

September 1, 1987

2198.17

Mr. Peter Johnson
California Regional Water Quality Control Board
San Francisco Bay Region
1111 Jackson Street, Rm. 6040
Oakland, CA 94607

Dear Mr. Johnson:

Subject: AC Transit Facilities Improvement Program
Division 4, Seminary Reconstruction
Contract D4-5, Maintenance Building
Requested Analyses of Six Soils Stockpiles - Sampling of August 26, 1987

The District, following conversations of Kaiser Engineers with Greg Zentner of the California Regional Water Quality Control Board and with Lowell Miller of the Alameda County Health Department, has again sampled the six stockpiles of soils on the referenced site. Samples were taken by Brown & Caldwell in strict adherence with applicable protocols, including chain of custody, and under the scrutiny of your staff. Samples were analyzed per your direction for the following:

1. Total petroleum hydrocarbons (TPH, high boiling fraction, in accordance with Guidelines for Addressing Fuel Leaks, CRWQCB San Francisco Bay Region, September 1985, using diesel as the standard).
2. Total oil and grease (TOG, using EPA Method 3550 and gravimetric analysis by Standard Method 503E).
3. Volatile organic compounds (VOC, EPA Method 8240).

Samples from stockpiles were 12 composited soils samples as follows.

08-579-1	Sample 1	Stockpile 1
08-579-2	Sample 2	Stockpile 2A
08-579-3	Sample 3	Stockpile 2B
08-579-4	Sample 4	Stockpile 2C
08-579-5	Sample 5	Stockpile 3
08-579-6	Sample 6	Stockpile 4A
08-579-7	Sample 7	Stockpile 4B
08-579-8	Sample 8	Stockpile 5A
08-579-9	Sample 9	Stockpile 5B
08-579-10	Sample 10	Stockpile 6A
08-579-11	Sample 11	Stockpile 6B
08-579-12	Sample 12	Stockpile 6C

The report from Brown & Caldwell is attached. In all cases:

1. TFH were less than detection level, <10 ppm.
2. VOA were less than detection level, <0.2 ppm each, <2 ppm acrolein, acrylonitrile.

Oil and grease analyses are summarized in Table 1. Stockpile 2 is known to be asphaltic rubble. All stockpiles are subsoils of asphalt paved areas. It is obvious that the TOG analysis is sensitive to asphaltic degradation products. It is also obvious that there is no relationship with either TPH or VOA and TOG results. The TOG measured represents the "baseline" conditions at the site which has repeatedly been paved with asphalt over the last 30 years.

We conclude from these TPH and VOA analyses, supported by the numerous analyses of soils for TPH, VOA, extractable organic priority pollutants, metals, and BTX analyses, that the soils stockpiled are not hazardous. Neither are they significantly contaminated with hazardous chemicals. Therefore, these stockpiled soils will continue to be used as engineered fill on the Seminary site. Soils removed from the site and used as engineered fill have been shown similar and is also nonhazardous.

Because we are concerned about the use of TOG as a measurement in soils which have been excavated from beneath asphalt pavement, we have had numerous discussions with soils experts at Kaiser Engineers, U.C. Berkeley, and EPA Cincinnati Labs. All agree that the use of TOG in soils is inadvisable and can lead to totally erroneous conclusions with respect to the TPH, VOA, or acid/basic extractable organics which are priority pollutants.

As previously planned, AC Transit will complete a groundwater monitoring system at the Seminary site as the construction is completed. We will monitor the water quarterly for TPH and BTX and periodically for VOA. This program will document the performance of the upgraded facilities and that the engineered fill use of the stockpiled soils and the current site conditions do not and will not significantly affect groundwater quality.

We would appreciate your prompt acknowledgment of these results.

Very truly yours,


George Skezas
Facilities Administrator

gd
Attachments

cc: H. M. Nahler - KE
S. Whitehead - KE
L. Hanson - KE
R. A. Shahid - Alameda County

TABLE 1

RESULTS OF TOG IN 12 COMPOSITED SAMPLES
AC TRANSIT SEMINARY RD SITESAMPLING DATE:
26 AUGUST 1987

Brown & Calwell ID	Stockpile Origin	TOG ppm
08-579-1	Stockpile 1	1,500
08-579-2	Stockpile 2 A	13,000
08-579-3	Stockpile 2 B	34,000
08-579-4	Stockpile 2 C	33,000
08-579-5	Stockpile 3	1,400
08-579-6	Stockpile 4 A	2,100
08-579-7	Stockpile 4 B	1,300
08-579-8	Stockpile 5 A	2,800
08-579-9	Stockpile 5 B	840
08-579-10	Stockpile 6 A	< 250 *
08-579-11	Stockpile 6 B	480
08-579-12	Stockpile 6 C	620

* It is not analytically reliable to attempt a detection level < 250 ppm using this methodology (EPA does not recommend a detection level for TOG < 250 ppm in solid matrix).



BROWN AND CALDWELL LABORATORIES

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ANALYTICAL REPORT

LOG NO: E87-08-579

Received: 26 AUG 87

Reported: 28 AUG 87

Mr. Lee Hanson
Kaiser Engineering
508 16th Street
Oakland, California 94612

Purchase Order: 20852

REPORT OF ANALYTICAL RESULTS

Page 1

LOG NO	SAMPLE DESCRIPTION, SOIL SAMPLES	DATE SAMPLED				
08-579-1	Stockpile 1					26 AUG 87
08-579-2	Stockpile 2A					26 AUG 87
08-579-3	Stockpile 2B					26 AUG 87
08-579-4	Stockpile 2C					26 AUG 87
08-579-5	Stockpile 3					26 AUG 87
PARAMETER		08-579-1	08-579-2	08-579-3	08-579-4	08-579-5
Oil and Grease, mg/kg		1500	13000	34000	33000	1400
Total Fuel Hydrocarbons, mg/kg		<10	<10	<10	<10	<10



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		26 AUG 87				
08-579-1	Stockpile 1	26 AUG 87				
08-579-2	Stockpile 2A	26 AUG 87				
08-579-3	Stockpile 2B	26 AUG 87				
08-579-4	Stockpile 2C	26 AUG 87				
08-579-5	Stockpile 3	-----				
PARAMETER		08-579-1	08-579-2	08-579-3	08-579-4	08-579-5
Chloromethane, mg/kg		<0.2	<0.2	<0.2	<0.2	<0.2
Dibromochloromethane, mg/kg		<0.2	<0.2	<0.2	<0.2	<0.2
Ethylbenzene, mg/kg		<0.2	<0.2	<0.2	<0.2	<0.2
Methylene chloride, mg/kg		<0.2	<0.2	<0.2	<0.2	<0.2
Tetrachloroethylene, mg/kg		<0.2	<0.2	<0.2	<0.2	<0.2
Trichloroethylene, mg/kg		<0.2	<0.2	<0.2	<0.2	<0.2
Trichlorofluoromethane, mg/kg		<0.2	<0.2	<0.2	<0.2	<0.2
Toluene, mg/kg		<0.2	<0.2	<0.2	<0.2	<0.2
Vinyl chloride, mg/kg		<0.2	<0.2	<0.2	<0.2	<0.2
trans-1,2-Dichloroethylene, mg/kg		<0.2	<0.2	<0.2	<0.2	<0.2
trans-1,3-Dichloropropene, mg/kg		<0.2	<0.2	<0.2	<0.2	<0.2



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08-579-6	Stockpile 4A	26 AUG 87				
08-579-7	Stockpile 4B	26 AUG 87				
08-579-8	Stockpile 5A	26 AUG 87				
08-579-9	Stockpile 5B	26 AUG 87				
08-579-10	Stockpile 6A	26 AUG 87				
PARAMETER		08-579-6	08-579-7	08-579-8	08-579-9	08-579-10
Oil and Grease, mg/kg		2100	1300	2800	840	<250
Total Fuel Hydrocarbons, mg/kg		<10	<10	<10	<10	<10



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08-579-7	Stockpile 4B	26 AUG 87				
08-579-8	Stockpile 5A	26 AUG 87				
08-579-9	Stockpile 5B	26 AUG 87				
08-579-10	Stockpile 6A	26 AUG 87				
PARAMETER	08-579-6	08-579-7	08-579-8	08-579-9	08-579-10	
Purgeable Priority Pollutants						
Extraction	08.27.87	08.27.87	08.27.87	08.27.87	08.27.87	
1,1,1-Trichloroethane, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
1,1,2,2-Tetrachloroethane, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
1,1,2-Trichloroethane, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
1,1-Dichloroethane, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
1,1-Dichloroethylene, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
1,2-Dichloroethane, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
1,2-Dichloropropane, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
1,3-Dichloropropene, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
2-Chloroethylvinylether, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
Acrolein, mg/kg	<2	<2	<2	<2	<2	
Acrylonitrile, mg/kg	<2	<2	<2	<2	<2	
Bromodichloromethane, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
Bromomethane, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
Benzene, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
Chlorobenzene, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
Carbon Tetrachloride, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
Chloroethane, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
Bromoform, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
Chloroform, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	



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08-579-6	Stockpile 4A	26 AUG 87				
08-579-7	Stockpile 4B	26 AUG 87				
08-579-8	Stockpile 5A	26 AUG 87				
08-579-9	Stockpile 5B	26 AUG 87				
08-579-10	Stockpile 6A	26 AUG 87				
PARAMETER	08-579-6	08-579-7	08-579-8	08-579-9	08-579-10	
Chloromethane, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
Dibromochloromethane, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
Ethylbenzene, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
Methylene chloride, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
Tetrachloroethylene, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
Trichloroethylene, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
Trichlorofluoromethane, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
Toluene, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
Vinyl chloride, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
trans-1,2-Dichloroethylene, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	
trans-1,3-Dichloropropene, mg/kg	<0.2	<0.2	<0.2	<0.2	<0.2	



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08-579-11	Stockpile 6B	26 AUG 87	
08-579-12	Stockpile 6C	26 AUG 87	
PARAMETER		08-579-11	08-579-12
Oil and Grease, mg/kg		480	620
Total Fuel Hydrocarbons, mg/kg		<10	<10



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08-579-11	Stockpile 6B	26 AUG 87	
08-579-12	Stockpile 6C	26 AUG 87	
PARAMETER		08-579-11	08-579-12
Purgeable Priority Pollutants		08.27.87	08.27.87
Extraction		<0.2	<0.2
1,1,1-Trichloroethane, mg/kg		<0.2	<0.2
1,1,2,2-Tetrachloroethane, mg/kg		<0.2	<0.2
1,1,2-Trichloroethane, mg/kg		<0.2	<0.2
1,1-Dichloroethane, mg/kg		<0.2	<0.2
1,1-Dichloroethylene, mg/kg		<0.2	<0.2
1,2-Dichloroethane, mg/kg		<0.2	<0.2
1,2-Dichloropropane, mg/kg		<0.2	<0.2
1,3-Dichloropropene, mg/kg		<0.2	<0.2
2-Chloroethylvinylether, mg/kg		<2	<2
Acrolein, mg/kg		<2	<2
Acrylonitrile, mg/kg		<0.2	<0.2
Bromodichloromethane, mg/kg		<0.2	<0.2
Bromomethane, mg/kg		<0.2	<0.2
Benzene, mg/kg		<0.2	<0.2
Chlorobenzene, mg/kg		<0.2	<0.2
Carbon Tetrachloride, mg/kg		<0.2	<0.2
Chloroethane, mg/kg		<0.2	<0.2
Bromoform, mg/kg		<0.2	<0.2
Chloroform, mg/kg		<0.2	<0.2
Chloromethane, mg/kg		<0.2	<0.2
Dibromochloromethane, mg/kg		<0.2	<0.2
Ethylbenzene, mg/kg		<0.2	<0.2



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08-579-11	Stockpile 6B	26 AUG 87	
08-579-12	Stockpile 6C	26 AUG 87	
PARAMETER		08-579-11	08-579-12
Methylene chloride, mg/kg		<0.2	<0.2
Tetrachloroethylene, mg/kg		<0.2	<0.2
Trichloroethylene, mg/kg		<0.2	<0.2
Trichlorofluoromethane, mg/kg		<0.2	<0.2
Toluene, mg/kg		<0.2	<0.2
Vinyl chloride, mg/kg		<0.2	<0.2
trans-1,2-Dichloroethylene, mg/kg		<0.2	<0.2
trans-1,3-Dichloropropene, mg/kg		<0.2	<0.2

D. A. McLean, Laboratory Director