

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



COVT
8-2506

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

August 23, 2006

Ms. Suzanne Chaewsky
AC Transit
10626 E. 14th Street
Oakland, CA 94603

Subject: Fuel Leak Case No. RO0000402, AC Transit Facility, 1177 47th Street, Emeryville, CA

Dear Ms. Chaewsky:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the "Technology Screening Report" dated June 2004. Current Laboratory analytical results from the sampling conducted in February 2006, indicate that groundwater from well MW-13 contains free phase petroleum hydrocarbon. Furthermore, a supplemental off site investigation conducted in October 2003 detected elevated levels of dissolved petroleum hydrocarbon contamination in groundwater in soil boring SB-8, at concentrations of 26,000 µg/L, 110,000 µg/L, 84,000 µg/L, 250 µg/L, and 125 µg/L for TPHg, TPHd, TPHss, MiBE and benzene, respectively.

Based on the presence of free phase product in on site monitoring well MW-13 and soil boring SB-4 and elevated concentrations of dissolved petroleum hydrocarbons in groundwater off site in soil borings SB-8 and SB-9, ACEH has concluded that characterization of this site is not complete. Therefore, you are required to conduct additional off-site investigation to determine the extent of plume migration, combined with groundwater monitoring and cleanup in order to reach site closure.

According to the June 2004 "Technology Screening Report", remediation technology screening was performed for the site, and several remedial alternatives were deemed to be appropriate as possible interim remedial measures. ACEH agrees that free product removal in the source area and offsite plume migration controls should be implemented. Lastly, the preparation of a Site Conceptual Model (SCM) is recommended to provide a framework, which can then be used to help guide the investigation and clean up process.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Off Site Soil and Groundwater Characterization.** The lateral and vertical extent of soil and groundwater contamination off site has not been fully defined. Soil borings SB-7, SB-8 and SB-9 extend to depths of 24 feet, 16 feet and 24 feet, respectively. Review of the soil boring

data indicate there is a more permeable unit at approximately 20 to 22 feet bgs., which may be acting as a conduit for off site plume migration. Also, groundwater analytical data collected from these soil borings indicate that the dissolved contamination plume has not been fully delineated. Furthermore, contamination migration appears to be consistent with the projected groundwater gradient, toward the west/northwest. These conclusions confirm that further off site investigation is needed to define the extent of contamination down gradient of the site.

The Work Plan requested below is to include plans to characterize petroleum hydrocarbon concentrations in groundwater within the shallow groundwater zone and possible deeper water-bearing zones. Please consider the use of depth discrete groundwater samples collected along a west/northwest trending transect to characterize off site conditions prior to installation of monitoring wells. We request that you use detailed hydrogeologic cross sections to determine the appropriate location and design for monitoring wells that are needed to appropriately characterize the three-dimensional extent of soil and groundwater contamination down gradient of the site. To appropriately evaluate your site, the monitoring wells will need to be screened in the permeable zones with screen lengths that match the stratigraphic sequence. Please include the above information in the Work Plan requested below.

2. **Evaluation of Remedial Action Objectives and Remedial Alternatives.** During quarterly monitoring in 2002, seven feet of free product was discovered in onsite monitoring well MW-13. The initial release was linked to a leak from the hydraulic hoist, and free product removal was implemented to mitigate the release. In May 2004 AC Transit presented a series of corrective measures that are intended to help mitigate source area contamination and control plume migration off site. ACEH agrees with the need for free product recovery in the source area and the implementation of off site plume migration control. However, prior to the commencement of any remedial actions a feasibility study should be conducted to determine the efficacy of the chosen remedial alternative. Please discuss in detail your approach to remove free product from the source area, and your plan to control down gradient dissolved petroleum hydrocarbon contamination migration. Please present your rationale for the remedial method chosen in the Work Plan requested below.
3. **Well Survey.** ACEH requests that you locate all wells (monitoring and production wells: active, inactive, standby, decommissioned, abandoned and dewatering, drainage and cathodic protection wells) within 2,000 ft of the subject site. We recommend that you obtain well information from both Alameda County Public Works and the State of California Department of Water Resources, at a minimum. As part of your well survey, please perform a background study of the historical land uses of the site and properties in the vicinity of the site. Please refer to the Regional Board's guidance for identification, location, and evaluation of potential deep well conduits when conducting your well survey. Please include the results of your Well Survey in the Work Plan requested below.
4. **Project Approach and Investigation Reporting – Site Conceptual Model.**

We anticipate that characterization and remediation work in addition to what is requested in this letter will be necessary at and down gradient from your site. Considerable cost savings can be realized if your consultant focuses on developing and refining a viable Site Conceptual Model (SCM) for the project. A SCM is a set of working hypotheses pertaining to

all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point, the SCM is said to be "validated." The validated SCM then forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

When performed properly, the process of developing, refining and ultimately validating the SCM effectively guides the scope of the entire site investigation. We have identified, based on our review of existing data, some key data gaps in this letter and have described several tasks that we believe will provide important new data to refine the SCM. **We request that your consultant develop a SCM for this site, identify data gaps, and propose specific supplemental tasks for future investigations.** There may need to be additional phases of investigations, each building on the results of the prior work, to validate the SCM. Characterizing the site in this way will improve the efficiency of the work and limit its overall cost.

The SCM approach is endorsed by both industry and the regulatory community. Technical guidance for developing SCMs is presented in API's Publication No. 4699 and EPA's Publication No. EPA 510-B-97-001 both referenced above; and "Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Appendix C," prepared by the State Water Resources Control Board, dated March 27, 2000.

The SCM for this project would incorporate, but not be limited to, the following:

- a) A concise narrative discussion of the regional geologic and hydrogeologic setting obtained from your background study. Include a list of technical references you reviewed, and copies (photocopies are sufficient) of regional geologic maps, groundwater contours, cross-sections, etc.
- b) A concise discussion of the on-site and off-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to down gradient and above-ground receptors. Be sure to include the vapor pathway in your analysis. Maximize the use of large-scale graphics (e.g., maps, cross-sections, contour maps, etc.) and conceptual diagrams to illustrate key points. Include structural contour maps (top of unit) and isopach maps to describe the geology at your site. Geologic cross-sections, which include an interpretive drawing of the vertical extent of soil and groundwater contamination (i.e., an interpretive drawing—not a plot of laboratory results). The SCM report requested below is to include one cross section parallel and one cross section perpendicular to the contaminant plume axis. Each cross section should include, but not be restricted to, the following:
 1. Subsurface geologic features, depth to groundwater and man-made conduits.
 2. Surface topography. The cross sections should be extended off-site where necessary to show significant breaks in slope.
 3. Soil descriptions for all borings and wells along the line of section.
 4. Screen and filter pack intervals for each monitoring well.

5. Sampling locations and results for soil and grab groundwater samples.
 6. Site features such as the tank pit, dispensers, buildings etc. Where appropriate, monitoring well locations and soil boring locations should be projected back to the strike of the cross section line.
- c) Identification and listing of specific data gaps that require further investigation during subsequent phases of work.
 - d) Proposed activities to investigate and fill data gaps identified above.
 - e) The SCM shall include an analysis of the hydraulic flow system at and downgradient from the site. Include rose diagrams for groundwater gradients. The rose diagram shall be plotted on groundwater contour maps and updated in all future reports submitted for your site. Include an analysis of vertical hydraulic gradients. Note that these likely change due to seasonal precipitation and pumping.
 - f) Temporal changes in the plume location and concentrations are also a key element of the SCM. In addition to providing a measure of the magnitude of the problem, these data are often useful to confirm details of the flow system inferred from the hydraulic head measurements. Include plots of the contaminant plumes on your maps, cross-sections, and diagrams.
 - g) Other contaminant release sites exist in the vicinity of your site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for your SCM. Include a summary of work and technical findings from nearby release sites and incorporate the findings from nearby site investigations into your SCM.

Please report the information discussed above in your initial SCM and include it in the Work Plan requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett), according to the following schedule:

- **September 21, 2006** – Work Plan for Soil and Groundwater Investigation, with Site Conceptual Model and Well Survey
- **90 days following ACEH approval of Work Plan** – Soil and Groundwater Investigation Report

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.

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

Please be aware that you may be eligible for reimbursement of the costs of investigation from the California Underground Storage Tank Cleanup Fund (Fund). In some cases, a deductible amount may apply. If you believe you meet the eligibility requirements, I strongly encourage you to call the Fund for an application.

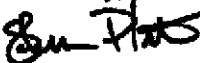
However, please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 383-1767.

Sincerely,



Steven Plunkett
Hazardous Materials Specialist

Suzanne Chaewsky
August 18, 2006
Page 6

cc: Samhita Lahiri
Essel Technology, Inc.
1305 Franklin Street #200
Oakland, CA 94612

Brad Wright
Cameron-Cole LLC
101 West Atlantic Blvd., Building 90
Alameda, CA 94501

Donna Drogos, ACEH
Steven Plunkett, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
8-14-06

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

August 11, 2006

Ms. Suzanne Chaewsky
AC Transit
10626 E. 14th Street
Oakland, CA 94603

Subject: Fuel Leak Case No. RO0000402, AC Transit Facility, 1177 47th Street, Emeryville, CA

Dear Ms. Chaewsky:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the "Technology Screening Report" dated June 2004. Current Laboratory analytical results from the sampling conducted in February 2006, indicate that groundwater from well MW-13 contains free phase petroleum hydrocarbon. Furthermore, a supplemental off site investigation conducted in October 2003 detected elevated levels of dissolved petroleum hydrocarbon contamination in groundwater in soil boring SB-8, at concentrations of 26,000 µg/L, 110,000 µg/L, 84,000 µg/L, 250 µg/L, and 125 µg/L for TPHg, TPHd, TPHss, MtBE and benzene, respectively.

Based on the presence of free phase product in on site monitoring well MW-13 and soil boring SB-4 and elevated concentrations of dissolved petroleum hydrocarbons in groundwater off site in soil borings SB-8 and SB-9, ACEH has concluded that characterization of this site is not complete. Therefore, you are required to conduct additional off-site investigation to determine the extent of plume migration, combined with groundwater monitoring and cleanup in order to reach site closure.

According to the June 2004 "Technology Screening Report", remediation technology screening was performed for the site, and several remedial alternatives were deemed to be appropriate as possible interim remedial measures. ACEH agrees that free product removal in the source area and offsite plume migration controls should be implemented. Lastly, the preparation of a Site Conceptual Model (SCM) is recommended to provide a framework, which can then be used to help guide the investigation and clean up process.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Off Site Soil and Groundwater Characterization.** The lateral and vertical extent of soil and groundwater contamination off site has not been fully defined. Soil borings SB-7, SB-8 and SB-9 extend to depths of 24 feet, 16 feet and 24 feet, respectively. Review of the soil boring

data indicate there is a more permeable unit at approximately 20 to 22 feet bgs., which may be acting as a conduit for off site plume migration. Also, groundwater analytical data collected from these soil borings indicate that the dissolved contamination plume has not been fully delineated. Furthermore, contamination migration appears to be consistent with the projected groundwater gradient, toward the west/northwest. These conclusions confirm that further off site investigation is needed to define the extent of contamination down gradient of the site.

The Work Plan requested below is to include plans to characterize petroleum hydrocarbon concentrations in groundwater within the shallow groundwater zone and possible deeper water-bearing zones. Please consider the use of depth discrete groundwater samples collected along a west/northwest trending transect to characterize off site conditions prior to installation of monitoring wells. We request that you use detailed hydrogeologic cross sections to determine the appropriate location and design for monitoring wells that are needed to appropriately characterize the three-dimensional extent of soil and groundwater contamination down gradient of the site. To appropriately evaluate your site, the monitoring wells will need to be screened in the permeable zones with screen lengths that match the stratigraphic sequence. Please include the above information in the Work Plan requested below.

2. **Evaluation of Remedial Action Objectives and Remedial Alternatives.** During quarterly monitoring in 2002, seven feet of free product was discovered in onsite monitoring well MW-13. The initial release was linked to a leak from the hydraulic hoist, and free product removal was implemented to mitigate the release. In May 2004 AC Transit presented a series of corrective measures that are intended to help mitigate source area contamination and control plume migration off site. ACEH agrees with the need for free product recovery in the source area and the implementation of off site plume migration control. However, prior to the commencement of any remedial actions a feasibility study should be conducted to determine the efficacy of the chosen remedial alternative. Please discuss in detail your approach to remove free product from the source area, and your plan to control down gradient dissolved petroleum hydrocarbon contamination migration. Please present your rationale for the remedial method chosen in the Work Plan requested below.
3. **Well Survey.** ACEH requests that you locate all wells (monitoring and production wells: active, inactive, standby, decommissioned, abandoned and dewatering, drainage and cathodic protection wells) within 2,000 ft of the subject site. We recommend that you obtain well information from both Alameda County Public Works and the State of California Department of Water Resources, at a minimum. As part of your well survey, please perform a background study of the historical land uses of the site and properties in the vicinity of the site. Please refer to the Regional Board's guidance for identification, location, and evaluation of potential deep well conduits when conducting your well survey. Please include the results of your Well Survey in the Work Plan requested below.
4. **Project Approach and Investigation Reporting – Site Conceptual Model.**

We anticipate that characterization and remediation work in addition to what is requested in this letter will be necessary at and down gradient from your site. Considerable cost savings can be realized if your consultant focuses on developing and refining a viable Site Conceptual Model (SCM) for the project. A SCM is a set of working hypotheses pertaining to

all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point, the SCM is said to be "validated." The validated SCM then forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

When performed properly, the process of developing, refining and ultimately validating the SCM effectively guides the scope of the entire site investigation. We have identified, based on our review of existing data, some key data gaps in this letter and have described several tasks that we believe will provide important new data to refine the SCM. **We request that your consultant develop a SCM for this site, identify data gaps, and propose specific supplemental tasks for future investigations.** There may need to be additional phases of investigations, each building on the results of the prior work, to validate the SCM. Characterizing the site in this way will improve the efficiency of the work and limit its overall cost.

The SCM approach is endorsed by both Industry and the regulatory community. Technical guidance for developing SCMs is presented in API's Publication No. 4699 and EPA's Publication No. EPA 510-B-97-001 both referenced above; and "Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Appendix C," prepared by the State Water Resources Control Board, dated March 27, 2000.

The SCM for this project would incorporate, but not be limited to, the following:

- a) A concise narrative discussion of the regional geologic and hydrogeologic setting obtained from your background study. Include a list of technical references you reviewed, and copies (photocopies are sufficient) of regional geologic maps, groundwater contours, cross-sections, etc.
- b) A concise discussion of the on-site and off-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to down gradient and above-ground receptors. Be sure to include the vapor pathway in your analysis. Maximize the use of large-scale graphics (e.g., maps, cross-sections, contour maps, etc.) and conceptual diagrams to illustrate key points. Include structural contour maps (top of unit) and isopach maps to describe the geology at your site. Geologic cross-sections, which include an interpretive drawing of the vertical extent of soil and groundwater contamination (i.e., an interpretive drawing—not a plot of laboratory results). The SCM report requested below is to include one cross section parallel and one cross section perpendicular to the contaminant plume axis. Each cross section should include, but not be restricted to, the following:
 1. Subsurface geologic features, depth to groundwater and man-made conduits.
 2. Surface topography. The cross sections should be extended off-site where necessary to show significant breaks in slope.
 3. Soil descriptions for all borings and wells along the line of section.
 4. Screen and filter pack intervals for each monitoring well.

5. Sampling locations and results for soil and grab groundwater samples.
 6. Site features such as the tank pit, dispensers, buildings etc. Where appropriate, monitoring well locations and soil boring locations should be projected back to the strike of the cross section line.
- c) Identification and listing of specific data gaps that require further investigation during subsequent phases of work.
 - d) Proposed activities to investigate and fill data gaps identified above.
 - e) The SCM shall include an analysis of the hydraulic flow system at and downgradient from the site. Include rose diagrams for groundwater gradients. The rose diagram shall be plotted on groundwater contour maps and updated in all future reports submitted for your site. Include an analysis of vertical hydraulic gradients. Note that these likely change due to seasonal precipitation and pumping.
 - f) Temporal changes in the plume location and concentrations are also a key element of the SCM. In addition to providing a measure of the magnitude of the problem, these data are often useful to confirm details of the flow system inferred from the hydraulic head measurements. Include plots of the contaminant plumes on your maps, cross-sections, and diagrams.
 - g) Other contaminant release sites exist in the vicinity of your site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for your SCM. Include a summary of work and technical findings from nearby release sites and incorporate the findings from nearby site investigations into your SCM.

Please report the information discussed above in your initial SCM and include it in the Work Plan requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett), according to the following schedule:

- **September 15, 2006** – Work Plan for Soil and Groundwater Investigation, with Site Conceptual Model and Well Survey
- **90 days following ACEH approval of Work Plan** – Soil and Groundwater Investigation Report

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.

PERJURY STATEMENT

Suzanne Chaewsky
August 11, 2006
Page 5

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

Please be aware that you may be eligible for reimbursement of the costs of investigation from the California Underground Storage Tank Cleanup Fund (Fund). In some cases, a deductible amount may apply. If you believe you meet the eligibility requirements, I strongly encourage you to call the Fund for an application.

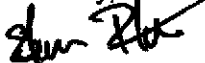
However, please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 383-1767.

Sincerely,



Steven Plunkett
Hazardous Materials Specialist

Suzanne Chaewsky
August 11, 2006
Page 6

cc: Samhita Lahiri
Essel Technology, Inc.
1305 Franklin Street #200
Oakland, CA 94612

Brad Wright
Cameron-Cole LLC
101 West Atlantic Blvd., Building 90
Alameda, CA 94501

Donna Drogos, ACEH
Steven Plunkett, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



9-15-03

ENVIRONMENTAL HEALTH SERVICES

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

RO0000402

September 12, 2003

Ms. Suzanne Patton
AC Transit
10626 East 14th Street
Oakland, CA 94603

RE: Work Plan Approval for AC Transit at 1177 47th Street, Emeryville, CA

Dear Ms. Patton:

I have completed review of Cameron-Cole's July 2003 *Workplan for Supplemental Subsurface Investigation* prepared for the above referenced site. Cameron-Cole proposed to advance up to six soil borings along Doyle Street to further define the extent of TPH and stoddard solvent in groundwater. In addition, two soil borings are proposed within the known plume onsite to get a better understanding of the sand layer encountered at approximately 25 feet bgs. The proposed work plan is acceptable with the following technical comments.

- If groundwater is encountered within borings SB-11 and SB-12, a grab groundwater samples should be collected for laboratory analysis.
- Borings SB-13 and SB-14 should be advanced to a minimum of 35 feet bgs to evaluate the sand layer, if encountered.
- To delineate the vertical extent of contamination, soil samples collected below groundwater elevation should be field screened and submitted for laboratory analysis if warranted.
- Should groundwater monitoring wells be warranted, the vertical length of the screen should not exceed 5 feet.
- Soil and groundwater samples should be analyzed for TPHg, TPHss, TPHd, BTEX, and MTBE. Select groundwater samples may need to be analyzed for hydraulic oil, too.

Field work should commence within 60 days of the date of this letter, or by **November 17, 2003**. Please provide at least 72 hours advance notice of field activities. If you have any questions, I can be reached at (510) 567-6762 or by email at echu@co.alameda.ca.us.

eva chu
Hazardous Materials Specialist

c: Donna Drogos
email: Brad Wright, Cameron-Cole

actransit-9

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



06-17-03

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

RO0000402

June 16, 2003

Ms. Suzanne Patton
AC Transit
10626 East 14th Street
Oakland, CA 94603

RE: Additional Investigation for AC Transit at 1177 47th Street, Emeryville, CA

Dear Ms. Patton:

I have completed review of the case file, and the March 2003 *Groundwater Monitoring Report* and the May 2003 *Subsurface Investigation Report*, both prepared by Cameron-Cole LLC for the above referenced site. In February 2003, five soil borings, SB-1 through SB-5, were drilled to delineate the extent of the hydraulic oil plume. Groundwater from boring SB-1 contained 17,000 ppb stoddard solvent, SB-3 contained 9,500 ppb TPHmo, and SB-4 contained free product and was not sampled. Four soil borings were proposed to further delineate the extent of the plume. It is requested that you address the following technical comments:

- Soil borings proposed are on the west side of Doyle Street. It is recommended that soil borings be advanced along the storm drain line that acts as a preferential pathway for the migration of contaminants. Proposed borings west of the storm drain line may not provide pertinent information.
- Geologic cross-sections did not include storm drain or other utility lines. Please include in an amended cross-section map.
- Groundwater monitoring wells at the site are screened at various depths, some from 5 to 14.5 feet bgs, some from 10 to 19.5 feet bgs, and still others from 15 to 29.5 feet bgs. Depth to water at the site has ranged from approximately 3 to 6.5 feet bgs, with depth to water in wells MW-10, MW-12 and MW-13 ranging from 8.5 to 10.5 feet bgs. A more permeable lens appears to be at about 25 feet bgs. The vertical extent of the plume needs to be better characterized. It is recommended that soil borings be advanced within the plume and depth discrete soil and groundwater samples collected to depths of at least 35 to 40 feet bgs. Data from this investigation will determine if the wells are screened properly.

A work plan to address the above concerns is due within 45 days of the date of this letter, or by July 29, 2003. If you have any questions, I can be reached at (510) 567-6762 or by email at echu@co.alameda.ca.us.

eva chu
Hazardous Materials Specialist

c: Donna Drogos
email: Brad Wright, Cameron-Cole

actransit-8

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0402

November 9, 2001

PR0500969

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

Suzanne Patton
Environmental Engineer
Alameda Contra Costa Transit District
10626 E. 14th Street
Oakland, California 94603

NOTICE OF VIOLATION

Re: AC Transit D2, 1177 47th Street, Emeryville, CA 94608

Dear Ms. Patton:

A regulatory compliance inspection was performed at the subject AC Transit facility on November 8, 2001. Representatives of Service Station Systems facilitated the inspection along with your technician. The purpose of the inspection was to determine compliance with conditions of the facility underground storage tank (UST) operating permit, as well as provisions of Title 23, California Code of Regulations (CCR) and California Health and Safety Code (HSC) Chapter 6.7.

The following is a summary of non-compliant and other conditions noted at the time of the inspection:

- Leak sensor alarm history is undocumented in the site operations records in violation of permit requirements.
- Tank D2-7S, for the emergency generator was incorrectly modified in 1999 without the installation of an annular sensor to monitor the secondary containment.
- Substantial number of bolt down covers missing gaskets to seal out surface intrusion.

- Submersible turbine sump (STP) extension, fiberglass covers improperly sealing and damaged allowing water intrusion into secondary containment for piping.
- Overspill containment for fill tubes contain standing diesel fuel.
- Overspill containment on fill tubes lack integral drain mechanism.
- Fuel stains on concrete near fill points indicates mishandling of fuel during deliveries.
- Dispenser containment leak detection for dispenser #4 failed to function in stopping flow of diesel when in alarm.
- There is a monitoring well in the tank, D2-7S, backfill located near the emergency generator. It is located on the northeast corner of the concrete pad. The monitoring well was found unsecured and without a cap (see photo).

Several violations of provisions of HSC have been identified, as follows:

- HSC Sec. 25293 – The operator of the underground tank system shall monitor the tank system using the method specified on the permit for the tank system.

All leak alarms shall be recorded in the operating log and reconciled as to cause and corrections taken. All maintenance records shall be maintained for review by the local agency.

Leak sensors shall be installed and operated as specified in the operating permit and Title 23. The secondary containment of D2-7S, shall be monitored continuously for releases. A leak sensor shall be installed and connected to the TLS 350 monitoring console.

Dispenser containment monitoring shall be continuous. The monitoring system for dispenser #4 has failed. Monitoring shall be made functional.

Overspill containers for fuel delivery points shall not contain standing product. All containers shall be drained into the primary tank by use of a drain valve installed in the container. The delivery driver should be draining product at the end of the delivery.

All monitoring wells shall be secured against vandalism and surface intrusion. The well located near D2-7S is unsecured and as such presents a threat to groundwater at the site. The well shall be secured or properly abandoned.

November 9, 2001
AC Transit
Page 3 of 3

Please be advised that HSC Sec. 25299(b) provides for civil liabilities imposed on the tank owner of up to \$5000 per tank per day per violation for:

- (2) Violation of any applicable requirement of the permit
- (6) Violation of any applicable requirements of HSC Chapter 6.7

At this time, AC Transit is required to correct the tank system operation and maintenance issues identified in this inspection report, namely:

- Correct the operation and maintenance problems identified during the 11/08/01 inspection
- Document, in writing, the procedure to be used in reconciling all leak alarms.
- Ensure that leak detection in the annular space of D2-7S is operating within the manufacturer's specifications at all times.
- Install drain valves in the overspill containers.
- Proper secure or abandon the monitoring well.

Pursuant to HSC Sec. 25288(d), AC Transit is required to submit a *Plan of Correction* **within 60 days**. This plan shall indicate the tasks to be completed, or those that have been completed already, and the schedule for doing so.

AC Transit must certify, once all the necessary repairs and other tasks have been completed, that the tank systems are in full compliance with HSC Chapter 6.7 and UST regulations.

Please contact me at (510) 567-6781 should you have any questions about the content of this letter.

Sincerely,



Robert Weston
Sr. Hazardous Materials Specialist

enclosure

cc: Guy Greenwood, Technician, AC Transit
Susan Hugo, Manager, ACDEH
Susan Torrence, Alameda County District Attorney's Office

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



8-04-01

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

RO0000402

August 2, 2001

Ms. Suzanne Patton
AC Transit
10626 East 14th Street
Oakland, CA 94603

RE: Workplan Approval for 1177 47th Street, Emeryville, CA

Dear Ms. Patton:

I have completed review of the July 2001 *Amendment to Workplan for Installation of Three Monitoring Wells* prepared for the above referenced site. The three proposed locations of the wells are acceptable. The wells will be installed in the third quarter of 2001. Please provide 72 hours advance notice of field activities.

Quarterly groundwater monitoring should be implemented for the newly installed wells, not semi-annually as proposed in your letter. After four quarters, I will evaluate the groundwater data to decide if the sampling frequency should be modified.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Brad Wright, Cameron-Cole, 2233 Santa Clara Ave, Alameda, CA 94501

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



06-29-01

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

✓ RO0000402

June 28, 2001

Ms. Suzanne Patton
AC Transit
10626 East 14th Street
Oakland, CA 94603

RE: Workplan for 1177 47th Street, Emeryville, CA

Dear Ms. Patton:

I have completed review of Safey-Kleen Consulting's May 2001 *Groundwater Monitoring Report* prepared for the above referenced site. That report also summarized additional subsurface investigations conducted by Tank Farm No. 2 and by the west perimeter of the property.

The groundwater monitoring event in March 2001 revealed results that were consistent with previous sampling events. The grab groundwater samples collected from Tank Farm No. 2 area identified elevated ethylene glycol concentrations and low levels of PCE and TCE. The grab groundwater samples from the west perimeter of the property contained elevated dissolved diesel. Groundwater from boring SB-7 contained TPHd concentrations that suggest the presence of free product.

Soil samples were also collected from soil borings advanced at Tank Farm No. 2. Soil samples were collected at depths ranging from 9 to 16 feet bgs. Soil analytical results revealed up to 560ppm TPHg and unremarkable levels of other analytes sought.

At this time, permanent groundwater monitoring wells should be installed near boring SB-1, SB-6 and SB-7. A workplan detailing the proposed scope of work is due within 60 days of the date of this letter, or by **August 31, 2001**. In addition, groundwater monitoring may be discontinued for wells MW-4, MW-5, MW-8, W-3 and W-4. The monitoring frequency of the remaining wells may be reduced to a semi-annual basis. Groundwater should be sampled in the first and third quarters of each year, until further notice.

Lastly, please explain why soil samples around Tank Farm No. 2 were collected below groundwater elevation. The approved workplan stated that soil samples would be collected from the capillary fringe, which should have been at about 4 feet bgs.

If you have any questions regarding the contents of this letter, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Brad Wright, Safety-Kleen, 2233 Santa Clara Ave, Alameda, CA 94501

actransit-6

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



12-12-00

20402

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 357-9335

StID 1232

December 11, 2000

Ms. Suzanne Patton
AC Transit
10626 East 14th Street
Oakland, CA 94603

RE: **Work Plan Approval for 1177 47th Street, Emeryville, CA**

Dear Ms. Patton:

I have completed review of Safety-Kleen's December 2000 *Addendum to the Workplan for Additional Subsurface Investigation* prepared for the above referenced site. The proposal to advance a total of four soil borings in the vicinity of Tank Farm No. 2 is acceptable with the following changes/additions:

- Soil and groundwater samples should also be analyzed/quantified for TPH as stoddard solvent, TPH as motor oil, TPH as ATF, ethylene glycol, and chlorinate solvents.

In addition, Safety-Kleen's August 2000 *Workplan for Additional Subsurface Investigation* prepared to address the diesel fuel release at Tank Farm No. 1 is also acceptable. Bear in mind that unless it can be demonstrated that groundwater at the site is under confined conditions, future groundwater monitoring wells should be screened from approximately 5 to 20 feet bgs.

Field work should commence within 60 days of the date of this letter, or by **February 14, 2001**. Please provide 72 hours advance notice of field activities. If you have any questions, I can be reached at (510) 567-6762.

A handwritten signature in black ink, appearing to read 'eva chu'.

eva chu
Hazardous Materials Specialist

c: Brad Wright, Safety-Kleen, 2233 Santa Clara Ave., Alameda, CA 94501

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



PO402

StID 1232

November 20, 2000

Ms. Suzanne Patton
AC Transit
10626 E 14th Street
Oakland, CA 94603

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

RE: **Additional Investigations Required for 1177 47th Street, Emeryville, CA**

Dear Ms. Patton:

In October 2000 I reviewed Safety-Kleen's August 2000 *Workplan for Additional Subsurface Investigation* prepared for the above referenced site. Safety-Kleen proposed to advance four grab groundwater borings to delineate the extent of the diesel plume at the western end of the property. Based on the laboratory analytical results, two permanent groundwater monitoring wells will be installed at the site.

The workplan is adequate for addressing the diesel plume due to the former diesel fuel release at Tank Farm No. 1. However, the workplan did not include soil borings in the vicinity of Tank Farm No. 2. I had requested investigations at Tank Farm No. 2 in a letter to you, dated May 24, 2000. I had spoken with Mr. Brad Wright at Safety Kleen to submit a revised work that should also include the advancement of soil borings in the vicinity of Tank Farm No. 2. To date I have not received a revised workplan.

A revised workplan is due within 30 days of the date of this letter, or by **December 21, 2000**. Please be advised that some of the existing monitoring wells are screened from 15 or 18 feet bgs to 25 feet bgs. Please provide evidence that groundwater beneath the site is under confined conditions, otherwise, wells should be screened from approximately 5 to 20 feet bgs.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Brad Wright, Safety Kleen, 2233 Santa Clara Ave, Alameda, CA 94501

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 5-24-2000
mcd cc

20402

StID 1232

May 24, 2000

Ms. Suzanne Patton
AC Transit
10626 E 14th Street
Oakland, CA 94603

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

**RE: UST Closure Report and Additional Investigations Required for 1177 47th Street,
Emeryville, CA**

Dear Ms. Patton:

Thank you for the submittal of Safety-Kleen Consulting's May 1, 2000 *Groundwater Monitoring Report* prepared for the above referenced site. When groundwater was sampled in March 2000, Well MW10 revealed up to 1,300ppb TPHd and Well W-1 revealed up to 3,400ppb TPHg, 1,800ppb TPHd, and 20ppb benzene.

At this time, additional investigations are required to delineate the extent of the hydrocarbon plume. It is recommended that two additional groundwater monitoring wells be installed adjacent to the storm drain along Doyle Street. Please submit a workplan proposal to delineate the contaminant plume within 60 days of the date of this letter, or by **July 26, 2000**.

Also, in December 1999, six USTs were removed from Tank Farm #2. This office is not in receipt of a tank closure report documenting removal activities, soil and groundwater analytical results, manifests, etc. The UST Closure Report is also due by July 26, 2000. At the time of the UST removal, an excessive quantity of pea gravel in the pit prevented the collection of soil samples from the excavation. Soil borings should be advanced around the former tank excavation for the collection of soil and grab groundwater samples. This work should also be outlined in the above required workplan.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Nathan King, Safety-Kleen, 2233 Santa Clara Ave, Alameda, CA 94501

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Sent 2/2/00
cc's

20402

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

StID 1232

February 2, 2000

Ms. Suzanne Patton
AC Transit
10626 E 14th Street
Oakland, CA 94603

RE: QMR for 1177 47th Street, Emeryville, CA

Dear Ms. Patton:

I have completed review of Safety-Kleen Consulting's January 2000 *Groundwater Monitoring* report prepared for the above referenced site. That report documented groundwater sampling of onsite wells MW-1 through MW-10. Total petroleum hydrocarbon as diesel (TPHd) was detected in all wells. BTEX was detected in wells MW-6 and MW-7.

At this time, please continue with quarterly groundwater monitoring at the site. Quarterly monitoring reports (QMRs) are due 60 days upon completion of field activities. Future QMRs should also include laboratory analytical data, QA/QC, and field notes. Groundwater should be analyzed for TPHg, TPHd, TPHmo, BTEX, and MTBE. The next sampling event should be in February 2000. If Wells W1, W2 and W3 have not been decommissioned, groundwater from these wells should also be sampled and monitored on a quarterly basis.

This office is also expecting to receive a report document the removal of USTs in December 1999 and any reports of follow-up investigations conducted for the diesel release into Temescal Creek.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Brad Wright, Safety-Kleen, 2233 Santa Clara Avenue, Alameda, CA 94501

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

ROA02

July 15, 1999

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

Sue Patton
Environmental Manager
AC Transit
10626 East 14th Street
Oakland CA 94603

STUD 1232

Subject: AC Transit Yard, 1177 47th Street, Emeryville

Dear Ms. Patton:

The site visit today to the Emeryville yard was intended to be a final inspection on the modification to the emergency generator tank system and a follow-up inspection of the fuel island. Unfortunately the underground portion of the generator system was not completely accessible to visual inspection due to some difficulty in removing the manway covers. After those features are made accessible a complete and final inspection will be scheduled.

A review of the above ground portion of the tank system did reveal a need to install a flexible connection to the generator skid in case of ground movement in an earthquake. The hard piped supply line will probably break and the fueling system will fail. Also please review the operation of the day tank to assure that a malfunction of the fill control does not result in an unauthorized release of fuel or a failure of the backup electrical generator power.

The fuel island inspection demonstrated to me what a great amount of effort the staff at AC Transit have taken to improve the management of fueling area. Previous visits to the fuel island have always revealed poor maintenance and sloppy housekeeping. The new dispensers and removal of the filtering station have helped to make the area more easily manageable. But it looks to me that it is really the individuals working together to keep the fueling area in such excellent condition.

Please contact this office when the manway covers are repaired and the final inspection of the generator system can be completed. You can call me at (510) 567-6781.

Sincerely,

Robert Weston
Sr. Hazardous Materials Specialist

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 402

ENVIRONMENTAL HEALTH SERVICES

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

StID 1232

February 24, 1999

Ms. Suzanne Patton
AC Transit
10626 E 14th Street
Oakland, CA 94603

RE: **Subsurface Investigation Reports for AC Transit, 1177 47th Street,
Emeryville, CA 94608**

Dear Ms. Patton:

I have completed review of the case file for the above referenced site. Subsurface investigations were conducted at the Old Tank Farm, the Old Maintenance Building, and the Existing Diesel Tank Farm from 1986 through 1989. It appears that most of the hydrocarbon-impacted soils were removed from the Old Tank Farm and the Old Maintenance Building at that time. A significant diesel fuel release occurred at the Existing Diesel Tank Farm in 1989. The diesel release found its way into Temescal Creek. Areas of the creekbed which were contaminated were subsequently removed.

This office is not in receipt of any reports of follow-up or subsequent subsurface investigations conducted at the site and at Temescal Creek. Please submit any reports documenting final cleanup of Temescal Creek, recent subsurface activities at the existing diesel tank farm, and quarterly monitoring events conducted since 1989. In addition, quarterly monitoring/sampling should be re-instated for the site. Quarterly monitoring reports are due within 60 days upon completion of field work.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

consolidated w/ R0402
RAFAT A. SHAHID, Assistant Agency Director

January 25, 1993

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

Chiron Corporation
6455 Christie Ave.,
Emeryville, CA 94608

Re: **FIVE-YEAR PERMITS FOR OPERATION OF ONE
UNDERGROUND STORAGE TANK (UST) AT
1400 53rd St., Emeryville, CA 94608**

According to our records the above mentioned facility has not received a five-year permit to operate UST's. Please complete the following items marked below and return them to me within 30 days. The example plans enclosed should be used only as guidelines and may not meet your requirements under Title 23.

- ✓ 1. Complete UST PERMIT FORM A - one per facility. (enclosed)
- ✓ 2. Complete UST PERMIT FORM B - one per tank. (enclosed)
- 3. Complete UST PERMIT FORM C - one per tank if information is available. (enclosed)
- ✓ 4. A written tank monitoring plan. (enclosed)
- ✓ 5. Results of precision tank test(s) (initial and annual).
- ✓ 6. Results of precision pipeline leak detector tests (initial and annual).
- ✓ 7. An accurate and complete plot plan. (enclosed)
- ✓ 8. A written spill response plan. (enclosed)

Title 23 of the California Code of Regulation prohibits the operation of ANY UST without a permit. Please feel free to contact Brian P. Oliva at 510/271-4320 if you have any questions which may arise in completing the mandatory five year permit process.

Sincerely,

Brian P. Oliva, REHS, REA
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney
Rafat Shahid, Assistant Agency Director, Alameda County
Department of Environmental Health
Ed Howell/files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0402

September 19, 1990

G L. Gross
AC Transit District Emeryville
1177 - 47th St.
Emeryville, CA 94608

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

Re: Waste Minimization Assessment

Dear G L. Gross:

Your business has been selected to receive a hazardous waste minimization assessment. As you are probably aware, hazardous waste reduction has become a statewide, if not a national, issue. To address this issue at a county level, Alameda County is establishing its own Hazardous Waste Minimization Program and is planning to conduct waste minimization assessments for all hazardous waste generating facilities in the County.

We have chosen businesses in the auto repair industry to receive the first round of waste minimization assessments. It is our hope that these assessments will assist participating businesses in minimizing their hazardous wastes - and will give us further information on the best way to structure our minimization program.

One of our Hazardous Materials Specialists will be contacting you during the week of September 24 to arrange a meeting with you for an assessment of your business. During this meeting and assessment, the Specialist will work with you in examining your business's hazardous waste generating practices. The Specialist will then provide you with materials on waste reduction technology and assist you in setting up appropriate hazardous waste minimization practices.

We look forward to working with you in reducing the amount of hazardous waste your business generates. Of course, your comments and suggestions are encouraged; we need your input in order to best serve you! Please direct any comments and questions to Katherine Chesick at 415/271-4320.

Sincerely,

Edgar B. Howell, Chief,
Alameda County Hazardous Materials Division

EBH:kac

cc: Fire Department
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RC402

15 August 1989

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

5

Ann McDonald
Woodward Clyde Consultants
500 12th Street
Suite 100
Oakland, CA 94607-4014

Subject: Requested File Search Concerning 1271 45th St.
Emeryville.

Dear Ms. McDonald:

As per your written request a review has been conducted of our records concerning the general vicinity of the address which you had specified. The following information has been collected.

- (Roll 53) 1000 45th St. The Flecto Company, This facility is a hazardous waste generator and has submitted a Hazardous Materials Business Plan to this office. A five year operating permit was issued to this facility for three underground storage tanks in February of 1989.
- 1250 45th St. Equipment Associates Inc. This facility, formerly a hazardous waste generation site, is currently undergoing renovation. There is a single 5,000 gallon underground storage tank at this site for which a closure is being prepared.
- 1266 45th St. 4th Street Woodworks, This agency has no records concerning this site.
- 1270 45th St. Mesquite Products International, This agency has no records concerning this site.
- 1271 45th St. This agency has no records concerning this site.
- 1280 45th St. Tastevia Wines, This agency has no records concerning this site.
- 1290 45th St. Evan R. Inc. This agency has no records concerning this site.

Ann McDonald
Woodward Clyde Consultants
500 12th Street
Suite 100
Oakland, CA 94607-4014
File Search
15 August 1989
Page 2 of 4

(R0402) 1177 47th St. A.C. Transit Facility, A hazardous waste generator which has not yet submitted a Hazardous Materials Business Plan to this office. An interim operating permit was issued in June of 1988 for fifteen underground storage tanks at this location.

Approximately 16,000 gallons of diesel fuel was released from a leak in the delivery pipeline in April of 1989. As much as 1,000 gallons of this released fuel escaped the A.C. Transit facility tank farm and entered Temescal Creek Culvert through the storm drain system. The culvert was diked, the free product was drawn from the water surface and 180 drums of contaminated soil and absorbant pads were removed for disposal.

4060 Hollis St. United Stamping Company. This facility is listed in our records as a hazardous waste generator and a Hazardous Materials Business Plan is on record with this office.

4221 Hollis St. Morehouse Foods Inc. An underground storage tank was removed from this site in October 1987. No evidence of contamination was detected during this project.

4227 Hollis St. PG and E Facility, This agency has no records concerning this site.

4245 Hollis St. PG and E, Shop. This facility is listed in our records as a hazardous waste generator.

4246 Hollis St. Oakland Pool Supply. This agency has no records concerning this facility.

Ann McDonald
Woodward Clyde Consultants
500 12th Street
Suite 100
Oakland, CA 94607-4014
File Search
15 August 1989
Page 3 of 4

(R0286) 4525 Hollis St. PG and E Materials Distribution Facility. This site is listed in our records as a hazardous waste generator and a Hazardous Materials Business Plan has been submitted to this office. An interim operating permit for two underground storage tanks was issued to this facility in March of 1988. The California Department of Health Services is currently overseeing a remediation project on this site concerning PCB contaminated soil.

(R064) 1150 Park Ave. Pepsi Cola Bottling Plant. An interim operating permit for two underground storage tanks was issued in April of 1988. A Hazardous Materials Business Plan has been submitted to this office regarding this site.

(R02810) 1250 Park Ave. Del Monte Plant #35. This facility is currently not in operation. Five underground storage tanks were removed in March of 1989. Soil contamination of up to 500 parts per million of Total Petroleum Hydrocarbons was discovered during this project, requiring the installation of a groundwater monitoring system. This monitoring system is being sampled on a quarterly basis.

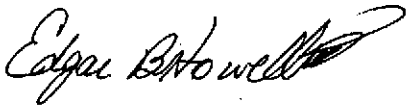
Our records contain considerable documentation regarding the sites described in this letter. Should you desire, please submit a description of any documentation that you would like to receive for a specific site. Copies of non-trade secret information in our files will be provided to you at a cost of \$1.00 per page.

Ann McDonald
Woodward Clyde Consultants
500 12th Street
Suite 100
Oakland, CA 94607-4014
15 August 1989
Page 4 of 4

This letter is limited to information available to this department and does not reflect information which may be accessible from other agencies or businesses involved with these properties. You will be billed for the provision of this service.

Please refer all further correspondence regarding this matter to, Dennis Byrne, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,



for Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:DB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0402

9 August 1989

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

11

Anthony Miller
Paradiso Construction Company
9220 G St.
Oakland, CA 94603

Subject: Groundwater Monitoring Well Locations in Emeryville.

Dear Mr. Miller:

The following is a list of groundwater monitoring well locations in the City of Emeryville. This information is being sent as per your request.

1000 41st Street	Dunne Quality Paints
(R0402) 1177 47th Street	A.C. Transit Facility
(R02496) 5800 Christie Avenue	Crowley and Herring Investments
(R01079) 5903 Christie Avenue	Weatherford BMW
(R069) 5500 Eastshore Highway	Powell Street Plaza
(R0699) 6050 Hollis Street	Francis Collins Property
(R02704) 4250 Horton Street	Artists' Cooperative
4549 Horton Street	Rifkin Properties
(R0577) 1351 Ocean Avenue	H.F.H. Limited
(R02810) 1250 Park Avenue	Del Monte Corporation
(R066) 1700 Powell Street	Mobil Oil Company
(R0254) 1800 Powell Street	Shell Oil Company
(R02822) 2000 Powell Street	Goldsmith and Lathrop Properties

Should you have any questions concerning this matter, please contact, Dennis Byrne, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,

Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:DB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



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

R0402

Telephone Number: (415) 271-4320

21 July 1988

Harold Nahler
Kaiser Engineers Inc.
1800 Harrison St.
P.O. Box 23210
Oakland, Ca. 94623

Dear Mr. Nahler:

Thankyou for presenting to our office the analytical data and site remediation plan for the AC Transit facility located at 1177 47th Street in Emeryville. A review of the submitted material indicates that the work conducted to remove all heavily contaminated soil for bioremediation treatment has been sufficiently thorough and conducted in a manner consistent with guidelines established by the Regional Water Quality Control Board. Therefore, the Alameda County Department of Environmental Health, Hazardous Materials Division, has no objection to your pursuing construction operations at this location as detailed in your report to us.

We anticipate that you will keep us informed of all data derived from the remediation and monitoring well activities progressing at this site. In the near future, one of our inspectors will conduct an overview of the facility.

If you have any questions concerning this matter, please contact, Dennis Byrne, Hazardous Materials Specialist, at (415)271-4320.

Sincerely,

for Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:DB

cc:Lisa McCann, RWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

DAVID J. KEARS
~~XXXXXXXXXXXX~~ Agency Director



SITE: 1177 47th St.

R0402

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

December 12, 1986

Mr. Steve Whitehead
Kaiser Engineers
508 - 16th Street
Oakland, CA 94612

Dear Mr. Whitehead:

We are in receipt of your plan of correction for A. C. Transit facility in Emeryville, CA. The plan is acceptable in general, but we must receive copies of:

- (1) All completed manifest
- (2) Analysis of samples taken to assure all contaminated soil exceeding 1,000 mg/kg is removed
- (3) Well log and results of monitoring well samples taken

If you have any questions, please contact Edgar B. Howell, III, Senior Hazardous Materials Specialist, at 874-7237.

Sincerely,

Rafael A. Shahid, Chief
Hazardous Materials Program

RAS:mn-c

cc: Dwight Hoenig, DOHS
Peter Johnson, RWQCB
Gerald Winn, Director, Environmental Health