

State Water Resources Control Board

Division of Clean Water Programs 1001 I Street • Sacramento, California 95814 P.O. Box 944212 · Sacramento, California · 94244-2120 (916) 341-5678 • FAX (916) 341-5806 • www.swrcb.ca.gov/cwphome/ustcf



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Grav Davis Governor

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.swrcb.ca.gov.

Rita M. Robińson 13199 Skyline Blvd. Oakland, CA 94619

Dear Ms. Robinson:

Alameda County DEC 0 2 2002 Environmental Health

UNDERGROUND STORAGE TANK CLEANUP (FUND); STAFF DECISION; CLAIM NO. 17343; CLAIMANT: RITA M. ROBINSON; SITE ADDRESS: 5630 SAN PABLO AVE., OAKLAND

The Purchase Agreement, specifically Page 4, item no. 9, does not meet the requirements of a Co-Payee agreement pursuant to the Board Decisions in In the Matter of Hollis Rodgers and Emily Van Nuys Trust, J. Benton Van Nuys Trust, and Kate Van Nuys Page Trust (Hollis Rodgers), Order WQ 99-02-UST and In the Matter of Quaker State Corporation (Quaker) Order WO 97-06-UST.

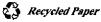
Background

On August 31, 2000, you entered into an Agreement of Sale with Mr. Rosenberg to sell the property in "As Is" condition for \$175,000. It is unclear when escrow actually closed, however, the parties agreed escrow would close as soon as possible and "no later than fifteen (15) days following either written removal or waiver of Buyer's inspection/testing contingency"(see page 3, item 3). A September 18, 2002, letter provided by Annette Carter-Peoples of Cap Real Estate and Tax Services stated that escrow closed on the property on September 19, 2000. A copy of the actual grant deed showing legal that title was transferred to Mr. Rosenberg has not been provided.

Page 4, item number 9 of the Purchase Agreement states:

"Buyer further understands that the property has been utilized as a gasoline service station and repair facility for many years and that underground or groundwater contamination is likely. Buyer assumes sole responsibility and risk as to the condition of said property or the purposes for which the property may be used or developed. Without limiting the foregoing, Buyer expressly assumes the sole responsibility and risk of any soil contamination existing on the property as of the date of closing (whether due to leaking underground storage tanks, tanks or associated piping or any other cause whatsoever). Buyer shall indemnify, defend, and hold Seller harmless from any claim, demand or suits arising out of alleged soil or groundwater contamination respecting said property."

California Environmental Protection Agency



Applicable Law

In the Board decision, *Hollis Rodgers*, the Board held that "on behalf of" agreements may not be used to circumvent the priority scheme or to unravel the provisions of a release or indemnity. Similarly, the Fund has permitted persons to advance money to claimants for cleanup where there was an express agreement in place before costs were incurred, where the agreement had merit, and was not a means to circumvent eligibility or priority requirements, and where the claimant was not being compensated for filing the claim. The Fund has not, however, permitted other responsible parties to advance money to claimants when doing so would constitute a clear circumvention of eligibility requirements or the priority scheme. Based on the requirements set forth in the Board decision, *Quaker State*, costs incurred on the claimant's behalf without an express agreement in place prior to the costs being incurred will not be reimbursed.

Section 2812.3. (e) of the Petroleum UST Cleanup Fund Regulations states "Owners and operators may designate a representative as a co-payee for payments from the Fund. In such cases, payments from the Fund will be issued jointly to the respective owner or operator and the designated representative."

Discussion

The Purchase Agreement states that Mr. Rosenberg indemnified you as the Seller of the subject property after the date of close of escrow from any responsibility for cleanup of the site or groundwater contamination. Mr. Rosenberg purchased the property "As Is" and assumed all responsibility for the cleanup of the existing contamination beginning from the date of close of escrow. Once escrow closed on the property, you had no further right to reimbursement from the Fund

The Fund received your claim application in July 25, 2002. Included with the application was a request to add Mr. Donald Rosenberg as a Co-Payee. In order for you (the eligible claimant) to "add" Mr. Rosenberg on the claim as Co-Payee, you must be an eligible claimant.

Since Mr. Rosenberg indemnified you through the Purchase Agreement, you no longer maintained any right to any further reimbursement from the Fund. In other words, at the close of escrow, you as the Seller had no viable right to further reimbursement from the Fund. The Buyer, Mr. Rosenberg, could not incur costs on Seller's behalf pursuant to the Co-Payee Agreement because Seller was indemnified from further responsibility to cleanup as specifically stated in the Purchase Agreement (Page 4, item 9). In other words, upon close of escrow, Buyer incurred costs on his own behalf not the Seller's behalf.

It is important to note that the Fund can only reimburse eligible costs paid by and/or on behalf of the claimant. Costs incurred by parties other than the claimant without any undertaking (executed agreement) on the part of the claimant are not considered as being on the behalf of the claimant and cannot be claimed.

California Environmental Protection Agency

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Rita M. Robinson

The *Hollis Rodgers* decision determined that a claimant cannot use "on behalf of" agreements to circumvent the priority scheme or to unravel the provisions of a release or indemnity. In this case, the Co-Payee Agreement specifically states that the Buyer agrees to incur costs on behalf of the claimant when in fact the Purchase Agreement specifically states that the Buyer as a co-payee all responsibility for cleanup. Therefore, claimant's request to add the Buyer as a co-payee is denied since the co-payee Agreement unravels the terms of the purchase agreement which is prohibited under *Hollis Rodgers*.

-3-

Conclusion

This claim is ineligible to participate in the Fund. Pursuant to Petroleum Underground Storage Tank Cleanup Fund Regulations, Section 2810.1(a) states in part... "Only a current or former owner or operator of an underground storage tank or residential tank who has paid or will pay for the costs being claimed may file a claim against the Fund."

If you have any questions, please contact me at (916) 341-5714.

Sincerely,

ORIGINAL SIGNED BY

Shari Knieriem Claims Review Unit Underground Storage Tank Cleanup Fund

cc: Mr. Steve Morse RWQCB, Region 2 1515 Clay Street, Ste. 1400 Oakland, CA 94612 Ms. Donna Drogos Alameda County EHD 1131 Harbor Bay Pkway, 2nd Fl. Alameda, CA 94502-6577

California Environmental Protection Agency

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Gray Davis Governor

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.swrcb.ca.gov.

AUG. – 6 Rita M. Robinson 13199 Skyline Blvd Oakland, CA 94619

AUG 1 3 2002

UNDERGROUND STORAGE TANK CLEANUP FUND (FUND), REQUEST FOR FURTHER DOCUMENTATION DURING INITIAL REVIEW: CLAIM NUMBER 017343; FOR SITE ADDRESS: 5630 SAN PABLO AVE, OAKLAND

After reviewing your claim application to the Cleanup Fund, we find that the following additional information is needed to determine your eligibility for placement on the Priority List:

D Please provide your Schedule E from you 1040 Federal Tax Returns.

D Please provide a copy of the 1967 removal permit from the Oakland Fire Marshall.

NOTE: Failure to respond to this request within thirty (30) calendar days from the date of this letter may result in an ineligibility determination of your claim.

If you have any questions, please contact me at (916) 341-5714.

Sincerely,

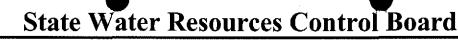
ORIGINAL SIGNED BY

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Protection The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.swrcb.ca.gov.

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Donald Rosenberg P O Box 2194 Walnut Creek, CA 94595

Winston H. Hickox

Secretary for

Environmental

UNDERGROUND STORAGE TANK CLEANUP FUND (FUND), STAFF DECISION TO REJECT CLAIM: CLAIM NUMBER 017054; FOR SITE ADDRESS: 5630 SAN PABLO AVE, OAKLAND

Your claim has been found to be <u>ineligible</u> for placement on the Priority List for the following reason:

An eligible claimant must have owner or operated the subject USTs. A Removal Permit was issued by the City of Oakland in 1967. It appears that the USTs that are subject of this claim were removed in 1967. Therefore, you never owned or operated the subject UST.

The Petroleum Underground Storage Tank Cleanup Fund Regulations, Section 2810.1.(a) states in part..."Only a current or former owner or operator of an underground storage tank or residential tank who has paid or will pay for the costs being claimed may file a claim against the Fund..."

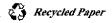
In addition, the subject claim application was deficient in providing the documentation required to complete the application. The missing documentation includes: (1) a regulatory directive, (2) Request for Assignment for Priority Class B, (3) appropriate tax documents, (4) original signature for page 7, and (5) City of Oakland's Removal Permit

NOTE: Sections cited are found in the Petroleum Underground Storage Tank Cleanup Fund Regulations, Title 23, Division 3, Chapter 18, of the California Code of Regulations.

If you disagree with this Staff Decision, you may appeal to the Division Chief pursuant to Section 2814.1 of the Petroleum Underground Storage Tank Cleanup Fund Regulations. If you would like review of the decision by the Fund Manager, please submit your request along with any additional documentation to:

Allan V. Patton, Fund Manager, Claim #017054 Underground Storage Tank Cleanup Fund State Water Resources Control Board Division of Clean Water Programs P.O. Box 944212 Sacramento, CA 94244-2120

California Environmental Protection Agency



Donald Rosenberg

A request to the Fund Manager must include, at a minimum: (1) a statement describing how the claimant is damaged by the prior Staff Decision; (2) a description of the remedy or outcome desired; and (3) an explanation of why the claimant believes the Staff Decision is erroneous, inappropriate or improper.

If you do not a request review by the Fund Manager within thirty (30) calendar days from the date of this letter, the Staff Decision will then become final and conclusive.

If you have any questions, please call me at (916) 341-5714.

Sincerely,

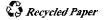
ORIGINAL SIGNED BY

'JAN 2 4 2002

Shari Knieriem Claims Review Unit Underground Storage Tank Cleanup Fund

cc: Mr. Steve Morse RWQCB, Region 2 1515 Clay Street, Ste. 1400 Oakland, CA 94612 Ms. Susan Hugo Alameda County EHD 1131 Harbor Bay Pkway, 2nd Fl. Alameda, CA 94502-6577

California Environmental Protection Agency



-2-



DAVID J. KEARS, Agency Director

AGENCY

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

February 16, 2001

Don Rosenberg PO Box 2194 Walnut Creek, CA 94595

Dear Mr. Rosenberg:

Subject: 5630 San Pablo Ave., Oakland, CA 94608 StId 6703

The workplan dated January 10, 2001 by AEI Consultants proposing to install 5 groundwater monitoring wells was reviewed and is approved. Please note that my previous letter to you dated December 22, 2000 requested an incorrect EPA sample preparation method for Total Petroleum Hydrocarbons- Diesel (TPH-D) which your consultant corrected in the aforementioned workplan.

If you have any questions, please call me at (510) 567-6746.

Sincerely,

C:

 \geq -7-Don Hwang

Hazardous Materials Specialist

Edward Wallick, AEI Consultants, 3210 Old Tunnel Rd., Suite B, Lafayette, CA 94549-4157

Rita M. Robinson, 13199 Skyline Blvd., Oakland, CA 94619

File



DAVID J. KEARS, Agency Director

AGENCY

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

December 22, 2000

Don Rosenberg PO Box 2194 Walnut Creek, CA 94595

Dear Mr. Rosenberg:

5630 San Pablo Ave., Oakland, CA 94608 Subject: StId 6703

The workplan dated December 12, 2000 was reviewed. It is approved with the following amendments:

- 1) SB-4 is to be moved close to the property boundary by San Pablo Ave.
- 2) Another soil boring is to be installed upgradient and close to AEI-4.
- 3550 2/8/01 2 ta 3) Include analyses for Total Petroleum Hydrocarbons- Diesel (TPH-D) [EPA 5030/8015]

Provide a site map, which includes the amended location for SB-4 and the location for the additional soil boring. If you disagree with the amendments or have any questions, please call me at (510) 567-6746.

Sincerely,

 \gg Don Hwang

Hazardous Materials Specialist le

C: Rita M. Robinson, 13199 Skyline Blvd., Oakland, CA 94619

> Edward Wallick, AEI Consultants, 2309 Pacific Coast Highway #206, Hermosa Beach, CA 90254

File



AGENCY DAVID J. KEARS, Agency Director

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

December 6, 2000

Don Rosenberg PO Box 2194 Walnut Creek, CA 94595

Dear Mr. Rosenberg:

Subject: 5630 San Pablo Ave., Oakland, CA 94608 StId 6703

We are in receipt of Ms. Carter-Peoples' letter dated November 8, 2000 indicating that the above property was sold on September 19, 2000 to you. Also, the previous owner of the property, Rita M. Robinson, called today to provide a mailing address for you. Please verify that the information is correct. Additionally, please note that my supervisor, Tom Peacock, informed me that only the property owner at the time the leak occurred is eligible to apply for the "Underground Storage Tank Cleanup Fund" for which Ms. Robinson is encouraged to apply. It can provide funding for the cleanup of contaminated soil and groundwater caused by leaking petroleum underground storage tanks. For more information about the fund, contact Cheryl Gordon, State Water Resources Control Board, Division of Clean Water Program, Underground Storage Tank Cleanup Fund, 1001 "I" St., 17th Floor, PO Box 944212, Sacramento, CA 94244-2120; 916/341-5700, fax 916/341-5707.

If you have any questions not pertaining to the fund, please call me at (510) 567-6746.

Sincerely,

Don Hwang (Hazardous Materials Specialist

Enclosure

C: Rita M. Robinson, 13199 Skyline Blvd., Oakland, CA 94619

Annette Carter-Peoples, CAP Real Estate & Tax Services, 4211 Martin Luther King Jr. Way, Oakland, CA 94609

₁∕ File

ABOUT THE UST CLEANUP FUND ...

Approximately 90% of the underground storage tanks (USTs) in this State contain petroleum and a significant number are known to be leaking. To help with the cleanup of these leaking tanks, the UST Cleanup Fund (Fund) was created by the California State Legislature. It provides funding to eligible UST owners and operators for the cleanup of contaminated soil and groundwater caused by leaking petroleum USTs. The Fund can also be used as a mechanism to satisfy financial

bonsibility requirements since federal and state law requires owners and operators of petroleum USTs to show through insurance coverage or other acceptable financial mechanisms that they can pay for cleanup and third-party damages resulting from leaks that may occur.

HOW IS THE FUND FINANCED?

Money for the Fund is generated by a 6 mill (\$0.006) per gallon fee paid by owners who are required to have a permit to own or operate an UST. The fee is based on gallonage delivered to their UST and is collected by the Board of Equalization.

WHO IS ELIGIBLE FOR THE FUND?

mers/operators of petroleum USTs as defined in Section 25281(x) of the California Health and Safety Code and owners of petroleum USTs located on residential property who meet the following requirements:

1. There has been an unauthorized release of petroleum from the UST reported to and confirmed by the regulatory agency.

2. As a result of this unauthorized release, the owner/operator must take corrective action as required by a regulatory agency.

3. The owner/operator must be in compliance with any applicable financial responsibility requirements and any UST requirements.

WHAT DOES THE FUND PAY FOR?

The Fund pays for corrective action and third-party liability costs resulting from the unauthorized release of petroleum from an UST which causes contamination of soil and/or water. Corrective action costs include preliminary site assessment, soil and water investigation, corrective action implementation, and verification monitoring after the cleanup is completed. Only corrective action costs for work performed after January 1, 1988 are eligible.

The Fund does not cover the removal, repair, retrofit or installation of USTs. However, there is a loan program for this purpose available to qualified small business owners through the California Trade and Commerce Agency. However, the loan must be secured before any work is performed.

HOW DOES THE FUND WORK?

Qualified owners and operators of USTs are reimbursed for corrective action and third party liability claims. Claims are processed according to the following priority system:

Class A - Claims by owners of eligible USTs located on residential property.

Class B - Claims by owners and operators of eligible USTs who meet the definition of a small business. Small business means a business that (1) has its principal office located in California; (2) has all officers domiciled in California; (3) is independently owned and operated; (4) is not dominant in its field of operation; and (5) gross revenues from the business do not exceed the limits established by Section 1896 of Title 2 of the California Code of Regulations. Class C.- Claims by owners and operators of eligible USTs where the business employs fewer than 500 full-time and part-time employees, is independently owned and operated, is not dominant in its field of operation, the principal office is located in California, and all officers of the business are domiciled in California.

Class D - all other claims.

WHAT TYPES OF CLAIMS DOES THE FUND COVER?

The types of claims covered by the Fund are:

1. Reimbursement Claims for costs paid or incurred for cleanup work. (Funds are disbursed only after costs are actually incurred or paid.)

2. Third-Party Claims for amounts awarded to a third party by a court approved settlement, final judgement, or an arbitration award by a court appointed arbitrator for bodily injury or property damage. (Default judgments are not allowable.)

WHAT IS MAXIMUM AMOUNT OF FUNDING?

\$990,000 is the maximum amount available from the Fund per occurrence. Claimants are responsible for the first \$10,000 of eligible corrective action costs.

WHERE CAN APPLICATIONS BE OBTAINED?

Claim application packages can be mailed to you by either calling (916) 227-4307 or writing to State Water Resources Control Board, Division of Clean Water Programs, UST Cleanup Fund Program, P.O. Box 944212, Sacramento, CA: 94244-2120.

FOR MORE INFORMATION ...

ABOUT THE FUND ... State Water Resources Control Board

Underground Storage Tank Cleanup Fund P. O. Box 944212 Sacramento, CA 94244-2120 (916) 227-4307

ABOUT THE LOAN PROGRAM ... California Trade and Commerce Agency UST Loan Program 801 K Street, Suite 1600 Sacramento, CA 95814 (916) 445-6733

ABOUT THE FEE ...

State Board of Equalization Environmental Fees Unit P. O. Box 942879 Sacramento, CA 95279-0001 (916) 323-9362

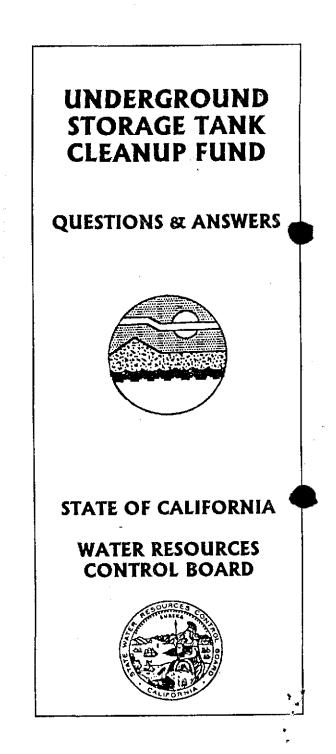
DOCUMENTS AVAILABLE UPON REQUEST ...

- * UST Cleanup Fund Application Package
- * UST Cleanup Fund Statutes and Regulations
- * Underground Storage Tank Regulations
- * Guide to Successful Corrective Action *
- * Financial Responsibility Guide

TO ORDER, CALL (916) 227-4307 OR WRITE TO:

State Water Resources Control Board Division of Clean Water Programs UST Cleanup Fund Program P. O. Box 944212 Sacramento, CA 94244-2120 State Water Resources Control Division of Clean Water Progra UST Cleanup Fund Program P. O. Box 944212 Lacramento, CA 94244-2120

Contact Cheryl Gordon 916-227-4539 re the Fund





AGENCY DAVID J. KEARS, Agency Director

November 17, 2000

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

Rita M. Robinson 13199 Skyline Blvd. Oakland, CA 94619

Dear Ms. Robinson:

Subject: 5630 San Pablo Ave., Oakland, CA 94608 StId 6703

A phase 2 subsurface investigation was performed as part of a real estate transaction. Soil samples collected on July 6, 2000 found Total Petroleum Hydrocarbons-Gasoline (TPH-G) up to 1,300 mg/kg, Total Petroleum Hydrocarbons- Diesel (TPH-D) up to 200 mg/kg, Benzene up to 1.5 mg/kg, Toluene up to 0.5 mg/kg, Ethylbenzene up to 4.6 mg/kg, and Xylenes up to 0.43 mg/kg (BTEX), and Methyl Tertiary-Butyl Ether (MTBE) up to <3 mg/kg. Groundwater samples collected on July 6, 2000 found Total Petroleum Hydrocarbons-Gasoline (TPH-G) up to 620 ug/l, Total Petroleum Hydrocarbons- Diesel (TPH-D) up to 380 ug/l, Benzene up to 12 ug/l, Toluene up to 1.2 ug/l, Ethylbenzene up to 12 ug/l, and Xylenes up to 2.9 ug/l (BTEX), and Methyl Tertiary-Butyl Ether (MTBE) up to <5.0 ug/l.

A soil and groundwater investigation which includes the collection and analysis of data necessary to assess the nature and vertical and lateral extent of the release of petroleum is required due to evidence that groundwater has been affected by the release of petroleum (CCR, Title 23, Div. 3, Chap. 16, Sec. 2724, 2725).

A work plan must be submitted for approval. If you have any questions, please call me at (510) 567-6746.

Sincerely,

g/

war Don Hwang

Hazardous Materials Specialist

C: Peter McIntyre, AEI Consultants, 3210 Old Tunnel Rd., Suite B, Lafayette, CA 94549

File

CAP Real Estate and Tax Services
4211 Martin Luther King Jr. Way Oakland, CA 94609 (510) 985-9700 Office (510) 985-9707 Fax
"SERVICE IS OUR FIRST OFFER"

November 8, 2000

Mr. Don Hwang Environmental Health Services 1131 Harbor Bay Parkway, Ste 250 Alameda, CA 94502-6577

RE: STID#6073 5630 San Pablo Ave Oakland, CA 94608

Dear Mr. Hwang:

We are in receipt of your letter dated October 31, 2000 advising us of the primary or responsible party for the above indicated site.

In response, we spoke to Mr. Tom Peacock, in your absence, and he advised that we respond in writing. This letter is to formerly advise your office that the above property was sold on September 19, 2000 and the new Owner is Mr. Don Rosenberg. This letter will be passed on to him and or his advisors.

If you have any further questions or need more information, please feel free to contact this office.

Sincerely,

Annette Carter-Peoples, Broker Agent for Ms. Rita Robinson

cc: Ms. Rita Robinson Mr. Don Rosenberg

CITY OF OAKLAND FIRE DEPARTMENT Office Of Emergency Services 1605 Martin Luther King Jr. Way, Oakland, CA 94612

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Hazardous Materials Program

Contaminated Site Case Transfer Form

Site Information:

Site Responsible Party (ies)	
Site Name	N/A
Site Address	5630 San Ruble Are. Oak 94608
Site Phone	N/A
Site Contractor & Consultant (if available)	AEI Consultants (Proj. # 3799) Peter Mathiture
(SKE/DBA)	Tel. 925-283-6000

Site Conditions:

	en.,			
UST				
former product (fuel, w/o, solvent, others)? MTBE	Yès	X	No	
observations of system (holes)leaks)?	Yes	×	No	
observed contamination (free product, smell, soil/water discoloration)?	Yes	X	No	
soil and/or groundwater concentrations of contaminants?	Yes	<u>ˈ</u> \	No	
unauthorized Release Form Filed?	Yes		No	×,
future intended use if known?	Yes		No	X
NON-UST	1			
Former industrial use?	Yes		No	
Soil and/or groundwater concentrations of contaminants?	Yes		No	
Future intended use if known?	Yes		No	
If available, attach pertinent reports				

LOP 💢 Transferred as: SLIC 🗌 Level of Update requested: distribution list □ all meetings □ all site visits □ closure sign off 又 all the above Transfer requested by Inspector: H Gomey 10/19/00 Transfer accepted by: (ALCo EHS):_____