## ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY DAVID J. KEARS, Agency Director

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 7, 1992

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

RE: Pacific Trust
21450 Mission Blvd.
Hayward CA 94541
REQUEST FOR SITE CLOSURE

Dear Mr. Hiett:

I have reviewed the closure request and other information submitted by Pacific Trust for the above referenced site. Copies of correspondence and reports pertaining to the operation and removal of underground fuel tanks and the subsequent soil contamination investigation that apparently have not been supplied to your office are enclosed.

Although sampling done in 1990 showed that some soil contamination occured at this site, I recommend that the Board consider this site for closure. In December, 1991, a supplemental investigation was carried out that indicates that the contamination found at the site is unlikely to present a threat to groundwater. Below is a summary of the findings in this case:

- 1. 1990 soil sampling done in the immediate area of the former kerosene tank indicates that diesel range petroleum hydrocarbons exist at levels between 0 170 ppm. Some overexcavation of contaminated soil was done, but confirmatory sampling indicated that detectable levels remained. Follow-up sampling was done via a boring to 27' in the former tank pit area, but these samples indicated that TPH levels were not dropping significantly with depth.
- 2. In December, 1991, eight soil samples were retrieved from a boring beneath the former kerosene tank pit. These samples were taken at 5' intervals from 30' to 65'. No detectable levels of petroleum hydrocarbons were found. Also, 1991 boring log data supports the case that groundwater at the site is below 60'. Furthermore, December 1991 data shows that at least 7' of clay soil was found immediately above the groundwater level.

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> A similar clay layer was reported in another nearby deep boring done in 1990. Data from these two borings indicate that a 30' separation and an aquitard thicker than 5' exist between the last known contamination and groundwater.

3. While some contaminated soil was left in place in the area of the former kerosene tank, petroleum levels were low (less than 200 ppm in all cases). As well, this tank was quite small, approximately 80 gallons.

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

Sincerely,

Pamela J. Evans

Senior Hazardous Materials Specialist

c: Leonard R. Overholser, Pacific Trust
Valentin Constantinescu, Environmental Geosciences
Engineering



Telephone Number: (415)

October 8, 1991

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

RE: Pacific Trust Site, 21450 Mission Blvd., Hayward CA 94541

Dear Mr. Feldman:

I have reviewed the Request for Case Closure submitted to the Board by Environmental Geosciences Engineering, Inc. Below I have outlined my reservations regarding site closure:

Last spring I informed the responsible party that further investigation of the depth of soil contamination beneath the former kerosene tanks was needed before the case could be referred to the RWQCB for closure. I specified that soil sampling results showing a drop of contaminants to nondetectable levels within a few feet of the base of the former tank pit could present a convincing argument for case closure. Subsequently, soil sampling was carried out beneath the former tank via a 30 foot soil boring. Chemical analyses of soil from depths of 6, 12, 16, 21, and 27 feet showed that petroleum hydrocarbon contamination was present in all samples, with concentrations ranging from 40 to 170 ppm Total Extractable Petroleum Hydrocarbons. These results do not indicate that contaminant levels drop significantly with depth beneath the former tank. fact, a non-detect level was never reached in the boring.

After reviewing the investigation report, I discussed site conditions with Richard Hiett of your Board. He concurred with me that boring log data from the site does not document the presence of a five foot thick aquitard between soil contamination and groundwater, whether it occurs at 30 or 60 feet. In fact, log data indicates that soils at the site are permeable. Also, assuming that the zone of near-saturation found to occur at about 30 feet at the site is not actually a perched aquifer, and that the groundwater level at the site is, in fact, at about 60 feet, it has not been demonstrated that a 20 foot separation exists between last known contamination (currently 73 ppm at 27') and groundwater. Contamination may exist deeper in the boring than 27 feet, where the last sample was taken.

Lester Feldman Regional Water Quality Control Board October 8, 1991 Page 2 of 2

Under these circumstances, I feel it is not possible for me to recommend closure of this site to your Board. You may contact me with any questions at (415)271-4320.

Sincerely,

Pamela J. Evans

Hazardous Materials Specialist

c: Eddy So, RWQCB Leonard Overholser, Pacific Trust Chris French, Environmental Geosciences Engineering, Inc.



August 14, 1991

Leonard Overholser Pacific Trust Company 1245 South Winchester Blvd. San Jose CA 95128

RE: 21450 Mission Blvd., Hayward CA 94541

Dear Mr. Overholser:

I have reviewed the Supplemental Investigation report prepared June 14, 1991 by Eirra Consultants. The reports presents the results of chemical analysis and boring log data from investigation work carried out on May 10, 1991 at the above referenced site.

I stated in my correspondence to you dated March 14, 1991, that further investigation of the depth of soil contamination beneath the former kerosene tanks was needed before the case could be referred to the RWQCB for closure. I specified that soil sampling results showing a drop of contaminants to nondetectable levels within a few feet of the base of the former tank pit could present a convincing argument for case closure. Subsequently, Eirra Consultants submitted a workplan acceptable to this office and then sampled soil beneath the former tank via a 30 foot soil boring. Chemical analyses were done of soil taken from depths of 6, 12, 16, 21, and 27 feet. Petroleum hydrocarbon contamination was present in all of these samples, with concentrations ranging from 40 to 170 ppm Total Extractable Petroleum Hydrocarbons. These results do not indicate that contaminant levels drop significantly with depth beneath the former tank.

After reviewing the Supplemental Investigation report, I discussed site conditions with Richard Hiett of the RWQCB. Generally speaking, the San Francisco Bay Regional Board may allow closure in cases such as yours without installation and monitoring of wells when either or both conditions listed below exist:

- 1. A continuous aquitard (soil layer impermeable to groundwater) of at least five foot thickness has been shown through boring log data to exist between the deepest known soil contamination and first groundwater.
- 2. Deepest known soil contamination and first groundwater are separated by a distance 20 feet.

DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415) Leonard Overholser Pacific Trust August 14, 1991 Page 2 of 2

Boring log data from your site does not document the presence of a five foot thick aquitard between soil contamination and groundwater, whether it occurs at 30 or 60 feet. In fact, log data indicates that soils on your site are permeable. Also, assuming that the zone of near-saturation found to occur at about 30 feet at your site is not, even in non-drought conditions, actually a perched aquifer, and that the groundwater level at the site is, in fact, at about 60 feet, it has not been demonstrated that a 20 foot separation exists between last known contamination (currently 73 ppm at 27') and groundwater.

Under these circumstances, it is not possible for me to recommend closure of this site to the Regional Board. You may contact me with any questions at (415)271-4320.

Sincerely,

Pamela J. Evans

Hazardous Materials Specialist

c: Richard Hiett, RWQCB Chris French, Eirra Consultants



November 14, 1990

Leonard Overholser Pacific Trust Company 1245 South Winchester Blvd San Jose CA 95128 DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Oakland, CA 94621 (415)

RE: Underground Tank Storage Removal and Site Remediation 21450 Mission Blvd, Hayward 94541

## Dear Mr. Overholser:

I have reviewed the Underground Storage Tank Closure Report for the above property prepared by Christopher M. French and dated October 2, 1990. The following items need to be addressed before I can recommend closure to the San Francisco Regional Water Quality Control Board (RWQCB):

- 1. In the first round of tank pit sampling that occured in conjunction with the June 28 tank removal, significant levels of contamination were found in soil beneath the 80 gallon kerosene tank. Soil was "overexcavated" from the pit, and the walls and base were retested. The second round of sample results has not shown a significant drop in concentration of fuel constituents in the pit. At this point, you are required to either further investigate the depth and lateral spread of the contamination in the pit, or proceed directly to groundwater monitoring to ensure that no impact has occured.
- 2. You must submit copies of the hazardous waste manifests for the tanks and tank liquids signed by a representative of the treatment or disposal facility that received the waste.
- 3. A contamination report is required for the site. I discussed this issue with Chris French, who agreed to complete this form and forward it to my office.
- 4. One of the stockpile soil (excavated soil from the tank pit) samples showed xylene levels of .036 parts per million (ppm). This soil should have been remediated and retested prior to being replaced in the pit. You must either provide assurance that this contaminated soil will not impact groundwater or implement a groundwater monitoring program.

Leonard Overholser Pacific Trust November 14, 1990 Page 2 of 2

The deposit submitted to this office for oversight of the tank removal and subsequent remediation has been exhausted. You must submit an additional deposit of \$300.00 in order to cover past and future costs for your project to this department. You may contact me with any questions at (415)271-4320.

Sincerely,

Pamela J. Evans

Hazardous Materials Specialist

Vamela 9 Evans

c: Richard Hiett, Regional Water Quality Control Board Howard Hatayama, Department of Health Services Christopher M. French, R.G.