

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R054

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

May 26, 1994  
STID# 799

Mr. Don Mammini  
Ryerson Steel and Aluminum  
1465 65th Street  
Emeryville, CA 94608

**Subject: Investigation / Remediation Related to the Former  
Underground Storage Tank at Ryerson Steel and Aluminum  
1465 65th Street, Emeryville, CA 94608**

Dear Mr. Mammini:

This office has completed review of the Phase I Subsurface Investigation Report (September 14, 1993) and the Quarterly Monitoring Report (December 21, 1993) prepared by Hydro Environmental Technologies for the referenced site.

Based on this review, the following issues must be addressed regarding the on going investigation at this site:

- 1) Free floating product has been detected in monitoring well MW-3 which is upgradient of the former tank excavation. The source of this floating free-phase hydrocarbon must be identified.
- 2) All monitoring wells should be continuously sampled every quarter and analyzed for the following target compounds: TPH gasoline, TPH diesel, benzene, toluene, ethyl benzene and xylene. Groundwater elevation readings must be incorporated in the quarterly monitoring program.
- 3) The vertical and lateral extent of soil and groundwater contamination must be delineated. The isoconcentration line of the contaminant plume must be determined.
- 4) The free floating product detected in MW-3 should be characterized. The free product should be analyzed for TPH gasoline, TPH diesel, benzene, toluene, ethyl benzene, xylene and total oil and grease.

Please submit a work plan which addresses all the issues listed above. Your work plan should be submitted to this office **no later than June 30, 1994.**

Mr. Don Mammini  
RE: 1465 65th Street, Emeryville, CA 94608  
May 26, 1994  
Page 2 of 2

Until cleanup is complete, you will need to submit reports to this office every three months or at a more frequent interval, if specified at any time. In addition, the following items must be incorporated in your future reports or workplans:

- a cover letter from the responsible party or tank owner stating the accuracy of the report and whether he/she concurs with the conclusions and recommendations in the report or workplan
- site map delineating contamination contours for soil and groundwater based on recent data should be included and the status of the investigation and cleanup must be identified
- proposed continuing or next phase of investigation / cleanup activities must be included to inform this department of the responsible party or tank owner's intention
- any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained
- historical records of groundwater level in each well must be tabulated to indicate the fluctuation in water levels
- tabulate analytical results from all previous sampling events; provide laboratory reports (including quality control/quality assurance) and chain of custody documentation

Please contact me at (510) 271-4530 if you have any questions concerning this letter.

Sincerely,

*Susan L. Hugo*

Susan L. Hugo  
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health  
Kevin Graves, San Francisco Bay RWQCB  
Edgar B. Howell, Chief, Hazardous Materials Division - files  
Markus Niebanck, Hydro Environmental Technologies,  
2363 Mariner Square Dr., Suite 243, Alameda, CA 94501

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R054

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

September 7, 1993  
STID# 799

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

Mr. Don Mammini  
Ryerson Steel and Aluminum  
P.O. Box 23070  
Oakland, California 94623

**RE: Investigation / Remediation Related to the Former  
Underground Storage Tank at Ryerson Steel and Aluminum  
1465 65th Street, Emeryville, California 94608**

Dear Mr. Mammini:

The Alameda County Department of Environmental Health, Hazardous Materials Division has recently reviewed the Work Plan for Additional Assessment (July 2, 1993) prepared and submitted by Hydro Environmental Technologies for the referenced site.

Based on this review, this department concurs with the basic elements of the workplan. The work plan is acceptable and can be implemented with the following conditions:

- \* Construction and placement of the wells must adhere to the requirements specified in "Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites", August, 1990. Monitoring wells must be screened to intercept free floating product and accommodate seasonal water table fluctuations.
- \* Soil samples must be collected every five feet as per RWQCB's guidelines. Field instruments are acceptable as a screening tools only. Any evidence of soil contamination such as odor, visual staining or field instrument readings must be verified by analysis from a state certified laboratory.
- \* Groundwater monitoring wells must be sampled on a quarterly basis and analyzed for the following target compounds: TPH diesel, benzene, toluene, ethyl benzene and xylene. As proposed by Hydro Environmental Technologies, groundwater elevation readings must be taken monthly for two months following the initial sampling event. Upon completion of the first quarter monitoring event, the need for continuous monthly groundwater elevation measurements will be determined. Groundwater elevation readings must be incorporated in the quarterly monitoring program. After four quarters of non detectable levels have been achieved, the frequency of sampling events will be evaluated and/or a recommendation for signoff/case closure by RWQCB will be determined.

Mr. Don Mammini  
RE: 1465 65th Street, Emeryville, CA 94608  
September 7, 1993  
Page 2 of 3

- \* Groundwater flow gradient should be calculated based on a three (3) point measurements of the water level in the wells. Groundwater flow direction must be established at the site. One monitoring well must be within ten feet of the former tank location in the verified downgradient direction.
- \* Please submit a time schedule for all phases of the investigation and remediation activities and the anticipated time when cleanup will be completed at the site.
- \* Please notify this office at least 48 hours in advance for the start up of work plan implementation so a site visit can be arranged by a representative from this office.

A report must be submitted within **45 days** after completion of this investigation. Until cleanup is complete, you will need to submit reports to this office every three months (or at a more frequent interval, if specified at any time by this agency). In addition, the following items must be incorporated in your future reports or workplans:

- a cover letter from the responsible party or tank owner stating the accuracy of the report and whether he/she concurs with the conclusions and recommendations in the report or workplan
- site map delineating contamination contours for soil and groundwater based on recent data should be included and the status of the investigation and cleanup must be identified
- proposed continuing or next phase of investigation / cleanup activities must be included to inform this department or the RWQCB of the responsible party or tank owner's intention
- any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained
- historical records of groundwater level in each well must be tabulated to indicate the fluctuation in water levels
- tabulate analytical results from all previous sampling events; provide laboratory reports (including quality control/quality assurance) and chain of custody documentation

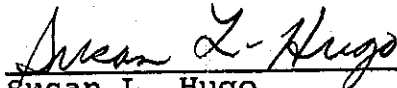
Mr. Don Mammini  
RE: 1465 65th Street, Emeryville, CA 94608  
September 7, 1993  
Page 3 of 3

All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project.

Because we are overseeing this site under the designated authority of the Regional Water Quality Control Board, this letter constitutes a formal requests for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency.

Please contact me at (510) 271-4530 if you have any questions concerning this letter.

Sincerely,



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Susan L. Hugo  
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health  
Rich Hiett, San Francisco Bay RWQCB  
Gil Jensen, Alameda County District Attorney's Office  
Edgar B. Howell, Chief, Hazardous Materials Division - files  
Markus Niebanck, Hydro-Environmental Technologies, Inc.  
2363 Mariner Square Drive, Suite 243  
Alameda, California 94501

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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

May 4, 1993  
STID# 799

Mr. Don Mammini  
Ryerson Steel & Aluminum  
1465 65th Street  
Emeryville, California 94608

**RE: Removal of a Diesel Underground Storage Tank at Ryerson  
Steel & Aluminum - 1465 65th Street, Emeryville CA 94608**

Dear Mr. Mammini:

The Alameda County Department of Environmental Health, Hazardous Materials Division has reviewed the files concerning the removal of one diesel underground storage tank on March 11, 1993 at the referenced site. We are in receipt of the analytical results of the soil and groundwater samples collected during the tank removal activity as submitted by Semco.

Soil samples collected beneath the tank areas (approximately 8'6" to 9'6" bgs) showed non detectable levels of Total Petroleum Hydrocarbon as diesel, benzene, toluene, ethyl benzene and xylene. Groundwater sample collected from the excavation exhibited 850 ppb of TPH diesel and non detect for benzene, toluene, ethyl benzene and xylene. Stockpiled soil showed 26 ppm TPH diesel, 7 ppb toluene and non detect for benzene, ethyl benzene, and xylene. In addition, free floating product was observed in the groundwater and strong soil staining was visible from the excavation walls at 4 to 5 feet bgs. Because of the degree of contamination found at the site which exceeded regulatory threshold levels, an "Underground Storage Tank Unauthorized Release (Leak)/Contamination Site Report" must be submitted. Enclosed is a blank copy which must be completed and submitted to this office within 5 working days. In addition, further environmental assessment is required to determine the extent of the unauthorized release associated with the former tank at the site.

This office will be the lead agency overseeing the environmental investigation and cleanup activities at the site. The RWQCB has delegated this authority to our office. However, you must keep the Water Board apprised of all actions taken to characterize and remediate contamination at the site, because the Board retains the ultimate responsibility for ensuring protection of the waters of the state.

Mr. Don Mammini  
RE: 1465 65th Street, Emeryville, CA 94608  
May 4, 1993  
Page 2 of 3

A preliminary assessment should be conducted to determine the extent of soil and/or groundwater contamination that has resulted from the former leaking tank. The information gathered by this investigation will be used to assess the need for additional actions at the site. The preliminary assessment should be designed to provide all of the information in the format shown in the attachment at the end of this letter, which is based on the RWQCB's guidelines. You should be prepared to install at a minimum, three monitoring wells to establish gradient direction of the groundwater at the site. One of the wells should be installed within 10 feet downgradient of the former tank location. Monthly water elevation reading for the first six months (reduced to every quarter) is necessary to determine groundwater flow direction and quarterly sampling for target compounds (TPH diesel, benzene, ethyl benzene, toluene & xylene) must occur to determine extent of the groundwater contamination.

Until cleanup is complete, you will need to submit reports to this office and to RWQCB every three months (or at a more frequent interval, if specified at any time by either agency). These reports must include information pertaining to further investigative results; the methods of cleanup actions implemented to date; and the method and disposal of any contaminated material. Copies of manifests for such disposal must be sent to this office. Stockpiled soil from the pit may not be used to backfill these holes without authorization from this office. Only clean fill can be used to backfill the excavation pit. Please provide our office with documentation of the stockpiled soil disposal and the manifest for the underground storage tank disposal.

Your work plan must be submitted to this office no later than **June 18, 1993**. All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project. Copies of the reports and proposals must also be submitted to:

Rich Hiett  
RWQCB, San Francisco Bay Region  
2101 Webster Street, Fourth Floor  
Oakland, California 94612

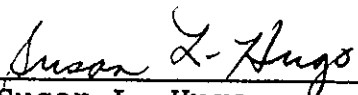
Because we are overseeing this site under the designated authority of the Regional Water Quality Control Board, this letter constitutes a formal requests for technical reports pursuant to California Water Code Section 13267(b). Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency or RWQCB.

Mr. Don Mammini  
RE: 1465 65th Street, Emeryville, CA 94608  
May 4, 1993  
Page 3 of 3

Enclosed is a copy of Appendix A (Workplan for Initial Subsurface Investigation - August 20, 1991) for your reference.

Should you have any questions regarding this letter, please contact me at (510) 271-4530.

Sincerely,

  
\_\_\_\_\_  
Susan L. Hugo  
Senior Hazardous Materials Specialist

Enclosures

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health  
Gil Jensen, Alameda County District Attorney's Office  
Rich Hiett, San Francisco Bay RWQCB  
Edgar B. Howell, Chief, Hazardous Materials Division / file



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Director



Department of Environmental Health  
Hazardous Materials Division  
80 Swan Way, Room 200  
Oakland, CA 94621

R054

6 February, 1989

Telephone Number: (415) 271-4320

Joseph T. Ryerson and Son Incorporated  
1465 65th Street  
Emeryville, Ca. 94608  
Attn: Don Mammini

Dear Mr. Mammini:

It is the opinion of the Alameda County Department of Environmental Health, Hazardous Materials Division, that the paved asphalt surface of your lot would not be sufficiently impervious to satisfy the requirements of Title 22 of the California Code of Regulations pertaining to the construction of a secondary containment system. Consequently, we recommend that a concrete slab be utilized for this purpose.

We have recently become aware of the fact that your underground storage tank is equipped with a suction, rather than a pressurized delivery system. The requirement for an on-line continuous leak detector stated in our letter of 19 January, 1989, was based on the assumption that your delivery system was pressurized. Such a detector is not required for suction delivery systems.

A leak in a suction delivery system will be evidenced by a noticeable reduction in the rate that fuel is dispensed from your pump. Please inform your employees accordingly so that any developing leak will be readily recognized.

If you have any questions regarding these matters, please contact, Dennis Byrne, Hazardous Materials Specialist, at (415)271-4320.

Sincerely,

Rafat A. Shahid, Chief,  
Hazardous Materials Division

RAS:DB

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Director



Department of Environmental Health  
Hazardous Materials Division  
80 Swan Way, Room 200  
Oakland, CA 94621

R054

Telephone Number: (415) 271-4320

6 February, 1989

Joseph T. Ryerson and Son Incorporated  
1465 65th Street  
Emeryville, Ca. 94608  
Attn: Don Mammini

Dear Mr. Mammini:

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A leak in a suction delivery system will be evidenced by a noticeable reduction in the rate that fuel is dispensed from your pump. Please inform your employees accordingly so that any developing leak will be readily recognized.

If you have any questions regarding these matters, please contact, Dennis Byrne, Hazardous Materials Specialist, at (415)271-4320.

Sincerely,

*Rafat A. Shahid*  
Rafat A. Shahid, Chief,  
Hazardous Materials Division

RAS:DB

ALAMEDA COUNTY  
HEALTH CARE SERVICES

DAVID J. KEARS AGENCY

~~CAROLYN LESTER~~, Agency Director



Department of Environmental Health  
Hazardous Materials Division  
80 Swaney, Room 200  
Oakland, CA 94621

R054

Certified Mailer # 833 981 163

Telephone Number: (415) 271-4320

19 January, 1989

Joseph T. Ryerson and Son, Inc.  
1465 65th St.  
Emeryville, Ca. 94608  
ATTN; Don Mammini

\*\*\*\*NOTICE OF VIOLATION\*\*\*\*

Dear Mr. Mammini:

As per the discussion between yourself and two members of our staff conducted on the 6th of January, 1989, the following actions will be required to ensure that your 10,000 gallon underground storage tank is operated in a manner consistent with applicable law.

1) The installation of a continuous electronic leak detector. Your current leak detection methods consist of an annual precision test and a daily inventory reconciliation. Including a continuous leak detector will bring you into compliance with monitoring alternative 5, as stipulated in Title 23 of the California Code of Regulations.

Section 2641 (5)(D) of the CCR, Title 23, states that all pressurized pipelines shall be monitored using an automatic on-line pressure loss detector and flow restriction device. The detector shall be connected to an audible/visual alarm system.

2) A spill catchment basin must be constructed surrounding the tank fill-pipe to prevent the accidental introduction of fuel into the subsurface environment during the replenishment of the tank contents. The requirement is in conformance with the general construction standards for underground storage tanks as stated in Section 2635 (8)(a) and (c) of the CCR, Title 23. This catchment basin must be equipped with a level sensing device that continuously monitors and indicates the liquid level in the underground storage tank and an automatic shut-off device that stops the flow of product being delivered to the tank when full.

The following discrepancies were observed during an annual hazardous waste generator inspection. As per Section 66508 (3)(a)(b) and (c) of the CCR, Title 22, all hazardous waste containers must be labeled with the words Hazardous Waste and must identify the material being contained.

Joseph T. Ryerson and Son, Inc.  
1465 65th St.  
Emeryville, Ca. 94608  
19 January, 1989  
Notice of Violation  
Page 2 of 3

The area in which hazardous waste materials are stored must have a secondary containment system, such as a concrete berm, to prevent the inadvertent release of material to the environment in the event that a container is ruptured or spilled. As per Section 67245 (b) of the CCR, Title 22, the containment system must be on a base which is sufficiently impervious to contain spills, leaks and accumulated precipitation until the collected material can be removed. The base shall be sloped or the containment system shall be otherwise designed and operated to drain and remove liquids resulting from leaks, spills or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquids. The capacity of the system shall be sufficient to contain precipitation from at least a 24-hour, 25-year storm plus 10 percent of the aggregate volume of all containers or the volume of the largest container, whichever is greater.

As stipulated in Section 66492 (a) of the CCR, Title 22, all records of hazardous waste collections at your facility must be kept on the premises for a period of three years. An inspector from our office will request an opportunity to review these records during your annual generator inspection.

Please submit a Plan of Correction to our office on or before the 20th of February, 1989. This Plan should address each of the issues outlined in this letter. In addition, a written statement signed by a registered civil engineer to the effect that the secondary containment system at your facility is sufficiently designed to meet the constructions requirements specified in Title 22 of the California Code of Regulations. This written statement is mandated by Section 67245 (5)(c) of the CCR, Title 22.

Please give this matter your immediate attention. Sections 25189, 25190 and 25191 of the California Health and Safety Code provide for civil and criminal penalties of up to \$25,000.00 per day, per violation.

Joseph T. Ryerson and Son, Inc.  
1465 65th St.  
Emeryville, Ca. 94608  
19 January, 1989  
Notice of Violation  
Page 3 of 3

We in the Alameda County Department of Environmental Health, Hazardous Materials Division are eager to assist you in ensuring that this situation is resolved in an expedient and responsible manner. If you have any questions or require further clarification concerning the actions needed to address the discrepancies noted in this letter, please contact, Dennis Byrne, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,

*Rafat A. Shahid*

Rafat A. Shahid, Chief,  
Hazardous Materials Division

RAS:DB

cc: Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Agency.  
Norm Healy, Alameda County, Consumer and Environmental  
Protection Agency.  
Lisa McCann, SFBRWQCB  
Jim Eversole, Emeryville Fire Department