



SENT 04-08-04

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

RO0000437

April 5, 2004

Ms. Mary Grace Houlihan
Signature Properties
4670 Willow Road, Suite 200
Pleasanton, CA 94588

**Subject: Fuel Leak Case #RO0000437, Glascock Ave Warehouse, 2901 Glascock Ave,
Oakland, CA 94601**

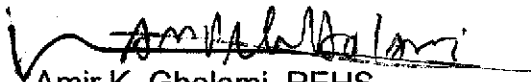
Dear Ms. Houlihan:

Per our joint meeting with Ms. Betty Graham and Mr. Roger Brewer of Regional Water Quality Control Board (RWQCB) dated March 24th, 2004, Alameda County Environmental Health (ACEH) office is transferring the above subject case to RWQCB as of April 5th, 2004.

All further remedial activity oversight will be performed by RWQCB. Please ensure that RWQCB is aware of all activities regarding the above subject site.

Should you have any questions and or concerns please do not hesitate to contact me at 510-567-6876.

Sincerely,


Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Peter Langtry, Lowney Associates, 167 Filbert Street, Oakland, CA 94607
D. Drogos, A. Gholami



9-03

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

RO0000437

October 9, 2003

Ms. Mary Grace Houlihan
Signature Properties
4670 Willow Road, Suite 200
Pleasanton, CA 94588

Subject: Fuel Leak Case #RO0000437, Glascock Ave Warehouse, 2901 Glascock Ave, Oakland, CA 94601

Dear Ms. Houlihan:

Alameda County Environmental Health (ACEH) staff has reviewed the "Upcoming Environmental Activities dated August 29, 2003," "Site Summary Report, dated March 6, 2003," "Soil Sampling Plan Results Model Building Pad, dated September 5, 2003," and "Soil Sampling Results, dated September 5, 2003," prepared by Lowney & Associates (Lowney). Additionally, there have been numerous on and off site meetings between this agency, the Regional Water Quality Control Board (RWQCB), and your representatives to address the subject site. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1- Soil and groundwater sampling-** We concur with your proposed soil and groundwater sampling locations in the vicinity of MW-2, B-2, MW-5, B-9 and SB-7. We also request that additional borings be placed in the vicinity of MW-1, which detected up to 35,000 ppb TPHd, 5,520 ppb TPHg and 26,000 ppb TPHmo and in the vicinity of SB-3 and SB-8, which had historic observation of NAPL in soil. We concur with your proposal to sample within the shallow soil (approximately 3 feet bgs). Regarding deeper samples within these borings, we note that NAPL in soil was detected in these areas at depths of 12' to 15' bgs predominately in sandy and gravelly units. We request that you analyze samples from these geologic units rather than the depths proposed in your workplan and from the bottom of the borings. Please note, to meet sampling scenario, you may need to complete your borings to depths greater than 15' bgs. Please submit the results of your work in the sampling report requested below.
- 2- Cleanup Goals-** We generally concur with the clean up goals as presented in Lowney's "Site Summary," dated March 6, 2003. Additionally, below depths of 7 feet, we request that you cleanup areas of gross contamination (free product or soil with TPH>5,000 ppm) in apparent source areas. Please note that this work may require you to clean up to depths below the water table.
- 3- Model Building Pad-** We have reviewed the Soil Sampling Plan and Analytical Results for the Model Building Pad and concur with your proposed development plans for this area.

- 4- **PCB and Metal Sampling Areas-** We generally concur with your proposal to excavate soil in these areas until cleanup goals for COCs are reached. Please submit the results of your work in the sampling report requested below.
- 5- **Lead Contamination-** We Concur with your proposal to remove contaminated soil exceeding the clean up goals. Please submit the results of your work in the sampling report requested below.
- 6- **Contamination Along the Shoreline-** During ACEH's September 17, 2003, visit we concurred with your field proposal to excavate areas of NAPL and gross soil contamination. Please submit analytical results from soil samples collected upon completion of excavation activities in the sampling report requested below. Include a proposal for additional work if the cleanup goal for the COC's are not reached.
- 7- **Groundwater Monitoring Network-** A groundwater monitoring network is needed to evaluate whether groundwater at your site exceeds the ecological buffer zone cleanup goals. Please submit your proposal for installation and monitoring of these wells in the workplan requested below. We recommend that your proposal be consistent with the adjacent Derby site, which is also part of your development project.

TECHNICAL REPORT REQUEST

Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

November 3, 2003 Sampling Report

November 3, 2003 Work Plan

Should you have any questions, please call me at 510-567-6876.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Peter Langtry, Lowney Associates, 167 Filbert Street, Oakland, CA 94607
D. Drogos, A. Gholami

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



01-09-02

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

January 8, 2002
StID 1138/ RO0000437

Mr. Gary Martz
ICONCO
303 Derby Ave.
Oakland CA 94601

Re: 2901 Glascock Street Property, Oakland CA 94601

Dear Mr. Martz:

Our office has received and reviewed the Third and Fourth Quarter monitoring reports for the referenced property prepared by the IT Group. As you are aware, your consultant believes that the elevated gasoline, diesel and motor oil concentrations reported during the 3/01 and 6/01 sampling events may have been a result of laboratory error rather than indicating a change in site conditions. Therefore, my request for additional site remediation is stated as being not warranted. The recent 11/01 sampling event performed by a new laboratory yielded low contaminant levels supporting this theory. Because of these results, our office agrees that groundwater monitoring should continue to confirm this theory. Oxygen releasing compound (ORC) socks should be replaced as necessary in the appropriate wells at the site. After two additional groundwater samplings, you may continue on the prior program agreed upon at the Water Board meeting, ie removal of the ORC socks and an additional year of monitoring to establish the concentration trend.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. A. Lehane, IT Corporation, 1921 Ringwood Ave., San Jose, CA 95131-1721
2901 GlascockSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



9-28-01

September 27, 2001
StID 1138/ RO0000437

Mr. Gary Martz
ICONCO
303 Derby Ave.
Oakland CA 94601

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

Re: 2901 Glascock Street, Oakland CA 94601, Underground Tank Investigation

Dear Mr. Martz:

Our office has received and reviewed the September 4, 2001 Second Quarter Monitoring report prepared by IT Corporation. Although the results of this sampling are within the historical highest reported concentrations, they are significantly higher than results immediately preceding this sampling event. They are also much greater than the recommended clean-up levels outlined in the San Francisco Airport Water Board order. I recommend that you review my November 16, 2000 letter to Mr. Richard Croop, which summarizes items discussed in a Water Board meeting with Mr. Croop, Mr. Chuck Headlee of the Water Board and Mr. Lehane of IT Corporation. This meeting gave a schedule and path for site closure.

Based upon the reported Second Quarter analytical results, it appears that residual petroleum contamination remains in soil and continues to leach into groundwater. This contamination will require remediation before the desired clean-up levels can realistically be met. It will also require more than just the replacement of the oxygen-releasing compound (ORC) socks in the impacted wells as recommended by IT Corporation. Originally, the amount of ORC added through injection into borings near the petroleum impacted areas was determined to be the amount necessary to prevent the migration of the petroleum plume. This assumed a limited amount of residual contamination, which would be depleted over time. If this were the case, groundwater concentrations would decrease over time. Since this is not happening, additional remediation is necessary to treat the entire amount of residual contamination. **Please discuss remedial options with your consultant and provide a work plan for additional site remediation within 30 days or no later than October 29, 2001.** Presently, the conditions necessary to proceed toward closure do not exist.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. Lehane, IT Corporation, 1921 Ringwood Ave., San Jose, CA 95131-1721

Addrem2901Glascock

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



11-17-00

RO437 (1138A; 0)

PO2842 (9)

November 16, 2000
StID # 1138

Mr. Richard Croop
Glascock Street Properties
C/o E. B. Field Company
436 14th St., #805
Oakland CA 94612-1394

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

Re: Water Board Meeting for 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Croop:

This letter serves to summarize my understanding of the status and future requirements for the above referenced site as discussed in our November 14, 2000 meeting at the Regional Water Quality Control Board (Water Board). The following items were discussed:

- One year of quarterly groundwater monitoring was suggested. The addition of oxygen releasing compound (ORC) in the form of socks in wells and as a slurry injection is believed to require this additional treatment time. To monitor the residual amount of ORC in the socks, the dissolved oxygen reading prior to purging will be used to determine when the socks should be replaced.
- After the year of monitoring, the ORC socks will be removed and an additional year of quarterly monitoring will be done to verify stable or decreasing conditions.
- Tentative cleanup levels were discussed. The Tier 1 diesel concentration of 640 ppb in groundwater from the San Francisco Airport order was proposed. Although this is the primary chemical of concern, please be aware that gasoline, BTEX (benzene, toluene, ethyl benzene and xylenes) and motor oil have also been reported in groundwater and should also be evaluated to the Airport numbers. MTBE, which has been found, is likely from an off-site source.
- Dissolved oxygen readings will be taken before and after purging and sampling to demonstrate that the groundwater samples are representative of actual groundwater conditions.
- Bio-parameters are to be tested in forthcoming monitoring events. In addition to dissolved oxygen, please run the following parameters; oxidation-reduction potential, nitrates, sulfates and ferrous iron. Naturally, an evaluation of these bio-indicator results should be included in your monitoring reports.
- There will be an attempt to research several statistical trend analysis methods including linear regression and Mann Kendall analyses. The recommended method, based on the research, should be used to determine trend. If a stable or decreasing trend of concentrations less than the clean-up requirement is not shown, active remediation will be required.

Mr. R. Croop
2901 Glascock Ave., Oakland 94601
StID # 1138
November 16, 2000
Page 2

Please contact me at (510) 567-6765 if you have any comments or questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. Lehane, IT Corporation, 1921 Ringwood Ave., San Jose, CA 95131-1721

Mr. C. Headlee, RWQCB

Mr. J. Weber, ICONCO, 303 Derby Ave., Oakland CA 94601

Stat2901Glascock

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



10-26-00

RO 2892
RO# 437

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

October 26, 2000
StID # 1138

Mr. Richard Croop
E. B. Field Company
436 14th St., Room 805
Oakland CA 946112-1394

Re: Status of Environmental Investigation at 2901 Glascock Ave., Oakland 94601

Dear Mr. Croop:

This letter is meant to inform you of the County's response to recent letters from your consultant, the IT Group. On several occasions, most recently in their October 6, 2000 letter, the IT Group has summarized the past activities at this site and recommended "monitored natural attenuation" (MNA) as the appropriate remedial action for this site.

The County has discussed this site with Mr. Chuck Headlee of the Regional Water Quality Control Board (RWQCB) and at this time, we are not convinced that this is the most appropriate remedial approach for this site. As you may be aware, MNA is an acceptable EPA recommended approach, however, its use is recommended only when specific site conditions have been met. One requirement is that the burden of proof for justifying this approach is on the proposer of this remedial action. Therefore, our offices have notified your consultant that we would like to meet with him to discuss the merits of MNA. This meeting should be scheduled during the second week of November, if possible. Please contact your consultant to schedule a time and date acceptable to all attendees.

Some items, which should be provided or demonstrated at the meeting, are the following:

- Demonstration of declining contaminant concentrations
- Demonstration of source removal, estimation of residual soil and groundwater contamination at site
- Demonstration that remedial objectives will be reached within a reasonable time frame
- Verification that clean-up levels have been met and are protective of human health and the environment
- Demonstrate that MNA is occurring and provide a measure of its effectiveness
- Contingency plan and indicator of unacceptable performance of MNA

For further information you may contact the Center for Public Environmental Oversight at (415) 904-7751 or the EPA website @ <http://www.epa.gov/swerust1/directiv/index.htm>.

Mr. Richard Croop
October 26, 2000
StID # 1138
2901 Glascock Ave., Oakland
Page 2

Please contact me at (510) 567-6765 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Barney M. Chan". The signature is written in a cursive style with a long, sweeping underline.

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. Lehane, IT Corporation, 1921 Ringwood Ave., San Jose, CA 95131-1721

Mr. C. Headlee, RWQCB

MNA2901Glascock

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 8-28-2000

RO 2842

RO#437

August 25, 2000

StID # 1138

Mr. Richard Croop
E. B. Field Company
436 14th St., Room 805
Oakland CA 94612-1394

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

Re: 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Croop:

Our office has received and reviewed the July 12, 2000 correspondence from the IT Group regarding their opinion on the above site. IT proposes that current action at this site be limited to groundwater monitoring only. I have discussed this site with Mr. Chuck Headlee of the San Francisco Regional Water Quality Control Board (SFRWQCB) and our offices do not concur with your consultant's proposal. Because this site is located directly adjacent to the Oakland-Alameda estuary, groundwater contamination from this site is impacting this surface water. A fairly good estimation of the concentration of this petroleum is that which has been reported in monitoring well MW-6, which lies only a few feet from the estuary.

It is also apparent from both soil and groundwater analysis that the areas of the former underground tanks have considerable residual diesel contamination. These areas continue to be a source of diesel fuel that will eventually migrate to the estuary. Because of this, you are requested to propose some type of active remediation to prevent continual discharge to the estuary. Our office recommends that you consider several options, which may include any one or a combination of the following or others:

- Addition of oxygen releasing compound to a larger area.
- Addition of chemical oxidation compounds.
- Limited hot spot excavation
- Interception trench or barrier.

Our office also recommends that you contact and apply to the State Water Resources Control Board Underground Storage Tank Cleanup Fund (Cleanup Fund) for potential reimbursement of your remediation expenses. You may obtain an application by calling (916) 227-4307 or through the help of your consultant. **Please continue your quarterly monitoring and provide a remediation work plan within 45 days or no later than October 10, 2000.** You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. E. Garner, IT Corporation, 1921 Ringwood Ave., San Jose, CA 95131
Mr. C. Headlee, RWQCB

remed2901Glascock

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 6/5/2000
incl cd's
RO 2842
RO 437

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

June 2, 2000
StID # 1138

Mr. Richard Croop
E. B. Field Company
436 14th St., Room 805
Oakland CA 94612-1394

Re: 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Croop:

I have received and reviewed the May 11, 2000 Quarterly Report for the first quarter year 2000 for the above site as prepared by the IT Group. This monitoring event occurred on March 3, 2000, before our April 19th meeting at the County offices.

As you may recall from this meeting, the soil and groundwater diesel concentrations were in excess of that recommended by the Water Board's order #99-045 ie 518 ppm in soil and 640 ppm in groundwater. The results of the March 3rd monitoring continue to show elevated diesel in wells, including well MW-6, which is only a few feet from the Oakland-Alameda estuary. It is likely that the residual soil contamination from the releases from the former fuel tanks continues to act as a source of the diesel found in groundwater. The monitoring well data sheets indicate sheen on the water in several of the wells in addition to petroleum odors.

The options mentioned in my April 19th letter were to add oxygen releasing compounds or chemical oxidants such as hydrogen peroxide. Obviously, soil excavation, though effective, was not considered a "reasonable" alternative. The May 11th monitoring report recommended the replacement of oxygen-releasing socks into wells MW1, 2 and 6. Though this may be helpful, it would not treat the majority of the petroleum release. The socks have a limited affect in the groundwater in a limited radius around the well in which it is added. This would have only a gradual effect on treating the contamination. Please consider a larger area and amount of chemical treatment for this site. I would remind you that the initial amount of oxygen releasing compound added was calculated to prevent the migration of a petroleum plume not to treat the entire mass of the plume.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. E. Garner, IT Corporation, 1921 Ringwood Ave., San Jose CA 95131
2-2901Glascock

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 4-20-2000
/mld cas

20437

April 19, 2000
StID # 1138

Mr. Richard Croop
E. B. Field Company
436 14th St. Room 805
Oakland CA 94612-1394

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

Re: 2901 Glascock Ave., Oakland CA94601

Dear Mr. Croop:

This letter serves to recount our meeting today at the County's office. Mr. Erin Garner, your consultant from IT Corporation was also present. We discussed the current status, clean-up goals and remediation options. The following observations summarize our meeting:

- The presence of methyl tertiary butyl ether (MTBE) in groundwater at this site was agreed to have originated from off-site. The current concentrations in groundwater are not a human health or ecological health concern.
- Our office is using the recommendations of the Water Board's Order No. 99-045 (SFIA Order), as guidance for soil and groundwater clean-up goals since the setting of this site is somewhat similar to the San Francisco Airport. This Order recommends the ecological clean-up levels of a maximum soil concentration of 518 parts per million (ppm) and the maximum groundwater concentration of 640 ppm. The Water Board would like to see groundwater concentrations consistently below this clean-up prior to closing this site. Four quarters of consistent concentrations would be considered a trend.
- Because the groundwater concentrations have exceeded this clean-up level, your options are either continued groundwater monitoring or monitoring with active remediation. Active remediation options include the addition of oxygen releasing material or the addition of chemical oxidants such as hydrogen peroxide. The addition of these chemicals would likely shorten the required time for monitoring. Should you decide to continue monitoring, you can verify that natural bio-remediation is occurring by measuring groundwater parameters such as dissolved oxygen, oxidation-reduction potential, nitrates, sulfates and ferrous iron.

Please inform our office of your choice of remediation options. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. E. Garner, IT Corporation, 1921 Ringwood Ave., San Jose, CA 95131

2901Glascockstatus

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Sent 12/9/99
Including cc's

20437

December 8, 1999
StID # 1138

Mr. Dennis Buran
Glascock Street Properties
383 Diablo Road, Suite 100
Danville, CA 94526

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700
(510) 337-9432

Re: Former Dorr-Oliver Site, 2901 Glascock St., Oakland CA 94601

Dear Mr. Buran:

Our office has received and reviewed the December 1, 1999 Third Quarter 1999 groundwater monitoring report for the above site as prepared by the IT Group (IT). This is the first monitoring event after the injection of the oxygen releasing compound (ORC) injections, performed in August of this year, and there appears to a significant decrease in the total petroleum hydrocarbons (diesel and gasoline) concentrations in groundwater. In addition, the report states that ORC socks were placed into wells MW-1, MW-2 and MW-6 the same day as the monitoring occurred. You are reminded to take dissolved oxygen readings in all wells to support the assumption that the increased dissolved oxygen is resulting in enhanced bio-remediation of TPH in groundwater. In addition, please be sure to remove the ORC socks and purge the monitoring well prior to sampling.

You may have your consultant contact me to schedule the requested meeting with our office. Should you request site closure, please provide your site-specific recommendation for the cleanup level for TPH as motor oil as recommended by the Water Board.

Please contact me at (510) 567-6765 with any comments or questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Ms. D. Sarmiento, The IT Group, 1921 Ringwood Ave., San Jose, CA 95131-1721
Mon2901Glascock

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



*Lead RWQCB
R0437*

ENVIRONMENTAL HEALTH SERVICES

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

July 23, 1999
StID #1138

Mr. Dennis Buran
Glascock St. Properties
425 Market St.
Oakland CA 94607

**Re: Request for the Installation of Oxygen Releasing Compound Injections at 2901
Glascock Ave., Oakland CA 94601**

Dear Mr. Buran:

This letter requests that you implement **within the next 30 days, or no later than August 26, 1999**, the approved work plan for the injection of oxygen releasing compound (ORC). There was some debate as to the appropriate amount of ORC to be added to each boring. Our office and your consultant each had their own rationale for their estimate. However, to expedite this work, please proceed with the work plan as described in Pacific Environmental Group's January 25, 1999 report. Certainly, if the dissolved diesel concentration does not fall to acceptable levels, you may need to re-inject additional ORC.

Please contact our office 72 working hours prior to this work. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files

Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose, CA 95110-1006
ORCimp2901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0#437

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

March 30, 1999
StID # 1138

Mr. Dennis Buran
Glascock Street Properties
425 Market St.
Oakland CA 94607

**Re: Work Plan for the Addition of Oxygen Releasing Compound at 2901 Glascock Ave.,
Oakland CA 94601**

Dear Mr. Buran:

Our office has received the March 23, 1999 Pacific Environmental Group (PEG) reply to my request for clarification as to the amount of oxygen releasing compound (ORC) necessary to treat the diesel contamination at the above site. I have also spoken with Regensis, the supplier of ORC, to get their technical opinion. The difference in the amount of ORC estimated by our office and that by PEG is due partially to a different estimation of the size of the release and to a larger part to the approach used to determine the amount of ORC necessary. The County's estimate was based upon the amount of ORC required to treat the entire contaminant plume while PEG's estimate is based upon the amount of ORC needed to form a barrier to prevent migration to the estuary. Their estimation assumes a smaller plume and less contribution by the absorbed petroleum from the soil. As mentioned by PEG, using the ORC slurry barrier method, there still may be residual contamination left at the site, hopefully, below any action limits.

You may initiate the work plan as soon as possible. Please contact me at (510) 567-6765 prior to this work.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose, CA 95110-1006

ORCap2901

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

Ro# 437

February 25, 1999
StID # 1138

Mr. Dennis Buran
Glascock Street Properties
425 Market St.
Oakland CA 94607

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

Re: Work Plan for Additional Remediation at Former Dorr-Oliver Site, 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Buran:

Our office has received and reviewed the January 25, 1999 Pacific Environmental Group, Inc. (PEG) Work Plan for remediation at the above referenced site. The work plan proposes the installation of borings in three distinct areas on the site and the injection of oxygen releasing compound (ORC). The borings will be advanced to a depth of 20 feet and backfilled from the bottom of the boring to a depth of 10'. The remainder of the boring would be grouted with cement. A total of 15 borings with 16 pounds of ORC per boring is proposed.

I have used the reported Third Quarter 1998 concentrations of diesel in groundwater at this site to estimate the approximate amount of ORC needed to treat the petroleum plume. Using the following conservative assumptions:

- Approximate plume size is 80'x240'x10'
- Average diesel concentration is 2.8 mg/l
- The recommended additional demand factor (8), Oxygen:Hydrocarbon ratio (3) and assumed ORC concentration of 10% oxygen

The estimated amount of ORC needed to treat this amount of hydrocarbon is 2800# as opposed to the proposed 15x16= 240#. Therefore, it appears that the proposed amount of ORC is about 1/10 the amount necessary.

Although our office approves of the concept of adding ORC into the saturated soils to treat the diesel contamination, we would like you to explain why the proposed amount of ORC is appropriate. Please have your consultant respond to this inquiry prior to scheduling this work..

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose, CA 95110-1006

ORCwp2901



January 8, 1999
StID # 1138

Mr. Dennis Buran
Glascock Street Properties
425 Market St.
Oakland CA 94607

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

**Re: Third Quarter 1998-Quarterly Report for Former Dorr-Oliver Site, 2901 Glascock Ave.,
Oakland CA 94601**

Dear Mr. Buran:

Our office has received and reviewed the November 23, 1998 Third Quarter 1998 report for the above site as prepared by Pacific Environmental Group (PEG), your consultant. In this report, a number of variations were used to analyze the petroleum hydrocarbon in the groundwater samples. Groundwater samples were analyzed after treating with silica gel and another analyzed after filtering through a 0.7 micron filter and treatment with silica gel. These procedures may be more representative of the groundwater by removing sediment and polar non-petroleum materials. Further, the laboratory characterized the hydrocarbon as resembling the fresh product, the weathered product or as unidentifiable material in a particular carbon range.

Because the laboratory could not identify the hydrocarbon as either diesel, motor oil or weathered diesel or motor oil, your consultant concludes that these products do not exist and no further action is required. Our office, with concurrence with the Water Board, does not agree with this conclusion. We agree that the treatment methods are valid and may yield a truer value for the petroleum concentration. However, the material which is identified in a particular carbon range still represents material which may have equal or higher risk than the fresh or weathered product. Most certainly, this material came from the original material. Because an extensive study has not been done to determine the toxicity of the fresh product, weathered product or product within the diesel range, all material is considered equally toxic.

As a starting point, the recommended clean-up levels in the San Francisco Airport Order 95-136 were considered. TPH as diesel clean-up levels for soil and groundwater were recommended for the zone within 300 feet of the water. These levels under consideration are 0.314 mg/l for groundwater and 267 ppm for soil. These clean-up levels continue to be exceeded at this site.

The characterization of the petroleum does not alter the data which still indicates residual fuel in the saturated soils near the former tanks. Because of this, you are required to complete the previously requested items in my September 29, 1998 letter. Further, the work plan when approved, should be implemented as soon as possible.

Please submit your work plan including the requested information to our office **within 30 days or by February 10, 1999.**

Mr. R. Croop
StID # 1138
2901 Glascock Ave., Oakland 94601
January 8, 1999
Page 2.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose, CA 95110

Mr. C. Headlee, RWQCB, 1515 Clay St., Suite 1400, Oakland CA 94612

2ORCwp-2901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#437

September 29, 1998

StID # 1138

Mr. R.C. Croop
E.B. Field Company
426 Fourteenth St., Suite 305
Oakland CA 94612

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

Re: Work Plan for 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Croop:

Our office has received and reviewed the September 11, 1998 Quarterly Report for groundwater monitoring at the above referenced site as prepared by Pacific Environmental Group, Inc., (PEG). This report also responded to my prior August 18, 1998 letter, wherein I requested a work plan for the remediation of the petroleum plume at this site.

Based on the results of this monitoring event, dissolved diesel (aged diesel) and motor oil still exists at the site in areas near the former underground tanks and near the boundary of the site and the Oakland-Alameda estuary.

This report proposes to perform the same work previously proposed in PRG's November 12, 1997 work plan. This is the installation of the five remediation wells just up-gradient of monitoring well MW-6 and the estuary. I must reiterate, this work plan alone is **not acceptable** to our office and that of the Water Board. As stated in my August letter, additional oxygen releasing compound (ORC) must also be applied to the source areas at the site ie near or down-gradient of the former underground storage tanks. In addition, our offices feel it is of value to determine the mass of petroleum hydrocarbon at the site even though your consultant feels that there is inherent error in making this estimation. I believe that a conservative estimate can be made for the amount of petroleum mass and the amount of ORC added accordingly.

Your work plan should include the following:

- an estimation of the amount of ORC needed to treat the petroleum mass
- a justification for the location of the wells and borings
- the construction specifications for the wells and borings and
- a method for evaluating the effectiveness of the ORC application.


Your consultant also implies that because there are no concrete cleanup levels recommended for this site the previously suggested values may be too conservative. This may be the case, however, the current petroleum concentration in groundwater exceeds even the most liberal concentrations anticipated as future cleanup goals. We would also argue that the qualitative objectives **have not been met**. The hydrocarbon plume is not stabilized or shrinking, considerable dissolved source remains on-site and the ecological risk may exist to the estuary population.

Please provide a complete work plan for the introduction of ORC to groundwater at this site **within 30 days or by October 30, 1998**

Mr. R. Croop
StID # 1138
2901 Glascock Ave.
September 29, 1998
Page 2.

Please contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose, CA 95110
Mr. C. Headlee, RWQCB, 1515 Clay St., Suite 1400, Oakland CA 94612

ORCwp-2901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Ro# 437

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

August 18, 1998
StID # 1138

Mr. R. C. Croop
E.B. Field Company
436 Fourteenth St., Suite 305
Oakland CA 94612

**Re: Request for Work Plan for Groundwater Treatment at 2901 Glascock Ave., Oakland
CA 94601**

Dear Mr. Croop:

In my July 9, 1998 letter to you, I requested a work plan to remediate the petroleum hydrocarbon, consisting of mainly diesel and motor oil, in the groundwater at the above site. This followed our May 14, 1998 meeting at the Water Board with Mr. Chuck Headlee. At that time, Mr. Headlee clearly stated that the current levels of dissolved diesel at this site were not acceptable to be discharged into the estuary. A generalized cleanup level of 570 parts per billion (ppb) was provided as an initial goal based on an average of data from various locations in the Bay Area. Lower values, have also been proposed as low as 100 ppb. Our office acknowledges that it is not practical to perform any more soil excavation, therefore, groundwater treatment will be required.

I spoke with you on August 7, 1998 and you stated that you had decided to perform enhanced bioremediation using oxygen releasing compound injection. My letter requested that you submit your work plan by August 10, 1998. To date, our office has not received your work plan.

In addition, please be advised, that the November 12, 1997 Pacific Environmental Group (PEG) work plan by itself is not acceptable. That work plan proposed to install five remediation wells (RW-1 through RW-5) immediately up-gradient to MW-6 and each well would be equipped with an ORC device. Though this might form "curtain" of oxygen enriched groundwater, it would not treat the source of the release which lies considerably up-gradient of MW-6 near the former underground tanks.

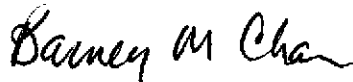
In your work plan, please have your consultant provide a justification for the number and location of borings needed to introduce the oxygen releasing compound (ORC). This can be done by estimating the amount of residual petroleum at the site and calculating the amount of oxygen needed to react with this amount of hydrocarbon. It is anticipated that a grid of borings for slurry ORC injection will be necessary to achieve this effect.

**Please submit your work plan and a schedule for its implementation within 30 days or by
September 21, 1998.**

Mr. R. Croop
StID # 1138
2901 Glascock Ave.
August 18, 1998
Page 2.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. A. Lehane, Pacific Environmental Group, 2025 Gateway Place, Suite 440, San Jose,
CA, 95110

Mr. C. Headlee, RWQCB

2wp2901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 437

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

July 9, 1998
StID # 1138

Mr. R.C. Croop
E.B. Field Company
436 Fourteenth St., Suite 305
Oakland CA 94612

Re: 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Croop:

This letter responds to your July 7, 1998 letter requesting an update on the status of the above site in regards to achieving site closure. First of all, please be aware that letter which you sent to our office from Ms. Madhulla Logan granting closure dealt with the removal of metal shavings and slag material from the shoreline of the site. That was a completely separate issue from the on-going petroleum release from the former underground diesel tanks.

In regards to the meeting we had at the Water Board on May 14, 1998, it was concluded that the diesel contamination currently found in groundwater at this site exceeds acceptable levels which would be protective of the ecological species in the estuary. Mr. Chuck Headlee of the Regional Water Quality Control Board (RWQCB) provided a draft table of acute toxicity concentrations for a selective number of petroleum hydrocarbons relative to their effects on development and survival of specific aquatic species. This was meant to act as guidance for determining acceptable residual groundwater concentrations at ecological risk sites. Mr. Headlee further stated that chronic ie long term exposure, concentrations of petroleum hydrocarbons should be 1/10 the value of the acute concentrations. Because many acute values are given in this draft, I averaged the 12 values given for diesel and diesel/fuel oil. The resultant concentration is approximately 5700 ug/l (parts per billion). The acceptable chronic concentration would therefore be 5700/10 or 570 ppb diesel. The RWQCB is also considering Tier 1 Standards for LUFT Sites Adjacent to Surface Waters. In this draft, both saltwater and freshwater ecological maximum soil and groundwater concentrations are proposed. The corresponding saltwater diesel maximum groundwater sample is 100 ppb.

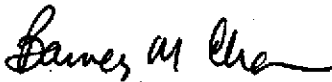
The groundwater sampling results for the March 27, 1998 event indicate that the concentration of diesel in monitoring well MW-6 has declined to 1500 ppb, while the concentrations in monitoring wells MW-1 and MW-2 have increased to 4600 ppb and 15,000 ppb, respectively. This indicates that the dissolved diesel contamination source remains onsite and continues to pose a threat to the estuary. Prior to recommending site closure, it must be demonstrated that the groundwater plume is shrinking or stabilized. The contamination source should be removed or remediated. In addition, no risk to human health or the environment should exist (ie the cleanup levels must be met). At this time, our office requests a work plan to achieve the requirements mentioned above.

Mr. Croop
StID # 1138
2901 Glascock Ave.
July 9, 1998
Page 2.

Please provide your work plan within 30 days or by August 10, 1998. Please also provide a copy of the complete monitoring report performed on March 27, 1998. I would appreciate if you provide a copy of this letter to all other interested property owners.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B.Chan, files

Mr. A. Lehane, Pacific Environmental Group, 2025 Gateway Place, Suite 440, San Jose,
CA 95110

Mr. C. Headlee, RWQCB .

Stat2901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



20437

November 21, 1997
StID # 1138

Mr. Dennis Buran
Glascock St. Properties
425 Market St.
Oakland CA 94607

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

**Re: Work Plan for Additional Remediation for 2901 Glascock St.,
Oakland CA 94601**

Dear Mr. Buran:

Our office has received and reviewed the November 12, 1997 Remediation Work Plan provided by Pacific Environmental Group, Inc., (PEG). This work plan responds to my prior letter requesting additional actions to remediate the high levels of Total Petroleum Hydrocarbons as diesel (TPHd) occurring at this site and being discharged into the Oakland-Alameda estuary.

This work plan proposes the installation of five (5) remediation wells, (RW), where oxygen releasing compound (ORC) will be added. This array of wells proposed should serve as a "curtain" to prevent the migration of petroleum contamination into the estuary. Our office approves of this work plan with the condition that if concentrations of TPHd do not attenuate and stabilize in monitoring wells MW-1 and MW-2, additional RWs may be necessary to treat the heart of the plume. Please schedule this work as soon as possible.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose
CA, 95110

RWs2901

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

✓ RO#437
RO#2842

October 10, 1997
StID # 1138

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

Mr. Dennis Buran
Glascock Street Properties
425 Market St.
Oakland CA 94607

Re: Quarterly Report-Second Quarter 1997, 2901 Glascock St.,
Oakland CA 94601

Dear Mr. Buran:

Our office has received and reviewed the August 19, 1997 Pacific Environmental Group (PEG) quarterly groundwater monitoring report for the above referenced site. I have also spoken with Mr. Andrew Lehane of PEG. He requested that I comment on the recommendations made in this report. Recall, PEG has used a number of sources and come up with a proposed cleanup standard of 6.5 ppm (mg/l) Total Petroleum Hydrocarbons as diesel (TPHD) for this site. Based upon the monitoring results, PEG recommended that no modification of the remediation plan be performed. That is, remediation would consist solely of the addition of Oxygen Releasing Compound (ORC) in wells MW-1, MW-2 and MW-6.

I spoke with Mr. John Kaiser of the SFRWQCB about this site. It was his opinion that current conditions at this site **were not acceptable**. Through our discussion the following observations were made:

* the immediate proximity of the Oakland-Alameda estuary to this site indicates that the petroleum release from this site is within the mixing zone of the estuary water and is therefore directly discharging into the surface water.

* as mentioned in the PEG report, the RWQCB does not consider dilution when setting discharge limits from the source, therefore, dilution factors cannot be considered.

* the referenced 10 mg/l water protection standard for oil and grease in the Basin Plan cannot be used TPHd. It is known that the ecotoxicity of TPHg, TPHd, TPHmo vary.

* though the RWQCB may be considering modifying the groundwater cleanup standards for the SF Airport, it has not been shown that the conditions and assumptions made for the Airport, which would allow this modification, also exist at this site.

Mr. Dennis Buran
StID # 1138
2901 Glascock Ave.
October 10, 1997
Page 2.

* the measured oxygen concentration in those wells where ORC was added is 3-4 ppm, considerably lower than saturated conditions. It appears that site could benefit by the addition of more ORC compound since the areal extent of the current ORC compound is not treating the entire extent of groundwater contamination.

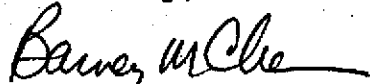
* besides TPHd, these analytes have been detected in MW-6, the most downgradient well; TPHg, benzene, MTBE, TPH as motor oil and chlorinated solvents. Are there cleanup levels necessary for any of these parameters?

* the "conservative" cleanup level of 3 mg/l TPHd from the Aquatic Toxicity of Petroleum Product (ATPP) and the proposed cleanup level of 6.5 mg/l has been exceeded regularly in MW-6.

Because of the above, our office requests that a further modification of your remedial plan be instituted. Please provide an appropriate work plan to our office within 30 days or by November 12, 1997.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files

Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose
CA, 95110

Mr. J. Kaiser, RWQCB

modwp2901

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

(RWQCB))

RO# 437

July 17, 1997
StID # 1138

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

Mr. Dennis Buran
Glascock St. Properties
425 Market St.
Oakland CA 94607

**Re: Subsurface Investigation at 2910 Glascock Ave., Oakland CA
94601**

Dear Mr. Buran:

Our office has received and reviewed the May 2, 1997 Pacific Environmental report which includes the first quarter 1997 Groundwater Monitoring report and the February 19, 1997 Remedial Soil Excavation Report. The results of the excavation report indicates that the contaminated shallow soils have been successfully removed. The results of the monitoring report indicate a continuing petroleum hydrocarbon plume beneath the southern portion of the site. Of continuing concern is the elevated Total Petroleum Hydrocarbons as diesel (TPHd) and Total Petroleum Hydrocarbons as motor oil (TPHmo) which is likely migrating offsite into the Oakland Estuary.

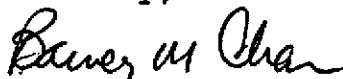
The quarterly report states that oxygen-releasing compound (ORC) will be introduced into monitoring wells MW-1, MW-2 and MW-6 during the second quarter 1997 and dissolve oxygen measured before and after introduction. Our office requests that an additional grid of casings be introduced in the southern section of the site to serve as a curtain to reduce or prevent the continual discharge of TPH into the Oakland Estuary. You can get a proposal for performing this from your consultant or the provider of the ORC. When this curtain is installed, you should remove all ORC from monitoring well MW-6 which will then serve as an indicator well to verify intrinsic bioremediation. Please provide a work plan for this or another remediation method (ie bioslurping et al) within 30 days or by August 18, 1997. You are also encouraged to provide suggested cleanup levels for TPH protective of estuarine life.

It was noted that you failed to run the metals cadmium, chromium, lead, nickel and zinc and halogenated volatile organics on well MW-6 and MW-8 as requested in my September 30, 1997 letter. Please add these parameters on your future monitoring.

Mr. Dennis Buran
StID # 1138
2901 Glascock Ave.
July 17, 1997
Page 2.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: Mr. A. Lehane, Pacific Environmental Group, 2025 Gateway
Place, Suite 440, San Jose, CA 95110

B. Chan, files

wprq2901

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director
September 30, 1996
StID # 1138

20437

Mr. Dennis Buran
Glascock St. Properties
425 Market St.
Oakland CA 94607

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

Re: Remedial Activities at 2901 Glascock Ave., Oakland CA 94601

Dear Mr. Buran:

This letter serves to comment on the suggestions made in Pacific Environmental Group's (PEG) September 10, 1996 quarterly monitoring report along with specifying conditions for the previously proposed Remedial Action Recommendation in PEG's February 29, 1996 report.

Based on recent groundwater sampling data which shows reduced concentration of diesel contamination in monitoring wells, PEG no longer recommends bioslurping from the wells. PEG recommends the installation of oxygen releasing compound (ORC) units in MW-1, MW-2, MW-3, MW-5 and MW-6. At this time, our office agrees with this approach, however, should the trend of decreasing diesel concentration not continue, bioslurping and/or additional ORC well points should be considered.

Please discuss the merits of groundwater sampling from the wells in which ORC units are implaced. Our office questions the validity of groundwater sampling from wells "within" the treatment area. Does groundwater sampling really reflect the concentration of the plume or just an area of increased biodegradation?

I understand that the limited excavation of hydrocarbon and PCB affected soils in currently being scheduled. In order to determine the effectiveness of this excavation, please take confirmatory soil samples from sidewalls and floor of the excavation. TPH as diesel and TPH as motor oil should be run on the samples from the hydrocarbon contaminated area and EPA Method 8080 should be run on the confirmatory samples from the PCB affected area. Compositing sampling may be done, however, please be aware of the limitation that this type result gives. Field screening as well as visual observation is recommended when determining the extent of excavation.

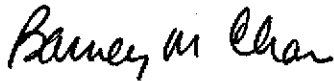
You are reminded to continue to analyze all wells for TPHd,g,mo and BTEX on a quarterly basis and on an annual basis please analyze wells MW-6 and MW-8 additionally for the metals: cadmium, chromium, lead, nickel and zinc and chlorinated hydrocarbons.

Mr. Dennis Buran
StID # 1138
2901 Glascock Ave.
September 30, 1996
Page 2.

Please notify me prior to your field work so I may arrange to be present if possible to witness confirmatory sampling.

I may be reached at (510) 567-6765 if you have any comments or questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: Mr. A. Lehane, PEG, 2025 Gateway Place, Suite 440, San Jose,
CA 95110

B. Chan, files

RA2901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 437

RAFAT A. SHAHID, DIRECTOR

March 22, 1996
StID # 1138

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510)567-6700

Mr. Dennis Buran
Glascock St. Properties
436 14th St., Room 305
Oakland CA 94612

**Re: Site Assessment and Remedial Action Recommendations for
2901 Glascock Ave., Oakland CA 94601**

Dear Mr. Buran:

Our office has received and reviewed the February 29, 1996 **Site Assessment and Remedial Action Recommendations** report prepared by Pacific Environmental Group, Inc (PEG). This report details additional subsurface investigation to delineate soil and groundwater contamination previously identified at this site. These areas were where PCBs, metals and Total Petroleum Hydrocarbons as gas, diesel and motor oil were found. The presence of chlorinated solvents was also tested for in the groundwater. An additional monitoring well, MW-8, was installed to delineate the lateral extent of the petroleum groundwater plume. After the installation of MW-8, all eight wells were sampled.

Based on the findings in this report, PEG has made a number of remedial recommendations. I have discussed these with Ms. Susan Willhite of PEG we have reached agreement on the following items:

Soils:

* **Excavation of surface soils with TPHd concentration exceeding 1000 ppm to a depth of 3-5 feet.** This is acceptable given the relative limited areal extent of this contamination and the expected remedial affect it will have on the diesel concentration in the shallow groundwater.

* **Excavation of soils of the upper 18" from the southwest corner of the building were metal shavings and total metals in soils have been detected.** Since groundwater in this area has apparently not been affected by metals, this excavation is not required by our office. It may be done, however, at your discretion.

* **Excavation of soils to a depth of 18" in the area of the ramp outside the western portion of the building.** Hazardous waste levels of PCBs have been detected in this area where transformers were reportedly stored. The PCB contamination is expected to have affected only the surface soils, therefore, this excavation is warranted and acceptable.

Mr. Dennis Buran
StID # 1138
2901 Glascock Ave.
March 22, 1996
Page 2.

Groundwater:

* The high levels of diesel on the southwest side of the building is likely impacting the waters of the Alameda-Oakland estuary. Monthly bioslurping using the existing wells is proposed to treat the free product and enhance bioremediation. After this, oxygen releasing compounds will be introduced into the wells. This approach is acceptable as long as quarterly monitoring indicates that this is successful in reducing the petroleum contamination in groundwater. Please run TPHd,g,mo and BTEX on a quarterly basis on all wells. In addition, on an annual basis PCBs, the metals; cadmium, chromium, lead, nickel and zinc and chlorinated hydrocarbons (Method 8010) should be run on wells, MW-6 and MW-8.

A specific clean-up goal for TPH in groundwater was not agreed upon, however, the proposed PEG value of 10 mg/l is not acceptable. Our office and the Regional Water Quality Control Board is willing to evaluate a site specific cleanup goal if proposed by your consultant.

Please contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: Ms. S. Willhite, PEG, 2025 Gateway Place, Suite 440, San Jose,
CA 95110
G. Coleman, files

Rec2901

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0437

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

April 25, 1995
StID # 1138

Mr. Dennis Buran
Glascock Street Property Owners
c/o Buran Equipment Co.
P.O. Box 1833
San Leandro CA 94577

**Re: Comment on April 17, 1995 Proposal for Monitoring Well
Locations at 2901 Glascock St., Oakland CA 94601**

Dear Mr. Buran:

This letter serves to comment on the above referenced work plan proposal and to request additional actions based on the results presented in this report. Recall, your contractor, W. A. Craig was not able to complete their work plan addendum which called for the installation of nine additional soil borings to further assess the lateral migration of petroleum contamination. In addition, based on what was encountered at the site, three monitoring wells are proposed in the April 17, 1995 work plan. These well locations are acceptable on the condition that at least one well be used to extract free product and control its migration. I understand that these wells are scheduled for installation on April 27, 1995.

Because free floating product was encountered in soil borings SB-1 through SB-4 and SB-8 and SB-9 you are required to remove the free product in a manner which minimizes the spread of contamination into previously uncontaminated zones per Section 2655(b) of Title 23 of the California Underground Storage Tank Regulations. In addition, Section 2725(d) also requires the submittal of a Corrective Action Plan (CAP) which: assesses the impact of the release of chemicals in question, which evaluates the alternatives for remedying or mitigating the release and proposes applicable cleanup level for the contaminants.

Please indicate your actions to address the free product encountered at this site in a proposal to be submitted to our office **within 30 days or by May 26, 1995**. In addition, your Corrective Action Plan should be submitted **within 45 days of this work plan or by July 14, 1995**. Prior to this, you may want to meet with our office to discuss your remedial approach and your proposed cleanup levels.

Mr. Dennis Buran
StID # 1138
2901 Glascock St.
April 25, 1995
Page 2.

It may be of interest to you that this site's location will make it difficult to apply the Non-Attainment Policy, although our office will entertain a risk assessment as part of your Corrective Action Plan.

Please notify our office if your schedule for monitoring well installation changes.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: Mr. J. Dailey, W. A. Craig Inc., P.O. Box 448, Napa CA 94669-
0448

B. Reynolds, files
CAP2901

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



✓RO# 437 (LOP)

RO# 2842 (SUC)

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

February 21, 1995
StID # 1138

Mr. Richard Croop
E. B. Field Company
436 14th St., Suite 305
Oakland CA 94612

DEPARTMENT OF ENVIRONMENTAL HEALTH
ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIV.
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

**Re: Comment on Progress Report and Work Plan for Additional
Investigation at 2901 Glascock Ave., Oakland CA 94601**

Dear Mr. Croop:

Thank you for the submission of the above referenced report. It was hand delivered to me by Mr. Craig on February 16, 1995. I have completed my review of the report and it is acceptable. Please keep the following items in mind while you proceed with your next soil/groundwater investigation:

1. Please proceed with the soil borings and groundwater sampling **within the next 45 days**. This will allow you to provide a report of your findings within the next quarterly monitoring event ie by May 21, 1995. Please contact me at least **48 hours** prior to your field work so I may arrange to witness your activities if possible.
2. Based on the observations and analytical results of groundwater samples, a groundwater remediation system will be required for this site. In addition, should free product be present, you are required to make every effort to remove such product and take actions to prevent its migration to previously uncontaminated areas.
3. Your next technical report should also provide a timetable for the submittal of your Final Remediation Plan (FRP) as mentioned in this report.

You should contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: Mr. J. Dailey, 141 H. St., Suite A, Petaluma, CA 94952
Mr. W. A. Craig, P.O. Box 448, Napa, CA 94559-0448
E. Howell, files
2wpap2901

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0437

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

January 18, 1995
StID # 1138

Mr. Richard Croop
E.B. Field Company
436 14th St., Suite 305
Oakland CA 94612

ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIV.
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

**Re: Extension for Submittal of Work Plan for Additional Site
Investigation at 2901 Glascock Ave., Oakland CA 94601**

Dear Mr. Croop:

Our office has received the January 3, 1995 request from Mr. W. A. Craig requesting an extension for the submittal of a specific work plan for the further definition of soil and groundwater contamination at the above site. He anticipated the submittal could be made by February 21, 1995. This extension is approved by our office.

Please be reminded that quarterly groundwater monitoring should continue at this site until further notice from our office or that of the RWQCB (Regional Water Quality Control Board). Your next monitoring event should have occurred either late Decemeber 1994 or early January 1995. In accordance with my December 8, 1994 letter, your quarterly groundwater monitoring report should also be submitted to our office no later than the same date mentioned above ie **February 21, 1995**. Please insure that this report includes a table of all previous groundwater analytical data, groundwater elevation data, a groundwater gradient map and details of all measures used to remove free product from the wells.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Barney M. Chan".

Barney M. Chan
Hazardous Materials Specialist

cc: Mr. J. Dailey, 141 H St., Suite A, Petaluma, CA 94952
Mr. W. A. Craig, P.O. Box 448, Napa, CA 94559-0448
E. Howell, files
ext-2901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY



RO2842 (SLIC)

✓ R0437 (LOP)

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, DIRECTOR

~~December 8, 1994~~

StID # 1138

DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Parkway

Alameda, CA 94502-6577

(510) 729-6777

Mr. Richard Croop
E.B. Field Company
436 14th St., Suite 305
Oakland CA 94612

**Re: Comment on December 2, 1994 Report, Soil and Ground Water
Investigation at 2901 Glascock Ave, Oakland CA 94601**

Dear Mr. Croop:

Our office has just received and reviewed the above referenced report as provided by your consultant, W. A. Craig, Inc. The field work was overseen by both Mr. Craig and Mr. John Dailey. As you are aware, four shallow groundwater monitoring wells were installed late September 1994 and water samples were taken in early October. The results of both soil and groundwater samples indicate contamination of both kind, the limits of which are yet undefined. Free floating product was observed in both monitoring wells MW-1 and MW-2. In this report, your consultant recommends the advancement of an additional 8-14 borings and the conversion of 2 or 3 of these borings into monitoring wells. Both soil and groundwater samples would be taken. The extent of petroleum contamination is assumed to be determinable through this work. In general, this approach is acceptable. Our office requests a work plan detailing the **specifics** of this work.

Please provide your work plan to our office **within 30 days or by January 13, 1995.**

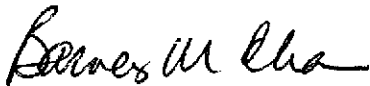
In addition our office requires the following items:

1. Please be aware should free product continue to be found in any of the wells at this site, you are required per Section 2655 of Title 23, Chapter 16 of the California Underground Storage Tank Regulations ie free product must be removed in a maner that minimizes the spread of contamination into previously uncontaminated zones...
2. Please note that in the text of this report, monitoring well MW-3 is reported to have detected 320 ppm diesel. The actual amount according to the analytical report is 320 ppb, a concentration of much less significance than 320 ppm.
3. From this point on, groundwater monitoring of all existing wells must be performed on a quarterly basis. Your next sampling event should occur in January 1995 and reports are due **within 45 days of the sampling event.** In your subsequent monitoring reports please include a groundwate gradient map.

Mr. Richard Croop
StID # 1138
2901 Glascock Ave.
December 8, 1994
Page 2.

I assume you are still the contact person for the Glascock Partners even though the cover letter of this report is addressed to Mr. Dennis Buran. Please contact at (510) 567-6765 with any questions, comments or corrections.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: Mr. J. Dailey, 141 H St., Suite A, Petaluma, CA 94952
Mr. W. A. Craig, P.O. Box 448, Napa, CA 94559-0448
E. Howell, files

2wp-2901

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R02842(9UC)

✓ R0437 (LOP)

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

August 25, 1994
StID # 1138

Mr. Richard Croop
E. B. Field Company
436 14th St., Suite 305
Oakland CA 94612

**Re: Comment on August 5, 1994 Work Plan for the Installation of
Monitoring Wells at 2901 Glascock Ave., Oakland CA 94601**

Dear Mr. Croop:

Thank you for the submission of above referenced work plan as prepared by Mr. John Dailey. I have completed my review and exchanged comments with Mr. Dailey regarding the work plan's contents. One concern I expressed was that soil samples taken after over-excavation were only field screened, therefore, actual concentrations of residual contamination are not known. Mr. Dailey stated that additional borings would be taken later to determine the residual contamination. This is acceptable, however, wouldn't it be more cost effective to avoid a second mobilization? Be advised, our office will need to be present to witness these additional borings.

The work plan calls for the installation of four monitoring wells at this site; one each in the assumed downgradient direction relative to the former tanks and one each in the upgradient and downgradient direction of both tanks. You may proceed with this work plan with the following condition:

1. Please analyze all soil samples from the soil/water interface by a certified lab for TPH as diesel, BTEX and TPH as motor oil. All other soil samples should be field screened by an OVA instrument at a minimum.
2. As mentioned in the plan, please contact me at (510) 567-6700 at least 48 hours in advance of any field work.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: Mr. J. Dailey, 141 H St., Suite A, Petaluma, CA 94952
Mr. W. A. Craig, P. O. Box 448, Napa, CA 94559-0448
E. Howell, files

wpap2901

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RO437 (LOP)

RO2842 (SLIC)

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

March 31, 1994
StID # 1138

Mr. Richard Croop
E. B. Field Company
436 14th St., Suite 305
Oakland CA 94612

**Re: Request for Work Plan for Groundwater Investigation
at 2901 Glascock Ave., Oakland CA 94601**

Dear Mr. Croop:

As you are aware, the above site has been transferred to the Local Oversight Program (LOP) section of the County's Hazardous Materials Division. Mr. Britt Johnson, your former contact, will no longer be handling this site. Your new contact is the undersigned Hazardous Materials Specialist. A Notice of Requirement to Reimbursement sent to your attention, was meant to inform of this action.

Our office has reviewed the January 21, 1994 Tank Closure Report prepared by Mr. Don James of Pacific Rim Environmental. This document details the removal of two underground storage tanks from the above site. It also gives the results of a number of soil and groundwater samples taken after the February 23 and February 26, 1993 tank removals. As high as 1400 ppm diesel and 3800 ppm diesel were detected in soil samples from the 4000 and 20,000 gallon fuel tanks respectively. Grab water samples from the 20,000 gallon excavation pit detected 16 mg/l diesel and 26 mg/l oil and grease. Overexcavation was performed on both tank pits, however, this report states that they were unable to obtain non-detectable concentrations of hydrocarbons in both tank pits. It appears that field screening rather than laboratory analysis was used to evaluate the soil samples taken after overexcavation. This is unfortunate. Though soil excavation had been performed to all extent possible, it is necessary to determine what levels of contamination are left in place.

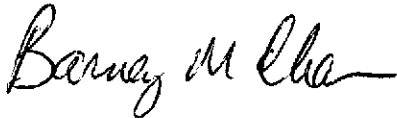
These results indicate that this site has experienced an unauthorized release of petroleum hydrocarbons, the extent of which must be determined and potentially remediated. You are requested to submit a work plan for site characterization and groundwater investigation. Enclosed, please find Appendix A, a guidance document from the Regional Water Quality Control Board, RWQCB, which gives the elements of a typical work plan. Also enclosed is a blank Unauthorized Release Form (URF) to be completed by you or your designee and returned to our office.

Mr. Richard Croop
StID # 1138
2901 Glascock Ave.
March 31, 1994
Page 2.

Please submit the completed URF within 15 working days and the work plan for further site investigation within 45 days or by May 16, 1994.

This should be considered a formal request for technical reports pursuant to the California Water Code, Section 13267 (b). You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

enclosures (Mr.Croop only)

cc: D. James, Pacific Rim Environmental, P. O. Box 192972, San
Francisco, CA, 94119
E. Howell, files

wp-2901

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0437

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

August 14, 1989

Lisa A. Polos
Toxic Technology Services
P. O. Box 515
Rodeo, CA 94572

Dear Ms. Polos:

As requested on your letter of August 3, 1989 pertaining to File Nos. 89-6 and 89-8, we have reviewed our files on Hazardous Waste Generator, Underground Tanks (UGTs), Proposition 65 and site mitigation.

The following information is presented per your request:

OAKLAND

320 - 29th Ave.

No record

324 - 23rd Ave.

No record

(R0395) 421 - 23rd Ave.

Bay Area Petroleum Co.

Inspected 8/26/88
Interim permits issued
for 5 UGTs on 5/22/89.
No record of soil
contamination
No major violations
of the state law

R0437) 2901 Glascock

ABI Machine Shop

Inspected 7/11/86
No record of soil
contamination
No major violations
of the state law

(R02842)

(11) 2901 Glascock

Windward Yachts

Inspected 7/11/86
No record of soil
contamination
No major violations
of the state law

HAYWARD

19984 Meekland Rd. Durham Transportation

Inspected 3/3/88
Interim permits issued
for 4 UGTs on 4/20/89
Closure plans submitted
to remove 4 tanks on
7/28/89
No major violations of
the state law

128 Blossom Way

No record

50 Blossom Way

No record

(R0720) 20009 Meekland Rd. Hoang's Auto Care

Inspected 3/3/88
No record of soil
contamination
No major violations of
the state law

20008 Meekland Rd.

No record

20332 Meekland Rd.

No record

20228 Meekland Rd.

No record

This letter is limited to information available to this department and does not reflect any other information which may be accessible from other agencies or parties.

You will be billed for the provision of this service. Please find enclosed a copy of the invoice sent to our Billing Unit.

If you have any questions concerning this matter, please contact Edgar Howell, Supervising Hazardous Materials Specialist at 271-4320.

Sincerely,



Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:MAM

Enclosure