

7/24/97 Spoke w/Tom: he thinks that they should settle it themselves. We don't decide who is responsible for which portion of contam cleanup. We name everybody as Rps. Prop owner, and party who caused the contam are both Rps. He is willing to contact Binayak, but it won't be this week.

7/29/97 Doug Oram phoned: He spoke w/Redevelopment Agency, Andrew Clark Clough, and Kevin Graves, who was encouraging. His agency has written comfort letters before. Location of site and the history of vacancy is of interest to RWQCB. This site may be a pilot project for RBCA standardization that City is trying to do. Andrew will talk to the Redevelopment people, and may find potential buyers. We will wait for Andrew's word. Wants a mtg before end of August. 283-7077

Steve Craford of OFD phoned Barney: 238-7758 Wants to know about this site. Spoke w/Steve Councilmember Nancy Nadel contacted him bec she wants the buyer to be able to buy the property.

7/30/97 Reviewed 6/6/97 "Second QR" by EA. GW sampled on 4/15/97 flowed N to NW (consistent) at 0.003 ft/ft. Up to 16,000 ppb benzene and 26,000 ppb TPHg and 40 ppb MTBE (MW26), and up to 150 ppb 1,2-DCA (MW28). Which wells did they sample? MW3, MW26, and MW28. Work for 3rd Q includes sampling MW2, MW3, MW6, MW25, MW26, MW28, MW29, MW30 and MW32. We have an increase of 1,2-DCA in MW26 and MW28 this Q. Also increase of Hcs in MW26.

11-26-97 Steve Craford of OFD phoned  
372-4418. Has a buyer.  
11/29/97

~~Benigh Kachellu~~  
Binayak Acharya

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copy of the brochure.

5/6/97 phoned Robert Cave of BAAQMD: 415-749-4949 is a fax #. His real # is 415-749-5048. Left message. Mess fm Rbt Cave: Known as Water's Bill (maxine Waters). Will fax regs, altho it's not very specific; just says they must issue public notice to parents of students and residents w/in 1000 ft of any source of toxic air contaminants located w/in 1000 ft of outer boundary of a school. It's also in H&SC Sect 42301.6 "before an air pollution control officer can issue a permit, . . ."

7/18/97 Ralph Lee of PSC Assoc.(env cons HO in Mtn View) Phoned: 415-821-6688: His client is a potential buyer. 1820-10th St. Recycling Co. Duong family; Cal. Waste Solutions; just got 7 yr contract w/City; wants bigger site. He wants to do a file review. Referred him to JB. Told him file is very big; ask for LOP file.

7/24/97 Doug Oram phoned: The deal fell through (again). He wants a framework where Nestle discloses the problem so that prospective buyer knows it has been reviewed by AlCo, so that they can broker a deal w/more understanding where liability begins and ends. Its not a typical brownfields site where taxes are not being paid. Nestle IS paying taxes. See 3/25/97 notes w/Doug Oram. Wants ltr to say something like "the prop is \_\_\_ contaminated, as addressed in this report. Nestle has been compliant for regs, and will maintain responsibility for cleanup. AT the time of prop transfer, existing conditions will be documented. Any further contam will become responsibility of the buyer. If site will be maintained as industrial, Nestle will clean up to industrial standards. If it changes to res, Nestle wd not be responsible for that." Told him that sounds like something the 2 sides should agree on. There has been 10 prospective buyers. Binayak has put in at least 2 calls to Tom, who has not returned his calls. **He wants to meet w/County and RWQCB to discuss this.**

System is onsite; waiting for one more (City) inspection for plumbing; had to tie into sanitary sewer. Still waiting for AQMD permit. Public comment period ends on 7/25. Should have permit in a couple weeks. Had a public mtg; about 12 people showed up. Doug was there, Robert Cave fm AQMD. Residents were more concerned about developmt of their neighborhood. Had trial runs both on and offsite. Should start up on 8/11/97.

3/26/97 phoned Doug Oram: got his fax.

Looks like the PRGs are for "tap water" meaning drinking water, and NOT for other types of gw. So they are no more applicable than MCLs.

4/1/97 mess fm Matt Levine: 415-421-3200 (lawyer) he represents potential buyer. Cleanup status? Phoned him: lm, and faxed my 3/25 ltr.

4/2/97 Doug Oram phoned: Binayak wants copies of all correspondence from EE, as mentioned in my 3/25 letter. There are 4 items (#8, 9, 10, and 14). I made copies and sent to Binayak.

Matt Levine phoned: were all the USTs removed? I think so. I think some were closed in place (boiler rm). He went to law sch w/D. Byrne. Has impacted soil been removed or remediated? He means source soils as in soils surrounding the USTs and piping? I dont know offhand. Present status of gw contam? Explained multi phase system. Has plume gone offsite? Told him #s fm 1st QR. Asked for copy of QR. I just copied site maps w/concs, and faxed them to him. That may preclude his need for a file search.

4/8/97 spoke w/Matt Levine: was there ever a RAP? No; the closest docs wd be: 3/96 wp to perform additional site act (3 AS wells and AS/VE pilot test); 7/96 Pdt Recvabl and VE/AS pilot test rpt; and 9/26/96 EA ltr re selection of a pdt recovery system. Some of these are components of a RAP. If his client stepped into Nestles shoes, what wd they be required to do? Good question. When wd this case be transfrd to the RWQCB? If caseworker thought it was too complicated or too big, or if RP requested it. The HVOCs DO make it complicated, but wd the RWQCB give it as much oversight as I am now? I doubt it. Faxed him my 4/9/96 ltr.

5/5/97 Doug Oram phoned:

5/6/97 Doug Oram phoned: they are doing the shop inspection (trial run) on 5/20. Equipment should be delivered on 5/30. He is trying to find out status of BAAQMD permit. BAAQMD is writing a brochure and send it to EA, who will review it. He doesnt know if Nestle/EA will be able to make comments. It will get sent to the residents. The rule (BAAQMD reg) says if there is a school w/in 1,000 ft of site, the residents and parents of students get mailed the brochure. Doug did this about 5 yrs ago in Stockton. Robert Cave is the BAAQMD contact: 415-749-4949. 415-771-6000 is main #. I asked

3/25/97  
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Phoned Doug Oram: he figured that old waste oil UST was source of HVOCs, but it doesn't appear to be. I agree. Told him the first thing I'd do is compare concs to MCLs or other concs. Then find a more appropriate standard. Then maybe do risk assessment.

Multiphase is being built in Turlock. Should be onsite within a month. System has to be tested before it's delivered to EA. EA will go witness the test. BAQMD and EBMUD need additional info on the permits. BAQMD wants to know if there is a school w/in 1,000 ft. There is (thinks it's elementary), so they have to go thru a public mailing. They have address labels printed up for a 1,000 ft radius of the site. AQMD will do mailing. They also want parents of students notified. AQMD will do that part. Air and water will be polished by carbon, then discharged. AQMD is writing the letter. He will get a copy soon, and then send it over here.

He thinks the prop transfer deal is falling thru. So he's wondering about Brownfields. Groping for a way to deal w/this site, once remediation has been conducted. Comfort letters? Brownfields analysis may give buyer better level of comfort. If excavation occurs (inh pathway), what is the risk? Beyond that, what sort of protection must be ensured? Pumping gw. Potential benefits to buyers more than to sellers. Told him to talk to Tom Peacock. He submitted an app for grant \$\$\$. I will talk to Tom.

Spoke w/Madhulla. THERE ARE NO PRGS FOR SOLVENTS IN GW, so do a risk assessment. Can use the equations in Tier 1 to come up w/a RBSL conc. GSI software available.

**DRAFTED LETTER.**

Lm for Tom re Brownfields. How does it work, in terms of giving more comfort to potential buyers?

3/26/97 Received 3/26 fax fm Doug. Nestle's lab DID quantify the concs after all: 120 ppb in MW26, and 250 ppb in E7. Wow! That's more than twice the concs noted as "greater than", meaning >50 and >120 ppb.

Spoke w/Tom: if we get the Brownfields grant, we will be able to coordinate better w/city bldg, plang depts and redevelopmt agencies to ID brownfields sites. Which will let potential buyers/developers know ahead of time which sites are being closed. We will also get \$\$ to do SA (but not cleanup).

3/14/97 Chris Gervais of EA phoned: wants to know when EE sampled Nestle's wells? Found letter fm EE dated 11/4/96, which discusses samplg of MW28 in 1/96 and 7/96. Says the lab results are enclosed; but they are not. They also sampled MW28 on 8/7/95???

Reviewed Container Care file.

Phoned Mark Armstrong: asked him for lab rpt of 7/96 of MW-28.

3/17/97 Reviewed 3/16 fax from EE. Phoned Chris Gervais of EA. Told her that EE sample MW28 on 1/24/96 and 7/96 for HVOCs. Results were 9 ppb 1,2-DCA in 1/96, and 55 ppb 1,2-DCA and 5 ppb 1,1,-DCA in 7/96. Those are the only 2 events that I have information on. She said Nestle is concerned about them sampling the wells without permission.

3/25/97 Reviewed 3/97 "First Q 97 Mon Rpt" by EA. **GW sampled 1/16/97 flowed N-NW at 0.004 ft/ft.** Similar benzene isocon map (without the lines) (fig 4). Interesting TPHg "isocon map" (fig 5), where they included PR53 and PR54; got up to 180,000 ppb TPHg. Fig 6 shows the HVOCs. **Interesting how the concs of 11-DCA and 12-DCA are both greater in MW28 (near Container Care) than in MW26 (near Nestle).**

QUESTIONS FOR EA:

- 1) THE >50 PPB 1,2-DCA CONC. AND THE >120 PPB CONC. WAS IT a typo? Supposed to be < not >? Why couldnt they quantify the concs? **He inquired about this issue; he agrees its unusual to report in this way (>). The lab said they could not quantify those samples. Now Im suspicious, bec its Nestles lab. Doug said there was a reason, but he doesnt know. Joe knows; he deals w/Nestle lab. Joe said they were over their holding time. Why couldnt they quantify it in the 1st place? It pegged out. Can they estimate the conc? Do HVOCs produce chromatograms? He thinks so. . . We can always rerun the samples, even tho the holding times are past.**
- 2) Wd he do an isoconc map for 1,2-DCA and 1,1-DCA? **Wait for this issue (#1) to be resolved.**
- 3) Maybe we should include previous HVOC data for MW28 in Table 4, for more complete data? Data that EE collected: on 1/24/96 and 7/96. **No problem.**
- 4) How about a conclusions section? **No problem. QRS were started by Mark Litzau, without conclusions section.**

well. (There's only about 5 wells they are doing skimming from.) Asked him to still send a 4th QR, with just the NAPL info. Told him the purge sheets are tedious to go thru, and half the dates are chopped off.

12/12/96 Reviewed 11/27/96 letter fm EA re sampling of HVOCs. Looks good!

1/8/97 Rod Blake phoned: 893-0480 His parents own the property. They are in negotiations to purchase Carnation property. Trying to get financing. Nestle will indemnify them. How badly contaminated is that site? Told him I cannot quantify "how bad." Who loans on contaminated properties? Told him they will be doing "multi phase extraction." His prop is UG. Will this remediation rectify his problem? No Mws on his site. Told him the FP is confined to their site. Told him their focus is on the FP, not what is in 16th St. Will it clean up the contam in 16th St.? Told him that drawdown may occur, which may move the contam fm 16th St onto Nestle site. He will not be building onsite. Just repair work (intermodal equipment) above ground. They will tear down bkg pink bldgs on Poplar and 14th Sts (and pretty brick bldg) & leave the shop on 16th St. Then pave over where bldgs were. Will not dig down for basements or footings for new bldgs. **Would we oversee asbestos removal?** Told him about the Clean up Fund and SB562 and advised him to have his lawyer look into it. Got some phone #s from front desk: 540-2417, but it is the wrong #. (DHS Air and Industrial Hygiene) Don Scales at 540-2477 PhD for Asbestos, concerned about bldg materials. Another # fm front desk: 415-744-1069 EPA Toxics Section. Lm for Mr. Bridenback (works w/asbestos). Scott Seery said it was OSHA and AQMD.

Phoned Binayak re status of multi phase system? Should be installed w/in next few wks (all wells around former waste oil UST). Will do QS next week. Site hasnt been sold yet. He can fax me the schedule that Doug wrote. Still needs air permit. Begin install by end Feb, startup 1st wk April. Why wd it take a month between inst and startup?

1/21/97 call fm Mark Frances of NBC Transportation: 645-0010 they are in 2nd position for buying prop. 2nd position bec they got their offer in 2nd. But trying to get their offer ACCEPTED first. Got a loan from SBA. Wants SBA to reduce their requirements re toxic cleanup, so that they can get in 1st place. He wants to do file review, then turn info over to env consultant, who can advise him. Grubb and Ellis is his realtor. Wants to use site for consolidated freight; works for steamship

11/19/96 phoned Binayak: told him it is important that I speak w/Doug today. I will be out of the office 11/20. Told him it is imp't not to sample the stagnant water, but rather formation water. Mess fm Binayak: he left mess on Doug's answering home machine, asking him to call me asap. He also called the office, but nobody was there. He thinks that maybe we should the QS until I can talk w/Doug. Mess fm Doug: With shallow wells like this, they will end up purging most of the volume they usually do for conventional purging. Wants to still use low flow method. If it doesn't work, ie cannot stabilize parameters, will do 3 well volumes. He changed the Mws to sample for HVOCs. Wants to discuss after he talks w/RP. Call him at 930-6634 home #. Spoke w/Doug: they want to add a MW near waste oil UST for HVOCs. They will put a dedicated pump in MW28. Doesn't know min purge vol. Still doing manual FP bailing every 1-2 wks? No, maintaining passive skimmers, and moving them around to wells w/FP. Hopes to be installing the multi-phase ext system soon. They are starting permitting and design and trying to finalize next year's budget for Nestle. AQMD told them it wd take them 2 mo to approve it. He noted how there is clay around MW28. But the boring log shows silty sand for MW28 and MW26. Will fax to him. Copied pages and faxed them.

11/22/96 Bill Motzer phoned: from Hygienetics Env. Services: 430-2843. He spoke w/SOS earlier today. He may be doing work there. He has client who is potential buyer, who thought there was a closure ltr on this site.

Ted Anspacher phoned: he is a realtor, working w/Bill Motzer. Said Nestle Real Estate people told him they already had a NFA ltr, and were getting final closure ltr w/in 2 months. Told him it is not true. Their client just wants to use site for container storage; wants to raze the 2 bldgs, but not our garage along 16th St. Lm Binayak: I spoke w/Doug Oram.

11/26/96 phoned EA: Have they sampled the Mws? NO. They decided to sample more wells around waste oil UST for 8010. Will be 2nd wk Dec. They switch from 3 Mws to 9 Mws, Q to Q. They want to do 8010 in all QM wells, plus additional 6 or 7 Mws around waste oil UST. Why don't we just skip 4th Q, and do all the HVOC analyses in 1st Q 97. He will write me a ltr, listing all the wells they want to do around waste oil UST, and a map. He will outline their annual plan for sampling. Further HVOC sampling will be dependent upon the results fm 1st Q. Still permitting the multi phase system. Asked him to tabulate thickness of FP and amt removed, well by

11/18/96 MW28 is screened from 9 to 27' bgs; that's 18'; that's a fairly long screen, si? SOS pointed out that 1,2-DCA was used as a "lead scavenger in antiknock gasoline," as per Hawleys Condensed Chem Dict by Sax and Lewis. It is also possible that 1,2-DCA is a breakdown product of PCE, TCE, and/or 1,1,1-TCA. However, looking at MW28, PCE (aka tetrachloroethene) has been ND, TCE has been ND, and 1,1,1-TCA was only detected once (at 1 ppb). So there is no evidence that 1,2-DCA exists as a breakdown product of some other solvent. Note that (current primary) MCL for 1,2-DCA is 5 ppb (EPA) and 0.5 ppb (DHS).

Phoned Doug Oram: lm: what is his minimum purge volume (as we discussed in earlier telecon 11/7)? I wanted to confirm that FP is still being bailed every 1-2 weeks? When will the multi-phase extraction system be installed? I dont want them to sample stagnant water.

Lm for Mark A: did he come across a minimum purge vol? Told him about the use of 1,2-DCA as gasoline additive.

Reviewed Oct 96 "3rd Quarter 1996" rpt by EA. Page 1 says "starting on 7/16/96, NAPL was gauged and recovered on a 1-2 wk basis." GW sampled on 8/29/96 flowed N to NW at 0.002 ft/ft (see Fig 5). Similar dissolved concs for MW26: 160 ppb 1,2-DCA, and ND other HVOCs. \*\*\* ID LIKE TO SEE THE VOL OF NAPL REMOVED IN TABLE 2 (OR ANOTHER TABLE): BOTH THE VOL REMOVED ON THAT DAY, AS WELL AS CUMULATIVE VOLUME. PROBABLY NEED TO MAKE ANOTHER TABLE. I understand this will be tedious, since there are approx 21 wells being gauged for NAPL. Maybe they could just do a table of avg NAPL thickness readings and amounts removed by date. Probably can delete App A; many of the dates on these field sheets are cut off, so they are not fully useful. App A is a lot of paper; could at least be double-sided. Schedule of pg 3 is ok (as per my 4/9/96 ltr) except I want to include 8010 for MW27 (annual).

11/19/96 phoned Doug Oram again: they said he was out sick today. Left mess again; same as 11/18. I really wanted to speak w/him prior to tomorrows purging of MW28. I dont want them to sample stagnant water, but rather formation water. (I noted they removed 30.5 gal w/vac truck during last purging on 8/29/96.)

Phoned Mark Armstrong: he doesnt know what time the QS will be. Gasoline additive: yes, he got that message. He said we are finding PCBs in other wells. Minimum purge volume is 2.5 well volumes, as per the article, he thinks. Is he getting ccd on Nestles QRs?



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pump. EPA Reg 10 uses micropurging as their current guidance. Actually, he is not sure. **He will send me GW Remediation article and EPA regs. He wants to micropurge so that Nestle's contam does not further migrate towards Container Care. Did he tell Mark A that? No, bec they "came to an impasse." He will sample 11/20 Wednesday. Time? Dont know yet.**

I THINK THE COMPUTER LOST SOME INFO BET 11/7 AND 11/14.

11/14/96 spoke w/Marmstrong: Nestle is refusing to let him take split samples. Wants County to take them, or require Nestle to take them.

Hmm, I wonder what regs wd cover this? Spoke w/SOS: we rely on the impartiality of the consultants to present us w/good data. **We have no basis for requiring split samples.**

Received EAs transmittal: 3 papers on micro-purging. I have not had time to read them yet.

Phoned MA: he read the Jan-Feb 94 article. There are signif differences. Wells in the article have 5' screen intervals, have dedicated pumps left in place (takes up about 1' of screen), which signif reduces the stagnant water to begin with. They still take 3-5 well volumes, but concs are at 200-300 ppb level. Gist of article is that it is better to purge slowly rather than rapidly, not to purge and sample. OK purge 2-3 well volumes if it is done slowly. But must still equilibrate temp, cond, and pH. Doug told him he would purge <1 gal of water in total. Purging slowly gets you laminar flow, so you do not mix formation water w/stagnant water. ??? He will read the other 2 articles, and fax me a ltr on Monday 11/18.

11/18/96 Mess fm Mark A: he is sending me a one page fax re micropurging. SOS said I need to deflect those forces trying to get me in the middle of this conflict. Let hi know that the State Board and EPA are evaluating whether to even require purging. Doing case studies, due to cost of disposal of purge water. In spite of those articles he has, we have to accept the fact that protocol is evolving over time. As long as the 3 physical parameters are stable, it is ok to sample.

11/4/96 REORGANIZED HISTORIC FILES FROM BOXES INTO FILE ENVELOPES. WE NOW HAVE FILES A TO J.

Mark A. Faxed his letter; got approval from client's atty. He will also fax the GW article. It is from Jan-Feb 1990, pg 68-78.

Re the broken sewer line in the 1/19/90 ltr, was it repaired? Must check notes fm recent site visit. My notes did not mention whether it was closed off. I remember it was very dark in there; hard to see the sump even w/our flashlights.

Reviewed 11/4 letter fm Mark Armstrong. He implores the County to "enforce these regs:" delineate the zero line of 1,2-DCA around MW28, purge a minimum of 4 well volumes prior to sampling, and require Carnation to expedite FP removal and monitoring of the release.

11/5/96 Discussed w/SOS the use of the AlCo Water Districts "GW Mon Guidelines." They are not regs, and only refer to Fremont and Union City anyway. SOS said that it is a good tech resource bec it brings together well, sampling, and other standards derived fm other source (ie CA well standards, LUFT, etc.).

Im for MA: these are guidelines, not regs. Told him we can only require stabilize the 4 parameters: pH, conductivity, temp. Doug said he wd call Mark 2 wks before-hand, when they sample. I wd also like to be onsite. **I must contact Doug Oram and ask him about the micropurging.** Rod Blake had his prop up for sale at one pt, and was getting very low offers bec of the Nestle contam. Why did we see a decrease in 1,2-DCA fm early 94 to mid 95, w/increases bf and after? Breakdown of VC is 100% in 23 days. Breakdown of 1,2-DCA is 23% in 7 days in static water, and for 1,1-DCA is 1-3% in soil in 7 days. (Not too helpful.) **We are not seeing VC or methylene chloride (they were ND in MW28) last Q.** Probably low breakdown rate.

11/7/96 <sup>Spoke w/</sup> Im for Doug Oram: want to talk about the micropurging. Told him the most imp't thing is to stabilize the 3 parameters. He thinks he can stabilize the parameters without purging 3 well volumes. How? He said it depends. How much water will they remove bf first sampling of parameters? About 1 liter. What is that based on? Values fm the literature. GW Remediation (journal). Has a minimum volume. What is the well volume? Also, he can purge at any level of the well they want. With lowering a tube into the well, using a

11/4/96 Mark Armstrong phoned: he drafted a ltr to me w/his concerns for low flow purging method, and zero lines, and FP. Rodney Blake's atty is reviewing letter before it goes out. Spoke w/Doug Oram re purging of MW28 w/low flow method. Wants doc to make sure we get reliable data. He said we would take out about a gallon of water. Mark is concerned we will get ND. Have we accepted AlCo Water District GW Protection Program/GW Monitoring guidelines; (his copy is 2/90)? Pg 19, sect 6.3: gw sampling shall be done: 6.3.2 purging: well bailed to remove 4-10 well volumes. Definitive article is in National GW Assoc Journal around 1992, showing concs increase w/continued purging. Also RWQCB guidelines re purging. Doug said there is new data from the National GW Assoc Journal and from the US Env Protection (journal). But he could not quote him anything or offer to send him anything. **They want to sample MW on 12/15.** If they are concerned they are pulling in contam fm offsite, just purge it w/low flow pump or bail by hand. **He remembers seeing some Nestle reports that said FP had solvents in it.** Some solvents sink. But if solvents are attached to HC, they will remain floating. He is concerned that our well (MW28) is screened in the upper layer, and we are still finding a sinker. He will cc Nestle and EA w/their letter.

Checked my notes for conversation w/Doug re "low flow purging method." Could not find any. There is a difference bet low flow purging and minimum casing volume pugging. Is 1,2-DCA a real sinker, or does it attach to Hcs. BC says it is a sinker. Where is MW26 screened?

REVIEWED AND ORGANIZED THE FILES. Checked hits during waste oil tank removal. There is no tank removal report. The closest thing is the 2/27/89 "Amendment to Unauthorized Release Report" by AGE. Waste oil UST samples shown on Fig 3: samples 1W, 4W, 2E, and 3E. Interesting how they did not tabulate waste oil UST results, but DID the fuel tanks, piping, etc. Must go to App B. Sample 2E was the only one analyzed for 8240. Results were ND for 1,2-DCA; DL was 10 ppm or 10,000 ug/kg. (Isnt that a high DL?) But there was FP in the fuel tank pits. They were supposed to do 8010, but apparently did not, as per their letter. Found 9/12/89 Unauthorized Release Report for PCB Contam (and 1,2-DCA contam) in PR12. They sampled gw and FP in PR12. But COC and lab report does not indicate which sample is which. But there was 1,600 ppb 1,2-DCA in PR12 in 1989. They think the PCB is related to fluorescent light ballasts. Found boring log for MW26 in 9/17/91 HLA rpt: screened from 10-25'bgs.

10/7/96 Reviewed haz mat files: no generator or HMMP file for Nestle (**ask City**). Container Care does have one, tho, which **shows solvents were used**. But it's unknown which solvents, and where in the bldg, and if they ever got into the subsurface. Phoned Britt: he will check the files for Carnation HMMP file. They are in boxes somewhere.

Researched the 1,2-DCA issue. Is it a biodeg product? Of what? Looked at Barney's red binder on a class he took re HVOCs (pre LOP), but it doesn't help. Lm Sum Arigala re this.

10/8/96 mess fm Sum: 1,2-DCA is a breakdown product of TCA. It has a low MCL, like VC. It may have been used as gasoline additive; don't know.

Mess fm Brit: has no file for Carnation. I checked our database: nothing for Gen, HMMP programs. Last insp was 9/17/92 (must have been UST). That's amazing, that we never did a gen or HMMP inspection at this huge facility. How could we miss it? We knew there were USTs. Why didn't we do a generator or HMMP inspection?

Thought to myself: Get Nestle to monitor some MW(s) onsite for HVOCs, ie MW5 or around there.

10/10/96 **ONSITE MTG W/BINAYAK AND DOUG ORAM AND FORMER SITE CHIEF ENGINEER GINO DIMAGGIO**. Walked through the facility along 16th St. and Cypress St. (Not main bldg). See Field report and attached map. Binayak will contact former mechanics supervisor, Mr. Nori Endow, to find out what kind of solvents they used. He used to be in charge of the parts cleaning station. Gino concluded that the liquid in the sumps is rainwater runoff, due to the clogged storm drains and the site topography, which induces runoff to enter the bays in the rainy season. Doug confirmed the site has been under a few inches of water during the winter.

10/28/96 lm for Binayak: did he get in touch w/Mr. Endow? What are those pipes? Disposal of drums partly full of motor oil? Sumps? Mess fm Binayak: he spoke w/Mr. Endow today, but he has a hearing problem. He also spoke w/Doug today. Doug and Mr. Endow are going to meet onsite this week re the AST and pipes coming from the floor. lm for Binayak: I would also like to be present onsite during the mtg. When is it?

10/31/96 **SITE VISIT**. See field notes.

10/7/96 On Friday, Laidlaw will empty purge drums, empty sumps,  
con't old Park drum (FP and water) from VES, FP from bailing.

Re #2) they did consider it at one time, before his time, in 1989 or 1990, but not cost effective. Doug: HLA had estimated 3-4 million \$\$ to excavate soil. Doug just asked Dillard Trucking: 26 to 30\$ per ton to dispose. 10-26,000 yd3. . .so \$300,000 just for disposal (oil-saturated soil to Class 2), and buildings would have to be shored. Most oil is in cap fringe. Nestle prefers not to landfill. Onsite remediation costs not much cheaper. If bldgs were to come down, that sure wd save some costs. One potential buyer now; going to DTSC for file search.

RE #3) Clayey soil in 16th St. Low permeability DG than UG. More sand and silt lenses onsite, which increases the general permeability. Bore log for MW26 and 28 is entirely clay. He doesn't think MW28 is being purged twice per quarter, so the purging may be creating a gradient towards it. But why wouldn't we be seeing any BTEX? Bec HVOCs have more solubility in water, and are less easily biodegradable. He would like to reduce the amt of purging in MW28; do micropurging--based on stabilization of the parameters. More like 3-4 liters, rather than 55 gallons. **Get field data sheets to see how much they purged.** It could be that the HVOCs were due to a single release a long time ago, and it's still there. Lot of CO2 uptake, as measured during pilot test; so that means a lot of aerobic HC degradation. **Speaking of purging, would it help to purge MW26?** It would be a spot-remediation, create a gradient away from MW28.

Doug said that the 9/17/91 HLA Site Char report shows 9 Mws they analyzed HVOCs; the perimeter of the site. They did MW1, 4, 15, 14, 29, 26, 5, 13, 32. They were all ND except 26 and 32. If they do sampling of MW28 for HVOCs, it would not be overpurged. EA locked the wells last Friday. Binayak worried about illicit dumping. They agreed verbally w/Container Care consultant to split samples. But Binayak never heard from them. They don't have a problem w/splitting samples with them.

Talked about the bioslurping. 17 wells have product now. OK to go w/bioslurping.

10/1/96 Reviewed July 1996 "Product Recoverability and Vapor Extraction/ Air sparging Pilot Test Report" by EA. Read the Conclusions. Looks like the AS increased the amt of volatile vapors by at least an order of magnitude, so that they could be removed by VE.

Reviewed 9/26/96 letter fm EA re selection of a product recovery system. Attached is a cost/benefit analysis comparing 4 different FP recovery systems. They recommend multi-phase extraction (aka bioslurping). (It was the most expensive system.) **Why is the increased gradient using multi-phase extraction any greater than that obtained by dual-phase pumping? They both extract water, thus creating a gradient toward the EW.** Doug said that: Bec youre also applying a vacuum in multi-phase extraction, and not in dual-phase pumping.

Left message for Doug Oram Other Issues:

- 1) add HVOCs to MW28 and what is the source of HVOCs? The sumps? Connected to storm drain or sewers? Rodney Blake is concerned;
- 2) have they considered soil overex?
- 3) could the BTEX in MW26 be getting intercepted by utilities in 16th St.? And thats why its ND in MW28? Its quite a big decrease--from 14,000 ppb in MW26 to ND in MW28!!! DTW is approx 5-7' bgs in these wells.
- 4) ask to include 8010 analysis in MW28

Spoke w/Doug Oram: RE #1) dont know; he also saw the sumps and sheens on liquid in sumps; well ask Binayak; RE #2) problem is that youd be digging below the water table. Soils might be fine grained enough to deal with that. Also, wd have to go into the bldgs. How far? They did a rather large excavation around the USTs at one point. No more product anymore in that area, just a sheen. (Effects of overex)

10/7/96 **CONFERENCE CALL WITH BINAYAK AND DOUG ORAM.** RE #1) Can we get a report re 1,2 DCA in MW28? I will ask them for a report. All the HVOC info. They will pump the liquid from sumps, talk to site worker to see what the sumps were used for, grout inlets to the sump. **Id like to arrange to be onsite for the pumping of the sumps.** Pump truck may not want to mix Hcs with solvents. Therefore, they may require sampling before hand. **Please let me know about the sampling so that I could be onsite.** Who would do that? Doug Oram or Ken (EA) may do it. Former site worker George Swanson was comptroller (money guy), and caretaker for past 5-6 years. He does not live onsite. Binayak will look for old drawings. **I will look for old drawings.** We will walk around on Thursday, locate sumps, and take samples if required by Laidlaw.

7/25/96  
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*for Container Care Site*

is the source of the HVOCs? Solvents from parts washing, and what was washed down in the sumps. He saw a small AST onsite, looked like it had oily waste in it from their skimmers or from bailing FP. He was glad to see that. When will he next sample MW28? Does he still want to sample it even after he gets closure? Don't know. He said if they excavated the hot soil 6 yrs ago, they probably wd have had closure years ago, and not spent the \$2 mil that they did. I faxed him 5 pages from most recent QR (1st Q): conc data and the pot map. He will mark the approximate areas of sumps and lifts on the site map, and fax it back. **Did Nestle stop SVE? When? Maybe they should restart it to prevent offsite HVOC plume migration.**

Reviewed general Haz Mat file. We only have a UST file, and it only refers to 2 boiler fuel USTs closed in place which were closed in place in late 1989. We should have a generator file, but it's not even in the database. Bad.

Dave Amrozowicz of Nestle (216-349-5757 x5152) in Cleveland phoned: he has my letter to Binayak, dated 4/9/96. I may have spoken w/Alan Sobaje from Assessor's office. They are appealing the value of property that assessor has figured. But assessor wants more doc saying that Nestle is working to correct the problem, and is expending resources (time and \$\$) to fix the problem. Assessor wants to view some of these documents. He wants to arrange for Assessor to view 6 of these 8 docs. He will speak w/Binayak 7/26 and see if they can copy the reports for Assessor instead of me.

7/26/96 Received and reviewed 7/96 "2nd Q 1996 GW Mon Report" by EA. **They deleted many wells from QS; but they should probably continue sampling MW32. THEY SHOULD ADD HVOCs TO ~~MW28~~ MW28!!!** GW sampled on 6/20/96 flowed NW at 0.003 ft/ft. There has been an overall increase in concs. Is this due to no SVE? When did they stop SVE? And GW extraction?

Phoned Doug Oram: lm. Questions: 1) There has been an overall increase in concs. Is this due to no SVE? When did they stop SVE? And GW ext? 2) have they thought of soil overex? 3) could the BTEX in MW26 be getting intercepted by utilities in 16th St.?

10/1/96 Reviewed 7/30/96 fax showing locations of sumps, lift and paint room. **We should sample in those places (except the lifts--exempt).**

7/12/96 Alan Sobaje of the Assessor's office phoned. 272-3777. He wants to know the status; how long until closure; reports, letters written? He left a message for SH, who gave it to me. Lm for Alan Sobaje at 1:30 pm. We spoke ; he is a real estate appraiser. They are appraising the site. RP filed an appeal bec they thought the assessed value was too high (and therefore taxed too high). RP told him that property is no longer occupied, and has gw contam. Is there a summary report? Told him the file is over 2 boxes in size. He's wondering if the cleanu pwill take longer than they anticipated (15 yrs). He asked what type of compound spilled? Told him we have Tphg, Tphd, and HVOCs in gw. What's the source of the HVOCs? Offhand I don't know; maybe waste oil or separate solvent source. Faxed him my 4/9/96 ltr. Gave him Doug Oram's name and #, bec he could answer better the question of how long cleanup will take.

7/16/96 Met Ken Legge onsite for FP skimmer inst.

7/25/96 Mark Armstrong of EE phoned: **They have seen a six-fold increase in VOCs in MW28 from 9ppb to 60 ppb of 1,2-DCA;** looks like they stopped SVE and went to FP removal only. They sampled it earlier this month. I don't know what continuing source there would be for HVOCs. He said there are a lot of continuing sources. He did a walk thru w/Rodney Blake. He said there's hydraulic elevators, paint room w/sumps (4-5 sumps on the property, some w/fluid in them). Is any of this stuff close to MW28? There is a paint room on the NW portion w/sumps that look suspicious. It may be 1- 200 feet from 16th St. Also 3 sumps and a lift inside NE side of the bldg (probably lube rack area). **Are those sumps concrete lined?** He doesn't know if they discharge to sewer line or storm drain, or just concrete boxes. Maybe increase in concs of HVOCs due to cessation of SVE or gw extraction. Re Nestle: told him we have 3-4 FP skimmers in the wells. They are doing an economic analysis, and are considering bioslurping. **MA: have they considered excavation?** RP for Container Care is not going to stand still while Nestle contam migrates onto his property. It's above the MCL. I told him that they sampled MW27 in 2nd Q, and got 6.8 ppb 1,2-DCA. Rodney Blake of Container Care is considering buying the Nestle site. What does he want to do there? Level all bldgs, and make room for the containers. **Mark would excavate for remediation, if he were in charge.** But Rodney doesn't want that, bec the site wd be unusable. They've seen how long it takes to do SVE, gw treatment. Told him that hydraulic lifts are exempt fm state regs. He said there's animal fat (ie milk) in the gw. He'd like to do a chromatogram to see what's in the gw. **What**



comes in. And report should be to me asap, certainly earlier than the end of July! Our mtg was on 4/9, and they said they'd do a month of FP removal, and then report to me. Well, it's been nearly 3 months! I told him there has been too much delay on this project! We need to do interim remediation; there is a significant amt of FP! Re my question about "Low mobility," they do not mean the product (gasoline), but rather the fact that its not moving into the wells quickly. This may be due to geology, hydrostatic pressure, well screening, etc. Figure 7 is on same page w/ Fig 8.

7/1/96 conference call w/Binayak and Doug Oram: Binayak will get a copy of that report (Results of Air Sparging pilot test and free product recovery) on 7/10. Doug said that as water level increases, more FP is available in wells and can be recovered. They are doing an economic analysis. They want to keep bailing monthly, and on 3 wells that have generated the most FP, (not necessarily the greatest thicknesses) to install skimmers (E5 is 4", E0 is 4" and PR21 is 2"). I asked how about PR34? It had 5.10' FP in 2/96. Maybe share a skimmer between PR21 and PR34. He would move skimmer to the well w/greater thickness, monthly. Maybe more often in the beginning. They were able to recover more product from PR21 (17 liters) than PR34 (11 liters). They are both 2" wells. **We decided to put skimmers in each well. Also E5 and E0.** How soon can we do this? Within a week or so; by 7/12. I asked Doug to let me know at least a day in advance before they install the skimmers. They are considering other ways of recovering FP (bioslurping). This is an interim measure. . . . Re the last sentences on page 2 and page 5: When you try to recover FP, looking at petroleum industry standards, you get 40% back as the upper limit. We wont see the effects of what were doing today for a long time. They met w/a prof at Colorado State Univ, who is helping them decide on 4 ways of recovering FP: passive skimming (or bailing), enhanced skimming w/a vacuum, dual phase pumping (pump both water and product to create a gradient towards extraction well), bioslurping (may have the greatest effect on all the zones where NAPL exists) and recovers 3 phases--water, vapor and NAPL.

7/11/96 Doug Oram phoned: they sampled MW27 in the street for the first time (at least in a long time) recently, and got 6.8 ug/L (ppb) 1,2-DCA, and was ND for TPHg, BTEX, TPHd. OK to wait until 1st Q 97 to resample. They had to replace the well box on that well. Will install skimmers in FP wells on 7/16 at 1:30pm.

5/2/96 Reviewed April 1996 QR by EA. GW sampled on 3/12/96 flowed N-NW (consistent) at 0.003 ft/ft, and had similar concs. . . except less benzene and Tphg in MW26. They removed the FP from 17 wells (of 42 that were gauged) on 2/27/96, then gauged them on 2/29 to determine the thickness of FP that recharged into the wells.

6/10/96 Reviewed May 1996 "Draft Interim Product Recoverability report," prepared by EA. It was received on 5/31, but was actually due the first wk of May. They say that to date, FP has not been directly recovered (pg 1). HLA estimated 25,000 gal FP on 7/9/91 (pg2)!!! They say the FP likely has low mobility, and is NOT recoverable to any great extent using conventional methods (ie passive recovery, bailing, or dual phase pumping)(pg2). Note the occurrence of FP is not consistent from well to well over time (pg5). More FP can be removed when the GWE is higher (pg5). FP is currently being gauged and removed fm wells weekly for four weeks. . .the final report will be then prepared and will contain conclusions and recommendations. If FP continues to recover into these wells, passive skimmers will be installed (pg 5).  
Questions: 1) why is this a DRAFT report? The cover letter indicates its a FINAL. 2) why do they say the FP has "low mobility" on pg 2? Its gasoline w/BTEX, no? 3) where is Fig 7? 4) They want to use passive skimmers (pg5), but they already said that passive recovery is not very effective (pg 2).

Phoned RP Binayak:

6/14/96 After 3 messages fm RP, I phoned RP again, and left detailed message: the points above (except #1), plus: waiting for a report on results of weekly free product removal (pg 5).

6/25/96 Virginia Lasky from DTSC phoned from Region 2 in Berkeley (540-3817). She wants to know what the status of the case is. Why is DTSC looking into it? Bec they suspect there may be a problem other than Hcs here. They have records that show they might have been handling other haz mats, although nothing specific was mentioned. (So whats the interest?) She is planning to do a file search anyway. Told her the file is 2 boxes big.

6/27/96 spoke w/Binayak: Doug Oram is up in Alaska on business right now, but promised report to him by mid July, and to me by end July. They finished FP bailing. Water level is down now, so its labor intensive to remove FP. I asked him to keep bailing FP weekly anyway, at least in wells with the highest thicknesses, until report

4/9/96

well, and recover fluid (FP and water), but can maintain a certain water level (static or below that) (advantage). Recovers FP from formation more efficiently than passive methods. Dependent on site geology. Finer grained sediments work best. BA suggests going to site where they (EA) are already doing this. They want to consider this bioslurping along w/VES and AS. AS/VES combination pilot test was positive. Tested 22 wells, air sparged in 2 wells. Only 2 AS wells. Equipment to do bioslurping is expensive, due to disposal costs of extracted water, but it works faster. **Nestle wants to sell site asap.** I should get report re FP recovery by first wk in May. Also pilot test results. EA has to look at data more, esp increase in vapor conc due to AS. Bioslurping also removes FP, vapors and some water. Binayak will call Friday. Vadose zone has relatively little volatile fraction that can be recovered w/VES. JE brought up the high concs in MW26. And noted how MW27 is cross-gradient. Well box on MW27 is frozen tight, rusted shut. They'd have to jackhammer it out, and replace the well box. **We agreed to replace well box on MW27 and sample next Q (June 96), for TPHg, Tphd, BTEX, and 8010.** If ND, hold off until first Q 97. BA asked about adding MTBE? Guidelines are recommended. **Will start weekly FP recovery next week.** We will talk in one month. They will fax or mail a brief letter report after a month, before we talk. **Are they in the Cleanup Fund?** Yes, category D. No reimbursement yet for this site. Their number is 1,\_\_\_ something. They have 9 sites in CA. JE: urged RP to contact SWRCB re funding reimbursement, and to ask them if their projects are reimbursable. We will talk in one month.

I told them about File Search and EPA's phone call.

**Wrote letter to RP**

5/2/96

messages fm Doug Oram: FP recovery report should be to me by end next wk (5/10). SVE/AS pilot test report also is delayed. Phoned Doug Oram: told him I received the 4/96 QR today (apparently hand delivered). Told him it's ok to submit the 2 reports one wk late. He is overnighting the FP report to Nestle. Should be there Mon am (5/6). SVE/AS report is taking longer. To Nestle by 5/20. Did they begin weekly FP removal? (As per my 4/9/96 ltr?) YES. Did first 2 rounds. FP recovery report will report 1st round. Last round on 5/15. How is it going so far? He hasn't even looked at it.

4/2/96 Binayak lm: Sorry they did not include oil recovery test results. EA will send that report. They are doing field tests (AS) this week. 818-549-5948 phoned Binayak: since the recovery is so low, it may not be worthwhile to install skimmers, but rather hand bail. When was the last time FP was bailed? They never hand bailed it. Only when they did oil recovery test. He suggested conference call next week. Mark Litzau was laid off.

4/8/96 Cathy Goldforth from EPA phoned: 415-744-1169 wants to know status of site? Who's doing cleanup? (Nestle) Remediation status? She's had a lot of inquiries about this site. How much will it cost to clean it up? Potential buyer. Told her the buyer and seller cd work out agreement to indemnify the buyer.

4/9/96 CONFERENCE CALL W/BINAYAK AND EA CONSULTANTS DOUG ORAM:  
DO: did pilot test last wk, FP recovery testing. FP recovery test: removed FP, came back 2-10 days later to regauge wells. Did it in 12/95, GWE was low, did not get much recharge. Except 2 wells. The thickness reported in QR was before purging (1.5' in E-5 on 12/18/95). They removed 3 gal of FP from E5, and thickness went down to 0.05 ft. Next day removed 1 liter more FP (down to 0.02 ft). Then on 12/28/95, they found 0.19 ft FP in E5. On 2/27/96, there was <0.3ft FP in E5. **He suspects FP is draining out of sand pack, rather than formation. Seems to be 4 different types of wells:** E wells (no screening info); PR wells (product recovery), 2 types: screened 4-15'bgs and some screened 6-15'bgs; then the V wells (vapor ext) screened to surface; then 2 large diameter (RW) wells. 2/96 test was different; GWE rose about 4'bgs, so is now approx 6'bgs. **Found thicker FP: highest is PR34: 5+ feet.** Five wells had >1ft FP. 2 days after FP removal, found 1.2ft. They will get me a report asap. Decided FP recovery is too slow. *They had very different results when installing the AS wells. One was unusable, bec they had fine sands brought into the screen when developing the well. Others had clay. Most of site is clay w/sands mixed in. What do they propose for FP?* They will initiate monthly FP removal by peristaltic pumps. Binayak suggested doing it weekly, and check to see how fast it is recovering. They will fax tabulated data to me, then we will renegotiate how often to do this. DO agrees, and suggests a passive recovery system in addition might help. . . noticed the FP was moving into wells where they were extracting air, during pilot test. **Bioslurping technology** is total fluids and air recovery. Stinger tube goes down into well, and can extract FP and usually water and vapor. Put vacuum on

- 3/4/96 lm for Binayak: I'd like to continue w/the FP plume maps. Got QR, etc.
- 3/5/96 spoke w/M. Litzau: he wants to do a sparge test, but some of the wells are not screened good for this, so they want to add a few sparge points to do the test. Like HP points; that size; 1.25" diameter; 3-5 points. He will get me a map w/FP shown pictorially, like Park's old maps. Also wp. RE MW26: maybe it's a cycle. Next QS in a couple wks. Maybe an anomaly. He thinks the plume is stable. How often are they doing FP recovery? Monthly, by hand bailing. Lead geologist will take over some of the field work. Christa Marting. Wp should be here early next wk.
- 3/12/96 Christa Marting phoned: wants to overnight the wp to me by 3/13. Told her I may not be back to office til 3/18, possibly 3/15.
- 3/15/96 spoke w/Mark Litzau: the wp is only for a pilot test. He wasn't sure if I needed to review it. Can he go ahead w/the work? Yes. He will submit the wp, but go ahead w/the work regardless of approval. OK. BC does it this way, too.
- 3/27/96 Reviewed 3/96 wp by EA. Plans to install 3 air sparge wells, do air sparge test in conjunction w/SVE test.
- lm for Christa: (Mark Litzau is no longer w/EA) when will they install pumps and skimmers in FP wells? How does that aspect of remediation fit in w/the AS and SVE?
- 3/28/96 Doug Oram returned my call to Christa. lm (detailed) for Christa again She is just doing well installation. Doug Oram is new PM. Spoke w/Doug: they did FP removal in 12/95 and 2/96. Plans to do it again during QS in 6/96. Looks at 30 wells; FP is in 17 of them. Most wells are too small (2" diam) to install pumps, and FP recharge too slow to do pumping. Plans to install skimmers after next QS. He asked about Container Care site. Told him it's ND for 3 Qs. But CC site has concerns re Nestle site. And is sampling MW28.
- Told him I'd like to bail FP more often than we are, preferably weekly, until the skimmers are installed. He will look at the data, and get back to me w/in a week.**

7/28/95 Phoned Park Env: spoke w/Daron Robertson: (Dick Zipp was not in). I noted how MW3 concs have increased dramatically in past 2 Qs. He'll include tank locations in future reports. They sampled again in June 95: MW3 had 3,700 ppb TPHg, 4,700 ppb benzene, and 120 ppb TPHd. RE Feb 95 graph on Fig 4, he'll check to see if FP was averaged or what?

11/16/95 spoke w/Binayak Acharya: they want to sell prop. Getting new consultant. Wants mtg. 12/4.

11/21/95 Reviewed Aug 95 "Second Quarter" Report by Park. GW sampled on 6/9/95 had up to 3.54' FP (PR-34), which is an overall increase in this well (from 0.66' in 11/93). FP thicknesses have been rather inconsistent in general. See Table 3. . . . Max concs were 10,800 ppb TPHg, 310 ppb Tphd, and 14,000 ppb benzene (MW-26). GW flowed N-NW at 0.003 ft/ft. . . . There has been an increase in benzene over the last 3 Qs in MW3, MW26, and MW32. Park has no explanation (see pg 4).

I should be getting progress reports on the remediation system.

I have extra copies of Qrs that they can have back.

Phoned Binayak: I asked him for VES Progress Report. He has one dated 5/95, and will send via Fed Ex. It should be here Mon 11/27. Also he's waiting for latest QR by Park. They've been doing VES for almost 2 yrs. Wants to be more pro-active, bec wants to close site. Instead of VES for FP, maybe do direct FP removal. Well screens may be incorrect for VES.

11/22/95 tel con w/Gary Hall of Park re reports

11/28/95 Reviewed November 95 "Third Quarter 95" report by Park. GW sampled on 9/21/95 flowed North (they say N-NW) at 0.0017 ft/ft, and had up to 1.41' FP. Avg FP thicknesses have decreased this quarter. They also note substantial increases in benzene in MW3 over the last 3 (actually 4) Qs, but cannot explain it. The FP plume looks like it is migrating to the North!!!

Questions for our mtg:

1. What do they mean by "soil product volumes?" See pg 3 in Nov 95 QR. Does this mean the total volume of FP in soil? How does that compare to FP in water?

2. Look at avg FP thickness over time. Have they done this? I added a column onto Table 3 in the Nov 95 QR.