HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

February 19, 1997

Mr. Leroy Hernandez Greyhound Lines Inc. P.O. Box 660362 Dallas, Texas 75266-0362 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700

FAX (510) 337-9335

Ro#74

2103

RE: Oakland Bus Terminal - 2304 San Pablo Avenue, Oakland CA 94608 (STID # 3809)

Dear Mr. Hernandez:

This office has recently reviewed the most recent report prepared and submitted by Parsons Engineering Science, Inc. for the above referenced site.

The groundwater remediation system (free product recovery system) installed at the site can be terminated at this time since no measurable product had been detected in the four recovery wells (ES-1, ES-3, ES-5 and BC-1) since January 1996. However, the groundwater monitoring program must be continued to verify the effectiveness of the remediation treatment system implemented at the site.

The groundwater monitoring program must be conducted every quarter and should include the following tasks:

- a) monitoring of all the wells for the presence of free product
- b) measurement of groundwater elevation in all the wells to establish flow direction
- c) quarterly sampling of wells ES-1, ES-2, ES-3, ES-4, ES-5, ES-6, BC-1, BC-2 and BC-3
- d) annual sampling of wells ES-7, ES-8, and ES-11
- e) wells ES-9 and ES-10 can be dropped from the sampling program
- f) target analytes must include TPH gasoline, TPH diesel, BTEX and MTBE
- g) polynuclear aromatic hydrocarbons (PAHs) must be included as target analyte if TPH diesel is detected

The contents of this letter has been discussed with Mr. Christopher Torrel of Parsons Engineering Science, Inc.

Please contact me at (510) 567-6780 if you have any questions concerning this letter or the subject site.

Sincerely,

Susan L. Hugo, Senior Hazardous Materials Specialist

Mee Ling Tung, Director, Environmental Health
 Kevin Graves, San Francisco Bay RWQCB
 Christopher Torell, Parsons, 290 Elwood Davis Rd., Suite 312, Liverpool, NY 13088

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

STIP 3809 SITE: 2103 San Pablo Ave, Oakland, CA Coakland Bus Terminal)

R074

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

December 1, 1992 STID# 3809

DAVID J. KEARS, 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

Mr. Thomas Portele Greyhound Lines Inc. Environmental Department 802 Commerce Street, 3rd Floor Dallas, Texas 75202

RE: Request for a 30-day Extension for Closure Report Submittal

Dear Mr. Portele:

This letter documents the telephone conversation between Mr. Edward Roberts of Engineering Science, Inc. (ESI) and myself on November 30, 1992, concerning the request of ESI on behalf of Greyhound Lines, Inc. for a 30-day extension to submit the complete tank closure report. This department acknowledges the time involve in gathering and compiling all the requested documents and is extending the deadline for 30 days. Your tank closure report must be submitted to this office no later than December 30, 1992.

Please contact me at (510) 271-4530 if you have any questions concerning this letter.

Sincerely,

Susan L. Hugo

Susan Z. Hugo

Senior Hazardous Materials Specialist

CC: Rich Hiett, San Francisco Bay RWQCB Gil Jensen, Alameda County District Attorney's Office Edgar B. Howell, Chief, Hazardous Materials Division - files Edward Roberts, Engineering Science, Inc. - 290 Elwood Davis Road, Suite 312, Liverpool, NY 13088 James Baker, Engineering Science, Inc. - 290 Elwood Davis Road, Suite 312, Liverpool, NY 13088

R074

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY



DAVID J. KEARS, Agency Director

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

October 23, 1992 STID# 3809

Mr. Thomas Portele Greyhound Lines Inc. Environmental Department 802 Commerce Street, 3rd Floor Dallas, Texas 75202

RE: Investigation / Remediation at Oakland Bus Terminal (Greyhound # 8934) 2103 San Pablo Ave., Oakland, CA 94608

Dear Mr. Portele:

The Alameda County Department of Environmental Health, Hazardous Materials Division has recently reviewed the files concerning the removal of six underground storage tanks at the referenced site. This office is in receipt of the following reports:

* Phase Site Assessment of UST Systems, dated June 22, 1989 prepared by Brown and Cadwell Consulting Engineers

* Preliminary Site Investigation Report, dated January, 1992 prepared by Engineering Science, Inc.

* Monthly Monitoring Report, dated August 5, 1992, prepared by Engineering Science, Inc.

* Monthly Monitoring Report, dated August 19, 1992, prepared by Engineering Science, Inc.

* Hydrocarbon Recovery System Installation/Monitoring, dated October 1, 1992, prepared by Engineering Science, Inc.

* Monthly Monitoring Report, dated October 6, 1992, prepared by Engineering Science, Inc.

This department concurs with the basic elements of the proposed hydrocarbon recovery system to be installed at the site as an interim remedial action to remove free product. However, the following issues must be addressed concerning the on-going investigation/remediation at the referenced site:

* Currently, a total of eight monitoring wells are on site.
Monitoring wells ES-1, ES-2, ES-5, BC-1 have been detecting
free product, as high as 3.69 feet in ES-1 during the June
16, 1992. Monitoring wells ES-3, ES-4, BC-2 and BC-3 detected
elevated levels of dissolved petroleum hydrocarbon
contaminants during the July 8, 1992 sampling event. Clearly,
the lateral extent of groundwater contamination has not been
completely delineated. Additional wells must be installed to
identify the "zero line" at the leading edge of the plume.

Mr. Thomas Portele

RE: 2103 San Pablo Ave. Oakland, CA 94608

October 23, 1992

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- * Free floating product must be measured in all the wells using an optical probe or a comparable instrument capable of measuring free product to 0.01 foot. Free product must be recovered on a regular basis and total amount of free product recovered must be reported in the quarterly report. Free product removal must comply with the California Code of Regulations, Title 23, Section 2655.
- * Groundwater monitoring wells must be sampled on a quarterly basis and analyzed for the following target compounds: TPHg, TPHd, benzene, toluene, ethylbenzene and xylene.
- * Six underground storage tanks were removed in April 12, 1990. A complete closure report documenting all the work performed during the removal of the tanks has not been submitted to this office. Please submit this closure report which must include records of tanks disposal (manifests), records of stockpiled soil disposal, analytical results of samples collected during the removal, laboratory reports including quality control/quality assurance, and chain of custody documentation no later than November 30, 1992.
- * With regards to the hydrocarbon recovery system to be installed at the site, permits from other regulatory agencies must be followed. In addition, please provide this office with the following items:
 - rationales to substantiate the selection of the referred location of the extraction wells; will these extraction well locations address the dissolved hydrocarbon contaminant plume and prevent off-site migration?
 - contingency plan for system breakdown
 - estimate duration of the pump and treat operation
- * Please submit a time schedule for all phases of the investigation and remediation activities and the anticipated time when cleanup will be completed at the site.

A report must be submitted within 30 days after completion of this investigation. Until cleanup is complete, you will need to submit reports to this office and to RWQCB every three months (or at a more frequent interval, if specified at any time by either agency). In addition, the following items must be incorporated in your future reports or workplans:

 a cover letter from the responsible party or tank owner stating the accuracy of the report and whether he/she concurs with the conclusions and recommendations in the report or workplan Mr. Thomas Portele RE: 2103 San Pablo Ave. Oakland, CA 94608 October 23, 1992 Page 3 of 4

- site map delineating contamination contours for soil and groundwater based on recent data should be included and the status of the investigation and cleanup must be identified
- proposed continuing or next phase of investigation / cleanup activities must be included to inform this department or the RWQCB of the responsible party or tank owner's intention
- any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained
- historical records of groundwater level in each well must be tabulated to indicate the fluctuation in water levels
- tabulate analytical results from all previous sampling events; provide laboratory reports (including quality control/quality assurance) and chain of custody documentation

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 professionals involved with the project. Copies of reports must also be submitted to:

Rich Hiett RWQCB, San Francisco Bay Region 2101 Webster Street, Fourth Floor Oakland, California 94612

Because we are overseeing this site under the designated authority of the Regional Water Quality Control Board, this letter constitutes a formal requests 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 RWQCB.

Please contact me at (510) 271-4530 if you have any questions concerning this letter.

Sincerely,

Susan L. Hugo

Senior Hazardous Materials Specialist

Mr. Thomas Portele RE: 2103 San Pablo Ave. Oakland, CA 94608 October 23, 1992 Page 4 of 4

CC: Rich Hiett, San Francisco Bay RWQCB Gil Jensen, Alameda County District Attorney's Office Edgar B. Howell, Chief, Hazardous Materials Division - files Edward Roberts, Engineering Science, Inc. - 290 Elwood Davis Road, Suite 312, Liverpool, NY 13088 James Baker, Engineering Science, Inc. - 290 Elwood Davis Road, Suite 312, Liverpool, NY 13088

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY DAVID J. KEARS, Agency Director

29 September 1989

Vernon Soree Director Environmental Management Greyhound Lines, Incorporated 901 Main Street Suite 2500 Dallas, TX 75202 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

Subject: Removal of Underground Storage Tanks Located at 2103 San Pablo Avenue, Oakland, CA.

Dear Mr. Soree:

This office has received your letter dated 21 July 1989, pertaining to the discovery of six underground storage tanks and suspected soil/groundwater contamination at the location listed above. The Alameda County Department of Environmental Health, Hazardous Materials Division, oversees the removal of underground storage tanks and any remediation of contaminated sites within the City of Oakland.

Your letter stated that soil borings detected hydrocarbon contamination at a depth of fifteen to twenty feet. A copy of the data report for this site was not included in your letter, so the identity of the specific contaminants and whether or not groundwater has been impacted is unclear to this office. Please submit a copy of this report to us so that we may review the data and include it into our records.

In Alameda County, we issue a standard closure plan document which we request applicants to complete and submit in triplicate. A blank copy of this document is enclosed with this letter for your use. This form, when highlighted with the red "Accepted" stamp constitutes a legal permit authorizing the removal project to proceed. In addition to the closure plan, we require that a plot plan of the facility, a copy of the contractor's workman's compensation insurance certificate and a site safety plan also be submitted for review.

Prior to the review of a submitted closure plan the applicant is required to submit a deposit. This deposit is authorized by Section 3-141.6 of the Ordinance Code of the County of Alameda and is used to cover the expenses incurred by County personnel in the performance of their oversight duties. Upon the completion of the

Vernon Soree Greyhound Lines, Inc. 901 Main St. Suite 2500 Dallas, TX 75202 Re. 2103 San Pablo Ave, Oakland CA 29 September 1989 Page 2 of 3

the project the balance of the deposit is refunded to the applicant. For a project involving six underground storage tanks, a deposit of \$1,146.00 is required.

Common omissions on closure plans include; the EPA Identification Number of the facility, no listing of the historic contents of the tanks, suggesting improper soil analysis tests for the reported tank contents, not listing a registered hazardous waste hauler to remove the tank(s) from the job site following excavation and not signing the closure plan. Minimum requirements for a site safety plan include a statement that an explosimeter will be present to gauge tank atmospheric conditions prior to removal, identify a person with overall responsibility for site safety and specifying a minimum of two five extinguishers and level C protective clothing to be available to workers on the job site.

Upon approval of the submitted closure plan we request that you notify us a minimum of forty-eight hours in advance of the scheduled removal date. This is to allow our inspectors to organize their weekly schedules accordingly and facilitate our having a representative present to examine the tanks upon removal for obvious evidence of leakage and to observe the collection of soil samples.

Following the submittal of all analytical data, Chain of Custody Forms, hazardous waste manifests and the completion of any required remedial action, a sign-off letter will be issued. The County Billing Department will be notified to refund to you the balance of your deposit.

Though this office is the lead agency in regards to administering Title 23 of the California Code of Regulations within Alameda County, it is the responsibility of the San Francisco Bay Regional Water Quality Control Board to issue the final approval for all soil and groundwater remediation projects conducted within it's jurisdiction. This office will directly oversee the implementation of the project to ensure that the work conducted is in compliance with guidelines established by the Regional Board.

Vernon Soree Greyhound Lines, Inc. 901 Main St. Suite 2500 Dallas, TX 75202 Re. 2103 San Pablo Ave. Oakland, CA 29 September 1989 Page 3 of 3

If you have any questions or require further clarification concerning the underground tank removal process in Alameda County, please contact me at (415) 271-4320.

Sincerely,

Dennis J. Byrne

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Hazardous Materials Specialist

enclosure

cc: Rafat Shahid, Assistant Director, Alameda County Department of Environmental Health.

Howard Hatayama, DOHS. Lester Feldman, SFBRWQCB