

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

R0901

September 14, 1998

ENVIRONMENTAL HEALTH SERVICES

1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
(510) 337-9335 (FAX)

STID 6619

Mr. Jon K. Wactor  
Luce, Forward, Hamilton & Scripps LLP  
121 Spear Street, Ste. 200  
San Francisco, CA 94105

RE: Underground Storage Tanks at Hacienda Crossings, Dublin, California

Dear Mr. Wactor:

As you are aware, this agency was contacted on or around September 1, 1998 to facilitate the proper closure of an underground storage tank (UST) discovered during activities associated with the construction of a roadway and underground utility lines at the former Santa Rita property in Dublin. A second UST was subsequently discovered adjacent the first. At the time of and for several days following their discovery, the history of the USTs was not fully understood.

An UST closure application was submitted and its review expedited by this agency and the Alameda County Fire Department (ACFD). We understand that a permit for UST closure was subsequently issued by ACFD during the week of September 7, 1998.

On September 10, 1998, this office received copies of documents dating from 1985 and 1986 that we understand were recently discovered by your consultant. These documents appear to demonstrate that the subject tanks, previously associated with the former Santa Rita Rehabilitation Center hospital, had previously been closed in-place during June 1986 with approval from the California Regional Water Quality Control Board, San Francisco Bay region. The USTs, which had been used for storing diesel fuel, were reportedly opened, cleaned, filled with sand, and then subsequently resealed and reburied.

Prior to initiation of the in-place UST closures, a release from the tanks was identified during the 1985 installation of an apparent compliance groundwater monitoring well. In February 1986, the RWQCB directed the Alameda County Public Works Agency, the apparent owner of the subject tanks at that time, "...to define the extent of floating product, and determine if the dissolved fuel constituents are present beyond the perimeter of the floating product area." Three (3) groundwater monitoring wells and two (2) soil borings were completed during the subsequent investigation. The results of this investigation appear to demonstrate that petroleum products had been released into the soil and groundwater, and that the release was substantially limited to the area proximal to the UST cluster.

Mr. Jon K. Wactor  
Re: Hacienda Crossings  
September 14, 1998  
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It is unclear whether or not an "official" case closure letter was ever issued by the RWQCB, however, as none was enclosed with the documents presented to this agency. We understand the Alameda County General Services Agency (GSA) also searched their files for evidence of official case closure and, having found none, contacted the RWQCB in an attempt to locate a case closure letter for this site. We understand that such a letter was not found. All indications are, however, that the RWQCB directive was fully complied with in 1986, and that no further work was likely requested.

After rediscovery of the tanks two weeks ago, and in preparation for the (then pending) UST closures, soil samples were collected September 4, 1998. Laboratory results reveal a 10-fold decrease in concentrations of diesel-range hydrocarbons as compared to the initial samples collected in 1985 from a similar location adjacent to the UST cluster.

In conclusion, it appears, based on these reported facts, that the subject tanks were permanently closed in compliance with the standards applicable at that time. In our view, both tanks ceased being "underground tanks" by definition after in-place closure was completed, as neither could have inputs or withdrawals. Therefore, the subject "tanks" are no longer considered USTs and are now viewed by this agency as mere construction impediments. Consequently, no further involvement by this agency with respect to their removal is deemed necessary or appropriate.

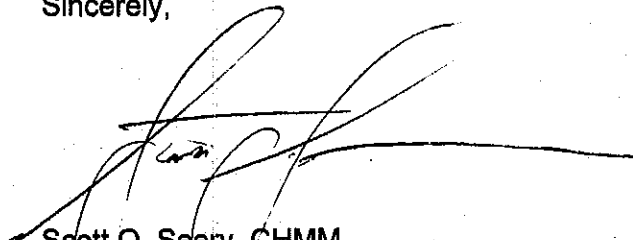
Further, based solely on the information provided to us, no additional work will be requested from this agency with respect to the historic release from the USTs as: 1) first encountered groundwater at the subject site is shallow (<20' below grade) and not considered a potable drinking water source; 2) 1986 concentrations of benzene, toluene, and total xylene isomers (BTX) in groundwater collected from well SRM-1, formerly located within the apparent backfill of the UST cluster, were <50 parts per billion (ppb); 3) recent soil sample data demonstrate a 10-fold decrease in concentration when compared to 1985 sample results; and, 4) the subject former tank site will be located below a roadway within a commercial development.

We understand that the subject "tanks" will be dismantled in situ, removed in sections, and the steel sent to a metal recycling facility. We further understand that an effort will be expended to over-excavate the resultant tank pit and remove accumulated tank fill materials in an effort to remove any obvious hydrocarbon contamination that might be encountered. We expect that any impacted material excavated in this fashion be handled, transported and disposed of in a lawful fashion commensurate with wastes of its type.

Mr. Jon K. Wactor  
Re: Hacienda Crossings  
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Please keep this agency apprised of the final disposition of any impacted material removed and environmental samples analyzed during completion of this specific excavation project. Please also call the undersigned at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

c: Mee Ling Tung, Director, Environmental Health  
Chuck Headlee, RWQCB  
Ed Laudani, Alameda County Fire Department  
Rod Freitag, Alameda County GSA

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0901

RAFAT A. SHAHID, DIRECTOR

December 4, 1995

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

STID 5541

Mr. Rod Freitag  
Alameda County GSA  
Engineering & Environmental Management Department  
1401 Lakeside Drive, 11th Floor  
Oakland, CA 94612

RE: SANTA RITA FACILITY, CENTRAL PARCEL, "OLD BOILER PLANT,"  
USTS 1, 2, 3 - SUPPLEMENTAL SITE ASSESSMENT

Dear Mr. Freitag:

I am in receipt of the November 1995 Environmental Science & Engineering, Inc. (ESE) *Workplan for Site Investigation, UST 1, 2, 3 Site* for the supplemental investigation of the former "Old Boiler Plant" underground storage tank (UST) area. Three soil borings will be advanced with soil and Hydropunch® ground water samples collected from each.


The cited ESE work plan has been accepted as submitted.

Please call me at 510/567-6783 when field work is scheduled to begin or you have any questions.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc:  Jun Makishima, Acting Director  
Robert Weston, ACDEH  
Bart Miller, Environmental Science & Engineering, Inc.

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0901  
RAFAT A. SHAHID, DIRECTOR

STID 5541

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

September 25, 1995

Mr. Rod Freitag  
Alameda County General Services Agency  
Engineering & Environmental Management Dept.  
1401 Lakeside Drive, 11th Floor  
Oakland, CA 94612

RE: SANTA RITA - FORMER MILITARY HOSPITAL SITE, USTs #18 & 19

Dear Mr. Freitag:

This office has reviewed the September 12, 1995 Versar, Inc. (Versar) report evaluating the results of the sampling of stockpiled material presently located at the noted Santa Rita subsite. As you are aware, the subject stockpiles are comprised of material derived from the UST 18/19 closures (~160 yds<sup>3</sup>), ~200 yds<sup>3</sup> excavated during tank closures at the "Old Graystone" fueling complex, and ~100 yds<sup>3</sup> of surplus backfill material from the Highland Hospital (Oakland) tank removal. Each stockpile contains some residual concentrations ( $\leq$ 360 ppm) of petroleum oil and grease and/or diesel-range fuel compounds. Fuel aromatic compounds were not detected.

Versar reportedly evaluated the subject analytical results in context with other sampling data generated in preparation to perform leachability studies (SESOIL) for materials derived from two other Santa Rita subsites during previous tank closures. These data were compared in order to extrapolate leachability and vertical transport potential of the subject soil stockpiles should they be reintroduced to the site at grade.

Versar reports that, based on their data extrapolation, the subject stockpiled material may be spread on site without adversely affecting underlying ground water. Versar concludes that such material could be safely spread in areas slated for commercial or industrial development, and that reintroduction of this material to areas of the site planned for *residential* development is not recommended in the absence of a human health risk evaluation.

This office concurs with this evaluation. Therefore, the subject material may be reintroduced **at grade** to the site of origin (Santa Rita) in areas anticipated for commercial or industrial development.

Mr. Freitag  
RE: Santa Rita, UST 18/19, stockpiles  
September 25, 1995  
Page 2 of 2

Please contact me at 510/567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Jun Makishima, Acting Agency Director  
Kevin Graves, RWQCB  
Tom Peacock, ACDEH  
Rob Weston, ACDEH  
Jim Ferdinand, Alameda County Fire Department

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0901  
RAFAT A. SHAHID, DIRECTOR

STID 5541

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

September 25, 1995

Mr. Rod Freitag  
Alameda County General Services Agency  
Engineering & Environmental Management Dept.  
1401 Lakeside Drive, 11th Floor  
Oakland, CA 94612

RE: SANTA RITA - FORMER MILITARY HOSPITAL SITE, USTs #18 & 19

Dear Mr. Freitag:

This office has reviewed the July 20, 1992 and June 26, 1995 Environmental Science & Engineering, Inc. initial and supplemental UST closure reports for the referenced Santa Rita subsite. The referenced reports document that no noteworthy releases of petroleum hydrocarbons from USTs #18 and 19 have occurred. Consequently, no further environmental investigations are required for these UST sites.

This department is satisfied that USTs #18 and 19 have been closed in full compliance with the requirements of Title 23, California Code of Regulations.

Please contact me at 510/567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Jun Makishima, Acting Agency Director  
Tom Peacock, ACDEH  
Rob Weston, ACDEH  
Jim Ferdinand, Alameda County Fire Department

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0901

RAFAT A. SHAHID, Assistant Agency Director

January 26, 1995

ALAMEDA COUNTY CC4530  
ENVIRONMENTAL PROTECTION DIVISION  
1131 HARBOR BAY PKWY., #250  
ALAMEDA CA 94502-6577

3

Mr. Andy Garcia  
Alameda County General Services Agency  
Engineering & Environmental Management Dept.  
1401 Lakeside Drive, 11th Floor  
Oakland, CA 94612

RE: SANTA RITA REHABILITATION CENTER

Dear Mr. Garcia:

As we discussed at yesterday's meeting, in order to facilitate development and ownership transfer of the contiguous Alameda County property previously identified as the "Santa Rita Rehabilitation Center," the subject parcel has been divided administratively into three separate sites. Divisions are based on geographic location, planned use, and relative locations of former underground storage tank (UST) clusters.

Each site has been assigned a distinct site identification number and name, as follows:

| <u>SITE NAME</u>             | <u>UST</u>                     | <u>STID</u>  |
|------------------------------|--------------------------------|--------------|
| Santa Rita - Old Graystone   | 9, 11<br>12, 12A               | 4086 (R0791) |
| Santa Rita - Central Parcel  | 1, 2, 3<br>4, 4A, 4B<br>18, 19 | 5541 (R0901) |
| Santa Rita - Engineer's Hill | 23                             | 5540 (R0646) |

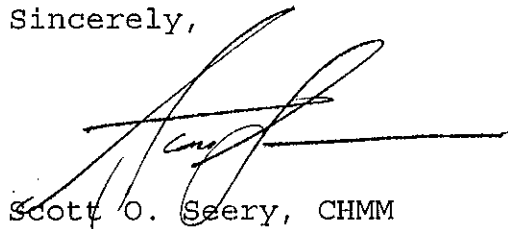
In a few days your office will be receiving notification letters for each of the new Santa Rita sites, the exception being the "Old Graystone" subsite. These notices will inform you of the reimbursement mechanism through the State Water Resources Control Board for this agency's continued oversight of the remaining UST projects.



Mr. Andy Garcia  
RE: Santa Rita  
January 26, 1995  
Page 2 of 2

Please contact me at 510/567-6783 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott O. Seery", is written over a horizontal line.

Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director  
Tom Peacock, ACDEH

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0901

RAFAT A. SHAHID, Assistant Agency Director

STID 4086 5541

January 11, 1995

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

Mr. Andy Garcia  
Alameda County General Services Agency  
Engineering & Environmental Management Dept..  
1401 Lakeside Drive, 11th Floor  
Oakland, CA 94612

RE: SANTA RITA FACILITY - "OLD BOILER PLANT," UST 1, 2, 3

Dear Mr. Garcia:

I have completed a review of the case file for this Santa Rita subsite, up to and including the December 21, 1994 Environmental Science & Engineering, Inc. (ESE) *Site Assessment Report*, as submitted under GSA cover dated January 3, 1995. As recommended in the cited ESE report, please adhere to a quarterly sampling, monitoring, and reporting schedule, maintaining the same target analytes as with the initial phase of this current investigation.

The case file indicates that, following the reported over-excavation of the former UST complex, a final soil excavation report appears not to have been submitted. During a phone conversation on May 17, 1988 between this office and Mr. Stanley Klemetson of Gregg & Associates, Inc. (GAI), the contractor performing the remediation work at the site at that time, Mr. Klemetson indicated approximately 600 yds<sup>3</sup> of affected material had been excavated and soil samples collected. It is the report documenting this work which we do not have.

Please submit this final excavation/sampling report. Should you discover that such a report was never issued, or is currently not in GSA's possession, the report or raw analysis data may still be available from GAI.

Please contact me at 510/567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

Mr. Garcia  
RE: Santa Rita, UST 1, 2, 3  
January 11, 1995  
Page 2 of 2

cc: Rafat A. Shahid, Agency Director  
Robert Weston, ACDEH  
Bart Miller, ESE

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RO791  
✓ RO901  
RO2760  
RO2808

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

September 21, 1993

Mr. Jim de Vos  
Alameda County General Services Agency  
4400 Mac Arthur Boulevard  
Oakland, CA 94619

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: GSA ENVIRONMENTAL CASES

Dear Mr. de Vos:

This office is pleased with the positive and productive outcome of the September 15 meeting. Open communication between our offices will ensure that the efficiency and cost-effectiveness of current and future GSA environmental cases will stay in balance with project objectives, and within the spirit and scope of regulation.

As promised, following is a summary of the environmental cases discussed during our meeting which currently require some measure of initial or additional assessment, or corrective action:

**Santa Rita facility                      STID 4086**

(RO791)

**USTs 1, 2, 3**

Up to 15,500 ppm TPH-D and 1,097 ppm oil and grease (O & G) discovered in soil samples collected at a depth of 15.5' below grade (BG). Plan for overexcavation and "treatment" of contaminated soil proposed. No outcome of this plan reported.

- NEEDS:**
- 1) Preliminary site assessment (PSA) work plan to be developed, submitted for review, and implemented once approved.
  - 2) Develop corrective action plan (CAP).

**USTs 4, 4A, 4B**

Up to 15,000 ppm TPH-D and 5,300 ppm O & G discovered in soil samples collected at a depth of 14' BG.

- NEEDS:**
- 1) PSA work plan to be developed, submitted for review, and implemented once approved.
  - 2) Develop CAP.

Mr. de Vos  
RE: GSA environmental cases  
September 21, 1993  
Page 2 of 3

**UST 9**

Up to 310 ppm TPH-D discovered in soil sampled from below tank during closure. No Unauthorized Release Report (ULR) filed.

- NEEDS:**
- 1) PSA work plan to be developed, submitted for review, and implemented once approved.
  - 2) Develop CAP.
  - 3) Submit ULR.

**Juvenile Hall**

**STID 4342**

Up to 1,500 ppm TPH-D discovered in soil samples collected below tank during July 1993 closure.

- NEEDS:**
- 1) PSA work plan to be developed, submitted for review, and implemented once approved.
  - 2) Schedule for removal of 2nd UST.

(R0901)

**Fairmont Hospital**

**STID 1174**

One (1) UST removed July 1993. Up to 12,000 ppm TPH-D discovered in soil sampled below tank.

- NEEDS:**
- 1) PSA work plan to be developed, submitted for review, and implemented once approved.
  - 2) Schedule for removal/closure of remaining USTs.

**ALCO Garage**

**STID 3909**

(R02760/R02808)

Significant concentrations of gasoline compounds have been detected in ground water collected from wells in proximity to active fuel USTs. Off-site migration is highly suspected. The source has not been determined.

- NEEDS:**
- 1) Develop and submit a soil and water investigation (SWI) work plan to define the extent of the contaminant plume. Implement the SWI once approved.

Mr. de Vos  
RE: GSA environmental cases  
September 21, 1993  
Page 3 of 3

- 2) Determine the source of the contamination.
- 3) Develop CAP.

Currently, UST leak investigations for Santa Rita tank sites located at Old Greystone (11, 12, 12A) and Engineers Hill (23) are on track. Approval of the scope of the "limited" PSA proposed for tank 23 will be addressed under separate cover. A "no further action" letter will be sent regarding tank 5. Further, records documenting closure of tanks 18 and 19 will be reviewed and a determination made regarding the need for additional work. Additionally, I will contact the RWQCB to discuss the status of Eden Fire Station #2 and the need for additional assessment.

A schedule for implementation of the referenced tasks must be developed. This schedule should be developed following a prioritization of the affected sites, largely based on a perception of the potential impact to current or future beneficial use aquifers, ability to retain pollutants on site, impacts to adjoining properties, ambient regional water quality, and proximity to potential receptors, among others. Another factor to consider is the visibility a particular site may have.

Please develop a priority scheme for these sites, and propose a schedule for addressing each element for every site. This schedule should be submitted within 45 days.

Please call the individual case workers for site-specific questions, or me for questions regarding topics of this letter, at 510/271-4530.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director  
Terry Hunt, GSA  
Ed Howell, ACDEH, Chief  
Tom Peacock, ACDEH, LOP  
Ariu Levi, ACDEH  
Robert Weston, ACDEH  
Jeff Shapiro, ACDEH