ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

R0956

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 3, 1993
StID# 4440

Mr. Roy Hatton
22985 Valley View Dr.
Hayward CA 94541

Re: Evaluation of 752 High St., Oakland CA 94601 for Site Closure

Dear Mr. Hatton:

Recently, I spoke with Mr. John Bacon regarding the status of 744 High St. In this conversation, we also discussed the status of 752 High St., the former dry cleaning plant where four underground tanks were removed in 1989. Mr. Bacon said he believed that our office had already referred this site to the Regional Water Quality Control Board (RWQCB) for case closure. I told him that I would look into this and clarify its status, since the RWQCB had yet to offer an opinion on our office's recommendation.

Upon review of the files, I found the April 25, 1991 letter from Ms. Cynthia Chapman of our office to Mr. Lester Feldman of the RWQCB recommending the site for case closure. I am currently overseeing hydrocarbon released from underground tanks in this area and I am familiar with the Exxon station immediately adjacent to this property. Two wells, MW9 and MW10, on the Exxon site, were used by your consultant as downgradient wells in order to determine the extent of groundwater contamination from 752 High St. Since April 1991, additional information regarding the Exxon site has been provided. This includes the installation of monitoring well MW-14, which is more downgradient to the former 752 High St. tanks than are MW9 and MW10. You may be aware, a 10 foot deep soil sample from boring B14, located near MW-14, contained 3400 parts per million (ppm) gasoline, 1900 ppm diesel and 820 ppm oil and grease. Groundwater samples from MW-14 have contained significant gasoline and diesel since its installation. In the latest December 1992 monitoring event, 0.35 ppm gasoline and 0.22 ppm diesel were found in MW-14. Due to these results and other inconsistencies, our office must reopen this case for further review. This case has been transferred to the Local Oversight Program (LOP) section of the County's Hazardous Materials Division. You and Mr. Bacon have been notified of this through a **Notice of Requirement for Reimbursement** letter recently sent to you.

The re-evaluation of this site will facilitate the review and eventual concurrence for recommendation for case closure by the RWQCB. Please note that the April 25, 1991 letter stated that if conditions change or a water quality threat is discovered at the site further work would be required. This seems to be the case now.

The following "inconsistencies" were observed and discussed at length with Mr. Mark Armstrong of Earth Metrics. I would like to comment that the recommendation made by Earth Metrics were consistent with the information available at that time. Nevertheless, the following items must be resolved prior to recommendation for case closure:

1. There has been varying contents reported for the tanks removed from the site. Stoddard solvent, waste stoddard solvent and bunker C have been mentioned. This information is important in determining the correct analyses for soil and groundwater samples. Total petroleum hydrocarbons as gasoline and as diesel, BTEX and total hydrocarbon oil and grease should be run to determine the full extent of contamination at or from this site.

2. All confirmation soil samples from overexcavation of the two pits were taken from the sidewalls and analyzed for high boiling point hydrocarbons (diesel). This is not the correct analysis for stoddard solvent. It should be run specifically for stoddard solvent or total petroleum hydrocarbons as gasoline (TPHg). In addition, no floor samples were run from the excavation pit and therefore the extent of vertical contamination is unclear. It should be noted that B-14 at the 10 foot depth showed elevated gasoline, diesel and oil and grease contamination while the side wall pit samples from 8 foot depth showed low contamination for diesel. The extent of stoddard solvent and oil and grease contamination is uncertain since these parameters were not run on the sidewall confirmation samples.

3. As previously mentioned, MW9 and MW10 the two off-site wells used by your consultant, are at best cross gradient to the former 752 High St. tanks and MW-14 is the best downgradient well. This is according to the gradient being found at the Exxon site, which has been fairly consistently southwest (towards MW-14). Certainly, MW9 and MW10 can be used to determine the extent of groundwater contamination from your site but MW14 should be used as the downgradient well.

4. The contamination on and off site must be determined and possibly remediated. One approach would be a co-operative program with Exxon consisting of monitoring and remediation. You will need an agreement as to the extent of liability which you and Exxon will assume for the contamination being found in the soil and groundwater near MW-14. Even though continual monitoring is being performed by Exxon, your site will not be eligible for case closure referral to the RWQCB without further investigation. I encourage you to contact Ms. Marla Guensler of Exxon at (510) 246-8776 and arrange some settlement of liability and future work in the area near the former tank pits.

Please consider the above items and let me know what steps you intend to take to resolve this situation. You may contact me at (510) 271-4530.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: R. Hiett, RWQCB
M. Armstrong, Earth Metrics Inc., 7000 Marina Blvd., 4th Floor, Brisbane, CA 94005
M. Guensler, Exxon Company, USA, Post Office Box 4032, Concord, CA 94524-2032
J. Bacon, Eureka Management Corp., P.O. Box 184, South San Francisco, CA 94080
E. Howell, files

752High

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

R0956

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

April 25, 1991

Mr. Lester Feldman
Regional Water Quality Control Board
2101 Webster Street, 5th Floor
Oakland, CA 94612

RE: Recommendation for case closure at the Hatton Property, 752 High Street, Oakland

Dear Mr. Feldman:

Our office has reviewed the reports submitted by Earth Metrics, Inc., for an underground tank removal investigation at the above referenced site. We recommend that the Board consider this site for case closure. The following is a description of the activities that have occurred at the site, based on the Earth Metric reports.

Site history indicates that a laundry and drycleaning plant existed here for a number of years. At the time of the tank removal, the facility operated as Ed's Auto Parts, a parts salvage business. There was resultant oil & grease surface contamination from the associated activities. In January 1989, 13 shallow soil borings were drilled, ranging in depth from one to five feet. Samples were analyzed for oil & grease and had values that ranged from 15,000 ppm at the surface to ND at 5 feet below the surface.

In March 1989, three 3,000 gallon steel underground storage tanks were removed from this facility. These three tanks were installed vertically and had flat tops and cone-shaped bottoms. The Hazardous Materials Specialist observed that two of these tanks had holes at the tips of the cones. A smaller underground redwood tank, at a different location on the property lot was also removed. The information indicates that the three 3,000 gallon tanks stored stoddard solvent and the redwood tank had stored used stoddard solvent. Tank pit samples were analyzed for BTEX, Oil & Grease, TPH as diesel, and stoddard solvent. Diesel was detected with a high value of 13,000 ppm, stoddard solvent had a high value of 500 ppm, and oil & grease and BTEX values were below detection. The pit was further excavated. An Underground Storage Tank Unauthorized Release Report was completed for the site on March 8, 1989, which stated that the substances involved were "Stoddard Solvent and Burner Fuel-Bunker C Type."

In 1990, Earth Metrics did additional pit sampling, pumped out 1,500 gallons of water, and characterized the stockpiled soils for diesel and oil & grease to determine if the soil could be reused onsite. The stockpiles were spread out over the site and bio-remediated to below 10 ppm for both diesel and oil & grease. The bioremediation activities have occurred from October 1990 to March 1991. The tank pit samples had TPH values of below 100 ppm.

No groundwater monitoring wells have been installed on this property. However, it is immediately upgradient of a former EXXON station at 720 High Street, and there are two upgradient wells at this EXXON station. One of the wells was sampled in May 1988, and all wells have been sampled in December 1989, April 1990, July 1990, and November 1990. Constituents analyzed for are TPH as gasoline and diesel, and BTEX. The last three sampling events have been non-detect for all constituents, and the 1988 sampling also had non-detect values. The 1989 results showed a high value of TPH as gasoline at 0.32 ppm, and benzene at 0.0059 ppm. On the downgradient side of 720 High Street, floating product has been found.

Based on the review of the information made available to the Division, this agency is satisfied that the data from 720 High Street indicates that no groundwater quality problem is associated with 752 High Street. We also realize that if conditions change or a water quality threat is discovered at the site further work would be required.

If you have any questions, feel free to call me at 415/271-4320.

Sincerely,

Cynthia Chapman

Cynthia Chapman
Hazardous Materials Specialist

c: Mr. & Mrs. Roy Hatton
Mr. Mark Armstrong, Earth Metrics, Inc.

OR

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

R0956

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

Certified Mail # P 062 128 081

September 15, 1989

Mr. Roy Hatten
22985 Valley View Dr.
Oakland, CA 94611

Subject: Unauthorized Release
Removal of Underground Fuel, Stoddard, and Waste Oil Tanks
752 High Street
Oakland, CA 94601

Dear Mr. Hatten:

Thank you for submitting the results for analysis of subsurface soil and ground water samples taken in response to the underground tank removals from the above shown facility. Because of the degree of contamination found, this facility is considered to have experienced a confirmed release of petroleum hydrocarbons that has impacted subsurface soil and ground water. The extent of this contamination must be assessed and remediated.

Our office will be the lead agency overseeing both the soil and groundwater remediation of this site. The Regional Water Quality Control Board (RWQCB) is currently unable to oversee the large number of contamination cases within Alameda County and has delegated the handling of this case to our Division. We will be in contact with the RWQCB in order to provide you with guidance concerning the RWQCB's remediation requirements. However, please be aware that you are responsible for diligent actions to protect waters of the State.

To complete contaminant assessment and begin remediation, we require that you submit a work plan which, at a minimum, addresses the items listed below and presents a timetable for their completion. Please submit this workplan within 30 days of the date of this letter.

I. Introduction

A. Statement of scope of work
B. Site map showing location of past underground storage tanks
C. Site History
- provide historical site use and ownership information. Include a description of types and locations of hazardous materials used on site.

II. Site Description

A. Vicinity description including hydrogeologic setting
B. Initial soil contamination and excavation results
- provide sampling procedures used
- indicate depth to ground water
- describe soil strata encountered
- provide soil sampling results, sampling map, chain of custody forms, identity of sampler
- describe methods for storing and disposal of all soils
- provide TOG and 8240/8010&8020 results for waste oil pit samples.

III. Plan for determining extent of soil contamination on site

A. Describe approach to determine extent of lateral and vertical contamination
- identify subcontractors, if any
- identify methods or techniques used for analysis
- provide sampling map showing all lines of excavation and sampling points
- if a step out procedure is used, define action level for determination of "clean" isopleth
- provide chain of custody forms, lab analysis results, all receipts and manifests, & identity of sampler

B. Describe method and criteria for screening clean versus contaminated soil. If onsite soil aeration/bioremediation is to be utilized, then provide a complete description of method that includes:

- volume and rate of aeration/turning
- method of containment and cover
- wet weather contingency plans
- permits obtained
- composite sample results, 1 per 50 cubic yards

C. Describe security measures

IV. Plan for determining ground water contamination

- Construction and placement of wells should adhere to the requirements of the "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks". Provide a description of placement and rationale for the location of monitoring wells including a map to scale.

- The placement and number of wells must be able to determine the extent and magnitude of the free product and dissolved product plumes.

A. Drilling method for construction of monitoring wells

- expected depth and diameter of monitoring wells
- date of expected drilling
- casing type, diameter, screen interval, and pack and slot sizing techniques
- depth and type of seal
- development method and criteria for adequacy of development
- plans for cuttings and development water

B. Ground water sampling plan

- method for free product measurement, observation of sheen
- well purging procedures
- sample collection procedures
- chain of custody procedures
- procedures for determining ground water gradient

D. Sampling schedule

- measure free product weekly for first month following well installation
- measure free product and dissolved constituents monthly for first three months.
- after first three months monitor quarterly.
- monitoring must occur a minimum of one year.

V. Provide a site safety plan

VI Development of a remediation Plan.

A. The remediation plan is to include a time schedule for remediation, and, at minimum, must address the following issues:

- removal of all free product. Manual bailing is not acceptable as a recovery system. Actual amount of free product removed must be monitored and tabulated.

- remediation of contaminated soils and dissolved constituents must follow RWQCB's resolution No. 68-16.

- soils containing 1,000+ ppm of hydrocarbons must be remediated. Soils containing between 100 and 1,000 ppm must be remediated unless sufficient evidence is provided which indicates no adverse effects on groundwater will occur. Clean up of soils to 100 ppm is strongly recommended.

- design of remedial action system should be based on a review of hydrogeologic and water quality data and on an evaluation of mitigation alternatives. The determination of probable capture zone(s) of extraction system(s) should be based on aquifer characteristics as determined by aquifer test data

VII Reporting

A. Technical reports should be submitted with a cover letter from the property owners. The letter must be signed by an owner or by an authorized representative of that person.

B. Monthly reports must be submitted for the next three months with the first report due 90 days from the above letter date.

C. Quarterly reports must be submitted with the first report due 90 days after the final monthly report. These reports should describe the status of the investigation and cleanup.

D. All reports and proposals must be signed by a California-Certified Engineering Geologist, California Registered Geologist or a California-Registered Civil Engineer (see page 2, 2 June 1988 RWQCB document). A statement of qualifications should be included in

all reports. Initial tank removal and soil sampling does not require such expertise; however, borehole and monitoring well installation and logging, and impact assessments do require such a professional.

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and RWQCB. You should be aware that this Division is working in conjunction with the RWQCB and that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a late response may result in referral of this case to the RWQCB for enforcement and may subject the property owners to civil liabilities imposed by the RWQCB to a maximum amount of $1,000 per day.

Should you have any questions concerning the contents of this letter or the status of this case please contact Ariu Levi, Hazardous Materials Specialist, at 415-271-4320.

Sincerely,

Edgar B. Howell Jr.

Rafat Shahid, Chief
Hazardous Materials Program

cc: Gil Jensen, Alameda County District Attorney, Consumer & Environmental Protection
Lester Feldman, RWQCB
Howard Hatayama, DOHS
Inspector Halyard, OFD
Jack Quarle, Contractor
Files