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

RO#718

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

October 28, 1996
STID 5702

Attn: Priscilla Banks
YWCA of America
1515 Webster St.
Oakland CA 94612

RE: YWCA site, 1515 Webster St., Oakland CA 94612

Dear Ms. Banks,

I understand that you have replaced Beverly Davis, to whom I sent my last letter, dated 7/15/96. I understand that the boring investigation was completed in July by ACC Environmental, and that they sent you three copies of their final report in late August. To date, I have not received a copy of the final ACC report. I understand that the results indicated non-detect (ND) to low concentrations of contaminants. It is possible that this case could be closed, and a Remedial Action Completion Certificate, aka final closure letter, could be sent to you.

Therefore, you are requested to **submit the final ACC report within 30 days, or by November 28, 1996,** under your own cover letter. **Please be advised that "no person shall close an underground tank system unless that person . . . demonstrates to the appropriate agency . . . that the site has been investigated to determine if there are any present, or were past releases, and if so, that appropriate corrective or remedial actions have been taken," as per Section 25298 (c) (4) of the California Health & Safety Code, (CH&SC) Division 20, Chapter 6.7.**

If you have any questions, please contact me at 510-567-6761.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Dave Dement, ACC, 7977 Capwell Dr., Suite 100, Oakland CA 94621
Jennifer Eberle/file

je.5702-B

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

R0718

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

July 15, 1996
STID 5702

Attn: Beverly Davis
YWCA of America
1515 Webster St.
Oakland CA 94612

RE: YWCA site, 1515 Webster St., Oakland CA 94612

Dear Ms. Davis,

I am in receipt of the "Work Plan," prepared by ACC Environmental, dated July 9, 1996. This workplan involves the installation of four boreholes around the former underground storage tank (UST) excavation via a small diameter pneumatic sampling probe. Grab groundwater samples will be collected from each boring, if water is encountered at the depth drilled, approximately 25' below ground surface (bgs). One or two soil samples will also be collected in the vicinity of the UST.

This workplan is acceptable on the condition that the soil samples be collected from depths of between 17.5'bgs to 23'bgs. The rationale for this depth is that a) the soil sampled from a depth of 23'bgs was moist, and therefore in the capillary fringe, and b) the initial tank pit samples were collected from a depth of 17.5' to 18'bgs. This is probably the range of depth at which samples are intended.

Please notify me at least 2 business days in advance of field work, so I may arrange to be present onsite, if my schedule allows. If you have any questions, please contact me at 510-567-6761.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Lucy Tyndall, Swinerton and Walberg, Construction Managers, 1515 Webster St., Oakland CA 94612 (sent by fax # 452-3175 on 6/14)
Dave Dement, ACC, 7977 Capwell Dr., Suite 100, Oakland CA 94621
Acting Chief/file

je.5702-A

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

RO # 718

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

June 14, 1996
STID 5702
page 1 of 3

Attn: Beverly Davis
YWCA of America
1515 Webster St.
Oakland CA 94612

RE: YWCA site, 1515 Webster St., Oakland CA 94612

Dear Ms. Davis,

An underground storage tank (UST) was removed from below the sidewalk on Webster St. on 6/10/96. The UST was reportedly 1500 gallons in size and containing diesel fuel. I was present onsite during tank removal operations. The UST was buried quite deep below grade; the bottom of the UST was approximately 17' below ground surface (bgs). There was a sizable hole near the top of the UST, which the contractor reportedly did not cause. The UST was riveted, indicating an approximate age of 50-75 years. Three soil samples were collected from below the UST, at a depth of approximately 17.5' to 18'bgs; two were submitted for laboratory analysis. The stockpiled soils were also sampled.

Results from the tank pit soils indicate a maximum contaminant level of 8,800 parts per million (ppm) Total Petroleum Hydrocarbons as diesel (TPH-d); benzene was not detected at a raised detection limit of 0.20 ppm. Results from the stockpiled soils indicate 530 ppm TPH-d and non-detect (ND) benzene.

These concentrations were compared to the Tier 1 look up table in the American Society of Testing and Materials' (ASTM) "Risk Based Corrective Action Applied at Petroleum Release Sites," document E1739-95. Even though benzene was ND, the detection limit (DL) was raised; the DL is usually 0.005 ppm. So it is possible that up to **0.19 ppm benzene** was present in the tank pit soils. This soil concentration (0.19 ppm) is less than the Risk Based Screening Levels (RBSLs) for **1)** the "soil to outdoor air" pathway, commercial scenario, 10-4 target level (13.25 ppm); **2)** the "soil to outdoor air" pathway, commercial scenario, 10-5 target level (1.325 ppm); and **3)** the "soil to indoor air" pathway, commercial scenario, 10-4 target level (0.49 ppm).

In addition, the **maximum concentration of TPH-d (8,800 ppm)** was compared to the Tier 1 look up table. Since TPH-d does not appear in the look up table, this concentration can be extrapolated for two of its constituents which do appear in the look up table, napthalene and benzo(a)pyrene. The comparison is a moot issue for the "soil to outdoor air" pathway, because the table indicates "RES," meaning that the "selected risk level is not exceeded for pure compound present at any concentration." The same is true for the "soil to indoor air" pathway for benzo(a)pyrene. However, the "soil to indoor air" pathway has a RBSL of 107 ppm

napthalene (commercial scenario, hazard quotient). To extrapolate TPH-d, we multiply 8,800 ppm x 0.0013 (since diesel fuel is 0.13% napthalene). The result is 11.44 ppm napthalene, which is clearly less than the RBSL of 107 ppm. The "soil to building" pathway is a more conservative pathway to use anyway, because the building lies approximately 5' away from the tank pit.

There is a rationale for leaving the "contaminated" soils in place in the tank pit, based on the Tier 1 analysis. However, due to a) the elevated TPH-d concentrations, and b) the proximity to groundwater, which lies approximatley 20 to 25'bgs, a groundwater investigation is warranted, as per Sect. 2724 of Chapter 16, Division 3, Title 23, California Code of Regulations. **You are requested to submit a workplan for a Soil and Water Investigation (SWI) within 45 days, or by July 29, 1996.** Reports and proposals must be submitted **under seal** of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.

A traditional groundwater investigation consists of a minimum of three monitoring wells in an equilateral triangular configuration to determine groundwater flow direction and to assess groundwater quality. However, based on the nature of the contaminant (diesel has relatively little benzene, as opposed to gasoline), it would be acceptable to use rapid site assessment methods (i.e. cone penetrometer testing, geoprobe, hydropunch, etc.) to qualitatively assess impacts and to define the extent of the possible groundwater contaminant plume, at least as a first step of the SWI. If groundwater is heavily impacted, the results of the SWI will be used to later implement corrective action, as per a Corrective Action Plan, as defined in Sect. 2726 of Chapter 16, Division 3, Title 23, California Code of Regulations. If groundwater is not impacted, or relatively clean, no further work will be required. Soil samples should also be collected in order to define the extent of the soil contamination. It is likely that the soil contamination centers around the tank pit; however, this can only be verified by more sampling. Soil and water samples should be analyzed for TPH-d and BTEX.

You may opt to keep the tank pit open while doing the soil and groundwater investigation. If groundwater is relatively impacted by hydrocarbons, you may want to remove the diesel-impacted soil from the tank pit. Another option is tofirst remove the diesel-impacted soil from the tank pit in the hope of limiting the impact to groundwater, then fill in the tank cavity to grade, thus ensuring a greater degree of site safety, and then implement the SWI.

You may reuse the stockpiled soil in the tank cavity. Although the concentration is 530 ppm TPH-d and ND benzene, the same Tier 1 analysis applies. Note that the DL for benzene in this case was 0.050 ppm, which is more conservative than 0.20 ppm.

I believe our mutual goal is the closure of this case, at which point a closure letter will be issued from this office, and signed by the Director of this Department. As you probably know, the closure letter is usually paramount in importance when doing a property transfer or refinancing a property loan.

The remaider of the initial $603.00 deposit made by Microsearch will be refunded to them; this deposit was for our oversight re the tank removal. Since we are requesting a SWI, the case has since been transferred to our Local Oversight Program. A Notice is being sent to you under separate cover.

If you have any questions, please contact me at 510-567-6761.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Lucy Tyndall, Swinerton and Walberg, Construction Managers, 1515 Webster St., Oakland CA 94612 (sent by fax # 452-3175 on 6/14)
Dave Dement, ACC, 7977 Capwell Dr., Suite 100, Oakland CA 94621
Ron Brown, Microsearch Environmental, 318 Harrison St., Suite 1A, Oakland CA 94607
Acting Chief/file

je.5702