January 13, 1992

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Ms. Eileen Hughes
California Environmental Protection Agency
Department of Toxic Substance Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710

Subject: 1696 Martinez Street
San Leandro, California

Dear Ms. Hughes:

This correspondence has been prepared in response to the December 27, 1991 Alameda County Health Care Services Agency (ACHCSA) letter to Mr. Carl Graffenstatte. Aqua Terra Technologies, Inc (ATT) has been retained by Mr. Graffenstatte to address the issues raised in the December 27 letter.

Aqua Terra Technologies
Consulting Engineers
& Scientists

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The ACHCSA letter indicates that the California Environmental Protection Agency (Cal-EPA) is currently involved in conducting a Regional Hydrology and Contamination Study in Central San Leandro. The stated purposes of this study are: 1) "defining as far as possible the known vertical and horizontal extent of contamination in the area; 2) identifying existing public and/or private wells that can be used by the Department of Toxic Substance Control (DTSC) for monitoring purposes; 3) instituting coordinated sampling; and 4) defining hydrogeology of the area."

The ACHCSA requests Mr. Graffenstatte to collect a groundwater sample from "at least" one well. The sample is to be analyzed for volatile organic compounds (VOC) in accordance EPA Method 624 or EPA Method 601/602. The results of the groundwater sample collection and analytical activities is requested to be submitted to the DTSC within the first quarter of 1992.

ATT submitted a request to the California Department of Health Services (DHS) on February 14, 1990 to review the file for the subject property. A review of the DHS file for this site was conducted by ATT on March 6, 1990. The results of this review were presented in the ATT report dated April 2, 1990 (Attachment A). As is discussed in the ATT report, this site has been inspected by the EPA and DHS several times in the past. The DHS collected soil samples from and adjacent to this site in 1983 and 1989 for laboratory analysis. Analyses requested by the DHS for the soil samples have included extractable organics (reported as semi-volatile organic compounds), organochlorine pesticides, polychlorinated biphenyls, and metals. A concern as to the potential of the presence of VOCs at this site was not raised, documented, or otherwise expressed in the DHS file. Correspondingly, ATT is not aware of any evidence to suggest that VOCs are a concern at this site. It is therefore unclear why the request for VOC analysis of groundwater has been directed to Mr. Graffenstatte. However, if the DTSC has information

contrary to this understanding, ATT requests copies be forwarded to Mr. Graffenstatte without delay.

To the best of our knowledge, ATT is not aware of the existence of any present or historical groundwater monitoring wells, or groundwater analytical data for the subject property. However, in the spirit of ongoing cooperation with all regulatory agencies interested in this site, Mr. Graffenstatte has graciously consented to allow access to his property should the DTSC itself wish to install a groundwater monitoring well. Mr. Graffenstatte respectfully requests the DTSC prepare a workplan for these activities, and submit this workplan to Mr. Graffenstatte for review and comment prior to commencing with any drilling, sampling, or monitoring activities at this site.

Please feel free to contact me if ATT can be of any service to the DTSC regarding matters discussed herein.

Very truly yours,

AQUA TERRA TECHNOLOGIES, INC.

Ronald M. Block, Ph.D.
President

RMB/:pd

Attachment

cc: Mr. Carl Graffenstatte
Mr. Craig Ellis, Esq.
Mr. Scott Seery, ACHCSA
Mr. Edgar B. Howell, III, ACHCSA
Mr. Rafat A. Shahid, ACHCSA
Mr. Gil Jensen, Alameda County District Attorney
Mr. Lester Feldman, San Francisco Bay Region of the California Regional Water Quality Control Board
Mr. Mike Bakaldin, San Leandro Fire Department
Mr. Jim Ferdinand, Eden Consolidated Fire District

ATTACHMENT A

ATT Report - April 2, 1990

Aqua Terra Technologies
Consulting Engineers
& Scientists

2950 Buskirk Avenue
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April 2, 1990

Ms. Charlene Williams, Chief
Surveillance and Enforcement
Department of Health Services
700 Heinz Avenue, Building F
Berkeley, CA 94710

Subject: 1696 Martinez Street
San Leandro, CA

Dear Ms. Williams:

This letter provides the results of an evaluation of the California Department of Health Services (DHS) file for the subject property conducted by Aqua Terra Technologies, Inc. (ATT). The file evaluation was conducted at the request of the current property owner, our client, Mr. Carl Graffenstatte.

ATT requested access to information regarding the subject property in a letter dated February 14, 1990. This request was made under provisions granted within the California Public Records Act (California Government Code section 6250 et.seq.). A copy of the request letter is provided as Attachment A. Included herein is a discussion of the site history, results of DHS soil sampling activities, and conclusions.

SITE HISTORY

1930 - 1984

Historical records indicate that the subject property was utilized as a petroleum bulking and transfer station between 1930 and 1984. Various companies including Sunland Refinery Company, Grafco Oil Company, Fabian Oil Company, and Lakewood Oil Company have occupied the site since 1930. Activities at the site have included temporary storage of petroleum products in above ground tanks for the purpose of distribution, and storage of waste oil prior to off site transport for recycling. Above ground storage tanks were exclusively used at the site.

Fabian Oil Company, doing business as Liquid Gold, filed a Part A permit application on December 10, 1980. The DHS file indicates that Liquid Gold was never granted Interim Status by the DHS. No record of a Part B permit application was observed in the DHS file.

1984 - Present

A site inspection was conducted by Ecology and Environment, Inc. (EE) under contract to the EPA in January 1985. The January 1985 report includes laboratory data for soil samples collected at the site by the DHS in 1983. The analytical results indicate that hydrocarbons were "detected" in five of nine soil samples, however, this data is inconclusive since the laboratory failed to provide the actual concentration levels detected in the samples. In addition to hydrocarbon analysis, metals and PCB analysis was also conducted. Since the DHS collected soil samples in 1989 for analysis of metals and PCBs, the 1983 data for these compounds would not appear to be representative for the purposes of defining current site characteristics.

The conclusions of the January 1985 EE report indicated that a small amount of oil stained soil had been observed in the vicinity of the storage tanks. The report further stated that contaminant migration to shallow aquifers did not appear to be a concern. Based on the findings of the Field Investigation Team (FIT), the 1985 report concluded that no further action was justified at the site.

According to Inspector Robert Lundstrom of the San Leandro Fire Department (SLFD), removal of the above ground storage tanks occurred between 1984 and 1986. Inspector Lundstrom stated that the SLFD had revoked the grandfather privilege for above ground storage of petroleum materials at the site following a period of non-use for the tanks exceeding one year. It is unclear when tank removal activities were initiated, however, the tank removal activities were completed in 1986. In addition to the removal of the storage tanks, all structures on the site, including buildings and concrete foundations, were removed by 1986. The areas in the vicinity of the former storage tanks were excavated in order to remove concrete foundations. The excavated areas were then backfilled with an imported fill material.

ATT conducted a site visit on February 1, 1990. The site is presently vacant and no structures are present. No stained soil was observed by ATT in the areas where the storage tanks had been located. The site cover is presently characterized by weeds, scattered patches of asphalt, and minor amounts of litter and debris.

SOIL SAMPLING ACTIVITIES

In addition to the soil samples collected by the DHS in 1983, soil samples were collected at the site by Mr. James Scott Bullock of the DHS on April 21, 1989. A total of 12 soil samples were collected during the April 1989 sampling event. Of the 12 samples collected, two samples appear to have been collected from property owned by the railroad. According to Mr. Bullock's account of the sample collection event, samples LGSB005 (E 1727) and LGSB008 (E 1730) were collected at approximately 20 feet and 15 feet, respectively, from the railroad tracks. A survey dated January 30, 1945 indicates that the subject property line lies 30 feet from the railroad tracks. This survey indicates that samples E 1727 and E 1730 were collected from outside the boundaries of the subject property, and should be considered background samples for the purpose of evaluation of on site chemical concentations.

All 12 soil samples were analyzed for semi-volatile organics, organochlorine pesticides and PCB's, and priority pollutant metals. A discussion of the results for each of these analyses is provided below.

Semi-Volatile Organics

None of the 12 soil samples collected was found to contain any semi-volatile organic compounds. These types of organic compounds are commonly present in petroleum oils and contribute to total petroleum hydrocarbons (TPH). The absence of these compounds in the samples collected by DHS is evidence that oil contamination is not present in site soils.

Organochlorine Pesticides and PCB's

Of the 12 soil samples analyzed, nine samples were found to contain PCB-1260 (Table 1, Attachment B). Sample E 1730, collected from adjacent railroad property, contained the highest level of PCB-1260 with a reported laboratory result of 1.3 mg/Kg. The average level of PCB-1260 reported for the samples collected on site was approximately 0.34 mg/Kg. The analytical laboratory reported values ranging from non detect (in three samples) to 0.78 mg/Kg in sample number E 1732. In

addition to PCB-1260, one sample (number E 1729) was reported to contain DDT at a level of 0.13 mg/Kg. No other organochlorine pesticides and/or PCB's were detected in any of the 12 samples analyzed.

Cleanup levels for PCB's in soil were recently established by the EPA at the MGM Brakes site in Cloverdale, California, at 10 mg/Kg. The levels of PCB's in site soils at the subject property are at least 14 times less than the soil clean up levels at the Cloverdale site. The trace amounts of PCB-1260 in site soils does not justify either further evaluation of the site or implementation of any clean up activities.

Metals

The 12 soil samples were also analyzed for metals (Table 1, Attachment B). The sample collection report signed by Mr. Bullock indicates that samples were not collected for the purpose of establishing background levels. A review of the laboratory results does not reveal hazardous concentrations of any metal (California Code of Regulations, Title 22 Section 66699).

The DHS file does, however, document a concern regarding the levels of lead compounds in site soils. The reported levels of lead in site soils were found to be within naturally occurring levels of lead in soil. According to Lead in the Environment, Geological Survey Professional Paper 957, US Government Printing Office, 1976, levels of lead were encountered in natural soils ranging up to 700 mg/Kg. It is the opinion of ATT that the concentration of lead in the site soils are representative of background levels. However, a definitive evaluation is not possible without a proper characterization of background conditions. Nevertheless, if samples E 1727 and E 1730 are considered background, lead concentrations in on site soils are consistent with background levels and cannot be interpreted as contamination.

Furthermore, the site is located in an industrial area and is bounded on two of its three sides by public roads, and on the third by railroad tracks. It is widely accepted that exhaust from internal combustion engines burning fuels containing lead will deposit lead compounds to nearby soils. Several studies have been conducted to

evaluate the concentration of lead in soil along roadways and highways. Results of these studies have indicated lead concentrations of several thousand mg/Kg are not uncommon in exposed soils within industrial areas and adjacent to public roads.

CONCLUSIONS

The historical evidence does not support the perceived agency concern regarding possible soil contamination at the site. Historical observations of stained soil in the vicinity of storage tanks is of questionable value for the purpose of establishing the present environmental quality of the site. Analytical data from the most recent soil samples collected by the DHS indicate that the site soils are free of the organic compounds associated with petroleum hydrocarbons. The stained soils are not currently observable and were apparently excavated and removed during demolition activities at the site. The concentrations of PCB's in site soils do not justify remedial measures based on established clean up levels at other sites. The concentrations of lead in site soils appears to be representative of background and does not justify a remedial response.

The data and discussion provided herein support the conclusion that the site does not pose a threat to human health or the local environment. Furthermore, the laboratory analytical data generated to date indicate that the environmental quality of the site has been established and that no further characterization activities are warranted.

On the basis of the information discussed in this letter and on the understanding that DHS has provided access to the complete file, as requested, ATT requests that the DHS and Alameda County Health Care Agency which we understand has been involved with the DHS in reviewing the subject property, remove the site from active status and provide written confirmation of this to the property owner without delay.

Please feel free to contact us regarding any of the matters discussed herein.

Sincerely,

Aqua Terra Technologies, Inc.

Bradley J. Bennett
Project Manager

R. Wane Schneiter, Ph.D.
Civil Engineer No. 38735 (Expires 3/31/93)
Principal Environmental Engineer

cc: Mr. Bill Faulhaber
Alameda County Health Care Services Agency
80 Swan Way, Room 200
Oakland, CA 94621

Mr. Carl Graffenstatte
P. O. Box 97397
Tacoma, WA 98497

Craig Ellis Esq.
3382 Warm Springs Road
Glen Ellen, CA 95442

Mr. Bill McCammon
Deputy Fire Chief
835 East 14th Street
San Leandro, CA 94577

RWS/BJB:mp
Attachments

9123/cw032290.ltr

ATTACHMENT A
File Access Request

February 14, 1990

Ms. Doris Cruz
Department of Health Services
700 Heinz Street, 2nd Floor
Berkeley, CA 94710

Subject: File Review Request
1696 Martinez Street
San Leandro, CA
(Project No. 9123)

Dear Ms. Cruz:

Aqua Terra Technologies, Inc. (ATT) is currently conducting an evaluation of the property located at 1696 Martinez Street, San Leandro, CA. In a recent telephone conversation with Mr. Dan Cox of your office, Mr. Cox indicated that a Department of Health Services file exists on this property. ATT respectively requests the opportunity to review any and all information contained in this file.

ATT would greatly appreciate any assistance you may provide in expediting this request.

Sincerely,

Aqua Terra Technologies, Inc.

Bradley J. Bennett
Project Manager

BJB:pd

Aqua Terra Technologies
Consulting Engineers
& Scientists

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ATTACHMENT B
Table 1

Table 1. Analytical Results Summary - Pesticides, PCB's, and Metals[a]
1696 Martinez Street
San Leandro, CA

	Sample I.D. (HML Number)											
	E1723	E1724	E1725	E1726	E1727	E1728	E1729	E1730	E1731	E1732	E1733	E1734
PCB 1260	0.130	0.080	ND[b]	0.180	0.110	ND	ND	1.30	0.470	0.780	0.210	0.560
4-4DDt	ND	ND	ND	ND	ND	ND	0.130	ND	ND	ND	ND	ND
Silver (AG)	<0.35	<0.35	<0.35	<0.35	<0.35	<0.35	<0.35	<0.35	<0.35	<0.35	<0.35	<0.35
Arsenic (As)	<7.3	<7.3	<7.3	<7.3	<7.3	<7.3	<7.3	<7.3	<7.3	<7.3	<7.3	<7.3
Barium (Ba)	175	214	93.2	272	178	174	343	212	193	207	184	181
Beryllium (Be)	0.36	0.20	0.25	0.31	0.32	0.33	0.47	0.29	0.17	0.22	0.23	0.27
Cadmium (Cd)	1.94	1.37	1.48	4.31	1.42	1.45	3.10	2.26	1.88	2.11	2.53	1.86
Cobalt (Co)	8.93	7.46	7.11	10.5	9.33	9.47	12.1	10.1	7.31	9.94	8.95	7.81
Chromium (Cr)	38.7	37.3	40.0	94.2	47.9	52.8	64.6	49.4	39.5	52.4	58.2	52.6
Copper (Cu)	47.3	26.9	19.3	62.7	37.0	26.4	55.4	79.9	42.8	127	49.5	57.1
Molybdenom (Mo)	<3.6	<3.6	<3.6	<3.6	<3.6	<3.6	<3.6	5.37	<3.6	11.7	<3.6	<3.6
Nickel (Ni)	40.0	30.6	24.2	47.5	44.4	45.1	55.1	40.8	35.5	40.2	46.9	42.5
Lead (Pb)	128	71.2	30.2	418	40.6	33.7	475	245	214	243	221	181
Antimony (Sb)	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7	<5.7
Selenium (Se)	<7.9	<7.9	<7.9	<7.9	<7.9	<7.9	<7.9	<7.9	<7.9	<7.9	<7.9	<7.9
Vanadium (V)	34.2	26.2	28.5	32.0	28.7	37.9	36.6	29.6	22.8	32.0	29.0	27.1
Zinc (Zn)	239	244	113	332	156	138	1020	371	258	414	270	214

a. Results reported in mg/Kg
b. ND = Not Detected