

FILE

2030 Addison Street, Suite 500 • Berkeley, California 94704 • 415 540-6954

November 5, 1990

Alameda County Health Agency Department of Environmental Health Hazardous Materials Division 80 Swan Way, Room 200 Oakland, CA 94621 87157.7 file: report

Attention: Mr. Lowell Miller

Subject:

Appeal to Discontinue Second Year of Groundwater Monitoring

Mill Springs Park Apartments (Formerly Livermore Superblock)

1809 Railroad Avenue, Livermore, California

Dear Mr. Miller:

As we discussed by telephone, Aqua Resources Inc. (ARI) understands that the Alameda County Health Agency will require a second year of groundwater monitoring at the subject site due to a change in Regional Water Quality Control Board guidance. This letter is an appeal of that determination. The basis of this appeal is as follows.

- The Closure Plan previously approved by the Alameda County Health Agency requires only one year of groundwater monitoring at the site. This monitoring program has been completed.
- The final report on the groundwater monitoring program concluded that no further groundwater monitoring is needed.
- Petroleum hydrocarbons, toluene, xylene, and ethyl benzene have not been detected in any of the five quarterly groundwater sampling events.
- Benzene was not detected above the method detection limit in the initial (May, 1989) nor in the final (May, 1990) groundwater sampling interval. In addition, the presence of benzene was not confirmed by subsequent resampling and analysis during the August 1989 groundwater sampling intervals.

Benzene was not detected in soil samples analyzed during remediation activities.

Background information on this site, and further information regarding soil and groundwater chemical analyses, is presented below.

Background

The site is located on Railroad Avenue, between South L and South P Streets, in Livermore, California. The site was known formerly as the Livermore Superblock, and is shown in relation to the City of Livermore on the Vicinity Map, Figure 1.

A groundwater monitoring program was conducted at the subject site from May 1989 to May 1990. Groundwater monitoring was performed on a quarterly basis during this one year period. This monitoring program was performed as part of the approved final closure plan for the subject site. Aqua Resources Inc. (ARI) provided environmental consultation and engineering services during the previous Phase I, Phase II, and Final Site Remediation and Closure for the Mill Springs Park Apartment Site.

The purpose of the monitoring program was to determine whether leakage of fuel oil from the previously removed concrete vault structure had migrated to groundwater underlying the site. Location of the monitoring well was determined based on the results of a March 14, 1989 Groundwater Study Report, and approved by the Alameda County Health Agency. The location of the monitoring well is shown in relation to the approved development plan on the Site Plan, Figure 2.

Copies of the monitoring well log and the Alameda County Flood Control and Water Conservation District Well Permit Form were presented in the Monitoring Well Installation report dated June 1, 1989. Chain of Custody Forms and the Certified Chemical Analysis reports for the year long monitoring program are presented as attachments to this report.

The groundwater elevations observed at the time of each sampling interval are shown in Figure 3. No relationship between groundwater elevation and the intermittent detection of benzene has been observed.

Summary of Chemical Analyses and Discussion of Results

Groundwater samples obtained at each quarterly sampling interval for chemical analysis were submitted to a State certified laboratory utilizing chain of custody protocols. Chemical analyses were performed by Curtis and Tompkins, Ltd., Analytical Laboratories in Berkeley. For quality assurance purposes, a split sample taken during the third sample interval was

also submitted to Brown & Caldwell in Emeryville, California. Travel blanks were also taken and analyzed where considered appropriate.

Chemical analyses included determination of Total Petroleum Hydrocarbons (TPH) by EPA Method 8015, and Benzene, Toluene, Xylene, Ethyl Benzene (BTXE) by EPA Method 8020. Results of the chemical analyses are presented on the attached certified laboratory reports. No analytes were detected above the method detection levels (1 part per million, 1 ppm) for the TPH analyses (EPA Method 8015). Benzene was the only EPA Method 8020 analyte detected above the method detection limit (.5 to 1.0 ppb); the other analytes (Toluene, Xylene and Ethyl Benzene) were not detected.

Benzene was not detected at every sample interval, and its detected concentration was determined to range from less than .5 ppb (method detection limit) to a measured maximum of 5 ppb. The Benzene concentration over time is shown in Figure 4. Benzene was not detected in the baseline sample interval nor in the fourth quarter sample interval. Although benzene was detected in the first sample interval, this result was not be confirmed during suggers roof for Carthersonoling Esce between subsequent resampling. Benzene was detected in the second and third quarter sample intervals at levels below the EPA MCL.

Conclusions and Recommendations

Based on the analyses of groundwater samples collected during the monitoring period from the monitoring well, no petroleum hydrocarbon contamination was detected in the groundwater samples that could be associated with the concrete vault structure that was removed. Review of the chemical test results indicates that all the TPH analytes were below the method detection limits. Benzene was detected above the method detection level (.5 ppb), but not on a consistent, repeatable basis. In addition, the measured Benzene concentration did not exceed the Maximum Contaminant Level (MCL) established by the EPA.

Based on the measured petroleum hydrocarbon concentrations and field observation that no free petroleum product was observed in the groundwater samples collected as part of the groundwater monitoring program, ARI concludes that continued monitoring is not beneficial. Therefore, ARI recommends that the monitoring well be abandoned and sealed in conformance with Alameda County Flood Control and Water Conservation District, Zone 7, requirements.

As discussed above, ARI sees no reason why continued groundwater monitoring would be beneficial at this site. If this appeal is denied, we request that the specific reasons for the denial be given in writing. We would be happy to meet with you to further discuss this request.

Limitations

Consistent with our discussions with the Client and the lead regulatory agency, namely the Alameda County Health Agency, our groundwater monitoring program included the installation and development of one groundwater monitoring well and quarterly groundwater sample collection. Chemical analyses were performed by others, not under ARI direct supervision. Test results are reported as received. Final determination of additional site remediation, if required, will be determined by the Alameda County Public Health Agency. We cannot guarantee or warrant that soil or groundwater at this site are not contaminated above allowable limits for a given contaminant. This report is limited in its scope to the analyses and review of samples obtained from the one monitoring well as required by the regulatory agency. All services were performed in substantial conformance with current standards of environmental engineering practice. No other warranty, express or implied, is made. 1. Variation occurred at least, 3 seniles - to should have at

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Very truly yours,

AOUA RESOURCES INC.

Mark Milani, P.E.

Project Manager

87157.7/disk 1/waiver.ltr

Attachments:

Certified Laboratory Reports

Chain of Custody Forms Figure 1 - Vicinity Map

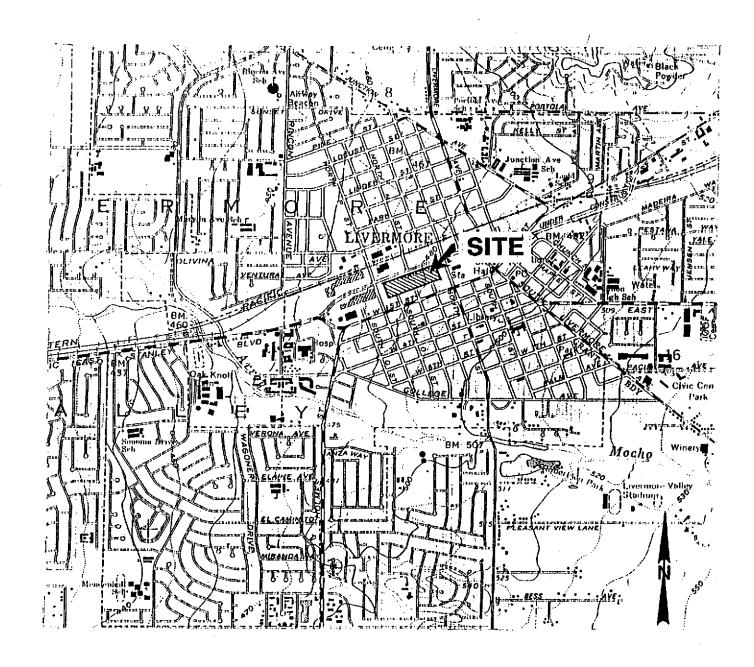
Figure 2 - Monitoring Well Location Plan

Figure 3 - Groundwater Elevation Over Time

Figure 4 - Benzene Concentration Over Time

cc: Addressee (2)

Mr. Ed Saub, Wingfield Companies



VICINITY MAP

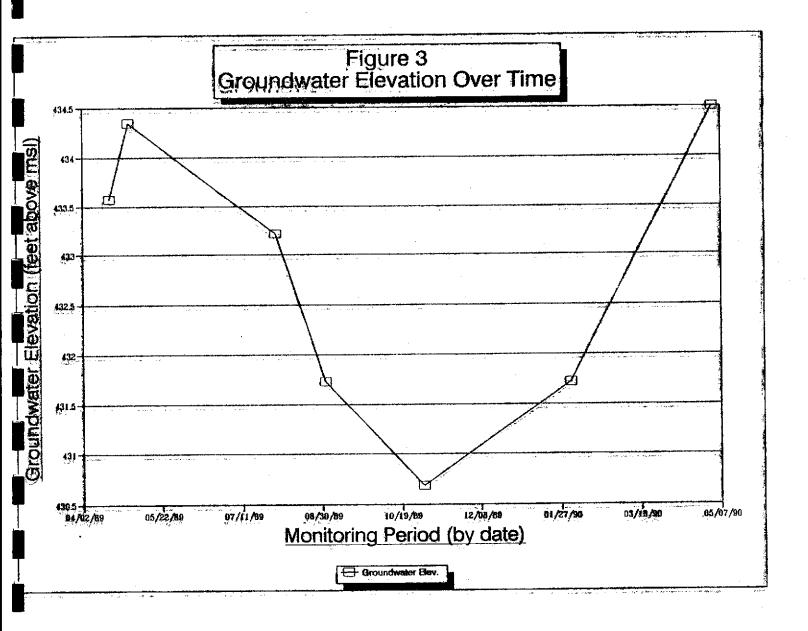
MILL SPRINGS PARK APARTMENTS

Railroad Avenue

Livermore, California

REFERENCE:

Portion of U.S.G.S. 7.5 Minute Topographic Quadrangle Map, Livermore, California, dated 1961, photorevised 1980, at a scale of 1:24,000.



Mill Springs Park Apartments 1809 Railroad Avenue Livermore, California ARI Job # 87157.7



2323 Flfth Street, Berkeley, CA 94710, Phone (415) 486-0900

TE RECEIVED: 05/02/89 TE REPORTED: 05/10/89 GE 1 OF 3

LAB NUMB

CLIENT: AQUA RESOURCES, INC.

REPORT ON: 1 WATER SAMPLE

JOB #: 87157.6 LOCATION: MILL SPRINGS PARK

•

RESULTS: SEE ATTACHED

Laboratory Director

Los Angeles



LABORATORY NUMBER: 17307 CLIENT: AQUA RESOURCES, INC.

PROJECT #: 87157.6

LOCATION: MILL SPRINGS PARK

DATE RECEIVED: 05/02/89 DATE ANALYZED: 05/08/89

DATE REPORTED: 05/10/89

PAGE 2 OF 3

Extractable Petroleum Hydrocarbons in Aqueous Solutions EPA 8015 (Modified) Extraction Method: EPA 3510

LAB ID	CLIENT ID	GASOLINE (mg/L)	KEROSINE (mg/L)	DIESEL (mg/L)	OTHER (mg/L)
17307-1A	MW-1	ND(0.50)	ND(0.50)	ND(0.50)	ND(0.50)

ND = Not Detected; Limit of detection in parentheses.

QA/QC SUMMARY RPD, % Spike: % Recovery 5 89



LABORATORY NUMBER: 17307 CLIENT: AQUA RESOURCES, INC. JOB NUMBER: 87157.6 JOB LOCATION: MILL SPRINGS PARK DATE RECEIVED: 05/02/89 DATE ANALYZED: 05/03/890 DATE REPORTED: 05/10/89

PAGE 3 OF 3

Benzene, Toluene, Ethyl Benzene, Xylenes by EPA 8020 Extraction by EPA 5030 Purge and Trap

LAB ID	CLIENT ID	BENZENE (ug/kg)	TOLUENE	TOTAL XYLENES (ug/kg)	ETHYL BENZENE (ug/kg)
17307-1B	MW-1	ND(1)	ND(1)	ND(1)	ND(1)

QA/QC SUMMARY

\$RPD 5 \$RECOVERY 96

AQUA RESOURCES, INC.

2030 ADDISON STREET, SUITE 500
Berkeley, CA. 94704
(415)540-6954

17307

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2323 Fifth Street, Berkeley, CA 9471O, Phone (415) 486-0900

DATE RECEIVED: 08/01/89 DATE REPORTED: 08/09/89

PAGE 1 OF 3

LAB NUMBER: 17928

CLIENT: AQUA RESOURCES

REPORT ON: 1 WATER SAMPLE

JOB #: 87157.6

PROJECT NAME: BARNETT RANGE

RESULTS: SEE ATTACHED

Laboratory/Director

Berkeley

Wilmington

Los Angeles



LABORATORY NUMBER: 17928
CLIENT: AQUA RESOURCES

PROJECT #: 87157.6

PROFECT NAME: BARNETT RANGE

DATE RECEIVED: 08/01/89 DATE ANALYZED: 08/03/89 DATE REPORTED: 08/09/89

PAGE 2 OF 3

Extractable Petroleum Hydrocarbons in Aqueous Solutions EPA 8015 (Modified) Extraction Method: EPA 3510

LAB ID	CLIENT ID	GASOLINE (mg/L)	KEROSINE (mg/L)	DIESEL (mg/L)	OTHER (mg/L)	
17928	MW-1	ND(0.5)	ND(0.5)	ND(0.5)	ND(0.5)	

ND = Not Detected; Limit of detection in parentheses.

	QA/QC SUMMARY	
RPD, %		7 95



LABORATORY NUMBER: 17928 CLIENT: AQUA RESOURCES

JOB NUMBER: 87157.6

PROJECT NAME: BARNETT RANGE

DATE RECEIVED: 08/01/89 DATE ANALYZED: 08/08/89

DATE REPORTED: 08/09/89

PAGE 3 OF 3

Benzene, Toluene, Ethyl Benzene, Xylenes by EPA 8020 Extraction by EPA 5030 Purge and Trap

LAB ID	CLIENT ID	BENZENE (ug/L)	TOLUENE	TOTAL XYLENES (ug/L)	ETHYL BENZENE (ug/L)	
17928	MW-1	5	ND(1)	ND(1)	ND(1)	

ND = Not Detected; Limit of detection in parentheses.

QA/QC SUMMARY

\$RPD 5 \$RECOVERY 95

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2323 Fifth Street, Berkeley, CA 9471O, Phone (415) 486-0900

DATE RECEIVED: 09/01/89 DATE REPORTED: 09/13/89

PAGE 1 OF 3

LAB NUMBER: 18172

CLIENT: AQUA RESOURCES, INC.

REPORT ON: 2 WATER SAMPLES

JOB #: 87157.6

LOCATION: LIVERMORE

RESULTS: SEE ATTACHED

OA/OC Officer

Laboratory Director



2323 Fifth Street, Berkeley, CA 9471O, Phone (415) 486-0900

DATE RECEIVED: 09/01/89 DATE REPORTED: 09/13/89

PAGE 1 OF 3

LAB NUMBER: 18172

CLIENT: AQUA RESOURCES, INC.

REPORT ON: 2 WATER SAMPLES

JOB #: 87157.6

LOCATION: LIVERMORE

RESULTS: SEE ATTACHED

QA/QC Officer

Laboratory Director



LABORATORY NUMBER: 18172 CLIENT: AQUA RESOURCES

PROJECT #: 87157.6 LOCATION: LIVERMORE DATE RECEIVED: 09/01/89 DATE ANALYZED: 09/07/89 DATE REPORTED: 09/13/89

PAGE 2 OF 3

Extractable Petroleum Hydrocarbons in Aqueous Solutions EPA 8015 (Modified) Extraction Method: EPA 3510

LAB ID	CLIENT ID	GASOLINE (mg/L)	KEROSENE (mg/L)	DIESEL (mg/L)	OTHER (mg/L)	
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18172-1 18172-2	1T 2T	, ,	, ,	ND(0.5)	,	·

ND = Not Detected; Limit of detection in parentheses.

QA/QC SUMMARY

RPD, %
Spike: % Recovery

LABORATORY NUMBER: 18172 CLIENT: AQUA RESOURCES JOB NUMBER: 87157.6 JOB LOCATION: LIVERMORE DATE RECEIVED: 09/01/89 DATE ANALYZED: 09/13/89 DATE REPORTED: 09/13/89

PAGE 3 OF 3

Benzene, Toluene, Ethyl Benzene, Xylenes by EPA 8020 Extraction by EPA 5030 Purge and Trap

LAB ID	CLIENT ID	BENZENE	BENZENE TOLUENE		ETHYL BENZENE
		(ug/L)	(ug/L)	(ug/L)	(ug/L)
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18172-1	117	ND(1)	ND(1)	ND(1)	ND(1)
18172-2	2Т	ND(1)	ND(1)	ND(1)	ND(1)

QA/QC SUMMARY

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2323 Fifth Street, Berkeley, CA 9471O, Phone (415) 486-0900

DATE RECEIVED: 11/03/89 DATE REPORTED: 11/13/89

PAGE 1 OF 3

LAB NUMBER: 18621

CLIENT: AQUA RESOURCES

REPORT ON: 1 WATER SAMPLE

JOB #: 87157.6

RESULTS: SEE ATTACHED



LABORATORY NUMBER: 18621-1 CLIENT: AQUA RESOURCES

JOB #: 87157.6 SAMPLE ID: W - 1 DATE RECEIVED: 11/03/89 DATE ANALYZED: 11/03/89 DATE REPORTED: 11/13/89

PAGE 2 OF 3

EPA 602: Volatile Aromatic Hydrocarbons in Water

COMPOUND	RESULT ug/L	DETECTION LIMIT ug/L
Benzene	3.0	1
Toluene	ND	1
Ethyl Benzene	ND	1
Total Xylenes	ND	1
Chlorobenzene	ND	1
1,4-Dichlorobenzene	ND	1
1,3-Dichlorobenzene	ND	. 1
1,2-Dichlorobenzene	ND	1.
ND = None Detected		•
QA/QC SUMMARY		
RPD % SPIKE RECOVERY %		7



LABORATORY NUMBER: 18621 CLIENT: AQUA RESOURCES PROJECT #: 87157.6 DATE RECEIVED: 11/03/89 DATE ANALYZED: 11/08/89 DATE REPORTED: 11/13/89

PAGE 3 OF 3

Extractable Petroleum Hydrocarbons in Aqueous Solutions EPA 8015 (Modified) Extraction Method: EPA 3510

LAB ID	CLIENT ID	GASOLINE (mg/L)	KEROSENE (mg/L)	DIESEL (mg/L)	OTHER (mg/L)	
18621-1	W - 1	ND(0.5)	ND(0.5)	ND(0.5)	ND(0.5)	•

ND = Not Detected; Limit of detection in parentheses.

QA/QC SUMMARY

RPD, %
Spike: % Recovery

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2323 Fifth Street, Berkeley, CA 9471O, Phone (415) 486-O9OO

DATE RECEIVED: 02/05/90 DATE REPORTED: 02/12/90

PAGE 1 OF 3

LAB NUMBER: 19482

CLIENT: AQUA RESOURCES

REPORT ON: 1 WATER SAMPLE

PROJECT #: 87157.6

RESULTS: SEE ATTACHED

0A/0C Officer

1 an la

aborator Director

Los Angeles



1:

LABORATORY NUMBER: 19482 CLIENT: AQUA RESOURCES PROJECT #: 87157.6

DATE RECEIVED: 02/05/90 DATE ANALYZED: 02/10/90 DATE REPORTED: 02/12/90

PAGE 2 OF 3

Extractable Petroleum Hydrocarbons in Aqueous Solutions California DOHS Method LUFT Manual October 1989

LAB ID	CLIENT ID	KEROSENE (mg/L)	DIESEL (mg/L)	OTHER (mg/L)	
19482-1	W - 1	ND(0.5)	ND(0.5)	ND(0.5)	•

ND = NOT DETECTED; LIMIT OF DETECTION IN PARENTHESES

QA/QC SUMMARY

RPD, % Spike: % Recovery

4 96

AQUA PERMITENDA, MOL



FEE 2 0 1990

LABORATORY NUMBER: 19482-1 CLIENT: AQUA RESOURCES

JOB #: 87157.6 SAMPLE 1D: W - 1 DATE REPORTED: 02/16/90

DATE RECEIVED: 02/05/90 JOHNS DATE ANALYZED: 02/15/90

PAGE 3 OF 3

EPA 602: Volatile Aromatic Hydrocarbons in Water

COMPOUND	RESULT ug/L	DETECTION LIMIT ug/L
Benzene	4.5	0.5
Toluene	ND	0.5
Ethyl Benzene	ND	0.5
Total Xylenes	ND	0.5
Chlorobenzene	ND	0.5
1,4-Dichlorobenzene	ND	0.5
1,3-Dichlorobenzene	ND	0.5
1,2-Dichlorobenzene	ND	0.5

ND = None Detected

QA/QC SUMMARY

<1 RPD % 93 SPIKE RECOVERY %

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Analytical Report

LOG NO: E90-02-104

Received: 02 FEB 90 Reported: 14 FEB 90

Mr. Mark Milani Aqua Resources Inc. 2030 Addison Street, Suite 500 Berkeley, California 94704 Purchase Order: 87157.6

REPORT OF ANALYTICAL RESULTS

Fage 1

LOG NO	SAMPLE DESCRIPTION, AQUEOUS SAMPLES		DATE SAMPLED
02-104-1			02 FEB 90
PARAMETER		02-104-1	
1,3-Dichlo 1,4-Dichlo Benzene, to Chlorobenze Ethylbenze Toluene, to	acted probenzene, ug/L	02.12.90 <0.5 <0.5 <0.5 3.2 <0.5 <0.5 <0.5 <0.5 <0.5	

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Analytical Report

LOG NO: E90-02-104

Received: 02 FEB 90 Reported: 14 FEB 90

Mr. Mark Milani Aqua Resources Inc. 2030 Addison Street, Suite 500 Berkeley, California 94704

Purchase Order: 87157.6

REPORT	OF.	ANALYTICAL	RESULTS
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Page 2

LOG NO	SAMPLE DESCRIPTION, BLANK WA	ATER SAMPLES	DATE SAMPLED
02-104-2	Trip Blank		
PARAMETER		02-104-2	
1,3-Dichlo 1,4-Dichlo Benzene, u Chlorobenz Ethylbenze Toluene, u	cted crobenzene, ug/L crobenzene, ug/L crobenzene, ug/L crobenzene, ug/L cene, ug/L cene, ug/L	02.09.90 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.5 <0.	

Sim D. Lessley, Ph.D., Laboratory Director



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2323 Fifth Street, Berkeley, CA 94710, Phone (415) 486-0900

DATE RECEIVED: 05/02/90 DATE REPORTED: 05/07/90

PAGE 1 OF 3

LAB NUMBER: 100358

CLIENT: AQUA RESOURCES

REPORT ON: 1 WATER SAMPLES

PROJECT #: 87157.6

RESULTS: SEE ATTACHED

QA/QC Approval

Final Appro



LABORATORY NUMBER: 100358 CLIENT: AQUA RESOURCES

JOB #: 87157.6

DATE RECEIVED: 05/02/90 DATE EXTRACTED: 05/03/90 DATE ANALYZED: 05/04/90 DATE REPORTED: 05/07/90

PAGE 2 OF 3

Extractable Petroleum Hydrocarbons in Aqueous Solutions
California DOHS Method
LUFT Manual October 1989

LAB ID	CLIENT ID	KEROSENE RANGE (mg/L)	DIESEL RANGE (mg/L)	REPORTING LIMIT (mg/L)
100358-1	W-1	ND	ND	0.50

ND = Not detected at or above reporting limit.

QA/QC SUMMARY

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RPD, %
RECOVERY, %
96



LABORATORY NUMBER: 100358-1

CLIENT: AQUA RESOURCES

JOB #: 87157.6 SAMPLE ID: W-1 DATE RECEIVED: 05/02/90
DATE ANALYZED: 05/03/90
DATE REPORTED: 05/07/90

PAGE 3 OF 3

EPA 8020: Volatile Aromatic Hydrocarbons in Water

COMPOUND	RESULT ug/L	REPORTING LIMIT ug/L
Benzene	ND	0.50
Toluene	ND	0.50
Ethyl Benzene	ND	0.50
Total Xylenes	ND	0.50
Chlorobenzene	ND	0.50
1,4-Dichlorobenzene	ND	0.50
1,3-Dichlorobenzene	ND	0.50
1,2-Dichlorobenzene	ND	0.50

ND = Not detected at or above reporting limit.

QA/QC SUMMARY	
RPD, %	2
RECOVERY, %	90

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