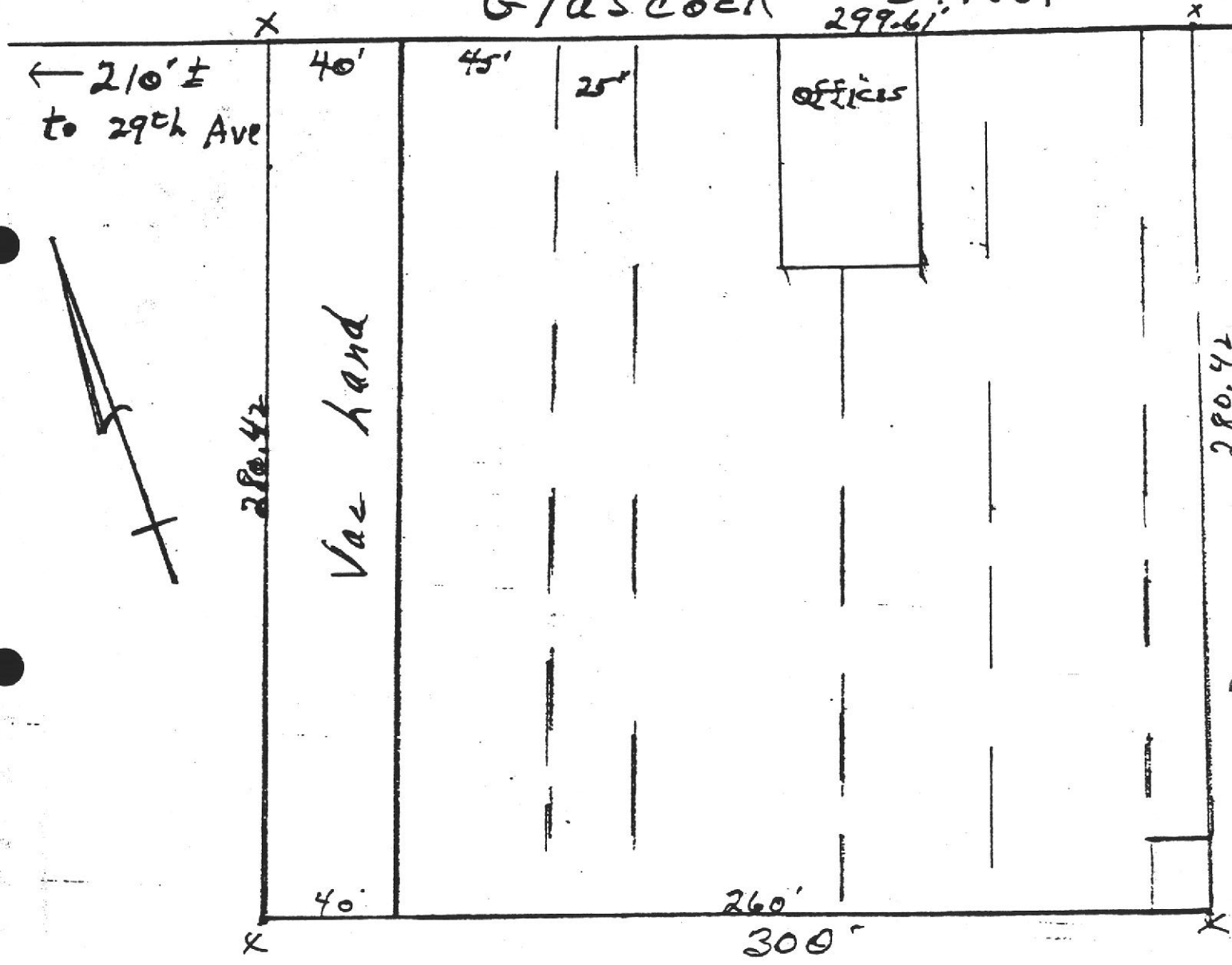
All present tenancies are month-to-month and owner would lease all or partially at 15¢ per square foot.

CITY:	Oakland	LISTING CO.:	E. B. Field Company
ADDRESS:	2901 Glascock St.	LISTING AGT.:	R. C. Croop
CROSS ST.:	29th Ave. & Peterson	PHONE #:	444-1391
SPACE AVAIL:	Bldg. 71,900 sq. ft.	LIST DATES:	4/23/92 - 7/23/92
PRICE:	\$1,295,000 all cash	LISTING #:	M0698-92
PROP. TYPE:	Industrial	FEE TO S.O.:	1/2 of 5%

25-675 (2-1)
674 (1)

#2901

Glascok Street 299-61'



EB Field Co
Scale 1" = 50'

Parcel # 2 in
EB Field map.

Bldg Area
~ 1067
sq. ft. 71,900 ± ±

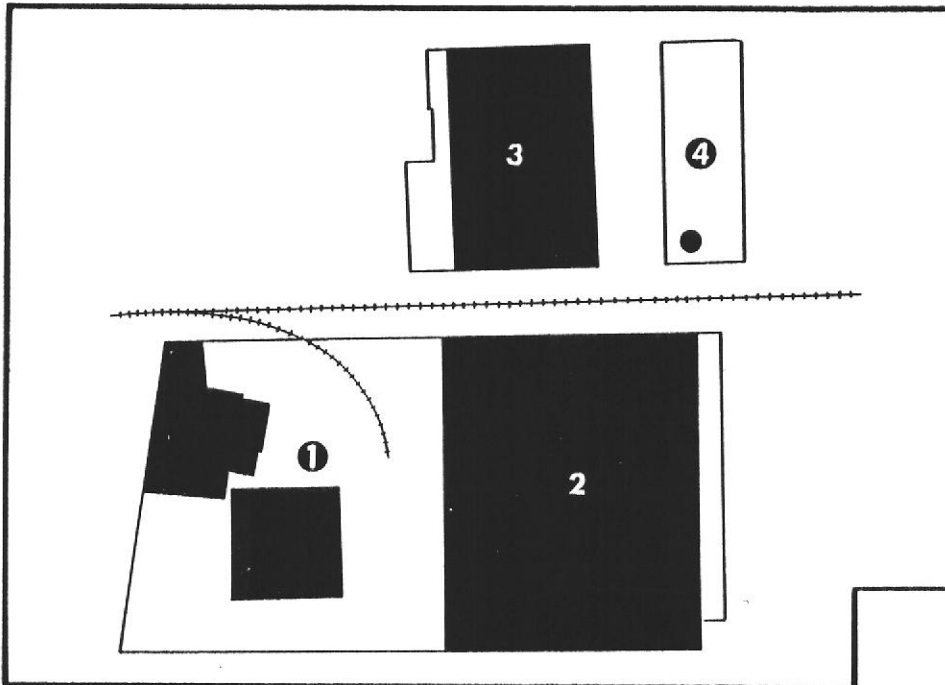
Land Area
84120 ± ±

~ 1.9
acre

FOR SALE

In Oakland, California, the former plant and adjacent properties of **DORR-OLIVER CORPORATION**

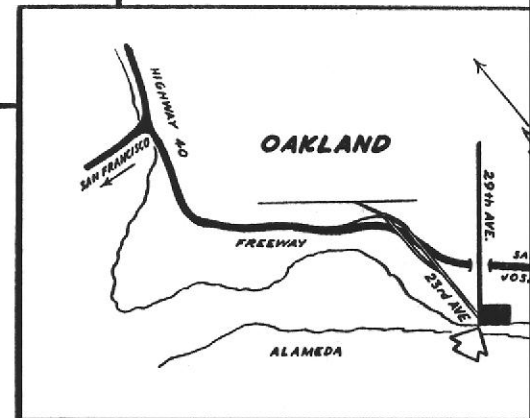
Located on Tidal Canal at junction of 23rd and 29th Avenues just south of Nimitz Freeway; San Jose and Highway 50 to the south and east; San Francisco and Highway 40 to north and west.



LAND AREA (approximately) 196,200 sq. ft.
BUILDINGS 107,000 sq. ft.

All Sprinklered

WILL SUBDIVIDE



PRESENTED BY

E. B. FIELD COMPANY

INDUSTRIAL AND BUSINESS PROPERTIES

Since 1921

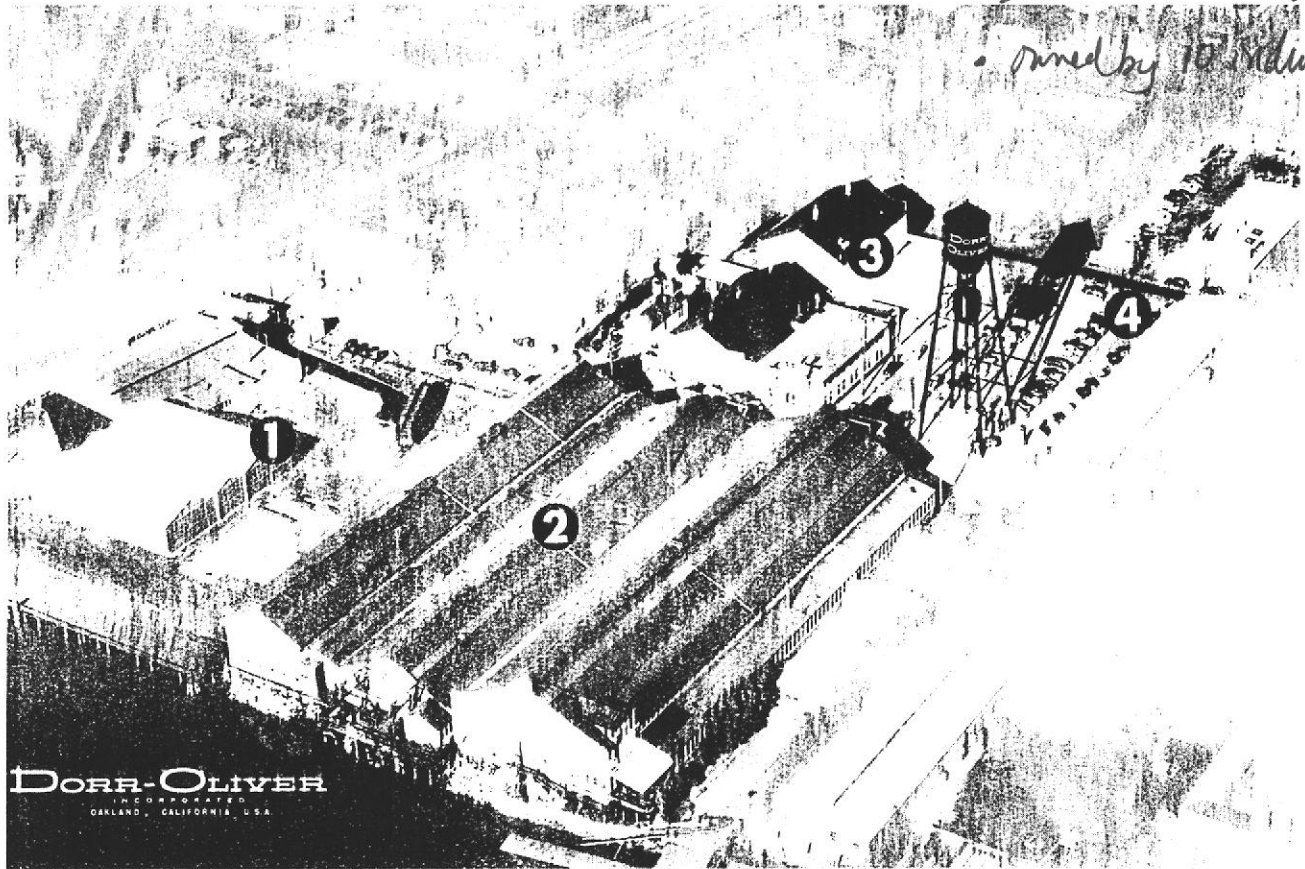
369 - 15th Street • Oakland 12, California

Hlgate 4-1391



FIRM AFFILIATE MEMBER - SOCIETY OF INDUSTRIAL REALTORS - INDUSTRY'S PLANT FINDING SERVICE

Sold 1960 by Dorr Oliver to Barker Machine
• Sold American Bldg
• owned by 10 individuals



PLANT AREA

- PARCEL 1** . . . Land 76,700 sq. ft.
Shop building 10,000 sq. ft. Warehouse and office 10,000 sq. ft.
- PARCEL 2** . . . Land 72,000 sq. ft.
Main shop building 72,000 sq. ft.
Heavy duty craneway building, with 13 cranes with capacities up to 30 tons;
heavy power installations, compressed air lines, etc.
Water depth in Tidal Canal 20 feet M.L.L.W.
- PARCEL 3** . . . Land Area 32,500 sq. ft.
Modern offices over 16,000 sq. ft. Pattern loft 10,000 sq. ft.
Available for parking 10,000 sq. ft.
- PARCEL 4** . . . Parking lot 15,000 sq. ft.

E. B. FIELD COMPANY

INDUSTRIAL AND BUSINESS PROPERTIES

369 - 15th Street • Oakland, California

Highgate 4-1391



FIRM AFFILIATE MEMBER - SOCIETY OF INDUSTRIAL REALTORS - INDUSTRY'S PLANT FINDING SERVICE

(2901) GLASCOCK STREET PARTNERS

<u>INVESTORS</u>	<u>TELEPHONE #</u>	<u>% OWNED</u>
JACOBS, SAUL W. & CARMEL J. 4375 DETROIT AVENUE OAKLAND, CA 94619	r) 510/531-4994	3.2051%
BOLES, J.L. & Mary 2300 MUELLER DRIVE RENO, NEVADA 89509	r)702/825 - 4427	3.2051%
MUIR, JAMES C. 275 OAK VUE ROAD PLEASANT HILLS, CA 94523	48345 Via Solana La Quinta, CA 92253 r) <u>945-8602</u>	9.6154%
ROBERTS, CHARLES T. Trustee ROBERTS LIVING TRUST 16300 WIENCA LOS GATOS, CA 95030	r)408/354-8265	10.8974%
LINCOLN TRUST COMPANY P.O. BOX 5831 DENVER, CO 80217 Tel. 1-800-825-2501	Special Assets (dept.) b)1-800-825-2501	
for STUDARUS, MRS. T. A. <i>60783864</i> 10 BERKSHIRE MORAGA, CA 94556	376-0948	6.4103%
WINGREN, W. MARTIN & ANN B. (Mail to Ann Wingren) @ 329 LA ESPRIAL ORINDA, CA 94563	b)408/752-2700 (?) 254-2099	9.6154%
BURAN, DENNIS P.O. BOX 1833 SAN LEANDRO, CA 94577	b)836-6100	38.4615%
CROOP ENTERPRISES INC. DEFINED BENEFIT PENSION PLAN 436 14TH ST. SUITE 305 OAKLAND, CA 94612	b)510/444-1391	14.1026%
BURKE, STEPHEN S. E. B. FIELD COMPANY 436 14TH ST. SUITE 305 OAKLAND, CA 94612	Burke Commercial Real Estate 300 Lakeside Drive S/1980, Oakland, CA 94612 b)510/444-1391	3.2051%

April 23, 1996

Mr. Barney Chan
Alameda County Health Services
1131 Harbor Bay Parkway, Room 200
Alameda, CA 94502

Via Fax: (510) 337-9335

Dear Mr. Chan:

Please be advised that I would like to copy the **Site Assessment and Remedial Action Recommendations** report, prepared by Pacific Environmental Group, dated February 29, 1996.

I understand that the standard fees for your involvement in this service is \$90.00 per hour, and that we can copy the report at your office, using our copier.

I would appreciate doing this at your earliest possible convenience. You can contact me during the business day at (510) 261-1900.

Thank you for your consideration in this matter.

Sincerely,


Gary Martz

830 April 24, th 1996

cc: John E. Weber

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Pkwy
Alameda CA 94502
510/567-6700

Hazardous Materials Inspection Form

II, III

Site ID # _____ Site Name Glascock Warehouse Today's Date 5/15/95
Site Address 2901 Glascock Ave
City Oak Zip 94601 Phone _____

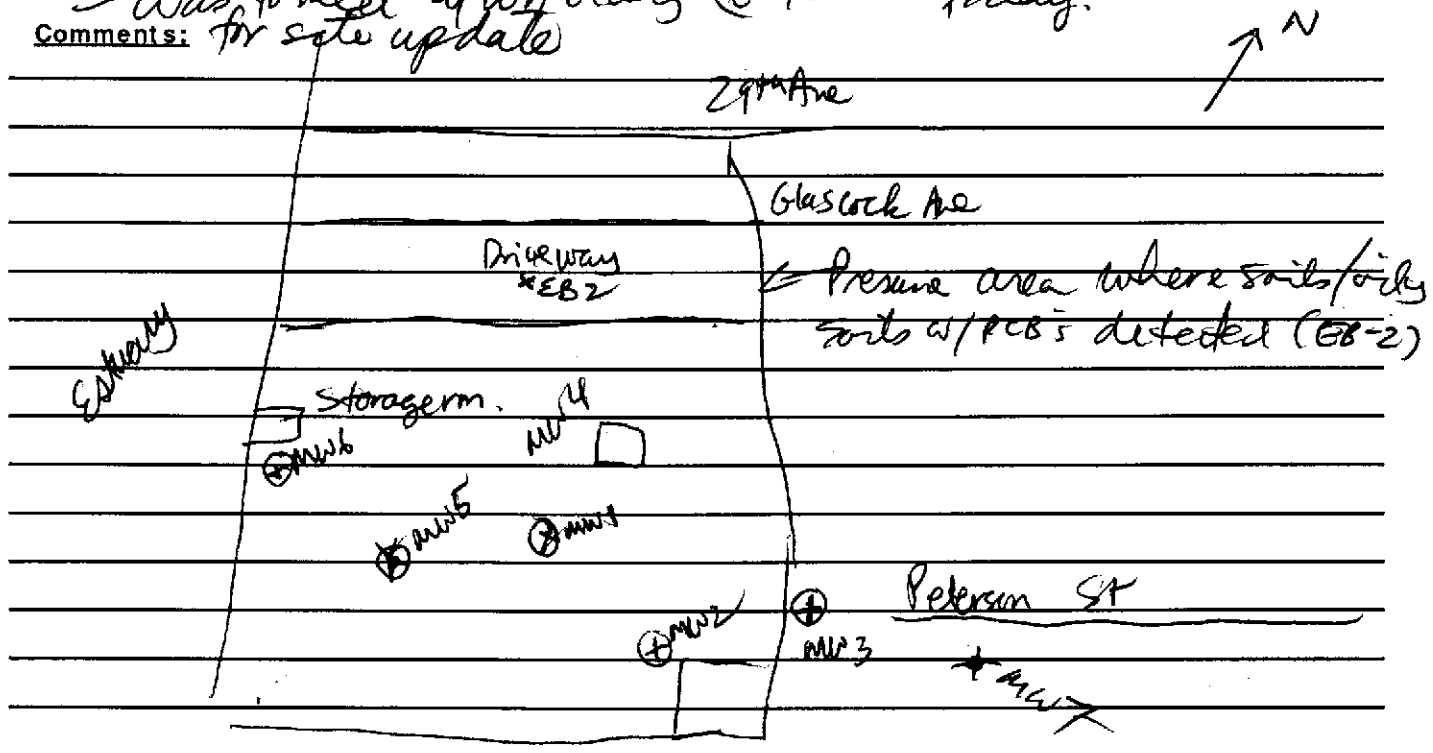
____ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- ____ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- ____ II. Hazardous Materials Business Plan, Acutely Hazardous Materials
- ____ III. Under ground Storage Tanks

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments: Was to meet w/ WA Craig @ 10:00 today for site update



Russ of WA Craig sampling wells, however, Bill Craig did not show. Was told that cylinders still on site in locked storage room. Met Bill Craig ~1040, left @ 10:30 am. toured site where added boxes

Contact _____
Title _____
Signature _____

Inspector B. Chan
Signature _____

+ samples taken left site approx 11:30

II, III

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

April 25, 1995
StID # 1138

Mr. Dennis Buran
Glascok Street Property Owners
c/o Buran Equipment Co.
P.O. Box 1833
San Leandro CA 94577

**Re: Comment on April 17, 1995 Proposal for Monitoring Well
Locations at 2901 Glascok St., Oakland CA 94601**

Dear Mr. Buran:

This letter serves to comment on the above referenced work plan proposal and to request additional actions based on the results presented in this report. Recall, your contractor, W. A. Craig was not able to complete their work plan addendum which called for the installation of nine additional soil borings to further assess the lateral migration of petroleum contamination. In addition, based on what was encountered at the site, three monitoring wells are proposed in the April 17, 1995 work plan. These well locations are acceptable on the condition that at least one well be used to extract free product and control its migration. I understand that these wells are scheduled for installation on April 27, 1995.

Because free floating product was encountered in soil borings SB-1 through SB-4 and SB-8 and SB-9 you are required to remove the free product in a manner which minimizes the spread of contamination into previously uncontaminated zones per Section 2655(b) of Title 23 of the California Underground Storage Tank Regulations. In addition, Section 2725(d) also requires the submittal of a Corrective Action Plan (CAP) which: assesses the impact of the release of chemicals in question, which evaluates the alternatives for remedying or mitigating the release and proposes applicable cleanup level for the contaminants.

Please indicate your actions to address the free product encountered at this site in a proposal to be submitted to our office **within 30 days or by May 26, 1995**. In addition, your Corrective Action Plan should be submitted **within 45 days of this work plan or by July 14, 1995**. Prior to this, you may want to meet with our office to discuss your remedial approach and your proposed cleanup levels.

Mr. Dennis Buran
StID # 1138
2901 Glascock St.
April 25, 1995
Page 2.

It may be of interest to you that this site's location will make it difficult to apply the Non-Attainment Policy, although our office will entertain a risk assessment as part of your Corrective Action Plan.

Please notify our office if your schedule for monitoring well installation changes.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: Mr. J. Dailey, W. A. Craig Inc., P.O. Box 448, Napa CA 94669-
0448

B. Reynolds, files
CAP2901

W. A. CRAIG, INC.

Industrial and Environmental Contractor

P. O. Box 448

Napa, California 94559-0448

Contractor and Hazardous Substances License #455752

Cal/OSHA Statewide Annual Excavation Permit 559351

(800) 522-7244

Phone: (510) 525-2780 Berkeley

Napa (707) 252-3353

Fax: (707) 252-3385

April 5, 1995

Glascock Street Properties

Mr. Dennis Buran

436 14th Street, Room 305

Oakland, Ca. 94612

Telephone: (510) 444-1391

Fax: (510) 444-1394

Subject: Update on current contract - Job #3406

Reference: Our current approved work plan for soil and ground water investigation.

Dear Sirs:

We have finished the initial borings on the site as agreed, per the work plan.

We were unable to get 9 borings due to the extreme thickness of the concrete in 3 locations that were in excess of 2 inches thick. We did get 8 borings and these will be sufficient to address the methods of remediation of the site which will be considered in our next report.

We found substantial floating product in 6 of the borings. The laboratory analysis on the soil and ground water samples have not been received from the laboratory as of today's date.

We were scheduled to place 3 more monitoring wells at the site this Friday, April 7, 1995. However, due to the difficulty in obtaining an encroachment permit from the City of Oakland, we have delayed this drilling until April 17, 1995.

Please feel free to call me should you have any questions.

Sincerely,


W. A. Craig II

President

cc: Barney Chan, Alameda County Department of Environmental Health

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

February 21, 1995
StID # 1138

Mr. Richard Croop
E. B. Field Company
436 14th St., Suite 305
Oakland CA 94612

DEPARTMENT OF ENVIRONMENTAL HEALTH
ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIV.
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

**Re: Comment on Progress Report and Work Plan for Additional
Investigation at 2901 Glascock Ave., Oakland CA 94601**

Dear Mr. Croop:

Thank you for the submission of the above referenced report. It was hand delivered to me by Mr. Craig on February 16, 1995. I have completed my review of the report and it is acceptable. Please keep the following items in mind while you proceed with your next soil/groundwater investigation:

1. Please proceed with the soil borings and groundwater sampling **within the next 45 days**. This will allow you to provide a report of your findings within the next quarterly monitoring event ie by May 21, 1995. Please contact me at least **48 hours** prior to your field work so I may arrange to witness your activities if possible.
2. Based on the observations and analytical results of groundwater samples, a groundwater remediation system will be required for this site. In addition, should free product be present, you are required to make every effort to remove such product and take actions to prevent its migration to previously uncontaminated areas.
3. Your next technical report should also provide a timetable for the submittal of your Final Remediation Plan (FRP) as mentioned in this report.

You should contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: Mr. J. Dailey, 141 H. St., Suite A, Petaluma, CA 94952
Mr. W. A. Craig, P.O. Box 448, Napa, CA 94559-0448
E. Howell, files
2wpap2901

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIV.
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

January 18, 1995
StID # 1138

Mr. Richard Croop
E.B. Field Company
436 14th St., Suite 305
Oakland CA 94612

**Re: Extension for Submittal of Work Plan for Additional Site
Investigation at 2901 Glascock Ave., Oakland CA 94601**

Dear Mr. Croop:

Our office has received the January 3, 1995 request from Mr. W. A. Craig requesting an extension for the submittal of a specific work plan for the further definition of soil and groundwater contamination at the above site. He anticipated the submittal could be made by February 21, 1995. This extension is approved by our office.

Please be reminded that quarterly groundwater monitoring should continue at this site until further notice from our office or that of the RWQCB (Regional Water Quality Control Board). Your next monitoring event should have occurred either late December 1994 or early January 1995. In accordance with my December 8, 1994 letter, your quarterly groundwater monitoring report should also be submitted to our office no later than the same date mentioned above ie **February 21, 1995**. Please insure that this report includes a table of all previous groundwater analytical data, groundwater elevation data, a groundwater gradient map and details of all measures used to remove free product from the wells.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Barney M. Chan".

Barney M. Chan
Hazardous Materials Specialist

cc: Mr. J. Dailey, 141 H St., Suite A, Petaluma, CA 94952
Mr. W. A. Craig, P.O. Box 448, Napa, CA 94559-0448
E. Howell, files
ext-2901

HAZMAT

98 JAN -5 PM 2:49

W. A. CRAIG, INC.

Industrial and Environmental Contractor

P. O. Box 448

Napa, California 94559-0448

Contractor and Hazardous Substances License #455752

Cal/OSHA Statewide Annual Excavation Permit #559351

(800) 522-7244

Berkeley (510) 525-2780

Fax: (707)-252-3385

Napa (707) 252-3353

January 3, 1995

Alameda County
Department of Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
Attn: Barney Chan

Reg: Soil and Ground Water Investigation at
2901 Glascock Ave, Oakland, California

Subj: Request for 30 day Extension

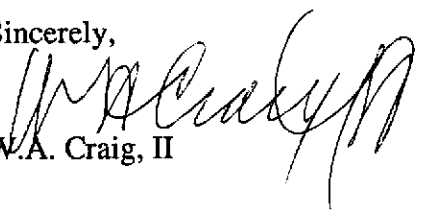
Ref: S & ID #1138

Dear Mr. Chan:

Per your letter of 12/8/94, which we received on the 16th of December, a soil and ground water investigation work plan is to be delivered to you by January 13, 1995 for the Ref. site.

Due to the complexity of ownership of the property and responsible parties, we must submit cost analysis and obtain approval prior to proceeding with any work. We are in the process of doing this now. Due to the holidays, we have been unable to obtain approval as of yet. We expect to obtain approval this week. We are requesting a due date of February 21, 1995.

Please respond in writing your approval of this extension.

Sincerely,

W.A. Craig, II

WAC/bw

cc: Glascock Property Group
British Petroleum

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, DIRECTOR

~~December 8, 1994~~

StID # 1138

DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 729-6777

Mr. Richard Croop
E.B. Field Company
436 14th St., Suite 305
Oakland CA 94612

**Re: Comment on December 2, 1994 Report, Soil and Ground Water
Investigation at 2901 Glascock Ave, Oakland CA 94601**

Dear Mr. Croop:

Our office has just received and reviewed the above referenced report as provided by your consultant, W. A. Craig, Inc. The field work was overseen by both Mr. Craig and Mr. John Dailey. As you are aware, four shallow groundwater monitoring wells were installed late September 1994 and water samples were taken in early October. The results of both soil and groundwater samples indicate contamination of both kind, the limits of which are yet undefined. Free floating product was observed in both monitoring wells MW-1 and MW-2. In this report, your consultant recommends the advancement of an additional 8-14 borings and the conversion of 2 or 3 of these borings into monitoring wells. Both soil and groundwater samples would be taken. The extent of petroleum contamination is assumed to be determinable through this work. In general, this approach is acceptable. Our office requests a work plan detailing the **specifics** of this work.

Please provide your work plan to our office **within 30 days or by January 13, 1995.**

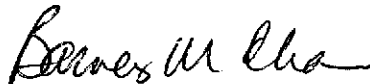
In addition our office requires the following items:

1. Please be aware should free product continue to be found in any of the wells at this site, you are required per Section 2655 of Title 23, Chapter 16 of the California Underground Storage Tank Regulations ie free product must be removed in a **maner** that minimizes the spread of contamination into previously uncontaminated zones...
2. Please note that in the text of this report, monitoring well MW-3 is reported to have detected 320 ppm diesel. The actual amount according to the analytical report is 320 ppb, a concentration of much less significance than 320 ppm.
3. From this point on, groundwater monitoring of all existing wells must be performed on a quarterly basis. Your next sampling event should occur in January 1995 and reports are due **within 45 days of the sampling event.** In your subsequent monitoring reports please include a **groundwater gradient map.**

Mr. Richard Croop
StID # 1138
2901 Glascock Ave.
December 8, 1994
Page 2.

I assume you are still the contact person for the Glascock Partners even though the cover letter of this report is addressed to Mr. Dennis Buran. Please contact ^{me} at (510) 567-6765 with any questions, comments or corrections.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: Mr. J. Dailey, 141 H St., Suite A, Petaluma, CA 94952
Mr. W. A. Craig, P.O. Box 448, Napa, CA 94559-0448
E. Howell, files

2wp-2901

white -env.health
 yellow -facility
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH
 Hazardous Materials Inspection Form

80 Swan Way, #200
 Oakland, CA 94621
 (415) 271-4320

II, III

Site ID # _____ Site Name Glasecock Ave Warehouse Today's Date 9/23/99

Site Address 2901 Glasecock

City _____ Zip 94601 Phone _____

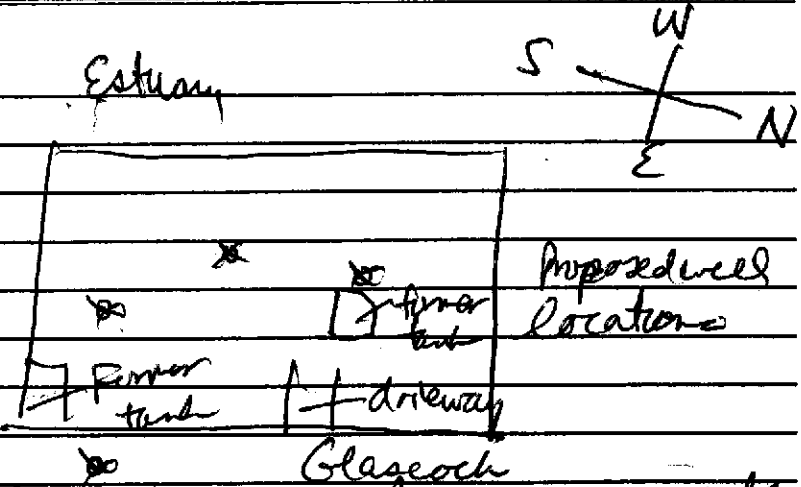
MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:



- II.A BUSINESS PLANS (Title 19)
- 1. Immediate Reporting 2703
 - 2. Bus. Plan Stds. 25503(b)
 - 3. RR Cars > 30 days 25503.7
 - 4. Inventory Information 25504(a)
 - 5. Inventory Complete 2730
 - 6. Emergency Response 25504(b)
 - 7. Training 25504(c)
 - 8. Deficiency 25505(a)
 - 9. Modification 25505(b)

- II.B ACUTELY HAZ. MATLS
- 10. Registration Form Filed 25533(a)
 - 11. Form Complete 25533(b)
 - 12. RMPP Contents 25534(c)
 - 13. Implement Sch. Req'd? (Y/N) _____
 - 14. OffSite Conseq. Assess. 25524(c)
 - 15. Probable Risk Assessment 25534(d)
 - 16. Persons Responsible 25534(g)
 - 17. Certification 25534(i)
 - 18. Exemption Request? (Y/N) 25536(b)
 - 19. Trade Secret Requested? 25538

- III. UNDERGROUND TANKS (Title 23)
- General
- 1. Permit Application 25284 (H&S)
 - 2. Pipeline Leak Detection 25292 (H&S)
 - 3. Records Maintenance 2712
 - 4. Release Report 2651
 - 5. Closure Plans 2670

- Monitoring for Existing Tanks
- 6. Method
 - 1) Monthly Test
 - 2) Daily Vadose
 - Semi-annual groundwater
 - One time soils
 - 3) Daily Vadose
 - One time soils
 - Annual tank test
 - 4) Monthly Groundwater
 - One time soils
 - 5) Daily Inventory
 - Annual tank testing
 - Cont pipe leak det
 - Vadose/groundwater mon.
 - 6) Daily Inventory
 - Annual tank testing
 - Cont pipe leak det
 - 7) Weekly Tank Gauge
 - Annual tank test
 - 8) Annual Tank Testing
 - Daily Inventory
 - 9) Other _____

- 7. Precs Tank Test 2643
 - Date: _____
- 8. Inventory Rec. 2644
- 9. Soil Testing 2646
- 10. Ground Water. 2647

- New Tanks
- 11. Monitor Plan 2632
 - 12. Access. Secure 2634
 - 13. Plans Submit 2711
 - Date: _____
 - 14. As Built 2635
 - Date: _____

Glasecock

Witnessed that a MW had been installed in center of bldg and the well next to the tank (cont) was being installed. W. Craig + J. Dunley present. Informed that F.P. found in the center MW & diesel odors being detected in both the well w/ the former tank. Odor detected @ ~ 7' & BW encountered at ~ 13' pools are slayer + layered sand gray color

Rev 8/88

II, III

Contact: _____

Title: _____

Signature: _____

Inspector: BChan

Signature: _____

W. A. CRAIG, INC.

Industrial and Environmental Contractor

P. O. Box 448

Napa, California 94559-0448

Contractor and Hazardous Substances License #455752

Cal/OSHA Statewide Annual Excavation Permit 556208

(800) 522-7244

Berkeley (510) 525-2780

Fax: (707)-252-3385

Napa (707) 252-3353

ALCO
HAZMAT

94 SEP 13 PM 1:43

September 9, 1994

Mr. Barney Chan
Alameda County Dept. of Environmental Health
Division of Hazardous Materials
1131 Harbor Bay Parkway - 2nd Floor
Alameda, California 94502

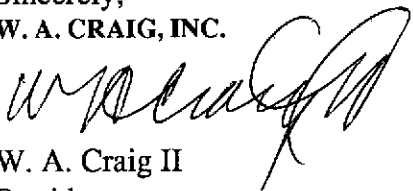
Re: Groundwater Monitoring Well Installations

Dear Mr. Chan:

A drilling permit application has been submitted to Zone 7 Agency for the purpose of installing a total of four (4 ea.) groundwater monitoring wells at 2901 Glascock Avenue in Oakland. At this time the estimated starting date of the work is September 23, 1994. I will confirm that date with you upon receipt of the approved permit from Zone 7 Agency.

Please give me a call if you have any questions.

Sincerely,
W. A. CRAIG, INC.


W. A. Craig II
President

cc: Glascock file

WAC:mgl

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

August 25, 1994
StID # 1138

Mr. Richard Croop
E. B. Field Company
436 14th St., Suite 305
Oakland CA 94612

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: Comment on August 5, 1994 Work Plan for the Installation of
Monitoring Wells at 2901 Glascock Ave., Oakland CA 94601**

Dear Mr. Croop:

Thank you for the submission of above referenced work plan as prepared by Mr. John Dailey. I have completed my review and exchanged comments with Mr. Dailey regarding the work plan's contents. One concern I expressed was that soil samples taken after over-excavation were only field screened, therefore, actual concentrations of residual contamination are not known. Mr. Dailey stated that additional borings would be taken later to determine the residual contamination. This is acceptable, however, wouldn't it be more cost effective to avoid a second mobilization? Be advised, our office will need to be present to witness these additional borings.

The work plan calls for the installation of four monitoring wells at this site; one each in the assumed downgradient direction relative to the former tanks and one each in the upgradient and downgradient direction of both tanks. You may proceed with this work plan with the following condition:

1. Please analyze all soil samples from the soil/water interface by a certified lab for TPH as diesel, BTEX and TPH as motor oil. All other soil samples should be field screened by an OVA instrument at a minimum.
2. As mentioned in the plan, please contact me at (510) 567-6700 at least 48 hours in advance of any field work.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: Mr. J. Dailey, 141 H St., Suite A, Petaluma, CA 94952
Mr. W. A. Craig, P. O. Box 448, Napa, CA 94559-0448
E. Howell, files

wpap2901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



AUG 30 1994

RAFAT A. SHAI III, Assistant Agency Director

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

August 24, 1994

Mr. Richard Croop
436 14th Street, Suite 305
Oakland, CA - 94612

Reference: 2901 Glascock Avenue, Oakland, CA

Dear Mr. Croop:

In response to your request for closure for the above referenced site, the document submitted to this Department "Site Closure Report" dated January 21, 1994 has been reviewed and evaluated for closure. Also, a no further action letter from the San Francisco Regional Water Quality Control Board has been submitted to this office.

The above referenced property consists of undeveloped land and a large warehouse. At the request of the San Francisco Regional Water Quality Control Board, the metal shavings and slag material on the shores were excavated and transferred to the warehouse onsite and stockpiled.

In January 12, 1993 two soil samples were collected from the excavated area and analyzed for seventeen priority pollutants metals. The laboratory results indicated significant concentrations of metals in the soil samples.

In June 1993, 3 verification and 2 background samples were collected under the guidance of the San Francisco Regional Water Quality Control Board. Laboratory analysis of verification soil samples collected from the excavation indicated concentrations of metals lower than background levels.

In December 1993, approximately 288 cubic yards of stockpiled soils were manifested and hauled away to a disposal site. The manifests have been submitted to this office.

Based upon the available information and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action is required at the above referenced site.

If you have any questions, call me.

Yours Sincerely,

Madhulla Logan

Madhulla Logan
Hazardous Material Specialist

re Croop - E B Mills Co

729-6777

//

//

Hygienetics Environmental

Hygienetics Environmental Services, Inc.

Airport Corporate Centre
Suite 1.150
7677 Oakport Street
Oakland, CA 94621
Phone: (510) 430-2843
Fax: (510) 430-9286

August 1, 1994

Ms. Juliette Blake
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway
Room 250
Alameda, California 94502-6577

*tentatively schedule
for tuesday 8/23/94*

Dear Ms. Blake:

I would like to schedule an appointment to review files for the following sites. According to Mr. Barney Chan, your agency has files on these sites and they are available for review at the rate of \$90 per hour.

- 2901 Glascock Avenue (1138)
Local oversight files for 2 LUSTs removed in 1993
Files for slag pile disposed of in 1993.

94601

In addition, I would like to review any information you may have on the following sites:

- Oakland Housing Authority (1180 25th Avenue) (NO LOP)
1180 25th Avenue
Oakland, California
- Esposito Plating Corporation (89)
2904 Chapman Street
Oakland, California (601)
- US 12th Coast Guard District
Governor's Island
- Rocky's Auto Body (1275 - Closed LOP)
2405 Eagle Avenue
Alameda, California (601)
- Port of Oakland
Dennison and Embarcadero

ALCO
HAZMAT
94 AUG -2 PM 7:55

I would like to schedule an appoint as soon as possible for these sites. Please call me at 510/430-2843 so that I may arrange a mutually convenient time for this. Thanks for your help.

Sincerely,

William A. Bir
Staff Engineer

BRITTY JOHNSON

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
80 SWAN WAY, ROOM 200
OAKLAND, CA 94621
PHONE NO. 510/271-4320

7/31/97

ACCEPTED
DEPARTMENT OF ENVIRONMENTAL HEALTH
450 - 52nd Street, 10th Floor
Oakland, CA 94612
Telephone: (415) 874-9227

These plans have been reviewed and found to be acceptable and essentially meet the requirements of State and local health laws. Changes to your plans indicated by this Department are to ensure compliance with State and local laws. The present proposed permit is subject to the issuance of any required building permits for your location. One copy of these accepted plans must be available and available to all contractors and employees involved with the removal.

Any change or alterations of these plans and/or conditions must be submitted to this Department and to the Fire and Building Inspection Department for approval. It is the responsibility of the applicant to ensure that all such changes meet the requirements of State and local laws. Notify this Department at least 48 hours prior to the following required activities:

Removal of Tank and Piping
Sealing
Final Inspection

Issuance of a permit to operate is dependent on compliance with accepted plans and all applicable regulations.

THIS IS A PERMIT TO OPERATE UNDER THE
CALIFORNIA PERMIT TO OPERATE ACT

UNDERGROUND TANK CLOSURE PLAN

*** * * Complete according to attached instructions * * ***

- Business Name GLASCOCK AVE WAREHOUSE
Business Owner GLASCOCK AVE PARTNERS
 - Site Address 2901 GLASCOCK AVE
City OAKLAND Zip 94601 Phone 510-444-1391
 - Mailing Address 425 MARKET ST
City OAKLAND Zip 94607 Phone 510-444-1391
 - Land Owner GLASCOCK AVE PARTNERS
Address 425 MARKET ST city, state OAKLAND CA zip 94607
 - Generator name under which tank will be manifested _____
GLASCOCK AVE PARTNERS
- EPA I.D. No. under which tank will be manifested CAC 000859272

6. Contractor PACIFIC RIM ENV. SERVICES INC.
Address 42 OTIS ST SOMER
City SAN FRANCISCO, CA 94103 Phone 415-255-0860
License Type A' HAZ ID# 699163 ENR 7/31/94

*Effective January 1, 1992, Business and Professional Code Section 7058.7 requires prime contractors to also hold Hazardous Waste Certification issued by the State Contractors License Board. Indicate that the certificate has been received, in addition, to holding the appropriate contractors license type.

7. Consultant SAME AS ABOVE
Address _____
City _____ Phone _____

8. Contact Person for Investigation
Name DON JAMES Title PRESIDENT
Phone 415-255-0860

9. Number of tanks being closed under this plan 2
Length of piping being removed under this plan 0
Total number of tanks at facility 2

10. State Registered Hazardous Waste Transporters/Facilities (see instructions).

** Underground tanks are hazardous waste and must be handled **
as hazardous waste

a) Product/Residual Sludge/Rinsate Transporter

Name N/A EPA I.D. No. _____
Hauler License No. _____ License Exp. Date _____
Address _____
City _____ State _____ Zip _____

b) Product/Residual Sludge/Rinsate Disposal Site

Name N/A EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

c) Tank and Piping Transporter

Name ERICKSON EPA I.D. No. CAD 009466392
Hauler License No. 0019 License Exp. Date NO EXP
Address 255 PARR BLVD
City RICHMOND State CA Zip 94801

d) Tank and Piping Disposal Site

Name ERICKSON EPA I.D. No. CAD 009466392
Address 255 PARR BLVD
City RICHMOND State CA Zip 94801

11. Experienced Sample Collector

Name Don JAMES
Company PACIFIC RIM ENV SERV INC
Address 42 OTIS ST SUITE 4
City SF State CA Zip 94103 Phone 415-255-9860

12. Laboratory

Name CAL TEST ANALYTICAL
Address 1885 KELLY ROAD
City NAPA State CA Zip 94558
State Certification No. 1664

13. Have tanks or pipes leaked in the past? Yes [] No [X]

If yes, describe. _____

14. Describe methods to be used for rendering tank inert

DRY ICE
25 lbs PER 1000 GAL. VOLUME

Before tanks are pumped out and inerted, all associated piping must be flushed out into the tanks. All accessible associated piping must then be removed. Inaccessible piping must be plugged.

The Bay Area Air Quality Management District (771-6000), along with local Fire and Building Departments, must also be contacted for tank removal permits. Fire departments typically require the use of explosion proof combustible gas meters to verify tank inertness. It is the contractor's responsibility to bring a working combustible gas meter on site to verify tank inertness.

15. Tank History and Sampling Information

Tank		Material to be sampled (tank contents, soil, ground-water, etc.)	Location and Depth of Samples
Capacity	Use History (see instructions)		
20,000 4,000	INSTALLATION DATE UNKNOWN FORMER USAGE CUTTING OIL FOR MACHINE WORKS TANKS HAVE NOT BEEN IN USE FOR ATLEAST 20 YEARS	1 SOIL OR GROUNDWATER 20K 2 SOIL 4K 1 EACH WATER IF PRESENT	24" BELOW TANK BOTTOM AND

One soil sample must be collected for every 20 feet of piping that is removed. A ground water sample must be collected should any ground water be present in the excavation.

Excavated/Stockpiled Soil	
Stockpiled Soil Volume (Estimated)	Sampling Plan
30 YARDS	NO SAMPLING PLANNED UNLESS REQUIRED

Stockpiled soil must be placed on bermed plastic and must be completely covered by plastic sheeting.

16. Chemical methods and associated detection limits to be used for analyzing samples

The Tri-Regional Board recommended minimum verification analyses and practical quantitation reporting limits should be followed. See attached Table 2.

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit
UNKNOWN FUEL	TPH G TPH D BTEX 8020 8260		

17. Submit Site Health and Safety Plan (See Instructions)

18. Submit Worker's Compensation Certificate copy

Name of Insurer GOLDEN EAGLE INSURANCE CO.

19. Submit Plot Plan (See Instructions)

20. Enclose Deposit (See Instructions)

21. Report any leaks or contamination to this office within 5 days of discovery. The report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report form. (see Instructions)

22. Submit a closure report to this office within 60 days of the tank removal. This report must contain all the information listed in item 22 of the instructions.

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true.

I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel health and safety. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

Once I have received my stamped, accepted closure plan, I will contact the project Hazardous Materials Specialist at least three working days in advance of site work to schedule the required inspections.

Signature of Contractor

Name (please type) PACIFIC RIM ENVIRONMENTAL SERVICES INC

Signature [Handwritten Signature] Don W James

Date 19 JAN 1992

Signature of Site Owner or Operator

Name (please type) _____

Signature _____

Date _____

CERTIFICATE OF INSURANCE

12/29/92

PRODUCER
DiBuduo and DeFendis Insurance
 5665 California Ave., St. 100
 Bakersfield, CA
 93309
 PHONE 805-322-9993

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

COMPANIES AFFORDING COVERAGE

- COMPANY LETTER A **GOLDEN EAGLE INSURANCE CO.**
- COMPANY LETTER B
- COMPANY LETTER C
- COMPANY LETTER D
- COMPANY LETTER E

INSURED
PACIFIC RIM ENVIRONMENTAL SERVICES, INC
 P O BOX 192972
 SAN FRANCISCO, CA
 94119

> COVERAGES <=====
 THIS IS TO CERTIFY THAT POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL TERMS, EXCLUSIONS, AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFF DATE	POLICY EXP DATE	ALL LIMITS IN THOUSANDS	
					EACH OCC	AGGREGATE
A	GENERAL LIABILITY	CCP190299-00	06/12/92	06/12/93	GENERAL AGGREGATE	1000
	<input checked="" type="checkbox"/> COMMERCIAL GEN LIABILITY				PRODS-COMP/OPS AGG.	1000
	<input type="checkbox"/> [] CLAIMS MADE <input checked="" type="checkbox"/> OCC.				PERS. & ADVG. INJURY	1000
	<input type="checkbox"/> OWNER'S & CONTRACTORS PROTECTIVE				EACH OCCURRENCE	1000
	<input type="checkbox"/>				FIRE DAMAGE (ANY ONE FIRE)	50
	<input type="checkbox"/>				MEDICAL EXPENSE (ANY ONE PERSON)	5
	<input type="checkbox"/>				CSL	
	AUTOMOBILE LIAB				BODILY INJURY (PER PERSON)	
	<input type="checkbox"/> ANY AUTO				BODILY INJURY (PER ACCIDENT)	
	<input type="checkbox"/> ALL OWNED AUTOS				PROPERTY	
	EXCESS LIABILITY					
	<input type="checkbox"/> UMBRELLA FORM					
A	WORKERS' COMP AND EMPLOYERS' LIAB	NWC183579-00	07/05/92	07/05/93	STATUTORY	1000
					EACH ACC DISEASE-POLICY LIMIT	1000
	OTHER				DISEASE-EACH EMPLOYEE	1000

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS
JOBSITE: 1901 GLASCOCK AVE, OAKLAND, CA

> CERTIFICATE HOLDER <=====
ALAMEDA COUNTY DEPT OF ENVIRONMENTAL HEALTH
 80 SWAN WAY, RM 200
 OAKLAND, CA
 94621

CANCELLATION <=====
 = SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 10 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.
 = AUTHORIZED REPRESENTATIVE

E. B. FIELD COMPANY

SINCE 1921

INDUSTRIAL & COMMERCIAL REAL ESTATE

ALCO
HAZMAT

Central Building
436 14th Street, Room 305
Oakland, CA 94612-2708
(510) 444-1391 FAX 444-1394

94 MAR 11 PM 2:22

MARCH 10, 1993⁴

Parcel oil

*Tanks
Removal*] 4/5/93

Alameda County Hazardous
Materials Service Division
805 Swan Way Room 200
Oakland, CA 94621

Gentlemen:

We have long since completed the removal of 2 underground tanks at 2901 Glascock Street on a property that we took back on a loan foreclosure. We didn't even know there were any tanks on the property but we hired the Pacific Rim to complete the work, and they submitted a tank closure report to you nearly two months ago.

Anything you can do to expedite the approval of this project would be appreciated.

We have a pending sale on the property and we are anxiously awaiting this approval.

Sincerely yours,

R C Croop
R. C. Croop

rcc/ve

Enclosure

Note: Pacific Rim took some test borings that I believe indicated ground water contamination.

I specialize in industrial real estate and I recall there was a problem on some nearby property that also indicated some hydrocarbon in the ground water. One of these was the Gilro Building at 2915 Ford Street, across the street from the subject property, also the former Shell Oil property on Glascock extending between Peterson and Derby Streets. As I recall, these were approved because the entire area between 29th Avenue and Fruitvale showed some ground water contamination.

rcc



PACIFIC RIM ENVIRONMENTAL

Post Office Box 192972
San Francisco, CA U.S.A. 94119
Phone: 415-255-0860 Fax: 415-431-0334

Tank Closure Report

97077

Prepared for:

**Mr. Richard Croop
436 14th Street, Suite 305
Oakland, California 94612**

Prepared By:

**Pacific Rim Environmental
P.O. Box 192972
San Francisco, California**

Project Location:

**2901 Glasscock Avenue
Oakland, California**

94601

**Don W. James
Project Manager
Pacific Rim Environmental**

January 21, 1994

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Inspection Form

II, III

Site ID # _____ Site Name GLASCOCK WAREHOUSE Today's Date 2/26/93

II.A BUSINESS PLANS (Title 19)

- ___ 1. Immediate Reporting 2703
- ___ 2. Bus. Plan Stds. 25503(b)
- ___ 3. RR Cars > 30 days 25503.7
- ___ 4. Inventory Information 25504(a)
- ___ 5. Inventory Complete 2730
- ___ 6. Emergency Response 25504(b)
- ___ 7. Training 25504(c)
- ___ 8. Deficiency 25505(a)
- ___ 9. Modification 25505(b)

Site Address 2901 GLASCOCK AVE

City OAKLAND Zip 94601 Phone _____

MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- ___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- ___ II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks REMOVAL

II.B ACUTELY HAZ. MATLS

- ___ 10. Registration Form Filed 25533(a)
- ___ 11. Form Complete 25533(b)
- ___ 12. RMPP Contents 25534(c)
- ___ 13. Implement Sch. Req'd? (Y/N)
- ___ 14. OffSite Conseq. Assess. 25524(c)
- ___ 15. Probable Risk Assessment 25534(d)
- ___ 16. Persons Responsible 25534(g)
- ___ 17. Certification 25534(i)
- ___ 18. Exemption Request? (Y/N) 25536(b)
- ___ 19. Trade Secret Requested? 25538

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

REMOVAL OF 20,000 STEEL UST
~~SEVERELY~~ (0930 - 1000 TO SITE)

III. UNDERGROUND TANKS (Title 23)

- General
- ___ 1. Permit Application 25284 (H&S)
 - ___ 2. Pipeline Leak Detection 25292 (H&S)
 - ___ 3. Records Maintenance 2712
 - ___ 4. Release Report 2651
 - ___ 5. Closure Plans 2670

- Monitoring for Existing Tanks
- ___ 6. Method
 - 1) Monthly Test
 - 2) Daily Vadose Semi-annual groundwater One time soils
 - 3) Daily Vadose One time soils Annual tank test
 - 4) Monthly Gndwater One time soils
 - 5) Daily Inventory Annual tank testing Cont pipe leak det Vadose/gndwater mon.
 - 6) Daily Inventory Annual tank testing Cont pipe leak det
 - 7) Weekly Tank Gauge Annual tank testing
 - 8) Annual Tank Testing Daily inventory
 - 9) Other _____

- ___ 7. Precs Tank Test Date: _____ 2643
- ___ 8. Inventory Rec. 2644
- ___ 9. Soil Testing . 2646
- ___ 10. Ground Water. 2647

- New Tanks
- ___ 11. Monitor Plan 2632
 - ___ 12. Access. Secure 2634
 - ___ 13. Plans Submit Date: _____ 2711
 - ___ 14. As Built Date: _____ 2635

1) 4,000 GALLON STEEL UST HERE WITH CUTTING OIL (NON-WASTE) REMOVED TUE 2/23/93 PIT HAS WATER WITH SLIGHT SLOSH. ACCORDING TO DON JAMES NO USABLE HOLES IN UST. OAKLAND FIRE DEPT INSP. GORDON GOURT SUPERVISOR REMOVAL & SOIL SAMPLING

2) 1030 HRS RETURNED G. GOURT OFD ON SITE & BRUCSON TRUCK REMOVAL STARTED

20,000 GALLON STORED PURE OIL (HEAVY). TANK WAS ENCASED IN CEMENT (AS A HOLD DOWN METHOD)

Rev 6/88

Contact: _____
Title: _____
Signature: _____

Inspector: BRITT JOHNSON
Signature: BJ

II, III

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

II, III

Site ID # _____ Site Name _____ Today's Date 2/26/93

II.A BUSINESS PLANS (Title 19)

- ___ 1. Immediate Reporting 2703
- ___ 2. Bus. Plan Stds. 25503(b)
- ___ 3. RR Cars > 30 days 25503.7
- ___ 4. Inventory Information 25504(a)
- ___ 5. Inventory Complete 2730
- ___ 6. Emergency Response 25504(b)
- ___ 7. Training 25504(c)
- ___ 8. Deficiency 25505(a)
- ___ 9. Modification 25505(b)

Site Address 2901 GLASCOCK

City _____ Zip 94 Phone _____

___ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- ___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- ___ II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks REMOVAL

II.B ACUTELY HAZ. MATLS

- ___ 10. Registration Form Filed 25533(a)
- ___ 11. Form Complete 25533(b)
- ___ 12. RMPP Contents 25534(c)
- ___ 13. Implement Sch. Req'd? (Y/N) _____
- ___ 14. OffSite Conseq. Assess. 25524(c)
- ___ 15. Probable Risk Assessment 25534(d)
- ___ 16. Persons Responsible 25534(g)
- ___ 17. Certification 25534(f)
- ___ 18. Exemption Request? (Y/N) 25536(b)
- ___ 19. Trade Secret Requested? 25538

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

Collect 4 soil & 2 H₂O
SAMPLES

TPH - D
OIL & GREASE
BTNR (8020)

SLIGHT SINKEN OF GROUND
WATER AT BOTTOM OF
EXCAVATION

UST HAD NO USABLE HOLES

III. UNDERGROUND TANKS (Title 23)

- General**
- ___ 1. Permit Application 25284 (H&S)
 - ___ 2. Pipeline Leak Detection 25292 (H&S)
 - ___ 3. Records Maintenance 2712
 - ___ 4. Release Report 2651
 - ___ 5. Closure Plans 2670

- Monitoring for Existing Tanks**
- ___ 6. Method
 - 1) Monthly Test
 - 2) Daily Vadose Semi-annual groundwater One time soils
 - 3) Daily Vadose One time soils Annual tank test
 - 4) Monthly Gndwater One time soils
 - 5) Daily Inventory Annual tank testing Cont pipe leak det Vadose/gndwater mon.
 - 6) Daily Inventory Annual tank testing Cont pipe leak det
 - 7) Weekly Tank Gauge Annual tank teting
 - 8) Annual Tank Testing Daily Inventory
 - 9) Other _____

- ___ 7. Precs Tank Test Date: _____ 2643
- ___ 8. Inventory Rec. 2644
- ___ 9. Soil Testing . 2646
- ___ 10. Ground Water. 2647

- New Tanks**
- ___ 11. Monitor Plan 2632
 - ___ 12. Access. Secure 2634
 - ___ 13. Plans Submit Date: _____ 2711
 - ___ 14. As Built Date: _____ 2635

Rev 6/88

Contact: Don James for Pacific Rim

Title: _____

Signature: _____

Inspector: Bruce Johnson

Signature: _____

II, III