

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01127

RAFAT A. SHAHID, Director

August 18, 1995
STID 3681

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

Attn: Greg Shepherd
Southern Pacific Trans. Co.
One Market Plaza, Rm 1007
San Francisco CA 94105

RE: Southern Pacific site, 1912-7th St., Oakland CA 94607

Dear Mr. Shepherd,

Since my last letter to you regarding this site, dated 7/15/94, the following documents have been received in this office:

- 1) "Second Quarter 1994, Ground Water Monitoring Report," prepared by Industrial Compliance, dated 7/15/94
- 2) "Third Quarter 1994, Ground Water Monitoring Report," prepared by Industrial Compliance, dated 2/3/95
- 3) "Fourth Quarter 1994, Ground Water Monitoring Report," prepared by Industrial Compliance, dated 3/27/95
- 4) "First Quarter 1995, Ground Water Monitoring Report," prepared by Industrial Compliance, dated 6/8/95

Upon review of the most recent report, the request for a reduction in frequency in sampling (pg 23) was noted. **This request is acceptable.** *It would be most helpful to present such requests on the cover pages attached to future reports. This will bring the matter to my attention promptly; a request of this sort would be considered a higher priority than simply a quarterly monitoring report.*

If you have any questions, you may contact me directly at 510-567-6761.

Sincerely,

A handwritten signature in cursive script, appearing to read 'J. Eberle'.

Jennifer Eberle
Hazardous Materials Specialist

August 18, 1995
STID 3681
Attn: Greg Shepherd
page 2 of 2

cc: James Ackerman, Industrial Compliance, PO Box 24374, Oakland CA 94623-1374
Richard Bateman, Industrial Compliance, 9719 Lincoln Village Dr., suite 310, Sacramento
CA 94827
Leroy Todd/file

je.3681-C

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R01127

RAFAT A. SHAHID, Assistant Agency Director

July 15, 1994
STID 3681

Southern Pacific Trans. Co.
One Market Plaza, Rm 1007
San Francisco CA 94105
ATTN: Greg Shepherd

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

RE: 1912-7th St., Oakland CA 94607

Dear Mr. Shepherd,

PLEASE NOTE THAT OUR NEW ADDRESS IS 1131 HARBOR BAY PARKWAY, 2nd FLOOR, ALAMEDA CA 94502.

We are in receipt of the 7/8/94 letter from IC. This letter responds to my letter dated 5/9/94, which responds to IC's 5/4/94 letter, which responds to my 4/1/94 letter. These letters are written regarding the 3/17/94 "Soil Remediation and Ground Water Investigation Report," prepared by IC. A proposal was made in this report (page 49) to reuse stockpiled soils which are contaminated with concentrations of total lead ranging from 50 ppm to 350 ppm.

Your proposal to use the TCLP procedure as outlined in IC's 7/8/94 letter is acceptable on the condition that a total of nine discrete soil samples be analyzed individually, as opposed to composited.

If you have any questions, please contact me at 510-337-2866, 2865, 2864, or 9231. These are our new temporary phone numbers. Please notify me at least 3 business days in advance of field activities so that I may arrange to be onsite.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Jim Jensen, Industrial Compliance, 9719 Lincoln Village
Drive, Suite 310, Sacramento CA 94827
Kevin Graves, RWQCB
Ravi Aralanantham
Ed Howell/File

je 3681-B

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01127

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 9, 1994
STID 3681

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

Southern Pacific Trans. Co.
One Market Plaza, Rm 1007
San Francisco CA 94105
ATTN: Greg Shepherd

RE: 1912-7th St.
Oakland CA 94607

Dear Mr. Shepherd,

We are in receipt of the 5/5/94 letter faxed from IC. This letter responds to my letter dated 4/1/94. Both letters are written regarding the 3/17/94 "Soil Remediation and Ground Water Investigation Report," prepared by IC.

I would like to discuss the first point made in IC's 5/5/94 fax, regarding the resampling of stockpiled soils for lead. **These soils shall be resampled and analyzed for soluble lead using the Waste Extraction Test (WET). This will determine the leachability potential. Your proposal to reuse stockpiled soils will then be reassessed. The frequency for resampling will be one sample per 20 cubic yards, since the intent is to reuse the soil onsite. You must notify me at least 3 working days in advance of this and all other field activities. Please note that I will be on vacation between May 20 and 30, 1994. In my absence, please notify my supervisor, Tom Peacock, to arrange for another representative from this office to be onsite when you perform field work.**

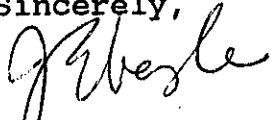
What is your intention in listing "soil action levels for lead" on page 2 of IC's 5/5/94 fax? We have not approved use of these levels for this site. The plan is to resample and analyze via the WET for lead. Please note that the "soil action level" mentioned in IC's 5/5/94 fax of 1,600 mg/kg is higher than the concentration which constitutes hazardous waste (1,000 mg/kg), as per Section 66261.24 of 22 CCR.

The second, third, and fourth points made in IC's 5/5/94 fax are acceptable.

Greg Shepherd
May 9, 1994
STID 3681
page 2 of 2

If you have any questions, please contact me at 510-271-4530.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Jim Jensen, Industrial Compliance, 9719 Lincoln Village
Drive, Suite 310, Sacramento CA 94827
Rich Hiett, RWQCB
Ravi Aralanantham
Ed Howell/File

je 3681-A

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RO1127

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

April 1, 1994
STID 3681

Southern Pacific Trans. Co.
One Market Plaza, Rm 1007
San Francisco CA 94105
ATTN: Greg Shepherd

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: 1912-7th St.
Oakland CA 94607

Dear Mr. Shepherd,

We are in receipt of the 3/17/94 "Soil Remediation and Ground Water INvestigation Report," prepared by IC. As you know, this report documents the overexcavation of soil in the former UST area to non-detectable (ND) concentrations. Five monitoring wells were installed, one of which was located in the former UST area (MW2). Soil was ND in the four monitoring wells surrounding the former UST. Soil in MW2 was not sampled because the pit was backfilled with clean fill. However, groundwater in MW2 had 23,000 ppb TPH-g and 410 ppb benzene. Groundwater in the four perimeter wells were ND except 0.7 ppb 1,2-DCA in MW4. The field blank was noted to contain 1.5 ppb 1,2-DCA. It appears that the groundwater plume is located in a limited area near the former UST.

The following issues arose upon review of this report; these issues were discussed between myself and Jim Jensen of IC on 3/23/94:

- 1) **Your proposal to reuse the stockpiled soil onsite is unacceptable at present, due to lead concentrations as high as 350 ppm (4-point composite sample). The stockpiled soil should be resampled for the Soluble Threshold Limit Concentration (STLC) using the Waste Extraction Test (WET). This will determine the leachability potential. Your proposal will then be reassessed. Jim Jensen and I discussed the possibility of resampling the stockpiled soil. In addition, Mr. Jensen requested more information concerning published "background" lead concentrations. I in turn requested this information from Dr. Ravi Arulanantham, who was unable to provide this data. (see page 49)**
- 2) **MW3 was not monitored for groundwater elevation (GWE) due to a parked car above it. It was not included in the survey. Please survey this well for future use in GWE and potentiometric map data. (see page 25)**

Greg Shepherd
April 1, 1994
STID 3681
page 2 of 2

- 3) Silver was identified in all four composite soil samples, rather than "in 3 out of 4 composite soil samples. . ." (see page 33)
- 4) It should be noted that the soils encountered in this investigation were not only "fine grained," as noted in section 6.2, but were also poorly graded sands, well graded sands, and silty sands, as per Figure 9.

If you have any questions, please contact me at 510-271-4530.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Jim Jensen, Industrial Compliance, 9719 Lincoln Village
Drive, Suite 310, Sacramento CA 94827
Rich Hiett, RWQCB
Ed Howell/File

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R01127

May 3, 1993
STID 3681

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

Southern Pacific Trans. Co.
One Market Plaza, Rm 1007
San Francisco CA 94105
ATTN: Greg Shepherd

RE: 1912-7th St.
Oakland CA 94607

Dear Mr. Shepherd,

Thank you for the "Soil Remediation and Investigation Workplan- Revised," dated 4/16/93, prepared by Industrial Compliance (IC). As you know, this workplan involves the excavation of soil with a hydrocarbon concentration greater than 100 ppm and benzene concentration greater than 18 ppm. Confirmatory soil samples will be collected and analyzed for TPH-g, TPH-d and BTEX. The impacted soil will be offhauled to a landfill. The existing monitoring well, BB-1, will be replaced, and four additional wells will be installed. Groundwater will be collected and analyzed for TPH-g, TPH-d and BTEX. A summary report will be completed, and then subsequent quarterly groundwater monitoring reports will be submitted.

This workplan is found acceptable; we request that field work begin within 30 days. Please note that quarterly groundwater monitoring will be necessary for a **minimum of one year**, at which time the case can be evaluated regarding further sampling. Assuming non-detectable soil concentrations, case closure is predicated on non-detectable groundwater results over the course of one year.

Our previous requests for a management proposal was to assess the threat of 18 ppm benzene in soil to groundwater, not human health. The current workplan includes 5 groundwater monitoring wells, which will serve to assess groundwater quality.

If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Mark Dockum, Industrial Compliance, 9719 Lincoln Village
Drive, Suite 310, Sacramento CA 94827
Rich Hiett, RWQCB
Ed Howell/File

je 3681-C

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01127

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 18, 1993
STID 3681

Southern Pacific Trans. Co.
One Market Plaza, Rm 1007
San Francisco CA 94105
ATTN: Greg Shepherd

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

NOTICE OF VIOLATION

RE: 1912-7th St.
Oakland CA 94607

Dear Mr. Shepherd,

This is our second request for a management proposal for residual soil and groundwater contamination at the above referenced site. Our first request was by letter dated 1/11/93. I have attached a copy of this letter for your information. [Please note that the letter was incorrectly dated 1/11/92.]

Therefore, we again request a management proposal within 30 days or by April 18, 1993.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Walter Floyd, Industrial Compliance, 9719 Lincoln Village
Drive, Suite 310, Sacramento CA 94827
Rich Hiett, RWQCB
Ed Howell/File

je

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01127

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

December 31, 1992

STID 3681

Southern Pacific Trans. Co.
One Market Plaza, Rm 1007
San Francisco CA 94105
Attn: Greg Shepherd

RE: 1912-7th St.
Oakland CA 94607

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

Dear Mr. Shepherd,

We have received a letter from Industrial Compliance (IC) dated 11/30/92 and the "Risk Assessment for Benzene-Containing Soil," prepared by IC, dated November 1992. The Risk Assessment was reviewed by Dr. Ravi Arulanantham of our Division. We concur with the report that there is no health threat to construction workers at this site. However, the residual soil and groundwater contamination must be properly managed. Management options should consider containment, deed restriction/notice, and long term monitoring. Therefore, we request that you submit a management proposal within 40 days or by February 11, 1993.

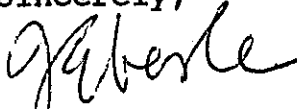
The 5/28/92 "Soil Excavation and Preliminary Groundwater Investigation Workplan" and the 7/17/92 "Site Investigation and Remediation" workplan, both prepared by IC, may be implemented when the management proposal is accepted by this Division. These workplans involve the excavation of hydrocarbon impacted soil and the installation of monitoring wells.

These workplans were conditionally approved by letter from this office dated 10/29/92. You responded to the four conditions by letter dated 11/30/92. The first condition regarding the disposal of purge water at Southern Pacific's wastewater treatment facility located at 515 Bay St. in Oakland, was discussed during a telephone conversation between myself and Walter Floyd of IC on 12/16/92. I suggested the need for EBMUD approval of the change in volume and/or quality of wastewaters to be discharged. This requirement is stipulated both in a 7/31/92 letter from Joseph Damas of the Source Control Division of EBMUD to Steve Strickland of Southern Pacific, and in the Wastewater Discharge Permit (Application) for Southern Pacific, signed by G.F. Bozeman on 5/7/92 (permit number 023-00161).

Greg Shepherd
STID 3681
December 30, 1992
page 2 of 2

If you have any questions, please contact me at 510-271-4530.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Walter Floyd, Industrial Compliance, 9719 Lincoln Village
Drive, Suite 310, Sacramento CA 95827
Rich Hiatt, RWQCB
Joseph Damas, EBMUD Source Control Division, PO Box 24055,
Mail Slot 702, Oakland CA 94623

Ed Howell/File

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



Roll 27

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

October 29, 1992

STID 3681

Southern Pacific Trans. Co.
One Market Plaza, Rm 1007
San Francisco CA 94105
Attn: Greg Shepherd

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: 1912-7th St.
Oakland CA 94607

Dear Mr. Shepherd,

We have received a letter from Industrial Compliance (IC) dated 10/14/92, regarding a proposal for drummed soil disposal. This letter actually refers to the "Oakland and Desert Yards," which apparently includes 721 Cedar St. as well. During a telephone conversation with Walter Floyd of IC today, I accepted this proposal on the condition that drummed drill cuttings from boring BB-2 be included with the soil to be aerated, due to its concentration of benzene (0.48 ppm). The laboratory results for the soil borings were included in the 12/19/91 "Phase II Site Investigation, Oakland and Desert Yards" report by IC.

In the 5/28/92 Soil Excavation and Preliminary Groundwater Investigation Workplan (original workplan) by IC, it was "proposed to excavate impacted soil with a hydrocarbon concentration greater than 100 ppm" (page 4). This soil was to be stockpiled onsite and sampled to evaluate remedial options. As per the 7/17/92 Site Investigation and Remediation workplan by IC, it was "proposed to bioremediate the impacted soil with the addition of compost" and later "to reuse the soil in the construction of an aboveground berm. . ." (page 4 and 5). "Confirmation samples (were to) be collected from the side walls of the excavation . . ." as per the 5/28/92 original workplan by IC.

Since monitoring well BB-1 (aka MW-1) would likely be destroyed during the re-excavation, "a new well (was proposed to) be installed in the original BB-1 location" and "4 additional wells will be installed," as per page 5 of the 7/17/92 Site Investigation and Remediation workplan by IC.

Greg Shepherd
STID 3681
Page 2 of 2
October 29, 1992

These workplans are accepted; we expect them to be implemented within 30 days or by November 29, 1992 on the following conditions:

1. Since you proposed to dispose of purge water at the SPTCo wastewater treatment facility (page 7 of 7/17/92 workplan), please provide us with the address of this facility, and a copy of its treatment/storage/disposal permit.
2. Soil borings for the proposed monitoring wells should be screened using a field instrument. Samples with obvious contamination should be analyzed for TPH-g, TPH-d, and BTEX by a state certified laboratory. (Page 5 of the 7/17/92 workplan states that soil samples will be collected "for lithologic logging purposes only.")
3. It is your responsibility to obtain all necessary permits for the bioremediation of excavated soils. Verification soil sampling should be conducted at the rate of one sample per 20 cubic yards, since you propose to reuse the soil as a land berm.
4. Your proposal to excavate soils impacted with hydrocarbons greater than 100 ppm does not include BTEX concentrations. Our guidelines for benzene call for clean up to nondetectable levels, with a method detection limit of 0.005 ppm.

We will expect a final report on site investigation activities within 6 weeks of groundwater well sampling.

If you have any questions, please contact me at 510-271-4530.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Walter Floyd/Mark Dockum, Industrial Compliance, 9719
Lincoln Village Drive, Ste 310, Sacramento CA 94827
Rich Hiatt, RWQCB
Ed Howell/File

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program

R01127

RAFAT A. SHAHID, Assistant Agency Director

July 20, 1992

STID 3681

Southern Pacific Trans. Co.
One Market Plaza, Rm 1007
San Francisco CA 94105
Attn: Greg Shepherd

RE: 1912 Seventh St.
Oakland CA 94607

Dear Mr. Shepherd,

We have received the revised "Site Investigation and Remediation Workplan," prepared by Industrial Compliance (IC), dated 7/17/92. Jennifer Eberle of our staff telephoned Walter Floyd of IC today to clarify the following points:

1. The overburden (assumed clean) in the vicinity of MW-1 will be excavated, stockpiled, and analyzed at the rate of one sample per 20 cubic yards. This "assumed clean" stockpiled soil will then be used to backfill the excavation pit, providing TPH concentrations are less than 10 ppm.
2. Groundwater generated from well purging/sampling must be analyzed prior to transporting it or disposing it. Analyses must include TPH as gasoline and diesel, and BTEX. If you propose to dispose it at the SPTCo wastewater treatment facility, please provide our office the address of this facility and a copy of its treatment/storage/disposal permit.
3. Soil borings for the proposed monitoring wells should be screened using a field instrument such as the PID. Samples with obvious contamination should be analyzed for TPH-g, TPH-d, and BTEX by a state-certified laboratory.
4. It is your responsibility to obtain all necessary permits for the bioremediation of excavated soils. Verification soil sampling should be conducted at the rate of one sample per 20 cubic yards, since you propose to reuse the soil as a land berm.
5. You propose to excavate soils impacted with a total petroleum hydrocarbon concentration greater than 100 ppm. However, you must also address BTEX concentrations. Our guidelines for benzene call for clean up to nondetectable levels, with a method detection limit of 0.005 ppm.

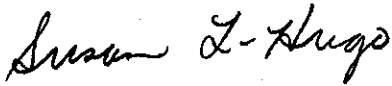
DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

Greg Shepherd
STID 3681
Page 2 of 2
July 20, 1992

Thank you for Figure 2, which is the most comprehensive map to date of the SPTCo sites. Please provide us with a map of the **entire** 1912-7th St. site, including both buildings shown on Figure 2, in relation to the monitoring wells, in the next report. Please specify the name and address of each building. A map showing **all SPTCo sites** would also be most helpful.

If you have any questions, please contact Jennifer Eberle at 510-271-4320.

Sincerely,



Susan Hugo
Senior Hazardous Materials Specialist

cc: Walter Floyd, Industrial Compliance, 9719 Lincoln Village Dr.,
Ste 310, Sacramento CA 95827
Rich Hiett, RWQCB
File

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO1127

RAFAT A. SHAHID, Assistant Agency Director

June 3, 1992

STID 3681

Southern Pacific Trans. Co.
One Market Plaza, Rm 1007
San Francisco CA 94105
Attn: Greg Shepherd

RE: 1912 Seventh St.
Oakland CA 94607

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

Dear Mr. Shepherd,

We are in receipt of your "Soil Excavation and Preliminary Groundwater Investigation Workplan" for the above referenced site, prepared by Industrial Compliance (IC), dated 5/28/92, under cover letter from IC dated 5/28/92. There are a few comments I would like to make:

1) Page 3 of the report states that the lateral extent of hydrocarbon-affected (TPH-g) soils in excess of 100 ppm is estimated to be 20 X 18 X 2 feet. Please provide isoconcentration maps of all contaminants found at the site **within 45 days** from the date of this letter, or **by July 18, 1992**. Page 11 of the "Phase II Investigation" prepared by IC, dated 12/19/91 states that "it is estimated that an area 15 X 15 feet is affected with hydrocarbons concentrations greater than 1,000 ppm." Please clarify the discrepancy between the 100 and 1,000 ppm concentrations.

Therefore, you are requested to proceed with the excavation of hydrocarbon-affected soil as per the "Phase II Investigation" OR provide another remedial option **within 45 days** from the date of this letter, or **by July 18, 1992**. Verification samples must be collected and analyzed by a state-certified laboratory for TPH-g and BTEX. This office must be notified 3 days in advance of this sampling in order for a representative to be onsite.

The lateral and vertical extent of groundwater contamination has not yet been addressed, as requested by letter dated 4/7/92. You are therefore requested to submit a proposal for additional monitoring well(s) in the **verified** downgradient direction in order to define the groundwater plume. We will expect this proposal **within 45 days** from the date of this letter, or **by July 18, 1992**.

2) Page 3 of the Workplan states that "the groundwater gradient has been assessed approximately 1400 feet west of the site, at the SPTCo wastewater impoundments, as being approximately north 20 degrees west." This infers that the groundwater gradient at 1912-7th St. is also northwest. In order to verify the groundwater gradient, you must provide documentation for at least the past year

Greg Shepherd
STID 3681
Page 2 of 2
June 3, 1992

of the groundwater gradient at the SP wastewater impoundments referred to on page 3 of the Workplan. Please include a map of the wastewater impoundments with monitoring well locations. We will expect this information within 45 days from the date of this letter, or by July 18, 1992.

3) Pages 1 and 2 of the cover letter state that "pumping and treating groundwater does not appear warranted for this site since a) the groundwater is not considered for potential use, and b) groundwater remediation has not been required at other sites occurring within the vicinity with confirmed impact."

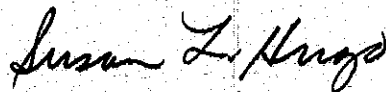
As regards a), reference is made to a concentration of > 5,000 ppm TDS in the aquifer of concern. Where was this sample taken? Where is the laboratory data? Where is the well screened from which the sample was taken? How are you defining the aquifer, i.e. in terms of depth? If this sample was taken from the upper aquifer, how will the existing contamination effect the lower aquifer, the Bay, and the wildlife? Even if the concentration of TDS is too high to consider the aquifer a potential potable water source, the aquifer may be a potential industrial or agricultural water source.

As regards b), reference is made to RWQCB consideration of impacted groundwater at the SPTCo wastewater impoundments and at the SPTCo tar pits as not posing a serious threat to the public or the environment. Can you produce documentation to this effect? As per telephone conversation on 6/3/92 between Jennifer Eberle of this office and Rich Hiatt of the RWQCB, he was not aware of any such consideration.

Please respond to these issues within 45 days from the date of this letter, or by July 18, 1992.

If you have any questions, please contact Jennifer Eberle at 510-271-4320.

Sincerely,



Susan Hugo
Senior Hazardous Materials Specialist

cc: Walter Floyd, Industrial Compliance, 9719 Lincoln Village Dr.,
Ste 310, Sacramento CA 95827
Rich Hiatt, RWQCB
File

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R01127

RAFAT A. SHAHID, Assistant Agency Director

April 7, 1992

STID #3681

Southern Pacific
Transportation Company
One Market Plaza, Rm 1007
San Francisco CA 94105
Attn: Greg Shepherd

RE: 1912-7th St.
Oakland CA 94607

Dear Mr. Shepherd,

This office has received and reviewed the Phase II Investigation report for the above referenced site dated December 19, 1991 by Industrial Compliance Inc. The case has been reassigned to Jennifer Eberle, Hazardous Materials Specialist. Please mail future correspondence to her attention.

Soil and groundwater was sampled on December 12, 1991. Significant concentrations of hydrocarbons were detected both in soil and groundwater. For example, groundwater sample BB-1 exhibited 12,000 ppb TPH-g, 52 ppb benzene, 89 ppb toluene, 220 ppb ethylbenzene, and 1,500 ppb xylenes. Soil sampling revealed up to 2,400 ppm TPH-g, 4.2 ppm TPH-d, 0.48 ppm benzene, 0.3 ppm ethylbenzene, and 6 ppm xylenes.

At this time you are directed to perform the following tasks:

- 1) Determine the groundwater gradient beneath the site.
- 2) Determine the lateral and vertical extent of groundwater and soil contamination.
- 3) Submit a proposal which assesses the feasibility of pumping and treating contaminated groundwater.
- 4) Submit a proposal for treating and/or disposing the contaminated soil as found from the soil borings.
- 5) Communicate in writing as to the disposal of the stockpiled soil from the excavation of the three tanks. Was this soil sampled? Where are the analytical results? Show the location of the stockpile on a map relative to the site location (use Figure 4).
- 6) Continue to submit quarterly sampling results to this office.

Greg Shepherd
April 7, 1992
Page 2 of 2

RE: 1912-7th St.
Oakland CA 94607

- 7) Identify your sites by street address. Specifically, identify the address of "Tank 9 - The Desert Yard Office," "Tank B - A&WE Building and Systems Shop" and "Aboveground Diesel Storage Tank."

The proposals submitted in response to tasks 1, 2, 3, 4, 5, and 6 must adhere to the technical requirements outlined in the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks and the SWRCB LUFT Manual. The proposals are due within 45 days of the date of this letter.

If you have any questions, please phone Jennifer Eberle at 510-271-4320.

Sincerely,

Susan Hugo

Susan Hugo
Senior Hazardous Materials Specialist

cc: Rich Hiatt, RWQCB
Mark Dockum, Industrial Compliance, Inc.
File

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R01127

RAFAT A. SHAHID, Assistant Agency Director

April 7, 1992

STID #3681

Southern Pacific
Transportation Company
One Market Plaza, Rm 1007
San Francisco CA 94105
Attn: Greg Shepherd

RE: 1912-7th St.
Oakland CA 94607

Dear Mr. Shepherd,

This office has received and reviewed the Phase II Investigation report for the above referenced site dated December 19, 1991 by Industrial Compliance Inc. The case has been reassigned to Jennifer Eberle, Hazardous Materials Specialist. Please mail future correspondence to her attention.

Soil and groundwater was sampled on December 12, 1991. Significant concentrations of hydrocarbons were detected both in soil and groundwater. For example, groundwater sample BB-1 exhibited 12,000 ppb TPH-g, 52 ppb benzene, 89 ppb toluene, 220 ppb ethylbenzene, and 1,500 ppb xylenes. Soil sampling revealed up to 2,400 ppm TPH-g, 4.2 ppm TPH-d, 0.48 ppm benzene, 0.3 ppm ethylbenzene, and 6 ppm xylenes.

At this time you are directed to perform the following tasks:

- 1) Determine the groundwater gradient beneath the site.
- 2) Determine the lateral and vertical extent of groundwater and soil contamination.
- 3) Submit a proposal which assesses the feasibility of pumping and treating contaminated groundwater.
- 4) Submit a proposal for treating and/or disposing the contaminated soil as found from the soil borings.
- 5) Communicate in writing as to the disposal of the stockpiled soil from the excavation of the three tanks. Was this soil sampled? Where are the analytical results? Show the location of the stockpile on a map relative to the site location (use Figure 4).
- 6) Continue to submit quarterly sampling results to this office.

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Oakland CA 94607

- 7) Identify your sites by street address. Specifically, identify the address of "Tank 9 - The Desert Yard Office," "Tank B - A&WE Building and Systems Shop" and "Aboveground Diesel Storage Tank."

The proposals submitted in response to tasks 1, 2, 3, 4, 5, and 6 must adhere to the technical requirements outlined in the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks and the SWRCB LUFT Manual. The proposals are due within 45 days of the date of this letter.

If you have any questions, please phone Jennifer Eberle at 510-271-4320.

Sincerely,

Susan Hugo

Susan Hugo
Senior Hazardous Materials Specialist

cc: Rich Hiett, RWQCB
Mark Dockum, Industrial Compliance, Inc.
File

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01127

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

January 11, 1992

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

STID 3681

Southern Pacific Trans. Co.
One Market Plaza, Rm 1007
San Francisco CA 94105
Attn: Greg Shepherd

RE: 1912-7th St.
Oakland CA 94607

Dear Mr. Shepherd,

We have received a letter from Industrial Compliance (IC) dated 11/30/92 and the "Risk Assessment for Benzene-Containing Soil," prepared by IC, dated November 1992. The Risk Assessment was reviewed by Dr. Ravi Arulanantham of our Division. We concur with the report that there is no health threat to construction workers at this site. However, the residual soil and groundwater contamination must be properly managed. Management options should consider containment, deed restriction/notice, and long term monitoring. Therefore, we request that you submit a management proposal within 40 days or by February 21, 1993.

The 5/28/92 "Soil Excavation and Preliminary Groundwater Investigation Workplan" and the 7/17/92 "Site Investigation and Remediation" workplan, both prepared by IC, may be implemented when the management proposal is accepted by this Division. These workplans involve the excavation of hydrocarbon impacted soil and the installation of monitoring wells.

These workplans were conditionally approved by letter from this office dated 10/29/92. You responded to the four conditions by letter dated 11/30/92. The first condition regarding the disposal of purge water at Southern Pacific Transportation Company's (SPTCo) wastewater treatment facility located at 515 Bay St. in Oakland, was discussed during a telephone conversation between myself and Walter Floyd of IC on 12/16/92. I suggested the need for EBMUD approval of the change in volume and/or quality of wastewaters to be discharged. This requirement is stipulated both in a 7/31/92 letter from Joseph Damas of the Source Control Division of EBMUD to Steve Strickland of Southern Pacific, and in the Wastewater Discharge Permit (Application) for Southern Pacific, signed by G.F. Bozeman on 5/7/92 (permit number 023-00161).

IC's letter to EBMUD, dated 1/8/93, serves to notify EBMUD of the discharge of containerized (purged) groundwater into the operating SPTCo water pretreatment facility previously mentioned. This purge water includes groundwater from the SPTCo facility at 721 Cedar St. in Oakland as well.

Greg Shepherd
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January 11, 1992
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If you have any questions, please contact me at 510-271-4530.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Walter Floyd, Industrial Compliance, 9719 Lincoln Village
Drive, Suite 310, Sacramento CA 95827
Rich Hiett, RWQCB
Joseph Damas, EBMUD Source Control Division, PO Box 24055,
Mail Slot 702, Oakland CA 94623

Ed Howell/File

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