

24 October 1997

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*By Ioprojectop at 2:03 pm, Jun 09, 2006*

Ms. Susan Hugo  
Senior Hazardous Materials Specialist  
Alameda County Department of Environmental Health  
1131 Harbor Bay Parkway  
Alameda, California 94502

Subject: Addendum to Closure Report -- Site Management Plan  
Three Former Underground Storage Tanks at  
6601 and 6603 Bay Street, Emeryville, California  
(EKI 950074.03)

Dear Ms. Hugo:

On behalf of Sybase, Inc., Erler & Kalinowski, Inc. ("EKI") has prepared this addendum to the EKI report entitled *Closure Report, Three Former Underground Storage Tanks at 6601 and 6603 Bay Street, Emeryville, California* dated 18 August 1997 ("*Closure Report*"). This addendum includes a Site Management Plan ("SMP") which has been prepared at the request of the Alameda County Department of Environmental Health ("ACDEH") at our meeting on 2 October 1997.

The SMP relates to the site of three former underground storage tanks ("USTs") on the properties located at 6601 and 6603 Bay Street ("the Site") in Emeryville, California (Figure 1). The SMP discusses health and safety measures which should be taken by Sybase, Inc. and future Site owners and tenants relating to the former UST site, including:

- health and safety training for workers contacting soil at the site of the former USTs,
- notification of ACDEH if a change in land use is intended, and
- the requirement that the Site property owner obtain ACDEH approval prior to use of groundwater at the Site.

## BACKGROUND

The Site is located on Bay Street between 66th Street and 67th Street in Emeryville, California. The northern portion of the Site is occupied by two concrete tiltup warehouse buildings that are currently used by Sybase, Inc. as office space (Figure 2).

In 1989, three USTs were removed from the paved area south of the buildings on the Site (Figure 2). The three former USTs were reportedly used to store diesel and gasoline. During excavation of the tanks, black petroleum product reportedly flowed from the south wall into the excavation. An estimated 2,000 gallons of petroleum product accumulated in the excavation and was removed by a hazardous waste hauler (William Dubovsky Environmental, *Environmental Report, 6601 and 6603 Bay Street, Emeryville, California*, July 1990). The tank excavation area is shown on Figure 2.

Soil and groundwater investigations at the Site were conducted by EKI in 1996 and 1997. As discussed in detail in EKI's investigation report entitled *Results of Soil and Groundwater Investigations at 6601 and 6603 Bay Street, Emeryville, California*, dated 23 August 1996 and *Closure Report*, dated 18 August 1997, the available data indicate there are no significant sources of petroleum hydrocarbons in soil and groundwater relating to the former USTs. Maximum detected chemical concentrations remaining in soil and groundwater in the vicinity of the former USTs are summarized in the *Closure Report* (i.e., Tables 3 and 4).

The *Closure Report* also included an evaluation of potential human health risks to occupants of the Site from chemicals in soil and groundwater at the former UST site. The only potentially complete exposure pathways of on-Site workers to the detected chemicals of concern in soil are through (1) inhalation of chemicals volatilized from soil to outdoor air and (2) occasional exposure by maintenance workers to chemicals in soil during work on subsurface utilities (e.g., through dermal contact, incidental ingestion, or inhalation). One such subsurface utility is a storm drain line that runs along the northern edge of the former UST excavation area (Figure 2).

Dermal contact with groundwater and ingestion of groundwater were not considered to be complete exposure pathways because Site groundwater is not currently used for drinking or other purposes, and is not expected to be used in the future. Inhalation of volatiles from groundwater were, however, considered complete exposure pathways.

In the risk evaluation, none of the detected chemical concentrations in soil and groundwater at the former UST site were found to exceed potentially applicable human health risk-based screening levels. This indicates that risk levels corresponding to the potentially complete exposure pathways are significantly below acceptable risk levels,

i.e., a  $10^{-5}$  (i.e., one in one hundred thousand) incremental cancer risk for carcinogens and a hazard quotient of one for non-carcinogens.

## SITE MANAGEMENT MEASURES

In the *Closure Report*, potential human health risks due to chemicals of concern at the former UST site were evaluated to be less than significant given the current land use at the Site. Changes in land use may result in higher, potentially significant human health risks. As a precautionary measure, ACDEH has indicated that the following health and safety measures are hereafter required in the vicinity of the former UST site:

Health and safety training for workers contacting soil in the vicinity of the former USTs: Although the human health risk evaluation indicated no significant risk associated with residual chemicals of concern in soil, the ACDEH requested that workers who may come into contact with residual chemicals of concern in soil while working in soil in the vicinity of the former UST site (e.g., during a utility repair) be appropriately health and safety trained. For this reason, contractors whose workers may dig into soil in the vicinity of the former UST site (i.e., within approximately 20 feet of the excavation limits shown on Figure 2) must prepare a site-specific health and safety plan that is consistent with State and Federal Occupational Safety and Health Administration ("OSHA") standards for hazardous waste operations (Code of California Regulations, Title 8, Section 5192 and 29 Code of Federal Regulations 1910.120) and any other applicable health and safety standards. Contractors will provide copies of their health and safety plans to the Site owner. Among other things, the contractors health and safety plan will include a description of health and safety training requirements for Site workers, a description of the level of personal protective equipment ("PPE") to be used, and any other applicable precautions to be undertaken to minimize direct contact with soil.

ACDEH notification required if a change in land use is intended: The *Closure Report* presented an evaluation of human health risks based on the existing commercial/industrial use of the Site. The Site property owner must notify ACDEH if a change in land use is intended. For example, ACDEH must be notified prior to use of the Site for residential purposes.

ACDEH approval required prior to use of groundwater at the Site: The health risk evaluation in the *Closure Report* assumed that Site groundwater will not be used (i.e., for drinking water supply or other purposes, such as irrigation). As of June 1997, benzene concentrations detected in groundwater in the vicinity and downgradient of the former UST site exceeded California Maximum Contaminant Levels for drinking water. Therefore, if the Site property owner wants to use groundwater at the Site, they must obtain approval from the ACDEH. Such approval is expected to be granted only after an

evaluation of groundwater conditions indicates that no significant human health risk will result from such use.

Having prepared this Site Management Plan, Sybase, Inc. requests that ACDEH provide a no further action letter signifying the closure of the three former USTs as discussed our meeting on 2 October 1997.

Please call me or Brad McInroy at Sybase, Inc. (510-922-4570) with any questions.

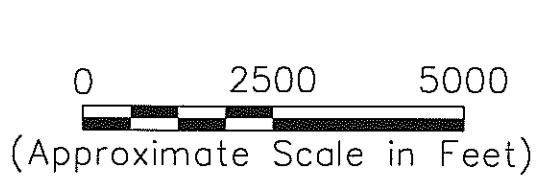
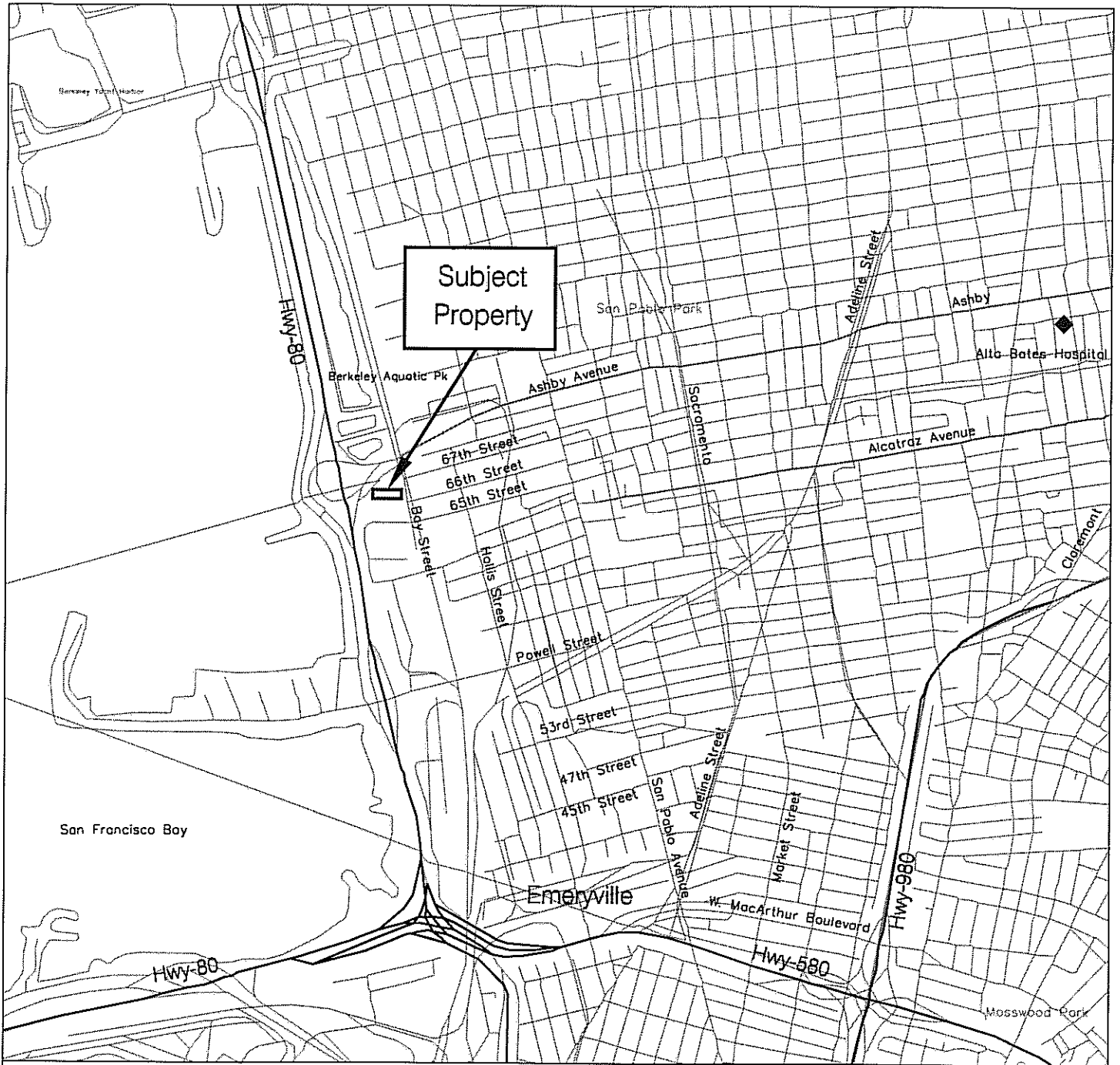
Very truly yours,

ERLER & KALINOWSKI, INC.

A handwritten signature in black ink, appearing to read 'Michelle King' with a stylized flourish at the end.

Michelle Kriegman King, Ph.D.  
Project Manager

cc: Brad McInroy, Sybase, Inc.  
Hope Spadora, Sybase, Inc.



# Erler & Kalinowski, Inc.

Site Location

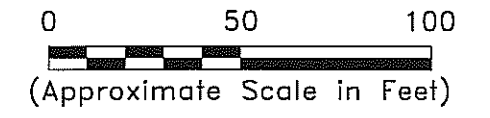
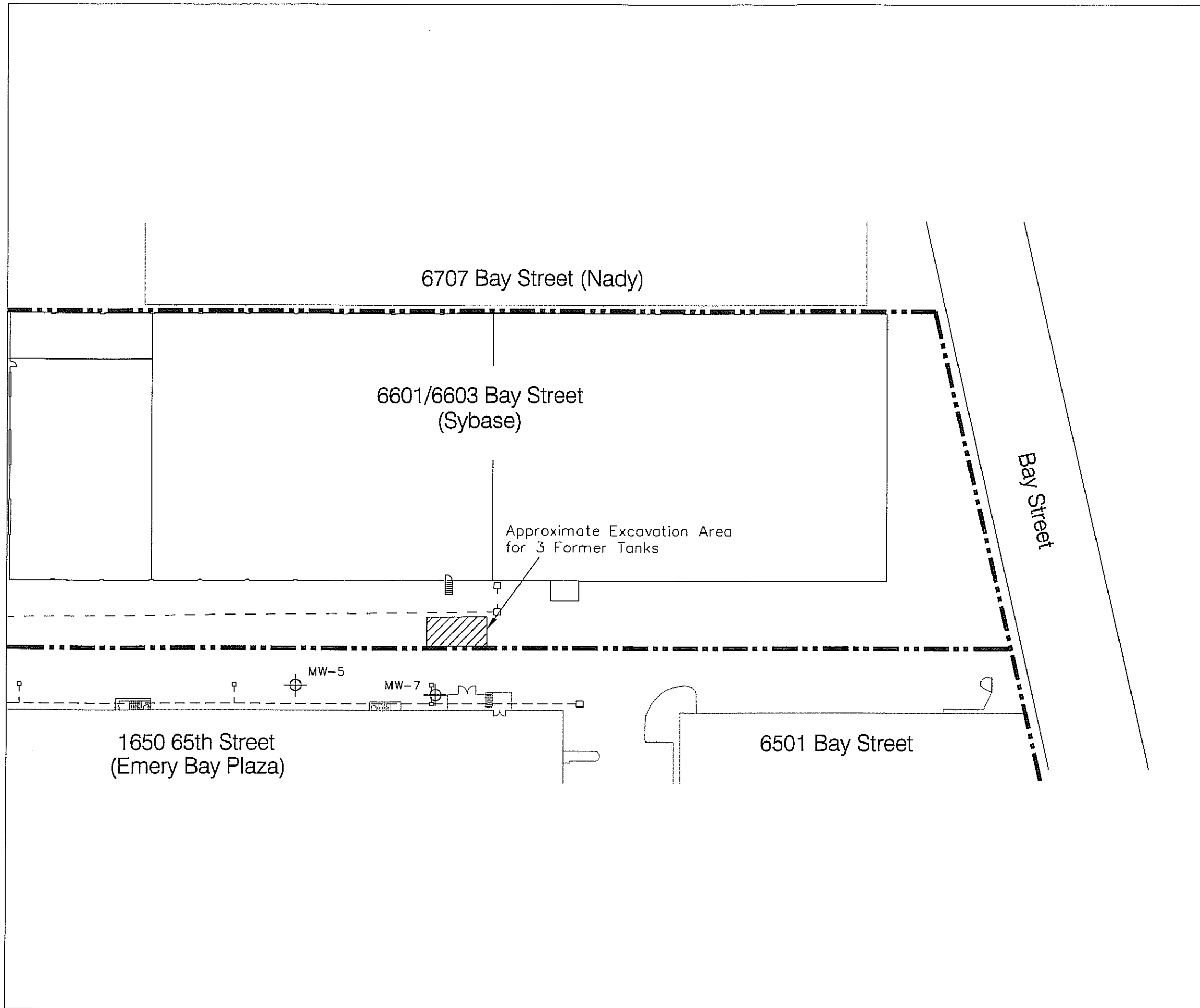
6601/6603 Bay Street  
Emeryville, CA

October 1997  
EKI 950074.03

Figure 1

**Notes:**

1. All locations are approximate.



**LEGEND**

- · — · — Property Boundary
- - - - - Sanitary Sewer Line
- - - - - Storm Drain Line
- ⊕ Off-Site Monitoring Well Location
- ▨ Approximate Tank Excavation Area

**Notes:**

1. All locations are approximate.
2. Base map digitized from Alta Land Survey Title Map.

**Erler & Kalinowski, Inc.**

Location of Former Tank Excavation Area

6601/6603 Bay Street  
Emeryville, CA  
October 1997  
EKI 950074.03  
Figure 2