

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



12-16-03

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 587-6700  
FAX (510) 337-9335

RO0000167

December 15, 2003

Mr. Bob Webster  
David Bohannon Organization  
Sixty 31<sup>st</sup> Ave  
San Mateo, CA 94403-3497

RE: RAP Work Plan Approval for 575 Paseo Grande, San Lorenzo, CA

Dear Mr. Webster:

I have completed review of Secor's December 2003 *Remedial Action Work Plan Addendum* prepared for the above referenced site. The proposed work was discussed in our November 5, 2003 meeting. Although this agency is not requiring active remedial action to enhance natural biodegradation at the site, the owners will implement hydrogen peroxide injection and nitrate injection to expedite closure and potential sale of the property.

Secor's proposal to inject hydrogen peroxide in the vicinity of well MW-3, and to inject nitrate along the southwest property line is acceptable. Field work may commence within 90 days of the date of this letter, or by March 22, 2004. Please provide at least 72 hours advance notice of field activities. If you have any questions, I can be reached at (510) 567-6762 or by email at [eva.chu@accgov.org](mailto:eva.chu@accgov.org).

eva chu  
Hazardous Materials Specialist

c: Donna Drogos  
email: Neil Doran, Secor

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



23-03

RO0000167

April 23, 2003

Mr. Mike Jepsen  
David Bohannon Organization  
Sixty 31<sup>st</sup> Ave  
San Mateo, CA 94403-3497

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

RE: Preferential Pathway Study for 575 Paseo Grande, San Lorenzo, CA

Dear Mr. Jepsen:

I have completed review of the case file for the above referenced site, including the recent reports *Fourth Quarter 2002 Groundwater Monitoring Report* and *Limited Subsurface Investigation Report and Work Plan for Additional Soil and Groundwater Assessment*, both prepared by Secor. The latter report included a work plan to better define the lateral extent of water-bearing sediments in the "A", "B", and "C" zones in three phases.

The proposed investigations appear excessive and not acceptable to implement at this time. Rather, you should have your consultant conduct a preferential pathway study which includes a water well survey within 2000 feet of the site, and a conduit study (location and depth of sewer, storm drain, electrical, water lines, etc and location of surface water bodies). The findings should be incorporated into a report with recommendations and conclusions. You may find that once the potential sensitive receptors are identified, the scope of work can then be refined and more limited in extent than initially proposed. Please include in the report a rose diagram of groundwater flow direction and gradient as well as a site plan with location of former underground storage tanks, product lines and product dispensers, soil borings, and groundwater monitoring wells, and residential lots located west of the site.

The preferential pathway study must be completed and a report submitted for review within 60 days of the date of this letter, or by June 30, 2003. If you have any questions, I can be reached at (510) 567-6762 or by email at [echu@co.alameda.ca.us](mailto:echu@co.alameda.ca.us).

eva chu  
Hazardous Materials Specialist

c: Donna Drogos  
email: Neil Doran, Secor

bohannon-1

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20167

**STID 5553**

October 28, 2002

Mr. Mike Jepsen  
Bohannon Development Co.  
600 Hillsdale Mall  
San Mateo, CA 94403-3497

**ENVIRONMENTAL HEALTH SERVICES**

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

**Re: Property at 575 Paseo Grande San Lorenzo, CA 94580**

Dear Mr. Jepsen:

I have received and reviewed "Remedial Action Workplan" and "May 2002 Groundwater Monitoring Report" dated October 25, 2002, submitted by Mr. Neil Doran of Secor International Incorporated, regarding the above referenced site. Thank you for the submittal of the workplan. Please consider the following comments:

- MW-3 well, which has represented the highest concentrations of pollutants, revealed 5,400ppb TPHg, 1,000ppb benzene. MW-4 well revealed 5,100ppb of TPHg and 320 ppb of benzene.
- MTBE has not been detected in any of the wells.
- There was a decrease in the concentrations of the constituents in both MW-3 and MW-4 wells during this episode. However, overall there have been increases and decreases in the concentrations of the constituents thus implying an unstable plume.
- Depth to groundwater was calculated at 4.91 to 6.40 ft bTOC.
- Figure 3 reveals groundwater flow gradient calculation at 0.0035 ft/ft moving southwesterly direction.
- The workplan submitted is proposing to perform a pilot study in order to determine the feasibility of nitrate injection for promotion of petroleum hydrocarbon at the above site. Pending the result of pilot study a "full-scale" treatment is proposed to promote remediation of the plume. This work plan is acceptable to this office.

Please call me at (510) 567-6876, if you have any questions and or concerns.

Sincerely,

A handwritten signature in black ink that reads "Amir K. Gholami". The signature is written in a cursive style and is underlined with a single horizontal line.

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mr. Neil Doran, Secor International Incorporated, 1390 Willow Pass Road,  
Suite 360, Concord, CA 94520-5250  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



10-31-02

**STID 5553**

October 28, 2002

Mr. Mike Jepsen  
Bohannon Development Co.  
600 Hillsdale Mall  
San Mateo, CA 94403-3497

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

**Re: Property at 575 Paseo Grande San Lorenzo, CA 94580**

Dear Mr. Jepsen:

I have received and reviewed "Remedial Action Workplan" and "May 2002 Groundwater Monitoring Report" dated October 25, 2002, submitted by Mr. Neil Doran of Secor International Incorporated, regarding the above referenced site. Thank you for the submittal of the workplan. Please consider the following comments:

- MW-3 well, which has represented the highest concentrations of pollutants, revealed 5,400ppb TPHg, 1,000ppb benzene. MW-4 well revealed 5,100ppb of TPHg and 320 ppb of benzene.
- MTBE has not been detected in any of the wells.
- There was a decrease in the concentrations of the constituents in both MW-3 and MW-4 wells during this episode. However, overall there have been increases and decreases in the concentrations of the constituents thus implying an unstable plume.
- Depth to groundwater was calculated at 4.91 to 6.40 ft bTOC.
- Figure 3 reveals groundwater flow gradient calculation at 0.0035 ft/ft moving southwesterly direction.
- The workplan submitted is proposing to perform a pilot study in order to determine the feasibility of nitrate injection for promotion of petroleum hydrocarbon at the above site. Pending the result of pilot study a "full-scale" treatment is proposed to promote remediation of the plume. This work plan is acceptable to this office.

Please call me at (510) 567-6876, if you have any questions and or concerns.

Sincerely,

A handwritten signature in black ink that reads "Amir K. Gholami". The signature is written in a cursive style with a long horizontal stroke at the end.

Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mr. Neil Doran, Secor International Incorporated, 1390 Willow Pass Road,  
Suite 360, Concord, CA 94520-5250  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



10-12-01

20167

**STID 5553**

October 10, 2001

Mr. Mike Jepsen  
Bohannon Development Co.  
600 Hillsdale Mall  
San Mateo, CA 94403-3497

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

**Re: Property at 575 Paseo Grande San Lorenzo, CA 94580**

Dear Mr. Jepsen:

I have received and reviewed "Groundwater Well Installation Report" dated June 29, 2001, submitted by Mr. Thomas W. Crosby of Secor International Incorporated, regarding the above referenced site. I would like to make the following comments regarding this report:

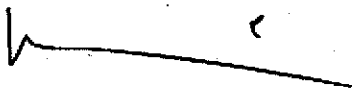
- According to this report MW-3 still reflect the highest concentrations of pollutants at 790ppb benzene, 5,400ppb of TPHg followed by MW-4 benzene concentrations of 320ppb and 3,900ppb of TPHg and MW-2 benzene concentrations of 75ppb and 800ppb of TPHg. The
- MW-4 well was the only recently installed well, which revealed significant amount of pollutant in groundwater. Furthermore, soil boring at 10 feet for this well, during well installment, revealed up to 93 PPM of TPHg as well. However, other soil borings related to MW-5, MW-6, and MW-7 wells did not reveal much contaminants.
- Per figure 3 groundwater flow gradient seems to be generally in a westerly direction .

In my previous correspondence, I requested that you submit had indicated submittal of a work plan for additional groundwater monitoring well installation. Furthermore, I asked you to submit a copy of the workplan to me. However, I did not receive this workplan. Additionally I asked you to continue submittal of quarterly groundwater sampling per the agreed upon schedule by my previous colleague. However, I have not received any quarterly monitoring report for a while. As indicated previously, I will continue the same guidelines as my previous colleague had requested in order to avoid any confusion and or interruptions.

Please submit your quarterly monitoring reports in a timely manner.

If you have any questions, please call me at (510) 567-6876.

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mr. Thomas W. Crosby, Secor International Incorporated, 1390 Willow Pass Road,  
Suite 360, Concord, CA 94520-5250  
Files



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



FEB 08 2000

cc's

20167

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6700  
(510) 337-9432

Stid 5553

February 7, 2000

Mr. Mike Jepsen  
Bohannon Development Co.  
600 Hillsdale Mall  
San Mateo, CA 94403-3497

Re: Property at 575 Paseo Grande San Lorenzo, CA 94580

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Jepsen:

This letter is to inform you of new legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, you have been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.

LANDOWNER NOTIFICATION

Re: 575 Paseo Grande San Lorenzo

February 7, 2000

Page 2 of 2

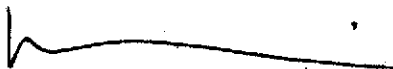
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

You may use the enclosed "notice of proposed action" form (sample letter 3) as a template to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

Please call me at (510) 567-6876 if you have any questions about the content of this letter.

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB

Attachments: Sample letter 2 and Sample letter 3, which must be filled out by the Responsible Party and mailed to Alameda County.

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SNT, Inald cc's  
3-10-2000

20167

**Stid 5553**

February 7, 2000

Mr. Mike Jepsen  
Bohannon Development Co.  
600 Hillsdale Mall  
San Mateo, CA 94403-3497

**ENVIRONMENTAL HEALTH SERVICES**

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

**Re: Property at 575 Paseo Grande San Lorenzo, CA 94580**

Dear Mr. Jepsen:

I have been assigned to oversee the clean up process at the above referenced site. I have received and reviewed the "Fourth Quarter 1999 Groundwater Monitoring Results" dated February 8, 2000, submitted by Thomas W. Crosby of Secor International Incorporated, your consultant, regarding the above referenced site. Thank you for the submittal of the report.

Per this report MW-3 has the highest concentrations of pollutants at 1400ppb benzene, 8800ppb of TPHg followed by MW-2 benzene concentrations of 110ppb and 1400ppb of TPHg. There were fluctuations in the concentrations of some of the constituents in the plume as well, as revealed by this report.

Groundwater flow gradient seems to be southwesterly.

I noted that that you indicated submittal of a work plan for additional groundwater monitoring well installation. I would appreciate it if you could send me a copy of this report. In the mean time, please continue quarterly groundwater sampling per the agreed upon schedule by my previous colleague. In general, we will continue the same guidelines as my previous colleague had requested in order to avoid any confusion and or interruptions.

I will be looking forward to receive the next report.

Should you have any questions, please call me at (510) 567-6876.

Sincerely,



Amir K. Gholami, REHS  
Hazardous Materials Specialist

C: Mr. Thomas W. Crosby, Secor International Incorporated, 1390 Willow Pass Road,  
Suite 360, Concord, CA 94520-5250  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Sent 11-5-99  
Including cc's

PO167

ENVIRONMENTAL HEALTH SERVICES

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

November 04, 1999

Michael Jepsen  
Bohannon Development Co.  
Sixty 31<sup>st</sup> Avenue  
San Mateo, CA 94403-3497

STID: 5553

Re: Workplan for additional investigations at Bohannon Development Property, located at  
575 Paseo Grande, San Lorenzo, CA 94580

Dear Mr. Jepsen,

This office has reviewed the October 22, 1999 Groundwater Monitoring and Plume Definition Investigation Report and Workplan, prepared by SECOR International, Inc. (SECOR); and the September 02, 1999 Gore-Sorber Screening Survey Report. Based on the elevated contaminant concentrations identified in Wells MW-2 and MW-3, and the results of the Gore-Sorber Screening Survey, SECOR has recommended in it's workplan that three additional monitoring wells be installed to delineate the extent of the groundwater contaminant plume. The three well locations proposed by SECOR are acceptable to this office, however, this office is requiring that one additional well be placed off site to the south, to account for the potential migration of the contaminant plume in this direction during the intermittent southerly groundwater gradients. Per my conversation with Robert Robitaille on November 04, 1999, overhead powerlines running along the southern side of Paseo Grande would inhibit drilling in these areas, however, drilling may be possible along Paseo Largavista to the south of Paseo Grande.

Groundwater samples collected from the newly installed monitoring wells, as well as the existing wells, shall be analyzed for Total Petroleum Hydrocarbons as gasoline (TPHg), dissolved lead, and benzene, toluene, ethylbenzene, and total xylenes (BTEX).

SECOR has proposed to drill the new monitoring wells down to 5-feet below the first encountered groundwater and employ a 10-foot well screen, however, the well logs for Well MW-1 and MW-2 indicate that the aquifer below the site may be confined. If this is the case, then the wells should not be screened above the first encountered groundwater because it may cause cross-contamination. If confining conditions are confirmed during the installation of the proposed monitoring wells, these wells must be screened accordingly.

In addition to the installation of additional monitoring wells, more detailed information will need to be submitted to this office on the depth and construction (including info on the backfill material) of the sewer line running along Paseo Largavista to assist us in determining whether portions of the contaminant plume are being diverted along these lines. The sewer line is of particular concern to this office because sewer lines generally lie anywhere between 4- and 8-feet below ground surface (bgs), which is commensurate to the fluctuating groundwater depths at the site (5- to 7-feet bgs). Although it would be helpful if the depths of the electric and gas lines could be obtained, these lines are not as much of a concern to this office since they generally lie

Michael Jepsen  
Re: 575 Paseo Grande  
November 04, 1999  
Page 2 of 2

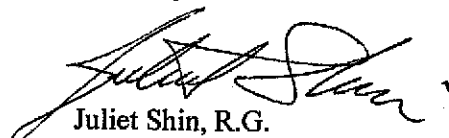
at a maximum depth of 3- to 4-feet bgs. This office is also requesting that a more detailed description of PG&E's utility vault, located on Paseo Grande, be submitted for our review. The elevated PID reading of 89ppm detected from this location suggests that elevated contaminant concentrations could be accumulating in this area.

Lastly, the analysis for bioindicator parameters is highly recommended to assist us in estimating the rate of microbial degradation in the contaminant plume.

A letter addendum to the October 22, 1999 workplan, addressing the above additional concerns, should be submitted to this office within 30 days of the date of this letter. The proposed work should commence within 45 days after our review and acceptance of the addendum. A report documenting the work should be submitted to this office within 45 days after completing field activities.

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

Sincerely,



Juliet Shin, R.G.  
Hazardous Materials Specialist

Cc: Robert Robitaille  
SECOR International, Inc.  
1390 Willow Pass Road, Ste. 360  
Concord, CA 94520-5250

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

R0167

September 15, 1999

Michael Jepsen  
Bohannon Development Co.  
Sixty 31<sup>st</sup> Avenue  
San Mateo, CA 94403-3497

STID: 5553

Re: Investigations at Bohannon Development Property, located at 575 Paseo Grande, San Lorenzo, California 94580

Dear Mr. Jepsen,

This office has reviewed SECOR International Incorporated's (SECOR) July 14, 1999 Second Quarter 1999 Groundwater Monitoring Report and the attached August 9, 1999 cover letter. The results of this last monitoring event have confirmed that groundwater is flowing to the west, towards the residential properties across Paseo Largavista Street; and that benzene concentrations on site are continuing to exceed the Tier 1 residential threshold values given in American Society for Testing and Materials' Risk-Based Corrective Action guidelines. Consequently, this office is requiring that one permanent monitoring well be placed adjacent to these residential properties across Paseo Largavista Street to monitor the contaminant levels in groundwater. If contaminant concentrations in this new well continue to identify concentrations exceeding the Tier 1 residential threshold values, then a Tier 2 risk assessment, using more site-specific values, will be required.

Per the August 9, 1999 cover letter, "a passive soil vapor survey" was "performed at the site...based, in part, on the findings of a utility trench survey." This office was not aware that the utility line survey had already been conducted and has no information as to the results of this survey. If a utility line survey was, in fact, conducted, then any information collected during this survey must be submitted to this office for review.

Per my conversation with Robert Robitaille on September 15, 1999, SECOR has recently completed the Gore-Sorber soil vapor survey and quarterly groundwater monitoring of the on-site wells. Information documenting this work should be submitted to this office by October 27, 1999. Included in this report should be a workplan addressing the installation of an additional monitoring well across Paseo Largavista Street. Please be reminded that all future reports are required to have a cover letter, signed by a representative of Bohannon Development Company (Bohannon), acknowledging that Bohannon has read the document and concurs with any recommendations made in the reports.

Based on the fact that no Methyl Tertiary Butyl Ether (MTBE) or dissolved chromium was identified in this last groundwater sampling event, no further analysis for MTBE or chromium will be required in future groundwater monitoring events. However, analysis for Total Petroleum Hydrocarbons as gasoline (TPHg), dissolved lead, and benzene, toluene, ethylbenzene, and total xylenes (BTEX) must continue.

Michael Jepsen  
Re: 575 Paseo Grande  
September 15, 1999  
Page 2 of 2

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

Sincerely,



Juliet Shin, R.G.  
Hazardous Materials Specialist

Cc: Robert Robitaille  
SECOR International Inc.  
1390 Willow Pass Road, Ste. 360  
Concord, CA 94520-5250



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO#167

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

April 02, 1999

Michael Jepsen  
Bohannon Development Co.  
Sixty 31<sup>st</sup> Avenue  
San Mateo, CA 94403-3497

STID: 5553

Re: Workplan for investigations at the Bohannon Development Property, located at  
575 Paseo Grande, San Lorenzo, California 94580

Dear Mr. Jepsen,

This office has reviewed Secor's workplan, dated March 22, 1999, for additional soil and groundwater investigations at the above site. This workplan is acceptable to this office with the following additional requirements:

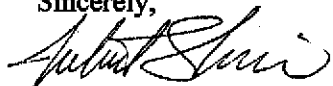
- As part of the required utility line surveys, a detailed description of the top, bottom, slope, and trench materials for any utility lines in the vicinity of the contaminant plume must be provided to this office.
- One additional Gore-Sorber must be placed on Paseo Grande Street immediately adjacent to the site; and one additional Gore-Sorber must be placed immediately to the northwest of the site.
- Per Chapter 16, Division 3, Title 23 of the California Code of Regulations, you are required to wait a minimum of 72 hours after well construction before developing the new monitoring well.
- Please be reminded to obtain permits for both the Gore-Sorbers and the proposed monitoring well from the Alameda County, Zone 7 Water Agency. You can contact Wyman Hong at (925) 484-2600.

The workplan shall be implemented within 45 days of the date of this letter. A report documenting the work shall be submitted to this office within 45 days after completing field activities. Any requests for extensions of the given due dates, or modifications of the required tasks, shall be submitted to this office in writing.

Michael Jepsen  
Re: 575 Paseo Grande  
April 02, 1999  
Page 2 of 2

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

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Greg D. Hoehn  
SECOR International, Inc.  
1390 Willow Pass Road, Ste 360  
Concord, CA 94520-5250

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20167

ENVIRONMENTAL HEALTH SERVICES

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

December 30, 1998

Michael Jepsen  
Bohannon Development Co.  
Sixty 31<sup>st</sup> Avenue  
San Mateo, CA 94403-3497

STID 5553

Re: The Bohannon Development Property, located at 575 Paseo Grande, San Lorenzo, CA 94580

Dear Mr. Jepsen,

Per our meeting on December 22, 1998, and per Article 11 Title 23 California Code of Regulations, Bohannon Development Co. (Bohannon) is required to continue quarterly groundwater monitoring of the three on-site monitoring wells (MW1 - MW3). The groundwater samples shall be analyzed for Total Petroleum Hydrocarbons as gasoline (TPHg), Methyl Tertiary Butyl Ether (MTBE) using Method 8260, lead, chromium, and benzene, toluene, ethylbenzene, and total xylenes (BTEX). If concentrations of the lead and chromium are not detected, no further sampling of these metals will be required.

Based on the last round of groundwater samples collected on September 10, 1997, benzene concentrations exceeded the human-health protective threshold values for a  $10^{-5}$  risk for both residential and commercial scenarios given in the Tier 1 Table of American Society for Testing and Materials' Risk-Based Corrective Action guidelines (E 1739-95). Based on this information, and the fact that a residential area exists immediately downgradient of the site, this office is requiring that further delineation of the contaminant plume be conducted. Groundwater depths are very shallow, and as part of the delineation procedures, you are required to determine whether any utility lines exist on site or along the street that may be intercepting a portion of the plume. This may occur due to the utility lines lying in a trench backfilled with materials that are significantly more permeable than the surrounding native soils.

The groundwater flow direction is currently uncertain based on the fact that Well MW-3 was installed partially into the permeable backfill of the former tank pit, and water level readings from this well may not be representative. Additionally, the placement of Well MW-3 into the permeable backfill may be acting as a "french drain", which may partially explain the significantly higher concentrations observed in this well. This office is requiring that you confirm the groundwater flow direction by tying elevation contours into additional monitoring wells in the future.

Based on observations made at the site on December 22, 1998, the area above the former tank pit is not currently paved. This area must be paved/capped to prevent or retard further leaching of contaminants from the soil into the groundwater, and to slow the contaminant plume migration further downgradient of the site.

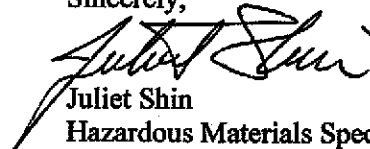
Michael Jepsen  
Re: 575 Paseo Grande  
December 30, 1998  
Page 2 of 2

Lastly, the September 14, 1995 workplan makes reference to three additional soil samples being collected on July 26, 1995 from the site. Please provide information on the depths and locations of these samples, as well as the TTLC results and signed lab analytical results.

**Quarterly groundwater monitoring must be initiated at the site immediately. A workplan for the above required work and information, must be submitted to this office within 45 days of the date of this letter, (i.e., by February 10, 1999).**

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

Sincerely,

  
Juliet Shin  
Hazardous Materials Specialist

Cc: Greg D. Hoehn, SECOR International Inc., 1390 Willow Pass Road, Ste 360, Concord,  
CA 94520-5250

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO# 167

December 4, 1996

Mike Jepsen  
Bohannon Development Co.  
60 Hillsdale Mall  
San Mateo, CA 94403-3497

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

STID 5553

Re: Investigations at 575 Paseo Grande, San Lorenzo, California

Dear Mr. Jepsen,

This office has reviewed SECOR International, Inc.'s (SECOR) Fourth Quarter 1996 Monitoring and Sampling Report, dated November 26, 1996, for the above site. The groundwater samples collected from the three on-site wells were analyzed for TPHg, TPHd, kerosene, motor oil, BTEX, chlorinated hydrocarbons (VOCs), and polynuclear aromatic hydrocarbons (PNAs). Per your request in the report, the next round of groundwater samples will only need to be analyzed for TPHg and BTEX, for the following reasons: 1) the VOCs and PNAs identified in this round of sampling were below the California Maximum Concentration Levels (MCLs) for drinking water and/or below the Preliminary Remedial Goals (PRGs) established for Tap Water by Region IX Environmental Protection Agency. Additionally, there was no toxicological information available for two of the PNAs identified at the site, phenol and 2-methylnaphthalene; 2) the concentrations of TPHd and kerosene identified at the site exhibited fuel patterns that were indicative of a lighter hydrocarbon, such as weathered gasoline; and 3) no motor oil was identified above detection limits.

Very elevated levels of benzene at 2,700 parts per billion (ppb) were identified in Well MW-3, which was drilled in the former underground storage tank (UST) excavation pit. This concentration exceeds the preliminary value for a  $1 \times 10^{-4}$  excess cancer risk for potential vapor intrusion from groundwater into buildings for a commercial site, given in the Tier 1 table of the American Society for Testing and Materials' Risk-Based Corrective Action Guidelines (E 1739-95). If commensurate levels of benzene are identified at the site in the next sampling event, then further characterization/delineation work will be required west of the site, due to the current westerly groundwater gradient and Well MW-3's close proximity to the western property boundary. By identifying and installing a well in the downgradient periphery of the observed groundwater contaminant plume, this office can better track whether the plume has stabilized and whether it is attenuating. Additionally, further investigations to the west may identify a potential off-site contributing source. The fact that elevated groundwater concentrations of benzene were identified in the former UST excavation (from Well MW-3) and Non Detect levels of benzene were identified in confirmatory soil samples collected from this excavation at

Mr. Mike Jepsen  
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~5.5-feet below ground surface, seems to suggest one or more of the following: 1) higher soil concentrations exist below the sampled 5.5-foot depth; 2) another contaminant source exists outside of the former UST excavation on site; or 3) an off-site contributing source to the observed groundwater contamination exists.

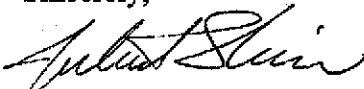
Both the November 26, 1996 Monitoring Report and the June 4, 1996 Interim Remedial Action Report mentions that the site was investigated with the anticipation of property redevelopment. This office is requesting that you submit information on the planned land use for the site and the current zoning for the site in the next monitoring report.

The above requests are consistent with Article 11 Title 23 California Code of Regulations, the California Water Code, and the San Francisco Bay Regional Water Quality Control Board's interim guidelines (please refer to attached copy of guidelines).

Lastly, all future reports should be submitted with an attached signed cover letter from you acknowledging your review of the report.

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

Sincerely,



Juliet Shin

Senior Hazardous Materials Specialist

**ATTACHMENT**

cc: Steven McCabe  
SECOR International, Inc.  
1390 Willow Pass Road, Ste 360  
Concord, CA 94520-5250

Acting Chief

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20167  
RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH  
80 Swan Way, Rm. 210  
Oakland, CA 94621  
(510) 271-4300

September 2, 1996

Mike Jepsen  
Bohannon Development Co.  
60 Hillsdale Mall  
San Mateo, CA 94403-3497

STID 5553

Re: Investigations at 575 Paseo Grande, San Lorenzo, CA 94580

Dear Mr. Jepsen,

This office has received a copy of SECOR's Report of Interim Remedial Actions, dated June 4, 1996, which describes the recent overexcavation, sampling, and well installation work at the above site. Based on our review of this report, this office has some questions and concerns regarding some of the work, and requests the following:

- o Due to the elevated contaminant concentrations identified in all three of the newly installed monitoring wells, this office is requesting that quarterly groundwater monitoring resume at the site. Groundwater samples should be analyzed for TPHg, TPH for the heavier hydrocarbon chains, BTEX, halogenated volatile organics (Method 8010), and semi-volatile organics (Method 8270). This office is also requesting that a Total Dissolved Solids (TDS) analysis be conducted on one of the groundwater samples collected in the next sampling event to help determine whether the groundwater beneath the site is potable.
- o Although the estimated groundwater flow direction is southeasterly, none of the three on-site monitoring wells are located southeast (i.e., downgradient) of any of the former piping, tanks, or sump areas. Therefore, if groundwater continues to flow towards the southeast in the next two quarterly groundwater monitoring events, at least one additional monitoring well will need to be installed southeast of the former excavation areas in order to properly address the downgradient extent of the observed groundwater contaminant plume.
- o This office is concerned that Wells MW-1 and MW-2 may not be screened properly. Based on the well logs, groundwater was initially encountered at roughly 12- to 14-feet below ground surface (bgs) in Wells MW-1 and MW-2 and then stabilized at approximately 5.5-feet bgs, which implies that the groundwater aquifer is semi-confined. If this is the case and the top of the water bearing zone lies where groundwater was initially identified, then both Wells MW-1 and MW-2

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are only screening one to two feet into the aquifer. Additionally, chlorinated hydrocarbons, which tend to sink in the aquifer due to their density, have been identified in these two wells, therefore, the short screened intervals of these wells may not be accessing the full extent of chlorinated hydrocarbons potentially existing in the aquifer. Unless adequate rationalization for the effectiveness of these screened intervals can be submitted, additional screening or wells may be necessary in these locations.

- o Lastly, this office is requesting that details of the aeration of excavated soils, including confirmatory soil sample results, be submitted to this office in future quarterly reports.

Please address the above concerns with the next quarterly groundwater monitoring report. The next groundwater monitoring event should take place within 30 days of the date of this letter, and a report documenting the sampling should be submitted within 45 days after completing field activities.

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

Sincerely,



Juliet Shin  
Senior Hazardous Materials Specialist

cc: Steven McCabe  
SECOR International Inc.  
1390 Willow Pass Road, Suite 360  
Concord, CA 94520

Acting Chief-File



**ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY**

DAVID J. KEARS, Agency Director



R0167

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

StId 5553

October 3, 1995

Attn: Mike Jepsen  
Bohannon Development Co.  
60 Hillsdale Mall  
San Mateo CA 94403-3497

Subject: Work plan for investigations at 575 Paseo Grande, San Lorenzo, CA 94580

Dear Mr. Jepsen:

This office has received and reviewed SECOR International Inc.'s work plan, dated September 14, 1995, and work plan addendum dated September 29, 1995 for a soil and groundwater investigation at the subject site. The work plan and addendum are acceptable to this office.

Implementation of this work plan should begin within 30 days from the date of this letter. A report documenting the results of this investigation is due to this office within 45 days of implementing the work plan.

Please notify this office at least 72 hours before field work begins. If you have questions or comments, please call me at (510)567-6755

Sincerely,

A handwritten signature in cursive script that reads "Amy Leech".

Amy Leech  
Hazardous Materials Specialist

c: Steve McCabe  
SECOR International Inc.  
1390 Willow Pass Rd., Suite 360  
Concord CA 94520-5250

Acting Chief of Environmental Protection - File(ALL)

**ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY**

DAVID J. KEARS, Agency Director



R0167

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

July 17, 1995

Attn: Mike Jepsen  
Bohannon Development Co.  
60 Hillsdale Mall  
San Mateo CA 94403-3497

StId 5553

Subject: Required investigations at 575 Paseo Grande, San  
Lorenzo, CA 94580

Dear Mr. Jepsen:

This office has received and reviewed Secor International Inc.'s Preliminary Characterization Report dated June 29, 1995. This report documented soil sampling and excavation activities that occurred at the subject site in June 1995.

Based on exploratory excavation results, an abandoned underground storage tank (UST) pit, fuel delivery system piping, and a waste oil/grease sump were discovered at this site. Soil samples were collected and analyzed from these areas. Lab analysis results of soil samples collected from the UST pit identified contaminant levels as high as 860 parts per million (ppm) Total Petroleum Hydrocarbons as mineral spirits (TPHms) interpreted to be degraded gasoline, 1.1 ppm benzene, 2.4 ppm toluene, 4.9 ppm ethylbenzene, 14 ppm Total xylenes (BTEX), and 1,300 ppm lead. Lab analysis results of soil samples collected from the pipeline trenches identified contaminant levels as high as 7,800 parts per million (ppm) Total Petroleum Hydrocarbons as mineral spirits (TPHms) interpreted to be degraded gasoline, 3.1 ppm benzene, 12 ppm toluene, 55 ppm ethylbenzene, 200 ppm Total xylenes, and 1,300 ppm lead. Lab analysis results of soil samples collected from the grease sump excavation identified contaminant levels as high as 2,200 parts per million (ppm) Total Petroleum Hydrocarbons; 1,100 ppm Total Petroleum Hydrocarbons as kerosene (TPHk); 660 Total Petroleum Hydrocarbons as motor oil (TPHmo); trace concentrations of BTEX; and 37, 3,900, 700, 4,900, 5,200 ppm cadmium, Total chromium, lead, nickel, and zinc, respectively.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that soil and ground water investigations be conducted when there is evidence to indicate that a release from an UST will impact or may have impacted the ground water.

Jepsen

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You are required to conduct a **Preliminary Site Assessment (PSA)** to determine the lateral and vertical extent and severity of both **soil and ground water** contamination resulting from the 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 Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, and be consistent with requirements set forth in Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached **Appendix A**. The major elements of the guidelines include, but are not limited to, the following:

- o At least one permanent ground water monitoring well must be installed within 10 feet of the observed soil contamination, oriented in the confirmed downgradient direction relative to groundwater flow. In the absence of neighboring monitoring wells located within 100 feet of the site, or any other 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, (i.e., Mean Sea Level) with an accuracy of 0.01 foot. Ground water samples are to be collected and analyzed quarterly, and water level measurements are to be collected monthly for the first three months, and then quarterly thereafter. If the initial ground water elevation contours indicate that ground water flow directions vary greatly then you will be required to continue monthly water level measurements until the ground water gradient behavior is known. Both soil and ground water samples must be analyzed for TPHg, TPHs, TPHk, TOG, BTEX, and heavy metals (Cd, Cr, Pb, Ni, Zn).

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. The RWQCB may choose to take over as lead agency if it is determined, following the completion of the initial

Jepsen  
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assessment, that there has been a substantial impact to ground water.

In order to properly conduct a site investigation, you are required to obtain professional services of a reputable environmental consultant. All reports and proposals must be submitted under seal of a California-Registered Geologist, - Certified Engineering Geologist, or -Registered Civil Engineer.

The PSA proposal is due within 60 days of the date of this letter or by September 15, 1995. Once the proposal is approved, field work should commence within 30 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". Such quarterly reports are due the first day of the second month of each subsequent quarter.

The referenced initial and quarterly reports must describe the status of the investigation and must include, among others, the following elements:

- o Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of ground water contamination characterization.
- o Interpretations of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations or plans for additional investigative work or remediation.

Please be advised that this is a formal request for a work plan pursuant to Section 2722 (c) (d) of Title 23 California Code of Regulations. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

Additionally, you are required to submit documentation regarding

Jepsen

Re: 575 Paseo Grande, San Lorenzo

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the following items. This documentation must be submitted within 15 days of the date of this letter.

1. Complete the "Underground Storage Tank Unauthorized Release (Leak)/Contamination Site Report" (blank form attached)
2. Manifests for the disposal of soil excavated from the former UST pit, pipe trenches, and grease sump area.

If you have any questions or comments, please contact me at (510) 567-6755.

Sincerely,



Amy Leech

Hazardous Materials Specialist

**ATTACHMENTS**

c: Thomas Peacock, Acting Chief of Environmental Protection -  
File (ALL)