ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

R01096

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

December 9, 1993

Mr. Neil Hamre
E.C. Buehrer Associates, Inc.
1061 Eastshore Hwy.
Albany, CA 94710

STID 1323

Re: Request for closure for the site located at 1061 Eastshore Hwy., Albany, California

Dear Mr. Hamre,

This office is in the process of reviewing the files for the above site to determine whether this site is ready for closure. This office has noted that there is still some pertinent information missing to adequately assess this site for closure. We are missing documentation on the fate of the excavated soil resulting from the initial removal of the 300-gallon and 1,000-gallon underground storage tanks (USTs), the removal of the second 1,000-gallon UST, and overexcavation of the site. Additionally, we are missing information documenting the disposal of all the above USTs from the site. This documentation needs to be submitted before this office can recommend this site for closure. Please submit these documents **within 30 days** of the date of this letter.

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

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Laura J. Odenthal
Aegis Environmental, Inc.
1050 Melody Lane, Ste 160
Roseville, CA 95678

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
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DAVID J. KEARS, Agency Director

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DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
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80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

October 7, 1993

Mr. Neil Hamre
E.C. Buehrer Associates, Inc.
1061 Eastshore Hwy.
Albany, CA 94710

STID 1323

Re: Investigations at 1061 Eastshore Hwy., Albany, California

Dear Mr. Hamre,

In March 1993, this office sent you a letter stating that after two additional quarterly monitoring events at the site, this office would reevaluate the files to determine whether the site could be recommended for closure or whether additional work would be required. The two additional quarterly monitoring events have been completed, and this office has come to the decision that this site is near to closure. However, since consistently low levels of diesel and intermittent appearances of gas and benzene have been identified in the monitoring wells, this office needs to be assured that the ground water beneath the site is nonpotable. The State Water Resources Control Board's Resolution No. 88-63 has defined nonpotable water to be water containing greater than 3,000 ppm Total Dissolved Solids.

You are required to analyze the ground water for TDS, to confirm that this water is nonpotable before the site can be granted closure in its current condition.

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

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Laura J. Odenthal
Aegis Environmental, Inc.
1050 Melody Lane, Ste 160
Roseville, CA 95678

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
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DAVID J. KEARS, Agency Director

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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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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

March 17, 1993

Mr. Neil Hamre
E.C. Buehrer Associates, Inc.
1061 Eastshore Hwy.
Albany, CA 94710

STID 1323

Re: Investigations at 1061 Eastshore Hwy., Albany, California

Dear Mr. Hamre,

This office has received and reviewed Aegis Environmental, Inc.'s Request for Site Closure Report, dated March 8, 1993. Although fairly low concentrations of diesel, gasoline, and oil and grease have been identified in ground water samples collected from the on-site wells within the period between April 1991 and the present, this office is concerned by the fact that the levels of gasoline identified from Wells MW-6 and MW-9 appear to have increased in the last several quarterly sampling events. This suggests that contaminants may still be leaching out from the soil into the ground water. This office is requesting that quarterly monitoring be continued for another two quarters to determine whether gasoline concentrations in ground water will continue to increase and whether benzene and diesel concentrations are still leaching out into the ground water and at what levels. Additionally, this office feels that this is a valid request since elevated levels of the heavier hydrocarbons have been left in the soils at the site. Based on the results of the following two quarterly ground water sampling events, this office will determine whether the site is qualified to be recommended for site closure or what additional work will be required if it is determined that ground water contamination is still a problem at the site.

In response to the PCB issue, this office will not be requiring that you address further investigations related to the 300 ppb PCB identified in surface soils along the border of the site, since this contamination appears to be the result of operations on the neighboring Alcan Aluminum property.

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

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Thomas J. Knoch
Aegis Environmental, Inc.
1050 Melody Lane, Ste. 160
Roseville, CA 95678

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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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

October 23, 1992

Clayt Johnson
Buehrer, Inc.
1061 Eastshore Hwy.
Albany, CA 94710

STID 1323

RE: Investigations at 1061 Eastshore Hwy., Albany, California

Dear Mr. Johnson,

This case file has been transferred to another Hazardous Materials Specialist, Juliet Shin.

This office has recently received the Quarterly Ground water Monitoring Report, dated October 13, 1992. Thank you for your timeliness in submitting the quarterly reports.

In reviewing the files, it was noted that 300 ppb of Aroclor 1254 was identified from a surface soil sample, SSS-3, collected from near the former on-site transformer in May 1990. Although this concentration is relatively low, some excavation and resampling may be required as one method to confirm that this contamination problem is not more extensive. If you choose not to conduct excavation and additional sampling from this area, a risk assessment will be required to address this contamination problem before the site can request closure.

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

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Abel Ramirez Jr.
Aegis Environmental, Inc.
1050 Melody Lane, Ste 160
Roseville, CA 95678

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

R01096

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

November 25, 1991

Mr. Neil Hamre
1061 Eastshore Highway
Albany, CA 94710

RE: E.C. Buehrer, 1061 Eastshore Highway, Albany,CA

Dear Mr. Hamre:

I have reviewed your Soil Remediation Workplan dated August 21,1991, and your Underground Tank Closure Plan prepared by Aegis Enviromental. It is my understanding after speaking with Mr. Larry Braybrooks of Aegis that you would like to perform your remediation concurrently with the underground tank removal. Before I can approve your workplan, the following conditions must be met:

1. A monitoring well must be installed within 10 feet of the former tank location which is the source of the contamination. This new well is to replace MW1 - MW4 that are going to be destroyed during the excavation.

2. Confirmatory sidewall samples must be taken at a minimum of every 20 linear feet

3. Figure 2, Site Map of the soil remediation workplan needs to be amended to identify the removal of the existing underground tank, and the proposed areas of excavation. In addition, Sect. 3.2, Page 4, needs to be amended to reflex the removal of the existing underground tank.

If you have any questions, please contact me at 271-4320.

Sincerely,

Larry Seto
Sr. Hazardous Materials Specialist

cc: Larry Braybrooks, Aegis Enviromental
RWQCB
Rafat Shahid, Assistant Agency Director, Enviromental Health
Gil Jensen, Alameda County District Attorney's Office
Howard Hatayama, DTSC
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

R01096

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

February 27, 1991

Mr. Clayton Johnson
E. C. Buehrer, Inc.
1061 Eastshore Hwy.
Berkeley, CA 94710

Re: **Phase II Hydrogeologic Assessment Work Plan for Buehrer Albany facility, submitted by Aegis Environmental, Inc.**

Dear Mr. Johnson:

Thank you for submitting the additional deposit funds we had requested for oversight of your project. We have reviewed the Aegis work plan, dated January 9, 1991, which proposes certain tasks according to requirements in a November 20, 1990 letter from this office. This work plan calls for the installation of four borings to be converted to monitoring wells; we have no objection to the locations specified for these borings/wells. However, because the overall goal is to define the downgradient limits of the groundwater contaminant plume, more wells will be required if those to be installed do not accomplish this definition.

The work plan seems unclear on the laboratory analyses to be performed on soil and groundwater samples. In any case, due to what has been found in previous investigations, the following analyses and methods must be included for all soil and groundwater samples:

Total oil & grease (method 5520);
Total petroleum hydrocarbons as diesel (methods 3550 and 3510 for soil and groundwater, respectively);
Total petroleum hydrocarbons as gasoline (method 5030 for soil and groundwater); and
BTEX/chlorinated hydrocarbons (methods 8240 and 624 for soil and groundwater.

Finally, in the November 20 letter, we requested a proposal for defining the horizontal extent of shallow soil contamination, and for remediating it. The work plan submitted by Aegis did not address this issue.

Based on the above discussion, please prepare an amended work plan for additional subsurface investigation, to be submitted to this office by **March 27, 1991.** As with all technical documents, copies of this proposal must also be sent to the Regional Water Quality Control Board in Oakland (attention: Lester Feldman).

Because we are overseeing this site under the designated authority of the Water Board, this letter constitutes a formal request for technical reports, per Sec. 13267(b) of the California Water Code. Failure to respond in a timely manner could result in civil liabilities under the Water Code of up to $1,000 per day. Other violations of California law may also be cited.

If you have any questions about this letter or about remediation requirements established by the RWQCB, please contact me at 271-4320.

Sincerely,

Gilbert M. Wistar

Gil Wistar
Hazardous Materials Specialist

cc: Larry Braybrooks, Aegis Environmental Consultants (801 Riverside Ave., Suite C, Roseville, CA 95678)
Mike Koepke, Albany Fire Dept.
Lester Feldman, San Francisco Bay RWQCB
Rafat Shahid, Asst. Agency Director, Environmental Health
files

ALAMEDA COUNTY
HEALTH CARE SERVICES
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DAVID J. KEARS, Agency Director

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

November 20, 1990

Mr. Clayton Johnson
E.C. Buehrer, Inc.
1061 Eastshore Hwy.
Berkeley, CA 94710

Re: **Hydrogelogic investigation report for Buehrer Albany facility, submitted by Aegis Environmental Consultants**

Dear Mr. Johnson:

The Alameda County Department of Environmental Health, Hazardous Materials Division has reviewed the above report, dated June 12, 1990. This report conveys the results and recommendations resulting from work performed at the site in April 1990. In summary, the data indicates that: 1) there is significant shallow soil contamination around the four borings that were converted to monitoring wells; 2) except for the diesel found, this hydrocarbon contamination appears to result from on-site activities; 3) groundwater in all four monitoring wells is contaminated with gasoline, diesel, and/or BTEX; and 4) the "zero lines" of soil and groundwater contamination have not been defined.

Based on this information, we are requiring that Buehrer, Inc. take the following general actions.

1. Define the horizontal extent of shallow soil contamination, and remediate it so that this soil will cease to be an ongoing source of pollution to groundwater. This may result in the need to destroy some or all of the existing monitoring wells.

2. Install additional monitoring wells to define the plume of dissolved hydrocarbons beneath the site. In this regard, the locations of wells that Aegis recommends in Fig. 6 of its June 1990 report are insufficient, because additional downgradient wells are needed, extending, if necessary, off-site.

3. Implement quarterly monitoring of all wells at the site, as outlined in previous letters from this office to Buehrer. All wells should have been sampled in July 1990, and must be resampled immediately. Then, from the date of the next sampling, all wells will need to be sampled on a 90-day rotation.

With regard to the remaining underground tank at the facility, please submit a copy of the 1990 precision test to this office. Our records indicate that the last precision test on this tank was conducted in

September 1989. In addition, please submit copies of daily inventory reconciliation records for this tank for the past 60 days (September 19 to November 19). State law requires that underground tank operators send to the administering agency summaries of inventory reconciliation records every quarter. We have no such records in our files.

Based on the above discussion, please prepare a work plan for additional subsurface investigation to be submitted to this office no later than **December 21, 1990.** Copies of the proposal must also be sent to the Regional Water Quality Control Board in Oakland (attention: Lester Feldman). By this same date, we are requiring that Buehrer send to this office documents on the existing underground tank, as discussed above. Finally, please remit a deposit of $400 with these other materials, made out to Alameda County. Existing funds on deposit for this project are nearly depleted. Authorized by Sec. 3-141.6 of the Alameda County Ordinance Code, these funds will cover our continuing oversight of the project, and will be drawn upon at an hourly rate.

Because we are overseeing this site under the designated authority of the Water Board, this letter constitutes a formal request for technical reports, per Sec. 13267(b) of the California Water Code. Failure to respond in a timely manner could result in civil liabilities under the Water Code of up to $1,000 per day. Other violations of California law may also be cited.

If you have any questions about this letter or about remediation requirements established by the RWQCB, please contact me at 271-4320.

Sincerely,

Gilbert M. Wistar

Gil Wistar
Hazardous Materials Specialist

cc: Pat Wright, Aegis Environmental Consultants (801 Riverside Ave., Suite C, Roseville, CA 95678)
Mike Koepke, Albany Fire Dept.
Lester Feldman, San Francisco Bay RWQCB
Rafat Shahid, Asst. Agency Director, Environmental Health
files

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ALAMEDA COUNTY
HEALTH CARE SERVICES
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DAVID J. KEARS, Agency Director

R01096

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

Certified Mailer #:P 062 127 675

October 6, 1989

Mr. Clayt Johnson
Buehrer, Inc.
1061 Eastshore Hwy.
Berkeley, CA 94710

NOTICE OF VIOLATION, Buehrer, Inc. Albany facility

Dear Mr. Johnson:

On July 26, 1989, the Alameda County Department of Environmental Health, Hazardous Materials Division, sent you a letter regarding the contamination found during the removal of two underground tanks from the above facility. In that letter, we requested that you submit a work plan to this office by September 1, 1989. As of the date of this letter, we have not received a plan to characterize soil and groundwater, nor have we received any communication regarding this issue. Therefore, this letter constitutes a second notice that a work plan and the preliminary assessment resulting from this plan are due. In addition, this office has not received an Unauthorized Release Report, as requested in the July 26 letter; this form must be filled out and sent to this office immediately.

According to Sec. 25298 of the California Health and Safety Code, underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge. Buehrer, Inc. is in violation of this section of the Code, for which Sec. 25299 specifies civil penalties of up to $5,000, for each day the violation continues. Failure to furnish technical reports regarding documented groundwater contamination also violates Section 13268 of the California Water Code, and the Regional Water Quality Control Board can impose fines of up to $1,000 per day.

Please submit a work plan for the Buerher facility to this office by **Friday, November 3, 1989.** A report describing the results of work performed at the site is due exactly five weeks after this date. The work plan should be designed to accomplish the objectives listed on the enclosure sent in the July 26 letter. In summary, the preliminary assessment must address the potential for contamination to have affected both soil and groundwater in the vicinity of the former tank pit. No soil samples appear to have been collected at the time of tank removal, so there is currently no information on soil concentrations of hydrocarbons. Monitoring wells will also be

required. You will need to secure the services of a professional consultant to address these issues.

Should you have any questions about this letter or about remediation requirements established by the RWQCB, please contact the undersigned, at 271-4320.

Sincerely,

Gil Wistar
Hazardous Materials Specialist

cc: Mike Koepke, Albany FD
Doug Krause, DOHS
Lester Feldman, San Francisco Bay RWQCB
Gil Jensen, District Attorney, Alameda County Consumer and Environmental Protection Division
Ed Howell, Acting Chief
files

SITE: 1061 Eastshore Hwy.
Albany, CA

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

R01096

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

July 26, 1989

Mr. Clayt Johnson
Buehrer, Inc.
1061 Eastshore Hwy.
Berkeley, CA 94710

Re: March 1988 sampling results from removal of underground storage tanks, Buehrer, Inc. facility, Albany

Dear Mr. Johnson:

Thank you for sending sampling results to this office per the request of Gil Wistar of my staff. Judging by the notations in the project file, these analytical data were apparently never received by our office. After our review of the results, we have determined that contaminants above regulatory thresholds were present at the time of tank removal, and that Buehrer must conduct a preliminary assessment to determine if contamination has spread, and if so, how far.

The San Francisco Bay Regional Water Quality Control Board (RWQCB) has established contaminant thresholds for soil and water samples above which large releases of hydrocarbons are likely to have occurred. For soil samples taken during underground tank removal this level is 100 ppm. For water samples (required to be collected if water is standing in the tank pit), the threshold is "non-detect"; that is, <u>any</u> hydrocarbons detected in groundwater are judged to be evidence of large releases. Title 23 of the California Code of Regulations requires all such releases from underground tanks to be reported. An unauthorized release report (blank copy enclosed) must therefore be filed with this office within five days of the date of this letter; in addition, as mentioned above, you must initiate investigation and/or cleanup activities at this site.

The preliminary assessment should be designed to determine the extent of soil and groundwater contamination that has resulted from the leaking tank(s). The information gathered by this investigation will be used to assess the need for additional actions at the site. The assessment should provide all of the information, in the format shown, in the attachment at the end of this letter. This format is based on RWQCB guidelines. You should be prepared to install one monitoring well, if you can verify the direction of groundwater flow in the immediate vicinity of the site, and three wells otherwise.

Until cleanup is complete, you will need to submit reports to this office and to the RWQCB every three months (or at a more frequent interval, if specified at any time by either agency). These reports should include information pertaining to further investigative results; the methods and costs of cleanup actions implemented to date; and the method and location of disposal of any contaminated material.

Soils contaminated at hazardous waste concentrations should be transported by a licensed hazardous waste hauler and disposed of or treated at a facility approved by the California Department of Health Services. Soils contaminated below the hazardous waste threshold may be managed as nonhazardous, but are still subject to the RWQCB's waste discharge requirements.

Your work plan should be submitted to this office by **September 1, 1989.** Copies of the proposal should also be sent to the RWQCB (attention: Dyan Whyte). You may implement remedial actions before approval of the work plan, but final concurrence by this office will depend on the extent to which the work done meets the requirements described in this letter.

If you have any questions about this letter or about remediation requirements established by the RWQCB, please contact Gil Wistar, Hazardous Materials Specialist, at 271-4320.

Sincerely,

Rafat A. Shahid

Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:GW:gw

enclosures

cc: Howard Hatayama, DOHS (w/o enclosures)
Dyan Whyte, San Francisco Bay RWQCB (w/o enclosures)
Gil Jensen, District Attorney, Alameda County Consumer and Environmental Protection Agency (w/o enclosures)
files

R01096

WORK PLAN REQUIREMENTS FOR AN INITIAL SUBSURFACE INVESTIGATION

This outline should be followed by professional engineering or geologic consultants in preparing work plans to be submitted to the RWQCB and local agencies. Work plans must be signed by a California-registered engineer or geologist.

This outline should be referred to in context with the "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks" (June 2, 1988).

PROPOSAL FORMAT

I. Introduction

A. State the scope of work

B. Provide information on site location, background, and history

1. Describe the type of business and associated activities that take place at the site, including the number and capacity of operating tanks.

2. Describe previous businesses at the site.

3. Provide other tank information:

- number of underground tanks, their uses, and construction material;

- filing status and copy of unauthorized release form, if not previously submitted;

- previous tank testing results and dates, including discussion of inventory reconciliation methods and results for the last three years.

4. Other spill, leak, and accident history at the site, including any previously removed tanks.

II. Site Description

A. Describe the hydrogeologic setting of the site vicinity

B. Prepare a vicinity map (including wells located on-site or on adjoining lots, as well as any nearby streams

C. Prepare a site map

D. Summarize known soil contamination and results of excavation

1. Provide results in tabular form and indicate location of all soil samples (and water samples, if appropriate). Sample dates, the identity of the sampler, and signed laboratory data sheets need to be included, if not already in possession of the County.

2. Describe any unusual problems encountered.

3. Describe methods for storing and disposing of all contaminated soil.

III. Plan for Determining Extent of Soil Contamination

A. Describe method for determining the extent of contamination within the excavation

B. Describe sampling methods and procedures to be used

1. If a soil gas survey is planned, then:

- identify number of boreholes, locations, sampling depths, etc.;

- identify subcontractors, if any;

- identify analytical methods;

- provide a quality assurance plan for field testing.

2. If soil borings are to be used to determine the extent of soil contamination, then:

- identify number, location (mapped), and depth of the proposed borings;

- describe the soil classification system, soil sampling method, and rationale;

- describe the drilling method for the borings, including decontamination procedures;

- explain how borings will be abandoned.

C. Describe how clean and contaminated soil will be differentiated, and describe how excavated soil will be stored and disposed of. If on-site soil aeration is to be used, then describe:

1. The volume and rate of aeration/turning;

2. The method of containment and cover;

3. Wet-weather contingency plans;

4. Results of consultation with the Bay Area Air Quality Management District.

Other on-site treatments (such as bioremediation) require permits issued by the RWQCB. Off-site storage or treatment also requires RWQCB permits.

D. Describe security measures planned for the excavated hole and contaminated soil

IV. Plan for Characterizing Groundwater Contamination

Construction and placement of wells should adhere to the requirements of the "Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks."

A. Explain the proposed locations of monitoring wells (including construction diagrams), and prepare a map to scale

B. Describe the method of monitoring well construction and associated decontamination procedures

1. Expected depth and diameter of monitoring wells.

2. Date of expected drilling.

3. Locations of soil borings and sample collection method.

4. Casing type, diameter, screen interval, and pack and slot sizing technique.

5. Depth and type of seal.

6. Development method and criteria for determining adequate development.

7. Plans for disposal of cuttings and development water.

8. Surveying plans for wells (requirements include surveying to established benchmark to 0.01 foot).

C. Groundwater sampling plans

1. Water level measurement procedure.

2. Well purging procedures and disposal protocol.

3. Sample collection and analysis procedures.

4. Quality assurance plan.

5. Chain-of-custody procedures.

V. Prepare a Site Safety Plan