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October 5, 1995

#565

Dennis Mishek
Senior WRCE
San Francisco Regional
Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, CA 94612

SUBJECT: ADDENDUM TO REPORT OF WASTE DISCHARGE APPLICATION FOR DISCHARGE OF CLEAN TREATED GROUNDWATER FOR PACIFIC ELECTRIC MOTORS AT:
1009 66th Street, Oakland, California

Dear Mr. Mishek:

This letter is a request to amend our recently submitted ROWD application to discharge treated water derived from an underground storage tank excavation, at the above-mentioned site, by percolation. Originally, this was a viable method of discharge as very little water was generated in the tank pit during overexcavation due to the very tight clays encountered (i.e., the upper 15 to 20 feet of soils consist of mostly clay fill materials). **We are now proposing to discharge the treated water generated onsite by discharge to the storm drain**. This will require a temporary NPDES permit instead of the General WDR for percolation to groundwater we originally requested.

The purpose of this discharge request is the following:

1. To temporarily dewater the former UST pit in order to gain temporary access with an excavator backhoe to the remaining contaminated soil still left at the bottom of the pit.

2. To remove the contaminated groundwater that would otherwise have to be extracted by an expensive and less effective pump-and-treat groundwater treatment system.

This proposed activity must be initiated immediately because of the following:

1. The coming rains will seriously hamper current remediation efforts and will generate more water to treat than currently exists.

2. The existing tank pit poses a health and safety threat. Our client has already suffered numerous break-ins and vandalism activities even though the site has been properly fenced and surrounded with caution tape. Unnecessary delays increase the risk that children from the housing project located adjacent to the tank pit could find their way into the pit and suffer injury.

The potential delay of greatest concern is the Board Resolution which requires that we obtain a rejection letter from East Bay Mud before you will process our ROWD application. We thought this was resolved approximately two weeks ago after a conversation between Sum Arigala and myself (Frank Goldman), where we agreed that a letter from EBMUD was not necessary; that a statement in our ROWD Application to the effect that we had contacted Dierdra Mana of EBMUD and that their standard processing time is 60 days. During our phone conversation on October 4, 1995, you stated that we, again, needed a letter from EBMUD. We spent a considerable amount of time producing a ROWD application at the direction of Sum Arigala when we could have at least begun producing an application for discharge to EBMUD. In fact we spent approximately two weeks attempting to acquire some direction and guidance from Dale Bowyer (i.e. he was unavailable unbeknownst to us that his wife was having a baby), as well as his superiors and co-workers (i.e. most of whom were on vacation). We even met, (onsite), with Joe Trapp of the City of Oakland Storm Water Runoff section, onsite, who stated that they have no problem with the discharge and will provide onsite inspection during discharge to allay any concerns that Board staff may have.

The best and most practical way to resolve this matter would be to call Diedre Mana's supervisor, Tom Paulson at (510) 287-1630 and check for yourself how long it takes for them to process the application at EBMUD. Putting us through the exercise of producing a redundant application for EBMUD would only serve to use up precious time when all that is needed is a simple phone call. Another issue we discussed was that the cost of discharging to EBMUD ($0.35 per gallon would be paid by the taxpayer (e.g. the UST clean-up fund) and our client (PEM) which is a small struggling business which has been in Oakland for at least thirty five years. A discharge of clean treated water to the storm drain would be the most practical method for all concerned.

REITERATION OF RECENT ACTIVITIES

As the overexcavation procedure progressed, a sandy zone of highly productive groundwater recharge was encountered just before we were able to complete our excavation of the last remaining foot of contaminated soil. We must now drain the water remaining in the pit at a rate of 1000 gallons per minute for approximately one hour to completely dewater the pit and then continue to pump at a rate of approximately 100 gallons per minute for two hours to allow our excavator to remove the remaining contaminated soil from the bottom of the pit. The pumped pit water (i.e. approximately

72, 000 gallons) will be diverted to four-20,000 gallon baker tanks onsite. Since room is very limited onsite, we have only been able to fit a total of five-20,000 baker tanks onsite, of which, two are already filled with water. One of the two tanks is presently filled with clean filtered water and the other tank is filled with water contaminated with low levels of gasoline, motor oil ranged organics, and acetone. Until we obtain a permit to discharge clean treated water from at least one 20,000 gallon Baker tank, we will not have the capacity to hold the 72,000 gallons of water expected during our proposed pumping operation. It is expected that a total of 112,000 gallons of water, generated during the dewatering operation and the 40,000 gallons already stored onsite, will have to be treated and discharged.

CONTAMINANTS TO BE ANALYZED BEFORE DISCHARGE

As already stated in our original ROWD application we have an approved Remedial Action Plan with the County of Alameda LOP Program through Barney Chan. We also have performed a subsurface investigation as well as a limited environmental audit to determine the types of contaminants that could possibly exist in the pit water. We have excluded PCBs and chlorinated solvents through thorough testing of soil and pit water samples and have verified that gasoline, motor oil ranged organics, and acetone are of concern. We have treated one 20,000 gallon Baker tank by carbon filtration which could still have some acetone (i.e. a constituent we neglected to analyze) and 60 ppb of TPH(g) -10 ppb above the detection limit). At present, we are retreating the entire batch of the 20,000 gallons of treated water until we attain non-detectable levels of all constituents of concern.

HYDROGEOLOGIC CONDITIONS

The original subsurface investigation identified a few isolated thin sand lenses of less than approximately one foot in thickness within the predominantly clay fill and natural soils encountered. These sands are most likely perched channel deposits of Undivided Quaternary sands with Temescal and San Antonio Formation sands. Due to the extreme heterogeneity of the soils encountered, we could only predict natural recharge rate which could be encountered in the pit, based on rates of recharge encountered in borings and during the initial overexcavation process. These preliminary investigations revealed very low recharge rates which were more than adequate for the proposed over excavation procedure. The hydrogeologic conditions (e.g. boundry and recharge conditions, perched water, degree of confinement) encountered at this time cannot be ascertained until a pump test is designed and performed. Even though the additional rate of recharge has hampered our operation it would be only a temporary inconvenience which could be remedied with a discharge permit to the stormdrain and may actually expedite the groundwater remediation process by more quickly flushing out contaminated zones of soil than the usual pump and treat systems.

ISSUES TO BE ADDRESSED IN THIS ADDENDUM

1. A call by Board staff to EBMUD verifying that there is a 60 day review process which will not be completed in time to finish the current remediation phase in time to prevent potential threats to health and safety.

2. A call by Board staff to W.A. Craig, Inc, as to the amount of money the fee for this waste discharge will cost. A FAX of the standard rate sheet for discharge fees. A mailing of the section in the Administrative Procedures Manual pertaining to Board staff processing of ROWD applications for WDRs and general WDRs for percolation to groundwater, general temporary NPDES permits for discharges to stormdrains and other surface waters of the state, and the Board Resolution which states that the process by which a potential discharger must go through in order to satisfy Board policy requiring a rejection letter from EBMUD before the ROWD application can be processed by Board staff. If it is too inconvenient to collect up the information to be requested, we will then need an immediate appointment to review and copy the aforementioned files in accordance with the Public Records Act.

3. An official acknowledgment by Board staff that our current ROWD application is now for a Temporary NPDES permit.

4. An acknowledgment from Board staff that the levels of treatment for the water stored in Baker tank No. 1 are acceptable for discharge. (New Lab results forthcoming) If not acceptable, please explain, and direct us on satisfying deficiencies.

5. Note that all analytical testing of water before and after treatment will include testing for acetone which was not mentioned in our original ROWD application.

If you have any questions in regard to this correspondence, please call us at (707) 252-3353.

Sincerely,

W. A. CRAIG, INC.

Franklin J. Goldman, R.G. #5557
Manager of technical Services

William A. Craig II
President, R.E.A. 01414

cc: Terry Knox, Pacific Electric Motors
Barney Chan, County of Alameda, Local Oversight Program
Tom Paulson, East Bay Municipal Utility District