

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO#949

ARNOLD PERKINS, DIRECTOR
RAFAT A. SHAHID, DEPUTY DIRECTOR

January 12, 1996

STID 2428

Alameda County Environmental Health Dept.
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577
(510)567-6700 fax: (510)337-9335

John C. Whalen
560 Gerard Court
Pleasanton, CA 94566

RE: WHALEN PROPERTY, 4227 PLEASANTON AVENUE, PLEASANTON

Dear Mr. Whalen:

As you are aware, this office, along with staff from the San Francisco Bay Regional Water Quality Control Board (RWQCB), have completed review of the various environmental investigation and remediation projects performed at the subject Pleasanton site in preparation for planned single-family development. Noteworthy attention was focused upon, among others, the following: 1) former underground storage tanks (UST), 2) former above ground storage tanks, 3) tire changing area, 4) steam cleaning area, and 5) the former Alameda County Mosquito Abatement District facility. Specific "case closure" letters have been issued for both the UST and Mosquito Abatement District projects.

Based solely on information presented to this agency, and with the provision that such information was accurate and representative of site conditions, no further action related to the subject projects is required, except where otherwise indicated in project-specific closure letters, to allow unconditional development of the subject property.

Should you have any questions, you may contact the undersigned at (510) 567-6783.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Jun Makishima, Acting Director
Tom Peacock, ACDEH LOP
Ravi Arulanantham, RWQCB
Kevin Graves, RWQCB
Greg Plucker, Pleasanton Planning Department
William Halvorsen, Pleasanton Fire Department
Thomas Mershel, New Cities Development Group

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 949

ARNOLD PERKINS, DIRECTOR
RAFAT A. SHAHID, DEPUTY DIRECTOR

January 12, 1996

Alameda County Environmental Health Dept.
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577
(510)567-6700 fax: (510)337-9335

STID 2428

John Rusmisl
Alameda County Mosquito Abatement District
23187 Connecticut Street
Hayward, CA 94545

RE: (FORMER) ALAMEDA COUNTY MOSQUITO ABATEMENT DISTRICT
FACILITY, WHALEN PROPERTY, 4227 PLEASANTON AVENUE (715 ST.
JOHN STREET), PLEASANTON - DDT REMEDIATION PROJECT

Dear Mr. Rusmisl:

As we discussed previously, since the beginning of 1996 I have expended 8.2 hours on the referenced project. The current rate charged by this office for such technical oversight is \$90 per hour. Please remit a check to my attention payable to Alameda County for the sum of \$738. Thank you for your attention to this matter.

Please call me at 510/567-6783 should you have any questions.

Sincerely,

Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Jun Makishima, Acting Director
Tom Peacock, ACDEH LOP

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#949

ARNOLD PERKINS, DIRECTOR
RAFAT A. SHAHID, DEPUTY DIRECTOR

January 12, 1996

Alameda County Environmental Health Dept.
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577
(510)567-6700 fax: (510)337-9335

STID 2428

John Rusmisl
Alameda County Mosquito Abatement District
23187 Connecticut Street
Hayward, CA 94545

RE: (FORMER) ALAMEDA COUNTY MOSQUITO ABATEMENT DISTRICT
FACILITY, WHALEN PROPERTY, 4227 PLEASANTON AVENUE (715 ST.
JOHN STREET), PLEASANTON - DDT REMEDIATION PROJECT

Dear Mr. Rusmisl:

Staff from this office and that of the California Regional Water Quality Control Board, San Francisco Bay Region (RWQCB), have completed review of technical reports submitted on behalf of the Alameda County Mosquito Abatement District ("District") by Dames & Moore, up to and including the January 1996 *Site Investigation and Remediation Activities* and January 10, 1996 *Additional Remediation Activities* reports. The cited reports document sampling, excavation, and other site activities occurring between October 1995 and the present in an effort to remove or otherwise mitigate residual DDT and its daughter compounds (i.e., DDE and DDD) present in surface and subsurface soils encountered at this site. A brief site history and summary of the cited work follows.

It has been reported that the District maintained this site as a base for mosquito abatement activities occurring between 1958 and 1985. During the District's tenure at the site, above-ground improvements included a pesticide and application equipment storage shed, as well as an office building. Stored pesticides reportedly included triazine and other herbicides, and the insecticide DDT. The storage shed was removed during 1995 to facilitate sampling activities. As of this writing, the office building still remains.

Two underground storage tanks (UST) were also present. One tank stored gasoline. The other tank was reportedly used for the storage of both diesel fuel and larviciding oil (e.g., Golden Bear 1356). Product was dispensed from both through above-ground dispensers. The USTs and dispensers were removed during 1985 with no noteworthy release identified.

Mr. Rusmiser
RE: Mosquito Abatement District facility, Pleasanton
January 12, 1996
Page 2 of 3

During initial assessment activities conducted by Dames & Moore in October 1995, certain composite soil samples collected from in front of (north) and below the pesticide storage shed revealed the presence of DDT and daughter compounds at concentrations which exceed U.S. Environmental Protection Agency Region IX *Preliminary Remediation Goals (PRG)* for these compounds. In response, several rounds of soil excavation and resampling ensued between November and the end of December 1995 in an effort to reduce residual DDT and daughter compound concentrations to levels below PRG values. Final excavation depth was between approximately 12 to 18 inches below previous ground surface over most of the District site. Although approximately 476 tons of soil was reportedly removed in the process, residual DDT above PRG values (1.72 - 4.79 ppm) was still present in composite soil samples collected at final depth.

In an effort to homogenate the resultant post-excavation, in situ soils, bring the base of the excavation to a more uniform depth, and further reduce residual DDT concentrations, the site was disced and rototilled on January 5, 1996. Subsequent to discing and rototilling activities, thirteen discrete soil samples were collected and analyzed for the presence of DDT and daughter compounds. Approximately half (7 of 13) of the final samples exhibit DDT concentrations which still exceed the PRG value of 1.3 ppm. Of these seven, DDT concentrations range from a reported high of 3.21 to a low of 1.40 ppm. The arithmetic mean for all samples is 1.51.

Dames & Moore reports that, based on contaminant concentrations associated with the excavation of 476 tons of soil, approximately 18 pounds of DDT and associated compounds have been successfully removed from the site, 95% of the mass of DDT previously present.

We understand that the entire 7½ acre Whalen property, including the area encompassing the former District site, is slated for single-family residential development. In order to facilitate this development, the District intends to incorporate clean fill into the subject excavation to restore it to surrounding grade. Such restoration will effectively place residual DDT still present in subsurface soils at a depth 1½ to 2 feet below the resulting grade. We further understand that planned development will include significant grading and recompaction of soil about the entire 7½ acre site.

Both this office and that of the RWQCB are convinced that the bulk of DDT mass has been successfully removed from the former District site. The incorporation of clean fill and subsequent grading and recompaction of the Whalen property as a whole,

Mr. Rusmisl
RE: Mosquito Abatement District facility, Pleasanton
January 12, 1996
Page 3 of 3

including the area encompassing the former District site, will further reduce concentrations of residual DDT and daughter compounds in surface and subsurface soils at any one location.

Although the sampled maximum DDT concentration of 3.21 ppm may exceed listed PRG values, such does not exceed the 5×10^{-6} risk value of 6.5 ppm, an acceptable risk management level determined by this office for this site based on the accumulative evidence presented to us. In our opinion, planned restoration, grading, and recompaction activities will further mitigate any potential human-health risks that may have been present previously.

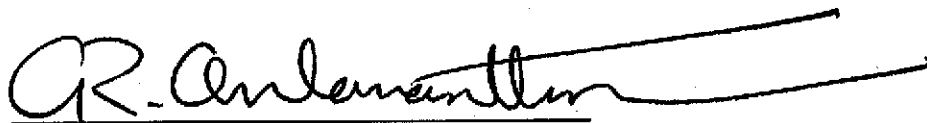
Therefore, based solely on the information made available to us, no further action beyond site restoration, grading and recompaction will be required to allow unconditional development of the subject site.

Should you have any questions, you may contact the undersigned, respectively, at (510) 567-6783 and (510) 286-1331.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist
Alameda County Environmental Health Dept.



Ravi Arulanantham, Ph.D., CHMM
Staff Toxicologist
San Francisco Bay RWQCB

cc: Jun Makishima, Acting Director
Tom Peacock, ACDEH LOP
Greg Plucker, Pleasanton Planning Department
William Halvorsen, Pleasanton Fire Department
John Whalen
Derek Armentrout, HARZA
John Menke, Dames & Moore
Thomas Mershel, New Cities Development Group

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0949

RAFAT A. SHAHID, DIRECTOR

December 1, 1995

DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

STID 2428

Mr. John Rusmisl
Alameda County Mosquito Abatement District
23187 Connecticut Street
Hayward, CA 94545

RE: (FORMER) PLEASANTON MOSQUITO ABATEMENT DISTRICT FACILITY,
WHALEN PROPERTY, 4227 PLEASANTON AVENUE

Dear Mr. Rusmisl:

Thank you for submittal of the November 29, 1995 Dames & Moore work plan for the further assessment of surface and subsurface soils at the former Alameda County Mosquito Abatement District (MAD) facility at the referenced Pleasanton site. The cited work plan proposes the collection of samples in two general areas: 1) within an excavated area below a former pesticide and equipment storage shed, and 2) the open area comprising the remainder of the MAD site. Samples, collected at discrete depths, are proposed to be analyzed for the presence of organochlorine pesticides using EPA Method 8080.

The scope of the cited Dames & Moore work plan, site history, and planned property development was discussed today during a meeting with Dr. Ravi Arulanantham, toxicologist with the San Francisco Bay Regional Water Quality Control Board (RWQCB). We have concluded that **the work plan scope is acceptable** with the few modifications discussed below.

Review of recent information regarding historical material use and storage at the Pleasanton site revealed that triazine herbicides (e.g., Atrazine, Simazine) were dispensed to application equipment from 55 gallon drums stored in the storage shed. Triazine herbicides have not yet been sought during previous sampling efforts. Although, in general, herbicides are fairly rapidly degraded or inactivated in soils, both Atrazine and Simazine have generated enough interest that Preliminary Remediation Goals (PRG) have been established (2.0 and 3.7 parts per million (ppm), respectively) by the U.S. Environmental Protection Agency. Therefore, triazine herbicides should be added to the suite of target compounds sought during this sampling event.

Mr. Rusmisl
RE: 4227 Pleasanton Ave., Pleasanton
December 1, 1995
Page 2 of 3

We also request that samples collected from the "open area" (D1, D2, D3...D8) be collected from three discrete depths representing surface, near surface, and subsurface intervals, as opposed to the two depths (6 and 18") proposed. This may be accomplished by merely collecting an additional sample from the approximate 3 foot depth at each sample location. To minimize your laboratory costs, you may choose to await receipt of analysis data from the two shallower samples first in order to determine the need for analyzing deeper samples. For example, should target compounds from the 18" sample depth be absent or at concentrations which do not pose a concern, deeper samples need not be analyzed.

Additionally, please collect sample D3 (or other suitable sample) from within the former underground storage tank (UST) dispenser area. Please also add an additional sample point near the front (north) entrance of the former office building. We have been informed that MAD vehicles were often parked at that location to be washed.

Finally, at least two "background" surface samples should also be collected from outside the MAD compound and analyzed for the presence of organochlorine compounds. Background samples may be fairly arbitrarily located provided they are collected from relatively undisturbed surface materials (0 - 6" depth) located outside the compound, but on the subject property. Such will allow a more statistically significant interpretation of compound distributions on the site as a whole.

Sampling locations and depths for samples E1, E2, and E3 need not be changed.

In summary, please modify the scope of the November 29, 1995 work plan as follows:

- o Add triazine herbicides to list of target compounds
- o Collect soil samples from (3) discrete depths in the "open area"
- o Collect sample D3 (or equivalent) from the former UST dispenser area; add a sample to the front of the former office
- o Add two (2) "background" samples

Mr. Rusmisl
RE: 4227 Pleasanton Ave., Pleasanton
December 1, 1995
Page 3 of 3

I understand that sampling activities are scheduled for early next week. As we discussed previously, should this sample data become available by Wednesday, December 6, I would like to meet with all interested parties on Thursday, December 7, to discuss available options for concluding this specific project.

Please call me at 510/567-6783 should you have any questions or comments.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: *ASP* Jun Makishima, Acting Director
Ravi Arulanantham, RWQCB
Chris Boykin, Pleasanton Fire Department
Michael Warriner, McLaren-Hart
Derek Armentrout, HARZA
John Menke, Dames & Moore
Jack Whalen

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0949

RAFAT A. SHAHID, DIRECTOR

November 17, 1995

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

STID 2428

Mr. Derek Armentrout
HARZA Consulting Engineers and Scientists
425 Roland Way
Oakland, CA 94621

RE: WHALEN CONSTRUCTION COMPANY, 4227 PLEASANTON AVENUE,
PLEASANTON - SUPPLEMENTAL UNDERGROUND STORAGE TANK
INVESTIGATION

Dear Mr. Armentrout:

I am in receipt of the November 17, 1995 HARZA *Sampling and Analysis Plan* for the supplemental subsurface investigation of the former 2000 gallon gasoline underground storage tank (UST) area. An appropriate scope for this supplemental investigation was determined in field during our visit to the site today.

The subject HARZA supplemental work plan has been accepted as submitted. Please be certain all final reports are submitted under signature of a California-registered geologist or civil engineer.

I understand that field work is slated for the morning of November 20th. Please call me at 510/567-6783 should this schedule change or you have any questions.

Sincerely,


Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: *RRP* Jun Makishima, Acting Director
William Halvorsen, Pleasanton Fire Department
Kevin Graves, RWQCB
John Whalen, 560 Gerard Ct., Pleasanton, CA 94566

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0949

Certified Mailer #P 833 981 395

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

May 4, 1989

Mr. John C. Whalen
Whalen Construction, Inc.
P.O. Box 358
Pleasanton, CA 94566

NOTICE OF VIOLATION

Dear Mr. Whalen:

On April 26, 1989, Gil Wistar of the Alameda County Department of Environmental Health, Hazardous Materials Division, inspected your premises at 4227 Pleasanton Ave. in Pleasanton. During his inspection, Mr. Wistar found several large areas of stained soil where oil or diesel spillage had occurred. Contamination was particularly evident around the gasoline and diesel pump island, where there was not only stained soil, but free liquid visible beneath the product pipeline. Other areas of noticeable contamination included the steam-cleaning pad and the waste oil storage shed towards the back of the facility.

Such gross spillage constitutes on-site disposal of hazardous waste, which violates Section 25189.5 of the California Health and Safety Code. All areas of soil contamination should therefore be excavated immediately; the soil and any liquid product should be manifested as a hazardous waste and hauled to an approved disposal location. Remediation of the contamination resulting from the underground tanks should be coordinated with Rick Mueller of the Pleasanton Fire Department.

Additionally, the inspector noted that the steam-cleaning sump, which drains directly into Arroyo del Valle, is illegal; off-site drainage from this sump should cease immediately, and the runoff collection area should be redesigned so that heavy steam-cleaning sludges and lighter hydrocarbons can be collected and disposed of as hazardous waste, or recycled in some manner. Assuming it is fully separated from sludges and hydrocarbons, wastewater from the steam-cleaning process can only be discharged into surface waters if you obtain a Waste Discharge permit from the San Francisco Bay Regional Water Quality Control Board. Another disposal option for the wastewater would be the sanitary sewer, which requires an industrial waste discharge permit from the appropriate POTW.

Mr. John C. Whalen
May 4, 1989
Page 2 of 3

During his inspection, Mr. Wistar also noted the following violations of the California Code of Regulations, Title 22, at this facility.

1. Sec. 66472 - The facility has no EPA identification number, which is required for all generators of hazardous waste.
2. Sec. 66508 - Waste oil in the wooden shed at the back of the facility has been stored for over 90 days, and no beginning accumulation date was identified on the drums containing the oil. Additionally, none of the waste oil drums was labeled properly, and throughout the yard there were many other unlabeled 55-gallon drums.
3. Sec. 66492 - The facility could not produce a set of receipts for waste oil disposal dating back three years.
4. Sec. 67241 - Many drums throughout the property are badly rusted or otherwise in deteriorated condition. Product in such drums that are full should be used up immediately or transferred to containers in better condition.
5. Sec. 67244 - The facility has failed to carry out frequent inspections and maintenance of waste storage areas, which are in poor condition. The waste oil shed should be better maintained, as should the clean oil dispensing shed adjacent to the fuel pump island.
6. Sec. 67245 - Neither the waste nor clean oil storage areas have a secondary containment system. Because the drums in both areas are considered to be stored outdoors, the volume of the required secondary containment systems should be 10% of the combined volume of all drums in storage plus at least 3 inches of freeboard to contain precipitation.

In accordance with Sec. 66328, a Plan of Correction must be submitted to this office within 30 days, or by **June 3, 1989**. The plan should specify the actions to be taken to address each of the above violations and their expected dates of completion.

Your attention is directed to Sections 25184, 25189, and 25191 of the California Health and Safety Code, which authorize civil and criminal penalties of up to \$25,000 per day for each violation of these regulations.

Mr. John C. Whalen
May 4, 1989
Page 3 of 3

If you have any questions concerning this letter, please contact
Gil Wistar, Hazardous Materials Specialist, at 271-4320.

Sincerely,

Rafat A. Shahid

Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:GW:gw

c: Doug Krause, DOHS
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Dyan Whyte, RWQCB
Rick Mueller, City of Pleasanton