

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

October 30, 2003

Ms. Barbara Cook, P.E.  
Department of Toxics Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710-2721

Dear Ms. Cook:

Subject: Alameda County Toxics Site No. RO0002538, Collins Property, 2235 Clement Ave.,  
Alameda, CA 94501

Alameda County Environmental Health staff has received your October 21, 2003, letter indicating DTSC's willingness to oversee the investigation and remediation of the referenced site, an adjacent parcel to 2201 Clement, the 5A Rent A Space property. This letter formally transfers this regulatory oversight to DTSC. All files and related documents for the subject site are enclosed.

If you have any questions please contact Barney Chan at 510-567-6765.

Sincerely,

Donna L. Drogos, P.E.  
Toxics Program Manager

C: D. Drogos, B. Chan  
Mr. Francis Collins, P.O. Box 8685, Emeryville, CA 94662-0685  
Ms. D. Tsuji and Mr. E. Gallera, DTSC

2235Clement transfer

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



10-10-03  
ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

October 9, 2003

Mr. Francis Collins  
P.O. Box 8685  
Emeryville, CA 94662-0685

Dear Mr. Collins:

Subject: Subsurface Case RO0002538, 2235 Clement Ave., Alameda, CA 94501

Alameda County Environmental Health staff has received numerous reports on the referenced site provided to us by Sequoia Environmental Corporation. The reports include Environmental Site Assessments, Subsurface Investigations, Remedial Action Completion Certificate, Biological Assessment and a Remedial Action Plan. We understand that residential properties are the proposed future use of this site. Upon review of these documents we have determined additional information is needed. We request that you address the following technical comments and submit the technical information below.

#### TECHNICAL COMMENTS

1. The additional addresses 2241 and 2247 Clement Ave. have also been mentioned as being part of the proposed development parcel, please clarify these other addresses and show their locations on a site map.
2. Numerous buildings A-I have been mentioned to exist (or previously existed) at this site. Please note their locations on a site map and list their historical and present use. Please also note the locations of all utilities, sumps, storm drains and subsurface structures in and outside the buildings.
3. Many soil and groundwater samples have been collected on and off site. Please provide a site map noting the locations and depths of all samples. Analytical results for all samples should be tabulated and compared against the appropriate Environmental Screening Levels (ESLs). Provide a discussion of the rationale for the number and location of the samples. Cross sectional diagrams should be provided minimally in the north-south and east-west directions. Please provide a summary of groundwater data from the four monitoring wells (B-14, B-19, B-20 and B-22) and any gradient maps.
4. As you are aware, there is concern that activities from the former J.H. Baxter wood treatment plant may be affecting your property. Please provide an interpretation of pertinent analytical results to explain whether this is an actual or perceived problem. If there is not enough data to make this decision, please propose additional investigation in your work plan.
5. Your work plan should specify the locations proposed for excavation and sampling. The work plan should characterize those areas of known chemical use, storage or disposal. In areas of unknown or no known chemical use random sampling at a standard frequency should be considered given the intended future use.
6. The Levine Fricke report dated 9/18/02 entitled *Project Summary Including Additional Investigation Activities and Analytical Results 2229 and 2241 Clement Ave., Alameda, CA* should be submitted to our office in entirety.

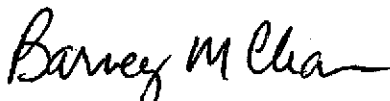
Mr. Francis Collins  
RO0002538  
2235 Clement Ave., Alameda, CA 94501  
October 9, 2003  
Page 2

TECHNICAL REPORT REQUEST

Please submit the requested reports, information and a modified work plan to our office by November 12, 2003. Our office will respond to the amended work plan once all the requested technical information has been submitted and reviewed.

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, D. Drogos  
Mr. Chris Wabuzoh, Sequoia Environmental, 900 Murmansk st., Suite 1B, Oakland,  
CA 94607

Techrq2235ClementAve

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



9-03-03

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

July 2, 2003

Mr. Francis Collins  
Proper Management  
1301- 61<sup>st</sup> St.  
Emeryville, CA 94608

Dear Mr. Collins:

2235

Subject: Deposit for Clement Ave. Project, ~~2229~~ 2229 Clement Ave., Alameda, CA 94501

Please submit a deposit of \$5000 payable to Alameda County, Environmental Health Services so we may provide regulatory oversight for the referenced project. It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, additional deposit will be requested, or any unused monies will be refunded to you or your designee.

The deposit/refund mechanism is authorized in Section 6.92.060 of the Alameda County Ordinance Code. Work on the project will be debited at the Ordinance specified rate, currently \$158 per hour.

Please write the following identifying information on your check or cover letter.

- Type of project (site mitigation-SLIC)
- Site address (2229 Clement Ave., Alameda)
- RO0002538

If you have any questions, please contact me at (510) 567-6765.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, D. Drogos

Mr. Chris Wabuzoh, Sequoia Environmental, 900 Murmask St., Suite 1B, Oakland, CA 94607

Dep2229ClementAve

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

R02538

May 12, 1998

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

ATTN: Sir Or Madam

Clement Avenue Project  
P O Box 8685  
Emeryville CA 94608

RE: Project # 441A - Type A  
at 2235 Clement Ave in Alameda 94501

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$645.50, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested or any unused monies will be refunded to you or your designee.

The deposit refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$94 per hour.

Please be sure to write the following identifying information on your check:

- project #
- type of project and
- site address

(see RE: line above).

If you have any questions, please contact Amir Gholami at (510) 567-6876.

Sincerely,

Tom Peacock, Manager  
Environmental Protection

c: files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#2538

RAFAT A. SHAHID, DIRECTOR

January 3, 1996

Mr. Francis Collins  
6050 Hollis Street  
Emeryville, CA - 95608

DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6777

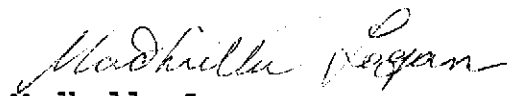
Ref: Clement Avenue Property -2235 Clement Ave, Alameda, CA

Dear Mr. Collins:

Please find attached a Notice of Reimbursement letter to reflect the change of address for the above referenced property, to 2241 Clement Avenue, Oakland, California, where the underground storage tanks are located. The Department's STID # has been changed from 1490 to 1325. This change has been made in response to the letter received from Chris Wabuza of Sequoia Environmental Consulting Services informing this Department of the 2 legal addresses for the referenced property. As mentioned in my previous letter, dated December 21, 1995, this Department will continue using 2235 clement avenue address for issues concerning the Poly Aromatic Hydrocarbon (PAH's) contamination.

If you have any questions, you can reach me at (510) 567-6764.

Sincerely,

  
Madhulla Logan  
Hazardous Material Specialist

CC: Lori Casias - State Water Resources Control Board,  
Sacramento, CA

off

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02538

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

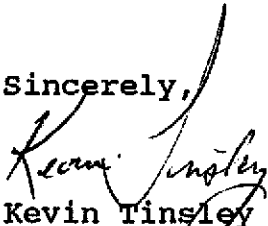
Mr. Collins  
January 23, 1993  
Page 5 of 5

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 Hiatt, San Francisco Bay-RWQCB
- Bruce LaBelle Ph.D, DTSC, PPTD
- Chris Nwabuzoh, Sequoia Environmental

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

R02538 (2235 Clement)

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.

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.

Mr. Francis D. Collins  
 September 24, 1991  
 Page 3 of 4

**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*

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



R02538

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

July 1, 1991

Mr. Roger Abendroth  
Reliance Sheet & Strip  
2301 10th Street  
Antioch, CA 94509

Subject: Quarantine at 2235 Clement Ave., Alameda

Dear Mr. Abendroth:

We have received your laboratory results of June 27, 1991 concerning the material found at the above address. Based on those results, it appears that the material sampled is not asbestos and the quarantine is hereby lifted.

If you have any questions on this matter, please contact me.

Sincerely,

Lowell J. Miller  
Senior Hazardous Materials Specialist



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R02538

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 TSDR 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

Page 2 of 2  
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.

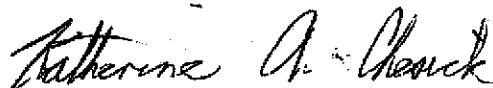
All proposals, reports and analytical results pertaining to this investigation must be sent to our office and to:

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

*z/s*

## 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

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).

Note: water level and free product thickness measurements shall be made in all wells before sampling is begun. Measurement of free product must be done by optical probe or other method having equal accuracy.

Ground water samples are to be analyzed by a California State Certified Laboratory for the appropriate constituents (see Attachment 1, Table 2, 10 August 1990 SFRWQCB document).

IV. Prepare a Site Safety Plan

V. Reporting - The work plan must describe how the investigation results will be presented and interpreted. At a minimum, the following investigation information and interpretations must be submitted:

- \* site history information;
- \* boring and well construction logs;
- \* records of field observations and data;
- \* chain-of-custody records;
- \* water level data;
- \* water level contour map showing ground water gradient direction;
- \* contaminant plume maps;
- \* tabulations of soil and ground water contaminant concentrations;
- \* tabulations of free product measurements;
- \* figures showing depths and locations of all soil and ground water samples;
- \* status of soil contamination characterization;
- \* description of any remedial work performed;
- \* laboratory-originated and signed analytical results for all soil and ground water samples collected;
- \* copies of TSDF to Generator manifests for any hazardous wastes hauled off site; and
- \* recommendations for additional investigative or remedial work.

4/5/21

Send a copy of the letter to:

Chris Nwabuzoh  
RGA  
1260 45<sup>th</sup> Street  
Emeryville, CA 94608  
547-7771

Chris wants me to include in letter what happens if client doesn't comply