

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



400 Hudson Ln.,
San Leandro, CA

R0970

RAFAT A. SHAHID, Assistant Agency Director

Alameda County
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577

CC4586

June 9, 1995

STID 2697

David Berg
Hudson I.C.S.
P.O. Box 2338
San Leandro, CA 94577

RE: QUARTERLY WELL SAMPLING REPORTS

Dear Mr. Berg:

The underground storage tank leak investigation case file for your site was recently reviewed to determine case status. File review revealed that this office has not received the technical reports documenting the requisite quarterly sampling since submittal of the June 3, 1994 Kennedy/Jenks Consultants first quarter 1994 sampling report. Hence, reports documenting the 2nd, 3rd and 4th quarter 1994, and 1st quarter 1995 sampling events are missing.

Please submit the cited reports within the next 30 days. Upon receipt and review of these data, we will be able to determine the future course of this project. Please be advised that this letter constitutes an official request for technical reports pursuant to California Water Code Section 13267(b).

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

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Karen Toth, Cal EPA DTSC
Mike Bakaldin, San Leandro Fire Department

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

STID 2697

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

September 7, 1993

Mr. David Berg
Hudson I.C.S.
P.O. Box 2338
San Leandro, CA 94577

RE: SOIL BIOREMEDIATION - HUDSON I.C.S., 400 HUDSON LANE, SAN
LEANDRO

Dear Mr. Berg:

This office has completed review of the July 21, 1993 Bio National Corporation (BNC) report documenting the results of verification samples collected from the on-site biocells, up to and including those collected July 20, 1993. The cited BNC report and associated documents support that the excavated soil, formerly impacted by diesel fuel, has been successfully treated to levels below the contract (mobile) laboratory's detection limit of 10 mg/kg.

This letter grants permission to reuse this soil on this site. I understand that the subject soil will be spread across the surface of the site once the biocells are dismantled.

Please call me at 510/271-4530 should there be additional questions regarding this project or the on-going ground water investigation.

Sincerely,


Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Mike Bakaldin, San Leandro Fire Department
Eileen Hughes, Cal EPA-DTSC
files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

STID 2697

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

July 13, 1993

Mr. David Berg
Hudson I.C.S.
P.O. Box 2338
San Leandro, CA 94577

RE: SOIL BIOREMEDIATION - HUDSON I.C.S., 400 HUDSON LANE, SAN LEANDRO

Dear Mr. Berg:

This office has completed review of the May 4, 1993 Kennedy/Jenks Consultants (KJC) report documenting the results of verification samples collected from diesel-impacted soil following approximately 16 months of on-site bioremediation managed by Bio National Corporation of Bakersfield, California. This office has additionally reviewed the KJC 4th quarter 1992 monitoring report, also dated May 4, 1993. Following are comments addressing issues raised during our reviews and following consultation with Mr. Rich Hiatt of the San Francisco Bay Regional Water Quality Control Board (RWQCB) and Ms. Eileen Hughes of Cal EPA's Department of Toxic Substances Control (DTSC). As you are likely aware, DTSC has been investigating since the late 1980's the extent of and potential source(s) for halogenated solvents discovered in ground water beneath much of central San Leandro.

Current RWQCB policy regarding the reuse of petroleum hydrocarbon-impacted soil requires such material to exhibit no detectable concentrations of target compounds after treatment before reintroduction to a site. A post treatment target level of 10 mg/kg of total petroleum hydrocarbons as diesel (TPH-D) was proposed in the January 9, 1992 Bio National Corporation soil remediation work plan. This work plan was subsequently approved in correspondence from this office dated January 17, 1992. Following treatment of affected soil at this site, verification samples collected during February 1993 exhibited concentrations of TPH-D ranging from 7.3 to 77 mg/kg of TPH-D, with a mean value of 42.5 mg/kg.

The RWQCB will not currently allow the on-site reuse of this soil unless it can be shown that, in doing so, such action poses no threat to underlying ground water. This task may be accomplished in either one of two ways: 1) bench scale leachability tests; or, 2) leachate modeling. There are several modeling programs in common use by the environmental community which are also currently recognized by the RWQCB as applicable in this case.

Mr. David Berg
RE: 400 Hudson Lane
July 13, 1993
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I spoke with Ms. Stephanie Stehling of KJC about this issue last week. We discussed the use of two different leachability modeling programs^{1,2} for this project. We also discussed the viability of reactivating the biocells in the hopes that, after a few more months of closely monitored bioremediation, the TPH-D levels would come closer to meeting the established target value of 10 mg/kg. Additionally, although not discussed with Ms. Stehling, the subject soil appears appropriate for disposal at a Class III sanitary landfill. This statement is based solely on the concentrations of TPH-D; additional tests (i.e., TCLP), however, would likely be required by the landfill to meet their permit requirements.

As it currently stands, the subject soil is *not* appropriate for on-site reuse at this time in the absence of favorable leachability modeling, bench scale tests, and/or further treatment.

Historical ground water monitoring data compiled since July 1988 has been evaluated. Monitoring well MW-2, destroyed during 1991 as a consequence of the diesel underground storage tank (UST) removal and overexcavation, was located directly proximal to this UST pit and, based on submitted ground water flow data, downgradient of it and a former gasoline UST removed during February 1987. Well MW-4 is located substantially west (400+ feet) and downgradient of these former USTs, along the western edge of the property. Ground water collected in the past from both MW-2 and -4 have been shown to be impacted by, among other target compounds, petroleum hydrocarbons identified within the range typical of gasoline (TPH-G). According to ground water data tables presented in reports issued since 1992, both MW-2 and -4 were last sampled for gasoline during March 1991. Shortly thereafter, well MW-2 was destroyed. Well MW-4, however, has not been sampled for TPH-G since.

Insufficient data have been collected to support a reduction in sampling frequency at this time. Sampling shall continue on a quarterly schedule. The data do support the need, however, to begin analyzing samples collected from MW-4 and -5 for TPH-G, in addition to TPH-D and BTEX; MW-3 shall be analyzed for TPH-D and BTEX. We do concur that MW-1 need not be analyzed for TPH or BTEX at this time. Once contaminant concentration trends have

1. Bonazountas, M. and Wagner, J.M. 1984. "SESOIL" A Seasonal Soil Compartment Model. Prepared for the U.S. EPA, Office of Toxic Substances. Arthur D. Little.
2. Federal Register, 1986, Vol. 51, No. 145, p. 7062. Organic Leachate Model.

Mr. David Berg
 RE: 400 Hudson Lane
 July 13, 1993
 Page 3 of 3

been clearly established, the extent of the fuel hydrocarbon plume has been defined, and this office and that of the RWQCB are convinced that there appears to be no or minimal threat of off-site migration by fuel hydrocarbons, the current sampling schedule shall be reevaluated.

Additionally, Ms. Hughes (DTSC) has informed us that the source of specific halogenated compounds (VOC) discovered in ground water sampled from MW-2, -4, and -5 has not been determined. Hudson ICS has not reportedly been discounted by DTSC as a potential contributor to this plume. Hence, DTSC has advised this office that Hudson ICS is required to continue with a minimum schedule of sampling for such VOCs, to be determined through consultation with DTSC. Please contact Ms. Hughes (510/540-3848) to determine the appropriate VOC sampling schedule.

Please advise this office of your decision regarding the handling the subject diesel-impacted soil (e.g., modeling, treatment, etc.). Please feel free to contact me at 510/271-4530 should you have any questions or comments.

Sincerely,


 Scott O. Seery, CHMM
 Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
 Gil Jensen, Alameda County District Attorney's Office
 Mike Bakaldin, San Leandro Fire Department
 Eileen Hughes, Cal EPA-DTSC
 Stephanie Stehling, Kennedy/Jenks Consultants
 files

bcc: Rich Hiett

Ms. Eileen Hughes
 Dept. of Toxic Substances
 Control
 700 Hienz Ave, Ste. 200
 Berkeley 94710

Stephanie Stehling
 Kennedy/Jenks Consultants
 Marathon Plaza, 10th Floor
 303 Second St.
 S.F. 9407

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0970

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

November 30, 1992

Mr. David Berg
Hudson I.C.S.
✓ 400 Hudson Lane
San Leandro, CA 94577

Subject: Deposit Account

Dear Mr. Berg:

This Department has received the Kennedy/Jenks Consultants report dated October 30, 1992 detailing the activities on the site for the second and third quarter 1992. As you are aware this Department is overseeing the ongoing investigation at the site.

The Department requires that responsible parties remit a deposit to cover costs associated with our oversight of site investigations and remediations, among other activities associated with underground storage tank sites. Such deposits are authorized by Section 3-141.6 of the Alameda County Ordinance Code, and placed into a site-specific account from which funds are drawn at the current rate of \$71 per hour as time is dedicated to the project(s). Funds remaining in the account upon completion of a project will be refunded. Conversely, should these funds be depleted before project completion, additional funds will be requested. Your deposit account established November 10, 1991 with the sum of \$855.00 is currently a negative balance of \$218.25.

Please remit a deposit of \$750.00 so that the Department may continue oversight tasks associated with the investigation occurring at the subject site.

If you have questions concerning the site investigation or the deposit account please contact me at the letterhead number.

Sincerely,

A handwritten signature in cursive script that reads "Robert Weston".

Robert Weston
Hazardous Materials Specialist

cc: Ed Howell, Chief - files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0970

RAFAT A. SHAHID, Assistant Agency Director

September 30, 1992

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

Mr. Bob E. McMenemy
Bio National Corporation
221 Old Yard Drive
Bakersfield, CA 93307

Subject: Hudson I.C.S., 400 Hudson Lane, San Leandro

Dear Mr. McMenemy:

This Department has received and reviewed the soil remediation progress report dated September 1, 1992 for the subject site. You and I discussed the report in a meeting held at this office on September 16, 1992. According to the report and information discussed in our meeting, the clean-up to date has not reduced the diesel contamination to levels acceptable for on site disposal. Current method detection limits for TPH-diesel are < 1 part per million (ppm) in soil. That level would be considered the non-detect level. In order for treated soil to be returned to the native soil, the level of TPH-diesel will have to be non-detectable.

During our meeting you raised a concern that the laboratory analytical results from samples taken in the stockpile were inconsistent between laboratories. The levels of contamination were in a range from 25 ppm to 5000 ppm for the same sample. The issue of data accuracy and precision as it relates to monitoring the progress of the remediation is critical to the ultimate success of the clean-up and disposition of the stockpile. This issue will need to be clarified and resolved prior to further work.

After further review and discussion with the Regional Water Quality Control Board this Department does not concur with the recommendations contained in the report regarding the removal of the plastic liner and subsequent treatment of the contaminated soils on top of and in contact with the native soil. Soil undergoing treatment will have to be kept isolated from native soil.

If you have questions regarding this letter please contact me.

Sincerely,

Robert Weston
Hazardous Materials Specialist

Bio National Corporation
September 30, 1992
Page 2

cc: Mr. Ed Howell-files
Mr. Robert Hanscom - Hudson I.C.S.
Ms. Stephanie Stehling - Kennedy/Jenks Consultants
Ms. Eileen Hughes - CAL EPA, DTSC
Mr. John Jang - SFRWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0970

December 26, 1991

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

Mr. Robert Hascom
Hudson Company
400 Hudson Lane
San Leandro, CA 94577

RE: CAL-EPA REGIONAL HYDROGEOLOGY AND CONTAMINATION STUDY, CENTRAL
SAN LEANDRO

Dear Mr. Hascom:

The California Environmental Protection Agency (Cal-EPA), Department of Toxic Substance Control (DTSC), has been investigating the presence of several priority pollutants, primarily volatile organic compounds (VOC), heavy metals, and nitrates, in soil and ground water occurring in the central San Leandro area since approximately 1986. Currently, six sites are being investigated with Cal-EPA lead or oversight, as follows:

- o 139th Avenue site (Cal-EPA lead)
- o Factor Avenue site (Cal-EPA lead)
- o Singer-Friden site (Cal-EPA lead)
- o Caterpillar site (Cal-EPA oversight)
- o Hudson ICS (Cal-EPA oversight)
- o Staefa Control System Inc./2481 Washington Avenue (Cal-EPA oversight)

Because of similar contamination found at these sites, DTSC suspects that a larger, regional contamination problem exists that requires further investigation. Presently, DTSC is conducting a Regional Hydrology and Contamination Study in Central San Leandro. The purposes of this study include, among other elements:

- o defining as far as possible the known vertical and horizontal extent of contamination in the area;
- o identifying existing public and/or private wells that can be used by DTSC for monitoring purposes;
- o instituting coordinated sampling; and,
- o defining the hydrogeology of the area.

Mr. Hascom
RE: Cal-EPA VOC Study
December 26, 1991
Page 2 of 3

The intent of the DTSC study is to develop the best possible data on the extent of contamination while realizing no unnecessary expenditure of public funds. Following the presentation of the study's final report, DTSC will develop a work plan for conducting further study, targeting potential source areas and "hot spots" identified during the course of this phase of the investigation.

The DTSC has requested Alameda County's assistance in developing this study and report by coordinating ground water sampling efforts for those sites under county lead. To meet this goal, you are requested, on a volunteer basis, to supplement the sampling slated to occur at your site(s), listed below, during January - March 1992, in addition to those sampling/monitoring activities already required, as follows:

- 1) Collect and analyze ground water samples from at least one well for VOCs (EPA Method 624, or 601/602). The well sampled for this task is to be chosen based upon its potential for detection of VOCs relative to other wells on-site, i.e., its proximity downgradient of a former waste oil or solvent underground storage tank, VOCs identified in prior analyses, etc.
- 2) Present this data, along with other requisite sampling/monitoring data, in the 1992 first quarter report. Submit a copy of this report directly to the DTSC, at the following address:

California Environmental Protection Agency
Department of Toxic Substance Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710
Attn: Eileen Hughes

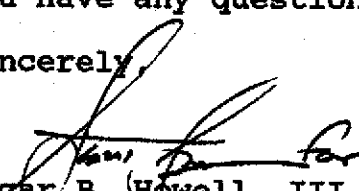
The sites affected by this request are as follow:

o [REDACTED]

Mr. Hascom
RE: Cal-EPA VOC study
December 26, 1991
Page 3 of 3

Thank you in advance for your cooperation in this matter. Please feel free to contact Mr. Scott Seery of this Division at 510/271-4320, or Ms. Eileen Hughes of DTSC at 510/540-3848, should you have any questions.

Sincerely,



Edgar B. Howell, III
Chief, Hazardous Materials Division

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Eileen Hughes, DTSC
Mike Bakaldin, San Leandro Fire Department
Jim Ferdinand, Eden Consolidated Fire District

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0970

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

November 25, 1991

Mr. Robert Hascom
Vice President, Manufacturing
Hudson I.C.S.
400 Hudson Lane
San Leandro, CA 94577

Subject: Underground Storage Tank Investigation, 400 Hudson
Lane, San Leandro, CA

Dear Mr. Hascom:

I have received and reviewed your consultant's "Proposed Workplan for Soil Remediation and Subsurface Investigation", dated October 30, 1991. Thank you for the prompt attention given to this investigation. Upon evaluation of the workplan, there appear to be several points in need of clarification prior to my concurrence:

- 1) The workplan submitted calls for the construction of a monitoring well ten (10) feet from the excavation. According to the "Tri-Regional Board Staff Recommendations" (August 1990), the monitoring well must be placed "within 10 feet of the tank." It will, therefore be necessary to modify the workplan and submit an addendum to this office.
- 2) If at all possible coordinate the quarterly sampling to correspond to the samples taken at the Singer site in the area adjacent to the investigation on your property. This could be accomplished by having your consultant advise Woodward & Clyde of the time frame for the proposed sampling.
- 3) Although Monitoring well #1 is a substantial distance from the excavation, at least one set of samples should be taken from the well to allow adequate analysis of the site.
- 4) In light of the contamination previously noted from purgeable halocarbons at the site, please sample all the monitoring wells at least once during the year of monitoring for these constituents.

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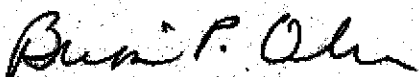
5) This office agrees with the plan to monitor for at least year before further evaluation of the site is to be made.

6) Upon receipt of the addendum to the workplan, you may commence construction of the monitoring well. Please provide this office with forty-eight (48) hours notice prior to the construction of proposed monitoring well.

If you have any questions, please do not hesitate to call our office at (510) 271-4320.

Sincerely,

Alameda County Division Of Hazardous Materials



Brian P. Oliva, REHS
Hazardous Materials Specialist

cc: Mr. Eddy So, SFBRWQCB
Ms. Eileen Hughes, State of CA EPA DTSC
Mr. Randall Morrison, Crosby Heafey, Roach & May
Ms. Stephanie Stehling, Kennedy Jenks Consultants

ALAMEDA COUNTY
HEALTH CARE SERVICES

2 AGENCY
DAVID J. KEARS, Agency Director



R0970

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

September 16, 1991

Mr Robert Hascom
Vice President, Manufacturing
Hudson I.C.S.
400 Hudson Lane
San Leandro, CA 94577

Subject: Underground Tank Investigation at 400 Hudson Lane,
San Leandro, CA 94577

Dear Mr. Hascom:

This office is in receipt of "Analytical Results of Soil Samples", dated August 6, 1991, from Kennedy/Jenks, your consultant of record. Thank you for forwarding the report to our office.

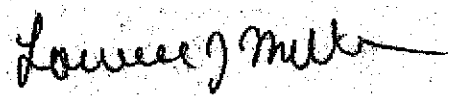
Upon review of your file there appears to be several issues in need of clarification:

- 1) You will need to provide monthly groundwater levels from the monitoring wells in order to obtain the hydraulic gradient. You will also have to obtain samples and analyze the groundwater for two years at the site.
- 2) The horizontal and vertical extent of contamination at this time has not yet been determined. It will be necessary for your consultant to provide this office with a workplan that will adequately define such horizontal movement. Please submit a workplan by September 28, 1991 that will address this issue.
- 3) It will be necessary for you to submit quarterly monitoring reports testing for Total Petroleum Hydrocarbons as diesel (method 3510) and also Benzene, Toluene, Ethylbenzene, and Analyze (method 8260). This report should be submitted by your consultant and should bear the stamp of a Registered Geologist or a Professional Engineer.

You are also requested to submit a deposit of \$855.00 made payable to the Count of Alameda, for involvement in their oversight responsibilities for the cleanup of the above site. This deposit is authorized by Section 3-141.6 of the Ordinance Code of Alameda County and is used to cover the expenses incurred by County personnel in their oversight duties . Records are maintained of the time County employees commit to a project and the deposit is charged at an hourly rate. Upon completion of the project, the balance will be returned to you.

Should you have any questions pertaining to any of the above requests please contact Brian P.Oliva, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,



Lowell Miller
Senior Hazardous Materials Specialist

cc: Stephanie A. Stehling, Kennedy/Jenks
Eddie So, SFBRWQCB
Mike Bakaldin, SLFD