



**CERTIFIED**

January 4, 1994

ALCO  
HAZMAT  
94 JAN -5 PH 4: 20

Ms. Madhulla Logan, M.S.  
Alameda County Health Agency  
Department of Environmental Health  
80 Swan Way Room 200  
Oakland, CA 94621

Subject: 750 High Street Oakland, California  
(CERTIFIED file reference S30257)

Dear Ms. Logan:

This letter is to amplify soil test data in the Chronology and Documentation 750 High Street, Oakland, California ("Chronology") presented to you and Mr. Richard Hiatt on November 16, 1993. You asked specifically for clarification regarding soil chemistry and Polychlorinated Biphenyls (PCBs).

1. Three areas were targeted for soil excavation on behalf of Southern Pacific Transportation Company on April 30 and May 8, 1990. The three areas were targeted based upon i) pre-excavation soil testing by Ecology & Environment (E & E) prior to the above dates of excavation and ii) visible oil staining. Reports of pre-excavation soil testing by E & E are under separate cover and supplement the "Chronology."

2. The highest PCBs levels were consistently found at the locations having the highest oil levels (see the chart, page 2 herein). PCBs were contained in a oil-based, dielectric fluid. This means that excavation which was targeted to remove oil-stained soil also removed the PCB residue contained therein.

3. The targeted areas of excavation (labelled as A, B, and C by E & E) were all internal to the subject site and appeared separated from other adjacent land uses. These three above areas of excavation were independently verified by CERTIFIED by inspection of the archived Pacific Aerials photograph (No. AV-3845-10-34) dated June 12, 1990. Therefore, it is CERTIFIED's interpretation that historic PCBs did not apparently extend off-site.

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Sample Location	ROUND #1 (PPM)		ROUND #2 (PPM)	
	Petroleum Oil	PCBs	Petroleum Oil	PCBs
C-101	2800	2.5	13	NT
C-103	1700	1.6	<10	NT
C-102	910	1.5	20	NT
C-100	130	0.589	13	NT
C-104	34	<0.022	NT	NT

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NOTES: NT Not tested PPM Parts Per Million  
ROUND #1 after initial excavation  
ROUND #2 after subsequent additional excavation

SOURCE: Ecology & Environment, July 16, 1990

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4. The letter to John Moe of Southern Pacific Transportation Company from Cynthia Chapman of the Alameda County Department of Environmental Health dated August 2, 1991 ("Chronology," Section 4) acknowledged her receipt of the characterization of soil chemistry. Ms. Chapman wrote that the item to address as of August 1991 was one of water quality, not soil quality.

Reports submitted to Alameda County Department of Environmental Health document that the PCB/oil-affected soil was excavated to below 20 ppm oil. The historic PCB content resided in the dielectric oil which was removed by excavation and properly disposed.

5. Ground-water testing in August 1993 confirmed the absence of systematic, detectable PCB residue in ground water ("Chronology," Section 8). Current and previous analytical results of ground-water monitoring are interpreted by CERTIFIED to be consistent with drag-down of surface PCB-affected soil during well installation. All monitoring wells were installed in 1989 before excavation in 1990, as documented in the "Chronology."

#### Status of Ground-Water Closure

Staff of the California RWQCB and Alameda County Health Agency, Department of Environmental Health, accepted CERTIFIED's proposal to resample the six wells and retest all six for PCBs (U.S. EPA Method 608/8080) on one more sampling event. Prior to resampling of the existing wells in August 1993, it was agreed by staff that staff could recommend case closure to their respective agencies if the results were nondetectable for PCBs. Staff considered this proposal in the context of the available information previously submitted to the Alameda County Health Agency and California RWQCB (as summarized in the "Chronology"), and circumstances particular to this site, such as the excavation and disposal of PCB residue, commercial/industrial land use, no use of local ground water for drinking or irrigation, and no undue risk to human health or the environment.

The most recent well monitoring results show no detectable PCB residue in ground water. Historic well monitoring shows no systematic, detectable PCB residue. Therefore, CERTIFIED on behalf of the site owner, Mr. John Bacon, has respectfully requested a letter of concurrence and case closure issued from the office of Mr. Richard Hiatt to close the ground-water issue.

Based upon my telephone communication with Mr. Richard Hiatt on January 4, 1994 CERTIFIED understands that a letter of closure is being drafted for consideration and approval by Mr. Lester Feldman, RWQCB Section Leader, North Bay Toxics. On January 4, 1994 Mr. Hiatt requested soil boring and well construction diagrams. Completion of the draft letter of closure to close the ground-water issue is pending Mr. Hiatt's receipt of these well construction diagrams. I have an appointment to receive the diagrams from Mr. John Moe of Southern Pacific Transportation Company on Wednesday, January 5, 1994.

Status of Soil Closure

Based upon the archival results of soil sampling and testing, CERTIFIED concludes that the available information about known, historic PCB residues in soil on the subject site does not warrant further action or deed encumbrances of any kind. The known, historic PCB residues have been excavated and properly disposed. CERTIFIED and staff of the Alameda County Department of Environmental Health and California Regional Water Quality Control Board (RWQCB) concur that this issue of historic PCB residue in soil should be closed.

CERTIFIED on behalf of the site owner, Mr. John Bacon, respectfully requests a letter of concurrence and case closure issued from your office by January 11, 1994. Please let me know if this request or schedule is not feasible.

Sincerely,



Marc Papineau  
Manager, Physical Sciences Department  
California Registered Environmental Assessor 791

cc. Mr. Richard Hiatt, California RWQCB, San Francisco Bay Region  
Mr. John Bacon, Site Owner

enclosures: none