ALAMEDA COUNTY **HEALTH CARE SERVICES**









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

October 13, 2006

Mr. Paul Mazza San Francisco Public Utilities Commission 1000 El Camino Real Millbrae, CA 94030

Subject: Fuel Leak Case No. FWD Sunol Yard, 505 Paloma Way, Sunol, CA

Dear Mr. Mazza:

I have been assigned as the caseworker for the above referenced case, which remains an open fuel leak case. Please send any future correspondence for this case to my attention. Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site for possible case closure. The case includes fuel and chemical releases from three separate areas of the San Francisco Public Utilities Commission (SFPUC) Sunol facilities:

- Sunol Pump Station. Three underground storage tanks (USTs), consisting of one 10,000-gallon diesel UST and two 400-gallon waste oil USTs, were removed from the Sunol Pump Station in November 1993. Total petroleum hydrocarbons as diesel (TPHd), oil and grease, and semi-volatile organic compounds (SVOCs) were detected in soil samples collected from the tank excavations.
- Sunol Maintenance Yard. Three USTs, consisting of one 550-gallon regular gasoline UST, one 1,000-gallon unleaded gasoline UST, and one550-gallon diesel UST, were removed from the southern portion of the Sunol Maintenance Yard in May 1990. Total petroleum hydrocarbons as gasoline (TPHg), TPHd, and BTEX were detected in soil samples collected from the tank excavations.
- Sunol Maintenance Yard. An unlined sump near the southeast corner of a storage shed in the Sunol Maintenance Yard was reportedly used for disposal of waste oil and other liquids. The storage shed was located approximately 50 feet southwest of the three USTs in the Maintenance Yard. Total recoverable hydrocarbons, oil and grease, volatile organic compounds (VOCs), and metals were detected in soil samples collected from the spill area.

In order to complete our review, we request that you provide the additional information requested in the technical comments below. Therefore, we request that you address the following technical comments and send us a Response to Comments and Well Survey by January 17, 2007.

TECHNICAL COMMENTS

Sunol Filtration Galleries. A report entitled, "Groundwater Monitoring Well Sampling at Sunol Water Department Facility," dated March 18, 1992, and prepared by Crosby & Overton, Inc. reports that, "the largest extraction of groundwater in the Sunol subbasin is within one quarter mile of the site at the Sunol filter galleries, which lie approximately 15 feet Mr. Paul Mazza October 13, 2006 Page 2

below ground surface." We request that you provide a map showing the location of the Sunol filter galleries in relation to the three areas where releases have occurred. In addition, please provide a description of the volume and duration of groundwater extraction from the Sunol filter galleries, the depth, configuration and elevation of the galleries, and any available information on groundwater flow velocities and vertical hydraulic gradients in this area of the Sunol subbasin. Please use this information to evaluate the potential for the galleries to be receptors for releases from the fuel leak sites. Present your evaluation in the Response to Comments requested below.

- Detailed Well Survey. ACEH requests that you locate all wells (monitoring and production 2. wells: active, inactive, standby, decommissioned, abandoned and dewatering, drainage and cathodic protection wells) within 2,000 feet of the subject site. Well locations are to be shown on a map or aerial photograph of the site with a scale. Well construction details are to be listed in an accompanying table and are to include the well designation, location, total depth, diameter, screen or perforated interval, date of well installation, current status, historic use, owner of the wells, and other well construction details that may be relevant. As part of your detailed well survey, please perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, which can act as pathways for migration of contamination at and/or from your site. Please review historical sources such as Sanborn maps, aerial photos, etc., when performing the background study. Include appropriate photographic prints, in stereo pairs, of historic aerial photos used as part of your study. We also request that you list by date all aerial photographs available for the site from the aerial survey company or library you use during your study. Please refer to the Regional Board's guidance for identification, location, and evaluation of potential deep well conduits when conducting your preferential pathway study. We recommend that you obtain well information from both the Zone 7 Water Agency and the State of California Department of Water Resources. Two water wells, reportedly installed by the Alameda County Water District for measuring water levels and analyzing groundwater samples for pesticides, are within approximately 80 to 300 feet of the Sunol Maintenance Yard. A map showing the locations of the two wells is included as Attachment A to this correspondence. Please include discussion of the status (active, inactive, or decommissioned) and details of well construction in the requested Well Survey. In addition, please research whether any groundwater samples collected from these wells have been analyzed for petroleum hydrocarbons, VOCs, metals, or other potential chemicals of concern (COCs).
 - 3. Soil Contamination Beneath Storage Shed. In November 1989, contaminated soil was excavated from the southeast corner of a storage shed located in the Sunol Maintenance Yard, where San Francisco Water Department personnel reportedly disposed of waste oil and solvents onto the ground. Analysis of soil samples indicated the presence of total oil and grease (TOG) at concentrations up to 31,000 ppm, various VOCs at concentrations ranging from 0.3 to 3.2 ppm, and elevated concentrations of metals. The excavation was extended to a depth of 7.5 feet below grade at the lowest point of the excavation. Confirmation soil samples collected at the base of the excavation contained total recoverable hydrocarbons at concentrations of 120 to 150 ppm. In addition, the excavation could not be extended beneath the concrete foundation of the shed. Elevated concentrations of TOG and potential VOCs were left in place beneath the shed. The report presenting the results of the removal and confirmation sampling ("Removal of Oil and Grease Contaminated Soils and Confirmation Sampling and Analysis at the Sunol Facility," American Environmental

Management Corporation, January 4, 1990) concluded, "The area under the existing storage shed still has high concentrations of oil and grease as well as potential VOCs and should be removed. It [is] my understanding that the storage shed is scheduled for removal sometime in 1990 and that the SFDPH will remove the contaminated soil at that time." A work plan to conduct sampling in the area of the storage shed was submitted on March 12, 2002 (Work Plan for Soil and Groundwater Sampling, Sunol Maintenance Yard, Weiss Associates, March 13, 2002). On August 22, 2002, a soil boring was advanced beneath the shed to a depth of 20 feet below grade. The boring originated 3 feet from the shed and was angled at 14 degrees to terminate 20 feet below the shed. TPHd was detected in soil samples from the boring at concentrations of 1.3 to 3.1 milligrams per kilogram (mg/kg) but TPHd was not detected in one grab groundwater sample collected from the boring. Oil and grease, TPHg, BTEX, MTBE, and VOCs were not detected in the soil or groundwater samples from the angled boring. Based on the absence of COCs in groundwater and minimal levels of TPHd detected in soil beneath the shed, the report recommended that ACEH consider case closure. We assume that the August 2002 scope of work was conducted because the storage shed was not removed and that residual contamination below the shed was left in place. In the Response to Comments requested below, please confirm that this is the case.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

January 17, 2007 – Response to Comments and Well Survey Results

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

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 are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker 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

ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

July 10, 2002

RO0000340

Mr. Paul Mazza San Francisco Public Utilities Commission 1000 El Camino Real Millbrae, CA 94030 ENVIRONMENTAL HEALTH SERVICES

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

RE: San Francisco Water Department, Sunol Pump Station, 505 Paloma Way, Sunol, Alameda County – Soil and Water Investigation Workplan

Dear Mr. Mazza:

I have completed review of the March 13, 2002 Weiss Associates (WA) soil and water investigation (SWI) workplan for the subject San Francisco Water Department (SFWD), Sunol Pump Station. The WA workplan calls for the installation of three (3) temporary sampling points at the site, and the collection of both soil and groundwater samples from each.

The cited WA workplan is accepted as submitted with the following clarifications:

- Semi-Volatile Organic Compounds (SVOC), and Oil & Grease, are to be added to the proposed suite
 of sample analyses.
- 2. EPA Method 8260 is to be used for methyl tert-butyl ether (MtBE) confirmation.
- 3. An additional sample point is to be added just West of the former waste and lube oil tanks (in the area of former CDM boring BH-6), in addition to another sample point to be added midway between the former waste and lube oil tanks cluster, and the former 10,000 fuel tank (in the area of CDM boring BH-4).

This workplan is to be implemented within 60 days of the date of this letter.

Please call me at (510) 567-6783 to advise when field work has been scheduled.

Sincerely,

Scott O. Seery, CHMM

Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB

Mat Katen, Zone 7 Water Agency, 5997 Parkside Dr., Pleasanton, CA 94588-5127 Randall Smith, S.F. Public Utilities Commission, 3801 Third St., Ste. 600, S.F., CA 94124 Melissa Tumbleson, Weiss Assoc., 5801 Christie Ave., Ste. 600, Emeryville, CA 94608-1827



PUBLIC UTILITIES COMMISSION CITY AND COUNTY OF SAN FRANCISCO

WILLIE L. BROWN, JR. MAYOR

ANSON B. MORAN GENERAL MANAGER Maintenance Yard

HETCH HETCHY WATER AND POWER ALL PROTECTION SAN FRANCISCO WATER DEPARTMENT

98 JUL - 1 PM 3: (SAN FRANCISCO CLEAN WATER PROGRAM

DATE:

June 29, 1998

Mr. Scott Seery, Hazardous Materials Specialist Alameda County Department of Environmental Health 1131 Harbor Bay Parkway Alameda, CA 94502

Mr. Seery:

This letter is in followup to our conversation the week of June 8 regarding site closure for UST removal at the San Francisco Public Utilities Commission's (PUC) maintenance yard at 505 Paloma Way in Sunol. The PUC believes that all necessary work has been completed for closure of the site. It is my understanding that you will review the site file during the next few weeks, and will be in contact if there are any further measures which must be taken.

I have an additional question regarding the status of another PUC site, the Sunol Pump Station, where a UST was removed late in 1995. Was any further action required at this site? Has a letter been sent to your office requesting site closure? If not, please inform me of your current understanding of this site's status. I will arrange for the necessary course of action.

Please call me at (415) 695-7387 should you have any questions in this matter.

Sincerely,

John Mundy, Regulatory Specialist

San Francisco Public Utilities Commission

Bureau of Environmental Regulation and Management

Cc:

Paul Mazza

File

pullip station



environmental engineers, scientists, planners, & management consultants

CAMP DRESSER & McKEE INC.

One Walnut Creek Center 100 Pringle Avenue, Suite 300 Walnut Creek, California 94596 510 933-2910, Fax: 510 933-4174

March 1, 1995

Mr. Scott O. Seery, CHMM Senior Hazardous Materials Specialist Alameda County Environmental Health Department Environmental Protection Division 1131 Harbor Bay Parkway, #250 Alameda, California 94502-6577

Subject:

Work Plan Addendum

Sunol Pump Station

Dear Mr. Seery:

Per our telephone conversation on the morning of March 1, 1995, Camp Dresser & McKee Inc. (CDM) would like to record the following changes to our work plan for remediation and groundwater monitoring at the Sunol Pump Station located at 505 Paloma Way in Sunol, California:

- CDM plans on using a portable, infrared analyzer for screening excavation sidewalls and bottom for total recoverable petroleum hydrocarbons during excavation.
- All final confirmatory samples will be analyzed at a fixed-base laboratory by EPA Methods 8020, for BTEX compounds, and 8015M for diesel and oil.
- Confirmatory samples taken in the vicinity of the waste and lube oil tanks will also be analyzed by EPA Method 8100 for polynuclear aromatics (PNAs) which includes all analytes detected by previous semi-volatile organics analyses (EPA Method 8270) conducted on site samples.
- Groundwater samples collected for future monitoring wells will be analyzed for BTEX, diesel, oil and PNAs.

I can be reached at (510) 933-2910, extension 285 if you have any questions.

Very truly yours,

CAMP DRESSER & McKEE INC.

Jason Preece, R. G., C. E. G

Geologist

cc: Ronald Krzyzanowski, SFDPW Paul Mazza, SFWD

HEALTH CARE SERVICES

AGENCY DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

STID 3118

January 18, 1995

Mr. Paul Mazza San Francisco Water Department 10000 El Camino Real Millbrae, CA 94030 ALAMEDA COUNTY ENV. HEALTH DEPT. ENVIRONMENTAL PROTECTION DIVISION 1131 HARBOR BAY PKWY., #250 ALAMEDA CA 94502-6577 (510)567-6700

RE: SOIL REMEDIATION AND MONITORING WELL INSTALLATION PLANS - SUNOL PUMP STATION, 505 PALOMA WAY, SUNOL

Dear Mr. Mazza:

I have consulted with the San Francisco Bay Regional Water Quality Control Board (RWQCB) regarding the need to apply risk-based cleanup criteria at the referenced site. Dr. Ravi Arulanantham of the RWQCB has concluded that the magnitude of any residual soil contamination at the site would not warrant a detailed risk assessment.

Therefore, based on the aforementioned RWQCB determination and a January 17, 1995 conversation with Mr. Ben Swann (CDM), the July 19, 1994 Camp, Dresser & McKee, Inc. (CDM) soil remediation and monitoring well installation work plan has been accepted with the following minor revisions:

1) The number and location of final confirmatory soil samples collected from the resulting excavation should be significantly based on what is observed in the field during excavation, and on analytical data from previous phases of work at the site (e.g., soil borings).

At a minimum, the collection of four (4) or more bottom samples and at least one (1) sidewall sample from each wall of the excavation (\sim 1 per 20 ft²), targeting former "hot" areas, would appear appropriate.

2) All final soil samples should also be analyzed for BTEX, in addition to method 418.1 and TPH-D analyses as proposed.

Additionally, PNA analyses should also be performed not only on final samples collected from the excavation's base, but also on that (those) sidewall sample(s) collected proximal to the location of the former waste oil UST.

3) Once the locations of the monitoring wells have been determined and the wells constructed, ground water samples should also be analyzed for the presence of PNAs, in addition to the target analytes proposed (TPH-D and BTEX).

Mr. Paul Mazza

RE: Sunol Pump Plant, 505 Paloma Way, Sunol

January 18, 1995

Page 2 of 2

Please incorporate the final well placement proposal into the report presenting the results of the excavation activities.

Please contact this office when field work has been scheduled, or if there should be any questions. I may be reached at 510/567-6783.

Sincerely,

\$cott/Ø. Seery, CHMM

Senida Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director

Gil Jensen, Alameda County District Attorney's Office

Ravi Arulanantham, RWQCB

Ed Laudani, Alameda County Fire Department

Kevin Tinsley, ACDEH

Bob Hickman, SFWD, P.O. Box 730, Millbrae, CA 94030

Ben Swann, Camp, Dresser & McKee

pump station

State of California

Memorandum

To:

Scott Seery

Senior Haz. Mat. Specialist Dept. of Environmental Health

County of Alameda

Date: September 17, 1994

TEL:(510) 286-1331 CALNET: 541-1331

FAX: (510) 286-1380 CALNET: 541-1380 DATA: (510) 286-0404

(BBS) CALNET: 541-0404

Ravi Arulanantham 2...
Staff Toxicologist

From:

REGIONAL WATER QUALITY CONTROL BOARD

San Francisco Bay Region 2101 Webster St., Suite 500

Oakland, CA 94612

Subject:

Soil Cleanup Levels

San Francisco Water Department, Sunsi Pump Station, Sunsi, Alameda County

This memo is to confirm the substantive points discussed recently at your office between Kevin Graves of the RWQCB, myself and you. The 100 Mg/Kg of soil remediation goal proposed by the SF Water Department, in my opinion is a "manageable goal" for the site specific conditions and potential risks described in the report. In a strict manner we cannot call the 100 mg/kg of soil level as a risk-based cleanup level, because the threat to current and future water quality (degradation of water quality) as well as the public health effects (consumption of drinking water) have not been integrated together either by conducting leachability studies or modelling the attenuation and dilution in the aquifer and finally estimating the exposure point concentration (at the tap). Although this is in a sensitive area, the magnitude of this problem does not warrant a detail risk assessment; it is not cost-effective due to the limited risk posed by this site.

In addition, our experience have shown that a 100 mg/kg of soil cleanup goal for petroleum hydrocarbons, in most cases is adequately conservative for both protection of human health and water quality.

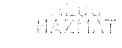
c: Kevin Graves, RWQCB-II

City and County of San Francisco

Maintenance Pard







94 AUG 19 PH 3:51

August 12, 1994

Scott Seery
Alameda County Health Care Services Agency
Department of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

Subject: : Notification

Dear Mr. Seery:

Thank you for your recent notification that the San Francisco Water Department (SFWD) had not completed a required ground water sampling program at our **Sunol Maintenance Yard**. Now that we have been reminded of this oversight, we will expedite completion of the program. SFWD, or its consultants, will be contacting you about how to best proceed in this matter.

There was some confusion at SFWD following receipt of a copy of your May 27, 1994 letter. Also, unfortunately, there was some communication difficulty between San Francisco departments. In the future, when the Alameda Department of Environmental Health writes to anybody with reference to SFWD property, I would appreciate a copy of your document. As Environmental Manager for SFWD, it is my responsibility to address problems such as you raised in your letter. If I am copied, I will know there is a concern and I can assure that your requests are directed to the appropriate personnel.

In addition, should you wish to discuss such matters prior to writing a letter, I would appreciate a call at 415-871-2027.

Thank you for your cooperation.

Sincerely,

Robert B. Hickman, Manager

Envrionmental & Regulatory Affairs

cc.: Ravi Arulanantham John Mullane Cheryl Davis Leo Bauer Paul Mazza

FILE

ach89 [HICKMAN 5.5]



environmental engineers, scientists, planners, & management consultants

August 10, 1994

CAMP DRESSER & McKEE INC.

One Walnut Creek Center 100 Pringle Avenue, Suite 300 Walnut Creek, California 94596 510 933-2900, Fax: 510 933-4174

Mr. Paul Mazza San Francisco Water Department 1000 El Camino Real Millbrae, California 94030

Subject:

Review of Groundwater Investigation Reports

San Francisco Water Department Sunol Maintenance Yard

505 Paloma Way Sunol, California

Dear Mr. Mazza:

Following your request Camp Dresser and McKee (CDM) has reviewed groundwater investigation and monitoring reports prepared for the San Francisco Water Department's Sunol Maintenance Yard in Sunol, CA. This request was made following notification from the Alameda County Health Department to the City that required groundwater monitoring reports had not submitted.

As a brief background, three underground fuel storage tanks were removed from the site in 1990 and soil contamination (primarily oil) associated with two other areas was excavated and removed from the site. Three groundwater monitoring wells were installed to assess the impact of the contamination on groundwater in 1991. Subsequent sampling by Harding Lawson Associates in 1991 and quarterly sampling by Crosby & Overton in 1992, evidenced non-detectable levels of contaminants in the three groundwater monitoring wells. Apparently, Alameda County did not received the last quarterly sampling report (attached) issues by Crosby and Overton.

Concern has been raised that the groundwater monitoring wells were not adequately placed to detect groundwater contamination at the site. CDM has reviewed the groundwater flow monitoring data compiled by Crosby & Overton (see attached report) and concludes from this information that if significant groundwater contamination were present, it would be detectable in monitoring well MW-1 which is sufficiently downgradient from the removed tanks.

Based upon the information reviewed, CDM recommends that Alameda County review the site for final closure.

Mr. Paul Mazza San Francisco Water Dept. August 10, 1994 Page 2

If you have any questions regarding the content of this letter please call Jeff Willett or myself at (510) 933-2900.

Sincerely,

CAMP DRESSER & McKEE INC.

Ben Swann, R.G. Hydrogeologist

Attached: Crosby and Overton Fourth Quarter Report

cc: Mr. Scott Seery, Alameda County Health

Ms. Elaine Casey Warren, Office of the City Attorney

Mr. John Roddy, Office of the City Attorney

Mr. Willy Tsai, Water Department

AGENCY

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

STID 3118

July 22, 1994

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

Ravi Arulanantham, PhD., CHMM California Regional Water Quality Control Board San Francisco Bay Region 2101 Webster Street, Ste. 500 Oakland, CA 94612

RE: SAN FRANCISCO WATER DEPARTMENT, SUNOL 100, 505
PALOMA WAY, SUNOL, ALAMEDA COUNTY: ESTABLISHMENT OF RISKBASED CLEANUP LEVELS

Dear Dr. Arulanantham:

This letter follows our telephone conversation on July 20th during which we discussed the potential applicability of human health-based risk assessment to aid in the establishment of appropriate cleanup levels for soil contaminated from underground storage tank (UST) release(s) at the referenced subsite. The county requests your assistance in determining whether such a risk assessment is warranted.

Attached please find copies of background documents, including, but not necessarily limited to:

- o July 19, 1994 Camp, Dresser & McKee (CDM) Remediation and Groundwater Monitoring of Former UST Location, Sunol Pump Plant (complete)
- o March 1994 CDM UST removal report (excerpts)
- o August 1993 CDM Report of Soil Boring Assessment at Sunol Pump Station (complete)
- o Tabulation of UST closure soil sample results

Please be aware that this subsite is located at the head of Niles Canyon within a portion of the Sunol ground water subbasin, directly proximal to the confluence of Alameda Creek and Arroyo de la Laguna, a tributary to Alameda Creek. This alluvial basin is an area where percolation and infiltration of irrigation water, precipitation, and stream flow provide significant recharge to the underlying aquifer. Water destined for domestic use is periodically extracted at the Sunol filter gallery, which the subject pump plant serves. Effluent flow into Alameda Creek helps to recharge ground water reservoirs underlying the Niles cone at its apex in the vicinity of the Niles district of Fremont.

Dr. Arulanantham

RE: SFWD, 505 Paloma Way, Sunol

July 22, 1994 Page 2 of 2

I understand that you will require approximately 2 weeks to evaluate these data. Please call me at 510/337-2853, or -2866, should you have any questions or care to discuss this case during the course of your evaluation.

Sincerely

Sectt O. Seery, CHMM

Sentor Hazardous Materials Specialist

attachments

cc: Rafat A. Shahid, Assistant Agency Director

Gil Jensen, Alameda County District Attorney's Office

Kevin Graves, RWQCB Paul Mazza, SFWD Ben Swann, CDM ALAMEDA COUNTY - ENVIRONMENTAL HEALTH - HAZARDOUS MATERIALS DIVISION

MEMORANDUM

DATE: July 22, 1994

TO: Kevin Tinsley

FROM: Scott Seery

SUBJ: contact for San Francisco Water Department (SFWD) sites

located in Sunol

I spoke with Paul Mazza of SFWD today regarding environmental issues associated with a few of the sites in Sunol. He requested that <u>ALL</u> correspondence regarding any of the SFWD facilities also be copied to:

Bob Hickman SFWD P.O. Box 730 Millbrae, CA

SFWD is working hard to streamline their agencies so that there is a single unifying person accountable for all issues, whether they be related to material storage compliance, waste storage, or environmental projects.

c: TP

AL

-pump station -7/22/94

Scott

ALCO HAZMAT

94 JUL 22 All B: 44

Ben Freden faxed your May 27th letter to me yesterday. I was on vacation May 23 thur pine 6. appaintly my boss intercepted it and sent it to the asit manager of the alameda yard. He tells me, he sent it to save wells, and you probably can guess the rest. This facility (505 Palona - Waint, yard) isn't my responsability or under my authority, but if you give me a week a two s'ell resolve all of the outstanding issues; I'll probably be fixed to king in COM. This is what wiel take a couple weeks to Swance: In the mean time Ill try to track down all available réputs, etc. Plesse page me at leure your no. after the peep), so we can work thouls

aul Marzo S.F. W010 ph. Was a second

Maintenance Yard

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

STID 3118

May 27, 1994

Mr. David Wells
City and County of San Francisco
Department of Public Health
Toxics and Safety Services
101 Grove Street
San Francisco, CA 94102

RE: SUNOL MAINTENANCE YARD, 505 PALOMA WAY, SUNOL

Dear Mr. Wells:

It has come to our attention that reports documenting the results of the ongoing ground water investigation at the referenced Alameda County site have not been submitted to this office since our receipt of the December 2, 1992 Crosby & Overton monitoring report. Hence, no reports have been submitted for all of 1993 and the first quarter of 1994. Please be advised that this is a violation of Section 2652(d) of Title 23, California Code of Regulations.

Your attention is directed towards the August 16, 1991 and January 22, 1992 correspondence from this office in which, among other topics discussed, it is requested that such technical reports be submitted on a quarterly basis. Copies of the cited letters are attached for your review.

Please submit all sampling and monitoring reports for the referenced site within 30 days of the date of this letter.

Please be advised that this letter constitutes a request for technical reports pursuant to California Water Code Section 13267(b).

I may be reached at 510/271-4530 should you have any questions.

Sincerely,

Scott O. Seery, CHMM

Sénior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director

Gil Jensen, Alameda County District Attorney's Office

Ed Laudani, Alameda County Fire Department

Paul Mazza, SFWD

Ronald Krzyzanowski, SFWD

pump station

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

STID 3118

Mar. 27 1004

May 27, 1994

Mr. Ronald Krzyzanowski
City and County of San Francisco
Department of Public Works
Bureau of Environmental Regulation & Management
Bayview Plaza
3801 Third Street, Ste. 600
San Francisco, CA 94124

RE: SUNOL PLATE STATION, 505 PALOMA WAY, SUNOL

Dear Mr. Krzyzanowski:

This office is in receipt and has completed review of the March 1994 Camp, Dresser & McKee Inc. (CDM) Sunol Pump Station Underground Storage Tank Removal Report, as submitted under CDM cover dated March 10, 1994, and the August 1993 CDM Report of Soil Boring Assessment at Sunol Pump Station, Alameda County, California, submitted as an enclosure within the cited March 1994 CDM closure report. The cited reports document that a release of fuel and non-fuel hydrocarbons has impacted both soil and ground water encountered at this site.

Please be advised that the San Francisco Bay Regional Water Quality Control Board (RWQCB), and the Corrective Action Regulations, Article 11, Title 23, California Code of Regulations (CCR), require additional environmental investigations to be performed when unauthorized releases are discovered. The initial investigation is in the form of a **Preliminary Site Assessment**, or PSA. The information gathered by the PSA is used to determine the extent of the environmental impact resulting from the release, and whether further assessment or cleanup are necessary. A PSA must be conducted in accordance with the RWQCB <u>Staff</u> <u>Recommendations for the Initial Evaluation and Investigation of Underground Tanks</u>, the State Water Resources Control Board (SWRCB) <u>Leaking Underground Fuel Tank (LUFT) Field Manual</u>, and Article 11 of 23CCR.

A PSA is required at this site.

In order to proceed with a PSA, you should obtain the professional services of a reputable environmental consultant. Your responsibility is to have the consultant submit a PSA work plan outlining planned activities pertinent to meeting the criteria described in the referenced guidance documents. These criteria are broadly outlined in the attached Appendix A from the RWQCB.

Mr. Ronald Krzyzanowski RE: Sunol Pump Station, 505 Paloma Way, Sunol May 27, 1994 Page 2 of 3

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

The PSA work plan is due within 45 days of the date of this letter, or by July 11, 1994. Work should commence no later than 30 days following work plan approval.

A report must be submitted within **45 days** of the completion of field activities associated with this phase of work at the site. Subsequent reports are to be submitted **quarterly** until this site qualifies for final RWQCB "sign off."

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

- o Details and results of <u>all</u> work performed during the designated reporting period: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed (including QA/QC data), tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of ground water contamination and characterization
- o Interpretation of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target compound, geologic cross sections, etc.
- o Recommendations for additional work

All reports and proposals must be submitted under seal of a California-registered geologist or civil engineer with the appropriate environmental background. Please include a statement of qualifications for each lead professional involved with this project.

Mr. Ronald Krzyzanowski RE: Sunol Pump Station, 505 Paloma Way, Sunol May 27, 1994 Page 3 of 3

Please find attached the State Water Resources Control Board (SWRCB) notification form to be used for notifying the SWRCB of the release at this subsite. Please supply the information requested in this notification form and return to this office within 15 days, should one not have been submitted previously.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Failure to respond may result in the referral of this case to the RWQCB or other appropriate agency for enforcement action.

Please feel free to call me at 510/271-4530, should you have any questions.

Sincerely,

Scott O. Seery, CHMM

Senior Hazardous Materials Specialist

attachments

CC: Rafat A. Shahid, Assistant Agency Director, Env. Health Gil Jensen, Alameda County District Attorney's Office Ed Laudani, Alameda County Fire Department Kevin Tinsley, ACDEH Paul Mazza, SFWD



Contact: Jeff Wilett

Title:

Signature:

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page 1 of 2



ALAMEDA COUNTY, DEPARTMENT OF **ENVIRONMENTAL HEALTH**

Hazardous Materials Inspection Form

80 Swan Way, #200 Oakland, CA 94621 (415) 271-4320

11,111

****			Site Site STUD - Sunol purpo Today's 16,93
II.A	BUSINESS PLANS (Title 19)		
	1. immediate Reporting 2. Bus. Plan Stats. 3. RR Cars > 30 days 4. inventory Information 5. Inventory Complete 6. Emergency Response 7. Training 8. Deficiency 9. Modification	2703 25503(b) 25503.7 25504(a) 2730 25504(b) 25504(c) 25605(a) 25605(b)	Site Address 505 Patoma Way City Suno Zip 94576 Phone MAX AMT stored > 500 lbs, 55 gal., 200 cft.? Inspection Categories:
II R	ACUTELY HAZ. MATLS		I. Haz. Mat/Waste GENERATOR/TRANSPORTER
	to. Registration Form Filed 11. Form. Complete 12. RMPP Contents 13. Implement Sch. Regid? (Y/N)	25533(a) 25533(b) 25534(c) 25524(c)	II. Business Plans, Acute Hazardous Materials III. Underground Tanks
	14. OffSite Conseq. Assess. 15. Probable Risk Assessment 16. Persons Responsible 17. Certification 18. Exemption Request? (Y/N) 19. Trade Secret Requested?	25534(d) 25534(g) 25534(j) 25536(b) 25538	Calif. Administration Code (CAC) or the Health & Safety Code (HS&C) Comments:
III. I	UNDERGROUND TANKS (Title	23)	these UST. Anthony Rocha (ACFD) elicket
General	1. Permit Application 2. Pipeline Leak Detection 3. Records Maintenance 4. Retease Report 5. Closure Plans	25284 (H&S) 25292 (H&S) 2712 2651 2670	upon my arrival. After breaking away the
Monitoring for Existing Tanks	6. Meithod 1) Monthly Test 2) Daily Vadose Serni-annual gnawater One time soils 3) Daily Vadose One time soils Annual tank test 4) Monthly Gnawater One time soils 5) Daily Inventory Annual tank testing Cont pipe leak det Vadose/gnawater mon. 6) Daily Inventory Annual tank testing Cont pipe leak det 7) Weeldy Tank Gauge Annual Tank Gauge Annual Tank Testing Daily Inventory 9) Other	*	approximately its waitline down. The tank was lifted from the excavation. Water/product was do served collecting in the concrete "trough" formed by the UST invert at the twest end of the pit, effectively contained within it. The tank was loaded onto a truck operated by Erickson and transported off-site.
		2643 2644 2646 2647	This UST and The other two removed praisonsly. Only boring BH-4
New Tanks	11.Monitor Plan 12.Access. Secure 13.Plans Submit Date: 14. As Bult Date:	2632 2634 2711 2635	drilled between the diesel tank and the other two exhibited detectable contamination @ 15 BG (TPH-D-90ppm; TOG-400ppm).
Rev	6/88		investigation
	,		

Inspector:

Signature:

page 2 of 2

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Title:

Signature:

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200 Oakland, CA 94621 (415) 271-4320

Hazardous Materials Inspection Form

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			—Site Site $\langle F(t) \rangle - \langle f(t) \rangle$ Today's
L	BUSINESS PLANS (Title 19)		Site Site Name SFWD-Sund pump Today
	1. Immediate Reporting 2. Bus. Plan Stds. 3. RR Cars > 30 days 4. Inventory Information 5. Inventory Complete 6. Emergency Response 7. Training 8. Deficiency 9. Modification	2703 25503(b) 25503.7 25504(c) 2730 25504(b) 25504(c) 25505(d) 25505(b)	Site Address 505 Palona Way City Scinal Zip 945% Phone MAX AMT stored > 500 lbs, 55 gal., 200 cft.? Inspection Categories:
11.B	ACUTELY HAZ MATLS 10. Registration Form Filed 11. Form Complete 12. RMPP Contents 13. Implement Sch. Regid? (Y/N) 14. OffSite Conseq. Assess.	25524(c)	I. Haz. Mat/Waste GENERATOR/TRANSPORTERII. Business Plans, Acute Hazardous Materials III. Underground Tanks * Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)
	15. Probable Risk Assessment 16. Persons Responsible 17. Certification 18. Exemption Request? (Y/N) 19. Trade Secret Requested?	25534(d) 25534(g) 25534(f) 25536(b) 25538	Comments: Sidewall samples were collected from both ends and as
111.	UNDERGROUND TANKS (Title	23)	each tlank of the UST.
General	1. Permit Application 2. Pipeline Leak Detection 3. Records Maintenance 4. Release Report 5. Closure Plans	25284 (H&S) 25292 (H&S) 2712 2651 2670	
Monitoring for Existing Tenks			A full diesel suite will be parformed (TPH-D/BTEX) Note: Please provide a copy of the cited CDM pre-closure report once in final form.
	8. Inventory Rec. 9. Soil Testing	2643 2644 2646 2647	
New Tanks	13.Plans Submit Date:	2632 2634 2711 2635	
Rev ·	6/68		
	Contact:	Jeff C	Wilett II, III

Inspector:

Signature:

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ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

80 Swan Way, #200 Oakland, CA 94621 (415) 271-4320

11,111

3666	***************************************		Site Site SFWD-Pumping Dut Toda
II.A	BUSINESS PLANS (Title 19) 1. Immediate Reporting 2. Bus. Plan Stas. 3. RR Cars > 30 days 4. Inventory Information 5. Inventory Complete 6. Emergency Response	2703 25503(b) 25503.7 25504(d) 2730 25504(b)	Site Address 505 Paloma Wky City Sand Zip 94586 Phone
	7. Training 8. Deficiency 9. Modification	25504(c) 25505(c) 25505(b)	MAX AMT stored > 500 lbs, 55 gal., 200 cft.? Inspection Categories:
II.B	ACUTELY HAZ, MAT'LS		I. Haz. Mat/Waste GENERATOR/TRANSPORTER JL Business Plans, Acute Hazardous Materials
	10. Registration Form Filed 11. Form Complete 12. RMPP Contents 13. Implement Sch. Regid? (Y/N	25533(a) 25533(b) 25534(c)	III. Underground Tanks
	14. OffSite Conseq. Assess. 15. Probable Risk Assessment 16. Persons Responsible 17. Certification	25524(c) 25534(d) 25534(g) 25534(j)	Callf. Administration Code (CAC) or the Health & Safety Code (HS&C)
		25536(b) 25538	Comments: On-site to do serve (attempted) closure of 3 USTs.
III.	UNDERGROUND TANKS (Title	23)	I was met on site by Geoff Chan and George Wilson
General	1. Permit Application 2. Pipeline Leak Detection 3. Records Maintenance 4. Release Report	25284 (H&S) 25292 (H&S) 2712 2651	of SFOPW, Bureau of Ehu. Reg. = Mnant.
Monitoring for Existing Tanks		2643 2644 2646 2647	difficulty; both appeared intact with two avapping significantly in place. A single sample was collected from each tankpit. Analyze for the following target compounds: waste oil-HWC, BTEX, SVOC (8270) TPH-D/-G, TOG, matal; lube oil-TBC The 10,000 diesal tank was encased in concrete along its lower half. This concrete will be broken up to free the tank next week. Sampling will likely
e New Tanks	11.Monitor Plan 12.Access. Secure 13.Access. Secure 13.Access. Secure Date: 14. As Built Date:	2632 2634 2711 2635	Evidence of overspillage was discovered along the top and sides of this fact.
	Contact: E	/	242anowski Caardinatar Inspector: 5. 155

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY DI RIMENT OF ENVIRONMENTAL HEALTH RTMENT OF ENVIRONMENTAL HEALTH HAZARDOUS MATERIALS DIVIS 80 SWAN WAY, ROOM 200 OAKLAND, CA 94621

PHONE NO. 510/271-4320

UNDERGROUND TANK CLOSURE PLAN Complete according to attached instructions *

	Business Name City and County of S	an Francisco	Sunci Pump Station
l.	Business Name City and County of B		- 124. SEL - 14 - 155 1
	Business Owner City and County of S	an Francisco)
2.	Site Address -5555 Calaveras Road	505 talo	ma Way
	City Sunol	Sip ⁹ 4586	Phone 415-872-5939
3.	Mailing Address P.O. Box 730		
	CityMillbrae	Zip 94030	Phone ⁵ 10-862-2989
4.	Land Owner City and County of San	Francisco	
	Address P.O. Box 730 City	y, State Mill	brae, CA Zip ⁹ 4030
5.	. Generator name under which tank wil	l be manifest	ted
С	City and County of san Francisco Wat	er Departme	nt (SFWD)
	EPA I.D. No. under which tank will		

6.	Contractor L. & W. Environmental Scriber
	2111 Jennings Street
	Address
	License Type general engineeing ID# 507442
	*Effective January 1, 1992, Business and Professional Code Section 7058.7 requires prime contractors to also note Hazardous Waste Certification issued by the State Contractors License Board. Indicate that the certificate has been received, in addition, to holding the appropriate contractors license type.
7.	Consultant _ Camp Dresser and McKee, Inc. (CDM)
	Address 100 Pringle Avenue, #100
	City Walnut Creek, CA Phone 510-933-2900
8.	Contact Person for Investigation Title Vice President
	Name George Wilson Title Vice President
	Phone (415) 822-4555
	Number of tanks being closed under this plan
10.	instructions).
	** Underground tanks are hazardous waste and must be handled ** as hazardous waste
	a) Product/Residual Sludge/Rinsate Transporter
	Name Waste Oil Recovery EPA I.D. No. CAD000626515
	Hauler License No. 843 License Exp. Date 7/94
	Address 6401 Leona Street
	city Oakland State CA Zip 94605
	City Oakland
	b) Product/Residual Sludge/Rinsate Disposal Site
	Name Deminno Kerdoon EPA I.D. No. CAT080013352
	Address2000 North Alameda
	City Compton State CA Zip 90222

c) Tank and Piping Hambeoteer	
Name Erickson Trucking	EPA I.D. No. CAD009466362
Hauler License No. 0019	License Exp. Date5/94
Address255 Oarr Boulevard	
City Richmond	State <u>CA</u> Zip 94806
d) Tank and Piping Disposal Site	CAD009466362
Name Erickson, Inc.	EPA I.D. No. CAD009400302
Address 255 Parr Boulevard	
City Richmond	State CA Zip 94806
11. Experienced Sample Collector	
Name <u>Sergio Salas or Eddie Reye</u>	S
Company L & W Environmental Serv	ices, Inc.
Address 2111 Jennings Street	
city San Francisco State CA	Zip 94124 Phone 415-822-4555
12. Laboratory	
Name Precision Analytical Labora	tory #
Address 4136 Lakeside Drive	
City Richmond St	ate <u>CA</u> Zip <u>94806</u>
State Certification No. 211	
13. Have tanks or pipes leaked in the p	east? Yes [] No [X]
If yes, describe	
	-

14. Describe methods to be used for rendering tank inert

Tanks emptied and purged with CO2. Minimum of 15 lbs. dry ice per 100

gallon tank size. Two 'ABC' ten pound fire extinguishers will be

avialable on site for emergency purposes.

Before tanks are pumped out and inerted, all associated piping must be flushed out into the tanks. All accessible associated piping must then be removed. Inaccessible piping must be plugged.

The Bay Area Air Quality Management District (771-6000), along with local Fire and Building Departments, must also be contacted for tank removal permits. Fire departments typically require the use of explosion proof combustible gas meters to verify tank inertness. It is the contractor's responsibility to bring a working combustible gas meter on site to verify tank inertness.

15. Tank History and Sampling Information

Ta	nk	Material to	Location and
Capacity	Use History (see instructions)	be sampled (tank contents, soil, ground- water, etc.)	Depth of Samples
10000	Diesel	soil	under both ends and middle of tank at the soil backfill interface into 2' of native soil.
400	waste oil	soil	under tank at the soil backfill interface into 2' of native soil
400	lubercating oil	soil	under tank at the soil backfill interface into 2' of native soil

One soil sample must be collected for every 20 feet of piping that is removed. A ground water sample must be collected should any ground water be present in the excavation.

	Excavated/Stockpiled Soil	
Stockpiled Soil	Sampling Plan	
Volume (Estimated)	Three grab samples taken, one each at each end of tank and middle of tank at 2' below tank for 10000 gallon tank. one sample taken for each	
100 yards	400 gallon tank at 2' below tank. One composite staken for each stockpile. Total of 8 samples to be collected Water samples taken if	
The sale sale state of the	groundwater is encountered. To reuse soil of are to be based on expected disposition of soil. To reuse soil of	ر اجزاء الحد

stack pile sampling Control are to be have the sample for the requirements, a discrete sample for the 20 years is required; believed plastic and must be stockpiled soil must be placed on bermed plastic and must be completely covered by plastic sheeting.

16. Chemical methods and associated detection limits to be used for analyzing samples

The Tri-Regional Board recommended minimum verification analyses and practical quantitation reporting limits should be followed. See attached Table 2.

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit
Diesel, waste oil, waste oil, soil oil soil osamples	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~		1.0 ppm 1.0 ppm .005 ppm
	$_{\mathcal{G}}$	Method 17 edition 5520 D & F Cl HC EPA 8240 or	50 ppm
water sampl if encountered	es 🌣	GCFID EPA 5030 TPH as Diesel GCFID EPA (3510)	50 ppb
		BTX & E EPA 602 or 624 FOG 17 edition 5520 C & F CL HC EPA 601 or 6	.3 ppb 5000 ppb 24

17. Submit Site Health and Safety Plan (See Instructions)

18. Submit Worker's Compensation Certificate copy

Name of Insurer Republic Indemnity Insurance

- 19. Submit Plot Plan (See Instructions)
- 20. Enclose Deposit (See Instructions)
- 21. Report any leaks or contamination to this office within 5 days of discovery. The report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report form. (see Instructions)
- 22. Submit a closure report to this office within 60 days of the tank removal. This report must contain all the information listed in item 22 of the instructions.

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 Safety and Health Administration) requirements concerning personnel health and safety. 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.

Once I have received my stamped, accepted closure plan, I will contact the project Hazardous Materials Specialist at least three working days in advance of site work to schedule the required inspections.

Name (please type) George Wilson
Wall (2)
Signature /
Date 8 6 93
Signature of Site Owner or Operator
Name (please type) City and County of San Francisco
Name (please type) Clt and I
Signature Paul MM augus
Date July 28, 1893

Signature of Contractor

18. Submit Worker's Coppensation Certificate copy

Name of Insurer Republic Indemnity Insurance

- 19. Submit Plot Plan (See Instructions)
- 20. Enclose Deposit (See Instructions)
- 21. Report any leaks or contamination to this office within 5 days of discovery. The report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report form. (see Instructions)
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Once I have received my stamped, accepted closure plan, I will contact the project Hazardous Materials Specialist at least three working days in advance of site work to schedule the required inspections.

Signature of Contractor	
Name (please type) George Wilson	<u>.</u>
Signature Signature	
Date 8/6/93	
Signature of Site Owner or Operator	
Name (please type) City and County of San Francisco	
Signature Haul Many	
Date July 28, 1893	

INSTRUCTIONS

General Instructions

- * Three (3) copies of this plan plus attachments and deposit must be submitted to this Department.
- * Any cutting into tanks requires local fire department approval.
- * One complete copy of your approved plan must be at the construction site at all times; a copy of your approved plan must also be sent to the landowner.

Item Specific Instructions

- 2. <u>SITE ADDRESS</u>
 Address at which closure is taking place.
- 5. <u>EPA I.D. NO. under which the tanks will be manifested</u>
 EPA I.D. numbers may be obtained from the State Department of
 Health Services, 916/324-1781.
- 6. <u>CONTRACTOR</u>
 Prime contractor for the project.
- 10. STATE REGISTERED HAZARDOUS WASTE TRANSPORTERS/FACILITIES
 - a) All residual liquids and sludges are to be removed from tanks before tanks are inerted.
 - c) Tanks must be hauled as hazardous waste.
 - d) This is the place where tanks will be taken for cleaning.
- 15. TANK HISTORY AND SAMPLING INFORMATION

 Use History This information is essential and must be accurate.

 Include tank installation date, products stored in the tank, and the date when the tank was last used.

Material to be sampled - e.g. water, oil, sludge, soil, etc.

Location and depth of samples - e.g. beneath the tank a maximum of two feet below the native soil/backfill interface, side wall at the high water mark, etc.

16. CHEMICAL METHODS AND ASSOCIATED DETECTION LIMITS See attached Table 2. 17. SITE HEALTH AND SAFETY PLAN A site specific Health and Safety plan must be submitted. advocate the site health and safety plan include the following items, at a minimum: a) The name and responsibilities of the site health and safety officer: b) An outline of briefings to be held before work each day to appraise employees of site health and safety hazards; c) Identification of health and safety hazards of each work task. Include potential fire, explosion, physical, and chemical hazards; identify the action levels (contaminant d) For each hazard, concentrations in air) or physical conditions which will trigger changes in work habits to ensure workers are not exposed to unsafe chemical levels or physical conditions; e) Description of the work habit changes triggered by the above action levels or physical conditions; f) Frequency and types of air and personnel monitoring - along with the environmental sampling techniques and instrumentation - to be used to detect the above action levels. Include instrumentation maintenance and calibration methods and frequencies; g) Confined space entry procedures (if applicable); h) Decontamination procedures; i) Measures to be taken to secure the site, excavation and stockpiled soil during and after work hours (e.g. barricades, caution tape, fencing, trench plates, plastic sheeting, security guards, etc.); j) Spill containment/emergency/contingency plan. Be sure to include emergency phone numbers, the location of the phone nearest the site, and directions to the hospital nearest the site; k) Documentation that all site workers have received the appropriate OSHA approved trainings and participate in appropriate medical surveillance per 29 CFR 1910.120; and 1) Page for employees to sign indicating they have read and will comply with the site health and safety plan. The safety plan must be distributed to all employees and contractors working in hazardous waste operations on site. A complete copy of the site health and safety plan along with any standard operating procedures shall be on site and accessible at all times. - 8 rev 3/92

NOTE: These remirements are <u>excerpts</u> from 29 CFR Part 1910.120(b)(4), Hazardous Waste Operations and Emergency Response; Final Rule, March 6, 1989. Safety plans of certain underground tank sites may need to meet the <u>complete</u> requirements of this Rule.

- 19. PLOT PLAN
 The plan should consist 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 Lines;
 - d) Location of all Structures;
 - e) Location of all relevant existing equipment including tanks and piping to be removed and dispensers;
 - f) Streets;
 - g) Underground conduits, sewers, water lines, utilities;
 - h) Existing wells (drinking, monitoring, etc.);
 - i) Depth to ground water; and
 - j) All existing tanks and piping in addition to the ones being pulled.
- 20. <u>DEPOSIT</u>
 A deposit, payable to Alameda County for the amount indicated on the Alameda County Underground Storage Tank Fee Schedule, must accompany the plans.
- 21. Blank Unauthorized Leak/Contamination Site Report forms may be obtained in limited quantities from our office and from the San Francisco Bay Regional Water Quality Control Board (415/464-1255). Larger quantities may be obtained directly from the State Water Resources Control Board at (916) 739-2421.
- 22. TANK CLOSURE REPORT
 The tank closure report should contain the following information:
 - a) General description of the closure activities;
 - Description of tank, fittings and piping conditions. Indicate tank size and former contents; note any corrosion, pitting, holes, etc.;

- c) Description of the excavation itself. Include the tank and excavation depth, a log of the stratigraphic units encountered within the excavation, a description of root holes or other potential contaminant pathways, the depth to any observed ground water, descriptions and locations of stained or odor-bearing soil, and descriptions of any observed free product or sheen;
- d) Description of sampling methods;
- e) Description of any remedial measures conducted at the time of tank removal;
- f) To-scale figures showing the excavation size and depth, nearby buildings, sample locations and depths, and tank and piping locations. Include a copy of the plot plan prepared for the Tank Closure Plan under item 19;
- g) Chain of custody records;
- h) Copies of signed laboratory reports;
- i) Copies of "TSDF to Generator" Manifests for all hazardous wastes hauled offsite (sludge, rinsate, tanks and piping, contaminated soil, etc.); and
- j) Tabulation of the volume and final destination of all nonmanifested contaminated soil hauled offsite.

TABLE #2 RECOMMENDED MINIMUM VERIFICATION ANALYSES FOR UNDERGROUND TANK LEAKS

HYDROCARBON LEAK	SOIL ANALYSIS	WATER ANALYSIS
Unknown Fuel	TPH G GCFID(5030) TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH G GCFID(5030) TPH D GCFID(3510) BTX&E 602, 624 or 8260
Leaded Gas	TPH G GCFID(5030) BTX&E 8020 OR 8240 TPH AND BTX&E 8260 TOTAL LEAD AA	TPH G GCFID(5030) BTX&E 602 or 624 TOTAL LEAD AA
	TEL DHS-LUFT EDB DHS-AB1803	TEL DHS-LUFT EDB DHS-AB1803
Unleaded Gas	TPH G GCFID(5030) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH G GCFID(5030) BTX&E 602, 624 or 8260
Diesel, Jet Fuel and Kerosene	TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH D GCFID(3510) BTX&E 602, 624 or 8260
Fuel/Heating Oil	TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH D GCFID(3510) BTX&E 602, 624 or 8260
Chlorinated Solvents	CL HC 8010 or 8240 BTX&E 8020 or 8240 CL HC AND BTX&E 8260	CL HC 601 or 624 BTX&E 602 or 624 CL HC AND BTX&E 8260
Non-chlorinated Solvents	TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH D GCFID(3510) BTX&E 602 or 624 TPH and BTX&E 8260
Waste and Used Oil or Unknown (All analyses must be completed and submitted)	TPH G GCFID(5030) TPH D GCFID(3550) TPH AND BTX&E 8260 O & G 5520 D & F BTX&E 8020 or 8240	TPH G GCFID(5030) TPH D GCFID(3510 O & G 5520 C & F BTX&E 602, 624 or 8260
	CL HC 8010 or 8240	CL HC 601 or 624
	ICAP or AA TO DETECT MI METHOD 8270 FOR SOIL OI PCB* PCP* PNA CREOSOTE	ETALS: Cd, Cr, Pb, Zn, Ni R WATER TO DETECT: PCB PCP PNA CREOSOTE

^{*} If found, analyze for dibenzofurans (PCBs) or dioxins (PCP)

Reference: Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, 10 August 1990

EXPLANATION FOR TABLE #2: MINIMUM VERIFICATION ANALYSIS

- 1. OTHER METHODOLOGIES are continually being developed and as methods are accepted by EPA or DHS, they also can be used.
- 2. For DRINKING WATER SOURCES, EPA recommends that the 500 series for volatile organics be used in preference to the 600 series because the detection limits are lower and the QA/QC is better.
- 3. APPROPRIATE STANDARDS for the materials stored in the tank are to be used for all analyses on Table #2. For instance, seasonally, there may be five different jet fuel mixtures to be considered.
- 4. To AVOID FALSE POSITIVE detection of benzene, benzene-free solvents are to be used.
- 5. TOTAL PETROLEUM HYDROCARBONS (TPH) as gasoline (G) and diesel (D) ranges (volatile and extractible, respectively) are to be analyzed and characterized by GCFID with a fused capillary column and prepared by EPA method 5030 (purge and trap) for volatile hydro- carbons, or extracted by sonication using 3550 methodology for extractable hydrocarbons. Fused capillary columns are preferred to packed columns; a packed column may be used as a "first cut" with "dirty" samples or once the hydrocarbons have been characterized and proper QA/QC is followed.
- 6. TETRAETHYL LEAD (TEL) analysis may be required if total lead is detected unless the determination is made that the total lead concentration is geogenic (naturally occurring).
- 7. CHLORINATED HYDROCARBONS (CL HC) AND BENZENE, TOLUENE, XYLENE AND ETHYLBENZENE (BTX&E) are analyzed in soil by EPA methods 8010 and 8020 respectively, (or 8240) and in water, 601 and 602, respectively (or 624).
- 8. OIL AND GREASE (O & G) may be used when heavy, straight chain hydrocarbons may be present. Infrared analysis by method 418.1 may also be acceptable for O & G if proper standards are used. Standard Methods" 17th Edition, 1989, has changed the 503 series to 5520.
- 9. PRACTICAL QUANTITATION REPORTING LIMITS are influenced by matrix problems and laboratory QA/QC procedures. Following are the Practical Quantitation Reporting Limits:

	SOIL PPM	WATER PPB
TPH G	1.0	50.0
TPH D	1.0	50.0
BTX&E	0.005	0.5
0 & G	50.0	5,000.0

Based upon a Regional Board survey of Department of Health Services Certified Laboratories, the Practical Quantitation Reporting Limits are attainable by a majority of laboratories with the exception of diesel fuel in soils. The Diesel Practical Quantitation Reporting Limits, shown by the survey, are:

ROUTINE	MODIFIED PROTOCOL
<pre> ≤ 10 ppm (42%) ≤ 5 ppm (19%) ≤ 1 ppm (35%)</pre>	<pre>≤ 10 ppm (10%) ≤ 5 ppm (21%) ≤ 1 ppm (60%)</pre>

When the Practical Quantitation Reporting Limits are not achievable, an explanation of the problem is to be submitted on the laboratory data sheets.

- 10. LABORATORY DATA SHEETS are to be signed and submitted and include the laboratory's assessment of the condition of the samples on receipt including temperature, suitable container type, air bubbles present/absent in VOA bottles, proper preservation, etc. The sheets are to include the dates sampled, submitted, prepared for analysis, and analyzed.
- 11. IF PEAKS ARE FOUND, when running samples, that do not conform to the standard, laboratories are to report the peaks, including any unknown complex mixtures that elute at times varying from the standards. Recognizing that these mixtures may be contrary to the standard, they may not be readily identified; however, they are to be reported. At the discretion of the LIA or Regional Board the following information is to be contained in the laboratory report:

The relative retention time for the unknown peak(s) relative to the reference peak in the standard, copies of the chroma- togram(s), the type of column used, initial temperature, temperature program is C/minute, and the final temperature.

12. REPORTING LIMITS FOR TPH are: gasoline standard ≤ 20 carbon atoms, diesel and jet fuel (kerosene) standard ≤ 50 carbon atoms. It is not necessary to continue the chromatography beyond the limit, standard, or EPA/DHS method protocol (whichever time is greater).

EPILOGUE

ADDITIVES: Major oil companies are being encouraged or required by the federal government to reformulate gasoline as cleaner burning fuels to reduce air emissions. MTBE (Methyl-tertiary butyl ether), ETHANOL (ethyl alcohol), and other chemicals may be added to reformulate gasolines to increase the oxygen content in the fuel and thereby decrease undesirable emissions (about four percent with MTBE). MTBE and ethanol are, for practical purposes, soluble in water. The removal from the water column will be difficult. Other compounds are being added by the oil companies for various purposes. The refinements for detection and analysis for all of these additives are still being worked out. If you have any questions about the methodology, please call your Regional Board representative.

EXHIBIT B - SUBCONTRACTOR SCOPE OF WORK

SUNOL PUMP STATION

UNDERGROUND PETROLEUM STORAGE TANK REMOVAL PROJECT SPECIFICATIONS FOR L&W ENVIRONMENTAL SERVICES

AS SUBCONTRACTOR TO CDM ENGINEERS AND CONSTRUCTORS INC.

- 1. Prior to any field activities, L&W Environmental Services (SUBCONTRACTOR) will obtain all necessary permits from the appropriate Alameda County offices. All work shall be accomplished according to the permit requirements and other local, state, and federal requirements.
- 2. SUBCONTRACTOR will review CDM Engineers and Constructor's (ENGINEER's) Site Health and Safety Plan. SUBCONTRACTOR will prepare a site specific Health and Safety Plan. SUBCONTRACTOR will provide ENGINEER with copies of SUBCONTRACTOR's Health and Safety Plan and certificates of training for the 40-hour hazardous waste site training required by 29 CFR 1910.120 for all SUBCONTRACTOR employees to be used on site.
- 3. The area is secured by the San Francisco Water Department, however, the SUBCONTRACTOR will erect necessary barriers to insure worker and public safety, site security, and meet the requirements of any permits.
- 4. SUBCONTRACTOR will remove overlying asphalt and excavate the soil around the tanks. The SUBCONTRACTOR will temporarily stockpile any potentially contaminated soil on site, pending analytical results. The SUBCONTRACTOR will dispose of the asphalt and uncontaminated soil.
- 5. SUBCONTRACTOR will evaluate the need for shoring after initial excavation has been started. If the SUBCONTRACTOR or ENGINEER at any time decide that shoring is required, all field work shall cease until a shoring plan has been completed and signed by a California Registered Professional Civil Engineer, and that shoring has been installed.
- 6. SUBCONTRACTOR will provide support for any utilities exposed during excavation. SUBCONTRACTOR will remove all associated piping between the tanks and the pump station exterior walls after insuring that the pipes are empty. SUBCONTRACTOR will cap the pipes at the pump station exterior walls.

- 7. SUBCONTRACTOR will remove and dispose of the 10,000 gallon diesel storage tank, the 400 gallon lubricating oil tank, and the 400 gallon waste oil tank. Removal, transportation, and disposal of the tanks will follow the requirements of the Alameda County Health Care Services Agency and the California Department of Toxics Substances Control. Specifically, the procedures will include inerting the tanks to a maximum of 10% of the lower explosive limit, transporting the tanks under a hazardous waste manifest signed by the City of San Francisco, and supplying a certificate of destruction.
- 8. If the SUBCONTRACTOR or ENGINEER identify any soil as petroleum-containing, through visual, odor or photoionization detector identification, the decision to further excavate or to backfill will be made by the City of San Francisco.
- SUBCONTRACTOR will sample the excavation according to the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites. If groundwater is present in the excavation, SUBCONTRACTOR will remove and dispose of up to three volumes of the ponded water prior to sampling. A minimum of one water sample and two soil samples (at the soil-groundwater interface) will be taken in each excavation. If no groundwater is present in the excavation, a minimum of two soil samples will be taken into the native soil below the ends of the 10,000 gallon tank, and a minimum of one sample will be taken below each of the 400 gallon tanks. Soil samples will be handled according to EPA and California Department of Health requirements. A minimum of one sample will be taken from each piping trench.

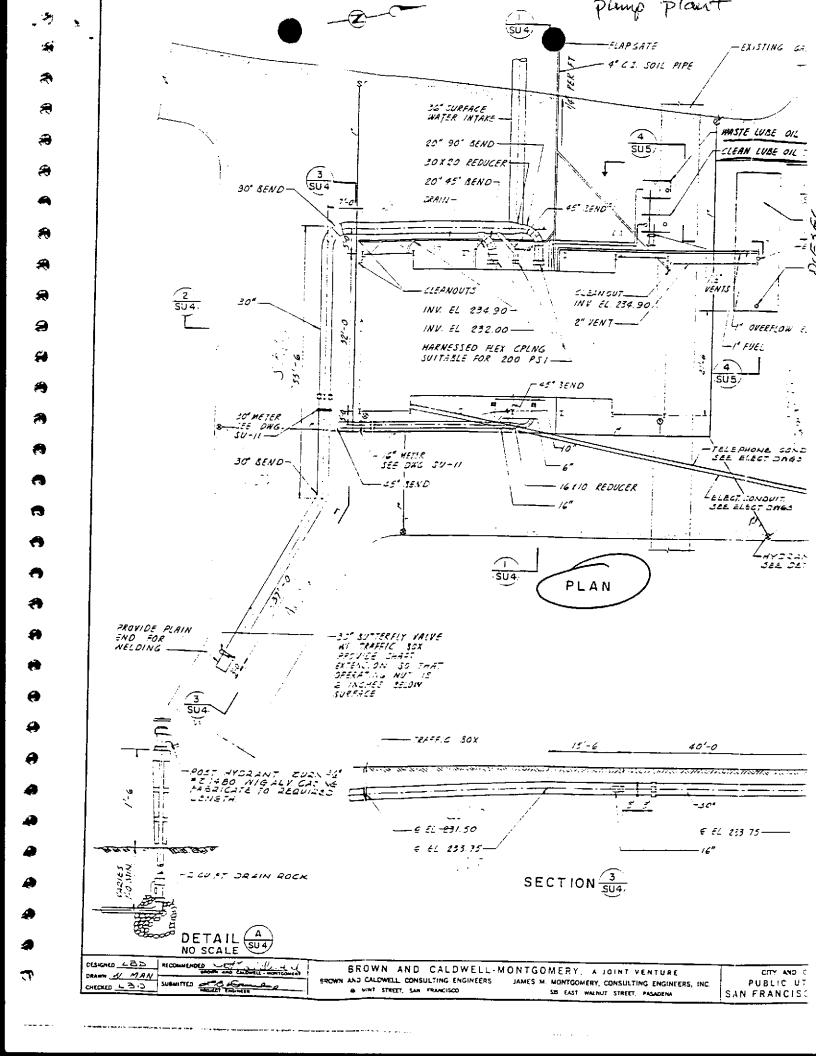
The samples from the excavation area and the lubricating oil tank excavation area will be analyzed for total petroleum hydrocarbons as diesel and for benzene, toluene, ethylbenzene and xylenes at a State certified laboratory. The sample(s) from the water oil tank excavation area will be analyzed for total petroleum hydrocarbons as gasoline; total petroleum hydrocarbons as diesel; benzene, toluene, ethylbenzene, and xylenes; oil and grease; chlorinated hydrocarbons by EPA Method 8010; semivolatile organic compounds by EPA Method 8270; and cadmium, chromium, lead, zinc, and nickel. In addition, any other analyses required by the Alameda County Department of Health Care Services Agency shall be performed. All samples will be analyzed by a State certified laboratory. SUBCONTRACTOR will provide ENGINEER the original copies of the laboratory analytical results of the excavation sampling.

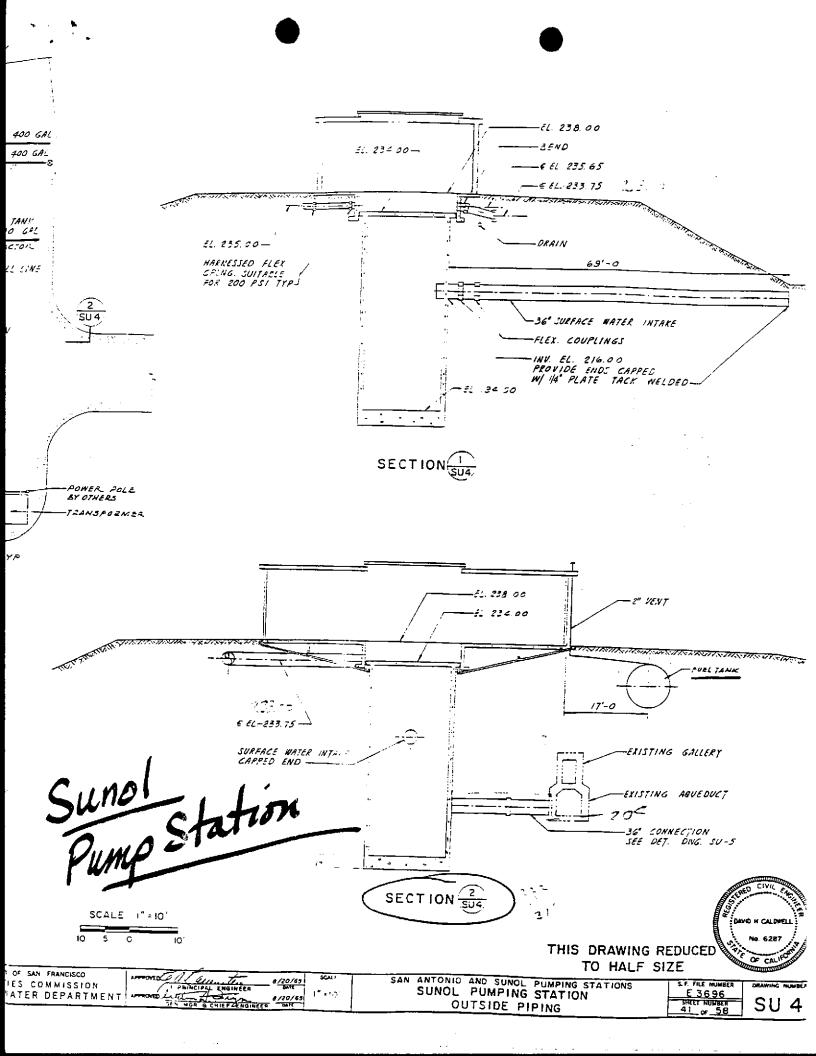
10. All piping not removed will be flushed, grouted and/or sealed, as appropriate, by SUBCONTRACTOR.

- 11. SUBCONTRACTOR will backfill the excavation with clean material capable of supporting the truck traffic associated with the pump station. SUBCONTRACTOR will supply material specification to ENGINEER, and if necessary a sample of the material for testing, and ENGINEER reserves the right to disapprove of any material selected. If necessary, SUBCONTRACTOR will compact the soil to specification provided by ENGINEER. ENGINEER will provide for compaction testing.
- 12. SUBCONTRACTOR will repave the surface with asphalt to match the existing surface and provide sufficient support for the truck traffic associated with the pump station.

SCHEDULE AND BUDGET

SUBCONTRACTOR will undertake the above Scope of Work Items 1 through 12 for a total cost not-to-exceed \$24,540. Work will be scheduled by SUBCONTRACTOR with the approval of ENGINEER and OWNER.





City and County of San Francisco

Department of Public Health



February 7, 1992

Attn: Scott Seery Alameda Department of Environmental Health 80 Swan Way #210 Oakland, CA 94621

Dear Mr. Seery,

We have received your letter of January 22, 1992 and are proceeding to implement additional groundwater monitoring at the San Francisco Water Department Alameda Division facility at 505 Paloma Way in Sunol. We have authorized a contractor, Crosby & Overton, Inc. to take monthly groundwater level measurements, to collect quarterly groundwater samples, and to prepare quarterly summary reports.

The groundwater level in each of the three monitoring wells will be measured this date (February 7) and during the first week of each month. Groundwater samples will be collected during the week of February 17 and thereafter during the first week of every third month (May, August, etc.). Reports will be prepared as soon as possible after laboratory analysis results are received. We expect to submit the first quarterly summary report by March 15 and to submit successive reports by the first day of the month following the sampling (Jume, September, etc.).

If you have any questions or comments, please call me at (415) 554-2796.

Sincerely,

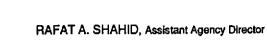
David Wells

cc: Suresh Patel
Phil Caskey

ALAMEDA COUNTY **HEALTH CARE SERVICES**

AGENCY

DAVID J. KEARS, Agency Director



January 22, 1992

Mr. David Wells City and County of San Francisco Department of Public Health 101 Grove Street San Francisco, CA 94102

DEPARTMENT OF ENVIRONMENTAL HEALTH 80 Swan Way, Rm. 210 Oakland, CA 94621 (415) 271-4300

SFWD SUNOL YARD HEADQUARTERS, 505 PALOMA WAY, SUNOL, ALAMEDA RE: COUNTY

Dear Mr. Wells:

This Department is in receipt and has completed review of the November 14, 1991 Harding Lawson and Associates (HLA) report entitled "Phase I Soil and Groundwater Investigation, San Francisco Water Department Sunol Yard, 505 Paloma Way, Sunol, California." general, this report documents the installation of three (3) ground water monitoring wells, results of the sampling and analyses of soil and ground water, and ground water gradient determinations.

Soil samples collected during boring advancement were analyzed for specific target compounds based upon each boring's proximity to a suspected source area shown in previous work to be impacted by a particular suite of contaminants. Hence, target compounds for samples collected from one boring were not necessarily those sought for samples collected from another. Ground water analyses mirrored those for soil samples collected from their respective borings during advancement.

Laboratory results indicate that soil collected from boring B-3 (MW-3) at the depth of 20 feet below grade (BG) exhibited the highest concentration of contaminants in any samples collected from the other two borings. Total petroleum hydrocarbons (TPH), characterized as motor oil, total oil and grease (TOG), and total recoverable hydrocarbons (TRH) were found at concentrations of 203, 213, and 181 parts per million (ppm), respectively. Toluene was also detected in this sample at a concentration of 124 parts per billion (ppb). According to the cited HLA report, this sample depth is within the approximate zone of expected ground water fluctuation.

Wells MW-1 and -2 are located within 10 feet of their expected source areas, the former oil spill and UST sites, respectively. During development of this project, both MW-1 and -2 were sited in the presumed downgradient position of their respective source areas, based upon the site's location relative to the confluence of Arroyo de la Laguna and Alameda Creek. Well MW-3 was located in an area thought to be far downgradient of both source areas.

Mr. David Wells RE: SFWD, 505 Paloma Way, Sunol January 22, 1992 Page 2 of 3

Ground water elevations measured during August and September 1991 indicate flow is towards the south-southwest. Hence, based solely upon these two ground water elevation measurements, none of the wells appear to be downgradient of their intended source areas. However, well MW-1 does appear to be somewhat downgradient of the former underground storage tank (UST) site.

The current placement of wells at this site does present a distinct problem: wells MW-1 and -2 are not located within 10 feet and in the confirmed downgradient position of either the former oil smill area or UST site has back seat the man and the located as a located to downgradient of the site, as intended. MW-1 is somewhat downgradient of one source area, but is approximately 60 feet away. The need to install appropriate downgradient wells does present itself.

However, the cited HLA report does argue that, because of the relatively flat ground water gradient, ground water gradient determinations may require additional rounds of data collection before absolute confirmation may be made. We concur with this position.

At this time please adhere to the following sampling and monitoring schedule:

1) Ground water samples are to be collected **quarterly**. Samples shall be analyzed according to the following modified approach:

MW-1 TPH-G/D, VOC, TOG (EPA 5520 series)

MW-2 TPH-G/D, BTEX, TOG (EPA 5520 series)

MW-3 TPH-G/D, VOC, TOG (EPA 5520 series)

2) Ground water elevations shall be measured monthly, as previously indicated in this department's August 16, 1991 correspondence. Ground water elevations shall be presented both in tabular fashion and on site gradient maps.

Please continue to submit summary reports on a **quarterly** basis. Such reports are due the first day of the second month of each subsequent quarter (i.e., August 1, November 1, February 1, and May 1). Hence, the next report is due February 1, 1992, and shall document site activities occurring during the 4th quarter of 1991.

Mr. David Wells

RE: SFWD, 505 Paloma Way, Sunol

January 22, 1992

Page 3 of 3

After the collection and analysis of several more months worth of gradient information, the decision for the installation of additional wells will be made.

Please call me at 510/271-4320 should you have any questions or comments.

Sincerel,

Sectt O. Seery, CHMM

Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health Edgar Howell, Chief, Hazardous Materials Division Gil Jensen, Alameda County District Attorney's Office Lester Feldman, RWQCB Howard Hatayama, DTSC Ed Stewart, SFWD

Suresh Patel, SF Utilities Engineering Bureau

Jeff Ludlow, HLA

(415)

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

DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621

August 16, 1991

Mr. David Wells City and County of San Francisco Department of Public Health 101 Grove Street San Francisco, CA 94102

RE: SFWD SUNOL YARD HEADQUARTERS, 505 PALOMA WAY, SUNOL, ALAMEDA

Dear Mr. Wells:

This Department has completed review of the August 8, 1991 Harding Lawson Associates (HLA) addendum to the initial November 5, 1990 HLA preliminary site assessment (PSA) proposal, which describes the tasks associated with a subsurface investigation of the referenced SFWD property in Sunol. This proposal, as amended, has been accepted.

A report must be submitted within 45 days of the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly for the duration of the investigation until eligible for final "sign-off" by the RWQCB.

Such quarterly reports are due the first day of the second month of each subsequent quarter (i.e., August 1, November 1, February 1, and May 1). Hence, a report documenting work occurring during the fourth quarter 1991 is due for submittal on or before February 1, 1992; a report documenting work occurring during the first quarter 1992 is due May 1, etc.

Please adhere to the following minimum monitoring schedule for the initial year of the investigation at this site, unless otherwise notified:

- Water levels in each well are to be measured and recorded monthly for the next year, and then quarterly thereafter;
- 2) <u>All</u> (new) monitoring wells are to be sampled **monthly** for the first quarter. Such monthly sampling <u>may</u> be reduced to quarterly after the first three months if concentrations of target compounds remain stable, or diminish;
- 3) As indicated previously, summary reports are to be submitted to this Department and the RWQCB quarterly for the life of this project.

Mr. David Wells

RE: SFWD Sunol Headquarters, 505 Paloma Way

August 16, 1991

Page 2 of 2

Please be advised 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 the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day. Any extensions of stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Should you have any questions, please call me at 415/ 271-4320.

Sincerel

Sect 0. Seery, CHMM

files

Hazardous Materials Specialist

CC: Rafat A. Shahid, Assistant Agency Director, Environmental Health Edgar Howell, Chief, Hazardous Materials Division Gil Jensen, Alameda County District Attorney's Office Howard Hatayama, TSCD Lester Feldman, ACWD Ed Stewart, SFWD Dave Dingman, SFWD John Rapp, SFDPH Suresh Patel, SF Utilities Engineering Bureau Jeff Ludlow, Harding Lawson Assoc.

DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621

Certified Mailer # P 367 604 441

July 26, 1991

Mr. David Wells City and County of San Francisco Department of Public Health 101 Grove Street San Francisco, CA 94102

RE: SFWD SUNOL YARD HEADQUARTERS, 505 PALOMA WAY, SUNOL, ALAMEDA COUNTY

Dear Mr. Wells:

On March 1, 1991, a notice, addressed to Harding Lawson Associates (HLA), was issued from this Department describing several issues which required resolution before HLA's preliminary site assessment proposal (PSA) would be approved and the environmental investigation initiated. A March 31, 1991 deadline was given for submittal of this information.

During the weeks following issuance of the March 1 notice, I had the opportunity to speak with Mr. Jeff Ludlow of HLA on two occasions, the most recent being May 16, 1991. During the May 16 conversation we discussed several issues raised in the March 1 letter, and reached some reasonable compromises. However, Mr. Ludlow informed me that SFPUC had essentially "pulled the plug" on completing the project at that time, but felt that the project would eventually proceed.

I then spoke that same day with Mr. Larry James of SFPUC regarding the status of the project. He indicated that there had been some difficulty encumbering funds, but that the funding issue had just been resolved. He indicated that this Department should anticipate a response to the March 1 notice within a couple of weeks. To date, no such response has been received.

Please be reminded that it was on July 9 and 13, 1990 that notice was first given to the San Francisco Health Department and Utilities Engineering Bureau regarding the City and County of San Francisco's legal responsibility to conduct a site investigation pursuant to the California Water Code. Field work was to have originally begun no later than September 9, 1991.

At this time, you are hereby directed to submit a response to the March 1, 1991 departmental notice within 15 days, or by the close of business, August 9, 1991. This response shall be in the form of an addendum to the original November 5, 1990 HLA proposal, and shall completely and accurately address the issues presented in the March 1, 1991 notice.

Mr. Dave Wells RE: SFWD Sunol Yard, 505 Paloma Way July 26, 1991 Page 2 of 2

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Failure to respond or a late response will result in the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day per violation. Any extensions to the stated deadlines, or modifications to the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Should you have any questions about the content of this letter, please call me at 415/271-4320.

Sincere 1/1/1/1

cott 0, Seery, CHMM

Hazardoùs Materials Specialist

Rafat A. Shahid, Assistant Agency Director, Environmental Health Edgar Howell, Chief, Hazardous Materials Division Gil Jensen, Alameda County District Attorney's Office Lester Feldman, RWQCB Howard Hatayama, DHS Jill Duerig, ACWD Ed Stewart, SFWD Dave Dingman, SFWD John Rapp, SFDPH Jeff Ludlow, Harding Lawson Assoc. files

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

March 1, 1991

Jeffrey F. Ludlow Harding Lawson Associates 303 Second Street, Suite 630 North San Francisco, CA 94107 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

RE: SFWD SUNOL YARD HEADQUARTERS, 505 PALOMA WAY, SUNOL, ALAMEDA COUNTY; PSA PROPOSAL REVIEW

Dear Mr. Ludlow:

Thank you for your submittal of the November 5, 1990 Harding Lawson Associates (HLA) work plan proposal entitled, <u>Preliminary Report, San Francisco Water District Sunol Yard, 505 Paloma Way, Sunol, California</u>, as submitted under HLA cover. Thank you also for the remittance January 29, 1991 of project oversight fees totalling \$1244. The noted work plan, outlining proposed actions to assess the extent of contamination and subsurface conditions at the referenced site, has been reviewed by this Department in conjunction with the San Francisco Bay Regional Water Quality Control Board (RWQCB).

This work plan may be approved for this stage of the site investigation provided the following issues are resolved or clarified to the satisfaction of this Department:

- Soil and ground water samples collected near the former "oil spill area", when analyzed for TOG, should utilize the newest EPA Method 5520 D & F/C & F, as opposed to the 503 Series;
- 2) During boring advancement, soil samples are also to be collected at any significant change in lithology and areas of obvious contamination. The current proposal indicates that samples will be collected at 5-foot intervals, only;
- 3) Please briefly discuss sampling QA/QC protocol. It is recommended that the QA/QC sampling protocol include such elements as duplicate samples, and trip and equipment blanks, among others;
- 4) All soil samples collected from borings advanced proximal to the "oil spill area" and former UST pit are to be analyzed for the presence of target compounds identified in the proposal (not just the samples collected from 1-2 feet above the water table, as proposed). Soil samples collected from the third, downgradient well are to be analyzed if "hits" on field screening instruments (e.g., PID, etc.) are identified during advancement; no fewer than 2 samples shall be analyzed from this well;

Mr. Jeffrey F. Ludlow

RE: SFWD, 505 Paloma Way, Sunol

March 1, 1991 Page 2 of 2

- 5) Please describe chain-of-custody procedures;
- 6) Please describe techniques for free product measurement, and observation of sheen and odor;
- 7) Please describe plans to survey wells to an established benchmark to 0.01 foot, relative to MSL. Further, please describe water level measurement procedures;
- 8) Future water level measurements should include level measurements of the on-site ACWD wells noted in the proposal to help define the hydrogeologic controls affecting ground water flow about the site;
- 9) Please submit a schematic well construction diagram;
- 10) You are encouraged to use non-phosphate detergents (e.g., Liqui-Nox) when decontaminating sampling/purging equipment;
- 11) No Site Safety Plan was submitted. Please submit such a plan, being certain that its scope adheres to guidelines specified under Part 1910.120 (i)(2) of 29CFR;.
- 12) Please be advised that the Alameda County Water Conservation and Flood Control District, Zone 7, in Pleasanton is the agency to contact for receipt of well drilling/destruction permits.

Please respond in writing to the previous list of items within 30 days, or by March 31, 1991. Your response should be in the form of an addendum to the November 5 work plan. Please feel free to contact me at 415/271-4320 should you have any questions regarding the content of this letter.

Sincerely

Scott O. Seery

Hazardous Materials Specialist

CC: Rafat A. Shahid, Assistant Agency Director, Environmental Health Edgar Howell, Chief, Hazardous Materials Division Gil Jensen, Alameda County District Attorney's Office Lester Feldman, RWQCB Howard Hatayama, DHS Jill Duerig, ACWD Ed Stewart, SFWD Dave Dingman, SFWD David Wells, SFDPH John Rapp, SFDPH Bruce Tsubui, SFDPH



January 29, 1991

3457,008.04

Alameda County Department of Environmental Health 80 Swan Way, Room 200 Oakland, California 94621

Attention:

Mr. Scott Seery

Gentlemen:

Review Fee
Preliminary Report
San Francisco Water District Sunol Yard
Sunol, California

Enclosed, please find a check for \$1,244.00 for the Alameda County Department of Environmental Health to review Harding Lawson Associates' (HLA) report titled: "Preliminary Report, San Francisco Water District Sunol Yard, 505 Paloma Way, Sunol, California," dated November 5, 1990. Please provide your comments regarding this report at your earliest convenience.

If you have any questions, please do not hesitate to contact me.

Yours very truly,

HARDING LAWSON ASSOCIATES

Jeffrey F. Ludlow Project Geologist

JFL/dm/B10158-CT50

Enclosure

Certified Mailer # P 062 128 118

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

October 3, 1990

Mr. David Wells City and County of San Francisco Department of Public Health 101 Grove Street San Francisco, CA 94102

RE: SFWD SUNOL YARD HEADQUARTERS, 505 PALOMA WAY, SUNOL, ALAMEDA COUNTY

Dear Mr. Wells:

This letter shall serve to summarize the outcome of the October 2, 1990 meeting between: yourself, and Messrs. John Rapp and Bruce Tsubui, representing the S.F. Department of Public Health (DPH); Messrs. Ed Stewart and Dave Dingman, SFWD; Mr. Steve Luquire, San Francisco Bay RWQCB; and, this author, Alameda County Environmental Health Department, Hazardous Materials Division.

As you will recall, the focus of this meeting was to discuss the requirements of the RWQCB and Alameda County for the preliminary assessment of subsurface conditions underlying the referenced SFWD site, and to determine to what degree the current scope of work proposed by the DPH has satisfied these requirements. It was determined that the current DPH plan does not meet the minimum requirements of an acceptable preliminary site assessment (PSA) proposal, as outlined in the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks.

As a result of the determinations outlined above, it was agreed upon by those parties present at the meeting to allow DPH an additional period of 30 days from the date of the meeting to compose and submit a PSA proposal which satisfies the RWQCB minimum requirements. This proposal will discuss, among others, such elements as:

- o The initial installation of a minimum of three (3) ground water monitoring wells; and/or,
- o The advancement of a suitable number of borings adequately located as to provide accurate and useful data to aid in locating an initial three (3) ground water monitoring wells and characterize soil conditions underlying this site.

Please reference the noted RWQCB Staff Recommendations, and its Appendix A (which augments the Staff Recommendations), to aid in composing the PSA proposal. Please bear in mind this PSA proposal and all subsequent reports, as well as project direction, must be under the seal of California-registered geologist, engineering geologist, or civil engineer with the appropriate project and professional background.

Mr. David Wells

RE: SFWD Sunol Yard Headquarters, 505 Paloma Way

October 3, 1990

Page 2 of 2

As was previously indicated, the PSA proposal is due within 30 days, or by November 1, 1990. Please remit a check totalling \$1,244 to offset expenses incurred by this Department in oversight of this Project. (Note: The noted \$1,244 deposit is the sum of \$744 and \$500 previously requested in correspondence from this office dated July 9 and 13, 1990, respectively, and reflects the initial discrete managerial control of the two subsites which are the focus of our present investigation.)

Should you have any questions, please call me at 415/271-4320.

Sincerely,

Scott O. Seery

files

Hazardous Materials Specialist

CC: Rafat A. Shahid, Assistant Agency Director, Environmental Health Edgar Howell, Chief, Hazardous Materials Division Gil Jensen, Alameda County District Attorney's Office Lester Feldman, RWQCB Steve Luquire, RWQCB Howard Hatayama, DHS Jill Duerig, ACWD Ed Stewart, SFWD Dave Dingman, SFWD John Rapp, SFDPH Bruce Tsubui, SFDPH

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Department of Public Health



August 13, 1990

City and County of San Francisco Department of Public Health Bureau of Environmental Health Services

Mr. Scott Seery
Hazardous Materials Specialist
Alameda County Health Care Services Agency
Department of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

90 AUG 14 AM 5: 00

RE: San Francisco Water Department Sunol Facility, 505 Paloma Way, Sunol CA

Dear Mr. Seery:

Thank you for your recent correspondence regarding the referenced site. We appreciate the opportunity to work with your Department toward the comprehensive assessment and, if appropriate, further remediation of the contamination events at this site.

This letter is in response to your letter dated July 9, 1990 that was addressed to Mr. Suresh Patel with the Utilities Engineering Bureau regarding the removal of underground tanks and your letter dated July 13, 1990 that was addressed to Mr. David Wells with the Department of Public Health regarding soil contamination from waste oil collection activities.

Site activities to date have permitted visualization of significant portions of the subsurface environment and collection of other information about the areas of concern. We have submitted existing technical data to a consulting geologist that is available to assist in matters relating to assessment and remediation. Upon review of our data and our correspondence, and in consideration of the apparently sensitive nature of the site, the consultant recommended that an appropriate first step towards a development of a truly meaningful work plan would be the placement of two borings in the immediate area(s) of concern. The purpose of the borings would be to more thoroughly define soil characteristics to the depth of groundwater and to obtain additional soil and, if possible, groundwater samples.

In consideration of the recommendation received, it is proposed that one boring be advanced to groundwater in the immediate area of the storage building and a second in the area previously occupied by the underground fuel storage tanks. Each boring would be advanced with a truck mounted 8" outside diameter, continuous-flight, hollow-stem auger under the direction of a qualified geologist working under the review of a registered civil engineer.

The borings would be continuously logged using the Unified Soil Classification System and soil samples acquired for lithologic and chemical analyses at five foot intervals and at the top of the capillary fringe within brass sampling tubes contained within a California Modified Split Spoon Sampler driven through the hollow stem of the drilling auger(s).

Promptly upon the opening of the sampler, the ends of the 1.92 inch x 6.0 inch clean, brass tubes contained within would be covered with aluminum foil, fitted with plastic caps, and sealed with black electrical tape. Each tube would then be marked, placed on dry ice, and transported to a state certified hazardous waste analytical laboratory with a chain of custody record. Samples taken from the area of the storage building would be analyzed for volatile organic compounds using EPA Method 8240, total oil and grease (TOG) using SM 503 D&E, as well as total and soluble lead. Samples taken from the area of the underground storage tanks would be analyzed for total petroleum hydrocarbons as gasoline (TPH-G), benzene, toluene, total xylenes, and ethylbenzene using EPA Methods 5030/8015-8020 and total petroleum hydrocarbons as diesel (TPH-D) using EPA Methods 3550/8015.

Should conditions permit, it is further proposed that a grab water sample be obtained from each boring by lowering a clean, disposable acrylic or PVC bailer down the borehole to a point immediately below the surface of the water. Upon being brought above grade, the contents of each bailer would be promptly transferred into a single one-liter amber glass sample bottles and into two 40 milliliter VOA vials fitted with teflon-lined screw caps. The sample containers would be marked, placed on blue ice, and transported to a State certified hazardous waste analytical laboratory with chain of custody record and analyzed as indicated above for soil samples.

All sampling and drilling equipment will be steam cleaned or thoroughly scrubbed with alconox or trisodium phosphate solution followed by a distilled water rinse prior to being brought on site and between samplings.

Duplicate samples and/or blanks will be prepared or obtained as specified by Alameda County.

Decisions regarding the positions of the borings will be made in conjunction with Alameda County.

Although this letter does not follow the specific format contained in Appendix A of the Regional Board's guidelines, we are proposing a preliminary step that together with information obtained previously, will indicate the extent to which a full site assessment is necessary. Upon development of data acquired during the course of the activities described above, to include, as appropriate, modeling of vadose and saturated conditions, migration potentials, risk assessment and remedial options, a report will be prepared for your review which, if necessary, will also include a comprehensive workplan for the site.

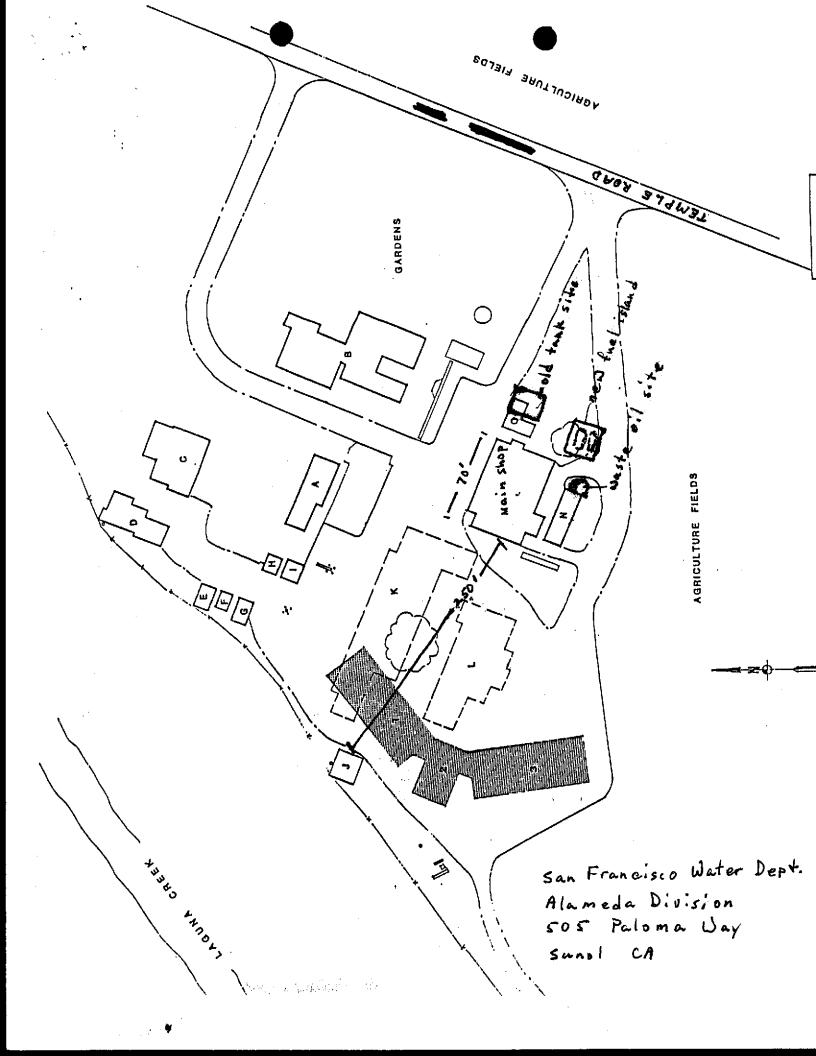
We are requesting that the San Francisco Water Department provide a check for your department in the amount of \$1244 to cover your oversight activities. We will forward this payment to you as soon as it becomes available.

Should you have any questions regarding the above, or if we may otherwise be of assistance, please contact either John Rapp at 554-2756 or Dave Wells at 554-2796.

Sincerely,

Dave Wells 554-2796

Darre Wella



RODEL E. RODIS
PRESIDENT
SHERRI CHIESA
VICE PRESIDENT
H. WELTON FLYNN
ARTHUR V. TOUPIN
GORDON CHIN

ART AGNOS, MAYOR

THOMAS J. ELZEY, GENERAL MANAGER

UTILITIES ENGINEERING BUREAU BONALD F. KEENER, MANAGER MUNICIPAL RAILWAY
WATER DEPARTMENT
HETCH HETCHY
WATER AND POWER

CERTIFIED MAIL: P-511 122 299

July 30, 1990

Mr. Scott O. Seery Hazardous Material Specialist Alameda County, Dept. of Environmental Health 80 Swan Way, Room 200 Oakland, CA 94621

Re: UST Closure Report, SFWD Sunol Yard HQ:
Request for Preliminary Site Assessment (PSA) Proposal

Dear Mr. Seery:

I have forwarded your letter dated July 9, 1990 on the above subject to Mr. David Wells of the City's Dept. of Public Health, Bureau of Toxics and Safety Services. As you know, he is already working on a similar project at an adjacent site at Sunol. (Ref. your Letter of July 13, 1990 to Mr. D. Wells).

His department will be the lead agency for the UST investigation and wPll be handling the project from now on. Your contact there would be Wr. David Wells (Tel. No. 554-2796). In the future, please address all correspondence relating to this project to him, whose address you already have.

If you have any questions regarding the content of this letter, please call me at 554-1807.

Sincerely,

Suresh Patel Project Manager

SP:dy

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

DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621

(415)

July 13, 1990

Mr. David Wells City and County of San Francisco Department of Public Health Toxics and Safety Services 101 Grove Street San Francisco, CA 94102

Certified Mailer # P 062 127 866

RE: SOIL CONTAMINATION CLEAN-UP PROJECT; SFWD SUNOL YARD HEADQUARTERS, 505 PALOMA WAY, SUNOL, ALAMEDA COUNTY

Dear Mr. Wells:

This letter confirms our telephone conversation July 11 and this Department's review of the January 4, 1990 American Environmental Management Corporation (AEMC) report, submitted under San Francisco Department of Public Health (SFDPH) cover dated March 28, 1990. The referenced AEMC report documents work performed by AEMC and SFDPH personnel November 15 and 30, 1990 during the investigation of soil contamination in proximity to a storage shed at the referenced site. Soil in this area exhibited some evidence of contamination with volatile organic compounds and metals during a preliminary investigation conducted during September 1989, documented in a SFDPH letter report dated November 9, 1989.

Among the contaminants identified in the sample collected during the September 1989 field activities, as documented in the November 9 report, several chlorinated and nonchlorinated compounds were present, as follows:

COMPOUND	CONCENTRATION
1,1-dichloroethane	400 ppb
1,1,1-trichloroethane	570
tetrachloroethylene	2,300
benzene	37
toluene	690
ethyl benzene	320
total xylenes	3,200
4-methyl-2-pentanone	690

Mr. Dave Wells RE: SFWD, 505 Paloma Way, Sunol July 13, 1990 Page 2 of 4

Lead was also present in this sample at a concentration of 200 ppm, more than 10 times the STLC value for this compound. According to the referenced November 9 report, the sampling depth was approximately 12 to 18 inches below grade.

Initial samples collected during the November 15 field activities identified the presence of total oil and grease (TOG) as high as 31,000 ppm in a sample identified as Sunol No. 1, collected from the sidewall of the excavation just under the foundation of the storage shed. A sample collected several feet laterally beneath this foundation (Sunol No. 3), representative of that soil still undisturbed and left in place below the shed, showed TOG concentrations of 12,000 ppm.

Final samples collected at the bottom of the excavation identify the presence of TOG as high as 150 ppm (Sunol No. 8) and total recoverable hydrocarbons (TRH), 290 ppm (Sunol No. 4). The final depth of the excavation is approximately 7 1/2 feet below grade at the south end, sloping to a shallower depth towards the north. The SFDPH cover to the January 4 AEMC report indicates that the soil becomes very sandy. The AEMC report identifies this soil as a very fine to fine grained silty sand (SW-ML). The excavation has since been backfilled and capped with asphalt.

As you are likely aware, this site is located at the head of Niles Canyon within a portion of the Sunol ground water subbasin, near the confluence of Arroyo de la Laguna and Alameda Creek. This alluvial basin is an area where the percolation and infiltration of irrigation water, precipitation, and stream flow provides significant recharge to the ground water aquifer. Water destined for domestic use is extracted at the Sunol filter gallery within a quarter mile of the site. Effluent flow into Alameda Creek helps to recharge ground water reservoirs underlying the Niles Cone at its apex in the vicinity of the Niles district of Fremont.

In light of this site's sensitive location and the potential impact upon drinking water resources a release of hazardous materials could produce, the presence of TOG, TRH, metals, and volatile compounds, particularly the chlorinated species, provides an element of concern regarding the future integrity of the resources which underlie this site. Therefore, you are requested to perform additional tasks to ensure that the integrity of these water resources has not been impacted by the historical releases identified by the aforementioned reports, and to remediate the soils impacted by waste oil and other contaminants.

Mr. Dave Wells RE: SFWD, 505 Paloma Way, Sunol July 13, 1990 Page 3 of 4

Your attention is directed to the July 9, 1990 correspondence from this Department which was addressed to Mr. Suresh Patel of the San Francisco Utilities and Engineering Bureau (SFUEB), and copied to you. The noted letter directs the SFUEB to conduct a ground water investigation following the closure of three underground storage tanks (UST) at this site during May of this year.

This preliminary site assessment (PSA) entails, among others, the installation of a suitable number of monitoring wells. Generally three (3) wells are initially installed. Water level measurements are surveyed in each well and, through the solution of a three-point problem to define the plane assumed to constitute the surface of the water table, the ground water gradient and flow direction are determined.

An additional well must be installed in the <u>confirmed</u> down gradient position from the contaminated area in proximity to the storage shed. The exact location of this well must be based upon the results of the ground water gradient determination associated with the UST investigation. This well should be within 10 feet of the contaminated area once this contaminated area's full extent is known.

The full extent of the contamination, both laterally and vertically, will not be known until such time as the soil investigation continues in the area beneath the storage shed where sample Sunol No. 3 identified the presence of TOG at concentrations of 12,000 ppm. Therefore, you must pursue the soil investigation to the fullest extent possible. Contaminated soils must be excavated from the site and either treated on-site or disposed of at a facility licensed to accept wastes of this type. This activity will likely involve the demolition of the storage shed. We understand that the shed is already slated for demolition in the near future; however, the date for this demolition will need to be moved up to meet the requirements of this Department.

Please submit for review a proposal which outlines your planned activities pertinent to meeting the requirements outlined this letter. However, the installation and monitoring of the ground water well may be best left to those California-certified professionals engaged in the ground water investigation associated with the former UST subsite. Hence, this (well installation) aspect should be incorporated as an element of the proposal addressing the UST investigation. The SFUEB is being notified of this fact by way of copy of this letter.

Mr. Dave Wells

RE: SFWD, 505 Paloma Way, Sunol

July 13, 1990 Page 4 of 4

This Department will oversee all work at this site. This oversight will include the review and comment on work proposals and technical guidance during the investigation and remediation. Your proposal must be submitted within 30 days of the date of this letter, or by September 13, 1990. Accompanying this proposal must be a check payable to Alameda County totalling \$500 to offset expenses incurred by this Department during oversight of this project.

A report must be submitted within 30 days of the soil excavation/remediation phase of this project. This report must document all work performed at the site, plans for the treatment or disposal of the affected soils, the results of laboratory analyses, and recommendations for future work, among other elements.

Any work requiring professional geologic or hydrologic interpretations or recommendations must be submitted under seal of a California-certified engineering geologist, -registered geologist or civil engineer. A statement of qualifications must be included with your report for each lead professional.

This project will require that you coordinate your scope of work and schedule of site activities with those individuals and city departments engaged in the UST investigation. Our contact for the UST investigation is Mr. Suresh Patel of the SFPEUB.

Should you have any questions regarding the content of this letter, please contact me at 415/271-4320.

Sincerely

Scott O. Seery

Hazardous/Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health Department

Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Steve Luquire, RWQCB
Howard Hatayama, DHS
Jill Duerig, ACWD
Suresh Patel, SFEUB
Bob Vasconcellos, SFWD

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Certified Mailer # P 062 127 859

July 9, 1990

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

Mr. Suresh Patel City and County of San Francisco Utilities Engineering Bureau 1155 Market Street, 5th Floor San Francisco, CA 94103

RE: UNDERGROUND STORAGE TANK CLOSURE REPORT; SFWD SUNOL YARD HEADQUARTERS, 505 PALOMA WAY, SUNOL: REQUEST FOR PRELIMINARY SITE ASSESSMENT (PSA) PROPOSAL

Dear Mr. Patel:

Our office has completed review of the underground storage tank (UST) closure report submitted by Stacey & Witbeck - Rogers / Genner a JV. This report documents the removal May 15 and 16, 1990 of three (3) USTs, and provides the results of analyses performed upon soil samples collected May 16, 1990.

The results of the laboratory analyses indicate that motor fuel constituents were present in the sample collected below the 550 gallon diesel tank (Sample WD 2022-1), including 40 ppm total petroleum hydrocarbons as diesel (TPH-D), 7.6 ppm TPH as gasoline (TPH-G), as well as concentrations of benzene, toluene, ethylbenzene, and xylene isomers (BTEX) well above their respective detection limits. Samples collected from below the 550 and 1000 gallon gasoline tanks also showed minor concentrations of certain of the volatile BTEX compounds.

This facility is located at the head of Niles Canyon along a portion of the Alameda Creek watershed. The site is within one of three subbasins of the Sunol Valley Ground Water Basin, the Sunol subbasin. The Quaternary alluvium which underlies this site consists primarily of highly permeable, unconsolidated beds of sand, gravel and boulders with discontinuous layers of clay, typical of streambed deposits. According to the State of California Department of Water Resources Bulletin No. 118-2, June 1974, these deposits have a permeability of up to 10 ft/day (75 gal/day).

Significant recharge of ground water in the Sunol subbasin is through infiltration and percolation of precipitation, stream flow along Alameda Creek, and water applied for irrigation and other uses on the Quaternary alluvium of the valley. The largest extractions of ground water in the Sunol subbasin have occurred at the Sunol filter galleries located at depths of about 15 feet. Other significant discharge is by effluent flow into Alameda Creek. Infiltration and percolation of this effluent flow helps to recharge the ground water reservoirs underlying the Niles Cone at its apex in the vicinity of the Niles district of Fremont.

Mr. Suresh Patel RE: 505 Paloma Way, Sunol July 9, 1990 Page 2 of 4

As a result of this site's sensitive location and the potential impact a release of hazardous materials could have upon domestic drinking water supplies, you are requested to perform additional investigative work to ensure that the integrity of these water supplies has not been compromised. This preliminary site assessment (PSA) will help to define the vertical and lateral impact upon ground water and soils resulting from any releases from the tanks prior to their removal. The information gathered by this investigation will be used to determine an appropriate course of action to remediate the site, if necessary. The PSA must be conducted in accordance with the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks. The major elements of such an investigation are summarized in the attached Appendix A.

In order to proceed with a site investigation, you should obtain professional services of a reputable environmental/geotechnical firm. Your responsibility is to have the consultant submit for review a proposal outlining planned activities pertinent to meeting the criteria broadly outlined in this letter and the attached Appendix A.

This Department will oversee the site assessment for the referenced facility. This oversight will include our review and comment on work proposals and technical guidance on appropriate investigative approaches. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7. The RWQCB may choose to take over as lead agency if it is determined following the completion of the initial assessment that there has been a substantial impact upon ground water.

This PSA proposal is due within 30 days of the date of this letter, or by August 9, 1990. Once this proposal has been reviewed and approved, work should commence no later than September 9, 1990. Accompanying this proposal must be a check payable to Alameda County totalling \$744 to offset expenses incurred by this Department in oversight of this project.

A report must be submitted within 30 days after the completion of this phase of work at the site. Subsequent reports must be submitted quarterly until this site qualifies for final RWQCB "sign off". Such quarterly reports are due the first day of the second month of each subsequent quarter (i.e., November 1, February 1, May 1, and August 1). These reports should describe the status of the remediation/investigation and must include, among others, the following elements:

Mr. Suresh Patel

RE: 505 Paloma Way, Sunol

July 9, 1990 Page 3 of 4

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

All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. Please include a statement of qualifications for each lead professional involved with this project.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a late response could result in the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Should you have any questions about the content of this letter, please call me at 415/271-4320.

Sincerely,

Scott O. Seery

Hazardous Materials Specialist

CC: Rafat A. Shahid, Assistant Agency Director, Alameda County
Department of Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Steve Luquire, RWQCB
Howard Hatayama, DHS

Mr. Suresh Patel

RE: 505 Paloma Way, Sunol

July 9, 1990 Page 4 of 4

cc: (con.'t)

Jill Duerig, ACWD David Wells, San Francisco Health Department

P D62 127 659 ..

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CERTIFICATE OF DISPOSAL

MAY 21, 1990

H & H Ship Service Company hereby certifies to STACY & WITBECK that:

1. The storage tank(s), size(s) 1-1,000 GALS. AND 2-550 GALS.

removed from the S.F. WATER DEPARTMENT
facility at 505 PALOMA WAY

SUNOL, CALIFORNIA

were transported to H & H Ship Service Company, 220 China Basin St., San Francisco, California 94107.

- 2. The following tank(s), H & H Job Number 4430

 have been steamed cleaned, cut with approximately 2' X 2' holes, rendered harmless and disposed of as scrap metal.
- 3. Disposal site: LEVIN METALS CORPORATION, RICHMOND, CALIFORNIA.
- 4. The foregoing method of destruction/disposal is suitable for the materials involved, and fully complies with all applicable regulatory and permit requirements.
- 5. Should you require further information, please call (415) 543-4835.

Very Truly Yours,

Oliverand Valrey Operations Coordinator





CERTIFICATE OF DISPOSAL

MAY 21, 1990

H & H Ship Service Company hereby certifies to STACY & WITBECK that:		
1. The storage tank(s), size(s) 1-1,000 GALS. AND 2-550 GALS.		
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- The foregoing method of destruction/disposal is suitable for the materials involved, and fully complies with all applicable regulatory and permit requirements.
- Should you require further information, please call (415) 543-4835.

Very Truly Yours,

Operations Coordinator



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ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

80 Swan Way, #200 Oakland, CA 94621 (415) 271-4320

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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

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UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

ı.	Business Name	SAN FRANCISCO WATER DEPT.
	Business Owner	SAN FRANCISCO WATER DEPT.
2.		505 Paloma Way
	city	Sunol Zip 94586 Phone 862-2233
3.		SAN FRANCISCO WATER DEPT., PO Box 550
	City	Sunol, CA Zip 94586 Phone 862-2233
4.	Land Owner	SAN FRANCISCO WATER DEPT.
		425 Mason Street _{City} , State SF, CA Zip94102
5.	EPA I.D. No.	Cal 000027309 PHC Corp. Yard
	Contractor	Stacy & Withork-Dogors/Conner JV
0.		200 Toland Street
	City	
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		Phone

8.	Contact Person for Investigation	
	Name JIM PUTLER	Title CONSTRUCTION INSPECTOR
	Phone872-5990	
9.	Total No. of Tanks at facility3	<u> </u>
10.	Have permit applications for all tan office? Yes [X]	ks been submitted to this No []
11.	State Registered Hazardous Waste Tra	nsporters/Facilities
	a) Product/Waste Tranporter	
	Name H & H SHIP SERVICE COMPANY	EPA I.D. No. CAD004771168
	Address 220 China Basin Street,	
	City San Francisco	State CA Zip 94107
	b) Rinsate Transporter	
	Name (See a)	EPA I.D. No
	Address	
	City	State Zip
	c) Tank Transporter	
	Name (See a)	EPA I.D. No
	Address	
	city	State Zip
	d) Tank Disposal Site	
	Name H & H SHIP SERVICE COMPANY	EPA I.D. No. CAD004771168
	Address 220 China Basin Street	
	City San Francisco	State CA zip 94107
	e) Contaminated Soil Transporter	
	Name (See a)	EPA I.D. No
	Address	
	City	State Zip

12. Samp	ple	Collector	Lic.	489689
Na	ame	L.F. GENNER CONSTRUCTION	ON, INC. (STATE LIC.	A-Certified Haz. Mat.)
Co	ощра	ny Larry F. Genner		
Ac	ddre	ss 1306 Bridgeway Blvd.		
C:	ity	Sausalito Sta	te <u>CA</u> Zip <u>94965</u>	Phone(415) 331-1302
13. Sam	plin	g Information for each	tank or area	
	ı	ank or Area	Material sampled	Location & Depth
Capacity	У	Historic Contents (past 5 years)	-	PIPING-: EVERY 20 LINEAR REF
550 6 550 6 1000 6	Gal	Diesel Unlead Gas Regular Gas	SOIL (AND WATER IF ENCEUNTERED)	SMALL TANKS: ONE (1) SOM PLE, MINIMUM, IN NATIVE SOIL WITHIN TWO FEET OF BACKFILLY NATIVE SOIL INTERFACE, BELOW FILL ACCESS LARGE TANK: AS ABOVE, BUT TWO (2) SAMPLES, ONE BELOW EACH END OF TANK, MINIMUM
		nks or pipes leaked in describe.] No [*]
		ethods used for rendering		
If	yes,	describe. Carbon [·	•
			•	PER LOCAL FIRE
		DEFT REGUREN Losion proof combustible mertness.	gas meter shall	be used to verify
16. Lab	orat	tories		
Nam	ne _	Precision Analyttcal		
Add	lres	s4136 Lakeside Drive		
Cit	-Y _	Richmond	State CA	Zip 94806
:.e.	+- 4	Cortification No. 211		

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
Gas (leaded) Gas (Undleaded) Diesel	ERA METHOD 5030 SW 846 SOMCATION No Groundwater encountered	TPH-G 1030 LUFT METHOS BTX&E 8020 TPH-D 3550 BTX&E 8020

- 18. Submit Site Safety Plan
- 19. Workman's Compensation: Yes [X] No []

 Copy of Certificate enclosed? Yes [X] No []

 Name of Insurer FREMONT WORKERS COMPENSATION
- 20. Plot Plan submitted? Yes [X] No []
- 21. Deposit enclosed? Yes [X] 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) LAWRENCE F. GENNER	<u> </u>				
Signature Z. F. Henry					
Date 2/12/90					
Signature of Site Owner or Operator					
Name (please type)					
Date $\frac{2/(2/90)}{}$					

Sunol Fuel Tanks Replacement

SITE SAFETY PLAN

The contaminates anticipated are gasoline and diesel fuel, there is no indication of leakage, there are two 550 gallon tanks and one 1000 gallon tank.

Larry Genner is the project manager and will act as site safety officer.

An explosimeter will be on site for checking the tanks before removal.

Two fire extinguisher will be near the excavation area.

Field personnel will attend a safety meeting before the removal activity begins.

It is not anticipated that the potential levels of exposure will reach PEL or TLV limits.

Protective clothing including coveralls, boots, and gloves will be mandatory for all field personnel.

The area of excavation will be cordoned off with barricades and warning tape to deny access to the pubic.

EMERGENCY TELEPHONE NUMBERS

Fire and Police

911

Sunol Fire Department

415-862-2197

California Division of Forestry

Stacy & Witbeck

415-285-7570

CHEMTREC

1-800-424-9300

Occupational health group

408-298-0211

HOSPITAL

415-447-7000

Valley Memorial in Livermore 1111 E Stanly Blvd. take highway 84 east to Livermore hospital directly off 84 follow signs

NSURANCE SERVICES, INC.	EXTEND OR ALTER I	THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW COMPANIES AFFORDING COVERAGE COMPANY A				
75 Ygnacio Valley Road, A200	CO					
alnut Creek, CA. 94596 415) 932-1866	COMPANY A FTE					
SUB-CODE		emont Compen	sation	71 10		
RED	COMPANY B					
TACY AND WITBECK, INC. and ROGERS/GENNER, A JOINT VENTURE	COMPANY C					
. 0. Box 11642	COMPANY D					
an Francisco, CA. 94101	COMPANY E					
/ERAGES THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTE	ED BELOW HAVE REEN ISSI	JED TO THE INSURI	ED NAMED ABOVE	FOR THE POLICY PERIOD		
INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM C CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURA EXCLUSIONS AND CONDITIONS OF SUCH POLICIES, LIMITS SE	R CONDITION OF ANY CON NICE AFFORDED BY THE P	CLICIES DESCRIBE	D HEREIN IS SUB	HESPECT TO MUTCH THIS		
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AND WP 89-120457-02 EMPLOYERS LIABILITY	2 12-30-03			(DISEASE—EACH EMPLO)		

Attn: Mr. Deane Gough ACORD 25-S (3/88)

San Francisco, CA. 94103

RIVERFIX MEN Y MAN HE MUSIC THEK CONTHUND AND X XXXXII Y MEDEVITATIONE CX

AUTHORIZED REPRESENTATIVE

CACORD CORPORATION 1988

Maintenance Yard

City and County of San Francisco

Department of Public Health



90 MAR 30 PM 3: 50

March 28, 1990

Department of Environmental Health Hazardous Materials Division 80 Swan Way, Suite 200 Oakland, CA 94621

Attn: Scott Seary

Dear Mr. Seary:

The purpose of this letter is to inform you of the status of mitigation activities for soil contamination at the Sam Francisco Water Department Alameda Division maintenance facility at 505 Palema Way near Sunol in Alameda County. The project involved cleanup of a small area of ground next to a storage shed where a deposit of waste oil was discovered in October 1989. This letter is a followup to our letter dated November 9, 1989 in which we informed you of the discovery of the site and intended mitigation activities.

Contaminated soil was excavated on Bovember 15, 1989. The excavation ran approximately 14 feet along the foundation of the storage building with a width ranging from 8 to 16 feet. The deepest point of the excavation was about 7.5 feet below the ground surface. The total volume of soil removed was approximately 30 cubic yards.

The volume of soil where contamination was the most highly visible was a bowl shaped volume 3 to 4 feet in diameter near the ground surface and 2.5 to 3 feet deep. This volume was located adjacent to the foundation of the shed and extended under the foundation near the surface. A sample from the center of this volume showed total cil and grease at 31.000 mg/kg. In the remainder of the excavation, most contamination appeared to occur in the upper 2 to 3 feet below the surface. At depths of 3 feet to 7 feet, the most visible contamination occurred in the south end of the excavation near the most highly contaminated volume.

Four samples, two from the sidewalls and two from the bottom of the excavation, were taken to confirm that contamination was removed. One bottom sample, near the south end, showed 290 mg/kg total hydrocarbons.

After receiving results from samples taken during the initial excavation, an additional 1.5 to 2 feet of soil was removed from the south end and two additional samples were taken. At this depth the soil became very sandy?

The two additional samples showed residual oil and grease at 120 and 150 mg/kg. Lighter chain hydrocarbons in the diesel range were not detectable at a detection limit of 10 mg/kg.

Several VOC's were detected in samples from the most contaminated soil at levels ranging from .03 to 3.2 ppm. VOC's were not detected in clearance samples. Levels of lead, cadmium, chromium, and zinc were not above TTLC's or STLC's (x 10) in any of the samples.

In our first letter to you, it was reported that there may have once been a shallow pit at this location used for dumping waste oil. This was apparently in error and due to misinterpretation of initial reports received by us from the Water department. Subsequent conversations with the facility manager and with a retired employee indicated that waste oil was collected in drums at the contaminated area and that there never was a pit. The site was used for waste oil collection for at least 20 years and up until 3 to 5 years ago. Ground contamination was probably due to spillage and due to tipping drain pans against the shed to allow residuals to drain.

In anticipation of bioremediation of the excavated soil, the waste pile was mixed and sampled. Four samples, each consisting of a composite from four sampling points, were analyzed for total oil and grease. The four results were 880, 1000, 1200, and 1300 mg/kg for an average of 1100 mg/kg. Based on this result and on results of samples taken during the excavation, it was determined that the waste pile was not a hazardous waste and the bioremediation project was initiated.

At the average concentration of oil and grease present in the waste pile, the total quantity of oil would have been approximately 6 gallons. Given this quantity, the limited mobility of oil in soil, and the observations during the excavation, we are concluding that the total amount of oil deposited on the soil was relatively small and that the potential for impact of groundwater is insignificant.

During the excavation, the contaminated soil beneath the storage building could not be entirely removed. After removing as much as possible, two samples were taken and the two results were 12,000 mg/kg and less than 100 mg/kg oil and grease. Both samples were taken between 1.5 and 2 feet below the surface and within 2.5 feet of the most contaminated soil.

The excavation has been filled with clean material and the area covered with asphalt. The storage building will be demolished in the next two years during planned facility improvements. When the shed is demolished, any residual contamination under it will be removed.

A California Registered Geologist, James Frumm, was present during the excavation of contaminated soil. A copy of his report is enclosed. The report contains laboratory reports for most samples. The laboratory report for samples taken from the waste pile are enclosed separately.

If you have concerns or questions, please call me at 554-2796.

Sincerely,

David Wells, Senior Inspector

David Wells

San Francisco Department of Public Health

cc: Deborah Rohrer Don Dalke, RWQCB

Curtis & Tompkins, Ltg.

LAB NUMBER: 19018

CLIENT: S.F. HEALTH DEPARTMENT PROJECT ID: SUNOL

DATE RECEIVED: 12/21/89 DATE ANALYZED: 12/28/89

DATE REPORTED: 01/03/90

PAGE 2 OF 2

ANALYSIS: OIL AND GREASE

METHOD: SMWW 503E

LAB ID	SAMPLE 1D	RESULT	UNITS	DETECTION LIMIT
19018-1	SUNOL #10	1,000	mg /Kg	50
19018-2	SUNOL #11	1,300	mg/Kg	50
19018-3	SUNOL #12	1,200	mg/Kg	50
19018-4	SUNOL #13	880	mg/Kg	50

QA/QC SUMMARY

RPD, %	<1			
RECOVERY, %	89			

soil excavation below gas dispusse

470-27th Street, Third Floor Oakland, California 94612 (415) 874-7237

December 30, 1987

Richard Fehler Clayton Environmental Consultants, Inc. P.O. Box 9019 1252 Quarry Lane Pleasanton, CA 94566

Subject: Site Investigation Project Report, San Francisco Water

Department, 505 Paloma Way, Sunol, CA

Dear Mr. Fehler:

A review of the site investigation report submitted on September 14, 1987 for the above site has been conducted. It appears that no further clean up is required at this time. Please insure that the Regional Water Quality Control Board has a copy of this report as they have the final approval for the clean up plan.

Should you have any questions regarding this matter, please contact Lizabeth Rose, Hazardous Materials Specialist, at (415) 874-7237.

Sincerely,

Rafat Shahid, Chief, Hazardous Materials Division

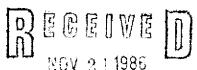
RAS:LR:lr

cc: Regional Water Quality Control Board San Francisco Water Department

City and County of San Facisco

Department of Public Works
Bureau of Engineering





November 19, 1986

SUBJECT:

Unauthorized Release Report - 5 Day Follow Up Report For San Francisco Water Dept

Tank at Sunol

1.3.31

ENVIRONMENTAL HEALTH ADMINISTRATION

Mr. Ted Gerow
Division of Environmental Health
470 - 27th Street, Room 324
Oakland, CA 94612

Dear Mr. Gerow:

This will serve as the 5 day follow up report on the Unauthorized Release reported on November 13, 1986 for the San Francisco Water Department tank at 505 Paloma Way, Sunol. Pertinent information is as follows:

Substance: Gas fuel; quantity of release unknown; Tank Test result was -0.089 gal/hr.

Discovery: Leak was discovered during high level testing using Horner EZY-CHEK. Low level test showed tank to be tight, therefore, leak is assumed to be located in piping. Leak was stopped by lowering product level.

Investigation: No investigation has been performed to date to determine the extent of soil or groundwater contamination.

Proposed Action: No action has been taken to date. We propose to excavate the site to expose the piping to locate the leak. The leaking pipe will be repaired and soil samples will be taken to determine the extent of the contamination. If the contamination is minor and limited to the immediate location, it will be removed and disposed of in a legal manner. Imported backfill will be placed to restore the site. If the extent of contamination is major, additional investigation will be performed and a site mitigation plan will be prepared to clean up the contamination.

Responsible Party: The owner is the City and County of San Francisco, San Francisco Water Department.

SFWD Contact Person: Mr. Tom Duffy (415) 697-4424

Mr. Scott Nakamura

November 19, 1986

Page Two

A copy of this report will be transmitted to the Regional Water Quality Control Board and the State Water Resources Control Board to satisfy reporting requirements.

If you have any questions, please call me at (415) 558-4816.

Very truly yours,

Willy Tsai Project Manager

WT:hl

cc: D. Bowyer, RWQCB
 T. Brazell, SWRCB

bcc: Tom Duffy, SFWD Millbrae Yard

E. Warren, City Attorney's Office

R. Fehler, McKesson