

ALAMEDA COUNTY  
HEALTH CARE SERVICES



R0622

DAVE J. KEARS, Agency Director

December 28, 1993

CERTIFIED MAILER #: P 386 338 219

Federal Aviation Admin.  
0 Oakland Airport  
Oakland, 94621

UGTID:4039

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

**Re: FIVE-YEAR PERMITS FOR OPERATION OF UNDERGROUND STORAGE TANK(S)  
0 Oakland Airport Oakland, 94621**

Dear Owner/Operator:

According to our records your facility referenced above has not received a five-year permit to operate UST's. In order to obtain a permit you must complete the following items marked below and return them within 30 DAYS. The necessary forms are enclosed. You may complete a "Consolidated Underground Tank Management Plan" which will assist you in preparing a monitoring plan, site plot plan and spill response plan for your tank(s). If supplemental information or forms are required, please submit it to this office with the completed questionnaire and application forms:

- \_\_\_ 1. An accurate and complete plot plan.
- \_\_\_ 2. A written spill response plan. (enclosed)
- \_\_\_ 3. A written tank monitoring plan. (enclosed)
- \_\_\_ 4. Results of precision tank test(s), (initial and annual).
- \_\_\_ 5. Results of precision pipeline leak detector tests (initial and annual).
- \_\_\_ 6. Complete UST PERMIT FORM A-one per facility. (enclosed)
- \_\_\_ 7. Complete UST PERMIT FORM B-one per tank. (enclosed)
- \_\_\_ 8. Complete UST PERMIT FORM C-one per tank if information is available. (enclosed)
- \_\_\_ 9. Letter stating how the tank is to be maintained during one year closure.

Be advised that Title 23 of the California Code of Regulation prohibits the operation of "ANY" UST without a permit. If our records are in error, you must contact this office immediately TO AVOID POSSIBLE ENFORCEMENT ACTION. Please feel free to contact this office at (510) 271-4320; to answer any questions which may arise in completing the mandatory five-year permit process. Be prepared to provide your zip code to speak with the Hazmat Specialist handling your case.

Sincerely,

PAUL SMITH  
HazMat Specialist

c: Edgar Howell, Chief, Hazardous Materials Div. (files)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0622

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

September 1, 1993  
StID # 4039

Mr. Charles Chamness  
FAA AWP 464.10  
P.O. Box 90009, WWPC  
Los Angeles, CA 90007

**Re: Comment on August 1993 Final FAA Oakland Airport Tracon  
Facility Soil Remediation Report**

Dear Mr. Chamness:

Our office has received and reviewed the above referenced report as provided by your consultant, Advanced Sciences, Inc. This report summarizes the activities subsequent to the removal of the 1000 gallon diesel fuel tank from the above site on May 2, 1991. It also describes the investigation of petroleum contamination in the adjacent parcel. Our office agrees with the conclusions and recommendations of this report ie the soil contamination has been defined in the area of the diesel pit and the adjacent site. The majority of petroleum contaminated soil has been removed and up to now, no groundwater contamination has been noticed in the monitoring wells. You should continue to monitor the wells at this site for a minimum of four consecutive quarters. At that time, depending on the monitoring results, our office will consider the modification or suspension of monitoring and/or the recommendation of this site for closure.

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

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

cc: L. Sinfield, Advanced Sciences, Inc., 4909 Murphy Canyon Rd.  
Suite 500, San Diego, CA 94123  
E. Howell, files

2-Tracon

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0622

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

November 10, 1992  
STID # 4039

FAA-AWP-464.10a  
Attn: Mr. Charles Chamness  
P.O. Box 92007-wwpc  
Los Angeles, CA 90009

Re: Subsurface Investigation for FAA Oakland ASR #9 Facility

Dear Mr. Chamness:

Our office has completed its review of the various reports detailing the tank removal and subsequent site investigation at the above site. A number of questions have arisen from our review that our office would like comment and clarification on:

1. It appears that stockpile soils were reused at this site to backfill the excavation pit. Therefore soils as high as 144 parts per million, TPH as diesel exists in the backfilled pit. Also, though the concentration of ARS 1 (from the one end of the tank) may be atypically high at 24,000 mg/kg, no overexcavation was ever performed in the area of this sample, therefore the extent of this contamination has not been determined or remediated. Our office acknowledges that three borings were performed within the tank pit and their results indicate low hydrocarbon concentrations and that a monitoring well currently exists within this area. Be advised, because no attempt to remove contaminated soil was made, long term monitoring may be required beyond the normal minimum requirement of four quarters of non-detectable results.
2. Our office would like to know the logic in not performing the work as outlined in your 9/24/91 Remediation Plan as provided by Advanced Sciences Inc. (ASI). Recall, this plan called for the excavation of the soils exceeding 100 parts per million and confirmation sampling at a rate of 1 per every 15 linear feet of sidewall and 1 per every 100 feet of the excavation bottom. Test pits were also proposed to determine the lateral extent of contamination. This effort would have relieved the need for the long term monitoring mentioned above.
3. Please provide the analytical results of the soil samples analyzed from the borings of the three monitoring wells.

Mr. Chamness  
STID # 4039  
November 10, 1992  
ASR-9 Site  
Page 2.

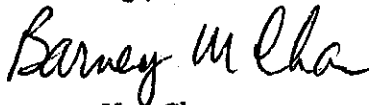
4. Please identify the locations of the samples labeled SFO-1 and SFO-2 reported in the analytical report from Calscience Environmental Laboratories, Inc. appearing in the July 1992 report. These are of concern due to their high concentrations of diesel reported.

5. As mentioned above, you must continue to monitor the three wells at this site quarterly until which time the site is recommended for case closure.

Please provide written comment to the previously mentioned issues within **30 days** of receipt of this letter.

Please contact me at (510) 271-4350 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
R. Hiett, RWQCB  
L. Sinfield, Advanced Sciences, Inc., 4909 Murphy Canyon  
Road, Suite 500, San Diego, CA 92123-4301  
N. Werner, Port of Oakland, 530 Water St., Oakland 94604  
E. Howell, files

lt

ASR9TR

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0103 (Tracon Facility L827  
1029 Grumman, Oakland)

R0622 (ASR #9, Oakland  
Airport,)

September 16, 1991

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

Mr. Jim Williams  
FAA Western Pacific Region  
FAA-AWP-464.10A  
P.O. Box 92007, WWPC  
Los Angeles, CA 90009

Subject: Unauthorized Fuel Release at FAA Airway Facilities  
L-827 Tracon and ASR #9 Facility, Oakland CA 94621

Dear Mr. Williams:

Alameda County Environmental Health, Hazardous Materials Division has received the August 30, 1991 report issued by Advanced Sciences, Inc. regarding the removal of the 1,000 gallon diesel tank at the Tracon Facility at the Oakland Airport. Based on the evidence provided in this report, the County does not agree that the contamination found at the site, soil and groundwater, is not from the existing fuel tank. The conclusion of Sarah Battelle, the registered geologist from Advanced Sciences, Inc., is that because the water sample taken from the pit contained higher than diesel hydrocarbons, this contamination is not from the pre-existing diesel tank, and that the FAA is thus not liable for any clean-up. Although this scenario does exist in specific cases where contamination is proven to have been from offsite, considerable evidence must exist for our agency to agree with this decision. To this end, you are requested to address the following items to support this above claim:

1. Please provide the chromatograms of the diesel fuel and any and all fuel oil standards ( fuel oil No.1 and No. 2 etc.) which would help to illustrate the differences in these petroleum cuts.
2. Please provide the chromatogram of the Tracon 5 "Stockpile" soil sample which contained reportedly 375ppm TPH as diesel. Please be advised that stockpiled soils are not distinguished from other typical confirmatory soil samples taken from the ends of a tank and that the 100 ppm TPH suggested in the "Tri-Regional Board Staff Guidelines" applies similarly to these results. The County recognizes that this sample was received in a broken container, however, the analytical results must also support your previous claim.
3. Please provide evidence of potential offsite sources of the fuel oil. Give data to support that the former tank pit location is directly downgradient to this source. Give evidence that the fuel used at this source matches that of the water sample's chromatogram. Monitoring well and borings data can be used as evidence. Unauthorized Release (Leak) Reports or inventory reconciliation sheets can also be used to support the contention.

Mr. Jim Williams  
FAA Tracon Facility  
September 16, 1991  
Page 2.

4. Provide a complete history of the fuel contents used at this site. Provide all inventory reconciliation and tank tightness test results on this tank.

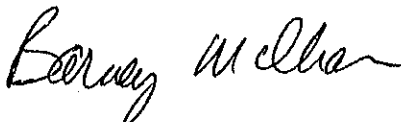
You are requested to address in writing the above items. Please provide these items within thirty (30) days of this letter. Again, be aware that this is a formal request for technical reports pursuant to the California Water Code, Section 13267 (b). Any extensions on agreed upon time deadlines must be confirmed in writing by either this Division or the RWQCB. If this above information does not support your case you will be required to provide the previously requested workplan within thirty (30) days of this decision.

**SECOND NOTICE OF VIOLATION**

In regards to the other FAA site, the ASR #9 Facility, please note that our Division has not received the requested workplan requested in our July 26, 1991 letter. Please provide this workplan within thirty (30) days of this letter.

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

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
R. Hiatt, RWQCB  
H. Hatayama, DOHS  
L. Sinfield, S. Battelle, Advanced Sciences, Inc.  
L. Mummert, FAA Western-Pacific Region  
P. Murphy, Port of Oakland, Environmental Division

Tracon1

JK