

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



20554

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

December 3, 1998  
StID # 3655

Mr. William Raymond  
Lanador Inc.  
914 Webb Lane  
Lafayette, CA 94549-3708

**Re: Closure of Monitoring Well at 925 89<sup>th</sup> Ave., Oakland CA 94621**

Dear Mr. Raymond:

This letter serves to inform you that the above site had received concurrence for site closure by the RWQCB. This letter requests the closure of the one monitoring well at this site, prior to issuance of a closure letter from our office.

You may contact Mr. Andreas Godfrey of Public Works, Water Resources at (510) 670-5575 if you have any questions regarding well closure requirements.

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

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, files

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ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0554

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

October 28, 1993  
StID # 3655

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

Mr. Bill Raymond  
914 Webb Lane  
Lafayette, CA 94549-3708

**Re: Office Meeting on the Status of Investigation at 925-89th  
Ave., former Lanaidor, Oakland CA 94621**

Dear Mr. Raymond:

This letter serves to recount our October 22, 1993 meeting at the County's office. We discussed the history of the above site and the next steps that should be taken to continue our investigation of the petroleum release from the 550 gallon gasoline tank removed in October of 1990.

I stressed the need to continue monitoring the existing two monitoring wells at this site as well as confirming the groundwater gradient by using the groundwater elevation readings from wells MW-3 and MW-4 on 910 89th Ave along with the elevations of the wells on-site. You should also send our office a copy of the report detailing the installation of the second monitoring well at your site.

As mentioned in our meeting, you will need to determine the lateral extent of the soil and groundwater contamination coming from the former tank. Because gasoline contamination (390 ppm TPHg) was found in the 11' soil boring of the second well, there is potential residual soil contamination which may directly impact the groundwater in this well. One approach has been offered to overexcavate in the area of the the second well. This is one of several approaches which can be used to address this problem. In any event, you should submit the requested report along with a work plan which describes your future remediation plans to our office within 30 days or by November 30, 1993.

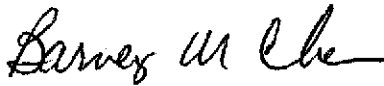
You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the requested documents will subject you to potential civil liability.

Please also note that you need not send any future reports to the Regional Water Quality Control Board (RWQCB) as all records will be maintained in our office.

Mr. Bill Raymond  
StID # 3655  
925 89th Ave.  
October 28, 1993  
Page 2.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan,  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
E. Howell, files

3wp925

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0554

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 3, 1993  
StID # 3655

Lanaidor, Inc.  
Mr. Bill Raymond  
925 89th Ave.  
Oakland CA 94621

**Re: Request for Groundwater Monitoring Report and Site Status  
for Subsurface Investigation at 925 89th Ave., Oakland**

Dear Mr. Raymond:

As you are aware, our office has been overseeing the investigation of the above referenced site since the petroleum hydrocarbon release was detected in soil samples subsequent to the removal of the 550 gallon gasoline tank in August of 1990. We have been corresponding with you and your consultant, Mr. Craig Drizin of Blymyer Engineers, Inc. One groundwater monitoring well was installed in the assumed downgradient location relative to the former gasoline tank. The groundwater direction was determined by three monitoring wells installed at 910 89th Ave., Barrett's Metal Finishing, across the street from 925 89th Ave. Further groundwater gradient measurements have yielded conflicting results, therefore it was decided to use the groundwater data from the well installed on the 925 89th Ave. site along with the groundwater data from the three wells offsite to determine the gradient on the Lanaidor site.

Blymyer's last report, dated June 26, 1992, determined the groundwater gradient as described above and it was calculated to be in the northwesterly direction. Because the Water Board guidelines require a monitoring well in the downgradient direction in order to verify impact to groundwater, Blymyer proposed an additional well in the northwest direction relative to the former tank. This well was designated MW-2L on figure 4 of this report. The conditions of the County's acceptance of this work plan was stated in my July 10, 1992 letter to you.

Over one year has passed and our office has yet to receive any reports of additional work having been performed at this site. Our office requests the continuance of quarterly monitoring for the monitoring well on your site. We also request that during this event you should also measure the groundwater elevation of the three wells offsite on 910 89th Ave. Groundwater gradient direction should be calculated using these four data points.

Mr. Bill Raymond  
StID # 3655  
925 89th Ave.  
August 3, 1993  
Page 2.

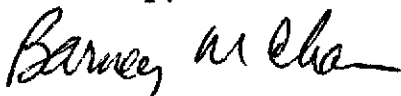
Assuming that the gradient remains consistent with the northwest direction previously reported, you should perform the installation of the proposed well, MW-2L, if this hasn't already been done. This information will be required prior to any recommendation our office makes regarding this site.

Please provide a written status of your activities at this site since July 1992 plus all reports since this time. You should also provide a schedule for your future actions. This written reply should be provided to our office **within 30 days, or by September 5, 1993.**

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267(b). Civil liabilities exist for the failure to provide the requested documents. Also be reminded that Title 23, Chapter 16, Article 5, Section 2652d of the California Code of Regulations states that until the subsurface investigation and cleanup are complete, the owner or operator shall submit reports to the local agency every three months or at more frequent intervals as specified by the local agency. In addition, the California Health and Safety Code, Division 20, Chapter 6.7, Section 25298 (c) (4) states that no person shall close an underground tank system unless the person demonstrates to the appropriate agency that the site has been investigated to determine if there are any present, or were past, releases and if so, that appropriate remedial actions are taken.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
C. Drizin, Blymyer Eng., 1829 Clement Ave., Alameda, CA  
94501-1395  
E. Howell, files

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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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 3, 1993  
StID # 3655

Lanaidor, Inc.  
Mr. Bill Raymond  
914 Webb Lane  
Lafayette, CA 94549

**Re: Request for Groundwater Monitoring Report and Site Status  
for Subsurface Investigation at 925 89th Ave., Oakland**

Dear Mr. Raymond:

As you are aware, our office has been overseeing the investigation of the above referenced site since the petroleum hydrocarbon release was detected in soil samples subsequent to the removal of the 550 gallon gasoline tank in August of 1990. We have been corresponding with you and your consultant, Mr. Craig Drizin of Blymyer Engineers, Inc. One groundwater monitoring well was installed in the assumed downgradient location relative to the former gasoline tank. The groundwater direction was determined by three monitoring wells installed at 910 89th Ave., Barrett's Metal Finishing, across the street from 925 89th Ave. Further groundwater gradient measurements have yielded conflicting results, therefore it was decided to use the groundwater data from the well installed on the 925 89th Ave. site along with the groundwater data from the three wells offsite to determine the gradient on the Lanaidor site.

Blymyer's last report, dated June 26, 1992, determined the groundwater gradient as described above and it was calculated to be in the northwesterly direction. Because the Water Board guidelines require a monitoring well in the downgradient direction in order to verify impact to groundwater, Blymyer proposed an additional well in the northwest direction relative to the former tank. This well was designated MW-2L on figure 4 of this report. The conditions of the County's acceptance of this work plan was stated in my July 10, 1992 letter to you.

Over one year has passed and our office has yet to receive any reports of additional work having been performed at this site. Our office requests the continuance of quarterly monitoring for the monitoring well on your site. We also request that during this event you should also measure the groundwater elevation of the three wells offsite on 910 89th Ave. Groundwater gradient direction should be calculated using these four data points.

Mr. Bill Raymond  
StID # 3655  
925 89th Ave.  
August 3, 1993  
Page 2.

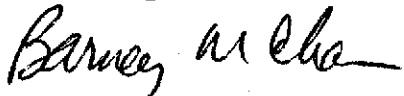
Assuming that the gradient remains consistent with the northwest direction previously reported, you should perform the installation of the proposed well, MW-2L, if this hasn't already been done. This information will be required prior to any recommendation our office makes regarding this site.

Please provide a written status of your activities at this site since July 1992 plus all reports since this time. You should also provide a schedule for your future actions. This written reply should be provided to our office within 30 days, or by September 5, 1993.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267(b). Civil liabilities exist for the failure to provide the requested documents. Also be reminded that Title 23, Chapter 16, Article 5, Section 2652d of the California Code of Regulations states that until the subsurface investigation and cleanup are complete, the owner or operator shall submit reports to the local agency every three months or at more frequent intervals as specified by the local agency. In addition, the California Health and Safety Code, Division 20, Chapter 6.7, Section 25298 (c) (4) states that no person shall close an underground tank system unless the person demonstrates to the appropriate agency that the site has been investigated to determine if there are any present, or were past, releases and if so, that appropriate remedial actions are taken.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
C. Drizin, Blymyer Eng., 1829 Clement Ave., Alameda, CA  
94501-1395  
E. Howell, files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director

State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program

RAFAT A. SHAHID, Assistant Agency Director

July 10, 1992  
STID #3655Lanaidor, Inc.  
Mr. Bill Raymond  
925-89th Ave.  
Oakland, CA 94621DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(510) 271-4320Re: Comment on June 26, 1992 Workplan for Subsurface  
Investigation at Lanaidor, Inc., 925 89th Ave., Oakland

Dear Mr. Raymond:

After speaking with Craig Drizin of Blymyer Engineers, Inc., he requested clarification regarding the proposal for the installation of an additional monitoring well at the above site. He also asked me to confer with the Regional Water Quality Control Board (RWQCB) to verify that the conditions required in the proposal would be consistent with eventual recommendation for site closure. I subsequently spoke with Lester Feldman of the RWQCB in Rich Hiett's absence. The following are the items discussed and our recommendations:

1. It is acceptable to use the three offsite wells in addition to MW-1(onsite) to determine the expected gradient on the Lanaidor site. Please confirm that MW-1 was surveyed to the same reference or arbitrary datum as were MW-2 through MW-4.
2. Method 418.1, Total Recoverable Petroleum Hydrocarbons, (TRPH), should continue to be run on MW-1 and the newly proposed well, MW-2L. As stated initially, because elevated levels of TRPH was found in a sidewall sample, it must be analyzed for in subsequent samplings. Total Petroleum Hydrocarbons as gasoline, TPHg, and BTEX (Benzene, Toluene, Ethylbenzene, Xylenes) should also be run on both wells. Upon verification of consistent gradient and chemical analysis, consideration will be given for discontinuing analysis of MW-1.
3. It is acceptable to field screen the borings from the installation of MW-2L. All "high" readings using the screening instrument should be run by the laboratory with a minimum of one sample run by the lab regardless of screening result. It is anticipated that three soil samples will be taken prior to reaching groundwater. You may contact me at (510) 271-4320 if you have any questions.

Sincerely,

Barney M. Chan, Hazardous Materials Specialist

cc: M. Thomson, Alameda County District Attorney Office  
C. Drizin, Blymyer Engineers, 1829 Clement Ave.,  
Alameda, CA 94501-1395



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0554

RAFAT A. SHAHID, Assistant Agency Director

April 2, 1992  
STID #3655

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(510) 271-4320

Lanaidor, Inc.  
Mr. Bill Raymond  
925- 89th Ave.  
Oakland CA 94621

Re: Workplan for Initial Subsurface Investigation at Lanaidor,  
Inc., 925 89th Ave., Oakland 94621

Dear Mr. Raymond:

Our office has received and reviewed the workplan for subsurface investigation at the above referenced property. This workplan dated March 31, 1992, was prepared by Mr. Craig Drizin of Blymyer Engineers, Inc. The workplan describes the installation of one monitoring well in the assumed downgradient location to the former tank pit.

Two requests were made in the workplan which I would like to comment on. The first request is that since overexcavation occurred at this site, Blymyer requests that the ten (10) feet limit for downgradient well location be relaxed so that the well may be installed in the native soil rather than backfill. This request is acceptable. The second request is for one additional groundwater elevation measurement on the wells on 910 89th Ave., formerly Barrett's Metal Finishing. If the gradient calculated from these measurements is consistent with the March 1992 and August 1989 gradients Blymyer would request that no further groundwater elevations be required. This request is not acceptable given the following facts:

1. Terratech's September 7, 1989 report reported a gradient 180 degrees opposite to that of Blymyer's March 1992 calculation.
2. The Barrett Metal Finishing site is approximately 150-200 feet from the former tank pit on the Lanaidor property. This distance is on the extreme side of what is considered a reliable distance where groundwater elevation data may be used from a nearby site.
3. Normal gradient is established over a minimum of one hydrogeologic cycle ie four quarters of normal rainfall.

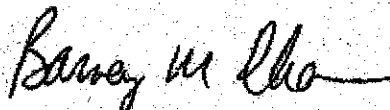
Mr. Bill Raymond  
Lanaidor Inc.  
STID # 3655  
April 2, 1992  
Page 2.

Because of these facts the County proposes the following alternative for groundwater sampling:

Monitoring wells 3 and 4 on 910 89th Ave. should be used in combination with the proposed newly located well to determine the gradient as it extends from Barrett's property to that of Lanaidor. Groundwater sampling should be done on the newly installed well quarterly and analyzed for the parameters earlier mentioned, Total Petroleum Hydrocarbon as gasoline, BTEX (Benzene, Toluene, Ethyl Benzene and Xylenes) and Oil and Grease by Methods 413.2 and 418.1. At the same time groundwater elevations in monitoring wells 3 and 4 should be performed. Please survey the newly installed well to the same datum as used for the Barrett property wells. This cumulative data will be used to verify groundwater gradient and groundwater impact and hopefully will facilitate recommendation for site closure.

Please contact me at (510) 271-4320 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: M. Thomson, Alameda County District Attorney Office  
C. Drizin, Blymyer Engineers, Inc., 1829 Clement Avenue,  
Alameda, CA 94501-1395  
R. Hiatt, RWQCB

2WP925-89th

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0554

RAFAT A. SHAHID, Assistant Agency Director

February 11, 1992

Mr. Bill Raymond  
925- 89th Ave.  
Oakland CA 94621

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(510) 271-4320

Re: Comment on Work Plan for an Initial Subsurface Investigation  
at Lanaidor, Inc., 925- 89th Ave., Oakland 94621

Dear Mr. Raymond:

Our division has reviewed the work plan for initial subsurface investigation at the above referenced site. As you are aware, this investigation was requested after soil samples from the gasoline tank removal indicated a release of gasoline of 220 ppm (parts per million). To a large extent overexcavation has removed most of the petroleum hydrocarbon conatamination with the exception of the west wall of the pit which had residual benzene and xylenes at 0.018ppm and 0.011ppm respectively.

The work plan proposes the installation of one monitoring well in the downgradient location within 10 feet to the former tank pit. Monitoring well data from the property across the street, 910 89th Ave., was used to establish the expected gradient. Please be advised that this proposal is acceptable under the following conditions:

1. The monitoring well boring logs of 910 89th Ave. are made available to our agency. The subsurface soils, groundwater depth, slit width and perforation depth interval must be similar to the well proposed for you to use the ground water elevation data.
2. You must continue to take ground water elevation measurements on the offsite wells as well as on the proposed well until which time this agency agrees that gradient data is reliable and consistent.
3. You should monitor the well for total petroleum hydrocarbons as gasoline & BTEX (benzene, toluene, ethylbenzene and xylenes). The proposal to analyze the soil samples by Methods 413.1 and 418.1 is acceptable and may influence your future ground water sampling requirements.

You may contact me at (510) 271-4320 should you have any questions.

Sincerely,

Barney M. Chan, Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
C. Drizin, Blymyer Engineers, Inc  
E. So, RWQCB 925-89thWP

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0554

July 31, 1991

Mr. Bill Raymond  
925 - 89th Avenue  
Oakland, CA 94621

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

Subject: Initial Soil and Groundwater Investigation at Lanaidor,  
925 - 89th Avenue, Oakland, CA

Dear Mr. Raymond:

We have received and reviewed the Clayton Environmental reports of September 19, 1990, and January 30, 1991. These reports document the soil sampling activities that have occurred at the above referenced site. A 550 gallon underground fuel tank was removed from this facility on August 14, 1990. Soil samples taken from the tank pit at the time of the removal had values of 220 ppm total petroleum hydrocarbons as gasoline (TPH-g) and 48 ppm TPH-g. Further excavation was done on November 16, 1990. Four confirmation samples from the sidewalls at a depth of 10 to 10.5 feet had total recoverable hydrocarbon values ranging from 20 to 330 ppm.

The next step in this process is to submit a work plan that describes an investigation to determine the lateral and vertical extent of any soil contamination and determine if groundwater has been impacted. This investigative work is to be done by a professional company knowledgeable in conducting underground tank investigations in California. The firm should be familiar with the following documents:

- Leaking Underground Fuel Tank Manual (more commonly known as the LUFT Manual), published by the State Water Resources Control Board; and
- Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites prepared by the North Coast, San Francisco Bay, and Central Valley Regional Water Quality Control Boards, dated August 10, 1990. This supplements the LUFT Manual.

All work and reports which require geologic or engineering expertise must be performed under the direction of an appropriately registered or certified professional. Examples of activities that require this expertise include borehole and monitoring well installation and logging, and impact assessments. The initial work plan is to include a site health and safety plan.

This workplan is to be submitted to our office within 45 days of the date of this letter. The workplan should address the items listed on the following pages.

### **Site History and Description**

This shall include historic site use and ownership information, a description of past activities at the site, and history of the types and locations of any hazardous materials used on site. The date of the tank installation should be provided, and a description of the tank removal activities are to be included in the report. Include a site map and a description of the hydrogeologic setting of the site.

### **Determination of the vertical and lateral extent of soil contamination.**

This shall describe the method(s) that will be used to investigate the extent of contamination.

Sampling is to follow the appropriate guidelines. Borings and wells are to be permitted through Alameda County Flood Control and Water Conservation District, Zone 7. Sample analyses are to be performed by a California certified laboratory. The samples are to be analyzed for the appropriate constituents as outlined in the Tri-Regional Recommendations.

### **Determination of Ground Water Quality.**

Ground water quality must be characterized. To determine groundwater gradient, a minimum of three monitoring wells must be installed. One monitoring well must be installed within 10 feet of the tank in the down-gradient direction. If the verified down-gradient location has been established, then one monitoring well is to be installed; however, complete gradient data must be submitted for review and approval.

Monitoring wells shall be designed and constructed to be consistent with the RWQCB guidelines and to permit entrance of any free product into the wells. The well screen must be situated to intercept any floating product from both the highest and lowest ground water levels. All wells shall be surveyed to mean sea level to an established benchmark to 0.01 foot.

Water level and free product thickness measurements shall be made in all wells before sampling is begun. The wells must be sampled for dissolved and floating constituents. Sample monitoring wells monthly for the first three consecutive months. Free product thicknesses and water levels shall be measured in all wells for each sampling event before any purging or sampling activities are begun.

A ground water gradient map shall be developed for every water level data set. If the gradient fluctuates, water level measurements must continue to be made monthly until a gradient pattern is established. Fluctuations in ground water levels due to tidal action must also be documented. After three

consecutive months of sampling, we may consider reducing the sampling frequency to every quarter for a minimum of one year, even if no contamination is identified. Water level contour maps showing ground water gradient direction, and free and dissolved product plume definition maps of each contaminant constituent should be prepared routinely and submitted with other sampling results in a technical report.

### Reporting

A technical report must be submitted within 45 days of the completion of the investigation that presents and interprets the information generated during the initial subsurface site investigation. At a minimum, the report must include the following items:

- \* site history information;
- \* boring and well construction logs;
- \* records of field observations and data;
- \* chain-of-custody forms;
- \* water level data;
- \* water level contour map showing ground water gradient direction;
- \* contaminant plume maps;
- \* tabulations of soil and ground water contaminant concentrations;
- \* status of soil contamination characterization;
- \* description of any remedial work performed;
- \* laboratory-originated analytical results for all soil and ground water samples collected;
- \* copies of TSDF to Generator manifests for any hazardous wastes hauled off site; and
- \* any recommendations for additional investigative or remedial work.

The technical report should be submitted with a cover letter from Lanaidor and received in this office by the established due date. The letter must be signed by a principal executive officer or by an authorized representative of that person.

You should be aware that this Division is working in conjunction with the RWQCB and that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and to:

Lester Feldman  
RWQCB  
2101 Webster Street, 5th Floor  
Oakland, California 94612  
(415) 464-1255

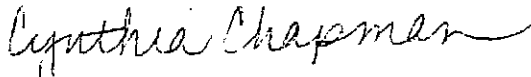
Any extensions of agreed-upon time deadlines must be confirmed in writing by either this Division or the RWQCB.

You also need to get information from the contractor who pulled the tank. This information should include a copy of the destruction certificate for the underground storage tank, manifests for any rinsate or other liquid in a tank, and a description of where the excavated soils were disposed.

To cover our costs for remediation oversight, please submit a check, payable to Alameda County, for \$670.00. Please reference Account Number 1047A.

Should you have any questions concerning this letter, please contact me at (415) 271-4320.

Sincerely,



Cynthia Chapman  
Hazardous Materials Specialist

c: Lester Feldman, RWQCB

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0554

November 2, 1990

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

Mr. Richard Silva  
Clayton Environmental Consultants  
1252 Quarry Lane  
Pleasanton, CA 94566

Dear Mr. Silva:

The Alameda County Hazardous Materials Division has reviewed the proposed workplan for Lanaidor, 925 - 89th Avenue, Oakland. This workplan describes the analyses from removal of a 550-gallon underground storage tank. The two samples taken from the excavated pit area indicated TPH-gasoline levels were at 220 ppm and 48 ppm. Clayton proposes that soils around the tank area be excavated and that confirmation samples be collected. Excavated soils will then be aerated on-site.

Task 4 of the workplan describes aeration and monitoring activities that will occur at the site. The report states that one discrete confirmation soil sample will be taken per 50 cubic yards of aerated soil, and once the level of TPH in the soil reaches 100 ppm, the soil will be disposed of at a Class II facility or backfilled into the excavation.

Please be advised that TPH contaminated soils excavated during a tank removal are NOT to be placed back into the excavation unless the following criteria are met:

1. Discrete sampling is taken per 20 cubic yards of soil.
2. TPH values are less than 10 ppm for each analyzed sample.

The activities performed at this site should be modified to accommodate this requirement.

With the 220 ppm TPH value of sample 1A, it appears that an investigation needs to be performed to determine if groundwater has



Mr. Richard Silva  
November 2, 1990  
Page 2

been impacted. This issue should be addressed in the Final Report described in Task 5 of the workplan. Please include a site map in the final report, as I have no information at what depth the original samples were taken, or the size of the stockpile soils.

If you have any questions, please call me at 415/271-4320.

Sincerely,



Cynthia Chapman  
Hazardous Materials Specialist

c: Steven Luquire, RWQCB  
Bill Raymond, Lanaidor  
Tom Ramsey, Fuel Oil Polishing

AL