

From: Seery, Scott, Env. Health
Sent: Friday, July 16, 2004 10:30 AM
To: Sue Patton (E-mail)
Cc: Drogos, Donna, Env. Health; 'Brad Wright'
Subject: RE: AC Transit 1758 Sabre St. Hayward

We understand your concern about meeting the July 15 due date for submittal of a 2nd quarter 2004 report. We also understand that AC Transit did not reasonably anticipate the need to sample and monitor the current well network during the 2nd quarter 2004.

In accordance with the June 30, 2004 directive letter, please sample and monitor the current (and future) well network, and report the results of this work, following the quarterly schedule outlined in the cited directive letter. Please initiate this series of tasks during the 3rd quarter 2004.

Scott Seery

-----Original Message-----

From: Brad Wright [mailto:bwright@cameron-cole.com]
Sent: Thursday, July 15, 2004 1:26 PM
To: Scott Seery (E-mail)
Cc: Sue Patton (E-mail)
Subject: AC Transit 1758 Sabre St. Hayward

At the request of Ms. Suzanne Patton of AC Transit, I am responding to your request for submittal of a quarterly groundwater report for the AC Transit facility located at 1758 Sabre Street in Hayward, California. There are currently no groundwater monitoring activities conducted at the facility. The two recently installed monitor wells were specifically designed to assess groundwater levels in the vicinity of the facility's storm water conveyance system. As part of an investigation to determine the source of hydrocarbons detected within the facility storm water conveyance system, it was necessary to understand if depths to first encountered groundwater were less than the deepest sections of the storm water conveyance system. The two monitor wells, MW-1 and MW-2, were located immediately adjacent to two of the largest and deepest catch basins. The wells were developed and allowed to equilibrate prior to measuring depth to groundwater. It was determined that groundwater levels were below those of the bottom of the catch basins.

I understand that a soil and groundwater investigation designed to assess potential impacts to the subsurface from facility fueling operations will occur later this year. If it is determined that concentrations of hydrocarbons are detected in groundwater samples collected during the investigation, additional monitor well will be installed to assess the nature and extent of the impact. Impacted groundwater is more often seen in the vicinity of the underground storage tanks and dispenser lines and in the direction of groundwater flow. As the existing wells are located 380 feet and 430 feet from the underground storage tanks and cross gradient to groundwater flow, they are not appropriately located to assess the facility's fueling operations.

Should the soil and groundwater investigation determine that groundwater impacts do exist and additional monitor wells are installed, data from MW-1 and MW-2 can be used in the development of the site specific potentiometric surface map.

Should you have any questions or if you would like to discuss this issue, please feel free to call me at 510-769-3563.

Brad Wright RG, ChG
VP-Regional Manager
Alameda, California
(510) 769-3563

Drogos, Donna, Env. Health

From: Seery, Scott, Env. Health
Sent: Thursday, July 15, 2004 3:16 PM
To: Drogos, Donna, Env. Health
Cc: Levi, Ariu, Env. Health; Hugo, Susan, Env. Health
Subject: FW: AC Transit 1758 Sabre St. Hayward

I received the attached e-mail this afternoon and have not responded to it.

I offer two comments I have after my brief review of it, however:

1) I do not recall that the Cameron-Cole report actually determined ground water flow directions; however, if they did, I am not certain how that was accomplished. There are only two wells at the site. That said, storm water flow through the underground conveyance system runs roughly NE to WSW across the site, as I recall. The UST complex is located ~50' north of the NE head basin of the storm water conveyance system. The storm water system ultimately discharges to nearby Sulfur Creek, as I have been informed. I think it reasonable to conclude, absent contrary data, that groundwater flow may mimic the storm water conveyance system flow direction. I so, the noted wells appear to be in locations that are down gradient of the UST complex.

2) The wells were in fact sampled. Therefore I conclude now, as before, that the wells were not installed for the sole purpose of determining whether or not first encountered GW was below the SW system, as is articulated in the attached e-mail. A push tool sample point could have made that determination more simply and cheaply than a constructed well.

I believe the motivation for this e-mail and the prior one, as well as the phone calls I received from Suzanne Patton following her receipt of the 6/30/04 directive letter, is that AC Transit is seriously concerned about being perceived as being out of compliance to the quarterly report component of that directive. I can understand AC Transit's on that front. When I wrote the 6/30/04 letter I saw that the wells had been last sampled in March 2004 (1st qtr), and I was simply looking to establish and maintain a schedule of sampling/monitoring/reporting continuity by requesting the 2nd quarter report, due July 15th. It turns out that they had not sampled the wells since March and were not prepared to do so in time to comply with the requested report date.

I believe that it would be reasonable to waive the July 15th report component based on these facts.

-----Original Message-----

From: Brad Wright [mailto:bwright@cameron-cole.com]
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To: Scott Seery (E-mail)
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Subject: AC Transit 1758 Sabre St. Hayward

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Brad Wright RG, ChG
VP-Regional Manager
Alameda, California
(510) 769-3563

Drogos, Donna, Env. Health

From: Seery, Scott, Env. Health
Sent: Thursday, July 08, 2004 2:09 PM
To: Drogos, Donna, Env. Health
Cc: Sandbach, Alyce, DA
Subject: FW: AC Transit, 1758 Sabre St., Hayward

FYI. I received this e-mail today and have not responded to it.

The two wells in question should be monitored and sampled in my view. They are both penetrating and screened across shallow water-bearing aquifer materials fairly consistent with UST invert depths (Note: UST pits had standing water in them). They are also both located in a location from the UST complex that one could presume to be down gradient based on storm water flow. One well also showed low ppb diesel range impacts, the source(s) of which is(are) still unknown.

-----Original Message-----

From: Sue Patton [mailto:SPatton@actransit.org]
Sent: Thursday, July 08, 2004 7:37 AM
To: 'Seery, Scott, Env. Health'
Cc: Brad Wright (E-mail)
Subject: RE: AC Transit, 1758 Sabre St., Hayward

I read your attachment letter this morning. You requested a quarterly ground water report by July 15, 2004. This cannot happen. These wells have not been sampled on a quarterly basis and therefore there will be no quarterly report. These wells were installed only as a preliminary step in investigating the situation with the leak into the storm drain and were not installed to address the UST site. The installation and sampling of these wells were not intended to be used for any comprehensive ground water well network.

Please issue a revised letter to reflect that quarterly ground water monitoring will be required upon execution of an investigation workplan that will include the installation of a proper network of ground water wells for evaluation of the release associated with the UST area. I would suggest that the quarterly monitoring start with the first round of samples taken after additional wells are installed, upon approval of the workplan for the work.

Please call me at 577-8869 if you have any questions.

-----Original Message-----

From: Seery, Scott, Env. Health [mailto:scott.seery@acgov.org]
Sent: Thursday, July 01, 2004 10:20 AM
To: 'Sue Patton'
Subject: RE: AC Transit, 1758 Sabre St., Hayward

Suzanne

I did manage to put out a directive yesterday before leaving the office. I've attached a copy. here. Original is in the mail.