

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02847

22 September 1989

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

Ignacio Dayrit
Emeryville Redevelopment Agency
City of Emeryville
2200 Powell Street
12th Floor
Emeryville, CA 94608

Subject: Closure Procedure for the Underground Storage Tank
located at the former Transo facility, 1600 64th Street,
Emeryville.

Dear Mr. Dayrit:

Following the meeting between yourself and Dennis Byrne of our staff, this letter has been prepared to inform you of the underground tank closure procedure utilized within Alameda County. I will attempt to provide a brief description of the various steps of the process and identify those areas in which problems are often encountered.

Our records indicate that a 300 gallon underground storage tank was installed beneath the building listed above. There is no indication as to what material was stored in this tank, but Bruce Dipple, of Transo Envelope Company, can probably provide this information to you. This operation is currently located at 240 Littlefield Avenue, South San Francisco 94080, (415) 244-6250.

Prior to the review of a submitted closure plan the applicant is required to submit a deposit. This deposit is authorized by Section 3-141.6 of the Ordinance Code of the County of Alameda, and is used to cover the expenses incurred by County personnel in the follow-up activities associated with the project. Upon completion of the project the balance of the deposit is refunded to the applicant. For the removal of a single tank, a deposit of \$333.00 is required.

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We at the Hazardous Materials Division issue a standard closure plan document which we request applicants to complete and submit to us, in triplicate, for review. When highlighted with the red "Accepted" stamp, this form constitutes a legal permit authorizing the removal project to take place. A blank copy of this plan is included with this letter. In addition to the closure plan we require a plot plan of the facility, a copy of the contractor's workman's compensation insurance certificate and a site safety plan also be submitted for review.

Common omissions on closure plans include; the EPA Identification Number of the facility, no listing of the historic contents of the tanks, suggesting improper soil analysis tests for the reported tank contents, not listing a registered hazardous waste hauler to remove the tank(s) from the job site following excavation and not signing the closure plan. Minimum requirements for a site safety plan include a statement that an explosimeter will be present to gauge tank atmospheric conditions prior to removal, identify a person with overall responsibility for site safety and specifying a minimum of two fire extinguishers and level C protective clothing to be available to workers on the job site. Inspectors are granted a considerable amount of discretion in regards to the specific details which they require to be stated on a site safety plan for approval.

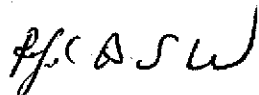
Upon approval of the submitted closure plan we request that you notify us a minimum of forty-eight hours in advance of the scheduled removal date. This is to allow our inspectors to organize their weekly schedules accordingly and facilitate having a representative from our office on-hand to observe the removal. It is not essential that an inspector be present during the tank removal per se, but many of our inspectors like to have an opportunity to examine the tanks and excavated soil for evidence of leakage, and to observe the collection of soil samples. The decision to be on-hand during the tank removal is left to the discretion of the individual inspector.

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Following the tank removal all analytical data, Chain of Custody Forms and manifests documenting the disposal of the tank and any contents must be submitted to our office for review. If all is in order and no site remediation is required, a sign-off letter is issued and the County Billing Department is notified to refund any balance of the deposit to the applicant. Though we are the lead agency in regards to administering Title 23 of the California Code of Regulations within Alameda County, it is the responsibility of the San Francisco Bay Regional Water Quality Control Board to issue the final approval of any underground tank project within it's jurisdiction.

If you have any questions or require further clarification regarding the underground storage tank closure process utilized within Alameda County, please contact, Dennis Byrne, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,



Rafat A. Shahid, Chief,
Hazardous Materials Division

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enclosure