

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KILARS, Agency Director

August 6, 1993

STID# 4266



RAHAT 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

Mr. Ignacio Dayrit
City of Emeryville
Redevelopment Agency
2200 Powell Street, Suite 1200
Emeryville, California 94608

**RE: Soil and Groundwater Investigation / Remediation at
4300 San Pablo Avenue, Emeryville, California 94608**

Dear Mr. Dayrit:

The Alameda County Department of Environmental Health, Hazardous Materials Division has recently reviewed the files concerning the investigation/remediation associated with the unauthorized release from the former tanks at the site.

Based upon this review process, the recommendation by Subsurface Consultant, Inc. to revised the groundwater monitoring program to semi-annual monitoring **can not be implemented at this time.** Although we acknowledged the work (investigation/groundwater monitoring) performed by the City of Emeryville at the referenced site to date, further characterization is required to completely define the extent of the site plume. The "zero isoconcentration line" must be determined. It appears that monitoring well MW-1 (upgradient well) has been detecting **increasing** elevated levels of TPH as gasoline (1.00 ppm during the last monitoring event - 4/30/93). The downgradient well (MW-6) detected TPH as diesel (0.06 ppm), benzene (0.7 ppb), toluene (1.9 ppb), xylene (3.1 ppb) and ethyl benzene (0.7 ppb) during the sampling event on 1/27/93. However, during the last sampling event (4/30/93), BTEX was non detectable and TPH as diesel decreased to 0.05 ppm.

Clearly, the extent of soil/groundwater contamination has not been completely determined. Please submit a work plan to delineate the extent of the hydrocarbon plume.

Groundwater monitoring wells must be sampled on a quarterly basis and analyzed for target compounds. It was noted from the Groundwater Monitoring Event #4 report prepared by SCI and dated May 24, 1993, that **no groundwater monitoring occurred during the entire year of 1992.** Quarterly monitoring is the maximum sampling interval allowed when groundwater contamination is present as per the "Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites", August 10, 1990. At this time, you must adhere to the quarterly monitoring program which includes groundwater elevation measurements. After

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four quarters of non detectable levels have been achieved, the frequency of sampling events will be evaluated and/or a recommendation for signoff/case closure by RWQCB will be determined.

Until cleanup is complete, you will need to submit reports to this office **every three months** (or at a more frequent interval, if specified at any time by either this office or RWQCB. In addition, the following items must be incorporated in your future reports or workplans:

- a cover letter from the responsible party or tank owner stating the accuracy of the report and whether he/she concurs with the conclusions and recommendations in the report or workplan
- site map delineating contamination contours for soil and groundwater based on recent data should be included and the status of the investigation and cleanup must be identified
- proposed continuing or next phase of investigation / cleanup activities must be included to inform this department or the RWQCB of the responsible party or tank owner's intention
- any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained
- historical records of groundwater level in each well must be tabulated to indicate the fluctuation in water levels
- tabulate analytical results from all previous sampling events; provide laboratory reports (including quality control/quality assurance) and chain of custody documentation

Your work plan must be submitted to this office **no later than September 27, 1993**. All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project.

Because we are overseeing this site under the designated authority of the Regional Water Quality Control Board, this letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency.

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Should you have any questions regarding this letter, please contact me at (510) 271-4530.

Sincerely,



Susan L. Hugo
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health
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