ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

F

January 19, 2007

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

Mr. Jeff Rubin
Port of Oakland
530 Water St.
Oakland, CA 94604-2064

Dear Mr. Rubin:

Subject: Fuel Leak Cases RO0000010 and RO0000185, 2277 and 2225 7th St., Oakland, CA 94607

Alameda County Environmental Health (ACEH) has reviewed the case file for the subject site including the September 2006 First Quarter Groundwater Monitoring and Remediation System Operation and Maintenance Report and the November 16, 2006 Technical Memorandum Results of Low Vacuum Enhancement Pilot Study prepared by Baseline. We have the following comments and request that you submit the technical reports requested below.

TECHNICAL COMMENTS

1. We have reviewed the referenced reports and it appears that the low vacuum enhancement to the extraction wells significantly improved the amount of free product removal from RW-3 and RW-7 while having little effect on RW-6. Additional modifications have been proposed to further optimize free product removal from the recovery wells. Our office concurs with the proposed low vacuum enhancement and modifications and recommends testing the other recovery wells similarly.
2. We have not received as requested a work plan for the installation of replacement wells on the east portion of the site. Please submit as requested below.

TECHNICAL REPORT REQUEST

- February 19, 2007- Work plan for the installation of replacement wells on the east portion of the sites.

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site can be provided when requested in the County's "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic

submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

If you have any questions, please call me at (510) 567-6765.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: files, D. Drogos
Mr. James McCarty, Baseline, 5900 Hollis St., Suite D, Emeryville, CA 94608-2008
1_19_07 2225&2277 7th St

RO187

F

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

January 19, 2007

ENVIRONMENTAL HEALTH SERVICES
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Mr. Jeff Rubin
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530 Water St.
Oakland, CA 94604-2064

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If you have any questions, please call me at (510) 567-6765.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: files, D. Drogos
Mr. James McCarty, Baseline, 5900 Hollis St., Suite D, Emeryville, CA 94608-2008
1_19_07 2225&2277 7th St

CAMBRIA

September 18, 2006

Mr. Jerry Wickham
Alameda County Health Care Services
Department of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Alameda County
SEP 22 2006
Environmental Health

Re: **Project Manager Contact Change**
Former Chevron Station 9-7127
I-580 and Grant Line Road
Tracy, California

Dear Mr. Wickham:

On behalf of Chevron Environmental Management Company (Chevron), Cambria Environmental Technology, Inc. (Cambria) is writing to inform you of management changes regarding the above referenced site.

The Chevron project manager is changing from Satya Sinha to Dana Thurman.

- Mr. Dana Thurman, Chevron Environmental Management Company, K2236, P.O. Box 6012, San Ramon, CA 94583, (925) 842-9559, dthurman@chevron.com

The Cambria project manager is changing from Laura Genin to Laura Heberle.

- Ms. Laura Heberle, 2000 Opportunity Drive #110, Roseville, CA 95678, (916) 677-3407 extension 113, lheberle@cambria-env.com

Please note these changes, effective immediately, for future correspondence. Thank you for your assistance.

Sincerely,
Cambria Environmental Technology, Inc.

Laura Heberle
Senior Staff Geologist

cc: Mr. Dana Thurman, Chevron Environmental Management Company, San Ramon, CA
Ms. Christyl Escarda, Regional Water Quality Control Board, Rancho Cordova, CA
Mr. Ardavan Onsori, 29310 Union City Blvd., Union City, CA 94587

R:\9-7127 Tracy from Daimond Grp\9-7127 PM Change Letter.doc

Cambria Environmental Technology, Inc.

2000 Opportunity Drive
Suite 110
Roseville, CA 95678
Tel (916) 677-3407
Fax (916) 677-3687

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

7

March 23, 2006

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

Mr. Jeff Rubin
Port of Oakland
530 Water St.
Oakland, CA 94604-2064

Dear Mr. Rubin:

Subject: Fuel Leak Cases RO0000010 a[redacted]2277 and 2225 7th St., Oakland, CA 94607

Alameda County Environmental Health (ACEH) has reviewed the case file for the subject site including the January 2006 Fourth Quarter Groundwater Monitoring Report prepared by Baseline. We concur with the recommendation to change the monitoring schedule from quarterly to semi-annually. We have the following comments and request that you submit the technical reports requested below.

TECHNICAL COMMENTS

1. We concur with the proposal to install ORC socks into MW-4 given the historic low levels of TPHg and BTEX detected in this well.
2. We concur with the proposal to perform a pilot test using low vacuum to optimize free product removal from recovery wells.

TECHNICAL REPORT REQUEST

- April 21, 2006- Report on the removal of free product from the recovery wells, including the amount removed from each well and cumulative amount.
- August 15, 2006- First Semi-annual monitoring report
- January 2, 2007- Second Semi-annual monitoring report and work plan for the installation of replacement wells on the east portion of the sites.

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AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement

including administrative action or monetary penalties of up to $10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6765.

Sincerely,

Barney M Chan

Barney M. Chan
Hazardous Materials Specialist

cc: files, D. Drogos
Mr. James McCarty, Baseline, 5900 Hollis St., Suite D, Emeryville, CA 94608-2008

3_23_06 2225&2277 7th St

BASELINE
ENVIRONMENTAL CONSULTING

RO10
RO187

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8 March 2006
Y5395-02.00374

Alameda County
MAR 10 2006
Environmental Health

Mr. Barney Chan
Hazardous Materials Specialist
Division of Environmental Protection
Department of Environmental Health
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, 2nd Floor
Alameda California 94506

Subject: Request for Reduction in Groundwater Monitoring Frequency, 2225 and 2277 Seventh Street, Port of Oakland, LOP Case Numbers RO0000185 and RO0000010

Dear Mr. Chan

This letter presents a request on behalf of the Port of Oakland ("Port") for approval to reduce the frequency of groundwater monitoring at two adjacent Port properties: 2277 and 2225 Seventh Street in Oakland, California (Figure 1). Releases of petroleum hydrocarbons in the past from underground storage tanks ("USTs") at these two sites have resulted in impacts to the groundwater. Regulatory oversight of the two sites is being provided by the Alameda County Health Care Services Agency ("County") under the Local Oversight Program ("LOP").

The USTs at 2277 and 2225 Seventh Street were used to store diesel, gasoline, waste oil, and motor oil and were removed between 1990 and 1993. In the early 1990s, groundwater monitoring wells were installed to monitor groundwater quality. Eight wells were installed at 2277 Seventh Street (MW-1 through MW-8; MW-8 was replaced by MW-8A in 2001) and three wells were installed at 2225 Seventh Street (MW-1 through MW-3). The petroleum hydrocarbon plume is co-mingled and consists of dissolved- and free-phase hydrocarbons in the diesel range. One well (MW-4) on the 2277 Seventh Street property has historically contained dissolved hydrocarbons in the gasoline range. A product skimming system was installed in 1996 to recover the free-phase product. The system consisted of two "passive" free-product simmers and one "active" free-product skimmer. The passive skimmers collected product in reservoirs within each well, which were periodically emptied. The active skimmer pumped product using compressed air from the subsurface into an aboveground storage tank. In addition to the tank, the system included a 7.5-horse power air compressor and a pump controller.

The two properties are currently undergoing redevelopment. Groundwater monitoring wells MW-6 and MW-7 at 2277 Seventh Street and MW-1, MW-2, and MW-3 at 2225 Seventh Street were abandoned in 2002 to facilitate this redevelopment. The buildings that were located on the properties have been demolished and a new Port facility, the Harbor Facilities Center, was completed on the western portion of the properties in late 2004. The remaining eastern portions of the two properties are being prepared for development for transportation related facilities.

In 2003, the original remediation system was removed and ultimately replaced in December 2004 with an improved new product recovery system, consisting of nine recovery wells. The new system consists of nine product recovery wells (RW-1 through RW-9, Figure 2) in subsurface vaults and equipped with

active skimmer pumps. These pumps are also air actuated and the new system consists of an aboveground 500-gallon storage tank, a 7.5 horsepower compressor and a programmable pump controller. In addition, the well vaults are equipped with conveyance piping to allow the application of a low vacuum on the wellhead. The final site remedial action plan prepared in May 2002 by Innovative Technical Solutions, Inc. proposed up to eight new monitoring wells to replace the wells removed during redevelopment of the properties. The Port is evaluating data from past investigations to determine the optimal number and location of new groundwater monitoring wells. The Port anticipates completing the construction of the eastern portion of the properties as container storage and shipping facility by the end of this year, at which time the replacement wells would be installed.

Groundwater monitoring has been performed at 2277 Seventh Street since 1994 and at 2225 Seventh Street since 1993. As shown on the attached graphs, the total petroleum hydrocarbons ("TPH") as diesel, TPH as gasoline, and benzene results indicate that the petroleum hydrocarbon plume is stable, since the concentration of chemical constituents has remained within the historical ranges. Free-phase product is confined to the wells that had previously contained free product. The low levels of TPH as gasoline and benzene concentrations are primarily confined to the area of MW-4. The low concentrations of TPH as diesel reported in the groundwater samples from MW-5 and MW-8A appear to be aged and weathered, as the laboratory has consistently reported that the chromatograms do not match the diesel standard.

Based on the fact that the concentrations of dissolved-phase petroleum hydrocarbons in the groundwater are not increasing and the plume is not migrating, it is recommended that the frequency of groundwater monitoring for the existing wells be reduced to semi-annual. Contingent on approval from the County, the groundwater sampling would be performed on the following schedule:

First Semi-Annual Event	June/July 2006
Second Semi-Annual Event	November/December 2006

The sampling schedule for new wells would be based on the County's approval of a groundwater well construction and sampling plan prior to installation of the new wells. The Port will also explore the use of low vacuum to enhance product recovery. A short duration pilot study will be performed within the next two months to evaluate the benefit of modifying the system to include vacuum enhanced product recovery. In addition, to address the TPH as gasoline and benzene reported in the groundwater at MW-4, the Port will place a sock containing Oxygen Releasing Compound™ ("ORC"), a product developed by Regenesis, to promote in-situ biodegradation of the TPH as gasoline. The sock will be removed two weeks prior to sampling the well. Further use of ORC as a remediation methodology will be evaluated in the first semi-annual report.
We will look forward to any comments you may have on this request. Please contact us at your convenience with any questions.

Sincerely,

Yane Nordhav, P.G.
Principal

James McCarty, P.E.
Project Engineer

YN:JM:cr

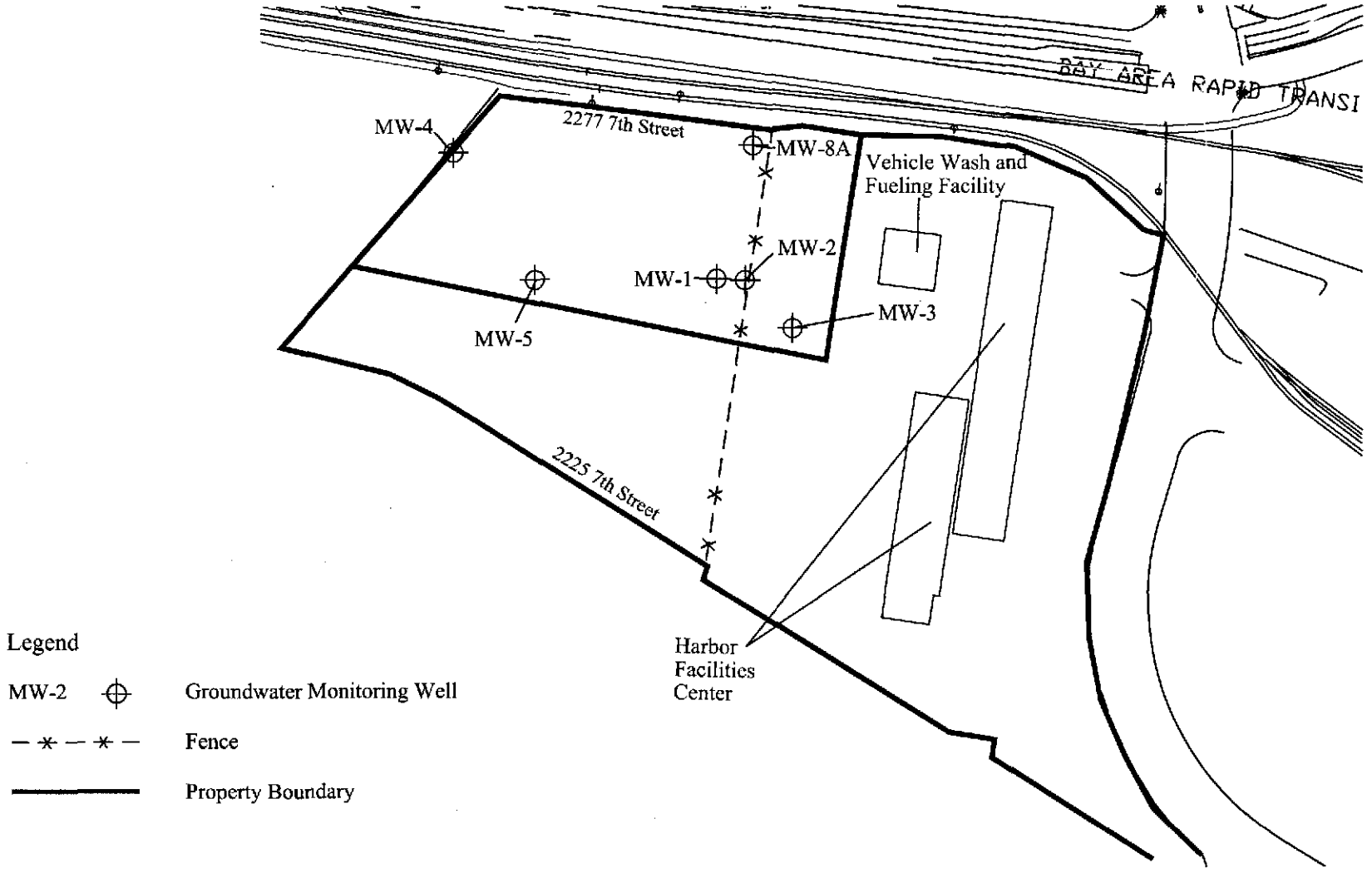
Attachments

cc: Jeffrey Rubin, Port of Oakland
Jeff Jones, Port of Oakland

Michele Heffes, Port of Oakland
Kathryn Purcell, Science Applications International Corporation
Al Notary, P.E., L.S., Brown and Caldwell
Christine Noma, Wendel, Rosen, Black, & Dean, LLP
Deborah Ballati, Farella Braun + Martel LLP
Robert Edwards, Zurich North America
Phil King, Meckler Bulger & Tilson LLP

SITE PLAN

Figure 1

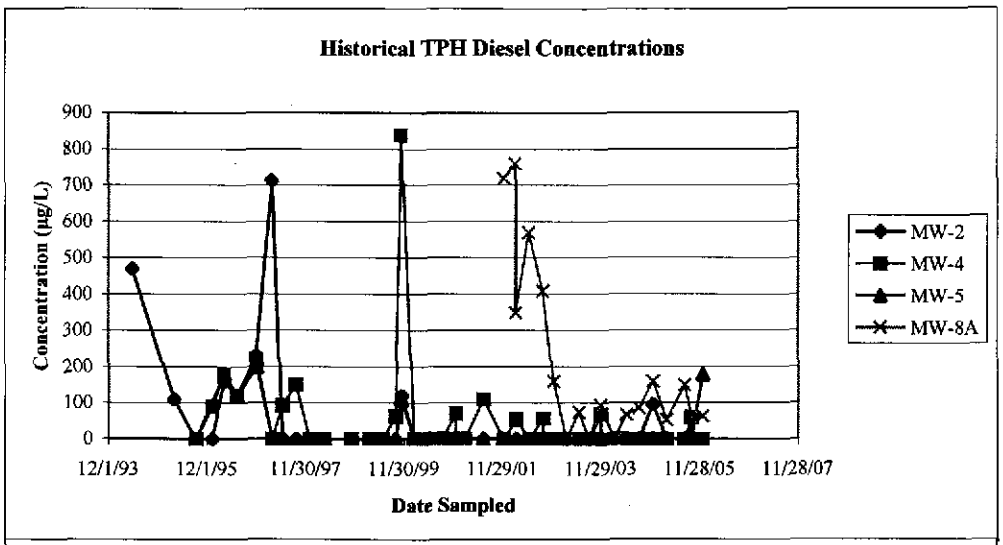


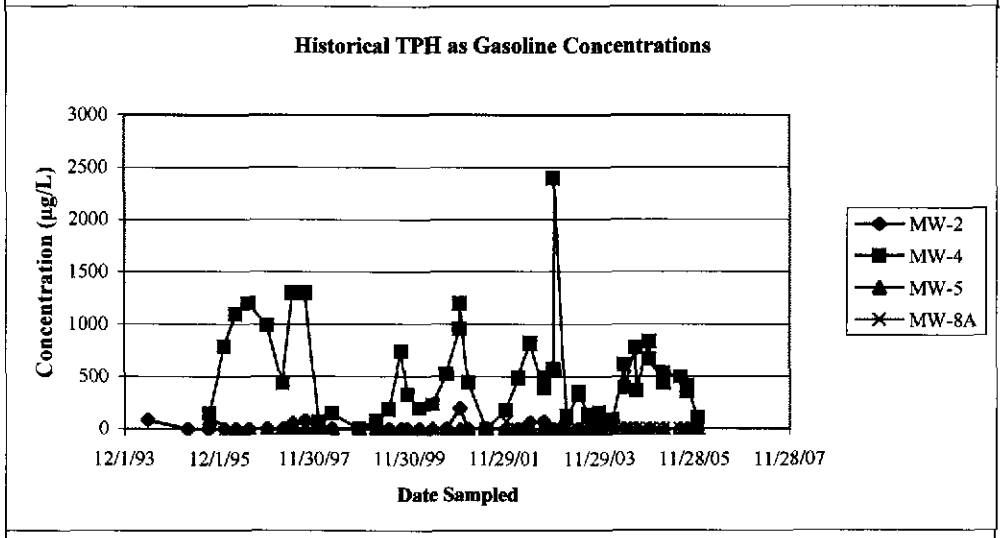
2277 and 2225 Seventh Street
Port of Oakland
Oakland, California

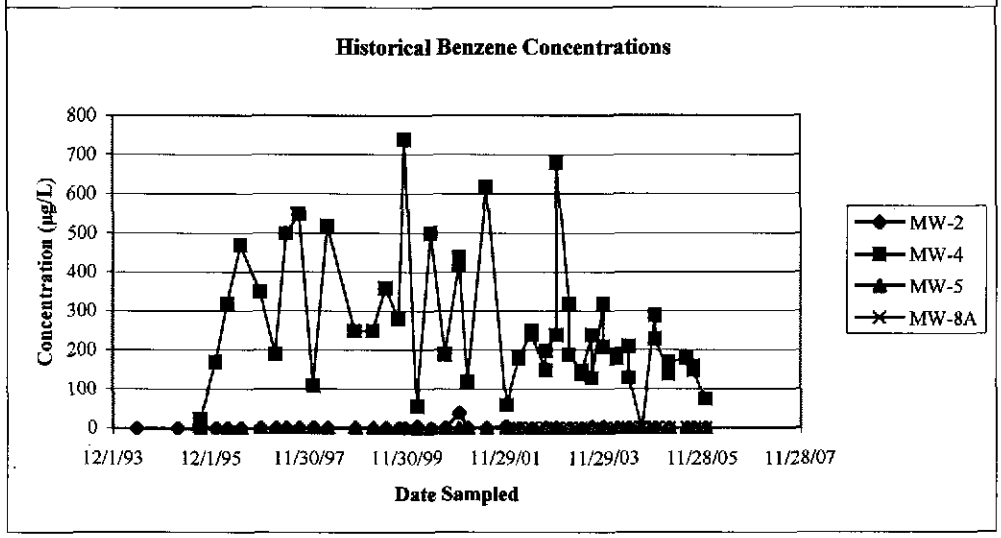
BASELINE

Y5395-02.00374.Fig1.dwg 3/1/06

Historical Groundwater Data
2277 Seventh Street, Oakland
Port of Oakland







Chan, Barney, Env. Health

To: DWhitworth@rb2.swrcb.ca.gov; dcrater@portoakland.com

Subject: Water Board letter, November 1, 2004, Port of Oakland Berths 57, 58 & 59

Mr.Whitworth and Ms. Crater:

Alameda County Environmental Health (Ms. D. Drogos) was copied with the referenced November 1, 2004 Water Board letter. In this letter, there are coments and requests for two sites, referred to as TOFC and UPMF Areas. These areas are believed to be in the County's local oversight program, referenced as 2277 7th St., RO0000010 and 2225 7th St., RO0000187. We had been in contact with Mr. Jeff Rubin of the Port. This is the area of the new FSSC , Field Support Services Complex. Is it the intention of the Board to take the oversight of these two LOP sites? If so, please formally make this request with the concurrence of the Port, so we may transfer the sites and update our database.

Sincerely

Barney M. Chan
Hazardous Materials Specialist
Alameda County Environmental Health
510-567-6765

California Regional Water Quality Control Board
San Francisco Bay Region

Terry Tamminen
Secretary for Environmental Protection

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
http://www.swrcb.ca.gov/rwqcb2

Arnold Schwarzenegger
Governor

Date: November 1, 2004
File No: 01S0590 (DW)

Port of Oakland
Attn: Ms. Dawn Crater, Project Manager (dcrater@portoakland.com) 510-451-5916 fax
Environmental Health & Safety Compliance
530 Water Street
Oakland, CA 94607

SUBJECT: Port of Oakland, Berths 57, 58 and 59 Terminals, Oakland, Alameda County - Request for Workplan to Investigate and Evaluate Remediation of Groundwater Contamination

Dear Ms. Crater:

This letter requests that you submit a workplan to investigate the source of and extent of groundwater contamination at the subject sites. As explained below, this information will help Water Board staff determine if remedial actions or long term monitoring is required at these sites.

On May 28, 2003, Water Board staff requested the Port of Oakland to expand is monitoring program to cover releases in the Trailer on a Flat Care (TOFC) area and the Union Pacific Motor Freight (UPMF) sites. Both these sites were sources of diesel hydrocarbon releases that resulted in free phase and dissolved phase contamination of groundwater. This expanded monitoring program, requiring quarterly monitoring reports, covered the Berths 57, 58 and 59 terminals.

On September 15, 2004, the Port of Oakland submitted the fourth quarterly report with data consistent with the previous reports. The expanded monitoring program revealed chlorinated solvent contamination around well UO1-8 that was previously undetected, and the need for better definition of the contamination in the TOFC and UPMF areas. Based on the data provided in the quarterly monitoring reports, Water Board staff request an investigation and remedial workplan addressing the following:

TOFC Area: Definition of the downgradient edge (western edge) of the dissolved hydrocarbon plume. Currently the only downgradient wells are MW2 and MW3. We believe that a minimum of two monitoring wells would probably provide the definition required.

UPMF Area: Monitoring data summarized in the referenced report show the southernmost Bunker C product plume is adequately characterized and stable and the plume does not appear to have migrated significantly downgradient. We understand, however, that Port Maritime redevelopment plans will include reconfiguration of the existing APL terminal lease lines and

installation of new utility lines. This could impact the UPMF plume area. To determine the necessity of product remediation, a workplan to continue groundwater monitoring at existing wells and to evaluate the feasibility of remediation of this plume should be submitted.

***UO1-8 Area*:** Monitoring wells UO1-7, UO1-8, UO1-9 and UO1-10 were installed along the shoreline of Berths 57 and 58 in September 2003. Concentrations of tetrachloroethene (PCE) and related breakdown products in samples of groundwater from well UO1-8 have been consistently elevated. Levels have been at or around solubility, with the most recent PCE concentration at 150,000 µg/L. The observed concentrations suggest the presence of non-aqueous phase chlorinated solvents in the immediate vicinity of well UO1-8. These concentrations are not found in samples from the other shoreline wells (UO1-7, UO1-9, and UO1-10) or other wells in the vicinity of the impacted area. The Water Board requests a workplan describing additional investigations that will define the extent of the non-aqueous phase and dissolved-phase contamination in this area and a feasibility study of remedial alternatives.

Please submit, by November 30, 2004 a technical report containing a workplan to address all of the above issues.

This request for a technical report is made pursuant to Water Code Section 13267, which allows the Board to require technical reports from persons whose activities may have an impact on water quality. You may be subject to administrative civil liability of up to $1,000 per day pursuant to Water Code Section 13268 if you fail to respond, respond late, or submit an inadequate response. Any extension in the above deadline must be confirmed in writing by Board staff.

If you have any questions, please contact Derek Whitworth of my staff at (510) 622 2349 [e-mail dwhitworth@waterboards.ca.gov].

Sincerely,

for

Digitally signed by Stephen Hill for EO
Location: Oakland
Date: 2004.11.01 10:19:17 -08'00'

Bruce H. Wolfe
Executive Officer

cc:

Ms. Donna Drogos donna.drogos@acgov.org
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502

Mr. Mehrdad M. Javaherian mjavaherian@eticeng.com
ETIC Engineering, Inc.
1333 Broadway, Suite 1015
Oakland, CA 94612

Ms. Kathryn Purcell Purcell.k@saic.com
Science Applications International Corporation
1404 Franklin Street
Oakland, CA 94612

RO 10
RO 187

PORT OF OAKLAND

May 25, 2004

Mr. Barney Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

RE: Status Update – Installation of Soil Gas Venting System and Reinstallation of Free Product Removal System – 2225 and 2277 Seventh Street, Oakland, California

RO 187 RO 10
DH ?

Dear Mr. Chan:

This letter provides a status update for installation of the soil gas venting system and re-installation of the free-product recovery system at the Port of Oakland (Port) 2225 and 2277 Seventh Street site (site). This site is the location of the new Harbor Facilities Center (HFC), previously known as the Port Field Support Services Complex (PFSSC). The former free product recovery system was temporarily shut down to accommodate construction of the HFC. This shut down was approved by the Alameda County Health Care Services Agency (County) on March 27, 2003, contingent upon installation of a new free product removal system. This letter is being submitted in accordance with County requirements regarding the status and start up of the replacement system.

BACKGROUND

Several soil and groundwater investigations have been performed as a result of former underground storage tank releases of diesel and gasoline fuel. As a result of these fuel releases, separate phase petroleum hydrocarbon product has been identified floating on the groundwater table. Petroleum hydrocarbons, volatile organic compounds and methane in soil, soil gas and groundwater were also identified beneath the site. The Port's environmental consultant, Treadwell & Rollo, Inc., designed a soil-gas venting system to mitigate this risk beneath the building. A free product recovery system was also designed by Treadwell & Rollo to recover the product floating on the groundwater table beneath the site.

MITIGATION SYSTEM INSTALLATION STATUS AND FUTURE TASKS

The following provides a status update of the installation of the two mitigation systems.

Soil Gas Venting System

Overaa Construction (Overaa) installed the collection pipe and vapor barrier components of the soil gas-venting system beneath the new building slab. The perimeter grade beam vents have been roughed in but have not yet been finished. Additionally, the riser pipe and wind turban installation have yet to be completed. Completion of these task is scheduled for July 2004. As built drawings and an operation and maintenance plan will be prepared for the soil gas venting system upon completion.

Mr. Barney Chan
Alameda County Health Care Services Agency

May 25, 2004

Free Product Recovery System Installation

Beliveau Engineering Contractors, Inc. is currently constructing the free product recovery system under contract with Overaa and Dillard Environmental Services. The air supply and product return lines and conduit have been constructed, and the recovery wells have been installed. The wellheads and associated appurtenances have been completed inside traffic-rated boxes at each well location. The equipment compound installation will be completed by July 2004.

Free product is slow to appear in the recovery wells because they have not yet been developed. On 29 April 2004, one day after well installation, separate phase product was observed in only one of the nine recovery wells, at a thickness of 0.05 feet. Twelve days after installation, product was observed in the same well again at a thickness of 0.05 feet. Twenty days after well installation, however, free product was observed in four of the nine wells at thickness ranging from 0.02 feet to 0.10 feet. The lack of free product is likely the result of current high water table conditions, as compared to the relatively lower water tables that will occur during the summer and fall months. Well installation has also disturbed the aquifer, resulting in lack of free product.

The recovery wells will be developed by mid June. After the equipment compound is constructed, the system will be tested to confirm the air supply lines deliver air to each wellhead and air can be returned through the product return lines back to the equipment compound. Installation of the pumps and start up of the recovery system may be delayed until a greater thickness of separate phase product is observed in more of the recovery wells. Pump installation may therefore be in late summer when the water table elevation will likely drop. Procedures will be outlined to prepare the recovery wells for pump installation and system start-up at that time. If you have any questions, please call me at (510) 627-1134.

Sincerely,

Jeffrey L. Rubin, CPSS, REA
Port Associate Environmental Scientist
Environmental Health and Safety Compliance

Cc: Roger Brewer, Regional Water Quality Control Board
Rachel Hess, Innovative Technical Solutions, Inc.
Chris Alger, Iris Environmental
Glenn Leong, Treadwell & Rollo, Inc.
Jeff Ludlow, Treadwell & Rollo, Inc.
Michele Heffes, Port Legal Dept.
Mikhail Korsunsky, Port Engineering Dept.
Jeff Jones, Port Environmental Health & Safety Compliance Dept.
Roberta Schoenholz, Port Environmental Health & Safety Compliance Dept.

Chan, Barney, Env. Health

From: Jeff Rubin [jrubin@portoakland.com]
Sent: Friday, April 09, 2004 12:14 PM
To: BChan@co.alameda.ca.us; Rdb@rb2.swrcb.ca.gov
Cc: Jeff Jones
Subject: Bentonite Barriers in Utility Trenches at New Harbor Facilities Center

R010 & 185

Barney and Roger,

A couple of days ago I left voice mail messages for you that I would like to confirm with this e-mail message.

Our plans and specs for the new Harbor Facilities Center - HFC (formerly called the Port Field Support Services Complex, but the name was too long) show that the Contractor was to place bentonite barriers in all new utility trenches. These barriers were to be placed every 50 lineal feet in all trenches deeper than 6 feet below the surface grade.

The goal of course is to minimize the lateral migration of constituents in shallow groundwater along these utility corridors. Unfortunately, these barriers were not placed by the Contractor before the utility trenches were backfilled. We have therefore carefully analyzed utility line locations and required the Contractor to go back and install bentonite barriers in these utility trenches, although not at the original 50-foot intervals. Regardless, the ultimate goal to mitigate lateral migration of constituents will still be achieved, although fewer barriers will be installed.

You will receive "as builts" upon completion of the new HFC. These drawings will specify actual locations where the bentonite barriers were ultimately installed.

Please let me know if you have any questions or comments.

Thanks,
Jeff.

Jeffrey L. Rubin
Port Associate Environmental Scientist
Port of Oakland
Environmental Health and Safety Compliance
530 Water Street
Oakland, CA 94607

510-627-1134
510-451-5916 (fax)
jrubin@portoakland.com (e-mail)

PORT OF OAKLAND

December 12, 2003

Mr. Barney Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

RE: Design and Reinstallation of Free Product Removal System – 2225 and 2277 Seventh Street, Oakland, California

Dear Mr. Chan:

This letter transmits the design of the free-product recovery system to be reinstalled at the new Port of Oakland (Port) Field Support Services Complex (PFSSC) at the 2225 and 2277 Seventh Street site. The former free product recovery system was temporarily shut down to accommodate PFSSC construction. This shut down was approved by the Alameda County Health Care Services Agency (County) on March 27, 2003, contingent upon installation of a new free product removal system. The enclosed design is being submitted in accordance with County requirements, as referenced in the March 27 letter. Amendments to the design dated 30 October 2003, are also included with this submittal.

Preparation activities for installation are ongoing and system construction will begin in January 2004. If you have any questions, please call me at (510) 627-1134.

Sincerely,

Jeffrey L. Rubin, CPSS, REA
Port Associate Environmental Scientist
Environmental Health and Safety Compliance

Enclosures: Treadwell & Rollo (T&R) Free Product Recovery System Site Plan and Details (3 sheets)
T&R Amendment to RFP No. 21 Free Product Recovery System (3 pages and figure)

Cc (w encl.): Roger Brewer, Regional Water Quality Control Board
Mikhail Korsunsky, Port Engineering Dept.
Rachel Hess, Innovative Technical Solutions, Inc.
Chris Alger, Iris Environmental
Glenn Leong, Treadwell & Rollo, Inc.

Cc (w/o encl.): Jeff Jones, Port Environmental Health & Safety Compliance Dept.
Roberta Schoenholz, Port Environmental Health & Safety Compliance Dept.
Jeff Ludlow, Treadwell & Rollo, Inc.

530 Water Street ■ Jack London Square ■ P.O. Box 2064 ■ Oakland, California 94604–2064
Telephone: (510) 627-1100 ■ Facsimile: (510) 627-1826 ■ Web Page: *www.portofoakland.com*

Treadwell&Rollo

30 October 2003
Project 3561.02

Chuck Leoni
Michael Willis Architects
246 First Street, Suite 200
San Francisco, California 94105

Subject: Amendment to RFP No. 21
Free Product Recovery System
Proposed Field Support Services Complex
Port of Oakland
2225 and 2227 Seventh Street
Oakland, California

Dear Mr. Leoni:

This letter presents amendments to Request For Proposal (RFP) Number 21 concerning the free product recovery system design for the Port of Oakland Field Support Services Complex, which is currently under construction at 2225 to 2227 Seventh Street in Oakland, California. This amendment is based on a 23 October 2003 pre-construction meeting attended by Port construction and environmental personnel, Overaa Construction and Treadwell & Rollo to coordinate the installation of the free product recovery system. The following items were discussed and should be amended to RFP No. 21.

PULL CORDS

Extra pull cords shall be placed through the conduits for the return lines and the air supply lines for future use. One extra pull cord shall be installed between the termination in the treatment compound and each recovery well for both conduits. Also additional pull cords shall be installed in the two conduits between the termination in the treatment compound and the proposed future recovery well locations at the blind terminations between recovery wells RW-8 and RW-9.

WELL COORDINATES

The recovery wells shall be placed at the following project coordinates:

Recovery Well	Northing	Easting
RW-1	2121660	6037572
RW-2	2121646	6037606
RW-3	2121613	6037648
RW-4	2121583	6037690
RW-5	2121547	6037652
RW-6	2121521	6037621
RW-7	2121524	6037681
RW-8	2121476	6037661
RW-9	2121493	6037806

Utility lines for the recovery system should be installed prior to paving. If wells are installed after paving, then utility lines must be terminated close enough to well locations such than no additional paving need to be disturbed outside of well drilling and Christy Box installation.

UTILITY MARKING TAPE

Tapes shall be manufactured specifically for warning and identification of buried utility lines and shall be comprised of inert plastic specially formulated for prolonged use underground and shall be resistant to alkalies, acids and other destructive agents found in the soil. Tape shall be a minimum of 3-inches wide, purple color, and imprinted with identification in bold black letters, continuously and repeatedly, over entire tape length. Warning and identification shall be "CAUTION BURIED RECLAIMED WATER LINE BELOW."

The tape shall be 5.5-mil composition film containing one layer of metalized foil laminated between two layers of inert plastic film. Tape shall be detectable by cable locating equipment used to locate underground utility lines. The tape must be installed continuously in backfill directly over buried utility line, 6 to 10 inches below finished grade.

There are a number of suppliers that can supply this product including Utility Safeguard (http://shopping.netledger.com/s.nl/c.ACCT77762/sc.2/category.2192/it.A/id.542/.f)

DRILLING SOIL BORINGS FOR RECOVERY WELL INSTALLATION

Soil borings shall be drilled using hollow stem auger equipment and soil samples will collected from 6 to 7.5 feet bgs, 11 to 12.5 feet bgs, 16 to 17.5 feet bgs, and 20 to 21.5 feet bgs. using a split spoon sampler lined with 6-inch long by 2-inch diameter brass sleeves. Samples will be logged by a Port representative; capped with plastic end caps; labeled with the location, start and end depths, and date of collection. The final depth of the recovery wells may vary by a few feet depending on geologic conditions observed at each well location. Additional well casing shall be available to allow for modifications to the well depths, if decided by Port personnel at the time of drilling.

Prior to commencing the drilling of the soil borings and recovery well installation, a permit application package for Alameda County Water District (ACWD) must be submitted and approved. The approved permit shall be maintained at the job site. The ACWD must be notified prior to start of work and an ACWD inspector may be present for the scheduled work.

The ACWD require, at a minimum, the following:

- A drilling contractor with a valid State of California C57 License must perform the work
- The application and work plan must be signed and dated by a California Registered Geologist(RG), Certified Engineering Geologist (CEG) or Registered Civil Engineer (RCE). The signature must match the name and number of the consultant on the permit application form and work plan.

MANIFOLDING PRODUCT DISCHARGE LINES

The vertical section of the 6-inch PVC conduit that houses nine 3/4-inch oil resistant product return lines will use two 90-degree sweeping bends to change the direction of the 6-inch PVC run so that it can attach to the top of the ConVault tank. The 6-inch PVC conduit will then be reduced to a 4-inch PVC conduit so that it can attach to the 4-inch nipple on the top of the tank. The 3/4-inch oil resistant product return lines will extend two to three feet into the tank and will be labeled with the corresponding Recovery Well location number (e.g., RW-3).

We will consider a submittal from the contractor regarding a proposed manifold option for the 3/4-inch oil resistant product return lines.

LIGHTING DETAILS

For lighting details, see Electrical Site Plan, Sheet SKE-13 (attached). No telephone line is required for the equipment compound and Note 28 on drawing SKE-13 and associated underground piping is removed from the RFP No. 21.

COORDINATION OF TRENCH LOCATION

Port and contractor need to coordinate trench location with other below grade utilities to resolve conflicts prior to construction.

CHANGE TO NOTE 6

Solvent-weld PVC piping will be used in the utility trenches only. Flush threaded PVC will be used for the well casing and screen sections. No solvents or glues will be used for attachment of well casings or screen sections.

WELL CONSTRUCTION AND DEVELOPMENT

The well screen will be 4-inch diameter PVC Vee-Wire screen from Johnson Screen with a 0.050 screen slot size. Johnson Screen can be reached at http://www.johnsonscreens.com/index.asp or at the following address:

JOHNSON SCREENS
6022 State Road
Bakersfield, CA 93308
Tel: (661) 393-7233
Fax: (661) 322-6416

Medium pea gravel shall be substituted for the two foot bentonite seal at the bottom of the boring.

Well development will be performed by the drilling contractor using a downhole tool comprised of a surge block at the bottom and a jetting tool immediately above the surge block. The jetting tool will employ several horizontal jets of water operated from inside the well screen so that high-velocity streams of water exit through the screen and loosen fine-grained material and drilling mud residue from the formation. Water used in jetting must be free from contamination. Well development shall be performed in a way that minimizes mixing the free product and water column and causing the two materials to emulsify. Port personnel will observe and log the well development task.

If you have any questions or comments, please contact either of the undersigned.

Sincerely yours,
TREADWELL & ROLLO, INC.

Brian K. Moore, P.E.
Project Engineer

35610201.BM

Attachment

REGISTERED PROFESSIONAL ENGINEER
BRIAN K. MOORE
No. 57489
Exp. 2005
CIVIL
STATE OF CALIFORNIA

Jeffrey F. Ludlow, RG
Senior Project Manager

cc: Steve Low
Steve Ng
Mikhail Korsunsky
Jeff Rubin

SHEET NOTES

(24) SAME AS TYPE "M" LIGHTING FIXTURE EXCEPT 120V. PROVIDE UNISTRUT SUPPORT AS REQUIRED FOR FIXTURE MOUNTING, +7'-6" ABOVE FINISHED GRADE.

(25) PROVIDE UNISTRUT SUPPORT AS REQUIRED FOR OUTLET/ DISCONNECT SWITCH MOUNTING.

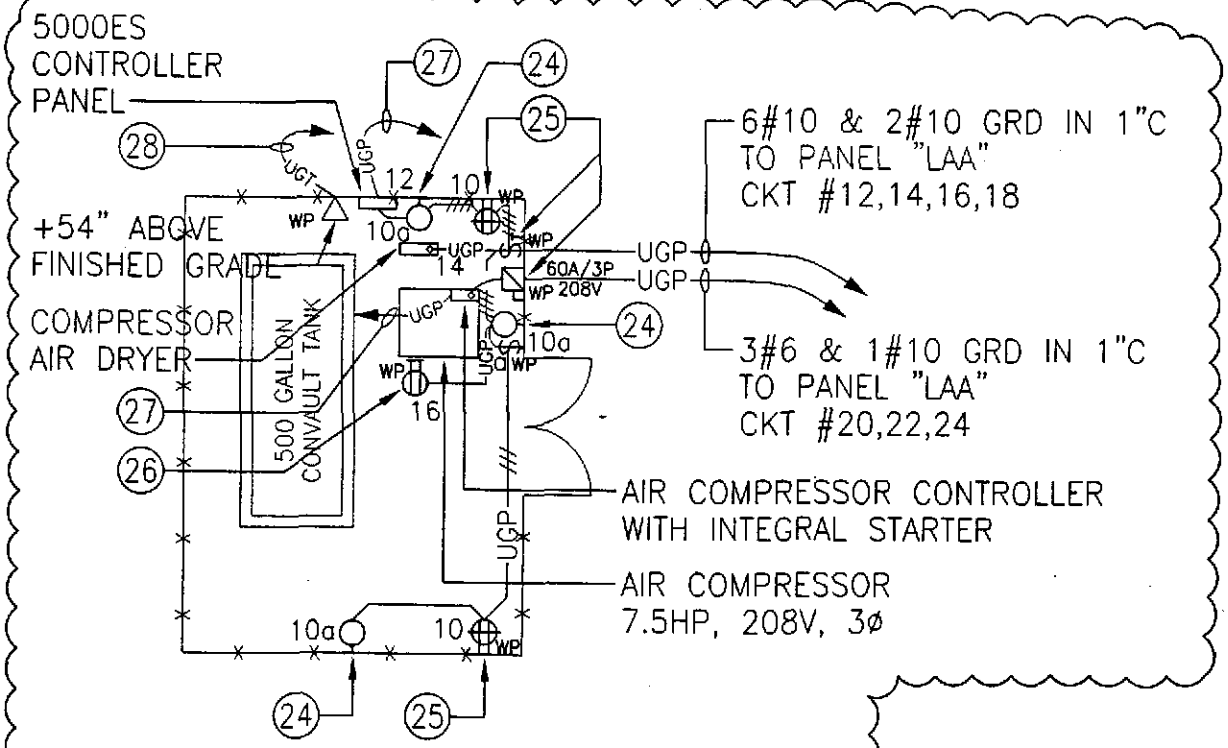
(26) OUTLET FOR ELECTRIC DRAIN VALVE. MOUNT OUTLET NEXT TO AIR COMPRESSOR. PROVIDE UNISTRUT SUPPORT AS REQUIRED.

(27) CONTRACTOR SHALL COORDINATE WITH FREE PRODUCT RECOVERY SYSTEM MANUFACTURER FOR ALL CONTROL WIRING AND INTERLOCK WIRING REQUIREMENT. PROVIDE CONDUIT & WIRING AND MAKE CONNECTIONS AS REQUIRED.

(28) 3/4"C TO TELEPHONE BACKBOARD LOCATED IN ADMINISTRATION FIRST FLOOR TELECOM ROOM.

GENERAL NOTE (THIS SHEET)

2. ALL CONDUITS INSTALLED EXPOSED TO WEATHER SHALL BE RIGID GALVANIZED STEEL CONDUITS. ALL CONNECTIONS SHALL BE MADE WATERTIGHT.



EQUIPMENT COMPOUND ENLARGED PLAN

SCALE: 1/8"=1'-0"

N

F.W. ASSOCIATES, INC.
CONSULTING ENGINEERS
68-12TH STREET, SUITE 300, SF, CA 94103-1242
PHONE: (415) 861-0266 FAX: (415) 861-0191

PROJECT: PORT FIELD SUPPORT SERVICES COMPLEX	SCALE: 1/8"=1'-0"
	DATE: 9/16/03
REFERENCE TO DRAWING NO.: E2.01	BY: MF/SM
TITLE: ELECTRICAL SITE PLAN	SKE-13

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

June 13, 2003

Mr. Jeff Rubin
Port of Oakland
530 Water St.
P.O. Box 2064
Oakland, CA 94604-2064

Dear Mr. Rubin:

Subject: Fuel Leak Cases RO0000087 and RO0000010, 2225 and 2277 7th St., Oakland, CA 94607. Future Port of Oakland Field Support Services Complex

Alameda County Environmental Health staff and staff from the Regional Water Quality Control Board have reviewed the following documents from Iris Environmental for the referenced sites.

- Human Health Risk Assessment and Abbreviated Phase II Environmental Site Assessment Report, October 2002
- Response Package and Addendum to Human Health Risk Assessment for Future Port of Oakland Field Support Services Complex, March 7, 2003 and
- Final Human Health Risk Assessment for Future Port of Oakland Field Support Services Complex, May 6, 2003.

With the concurrence of the RWQCB, our office concurs with the conclusions and the proposed mitigation measures (passive soil venting system and asphalt cap) of the final risk assessment. The cancer risk to on-site construction worker and future on-site commercial worker is expected to be below 1×10^{-5}.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, D. Drogos
Mr. C. Alger, Iris Environmental, 1615 Broadway, Suite 1003, Oakland, CA 94612
Mr. Roger Brewer, SFRWQCB
HHRA2225&2277 7thSt

10/187

Chan, Barney, Env. Health

From: Jeff Rubin [jrubin@portoakland.com]
Sent: Tuesday, May 20, 2003 10:55 AM
To: BChan@co.alameda.ca.us
Cc: Rdb@rb2.swrcb.ca.gov
Subject: Re: HHRA for Oakland Field Support Services Complex, 2225&2277 7th St., Oakland

Barney:
This e-mail message regarding the HHRA is for clarification.....

The final HHRA text and table package was not provided to Roger for review, because during the April 15th meeting we agreed that the only changes needed to finalize the HHRA were to update the tables and terminology to reflect the agreed upon loamy sand soil type. The most recent version of the HHRA draft already included Roger's suggested edits and clarifications. No changes have been made to that draft other than updating the modeling and risk tables and the soil classification.

Roger:
If you would like a copy of the final HHRA now for additional review, please let me know and I will have Iris provide you a copy.

Hopefully this clarification will facilitate Roger's concurrence that all of his points have been addressed and the document can be approved.

Thanks,
Jeff.

Jeff Rubin, CPSS, REA
Port Associate Environmental Scientist
Port of Oakland
Environmental Health and Safety Compliance
530 Water Street
Oakland, CA 94607

(510) 627-1134 direct
(510) 451-5916 fax
jrubin@portoakland.com

PORT OF OAKLAND

May 12, 2003

Mr. Barney Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA 94502

RE: 1st Quarter 2003, Quarterly Groundwater Monitoring and Product Recovery Report – 2277 Seventh Street, Oakland, CA

Dear Mr. Chan:

Please find enclosed the subject Port of Oakland (Port) groundwater monitoring and product recovery report for 2277 Seventh Street in Oakland, California. This report is being submitted in accordance with Alameda County Health Care Services Agency (ACHCSA) requirements.

The next monitoring event will be performed during the second quarter of 2003, and will be in accordance with the aforementioned requirements. If you have any questions or comments regarding the results, please contact me at (510) 627-1134.

Sincerely,

Jeffrey L. Rubin, CPSS, REA
Port Associate Environmental Scientist
Environmental Health and Safety Compliance

Enclosure: noted

Cc (w encl.): Michele Heffes

Cc (w/o encl.): Jeff Jones
Rogerio Leong (Innovative Technical Solutions, Inc.)
Rachel B. Hess (Innovative Technical Solutions, Inc.)
Jeffrey D. Hess (Innovative Technical Solutions, Inc.)

PORT OF OAKLAND

May 7, 2003

2225 7th St
187

Mr. Barney Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

RE: Documentation for Temporary Shutdown of Free Product Removal System and Abandonment of Associated Conveyance Piping - 2277 Seventh Street, Oakland, California

RP 10

Dear Mr. Chan:

This letter documents temporary shut down of the free-product removal system at 2277 Seventh Street to facilitate redevelopment of the site, and abandonment of the conveyance piping between monitoring well MW #3 and the extraction system adjacent to C401 (existing warehouse portion). The enclosed figure illustrates the section of conveyance piping that was removed on April 16, 2003.

As previously mentioned in our March 11, 2003 letter to you, the Port of Oakland (Port) is currently designing a final product removal system for the site that will likely include well MW-3 and additional new extraction wells. We anticipate that the new system will be installed and operating within six to nine months. Shutting down the current free-product removal system for six to nine months is not likely to exacerbate the groundwater quality at the site.

Preparation for construction of the future Port Field Support Services Complex is complete. Ground breaking for building construction is planned for next week. During construction, all of the existing monitoring wells will be protected. Ultimately each wellhead will be completed at the final site grade.

If you have any questions, please call me at (510) 627-1134.

Sincerely,

Jeffrey L. Rubin, CPSS, REA
Port Associate Environmental Scientist
Environmental Health and Safety Compliance

Enclosure: ITSI Documentation – Product Recovery Abandonment

Cc: Mikhail Korsunsky (Port Engineering Dept.)
Rachel Hess (Innovative Technical Solutions, Inc.)
Chris Alger (Iris Environmental)
Jeff Ludlow (Treadwell and Rollo)
Jeff Jones (Port Environmental Health & Safety Dept.)
Roberta Schoenholz (Port Environmental Health & Safety Dept.)

Chan, Barney, Env. Health

From: Jeff Rubin [jrubin@portoakland.com]
Sent: Tuesday, April 29, 2003 9:57 AM
To: BChan@co.alameda.ca.us; Rdb@rb2.swrcb.ca.gov
Cc: calger@irisenv.com; rbalas@irisenv.com; Jeff Jones; gmleong@treadwellrollo.com; jfludlow@treadwellrollo.com
Subject: Final HHRA for Port Facilities Complex, Oakland

Welcome back Barney,

Based on our April 15 meeting with Roger Brewer at the RWQCB, it is our understanding that no further additions or clarifications are required to meet Dr. Brewer's approval. The only changes required subsequent to the RWQCB meeting are to update the current (revised) draft HHRA document to reflect the agreed upon use of "loamy sand" as the design soil type for modeling vapor transport in the vadose zone.

Roger.....if this differs from your understanding please let us know.

Based on this understanding, we propose the following workflow:

1. Iris Environmental prepares a final HHRA document and submits one copy to the Port. The final HHRA will be presented in the same format as the previous revised draft; as a set of replacement sections to the bindered original draft.

2. We (the Port) submit the final HHRA to you (ACHCSA), with a cover letter requesting your review and approval.

3. ACHCSA issues a HHRA approval letter to the Port. Iris Environmental then prepares distribution copies of the Final HHRA replacement package, incorporating the approval letter to all designated recipients, with instructions as to what sections to replace in the distributed binders.

We trust this approach is acceptable to you. We plan to proceed this week unless we hear otherwise from you. If you have any questions, please let me know.

Thanks again for assistance,
Jeff.

Jeff Rubin, CPSS, REA
Port Associate Environmental Scientist
Port of Oakland
Environmental Health and Safety Compliance
530 Water Street
Oakland, CA 94607

(510) 627-1134 direct
(510) 451-5916 fax
jrubin@portoakland.com

Innovative Technical Solutions, Inc.

April 22, 2003

Mr. Jeff Rubin
Associate Environmental Scientist
Port of Oakland
530 Water Street
Oakland, California 94607

RE: Product Recovery Line Abandonment
2277 Seventh Street
Oakland, California

Dear Mr. Rubin:

Innovative Technical Solutions, Inc. (ITSI), on behalf of Port Of Oakland (Port), oversaw the partial removal of a conveyance piping system at the 2277 7th Street site on April 16, 2003. The conveyance piping system consists of a 3-inch diameter PVC conduit pipe designed to convey a pneumatic line and a product recovery line connecting the controlling system and associated recovery tank to an air-actuated (active) product skimmer in monitoring well MW-3 (See Figure). The conveyance piping system was partially abandoned due to the upgrades associated with the new Port Field Support Services Complex installations at the site.

Dillard Environmental Services (Dillard) performed the abandonment of a section of the conveyance piping system. Approximately 100-foot long of the section located between MW-3 and the limit of the surface upgrading activities at east of MW-3 was removed. Abandonment activities consisted of an excavator removing all remaining concrete slabs and asphalt along the 100-foot conveyance trench section and exposing the conduit pipe at both ends of the removed section. Surface concrete slabs and asphalt remnants of the trench line were removed and disposed of in a separate onsite stockpile. The PVC conduit pipe and product recovery line was then cut, removed and disposed of in a drum, and transported off-site under Uniform Hazardous Waste Manifest as non-RCRA hazardous solid waste (see Attachment) by Dillard. No petroleum product was observed to be leaking out from the PVC conduit pipe and product recovery line during the entire removal operation. Conduit pipe of the conveyance system remaining in ground were sealed and capped.

ITSI removed the active product skimmer from well MW-3. The skimmer was placed in a plastic bag and stored in the on-site fenced recovery system.

We trust that this provides the information required at this time. If you have any questions, please contact Rogerio Leong at (925) 946-3134.

Yours very truly,

INNOVATIVE TECHNICAL SOLUTIONS, INC.

Rogerio Leong
Project Geologist

Rachel B. Hess
Project Manager

Attachments: Uniform Hazardous Waste Manifest No. 22084383
ITSI Daily Activity Report Form for April 16, 2003
As-Built of Line Removal – Figure 2: 2277 Seventh Street Site Plan

2730 Shadelands Drive, Suite 100
Walnut Creek, CA 94598

(925) 946-3100
fax (925) 256-8998
www.itsi.com

California—Environmental Protection Agency
Approved OMB No. 2050-0039 (Expires 9-30-99)
print or type. Form designed for use on elite (12-pitch) typewriter.

See Instructions on back of page 6

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAL000174807 — Manifest Document No. 843 83 — 2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
PORT OF OAKLAND
530 WATER STREET
OAKLAND, CA 94607

SITE: PORT OF OAKLAND
3 RIVERS TRUCKING
OAKLAND, CA 94607
ATTN: COLLEEN LIANG

4. Generator's Phone (510) 627-1100

A. State Manifest Document Number 22084383

B. State Generator's ID

5. Transporter 1 Company Name: DILLARD ENVIRONMENTAL SVCS
6. US EPA ID Number: CAD982030173

C. State Transporter's ID (Reserved.)

D. Transporter's Phone (925) 634-6850

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Transporter's ID (Reserved.)

F. Transporter's Phone

9. Designated Facility Name and Site Address
ROMIC ENVIRONMENTAL TECHNOLOGIES
2081 BAY ROAD
EAST PALO ALTO, CA 94303

10. US EPA ID Number: CAD009452657

G. State Facility's ID

H. Facility's Phone (650) 324-1638

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. NON RCRA HAZARDOUS WASTE, SOLID, (petroleum contaminated debris), (pf: 348701)	002	DF	00250	P	State 352; EPA/Other NONE
b.					State; EPA/Other
c.					State; EPA/Other
d.					State; EPA/Other

J. Additional Descriptions for Materials Listed Above
11A 235 ... 348701

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
JOB# 479-021 PO# 09-34114

Emergency Contact: DILLARD (925) 634-6850 WEAR PROPER PROTECTIVE EQUIPMENT (PPE)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: JEFFREY L. RUBIN (AGENT ON BEHALF OF PORT OF OAKLAND) — Signature — Month 04 Day 16 Year 03

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: ANGELO RIZ — Signature — Month 04 Day 16 Year 03

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Signature — Month Day Year

DO NOT WRITE BELOW THIS LINE.

8022A (1/99)
(0—22

Yellow: GENERATOR RETAINS

Innovative Technical Solutions, Inc.
2730 Shadelands Drive, Suite 100
Walnut Creek, California 94598
(925) 946-3100 (Tel), (925) 256-8998 (Fax)

PROJECT NAME: Port of Oakland
PROJECT NUMBER: 00-152.2815
SITE LOCATION: 2277 Seventh Street, Oakland, Ca

DAILY ACTIVITY REPORT

DATE: 04/16/03
PAGE 1 OF 1

DESCRIPTION OF FIELD ACTIVITIES AND EVENTS

6:50 Arrive at site
7:00 Meet Melissa with Dillard and other subcontractors onsite.
7:30 Excavator exposes conduit at both ends of the section of line removal (asphalt end and MW-3). Conduit at the asphalt end was found buried at approximately 1-foot from the surface grade and less than 1-foot at the well MW-3 side.
8:30 Cut 3" ∅ conduit and pneumatic + product line at asphalt end side. Disconnect lines in pneumatic + product line from skimmer pump and pull both lines out of the conduit. No product was observed leaking out of lines during cutting and removal. Both ends conduit were capped.
9:00 Excavator breaks off remaining pieces of asphalt + concrete for removal and disposal. Pneumatic line was rolled up and stored in a bag and placed inside fenced system. Product line + conduit PVC pipe was disposed of in a drum and transported offsite by Dillard.
10:30 Pull active skimmer in MW-3, place in a plastic bag and store in the fenced system.
10:45 Monitor for free phase product in MW-3 to measure:
DEPTH TO PRODUCT = 7.27 feet
DEPTH TO WATER = 8.25 feet
PRODUCT THICKNESS = 0.98 feet
11:00 Pull passive skimmer in well MW-1, empty out liquid in skimmer reservoir into a bucket which it was transferred to 1,000 gallon tank. Monitor for free phase product in MW-1 to measure:
DEPTH TO WATER = 8.71 feet
DEPTH TO PRODUCT = 7.42 feet
PRODUCT THICKNESS = 1.29 feet
11:20 Place passive skimmer back in well MW-1
11:30 Measure liquid inside 1,000 gallon tank. It contains approximately 25 gallons of liquid of which approximately 5 gallons are free phase petroleum product
12:00 Leave site

PREPARED BY: Rogelio Leong
DATE: 04/16/03
PREPARER'S SIGNATURE:

Dly Act Rpt.mxd "Reviewed by"

PORT OF OAKLAND

March 11, 2003

Mr. Barney Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

RE: Proposed Temporary Shutdown of Free Product Removal System and Abandonment of Associated Conveyance Piping - 2277 Seventh Street, Oakland, California

Dear Mr. Chan:

The buildings C401 (office portion), C406, and C407 have been demolished in preparation for construction of the future Port of Oakland (Port) Field Support Services Complex at the 2225 and 2277 Seventh Street site. Earthwork and rough surface soil grading are complete and ground breaking for building construction is planned for later this month.

As I mentioned during my voice message to you today, the Port requests that the free-product removal system operating at the 2277 Seventh Street site be temporarily shut down to facilitate redevelopment of the site. In addition, we request that the conveyance piping between monitoring well MW #3 and the extraction system adjacent to C401 (existing warehouse portion) be abandoned. The attached figure illustrates the current site plan.

The reason for this request is that the product conveyance piping will be approximately 4 feet below the final grade of the redeveloped site, when filling and site grading are complete. This buried piping depth will be too deep for the MW-3 wellhead elevation at the new site grade. In addition, the final product recovery system, to be designed and installed later this year may not use the same conveyance piping location. The Port proposes to abandon the conveyance piping by flushing out and collecting any residual product that may be in the piping. Two equivalent volumes of water will be flushed through the conveyance piping and retained in the extraction system holding tank. The piping will then be cut off and capped at the well head and at the extraction system ends of the pipe. The unattached conveyance pipe in between will be removed and appropriately disposed. All of the existing monitoring wells will be maintained and completed with a new well head at the new site grade.

530 Water Street ■ Jack London Square ■ P.O. Box 2064 ■ Oakland, California 94604–2064
Telephone: (510) 627-1100 ■ Facsimile: (510) 627-1826 ■ Web Page: *www.portofoakland.com*

The Port is currently designing a final product removal system for the site that will likely include well MW-3 and additional new extraction wells. We anticipate that the new system will be installed and operating within six to nine months. Shutting down the current free-product removal system for six to nine months is not likely to exacerbate the groundwater quality at the site. Free product has not been effectively removed from the well since fall of 2002, and product has not been observed in the site monitoring wells at a thickness greater than a sheen since that time.

Please contact me to confirm acceptance of the proposed plan. If you have any questions, please call me at (510) 627-1134.

Sincerely,

Jeffrey L. Rubin, CPSS, REA
Port Associate Environmental Scientist
Environmental Health and Safety Compliance

Alameda County
MAR 13 2003
Environmental Health

Encl.: noted

Cc: Mikhail Korsunsky (Port Engineering Dept.)
Rachel Hess (Innovative Technical Solutions, Inc.)
Chris Alger (Iris Environmental)
Jeff Ludlow (Treadwell and Rollo)
Jeff Jones (Port Environmental Health & Safety Dept.)
Roberta Schoenholz (Port Environmental Health & Safety Dept.)

PORT OF OAKLAND

Alameda County
FEB 13 2003
Environmental Health

February 7, 2003

Mr. Barney Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 94502

Ro 10/187

Re: **Soil Gas Mitigation System Plan and Specifications for Gas Vapor Barrier System - Future Port of Oakland Field Support Services Complex - 2225 and 2277 Seventh Street, Oakland, California**

Dear Mr. Chan:

As you requested during our phone conversation on February 4, 2003, please find enclosed the subject Port of Oakland (Port) plans and specifications for the respective Soil Gas Mitigation and Vapor Barrier Systems for the future Port Field Support Services Complex (PFSSC) - 2225 and 2277 Seventh Street in Oakland, California. Both of these mitigation measures have been incorporated into the design of the new building. This information is being submitted in accordance with Alameda County Health Care Services Agency (ACHCSA) requirements.

As we discussed during our phone call, the Port's consultants are currently preparing responses to the comments provided by Roger Brewer of the Regional Water Quality Control Board (RWQCB) regarding the PFSSC Human Health Risk Assessment (HHRA). Our consultants will also address the main points that were outlined by Mr. Brewer during our meeting on January 27 at the RWQCB office.

We plan to issue an addendum or supplement to the HHRA that will respond to RWQCB comments, combined with those presented during the meeting. Tentatively, this addendum will be complete and issued during the week of February 17.

After you and Mr. Brewer have reviewed the addendum, we would appreciate your concurrence to proceed with our redevelopment plans. If you have any questions, please contact me at (510) 627-1134.

Sincerely,

Jeffrey L. Rubin, CPSS, REA
Associate Port Environmental Scientist
Environmental Health and Safety Compliance

Enclosure: noted

Cc (w encl.): Michele Heffes
Roger Brewer, Regional Water Quality Control Board
Rachel Hess, Innovative Technical Solutions, Inc.

Cc (w/o encl.): Jeff Jones
Roberta Schoenholz

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(10)

Chan, Barney, Env. Health

From: Roger Brewer [Rdb@rb2.swrcb.ca.gov]
Sent: Tuesday, January 28, 2003 10:31 AM
Cc: BChan@co.alameda.ca.us; calger@irisenv.com; rbalas@irisenv.com; jrubin@portoakland.com; gmleong@treadwellrollo.com; jfludlow@treadwellrollo.com
Subject: RE: Meeting on HHRA for future Port FSSC, 2225 and 2277 7th St.,Oakland


Windows bitmap

Barney,
Sorry you couldn't make the meeting yesterday. Below are a few main points that were discussed. Attached also is the "Flaming Pit" photo I mentioned, from a former gasoline station site I once worked on. No free product was present (sheen only). Vapors in the sandy soil would ignite whenever the backhoe bucket dug into the excavation!

1. [redacted] It was generally agreed that the high levels of methane and other gases in the subsurface could pose potential health and explosive hazard concerns should a new building be constructed on the site. The proposed vapor mitigation system looks adequate to address these issues for the building. Jeff - We would like ~~to~~ copies of the proposed design if possible, to use as an example in other cases.

2. [redacted] We discussed the inclusion of TPH in the evaluation of potential health and explosion hazard concerns, using toxicity values from Massachusetts and the TPH Working Group publications. See also Appendix 1, Section 5 of our RBSL document and the December 24, 2002, memo we prepared on soil gas screening levels. This will just help highlight potential concerns already discussed in the risk assessment.

3. [redacted] A review of background metals concentrations in soil will be carried out using both median data (or 95% UCL on the mean, as we have been using) and Upper Threshold Concentrations (UTL). The first relates to the typical "average" concentration of a metal in soil. The second relates to the statistical maximum concentration of a metal that may be present in soil.

If concentrations of a metal are below the median/95% UCL on the mean, then the metal can reasonably be assumed to be present as natural background no further action is warranted. If concentrations of a metal are above the UTL, then this is most likely related to contamination and the need for remedial action needs to be reviewed (e.g., quick screen using RBSLs). If concentrations are between average background and the statistical maximum background then a closer look at background vs potential contamination needs to be carried out and the need for remedial actions evaluated.

4. [redacted] Although the proposed vapor mitigation system proposed for the new building should be effective, the need for more aggressive remediation of impacted groundwater should be further discussed. Under current conditions, elevated levels of methane, TPH and other hazardous vapors will continue to pose hazards to workers involved in excavation and utility maintenance activities in the area. Lateral migration of vapors could pose risks to adjacent sites. Vapor conditions will need to be continually monitored in the proposed building and any new buildings constructed on the site in the future.

Additional removal of free product will help mitigate additional

generation of hazardous vapors. Heavy contamination in the capillary smear zone and groundwater will continue to serve as a source of future vapors, however, as discussed in the meeting. Potential actions to reduce the future generation of vapors should at least be evaluated. It may be useful to set a goal when subsurface vapors will be reduced to acceptable levels (e.g., reduce subsurface vapors below potential explosive levels and potential indoor-air concerns within ~~in~~ ten years).

5. RWB Comments. [redacted]
December [redacted]

Roger D. Brewer
San Francisco Bay RWQCB
1515 Clay Street, Suite 1400
Oakland, CA 94612

tel: 1-510-622-2374
fax: 1-510-622.2460
rdb@rb2.swrcb.ca.gov

(10)

Chan, Barney, Env. Health

From: Chan, Barney, Env. Health

Sent: Wednesday, January 22, 2003 1:41 PM

To: Jeff Rubin (E-mail); Roger Brewer (E-mail)

Subject: meeting on HHRA for future Port FSSC, 2225 and 2277 7th St., Oakland

Gentlemen:
I understand that a meeting or teleconference is requested among the Port, Port consultant and the Water Board to discuss questions regarding the October 2002 Human Health Risk Assessment for the referenced sites. Our office concurs with this meeting. Please notify me when the meeting or teleconference will be scheduled as I would like to observe or attend for informational purposes.

Thank you

Barney M. Chan
Hazardous Materials Specialist
Alameda County Environmental Health
510-567-6765

PORT OF OAKLAND

December 20, 2002

Mr. Barney Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

RE: Monitoring Well Abandonment to Facilitate Construction of Port of Oakland (Port) Field Support Services Complex - 2225 and 2277 Seventh Street, Oakland, California

Dear Mr. Chan:

Demolition of buildings C401 (partially), C406, and C407 is nearly complete in preparation for construction of the future Port Field Support Services Complex (PFSSC) at the 2225 and 2277 Seventh Street site. Demolition earthwork and surface soil grading are ongoing.

Construction activities for the new PFSSC could begin as early as January 2003. Several monitoring wells would interfere with this construction, including MW-1 and MW-2 at 2225 Seventh Street and MW-6 and MW-7 at 2277 Seventh Street. As discussed during a phone conversation with you on December 17, we scheduled these wells to be abandoned. As a result, I requested that our consultant, Innovative Technical Solutions, Inc. (ITSI) obtain a permit from Alameda County. Upon receipt of the permit, the wells were appropriately abandoned on December 18, 2002.

As previously described in our letter to you dated November 19, 2002, monitoring well MW-3 located at 2225 Seventh Street was damaged during grading activities. We instructed ITSI to appropriately abandon the well. ITSI obtained a permit from Alameda County and abandoned the well on November 21, 2002. Coincidently, this monitoring well would have been included with the abandonment of monitoring wells described above. The enclosed Figures 1 and 2 show site conditions before and after well abandonment, respectively.

The ITSI report entitled "Additional Characterization and Remedial Action Plan for 2225 and 2277 Seventh Street" (RAP) describes the impact of proposed site redevelopment on exiting monitoring wells. This report was submitted to you on May 30, 2002 in accordance with Alameda County Health Care Services Agency requirements. The report indicates that removal of the current monitoring well system may be necessary to accommodate the redevelopment effort.

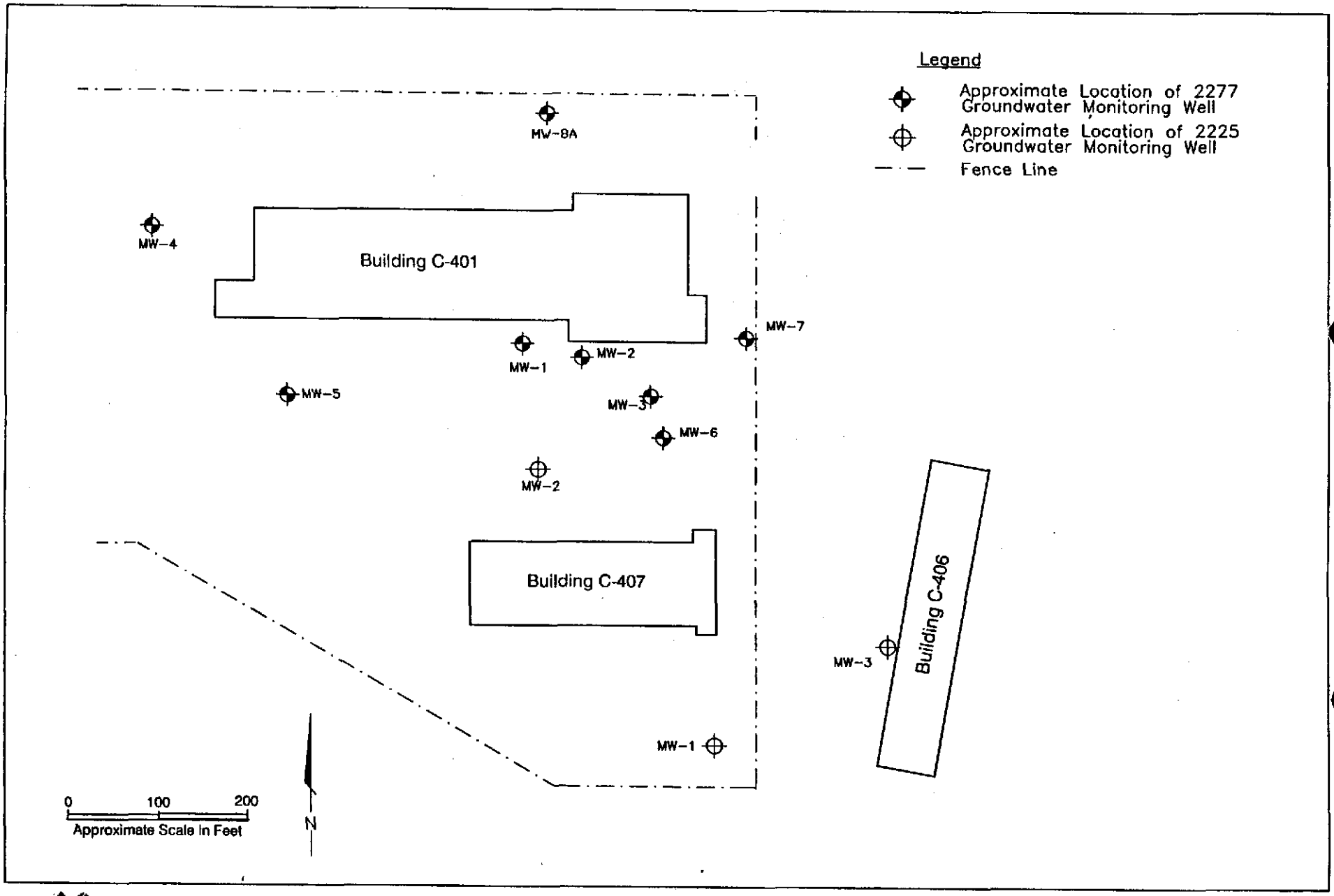
Replacement monitoring wells for all abandoned wells will be installed and incorporated into the monitoring well network for the site, during implementation of the proposed RAP that expands the free product recovery system. If you have any questions, please contact me at (510) 627-1134.

Sincerely,

Jeffrey L. Rubin, CPSS, REA
Associate Port Environmental Scientist
Environmental Health and Safety Compliance

Attachments: Figures 1 and 2 (noted)

Cc: Michele Heffes
Mikhail Korsunsky
Barry MacDonnell
Joe Trapp
Derrick Cooper
Jeff Jones
Roberta Schoenholz
Rachel Hess (ITSI)



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A MACTEC COMPANY

FORMER SITE PLAN
2277 and 2225 Seventh Street
Oakland, California 95607

FIGURE
1

DRAWN	JOB NUMBER	APPROVED	DATE	REVISED DATE
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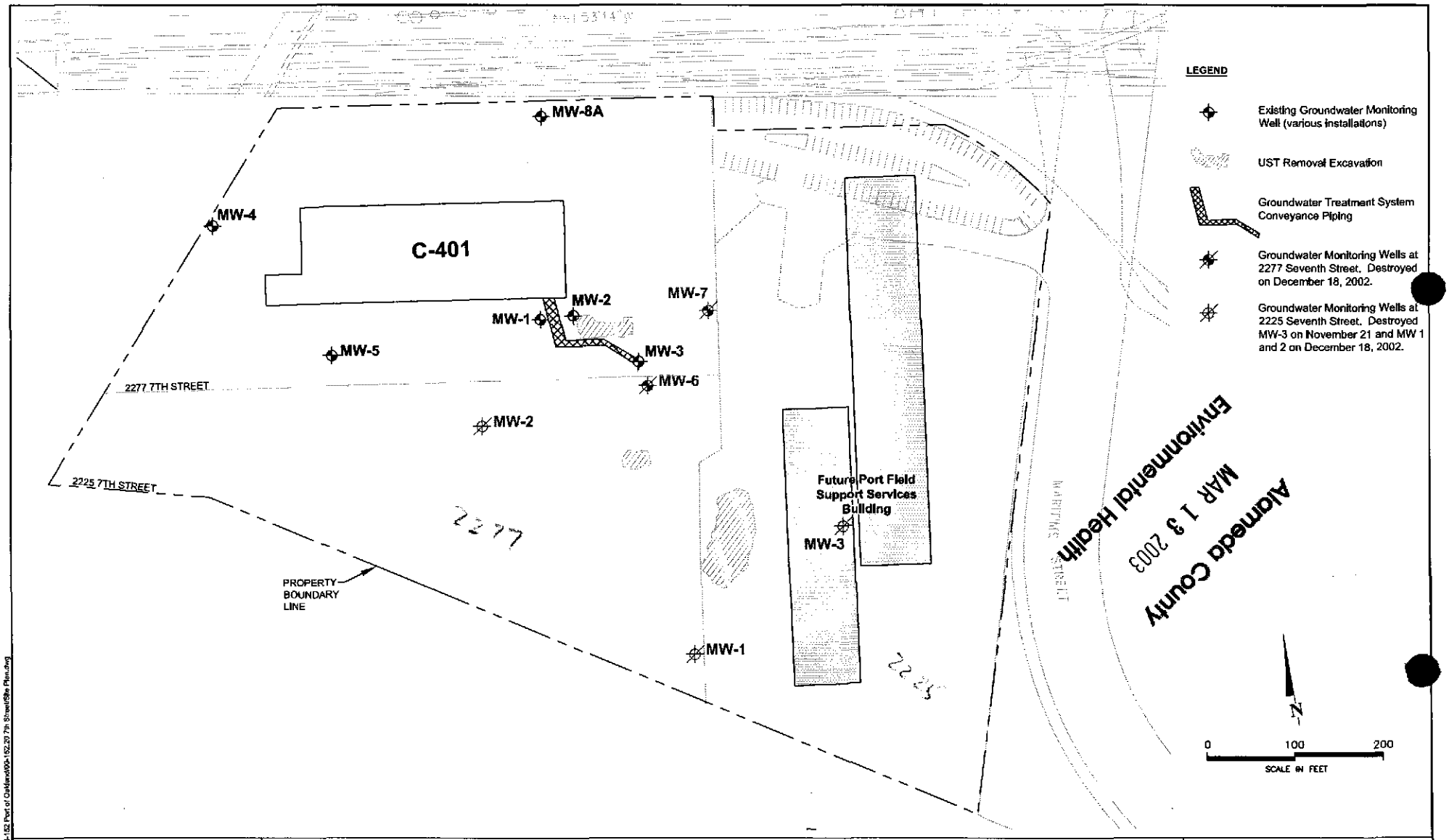
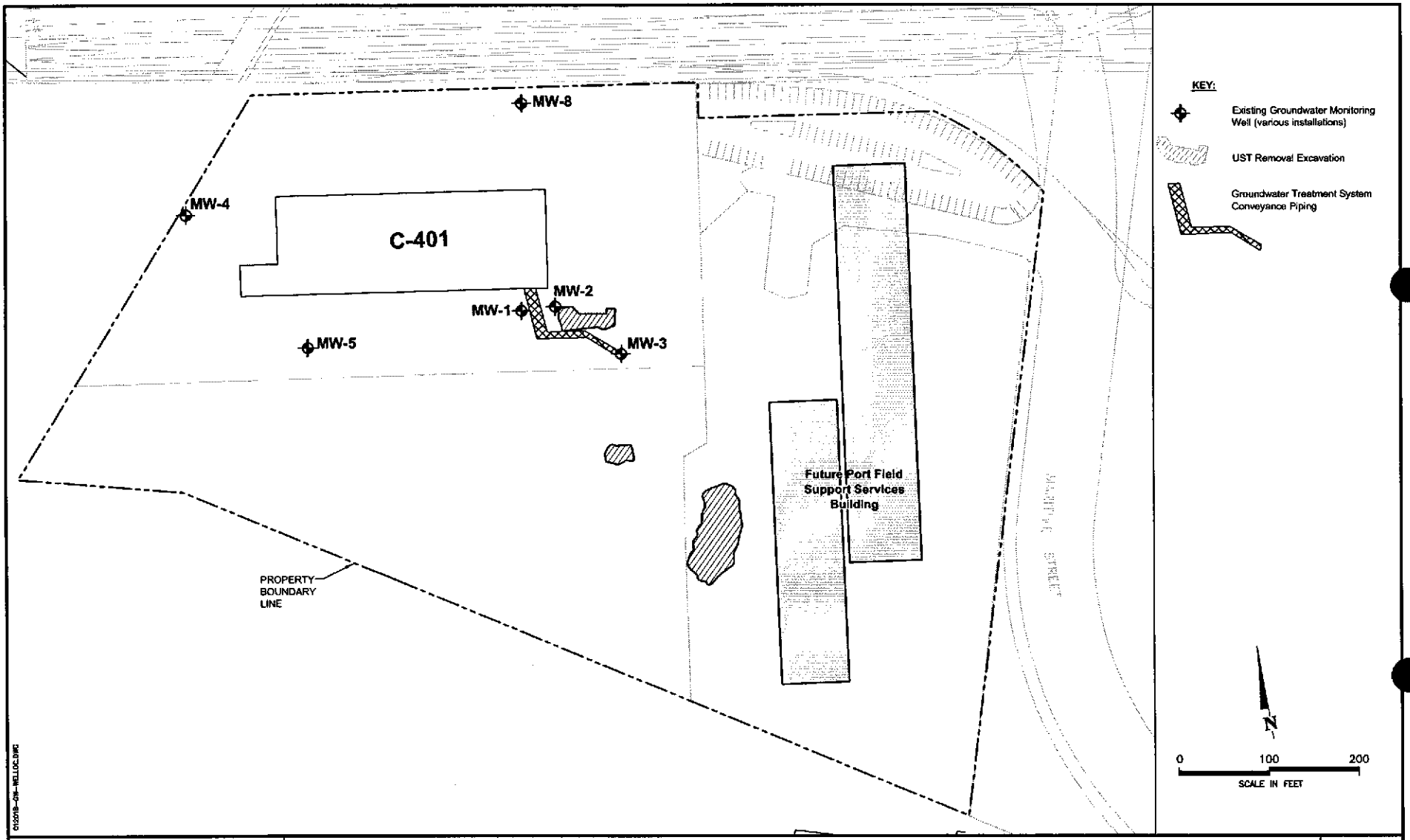


ITSI Innovative Technical Solutions, Inc.

Fourth Quarter 2002, Quarterly Groundwater Monitoring and Product Recovery
Semi-Annual 2002 Groundwater Monitoring
2225 and 2277 Seventh Street
Oakland, California

Figure 2
Site Plan

CAD GIS Station900-152 Port of Oakland\900-152.20 7th Street\Site Plan.dwg



IRIS ENVIRONMENTAL
1515 Broadway, Suite 1003, Oakland, California 94612

Existing Ground Water Monitoring Wells and Treatment System (to be protected)
Port of Oakland Future Port Field Support Services Complex
2225 and 2277 7th Street
Oakland, California

Figure
2

Drafter: MAS | Date: 12/11/02 | Contract Number: 01-201B | Approved: | Revised:

California Regional Water Quality Control Board
San Francisco Bay Regional Water Quality Control Board

Winston H. Hickox
Secretary for Environmental Protection

Internet Address: http://www.swrcb.ca.gov
1515 Clay Street, Suite 1400, Oakland, California 94612
Phone (510) 622-2300 • FAX (510) 622-2460

Gray Davis
Governor

Alameda County
DEC 20 2002
Environmental Health

TO: Barney Chan
Alameda County Health Services

FROM: Roger Brewer RB
SF Bay Regional Water Quality Control Board
Toxics Cleanup Division

DATE: December 18, 2002

SUBJECT: Review of *Human Health Risk Assessment* for Future Port of Oakland Field Support Services Complex, 2225 and 2277 Seventh St., Oakland, CA

I reviewed the October 2002, *Human Health Risk Assessment* for the future Field Support Services Complex at 2225 and 2277 Seventh St. in Oakland. The risk assessment evaluates potential risks to construction workers during redevelopment of the property as well as to future workers on the property. Below are specific comments.

To summarize, the risk assessment concludes that wind dispersion of methane and other flammable gases during construction and trenching activities will be rapidly decreased to below explosive limits by wind dispersion and therefore significant risks to workers are unlikely. While this may be true in some cases, concentrations of explosive gases in excavations during initial trenching or during periods of stagnant wind could easily exceed explosive limits. Appropriate health and safety measures should therefore be taken. OSHA regulations require that all work be stopped when the cumulative concentration of gases reach 20% of the Lower Explosive Level (LEL).

The risk assessment also concludes that impacts at the site pose potentially unacceptable, long-term risks ($>1x10^{-5}$ risk) to workers in future buildings in the absence of unspecified "passive vapor venting systems" beneath the foundations of the buildings. While I concur with this conclusion, though not necessarily the calculated risks (see below), additional review of proposed "vapor venting system" needs to be carried out and methods to ensure that the measures are adequate in the future need to be presented in a formal Risk Management Plan (e.g., periodic soil gas and indoor-air monitoring). In addition, the models predict that TPH levels in indoor air after use of the vapor venting system may exceed screening levels for both human health and nuisance concerns.

Note that a similar risk assessment was submitted to our office for the former Mobil Terminal Facility at 909 Ferry Street in Oakland (October, 2002, *Revised Human Health Risk Assessment and Methane Evaluation* and *Ecological Risk Issues*). A copy of key sections of that document is attached. High levels of methane in soil gas are also present beneath a large area of this site. As stated in the risk assessment, and concurred with by our office, "The remediation of methane (and other flammable gases)... present beneath the site asphalt cover is required to reduce acute (i.e., explosive)... risks and to ensure the safety of site workers and future site occupants (during and following proposed redevelopment)." I recommend that actions proposed in the 909 Ferry Street site risk assessment to address potential acute explosive hazards and long-term risks also be applied to the 2225 and 2277 Seventh St. site. This includes targeted remediation of soil and groundwater impacts to reduce levels of volatile chemicals in soil gas to ten-percent or less of their Lower Explosive Level.

Specific Comments:

Post-it® Fax Note 7671	Date 12/26/02	# of pages ▶ 3
To J. Rubin	From B Chan	
Co./Dept. PORT	Co. ACEH	
Phone # 451-5916	Phone # 510-567-6765	
Fax # ~~627-1826~~	Fax #	

1. **Section 3.3. Exposure pathways. Include potential dermal exposure and inhalation of volatiles and particulates as exposure pathways for commercial/office workers.** The exclusion of dermal contact and inhalation of particulates but inclusion of soil ingestion as potential exposure pathways for commercial workers is not compatible. The full range of potential exposure pathways should be initially evaluated. If target risks are exceeded under this scenario then remedial actions and/or risk management practices (e.g., maintaining a protective cap) should be recommended.

2. **Section 3.4. Exposure assumptions - Justify use of two-day exposure frequency assumed for future intrusive workers.** While this assumption may be valid, it should be based on discussions with the Port maintenance office.

3. **Section 4.0. Background Metals - Use mean background concentrations of metals in soil to evaluate potential human-caused impacts.** As discussed in Volume 1, Section 2.8 of our office's Risk-Based Screening Levels document (RBSLs, December 2001), the "background" concentrations of metals in soils presented in the 1995 Lawrence Berkeley Laboratory (LBL) are not adequate as stand-alone screening levels. The LBL document presents Upper Threshold Levels, or statistical maximum concentrations of metals in soils at the LBL facility. Statistical average, versus maximum, concentrations of metals in soil should be used to screen for background versus potential human-caused impacts. The LBL document is currently being revised and will reportedly include statistical mean concentrations of metals in soils in the LBL property. If so, these values should be used for initial screening purposes. Refer to Figure 4 of our RBSL document for specific information on the evaluation of arsenic in soils.

4. **Section 4.0. Chemicals of Potential Concern - Include evaluation of methylnaphthalene and Total Petroleum Hydrocarbons (TPH) for soil and groundwater impacts; address potential nuisance concerns.** Methylnaphthalene can be a significant component of diesel fuel and is highly toxic to aquatic organisms, should the plume migrate offsite and impact surface water. An evaluation of TPH must always be included with the evaluation of target indicator compounds such as PAHs. Refer to Appendix 1, Chapter 4 of the RWQCB Risk-Based Screening Levels document (December 2001) for additional information. Screening levels for methylnaphthalene and TPH are presented in our offices RBSL document. For indoor air, the reference doses for TPH-gasolines and TPH-middle distillates (e.g., diesel) presented in Appendix 1, Table J of that document can be used to evaluate potential noncarcinogenic risks, based on modeled impacts to indoor air.

   The model results presented in the report (Table 5-4) predict concentrations of TPH-diesel in indoor-air in the range of 250 mg/m^3 (assuming presence of vapor venting system) to 1,800 mg/m^3 (not assuming presence of vapor venting system). Based on my calculations, the health-based indoor-air screening level for TPH in general is approximately 32 ug/m^3. The predicted levels also exceed the odor recognition threshold for TPH in ambient air (in the range of 0.5 mg/m^3 to 7.0 mg/m^3, based on ATSDR profiles), suggesting that impacts may also cause nuisance concerns.

5. **Section 5.1. Exposure point concentrations. Do not include sample data outside of areas of impact in the calculation of exposure point concentrations (i.e., "non-detect" data).** In accordance with CalEPA risk assessment guidance, sample data outside of impacted areas should not be included in the calculation of exposure point concentrations. Refer to Section 2.2 of our offices RBSL document.

6. **Sections 6.6, 7.4, Appendix B. Explosive Hazards. Refer to the conclusions and recommendations in the risk assessment prepared for the 909 Ferry Street in Oakland (October, 2002, *Revised Human Health Risk Assessment and Methane Evaluation* and *Ecological Risk Issues*).** See above discussion and attached sections of that document. The combined concentrations of flammable gasses should be used to evaluate potential explosive hazards (e.g., methane + TPH-gasoline + TPH-diesel + other flammable gasses).

7. **Appendix B, Sections B-3 and B-5. Dust Model - Use the assumed air-born particulate concentration of 500 ug/m3 presented in Section B-3 for an intrusive/construction exposure scenario.** Assumptions for air-born particulate concentrations presented in Section B-5 are not appropriate for construction workers and appear to conflict with more valid assumptions presented in Section B-3. It is unclear how Section B-5 was incorporated into the results of the risk assessment. For commercial/industrial workers, utilize a Particulate Emission Factor in the risk assessment rather than an assumed percent of the OSHA standard. Refer to Appendix 2 of our offices RBSL document.

8. **Appendix B. J&E Model Assumptions. Assume a default water-filled porosity of 0.15 and sandy soils under future buildings; assume the presence of a 0.1 cm-wide crack for every 10m length of floor space; provide printouts of models.** The assumed water-filled porosity of 0.34 for sand soils (and sand loams) is not adequately conservative and could cause potential impacts to indoor-air to be significantly under predicted. A default water-filled porosity of 0.15 should be used in the absence of site-specific data for soils under buildings. The default wall/floor crack width of 0.1 cm presented in the J&E guidance document referenced in the risk assessment is intended for small buildings (10m x 10m) and may not be adequately conservative for large structures as assumed in the models (230m x 21m). By my calculations, assuming the presence of a 0.1 cm-wide crack every 10m of floor length yields a cumulative crack area of approximately 9700 cm^2. This is roughly double the total crack area assumed in the model. Doubling the assumed model crack width is one way to address this issue (i.e., use 0.2 cm). Refer also to Appendix 1, Section 2.3 of our offices RBSL document.

9. **Section 7.0, Appendix B. Provide details of the proposed "passive vapor venting system."** The assessment suggests that unspecified "passive vapor venting systems" will be adequate to negate potential indoor air concerns but no details of this system or examples where it has been sucessfully used in the past are provided. Long-term monitoring of subslab soil gas and indoor-air impacts should be required in the absence of adequate remediation.

10. **Section 7.3. Evaluate potential odor concerns from petroleum vapors infiltrating new buildings.** The models predict concentrations of TPH-diesel in indoor air between 250 mg/m^3 (with vapor venting system) and 1,800 mg/m^3 (without vapor venting system).

11. **General. Determine the extent of chemicals in soil gas to at least 10% of the LELs for each chemical.** A concentration of 10% of a chemicals LEL should be used to delineate areas where levels of flammable gases in the vadose zone may pose potential explosive hazards. Based on the data presented, this has not been adequately investigated in the south part of the site.

12. **General. Prepare a Risk Management Plan to address residual impacts and potential future concerns to workers.**

Chan, Barney, Env. Health

To: Roger Brewer (E-mail)

Subject: HHRA for 2225 & 2277 7th St., Oakland 94607

Roger: I think my initial e mail to you was unclear. The HHRA binder I sent you was done on behalf of the Port of Oakland. They are planning to build a Port Field Services Complex (PFSC). The risk assessment evaluates risk to the workers during construction and the risk to commercial workers who would work at the building. It is not a request for site closure. They would like your concurrence with their conclusion that no unacceptable risk exists for the construction workers or the future commercial occupants of the proposed building. The Port will continue free product removal which exists outside the footprint of the proposed building and the evaluation of other remediation techniques. Jeff Rubin of the Port intends to call you upon your return to clarify this further. Call me if you have any questions.
Thanks

Barney M. Chan
Hazardous Materials Specialist
Alameda County Environmental Health
510-567-6765

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PORT OF OAKLAND

November 19, 2002

Mr. Barney Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

RE: Damage to Monitoring Well MW-3 and Proposed Well Abandonment
2225 Seventh Street, Oakland, California

Dear Mr. Chan:

The buildings C401 (partially), C406, and C407 are currently being demolished in preparation for construction of the future Port of Oakland (Port) Field Support Services Complex at the 2225 and 2277 Seventh Street site. Earthwork and surface soil grading are underway.

Before the demolition work began, all existing monitoring and extraction wells were clearly marked and protected. Although these well protection measures were in place, monitoring well MW-3 located at 2225 Seventh Street was damaged during grading activities on November 15. I visited and inspected the monitoring well yesterday, along with Rachel Hess, our Consultant from Innovative Technical Solutions, Inc. (ITSI). The damage is irreparable. As a result, I have requested that ITSI obtain a permit from Alameda County and appropriately abandon the well as soon as possible.

A replacement monitoring well will be installed and incorporated into the monitoring well network for the site, during implementation of the proposed Remedial Action Plan (RAP). The RAP was prepared by ITSI and submitted to you on May 30, 2002.

If you have any questions, please contact me at (510) 627-1134.

Sincerely,

Jeffrey L. Rubin, CPSS, REA
Associate Port Environmental Scientist
Environmental Health and Safety Compliance

Cc: Michele Heffes
Mikhail Korsunsky
Barry MacDonnell
Joe Trapp
Derrick Cooper
Jeff Jones
Roberta Schoenholz
Rachel Hess (ITSI)

PORT OF OAKLAND

MAR 27 2002

March 25, 2002

Barney Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 94502

Re: Additional Preliminary Site Characterization Results
2225 and 2277 Seventh Street, Port of Oakland,
Oakland, California

Dear Mr. Chan,

The attached preliminary total and organic lead results from recent site characterization activities performed by Innovative Technical Solutions, Inc. (ITSI) supplement data previously submitted to you on March 19, 2002. These enclosed results are being provided as further follow up to the telephone discussion with you on March 8, 2002, and to address Alameda County Health Care Services Agency (County) requirements regarding the 2225 and 2277 Seventh Street sites (the Sites) in Oakland. ITSI performed this investigation on behalf of the Port of Oakland (Port) in accordance with the County-approved Workplan for Additional Site Characterization dated November 8, 2001.

These preliminary lead results were not submitted to you with the previous March 19 data because the analytical laboratory had not completed organic lead analyses on the product samples.

We understand that you need these preliminary results to evaluate the upcoming investigation by Iris Environmental (Iris) that will support the design of the future Facilities Support Services Center (FFSSC). If you have any questions concerning these preliminary data, please contact me at (510) 627-1134.

Sincerely,

Jeffrey L. Rubin, CPSS, REA
Associate Port Environmental Scientist

cc: Chris Alger, Iris Environmental
Rachel Hess, ITSI

PORT OF OAKLAND

March 19, 2002

Barney Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 94502

Re: Preliminary Site Characterization Results
2225 and 2277 Seventh Street, Port of Oakland,
Oakland, California

Dear Mr. Chan,

As a follow up to our telephone discussion with you on March 8, 2002, and to address Alameda County Health Care Services Agency (County) requirements regarding the 2225 and 2277 Seventh Street sites (the Sites) in Oakland, we are transmitting preliminary results from recent site characterization activities performed by Innovative Technical Solutions, Inc. (ITSI). ITSI performed this investigation on behalf of the Port of Oakland (Port) in accordance with the County-approved Workplan for Additional Site Characterization dated November 8, 2001.

We understand that you need these preliminary results to evaluate the upcoming investigation by Iris Environmental (Iris) that will support the design of the future Facilities Support Services Center (FFSSC).

If we do not hear from you during the week, we will assume that the County concurs with the investigation approach. If you have any questions concerning these preliminary data, please contact me at (510) 627-1134.

Sincerely,

Jeffrey L. Rubin, CPSS, REA
Associate Port Environmental Scientist

cc: Chris Alger, Iris Environmental
Rachel Hess, ITSI

Table 1 (Continued)

Analytical Results for Groundwater Samples
2225 and 2277 Seventh Street, Oakland

		Groundwater Results (in µg/L)							
Sample ID	Date	Gasoline[1]	Diesel[2]	Motor Oil[2]	Benzene	Toluene	Ethylbenzene	Xylene(s)	MTBE
PZ-A	2/19/02	65	700	< 500	< 0.50	< 0.50	< 0.50	< 0.50	< 5.0
DUP-A	2/19/02	700	1200	< 500	70	< 0.50	3.7	8.8	< 5.0
PZ-B	2/19/02	< 50	570	670	< 0.50	< 0.50	< 0.50	< 0.50	< 5.0
PZ-C	2/19/02	510	2200	< 500	73	< 0.50	2.5	7.3	< 5.0
PZ-D	2/19/02	760	2500	< 500	49	2.6	21	12	< 5.0
PZ-E	2/19/02	2,000	4400	< 500	380	< 2.5	11	5.2	< 25
PZ-F	2/19/02	1,000	10000	< 10000	20	< 5.0	9.4	10	< 50
Trip Blank	2/19/02	< 50	NA	NA	< 0.50	< 0.50	< 0.50	< 0.50	< 5.0
Historical Data									
MW-8A	10/5/01	370	760	< 280	< 1.2	< 1.2	< 1.2	< 1.2	< 6.2
Trip Blank	10/5/01	< 50	NA	NA	< 0.50	< 0.50	< 0.50	< 0.50	< 2.5

µg/L: micrograms per liter

1-Gasoline was analyzed using EPA Method 8015B (purgeables)
2- Diesel and motor oil were analyzed using EPA Method 8015B with silica gel cleanup

DRAFT

Table 2

Results of Product Analysis (by Friedman and Bruya, Inc.)
2225 and 2277 7th Street, Oakland

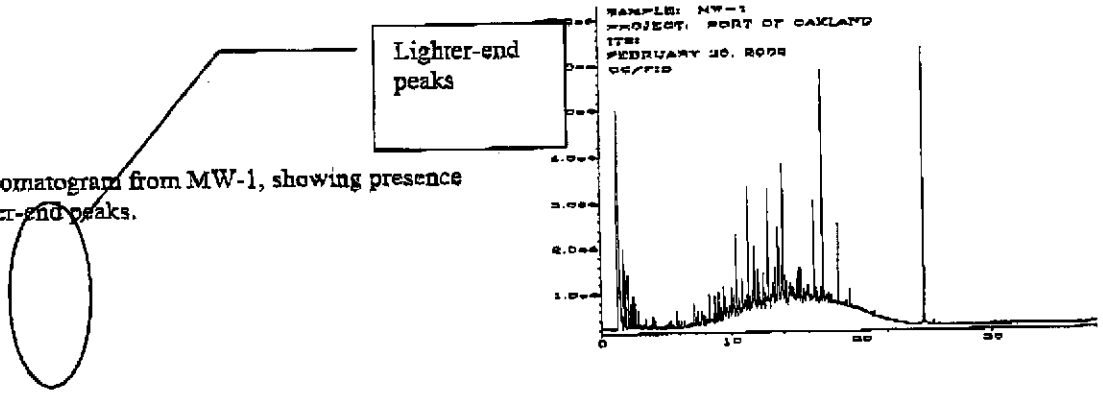
Sample ID	Primary Findings	Other Findings
MW-1 (2277 7th Street)	Medium boiling, C_9 to C_{24} Fuel present has undergone substantial biological degradation	710 µg/g (ppm) Benzene 280 µg/g Ethylbenzene
MW-3 (2277 7th Street)	Medium boiling, C_9 to C_{24} Fuel present has undergone substantial biological degradation	
PZ-F (CPT-14)	Medium boiling, C_9 to C_{24} Fuel present has undergone substantial biological degradation	
CPT-14	Medium boiling, C_9 to C_{24} Fuel present has undergone substantial biological degradation	
CPT-19	Medium boiling, C_9 to C_{24} Majority of fuel present has NOT undergone substantial biological degradation	180 µg/g Ethylbenzene 150 µg/g Xylenes
CPT-20	Medium boiling, C_9 to C_{24} Majority of the fuel present has undergone substantial biological degradation	140 µg/g Ethylbenzene 710 µg/g Xylenes
CPT-30	Medium boiling, C_9 to C_{24} A mixture of degraded and relatively undegraded fuel is likely present	170 µg/g Ethylbenzene 280 µg/g Xylenes
Wash Rack Sump (CJRS)	Medium-high boiling, C_{13} to C_{34}	

µg/g: micrograms per gram ppm: parts per million

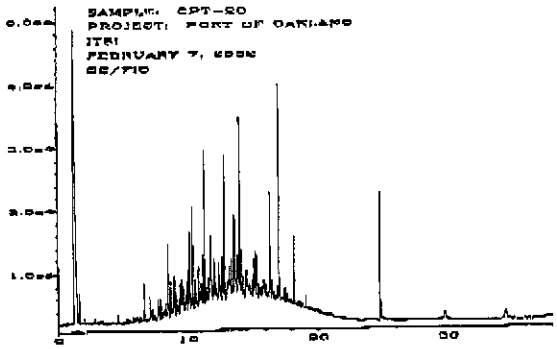
DRAFT

Table 3

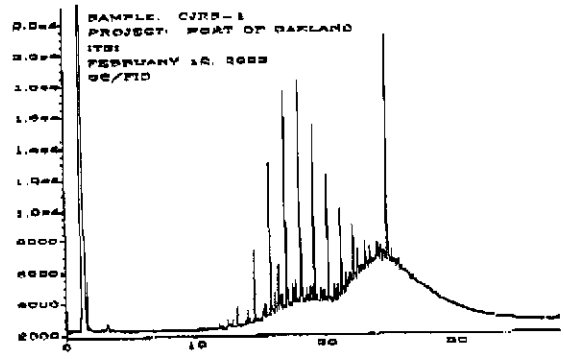
Chromatograms from Product Samples 2225 and 2277 7th Street, Oakland



FID chromatogram from MW-1, showing presence of lighter-end peaks.

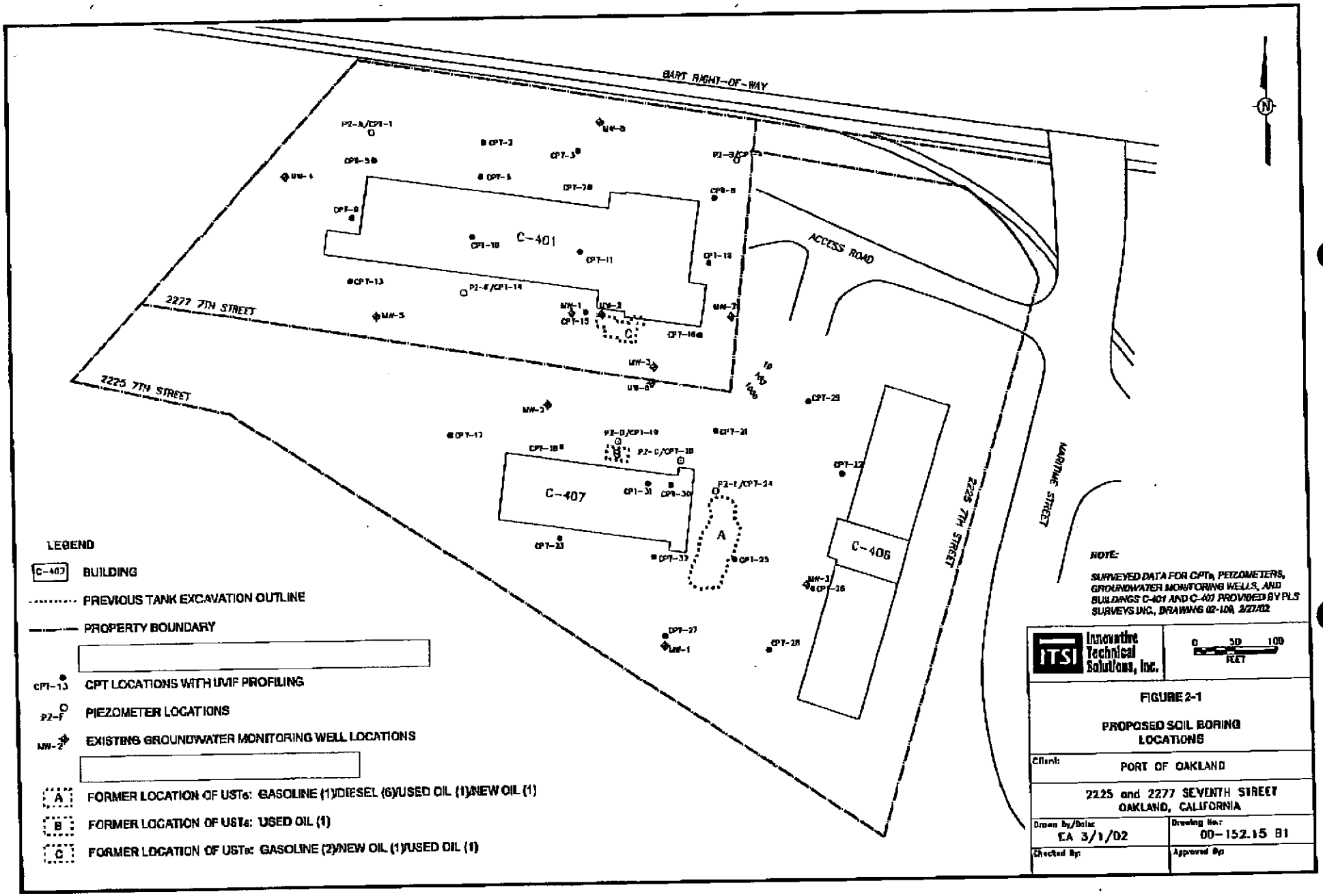


FID chromatogram from CPT-20, typical of the product samples from the majority of the CPTs and Monitoring Wells.



FID chromatogram from product sample collected from Wash Rack Sump.

Note different pattern with shift of peaks to the right, indicating higher boiling point compounds.


BART RIGHT-OF-WAY
2277 7TH STREET
2225 7TH STREET
ACCESS ROAD
MARITIME STREET
C-401
C-407
C-406
A
B
C
MW-1
MW-2
MW-3
MW-4
MW-5
MW-6
MW-7
CPT-1
CPT-2
CPT-3
CPT-4
CPT-5
CPT-6
CPT-7
CPT-8
CPT-9
CPT-10
CPT-11
CPT-12
CPT-13
CPT-14
CPT-15
CPT-16
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CPT-18
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CPT-24
CPT-25
CPT-26
CPT-27
CPT-28
CPT-29
CPT-30
CPT-31
CPT-32
CPT-33
P2-A/CPT-1
P2-B/CPT-9
P2-C/CPT-18
P2-D/CPT-19
P2-E/CPT-24
P2-F/CPT-14
N
LEGEND
BUILDING
PREVIOUS TANK EXCAVATION OUTLINE
PROPERTY BOUNDARY
CPT LOCATIONS WITH LMIF PROFILING
PIEZOMETER LOCATIONS
EXISTING GROUNDWATER MONITORING WELL LOCATIONS
FORMER LOCATION OF USTs: GASOLINE (1)/DIESEL (6)/USED OIL (1)/NEW OIL (1)
FORMER LOCATION OF USTs: USED OIL (1)
FORMER LOCATION OF USTs: GASOLINE (2)/NEW OIL (1)/USED OIL (1)
NOTE:
SURVEYED DATA FOR CPTs, PIEZOMETERS, GROUNDWATER MONITORING WELLS, AND BUILDINGS C-401 AND C-407 PROVIDED BY PLS SURVEYS INC., DRAWING 02-108, 2/27/02
ITSI Innovative Technical Solutions, Inc.
0 50 100
FEET
FIGURE 2-1
PROPOSED SOIL BORING LOCATIONS
Client: PORT OF OAKLAND
2225 and 2277 SEVENTH STREET OAKLAND, CALIFORNIA
Drawn By/Date: EA 3/1/02
Drawing No.: 00-152.15 B1
Checked By:
Approved By:

PORT OF OAKLAND

Environmental Health &
Safety Compliance
530 Water Street, 2nd Floor
Oakland, CA 94607

FAX:- (510) 451-5916
PHONE: (510) 627-1134

FACSIMILE TRANSMITTAL

TO	ACHCSA
ATTENTION	BARNEY CHAN
FROM	JEFF RUBIN
DATE & TIME	03/20/02 2:00PM
FAX NUMBER	(510) 337-9335
NO. OF PAGES	7

COMMENTS:

BARNEY,

ATTACHED ARE THE RESULTS (PRELIMINARY) FROM THE RECENT ITSI SITE CHARACTERIZATION @ 2277 AND 2225 - 7th STREET, PER YOUR REQUEST. PLEASE CALL ME IF YOU HAVE ANY QUESTIONS.

THANKS,

JEFF RUBIN 627-1134 (DIRECT)

Table 1

Analytical Results for Soil Samples
2225 and 2277 Seventh Street, Oakland

		Soil Results (in mg/kg)							
Sample ID	Date	Gasoline[1]	Diesel[2]	Motor Oil[2]	Benzene	Toluene	Ethylbenzene	Xylene(s)	MTBE
PZ-A 1.0-1.5'	2/11/02	< 1.0	4.9	< 50	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.0050
PZ-A 3.0-3.5'	2/11/02	< 1.0	2.2	< 50	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.0050
PZ-A 5.0-5.5'	2/11/02	< 1.0	< 1.0	< 50	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.0050
PZ-B 1.0-1.5'	2/12/02	< 1.0	120	360	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.0050
PZ-B 3.0-3.5'	2/12/02	< 1.0	2.2	< 50	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.0050
PZ-B 7.0-7.5'	2/12/02	< 1.0	< 1.0	< 50	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.0050
PZ-C 1.0-1.5'	2/12/02	< 1.0	4.7	< 50	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.0050
PZ-C 3.0-3.5'	2/12/02	< 1.0	3.1	< 50	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.0050
PZ-C 5.5-6.0'	2/11/02	74	2300	< 2500	< 0.62	< 0.62	< 0.62	1.3	< 0.62
PZ-D 1.0-1.5'	2/12/02	< 1.0	3.2	< 50	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.0050
PZ-D 3.0-3.5'	2/12/02	< 1.0	22	62	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.0050
PZ-D 5.0-5.5'	2/11/02	140	7700	< 5000	< 0.62	< 0.62	< 0.62	< 0.62	< 0.62
PZ-E 1.0-1.5'	2/13/02	< 1.0	19	< 50	< 0.0051	< 0.0051	< 0.0051	< 0.0051	< 0.0051
PZ-E 3.0-3.5'	2/13/02	< 1.0	17	< 50	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.0050
PZ-E 5.5-6.0'	2/13/02	280	20000	< 5000	< 0.62	< 0.62	< 0.62	< 0.62	< 0.62
PZ-F 1.0-1.5'	2/12/02	4.8	41	< 250	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.0050
PZ-F 3.0-3.5'	2/12/02	< 1.0	2.1	< 50	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.0050
PZ-F 5.0-5.5'	2/11/02	1.0	83	170	< 0.0050	< 0.0050	< 0.0050	< 0.0050	< 0.0050

mg/kg: milligrams per kilogram

R0187

Innovative Technical Solutions, Inc.

JAN 24 2002

January 22, 2002

Mr. Barney Chan
Hazardous Materials Specialist
Alameda County Environmental Health Services, Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

R0187

Implementation of the Workplan for Additional Site Characterization (dated 11/8/01)
2225 and 2277 Seventh Street Sites
Oakland, California

Dear Mr. Chan:

Innovative Technical Solutions, Inc. (ITSI), on behalf of our Client, the Environmental Health and Safety Compliance Department of the Port of Oakland, is pleased to inform you that drilling activities identified in the above referenced Workplan will commence on Monday January 28, 2002. Drilling permits were recently acquired and the utility clearance was completed today. If you have any questions or comments, please contact me at either 510-715-7842 or 925-946-3105.

Sincerely,

Rachel B. Hess
Project Manager

Cc: J. Rubin, EH&SC Department, Port of Oakland, 530 Water Street, Oakland, CA 94604
M. Heffes, Legal Department, Port of Oakland, 530 Water Street, Oakland, CA 94604

2730 Shadelands Drive, Suite 100
Walnut Creek, CA 94598

(925) 946-3100
fax (925) 256-8998
www.itsi.com

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

November 20, 2001
RO0000187/RO0000010

Mr. John Prall
Port of Oakland
530 Water St.
Oakland CA 94604

Re: Workplan for Additional Site Characterization 2225 and 2277 Seventh St. Oakland CA 94607

Dear Mr. Prall:

Our office has received and reviewed the November 8, 2001 work plan for the referenced sites as prepared by ITSI. I have also spoken with Mr. Jeff Hess and Ms. Rachel Hess of ITSI regarding its contents. As you are aware, the work plan initially was prepared to provide better subsurface lithology of the sites using cone penetration test (CPT) borings. Using the UVIF modification to the CPT will allow semi-quantitative estimation of petroleum contamination in the subsurface. Five of the proposed CPT locations will have a monitoring well installed adjacent to the boring, which will allow visual logging to confirm the CPT printout data. From this data, you will ideally receive sufficient characterization to prepare a feasibility study. Some of the wells installed may be used for remediation purposes in the future and the free product map may be confirmed or refined.

The work plan is approved. Please notify our office prior to initiating this work.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Ms. R. Hess, ITSI, 2730 Shadelands Drive, Suite 100, Walnut Creek, CA 94598
CPTwpap2225&2277 7thSt

PORT OF OAKLAND

JUL 17 2002

July 15, 2002

Barney Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 94502

Re: **Preliminary Draft Site Plan and Floor Plans - Future Port Field Support Services Complex - 2225 & 2277 Seventh Street, Port of Oakland, Oakland, California**

Dear Mr. Chan,

As you requested during our phone conversation today, please find enclosed the subject Port of Oakland (Port) preliminary draft site plan and floor plans for the future Port Field Support Services Complex at 2225 and 2277 Seventh Street in Oakland, California. This information is being submitted in accordance with Alameda County Health Care Services Agency (County) requirements for site development. Please note that the information is preliminary and will be modified. We will provide updated versions as they become available.

As mentioned during our phone conversation, we will keep you informed of the redevelopment process, including preparation and submittal of the human health risk assessment prior to redevelopment. If you have any questions, please contact me at (510) 627-1134.

Sincerely,

Jeffrey L. Rubin, CPSS, REA
Associate Port Environmental Scientist
Environmental Health and Safety Compliance

Enclosure: noted

Cc (w encl.): Chris Alger, Iris Environmental
Rachel Hess, Innovative Technical Solutions, Inc.
Barry MacDonnell, Port Engineering Dept.

Cc (w/o encl.): Jeff Jones, Port Environ. Health & Safety Compliance Dept.
Roberta Schoenholz, Port Environ. Health & Safety Compliance Dept.
Mikhail Korsunsky, Port Engineering Dept.

PORT OF OAKLAND

JUN 20 2002

June 17, 2002

Mr. Barney Chan
Hazardous Materials Specialist
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

-187

RE: Summary of June 4, 2002 Teleconference
Additional Site Characterization and Remedial Action Plan for 2225 and 2277 Seventh Street, Oakland, California

Dear Mr. Chan:

This letter documents our understanding of the agreements reached during our teleconference on June 4, 2002 regarding the Additional Site Characterization and Remedial Action Plan for the 2225 and 2277 Seventh Street site.

As indicated during the teleconference, the project team believes the proposed free product extraction system is the most cost-effective approach towards removal of free product and ultimate closure of the site. However, the Port of Oakland (Port) understands that additional steps may be required beyond the proposed free product extraction system to ultimately obtain site closure.

The need for additional steps will be dependant on the ultimate effectiveness of the free product extraction system, and the presence and concentration of residual dissolved-phase compounds in the groundwater following substantial removal of the free product. An evaluation of the presence and concentration of residual compounds will be conducted towards the end of the expected operational period for the proposed free product extraction system (based on the absence of recoverable free product in the extraction wells and nearby monitoring wells). An appropriate risk analysis can then be performed, as necessary, to evaluate risk associated with residual compounds identified at that time.

Also, as we discussed in the teleconference:

- Revised Figure 2 is attached indicating the location of the product sample collected from the wash rack.
- Monitoring well MW-8A will be retained, or replaced if needed, for continued use as part of the monitoring program at the site.

- Results of the recent IRIS investigation will be evaluated relative to the need for relocation and/or addition of proposed monitoring wells. If appropriate, we can further discuss placement of monitoring wells following this review.

If you have any questions or concerns regarding our understanding of these agreements, please contact me at (510) 627-1134.

Sincerely,

Jeffrey L. Rubin, CPSS, REA
Associate Port Environmental Scientist
Environmental Health and Safety Compliance

Attachment: noted

Cc (w encl.): Michele Heffes
Mikhail Korsunsky
Barry MacDonnell

Cc (w/o encl.): Jeff Jones
Roberta Schoenholz
Rachel Hess (ITSI)

LEGEND

- C-407 — BUILDING
- PROPERTY BOUNDARY
- CPT-13 — CPT LOCATIONS WITH UVIF PROFILING (ITSI, 2002)
- PZ-F — PIEZOMETER LOCATIONS (ITSI, 2002)
- MW-2 — EXISTING GROUNDWATER MONITORING WELL LOCATIONS
- FORMER LOCATION OF USTs
- MFC-20 — SOIL AND GRAB GROUNDWATER BORING (BY OTHERS, 2002)
- MFC-43 — SOIL BORING (BY OTHERS, 2002)
- SUMP (LOCATION OF SAMPLE CJRS-1)

NOTE:

SURVEYED DATA FOR CPTs, PEIZOMETERS, GROUNDWATER MONITORING WELLS, AND BUILDINGS C-401 AND C-407 PROVIDED BY PLS SURVEYS INC., DRAWING 02-100, 2/27/02

ITSI Innovative Technical Solutions, Inc.

0 50 100 FEET

FIGURE 2

SITE MAP WITH CPT, BORING AND PIEZOMETER LOCATIONS

Client: PORT OF OAKLAND	
2225 and 2277 SEVENTH STREET OAKLAND, CALIFORNIA	
Drawn by/Date: EA 5/20/02	Drawing No.: 00-152.15 B1
Checked By:	Approved By:

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

April 19, 2000

Mr. John Prall
Port of Oakland
530 Water Street
Oakland, CA 94607
STID 940

RE: Ringsby Terminals, 2225 7th Street, Oakland, CA 94607

Dear Mr. Prall:

It is my understanding after our conversation today Ringsby Terminals are no longer a tenant at the above site. The Port of Oakland is the property owner, and has taken over the site and assumed responsibility for the subsurface investigation and remediation at this site.

The First Quarter 1997 Groundwater Monitoring and Sampling Report is the most recent quarterly report in the site file for the above address. Please submit to this office within 30 days of the receipt of this letter the current status of the groundwater monitoring and sampling program. As the property owner of both 2225 and 2277th Street, include in the status report the hydrologic relationship between the two sites, and if there is evidence of subsurface contamination migration from one site to the other.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,

Larry Seto
Sr. Hazardous Materials Specialist

Cc: Leroy Griffin, City of Oakland-Fire Services, 1605 Martin Luther King, Oakland, CA 94612
Files

Table 4
Total and Organic Lead Analytical Results for Product Samples
2225 and 2277 Seventh Street, Oakland

Sample ID	Date Sample Collected	Total Lead in µg/g (ppm)[1]	Organic Lead in µg/g (ppm)[2]
CPT-20	1/28/02	<2.0	<5.0
CPT-19	1/30/02	<2.0	<5.0
CPT-30	2/1/02	<2.0	<5.0
CPT-14	1/29/02	14	6
PZ-F	2/15/02	1.8	7
CJRS-1 (sample from sump)	1/31/02	<2.0	<5.0
MW-1	2/8/02	20[3]	56
MW-3	2/8/02	<2.0	<5.0

µg/g: micrograms per gram ppm: parts per million

Samples analyzed by Friedman & Bruya, Inc.
1 - Total Lead was analyzed using EPA Method 6010
2 - Organic Lead (tetraethyl lead) analyzed using EPA Method 8082 Modified
3 - Chromatograph suggests the possible presence of tetraethyl lead (TEL).

11-4-97
Tom:
I do not have this file in my office.
Larry

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

Check again
Don
11-21-97

Don Ringsby
Ringsby Terminals, Inc.
P. O. Box 7240
3980 Quebec St., Suite 214
Denver, CO 80207

October 29, 1997

re: STID 940, 2225 - 7th St., Oakland, CA 94607

Dear Don Ringsby:

This office has received and reviewed a Groundwater Monitoring and Sampling Report, dated May 6, 1997, by Fluor Daniel GTI, for the above site. The following are comments about this report.

1. It may be acceptable to suspend the sampling of MW-1, MW-2, and MW-3 on the portion of property which you lease. The site is under tidal influence and you have presented good evidence that there is a barrier in the shallow zone between those wells and the other 8 on the Port of Oakland property.

2. The port of Oakland apparently is still encountering floating product in MW-1*, MW-3*, and MW-8* north of your leased site. However, this was not reported in this report. Further information needs to be submitted on the current status of the wells on the Port of Oakland property.

This case will be overseen by Larry Seto, who you may call with any questions at (510) 567-6774.

Sincerely,

Thomas F. Peacock, Manager
Division of Environmental Protection

c: Jaff Auchterlonie, Fluor Daniel GTI, 1401 Halyard Dr., Suite 140, West Sacramento, CA 95691
John Prall, Port of Oakland, 530 Water St., Oakland, CA 94607
LeRoy Griffin, Oakland Hazardous Materials
Gordon Coleman, Chief - files

[redacted]DA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

October 7, 1996
STID 940

Dongary Investments
PO Box 7240
Denver CO 80207
Attn: Don Ringsby

RE: Nations Way Transport, 2225-7th St., Oakland CA 94607

Dear Mr. Ringsby,

Since my last letter to you (dated 4/14/95), I have received the following documents:

1) "First Quarter 1995 Groundwater Monitoring and Sampling Report," prepared by Groundwater Technology Inc. (GTI), dated 4/26/95;

2) "Soil and Groundwater Assessment Report," prepared by GTI, dated 7/26/95;

3) "Third Quarter 1995 Groundwater Monitoring and Sampling Report," prepared by Groundwater Technology Inc. (GTI), dated 11/29/95;

4) fax from GTI, dated 1/2/96;

5) "Fourth Quarter 1995 Groundwater Monitoring and Sampling Report," prepared by Groundwater Technology Inc. (GTI), erroneously dated 1/19/95 (should be 1/19/96);

6) "First Quarter 1996 Groundwater Monitoring and Sampling Report," prepared by Groundwater Technology Inc. (GTI), dated 4/22/96; and

7) "Second Quarter 1996 Groundwater Monitoring and Sampling Report," prepared by Fluor Daniel GTI, dated 7/22/96.

Most of this documentation reflects the quarterly groundwater monitoring and sampling schedule. The 7/26/95 "Soil and Groundwater Assessment Report" documents results of a Geoprobe investigation conducted in May 1995, to further define the extent of the hydrocarbon plume. The report concluded that the approximate extent of the soil and water plume has been defined to the north, east, south, and west of the former diesel USTs; however, the northwestern limit has not been defined. The GTI report also concluded that the northern and northeastern extent of the groundwater plume has not been defined.

The Port of Oakland continues to remove free product from three of their wells (MW1, MW3, and MW8). They are changing consultants, and plan to utilize an automatic skimmer in MW3 to remove the free product on a continuous basis.

Due to the ND to low concentrations in the Dongary wells, it would be acceptable to reduce the groundwater monitoring and sampling frequency from quarterly to biannually (twice per year). Please sample in the 1st and 3rd quarters. Feel free to submit reports on double-sided paper.

If you have any questions, please contact me at 510-567-6761; our fax is 510-337-9335.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Jaff Auchterlonie, Groundwater Technology Inc., 1401 Halyard Dr., Suite 140, W. Sacramento CA 95691
John Prall, Port of Oakland, 530 Water St., Oakland CA 94607,
Kevin Graves, RWQCB
Jennifer Eberle/file

je.940-L

GROUNDWATER TECHNOLOGY, INC.
1400 Halyard Drive, Suite 140, West Sacramento, CA 95691, (916) 372-4700
FAX (916) 372-8781

TELECOPY MESSAGE

DATE: **January 2, 1996** **TIME:10:30 AM**

TO: **Ms Jennifer Eberle**
Alameda County Environmental Health Department (ACEHD)
Hazardous Materials

FAX #: (510) 337-9335 **Phone #: (510) 567-6761**

FROM: JAFF AUCHTERLONIE, GTI West Sacramento Office.

PROJECT: **Ringsby Terminals Site**, Port of Oakland, 2225 7th Street, Oakland, CA.
Quarterly Groundwater Monitoring & Sampling
Project Number 02070-0205

NUMBER OF PAGES (including cover page): 3

Ms. Eberle,

This FAX is in response to four questions presented in your FAX dated 12/26/95, that you sent to Groundwater Technology's West Sacramento office.

1) I have attached a copy of Table 1 summarizing the QM&S data for the subject site. As shown on the table, wells MW-1, MW-2, and MW-3 were gauged and sampled on 09/28/95. Due to an anomalous depth to water reading in well MW-1, all three wells were gauged a second time on 11/20/95 and the data used to calculate the groundwater gradient.

2) The second quarterly groundwater monitoring & sampling report was incorporated into Groundwater Technology's *Soil and Groundwater Assessment Report dated 07/26/95*.

3) Although an obstruction is present in MW-3, groundwater can be purged and water samples collected from the well. Since dissolved and separate phase hydrocarbons are usually found within the upper portion of the unconfined aquifer, removal of the obstruction would not substantially improve the quality of the water samples collected from well MW-3. Historical groundwater levels have been above the obstruction, allowing the continued collection of water samples from the well. **Since removal of the obstruction will not improve the quality of the water samples collected from MW-3, Groundwater Technology does not recommend additional work be carried out until the obstruction limits the collection of groundwater samples from well MW-3.**

4) The fourth quarter groundwater monitoring and sampling was conducted at the site on December 27, 1995 and the summary report will be completed in January 1996.

Sincerely

Jeff Auchterlonie

file:Dongary\Fax\ACEHD5.fax

Table 1

GROUNDWATER MONITORING AND ANALYTICAL DATA, 1993, 1994, and 1995

Concentrations in parts per billion (ppb), or micrograms per liter (µg/l)

Ringsby Terminals, Inc.- Port of Oakland
2225 7th Street, Oakland, California

WELL ID/ ELEVATION (TOC feet)	DATE	BENZENE	TOLUENE	ETHYL-BENZENE	XYLENES	TPH-G	TPH-D	DTW (feet)	SPT (feet)	GWE (feet)
MW-1	01/15/93	< 0.3	< 0.3	< 0.3	< 0.3	< 50	< 50	5.21	0.00	8.51
13.72	09/12/94	0.6	< 0.3	< 0.3	< 0.3	< 10 c	10,000	6.37	0.00	7.35
	11/30/94	< 0.3	< 0.3	< 0.3	< 0.3	< 10	2,800	5.76	0.00	7.96
	03/29/95	< 0.3	< 0.3	< 0.3	< 0.3	< 50	< 50	4.57	0.00	9.15
	05/25/95	—	—	—	—	—	—	5.14	0.00	8.58
	06/21/95	< 0.3	< 0.3	< 0.3	< 0.3	< 50	< 50 d	5.41	0.00	8.31
	06/23/95	—	—	—	—	—	—	5.44	0.00	8.28
	09/28/95	< 0.3	< 0.3	< 0.3	< 0.3	< 50	< 50	6.9 f	0.00	13.72
	11/20/95	—	—	—	—	—	—	6.28	0.00	7.44
MW-2	01/15/93	< 0.3	< 0.3	< 0.3	< 0.3	< 50	< 50	6.21	0.00	7.59
13.80	09/12/94	0.6	< 0.3	< 0.3	< 0.3	34 c	< 50	6.47	0.00	7.33
	11/30/94	0.9	< 0.3	< 0.3	< 0.3	< 10	81	6.34	0.00	7.46
	03/29/95	0.3	< 0.3	< 0.3	< 0.3	< 50 b	75	5.51	0.00	8.29
	05/25/95	—	—	—	—	—	—	5.60	0.00	8.20
	06/21/95	< 0.3	< 0.3	< 0.3	< 0.3	< 50 b	< 50	5.72	0.00	8.08
	06/23/95	—	—	—	—	—	—	5.72	0.00	8.08
	09/28/95	< 0.3	< 0.3	< 0.3	< 0.3	250 c	< 50	6.15	0.00	7.65
	11/20/95	—	—	—	—	—	—	6.42	0.00	7.38
MW-3	01/15/93	< 0.3	< 0.3	< 0.3	< 0.3	< 50	< 50	6.44	0.00	8.62
15.06	09/12/94	0.3	< 0.3	< 0.3	< 0.3	< 50	< 50	7.35	0.00	7.71
	11/30/94	< 0.3	< 0.3	< 0.3	< 0.3	110	150	7.12	0.00	7.94
	03/29/95	< 0.3	< 0.3	< 0.3	< 0.3	< 50	< 50	6.31	0.00	8.75
	05/25/95	—	—	—	—	—	—	6.75	0.00	8.31
	06/21/95	< 0.3	< 0.3	< 0.3	< 0.3	< 50 b	< 50 d	6.87	0.00	8.19
	06/23/95	—	—	—	—	—	—	6.88	0.00	8.18
	09/28/95	< 0.3	< 0.3	< 0.3	< 0.3	51 c	< 50	7.28	0.00	7.78
	11/20/95	—	—	—	—	—	—	7.51	0.00	7.55

GROUNDWATER TECHNOLOGY

Table 1

GROUNDWATER MONITORING AND ANALYTICAL DATA, 1993, 1994, and 1995

Concentrations in parts per billion (ppb), or micrograms per liter (µg/l)

Ringsby Terminals, Inc.- Port of Oakland
2225 7th Street, Oakland, California

WELL ID/ ELEVATION (TOC:feet)	DATE	BENZENE	TOLUENE	ETHYL-BENZENE	XYLENES	TPH-G	TPH-D	DTW (feet)	SPT (feet)	GWE (feet)
MW-1*	11/30/94	—	—	—	—	—	—	9.51	0.91	5.43
14.14	03/29/95	—	—	—	—	—	—	7.67	0.17	6.62
	05/23/95	—	—	—	—	—	—	8.68	0.17	5.61
	06/23/95	—	—	—	—	—	—	9.60	1.40	5.77
	09/28/95							9.85	1.11	5.26
MW-2*	11/30/94	—	—	—	—	—	—	8.91	0.00	5.45
14.36	03/29/95	—	—	—	—	—	—	7.47	0.00	6.89
	05/23/95	—	—	—	—	—	—	—	—	—
	06/23/95	—	—	—	—	—	—	8.62	0.00	5.74
	09/28/95							9.17	0.00	5.19
MW-3*	11/30/94	—	—	—	—	—	—	13.07	5.21	5.71
14.22	03/29/95	—	—	—	—	—	—	9.59	2.93	7.19
	05/23/95	—	—	—	—	—	—	11.09	6.46	6.78
	06/23/95	—	—	—	—	—	—	12.21	6.09	7.34
	09/28/95							13.60	5.60	5.52

EXPLANATION:

TPH-G = Total petroleum hydrocarbons-as-gasoline
TPH-D = Total petroleum hydrocarbons-as-diesel
DTW = Depth to water
SPT = Separate-phase thickness
GWE = Groundwater elevation
MSL = Mean sea level
TOC = Top of casing
+= Possible well gauging error, data not used
— = Not analyzed or no sample/measurment collected

~ = Sample also analyzed using EPA 624, volatile organics were present.
a = Uncategorized compound not included in the hydrocarbon concentration
b = Uncategorized compound not included in the gasoline concentration
c = Hydrocarbon pattern is not characteristic of gasoline
d = Hydrocarbon pattern present in sample is not characteristic of diesel

SURVEY INFORMATION:

Well #	TOC	Grade	Property/well Owner
MW-1	13.72	—	Ringsby Terminals, Inc.
MW-2	13.60	—	Ringsby Terminals, Inc.
MW-3	15.06	—	Ringsby Terminals, Inc.
MW-1*	14.14	—	Port of Oakland
MW-2*	14.36	—	Port of Oakland
MW-3*	14.22	—	Port of Oakland

GWE for wells with separate phase hydrocarbons calculated assuming a specific gravity of (0.875)
Wells surveyed to Port of Oakland Datum
12/06/94, (3.2 feet below mean sea level)

GROUNDWATER TECHNOLOGY

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

April 14, 1995
STID 940

Dongary Investments
PO Box 7240
Denver CO 80207
Attn: Don Ringsby

RE: Nations Way Transport, 2225-7th St., Oakland CA 94607

Dear Mr. Ringsby,

I am in receipt of the "Amended Work Plan for Soil and Groundwater Assessment," dated 4/7/95, prepared by Groundwater Technology Inc. (GTI). As you know, this workplan involves the drilling of eight Geoprobe points, located to the northwest, north, and northeast of the former Dongary UST excavation. The Geoprobe is a type of direct penetration technology (DPT) which can enable us to gather soil and water (or free product) samples in a timely and cost effective manner, especially for such a large site as this.

The 4/7/95 Amended Work Plan by GTI is acceptable. Please notify me at least 2 business days in advance of field activities, so I may arrange to be onsite.

Please understand that permanent well points may be required in the future, based on the results of this investigation. If you have any questions, please contact me at 510-567-6761; our fax is 510-337-9335.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Port of Oakland, 530 Water St., Oakland CA 94607, Attn: Dan Schoenholz
Jaff Auchterlonie, Groundwater Technology Inc., 1401 Halyard Dr., Suite 140, W. Sacramento CA 95691
Bob Katin, Groundwater Technology Inc., 4057 Port Chicago Hwy, Concord CA 94520
Kevin Graves, RWQCB
Gil Jensen, Alameda County District Attorney's Office
Ariu Levi/file

je.940-K

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR
DEPARTMENT OF ENVIRONMENTAL HEALTH
ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIVISION
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

March 14, 1995
STID 940

Dongary Investments
PO Box 7240
Denver CO 80207
Attn: Don Ringsby

RE: Nations Way Transport, 2225-7th St., Oakland CA 94607

Dear Mr. Ringsby,

I am in receipt of the "Work Plan for Soil and Groundwater Assessment," dated 2/24/95, prepared by Groundwater Technology Inc. (GTI). As you know, this workplan involves the drilling of two groundwater monitoring wells. One well is located approximately 25' north of the former UST pit, and the other well is located approximately 150' northeast of the former UST pit.

During the ensuing review of this case, and during subsequent telephone conversations with your consultant, Jaff Auchterlonie of GTI, I explained the inadequacy of this workplan. Two wells are simply not enough points to clarify the following data gaps:

1) The extrapolation of the change in soil lithology between the coarser grained material as seen in BH11, and the finer grained material as seen in BH10.

2) The definition of both the free and dissolved product plumes, originally noted during the Dongary UST removals in 7/92.

Jaff Auchterlonie of GTI and I discussed the use of a rapid site assessment tool, which would give us a lot more data in a cost effective manner. The use of a Geoprobe was proposed by Mr. Auchterlonie. The Geoprobe is one form of direct penetration technology (DPT) which can enable us to gather soil and water (or free product) samples in a timely and cost effective manner, especially for such a large site as this.

I subsequently received two faxes from Mr. Auchterlonie, dated 3/13/95 and 3/14/95. These faxes include a site map with proposed locations for DPT (or Geoprobe) points. As discussed with Mr. Auchterlonie on 3/14/95, **this approach is acceptable, on the condition that one extra (8th) data point be located approximately 40' NW from Dongary's former UST pit.** This extra point is important because, along with point #7, it will enable us to better understand the distribution of the free product plume between the Dongary UST pit and the Port's UST pit (Building C-401).

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

May 10, 1995
STID 3899

Dan Schoenholz
Port of Oakland
Environmental Department
530 Water Street, 5th Floor
Oakland, CA 94607

RE: 2277-7TH STREET, BUILDING C-401, OAKLAND CA 94607

Dear Mr. Schoenholz:

I am in receipt of the "Work Plan for Supplemental Site Investigation," prepared by Alisto Engineering Group, dated 3/30/95. As you know, this workplan involves approximately 10 soil borings, located to the north, south, and west of Building C-401. **This workplan is acceptable for implementation, with the understanding that a separate workplan will be subsequently submitted to this office for monitoring well (MW) installation.**

The MW workplan can be brief, since some of the standard operating procedures have already been specified in Alisto's 3/30/95 workplan. Please include a site map with MW locations, a site map including boring locations from the current phase of work, as well as the corresponding tabulated data. Please note that **well development should occur a minimum of 72 hours after well construction,** as per Section 2649 of 23 CCR (the UST regulations).

I am also in receipt of the free product removal update, sent under your cover letter dated 3/8/95. I assume that free product removal continues on a weekly basis. **Please continue to submit bi-monthly (every other month) updates on free product removal. The next update is therefore due.**

Lastly, I am in receipt of your letter dated 1/30/95, with the attached documentation of offhauling of recovered "free product," dated 10/20/94. You indicated that another pickup of product occurred on 1/19/95. **Please forward this documentation, as well as subsequent documentation of product offhauling.**

Please contact me at 510-567-6761 should you have any questions. For your information, our agency facsimile number is now 510-337-9335.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Don Ringsby, Dongary Investments, PO Box 7240, Denver CO 80207
Neil Werner, Port of Oakland, 530 WAter St., Oakland CA 94607
Brady Nagle, Alisto Engineering Group, 1575 Treat Blvd, suite 201, Walnut Creek CA 94598
Jaff Auchterlonie, Groundwater Technology Inc., 1401 Halyard Dr., Ste 140, W. Sacramento CA 94591
Kevin Graves, RWQCB
Gil Jensen, Alameda County District Attorney's Office
Bill Raynolds/file

je 3899-C

Therefore, you are requested to submit an addendum to the 2/24/95 Workplan by GTI, specifying the methodology for the DPT approach, within 30 days (or sooner), or by April 14, 1995. This letter is being faxed both to you and to GTI for timeliness.

All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; and b) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted **under seal** of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.

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. Kindly submit a cover letter with your consultant's reports.

If you have any questions, please contact me at 510-567-6761; our fax is 510-337-9335. **PLEASE NOTE THAT OUR NEW ADDRESS IS 1131 HARBOR BAY PARKWAY, 2nd FLOOR, ALAMEDA CA 94502.**

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Port of Oakland, 530 Water St., Oakland CA 94607, Attn: Dan Schoenholz
Jaff Auchterlonie, Groundwater Technology Inc., 1401 Halyard Dr., Suite 140, W. Sacramento CA 95691
Bob Katin, Groundwater Technology Inc., 4057 Port Chicago Hwy, Concord CA 94520
Kevin Graves, RWQCB
Gil Jensen, Alameda County District Attorney's Office
Ed Howell/file

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR
DEPARTMENT OF ENVIRONMENTAL HEALTH
ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIVISION
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

March 14, 1995
STID 940

Dongary Investments
PO Box 7240
Denver CO 80207
Attn: Don Ringsby

RE: Nations Way Transport, 2225-7th St., Oakland CA 94607

Dear Mr. Ringsby,

I am in receipt of the "Work Plan for Soil and Groundwater Assessment," dated 2/24/95, prepared by Groundwater Technology Inc. (GTI). As you know, this workplan involves the drilling of two groundwater monitoring wells. One well is located approximately 25' north of the former UST pit, and the other well is located approximately 150' northeast of the former UST pit.

During the ensuing review of this case, and during subsequent telephone conversations with your consultant, Jaff Auchterlonie of GTI, I explained the inadequacy of this workplan. Two wells are simply not enough points to clarify the following data gaps:

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Therefore, you are requested to submit an addendum to the 2/24/95 Workplan by GTI, specifying the methodology for the DPT approach, within 30 days (or sooner), or by April 14, 1995. This letter is being faxed both to you and to GTI for timeliness.

All work should adhere to a) the Tri-Regional Board Staff Recommendations *for* Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; and b) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted **under seal** of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.

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. Kindly submit a cover letter with your consultant's reports.

If you have any questions, please contact me at 510-567-6761; our fax is 510-337-9335. **PLEASE NOTE THAT OUR NEW ADDRESS IS 1131 HARBOR BAY PARKWAY, 2nd FLOOR, ALAMEDA CA 94502.**

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Port of Oakland, 530 Water St., Oakland CA 94607, Attn: Dan Schoenholz
Jaff Auchterlonie, Groundwater Technology Inc., 1401 Halyard Dr., Suite 140, W. Sacramento CA 95691
Bob Katin, Groundwater Technology Inc., 4057 Port Chicago Hwy, Concord CA 94520
Kevin Graves, RWQCB
Gil Jensen, Alameda County District Attorney's Office
Ed Howell/file

je.940-J

GROUNDWATER TECHNOLOGY, INC.
1401 Halyard Drive, Suite 140, West Sacramento, CA 95691, (916) 372-4700
FAX (916) 372-8781

TELECOPY MESSAGE

DATE: March 14, 1995 **TIME: 3:15 PM**

TO: **Ms Jennifer Eberle**
Alameda County Environmental Health Department (ACEHD)
Hazardous Materials

FAX #: **(510) 337-9335** **Phone #:** **(510) 567-6761**

FROM: JAFF AUCHTERLONIE, GTI West Sacramento Office.

PROJECT: Dongary Investments, Port of Oakland, 2225 7th Street, Oakland, CA.
Groundwater Monitoring Well Installation Work Plan Modifications.

NUMBER OF PAGES (including cover page): 2

Ms. Eberle,

In the voice mail message that you gave to me today, **two requests were made:**

1) **the addition of two DPD or geo-probe points, placed to the northwest of the former UST pit,** to the six points that Groundwater Technology proposed in a FAX to you on March 13, 1995.

2) Required additional information on direct penetration technology.

After review of the request with Dongary Investments, Groundwater Technology Proposes a soil and groundwater site assessment consisting of 7 DPD points, **with one DPD point located northwest of the former UST pit** (Figure 2). With written approval of the proposed DPD survey from the ACEHD, Groundwater Technology, with Dongary Investments approval, will release an addendum to the original work plan. The addendum will detail the DPD survey procedures, soil and groundwater sampling plan, and analytical methods. The addendum will detail the DPD survey procedures, soil and groundwater sampling plan, and analytical methods.

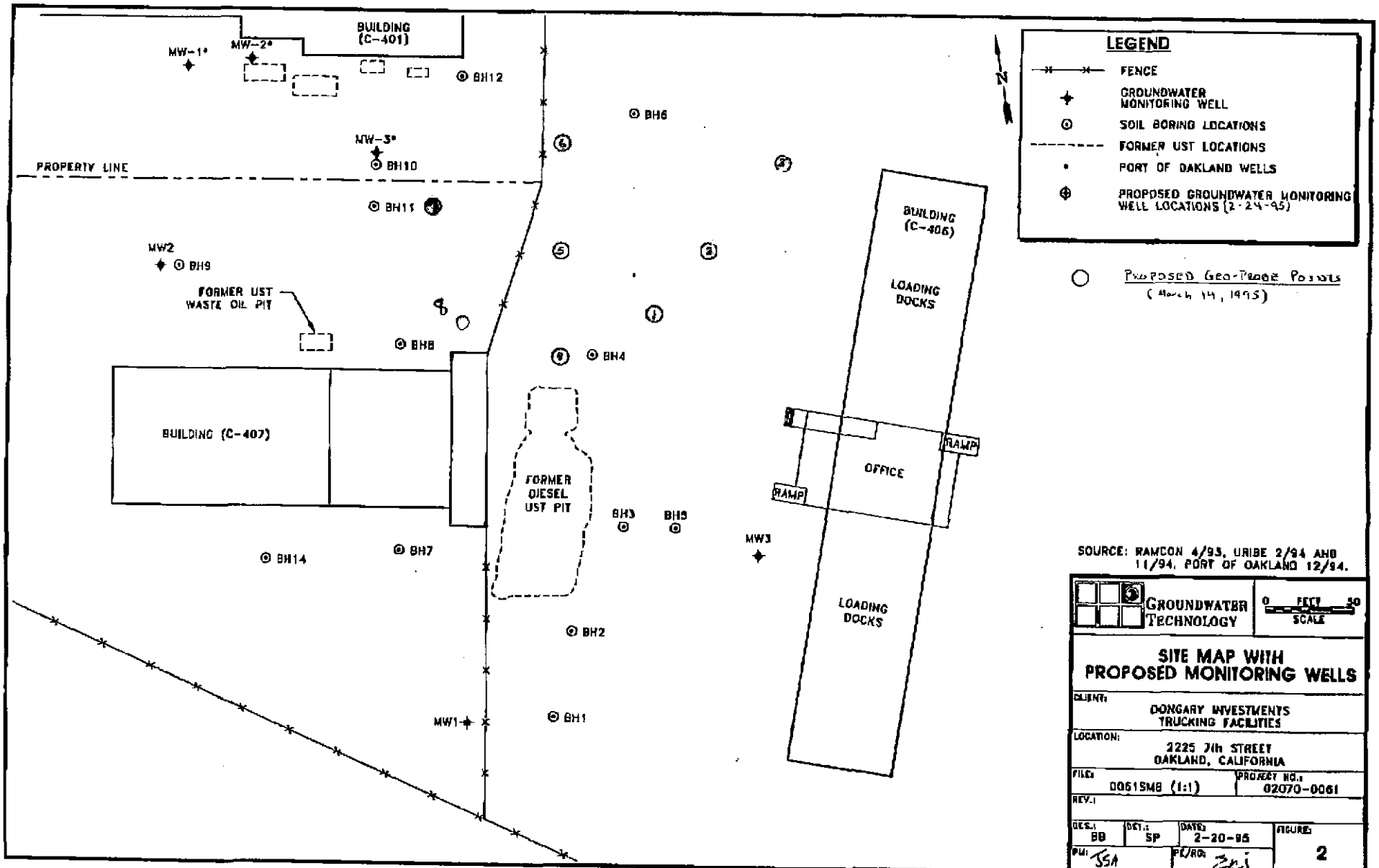
I have attached a drilling vendors (Enviro-Core) sampling procedure description for you. Note: differences exist between direct penetration drilling companies, but the basic concepts are the same.

Please let me know what your thoughts are. I will be in the office this week to discuss the project.

Sincerely

Jaff Auchterlonie

file:Dongary\Fax\ACEHD3.fax



PRECISION SAMPLING, INC.

SOIL CORING, SOIL VAPOR SAMPLING, AND TEMPORARY PIEZOMETER INSTALLATION PROCEDURES

SOIL CORING PROCEDURES

Soil cores will be obtained by PRECISION SAMPLING, INC. (PSI), a soil and ground water sampling company located in San Rafael, California. PSI uses portable, hydraulically-driven soil coring systems to obtain soil and ground water samples for lithologic and chemical analysis. PSI's difficult access rig, the DA-1, utilizes a hydraulic hammer to drive Enviro-Core™ sampling rods into the ground to collect continuous soil cores. The larger sampling rigs, the XD-1 and MD-1, are mounted on 4-wheel-drive vehicles, and the Enviro-Core™ rods are advanced with vibrators, a hydraulic hammer, or pushed into the ground. With any rig, two nested sampling rods are driven simultaneously: small-diameter inner sampling rods are used to obtain and retrieve the soil cores; the larger diameter (2 3/8" OD) outer rods serve as temporary drive casing.

As the Enviro-Core™ rods are advanced, soil is driven into a 1 5/8-inch-diameter, 3-foot-long sample barrel that is attached to the end of the inner rods. Soil samples are collected in 1 1/2-inch-diameter by 6-inch-long stainless steel sleeves inside the sample barrel as both rods are advanced. After being driven 3 feet, the inner rods are removed from the borehole with a hydraulic winch. The stainless sleeves containing the soil samples are removed from the drive sampler, and can then be preserved for chemical analyses or used for lithologic identification. After adding new stainless steel sleeves, the drive sampler and inner rods are then lowered back into the borehole to the previous depth, an additional 3-foot section of Enviro-Core™ rods (both inner and outer) is attached, and the process is repeated until the desired depth is reached.

The use of outer rods prevents sloughing of the formation while the inner rods are withdrawn from the hole. This ensures that the drive sampler will always be sampling soil from the desired interval, rather than potentially contaminated soil that has sloughed in from higher up in the hole.

All drive samplers, sample rods, and tools will be cleaned with a high-pressure, hot water washer between holes. Drive samplers will be washed with trisodium phosphate and double-rinsed with deionized water between samples collected in the same hole. All rinsate from the cleaning will be contained in 55-gallon drums at the project site.

GROUNDWATER SAMPLING PROCEDURES

After the targeted water-bearing zone has been penetrated, the sample barrel and inner rods will be removed from the borehole, and the drive casing will be pulled up approximately three feet to allow groundwater to flow into the borehole. 1-inch-diameter Schedule 40 PVC casing with a five foot section of .010" slotted well screen may be installed in the borehole to facilitate the collection of groundwater samples. Threaded sections of PVC are lowered into the borehole inside the drive casing. The drive casing is then pulled up to expose the slotted interval of the PVC. Groundwater samples may then be collected from within the PVC casing with a 1-inch-diameter Teflon or stainless steel bailer until adequate sample volume is obtained.

BOREHOLE GROUTING

On completion of soil and water sampling, boreholes will be abandoned with a grout mixture of Type II cement with 4% pure sodium bentonite. The grout will be pumped through a 1-inch-diameter grouting tube positioned at the bottom of the boreholes, prior to withdrawing the outer rods.

GROUNDWATER TECHNOLOGY, INC.
1401 Halyard Drive, Suite 140, West Sacramento, CA 95691, (916) 372-1700
FAX (916) 372-8781

TELECOPY MESSAGE

DATE: **March 14, 1995** **TIME: 5:40 PM**

TO: **Ms Jennifer Eberle**
Alameda County Environmental Health Department (ACEHD)
Hazardous Materials

FAX #: **(510) 337-9335** **Phone #:** **(510) 567-6761**

FROM: JAFF AUCHTERLONIE, GTI West Sacramento Office.

PROJECT: Dongary Investments, Port of Oakland, 2225 7th Street, Oakland, CA.
Groundwater Monitoring Well Installation Work Plan Modifications.

NUMBER OF PAGES (including cover page): 2

Ms. Eberle,

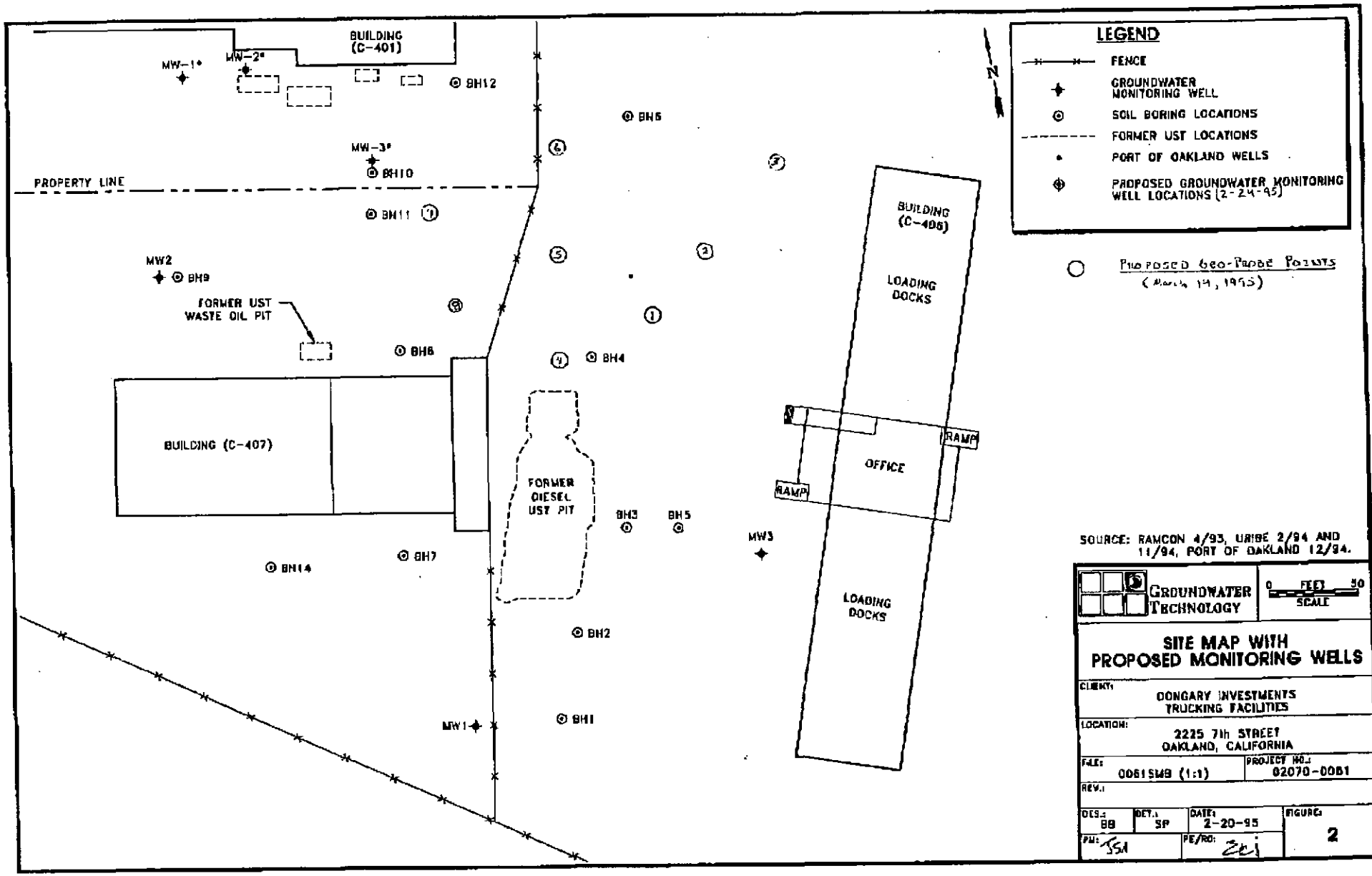
As we discussed during our phone conversation at 4:55 PM today, I have added the eighth DPD point to the proposed Groundwater Technology soil and groundwater site assessment (Figure 2). The eighth point was added at the request of ACEHD. The eight DPD points will be pressed to depths ranging from 10 to 15 feet below grade surface: three points to 15 feet and 5 points to 10 feet BGS. All points will be used as insertion points for temporary 1.25-inch diameter PVC well points. Each temporary well point will be used to gather water samples and measure the depth to groundwater and product thickness, if present. With written approval of the proposed DPD survey from the ACEHD, Groundwater Technology, with Dongary Investments approval, will release an addendum to the original work plan. The addendum will detail the DPD survey procedures, soil and groundwater sampling plan, and analytical methods. ~~The addendum will detail the DPD survey procedures, soil and groundwater sampling plan, and analytical methods.~~

Please let me know what your thoughts are. I will be in the office this week to discuss the project.

Sincerely

Jaff Auchterlonie

file:Dongary\Fax\ACEHD4.fax


BUILDING (C-401)
MW-1*
MW-2*
BH12
BH9
MW-3*
BH10
PROPERTY LINE
BH11
MW2
BH9
FORMER UST WASTE OIL PIT
BH8
BUILDING (C-407)
BH14
BH7
FORMER DIESEL UST PIT
BH4
BH3
BH5
MW3
BH2
MW1
BH1
BUILDING (C-406)
LOADING DOCKS
RAMP
OFFICE
RAMP
LOADING DOCKS
N
LEGEND
FENCE
GROUNDWATER MONITORING WELL
SOIL BORING LOCATIONS
FORMER UST LOCATIONS
PORT OF OAKLAND WELLS
PROPOSED GROUNDWATER MONITORING WELL LOCATIONS (2-24-95)
PROPOSED Geo-Probe Points (March 14, 1995)
SOURCE: RAMCON 4/93, URIBE 2/94 AND 11/94, PORT OF OAKLAND 12/94.
GROUNDWATER TECHNOLOGY
0 FEET 50
SCALE
SITE MAP WITH PROPOSED MONITORING WELLS
CLIENT: DONGARY INVESTMENTS TRUCKING FACILITIES
LOCATION: 2225 7th STREET OAKLAND, CALIFORNIA
FILE: 0061SMB (1:1)
PROJECT NO.: 02070-0061
REV.:
DES.: BB
DFT.: SP
DATE: 2-20-95
FIGURE: 2
PM: TSM
PE/RG:

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR
DEPARTMENT OF ENVIRONMENTAL HEALTH
ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIVISION
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

January 17, 1995
STID 940

Dongary Investments
PO Box 7240
Denver CO 80207
Attn: Don Ringsby

RE: Nations Way Transport, 2225-7th St., Oakland CA 94607

Dear Mr. Ringsby,

I am in receipt of the non-hazardous waste manifests for the disposal of approximately 870 cubic yards of contaminated, stockpiled soil, under cover letter from ERM, dated 9/12/94.

I am also in receipt of the "Groundwater Monitoring and Sampling Report," prepared by Groundwater Technology Inc. (GTI), dated 9/20/94. This report documents groundwater monitoring and sampling activities conducted on 9/12/94. It appears that you have established a quarterly groundwater monitoring/sampling program, as requested in my last letter, dated 7/26/94.

Upon review of the data, it is likely that floating product lies on the groundwater table beneath the Dongary sublease. This is indicated by the discussion and the boring logs in the "Soil and Groundwater Site Assessment," prepared by Ramcon, dated 3/18/93. The three wells existing on the Dongary sublease do not adequately delineate both the dissolved and non-dissolved phases of the groundwater plume. Groundwater conditions closer to the potential source of contamination (UST excavation), as well as to the north and northeast of the UST excavation, need to be assessed. **Therefore, you are requested to submit a workplan for groundwater investigation in this area within 45 days, or by March 6, 1995.**

All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; and b) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted **under seal** of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.

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. Kindly submit a cover letter with your consultant's reports.

If you have any questions, please contact me at 510-567-6761; our fax is 510-337-9335. **PLEASE NOTE THAT OUR NEW ADDRESS IS 1131 HARBOR BAY PARKWAY, 2nd FLOOR, ALAMEDA CA 94502.**

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Port of Oakland, 530 Water St., Oakland CA 94607, Attn: Dan Schoenholz
Jaff Auchterlonie, Groundwater Technology Inc., 1401 Halyard Dr., Suite 140, W. Sacramento CA 95691
Bob Katin, Groundwater Technology Inc., 4057 Port Chicago Hwy, Concord CA 94520
Kevin Graves, RWQCB
Gil Jensen, Alameda County District Attorney's Office
Ed Howell/file

je940-I

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

December 29, 1994
STID 3899

Dan Schoenholz
Port of Oakland
Environmental Department
530 Water Street, 5th Floor
Oakland, CA 94607

RE: 2277 7TH STREET, BUILDING C-401, OAKLAND CA 94607

Dear Mr. Schoenholz:

I am in receipt of your December 27, 1994 request to discontinue free product recovery from wells located at the referenced site pending negotiation with Dongary Investments (Dongary) to cooperatively design and construct an automatic recovery system. We understand that the Port has already discontinued manual product recovery.

Please be advised that Section 2655 of Title 23, California Code of Regulations (CCR) requires the owner or operator of the subject tank site to remove free product to the maximum extent practical, *as determined by the local agency*. Such product removal shall continue in a fashion which minimizes the spread of contamination into previously uncontaminated areas. Please be aware that Section 2722 of Article 11, 23CCR, further requires the responsible party to implement interim remedial action (such as free product removal) to abate the actual or potential effects of an unauthorized release. Such may *and should* occur concurrently with any other phase of corrective action.

Therefore, pending successful negotiations with Dongary for the design, construction, and implementation of the cited automatic recovery system, this agency requires that <u>interim</u> manual product recovery continue on a weekly basis, at a minimum.

I will be contacting Mr. Kevin Graves of the San Francisco Bay Regional Water Quality Control Board (RWQCB) to discuss the technical merit of requiring a joint investigation and corrective action plan for the subject and adjoining Dongary sites. I anticipate that a subsequent meeting will be called with the Port, Dongary, RWQCB and this agency to craft a comprehensive, cooperative corrective action effort between the responsible parties.

Lastly, please submit legible records documenting the appropriate disposal of the product recovered from the subject wells to date.

Please contact me at 510-567-6761 should you have any questions. For your information, our agency facsimile number is now 510-337-9335.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Don Ringsby, Dongary Investments, PO Box 7240, Denver CO 80207
Neil Werner, Port of Oakland, 530 WAter St., Oakland CA 94607
Gerry Slattery, Uribe, 2930 Lakeshore Ave, Oakland CA 94610
Jaff Auchterlonie, Groundwater Technology Inc., 1401 Halyard Dr., Ste 140, W. Sacramento CA 95691
Kevin Graves, RWQCB
Gil Jensen, Alameda County District Attorney's Office
Ed Howell/file

je 3899-B

DONGARY INVESTMENTS, LTD.

EXECUTIVE OFFICES
P.O Box 7240
Denver, Colorado 80207
303-320-3960

Post-it™ Fax Note 7671	Date 9-7-94	# of pages ▶ -1-
To Eric Floyd	From D.W. Ringsby	
Co./Dept. ERM	Co. Dongary Investments	
Phone #	Phone # 303-320-3960	
Fax # 510-946-9968	Fax #	

September 7, 1994

Eric Floyd
ERM EnviroClean-West
1777 Botelho Drive
Suite 200
Walnut Creek CA 94596

Dear Mr. Floyd:

On August 4, 1994 during our phone conversation, you promised to provide the documentation concerning the disposal of the contaminated stockpile at 2225 7th Street in Oakland to Alameda County.

Jennifer Eberle informed me on September 6, 1994 that no documentation has been received.

Please provide it to her as soon as possible with a copy to me.

Thanks,

D.W. Ringsby

Donald W. Ringsby
President

DWR/ms

cc: Jennifer Eberle ✓

DONGARY INVESTMENTS, LTD.

EXECUTIVE OFFICES
P.O Box 7240
Denver, Colorado 80207
303-320 3960

September 6, 1994

Jennifer Eberle
Hazardous Materials Specialist
Alameda County Health Care Services
1131 Harbor Bay Parkway - 2nd Floor
Alameda CA 94502

Dear Ms. Eberle:

Following up our conversation of today I am officially requesting an extention of time to begin the quarterly groundwater monitoring/sampling program at the Nations Way terminal.

I request a two week extension in order to hire a new environmental contractor to replace ERM. The new deadline will be September 23, 1994.

Thank you for your cooperation.

Donald W. Ringsby
President

DWR/ms

ALAMED[redacted]
HEALTH CA[redacted]SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

July 26, 1994
STID 940

Dongary Investments
PO Box 7240
Denver CO 80207
Attn: Don Ringsby

RE: ANR Freight, 2225-7th St., Oakland CA 94607

Dear Mr. Ringsby,

The latest correspondence that I am in receipt of is the letter from Robert Katin of ERM dated 6/16/94. This letter indicates that the three wells on this site were checked for floating product on 6/14/94, and that no product or sheen were noted. In my last letter to you, dated 6/7/94, you were requested to **"please notify me at least 2 business days in advance of field activities."** I did not receive any such notification.

According to my files, the last documented sampling event for this site was 1/15/93 ("Soil and Groundwater Site Assessment," Ramcon, 3/18/93). The sampling program was postponed due to the "impending" implementation of the remediation workplan. This workplan was dated 7/12/93, and was received in this office on 7/14/93. As you know, this workplan has not been implemented, and it has been 1 1/2 years since the last sampling event.

According to 23 CCR, Div.3, Ch. 16, Sect. 2652 (d), "until investigation and cleanup are complete, the owner or operator shall submit reports to the local agency. . .every 3 months or more frequently as specified by the agency. Reports shall include . . .monitoring or other corrective actions. . ." **Therefore, you are requested to begin a quarterly groundwater monitoring/sampling program, and to submit the first report within 45 days, or by September 9, 1994.**

In addition, you must properly dispose the contaminated stockpile which is still onsite. Please submit disposal documentation within 30 days, or by August 26, 1994.

If you have any questions, please contact me at 510-337-2868. If no answer, then you leave a message at 510-271-4320. Please note that these are temporary phone numbers. We do not know what the permanent phone number is, or when it will be changed. **PLEASE NOTE THAT OUR NEW ADDRESS IS 1131 HARBOR BAY PARKWAY, 2nd FLOOR, ALAMEDA CA 94502.** Our new fax is 510-337-9335.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Bob Katin, ERM EnviroClean-West, 1777 Botelho Dr., Suite 200, Walnut Creek CA 94596
Port of Oakland, 530 Water St,, Oakland CA 94607, Attn: Dan Schoenholz
Kevin Graves, RWQCB
Gil Jensen, Alameda County District Attorney's Office
Ed Howell/file

je 940-H

PORT OF OAKLAND

June 29, 1994

Jennifer Eberle
Hazardous Materials Specialist
Alameda County Health Care Services Agency
80 Swan Way, Rm. 350
Oakland, CA 94621

Dear Ms. Eberle:

SUBJECT: FREE PRODUCT REMOVAL AT 2277 7TH ST (Port Contract # 93394)

This letter is in response to your letter dated June 7, 1994, to Don Ringsby and myself. In that letter, you directed the Port of Oakland and Dongary Investments to remove free product and perform weekly monitoring for free product in newly-installed groundwater monitoring wells at 2277 7th St.

Because the letter was addressed to both Mr. Ringsby and me, I contacted Mr. Ringsby to discuss the matter. He stated that Dongary Investments did not intend to perform the tasks outlined in your letter, and that he felt that these tasks were the Port's responsibility.

As I stated in my letter to you dated May 31, 1994, monitoring well MW-1 is upgradient of the Port's tanks given our current understanding of the groundwater gradient. Therefore, it appears that the floating product in MW-1 is coming from the Dongary Investments site. However, because the Port was named in your letter, and because Dongary Investments will not perform the work you directed, the Port has arranged to have the free product removed from the wells on June 30, 1994, and to perform subsequent weekly monitoring for free product. Verbal notice of our intent was provided to you on June 27, 1994.

If you have any questions, please feel free to contact me at 272-1220.

Sincerely,

Dan Schoenholz
Associate Environmental Scientist

530 Water Street ■ Jack London's Waterfront ■ P.O. Box 2064 ■ Oakland, California 94604-2064
Telephone (510) 272-1100 ■ Fax (510) 272-1172 ■ Cable address, PORTOFOAK, Oakland

cc: Don Ringsby, Dongary Investments
Terry Surel
James McGrath
Neil Werner

ERM-West, Inc.

1777 Botelho Drive
Suite 260
Walnut Creek, CA 94596
(510) 946-0455
(510) 946-9968 (Fax)

June 16, 1994

Ms. Jennifer Eberle
Hazardous Materials Specialist
Alameda County Health Care Services Agency
Department of Environmental Health
80 Swan Way, Room 350
Oakland, California 94621

ERM

SUBJECT: Dongary Investment Facility
2225 7th Street
Oakland, California

Dear Ms. Eberle:

As you know, ERM EnviroClean-West, Inc. (EnviroClean) has been retained by Dongary Investments, Ltd. (Dongary) to assist in remediation of the above referenced facility.

We received your letter dated June 7, 1994. We did not believe it was directed to Dongary Investments. Based on site characterization data collected by RAMCON, Dongary's previous consultant, no floating product has ever been observed in any of the three ground water monitoring wells installed on the Dongary facility. However, on Tuesday June 14, 1994, EnviroClean inserted a bailer in each of the three monitoring wells. Ground water recovered from these wells contained no floating product nor was there a sheen of petroleum hydrocarbons, or any odor of petroleum hydrocarbons.

Please continue to inform EnviroClean and Dongary of findings at the adjacent property. Please call me at (510) 946-0455 if you have any questions.

Sincerely,

ERM ENVIROCLEAN-WEST, INC.

Robert A. Katin PE, REA
Project Manager

RAK/car/2270
cc: Mr. Donald W. Ringsby, Dongary Investments, Ltd.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

June 7, 1994
STID 3899 and 940

Port of Oakland
530 Water St.
Oakland CA 94607
Attn: Dan Schoenholz

Dongary Investments
PO Box 7240
Denver CO 80207
Attn: Don Ringsby

RE: ANR Freight, 2225-7th St., Oakland CA 94607 and
Building C-401, 2277-7th St., Oakland CA 94607

Dear Mr. Schoenholz and Mr. Ringsby,

I am in receipt of a letter from Mr. Schoenholz dated 5/31/94. This letter indicated that **up to approximately 6.88 feet of floating product was found in the newly installed monitoring wells at 2277-7th St.** These wells were installed by the Port subsequent to the removal and overexcavation associated with 4 USTs at Building C-401.

This letter is co-addressed to Dongary Investments because it appears that the groundwater plume from the ANR Freight site has not been fully defined. This plume appears to be heading in the direction of Building C-401. According to Plate 3 of the 3/18/93 "Soil and Groundwater Assessment" by Ramcon, BH-10 had 1800 ppm TPH-diesel at 5'bgs. The estimated limit of free product, as drawn on Plate 3, began at the diesel UST pit and headed northwest, then was depicted as ending abruptly at the USTs at Building C-401.

A remediation workplan prepared by ERM EnviroClean-West, dated 7/12/93, was received in this office on 7/14/93. It has not been implemented. However, I was informed by Mr. Schoenholz on 5/31/94 that the diesel UST pit was recently backfilled with soil provided by the Port. This was confirmed in a telephone conversation between myself and Bob Katin of ERM on 6/2/94. Mr. Katin also indicated that the contaminated stockpile is still onsite, pending lab results.

Therefore, you are required to remove the floating product in the wells immediately, and to submit documentation of this activity to this office within 10 days, or by June 17, 1994. In addition, you are required to monitor the wells for free product weekly, and to remove the free product as an interim remedial measure.

Legal authority comes from 23 CCR, Division 3, Chapter 16, Articles 5 and 11. **Please notify me at least 2 business days in advance of field activities.** This letter is being faxed to each of you today to ensure timeliness. If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Bob Katin, ERM EnviroClean-West, 1777 Botelho Dr., Suite 200, Walnut Creek CA 94596
Kevin Graves, RWQCB
Gil Jensen, Alameda County District Attorney's Office
Ed Howell/file

je

STATE OF CALIFORNIA

PETE WILSON, *Governor*

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, SUITE 500
OAKLAND, CA 94612
(510) 286-1255

93 OCT -8 PM 12:45

Mr. Robert Katin
Senior Associate
ERM Enviro-Clean-West
1777 Botelho Drive
Walnut Creek, CA 94596

October 7, 1993
File: (UST) 01 -0969

RE: Port of Oakland, Dongary Investment Facility, a.k.a ANR Freight, 2225 7th Street, Oakland

Dear Mr. Katin,

Regional Board staff have reviewed your July 12, 1993 proposal and your August 16, 1993 letter regarding enhanced bioremediation of petroleum hydrocarbon impacted soils and groundwater for the above UST site. It is my understanding that the Alameda County Department of Environmental Health LOP staff have requested our review and concurrence on this remediation alternative due to the discharge of approximately 900 cubic yards of polluted soils back into the UST excavation. **Board staff have no objection to this discharge or proposal provided that the following remedial goals for soils and groundwater are met:**

Soil: Determined by leachate **≤ 200 ppb** as TPH-diesel

Groundwater: **≤ 200 ppb** as TPH-diesel, MCLs for BTEX compounds

In the event discharged soils do not meet expected performance goals they will be removed to an appropriate landfill unless it can be demonstrated that pollutants left in soil have reached asymptotic levels and pose no significant threat to beneficial uses of surface and ground waters.

Leachability tests for remediated soils should approximate a conservative scenario for an uncapped site. WET, TCLP, Synthetic Rainwater, and modified versions of these tests are typically used to approximate site conditions for the potential leachabilty of pollutants into groundwater. In your letter you mention that the site will be capped and therefore propose a modified version of TCLP utilizing site groundwater as a leachate media. As long term cap integrity and maintenance schedules have not been discussed a standard TCLP should be used.

Final characterization of bioremediated soils is important for determining the efficacy of your bioremediation, the variability of pollutant concentrations remaining in remediated soils, and most

he meant in gw

importantly demonstrating through leachability testing that final soil remedial goals have been met. Your August 16, 1993 letter states:

> **" When concentration levels of TPH-d plateaus to a relatively constant concentration (in soil), Enviro-Clean proposes to take ten soil samples in the contamination zone ... from a depth of 6 to 10 feet below ground surface. The samples will be composited and analyzed for TPH-d."**

Without a demonstration of the uniform distribution of pollutants and homogeneity of site soils **the proposed sampling method has problems both with possible dilution of composited samples and characterization (spatial variability within the remedial area) resulting in insufficient data to demonstrate attainment of** leachability goals.

In lieu of intensive discrete sampling a statistical random sampling method utilizing appropriate confidence intervals would be more beneficial (e.g. Federal Guidance Document SW-846, on Site Characterization). The goal of any sampling plan for this site should be to characterize remediated soils and demonstrate leachability based remedial goals on characterized samples. This can be achieved by using split soil samples for quantification and leachability.

If you have any questions regarding the contents of this letter please do not hesitate to contact Richard Hiett from my staff at (510)286-4359.

Sincerely,

Donald D. Dalke

Donald D. Dalke
Division Chief
Toxics Cleanup Division

cc: Ms. Jennifer Eberle, ACHD, 80 Swan Way, Suite 200, Oakland, CA 946212

PORT OF OAKLAND

93 OCT 13 PM 4:21

October 12, 1993

Eldon Yeutter
Dongary Investments
PO Box 7240
Denver, CO 80207

Dear Mr. Yeutter:

SUBJECT: UNDERGROUND STORAGE TANK REMOVAL AT 2225 7TH STREET, OAKLAND, CALIFORNIA

This letter is in regard to the underground storage tank (UST) removals conducted by Dongary Investments (Dongary) at 2225 7th St., Oakland.

The Port is very concerned that the excavation remains open, almost a year and a half after removal of the USTs. We are also concerned that the contaminated soils which were excavated are still stockpiled on site.

Please provide us with an update on your efforts to remediate the contamination and dispose of the excavated soils. Also, please provide us with any reports or workplans you or your consultants have generated subsequent to the March 18, 1993 Soil and Groundwater Site Assessment report prepared by Ramcon.

If you have any questions, feel free to contact me at (510) 272-1220 or Terry Surel at (510) 272-1219.

Sincerely,

Dan Schoenholz

Dan Schoenholz
Associate Environmental Scientist

cc: Michele Heffes
Terry Surel
Jennifer Eberle, ACHSA
Rich Hiett, RWQCB

pc/dsdongery2/wp51

530 Water Street ■ Jack London's Waterfront ■ P.O. Box 2064 ■ Oakland, California 94604-2064
Telephone (510) 272-1100 ■ Fax (510) 272-1172 ■ Cable address, PORTOFOAK, Oakland

10-12-93

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To Dan Schwenholz	From J. Eberle
Co.	Co.
Dept.	Phone #
Fax #	Fax #

ERM EnviroClean-West

1777 Botelho Drive
Suite 200
Walnut Creek, CA 94596
(510) 256-6468
(510) 946-9968 (Fax)

August 16, 1993

93 AUG 18 PM 3:43

Mr. Richard C. Hiett
Sanitary Engineering Associate
Regional Water Quality Control Board
2101 Webster Street
Suite 500
Oakland, California 94612

ERM

Subject: Submittal of Workplan Contingency for Dongary Investments facility in Oakland, California

Dear Mr. Hiett:

On behalf of Dongary Investments, Ltd. (Dongary), ERM EnviroClean-West, Inc. (EnviroClean) submitted a Workplan dated July 12, 1993, for a site remediation to be performed at the Dongary site located at 2225 7th Street in Oakland, CA. The proposed remediation method was in situ bioremediation. Alameda County Health Care Services Agency (County) sent a letter dated July 15, 1993 to Dongary to acknowledge the Workplan and ask four questions. A response date of August 15, 1993 was requested. To address the questions, a conference call was established on July 27, 1993 amongst Ms. Jennifer Eberle of the County, yourself with Regional Water Quality Control Board (RWQCB), and myself representing Dongary. At the request of RWQCB, this letter is being directed to RWQCB (copy to the County) and is in reply to the County letter dated July 15, 1993.

From that conference call, I understand that RWQCB will accept clean-up levels based on EnviroClean's anticipation that our remediation system can achieve clean-up levels of 1,000 mg/kg Total Petroleum Hydrocarbons as diesel (TPH-d) in the soil and 200 µg/L TPH-d in the ground water. We understand that in order for RWQCB to agree to place the excavated dirt in the tank pit, that a contingency plan must be established that addresses action to be taken if clean up goals are not met.

In situ bioremediation utilizes injection and circulation of nutrient rich, oxygenated ground water. EnviroClean anticipates analyzing the circulated ground water on a regular basis for TPH-d. When concentration levels of TPH-d plateaus to a relatively constant concentration, EnviroClean proposes to take ten soil samples (in the contamination zone) depicted in Drawing B-9152.00-02 (of the Workplan) from a depth of 6 to 10 feet below ground surface. The samples will be composited, and analyzed for TPH-d.

- If the soil is less than 1,000 mg/kg TPH-d and the water is less than 200 µg/L TPH-d, a letter will be submitted to RWQCB recommending that remediation is complete, and that the site closure be granted.

- If the soil is greater than 1,000 mg/kg TPH-d and the water is greater than 200 µg/L TPH-d, EnviroClean will continue operation of the remediation system.

- If the soil is greater than 1,000 mg/kg TPH-d and the water is less than 200 µg/L TPH-d, EnviroClean will conduct a modified Toxicity Characteristic Leaching Procedure [redacted] to determine if significant TPH-d contamination is leaching from the soil. Since the site has an asphalt cap, the likelihood of contaminant spreading by rainfall is minimal. Therefore, EnviroClean proposes to modify the TCLP test by using a composite ground water sample from the existing three monitoring wells as extraction fluid. If the extract contains Benzene, Toluene, Ethyl Benzene, or Xylene (BTEX) at a concentration less than or equal to Maximum Contaminant Levels (MCLs) established by the State of California (Benzene 1 µg/L, Toluene 1,000 µg/L, Ethyl Benzene 680 µg/L, Xylene 1,750 µg/L), a letter will be submitted to RWQCB recommending that remediation is complete, and that the site closure be granted. If concentrations exceeding the MCLs are found in the extract, then EnviroClean will continue operation of the remediation system.

what about TPHd? No MCL

- If the soil is less than 1,000 mg/kg TPH-d and the water is greater than 200 µg/L TPH-d, EnviroClean will conduct a modified TCLP test. If ground water and extract contain concentrations less than or equal to MCLs for BTEX, a letter will be submitted to RWQCB recommending that remediation is complete, and that the site closure be granted. If concentrations exceeding the MCLs for BTEX are found in the extract or the ground water, then EnviroClean will continue operation of the remediation system.

I appreciate the time you spent on the conference call, and look forward to commencing remediation at this site. Please call me at (510) 946-0455 if there is anything I can do to assist you.

Sincerely,

ERM ENVIROCLEAN-WEST, INC.

RQ Katin

Robert A. Katin, PE, REA
Senior Associate

RAK/9152

cc: Ms. Jennifer Eberle-Alameda County Health Agency
Mr. Donald W. Ringsby-Dongary Investments, LTD

22 JUL 93

From: Bob Kahn, ERM EnviroClean West phone (510) 946-0455/FAX x 9968

To: Jennifer Eberle, Alameda County Health phone (510) 271-4530/FAX 5694757

Rich Hiett, RWQCB phone (510) 286-4359/FAX x1380

Don Ringsby, Dongary Investments phone (303) 320-3960/FAX 355-2451

Subject: Conference Call to discuss Workplan dated 12JUL93

I have tried to set up a conference call to discuss the Workplan dated 12 JUL 93, and need your help. Is it possible to talk before 11Am on TUESDAY 27JUL93? I know that Rich & Jennifer suggested after 2PM on TUESDAY 27JUL, however that will not meet with Don's schedule.

If not, I have attached a schedule. I have broken each day into 4 columns (J= Jennifer, R= Rich, D= Don, B=Bob) and have diagonally lined out \ when I understand that you will not be available (with the horizontal line representing noon).

Could you please mark-up the attached calendar to diagonally line out when you are not available for a short (15-30 minute) conference call?

My phone number is (510) 946-0455 & my fax is (510) 946-9968. Currently Thursday 29JUL93 looks like the earliest time all 4 of us are available. If that is the best day, how about 9Am?

I await your reply.

Bob

July 1993

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

7-23-93

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To Bob Katim	From J. Eberle
Co.	Co.
Dept.	Phone #
Fax #	Fax #

Bob - Thurs. 7-29 at 9am is fine with me JE.

J R D B

11am

2pm

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

July 15, 1993
STID 940

Don Ringsby
Dongary Investments
PO Box 7240
Denver CO 80207

RE: ANR Freight
2225-7th St.
Oakland CA 94607

Dear Mr. Ringsby,

We are in receipt of a preliminary Workplan for the above referenced site, prepared by ERM EnviroClean-West, dated 7/12/93. We accept the concept of bioremediation for this site. However, there may be some misunderstandings generated from the 4/15/93 meeting between Bob Katin, Rich Hiett and myself which I want to identify.

1. The proposal to backfill the excavations with the contaminated stockpiled soil cannot be approved until human health and groundwater quality goals are established.

2. The deposition of contaminated soils falls under the RWQCB's purview, not the County.

3. We cannot concur with cleanup levels of 500-1,000 ppm TPHd for soil or 100-200 ppb TPHd for groundwater.

4. The County and the RWQCB understood that ERM would propose actual concentrations as cleanup goals for this site, based on the capabilities of the bioremediation system.

The County as well as the RWQCB is trying to expedite this project. To this end, we request a remediation workplan **within 30 days or by August 15, 1993.** If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Bob Katin, ERM-West, 1777 Botelho Dr., Suite 200, Walnut Creek CA 94596
Dan Schoenholz, Port of Oakland, 530 Water St., Oakland CA 94607
Ed Howell/file

je 940-F

August 1993

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	J R D B	J R D B	J R D B	J R D B	J R D B	
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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 5, 1993
STID 940

Rich Hiett
Regional Water Quality Control Board
2101 Webster St., Suite 500
Oakland CA 94612

RE: ANR Freight
2225-7th St.
Oakland CA 94607

Dear Mr. Hiett,

As you know, seven USTs were removed at the above referenced site in July 1992. Soil and groundwater were sampled and found to be contaminated. Floating diesel product was observed on the water table. Bioremediation is currently being proposed for this site by ERM-West, Inc. Their representatives have discussed the need for a Waste Discharge Requirements (WDR) permit.

The County has accepted this type of remediation for this site in concept, and request the RWQCB's timely review of the WDR permit application. Since this site has floating product, it is a high priority case for us.

Since I have been unable to reach you by phone, I ask that you circulate this letter to the appropriate person(s) at the RWQCB. If you have any questions, please contact me at 510-271-4530.

Sincerely,

[redacted]
Hazardous Materials Specialist

cc: Don Ringsby, Dongary Investments, PO Box 7240, Denver CO 80207
Bob Katin, ERM-West, 1777 Botelho Dr., Suite 200, Walnut Creek CA 94596
Dan Schoenholz, Port of Oakland, 530 Water St., Oakland CA 94607
[redacted]

je 940-E

ERM EnviroClean-West

1777 Botelho Drive
Suite 200
Walnut Creek, CA 94596
(510) 256-6468
(510) 946-9968 (Fax)

April 22, 1993

Mr. Richard C. Hiett
Sanitary Engineering Associate
Regional Water Quality Control Board
2101 Webster Street
Suite 500
Oakland, California 94612

ERM

Subject: Meeting of April 15, 1993 regarding Dongary Investments facility in Oakland, California

Dear Mr. Hiett:

On April 15, 1993, a meeting was conducted to discuss the Dongary Investments facility at 2225 7th Street in Oakland, California. Attendees included: yourself; Ms. Jennifer Eberle of Alameda County Health Agency; and myself and Mr. John Prall, RG, of ERM. I appreciate the opportunity to discuss with you, our proposed in-situ biological treatment project. As I mentioned, the site formerly contained underground diesel storage tanks and is located in the area of the Port of Oakland.

"Waste": anything that affects water chem

Based on our meeting and your voice mail message, I understand that you have discussed the site with your supervisor, and this type of bioremediation system, in general, will not require a full Waste Discharge Requirements (WDC) permit. Therefore, you will not have to go before the Board for a decision, and the permit can be processed by a waiver letter. I understand that you need to discuss backfilling the excavation with the contaminated soil with your Division Chief, however, you believe we will be granted authorization, provided we submit enough information in the WDR application.

we didn't say this!

Based on our meeting, I understand that clean-up standards will be established later, however soil clean-up levels of 500-1,000 ppm Total Petroleum Hydrocarbons as diesel (TPHd) in the soil are reasonable if soil contamination does not leach into the ground water; and ground water clean-up levels of 100-200 ppb TPHd are reasonable. I am pleased to hear, that based on Porter-Cologne regulations, clean-up will probably be required to numerical limits such as the ones listed above, or clean-up to a point of diminishing returns.

I understand that a letter from the Alameda County Health Agency recommending in-situ biological treatment to RWQCB should expedite this project. Based on Ms. Jennifer Eberle's comments, I anticipate that it is her intent to issue such a letter for this facility.

not recommend it

we ~~do~~ accept the concept + request the Bd's timely review.

We are conducting ground water modeling now, and will be performing a laboratory bench scale test to confirm that biodegradation is feasible in a reasonable period of time. As soon as both modeling and laboratory work are completed, we will submit a proposed workplan to the County.

Again, I appreciate the time you spent with us, and look forward to commencing remediation at this site. Please call me at (510) 946-0455 if there is anything I can do to assist you.

Sincerely,

ERM ENVIROCLEAN-WEST, INC.

RA Katin

Robert A. Katin, PE, REA
Senior Associate

RAK/9152

cc: Ms. Jennifer Eberle-Alameda County Health Agency
Mr. Donald W. Ringsby-Dongary Investments, LTD

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

March 24, 1993
STID 940

Don Ringsby
Dongary Investments
Po Box 7240
Denver CO 80207

RE: ANR Freight
2225-7th St.
Oakland CA 94607

Dear Mr. Ringsby,

I have conducted a cursory, in-house file search for nearby sites. There is a box-sized file for the Naval Supply Center. It appears that some USTs were removed from a portion of this site in proximity to your site. However, it does not appear that monitoring wells have yet been installed. I spoke with the Hazardous Materials Specialist for that site, who informed me that it is unknown whether any monitoring wells exist in proximity to your site.

There are two Southern Pacific sites nearby: 1912-7th St. and 721 Cedar St. There is only one monitoring well at each of these sites. Therefore, groundwater flow direction is uncertain. These sites are marked on the attached map.

There are two sites within the Oakland Army Base: site 15 and site F. There has been a consistent groundwater flow direction at site 15 of WNW. Site F has a groundwater flow direction which fluctuates from NE to SE. These sites are also marked on the attached map.

Sealand Services Inc., at 1425 Maritime St., has four monitoring wells (installed 1/28/93). The groundwater flow direction was to the west, but the site is probably tidally influenced and the hydraulic gradient may change with tidal variations and seasonal fluctuations, according to their consultant. See the attached map for location.

The most significant information regards the Former Impoundment Area in the West Oakland Yard belonging to Southern Pacific (see starred location on attached map). The shallow groundwater zone had a NNW flow direction from November 1990 to December 1991. The deeper groundwater zone had a NNW flow direction between October and December 1991. Purgeable halocarbons have been detected in both zones, according to their consultant.

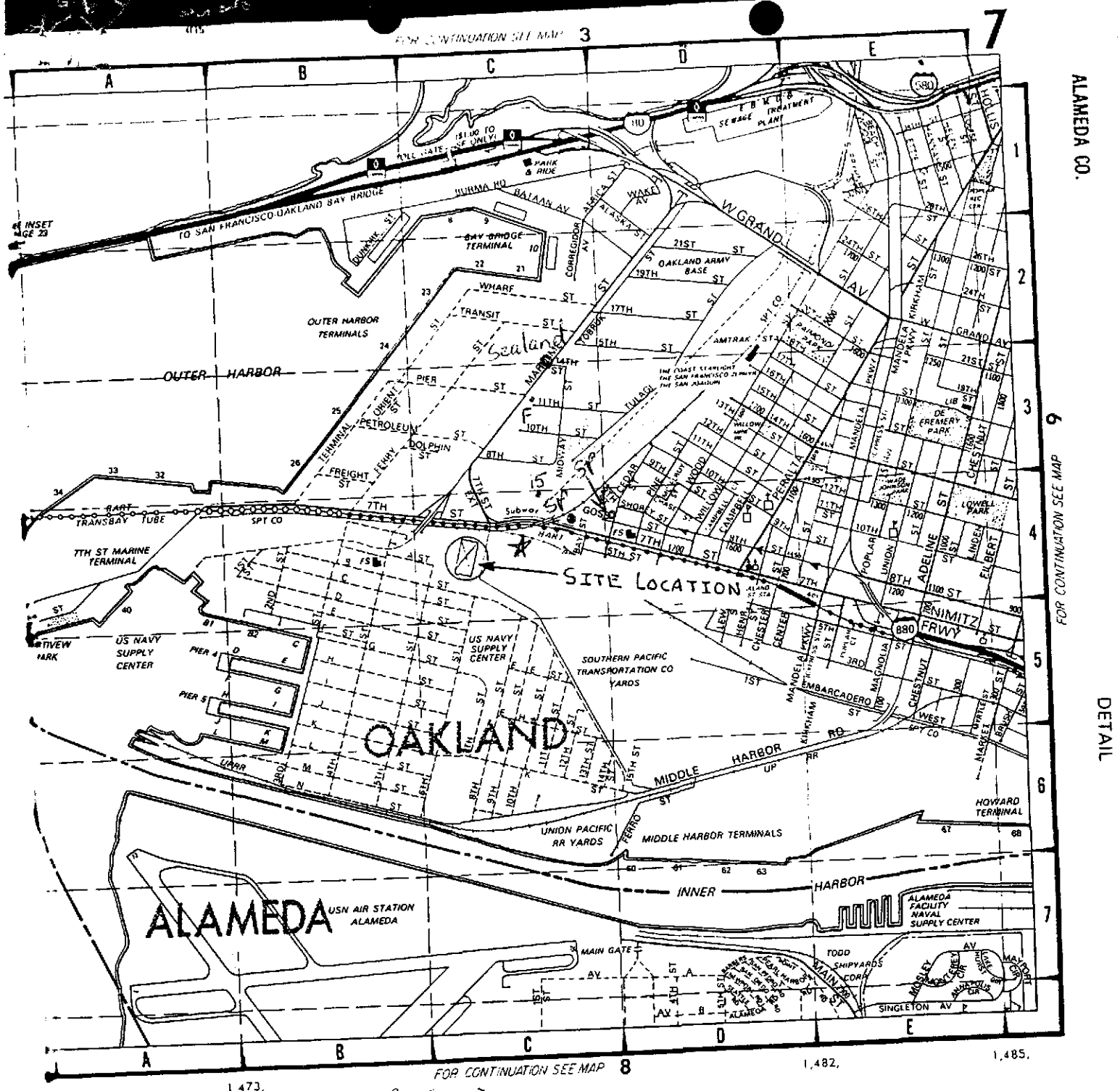
I hope this information helps. If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Bob Katin, ERM-West, Inc. Suite 260, 1777 Botelho Dr.,
Walnut Creek CA 94596-5042
Rich Hiett, RWQCB
~~Ed Howell~~/File

je 940-E



SP = Southern Pacific
15 = site 15
F = site F
☆ = former Impoundment Area (Southern Pacific)

GENERAL LOCATION MAP	
DONGARY INVESTMENTS- OAKLAND 2225 7th Street Oakland, CA. 94607	
RAMCON Job #467004	Date: 03-18-93
Scale: 1" = 2,200 feet	Plate 1

DONGARY INVESTMENTS, LTD.

EXECUTIVE OFFICES
P.O. Box 7240
Denver, Colorado 80207
303-320-3960

(303) 355-2451 fax

940

March 24, 1993

Jennifer Eberle
Alameda County Health Agency
80 Swan Way Room 350
Oakland CA 94621

Dear Ms. Eberle,

Thank you very much for taking the time to meet with me and my consultants Bob Katin and Bern Baumgartner.

I appreciate the open minded attitude displayed by you and Susan Hugo towards the innovative approach presented by Bob Katin of E.R.M.

The success he achieved on the very similar project in Watsonville, California for DuPont and other bioremediation projects which he has completed were very influential in this company being selected to do our remediation project.

There are several things which I like about E.R.M.'s approach. One of them is the fact that they have achieved closure in remarkably short periods of time. The Watsonville project only took one year. Other bidders projected 5 to 10 years but their technology was entirely different. The fact that everything is underground and my tenants will not be disrupted is critical for me to be able to afford this remediation project. Oakland is my company's most important source of income and therefore this fits our needs. Bob's plan to put the soil which is presently stored on site, back into the hole and then clean up the soil and water simultaneously is certainly the most cost effective approach presented by the various bidders.

I'm hopeful that your meeting with Rich Hiett of the RWQCB went well and that he is as receptive as you and Susan.

As I mentioned to you in our meeting, I'm anxious to get this site cleaned up as soon as possible. Your cooperation along those lines is greatly appreciated.

Yours truly,

Donald W. Ringsby
President

DWR/ms

cc: Robert Katin, E.R.M.
Omar Omar, Coastal Remediation
Walt Hwozdyk, ANR Freight

RWQCB

Mr. Tim Dolan
IT Corporation
4585 Pacheco Blvd.
Martinez, CA 94553

March 19, 1993

Attn: Sydney Mills

Dear Mr. Dolan:

SUBJECT: APPLICATION FOR WASTE DISCHARGE REQUIREMENTS

The discharge of extracted and treated groundwater from a groundwater pollution cleanup operation is regulated by this office pursuant to the California Water Code commencing with Section 13260.

One cannot reinfiltrate treated groundwater, add nutrients for enhanced in-situ bioremediation or leave contaminated soil in place without first obtaining a permit for Waste Discharge Requirements (WDRs) from this office. The application for such a permit is called a Report of Waste Discharge (ROWD). If the ROWD is accepted and a permit is issued by the Board the responsible party would have to comply with Chapter 15 of the California Code of Regulations to the maximum extent feasible.

The Report of Waste Discharge must include the following items and information (if this information has been previously submitted as part of a feasibility study or remediation investigation it may be referenced. Please include the page numbers and the name and date of the study/report being referenced):

1. In addition to the application fee $1000 an annual fee will be assessed in accordance with the type of discharge proposed. Enclosed is a fee schedule for the different programs.

2. A description of the general background of this site and the objective of the remediation system (i.e. containment, remediation)

3. The results of a hydrogeologic assessment including the following elements:

a) The geology of the site (sand lenses, fractures, etc.) including a geologic map and cross sections. The cross sections should show the lithology, soil structure and include boring logs,and well construction details where appropriate.

b) The aquifer properties, including pump tests and other supporting data. The depth to groundwater, its seasonal fluctuation, aquifer thickness, groundwater gradient, and possible vertical components.

c) What water bodies are hydrogeologically connected to the site, and what are the existing and potential beneficial uses? What are the potential impacts to the beneficial uses of groundwater and or surface waters should contaminants migrate to these waters?

d) Other site features, including the local topography and estimated surface infiltration rate; average annual precipitation; Is the site located within a 25 year floodplain? Are there any wells located within a

1/2 mile radius of the site and what are they used for?

4. The results of a contaminant assessment, including the following:

a) Is there free product or a sheen floating on the groundwater? Has there ever been any free product detected at the site? What are the existing concentrations of waste constituents dissolved in the groundwater at the site?

b) Site maps to scale showing the full extent of the groundwater pollution zone. Supporting laboratory data on groundwater samples must be included.

c) Site maps showing the full vertical and horizontal extent of the soil pollution zone(s). If a full 3-dimensional extent cannot be determined, the responsible party must explain why. Include signed laboratory data sheets and boring logs.

d) The results of chemical analysis of the untreated groundwater (influent) and the projected maximum concentrations in the effluent, for the following constituents:

i. EPA priority pollutant elements (See: Enclosure A)

ii. Those listed in Table #2 for the applicable type of hydrocarbon in groundwater. For example, if the groundwater is polluted by leaded gasoline, the minimum verification analyses for groundwater would include testing for total petroleum hydrocarbons as gasoline, benzene, toluene, total xylenes, total lead, and ethylene dibromide.

iii. Volatile organics using method 624 or 8240 (Purge and Trap by GC/MS). All priority pollutants shall be quantified.

iv. Base/neutral/acid and pesticide compounds using EPA method 625 (Extraction GC/MS).

v. EPA Method 8270.

Analyses shall be performed according to the appropriate EPA methods by a certified laboratory.

5. A description of the proposed extraction-treatment-discharge/reinfiltration system, including the following:

a) Site map to scale showing the location of the existing /proposed monitoring wells, extraction wells, treatment system, and reinfiltration gallery(s)/pond(s) (include the latitude and longitude of the reinfiltration gallery/pond). Where applicable, the configuration of the system must be designed with the aim of capturing all of the waste constituents in a "closed loop" system, minimizing the potential for waste constituents to spread.

b) Dimensions and construction details for the reinfiltration gallery/pond. If the depth of the gallery/pond exceeds the largest surface dimension, then the system falls under the United States Environmental Protection Agency regulations and the responsible party is required to comply with the Underground injection Control Program (40 CFR Part 144).

c) The maximum flow rate and the average flow rate of the proposed discharge in gallons per day and the basis for these estimates.

d) A detailed description of the proposed treatment system, including a requirement-by requirement analysis, based on accepted engineering practice, of how the process and physical design of the treatment facility

will ensure compliance with discharge limits which will be imposed by this Board (non-detect for PCBs, TPHd, BTEX etc.), a description of each of the unit operations employed in the treatment of the groundwater, schematic of the treatment system, design criteria, and specific calculations (including carbon breakthrough time).

e) An operation and Maintenance (O&M) Manual which include the following: operator staffing and training requirements, the inspection and maintenance schedule, a description of the safeguards to assure that, should there be reduction, loss, or failure of electric power, the terms and conditions of the WDR permit shall be complied with , and a description of the preventative (failsafe) and contingency (cleanup) plans for controlling accidental discharges, and for minimizing the effect of such events. These plans shall identify the possible sources of accidental loss, untreated or partially treated waste bypass, and polluted drainage. Loading and storage areas, power outage, waste treatment unit outrage, and failure of process equipment, tanks and pipes
shall be considered.

f) A discussion of the potential, temporal, administrative, and physical constraints of the operation of the treatment and the reinfiltration system.

g) Will anything be added to the groundwater prior to discharge? (e.g., nitrate, bacteria, peroxide, anti-scaling compounds, etc.).What will be their concentrations in the proposed discharge? What are their transformation and breakdown products and how would they effect the groundwater with respect to its potential use as a drinking water source and for any other potential beneficial uses? Will any potential reactions occur in which precipitates may form and potentially impede groundwater flow?

6. A proposed monitoring strategy designed to detect whether any of the waste constituents in the affected groundwater contamination zone are migrating or being pushed away. Groundwater sampling and analyses will be required on a quarterly basis at a minimum, and more frequently during critical stages of system operation. The groundwater monitoring proposal should include the following items as a minimum:

a) a site map to scale showing the locations of existing and or proposed monitoring wells, and their construction details; in addition to downgradient wells, monitoring wells located up and cross -gradient of the zone of contamination in the vicinity of the discharge pond/gallery, and appropriately placed in relation to any possible mounding effects are required;

b) the constituents for which the groundwater would be analyzed (e.g., BTEX, PCBs, TPHd, etc.) Analytical methods and detection levels should be included. How would this data be interpreted? That is, if the groundwater in a given monitoring well showed a decrease in contaminant concentration, for example would this mean is the plume being cleaned up or would it mean the plume is simply dispersing?

c) A corrective action plan describing the actions that wold be taken in the event that monitoring data suggested exceedence of any effluent limits imposed by this Board or that the contaminants were spreading. How quickly after the detection could the corrective action program be implemented?

7. A discussion of the quality of the proposed receiving waters. Is the proposed receiving waters a recharge zone, a drinking water source. etc.

8. A discussion of plans for the prevention of run-on, interception and diversion of runoff, and prevention of infiltration and runoff from contaminated soils stored on-site, if the discharge is associated with a groundwater remediation project and soils containing petroleum products or other pollutants will be

maintained on site.

9. Water balance calculations for the wettest season in ten years and the operational procedures to be followed to prevent overflow or discharge to surface waters from the receiving pond. Surface runoff and other contributing sources that enter the receiving pond must be included in the computations. Please notre that the Regional Board will require a minimum of three feet of freeboard to prevent the threat of overflow.

10. The results of a leachability study to determine the leachability of petroleum hydrocarbons and PCBs from soil to groundwater and the amount of retardation of these chemicals in the soil.

11. If the RP propose to leave contaminated soil in place, the RP must demonstrate that it is infeasible to remediate/remove the contaminated soil. This demonstration should include the following items as a minimum:

a) A full description of the relevant technical/economic factors that preclude the RP from restoring the soil to its previously uncontaminated state by treatment and/or excavation.

b) A description of the actions that the RP has taken, or proposes to take, in order to co,ply with Subsection (d) of Section 2511 of Chapter 15 of Title 23 of the California Code of Regulations, which provides that remedial actions intended to contain the waste constituents at the place of the release shall implement the applicable provisions of Chapter 15 to the extent feasible. To determine which provisions of Chapter 165 are applicable, it will first be necessary for the RP to determine the classification of the waste existing at the site in accordance with Article 2 of Chapter 15.

c) An evaluation should be made of the potential human and environmental health hazards posed by the residual soil contamination at the site. This risk assessment should include the following items:

i. Contaminant toxicity as a function of toxicity.

ii. The physical and chemical character of the contaminants(s), i.e./ physical state, stability, breakdown products, half-life, density, solubility, mobility, reactivity, biodegradability, etc.

iii. Present and future usage of the site and surrounding areas.

iv. Integrity of the contamination containment system, if any.

v. Possible routes of contaminant exposure

12. Any additional information necessary to show that the potential and existing beneficial uses of the receiving water (surface and/or groundwater) will not be adversely impacted by the proposed discharge.

If the proposal is to include discharge by spray irrigation, the proposed application rate in gallons per square foot per day must be specified. How many days per week would spray irrigation occur? (there can be no runoff to any surface water body or storm drain, and no discharge during any precipitation events.

Since the application will contain engineering or geological information, interpretations or opinions, as specified by the Business and Professions Code, it must be stamped by an appropriately registered professional.

The attached list of items is intended to serve for any of the above types of discharge of waste to land. I have included provisions necessary for an infiltration system, a bioremediation system, or leaving waste in place. WDRs are

very staff intensive and most often it is preferable to treat and discharge groundwater to a surface water body under our general NPDES permit for petroleum fuels cleanup rather than issuance of a WDR for an injection well or infiltration gallery. Staff are currently working on a general permit to cover ex-situ bioremediation projects. In-situ bioremediation projects will still be handled on a case by case site specific basis.

In the interim and contingent upon staff resources and caseload, your application will be processed in accordance with its priority relative to other cases. After processing, one of the following outcomes may result:

A. Additional information and or work will be required to complete the application for further processing;

B. The permit application will be rejected and an alternate plan will need to be proposed;

C. A permit will be issued by the Regional Board;

D. Waste Discharge Requirements will be waived pursuant to Section 2511 of Chapter 15, and groundwater monitoring will be required.

If you have any questions regarding the applicability of any of the aforementioned items, or would like to discuss alternatives that might expedite cleanup at your sites please do not hesitate to call me at (510) 286-4359.

Sincerely,

RICH HIETT
Water Resources Control Engineer

Enclosures: ROWD Application form
Enclosure A (EPA Priority Pollutant Elements)
Table#2 (Recommended Minimum Verification Analysis for UST Leaks(
Annual Fee Schedule

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

February 23, 1993

STID 940

Don Ringsby
Dongary Investments
Po Box 7240
Denver CO 80207

RE: ANR Freight
2225-7th St.
Oakland CA 94607

Dear Mr. Ringsby,

This letter serves to document our telephone conversation today, regarding the above referenced site. I understand that you are in the process of obtaining proposals *from* various environmental consultants for the remediation of this site. I also understand that you must wait for the consultants to provide you with proposals. In an effort to speed up this process, we have agreed on a deadline for the remediation workplan of **March 23, 1993.**

I also spoke with Jaff Auchterlonie of Ramcon today. He indicated that he is in the process of writing a summary of the work which Ramcon has performed to date, and that this report should be to the County very soon. In order to ensure the timely receipt of this report, I also request that this report be received in this office no later than **March 23, 1993.**

I look forward to working with you in the future. If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Dan Schoenholz, Port of Oakland, 530 Water St., Oakland CA 94607
Jaff Auchterlonie, Ramcon, PO Box 1026, 3751 Commerce Dr., West Sacramento CA 94691
Rich Hiett, RWQCB
Ed Howell/File

je 940-D

RAMCON
Engineering & Environmental Contracting

P.O. Box 1026
3751 Commerce Drive
West Sacramento, CA 95691

Phone (916) 372-7535
Fax (916) 372-4209

December 2, 1992

Ms. Jennifer Eberle
Hazardous Materials Specialist
Alameda County Health Care Services Agency
Department of Environmental Health
80 Swan Way, Room 200
Oakland, CA. 94621

RE- SITE ASSESSMENT & FREE PRODUCT RECOVERY: **Dongary Investments-**
2225 7th Street
Oakland, CA. 94607
RAMCON Job #476002

Dear Ms. Eberle,

This letter serves to record a verbal agreement made on 12-2-92 with Jaff Auchterlonie and Mick Ramos of **RAMCON** and Ms. Jennifer Eberle of the Alameda County Health Care Services Agency, Department of Environmental Health (ACDEH). At the time of the discussionn the ACDEH required the removal free product from the open excavations at the subject, see attached letter. Our clients have requested that **RAMCON** be allowed to assess the extent of the diesel contamination at the site, prior to installing a system to remove the free product from the excavations. The rational for the request lies in determining the volume of product floating on the surface of the groundwater and then designing the proper system to recover the product. Our clients are ready to assess the site as outlined in **RAMCON,s** assessment work plan dated 11-13-92.

Based on your verbal approval of our clients request; **RAMCON** will initiate the site assessment as soon our boring and monitor well permits are approved. We expect to be start the soil borings by December 14th, 1992 and should have the borings and monitor wells in place by the 18th of December.

After review of the field and analytical data gathered from the site assessment, a system to recover the free product will be installed at the site. In addition, a work plan to remediate the soil and groundwater at the subject site will also be written and forwarded to your department.

I will keep you informed on the progress of our assessment work and if possible, we would like to have you visit the site during the assessment work. If you have any questions please call me at (916) 372-7535.

Sincerely,

Jaffrey S Auchterlonie
RAMCON- Project Geologist

file:\wp51\docs\jaff\476reg1

RAMCON
Engineering & Environmental Contracting
3751 Commerce Drive
West Sacramento, CA 95691

FAX # (916) 372-4209 **Phone #** (916) 372-7535

FAX COVER SHEET

DATE:	12-28-92
TO:	Ms Jennifer Eberle
COMPANY:	Alameda County, Department of Environmental Health
FAX NUMBER:	(501) 569-4757
FROM:	Mick Ramos
COMMENTS:	DONGARY INVESTMENTS: Oakland- Free Product Removal, *RAMCON Job #476003*

I have included copies of the site map showing the locations of the 16 soil borings. Three of the borings (BH13, BH15, BH16) were drilled to 15 feet and converted to monitor wells. 19 samples were analyzed for TPH as Diesel and Motor Oil and 11 samples were analyzed for BTEX and TPH as Gasoline. No BTEX or TPH as Gasoline was detected.

Bore holes (1,2,6,9,12,13,14,15 and 16) did not contain free product.
Bore holes (3,4,5,7,8,10, and 11) contained free product.
Bore holes (6,10, and 12) drilled though clay, gravel and sand all the other bore holes encountered well sorted sand from 4 to 10 feet.

If you have any questions please call.

Sincerely,

Mick Ramos

Total Number of Pages (Including Cover Sheet): 8

Document will not be followed up by: Mail___ FED X___ COURIER___

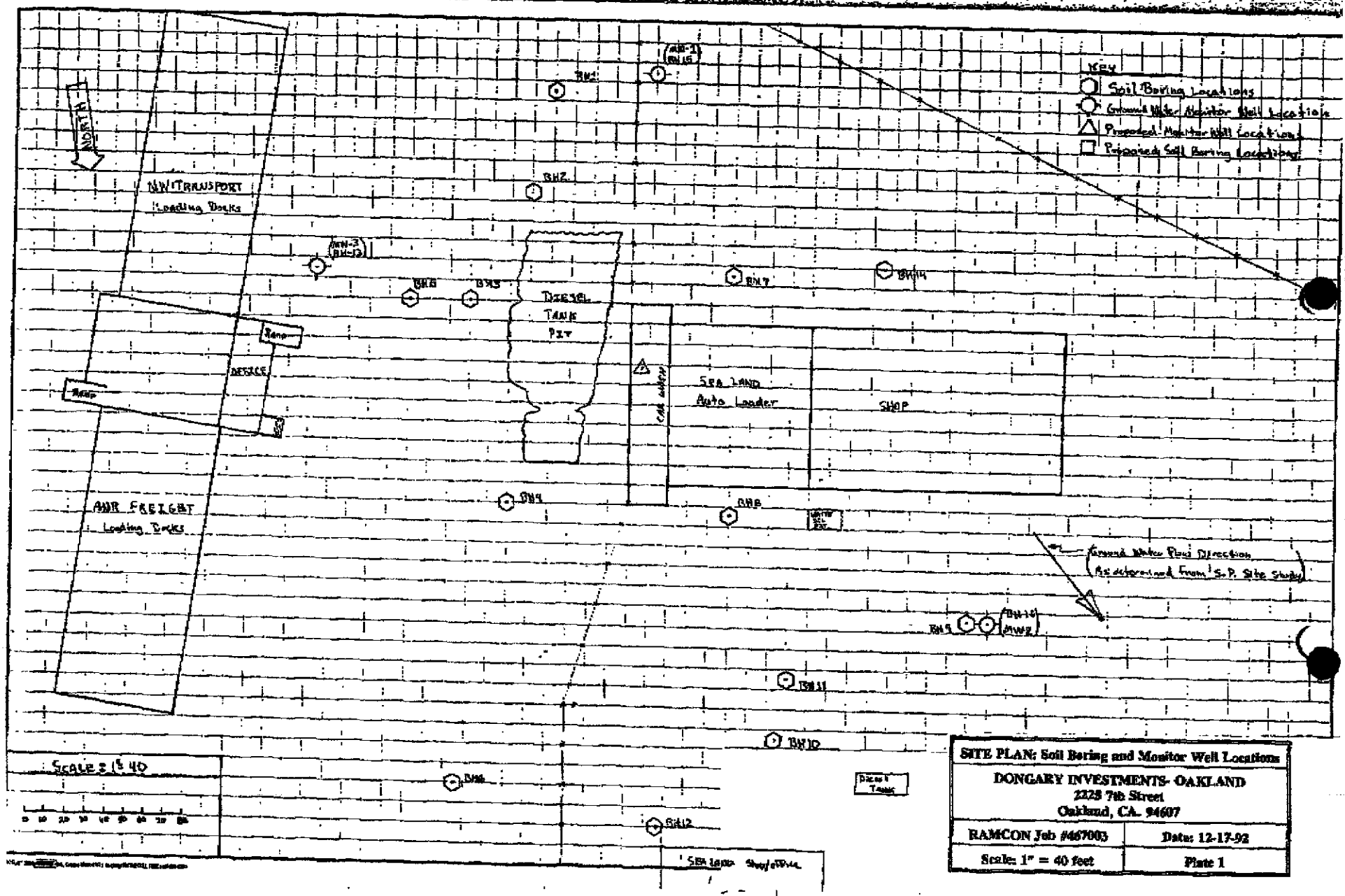
IF THE COPY IS ILLEGIBLE OR PAGES ARE MISSING PLEASE CALL (916) 372-7535

FILE:WP51\DOCS\476FAX2

TABLE 1: ANALYTICAL SUMMARY, DONGARY INVESTMENTS- Oakland					
16 Soil borings drilled to ten ft		WEST, Sample Logs #5555 & #5579			
Sample #	Location	TPH Diesel	TPH Motor Oil	BTEX	TPH Gasoline
BH1-5'	205' South & 40' East	42	77	--	--
BH2-5'	155' South & 50' East	ND	ND	--	--
BH2-8'		ND	ND	--	--
BH3-5'	100' South & 80' East	7,400	<200	--	--
BH4-4'	60' East	2,000	<100	--	--
BH4-6'		*	*	*	*
BH5-4'	100' South & 110' East	660	<50	--	--
BH5-6.5'		*	*	*	*
BH6-4'	140' North & 85' East	ND	ND	ND	ND
BH6-7'		ND	ND	ND	ND
BH7-4'	15' South & 50' West	310	18	--	--
BH7-7'		*	*	*	*
BH8-4'	5' North & 50' West	*	*	*	*
BH8-7'		*	*	*	*
BH9-4'	55' North & 170' West	ND	ND	ND	ND
BH9-6'		ND	53	ND	ND
BH10-5'	115' North & 75' West	1,800	ND	--	--
BH11-4'	85' North & 80' West	*	*	*	*
BH12-4'	160' North & 15' West	ND	ND	ND	ND
BH12-9'		ND	ND	ND	ND
BH13-4'	15' South & 137' East	ND	16	ND	ND
BH13-7'		ND	ND	ND	ND
BH14-4'	20' South & 125' West	ND	ND	ND	ND
BH14-7'		ND	ND	ND	ND
BH15-5'	115' South & 10' West	ND	ND	ND	ND
Reporting Limits- mg/kg or ppm		(10 to 200 mg/kg)		(.005)	(10 mg/kg)

Note: All locations measured perpendicular from the North-East corner of the Car Wash.
* = No Analyses Run, Strong Diesel Odor and Free Product Observed in Soil Sample.

file:\wp51\Docs\Jall476Data



SITE PLAN: Soil Boring and Monitor Well Locations	
DONGARY INVESTMENTS- OAKLAND 2225 7th Street Oakland, CA. 94607	
RAMCON Job #467003	Date: 12-17-92
Scale: 1" = 40 feet	Plate 1

KEY
- Soil Boring Locations
- Ground Water Monitor Well Location
- Proposed Monitor Well Locations
- Proposed Soil Boring Locations

NORTH

NW TRANSPORT
Loading Docks

ANR FREIGHT
Loading Docks

OFFICE

RAMP

RAMP

(MW-1) (BH-15) VOCs

BH1
42 (5')
77 (5')

BH2

(MW-3) (BH-13)
16 (4')

BH5
660 (4')

BH3
7400 (5')

DIESEL TANK PIT

BH7
310 (4')
18 (4')

ND
BH14

CAR WASH

SEA LAND
Auto Loader

SHOP

gw flow 1-15-93

BH4
2,000 (4')

BH8
FP in Acid

WASTE OIL PIT

(Ground Water Flow Direction
As determined from S.P. Site Study)

BH9
53 (6')

(BH-16) (MW2)

BH11
FP in Acid

BH10
1,800 (5')

Diesel TANK

TPH-d (ppm) + depth (ft.)
TPH-mo (ppm) + depth

BH6
~~FP in Acid~~
ND

ND BH12

SEA LAND Shop/office

SCALE 1" = 40
0 10 20 30 40 50 60 70 80

SITE PLAN: Soil Boring and Monitor Well Locations	
DONGARY INVESTMENTS- OAKLAND 2225 7th Street Oakland, CA. 94607	
RAMCON Job #467003	Date: 12-17-92
Scale: 1" = 40 feet	Plate 1

RAMCON
Engineering & Environmental Contracting
3751 Commerce Drive
West Sacramento, CA 95691

FAX # *(916) 372-4209* **Phone #** (916) 372-7535

FAX COVER SHEET

DATE:	12-23-92
TO:	Ms Jennifer Eberle
COMPANY:	Alameda County, Department of Environmental Health
FAX NUMBER:	(501) 569-4757 Phone: 271-4530
FROM:	Jaff Auchterlonie, RAMCON Project Geologist
COMMENTS:	DONGARY INVESTMENTS: Oakland- RAMCON Job #476003

I have included copies of the site map showing the location of the 16 soil bore holes. Three of the borings (BH13, BH15, and BH16) were converted to monitor wells. 19 soil samples were analyzed for TPH as Diesel & Motor Oil and 11 samples were analyzed for BTEX & TPH as Gasoline. No BTEX or TPH as Gasoline was detected. We failed to collect any water on three attempts with a hydropunch.

Referring to the analytical summary in Table 1, bore holes (1, 2, 6, 9, 12, 13, 14, 15, and 16) did not contain free product. Bore Holes (3, 4, 5, 7, 8, 10, and 11) contained free product. Bore holes (6,10, and 12) encountered a mixed strata consisting of interbedded clay, sandy clay, gravel, and sand beds. Bore Hole 12 was left open over night and NO ground water came into the hole. The lateral stratigraphic change from well sorted sand to mixed clay and gravel may act as barrier to ground water flow.

I will mail copies of the site map and table to you.

We are currently reviewing various plans to remove the free product and treat the ground water. We are also looking at the costs of a full excavation of the site, excluding the building.

If you have any questions please call.

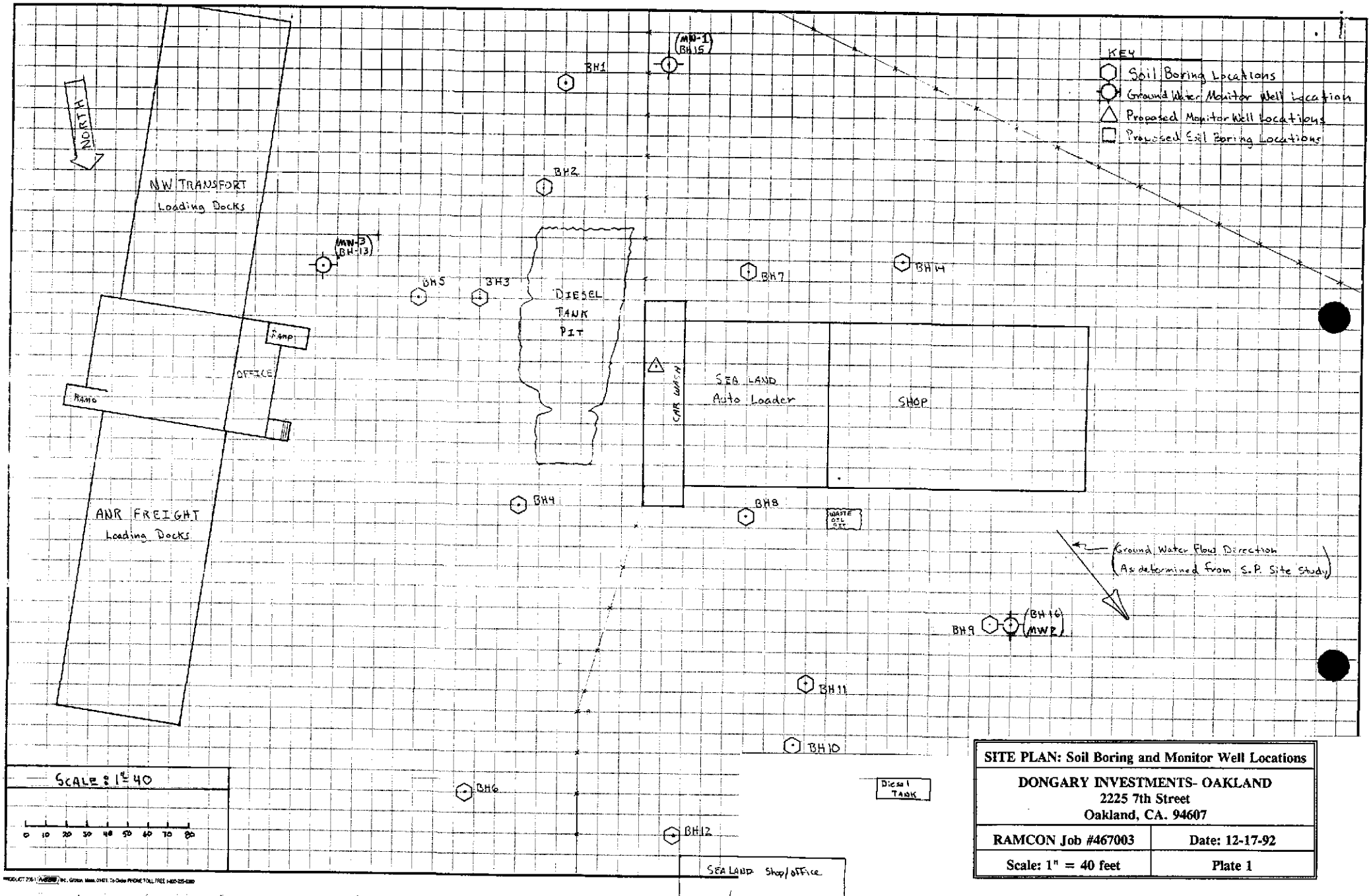
Sincerely,

Total Number of Pages (Including Cover Sheet): 3

Document will not be followed up by: Mail_X___ FED X___ COURIER___

IF THE COPY IS ILLEGIBLE OR PAGES ARE MISSING PLEASE CALL (916) 372-7535

FILE:WP51\DOC8\476FAX7



SITE PLAN: Soil Boring and Monitor Well Locations	
DONGARY INVESTMENTS- OAKLAND 2225 7th Street Oakland, CA. 94607	
RAMCON Job #467003	Date: 12-17-92
Scale: 1" = 40 feet	Plate 1

TABLE 1: ANALYTICAL SUMMARY, DONGARY INVESTMENTS- Oakland					
16 Soil borings drilled to ten ft		WEST, Sample Logs #5555 & #5579			
Sample #	Location	TPH Diesel	TPH Motor Oil	BTEX	TPH Gasoline
BH1-5'	205' South & 40' East	**42**	**77**	--	--
BH2-5'	155' South & 50' East	ND	ND	--	--
BH2-8'		ND	ND	--	--
BH3-5'	100' South & 80' East	**7,400**	<200	--	--
BH4-4'	60' East	**2,000**	<100	--	--
BH4-6'		*	*	*	*
BH5-4'	100' South & 110' East	**660**	<50	--	--
BH5-6.5'		*	*	*	*
BH6-4'	140' North & 85' East	ND	ND	ND	ND
BH6-7'		ND	ND	ND	ND
BH7-4'	15' South & 50' West	**310**	**18**	--	--
BH7-7'		*	*	*	*
BH8-4'	5' North & 50' West	*	*	*	*
BH8-7'		*	*	*	*
BH9-4'	55' North & 170' West	ND	ND	ND	ND
BH9-6'		ND	**53**	ND	ND
BH10-5'	115' North & 75' West	**1,800**	ND	--	--
BH11-4'	85' North & 80' West	*	*	*	*
BH12-4'	160' North & 15' West	ND	ND	ND	ND
BH12-9'		ND	ND	ND	ND
BH13-4'	15' South & 137' East	ND	**16**	ND	ND
BH13-7'		ND	ND	ND	ND
BH14-4'	20' South & 125' West	ND	ND	ND	ND
BH14-7'		ND	ND	ND	ND
BH15-5'	115' South & 10' West	ND	ND	ND	ND
Reporting Limits- mg/kg or ppm		(10 to 200 mg/kg)		(.005)	(10 mg/kg)

F.P.

Note: All locations measured perpendicular from the North-East corner of the Car Wash.

*** = No Analyses Run, Strong Diesel Odor and Free Product Observed in Soil Sample.**

file:wp51\Docs\Jaff\476Data

RAMCON
Engineering & Environmental Contracting
3751 Commerce Drive
West Sacramento, CA 95691

FAX # (916) 372-4209 **Phone # (916) 372-7535**

FAX COVER SHEET

DATE:	**11-12-92**
TO:	**Ms Jennifer Eberle**
COMPANY:	**Alameda County, Department of Environmental Health**
FAX NUMBER:	**(510) 569-4757**
FROM:	**Jaff Auchterlonie, RAMCON Project Geologist**
COMMENTS:	**DONGARY INVESTMENTS: Oakland- Free Product Removal, RAMCON Job #476003**

Refinery Services called and gave me the following volumes of water and product that they recived at their Patterson Facility:

Total Load= 4,817 gallons

Water= 4,335 gallons

Product= 482 gallons

The recovery ratio was 90% water and 10% product.

Please note: the volumes listed in the last FAX were based on field observations and were incorrect.

If you have any questions please call.

Sincerely,

Total Number of Pages (Including Cover Sheet): 1

Document will not be followed up by: Mail___ FED X___ COURIER___

IF THE COPY IS ILLEGIBLE OR PAGES ARE MISSING PLEASE CALL (916) 372-7535

FILE:WP51\DOCS\476FAX3

RAMCON
Engineering & Environmental Contracting
3751 Commerce Drive
West Sacramento, CA 95691

FAX # (916) 372-4209 **Phone # (916) 372-7535**

FAX COVER SHEET

DATE:	**11-12-92**
TO:	**Ms Jennifer Eberle**
COMPANY:	**Alameda County, Department of Environmental Health**
FAX NUMBER:	**(510) 569-4757**
FROM:	**Jaff Auchterlonie, RAMCON Project Geologist**
COMMENTS:	**DONGARY INVESTMENTS: Oakland- Free Product Removal, RAMCON Job #476003**

On 11-11-92 RAMCON personnel over saw the removal of free product from the excavations. Using floating booms to collect the product; a PRC vacuum truck pumped off a total of 5,000 gallons of free product/water from the excavations. Approximately 1,500 gallons of product was recovered from the excavations; the remaining 3,500 gallons was water. The fluid was transported under manifest to Refinery Services in Paterson CA for disposal.

Following the removal of the product from the excavations; free product was observed seeping back into the excavations. Prior to leaving the job site the water in the excavations were covered with a thin film of product. "absorbent pads"

Following the pumping job the booms were placed in two properly marked barrels and stored on-site. Details of the work and the manifests for the product will be included in RAMCON's site assessment work plan. The work plan should be on your desk sometime next week.

If you have any questions please call.

Sincerely,

Total Number of Pages (Including Cover Sheet): 1

Document will not be followed up by: Mail___ FED X___ COURIER___

IF THE COPY IS ILLEGIBLE OR PAGES ARE MISSING PLEASE CALL (916) 372-7535

FILE:WP51\DOCS\476FAX2

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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
271-4530

November 25, 1992

STID 940

Eldon Yeutter
Dongary Investments
Po Box 7240
Denver CO 80207

RE: ANR Freight
2225-7th St.
Oakland CA 94607

Post-It™ brand fax transmittal memo 7671 | # of pages ▸ 2

To Jaff Auchterloine	From Jennifer Eberle
Co.	Co. Alameda County
Dept.	Phone # 510-271-4530
Fax # 916-372-4209	Fax #

Dear Mr. Yeutter,

We have received documentation of free product removal via fax from Ramcon, dated 11/12/92. According to Ramcon, 482 gallons of product were removed from the groundwater in the open excavation on 11/11/92.

On 11/23/92, we received the "Soil and Groundwater Site Assessment Work Plan," prepared by Ramcon, dated 11/13/92. This plan involves the drilling of 10 soil borings and the installation of 4 groundwater monitoring wells. In addition, 10 water samples will be collected using a hydro-punch. Page 5 of the plan stipulates that "when the limits of the soil and groundwater contamination are defined; a work plan to. . .recover additional volumes of free product floating on the surface water. . .will be submitted."

We accept this work plan to define the extent of soil and groundwater contamination. However, the floating product is still our most immediate concern. Therefore, we require that removal of free product be performed as an interim remedial measure. Please commence free product removal **within 10 days** of this letter, or **by December 2, 1992.**

According to the California Code of Regulations (CCR), Title 23, Division 3, Chapter 16, Article 11, Section 2722 (b), "the responsible party shall take. . .interim remedial actions, as necessary, to abate or correct the actual or potential effects of an unauthorized release. Interim remedial actions can occur **concurrently** with any phase of corrective action. . . Interim remedial actions include. . .(1) **removal of free product.** Free product removal must comply with the applicable provisions of Section 2655 of Article 5."

In addition, Article 5, Section 2655 (a) states "The owner or operator shall remove free product to the **maximum extent practicable,** as determined by the local agency. . ." Section 2655 (b) states that "the owner or operator shall conduct free product removal in a manner that **minimizes the spread of contamination** into previously uncontaminated zones by using recovery and disposal techniques. . ."

If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Dan Schoenholz, Port of Oakland, 530 Water St., Oakland CA 94607
Michael Ramos, Ramcon, PO Box 1026, 3751 Commerce Dr., West Sacramento CA 94691
Rich Hiett, RWQCB
Ed Howell/File

je 940-C

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

November 25, 1992

STID 940

Eldon Yeutter
Dongary Investments
Po Box 7240
Denver CO 80207

RE: ANR Freight
2225-7th St.
Oakland CA 94607

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 2

To Jaff Auchterloine	From Jennifer Eberle
Co.	Co. Alameda County
Dept.	Phone # 510-271-4530
Fax # 916-372-4209	Fax #

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If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Dan Schoenholz, Port of Oakland, 530 Water St., Oakland CA 94607
Michael Ramos, Ramcon, PO Box 1026, 3751 Commerce Dr., West Sacramento CA 94691
Rich Hiett, RWQCB
Ed Howell/File

je 940-C

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

October 23, 1992

STID 940

Eldon Yeutter
Dongary Investments
Po Box 7240
Denver CO 80207

RE: ANR Freight
2225-7th St.
Oakland CA 94607

Dear Mr. Yeutter,

On 10/21/92, we received the "Tank Removal Work Summary" report dated 9/12/92, prepared by Ramcon. As you know, this report documents the activities regarding the removal of seven fuel underground storage tanks (usts) from the above referenced site on 7/27/92 and one waste oil tank on 8/18/92. **Free product** was observed floating on the surface of groundwater in the fuel tank excavations at a depth of approximately 8 feet below ground surface (bgs). Upon laboratory analysis, this free product was determined to be **pure diesel.** Diesel product was also observed floating in the waste oil tank excavation, located approximately 120 feet southwest of the fuel tank excavation. Soils sampled in the fuel tank excavation contained up to 100,000 ppm TPH as diesel.

Due to the significant amounts of contamination at this site, you are requested to submit a workplan for a subsurface investigation to delineate the extent of soil and groundwater contamination and/or a remediation workplan **within 45 days or by December 3, 1992.** Please include a schedule for implementation with the workplan. However, since there is free product in the rather large open excavation at this time, and since the site is in proximity to the Bay, you are requested to remove the free product as an interim remedial measure **within 15 days or by November 8, 1992.** Removal of free product may be accomplished by a vacuum truck ~~and~~ or a Baker tank. We are willing to work with you in a phased approach in regards to the remediation at this site.

The request for immediate free product removal and for a workplan is made pursuant to Article 5 of 23CCR, Section 2655 (a),(b),(c) and (e), and Article 11 of 23CCR, Section 2722 (b),(c),(d) and (e), and Section 2724. **Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.**

All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; b) the State WAter Resources Control Board LUFT Field Manual; and c) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted **under seal** of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. All reports and documents pertaining to this investigation should also be sent to:

Rich Hiett
San Francisco Bay Region
Regional Water Quality Control Board
2101 Webster St., Ste 500
Oakland CA 94612

If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Dan Schoenholz, Port of Oakland, 530 Water St., Oakland CA 94607
Michael Ramos, Ramcon, PO Box 1026, 3751 Commerce Dr., West Sacramento CA 94691
Rich Hiett, RWQCB
[redacted]

je 940-B

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

October 7, 1992

STID 940

Eldon Yeutter
Dongary Investments
Po Box 7240
Denver CO 80207

RE: ANR Freight
2225-7th St.
Oakland CA 94607

Dear Mr. Yeutter,

We are in receipt of preliminary laboratory results for soil sampling associated with the removal of seven diesel underground storage tanks (USTs) from the above referenced site on 7/27/92 by your contractor, Ramcon of West Sacramento. The laboratory, Western Environmental Science & Technology of Davis, reported concentrations as high as 44 parts per million (ppm) benzene and 100,000 ppm Total Petroleum Hydrocarbons (TPH) as diesel. These preliminary laboratory results were faxed to us from Ramcon on 8/14/92.

A 2,000-gallon waste oil UST was subsequently removed from the site on 8/18/92. Two soil samples and one water sample were collected from this excavation, according to our inspection report. We have not yet received any laboratory results for this tank removal.

According to the Closure Plan requirements, you are required to submit a Tank Closure Report within 60 days of tank removal. This report must include a narrative description of tank removal activities, including condition of USTs; a site map indicating the locations of USTs, sample points, at least two cross streets, and north directional arrow; signed copies of laboratory results clearly indicating **which sample corresponds to that on the site map**; chain of custody documents; and a narrative summary. The sixty day deadline from the date of the last UST removal would be 10/18/92. At this point, we request that you submit a Tank Closure Report **within 20 days** or **by October 27, 1992.** Assuming you were aware of the original sixty day requirement (since you signed the Closure Plan), this request allows you nine extra days to submit the Tank Closure Report.

In addition, it is apparent, from the exceedingly high concentrations of petroleum hydrocarbons in the diesel tank excavation noted in the preliminary laboratory results, that there is a severe problem at this site. Therefore, we request that you submit a workplan for a) the delineation and remediation of affected soils, and b) a groundwater investigation including at least three groundwater monitoring wells to determine whether groundwater has been effected **within 45 days or by November 22, 1992.**

All work should adhere to the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90. Reports and proposals must be submitted **under seal** of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. All reports and documents pertaining to this investigation should also be sent to:

Rich Hiett
San Francisco Bay Region
Regional Water Quality Control Board
2101 Webster St., Ste 500
Oakland CA 94612

If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Dan Schoenholz, Port of Oakland, 530 Water St., Oakland CA 94607
Michael Ramos, Ramcon, PO Box 1026, 3751 Commerce Dr., West Sacramento CA 94691
Rich Hiett, RWQCB
Ed Howell/File

je940-A

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

October 7, 1992

STID 940

Michele Heffes
Port of Oakland
530 WAter St.
Oakland CA 94604

RE: ANR Freight
2225-7th St.
Oakland CA 94607

Dear Ms. Heffes,

We are in receipt of your letter dated 9/24/92, where you state that the Port believes that it is not a responsible party to this site regarding the underground storage tanks. This agency has a contract with the State Water Resources Control Board (SWRCB) which defines "responsible party." The definition includes property owners. I have enclosed a copy of the SWRCB contract for your perusal.

I trust this will resolve this issue. If you have any questions, feel free to contact me at 510-271-4530.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Eldon Yeutter, Dongary Investments, PO Box 7240, Denver CO 80207
Rich Hiett, RWQCB
Ed Howell/File

je

PORT OF OAKLAND

Sender's Tel. No. (510) 272-1220
Sender's Fax. No. (510) 465-3755

September 24, 1992

Ms. Jennifer Eberle
Hazardous Materials Specialist
Alameda County Health Care Services Agency
80 Swan Way, Room 200
Oakland, CA 94621

Re: Notice of Requirement to Reimburse Dated September 1, 1992 (Underground Storage Tank Removal Site at 2225-7th Street, Oakland, California

Dear Ms. Eberle:

I received a copy of the Notice of Requirement to Reimburse (the "Notice") with an attached cover letter from your office concerning an underground storage tank removal project on Port of Oakland ("Port") -owned property at 2225 - 7th Street, Oakland.

The Notice indicates that pursuant to 42 U.S.C. §6991(b)(h)(6) and Cal. Health and Saf. Code §§25297.1 and 25360, the Port is a responsible party who must reimburse the State Water Resources Control Board ("SWRCB") not more than 150% of the total amount of site specific oversight costs actually incurred while overseeing the cleanup of the subject underground storage tank site.

In summary, the Port has determined that since it is neither the tank owner nor operator of the subject underground storage tanks it is not a responsible party as that term is used and defined in the applicable law who must reimburse the SWRCB for oversight costs. The Port requests that your office and the SWRCB remove the Port from the list of responsible parties for the subject site.

Title 42, U.S.C. §6991(b)(h)(6) provides in part:

> "(A) In general. Whenever costs have been incurred by the Administrator, or by a State pursuant to paragraph (7), for undertaking corrective action with respect to the release of petroleum from an underground storage tank, the owner or operator of such tank shall be liable to the Administrator or the State for such costs." (emphasis added)

Title 42 U.S.C. §6991(3) generally defines the term "owner" as one who owns an underground storage tank. Title 42 U.S.C. §6991(4) defines the term "operator" as "any person in control of, or having responsibility for, the daily operation of the underground storage tank."

Since the Port is neither the owner nor operator of the subject tanks, the Port is not liable to either the EPA Administrator or the State for their costs associated with the subject underground storage tank site.

Chapter 6.7 of Cal. Health and Saf. Code §25297.1(g)(2) provides:

> "A local agency which enters into an agreement pursuant to subdivision (b), shall notify the responsible party, for any site subject to a cleanup, abatement, or other action taken pursuant to the local oversight program established pursuant to this section, that the responsible party is liable for not more than 150 percent of the total amount of site-specific oversight costs actually incurred by the local agency." (emphasis added)

Chapter 6.7 of Cal. Health and Saf. Code does not define the term "responsible party." Thus it is unclear whether the term responsible party in Chapter 6.7 is limited to tank owners and operators, or whether the term includes land owners who neither own nor operate a tank. In the absence of this definition, the federal statute would provide guidance in the statutory interpretation. Since the federal program limits the parties liable to the EPA Administrator or State to tank owners and operators, and not to land owners who neither own nor operate the tank, it is likely that intent of the state legislation is similar.

Therefore, I request that the Port's name be deleted from the list of responsible parties for this site.

Very truly yours,

Michele Heffes

Michele Heffes
Legal Assistant

cc: Eldon Yeutter
Dongary Investments

DATE: 8/25/92

TO : Local Oversight Program

FROM: Don

SUBJ: Transfer of Elligible Oversight Case

Site name: ANR Freight

Address: 2225-7th St City Oakland Zip 94607 ?

Closure plan attached? (Y) N DepRef remaining $_____

DepRef Project #_____ STID #(if any) 940

Number of Tanks: 8 removed? (Y) N Date of removal 8/18/92 7-27-92 and

Leak Report filed? Y (N) Date of Discovery 8-14-92

Samples received? (Y) N Contamination:_____

Petroleum (Y) N Types: Avgas Jet leaded unleaded (Diesel) fuel oil (waste oil) kerosene solvents

Monitoring wells on site N Monitoring schedule? Y (N)

Briefly describe the following:

Preliminary Assessment ~

Remedial Action ~

Post Remedial Action Monitoring ~

Enforcement Action ~

Comments:

Up to 100,000 ppm TPH-d) seven diesel tanks'
" 44 ppm benz.) excavation

940

RP#2 - Dongary Investments - lease land for Port
~~Rick~~ Dick ANR subleased fm Dongary In.
now different people sublease land
Eldon Yeutter - POB 7240, Denver CO 80207

RP#1 landowner: Port of Oakland
lm 8-26-92 Dan Schoenholz
272-1220

or try Andrew Clark-Clough
272-1178

Dan Schoenholz: Env. Dept (11 people)
tenant, owned tanks
Dongary

RP#1 d n h any more responsblt - n #2.
Our letters reg'g further work are adrs to
the person who is doing the work

8-28 Dan S. phoned - wants us to name Dongary as #1
+ them (Port) as #2.
\$ tank owner was Dongary
" operator was ANR.
prop. is not secured
exc. is fenced
their tank records showed 10 USTs.

10-21-92 lm D. Schoenholz
272-1220

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Inspection Form

II,III

Site ID # ~~940~~ 940 Site Name DONGARY INVESTMENTS Today's Date 8/18/92

Site Address 2225 - 7TH ST

City OAKLAND Zip 94607 Phone _____

____ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:
____ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
____ II. Business Plans, Acute Hazardous Materials
____ III. Underground Tanks

CAC 000811480

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

II.A BUSINESS PLANS (Title 19)

___	1. Immediate Reporting	2703
___	2. Bus. Plan Stds.	25503(b)
___	3. RR Cars > 30 days	25503.7
___	4. Inventory Information	25504(a)
___	5. Inventory Complete	2730
___	6. Emergency Response	25504(b)
___	7. Training	25504(c)
___	8. Deficiency	25505(a)
___	9. Modification	25505(b)

II.B ACUTELY HAZ. MAT'LS

___	10. Registration Form Filed	25533(a)
___	11. Form Complete	25533(b)
___	12. RMPP Contents	25534(c)
___	13. Implement Sch. Req'd? (Y/N)	___
___	14. OffSite Conseq. Assess.	25524(c)
___	15. Probable Risk Assessment	25534(d)
___	16. Persons Responsible	25534(g)
___	17. Certification	25534(f)
___	18. Exemption Request? (Y/N)	25536(b)
___	19. Trade Secret Requested?	25538

III. UNDERGROUND TANKS (Title 23)

General

___	1. Permit Application	25284 (H&S)
___	2. Pipeline Leak Detection	25292 (H&S)
___	3. Records Maintenance	2712
___	4. Release Report	2651
___	5. Closure Plans	2670

Monitoring for Existing Tanks

___ 6. Method
1) Monthly Test
2) Daily Vadose
Semi-annual gndwater
One time soils
3) Daily Vadose
One time soils
Annual tank test
4) Monthly Gndwater
One time soils
5) Daily Inventory
Annual tank testing
Cont pipe leak det
Vadose/gndwater mon.
6) Daily Inventory
Annual tank testing
Cont pipe leak det
7) Weekly Tank Gauge
Annual tank tstng
8) Annual Tank Testing
Daily Inventory
9) Other _____

___	7. Precis Tank Test Date: _____	2643
___	8. Inventory Rec.	2644
___	9. Soil Testing.	2646
___	10. Ground Water.	2647

New Tanks

___	11. Monitor Plan	2632
___	12. Access. Secure	2634
___	13. Plans Submit Date: _____	2711
___	14. As Built Date: _____	2635

Rev 6/88

UNDERGROUND TANK REMOVAL

Comments:
OAKLAND FIRE: GOLDON GULLETT
REMOVAL BY RAMCON OF
WEST SACRAMENTO (916) 372-7535
MANIFEST 91688561 TO ERICKSON

REMOVED 2,000 GALLON SINGLE
WALLED UST CONTAINING
WASTE OIL. UST IS
TAR WRAPPED NO VISABLE HOLES
OR CORROSION.
WATER SAMPLE COLLECTED
DUE TO WATER IN EXCAVATION
WATER HAD VERY SMALL SHEEN.
2 SOIL SAMPLES COLLECTED
ONE FROM WEST + ONE FROM EAST END
ANALYSIS PER RWQCB TRI-REGIONAL
GUIDELINES: TPH (G) & (D) EPA 8010
8020, 8270 METALS Cd, Cr, Pb,
Ni, Zn PCB's & PNA's
SAMPLES COLLECTED BY (WESTERN ENVIR.
(916) 753-9500 - DAN LIPSHUTZ II, III

Contact: Rollo Stephens
Title: Operator
Signature: _____

Inspector: BRITT JOHNSON
Signature: BJ

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

II,III

Site ID # ____ Site Name ANR Freight Today's Date 1/27/92

Site Address 2225 7th St

City Oakland Zip 94606 Phone ____

____ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:
____ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
____ II. Business Plans, Acute Hazardous Materials
____ III. Underground Tanks

(703) 983-4373 Coastal Env. Roanoke Virginia 24016
Mustafa Kuran - rep ANR 707 5th St NE

• Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

II.A BUSINESS PLANS (Title 19)

___	1. Immediate Reporting	2703
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Annual tank testing
Cont pipe leak det
Vadose/gndwater mon.
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Cont pipe leak det
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Annual tank tsting
8) Annual Tank Testing
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Rev 6/88

manifest # 92081141(2) 92081090(1) 92081095(1), 91489006(1), 91488995(1) 90392253(1)

Comments: 1 ust removals all diesels

water heater # MAG 93 3-9177

Rollo Stevens - with Ramcon project mgr - (Dan Lipshutz sampler west)

(1) 8000 (5) 20,000 and (1) 10,000 gallon

tank #1 (8000) was tar wrapped it was difficult to inspect due to tar wrap. Black tar sampled free product / ground water was observed on water

Tank #2 approximately 6,500 had a small hole in the dispenser/vent end of the tank. Groundwater is present in all excavations. The water in excavation 2 appeared to have tar from wrapping floating also milky looking groundwater

tank #3 20,000 appeared to be intact no holes tar diesel smelling odors observed in pit

tank #4 20,000 no obvious holes - contain water

tank #5 20,000 " " " " "

All Samples in main tanks were sitting in groundwater were taken at the soil water interface

II, III

Contact: ____

Title: ____ Inspector: ____

Signature: ____ Signature: ____

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

II,III

Site ID # ____ Site Name ANR Freight Today's Date 7/27/92

Site Address 2225 7th St.

City Oakland Zip 94606 Phone ____

____ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:
____ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
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Comments:

Stockpiled soil volumes were calculated out of each of the three separate stockpiles eight samples were collected. One sample is to be analyzed for each 4 samples collected

3 water samples were collected
water collected in three separate areas ~~water sample~~
Tanks one and two formed their own pool W-1
tanks three, four and five formed another pool W-2
and tanks 6 and 7 formed another pool W-3

2 additional samples were collected at the east and west ends of the excavation at Rollo's request for the purpose soil contamination delineation
R-1 west end
R-2 east end

II, III

Contact: ____

Title: ____ Inspector: ____

Signature: ____ Signature: ____

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

II,III

Site ID # ____ Site Name ANR Freight Today's Date 2/22/92

Site Address 2225 7th St

City Oakland Zip 94606 Phone ____

____ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:
____ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
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___	15. Probable Risk Assessment	25534(d)
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Rev 6/88

Comments:

At the time of the ust removals (7) in the truck wash area several 55 gallon containers of motor oil and steam cleaner soap were noted

There is also some question as to where the drain flows to for the truck wash and whether there is an oil & water seperator. It appears as if there is.

need to check on generator / RMPP Status.

II, III

Contact: ____

Title: ____ Inspector: ____

Signature: ____ Signature: ____

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

II,III

Site ID # ____ Site Name _____ Today's Date ___/___/___

Site Address _____

City _____ Zip 94____ Phone _____

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Comments:

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II.B ACUTELY HAZ. MAT'LS

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Cont pipe leak det
Vadose/gndwater mon.
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Cont pipe leak det
7) Weekly Tank Gauge
Annual tank tstng
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___ 7. Precis Tank Test Date: _____	2643
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New Tanks

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___ 12. Access. Secure	2634
___ 13. Plans Submit Date: _____	2711
___ 14. As Built Date: _____	2635

Rev 6/88

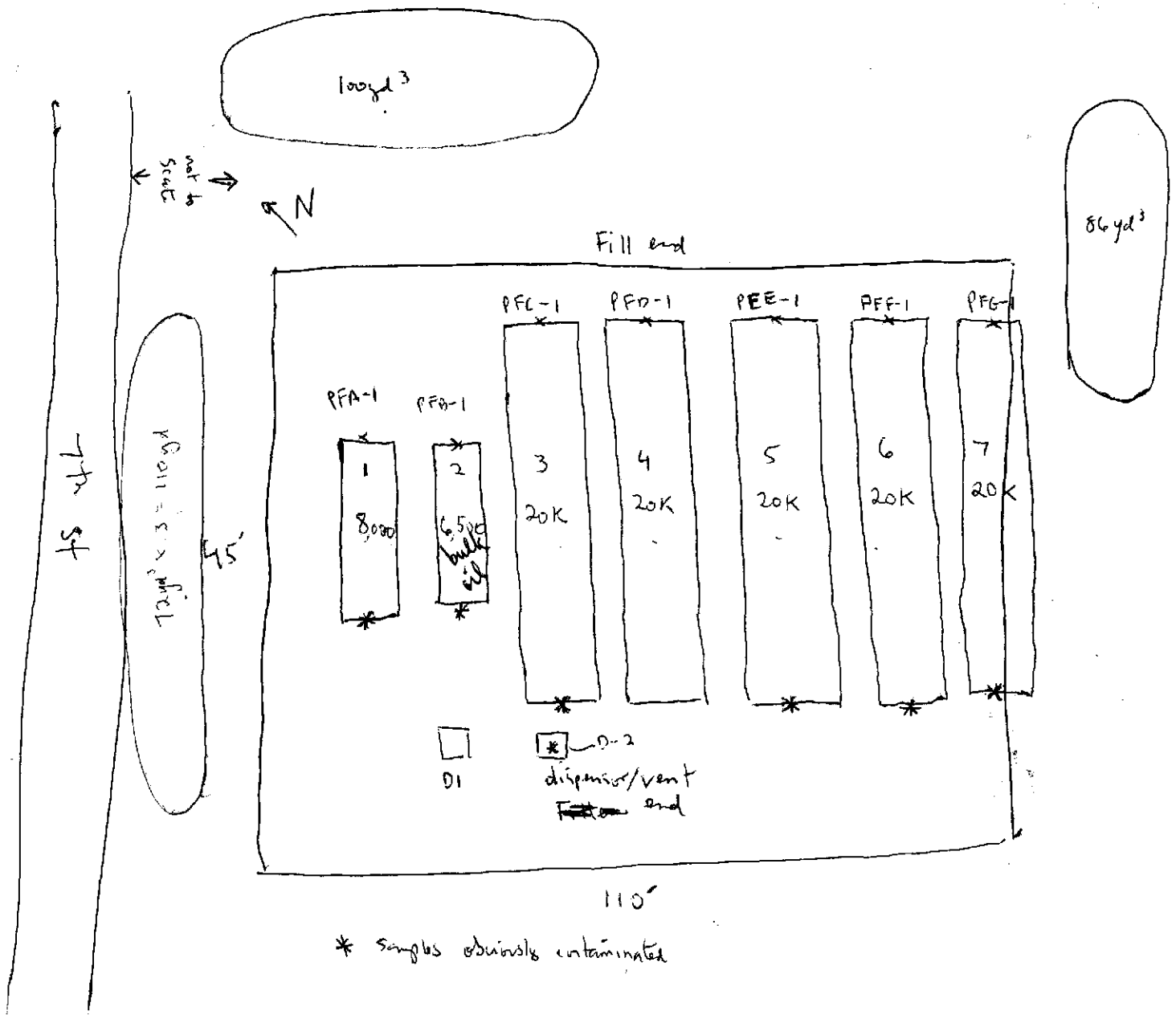
II, III

Contact: _____

Title: _____ Inspector: _____

Signature: _____ Signature: _____

PF = pit floor


100 yd³
not to scale
N
Fill end
86 yd³
PFC-1
PFD-1
PEE-1
PFF-1
PFG-1
PFA-1
PFB-1
1
8,000
2
6,500
bulk oil
3
20K
4
20K
5
20K
6
20K
7
20K
72 yd³ x 3 = 110 yd
45'
74'
D1
D-2
dispenser/vent
end
110'
* samples obviously contaminated

DATE: 2/26/92

TO : Local Oversight Program

FROM: Jeff

SUBJ: Transfer of Elligible Oversight Case

Site name: ANR Freight Systems

Address: 2225 W. 7th St. city Oakland Zip 94607

Closure plan attached? (Y) N DepRef remaining $ 159.50

DepRef Project # 890 STID #(if any) 940

Number of Tanks: 1 removed? (Y) N Date of removal 3/16/90

Samples received? (Y) N Contamination: YES

Petroleum (Y) N Types: Avgas Jet leaded (unleaded) Diesel
fuel oil waste oil kerosene solvents

Monitoring wells on site NONE Monitoring schedule? Y N discovery

LUFT category 1 2 3 * H S C A R W G O

Briefly describe the following:

Preliminary Assessment

Remedial Action NONE

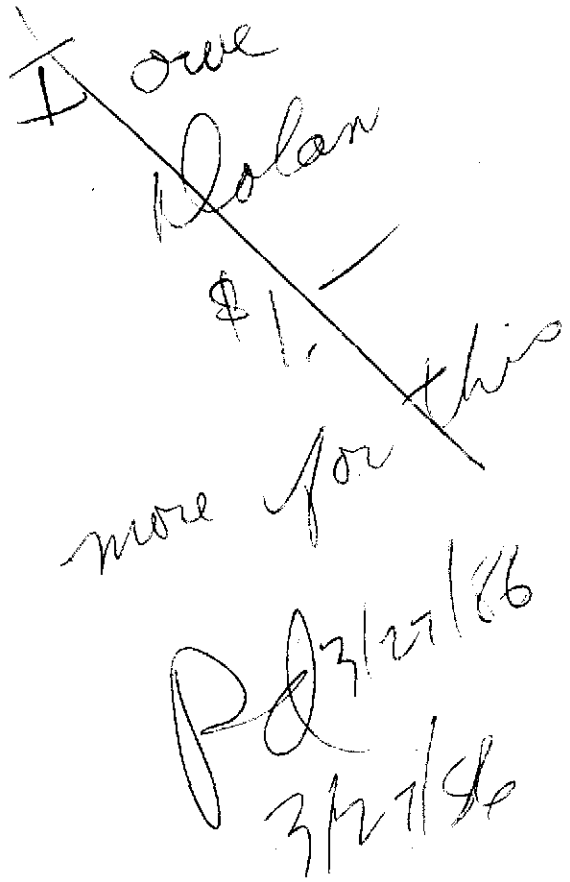
Post Remedial Action Monitoring

Enforcement Action

5/14/92 Benzene detected in GPO. H₂O at 3.18 ppm. OTHER BTEX ranged from 0.39 to 2.83 ppm in soil. Excavated Soil is piled on the site and contains from 3700 to 13,000 ppm diesel and 5280 ppm TPH.

THE last report is dated 4/6/90. Recommendations were made re: Installation of MW's And Grd. H₂O sampling, but there is no evidence to prove this type of work has be done. Also, what about the excavated soil at the site?

See p. 7-8



CHAPTER 9
ISSUES IN INTRODUCING AN INCENTIVE SYSTEM

9.1 MOTIVATION FOR PERFORMANCE IMPROVEMENT

9.1.1 Introduction

Every organizational unit has a potential for improving its performance through product and process design change, production cost reduction, and better resource utilization (equipment, material, manpower). The crucial issue is whether the people working for the organization are motivated enough to search for and implement these ideas which can improve the organization's performance.

Financial incentive is the motivational approach covered by this book. In order for this approach to be a valid one, it should be derived from a sound motivational theory. This section discusses the most important motivational models used to explain the level of human motivation with regard to improving performance and relates this to incentive systems.

9.1.2 Maslow - Hierarchy of needs

Maslow's hierarchy of needs [10] is one of the first motivational models. It states that needs are arranged in a hierarchy, with physiological and security needs at the bottom, social and esteem needs in the middle, and self-realization needs at the top.

Physiological needs correspond to primary needs such as food and sleep. Security needs relate to every day living such as keeping a good job and staying in school. Social needs correspond to needs for affection and affiliation with others. Esteem needs are the needs for power, status, and self-respect. And self-realization is the need for fully actualizing the individual's potential.

According to Maslow, the individual first drives to satisfy the lower-order needs before approaching the higher ones. Using this theory it can be stated that the compensation level is a

7/92

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
80 SWAN WAY, ROOM 200
OAKLAND, CA 94621
PHONE NO. 415/271-4320

+ Please see chemical analysis section additional test have been specified from initially listed
- Pipeline / dispenser samples to be performed one per twenty lineal feet
- Stockpile over burden samples to be collected (4 samples composited into one in the lab) one sample per twenty cubic yards of soil.

ACCEPTED
DEPARTMENT OF ENVIRONMENTAL HEALTH
470 - 27th Street, 3rd Floor
Oakland, CA 94612
Telephone (415) 874-7283

These plans have been reviewed and found to be acceptable and essentially meet the requirements of the local health laws. Changes to these plans required by the Department are to assure compliance with the health laws. The project proposed herein is not to begin until receipt of any required building permits from this Department.

One copy of these accepted plans must be available to all contractors and shall remain on the site during the removal.

Any change or alterations of these plans and specifications must be submitted to this Department for approval. Building Inspection Department cannot perform changes made the requirements of these and must be notified by this Department at least 48 hours prior to the following required inspections:

Removal of Tank and Piping
Sampling
Final Inspection

Issuance of a permit to operate is dependent on compliance with accepted plans and all applicable laws and regulations.

THERE IS A FINANCIAL PENALTY FOR NOT OBTAINING THESE PERMITS.

Lane M. Hirst

UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

1. Business Name ANR Freight
   Business Owner Dongary Investments
2. Site Address 2225 7th Street
   City Oakland Zip 94607 Phone 510)658-6300
3. Mailing Address P.O Box 7240
   City Denver Co. Zip 80207 Phone 303)320-3960
4. Land Owner Port of Oakland 94607
   Address 530 Water Street City, State Oakland Zip 94604-2064
5. EPA I.D. No. CAC000811480
6. Contractor Ramcon
   Address 3751 Commerce Drive
   City West Sacramento, CA 95691 Phone 916)372-7535
   License Type 51034 A/HAZ Fed. ID# 94-2721041
7. Consultant n/a
   Address
   City Phone

8. Contact Person for Investigation (Pongsary Investments)

Name Eldon Yeutter Title Executive V.P.

Phone (303) 320-3960

9. Total No. of Tanks at facility 8

10. Have permit applications for all tanks been submitted to this office? Yes [✓] No [ ]

11. State Registered Hazardous Waste Transporters/Facilities

a) Product/Waste Tranporter

Name Gibson Oil EPA I.D. No. CAD980883177

Address End of Commercial Drive

City Bakersfield State CA Zip 93308

b) Rinsate Transporter (tanks will be bone dry)

Name Refinery Services EPA I.D. No. _____

Address Recyclectron Oil

City Patterson State CA Zip 95363

c) Tank Transporter

Name Erickson, Inc EPA I.D. No. CAD009466392

Address 255 Parr Blvd

City Richmond State CA Zip 94801

d) Tank Disposal Site

Name Erickson, Inc EPA I.D. No. CAD009466392

Address 255 Parr Blvd

City Richmond State CA Zip 94801

e) Contaminated Soil Transporter

Name n/A at this time EPA I.D. No. _____

Address _____

City _____ State _____ Zip _____

12. Sample Collector

Name Troy Turpen

Company Western Environmental Science & Technology

Address 1046 Olive Drive, Suite 3

City Davis State CA Zip 95616 Phone (916) 753-9500

13. Sampling Information for each tank or area

Tank or Area		Material sampled	Location & Depth
Capacity	Historic Contents (past 5 years)		
2,000	W/O	Chlorinated Solvents	per your guidelines
10,000	Diesel	TPH, D	
10,000	Diesel	TPH, D	
20,000	Diesel	TPH, D	
20,000	Diesel	TPH, D	Soil
20,000	Diesel	TPH, D	
25,000	Diesel	TPH, D	
25,000	Diesel	TPH, D	

14. Have tanks or pipes leaked in the past? Yes [ ] No [✓]

If yes, describe. _____

15. NFPA methods used for rendering tank inert? Yes [✓] No [ ]

If yes, describe. Dry ICE (lots!) 15 lbs/ 1000 gal capacity

An explosion proof combustible gas meter shall be used to verify tank inertness.

16. Laboratories

Name Western Environmental Science & Technology

Address 1046 Olive Drive, Suite 3

City Davis State CA Zip 95616

State Certification No. 1346

17. Chemical Methods to be used for Analyzing Samples

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Number
Diesel	8020/8240 BTX-E 3550 - TPHd	TPH, Diesel
Waste Oil	5030 - TPHg 3550 TPHd 5520 Total Oil and Grease 8020/8240 B.T.X.+E. 8010/8240 Chlorinated Hydrocarbons ICAP or AA for Cd, Cr, Pb, Zn, Ni 8270 for PCB, PAP, PNA, Creosote,	Waste Oil

18. Submit Site Safety Plan

19. Workman's Compensation: Yes [✓] No [ ]

Copy of Certificate enclosed? Yes [✓] No [ ]

Name of Insurer Wright & Kimbrough (Republic Indemnity)

20. Plot Plan submitted? Yes [✓] No [ ]

21. Deposit enclosed? Yes [✓] No [ ]

22. Please forward to this office the following information within 60 days after receipt of sample results.

a) Chain of Custody Sheets

b) Original Signed Laboratory Reports

c) TSD to Generator copies of wastes shipped and received

d) Attachment A summarizing laboratory results

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true. I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Saftey and Health Administration) requirements concerning personnel and safety.

I will notify the Department of Environmental Health at least two (2) working days (48 hours) after approval of this closure plan in advance to schedule any required inspections. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

Signature of Contractor

Name (please type) Michael S. Ramos

Signature Michael S Ramos Pro

Date 6-30-92

Signature of Site Owner or Operator

Name (please type) Dongary Investments, Ltd.
Eldon C. Yeutter - Executive Vice President

Signature Eldon C. Yeutter - EXECUTIVE VICE PRESIDENT

Date 7-1-92

STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD

UNDERGROUND STORAGE TANK PERMIT APPLICATION - FORM A

COMPLETE THIS FORM FOR EACH FACILITY/SITE

MARK ONLY ONE ITEM: ☐ 1 NEW PERMIT ☐ 2 INTERIM PERMIT ☐ 3 RENEWAL PERMIT ☐ 4 AMENDED PERMIT ☐ 5 CHANGE OF INFORMATION ☑ 7 PERMANENTLY CLOSED SITE ☐ 6 TEMPORARY SITE CLOSURE

I. FACILITY/SITE INFORMATION & ADDRESS - (MUST BE COMPLETED)

DBA OR FACILITY NAME: ANR Freight
NAME OF OPERATOR:
ADDRESS: 2225 7th Street
NEAREST CROSS STREET: Maritime
PARCEL # (OPTIONAL):
CITY NAME: Oakland
STATE: CA
ZIP CODE: 94606
SITE PHONE # WITH AREA CODE: 510) 658 - 6300

✓ BOX TO INDICATE: ☐ CORPORATION ☐ INDIVIDUAL ☐ PARTNERSHIP ☐ LOCAL-AGENCY DISTRICTS ☐ COUNTY-AGENCY ☐ STATE-AGENCY ☐ FEDERAL-AGENCY

TYPE OF BUSINESS: ☐ 1 GAS STATION ☐ 2 DISTRIBUTOR ☐ 3 FARM ☐ 4 PROCESSOR ☐ 5 OTHER
☐ ✓ IF INDIAN RESERVATION OR TRUST LANDS
OF TANKS AT SITE:
E. P. A. I. D. # (optional): CAC000811480

EMERGENCY CONTACT PERSON (PRIMARY)
DAYS: NAME (LAST, FIRST): Deutter, Eldon
PHONE # WITH AREA CODE: (303) 320-3960
NIGHTS: NAME (LAST, FIRST):
PHONE # WITH AREA CODE:

EMERGENCY CONTACT PERSON (SECONDARY) - optional
DAYS: NAME (LAST, FIRST):
PHONE # WITH AREA CODE:
NIGHTS: NAME (LAST, FIRST):
PHONE # WITH AREA CODE:

II. PROPERTY OWNER INFORMATION - (MUST BE COMPLETED)

NAME: Domany Investments Limited
CARE OF ADDRESS INFORMATION
MAILING OR STREET ADDRESS: P.O Box 7240
✓ box to indicate: ☐ INDIVIDUAL ☐ LOCAL-AGENCY ☐ STATE-AGENCY ☐ CORPORATION ☐ PARTNERSHIP ☐ COUNTY-AGENCY ☐ FEDERAL-AGENCY
CITY NAME: Denver
STATE: Co
ZIP CODE: 80207
PHONE # WITH AREA CODE: 303) 320-3960

III. TANK OWNER INFORMATION - (MUST BE COMPLETED)

NAME OF OWNER: Domany Investments Limited
CARE OF ADDRESS INFORMATION
MAILING OR STREET ADDRESS: P.O Box 7240
✓ box to indicate: ☐ INDIVIDUAL ☐ LOCAL-AGENCY ☐ STATE-AGENCY ☐ CORPORATION ☐ PARTNERSHIP ☐ COUNTY-AGENCY ☐ FEDERAL-AGENCY
CITY NAME: Denver
STATE: Co
ZIP CODE: 80207
PHONE # WITH AREA CODE: 303) 320-3960

IV. BOARD OF EQUALIZATION UST STORAGE FEE ACCOUNT NUMBER - Call (916) 323-9555 if questions arise.

TY (TK) HQ 44-018631

V. PETROLEUM UST FINANCIAL RESPONSIBILITY - (MUST BE COMPLETED) – IDENTIFY THE METHOD(S) USED

✓ box to indicate: ☐ 1 SELF-INSURED ☐ 2 GUARANTEE ☐ 3 INSURANCE ☐ 4 SURETY BOND ☐ 5 LETTER OF CREDIT ☐ 6 EXEMPTION ☐ 99 OTHER

VI. LEGAL NOTIFICATION AND BILLING ADDRESS

Legal notification and billing will be sent to the tank owner unless box I or II is checked.

CHECK ONE BOX INDICATING WHICH ABOVE ADDRESS SHOULD BE USED FOR LEGAL NOTIFICATIONS AND BILLING: I. ☐ II. ☑ III. ☐

THIS FORM HAS BEEN COMPLETED UNDER PENALTY OF PERJURY, AND TO THE BEST OF MY KNOWLEDGE, IS TRUE AND CORRECT

APPLICANT'S NAME (PRINTED & SIGNATURE): Michael S Lamm
APPLICANT'S TITLE: owners/agent
DATE MONTH/DAY/YEAR: 6-30-92

LOCAL AGENCY USE ONLY

COUNTY #:
JURISDICTION #:
FACILITY #:
LOCATION CODE - *OPTIONAL*:
CENSUS TRACT # - *OPTIONAL*:
SUPVISOR - DISTRICT CODE - *OPTIONAL*:

THIS FORM MUST BE ACCOMPANIED BY AT LEAST (1) OR MORE PERMIT APPLICATION - FORM B, UNLESS THIS IS A CHANGE OF SITE INFORMATION ONLY.

FORM A (5-91) FOR0033A-5

Consultant for ANR

Mustafa Khan

Coastal Remediation Co

707 5th street NE

Roanoke, VA

24016

(800) 776-5733

wants to be on cc list for

ANR Freight

2225 7th St

94607

STATE OF CALIFORNIA
GEORGE DEUKMEJIAN, Governor

STATE WATER RESOURCES CONTROL BOARD
DIVISION OF LOANS AND GRANTS
2014 T STREET
P.O. BOX 944212
SACRAMENTO, CA 94244-2120
(916) 739-4436
(916) 739-2300(Fax)

SEP 28 1990

Ms. Deborah Moore
Tax and Licensing Specialist
ANR Freeport System, Inc.
Post Office Box 5070
Denver, CO 80217

Dear Ms. Moore:

UST PROGRAM FACILITY/SITE INFORMATION FOR PERMIT APPLICATION FORMS A AND B

This is in response to your letter of August 1, 1990 transmitting Forms A and B to reflect changes or corrections of your company's underground storage tanks.

Your letter is being forwarded to the following local implementing agency:

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

The County is the local agency responsible to implement the Underground Storage Tank program requirements in this area. If you have any questions, please call the County at (415) 271-4320 or me at (916) 739-4436.

David Holtry
Underground Storage Tank Engineering Unit

cc: Mr. Ed Howell, Alameda County, Oakland (with enclosure)

90 SEP 31 AM 11:06

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
30 Swan Way, Rm. 200
Oakland, CA 94621
(415)

4 April 1990

Dan McClanigan
SCS Engineers
6761 Sierra Court
Suite D
Dublin, CA 94568

Subject: Criterion for the Self-classification of Waste as articulated by the California Department of Health Services.

Dear Mr. McClanigan:

Enclosed please find a copy of a letter from Rick Brausch of State DOHS to Daniel Avera of San Diego County. This letter describes the process to be used in classifying hydrocarbon contaminated soil as hazardous. Your attention is directed to Page 5 where the fish bioassay is discussed.

In regards to the diesel tank removal project conducted at 2225 West 7th Street, Oakland, this office has not yet received any analytical documentation concerning the results of soil samples collected during the removal of the tank. The lack of this documentation will complicate this agency's acceptance of the nonhazardous self-classification for the waste from this project unless the assumption that only TPH-Diesel and not Benzene, Toluene, Xylene and Ethylbenzene is of concern, can be verified. Please submit a copy of the original soil analysis to minimize any confusion on this point.

If you have any questions concerning this matter, please contact me at (415) 271-4320.

Sincerely,

Dennis J. Byrne
Hazardous Materials Specialist

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Division Inspection Form

Site ID# _____ Site Name A N R Trucking Today's Date 3/23/90

Site Address 2225 W. 7th St EPA ID# _____

City Oakland Zip 94607 Phone _____

MAX Amt. Stored > 500lbs/55g/200cf? Y N
Hazardous Waste generated per month? _____

Inspection Categories:
___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
___ II. Business Plans, Acute Hazardous Materials
✓ III. Underground Tanks

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

I.A GENERATOR (Title 22)

	___ 1. Waste ID	* 66471
	___ 2. EPA ID	66472
	___ 3. > 90 days	66508
	___ 4. Label dates	66508
	___ 5. Biennial	66493
Manifest	___ 6. Records	66492
	___ 7. Correct	66484
	___ 8. Copy sent	66492
	___ 9. Exception	66484
	___ 10. Copies Rec'd	66492
Misc.	___ 11. Treatment	66371
	___ 12. On-site Disp. (H.S.&C.)	26189.5
	___ 13. Ex Haz. Waste	66570
Prevention	___ 14. Communications	67121
	___ 15. Aisle Space	67124
	___ 16. Local Authority	67126
	___ 17. Maintenance	67120
	___ 18. Training	67105
Contin. gency	___ 19. Prepared	67140
	___ 20. Name List	67141
	___ 21. Copies	67141
	___ 22. Emg. Coord. Trng.	67144
Containers, Tanks	___ 23. Condition	67241
	___ 24. Compatibility	67242
	___ 25. Maintenance	67243
	___ 26. Inspection	67244
	___ 27. Buffer Zone	67246
	___ 28. Tank Inspection	67259
	___ 29. Containment	67245
	___ 30. Safe Storage	67261
	___ 31. Freeboard	67257

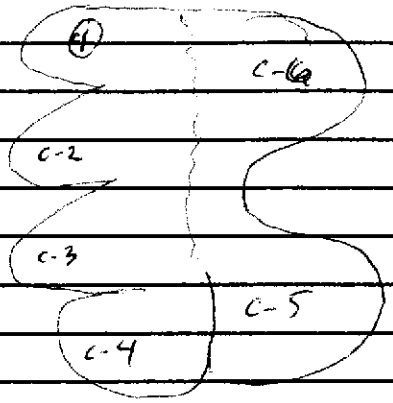
I.B TRANSPORTER (Title 22)

	___ 32. Applic./Insurance	66428
	___ 33. Comp. Cert./CHP Insp.	66448
	___ 34. Containers	66465
Manifest	___ 35. Vehicles	66465
	___ 36. EPA ID #s	66531
	___ 37. Correct	66541
	___ 38. HW Delivery	66543
	___ 39. Records	66544
Cont'd	___ 40. Name/ Covers	66545
	___ 41. Recyclables	66800

Comments:

Observed collection of 6 composite samples of spoils pile from UGT removal

↑
N



4 random areas of each composite pile collected 6 to 12" below surface and mixed in a bucket. Soil from bucket then packed into brass tubes.

Analysis to be for TPH-D

Rev 6/88

Contact: _____

Title: _____ Inspector: _____

Signature: _____ Signature: _____

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Division Inspection Form

Site ID# _____ Site Name ANR Freight Today's Date 3/16/90

Site Address 2225 W. 7th St EPA ID# _____

City Oakland Zip 94607 Phone _____

MAX Amt. Stored > 500lbs/55g/200cf? Y N
Hazardous Waste generated per month? _____

Inspection Categories:
___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
___ II. Business Plans, Acute Hazardous Materials
✓ III. Underground Tanks

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

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	13. Ex Haz. Waste	66570
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	15. Aisle Space	67124
	16. Local Authority	67126
	17. Maintenance	67120
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	34. Containers	66465
Manifest	35. Vehicles	66465
	36. EPA ID #s	66531
	37. Correct	66541
	38. HW Delivery	66543
	39. Records	66544
Cont'rs	40. Name/ Covers	66545
	41. Recyclables	66800

Comments:

Observed removal of 1 UGT, 10,000 gal diesel

Dolores gave OK to standin for S. Hallett

250 lb ice added, LEL 0%

2 soil sample collected from 10'
1 water sample

No obvious holes in tank

Hole to be backfilled immediately with clean fill

Rush on sample analysis
Marshall D Ryan 658-6300
(408) 436-1675

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Contact: _____

Title: _____ Inspector: _____

Signature: _____ Signature: _____

STATE COMPENSATION INSURANCE FUND

P.O. BOX 807, SAN FRANCISCO, CA 94101-0807

CERTIFICATE OF WORKERS' COMPENSATION INSURANCE

JULY 1st 1989

POLICY NUMBER: 0758432 - 89
CERTIFICATE EXPIRES: 7-8-90

CITY OF OAKLAND
INSPECTIONAL SERVICES DEPT.
#1 CITY HALL PLAZA
OAKLAND
CA 94612

This is to certify that we have issued a valid Workers' Compensation insurance policy in a form approved by the California Insurance Commissioner to the employer named below for the policy period indicated.

This policy is not subject to cancellation by the Fund except upon ten days' advance written notice to the employer.

We will also give you TEN days' advance notice should this policy be cancelled prior to its normal expiration.

This certificate of insurance is not an insurance policy and does not amend, extend or alter the coverage afforded by the policies listed herein. Notwithstanding any requirement, term, or condition of any contract or other document with respect to which this certificate of insurance may be issued or may pertain, the insurance afforded by the policies described herein is subject to *all the terms, exclusions and conditions of such policies.*

John A. Wolff

PRESIDENT

Should any of the above described policies be cancelled before the expiration date thereof, the issuing company shall mail 10 days written notice to the below named certificate holder.

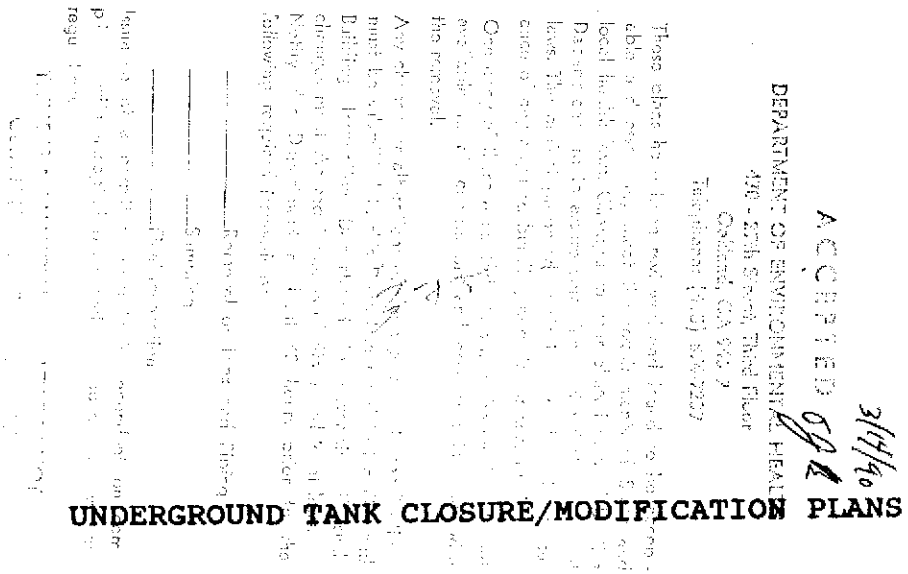
EMPLOYER

[illegible] CONSTRUCTION INC
[illegible]
CASTRO VALLEY
[illegible]

COPY FOR [illegible]

OLD 262A

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
80 SWAN WAY, ROOM 200
OAKLAND, CA 94621
PHONE NO. 415/271-4320



UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

1. **Business Name** ANR FREIGHT SYSTEM

   Business Owner KEN HAILE

2. **Site Address** 2225 W. 7TH STREET

   City OAKLAND, CA. **Zip** 94607 **Phone** 415-658-6300

3. **Mailing Address** C/O McCUTCHAN MAILING SERVEICE - 1950 COLONY ST.,

   City MOUNTAIN VIEW, CA. **Zip** 94043 **Phone** _____

4. **Land Owner** KEN HAILE

   Address P.O. BOX 5070 **City, State** DENVER, CO. **Zip** 80217

5. **EPA I.D. No.** CAD981657414

6. **Contractor** VERL'S CONSTRUCTION, INC.

   Address 753 PERALTA AVE.

   City SAN LEANDRO, CA. 94577 **Phone** 415-568-1234

   License Type A,B, & HAZ. **ID#** 487537

7. **Consultant** SCS ENGINEERS

   Address 6761 SIERRA COURT, SUITE D.

   City DUBLIN, CA. 94568 **Phone** 415-829-0661

8. Contact Person for Investigation

Name BERT McCUTCHAN Title PROJECT MANAGER

Phone 415-854-3855

9. Total No. of Tanks at facility 8 (

10. Have permit applications for all tanks been submitted to this office? Yes [ ] No [ ]

11. State Registered Hazardous Waste Transporters/Facilities

a) Product/Waste Tranporter

Name _____ EPA I.D. No. _____

Address _____

City _____ State _____ Zip _____

b) Rinsate Transporter

Name H&H SHIPPING SERVICE EPA I.D. No. CAD0004771168

Address 220 CHINA BASIN ROAD

City SAN FRANCISCO State CA Zip 94107

c) Tank Transporter

Name H&H SHIPPING SERVICE EPA I.D. No. _____

Address 220 CHINA BASIN ROAD

City SAN FRANCISCO State CA. Zip 94107

d) Tank Disposal Site

Name _____ EPA I.D. No. _____

Address _____

City _____ State _____ Zip _____

e) Contaminated Soil Transporter

Name _____ EPA I.D. No. _____

Address _____

City _____ State _____ Zip _____

12. Sample Collector

Name KENT MADENWALD

Company SCS ENGINEERS

Address 6761 SIERRA COURT, SUITE D.

City DUBLIN State CA. Zip 94568 Phone 415-829- 0661

13. Sampling Information for each tank or area

Tank or Area		Material sampled	Location & Depth
Capacity	Historic Contents (past 5 years)		
10,000	GAS		2 FEET BELOW TANK

14. Have tanks or pipes leaked in the past? Yes [ ] No [ ]

If yes, describe. _____

15. NFPA methods used for rendering tank inert? Yes [ ] No [ ]

If yes, describe. STEAM RINSE AND DRY_ICE 7.5 lbs.

An explosion proof combustible gas meter shall be used to verify tank inertness.

16. Laboratories

Name SCS ENGINEERS SCS Analytical Lab

Address ~~6761 SIERRA COURT, SUITE D.~~ 2860 Walnut Ave

City ~~DUBLIN~~ Long Beach State CA. Zip ~~94568~~ 90806

State Certification No. 205

17. Chemical Methods to be used for Analyzing Samples

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Number
GASOLINE	EPA 5030	LUFT MANUAL GUIDELINES MODIFIED 8015
BTX+E		8020 or 8240

18. Submit Site Safety Plan

19. Workman's Compensation: Yes [XX] No [ ]

Copy of Certificate enclosed? Yes [XX] No [ ]

Name of Insurer STATE INSURANCE FUND

20. Plot Plan submitted? Yes [ ] No [ ]

21. Deposit enclosed? Yes [ ] No [ ]

22. Please forward to this office the following information within 60 days after receipt of sample results.

a) Chain of Custody Sheets

b) Original Signed Laboratory Reports

c) TSD to Generator copies of wastes shipped and received

d) Attachment A summarizing laboratory results

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true. I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Saftey and Health Administration) requirements concerning personnel and safety.

I will notify the Department of Environmental Health at least two (2) working days (48 hours) after approval of this closure plan in advance to schedule any required inspections. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

Signature of Contractor

Name (please type) Verl K Rothlisberger

Signature VERL K. ROTHLISBERGER

Date 3-6-90

Signature of Site Owner or Operator

Name (please type) BERT McCUTCHAN

Signature Bert McCutchan for A-D-R

Date 3-6-90

NOTES:

1. Any changes in this document must be approved by this Department.

2. Any leaks discovered must be submitted to this office on an underground storage tank unauthorized leak/contamination site report form within 5 days of its discovery.

3. Three (3) copies of this plan must be submitted to this Department. One copy must be at the construction site at all times.

4. After approval of plan, notification of at least two (2) working days (48 hours) must be given to this Department prior to removal of tank(s).

5. A copy of your approved plan must be sent to the landowner.

6. Triple rinse means that:

   a) Final rinse must contain less than 100 ppm of Gasoline (EPA method 8020 for soil, or EPA method 602 for water) or Diesel (EPA method 418.1). Other methods for halogenated volatile organics (EPA method 8010 for soil, EPA method 601 for water) may be required. The composition of the final rinse must be demonstrated by an original or facsimile report from a laboratory certified for the above analyses.

   b) Tank interior is shown to be free from deposits or residues upon a visual examination of tank interior.

   c) Tank should be labelled as "tripled rinsed; laboratory certified analysis available upon request" with the name and address of the contractor.

If all the above requirements cannot be met, the tank must be transported as a hazardous waste.

7. Any cutting into tanks requires local fire department approval.

UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

ATTACHMENT A

SAMPLING RESULTS

Tank or Area	Contaminant	Location & Depth	Results (specify units)

INSTRUCTIONS

2. SITE ADDRESS
Address at which closure or modification is taking place.

5. EPA I.D. NO.
This number may be obtained from the State Department of Health Services, 916/324-1781.

6. CONTRACTOR
Prime contractor for the project.

7. OTHER
List professional consultants here.

12. SAMPLE COLLECTOR
Persons who are collecting samples.

13. SAMPLING INFORMATION
Historic contents - the principal product(s) used in the last 5 years.

Material sampled - i.e., water, oil, sludge, soil, etc.

16. LABORATORIES
Laboratories used for chemical and geotechnical analyses.

17. CHEMICAL METHODS:
All sample collection methods and analyses should conform to EPA or DHS methods.

Contaminant - Specify the chemical to be analyzed.

Sample Preparation Method Number - The means used to prepare the sample prior to analyses - i.e., digestion techniques, solvent extraction, etc. Specify number of method and reference if not an EPA or DHS method.

Analysis Method Number - The means used to analyze the sample - i.e., GC, GC-MS, AA, etc. Specify number of method and reference if not a DHS or EPA method.

NOTE:
Method Numbers are available from certified laboratories.

18. SITE SAFETY PLAN
A plan outlining protective equipment and additional specialized personnel in the event that significant amount of hazardous materials are found. The plan should consider the availability of respirators, respirator cartridges, self-contained breathing apparatus (SCBA) and industrial hygienists.

19. ATTACH COPY OF WORKMAN'S COMPENSATION

20. PLOT PLAN

The plan should consists of a scaled view of the facility at which the tank(s) are located and should include the following information:

a) Scale

b) North Arrow

c) Property Line

d) Location of all Structures

e) Location of all relevant existing equipment including tanks and piping to be removed

f) Streets

g) Underground conduits, sewers, water lines, utilities

h) Existing wells (drinking, monitoring, etc.)

i) Depth to ground water

j) All existing tanks in addition to the ones being pulled

rev. 9/88
mam

(916) 626-4802

Dan Hinrichs, P.E.

DJH Engineering
4541 Luneman Road
Placerville, CA 95667

FAX (916) 626-9427

March 1, 1990

Mr. Bert McCutchan
Project Manager
Nesco
4107 South 72nd East Avenue
Tulsa, Oklahoma 74145

Subject: ANR Freight
Oakland, CA.

Dear Mr. McCutchan;

Following is the proposal to abandon:

A). One 10,000 gallon underground storage tank. We understand the tank was used to store gasoline fuel.

This proposal covers the following:

1. Contractors guarantee to provide the following:

   A). Insurance covering general liability, including underground explosion & collapse hazard, broad form property damage and personal injury $1,000,000.
   B). Automobile liability covering all owned autos and hired autos, PL & PD combined $1,000,000
   C). Proof of Workers Compensation.
   D). Warranty for a one year period on all work performed.

2. Expose and remove tank as noted above.

3. Properly disposing of tank in a State and Federally excepted site.

4. Backfill excavation with sand and jet to provide compaction. No compaction tests will be provided, however, contractors warranty will cover any problems arising from improper placement of fill.

5. Surface tank area with 4" of Concrete.

6. All permits.

7. Soil analysis, lab costs.

TOTAL BID AMOUNT: $ 11,000.00
Payment: 25% upon acceptance of proposal $ 2,750.00
50% when tanks are removed $ 5,500.00
Remainder due upon completion $ 2,750.00

Bid good for 60 days.

The following items are not a part of this contract and shall be completed as an extra.

- Tank size is different from that designated
- Tank pit is contaminated and requires the export of contaminated soil and/or import of additional fill material
- Contents are of a different nature than that specified
- Tank is overlain with utility lines that require repair or extra work during removal or backfilling
- Tank is not empty and contents need to be pumped
- Concrete debris can not be placed in excavation
- Water is not provided by owner
- Fencing around excavation is required
- Barricades are needed around excavation for over 60 days after tanks are removed
- Any other unforeseen conditions that may arise
- Bracing or shoring is required
- Shoring becomes necessary
- If fencing or barricades are stolen owner will assume responsibility
- Job is broken into separate jobs or times of removal
- Final report is necessary from soil engineer

Mr. Verl K. Rothlisberger
President

Mr. Bert McCutchan
NESCO

3-1-90
Acceptance Date

verbal OK given on
nuclear classification
written to follow
7/19/90

NESCO
NATIONAL ENVIRONMENTAL SERVICE COMPANY
4107 SOUTH 72nd EAST AVENUE
TULSA, OKLAHOMA 74145
(800) 328-8335 (918) 622-4533 (918) 622-6235 FAX

December 27, 1989

State Water Resources Control Board
OUST
P.O. Box 944212
2014 T Street
Sacramento, Ca 95814

Gentlemen:

This letter is to inform you of our intent to remove an underground storage tank from the ANR Freight Systems terminal located at 2225 7th Street in Oakland, California and to submit the required thirty (30) day notification for removal. The tank is a 10,000 gallon steel tank and it is not presently in use.

Enclosed is a site drawing showing the location of the tank.

If you have any questions or require further information, please call us at (918) 622-4533.

Sincerely,

Bert McCutchan

Norm Stafford

BM/rvb
cc: ANR - Bruce Bullock
Office of Hazardous Materials - Dennis Byrne

Enc

NESCO

NATIONAL ENVIRONMENTAL SERVICE COMPANY

4107 SOUTH 72nd EAST AVENUE
TULSA, OKLAHOMA 74145

(800) 328-8335 (918) 622-4533 (918) 622-6235 FAX

Mr. Dennis Byrne
Office of Hazardous Materials
80 Swan Way Suite 200
Oakland, California 94621

Mr. Byrne:

Enclosed is the information we discussed regarding the ANR Freight Terminal located at 2225 West 7th Street, in Oakland, California. Included are a site plan showing the locations of the test borings relative to the tanks, laboratory results of the samples collected and an aproximation of the contamination plume.

Our contact person at ANR is Mr. Ken Haile. He can be reached at 800-525-2061. The terminal manager in Oakland is Mr. Bert Steed. His number is (415)658-6300.

If you have any questions regarding this information or if you require additional information, please call us at (918)622-4533.

Sincerely,

Kelly L. Ross
Environmental Engineer

RAMCON
Engineering & Environmental Contracting

P.O. Box 1026
3751 Commerce Drive
West Sacramento, CA 95691

Phone (916) 372-7535
Fax (916) 372-4209

RAMCON
SITE HEALTH AND SAFETY PLAN

Contractor: RAMCON - 3751 COMMERCE DR. WEST SAC, CA 95691
Site Name: ANR FREIGHT
Site Address: 2225 7TH STREET
OAKLAND, CA 94606
Job No: 476001

ON SITE ORGANIZATION AND COORDINATION - Police or Fire Call 911

Site Manager: John Pile **Pager:** 440-3826 **Phone:** 372-7535
Responsibilities: Oversee tank removal operations, air monitoring, determining when site level will be changed and arrange for all necessary inspections.

HAZARD EVALUATION

1. Be aware of area where work is performed. Stay clear of excavation equipment during operations to avoid physical injury.
2. Set up a perimeter around work area with "No Smoking" signs posted to avoid fire hazards and unwanted personnel.
3. Have respirators, Tyveks suits and gloves readily available for personal protection when needed.
4. Have (2) 20Lb A:120 B-C dry chemical fire extinguisher available at all times.
5. Monitor air around excavation for any hazardous vapors.
6. All employees are to wear hard hats to avoid injuries to head area.
7. No eating, drinking or smoking at work site.
8. In the event air monitoring reached 10%b of the lower explosive limit, the site will be evacuated and the fire inspector notified.
9. In the event L.E.L reading goes above 10% inside tank, dry ice will be introduced into tank to render tank non-explosive.
10. All Cal OSHA regulations will be enforced.

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DAILY BRIEFINGS

1. Inform each employee of what work needs to be accomplished during the work day.
2. Review any problems that may have occurred the prior day.
3. Inform employees on the status of air quality. Review respirator donning procedure if applicable.
4. Inform employees on visitors to site that day.
5. Review weather conditions and what signs to watch our for. If weather is going to be abnormal, take necessary breaks.
6. Reiterate the fact, that safety comes first.
7. Have open discussion with employees to answer any questions or problems.

AIR AND PERSONAL MONITORING DEVISES

We will be using the Gastechtor 1314 and the LEL 02 Meter to monitor the concentrations of hydrocarbons & explosive mixture in the air and in the dirt. The Gastechtor is calibrated weekly with Hexane.

PERSONNEL PROTECTIVE EQUIPMENT

Employees will work at Level D until air monitoring indicates a need for a change. Level D protection will consists of hard hats, steel toed boots, ear and eye protection and normal work clothes (Blue jeans and company shirts). When air monitoring indicates TPH levels above 50 PPM or Benzene levels above 1 PPM respirators will be donned along with Tyvek suits and gloves. Filter cartridge will be changed when break through is achieved. At Level C air monitoring will be changed from every 15 minutes to every 5 minutes. When employees reach immediate break through on filter cartridge then the site will be evacuated.

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SECURING THE SITE

Securing the site will consist of barricading the excavation with lighted barricades and barricade tape. All stockpiled soil will be covered with visqueen. The visqueen will be secured with tires and rope to hold it in place.

EMERGENCY CONTACTS AND PHONE NUMBERS:
POLICE OR FIRE CALL 911

Site Manager: John Pile - 916/372-7535 Office, 440-3826 Pager
916/765-1746 Mobile

Project Manager: John Pile - 916/372-7535 Office, 440-3826 Pager
916/761-1746 Mobile

Client Contact: Eldon Yeutter 303/320-3960

Environmental Agency: Alameda County Environmental Health
80 Swan Way, Room 200
Oakland, Ca 510/271-4320

Hospital: Alta Bates-Herrick Hospital
2001 Dwight Way - Berkley, Ca
510/540-4405

Site Phone Number: 510/658-6300

Ramcon's occupational Doctor: Dr. David E. Root
1 Scripps Drive
Sacramento, Ca 95825
(916) 924-9263

Dr. Root should be notified in the event of any occupational injury or exposure.

Workman's Compensation Carrier: Wright & Kimbrough
Policy Number: PC942941
Expires: 10/92

Poison: 415/476-2845 **EPA:** 800/424-8802 **Envirologic:** 207/773-3020

OSHA TRAINING

The certificates for the OSHA Hazardous Waste Training (29 CFR 1910.120) are to be shown to the engineer.