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) 271-4330

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StID 3200

July 19, 1993

Mr. Sumadhu Arigala
S.F. Bay RWQCB
2101 Webster St., Suite 500
Oakland, CA 94612

Subject: Site Closure for Associated Concrete, 1901 Isabel Ave., Livermore, CA 94550

Dear Mr. Arigala:

This office has completed review of the case file for the above referenced site to determine if the site is ready for case closure.

In March 1991, two double-walled USTs (one diesel, one gasoline) were removed from the referenced site. Soil samples taken from native soils beneath the tanks exhibited up to 2.9 ppm TPH-G and did not detect any TPH-D or BTEX. However, rain water had entered the pit before the tank removal procedure was completed. A water sample analyzed showed elevated levels of gas and diesel fuel products. The analytical results from the stockpiled soil exhibited up to 2,000 ppm TPH-D.

A preliminary site assessment commenced in June 1991 with the advancement of three soil borings to a depth of 25-28 feet within the former UST pit to a depth ranging from 15-28 feet. Laboratory analyses of soil samples taken from the soil borings did not detect TPH-G, TPH-D, or BTEX above the MDL.

Sixty cubic yards of excavated soil, split into two piles, were bioremediated on site. The smaller pile, approximately 20 cubic yards, was later used onsite for road grading after laboratory analysis showed the soil did not contain any diesel contamination. The other 40+ cubic yards was later hauled to Vasco Landfill for disposal.

Because active groundwater pumping occurs at the nearby Lonestar Gravel Pits, groundwater flow direction at this site appears to be toward the north and northwest. Depth to groundwater is approximately 100 feet below ground surface.

From my review of the data presented, it appears that most of the fuel contaminated soil was removed from the former UST pit at the time of the tank removal. There is at least 50 feet of soil separating the groundwater table and the last detected hydrocarbons in soil, therefore, the installation of a groundwater monitoring well was not required.

It is my opinion that this case should be reviewed by the RWQCB for case closure. Please contact me at (510) 271-4530 should you need a copy of any reports pertaining to this site, or if you need additional information.

Sincerely,

eva chu
Hazardous Materials Specialist

cc: Nick DeFeo, Associated Concrete Products, 1901 Isabel Ave., Livermore, CA 94550
Danielle Stefani, Livermore Fire Department
Bradd Stately, RMC Lonestar, 4750 Norris Canyon Rd., San Ramon, CA 94583
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DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

March 28, 1991

Mr. Alan Redeker
Associated Concrete Products
1901 Isabel Ave.
Livermore, CA 94550

RE: **Site investigation and remediation requirements following underground tank removals from 1901 Isabel Ave., Livermore**

Dear Mr. Redeker:

As you may recall, on March 20, 1991, Walkers Hydraulics removed two underground storage tanks from the above location. Between the time when concrete was broken and the actual removal, rainfall accumulated in the common tank pit; as a result, a sample of this pit water was collected and sent to the lab for analysis. The lab results of this sample showed elevated levels of both gasoline and diesel fuel. In addition, the analytical results from a composited stockpile soil sample showed very high levels of diesel, indicating that subsurface releases had occurred. Based on this information, the Regional Water Quality Control Board (RWQCB) requires a preliminary contaminant assessment at this site, as we discussed on the phone. Your first step is to file an Unauthorized Release Report with this office immediately. Then, Associated Concrete Products must submit a work plan to us, according to the points raised in this letter and its attachment.

This office will be the lead agency overseeing environmental investigation and cleanup activities at the site. The RWQCB is currently unable to manage the large number of fuel leak cases within Alameda County, and has therefore delegated this authority to our office. However, you must keep the Water Board apprised of all actions taken to characterize and remediate contamination at this site, because the Board retains the ultimate responsibility for ensuring protection of waters of the state.

The preliminary assessment should be designed to determine the extent of soil and groundwater contamination (if any) that resulted from past use of the tanks. The information gathered by this investigation will be used to assess the need for additional actions at the site. <u>The preliminary assessment should be designed to provide all of the information in the format shown in the attachment at the end of this letter</u>, which is based on RWQCB guidelines. One monitoring well will need to be installed within 10 feet and downgradient of the former tanks' location. Alternatively, as we discussed, you may elect to install separate soil borings directly below each tank's fill end, down to the water table or to a 5-foot clay layer, whichever comes first.

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Until remediation 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 must 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 (defined specifically as above 1,000 ppm hydrocarbons) should be transported by a licensed hazardous waste hauler and disposed of or treated at a facility approved by the Calif. 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. Copies of manifests or receipts for all soil and water disposal must be sent to this office.

Please submit a work plan to this office no later than **April 29, 1991.** Copies of the proposal should also be sent to the RWQCB (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 the undersigned at 271-4320.

Sincerely,

Gilbert M. Wistar

Gil Wistar
Hazardous Materials Specialist

enclosure

cc: Howard Hatayama, DOHS
Lester Feldman, San Francisco Bay RWQCB
Rafat Shahid, Asst. Agency Director, Environmental Health
files

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 show 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

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

Certified Mailer # P 062 128 105

December 5, 1990

Mr. Alan Redeker
General Manager, Northern California
Associated Concrete Products
1901 Isabel
Livermore, CA 94550

NOTICE OF VIOLATION

Dear Mr. Redeker:

On November 28, 1990, the Alameda County Department of Environmental Health, Hazardous Materials Division inspected the Associated Concrete Products facility for its compliance with state law in the following areas: 1) management of hazardous wastes; 2) underground storage tanks; and 3) the Hazardous Materials Management Plan (HMMP).

During the inspection, many containers of hazardous waste or hazardous materials were found in the northeast portion of the yard; they consisted of numerous 55-gallon drums and several smaller containers. Many of these containers are in deteriorated condition, evidence of having been left out in the elements for years. Few are labeled properly, and some are missing bungs so that they are open and liable to overflow. Because of this manner of storage of hazardous materials and wastes, some spillage of contaminants has evidently occurred directly to the ground. Such spillage could be construed as on-site disposal of hazardous waste, which violates Section 25189.5 of the California Health and Safety Code (H&SC).

Additionally, the steam-cleaning sump was found to drain directly into surface water beyond the fence on the southern edge of the property, another potential violation of Sec. 25189.5, H&SC. Drainage from this sump should cease immediately; if Associated Concrete Products wishes to continue steam-cleaning on-site, the runoff collection area must be redesigned so that heavy sludges and lighter hydrocarbons can be collected and disposed of as hazardous waste, or recycled in some manner. Then, even assuming it is fully separated from sludges and hydrocarbons, wastewater from the steam-cleaning process can only be discharged into surface waters under a Waste Discharge permit from the San Francisco Bay Regional Water Quality Control Board. Another disposal option for the separated wastewater would be the leach field associated with the septic system currently in use.

During the inspection, there were additional violations of state law, as noted below.

Title 22, California Code of Regulations (CCR)

1. Sec. 66508 - The unidentified hazardous material/waste containers described above have been stored for well over the legal limit of 90 days, and no beginning accumulation dates were marked on any of the drums. Few of these containers were labeled properly.

2. Sec. 67124 - The vessels storing hazardous materials and wastes on the property are arranged in such a way that they could obstruct the movement of fire protection personnel or associated spill control/decontamination equipment in an emergency.

3. Sec. 67241 - As described, many drums and other containers throughout the property are rusted or otherwise in deteriorated condition. Hazardous waste in these drums must be characterized and disposed of immediately. Usable product in these drums, to the extent that there is any, must be transferred to containers in better condition prior to the final disposition of these materials.

4. Sec. 67243 - Many drums and other containers, such as the above-ground waste oil tank, are open, which could allow unauthorized releases of hazardous wastes from spillage or overflow.

5. Sec. 67244 - Associated Concrete Products has failed to carry out regular inspections and maintenance of waste storage areas, which are in poor condition. It appears that drums containing hazardous wastes and materials have been abandoned and left to rot.

6. Sec. 67245 - None of the areas in which waste is stored has a secondary containment system. A required secondary containment system for outdoor hazardous waste storage should have an impervious floor and a berm on all sides. It must also have a capacity of at least 10% of the combined volume of all drums in storage plus at least 3 inches of freeboard for rainfall. In addition, above-ground tanks require 110% containment.

California Health and Safety Code

7. Sec. 25287 - The underground storage tanks at the facility are not properly permitted. It is this office's understanding that Associated Concrete Products intends to remove the underground

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tanks from the facility as soon as possible; if removal occurs in a timely manner, this violation may be rescinded.

8. According to H&SC Division 20, Chapter 6.95, Associated Concrete Products has failed to submit to this office a comprehensive Hazardous Materials Management Plan. The requirements of the HMMP were explained to you during the inspection, and generally must include a thorough hazardous material/waste inventory, employee training information, and contingency procedures to be implemented in the event of a chemical spill or release.

In accordance with Sec. 66328, CCR, Associated Concrete Products must submit a Plan of Correction to this office within 30 days, or by **January 4, 1991.** This plan should specify the actions the company will take to address each of the above violations, and their expected dates of completion. The completed HMMP must also be submitted by this date.

If you have any questions concerning this letter, please contact the undersigned at 271-4320.

Sincerely,

Gilbert M. Wistar

Gil Wistar
Hazardous Materials Specialist

c: Howard Hatayama, DOHS
Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection Division
Rafat A. Shahid, Asst. Agency Director, Environmental Health
files