

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO# 710

RAFAT A. SHAHID, DIRECTOR

STID 3204

February 5, 1996

B.A.R.T. Maintenance Facility  
ATTN: Brent Baldwin  
P.O. Box 12688  
Oakland, CA 94604-2688

*Alameda County Environmental Health*  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510)567-6700 FAX (510)337-9335 cc:458

RE: 601 EAST 8TH STREET, OAKLAND

Dear Mr. Baldwin,

This office and the Regional Water Quality Control Board (RWQCB) have reviewed the case closure summary for the above referenced site and concur that no further action related to the underground tank release is required at this time. Before a remedial action completion letter is sent, the three onsite monitoring wells (MW-1A, MW-2A and MW-3A) should be decommissioned. Please notify this office upon completion of well destruction so a closure letter can be issued.

Information on the proper procedures for the decommissioning of monitoring wells may be obtained from Alameda County Water District - Zone 7 at (510)484-2600.

If you have any questions, please feel free to call me at (510)567-6880

Sincerely,

Dale Klettke, CHMM  
Hazardous Materials Specialist

c: Thomas Peacock, LOP Manager--files  
John H. Dailey, 141 H Street, Suite A, Petaluma, CA 94952

Be  
3204mwde.dkt

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0710

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program

April 4, 1995  
STID 3204

ALAMEDA COUNTY-ENV. HEALTH DEPT.  
ENVIRONMENTAL PROTECTION DIV.  
1131 HARBOR BAY PKWY., #250  
ALAMEDA CA 94502-6577  
(510)567-6700

B.A.R.T. Maintenance Facility  
ATTN: Richard Pasini, System Safety Dept.  
P.O.Box 12688  
Oakland, CA 94604-2688

Re: 601 East 8th St., Oakland, CA 94606

Dear Richard Pasini:

This office has received and reviewed a Quarterly Report for ground water sampling dated January 30, 1995 (cover letter dated February 27, 1995) for the above site, by John H. Dailey.

It is good to see that there is no measurable contamination in the monitoring wells. It is unusual that the groundwater is measured at below mean sea level.

If you have any questions please call this office at (510) 567-6782.

Sincerely,

Thomas F. Peacock, Supervising HMS  
Division of Environmental Protection

cc: Ariu Levi, Acting Chief - files  
John Dailey, 141 H Street, Suite A, Petaluma, CA 94952

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0710

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program

November 16, 1994  
STID 3204

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

B.A.R.T. Maintenance Facility  
ATTN: Richard Pasini, System Safety Dept.  
P.O.Box 12688  
Oakland, CA 94604-2688

Re: 601 East 8th St., Oakland, CA 94606

Dear Richard Pasini:

This office has received and reviewed a Summary Report for Additional Investigation dated August 8, 1994 and a Quarterly Report dated October 18, 1994, both by John H. Dailey.

This office accepts the recommendations on page 7 of the first report. One year of monitoring is required for case closure.

The Monitoring report did not have a site drawing and that absence makes it difficult to understand how the gradient may be changing and its relationship to the former tank areas. Please include a site drawing in the next monitoring report.

If you have any questions please call this office at (510) 567-6782.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Thomas F. Peacock'.

Thomas F. Peacock, Supervising HMS  
Hazardous Material Division

cc: Edgar Howell, Chief - files  
John Dailey, 141 H Street, Suite A, Petuluma, CA 94952

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RO710

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 19, 1994  
STID 3204

B.A.R.T. Maintenance Facility  
ATTN: Richard Pasini, System Safety Dept.  
P.O.Box 12688  
Oakland, CA 94604-2688

Re: 601 East 8th St., Oakland, CA 94606

Dear Richard Pasini:

This office has received and reviewed an Additional Investigation Summary Report dated August 8, 1994 by John H. Dailey and also 2 letters of monitoring well destruction dated September 12 and August 30, 1994.

This office agrees with the recommendations in the report on page 7. The levels of toluene and xylene are not significant. We look forward to 3 more quarters of monitoring at which time this site should be processed for closure.

If you have any questions please call this office at (510) 567-6782. Note that we have a new location and phone number.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas F. Peacock".

Thomas F. Peacock, Supervising HMS  
Hazardous Material Division

cc: Edgar Howell, Chief - files  
John Dailey, 141 H Street, Suite A, Petuluma, CA 94952

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0710

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

April 25, 1994  
STID 3204

B.A.R.T. Maintenance Facility  
ATTN: Richard Pasini, System Safety Dept.  
P.O.Box 12688  
Oakland, CA 94604-2688

Re: 601 East 8th St., Oakland, CA 94606

Dear Richard Pasini:

This office has received and reviewed a Quarterly Report and Workplan dated February 24, 1994 by John H. Dailey. The report does not have much in it as two of the three wells were dry and the third is suspect to be sampling perched water. This is an unfortunate situation. This office accepts the proposal to install three additional monitoring wells in approximately the same locations as the first set of wells.

The first set of wells should be destroyed as appropriate.

It is very difficult to know where these wells and former tank pits are located with the drawing attached. A street had been inked in and it did not identify E. 8th, E. 10th, or 5th St. I assume the street is E. 8th St. from a previous drawing. This one did not have a North arrow either. A better view of the entire site would be appreciated.

If you have any questions please call this office at (510) 271-4530.

Sincerely,

Thomas F. Peacock, Supervising HMS  
Hazardous Material Division

cc: Edgar Howell, Chief - files  
John Dailey, 141 H Street, Suite A, Petuluma, CA 94952

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0710

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

January 24, 1994  
STID 3204

B.A.R.T. Maintenance Facility  
ATTN: Mssrs. Marin & Pasini  
601 East 8th St.  
Oakland, CA 94606

Re: 601 East 8th St., Oakland, CA 94606

Dear Mssrs. Marin & Pasini:

This office has received and reviewed the Quarterly Report & Workplan for Additional Investigation dated November 12, 1993 by John Dailey and the Workplan Proposal dated December 1, 1993 by Dames & Moore respectively; and your cover letter dated December 6, 1993. The following are comments concerning these documents:

1. You need to submit site drawings with these reports showing the location of the monitoring wells. Neither proposal shows the current monitoring wells nor the location of up to two additional proposed wells.
2. The groundwater gradient has not been determined. This should be done in the next report. The next quarterly sampling should be done next month.
3. The proposals are acceptable to this office. Please call this office 48 hours prior to commencing drilling the additional monitoring wells or prior to doing the HydroPunch field work.

If you have any questions please call this office at (510) 271-4530.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas F. Peacock". The signature is fluid and cursive.

Thomas F. Peacock, Supervising HMS  
Hazardous Material Division

cc: Edgar Howell, Chief - files  
John Dailey, 141 H St., Suite A, Petaluma, CA 94952

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RO710

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 14, 1993  
STID 3204

B.A.R.T. Maintenance Facility  
ATTN: Mssrs. Marin & Pasini  
601 East 8th St.  
Oakland, CA 94606

Re: 601 East 8th St., Oakland, CA 94606

Dear Mssrs. Marin & Pasini:

This office has received and reviewed the Groundwater Sampling Reports dated March 18, 1993 and August 18, 1993 by Testing and Technology and ETC Corp. respectively; and a letter from you dated September 7, 1993. The following are comments concerning these documents:

1. There was no April 1993 report or sampling done apparently. This quarter was missed or the report not forwarded.
2. The groundwater gradient has not been determined. This should be done in the next report. The next sampling should be done next month.
3. There were no recommendations for further work or conclusions of what has been done so far in the last report. This type of analysis should be written and presented in the next report.

If you have any questions please call this office at (510) 271-4530.

Sincerely,

A handwritten signature in cursive script that reads "Thomas F. Peacock".

Thomas F. Peacock, Supervising HMS  
Hazardous Material Division

cc: Edgar Howell, Chief - files  
John Dailey, ETC Corp., 175 Cascade Ct., Rohnert Park,  
CA 94928

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RO 710

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 26, 1993  
STID 3204

B.A.R.T. Maintenance Facility  
ATTN: Mssrs. Marin & Pasini  
601 East 8th St.  
Oakland, CA 94606

Re: 601 East 8th St., Oakland, CA 94606

**NOTICE OF VIOLATION**

Dear Mssrs. Marin & Pasini:

This office has received and reviewed the Soil Remediation and Groundwater Contamination Assessment done by Subsurface Consultants dated June 20, 1991 for the underground storage tank removals performed at the above referenced site. The following are comments to be considered.

The samples that were done initially were collected in June of 1991. The Recommendations on page 20 describe the requirement for sequential quarterly groundwater monitoring. To date this office has not received any further results of groundwater monitoring.

You were told of this requirement in a letter from this office dated November 4, 1992. You responded with a letter and leak report dated December 8, 1992, saying that you would implement a quarterly groundwater monitoring program. **To date you have not implemented a groundwater monitoring program, as required.** Please respond within 30 days.

If you have any questions please call this office at (510) 271-4530.

Sincerely,

Thomas F. Peacock, Supervising HMS  
Hazardous Material Division

cc: Frank Wilson, B.A.R.T.D., 800 Madison St., P.O. Box  
12688, Oakland, CA 94604-2688  
Edgar Howell, Chief - files  
Gil Jensen, Alameda County District Attorney's Office



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0710

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 4, 1992  
STID 3204

B.A.R.T. Maintenance Facility  
ATTN: Mssrs. Marin & Pasini  
601 East 8th St.  
Oakland, CA 94606

Re: 601 East 8th St., Oakland, CA 94606

Dear Mssrs. Marin & Pasini:

This office has received and reviewed the Soil Remediation and Groundwater Contamination Assessment done by Subsurface Consultants dated June 20, 1991 for the underground storage tank removals performed at the above referenced site. The following are comments to be considered.

1. The samples that were done initially were collected in June of 1991. The Recommendations on page 20 describe the requirement for sequential quarterly groundwater monitoring. To date this office has not received any further results of groundwater monitoring. This needs to be reimplemented as soon as possible. The groundwater gradient needs to be established by the next report, if possible.
2. No Underground Tank Leak Report was filed with this office as required. The form is attached and should be completed and returned to this office for dissemination. Enclosed is a listing of information needed by the Regional Water Quality Control Board for site closure.

If you have any questions please call this office at (510) 271-4530.

Sincerely,

Thomas F. Peacock, Supervising HMS  
Hazardous Material Division

cc: R. Hiett, RWQCB  
Edgar Howell, Chief - files  
SF BART District, 800 Madison St., Oakland 94607  
enclosures

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO710

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

July 11, 1991

Mr. Charles Marin  
Sr. Resident Engineer  
BART Maintenance Facility  
601 E. 8th Street  
Oakland, CA 94606

Re: Operating Permit for the Underground Tanks at 601 E.8th St., 94606

Dear Mr. Marin:

Thank you for the copies of the precision tests on the four tanks. Enclosed please find the five year operating permit for the four underground tanks installed at the above referenced facility. Please be reminded that a written emergency response plan dealing with potential release, as required by section 2632(d)2 and 2634(e) of Title 23 California Code of Regulation, must be available onsite and that monitoring records should be maintained onsite for three years.

If you have any questions please contact me at 271-4320.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

enclosure

cc: Edgar Howell, Chief, Hazardous Materials Division  
Richard Pasini, Sr. Safety Specialist, BART Maintenance  
Facility, 601 E. 8th St., Oakland 94606

Bart-P

CB

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0710

November 28, 1990 CM # P 062 128 170

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

Mr. Richard Pasini  
BART Oakland Facility  
601 East 8th St.,  
Oakland CA 94606

**NOTICE OF VIOLATION**

Dear Mr. Pasini:

On November 20, 1990 Barney Chan, Hazardous Materials Specialist, from this office performed an inspection at the above property. During the inspection, a number of violations were noted of the California Code of Regulations, Title 22, Division 4 (22CCR) and of the California Health and Safety Code, Division 20 (CH&SC). The violations of 22CCR are:

1. Section 66508- Many containers at the facility were not properly labeled. This included approximately six 55 gallon drums which are believed to contain waste oil, waste coolant and oil and coolant. All waste containers must be labeled for contents, hazard class, name and address of generator and a start accumulation date. Hazardous waste must not be stored for more than 90 days. The sumps at the facility are assumed to be "containers" for the purpose of holding hazardous materials therefore they must be pumped out and the oil and sludge properly disposed of as hazardous material minimally once per year.
2. Section 67243- Containers holding hazardous material must be closed unless adding or removing waste. Several of the 55 gallon drums stored at the facility did not have their bungs in place. In addition, many drums had fluids accumulating on the top of the containers.
3. Section 66492- A generator shall keep a copy of each signed manifest for three years or until he receives a signed copy from the designated facility which received the waste. No copies of waste disposal manifests were available for waste oil and coolant or waste solvent from the parts cleaning tank and because of this, waste storage time limits may have been exceeded.

Mr. Richard Pasini  
BART- November 28, 1990  
Page 2.

Violations of the California Health and Safety Code :

1. Section 25189.5- The disposal of any hazardous waste at an unpermitted facility is subject to civil fines. An area on the south side of the facility where the railroad tracks meet the work bay was observed to be stained with oil. This soil should be excavated and disposed of properly.

In addition, absorbent used to soak up spilt oil must be managed according to its hazardous characteristic and the generator is responsible for classifying the waste generated.

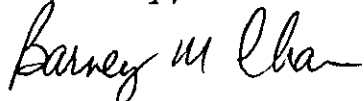
2. Section 25250.7- No person who generates used oil shall intentionally contaminate the used oil. Although it was stated to be unintentional, there is a drum labeled contaminated oil and coolant indicating that mixing of wastes is occurring.

3. Section 25124(4) defines a "waste" as material mislabeled or not adequately labeled, unless the material is labeled adequately within ten days after discovering it was not and section 66471 of Title 22 CCR requires the generator to determine whether or not the waste he generates is hazardous. At least one drum among the four which are located on the outside of the building, on the southwest side, is not adequately labeled to determine whether it contains product, waste or hazardous waste.

In accordance with Section 66328 of CCR, T22 a plan of correction must be submitted to our office within 30 days. The plan should specify the actions BART will take to address the above violations.

If you have any questions concerning this letter, please contact the undersigned, at 271-4320.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Edgar Howell, Chief Hazardous Materials Division  
Howard Hatayama, DOHS

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0710

November 28, 1990 CM # P 062 128 171

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

Mr. Richard Pasini  
BART Oakland Facility  
601 East 8th St.,  
Oakland CA 94606

**NOTICE OF VIOLATION**

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Mr. Richard Pasini  
BART- November 28, 1990  
Page 2.

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In addition, absorbent used to soak up spilt oil must be managed according to its hazardous characteristic and the generator is responsible for classifying the waste generated.

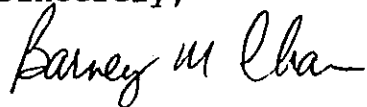
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In accordance with Section 66328 of CCR, T22 a plan of correction must be submitted to our office within 30 days. The plan should specify the actions BART will take to address the above violations.

If you have any questions concerning this letter, please contact the undersigned, at 271-4320.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Edgar Howell, Chief Hazardous Materials Division  
Howard Hatayama, DOHS

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0710

November 28, 1990

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

Mr. Richard Pasini  
BART Oakland Facility  
601 East 8th St.,  
Oakland CA 94606

**NOTICE OF VIOLATION**

Dear Mr. Pasini:

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Mr. Richard Pasini  
BART- November 28, 1990  
Page 2.

Violations of the California Health and Safety Code :

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In addition, absorbent used to soak up spilt oil must be managed according to its hazardous characteristic and the generator is responsible for classifying the waste generated.

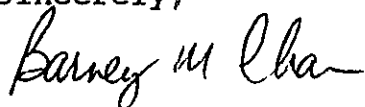
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In accordance with Section 66328 of CCR, T22 a plan of correction must be submitted to our office within 30 days. The plan should specify the actions BART will take to address the above violations.

If you have any questions concerning this letter, please contact the undersigned, at 271-4320.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Edgar Howell, Chief Hazardous Materials Division  
Howard Hatayama, DOHS





April 2, 1990

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

Mr. Chuck Marin  
BART East Oakland Maintenance Facility  
Fifth Street and 8th Avenue  
Oakland, CA

Re: Work Plan For Contaminated Soil Remediation

Dear Mr. Marin:

The Alameda County Environmental Health Department, Hazardous Materials Division has completed their review of the Work Plan submitted by Subsurface Consultants for the site shown above. Based on this review, the Division accepts your general approach to soil remediation, and groundwater evaluation. Specific comments on the plan follow.

Contaminated soil related to the waste oil excavation can be disposed of at a Class 1, 2 or 3 landfill provided the soil is properly characterized, is within the waste limits set for the Class 2 or 3 facility, and is acceptable to the Regional Water Quality Control Board (RWQCB). Soils moved under manifest must be handled by a state licensed hazardous waste hauler.

Soils impacted by the leaking underground fuel tanks can be aerated on site to below 100 ppm for TVH with the concurrence of the Bay Area Air Quality Management District (BAAQMD). Aerated soils with less than 100 ppm for TPH can be disposed of at a Class 3 facility. Movement of contaminated soils with TPH concentrations of 100 to 10 ppm to a different BART facility for temporary storage constitutes disposal at a non permitted facility, and as such will require a Report of Waste Discharge (WDR) pursuant to Section 13260(a) of the California Water Code. The SFRWQCB can waive WDR provided site specific conditions allow it, and the disposal is consistent with Subchapter 15 requirements. Remediated soils with TPH concentrations of less than 10 ppm can, provided the stockpile is less than 240 cubic yards, either be reused onsite or moved to a different BART facility without applying for a WDR.

Confirmation sampling for reuse of the aerated/remediated soils should occur at the rate of one discrete sample for every 20 cubic yards of soil. Sample analysis of soils deemed "clean" by FID

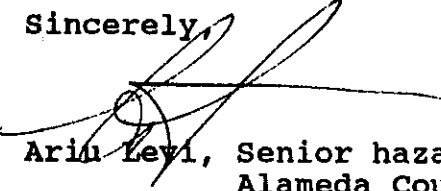
BART  
April 2, 1990  
Page 2

evaluation during excavation must, if reuse is intended, also be discrete sampled at the rate of one per 20 cubic yards. Sampling requirements for soils destined for disposal at a Class 3 facility are less stringent, and one composite sample for every 50 cubic yards is in general sufficient. Proper disposition of all soils must be supported by sample analysis by a state certified lab.

The proposed first step toward evaluating impact to ground water by the leaking UGT(s) appears to meet the initial requirements of RWQCB guidance documents. Additional requirements may be requested pending the results of this first round of work. Sampling frequency should adhere to the recommended schedule listed in an earlier letter from the Division.

Should you have any questions concerning the contents of this letter please feel free to contact me.

Sincerely,



Ariu Levi, Senior hazardous Materials Specialist  
Alameda County Environmental Health Department

cc: Gil Jensen, Alameda County District Attorney's Office,  
Consumer and Environmental Protection  
Rafat Shahid, Assistant Agency Director  
Edgar Howell, Chief of Hazardous Materials Division  
Lester Feldman, SFRWQCB  
Howard Hatayama, DOHS  
Bill Wikander, SSC  
Files

bart2

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY  
1500 Franklin Street, Oakland, California



RO710

DEPARTMENT OF ENVIRONMENTAL HEALTH SERVICES  
Hazardous Waste Remediation Program  
601 Franklin Street, Suite 2000  
Oakland, CA 94612  
(415) 271-4320

Certified Mail #P 062 127 728

December 14, 1989

Mr. Chuck Marin  
Bart Maintenance Facility  
601 E. 8th Street  
Oakland, CA 94606

Subject: Unauthorized Release  
Removal of Underground Fuel and Waste Oil Tanks  
Bart Maintenance Facility  
Oakland, CA

Dear Mr. Marin:

Thank you for submitting the results for analysis of subsurface soil and ground water samples taken in response to the underground tank removals from the above shown facility. Because of the degree of contamination found, this facility is considered to have experienced a confirmed release of petroleum hydrocarbons that has impacted subsurface soil and ground water. The extent of this contamination must be assessed and remediated.

Our office will be the lead agency overseeing both the soil and groundwater remediation of this site. The Regional Water Quality Control Board (RWQCB) is currently unable to oversee the large number of contamination cases within Alameda County and has delegated the handling of this case to our Division. We will be in contact with the RWQCB in order to provide you with guidance concerning the RWQCB's remediation requirements. However, please be aware that you are responsible for diligent actions to protect waters of the State.

To complete contaminant assessment and begin remediation, we require that you submit a work plan which, at a minimum, addresses the items listed below and presents a timetable for their completion. Please submit this workplan within 30 days of the date of this letter.

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December 14, 1989  
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## I. Introduction

- A. Statement of scope of work
- B. Site map showing location of existing and past underground storage tanks
- C. Site History
  - provide historical site use and ownership information. Include a description of types and locations of hazardous materials used on site.

## II. Site Description

- A. Vicinity description including hydrogeologic setting
- B. Initial soil contamination and excavation results
  - provide sampling procedures used
  - indicate depth to ground water
  - describe soil strata encountered
  - provide soil sampling results, chain of custody forms, identity of sampler
  - describe methods for storing and disposal of all soils

## III. Plan for determining extent of soil contamination on site

- A. Describe approach to determine extent of lateral and vertical contamination
  - identify subcontractors, if any
  - identify methods or techniques used for analysis
  - provide sampling map showing all lines of excavation and sampling points
  - if a step out procedure is used, define action level for determination of "clean" isopleth
  - provide chain of custody forms, lab analysis results, all receipts and manifests, & identity of sampler
- B. Describe method and criteria for screening clean versus contaminated soil. If onsite soil aeration/bioremediation is to be utilized, then provide a complete description of method that includes:
  - volume and rate of aeration/turning
  - method of containment and cover
  - wet weather contingency plans
  - permits obtained
- C. Describe security measures

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IV. Plan for determining ground water contamination

- Construction and placement of wells should adhere to the requirements of the "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks". Provide a description of placement and rationale for the location of monitoring wells including a map to scale.
- The placement and number of wells must be able to determine the extent and magnitude of the free product and dissolved product plumes.

A. Drilling method for construction of monitoring wells

- expected depth and diameter of monitoring wells
- date of expected drilling
- casing type, diameter, screen interval, and pack and slot sizing techniques
- depth and type of seal
- development method and criteria for adequacy of development
- plans for cuttings and development water

B. Ground water sampling plan

- method for free product measurement, observation of sheen
- well purging procedures
- sample collection procedures
- chain of custody procedures
- procedures for determining ground water gradient

D. Sampling schedule

- measure free product weekly for first month following well installation
- measure free product and dissolved constituents monthly for first three months.
- after first three months monitor quarterly.
- monitoring must occur a minimum of one year.

V. Provide a site safety plan

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## VI Development of a remediation Plan.

- A. The remediation plan is to include a time schedule for remediation, and, at minimum, must address the following issues:
- removal of all free product. Manual bailing is not acceptable as a recovery system. Actual amount of free product removed must be monitored and tabulated.
  - remediation of contaminated soils and dissolved constituents must follow RWQCB's resolution No. 68-16.
  - soils containing 1,000+ ppm of hydrocarbons must be remediated. Soils containing between 100 and 1,000 ppm must be remediated unless sufficient evidence is provided which indicates no adverse effects on groundwater will occur. Clean up of soils to 100 ppm is strongly recommended.
  - design of remedial action system should be based on a review of hydrogeologic and water quality data and on an evaluation of mitigation alternatives. The determination of probable capture zone(s) of extraction system(s) should be based on aquifer characteristics as determined by aquifer test data

## VII Reporting

- A. Technical reports should be submitted with a cover letter from Bart. The letter must be signed by an authorized representative.
- B. Monthly reports must be submitted for the next three months with the first report due 90 days from the above letter date.
- C. Quarterly reports must be submitted with the first report due 90 days after the final monthly report. These reports should describe the status of the investigation and cleanup.
- D. All reports and proposals must be signed by a California-Certified Engineering Geologist, California Registered Geologist or a California-Registered Civil Engineer (see page 2, 2 June 1988 RWQCB document). A statement of qualifications should be included in

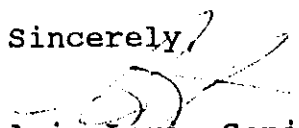
Bart  
December 14, 1989  
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all reports. Initial tank removal and soil sampling does not require such expertise; however, borehole and monitoring well installation and logging, and impact assessments do require such a professional.

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and RWQCB. 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). Failure to respond or a late response may result in referral of this case to the RWQCB for enforcement and may subject Bart to civil liabilities imposed by the RWQCB to a maximum amount of \$1,000 per day. Any extensions of agreed upon time deadlines must be confirmed in writing by either this Division or the RWQCB.

Should you have any questions concerning the contents of this letter or the status of this case please feel free to contact me.

Sincerely,



Ariu Levi, Senior Hazardous Materials Specialist  
Alameda County Hazardous Materials Program

cc: Gil Jensen, Alameda County District Attorney, Consumer &  
Environmental Protection  
Rafat Shahid, Assistant Agency Director  
Ed Howell, Chief HazMat Unit  
Lester Feldman, SFRWQCB  
Howard Hatayama, DOHS  
Inspector Dawson, OFD  
Bill Wilkander, SSC  
Files