AGENCY DAVID J. KEARS, Agency Director

R0#920

RAFAT A. SHAHID, Assistant Agency Director

January 16, 1996 StID # 3512

Mr. John Yandell Yandell Truckaway 563 Julie Ann Way Oakland CA 94621 Alameda County CC4580 Environmental Health Services 1131 Harbor Bay Pkwy., #250 Alameda CA 94502-6577 (510)567-6700 FAX (510)337-9335

Re: Revised Boring Locations for the Soil and Groundwater Investigation at 563 Julie Ann Way, Oakland 94621

Dear Mr. Yandell:

After our November 22, 1995 meeting with your consultant, we decided that the best course of action would be to discuss your site with my colleagues to see what, if any, additional work would be necessary for their concurrence for recommendation for site closure. After internal review, it was determined that you would need to verify the limits of soil and groundwater contamination in the area of boring B5. Should contamination be shown to be limited in extent, site closure could then be recommended to the Water Board.

I discussed the specifics of the additional site assessment with Mr. Terrance Carter of CET Environmental. He subsequently submitted a December 13, 1995 revised work plan slightly modifying the original (dated October 26, 1995). The locations of borings were slightly changed to reflect the County recommendations. With the condition that all other items of the October 26, 1995 work plan being the same ie both soil and groundwater samples will be taken for chemical analysis, the work plan is acceptable.

Please contact me at least 48 working hours prior to your field work. I may be reached at (510) 567-6765.

Sincerely,

Barney M Cham

Barney M. Chan

Hazardous Materials Specialist

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c: Mr. T. Carter, CET Environmental, 5845 Doyle St., Suite 104, Emeryville, CA 94608

G. Coleman, files

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DAVID J. KEARS, Agency Director

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RAFAT A. SHAHID, Director

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

August 21, 1995 StID # 3512

Mr. John Yandell Yandell Trucking 563 Julie Ann Way Oakland CA 94621

Re: Comment on July 24, 1995 Semi-Annual 1995 Groundwater Monitoring Report and Risk-Based Corrective Action Assessment for Yandell Truking, 563 Julie Ann Way, 94621.

Dear Mr. Yandell:

Our office has received and reviewed the above referenced report as prepared by your consultant, CET Environmental Services, Inc. This report gives groundwater monitoring results for the 3/15/95 sampling event and also provides a risk-based corrective action assessment for concentrations of diesel fuel observed in samples from boring B-5. Based on this analysis, this report recommends no further work and site closure.

First, I would like to clarify how and when the risk based evaluation per ASTM ES-38 is appropriate. To do this I would like to reintroduce the term Non-Attainment Area (NAA). As you may recall, this term refers to areas where specific conditions exist which the Water Board through professional experience agrees that natural biodegradation and institution of a monitoring program is the most reasonable and cost effective remedial approach. The Water Board has further divided these NAA sites into Category I, those which have ground water pollution and residual soil pollution with limited water quality, environmental and human health risks and Category II, those where the approved cleanup program has not resulted in compliance with water quality objectives. Yandell Trucking would fall into Category I.

Those Category I sites must also adequately address the following four criteria:

- a. The discharger has demonstrated that no significant pollutant migration will occur;
- b. Adequate source removal and/or isolation is undertaken to limit future migration of pollutants to ground water;
- c. Dissolved phase cleanup is not cost-effective and human health risks and separate phases have been or are actively being removed; and

Mr. J. Yandell StID # 3512 563 Julie Ann Way August 21, 1995 Page 2.

d. An acceptable plan is submitted and implemented for containing and managing the remaining human health, water quality and environmental risks, if any. This plan should include an assessment of human health and environmental risks, management measures and contingency options.

As you can see, under criteria (d) is where your risk-based corrective action assessment would be required.

Specifically, for this site, we should analyze whether all of the above conditions have been met. Based on the presence of significant soil and groundwater contamination detected in boring B-5, downgradient to the original tank pit, it has not been shown that pollutant migration will not occur. On the contrary, it appears that pollutant migration has occurred. Secondly, it has not been shown that adequate source removal has occurred in the groundwater. Though overexcavation of the tank pit has removed most of the diesel and gasoline soil contamination, significant diesel contamination exists in the groundwater and in the saturated soil in the soil/groundwater interface. The highly contaminated soils in the vadose and capillary fringe should be removed, treated or contained to the maximum extent possible to minimize continued leaching to groundwater.

NAA requires "containment" and "no significant migration" past designated monitoring points. Monitoring over a established period of time should verify that these conditions have been met.

Finally, risk management measures such as deed notification/restrictions, health and safety plan, utility workers notification and contingency options will also need to be addressed.

The question which needs to be addressed is what additional work will be necessary to meet the NAA requirement?
Our office cannot make any specific recommendations rather we shall list our concerns for your response.

#### Concerns:

1. Though there is evidence that this site is underlain with fill material and that oil and grease/motor oil may have come from contaminated fill, the presence of "oily" substances in B4 and B5 needs to be addressed. Does this oil leach to groundwater? Does this oil contribute to the significant diesel contamination? Should these "hot spots" be remediated?

Mr. J. Yandell StID # 3512 563 Julie Ann Way August 21, 1995 Page 3.

What does this oil contain other than the generic oil and grease? If it is a health concern then it must be included in your risk assessment, health and safety plan for utility workers and deed notice/deed restriction.

2. The site has not been totally characterized both in the up and downgradient directions. Soil and/or groundwater contamination was detected in both borings B4 and B5. In order to show containment of the plume, permanent monitoring well(s) will need to be installed and monitored.

The risk assessment performed does have its merits and still may be used when the conditions of NAA have been met. Keep in mind that both human health and environmental health are of County concern and that the risk assessment only addresses the human health issue.

It is regrettable that you were under the impression that the risk assessment would be the only requirement for site closure recommendation. My notes from this meeting state that based on the contamination found in boring B5 additional soil and groundwater investigation would be necessary. I approved changing the monitoring schedule for wells MW1-3 provided additional wells are installed. I also recommended reviewing the concentration of soil and groundwater contamination in boring B5 versus the ASTM screening levels and suggested that an additional survey method should be done prior to installing permanent well(s).

Please submit your written comments and a work plan for further site characterization to our office within 60 days or by October 21, 1995. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan

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Hazardous Materials Specialist

cc: T. Carter, CET Environmental Services Inc.,5845 Doyle St., Suite 104, Emeryville, CA 94608

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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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DAVID J. KEARS, Agency Director

November 2, 1994 StID # 3512

Mr. John Yandell Yandell Trucking 563 Julie Ann Way Oakland CA 94621 DEPARTMENT OF ENVIRONMENTAL HEALTH

Alameda County Health Care Services Agency Dept. Of Environmental Health 1131 Harbor Bay Pkwy 2nd Flr. Alameda Ca 94502-6577

Re: Comment on October 24, 1994 Groundwater Investigation Work Plan for Yandell Trucking, 563 Julie Ann Way, Oakland 94621

Dear Mr. Yandell,

Our office has received and reviewed the above referenced work plan as prepared and submitted by your consultant, CET Environmental Services (CET). As you may recall, the work plan calls for the installation of three temporary well points in order to sample soil and groundwater. The motive of this investigation is to verify the limited extent of soil and groundwater contamination due to the release from the former underground tanks at this site.

We have previously discussed the applicability of the Non-Attainment policy for this site. This policy recognizes that localized contamination in impermeable sediments often naturally biodegrade and are limited in areal extent. This investigation intends to verify this belief for your site.

Upon review of this work plan, our office agrees with the approach and work should proceed with the following conditions:

1. Please continue to monitor the existing wells on a quarterly basis. Your monitoring reports should be sent to our office no more than 45 days after the sampling date. Due to the prior monitoring results, you may change the analytes sought to:

MW1- TPHmo, TPHd, TPHg and BTEX MW2- no analytes required MW3- TPHmo, TPHd, TPHg and BTEX.

- 2. Please consider moving the location of boring B4 to the extreme northern point of this site. This recommendation is based on the previous analytical results of boring B1.
- 3. Please insure that at least one soil sample is analyzed from each boring. Lacking any field data indicating obvious soil contamination, you should sample soil at the soil/groundwater interface. In addition, please add TPH as mo to your list of analytes.

Mr. John Yandell StID # 3512 563 Julie Ann Way November 2, 1994 Page 2.

4. Your report detailing the results of this investigation is due within 60 days of completion of your field work. Please contact our office at least 48 hours prior to your field work should we be able to witness these activities.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

cc: Mr. T. Carter, CET Environmental Services, 5845 Doyle St., #104, Emeryville, CA 94608

E. Howell, files

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DAVID J. KEARS, Agency Director

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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 9, 1994 stID # 3512

Mr. John Yandell Jr. Yandell Trucking 563 Julie Ann Way Oakland CA 94621

Re: Status of Subsurface Investigation at 563 Julie Ann Way, Oakland CA 94621

Dear Mr. Yandell,

Our office has reviewed the third and fourth quarter monitoring reports for the above site. It appears that although gasoline and BTEX constituents are low and not of current concern, the extent of the diesel and motor oil contamination in groundwater is still undetermined. If we are to consider this site where we rely solely on natural bioremediation, the full extent of soil and groundwater contamination must be determined at this site.

Note that the grab groundwater sample from boring B1 and the results of water samples from MW1 indicate elevated levels of dissolved diesel and motor oil. Certainly, you may continue to monitor this site to see what trends exist in the groundwater, but be aware that on-going monitoring will be required and no recommendation for site closure can be made given the uncertainty of the hydrocarbon contaminant plume. The March 2, 1994 CET report states that after four consecutive quarters of monitoring further recommendations will be made. Please include your alternatives of choice in your next quarterly report.

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

Sincerely,

Barney M. Chan

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Hazardous Materials Specialist

cc: T. Carter, CET Environmental Services, Inc., 5845 Doyle St., Suite 104, Emeryville, CA 94608

E. Howell, files

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DAVID J. KEARS, Agency Director

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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
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80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

October 21, 1993 StID # 3512

Mr. John Yandell Jr. Yandell Trucking 563 Julie Ann Way Oakland CA 94621

Re: Comment on October 7, 1993 Report on Groundwater Monitoring and Soil Boring Investigation Results for Yandell Trucking, 563 Julie Ann Way, Oakland CA 94621

Dear Mr. Yandell:

Our office has received and reviewed the above referenced technical report prepared by your consultant, CET Environmental Services, Inc. Recall, this report sampled and analyzed the three existing monitoring wells and advanced two borings while sampling both soil and groundwater from these borings. The intent of the borings were to determine the potential of contaminated fill material existing throughout the site and to help determine the extent of soil and groundwater contamination.

The results from borings B1 and B2 did not indicate contaminated fill throughout the site. Therefore, the motor oil contamination reported in the previous MEC report appears to be localized around the former tank pit. Elevated dissolved gasoline, diesel and motor oil were found in the downgradient wells, MW1 and MW3, and also in the water sample from boring, B1.

Your consultant recommends the advancing of additional borings to determine the extent of the shallow soil and groundwater contamination. Our office agrees that this work should be performed. Be aware that soil overexcavation may necessitate the destruction of the two downgradient wells and the installation of replacement wells. I have spoken with Mr. Mark Lafferty of CET and verbally concurred with their approach for further investigation. As such, you should provide our office a work plan addendum for this site within 45 days or by December 6, 1993. Please contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan, Hazardous Materials Specialist

cc: M. Flaherty, CET Env. Services, Inc., 2950 Buskirk Ave., Suite 120, Walnut Creek, CA 94596-2079

E. Howell, files

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R0920 RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DAVID J. KEARS, 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

May 19, 1993 StID # 3512

Mr. John Yandell Sr. and James Russi TR Yandell Trucking 563 Julie Ann Way Oakland CA 94621

Re: Comment on May 10, 1993 Groundwater Monitoring Well Installation Report for 563 Julie Ann Way, Oakland 94621

Dear Mr. Yandell:

This letter serves to summarize conversations I had today with you and Mr. Benjamin Berman of Aqua Terra Technologies (ATT). Upon review of the above referenced report, several things are apparent. One is the possibility of motor oil or oil and grease background contamination on this site. These contaminants were found in the soil samples taken from monitoring wells 1-3 and in their groundwater samples. There is evidence that this contamination could be from backfilled materials. Our office believes that this possibility should be investigated with additional borings and groundwater sampling. These borings should be at agreed upon locations which would represent "background" locations. It may be possible to use these borings to determine the extent of the diesel contaminant plume.

It was noted that non-detectable concentrations of gasoline, diesel and BTEX were found in the soil samples from monitoring wells 1-3 and only diesel was found in the groundwater samplings in addition to the oil and grease. It appears then that the lateral extent of gasoline and diesel contamination has been determined.

Groundwater monitoring should continue on a quarterly basis as recommended by ATT. You should analyze the water samples for gasoline, diesel, BTEX and TPH as motor oil. The other waste oil parameters recommended by ATT should not be analyzed at this time. To verify the "background" concentrations of motor oil, our office requests that you provide a work plan within 45 days. This work plan should include the installing at least two borings and analyzing the soil and grab groundwater samples for gasoline, diesel, BTEX and motor oil.

Mr. John Yandell StID # 3512 563 Julie Ann Way May 19, 1993 Page 2.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: R. Hiett, RWQCB

B. Berman, ATT, 2950 Buskirk Ave., Suite 120, Walnut Creek, CA, 94596-0418

E. Howell, files

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DAVID J. KEARS, Agency Director

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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 23, 1993 StID #3512

Mr. John Yandell Sr. and James Russi TR Yandell Trucking 563 Julie Ann Way Oakland CA 94621 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: Comment on Work Plan for Subsurface Investigation at 563 Julie Ann Way, Oakland CA 94621

Dear Mr. Yandell:

Our office has received and reviewed the March 15, 1993 work plan for subsurface investigation for the above site provided by Aqua Terra Technologies. This plan calls for the installation of three monitoring wells around the former excavation pit of the diesel and gasoline tanks.

It appears that there are three areas which may have residual petroleum hydrocarbon contamination. Those areas are identified by their overexcavation numbers, OX1, OX9 and OX10, which have identified gasoline, benzene and diesel contamination. Although these levels may not be hazardous, our office encourages the removal or remediation of soils in excess of 100 parts per million TPH (total petroleum hydrocarbons) and above the MCL (maximum contaminant level) for benzene.

The installation of three monitoring wells is acceptable as is their approximate locations as depicted on the work plan map. You may proceed as soon as possible. Please analyze the soil and groundwater samples from the monitoring wells for TPH as gasoline, as diesel and as motor oil, BTEX (benzene, toluene, ethylbenzene and xylenes) and for oil and grease by methods 5520F and 5520C for the soil and groundwater respectively. Any additional recommendations will be based on the results of the monitoring well installations.

Our office is concerned with the elevated levels of TPH as motor oil being found in soil samples around the former tank pit. All ten overexcavation soil samples taken from around the former tank pit contained elevated TPH as motor oil as high as 740 parts per million. There has been mention that these concentrations of motor oil could be "background" ie from contaminated fill materials used extensively throughout this area. Even if this motor oil does not impact the groundwater we would like some additional investigation done to prove this assertion. This could be in the form of historical records and/or additional borings on and offsite.

Mr. John Yandell March 23, 1993 StID #3512 563 Julie Ann Way Page 2.

Please inform our office 48 working hours in advance of the installation of the monitoring wells in the event I should be available to witness this activity. In addition, please provide a work plan to further investigate the origin and extent of the motor oil contamination at this site within 30 days of this letter.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

G. Jensen, Alameda County District Attorney Office

R. Hiett, RWQCB

Barney Wille

T. Carter, ATT, 2950 Buskirk Ave., Suite 120, Walnut Creek, CA 94596-2079

E. Howell, files

WP-563



DAVID J. KEARS, Agency Director

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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

December 28, 1992

Mssrs. John Yandell Sr. and James Russi Yandell Trucking 563 Julie Ann Way Oakland CA 94621

Re: Completion of State Forms A and B.

#### Dear Sirs:

In order to complete the State Water Board Records regarding the underground tanks formerly at 563 Julie Ann Way, you are required to fill out the enclosed forms A and B, one form A per site and one form B for each individual tank removed. I have attempted to complete the forms using information available in our office. Please review the forms for accuracy and completeness, modify or add to the information, sign in appropriate location and return to our agency. Additional blank forms are supplied in the event that the information supplied is totally erroneous.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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cc: E. Howell, files

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Forms-Yandell

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DAVID J. KEARS, Agency Director

December 17, 1992 STID # 3512 DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
TR
Oakland, CA 94621
(510) 271-4530

RAFAT A. SHAHID, ASST, AGENCY DIRECTOR

Mr. John W. Yandell Sr. and James F. Russi TR Yandell Trucking 563 Julie Ann Way Oakland CA 94621

Re: Request for Work Plan for Subsurface Investigation at Yandell Trucking, 563 Julie Ann Way, Oakland CA 94621

Dear Mssrs. Yandell and Russi:

Please be advised that the oversight of the remediation at the above site has been transferred to the Local Oversight Program, (LOP), section of Alameda County Hazardous Materials Division. You have been made aware of this through a Notice of Requirement to Reimburse letter recently sent to you. Also, the case worker is the undersigned, Hazardous Materials Specialist.

Our office has received and reviewed the January 23, 1992 tank closure report prepared for you by Miller Environmental Company. As you are aware, considerable Total Petroleum Hydrocarbons as diesel and as gasoline (TPHd and TPHg) was found in the soil. samples originally taken around the excavation pit. extensive overexcavation, most of the TPHg and TPHd was removed from the soil but significant TPH as motor oil, TPHmo, was found. After pumping out the water from the excavation pit, a recharged water sample, EX-W, showed contamination of total oil and grease, TOG and TPHd and TPHg. Because of the soil and groundwater contamination found, you are required to perform a subsurface investigation which determines the extent of the soil and groundwater contamination. Enclosed please find a copy of Appendix A, Workplan for Initial Subsurface Investigation, a document provided by the Regional Water Quality Control Board (RWQCB) which you may use as a quide for your workplan for the subsurface investigation. Please provide a work plan for this investigation within 45 days of receipt of this letter.

You should consider this a formal request for technical reports pursuant to the Californin Water Code Section 13267 (b). All work plans, analytical results or reports should be sent to our office and to that of the RWQCB to the attention of Mr. Rich Hiett. Their address is 2101 Webster St., Suite 500, Oakland CA 94612. Be aware that failure to submit the requested documents may subject you to civil liabilities.

Mssrs. Yandell and Russi STID 3512 Yandell Trucking 563 Julie Ann Way December 17, 1992 Page 2.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

enclosure (Mssrs. Yandell and Russi)

cc: G. Jensen, Alameda County District Attorney Office

R. Hiett, RWQCB E. Howell, files

WP-563Julie