ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY DAVID J. KEARS, Agency Director

R01176

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

February 28, 1994

Mr. John Goldstein Plants Unlimited 16450 Kent Ave. San Lorenzo, CA 94580

STID 3761

Investigations at 16450 Kent Ave., San Lorenzo, CA Re:

Dear Mr. Goldstein,

This office has received and reviewed Tank Protect Engineering's quarterly report, dated February 1, 1994, for the above site. A minimum of two additional quarterly ground water monitoring events, and continued monthly water level measurements and corresponding gradient determinations are required.

Additionally, in Tank Protect's report, it states that borings were drilled adjacent to the three monitoring wells on January 20, 1993, and one soil sample was collected from each of these borings. Please clarify whether these boring samples were used to represent the required soil samples from Wells MW-1 through Additionally, please submit a figure showing the locations MW-3. of these borings.

Having reviewed Evax's well installation report again, it was noted that no well survey information was submitted with that According to Evax's report, the wells were surveyed to report. Mean Sea Level (MSL). Please submit the documentation showing that the wells were surveyed to MSL with the next quarterly report.

Lastly, our case files do not contain details on the extent of overexcavation that took place (please give tank pit dimensions of the initial and final excavation), on the depths of the initial and confirmatory soil samples, and the amount of excavated soil resulting from the overexcavation. It is the understanding of this office that approximately 6 cubic yards of soil was generated from the initial tank removal/excavation, and hauled off to Zanker Road in San Jose. Please confirm whether or not this is the case, and address the above issues in the next quarterly report.

Mr. John Goldstein Re: 16450 Kent Ave. February 28, 1994

Page 2 of 2

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc:

John Mrakovich

Tank Protect Engineering

2821 Whipple Road

Union City, CA 94587-1233

Edgar Howell-File(JS)

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

R01176

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

DAVID J. KEARS, Agency Director

November 22, 1993

Mr. John Goldstein Plants Unlimited 16450 Kent Ave. San Lorenzo, CA 94580

STID 3761

Re: Investigations at 16450 Kent Avenue, San Lorenzo, CA

Dear Mr. Goldstein,

This office sent you a letter on September 20, 1993, requiring that you resume quarterly ground water monitoring at the above site, and submit a quarterly ground water monitoring report by mid-October 1993. To this date, this office has received no quarterly report. Per a conversation between Ms. Goldstein and myself on November 22, 1993, you have been receiving bids from prospective consultants and have finally narrowed down the choices to one or two consultants.

You are required to conduct quarterly ground water monitoring at the site and submit a quarterly report to this office within 45 days of the date of this letter. This is a formal request for quarterly reports pursuant to Section 2652, Article 5, Title 23 California Code of Regulations.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Edgar Howell-File(JS)

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

DAVID J. KEARS, Agency Director

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

September 20, 1993

Mr. John Goldstein Plants Unlimited 16450 Kent Ave. San Lorenzo, CA 94580

STID 3761

Re: Investigations at 16450 Kent Avenue, San Lorenzo, CA

Dear Mr. Goldstein,

Per our conversation on September 20, 1993, quarterly ground water monitoring at the site was temporarily discontinued due to the disbandment of Evax Technologies, your former consultants. This office has only received on quarterly ground water monitoring report to date, dated February 17, 1993. It is the understanding of this office that quarterly ground water monitoring will resume shortly. The next quarterly ground water monitoring report will be due to this office within 45 days of the date of this letter. Monthly water level measurements and corresponding gradient determinations shall also resume.

Lastly, in March 1993, this office required that the analysis for diesel be included in the quarterly sampling event. However, since that time, it has been noted that soil samples collected from the site's tank removals were analyzed for and did not detect any diesel. Therefore, you will only be required to analyze for Total Petroleum Hydrocarbons as gasoline and benzene, toluene, ethylbenzenes, and xylenes in the following quarterly sampling events.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Edgar Howell-File(JS)

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

DAVID J. KEARS, Agency Director

R01176

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

March 2, 1993

Mr. John Goldstein Plants Unlimited 16450 Kent Ave. San Lorenzo, CA 94580

STID 3761

Re: Investigations at 16450 Kent Avenue, San Lorenzo, CA

Dear Mr. Goldstein,

Thank you for Evax Technologies' Well Installation and Sampling report, dated February 17, 1993. Although the analysis of ground water samples, collected from the newly installed wells, did not identify any Total Petroleum Hydrocarbons as gasoline (TPHg), or benzene, toluene, xylenes, or ethylbenzenes (BTEX), quarterly monitoring is required to continue for a minimum of four quarters before this site can be considered for closure. However, it is acceptable to this office that you switch to quarterly water level measurements after the first three monthly water level measurements.

Lastly, it was noted that although there was formerly a diesel/heating oil underground storage tank at the site, none of the samples were analyzed for diesel. Please include the analysis for diesel in the next quarterly sampling event using the appropriate analysis method given in Table 2 of RWQCB's <u>Staff Recommendations for the Evaluation and Investigations of Underground Storage Tanks</u>. If no diesel is detected in these samples, you may discontinue the analysis for this constituent in the following quarterly sampling events.

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

Mr. John Goldstein Re: 16450 Kent Avenue March 2, 1993 Page 2 of 2

cc: Richard Hiett, RWQCB

Samuel Hong EVAX Technologies, Inc. 269 Mount Hermon Road, Ste. 101 Scotts Valley, CA

Edgar Howell-File(JS)

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

RAFAT A. SHAHID, Assistant Agency Director

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

June 19, 1992

Ms. Nancy Goldstein Plants Unlimited √16450 Kent Ave. San Lorenzo, CA 94580

STID 3761

RE: Ground water Investigation Requirements

Dear Ms. Goldstein,

On July 31, 1990, two underground storage tanks (USTs), one 1,500gallon diesel tank and one 280-gallon gasoline tank, were removed from the above site. A small hole was observed in the gasoline tank during its removal. Soil samples were collected from the tank pits and analyzed. One soil sample collected from beneath the gasoline tank exhibited concentrations of Total Petroleum Hydrocarbon (TPH) as gasoline at 2,300 parts per million. Subsequent to this soil sampling effort additional soil excavation occurred and confirmatory soil samples did not contamination above detection limits. However, due to the high concentration of TPH initially detected in the gasoline tank pit and the fact that ground water is separated from the contamination by less than 20 feet, this office is requesting that additional soil and ground water investigations be conducted at the site.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) require that a soil and ground water investigation be conducted whenever an unauthorized release of product is suspected from an underground storage tank. The hole discovered in the gasoline UST, the levels of soil contamination associated with this tank, and the shallow ground water beneath the site would indicate that such an event may have occurred. This office sent you a letter in May 1991 requesting you to conduct further investigations associated with the former UST at your site, however, to this date, we have not received any response from you.

You are required to conduct a Preliminary Site Assessment (PSA) to determine the lateral and vertical extent and severity of latent soil and ground water contamination which may have resulted from the release at the site. The information gathered by the PSA will

Ms. Nancy Goldstein RE: 16450 Kent St. June 17, 1992 Page 2 of 4

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 Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, the State Water Board's LUFT Manual, 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 quidelines include, but are not limited to, the following:

- o At least one ground water monitoring well mist be installed within 10 feet of the gasoline tank pit, oriented in the confirmed downgradient direction relative to ground water flow. The ground water gradient for a given site is to be determined by data derived from three wells placed in a triangular form (Ground water gradient information may often be derived from previous work conducted on neighboring sites). During the installation of these wells soil samples are to be collected at 5-foot depth intervals and any significant changes in lithology until ground water is reached.
- 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. Additionally, ground water elevations are to be measured monthly for 12 consecutive months and then quarterly thereafter. Groundwater samples are to be collected and analyzed quarterly. Both soil and groundwater 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.

In order to proceed with a site investigation, you should obtain professional services of a reputable environmental consultant. Your responsibility is to have the consultant submit for review a PSA proposal outlining planned activities pertinent to meeting the criteria broadly outlined in this letter and the attached Appendix A.

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

Ms. Nancy Goldstein RE: 16450 Kent St.

June 17, 1992 Page 3 of 4

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 groundwater.

The PSA proposal is due within 45 days of the date 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.

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 groundwater contamination characterization
- o Interpretation of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.
- Recommendations or plans for additional investigative work of remediation

All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. Please include a statement of qualifications for each lead professional involved with this project.

Ms. Nancy Goldstein RE: 16450 Kent St. June 17, 1992 Page 4 of 4

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a late response will result in the referral of this case to RWQCB for enforcement action, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or RWQCB.

The need for any follow-up investigative or remedial actions at this site will be based upon the data derived from the initial investigations.

If you have any questions or comments, please contact Juliet Shin at (510) 271-4320.

Sincerely,

Scott Of Seery, CHMM

Senior Hazardous Materials Specialist

Attachment

cc: Richard Hiett, RWQCB

Richard Quarante, Alameda Fire Dept.

Mark Thompson, Alameda County District Attorney's Office

Edgar Howell-File (JS)

May 7, 1991

John Goldstein Plants Unlimited 16450 Kent Av. San Lorenzo CA 94580 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

RE: Groundwater Investigation Requirements

Dear Mr. Goldstein:

I am writing as a follow up to our recent telephone conversation during which we discussed the need for an investigation of groundwater contamination at your site. This work will be required for the following reasons:

Groundwater is shallow at your site.

- 2. Contamination was separated from groundwater by less than 20 feet.
- 3. Little is known about soil and groundwater conditions found at your site.
- 4. While sampling results indicate that contamination may have been localized, a hole was observed in the side of the tank when it was removed. It is impossible to say how long the hole existed and how long fuel was leaking from the tank at your site. Also, a limited number of soil samples were taken at your site, and a myriad of pathways exist by which leaked or spilled fuel could work its way from the tank through the soil.

You are required to investigate the full extent of petroleum contamination affecting groundwater at and beyond your site. You must submit a work plan to this office by June 30, 1991. The work plan must, at a minimum, address the items listed on Attachment 1 (enclosed). All work must be performed according to the guidelines found in the Regional Board Staff Recommendations for Initial Evaluation and Investigation of Underground Tanks and the Leaking Underground Fuel Tank Manual. Copies of these documents can be obtained from the RWQCB office in Oakland.

At a minimum, you must install three groundwater monitoring wells onsite. Wells must be sampled and samples chemically analyzed monthly for a minimum of three months. After three consecutive months of sampling, all monitoring wells must be sampled at least quarterly for a minimum of one year. You must monitor and chemically analyze for TPH as gasoline and BTEX components.

A groundwater gradient map must be developed for the site. A technical report must be submitted within three months of the

John Goldstein Plants Unlimited May 7, 1991 Page 2 of 2

time that the first sampling results are available. This report must present and interpret the information generated during the initial subsurface investigation. All reports and proposals must be signed by a qualified person as described in RWQCB guidelines. All proposals, reports, and analytical results pertaining to this investigation and site remediation must be sent to this office and to:

Richard Hiett RWQCB 2101 Webster St., 4th Floor Oakland CA 94612

I strongly recommend that you submit your work plan for review to this office **before** beginning work at the site.

Your original deposit for project oversight by this office has been exhausted. Please submit a check for \$350, payable to County of Alameda, in order to cover continued oversight costs. You may contact me with any questions at (415)271-4320.

Sincerely,

Pamela J. Evans

Hazardous Materials Specialist

Enclosure

c: Richard Hiett, RWQCB

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

September 17, 1990

John Goldstein Plants Unlimited 16450 Kent Av. San Lorenzo CA 94580 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

RE: Stockpiled Soil from Underground Tank Removal

Dear Mr. Goldstein:

This letter is a follow up to our telephone conversation today and addresses your questions concerning the following issues:

- 1. Soil from pile 2 (from former diesel pit) did not show contamination above action limits and may be used to refill the excavations.
- 2. Soil from pile 1 (from former gasoline tank) showed oil and grease contamination at 56 ppm. This level is too high to allow for immediate use of the soil as backfill. You may dispose of this soil at a sanitary landfill and must provide documentation of your disposal method to this department. This information must be submitted as part of your site closure report, due September 31, 1990.
- 3. Because high levels of TPH as gasoline were found in a localized area of the gasoline pit, you ordered further excavation and testing of the pit walls. Native soil samples did not show detectable levels after the second excavation. However, the TPH levels in the excavated soil must be characterized so that a disposal decision can be made. You stated today that this soil had been stored separately from other stockpiled soil and agreed to have it sampled. Please submit the sample results and disposal plans to this office.

As we discussed today, any additional requirements by this office would be based on Scott Company's final report. In the meantime, you may call me with any questions at 271-4320.

Sincerely,

Pamela J. Evans

Hazardous Materials Specialist

c: Richard Hiett, Regional Water Quality Control Board Jay Groh, Scott Company