ALAMEDA COUNTY **HEALTH CARE SERVICES AGENCY**

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR DAVID J. KEARS, Agency Director

R0986

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

May 26, 1993

Betty Ann Hunter c/o Sheldon Crandall 155 Grand Ave., #100 Oakland, CA 94612-3757

STID 4580

Investigations at 2521 Central Avenue, Alameda, California

Dear Ms. Hunter,

On May 4, 1993, this office requested that you conduct a Preliminary Site Assessment at the above site in response to contamination observed in the ground water, 1,300 ppb diesel, during the tank removal. However, according to a Regional Water Quality Control Board (RWQCB) Memorandum that was distributed at an RWQCB meeting on May 10, 1993, they are in the midst of developing a policy that will not be requiring any further actions beyond source removal for home heating oil tank sites at private residences. RWQCB has requested that until this policy is completed, only source removal will be required of home heating oil tank sites (Please refer to attached copy of memo).

Per my conversation with Richard Hiett, RWQCB, on May 25, 1993, Mr. Hiett stated that the memorandum is applicable to this site. According to the lab analysis results of soil samples collected from the sidewalls and stockpiled soil, it appears that source removal has been removed to the extent feasible. Therefore, at this time, this office will not require further work, and we will be recommending closure for this site to RWQCB.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Edgar Howell-File(JS)

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DAVID J. KEARS, Agency Director

R0986

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

May 26, 1993

Richard Hiett RWQCB, S.F. Bay Region 21010 Webster St., Ste 500 Oakland, CA 94612

STID 4580

RE: The site located at 2521 Central Avenue, Alameda, California

RECOMMENDATION FOR UST CASE CLOSURE

Dear Mr. Hiett,

On April 29, 1993, a 1,500-gallon heating oil underground storage tank was removed from the above site, which is an apartment complex. Ground water was observed in the tank pit. Two soil samples were collected from the sidewalls, one from the fill end of the tank and one from the other end, and one ground water sample was collected from the tank pit. These samples were analyzed for TPHd and BTEX. Analysis of all the soil samples did not identify any contaminants, however, analysis of the ground water sample identified 1,300 ppb TPHd, 0.7 ppb toluene, 0.4 ppb ethylbenzene, and 2 ppb xylenes (Please refer to copy of lab analysis results).

In a letter, dated May 4, 1993, I requested that this site conduct a Preliminary Site Assessment, in response to the contaminant concentrations identified in the ground water. However, since that time, I have been made aware of RWQCB's new policy regarding home heating oil tank sites, which states that these sites will only be subject to source removal requirements.

Per our conversation on May 25, 1993, this policy applies to this site. It appears that this site has conducted source removal to the extent feasible since all the soil samples results were non detect.

Please review all the attached information, and notify us of the RWQCB's decision as to whether it is in concurrence with this Department's decision. Please contact me if you have any questions.

Mr. Richard Hiett

Re: 2521 Central Ave.

May 26, 1993 Page 2 of 2

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Edgar Howell-File(JS)

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State Water Resources Control Board
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80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

May 4, 1993

Ms. Betty Ann Hunter 155 Grand Ave., #100 Oakland, CA 94612-3757

STID 4580

Re: Required investigations at 2521 Central Avenue, Alameda, California

Dear Ms. Hunter,

On April 29, 1993, a 1,500-gallon heating oil underground storage tank was removed from the above site. Two soil samples were collected from the sidewalls, one from the fill end of the tank and one from the other end, and one ground water sample was collected from the tank pit. These samples were analyzed for Total Petroleum Hydrcarbons as diesel (TPHd) and benzene, toluene, ethylbenzene, and xylenes (BTEX). Analysis of the soil samples did not identify any contaminants, however, analysis of the ground water sample identified 1,300 parts per billion TPHd and traces of BTEX.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that investigations be conducted when there is evidence to indicate that a release from an underground storage tank may have impacted the ground water.

You are required to conduct a **Preliminary Site Assessment (PSA)** to determine the lateral and vertical extent and severity of ground water contamination which has 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 <u>Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks</u>, 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:

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

Ms. Betty Ann Hunter
Re: 2521 Central Ave.

May 4, 1993 Page 2 of 4

installation of these wells, soil samples are to be collected at five-foot-depth intervals and any significant changes in lithology. Having reviewed this office's files, it appears that there is a site fairly close to your site with monitoring wells at 2501 Santa Clara Avenue. However, if you wish to use these wells to determine ground water gradient for your site and these wells are not within 100 feet of your site, you will be required to show that these wells are hydraulically connected before using these wells as part of gradient determinations.

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, and water level measurements are to be collected monthly for the first three months, and then quarterly thereafter. If the initial ground water elevation contours indicate that ground water flow directions vary greatly than you will be required to continue 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 60 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.

Ms. Betty Ann Hunter Re: 2521 Central Ave. May 4, 1993 Page 3 of 4

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

- 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 a work plan pursuant to Section 2722 (c) (d) of Title 23 California Code of Regulations. 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 Hiett, at the San Francisco Bay Region-Water Quality Control Board, on all correspondence and reports regarding this site.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

Ms. Betty Ann Hunter Re: 2521 Central Ave. May 4, 1993 Page 4 of 4

cc: Richard Hiett, RWQCB

Dave Cottle Cottle Industries P.O. Box 7 Antioch, CA 94509

Edgar Howell-File(JS)