

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0253

RAFAT A. SHAHID, Assistant Agency Director

May 1, 1993  
STID # 1111

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(510) 271-4320

Mr. Syed Rizvi  
Unocal, Environmental Compliance  
911 Wilshire Blvd., Floor 11  
Los Angeles, CA 90017

Re: FIVE YEAR UNDERGROUND STORAGE TANK PERMIT AT,  
UNOCAL #5781, 3535 PIERSON STREET, OAKLAND 94619

Dear Mr. Rizvi:

Enclosed is your five year permit to operate a total of three underground storage tanks at the above referenced facility. These tanks are double-walled with fiberglass coating. Their associated piping is also double-walled, with fiberglass secondary piping.

To operate under a valid permit, you are required to comply with the conditions in Title 23 of the California Code of Regulations (CCR). Based on these requirements, both tanks and piping are monitored by an electronic alarm system.

You may consult the revised Title 23, CCR for additional requirements. To obtain a copy of the regulations, you may contact the State Water Resources Control Board at (916) 657-0917.

If you have any questions regarding the permit to operate, do not hesitate to contact me at (510) 271-4320, Monday through Thursday.

Sincerely,

Kevin Tinsley  
Hazardous Materials Specialist

c, Edgar Howell, Chief - files (kt)  
Brian Oliva, Hazardous Materials Specialist  
Jack Chi Chan, Unocal Dealer

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DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415) 271-4320

Certified Mail # 062 127 732

January 5, 1990

Mr. Rick Sisk  
Unocal Corp.  
P.O. Box 8175  
Walnut Creek, CA 94596

Subject: Unauthorized Release  
Removal of Underground Fuel and Waste Oil Tanks  
Unocal Service Station # 5781  
3535 Pierson  
Oakland, CA

Dear Mr. Sisk:

Thank you for submitting the results for analysis of subsurface soil samples taken in response to the underground tank removals from the above shown facility. Because of the degree of contamination found, this facility is considered to have experienced a confirmed release of petroleum hydrocarbons that has impacted subsurface soil and ground water. The extent of this contamination must be assessed and remediated.

Our office will be the lead agency overseeing both the soil and groundwater remediation of this site. The Regional Water Quality Control Board (RWQCB) is currently unable to oversee the large number of contamination cases within Alameda County and has delegated the handling of this case to our Division. We will be in contact with the RWQCB in order to provide you with guidance concerning the RWQCB's remediation requirements. However, please be aware that you are responsible for diligent actions to protect waters of the State.

To complete contaminant assessment and begin remediation, we require that you submit a work plan which, at a minimum, addresses the items listed below and presents a timetable for their completion. Please submit this workplan within 30 days of the date of this letter.

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## I. Introduction

- A. Statement of scope of work
- B. Site map showing location of existing and past underground storage tanks
- C. Site History
  - provide historical site use and ownership information. Include a description of types and locations of hazardous materials used on site.

## II. Site Description

- A. Vicinity description including hydrogeologic setting
- B. Initial soil contamination and excavation results
  - provide sampling procedures used
  - indicate depth to ground water
  - describe soil strata encountered
  - provide soil sampling results, chain of custody forms, identity of sampler
  - describe methods for storing and disposal of all soils

## III. Plan for determining extent of soil contamination on site

- A. Describe approach to determine extent of lateral and vertical contamination
  - identify subcontractors, if any
  - identify methods or techniques used for analysis
  - provide sampling map showing all lines of excavation and sampling points
  - if a step out procedure is used, define action level for determination of "clean" isopleth
  - provide chain of custody forms, lab analysis results, all receipts and manifests, & identity of sampler
- B. Describe method and criteria for screening clean versus contaminated soil. If onsite soil aeration/bioremediation is to be utilized, then provide a complete description of method that includes:
  - volume and rate of aeration/turning
  - method of containment and cover
  - wet weather contingency plans
  - permits obtained
- C. Describe security measures

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#### IV. Plan for determining ground water contamination

- Construction and placement of wells should adhere to the requirements of the "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks". Provide a description of placement and rationale for the location of monitoring wells including a map to scale.
- The placement and number of wells must be able to determine the extent and magnitude of the free product and dissolved product plumes.

##### A. Drilling method for construction of monitoring wells

- expected depth and diameter of monitoring wells
- date of expected drilling
- casing type, diameter, screen interval, and pack and slot sizing techniques
- depth and type of seal
- development method and criteria for adequacy of development
- plans for cuttings and development water

##### B. Ground water sampling plan

- method for free product measurement, observation of sheen
- well purging procedures
- sample collection procedures
- chain of custody procedures
- procedures for determining ground water gradient

##### D. Sampling schedule

- measure free product weekly for first month following well installation
- measure free product and dissolved constituents monthly for first three months.
- after first three months monitor quarterly.
- monitoring must occur a minimum of one year.

#### V. Provide a site safety plan

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## VI Development of a remediation Plan.

A. The remediation plan is to include a time schedule for remediation, and, at minimum, must address the following issues:

- removal of all free product. Manual bailing is not acceptable as a recovery system. Actual amount of free product removed must be monitored and tabulated.
- remediation of contaminated soils and dissolved constituents must follow RWQCB's resolution No. 68-16.
- soils containing 1,000+ ppm of hydrocarbons must be remediated. Soils containing between 100 and 1,000 ppm must be remediated unless sufficient evidence is provided which indicates no adverse effects on groundwater will occur. Clean up of soils to 100 ppm is strongly recommended.
- design of remedial action system should be based on a review of hydrogeologic and water quality data and on an evaluation of mitigation alternatives. The determination of probable capture zone(s) of extraction system(s) should be based on aquifer characteristics as determined by aquifer test data

## VII Reporting

- A. Technical reports should be submitted with a cover letter from Unocal. The letter must be signed by an authorized representative.
- B. Monthly reports must be submitted for the next three months with the first report due 90 days from the above letter date.
- C. Quarterly reports must be submitted with the first report due 90 days after the final monthly report. These reports should describe the status of the investigation and cleanup.
- D. All reports and proposals must be signed by a California-Certified Engineering Geologist, California Registered Geologist or a California-Registered Civil Engineer (see page 2, 2 June 1988 RWQCB document). A statement of qualifications should be included in

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all reports. Initial tank removal and soil sampling does not require such expertise; however, borehole and monitoring well installation and logging, and impact assessments do require such a professional.

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and RWQCB. You should be aware that this Division is working in conjunction with the RWQCB and that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a late response may result in referral of this case to the RWQCB for enforcement and may subject Unocal to civil liabilities imposed by the RWQCB to a maximum amount of \$1,000 per day. Any extensions of agreed upon time deadlines must be confirmed in writing by either this Division or the RWQCB.

Should you have any questions concerning the contents of this letter or the status of this case please feel free to contact me.

Sincerely,

Ariu Levi, Senior Hazardous Materials Specialist  
Alameda County Hazardous Materials Program

cc: Gil Jensen, Alameda County District Attorney, Consumer &  
Environmental Protection  
Rafat Shahid, Assistant Agency Director  
Ed Howell, Chief HazMat Unit  
Lester Feldman, SFRWQCB  
Howard Hatayama, DOHS  
Inspector Dawson, OFD  
Tony Miller, Paradisco  
Files