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

RO#2849

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

January 5, 1999

Mr. David Kuhre
Oliver Rubber Company
1200 65th Street
Emeryville, California 94608

Subject: **Oliver Rubber Company (SLIC# 1330)**
1200 65th Street, Emeryville, CA 94608

Dear Mr. Kuhre:

This agency and the Cal-EPA / San Francisco Bay Regional Water Quality Control Board (RWQCB) have reviewed the following reports submitted for the subject site:

- Human Health Risk Assessment for Oliver Rubber Company Plant 1 (December 4, 1998), prepared and submitted by McLaren Hart
- Risk Assessment Work Plan for Oliver Rubber Company Plant 1 (November 18, 1998), prepared and submitted by McLaren Hart
- Report Regarding the Presence and Source of Chlorinated Solvents in Groundwater Beneath the Oliver Rubber Company Property (November 30, 1998), prepared and submitted by Aqua Science Engineers
- Additional Soil and Groundwater Assessment Report (September 25, 1998), prepared and submitted by Aqua Science Engineers

The referenced reports documented the recent work conducted to address the source of chlorinated solvents found in the groundwater and the potential human health risks associated with volatile organic compounds (VOCs) in the groundwater. This agency and the RWQCB have evaluated the data collected for the site. Based on our review of the data submitted to date for the subject site and with the provision that all information provided to the agencies are accurate and representative of site conditions, we conclude that the source of chlorinated solvents found in the groundwater is likely the result of migration from an upgradient site. Oliver Rubber Company does not appear to be the source of the chlorinated solvent found in the groundwater beneath the facility and no further action related to the chlorinated solvent in groundwater is required.

In addition, the result of the human health risk assessment conducted for the subject site showed that the VOCs in groundwater do not appear to pose an adverse health effect to potential on-site residential receptors.

On August 12, 1998, the County issued a letter regarding the Raffex (a heavy petroleum hydrocarbon similar to liquid tar at elevated temperatures) found in soil and groundwater at the site. No further action related to the Raffex tank vault release is required provided the following conditions are met:

1) Preventive measures should be in place to protect the disturbance of the closed tank vault. Your proposal to place a use restriction at the site is acceptable to both agencies.
2) The closed tank vault should be identified on the parcel map for the site.
3) Use restriction (#1) and parcel map (#2) should be recorded and a copy of the recorded deed should be submitted to both agencies and the City of Emeryville Building and Planning Department.

4) If the closed tank vault is proposed to be disturbed, a risk management plan (RMP) should be submitted and approved by this office. The RMP should include at a minimum the following items: an acceptable health and safety plan to be followed during activities involving exposure to soil and groundwater contamination, soil and groundwater management plan, site mitigating measures to prevent any potential vertical conduits between shallow and deeper aquifers, etc.

It is our understanding that there is an on-going property transfer and the potential buyer intends to develop the property for work/live residential usage. This office and the RWQCB have no objection to develop the subject site for its proposed use provided all the above conditions and applicable requirements from other regulatory agencies are met.

If you have any questions regarding this letter or the subject site, please contact me at (510) 567-6780 or Ravi Arulanantham at (510) 622-2308.

Sincerely,

Susan L. Hugo
Hazardous Materials Specialist

Ravi Arulanantham, Ph.D.
Staff Toxicologist, Cal-EPA/S.F. Bay RWQCB

Concur:

Stephen Morse, P.E., Chief
Toxics Cleanup Division, Cal-EPA/S.F. Bay RWQCB

c: Mee Ling Tung, Director, Environmental Health
Dick Pantages, Chief, Hazardous Materials Programs
Tom Peacock, Manager, Hazardous Materials Programs
Barry Cromartie, Emeryville Building and Planning Dept.,2200 Powell St., 12th Floor, Emeryville, CA 94608
Ignacio Dayrit, Emeryville Redevelopment, Agency, 2200 Powell St., 12th Floor, Emeryville, CA 94608
David Allen, Aqua Science Engineers, Inc. 208 West El Pintado Road, Danville, CA 94525
Todd Bernhardt, McLarenHart, 1320 Harbor Bay Parkway, Suite 100, Alameda, CA 94502
SH /RA/ files

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

RO#2849

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

August 12, 1998

Mr. David Kuhre
Oliver Rubber Company
1200 65th Street
Emeryville, California 94608

Subject: Oliver Rubber Company – 1200 65th Street, Emeryville, CA 94608 (SLIC# 1330)

Dear Mr. Kuhre:

This agency has reviewed the case file concerning the petroleum hydrocarbon contamination associated with Raffex (a heavy petroleum hydrocarbon similar to liquid tar at elevated temperatures) found in soil and groundwater at the above referenced site. We are in receipt of the following reports submitted by Aqua Science Engineers for the subject site:

- Additional Soil and Groundwater Assessment Report, July 20, 1998
- Workplan for Soil and Groundwater Assessment, June 25, 1998
- Soil and Groundwater Assessment Report, April 30, 1998
- Workplan for Soil and Groundwater Assessment, March 20, 1998
- Soil and Groundwater Assessment Report, February 19, 1998

The site is located in an industrial /commercial area of Emeryville, surrounded by present and former industrial facilities and railroad tracks immediately to the west of the site boundary. The property was used primarily as a rubber manufacturing plant from 1950's through 1997. The facility is currently vacant.

Raffex 120 was used during the production of rubber for tire treads and stored in three 5,000 - gallon tanks inside a subgrade concrete vault outside the plant. The tanks have been removed and disposed off site. In February 1998, soil and groundwater samples were collected in the area of the vault and found up to 380 ppm Raffex in soil beneath the vault. Grab water sample collected from the bottom of the vault found up to 28 ppm Raffex. On April 8, 1998, twelve borings (BH-1 to BH-12) were drilled between 2 to 6 feet below ground surface (bgs) at the site. Soil samples collected from two borings (BH-11 and BH-12) downgradient of the vault at 6 feet bgs detected up to 74 ppm Raffex. Nine soil borings (BH-1 to BH-9) were drilled inside the building to depths ranging from 2.5 feet to 6 feet below ground surface (bgs) and detected up to 40 ppm Raffex, 260 ppm oil & grease and 18 ppm zinc. Volatile organic compounds (VOCs) were not detected in the soil.

On July 1, 1998, five soil borings (BH-13 to BH-17) were drilled further downgradient of the vault and near the railroad spur to define the extent of the TPH Raffex found in soil and groundwater at the site. Analytical results showed up to 56 ppm TPH Raffex and 7.6 ppb 1,1-dichloroethene detected in soil. Groundwater samples showed up to 270 ppb TPH Raffex, 11 ppb phenol, 0.56 ppb benzene, 1.3 ppb toluene, 0.63 ppb 1,1 DCA, 3.2 ppb 1,1-DCE, and 0.90 ppb 1,1,1-TCA. Semi volatile organic compounds were not detected in both soil and groundwater samples.

Based upon the available information and with the provision that the information provided to this agency was accurate and representative of site conditions, the subject site can be closed as a low risk soil and groundwater case provided a long term risk management plan is submitted and approved by this office. The long term risk management plan must include at a minimum the following items:

- An acceptable health and safety plan to be followed during activities involving exposure to soil and groundwater contamination
- Soil and groundwater management plan prior to any construction activities at the site
- Site mitigating measures to prevent any potential vertical conduits between shallow and deeper aquifers
- Environmental risk assessment will be required if a change in land use, structural configuration or site activities are proposed such that a more conservative scenario needs to be evaluated
- A deed notice is required and a copy of the recorded deed should be submitted to this agency and the City of Emeryville Building and Planning Department

If you have any questions regarding this letter or the subject site, please contact me at (510) 567-6780.

Sincerely,

Susan L. Hugo
Hazardous Materials Specialist

c: Derek Lee, San Francisco Bay RWQCB
Claudia Cappio, Emeryville Building and Planning Dept.,2200 Powell St., 12th Floor, Emeryville, CA 94608
Ignacio Dayrit, Emeryville Redevelopment, Agency, 2200 Powell St., 12th Floor, Emeryville, CA 94608
David Allen, Aqua Science Engineers, Inc. 2411 Old Crow Canyon Road, Suite # 4, San Ramon, CA 94583
SH / files

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

R0608

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

May 12, 1998

ATTN: Sir Or Madam

Aqua Science Engineers
2411 Old Crow Canyon Rd. #4
San Ramon CA 94583

RE: Project # 1713B - Type R
at 1200 65th St in Emeryville 94608

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 $634.50, 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

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

(RWQCB)
RO # 2789

October 30, 1997

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

Ms. Diane Heinze
Port of Oakland
530 Water Street
Oakland, CA - 94604

Ref: Former Cryer Boat Yard-Port of Oakland, 1899 Dennison Street, Oakland, CA

Dear Ms. Heinze:

I am in receipt of the Phase II site investigation report, dated August 4, 1997, prepared by Shawnee Company, Inc. for the above referenced site.

In 1995, Clayton Environmental Consultants conducted a Phase I Environmental Site Assessment of the above referenced site. Soil samples collected from eight soil borings indicated that elevated levels of diesel and metals were present on site. In some of the soil samples, metal concentrations exceeded the Title 22 hazardous waste levels.

In May 1997, to define the extent of contamination near areas Sb-3 and Sb-2, two additional samples (Sb-9 and Sb-10) were collected and analyzed for metals and diesel. Lead was found in concentrations higher than the hazardous waste levels (1000 ppm) and the Region 9 Preliminary Remediation Goals (PRG's) in one of the soil samples collected from a deeper depth (3 feet). Also, additional soil samples were collected along the dry dock rail and near the above ground storage tank area. Copper was found in concentrations above the hazardous waste levels in one of the soil borings near the dry dock rail area. Diesel was found in concentrations up to 8300 ppm. Laboratory analysis of filtered groundwater samples did not identify the presence of metals above detection limits or diesel in significant concentrations.

Since ground water samples collected from the Former Cryer Boatyard Facility, detected 55 ppb of benzene from a location near the above ground tank area, this Department requires that additional soil and groundwater samples be collected from this area (in Port of Oaklands portion of the property) and analyzed for benzene and gasoline. Subsequent to the completion of this investigation, please use all the pertinent data available on site to conduct a site specific risk assessment to evaluate the potential risk to human health and the ecosystem due to the residual contaminants present on site. The risk assessment should be based on the current or/and future-use scenario for the site. Please note that since the site is located near the bay, both threat to human health and the eco-system will be considered in the final evaluation.

Please submit a workplan for the additional investigation within 30 days from the date of this letter. If you have any questions, you may reach me at (510) 567-6764.

Sincerely,

Madhulla Logan

Madhulla Logan
Hazardous Material Specialist

C: **Leroy Griffin**, City of Oakland Fire Department, Oakland, CA
Steve Cowley, Steam Valve and Machine Co, Inc, 98 Hegenberger Loop, Oakland, CA - 94621
Steven Hill, Regional Water Quality Control Board, Oakland, CA

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

RO#2789

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

October 29, 1997

Stephen Cowley
Steam Valve and Machine Co, Inc
98 Hegenberger Loop
Oakland, CA - 94621

Ref: Former Cryer Boatyard at 1899 Dennison Street, Oakland, CA

Dear Mr, Cowley:

I am in receipt of a limited subsurface investigation report, dated June 5, 1997 prepared by GeoSolv for the above referenced site. In response to a request for closure, all the pertinent documents were reviewed and the site was evaluated for closure:

In 1990, soil samples on site were analyzed for metals. The average metal concentrations on-site were less than the Region 9, Preliminary Remediation Goals (PRG's). In 1991, the soil samples were analyzed for oil and grease, diesel, solvents and metals. 840 ppm of oil and grease, 5000 ppm of diesel and 5.8 ppm of arsenic were detected. No solvents were identified in the soil samples

During the investigation performed in 1993, metals were not identified in the soil samples in concentrations above the PRG's. Also, gasoline and BTEX were not detected in significant concentrations. In 1996, arsenic was found in concentrations above the PRG's in the soil samples. Also, 5.9 ppm and 0.15 ppm of gasoline and BTEX were found in the soil samples respectively. In the groundwater sample collected from location #1, diesel was identified up to 20000 ppb and benzene up to 55 ppb.

Since no groundwater samples were analyzed for metals, upon request from this Department, two groundwater samples were collected in May 1997 near the previous boring locations #3 and #6. Arsenic, barium, nickel and antimony were identified in the groundwater. The concentrations of metals found in the groundwater samples were less than the maximum contaminant levels (MCL's) for all the metals except for antimony. Also, groundwater samples collected near previous locations #1 and #2 were analyzed for BTEX, MTBE and diesel and except for insignificant concentrations of xylene and toluene, no other contaminant was identified.

Please submit a site specific risk assessment within 30 days to evaluate the potential risk to human health and the ecosystem due to the residual contaminants present on site. The risk assessment should be based on the current or/and future use scenario for the site. Please note that since the site is located near the bay, both threat to human health and the eco-system will be considered in the final evaluation.

Also, this Department is aware that a pile of metal slag is present on site. Please submit information on the source of this metal slag and an update as to when and how the slag will be disposed.

If you have any questions, you may reach me at (510) 567-6764.

Sincerely,

Madhulla Logan

Madhulla Logan
Hazardous Material Specialist

C: **David Henderson,** Cushman and Wakefield, 1 Kaiser Plaza, Suite 250, Oakland, CA - 94612
Leroy Griffin, City of Oakland Fire Department, Oakland, CA
Frank Goldman, GeoSolv, 643 Oregon Street, Sonoma, CA - 95476
Diane Heinze, Port of Oakland, 530 Water Street, Oakland, CA - 94604

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

R02789

STID 205

January 25, 1997

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

Ms. Diane Heinze
Port of Oakland
530 Water Street
Oakland, CA - 94604

Ref: Former Cryer Boat Yard. Port of Oakland, 1899 Dennison Street, Oakland, CA

Dear Ms. Heinze:

I am in receipt of the report " Soil Investigation of Former Cryer Boat Yard ", dated May 22, 1995 prepared by Clayton Environmental Consultants for the above mentioned site. Based on the review conducted by this Department, the following concerns still need to be addressed:

- The report indicates that a phase I assessment of this property was conducted in January 1995. A copy of this report should be submitted to this Department.

- Soil samples were collected from eight locations at depths of one to four feet below ground surface. The analytical results indicate that concentrations of lead (up to 720 ppm), copper (up to 9100 ppm), and mercury (up to 25 ppm), exceeded the Region 9 Preliminary Remediation Goals (PRGs). Based on this information, the extent of contamination has not been defined near Sb-3 and Sb-2. At least two borings should be installed in this area to define both the lateral and vertical extent of contamination. Also, two additional borings should be installed along dry rock rail to define the extent of contamination found in boring SB-7.

- Some of the metal concentrations identified in the soil samples exceed 10 times the Soluble Threshold Limit Concentrations (STLC). Hence a groundwater survey should be conducted to determine if the groundwater quality has been affected by the contaminants in the soil via leaching.

- Based on the results of the investigation, a remediation plan should be submitted to this Department or a risk assessment should be conducted to determine if the residual contaminants identified in the soil and groundwater (if any) pose a threat to public health or the environment.

Please remit $1500.00 to establish a deposit-refund account. This deposit is authorized by Alameda County ordinance code section 3-141.6 to cover expenses incurred by county personnel for their oversight duties. Records are maintained for the time County employees commit to a project and the deposit will be debited at the rate of $94.00 per hour for any time dedicated to your project. Any money remaining in your account at the end of the project will be refunded. Additional monies may

be needed if the project exhausts the fund. Please submit a check payable to "Treasurer, County of Alameda" with the words "Site Mitigation" written on the check for proper credit. Also, please make sure to include the complete address of the site for which the deposit-refund account is being established.

Please submit a workplan addressing the above listed issues within 30 days from the date of this letter. If you have any questions regarding this letter, you can reach me at (510) 567-6764.

Sincerely,

Madhulla Logan

Madhulla Logan
Hazardous Material Specialist

C: **John Buzzone,** Clayton Environmental, 1252 Quarry Lane, Pleasanton, CA - 94566

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

✓R02849 (SLIC)
R0608 (LOP)

January 25, 1993

Oliver Rubber Co.
1200 65th St.,
Oakland, CA 94662

Attn. Dave Kuehn

Re: FIVE-YEAR PERMITS FOR OPERATION OF UNDERGROUND STORAGE TANK (UST) AT 1200 65th St., Oakland, CA 94609

According to our records the above mentioned facility has not received a five-year permit to operate UST's. Please complete the following items marked below and return them to me within 30 days. The example plans enclosed should be used only as guidelines and may not meet your requirements under Title 23.

✓
-> 1. Complete UST PERMIT FORM A - one per facility. (enclosed)
-- 2. Complete UST PERMIT FORM B - one per tank. (enclosed)
-- 3. Complete UST PERMIT FORM C - one per tank if information is available. (enclosed)
-- 4. A written tank monitoring plan. (enclosed)
-- 5. Results of precision tank test(s) (initial and annual).
-- 6. Results of precision pipeline leak detector tests (initial and annual).
-- 7. An accurate and complete plot plan. (enclosed)
-- 8. A written spill response plan. (enclosed)

Title 23 of the California Code of Regulation prohibits the operation of ANY UST without a permit. Please feel free to contact Brian P. Oliva at 510/271-4320 if you have any questions which may arise in completing the mandatory five year permit process.

Sincerely,

Brian P. Oliva

Brian P. Oliva, REHS, REA
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney
Rafat Shahid, Assistant Agency Director, Alameda County Department of Environmental Health
Ed Howell/files

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

✓ RO 2849 (SLIC)
RO 608 (LOP)

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

December 1, 1992
STID# 1330

Mr. Ron Kessler
Oliver Rubber Company
1200 65th Street
Emeryville, California 94608

RE: Additional Investigation/Remediation at Oliver Rubber Company - 1200 65th Street, Emeryville, California 94608

Dear Mr. Kessler:

The Alameda County Department of Environmental Health, Hazardous Materials Division has completed review of the "Project Update, Phase II Activities for the Oliver Rubber Company", dated October 21, 1992, and submitted by Aqua Science Engineers.

Soil borings SB-1, SB-2 and MW-1 (all borings taken at 10 feet bgs) showed non detect levels for the following target compounds: total petroleum hydrocarbon as diesel (TPHd), benzene, toluene, ethylbenzene, xylenes, and oil & grease. It appears that the extent of soil contamination associated with the former bunker oil tank is limited to the area approximately 5 feet in distance around the tank excavation. The three sidewall samples collected after limited overexcavation during the tank removal activity exhibited significant levels of petroleum hydrocarbon contamination: SW-N (1500 ppm TOG, 490 ppm TPHd); SW-W (670 ppm TOG, 390 ppm TPHd); SW-S (1300 ppm TOG, 1300 ppm TPHd).

The levels of contamination that remain in the soil around the tank pit requires further remediation to non detect levels before the site can be recommended for case closure to RWQCB. In addition, groundwater monitoring well samples must exhibit four consecutive quarters of non detect levels of target compounds.

However, if no remediation will be conducted to reduce the levels of soil contamination at the site, the following items must be performed:

* Long term monitoring of wells at the site
* Risk assessment to determine the impact and/or threat to the public health and the environment
* Deed restriction on the property
* Feasibility study which must show all alternative methods of remediation applicable to the site and their corresponding cost (which method is economically feasible for the site)

√R02849 (SLIC)
RO 608 (LOP)

Per my telephone conversation with Steve de Hoppe of Aqua Science Engineers on November 30, 1992, it is my understanding that overexcavation will be performed around the three sidewalls with petroleum hydrocarbon contamination. Verification samples must be collected and analyzed for TPH diesel, benzene, toluene, ethyl benzene, xylene and oil and grease. The excavation pit must be backfilled with only clean fill. Please notify this office at least 48 hours in advance when overexcavation will commence so that a site visit can be arrange during the sampling.

This department has not received the complete report on the groundwater contamination assessment performed on October 1, 1992. The report must be submitted to this office **no later than December 11, 1992.**

Until cleanup is complete, you will need to submit reports to this office and to RWQCB every three months (or at a more frequent interval, if specified at any time by either agency). In addition, the following items must be incorporated in your future reports or workplans:

- a cover letter from the responsible party or tank owner stating the accuracy of the report and whether he/she concurs with the conclusions and recommendations in the report or workplan

- site map delineating contamination contours for soil and groundwater based on recent data should be included and the status of the investigation and cleanup must be identified

- proposed continuing or next phase of investigation / cleanup activities must be included to inform this department or the RWQCB of the responsible party or tank owner's intention

- any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained

- historical records of groundwater level in each well must be tabulated to indicate the fluctuation in water levels

- tabulate analytical results from all previous sampling events; provide laboratory reports (including quality control/quality assurance) and chain of custody documentation

All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project. Copies of reports must also be submitted to :

Rich Hiett
RWQCB, San Francisco Bay Region
2101 Webster Street, Fourth Floor
Oakland, California 94612

Because we are overseeing this site under the designated authority of the Regional Water Quality Control Board, this letter constitutes a formal requests for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency or RWQCB.

Please contact me at (510) 271-4530 if you have any questions concerning this letter.

Sincerely,

Susan L. Hugo

Susan L. Hugo
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health
Rich Hiett, San Francisco Bay RWQCB
Mark Thomson, Alameda County District Attorney's Office
Edgar B. Howell, Chief, Hazardous Materials Division - files
David Allen - Aqua Science Engineers, Inc.
2411 Old Crow Canyon Road, # 4
San Ramon, California 94583

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

✓R02849 (suc)
✓R0608 (LOP)

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

September 24, 1992
STID# 1330

Mr. Ron Kessler
Oliver Rubber Company
1200 65th Street
Emeryville, California 94608

RE: Oliver Rubber Company
1200 65th Street, Emeryville, California 94608

Dear Mr. Kessler:

The Alameda County Department of Environmental Health, Hazardous Materials Division has recently reviewed the files concerning the removal of three underground storage tanks at the referenced site. This office is also in receipt and has completed its review of the " Workplan for Groundwater Contamination Assessment" dated September 10, 1992 submitted by Aqua Science Engineers Inc.

Based on this review, this department concurs with the basic elements of the workplan. However, the following issues must be addressed before the workplan can be implemented:

* Soil sample (SW-W) collected after limited overexcavation in June 25, 1992 on the west wall of the former bunker oil underground storage tank excavation still showed considerable levels of contamination. Total petroleum hydrocarbon as diesel (130 ppm), oil & grease (450 ppm), benzene (19 ppb), toluene (6.7 ppb), xylene (33 ppb) were detected. The lateral extent of soil contamination in the area west of the former bunker oil tank excavation must be determined.

* Stockpiled soil from the former bunker oil tank contained significant levels of semi-volatile organics, specifically 2-Methylnaphthalene (0.38 ppm). Analysis of the soil and groundwater samples collected in the area of the former bunker oil tank must include Method 8270 for Semi-Volatile Organics in addition to Total Petroleum Hydrocarbon as diesel (TPH-d), oil & grease (O & G), and benzene, toluene, ethyl benzene, xylene (BTEX).

* Please explain how the protocol for one soil sample per hole will be selected for laboratory testing. Soil samples must be collected every five feet as per RWQCB's guidelines. Field instruments are acceptable as a screening tools only. Any evidence of soil contamination such as odor, visual staining or field instrument readings must be verified by analysis from a state certified laboratory.

✓R02849 (SUC)
R0608 (LOP)

* Groundwater elevation readings must be performed every month for twelve consecutive months and reduced to every quarter after the first year. Groundwater monitoring wells must be sampled on a quarterly basis and analyzed for target compounds. MW-1 must be analyzed for TPH-d, BTXE, semivolatile organics (8270), oil & grease. MW-2 and MW-3 must be sampled for TPH-g, BTXE and volatile organic compounds (8240). After four quarters of non detectable levels have been achieved, the frequency of sampling events will be evaluated and/or a recommendation for signoff/case closure by RWQCB will be determined.

* Please submit a time schedule for all phases of the investigation and remediation activities and the anticipated time when cleanup will be completed at the site.

A report must be submitted within **30 days** after completion of this investigation. Until cleanup is complete, you will need to submit reports to this office and to RWQCB every three months (or at a more frequent interval, if specified at any time by either agency). In addition, the following items must be incorporated in your future reports or workplans:

- a cover letter from the responsible party or tank owner stating the accuracy of the report and whether he/she concurs with the conclusions and recommendations in the report or workplan

- site map delineating contamination contours for soil and groundwater based on recent data should be included and the status of the investigation and cleanup must be identified

- proposed continuing or next phase of investigation / cleanup activities must be included to inform this department or the RWQCB of the responsible party or tank owner's intention

- any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained

- historical records of groundwater level in each well must be tabulated to indicate the fluctuation in water levels

- tabulate analytical results from all previous sampling events; provide laboratory reports (including quality control/quality assurance) and chain of custody documentation

✓R02849(SUC)
R0608(LOP)

All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project. Copies of reports must also be submitted to :

Rich Hiett
RWQCB, San Francisco Bay Region
2101 Webster Street, Fourth Floor
Oakland, California 94612

Because we are overseeing this site under the designated authority of the Regional Water Quality Control Board, this letter constitutes a formal requests for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency or RWQCB.

Please contact me at (510) 271-4530 if you have any questions concerning this letter.

Sincerely,

Susan L. Hugo

Susan L. Hugo
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health
Rich Hiett, San Francisco Bay RWQCB
Mark Thomson, Alameda County District Attorney's Office
Edgar B. Howell, Chief, Hazardous Materials Division - files
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