

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0908

April 26, 1993
StID # 4369

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. Charles Chamness
FAA-AWP-464.10a
P.O. Box 92007-WWPC
Los Angeles, CA 90009

**Re: Comment on February 4, 1993 Quarterly Monitoring Report for
FAA Oakland Airport ALS #2 Facility, Oakland CA 94621**

Dear Mr. Chamness:

Our office has received and reviewed the above referenced quarterly monitoring report for the above site as provided by Advanced Sciences, Inc. Recall, this report details the installation of three monitoring wells and the analysis of three groundwater samples from these wells in addition to a grab water sample from the pit. Our office has the following concerns regarding this site:

1. As mentioned in my November 10, 1993 letter, we have yet to receive a complete tank closure report with its appropriate contents.
2. Our office is not aware that soil borings, one per every ten feet of fuel line, has been collected as stated in the December 18, 1992 letter from ASI. This letter also mentioned the overexcavation and confirmatory sampling around the tank pit. We are also unaware of the status of this action. Be reminded, our office should be contacted 48 working hours in advance so we may witness such activities.
3. Our office has yet to receive a completed Unauthorized Release Report as requested in my November 10, 1992 letter. Please note that Title 23, Section 2652 (c) states that within 5 working days of detecting an unauthorized release, the owner or operator shall submit the the local agency a full written report which consists of the contents of an Unathorized Release Report.
4. Our office recognizes that we did not provide written response to the proposed work included in the June 8, 1992 ASI letter therefore you could implement said work within 60 days of submittal in accordance to Title 23, Article 11, Section 2726 (c). However, the Site Investigation (Phase I) section of the work plan stated that approximately five soil borings would be advanced around the former tank pit and soil samples taken at approximately 2,4 and 6 feet depth. Three of the boreholes would then be converted into monitoring wells. Not only were five

C. Chamness
StID # 4369
Oakland Airport ALS #2
April 26, 1993
Page 2.

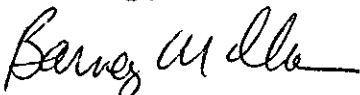
borings not advanced but apparently no soil samples were taken from the three borings converted into monitoring wells and analyzed. If you intended to perform the work proposed without any consultation or approval from our office, I would expect you to follow that which was proposed in your letter. You should be aware that the Tri-Regional Board Guidelines requires the sampling of all borings and monitoring wells every five feet or change in lithology. For construction of the monitoring well within 10 feet of the contaminant source, all samples collected are to be analyzed in the laboratory. For soil samples from the other monitoring wells, field screening is allowed.

5. There is question as to what occurred with the stockpiled soils from the tank excavation. In the inspection report of Ms. Susan Hugo, Alameda County inspector, it states that "clean fill" must be used to refill the tank pit, however on several occasions ASI states that stockpiled soils with TPH of 1100 parts per million was returned to the excavation. Please clarify this apparent ambiguity.

Please provide a written comment to the above items to our office within 30 days or by May 16, 1993.

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
R. Hiett, RWQCB
S. Battelle, ASI, 4909 Murphy Canyon Road, Suite 500, San Diego, CA 92123-4301
E. Howell, files

WP-ALS#2

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



MO1A, FAA ALSF# 2
1 Airport Dr, Oakland

R0908

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

November 10, 1992
STID # 4369

Mr. Charles Chamness
FAA-AWP-464.10a
P.O. Box 92007-WWPC
Los Angeles, CA 90009

Re: Subsurface Investigation at FAA Oakland International Airport
at ALS #2 Facility, Oakland CA 94621

Dear Mr. Chamness:

This site is another one being overseen by the Local Oversight Program and your contact is the undersigned Hazardous Materials Specialist. Our office has received the October 5, 1992 report prepared by Advanced Sciences, Inc. (ASI) regarding the site remediation at the above location. Recall, at this site a 2000 gallon diesel tank was removed on April 14, 1992. It was apparent at the time of the removal that there had been a release to the groundwater. This is confirmed in this report with 22 parts per million (ppm) of Total Petroleum Hydrocarbons (TPH) found in the groundwater sample.

Upon review of this report this office has the following concerns which we would like written comment to:

1. Our office has yet to receive a formal tank closure report. In fact this October 5, 1992 report is the only report on this site which we have received. Please provide a closure report which minimally includes: copies of the manifest for the disposal of the underground tank, a site map showing the locations where all samples were collected, chain of custody document for all samples taken, signed analytical reports for all results and copies of all non-manifested waste hauled off-site.
2. Our office is aware of the installation of three monitoring wells at this site, AW-1 through Aw-3. Please provide the report detailing the installation of these wells including analytical results of all borings and water samples, boring logs and gradient contour maps.
3. It was noted from the Site Plan that abandoned fuel lines were left in place. Please describe what actions were done to insure that there had not been any releases from the piping run.

Mr. Charles Chamness
STID # 4369
FAA- ALS Facility
November 10, 1992
Page 2.

4. The Oct. 5, 1992 report states that overexcavation and confirmation sampling will be done. From the results of the sidewall samples taken at the time of the tank removal it appears that the lateral migration of fuel has already been defined. Please state your logic for this action.

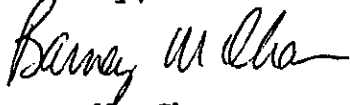
5. Please complete and return to this office the enclosed Unauthorized Release Report.

6. Be aware that you must continue monitoring the wells at this site on a quarterly basis at a minimum until the site is recommended for sign-off to the RWQCB.

Please provide a written response to our office to these items **within 30 days** of receipt of this letter.

You may contact me at 9510) 271-4350 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiatt, RWQCB
L. Sinfield, ASI, 4909 Murphy Canyon Rd., Suite 500
San Diego, CA 92123-4301
N. Werner, Port of Oakland, 530 Water St., Oakland 94604
E. Howell, files

ALS-FAA