

Detterman, Mark, Env. Health

From: MCcaulou, Cherie@Waterboards [Cherie.MCcaulou@waterboards.ca.gov]
Sent: Wednesday, January 27, 2016 4:03 PM
To: chrisk@bwserv.com
Cc: Yoo, James; Detterman, Mark, Env. Health; PDKing0000@aol.com; MCcaulou, Cherie@Waterboards
Subject: 2075 Williams Street, San Leandro. Approval letter for Well Abandonment Work Plan
Attachments: Work Plan well destruction (12-8-15) 2075 Williams.pdf; 01S0426 (Watkins) - approve well destruction WP 1-26-16.pdf

Dear Chris – the attached letter approves your work plan (also attached) for well abandonment prepared by Paul King for the former Watkins Terminal Site at 2075 Williams Street in San Leandro. Please submit the completion report by February 26, 2016. Thank you.

Sincerely,

Cherie McCaulou
Engineering Geologist
California Regional Water Quality Control Board, San Francisco Bay Region
cmccaulou@waterboards.ca.gov
510-622-2342



December 8, 2015
Report 0548.L7

ENVIRONMENTAL SERVICES, INC.

Ms. Cherie McCaulou
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

SUBJECT: WELL DESTRUCTION WORK PLAN CERTIFICATION
Bluewater Environmental Services Inc. (Former Watkins Terminal) Site
RWQCB Case # 01S0426
2075 Williams Street
San Leandro, CA 94577

Dear Ms. McCaulou:

You will find enclosed one copy of the following document prepared by P&D Environmental, Inc.

- Well Destruction Work Plan dated December 8, 2015 (document 0548.W3) for the site located at 2051 Williams Street in San Leandro.

I declare, under penalty of perjury, that the information and/or recommendations contained in the above-mentioned document for the subject site is true and correct to the best of my knowledge.

Should you have any questions, please do not hesitate to contact me at 510-904-3901.

Sincerely,

Bluewater Environmental Services, Inc.

A handwritten signature in black ink, appearing to read "Chris Kirschenheuter", written over a horizontal line.

Chris Kirschenheuter
President

Enclosure

0548.L7

P&D ENVIRONMENTAL, INC.

55 Santa Clara Ave, Suite 240
Oakland, CA 94610
(510) 658-6916

December 8, 2015
Work Plan 0548.W3

Ms. Cherie McCaulou
Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

SUBJECT: WELL DESTRUCTION WORK PLAN
Bluewater Environmental Services Inc. (Former Watkins Terminal) Site
RWQCB Case # 01S0426
2075 Williams Street
San Leandro, CA 94577

Dear Ms. McCalou:

P&D Environmental, Inc. has prepared this work plan for the destruction of thirty wells located at and near the subject site in accordance with an email request for well destruction dated September 22, 2015 from the Regional Water Quality Control Board (RWQCB). The number and type of wells identified for the subject site for destruction are as follows:

- Eleven groundwater monitoring wells designated as MW-1, MW-3, MW-3A, MW-4R, MW-6, post-3/29/2001 MW-10, post-3/29/2001 MW-10A, MW-14, MW-15A, MW-16, and MW-16A.
- Nineteen passive vapor extraction (PVE) wells, most of which were historically unnamed,; and for purposes of this work plan are designated as PVE-1 through PVE-19.

All of the well locations are shown on Figure 1 attached with this work plan, except MW-1 and MW-2 which are located across Williams Street in front of 2048 and 2020 Williams Street, respectively, and are shown on Figure 2 attached with this work plan. The historical wells identified for the site are summarized in Table 1.

P&D personnel visited the site several times in an effort to locate all of the wells. The following historical wells identified on Table 1 were not located for the following reasons.

- MW-2 – The parking lot has been repaved and it appears that a storm drain trench was installed at the location historically identified for this well (see Figure 2). The pavement surface is very uniform, and no evidence of depressions in the surface were observed. Review of Table 1 shows that this well was constructed with 2-inch diameter pipe to a depth of 25 feet.

December 8, 2015
Work Plan 0548.W3

- Wells PVE-6 through PVE-8 (see Figure 1) are identified at locations where a concrete slab is presently located. The concrete slab will be cut and the area beneath the slab will be probed for each of these locations in an effort to locate these wells.
- Pre-3/29/2001 wells MW10 and MW10A. No evidence of the locations of these wells was observed at locations where these wells have been identified on historical maps.

The well destruction methods identified in this work plan were determined based on discussions with Mr. James Yoo of the Alameda County Public Works Agency (ACPWA). All work will be performed under the direct supervision of a California professional geologist.

SCOPE OF WORK

P&D will perform the following tasks:

- Permitting.
- Health and safety plan preparation.
- Arrange for well destruction.
- Arrange for disposal of any soil or water generated during well destruction.
- Report preparation and California Department of Water Resources Well Completion Report preparation.

Each of these is discussed below in detail.

Permitting

Following approval of this work plan by the RWQCB, permits will be obtained from the ACPWA for the destruction of all thirty wells that are numbered in the Well No. column (the first column) of Table 1. The well destruction date(s) will be scheduled with the RWQCB and the permitting agency for inspection of well destruction and borehole grouting procedures in accordance with permit requirements. In addition, offsite access will be requested for destruction of well MW-1 (see Figure 2).

Health and Safety Plan Preparation

A health and safety plan will be prepared for the scope of work identified in this work plan. In addition, the drilling locations will be marked with white paint and Underground Service Alert will be notified for underground utility location.

December 8, 2015
Work Plan 0548.W3

Well Destruction

A summary of well screen intervals is attached with this work plan as Table 1 and a typical well construction diagram for the PVE wells is attached as Appendix A. The typical well construction diagram for the PVE wells is the only available diagram identified in reports associated with the construction of the PVE wells.

All of the wells were constructed using 2-inch diameter PVC pipe, except for monitoring wells MW-3A, post-3/29/2001 MW-10A, MW-15A, and MW-16A which were constructed using 1-inch diameter PVC pipe.

Prior to well destruction, each well will be sounded to verify the depth of the well. Any obstructions encountered in any of the wells will be removed prior to well destruction.

As discussed with Mr. Yoo, wells where the well construction is known and the PVE wells will be destroyed by pressure grouting. The wells that will be destroyed by pressure grouting include the following: MW-1, MW-4R, and PVE-1 through PVE-19 (see Table 1). Similarly, wells where the construction details are not known will be destroyed by overdrilling using 8-inch outside diameter hollow stem augers. The wells that will be destroyed by overdrilling with hollow stem augers are as follows: MW-3, MW-3A, MW-6, post-3/29/2001 MW-10, post-3/29/2001 MW-10A, MW-14, MW-15A, MW-16, and MW-16A.

All materials removed from each borehole will be stored in labeled drums at the site pending proper disposal. All of the well boxes will be removed and disposed of.

Waste Disposal

All materials generated during destruction of the wells will be stored in drums and disposed of at an appropriate disposal facility.

Report Preparation

A report will be prepared documenting the well destruction procedures and results and a copy of the report will be uploaded to GeoTracker. In accordance with California Department of Water Resources requirements, Well Completion Reports will be prepared documenting destruction of the wells and will be provided to ACPWA who will review and forward on to the DWR.

December 8, 2015
Work Plan 0548.W3

Should you have any questions, please do not hesitate to contact us at (510) 658-6916.

Sincerely,



Paul H. King
Professional Geologist #5901
Expires: 12/31/17



Attachments:

Table 1 - Summary of Well Information

Figure 1- Site Vicinity Map Detail Showing Well Locations

Figure 2 - Site Vicinity Map Showing Monitoring Well MW-1 and MW-2 Locations

Appendix A - PVE Well Construction Diagram

Cc: Mr. Chris Kirschenheuter, Bluewater Environmental Services, Inc., 2075 Williams St., San Leandro, CA 94577

PHK/ sjc
0548.W3

TABLES

Table 1
Summary of Well Information

	Borehole	Well	Depth to top of screened	Depth to bottom of screened		Proposed Destruction Method
<u>Well Designation</u>	<u>diameter (Inches)</u>	<u>diameter (Inches)</u>	<u>interval</u>	<u>interval</u>	<u>Notes</u>	
MW-1	8	2	10	25	Well construction obtained from diagram	Pressure Grout
MW-2	8	2	10	25	Well construction obtained from diagram	Pressure Grout
MW-3	Unknown	2	11	26	No boring log or well construction diagram	Over-Drill
MW-3A	Unknown	1	Unknown	60	No boring log or well construction diagram	Over-Drill
MW-4R	8	2	32	47	Well construction obtained from diagram	Pressure Grout
MW-6	Unknown	2	12	27	No boring log or well construction diagram	Over-Drill
Pre-3/29/2001 MW-10	3.25	2	Unknown	25	Relocated, no information regarding destruction	
Pre-3/29/2001 MW-10A	Unknown	1	Unknown	42	Relocated, no information regarding destruction	
Post- 3/29/2001 MW-10	Unknown	2	Unknown	25	No boring log or well construction diagram	Over-Drill
Post- 3/29/2001 MW-10A	Unknown	1	Unknown	41	No boring log or well construction diagram	Over-Drill
MW-14	Unknown	2	10	25	No boring log or well construction diagram	Over-Drill
MW-15A	Unknown	1	Unknown	36	No boring log or well construction diagram	Over-Drill
MW-16	Unknown	2	10	25	No boring log or well construction diagram	Over-Drill
MW-16A	Unknown	1	Unknown	38	No boring log or well construction diagram	Over-Drill
19 Un-Named PVE Wells						
PVE-1 (S1)	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-2	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-3 (MW15)	3.25	2	6	60	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-4	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-5 (S2)	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-6	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-7 (S3)	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-8	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-9	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-10 (S4)	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-11	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-12	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-13	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-14 (S5)	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-15	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-16	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-17 (S6)	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-18	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout
PVE-19	3.25	2	6	41	Well construction obtained from diagram (PVE well)	Pressure Grout

FIGURES

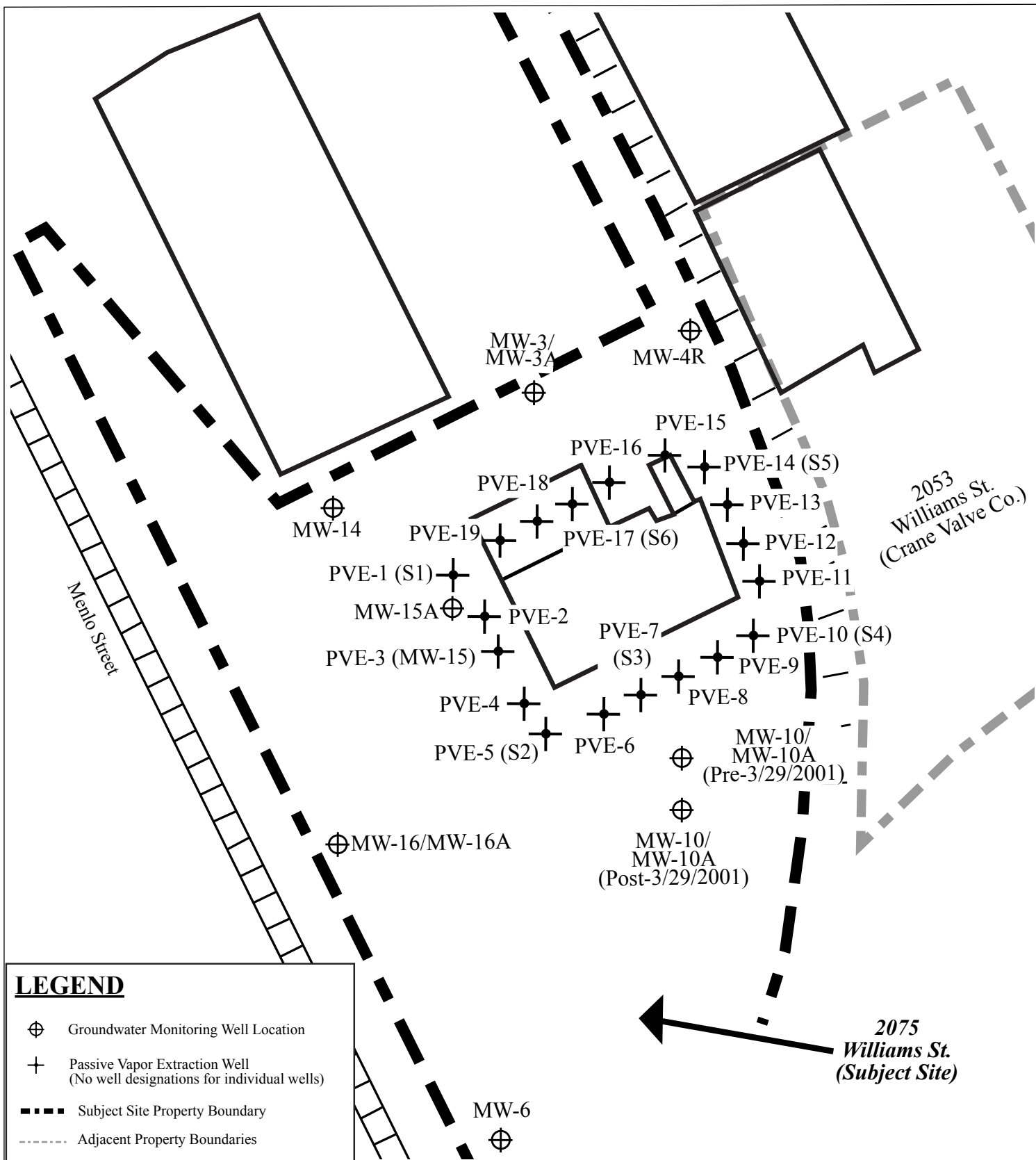
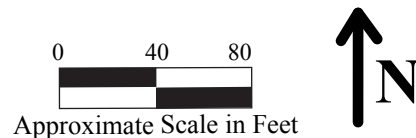


Figure 1
 Site Vicinity Map Detail Showing Well Locations
 2075 Williams Street
 San Leandro, California

Base Map From:
 JR Associates, Geophysical Investigation at
 2051 and 2075 Williams Street San Leandro,
 California 09/30/2011

P&D Environmental, Inc.
 55 Santa Clara Avenue
 Oakland, CA 94610



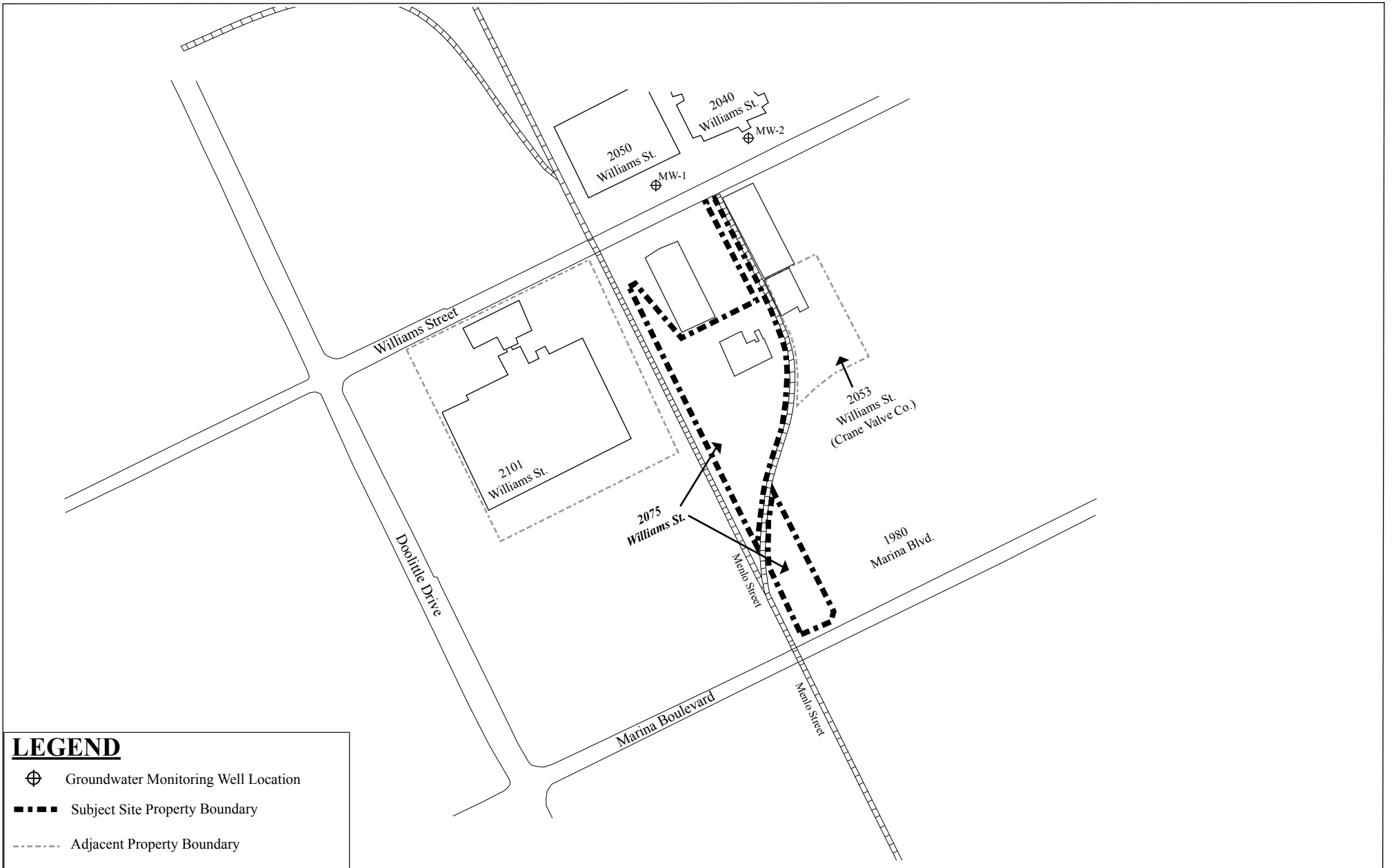
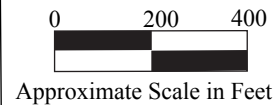


Figure 2
 Site Vicinity Map Showing Monitoring Well MW-1 and MW-2 Locations
 2075 Williams Street
 San Leandro, California

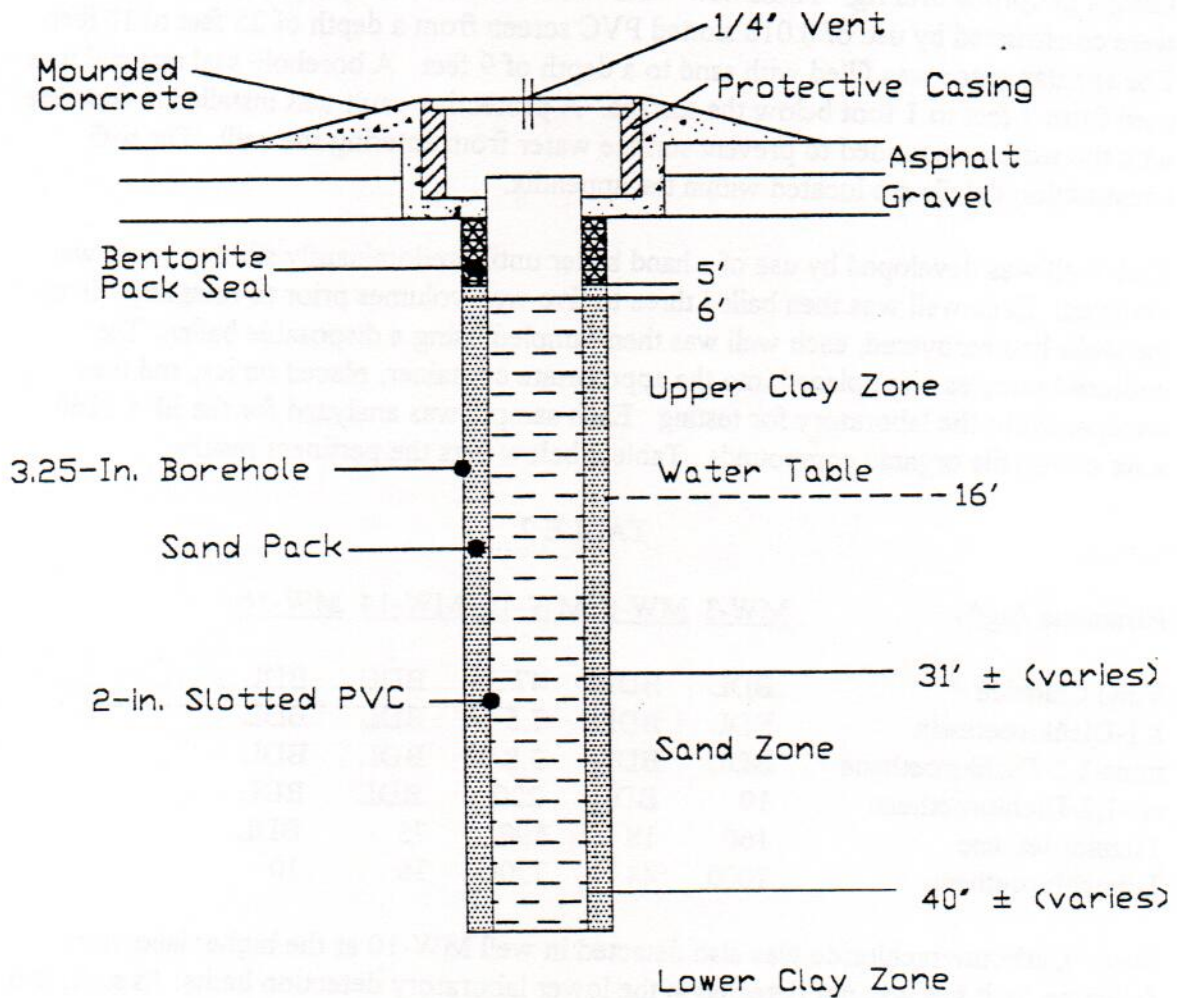
Base Map from:
 Google Earth, October 2009

P&D Environmental, Inc.
 55 Santa Clara Ave., Suite 240
 Oakland, CA 94610



APPENDIX A

PVE Well Construction Diagram



AGI Atlantic Geoscience, Inc.
 Atlanta Highway
 Suite 414
 Athens, GA 30606
 (706) 208-7060

Figure 4
 Vapor Well Construction
 Freight Terminals, Inc.
 AGI Job No. EA-97-001

N.T.S.

San Francisco Bay Regional Water Quality Control Board

January 26, 2016
File No. 01S0426 (ccm)

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

SUBJECT: Approval of Well Destruction Work Plan for the Watkins Terminal (formerly Freight Terminal) Site, 2075 Williams Street, San Leandro, Alameda County

Dear Mr. Kirschenheuter:

This letter responds to your December 8, 2015 work plan for well destruction at the subject site. As explained below, I approve the work plan and require you to submit report documenting successful completion by February 26, 2016.

Background

In July 2015, the Regional Water Board adopted Order No. R2- 2015-0027, which rescinded Site Cleanup Requirements Order No. 98-120. In a July 13, 2015 letter, we required a written report documenting that the monitoring wells and vapor wells have been properly destroyed.

P&D Environmental submitted the work plan on behalf of Bluewater Environmental Services, Inc., the current property owner of the site. The work plan identifies 11 groundwater monitoring wells and 19 passive venting wells for destruction using methods accepted by the Alameda County Public Work Agency, which will be performed under the supervision of a California professional geologist.

Water Board Response

The December 8, 2015 workplan satisfies the requirements of our July 13, 2015 letter. I hereby approve the workplan. This letter requires that you submit a report on well destruction. As explained below, this information will help Regional Water Board staff prepare a no further action letter. You are required to submit a Well Destruction Report by **February 26, 2016**.

This requirement for a report is made pursuant to Water Code Section 13267, which allows the Regional Water Board to require technical or monitoring program reports from any person who has discharged, discharges, proposes to discharge, or is suspected of discharging waste that could affect water quality. The attachment provides additional information about Section 13267 requirements. Any extension in the above deadline must be confirmed in writing by Regional Water Board staff.

In addition to a hard copy you are also required to submit all documents in electronic format to the State Water Resources Control Board's GeoTracker database pursuant to the California Code of Regulations (Title 23, Section 3890 et.seq.). Guidance for electronic information submittal is available at: http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/. Please note that this requirement includes all analytical data, monitoring well latitudes, longitudes, elevations, water depth, site maps, and boring logs (PDF format).

If you have any questions, please contact Cherie McCaulou of my staff at (510) 622-2342 [e-mail cherie.mccaulou@waterboards.ca.gov].

Sincerely,

Bruce H. Wolfe
Executive Officer

Attachment Water Code Section 13267 Fact Sheet

cc w/attach: Alameda County Public Work Agency
Attn: Mr. James Yoo (jamesy@acpwa.org)
399 Elmhurst Street
Hayward, CA 94544

P&D Environmental, Inc.
Attn: Mr. Paul King (PDking0000@aol.com)
55 Santa Clara Avenue, Suite 240
Oakland, CA 94610

San Francisco Bay Regional Water Quality Control Board

Fact Sheet – Requirements for Submitting Technical Reports Under Section 13267 of the California Water Code

What does it mean when the Regional Water Board requires a technical report?

Section 13267¹ of the California Water Code provides that "...the regional board may require that any person who has discharged, discharges, or who is suspected of having discharged or discharging, or who proposes to discharge waste...that could affect the quality of waters...shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires."

This requirement for a technical report seems to mean that I am guilty of something, or at least responsible for cleaning something up. What if that is not so?

The requirement for a technical report is a tool the Regional Water Board uses to investigate water quality issues or problems. The information provided can be used by the Regional Water Board to clarify whether a given party has responsibility.

Are there limits to what the Regional Water Board can ask for?

Yes. The information required must relate to an actual or suspected or proposed discharge of waste (including discharges of waste where the initial discharge occurred many years ago), and the burden of compliance must bear a reasonable relationship to the need for the report and the benefits obtained. The Regional Water Board is required to explain the reasons for its requirement.

What if I can provide the information, but not by the date specified?

A time extension may be given for good cause. Your request should be promptly submitted in writing, giving reasons.

Are there penalties if I don't comply?

Depending on the situation, the Regional Water Board can impose a fine of up to \$5,000 per day, and a court can impose fines of up to \$25,000 per day as well as criminal penalties. A person who submits false information or fails to comply with a requirement to submit a technical report may be found guilty of a misdemeanor. For some reports, submission of false information may be a felony.

Do I have to use a consultant or attorney to comply?

There is no legal requirement for this, but as a practical matter, in most cases the specialized nature of the information required makes use of a consultant and/or attorney advisable.

What if I disagree with the 13267 requirements and the Regional Water Board staff will not change the requirement and/or date to comply?

You may ask that the Regional Water Board reconsider the requirement, and/or submit a petition to the State Water Resources Control Board. See California Water Code sections 13320 and 13321 for details. A request for reconsideration to the Regional Water Board does not affect the 30-day deadline within which to file a petition to the State Water Resources Control Board.

If I have more questions, whom do I ask?

Requirements for technical reports include the name, telephone number, and email address of the Regional Water Board staff contact.

Revised March 2014

¹ All code sections referenced herein can be found by going to <http://leginfo.legislature.ca.gov/faces/codes.xhtml>.