



April 15, 1996

Ms. Susan L. Hugo
Senior Hazardous Materials Specialist
Alameda County Health Care Services
1131 Harbor Bay Parkway
Alameda, California 94502-6577

STID 5826

**SUBJECT: Response to Comments
Phase III Environmental Site Assessment
Days Inn Hotel
1603 Powell Street, Chico, California
Law/Crandall Project No. 70424-6-0004**

Dear Ms. Hugo:

Thank you for your rapid review of Law/Crandall's workplan to install six groundwater monitoring wells at the site. As discussed in your telephone conversation today with Andrew Muha, we have obtained the necessary groundwater monitoring well permits from Alameda County Zone 7, and will be mobilizing on the site this Wednesday, April 17, 1996 to install and develop the wells. We will be sampling the wells next week after the wells have had a chance to equilibrate. The following section presents our responses to the comments presented in your workplan review letter dated April 2, 1996:

- 1) Agreed. Soil samples will be collected at five-foot intervals, significant changes in lithology, within areas of significant soil staining or odors, and above the soil/groundwater interface. At least one soil sample from each boring, representing either the highest level of petroleum impact or, as a default condition, immediately above the soil/groundwater interface, will be collected for analysis. Soil sample analyses will comply with the guidelines presented in your letter. Please note that groundwater was previously encountered at a depth of five to seven feet below ground surface, which may limit our ability to evaluate the vertical distribution of petroleum hydrocarbons in the unsaturated zone.
- 2) Agreed. The wells will be surveyed to an accuracy of 0.01 foot and referenced to mean sea level by a licensed surveyor.
- 3) Agreed. Water level elevations and groundwater monitoring well samples will be collected and reported quarterly for one year, at which time Emeryville Days Limited Partnership reserves the right to request a formal re-evaluation of the site status. The groundwater gradient calculated from the water level elevations will be presented in each quarterly report.
- 4) Agreed. Proposed changes to the groundwater analytical program, primarily the elimination of analyses for chlorinated volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PAHs), methyl tertiary butyl ether (MTBE) and metals analyses, may be requested following our receipt and evaluation of the initial groundwater sample analytical results.
- 5) Agreed. Investigation-derived waste disposal activities shall be performed in accordance with applicable regulations and shall be manifested. We are currently attempting to obtain copies of waste disposal manifests and/or reports or data associated with the removal of the five underground storage tanks (USTs) in 1984. However, it appears that these activities were

ENVIRONMENTAL
PROTECTION
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performed by the building contractor and are not documented in files maintained at the Days Inn facility in Emeryville.

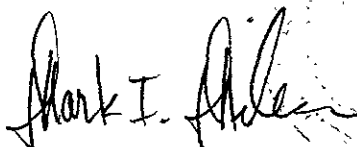
- 6a) Decline. The potential presence of free-phase hydrocarbons in groundwater will be further evaluated following the installation of the proposed groundwater monitoring wells. The need for additional borings/wells to further delineate the presence and extent of possible free-phase hydrocarbons in groundwater will be addressed at that time.
- 6b) Monitoring Well MW-4, initially located in the estimated downgradient direction from a UST reportedly servicing the Days Inn emergency generator, will be moved to a point along the northern property boundary approximately 100 feet west of the northeastern property corner. This position will help evaluate potential off-site impacts consistent with a southwesterly groundwater gradient (as reported in your workplan review letter). Well MW-4 is no longer needed to evaluate potential releases from a current UST, as we have confirmed that the UST reportedly servicing the Days Inn generator is actually an aboveground storage tank (AST) situated immediately under the generator as an integral unit. Both the generator and the AST are located on a concrete slab. As the adjacent Lyon's restaurant to the south is leasing property from Days Inn, we have moved the proposed locations for Wells MW-3 and MW-5 slightly to the south to help adjust for a southwesterly groundwater gradient.
- 7) Agreed. Our site-specific Health and Safety Plan will be submitted under separate cover.
- 8) Agreed. Please refer to the UST Unauthorized Release (Leak)/Contamination Site Report included as Attachment A.
- 9) Decline. Since we have confirmed that a UST is not associated with the emergency generator, there is no need to fill out the UST Permit Application.
- 10) Agreed. As described above, your office was notified that we will commence well installation activities on Wednesday morning, April 17, 1996.
- 11) Agreed. Reports will be submitted quarterly, and within 45 days of our completing field work at the site. The reports will include a cover letter from the responsible party, a site map with our interpretation of the extent of hydrocarbon contaminants in soil and groundwater, a description of changes in the groundwater gradient, tables of well construction parameters, water level elevations and water quality trends, and copies of laboratory analytical reports and chain of custody documents. The reports will be signed and stamped by a geologist registered in the State of California. We will include resumes of the key project individuals in the first quarterly report.

Law/Crandall looks forward to working with you on this project. Please call Mark Miller or Andrew Muha at (415) 834-2040 if you have any questions on this letter or other issues related to this project.

Sincerely,

LAW/CRANDALL

Andrew T. Muha (BY MIM
w/ PERMISSION)
Andrew T. Muha
Project Geologist


Mark I. Miller, R.G., C.E.G.
Principal Geologist

cc: Mr. Charles G. Goldman, Emeryville Days Limited Partnership

ATTACHMENT A

UST Unauthorized Release (Leak)/Contamination Site Report

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	FOR LOCAL AGENCY USE ONLY: I HEREBY CERTIFY THAT I AM A DESIGNATED GOVERNMENT EMPLOYEE AND THAT I HAVE REPORTED THIS INFORMATION TO LOCAL OFFICIALS PURSUANT TO SECTION 25180.7 OF THE HEALTH AND SAFETY CODE. SIGNED: <i>Susan L. Hugo</i> DATE: <i>4/22/96</i>
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REPORT DATE <i>0</i> M <i>4</i> M <i>1</i> D <i>5</i> D <i>9</i> Y <i>6</i> Y	CASE #
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REPORTED BY	NAME OF INDIVIDUAL FILING REPORT MARK I. MILLER	PHONE (415) 834-2040	SIGNATURE <i>Mark I. Miller</i>	
	REPRESENTING <input type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> LOCAL AGENCY <input checked="" type="checkbox"/> OTHER OWNER'S REPRESENTATIVE	COMPANY OR AGENCY NAME LAW/CRANDALL		
	ADDRESS 875 BATTERY STREET, SAN FRANCISCO, CALIFORNIA 94111			

RESPONSIBLE PARTY	NAME EMERYVILLE DAYS LIMITED PARTNERSHIP	CONTACT PERSON CHARLES G. GOLDMAN	PHONE (407) 396-6605
	ADDRESS 5820 W. IRLO BRONSON HWY, KISSIMMEE, FLORIDA	STATE 34746	

SITE LOCATION	FACILITY NAME (IF APPLICABLE) DAYS INN, EMERYVILLE	OPERATOR EMERYVILLE DAYS LTD. PART.	PHONE (510) 547-7888	
	ADDRESS 1603 POWELL STREET, EMERYVILLE, CALIFORNIA ALAMEDA			
	CROSS STREET	TYPE OF AREA <input type="checkbox"/> COMMERCIAL <input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> RURAL <input type="checkbox"/> RESIDENTIAL <input type="checkbox"/> OTHER	TYPE OF BUSINESS <input type="checkbox"/> RETAIL FUEL STATION <input type="checkbox"/> FARM <input type="checkbox"/> OTHER	

IMPLEMENTING AGENCIES	LOCAL AGENCY ALAMEDA COUNTY HEALTH CARE SERVICES	AGENCY NAME	CONTACT PERSON SUSAN L. HUGO	PHONE (510) 567-6780
	REGIONAL BOARD			PHONE ()

SUBSTANCES INVOLVED	(1) GASOLINE AND DIESEL FUELS, BTEX	NAME	QUANTITY LOST (GALLONS)
	(2) OIL AND GREASE		<input checked="" type="checkbox"/> UNKNOWN

DISCOVERY/ABATEMENT	DATE DISCOVERED <i>0</i> M <i>1</i> M <i>1</i> D <i>8</i> D <i>9</i> Y <i>3</i> Y	HOW DISCOVERED <input type="checkbox"/> TANK TEST <input type="checkbox"/> TANK REMOVAL <input type="checkbox"/> INVENTORY CONTROL <input checked="" type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> OTHER
	DATE DISCHARGE BEGAN <input checked="" type="checkbox"/> UNKNOWN	METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> REMOVE CONTENTS <input type="checkbox"/> REPLACE TANK <input type="checkbox"/> CLOSE TANK <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> CHANGE PROCEDURE <input checked="" type="checkbox"/> OTHER REMOVE 5 USTs
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE <i>8</i> Y <i>4</i> Y	

SOURCE/CAUSE	SOURCE OF DISCHARGE <input type="checkbox"/> TANK LEAK <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER	TANKS ONLY/CAPACITY GAL. _____ AGE _____ YRS <input checked="" type="checkbox"/> UNKNOWN	MATERIAL <input type="checkbox"/> FIBERGLASS <input checked="" type="checkbox"/> STEEL <input type="checkbox"/> OTHER	CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> CORROSION <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> SPILL <input type="checkbox"/> OTHER
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CASE TYPE	CHECK ONE ONLY <input type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input checked="" type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)
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CURRENT STATUS	CHECK ONE ONLY <input checked="" type="checkbox"/> SITE INVESTIGATION IN PROGRESS (DEFINING EXTENT OF PROBLEM) <input type="checkbox"/> CLEANUP IN PROGRESS <input type="checkbox"/> SIGNED OFF (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> NO FUNDS AVAILABLE TO PROCEED <input type="checkbox"/> EVALUATING CLEANUP ALTERNATIVES
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REMEDIAL ACTION	CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS)			
	<input type="checkbox"/> CAP SITE (CD)	<input type="checkbox"/> EXCAVATE & DISPOSE (ED)	<input type="checkbox"/> REMOVE FREE PRODUCT (FP)	<input type="checkbox"/> ENHANCED BIO DEGRADATION (IT)
	<input type="checkbox"/> CONTAINMENT BARRIER (CB)	<input type="checkbox"/> EXCAVATE & TREAT (ET)	<input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT)	<input type="checkbox"/> REPLACE SUPPLY (RS)

REMEDIAL ACTION	<input type="checkbox"/> TREATMENT AT HOOKUP (HJ) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> OTHER (OT)
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COMMENTS	
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