AGENCY



9-25-0)

DAVID J. KEARS, Agency Director

R00000313

September 24, 2001

Mr. John Beery John Beery Organization 2900 Main Street, Suite 100 Alameda, CA 94501 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700

FAX (510) 337-9335

RE: Additional Sampling at 2415 and 2425 Mariner Square, Alameda, CA

Dear Mr. Beery:

In the weeks following our meeting on September 10, 2001, I had a chance to further review the case file for the above referenced site. Currently there are plans to redevelop the site. A portion of the site will become a senior housing facility. The west portion will become a boat storage facility. Development of the site will probably result in the abandonment of some of the existing groundwater monitoring wells. Upon review of the case file, it appears that additional sampling is required at the site as follows:

- Previous subsurface investigations conducted identified elevated total petroleum hydrocarbons as diesel (TPHd) and motor oil (TPHmo) as well as lead in soil and/or groundwater. Groundwater samples collected in January 2001 from wells MW-5, MW-6A and MW-10 identified TPHd at concentrations that exceed the Tier 1 Petroleum Hydrocarbon Screening Levels for Saltwater Ecological Protection Zone (SEPZ). The TPHd screening level is 314 parts per billion. Please conduct another round of sampling of all onsite groundwater monitoring wells.
- A paint shed and painting activities took place along the west property line.
 Groundwater from wells MW-4, MW-6A and MW-9 should be analyzed for halogenated hydrocarbons (HVOCs) and CAM 17 metals.
- Water samples should be collected from the storm drain outlets along the concrete sheetpile wall.
- Inadequate samples were collected within the former North Sail facility were former above ground storage tanks were located. Shallow soil samples should be collected at 1.0 to 1.5 feet bgs and from 3 to 4 feet bgs from this area.
- PNAs analysis was not performed on shallow soil samples that contained elevated TPHd. Shallow soil samples should be collected in the vicinity of MW-6, MW-10, MS-4, MS-18, MS-19, MS-14, MS-12, SB-D.
- The structural integrity of the fire wall has not been ascertained. Additional grab groundwater samples should be collected within and outside of the fire wall.

Soil samples should be analyzed for TPHg, TPHd, TPHmo, BTEX, lead and/or PNAs. Be sure PNAs analysis includes analysis for 2-methylnaphthalene. Groundwater should be

John Beery re: Additional Sampling at 2425 Mariner Square, Alameda County September 24, 2001 Page 2 of 2

analyzed for the same constituents. Groundwater for lead analysis should be collected in unpreserved bottles for the laboratory to filter.

Attached is a site plan with recommended sampling locations. A workplan for additional sampling at the site is due within 45 days of the date of this letter, or by November 13, 2001. Data collected from this phase of investigation will help to determine location(s) of permanent and/or replacement groundwater monitoring wells, if deemed necessary, and if additional assessment would be required at 2425 Mariner Square (senior housing site). If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

attachment

c: Gary Pischke, Earth Systems, 47853 Warm Springs Blvd, Fremont, CA 94539 Helen Mawhinney, Greensfelder & Assoc, 1548 Jacob Ave, San Jose, CA 95118





ENVIRONMENTAL HEALTH SERVICES

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

November 13, 2000

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94601 STID 2945

> RE: 2415 Mariner Square Drive, Alameda, CA

Dear Mr. Beery:

I have reviewed the First Semi-Annual Groundwater Sampling report dated October 2000 that was prepared by Earth Systems Consultants. This report identified three oil-filled 5 gallon buckets plus smaller containers located beneath the stairs on the north side of the building in the northwestern corner of the property. The location of MW-10 is downgradient of the leaking 5-gallon used oil containers. The age of these containers is unknown, but the staining on the concrete did not appear to be new. I agree with your consultant that the possibility exists that the used oil from the containers is the source of free product in well MW-10. The waste oil in these containers must be taken off-site immediately to a licensed hazardous waste facility for disposal or recycling. Please submit a copy of the receipt to this office.

Monitoring well MW-6 contained bunker oil hydrocarbons which was the fuel used by the ships that formerly transported various fuels to and from the site and vicinity. This well is next to the property line. I agree with your consultant that the possibility exists that the bunker oil present in well MW-6 originated off-site. Your consultant has spoken to the consultant for the property owner (Navy) for the property adjacent to MW-6. Please have your consultant forward to this office the name, mailing address and telephone number of this consultant so that we can contact them.

I have been assigned to another position within my department. Tom Peacock, my supervisor will assign a new caseworker to this project. Tom can be contacted at (510) 567-6782.

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94601 November 13, 2000 Page 2

If you have any questions, please contact me at (510) 567-6774.

Sincerely

Larry Seto

Sr. Hazardous Materials Specialist

Cc: Gary Pischke, Earth Systems Consultants, 47853 Warm Springs Blvd., Fremont CA 94539-7400

DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

(510) 567-6700

FAX (510) 337-9335

June 23, 2000

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94501 STID 2945

RE:

2415 Mariner Square Drive, Alameda, CA 94501

Dear Mr. Beery:

I spoke to Mr. Chuck Headlee with the San Francisco Bay Regional Water Quality Control Board today concerning the closure request for the above site. We concur after reviewing the historical groundwater data that the plume underneath the site has not stabilized, and that additional monitoring must be performed on monitoring wells MW-5, MW-6A, MW-9 and MW-10. These wells must be monitored on a semi-annual basis for a minimum of two monitoring events to verify the plume has stabilized or is diminishing in size. Once the plume has stabilized a request for site closure can be made to the Regional Board.

In addition, as per the recommendation in the Risk Assessment dated February 1999 prepared by Earth Systems, soil with concentrations of lead above 400 ppm and naphthalene above 49 ppm should be removed from the site and disposed of at the appropriate licensed facility.

Monitoring and sampling of monitoring wells MW-2, MW-3 and MW-4 may be discontinued.

If you have any questions, please contact me at (510) 567-6774.

Sincerely

Śr. Hazardous Materials Specialist

Cc: Chuck Headlee, Regional Water Quality Control Board, 1515 Clay Street, Suite 1400, Oakland, CA 94612

Gary Pischke, Earth Systems Consultants, 47853 Warm Springs Blvd., Fremont, CA 94539

DAVID J. KEARS, Agency Director



SENT 6-2-2000

R0313

ENVIRONMENTAL HEALTH SERVICES

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

June 2, 2000

Mr. Bill Mabry Aegis Assisted Living 220 Concourse Blvd. Santa Rosa, CA 94503 STID 2945

RE: 2425 Mariner Square, Alameda, CA 94501

Dear Mr. Mabry:

Enclosed is a corrected copy of my letter to you dated May 17, 2000. Please note the change on page 3, item 2, "The groundwater at the site is **not** considered drinking water quality." Please discard my letter of May 17, 2000 and replace it with my letter dated June 2, 2000.

If you have any questions, please call me at (510) 567-6774.

Sincerely,

Largy Seto

Sr. Hazardous Materials Specialist

Cc: John Beery, 2900 Main Street, Suite 100, Alameda, CA 94501

AGENCY

DAVID J. KEARS, Agency Director



SENT 6/2/2002-

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

June 2, 2000

Mr. Bill Mabry Aegis Assisted Living 220 Concourse Blvd. Santa Rosa, CA 94503 STID 2945

RE: 2425 Mariner Square, Alameda, CA

Dear Mr. Mabry:

This site was part of the parcel of 2415 Mariner Square, Alameda. The property owner, John Beery subdivided the parcel into two parcels. The western parcel (industrial/commercial) will retain the address of 2415 Mariner Square. The eastern parcel (residential) new address is 2425 Mariner Square.

Both parcels 2415 and 2425 Mariner Square was marshland prior to filling with "hydraulic fill" in the late 1800's, and was then the site of bulk fuel storage and distribution activities as early as 1916. The site was previously owned by Tidewater/Texaco then Phillips Petroleum, and was used for bulk fuel storage and distribution of refined oils, motor lubricants, and fuel oils for ships until 1972. Since 1972, the site use has been mixed office, restaurant, boat sales, sail manufacturing, boat motor repair, automobile repair, boat hull repair, boat hull stripping and painting.

SOIL SUMMARY AND EVALUATION

The borings advanced on the residential portion include MS-1 through MS-4, MS-11, MS-13 MS-14, MS-23, SB-A, and SB-B. Soil samples from borings MS-1, MS-3, MS-4, MS-11, MS-13, MS-14 and MS-23 were analyzed for TRPH, BTEX and VOC's. Soil samples from borings SB-A at 1.5 feet, and SB-B at 1.5 feet bgs were analyzed for total organic carbon. Soil samples SB-A and SB-B were analyzed for 17 metals at 1.5 feet, and for total lead at 3.0 feet. The soil sample from SB-A at 5.5 feet bgs was analyzed for BTEX, vinyl chloride and total organic carbon. TRPH was detected at concentrations ranging from nondetectable (MS-1) to 13,000 ppm (MS-4). Benzene was below detection limits. TEX and VOCs concentrations ranged from nondetectable to 1.2 ppm (MS-4).

Mr. Bill Mabry Aegis Assisted Living 220 Concourse Blvd. Santa Rosa, CA 94503 Page 2 of 3

The monitoring wells installed on the residential portion include MW-1, MW-7 and MW-8. In addition, well MW-5 is located north and adjacent to the northern boundary of the residential portion. Due to the lack of photoionization detector (PID) readings, no soil samples from well MW-8 were analyzed. The soil sample collected from well MW-1 and MW-5 were analyzed for TPH(d), oil and grease, BTEX and VOCs. The soil sample collected from well MW-7 was analyzed for TPH(g), TPH(d), TPHmo, BTEX, VOCs, and vinyl chloride. All analytes were below detection limits in the sample from MW-1. Oil and grease, benzene and VOCs were not detected in the sample from MW-5. TPH(d) and TEX were detected in MW-5 at 220 ppm, 0.5 ppm, 1.6 ppm and 1.4 ppm respectively. TPH(g), TPH(d), benzene, total xylenes, and vinyl chloride were not detected in the sample from MW-7. TPHmo and toluene were detected in the sample from MW-7 at 200 and 0.014 ppm respectively.

GROUNDWATER SUMMARY AND EVAULATION

The following summary is based on the analytical results of groundwater samples collected from wells MW-1, MW-7, and MW-8 within the residential portion of the site. TPH(g) has ranged from nondetectable to 750 ppb, TPH(d) has ranged from nondetectable to 1,800 ppb, and TPHmo has been nondetectable in all three wells except for 110 ppb in MW-1 on 6/24/99 and 130 ppb in MW-8 on 9/9/99. Benzene has ranged form nondetectable to 89 ppb, and the highest level of TEX was 64 ppb total xylenes. MTBE was not detected in wells MW-1 or MW-8. Although, MTBE was detected at concentrations of 16 and 34 ppb in well MW-7 on 2/18/98 and 5/8/98 respectively, vinyl chloride has not been detected in these wells.

Well MW-5 is located north of and adjacent to the northern boundary of the residential portion. However, due to the proximity to the residential portion, the analytical results are summarized. TPH(g) has ranged from 290 to 9,000 ppb, TPH(d) has ranged from nondetectable to 8,800 ppb, and TPHmo has ranged from nondetectable to 860 ppb. Benzene has ranged from 1.2 to 48 ppb, and the highest level of TEX was 49 ppb ethylbenzene. MTBE has ranged from nondetectable to 12 ppb. Vinyl chloride has not been detected in well MW-5. Lead was detected in well MW-5 at 82 ppb on 5/25/93 and nondetectable on 9/26/94.

The primary contaminant of concern in groundwater is benzene. The possible exposure pathway is volatilization from groundwater to the enclosed space of the residential structure, and the calculated risk is between 1E-05 and 1E-06. However, the actual risk of exposure by this pathway is minimal due to the proposed configuration of buildings and pavement.

Mr. Bill Mabry
Aegis Assisted Living
220 Concourse Blvd.
Santa Rosa, CA 94503
Page 3 of 3

The Saltwater Ecological Protection Zone (SEPZ) at the San Francisco International Airport (SFIA) was used in the Risk Assessment as a basis for comparison of similar background conditions. The residential portion is within the SEPZ 300 foot evaluation area. The benzene concentrations in groundwater sample results reported from the three well within the parcel and well MW-5 is, on average below the SEPZ value of 71 ppb. The SFIA SEPZ value for TPH(g) is 9,150 ppb. The TPH(g) concentrations from the three parcel wells and MW-5 average below this value.

To evaluate the risk to human health and environment due to the remaining contamination at the site, a Risk-Based Corrective Action (RBCA) Tier 2 evaluation using a residential scenario was performed. The results for the assessment of the site indicate the following:

- 1) Hydrocarbons remaining in soil will not likely further impact groundwater at the site. Volatile compounds were not reported in the soil samples from the site.
- Volatile compounds remaining in groundwater do not pose a significant risk to residential use of the parcel. The groundwater at the site is not considered drinking water quality. Continued groundwater monitoring and sampling has not shown significant change in the three wells located on the residential parcel.
- The risk of exposure to soil and groundwater is currently low due to the present configuration and in the proposed residential configuration. The receptor pathways are limited to dermal contact during construction and excavation.
- 4) Base upon the Risk Assessment, no remediation is necessary for 2425 Mariner Square Drive, Alameda, CA 94502

Presently there are four monitoring wells (MW-1, MW-5, MW-7 & MW-8) on the property at 2425 Mariner Square Drive, Alameda, CA. Monitoring well MW-5 will be relocated from the residential parcel to the commercial parcel. Sampling of monitoring wells MW-1, MW-7 and MW-8 has been discontinued.

If you have any questions, please contact me at (510) 567-6774.

Larry Seto

Sincerely

Sr. Hazardous Materials Specialist

Cc: John Beery, 2900 Main Street, Suite 100, Alameda, CA 94501 Files



AGENCY

DAVID J. KEARS, Agency Director

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FAX (510) 337-9335

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

May 17, 2000

Mr. Bill Mabry Aegis Assisted Living 220 Concourse Blvd. Santa Rosa, CA 94503 STID 2945

RE: 2425 Mariner Square, Alameda, CA

Dear Mr. Mabry:

This site was part of the parcel of 2415 Mariner Square, Alameda. The property owner, John Beery subdivided the parcel into two parcels. The western parcel (industrial/commercial) will retain the address of 2415 Mariner Square. The eastern parcel (residential) new address is 2425 Mariner Square.

Both parcels 2415 and 2425 Mariner Square was marshland prior to filling with "hydraulic fill" in the late 1800's, and was then the site of bulk fuel storage and distribution activities as early as 1916. The site was previously owned by Tidewater/Texaco then Phillips Petroleum, and was used for bulk fuel storage and distribution of refined oils, motor lubricants, and fuel oils for ships until 1972. Since 1972, the site use has been mixed office, restaurant, boat sales, sail manufacturing, boat motor repair, automobile repair, boat hull repair, boat hull stripping and painting.

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Mr. Bill Mabry Aegis Assisted Living 220 Concourse Blvd. Santa Rosa, CA 94503 Page 2 of 3

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Mr. Bill Mabry Aegis Assisted Living 220 Concourse Blvd. Santa Rosa, CA 94503 Page 3 of 3

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To evaluate the risk to human health and environment due to the remaining contamination at the site, a Risk-Based Corrective Action (RBCA) Tier 2 evaluation using a residential scenario was performed. The results for the assessment of the site indicate the following:

- 1) Hydrocarbons remaining in soil will not likely further impact groundwater at the site. Volatile compounds were not reported in the soil samples from the site.
- Volatile compounds remaining in groundwater do not pose a significant risk to residential use of the parcel. The groundwater at the site is considered drinking water quality. Continued groundwater monitoring and sampling has not shown significant change in the three wells located on the residential parcel.
- 3) The risk of exposure to soil and groundwater is currently low due to the present configuration and in the proposed residential configuration. The receptor pathways are limited to dermal contact during construction and excavation.
- 4) Base upon the Risk Assessment, no remediation is necessary for 2425 Mariner Square Drive, Alameda, CA 94502

Presently there are four monitoring wells (MW-1, MW-5, MW-7 & MW-8) on the property at 2425 Mariner Square Drive, Alameda, CA. Monitoring well MW-5 will be relocated from the residential parcel to the commercial parcel. Sampling of monitoring wells MW-1, MW-7 and MW-8 has been discontinued.

If you have any questions, please contact me at (510) 567-6774.

Sincerely

Larry Solo

Sr. Hazardous Materials Specialist

Cc: John Beery, 2900 Main Street, Suite 100, Alameda, CA 94501 Files



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RO313

DAVID J. KEARS, Agency Director

March 2, 2000

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

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94501 STID 2945

RE: 2415 Mariner Square Drive, Alameda, CA 94501

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Beery:

This letter is to inform you of new legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, you have been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.

LANDOWNER NOTIFICATION

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94501 March 2, 2000 Page 2 of 4

In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

You may use the enclosed "notice of proposed action" form (sample letter 3) as a template to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

Please call me at (510) 567-6774 should you have any questions about the content of this letter.

Sincerely

zarry Seto

Sr. Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94501 March 2, 2000 Page 3 of 4

SAMPLE LETTER (2): LIST OF LANDOWNERS FORM

Name of local agency Street address City

SUBJECT: CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR (Site Name and Address)

(Note: Fill out item 1 if there are multiple site landowners. If you are the sole site landowner, skip item 1 and fill out item 2.)

- 1. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, *(name of primary responsible party)*, certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:
- 2. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (<u>name of primary responsible party</u>), certify that I am the sole landowner for the above site.

Sincerely,

Signature of primary responsible party

Name of primary responsible party

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94501 March 2, 2000 Page 4 of 4

SAMPLE LETTER 3: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY
Name of local agency Street address City
SUBJECT: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY FOR (Site Name and Address)
In accordance with section 25297,15(a) of Chapter 6.7 of the Health & Safety Code, In accordance with section 25297,15(a) of Chapter 6.7 of the Health & Safety Code, In ame of primary responsible party), certify that I have notified all responsible andowners of the enclosed proposed action. Check space for applicable proposed action(s):
cleanup proposal (corrective action plan)
site closure proposal
local agency intention to make a determination that no further action is required
local agency intention to issue a closure letter
Sincerely,
Signature of primary responsible party
Name of primary responsible party
cc: Names and addresses of all record fee title owners

AGENCY

DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES

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

February 8, 2000

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94501 STID 2945

RE: 2425 Mariner Square Drive, Alameda, CA 94502 (former parcel of 2415 Mariner Square, Alameda, CA)

Dear Mr. Beery:

I spoke with Mr. Chuck Headlee with the San Francisco Bay Region, Regional Water Quality Control Board concerning your request to close monitoring wells MW-1, MW-7 and MW-8. Monitoring and sampling of these wells has ceased, and the property is going to be transferred over to the new property owner in the very near future. Mr. Headlee informed me it is acceptable to close out the three monitoring wells with the understanding that hydropunch samples maybe required to obtain site closure (2415 & 2425 Mariner Square Drive). The request to obtain groundwater samples will only be made if there is evidence the groundwater in the vicinity of the former monitoring wells maybe impacted.

If you have any questions, please contact me at (510) 567-6774.

MA

Sincere

Lapry Seco

Sr. Hazardous Materials Specialist

Cc: Bill Mebry, Aegis, 9066 Brooks Road, South, Windsor, CA 95492 Gary Pischke, Earth Systems Consultants, 47853 Warm Springs Blvd, Fremont, CA 94539

Chuck Headlee, 1515 Clay Street, Suite 1400, Oakland, CA 94612

Sent 1/20/20 Including ec's

January 19, 2000

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway Alameda, CA 94502-6577 (510) 567-6700 (510) 337-9432

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94601 STID 2945

DAVID J. KEARS, Agency Director

2415 Mariner Square Drive, Alameda, CA RE:

Dear Mr. Beery:

I have reviewed the Fourth Quarter 1999 Groundwater Sampling report dated December 28, 1999 that was prepared by Earth Systems Consultants. It is acceptable to discontinue sampling of monitoring wells MW-1 and MW-8. When site closure is obtained, these wells can be properly closed out.

If you have any questions, please contact me at (510) 567-6774.

Sincerely

Sf. Hazardous Materials Specialist

Gary Pischke, Earth Systems Consultants, 47853 Warm Springs Blvd., Cc: Fremont, CA 94539-7400





Sent 1/20/00 Including ec's

DAVID J. KEARS, Agency Director

January 19, 2000

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway Alameda, CA 94502-6577 (510) 567-6700 (510) 337-9432

Mr. Bill Mebry Aegis 9066 Brooks Road, South Windsor, CA 95492 STID 2945

Subject: 2425 Mariner Square Drive, Alameda, CA 94502

Dear Mr. Mebry:

Mariner Square Associates has informed the Alameda County Health Care Services Agency (ACHCSA) that it intends to sell the southeastern portion of its property located at 2425 Mariner Square Drive, Alameda in Alameda County (Site). Since 1990, the ACHCSA has been the lead agency in connection with the investigation and remediation of soil and groundwater contamination at the Site. Over the past ten years, Mariner Square Associates has cooperated fully with the ACHCSA, and it has committed to do so in the future.

This Site was part of the parcel with the address 2415 Mariner Square Drive, Alameda. The property owner, John Berry (Mariner Square Associates) divided the parcel into two portions. The western parcel (industrial/commercial) will retain the address of 2415 Mariner Square Drive. The southeastern portion (residential) has the new address of 2425 Mariner Square Drive.

An extensive subsurface investigation has been conducted at the Site. Technical reports submitted by Mariner Square Associates consultants indicate that thirty-eight soil borings were drilled where evidence existed of potential contaminant releases. Ten monitoring wells were installed, and are currently on site. (Monitoring well MW-6 was accidentally destroyed and replaced with MW-6A). The wells and borings have defined the extent of contamination on the Site. Limited remediation, soil and product removal has been performed in the area of MW-6.

To evaluate the risk to human health and the environment of the remaining contamination at the site, a risk assessment was performed on both parcels. An industrial/commercial scenario was used for the industrial parcel (2415 Mariner Square), and a residential scenario was used for the residential parcel (2425 Mariner Square) The risk assessment

Mr. Bill Mebry Aegis 9066 Brooks Road South Windsor, CA 95492 Page 2 of 3

found that the remaining high concentrations of soil over risk levels are located on the industrial parcel. The results for the assessment of the site indicate the following:

- Hydrocarbons remaining in soil will not likely further impact groundwater at the site. Volatile compounds were not reported in the soil samples from the site.
- Volatile compounds remaining in groundwater do not pose a significant risk to residential use of the parcel. The groundwater at the site is not considered drinking water quality. Continued groundwater monitoring and sampling has not shown significant change in the three wells located on the residential parcel.
- The risk of exposure to soil and groundwater is currently low due to the present configuration and in the proposed residential configuration. The receptor pathways ware limited to dermal contact during construction and excavation.
- 4) Based upon the Risk Assessment, no remediation has been proposed on the residential portion of the subject site.

The Risk Assessment was accepted by the ACHCSA with conditions for additional monitoring and sampling of all monitoring wells for one quarter followed by additional sampling if the initial round identifies contaminates of concern. Presently, there are four monitoring wells (MW-1, MW-5, MW-7 & MW-8) on the residential portion of the site. Monitoring well MW-5 will be relocated from the residential parcel to the commercial parcel. Sampling of monitoring wells MW-1, MW-7 and MW-8 has been discontinued. When the Site obtains site closure, these three wells can be properly closed.

ACHCSA considers Mariner Square Associates to be the primarily responsible party in connection with the remediation of contamination at the Site, and the ACHCSA expects that Mariner Square Associates will continue to implement the current remedial action plan until closure is obtained. ACHCSA and the Region Water Quality Control Board, San Francisco Bay Region does not pursue prospective purchasers where the primarily responsible party has the financial resources necessary to conduct the remediation, and where that responsible party is satisfactorily engaged in active remediation.

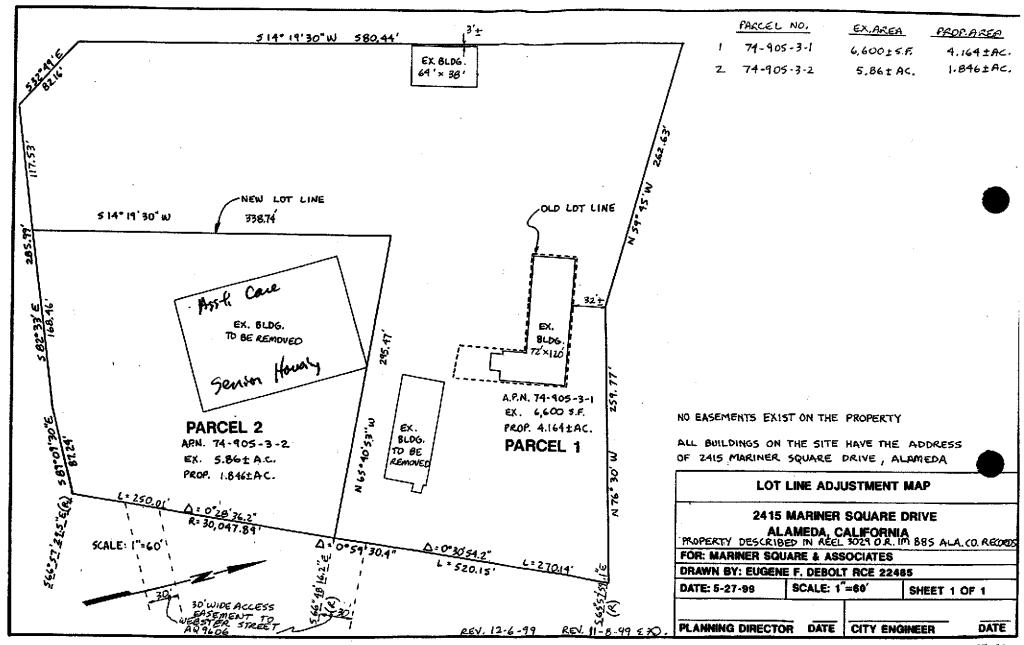
Mr. Bill Mebry Aegis 9066 Brooks Road South Windsor, CA 95492 Page 3 of 3

If you have any questions, please contact me at (510) 567-6774.

Larry Seto

Sr. Hazardous Materials Specialist

Cc: John Beery, Mariner Square & Associates, 2900 Main Street, Suite 100, Alameda, CA 94501



SENT 10-19-29 INCLUDING CO'S

ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

R0313

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

October 18, 1999

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94601 STID 2945

RE: 2415 Mariner Square Drive, Alameda, CA

Dear Mr. Beery:

I have reviewed your Third Quarter 1999 Groundwater Sampling report dated October 11, 1999 that was prepared by Earth Systems Consultants Northern California (ESCNC). ESCNC recommended destroying monitoring wells MW-4, MW-7 and MW-9. It is the County's policy not to destroy any normally functioning monitoring well until site closure has been granted from the RWQCB.

It was agreed upon in our meeting on October 13, 1999 that MW-4 was going to be left in place to monitor any contaminates that maybe coming off-site from the Alameda Naval Annex. In addition, MW-5 is going to be destroyed during the construction phase (approximately Jan. 2000), but will be replaced.

Sampling of monitoring wells MW-7 and MW-9 may be discontinued at this time.

If you have any questions, please contact me at (510) 567-6774.

Larry Seto

Sr. Hazardous Materials Specialist

Cc: Gary Pischke, Earth Science Consultants, 47853 Warm Springs Blvd., Fremont, CA 94539

AGENCY



SENT 10-4-99 (1) OHN BEERY

PO313

DAVID J. KEARS, Agency Director

October 1, 1999

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

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94601

RE: 2415 Mariner Square Drive, Alameda, CA

Dear Mr. Beery:

I have reviewed your Well Installation and Groundwater Sampling report dated September 1999 that was prepared by Earth Systems Consultants. The groundwater sample collected on June 24, 1999 from monitoring well MW-1 contained 110 ppb of TPHmo. This is the first time motor oil was detected in this monitoring well. A minimum of one additional round of sampling from MW-1 must be performed before reevaluating it for closure.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,

Larry Seto

Sr. Hazardous Materials Specialist

ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0313

ENVIRONMENTAL HEALTH SERVICES

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

June 15, 1999

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94601 STID 2945

RE: 2415 Mariner Square Drive, Alameda, CA

Dear Mr. Beery:

Below is a general summary of the status of the above site:

Western Industrial Parcel

The parcel is suitable for building of the dry stack structure with the following conditions: 1) Five monitoring wells will remain within the parcel which will be monitored and sampled for a minimum of one year. Based upon the first year results, monitoring frequency maybe reduced. 2) Monitoring well MW-6 will be replaced and one temporary/permanent monitoring well will be installed adjacent to former UST T-1 3) At this time, with the information and data available to this office, no further remediation will be required for the parcel. After one year of monitoring, the site will be reviewed for closure. The remaining monitoring wells will be destroyed after site closure is granted.

Eastern Residential Parcel

The parcel is suitable for building of the residential structure with the following conditions: 1) At this time, with the information and data available to this office, no further remediation will be required for the parcel. 2) Monitoring wells MW-1, MW-7 and MW-8 within the parcel will be monitored one more time. If the results indicate there is no threat to the public health or environment, the parcel will be evaluated for closure.

If you have any questions, please contact me at (510) 567-6774.

Sincerely

Larry Seto Sr. Hazardous Materials Specialist

Gary Pischke, Earth Systems Consultants, 47853 Warm Springs Blvd., Fremont, CA 94539-7400 Cc:

AGENCY



DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES

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

June 4, 1999

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94601

> 2415 Mariner Square Drive, Alameda, CA RE:

Dear Mr. Beery:

I have reviewed your Workplan for Groundwater Sampling and Well Installation dated May 20, 1999 that was prepared by Earth Systems Consultants. It is acceptable.

Before MW-1, MW-4, and MW-7 through MW-9 are destroyed, contact this office for concurrence.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,

Larry Seto

Sr. Hazardous Materials Specialist

Gary Pischke, Earth Systems Consultant, 47853 Warm Springs Blvd. Cc. Fremont, CA 94539-7400

HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#313

January 25, 1999

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

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94601

RE:

2415 Mariner Square Drive, Alameda, CA

Dear Mr. Beery:

A letter from this office dated October 27, 1998 requested that a workplan be submitted to install a replacement monitoring well for MW-6. Monitoring well MW-6 was accidentally destroyed on April 28, 1998. As of this date, this office has not received this workplan. Please submit a workplan within 45 days identifying the location of this replacement well.

If you have any questions, please contact me at (510) 567-6774.

Sincerely

Larry Seto

Sr. Hazardous Materials Specialist

Gary Pischke, Earth Systems Consultants, 47853 Warm Springs Blvd., Fremont, CA 94539

HEALTH CARE SERVIC

DAVID J. KEARS, Agency Director



RO#313

January 25, 1999

ENVIRONMENTAL HEALTH SERVICES

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

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94601

RE:

2415 Mariner Square Drive, Alameda, CA

Dear Mr. Beery:

I have reviewed your report titled "Results of Soil Samples Collected Beneath Pipelines Near MW-2 and MW-5. Portions of pipeline PL2 along the building, and approximately 60 feet perpendicular to the building was inaccessible because the overlying concrete was not cut correctly. This office concurs with your consultant that the concrete should be cut correctly, the pipeline removed, and soil samples taken and submitted to a laboratory for analysis. Please contact this office before work commences on the complete removal of pipeline PL2.

If you have any questions, please contact me at (510) 567-6774.

Sincerely

Sr. Hazardous Materials Specialist

Gary Pischke, Earth Systems Consultants, 47853 Warm Springs Blvd., Fremont, CA 94539





DAVID J. KEARS, Agency Director

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

November 19, 1998

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94601

RE:

2415 Mariner Square Drive, Alameda, CA

Dear Mr. Beery:

I have reviewed your MW-5 Former Bulk Fuel Pipeline Excavation and PNA Sapling Workplan dated November 11, 1998 that was prepared by Earth Systems Consultants. It is acceptable with the condition that the soil samples from the excavation be tested for the presence of MTBE.

If you have any questions, please contact me at (510) 567-6774.

Sincerel

Sr. Hazardous Materials Specialist

Cc: Gary Pischke, Earth Systems Consultants, 47853 Warm Springs Blvd., Fremont, CA 94539-7400

AGENCY



DAVID J. KEARS, Agency Director

October 27, 1998

R0#313

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

Mr. John Beery Mariner Square & Associates 2900 Main Street, Suite 100 Alameda, CA 94501

RE: 2415 Mariner Square Drive, Alameda, CA

Mr. Beery:

I have reviewed the Results of Hydropunch Samples Near Former Well MW-6 dated October 9, 1998 that was prepared by Earth Systems Consultants. I agreed with your consultant that a replacement monitoring well should be installed on-site to replaced MW-6 that was accidentally destroyed on 4/28/98. Please submit a workplan identifying the location of this replacement well.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,

Larry Seto

Sr. Hazardous Materials Specialist

Cc: Gary Pischke, Earth Systems Consultants, 47853 Warm Springs Blvd.,

Fremont, CA 94539-7400



DAVID J. KEARS, Agency Director

July 30, 1998

R0#313

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

Mr. John Beery John Berry Organization 2900 Main Street, Suite 100 Alameda, CA 94501 STID 2945

RE: 2415 Mariner Boat Yard, 2415 Mariner Square Drive, Alameda, CA

Dear Mr. Berry:

I would like to clarify item #3 in my letter to you dated November 10, 1997. The first sentence should read, "The area under the buildings should be excavated to the maximum extent possible where contamination is present.

Please submit a site map drawn to scale with the proposed locations for the hotel and the boat storage building. In addition, identify the boundary lines of the two parcels, and locations of the monitoring wells and soil borings.

On July 14, 1998, Madhulla Logan and I met with your consultant, Gary Pischke representing Earth System Consultants. During our meeting, we came to the following agreements listed below.

Risk assessment will be done using two scenerios. The hotel will be done using a residential scenario. The boatyard will use a commercial scenario. The risk to construction workers should also be identified, and appropriate Health and Safety measures should be addressed in a risk management plan.

Polynuclear Aromatics (PNA's) - Pischke will review file to get PNA data to use in the risk assessment. If none is available, soil samples will be collected near MW-5 and tested for PNA's.

Three hydropunch will be advanced in the former location of MW-6. The data generated will be used in the risk assessment.

MW-6 will be replaced, and groundwater monitoring will be done on a quarterly basis through April 1999. At that time, the monitoring schedule will be reviewed for `... modification.

The abandoned pipeline between MW-2 & MW-5 will be removed. The soil samples collected every 20 linear feet beneath the pipeline will be tested for the presence of PNA's.

Random confirmation soil samples will be taken after grading in hot spots and in locations under the proposed buildings. Sampling will be taken using a grid sampling plan. Four samples will be composite in the laboratory, and analyzed for all compounds detected at the site from the previous investigations.

Soil containing greater than 2,000 ppm of TRPH and 1,000 ppm of lead in the proposed parking lot areas must be remediated to concentrations below these levels, or excavated and disposed off-site.

Soil containing greater than 2,000 ppm of TRPH and 400 ppm lead in the locations under the proposed building, covered areas, and landscape areas must be remediated to concentrations below these levels, or excavated and disposed off-site.

Copies of all manifest and disposal receipts for off-site disposal of soil and groundwater must be submitted to this office.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,

Łarry Seto

Sr. Hazardous Materials Specialist

Cc: Gary Pischke, Earth System Consultants, 47853 Warm Springs Blvd., Fremont, CA 94539

Madhulla Logan, Environmental Health

AGENCY



DAVID J. KEARS, Agency Director

R0#313

July 2, 1998

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway Alameda, CA 94502-6577 (510) 567-6700 (510) 337-9432

Mr. John Beery John Beery Organization 2900 Main Street, Suite 100 Alameda, CA 94501 STID 2945

RE: Mariner Boat Yard, 2415 Mariner Square Drive, Alameda, CA

Dear Mr. Beery:

This letter is to confirm our agreement during our meeting today that the abandoned underground pipeline from the above ground tank between MW-5 and MW-2 will be removed within 45 days. Soil samples will be taken every 20 linear feet and submitted to a certified laboratory for analysis. The samples should be tested for TPH(d), TPH(mo), TPH(g), BTEX, MTBE and lead.

If you have any questions, please contact me at (510) 567-6774.

1993

Sincerel

Larry Seto

Sr. Hazardous Materials Specialist

Cc: Gary Pischke, Hydro Environmental Technologies, 2394 Mariner Square Drive,

Suite 2, Alameda, CA 94501

AGENCY



DAVID J. KEARS, Agency Director

<u> RO313</u>

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway Alameda. CA 94502-6577 (510) 567-6700 (510) 337-9432

June 2, 1998

Mariner Boat Yard 2415 Mariner Sq. Dr. Alameda, CA 94501

Re:

Ca. Hazardous Materials Inventory Reporting Form

Dear Sir or Madam:

Our records indicate that you have not submitted the above form as previously requested. Enclosed is another form to be completed and submitted to this office within 30 days.

If you have any questions, you may contact me at 567-6746.

Sincerely,

Don Hwang

Hazardous Materials Specialist

Enclosure 1

AGENCY

DAVID J. KEARS, Agency Director



R03/3

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

November 10, 1997

Mr. John Beery John Beery Organization 2900 Main Street, Suite 100 Alameda, Ca 94501

STID 2945

RE: Mariner Boat Yard, 2415 Mariner Square Drive, Alameda, CA

Dear Mr. Beery:

Ms. Madhulla Logan and I have discussed your proposed locations for a hotel at the above site that was submitted by Hydro Environmental Technologies, Inc. (HETI). Ms. Logan has spoken with Mr. Gary Pischke of HETI concerning your proposal.

It is acceptable to build a hotel in either of the two proposed locations that was faxed to this office on October 30, 1997 provided all of the following conditions listed below are met.

- 1. The impacted soil around MW-5 shall be excavated and taken off-site for proper disposal during the construction of the hotel. Confirmatory samples shall be taken from the walls and floor of the excavation.
- 2. A risk assessment shall be conducted for hotel residents based on the contaminants left in place after the excavation in the location of the new buildings.
- 3. The area under the buildings should be excavated to the maximum extent possible. Please note that this is in addition to the excavation near MW-5.
- 4. All abandoned piping shall be removed from the property, and soil samples taken every 20 feet for chemical analysis.
- 5. All monitoring wells shall be left in place, and not destroyed. Monitoring of the wells on a quarterly basis shall continue.
- 6. Construction of the building shall not commence until the chemical analyses of the samples has been reviewed and accepted by this office, and a risk assessment is completed.

If you have any questions, please contact me at 567-6774.

Sincerely,

Larry Seto Sr. Hazardous Materials Specialist

cc: Madhulla Logan, Environmental Health

HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

R0#313

March 27, 1997.

Mr. John C. Beery John Beery Organization 2900 Main Street, Ste 100 Alameda, CA 94501

STID 2945

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

NOTICE OF VIOLATION

Re: Submittal of quarterly groundwater monitoring reports for 2415 Mariner Square Drive, Alameda, California

Dear Mr. Beery,

Per the County's December 26, 1995, February 28, 1996, and February 21, 1997 letters to you, you are required to conduct quarterly groundwater monitoring at the above site. The last groundwater sampling event at the site was conducted in June 1996. Per the County's February 21, 1997 letter to you, this office requested that quarterly groundwater monitoring reports be submitted for the required September 1996 and December 1996 quarterly groundwater monitoring events by March 21, 1997. To date, these quarterly groundwater reports have not been submitted and we have received no correspondence on the status of these sampling events and report submittals. You are required to submit these reports within 30 days of the date of this letter.

Please be reminded that a groundwater monitoring event is due to occur at the site this month. A report documenting this sampling event should be submitted to this office within 45 days after completing field activities (~mid May 1997).

The above requirements are pursuant to Chapter 16, Division 3 of Title 23 California Code of Regulations. If you have any questions or comments, please contact me at (510)567-6763.

Sincerely,

Juliet Shin

Senior Hazardous Materials Specialist

Re: 2415 Mariner Square Dr.

March 27, 1997 Page 2 of 2

cc:

Cheryl Gordon

State Water Resources Control Board Division of Clean Water Programs

Underground Storage Tank Cleanup Fund Program

P.O. Box 944212

Sacramento, CA 94244-2120

Gary M. Pischke HydroEnvironmental Technologies, Inc. 2363 Mariner Square Drive, Ste 243 Alameda, CA 94501

Acting Chief

AGENCY DAVID J. KEARS, Agency Director



R0#313

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION (LOP)

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700 FAX (510) 337-9335

February 21, 1997

Mr. John C. Beery John Beery Organization 2900 Main Street, Ste 100 Alameda, CA 94501

STID 2945

Dear Mr. Beery,

Re: Investigations at 2415 Mariner Square Drive, Alameda, California

documenting the June 28, 1996 groundwater sampling event. Levels of Total Petroleum Hydrocarbons as gasoline (TPHg) and/or benzene increased in five of the monitoring wells since the last sampling event in August 1994. Additionally, there has been an increase in the thickness of Separate-Phase Hydrocarbons (SPH) identified in Well MW-6 since June 1994 from 0.02 feet to 0.2 feet. The highest concentration of TPHg recently identified at the site was 5,000 parts per billion (ppb) in Well MW-5, located only ~120 feet from the Oakland Inner Harbor (Harbor). Additionally, concentrations of TPHg at 980ppb were identified in groundwater even closer to the surface water in Well MW-2, which is located only 20 to 25 feet from the Harbor. According to the S.F. Bay Region-Regional Water Quality Control Board's (RWQCB) Board Order 95-136, which established cleanup values for groundwater adjacent to surface waters for the San Francisco International Airport, the toxic threshold value of TPHg for aquatic organisms is 100ppb. The concentrations of TPHg at the site are currently 10 to 50 times greater than this protective threshold value.

This office has reviewed the recently submitted quarterly groundwater monitoring report

Based on the fact that contaminant concentrations appear to be increasing at the site and that TPHg values on site have exceeded the RWQCB's benchmark toxic threshold values for aquatic organisms, quarterly groundwater monitoring must be implemented at the site. Additionally, concentrations of some of the PNAs identified at the site exceed some of RWQCB's water quality objectives. Long term monitoring, and possibly additional characterization and/or containment measures, may be necessary in the future to guarantee that the elevated levels of TPH in Wells MW-2 and MW-5, as well as the increasing concentrations in and around the former tank farm, will not impact the Harbor. Extensive amounts of very elevated concentrations of Total Recoverable Petroleum Hydrocarbons (TRPH) were identified in shallow soils (3- to 4-feet below ground surface(bgs)) within the tank farm during the April 1992 investigations. On-going leaching of this contamination into groundwater is possible even with the current cap over this soil, based on increasing contaminant concentrations in Well MW-9. This tank farm is not completely surrounded by the firewall which allows for potential migration of groundwater contamination from this tank farm into the Harbor. Even if the firewall were

Mr. John Beery Re: 2415 Mariner Square Drive February 21, 1997 Page 2 of 4

to surround the whole tank farm, there would be no guarantee that this firewall would remain structurally sound enough in the future to contain the plume.

An ecological risk assessment may also be needed if it is eventually determined that the groundwater contaminant plume may be migrating into the Harbor. Although the RWQCB is currently working on establishing aquatic threshold values for other forms of TPH, such as motor oil, lubricating oil, Bunker C, etc., RWQCB representatives have stated that Responsible Parties with sites having potentially harmful levels of groundwater contaminants migrating into surface waters should conduct their own site-specific ecological risk assessment to determine protective cleanup values for the constituents of concern. Per my conversation with James Nusrala, RWQCB, his office will be requiring the adjacent Navy Annex property to conduct a detailed ecological risk assessment for the contaminants currently being identified at their site.

Although analysis of soil samples collected from the former tank farm area only identified motor oil, lubricating oil, and Bunker C, increasing levels of TPHg in groundwater samples collected from Well MW-9 and other site wells suggests that operations of the former tank farm may have involved TPHg as well. Based on the fact that the highest concentrations of TPHg have been detected from wells located immediately adjacent to the abandoned underground piping, this office needs answers to the following questions on the piping to determine whether this could be a potential on-going source of the observed groundwater contamination: 1) Is the abandoned piping still in place; 2) Was this piping capped; 3) Was this piping rinsed before abandonment; 4) What exactly was this piping used for; 5) Does this piping lead directly out to the Harbor; 6) What is the makeup and dimensions of the trench for this piping? If concentrations continue to increase in the area of the abandoned piping, we may need to consider the piping as a potential source which needs to be mitigated. Please submit the above information on the abandoned underground piping, and any information you may have on the former uses of the former tank farm, to this office with the next quarterly groundwater monitoring report.

To date, the contaminant concentrations in Wells MW-1 and MW-8, located outside of the concrete walls placed on the east side of the site in conjuntion with the installation of the Webster Tube, have been very low. This suggests that the concrete walls are effectively preventing migration of the contaminant plume directly towards the Webster Tube. However, the extent of the concrete wall is limited to the south, and appears to end before reaching Well MW-7. Based on the groundwater gradient information, the limited extent of the concrete wall, and the concentrations identified in Wells MW-1, MW-8, and MW-7, it appears that the contaminant plume from the southern half of the site is being funneled towards MW-7, rather

Mr. John Beery Re: 2415 Mariner Square Drive February 21, 1997 Page 3 of 4

than Wells MW-1 and MW-8, along this concrete wall. Well MW-7 should be watched closely to see whether contaminant concentrations continue to increase in this well, which would indicate plume migration onto the adjacent property to the south.

On December 15, 1995, you submitted a letter to this office in response to the County's September 28, 1995 letter requesting you to remove the two inactive petroleum underground storage tanks (USTs) from your site and to indicate where the storm drain piping trench(es) lie(s) on your site. You responded by stating that the two USTs would be removed some time in 1996 "as part of remediation measures taken on the property". To date, these two USTs have not been removed, and no remediation has yet been requested by this office. Per the Alameda County Fire Code, Section 79.114(e), and Article 7, Title 23 California Code of Regulations, petroleum USTs are required to be removed within 90 days after discontinuation of its use. According to your letter, these tanks have not been used since 1971. You are currently in violation of the above regulations. This office is requesting that these USTs be removed within 60 days of the date of this letter (i.e., by April 18, 1997). Please be reminded that permits must be obtained from the County and the Alameda Fire Department prior to implementing the tank removals.

Although you submitted a site map showing the locations of storm drain inlets with your December 15, 1996 letter, you did not depict the storm drain piping trench location(s) that this office had requested. The exact location or path of the storm drain piping trench, as well as its depth, are needed to determine whether the trench may be acting as a preferential flow path for the groundwater contaminant plume. Please submit a diagram showing the location(s) of the trench(es) with the next quarterly groundwater monitoring report.

Based on the quarterly groundwater monitoring requirements, groundwater monitoring should have been conducted in September 1996, December 1996, and one should be due to take place in March 1996. The last quarterly sampling event submitted to this office only documented the sampling on June 28, 1996. The third and fourth quarter 1996 monitoring reports are currently overdue to this office. Please submit these reports within 30 days of the date of this letter (i.e., by March 21, 1997).

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely.

Juliet Shin

Senior Hazardous Materials Specialist

Mr. John Beery Re: 2415 Mariner Square Drive February 21, 1997 Page 4 of 4

cc: Cheryl Gordon

State Water Resources Control Board Division of Clean Water Programs Underground Storage Tank Cleanup Fund Program P.O. Box 944212

Sacramento, CA 94244-2120

Gary M. Pischke Hydro Environmental Technologies, Inc. 2363 Mariner Square Drive, Ste 243 Alameda, CA 94501

Acting Chief

AGENCY

DAVID J. KEARS, Agency Director



RO# 313 RAFAT A. SHAHID, DIRECTOR

February 28, 1996

Mr. John Beery Mariner Square 2415 Mariner Square Drive Alameda, CA 94501

STID 2945

Re: Investigations at 2415 Mariner Square Drive, Alameda, California

Dear Mr. Beery,

DEPARTMENT OF ENVIRONMENTAL HEALTH 1131 Harbor Bay Parkway Alameda, CA 94502-6577 (510)567-6700

This office has reviewed HydroEnvironmental Technologies' February 8, 1996 letter, which was written in response to the County's December 26, 1995 letter and our discussions in the December 21, 1995 meeting. This office still needs information documenting your statements that the site's firewall fully surrounds the former aboveground storage tank farm, extends well beneath the water table, and is in good enough condition to contain the observed groundwater contaminant plume within this area. This office is concerned that the elevated levels of soil contamination observed in this area will continue to leach into the groundwater and may eventually leak through the firewalls, impacting the Bay or off-site properties. If groundwater contaminant levels within the tank farm, or outside of the tank farm, consistently increase, the anticipated period of groundwater monitoring will need to be extended to assure that these levels are not leaking through the firewalls and/or migrating off site. On the otherhand, as stated in the County's December 26, 1995 letter, if contaminant concentrations consistently attenuate in the groundwater at the site, the monitoring frequency may be decreased and the site may eventually be granted closure.

Additionally, as discussed in the December 21, 1995 meeting, please submit better documentation for the construction and depths of the sheet piles surrounding your site (e.g., are there any gaps between the individual sheet piles, etc.). This is to assure that the groundwater contamination being observed at the northern and western perimeter of your site is not infiltrating the Bay.

As stated in the County's December 26, 1995 letter, quarterly groundwater monitoring and gradient determinations shall continue at the site. Due to the sheetpile walls which surround the majority of the site, the groundwater gradient inside and outside of this sheet pile area may be different. Therefore, this office is requesting that only the wells within the sheetpile area be used to determine the groundwater gradient at the site. However, special attention should also be given to the behavior of water levels observed in Wells MW-1 and MW-8, located outside of the sheetpile area.

Mr. John Beery Re: 2415 Mariner Square Dr. February 28, 1996 Page 2 of 2

Fairly recent studies have shown that Polynuclear Aromatic Hydrocarbons (PNAs) can be the most volatile and toxic constituents contained within TPHd. Therefore, PNAs are considered to be the constituents that drive the risk in TPHd. Consequently, future groundwater samples shall be analyzed for PNAs, in addition to TPHg, TPHd, TPHmo, BTEX, and vinyl chloride. If substantial PNA concentrations are identified in the groundwater, additional soil samples may need to be collected at the site and analyzed for PNAs to identify any potential human health threat.

As stated in the December 25, 1996 letter, the next round of quarterly groundwater sampling is due to take place before March 1, 1996. A report documenting the sampling event shall be submitted to this office by April 1, 1996.

Please submit the information on the construction of the firewall and sheetpiles within 30 days of the date of this letter.

If you have any questions or comments, please feel free to contact me at (510) 567-6763.

Sincerely,

Juliet Shin

Senior Hazardous Materials Specialist

cc:

Gary Pischke

HydroEnvironmental Technologies, Inc. 2363 Mariner Square Drive, Ste 243

Alameda, CA 94501

Ronald W. Doll 2236 Mariner Square Drive, Ste 202 Alameda, CA 94501

Acting Chief-File

HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0313

ARNOLD PERKINS, DIRECTOR RAFAT A. SHAHID, DEPUTY DIRECTOR

Alameda County CC4580 Environmental Protection Division 1131 Harbor Bay Parkway, Room 250 Alameda CA 94502-6577

December 26, 1995

Mr. John Beery Mariner Square 2415 Mariner Square Drive Alameda, CA 94501

STID 2945

Re: Investigations at 2415 Mariner Square Drive, Alameda, CA

Dear Mr. Beery,

Per our meeting on December 21, 1995, quarterly groundwater monitoring and gradient determinations should be conducted out at the site for a minimum of one year to delineate the plume and assure that migration is not occurring off site or in to the Bay. Special attention should also be placed on observing the difference in gradient flow inside and outside of the sheetpile walls surrounding the site (i.e., compare gradient in Wells MW-1 and MW-8, located outside of the sheetpiles, to the gradients from the other wells). At the end of the one year period, this office shall review the sampling data and determine whether the frequency of monitoring may be switched from quarterly to semi-annual. If substantial off-site migration is occurring, additional wells may be needed to further characterize the plume. Additionally, if the Bay is being impacted, measures may need to be taken to prevent future impact to the Bay.

Per the meeting, roughly 99 % of the site is paved, with the only area of exposed soil being located in a landscaped area with no possible foot traffic. Therefore, regardless of the elevated levels of lead and Total Recoverable Petroleum Hydrocarbons (TRPH) identified in surficial soils, there currently appears to be no human health threat through ingestion, dermal, or inhalation pathways. Additionally, per the American Standard Testing Methods' (ASTM) Risk Based Corrective Action guidelines, there currently appears to be no threat of impact to human health by contaminant vapors.

Groundwater samples shall be analyzed for TPHg, TPHd, TPHmo, BTEX, and vinyl chloride. Additionally, per out meeting, Well MW-2 shall be analyzed for Freon in the next sampling event. If Freon levels appear to have increased from the last sampling event, you will be required to continue analysis for Freon for Well MW-2. After two to three years of consistent monitoring, the site might be considered for closure if the following apply:

o It is shown that the contaminant plume is not migrating into the Bay, or significantly off site on to adjacent properties;

John Beery

Re: 2415 Mariner Square Drive

December 26, 1995

Page 2 of 3

- o Levels of benzene and vinyl chloride, which are human carcinogens, significantly attenuate in the groundwater;
- o There is evidence to indicate that bioattenuation is occurring for all the contaminant constituents at the site; and
- o Enough information is gathered regarding the groundwater gradient and potential tidal influence to establish a definite groundwater gradient pattern.

If all the above requirements are not met, continued groundwater monitoring will be required. The frequency would depend on the status of attenuation, migration, uncertainties regarding the groundwater gradient flow, etc. If the site does meet all the above requirements, the site may be considered for a conditional closure or a standard closure, depending on the extent and/or severity of the contaminant plume still in place.

Although elevated levels of Total Recoverable Petroleum Hydrocarbons (TRPH) were identified in soil samples throughout the former Above Ground Storage Tank Farm area, it appears that this soil contamination, as well as the impacted groundwater beneath this area, may be adequately contained due to a firewall surrounding the whole area. Per our meeting, the firewall extends far beneath the water table. Please submit additional documentation confirming the depth of the firewall, so that this office can be sure that no excavation will need to be conducted in this area to prevent future groundwater impact.

Lastly, please submit more information on the following:

- The extent of the sheet pile walls surrounding the site and specify how far it extends on to the Navy property. Also provide information on what type of barriers there are between the groundwater and the Bay, if any, on the Navy property.
- o Provide information on any tidal studies that have been conducted out at the site. If no adequate tidal studies have been conducted, you will be required to implement a tidal study.

The next quarterly groundwater monitoring event should be conducted within 60 days of the date of this letter. Additionally, per the meeting, the removal of tanks T-1 and T-2 is planned for early 1996.

John Beery

Re: 2415 Mariner Square Drive

December 26, 1995

Page 3 of 3

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin

Senior Hazardous Materials Specialist

cc:

Ronald W. Doll

2236 Mariner Square Drive, Ste 202

Alameda, CA 94501

Gary M. Pischke

Hydro Environmental Technologies 2363 Mariner Square Drive, Ste 243

Alameda, CA 94501

Acting Chief-File

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DAVID J. KEARS, Agency Director





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RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Parkway Alameda, CA 94502-6577

(510) 567-6777

September 28, 1995

Mr. John Beery Mariner Square 2415 Mariner Square Drive Alameda, CA 94501

STID 2945

Re: Investigations at 2415 Mariner Square Drive, Alameda, CA

Dear Mr. Beery,

This office has reviewed McLaren Hart's Supplemental Site Investigation Report, dated August 2, 1995, for the above site. Elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg), TPH as diesel (TPHd), TPH as motor oil (TPHmo), and benzene, toluene, ethylbenzene, and xylenes (BTEX) were identified in soil and groundwater samples collected from this phase of investigations, in addition to past site investigations. Per the results of the investigations, it appears that the TPHg and TPHd concentrations are resulting, at least in part, from onsite activities. According to the sample results from the neighboring Navy property, "detected concentrations of TPHg and TPHd in soil samples indicated that the highest concentrations were encountered at a depth of approximately 3.5 to 5.5 feet below grade in borings drilled near the property line (near the Mariner Square site's former above ground steel storage tank)." At this time, it is difficult to determine whether the TPHmo and vinyl chloride contamination is resulting from the Navy site, the Mariner Square site, or from both sites.

This office is requesting that quarterly monitoring continue at the site, and that future groundwater samples be analyzed for TPHg, TPHd, TPHmo, BTEX, and vinyl chloride. Additionally, quarterly water level measurements and corresponding groundwater gradient determinations shall be conducted.

In addition to the above sampling requirements, this office is requesting that you respond to the following questions the County has on the investigations:

o Were tanks T-1 and T-2 removed? If not, when are you planning to remove these tanks? What was historically stored in these tanks?

Re: 2415 Mariner Square

September 28, 1995

Page 2 of 3

- o How deep are the sheet piles that surround the site to the north, east, and southeast? Wouldn't these sheet piles restrict the flow of groundwater towards the Webster Tube? Was groundwater gradient calculated using only the wells within the sheet pile area to determine whether the gradient varies within the sheet pile area as opposed to outside the sheet pile area?
- o Although the report suggests that pumping 1,200 gallons of water per day from the Webster Street Tube would not be the cause of the significant "drawdown" observed in Well MW-1, wouldn't it depend on the rate at which they pumped this water (e.g., pumping 1,200 gallons within 1 hour as opposed to pumping throughout the whole day in short intervals)?
- o The report states that one sample from 2-feet below ground surface in boring SB-C identified medium and high-boiling hydrocarbons, along with halogenated and/or highly oxidized compounds. Which constituents, specifically, is the report referring to? The lab analysis results for SB-C could not be located within our copy of the report. Please submit a copy to this office.
- o Although filtered groundwater samples did not identify significant concentrations of heavy metals, elevated levels were identified in shallow soils at the site (between 1.5-and 2-feet below ground surface). The elevated levels of metals in the shallow soils may pose a potential threat to human health on site. This office is requesting more information on what portion of the site is paved or covered with buildings. If there are areas of the site with accessible metal contamination in soil, further information needs to be provided to insure that this soil will not pose a human health threat to the public.
- o Per the report, a Total Organic Carbon (TOC) analysis was conducted on soil samples collected at both shallow and deeper depths at the site. Does TOC analysis pick up on any biogenic materials? The higher TOC concentrations observed at the shallower depths appear to be resulting from surface spills, and not from the flushing out of carbon at depth due to fluctuating groundwater elevations, which generally results in a more uniform soil concentration throughout the capillary zone, or due to bioremediation, because shallower soils would be expected to have lower concentrations, rather than higher concentrations, due to the greater availability of oxygen.

Re: 2415 Mariner Square

September 28, 1995

Page 3 of 3

o Page 2-6 of the report mentions the possiblity of storm sewers being located at the site. Where are these storm sewers located and at what depth?

As requested above, please resume quarterly groundwater monitoring and submit a response to the above questions to the County within 45 days of the date of this letter.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin

Senior Hazardous Materials Specialist

cc: Saulius Germanas

McLaren/Hart Environmental Engineering

1135 Atlantic Ave. Alameda, CA 94501

Acting Chief-File

K0313

RAFAT A. SHAHID, Assistant Agency Director

June 23, 1995

Mr. John Beery Mariner Square 2415 Mariner Square Drive Alameda, CA 94501 ALAMEDA COUNTY-ENV. HEALTH DEPT. ENVIRONMENTAL PROTECTION DIV. 1131 HARBOR BAY PKWY., #250 ALAMEDA CA 94502-6577 (510)567-6700

STID 2945

Re:

Investigations at 2415 Mariner Square Drive, Alameda, California

NOTICE OF VIOLATION

Dear Mr. Beery,

In July 1994, a work plan was submitted to this office proposing further investigations at the above site. On August 10, 1994, this office sent you a letter stating that the work plan was acceptable with some additional requirements (refer to attached copy of letter). Following additional correspondence between the County and McLaren Hart, the County sent a letter to you on September 13, 1994 stating that the amended work plan was acceptable to this office (refer to attached copies of McLaren Hart's August 26, 1994 letter, the County's September 2, 1994 letter, and McLaren Hart's September 8, 1994 letter).

Per the amended work plan, the work should have been implemented by October 1994, and a report documenting field activities should have been submitted to this office by November 1994. To this date, this office has not received this report. Additionally, per the County's August 10, 1994 letter, you were requested to submit copies of All West's reports, dated December 3, 1991 and May 1992. To this date this office has not received copies of either of these reports.

You are required to submit the report documenting field work and copies of the All West reports within 45 days of the date of this letter. Any extensions for the submittal of these documents must be approved by this office.

Lastly, it is the understanding of this office that there are two inactive diesel underground storage tanks (USTs) located on your site. Per Alameda County Fire Code, Section 79.114(e), all USTs are required to be removed within 90 days of not being in service. According to our records, the two USTs on your site have been out of service for over 90 days. This office is requesting that you remove these two USTs within 90 days of the date of this letter. As part of the removal process, you are

Re: 2415 Mariner Square Drive

June 23, 1995 Page 2 of 2

required to complete the County's UST Closure Plan documents, submit them to the County for approval, and notify the County and the Fire Department at least 48 hours in advance of the UST removals so that agency representatives may be present to witness the removal.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin

Senior Hazardous Materials Specialist

ATTACHMENTS

cc:

Saul Germanas McLaren Hart

1135 Atlantic Ave. Alameda, CA 94501

Gil Jensen, Alameda County District Attorney's Office

File

RAFAT A. SHAHID, Assistant Agency Director

ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director

September 13, 1994

Mr. John Beery Mariner Square 2415 Mariner Square Drive Alameda, CA 94501 ALAMEDA COUNTY 430-453
HEALTH CARE SERVICES
DEPT. OF ENVIRONMENTAL HEALTH
1131 HARBOR BAY PKWY 2ND FLOOR
ALAMEDA CA 94502-6577

STID 2945

Re: Addendum to work plan at 2415 Mariner Square Drive, Alameda

Dear Mr. Beery,

This office has reviewed McLaren Hart's addendum, dated September 8, 1994, to the recently submitted work plan. This addendum is acceptable to this office. Per my conversation with Saul Germanas, McLaren Hart, on September 13, 1994, it is the understanding of this office that the proposed Well MW-8 will be relocated from the CalTrans property, 100 feet downgradient of the tank farm, to on site, 80 feet downgradient of the tank farm. This relocation of Well MW-8 is acceptable to this office.

Lastly, it is the understanding of this office that field work is scheduled to begin at the site on September 15, 1994. Please notify this office if there are any changes to the Proposed Project Schedule.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely

Juliet Shin

Hazardous Materials Specialist

cc:

Saul Germanas McLaren Hart

1135 Atlantic Ave. Alameda, CA 94501

Edgar Howell

RAFAT A. SHAHID, Assistant Agency Director

ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director

September 2, 1994

Mr. John Beery Mariner Square 2415 Mariner Square Drive Alameda, CA 94501 ALAMEDA COUNTY 430-453
HEALTH CARE SERVICES
DEPT. OF ENVIRONMENTAL HEALTH
1131 HARBOR BAY PKWY 2ND FLOOR
ALAMEDA CA 94502-6577

STID 2945

Re: Work plan for investigations at 2415 Mariner Square Drive, Alameda, California

Dear Mr. Beery,

This office has reviewed McLaren Hart's (McLaren) response to the County's August 10, 1994 requirements for the July 21, 1994 work plan. The following are the County's responses to McLaren's letter:

o "......[The County] agreed that providing copies of reports generated as part of the Navy-Clean program underway at the [neighboring] site would satisfy your request for upgradient investigations....."

Although the County did require further investigations to the west of MW-6 and MW-4, the County did not state, necessarily, that information on the Navy-Clean investigations would satisfy our request. Per my conversation with Saul Germanas, McLaren, on August 10, 1994, Mr. Germanas expressed concern that it would be difficult to distinguish the Navy's contaminant plume from the site's plume, if they were to collect samples from the Navy site. I stated that they would have to determine, through researching the Navy-Clean files, whether the Navy even had any contaminant problems along that portion of their site. If there was no known plume in that area of the Navy site, then there would be no problem discerning Mariner site's plume. Additionally, I suggested that if the Navy did have some contaminant concerns near the Mariner site boundary, then further investigations could be conducted, through fuel fingerprinting, observation of concentration attenuation, etc., to determine the source of or contributors to the observed contamination on the Navy site. If the Navy happened to have already installed monitoring wells along that portion of their property, then you could monitor these wells, in conjunction with the Navy, to determine the extent of Mariner site's contaminant plume.

As stated in the County's August 10, 1994 letter, you are required to delineate the extent of the ground water

Re: 2415 Mariner Square

September 2, 1994

Page 2 of 2

contaminant plume to the north/northwest of Well MW-6, where elevated levels and floating product have been identified, and northwest of MW-4, which has identified the highest levels of benzene concentrations at the site. Although the proposed phase of work may be implemented, you will be required to address the delineation of this contaminant plume immediately following the proposed phase of work. The timetable submitted with McLaren's August 26, 1994 letter shall be revised to include this work.

o "A thin layer of free-phase floating product was observed in Well MW-6...We suggest that the implementation of an interim remedial measure be postponed for a short period of time until the extent of free product is better understood....."

Response: Based on the requirements of Section 2722, Article 11, Title 23 California Code of Regulations for interim remediation, and the fact that "a thin layer" of floating product has been observed in Well MW-6, it appears that, at a minimum, a passive recovery system could be employed at this well, at this time, in conjunction with the proposed investigations. The implementation of a passive product recovery system.does not appear to be time consuming or complicated enough that it would disrupt the progress of the proposed phase of work.

The above comments shall be addressed prior to the implementation of the work plan. If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Saul Germanas

McLaren/Hart Environmental Engineering 1135 Atlantic Ave.

Alameda, CA 94501

Ronald W. Doll P.O. Box 4717

Walnut Creek, CA 94596

Edgar Howell

RAFAT A. SHAHID, Assistant Agency Director

ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director

August 10, 1994

Mr. John Beery Mariner Square 2415 Mariner Square Drive Alameda, CA 94501 Alameda County CC 4580 Health Care Services Agency Dept. Of Environmental Health 1131 Harbor Bay Pkwy 2nd Flr. Alameda, CA 94502-6577

STID 2945

Re: Work plan for investigations at 2415 Mariner Square Drive, Alameda, California

Dear Mr. Beery,

This office has reviewed McLaren/Hart's workplan, dated July 21, 1994. The work plan is acceptable with the following additional requirements/reminders:

- o Per Article 11 Title 23 California Code of Regulations, you are required to delineate the extent and severity of soil The work plan and ground water contamination at the site. did not address the delineation of the ground water contaminant plume to the north/northwest of Well MW-6, where elevated levels and floating product have been identified, nor northwest of Well MW-4, which has identified the highest levels of benzene concentrations (benzene is a known carcinogen). Although the proposed phase of work may be implemented, you will be required to address the delineation of the contaminant plume in these directions, immediately following the proposed phase of A timetable addressing the proposed work, the delineation of the plume, and any additional anticipated work shall be submitted to this office before work begins at the site.
- o The timetable shall also incorporate the time needed to obtain an encroachment permit from CALTRANS to install Well MW-8. The installation of this well is vital in determining the downgradient extent of the contaminant plume and whether this plume is being drawn into the dewatering system of the Webster Tube.
- o This office has no information as to what the two existing underground storage tanks (USTs) stored in the past.

 Please provide all information on the historical uses of the USTs. It is the understanding of this office that soil samples collected from the two borings placed adjacent to the USTs will be analyzed for TPH (modified 8015) and BTEX.

Re: 2415 Mariner Square

August 10, 1994 Page 2 of 3

Additional analysis may be required subject to the historical uses of these USTs.

- o Elevated levels of hydrocarbons and floating product have been identified in Well MW-6. Per Section 2722, Article 11 Title 23 California Code of Regulations, interim remediation measures are required when floating product is encountered at the site. Therefore, you are required to submit an addendum to the work plan proposing interim remedial measures for floating product removal. As stated above, the extent of this floating product and elevated levels identified in Well MW-6 will need to be delineated in the next phase of work.
- o Please be reminded that the proposed wells must screen across the shallowest historical water table. Our files indicate that the shallowest water table at the site was 4.43 feet below ground surface in August 1992.
- o A minimum of one soil sample from each of the proposed monitoring well locations shall be submitted to a certified laboratory for analysis. Please be reminded to wait a minimum of 24 hours after developing these proposed wells before collecting samples.
- o This office does not have copies of All West's Reports, dated December 3, 1991 and May 1992. Please submit copies of these reports within 30 days of the date of this letter. Presumably, these reports address the placement and sampling of borings MS-1 through MS-23. If not, please submit all information pertaining to this work.
- o Additionally, this office needs the documentation for the disposal of excavated soil to a Class III landfill in February 1991. Please submit this information with copies of All West's Reports.
- o Lastly, please provide more information on the fate of water pumped at the Webster Tube for dewatering.

All additional information, requested above, shall be submitted to this office within 30 days of the date of this letter. All above requirements shall be addressed prior to implementation of the work plan. If you have any questions or comments, please contact me at (510) 567-6763.

Re: 2415 Mariner Square

August 10, 1994

Page 3 of 3

Sincerely,

Juliet Shin Hazardous Materials Specialist

cc:

Saul Germanas

McLaren/Hart Environmental Engineering

1135 Atlantic Ave. Alameda, CA 94501

Ronald W. Doll P.O. Box 4717

Walnut Creek, CA 94596

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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0313

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

July 13, 1994

Mr. John Beery Mariner Square 2415 Mariner Square Drive Alameda, CA 94501

STID 2945

Re:

Investigations at 2415 Mariner Square Drive, Alameda,

California

Dear Mr. Beery,

Per my conversations with you on May 11, 1994 and July 13, 1994, it is the understanding of this office that a work plan has been prepared for further investigations and remediation at the above site. Per our conversation on July 13, 1994, you stated that McLaren Hart consultants have been retained to prepare and implement the work plan before the end of July 1994. This office has not yet received a copy of this work plan, and this work plan should be reviewed by this office before it is implemented. Please submit a copy of this work plan within 15 days of the date of this letter.

Lastly, according to our files, the last quarterly ground water sampling event to be conducted out at the site was on May 25, 1993. Per Article 5 Title 23 California Code of Regulations, you are required to conduct ground water monitoring and reporting on a quarterly basis. At this time, you are delinquent in conducting ground water sampling by over one year. You are required to conduct the next ground water sampling event within 45 days of the date of this letter.

This is a formal request for a technical report, per Section 2722(c)(d) Title 23 California Code of Regulations. Any requests for extensions, or modifications of required tasks, must be submitted to and approved by this agency in writing.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin

Hazardous Materials Specialist

Mr. John Beery Re: 2415 Mariner Square July 13, 1994 Page 2 of 2

Ronald W. Doll cc: P.O. Box 4717

Walnut Creek, CA 94596

Gil Jensen, Alameda County District Attorney's Office

DAVID J. KEARS, Agency Director

R0313

(510) 271-4530

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

December 23, 1993

Mr. John Beery Mariner Square 2415 Mariner Square Drive Alameda, CA 94501

STID 2945

Re:

Investigations at 2415 Mariner Square Drive, Alameda, California

Dear Mr. Beery,

This office has received Subsurface Consultants' ground water sampling results for the samples collected in May 1993, and the lead analysis results for the soil samples. Quarterly ground water monitoring is required to continue at the site, and you are currently delinquent in conducting the last two required quarterly monitoring events, that were due to occur in August 1993 and November 1993. You are required to resume quarterly ground water monitoring within 30 days of the date of letter.

The most recently submitted quarterly monitoring report was missing water level measurements and a corresponding elevation contour map. This information is required to be included in all future quarterly monitoring reports.

The lead analysis results identified Soluble Threshold Limit Concentrations (STLCs) exceeding the allowable levels of 5,000 Therefore, you are required to continue analyzing all ground water samples collected from the site for lead.

Lastly, the most recent quarterly monitoring report included the lab analysis results for ground water samples collected from Well However, our files do not contain any information documenting the existence of this well on the site. Please submit any information you have on Well MW-6 to this office within 15 days of the date of this letter.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely

Juliet Shin

Hazardous Materials Specialist

Re: 2415 Mariner Square Drive

December 23, 1993

Page 2 of 3

cc: Ronald W. Doll Attorney at Law P.O. Box 4717

Walnut Creek, CA 94596

Bill Rudolph

Subsurface Consultants, Inc.

171 12th Street, Ste 201

Oakland, CA 94607

R0313

Oakland, CA 94621

(510) 271-4530

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

November 1, 1993

DAVID J. KEARS, Agency Director

Mr. John Beery Mariner Square 2415 Mariner Square Drive Alameda, CA 94501

STID 2945

Investigations at 2415 Mariner Square Drive, Alameda RE:

Dear Mr. Beery,

Per a conversation between Mr. Ronald W. Doll and myself on October 29, 1993, the site is in the midst of litigation to determine which parties will partipate in the next stage of investigations at the site. According to Mr. Doll, the above In the meantime, will be determined in approximately 30 days. per Section 2652(d), Article 5, Title 23 California Code of Regulations, you are required to continue quarterly ground water monitoring and reporting of the on-site wells. You are currently delinquent in the submittal of quarterly ground water monitoring reports, even though this office has already granted you a number of extensions in the past for the submittal of these reports.

The next quarterly ground water monitoring report will be due to this office within 30 days of the date of this letter. The referenced quarterly reports must describe the status of the investigations and must include, among others, the following elements:

- Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- Status of ground water contamination characterization
- Interpretations of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.
- Recommendations or plans for additional investigation work or remediation, if required.

Re: 2415 Mariner Square

November 1, 1993 Page 2 of 2

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin

Hazardous Materials Specialist

Ronald W. Doll cc:

Attorney at Law

1050 Springfield Dr.

Walnut Creek, CA 94598

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0313

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

DAVID J. KEARS, Agency Director

April 28, 1993

Mr. John Beery Mariner Square 2415 Mariner Square Drive Alameda, CA 94501

STID 2945

Investigations at 2415 Mariner Square Drive, Alameda Re:

Dear Mr. Beery,

Per our conversation on April 28, 1993, your request for an extension of the reinstatement of quarterly monitoring to the first week of July 1993 is acceptable to this office. A quarterly report documenting this quarterly sampling event shall be submitted to this office within 30 days after field work. Subsequent sampling and reporting shall be conducted quarterly until this site qualifies for RWQCB "sign-off".

Lastly, this office sent you a letter, dated November 24, 1992, stating that it appeared there were two inactive underground storage tanks currently at the site. This office never received any response from you to confirm this information. If, in fact, you have inactive underground storage tanks at your site, you are required to remove them in compliance with the regulations and guidelines set by the State.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin

Hazardous Materials Specialist

Richard Hiett, RWQCB cc:

> Bill Rudolph Subsurface Consultants, Inc. 171 12th St., Ste 201 Oakland, CA 94607

DAVID J. KEARS, Agency Director

R0313

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

April 1, 1993

Mr. John Beery Mariner Square 2415 Mariner Square Dr. Alameda, CA 94501

STID 2945

Re:

The reinstatement of quarterly ground water monitoring at the Mariner Square Boat Yard, located at 2415 Mariner Square Drive, Alameda, California

Dear Mr. Beery,

Per an earlier agreement in February 1993, the due date for the required January 1993 quarterly sampling event was extended to March 31, 1993. Consequently, you are required to reinstate quarterly ground water monitoring at the site within 15 days of the date of this letter.

Please notify me 48 hours prior to collecting the ground water samples. If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely

Juliet Shin

Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Bill Rudolph Subsurface Consultants, Inc. 171 12th St., Ste 201 Oakland, CA 94607

R0313

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

November 24, 1992

Ronald W. Doll Attorney at Law 1050 Springfield Dr. Walnut Creek, CA 94598 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

STID 2945

RE: Investigations at the Mariner Square Boat Yard, located at 2415 Mariner Square Drive, Alameda, California

Dear Mr. Doll.

This office has received and reviewed Subsurface Consultant's Ground Water Investigation Report, dated November 13, 1992, for the above site. In a letter dated July 8, 1992, the County requested that the site conduct Soluble Threshold Limit Concentrations (STLC) analysis for lead on soil samples collected from the monitoring wells. However, it appears that this analysis was not conducted. You are required to collect additional soil samples and conduct STLC analysis on them for lead. Please submit a brief work plan, within 45 days of the receipt of this letter, addressing this work.

Currently, the analysis of ground water samples include Total Extractable Hydrocarbons (TEH) and Total Recoverable Hydrocarbons (TRPH). The analysis for TRPH is not required. However, you are required to include the analysis for Total Petroleum Hydrocarbons as gasoline (TPHg) in ground water samples. Additionally, please be reminded that ground water samples should continue to be analyzed quarterly for Volatile Organic Compounds (VOCs), Total Oil and Grease (TOG), and benzene, toluene, xylenes, and ethylbenzene, in addition to TEH and TPHg.

Additionally, it appears that the contaminated ground water may be leaving the site and heading towards the storm and sanitary sewer lines and the Webster Tube. Additional investigations are required to develop more accurate ground water elevation contours to determine whether the gradient is actually sloping fairly sharply towards the southeast between Wells MW-4 and MW-1. If ground water contamination is migrating off site, efforts will need to be made to contain the contaminant plume.

It appears that the two inactive underground storage tanks (USTs) currently at the site contain oil and water. Please be advised that these USTs are required to be removed with the submittal of closure permits to the County.

Mr. Ronald Doll

Re: 2415 Mariner Square

November 24, 1992

Page 2 of 2

Lastly, extensive soil contamination was identified at the site at 4.5 feet below ground surface. Please be advised that you are required to eventually submit a work plan for the remediation of both the soil and ground water contamination resulting from the site, per Section 2725(b), Article 11, Title 23 California Code of Regulations.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Sean O. Carson Subsurface Consultants, Inc. 171-12th Street, Ste 201 Oakland, CA 94607



ter Resources Control Board Division of Clean Water Programs UST Local Oversight Program

Hazardous Materials Division

80 Swan Way, Rm. 200. Oakland, CA 94621

(510) 271-4530

R0313

DEPARTMENT OF ENVIRONMENTAL HEALTH

RAFAT A. SHAHID, Assistant Agency Director

July 8, 1992

Ronald W. Doll Attorney at Law 1050 Springfield Dr. Walnut Creek, CA 94598

AGENCY

STID 2945

Investigations at the Mariner Square Boat Yard, located at RE: 2415 Mariner Square Drive, Alameda, California

Dear Mr. Doll,

Per the conversation between Ms. Juliet Shin, Alameda County Hazardous Materials Specialist, and Sean Carson, consultant, monitoring wells will be installed at the above site during the week of the 20th of July 1992.

Please be reminded that the Regional Water Quality Control Board's (RWQCB) guidelines state that a ground water monitoring well must be installed within 10 feet of the former UST in the verified downgradient direction. If adequate ground water gradient information is not available from neighboring sites, two additional monitoring wells must be installed at the site in order to complete the triangulation necessary to determine the ground water gradient behavior beneath the site.

Subsequent to the installation of the monitoring well(s), the well(s) must be surveyed to an established benchmark with an accuracy of 0.01 foot. Ground water samples are to be collected and analyzed quarterly, along with water level measurements. great variations in the ground water gradient are observed in the initial quarters, you may be required to begin monthly water level measurements until accurate ground water gradient behavior is determined.

Initial soil and ground water samples shall be analyzed for Total Petroleum Hydrocarbons as gasoline, TPH as diesel, benzene, toluene, xylenes, and ethylbenzene, and Total Oil and Grease. Additionally, due to the high concentrations of lead identified from sidewall soil samples (at 150 ppm), you will be required to conduct Soluble Threshold Limit Concentration (STLC) analysis on the initial soil samples collected.

A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for final RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter.

Ronald W. Doll

Re: 2415 Mariner Square Dr.

July 8, 1992 Page 2 of 2

The referenced initial and quarterly reports must describe the status of the investigation and must include, among others, the following elements:

- o Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of groundwater contamination characterization
- o Interpretation of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations or plans for additional investigative work of remediation

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

Please be reminded to copy Richard Hiett, San Francisco Bay Region-Water Quality Control Board, on all correspondence and reports.

If you have any questions or comments, please contact Ms. Juliet Shin at (510) 271-4320.

Sincerely,

Thomas Peacock, Supervising HMS Hazardous Materials Division

Momas Deacoch

cc: Richard Hiett, RWQCB
Richard Quarante, Alameda Fire Dept.
Edgar Howell-File (JS)
Sean Carson, Subsurface Consultants



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

May 11, 1990

Peter Van Inwegen Mariner Boat Yard, Inc. 2415 Mariner Sq. Dr. Alameda, CA 94501

Dear Mr. Van Inwegen

Here are the underground tank registration forms I mentioned when we met last month. Please fill out and return both forms to us within 15 days of the date of this letter.

If you choose to keep your gasoline tank the annual registration fee will be \$125. If you decide to remove the tank the county will require a deposit of 3 times the annual fee. This deposit will cover our expenses while monitoring the tank removal, soil testing, etc. Any deposit remaining when the job is complete will be returned to you.

If you have any questions please contact Bill Faulhaber at 271-4320.

Sincerely yours,

Edgar B. Howell, III

Chief, Hazardous Materials Division

EH:WF

cc: Rafat Shahid, Director of Environmental Health Marvin Helms, Capt., Fire Prevention Bureau, 1300 Park St., Alameda, 94501

W. Faulhaber, Hazardous Materials Specialist