ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

March 21, 1997 STID 4609

Harry Patterson Union Pacific Railroad 1416 Dodge St. Omaha NE 68179

Ro# 736

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

1401 -

RE:

Hadley Auto Transport, aka Chrysler Auto Unloading Site, 1407 Middle Harbor Rd.,

Oakland CA 94607

Dear Mr. Patterson,

This office is in the process of closing this case. The RWQCB has just signed off on the Case Closure Summary. The wells may be destroyed. This letter is being sent to inform Zone 7 of the status of this case.

Please contact me by telephone at least 2 business days in advance of the well destruction so that I may be present onsite, if my schedule allows. You are also requested to provide a brief letter report documenting the well destruction. As soon as that report is received, a Remedial Action Completion Certificate (aka final closure letter) will be drafted, signed by our Director, and sent to you. If you have any questions, please contact me at 510-567-6761.

Sincerely,

Jennifer Eberle

Hazardous Materials Specialist

cc:

Ken Rose, USPCI/Laidlaw, 5665 Flatiron Pky, Boulder CO 80301

Attn: Wyman Hong, Alameda County Flood Control District, Zone 7, Water Agency 5997 Parkside Dr., Pleasanton CA 94588

Diane Heinze, Port of Oakland, Environmental, 530 Water St., Oakland CA 94607 Jennifer Eberle/file

ie.4609.zone7

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

DAVID J. KEARS, Agency Director

R0736

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, CA 94502-6577

(510) 567-6700

June 14, 1995 STID 4609

Harry Patterson Union Pacific Railroad 1416 Dodge St. Omaha NE 68179

1401 -

RE:

Hadley Auto Transport, aka Chrysler Auto Unloading Site, 1407 Middle Harbor Rd.,

Oakland CA 94607

Dear Mr. Patterson,

I am in receipt of the "Site Investigation Report," prepared by USPCI/Laidlaw Consulting Services, dated 6/13/95. This report documents the installation of three groundwater monitoring wells at this site. Groundwater was sampled on 3/20/95, and was non-detect (ND) for BTEX and TPHg. Low concentrations of TPHd were reported for MW2 and MW3 (up to 200 ppb), while MW1 was ND for TPHd.

Page 8 of the report recommends no further action for this site. Unfortunately, this recommendation is not acceptable. Case closure is predicated on <u>four consecutive quarters</u> of groundwater monitoring and sampling, assuming there is no soil contamination. Therefore, **you are requested to continue quarterly groundwater monitoring and sampling for three more consecutive quarters.** You are urged to immediately continue sampling, so as not to miss a <u>quarter</u>. The case can be reviewed for possible closure after another 3 quarters of sampling.

If you have any questions, please contact me at 510-567-6700, ext 6761. This is our new permanent phone number; our new fax number is 510-337-9335.

Sincerely.

Jennifer Eberle

Hazardous Materials Specialist

cc:

Ken Rose, USPCI/Laidlaw, 5665 Flatiron Pky, Boulder CO 80301

Mee Ling Tung/file

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RAFAT A. SHAHID, Assistant Agency Director

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

September 28, 1992

Tim Albright, Senior Project Supervisor USPCI 4385 E. Lowell, Suite C Ontario, Ca. 91761

1401-

Re: Excavation Project at Union Pacific, 1407 Middle Harbor, Oakland, Ca. 94607

Dear Mr. Albright,

On September 10, 1992, we learned of your excavation project to investigate the source of an oily seepage at the above site. normal procedure is to require that a work plan be submitted to us for review prior to starting a project and also that a deposit as authorized by Alameda County Ordinance Code, Article 2, 3-141.6, be included to pay for our costs to oversee the project. These costs include the review of reports and inspections. Therefore, please remit a check for \$500, payable to "County of Alameda" for the above project. Work performed by this office will be charged at a rate of \$71/hr. against your deposit. unused monies will be returned to you at the completion of the project. A workplan, "Workplan for Excavation Union Pacific Project, 1407 Middle Harbor, Oakland, Ca., Sept. 14, 1992, project 6-92-5422" was received and is being reviewed. Please continue to submit correspondence, and direct questions concerning this case to Don Hwang.

Please be advised that Alameda County Department of Environmental Health, Hazardous Materials Division, has been delegated by the California Regional Water Quality Control Board, San Francisco Bay Region, (RWQCB-SF) to oversee a large number of soil and groundwater contamination cases in Alameda County. However,

Mr. Albright Sept. 28, 1992 p. 2 of 2

since RWQCB-SF has the ultimate authority to close a case, all reports regarding environmental assessment and remediation should also be directed to Mr. Rich Hiett, California Regional Water Quality Control Board, San Francisco Bay Region, 2101 Webster St., 5th floor, Oakland, CA 94612.

Sincerely,

Paul m. Dink

Paul M. Smith Senior Hazardous Materials Specialist

cc: Susan Wickham, Senior Geologist, Environmental Science & Engineering, Inc., 4090 Nelson Ave., Suite J, Concord, Ca. 94520

Rich Hiett, Water Resources Control Engineer, California Regional Water Quality Control Board, San Francisco Bay Region, 2101 Webster St., 5th floor, Oakland, CA 94612

Ed Howell: files

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ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

September 7, 1994 STID 4609

Harry Patterson Union Pacific Railroad 1416 Dodge St. Omaha NE 68179 Alameda County CC 4580 Health Care Services Agency Dept. Of Environmental Health 1131 Harbor Bay Pkwy 2nd Flr. Alameda, CA 94502-6577

RE: Hadley Auto Transport, aka Chrysler Auto Unloading Site, 1401-1407 Middle Harbor Rd., Oakland CA 94607

Dear Mr. Patterson,

I am in receipt of a letter dated 5/10/94 from Ken Rose of USPCI, as well as the following documents: 1) "Underground Storage Tank Closure Report," for a waste oil UST and below ground clarifier removed on 12/10/91, dated 5/3/94, prepared by USPCI, 2) "Final Closure Report," for four USTs removed on 2/20/91, dated 11/21/91, prepared by USPCI, and 3) "Report of Excavation," for an oil seep, dated 11/3/92, prepared by Environmental Science & Engineering.

The first item documents contamination as high as 5,450 ppm TPH by 418.1 in the clarifier pit and 15,200 ppm TPH by 418.1 in the waste oil pit. The soil was reportedly further excavated and resampled on 12/15/91. Verification soil sample results indicated up to 455 ppm TPH by 418.1, and some volatile organic compounds (VOCs) by 8240.

The second item documents contamination as high as 359 ppm TPH-motor oil in soil, and 11,000 ppb TOG in groundwater in the vicinity of the new oil UST. The soil was reportedly further excavated and resampled on 3/1/91. Only 22 ppm of hydrocarbons in the C10 to C50 range were detected.

The third item documents excavation and sampling activities associated with an oily seepage emanating from the asphalt pavement near an abandoned building. It appears that up to 6,450 ppm TPH-diesel in soil was left in place in the sidewall, due to site constraints.

There is no documentation in this file of any groundwater monitoring well installation. Groundwater is rather shallow in this area—most likely less than 10' in depth. Due to the significant soil concentrations encountered during these investigations, you are requested to submit a workplan for a groundwater investigation within 60 days, or by November 7, 1994. Please include a map indicating the former five UST excavations, the clarifier excavation, as well as the area of the oily seepage.

September 7, 1994 STID 4609 Harry Patterson page 2 of 2

If you have any questions, please contact me at 510-567-6700, ext 6761. This is our new permanent phone number; our new fax number is 510-337-9335.

Please notify me at least 2 business days in advance of field activities so that I may arrange to be onsite.

Sincerely,

Jennifer Eberle

Hazardous Materials Specialist

cc: Ken Rose, USPCI, 5665 Flatiron Pky, Boulder CO 80301 Ed Howell/file

je 4609

Department of Environmental Health Hazardous erials Division 80 Swan Way, Room 200 SITE: 1401-1407 Middle Oakland, CA 94621 Harbor.

R0736

Telephone Number: (415) 271-4320

November 4, 1988

Mr. J. Raymond Stockton Vice President Sherex Chemical Company, Inc. 5777 Forantz Road P. O. Box 646 Dublin, CA 43017

Dear Mr. Stockton:

This letter will serve to complete the Alameda County Health Department review of your now closed chemical manufacturing site formerly located at 1401 Middle Harbor Road, Oakland, CA 94607. Before discussing our findings, a brief review of the Alameda County Health Department's role would be useful.

BACKGROUND

On June 26, 1986, the Health Department received a notice that illegal mixing of hazardous wastes and improper disposal of residues were occuring during the closure of your facility. On June 11, 1986, a notice of violation was issued to Mr. Ralph Fisher charging that regulations regarding the treatment and management of the wastes were violated and requesting a plan of correction be submitted to this office. The mixing that occured involved Aerosurf (a quaternary fatty acid ammonium chloride) and fatty acid nitrile residues which also included 10 - 40% zinc oxide. The mixing operations were performed on a concrete pad but residues were spread over areas beyond the pad.

On July 18, 1986, the Alameda County Health Department approved the submitted work plan by Ecology and Environment which called for a multiphase investigation of the site as well as a draft site characterization plan. It should be noted that the plan was apparently prepared in response to situations arising from the plant closure and only partially related to the incident that occured on June 26, 1988.

Sherex Chemical Co., Inc. November 4, 1988 Page 2 of 2

In addition, the California Department of Health Services had previously conducted several inspections of the facility. The Alameda County Health Department also conducted several inspections of the facility. It appeared as of July 1986, that the California Department of Health Services was unaware of the plant closure. The Alameda County Health Department had been verbally informed that a plant closure was anticipated in March of 1986 but was not officially notified prior to the mixing incident. It should be noted that there is no provision in California law requiring a generator of hazardous waste to notify the administering agency of a pending closure.

Over the next year, a site characterization plan in three phases was submitted. The Alameda County Department of Health responded with comments on August 3, 1987. A phase IV soil and ground water investigation was submitted by Sherex as well as additional information during the subsequent year. The site was inspected several times prior to the final inspection on September 7, 1988. On December 24, 1987, a fine was assessed on Sherex in connection with the violations occurring on June 26, 1986.

FINDINGS

The Oakland site was a chemical plant primarily for the conversion of derivatives of natural fats and oils for the preparation of fabric softeners, personal use products, and hair conditioners. The principal processes at the site involved converting fatty acids with ammonia to the corresponding nitrile, hydrogenation of the nitriles to amines, quaternization of the amines with the alkylating agent methyl chloride. The plant is now completely dismantled and the site is graded.

Two specific groundwater investigations, a four phase soils investigation and supplemental reports over the period plan closure have been reviewed by this office. The following findings pertain to the present site condition:

1. Soil Contamination Level

As of June 16, 1988, elevated hydrocarbon contamination to 4200 ppm remained in the amine reactor area. Composite samples from the perimeter of the excavation showed a range of concentrations of ethyl benzene, toluene and xylenes at ranges of 10 - 30 ppm. Total petroleum hydrocarbons were found at 500 ppm. A site inspection of the property on June 23, 1988 revealed some obvious areas of oil contamination. Additional soil was removed since that time but no further analytical work was done.

Sherex Chemical Co., Inc. November 4, 1988 Page 3 of 3

WELL DATA

Monitoring well data indicates concentrations of materials commonly from 3 - 100 ppm and typically in the 20 - 30 ppm range. Other well parameters show benzene at 0.12 ppm, ethyl benzene at 0.15 ppm, toluene at 0.20 ppm, xylenes at 1.0 ppm and Cr(VI) at 0.02 - 0.149 ppm. The monitoring wells have not been preserved at the site.

It is the understanding of this department that the intended site use is for a truck cargo container storage and packing area. data indicates that the site still contains residues from the plant operation, mostly of a hydrocarbon nature, such as would be anticipated from plant operations and spills. As such the site would still be considered a hazardous waste property although this need not preclude its use in certain industrial type settings. Proposed construction activities can proceed provided that any waste removed from the site be managed as a hazardous waste and appropriate occupational safety precautions are followed. construction plans should include a hazardous waste management plan to include an on-site industrial hygienist, a safety plan, and consultants familiar with constructing in such a milieu. addition a groundwater monitoring plan should be prepared to properly determine the vertical and horizontal extent of the contamination.

These findings are subject to any further comments or review that the CA Department of Health Services or the San Francisco Regional Water Quality Control Board may have regarding this site.

If you have any questions, please contact Lowell Miller, Senior Hazardous Materials Specialist at 415/271-4320.

Sincerely,

Rafat A. Shahid, Chief

Hazardous Materials Division

RAS: LM: mam

cc: SFRWQCB

Dwight Hoenig, CA Department of Health Services Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection Division Dave Canterbury, Sherex

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY Agency Director

R0736

470-27th Street, Third Floor Oakland, California 94612 (415)

July 18, 1986

Mr. Ralph Fisher Sherex Chemical Co. 1401 Middle Harbor Rd. Oakland, CA 94607

We are in receipt of the following:

- 1. Letter from Pillsbury, Madison & Sutro dated July 7, 1986
- 2. Letter from ecology and environment, inc. dated May 21, 1986
- 3. Plot Plan of the Sherex facility dated 3-27-85
- 4. Site Characterization Plan for Sherex Chemical Co., Oakland prepared by ecology and environment, inc.

After reviewing this information it appears that the clean up plan is well thought out and should discover any environmental problems or contamination that may exist. We appreciate you cooperation in this matter and look forward to reviewing the rest of the documents which your company will receive during the dismantling of your chemical plant.

Should you have any questions in the future please refer them to Thomas Peacock, Hazardous Material Specialist of this office.

Sincerely,

Rafat A. Shahid, Manager Hazardous Materials Unit

RAS:tfp