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A Site Closure Report Prepared for

Valley Auto Center 6015 Scarlet Court Dublin, California 94568

SITE CLOSURE REPORT at 5787 Scarlet Court Dublin, California 94568

June 6, 1994

Prepared By:

Project Engineer

Reviewed By:

Louis B. Schipper Registered Geologist June 6, 1994

Mr. Jeff Qvale KJB Development 901 Van Ness Avenue San Francisco, CA 94109

RE: SITE CLOSURE REPORT

5787 SCARLET COURT, DUBLIN, CALIFORNIA

Dear Mr. Qvale:

REACT Environmental Services Inc. is please to present the attached site closure report which summarizes the activities associated with the above site soil and groundwater clean up and the final groundwater monitoring.

REACT recommends that Valley Auto Center forward a copy of this report to:

Ms. Eva Chu Hazardous Materials Specialist Alameda County Health Care Services Department of Environmental Health 80 Swan Way, Room 200 Oakland, CA 94612

Eddy So Regional Water Quality Control Board 2101 Webster Avenue Oakland, CA 94612

We appreciate the opportunity of providing this service to you. If you have any questions regarding the attached report, please call us at (800) 851-6407.

Sincerely,

REACT Environmental Services Corp.

Bradd Statley, REA Senior Project Engineer

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SITE CLOSURE REPORT at 5787 Scarlet Court Dublin, California 94568

1.0 INTRODUCTION

REACT Environmental Services was retained by Valley Auto Center to submit a written report to Alameda County Department of Environmental Health (ACDEH) that will support that Agency's request for site closure at the property located at 5787 Scarlet Court, Dublin California. This report summarizes the activities on which this request is based.

1.1 Purpose

The preparation of this report was to review and evaluate existing data which has been submitted to ACDEH, documenting the activities associated with the site clean-up and shallow groundwater investigation, and to make recommendations regarding possible site closure.

1.2 Limitations

This investigative report was prepared in a manner consistent with the level of care and skill ordinarily exercised by members of the profession currently practicing in the same area under similar conditions. Because the analytical results are based on sampling point locations collected by others, REACT cannot have full knowledge of the underlaying conditions at the site. Conditions may change with time due to works of man and/or acts of nature. Accordingly, the findings of this report may be subject to change in light of any new information.

The conclusions and recommendations made in this report are based on review of the case documents submitted to ACDEH; no warranty or guarantee, expressed or implied, is made by REACT as to the validity of any information produced by others.

This report was prepared for the sole use of Valley Auto Center, the only intended beneficiary of our work. No other parties shall rely on the information contained herein without the prior consent of REACT.

2.0 SITE DESCRIPTION AND HYDROLOGY

2.1 Site Description

The subject site is located at 5787 Scarlet Court, in Dublin, California; approximately one mile east of highway 680 and 1500 feet north of Highway 580 (Plate 1). The property is a relatively flat, mostly paved, triangular-shaped parcel bounded on the north and east by an unlined drainage ditch adjacent to an old Southern Pacific Railroad grade. The unused rail-bed separates the site from vacant land at the Camp Parks military facility. The site is bounded on the south by 84 Lumber and on the west by Valley Auto Center (Plate 2).

One, single-story, metal warehouse building is located on the property and is used as a auto body repair shop. The paved, fenced portion of the property, northeast of the auto body shop, is currently used by Valley Auto Center as a parking lot for new vehicles.

A water well, immediately adjacent to the east wall of the existing metal building, was installed on June 30, 1969 and is identified and listed with the Alameda County Flood Control and Water Management District as Well #3S/1E-6G5. The well is reported as having a total depth of 200 feet with perforations at 103 to 106 feet and 173 to 178 feet. The declared use, at the time of installation, was for landscape irrigation.

2.2 Regional and Local Hydrogeology

The subject site is within the San Ramon sub-basin of the Livermore Valley groundwater basin. The two main water-bearing formations of this basin are the Livermore formation, an alluvial gravel, and the overlying reworked alluvium. The San Ramon groundwater sub-basin is completely overlain by a thick, relatively impermeable clay barrier which acts as an aquitard, restricting any vertical movement of shallow groundwater into the underlying, water-bearing units.

Shallow groundwater data collected during site investigations indicated that the groundwater flows from the northeast to the southwest, following local topographic trends; this is also consistent with the groundwater data collected at the nearby Scotsman Corp. site. Groundwater flow in the underlying alluvial formation is also estimated to flow in this same general direction. The average depth to shallow groundwater at the site is approximately 4.68 feet which converts to an approximate

¹Richardson, Louis A., "Progress Report and Workplan for Site of Unauthorized Release from Underground Fuel Tanks at 5787 Scarlett Court, Dublin, California," page 3, June 12, 1989.

groundwater elevation of 322.95 feet (MSL).² Groundwater elevations may fluctuate several feet due to the amount of seasonal precipitation.

3.0 BACKGROUND

3.1 Site History

In 1968, Demar Plastering Company (DPC) purchased the undeveloped property from John and Mary Crowell. DPC constructed the metal warehouse building in 1969, and in 1970, installed two 12,000 gallon underground fuel storage tanks for fueling vehicles. DPC used the site as a local office and warehouse until 1986 when it was sold to Land S. Ranches (a company owned be Lew Doty Cadillac). KJB Development purchased the property from Lew Doty around 1990 and is now the current owner.

3.2 Release Discovery

A subsurface site investigation was conducted in June, 1988 by Certified Engineering and Testing Co., who were retained by the Law Firm of Broad, Schultz, Larson and Wineberg for the purposes of a site assessment. This investigation detected the presence of petroleum hydrocarbons and purgeable aromatic compounds, in both soil and shallow groundwater, within the immediate vicinity of the two underground gasoline tanks. An unauthorized release form was subsequently obtained and submitted to ACDEH on March 16, 1989.

4.0 PREVIOUS WORK/REMEDIATION ACTIVITIES

4.1 Tank Removals

The two 12,000 gallon gasoline tanks were removed on October 28, 1988 by Atlas Hydraulic Corporation (Atlas). The tanks were observed to have holes caused by corrosion of the steel walls. Soil and shallow groundwater, adjacent to and beneath the tanks, were tested and found contaminated with petroleum hydrocarbons as gasoline and purgeable aromatic compounds. The total quantity of lost product was not determined.

4.2 Source Removal - Soil and Groundwater Remediation

Site remediation activities are presented in chronological order:

²Elevations taken from Clayton Environmental Consultant's April 8, 1993 Groundwater Sampling Report.

A Progress Report prepared by Louis A Richardson, a private consulting engineering geologist retained by Lew Doty Cadillac, dated June 12, 1989 indicated that approximately 10,000 gallons of petroleum contaminated groundwater was vacuumed from the tank pit excavation and hauled away by H&H Ship Services for disposal on November 3 and 4, 1988 (Clayton Environmental Consultant's January 1990 report indicated that only 5,000 gallons of contaminated water was removed on these dates). Between October and November 1988, Atlas removed approximately 200 cubic yards of contaminated soil and proceeded to aerate the soil on-site. The aerated soil was to be returned to the excavation after test results indicated sufficient reduction in the levels of petroleum hydrocarbon contamination.

In a letter dated March 3, 1989, ACDEH gave approval to back-fill the excavation with aerated soil having concentration levels of TPH-G below 100 ppm. Backfilling of the original excavation was completed around April 10, 1989. Additional groundwater was pumped from the excavation prior to back-filling. This water was discharged into the sanitary sewer after a permit was received from the Dublin-San Ramon Sanitary Service District.³

Between April 15 and 20, 1989 Atlas removed an additional 300 cubic yards of contaminated soil around the perimeter of the back-filled tank pit. Soil was excavated from surface grade to a total depth equal to the static groundwater elevation. Soil samples taken from the sidewalls of the excavation indicated that further removal of contaminated soil would be necessary.

In a letter dated June 28, 1989, ACDEH requested that three groundwater monitoring wells be constructed to monitor the local impact to shallow groundwater and to delineate the local groundwater gradient. This letter also reported on the Regional Water Quality Control Board's (RWQCB) decision to prohibit the practice of returning petroleum contaminated soil, with concentration levels of TPH-g below 100 ppm, back to the site excavation.

On January 22 and 23, 1990, Clayton Environmental Consultants, Inc. (Clayton) conducted the field portion of a subsurface soil and groundwater investigation in which four groundwater monitoring wells (MW-1 through MW-4) were constructed and sampled. Clayton's resulting investigation report recommended further soil excavation.

Between August 7 and 28, 1990, Decon Environmental Services, under subcontract to Clayton, excavated an additional 560 cubic yards of contaminated soil from the affected areas on-site. During this event monitoring wells MW-1 and MW-2 were destroyed after proper permits, from Alameda County Flood Control District's Zone 7, were obtained. Soil samples were collected from the sidewalls of the excavation to

³Progress Report and Workplan dated June 12, 1989 by Louis A. Richardson, Consulting Engineering Geologist.

confirm that soil left in-place had concentrations of total petroleum hydrocarbons as gasoline (TPH-G) and benzene, Toluene, ethyl benzene, and total xylenes (BTEX) that were lower than Leaking Underground Fuel Tank (LUFT) manual guidelines, category 2.

On August 31, 1990, Clayton installed monitoring well MW-5. This well was placed within 10 feet of the perimeter of the excavation area and directly down-gradient of the former monitoring well MW-2.

Between August and October 1990, Clayton pumped a total of 39,000 gallons of contaminated groundwater from the open excavation into an on-site storage tank. This water was air sparged to remove volatile organic compounds. After laboratory analysis and the necessary permits from San Ramon Dublin Service District, the treated water was discharged into the sewer system.

ACDEH's letter dated October 25, 1990 allowed for soil that had been aerated, below the acceptable county levels for soil contaminated with TPH-g and BTEX, to be returned to the excavation. Soil that had not been aerated could not be returned to the excavation. A copy of this letter is attached as Appendix A. Approximately 300 cubic yards of aerated soil was returned to the excavation shortly after ACDEH's authorization.

Between January and April of 1991, Clayton aerated and periodically sampled the remaining 450 cubic yards of contaminated soil. ACDEH's letter dated May 13, 1991 permitted the remaining soil to be returned to the excavation. A copy of this letter is attached as Appendix B.

Analytical results from the aerated soil piles are not presented in this report. It is REACT's opinion that the letters from ACDEH are enough documentation to confirm that sampling results and locations from these piles had been adequately reviewed by ACDEH and that all conditions for returning this soil back to the ground had been achieved.

A final overview of the sampling locations, taken from the perimeter of the excavation, is presented in Plate 3. Table 1 summarizes the results of soil samples taken from the perimeter of the excavation and from the soil borings outside the perimeter of the excavation.

5.0 GROUNDWATER MONITORING

Groundwater samples were collected from monitoring wells MW-1 through MW-4 on January 26, 1990. Groundwater sampled in MW-2 exceeded the ACDEH's action levels for benzene. Groundwater samples from MW-3 and MW-4 were below the limits

of detection for the constituents analyzed. Groundwater sampled from MW-1 had detectable concentrations of TPH-g, xylene, and ethyl benzene, but well below ACDEH action levels.⁴ Results from this sampling event are presented in Table 3.

Since the destruction of monitoring wells MW-1 and MW-2 and the removal of approximately 54,000 gallons of contaminated groundwater, four groundwater sampling events were recorded between January 24, 1991 and October 8, 1993 by Clayton Environmental Consultants and REACT. Groundwater samples, taken during these sampling events from the three monitoring wells, MW-3, MW-4, and MW-5, indicated low to non-detectable concentrations of TPH-G and BTEX.

ACDEH's letter dated October 21, 1993 (Appendix C) recommended that a petition for site closure should be submitted if the next quarter sampling event (in February 1994) indicates no detectable levels of hydrocarbons.

On February 5, 1994, groundwater samples were obtained from the three wells and submitted for analysis. Laboratory data indicated all three samples were below the limits of detection for TPH-G and BTEX. Table 3 summarizes these and previous groundwater sampling results.

6.0 CONCLUSION AND RECOMMENDATIONS

6.1 <u>Conclusion</u>

A review of all the documents that were on file at ACDEH indicated that most of the hydrocarbon contaminates were removed from the area surrounding the former tank pit. Contamination along the northeast property line was left in place due to a buried high pressure water line. Groundwater data collected during the duration of this cleanup and investigation indicates that this residual contaminated soil has caused no significant impact to the shallow groundwater in this location. The removal of this residual contaminated soil, next to the high pressure water line, was not required by ACDEH. According to ACDEH's April 30, 1990 letter to Valley Nissan, ACDEH states that, "except for a small amount of residual contamination around MW-2, we feel that the soil issue has been dealt with adequately" (copy of letter attached as Appendix D). Soil around MW-2 was subsequently over excavated and the sidewalls resampled.

None of the reports which REACT reviewed (Louis Richardson Consulting Engineering Geologist and Clayton Environmental Consultants) made any indication as to the depths at which the sidewall samples, along the perimeter of the excavation, were

⁴Action levels during this sampling event were reported (in mg/L) as 0.0007 for Benzene, 0.1 for Toluene, 0.68 for Xylene, 0.62 for Ethyl benzene, and levels for TPH-q were not available.

taken. We will make the assumption, therefore, that proper professional judgement was used by these workers and that samples were taken at depths within the capillary fringe or locations that would best indicate the horizontal and vertical movement of the contaminates. Table 1 summarizes the results of all the sidewalls samples from the perimeter excavation. Plate 3 shows the final sampling locations of the excavation along with soil boring and monitoring well locations.

The removal of over 54,000 gallons of contaminated groundwater during the site cleanup, apparently, removed most of the originally contaminated groundwater. Contamination in MW-1 and MW-2, compared with low to non-detectable concentrations in MW-3, MW-4, and MW-5, indicate that the groundwater contamination seemed to be localized near the original tank pit. Continued monitoring of MW-3, MW-4, and MW-5 indicates that migration of possible contamination away from the pit area has not occurred.

6.2 Recommendations

Based on the results of the reviewed investigations, REACT judges that the contaminate left in place has caused no significant impact to the water quality of the shallow groundwater at the site. It is unlikely that any remaining contaminates left in the northeast wall of the excavation will cause significant off-site risk since the local shallow groundwater flow has consistently been found to be in the southwesterly direction.

It is unlikely that the spill will cause any impact to the nearby irrigation well since this well draws water from a deeper depth. Screened intervals are almost 100 feet below the shallow groundwater's static water level.

REACT recommends that Valley Auto Center submit this closure report to the ACDEH and the RWQCB to review this case for site closure. Upon RWQCB's approval, the three groundwater monitoring wells, along with the one recovery well, should be properly destroyed in accordance with Zone 7's District Guidelines.

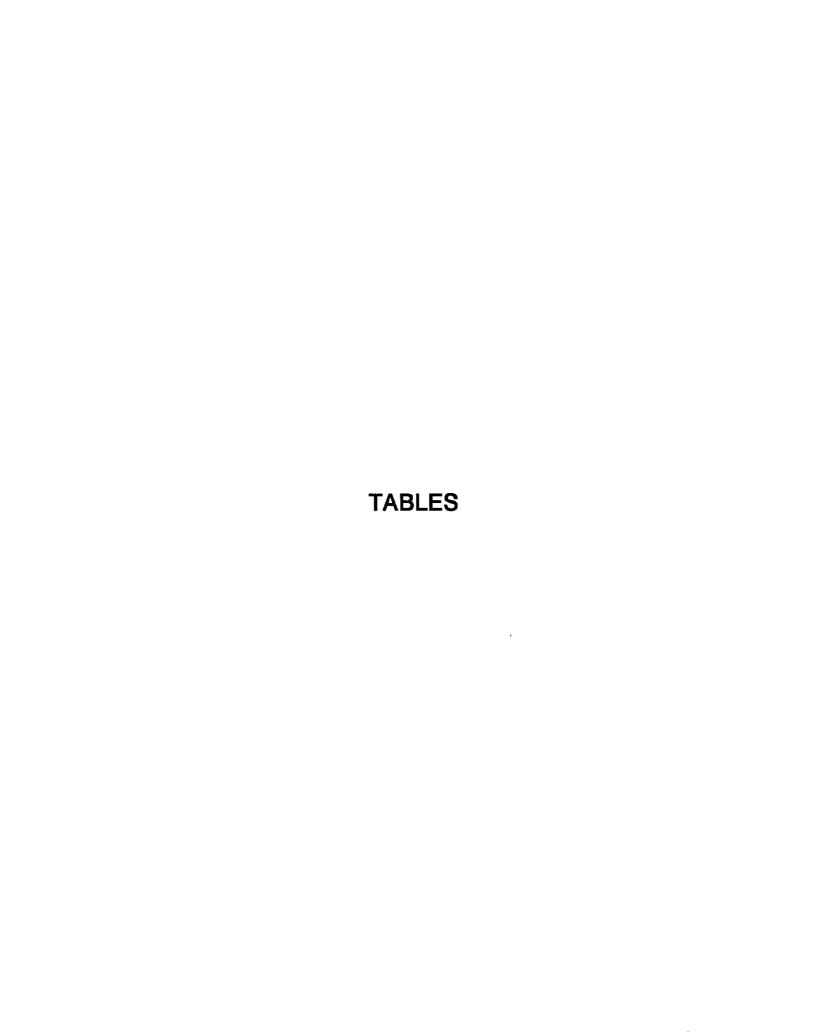


TABLE 1
SUMMARY OF SOIL SAMPLING RESULTS FROM SOIL BORINGS AND EXCAVATION (concentrations in mg/kg)

LOCATION	DATE SAMPLED	TPH-G	BENZENE	TOLUENE	ETHYL BENZENE	TOTAL XYLENES
MW-1-5.5	1-22-90	89	<0.1	0.2	2.1	0.6
MW-1-10.5	1-22-90	<0.3	<0.005	0.015	<0.005	<0.005
MW-1-15.5	1-22-90	<0.03	<0.005	<0.005	<0.005	<0.005
MW-2-3	1-22-90	40	0.7	2.7	1.3	4.6
MW-2-9.5	1-22-90	760	8	<5	17	6
MW-2-14.5	1-22-90	44	0.22	0.1	0.45	0.4
MW-3-4.5	1-22-90	1.4	<0.005	0.6	<0.005	0.008
MW-3-9.5	1-22-90	<0.3	<0.005	0.016	<0.005	< 0.005
MW-3-15	1-22-90	<0.3	<0.005	<0.005	<0.005	<0.005
MW-4-5.5	1-22-90	<0.3	<0.005	0.17	<0.005	<0.005
MW-4-9.5	1-22-90	<0.3	<0.005	0.022	<0.005	<0.005
MW-5-5	8-31-90	ND	ND	ND	ND	ND
BH-1-4	1-22-90	88	0.2	<0.1	1.7	0.4
BH-1-9.5	1-22-90	3.8	0.32	0.011	0.14	0.068
BH-4-5.4	1-22-90	2.3	0.023	0.17	<0.005	0.009
BH-4-8.5	1-22-90	8.3	0.082	0.012	0.29	0.2
BH-5-5	1-22-90	<0.3	<0.005	0.075	<0.005	<0.005
BH-5-10	1-22-90	<0.3	<0.005	0.064	<0.005	<0.005
NW-2	8-13-90	0.9	ND	0.012	ND	ND
NW-3	8-13-90	30	ND	ND	.0600	0.150
WW-1	8-7-90	3.5	ND	0.005	0.008	0.016
WW-10	8-24-90	9	0.4	ND	0.25	0.04
WW-11	8-24-90	30	0.39	ND	0.8	0.13
SW-4	8-16-90	11	0.21	ND	0.140	0.06
EW-4	8-28-90	2	0.019	ND	0.058	ND
#22	4-19-89	960	NA	NA	NA	NA
LUFT CATEG. 2		100	0.3	0.3	1.0	1.0

TABLE 2							
SUMMARY OF GROUNDWATER LEVEL READINGS							
	MW-1	MW-2	MW-3	MW-4	MW-5		
TOTAL CASING DEPTH (FT)	15	18	14.21	18.92	13.92		
TOP OF CASING ELEV. (FT)	NA	NA	327.93	327.12	327.86		
WELL DIAMETER (INCHES)	4	4	4	4	4		
SCREEN LENGTH INTERVAL (Feet Below Grade)	NA	NA	NA	NA	NA		
Depth to Water (FT) 1/24/91			NA	NA	NA		
Depth to Water (FT) 3/9/93			3.00	3.00	3.17		
Depth to Water (FT) 6/29/93			4.91	4.61	5.11		
Depth to Water (FT) 10/8/93			5.68	5.34	5.94		
Depth to Water (FT) 2/5/94			5.09	4.90	5.43		

NA - Data Not Available

TABLE 3 SUMMARY OF GROUNDWATER SAMPLING RESULTS CONCENTRATION LEVELS IN mg/L

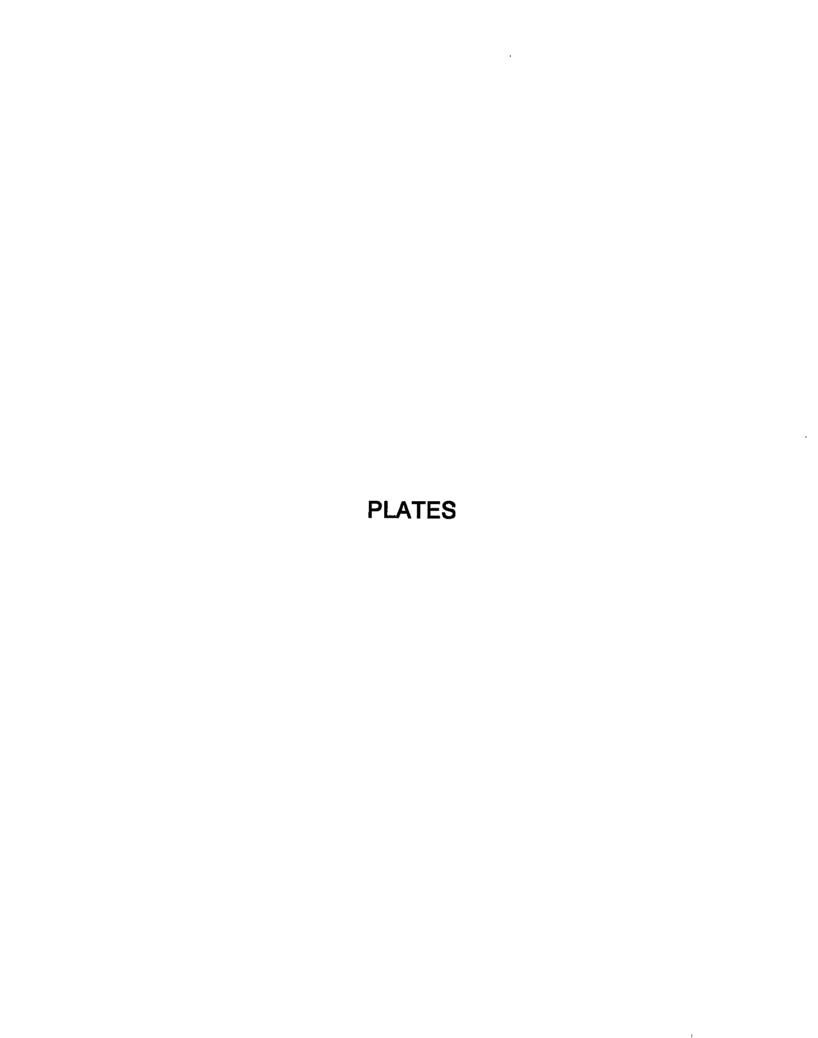
	MW-1	MW-2	мw-з	MW-4	MW-5
1/26/90 TPH-GASOLINE	0.08	8.3	ND	ND	
BENZENE	<0.0004	3.0	ND	ND	
TOLUENE	<0.0003	0.014	ND	ND	
ETHYL BENZENE	0.001	0.54	ND	ND	
TOTAL XYLENES	0.001	0.54	ND	ND	
1\24\91 TPH-GASOLINE		**	ND	ND	0.080
BENZENE			ND	ND	ND
TOLUENE	,		ND	ND	ND
ETHYL BENZENE			ND	ND	ND
TOTAL XYLENES			ND	ND	ND
3/9/93 TPH-GASOLINE			ND	ND	0.130
BENZENE			ND	ND	ND
TOLUENE			ND	ND	0.0009
ETHYL BENZENE			ND	ND	ND
TOTAL XYLENES			ND	ND	ND
6\29\93 TPH-GASOLINE			ND	ND	ND
BENZENE			ND	ND	ND
TOLUENE			ND	ND	ND
ETHYL BENZENE			ND	ND	ND
TOTAL XYLENES			ND	ND	ND
10/8/93 TPH-GASOLINE			ND	ND	ND
BENZENE			ND	ND	ND
TOLUENE	**		ND	ND	ND
ETHYL BENZENE			ND	ND	ND
TOTAL XYLENES			ND	ND	ND

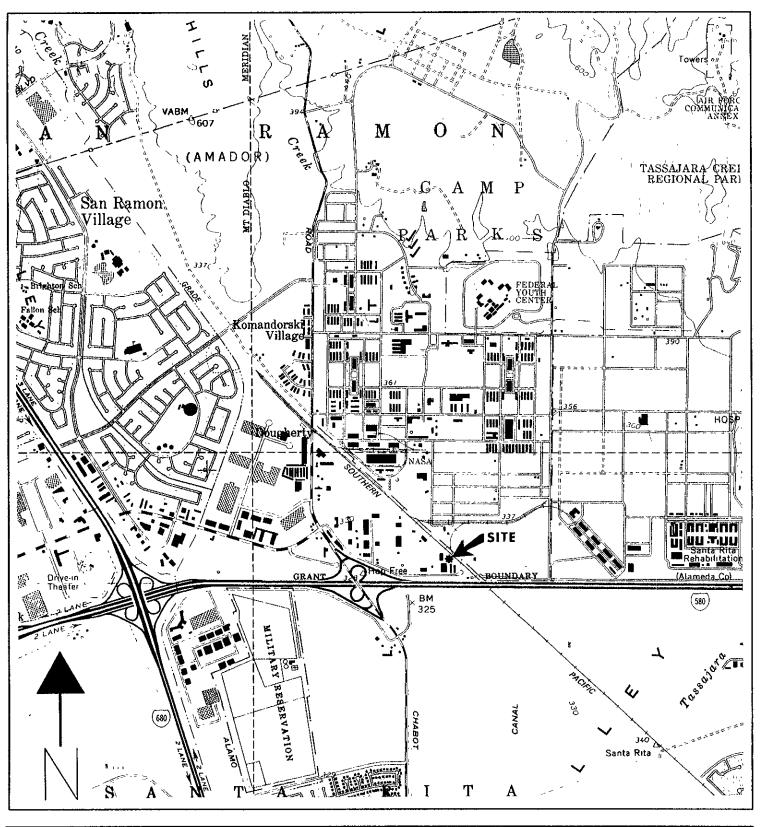
TABLE 3 SUMMARY OF GROUNDWATER SAMPLING RESULTS CONCENTRATION LEVELS IN mg/L

	MW-1	MW-2	MW-3	MW-4	MW-5
2/5/94 TPH-GASOLINE			ND	ND	ND
BENZENE			ND	ND	ND
ETHYL BENZENE			ND	ND	ND
TOTAL XYLENES			ND	ND	ND

ND - NOT DETECTED NA - NOT ANALYZED

^{*} MW-1 and MW-2 were removed in August 1990.
** MW-5 was constructed August 31, 1990.





PLATE

DRAWN BY:
B. STATLEY 6/2/94

FILE PROJ. NUMBER
VNDPLATI REACT9404

SERVICES CORP.

I42 N. SNEADE AVE.
EAGLE, DATE
B. STATLEY 6/2/94

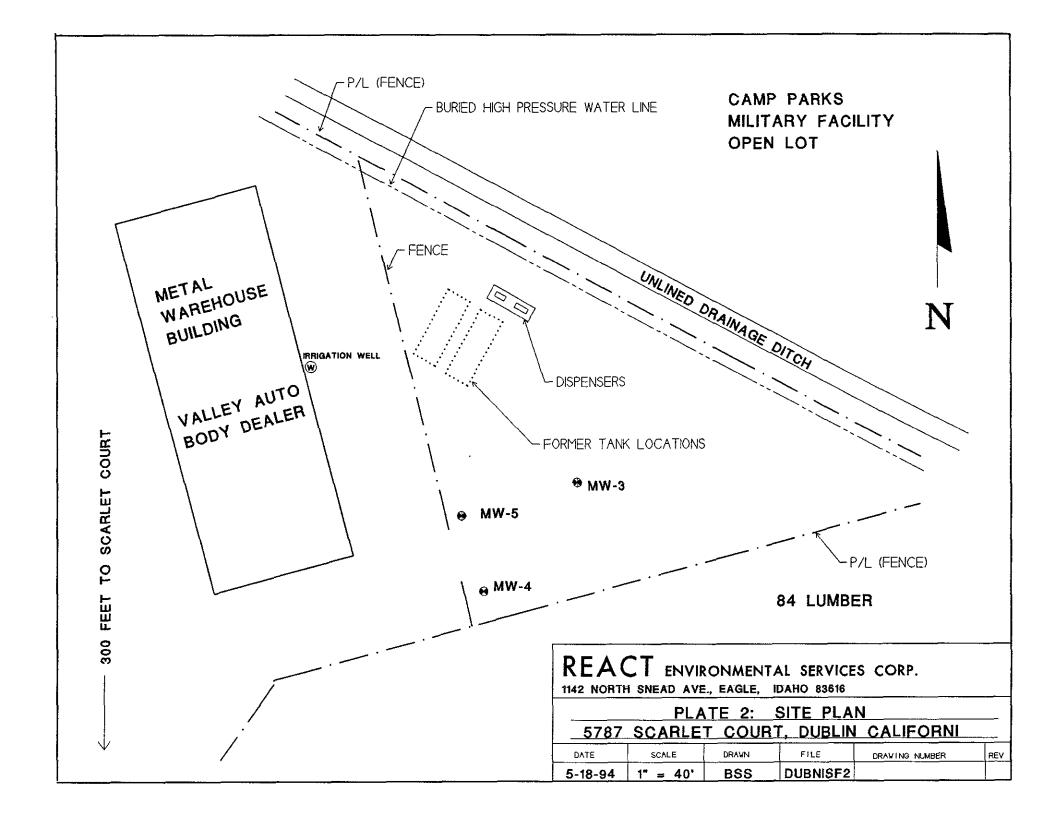
VNDPLATI REACT9404

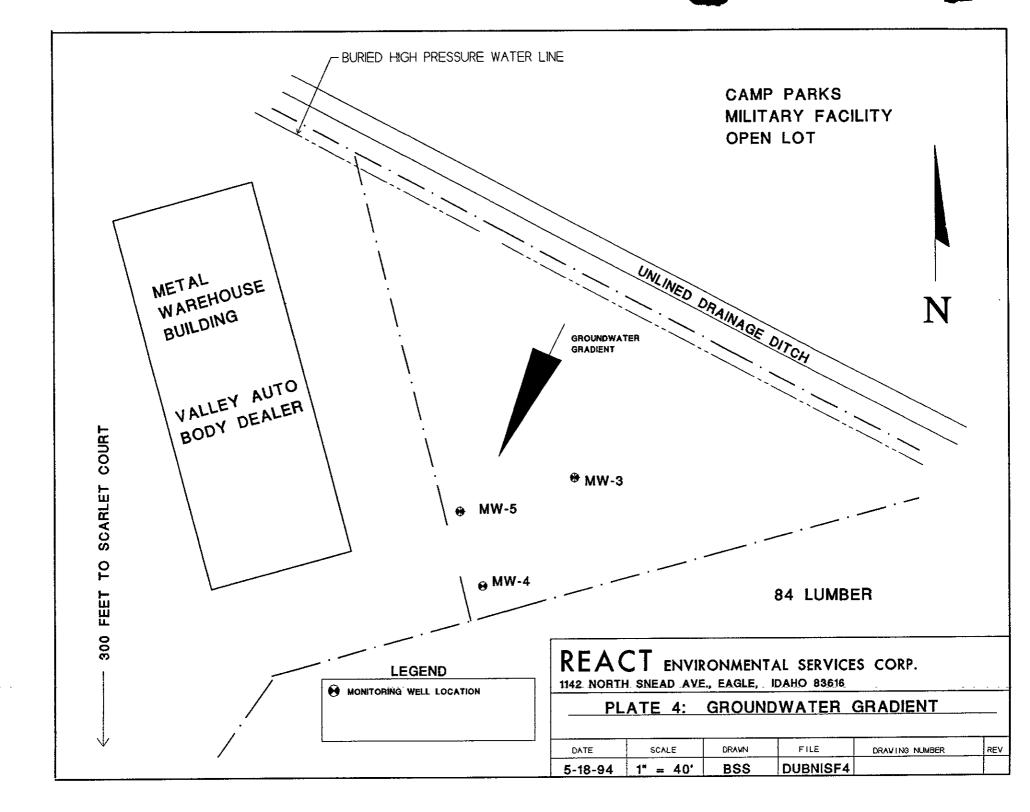
SCALE I"=24000" REV

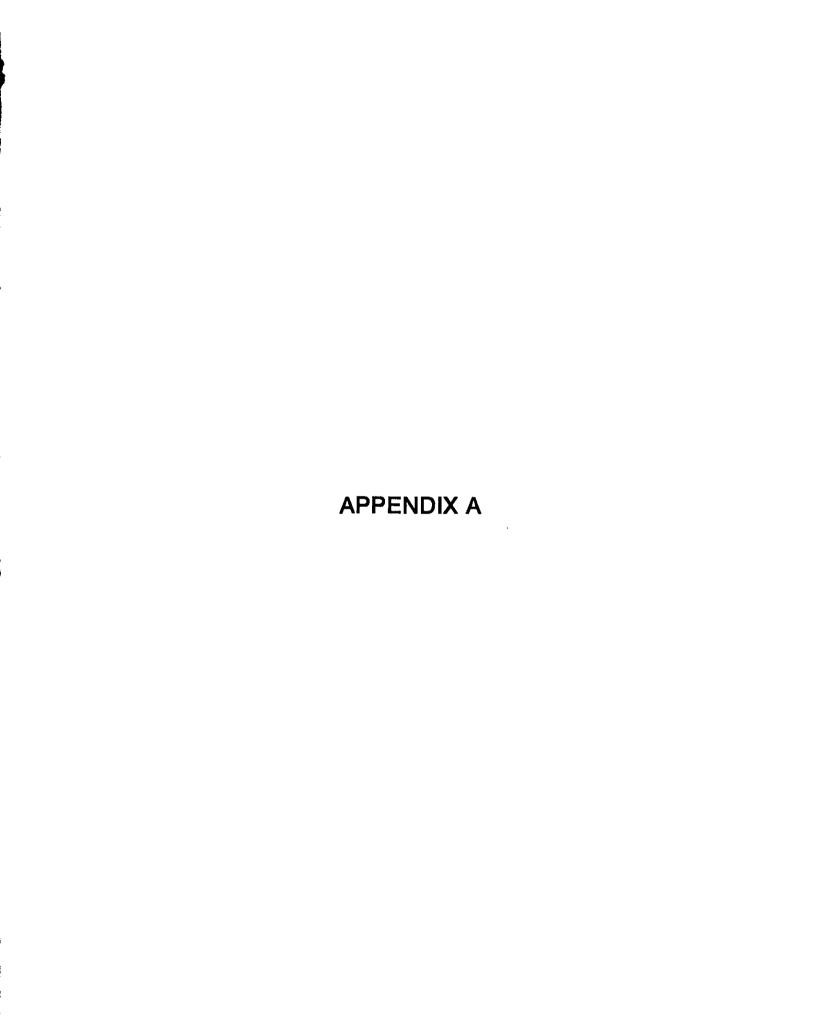
SOURCE:
USGS 7.5 MINUTE SERES (TOPOGRAPHIC)
DUBLIN. CALFFORNA QUADRANGLE

STE VICINITY MAP

VALLEY AUTO CENTER
5787 SCARLET COURT
DUBLIN. CA 94568







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)

October 25, 1990

Mr. Chris Regalia Valley Nissan 6015 Scarlett Ct. Dublin, CA 94568

Dear Mr. Regalia:

The Alameda County Department of Environmental Health, Hazardous Materials Division has reviewed the interim report prepared by Clayton Environmental Consultants on the remediation occurring at 5787 Scarlett Ct. Clayton has sought our approval on returning soil to the excavation pit, to make room for aeration of the remaining contaminated soil.

Based on the soil sampling strategy, the analytical results submitted, as well as on a conversation with Mr. Dastmalchi at Clayton, we have no objection to the aerated soil's being returned to the pit. This does not, of course, include soil that has been excavated but not yet aerated.

If you have any questions about this letter, please contact me at 271-4320.

Sincerely,

Gil Wistar

Ziller M. Wisa

Hazardous Materials Specialist

cc: Dariush Dastmalchi, Clayton Environmental (1252 Quarry Ln., Pleasanton, CA 94566)

Tom Hathcox, Dougherty Regional FD

Lester Feldman, RWQCB

Rafat A. Shahid, Asst. Agency Director, Environmental Health files

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APPENDIX B

DAVID J. KEARS, Agency Director

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

May 13, 1991

Mr. Bruce Qvale Valley Nissan/Dodge 6015 Scarlett Ct. Dublin, CA 94568

Dear Mr. Ovale:

Over the past several months, the Alameda County Department of Environmental Health, Hazardous Materials Division has reviewed a series of sampling and analytical reports on stockpiled soil at 5787 Scarlett Ct. Based on these reports, which indicate that this soil contains less than 10 ppm of hydrocarbons, we will permit the soil to be replaced in the former tank pit.

Please note that quarterly groundwater at the site should continue until all wells show "non-detect" levels for at least four consecutive monitoring periods.

If you have any questions concerning this letter, please contact the undersigned at 271-4320.

Sincerely,

Gil Wistar

Hazardous Materials Specialist

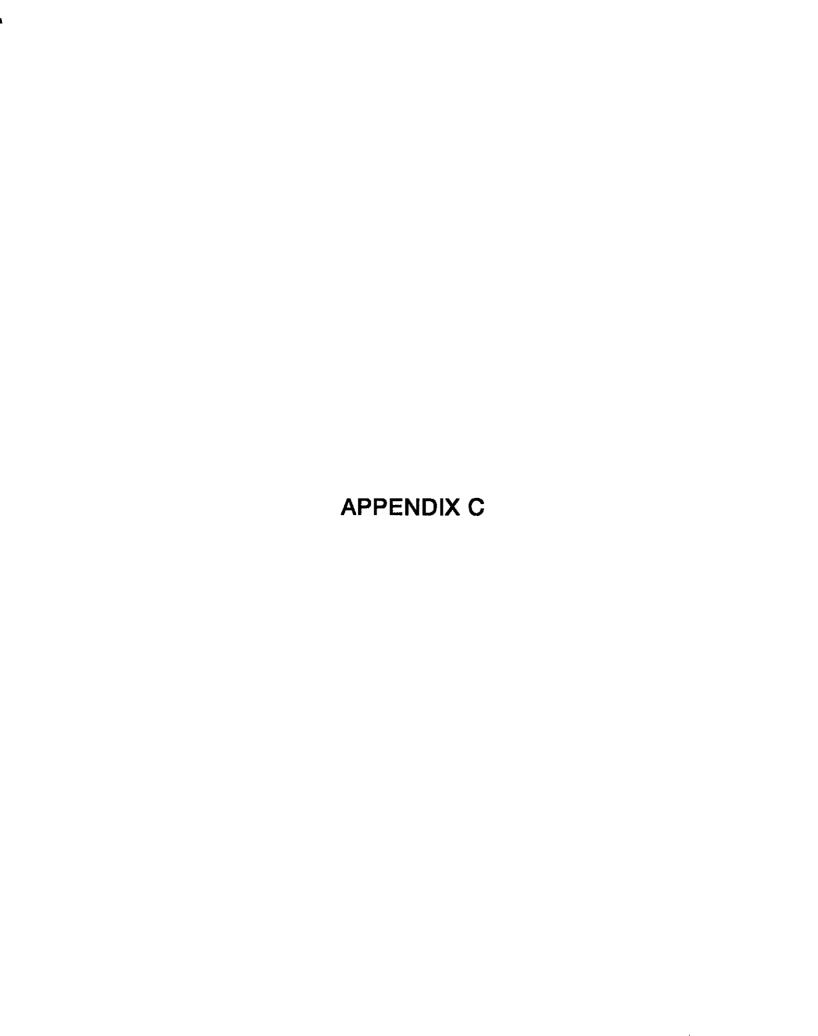
Dariush Dastmalchi, Clayton Environmental Consultants (P.O. Box cc: 9019, Pleasanton, CA 94566)

Lester Feldman, RWQCB

Tom Hathcox, Dougherty Regional Fire Authority

Rafat A. Shahid, Asst. Agency Director, Environmental Health files

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



Scott Euresonmentol

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621

akland, CA 94621 (510) 271-4530

StID 3762

October 21, 1993

Mr. Bradd Statley REACT 3351 El Camino Real, Suite 221 Atherton, CA 94027

Subject: Case Closure Report for Valley Auto Center, 6015 Scarlett Ct., Dublin, CA 94568

Dear Mr. Statley:

I have completed review of REACT's October 1993 Quarterly Monitoring Well Sampling Report for the above referenced site. For three consecutive quarters laboratory analyses of groundwater only detected non detectable to low levels of hydrocarbon contaminants. Should the results of the fourth quarter sampling event continue with this trend, a case closure report may be submitted at that time. Attached, please find a copy of the RWQCB outline showing the appropriate format and topics for the preparation of a final report summarizing the outcome of the site investigation. You are encouraged to evaluate the data generated to date in this project to identify any data gaps which may prevent this agency and the RWQCB from concurring with your bid The final closure report should be submitted for site closure. under seal of a California Registered Geologist, Certified Engineering Geologist, or Registered Civil Engineer.

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

Sincerely,

eva chu

Hazardous Materials Specialist

enclosure

cc: Ron Imperiale, Valley Auto Center, 6015 Scarlett Ct., Dublin, CA 94568

Bruce Qvale, 901 Van Ness Ave., San Francisco 94109

files

qvale4

De 10-15-92



DAVID J. KEARS, Agency Director

April 30, 1990

Mr. Christopher M. Regalia Valley Nissan 6015 Scarlett Ct. Dublin, CA 94568 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program
30 Swan Way, Rm. 200
Cakland, CA 94621
(415)

RE: Clayton Environmental Consultants' report on the old Lew Doty property, 5787 Scarlett Ct., Dublin

Dear Mr. Regalia:

The Alameda County Department of Environmental Health, Hazardous Materials Division has reviewed the report referenced above, and has the following comments to make on it.

As you're probably aware, extensive soil excavation and aeration has occurred at this site since the two underground gasoline tanks were removed in late 1988. The Clayton report implies that significant volumes of contaminated soil still need to be excavated from the site; however, except for a small amount of residual contamination around MW-2, we feel that the soil issue has been dealt with adequately. Our concern focuses instead on groundwater.

Monitoring well MW-2 shows moderate amounts of TPH contamination and fairly high levels of benzene contamination. Wells MW-3 and MW-4, which are <u>presumed</u> to be downgradient, show no contamination, but for some inexplicable reason Clayton omits any discussion of groundwater levels in site wells, so that we can only guess the actual direction of shallow water flow. It turns out that good hydrological data has been collected at the nearby Scotsman Corp. site, and groundwater seems to flow to the south-southwest, <u>not</u> south-southeast as Clayton assumes. This would mean that monitoring wells MW-3 and MW-4 are not actually downgradient and that another well or wells would need to be drilled to define the "zero edge" of the hydrocarbon plume.

Therefore, water levels must be taken at this site as soon as possible (if this has not already been done), to enable a bona-fide determination of the groundwater gradient to be made. If the results confirm a south-southwest flow, you will have to install at least one additional monitoring well downgradient of well MW-2. Defining the plume is a first step that must be taken before consideration of a remedial plan.

In the report, Clayton recommends quarterly sampling only for wells MW-1 and MW-2, since the other wells contained no detectable hydrocarbons. It is Regional Water Board policy that <u>all</u> monitoring wells associated with a fuel leak case undergo quarterly sampling at

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a minimum, and we see no reason to waive such a requirement in this case. All wells must be sampled quarterly, and have their water levels measured to 0.01 foot.

Our office requires an additional deposit of \$300 to complete oversight of this case. Please remit this amount, along with a revised work plan that takes site-specific groundwater levels into account, by May 30, 1990. As always, all documents sent to this office must also be submitted to the Regional Water Quality Control Board in Oakland (attn: Lester Feldman). All documents must also be signed by a California-registered geologist or engineering geologist in order to be accepted by this office.

If you have any questions about this letter, please contact the undersigned at 271-4320.

Sincerely,

Gil Wistar

Silbert m Wiston

Hazardous Materials Specialist

cc: Dariush Dastmalchi, Clayton Environmental Consultants (1252 Quarry Ln., Pleasanton, CA 94566)

Tom Hathcox, Dougherty Regional FD

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Lester Feldman, RWQCB

Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection Division

Rafat A. Shahid, Asst. Agency Director, Environmental Health files