



ENVIRONMENTAL
PROTECTION

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Ms. Eva Chu
Hazardous Materials Specialist
Alameda County Health Care Services Agency
Environmental Health Services
Environmental Protection (LOP)
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

May 31, 2000

RE: Groundwater Halocarbon Closure Request for Runnels Industries, Inc., 3590 Enterprise Avenue, Hayward, CA

Dear Ms. Chu;

In 1996 Runnels Industries, Inc., had Blymer Engineers, Inc. perform a Phase I Environmental Site Assessment followed by a Phase II Environmental Site Assessment for their facility at 3590 Enterprise Avenue, Hayward, CA. During these investigations Blymer identified low levels of dissolved volatile halocarbon compounds in groundwater at the site and suggested that the data "appears to indicate on-site, and potentially, off-site sources". Blymer recommended additional work. The Alameda County Health Care Services Agency (ACHCSA) reviewed these documents and formally requested that additional work be performed. H₂OGEOL was requested by Runnels to perform these additional site investigations. Table 1 lists the pertinent documents prepared between April, 1996 and March, 1999. These documents are incorporated herein by reference.

Three volatile halocarbon compounds dominate the concern at the site: 1,1-dichloroethane (11-DCA); 1,1-dichloroethene (11-DCE); and trichloroethylene (TCE). Each of these compounds occur above its respective maximum contaminant level in at least one well: 11-DCA (B-7, MW-3, MW-5); 11-DEC (B-7, MW-3, MW-5); and TCE (B-7, MW-1 and MW-5). The combined concentration of all volatile halocarbon compounds has never exceeded 300 µg/L. The water bearing formation is not a potential source of drinking water and is above the require well seal depth. The presence of CIS-1,2-dichloroethene suggests ongoing biodegradation.

The potentiometric surface gradient, and presumably the groundwater flow direction, is generally westward, averaging South 73.2 degrees West. Two monitoring wells along the upgradient side (parallel to Whitesell Street) of the property have been sampled five times and one borehole was sampled one time. These three locations have persistently shown that the volatile halocarbons of concern (11-DCA, 11-DCE, and TCE) are entering the site from the upgradient side of the property, albeit at concentrations lower than midway (MW-5 for 11-DCA and 11-DCE) across the property. The TCE concentration is higher at downgradient well MW-1 than at upgradient well MW-2. These relationships are consistent with a pulsed or fragmented plume passing through the area from an unidentified upgradient source.

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The property immediately downgradient (west) of the Runnels property is the transmitter site of radio station KFAQ. This property extends westward over 1,000 feet according to the map provided by Blymer Engineers in their 1996 Phase I Environmental Investigation. Metallic objects over eight feet in height cannot be safely used at the site without lowering the output of the transmission and sustained operation, such a drill rig, would require temporary cessation of transmission. It is not practical to place monitoring wells on this property. Beyond the KFAQ property is open ground prior to the marshland and the old salt evaporation ponds (Figures 1 and 2).

Upgradient, east of the Runnels property, across Whitesell Street, is Mag Trucking followed by J & L Paving, and Allgood Industries, Inc., according to the map provided by Blymer Engineers in their 1996 Phase I Environmental Investigation.

North of Enterprise Avenue is the City of Hayward Wastewater Treatment Plant. South of the Runnels property is land occupied by Sensormatic and southeast is Rohm and Hass property, according to the map provided by Blymer Engineers in their 1996 Phase I Environmental Investigation. The Sensormatic property is separated by a railroad right-of-way and a drainage ditch,

ACHCSA provided a printout from their well inventory database current to June, 1991. From this data base there are no water supply wells within 1,000 feet of the Runnels property. Consequently there are no known human receptors. Future wells in this area are restricted by the economics of water supply, salinity conditions, seal depths, and a myriad of other constraints.

The potential impact to non-human receptors of groundwater concentrations of total volatile halocarbon compounds of less than 300 µg/L are unknown. Furthermore, it is unknown what concentrations are, or may be, beyond the KFAQ property.

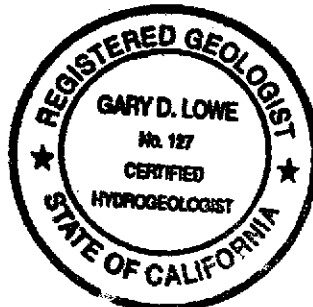
Closure of the case concerning Runnels Industries, Inc.'s involvement with volatile halocarbon compounds in groundwater in the neighborhood of their property, midway along the migration route from what appears to be an off site upgradient source is requested.

Please do not hesitate to call the undersigned at 925-373-9211 should you have any questions.

Sincerely,



Gary D. Lowe, R.G., C.E.G., C.HG.
Principal, Hydrogeologist



cc: Mr. Al Gant, Runnels Industries

TABLE 1
DOCUMENTS INCORPORATED BY REFERENCE
RUNNELS INDUSTRIES
3590 ENTERPRISE AVENUE, HAYWARD, CALIFORNIA 94545

Abbreviations: BEI = Blymer Engineers, Inc. | DECON = Decon Environmental Services, Inc. |
ACHCSA = Alameda County Health Care Services Agency | H₂OGEOL =
H₂OGEOL A GroundWater Consultancy, dba of Gary D. Lowe, RG., C.E.G., C. HG.

04/26/96	BEI	✓	Phase 1 Environmental Site Assessment Incorporates 06/18/93 Underground Storage Tank Closure Report prepared by DECON.
07/11/96	BEI	✓	Phase II Environmental Site Assessment
11/26/96	BEI	✓	Recommendations for Additional Work
01/15/97	ACHCSA	✓	No Title - Letter requiring additional work based on review of the three preceding BEI documents.
06/23/97	H ₂ OGEOL	✓	Workplan for Additional Site Investigation
07/16/97	H ₂ OGEOL	✓	Comment regarding June 23, 1997 Workplan
09/30/97	H ₂ OGEOL	✓	Additional Site Investigation
04/06/98	ACHCSA	✓	No Title - Letter requiring additional work based on review of the 09/30/97 Additional Site Investigation report.
04/30/98	H ₂ OGEOL	✓	Workplan for Groundwater Monitoring and Additional Investigations Near Borehole B-8.
05/26/98	H ₂ OGEOL	✓	First of Four Required Groundwater Monitoring Events (Second Quarter, 1998).
08/11/98	H ₂ OGEOL	✓	Additional Investigations Downgradient of Borehole B-8
08/28/98	H ₂ OGEOL	✓	Second of Four Required Groundwater Monitoring Events (Third Quarter, 1998).
11/10/98	H ₂ OGEOL	✓	Third of Four Required Groundwater Monitoring Events (Fourth Quarter, 1998).
03/01/99	H ₂ OGEOL	✓	Fourth of Four Required Groundwater Monitoring Events (First Quarter, 1999).

ENVIRONMENTAL
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00 APR 27 AM 9:01

Ms. Eva Chu
Hazardous Materials Specialist
Alameda County Health Care Services Agency
Environmental Health Services
Environmental Protection (LOP)
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

April 24, 2000

STD 6068

RE: Closure Request Clarification for Runnels Industries, Inc., 3590 Enterprise Avenue,
Hayward, CA

Dear Ms. Chu;

Runnels Industries, Inc., has requested that the undersigned prepare a closure request for the "open case" with the Alameda County Health Care Services Agency (ACHCSA) for their facility at 3590 Enterprise Avenue, Hayward, CA.

or files are complete.
In order to meet this goal you have reviewed the "case file" from the previous ACHCSA staff and I have reviewed documents in my files. The documents in my files will be incorporated by reference into the closure request. These documents are listed in attached Table 1. Please review this list and if there are any listed documents not in your files please advise me so that I can provide you a copy. Similarly, if the ACHCSA files contain any pertinent documents not included in the attached table please provide the undersigned with a copy.

From reviewing the documents listed in Table 1, it appears that the nature of the "open case" with the ACHCSA has never been clearly defined. As I interpret the 1996 through 1998 documents there are three "open cases", namely:

1. Acceptance of the 1993 Underground Storage Tank Closure Report prepared by DECON.
is this report available? Check w/ City of Hayward PD - Hugh Murphy
2. Closure (cessation and modernization) of the wastewater treatment practices resulting oily discharge in the vicinity of Borehole B-8. *A statement on new waste treatment practice*
3. Closure of site involvement with the below 0.2 ppm combined volatile halocarbon compounds in groundwater beneath the site for which a source and destination have not been determined. *Any historic use of TCE, 1,1-DCA or other solvents?*
4. *Blasting sand*

appendices to Blymes Phase I Rpt

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Please advise if this interpretation is consistent with that of ACHCSA.

Since the goal is to achieve "case closure" with ACHCSA, the undersigned feels that each of these issues should be addressed separately as they originated separately and have different regulatory basis.

Please do not hesitate to call the undersigned at 925-373-9211 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary D. Lowe", with a long horizontal flourish extending to the right.

Gary D. Lowe, R.G., C.E.G., C.HG.
Principal, Hydrogeologist

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03/01/99	H ₂ OGEOL	Fourth of Four Required Groundwater Monitoring Events (First Quarter, 1999).