

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



5597 OAKPORT ST,
OAKLAND, CA

RO# 838

RAFAT A. SHAHID, DIRECTOR

February 21, 1996

Ms. Eileen Fanelli
EBMUD Regulatory Compliance
P.O. Box 24055
Oakland CA 94623-4240

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

**Re: Subsurface Investigation Workplan for EBMUD Oakport Parcels,
Oakland CA 94621**

Dear Ms. Fanelli:

Our office has received and reviewed the following reports recently submitted:

- * Baseline Phase I Site Assessment, April 1995, EBMUD Oakport Parcels
- * Baseline Preliminary Soil Investigation, November 1995, EBMUD Oakport Site
- * Cambria Subsurface Investigation Workplan, EBMUD Oakport Parcels.

These reports give: a historical background on the above referenced sites, environmental status of neighboring sites, the results of initial soil sampling at the EBMUD sites and at an additional Port of Oakland parcel and a work plan to further delineate the contamination found on the EBMUD parcels.

Our office concurs that the initial soil investigation was appropriate to characterize the two EBMUD sites. There is no evidence of previous hazardous materials use on these sites which would warrant additional areas of investigation. In regards to the Cambria workplan, our office has the following comments:

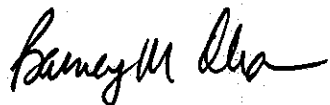
- * The approach to collect soil and grab groundwater samples radially from boring SB-4 is acceptable. It is also appropriate to run an initial tar sample for the analytes listed in the work plan ie TEPH for creosote and motor oil, POG (Petroleum Oil and Grease), PNA's, VOC's by method 8240, semi-volatiles by method 8270, PCB's and the metals cadmium, chromium, lead, nickel and zinc. Based on the results of your initial analyses, the soil and groundwater samples will be selectively analyzed for the analytes found in the tar sample. Keep in mind, the analytes detected in the prior soil samples must be analyzed in soil and groundwater samples ie POG, chromium, lead and nickel.

Ms. E. Fanelli
EBMUD Oakport Parcels
February 21, 1996
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* I understand that the analysis of PNA's and creosote in samples and the establishing of a correlation between the concentrations of one parameter to the other will not be done. Therefore, there will be no need to verify the number of data points necessary to generate this correlation.

Please notify our office prior to your field work. I may be reached at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: G. Jensen, Alameda County District Attorney's Office
Mr. D. Elias, Cambria Environmental Technology, Inc., 1144
Sixty-Fifth St., Suite C, Oakland, CA 94608
G. Coleman, files

EBMUDOak

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0838

July 19, 1994
StID#4875

Mr. Michael Wallis
EBMUD Director of Wastewater
375 11th St.
Oakland CA 94607

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 HARBOR BAY PARKWAY, 2ND FLOOR
ALAMEDA, CA 94502-6577

(510) 271-4530

**Re: Comment on July 1994 Groundwater Assessment Work Plan for
EBMUD Oakport Wet Weather Facility, 5597 Oakport St.,
Oakland 94621**

Dear Mr. Wallis:

Thank you for the submission of the above referenced work plan as provided by your consultant, Black and Veatch Waste Science, Inc. I have completed my review and have discussed our office's concerns with Cynthia Adkisson of your staff. In general, our office concurs with the work plan for the installation of three monitoring wells and this work may proceed as projected in the work plan, in September of 1994. Because of the eventual desire for closure, our office has the following concerns and observations of which we would request your reply:

1. It appears that the unknown 1000 gallon tank was only analyzed for an "open scan" 8240 analysis, i.e. the volatile organics were reported. Unfortunately, volatile fuel components other than BTEX would not have been reported in this analysis. Therefore, the other gasoline components and the higher boiling compounds such as diesel and motor oil would not be detected. Typically, for an unknown fuel tank, the Tri-Regional Board guidelines recommend the analysis for TPH as gasoline, as diesel and BTEX.
2. There is uncertainty as to the final disposition of excavated soils from the tank removals. In fact, it appears that no analysis was performed for these soils. Please attempt to determine these soils disposition.
3. Because of the existence of the catch basin, what if any affect on the gradient will this large structure have? Will this effect on gradient be incorporated in the investigation should contamination be found in monitoring well MW-1 ?
4. Please add TDS (Total Dissolved Solids) to your list of analytes for your wells. This may prove helpful to determine whether the groundwater beneath this site is of drinking water quality.

Mr. Michael Wallis
StID # 4875
EBMUD Wet Weather Facility
5597 Oakport
July 19, 1994
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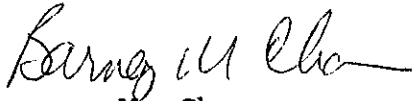
Lastly, please contact me at least **48 working hours** prior to any field work so I may arrange to be onsite if possible.

Please respond to these items in writing, prior to initiation of the work plan proposal. Please be aware that our office has recently moved to:

1131 Harbor Bay Parkway, Room 250, Alameda CA 94502.

If you have any questions you may contact me at (510) 337-2871.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: Cynthia Adkisson, EBMUD, P.O. Box 24055, Oakland CA
94623-1055

Anne Bowie, Black & Veatch Waste Science, Inc., 2300
Clayton Road, Suite 220, Concord, CA 94520-
2100

E. Howell, files

wp5597

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0838

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 5, 1994
StID # 4875

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

Ms. Cynthia Adkisson
EBMUD
P. O. Box 24055
Oakland CA 94623-1055

**Re: Comment on April 29, 1994 Letter Regarding Tank Removal
Investigation at 5597 Oakport St., Oakland 94621**

Dear Ms. Adkisson:

Our office has received and reviewed the above referenced letter and associated reports responding to my February 23, 1994 letter requesting technical reports. The issue is whether adequate investigation has occurred following the removal of underground tanks at the 5597 and 5601 Oakport addresses. EBMUD requests that the County waive any additional investigation and you enumerated the reasons why. Our office would like to respond to all points of your letter.

1. Our office acknowledges the extensive overexcavation was performed while constructing the Wet Weather facility. Certainly, with excavation depth to approximately fifteen feet, most of the petroleum affected soils have likely been removed beneath both tank areas. Our office is not currently requesting a soil investigation at this site. In regards to the excavated soil generated from the tank removals, was this soil ever characterized and what was the final disposition of this removed soil?
2. Our office acknowledges the low permeable soils associated with bay muds in this area. However, groundwater in this area is very shallow and the concentration of petroleum hydrocarbon in the grab water samples indicate that a hydrocarbon release had occurred with a high likelihood of impacting the groundwater.
3. Since you indicate that the District does not intend to sell this property, it may be appropriate to leave limited amounts of soil and/or groundwater contamination in place. This may be acceptable as long as the conditions of the RWQCB's Alternative Compliance Points is met. Keep in mind this approach requires the installation of compliance wells at the edge of the groundwater plume.

Ms. Cynthia Adkisson
StID # 4875
5597 Oakport St.
May 5, 1994
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4. In regards to the "apparent" signoff given by Mr. Ariu Levi of this office to Ms. Barbara Hagen of the District, I have discussed this with Mr. Levi. He stated that in order for the District to proceed with their construction efforts, no further excavation would be required given the reported analytical results. The "release" referred to in his conversation was a release from further excavation requirements, not one of further investigation. Had this been the case, written acknowledgement of no further work would have been issued.

Although the County did not have further correspondence requesting further investigation of this site until my February 23, 1994 letter, this does not relinquish the District from completing the corrective active requirements per Article 11, Chapter 16 of Title 23 California Code of Regulations. In addition, in accordance with Title 23, an Unauthorized Leak Report should be filled out for the release from the tank removals in July 1988. Please submit this report **within 10 days of receipt of this letter.**

Your explanation for the existence of an Unauthorized Leak Report (ULR) dated 7/1/87 is reasonable given the results of the tank removals performed in May of 1987. These two tanks are relatively close to those removed in July of 1988. Of particular interest in the Kapraelian report detailing the 5/87 tank removals is their recommendation section where they state "because of the presence of dissolved fuel constituents in the groundwater, we recommend the installation of a groundwater monitoring well system based on the Regional Water Quality Control Board Guidelines on fuel leaks."

You also state that the District is concerned about the retroactive application of guidelines and regulations and you also inquired about the legal requirements for groundwater monitoring wells during the time of removal activities in 1988. Please be advised that Alameda County was delegated the lead responsibility for fuel cases by the RWQCB on December 1988. Therefore, at the time of these tank removals the RWQCB was the lead agency and their guidelines were in effect. You are encouraged to contact the Water Board to find out what their specific requirements were at that time. It does appear that there were groundwater monitoring requirements guidelines at this time given the recommendation of Kapraelian mentioned above. In addition, the LUFT document was adopted in 1988 to address leaking fuel tanks.

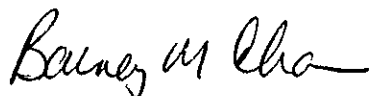
Ms. Cynthia Adkisson
StID # 4875
5597 Oakport St.
May 5, 1994
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We trust that this letter adequately addresses the District's concerns. We also request that the District submit a plan and schedule for future groundwater investigation **within 30 days or by June 7, 1994.**

You are reminded this is a formal request for technical reports pursuant to the California Water Code Section 13267 (b).

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
Michael Wallis, EBMUD Director of Wastewater, 375 11th St.,
Oakland, CA 94607

A. Levi, ACEH
E. Howell, files

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0838

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

February 23, 1994
StID # 4875

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

Mr. Michael Wallace
EBMUD Director of Wastewater
375 11th St.
Oakland CA 94607

**Re: Request for Technical Reports for Groundwater Investigation
at 5597 Oakport St., Oakland CA 94621**

Dear Mr. Wallace:

Our office has reviewed documents from EBMUD regarding the removal of three underground storage tanks from the above site on July 8, 1988. These documents were sent to our office by Mr. Walter Bishop. Specifically, a waste oil, diesel and gasoline tank were removed with the approximate size of 2000, 2000 and 8000 gallon respectively. The analytical results of soil and groundwater samples taken indicate that there had been a release of gasoline and diesel to the groundwater beneath their respective tanks. The soil samples did not detect any hydrocarbons. As high as 30 mg/l diesel and 8.8 mg/l gasoline and 3 mg/l xylenes were detected in the grab water samples from the excavation pit.

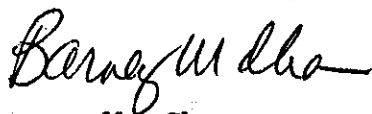
Because of these results, this site is considered to have experienced an unauthorized release of petroleum hydrocarbons, the extent of which must be determined and potentially remediated. In fact, the January 1992 Water Board's list of sites affected by releases from underground storage tanks lists an EBMUD site on Oakport reporting a diesel release on 7/1/87. Perhaps the reported site and this one is one in the same. Please determine why an unauthorized release was noted on this date and describe how the release was remediated. In regards to the data of the July 1988 tank removals, I have enclosed a blank Unauthorized Release Form (URF) for you to complete and return to our office. You are also requested to submit any reports which detail any steps taken to investigate the gasoline and diesel release previously described. At this time, it appears that a groundwater investigation will be required. If your investigation does not resolve the hydrocarbon release, you should submit a work plan which calls for the installation of monitoring wells.

Mr. Michael Wallace
StID # 4875
5597 Oakport St.
February 23, 1994
Page 2.

Please submit the requested documents to our office within 45 days or by April 6, 1994.

This should be considered a formal request for technical reports pursuant to the California Water Code, Section 13267 (b). You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
E. Howell, files

wp-5597