

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

RO#1078

VIA FAX and U S MAIL
January 5, 1995
STID# 337

ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIVISION
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

Mr. Robert J. Robbins, C.P.G.
Environmental Program Manager
ARATEX Services, Inc.
154 South Main Street
Lodi, WI 53555

RE: Soil and Groundwater Investigation / Remediation
Related to the Former Underground Storage Tanks
at the former Aratex Services Incorporated
958 28th Street, Oakland, California 94608

Dear Mr. Robbins:

The Alameda County Department of Environmental Health, Environmental Protection Division has recently reviewed the case file for the referenced site. We are in receipt of the Subsurface Investigation Workplan (May, 1994) and the Semi-Annual Monitoring Report (December, 1994) prepared and submitted by RMT, Inc. for the referenced site.

This office has the following comments regarding the soil and groundwater investigation related to the former underground storage tanks at the site:

- 1) The workplan for subsurface investigation is acceptable provided the following items are addressed:
 - * Soil samples must be collected from the borings at five feet interval, at lithologic changes and at the water table. Field Instruments are acceptable as screening tools only. Any evidence of soil contamination such as odor, visual staining or field instrument readings must be verified by analysis from a state certified laboratory. One of the soil samples analyzed should be from immediately above water table.
 - * Additional borings appeared to be necessary to verify the remaining soil contamination in the area of the former boiler fuel tank. Analytical results of the soil samples collected during the installation of MW-8 has not been submitted.
 - * Monitoring well MW-A3 can be dropped from the groundwater monitoring network.

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- * Monitoring well MW-5 must be sampled in the next quarterly monitoring event (2/95). If the groundwater sample exhibit non detect for petroleum hydrocarbon contaminants, the following monitoring event must occur in 11/95.
 - * Monitoring wells MW-A1, MW-A2, MW-4A, MW-6, MW-7, and MW-8 must be sampled consistently every quarter for one year (2/95, 5/95, 8/95, 11/95) for the following target compounds - TPH gasoline, TPH diesel, benzene, ethyl benzene, toluene and xylene. Appropriate quantitation reporting limits must be used.
 - * Groundwater elevation readings must be incorporated in the quarterly monitoring program and verified groundwater flow direction must be established at the site.
- 2) Following the groundwater monitoring event of November, 1995, the monitoring program will be evaluated or case closure will be recommended.
 - 3) Please notify this office at least 72 hours in advance of any site activity. A representative from this office will schedule a site visit.

The data that will be gathered by this phase of the investigation will determine the extent of the soil and groundwater petroleum hydrocarbon contamination which appeared to be limited in the vicinity of the former tanks. If the results indicate that the contamination is indeed limited at the site and the levels of residual soil and groundwater contamination do not pose a threat to human health and the environment, the concept of **Ground Water Non-Attainment Areas** may be considered for the site. This is a plume management option that a discharger may or may not use. Enclosed are guidance documents on non attainment policy for your reference.

The current property owner (Ms. Bea Slater) had recently expressed her concerns regarding the on going clean up at the site and the difficulties encountered with the property, both financially and future developments for the site. In order to address her concerns, I'm planning to schedule a meeting between this agency, Mr. Kevin Graves (RWQCB's contact person), Ms. Bea Slater and yourself to discuss the road map we can develop for the site to reach case closure. This meeting shall be scheduled after the implementation of the approved work plan and the soil data (verification of residual soil contamination left in place) have been submitted.

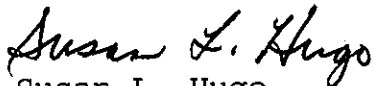
Mr. Robert Robbins
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The workplan must be implemented **no later than 30 days** from the date of the letter. A report must be submitted within **30 days** after completion of the investigation. Until cleanup is complete, you will need to submit reports to this office **every three months**. Your report should also include the site map delineating contamination contours for soil and groundwater based on recent data. Any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained.

All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project. Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency.

Please contact me at (510) 567-6780 if you have any questions concerning this letter.

Sincerely,



Susan L. Hugo
Senior Hazardous Materials Specialist

Enclosure

cc: Rafat A. Shahid, Director, Environmental Health
Kevin Graves, San Francisco Bay RWQCB
Edgar B. Howell, Chief, Environmental Protection Div. /files
James Van Nortwick, RMT, Inc., 4640 Admiralty Way, Suite 301
Marina Del Rey, California 90292-6621
Bea Slater, 599 Loganberry Drive, San Rafael, CA 94903

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

January 27, 1994
STID# 337

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

R01078

Mr. Robert J. Robbins, C.P.G.
Environmental Program Manager
ARATEX Services, Inc.
154 South Main Street
Lodi, WI 53555

**RE: Status of the Soil and Groundwater Investigation /
Remediation at Aratex Services Incorporated
958 28th Street, Oakland, California 94608**

Dear Mr. Robbins:

The Alameda County Department of Environmental Health, Hazardous Materials Division has recently reviewed the case file for the referenced site. We are in receipt of the "Workplan for Soil Vapor Extraction System Pilot Test" (September, 1993) submitted by RMT, Inc.

Based on this review, the work plan is acceptable provided the following items are addressed:

- 1) Rationales to substantiate the selection of the referred location of the two observation wells to be installed on site must be provided to this office.
- 2) Please clarify if the two observation wells to be installed are screened and the depth at which they will be screened.
- 3) Field instruments are acceptable as a screening tools only. Air samples collected and analyzed in the field during the soil vapor extraction pilot test at peak, equilibrium, and in-between runs must be verified by analysis from a state certified laboratory.
- 4) Permits from other regulatory agencies must be followed. Provide this office with copies of permits from other regulatory agencies.
- 5) Please notify this office at least 48 hours in advance for the start up of the work plan implementation so a site visit can be arranged by a representative from this office.

Response to the items listed above must be provided to this office before workplan implementation and no later than February 25, 1994.

Mr. Robert Robbins
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January 27, 1994
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In addition, based on the review of the reports in the case file, the following issues must be addressed regarding the status of the soil and groundwater investigation at the site:

- 1) At this time, groundwater monitoring must occur **every quarter**. We acknowledge that semi-annual monitoring was approved in 1990 based on the site information this agency had at that time. Groundwater monitoring wells must be sampled on a quarterly basis and analyzed for the following target compounds : TPH gasoline, TPH diesel, benzene, toluene, ethyl benzene and xylene. Groundwater elevation readings must be incorporated in the quarterly sampling event. After four quarters of non detectable levels had been achieved, the monitoring program will be evaluated or case closure will be recommended.
- 2) Soil borings GP-3 and GP-8 had free product. Please clarify if the site had been completely delineated. If not, a workplan must be submitted to determine the extent of soil and/or groundwater contamination at the site.
- 3) The source of product found in GP-3 and GP-8 which are both upgradient of the two gasoline tanks must be investigated and identified.
- 4) Monitoring well MW-7 appears to be upgradient of the former boiler fuel tank. Per Tri-Regional Board Staff Recommendations (August 10, 1990), one monitoring well must be installed within ten feet of the former tank, in the verified downgradient direction.

Response to the four issues listed above must be provided to this office no later than March 14, 1994.

A report must be submitted within **45 days** after completion of the investigation. Until cleanup is complete, you will need to submit reports to this office **every three months** or at a more frequent interval, if specified at any time. In addition, the following items must be incorporated in your future reports or workplans:

- a cover letter from the responsible party or tank owner stating the accuracy of the report and whether he/she concurs with the conclusions and recommendations in the report or workplan

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- site map delineating contamination contours for soil and groundwater based on recent data should be included and the status of the investigation and cleanup must be identified
- proposed continuing or next phase of investigation / cleanup activities must be included to inform this department or the RWQCB of the responsible party or tank owner's intention
- any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained
- historical records of groundwater level in each well must be tabulated to indicate the fluctuation in water levels
- tabulate analytical results from all previous sampling events; provide laboratory reports (including quality control/quality assurance) and chain of custody documentation

All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project.

Because we are overseeing this site under the designated authority of the Regional Water Quality Control Board, this letter constitutes a formal requests for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency.

Please contact me at (510) 271-4530 if you have any questions concerning this letter.

Sincerely,



Susan L. Hugo
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health
Rich Hiett, San Francisco Bay RWQCB
Edgar B. Howell, Chief, Hazardous Materials Division - files
James Van Nortwick, RMT, Inc., 4640 Admiralty Way, Suite 301
Marina Del Rey, California 90292-6621

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R01078

17 August 1989

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

Beatrice Slater
R.M. Land and Investment
599 Loganberry Street
San Rafael, CA 94903

Subject: Groundwater Monitoring Wells at 958 28th Street, Oakland.

Dear Ms. Slater:

The San Francisco Bay Regional Water Quality Control Board has expressed concerns regarding the groundwater monitoring program being implemented at this site. Part of the preliminary site assessment process is to clearly define the direction of groundwater flow and the extent of any lateral spread of a contaminant plume. The three wells currently at this site leave some question as to these matters.

In the IT Corporation report of 29 March, 1989, groundwater contamination was measured in wells 1 and 2, but not in well 3, which is oriented east-southeast relative to well 1 and northeast relative to well 2. On the basis of this measurement, the report concludes that groundwater flow direction is southwest. This may be so, but there are ways by which this fact can be demonstrated.

Defining any lateral orientation to the contaminant plume may be achieved through the installation of additional wells located a short distance from areas of known contamination (wells 1 and 2). In the absence of this information, it will be impossible to offer a qualified opinion that the groundwater contamination problem at this site will ever be adequately addressed.

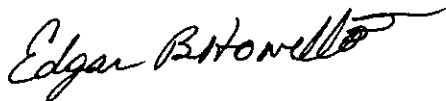
We request that at least two additional groundwater monitoring wells be installed at this site to gauge the extent of any lateral contamination. One installed north of well 1 and another south of well 2 would seem good areas for placement. In addition, groundwater flow direction must be determined with greater certainty.

Beatrice Slater
R.M. Land and Investment
599 Loganberry Street
San Rafael, CA 94903
17 August 1989
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Concerning the quarterly monitoring program being implemented at this site. This office has not yet received any data regarding what has been measured at 958 28th Street, Oakland, other than what is documented in the IT report of 29 March, 1989. As the lead agency overseeing the program, our effectiveness is greatly reduced when nobody keeps us informed. Please ensure that a copy of any analytical data derived from this program is submitted to this office for review.

Please direct all further correspondence or questions you may have regarding this matter to Dennis Byrne, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,



for Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:DB

cc: Scott Huegenberger, SFBRWQCB
Rebecca Whitsett, Aratex Services Inc.
1834 Walden Office Square, Suite 450
Schaumburg, IL 60173-4299
Paul Valva, Valva Realty Company, 678 14th St. Oakland, 94607
Richard Rifkin, Rifkin Investments, 81 Lansing St. Suite 106
San Francisco, CA 94101

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R01078

8 May, 1989

John C. Drachenberg
LCB Associates
Dufwin Towers
519 17th Street
Suite 700
Oakland, Ca. 94612

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415) 271-4320

Subject: Groundwater monitoring well installation at 958 28th Street,
Oakland.

Dear Mr. Drachenberg:

Thank you for the IT Corporation report dated 29 March, 1989, concerning the groundwater monitoring well installation conducted at the above location (IT Project #190452). A review of the report indicates that the wells were installed in accordance with guidelines established by the San Francisco Bay Regional Water Quality Control Board.

Data derived from these wells indicates that there is a groundwater contamination problem associated with this site. Consequently, a quarterly monitoring program is required. Samples should be collected and analyzed by a certified laboratory for Total Petroleum Hydrocarbons-Low Boiler (EPA Method GCFID 5030), Total Petroleum Hydrocarbons-High Boiler (EPA Method GCFID 3510), and Benzene, Toluene, Xylene and Ethylbenzene (EPA Method 602 or 624).

Quarterly monitoring will be required for a minimum of one year. At the end of this period a decision regarding the frequency and duration of further sampling will be made. Please submit the results of each quarterly analysis to this office and to the San Francisco Bay Regional Water Quality Control Board.

If you have any questions or require further clarification concerning this matter, please contact, Dennis Byrne, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,

Rafat A. Shahid, Chief,
Hazardous Materials Division

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621

R01078

Certified Mail # P 691 211 068

DEPARTMENT OF ENVIRONMENTAL HEALTH

(415)271-4320

October 12, 1988

Aratex Services, Inc.
16001 Ventura Blvd.
P.O. Box 3000
Encino, CA 91316

ATTN: Eric S. Burnett, PH.D.

RE: UNDERGROUND TANK CLOSURE PROPOSAL AT 958 E. 28th STREET
OAKLAND, CA 94607

Dear Mr. Burnett:

Our department has reviewed the proposal concerning site assessment and monitoring well installation at ARATEX Services, Inc., 958 E. 28th St., Oakland, CA., submitted September 26, 1988, by IT Corporation (Proposal #A3541P07). The proposed investigative work is not adequate to define the extent of soil and possible groundwater contamination. Therefore, we request the proposal to include the following additional information before any work is done at the site.

1. Determination of the lateral and vertical extent of soil contamination at the site of the diesel tank. The sample from the site boring should be taken 1-2 feet below the bottom of the excavation at suspected worse case location.
2. The monitoring well proposed to be installed at the 7,000 gallon gasoline tank site, must be within 10 feet of the tank excavation and shall be installed according to RWQCB's "Guidelines for Addressing Fuel Leaks" (1988). Analytical soil samples must be collected every 5 feet to groundwater or maximum depth of 40 feet.
3. A diagram showing location of proposed soil boring and monitoring well installation.
4. Hydraulic gradient must be established through historical data from wells in close proximity to the site and/or installation of additional groundwater wells. Groundwater gradient cannot be established through interpretation of soil samples as stated.
5. Detailed personnel protection and safety plan specific for the site.
6. The presence of any fuel product in the monitoring well must be checked using an optical probe or other method having similar accuracy. The use of a bailer is not acceptable.

Aratex Services, Inc.
Encino, CA 91316
RE: 958 E. 28th St., Oakland, 94607
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October 12, 1988

7. Approved method used for sealing soil boring.
8. All soil and groundwater samples taken must be analyzed for the following:
 1. All Petroleum Hydrocarbons - gasoline and diesel (DOHS method)
 2. BTX&E - (8240) - Analytical samples maynot be composited.
9. All reports and proposal must be signed by a California Certified Engineering geologist, California Registered geologist or a California Registered Civil Engineer.
10. Within 60 days of this letter, submit a report containing the chain of custody records, monitoring well and soil boring logs, analytical results, site hydrogeology and a discussion on the type and extent of contamination found.
11. An additional \$300.00 deposit to cover our time for report, review and remediation monitoring.

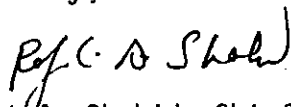
Please resubmit your proposal for the above site within 15 days, on or before October 28, 1988. After approval by our department of the revised proposal, site assessment proceedings may begin.

Please be aware that final approval for the work performed on your site, is the responsibility of the Regional Water Quality Control Board.

Additionally, the copy of the certificate of Disposal by H&H Ship Service Co. shows incorrect tanks associated with the site. Please send a copy of the valid disposal certificate.

If you have any questions regarding the above, please contact Mary Jo Meyers-Barnes, Hazardous Materials Specialist, at (415) 271-4320

Sincerely,



Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:MJM-B:mnc

cc: RWQCB
Dwight Hoenig, DOHS
IT Corporation
Mary Jo Meyers-Barnes
Files