ALAMEDA COUNTY HEALTH CARE SERVICES



DAVID J. KEARS, Agency Director



202735

December 24, 2001

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

Cynthia Adkisson Regulatory Compliance Specialist East Bay Municipal Utility District P. O. Box 24055, MS 704 Oakland, California 94623-1055

Re: Inspection of underground storage tanks, East Bay Municipal Utility District, South Area Service Center, 589 East Lewelling Boulevard, San Lorenzo CA 94580

Dear Ms. Adkisson:

A regulatory compliance inspection was performed at the subject facility on December 20, 2001. A technician from Gettler-Ryan Company facilitated the inspection. The purpose of the inspection was to determine compliance with conditions of the facility underground storage tank (UST) operating permit, as well as provisions of Title 23, California Code of Regulations (CCR) and California Health and Safety Code (HSC) Chapter 6.7.

The following is a summary of non-compliant and other conditions noted at the time of the inspection:

- The overfill alarm sensor for the used oil tank cannot be located to test or demonstrate the function. Make the sensor available for testing and demonstrate that the monitoring system is properly functioning as described in the monitoring plan.
- The monitoring panel, Gilbarco EMS, power-on lamp and warning lamp are burned out. All bulbs are required to function.
- The used oil fill is required to have a secure closure when not in use. There was no such closure available. Supply the correct size for the opening and use it to exclude any other wastes from the tank.
- The electronic monitoring system is supposed to be connected to an off-site call system through a modem. However, upon examination it was determined that the connector to the monitoring system was disconnected. Since the off-site notification is a back up for off-hours when the facility is unstaffed, someone is required to be responsible for recording the alarms and taking corrective actions. Provide documentation that the off-site notification is again functional.

East Bay Municipal Utility District South Area Service Center 589 East Lewelling Boulevard Page 2 of 2

At this time, you are required to correct the tank system operation and maintenance issues identified in this inspection report, namely:

• Correct the operation and maintenance problems identified during the December 20, 2001 inspection.

Pursuant to HSC Sec. 25288(d), you are required to submit a Plan of Correction within 60 days. This plan shall indicate the tasks to be completed, or those that have been completed already, and the schedule for doing so.

Your letter dated November 30, 2000 makes note of corrective actions planned to correct problems found during the September 18, 2000 inspection. However, this office has no record of that work ever being conducted. Please forward your responses and certification to the September 18, 2000 inspection prior to the deadline for the current noncompliance's. A copy of my letter detailing the deficiencies is enclosed.

You must <u>certify</u>, once all the necessary repairs and other tasks have been completed, that the tank system is in full compliance with HSC Chapter 6.7 and UST regulations. We recommend that you call for a follow-up inspection if necessary.

Please contact me at (510) 567-6781 should you have any questions about the content of this letter.

Sincerely,

Robert Weston

Sr. Hazardous Materials Specialist

c: Susan Hugo, ACDEH

ALAMEDA COUNTY HEALTH CARE SERVICES





DAVID J. KEARS, Agency Director

R02735

ENVIRONMENTAL HEALTH SERVICES

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

May 13, 1998

ATTN: Alex Coate

E B M U D 375 11th St Oakland CA 94607

RE: Project # 1065A - Type M

at 589 E Lewelling Blvd in San Lorenzo 94580

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$398.25, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested or any unused monies will be refunded to you or your designee.

The deposit refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$94 per hour.

Please be sure to write the following identifying information on your check: - project #

- type of project and

- site address

(see RE: line above).

If you have any questions, please contact Amir Gholami at (510) 567-6876.

Sincerely,

Tom Peacock, Manager

Environmental Protection

c: files



RAFAT A. SHAHID, Assistant Agency Director

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

November 13, 1992

Molly Ong EBMUD P.O. Box 24055 Oakland CA 94623-1055

RE: Tank Removal Case Closure - 589 E. Lewelling, San Lorenzo

Dear Ms. Ong:

I have spoken with Richard Hiett of the Regional Water Quality Control Board regarding case closure. He stated that in light of the Board's change in policy regarding formal concurrence with closure requests by local agencies, no closure letter is required by the RWQCB in the Lewelling Blvd. case. At the time I wrote the request for case closure, the Board was still formally reviewing closure requests for some sites where only soil contamination was known to exist. Mr. Hiett told me today that the Lewelling Av. facility is not now found on the RWQCB's list of contaminated sites. Therefore, this office is authorized to close this case. Based on information available to us at this time, this office requires no further investigative or remedial work to be carried out at your site in connection with the underground tank removal that occured 8/23/90.

You may contact me at (510)271-4320 with any questions.

Sincerely,

Pamela J. Evans

Senior Hazardous Materials Specialist

c: Leslie Peters, ACHCSA



RAFAT A. SHAHID, Assistant Agency Director

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

October 9, 1992

Molly Ong EBMUD P.O. Box 24055 Oakland CA 94623-1055

RE: Tank Removal Case Closure - 589 E. Lewelling, San Lorenzo

Dear Ms. Ong:

As we discussed, EBMUD's deposit to this office for oversight of tank removal, sampling and remediation activities has been expended. Please remit a check for \$250.00, payable to County of Alameda, for continued oversight of this project. Enclosed you will find a detailed accounting sheet for time spent so far on this case as well as an underground tank management plan for the new system.

Please contact me at 271-4320 with any questions.

Sincerely,

Pamela J. Evans

Senior Hazardous Materials Specialist

Enclosures

c: Leslie Peters, ACHCSA



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

June 5, 1991

Thomas C. Paulson EBMUD P.O. Box 24055 Oakland CA 94623

RE: Five Year Permits for Underground Storage Tanks Located at 589 E. Lewelling Blvd., San Lorenzo

Dear Mr. Paulson:

Before five year permits for operation of the three new tanks at the South Area Service Center can be issued, I will need to make a final inspection of the leak detection systems. Please notify me when these systems are operational so that I may schedule an inspection.

I am enclosing a Hazardous Materials Management Plan form. Because hazardous materials storage conditions have changed at your facility during the past year, your HMMP must be updated pursuant to Section 25505 (b) of the Health & Safety Code of California. Please complete and return the form to this office by July 10, 1991.

Sincerely,

Pamela J. Evans

Hazardous Materials Specialist

c: James Ferdinand, Eden Consolidated Fire Prevention District



May 6, 1991

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

Richard Hiett Regional Water Quality Control Board 2101 Webster St., 4th Floor Oakland CA 94612

RE: East Bay Municipal Utilities District Site 589 E. Lewelling Blvd.
San Lorenzo CA 94580
REQUEST FOR SITE CLOSURE

Dear Mr. Hiett:

I have reviewed the closure report and other information submitted by EBMUD representatives for the above referenced site. Copies of correspondence and reports pertaining to the operation and removal of two underground fuel tanks and the subsequent soil contamination investigation apparently have been supplied to your office.

Although some soil contamination was discovered at this site, I recommend that the Board consider this site for closure for the following reasons:

- 1. Sampling carried out at the site in both native and stockpiled soils has indicated that contamination levels were low and that contamination was confined to within a few feet of the former tanks.
- 2. The deepest known contamination was found at approximately 12-13' in the tank pits. Groundwater has been found to be at about 28' below the surface at this site. While the distance between these two points is only 15-16', three borings done at the site indicate that clay type soils predominate.
- 3. The lateral and vertical extent of contamination has been investigated and apparently remediated through overexcavation. Confirmatory sampling has shown nondetectable levels of gasoline and diesel constituents.
- I feel that clarification is needed regarding this last point: Field notes indicate that initial native soil samples were taken at 12'in the gas pit and at 13' in the diesel pit. Contamination was found in soil samples from both pits in the first sampling event. Field notes indicate that a second round of samples was later taken at 13' in

Richard Hiett RWQCB May 6, 1991 Page 2 of 2

both pits. In the case of the diesel pit, both the first and second sets of samples seemed to have been taken at the same depth. EBMUD's written reports of sampling and remediation activities do not specifically spell out how much soil was removed from the pits, so I questioned Thomas Paulson with EBMUD about specific remediation steps taken at the site. He stated to me that depth measurements for the diesel tank pit may have been inaccurate, however, a foot of native soil was overexcavated from each pit between the first and second sampling events.

Please contact me with any questions or concerns you may have about the site.

Sincerely,

Pamela J. Ewans

Hazardous Materials Specialist

amela J wans

c: Thomas Paulson, EBMUD

December 20, 1990

Walter J. Bishop EBMUD P.O. Box 24055 Oakland 94623 CA DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

RE: Site Closure Requirements for 589 E. Lewelling, San Lorenzo

Dear Mr. Bishop:

I have reviewed the information submitted by Thomas Paulson of your agency in his correspondence of December 12. He has adequately addressed my questions concerning sampling, laboratory certification, and disposal of stockpiled soil in connection with the tank removals at your San Lorenzo site. Although the methods and equipment used in resampling the overexcavated gas tank pit did not follow Regional Water Quality Control Board guidelines, the analysis results were consistent with what might be expected in this case; low levels of contamination found in the initial tank pit samples dropped to nondetectable in samples taken deeper into native soil.

Ultimately, this office reviews site history and characteristics, along with sampling and analysis data, and makes a recommendation to the RWQCB regarding case closure. In order to move toward closure of this case, some additional information is required. Attached is the RWQCB Closure Report format for your reference. Your office has already supplied a good portion of the listed data items as part of the closure plan, sampling reports, and addenda. Please use the enclosed format to provide the information specified on Table 3.

You may contact me with any questions regarding site closure at 271-4320.

Sincerely,

Pamela J. Evans

Hazardous Materials Specialist

Jamela J Evans

Enclosure

c: Richard Hiett, Regional Water Quality Control Board

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

November 20, 1990

Thomas C. Paulson EBMUD P.O. Box 24055 Oakland 94623 CA

RE: Soil Contamination Investigation at 589 E. Lewelling, San Lorenzo 94580

Dear Mr. Paulson:

Samples taken in conjunction with the August 23 removal of two tanks from the above property showed significant petroleum constituent contamination. EBMUD's Tank Closure Report of 9/21/90 included sampling results showing that toluene and xylene were present above Regional Water Quality Control Board action limits. I instructed in my letter of October 4 that EBMUD further investigate the extent of contamination and submit a sampling plan to this office prior to beginning work. No proposal was submitted prior to the second round of sampling carried out on October 12. As I was not notified prior to resampling of the tank pits, I was not present to oversee the work.

Thank you for the answers you have provided so far to my questions regarding EBMUD's investigation. As we discussed today, I have a few remaining concerns:

1. Resampling technique: Field notes submitted with the sampling report indicate that tank pit samples obtained on 10/12/90 were taken with a trowel and that analysis method 624 was to be used. A trowel is an unsuitable implement for procuring soil samples when volatile components are being sought. You must either provide assurance that EBMUD's method did not compromise the quality of the sample, or resample using acceptable sampling protocol. You stated today that the soil was, in fact, analyzed using method 8260 rather than method 624; please provide documentation from your laboratory.

Consult the following documents for sampling protocol quidelines:

Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites - 10 August 1990.

Leaking Underground Fuel Tank Field Manual - October, 1989.

These documents are available through the Regional Water Quality Control Board office.

Thomas C. Paulson EBMUD November 19, 1990 Page 2 of 2

- 2. State certification: It appears that EBMUD's inhouse laboratory was used to analyze the second set of samples. Provide assurance that EBMUD's laboratory is certified by the State Department of Health Services to perform the type of analysis required in this case.
- 3. Stockpile soils: EBMUD's letter of 10/25/90 states that excavated soils were hauled from the site. As some of these soils were contaminated, this office requires documentation that they were disposed of properly. Please provide a manifest or bill of lading showing the disposition of any contaminated soils.

Before resampling, you must submit a written work plan to this office describing the proposed number and location of samples as well as the method by which they will be taken. You are also required to submit the information requested in items 2 and 3. You may contact me with any questions at 271-4320.

Sincerely,

Pamela J. Evans Hazardous Materials Specialist

c: Richard Hiett, Regional Water Quality Control Board Walter Bishop, EBMUD

DAVID J. KEARS, Agency Director

R02735

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

October 4, 1990

Karen Folks EBMUD P.O. Box 24055 Oakland 94623 CA

RE: Soil Contamination at 589 E. Lewelling, San Lorenzo 94580

Dear Karen:

I have reviewed the sampling results and EBMUD's Final Tank Removal Report for the above site. In order to work toward closure of this tank removal case, EBMUD must:

- 1. Define the full lateral and vertical extent of fuel constituent contamination in and around the former tank pits.
- 2. Demonstrate that no detectable petroleum hydrocarbon residues exist in the soil at or below the seasonal high ground water level.
- 3. Describe the subsurface environment (soil types, hydrogeology, other subsurface features) at least to the seasonal high groundwater level in the vicinity of the former tank pits.

Before beginning the investigation, submit a work plan to this office describing the proposed number and location of samples to be taken as well as the manner in which the soil will be characterized. You may contact me with any questions at 271-4320.

Sincerely,

Pamela J. Evans

Hazardous Materials Specialist

c: Richard Hiett, Regional Water Quality Control Board



August 30, 1990

Karen Folks EBMUD P.O. Box 24055 Oakland 94623 CA DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

RE: Tank Installations at 589 E. Lewelling, San Lorenzo 94580

Dear Karen:

I have reviewed the installation plans for the three underground storage tanks at the Lewelling facility. Before the plans can be accepted, I need the following information:

- 1. Will shear valves be included within the two fuel pumps in order to prevent excessive product loss in the event of a rupture at ground level?
- 2. Where will the monitoring panel(s) be located?
- 3. The manufacturer's specifications for the overspill protector (EMW Wheaton A1003-001) list a capacity of 4.25 gallons. This office requires a minimum capacity of 5 gallons for overspill protectors. Please provide information regarding how you will meet this requirement.

In addition, your Hazardous Materials Management Plan for the site must be updated to reflect the changes in volume, type, and storage area of hazardous materials and wastes.

The required information may be supplied as an addendum to the original installation plan, if you wish. You may contact me with any questions at 271-4320.

Samela & Tuans

Pamela J. Evans

Hazardous Materials Specialist

c: James Ferdinand, Eden Fire Protection District