### **HEALTH CARE SERVICES**

AGENCY

DAVID J. KEARS, Agency Director



RO#635

**ENVIRONMENTAL HEALTH SERVICES** 

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

October 23,1997 StID # 3818

Ms. Andee Gerace-Coles Bank of America 4000 MacArthur Blvd., Ste. 100 Newport Beach, CA 92660

Re: Closure of Monitoring Wells at former Cobbledick Kibbe Site, 500 High St., Oakland CA 94601

Dear Ms. Gerace-Coles:

This letter serves to inform you than our office has received Regional Water Quality Control Board (RWQCB) concurrence for site closure in regards to the underground fuel leak from the 10,000 diesel/gasoline and 2,000 gasoline tank at the above referenced site. Therefore, our office requests the proper closure of the five monitoring wells at this site.

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

Sincerely,

Barney M. Chan

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Hazardous Materials Specialist

c: B. Chan, files
 welc1500

## **HEALTH CARE SERVICES**

AGENCY



DAVID J. KEARS, Agency Director

RO#635

July 1, 1997 StID #3818

Mr. Mark Detterman Blymyer Engineers, Inc. 1829 Clement Ave. Alameda CA 94501-1395 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Re: Former Cobbledick-Kibbe Site, 500 High St., Oakland CA 94601

Dear Mr. Detterman:

As you are aware, our office is in the process of preparing a site and case closure summary for the above referenced site. During our review of the history of this site certain information was either insufficient or lacking. Please provide the following information or documentation so we may proceed with site closure:

- \* Please provide a current phone number for Ms. Andee Gerace-Coles.
- \* Our office was going to list all former responsible parties including Mr. Cobbledick and Security Pacific. Please comment and justify any objections to this.
- \* A certain amount of water was removed during the initial tank removals which was pumped out and disposed by H & H Shipping. Please provide documentation for this action.
- \* Approximately 150 cy of affected soil was excavated and disposed during the oil-water separator removal. Please provide copies of the receipt for this soil disposal.

Please respond to the above items, so I may proceed with the closure process.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

c: B. Chan, files

Ms. A.Gerace-Coles, Bank of America, 400 MacArthur Blvd., Ste 100, Newport Beach, CA 92660

info500

### **HEALTH CARE SERVICES**

AGENCY



DAVID J. KEARS, Agency Director

Ro#635

February 20. 1997

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION (LOP)
1131 Harbor Bay Parkway Suita 250

1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

(510) 567-6700 FAX (510) 337-9335

STID # 3818

Mr. Mark Detterman
Blymer Engineers, Inc
1829 Clement Avenue
Alameda, CA - 94501-1395

Ref: Former Cobbledick-Kibbe Site - 500 High Street, Oakland, CA

Dear Mr. Detterman:

I am in receipt of a workplan for a risk assessement, dated October 7, 1996 prepared by Blymer Engineers for the above referenced site. This workplan has been reviewed by this Department and is acceptable with the following changes:

- 1. The halogenated volatiles and benzene identified in monitoring well, MW-7 should be included in the risk assessment for the residential scenario.
- 2. The average groundwater concentrations from each of the pertinent wells (MW-5, MW-7 and MW-8 for residential scenario) for the last four quarters should be averaged again to get the final concentrations that will be used to calculate the risk.
- 3. All the residual VOC's found in soil samples, AS-1, AS-5 and AS-6 should be included in the risk assessment.
- 4. The workplan proposes to consider child residents and utility/construction workers as the most sensitive receptors. However, in a future scenario, the site could be developed for commercial purposes (other than storage) wherein there could be employees working for an average of eight hours. Hence this exposure scenario should be evaluated or justified by other alternate means.
- 5. The California Environmental Protection Agency's cancer potency factor for Benzene (0.1 kg-day/mg) should used instead of the Federal EPA's potency factor.

If you have any questions, you can reach us at (510) 567-6764.

Sincerely,

Madhulla Logan

Hazardous Material Specialist

fainey Chan

Barney Chan

Hazardous Material Specialist

C: Bank of America, Environmental Services #24122, 4000 MacArthur Boulevard, Suite 100, Newport Beach, CA - 92660



June 27, 1995 StID # 3818

HEALTH CARE SERVICES

ALAMEDA COUNTY

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

Ms. Andee Gerace-Coles Bank of America Environmental Services 555 Anton Blvd. Suite 1025 Costa Mesa, CA 92626

Re: Work Plan Approval for Installation of MW-8 for 500 High St. Oakland CA 94601

Dear Ms. Gerace-Coles:

Our office has received and reviewed Blymyer Engineer's June 21, 1995 work plan for the installation of one additional off-site monitoring well located between existing monitoring wells MW-5 and MW-7 (on Mr. Minor's property). This well will be designated MW-8. Consistent with the conclusions derived from the joint March 27, 1995 meeting, this well installation is approved and should proceed at your consultant's earliest convenience. As you are aware, the analytical results from this well will be used as part of the baseline risk assessment to estimate the health risk to the residents in this area.

Please inform me at least 48 working hours prior to well installation so I may arrange to be present if possible.

Recall also that a work plan for further subsurface investigation on Mr. Minor's property, 4341 Howard St., has also been approved. Although it would be ideal to perform both investigations at the same time, as a matter of expediency, each investigation should proceed as soon as possible.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

- cc: M. Detterman, Blymyer Engineers, 1829 Clement Ave., Alameda CA 94501-1395
  - S. Arigala, RWQCB
  - T. Fortner, Artesian Environmental, 3175 Kerner Blvd., Suite E, San Rafael, CA 94901
  - J. Minor, 1925 Alameda, P.O. Box 726, Diablo, CA 94528
  - J. Makishima, files

MWwp500

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

October 25, 1994 StID # 3818

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 HARBOR BAY PARKWAY, 2ND FLOOR
ALAMEDA, CA. 94502-6577

Ms. Andee Gerace-Coles Bank of America Environmental Services #4122 555 Anton Boulevard # 1025 Costa Mesa, CA 92626

Re: Request for Further Investigation for 500 High St., Oakland 94601, former Cobbledick-Kibbe Site.

Dear Ms. Gerace-Coles:

Our office has received and reviewed the 9/21/94 Quarterly Groundwater Sampling Report for the above site. I have also discussed this site with Mr. Mark Detterman of Blymyer Engineers. It was agreed that it is appropriate at this time to request additional information/actions.

Recall, this site was considering using the Alternative Points of Compliance remedial approach. This approach has recently been added to the SF Basin Plan Amendments and is now being called Non-Attainment Areas (NAA). This policy recognizes that in some sites where the contaminant plume is localized, slow-moving and prone to natural biodegradation and where the conventional remedial approaches are shown to be not applicable, groundwater monitoring and proper site management may be the best remedial approach. In order to use this approach the NAA policy states that this site must fulfill the following requirements: a. be fully characterized, b. the responsible party has demonstrated that no significant pollutant migration will occur, c. adequate source removal and/or isolation has been performed, d. plume cleanup is not cost-effective due to limited water quality, environmental and human health risk and e. an acceptable plan is submitted and implemented for containing and managing the remaining risks.

In order to satisfy these requirements, our office requests the following:

1. Please acknowledge the existing wells or propose the locations of those well(s) to be used as the compliance wells. Mr. Detterman stated that the wells installed on the Intel Container site might be used to verify the limits of the contaminant plume. Should this be the case, groundwater monitoring should coincide with that at the Intel site.

Ms. A. Gerace-Coles StID 3818 500 High St., Cobbledick-Kibbe Site October 25, 1994 Page 2.

- 2. Based on the concentration of chlorinated compounds being detected offsite, a site specific risk assessment is requested to determine the risk potential to human health. All potential exposure pathways and receptors must be examined. Of particular concern are the two residential homes on Howard St. Should the calculated risk exceed the generally acceptable risks, a corrective action plan must follow.
- 3. All potentially impacted parties must be notified of the groundwater contamination beneath their site. Groundwater use should not be allowed within the affected area.

Please provide a written response to the above items plus your risk assessment within 60 days or by December 27, 1994.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

cc: M. Detterman, Blymyer Engineers, Inc., 1829 Clement Ave., Alameda, CA 94501-2594

E. Howell, files

NAA500Hi

DAVID J. KEARS, Agency Director



R0635

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

December 10, 1993 StID # 3818

Ms. Andee Gerace-Coles Bank of America Environmental Services 555 Anton Blvd. Suite 1025 Costa Mesa, CA 92626

Re: Comment on Work Plans for Soil and Groundwater Sampling at Dailey Truck Body Property and on High St. Adjacent to 500 High St., Oakland CA 94601

Dear Ms. Gerace-Coles:

Our office has received and discussed with your consultant, Blymyer Engineers, the contents of their work plan for the sampling of soil and groundwater at the above referenced locations. Recall, this investigation will attempt to define the limits of the chlorinated solvent and petroleum hydrocarbon release which has occurred at 500 High St., the former Cobbledick-Kibbe site. Four borings will be advanced on the Dailey Truck Body site by Artesian Environmental. Soil and groundwater samples will sampled and analyzed from these borings. Additionally, a groundwater sampling will be taken from the existing well on Dailey Truck Body for chemical analysis.

Blymyer will independently, advance two borings along High St., on and near 500 High, which will attempt to define the limits of the groundwater contaminant plume. Our office concurrs with the above work plans with the following conditions:

- 1. When the well on the Dailey Truck Body site is sampled, you should take a water elevation reading on this well along with water level readings on the six existing wells connected with the 500 High St. site. Please insure that these water elevation readings are determined against the same datum point. A gradient map should be included in your report.
- 2. Please provide a map indicating the locations of the borings to be advanced on 500 High St.
- 3. Please contact our office at least 2 working days in advance of your field activities, so I may arrange to witness these activities if possible.

Ms. Gerace-Coles StID # 3818 500 High St. December 10, 1993 Page 2.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

cc: R. Khu, Blymyer Engineers, 1829 Clement Ave., Alameda 94501

S. Braff, Gutierrez & Associates, 930 Montgomery St., Penthouse, San Francisco, CA 94133

D. Taylor, Artesian Environmental Consultants, 3175 Kerner Blvd., Suite E, San Rafael, CA 94901

J. Minor, 1925 Alameda, P. O. Box 726, Diablo, CA 94528

E. Howell, files

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DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

November 16, 1993 StID #3818

Ms. Sharman Braff Gutierrez and Associates 930 Montgomery St., Penthouse San Francisco, CA 94133

Re: Request for Conditions of Indemnification Letter and Deed Restriction for 500 High St., Oakland CA 94601

Dear Ms. Braff:

Our office has received your November 5, 1993 letter requesting clarification of the contents of an indemnification letter and deed restriction for the above site. Recall, our office outlined a number of options which would be acceptable in resolving the chemical contamination apparently originating from the above referenced site. One option included an indemnification letter and deed restriction. As stated previously, our office has no formal wording for these documents, rather their contents need to convey the following commitments:

- 1. Bank of America, the current property owner, will retain responsibility for all contamination which is shown to have originated from the 500 High St. site. Such contamination must be remediated to the satisfaction of our office and that of the Regional Water Quality Control Board (RWQCB). Of course, any affected party may choose to add their own stipulation as to the type of investigation and remediation they'd like, however, the minimum requirements will be stated by our office or that of the RWQCB.
- 2. A deed restriction would note that future use of the affected site may be limited or not allowed. At this time all known soil contamination has been removed at this site, therefore, no deed restriction is necessary.

Please note, a human risk assessment is done to determine the future potential risk posed by residual chemical contamination left at this site as well as determine health based clean-up standards. This document is independent of the indemnification and deed restriction requirements.

Our office has also been made aware that another groundwater sampling event occurred in September this year. Please submit a copy of this report to our office within 10 days of receipt of this letter. Groundwater monitoring should continue on a quarterly basis.

Ms. Sharman Braff StID # 3818 500 High St. November 16, 1993 Page 2.

We are aware that arrangements have been made for additional subsurface investigations on Mr. Minor's property. Any future work plans for additional subsurface investigation in regards to this site should be sent to our office for our review.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan,

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Hazardous Materials Specialist

CC: A. Gerace-Coles, Bank of America Environmental Services, 555 Anton Blvd., Suite 1025, Costa Mesa, CA 92626

R. Khu, Blymyer Engineers, 1829 Clement Ave., Alameda 94501

E. Howell, files

5-500High

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Saptembers, Agency Diggtor StID # 3818

Ms. Andee Gerace-Coles Bank of America Environmental Services 555 Anton Blvd. Suite 1025 Costa Mesa, CA 92626 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

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

Re: Options for Subsurface Investigation at 500 High St., Oakland CA, 94601, former Cobbledick-Kibbe.

Dear Ms. Gerace-Coles:

This letter serves to recount our September 21, 1993 conversation regarding the options allowed for the above site. Recall, the major concern of our office are the concentrations of chlorinated solvents being detected in the off-site wells, MW-5 and MW-6, some of which are above the California MCL. This assumes that sufficent groundwater sampling has been done to confirm that the diesel and gasoline release is not also an issue. I noted that a criteria for accepting a risk assessment would be defining the extent of the groundwater contaminant plume. You stated that there has been opposition in allowing monitoring well installation on the adjacent property by the current owner. stated that, you could make a formal written request to the property owner and copy our office. We have the means to request an independent investigation from the adjacent property owner if they refuse you site access. I noted that a monitoring well exists on the High St. side of the container company next to Daly This is a potential downgradient well which can be used to determine the limits of the solvent plume. Any future correspondence should identify which option you are choosing to determine the extent of the plume.

In regards to the acceptance of a risk assessment, it may be possible to propose clean-up levels exceeding the MCL if is acknowledged by the RWQCB that groundwater in this area is not potable and will not likely be used. Groundwater analysis for Total Dissolved Solids, conductivity and pump rates may be used to support the claim that the water is non-potable. Enclosed, please find two documents describing typical contents of a risk assessment and a list of fate and transport models. Note that this document is a draft and is open to changes. You may contact me at (510) 271-4530 if you have any questions.

Sincerely, Barrey M Cla\_

Barney M. Chan, Hazardous Materials Specialist enclosure

cc: R. Khu, Blymyer Engineers, 1829 Clement Ave., Alameda 94501

E. Howell, file 4-500High

July 26, 1993

StID # 3818

DAVID J. KEARS, Agency Director

R0635

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

Ms. Andee Gerace-Coles
Bank of America Environmental Services
555 Anton Blvd Suite 1025

555 Anton Blvd. Suite 1025 Costa Mesa, CA 92626

Re: Comment on Phase I Subsurface Investigation for Former Cobbledick-Kibbe Site, 500 High St., Oakland CA 94601

Dear Ms. Gerace-Coles:

Our office has received and reviewed the March 23, 1993 report referenced above as prepared by your consultant, Blymyer Engineers, Inc. We have also spoken with Mr. Ramon Khu from Blymyer. He requested, on your behalf, our office's opinion of the requirements for this site for the potential sales or recommendation for site closure. This letter will serve to give comment on the results of the on-going investigation at this site and also give you various options for estimating future liabilities and responsibility.

As you are aware, there appears to have been at least two sources of contamination releases from this site; one being the former gasoline and diesel tanks and the other, the former oil-grease separator sump. The soil contamination surrounding the former fuel tanks appears to have been removed to low concentrations. During the installation of monitoring well, MW-4, soil contamination was noticed in the boring from this well. Eventually, this well was closed and destroyed, since it had apparently been impacted by the oil-grease sump which was nearby Overexcavation of the sump area apparently removed all petroleum hydrocarbon contamination from within this area. Unfortunately, two off-site wells, MW-5 and MW-6 found levels of various chlorinated compounds some exceeding their MCL (California Maximum Contaminant Level). Since you are interested in selling this site, with or without site closure recommendation from the Regional Water Quality Control Board (RWQCB), we would like to state your requirements and options.

You must continue to monitor all wells on a quarterly basis for all parameters initially requested or previously analyzed. You may request to modify the monitoring schedule when you have demonstrated that a specific parameter has not been detected for four quarters of monitoring, however, groundwater elevation measurements should continue to verify groundwater gradient.

Ms. A. Gerace-Coles StID #3818 500 High St.-former Cobbledick Kibbe July 26, 1993 Page 2.

The extent of the halogenated groundwater plume must be determined. It therefore appears that an additional downgradient well(s) must be installed. Once the extent of this plume is determined, you may request for site closure if concentrations of the petroleum and halogenated compounds are non-detectable or less that their respective MCLs for four consecutive quarters. If this is not realistic, you may choose to consider some type of active remediation ie groundwater extraction to accelerate the decline of contaminants. You may also choose to establish health based clean-up standards via a risk assessment. This assumes that the health based risk assessment clean-up goals are at least as stringent as those goals which are protective of the groundwater. It may be necessary to verify that the quality of the "groundwater" being sampled from the wells is not actually drinkable by running total dissolved solids, conductivity or performing a pump test. If the established goals are met, you may request site closure after a trend in groundwater concentration has been shown. You will also be required to include a deed notice for this property and submit an indemnification letter to our office and that of the RWQCB.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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cc: G. Jensen, Alameda County District Attorney Office

R. Khu, Blymyer Engineers, 1829 Clement Ave., Alameda 94501

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DAVID J. KEARS, Agency Director



R0635

ERTIFIED: P062 128358

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

January 2, 1991

Mr. Herb Elliott, President Cobbledick-Kibbe, Inc. Adminstratrative Offices 1001 Marina Village Parkway Alameda, CA 94501

#### NOTICE OF VIOLATION

Re: Request for Workplan for Cobbledick-Kibbe, 500 High St. Oakland CA 94601

Dear Mr. Elliott:

You were initially informed in a letter from our agency dated April 12, 1990 that, due to the amounts of hydrocarbon contamination found in the soil and groundwater samples taken subsequent to the underground tank removals at the the above address, a workplan was to be submitted which addresses the assessment of contamination and any possible remediation required to protect the waters of the State. In this letter was an extensive list of items of concern to be included in the workplan. To this date, we have not received this information.

Please note that the 1,700ppm and 580 ppm of Total Petroleum Hydrocarbon found in the soils from the ends of the 2000 gallon gasoline tank and the Total Petroleum Hydrocarbons and BTEX found in the water samples from both the 2,000 and 10,000 gallon fuel pits (18,17 ppm TPH, 1500,1700 ppb benzene, 1200,1900 ppb toluene,150,3.4 ppb ethyl benzene and 3500,3200 ppb xylenes) warrant a soil and ground water investigation. This investigation is recommended by the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, August 10, 1990 version.

You should be aware that section 25299.37(a) of Division 20 Chapter 6.7 of the Health and Safety Code states that each owner, operator or other responsible party shall take corrective actions in response to an unauthorized release in compliance with this section and that section 25299.37(c) states that the local agency may issue an order to the owner requiring compliance with this section. 25298(c)(4) states that no person shall close an underground tank unless he demonstrates to the appropriate agency that the site has been investigated to determine if there are any present, or were past releases, and if so, that appropriate corrective remedial actions have been taken.

Mr. Herb Elliott Cobbledick-Kibbe, Inc. January 2, 1991 Page 2

If appropriate remedial actions are not taken this can be considered improper closure of an underground tank and any underground tank owner is liable for a civil penalty of not less than five hundred or more than five thousand dollars per day of each violation. You are therefore requested to submit a workplan within 30 days of the date of this letter. You are reminded to also send copies of all proposals, workplans and reports to Mr. Lester Feldman of the San Francisco Regional Water Quality Control Board.

Please contact the undersigned at 271-4320 should you have any questions regarding this letter.

Sincerely,

Barney William Barney M. Chan

Hazardous Materials Specialist

cc: Gil Jensen, Alameda District Attorney Office, Cosumer and Environmental Protection Division

Lester Feldman, SFRWQCB

H. Hatayama, DOHS

Edgar Howell, Chief Hazardous Materials Division

DEPARTMENT OF ENVIRONMENTAL HEALTH



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

August 20, 1990

Ms. Elizabeth Liu EOA, Inc. 1410 Jackson Street Oakland, CA 94612

Dear Ms. Liu:

Below are the five addresses you requested a file search on and the information we have:

(R0635) 500 High Street: No file (Cobbledick-Kibbe)

4541 Oakport: No file

4417 Oakport, Ameron: Aboveground storage, no record of spills

(R0886) 4801 Oakport, PG&E: One 12,000 gallon unleaded fuel underground tank, a 10,000 gallon diesel underground tank, and a 1,000 gallon waste storage underground tank.

4445 Jenson Street, Utility Vault: Aboveground storage

We have no record of spills, unauthorized releases, or emergency responses.

Attached is an invoice for the site search. If you have any questions, please call the undersigned at 415/271-4320.

Sincerely,

Cynthia Chapman

Cynthia Chapma

Hazardous Materials Specialist



April 12, 1990

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

Mr. Herb Elliott, President Cobbledick-Kibbe, Inc. Administrative Offices 1001 Marina Village Parkway Alameda, CA 94501

Subject: Unauthorized Release

Removal of Underground Tanks and Associated Piping

Cobbledick-Kibbe, Inc.

500 High Street Oakland, CA 94601

Dear Mr. Elliott:

Mr. Dermot Casey of Accutite has informed our office of the results for analysis of subsurface soil and water samples taken in response to the underground tank removals from the above shown facility. Because of the degree of contamination found, this facility is considered to have experienced a confirmed release of petroleum hydrocarbons that has impacted subsurface soil and ground water. The extent of this contamination must be assessed and remediated.

Our office will be the lead agency overseeing both the soil and groundwater remediation of this site. The Regional Water Quality Control Board (RWQCB) is currently unable to oversee the large number of contamination cases within Alameda County and has delegated the handling of this case to our Division. We will be in contact with the RWQCB in order to provide you with guidance concerning the RWQCB's remediation requirements. However, please be aware that you are responsible for diligent actions to protect waters of the State.

To complete contaminant assessment and begin any possible remediation, we require that you submit a work plan which, at a minimum, addresses the items listed below and presents a timetable for their completion. Please submit this workplan within 30 days of the date of this letter.

Cobbledick-Kibbe April 12, 1990 Page 2

#### I. Introduction

A. Statement of scope of work

B. Site map showing location of existing and past underground storage tanks and associated piping

C. Site History - provide historical site use and ownership information. Include a description of types and locations of hazardous materials used on site.

### II. Site Description

- A. Vicinity description including hydrogeologic setting
- B. Initial soil contamination and excavation results
  - provide sampling procedures used
  - indicate depth to ground water
  - describe soil strata encountered
  - provide soil sampling results, chain of custody forms, identity of sampler
  - describe methods for storing and disposal of all soils

## III. Plan for determining extent of soil contamination on site

- A. Describe approach to determine extent of lateral and vertical contamination
  - identify subcontractors, if any
  - identify methods or techniques used for analysis
  - provide sampling map showing all lines of excavation and sampling points
  - if a step out procedure is used, define action level for determination of "clean" isopleth
  - provide chain of custody forms, lab analysis results, all receipts and manifests, & identity of sampler
- B. Describe method and criteria for screening clean versus contaminated soil. If onsite soil aeration/bioremediation is to be utilized, then provide a complete description of method that includes:
  - volume and rate of aeration/turning
  - method of containment and cover
  - wet weather contingency plans
  - permits obtained
- C. Describe security measures

Cobbledick-Kibbe April 12,1990 Page 3

### IV. Plan for determining ground water contamination

- Construction and placement of wells should adhere to the requirements of the "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks". Provide a description of placement and rationale for the location of monitoring wells including a map to scale.
- The placement and number of wells must be able to determine the extent and magnitude of the free product and dissolved product plumes.
- A. Drilling method for construction of monitoring wells
  - expected depth and diameter of monitoring wells

date of expected drilling

 casing type, diameter, screen interval, and pack and slot sizing techniques

- depth and type of seal

- development method and criteria for adequacy of development
- plans for cuttings and development water
- B. Ground water sampling plan
  - method for free product measurement, observation of sheen
  - well purging procedures
  - sample collection procedures
  - chain of custody procedures
  - procedures for determining ground water gradient
- C. Sampling schedule
  - measure free product weekly for first month following well installation
  - measure free product and dissolved constituents monthly for first three months.
  - after first three months monitor quarterly.
  - monitoring must occur a minimum of one year.
- V. Provide a site safety plan

Cobbledick-Kibbe April 12, 1990 Page 4

### VI Development of a Remediation Plan.

- A. The Remediation Plan is to include a time schedule for remediation, and, at minimum, must address the following issues:
  - removal of all free product. Manual bailing is not acceptable as a recovery system. Actual amount of free product removed must be monitored and tabulated.
  - remediation of contaminated soils and dissolved constituents must follow RWQCB's resolution No. 68-16.
  - soils containing 1,000+ ppm of hydrocarbons must be remediated. Soils containing between 100 and 1,000 ppm must be remediated unless sufficient evidence is provided which indicates no adverse effects on groundwater will occur. Clean up of soils to 100 ppm is strongly recommended.
  - design of remedial action system should be based on a review of hydrogeologic and water quality data and on an evaluation of mitigation alternatives. The determination of probable capture zone(s) of extraction system(s) should be based on aquifer characteristics as determined by aquifer test data

#### VII Reporting

- A. Technical reports should be submitted with a cover letter from Cobbledick-Kibbe. The letter must be signed by an authorized representative.
- B. Monthly reports must be submitted for the next three months with the first report due 90 days from the above letter date.
- C. Quarterly reports must be submitted with the first report due 90 days after the final monthly report. These reports should describe the status of the investigation and cleanup.
- D. All reports and proposals must be signed by a California-Certified Engineering Geologist, California Registered Geologist or a California-Registered Civil Engineer (see page 2, 2 June 1988 RWQCB document). A statement of qualifications should be included in

Cobbledick-Kibbe April 12, 1990 Page 5

all reports. Initial tank removal and soil sampling does not require such expertise; however, borehole and monitoring well installation and logging, and impact assessments do require such a professional.

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and RWQCB. You should be aware that this Division is working in conjunction with the RWQCB and that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of agreed upon time deadlines must be confirmed in writing by either this Division of the RWQCB.

Should you have any questions concerning the contents of this letter or the status of this case please contact Barney Chan, Hazardous Materials Specialist at 271-4320.

Sincerely,

Edgar B. Howell III

Edgar BHO wello

Chief, Hazardous Materials Division

cc: Gil Jensen, Alameda County District Attorney, Consumer & Environmental Protection
Rafat Shahid, Assistant Agency Director
Lester Feldman, SFRWQCB
Howard Hatayama, DOHS
Fire Marshall Blueford, OFD
Mr. Dermot Casey, Accutite