

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RO#856

Alameda County CC4380  
Environmental Health Services  
1131 Harbor Bay Pkwy., #250  
Alameda CA 94502-6577  
(510)567-6700 FAX(510)337-9335

April 25, 1996  
STID# 1668

Ms. Lydia Lau  
Civic Bank of Commerce  
2101 Webster Street, 14th Floor  
Oakland, California 94612-3043

**RE: Status of the Case Closure for the former Guiton Bus Line  
3421 Hollis Street, Oakland, CA 94608**

Dear Ms. Lau:

Per your request, this letter documents the status of the case closure for the five underground storage tanks (USTs) removed at the above referenced site on December 18, 1989. Based on the data submitted for the site, it appears that no further work is required regarding the five USTs. Therefore, this office is recommending case closure to Mr. Kevin Graves of the San Francisco Bay Regional Water Quality Control Board (RWQCB).

The case closure summary for the subject site is being forwarded to the RWQCB for sign off. The RWQCB has thirty (30) days to concur with our recommendation. Our experience with the RWQCB is very positive in that they respond within the 30 days period and approve the case closure recommendation by this agency.

Please contact me at (510) 567-6780 if you have any questions concerning this letter.

Sincerely,

Susan L. Hugo  
Senior Hazardous Materials Specialist

cc: Mee Ling Tung, Director, Environmental Health  
Gordon Coleman, Acting Chief, Environmental Protection Division  
Kevin Graves, San Francisco Bay RWQCB  
Eric Schmier, Orbit Property Co., 1475 Powell Street # 201  
Emeryville, California 94608

Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0856

April 30, 1991

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

Mr. Mark Lee  
Orbit Property Company  
1475 Powell St., Suite 201  
Emeryville, CA 94608

Re: Chips groundwater and soils analytical report, 3421 Hollis St.,  
Oakland

Dear Mr. Lee:

The Alameda County Department of Environmental Health, Hazardous Materials Division has reviewed the above report, as well as your cover letter on the above site. Fundamentally, we disagree with the characterization of 68 ppm diesel as a "relatively low level" of groundwater contamination. This result and the others recorded in groundwater in the series of hydropunch points indicate levels of concern that must be properly monitored, and possibly remediated.

The Chips report states that due to slow recharge into the hydropunch borings, "water level measurements in [the hydropunch locations] were uncertain and variable." Therefore, the indicated groundwater flow directions are suspect. In addition, slow-flow groundwater conditions under a shallow hydraulic gradient in clayey soils can create conditions for cross-gradient and sometimes slight up-gradient movement of dissolved contaminants. These factors could explain the contamination found in hydropunch points 1 and 6. In any case, we need much better information on flow characteristics under the site.

Information from the hydropunch survey indicates that one monitoring well will not be sufficient. The purpose of monitoring is not only to locate the points of greatest groundwater degradation, but also to define the limits of contaminant plumes, including the downgradient "zero edge" of hydrocarbons. Given that hydropunch points 1, 2, 4, and 6 show hydrocarbon contamination, one permanent monitoring well cannot by itself achieve these objectives.

Therefore, Orbit Property Co. must prepare an **amended work plan** for the site, which is due in this office and to the Regional Water Quality Control Board no later than **May 31, 1991**. It must be signed by a California-registered geologist, engineering geologist, or professional engineer with expertise in groundwater investigations. The work plan must also include a specific schedule for the installation, development, and regular sampling of wells for the remainder of 1991. The May 31 deadline is firm; all subsequent technical reports are to be submitted to this office and to the Water Board within six weeks of completion of field work. The Chips report

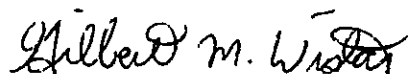
Mr. Mark Lee  
April 30, 1991  
Page 2 of 2

on the hydropunch survey is dated December 1990, yet our office did not receive it until late April, a delay of four months.

Because we are overseeing this site under the designated authority of the Water Board, this letter constitutes a formal request for technical reports, per Sec. 13267(b) of the California Water Code. Failure to respond by the May 31 deadline could result in enforcement referral of this case to the Water Board, which can levy fines of \$1,000 per day. In addition, Orbit Property could be cited for improper closure of underground tanks under Sec. 25298 of the California Health and Safety Code. The Alameda County District Attorney's Office has jurisdiction over such filings.

If you have any questions about this letter, please contact the undersigned at 271-4320.

Sincerely,



Gil Wistar  
Hazardous Materials Specialist

cc: Lester Feldman, RWQCB  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Rafat A. Shahid, Asst. Agency Director, Environmental Health  
files





Certified mailer # P 062 127 878

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

July 26, 1990

Mr. Eddy Orton  
Orbit Property Corp.  
1475 Powell St., Suite 201  
Emeryville, CA 94608

**NOTICE OF VIOLATION**

Dear Mr. Orton:

As indicated to you in a letter from this office dated April 4, 1990, we received a report with a cover letter from Orbit Property last March regarding the former Guiton Bus Lines yard at 3421 Hollis St. in Oakland. In our letter, we stated that your report was deficient in a number of respects as a work plan for a preliminary assessment. (Preliminary work plan requirements were addressed in the Division's letter to you dated February 15, 1990.) This office established a deadline of April 30, 1990 for submittal of a suitable work plan to address soil and groundwater contamination at this site. However, as of the date of this letter, we have not received these materials.

Therefore, Orbit Property Co. is in violation of Sec. 25298 of the California Health and Safety Code (H&SC), concerning the full definition and remediation of contamination resulting from underground tank systems. In addition, Orbit Property Co. is in violation of Sec. 29299.37 H&SC, regarding the failure to submit technical reports to the local administering agency. You are directed to submit a work plan to this office prepared according to this office's February 15, 1990 letter to you; this work plan is due here and to the Regional Water Quality Control Board in Oakland by **August 13, 1990**. As a reminder, your March 28 report was deficient in the following areas.

**A. Soils Investigation:**

1. [x] Description of field soil sampling methodology.
2. [x] Chemical Methods to be used for sample preparation and analysis (method numbers and references).
3. [x] Drilling Logs.

Mr. Eddy Orton  
July 26, 1990  
Page 2 of 3

#### B. Groundwater

1. [x] Background assessment: cause & location, pollutants, site history, etc.
2. [x] Groundwater monitoring well design, locations, installation, and development.
3. [x] Groundwater sampling methodology.
4. [x] Method used to measure free-product thickness.
5. [x] Method used to measure groundwater elevations.
6. [x] Lateral definition of groundwater contamination.
7. [x] Local and regional hydrogeology:  
Groundwater sensitivity, site specific geology, hydrogeologic setting, nearby surface water descriptions, potential pollutant pathways, hydraulic connections, local gradient evaluation, seasonal fluctuations, aquifer characteristics, soil permeability.
8. [x] Groundwater beneficial uses:  
Existing beneficial uses, potential beneficial uses, well surveys (municipal, agricultural, domestic), long term fate of contaminants.

#### C. Other Elements

1. [x] Signature of report by registered engineer or professional (Sections 6735, 7835, 7835.1 of Business & Professional Code; Rule 415 of Professional and Vocational Regulations.).
2. [x] Curriculum vitae and qualifications for persons involved in the project.

As indicated above, your revised work plan must be prepared and signed by a Registered Geologist or Engineering Geologist certified in the state of California. Because we are overseeing this site under the designated authority of the RWQCB, this letter constitutes a formal request for technical reports, per Sec. 13267(b) of the California Water Code. Failure to respond in a timely manner could result in civil liabilities under the Water

Mr. Eddy Orton  
July 26, 1990  
Page 3 of 3

Code of up to \$1,000 per day. Other violations of California law, as outlined above, can also be cited.

If you have any questions about this matter, please contact the undersigned at 271-4320.

Sincerely,

*Gilbert M. Wistar*

Gil Wistar  
Hazardous Materials Specialist

cc: Howard Hatayama, DOHS  
Lester Feldman, RWQCB  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Rafat A. Shahid, Asst. Agency Director, Environmental Health  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0856

April 4, 1990

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

Mr. Eddy Orton  
Orbit Property Corp.  
1475 Powell St., Suite 201  
Emeryville, CA 94608

RE: Report submitted for contamination at 3421 Hollis St.,  
Oakland

Dear Mr. Orton:

We have received your report with a cover letter dated March 28, 1990. We cannot complete our review of this report or of any other materials submitted, since the following items are missing or have not been addresses as requested in the Division letter to you dated February 15, 1990.

**A. Administrative:**

1.  We have not received a deposit for reviewing the report. A deposit of \_\_\_\_\_ is required. Please make checks payable to Alameda County.
2.  We have exhausted your deposit account. Please send a deposit of \_\_\_\_ to cover costs of remediation oversight.
3.  Other:

**B. Soils Investigation:**

1.  Description of field soil sampling methodology.
2.  Chemical Methods to be used for sample preparation and analysis (method numbers and references).
3.  Drilling Logs.
4.  Copies of original, signed laboratory reports.
5.  Detection limits for all parameters analyzed.
6.  Site map.

**C. Groundwater**

1.  Background assessment: cause & location, pollutants, site history, etc.

2.  Groundwater monitoring well design, locations, installation, and development.
3.  Groundwater sampling methodology.
4.  Certified Laboratory and DHS Certified number, chain of custody procedures, sample preservation methods, holding times, etc.
5.  Method used to measure free product thickness.
6.  Method used to measure groundwater elevations.
7.  Vertical and lateral definition of soil contamination.
8.  Local and regional hydrogeology:  

Groundwater sensitivity, site specific geology, hydrogeologic setting, nearby surface water descriptions, potential pollutant pathways, hydraulic connections, local gradient evaluation, seasonal fluctuations, aquifer characteristics, soil permeability.
9.  Groundwater cross-section graphics, gradient maps.
10.  Groundwater beneficial uses:  

Existing beneficial uses, potential beneficial uses, well surveys (municipal, agricultural, domestic), long term fate of contaminants.
11.  Remediation Activities:  

Rationale, soil remediation method and effectiveness, groundwater remediation method and effectiveness, impact on beneficial uses.
12.  Remediation Completion:  

Final clean-up levels sought, monitoring program verification criteria (frequency, duration, statistical methods), impact of residual pollutants on beneficial uses.

#### D. Site Safety Plan

1.  Elements of Site Safety Plan as specified by 29 CFR 1910.120 (See attached).
2.  Other.

#### E. Other

1.  Reports referred to in your plan have not been supplied to this office.



2. [ ] Reference list to the reports cited in document.
3. [ ] Data format: correlation of lab sample numbers, drilling log sample numbers, cross references, incomplete tables, etc.
4. [ ] Primary contact person for project.
5. [ ] Name and address of organization or persons funding this report.
6. [ ] DHS Laboratory Certification Number.
7. [ ] Statement from certified laboratory that analytical methods used in this report have been certified by DHS.
8. [ ] Quality control and assurance data regarding the analytical information submitted.
9. [x] Signature of report by registered engineer or professional (Sections 6735, 7835, 7835.1 of Business & Professional Code; Rule 415 of Professional and Vocational Regulations.).
10. [x] Curriculum vitae for persons involved in project.
11. [ ] Other.

You are directed to submit a revised work plan that addresses all of the items included in the attachment to this office's February 15 letter to you, and particularly the items marked above. This work plan must be prepared and signed by a Registered Geologist or Engineering Geologist certified in the state of California. This work plan is due in our office no later than April 30, 1990.

If you have any questions on this matter, please contact the undersigned at 271-4320.

Sincerely,

*Gilbert M. Wistar*

Gil Wistar  
Hazardous Materials Specialist

cc: Howard Hatayama, DOHS  
Lester Feldman, RWQCB  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Rafat A. Shahid, Asst. Agency Director, Environmental Health  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0856

RAFAT A. SHAHID, Assistant Agency Director

February 15, 1990

DEPT. OF ENVIRONMENTAL HLTH  
HAZARDOUS MATERIALS PROG.  
80 SWAN WAY, SUITE 200  
OAKLAND, CA 94621  
430-4530

Mr. Eddy Orton  
Orton Development, Inc.  
1475 Powell St., Suite 207  
Emeryville, CA 94608

**Re: Unauthorized release(s) from underground storage tanks, 3421  
Hollis St., Oakland**

Dear Mr. Orton:

As you know, on December 18, 1989, the Alameda County Department of Environmental Health, Hazardous Materials Division witnessed the removal of five underground storage tanks from the above location. Analytical results of two soil samples and one water sample taken from the tank pit indicate hydrocarbon levels above thresholds that the Regional Water Quality Control Board (RWQCB) considers to be evidence of unauthorized releases requiring further investigation. Title 23 of the California Code of Regulations requires all such unauthorized releases from underground tanks to be reported. An unauthorized release report therefore must be filed with this office within five days of receipt of this letter; you must also initiate further investigation and/or cleanup activities at this site, as outlined below.

This office will be the lead agency overseeing environmental investigation and cleanup activities at the site. The RWQCB is currently unable to manage the large number of fuel leak cases within Alameda County, and has therefore delegated this authority to our office. However, you must keep the Water Board apprised of all actions taken to characterize and remediate contamination at this site, because the Board retains the ultimate responsibility for ensuring protection of waters of the state.

As a first step in the environmental investigation, you must conduct a preliminary assessment to determine the extent of soil and groundwater contamination that has resulted from the leaking tank system. The information gathered by this investigation will be used to assess the need for additional actions at the site. The preliminary assessment should be designed to provide all of the information in the format shown in the attachment at the end of this letter, which is based on RWQCB guidelines. You should be prepared to install one monitoring well, if you can verify the direction of groundwater flow in the immediate vicinity of the site, and three wells if you cannot.

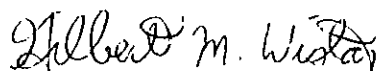
Mr. Eddy Orton  
February 15, 1990  
Page 2 of 2

Until the site is clean, you will need to submit reports to this office and to the RWQCB every three months (or at a more frequent interval, if specified at any time by either agency). These reports must include information pertaining to further investigative results; the methods and costs of cleanup actions implemented to date; and the method and location of disposal of any contaminated material.

Soils contaminated at hazardous waste concentrations (above 1,000 ppm hydrocarbons) should be transported by a licensed hazardous waste hauler and disposed of or treated at a facility approved by the California Department of Health Services. Soils contaminated below the hazardous waste threshold may be managed as nonhazardous, but are still subject to the RWQCB's waste discharge requirements. You have stated that you intend to bioremediate the soils remaining on-site; the specific plan for bioremediation, including timelines and sampling schedules and procedures, must be included in the work plan submitted to this office.

Your work plan, which in addition to the above should address each element of the attached guidelines, is to be submitted to this office by **March 23, 1990**. Copies of the proposal should also be sent to the RWQCB (attention: Lester Feldman). Because we are overseeing this site under the designated authority of the Water Board, this letter constitutes a formal request for technical reports, per Sec. 13267(b) of the California Water Code. Failure to respond in a timely manner could result in civil liabilities under the Water Code of up to \$1,000 per day. Other violations of California law may also be cited. If you have any questions about this letter or about remediation requirements established by the RWQCB, please contact the undersigned at 271-4320.

Sincerely,



Gil Wistar  
Hazardous Materials Specialist

enclosure

cc: Al Ridley, Woodward-Clyde Consultants (500 12th St., Suite 100,  
Oakland, CA 94607-4014)  
Howard Hatayama, DOHS  
Lester Feldman, San Francisco Bay RWQCB  
Gil Jensen, District Attorney, Alameda County Consumer and  
Environmental Protection Division  
Rafat Shahid, Asst. Agency Director, Environmental Health  
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