

September 13, 1991

Mr. Lynn Worthington
Better Homes Realty
5942 MacArthur Boulevard Suite B
Oakland, CA 94605

Re: Work Plan Review for the Former Exxon Station, 3055 35th
Avenue, Oakland, CA 94605

Dear Mr. Worthington,

On January 23, 1991 five underground storage tanks were removed from the above location. Soil samples were taken from the bottom of the tank excavations and also from the stockpiled soils. A Final Closure Report documenting the results of soil sample analyses, copies of sample chain-of-custody forms and hazardous waste manifests, documenting the appropriate disposal of the underground tanks, among other elements, had not been received by this department.

on Sept 3, 1991
no date has not been received subsequent to the Jan 91 tank removals.
Alameda County Environmental Health Department, Hazardous Materials Division ~~has received and reviewed~~ the Work Plan submitted by Consolidated Technologies for the above facility. The Work Plan proposes the installation of ten soil borings located around the locations of the former underground tanks and ancillary piping in order to collect initial data which following the tank removals had been collected but is unavailable.

The following issues regarding the Work Plan need to be ~~rectified~~^{addressed} before the Plan approval is granted:

- 1) You are required to have your consultant specify how all of the stock piled soil located on site will be characterized. You are also required to specify the frequency of the sampling, soil compositing scheduling and constituents which will be analyzed for.
- 2) You are required to analyze for the presence of Benzene, Toluene, Xylene and Ethyl-benzene (BTEX) in all analytical samples collected.
- 3) When borings are performed on all piping and dispensers it is not necessary sample greater than 3 feet beneath these locations. ✓
- 4) When sampling the area of the former (3) 4000 gallon and (1) 6000 gallon underground storage tanks you are required to collect a minimum of four samples or one sample per 20 lineal feet of open excavation. More samples are necessary in this area in order to more closely approximate the number of samples which are specified in the Regional Water Quality Document referred to as the Tri-Regional Recommendations (August 1990 revision).

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5) When collecting samples from the proposed borings you are requested to collect the first samples at 10 feet and also at 15 feet below the ground surface. These depths are thought to indicate a more representative tank bottom depth than the initial 5 to 7 foot depths specified in the proposed Work Plan.

6) When sampling in the area of suspected illegal waste oil dumping at the location of SB-8 you are requested to excavate the soil in this area, which must be retained on site. Once field screening indicates the likelihood of a clean sample a confirmatory sample will be collected in order to determine the soil condition.

7) You are required to have your consultant notify this department at least 24 hours prior to the initiation of the proposed work at the above location so that a representative from this office can be present during sample collection.

The proposed Work Plan as specified is not acceptable. You are requested to address each of the above issues in writing within 14 days of the receipt of this letter. Work plan approval will be granted upon the acknowledgment of these issues.

If you have any questions with regard to the contents of this letter you are requested to contact me at (510) 271-4320.

Sincerely,

Paul M. Smith
Hazardous Materials Specialist

cc:

Tracy Bennett, Consolidated Technologies
Eddie So, SFRWQCB
Charlene Williams, DHS
Gil Jensen, Alameda County District Attorney's Office of
Consumer and Environmental Affairs