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April 26, 1988

Mr. Storm Goranson
Hazardous. Materials Specialist
County of Alameda
County Department of Environmental Health
470-27th Street, Room 322
Oakland, CA 94612

RE: Initial Remedial Measures at Union Pacific Motor Freight Facility located at 1750 Ferro Street, Oakland, California.

Dear Mr. Goranson:

HUNTER is submitting this Initial Remedial Plan for Union Pacific Railroad (Union Pacific) in response to oil identified in an excavation during the removal of a 3,000 gallon underground bulk oil storage tank located at the Union Pacific Motor Freight Facility (Oakland Motor Freight) located at 1750 Ferro Street in Oakland, California. Union Pacific is committed to recovery of the oil and is continuing to obtain additional data for input into the evaluation and selection of final remedial alternatives. Union Pacific would like to begin the initial remedial action to recover oil from the excavation in conjunction with backfilling of the excavation to assure stabilization of a maintenance building adjacent to the excavation and to remove the current hazard of an open excavation in the proximity of the active maintenance building.

## BACKGROUND INFORMATION

Results of tank integrity tests indicated that product lines leading from a 3,000 gallon bulk oil storage tank were not tight. In late November, Union Pacific requested the removal of the bulk oil storage tank and associated piping to eliminate the system as a discharge source of oil. On 17 December, 1987, HUNTER removed the tank and associated piping and removed approximately 350 gallons of oil from the excavation by a vacuum truck (Figure 1).

In the process of soil excavation, material exhibiting no field indications of contamination was separated and stockpiled on site. Soil suspected of containing high concentrations of petroleum was placed on plastic sheeting to prevent the migration of contaminants into the subsurface. The contaminated soil will be properly disposed by Union Pacific.

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At various depths within the excavation, waste material and debris were identified (i.e. rubble, old road beds, palm trees, etc.). Near the pit bottom, at a depth of 12 feet, the soil consisted of sandy clay. The precise depth to ground water was unknown, therefore, in order to minimize the potential for contamination to migrate to lower depths, this sandy clay layer was not penetrated.

Oil was observed entering the pit from 7 locations along the sidewalls of the excavation. A majority of this inflow occurred from 4 points shown on Figure 1. At location 1, a continuous low flow occurred at a depth of 10 feet. At location 2, a low flow of reddish oil and a dark oil occurred in the pit at depths of 3 and 10 feet, respectively. The largest flow occurred at a depth of 10 feet along the southern face of the pit at locations 3 and 4.

on 16 February 1988, HUNTER personnel sampled the fluid in the excavation for contamination analysis screening. Samples were collected and analyzed for polychlorinated biphenyls (PCB's); California Administrative Code (CAC) metals; benzene, toluene, and xylene; and total petroleum hydrocarbon (TPH). The analyses indicate the fluid in the excavation is oil. No other organics were identified. Of identified CAC metals, lead was the only metal identified above the Soluble Threshold Limit Concentration of 5 mg/l as stated in the CAC, Title 22 - Social Security, Division 4 - Environmental Health, Article 11 - Criteria for Identification of Hazardous and Extremely Hazardous Wastes.

## INITIAL REMEDIAL PLAN

HUNTER has developed this initial remedial action, to initiate recovery of oil from the excavation in a manner that will stabilize the maintenance building, eliminate the current safety hazard of an open excavation in the active maintenance area and allow continued operation of the maintenance building during site activities. Construction of a large diameter well in the current excavation and installation of an oil pumping system will allow continued use of the site during the performance of the initial remedial action. The excavation associated with the removal of the 3,000 gallon bulk oil underground storage tank will be backfilled in order to eliminate the open excavation as a safety hazard and to eliminate the possibility of instability of the building foundation. This initial remedial action will be conducted in conjunction with removal of an oil-water separator system and two waste oil tanks.

Prior to backfilling the excavation, a large diameter well will be constructed in the excavation.

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caning will be completed to a depth of 4 feet beneath the bottom of the current excavation. The excavation will then be backfilled with gravel to a depth of approximately 8 feet. The remainder of the excavation will be filled with clean soil, recompacted, and re-surfaced with concrete. A 36-inch OD concrete manhole with a steel cover will be placed over the well for protection. An extraction system will be installed after the replaced concrete surface has cured.

A fluids pumping system will be installed to remove oil from the large diameter well into a holding tank located on site. Fluids stored in the tank will be disposed of in accordance with federal, state, and local regulations. Final design of the system will be based on anticipated discharge from the large diameter well.

The pumping system may consist of a compressed air operated, diaphragm pump placed in the bottom of the large diameter well. The pump would be operated by a compressed air supply, with a pump discharge line delivering fluid to the storage tank. If it is determined that an API separator currently active on site is the most effective method for disposal, documentation indicating the system is approved and currently in regulatory compliance will be supplied to the County.

After the initial remedial system is operating, a summary report will be prepared and submitted to the County for approval. If you have any questions, please do not hesitate to contact me at 714-964-8722.

Sincerely,

Hunter Environmental Services, Inc.

Robert Traylor Senior Scientist

enclosure

cc:

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