

LOP - RECORD CHANGE REQUEST FORM

printed:
06/24/99

Mark Out What Needs Changing and Hand to LOP Data Entry
(Name/Address changes go to Annual Programs Data Entry)

Insp: CL

AGENCY # : 10000 SOURCE OF FUNDS: F SUBSTANCE: 12035
 StID : 1325 LOC: -0-
 SITE NAME: Clement Avenue Property DATE REPORTED : 05/11/89
 ADDRESS : 2241 -0 Clement Ave DATE CONFIRMED: 05/29/89
 CITY/ZIP : Alameda 94501 MULTIPLE RPs : N

SITE STATUS

 CASE TYPE: U CONTRACT STATUS: 9 PRIOR CODE:2 EMERGENCY RESP: -0-
 RP SEARCH: S DATE COMPLETED: 08/28/94
 PRELIMINARY ASMNT: c DATE UNDERWAY: 12/12/91 DATE COMPLETED: 12/31/91
 REM INVESTIGATION: - DATE UNDERWAY: -0- DATE COMPLETED: -0-
 REMEDIAL ACTION: - DATE UNDERWAY: -0- DATE COMPLETED: -0-
 POST REMED ACT MON:c DATE UNDERWAY: 09/27/94 DATE COMPLETED: 10/18/95

ENFORCEMENT ACTION TYPE: 1 DATE ENFORCEMENT ACTION TAKEN: 08/31/94
 LUFT FIELD MANUAL CONSID: 3-
 CASE CLOSED: Y DATE CASE CLOSED: 03/16/96
 DATE EXCAVATION STARTED : 05/11/89 REMEDIAL ACTIONS TAKEN: 05/11/89

RESPONSIBLE PARTY INFORMATION

 RP#1-CONTACT NAME: Francis Collins
 COMPANY NAME: -0-
 ADDRESS: 6050 Hollis Street
 CITY/STATE: Emeryville, CA 94608

INSPECTOR VERIFICATION:

NAME _____ SIGNATURE _____ DATE _____

DATA ENTRY INPUT:

Name/Address Changes Only Case Progress Changes

ANNPGMS _____ LOP _____ DATE _____ || LOP _____ DATE _____

5. Develop a site-specific remediation plan. This plan shall include an evaluation of cleanup alternatives, a proposal for soil cleanup, a proposal for clean up of any groundwater contamination and free product, an appropriate sampling plan to determine the effectiveness of the cleanup program, and a time table for remediation plan implementation.

After the remediation program is completed and the final report is submitted, this office will review the case. If appropriate, this office will submit the case to the San Francisco Bay Regional Water Quality Control Board for final site mitigation approval and case closure. Failure to provide proper documentation of all site cleanup work could result in the requirement to conduct properly documented additional work.

If you have any questions or require further clarification regarding the underground storage closure process within Alameda County, please contact this office at 510-567-6700.

Sincerely,



Gordon Coleman, Acting Chief
Environmental Protection Division

KC



SEQUOIA ENVIRONMENTAL

Consulting Services

6400 Christie Avenue, Suite 3402
Emeryville, CA 94608-1037
(510) 654-1600
(510) 654-1611 FAX

935-110-1111

February 18, 1993

Mr. Kevin Tinsley
Hazardous Materials Specialist
Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

RE: Pilot Bioremediation Project
2235 Clement Avenue, Alameda, California

Dear Mr. Tinsley:

This letter is to confirm our understanding of the discussion held at your office on February 17, 1993, with respect to the pilot bioremediation project at 2235 Clement Avenue in Alameda, California. In attendance at the meeting were:

Alameda County Health Care Services

Mr. Ariu Levi, Supervising Hazardous Materials Specialist
Ms. Pam Evans, Senior Hazardous Materials Specialist
Mr. Kevin Tinsley, Hazardous Materials Specialist

Sequoia Environmental Consulting Services

Mr. Marvin Castro, Project Manager
Mr. Chris Nwabuzoh, Project Geologist

It is our understanding that work on the pilot bioremediation project may begin immediately without further notice from Alameda County Health Care Services (ACHCS). The pilot project is scheduled to begin at the end of February 1993, and anticipated to continue for approximately 90 days. The duration of the pilot project may vary. Our goal is to reduce the level of creosote contamination in the soil. ACHCS will be informed of our progress throughout the project. If the pilot project proves successful, we will request permits from ACHCS and all other appropriate agencies prior to full-scale application of bioremediation.

If you have any questions or comments regarding this letter, please contact me at (510) 654-1600

Sincerely,
Sequoia Environmental Consulting Services

Chris Nwabuzoh
Principal
REA #02842

cc: Mr. Francis Collins, Owner
Mr. Richard Hiatt, SFBRWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

January 23, 1993

Site #441

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

Mr. Francis Collins
Clement Avenue Project
6050 Hollis Street
Emeryville, CA 94608

RE: Work Plan for Pilot Bioremediation Project, located
at, 2235 Clement Avenue, Alameda, CA

Dear Mr. Collins:

The case files for the above site, have been transferred to another Hazardous Materials Specialist, Kevin Tinsley. Our office is in receipt of the following reports and submittals, regarding your property:

- 1) Underground Tank Removal report, August 1989, Rec'd 9/90'
- 2) Subsurface Investigation report, January 1991, Rec'd 2/91'
- 3) Subsurface Investigation report, April 1991, Rec'd 8/91'
- 4) Subsurface Investigation report, June 1991, Rec'd 8/91'
- 5) Underground Tank Closure report, December 1991, Rec'd 2/92'
- 6) Bioremediation Pilot Project Workplan, November 1992,
Rec'd 11/92'

On April 15, 1991 this office sent you a letter requesting a work plan to assess the 6000 ppm petroleum hydrocarbon, 87 ppm benzene, 77 ppm toluene and 48 ppm ethylbenzene contamination documented during the tank removal, May 10, 1989. Additionally, a second correspondence was sent from this office September 24, 1991, requesting the same work plan. A report which defines the vertical and lateral extent of soil and groundwater petroleum contamination was not received. Subsequently, this office received the Underground Tank Closure report, regarding the soil sampling and monitoring well installation work performed in December 1991.

Mr. Collins
January 23, 1993
Page 2 of 5

However, the information requested in the September 24, 1992 correspondence, was not submitted in the closure report either. Therefore, in order to complete the Closure Report, you must provide the following information:

* 1) Submit a copy of the TSDF to generator page of the correct manifest for this tank. The one included in the Closure report submitted, is for a tank removed from Cypress Avenue in Oakland.

* 2) Documentation of the disposal of stockpiled soil generated during the tank removal. Or addendum to the report, stating the whereabouts of this soil or when it was back-filled with copies of receipts for fill material added to the backfill.

3) Soil analysis for the boring samples taken at the 5 foot interval for monitoring well 1, boring 2 and boring 3 (ie TPH gasoline and BTEX).

4) Determine the status of soil at the location where contamination of up to 6,000 ppm total petroleum hydrocarbon (TPH) as gasoline was documented. Assess the lateral and vertical extent of soil contamination if detected.

5) Provide information to confirm the placement of the monitoring well is in a **verified down gradient** position.

Following installation of the monitoring well, it must be surveyed to an established benchmark, with an accuracy of 0.01 foot. Groundwater samples are to be collected quarterly and analyzed along with water level measurements. If the initial quarterly reports indicates that groundwater flow directions vary greatly then you will be required to begin monthly water level measurements until the groundwater gradient behavior is known. Both soil and groundwater samples must be analyzed for the appropriate fuel contaminants.

6) Submit copies of a minimum of four consecutive quarterly reports for the period following installation of the monitoring

(note: * identifies a repeated request)

Mr. Collins
January 23, 1993
Page 3 of 5

well or begin to submit quarterly reports of the water analysis data. **Quarterly Reports** must be submitted until the site is recommended for RWQCB "**closure**". Work plans and reports must be signed by a California registered geologist, civil engineer, or engineering geologist.

Separate from the underground tank removal reports, this office received several subsurface investigation reports. It appears these reports are investigating soil contamination from past industrial activities in the area. A review of the information provided, indicates elevated levels of priority pollutants and metals may be present in soil and groundwater throughout the property, (for a listing of contaminants, refer to the correspondence dated September 24, 1991, from this office).

With the exception of soil borings B4-5 and B5-5, taken at the five foot depth interval, all other soil analysis were taken below the groundwater level. Sample analysis from monitoring well 19 and soil borings taken at depths of ten feet or greater shows contamination has impacted the groundwater. Information on the amount of contamination in shallow soil was not in the reports. At this time you are required to determine the extent and magnitude of contamination in the soil from grade to a five feet depth. A work plan with a timetable for completing this work must be developed in accordance with the "Tri-Regional Board Staff Recommendations, **Attachment A**, which includes but is not limited to the following:

1. Map the locations of hazardous material use and storage, subsurface conduits, onsite wells, utilities, buildings and past or present tank locations.

2. Describe the type of business on site, associated activities, and type of hazardous materials used on site, past and present.

3. Describe any hazardous materials spills, leaks and accidents at the site - including any related to existing and previously removed tanks

4. Summarize known soil contamination and any remedial work

done on site or adjacent properties.

Mr. Collins
January 23, 1993
Page 4 of 5

5. Describe the method for determining the extent of soil contamination, method use to determine the number and location of samples taken. Describe method used to determine past sampling locations and depths.

The need for further investigative work, risk assessment or remedial action will be based upon more definitive soil and groundwater investigations. Your work plan regarding the additional information or further site assessment needed must be submitted within 30 days of the date of this letter or by March 30, 1993.

If a remediation plan is developed, its overall effectiveness must be verified by an appropriate monitoring program with specific information on the system. The design and application of the remedial treatment system must be based on appropriate review of hydro-geologic and water quality data. Aquifer test must be used if needed. Finally, the remediation process must restore contaminated groundwater and soil to beneficial uses within an acceptable time frame.

The proposed pilot Bioremediation work plan dated November 4, 1992 may be used to affirm treatability of the site. You are hereby informed this small scale and unconfirmed feasibility study is not a remediation plan which complies with requests from this office for further assessment and clean-up of the contamination. After it is established the program is capable of remediating the identified contamination. A complete report of the methods, procedures and results must be attached to the workplan submitted. You should be aware the San Francisco Bay Region-Water Quality Control Board must approve in writing the injection of biological material or chemicals into soil which may effect groundwater. If you wish to obtain additional information regarding technology or documentation of the study, feel free to contact Bruce LaBelle Ph.D at (916) 324-2958 in the office of Pollution Prevention and Technology Development. A copy of all correspondence and reports regarding this site should be sent to this office and to:

San Francisco Bay Region-Water Quality Control Board
Attn. Richard Hiatt
2101 Webster Street, Fifth Floor
Oakland, California 94612
(510) 283-1255

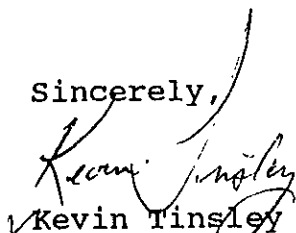
Mr. Collins
January 23, 1993
Page 5 of 5

Please be advised that this is a formal request for technical reports pursuant to the California Water Code, Section 13267 (b). Failure to respond may lead to further legal action resulting in civil penalties, a maximum of \$1000.00/ per day. Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency or the SFBRWQCB.

You will need to submit a deposit of \$750.00 payable to the County of Alameda to cover costs that the Division of Hazardous Materials incurs in overseeing and reviewing reports and proposals. Funds previously deposited to your account have been expended (current rate is \$75.00/ per hour). This deposit is authorized by county ordinance, code section 3-141.6. Upon completion of the project the balance will be refunded to you.

Should you have any questions concerning this letter, please contact me at (510) 271-4320.

Sincerely,



Kevin Tinsley
Hazardous Materials Specialist

c, Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Richard Hiett, San Francisco Bay-RWQCB
Bruce LaBelle Ph.D, DTSC, PPTD
Chris Nwabuzoh, Sequoia Environmental

RGA Environmental, Inc.

Environmental Consultants

* Date: 27 Feb 92

* To: Susan Huezo

* Re: Faxed report

* From: Robert Gils

Including this page, 3 pages are being transmitted.

If you have any questions, please call the above named person at (510) 547-7771.

Notes:

FA FedEx'd report to Charles Fox

and Richard Wright.

Original to follow by: U.S. Mail Federal Express Courier No Hard Copy to Follow

RGA Inc., 1260 45th St., Emeryville, CA. 94608

Fax (510) 547-1983

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FEDERAL EXPRESS AIRBILL TRACKING NUMBER 1315348871

1250R 1315348871

SENDER'S FEDERAL EXPRESS ACCOUNT NUMBER 1150-4007-3

From (Your Name) Please Print **Robert Gils** To (Recipient's Name) Please Print **Charles Fox**

Company **ROBERT GILS ASSOCIATES INC** Department/Floor No.

Street Address **1260 45TH ST** Exact Street Address (No Corner Delivery, P.O. Box or P.O. Zip Code)

City **EMERYVILLE** State **CA** ZIP Required **94608** City **Berkeley, CA** ZIP Required **94710**

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12 <input type="checkbox"/> FEDEX LETTER	52 <input type="checkbox"/> FEDEX LETTER*
13 <input type="checkbox"/> FEDEX BOX	53 <input type="checkbox"/> FEDEX BOX*
14 <input type="checkbox"/> FEDEX TUBE	54 <input type="checkbox"/> FEDEX TUBE*
30 <input type="checkbox"/> ECONOMY TWO-DAY	40 <input type="checkbox"/> NOV LETTER
	41 <input type="checkbox"/> NOV TUBE
42 <input type="checkbox"/> FEDEX FIRST	60 <input type="checkbox"/> TWO-DAY REGULAR**

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1 <input type="checkbox"/> HOLD FOR PICK-UP (No address)	2 <input type="checkbox"/> DELIVER SAFELY (No address)
3 <input type="checkbox"/> DANGEROUS GOODS (See section)	4 <input type="checkbox"/> FRAGILE
5 <input type="checkbox"/> PERISHABLE	6 <input type="checkbox"/> ODOR
7 <input type="checkbox"/> OTHER SPECIAL SERVICE	8 <input type="checkbox"/> SECURITY PICK-UP (See charge)
9 <input type="checkbox"/> NO DELIVERY (See charge)	10 <input type="checkbox"/> NO DELIVERY (See charge)
11 <input type="checkbox"/> HOLIDAY DELIVERY (See charge)	12 <input type="checkbox"/> HOLIDAY DELIVERY (See charge)

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1250M 1315348823				527 8942	
REMITTANT FEDERAL EXPRESS ACCOUNT NUMBER 1150-4007-3 Date 2/27/92					
From (Company Name, Please Print) Robert Gils		Your Phone Number (Very Important) 415-547-7771		To (Recipient's Name) Please Print Richard Wright	
Company ROBERT GILS ASSOCIATES INC		Department/Floor No. 		Company 	
Street Address 1260 45TH ST		Exact Street Address (No Street or P.O. Box or R.F. or Delta) 1001 Bridgeway		State CA	
City EMERYVILLE		State CA		ZIP Required 94965	
YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 20 characters will appear on invoice)					
PAYMENT 1 <input checked="" type="checkbox"/> By Remitter 2 <input type="checkbox"/> By Recipient 3 <input type="checkbox"/> By 3rd Party 4 <input type="checkbox"/> By Other		City 		State 	
5 <input type="checkbox"/> Cash 6 <input type="checkbox"/> Check 7 <input type="checkbox"/> A/C Debit Card		ZIP Required		ZIP Required	
SERVICES (Check only one box)		DELIVERY AND SPECIAL HANDLING (Check services required)		SERVICE CONDITIONS, DECLARED VALUE AND LIMIT OF LIABILITY	
11 <input type="checkbox"/> OVERNIGHT 12 <input type="checkbox"/> FEDEX NEXT BUSINESS DAY 13 <input type="checkbox"/> FEDEX 2ND DAY 14 <input type="checkbox"/> FEDEX FIRST CLASS 15 <input type="checkbox"/> REGULAR		1 <input type="checkbox"/> NO BOX FOR RETURN 2 <input type="checkbox"/> DELIVER WITHIN 10 MINUTES 3 <input type="checkbox"/> DELIVER TO FRONT DOOR 4 <input type="checkbox"/> DELIVER TO BUSINESS 5 <input type="checkbox"/> DELIVER TO HOME 6 <input type="checkbox"/> DELIVER TO PO BOX 7 <input type="checkbox"/> DELIVER TO BUSINESS 8 <input type="checkbox"/> DELIVER TO HOME 9 <input type="checkbox"/> DELIVER TO BUSINESS 10 <input type="checkbox"/> DELIVER TO HOME 11 <input type="checkbox"/> DELIVER TO BUSINESS 12 <input type="checkbox"/> DELIVER TO HOME		Limit of liability for loss or damage to contents of package is \$100 per package unless otherwise indicated on invoice. For higher limits, please contact your local office. We will not be responsible for any loss or damage to contents of package if the package is not properly packed, sealed and labeled. We will not be responsible for any loss or damage to contents of package if the package is not properly packed, sealed and labeled. We will not be responsible for any loss or damage to contents of package if the package is not properly packed, sealed and labeled.	
16 <input type="checkbox"/> INSURANCE 17 <input type="checkbox"/> INSURANCE 18 <input type="checkbox"/> INSURANCE 19 <input type="checkbox"/> INSURANCE 20 <input type="checkbox"/> INSURANCE		13 <input type="checkbox"/> DELIVER TO BUSINESS 14 <input type="checkbox"/> DELIVER TO HOME 15 <input type="checkbox"/> DELIVER TO BUSINESS 16 <input type="checkbox"/> DELIVER TO HOME 17 <input type="checkbox"/> DELIVER TO BUSINESS 18 <input type="checkbox"/> DELIVER TO HOME 19 <input type="checkbox"/> DELIVER TO BUSINESS 20 <input type="checkbox"/> DELIVER TO HOME		Federal Express Use Base Charge Declared Value Charge Other 1 Other 2 Total Charges SEASON DATES FROM 5:00 TO 5:00 099 © 1991 FE EX PRINTED IN U.S.A.	

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RGA Environmental, Inc.

Environmental Consultants

* Date: December 4, 1991

* To: SUSAN HUGO

* Re: 2235 CLEMENT AVENUE

* From: CHRIS MUMBAUZH

Including this page, 2 pages are being transmitted.

If you have any questions, please call the above named person at (415) 547-7771.

Notes:

Original to follow by: U.S. Mail Federal Express Courier No Hard Copy to Follow

RGA Inc., 1260 45th St., Emeryville, CA. 94608

Fax (415) 547-1983

10.24.91

TO: Susan Hugo - County of Maricopa Health Dept.

Fr: Lauren Meyer 653-6871
Clement Ave. Project

Please find enclosed check for \$670 - #511
\$300 - for outstanding balance and
370 - for deposit on additional work.

Also, this is the address we have for
the attorney for Charles Fox, 2229 Clement
Ave. Property.

Richard S. Wright
Attorney at Law
1001 Bridgeway
Sausalito, California 94965

I suggest you correspond with him using
registered mail to assure receipt.

Please call if you have any questions.

Sincerely,

Lauren Meyer
for Francis Collins
2235 Clement Ave.

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

September 24, 1991

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

Mr. Francis D. Collins
Clement Avenue Associates
P.O. Box 8685
Emeryville, CA 94662-0685

**RE: Subsurface Investigations - 2235 Clement Avenue and
2229 Clement Avenue, Alameda 94501**

Dear Mr. Collins:

We have reviewed the Subsurface Investigation and Addendum Subsurface Investigation reports submitted by Robert Gils Associates, Inc. for the property located at 2235 Clement Avenue in Alameda. We have also received and reviewed the Subsurface Investigation report for the Fox property located at 2229 Clement Avenue. Based on this review, the following areas of concern to this department must be addressed for each site :

2235 Clement Avenue, Alameda-formerly occupied by Reliance Steel

*Elevated levels of priority pollutants were detected in soil and groundwater samples -

2,4-Dimethylphenol	0.17 ppm (soil)	780 ppb (water)
2-Methylnaphthalene	10.0 ppm (soil)	150 ppb (water)
2-Methylphenol(o-Cresol)		240 ppb (water)
4-Methylphenol(p-Cresol)		150 ppb (water)
Acenaphthene	8.8 ppm (soil)	60 ppb (water)
Anthracene	4.0 ppm (soil)	
Benzo(a)anthracene	1.3 ppm (soil)	
Benzo(a)pyrene	0.6 ppm (soil)	
Benzo(b)fluoranthene	1.5 ppm (soil)	
Chrysene	1.9 ppm (soil)	
Dibenzofuran	5.9 ppm (soil)	
Flouranthene	6.3 ppm (soil)	
Fluorene	6.5 ppm (soil)	2 ppb (water)
Naphthalene	34.0 ppm (soil)	1500 ppb (water)
Phenanthrene	14.0 ppm (soil)	5 ppb (water)
Pyrene	4.9 ppm (soil)	
Bis(2-chloroethyl)ether		14 ppb (water)
3-Methylphenol (semi-quantified result)		700 ppb (water)
Butyl Cellosolve (semi-quantified result)		500 ppb (water)
Phenol - C8 H10 O (semi-quantified result)		500 ppb (water)
Phenol - C9 H12 O (semi-quantified result)		300 ppb (water)

Some of these compounds are known to the state of California to cause cancer. Arsenic (3.1 ppm), barium (97 ppm), chromium (60ppm), nickel (48ppm), vanadium (53ppm) lead (7ppm), zinc (47ppm) were detected above background levels. The source of these pollutants must be investigated.

TTLc
barium 10,000
Arsenic 500
Nickel 2,000
Vanadium 2,400
Lead 1000
Chromium 2,500
Zinc 5,000

Mr. Francis D. Collins
September 24, 1991
Page 2 of 4

- * A 550 gallon leaded gasoline tank was removed from this property on May 10, 1989. Soil contamination of up to 6,000 ppm total petroleum hydrocarbon (TPH) as gasoline was detected. Previous correspondence from this office (dated April 15, 1991) required that a work plan be developed in accordance with Attachment A and submitted to this office within 45 days of the date of the April 15, 1991 letter and should also include a timetable for the completion of the workplan elements. This office has not received this work plan. However, a subsurface investigation report was submitted showing elevated levels of priority pollutants and metals above background levels. You are required to submit a work plan developed in accordance with Attachment A which must address the contamination from the underground storage tank and the pollutants detected during the subsurface investigation. The work plan must be submitted within 30 days of the date of this letter or by **October 24, 1991**.
- * A copy of the TSDF to generator copy of the correct manifest for the tank must be submitted. The one that was included in the Baseline Environmental Consulting's report was for a tank removed from Cypress Avenue in Oakland.
- * Documentation of the disposal of stockpiled soil generated during the tank removal must be submitted.
- * A remediation plan must be developed. The overall effectiveness of the remediation plan system should be verified by an appropriate monitoring program. The plan is to include a time schedule for plan implementation and at a minimum address the following items:
 - 1) Expedient removal of all free product by an appropriate remediation system. Specific information on the system must be submitted. Actual amount of free product must be monitored and tabulated.
 - 2) Remediation of dissolved constituents and contaminated soil. Contaminated ground water must be remediated such that beneficial uses of the ground and surface water are restored and/or protected as required by RWQCB's "Policy with Respect to Maintaining High Quality of Water's in California".
 - 3) Design of remedial treatment system. Remedial treatment systems must be designed base on appropriate review of hydro-geologic and water quality data. Aquifer test data (pump and/or slug testing) must be used to determine aquifer characteristics and the capture zone of the extraction system.

2229 Clement Avenue, Alameda - Fox Property

* Elevated levels of priority pollutants were detected in the soil samples -

Acenaphthene	20.0	ppm
Anthracene	6.1	ppm
Benzo(a)pyrene	1.5	ppm
Benzo(b) fluoranthene	4.6	ppm
Benzo(k) fluoranthene	4.6	ppm
Chrysene	12.0	ppm
Dibenzofuran	14.0	ppm
Fluoranthene	28.0	ppm
Fluorene	16.0	ppm
Naphthalene	81.0	ppm
Phenanthrene	52.0	ppm
Pyrene	18.0	ppm
2-methylnaphthalene	18.0	ppm
3,3'- Dichlorobenzidine	0.3	ppm
Benzo(a)anthracene	0.3	ppm
Butylbenzylphthalate	0.3	ppm
Dibenzo(a,h)anthracene	0.7	ppm
Indeno(1,2,3-c,d)pyrene	0.7	ppm

Some of these compounds are known to the state of California to cause cancer. Barium (65 ppm), beryllium (0.4 ppm), cadmium (7.0 ppm), cobalt (9.0 ppm), chromium (57.0 ppm), copper (20.0 ppm), nickel (48.0 ppm), lead (6.0 ppm), vanadium (53.0 ppm), zinc (47.0 ppm), arsenic (3.1 ppm), mercury (0.06ppm) were detected. The source of these pollutants must be investigated.

* The extent and magnitude of soil contamination must be determined. A work plan must be developed in accordance with Attachment A and submitted to this office within 30 days of the date of this letter or by **October 24, 1991**.

Reports documenting implementation of the workplan must contain:

1. Actions that have occurred since the last report.
2. Water levels records.
3. Clear records of field observations
4. Chain of custody forms
5. Laboratory-originated analytical results
6. Water level contour maps
7. Gradient determinations
8. Status of free product remediation
9. Status of soil remediation
10. Status of soil contamination definition
11. Status of dissolved constituents remediation

Mr. Francis D. Collins
September 24, 1991
Page 4 of 4

12. Status of dissolved constituents plume definition
13. Copies of TSDf to Generator manifests for any hazardous wastes hauled off site
14. Soil boring/well logs of existing/new wells/borings, signed by appropriate **registered or certified professional.**

The need for additional investigative or remedial actions at these sites will be based upon the data derived from this investigation. This department will oversee the assessment and remediation. However, RWQCB may choose to take over as lead agency if it is determined that there has been substantial impact to ground water.

A report must be submitted within 30 days after completion of this investigation. Subsequent reports must be submitted **quarterly** until the site can be recommended for RWQCB "**sign off**". All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professional involved with the project. Copies of reports and proposals must also be submitted to:

Eddie So

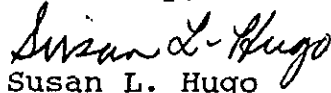
Regional Water Quality Control Board, San Francisco Bay Region
2101 Webster Street, Fourth Floor
Oakland, California 94612

Please be aware that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency or the RWQCB.

You will need to submit an additional deposit of \$670.00 payable to the County of Alameda to cover costs that the Division of Hazardous Materials incurs during remediation oversight.

Should you have any questions about this letter, please contact me at (510) 271-4320.

Sincerely,



Susan L. Hugo
Hazardous Materials Specialist

attachment

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health
Gil Jensen, Alameda County District Attorney's Office
Eddie So, San Francisco Bay RWQCB
Howard Hatayama, Department of Health Services
Chris Nwabuzoh, Robert Gils Associates, Inc.
Richard S. Wright, Fox Property
✓ Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

Certified Mailer #: P 062 128 350

April 15, 1991

Francis D. Collins and Howard N. Goldenberg
Clement Avenue Project
P.O. Box 8685
Emeryville, CA 94662-0685

**Re: Contamination Investigation Requirements for the Underground
Storage Tank Leak at 2235 Clement Avenue, Alameda, 94501**

Dear Mr. Collins and Mr. Goldenberg:

We have reviewed the Report on Underground Tank Removal for 2235 Clement Avenue, Alameda, California dated August 1989 and prepared by Baseline Environmental Consulting. According to this report, a 550 gallon leaded gasoline tank was removed from the above property on May 10, 1989. Soil contamination of up to 6,000 ppm total petroleum hydrocarbons (TPH) gasoline was detected. Based on these findings and to make progress toward case closure, a workplan must be developed in accordance with Attachment A. The workplan must be submitted to our office within 45 days of the date of this letter and must contain a timetable for the completion of the workplan elements.

In addition to the work plan, the following items must be submitted:

- 1) A copy of the TSDF to generator copy of the correct manifest for the tank (the one that was included in Baseline Environmental Consulting's report was for a tank removed from Cypress Avenue, in Oakland);
- 2) Documentation of what was done or will be done with the stockpiled soil. Note: the number of samples collected from the stockpiled soil must be adequate to characterize the soil for the soil handling/disposal method.

Our office will be the lead agency overseeing the investigation and cleanup activities of this site. The San Francisco Bay Regional Water Quality Control Board (SFRWQCB) is currently unable to oversee the large number of underground tank cases within Alameda County and has delegated the handling of this case to our Division. We will be in contact with the SFRWQCB in order to provide you with guidance concerning the SFRWQCB's investigation requirements. However, you must keep the SFRWQCB apprised of all actions taken to characterize and remediate

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Messrs. Collins and Goldenberg
2235 Clement Avenue, Alameda
April 15, 1991

contamination at this site as the Board retains the ultimate responsibility for ensuring protection of waters of the state. **Please be aware that you are responsible for performing diligent actions to protect the waters of the State.**

All proposals, reports and analytical results pertaining to this investigation must be sent to our office and to:

Lester Feldman
Regional Water Quality Control Board, San Francisco Bay Region
2101 Webster Street, Fifth Floor
Oakland, California 94612
(415) 464-1255

You should be aware that this Division is working in conjunction with the SFRWQCB and that this is a request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond may result in referral of this case to the SFRWQCB for enforcement and may subject Clement Avenue Project to civil liabilities imposed by the SFRWQCB to a maximum amount of \$1,000 per day. Any extensions of agreed-upon time deadlines must be confirmed in writing by either this Division or the SFRWQCB.

Should you have any questions concerning this letter, please contact me at (415) 271-4320.

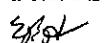
Sincerely,



Katherine A. Chesick,
Senior Hazardous Materials Specialist

attachment

cc: Chris Nwabuzoh, RGA Associates
Steve McKinley, Alameda Fire Department
Lester Feldman, Regional Water Quality Control Board,
San Francisco Bay Region
Howard Hatayama, State Department of Health Services
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Rafat A. Shahid, Director, Alameda County Environmental
Health Department

Files


P 062 128 350 KC

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PS Form 3800, June 1985

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3. Article Addressed to: Francis D. Collins & Howard N. Goldenberg Clement Avenue Project P.O. Box 8685 Emeryville, CA 94662-0685	4. Article Number P 062 128 350
5. Signature - Address X	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature - Agent X	Always obtain signature of addressee or agent and DATE DELIVERED.
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ATTACHMENT A

WORK PLAN REQUIREMENTS FOR AN INITIAL SUBSURFACE INVESTIGATION

This outline should be followed by professional engineering or geologic consultants in preparing site investigation work plans for submittal to the San Francisco Regional Water Quality Control Board (SFRWQCB) and local agencies. Work plans and reports must be signed by a California registered geologist, civil engineer, or engineering geologist.

The proposed work must be planned and performed in accordance with the "Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, 10 August 1990" (hereafter referred to as "10 August 1990 SFRWQCB document"). Copies of this document can be obtained by calling the SFRWQCB data management group at 464-1269. Please note the LUFT manual as a whole has not been adopted by the SFRWQCB.

WORK PLAN FORMAT

I. Introduction

A. Summarize the scope of work.

B. Site Description - provide the following information:

1. A map which shows the site location, nearby streets, nearby streams and nearby water bodies.
2. A map which shows the site buildings; locations of historic and existing underground tanks, piping and islands; locations of hazardous materials storage and use; subsurface conduits and utilities on the site; and on-site and nearby wells.
3. A description of the hydrogeologic setting of the site and surrounding area.

C. Site Use History

- * 1. Describe the type of business, associated activities, and hazardous materials use that currently take place at the site.
- * 2. Describe all previous businesses, associated activities, and hazardous materials use which operated on the site.

3. Provide the following information for each tank that exists or has existed on the site (give the number of each tank type):

- a) tank use and a list of the materials that have been stored in the tank;
- b) tank capacity and construction material;
- c) the date of tank and piping installation and removal; and
- d) the tank and piping condition at the time of removal.

* 4. Describe any hazardous materials spills, leaks and accidents at the site - including any related to existing and previously removed tanks.

* 5. Summarize known soil contamination and any remedial measures already conducted on site.

* 6. Briefly describe contamination problems and remedial work done on adjacent sites.

II. Determination of the vertical and lateral extent of soil contamination - provide the following information:

* A. Describe the method for determining the extent of soil contamination:

1. If a soil gas survey is planned, identify the location of survey points, the sampling depths, the field sampling techniques, and the analytical methods to be used. A quality assurance plan for field analyses must be submitted.
2. If soil borings are to be used for contamination delineation, identify location (mapped) and depth of the proposed borings, boring drilling and soil sampling methods (including decontamination procedures), chain of custody procedures, the boring abandonment method, and the soil analyses which will be done.

Note: Consult the SFRWQCB guidelines and the LUFT manual for soil sampling and boring logging protocols. All borings are to be permitted through Alameda County Flood Control and Water Conservation District, Zone 7. In addition to requirements noted in the 10 August 1990 SFRWQCB and LUFT manuals, borings and wells shall be logged from undisturbed soil samples; logs shall include observed soil odors. Also, soil samples must be analyzed by a California State Certified Laboratory for the

where are background boring data

appropriate constituents (see Attachment 1, Table 2, 10 August 1990 SFRWQCB document).

III. Determination of Ground Water Quality.

Due to the potential that fuel may have already contaminated the ground water, water quality must be characterized. Data from ground water monitoring wells is to be used to evaluate ground water quality. The following must be provided:

A. The number and location of the monitoring wells

Note: If the ground water gradient has been established for the site, then complete gradient data must be submitted and only one monitoring well must be installed; this well must be within 10 feet of the tank in the down-gradient direction. If the gradient has not been established for the site, a minimum of three monitoring wells must be installed to determine the ground water gradient. Attempts should be made to place one of these monitoring wells within 10 feet of the tank in the down-gradient direction. All wells are to be permitted through Alameda County Flood Control and Water Conservation District, Zone 7.

B. Monitoring well construction information (drilling method, decontamination procedures, soil sample collection method, well depth, well diameter, casing type, screen interval and slot size, filter pack, depth and type of seal, development method and criteria for determining adequate development).

Note: Monitoring wells shall be designed and constructed to be consistent with the SFRWQCB guidelines and to permit entrance of any free product into the wells. Filter pack and slot sizes for all wells should be based both on particle analysis and on the types of ground water contaminants present. The well screen must be situated to intercept any free product from both the highest and lowest ground water levels.

C. Plans for disposal of well cuttings and development water.

D. Surveying plans for wells (wells must be surveyed to mean sea level to an established bench mark to 0.01 foot).

E. Monitoring well sampling plans (including water level measurement procedure, well purging procedures and purged water disposal protocol, sample collection and analysis procedures, quality assurance plan, and chain-of-custody procedures).