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December 21, 1999

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WORKPLAN  
for a  
SOIL AND GROUNDWATER ASSESSMENT  
at  
EASY Mercedes  
1075 2<sup>nd</sup> Street  
Albany, CA 94710

Submitted by:  
AQUA SCIENCE ENGINEERS, INC.  
208 West El Pintado  
Danville, CA 94526  
(925) 820-9391

## **INTRODUCTION**

This submittal outlines Aqua Science Engineers, Inc. (ASE)'s workplan for a soil and groundwater assessment at EASY Mercedes located at 1075 2<sup>nd</sup> Street in Albany, California (Figure 1). The proposed site assessment activities were initiated by Mr. William Landstra and Mr. James Breazeale, owners of EASY Mercedes, to (a) meet the requirements of the Alameda County Health Care Services Agency (ACHCSA) as outlined in their letters dated October 1, 1996, February 18, 1997 and June 12, 1998 (Appendix A), (b) address the concerns raised in the January 31, 1997 affidavit from Gale Rocks, and (c) dispose of the stockpiled soil produced during the removal of the waste oil underground storage tank (UST).

## **BACKGROUND INFORMATION**

In September 1995, one waste oil UST was removed from the site. Soil samples collected from the sidewalls contained up to 24 parts per million (ppm) total petroleum hydrocarbons as diesel (TPH-D) and 63 ppm oil and grease (O&G). No total petroleum hydrocarbons as gasoline (TPH-G) was detected in the soil samples. A water sample collected from the excavation contained 6,900 parts per billion (ppb) TPH-G, 580 ppb TPH-D, and 3,200 ppb O&G. Low concentrations of semivolatile organic compounds (SVOCs) and metals were also detected.

An affidavit dated January 31, 1997 from Gale Rocks, a former employee of EASY Mercedes, listed several locations at the site which may potentially be environmental concerns. These areas are (a) a 30-foot by 30-foot area in back where oil was purged from engines and allegedly poured onto the ground, (b) a former open top aboveground waste oil tank which allegedly overflowed, (c) a drain outside the shop where oil and antifreeze was allegedly poured, and (d) the concrete floor inside the wooden portion of the building which had floors "slick and covered with oil."

The ACHCSA issued letters dated October 1, 1996, February 18, 1997 and June 12, 1998 requesting a soil and groundwater assessment at the site.

## **PROPOSED SCOPE OF WORK (SOW)**

Based on the site history and requirements of the ACHCSA and RWQCB, ASE's proposed scope of work is to:

- 1) Prepare a workplan and health and safety plan for review and approval from the ACHCSA.
- 2) Obtain a drilling permit from the Alameda County Public Works Agency.
- 3) Drill four soil borings surrounding the former UST at the site to no deeper than 12-feet below ground surface (bgs) using a Geoprobe drill rig. Soil samples will be collected for analysis.
- 4) Install temporary pre-packed well screens in the borings described in task 3.
- 5) Analyze one soil sample collected from each boring (4 total) at a CAL-EPA certified analytical laboratory for total petroleum hydrocarbons as gasoline (TPH-G) by modified EPA Method 5030/8015, total petroleum hydrocarbons as diesel (TPH-D) and motor oil (TPH-MO) by modified EPA Method 3510/8015, benzene, toluene, ethylbenzene and total xylenes (collectively known as BTEX) by EPA Method 8020, and methyl tertiary butyl ether (MTBE) by EPA Method 8020.
- 6) Return to the site and collect groundwater samples from the borings.
- 7) Analyze one groundwater sample from each boring (4 total) at a CAL-EPA certified analytical laboratory for TPH-G by modified EPA Method 5030/8015, TPH-D and TPH-MO by modified EPA Method 3010/8015, BTEX by EPA Method 8020 and MTBE by EPA Method 8020. In addition, analyze the groundwater sample with the highest hydrocarbon concentrations for polynuclear aromatic hydrocarbons (PNAs or PAHs) by EPA Method 8310 and halogenated volatile organic compounds (HVOCs) by EPA Method 8010.
- 8) Survey the top of casing elevation of each temporary well and calculate the groundwater flow direction and gradient using depth to groundwater data.
- 9) Return to the site with a hollow stem auger drill rig and remove each casing. Each boring will be backfilled with neat cement.
- 10) Drill seven additional soil borings to no greater than 4-feet bgs at the site to address the concerns raised in the January 31, 1997

affidavit from Gale Rocks. Up to three borings will be placed in the 30-foot by 30-foot area in back where oil was purged from engines and allegedly poured onto the ground, one boring will be placed at the location of the former aboveground waste oil tank, one boring will be placed at the location of the drain outside the shop, and up to three borings will be placed in the wooden section of the building near the oil storage area and near floor cracks. Soil samples will be collected from the borings for analysis.

- 11) Analyze one soil sample from each boring described in task 10 (7 total) at a CAL-EPA certified analytical laboratory for TPH-G by modified EPA Method 5030/8015, TPH-D and TPH-MO by modified EPA Method 3510/8015, BTEX and MTBE by EPA Method 8020, and HVOCs by EPA Method 8010. In addition, the three (3) soil samples with the highest hydrocarbon concentrations will also be analyzed for PNAs by EPA Method 8310 and the LUFT 5 metals by EPA Method 6010.
- 12) Dispose of the stockpiled soil generated during the waste oil UST removal at an appropriate disposal facility.
- 13) Prepare a report presenting the methods and findings of this assessment.

Details of the soil and groundwater assessment are presented below.

#### *TASK 1 - PREPARE A WORKPLAN AND HEALTH AND SAFETY PLAN*

Based on the site history, analytical results of the soil and groundwater samples collected during the UST removal, and the requirements of the ACHCSA and RWQCB, ASE has prepared this workplan and a site-specific health and safety plan. A nearby hospital is designated in the site safety plan as the emergency medical facility of first choice. A copy of the site specific health and safety plan will be available on-site at all times.

#### *TASK 2 - OBTAIN NECESSARY PERMITS*

ASE will obtain a drilling permit from the Alameda County Public Works Agency. ASE will also notify Underground Service Alert (USA) to have underground utility lines marked in the site vicinity at least 48 hours prior to drilling.

*TASK 3 - DRILL FOUR SOIL BORINGS SURROUNDING THE FORMER WASTE OIL UST AND COLLECT SOIL SAMPLES FROM THE BORING*

ASE will drill four soil borings surrounding the former waste oil UST at the site (Figure 2). The borings will be drilled using a Geoprobe or similar type drill rig. The drilling will be directed by a qualified ASE geologist. Undisturbed soil samples will be collected continuously for subsurface hydrogeologic description and possible chemical analysis. The samples will be described by the ASE geologist according to the Unified Soil Classification System. The samples will be collected in brass or acetate tubes using a drive sampler advanced as the boring progresses. Each sample will be immediately removed from the sampler, trimmed, sealed with Teflon tape and plastic caps, secured with duct tape, and labeled with the site location, sample designation, date and time the sample was collected, and the initials of the person collecting the sample. The samples will then be placed into an ice chest containing wet ice for delivery under chain of custody to a CAL-EPA certified analytical laboratory.

Soil from the remaining tubes not sealed for analysis will be removed for hydrogeologic description and will be screened for volatile compounds with an organic vapor meter (OVM). The soil will be screened by emptying soil from one of the tubes into a plastic bag. The bag will be sealed and placed in the sun for approximately 10 minutes. After the hydrocarbons have been allowed to volatilize, the OVM will measure the vapor through a small hole punched in the bag. These OVM readings will be used as a screening tool only since these procedures are not as rigorous as those used in an analytical laboratory.

All sampling equipment will be cleaned in buckets with brushes and a TSP or Alconox solution, then rinsed twice with tap water. Rinsates will be contained on-site in 55-gallon steel drums until off-site disposal can be arranged.

*TASK 4 - INSTALL TEMPORARY WELLS IN THE BORINGS*

A temporary well will be installed in each boring. These temporary wells will be constructed with PVC casing with pre-packed well screens.

*TASK 5 - ANALYZE THE SOIL SAMPLES FROM THE BORINGS DESCRIBED IN TASK 3*

One soil sample from each boring (4 total) will be analyzed by at a CAL-EPA certified analytical laboratory for TPH-G by modified EPA Method 5030/8015, TPH-D and TPH-MO by modified EPA Method 3510/8015, BTEX by EPA Method 8020, and MTBE by EPA Method 8020. The soil sample analyzed will be chosen based on field observations such as odors, staining and OVM readings. If no field indications of contamination are present, a soil sample collected from the capillary zone will be analyzed.

*TASK 6 - COLLECT GROUNDWATER SAMPLES FROM THE BORINGS*

Groundwater samples will be collected from each of the four borings. Prior to sampling, at least four well casing volumes of groundwater will be purged from each casing. The temperature, pH and electrical conductivity of evacuated water will be monitored during the well purging, and purging will continue beyond four well casing volumes if these parameters have not stabilized. Groundwater samples will be collected from each casing using a disposable polyethylene bailer. Groundwater samples to be analyzed for volatile compounds will be decanted from the bailers into 40-ml glass volatile organic analysis (VOA) vials, preserved with hydrochloric acid, sealed without headspace and labeled with the site location, sample designation, date and time the samples were collected, and the initials of the person collecting the samples. The samples to be analyzed for non-volatile compounds will be contained in 1-liter amber glass containers. The samples will be placed into an ice chest with wet ice for transport to the analytical laboratory under chain of custody.

*TASK 7 - ANALYZE THE GROUNDWATER SAMPLES*

One groundwater sample from each boring (4 total) will be analyzed by a CAL-EPA certified analytical laboratory for TPH-G by modified EPA Method 5030/8015, TPH-D and TPH-MO by modified EPA Method 3010/8015, BTEX by EPA Method 8020 and MTBE by EPA Method 8020. In addition, the groundwater sample with the highest hydrocarbon concentration will also be analyzed for PNAs by EPA Method 8310 and HVOCs by EPA Method 8010.

***TASK 8 - SURVEY THE TOP OF CASING ELEVATIONS OF THE TEMPORARY WELLS AND DETERMINE THE GROUNDWATER FLOW DIRECTION***

ASE will survey the top of casing elevation of each temporary well relative to a site datum and determine the groundwater flow direction and gradient beneath the site using depth to groundwater data.

***TASK 9 - REMOVE THE TEMPORARY WELL CASINGS***

Following the collection of the groundwater samples, ASE will return to the site to remove the temporary well casings using a hollow-stem auger drill rig. These casings will be removed by drilling around the temporary well casings and removing the sandpack and seal materials. The remaining borings will be backfilled with neat cement to the ground surface.

***TASK 10 - DRILL SEVEN ADDITIONAL SHALLOW SOIL BORINGS AT THE SITE AND COLLECT SOIL SAMPLES FROM THE BORING***

Seven additional soil borings will be drilled to a depth of no greater than 4-foot bgs at the site to address the concerns raised in the January 31, 1997 affidavit from Gale Rocks. Up to three borings will be placed in the 30-foot by 30-foot area in back where oil was purged from engines and allegedly poured on the ground, one boring will be placed at the location of the former above ground waste oil tank, one boring will be placed at the location of the drain outside the shop, and up to three borings will be placed in the wooden section of the building near the oil storage area and near floor cracks.

The borings will be drilled using a Geoprobe or similar type drill rig in the same manner as the borings drilled in Task 3. Following the collection of soil samples from these borings, ASE will backfill these borings with neat cement.

***TASK 11 - ANALYZE THE SOIL SAMPLES DESCRIBED IN TASK 10***

One soil sample from each boring described in Task 10 (7 total) will be analyzed at a CAL-EPA certified analytical laboratory for TPH-G by modified EPA Method 5030/8015, TPH-D and TPH-MO by modified EPA Method 3510/8015, BTEX and MTBE by EPA Method 8020, and HVOCs by EPA Method 8010. In addition, the three soil samples with the highest hydrocarbon concentrations will also be analyzed for PNAs by EPA Method 8310 and the LUFT 5 metals by EPA Method 6010.

**TASK 12 - DISPOSE OF THE SOIL STOCKPILED FROM THE WASTE OIL UST  
REMOVAL**

ASE will arrange for the disposal of the soil stockpile at the site that was generated during the removal of the waste oil UST. ASE estimates that there are between 15 and 22 tons of soil currently stockpiled at the site. This soil will be profiled into, transported to and disposed of at an appropriate disposal facility.

**TASK 13 - PREPARE A SUBSURFACE ASSESSMENT REPORT**

ASE will prepare a report outlining the methods and findings of this assessment. The report will be submitted under the seal of state registered civil engineer or geologist. This report will include a summary of all work completed during this assessment including tabulated soil and groundwater analytical results, conclusions and recommendations. Copies of the analytical report and chain of custody will be included as appendices.

**SCHEDULE**

ASE plans to begin field activities at this site immediately upon approval of this workplan by the ACHCSA. Drilling is tentatively scheduled for the week of December 27, 1999.



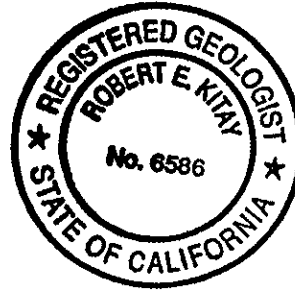
Should you have any questions or comments, please call us at (925) 820-9391.

Respectfully submitted,

AQUA SCIENCE ENGINEERS, INC.



Robert E. Kitay, R.G., R.E.A.  
Senior Geologist



cc: Mr. William Landstra, EASY Automobile Savage Yard, 1075 2<sup>nd</sup> Street,  
Albany, CA 94710

Mr. Sean Absher, Miller, Starr and Regalia, 1331 N. California Blvd.,  
5<sup>th</sup> Floor, Walnut Creek, CA 94596

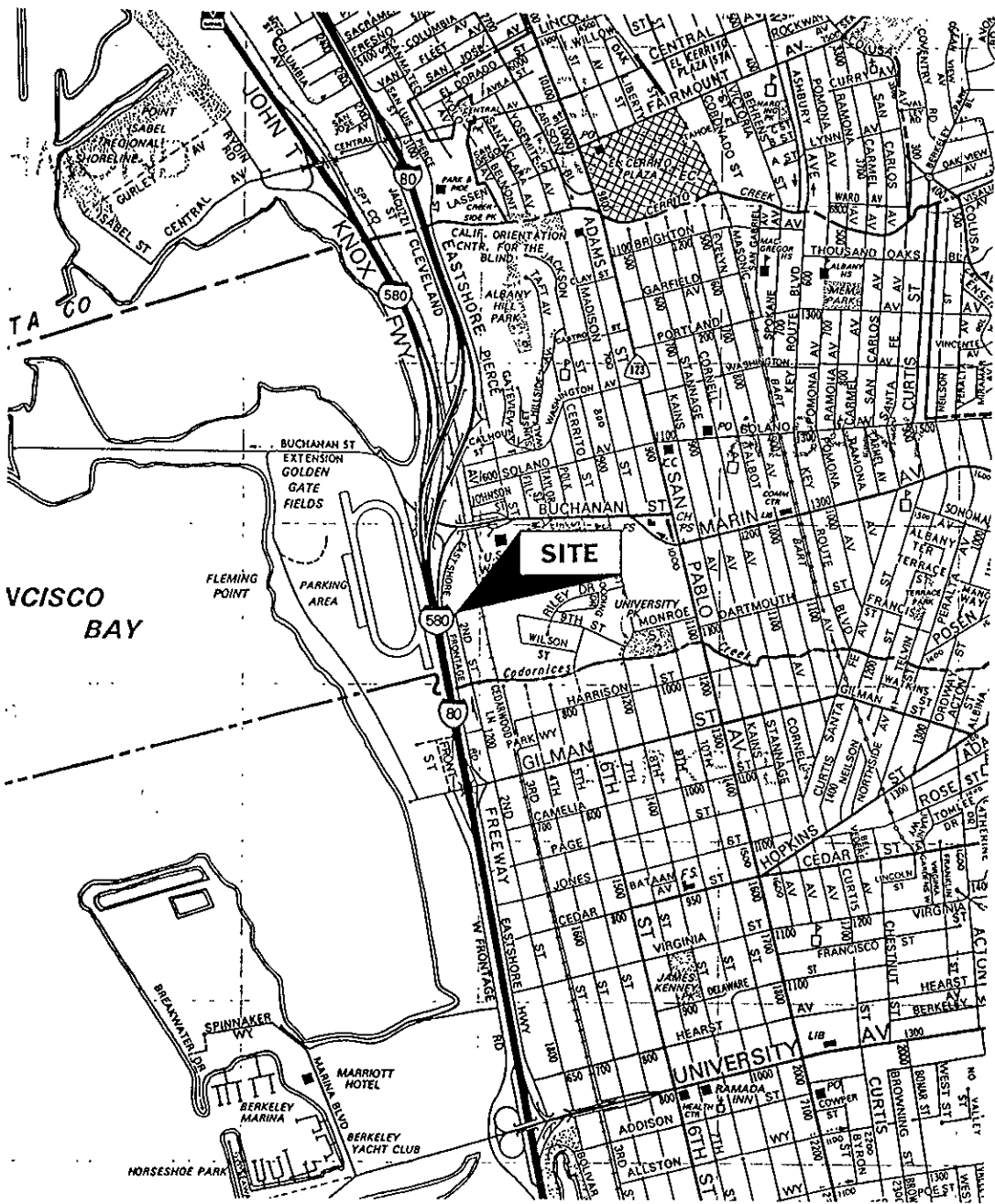
Ms. Eva Chu, Alameda County Health Care Services Agency, 1131  
Harbor Bay Parkway, Suite 250, Alameda, CA 94502

Mr. Chuck Headlee, California Regional Water Quality Control Board,  
San Francisco Bay Region, 1515 Clay Street, Suite 1400, Oakland, CA  
94612

# FIGURES



NORTH

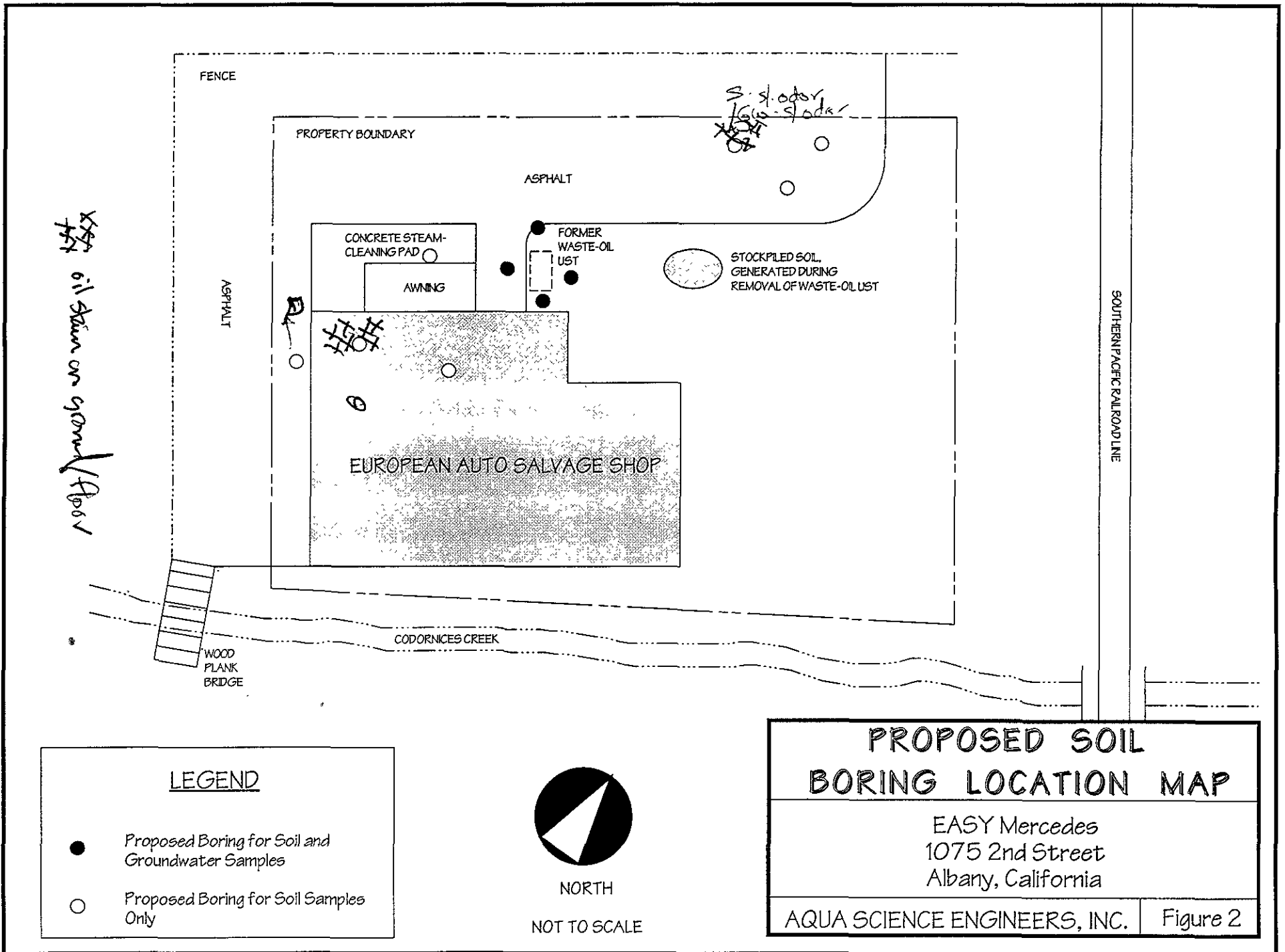


### SITE LOCATION MAP

EASY MERCEDES  
1075 2nd STREET  
ALBANY, CALIFORNIA

AQUA SCIENCE ENGINEERS, INC.

Figure 1



# **APPENDIX A**

ACHCSA Letters

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

October 1, 1996

Mr. William Landstra  
European Auto Salvage  
1075 2nd Street  
Albany, CA 94702

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

STID 5446

Re: 1075 2nd Street, Albany, California

Dear Mr. Landstra,

This office has recently named you, operator of the current on-site business, and Brian B. Horsefall, former owner of Goodwin of California, as Responsible Parties, in addition to the already named Southern Pacific Trans. Co. (Southern Pacific), for the required investigations related to the former underground storage tank at the above site.

You and Mr. Horsefall were named as Responsible Parties (RPs) in accordance with Article 11, Chapter 16, Title 23 California Code of Regulations (CCR); 42USC Section 6991(3)(B); and the fact that both you and Mr. Horsefall appear to have owned the referenced underground storage tank, based on the lease contracts which specify that they owned all the improvements on the site. Per Article 11, Chapter 16, Title 23 CCR, an RP is defined as the following: " 1) Any person who owns or operates an underground storage tank used for the storage of any hazardous substance; 2) In the case of any underground storage tank no longer in use, any person who owned or operated the underground storage tank immediately before the discontinuance of its use; 3) Any owner of property where an unauthorized release of a hazardous substance from an underground storage tank has occurred; and 4) Any person who had or has control over an underground storage tank at the time of or following an unauthorized release of a hazardous substance." Additionally, per 42USC Section 6991, the person who owned a tank which was not used after November 8, 1984, immediately before the discontinuance of its use, may be named an RP, even though substantial evidence does not exist to show that the leak occurred before discontinuance of use.

This office sent Southern Pacific a letter on December 11, 1995 requesting that a workplan, addressing investigations at the above site, be submitted by the end of January 1996. To this date, this office has not received the requested workplan. Based on the listing of two new RPs for the site, this office is readdressing the contents of the December 11, 1995 letter in this letter, and issuing a new due date of November 29, 1996, for the submittal of the workplan.

Mr. William Landstra  
Re: 1075 2nd St.  
October 1, 1996  
Page 2 of 3

On September 15, 1995, one 300-gallon waste oil underground storage tank (UST) was removed from the above site. Groundwater was encountered in the tank pit at approximately 4.5-feet below ground surface. Two sidewall samples were collected from the north and south ends of the pit at the soil/water interface, and one "grab" groundwater sample was collected from the pit. Petroleum odor and an iridescent sheen were noted within the tank pit in the bay mud and in the immediate area surrounding the filler pipe.

These samples were analyzed for Total Petroleum Hydrocarbons as gasoline (TPHg), TPH as diesel (TPHd), Oil & Grease, benzene, toluene, ethylbenzene, and xylenes (BTEX), chlorinated hydrocarbons (Method 8010), Semivolatile Organic compounds (SVOCs), and heavy metals. Low levels of TPHd, Oil & Grease, SVOCs, and metals were identified in the soil samples, and moderate to elevated levels of TPHg, TPHd, and Oil & Grease were identified in the "grab" groundwater sample.

Guidelines established by the California Regional Water Quality Control Board (RWQCB) and the UST regulations given in Title 23 CCR, require that soil and groundwater investigations be conducted when there is evidence to indicate that a release from an UST may have impacted groundwater. Although the extent of soil contamination resulting from the UST appears to have been adequately delineated, further investigations need to be conducted to determine the extent and severity of the observed groundwater contamination. In addition to the regulations provided in Title 23 CCR, the RWQCB has recently published interim guidelines for petroleum contaminated sites, which is included in the Attachment to this letter.

In the November 29, 1995 Underground Storage Tank Removal Report, prepared by Industrial Compliance (IC), IC proposes to further characterize the groundwater contamination by emplacing four hydropunches at the site and collecting "grab" groundwater samples from each location. A hydropunch investigation would be acceptable, however, it is very likely that a permanent downgradient monitoring well will need to be installed, following the hydropunch work, to monitor the migration of the plume. The "grab" groundwater samples should be analyzed for TPHg, TPHd, Oil & Grease, and BTEX. In the last water sample analysis, the identified petroleum hydrocarbons in the gasoline range did not match the standard chromatograph pattern. Therefore, this office is requesting that, if possible, attempts be made to characterize the constituents identified in the TPHg range (e.g., weathered gas, etc) during this next phase of work.

Mr. William Landstra  
Re: 1075 2nd St.  
October 1, 1996  
Page 3 of 3


Additionally, if the hydropunch investigation is implemented, this office is requesting that these locations be surveyed to a temporary on-site datum, that water level measurements be collected from these locations, and that a groundwater gradient direction be determined for the site to confirm whether the groundwater is flowing to the west.

This Department will oversee the assessment and remediation of your site. Our oversight will include the review of and comment on work proposals and technical guidance on appropriate investigative approaches and monitoring schedules. The issuance of well drilling permits, however, will be through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. The RWQCB may choose to take over as lead agency if it is determined, following the completion of the initial assessment, that there has been a substantial impact to groundwater.

In order to properly conduct a site investigation, you are required to obtain the professional services of a reputable environmental consultant. All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,



Juliet Shin  
Senior Hazardous Materials Specialist

ATTACHMENT

cc: Brian B. Horsefall  
937 Quiet Place Court  
Walnut Creek, CA 94598

Randall Smith  
Southern Pacific Trans. Co  
One Market Plaza  
San Francisco, CA 94105

Acting Chief



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



FEB 18 1997

GARDNER &amp; WYNNIE

ENVIRONMENTAL  
ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION (LOP)  
1131 Harbor Bay Parkway Suite 250  
Alameda, CA 94502-6577  
(510) 567-5700  
FAX (510) 337-9335

February 18, 1997

Mr. William Landstra  
European Auto Salvage  
1075 2nd Street  
Albany, CA 94702

STID 5446

Re: Investigations related to the former waste oil tank at 1075 2nd Street, Albany, CA

Dear Mr. Landstra,

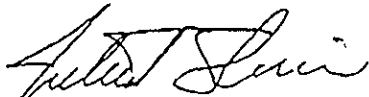
On October 1, 1996, the Alameda County Environmental Protection Division named you as one of the Responsible Parties (RPs) for investigations related to the former waste oil underground storage tank (UST) at the above site (please refer to attached copy of letter). At the time, the County listed you as an RP because it appeared that, per the lease agreement between you and Southern Pacific Transportation Company (Southern Pacific), the property owner, you owned the UST. Recently, this office received an affidavit from a former employee of yours, who provided additional information to indicate that you contributed to the observed contamination at the site and, therefore, qualify as an RP. According to the affidavit, you and your employees utilized the waste oil UST between 1987 and 1991, knowing that the waste oil UST was leaking. Additionally, the affidavit reports that an above ground storage tank with an open top, which was not designed for oil storage, was carelessly used with the oily contents of the tank regularly overflowing onto the ground. Furthermore, oil and antifreeze were discharged into the on-site drain which leads to the adjacent creek and into the Bay. Lastly, per the affidavit, there was a large open area where engines were purged of waste oil directly onto the ground.

Consequently, you have been named by the County as a Responsible Party for investigating, and potentially remediating, the observed contamination at the site. Southern Pacific has also been listed as an RP because they own the property. Per the copy of the February 14, 1997 letter to Mr. Horsfall that you received, Mr. Horsfall is no longer listed as an RP for the site. Per the October 1, 1996 letter, you and Southern Pacific were required to submit a workplan, addressing further investigations at the site, to this office by November 29, 1996. To this date, this office has not received any communication or correspondence from you responding to the County's request. This office is extending to you another due date for the submittal of a workplan addressing the issues outlined in the attached October 1, 1996 letter. This workplan is due to this office within 60 days of this letter (i.e., by April 15, 1997), and should also address the additional issues outlined above.

This office recommends that you contact Southern Pacific to coordinate the submittal of the workplan. If you have any questions or comments, please contact me at (510) 567-6763.

Mr. William Landstra  
Re: 1075 2nd St.  
February 18, 1997  
Page 2 of 2

Sincerely,



Juliet Shin  
Senior Hazardous Materials Specialist

ATTACHMENT

cc: Mr. Randall Smith  
Southern Pacific Trans. Co.  
One Market Plaza  
San Francisco, CA 94105

Joan Krajewski  
Gardere & Wynne, L.L.P.  
1601 Elm Street, Ste 3000  
Dallas, Texas 75201-4761

Acting Chief

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



5/1/84  
*(Handwritten signature)*

StID 5446

June 12, 1998

Mr. William Landstra  
European Auto Salvage  
1075 2<sup>nd</sup> Street  
Albany, CA 94710

Mr. Randall Smith, Environmental Affairs  
Southern Pacific Trans Co  
One Market Plaza  
San Francisco, CA 94105

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

**SECOND NOTICE OF VIOLATION**

Dear Messrs. Landstra and Smith:

On February 18, 1997, the Alameda County Department of Environmental Health, Hazardous Materials Division, sent you a letter requesting a workplan for further subsurface investigations to determine the extent of groundwater contamination onsite due to the unauthorized release of fuel products at 1075 2<sup>nd</sup> Street, Albany, CA. A workplan was due to this office by November 29, 1996 and subsequently extended to April 15, 1997. As of the date of this letter, however, we have not received any communication from you on this matter. Therefore, this letter constitutes a Second Notice that you are in violation of specific laws and that the technical report is due.

According to Section 25298 of the California Health and Safety Code, underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge. Therefore, you, as the responsible party are in violation of this section of the Code, for which Section 25299 specifies civil penalties of up to \$5,000, for each day of violation, upon conviction. Also, failure to furnish technical reports regarding documented or potential groundwater contamination violates Section 13267(b) of the California Water Code. The Regional Water Quality Control Board (RWQCB) can impose civil penalties of up to \$1,000 per day that such a violation continues.

At this time, you are required to submit the technical reports for the site to this office **within 30 days** from the date of this letter. Modification of required tasks or extensions of stated deadlines must be confirmed in writing by either this agency or the RWQCB.

If you have any questions, I can be reached at (510) 567-6762.

eva chu  
Hazardous Materials Specialist