

HOEXTER CONSULTING, INC.

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Palo Alto, California 94303-4180

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ATTENTION - see below

PROJECT 1570 Seminary Ave
Oakland CA

JOB NO. E-10-1C-261C

DESCRIPTION 7/2/99 letter re Project Review

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BY [Signature]
David F. Hoexter

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Alc Co

Geology / Engineering Geology / Environmental Studies

**HOEXTER CONSULTING, INC.
DAVID F. HOEXTER, RG/CEG/REA**

734 Torrey Court
Palo Alto, California 94303-4160

(650) 494-2505 (ph & fax)

July 2, 1999

E-10-1C-261C

HCProjLtr.Seminary/RWQCB/Headley1

Chuck Headlee
California Regional Water Quality Control Board
San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, CA 94612

**RE: REQUEST FOR REVIEW OF PROJECT STATUS
AND SITE CLOSURE
STID 553 - GRIMIT AUTO AND REPAIR
1970 SEMINARY AVENUE
OAKLAND, CALIFORNIA**

Dear Mr. Headlee:

Thank you for taking the time to discuss the above-referenced site this morning. As I mentioned, the site, a former gasoline station, is owned by the former operator, Doyle Gritmit. The site is included in the State UST Fund, and is under the jurisdiction of Eva Chu of the Alameda County Health Department. Ms. Chu referred us to you.

The essential "issue" is that Mr. Gritmit would like to obtain closure of the site. He wishes to sell the property to his tenant, who operates an auto electric repair shop on the premises and lives in the immediate neighborhood. Mr. Gritmit is elderly, and would like to complete the sale as soon as possible. However, the tenant cannot currently buy the property, because we do not have "closure" and thus he cannot obtain a loan. Nor does he wish to undertake the liability of a site which may in the future require remediation, and the State Fund will not transfer from Mr. Gritmit to a new owner.

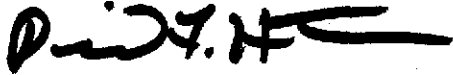
As we discussed, an ASTM RBCA Tier Two evaluation was conducted, and after review, Alameda County Health determined that remediation would not be required. Alameda County Health currently requires bi-annual (twice a year) ground water monitoring of the nine existing wells. Ms. Chu has informed us that the Regional Board cannot grant closure due to the residual presence of solvents from the former waste oil tank [levels of some compounds exceed State of California maximum contaminant levels (MCLs)]. Thus, the owner cannot obtain closure, and because the State Fund will not fund remediation without local agency agreement, cannot conduct the remediation necessary to complete a sale.

We therefore request your review of the site, with a goal of obtaining closure. To assist your review, I enclose a copy of the most recent quarterly ground water sampling report, and a brief site history. We can provide copies of previous reports, if necessary.

Thank you for your assistance in this matter. Please call the owner, Doyle Gruit, at (510) 357-5133, Ms. Chu, or the undersigned to further discuss the site.

Very truly yours,

HOEXTER CONSULTING, INC.



David F. Hoexter, RG/CEG/REA
Principal Geologist

Enclosure: Summary of Investigations and Remediation, rev. 7/2/99

Copies: Alameda County Health: ~~██████████~~
Doyle Gruit

SUMMARY OF INVESTIGATIONS AND REMEDIATION

**CALIFORNIA UST FUND REIMBURSEMENT
CLAIM NO. 006378
1970 SEMINARY AVE, OAKLAND, CALIFORNIA**

REIMBURSEMENT SUBMITTAL NO. 4

INTRODUCTION

The purpose of this document is to provide a summary of events related to the remediation and investigation of the referenced site, in order to assist the State UST Cleanup Fund in reviewing the attached reimbursement package. The following information has been obtained from the claimant, regulatory agency staff, contractors and other individuals, and from various reports completed by contractors and consultants. This document has been prepared as a courtesy to the claimant for the purpose of his claim only. The information is correct to our knowledge, although partially based on information obtained from others.

Note that referenced documents related to the current (April, 1998) reimbursement submittal are enclosed with the applicable invoices.

CHRONOLOGY

Site History

Four - approximately 550 gallon steel tanks were installed on the site in the 1930's. These or replacement tanks were used until fueling service was discontinued, on September 30, 1989. Three of the tanks were used to store gasoline. The fourth tank was used to store waste oil. To our knowledge, there are currently no operating or additional abandoned underground tanks on the property. The site is currently used for automotive repair; the property is still owned by Mr. Gritit.

Reimbursement Claim No. 1 (June, 1994)

Site Closure and Excavations

Site closure was initiated on November 17, 1989. Closure was conducted by Petro Tech, of Santa Rosa, California, under permit to Alameda County, Department of Environmental Health. Mr. Larry Seto of the Alameda County Department of Environmental Health witnessed the tank excavation.

The tanks were constructed of steel. Holes were observed in two of the tanks. The inerted tanks were transported under manifest by H & H Ship Service, San Francisco, California, and disposed of at the Levin Metals Corporation, Richmond, California, as scrap metal. Soil in the excavation appeared stained. Soil was not excavated, or excavated soils were temporarily returned to the excavations. Ground water was not encountered. Seven confirmation soil samples were obtained, five from the gasoline USTs and two from the waste oil tank location. The samples indicated the presence of contaminated soil.

The excavations were backfilled with clean, imported soils. The excavations were not paved. There were no reported unusual problems encountered during the tank closure or site excavation, other than the limited area available for excavation.

Analytical test results of the confirmation testing are discussed in previous reports on the site, particularly Kaldveer Associates' September 28, 1990 and Hoexter Consulting's March 23, 1994 subsurface investigation reports.

Initial Subsurface Investigation

Initial subsurface investigation was conducted by Kaldveer Associates during August, 1990, and documented in a September 28, 1990 report. The Kaldveer investigation consisted of advancing three soil borings, two in the vicinity of the former waste oil tank, and one through the backfill of one of the fuel tanks (EB-1, 2, and 3; and drilling and installing one ground water monitoring well at a fourth location (MW-1). An initial sample round of the monitoring well was conducted by Kaldveer for the 1990 report.

Additional Excavation of Waste Oil Tank

In May, 1991, Petro Tech overexcavated the waste oil pit. A total of approximately 20 cubic yards of soil was removed and stockpiled on site. Further excavation was limited due to the immediate proximity of the adjacent property line and service building. Water was not present in the pit. The four side walls and bottom were sampled (total of six locations). The pit bottom was sampled at two locations. A single composite sample of the stockpile was also obtained. The contaminated soil was disposed of by the Remco, Richmond, California facility as "non-hazardous petroleum contaminated soils". The soil confirmation samples indicated that contamination soil was still present.

Second Phase Subsurface Investigation

Hoexter Consulting provided three subsequent quarterly ground water sampling events, in January, April, and August, 1982. Reports were issued in February, May and August, 1992.

Based on requests of the Alameda County Health Department, Hoexter Consulting conducted a preliminary subsurface investigation during January and February, 1994, and issued a report dated March 23, 1994. The investigation included the installation of two additional monitoring wells, MW-2 and MW-3, bringing the total number of wells at the site to three. Relatively low levels of petroleum hydrocarbons were detected in the two regional down gradient wells. The report recommended, due to the elevated levels of petroleum hydrocarbons near the source area but relatively low level of beneficial use of ground water in the vicinity and the relatively low levels of detected compounds further from the source, that consideration be given to a passive bioremediation program at the near-source monitoring well.

Reimbursement Claim No. 2 (April, 1996)

Continued Monitoring and Subsurface Investigation

Hoexter Consulting continued to monitor ground water conditions in the three wells. Additional ground water monitoring reports were issued September, 1994, January, 1995, May, 1995, November, 1995. Contaminant levels in the near-source well (MW-1) continued to be elevated, although reduced from initial readings. The two down-gradient wells gradually increased in contaminant levels, although they remained relatively low.

After discussions with the Alameda County Health Care Services representative, Hoexter Consulting recommended that additional investigation be conducted, to further evaluate the residual levels of contaminants in the soil, as well as the apparent presence of both "perched" and "deeper" contaminated ground water. An initial conceptual work plan and status letter was prepared January 26, 1995. The August 9, 1995 work plan reflects further evaluation, and included soil borings, numerous monitoring and vapor extraction wells, and vapor extraction testing and preliminary remedial/source removal design. This work reflected the Hoexter Consulting proposal to the owner, Doyle Gruit, dated June 26, 1996, which was verbally approved by C. Stevens of the State Fund, in a July 26, 1996 telephone call to Mr. Gruit. The work plan was subsequently approved by Alameda County Health, in a letter dated November 8, 1995. Hoexter Consulting subsequently issued a work plan addendum (January 14, 1996), which was approved by Alameda County in a January 19, 1996 letter. The County response and approval noted the recently issued Lawrence Livermore study and subsequent SWRCB and SFRWQCB guidelines, and requested postponement of the vapor extraction testing and preliminary remedial design phases of the investigation, pending results of a reduced scope investigation. Hoexter Consulting revised its cost estimate for a reduced scope of work (February 29, 1996). The exploratory boring locations were identified in the January 14, 1996 Hoexter Consulting addendum letter. The three well locations were determined in a field meeting between David Hoexter and Dale Klettke (Alameda County) on the day the exploratory borings were drilled (March 8, 1996), and documented in a Hoexter Consulting letter dated March 11, 1996.

The field investigation initially consisted of four soil borings by Precision Sampling, Inc., on March 8, 1996. The borings were continuously sampled to depths of 7, 22, 22, and 23.5 feet. Although slotted PVC casing was placed in the three deeper borings, only one produced water. Selected soil samples and one grab ground water sample were analyzed as follows: six samples for TRPH/oil, five samples for halogenated volatiles (EPA 8010), and 10 samples for TPH-G/BTEX. Three ground water monitoring wells (at different locations than the soil borings) were subsequently installed by PC Exploration, Inc., on March 18 and 19, 1996. The three wells were installed to depths of 20, 35 and 35 feet. Selected soil samples were analyzed as follows: three samples for TRPH/oil, and six samples for TPH-G/BTEX. The three wells were then developed by Hoexter Consulting. All six wells were then sampled by Hoexter Consulting, and the samples analyzed as follows: six samples for TRPH/oil, six samples for halogenated volatiles (EPA 8010), and six samples for TPH-G/BTEX. All compounds were detected. The investigation was then documented in a detailed report, which included a preliminary ASTM RBCA evaluation. California Maximum Contaminant Levels (MCLs) and ASTM RBCA risk based screening levels (RBSLs) were exceeded at the wells located on the site periphery. The report is dated April 22, 1996. Invoicing included in this reimbursement request covers work through completion of the April 22, 1996 report.

Reimbursement Claim No. 3 (April, 1997)

Claim No. 3 includes continued ground water monitoring; a preliminary remedial alternatives evaluation; dual vapor extraction pilot studies; and a corrective action plan (CAP). Contaminant levels remained elevated, and benzene levels were shown to be on the order of four orders of magnitude greater than the acceptable RBCA level. Evaluation of remedial alternatives resulted in a recommendation of oxygen releasing compounds pilot study and installation of supplemental field investigation.

Preliminary Evaluation of Remedial Action Alternatives

At the request of the Alameda County Health Department, Hoexter Consulting evaluated remedial alternatives. Alternatives included no remedial action; interim remediation; ground water extraction; vapor/ground water co-extraction; and vapor/ground water co-extraction with air sparging or ORC. The evaluation concluded that vapor-ground water co-extraction with air sparging or ORC was the optimum remediation method. The report recommended that vapor extraction feasibility testing be conducted, and that a corrective action plan be prepared.

Continued Ground Water Monitoring

Also during this period, two rounds of ground water monitoring were conducted. The monitoring indicated continued elevated levels of gasoline, oil, and BTEX compounds, as well as the presence of HVOC.

Vapor Extraction Feasibility Testing and CAP Preparation

The dual vapor extraction feasibility testing was then conducted by Terra Vac Corporation. Although contaminants were successfully removed during the test, Hoexter Consulting concluded in its subsequent CAP that oxygen releasing compounds (ORC) in conjunction with a low-level bioventing program be initiated. The Hoexter report recommended a pilot study at the most heavily impacted well, and installation of additional monitoring points.

Reimbursement Claim No. 4 (April, 1998)

Claim No. 4 includes supplemental subsurface investigation; two rounds of ground water sampling; RBCA Tier Two evaluation; report preparation; Tier Two addendum evaluation.

Subsurface Investigation

The subsurface investigation consisted of installing three additional monitoring wells, bring the site total to nine wells. The three wells were developed, and elevations surveyed. All nine wells were then sampled, after venting the wells for two days to allow for equilibration of the ground water levels within the wells (site history indicates that this process takes several days). The wells were sampled. No report.

Well Sampling

The nine wells were purged and sampled. Again, the wells were vented for several days prior to sampling, to allow for ground water equilibration. No report.

Preliminary RBCA Tier Two Evaluation

A detailed RBCA Tier Two evaluation was conducted. The evaluation concluded that remediation of the site is warranted. Alameda County Health verbally requested re-evaluation, utilizing lower (average, or more representative) input values. The supplemental evaluation, presented as an addendum letter, again indicated that remediation is warranted. Alameda County has to date not responded to this addendum letter and Hoexter Consulting's recommendation to initiate remediation.

CURRENT STATUS

Alameda County Health Department reviewed a revised RBCA Tier Two evaluation, utilizing representative values for the various detected compounds. All compounds were less than respective risk based screening levels. The County approved the findings of the evaluation, and requested continued bi-annual (twice each year) ground water monitoring. Remediation was not requested or required.

The most recent ground water monitoring was conducted in April, 1999, and a report issued May 12, 1999. The next round of sampling is scheduled for October, 1999.

CLOSING

Prepared by Jack Forsythe, with consultations and July 2, 1999 update by David F. Hoexter, for D. Gruit UST claim. Much of the included information is gathered from various sources, and is accurate to the best of our knowledge.

Jack Forsythe

David F. Hoexter