

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#643
RAFAT A. SHAHID, DIRECTOR

March 5, 1996

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

Mr. Wesley Adams
City of Alameda
2263 Santa Clara Ave.
Alameda, CA 94501-4455

STID 3837

Re: Potential human health threat at 2263 Santa Clara Ave., Alameda, California

Dear Mr. Adams,

Based on information recently made available to this office, it appears that the residual concentrations of benzene identified in former tank pit T-1, adjacent to the actively used garage building, may potentially pose a threat to human health through the intrusion of vapors into the building. Per Tier 1 of the American Society for Testing and Materials' Risk-Based Corrective Action (ASTM RBCA) guidelines, the human health protective threshold level for potential soil vapor intrusion into buildings in a commercial/residential scenario is 0.005 parts per million (ppm) for a 10^{-6} risk and 0.49ppm for a 10^{-4} risk scenario. The remaining levels of benzene at the site, 0.63ppm, exceed both these given threshold values. Therefore, before closure can be considered for this site, this office needs more data assuring that the residual levels of benzene will not pose a threat to occupants of the on-site building. This can possibly be accomplished through various options which may include, but not be limited to, the following: 1) Inputting more site-specific data into the Tier 2 level of ASTM RBCA; 2) collecting real air/vapor data from the vadose zone beneath the building or possibly from within the existing building; or 3) inputting site-specific data into other established risk assessment equations.

Please submit this information to this office **within 60 days** of the date of this letter. If you have any questions or comments, please feel free to contact me at (510) 567-6763.

Sincerely,

Juliet Shin
Senior Hazardous Materials Specialist

cc: Misty Kaltreider
ACC Environmental Consultants
7977 Capwell Drive, Ste 100
Oakland, CA 94621

Acting Chief-File

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0643

RAFAT A. SHAHID, Director

Alameda County
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577

CC4586

July 25, 1995

Mr. Wesley Adams
City of Alameda
2263 Santa Clara Ave.
Alameda, CA 94501-4455

STID 3837

Re: Work plan for 2263 Santa Clara Ave., Alameda, CA

Dear Mr. Adams,

This office has reviewed ACC's work plan, dated May 1995, for the above site. All future work plans and reports need to include a signed cover letter from the City of Alameda acknowledging their review and concurrence with the report(s). The work plan is acceptable to this office with the following comments:

- o This office has insufficient information to confirm that former tank T-3 was in fact a heating oil tank. Based on the assumption that T-3 was a heating oil tank, tank pit soil samples were only analyzed for TPHd and BTEX at the time of the tank removal. Please submit additional information indicating that T-3 was used to store heating oil. If there is any indication that this tank was used to store waste oil, additional samples may need to be collected from this area and analyzed for all waste oil constituents.
- o If, after two quarters of monitoring, the groundwater gradient is determined to be flowing to the north/northeast, an additional well will be required within 10 feet north of former Tank T-1.

Field work should commence within 45 days of the date of this letter. A report documenting the work shall be submitted to this office within 45 days after completing field activities.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

A handwritten signature in cursive script, appearing to read "Juliet Shin".

Juliet Shin
Senior Hazardous Materials Specialist

Mr. Wesley Adams
Re: 2263 Santa Clara Ave.
July 25, 1995
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cc: Misty Kaltreider
ACC Environmental Consultants
1000 Atlantic Ave., Ste 110
Alameda, CA 94501

Acting Chief-File

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0643

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

June 29, 1995

Mr. Wesley Adams
City of Alameda
2263 Santa Clara Ave.
Alameda, CA 94501-4455

Alameda County CC4580
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577

STID 3837

Re: Required investigations at 2263 Santa Clara Ave., Alameda,
California

Dear Mr. Adams,

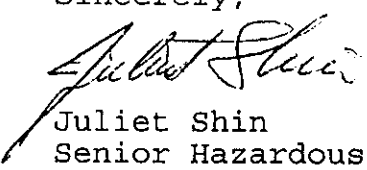
Three underground storage tanks (USTs), one 280-gallon unleaded gasoline UST (T-1), one 1,000-gallon leaded gasoline UST (T-2), and one 1,500-gallon heating oil UST (T-3), were removed from the site on June 15 and 17, 1994. Up to 4,700 parts per million (ppm) Total Petroleum Hydrocarbons as gasoline (TPHg) and 8.4ppm benzene was identified in soil samples collected from the tank pits.

On February 28, 1995, this office sent you a letter requiring you to prepare and submit a Preliminary Site Assessment (PSA) work plan addressing soil and groundwater investigations at the above site (refer to attached copy). This work plan was due to this office by April 25, 1995. On April 28, 1995, ACC Environmental Consultants submitted a letter to this office requesting a 45-day extension for the submittal of the work plan. This extension was verbally granted by this office and the work plan submittal date was extended to June 6, 1995.

To this date, this office has not received the required workplan. Per Article 11, Title 23 California Code of Regulations, you are required to submitted this work plan, addressing the concerns outlined in the February 28, 1995 letter. **This work plan is due to this office within 30 days of the date of this letter.** Any requests for extensions, or modifications of the required tasks, should be submitted in writing.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,


Juliet Shin

Senior Hazardous Materials Specialist

Mr. Wesley Adams
Re: 2263 Santa Clara Ave.
June 29, 1995
Page 2 of 2

ATTACHMENT

cc: Misty Kaltreider
ACC Environmental Consultants
1000 Atlantic Ave., Ste 110
Alameda, CA 94501

Acting Chief-File

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

R0643

February 28, 1995

Mr. Wesley Adams, Engineer
City of Alameda
2263 Santa Clara Ave.
Alameda, CA 94501-4455

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

STID 3837

Re: Required investigations at 2263 Santa Clara Ave., Alameda

Dear Mr. Adams,

This office has reviewed RGA Environmental's (RGA) Underground Storage Tank Removal Report, dated October 1994, for the above site. Three underground storage tanks (USTs), one 280-gallon unleaded gasoline tank (T-1), one 1,000-gallon leaded gasoline tank (T-2), and one 1,500-gallon heating oil tank (T-3), were removed from the site on June 15 and 17, 1994. Soil samples were collected from each of the tank pits and one "grab" ground water sample was collected from tank pit T-2. Analysis of the soil samples identified up to 4,700 parts per million (ppm) Total Petroleum Hydrocarbons as gasoline (TPHg) and 8.4 ppm benzene in the T-1 tank pit. Overexcavation of tank pit T-1 was subsequently conducted. Analysis of confirmatory soil samples collected from this excavation identified up to 100 ppm TPHg and 0.63 ppm benzene from the north sidewall.

Although it appears that the extent of soil contamination has roughly been defined and that the bulk of soil contamination was overexcavated from tank pit T-1, the initial soil contaminant concentrations identified in T-1 indicate that ground water may have been impacted at the site. Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that ground water investigations be conducted when there is evidence to indicate that a release from an UST may have impacted ground water.

You are required to conduct a **Preliminary Site Assessment (PSA)** to determine the lateral and vertical extent and severity of any potential ground water contamination resulting from the release at the site. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, and be consistent with requirements set forth in Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are

Mr. Wesley Adams
Re: 2263 Santa Clara Ave.
February 28, 1995
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summarized in the attached **Appendix A**. The major elements of the guidelines include, but are not limited to, the following:

- o At least one permanent ground water monitoring well must be installed within 10 feet of the observed soil contamination, oriented in the confirmed downgradient direction relative to groundwater flow. In the absence of neighboring monitoring wells located within 100 feet of the site, or any other data identifying the confirmed downgradient direction, a minimum of three wells will be required to verify gradient direction. Although two monitoring wells already exist at the site, adjacent to T-1 and T-2, these wells will only be acceptable for monitoring purposes if detailed well construction data for these wells are provided to and reviewed by this office and it is determined that these wells are screened and constructed properly for monitoring. Additionally, information must be provided on the current condition of these wells for our review.

During the installation of any wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology.

- o Subsequent to the installation of the monitoring wells, these wells must be **surveyed to an established benchmark**, (i.e., Mean Sea Level) with an accuracy of 0.01 foot. Ground water samples are to be collected and analyzed quarterly, and water level measurements are **to be collected monthly for the first six months**, and then quarterly thereafter. If the initial ground water elevation contours indicate that ground water flow directions vary greatly than you will be required to continue monthly water level measurements until the ground water gradient behavior is known. Both soil and ground water samples shall be analyzed for TPHg and BTEX.

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

Mr. Wesley Adams
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In order to properly conduct a site investigation, you are required to obtain professional services of a reputable environmental consultant. **All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.**

The PSA proposal is due within 60 days of the date of this letter. Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for final RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter.

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

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

Please be advised that this is a formal request for a work plan pursuant to **Section 2722 (c) (d) of Title 23 California Code of Regulations**. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

Additionally, please provide some clarification as to the fate of the contents for all three tanks.

Mr. Wesley Adams
Re: 2263 Santa Clara Ave.
February 28, 1995
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Lastly, please complete the attached Unauthorized Leak Report Form and submit it to this office within 30 days of the date of this letter.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,



Juliet Shin
Senior Hazardous Materials Specialist

ATTACHMENT

cc: Edgar Howell

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

Local Health Officer Agency Director



R0643

RAFAT A. SHAHID, Assistant Agency Director

December 28, 1993

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

CERTIFIED MAILER #: P 386 338 228

Public Works Department
2263 Santa Clara Ave.
Alameda, 94501
UGTID:3837

**Re: FIVE-YEAR PERMITS FOR OPERATION OF UNDERGROUND STORAGE TANK(S)
2263 Santa Clara Ave. Alameda, 94501**

Dear Owner/Operator:

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

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

Be advised that Title 23 of the California Code of Regulation prohibits the operation of "ANY" UST without a permit. If our records are in error, you must contact this office immediately TO AVOID POSSIBLE ENFORCEMENT ACTION. Please feel free to contact this office at (510) 271-4320; to answer any questions which may arise in completing the mandatory five-year permit process. Be prepared to provide your zip code to speak with the Hazmat Specialist handling your case.

Sincerely,

Cynthia Manji for LARRY SETO.

LARRY SETO
Sr HazMat Specialist

c: Edgar Howell, Chief, Hazardous Materials Div. (files)