

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

R0849

December 2, 1994

Mrs. J.C. Delanoy
3640 Grand Ave., Ste 2
Oakland, CA 94610

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

STID 310

Re: Required investigations at 1901 Broadway, Alameda, CA

Dear Mrs. J.C. Delanoy,

On April 28, 1994, one 1,000-gallon gasoline underground storage tank (UST) was removed from the above site. Soil and ground water samples were collected from the tank pit. The soil sample collected from beneath the tank identified low levels of Total Petroleum Hydrocarbons as gasoline (TPHg) at 3.7 parts per million (ppm), benzene at 0.015 ppm, toluene at 0.078 ppm, ethylbenzene at 0.042 ppm, and xylenes at 0.36 ppm. The "grab" ground water sample collected from the pit identified elevated levels of TPHg at 4,800 parts per billion (ppb), benzene at 640 ppb, toluene at 700 ppb, ethylbenzene at 76 ppb, and xylenes at 550 ppb. The Federal Environmental Protection Agency's drinking water standard or Maximum Contaminant Level (MCL) for benzene is 1 ppb.

On June 13, 1994, one additional "grab" ground water sample was collected from the tank pit, after purging the ground water in the tank pit and allowing it to recharge. TPHg and benzene, toluene, ethylbenzene, and xylenes (BTEX) were not identified above detection limits in this sample.

Although TPHg and BTEX were not identified in the second "grab" ground water sample, it appears that there has been some impact to both soil and ground water based on the initial soil and ground water samples collected. Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that soil and ground water investigations be conducted when there is evidence to indicate that a release from an UST will impact or may have impacted the ground water.

RWQCB guidelines stipulate that a minimum of four quarters of ground water monitoring is required to confirm that ground water has not been impacted. This involves the installation of monitoring well(s) to allow for the proper sampling of ground water (i.e., purging and testing of pH, conductivity, and temperature stabilization), and four consistent quarters of monitoring.

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You are required to conduct a **Preliminary Site Assessment (PSA)** to determine the lateral and vertical extent and severity of **both soil and 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 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. During the installation of these 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 three 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 must be analyzed for TPHg and BTEX**. Additionally, due to the uncertainty as to whether the former 1,000-gallon UST historically contained leaded gasoline, you will be required to analyze the next round of ground water samples for total lead.

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

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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.

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 90 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.

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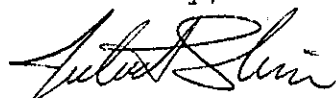
Additionally, this office is requesting that you submit documentation, such as manifests, showing the fate of the removed tank and the excavated soil. Additionally, soil samples were required to be collected from the excavated/stockpiled soil. Please submit a copy of the analysis results for stockpiled soil samples.

Lastly, per Title 23 California Code of Regulations, this office requires that an Unauthorized Release/Leak Report Form be completed when any contaminant concentrations are identified in association with an underground storage tank. Please complete the attached Unauthorized Release/Leak Report Form and submit it to this office within 30 days of the date of this letter.

These required investigations are essential in determining whether there has been or will be any future impacts to soil and ground water from the former gasoline tank. If, following the investigations, it is determined that the past releases from the tank do not and will not pose a threat to soil and ground water, this office will issue a letter certifying closure.

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

DAVID J. KEARNS, Agency Director



R0849

RAFAT A. SHAHID, Assistant Agency Director

December 28, 1993

CERTIFIED MAILER #: P 386 338 233

Warehouse Bldg. No Tank Usage
1901 Broadway
Alameda, 94501
UGTID: 310

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

**Re: FIVE-YEAR PERMITS FOR OPERATION OF UNDERGROUND STORAGE TANK(S)
1901 Broadway 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)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0849

January 31, 1991

Joan & Fred Delanoy
3640 Grand Ave. Suite 6
Oakland, CA 94610

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

re: 1901 Broadway, Alameda, 94501

FINAL NOTICE OF VIOLATION

Dear Joan & Fred Delanoy:

Our records indicate that there are underground tank(s) at your site at the above facility. Attached are Forms A and B for your submission.

In accordance with the California Code of Regulations, Title 23, Chapter 3, Subchapter 16 Underground Tank Regulations you must perform one of the following actions:

1. Submit a tank closure plan to this Department as required by Article 7, 2670, or
2. Apply for a permit as required by Article 10, 2710.

You are directed to notify this Department within 10 days of your intentions and to obtain the necessary instructions and forms.

Please note that section 25299 of the California Health and Safety Code states that any operator or owner of an underground storage tank is liable for a civil penalty of not less than five hundred dollars or more than five thousand dollars per day for failure to obtain a permit, or failing to properly close an underground storage tank, as required by section 25298.

If you have any questions concerning this matter, please contact this office at 271-4320.

Sincerely,

Thomas F. Peacock, Senior HMS
Hazardous Materials Division

TFP:tfp

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Lester Feldman, RWQCB