

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0754

RAFAT A. SHAHID, Director

August 24, 1995
STID 3706

Greg Shepherd
Southern Pacific Transportation Co.
One Market Plaza
San Francisco CA 94105

DEPARTMENT OF ENVIRONMENTAL HEALTH
Environmental Protection Division
1131 Harbor Bay Parkway, #250
Alameda, CA 94502-6577
(510) 567-6700

RE: 721 Cedar St., Oakland CA 94607

Dear Mr. Shepherd,

Since my last letter to you, dated 5/27/94, the following documents have been received in this office:

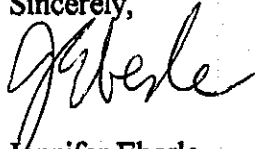
- 1) 8/1/94 fax from yourself (memo from DTSC re PRGs for Cypress Freeway Realignment project)
- 2) 9/14/94 fax from Industrial Compliance (IC) (analytical report for 9/21/94 samples)
- 3) 12/14/94 letter report from IC (analytical reports for 9/21/94 and 10/18/94 samples)
- 4) 2/2/95 letter report from IC (tabulated results and analytical reports for stockpile samples)
- 5) 8/2/95 "Second Quarter 1995, Ground Water Monitoring Report," by IC

The 8/2/95 IC report documents the first round of sampling in the three new wells. These wells were reportedly installed in March 1995. As per my conversations with IC staff, **I understand that the well installation report will be submitted shortly after the soil excavation and remediation is complete.** I also understand that this report will document the entire soil excavation and remediation process. I was present onsite today during what we hope will be the final stage of excavation and confirmatory soil sampling. The soil results from today will determine whether this is the final round.

This letter is being sent to update you on the reports thus submitted, and to further our communication on this project. If you have any questions, please contact me at 510-567-6761.

August 24, 1995
STID 3706
Greg Shepherd
page 2 of 2

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Richard Bateman, Industrial Compliance, 9719 Lincoln Village Dr., Suite 310,
Sacramento CA 95827
James Ackerman, Industrial Compliance, PO Box 24374, Oakland CA 94623-1374
Leroy Todd/file

je.3706-C

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0754

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 27, 1994
STID 3706

Greg Shepherd
Southern Pacific Transportation Co.
One Market Plaza
San Francisco CA 94105

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: 721 Cedar St., Oakland CA 94607

Dear Mr. Shepherd,

We are in receipt of the Revised Soil Remediation and Ground Water Investigation Workplan, dated 5/19/94. As you know, this workplan differs from the original workplan dated 12/27/93, in the following ways:

- 1) Total lead will be analyzed in soil sampled from the three boreholes at the capillary fringe, and
- 2) Soil containing less than 4.6 ppm benzene may be considered clean, or reused onsite.

These revisions have been discussed in detail. Therefore, the Revised Workplan is acceptable, on the condition that field work commence within two weeks of this letter. To ensure timeliness, this letter is being faxed both to yourself and to Jim Jensen of IC today. A hard copy will follow.

If you have any questions, please contact me at 510-271-4530.

Sincerely,

A handwritten signature in cursive script, appearing to read 'J. Eberle'.

Jennifer Eberle
Hazardous Materials Specialist

cc: Jim Jensen, Industrial Compliance, 9719 Lincoln Village
Dr., Suite 310, Sacramento CA 95827
Ed Howell/file

je 3706-B

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0754

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

April 28, 1994
STID 3706

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

Jim Jensen
Industrial Compliance
9719 Lincoln Village Dr., Suite 310
Sacramento CA 95827

RE: 721 Cedar St., Oakland CA 94607

Dear Mr. Jensen,

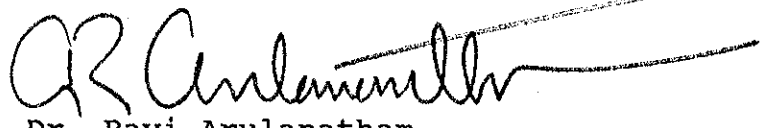
We are in receipt of your faxed letter dated 4/28/94. We are in agreement as to the use of 100 ppm for TPH and 4.6 ppm for benzene as soil cleanup and reuse objectives. The benzene concentration comes from the US EPA's Fourth Quarter 1993 Preliminary Remediation Goals (PRGs).

The excavation samples that you propose analyzing for total lead may not be used as background samples because they will be in the immediate UST vicinity. Our understanding was that the upgradient well/boring sample(s) may be used as background. Your proposal to analyze dissolved lead in all three wells during the first round of sampling is acceptable.

If you have any questions, please contact me at 510-271-4530.

Sincerely,


Jennifer Eberle
Hazardous Materials Specialist


Dr. Ravi Arulanatham
Staff Toxicologist

cc: Greg Shepherd, Southern Pacific Transportation Co., One
Market Plaza, San Francisco CA 94105
Ed Howell/file

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0754

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 10, 1994
STID 3706

Jim Jensen
Industrial Compliance
9719 Lincoln Village Dr., Suite 310
Sacramento CA 95827

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: 721 Cedar St., Oakland CA 94607

Dear Mr. Jensen,

We are in receipt of your letters dated 2/25/94 and 3/9/94. There appears to be a misunderstanding regarding the fourth Alameda County comment, on page 3 of the 2/25/94 letter. This comment reads "Alameda County requested that the benzene soil action level of 18 ppm be included in the cleanup criteria for the non-impacted soil stockpile on page 16-17 of the workplan." This comment is erroneous; note that the use of 18 ppm for benzene is part of IC's November 1992 Risk Assessment, the very use of which is in question. During a telephone conversation between us on 2/9/94, I asked what benzene concentration would be proposed as a cleanup goal for the assumed non-impacted soil stockpile (see pages 16-17 of the 12/27/93 IC workplan). This workplan proposed a TPH cleanup goal of 100 ppm, but omitted a benzene cleanup goal. Please note that the TPH concentration should be below 10 ppm for reuse onsite. With TPH below 10 ppm, benzene would likely be ND.

During subsequent telephone conversations, we set up a meeting for Monday, March 21, 1994 at 9:00 am in the offices of the Regional Water Quality Control Board located at 2101 Webster St., Suite 500. This meeting will include Southern Pacific representatives and Dr. Ravi Arulanatham, our staff toxicologist, who reviewed the November 1992 Risk Assessment for the 1912-7th St. site, prepared by IC. If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Greg Shepherd, Southern Pacific Transportation Co., One
Market Plaza, San Francisco CA 94105
Ed Howell/file

je

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0754

RAFAT A. SHAHID, Assistant Agency Director

June 18, 1992

STID 3706

Southern Pacific Trans. Co.
One Market Plaza, Rm 1007
San Francisco CA 94105
Attn: Greg Shepherd

RE: 721 Cedar St.
Oakland CA 94607

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

Dear Mr. Shepherd,

Jennifer Eberle of our office spoke with Mark Dockum and Walter Floyd of Industrial Compliance (IC) on June 15, 1992 regarding the above referenced site. IC explained that they proposed soil borings as the first step prior to deciding on a remediation method. One type of remediation may turn out to be overexcavation of affected soils. However, they want to gather more data on the lateral extent of soil contamination prior to the remediation decision. Likewise, IC wants to hold off on monitoring well placement/implementation until any possible soil overexcavation occurs. Any possible monitoring well destruction will be thus avoided. This discussion addresses comment #1 in Alameda County Hazardous Materials Division's (ACHMD) letter dated 6/3/92.

Therefore, the "Site Investigation Workplan" prepared by IC, dated 5/28/92, is approved. Comments #2 and #3 in ACHMD's letter dated 6/3/92 still need to be addressed, however. Please respond to these two comments within 45 days from the date of this letter, or by August 2, 1992.

If you have any questions, please contact J. Eberle at 510-271-4320.

Sincerely,

Susan Hugo
Senior Hazardous Materials Specialist

cc: Mark Dockum, Industrial Compliance, 9719 Lincoln Village Dr.,
Ste 310, Sacramento CA 95827
Rich Hiatt, RWQCB
File

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0754

RAFAT A. SHAHID, Assistant Agency Director

June 3, 1992

STID 3706

Southern Pacific Trans. Co.
One Market Plaza, Rm 1007
San Francisco CA 94105
Attn: Greg Shepherd

RE: 721 Cedar St.
Oakland CA 94607

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

Dear Mr. Shepherd,

We are in receipt of your Site Investigation Workplan for the above referenced site, prepared by Industrial Compliance (IC), dated 5/28/92, under cover letter from IC dated 5/28/92. There are a few comments I would like to make:

1) Page 1 of the cover letter states that "the lateral and vertical extent of hydrocarbon-impacted soil has already been assessed." However, page 3 of the report states "the lateral extent of impacted soil beneath the building has not yet been assessed." Indeed, this is the rationale for two proposed soil borings inside the building (see Fig. 2 and Section 3.0).

It has been demonstrated, however, that out of four soil borings, the soil contamination was confined to soil boring A-1 (with the exception of the very low concentration of 0.007 ppm in soil boring A-2). Page 2 of the cover letter states "it is therefore likely that the excavated soil was used to backfill the tank excavation. The soil was neither sampled nor stockpiled." It is likely that this backfilled soil is the source for the contamination found in monitoring well A-1. Further, page 2 of the "Phase II Investigation" report dated 12/19/91 states that soil beneath the tank indicated 5,000 ppm TPH-g and 220 ppm benzene. Page 11 of this report states that the size of the area affected with TPH-g in excess of 1,000 ppm is approximately 20 X 15 feet, and excavation of this soil would generate approximately 140 cubic yards.

Therefore, you are requested to proceed with the excavation of hydrocarbon-affected soil as per the "Phase II Investigation" OR provide another remedial option within 45 days from the date of this letter, or by July 18, 1992.

The lateral and vertical extent of groundwater contamination has not yet been addressed, as requested by letter dated 4/7/92. You are therefore requested to submit a proposal for additional monitoring well(s) in the verified downgradient direction in order to define the groundwater plume. We will expect this proposal within 45 days from the date of this letter, or by July 18, 1992.

Greg Shepherd
STID 3706
Page 2 of 3
June 3, 1992

2) Page 3 of the Workplan states that "the groundwater gradient has been assessed approximately 1700 feet west of the site, at the SPTCo wastewater impoundments, as being approximately north 20 degrees west." This infers that the groundwater gradient at 721 Cedar St. is also northwest. In order to verify the groundwater gradient, you must provide documentation for at least the past year of the groundwater gradient at the SP wastewater impoundments referred to on page 3 of the Workplan. We will expect this information **within 45 days** from the date of this letter, or by **July 18, 1992**.

3) Pages 1 and 2 of the cover letter state that "pumping and treating groundwater does not appear warranted for this site since a) the groundwater is not considered for potential use, and b) groundwater remediation has not been required at other sites with confirmed impact occurring within the vicinity."

As regards a), reference is made to a concentration of > 5,000 ppm TDS in the aquifer of concern. Where was this sample taken? Where is the laboratory data? Where is the well screened from which the sample was taken? How are you defining the aquifer, i.e. in terms of depth? If this sample was taken from the upper aquifer, how will the existing contamination effect the lower aquifer, the Bay, and the wildlife? Even if the concentration of TDS is too high to consider the aquifer a potential potable water source, the aquifer may be a potential industrial or agricultural water source.

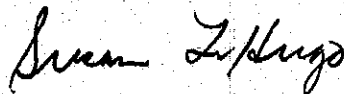
As regards b), reference is made to RWQCB consideration of impacted groundwater at the SPTCo wastewater impoundments and at the SPTCo tar pits as not posing a serious threat to the public or the environment. Can you produce documentation to this effect? As per telephone conversation on 6/3/92 between Jennifer Eberle of this office and Rich Hiatt of the RWQCB, he was not aware of any such consideration.

Please respond to these issues **within 45 days** from the date of this letter, or by **July 18, 1992**.

Greg Shepherd
STID 3706
Page 3 of 3
June 3, 1992

If you have any questions, please contact Jennifer Eberle at 510-271-4320.

Sincerely,



Susan Hugo
Senior Hazardous Materials Specialist

cc: Walter Floyd, Industrial Compliance, 9719 Lincoln Village Dr.,
Ste 310, Sacramento CA 95827
Rich Hiatt, RWQCB
File

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director

April 7, 1992



R0754

RAFAT A. SHAHID, Assistant Agency Director

STID #3706

Southern Pacific
Transportation Co.
One Market Plaza, Rm 1007
San Francisco CA 94105
Attn: Greg Shepherd

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

RE: 721 Cedar St.
Oakland CA 94607

Dear Mr. Shepherd,

This office has received and reviewed the Phase II Investigation report for the above referenced site dated December 19, 1991 by Industrial Compliance Inc. The case has been reassigned to Jennifer Eberle, Hazardous Materials Specialist. Please mail future correspondence to her attention.

Soil and groundwater was sampled on December 13, 1991. Significant concentrations of hydrocarbons were detected both in soil and groundwater. For example, groundwater sample A-1 exhibited 2,500 ppb TPH-g, 300 ppb benzene, 480 ppb toluene, 80 ppb ethylbenzene, and 430 ppb xylenes. Soil sampling revealed up to 3,400 ppm TPH-g, 0.77 ppm benzene, 0.35 ppm toluene, 6.5 ppm ethylbenzene, and 37 ppm xylenes.

At this time you are directed to perform the following tasks:

- 1) Determine the groundwater gradient beneath the site.
- 2) Determine the lateral and vertical extent of groundwater and soil contamination.
- 3) Submit a proposal which assesses the feasibility of pumping and treating contaminated groundwater.
- 4) Submit a proposal for treating and/or disposing the contaminated soil associated with the soil borings.
- 5) Communicate in writing as to the disposal of the stockpiled soil from the excavation of the tank. Was this soil sampled? Where are the analytical results? Show the location of the stockpile on a map relative to the site location (use Figure 3).
- 6) Continue to submit quarterly monitoring well sampling results to this office.

Greg Shepherd
April 7, 1992
Page 2 of 2

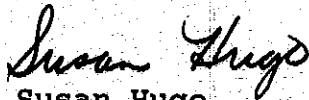
RE: 721 Cedar St.
Oakland CA 94607

- 7) Identify your sites by street address. Specifically, identify the address of "Tank 9 - The Desert Yard Office," "Tank B - A&WE Building and Systems Shop" and "Aboveground Diesel Storage Tank."

The proposals submitted in response to tasks 1, 2, 3, 4, 5, and 6 must adhere to the technical requirements outlined in the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks and the SWRCB LUFT Manual. The proposals are due within 45 days of the date of this letter.

If you have any questions, please phone Jennifer Eberle at 510-271-4320.

Sincerely,



Susan Hugo
Senior Hazardous Materials Specialist

cc: Rich Hiatt, RWQCB
Mark Dockum, Industrial Compliance, Inc.
File

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