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RUST Rust Environment & Infrastructure Inc.

A Rust International Company Phone 518.458.1313
12 Metro Park Road Fax 518.458.2472
Albany, NY 12205

October 23, 1997

Stephen I. Morse
Supervising Water Resources Control Engineer
San Francisco Bay Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, CA 94612

Barney M. Chan
Hazardous Materials Specialist
Department of Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, California 94502

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RECEIVED
ENVIRONMENTAL

RE: American National Can Company
Former Oakland, California Facility

Dear Sirs:

American National Can Company (ANC) has completed a site-wide environmental restoration of their former can manufacturing facility located at 3801 East 8th Street, Oakland California. The subject site is now a retail shopping center operated by Kmart. Over the past seven years, ANC completed the investigation of soil and groundwater contamination in an area of the site designated "Area 3." As part of a Sitewide Risk Management Plan (SRMP), developed with your Agencies, groundwater monitoring has been conducted in Area 3 for the past 2 years. The requirements of the SRMP for Area 3 have been completed. Consistent with the SRMP, please approve closure of Area 3 by way of a letter stating that no further investigation, remediation or groundwater monitoring is required. Enclosed is a completed Site Closure Summary form for Area 3. Following is a summary of investigation, remedial, and monitoring activities that have been performed in Area 3. This information summarizes the basis by which closure of this area is now deemed appropriate.

Area 3 is located in the southeastern corner of the site, adjacent to the Ekotek Lube property. Soil and groundwater samples collected during site investigations were found to be contaminated by various volatile and semi-volatile organic compounds and polychlorinated biphenyls (PCBs). Some of the monitoring wells contained floating product. In general, the concentration of contaminants in soil and groundwater increased toward the Ekotek Lube property boundary. Groundwater elevation monitoring during the investigations demonstrated that an abnormality in the regional groundwater gradient (groundwater mound) exists beneath the Ekotek Lube property which causes groundwater

Stephen I. Morse and
Barney M. Chan
October 23, 1997
Page 2

to flow into Area 3 from the southeast. The results of these investigations demonstrated that the contamination in Area 3 originated at an off-site source, southeast of the former ANC property.

Regional groundwater flowing towards the southeast has limited the extent to which impacted groundwater has migrated onto the former ANC property from Ekotek Lube. The western limit of Area 3 contamination is located on Kmart's property, beneath where ANC's Building #12 was formerly located. The regional groundwater flow also redirects the impacted groundwater in Area 3 back to the suspected source property.

ANC retained Soma Environmental Engineering, Inc. to prepare a baseline Human Health Risk Assessment (HRA) for Area 3 of the site. The HRA, dated December 7, 1993, concluded the potential for public health risks existed if groundwater was used for consumptive purposes. However, no other potential health risks to the general public, including Kmart customers, employees or construction workers were identified. ANC filed a deed restriction to prevent the usage of groundwater from the entire subject property, including Area 3. As a result, there are no exposure pathways or receptors for the contamination in Area 3. A copy of the deed restriction is attached to the enclosed Site Closure Summary form.

Remedial activities in Area 3 have included periodic floating product removal from the ANC monitoring wells during quarterly monitoring events. At the adjacent Ekotek Lube site, the owners initially evacuated and sealed underground sumps. More recently, the owners removed all of the subsurface structures at the Ekotek Lube site and paved much of the surface of that site to decrease infiltration.

A groundwater monitoring program performed in Area 3 as part of the SRMP included quarterly sampling and analysis and monthly water level and product thickness monitoring. The intent of the program was to provide data regarding groundwater conditions (i.e.; groundwater quality, groundwater mound height and product thickness) to the RWQCB and ACDEH so that the effectiveness of remedial measures taken on the Ekotek Lube property could be assessed. The past 1½ years of groundwater monitoring revealed no significant changes in the groundwater mound beneath the Ekotek Lube property. Because of these results, the effectiveness of the remedial measures taken on the Ekotek Lube property could not be conclusively demonstrated through the SRMP.

There is no longer a need to gather additional subsurface information on the former ANC property for several reasons. First and foremost Kmart and ANC, on the one hand, and Ekotek and the Websters, on the other, have reached an agreement allocating responsibility among themselves for the affected soil and groundwater in Area 3 and the adjacent Ekotek Lube site. Under that agreement, ANC will be responsible for affected soil and groundwater in Area 3, while Ekotek and the Websters

Stephen I. Morse and
Barney M. Chan
October 23, 1997
Page 3

will be responsible for affected soil and groundwater on the Ekotek Lube site, including any actions required by the Regional Board to prevent contamination at the Ekotek Lube.

Second, the extent of impact on the Kmart property has been fully determined and the monitoring has demonstrated that remaining risks are acceptable in the affected area. Moreover, given the deed restriction on groundwater usage, there are no exposure pathways or receptors for the Area 3 contamination. Based on this, further investigation, remediation, or monitoring in Area 3 is not necessary.

Upon receipt of a "no further action" letter from your agency, ANC intends to close all monitoring wells in Area 3 in compliance with the requirements of the Alameda County Flood Control and Water Conservation District - Zone 7. Those wells will be closed within 30 days after receipt of the no further action letter and a report documenting the well closure activities will be submitted to your attention.

Please contact me at (518) 437-8373 if you have any questions or require additional information. Thank you for your cooperation in this matter.

Sincerely,



Edward W. Alusow
Senior Project Manager

Enclosures

cc: R. Rivetna
P. Cafferty, Esq.
R. Williams
D. Bruegel, Esq.
R. Creps

SITE CLOSURE SUMMARY

I. AGENCY INFORMATION

Date:

Agency Name: S.F.B.R.W.Q.C.B.	Address: 2101 Webster Street
City/State/Zip: Oakland, CA 94612	Phone: (510) 286-1255
Responsible Staff Person: Sum Arigala	Title: Water Resources Control Engineer

II. SITE INFORMATION

Site Facility Name: KMART (formerly American National Can Company) AREA 3				
Site Facility Address: 3801 East 8th Street, Oakland, CA 94601				
RB LUSTIS Case No.:	Local or LOP Case No.:	Priority:		
URF Filing Date:	SWEEPS No.:			
Responsible Parties (include addresses and phone numbers)				
Contaminant migration onto property from off-site source.				
Tank No.	Size in Gallons	Contents	Closed In Place/Removed?	Date

III. RELEASE AND SITE CHARACTERIZATION INFORMATION

Cause and Type of Release: Contaminant migration onto property from off-site source.			
Site characterization complete? <input checked="" type="radio"/> Yes <input checked="" type="radio"/> No	Date Approved By Oversight Agency:		
Monitoring wells installed? <input checked="" type="radio"/> Yes <input checked="" type="radio"/> No	Number: 12	Proper screened interval? <input checked="" type="radio"/> Yes <input checked="" type="radio"/> No	
Highest GW Depth Below Ground Surface: 14.29'	Lowest Depth: 7.47'	Flow Direction: W/NW	
Most Sensitive Current Use: Parking Lot			
Most Sensitive Potential Use and Probability of Use: Parking Lot - 100%			
Are drinking water wells affected? <input checked="" type="radio"/> Yes <input checked="" type="radio"/> No	Aquifer Name: None		
Is surface water affected? <input checked="" type="radio"/> Yes <input checked="" type="radio"/> No	Nearest/Affected SW Name: None		
Off-Site Beneficial Use Impacts (Addresses/Locations): None			
Report(s) on file? <input checked="" type="radio"/> Yes <input checked="" type="radio"/> No	Where is report(s) filed? SFBRWQCB/ ACDEH		

AREA 3

TREATMENT AND DISPOSAL OF AFFECTED MATERIAL			
Material	Amount (Include Units)	Action (Treatment or Disposal w/Destination)	Date
Tank			
Piping			
Free Product	500 gals. (est.)	Disposal/Rollins Chempack	1991-1996
Soil			
Groundwater			
Barrels			

MAXIMUM DOCUMENTED POLLUTANT CONCENTRATIONS BEFORE AND AFTER CLEANUP									
POLLUTANT	Soil (ppm)		Water (ppm)		POLLUTANT	Soil (ppm)		Water (ppm)	
	Before	After	Before	After		Before	After	Before	After
TPH (Gas)			3.5		Xylene	< 2.5		1.3	
TPH (Diesel)	5900		15		Ethylbenzene	< 2.5		0.17	
Benzene	< 2.5		0.54		Oil & Grease				
Toluene	< 2.5		0.95		Heavy Metals ^{Pb}	32.1		0.012	
Other PCBs	2.8		0.033		Other				

Comments (Depth of Remediation, etc.):
 Remedial Actions taken included monthly removal of product from monitoring wells.

IV. CLOSURE

Does completed corrective action protect existing beneficial uses per the Regional Board Basin Plan? <input checked="" type="radio"/> Yes <input checked="" type="radio"/> No		
Does completed corrective action protect potential beneficial uses per the Regional Board Basin Plan? <input checked="" type="radio"/> Yes <input checked="" type="radio"/> No		
Does corrective action protect public health for current land use? <input checked="" type="radio"/> Yes <input checked="" type="radio"/> No		
Site Management Requirements: Do not create vertical conduits, deed restriction on groundwater usage, health and safety plans to be followed during any activities leading to soil and/or groundwater pollution exposure.		
Monitoring Wells Decommissioned: * <input checked="" type="radio"/> Yes <input checked="" type="radio"/> No	Number Decommissioned: 12	Number Retained: 0
List Enforcement Actions Taken: None		
List Enforcement Actions Rescinded: N/A		

* To be completed within 30-days from the date of closure letter.

V. TECHNICAL REPORTS, CORRESPONDENCE ETC., THAT THIS CLOSURE RECOMMENDATION WAS BASED UPON

Title:	Date:
Quarterly Groundwater Monitoring Reports (Dunn Corp., Rust E&I)	7/91-12/96
Subsurface Investigation Report (Dunn Corp.)	8/91
Subsurface Investigation Summary Report (Dunn Corp.)	6/92
Sitewide Risk Management Plan (Rust)	5/95

VI. ADDITIONAL COMMENTS, DATA, ETC.

PLEASE INCLUDE/ATTACH THE FOLLOWING AS APPROPRIATE:

- 1) SITE MAP INDICATING TANK PIT LOCATION, MONITORING WELL LOCATION, GROUNDWATER GRADIENT, ETC.; AND
- 2) SITE COMMENTS WORTHY OF NOTICE (E.G., AREA OF RESIDUAL POLLUTION LEFT IN PLACE, DEED NOTICES ETC.)

Continued from above

Letter report of additional wells inside Building 12(Dunn)	March 27, 1992
Remedial Workplan for Area 3. (Rust)	Feb, 1994
Area 3 Monitoring Results (Rust)	Oct, 1994
Soil Investigation and Soil Remediation Activities Report(Rust)	Feb, 1995
Letters Amending the SRMP	Sep, 1995
Baseline Health Risk Assessment (Soma Env. Engineering)	Jan, 1994
Safety Information and Contingency Plan (PES Env.)	Aug, 1995

Attached:

- Site Map
- Deed Restriction on groundwater use.

If land use changes, a revised risk evaluation may be needed as appropriate