

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO# 30

2130 ADELINE ST

✓ RO# 449

October 10, 1996

Richard Sykes  
EBMUD  
P.O. Box 24055  
Oakland, CA 94623-1055

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

Re: Addendum No. 2 to the Materials Management Plan for the Adeline Maintenance Center,  
Oakland, California

Dear Mr. Sykes,

This office has reviewed a portion of Geoplexus, Inc.'s Addendum No. 2 to the Materials Management Plan for the Adeline Maintenance Center, dated September 12, 1996. Per my conversation with Eileen Fanelli today, the following is a list of comments on the workplan, excluding the risk assessment portion presented in Appendix 2A. Madhulla Logan in our office will begin review of the risk assessment within the next week.

- o On Page 2 of the Addendum, it states that "Based on the established threshold criteria, the remaining soil contamination beneath West Grand Avenue does not require excavation." However, according to our files, the benzene concentration in Sample MK143, located along Grand Avenue, identified 16 parts per million (ppm) benzene at 7-feet below ground surface (bgs). Therefore, this office is requesting that the Addendum address these concentrations through a risk assessment or some sort of investigation or corrective action proposal.
- o Per Figure 6 of the Addendum, two borings were proposed roughly in the area of former Boring 2-7 beneath the proposed building footprints. However, at least one additional boring should be placed in closer proximity to Boring 2-7 to better delineate the elevated contaminant levels previously identified in this boring. Contaminants identified in Boring 2-7 included elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg), benzene, toluene, ethylbenzene, xylenes (BTEX), TPH as diesel (TPHd), Oil & Grease, and halogenated volatile compounds. If the waste oil underground storage tank (UST) is located in the immediate vicinity, sampling associated with the removal of this UST may also assist in delineating the observed contamination.

The location of the waste oil UST is unclear. Please submit a figure with the exact location of this UST.

Mr. Richard Sykes  
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- o Please be reminded that the removal of the waste oil UST should include permitting through this office and the City of Oakland Fire Department. Analysis of soil samples collected from this UST removal should include TPHg, TPHd, BTEX, Oil & Grease, halogenated volatiles (VOCs), polynuclear aromatic hydrocarbons (PNAs), and metals.
- o Page 5 of the Addendum mentions that the threshold criterias used for metals would be the TTLCs listed in Title 22 California Code of Regulations. However, it is unclear when soil samples collected from the Phase II and Phase III areas would be analyzed for metals. Additionally, if EBMUD is planning to use TTLCs as the threshold criteria, it should also be using some sort of leachability criteria as well. Typically, this office requests that a "WET" test be conducted when metal concentrations are identified at 10 times the STLC in soil. However, if in-situ metal concentrations are identified at the site at 10 times the STLC, this office will allow the application of Method 1312, which simulates acid rain with the use of sulfuric and nitric acid. This method is much more realistic and applicable for this site situation. However, it is the understanding of this office that off-hauled excavated soils from the site will be analyzed for STLC per the landfill disposal requirements.
- o Page 9 of the Addendum does not list the PNAs and VOCs analyses. Per my conversation with David Glick, Geoplexus, on October 9, 1996, these analyses only refers to the area with the former 4,000-gallon and 6,000-gallon underground storage tanks (Phase II) and not to the waste oil UST area.
- o The threshold criteria listed for ethylbenzene in Table 1, Page 4, does not match our copy of the Tier 1 Look-up Table values listed in the American Society for Testing and Materials' Risk-Based Corrective Action guidelines (ASTM RBCA, Version E-1739-95). Please clarify.
- o Groundwater investigations associated with the observed soil contamination was not mentioned in the schedule provided in the Addendum. This office is requesting that groundwater investigations begin immediately after the completion of the Phase II and Phase III work. A Tier II ASTM RBCA analysis may also be needed.

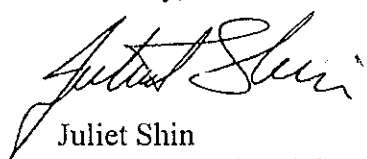
RO# 30

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Mr. Richard Sykes  
Re: AMC  
October 10, 1996  
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Please submit a response to the above concerns for our review. If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,



Juliet Shin  
Senior Hazardous Materials Specialist

cc: Eileen Fanelli  
EBMUD  
P.O. Box 24055  
Oakland, CA 94623-1055

David Glick  
GeoPlexus, Inc.  
1900 Wyatt Drive, Ste 1  
Santa Clara, CA 95054

Acting Chief

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Ro# 30

RAFAT A. SHAHID, DIRECTOR

June 24, 1996

Cynthia Adkisson  
East Bay Municipal Utility District  
P.O. Box 24055  
Oakland CA 94623-1055

DEPARTMENT OF ENVIRONMENTAL HEALTH  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6777

**RE: Underground Storage Tank Operating Permit for  
EBMUD Oakland Corporation Yard, 1200 21st St., Oakland  
(Our Site # 3917)**

Dear Ms. Adkisson:

Enclosed is the permit to operate one underground storage tank at the corporation yard. The permit is valid until April 14, 1997.

This waste oil tank is 2,500 gallon, double-walled fiberglass with double-walled fiberglass gravity piping. The monitoring system to be used is as follows: The annular space of the tank and pipes is monitored by two liquid sensors. The tank annulus sensor is located within the low point of the tank interstitial space and the pipe sensor is located in the fill sump. Leak monitoring equipment for the system will be inspected for proper function at least yearly.

Continued compliance with applicable requirements of Chapter 6.7 and 6.75 of the Health and Safety Code and Title 23, California Code of Regulations is required in order for this permit to remain valid. **Your written tank monitoring plan needs to be updated by July 24, 1996 to include information on the newly installed monitoring system.** I have enclosed a copy of other permit conditions.

If you make any changes in the monitoring methods, equipment types, and/or procedures used to monitor the tanks and piping at this facility, you must:

- 1) ensure the new procedures comply with Title 23, CCR; and
- 2) send written notification of the changes to this office.

You may contact me with any questions regarding the UST permit or this letter at (510) 567-6770.

Sincerely,

Pamela J. Evans  
Senior Hazardous Materials Specialist

Enclosure

c: Gordon Coleman, ACDEH  
Don Atkinson-Adams, ACDEH

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Alameda County  
Environmental Health Services  
1131 Harbor Bay Pkwy., #250  
Alameda CA 94502-6577  
(510)567-6700 FAX(510)337-9335

Ro# 30

CC4580

STID# 3917

June 7, 1996

Mr. Richard Sykes  
East Bay Municipal Utility District (EBMUD)  
P.O. Box 24055  
Oakland, CA 94623-1055

Re: Closure of Block 4 of the Adeline Maintenance Center (AMC), located at 1200 21st St.,  
Oakland, California

Dear Mr. Sykes,

It appears that two underground storage tanks (one 10,000-gallon diesel and one 500-gallon gasoline) were removed from the above site in 1986. Analyses of soil samples collected from surface soils, borings, and test pits placed at the site between February 1995 and January 1996 identified up to 960 parts per million (ppm) Total Petroleum Hydrocarbons as gasoline (TPHg), 11 ppm benzene, 11 ppm toluene, 9.9 ppm ethylbenzene, 78 ppm xylenes, 330 ppm Total Petroleum Hydrocarbons as diesel (TPHd), 450 ppm Oil & Grease (O&G), 3.9 ppm phenanthrene, 2.9 ppm fluoranthene, 3.3 ppm pyrene, and, except for the lead concentrations, metal concentrations were fairly low.

Based on GeoPlexus, Inc.'s Closure Report, dated May 29, 1996, for the site, approximately 3,265 tons of soil was excavated from the site in February 1996 in order to remediate contaminant concentrations to below cleanup levels. The cleanup levels for the site are based on Tri-Valley Regional Guidelines, the American Society for Testing and Materials' Risk-Based Corrective Action Guidelines, and Total Threshold Limit Concentrations (TTLCs). Dermal, ingestion, and inhalation exposures were not considered based on EBMUD's statement that the site will remain paved.

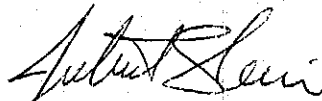
Although confirmatory soil samples collected from the excavation indicate that contaminant concentrations have been remediated to below cleanup levels, the lead concentrations identified in the area of former Boring 6-1 (2,600 ppm at 3-foot bgs and 440 ppm and 970 ppm in surface soils) have not been removed. Although one of these sample concentrations exceeds the 1,000 ppm TTLC given for lead, this contamination appears to be limited in extent, and this office feels that this lead contamination, along with the surficial lead concentrations, will not pose a problem as long as the site remains paved. However, if the paving is ever removed, EBMUD will be required to notify the local implementing agency and assess the potential exposure routes and impacts to human health and the environment for these concentrations

Based on the above information, it appears that corrective action for the observed hydrocarbon and metal contamination at Block 4 of the AMC Facility has been completed.

Mr. Richard Sykes  
Re: Block 4-1200 21st St.  
June 7, 1996  
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If you have any questions or comments, please feel free to contact me at (510) 567-6763.

Sincerely,



Juliet Shin  
Senior Hazardous Materials Specialist

cc: Eileen M. Fanelli  
EBMUD  
P.O. Box 24055  
Oakland, CA 94623-1055

David Glick  
GeoPlexus, Inc.  
1900 Wyatt Drive, Ste 1  
Santa Clara, CA 95054

Acting Chief-file

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R030

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

February 17, 1995  
STID 3917

Attn: Karl Mayo  
Mailstop 303  
EBMUD  
PO Box 24055  
Oakland CA 94623-1055

DEPARTMENT OF ENVIRONMENTAL HEALTH  
ALAMEDA COUNTY CC4580  
DEPT. OF ENVIRONMENTAL HEALTH  
ENVIRONMENTAL PROTECTION DIVISION  
1131 HARBOR BAY PKWY., #250  
ALAMEDA CA 94502-6577

RE: Adeline Maintenance Center, 1200-21st St., Oakland CA 94607

Dear Mr. Mayo,

I am in receipt of a transmittal document from your office, unsigned, dated 2/2/95. Attached to this transmittal are the hazardous waste manifests for the six USTs, as well as a certificate for receipt of 1,391.21 tons of "HC material," presumably hydrocarbon contaminated soils, on 11/22/94, from REMCO in Richmond.

I am also in receipt of the 12/29/94 "Interim Remedial Action Summary Report," by GEMS. This report includes a fairly good description of tank removal activities, so I'll consider this a Tank Removal Report, required as per the Underground Tank Closure Plan. The highest residual soil concentrations (upper 8') are 2,800 ppm TPHg, 16 ppm benzene, 440 ppm TPHd, and 900 ppm O&G. Water in the 6,000-gal UST excavation was sampled and found to contain 6,200 ppb TPHg, 2,400 ppb TPHd, and 340 ppb benzene. This water was presumed to be perched water by GEMS. A hydrocarbon sheen was noted on the walls of the excavation. There was a pronounced hydrocarbon odor throughout the tank removal process. Apparent free product on the groundwater was noted, and vacuumed out. GEMS does not attribute the contamination in the upper strata to the USTs.

**The GEMS report recommends that the County postpone requirements for borings and/or monitoring wells until the ensuing demolition activities are completed and observed/logged/sampled by a Registered Civil/Geotechnical Engineer and/or CEG. In order to accept this scenario, further information is need. Please submit a time schedule of anticipated activities, within 30 days, or by March 17, 1995.** This office should be informed as the demolition and construction proceeds, as well as if contamination is discovered during these activities. A more specific request will be made upon receipt of the anticipated time schedule.

A Health and Safety Plan should be prepared for the ensuing demolition and construction activities. This plan must include an evaluation of the risk of exposure for workers to the hydrocarbons already identified at this site.

STID 3917  
Attn: Karl Mayo  
2/17/95  
page 2 of 2

I understand that borings were installed in January in this four square block area for geotechnical purposes, as per a telephone conversation with David Glick on 2/16/95. I also understand that samples were collected and analyzed. **Please submit a copy of this geotechnical report to this office.**

On 12/13/94, I mailed you six "B Forms" from the State's Underground Storage Tank Permit Application. I have not yet received the completed B forms. As you may recall, one B form is needed for each UST removed. I already have B forms for the 4,000-gal and 6,000-gal fiberglass USTs, removed on 11/17/94. **Please submit the B forms for the remaining four USTs within 15 days, or by March 4, 1995.**

**In addition, please also submit an Unauthorized Leak Report (ULR) for this site within 15 days, or by March 4, 1995.** A blank form is enclosed.

Please note that with the exception of closure reports, routine reports and documents no longer need to be copied to the Regional Water Quality Control Board. If you have any questions, please contact me at 510-567-6700, ext 6761; our fax number is 510-337-9335. **Please submit reports on double-sided paper in order to save trees.**

Sincerely,



Jennifer Eberle  
Hazardous Materials Specialist

cc: David Glick, GeoPlexus, 1900 Wyatt Dr., Suite 1, Santa Clara CA 95054  
Richard Camacho, GEMS, PO Box 8282, Pittsburg CA 94565  
Juliet Shin, Alameda County  
EBMUD, PO Box 24055, Oakland CA 94623-1055, ATTN: Bruce Lepoure, Health and Safety, (6th Floor)  
Ed Howell/file

je.3917  
enclosure