

San Francisco Regional Office

1252 Quarry Lane  
 P.O. Box 9019  
 Pleasanton, CA 94566  
 (925) 426-2600  
 Fax (925) 426-1057

**Clayton**  
 ENVIRONMENTAL  
 CONSULTANTS

FACSIMILE

STUD 584

To: BARNEY CHAN

From: DON ASHTON

Date: 5-11-98

Fax Number: 510 337-9335

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**COMMENTS**

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RWC/CB LETTER TO MILLANUM HOLDINGS -  
 COLISRUUM WAY PROPERTIES - COMMENTS ON CLAYTON'S  
 MARCH 27, 1998 WORKPLAN.

IF ANY QUESTIONS, MY DIRECT # IS (925) 426-2679.

Clayton Environmental Consultants is a Division of Clayton Group Services, Inc.

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**San Francisco  
Bay Regional  
Water Quality  
Control Board**

2101 Webster St. #500  
Oakland, CA 94612  
(510) 286-1255  
FAX (510) 286-1380

**Samuel Friedman  
Millenium Holdings, Inc.  
200 International Circle, Suite 5000  
Hunt Valley, MD 21030**



**Pete Wilson  
Governor**

April 14, 1998  
File No. 2223.09 (DCL)

**Subject: Properties at 750-50th Avenue and 5050, 5051 and 5200 Coliseum Way, Oakland,  
Alameda County - Workplan for Remedial Investigation and Risk Assessment**

**Dear Mr. Friedman:**

Board staff have reviewed the March 27, 1998 report titled, "Workplan to Perform Additional Remedial Investigation and Prepare a Risk Assessment for the Coliseum Way Properties, Oakland, California", submitted by Clayton Environmental Consultants, on behalf of Millenium Holdings, Inc.. The workplan was produced in response to Board's February 18, 1998 letter requesting technical reports for additional remedial investigation, risk assessment and remediation/risk management plan. As explained below, I approve the workplan subject to five conditions.

The submitted report represents the workplan phase for additional remedial investigation and risk assessment. Specifically, Clayton is proposing to install eight new monitoring wells. TDS sampling and analysis will be incorporated into the new monitoring program consisting of existing and new wells. Two of the new wells, CW-6 and CW-7, will be located along the southeastern boundary of the 5200 Coliseum Way property to further investigate the southeasterly groundwater flow in this vicinity. CW-8 and CW-9 will also be located along the southeastern boundary of 5051 Coliseum Way property to evaluate the groundwater flow direction in this area. CW-10 through CW-13 will be installed along the stormwater sewer on the northwestern boundary of 5050 Coliseum Way. Data collected here will assist in defining the "potential for contaminants to follow the culvert base materials that may act as a conduit to surface waters."

Seven soil borings will be drilled along the northwestern boundary of the 750-50th Avenue and 5050 Coliseum Way properties for lithologic descriptions to define possible backfill areas and soil conditions. Clayton is also prepared to expand investigation of the petroleum hydrocarbon plume identified at the 5200 Coliseum Way property utilizing some of the existing and new wells in order to define its horizontal extent.

Finally, using the newly collected data, combined with historic information, Clayton will conduct a fate and transport study of the pollutants utilizing a yet unspecified model. In the process, "future pollutant migration pathways" will be evaluated. Moreover, a risk assessment based on the available information will be performed to examine toxicity, exposure and risk characterization on-site.

I concur with the scope of work proposed in the additional remedial investigation and risk assessment workplan with the following conditions:

1. The TDS results must be representative of background conditions. Samples should be taken from known "clean" wells/locations which are not already adulterated by pollutants on-site. TDS analysis should also be performed for the deep monitoring wells recommended in Condition 2 of this letter.
2. *need to identify which wells will be deep*  
The remedial investigation must define the vertical extent of groundwater pollution. The existing wells and new wells with their proposed drilling and screening depth will not likely present a clear picture of the vertical extent of the pollutants. Monitoring wells in deeper zones should be installed downgradient of areas with significant shallow groundwater pollution. However, these wells should be constructed with care in order to avoid cross contamination between water-bearing units.
3. In evaluating future pollutant migration pathways and performing fate and transport studies, Clayton should explain why the use of any model is appropriate. Ways to verify the modeling results should also be proposed. ~~requirements should be submitted for Board staff review by May 11, 1998.~~
4. Well screens for the new wells should be no longer than 10 feet. This would not only reduce the effect of "head averaging" but also provide a more accurate estimate of the vertical extent of contamination.
5. Potential future receptors to be considered in the risk assessment should include construction workers and commercial building occupants, in addition to the maintenance personnel. Moreover, if, based on the TDS results, groundwater in the deeper zones is shown to be a potential source of drinking water, potential impacts on the deep groundwater quality as a result of the pollution and the subsequent risks to water consumers should be evaluated.

Please contact Derek Lee of my staff at (510) 286-1041 if you have any questions.

Sincerely,

Loretta K. Barsamian  
Executive Officer

  
Stephen I. Morse, Chief  
Toxics Cleanup Division

cc. Dwight R. Hoenig  
Clayton Environmental Consultants  
1252 Quarry Lane  
P.O. Box 9019  
Pleasanton, CA 94566

**Charles W. Reesc, Jr.**  
**Lempres & Wulfsberg**  
**Kaiser Center**  
**300 Lakeside Drive, 24th Floor**  
**Oakland, CA 94612**

**Barney Chan**  
**ACDEH**  
**1131 Harbor Bay Parkway, 2nd Floor**  
**Alameda, CA 94502-6577**

**Yvonne J. Meeks**  
**Senior Environmental Engineer**  
**PG & E**  
**Mail Code B24A**  
**P.O. Box 770000**  
**San Francisco, CA 94177**