

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



11-17-00

RO437 (1138A; 0)

PO2842 (9)

November 16, 2000
StID # 1138

Mr. Richard Croop
Glascock Street Properties
C/o E. B. Field Company
436 14th St., #805
Oakland CA 94612-1394

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

Re: Water Board Meeting for 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Croop:

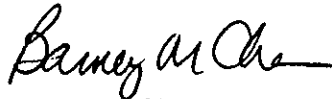
This letter serves to summarize my understanding of the status and future requirements for the above referenced site as discussed in our November 14, 2000 meeting at the Regional Water Quality Control Board (Water Board). The following items were discussed:

- One year of quarterly groundwater monitoring was suggested. The addition of oxygen releasing compound (ORC) in the form of socks in wells and as a slurry injection is believed to require this additional treatment time. To monitor the residual amount of ORC in the socks, the dissolved oxygen reading prior to purging will be used to determine when the socks should be replaced.
- After the year of monitoring, the ORC socks will be removed and an additional year of quarterly monitoring will be done to verify stable or decreasing conditions.
- Tentative cleanup levels were discussed. The Tier 1 diesel concentration of 640 ppb in groundwater from the San Francisco Airport order was proposed. Although this is the primary chemical of concern, please be aware that gasoline, BTEX (benzene, toluene, ethyl benzene and xylenes) and motor oil have also been reported in groundwater and should also be evaluated to the Airport numbers. MTBE, which has been found, is likely from an off-site source.
- Dissolved oxygen readings will be taken before and after purging and sampling to demonstrate that the groundwater samples are representative of actual groundwater conditions.
- Bio-parameters are to be tested in forthcoming monitoring events. In addition to dissolved oxygen, please run the following parameters; oxidation-reduction potential, nitrates, sulfates and ferrous iron. Naturally, an evaluation of these bio-indicator results should be included in your monitoring reports.
- There will be an attempt to research several statistical trend analysis methods including linear regression and Mann Kendall analyses. The recommended method, based on the research, should be used to determine trend. If a stable or decreasing trend of concentrations less than the clean-up requirement is not shown, active remediation will be required.

Mr. R. Croop
2901 Glascock Ave., Oakland 94601
StID # 1138
November 16, 2000
Page 2

Please contact me at (510) 567-6765 if you have any comments or questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. Lehane, IT Corporation, 1921 Ringwood Ave., San Jose, CA 95131-1721

Mr. C. Headlee, RWQCB

Mr. J. Weber, ICONCO, 303 Derby Ave., Oakland CA 94601

Stat2901Glascock

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



10-26-00

RO 2842
RO# 437

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

October 26, 2000
StID # 1138

Mr. Richard Croop
E. B. Field Company
436 14th St., Room 805
Oakland CA 94612-1394

Re: Status of Environmental Investigation at 2901 Glascock Ave., Oakland 94601

Dear Mr. Croop:

This letter is meant to inform you of the County's response to recent letters from your consultant, the IT Group. On several occasions, most recently in their October 6, 2000 letter, the IT Group has summarized the past activities at this site and recommended "monitored natural attenuation" (MNA) as the appropriate remedial action for this site.

The County has discussed this site with Mr. Chuck Headlee of the Regional Water Quality Control Board (RWQCB) and at this time, we are not convinced that this is the most appropriate remedial approach for this site. As you may be aware, MNA is an acceptable EPA recommended approach, however, its use is recommended only when specific site conditions have been met. One requirement is that the burden of proof for justifying this approach is on the proposer of this remedial action. Therefore, our offices have notified your consultant that we would like to meet with him to discuss the merits of MNA. This meeting should be scheduled during the second week of November, if possible. Please contact your consultant to schedule a time and date acceptable to all attendees.

Some items, which should be provided or demonstrated at the meeting, are the following:

- Demonstration of declining contaminant concentrations
- Demonstration of source removal, estimation of residual soil and groundwater contamination at site
- Demonstration that remedial objectives will be reached within a reasonable time frame
- Verification that clean-up levels have been met and are protective of human health and the environment
- Demonstrate that MNA is occurring and provide a measure of its effectiveness
- Contingency plan and indicator of unacceptable performance of MNA

For further information you may contact the Center for Public Environmental Oversight at (415) 904-7751 or the EPA website @ <http://www.epa.gov/swerust1/directiv/index.htm>.

Mr. Richard Croop
October 26, 2000
SID # 1138
2901 Glascock Ave., Oakland
Page 2

Please contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. Lehane, IT Corporation, 1921 Ringwood Ave., San Jose, CA 95131-1721

Mr. C. Headlee, RWQCB

MNA2901Glascock

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02842
R0#437

~~August 25, 2000~~

StID # 1138

Mr. Richard Croop
E. B. Field Company
436 14th St., Room 805
Oakland CA 94612-1394

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

Re: 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Croop:

Our office has received and reviewed the July 12, 2000 correspondence from the IT Group regarding their opinion on the above site. IT proposes that current action at this site be limited to groundwater monitoring only. I have discussed this site with Mr. Chuck Headlee of the San Francisco Regional Water Quality Control Board (SFRWQCB) and our offices do not concur with your consultant's proposal. Because this site is located directly adjacent to the Oakland-Alameda estuary, groundwater contamination from this site is impacting this surface water. A fairly good estimation of the concentration of this petroleum is that which has been reported in monitoring well MW-6, which lies only a few feet from the estuary.

It is also apparent from both soil and groundwater analysis that the areas of the former underground tanks have considerable residual diesel contamination. These areas continue to be a source of diesel fuel that will eventually migrate to the estuary. Because of this, you are requested to propose some type of active remediation to prevent continual discharge to the estuary. Our office recommends that you consider several options, which may include any one or a combination of the following or others:

- Addition of oxygen releasing compound to a larger area.
- Addition of chemical oxidation compounds.
- Limited hot spot excavation
- Interception trench or barrier.

Our office also recommends that you contact and apply to the State Water Resources Control Board Underground Storage Tank Cleanup Fund (Cleanup Fund) for potential reimbursement of your remediation expenses. You may obtain an application by calling (916) 227-4307 or through the help of your consultant. **Please continue your quarterly monitoring and provide a remediation work plan within 45 days or no later than October 10, 2000.** You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. E. Garner, IT Corporation, 1921 Ringwood Ave., San Jose, CA 95131
Mr. C. Headlee, RWQCB

remed2901Glascock

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



JEN 6/5/2000
incl cd's

RO 2842
RO 437

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

June 2, 2000
StID # 1138

Mr. Richard Croop
E. B. Field Company
436 14th St., Room 805
Oakland CA 94612-1394

RO 437
↳ (O) 1138A
&

Re: 2901 Glascock Ave., Oakland CA 94601

RO 2842 (9)

Dear Mr. Croop:

I have received and reviewed the May 11, 2000 Quarterly Report for the first quarter year 2000 for the above site as prepared by the IT Group. This monitoring event occurred on March 3, 2000, before our April 19th meeting at the County offices.

As you may recall from this meeting, the soil and groundwater diesel concentrations were in excess of that recommended by the Water Board's order #99-045 ie 518 ppm in soil and 640 ppm in groundwater. The results of the March 3rd monitoring continue to show elevated diesel in wells, including well MW-6, which is only a few feet from the Oakland-Alameda estuary. It is likely that the residual soil contamination from the releases from the former fuel tanks continues to act as a source of the diesel found in groundwater. The monitoring well data sheets indicate sheen on the water in several of the wells in addition to petroleum odors.

The options mentioned in my April 19th letter were to add oxygen releasing compounds or chemical oxidants such as hydrogen peroxide. Obviously, soil excavation, though effective, was not considered a "reasonable" alternative. The May 11th monitoring report recommended the replacement of oxygen-releasing socks into wells MW1, 2 and 6. Though this may be helpful, it would not treat the majority of the petroleum release. The socks have a limited affect in the groundwater in a limited radius around the well in which it is added. This would have only a gradual effect on treating the contamination. Please consider a larger area and amount of chemical treatment for this site. I would remind you that the initial amount of oxygen releasing compound added was calculated to prevent the migration of a petroleum plume **not** to treat the entire mass of the plume.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. E. Garner, IT Corporation, 1921 Ringwood Ave., San Jose CA 95131
2-2901Glascock

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02842

ENVIRONMENTAL HEALTH SERVICES

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

September 14, 1999
StID # 1138

Mr. Dennis Buran
Glascock St. Properties
383 Diablo Road, Suite 100
Danville, CA 94526

Re: Quarterly Report for 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Buran:

As mentioned in the Second Quarter 1999 monitoring report for the above site, in August this year, your consultant performed the injection of oxygen-releasing compound (ORC) into a number of borings at this site. It is anticipated that this will enhance natural bio-remediation at the site by increasing the dissolved oxygen concentration in groundwater. Therefore, please be sure to take dissolved oxygen readings in all well in your future monitoring events. If ORC socks are still in any of the wells, please remove from the well and purge the well before sampling for dissolved oxygen. You should also measure the oxidation-reduction potential reading in the same samples.

Please call me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. A. Lehane, IT Group, 1921 Ringwood Ave., San Jose, CA 95131-1721
D0mon2901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#437
✓ RO#2842

October 10, 1997
StID # 1138

Mr. Dennis Buran
GlascocK Street Properties
425 Market St.
Oakland CA 94607

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

Re: Quarterly Report-Second Quarter 1997, 2901 GlascocK St.,
Oakland CA 94601

Dear Mr. Buran:

Our office has received and reviewed the August 19, 1997 Pacific Environmental Group (PEG) quarterly groundwater monitoring report for the above referenced site. I have also spoken with Mr. Andrew Lehane of PEG. He requested that I comment on the recommendations made in this report. Recall, PEG has used a number of sources and come up with a proposed cleanup standard of 6.5 ppm (mg/l) Total Petroleum Hydrocarbons as diesel (TPHD) for this site. Based upon the monitoring results, PEG recommended that no modification of the remediation plan be performed. That is, remediation would consist solely of the addition of Oxygen Releasing Compound (ORC) in wells MW-1, MW-2 and MW-6.

I spoke with Mr. John Kaiser of the SFRWQCB about this site. It was his opinion that current conditions at this site **were not acceptable**. Through our discussion the following observations were made:

* the immediate proximity of the Oakland-Alameda estuary to this site indicates that the petroleum release from this site is within the mixing zone of the estuary water and is therefore directly discharging into the surface water.

* as mentioned in the PEG report, the RWQCB does not consider dilution when setting discharge limits from the source, therefore, dilution factors cannot be considered.

* the referenced 10 mg/l water protection standard for oil and grease in the Basin Plan cannot be used TPHd. It is known that the ecotoxicity of TPHg, TPHd, TPHmo vary.

* though the RWQCB may be considering modifying the groundwater cleanup standards for the SF Airport, it has not been shown that the conditions and assumptions made for the Airport, which would allow this modification, also exist at this site.

Mr. Dennis Buran
StID # 1138
2901 Glascock Ave.
October 10, 1997
Page 2.

* the measured oxygen concentration in those wells where ORC was added is 3-4 ppm, considerably lower than saturated conditions. It appears that site could benefit by the addition of more ORC compound since the areal extent of the current ORC compound is not treating the entire extent of groundwater contamination.

* besides TPHd, these analytes have been detected in MW-6, the most downgradient well; TPHg, benzene, MTBE, TPH as motor oil and chlorinated solvents. Are there cleanup levels necessary for any of these parameters?

* the "conservative" cleanup level of 3 mg/l TPHd from the Aquatic Toxicity of Petroleum Product (ATPP) and the proposed cleanup level of 6.5 mg/l has been exceeded regularly in MW-6.

Because of the above, our office requests that a further modification of your remedial plan be instituted. Please provide an appropriate work plan to our office **within 30 days or by November 12, 1997.**

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files

Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose
CA, 95110

Mr. J. Kaiser, RWQCB

modwp2901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02842

August 14, 1989

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program (5)
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

Lisa A. Polos
Toxic Technology Services
P. O. Box 515
Rodeo, CA 94572

Dear Ms. Polos:

As requested on your letter of August 3, 1989 pertaining to File Nos. 89-6 and 89-8, we have reviewed our files on Hazardous Waste Generator, Underground Tanks (UGTs), Proposition 65 and site mitigation.

The following information is presented per your request:

OAKLAND

320 - 29th Ave.

No record

324 - 23rd Ave.

No record

(R0395) 421 - 23rd Ave.

Bay Area Petroleum Co.

Inspected 8/26/88
Interim permits issued
for 5 UGTs on 5/22/89
No record of soil
contamination
No major violations
of the state law

(R0437) 2901 Glascock

ABI Machine Shop

Inspected 7/11/86
No record of soil
contamination
No major violations
of the state law

(R02842)

(11) 2901 Glascock

Windward Yachts

Inspected 7/11/86
No record of soil
contamination
No major violations
of the state law

HAYWARD

(R047) 19984 Meekland Rd. Durham Transportation	Inspected 3/3/88 Interim permits issued for 4 UGTs on 4/20/89 Closure plans submitted to remove 4 tanks on 7/28/89 No major violations of the state law
128 Blossom Way	No record
50 Blossom Way	No record
(R0720) 20009 Meekland Rd. Hoang's Auto Care	Inspected 3/3/88 No record of soil contamination No major violations of the state law
20008 Meekland Rd.	No record
20332 Meekland Rd.	No record
20228 Meekland Rd.	No record

This letter is limited to information available to this department and does not reflect any other information which may be accessible from other agencies or parties.

You will be billed for the provision of this service. Please find enclosed a copy of the invoice sent to our Billing Unit.

If you have any questions concerning this matter, please contact Edgar Howell, Supervising Hazardous Materials Specialist at 271-4320.

Sincerely,



for Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:MAM

Enclosure