

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R01135

October 5, 1989

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)Mr. John Moe
Southern Pacific Transportation Company
One Market Plaza
San Francisco, CA 94105

Re: High Street Property, Oakland, CA

Dear Mr. Moe:

As discussed and agreed upon during our meeting on September 14, 1989, I have prepared a list of comments on the conclusions and recommendations given in the Environmental Assessment Report prepared by Ecology and Environmental (E&E) for the above shown property.

Soil contamination appears to be a problem from surface to varying depths. Assessment work by Property Contamination Control (PCC), and E&E found high levels of Lead (E&E4B-538mg/kg & E&E2A-6.7mg/L), Total Oils and Grease (TOG) (PCC4c-5920ppm), Total Petroleum Hydrocarbons (TPH) (E&E7C-1600 ppm), and PCBs (PCC1-260ppm). This collection of waste was found from surface to depths of up to 6.5 feet (E&E8C: Pb-126ppm, TOG-220ppm).

The general recommendation by E&E to excavate and remove oil contaminated soil is acceptable. Excavating contaminated soil, though, cannot be limited to visibly stained soils. Soils contaminated by O&G were discovered to 6.5 feet. The general rule of determining lateral and vertical extent of contamination must be followed. An "action level" for determining the "clean" isopleth must be proposed.

The C designated area merits further discrete sampling for TOG. Composite sampling by E&E found TOG up to 2800 ppm. Though discrete samples were taken from this area (Table 4-4), the samples were not evaluated for TOG.

The presence of lead at levels in excess of state limits remains an open question. Sample C-21A found lead at 1110 mg/Kg, and sample B-2A shows soluble lead concentrations of 6.7 mg/L. According to these results, the property appears to contain lead at levels in excess of the state's TTLC and STLC limits. E&E's contention that these results were caused by laboratory error, or were nonrepresentative of potential impact to ground water may be correct. To possibly accept this conclusion, additional ground water evaluation for lead must be conducted, and background levels for total lead must be established.

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PCB discovery in both subsurface soil and groundwater samples indicates the need for remediation. PCBs were found in the soil by both PCC (sample 1- 260ppm) and E&E (composite sample 7C-16ppm). The state's TTLC limit for PCB's is 50 ppm. E&E's designated Area B-2 and Area C require further evaluation for the lateral and vertical extent of PCB's in excess of the TTLC limit. Soils with PCBs in excess of the TTLC limit must be removed under manifest.

Additional groundwater monitoring wells will be required to evaluate the impact to groundwater by the waste found at the property. As covered by Mr. Kazemi of the SFRWQCB during our meeting, one well (C-2) in the assumed downgradient direction (SE) from the area of heaviest contamination (Area C) is inadequate. Additional well locations must be proposed.

Groundwater sampling is to be conducted quarterly. The samples must be evaluated for priority metals, TPH(g&d), TOG, BTXE, & PCBs. Analysis results must include the test detection limits.

Last, as stated in the meeting, the reports developed by E&E appear to define the areas of concern. What remains to be done is additional evaluation that responds to the earlier discoveries, and then site clean up.

If you have any questions concerning the contents of this letter please contact the undersigned.

Sincerely,



Ariu Levi, Hazardous Materials Specialist
Alameda County Environmental Health

cc: Rafat Shahid, Director of Environmental Health
Hossain Kazemi, SFRWQCB
Bob Enkeboll, E&E
Mr. J. Hollander
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

CARL N. LESTER, Agency Director



Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

R01135 (744 High)

March 2, 1989

AGENCY HEADQUARTERS
XXXXXXXXXXXXXXXXXXXXX
499 Fifth Street
XXXXXXXXXXXXXXXXXXXXX
Oakland, California 94607
XXXXXXXXXXXXXXXXXXXXX
(415)

271-4320

Southern Pacific Railroad
1 Market Plaza
Southern Pacific Building
Suite 225
San Francisco, CA 94105

Attn: Mr. Mayer

Re: 744 & 758 High Street in Oakland

Dear Mr. Mayer:

As part of a request for information from our files on 744 and 758 High Street in Oakland, a report containing analysis of soil samples from the subject site was submitted by Mr. C. J. Hollander for evaluation.

As can be seen from the attached letter by this office to Mr. Hollander, the report by Property Contamination Control and Alpha Chemical and Biomedical Laboratories showed contaminants were discovered in the surface and subsurface soils that exceed the state threshold levels and the Regional Water Quality Control Board action levels for remediation.

In light of the information now available to this office, the Southern Pacific property with the given addresses of 744 and 758 High Street in Oakland is considered to have soil and/or ground water contamination that will require investigation and/or clean up. A plan of correction per the requirements of 22 CCR section 66328 will be required. This plan is to include, but is not limited to the following information:

I. Introduction

- A. Statement of scope of work
- B. Site location showing location of discovered contamination
- C. Site history

- describe any previous subsurface work at the site or adjacent sites

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II. Site Description

- A. Vicinity description including hydrogeologic setting
- B. Existing soil contamination and excavation results
 - provide sampling procedures used
 - indicate depth to ground water

III. Plan for determining extent of soil contamination on site

- A. Describe method for determining extent of contamination
 - identify subcontractors, if any
 - identify methods or techniques used for analysis
 - provide accurate sampling map showing lines of excavation, and sampling points
 - provide chain of custody forms, lab analysis results identity of sampler
- B. Describe method and criteria for screening clean versus contaminated soil. If onsite soil remediation or 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

C. Describe security measures

IV. Plan for determining ground water contamination

- Construction and placement of wells should adhere to the requirements of the Regional Water Quality Control Board, Toxics Division. Provide a description of placement and rationale for the location of monitoring wells including a map to scale.

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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 slot sizing
- development method and criteria for adequacy of development
- plans for cuttings and development water

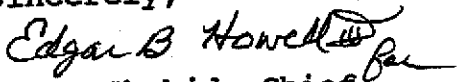
B. Ground water sampling plan

- observation of sheen
- well purging procedures
- sample collection procedures
- chain of custody procedures

Please submit your plan for this site within twenty five days from the above letter date. Implementation of remediation plans may begin before acceptance and approval of the work plan. Final approval for site sign off by this office, though, will depend on the adequacy of work done per the above requirements. Final site sign off will remain the responsibility if the RWQCB.

Should you have any questions concerning the contents of this letter, please contact Hazardous Materials Specialist, Ariu Levi. Mr. Levi can be reached at 415-271-4320.

Sincerely,


Rafat Shahid, Chief,
Hazardous Materials Program

cc: Lester Feldman, RWQCB
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Howard Hatayama, DOHS

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

DAVID J. KEARS, AGENCY
DIRECTOR, Agency Director



Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

R01135 (744 High)

March 2, 1989

~~AGENCY HEADQUARTERS~~
~~498 Fifth Street~~
~~OAKLAND, CALIFORNIA 94607~~
(415) 271-4320

C. Jay Hollander
501 Cliffside Court
Pt. Richmond, CA 94801

Re: 744 & 758 High Street in Oakland

Dear Mr. Hollander:

As requested in your letter dated December 1, 1988, a review was made of information on the environmental condition of property currently owned by Southern Pacific Railroad with the given addresses of 758 and 744 High Street in Oakland. The following response was based on information contained within our files, and a report provided by yourself that contained the results of soil sampling conducted by Property Contamination Control Inc. and evaluated by Alpha Chemical and Biomedical Laboratories.

Prior to the development of this letter and the release of the following information, Mr. Mayer acting as agent for Southern Pacific Railroad was contacted and informed of your interests. Mr. Mayer was made aware of the report produced by Property Contamination Control Inc. and provided to this office by yourself. His right to contest this office's intent to release information contained within the files on the above noted addresses was also discussed. Mr. Mayer requested, to which this office agreed, that a copy of this letter be sent to Southern Pacific.

This office inspected businesses that previously operated from the SP property off High Street in Oakland in March of 1988. In the process of researching this response questions arose concerning the correct address numbers assigned to the SP property. Discussions with the city assessors office and SP left this issue unresolved. It appears from our records and other sources that 744, 758, and 774 may have or have been used or assigned to this parcel irrespective of the sequence problem relative to the other addresses on the street. With that understood these three addresses will be called the SP property.

Kayak America Works with the given address of 774 High Street operated from the front building of the SP property. KAW worked as an auto body repair shop. Upon inspection, this facility had four violations of Title 22, California Code of regulations. The noted

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violations were in the nature of improper labelling of hazardous waste, accumulation time of waste, and the absence of an EPA number.

Scrap Metal Supply with the given address of 758 High Street operated from the rear portion of the front building and the rest of the SP parcel. SMS operated as a metal recycler. In addition to standard scrap, SMS also accepted wet batteries for recycling. At the time of inspection nine violations of Title 22, California Code of Regulations were noted. The violations were in the nature of improper labelling of hazardous waste, lack of an EPA number, improper storage practices of hazardous waste, failure to maintain onsite records of waste removal, and accumulation time for onsite storage of waste. SMS was also given an AB2185 form to complete and return for which SMS failed to meet the thirty day response requirement.

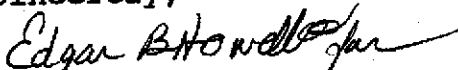
Property Contamination Control conducted sampling at the SP property in July of 1988. Sampling was done from surface to one foot depth at seven different points with nine discrete and twelve to develop three composites being submitted. The sampling discovered total oil and grease to 4565 ppm by discrete and 5920 ppm by composite, PCBs to 260 ppm by discrete and 8.6 ppm by composite (50 ppm TTLC), volatile organic compounds including benzene, toluene, xylene, halogenated organic compounds, and heavy metals(see attached page).

In light of the available information the above referenced parcel is considered to have soil and/or ground water contamination that will require investigation and/or cleanup. A plan of correction per the requirements of 22 CCR section 66328 will be required.

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Should you have any questions concerning the contents of this letter, please contact Hazardous Materials Specialist, Ariu Levi. Mr. Levi can be reached at 415-271-4320.

Sincerely,


Rafat Shahid, Chief,
Hazardous Materials Program

cc: Lester Feldman, RWQCB
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Howard Hatayama, DOHS
Mr. Mayer, Southern Pacific
Files

8/1/88: Alpha Chemical & Biomedical Laboratories to Property Contamination Control; lab results for 12 samples with 9 from 3 different sites and 3 a composite from 4 different sites (map provided). The samples were taken from surface to 12 inches deep. Each of the 4 groups of 3 samples were run for VOCs, priority metals, PCBs, and TOG. The results follow:

Group 1: TOG to 4565 ppm
 PCBs to 260 ppm
 Sol Pb not Quant. - ?
 Methylene Chloride to 8.5 ppb
 Toluene to 1.3 ppb
 Xylene to 1.3 ppb
 Benzene detected but not quant. - ?

Group 2: TOG to 58 ppm
 Methylene Chloride to 2.1 ppb
 Benzene detected but not quant. - ?

Group 3: TOG to 2785 ppm
 Trichlororfluoromethane to 1 ppb
 Methylene Chloride to 3.2 ppb
 Benzene detected but not quant. - ?

Group 4: (COMPOSITE)
 TOG to 5920 ppm
 PCBs to 8.6 ppm
 Sol. Copper to .525 ppm
 Sol. lead to .339 ppm
 VOC test inconclusive due to concentrated presence of TOG

- TOG levels require remediation
 Monitoring wells will be required
 Soils in excess of 1,000 ppm will be considered hazardous waste.

A plan of correction will be required.
 - Soluble lead discovered in group 1 but not quantified. Possible problem.

- PCB level requires remediation
 TTLC limit = 50 ppm
 Group 1 sample discovered levels to 260 ppm. Group 4 was a composite from 4 sites. Group 4 discovered 8.6 ppm.

- Ground water monitoring wells required. VOCs discovered through out.
 Presence of BTX discovered. TPH test should be considered.

Discovery of contaminants indicates further site evaluation required, i.e., vertical and lateral extent of contamination must be identified.