

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0911

RAFAT A. SHAHID, Assistant Agency Director

December 28, 1993

CERTIFIED MAILER #: P 386 338 260

Kaiser Center
300 Lakeside Dr.
Oakland, 94612
UGTID:4011

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)
300 Lakeside Dr. Oakland, 94612**

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,

Paul M. Oliva Sr.

Brian Oliva
HazMat Specialist

c: Edgar Howell, Chief, Hazardous Materials Div. (files)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0911

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

August 13, 1993
STID# 4011

Regional Water Quality Control Board
San Francisco Bay Region
ATTN: Rich Hiett
2101 Webster St., 4th Floor
Oakland, CA 94612

**SUBJECT: Recommendation for Case Closure
Kaiser Center
300 Lakeside Dr., Oakland, CA 94612**

This office has reviewed site investigation and remedial action for contamination from the underground storage tanks at the above site. Three 5,000 gallon gasoline tanks and one 3,000 gallon diesel tank were removed in June 1991. About 635 cubic yards of petroleum-bearing soil were removed at the time and transported under manifest to Class III and II landfills. 5,700 gallons of affected groundwater which had seeped into the excavation was disposed at Refinery Services in Patterson.

In 1990 a Phase I assessment of the soil and groundwater was done with the installation of MW-1. An additional well, MW-2, was installed in December 1991. Both wells are downgradient from the former tank pit, as determined using a well, W-2, on the adjacent Lakeside Towers site. Groundwater flow is to the east, towards Lake Merritt.

The source of the initial contamination was likely a piping leak that had been reported in 1975, as the tanks were noted to be in good condition during their removal.

After remediation a quarterly groundwater monitoring program was implemented. There have been 4 quarters of ND for TEH diesel, TEH kerosene, TVH gas, and BTEX.

With the provision that the information provided to this agency was accurate and representative of existing conditions, it appears that contamination has been remediated and the source has been removed. It is the position of this office that no further action concerning the two former underground storage tanks is required at this time.

This office requests that the Regional Water Quality Control Board reviews this case for closure. With the RWQCB's concurrence, this Department will send a letter to the Responsible Party to inform them of the site's closure.

Rich Hiett, RWQCB
Re: Kaiser Center
300 Lakeside Dr., Oakland, CA 94612
August 12, 1993
Page 2 of 2

If you have any questions or require further information, please call me at this office.

Sincerely,



Thomas F. Peacock, Supervising HMS
Hazardous Material Division

cc: Edgar Howell, Chief - Files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0911

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

March 18, 1993
STID 4011

Deborah Boyer
Kaiser Center Inc.
300 Lakeside Dr. Suite 2685
Oakland, CA 94612

RE: 300 Lakeside Dr., Oakland, CA 94612

Dear Deborah Boyer:

This office has received and reviewed a report dated 18 February 1993 in which well monitoring is requested to cease and site closure is requested by your consultant, Treadwell & Rollo, Inc. (T & R). This office has reviewed other documents concerning the above site. The following comments are to be considered:

1. Christoph Jennings of T & R has been informed of a monitoring well on an adjacent site at the Lake Merritt Towers.
2. An additional round of groundwater sampling needs to be done as there are only three quarters of ND.
3. The existing wells need to be surveyed and depth to groundwater measured to confirm the gradient in the immediate area. Data obtained from the offsite well should assist in this process.
4. You must submit a request for site closure to this office and the Regional Water Quality Control Board, accompanied by a summary of information needed, as in the attached outline. This outline needs to be followed so that the Regional Board can also see enough information to close the site.

If you have any questions, please contact this office at (510) 271-4530.

Sincerely,

Thomas Peacock, Supervising HMS
Hazardous Material Division

cc: Richard Hiatt, RWQCB
Edgar Howell, Chief - files
Christoph Jennings, Treadwell & Rollo, Inc., Sacramento
St. Suite 800, San Francisco, CA 94111
Enclosure

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

R0911

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

November 4, 1992

Ms. Deborah A. Boyer
Manager, Construction/Space Planning
Kaiser Center Inc.
300 Lakeside Drive
Oakland, CA 94643

**Re: Underground storage tank removals and subsequent site
mitigative action beneath the former gasoline and pipeline
dispenser at the Kaiser Center, 300 Lakeside Dr., Oakland, CA
94612**

Dear Ms. Boyer:

This is a follow up letter to a phone conversation which occurred on October 30, 1992 which I shared with your Consultant Chris Jennings of Treadwell and Rollo, Inc. (Treadwell) and you. As you will recall the discussion involved the area beneath the parking facility where a former gasoline dispenser had existed and in which piping was left in place. The discussion was regarding the need for a monitoring well within 10 feet in the down gradient direction of the former gasoline dispenser. Samples collected from beneath the former gasoline dispenser indicated Total Petroleum Hydrocarbon as gasoline (TPHg) contamination in soil as high as 330 ppm and benzene as high as 4 ppm.

In the course of the conversation Chris contended that a monitoring well adjacent to the former gasoline dispenser because two existing wells which are located in the inner drive area (approximately 75 - 100 feet away) would reflect any contamination from this source. As previously mentioned the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites specifies that when soil contamination in excess of 100 ppm of either TPH or Total Oil and Grease (TOG) is encountered, a monitoring well is required within 10 feet in the verified down gradient direction. This would be particularly relevant in the instance where contamination had not only had been detected but that it is intended to leave the contamination in place.

In the course of our discussion, I neglected to mention to both yourself and Chris that due to the proximity of the Kaiser site to Lake Merrit ground water gradient can be inferred however, based on data from only two existing on site monitoring wells, groundwater flow direction at this location has not been clearly or accurately defined. For this reason a third well is necessary.

Ms. Boyer
November 4, 1992
page 2 of 2

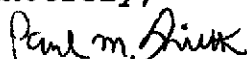
Additional reasons for the installation of a third monitoring well in the former dispenser location are the lack of clear definition of the lateral and vertical extent of the pollutant remaining in the former dispenser/piping location, the desire to leave contamination in situ and the fact that a third well has been specified by your consultant in two work plan revisions.

The installation of the monitoring well location specified in the April 10, 1992 work plan prepared by Treadwell is hereby formally approved. In advance of the monitoring well installation you are requested to notify this office so that if possible a representative from this office can be present when the work is performed. Additionally, if another subcontractor other than Treadwell actually performs the drilling work we will need a Health and Safety plan from them prior to work commencement.

Finally, a review of the deposit/refund account status for the Kaiser project indicates that the account for this project currently has a negative balance of -\$250.00. You are requested to remit a check for this amount payable to the County of Alameda. The deposit/refund mechanism is authorized by County Ordinance 3-141.6 of the Ordinance Code.

If you have any questions regarding the content of this letter please do not hesitate to contact me at 271-4320.

Sincerely,



Paul M. Smith
Senior Hazardous Materials Specialist

cc:

Christoph R. Jennings, Treadwell & Rollo, Inc., 353 Sacramento St., Suite 800, San Francisco, CA 94111
Rich Hiatt, San Francisco Bay Regional Water Quality Control Board, 2101 Webster St., Suite 500, Oakland, CA 94612

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0911

RAFAT A. SHAHID, Assistant Agency Director

March 23, 1992

Ms. Deborah A. Boyer
Kaiser Center
300 Lakeside Drive
Suite 2685
Oakland, CA 94612

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

Re: Underground Storage Tank Removal/ Replacement and Site
Remediation at Kaiser Center Oakland, 300 Lakeside Dr., Oakland CA
94612

Dear Ms. Boyer:

Alameda County Environmental Health Department, Hazardous Materials
Division is in receipt of the most recent correspondence from you
dated January 16 and March 2, 1992 and also from your consultant
Treadwell and Rollo, Inc. (Treadwell) dated January 13, 1992 and
February 26, 1992.

Site 3

The above reports describe measures taken to address contamination at
the former underground storage tank location on the corner of 21st and
Webster Streets (site 3). The February 26, 1992 report describes the
completion of one six inch boring at the location of the former diesel
tank excavation. The boring was advanced to a depth of 24.8 feet,
groundwater was encountered at 23.0 feet depth. A grab ground water
sample was collected. Laboratory results indicated non detectable
levels for Petroleum Hydrocarbons as kerosene, diesel, benzene,
toluene, xylene, and ethylbenzene.

The January 13, 1992 correspondence from Treadwell stated that
hydrocarbons detected in samples collected during the tank removal
were all found in fill soil and that no hydrocarbons in concentrations
greater than 100 milligrams per kilogram were detected in native soil.
Since levels of contamination in native soil did not exceed 100 ppm
the requirement for the installation for ground water monitoring well
installation at site 3 is hereby withdrawn by this Agency.

Site 1

The February 26, 1992 correspondence from Treadwell documents the
sampling which occurred in 5 locations beneath the piping closed in
place beneath the parking structure at the Kaiser facility.
Analytical results for sample P-1 and P-2 indicated soil contamination
of 230 and 330 parts per million (ppm) of Total Petroleum Hydrocarbons
as gasoline (TPHg) and benzene concentrations of 0.05 and 4.0 ppm
respectively.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RD911

January 7, 1992

Ms. Deborah A. Boyer
Kaiser Center
300 Lakeside Drive
Suite 2685
Oakland, CA 94612

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 203
Oakland, CA 94621
(415)

Re: Underground Storage Tank Removal/ Replacement and Site
Remediation at Kaiser Center Oakland, 300 Lakeside Dr., Oakland
CA 94612

Dear Ms. Boyer:

This letter is a follow up to the meeting which occurred on November 20, 1991 with yourself, Christoph Jennings of Treadwell and Associates, Eddy So of the San Francisco Regional Water Quality Control Board (RWQCB) and myself. The purpose of the meeting was to discuss a strategy in addressing the environmental concerns at three former underground storage tank sites at the Kaiser Center located in Oakland.

Before a work plan was prepared, I met with your consultant Chris Jennings and shared with him my concerns pertaining to the work needed based on the contamination which was encountered at each location. One of the points I made to him during this initial meeting was the need to install a monitoring well at site 3 located at the corner of 21st and Webster Streets.

A Work Plan was subsequently developed by Treadwell and Associates dated November 10, 1991. The work plan outlined additional proposed site investigation measures for two of the three former underground storage tank areas.

After reviewing the Work Plan, in a telephone conversation with Chris, I again shared the comments I had regarding the deficiencies which I perceived in his proposal. I again reiterated the requirement for the installation of a monitoring well associated with Site 3 in order to indicate whether significant impact to groundwater had occurred associated with the soil contamination encountered in soil beneath the former underground storage tank at the site.

At Chris's request I contacted Eddy So with the RWQCB to verify my understanding of the guidance document the Tri-Regional Staff Recommendations for Preliminary Evaluation and Investigation Underground Storage Tank Sites, August 1990. Eddy concurred that according to the above document a soil/groundwater investigation is required if the following conditions are found ... the concentration of either total petroleum hydrocarbon and /or total oil and grease are greater than 100 ppm in soil samples within the first two feet of native soil beneath the tank (and I would also infer beneath the former pipeline).

Ms. Boyer
January 7, 1992.
page 2 of 3

Chris argued that this was unreasonable and that Site 3 did not fall into this category and requested a meeting to convey his case to both yourself, the RWQCB and myself. During the meeting, after hearing out Chris's argument and after considerable discussion, both Edy and myself attempted to direct both you and Chris to a viable solution to the monitoring well issue. The options specified at the conclusion of the meeting were the choice of two. These were to either install a monitoring well within 10 feet in the verified downgradient direction of the former contamination at Site 3 or to install a number of borings borings to the depth of the groundwater in order to collect both soil and groundwater grab samples.

Since the time of the meeting I noticed that one boring has been installed at Site 3 in the approximate middle of the former tank excavation. As discussed our November 20, 1991 meeting the installation of a single boring is unacceptable with both the RWQCB and this Agency.

As you should be aware, the RWQCB is charged with the authority by the Porter Cologne Act to protect the quality of the waters of the State and the County is the local oversight Agency for any subsurface investigation and cleanup activities associated with underground storage tanks. It is our directive to you that a diligent approach should be taken in defining the groundwater problem, if one exists at the above site. The purpose of our meeting was to resolve the disagreements between your consultant and the County regarding what types of additional investigation are required. With consideration given to the stand point of you and your consultant, based upon the directives given to you by this Agency and the RWQCB, your response to our directive by the installation of an unapproved single boring at Site 3 indicates that you have chosen to implement a remedial approach which is contrary to regulatory recommendation or approval.

To accomplish the goal of defining the groundwater problem you are hereby required to either install three borings or a monitoring well as specified above.

Comments regarding Site 1

The Treadwell and Associates Work Plan proposes that an additional well be installed to the south east of the former location of four underground storage tanks. The proposal also specifies the resumption and initiation of quarterly monitoring data from the existing and proposed monitoring wells. The analyses proposed were for Total Petroleum Hydrocarbons as gasoline (TPHG), Total Petroleum Hydrocarbons as diesel (TPHD) and benzene, toluene, xylene and ethylbenzene (BTXE).

In our November 20, 1991 meeting it was discussed that since pipeline samples from the former dispensers (which ran the length of the parking structure) had still not been performed the need for additional well requirements in site one would be dependent on these sampling results. The November 21, 1991 the work plan made no mention of the collection of pipeline samples in site 1.

Ms. Beyer
January 7, 1992
page 3 of 3

Upon review of the initial January 31, 1991 report prepared by Treadwell and Associates it was noted that "in 1975 a leak reportedly developed in the gasoline piping systems for three of the four tanks. Based upon this information you are required to submit to this office a revised more aggressive sampling proposal for all piping left in place associated with the former underground storage tanks. This request is at variance with the initial approval letter issued by this Department, dated May 3, 1991 because at the time which I wrote that particular approval letter I was unaware of the above information.

1) You are required to place a boring around the east wall of the parking structure where a leak was previously detected.

2) As specified in the May correspondence from this office, you are required to analyze all soil samples for the presence of TPHg, TPHd, BTEX and total lead.

You are required to submit a Work Plan to this office for approval prior to implementation outlining the measures to adequately address the sampling beneath the pipelines beneath the parking structure at Site One and also to address the measures proposed to determine the impact to groundwater at Site Three within 30 days of the receipt of this letter.

If you have any questions please feel free to contact me at (510) 271-4320.

Sincerely,

Paul M. Smith

Paul M. Smith
Hazardous Materials Specialist

- cc: Christoph R. Jennings, Treadwell & Associates
- Eddy So, RWQCB
- Gil Jensen, Alameda County District Attorney's Office of Consumer and Environmental Affairs Office
- John Soldering, Deputy Director Public Works, City of Oakland

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0911

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

May 3, 1991

Ms. Deborah A. Boyer
Kaiser Center
300 Lakeside Drive
Suite 2685
Oakland, CA 94612

**Re: Underground Storage Tank Removal/ Replacement and Site
Remediation at Kaiser Center Oakland , 300 Lakeside Dr., Oakland
CA 94612**

Dear Ms. Boyer,

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed the Site Assessment Proposal for the removal of six underground storage tanks (ust) and subsequent installation of one ust at the above site.

Specifically, the workplan addresses the removal of four usts located in the inner drive area and the additional excavation of contaminated soil. Two usts in separate areas will be also be removed.

The issue of underground piping addressed in a letter dated April 15, 1991 from Chris Jennings of Treadwell & Associates Inc. proposes to triple rinse, pressure grout and to cap an unspecified length of piping located beneath the Kaiser four story parking structure. However, the issue of soil sampling beneath the piping has not been addressed.

You are requested to perform soil sampling beneath the underground piping in the location of the former gas dispenser of each product type, underneath the pipe at each 90 degree bend and at 2 points throughout the length of the piping. You are requested to perform chemical analysis for TPH(g) and BTE&X. When performing analysis of the pipeline sample(s) taken from underneath the gas dispenser(s) you are also requested to sample for the presence of Total Lead

The proposed workplan for the underground tank removals is acceptable with the inclusion of the above pipeline sampling criteria. Please acknowledge the above recommendations prior to implementation of the above work. A tank closure report identifying initial soil and groundwater contamination levels and also soil and groundwater levels following over excavation, manifests for usts and soil transported off-site, and other related documentation is anticipated following the ust removals.

Ms. Boyer
May 3, 1991
page 2 of 2

If you have any questions please feel free to contact me at (415)
271-4320.

Sincerely,

Paul M. Smith

Paul M. Smith
Hazardous Materials Specialist

cc:

Christoph R. Jennings, Treadwell & Associates
Lester Feldman, RWQCB
Christine Meyers, Oakland Fire Dept.
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Affairs Office
John Soldering, Deputy Director Public Works, City of Oakland