

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0797

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

May 12, 1998

ATTN: Sir Or Madam

American National Can
8770 W. Bryn Mawr Ave.
Chicago IL 60631

RE: Project # 3018B - Type M
at 3801 E 8th St in Oakland 94601

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$737.60, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested or any unused monies will be refunded to you or your designee.

The deposit refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$94 per hour.

Please be sure to write the following identifying information on your check:

- project #
- type of project and
- site address

(see RE: line above).

If you have any questions, please contact Amir Gholami at (510) 567-6876.

Sincerely,

Tom Peacock, Manager
Environmental Protection

c: files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0797

RAFAT A. SHAHID, Director

August 2, 1995
STID # 1453

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

Mr. Joseph S. Moran, Esq.
Assitant General Counsel-Environmental
American National Can
Mail Suite 14C
8770 West Bryn Mawr Ave.
Chicago, Illinois 60631-3542

**Re: Request for Update on Sitewide Risk Management Plan (SRMP)
for Former ANC Facility, 3800 E. 8th St., Oakland CA 94601**

3801

Dear Mr. Moran:

This letter provides comment and requests an update on the SRMP for the former ANC facility in Oakland, site of the future K-Mart. As you are aware, our office and that of the RWQCB reviewed RUST's February 15, 1995 Outline-SRMP and met with your consultant to discuss its contents. Comments were incorporated in RUST's May 1995 report. Since this time additional developments have occurred at the site. It appears that the closure of the former RCRA permitted areas has been ANC's priority since the SRMP has not been addressed in any recent reports.

This letter requests specific information and gives the County's comment on new developments. I refer you to the May 1995 SRMP and comment on additions or deviations from the proposed actions in this report. I will address my comments to areas as they have been previously designated.

Area 2- Proposed work in this area will consist of the reinstallation of TW-1 and an additional well approximately 50 feet downgradient to this well. **Please provide a time schedule for the installation of these two wells.**

Within Area 2, an acetone tank was removed near Area 2 on April 5, 1995. There was evidence of release of soil contamination and overexcavation and sampling was performed. To date, our office has yet to receive the tank removal report for this activity. In addition, our office would like to know how this release will be incorporated in the SRMP. **Please provide a tank closure report for the acetone tank and address how this event will be addressed in your SRMP.**

Mr. Joseph Moran
StID # 1453
3800 E. 8th St.
August 2, 1995
Page 2.

Area 3- In essence, this area would continue to monitor all existing wells for the suite of parameters: VOCs via Method 8240, semi-volatiles via Method 8270, TPHg and TPHd. Additionally, MW-1 previously decommissioned will be reinstalled. Based on what was detected in Building #12 soils, the replacement well for MW-1 should be analyzed for the same analytes as the other wells. TPH as mineral spirits should also be run in the replacement well. **Please provide a time schedule for the installation of the replacement well for MW-1.**

Area 4- In addition to MW-14, a replacement well for MW-9 and a new well east of MW-14 will be installed. Recently, through conversation with Mr. Steve Krival of DTSC it appears that concentrations of contaminants have been detected in the surface soils of the temporary storage area for the excavated materials from the permitted areas. The presence of this contamination has not yet been resolved. Should there be a need to install a monitoring well downgradient to this area, please identify its location and the analytes of concern for this well. If a well is not necessary please describe how this decision is justified. **Please provide a time schedule for the installation of the wells in this area.**

As you're aware, our office has been overseeing the subsurface investigation at the former Ekotek site. Their initial investigation occurred in July 1995 and a report is anticipated in September 1995. Based on the results of this investigation, you may be able to determine if the contamination in temporary storage area is from the Ekotek site.

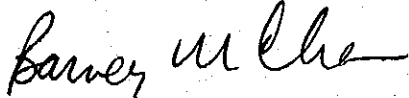
Area 5- One monitoring well was proposed within ten feet of the former Drum Storage Area in the assumed downgradient direction. Additional monitoring wells were at one time mentioned as a requirement of DTSC. **Please inform our office if more than one well is proposed for this area and provide a time schedule for well(s) installation.**

Please provide the requested report and technical information to our office **within 30 days or by September 5, 1995.**

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

Mr. Joseph Moran
StID # 1453
3800 E. 8th St.
August 2, 1995
Page 3.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
S. Arigala, RWQCB
R. Arulanantham, RWQCB
J. Kessler, High Street Associates
S. Krival, DTSC
E. Alusow, RUST E&I
W. Howard, RUST E&I
R. Burzinski, RUST E&I
R. Williams, Kmart Corporation
D. Bruegel, Esq., Dickinson, Wright
R. Creps, PES Environmental
Ms. J. Peters, ANC
T. Peacock, files

updtSRMP

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0797

September 15, 1993
StID # 1453

Mr. Rich Hiatt
RWQCB
2101 Webster St., Suite 500
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: Recommendation for Case Closure for Areas 1 and 5 at the
American National Can Site, 3801 E 8th St., Oakland CA 94601**

Dear Rich:

As you are aware, this site has been divided into five distinct areas of investigation, each with their own release, investigation and remediation. Areas 1 and 5 are ones which appear to have performed sufficient investigation. Our office agreed to discontinue groundwater monitoring in these areas in January 1992. On August 16, 1993 we received a written request from ANNC's consultant for the formal closure of these two areas. After file review, my August 20, 1993 letter to Ms. Judith Peters of ANCC, requested additional technical reports. On September 8, 1993, I received a September 1, 1993 report from ANNC's consultant, RUST Environment and Infrastructure, formerly Dunn Corporation, replying to my request for technical reports. After review of this report, I concur that these two areas of this site should be considered closed. I would like to summarize these two areas for your evaluation.

Area 1 (You may want to look at a site map if one is available).

This area is on the north corner of the site where a 500 gallon gasoline tank was removed in December of 1990. The initial soil sample under the tank at 8' contained 350 ppm TPHg. A soil sample at 10' contained 1300 ppm TPHg and after further excavation, a soil sample from 12' contained 4.9 ppm TPHg, 7.5 ppb benzene and ND TEX. Total lead in soil samples ranged from 5.8-9 ppm. All stockpiled soils were hauled under manifest to Kettleman Hills for disposal. Monitoring well, MW-12, was installed downgradient to the former tank's location. Gradient has been consistent for the period of well sampling. Four consecutive quarters of groundwater monitoring has occurred from April 91 to January 92 and no detectable TPHg or BTEX has been found in any monitoring event. The monitoring well was appropriately screened.

Mr. Rich Hiett
StID # 1453
3801 E. 8th St.
September 15, 1993
Page 2.

Area 5

This area is located in the center of the site where steam cleaning was previously performed. In August 1989, Dames and Moore investigated this area by advancing two borings to the north and south of this area. One sample was ND for TRPH and VOCs while the other sample, SC-1-2C, detected 3200 ppm TRPH via Method 418.1. Dunn Corporation did their own investigation in March 91, attempting to verify this observation. They installed four borings around this area, one of which was very close to the location of SC-1-2C. Their results did not confirm the previous results. They found from 2-9 ppm TRPH via Method 418.1. Monitoring well, MW-11, was installed in 3/91 downgradient to this location to investigate potential groundwater impact. Gradient has been consistent for the time of the groundwater sampling. Four consecutive quarters of monitoring occurred from April 91 to January 92. No volatile, semi-volatiles or PCBs were ever detected in these samplings. In the 4/91 event, 6.8 ppm TRPH was detected. In the 10/91 event, 89 ppb TPHd was detected. In addition, in July of 1993 a boring, B-2, was installed within the middle of the steam cleaning area. No gasoline, diesel, volatile organics or semi-volatiles were found. Monitoring well, MW-11, was screened from 8.5-19.0 feet though groundwater elevation equilibrates to approximately 3.0 feet.

Please contact me at (510) 271-4530 if you have any questions. In accordance with the recent SWRQCB letter, I assume that if our office does not hear from you within 30 days, you have no objections to our decision for areas 1 and 5 closure.

Sincerely,


Barney Chan
Hazardous Materials Specialist

cc: E. Howell, files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RO 7 97

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

August 20, 1993
StID 1453

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

American National Can Company
Ms. Judith Peters
8770 W. Bryn Mahr Ave.
Chicago IL 60631

**Re: Status of Subsurface Investigation in Areas 1 and 5 at
ANNC Site at 3801 E. 8th St., Oakland CA 94601**

Dear Ms. Peters:

Our office is in receipt of the August 11, 1993 letters from Mr. Edward Alusow of RUST Environment and Infrastructure Inc. These letters request a written confirmation from our agency that no further work be required in these two areas of the former ANCC site. Recall, our office had informally approved of the discontinuance of groundwater monitoring in these areas in our April 28, 1992 letter but had never officially "closed" these areas.

In these August 11th letters, data is referred to which supports the belief that adequate work has been done for these areas. Upon review of the data within the County's files, it appears that we are missing some of the data which will enable our office to make a recommendation. Please provide the following information for the respective areas so that we can make a decision on these areas:

Area 1: This area in the northwest corner of the property reportedly had a gasoline tank removed but no tank closure report nor sample data is available to document the removal. Three test borings were advanced around the perimeter of the former tank and a monitoring well, MW-12, was installed downgradient to the tank location and monitored quarterly. Please provide copies of the following:

- a. Analytical results and a site map for the three test borings
- b. Monitoring well log and soil boring results for MW-12
- c. All groundwater monitoring well results for MW-12, we are in receipt of the July and October 1991 monitoring results only.

Area 5: This area, on the southwest side of the site where steam cleaning occurred, was investigated for surface spillage problems. An investigation performed by Dames and Moore in 8/89 identified one soil boring sample, SC-1-2C, which exhibited 3200 ppm total petroleum hydrocarbons via method 418.1. Our office is in receipt of the August 7, 1991 report describing the results of three hand auger borings in the immediate vicinity of the steam cleaning facility which indicate little to no petroleum contamination.

Ms. Judith Peters
ANCC
StID #1453
3801 E. 8th St.
August 20, 1993
Page 2.

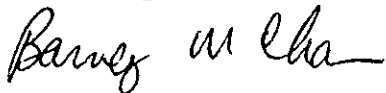
The August 11, 1993 letter states that a test boring, B-2, was advanced on July 20, 1993 through the base of the storm water catch basin within the center of the steam cleaning area. The boring near the location of SC-1-2C did not find similar contamination as to that previously found. The monitoring well, MW-11, downgradient to this area apparently has been monitored for a year. Please provide the following information:

- a. monitoring well log and soil sample boring results for MW-11.
- b. provide a sampling map and analytical results for test boring, B-2.
- c. provide a summary of all analytical results for groundwater sampling for MW-11. Our office has the monitoring results for 7/91 and 10/91 only.

We realize that these areas have been informally closed, however, because you are requesting formal written closure of these two areas within this site, the requested reports and documents are necessary for our office's evaluation.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: R. Hiett, RWQCB
E. Alusow, RUST Environment & Infrastructure, 12 Metro Park
Road, Albany, NY 12205
J. Moran, ANNC
R. Arulanantham, ACDEH
E. Howell, files

1&5-3801E8

E. Howell, file

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



R0797

DAVID J. KEARS, Agency Director

February 5, 1993

StID# 1453

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. Judith Peters
American National Can Company
8770 W. Bryn Mawr Ave.
Chicago, IL 60631

**Re: Required Actions for Area 3 at American National Can, 3801
E. 8th St., Oakland CA 94601.**

Dear Ms. Peters:

This letter serves to clarify the requirements of American National Can (ANC) in regards to Area 3 at the above site. This area is adjacent to Ekotek Lube and is being affected by the contamination migrating from this site. In an effort to clarify ANC's responsibilities, I contacted Mr. Walter Howard of Dunn Corporation and Mr. Eddy So of the Regional Water Quality Control Board (RWQCB). It was agreed that the contamination being found in monitoring wells within Area 3 is likely from Ekotek Lube and ANC will not be required to remediate this affected soil and groundwater. Ekotek Lube has gone bankrupt and no responsible parties have been identified to remediate their site. The modified sampling schedule approved by Mr. Dennis Byrne on 4/28/92 is accepted with the following condition for Area 3. ANC must, on a regular schedule, bail any free product from wells, GW-2, MW-3, MW-2 and GW-1. These wells cannot be abandoned with the knowledge that free product possibly exists in them per the Porter-Cologne Water Quality Act. These wells should be inspected at least quarterly to determine the presence of free product. It was also decided that no formal report will be needed to document that Ekotek Lube is the responsible party for Area 3's contamination. However, in the event the Ekotek Lube site is taken by DTSC (Department of Toxic Substances Control) (State Superfund) for remediation they may request documentation beyond the County's opinion regarding the source of ANC's contamination in Area 3 therefore documentation is highly recommended.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
W. Howard, Dunn Corp., 12 Metro Park Road, Albany, New York 12205
E. So, RWQCB
E. Howell, files 2-3801ANC

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0797

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

November 19, 1992
STID # 1453

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. Judith Peters
American National Can Company
5770 W. Bryn Mawr Ave.
Chicago, IL 60631

Re: Subsurface Investigation at American National Can,
3801 E. 8th St., Oakland CA 94601

Dear Ms. Peters:

This letter serves to summarize my conversation today with Mr. Walter Howard of Dunn Corporation. This conversation covered the discussion of the soil sample results taken after overexcavation in Area 4 at the above site. It was agreed that within this recently excavated area, the only area of significant soil contamination was around soil sample 13. It was also acknowledged that further excavation was not possible due to the existence of water lines and a storm drain. I, therefore, gave verbal approval to backfill the excavated area with clean backfill. The groundwater in the vicinity of soil sample 13 should be monitored quarterly in MW-8 for TPHg and BTEX.

Mr. Howard also stated that he had performed a pump test on GW-3 and that the concentrations of dissolved hydrocarbons had decreased significantly. Because of this, the initiation of the proposed groundwater extraction system will be on hold pending further groundwater monitoring. This approach is acceptable on the condition that this data is provided to our office and we concur with his conclusion. I understand a pump test will also be done on GW-6 in Area 2 to see if this same effect is observed.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: R. Hiett, RWQCB
W. Howard, Dunn Corporation, 12 Metro Park Road, Albany,
New York 12205
E. Howell, files
2-3801E8th

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0797

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

October 9, 1992

Fire Chief Jerry Bluford
Oakland Fire Prevention
421 14th St.
Oakland CA 94612

Re: Removal of Closed In-Place Underground Tank at American
National Can, 3801 E. 8th St., Oakland CA 94601

Dear Chief Bluford:

This letter is to acknowledge that an Underground Tank Removal
Plan from our office will not be required under the following
conditions:

1. The tank has been properly inerted ie it contains no free product or has any detectable LEL readings.
2. That the removal and disposal of the tank and any associated piping is done by a certified contractor and a licensed hazardous waste hauler.
3. Proper sampling in accordance with the "Tri-Regional Board Guidelines" is adhered to.
4. Our office has a site specific Health and Safety plan for the excavation and removal activities.

Please note that if the tank is not properly closed, an
Underground Tank Closure Plan must be submitted for our office's
approval prior to the removal.

You may contact me at (510)271-4350 should you have any
questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: E. Alusow, Dunn Corp, 12 Metro Park Rd., Albany,
New York, 12205
Ms. J. Peters, American National Can, 8770 W. Bryn Mawr Ave.
Chicago, IL 60631
D. Watts, Riedel Environmental, 4138 Lakeside Dr.,
Richmond 94806
E. Howell, files

AmNaCan-ust

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

R0797

July 20, 1992

Walter Howard
Dunn Corporation
12 Metro Park Road
Albany, N.Y. 12205

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

Subject: American Can Facility, ³⁸⁰¹~~3810~~ E. 8th St. Oakland, CA.

Dear Mr. Howard:

Thank you for the Remedial Plan for Area 4 of the facility listed above. I have reviewed this plan and approval is granted for its implementation subject to the following conditions:

- 1) The residual contamination levels that you intend to allow in backfill soil exceed those of the San Francisco Bay Regional Water Quality Control Board. You propose backfilling soil with a residual level of Benzene contamination of 5 ppm, up to 20 ppm of BTEX components and as much as 250 ppm of Total Petroleum Hydrocarbon. Benzene and Toluene are specifically listed chemicals which cannot be legally discharged in the State of California under the authority of the Toxic Enforcement and Safe Drinking Water Act ("Prop 65"). In addition, policies of the Regional Board prohibit the backfill of soil with a residual petroleum hydrocarbon contamination greater than 10 ppm.

To ensure compliance with local standards your proposed actions will have to be modified. Any excavated soil with a residual contamination level greater than 10 ppm of hydrocarbon contamination or any detectable level of Benzene or Toluene will require off-site disposal or on-site treatment to reduce the residual contamination levels to below these values prior to backfilling.

- 2) Prior to removing the underground storage tank that you anticipate encountering, Barney Chan, a Hazardous Materials Specialist with this office, should be contacted to determine if an Underground Storage Tank Closure Plan must be submitted.

Please direct further inquiries to Barney Chan, Hazardous Materials Specialist at (510) 271-4320.

Sincerely,

Dennis J. Byrne
Senior Hazardous Materials Specialist

cc: Lester Feldman, SFBRWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0797

RAFAT A. SHAHID, Assistant Agency Director

28 April 1992

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

Ms. Judith Peters
American National Can Company
8770 W. Bryn Mawr Avenue
Chicago, IL 60631

Subject: ANCC facility at 3801 8th Street, Oakland, California.

Dear Ms. Peters:

Thank you for the amended monitoring plan prepared by Dunn Corporation for the above-listed site. I have reviewed this plan dated 27 April 1992, and approval is granted for its implementation with the following modification. Well MW-9 should be incorporated into the monitoring scheme for Area 4 with samples being analyzed for BTEX and TPH-g. In addition, the report dated February 1992 appears to present an anomaly concerning the lead content of the ground water measured in wells MW-9 and MW-14. Unfiltered samples from these wells detected no lead contamination whereas filtered samples measured lead contamination in the parts per million range. A lead analysis should be incorporated into the sampling regime for these wells. These modifications should be included into the sample collection scheduled for the week of May 4th. Whether the modified sampling routine described in this letter will extend into subsequent sampling episodes will depend on the data obtained.

The contents of this letter have been discussed with Walter Howard of Dunn Corporation. If you have any questions concerning this matter, please feel free to contact me at (510) 271-4320.

Sincerely,

Dennis J. Byrne
Senior Hazardous Materials Specialist

cc: Rich Hiatt, SFBRWQCB
Rafat Shahid, Assistant Director, Alameda County Department of
Environmental Health
Walter Howard, Dunn Corp.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



January 21, 1992

Mr. Edward Alusow
Senior Project Manager
Dunn Corporation
12 Metro Park Road
Albany, New York 12205

Dear Mr. Alusow:

The Alameda County Environmental Health Department, Hazardous Materials Division, has received your proposal dated January 20, 1992, for a modified groundwater monitoring program at the American National Can Company (ANCC) facility in Oakland. The proposal calls for the elimination of the collection and analyses of groundwater samples for metals during the fourth round of quarterly monitoring at the facility scheduled to begin the week of January 27, 1992.

The modified groundwater monitoring program is acceptable to this Division with the following change. The metal analysis will be performed for Area 2, MW-13, MW-15 and TW-1 for zinc concentrations, both total and filtered. Collection and analyses for metals at MW-15 and TW-1 have only been carried out during the October 1991 sampling event. The next round of sampling will complete four quarters of monitoring at MW-13 but only the second sampling of MW-15 and TW-1. It is anticipated that the design of the upcoming remediation workplan will incorporate the data gathered from these samples to address the concentrations of zinc in excess of the Maximum Concentration Level (MCL) found for the last three quarters in Area 2, MW-13.

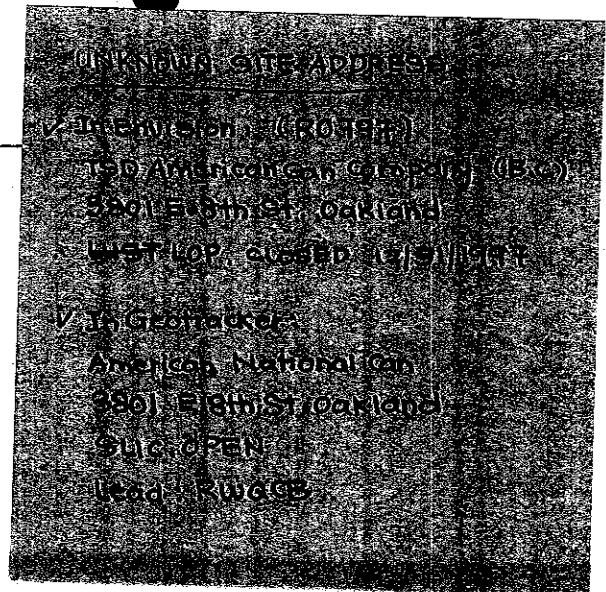
If you have any questions regarding this letter, please contact me at (510) 271-4320.

Sincerely,

Robert Weston
Hazardous Materials Specialist

RW:RW

c: Eddy So
Judith Peters



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



R0797

Telephone Number: (415)

October 18, 1991

ATTN: Ms. Judith Peters
American National Can Company
5770 W. Bryn Mawr Avenue
Chicago, IL 60631

Re: Project # 3018A
at 3801 E. 8th. Street, Oakland 94601

Dear Ms. Peters:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$670.00, payable to Alameda County.

Please write the project number and site address on your check.

We must receive this deposit before we perform any further work on this project. At the completion of this project, any unused monies will be refunded to you or your designee.

If you have any questions, regarding this matter please contact Robert Weston at (510) 271-4320.

Sincerely,

Edgar B. Howell III, Chief
Hazardous Materials Division

EH:rw

c: files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0797

April 17, 1991

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

Ms. Judy Peters
American National Can Company
Mail Suite 04D
8770 West Bryn Mawr Avenue
Chicago, IL 60631-3504

Dear Ms. Peters:

On April 17, 1991, I talked with Ms. Sheila Alfonso in the Permitting Section of the Region 2 California Department of Health Services (DHS) regarding what steps ANCC needs to take to be removed from the list of Treatment, Storage, and Disposal facilities. As I understand from the conversation, ANCC needs to resubmit the closure plan to DHS, with a letter certifying that the facility was closed in accordance with the closure plan. I recommend including a report of the actual closure activities, since the 1988 document only describes the proposed activities.

This closure report should be sent to:

Mike James
California Department of Health Services, Permitting Section
700 Heinz Avenue
Berkeley, CA 94710

If you have any other permit/closure questions, you can contact either Mr. James or Ms. Alfonso at 415/540-3734.

I explained to Ms. Alfonso that all the permitted activities had ceased, and that during my visit at the facility, the storage areas appeared clean and not to require any further action. I am enclosing a letter to you discussing the "findings" of my site visit regarding the storage areas. I am also returning your closure plan for the permitted storage facilities at the ANCC plant at 3801 East 8th Street, Oakland.

If you have any questions feel free to call me at 415/271-4320.

Sincerely,

Cynthia Chapman

Cynthia Chapman
Hazardous Materials Specialist

CB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0797

April 17, 1991

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

Ms. Judy Peters
American National Can Company
Mail Suite 04D
8770 West Bryn Mawr Avenue
Chicago, IL 60631-3504

Dear Ms. Peters:

On January 1, 1991, I visited the American National Can Company facility at 3801 East 8th Street, Oakland. The purpose of the visit was to walk through the facility to observe where past manufacturing practices had occurred, and to view the permitted hazardous waste storage areas. This facility currently warehouses empty cans.

There were two areas that were permitted by the DHS to store hazardous waste for longer than 90 days: the Drum Storage Area, and the Solder Dross Storage Area. Both of these areas had concrete floors, and the Drum Storage Area has a concrete berm around the perimeter. No hazardous waste is stored in these areas.

The concrete flooring in both locations was clean, and no staining was evident that would locate any past storage of leaking drums. As part of an environmental assessment, ANCC has done some soil sampling near the drum storage area. Analyses indicate no contamination resulting from the types of liquid waste stored in this area. There are no on-site treatment or disposal areas at this site.

I would recommend that the Hazardous Waste Storage Facility permit be closed out by the DHS, after you've submitted your closure plan to the Region 2 office.

If you have any questions feel free to call me at 415/271-4320.

Sincerely,

Cynthia Chapman
Hazardous Materials Specialist

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0797

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

December 7, 1990

Ms. Judith Peters
American National Can Company
8770 W. Bryn Mawr Ave.
Chicago, IL 60631

Dear Ms. Peters:

This letter is to follow up on the tank removal activities that occurred on December 4, 1990, at the American National Can facility at 3801 East 8th Street in Oakland, California.

The tank had several small holes in the bottom of the tank, apparently due to corrosion. This condition is considered to be a tank failure, based on investigation guidelines set by the California State Water Resources Control Board. Because of this tank failure, a soil and groundwater investigation is required to determine the lateral and vertical extent of the contamination. I informed Mr. Joseph Besca, of Dunn Geoscience, of these requirements and explained that American National Can will need to install monitoring wells as part of the groundwater investigation.

Two soil samples were taken from the excavation: One from approximately two feet below where the bottom of the tank was, and another one was taken two feet below this sample after excavating the bottom of the pit to remove as much contaminated soil as possible. Contamination was confirmed by laboratory analyses, which Mr. Besca phoned in to me on December 6, 1990. He indicated that both samples contained hydrocarbon contamination above 100 ppm (a case prioritization value), and proposed excavating down to near the water table, take a confirmation soil sample, and backfill with clean fill. I gave Mr. Besca my approval for those activities.

Mr. Besca has a copy of the "Underground Storage Tank Unauthorized Release/Contamination Site Report." I requested him to complete this and return it to our office within 14 days.

Our office will be the lead agency overseeing the soil and groundwater investigation at this site. The San Francisco Bay Regional Water Quality Control Board (RWQCB) 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 investigation requirements. However, please be aware that you are responsible for diligent actions to protect the waters of the

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State. All work must be performed according to the "Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tanks, 10 August, 1990," and the "Leaking Underground Fuel Tank Manual," from the California State Water Resources Control Board. I gave Mr. Besca the phone number to order these guidance documents. You are required to complete a workplan that provides information on how the subsurface investigation will proceed. Please submit this workplan within 45 days of the date of this letter. A format for the workplan and items to address is outlined below.

I. INTRODUCTION

- A. Statement of Scope of Work
- B. Site location
- C. Background
- D. Site History

Provide a brief description of the historic site use and ownership information, type of business and associated activities that take place at the site, types and location of any hazardous materials used on site, and a description of any known hazardous materials spills, leaks, or accidents. Provide a history of the use of the underground tank, its contents, and include the date of installation.

II. SITE DESCRIPTION

- A. Provide a map which shows streets, site buildings, underground tank locations, subsurface conduits and utilities, on-site and nearby wells, and nearby streams or water bodies.
- B. Provide a description of the hydrogeologic setting of the site and surrounding area. Include a description of any subsurface work previously done at the site.

III. PLAN FOR DETERMINING EXTENT OF SOIL CONTAMINATION ON SITE

- A. Describe how the extent of soil contamination associated with the former underground tanks will be determined.
- B. Describe the sampling methods and procedures to be used. If soil samples are to be collected for contamination delineation, consult the RWQCB guidelines for soil sampling

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protocols. During drilling of all boreholes and monitoring wells, undisturbed soil samples are to be collected at a minimum of every five feet in the unsaturated zone and at any changes in lithology for logging and analytical purposes. Borings and wells are to be permitted through Alameda County Flood Control and Water Conservation District, Zone 7. Their number is 415/484-2600. Borings and wells are to be logged from undisturbed soil samples. Logs shall include observed soil odors; blow counts shall be expressed in blows per 6 inches of drive.

If a soil gas survey is planned, the location of survey points must be identified along with the analytical methods and techniques to be used. A quality assurance plan for field analyses must be submitted.

- C. Soil samples are to be analyzed by a California State Certified Laboratory for the appropriate constituents.

IV. DETERMINATION OF GROUNDWATER QUALITY

- A. A minimum of three monitoring wells must be installed to determine the groundwater gradient. If the verified down-gradient location has been established, then complete gradient data must be submitted and one monitoring well will be required in the down-gradient direction.
- B. Monitoring wells shall be designed and constructed to be consistent with the RWQCB guidelines and to permit entrance of any free product into the wells. Filter pack and slot sizes for all wells should be based on particle analysis from each stratigraphic unit in at least one boring on the site and on the types of groundwater contaminants present. The well screen must be situated to intercept any floating product from both the highest and lowest ground water levels. All wells shall be surveyed to mean sea level to an established benchmark to 0.01 foot.
- C. Monitoring wells must be sampled for dissolved and floating constituents. Any free product is to be measured with an optical probe or by another method shown to have equivalent accuracy.
- D. A groundwater gradient map shall be developed for every water level data set. If the gradient fluctuates, water level measurements must continue to be made monthly until a gradient pattern is established. Fluctuations in groundwater levels due to tidal action must also be documented.

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- E. Sample monitoring wells monthly for three consecutive months. Free product thicknesses and water levels shall be measured in all wells for each sampling event before any purging or sampling activities are begun. After three consecutive months of sampling, all monitoring wells must be sampled at least quarterly for one year. Groundwater levels and quality must be monitored quarterly for a minimum of one year, even if no contamination is identified.
- F. Groundwater samples are to be analyzed by a California State Certified Laboratory for the appropriate constituents.

V. INTERPRETATION OF HYDROGEOLOGIC DATA

- A. Water level contour maps showing groundwater gradient direction and free and dissolved product plume definition maps of each contaminant constituent should be prepared routinely and submitted with other sampling results.
- B. The hydrogeologic characteristics of the aquifer must be described. An estimate of vertical transmissivity, based on a laboratory permeability test or a pump test, is required for any unit identified as a clay. Identification of the clay should be verified by particle analysis (ASTM D-422).
- C. The cross sections, groundwater gradients (horizontal and vertical) should be interpreted to explain pollution migration patterns.

VI. DETERMINATION OF THE TYPES OF BENEFICIAL USES OF THE GROUNDWATER

The State has defined all San Francisco Bay Area water as having beneficial uses; however, the types of beneficial uses vary and must be determined in order to establish appropriate cleanup levels. Beneficial uses include drinking water, irrigation, groundwater recharge, wild life habitat, contact and non-contact recreation, fish migration, etc. A drinking-water beneficial use "aquifer" is defined as an aquifer yielding water of less than 3,000 units of total dissolved solids and yielding water at a rate of at least 200 gallons per day.

VII. SITE SAFETY PLAN

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VIII. REPORTING

- A. A technical report must be submitted, within 30 days of completion of the investigation, which presents and interprets the information generated during the initial subsurface site investigation. At a minimum, the report must include the following items: Site history information, boring and well construction logs, records of field observations and data, chain-of-custody forms, water level data, water level contour map showing groundwater gradient direction, contaminant plume maps, tabulations of soil and groundwater contaminant concentrations, status of soil contamination characterization, description of any remedial work performed, laboratory-originated analytical results for all soil and groundwater samples analyzed, copies of TSDF-to-Generator manifests for any hazardous wastes hauled off-site, a description on where non-hazardous contaminated soils went, and any recommendations for additional investigative or remedial work.
- B. All reports and proposals must be signed by a California-Certified Engineering Geologist, California-Registered Geologist or a California-Registered Civil Engineer. A statement of qualifications should be included in all reports. Borehole and monitoring well installation and logging, and impact assessments will require the signature of such a professional.
- C. The technical report must be submitted with a cover letter from American National Can Company and received in this office by the established due date. The letter must be signed by a principal executive officer or by an authorized representative of the company.

Any stockpiled soil associated with tank removal activities or investigation activities must be sampled to determine the proper disposition of the soil. The number of samples collected from the stockpile(s) must be adequate to characterize the soil for the appropriate soil handling method.

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and to the 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 or the RWQCB.

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We will require a deposit/refund for reviewing the work plan and for oversight of your case. Please remit \$600.00, payable to Alameda County.

Should you have any questions concerning the contents of this letter or the status of this case, please feel free to contact me at 415/271-4320.

Sincerely,



Cynthia Chapman
Hazardous Materials Specialist

c: Mr. Lester Feldman, RWQCB
Mr. Joseph Besca, Dunn Geoscience
Mr. Richard K. Baker, American National Can Company

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0797

Certified Mailer #: P 062 128 174

December 5, 1990

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

Mr. Richard K. Baker
American National Can Company
8770 West Bryn Mawr
Chicago, Illinois 60631

Dear Mr. Baker:

I have reviewed the February 16, 1990, Dames & Moore report, titled "Phase I Environmental Site Investigation," for the American National Can Company facility, located at 3801 East 8th Street, Oakland, California. This report was sent to the San Francisco Bay Regional Water Quality Control Board (RWQCB) under cover letter dated March 5, 1990, from Cynthia Tasker of Derby, Cook, Quinby, and Tweedt. This report describes the soil boring and groundwater well installation activities that occurred from August through October of 1989. Five wells were installed roughly around the perimeter of the property, with GW3 installed near the location of a former solvent storage underground tank farm, and GW4 near a former drum storage area. One well, GW6, already existed at the site, and is located on the northeastern portion of the site.

The report notes that during water level measurements performed on October 6, 1989, GW6 was found to have free product and was not sampled. On Table 1 of the report, which presents the water level measurements of the six wells, it states, "Floating product encountered at a depth of 14'11", measured thickness of 4'4". This report does not discuss if any attempt at removing the free product was made, nor does it provide any information on what the floating product is, where it is coming from, or why the well was there.

This floating product constitutes an unauthorized release, which requires American National Can to report this unauthorized release to the RWQCB and to the Alameda County Hazardous Materials Division within five days of the discovery of the release. There is no information that indicates American National Can notified either agency at the time the floating product was encountered.

In addition, 9,000 parts per billion of 2,4 - Dimethylphenol was detected in GW1. This value is over 20 times greater than the applied action level set by EPA. Benzene, toluene, 1,1 - Dichloroethane, and vinyl chloride were detected in either or both GW1 and GW2 above the California Applied Action Level limits. Again, no attempt was made to notify the appropriate agencies within the time frame.

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To address these items, you are required to:

1. Immediately remove any floating product in GW6 and identify it. This well shall be visually monitored on a bi-weekly basis, and samples are to be analyzed quarterly for the appropriate constituents.
2. Begin quarterly monitoring of all groundwater wells immediately and submit reports of analyses to both RWQCB and Alameda County.
3. Provide a workplan, within 30 days of the date of this letter, to the RWQCB and Alameda County that address the issue of contamination in GW6 and in GW1 and GW2. Items to be addressed include identifying and investigating the source of contamination of GW6, and investigating the lateral and vertical extent of the contamination in the soils around GW6. In addition, a groundwater investigation needs to be performed to determine the extent of groundwater contamination surrounding this area. For GW1 and GW2, delineate the extent of subsurface contamination and identify the source of contamination.

This is a formal request for technical reports pursuant to California Water Code Section 13267(b). Alameda County works in conjunction with the RWQCB. All reports, proposals, and analytical results pertaining to this investigation must be sent to our office, and to Lester Feldman of the RWQCB. His address is:

Lester Feldman
Regional Water Quality Control Board, San Francisco Bay
Region
1800 Harrison Street, Suite 700
Oakland, CA 94612

To cover our costs for overseeing this case, Alameda County Ordinance, Article 11, Section 3-141.6, allows the Hazardous Materials Division to request a deposit to bill against. The hourly rate is \$60.00 per hour. All monies not used during the oversight process will be refunded. Please submit a check, payable to Alameda County, for \$600.00.

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Failure to respond or a late response will result in referral of this case to the RWQCB or District Attorney's office for enforcement.

If you have any questions concerning this letter, please call me at 415/271-4320.

Sincerely,

Cynthia Chapman

Cynthia Chapman
Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, San Francisco Bay Regional Water Quality
Control Board
Howard Hatayama, California Department Of Health Services