

## Detterman, Mark, Env. Health

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**From:** Hill, Stephen@Waterboards [Stephen.Hill@waterboards.ca.gov]  
**Sent:** Thursday, August 16, 2012 10:48 AM  
**To:** Chrisk@bwserv.com  
**Cc:** Detterman, Mark, Env. Health; ttreece@ci.san-leandro.ca.us; paul.king@pdenviro.com; Palacehr@sonic.net; MCcaulou, Cherie@Waterboards  
**Subject:** Watkins site - intent to rescind SCR letter  
**Attachments:** 01S0426 (Watkins) - intent to rescind SCR 8-16-12.pdf

Dear Mr. Kirschenheuter – Attached is report approval letter for the subject site. The letter concurs with P&D's conclusion regarding PCE migrating onto your property from an upgradient offsite source. If you have any questions or comments, please contact Cherie McCaulou. She will return to the office on Tuesday, August 21, 2012.  
Cheers, Stephen Hill

Stephen Hill  
Toxics Cleanup Division Chief  
California Regional Water Quality Control Board – SF Bay Region  
1515 Clay Street #1400, Oakland, CA 94612  
(510) 622-2361 or [SHill@waterboards.ca.gov](mailto:SHill@waterboards.ca.gov)

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**San Francisco Bay Regional Water Quality Control Board**

August 16, 2012  
File No. 01S0426 (ccm)

Bluewater Environmental Services, Inc.  
Attn: Chris Kirschenheuter, President  
([chrisk@bwserv.com](mailto:chrisk@bwserv.com))  
P.O. Box 1857  
2075 Williams Street  
San Leandro, CA 94577

**SUBJECT:** Approval of Groundwater and Indoor Air Investigation Report, and Intent to Rescind the Site Cleanup Requirements Order No. 98-120 for the former Freight Terminal Inc. (Watkins) Site, 2075 Williams Street, San Leandro, Alameda County

Dear Mr. Kirschenheuter:

This letter responds to your July 5, 2012, Groundwater and Indoor Air Investigation Report prepared by P&D Environmental Inc. (P&D) on behalf of Bluewater Environmental Services, Inc. (Bluewater) for the above referenced Site. The subject report documents the offsite water quality and subsurface conditions upgradient of the Site and indoor air quality at the Site. The work scope was approved by Regional Water Board staff in a letter dated March 2, 2012. This report is hereby approved.

As discussed below, the report identifies an offsite upgradient source of tetrachloroethene (PCE) and its breakdown products detected at the Site. As a result, the Regional Water Board intends to rescind the Site Cleanup Requirements Order No. 98-120 and issue a "No Further Action Letter" pertaining to the investigation and remediation of PCE and other offsite related pollutants detected at the Site.

The investigative findings are supported in the following documents.

- September 15, 2011, "Data Gap Sample Collection Work Plan," prepared by P&D.
- September 30, 2011, "Geophysical Investigation at 2051 and 2075 Williams Street by JR Associates," prepared by P&D.
- October 10, 2011, "Subsurface (Offsite) Investigation Work Plan," prepared by P&D.
- July 5, 2012, Groundwater and Indoor Air Investigation Report prepared by P&D Environmental Inc.

**Background**

The Site encompasses approximately 5 acres, and is located in a manufacturing and commercial zoned area of San Leandro. The San Francisco Bay is approximately 3,800 feet southeast of the Site. Shallow groundwater underlying the Site occurs at an approximate depth of 12 feet below ground surface (bgs) and flows to the west-southwest under unconfined conditions. Numerous volatile organic compounds (VOC) plumes have been identified in the Site vicinity.

The Site was developed and occupied from 1952 until 1971 by Daco Metal Fabricating Polymer Industries and Monarch Corporation. In 1971, a fire destroyed the main building on the property and the Site remained vacant until 1977. Freight Terminals, Inc. purchased the Site in 1977 and leased it to freight hauling and storage businesses, including Watkins Motor Lines, Inc. Kirsch Investments LLC (owner of Bluewater) bought the property from Freight Terminals, Inc. c/o Watkins Motor Lines in 2001. Freight Terminals, Inc. and Bluewater Environmental Services, Inc., are not known to use, or have used, TCE or PCE in their operations.

In 1998, the Regional Water Board issued Site Cleanup Requirement Order No. 98-120 requiring Freight Terminals Inc. to propose and implement an interim remedial action and propose final remedial actions for PCE and TCE detected at the Site. PCE and its breakdown products, TCE, cis-1,2-DCE, trans-1,2-DCE and vinyl chloride were detected in groundwater underlying the Site during a 1995 environmental due diligence investigation. In 1999, Board staff approved a proposal for installation of 19 passive vapor wells to provide a pathway for progressive vaporization of PCE from groundwater and gradual reduction of the plume.

Soil and groundwater investigations have been conducted at the Site in 1995, 1997, 1998, 2000, 2006, 2010, 2011, and 2012. Long-term semi-annual groundwater monitoring using 11 wells generally occurred since 2000. Protech, a previous consultant, opined in 2009 that the chlorinated solvent impacts likely originated from an upgradient source, based on groundwater sampling conducted at Bluewater's upgradient property boundary.

**Recent Investigations Onsite and Offsite**

In 2010, a remedial investigation was undertaken by Engeo Inc., on behalf of Bluewater to address Board staff's letters of August 24 and October 23, 2009. Engeo's investigation utilized advanced membrane interface probes at 15 onsite locations. An onsite source of PCE was not identified.

In 2011, P&D was retained by Bluewater. P&D evaluated (1) historical offsite upgradient investigation water quality data associated with investigation of the Site; (2) available historical San Leandro Fire Department chemical use information for the Site to determine if PCE was used, stored, or handled at the Site; and (3) available historical offsite investigation reports for the adjacent downgradient and upgradient properties. From review of all available historical subsurface investigation information for the Site and the adjacent properties at 2101, 2051 and 2075 Williams Street, P&D discovered that exploratory borings shown on Site maps prepared by previous consultants were not consistent with the locations shown on the original investigation report. P&D provided accurate figures showing the exploratory borings re-

located to be consistent with the original investigation report. P&D also corrected the locations of wells at the adjacent downgradient property at 2101 Williams Street, which were erroneously located as much as 320 feet away from the actual locations. In addition, P&D sorted out the water quality data and associated water-bearing zones to be consistent with the terminology, "Shallow A-Zone, Deeper A-Zone, and B-Zone," which are three water-bearing zones that have been defined for the nearby property at 1964 Williams Street (a TCE release site with groundwater investigation and remediation located on the north side of Williams Street).

In September 2011, JR Associated conducted a geophysical survey results in onsite and offsite to identify any preferential pathways and to investigate the possibility of offsite sources of PCE. Subsequently, in June 2012, P&D conducted a soil and groundwater investigation at the offsite upgradient property at 2051 Williams Street collect depth-descrete groundwater samples to assess water quality and to verify the lithology identified during the geophysical survey. P&D concluded the following:

1. Historical City Fire Department maps of Site chemical usage shows the chemical Freon as the only halogenated volatile organic compound (VOC) used at the Site.
2. Available City Fire Department records did not show use of PCE at the Site.
3. Laboratory analysis of numerous soil samples collected from across the Site has only identified one soil sample with elevated PCE concentrations that was collected below the seasonally high water table level.
4. A PCE source has not been identified by any historical investigations at the Site.
5. Elevated PCE groundwater concentrations are distributed in the Shallow A-Zone in a southwest-trending lineation interpreted to be a segment of a buried stream channel which extends through the Site, with the Deeper A-Zone showing a similar distribution of PCE in groundwater.
6. The PCE groundwater concentration of 9,500 ug/L encountered in shallow groundwater at boring B25 located at the upgradient property at 2051 Williams Street at a depth of 17 feet in the buried stream channel (identified during the geophysical investigation) is similar to the PCE groundwater concentrations that range from approximately 1,000 ug/L to a maximum of approximately 11,000 ug/L that are encountered in the immediately downgradient area identified as the buried stream channel at the Site.
7. The source of PCE and associated decomposition products detected at the Site originate from the offsite upgradient property located at 2051 Williams Street.

### **Site Indoor Air Sampling**

Three indoor air samples and one ambient air sample were collected from five feet above the floor using SIM-certified Summa canisters with 8-hour flow controllers for EPA-TO-15 analysis. The results were compared to the Regional Board's Environmental Screening Levels (May 2008). Benzene was detected in all indoor air samples at concentrations ranging from 0.30 to 0.41 ug/m<sup>3</sup> which all exceed the May 2008 Table E Indoor Air ESL of 0.14 ug/m<sup>3</sup> for industrial/commercial land use. PCE was also detected at a concentration of 0.96 ug/m<sup>3</sup> in one indoor air sample which exceeded the May 2008 Table E Indoor Air ESL of 0.69 ug/m<sup>3</sup> for industrial and commercial land use. P&D recommended that Bluewater amend facility operations to discontinue repair and testing of gasoline powered equipment in the warehouse.

**Response and Next Steps**

We concur with the findings and conclusion presented in the July 5, 2012, report. The report is hereby approved. Based on information currently available to Regional Water Board staff, we conclude that groundwater pollution detected beneath the Blueawater property/Site is likely the result of the migration of pollutants in groundwater from upgradient sites. In general, the Regional Water Board does not pursue enforcement action against a property owner whose land overlies contaminated groundwater if that contamination is solely the result of the migration of groundwater contaminants from an off-site source or sources. Accordingly, the Regional Water Board intends to take steps to rescind the Order No. 98-120 and issue a “No Further Action Letter” for this site. However, the Regional Water Board may hold such a property owner responsible for investigation or cleanup tasks if he or she refuses to provide reasonable access to an upgradient discharger attempting to investigate and cleanup off-site groundwater pollution.

If you have any questions regarding this letter, please contact Cherie McCaulou of my staff at (510) 622-2342, or e-mail [[cmccaulou@waterboards.ca.gov](mailto:cmccaulou@waterboards.ca.gov)].

Sincerely,

Bruce H. Wolfe  
Executive Officer

cc:

Alameda County Health

Attn: Mark Detterman ([mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))

City of San Leandro Fire Department

Attn: Tiffance Treece, ([ttreece@ci.san-leandro.ca.us](mailto:ttreece@ci.san-leandro.ca.us))

P&D Environmental, Inc.

Attn: Paul King, ([paul.king@pdenviro.com](mailto:paul.king@pdenviro.com))

Palace Towing and Recovery ([Palacehr@sonic.net](mailto:Palacehr@sonic.net))

Attn: Bill Hernandez

2051 Williams Street, San Leandro