



SENT
03-02-05

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

RO0000289

February 28, 2005

Mr. Robert Neal
Owens-Brockway
P.O. Box 1019
Oakland CA 94604

**Re: Workplan to complete a focused geoprobe Investigation at Owens-Brockway,
3600 Alameda Ave., Oakland 94601**

Dear Mr. Neal:

Alameda County Environmental Health has received and reviewed the "January 20, 2004, "Workplan to Complete a Focused Geoprobe Investigation", by Ms. Christina J. Kennedy of CKG Environmental, Inc., along with other documents in our files, regarding the above referenced site.

I have also had discussions with Ms. Kennedy of CKG Environmental during a meeting and over the phone regarding the above referenced site. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- The above report discusses the possibility of closure. This office does not concur with that assessment since there is still floating product around MW-2 and MW-6 wells. There is also concern regarding the plume migration into Fruitvale Ave.
- Provide a plan to remove and or address the floating product issue along with the required items before this case can proceed further. The previous report dated October 17, 2003 does not reveal the concentrations of constituent on the graph for MW-2 and MW-6, while it portrays in Plate 5 that there is in fact floating product in the vicinity of the above wells.
- Most graphs in the 2003 document show rapid reduction of CoC concentrations. There is also some possibility of improper screening of the wells at the site rather than actual reduction in CoC concentrations. This needs to be further investigated rather than accepted at face value

- Develop and submit a Site Conceptual Model (SCM). This must include geological cross sections, interpretive vertical and horizontal drawing of the plume (not just a plot of laboratory results), depth to groundwater, monitoring wells and screens, conduits, groundwater flow and locations of receptors, etc.
- Include a plot plan with all soil borings along with concentrations at different depths.
- Provide a table summarizing all monitoring well analysis along with groundwater depth to water as performed in the field.
- Provide all boring logs including the monitoring wells.
- Plot the concentrations of CoCs above ESL levels in soil and groundwater as discussed.

TECHNICAL REPORT REQUEST

Please submit the following technical reports to Alameda County Department of Environmental Health (Attention: Amir K. Gholami):

March 28, 2004 Work Plan

These reports are being requested pursuant to California Health and Safety Code Section 25296.10, 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

Professional Certification

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration

stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please do not hesitate to call me at 510-567-6876.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Christina Kennedy, CKG Environmental, Inc., 808 Zinfandel Lane, St. Helena, CA
94574

D. Drogos, A. Gholami

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



13-01

November 9, 2001
StID 866/RO0000289

Mr. Robert Neal
Owens-Brockway
P.O. Box 1019
Oakland CA 94604

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

**Re: Groundwater Monitoring at Owens-Brockway, 3600 Alameda Ave.,
Oakland 94601**

Dear Mr. Neal:

Our office has received the October 22, 2001 groundwater sampling report for MW-20 provided by Kennedy/Jenks Consultants. Your cover letter also describes the status of those wells being monitored for the presence of free product. Please inform our office as to the status of the installation of MW-19, which was approved for installation along with MW-20 in my February 24, 2000 letter. Please expedite its installation. We anticipate receiving the annual monitoring report for all pertinent wells soon after your December 2001 sampling.

Your November 7, 2001 letter requests our office's approval to close MW-9 citing damage and likely surface spillage contributing to the product being found in this well. You note, and our office agrees, that the current focus at the site is to remove free product from wells where it exists and continue to monitor boundary wells. Unfortunately, if free product was introduced from the surface, which migrated into the well through damaged surface seals, there is no way to distinguish product originating from surface from that from the subsurface. MW-9 is located near former underground tanks and historically has exhibited free product or elevated dissolved product. I recommend that this well be repaired, better handling practices be observed when handling oily process water and that absorbent pads be changed within this well regularly. If this is done, you would expect this well to clean-up quickly unless there is still a subsurface petroleum source.

You may contact me at (510) 567-6765 if you have any comments or questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Ms. M. Durant, Kennedy/Jenks Consultants, 622 Folsom St., SF, CA 94107

Stat3600 Alameda

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Sent 7-7-2000

20389

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

July 6, 2000
StID # 3284

Mr. Robert Baston
61 Skyway Lane
Oakland CA.94606

Re: Request for the Installation of a Monitoring Well at 1200 E. 12th St., Oakland 94606

Dear Mr. Baston:

Our office approved the All Environmental Inc. work plan for the installation of a monitoring well at the above referenced site on February 15, 2000. We asked to be notified prior to its installation. Haven't not been notified, we assume that this work has not yet been performed. Having allowed more than adequate time for you to schedule this work, **please perform this well installation within the next 45 days or no later than August 17, 2000.**

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. P. McIntyre, AEI, 3210 Old Tunnel Rd., Suite B, Lafayette, CA 94549-415

MwInst1200E12

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 2-24-2000
including CC'S

P0289

February 24, 2000
StID # 866

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

Mr. Robert Neal
Owens-Brockway Glass Containers
P.O. Box 1019
Oakland CA 94604

Re: Work Plan, Owens-Brockway Glass Containers, 3600 Alameda Ave., Oakland 94601

Dear Mr. Neal:

Our office has received and reviewed the above referenced work plan provided by your consultant, Kennedy/Jenks Consultants. This work plan covers the following items:

- The installation of two additional monitoring wells to investigate the release from the underground tanks removed on 10/9/98 and to monitor potential off-site migration of high boiling hydrocarbons in the area of the former fuel oil UST.
- The institution of an annual monitoring schedule for the site. This assumes that groundwater conditions remain consistent.
- The addition of free product removal equipment into monitoring wells.

Our office approves of the work plan with the following conditions and observations:

- It was noted that the well adjacent to KB-5 was labeled as MW-29 instead of MW-19. In addition to TPPH, TEPH and BTEX, please also analyze this well for MTBE, TDS and conductivity. MTBE analysis is required by the Water Board. It may be eliminated if not initially detected. TDS and conductivity should be used to determine if MW-19 is groundwater or infiltrated estuary water.
- MW-17 should also be run, at least one time, for MTBE as required by the Water Board.
- Please provide our office with a list of the passive free removal devices evaluated and your rationale for the selection of the Soakease device. You are encouraged to explore other free product removal devices to optimize collection of product. Please update the progress made in free product removal in your quarterly monitoring reports. Please take groundwater elevation measurements on all wells and generate a gradient map during your quarterly and annual monitoring events.
- Please notify our office prior to your well installations.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Ms. S. Stehling, Kennedy/Jenks Consultants, 622 Folsom St., San Francisco, CA 94107
Wpap3600

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Sent 12/29/99
Including cc's

20289

December 29, 1999
StID # 866

Mr. Robert Neal
Environmental Administrator
Owens-Brockway Glass Containers
6150 Stoneridge Mall Road, Suite 375
Pleasanton, CA 94588-3242

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

Re: Owens-Brockway Plant, 3600 Alameda Ave., Oakland CA 94601

Dear Mr. Neal:

The last time our office spoke with you was during the May 19, 1999 meeting at the County offices. Accompanying you was Ms. Stephanie Stehling of Kennedy/Jenks Consultants. Among the items we discussed were:

- The results of the then recent off-site groundwater investigation
- The issue of the presence of free product in a number of the monitoring wells
- The results of the tank removals overseen by the City of Oakland
- Cleanup requirements for sites near surface water
- Remediation approaches
- A revised monitoring schedule and
- A site Risk Management Plan.

In regards to these items, our office had/has the following comments:

- One of the off-site borings, KB-5, exhibited both TPH as gasoline and as diesel, with the diesel concentration exceeding the recommended San Francisco International Airport clean-up level for near surface water sites. This indicates a real threat to the estuary and requires remediation of the on-site source(s). There is also a need to have at least one permanent off-site monitoring well to verify the concentration of TPH impacting the estuary.
- The November 1998 monitoring event reported free product in monitoring wells 2,5,6,7 & 9. Given the presence of TPH off-site, these wells require remediation, the removal of free product and reduction of dissolved product.
- The results of the underground gasoline and diesel tank removals overseen by the City of Oakland indicate a release of both these contaminants had occurred to the soil. The existing well, MW-17, may be down-gradient of these tanks and its monitoring results may be indicative of the release's impact to groundwater. You need to discuss the merits of the prior data and determine what additional investigation and monitoring is necessary to complete the characterization of the release from these tanks.

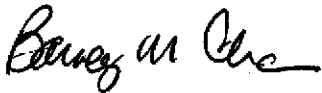
Mr. Robert Neal
StID # 866
3600 Alameda Ave., Oakland CA 94601
December 29, 1999
Page 2.

- It may not be sufficient to only treat the release through the existing wells. You must examine the available remediation alternatives and prepare a Corrective Action Plan (CAP).
- Although all wells may not be necessary for sampling and analysis, you are required to propose and implement a revised monitoring schedule for the site. Your monitoring proposal must justify the elimination of any well.
- A Risk Management Plan will be required to minimize hazards during future activities ie construction, subsurface work , soil and groundwater generation.

Because of the apparent lack of attention to these matters, you are required to provide a written work plan response to this letter within 45 days or no later than February 15, 2000.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Ms. S. Stehling, Kennedy/Jenks Consultants, Marathon Plaza, 10th Floor, 303 Second St.,
San Francisco, CA 94107
Rq3600Alameda

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 289

January 6, 1999
StID # 866

Mr. Bob Neal
Environmental Administrator
Owens-Illinois Glass Container, Inc.
6150 Stoneridge Mall Road, Suite 375
Pleasanton, CA 94588-3242

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

Re: Owens-Brockway Plant, 3600 Alameda Ave., Oakland CA 94601

Dear Mr. Neal:

This letter confirms the implementation of your work plan to install the five off-site borings originally proposed in Kennedy/Jenks November 18, 1998 proposal. My initial suggestion to move one of the borings to an on-site location was to confirm the presence of a fuel oil source, however, this sampling point could not distinguish a release from the former underground tank and the fuel oil pipeline, therefore, it is not necessary. It may be assumed, since free product has been observed in MW-6 and MW-7, the groundwater between these two points is also likely heavily impacted.

Because of the significant impact to groundwater in the southwest corner of this site, the presence of a storm culvert and an underground pipeline soil excavation is not a realistic remedial option. Further, the high boiling fuel oil is immobile and insoluble which should prevent migration. It is believed that if off-site petroleum migration has not adversely impacted the estuary, a limited free product removal coupled with groundwater monitoring would be the best approach for the site. This is contingent on the results of the groundwater samples from the proposed borings. During our on-site meeting, I left copies of the Water Board Order for the former oil recycling plant at 4200 Alameda Ave. and a copy of the Water Board Order for the San Francisco International Airport (SFIA). These documents were intended to give you an idea of potential remedial and risk management approaches and cleanup objectives. We discussed possibilities for the installation of petroleum absorbent devices into the affected wells and their routine maintenance. This should be done immediately, independently from the off-site investigation.

Please submit a remediation/risk management plan within 30 days of the submission of the off-site investigation report.

I have reviewed the underground tank closure report for the recent removal of the diesel and gasoline tanks on the east side of the site. The results of the soil samples indicate that a release of diesel and gasoline has occurred. The sample taken between the two tanks, OBD2, exhibited the highest contamination. I have enclosed an Unauthorized Release Form for you to complete for this site. Please complete it and send it back to our office within 10 working days. Our office considers this release independent from that in the southwest corner of the site. Please include a plan for the investigation of this release in your future site management/remediation plan.

Mr. Bob Neal
StID # 866
3600 Alameda Ave., Oakland CA 94601
January 6, 1999
Page 2.

It appears from the notes of inspector Gomez of the City of Oakland, that groundwater was encountered and appeared beneath the slab anchoring the underground tanks. Why wasn't a groundwater sample taken for analysis?

The presence of free product and elevated dissolved petroleum hydrocarbon in MW-17 may be explained by the fuel release from these two fuel tanks. I noticed on a site may the existence of a sanitary and storm sewer located just east of MW-17. Do you think that these utilities could act as conduits to move contaminants into the estuary? Please comment on this letter in your risk management/remediation plan.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B.Chan, files
Ms. S. Stehling, Kennedy/Jenks Consultants, Marathon Plaza, 10th Floor, 303 Second St.,
San Francisco, CA 94107

RMP3600

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0#289

November 30, 1998
StID # 866

Mr. Bob Neal
Environmental Administrator
Owens-Illinois Glass Container, Inc.
6150 Stoneridge Mall Road, Suite 375
Pleasanton, CA 94588-3242

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

Re: Groundwater Investigation Work Plan for 3600 Alameda Ave., Oakland CA 94601

Dear Mr. Neal:

Our office has received and reviewed the November 2, 1998 Groundwater Monitoring Report as well as the November 18, 1998 Groundwater Investigation Work Plan prepared by Kennedy/Jenks Consultants. I would like to comment on each of these reports individually starting with the monitoring report. It appears that no further work occurred between the January 20, 1998 meeting at the County offices with yourself and your consultants and the November 2, 1998 monitoring event. You are reminded that in my December 3, 1997 letter, I requested that groundwater monitoring be continued on a quarterly basis. It appears that monitoring proceeded well over one year after the last September 1997 event. Our office cannot agree to the recommended annual monitoring of this site given the consistent appearance of free product in the perimeter wells, MW-2, -5, -6, -7 and -9. Our office will require quarterly groundwater monitoring of the wells. You are reminded that our office requested that a sample of the free product found in the wells be analyzed for PCBs, via EPA Method 8080 or 8250. When the results of the off-site investigation are submitted, our office will consider a change in the monitoring schedule if warranted. If the proposed groundwater investigation is performed as soon as proposed, you may recommend a monitoring schedule change prior to the next quarterly event, however, semi-annual monitoring will be required prior to annual monitoring.

Because of the presence of free product and the lack of apparent decrease in groundwater contamination attenuation, you are requested to perform a feasibility study and submit a plan of correction to contain the petroleum on-site. The study should examine a number of remediation options, comparing the cost and benefit of each option. The goal should be to contain plume migration and meet the cleanup requirements for the nearby Alameda Harbor Channel. Draft cleanup standards were distributed and discussed during the January 1998 meeting. Please submit your feasibility study within 30 days of the submittal of the proposed off-site investigation.

In regards to the work plan for off-site investigation, our office requests that one of the five borings be located on-site. A location just east of the storm culvert, between MW-6 and MW-7 would be an appropriate location. You may eliminate one of the borings on Alameda Ave. to keep the same number of borings as proposed. For the on-site boring, it is recommended that a vadose soil sample be collected for chemical analysis. It is also recommended that soil samples be screened in the field for petroleum contamination. Any sample indicating contamination should be analyzed in the laboratory to verify a potential off-site source.

Mr. Bob Neal
StID # 866
3600 Alameda Ave., Oakland 94601
November 30, 1998
Page 2.

It was noted that two USTs were removed from the site on October 9, 1998 under the oversight of the Oakland Fire Department. Please submit a copy of the underground tank removal report to office to complete our records.

Please contact this office 72 working hours prior to any field work. I may be reached at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Ms. S. Stehling, Kennedy/Jenks Consultants, Marathon Plaza, 10th Floor, 303 Second St.,
San Francisco, CA 94107

Mon&wp3600

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 289

October 15, 1998
StID # 866

Mr. Bob Neal
Environmental Administrator
Owens-Illinois Glass Container, Inc.
6150 Stoneridge Mall Road, Suite 375
Pleasanton, CA 94588-3242

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

Re: Request for Technical Reports and Additional Subsurface Investigation at Owens-Illinois Facility, 3600 Alameda Ave., Oakland CA 94601

Dear Mr. Neal:

Our office last met with you and your consultant, Ms. Stephanie Stehling of Kennedy/Jenks, on January 20, 1998. During this meeting we discussed the County's concerns regarding the petroleum release which has occurred at the above site. Our office was particularly concerned with the free product found in monitoring wells MW-2 and MW-6. We were also concerned about potential preferential migration of contamination along the utilities near the site. A work plan to address this concern was to be submitted to our office by February 20, 1998.

A draft site map was provided to our office along with supplemental monitoring well data in a March 16, 1998 letter report from Ms. Stephanie Stehling of Kennedy/Jenks Consultants. To address the off-site migration concern, the draft report proposed five (5) temporary borings located along Alameda Ave. and Fruitvale Ave. These locations were to be discussed to confirm their appropriateness and reality of drilling at them. On March 24, 1998, I spoke with Ms. Stehling and confirmed the appropriateness of the location of the borings. We also discussed the following additional items:

- The proper screening of wells to detect free product
- A proposed monitoring schedule for the wells, tentatively quarterly until further notice
- The need to install passive skimmers into wells where free product was being found and
- The need to install an on-site boring to accurately determine free product thickness. There is a potential problem with the well screen interval in MW-6.

To date, we have not received any additional monitoring reports since the November 1997 report nor have we received a final work plan for the temporary borings. You are, therefore, requested to submit both a current quarterly groundwater monitoring report and a work plan for the installation of off-site borings and discussed the above bulleted items. Your reports are due by November 17, 1998.

This is a formal request for technical reports pursuant to the Water Code and the Health and Safety Code. The failure to submit the requested reports may result in civil liability.

Mr. Bob Neal
StID # 866
3600 Alameda Ave., Oakland CA
October 15, 1998
Page 2.

Please contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Ms. S. Stehling, Kennedy/Jenks Consultants, Marathon Plaza, 10th Floor, 303 Second St.,
San Francisco, CA 94107

Req3600

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#289

December 3, 1997
StID # 866

Mr. Bob Neal
Environmental Administrator
Owens-Illinois Glass Container, Inc.
6150 Stoneridge Mall Road, Suite 375
Pleasanton, CA 94588-3242

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

Re: Owens-Illinois Facility, 3600 Alameda Ave., Oakland CA 94601

Dear Mr. Neal:

Our office has received and reviewed the November 19, 1997 Groundwater Monitoring report prepared by Kennedy/Jenks Consultants for the above referenced site. This report provides analytical results for groundwater sampling collected on September 16, 1997 in accordance to my April 28, 1997 letter. The conclusions from this report were:

- * No HVOCs or PCBs were found in the groundwater samples collected.
- * Separate phase hydrocarbons were present in wells, MW-2 and MW-6.
- * The free product from MW-2 appears to be fuel oil.
- * Petroleum hydrocarbons were found downgradient of the fueling area, consistent with former results.

Please include the following in all subsequent monitoring reports:

- * surveyed TOC measurements on all wells sampled in addition to depth to water measurements
- * Groundwater contour (gradient) map
- * Table of former and current analytical data
- * Recommendations for future actions; and
- * Signature and stamp of a registered professional

Because of the absence of detectable HVOCs and PCBs in the groundwater samples, these parameters may be omitted in future monitoring events. However, because of the presence of free

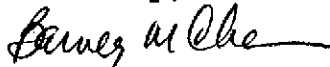
Mr. Bob Neal
StID # 866
3600 Alameda Ave.
December 3, 1997
Page 2.

product in at least two of the wells, our office requests that a sample of the free product be analyzed for PCBs. Because of the close proximity of this site to the Oakland-Alameda estuary, an additional offsite investigation is requested to determine the limits of petroleum plume. Our office suggests the advancement of temporary borings for groundwater sampling.

Please provide a work plan for offsite groundwater investigation within 30 days or by January 5, 1998. At this time, please continue to monitor the same wells on a quarterly basis for the analytes; TPHg, TPHd, TPHmo and BTEX.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files
Ms. S. Stehling, Kennedy/Jenks Consultants, Marathon Plaza,
10th Floor, 303 Second St., S.F., CA 94107

3mon3600

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Ro# 289

April 28, 1997
StID # 866

Mr. Bob Neal
Environmental Administrator
Owens-Illinois Glass Container, Inc.
6150 Stoneridge Mall Road, Suite 375
Pleasanton, CA 94588-3242

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

Re: Owens-Illinois Facility, 3600 Alameda Ave., Oakland CA 94601

Dear Mr. Neal:

Our office has received and reviewed your submittal of information attached to the March 14, 1997 cover letter. Thank you for the report on the current status of the monitoring wells at the site. In regards to groundwater monitoring, I agree that MW-15 is an appropriate replacement well for MW-3, which no longer exists. Therefore, wells MW-1,2,5,6,7,8,9,10,13,17 and 15 should be the well network for monitoring this site. The wells downgradient to the former 4-USTs (MW-17, 13 and 15) should be analyzed for TPH as mo, diesel, gasoline and BTEX as recommended in your letter. The others should be analyzed for these same analytes in addition to chlorinated solvents and PCBs.

This recommendation is based upon analytical data found in Enclosure 6, the February 20, 1987 Exceltech Soil and Groundwater Contamination Investigation report. Recall, in the investigation of the contamination found during the ramp excavation, chlorinated hydrocarbons were detected in soil and groundwater in borings B-1 and B-2 and PCBs were detected in the free product/water samples taken from the same borings. Please initiate groundwater monitoring ASAP. After receiving the results of the initial monitoring event, we can discuss if any change in monitoring is reasonable. At this time, our office does not concur that a risk-based closure is reasonable.

Please keep in mind the requirements for a "low risk groundwater case" stated in my January 15, 1997 letter. In light of the presence of petroleum in monitoring wells reported in your well survey, I question whether the source and free product has been removed and whether the site has been adequately characterized. Groundwater monitoring is not sufficient to demonstrate a stable petroleum plume. If the Oakland-Alameda estuary has been impacted, cleanup levels protective of estuarine life must also be met in addition to meeting those protective of human health.

Mr. Bob Neal
StID # 866
3600 Alameda Ave., Oakland 94601
April 28, 1997
Page 2.

At this point, the source (s) of soil and groundwater contamination has not been determined. It appears that both underground tank and non-UST releases may have occurred. We will consider this site a UST petroleum release site, thus in the LOP, until there is enough evidence of non-UST releases. Nevertheless, our office will oversee all chemical releases at the site. Therefore, in addition to the fuel type analytes, PCBs and solvents warrant analysis.

Please clarify the following items:

Enclosed, please find a map and a list of 18 tanks or collection containers. Please verify the status and locations of these 18 containers. Of importance is the proper documentation of the removal or closure of all non-permitted underground tanks formerly containing hazardous materials. As I recall, submitted in Enclosure 1 were eleven (11) tank registration copies. "Tanks" 15,16,17 and 18 were not actually USTs and did not need registration as is the case for aboveground tanks. Missing was the registration for tank number 8, the fuel oil tank. What about the registration forms for tanks number 3,4 and 5 ?

Please clarify the amounts of soil generated from each of the tank and area excavations and their final disposition. Was the excavated soil disposed or reused onsite?

Please provide an estimate as to the levels of contamination still left in-place.

The above items are necessary when compiling the case summary for site closure. Your co-operation in providing the requested information will expedite future site closure.

Please inform me prior to groundwater monitoring. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

enclosure

c: B. Chan, files
2mon3600

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0289

January 15, 1997
StID # 866

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

Mr. Bob Neal
Environmental Administrator
Owens-Illinois Glass Container, Inc.
6150 Stoneridge Mall Road
Pleasanton, CA 94566-8093

**Re: Status of Site Remediation at Owens-Illinois Facility,
3600 Alameda Ave., Oakland CA 94601**

Dear Mr. Neal:

Thank you for meeting with our office on January 13, 1997 and providing a site visit to familiarize myself with this site. This letter serves to recount the items discussed during our meeting and provide recommendation for a continued groundwater monitoring program.

It was apparent that the reports previously provided by you were not complete. In order to adequately assess this site, it would be beneficial to have as much of the previous reports as possible. To this end, you are requested to provide all other reports and technical information which was not already provided. This may include, but is not limited to, any drawings or plates missing from previous reports, any descriptions of tank closure activities, any analytical reports, site maps and any manifests or receipts for hazardous and non-hazardous waste disposed throughout the investigation. Additionally, you stated that you would provide a written summary of the installation and results from the installation of the additional recovery wells.

As part of one recommended remedial approach for this site, it would be advisable to determine if this site meets the criteria of a "low risk groundwater case". This requires:

1. The leak has been stopped and ongoing sources, including free product, has been removed. To this end, your monitoring should include inspection and removal of any free product.
2. The site must be adequately characterized. To this end, our office requests that you provide an estimate as to the residual soil contamination at the site. The results of the February 20, 1987 Soil and Groundwater Investigation Report currently represents the best estimate of residual soil concentrations.

In regards to the excavation in the ramp area, please estimate what levels of contamination still exist in this area.

Mr. Bob Neal
StID # 866
3600 Alameda Ave.
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Obviously, some soil contamination was removed during the excavation, however to what depths were soil removed and how much contamination still remains?

3. The plume is not moving. This will be verified through groundwater monitoring.

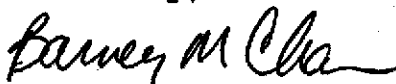
4. The site presents no significant risk to human health or the environment. Based on residual soil and groundwater contamination a Tier 1 Risk Assessment using ASTM Risk Based Corrective Action format (RBCA) can be done. Additionally, since the Oakland-Alameda estuary is immediately downgradient and potentially affected by this release, cleanup levels protective of estuarine life must be considered.

During our site visit, it appeared that not all of the former monitoring wells could be found. Please provide an inventory and status of all existing monitoring and recovery wells. At our meeting, I offered to provide a recommended monitoring schedule to reinstitute. This recommendation assumes the existence and viability of all wells. Please review this schedule and comment as to what, if any, changes you would recommend.

Monitoring wells 1,2,3,5,6,7,8,9,10,13 and 17 are recommended for reinstating of groundwater monitoring. These wells either mark the extent of the petroleum plume or allow for free product removal. The other wells may not require monitoring because of past low levels or non-detectable levels of contamination. A number of the upgradient wells indicate that offsite contamination is not a threat. The specific analytes for the above wells should include Total Petroleum Hydrocarbons as gasoline, as diesel, as motor oil, BTEX and selective wells should be analyzed for PCBs and chlorinated hydrocarbons additionally based on past detection of these analytes.

Please provide comment to the above proposed monitoring schedule and provide the requested documents **within 30 days or by February 18, 1997**. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: B. Chan, files mon3600

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO# 289

November 7, 1996
StID # 866

Mr. Bob Barber
Plant Engineer
Owens-Illinois Glass Container Inc.
3600 Alameda Ave.
Oakland CA 94601

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION (LOP)
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
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**Re: Request for Technical Reports for Underground Tank Removals
and Groundwater Monitoring at 3600 Alameda Ave., Oakland CA
94601**

Dear Mr. Barber:

Our office has received limited information regarding the removal of underground storage tanks at the above site. We have received a May 29, 1987 letter from you to Mr. Rafat Shahid, former Chief of the Alameda County Hazardous Materials Division. In this letter, you state that a 500 gallon, 4000 gallon and 24,000 gallon diesel tank were removed from this site in November of 1986. In addition, a 4,000 gallon gasoline and a 12,000 gallon Kleenmold tank were also removed. A 8,300 gallon lubricating oil tank was scheduled for removal in July 1987. We also have a copy of a March 4, 1987 letter from Mr. Christopher Palmer of Exceltech which describes the results of the removal of two 24,000 diesel tanks. The letter states that although there did not appear to be any visual tank leakage, some apparently contaminated soil from the tank excavation was removed for disposal offsite. This soil was stated to have come from an older leak source and not the 24,000 gallon tanks. Groundwater monitoring wells were installed to monitor the older leak and reports were forwarded to the Regional Water Quality Control Board (RWQCB). The apparent leak report date to the RWQCB was 3/12/87. An Exceltech site map, Figure 1, depicts ten monitoring wells located in the northwest corner of this property in the vicinity of the 2-24,000 gallon tanks.

Please be advised that Alameda County Environmental Health was delegated the lead responsibility for overseeing underground fuel tank investigations and cleanups by the RWQCB on December 7, 1988. Final site closure and sign-off remains the responsibility of the Water Board. Our office oversees these sites on a routine basis and defers to the Water Board when the site is ready for closure and seeks their concurrence. Our office recognizes case closure by issuing a Remedial Action Completion Certificate (RACC).

Mr. Bob Barber
Owens Brockway
StID # 866
3600 Alameda Ave.
November 7, 1996
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In order to expedite the closure of the subsurface investigation at your site, our office requests the following information:

1. The tank closure reports for all tanks removed from this site;
2. Copies of all technical including groundwater monitoring reports;
3. MSDS for all chemicals stored in these tanks;
4. Copies of disposal records of all liquid, solid, soil or other waste material generated from the tank removals; and
5. The current status and location of all remaining underground tanks at the site which contain or may have contained hazardous materials.

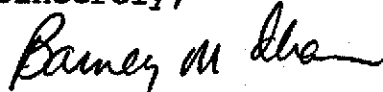
Please submit the requested technical documents to our office within 30 days or by December 12, 1996.

This should be considered a formal request for technical reports pursuant to the Water Code Section 13267 (b) and the California Health and Safety Code sections 25299.37 and 25299.78. Failure to submit the requested documents may subject Owens Brockway to civil liability.

In addition, this site has been transferred to the Local Oversight Program (LOP). A letter explaining the significance and requirements of this action is being sent to you under a separate cover.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: Mr. K. Tinsley, ACEH
B. Chan, files

rep3600A

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

R0289

RAFAT A. SHAHID, Assistant Agency Director

October 19, 1993

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

T. Duwe/B. Barber
3600 Alameda Ave.
Oakland CA 94601

**Re: FIVE-YEAR PERMITS FOR OPERATION OF UNDERGROUND STORAGE
TANKS (UST'S)**


Dear T. Duwe/B. Barber:

According to our records the above mentioned facility has not received a five-year permit to operate UST's. Please complete the following items 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)
9. a copy of your inventory reconciliation data for the last three months.

Title 23 of the California Code of Regulation (CCR) prohibits the operation of ANY UST without a permit. Please be advised that Title 23 CCR requires either installation of automatic tank gauging device in single wall tanks where the ground water level is less than 20 feet from bottom of the tank or getting your stick readings evaluated by Statistical Inventory Reconciliation (SIR) method for tank monitoring by an approved third party company. Please feel free to contact me at (510) 271-4320, if you have any questions which may arise in completing the mandatory five-year permit process.

Sincerely,


Amir Gholami, REHS
Hazardous Materials Specialist

cc: files

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Department of Environmental Health
Hazardous Materials Program
10 Swan Way, Rm. 200
Oakland, CA 94621

R0289

February 6, 1989

~~DEPARTMENT OF ENVIRONMENTAL HEALTH~~
~~HAZARDOUS MATERIALS PROGRAM~~
~~OAKLAND, CALIFORNIA 94621~~
(415) 271-4320

Mr. Howard S. Vallans
Simon, Buckner and Haile
4551 Glencoe Ave., Suite 300
Marina Del Rey, CA 90292

Dear Mr. Vallans:

We have searched our files of Owens Illinois Corporation at 3600 Alameda Ave., Oakland, CA, and found that we do not have any record of a response to this facility in February, 1988 concerning a release of molten glass.

This letter is limited to information available to this department and does not reflect other information which may be accessible to other agencies or businesses involved with this property.

If you have any questions, please contact Edgar Howell, Program Administrator, at 271-4320.

Sincerely,

Rafat A. Shahid

Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:mnc

cc: Edgar Howell
Files