

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R01603

✓ R02891

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  
(510) 271-4530

March 15, 1994  
STID 1103

Rose Pelino  
Avis Rent A Car  
1 Neil Armstrong Way  
Oakland, CA 94614

Re: 1 Neil Armstrong Way, Oakland, CA 94621

Dear Rose Pelino:

This office has received and reviewed the last three Ground Water Monitoring Reports ending with one dated February 16, 1994 by McCulley, Frick & Gilman, Inc. concerning the above site. The report is acceptable to this office with the following comments:

1. The Summary and Conclusions on page 6 are appropriate, as regards potential site closure.
2. The cover letter from Pillsbury, Madison & Sutro dated February 18, 1994 requests site closure, based on the contents of the reports. This office agrees with this conclusion and will begin processing the case closure summary as soon as possible. We may contact you if there are any gaps in the data. Normally, case closure takes about 50 days, if acceptable to all parties.

If you have any questions please call this office.

Sincerely,

Thomas F. Peacock, Supervising HMS  
Hazardous Material Division

cc: Edgar Howell, Chief - Files  
Beth Hamilton, Pillsbury Madison, & Sutro, Ten Almaden  
Blvd., San Jose, CA 95113  
Michelle Heffes, Port of Oakland, 530 Water St., Oakland,  
CA 94604  
Ed Conti, McCulley, Frick & Gilman, Inc., 5 Third St.,  
Suite 400, San Francisco, CA 94103



December 28, 1993

CERTIFIED MAILER #: P 422 218 188

Avis Rent A Car  
1 Neil Armstrong Way/airport  
Oakland, 94621  
UGTID:1103

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(510) 271-4320

**Re: FIVE-YEAR PERMITS FOR OPERATION OF UNDERGROUND STORAGE TANK(S)  
1 Neil Armstrong Way/airport Oakland, 94621**

Dear Owner/Operator:

According to our records your facility referenced above has not received a five-year permit to operate UST's. In order to obtain a permit you must complete the following items marked below and return them within 30 DAYS. The necessary forms are enclosed. You may complete a "Consolidated Underground Tank Management Plan" which will assist you in preparing a monitoring plan, site plot plan and spill response plan for your tank(s). If supplemental information or forms are required, please submit it to this office with the completed questionnaire and application forms:

- \_\_\_ 1. An accurate and complete plot plan.
- \_\_\_ 2. A written spill response plan. (enclosed)
- \_\_\_ 3. A written tank monitoring plan. (enclosed)
- \_\_\_ 4. Results of precision tank test(s), (initial and annual).
- \_\_\_ 5. Results of precision pipeline leak detector tests (initial and annual).
- \_\_\_ 6. Complete UST PERMIT FORM A-one per facility. (enclosed)
- \_\_\_ 7. Complete UST PERMIT FORM B-one per tank. (enclosed)
- \_\_\_ 8. Complete UST PERMIT FORM C-one per tank if information is available. (enclosed)
- \_\_\_ 9. Letter stating how the tank is to be maintained during one year closure.

Be advised that Title 23 of the California Code of Regulation prohibits the operation of "ANY" UST without a permit. If our records are in error, you must contact this office immediately TO AVOID POSSIBLE ENFORCEMENT ACTION. Please feel free to contact this office at (510) 271-4320; to answer any questions which may arise in completing the mandatory five-year permit process. Be prepared to provide your zip code to speak with the Hazmat Specialist handling your case.

Sincerely,

PAUL SMITH  
HazMat Specialist

c: Edgar Howell, Chief, Hazardous Materials Div. (files)

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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RAFAT A. SHAHID, Assistant Agency Director

July 22, 1992  
STID # 1103

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(510) 271-4320

Ms. Beth L. Hamilton  
Pillsbury, Madison & Sutro  
Ten Almaden Boulevard  
San Jose, CA 95113

Re: Status of Remediation at Avis Rent A Car, Inc., 1 Neil  
Armstrong Way, Oakland CA 94621

Dear Ms. Hamilton:

Our office has reviewed the May 26, 1992 Quarterly Monitoring Report on the above referenced site as prepared by McCulley, Frick and Gilman, Inc. We have also received your request for recommendation for site closure based on these results. Unfortunately, our office cannot concur this request since detectable concentrations of benzene was found in the November 25, 1991 and the January 3, 1992 monitoring events in the amounts of 1.8 and 2.4 parts per billion, ppb, respectively. Note that these concentrations exceed the current DHS primary MCL, maximum contaminant level, of 1 ppb. As you are aware, prior to County recommendation for site closure to the Regional Water Quality Control Board (RWQCB), one year, ie four consecutive quarters of non-detectable parameters must be shown to exist.

To aid you in expediting site closure when the above conditions exist, enclosed please find their recommended format for a closure report.

Please contact me at (510) 271-4320 should you have any questions regarding this letter.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

enclosure (Ms. Hamilton and Mr. Conti only)

cc: M. Thomson, Alameda County District Attorney Office  
Mr. Karl Westerman, Avis  
R. Hiett, RWQCB  
M. Heffes, Port of Oakland  
E. Conti, McCulley, Firk and Gilman

ALAMEDA COUNTY  
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DAVID J. KEARS, Agency Director



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

October 31, 1990

Ms. Beth Hamilton  
Pillsbury, Madison & Sutro  
Ten Almaden Boulevard  
San Jose, CA 95113

Dear Ms. Hamilton:

I have reviewed the "Soil and Groundwater Investigation Report" prepared by McCulley, Frick, & Gilman, Inc. (MF&G) dated September 19, 1990, for Avis Rent A Car at 1 Neil Armstrong Way in Oakland. This report describes the investigation that has occurred at the site and describes activities that will be performed based on information provided from the investigation.

Section 8.0 of the report describes the remedial program for the site. This consists of excavating hydrocarbon contaminated soil in the vicinity of Monitoring Well 1 (MW1), and replacing MW1. Of the three wells installed, only soil samples and water samples from MW1 contained hydrocarbons.

I contacted Mr. Ed Conti of MF&G to discuss the placement of the new monitoring well. This well should be placed on the down-gradient side of the final excavation. Once it has been shown that groundwater has been impacted, the next step is to define the extent of the plume. At this point in the Avis investigation, there is no information on where the plume has migrated. According to Mr. Conti, the latest sampling round shows that hydrocarbon levels have decreased considerably; however, only by further groundwater investigation can it be determined if this is indeed a "real" decrease in values, or if we are just seeing the plume migrate past this monitoring point.

In a separate issue, I reviewed the files regarding the removal and installation activities at the Avis facility. We still need a copy of the as-built drawings of the new installation, as requested by Ariu Levi. This was a condition of the installation approval, dated May 2, 1989. I am also in the process of closing out the deposit/refund accounts associated with the removal/installation process. A separate deposit/refund is required to continue with

October 30, 1990  
Avis Rent A Car  
Page 2

oversight of the remediation process. Please submit a check for \$1,200.00, payable to Alameda County Division of Hazardous Materials within 30 days. This amount is to cover the time already used to review the investigation, and to cover additional oversight.

If you have any questions, please call me at 415/271-4320.

Sincerely,



Cynthia Chapman  
Hazardous Materials Specialist

c: Mr. Karl Westermann, Regional Director  
Mr. Steven LuQuire, RWQCB  
Mr. Ed Conti, MF&G

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SITE: 1 Neil Armstrong Way,  
Oakland

✓ R02891  
R01603

May 31, 1990

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

Ms. Beth L. Hamilton  
Pillsbury, Madison & Sutro  
Ten Almaden Boulevard  
San Jose, CA 95113

Dear Ms. Hamilton:

Our office has reviewed your letter, dated May 9, 1990, to Ms. Cynthia Chapman, that provides us with an update of activities that are occurring at the Avis facility. Thank you for responding to our questions about the tank removal activities.

The purpose of this letter is to inform you of the San Francisco Regional Water Quality Control Board's (RWQCB) position with regards to the disposition of the remediated stockpiled soils. It is important to note that the RWQCB is concerned with any impact to water quality. What may meet the non-hazardous classification by the DHS may still be considered a threat to water quality by the RWQCB. On-site disposal of hydrocarbon-contaminated soils requires the responsible party to file a Report of Waste Discharge (ROWD) in order for the RWQCB to issue Waste Discharge Requirements (WDR). The resulting on-site disposal would have to be consistent with CCR Title 23, Subchapter 15 requirements for discharges of waste to land, which means treating the site as a closed landfill.

This is a lengthy and expensive process, and the RWQCB staff is currently unable to review and prescribe WDRs for all on-site disposal requests. As a result, the RWQCB has issued a guidance document to all its Lead Implementing Agencies (LIA) that defines the criteria for soil excavated during fuel tank removals to be disposed of on-site without the need for WDRs or Subchapter 15 considerations. These criteria are:

1. One discrete soil sample is taken for every 20 cubic yards of soil for final characterization.
2. Soil analytical results indicate **non-detectable** concentrations of petroleum hydrocarbons and other pollutants of concern. RWQCB defines non-detectable as 10ppm or less, for TPH (both gas and diesel), and for total oil-and-grease.


Avis  
May 31, 1990  
Page 2 of 2

3. Site characteristics such as depth to ground water, ground water use, and soil permeability have been considered and it is determined that the discharge of soil appears to pose a minimal threat to water quality should characterization not prove representative of actual soil pollutant concentrations.
4. Ground water monitoring wells have been installed at the site, and quarterly monitoring will take place for a minimum of one year after soil disposal to verify no threat.
5. The technical reports for the site are properly reviewed and approved by the LIA or RWQCB.

All these criteria must be met for on-site disposal of petroleum contaminated soil. What is pertinent to Avis from these requirements is that discrete samples be taken for every 20 cubic feet of stockpiled soil, and that analyses indicate values equal to or less than 10 ppm before we will allow on-site disposal. The bio-remediation efforts currently in progress at this facility will not be affected by the above listed criteria unless the intent is to dispose of the soil on-site, in which case you need to know about the levels that are acceptable to the RWQCB.

If you have any questions, please call Cynthia Chapman at 415/271-4320.

Sincerely,

  
Edgar B. Howell, III  
Chief, Hazardous Materials Division

cc: Mr. Gil Jensen, Alameda County District Attorney  
Mr. Lester Feldman, RWQCB  
Ms. Corey Yup, DHS  
Mr. Karl Westermann, Avis  
Ms. Michele Heffes, Port of Oakland  
Ms. Ann Cuffner, OHM  
Mr. Jim Ritchie, Dames & Moore

ALAMEDA COUNTY  
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DAVID J. KEARS, Agency Director



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

February 26, 1990

Ms. Michele Heffes  
Port Of Oakland  
66 Jack London Square  
Oakland, CA 94604-2064

Dear Ms. Heffes:

This letter is to inform you that we have given Avis Rent-A-Car, located at 1 Neil Armstrong Way, Oakland, a permit for two underground storage tanks.

Currently, Avis has submitted workplans regarding remediation of hydrocarbon contaminated soils and impact to groundwater. Avis is keeping this office informed of on-going work.

If you have any questions regarding this site, please call Cynthia Chapman at (415) 271-4320.

Sincerely,

Edgar B. Howell III  
Acting Chief, HazMat Division

CC:cc

cc: Beth Hamilton, Pillsbury, Madison & Sutro