AGENCY DAVID J. KEARS, Agency Director Envision: O Alaska St. Oakland

R0876

May 12, 1998

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

ATTN: Sir Or Madam

Navy Public Works Center P O Box 24003 Oakland CA 94623

RE: Project # 2554A - Type M

at 0 Oakland Army Base in Oakland 94626

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. replenish the account, please submit an additional deposit of \$565.00, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested or any unused monies will be refunded to you or your designee.

The deposit refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$94 per hour.

Please be sure to write the following identifying information on your check: - project #

type of project and

- site address

(see RE: line above).

If you have any questions, please contact Amir Gholami at (510) 567-6876.

Sincerely

Tom Peacock, Manager

Environmental Protection

c: files

#### DAVID J. KEARS, Agency Director

**ALAMEDA COUNTY** 

HEALTH CARE SERVICES AGENCY



RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH State Water Resources Control Board Division of Clean Water Programs UST Local Oversight Program 1131 Harbor Bay Parkway Alameda, CA 94502-6577 (510) 567-6700

August 25, 1995

Lester Schmitner U.S Army Corps of Engineers Sacramento District, 1325 J Street Sacramento, CA - 95814

Subject: Underground Storage Tank Sites located at Oakland Army Base, Oakland, California

Dear Mr. Schmitner:

I am in receipt of the document "Site Characterization Workplan for Underground Storage Tank Site TK6", dated July 10, 1995 prepared by SCS Engineers for the above mentioned site. This document has been reviewed by this Department and our comments are given below:

- In October 1994, overexcavation was done to a depth of 6 to 1. 8 ft in the area of tank removal and was continued until the sidewall soils, had less than 100 ppm hydrocarbons, based on field screening. On the southeast side of the building, excavation could not be continued to completion due to the presence of Building 991. Eight confirmation soil samples and one groundwater sample were collected from the excavation. None of the soil samples had gasoline or BTEX but contained diesel in concentrations of up to 130 ppm. The groundwater sample contained 1900 ppm diesel. Please include a site map with the locations of soil and groundwater confirmation samples, as this would indicate the extent to which the soil and groundwater contamination has been characterized.
- According to your report, subsequent to tank removal and 2. overexcavation, approximately 250 cubic yards of soil was disposed of at Forward Incorporated Landfill in Manteca, California. Please submit a copy of the manifest to document this disposal or indicate a report submitted to this Department which documents this disposal.
- Please indicate the report that included the boring logs 3. for the 3 monitoring wells installed by ELM for TK6.
- The workplan includes drilling 8 exploratory borings and 4. installing additional wells. Based on the results of soil overexcavation it appears that the extent of soil contamination has been mostly defined. Hence please include rationale as to the need for additional soil borings and

monitoring wells. Also if additional work is needed, then indicate the location of new borings and monitoring wells in a site map.

If you have any questions, call me at (510) 567-6764.

Sincerely,

Madhulla Logan,

Hazardous Material Specialist

C: James Nusrala, San Francisco Regional Water Quality Control Board, 2101 Webster Street, Suite 500, Oakland, CA-94612

Nels Johnson, 6761 Sierra Court, St D, Dublin, CA-94568-2611

John O'Kane, DTSC, 10151 Croydon Wy, Suite 3, Sacramento, CA-95827-2106

ALAMEDA COUNTY **AGENCY** 

DAVID J. KEARS, Agency Director



August 17, 1995

Lester Schmitner U.S Army Corps of Engineers Sacramento District, 1325 J Street Sacramento, CA - 95814

DEPARTMENT OF ENVIRONMENTAL HEALTH Environmental Protection Division 1131 Harbor Bay Parkway, #250 Alameda, CA 94502-6577 (510) 567-6700

Subject: Underground Storage Tank Sites located at Oakland Army Base, Oakland, California

Dear Mr. Schmitner:

I am in receipt of the Draft Monitoring Well Completion Report, dated May 24, 1995 submitted by SCS Engineers for the above referenced property. This document was reviewed by this Department and a meeting was held on July 18, 1995 with SCS Engineers and Vincent Christian of the San Francisco Regional Water Quality Control Board to discuss issues regarding the project.

Based on the review and discussion in our meeting, it was decided that some of the tank sites mentioned in the report may need additional site characterization, mostly in defining the groundwater plume. However the specifics of this cannot be decided unless a risk based cleanup level is computed for the underground Based on the cleanup level a reasonable storage tank sites. decision can be made as to which of the tank sites need additional work in site characterization or/and remediation.

Hence please submit a workplan to this Department to conduct a basewide risk assessment which can come up with a reasonable cleanup level for the contaminants found in the referenced site. In order to conduct a risk assessemnt, in future, contaminants that have established toxicity factors and those that most likely drive the risk i.e., Poly Nitro Aromatics (PNA's), BTEX, etc., should be included in the laboratory analysis of the soil and groundwater samples.

If you have any questions, call me at (510) 567-6764.

Sincerely,

Madhulla Logan,

Hazardous Material Specialist

Vincent Christian, 2101 Webster Street, Suite 500, Oakland, CA- 94612 Nels Johnson, 6761 Sierra Court, St D, Dublin, CA - 94568-2611 John O'Kane, DTSC

DAVID J. KEARS, Agency Director

R0876

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

CERTIFIED MAILER # Z 196 176 821

March 20, 1995

Randy Smith Southern Pacific Transportation Company 1 Market Plaza San Francisco, CA - 94105

Sub: Southern Pacific Transportation Company - Oakland Army Base Oakland, CA

Dear Smith:

I am in receipt of the document "Modification of the September 13, 1994 workplan" dated March 6, 1995 for the referenced property. Following your request for approval, the modified workplan has been reviewed and accepted with the following changes:

- A total of 3 wells have been proposed in the workplan. One additional monitoring well should be installed within the area of excavation between the proposed replacement well MW-2 and the upgradient well, north of the excavation. This is required for a complete characterization of any existing groundwater contamination or to confirm the absence of the same.
- The replacement well for MW-2 should be slightly downgradient to the former monitoring well MW-2.
- Groundwater analysis should be continued for cadmium as the monitoring data for the previous 5 quarters had indicated the presence of cadmium above the MCL (5 ppb) concentrations.

If you have any questions, call me at (510) 567-6764

Sincerely,

Madhulla Logan

Hazardous Materials Specialist

John Cavanaugh, Industrial Compliance, 9838 Old Placerville

Rd, suite 100, sacreamento, CA - 95827

Steven Mitchell, Oakland Army Base

Gina Kathuria, California Regional Water Quality Control

Board

#### HEALTH CARE SERVICES

AGENCY DAVID J. KEARS, Agency Director



R0876

RAFAT A. SHAHID, Assistant Agency Director

September 1, 1994

Mr. Paul Townsend US Army Engineer District, Sacrament ATTN: CESPK-ED-EC (Paul Townsend) 1325 J Street Sacramento, CA 95814-2922 Alameda County CC 4580 Health Care Services Agency Dept. Of Environmental Health 1131 Harbor Bay Pkwy 2nd Flr. Alameda. CA 94502-6577

STID 2056

Re: Investigations at Oakland Army Base (OAB)

Dear Mr. Townsend,

This office has reviewed SCS Engineer's (SCS) Ground Water Monitoring Report, Sampling Event #6, dated August 1, 1994. In the report, conclusions regarding the water quality of ground water samples are based on a taste and odor threshold of 500 ppb of Total Petroleum Hydrocarbons (TPH), established by the Santa Clara Water District. However, this threshold has never been established as a guideline by the Regional Water Quality Control Board (RWQCB), and cannot be used as a gauge for potential closure of various tank sites. However, this threshold may be used to prioritize the various tank sites at OAB.

Formal cleanup levels for TPH, and a number of other contaminant constituents, have not yet been established. Therefore, cleanup levels are generally developed on a site specific basis through Risk Assessments. If OAB intends to leave contaminants in the ground water or soil, the preparation of a risk assessment will be required to show that these levels will not pose a future threat to human health, aquatic life, or the environment.

SCS states, on Page E-6 of the report, that TPHd concentrations in the background wells are attributable to the presence of solvents and the breakdown of plant matter. If OAB intends on using this argument to suggest that the TPHd contaminants observed in these wells are not attributable to the site, then further justification/elaboration is required.

As stated in the County's July 30, 1994 letter, the metals contamination aspect of the site has been transferred to RWQCB for oversight. Therefore, any proposals related to the metals problem at the site should be referred to RWQCB.

Per my conversation with Nels Johnson on September 1, 1994, Mr. Johnson stated that the passive recovery system for product removal at Tank Site C is not working, since not enough product Paul Townsend Re: OAB September 1, 1994 Page 2 of 3

is available for absorption. Therefore, as proposed by SCS, it is acceptable to discontinue passive recovery at Tank Site C at this time. However, please be reminded to provide close supervision for any potential increases in product. If product levels increase, you will be required to resume passive product recovery.

This office has noted that utility and sprinkler lines are prevalent at the various tank sites. Further investigations should be conducted to assure us that these lines are not acting as conduits for contaminant plume migration.

Per SCS's proposals regarding monitoring frequencies, the following changes are acceptable to this office:

- o Sampling of Wells 56, 22, and 26 may be reduced to annual monitoring;
- o Sampling of wells at Tank Site 15 may be reduced to semiannual monitoring; and
- o It is the understanding of this office that any proposals for altering sampling frequencies at TK2, TK3, and TKA will be postponed until results from the contaminated backfill investigations are provided.

Lastly, the County concurs with SCS's proposal to implement a periodic maintenance/inspection program of wash-rack systems and geophysical surveys for abandoned hydraulic lifts.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Nels Johnson SCS Engineers

> 6761 Sierra Court, Ste D Dublin, CA 94568-2611

Paul Townsend Re: OAB September 1, 1994 Page 3 of 3

Steve Mitchell
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

H.S. Leite Department of the Army Military Traffic Management Command HQ, Western Area, Oakland Army Base Oakland, CA 94626-5000

Les Schmittner
US Army Engineer District, Sacramento
Attn: CESPK-ED-EC (Les Schmittner)
1325 J Street
Sacramento, CA 95814-2922

Edgar Howell

R0876

RAFAT A. SHAHID, Assistant Agency Director

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

August 18, 1994

ATTN: Randall Smith

Southern Pacific Transp. 1 Market Plaza San Francisco CA 94105

RE: Project # 2050A - M

at O Alaska St Bldg 1 in Oakland 94626

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$1,500.00, payable to Alameda County.

Please write your project number and site address on your check.

We must receive this deposit before we perform any further work on this project. At the completion of this project, any unused monies will be refunded to you or your designee.

If you have any questions, please contact Madhulla Logan at (510) 271-4320.

Sincerely,

Edgar B Howell III, Chief Hazardous Materials Division

c: files/inspector

### HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director

SITE ADDRESS: O Alaska St.
Oakland, CA

R0976

RAFAT A. SHAHID, Assistant Agency Director

Health Care Services Agency Dept. Of Environmental Health

Alameda. CA 94502-6577

1131 Harbor Bay Pkwy 2nd Flr.

Alameda County

August 8, 1994

Mr. Paul Townsend

US Army Engineer District, Sacramento

ATTN: CESPK-ED-EC (Paul Townsend)

1325 J Street

Sacramento, CA 95814-2922

STID 2056

Re: Work plan for investigations at Building 991, Oakland Army

Base, Oakland

Dear Mr. Townsend,

This office has reviewed ELM Environmental's (ELM) work plan, dated July 20, 1994, for investigations at Building 991 of the Oakland Army Base (OAB). Samples collected from the trenching shall be analyzed for TPH as diesel and BTEX. Additionally, per Section 2722, Article 11, Title 23 California Code of Regulations, you are required to address the floating product problem at this site. As the regulations state, "The responsible party shall take or contract for interim remedial actions, as necessary, to abate or correct the actual or potential effects of an unauthorized release." Interim remedial actions can occur concurrently with any phase of corrective action. The removal of free product shall comply with the applicable provisions of Section 2655, Article 5, Title 23 California Code of Regulations.

Per my conversation with George Liu on August 8, 1994, OAB will address this interim remediation requirement following the phase of work outlined in ELM's work plan. You are required to submit a timetable with projected dates for the anticipated work. This timetable shall be submitted to this office within 30 days of the date of this letter.

ELM's work plan is acceptable to this office with the above conditions. If you have any questions or comments, please contact me at (510) 567-6763 or (510) 567-6700.

Sincerely,

Juliet Shin

Hazardous Materials Specialist

Paul Townsend Re: OAB August 8, 1994 Page 2 of 2

cc: Mark Bonsavage
Department of the Army
Military Traffic Management
Command HQ, Western Area
Oakland Army Base
Oakland, CA 94626-5000

George Liu
US Army Engineer District, Sacramento
ATTN: CESPK-ED-EC (Paul Townsend)
1325 J Street
Sacramento, CA 95814-2922

Mark J. Hallock Remedial Constructors, Inc. 8627 Diamond Oak Way Elk Grove, CA 95624

Edward L. Mulvihill ELM Environmental, Inc. 3336 Fogle Ct. Carmichael, CA 95608

Edgar Howell-File(JS)

RAFAT A. SHAHID, Assistant Agency Director

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

June 20, 1994

Mark S. Dockum
James G. Jensen
Southern Pacific Environmental Systems, Inc.
Industrial Compliance
9719 Lincoln Village Drive
Suite 310
Sacramento, CA 95827

Re: Comments on the Soil and Ground Water Study Work Plan, dated March 29, 1994 for the ASI Lease Site, Oakland Army Base, Oakland, CA 94626

Dear Mr. Dockum and Jensen:

I have received and reviewed the above noted work plan and also the first quarterly monitoring report dated April 15, 1994.

The work plan uses cleanup level guidelines from a previously submitted Risk Assessment for a Southern Pacific Transportation Company Site at 1912 Seventh Street, Oakland, CA. Based on this study Southern Pacific Industrial Compliance (Industrial Compliance) recommends 100 mg/kg and 18 mg/kg as clean up levels for Total Petroleum Hydrocarbons (TPH) and benzene impacted soil at the site. For groundwater management, Industrial Compliance proposes to remove free phase product if encountered in the wells and conduct quarterly groundwater monitoring.

Industrial Compliance proposes on site remediation of the petroleum hydrocarbon impacted soils by ex-situ bioremediation. Also, two monitoring wells are proposed following over excavation and back filling.

1) You are requested to provide additional information as to the location of soil remediation at the site, site control measures, a description of the treatment containment area, treated soil confirmation sampling type and frequency. It is unclear whether the excavation will be back filled or whether the excavation will remain open until such time as the soil has been sufficiently remediated to be replaced back into the excavation.

The risk assessment prepared for the 1912 Seventh Street location is presumed to address fuel related contamination. The nature of the contamination at the ASI lease site appears to be primarily from either the anticorrosive compound used on Subaru vehicles or from the solvent (Cosmaline) used to remove this material during vehicle washing.

M. Dockum/J. Jensen June 20, 1994 page 2 of 3 To date, high levels of benzene in soil or groundwater have not been detected at the site. 2) The work plan states that impacted and non impacted soils will be separated. Please clarify how this separation will be conducted. 3) Cosmaline does not appear to contain high benzene levels. order to properly to assess the clean up levels for soil and ground water it is first necessary to determine the contaminant(s) of concern (coc) present in the Subaru coating material and for Cosmaline. You are requested to provide a copy of the material safety data sheet (msds), chemical profile or similar sheet which would list the chemical content of each of these materials. As stated in your work plan proposal it may be that there are no definitive data to indicate that benzene has an adverse health effect on salt water aquatic organisms at concentrations less than 700 ug/l. At this time it is unclear what effects that components of cosmaline or undercoating materials pose to human health or the environment. 4) Free phase product has been identified in MW-2. This material needs to be removed on a weekly basis. You are required to retain records of the amount removed and to report it on an monthly/quarterly basis.

5) Figure 8 indicates the location of two additional ground water monitoring wells scheduled to be installed after the excavation and back filling have been completed. The hydraulic gradient has been determined to be toward the southeast. The proposed location of one of the additional wells is up gradient. You are requested to place this well south of MW-2 and EB-7 in native material, as close as possible to the excavation.

Finally, I wish to inform you that I will no longer be the case worker on the ASI lease site. Your new case worker from this Department is Madhulla Logan. In order to maintain project continuity, I am willing to assist Ms. Logan in addressing concerns expressed in this letter or to attend future meetings.

M. Dockum/J. Jensen June 20, 1994 page 3 of 3

Please feel free to contact me or Ms. Logan at (510) 271-4320 with any question or concerns you may have.

Sincerely,

Paul M. Smith

Senior Hazardous Materials Specialist

C:

Randall T. Smith, Southern Pacific Transportation Co., Southern Pacific Building, San Francisco, CA 94105 Gina Kathuria, CA Regional Water Quality Control Board San Francisco Region, 2101 Webster St., Suite 500, Oakland, CA 94612

Paul Townsend, U.S. Army Corps. of Engineers, Sacramento District, 650 Capitol Mall, Sacramento, CA 94814-4794 H.S. Leite, Office of Staff Engineer, Military Traffic Command, HQ Western Area, Oakland Army Base, Oakland, CA 94626-5000

#### ALAMEDA COUNTY **HEALTH CARE SERVICES AGENCY**

DAVID J. KEARS, Agency Director

SITE: O Alaska St. Oakland · CA

R0876

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 3, 1994

Paul Townsend US Army Engineer District, Sacramento Attn: CESPK-ED-EC (Paul Townsend) 1325 J Street Sacramento, CA 95814-2922

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 2056

The 90 percent submittal of the work plan for installation Re: of additional ground water monitoring wells at the Oakland Army Base (OAB)

Dear Mr. Townsend,

This office has reviewed SCS Engineer's 90 percent submittal of the work plan for additional ground water investigations at the This work plan is acceptable to this office with the following requirements/reminders:

- As stated in our July 30, 1993 letter to you regarding the initial ground water work plan submitted in January 1993, you are required to resume quarterly monitoring of Well MW-56 at TK 7/8. There was no mention of this in the work plan.
- The work plan made no mention of TK2, TK3, TK14, TK15, or TKA. As stated in the July 30, 1993, you are still required to continue semi-annual monitoring at these tank sites, so the sites should be mentioned in your work plan. This office only granted discontinuation of monitoring at TK 1 and TK 17.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

Paul Townsend Re: OAB March 3, 1994 Page 2 of 2

cc: Glenna M. Eiermann
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

H.S. Leite
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

Nels Johnson SCS Engineers 6761 Sierra Court, Ste D Dublin, CA 94568

Edgar Howell-File(JS)



January 20, 1994

Paul Townsend, P.E. U.S. Army Corps of Engineers CESPK-ED-EB (DERP Section) 1325 J Street Sacramento, CA 95814-2922 DEPARTMENT OF ENVIRONMENTAL MEALTH Hazaroop, Hagarins Olvishin 80 Swan Way, Rm. 200 Oakland, CA 94621 (510) 271-4320

Re: Review of Site Characterization Workplan and Site Specific Safety and Health Plan (November 1993) for Oakland Army Base, Site 807, Oakland, CA 94626-5000

Dear Mr. Townsend:

The following comments are presented based upon review of the above noted documents for the next phase of subsurface investigation at Oakland Army Base - Site Building 807:

- 1) The Health and Safety plan proposes to monitor for the presence of vinyl chloride, chloroform, hexachloroethane and 1,1,2,2 tetrachlorethane (TCA) using a photoionization detector. You should be aware that the ionization potentials for the above materials are 10.0, 11.42, 11.22 and 11.10 respectively. When monitoring for the above materials either use a suitable PID bulb or another appropriate instrument.
- The Safety Plan states that colorimetric tubes will be used in the restricted work area for vinyl chloride and chloroform. It is assumed that an appropriate number of colorimetric tubes will be used, as necessary, depending on the type of field activity being conducted i.e., during monitoring well installation, in areas where potential exposure to site workers or the general public exists.
- 3) After review of Figures 3 and 5 of the Proposed Investigation Report outlining potential areas of concern from previous activity and also indicating proposed locations where borings will occur. It was noted that no borings/sampling were specified in the area identified in the USATHAMA report where damaged containers had allegedly leaked (see Fig. 3); as the investigation warrants, investigation in this are may be necessary.
- 4) No eye wash equipment was specified in the Safety Plan. Due to the health concerns associated with vinyl chloride, and possibly other chemicals of concern, you are required to have an eye wash available on site during work activity.

You are requested to inform me of the scheduling of work at the site so that a representative from my Agency will have the opportunity to make a site visit during some portion of the next

Mr. Townsend page 2 of 2 January 20, 1994

phase of work at the site.

Finally, after reviewing the deposit refund account status for this project it became apparent that the initial \$1,000 submitted on 7/15/93 is nearly depleted. Based upon the projected scope of this project, currently in the investigation phase, you are requested to remit an additional \$2,000 to cover Division staff time spent in the regulatory oversight of this project. A check should be made payable to "Alameda County Treasurer". The deposit refund mechanism is authorized in Alameda County Ordinance Code Section 3-141.6 which allows for the establishment of a deposit refund mechanism for staff time spent on site mitigation cases. Your account is being billed at the rate of \$75.00 per hour. Any unused portion of these funds will be returned to you at the completion of the project.

Please contact me if you have any concerns or questions at (510) 271-4320.

sincerely,

faul m. Show

Paul M. Smith Senior Hazardous Materials Specialist

Glenna Eiremann, Environmental Engineer, Department of the Army, MTMC, HQ Western Area, Oakland Army Base, Oakland, CA 94626-5000

Gina Kathuria, CA Regional Water Quality Control Board, San Francisco Region, 2101 Webster Street, Suite 500, Oakland, CA 94612

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DAVID J. KEARS, Agency Director

R0876

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

December 6, 1993

Paul Townsend
US Army Engineer District, Sacramento
Attn: CESPK-ED-EC (Paul Townsend)
1325 J Street
Sacramento, CA 95814-2922

STID 2056

Re: Soil Leachate Test Results for stockpiled soil at the Oakland Army Base site

Dear Mr. Townsend,

This office has received The Mark Group's Soil Leachate Report, dated November 4, 1993. After review of this report by Dr. Ravi Arulanantham in our office, it was determined that reuse of this soil at the above site would be acceptable.

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

Sincerely

Juliet Shin

Hazardous Materials Specialist

CC: Glenna M. Eiermann
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

H.S. Leite
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

Thomas E. Lindemuth The Mark Group, Inc. Hookston Square, Ste 120 3480 Buskirk Ave. Pleasant Hill, CA 94523

Edgar Howell-File(JS)

### ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

DAVID J. KEARS, Agency Director

R0876

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

December 6, 1993

Paul Townsend
US Army Engineer District, Sacramento
Attn: CESPK-ED-EC (Paul Townsend)
1325 J Street
Sacramento, CA 95814-2922

STID 2056

Re: Investigations at the Oakland Army Base (OAB)

Dear Mr. Townsend,

This office has received the final draft work plans for investigations pertaining to Tank Site 18 and the contaminated backfill at the tank sites, and the corresponding Health and Safety Plan. The work plans and the Health and Safety plan are acceptable to this office.

Field work shall commence within 60 days of the date of this letter. A report documenting the work shall be submitted to this office within 45 days after field activities are completed.

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

Sincerely

Juliet Shin

Hazardous Materials Specialist

cc: Gina Kathuria, RWQCB

Glenna M. Eiermann
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

H.S. Leite
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

Paul Townsend Re: OAB December 6, 1993 Page 2 of 2

> Nels Johnson SCS Engineers 6761 Sierra Court, Ste D Dublin, CA 94568

Edgar Howell-File(JS)

## ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

DAVID J. KEARS, Agency Director

R0876

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

October 14, 1993

Paul Townsend
US Army Engineer District, Sacramento
Attn: CESPK-ED-EC (Paul Townsend)
1325 J Street
Sacramento, CA 95814-2922

STID 2056

Re: Investigations at the Oakland Army Base (OAB)

Dear Mr. Townsend,

This office has received and reviewed SCS Engineer's (SCS) Ground Water Monitoring Report, Sampling Event #5, dated September 7, 1993. Page E-9 of the report gives a litany of OAB tank sites that SCS stipulates are to be reduced to semi-annual monitoring. However, this list is incorrect. Per the July 30, 1993 letter from this office, only Tank Sites 2, 3, 14, 15, and A can be switched to semi-annual monitoring. Please be sure to comply with all the other comments/requirements given in the July 30, 1993 letter.

The report also states that the sampling of the Background Borings will be switched to semi-annual and that metals analysis will be discontinued for the individual tank sites. It is the understanding of this office that the Regional Water Quality Control Board (RWQCB) will be assuming the oversight of the metal contamination at the site. Consequently, please be sure and present these sampling proposals to RWQCB to obtain their approval or concurrence prior to implementing them.

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

Sincerely

Juliet Shin

Hazardous Materials Specialist

Paul Townsend Re: OAB October 14, 1993 Page 2 of 2

#### cc: Gina Kathuria, RWQCB

Glenna M. Eiermann Department of the Army Military Traffic Management Command HQ, Western Area, Oakland Army Base Oakland, CA 94626-5000

H.S. Leite
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

Nels Johnson SCS Engineers 6761 Sierra Court, Ste D Dublin, CA 94568

Edgar Howell-File(JS)

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

RAFAT A. SHAHID, Assistant Agency Director

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

September 29 1993

Mr. Hemant Patel
Branch Director
Navy Public Works Center
San Francisco Bay, Code 614
P.O. Box 24003
Oakland, CA 94623-1003
Utilities Building 441B

Re: September 28, 1993 Work plan approval for contamination at PWCSFB vehicle storage area beneath Grand Avenue overpass, Oakland Army Base, Oakland, CA 94626

Dear Mr. Patel:

Alameda County Environmental Health Department (ACEH) has reviewed the above mentioned Work Plan for Clean-Up of the Oakland Army Base Vehicle Storage Lot, currently leased to the Navy Public Works Center San Francisco Branch, Oakland, CA.

The work plan specifying the next phase of over excavation and confirmation sampling is approved. As discussed in our telephone conversation yesterday please provide copies of all support documentation including a graphic depiction of initial and confirmation sampling locations which occurred during each phase of work, manifests, bill of ladings for soil excavated, chain of custody, analytical reports and a narrative description of the previous work at the site.

If you have any questions regarding the content of this letter please do not hesitate to contact me.

Sincerely,

Paul M. Smith

Senior Hazardous Materials Specialist

cc:

David Recoder, Navy Public Works Center, San Francisco Bay, P.O. Box 24003, Code 710, Oakland, CA 94623-1003, Transportation Building #833

Glenna Eiermann, Department of the Army, MTMC, HQ, Western Area, Oakland Army Base, Oakland, CA 94626-5000 Richard Hiett, California Regional Water Quality Control Board, San Francisco Bay Region, 2101 Webster St.,

Oakland, CA 94612



R0876

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

DAVID J. KEARS, Agency Director

July 30, 1993

Mr. Paul Townsend
US Army Engineer District, Sacramento
Attn: CESPK-ED-EC (Paul Townsend)
1325 J Street
Sacramento, CA 95814-2922

STID 2056

Re: Investigations at the Oakland Army Base

Dear Mr. Townsend,

This office has reviewed SCS Engineer's Ground water Monitoring Report Sampling Event #4/ work plan, dated January 1993, for the above site. This office has the following comments on this report:

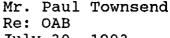
- o (Pg. E-7)-TK 7/8, along with some other sites, also contains or contained at least one contaminated well.
- o As stated in the report, ground water samples collected from the background borings will be analyzed for cyanide in the next round of sampling. Per our past discussions, please submit these samples to two different laboratories for cyanide analysis so that we can try and get an accurate determination of the levels of cyanide out at the site.
- o (Pg. E-10)-Contrary to the text, samples collected from TK7/8, TK14, TKA, and TKC were never analyzed for cyanide.
- o (Pg. E-10)-It was not mentioned that additional wells would be installed at TKC.
- o Floating product monitoring and passive removal of product shall continue at MW-16(TKD), MW-17(TKF), and MW-42(TKC) in the same manner and frequency as was conducted in the past.
- o It will be acceptable to switch only the following sites to semi-annual: TK2, TK3, TK14, TK15, and TKA.
- o Well MW-56, located at TK7/8, shall be included for sampling during the quarterly sampling events because the ground water gradient periodically flows in that direction, no borings were recently placed there to

Mr. Paul Townsend Re: OAB

July 30, 1993 Page 2 of 4

evaluate any ground water impact in that area, and elevated levels of unidentified extractable hydrocarbons were identified throughout this tank location.

- o It will be acceptable to discontinue monitoring at TK1 and TK17. You are required to continue quarterly ground water monitoring at TK16 for at least one more quarter to determine if any of the contaminant concentrations noted at that site this quarter persist.
- o Boring HP-4 at TK7/8 identified contaminants in this last round of sampling, and you will be required to address contaminants in this area with a monitoring well.
- o (Pg.4-12)-The report states that upto 0.4ppm of lead has been identified in the ground water at the site. However, it appears that this might be a typo, because the summary soil and ground water evaluation tables do not list this concentration.
- o The extractable hydrocarbons analysis 3510/3520/8015 shall continue at the sites that employed this analysis in this last quarter.
- o Per a conversation between Nels Johnson, SCS Engineers, and myself, the floating product potentially pumped out during the trenching/backfill investigations will be pumped by a vacuum truck, manifested, and properly disposed of off-site.
- o This office feels that a monitoring well is necessary at TKD, east of the former tank near boring HP-3, where 670,000 ppb diesel was identified.
- o At TKM, monitoring wells are required to be installed near or downgradient of borings HP-1 and HP-2, where 6,200 ppb and 4,200 ppb gasoline were identified.
- o At TKQ, 440 ppb gasoline was identified from HP-3. A monitoring well should be placed at or downgradient of this location.
- o It has been determined that the metal concentrations in the soil and ground water at the site are not attributable to the petroleum underground storage



July 30, 1993 Page 3 of 4

tanks. Comparable metal concentrations have been identified from the wells along the perimeter of the site (Background Borings) and at the individual tank sites, while petroleum contaminants have only been identified at the tank sites, and not in the background borings. Since these metal contaminants do not appear to be a problem associated with former petroleum underground storage tanks, the County's Local Oversight Program cannot oversee this aspect of investigations and has transferred this portion of oversight work to the Regional Water Quality Control Board (RWQCB). Per my conversations with Gena Katchuria, RWQCB, analysis for metals must continue at this time.

Lastly, this office has reviewed SCS Engineer's amendments to the Work plan for Contaminated Backfill Investigations/
Characterization, dated July 14, 1993. Please be reminded that if you plan to aerate the central stockpiled soil, you must first notify the Bay Area Air Quality Management District. Until the time that this soil is aerated or disposed of off site, you must cover this pile. During the rains, this soil must be bermed and covered.

Additionally, a metals analysis shall also be conducted for samples collected from TK7/8 during trenching activities. BTEX analysis shall also be conducted for samples collected from TKQ, per our discussions at the last meeting.

Please submit a time table for the proposed work within 45 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

cc: Richard Hiett, RWQCB

Gena Katchuria, RWQCB

Mr. Paul Townsend Re: OAB July 30, 1993 Page 4 of 4

> Glenna M. Eiermann Department of the Army Military Traffic Management Command HQ, Western Area, Oakland Army Base Oakland, CA 94626-5000

> H.S. Leite
> Department of the Army
> Military Traffic Management Command
> HQ, Western Area, Oakland Army Base
> Oakland, CA 94626-5000

Nels Johnson SCS Engineers 6761 Sierra Court, Ste D Dublin, CA 94568

Edgar Howell-File(JS)

SITE: O Alaska St. Oakland

### ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

R0876

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

July 8, 1993

Mr. Paul Townsend Oakland Army Base 1325 J St., 12th Floor Sacramento, CA 95814-2922

STID 2056

Re: The work plan for site TK18 at the Oakland Army Base

Dear Mr. Townsend,

This office has received and reviewed SCS Engineer's work plan for further investigations for TK18 at the above site. This work plan is acceptable to this office. Per Appendix A of RWQCB's guidelines, the wells are required to be surveyed to an accuracy of 0.01 foot. Additionally, please be reminded that you are required to wait a minimum of 24 hours after installing the wells before developing them, and that a minimum waiting period of 72 hours is required before sampling these wells.

Field work shall commence within 60 days of the date of this letter. A report documenting the work shall be submitted to this office within 45 days after completing the field work.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Glenna M. Eiermann
Department of the Army
Military Traffic Managem

Military Traffic Management Command HQ, Western Area, Oakland Army Base

Oakland, CA 94626-5000

Mr. Paul Townsend Re: OAB July 8, 1993 Page 2 of 2

H.S. Leite
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

Nels Johnson SCS Engineers 6761 Sierra Court, Ste D Dublin, CA 94568

Edgar Howell-File(JS)

RAFAT A. SHAHID, Assistant Agency Director

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

May 25, 1993

Mr. Steve Worthington Branch Director Navy Public Works Center San Francisco Bay, Code 614 P.O. Box 24003 Oakland, CA 94623-1003 Utilities Building 441B

Re: Work plan approval for contamination at PWCSFB vehicle storage area beneath Grand Avenue overpass, Oakland Army Base, Oakland, CA 94626

Dear Mr. Worthington:

Alameda County Environmental Health Department (ACEH) has reviewed the Work Plan for Clean-Up of the Oakland Army Base Vehicle Storage Lot, currently leased to the Navy Public Works Center San Francisco Branch, Oakland, CA, dated March 1993.

Borings performed during a Phase II investigation indicated significant soil contamination in the area of B-1 from Total Oil and Grease (TOG) at 12,000 ppm and total lead at 230 ppm.

The work plan proposes excavation of the area beneath B-1 to a depth of approximately 2 feet. Confirmation samples will be collected at each of the four sides of the excavation and on the bottom to indicate that all significant contamination has been removed.

The work plan is approved with the following inclusions:

- 1) If the levels of lead encountered exceed 50 ppm you are required to perform a Waste Extraction Test (WET) to determine if the soluble threshold limit concentration (stlc) for this material has been exceeded. Because samples collected from B-1 indicated a lead level of 230 ppm, when characterizing excavated soils from this area you are required to perform a WET. Soil disposal and the need to perform additional soil excavation should be based upon the stlc and total threshold limit concentrations (ttlc) allowable for lead.
- 2) Subsequent to the implementation of the work plan, provide a report to this Division within 45 days of the completion of the work at the site. The report should contain: a narrative description of the excavation, chain of custody documentation, lab results and manifests or receipts for the disposal of all excavated materials from the site.

Mr. Worthington May 25, 1993 page 2 of 2

- 3) Provide the address and certification number of Eureka Laboratory.
- 4) Notify this office in advance of the commencement of the work.

If you have any questions regarding the content of this letter please do not hesitate to contact me.

Sincerely,

From m. Johns

Paul M. Smith Senior Hazardous Materials Specialist

cc:

David Recoder, Navy Public Works Center, San Francisco Bay, P.O. Box 24003, Code 710, Oakland, CA 94623-1003, Transportation Building #833

Glenna Eiermann, Department of the Army, MTMC, HQ, Western Area, Oakland Army Base, Oakland, CA 94626-5000

Richard Hiett, California Regional Water Quality Control Board, San Francisco Bay Region, 2101 Webster St., Oakland, CA 94612

Blair Troutman, Brown and Caldwell Consultants, 3480 Buskirk, Pleasant Hill, CA 94523-4342

R0876

#### RAFAT A. SHAHID;

DEPARTMENT OF Hazardous Materia 80 Swan Way, Rm. Oakland, CA 9462 (510) 271-4320 R0876 ⇒ 971D= 2056

Oakland, CA 9462 IN RBOSE, SOID 4640 13 (510) 271-4320 Oakland Army Base, Bidg.

with no data entry .

Stid # 4640

May 12, 1993

Ms. Glenna Eiermann
Environmental Engineer
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, California 94626-5000

Re: Subsurface Contamination detected in soil adjacent to Building 807, Oakland Army Base, Oakland, CA 94526

Dear Glenna:

Alameda County is in receipt of the Site Investigation work plan prepared by the Army Corps of Engineers (ACE), dated April 21, 1993. The work plan outlines the installation of cone penetrometers and hydropunches to better define the nature and extent of the contamination previously identified during excavation of a construction site adjacent to building 807.

The work plan as proposed is approved with the following inclusions:

- 1) The work plan states that a photo ionization detector (pid) will be used to field screen samples; to determine which ones are analyzed. You should be aware that the ionization potential reported in the NIOSH Pocket Guide to Chemical Hazards for chloroform is 11.42, methylene chloride is 11.32 and for hexacloroethane is 11.22 electron volts. Therefore a standard 10.2 PID bulb is not appropriate to screen for the above materials. Further, after speaking with our staff chemist it became apparent that due to the low vapor pressures of phthalates field screening using a PID is not possible. Therefore you are required to sample for these materials using appropriate instruments or collect samples at prescribed intervals.
- 2) Regarding the collection, transportation and analyses of all samples, a third party is necessary. You are required to specify the name and certification of the laboratory selected for this work.
- 3) The work plan states that monitoring wells may be installed. In a meeting with Paul Townsend on May 5, 1993 it became apparent that well installation would be completed in a different scope of work. It was agreed that a minimum of two grab groundwater samples would be collected in areas where highest soil concentrations are noted. If significant

Ms. Eiermann May 12, 1993 page 2 of 2

contamination is not detected in any of the outlying borings placed away from the initial soil contamination then a boring and water sample will be collected in the area where the subsurface contamination was detected initially.

4) To date, deposit refund funds previously requested for the above project have not been received. Alameda County is authorized in Ordinance Code Section 3-141.6 to charge fees for the regulatory oversight of site mitigation cases such as this one. You are requested to submit a check for \$ 1000.00 made payable to County of Alameda to initiate work on this case. An account will be established and billed against at a rate of \$ 75.00 per hour. Any unused portion of this fee will be returned to you at the completion of the project.

If you have any questions please feel free to contact me at (510) 271-4320.

Sincerely,

Contin Justin

Paul M. Smith Senior Hazardous Materials Specialist

c:

Paul Townsend, U.S. Army Corps of Engineers District Sacramento, CESPK-ED-EB, (DERP Section), 1325 J Street Sacramento, CA 94814-2922

Lester Feldman, San Francisco Regional Water Quality Control Board, 2101 Webster St, Suite 500, Oakland, CA 94612 H.S. Leite, Department of the Army, MTMC, HQ Western Area,

Oakland Army Base, Oakland, CA 94626-5000

### ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

DAVID J. KEARS, Agency Director

R0876

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 8, 1993

Mr. Paul Townsend
US Army Engineer District, Sacramento
Attn: CESPK-ED-EC (Paul Townsend)
1325 J Street
Sacramento, CA 95814-2922

STID 2056

Re: Results of Soil Investigation by The Mark Group, for the Oakland Army Base

Dear Mr. Townsend,

This office has received The Mark Group's Soil Investigation Report, dated February 24, 1993, and the amended Conclusion/Recommendation page for the stockpiled soil. Analysis of soil samples collected from the stockpiled soil identified up to 126.3 ppm Total Oil and Grease, 64.5 ppm Total Petroleum Hydrocarbons by IR, and 8 ppm Total Petroleum Hydrocarbons as diesel.

The Mark Group has recommended that they be given permission to dispose of this stockpiled soil on site. For this office to consider this recommendation, you will be required to prove to this office that the use of the stockpiled soil on site will not pose a threat to ground water. To evaluate the potential threat to ground water quality one has to conduct soil leachability tests. To do this one has to collect representative soil samples and conduct a WET or TCLP test (this will provide a worst case scenario). Compare the leachability results for each contaminant against the respective Federal or State MCL level (or sometimes against the secondary drinking water standards). Results of these tests, coupled with the amount of soil to be disposed of on site and the method and location in which they are to be disposed, will be reviewed by this office to determine whether these soils will pose a threat to ground water.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

Mr. Paul Townsend Re: Oakland Army Base April 8, 1993 Page 2 of 2

cc: Richard Hiett, RWQCB

Thomas E. Lindemuth, P.E. The Mark Group Hookston Square, Ste 120 3480 Buskirk Ave. Pleasant Hill, CA 94523

Glenna M. Eiermann Department of the Army Military Traffic Management Command HQ, Western Area, Oakland Army Base Oakland, CA 94626-5000

H.S. Leite
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

Paul Smith, Alameda County Hazardous Materials Division Edgar Howell-File(JS)

#### **ALAMEDA COUNTY** HEALTH CARE SERVICES **AGENCY**

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

April 2, 1993

Mr. Paul Townsend US Army Engineer District, Sacramento CESPK-ED-EC (Paul Townsend) 1325 J Street Sacramento, CA 95814-2922

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

R0876

STID 2056

Investigation/Characterization Work plan for Contaminated Re: Backfill at Tank Sites, Oakland Army Base

Dear Mr. Townsend,

This office has reviewed SCS Engineer's Draft workplan, dated March 31, 1993, addressing the contaminated backfill for various tank sites at the Oakland Army Base. This work plan proposes that lateral overexcavation only be conducted in areas where soil contamination was formerly observed during the tank removals. However, for many of the tank sites, soil samples were not collected from all the sidewalls, and it is unknown to this office whether the other sidewalls could also have been contaminated. The specific tank sites fitting the above description are the following: TK3, TK14, TKA, TKD, TKF, and TKM. You are required to collect one soil sample from each of the sidewalls at these tank sites, and screen them with a PID using the method described in the "Field Screening Investigated Soils" portion of the report (pg.3-2). If any soil samples collected from sidewalls, not formerly proposed to be excavated, identify readings exceeding 20 ppm, further excavation shall be conducted along these sidewalls as well.

The work plan text states that the northeast wall of TKQ will be overexcavated. However, the figure showing the excavation location indicates that the south wall will be overexcavated. Please look into this discrepancy prior to implementing the work.

Additional analysis to those proposed in the work plan shall be conducted for Tank Sites 7/8, M, and Q. Soil samples collected from TK 7/8 shall be analyzed for the whole array of waste oil constituents outlined in Table 2, RWQCB's Staff Recommendations for the Initial Investigations and Evaluation of Underground Analysis for soil samples collected from TKM and Storage Tanks. TKQ shall include BTEX.

Per a conversation between Nels Johnson, SCS Engineers, and myself on April 2, 1993, overexcavating TK15 would not be practical since the tank was formerly a 12,500 gallon tank and a Mr. Paul Townsend Re: OAB April 2, 1993 Page 2 of 2

great deal of soil would have to excavated from this site. Furthermore, no contamination was detected in the two soil samples collected from the sidewalls of the tank during its removal, and 120 ppm diesel was identified in the stockpiled soil sample. It is acceptable to this office that no overexcavation will be conducted, at this time, for this location based on the above considerations.

Lastly, please submit information on the source of the "clean" fill that will be used to backfill these tank pits when available.

Field work shall commence within 60 days of the date of this letter. A report documenting the work shall be submitted within 60 days after completion of field activities.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Glenna M. Eiermann Department of the Army Military Traffic Management Command HQ, Western Area, Oakland Army Base Oakland, CA 94626-5000

H.S. Leite
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

Nels Johnson SCS Engineers 6761 Sierra Court, Ste D Dublin, CA 94568

Paul Smith, Alameda County Hazardous Materials Division Edgar Howell-File(JS)

## FALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

R0876

DAVID J. KEARS, Agency Director

#### RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621

(510) 271-4530

March 5, 1993

Mr. Paul Townsend Oakland Army Base 1325 J St., 12th Floor Sacramento, CA 95814-2922

STID 2056

Re: Supplemental Scope of Work for the Oakland Army Base

Dear Mr. Townsend,

This office has reviewed the Supplemental Scope of Work, dated March 1, 1993, addressing the 5th quarter ground water sampling event, the work plan for soil/water investigations at tank site 18, and the removal of free product from the wells. This scope of work is acceptable to this office.

Additionally, the required Tank Closure Report, detailing the tank removal, tank condition, amount of soil excavated, etc., for Tank Site 18 is past due. You are required to submit this report within 30 days of the date of this letter. This is our third request for this report. Any extensions of the due date must be approved by this office or RWQCB.

Please be reminded that per a recent letter from the County, dated February 24, 1993, you are required to submit a work plan addressing the further delineation of the ground water contaminant plume of a number of the tank sites by April 15, 1993. Any extensions of the due date must be approved by this office or RWQCB.

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

orucer eral

Juliet Shin

Hazardous Materials Specialist

Mr. Paul Townsend Re: Oakland Army Base March 5, 1993 Page 2 of 2

cc: Richard Hiett, RWQCB

Glenna M. Eiermann Department of the Army Military Traffic Management Command HQ, Western Area, Oakland Army Base Oakland, CA 94626-5000

H.S. Leite
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

Nels Johnson SCS Engineers 6761 Sierra Court, Ste D Dublin, CA 94568

Paul Smith, Alameda County Hazardous Materials Division Edgar Howell-File(JS)

DAVID J. KEARS, Agency Director



R0876

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

March 2, 1993

Mr. Paul Townsend Oakland Army Base 1325 J St., 12th Floor Sacramento, CA 95814-2922

STID 2056

Re: Tank Sites A, D, and F, at the Oakland Army Base

Dear Mr. Townsend,

This office has received your letter and attachments, dated February 24, 1993, regarding the former uses of Tanks "A", "D", and "F". The information provided does strongly suggest that these underground storage tanks were used for the storage of heating oil. Therefore, this office will not require you to analyze future samples collected from these tank sites for the array of "unknown tank" constituents, as outlined in Table 2 of RWQCB's Staff Recommendations for the Evaluation and Investigation of Underground Storage Tanks.

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

Sincerely

Juliet Shin

Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Glenna M. Eiermann Department of the Army Military Traffic Management Command HQ, Western Area, Oakland Army Base Oakland, CA 94626-5000

H.S. Leite
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

Mr. Paul Townsend Re: Oakland Army Base March 2, 1993 Page 2 of 2

> Nels Johnson SCS Engineers 6761 Sierra Court, Ste D Dublin, CA 94568

Paul Smith, Alameda County Hazardous Materials Division Edgar Howell-File(JS)

### ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

DAVID J. KEARS, Agency Director



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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

February 24, 1993

Mr. Paul Townsend Oakland Army Base 1325 J St., 12th Floor Sacramento, CA 95814-2922

STID 2056

Re: Investigations at the Oakland Army Base

Dear Mr. Townsend,

Per our conversation on February 24, 1993, it appears that the extent of soil contamination at Tank Sites 7/8, "C", "D", "F", and "Q" can be determined by delineating the extent of the ground water contaminant plumes at these sites, since most, if not all, of the soil contamination lies within the capillary fringe. Therefore, as was stated in the County's January 15, 1993 letter to the Oakland Army Base, you will be required to submit a work plan addressing the further delineation of the ground water contaminant plumes at the above tank sites by April 15, 1993. Any extensions of this due date must be approved by this office or the California Regional Water Quality Control Board (RWQCB). Additionally, investigations to determine the extent of soil contamination at Tank Sites 11/12/13 and "A" will not be required at this time, on the conditions that the soil contamination observed at these two sites in the past will eventually be remediated, and that ground water monitoring continue on a quarterly basis at these sites.

In your letter, dated February 9, 1993, to this office, you requested that sampling of TK14 be discontinued if one additional quarterly ground water sample collected from this site does not identify contaminants. If one additional quarterly sample is collected and shown to contain no contaminants, than sampling of this well may be switched to annual monitoring.

Per RWQCB's guidelines, you are required to conduct a **Preliminary Site Assessment (PSA)** at TK18, to determine the extent and severity of ground water contamination which may have resulted from a release at the site. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB's <u>Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks</u>, the State Water Board's LUFT Manual, and be consistent with requirements

Mr. Paul Townsend Re: USTs at OAB February 24, 1993 Page 2 of 3

set forth in Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in RWQCB's Appendix A. The major elements of the quidelines include, but are not limited to, the following:

- o At least one ground water monitoring well must be installed within 10 feet of the observed soil contamination, oriented in the confirmed downgradient direction relative to ground water flow. In the absence of data identifying the confirmed downgradient direction, a minimum of three wells will be required to verify gradient direction. During the installation of these wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology.
- o Subsequent to the installation of the monitoring wells, these wells 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.

The PSA proposal is due within 60 days of the date of this letter. Once the proposal is approved, field work should commence within 60 days. 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".

Additionally, the Tank Closure Report, for the removal of the UST at TK18 is past due. You are required to submit this report within 30 days of the date of this letter.

Per the County's letter to the Oakland Army Base, dated January 15, 1993, you are required to analyze the next set of samples collected from TK7/8 for the waste oil constituents that were not analyzed for in the past. Additionally, in the January 1993 letter, this office requested that you submit the records and documentation indicating that cyanide and metal concentrations are commonly detected in areas around the Bay and that TKA, TKD, and TKF were used as heating oil tanks. To this date, this office has not received this information. You are required to submit this information within 30 days of the date of this letter. Along with these documents, you are required to submit Forms A and B for the tank removal at TK18.

Mr. Paul Townsend Re: USTs at OAB February 24, 1993 Page 3 of 3

Lastly, please be reminded to include details of the free product recovery work being conducted at the site in future reports.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Glenna M. Eiermann
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

H.S. Leite
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

Nels Johnson SCS Engineers 6761 Sierra Court, Ste D Dublin, CA 94568

Paul Smith, Alameda County Hazardous Materials Division

Edgar Howell-File(JS)

Oakland Army Base
O Alaska St. Oakland

RAFATALS ROSTG

(510) 271-4320

DEPARTM LOP, Closed 8 29 96 Hazardous 80 Swan V Oakland, CA 94621

February 8, 1993

Mr. Steve Worthington Branch Director Navy Public Works Center San Francisco Bay, Code 614 P.O. Box 24003 Oakland, CA 94623-1003 Utilities Building 441B

Re: Contamination at PWCSFB vehicle storage area beneath Grand Avenue Vehicle Storage Lot, Oakland Army Base, Oakland, CA 94626

Dear Mr. Worthington:

Alameda County Environmental Health Department (ACEH) has received and reviewed the Investigative Report, dated December 15, 1992, prepared by Brown and Caldwell Consultants (BCC). The report outlines soil samples collected from nine locations and groundwater grab samples collected from three locations. Significant contamination was detected in Boring B-1 at the surface level from Total Oil and Grease (TOG) at 12,000 ppm and total lead at 230 ppm. All other samples performed indicated relatively low levels of all contaminants sought.

Based upon the levels reported at the ground surface in the location of boring one a workplan needs to be prepared for review by this Agency which defines the lateral extent of the contamination in the area of B-1. The workplan should also specify a waste extraction test for lead to determine the amount of soluble metal present. This value should then be compared to the allowable soluble limit threshold concentration for lead specified in Title 22 of the California Code of Regulations, which is 5 ppm, to determine if hazardous waste levels are present. Soluble lead testing is required for both the over excavation clearance samples and also to characterize soil for disposal. Additionally, confirmation samples must also be performed for TOG. Please specify your intentions as to the issue of soil disposal depending on the outcome of lab analyses.

Please provide a workplan addressing the above concerns to this office within 30 days of the receipt of this letter.

Mr. Worthington February 8, 1993 page 2 of 2

If you have any questions regarding the content of this letter please do not hesitate to contact me.

Sincerely,

Paul m. Drim

Paul M. Smith Senior Hazardous Materials Specialist

cc:

David Recoder, Navy Public Works Center, San Francisco Bay, P.O. Box 24003, Code 710, Oakland, CA 94623-1003, Transportation Building #833

Glenna Eiermann, Department of the Army, MTMC, HQ, Western Area, Oakland Army Base, Oakland, CA 94626-5000

Richard Hiett, California Regional Water Quality Control Board, San Francisco Bay Region, 2101 Webster St., Oakland, CA 94612

Blair Troutman, Brown and Caldwell Consultants, 3480 Buskirk Ave., Pleasant Hill, CA 94523-4342

#### ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

DAVID J. KEARS, Agency Director

R0876

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

January 15, 1993

Greg Bridgestock Oakland Army Base 1325 J St., 12th Floor Sacramento, CA 95814-2922

STID 2056

RE: Comments on the January 6, 1993 Ground Water Monitoring Report for the Oakland Army Base (OAB)

Dear Mr. Bridgestock,

This office concurs with SCS's recommendation for re-excavation, treatment and/or disposal of impacted soils at Tank Sites 2, 3, 4/5, 7/8, 14, A, C, D, F, M, and Q. Additionally, according to Table 2 of the Chemical Data Aquisition Plan, Underground Storage Tank Site Investigation Report, dated June 27, 1991, there was 120 ppm diesel detected in soils at TK15 during the tank pull. Therefore, in addition to the above sites, you are required to address the soil contamination at TK15. Furthermore, it is assumed that the remediation of all excavated soil from TK11/12/13 is being addressed by the Mark Group consultants.

The extent of soil contamination at TK7/8, TK11/12/13, TKA, TKC, TKD, TKM, and TKQ needs to be further defined. Additionally, you are required to further define the extent of the ground water contaminant plumes at TK4/5, TK7/8, TKC, TKD, TKF, and TKQ by installing additional monitoring wells. A work plan addressing the further delineation of soil and ground water contamination shall be submitted to this office within 90 days of the date of this letter.

It is the understanding of this office that free product will be recovered from TKC by manually bailing twice a month, and from TKD and TKF by a passive free product recovery system. These methods are acceptable to this office. Please keep this office posted regarding the amounts of free product being bailed, the rate of product removal from TKD and TKF, and any changes in the frequency of free product removal from any of the three tank sites.

SCS proposed only one more round of ground water sampling for Tank Sites 1, 16, and 17. If, in fact, the next round of ground water samples collected from these wells do not identify any

Greg Bridgestock Re: Oakland Army Base January 15, 1993 Page 2 of 3

contaminants, than this office will consider these sites for closure. Continued quarterly ground water sampling and reporting is required for all of the other tank sites until they are ready for RWQCB "sign-off".

It is known that TK7/8 contained a waste oil UST, however, it appears that samples collected from this site were never analyzed for the whole array of waste oil constituents, listed in RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, Table 2. You are required to include the analysis for these constituents in the next round of samples collected from this site.

In SCS Engineer's (SCS) Ground Water Monitoring Report, dated January 6, 1993, SCS states that, based on conversations with Alameda County representatives, cyanide and metal concentrations are commonly detected in areas around the bay composed of fill material and of industrial and railway use. Please submit the records of conversations with Alameda County Representatives and any other piece of information that would adequately support the above statement.

Additionally, SCS states that review of the OAB records strongly suggests that TKA, TKD, and TKF were used as heating oil tanks. Please submit the OAB records that would support this statement.

Lastly, it is assumed that the underground storage tank recently removed from near Building 830 at the site, was formerly known as TK18. Please inform us as to whether we are correct in this assumption. Due to the fact that concentrations of hydrocarbons exceeding acceptable levels were identified in the ground water sample collected from the tank removal, further investigations will be required at the site. You are required to submit a work plan to this office addressing further investigations at this site. Additionally, it appears that Form B, for the removal of this tank, was never completed and submitted to this office. Please submit the completed form within 45 days of the date of this letter along with the information requested in the previous two paragraphs.

Mr. Greg Bridgestock Re: Oakland Army Base January 15, 1993 Page 3 of 3

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

Sincerely,

auliet Shin

Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Glenna M. Eiermann
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

H.S. Leite
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

Nels Johnson SCS Engineers 6761 Sierra Court, Ste D Dublin, CA 94568

Paul Smith, Alameda County Hazardous Materials Division

Edgar Howell-File(JS)

R0876

RAFAT A. SHAHID, Assistant Agency Director

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

December 29, 1992

H.S. Leite, Staff Engineer Office of Staff Engineer Military Traffic Command, HQ Western Area Oakland Army Base Oakland, CA 94626-5000

Re: Subsurface Investigation ASI Lease Site, Oakland Army Base, Oakland, CA 94626

Dear Mr. Leite:

This letter is in response to your December 16, 1992 correspondence which discusses omissions which you are requesting from the workplan which Industrial Compliance/ Southern Pacific is proposing to implement at the above site.

You have requested to defer further elaboration of the nature and extent of a possible metal contamination problem in soil and monitoring of groundwater for metals to a later date.

In the interest of expediting the definition and remediation of the petroleum contaminated areas approval is hereby granted for workplan implementation, with the inclusion of all applicable items previously specified in the October 28 and November 30, 1992 correspondence from this office.

As you are aware, the presence of metals were previously identified in an MK Environmental Report dated October 25, 1989. In this report levels of Cadmium as high as 16 ppm, Chromium as high as 140 ppm and Lead as high as 340 ppm were detected in soil samples collected at various locations of the above site. Because levels of each of these metals exceeded ten times the allowable soluble threshold limit concentrations (STLC) you are required to determine (via the Waste Extraction Test) (WET) whether these metals exceed the allowable stlc values specified in Title 22 of the California Code of Regulations (T22CCR).

It should be re-emphasized however that because levels of each of the above mentioned metals exceeded ten times the allowable STLC listed in T22CCR, Section 66261.20, this Department feels that it has already been established that significant levels of heavy metals have been identified which require further analyses and if necessary remediation.

H. S. Leite December 29, 1992 page 2 of 2

STLC testing will also be required, in each effected area, for excavated soils to determine whether soil must be handled as hazardous waste and for clearance samples which will indicate that hazardous soils have been removed.

Please address the above issue within 30 days of the receipt of this letter

Should you have any questions regarding the content of this letter please contact me at (510) 271-4320.

Sincerely,

Poul m. Lin

Paul M. Smith Hazardous Materials Specialist

cc:

Walter Floyd, Southern Pacific Environmental Systems, Inc. 9719 Lincoln Village Dr., Suite 310, Sacramento, CA 95827 Randall T. Smith, S.P. Transportation Co., Southern Pacific Building, 1 Market Plaza, San Francisco, CA 94105 Glenna Eireman, Military Traffic Command, HQ Western Area, Oakland Army Base, Oakland, CA 94626-5000 Greg Bridgestock, U.S. Army Corps of Engineers, Sacramento District, 650 Capitol Mall, Sacramento, CA 94814-4794 Richard Hiett, North Bay Toxics Division, SFRWQCB, 2101 Webster St., Fifth Floor, Oakland, CA 94612 Ed Howell-Alameda County Hazardous Materials -files

#### ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

DAVID J. KEARS, Agency Director

R0876

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

December 17, 1992

Lieutenant A.V. Scala Department of the Navy Naval Facilities Engineering Command P.O. Box 23300 Oakland, CA 94623-4003

STID 2056

RE: Response to the Navy's December 17, 1992 letter regarding Building 830, Oakland Army Base, Oakland, CA

Dear Ms. Scala,

The following are the questions listed in the December 17, 1992 letter to this office and the County's responses:

"1. When is ground water sampling necessary in tank removal actions? If adjacent soil sample results show non-detectable traces of contaminants, is groundwater sampling still required?"

According to California Regional Water Quality Control Board's Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, a water sample is always required to be collected and analyzed when it is observed in the tank pit, regardless of what concentrations were identified in the soil samples collected from beneath the tank or sidewalls of the tank pit.

"2. If there is insufficient groundwater available for testing when a tank is removed, should the tank owner continue excavations until sufficient groundwater is obtained?"

The RWQCB's guidelines does not specify any requirements for any particular amount of ground water being present for sampling. The guidelines just state that if ground water is present, then it shall be sampled.

"3. If groundwater samples are not tested at this time, what will the owner's responsibilities be in the future to continue compliance with environmental regulations?"

If no ground water samples are analyzed at this time, questions would arise later as to why groundwater samples were not collected and analyzed and whether the groundwater may have been impacted. In order for the regulating agencies to certify closure for the site, they would have to be shown that ground water was definitely not impacted. Therefore, eventually the

Ms. Scala RE: Oakland Army Base Building 830 December 17, 1992 Page 2 of 2

Oakland Army Base would most likely be asked to confirm that ground water was not impacted through further ground water investigations. Additionally, the sheen that was observed on the ground water in the tank pit at the time of the removal would prompt questions regarding ground water conditions beneath the former tank.

"4. If the groundwater samples taken on December 14, 1992 are tested, what minimum tests are required to satisfy the regulations?"

At this time, due to all the difficulties in collecting additional ground water samples, it is acceptable to this office to analyze the ground water samples that were collected on the day of the tank removal. Although an inadequate number of one-liter amber bottles were collected for the full range of analysis required for a waste oil tank, it will be acceptable to this office to conduct analysis for only diesel, oil and grease, semi-volatiles, and metals. Per a conversation between Stewart Podolski, WEST Laboratories, and myself on December 17, 1992, the above analysis are the only ones, out of the required analysis, that can be conducted with the limited amount of groundwater samples. Diesel and Oil & Grease would be this office's primary concern anyway since these were the only constituents detected in any of the soil samples.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

uca )

cc: Richard Hiett, RWQCB

Edgar Howell-File (JS)

R0876

RAFAT A. SHAHID, Assistant Agency Director

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

November 30, 1992

Mr. Walter Floyd Southern Pacific Environmental Systems, Inc. 9719 Lincoln Village Dr., Suite 310 Sacramento, CA 95827

Re: ASI Lease Site Subsurface Investigation Oakland Army Base

Dear Mr. Floyd:

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed your latest submittal, dated November 13, 1992. In this letter you respond to a conditional approval letter for further work at the above location. The approval letter issued by this office, dated October 28, 1992, expressed additional concerns and requirements necessary to the workplan prepared by Southern Pacific Transportation Company Industrial Compliance (SPTCO IC).

- Regarding the need for additional monitoring well(s) in locations where previous data indicated the presence of significant petroleum in soil/water. The (SPTCo IC) proposal to install additional wells after soil remediation is acceptable.
- 2) The stockpile sampling frequency and methodology specified in the September 11 workplan and November 12 clarification letter are acceptable providing that when analyzing these and all other soil and water samples that benzene, toluene, ethylbenzene and toluene are also included.
- 3) Regarding the issue of whether groundwater in each well should be sampled for the presence of cadmium, chromium, and lead the rationale presented by SPTCo IC was that levels encountered in the soil were background levels, metal contamination identified at the sites were far from the areas formerly impacted by activities associated with ASI/Herson trucking.

The argument that areas in which significant metals were identified were in unimpacted areas in untrue. This Division considers levels exceeding ten times the soluble threshold limit concentration (stlc) specified in the California Code of Regulations (CCR) to warrant further elaboration in order to determine whether the allowable soluble levels have been exceeded.

Mr. Floyd November 30, 1992 page 2 of 2

Whether metal contamination occurred from activities associated with Herson/ASI is unknown. This Agency is attempting to oversee the cleanup of all aspects of contamination at the approximately 12 acre site. If SPTCO IC feels that contamination levels encountered at the site are not related to activities associated with ASI/Herson this issue should be taken up with the property owner Oakland Army Base. Whether the contamination was caused by Herson/ASI or previous Oakland Army base activity is irrelevant in determining whether hazardous waste levels occur in soil or groundwater beneath the site.

It is my understanding that over excavation and soil removal occurred in each area where significant levels of metals were detected. In order to determine whether these areas contain significant soluble levels of Cd, Cr and Pb, you are required to perform a soluble metals test on soil beneath each area excavated. Additionally, stockpiled soils from each location where metals were detected need to be analyzed for soluble metals.

In a facsimile transmission to Randall Smith of SP I recently attempted to clarify the need for additional Divisional regulatory oversight fees of \$ 1500.00 from that originally requested from SPTCo. I also provided Randall with copies of the deposit/refund account sheets. Unless I hear further from either Randall or yourself I will assume that the issue regarding billing has been resolved.

If you have any questions regarding the content of this letter please direct them to me at (510) 271-4320.

Sincerely, Paul

Paul M. Smith

Hazardous Materials Specialist

cc:

Randall T. Smith, S.P. Transportation Co., Southern Pacific Building, 1 Market Plaza, San Francisco, CA 94105
Glenna Eireman/ Col. Walterhouse, Military Traffic Command, HQ, Western Area, Oakland Army Base, Oakland, CA 94626-5000
Greg Bridgestock, U.S. Army Corps of Engineers, Sacramento District, 650 Capitol Mall, Sacramento, CA 94814-4794
Richard Hiett, North Bay Toxics Division, SFRWQCB, 2101
Webster St., Fifth Floor, Oakland, CA 94612
Ed Howell-Alameda County Hazardous Materials -files

R0876

RAFAT A. SHAHID, Assistant Agency Director

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

November 10, 1992

Ms. Glenna Eiermann
Environmental Engineer
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, California 94626-5000

Re: Subsurface Contamination detected in soil adjacent to Building 807, Oakland Army Base, Oakland, CA 94526

Dear Ms. Eiermann,

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed the analytical data collected October 15, 1992. You had informed me by telephone that recently several borings associated with the construction of a building next to Building 807 were installed. When performing one of these borings the presence of a strong organic odor was encountered. Samples were collected in this area and analyzed. The analytical data which you have provided to me indicates the presence of 11 parts per million (ppm) methylene chloride, 13 ppm chloroform, 205 ppm trichloroethene, 28 ppm acetone, 175 ppm hexachlorethene, 1120 ppm di-n-butyl phthalate and 341 ppm butyl benzyl pthlate.

Based upon the above contaminant levels further investigation of the nature and extent of the above contamination is necessary. Analytical data provided to this office does not specify the location which the sample was collected from, the depth of the sample collection nor does it contain a narrative description or site maps indicating the site layout.

You are required to submit to this office for review a work plan. The plan must address a site history and layout and include measures to delineate the lateral and vertical extent of subsurface contamination. A copy of Appendix A, taken from the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, has been provided as a guidance document for the preparation of the work plan.

Based upon the levels of contamination encountered and the high water table beneath the site a groundwater investigation is required in order to determine whether groundwater has been impacted. Depending on the outcome of the subsurface investigation, monitoring wells will be required at this location.

Ms. Eiermann November 10, 1992 page 2 of 2

Finally, a deposit/refund account for this project has not been previously established. Alameda County is authorized in Ordinance Code Section 3-141.6 to charge fees for the regulatory oversight of site mitigation cases such as this one. You are requested to submit a check for \$ 700.00 made payable to County of Alameda to initiate work on this case. An account will be established and billed against at a rate of \$ 71.00 per hour. Any unused portion of this fee will be returned to you at the completion of the project.

If you have any questions please feel free to contact me at (510) 271-4320.

Sincerely,

Paul M. Shrish

Paul M. Smith Senior Hazardous Materials Specialist

Enclosure (1)

cc:

Greg Bridgestock, U.S. Army Engineering District, Sacramento CESPK-ED-E, DERP, Sacramento, CA 95814

Lester Feldman, San Francisco Regional Water Quality Control Board, 2101 Webster St, Suite 500, Oakland, CA 94612

Edgar Howell, HazMat Div. Chief- files

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

RAFAT A. SHAHID, Assistant Agency Director

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

October 28, 1992

Mr. Walter Floyd Southern Pacific Environmental Systems, Inc. 9719 Lincoln Village Dr., Suite 310 Sacramento, CA 95827

Re: ASI Lease Site Subsurface Investigation Oakland Army Base

Dear Mr. Floyd:

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed the work plan submittal dated September 11, 1992. The work plan proposes the installation of a maximum of 10 borings and 4 monitoring wells. The plan states that only the number of borings as are necessary to assess the lateral extent of impacted soil will be drilled.

The work plan is acceptable with the inclusion of the following items:

- 1) An examination of data surrounding the undercoating building (borings A8, A9, A10, A11, A14, A16, A17) indicates Total Petroleum Hydrocarbon (TPH) concentrations in grab groundwater samples as high as 570 ppm. Based upon contamination levels detected in both soil and groundwater grab samples the installation of additional groundwater monitoring wells in this area are necessary to properly indicate water quality at this location. Please submit a work plan outlining the additional proposed wells in this area.
- 2) The workplan specifies that four stockpile samples will be collected and composited into one in the laboratory however the plan does not mention the volume of the stockpile soils currently present at the site or the volume anticipated during the next phase of proposed boring/monitoring activity on site. If it is Southern Pacific Transportation Company's (SPTCo) intention to leave stockpiled soil material on site you are required to collect four samples per each 20 cubic yards and composite them into one sample, in the laboratory, for analysis.
- 3) Soil samples collected at the site on September 26, 1989 indicated total metal concentrations for Cadmium, Chromium and Lead exceeding ten times the allowable California Code of Regulations (CCR) Title 22 soluble threshold limit concentration. For this reason when analyzing the first round of groundwater samples in each monitoring well you are required to monitor for the presence of these metals. If upon initial analysis of these metals no amounts of these metals are detected, future

Mr. Floyd October 28, 1992 page 2 of 2

monitoring for them can be discontinued.

- 4) The work plan states that if TPH concentrations are less than 10 mg per kg that stockpiled soil will either be redistributed on site or transported to the SPTCo Desert Yard. Additionally, you are required to also analyze soil for benzene, toluene, xylene and ethylbenzene using either method 8020 or 8240. If detectable levels of benzene are present, on site disposal will not be permissible.
- 5) Please discuss the disposition of all drums and stockpiled materials currently on site. In the future reports to this office include copies of documentation regarding their characterization and ultimate disposition.
- 6) Finally, a review of the deposit refund account status for the ASI lease site indicates that the funds initially submitted for are nearly depleted. Please remit an additional \$ 500.00 made payable to the County of Alameda. The deposit refund mechanism is authorized by Alameda County Ordinance 3-141.6.

If you have any questions regarding the content of this letter please direct them to me at (510) 271-4320.

Sincerely,

Paul m. Luix

Paul M. Smith Hazardous Materials Specialist

CC

Randall T. Smith, S.P. Transportation Co., Southern Pacific Building, 1 Market Plaza, San Francisco, CA 94105
Glenna Eireman/ Col. Walterhouse, Military Traffic Command, HQ, Western Area, Oakland Army Base, Oakland, CA 94626-5000
Greg Bridgestock, U.S. Army Corps of Engineers, Sacramento District, 650 Capitol Mall, Sacramento, CA 94814-4794
Richard Hiett, North Bay Toxics Division, SFRWQCB, 2101
Webster St., Fifth Floor, Oakland, CA 94612
Ed Howell-Alameda County Hazardous Materials -files

### ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

DAVID J. KEARS, Agency Director

R0876

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

October 22, 1992

Greg Bridgestock Oakland Army Base 1325 J St., 12th Floor Sacramento, CA 95814-2922

STID 2056

RE: Additional sampling analysis requirements at the Oakland Army Base, Oakland, California

Dear Ms. Eiermann,

In the meeting between the County and the Oakland Army Base (OAB), on September 24, 1992, the County representatives brought up the issue that ground water samples being collected from certain tank sites were not being analyzed for constituents that were identified at the site in the past. Additionally, some of the former waste oil tank sites were never analyzed for the whole array of contaminant constituents required in Table 2 of the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks.

Since the meeting, this office has further discussed this problem and has reviewed the files to determine exactly which tank sites are deficient in sample analysis. According to our files, these sites have been determined to be tank sites 3, 7/8, and 14. Total Oil and Grease (TOG) was identified in a soil sample collected from tank site 3 in 1990, however, no additional samples from this site were ever analyzed for TOG. Samples collected from tank sites 7/8 and 14 have identified TOG in the past, however, subsequent samples were not analyzed specifically for TOG (only EPA Method 418.1 was used, which is too general). Additionally, tanks 7/8 and 14 were labeled as waste oil tanks, however, samples collected from these areas were never analyzed for chlorinated hydrocarbons or PCB, PCP, PNA, or creosote, which are required to be analyzed for under RWQCB's guidelines.

This Department is requiring that analysis for the above additional constituents be included in the next round of quarterly sampling for tank sites 3, 7/8, and 14. If these constituents (TOG, PCB, PCP, PNA, and creosote) are not detected in this next round of ground water samples, then you will not be required to conduct further analysis for them in future sampling efforts.

Mr. Greg Bridgestock RE: Oakland Army Base October 22, 1992 Page 2 of 2

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In response to a request from the County to include analysis for all constituents related to unknown tanks for tank sites A, D, and F, OAB stated that there might actually be some information in their site files to indicate exactly what these tanks stored. If adequate information is not obtained to show what these tanks were used for, the County will require that OAB go ahead and analyze for all the constituents for unknown tanks listed in RWQCB's guidelines.

Per the September 24, 1992 meeting, you requested that OAB be given a conservative estimate of the dollar amount that the State would ultimately bill the site for L.O.P. time for the coming year. Considering that the OAB site is very large and complicated, it was estimated that OAB would be charged \$ 2,000 to \$ 3,000 for L.O.P. time in the coming year.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Thin

Glenna M. Eiermann Department of the Army Military Traffic Management Command HQ, Western Area, Oakland Army Base Oakland, CA 94626-5000

H. S. Leite
Department of the Army
Military Traffic Management Command
HQ, Western Area, Oakland Army Base
Oakland, CA 94626-5000

Paul Smith, Alameda County Hazardous Materials Specialist

Edgar Howell-File(JS)

#### ALAMEDA COUNTY **HEALTH CARE SERVICES** AGENCY

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

R0876

(510) 271-4530

DAVID J. KEARS, Agency Director

August 25, 1992

Greg Bridgestock Oakland Army Base 1325 J St., 12th Floor Sacramento, CA 95814-2922

STID 2056

Investigations at Oakland Army Base, Alaska St., Oakland, RE: California 94626

Dear Mr. Bridgestock,

The case file for the site has been reassigned to another Hazardous Materials Specialist, Juliet Shin. Please forward future correspondence to her attention.

This office has reviewed the Quarterly Sampling Report, dated June 1992, for the above site. According to the report, floating product was observed in Wells MW-42, MW-16, and MW-17, at Tank Sites C, D, and F. According to the phone conversation between Juliet Shin and Nels Johnson, SCS Engineering, the three monitoring wells will be manually bailed once a week, until the floating product is reduced down to sheen, for three successive weeks. After this, the bailing will be conducted once a month. Greater efforts are required to be made to contain and remove this floating product plume. You are required to submit a work plan within 60 days of the receipt of this letter addressing the delineation, containment, and removal of both the separate and dissolved phases of hydrocarbon contamination in the ground water at Tank Sites C, D, F, 4/5, M, and Q.

Additionally, two of the Tank Sites with free floating product, Tank Sites D and F, in addition to Tank Site A, involved tanks storing unknown constituents. It appears that soil and ground water samples collected from around these tanks were only analyzed for TPH and BTEX using EPA Methods 8015 and 8020. However, according to the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, these samples should also have been analyzed at least once for Oil and Grease, chlorinated hydrocarbons, Cd, Cr, Pb, Zn, Ni, and PCB, PCP, PNA, and creosote. Therefore, you will be required to analyze the free floating product at sites D and F, and future soil and ground water samples associated with the above three tanks, for the above constituents that were not analyzed for in the past. If none of these additional contaminants are detected in the samples, you may discontinue the analysis for these constituents.

Greg Bridgestock Re: Oakland Army Base August 25, 1992 Page 2 of 4

According to the report, there are 12 tank sites at which hydrocarbon-contaminated soil exceeding 100 ppm was detected from inside the tank pit. The excavated soil from these 12 sites was apparently placed back into the tank pits on a visqueen cover. "Disposal" of contaminated soil in this fashion is unacceptable. Such soil must be remediated and/or properly disposed of at a licensed facility. You are required to submit a work plan addressing your plans for this contaminated soil within 45 days of the receipt of this letter.

If these soils are to be aerated and disposed of off site, the Bay Area Air Quality Management District's Regulation 8, Rule 40, states that one composite soil sample should be collected and analyzed for every 50 cubic yards. If these soils are to be disposed of on site, the California Regional Water Quality Control Board's guidelines state that one discreet soil sample must be collected for every 20 cubic yards.

Soil contamination from areas other than the tank pit was identified from soil borings at Tank Sites 7/8, 11/12/13, 15, A, C, D, F, M, and Q. Per the conversation between Juliet Shin and Nels Johnson on August 24, 1992, there are no current plans to delineate the vertical or lateral extent of the elevated concentrations of this soil contamination, due to the fact that the soil samples were collected at or immediately above the water table. However, you are required to eventually address this soil contamination problem either separately or along with the required ground water investigations and remediation.

In September 1991, six Background Borings were installed and sampled along the perimeter of the site, as part of the subsurface investigation work conducted for the site's underground storage tanks. According to the lab analysis results, soil samples collected from five of the six borings exhibited cyanide concentrations, as high as 15.1 ppm. Additionally, ground water samples collected from three of the Background Borings exhibited cyanide concentrations, as high as The discharge limit for cyanide, according to the Shallow Water Effluent Limits given for permitted discharge into the Bay is 1 ppb. You are required to address the cyanide contamination at the site. Please submit a work plan, within 45 days of the receipt of this letter, that will address the extent and severity of this cyanide contamination, and its subsequent containment and remediation. Additionally, you are required to conduct a search for any historical or current activities at the site that would have involved the use and/or disposal of cyanide and submit the information to this office.

Greg Bridgestock
Re: Oakland Army Base
August 25, 1992
Page 3 of 4

Please be reminded that, per Section 2652 (d), Title 23 California Code of Regulations, the owner or operator shall submit reports to the regulating agency every 3 months or at more frequent intervals, until the investigation and cleanup are complete.

Additionally, this office has never received any Closure Reports for the removal of the underground storage tanks (USTs). A Tank Closure Report consists of a narrative discussion of the activities associated with the closure of the USTs, site and tank location maps, chain-of-custody, analytical results, manifests, and QA/QC, among other things. If available, please submit a copy of this report to this office.

Three tank sites, TK1, TK16, and TK17 were recommended for closure in the most recent report. Closure for these sites needs to be formally requested. The topics that need to be addressed in the Closure Recommendation are given in the attached list, titled "Letter of Recommendation for UST Case Closure".

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, at the San Francisco Region-Water Quality Control Board, on all correspondence and reports.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Nels Johnson SCS Engineers 6761 Sierra Court, Ste. D Dublin, CA 94568 Greg Bridgestock Re: Oakland Army Base August 25, 1992 Page 4 of 4

> Petroleum Engineering, Inc. 11 West Ninth Street Santa Rosa, CA 95401

Glenna M. Eiermann Department of the Army Military Traffic Management Command HQ, Western Area, Oakland Army Base Oakland, CA 94626-5000

Colonel Walterhouse Dept. of the Army MTMC HQ, Western Area, Oakland Army Base Oakland, CA 94626-5000

Paul Smith, Alameda County Hazardous Materials Specialist Edgar Howell-File (JS)



RAFAT A. SHAHID, Assistant Agency Director

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

April 7, 1992

Mr. Walter Floyd Southern Pacific Environmental Systems, Inc. 9719 Lincoln Village Dr., Suite 310 Sacramento, CA 95827

Re: ASI Lease Site Subsurface Investigation Oakland Army Base

Dear Mr. Floyd:

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed the work plan addendum, dated March 5, 1992. The addendum was prepared in response to an earlier February 25th, 1992 letter from this office in which four issues regarding the proposed work plan were raised.

Upon review of the Health and Safety plan included with the addendum it is noted that no on-site monitoring is proposed. You are required to monitor, with an appropriate instrument, at some frequency, in order to determine if permissive exposure levels (PELs) are exceeded for petroleum hydrocarbons, particularly benzene. If PELs are exceeded an appropriate decision can then be made as to whether respiratory protection is either feasible or necessary.

The work plan as proposed is hereby approved with the inclusion of the above requirement. Please contact this office in advance of the initiation of field activities at the site so that if possible a representative from this office can be present for some phase of the proposed work.

Should you have any questions regarding the content of this letter please contact me at (510) 271-4320.

Sincerely:

Paul m. Shilk

Paul M. Smith Hazardous Materials Specialist

cc:

Randall T. Smith, S.P. Transportation Co., Southern Pacific Building, 1 Market Plaza, San Francisco, CA 94105 Col. Walterhouse/Glenna Eiremann/David Gilman, Oakland Army Base, U.S. Army Garrison, Oakland, CA 94626-5000 Mr. Floyd April 7, 1992 page 2 of 2

> Greg Bridgestock, U.S. Army Corps of Engineers, Sacramento District, 650 Capitol Mall, Sacramento, CA 94814-4794 Lester Feldman, North Bay Toxics Division, RWQCB, 2101 Webster St., Oakland, CA 94612 Howard Hatayama, Department of Toxic Substances Control

R0876

RAFAT A. SHAHID, Assistant Agency Director

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

February 25, 1992

Mr. Walter Floyd Southern Pacific Environmental Systems, Inc. 9719 Lincoln Village Dr., Suite 310 Sacramento, CA 95827

RE: ASI Lease Site on Oakland Army Base

Dear Mr. Floyd:

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed the Workplan Revisions letter dated January 20, 1992 for the ASI Lease site located on an approximately 20 acre site on the Oakland Army Base. The workplan proposes to complete 6 additional borings in order assess the lateral and vertical extent of the hydrocarbon contamination previously identified in the vicinity of the car wash facility.

Prior to workplan approval you are required to address the following issues:

- 1) Provide a Health and Safety Plan from the contractor/consultant performing the work which contains the name of the site security officer, name, address and phone number of a nearby medical facility, list of personal protective equipment available for workers at the job site.
- 2) Provide a description of the site security measures taken during the borings and subsequent excavation at the car wash facility.
- 3) You are required to specify the name and certification number of the analytical laboratory performing the analysis of the boring samples.
- 3) The workplan specifies that 6 borings will be advanced to a depth to 4 feet below ground surface. If groundwater is not encountered at the 4 foot depth, will the boring be advanced to the depth where groundwater can be collected?

Mr. Floyd February 25, 1992 page 2 of 2

Once the workplan has been approved you are requested to provide this office with advance notification of work commencement, so that if possible a representative can be present to observe the activity at the above site.

Please be advised that once the soil contamination delineation and removal phase has been completed an additional required phase entails the preparation and approval of a workplan outlining proposed locations of groundwater monitoring wells in order to determine possible impact to groundwater.

It is noted on the Workplan revision carbon copy list that the Regional Water Quality Control Board has not been included for all correspondence regarding this site. You are again directed to provide a copy of correspondence to:

Lester Feldman San Francisco Regional Water Quality Control Board 2101 Webster St., 5th Floor Oakland, CA 94612

If you have any questions regarding the content of this letter please direct them to me at 510/ 271-4320.

Sincerely:

Pour m Link

Paul M. Smith Hazardous Materials Specialist

cc:

Randall T. Smith, SP Transportation Co., Southern Pacific Building, 1 Market Plaza, San Francisco, CA 94105 Col. Walterhouse/Glenna Ireman/ David Gilman, Oakland Army Base U.S. Army Garrison, Oakland CA 94626-5000 Greg Bridgestock, U.S. Army Corps of Engineers, Sacramento District, 650 Capitol Mall, Sacramento, CA 94814-4794

Gil Jensen, Alameda County District Attorney's Office 7677 Oakport St., Oakland, CA 94621

Lester Feldman, SFRWQCB Howard Hatayama, DHS



December 18, 1991

Mr. Steve Worthington Navy Public Works Center San Francisco Bay Environmental Engineering Code 613/614 Oakland, CA 94623

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

Re: Contamination at PWCSFB vehicle storage area, Oakland Army Property

Dear Mr. Worthington:

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed the Work Plan Amendment which you have prepared, dated December 9, 1991.

The proposed Work Plan is approved conditional upon the following:

- When performing sampling analysis in addition to the sampling 1) specified on page 4 item C(4), you are also requested to analyze each sample for the presence of Total Oil and Grease.
- You are required to provide this office with the Site Safety Plan prepared by the Consultant/ Contractor which you have selected to implement the Work Plan.
- You are requested to notify this office with as much advance notice as possible so that if possible a representative from this office can be present to witness some phase of the work at the above location.
- Upon completion of the work you are required to provide a report which shall include a narrative description of the soil removal, characterization and disposal activities which were undertaken to address the subsurface contamination.

Please be advised that copies of any information relating to site characterization or remediation should also be submitted to the San Francisco Regional Water Quality Control Board (SFRWQCB) because they have the ultimate site sign off authority for this site.

Should you have any question pertaining to any of the above requests please contact me at 510 271-4320.

Sancerely / tank m, showik Paul M. Smith

Hazardous Materials Specialist

cc:

David Recoder, Department of the Navy Glenna Eiermann, Department of the Army Lester Feldman, SFRWQCB Charlene Williams, DHS Gil Jensen, Alameda County District Attorney's Office

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

R0876

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

November 5, 1991

Mr. Walter Floyd Southern Pacific Environmental Systems, Inc. 9719 Lincoln Village Dr., Suite 310 Sacramento, CA 95827

RE: ASI Lease Site on Oakland Army Base

Dear Mr. Smith:

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed the Soil and Preliminary Investigation Report, Oakland Army Base/ ASI Lease Site and also the Site Remediation Plan prepared by S.P. Environmental Systems.

The report outlines results of a subsurface investigation which was conducted to evaluate possible contamination at specific locations over the above approximately twenty acre site. The report indicated subsurface contamination from petroleum compounds at four locations on the property at levels as high as 650 ppm Total Petroleum Hydrocarbons in the diesel range (TPHd) in soil and 460 ppm TPHd in grab samples taken from ground water.

The Remediation Plan proposes to undertake 2 phases which include further delineation of the areas of contamination and removal of some impacted soil.

The following issues require clarification prior to work plan approval.

- 1) The Remediation Plan states that soil from the exploratory trenches will be used to backfill the trenches. You are requested to specify the sampling protocol to be employed in properly characterizing this material. The Regional Water Quality Control Board's guidance document the Tri-Regional Recommendations specify the frequency of: one composite sample collected from four locations per each 20 cubic feet of stockpiled soil is required where stock piled soil is returned to the excavation.
- 2) You are requested to specify the storage locations of all stockpiled soils onsite, including those proposed to be excavated and to specify whether the material excavated from different areas will be combined or separated.
- 3) You are requested to specify the sampling frequency for confirmation samples performed within the proposed trenches. A typical sampling frequency would be one sample collected per each 20 lineal feet, however more frequent sampling may be necessary to properly delineate the extent of soil contamination.

Mr. Floyd November 5, 1991 page 2 of 2

- 4) You are requested to specify the extent of over excavation that will occur of the areas where contamination has been previously determined. These areas include the area of the undercoating building and the area in front of the car washing facility.
- 5) Please specify the specific chemical analyses which will be performed on any soil and water samples which are collected from the trenching and stockpile activities at the above location.
- 6) You are requested to address the above issues prior to initiating further activity at the site. Once the above issues are rectified you are requested to provide this office with advance notification of work commencement, so that if possible a representative can be present to observe the activity at the above site.

Please also submit copies of all technical reports to the Regional Water Quality Control Board. Their new address is:

Lester Feldman San Francisco Regional Water Quality Control Board 2101 Webster St., 4th Floor Oakland, CA 94612

If you have any questions regarding the content of this letter please direct them to me at 510/271-4320.

Sincerely:

Part m. Brute

Paul M. Smith Hazardous Materials Specialist

cc:

Randall T. Smith, SP Transportation Co., Southern Pacific Building, 1 Market Plaza, San Francisco, CA 94105
Col. Walterhouse/Glenna Ireman/ David Gilman, Oakland Army Base U.S. Army Garrison, Oakland CA 94626-5000
Larry Bergmooser, U.S. Army Corps of Engineers, Sacramento District, 650 Capitol Mall, Sacramento, CA 94814-4794
Gil Jensen, Alameda County District Attorney's Office 7677 Oakport St., Oakland, CA 94621
Lester Feldman, SFRWQCB
Howard Hatayama, DHS



March 28, 1991

Mr. Randall T. Smith Southern Pacific Transportation Company Southern Pacific Building One Market Plaza San Francisco, CA 94105 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

RE: Proposed Phase 1 Workplan for ASI Lease Site on Oakland Army Base

Dear Mr. Smith:

This conversation is regarding our telephone conversation on February 20, 1991 pertaining to the above location. After discussing the particulars of the above case with Lester Feldman of the Regional Water Quality Control Board (RWQCB) I was directed to request of you, prior to workplan approval, that in each area where borings are intended to sample soil to also request that groundwater samples be taken. This will provide us with some indication of the groundwater quality beneath this 20 acre site.

You are requested to acknowledge this request in writing within 14 days of the receipt of this letter. Also please notify this department when the work is scheduled to be performed.

If you have any questions please feel free to reach me at 415/271-4320.

Sincerely,

Pane m. Shrink

Paul M. Smith Hazardous Materials Specialist

cc:

Col. Russell/Michael Williams, Oakland Army Base Gil Jensen, Alameda County District Attorney's Office of Consumer and Environmental Protection.

Lester Feldman, SFRWQCB Howard Hatayama, DHS

R0876

March 19, 1991

Certified Mailer #P 062 127 979

Colonel Jay S. Russell Commanding Officer Department of the Army Military Traffic Management Control Headquarter Western Area Oakland Army Base Oakland, CA 94626-5000 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

Re: Contamination at PWCSFB vehicle storage area, Oakland Army Property

Dear Colonel Russell:

Alameda County Environmental Health Department has received and reviewed the analytical results of soil sampling and removal from under the Grand Avenue bridge located on the Oakland Army Base property. Although there is no indication in the January 4, 1991 soils report as to where the samples were taken, results indicated a concentration of 10,000 ppm of Total Petroleum Hydrocarbons (TPH).

After conferring with the Regional Water Quality Control Board you are required to install a monitoring well beneath the formerly contaminated truck storage area in order to determine if groundwater has been impacted.

You are requested to submit a workplan to this office outlining the details of the well location, well installation, development, sample type, and sampling schedule and to this department within 45 days of the receipt of this letter.

Enclosed is a workplan format, Section IV of this format focuses on plan criteria for determining groundwater contamination. Should you have any question pertaining to the above request please contact me at 415/271-4320.

Sincerely,

Paul m. Shelt

Paul M. Smith

Hazardous Materials Specialist

Enclosures (1)

CC: Larry McEwen, Department of the Navy
Michael Williams, Department of the Army
David Recoder, Department of the Navy
Lester Feldman, SFRWQCB
Charlene Williams, DHS
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Affairs
Rafat A. Shahid, Assistant Agency Director, Alameda County
Environmental Health Department

R0876

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

January 30, 1991

Certified Mailer #P 062 127 761

Colonel Jay S. Russell Commanding Officer Department of the Army Military Traffic Management Control Headquarter Western Area Oakland Army Base Oakland, CA 94626-5000

Re: Contamination at PWCSFB vehicle storage area, Oakland Army Property

Dear Colonel Russell:

It has recently come to my attention that a remediation of subsurface contamination is currently underway by the Department of Navy located at the PWCSFB vehicle storage area, underneath the West Grand overpass located on Oakland Army Base.

Alameda County Environmental Health Department, Hazardous Materials Division has currently been delegated authority from the San Francisco Regional Water Quality Control Board (SFRWQCB) to oversee a large number of remediation cases within Alameda County. We will be the lead contact agency for the oversight duties with regard to this case. We therefore request information which should include but not be limited to technical information such as workplans describing proposed investigative or mitigative work at this site, or workplans describing any activities which have been completed in the past.

All work must be performed according to RWQCB documents:

Regional Board Staff recommendations for Initial Evaluation and Investigation of Underground Storage Tanks 2 June 1988, revised 10 August 1990.

see Appendix A (enclosure) for above 1 July 1988, amended 3 April 1989.

You are also requested to submit a deposit of \$500.00 made payable to the County of Alameda, for involvement in their oversight responsibilities for the cleanup of the above site. This deposit is authorized by Section 3-141.6 of the Ordinance Code of Alameda County

Colonel J. Russell January 29, 1991 Page 2 of 2

and is used to cover the expenses incurred by County personnel in their oversight duties. Records are maintained of the time County employees commit to a project and the deposit is charged at an hourly rate. Upon the completion of the project, the balance will be returned to you.

It is my understanding from a facsimile transmission and a subsequent phone conversation with Michael Williams that site investigation and cleanup may have already been initiated at this site.

Please submit to this office information pertaining to any previously conducted or proposed investigation - remediation work done on the above site within 30 days of the receipt of this letter.

Copies of any information relating to site characterization or remediation should also be submitted to the San Francisco Regional Water Quality Control Board (SFRWQCB).

Should you have any question pertaining to any of the above requests please contact me at 415/ 271-4320.

Sincerely,

Your m. Shrink

Paul M. Smith Hazardous Materials Specialist

Enclosures (1)

cc:

Larry McEwen, Department of the Navy
Michael Williams, Department of the Army
Lester Feldman, SFRWQCB
Charlene Williams, DHS
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Affairs
Rafat A. Shahid, Assistant Agency Director, Alameda County
Environmental Health Department
File

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R0876

January 7, 1991

Mr. Randall T. Smith Southern Pacific Transportation Company Southern Pacific Building One Market Plaza San Francisco, CA 94105 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

RE: Proposed Phase 1 Workplan for ASI Lease Site on Oakland Army
Base

Dear Mr. Smith:

We have received and reviewed the revised workplan dated January 7, 1991 describing specific areas in which soil characterization will be conducted at the above location. The workplan as proposed is approved with the following conditions:

All soil and any water samples will be taken according to the CA Water Quality Control Boards LUFT manual protocol and analyzed by a state certified laboratory.

You are requested to notify this department of the date and time of the implementation of the workplan as early in advance of the event as is feasible.

A Phase 2 assessment should include a workplan to address any subsurface contamination found at the above site and the methodology for addressing it.

Please submit copies of laboratory results and technical reports to both the Regional Water Quality Control Board and to this office for review when they become available.

If you have any questions please direct them to me at 415/ 271-4320.

Sincerely:

Paul m. Druth

Paul M. Smith Hazardous Materials Specialist

cc:

Col. Russell/Michael Williams, Oakland Army Base
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Protection.
Lester Feldman, SFRWQCB
Howard Hatayama, DHS

15

September 24, 1990

Mr. Randall T. Smith Southern Pacific Transportation Company Southern Pacific Building One Market Plaza San Francisco, CA 94105 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

RE: Proposed Workplan for ASI Lease Site on Oakland Army Base

Dear Mr. Smith:

We have received the workplan dated September 5, 1990 which outlined the proposed scope of work for this site. Upon reviewing this plan and after consultation with the San Francisco Regional Water Quality Control Board (SFRWQCB) the following modifications / additions are requested:

The submission of a more detailed site map including a fixed reference point to identify the exact areas where samples had been taken in the past and are proposed to be taken in the future.

Upon inspection of the unpaved lot to the north of the paved car wash area several oil stained areas were encountered. You are requested to identify these areas on the map and to determine whether contamination is present. You are requested to develop a proposal which would address any contamination on this site which includes these stained areas.

SFRWQCB guidelines require the installation of groundwater monitoring wells when levels of soil contamination exceeds 100 ppm for Total Petroleum Hydrocarbons (TPH) and Oil and Grease (O&G). Once contaminated areas have been adequately defined a soil groundwater monitoring investigation can be developed to investigate the possibility of subsurface contamination.

Regarding the paved area near "pole 400" referred to in the proposed workplan which contains soft pavement. We disagree with the statement that this is not considered an area of potential subsurface contamination. Asphalt is a permeable material and the spillage of kerosene (Unocal 140) used to remove Cosmaline from Subaru motors prior to entering the auto car wash area for a period of eight years could exhibit a potential subsurface contamination. We request that sampling be performed in this area.

R. Smith September 24, 1990 Page 2 of 2

Soil samples collected from beneath the former above ground gasoline tank should be analyzed for TPH(g) and Benzene, Toluene, Xylene, and Ethylbenzene (BTX&E). Soil samples from all other locations should be analyzed for TPH(d) and BTX&E. If at anytime groundwater is encountered during excavation a representative water sample and analysis for TPH(g), TPH(d) and BTX&E is requested.

When submitting future documentation and reports to this office please also carbon copy the SFRWQCB

Attn. Lester Feldman Regional Water Quality Control Board 1800 Harrison Street Suite 700 Oakland, CA 94612

Please respond to the above requests prior to initiating investigative work at this site. Approval of the proposed workplan is contingent on the confirmation of the above modifications and the submission of a revised site map. Please contact me when a date and time has been scheduled for the excavation and sampling at this site. If you have any questions please contact this office at (415) 271-4320.

Sincerely,

Paul M. Smith

Faul m Smith

Hazardous Materials Specialist

cc:

Col. Russel/Michael Williams, Oakland Army Base
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Protection.
Lester Feldman, SFRWQCB
Howard Hatayama, DHS

September 6, 1990

Colonel Jay S. Russell
Commanding Officer
Department of the Army
U.S. Army Garrison
Military Traffic Management Control
Headquarter Western Area
Oakland Army Base
Oakland, CA 94626-5000

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

Attention: Michael Williams

RE: Contamination at the Automotive Services Imports Lease Site located on Oakland Army Base Property

Dear Colonel Russell:

We have received a recent proposed workplan dated September 5, 1990 prepared by Southern Pacific Transportation Company regarding the above site. In the Notice of Violation issued by this department dated June 5, 1990; pertaining to this location, we had requested along with a plan for remediation a deposit of \$ 500.00 for the services provided in the oversight of the site cleanup at the above location.

A deposit of \$500.00, made payable to the County of Alameda, will be required from the responsible party overseeing the cleanup of this site. This deposit is authorized by Section 3-141.6 of the Ordinance Code of Alameda County and is used to cover the expenses incurred by County personnel in their oversight duties Records are maintained of the time County employees commit to a project and the deposit is charged at an hourly rate. Upon the completion of the project, the balance will be returned to you.

Before the work proposal can be reviewed a deposit of the amount requested must be received by our office.

If you have any questions please contact me at (415) 271-4320.

Sincerely,

Paul m. Shith

Paul M. Smith Hazardous Materials Specialist

cc:

Lester Feldman, Regional Water Quality Control Board
Gil Jensen, Alameda County District Attorney's Office of
Environmental and Consumer Protection
Charlene Williams, Department of Health Services
Randall Smith, Southern Pacific Transportation Company
Michael Williams, Environmental Coordinator Oakland Army

R0876.

June 5, 1990

Certified Mailer # P 062 128 198

Commander Jay S. Russell
Colonel U.S. Army
Commanding Officer
Department of the Army
Military Traffic Management Control
Headquarter Western Area
Oakland Army Base
Oakland, CA 94626-5000

Attention: Michael Williams

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

### Notice of Violation

RE: Contamination at the Automotive Services Imports Lease Site located on Oakland Army Base Property

Dear Colonel Russell,
This letter is in regards to the site cleanup proceedings on property
owned by the Oakland Army Base; previously leased to Southern Pacific
and operated by Automotive Services Imports. Our office received a
copy of the phase 1 site assessment summary report dated October 25,
1989 prepared by M.K. Environmental Services regarding this site.

Prior to receiving the above report this department had not received any notification or background information from either Oakland Army Base, Southern Pacific or Automotive Services Imports of an intent to characterize or to remediate this site. The report has identified contaminant levels which are sufficiently high to constitute hazardous waste and will require further investigation into possible groundwater contamination.

This office will now be the lead agency overseeing both the soil and groundwater remediation of this site.

A deposit of \$500.00, made payable to the County of Alameda, will be required from the responsible party overseeing the cleanup of this site. This deposit is authorized by <u>Section 3-141.6</u> of the Ordinance Code of Alameda County and is used to cover the expenses incurred by County personnel in their oversight duties Records are maintained of the time County employees commit to a project and the deposit is charged at an hourly rate. Upon the completion of the project, the balance will be returned to you.

Colonel Russell Oakland Army Base Page 2 of 2

Before any additional work is to commence, you must to submit to this office a plan of correction for our approval. Your investigation - remediation plan must include, but shall not be limited to:

- 1. Background history on the site.
- 2. Methods that will be used to determine the lateral and vertical extent of contamination in the soil and groundwater.
- 3. Contaminates that will be tested for and locations from which sampling will occur at the site.
- 4. Schedule of the investigation remediation and an estimated time line for completion for each.

In addition, please submit all records pertaining to any previous investigation - remediation work done on the above site and the name and phone number of the contact person in charge of the remediation of this site.

Please respond to the request for the above information and deposit refund payment within 30 days of the receipt of this letter or by July 6, 1990. Questions pertaining to this case should be directed to Paul Smith, Hazardous Materials Specialist at (415) 271-4320.

Sincerely,

Edgar B. Howell III, Chief Hazardous Materials Division

gar B No well

PMS, EBH, pms

CC:

Lester Feldman, Regional Water Quality Control Board
Gil Jensen, Alameda County District Attorney's Office of
Environmental and Consumer Protection
Charlene Williams, Department of Health Services
John Moe, Southern Pacific Transportation Company
Michael Williams, Environmental Coordinator Oakland Army

18 April 1990

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

Steven Walker Petroleum Engineering, Incorporated 11 West Ninth Street Santa Rosa, CA 95401

Subject: Modification to Existing Underground Storage Tanks Numbers 6 and 10 at the Oakland Army Base.

Dear Mr. Walker:

This office has received and reviewed the proposal submitted by Petroleum Engineering concerning modifications to existing underground storage tanks number 6 and 10 at the Oakland Army Base. Further clarification is required before approval can be granted for the implementation of this project.

<u>Section 2641</u> of Title 23 of the California Code of Regulations specifies the seven monitoring alternatives available for underground storage tanks in the State of California. The option most commonly utilized is alternative FIVE which calls for a daily inventory reconciliation, the conduction of an annual precision test and continuous pipeline leak detectors for all pressurized product delivery systems.

According to the permit applications submitted to our office, Tank 10 has a pressurized delivery system and would therefore meet the requirement that a Red Jacket Detector or some comparable continuous pipeline leak monitor be installed prior to the granting of an operating permit by this agency. Your proposal to install a Veeder-Root TLS 250 inventory control system into Tanks 6 and 10 would not, of itself, constitute a sufficient leak monitoring program to meet the requirements of the California Code of Regulations.

In addition, all new piping installation associated with underground storage tanks must incorporate secondary containment. We in the Alameda County Department of Environmental Health, Hazardous Materials Division, require secondary containment for all piping be included in any updating of an existing underground storage tank if such piping must be exposed during the incorporating of any modifications to the tank system. If the piping systems of Tanks 6 and 10 are to be exposed during the installation of the Veeder-Root or pipeline leak detectors, than the installation of a secondary containment system would be called for.

Steven Walker
Petroleum Engineering, Inc.
11 West Ninth Street
Santa Rosa, CA 95401
Re. Tanks at the Oakland Army Base
18 April 1990
Page 2 of 2

The issues raised in this letter will have to be resolved before any approval can be granted for the implementation of your proposed work. If you have any questions or require further clarification concerning these matters, please contact me at (415) 271-4320.

Sincerely,

Dennis J. Byrne

Hazardous Materials Specialist

cc: Rafat Shahid, Assistant Director, Alameda County Department of Environmental Health Mike Williams, Oakland Army Base

R0876

April 13, 1990

Michael Williams
Oakland Army Base
Alaska Street, Building #1
Oakland, CA 94626

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

RE: Site Inspection at Oakland Army Base

Dear Mr. Williams,

On March 28, 1990, Larry Seto and Paul Smith of the Alameda Co. Environmental Health Department, Hazardous Material Division inspected your facility. During this inspection the following violations were noted:

The following items pertain to Building 99:

- 1) You are requested to investigate possible contamination via an open hole in the ground to an unknown depth. This hole is located outside of the building underneath waste oil container #2. If contamination is found clean up is necessary.
- 2) The fenced in hazardous material/ hazardous waste storage area outside of building 99 contains some vessels containing grease and solvents. According to section 67243(a) of Title 22 of the California Code of Regulations (CCR) you are required to close uncovered containers when they are not in use.
- 3) Upon inspection it was discovered that the outside fenced in hazardous materials storage area currently slopes towards the storm drain. A secondary containment berm needs to be installed around this area.

It was noted that there are several hazardous waste accumulation points throughout the complex for the purpose of containing damaged solvents and oil drums. Other areas were for the purpose of containing hazardous materials used to service vehicles. At one particular service area several 55 gallon drums are being stored on their sides. Many of the drums have pour spouts attached to them which occasionally leak. The catchment area for these leaking drums is constructed of a plastic lined wooden framed receptacle lined with absorbant material. A more elaborate containment basin or alternate system seems more appropriate.

Michael Williams Oakland Army Base Alaska Street, Building #1 Oakland, CA 94626 Page 2 of 2

Berms surrounding several hazardous waste holding areas within the compound have recently been installed. These berms have been constructed on top of existing asphalt. Some method of testing to determine whether the berms are sealed and are capable of containing liquid within their intended boundary should be performed.

Per CCR Title 22, Section 66328, you are required to send a plan of correction within 30 days to this office addressing these noted items.

If you have any questions please direct them to Paul Smith with our department at 271-4320.

Sincerely,

Edgar B. Howell III, Chief, Hazardous Materials Division

gar Stowell

EBH: PMS: pms

Enclosures (2)

CC: Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection Agency

RWQCB

Charlene Williams, DHS

DEPARTI Hazardot 80 Swan Oakland, (415) Oakland Army Base

R0876 @

O Alaska St.

June 30, 1989

Jaime Medina
U.S. Army Corps. of Engineers
Sacramento District
SPK-ED-T-DQA
650 Capitol Mall
Sacramento, CA 95814

Dear Mr. Medina:

Please find enclosed, a copy of our closure/modification plan form for Underground Tanks. This form when completed, must be approved by our office prior to action taken to remove any underground tanks in our County.

As we discussed, we will await a call from your consultant with a work plan for the tank removals at Oakland Army Base.

If you have any questions, please contact either Edgar Howell, Supervising Hazardous Materials Specialist or Ariu Levi, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,

Rafat A. Shahid, Chief

PLOAS

Hazardous Materials Program

RAS: EH: mnc

cc: Ariu Levi, Alameda County Hazardous Materials

Edgar Howell, Alameda County Hazardous Materials

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