



March 29, 1994

IC Project No. 05100535

Ms. Jennifer Eberle  
Alameda County Health Care Services Agency  
Department of Environmental Health  
Division of Hazardous Materials  
80 Swan Way, Room 350  
Oakland, California 94621

VIA REGULAR MAIL

**Re: Comments from Alameda County Health Care Services Agency  
Soil Remediation and Ground Water Investigation Workplan  
Southern Pacific Transportation Company  
1399 Wood Street - Oakland, California**

Dear Ms. Eberle:

Industrial Compliance (IC), on behalf of Southern Pacific Transportation Company (SPTCo), transmitted a copy of an investigation workplan (workplan dated March 1, 1994, entitled: *Soil Remediation and Ground Water Investigation Workplan*) to the Alameda County Health Care Services Agency - Department of Environmental Health, Division of Hazardous Materials (Alameda County) for the SPTCo property located at 1399 Wood Street, Oakland, California. In a letter dated March 3, 1994 (letter entitled: *1399 Wood Street, Oakland, California 94607*), you outlined the concerns that Alameda County had regarding the workplan. These concerns were addressed in a meeting on March 21, 1994 between representatives of Alameda County and SPTCo. The purpose of this letter is to present the responses to the comments raised by Alameda County. Alameda County's comments are presented below in bold type followed by SPTCo's response in standard type.

- 1) **You proposed using the cleanup values derived in the November 1992 Risk Assessment for the 1912 - 7th Street site (see pages 17, 20-21, and 22).** ✓

Based on the results of the March 21, 1994 meeting between representatives of Alameda County and SPTCo, IC concurs with the recommendation to use a total petroleum hydrocarbon (TPH) concentration of 100 parts per million (ppm) and the U.S. EPA's Fourth Quarter 1993 Preliminary Remediation Goal (PRG) for benzene concentration of 4.6 ppm as the soil action levels. These concentrations will be used as the site soil cleanup and reuse objectives.

as per Ravi.

*This is IC's recommendation not AlCo's.*

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ALCO  
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- 2) Two of the three proposed monitoring wells are located in the backfill for the former USTs. The hydraulic parameters may vary considerably when wells are installed into backfill. The hydraulic gradient is "based on local geology," as per Figure 8. Please explain this basis in more detail. I suggest that we create an area map with our software called MapInfo, which will show the locations of nearby sites. We can then look at the hydraulic gradients of these sites; I believe we may see a very different gradient. This will determine the locations of wells.

Based on the results of the March 21, 1994 meeting, IC has revised the locations for the 3 monitoring wells as shown on the attached Figure 1. *ok*

- 3) The wells should be surveyed in relation to mean sea level (see page 24).

IC concurs with the recommendation. *ok*

- 4) Well seals should set for a minimum of 72 hours, as per Section 2649(d)(8) of 23 CCR (see page 25).

IC has commonly used the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) standards for construction of monitoring wells as described in Draft Scientific and Technical Standards for Hazardous Waste Sites, Chapter 8 - Technical Standards for the Design and Construction of Monitoring Wells and Piezometers at Hazardous Waste Sites (State of California, DTSC, August, 1990). Section 3.1.2.2 - Annular Grout Seal of this standards manual recommends a minimum set time of 24 hours for general purpose grouting cement. A copy of Section 3.1.2.2 of the draft standards is included as Attachment 1. *ok*

- 5) Disposal of purge water at the SPTCo wastewater treatment facility located on the West Oakland Yard (see page 26) should be done with EBMUD's approval. This requirement is stipulated both in a 7/31/92 letter from Joseph Damas of the Source Control Division of EBMUD to Steve Strickland of SP, and in the Wastewater Discharge Permit (Application) for SP, signed by G. F. Bozeman on 5/7/92 (permit #023-00161).

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East Bay Municipal Utility District (EBMUD) will be notified by SPTCo prior to disposal of purge/development water into the SPTCo treatment plant. *ok*

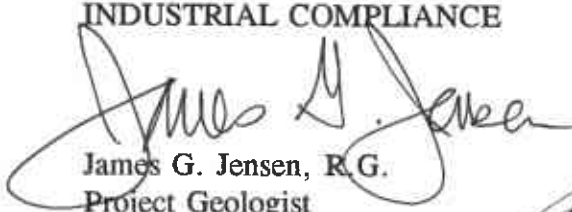
- 6) A final report should be submitted to this office within 8 weeks after completion of field work (see page 27).

IC concurs with the recommendation. *ok*

Upon approval from Alameda County of these responses, IC will prepare a revised workplan incorporating the changes. If you should have any questions regarding this information, or if you would like to discuss this material in greater detail, please do not hesitate to contact either of the undersigned at your earliest convenience at (916) 369-8971.

Sincerely,

INDUSTRIAL COMPLIANCE

  
James G. Jensen, R.G.  
Project Geologist



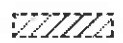


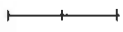




  
Mark S. Dockum, C.E.G.  
Project Manager

JGJ/MSD/dao

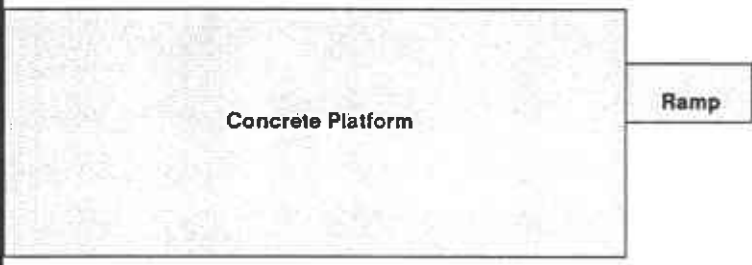
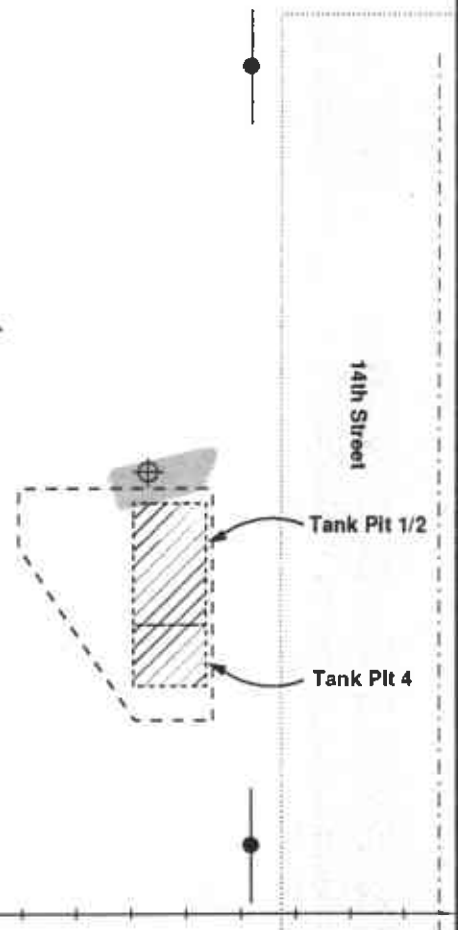
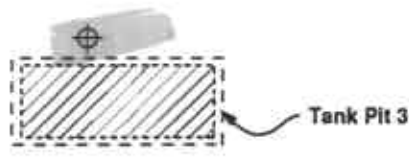
Attachment

- cc: Mr. Greg Shepherd, Southern Pacific Transportation Company (with attachment)  
Mr. Darrell Maxey, Oakland Program Office, Southern Pacific Transportation Company (with attachment)  
Dr. Ravi Arulanautham, California Regional Water Quality Control Board (with attachment)  
Mr. John Moe, Southern Pacific Transportation Company (with attachment)

**LEGEND**

-  Approximate Location of Proposed Monitoring Well
-  Approximate Limits of Proposed Excavation
-  Approximate Limits of Previous Excavations
-  Estimated Hydraulic Gradient Based on Local Geology and Proximity to San Francisco Bay
-  Fence
-  Railroad Tracks
-  Power Pole and Overhead Electrical Lines
-  Approximate Location of Sanitary Sewer Line
-  Building Structures
-  Asphalt Paved Road

Approximate Scale in Feet  

**Industrial Compliance**  
 A Subsidiary of SP Environmental Systems, Inc.



**PROPOSED LOCATIONS OF GROUND WATER MONITORING WELLS TO BE INSTALLED  
 SOUTHERN PACIFIC TRANSPORTATION COMPANY  
 1399 WOOD STREET  
 OAKLAND, CALIFORNIA**

Project No.: 05100269      Date: 03/25/94  
 Drawn By: Patti Decker      Checked By: James G. Jensen

Figure: 1  
 Page:  
 Scale: as shown