

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



20789

November 12, 1997

Betty Christian
720 Gelston Place
El Cerrito CA 94530

Menas Christian
c/o Betty Christian

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

RE: Risk Evaluation for 1111 Pine St., Oakland 94607 (Our site # 247)

Dear Mrs. Christian and Mr. Christian:

I have reviewed the site file and discussed the case with my colleagues at this Office. As we discussed by telephone, I am not able to issue a closure letter at this time for the following reasons:

- Benzene has been detected at concentrations that exceed conservative human health risk screening levels. The highest concentrations of benzene were found in soil located along the north west wall of the former tank pit and within a tank that was abandoned in place. These sources are located within a few feet of the building. Little is known about the extent and concentration of the concentration beyond the immediate area of the sampling.
- Information available about site geology and groundwater flow at the site is not sufficient for me to conclude that no further action is needed. There is no definite information about the groundwater flow direction, and geology appears variable from one boring to the next. Assumed groundwater flow would tend to move contaminants under the building, which would increase potential human health risk to anyone using the premises. Also, one of the borings between your property and a neighboring auto wrecking yard showed higher contaminant concentrations than the other six borings. Thus, it is necessary to confirm groundwater flow direction and to determine whether the geology is more likely to be a barrier to or a conduit for contaminant dispersal from the source area.

An appropriate next step toward case closure is to have a risk evaluation performed by a qualified consultant. The risk assessor needs to follow the procedures outlined in *ASTM E 1735 - 95 Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites*. The risk evaluation would be used to determine whether the benzene levels remaining in place pose a significant human health risk given the site conditions, whether additional investigation or remediation is needed, and whether any use restrictions would be appropriate for the property.

As we agreed, we will meet soon to further discuss this agency's requirements for the site. In the meantime, you may contact me at (510)567-6770 with any questions.

Sincerely,

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Gordon Coleman, Alameda County Environmental Health Services

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20789

STID 247

January 15, 1997

Messrs. Nick and Menas Christian
N. H. M. Enterprises
1111 Pine Street
Oakland, CA 94607

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

RE: BONNELLIE ENTERPRISES, 1111 PINE STREET, OAKLAND, CA 94607

Dear Mr. Christian:

This office recently completed a review of the case file for the above referenced Oakland site up to and including the Levine-Fricke (L-F) "Soil and Ground-Water Quality Assessment dated October 5, 1995. This report documents the advancement of seven (7) soil borings and the collection of "grab" groundwater samples from each of the borings. Results of the laboratory analysis of the collected soil samples found non-detectable concentrations of total petroleum hydrocarbons as gasoline (TPHg) and the aromatic hydrocarbons benzene, toluene, ethyl benzene and total xylenes (BTEX), with the exception of soil boring SB6. SB-6 detected total xylenes at a concentration of 43 ppb, from the soil sample collected at a depth of six (6) feet below grade (bg). Groundwater samples were also found to contain non-detectable concentrations of TPHg and BTEX, with the exception of the groundwater sample collected from boring SB2. However, the groundwater sample collected from boring SB2 revealed TPHg and BTEX at concentrations of 28,000 ppb, 35 ppb, 1100 ppb, 720 ppb and 8100 ppb, respectively.

Your consultant, Levine-Fricke has requested case closure for this site. However, in order to proceed with case closure for this site the following information is being required by this office:

- ◆ copies of manifests/bill of ladings for the disposal of approximately 250 cubic yards of contaminated soil which was removed. These soils supposedly were disposed of at Forward Landfill in Stockton (from file notes).

Please be advised that this letter constitutes a formal request for technical reports pursuant to California Water Code Section 13267(b) and Health and Safety Code Sections 25299.37 and 25299.78.

In the event that you any questions, please feel free to contact Thomas Peacock directly at (510)567-6782.

Messers Nick and Menas Christian
RE: Bonnellie Enterprises, 1111 Pine Street, Oakland
January 15, 1997
Page 2 of 2

Sincerely,

Dale Klettke, CHMM
Hazardous Materials Specialist

c: Bob Chambers, Alameda County District Attorneys Office
John Sturman, P.E., R.G., c/o Levine-Fricke, 1900 Powell St, Emeryville, CA 94608
Thomas Peacock--files

Be

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0789

10/25/94
STID 247

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

Nick and Menas Christian
Bonnelli Enterprises
1111 Pine St.
Oakland CA 94607

Dear Mr. and Mr. Christian,

I am in receipt of a Work Plan for Preliminary Soil and Ground-water Quality Assessment, prepared by Levine-Fricke, dated 10/18/94. This work plan involves 5 or 6 soil borings and grab ground water samples, in the vicinity of the former 500-gallon gasoline UST.

The workplan is acceptable. Please note that permanent groundwater monitoring wells may be required in the future.

We have not received results from the pit water sample taken on 9/30/93. These results were not included in the documents from Larry Lidster, received here on 8/10/94. I assume that you have these results, as you indicated that you paid the laboratory. Please submit these results to this office.

If you have any questions, please contact me at 510-567-6761.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: John Sturman, Levine-Fricke, 1900 Powell St., 12th Floor,
Emeryville CA 94608
Ed Howell/file

je 247

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0789

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

August 15, 1994
STID 247

Nick Christian
Bonelli Enterprises
1111 Pine St.
Oakland CA 94607

Alameda County CC 4580
Health Care Services Agency
Dept. Of Environmental Health
1131 Harbor Bay Pkwy 2nd Flr.
Alameda, CA 94502-6577

Dear Mr. Christian,

PLEASE NOTE THAT OUR NEW ADDRESS IS 1131 HARBOR BAY PARKWAY, 2nd FLOOR, ALAMEDA CA 94502-6577.

We are in receipt of your fax dated 7/26/94, which includes the laboratory report for a composited sample of the sand inside the second UST found onsite. These results indicate that the sand does not constitute hazardous waste. The UST was located directly beneath a utility line, and was probably filled with sand as an acceptable means of closure at the time. Therefore, you will not be required to remove this UST.

However, significant concentrations of hydrocarbon contaminants in the soil and groundwater beneath the site were detected during removal activities for the first UST (500-gallon) in September 1993. As you know, 6,600 parts per million (ppm) of Total Petroleum Hydrocarbons as gasoline (TPH-g) and 63 ppm benzene were detected below the UST during removal on 9/2/93. The UST pit was overexcavated to remove contaminated soil, then resampled on 9/30/93. Results indicated concentrations as high as 11,000 ppm TPHg and 130 ppm benzene in soil. A sample was collected of the water present in the excavation; results indicated concentrations as high as 50,000 parts per billion (ppb) TPHg and 2,000 ppb benzene.

Due to these significant concentrations of hydrocarbons, further investigation must be conducted to determine the lateral and vertical extent of soil and groundwater contamination. It is possible to do this work in phases. **Therefore, we are requesting that you submit a workplan for the delineation of soil and groundwater contamination within 45 days, or by September 30, 1994.**

All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; and b) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted **under seal** of a California-Registered Geologist, - Certified Engineering Geologist, or -Registered Civil Engineer.

Nick Christian
STID 247
August 15, 1994
page 2 of 2

There are state funds available for remediation of UST sites. These funds reimburse responsible parties, such as yourselves, for the costs associated with remediation. I have enclosed a brochure outlining this program. Please note that you must get three bids for work before selecting a contractor/consultant, in order to be eligible for reimbursement funds. In addition to the phone numbers listed in the attached brochure, Christopher Stevens of the State Water Resources Control Board (916-227-4519) can answer questions regarding which types of activities are reimbursable.

Please note that reports and documents no longer need to be copied to the Regional Water Quality Control Board. Kindly submit a cover letter with your consultant's reports. If you have any questions, please contact me at 510-567-6700.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: John Sturman, Levine-Fricke, 1900 Powell St., 12th Floor,
Emeryville CA 94608
Ed Howell/file

je 247-C
attachment

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0789

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 4, 1994
STID 247

Nick Christian
Bonnelli Enterprises
1111 Pine St.
Oakland CA 94607

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

Dear Mr. Christian,

This letter serves to document our phone conversation today, in which you indicated that you were of the understanding that Environmental Testing and Construction (ETC) had properly completed their duties regarding the removal of the UST at your site. However, as of this date, this office has not received a tank removal report, which is required within 60 days of the tank removal, as per the Underground Storage Tank Closure Plan signed by both Gernot H. Geldon of ETC and yourself on 8/6/93 and 8/23/93, respectively. In addition, we have not received an Unauthorized Leak Report (ULR). I have enclosed an ULR form for your convenience. Please fill this in and submit it to this office immediately. Please contact me at 510-271-4530 if you need assistance.

ETC left both of us under the impression that a remediation workplan would be submitted to this office, as would results for sand sampled from inside a second UST found onsite. To date, these documents have not been submitted. I phoned Coast to Coast Analytical Services in San Jose at 408-955-9077. I was only able to leave a message regarding whether the sand samples were analyzed.

In addition, we have not received documentation of stockpiled soil disposition. (This documentation is often contained in the tank removal report.) You indicated that ETC removed the stockpiled soil, and brought in a different stockpile, then backfilled the excavation and repaved it.

Enclosed is information on consultants and the UST reimbursement fund, as we discussed. Under the circumstances, we will allow a 30-day extension for the due date of the workplan, as requested in our letter dated 4/25/94. The new due date is 6/25/94. If you have any questions, please contact me at 510-271-4530.

Nick Christian
May 4, 1994
STID 247

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Larry Lidster, Environmental Testing and Construction, 175
Cascade Ct., Rohnert Park CA 94928
Ed Howell/file

je 247-B attachment

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0789

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

April 25, 1994
STID 247

Nick Christian
Bonnelli Enterprises
1111 Pine St.
Oakland CA 94607

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

NOTICE OF VIOLATION

Dear Mr. Christian,

On 10/7/93, we sent you a letter requesting a workplan for the delineation of soil and groundwater contamination within 45 days, or by 11/22/93. This letter has not been responded to. We received a fax from Environmental Testing and Construction (ETC) on 10/25/93, stating that the workplan would be submitted by 11/22/93. However, we have not received any such workplan.

Please be advised that "no person shall close an underground tank system unless that 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 corrective or remedial actions have been taken," as per Section 25298 (c) (4) of the California Health & Safety Code, (CH&SC) Division 20, Chapter 6.7. Further, "any operator of an underground tank system shall be liable for a civil penalty of not less than five hundred dollars (\$500) or more than five thousand dollars (\$5,000) for each underground storage tank for each day of violation for. . . failure to properly close an underground tank system," as per Section 25299 (a) (5) of CH&SC, Division 20, Chapter 6.7.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Therefore, we request a workplan for the delineation of soil and groundwater contamination within 30 days, or by May 25, 1994. The workplan should be submitted under cover letter from yourself, and prepared by a recognized professional as outlined below.

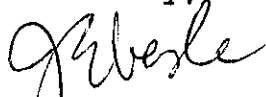
All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; and b) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.

April 25, 1994
STID 247
Nick Christian
page 2 of 2

Please note that with the exception of closure reports, routine reports and documents no longer need to be copied to the Regional Water Quality Control Board. If you have any questions, please contact me at 510-271-4530.

Lastly, please indicate the status of the stockpiled soil. My communication with ETC stopped after they sent me laboratory results for the stockpiled soil via fax on 10/25/93. I have left five phone messages for Larry Lidster of ETC since that time. My messages have not been returned.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Larry Lidster, Environmental Testing and Construction, 175
Cascade Ct., Rohnert Park CA 94928
Ed Howell/file

je 247-A

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0789

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

October 7, 1993
STID 247

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

Nick Christian
Bonnelli Enterprises
1111 Pine St.
Oakland CA 94607

Dear Mr. Christian,

We are in receipt of laboratory results for the samples taken from the underground storage tank (UST) excavation at this site in September. As you know, 6,600 parts per million (ppm) of Total Petroleum Hydrocarbons as gasoline (TPH-g) and 63 ppm benzene were detected below the UST during removal on 9/2/93. The UST pit was overexcavated to remove contaminated soil, then resampled on 9/30/93. Results indicated concentrations as high as 11,000 ppm TPHg and 130 ppm benzene in soil. A sample was collected of the water present in the excavation; results indicated concentrations as high as 50,000 parts per billion (ppb) TPHg and 2,000 ppb benzene.

Due to these significant concentrations of hydrocarbons, further investigation must be conducted to determine the lateral and vertical extent of soil and groundwater contamination. It is possible to do this work in phases. Therefore, we are requesting that you submit a workplan for the delineation of soil and groundwater contamination **within 45 days or by November 22, 1993.**

In the meantime, your contactor Environmental Testing and Construction (ETC) has indicated that further excavation may jeopardize the integrity of the building. For this reason, approval is given to backfill the excavation with clean fill. ETC also proposes remediation procedures. These two items were discussed during a telephone conversation between Larry Lidster of ETC and myself on 10/6/93. We are also in receipt of a letter from ETC dated 10/6/93 which indicates the same.

As you know, a second UST was discovered during overexcavation activities. This UST was filled with sand which had a gasoline odor. Two samples were collected of the sand. Results indicated concentrations as high as 1,600 ppm TPHg and 15 ppm benzene. The sand will be further analyzed to determine if it constitutes hazardous waste. This was discussed between Larry Lidster of ETC and myself on 10/6/93.

All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; and b) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted **under seal** of a California-Registered Geologist, - Certified Engineering Geologist, or -Registered Civil Engineer.

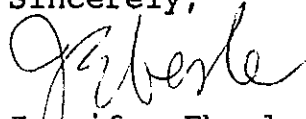
Nick Christian
STID 247
October 7, 1993
page 2 of 2

R0789

Please note that reports and documents no longer need to be copied to the Regional Water Quality Control Board. Kindly submit a cover letter with your consultant's reports. If you have any questions, please contact me at 510-271-4530.

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: Larry Lidster, Environmental Testing and Construction, 175
Cascade Ct., Rohnert Park CA 94928
Ed Howell/file

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