

**Clayton Environmental Consultants, Inc.**

1252 Quarry Lane • Pleasanton, California 94566 • (415) 426-2600

**Environmental Work Plan Report  
and  
Violation Correction Schedule  
for  
Custom Alloy Scrap Sales  
2730 Peralta Street  
Oakland, California**

**Clayton Project No: 26795.00  
December 21, 1989**

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**1.0 INTRODUCTION**

Clayton was contacted by Mr. Leonard Becker, attorney, to assist Custom Alloy Scrap Sales (CASS) in developing an environmental work plan. This plan must address environmental issues identified by the Alameda County Department of Environmental Health (ACDEH) in a letter dated November 16, 1989. The letter summarized the results of an inspection of the site conducted by Mr. Gil Wistar of ACDEH on October 11, 1989. ACDEH requested a work plan from CASS outlining proposed corrective actions that will address the environmental issues related to site activities.

The purpose of this report is to develop a plan of action for the following items that were identified in the ACDEH letter:

- Determine the extent of petroleum hydrocarbon fluids in shallow soils and groundwater
- Determine the extent of heavy metals in shallow soils and groundwater
- Underground tank closure procedures
- Removal of floating diesel fuel from the water table on the property
- Removal of soils affected with petroleum hydrocarbons and metals
- Surface water runoff control provisions
- Collection and storage of waste liquids and solids, including disposal procedures and labelling procedures
- Compilation of a hazardous/flammable materials inventory

- Employee safety and hazardous material handling training, including emergency response, personnel accident notification, and equipment operation procedures
- Posting of safety and hazardous material warning information
- Establishing safety meetings, a site safety officer, and written policies pertaining to safety and environmental protection at the site

Clayton conducted a site inspection on December 1, 1989 to identify site activities related to the items listed above. This inspection was conducted by Mr. Fred Moss, P.E., senior environmental engineer, and Ms. Emma Kennedy, industrial hygienist of Clayton. They were accompanied by Mr. Larry Lorinsky, general manager for CASS.

Based upon our observations and documentation available from CASS, Clayton recommends that CASS implement the procedures and programs detailed in this report. Following is background on the facility and the work plan required in the November 16, 1989 letter from the Alameda Health Care Agency.

### 1.1 FACILITY DESCRIPTION

CASS occupies a site of approximately 6.25 acres, located in the westerly part of Oakland approximately 1.5 miles east of San Francisco Bay and .5 miles south of the junction of freeways I-80, I-580, and I-880 (Figure 1). The site is situated in an area of mixed industrial and residential zoning in the flat topographic plains adjacent to the bay. Surrounding streets are paved and have both underground and overhead utilities, including water, sanitary sewer, storm drain, natural gas, and electricity. The site is bounded by Poplar Street to the east, Peralta Street to the west, 26th Street to the south, and 28th Street to the north (Figure 2).

The facility consist of a work yard area with processing equipment for handling scrap metal, buildings to house office, warehouse, and maintenance functions, and storage areas for bailed metal scrap. The facility is divided into work areas for nonferrous metals and ferrous metals. The latter area is occupied by an affiliated company, referred to as Industrial Turning Processors (ITP), which handles ferrous scrap materials such as pipe, motor blocks, wheels, axles, and other steel and iron scrap. This portion of the yard is earth covered (unpaved). CASS handles nonferrous scrap metals such as brass, copper, zinc, and primarily aluminum in a warehouse and in a concrete paved, outdoor yard (Figure 2).

There are two underground fuel tanks on the property for storage of diesel fuel and gasoline. Each fuel tank has a separate dispenser pump. There are two aboveground tanks used to store diesel fuel and propane. Other oils and lubricants which are supplied in 55-gallon drums will be described in more detail in subsequent report sections.

Metal scrap materials are delivered to the site, weighed, classified, and sorted by plant personnel. Following sorting operations, some of the metals are crushed and compressed into bailed cubes for subsequent resale. Other metal items, for instance, alloys of mixed metallic components, are processed in a heating furnace where aluminum can be segregated and smelted into ingots. The waste products from this operation consists of a froth-like surface residue known as dross and a heavy residual slag material. These waste materials are stockpiled on the concrete pavement and hauled offsite for reprocessing and recycling.

*Is this the only solvent?*

Waste motor oil, hydraulic fluids, cutting oils, and ~~mineral~~ spirits are collected from maintenance operations performed at the property. These fluids are stored in 55-gallon drums at two locations on the property. When a site inspection was performed on December 1, 1989 by Clayton Environmental Consultants, Inc., these drums were stored in steel double-contained spillage trays.

As a small quantity hazardous waste generator (<1,000 kilograms per month), the site has been assigned a number by the Department of Health Services. The identification number for this facility is CAL 000027883.

## 2.0 SUBSURFACE INVESTIGATION

This section explains the subsurface exploratory program recommended to establish the lateral and vertical extent of soil and groundwater contamination.

### 2.1 GROUNDWATER MONITORING

Evidence of floating hydrocarbons fluids (product) has been detected in utility vaults on 26th Street. The source of this fuel has not been established, however, CASS has had an underground storage tank for diesel fuel storage for several years in the southern portion of the property at the location shown in Figure 2.

~~This tank was tested by Clayton on March 4, 1989. Although the tank integrity was confirmed, the piping connecting the tank to the pump dispenser did not pass a pressure test.~~

To establish the extent of floating hydrocarbon fluid on the property, we recommend the installation of seven shallow monitoring wells along the southern property boundary and in the vicinity of the tank and pump dispenser. If preliminary results of floating product measurements indicate that tank or piping leakage has impacted these vaults, a shallow interceptor trench and sump will be installed to capture this product.

Two additional monitoring wells are proposed adjacent to the gasoline tank (Figure 2) to monitor soil and groundwater in the vicinity of this tank. This tank was tested on March 14, 1989, and was found to be pressure tight. The pump dispenser is located directly over the tank, so no piping test was necessary.

Prior to development of a specific remediation plan for removal of floating product, the extent of the product needs to be accurately determined. An interim plan of action could be implemented after review of preliminary findings, however, it would not be efficient or prudent to design a full-scale remediation system until the characteristics of the subsurface conditions are adequately assessed.

### 2.2 SOIL SAMPLING PROGRAM

Only the southwesterly portion of the property (ITP) is not covered with concrete pavement. In this area, metal and oil contamination has been observed but not adequately characterized. There is a railroad siding through this area and it contains large piles of scrap steel. Equipment used in this area and metal components crushed for scrap have resulted in scattering of oil and metal tunings over the ground surface. Surface samples collected by the ACDEH may not be representative of the soil profile in this area. To properly characterize shallow soil and

groundwater in this area, Clayton proposes to dig a minimum of nine shallow test holes or pits to sample soil at 1- and 3-foot intervals. Deeper soil samples will be collected for analysis during the drilling of the three shallow monitoring wells located in this area (Figure 3). Groundwater and soil samples will be analyzed for total petroleum hydrocarbons (EPA Method 418.1), lead, copper, and zinc (EPA Method 6010).

Prior to development of a remediation plan for soil excavation and disposal, the lateral and vertical extent of contamination needs to be established in this area (Figure 2 - Area 5). The nature of the work operations conducted in this area may constrain the extent of sample collection locations and remedial options available. Soils having contaminants exceeding state action levels will be identified and segregated from nonhazardous soil materials on the property.

### **3.0 UNDERGROUND TANK CLOSURE**

The underground diesel tank is no longer used by the CASS operations and has been replaced by a smaller capacity aboveground tank. Clayton recommends removal of this 10,000-gallon underground tank and associated piping, along with remediation of any soil contamination encountered. All diesel fuel remaining in the tank should be drained and removed or transferred to the smaller tank.

Following installation of the monitoring wells near the underground gasoline tank, Clayton will advise CASS concerning available options. These range from closure of the tank, to upgrading this facility, to incorporate automatic inventory monitoring devices.

### **4.0 SURFACE WATER RUNOFF COLLECTION**

Presently no functional system at the site acts to control surface water runoff. Clayton recommends installation of a system of berms and collection sumps on the property to collect runoff. A detailed survey will be performed prior to preparation of a design for this system. The design should incorporate multiple-chambered sumps to allow for removal of oils and sediments containing metallic dusts from the water.

### **5.0 COMBUSTIBLE MATERIAL STORAGE**

All fresh liquid hydrocarbon oils, solvents, greases, and mineral spirits stored at the maintenance shed (Figure 2 - Area 1) need to be provided with double-containment for spill prevention. The 55-gallon drums can be placed upon a special containment pallet of adequate capacity for spill containment.

Flammable materials such as paints, gasoline, and other chemicals were not properly stored in a flammable storage area. These materials should be segregated from welding equipment and gases. Fire extinguishers need to be placed throughout the plant and properly identified by notification signs.

Clayton recommends that proper flammable storage areas be established and posted with adequate warning and notification signs.

## 6.0 OTHER WASTE HANDLING

Small quantities of wastes generated at this facility will be documented, handled, stored, and disposed of according to the following procedures. These miscellaneous waste materials will be deposited in sealed containers, properly labeled, and dated for disposal record keeping. Appropriate testing of these materials will be performed to determine if these wastes should be classified as hazardous. The waste containers will be stored in a designated area at the facility. These wastes include:

- Baghouse dust
- Sawdust absorbent (hydraulic oil)
- Waste oils and fluids
- Metal dust

Liquid wastes will be double-contained in appropriate spill containers with adequate capacity to retain the wastes. Dusts will be collected in drums with plastic sheet liners.

## 7.0 HAZARDOUS MATERIALS MANAGEMENT PLAN

CASS has prepared a preliminary business plan for this facility which was submitted to ACDEH on April 15, 1989. It is unclear which items referenced in the plan have been implemented at this facility. Documentation of hazardous materials inventory and personnel training will be handled by CASS. Clayton will assist CASS in updating the business plan to comply with Section 25509 CCA Health and Safety Code.

Clayton recommends that CASS adopt a written program to include all elements required by the Hazardous Materials Release/Response Plans and Inventory Law, Chapter 6.95 of the Health and Safety Code.

The hazardous materials inventory section will detail (1) whose is responsible for maintaining a current inventory, (2) procedures on how the inventory is updated, and (3) procedures for reporting materials and quantity. This inventory shall include the following:

- A list of hazardous substances used and stored at the facility
- A description of labeling practices, Materials Safety Data Sheets (MSDS), training, etc. used to inform employees about chemical hazards and other safety issues

The employee training and information sections of the written program will be expanded to include (1) the training outline, and (2) personnel responsible for initial and refresher training. This training shall include the following:

- Methods for safe handling of hazardous materials
- Procedures for coordination with local emergency response organizations
- Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment at the facility
- Details of the emergency response plan, including key personnel for notification, action plans for emergency response, and evacuation procedures
- Communications and/or alarm systems, including how to use telephone or paging system
- Response to fires or explosions

- Response to hazardous materials/wastes spills
- Procedures for shutdown of plant operations

The written program will incorporate a section on documentation that details (1) procedures for maintaining training records, (2) what information is needed in these records, (3) who is responsible for maintaining these records, and (4) where the records should be kept.

Clayton recommends that CASS conduct a comprehensive industrial hygiene assessment to evaluate employee exposures to physical and chemical agents.


CASS will also implement a program instructing managers and supervisors how to inform their employees about personal protection equipment and hazardous substance handling.

### 8.0 IMPLEMENTATION SCHEDULE

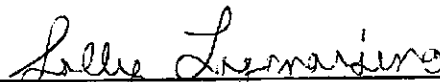
Clayton recommends that the soil and groundwater investigation work begin following acceptance of this work plan by ACDEH. We anticipate completion of the proposed investigation within 3 months of the authorization to proceed. A specific remediation plan will be developed and submitted to ACDEH for approval after the investigation phase is completed and our recommendations have been formulated.

The employee health and safety measures as discussed in Section 7.0 will be implemented by CASS personnel with the assistance of Clayton. A designated safety coordinator will be immediately appointed by CASS to implement the required safety measures and hazardous materials inventory within the next 3 months.

This work plan prepared by:

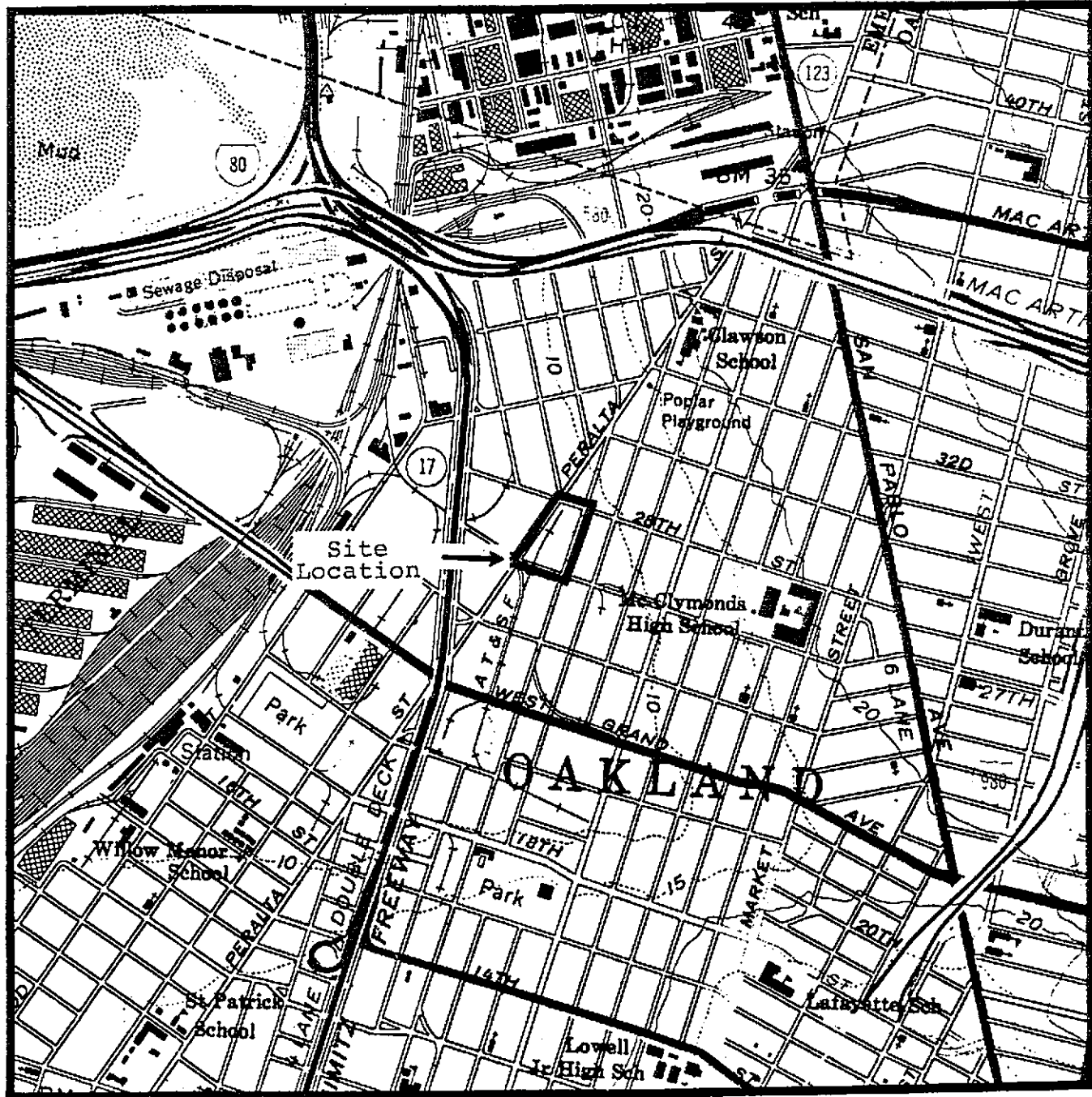
  
\_\_\_\_\_  
Frederick G. Moss, P.E.  
Supervisor, Remediation  
Western Operations

This work plan reviewed by:

  
\_\_\_\_\_  
Sally Lagomarsino, C.I.H.  
Supervisor, Industrial Hygiene Services  
Western Operations

December 21, 1989

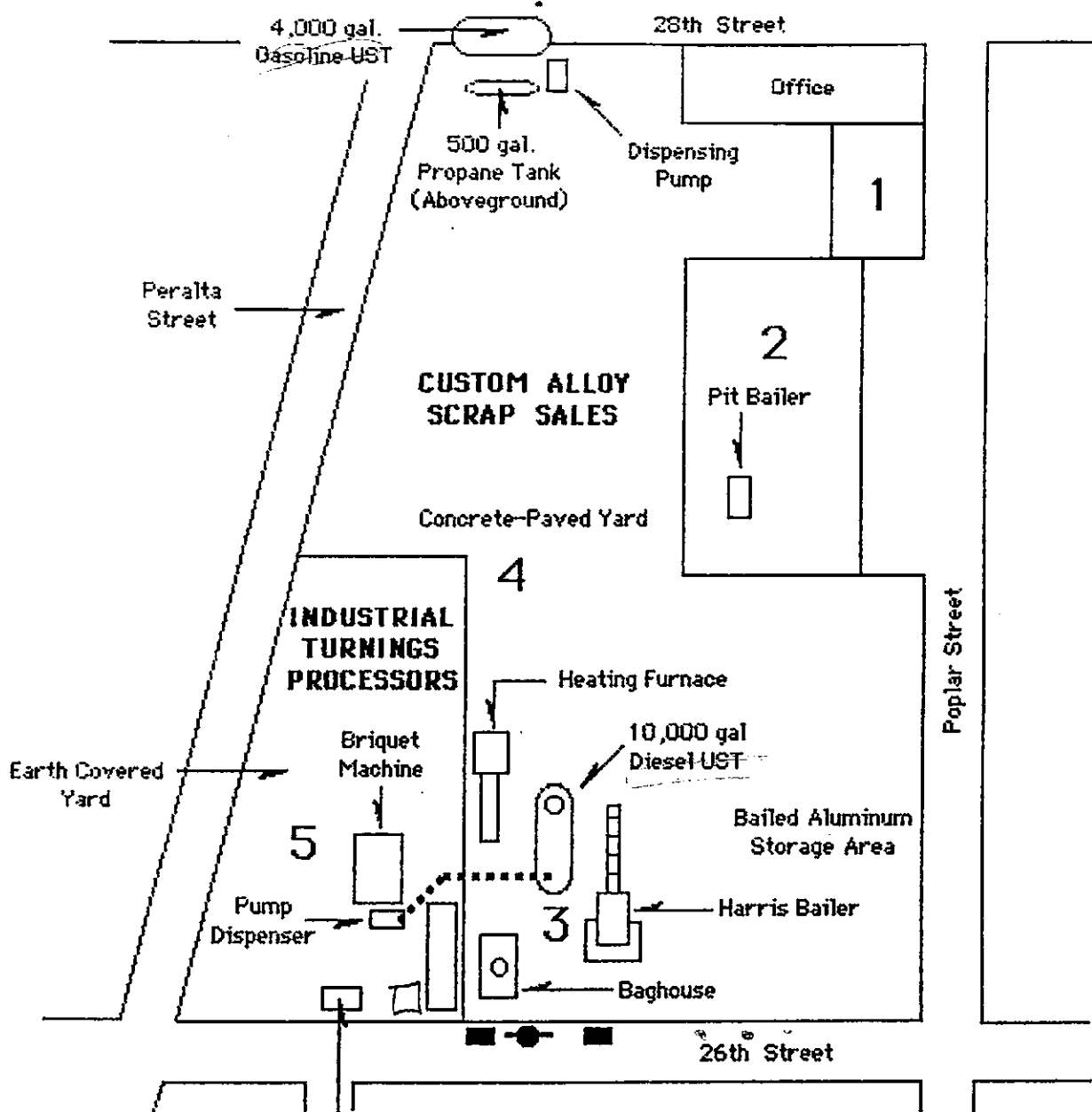




Clayton Environmental Consultants, Inc.  
 Vicinity Map  
 Custom Alloy Scrap Sales  
 2730 Peralta Street, Oakland, CA  
 Clayton Project No. 26795.00

Figure  
 1





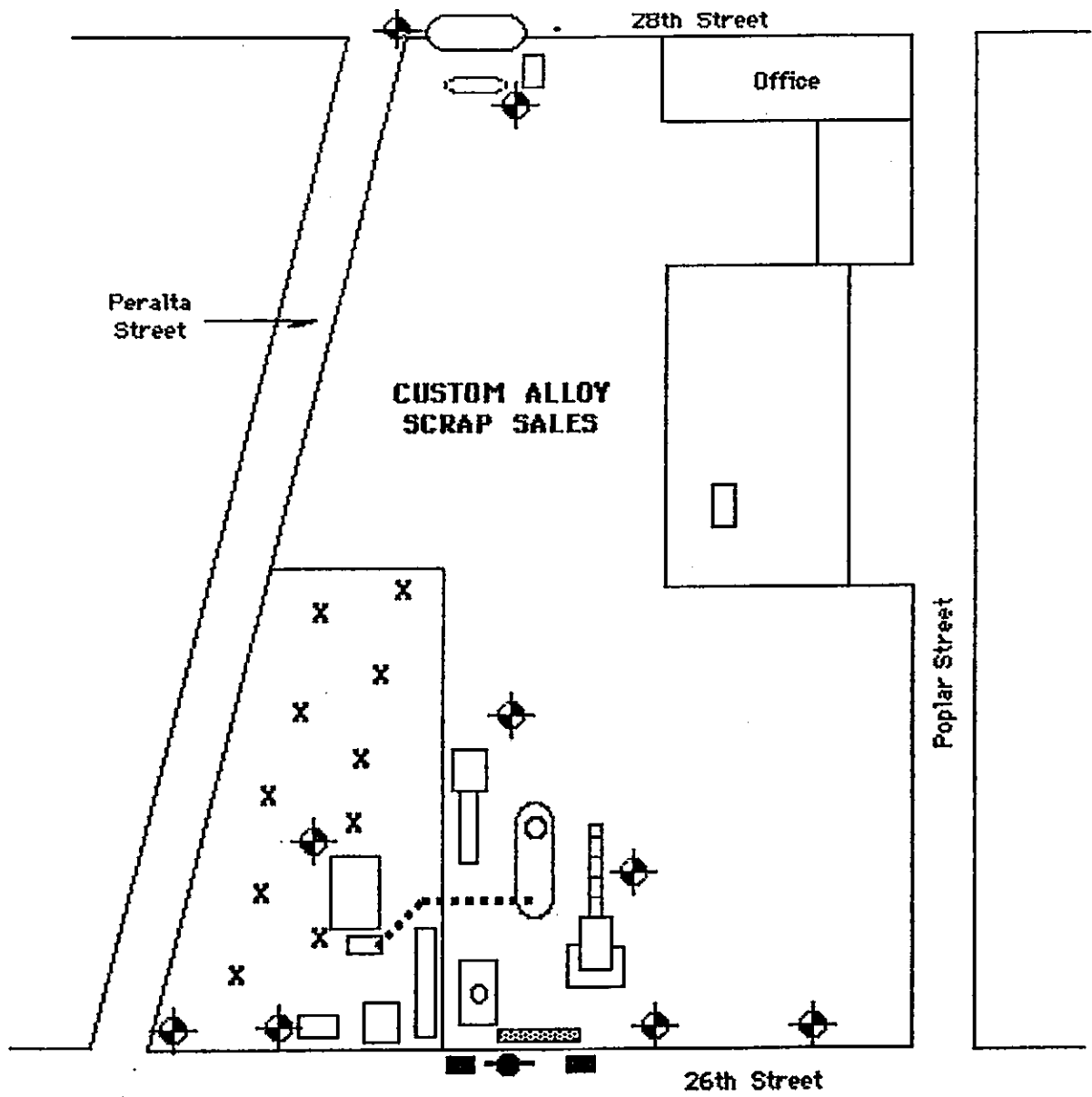
Explanation	
1	Maintenance Shed
2	Non-Ferrous Sorting Warehouse
3	Non-Ferrous Bailer & Dust Baghouse
4	Waste Slag and Dross Area
5	Ferrous Processing Area
■	Utility Vault
●	Power Pole



NOT TO SCALE  
BOUNDARIES APPROXIMATE

Clayton Environmental Consultants, Inc.  
**Site Plan**  
**Custom Alloy Scrap Sales**  
**2730 Peralta Street, Oakland, CA**  
**Clayton Project No. 26795.00**

FIGURE  
**2**



Explanation	
	Monitoring Well
	Auger Hole/Test Pit
	Interceptor Trench
	Utility Vault
	Power Pole



NOT TO SCALE  
BOUNDARIES APPROXIMATE

Clayton Environmental Consultants, Inc.

**Sample Location Map**  
**Custom Alloy Scrap Sales**  
 2730 Peralta Street, Oakland, CA  
 Clayton Project No. 26795.00

FIGURE  
3