

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



B-25-02

March 25, 2002  
RO00001603

Ms. Rose Pelino  
Avis Rent-A-Car Systems, Inc.  
6 Sylvan Way  
Parsippany, NJ 07054

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

**Re: Work Plan for Avis Rent-A-Car, 1 Neil Armstrong Way, Oakland CA 94621**

Dear Ms. Pelino:

Our office has received and reviewed the March 14, 2002 Work Plan for Additional Groundwater Investigation at the above referenced Avis facility. We are aware that the underground tank at the site is scheduled for removal in the summer of 2002 and that the proposed work would occur subsequent to this removal. This work is intended to define the extent of the MTBE plume previously identified in a shallow boring investigation. Borings are proposed also to determine if the storm drains onsite may be acting as preferential pathways for contaminant migration. Grab groundwater samples are proposed for collection and analysis for the analytes, TPHg, BTEX and MTBE.

The work plan is approved with the following conditions:

- Although soil samples are not proposed for chemical analysis, vadose soil samples should be screened with a field instrument and analyzed if significant screening results are observed.
- Please provide a rose diagram for groundwater gradient determined from the earlier groundwater investigation performed at the site. There is a need to confirm the assumed east-southeast gradient.
- Please insure that your volatile organics analysis using EPA Method 8260 includes MTBE, the other ether oxygenates and the halogenated volatile organics.
- Please add an additional boring location near the former location of MW-3. This will give an important data point to illustrate the assumed attenuation of MTBE.
- Keep in mind that our office originally requested an off-site investigation, particularly south of the existing tank. Should the results of this investigation not be able to complete your MTBE iso-concentration contours, an off-site investigation will be necessary. The Port of Oakland has pledged its co-operation in allowing off-site access.

Ms. Rose Pelino  
March 25, 2002  
RO00001603  
1 Neil Armstrong Way, Oakland CA 94621  
Avis Rent-A-Car  
Page 2

Please contact our office prior to performing this field work and the tank removal. You may contact me at (510) 567-6765 with any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, files

Mr. K. Johnson, MFG, Inc., 180 Howard St., Ste. 200, San Francisco, CA 94105

Mr. D. Klettke, Port of Oakland, 530 Water St., 2<sup>nd</sup> Floor, Oakland, CA 94607

Wpap1Neil Armstrong

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

February 26, 2002, Agency Director

RO0001603



02-27-02

Ms. Rose Pelino  
Avis Rent-A-Car Systems, Inc.  
900 Old Country Road  
Garden City, NY 11530

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

**Re: Avis Rent-A-Car Facility, 1 Neil Armstrong Way, Oakland, CA 94621**

Dear Ms. Pelino:

This letter serves to recount the 2/13/02 meeting our office had with Mr. Chuck Headlee of the San Francisco Regional Water Quality Control Board (SFRWQCB) and Mr. Dale Klettke of the Port of Oakland. Your consultant was unable to make this meeting, however, I sent him copies of the utility map and a figure with potential boring locations.

The following observations were made at the meeting:

- Upon review of the utility map, both the on-site and off-site storm drains appear to be potential pathways for contaminant migration. Several of the proposed boring locations are meant to investigate these pathways.
- The initial investigation results indicate a recent release from the existing UST. The Water Board will not close this site unless the source of the release has been determined and abated. One obvious option is the removal of the underground tank system.
- The requested investigation must be done to delineate the hydrocarbon plume and investigate the preferential pathways. If possible, it would be ideal to remove the existing UST and perform the investigation immediately thereafter.

**Because of this meeting, you may submit the previously requested work plan no later than March 15, 2002.**

Please contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, files

Mr. Ken Johnson, MFG, Inc., 71 Stevenson St., Ste. 1450, S.F., CA 94105-2941  
Mr. D. Klettke, Port of Oakland, 530 Water St., Oakland, CA 94607

1NeilArmstrong

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



01-22-02  
C. C.

January 18, 2002  
RO0001603

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-8700  
FAX (510) 337-9335

Ms. Rose Pelino  
Avis Rent-A-Car System, Inc.  
900 Old Country Road  
Garden City, NY 11530

**Re: Request for Work Plan for Avis Rent-A-Car, 1 Neil Armstrong Way,  
Oakland CA 94621**

Dear Ms. Pelino:

As you are aware, the oversight of the referenced site has been transferred to Alameda County Environmental Health's Local Oversight Program (LOP) by the City of Oakland Fire Department. You have been notified of this action in the **Notice of Responsibility** letter sent to your attention.

This was done after review of the February 15, 2001 Phase II Investigation Report performed by MFG. In this report, numerous borings were advanced and grab groundwater samples taken for chemical analysis. Of concern were elevated MTBE concentrations detected in groundwater samples down-gradient of the existing 12,000 gallon gasoline tank. It appears that a release from this tank has occurred, not related to the tanks removed in 1989. I have spoke with Mr. Chuck Headlee of the San Francisco Regional Water Quality Control Board (SFRWQCB) and he concurs with our office's opinion as to the need to further delineate the extent of the MTBE plume. **Please submit a work plan perform this investigation to our office within 45 days or no later than March 1, 2002.**

I understand that this site is scheduled for closure, including the removal of the underground tanks, dispensers and hydraulic lifts. It is hoped that the subsurface investigation can be done simultaneously with site closure. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, files

Mr. Ken Johnson, MFG, Inc., 71 Stevenson St., Ste. 1450, S. F., CA 94105-2941  
Mr. D. Klettke, Port of Oakland, 530 Water St., Oakland CA 94607

Wprq1NeilArmstrongWay



December 28, 1993

CERTIFIED MAILER #: P 422 218 188

Avis Rent A Car  
1 Neil Armstrong Way/airport  
Oakland, 94621

UGTID:1103

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

**Re: FIVE-YEAR PERMITS FOR OPERATION OF UNDERGROUND STORAGE TANK(S)  
1 Neil Armstrong Way/airport Oakland, 94621**

Dear Owner/Operator:

According to our records your facility referenced above has not received a five-year permit to operate UST's. In order to obtain a permit you must complete the following items marked below and return them within 30 DAYS. The necessary forms are enclosed. You may complete a "Consolidated Underground Tank Management Plan" which will assist you in preparing a monitoring plan, site plot plan and spill response plan for your tank(s). If supplemental information or forms are required, please submit it to this office with the completed questionnaire and application forms:

- \_\_\_ 1. An accurate and complete plot plan.
- \_\_\_ 2. A written spill response plan. (enclosed)
- \_\_\_ 3. A written tank monitoring plan. (enclosed)
- \_\_\_ 4. Results of precision tank test(s), (initial and annual).
- \_\_\_ 5. Results of precision pipeline leak detector tests (initial and annual).
- \_\_\_ 6. Complete UST PERMIT FORM A-one per facility. (enclosed)
- \_\_\_ 7. Complete UST PERMIT FORM B-one per tank. (enclosed)
- \_\_\_ 8. Complete UST PERMIT FORM C-one per tank if information is available. (enclosed)
- \_\_\_ 9. Letter stating how the tank is to be maintained during one year closure.

Be advised that Title 23 of the California Code of Regulation prohibits the operation of "ANY" UST without a permit. If our records are in error, you must contact this office immediately TO AVOID POSSIBLE ENFORCEMENT ACTION. Please feel free to contact this office at (510) 271-4320; to answer any questions which may arise in completing the mandatory five-year permit process. Be prepared to provide your zip code to speak with the Hazmat Specialist handling your case.

Sincerely,

PAUL SMITH  
HazMat Specialist

c: Edgar Howell, Chief, Hazardous Materials Div. (files)

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R02891

R01603

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

October 31, 1990

Ms. Beth Hamilton  
Pillsbury, Madison & Sutro  
Ten Almaden Boulevard  
San Jose, CA 95113

Dear Ms. Hamilton:

I have reviewed the "Soil and Groundwater Investigation Report" prepared by McCulley, Frick, & Gilman, Inc. (MF&G) dated September 19, 1990, for Avis Rent A Car at 1 Neil Armstrong Way in Oakland. This report describes the investigation that has occurred at the site and describes activities that will be performed based on information provided from the investigation.

Section 8.0 of the report describes the remedial program for the site. This consists of excavating hydrocarbon contaminated soil in the vicinity of Monitoring Well 1 (MW1), and replacing MW1. Of the three wells installed, only soil samples and water samples from MW1 contained hydrocarbons.

I contacted Mr. Ed Conti of MF&G to discuss the placement of the new monitoring well. This well should be placed on the down-gradient side of the final excavation. Once it has been shown that groundwater has been impacted, the next step is to define the extent of the plume. At this point in the Avis investigation, there is no information on where the plume has migrated. According to Mr. Conti, the latest sampling round shows that hydrocarbon levels have decreased considerably; however, only by further groundwater investigation can it be determined if this is indeed a "real" decrease in values, or if we are just seeing the plume migrate past this monitoring point.

In a separate issue, I reviewed the files regarding the removal and installation activities at the Avis facility. We still need a copy of the as-built drawings of the new installation, as requested by Ariu Levi. This was a condition of the installation approval, dated May 2, 1989. I am also in the process of closing out the deposit/refund accounts associated with the removal/installation process. A separate deposit/refund is required to continue with

October 30, 1990  
Avis Rent A Car  
Page 2

oversight of the remediation process. Please submit a check for \$1,200.00, payable to Alameda County Division of Hazardous Materials within 30 days. This amount is to cover the time already used to review the investigation, and to cover additional oversight.

If you have any questions, please call me at 415/271-4320.

Sincerely,



Cynthia Chapman  
Hazardous Materials Specialist

c: Mr. Karl Westermann, Regional Director  
Mr. Steven Luquire, RWQCB  
Mr. Ed Conti, MF&G

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SITE: Neil Armstrong Way,  
Oakland

RO 2891

✓ RO 1603

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

May 31, 1990

Ms. Beth L. Hamilton  
Pillsbury, Madison & Sutro  
Ten Almaden Boulevard  
San Jose, CA 95113

Dear Ms. Hamilton:

Our office has reviewed your letter, dated May 9, 1990, to Ms. Cynthia Chapman, that provides us with an update of activities that are occurring at the Avis facility. Thank you for responding to our questions about the tank removal activities.

The purpose of this letter is to inform you of the San Francisco Regional Water Quality Control Board's (RWQCB) position with regards to the disposition of the remediated stockpiled soils. It is important to note that the RWQCB is concerned with any impact to water quality. What may meet the non-hazardous classification by the DHS may still be considered a threat to water quality by the RWQCB. On-site disposal of hydrocarbon-contaminated soils requires the responsible party to file a Report of Waste Discharge (ROWD) in order for the RWQCB to issue Waste Discharge Requirements (WDR). The resulting on-site disposal would have to be consistent with CCR Title 23, Subchapter 15 requirements for discharges of waste to land, which means treating the site as a closed landfill.

This is a lengthy and expensive process, and the RWQCB staff is currently unable to review and prescribe WDRs for all on-site disposal requests. As a result, the RWQCB has issued a guidance document to all its Lead Implementing Agencies (LIA) that defines the criteria for soil excavated during fuel tank removals to be disposed of on-site without the need for WDRs or Subchapter 15 considerations. These criteria are:

1. One discrete soil sample is taken for every 20 cubic yards of soil for final characterization.
2. Soil analytical results indicate **non-detectable** concentrations of petroleum hydrocarbons and other pollutants of concern. RWQCB defines non-detectable as 10ppm or less, for TPH (both gas and diesel), and for total oil-and-grease.



Avis  
May 31, 1990  
Page 2 of 2

3. Site characteristics such as depth to ground water, ground water use, and soil permeability have been considered and it is determined that the discharge of soil appears to pose a minimal threat to water quality should characterization not prove representative of actual soil pollutant concentrations.
4. Ground water monitoring wells have been installed at the site, and quarterly monitoring will take place for a minimum of one year after soil disposal to verify no threat.
5. The technical reports for the site are properly reviewed and approved by the LIA or RWQCB.

All these criteria must be met for on-site disposal of petroleum contaminated soil. What is pertinent to Avis from these requirements is that discrete samples be taken for every 20 cubic feet of stockpiled soil, and that analyses indicate values equal to or less than 10 ppm before we will allow on-site disposal. The bio-remediation efforts currently in progress at this facility will not be affected by the above listed criteria unless the intent is to dispose of the soil on-site, in which case you need to know about the levels that are acceptable to the RWQCB.

If you have any questions, please call Cynthia Chapman at 415/271-4320.

Sincerely,



for Edgar B. Howell, III  
Chief, Hazardous Materials Division

cc: Mr. Gil Jensen, Alameda County District Attorney  
Mr. Lester Feldman, RWQCB  
Ms. Corey Yup, DHS  
Mr. Karl Westermann, Avis  
Ms. Michele Heffes, Port of Oakland  
Ms. Ann Cuffner, OHM  
Mr. Jim Ritchie, Dames & Moore

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



✓ R01603  
R02891

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

February 26, 1990

Ms. Michele Heffes  
Port Of Oakland  
66 Jack London Square  
Oakland, CA 94604-2064

Dear Ms. Heffes:

This letter is to inform you that we have given Avis Rent-A-Car, located at 1 Neil Armstrong Way, Oakland, a permit for two underground storage tanks.

Currently, Avis has submitted workplans regarding remediation of hydrocarbon contaminated soils and impact to groundwater. Avis is keeping this office informed of on-going work.

If you have any questions regarding this site, please call Cynthia Chapman at (415) 271-4320.

Sincerely,

Edgar B. Howell III  
Acting Chief, HazMat Division

CC:cc

cc: Beth Hamilton, Pillsbury, Madison & Sutro