

**MEMORANDUM**  
**Alameda County Department of Environmental Health**

DATE: June 9, 1997  
TO: Madhulla Logan  
FROM: Amy Leech  
SUBJECT: RBCA Evaluation for Former Merrit Tires at 3430 Castro Valley Blvd, Castro Valley  
STID #1715

Please review the attached RBCA Evaluation for the subject site and let me know of your comments/suggestions. I have listed my comments below. In addition, it appears that there are several items missing from this report which I have also listed below. Before requesting these items from the RP, I wanted to get your comments, so they can be incorporate in one letter. Thanks. Amy

Background

Attached are some old reports for background information. In a nutshell, a waste oil tank was removed. Three wells were installed. Monitoring well MW-3 located adjacent to and downgradient of the former tank has had TPH-G, TPH-D, BTEX, and various 8010 constituents. Free-product has been intermittently detected in MW-3 as well. Recently, four more borings (PB-1 through PB-4) and a monitoring well (MW-4/PB-4) were installed at the site for further assessment. The results of this recent assessment is found in the EMCON report.

Comments

1. Construction worker scenario was not evaluated. This property and adjacent properties are well established commercial lots/businesses. To my knowledge, there is currently no construction planned in this area. I agree with the pathways they evaluated.
2. There has been free-product intermittently detected in monitoring well MW-3. Contrary to the report conclusion, it appears that the free product originated from the former waste oil tank, and is not hydraulic oil.
3. Where did they get all the RBSLs for the listed HVOCs in Table 1. Do we need a reference?
4. Is it even appropriate to complete a RBCA evaluation and ask for closure when free product is intermittently detected at MW-3? We discussed this before and you questioned their rationale? Maybe it would be best if they evaluated the site against the RWQCB Interim Guidelines and proposed to remediate/remove the free product before requesting closure. What do you think?
5. Monitoring well MW-4 seems to be screened inappropriately for HVOCs. Do you agree?

Missing

- Missing analytical results for:
- free product analysis
  - groundwater samples for MW-3 and MW-4
  - HVOC results for the soil sample collected from PB-1

Attachments (3)

- "Expanded Assessment and RBCA Evaluation" EMCON, March 4, 1997
- "Groundwater Monitoring and Sampling Report" Touchstone, April 8, 1996
- "Initial Subsurface Investigation for Waste Oil UST" Touchstone, November 1, 1994

Amy,

1. They have mentioned that they did not evaluate soil / groundwater to indoor area because based on the current scenario, there are no structures. But however, what about the future scenario? If they want to completely overlook the future scenario, they need to do a risk management plan.
2. The concentration in MW-3 does not show a decrease? So what is the guarantee
3. Collected TOC from the hot spot
4. MW-4 Too far from MW-3 and no groundwater or soil sample collected from PB-2.
5. Maybe we should look for MTBE, since high concentrations of BTEX was found.
6. Equations used in RBCA are not valid for concentrations above saturation.

Madhulla



**TABLE C**  
**HISTORICAL GROUNDWATER ANALYTICAL SUMMARY**

Goodyear Service Center  
3430 Castro Valley Boulevard - Castro Valley, California  
Results in ug/L - parts per billion (ppb)

Well ID	DTW	DATE	Year	Quarter	TPH - Gasoline	Benzene	Toluene	Ethyl-benzene	Xylenes	TPH - Diesel	TOG	8010	8270	Cadmium (ppm)	Chromium (ppm)	Lead (ppm)	Nickel (ppm)	Zinc (ppm)
MW-1	4.43	24-Apr-95	95	2nd	ND	ND	ND	ND	ND	ND	ND	CAR	ND	ND	0.052	0.0056	0.060	0.13
MW-1	5.91	2-Aug-95	95	3rd	ND	ND	ND	ND	ND	ND	ND	CAR	ND	ND	0.16	ND	0.160	0.22
MW-1	6.40	23-Oct-95	95	4th	ND	ND	ND	ND	ND	ND	NA	CAR	ND	NA	NA	NA	NA	NA
MW-1	3.93	9-Feb-96	96	1st	ND	ND	ND	ND	ND	ND	NA	CAR	ND	NA	NA	NA	NA	NA
MW-2	4.38	24-Apr-95	95	2nd	ND	ND	ND	ND	ND	ND	ND	CAR	ND	ND	0.054	0.0075	0.067	0.12
MW-2	5.04	2-Aug-95	95	3rd	ND	ND	ND	ND	ND	ND	ND	CAR	ND	ND	0.062	ND	0.082	0.11
MW-2	6.02	23-Oct-95	95	4th	ND	ND	ND	ND	ND	NA	NA	CAR	ND	NA	NA	NA	NA	NA
MW-2	3.62	9-Feb-96	96	1st	ND	ND	ND	ND	ND	NA	NA	CAR	ND	NA	NA	NA	NA	NA
MW-3	4.91	24-Apr-95	95	2nd	53	12	0.84	0.69	2.4	960	ND	CAR	ND	ND	0.029	0.0071	0.075	0.084
MW-3	FP	2-Aug-95	95	3rd	FP	FP	FP	FP	FP	FP	FP	FP	FP	FP	FP	FP	FP	FP
MW-3	FP	23-Oct-95	95	4th	FP	FP	FP	FP	FP	FP	FP	FP	FP	FP	FP	FP	FP	FP
MW-3	4.16	9-Feb-96	96	1st	52	9.6	1.4	1.2	2.0	700	NA	CAR	ND	NA	NA	NA	NA	NA

Apr. 196 FP →

	8010	MW-1	MW-2	MW-3	MCLs
Chloroform		2.4	3.2	ND	
1,1-DCA		ND	ND	10	5.0
Cis-1,2-DCE				3.5	6.0
PCE				0.77	5.0
1,1,1-TCA				1.1	200
TCE				0.73	5.0
Vinyl chloride				8.5	0.5

m. Logan →

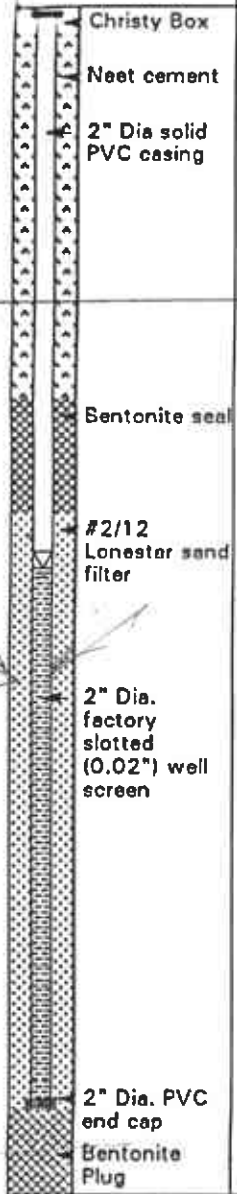
NA = Analysis not requested by Alameda County  
ND = Not Detected at or above the laboratory detection limits.  
CAR = See analytical laboratory reports for results.  
FP = No analytical data available due to the presence of separate-phase floating product.

FP 8010 & 8270'S

ask Don to inspect  
leaker lines - CV Sanitary District can identify  
Can analyze product. -

WELL  
DETAIL

EQUIPMENT: 8.5" Hollow Auger  
 LOGGED BY: MWS START: 9-28-94  
 DRILLER: Gregg FINISH: 9-28-94



Sample Number	DEPTH (feet)	SAMPLE
	0	CONCRETE
	0	BASEROCK (GW)
	2	BLACK-DARK GRAY-BROWN SILTY CLAY(CH) damp-moist, soft, noticeable hydrocarbon odor
	4	GRAY SILTY SAND WITH CLAY(SM) wet, strong hydrocarbon odor
3-1-1	6	OLIVE BROWN SILTY CLAY(CL-CH) with weathered rock fragments and sand, manganese staining and orange mottling, damp-moist, no hydrocarbon odor
	8	MOTTLED GRAY-BROWN SILTY CLAY(CL-CH) damp, stiff, <del>no hydrocarbon odor</del>
ATD 3-2-2	10	BROWN SILTY CLAY(CL) with gray mottling and sand, moist-damp, free water in fractures and sandy, <del>strong hydrocarbon odor</del>
	12	becoming more orange-brown, less gray mottling
3-3-3	14	BROWN CLAYEY SAND(SC) TO SILTY SAND(SM) wet, no hydrocarbon odor
	16	some gravels, no hydrocarbon odor
	18	
	20	DARK-MEDIUM BROWN SILTY CLAY(CL) very stiff, no hydrocarbon odor

BOTTOM OF BORING MW-3 @ 21 FEET

*DTW Related?*  
*FP when drilled*  
*prop gas*  
*strips filter*

**LEGEND**  
 ■ Retained Samples  
 ☒ Record Samples  
 ND = Not Detected  
 NA = Not Analyzed



Job No: 94-14  
 CEG:  
 Lic No: 1014  
 Drwn: CD  
 Date: OCT 1994

Log of Boring MW-3 and Well Construction Details  
 3420 CASTRO VALLEY BLVD.

PLATE  
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