

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



November 17, 1989

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

Mr. John Moe  
Southern Pacific Co.  
One Market Plaza  
San Francisco, CA 94105

Re: Plan of Action for 744 High Street, Oakland

Dear Mr. Moe:

This letter records the recent conversation I had with Mr. Colin Moy of Ecology and Environmental (E&E), where the Plan of action for the Southern Pacific property located at 744 High Street in Oakland was reviewed. As discussed, E&E's general approach to site clean up is acceptable. The following points, though, need further clarification or must be incorporated into the work plan.

1. E&E's opinion that TPH levels are more appropriate indicators of soil contamination, for this facility, than TOG levels is acceptable to the County as long as it is understood that all areas with TPH or TOG contamination will be remediated. An action limit of 100 ppm, and not 1,000 ppm, is required by the SFRWQCB guidelines.
2. E&E's proposed approach to further evaluate the level of PCBs in soil in the areas of boring B-2 and C is acceptable. The results of "subsequent analysis of individual samples" from area C if available should be submitted to this office. The use of a modified EPA method 608 as a cost saving measure is acceptable under the following conditions:
  - A) The results will be considered qualitative, and the discovery of any levels of PCBs will result in the evaluation of the sampling point by EPA method 8080.
  - B) The screening results will be confirmed by analysis by EPA method 8080. A minimum of one confirmation run per five screens will be conducted.
3. E&E's proposal to set the State's TTLC limit for Lead as the site's action level is acceptable.
- 7 4. E&E's proposal for further ground water evaluation needs clarification. In discussing the contents of this section with Mr. Moy it became apparent part of it was written incorrectly.

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5. E&E's proposal to install three additional monitoring wells is acceptable. The proposed locations appear to meet the concerns of the SFRWQCB.

With the inclusion of the noted additions or corrections to the Plan of Action for Phase two Characterization of this site, the County accepts the plan.

If you have any questions concerning the contents of this letter or the status of this case please feel free to call me.

Sincerely,

Ariu Levi, Hazardous Materials Specialist  
Alameda County Environmental Health

cc: Gil Jensen, Alameda County District Attorney's Office,  
Consumer and Environmental Protection  
Rafat Shahid, Assistant Agency Director  
Hussain Kazemi, SFRWQCB  
Howard Hatayama, SDHS  
Mr. Hollander