

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0922

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

June 22, 1994

Mr. Mark Welling
Gallagher & Burk, Inc.
P.O. Box 7227
Oakland, CA 94601

STID 4025

Re: Work plan for Gallagher & Burke site, located at 7100
Mountain Blvd., Oakland, California

Dear Mr. Welling,

This office has reviewed Blymyer Engineer's work plan, dated June 17, 1994, and the addendum to the work plan, dated June 20, 1994. The work plan is acceptable to this office, **except for the proposal to leave 5 parts per million (ppm) benzene, toluene, ethylbenzene, and xylenes (BTEX) and 100 ppm Total Petroleum Hydrocarbons (TPH) in place.** Efforts must be made to remove all contaminated soil. If residual levels still remain after the overexcavation of the maintenance pit, then further remediation or possibly a **Risk Assessment**, assuring that these residuals will not pose a threat to human health or the ground water, will be required.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Craig Drizin
Blymyer Engineers, Inc.
1829 Clement Ave.
Alameda, CA 94501-1395

Edgar Howell-File(JS)

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March 8, 1994

Mr. Mark Welling
Gallagher & Burk, Inc.
P.O. Box 7227
Oakland, CA 94601

STID 4025

Re: Investigations at 7100 Mountain Blvd., Oakland, California

Dear Mr. Welling,

This office has received and reviewed Blymyer Engineer's Quarterly Ground water Monitoring Report, dated February 11, 1994. This report states that, per an August 4, 1993 letter, the County requested Gallagher & Burk to conduct three quarters of ground water monitoring at the site. However, to clarify this statement, the County stated that at least three additional quarters of ground water monitoring were required. A minimum of four quarters of ground water monitoring is required by the Regional Water Quality Control Board's (RWQCB) guidelines. In the case of this site, additional ground water monitoring may be required due to the possibility that contaminated soil or ground water has been left in place around the area of the maintenance pit.

Contaminated water was identified from the tank pit during the tank removal in October 1992. During further excavation of the pit in August 1993, greater amounts of water, which may have been contaminated, was noted to have entered the pit. Blymyer Engineers stated that this water appeared to be coming from the Maintenance Pit structure, and did not appear to be hydraulically connected to the aquifer beneath the site. It is unclear to this office whether the water around the Maintenance Pit is in direct contact with soil or whether it is contained within a structure, such as concrete. It appears more likely, however, that this water is in contact with soil, and therefore, has the potential for eventually migrating down to the water table, initially observed at 25 feet below ground surface. Additionally, if this water is in contact with soil, the potential exists for this soil to have been contaminated by the water also. For example, during the overexcavation activities, up to 23,000 parts per million (ppm) of Total Recoverable Petroleum Hydrocarbons (TRPH) was identified from a soil sample collected from the east wall of the excavation.

Mr. Mark Welling
Re: 7100 Mountain Blvd.
March 8, 1994
Page 2 of 2

Additional information and characterization is required for the construction of the Maintenance Pit and the soil and water within the Maintenance Pit area. If soil and water contamination does still exist near this pit area, further investigations will be necessary to determine whether this contamination will ever pose a threat to ground water, and remedial efforts may be required. Lastly, quarterly ground water investigations will have to continue until this site qualifies for RWQCB "sign-off".

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,


Juliet Shin
Hazardous Materials Specialist

cc: Craig Drizin
Blymyer Engineers, Inc.
1829 Clement Avenue
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RO922

August 4, 1993

Mr. Mark Welling
Gallagher & Burk, Inc.
P.O. Box 7227
Oakland, CA 94601

STID 4025

Re: Investigations at 7100 Mountain Blvd., Oakland, California

Dear Mr. Welling,

This office has received and reviewed Blymyer Engineer's Preliminary Site Assessment, dated July 20, 1993, for the above site. You are required to conduct a minimum of three additional quarterly ground water monitoring events at the site. Ground water samples shall continue to be analyzed for all waste oil constituents.

Additionally, you will be required to address the soil contamination remaining at the site. Blymyer Engineers has recommended that the remainder of contaminated soil be excavated and disposed of off site. This recommendation is acceptable to this office. It is the understanding of this office that this work will be conducted on August 10, 1993. A County representative is required to be present during confirmation sampling.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Craig Drizin
Blymyer Engineers, Inc.
1829 Clement Avenue
Alameda, CA 94501-1395

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(510) 271-4530

March 10, 1993

Mr. Mark Welling
Gallagher & Burk, Inc.
P.O. Box 7227
Oakland, CA 94601

STID 4025

Re: Work plan for a Preliminary Site Assessment at 7100
Mountain Blvd., Oakland, California

Dear Mr. Welling,

This office has received and reviewed Blymyer Engineer's work plan, dated March 3, 1993. Contrary to the proposals in the work plan, this office feels that three monitoring wells will be necessary at the site to determine the ground water gradient and to better characterize the geology beneath the site.

The ground water gradient direction at the site is very uncertain. Although Blymyer Engineers estimated that the ground water is flowing in the downhill direction, this is far from being certain considering the series of folding and faulting of deposits that has occurred in this area. Additionally, because of the complex geology out at the site, this office feels that three wells would be required to better characterize this geology and all the potential migration pathways of any past releases from the waste oil underground storage tank.

Per a conversation between Craig Drizin, Blymyer Engineers, and myself on March 10, 1993, if no ground water is encountered in the well boring, placed within 10 feet of the former tank, down to 50 feet below ground surface, and there is no indications of any fractures or cracks that might have acted as a conduit for past releases, than no monitoring wells will be required. It is the understanding of this office that soil samples or "rock chips" will be collected at 10-foot intervals and changes in lithology from the borings. A minimum of two soil samples will be required to be analyzed from each boring for the waste oil constituents cited in Table 2 of RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Storage Tanks.

Mr. Mark Welling
Re: 7100 Mountain Blvd.
March 10, 1993
Page 2 of 2

Additionally, it appears that since the removal of the waste oil tank, no efforts were made to overexcavate the elevated concentrations of oil and grease, diesel, and gasoline identified in the soil from the tank pit. Please be reminded that you will need to address the remediation of this soil and confirm that this contaminated soil has been removed.

Please submit an addendum to the work plan with a figure indicating where the additional two monitoring wells will be placed. If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,



Juliet Shin
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Craig Drizin
Blymyer Engineers, Inc.
1829 Clement Avenue
Alameda, CA 94501-1395

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December 23, 1992

Mr. Mark Welling
Gallagher & Burk, Inc.
P.O. Box 7227
Oakland, CA 94601

STID 4025

RE: Required investigations at 7100 Mountain Blvd., Oakland,
California

Dear Mr. Welling,

The case files for the above site have been transferred to another Hazardous Materials Specialist, Juliet Shin.

On October 2, 1992, one waste oil underground storage tank (UST) was removed from the site. Discoloration of the soil was observed on the eastern wall of the tank pit. Two soil samples were collected from the sidewalls of the tank pit, one soil sample was collected from the stockpiled soil, and one ground water sample was collected from the tank pit. The analysis of these samples identified up to 1,200 parts per million (ppm) Oil and Grease and 1,800 ppm Total Petroleum Hydrocarbons as diesel (TPHd) in the sidewall soil samples and 6,600 parts per billion (ppb) Oil and Grease and 5,500 ppb TPHd in the groundwater sample.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) requires that a soil and ground water investigation be conducted when there is evidence to indicate that a release to soil and ground water has occurred from the UST.

You are required to conduct a **Preliminary Site Assessment (PSA)** to determine the lateral and vertical extent and severity of latent soil and ground water contamination which may have resulted from the release at the site. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, the State Water Board's LUFT Manual, and be consistent with requirements set forth in Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached **Appendix A**. The major elements of the guidelines include, but are not limited to, the following:

Mr. Mark Welling
RE: 7100 Mountain Blvd.
December 23, 1992
Page 2 of 4

- o At least one ground water monitoring well must be installed within 10 feet of the observed soil contamination, oriented in the confirmed downgradient direction relative to ground water flow. In the absence of data identifying the confirmed downgradient direction, a minimum of three wells will be required to verify gradient direction. During the installation of these wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology.
- o Subsequent to the installation of the monitoring wells, these wells must be surveyed to an established benchmark, with an accuracy of 0.01 foot. Ground water samples are to be collected and analyzed quarterly, along with water level measurements. If the initial quarterly reports indicate that ground water flow directions vary greatly than you will be required to begin monthly water level measurements until the ground water gradient behavior is known. Both soil and ground water samples must be analyzed for the appropriate fuel contaminants listed in Table 2 of the RWQCB's Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks.

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. The RWQCB may choose to take over as lead agency if it is determined, following the completion of the initial assessment, that there has been a substantial impact to ground water.

The PSA proposal is due within 45 days of the receipt of this letter. Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for final RWQCB "sign-off". Such quarterly reports are due the first day of the second month of each subsequent quarter.

The referenced initial and quarterly reports must describe the status of the investigation and must include, among others, the following elements:

Mr. Mark Welling
RE: 7100 Mountain Blvd.
December 23, 1992
Page 3 of 4

- o Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- o Status of ground water contamination characterization.
- o Interpretations of results: water level contour maps showing gradients, free and dissolved product, plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations or plans for additional investigative work or remediation.

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 RWQCB.

Please be reminded to copy Richard Hiatt, at the San Francisco Bay Region-Water Quality Control Board, on all correspondence and reports regarding this site.

This office has enclosed an Unauthorized Leak/Release form. Please complete this form and submit it to this office within 45 days of the receipt of this letter.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,



Juliet Shin
Hazardous Materials Specialist

cc: Richard Hiatt, RWQCB

Mr. Mark Welling
RE: 7100 Mountain Blvd.
December 23, 1992
Page 4 of 4

Michael S. Lewis
Blymyer Engineers, Inc.
1829 Clement Avenue
Alameda, CA 94501-1395

Edgar Howell-File(JS)