

RO2478

RO2746

Wickham, Jerry, Env. Health

To: Goloubow, Ron
Cc: Chandler, Tom; jkrause@westsidebmc.com; marcellah@gvakm.com
Subject: RE: AAA Equipment Company at 745 50th Street and the Property Located at 768 46th Avenue, both in Oakland, California

Based upon your request, the schedule for report submittal for cases RO2478 and RO2746 is extended to May 30, 2008.

Regards,
Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 fax
jerry.wickham@acgov.org

From: Goloubow, Ron [mailto:Ron.Goloubow@lfr.com]
Sent: Thursday, March 20, 2008 10:11 AM
To: Wickham, Jerry, Env. Health
Cc: Chandler, Tom; jkrause@westsidebmc.com; marcellah@gvakm.com
Subject: AAA Equipment Company at 745 50th Street and the Property Located at 768 46th Avenue, both in Oakland, California

Jerry – Per my voice mail, LFR is scheduled to collect the soil & grab groundwater samples at the subject sites during the week of March 31, 2008. We anticipate that the analytical results of the soil & groundwater samples will be available by April 11, 2008. The letter from the Alameda County Environmental Health Services (ACEHS) to Richard Neu of the Edenwood Corporation dated, December 3, 2007 requested that the soil and groundwater investigation at 768 46th Avenue, be completed by April 29, 2008 and the letter from ACEHS to Jack Krause of Alta Properties and Richard Neu of the Edenwood Corporation dated November 30, 2007 requested that the soil and groundwater investigation at 745 50th Street be completed by April 18, 2008. Now that the field work for the projects is scheduled to take place during the week of March 31, 2008 we are requesting that deadline for each report be extended to Monday May 30, 2008.

Please let me know if the ACEHS can approve this request for an extension.

Thanks Ron.

Ron Goloubow
Senior Associate Geologist
LFR Inc.
1900 Powell Street, 12th Floor
Emeryville, CA 94608-1827
510-596-9550 Direct Dial
510-501-1789 Cell
510-652-4500 Main Number
510-652-4906 Facsimile
ron.goloubow@lfr.com
Visit us at www.lfr.com

3/20/2008

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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December 3, 2007

Mr. Richard Neu
Edenwood Corp.
47 Parsippany Road
Whippany, NJ 07981

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

Subject: SLIC Case RO0002478 and Geotracker Global ID SLT2O150156, Learner Investment Company, 768 46th Avenue, Oakland, CA 94601

Dear Mr. Neu:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case files for the above referenced site including the recently submitted document entitled, "Additional Site Assessment Workplan, Learner Investment Company Property, 786 46th Avenue, Oakland, California, SLIC Case RO0002478; Geotracker Global ID SLT2O150156," dated November 8, 2007. The above referenced work plan, which was prepared by LFR Environmental Management & Consulting Engineering, proposes soil and groundwater sampling at several locations throughout your site. We have also received a work plan entitled, "Workplan for Assessment of Dichlorobenzene in Soil and Groundwater, Former AAA Equipment Company Property, 745 50th Street, Oakland, California (SLIC Case No. RO0002746 and Geotracker Global ID SL0600186350) and Learner Investment Company Property, 786 46th Avenue, Oakland, California SLIC Case RO0002478 and Geotracker Global ID SLT2O150156, Learner Investment Company, 768 46th Avenue, Oakland, CA 94601," dated October 30, 2007, which proposes work at both the Learner Investment Company site and adjacent AAA Equipment site. Technical comments in this correspondence apply only to the November 8, 2007 work plan. Technical comments on the October 30, 2007 work plan was provided in separate ACEH correspondence dated November 30, 2007.

The proposed scope of work in the November 8, 2007 work plan is generally acceptable and may be implemented provided that the technical comments below are addressed during the proposed field investigation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. **Additional Proposed Boring Locations.** We request that you add three additional soil boring locations as shown on the attached Revised Figure 4. Based on the previous results in the area of the former bailer, pumphouse, and tank we request two additional soil borings to help evaluate the extent of contamination in this area. We request that one soil boring be advanced to evaluate soil and groundwater quality in the area of a former UST in the western portion of the property.

2. **Screening/Regulatory Criteria.** We do not concur with the proposed regulatory criteria for the site. It is generally not acceptable to eliminate exposure routes by assuming that future development will result in capping of the site. For screening purposes only, you may refer to the default screening levels listed in Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater (February 2005), San Francisco Bay Regional Water Quality Control Board <http://www.waterboards.ca.gov/sanfranciscobay/esl.htm>.
3. **Proposed Soil Sampling.** We request that soils from the proposed direct push soil borings be logged and screened continuously in the field as the boring is advanced. Field screening is to be conducted by a qualified field geologist using visual observations, odor, and measurements using a field photoionization detector (PID) fitted with an appropriate lamp that is calibrated for the chemicals of concern. Soil samples are to be extracted from the continuous cores at frequent intervals and placed in sealed jars or plastic bags for measurement using the PID of VOC concentrations in the headspace. The proposal to collect soil samples at depths of 1, 2, and 4 feet bgs is acceptable. However, we do not concur with the analysis of only the soil sample from 1-foot bgs if no obvious staining or metal scraps are observed in lower intervals. At a minimum, we request that soil samples from 1 and 4 feet bgs are submitted for laboratory analysis from each boring. The soil sample collected at 2 feet bgs may be held pending analytical results of the 1-foot sample.
4. **Proposed Boring Depths.** For the proposed borings where only soil samples will be collected, the proposal to extend borings to a depth of four feet is acceptable. For soil borings in which groundwater samples will be collected, the borings are to be advanced approximately five feet below the depth at which groundwater is first encountered in order to collect grab groundwater samples.
5. **Soil Sampling Procedures.** Soil samples for analyses other than VOCs may be collected in clean liners that are sealed at each end with plastic caps and silicone tape. However, it is important to limit the volatilization of VOCs from soil cores and samples that will be analyzed in the laboratory for VOCs. We request that soil samples for VOCs be collected using soil sampling syringes as soon as practicable after the soil core is available. Subsamples collected using the syringes are to be extruded in the field into new volatile organic analysis vials for transport to the laboratory.
6. **Proposed Laboratory Analyses for Soil Samples.** Polychlorinated biphenyls (PCBs) were detected at elevated concentrations in two composite soil samples from two soil piles on site. It is not clear where the source of the PCBs is located. Therefore, we request that you include PCB analysis for all of the proposed soil samples. In addition, we request that you include analysis for polynuclear aromatic hydrocarbons (PAHs) for each of the soil samples. In summary, we request that you analyze soil samples from the proposed borings for VOCs using EPA Method 8260B, TPH as diesel and TPH as motor oil using EPA Method 8015M with silica gel cleanup, PAHs using EPA Method 8270 with selective ion monitoring, CAM 17 metals using EPA Method 6010, and PCBs using EPA Method 8082. Please present results in the Site Investigation Report requested below.
7. **Groundwater Sampling Methods and Analysis for Metals.** The proposed grab groundwater sampling methods are generally acceptable. However, we note that the grab groundwater samples collected for metals analysis will be filtered at the laboratory prior to analysis. Grab groundwater samples are generally not of sufficient quality to provide

representative results for dissolved metals due to elevated turbidity. Filtering of the samples may partially offset the effects of elevated turbidity but the results are not necessarily representative of dissolved concentrations in groundwater. You may analyze the filtered grab groundwater samples for metals; however, the metals data may only be considered on a relative basis to identify possible metals sources and should not be considered representative results for comparison to human health screening criteria. Installation of groundwater monitoring wells during a future phase of investigation will be necessary to obtain groundwater samples of sufficient quality for dissolved metals analysis.

8. **Proposed Laboratory Analyses for Groundwater Samples.** The proposed analysis of groundwater samples for TPH as diesel and TPH as motor oil using EPA Method 8015M with silica gel cleanup and VOCs using EPA Method 8260B is acceptable. Please see technical comment 7 regarding analysis of grab groundwater samples for metals.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Jerry Wickham), according to the following schedule:

- **April 29, 2008** – Site Investigation Report

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

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

Mr. Richard Neu
RO0002478
December 3, 2007
Page 4

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.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

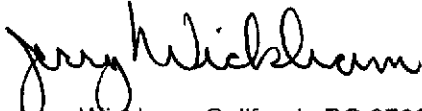
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For 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 call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Hazardous Materials Specialist

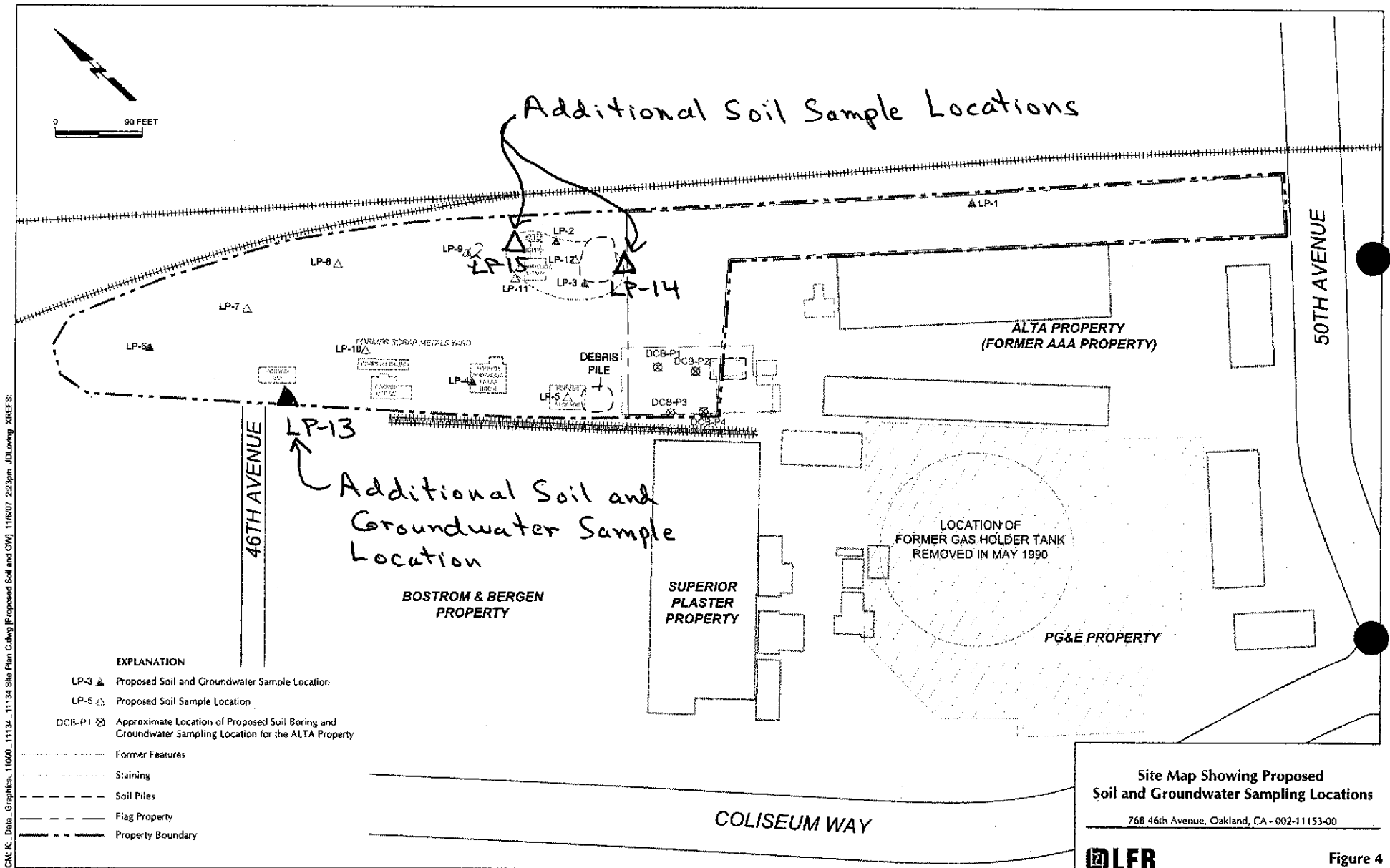
Attachment: Revised Figure 4

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Marcella Harrison, GVA Kidder Mathews, 505 Sansome Street, Suite 300, San Francisco, CA 94111

Tom Chandler, LFR, 3150 Bristol Street, Suite 250, Costa Mesa, CA 92626-7324

Donna Drogos, ACEH
Jerry Wickham, ACEH
File RO2478



Revised Figure 4

C:\K:\Data\Graphics\11000_11134_Site Plan C.dwg [Proposed Soil and GW] 11/6/07 2:23pm JDL\wing AREES:

Figure 4

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

November 30, 2007

Mr. Jack Krause
Alta Properties, LLC
P.O. Box 2399
Oakland, CA 94614

Mr. Richard Neu
Edenwood Corp.
47 Parsippany Road
Whippany, NJ 07981

Subject: SLIC Case No. RO0002746 and Geotracker Global ID SL0600186350, AAA Equipment, 745 50th Avenue, Oakland, CA 94601 and SLIC Case RO0002478 and Geotracker Global ID SLT2O150156, Learner Investment Company, 768 46th Avenue, Oakland, CA 94601

Dear Mr. Krause and Mr. Neu:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case files for the above referenced sites including the recently submitted document entitled, "Workplan for Assessment of Dichlorobenzene in Soil and Groundwater, Former AAA Equipment Company Property, 745 50th Street, Oakland, California (SLIC Case No. RO0002746 and Geotracker Global ID SL0600186350) and Learner Investment Company Property, 786 46th Avenue, Oakland, California SLIC Case RO0002478 and Geotracker Global ID SLT2O150156, Learner Investment Company, 768 46th Avenue, Oakland, CA 94601," dated October 30, 2007. The above referenced work plan, which was prepared by LFR Environmental Management & Consulting Engineering proposes work at both the AAA Equipment and Learner Investment Company sites. We have also received a work plan entitled, "Additional Site Assessment Workplan, Learner Investment Company Property, 768 46th Avenue, Oakland, California," dated November 8, 2007 that proposes additional site investigation activities exclusively at the Learner Investment Company property. Technical comments in this correspondence apply only to the October 30, 2007 work plan; separate ACEH correspondence will address the November 8, 2007 work plan.

Petroleum hydrocarbons and chlorinated solvents, including 1,3-dichlorobenzene and 1,4-dichlorobenzene, have been detected in soil and groundwater samples collected on four adjacent properties in the area of your site. It appears that the chlorinated solvents are from a common source of historic releases that occurred on each of the four properties (PG&E, Learner Investment Company, AAA Equipment, and Superior Plaster Casting), resulting in a commingled plume. Therefore, ACEH considers all four parties responsible for the release. As presented in directive letters and discussed during a meeting with each of the four responsible parties held on October 10, 2007, ACEH requested that responsible parties for each of four adjacent properties work individually or cooperatively to evaluate the source and extent of the groundwater impacts. We thank Alta Properties LLC and Mr. Richard Neu for their cooperation in preparing a Work Plan to accomplish this goal. We note that have also submitted a work plan for site investigation on the adjacent PG&E property. To date a work plan has not been submitted for the Superior

Plaster Casting site and we have again requested that a work plan be submitted for this fourth property.

The proposed scope of work in the October 30, 2007 work plan is generally acceptable and may be implemented provided that the technical comments below are addressed during the proposed field investigation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

- 1. Proposed Soil Sampling.** We request that soils from the proposed direct push soil borings be logged and screened continuously in the field as the boring is advanced. Field screening is to be conducted by a qualified field geologist using visual observations, odor, and measurements using a field photoionization detector (PID) fitted with an appropriate lamp and calibrated for the chemicals of concern. Soil samples are to be extracted from the continuous cores at frequent intervals and placed in sealed jars or plastic bags for measurement and recording of VOC concentrations in the headspace using the PID. Soil samples are to be collected for laboratory analysis from any zones where visible staining, odor, or elevated PID readings are observed. If visible staining, odor, or elevated PID readings are observed, a sufficient number of soil samples must be collected to characterize the vertical interval over which the contamination occurs. If no visible staining, odor, or elevated PID readings are observed, the collection of a soil sample at the proposed fixed interval of 4 feet bgs from each boring is acceptable. Please present boring logs, screening results, and analytical data for soil samples in the Site Investigation Report requested below.
- 2. Soil Sampling Procedures.** Soil samples for analyses other than VOCs may be collected in clean liners that are sealed at each end with plastic caps and silicone tape. However, it is important to limit the volatilization of VOCs from soil cores and samples that will be analyzed in the laboratory for VOCs. We request that soil samples for VOCs be collected using soil sampling syringes as soon as practicable after the soil core is available. Subsamples collected using the syringes are to be extruded in the field into new volatile organic analysis vials for transport to the laboratory.
- 3. Proposed Laboratory Analyses for Soil Samples.** We request that you analyze soil samples from proposed borings DCB-P1 through DCB-P4 for VOCs using EPA Method 8260B, TPH as diesel and TPH as motor oil using EPA Method 8015M with silica gel cleanup, polynuclear aromatic hydrocarbons (PAHs) using EPA Method 8270 selective ion monitoring, and CAM 17 metals using EPA Method 6010. We request that you analyze soil samples from proposed borings DCB-P5 and DCB-P6 for VOCs using EPA Method 8260B and TPH as diesel and TPH as motor oil using EPA Method 8015M with silica gel cleanup.
- 4. Groundwater Sampling Methods and Analysis for Metals.** The proposed grab groundwater sampling methods are generally acceptable. However, we note that the four grab groundwater samples collected for metals analysis from borings DCB-P1 through DCB-

P4 will be filtered at the laboratory prior to analysis. Grab groundwater samples are generally not of sufficient quality to provide representative results for dissolved metals due to elevated turbidity. Filtering of the samples may partially offset the effects of elevated turbidity but the results are not necessarily representative of dissolved concentrations in groundwater. You may analyze the filtered grab groundwater samples for metals; however, the metals data may only be considered on a relative basis to identify possible metals sources and should not be considered representative results for comparison to human health screening criteria. Installation of groundwater monitoring wells during a future phase of investigation will be necessary to obtain groundwater samples of sufficient quality for dissolved metals analysis, if warranted.

5. **Proposed Laboratory Analyses for Groundwater Samples.** In addition to the proposed analyses, we request that you analyze all groundwater samples for TPH as diesel and TPH as motor oil using EPA Method 8015M with silica gel cleanup.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Jerry Wickham), according to the following schedule:

- **April 18, 2008** – Site Investigation Report

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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Mr. Jack Krause
Mr. Richard Neu
RO0002746 and RO0002478
November 30, 2007
Page 4

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.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

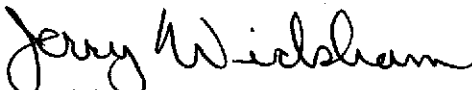
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For 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 call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Mr. Jack Krause
Mr. Richard Neu
RO0002746 and RO0002478
November 30, 2007
Page 5

cc: Marcella Harrison, GVA Kidder Mathews, 505 Sansome Street, Suite 300, San Francisco,
CA 94111

Robert Saur, PG&E, 3400 Crow Canyon Road, San Ramon, CA 94583

Robert Nichols, P.O. Box 6716, Oakland, CA 94603

John Miller, 250 Cambridge Avenue, Palo Alto, CA 94306

Tom Chandler, LFR, 3150 Bristol Street, Suite 250, Costa Mesa, CA 92626-7324

Robert Schultz, Geomatrix, 2101 Webster Street #12, Oakland, CA 94612

Donna Drogos, ACEH
Jerry Wickham, ACEH
File RO2746
File RO2478

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F
RO 2478

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

November 30, 2007

Mr. Robert Saur
PG&E
3400 Crow Canyon Road
San Ramon, CA 94583

Subject: SLIC Case No. RO0000099 and Geotracker Global ID T0600100258, PG&E, 4930 Coliseum Way, Oakland, CA 94601

Dear Mr. Saur:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site including the recently submitted document entitled, "Additional Investigation Work Plan, PG&E Oakland General Construction Yard, 4930 Coliseum Way, Oakland, California," dated November 16, 2007. The Work Plan, which was prepared by Geomatrix, proposes advancing soil borings at nine locations to collect soil and groundwater samples.

Petroleum hydrocarbons and chlorinated solvents, including 1,3-dichlorobenzene and 1,4-dichlorobenzene, have been detected in soil and groundwater samples collected on four adjacent properties in the area of your site. It appears that the chlorinated solvents are from a common source of historic releases that occurred on each of the four properties (PG&E, Learner Investment Company, AAA Equipment, and Superior Plaster Casting), resulting in a commingled plume. Therefore, ACEH considers all four parties responsible for the release. As presented in directive letters and discussed during a meeting with each of the four responsible parties held on October 10, 2007, ACEH requested that responsible parties for each of four adjacent properties work individually or cooperatively to evaluate the source and extent of the groundwater impacts. We thank PG&E for their cooperation in preparing a Work Plan to accomplish this goal. We note that Alta Properties LLC and Mr. Richard Neu have also submitted a work plan for site investigation on the adjacent AAA Equipment and Learner Investment Company properties. To date a work plan has not been submitted for the Superior Plaster Casting site and we have again requested that a work plan be submitted for this fourth property.

The proposed scope of work in the November 16 work plan is generally acceptable and may be implemented provided that the technical comments below are addressed during the proposed field investigation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. **Proposed Soil and Groundwater Sampling.** The proposed soil and groundwater sampling locations and methods are generally acceptable. However, we request that the proposed soil samples within the former excavation area (borings SB-26 and SB-28) be collected 6 inches below the fill and native soil contact where the contact is obvious rather than at the proposed fixed interval. If the fill and native soil contact is not obvious, the soil samples are to be collected at 9.5 feet bgs in SB-26 and 8 feet bgs in boring SB-28.
2. **Depth of Deeper Soil Borings.** The proposed depth of deeper soil borings SB-29 and SB-30 was not specified in section 3.2.2 of the Work Plan. We request that borings SB-29 and SB-30 be extended to a minimum depth of 35 feet bgs. Determining the depth intervals for collection of depth-discrete groundwater samples in the field based on encountered soil stratigraphy is acceptable.
3. **Proposed Laboratory Analyses for Soil Samples.** We request additional analyses for several soil samples as shown on the attached Revised Table 1. We request that the four soil samples that will be analyzed for polynuclear aromatic hydrocarbons (PAHs) also be analyzed for polychlorinated biphenyls (PCBs) using EPA Method 8082 and CAM 17 metals using EPA Method 6010. We also request analysis for VOCs and TPH as diesel and motor oil for several additional samples as shown on attached Revised Table 1. Please present these results in the Site Investigation Report requested below.
4. **Proposed Laboratory Analyses for Groundwater Samples.** The proposed laboratory analyses for groundwater samples are acceptable.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Jerry Wickham), according to the following schedule:

- **April 18, 2008** – Site Investigation Report

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater

Mr. Robert Saur
RO0000099
November 30, 2007
Page 3

cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

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.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS


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 call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Hazardous Materials Specialist

Attachment: Revised Table 1

Mr. Robert Saur
RO0000099
November 30, 2007
Page 4

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Marcella Harrison, GVA Kidder Mathews, 505 Sansome Street, Suite 300, San Francisco, CA 94111

Jack Krause, Alta Properties, LLC, P.O. Box 2399, Oakland, CA 94614

Richard Neu, Edenwood Corp., 47 Parsippany Road Whippany, NJ 07981

Robert Nichols, P.O. Box 6716, Oakland, CA 94603

John Miller, 250 Cambridge Avenue, Palo Alto, CA 94306

Tom Chandler, LFR, 3150 Bristol Street, Suite 250, Costa Mesa, CA 92626-7324

Robert Schultz, Geomatrix, 2101 Webster Street #12, Oakland, CA 94612

Donna Drogos, ACEH
Jerry Wickham, ACEH
File RO2746
File RO2478

Table 1. Sampling and Analysis Plan

Sampling Location	Location	Sample Depths to be Analyzed (feet bgs)	VOCs	TPHg	TPHd with Silica Gel Cleanup	TPHmo with Silica Gel Cleanup	PAHs
SB-23	Former diesel UST, downgradient of former Superior Plaster	Soil: 3 ¹	X				
		Soil: 4 ²			X	X	
SB-24	Downgradient of former Superior Plaster	Soil: 3	X		X	X	
		Groundwater: first ³	X		X	X	
SB-25	Downgradient of former Superior Plaster and Learner, Adjacent to former Excavation	Soil: 3 ¹	X				
		Soil: 4 ²			X	X	X
		Groundwater: first ³	X	X	X	X	
SB-26	Downgradient of former AAA, Superior Plaster, and Learner	Soil: X 9.5	X		X	X	X
		Groundwater: first ³	X	X	X	X	
SB-27	Downgradient of former AAA	Groundwater: first ³	X	X	X	X	
SB-28	Downgradient of former AAA	Soil: X 8	X		X	X	X
		Groundwater: first ³	X	X	X	X	
SB-29	Downgradient of well OW-7, adjacent to former excavation	Soil: 3 ¹	X	X			
		Soil: 4 ²			X	X	X
		Groundwater: first and deeper ³	X	X	X	X	
SB-30	Downgradient of well OW-7	Soil: 3 ¹	X				
		Groundwater: first and deeper ³	X	X	X	X	
SB-31	Downgradient of former AAA, Superior Plaster, and Learner	Groundwater: first ³	X	X	X	X	

Metals and PCBs

X

X

X

X

Notes:

- ¹ Sample to be collected in vadose-zone soil at least 1 foot above first-encountered groundwater.
- ² Sample to be collected from immediately above first-encountered groundwater.
- ³ Depth to groundwater is estimated at 5 feet bgs. Sampling interval will be from water table to 5 feet below.
- X Sample to be analyzed for listed parameters.

3.2.6 Quality Assurance and Quality Control Methodology

Field quality assurance/quality control (QA/QC) samples for chemical analysis will include the collection of one groundwater blind field duplicate and one trip blank per sample cooler. QA/QC procedures will include adherence to protocols for field sampling and decontamination procedures, as well as collection and laboratory analysis of controlled standards, matrix spike

R02478

Wickham, Jerry, Env. Health

To: Chandler, Tom
Subject: RE: SLIC Case R00002478

Based upon your request, the schedule for submittal of a Work Plan for the Learner Property at 768 46th Avenue in Oakland is extended to November 8, 2007.

Regards,

Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 fax
jerry.wickham@acgov.org

From: Chandler, Tom [<mailto:Tom.Chandler@lfr.com>]
Sent: Tuesday, October 30, 2007 4:32 PM
To: Wickham, Jerry, Env. Health
Subject: SLIC Case R00002478

This is a request for a 7 business day extension (to November 8, 2007) in the due date for the workplan to further characterize the TPH and metals impacts to the Learner Property located at 768 46th Avenue, Oakland, CA which you requested in your letter to Mr. Richard Neu dated July 11, 2007.

Thomas S. Chandler
Principal Engineer
LFR
3150 Bristol Street, Suite 250
Costa Mesa, CA 92626-7324
(714) 755-7229 Direct
(714) 444-0111 Main
(714) 444-0117 Facsimile
(714) 222-6101 Mobil
Tom.Chandler@lfr.com
Visit us at www.lfr.com

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10/30/2007

RO2478

Wickham, Jerry, Env. Health

To: Chandler, Tom
Cc: 'Krause, Jack'; 'Dick Peckham (dpeckham@westsidebmc.com)'; 'Saur, Robert'; 'Marcella Harrison'
Subject: RE: Westside & Learner Properties, Oakland

Based upon your request, the schedule for submittal of a Work Plan for the former AAA Equipment (case RO2746) and Learner Investment (case RO2478) sites is extended to October 30, 2007.

Regards,
Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 fax
jerry.wickham@acgov.org

From: Chandler, Tom [<mailto:Tom.Chandler@lfr.com>]
Sent: Friday, September 21, 2007 5:56 PM
To: Wickham, Jerry, Env. Health
Cc: 'Krause, Jack'; 'Dick Peckham (dpeckham@westsidebmc.com)'; 'Saur, Robert'; 'Marcella Harrison'
Subject: Westside & Learner Properties, Oakland

Attached is a request to extend the deadline for the submittal of workplans for the two referenced properties. Your consideration of this request is appreciated.

Thomas S. Chandler
Principal Engineer
LFR
3150 Bristol Street, Suite 250
Costa Mesa, CA 92626-7324
(714) 755-7229 Direct
(714) 444-0111 Main
(714) 444-0117 Facsimile
(714) 222-6101 Mobil
Tom.Chandler@lfr.com
Visit us at www.lfr.com

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9/25/2007



ENVIRONMENTAL MANAGEMENT & CONSULTING ENGINEERING

September 21, 2007

Jerry Wickman, P.G.
Hazardous Materials Specialist
Alameda County Environmental Health Department
Division of Environmental Protection
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 93402

Subject: Request for Extension for Submittal of Site Assessment Workplans for
SLIC Case RO0002746, AAA Equipment Company, 745 50th Avenue and
SLIC Case RO0002478, Learner Investment Company, 768 46th Avenue,
Oakland, California

Dear Mr. Wickman:

LFR, Inc. (LFR) is currently under contact with Westside Building Materials/Alta Properties (Westside, the current owners of the former AAA Equipment Company site located at 745 50th Avenue, Oakland, CA) and the Neu Investment Corporation (the current owners of the Learner Investment Company property located at 768 50th Avenue, Oakland, CA) to review the existing data and assist both parties in responding to your July 11, 2007 request for Site Assessment Workplans for the subject properties. Your July 11, 2007 letter also requested that Westside and the Neu Investment Company consider working cooperatively with the owners of the adjacent PG&E property located at 4930 Coliseum Way and Superior Plaster Castings property located at 4800 Coliseum Way, the two adjacent properties to the west.

LFR was granted access to the Alameda County Environmental Health Department (ACEHD) files on September 20, 2007 to obtain copies of the documents relating to the Learner property (the current owner did not have copies of the prior reports) and the Superior Plaster Casting site. There were several documents in the files for both sites and combined with the documents available for the PG&E site there is a lot of very important information to review and evaluate prior to developing an appropriate response to your request. Therefore, LFR is requesting an extension in the deadline to submit a response to your request for Site Characterization Workplans until October 30, 2007.

Your July 11, 2007 letter stated that there was a plume of volatile organic compounds (VOCs) extending under the Alta Site, Learner Site, Superior Plaster Site, and the PG&E Site and you encouraged the responsible parties to share data and develop comprehensive and compatible plans for each site. To date the responsible parties have only started preliminary communication and have not discussed details of any respective plans and have made no agreements to do so. An extension of the due date for a response to your request will allow more time for this process to materialize.

3150 Bristol Street, Suite 250
Costa Mesa, California 92626-7324
Offices Nationwide

714.444.0111 m
714.444.0117 f
www.lfr.com



LFR thanks you for your consideration of this request. If you have questions please call me at 714-755-7229.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas S. Chandler'.

Thomas S. Chandler
Principal Engineer

cc: Jack Krause, Alta Properties LLC, PO Box 2399, Oakland, CA
Marcella Harrison, GVA Kidder Mathews, 505 Sansome Street, Suite 300, San Francisco, CA
Robert Saur, PG&E 3400 Crow Canyon Road, San Ramon, CA 94583

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



F

ENVIRONMENTAL HEALTH SERVICES

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

July 11, 2007

Mr. Richard Neu
Edenwood Corp.
47 Parsippany Road
Whippany, NJ 07981

Subject: SLIC Case RO0002478 and Geotracker Global ID SLT2O150156, Learner Investment Company, 768 46th Avenue, Oakland, CA 94601

Dear Mr. Neu:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site. The site currently consists of two parcels (34-2293-2-2 and 34-2293-2-5) that extend from 46th Avenue to 50th Avenue in Oakland. This case is an open case but has been inactive for some time due to lack of regulatory oversight funds and a lack of response to regulatory requests. The property was used as a scrap metal-bailing plant from the 1960's until 1982. The property was used for storage of mechanical equipment after 1982. Current and planned future land use is unknown. The most recent technical reports in ACEH files are entitled, "Investigation Work Plan, Learner Investment Company, 768 46th Avenue, Oakland, California," dated February 16, 1993, "Site Assessment Work Plan, Learner Investment Company, 768 46th Avenue, Oakland, California," dated May 5, 1993, and "Remedial Action Plan for the Learner Property, 768 46th Avenue, Oakland, California," dated August 21, 1991. The Work Plans proposed soil and groundwater sampling from 8 soil borings near the former bailing area. The Remedial Action Plan proposed stabilization and capping to reduce human health and environmental risks at the site. No information or reports exist in the files to indicate that the scope of work proposed in either of the plans was implemented. In response to requests for regulatory oversight funds in correspondence dated December 26, 2000, March 30, 2006, and February 2, 2007, Neu Investment Company submitted funds for regulatory oversight in April 2007.

Site investigations conducted to date have detected elevated concentrations of petroleum hydrocarbons, polychlorinated biphenyls (PCBs), and metals in soils in various areas of the site including the area of the former bailing plant, soil piles from site grading, a former railroad spur, and a former access road from 50th Avenue. We request that you submit a Work Plan to complete site characterization in these areas. The Work Plan should include a compilation of site history and land uses including Phase I and Phase II reports, a site conceptual model, maps showing the distribution of analytical data, tables of historic data, and maps of proposed soil and groundwater sampling locations.

In addition to the areas of soil contamination discussed in the previous paragraph, elevated concentrations of petroleum hydrocarbons and volatile organic compounds (VOCs) have been detected in soil and groundwater within an area that is contiguous with parcel 34-2293-2-5. Chlorinated solvents, including 1,3-dichlorobenzene and 1,4-dichlorobenzene, have been detected in groundwater samples collected from monitoring wells on the adjacent PG&E property at 4930 Coliseum Way (Case RO0000099), which is downgradient from the Learner property.

Chlorinated solvents have also been detected in soil and groundwater samples collected at two other adjacent properties (AAA Equipment at 745 50th Avenue owned by Alta Properties LLC [Case RO0002746] and Superior Plaster Castings at 4800 Coliseum Way [Case RO0002661]). The chlorinated solvents appear to be from a common source of historic releases that occurred on each of the four properties (PG&E, Learner Property, AAA Equipment, and Superior Plaster Casting), resulting in a commingled plume. Therefore, all parties are considered responsible for the release. We encourage all parties to cooperate in terms of sharing data and generating compatible and comprehensive Corrective Action Plans for their sites. Whether you choose to investigate this source of contamination on your property individually or in conjunction with the other three responsible parties, we request that you submit plans for investigation of this area of your site **no later than September 17, 2007.**

REQUEST FOR INFORMATION

The list below identifies documents currently in the ACEH case files. We request that you provide copies of any more recent or historic documents that are not in ACEH files and are relevant to this SLIC case **by September 17, 2007.**

Documents Currently in ACEH Files:

Dames & Moore. 1988. "Environmental Site Assessment and Sampling Plan, 768 46th Avenue, Oakland, CA" June 3, 1988.

Kaprealian Engineering, Inc. 1988. "Soil Sampling Report, Learner Company, 768 46th Avenue, Oakland, CA" July 19, 1988.

Dames & Moore. 1988. "Supplemental Sampling Plan, Learner Company Property, 768 46th Avenue, Oakland, CA" July 22, 1988.

Dames & Moore. 1988. "Phase II Environmental Site Assessment, Learner Investment Company Property, 768 46th Avenue, Oakland, CA," August 26, 1988.

Kleinfelder, Inc. "Revised Work Plan for Soil Assessment, The Learner Company Property, 768 46th Avenue, Oakland, CA," June 15, 1989.

Weiss Associates. "Remedial Action Plan for the Learner Property, 768 46th Avenue, Oakland, CA," August 21, 1991.

Weiss Associates. "Investigation Work Plan, Learner Investment Company, 768 46th Avenue, Oakland, CA," February 16, 1993.

Weiss Associates. "Site Assessment Work Plan, Learner Investment Company, 768 46th Avenue, Oakland, CA," May 5, 1993.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Jerry Wickham), according to the following schedule:

- **September 6, 2007** – Site Investigation Work Plan

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

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.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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.

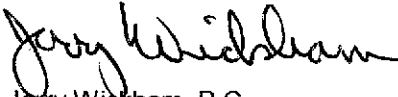
Mr. Richard Neu
RO0002478
July 11, 2007
Page 4

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 call me at (510) 567-6791.

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Ms. Marcella Harrison, GVA Kidder Mathews, 505 Sansome Street, Suite 300, San Francisco, CA 94111

Mr. Jack Krause, Alta Properties, LLC, P.O. Box 2399, Oakland, CA 94614

Mr. Robert Saur, PG&E, 3400 Crow Canyon Road, San Ramon, CA 94583

Mr. Robert Nichols, P.O. Box 6716, Oakland, CA 94603

Mr. John Miller, 250 Cambridge Avenue, Palo Alto, CA 94306

Mr. Robert Schultz, Geomatrix, 2101 Webster Street #12, Oakland, CA 94612

Donna Drogos, ACEH
Jerry Wickham, ACEH
File



505 Sansome Street, Suite 300
San Francisco, CA 94111
Tel: 415.229.8888
Fax: 415.229.8987
www.gvakm.com

April 3, 2007

Mr. Ariu Levi
Division Chief
Alameda County Health Care Services
1131 Harbor Bay Parkway
Suite 250
Alameda, CA 94502

Dear Mr. Levi:

On behalf of Amy Neu, Edenwood Corporation, enclosed is the check in the amount of \$3,000.00 requested by your office in the March 30, 2006 letter. The site address is 768 46th Avenue in Oakland. The SLIC Case RO0002478; AR# 0306002.

Sincerely,

A handwritten signature in cursive script that reads "Marcella D. Harrison".

Marcella D. Harrison
Agent for the Neu family

Encl.

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND-NOT A WHITE BACKGROUND

NEU INVESTMENT CORPORATION
47 PARSIPPANY ROAD
WHIPPANY, NJ 07981

AR - 206002

RD - 2478

84204.16 1865.00

BANK OF AMERICA
231 SOUTH LA SALLE STREET
CHICAGO, IL 606971

12123 - 447
31217 - 63
38006 - 112
46561 - 32

50581 - 116
58052 - 66.40
58892 - 99.60
62387 - 116.
69200 - 83.00

Date
3/28/2007

Check No.
000056

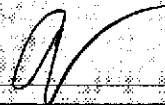
Check Amount
3,000.00

Three Thousand AND 00/100 Dollars

Pay to the order of:

VOID IF NOT CASHED WITHIN DAYS WITHIN DATE OF ISSUE

ALAMEDA COUNTY ENVIRONMENTAL HEALTH
1131 HARBOR BAY PARKWAY
SUITE 250
ALAMEDA, CA 94502-6577



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⑈000056⑈ ⑆081904808⑆ 002873028835⑈

Ent	Name	Acct No	Check	Date	P.O. Num	Refer	Amount	Discount	Net
02	Neu Investment Corp	12953-00	DEPOSIT	3/16/2007		SLIC AR# 0306002	3,000.00	0.00	3,000.00

Payor: NEU INVESTMENT CORPORATION
 Payee: ALAMEDA COUNTY ENVIRONMENTAL HEALTH
 Date: 3/28/2007
 Check No.: 000056
 Check Amount: 3,000.00

Retain this statement for your records

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND-NOT A WHITE BACKGROUND

NEU INVESTMENT CORPORATION
 47 PARSIPPANY ROAD
 WHIPPANY, NJ 07981

BANK OF AMERICA
 231 SOUTH LA SALLE STREET
 CHICAGO, IL 606971

Date: 3/28/2007
 Check No.: 000056
 Check Amount: 3,000.00

Three Thousand AND 00/100 Dollars

Pay to the order of:

ALAMEDA COUNTY ENVIRONMENTAL HEALTH
 1131 HARBOR BAY PARKWAY
 SUITE 250
 ALAMEDA, CA 94502-6577

VOID IF NOT CASHED WITHIN DAYS WITHIN DATE OF ISSUE

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ALAMEDA COUNTY
HEALTH CARE SERVICES



7

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

March 30, 2006

Mr. Richard Neu
Edenwood Corp.
47 Parsippany Road
Whippany, NJ 07981

Subject: SLIC Case [REDACTED] Investment Company, 768 46th Avenue, Oakland, CA

Dear Mr. Neu:

Our records indicate that the current balance on the above-referenced SLIC oversight account is a negative \$770.00. In order to continue to provide regulatory oversight, we are requesting the submittal of a check made payable to Alameda County Environmental Health in the amount of \$3,000.00. Please send your check to the attention of our Finance Department.

This deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, an additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project is being debited at the Ordinance specified rate, currently \$166.00 per hour.

Please write "SLIC" (the type of project), the site address, and the AR# 0306002 on your check.

If you have any questions, please contact Jerry Wickham at (510) 567-6791.

Sincerely


Ariu Lévi
Division Chief

cc: D. Drogos, J. Jacobs, Jerry Wickham

ALAMEDA COUNTY
HEALTH CARE SERVICES

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

StID 3705

December 26, 2000

Mr. Richard Neu
Edenwood Corp.
47 Parsipiny Road
Whippany, NJ 07981

**RE: Project #162A, Add-on
at 768 46th Avenue, Oakland, CA 94601**

Dear Mr. Neu:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. Enclosed is a summary of deposits and charges to the account. A total of \$1800.00 was deposited. To date, a total of \$1982.75 was charged. The account is currently in a **negative balance of \$182.75**. To replenish the account, please submit an additional deposit of \$1500.00, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested, or any unused monies will be refunded to you or your designee.

The deposit/refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$105 per hour.

Please be sure to write the following identifying information on your check:

project #162A/ Stid #3705
type of project (site mitigation, add-on), and
site address (768 46th Avenue, Oakland, CA)

If you have any questions, please contact me at (510) 567-6762.

eva chu
Hazardous Materials Specialist

***** Alameda County Department of Environmental Health *****
 Deposit/Refund Account History

** PROJECT INFORMATION **

Project#: ---162A Date Open: 04/26/1988 Date Closed:

Payor Information:

Site Information:

LEARNER INVESTMENT COMPANY
 2711 NAVY DRIVE
 STOCKTON CA 95206

THE LERNER CO
 768 - 46th Avenue
 Oakland CA 94601

** DEPOSIT HISTORY **

Deposit Date	Receipt#	Amount Received
04/26/1988	505662	\$ 300.00
03/07/1994	725559	\$ 1,500.00

		\$ 1,800.00

** WORKLOG HISTORY **

Work Date	Insp	Activity Description / Time Spent (hrs)	Amount Charged
03/24/1988		site review	2. 106.0
04/12/1988		plan review \$\$53/hr	53.0
04/26/1988		ADMIN FEE AT 25% OF DEPOSIT	75.0
11/15/1991		File Review	2. 134.0
03/04/1992		REVIEW CASE	0.5 35.5
03/25/1992	ec	review transfer to LOP	1.5 106.5
04/20/1992		TRANSFER CASE TO P.SMITH	0.25 17.7
05/24/1992		REVIEW CASE	3. 213.0
07/20/1992	ps	call w/E.Swenson	0.25 17.7
08/24/1992	ps	File Review	3. 213.0
08/27/1992	ps	Plan review	1.5 106.5
08/31/1992		Letter	3. 213.0
09/11/1992		CALL W/DAVID	0.25 17.7
12/09/1992		call w/Everett	0.25 17.7
02/16/1993	ps	call w/Swenson	0.25 18.7
03/15/1993		review/letter	2. 150.0
03/22/1993	ps	letter	1.5 112.5
04/06/1993		Letter	1.5 112.5
05/10/1993		review call w/B.Devanez	1. 75.0
05/13/1993		review SSP	0.25 18.7
05/17/1993		On-site visit	1.5 112.5
11/23/1993	ps	call w/Hecht/Bob	0.75 56.2

\$ 1,982.75

Balance:\$

- 182.75

Amount Refunded:

\$

No longer owned by Hearno Co. since May 1994
currently owned by one of the brothers

Richard New in New Jersey
Eden Wood Corp.
47 Parsipiny Rd
Whippany, 07981
NJ

Amy New - daughter
manages co.

(973) 428 0065

8-430 pm MF EDT

other brother in N.Y.
John New

Matt Harris manages properties. (use to per - Hecht)

ALAMEDA COUNTY
HEALTH CARE SERVICES

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

November 26, 1997

ATTN:

Learner Investment Co
2711 Navy Dr
Stockton CA 95206

RE: Project # 162A - Type A
at 768 46th Ave in Oakland 94601

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$182.75, payable to Alameda County, Environmental Health Services.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested or any unused monies will be refunded to you or your designee.

The deposit refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$94 per hour.

Please be sure to write the following identifying information on your check:

- project #
- type of project and
- site address

(see RE: line above).

If you have any questions, please contact Tom Peacock at (510) 567-6782.

Sincerely,

Tom Peacock, Manager
Environmental Protection

c: files/inspector

Printed: 11/26/97

***** Alameda County Department of Environmental Health *****
BILLING's WORKLOG: Total Deposit/Refund History for All Accounts at Site
~~~~~

\*\* SITE INFORMATION \*\*

Site#: 162 -- StID: 3705 Lerner Co., The  
Date Open: 04/26/88 768 - 46th Avenue  
Date Closed: Oakland CA 94601

\*\* PAYOR INFORMATION \*\*

> Project # ---162A for Payor # 795 LEARNER INVESTMENT COMPANY  
2711 NAVY DRIVE  
STOCKTON CA 95206

\*\* DEPOSIT HISTORY \*\*

| Proj#   | Deposit Date | Receipt# | Amount Received |
|---------|--------------|----------|-----------------|
| ---     | -----        | -----    | -----           |
| ---162A | 04/26/88     | 505662   | \$ 300.00       |
| ---162A | 03/07/94     | 725559   | \$ 1,500.00     |
|         |              |          | =====           |
|         |              |          | \$ 1,800.00     |

\*\* WORKLOG HISTORY \*\*

| Proj#   | Work Date | Activity Description        | Insp | Time (hrs) | Amount Charged |
|---------|-----------|-----------------------------|------|------------|----------------|
| ---     | -----     | -----                       | ---- | -----      | -----          |
| ---162a | 03/24/88  | site review                 |      | 2.         | \$106.00       |
| ---162a | 04/12/88  | plan review @\$53/hr        |      |            | \$53.00        |
| ---162A | 04/26/88  | ADMIN FEE AT 25% OF DEPOSIT |      |            | \$75.00        |
| ---162a | 11/15/91  | File Review                 |      | 2.         | \$134.00       |
| ---162A | 03/04/92  | REVIEW CASE                 |      | 0.5        | \$35.50        |
| ---162a | 03/25/92  | review transfer to LOP      | ec   | 1.5        | \$106.50       |
| ---162A | 04/20/92  | TRANSFER CASE TO P.SMITH    |      | 0.25       | \$17.75        |
| ---162A | 05/24/92  | REVIEW CASE                 |      | 3.         | \$213.00       |
| ---162a | 07/20/92  | call w/E.Swenson            | ps   | 0.25       | \$17.75        |
| ---162a | 08/24/92  | File Review                 | ps   | 3.         | \$213.00       |
| ---162a | 08/27/92  | Plan review                 | ps   | 1.5        | \$106.50       |

|         |          |                         |    |      |            |
|---------|----------|-------------------------|----|------|------------|
| ---162A | 08/31/92 | Letter                  |    | 3.   | \$213.00   |
| ---162A | 09/11/92 | CALL W/DAVID            |    | 0.25 | \$17.75    |
| ---162a | 12/09/92 | call w/Everett          |    | 0.25 | \$17.75    |
| ---162a | 02/16/93 | call w/Swenson          | ps | 0.25 | \$18.75    |
| ---162a | 03/15/93 | review/letter           |    | 2.   | \$150.00   |
| ---162a | 03/22/93 | letter                  | ps | 1.5  | \$112.50   |
| ---162a | 04/06/93 | Letter                  |    | 1.5  | \$112.50   |
| ---162a | 05/10/93 | review call w/B.Devanez |    | 1.   | \$75.00    |
| ---162a | 05/13/93 | review SSP              |    | 0.25 | \$18.75    |
| ---162a | 05/17/93 | On-site visit           |    | 1.5  | \$112.50   |
| ---162a | 11/23/93 | call w/Hecht/Bob        | ps | 0.75 | \$56.25    |
|         |          |                         |    |      | -----      |
|         |          |                         |    |      | \$1,982.75 |

Balance:           -\$182.75   Amount Refunded:

=====



**EVANS BROTHERS INC.**

7589 NATIONAL DRIVE  
LIVERMORE, CALIF. 94550-9713  
CONT. LIC. 443018  
Tel (510) 443-0225  
Fax (510) 443-0229

November 25, 1997


Mr. Tom Peacock  
Supervising Hazardous Material Specialist  
**Alameda County Health Agency**  
Department of Environmental Health  
1131 Harbor Bay Parkway - 2nd Floor  
Alameda, CA 94502

Dear Mr. Peacock:

In cooperation with your agency I wish to observe your files on site #3705 this afternoon. As you explained yesterday this request is accompanied by a staff time charge of \$94.00 per hour. My company is willing to pay this fee and I will have a check with me today.

Thank you for your help.

Sincerely,

  
Bill Crotinger

P.S. Please confirm a time as early as possible  
Office # 510-443-0225  
Fax # 510-443-0229  
Pager # 510-306-4425

BC:ln  
Property



*John R. Crawford*

**EVANS BROTHERS INC.**  
*General Engineering  
&  
Demolition Contractors*

Tel (510) 443-0225                      7589 National Drive  
Fax (510) 443-0229                      Livermore, CA 94550-9713



**EVANS BROTHERS INC.**

7589 NATIONAL DRIVE  
LIVERMORE, CALIF. 94550-9713  
CONT. LIC. 443018  
Tel (510) 443-0225  
Fax (510) 443-0229

***FAX TRANSMITTAL***

**COMPANY:** Alameda County Health Agency

**FROM:** Bill Crotinger

**ATTN:** Tom Peacock

**DATE:** November 25, 1997

**DEPT:** of Environmental Health

**NO. PAGES:** 2  
**(INCLUDING COVER SHEET)**

**FAX NO.:** 337-9335

**REF:** Observe files on site #3705

**COMMENTS:**

\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_

**\*PLEASE CONTACT THE FOLLOWING NUMBERS IF DIFFICULTY IN TRANSMISSION IS ENCOUNTERED:**

**PHONE (510) 443-0225**

**FAX (510) 443-0229**

\*\*\*\*\* -IND. XMT JOURNAL- \*\*\*\*\* DATE 11-25-1997 \*\*\*\*\* TIME 11:13AM \*\*\*\*\*

JOURNAL No. = 17  
DATE/TIME = 11-25-1997 11:12AM  
DURATION = 00:00'44  
COMM.RESULT = OK  
PAGE(S) = 002  
MODE = TRANSMISSION  
DESTINATION = 3379335  
RECEIVED ID = 510 337 9335  
RESOLUTION = STD

-Evans Brothers Inc. -

\*\*\*\*\* ( FAX-200 U2.17)\* - 510 443 0229- \*\*\*\*\*

**Alameda County Environmental Health Services  
Environmental Protection Division**  
1131 Harbor Bay Parkway, Rm 250, Alameda CA 94502-6577  
Ph: 510-567-6700 Fax: 510-337-9335

**WORK ORDER**

MFR# or STID# 3705

A. Site Name The Learner Co. Phone \_\_\_\_\_  
 Site Address 768 - 46th Ave Oakland, 94601  
(if no address, description of area) Number Street City Zip  
 Prior Business Name \_\_\_\_\_ Prior Owner's Name \_\_\_\_\_

B. Service Requestor Bill Cratinger Francis Brothers Inc, 443-0205  
Contact Person Company Name Phone  
 Billing Address 7589 National Dr Livermore, CA 94550-9713  
Number Street City Zip

| Category of Service                             |  | # of Whole Hours | x \$                 |                        |
|-------------------------------------------------|--|------------------|----------------------|------------------------|
| <input type="checkbox"/> Site Search            |  | <u>1.0</u>       | <u>94.00</u>         | <u>94.00</u>           |
| <input checked="" type="checkbox"/> File Search |  | <u>29</u>        | <u>2.40</u>          | <u>2.40</u>            |
| <input type="checkbox"/> Other _____            |  |                  | x \$ _____           | \$ _____               |
|                                                 |  |                  | <b>TOTAL CHARGE:</b> | <b>\$ <u>96.40</u></b> |

REMARKS: 61L # 5025  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

All services will be charged in accordance with Article II of Chapter 6, Title 3 of the Ordinance Code of Alameda County

Authorized by Bill Cratinger [Signature] Date 11/27/97  
Printed Name Signature  
 Specialist James Reacode [Signature] Date 11/27/97  
Printed Name Signature

Security enhanced document. See back for details.

**EVANS BROTHERS, INC.**

4330 QUAIL RUN LN  
DANVILLE, CA 94506

5025

DATE 11-25-97

11-36/1210  
225

PAY TO THE ORDER OF County of Alameda \$ 96<sup>40</sup>/<sub>100</sub>  
Ninety six dollars and <sup>40</sup>/<sub>100</sub> DOLLARS

**Bank of America** (510) 833-8588  
Danville Branch #0226  
620 San Ramon Valley Boulevard  
Danville, CA 94526

FOR [Signature]

⑈005025⑈ ⑆121000358⑆ 82254⑈0496⑈⑈

GUARDIAN • SAFETY

REF./A/C NO. File Search  
Consultation

COUNTY OF ALAMEDA  
OFFICE OF THE AUDITOR-CONTROLLER

DATE: 11 125 197

No 804824

MISCELLANEOUS RECEIPT

Ninety Six 40/100 \$ 96.40 DOLLARS

RECEIVED FROM: Evans Brothers, INC 4330 Quail Run LN, Danville, Ca 94506  
FOR: The Learner Corp  
768 - 46th AVE, Oakland, 94601

RECEIVED BY: J Battie DEPT. NO.: 430-4530

CASH  PERSONAL/CASHIER'S CHECK/M. O. # 5025  OTHER:

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION  
DEPOSIT / REFUND ACCOUNT SHEET

printed 06/05/97

SITE INFORMATION

Learner Co, The  
768 46th Ave  
Oakland 94601  
Site Contact:  
Site Phone :

StID: 3705 Site#: 162  
PROJECT#: 162A  
PROJECT TYPE:\*\*\* R \*\*\*  
INSP: Madhulla Logan  
ACCT. SHEET PG #: \_\_\_\_\_

PROPERTY OWNER INFORMATION

Owner Contact:  
Owner Phone :

PAYOR INFORMATION

R W Johnston & Son  
802 53rd Ave  
Oakland CA 94601 # 71  
Payor Contact: Stephen B Johnston  
Payor Phone : 415-261-9424

| Date    | Action Taken                   | Insp<br>Init | Hours<br>Spent/<br>Depstd | Hour<br>Balnce | Money<br>Spent/<br>Depositd | Money<br>Balance |
|---------|--------------------------------|--------------|---------------------------|----------------|-----------------------------|------------------|
|         | Rcpt# 505662                   |              |                           |                |                             |                  |
|         | Balance from Prev. Page        |              |                           |                |                             | 448.50           |
| 2/25/92 | review for transfer Log        | EC           | 1.5                       | 71/hr          | 106.50                      | 342.-            |
| 7/20/92 | tel con re Sorenson            | PS           | 0.25                      | 71/hr          | 17.75                       | 324.25           |
| 8/24/92 | review case                    | PS           | 3.0                       | 71/hr          | 213.-                       | 111.25           |
| 8/27/92 | review                         | PS           | 1.5                       | 71/hr          | 106.50                      | 4.75             |
| 2/16/93 | tel con re Sorenson            | PS           | 0.25                      | 75/hr          | 17.75                       | -13.-            |
| 3/22/93 | letter to J. Hecht             | PS           | 1.5                       | 75/hr          | 106.50                      | -119.50          |
| 4/23/93 | tel con J. Hecht / Bob DeVaney | PS           | 0.75                      | 75/hr          | 56.25                       | -175.75          |

UPON COMPLETION OF PROJECT

PROJ COMPLETED BY : \_\_\_\_\_ ATTACH:  State Forms A, B & C  
 Billing Adjustment\*

DATE OF COMPLETION : \_\_\_\_\_ DATE SENT TO BILLING: \_\_\_\_\_

TOTAL COST OF PROJECT: \_\_\_\_\_ REFUND AMOUNT: \_\_\_\_\_ Rev. 7/96

\* Billing adjustment forms needed when site is in our UST program.



Listing of HAZMAT - FULL SITE HISTORY since 1987 for StID # 3705  
as of 06/05/97 .... all Activity Codes

SITE NAME & ADDRESS:

Lerner Company -- 768 46th Ave , Oakland CA 94601

| InspDat           | Insp Act | InspT | StID  | Proj# | COMMENTS                                                                                | DailBDat |
|-------------------|----------|-------|-------|-------|-----------------------------------------------------------------------------------------|----------|
| Archived Dailies: |          |       |       |       |                                                                                         |          |
| InspDat           | Insp Act | InspT | StID  | DRPro | Comment                                                                                 | DailBDat |
| 02/25/92          | EC       | 75    | 1.5   | 3705  | 162A review for transfer to LOP                                                         |          |
| 07/20/92          | PS       | 77    | 0.25  | 3705  | 162A tel con w/ Everett Sorenson re:<br>Lerner Investment, 768 46th Ave,<br>Oakland, CA |          |
| 08/24/92          | PS       | 75    | 3.    | 3705  | 162A review Lerner Property 768 46th<br>Ave, Oakland, 94601                             |          |
| 08/27/92          | PS       | 75    | 1.5   | 3705  | 162A review site mit slic case                                                          |          |
| 08/31/92          | PS ✓     | 74    | 3 (5) | 3705  | 162A review and letter re sub surface<br>cont.                                          |          |
| 09/11/92          | PS ✓     | 83    | 0.25  | 3705  | tel con David Osako re site<br>search Lerner                                            |          |
| 09/17/92          | DH       | 83    | 0.3   | 3705  |                                                                                         |          |
| 09/17/92          | PS       | 83    | 1.25  | 3705  | site search                                                                             |          |
| 02/16/93          | PS       | 77    | 0.25  | 3705  | 162A telcon Everett Sorenson re:<br>workplan extension Lerner 768<br>46th Ave, 94601    |          |
| 03/15/93          | PS ✓     | 75    | 2.    | 3705  | 162A review plan and write letter,<br>Lerner prop                                       |          |
| 03/22/93          | PS       | 74    | 1.5   | 3705  | 162A letter to Jack Hecht                                                               |          |
| 04/06/93          | PS ✓     | 74    | 1.5   | 3705  | 162A letter to Jack Hecht                                                               |          |
| 05/13/93          | PS ✓     | 75    | 0.25  | 3705  | 162A review site safety plan, prior<br>to initiation of phase II work                   |          |
| 05/17/93          | PS ✓     | 77    | 1.5   | 3705  | 162A site visit Phase II invest                                                         |          |
| 11/23/93          | PS       | 77    | 0.75  | 3705  | 162A telcons Jack Hecht, Bob DeVaney,<br>note to file                                   |          |
| 04/30/94          | BJ       | 61    | 2.5   | 3705  | Capt. Mike Fahey & I went to<br>look at this site drums of<br>monitoring well spoils    |          |

Current Dailies:

NO WORK FOR THIS SITE IS IN CURRENT DAILIES:

Complete

|         |                                  |      |                     |
|---------|----------------------------------|------|---------------------|
| ---162a | 04/06/93 ✓ Letter                | 1.5  | \$112.50            |
| ---162a | 05/10/93 review call w/B.Devanez | 1.   | \$75.00             |
| ---162a | 05/13/93 ✓ review SSP            | 0.25 | \$18.75             |
| ---162a | 05/17/93 ✓ On-site visit         | 1.5  | \$112.50            |
|         |                                  |      | -----<br>\$1,351.50 |

Balance: \$448.50 Amount Refunded:

=====

\*\*\*\*\* Alameda County Department of Environmental Health \*\*\*\*\*  
 BILLING's WORKLOG: Total Deposit/Refund History for All Accounts at Site  
 ~~~~~

** SITE INFORMATION **

Site#: 162 -- StID: 3705 Lerner Co., The
 Date Open: 04/26/88 768 - 46th Avenue
 Date Closed: Oakland CA 94601

** PAYOR INFORMATION **

> Project # ---162A for Payor # 795 LEARNER INVESTMENT COMPANY
 2711 NAVY DRIVE
 STOCKTON CA 95206

** DEPOSIT HISTORY **

Proj#	Deposit Date	Receipt#	Amount Received
---162A	04/26/88	505662	\$ 300.00
---162A	03/07/94	725559	\$ 1,500.00
			=====
			\$ 1,800.00

** WORKLOG HISTORY **

Proj#	Work Date	Activity Description	Insp	Time (hrs)	Amount Charged
---162a	03/24/88	site review		2.	\$106.00
---162a	04/12/88	plan review @\$53/hr			\$53.00
---162A	04/26/88	ADMIN FEE AT 25% OF DEPOSIT			\$75.00
---162a	11/15/91	File Review		2.	\$134.00
---162A	03/04/92	REVIEW CASE		0.5	\$35.50
---162A	04/20/92	TRANSFER CASE TO P.SMITH		0.25	\$17.75
---162A	05/24/92	REVIEW CASE		3.	\$213.00
---162A	08/31/92	✓Letter		3.	\$213.00
---162A	09/11/92	✓CALL W/DAVID		0.25	\$17.75
---162a	12/09/92	call w/Everett		0.25	\$17.75
---162a	03/15/93	review/letter		2.	\$150.00

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION

06/05/97

UNDERGROUND STORAGE TANK CLEANUP SITE

AGENCY#: 10000	SOURCE OF FUNDS: ---0-	INSPECTOR: ML
StID: 3705	SUBSTANCE: -0- --0-	
SITE NAME: Learner Co., The		DATE REPORTED : -0-
ADDRESS : 768 46th Ave		DATE CONFIRMED: -0-
CITY/ZIP : Oakland, CA 94601		MULTIPLE RP's : -
CASE TYPE: - CONTRACT STATUS: - PRIOR:-0- EMERGENCY RESPONSE: -0-		
RP SEARCH : -		DATE END: -0-
PRELIM ASSESSMENT : -	DATE BEGIN: -0-	DATE END: -0-
REMEDIAL INVESTIG : -	DATE BEGIN: -0-	DATE END: -0-
REMEDIAL ACTION : -	DATE BEGIN: -0-	DATE END: -0-
POST REMED MONITOR: -	DATE BEGIN: -0-	DATE END: -0-
TYPE ENFORCEMENT ACTION TAKEN: - DATE OF ENFORC. ACTION: -0-		

UNDERGROUND STORAGE TANK CLEANUP SITE - SCREEN #2

LUFT FIELD MANUAL CONSIDERATION: -0-	CASE CLOSED: - on: -0-
DT EXC START: -0-	REMEDIAL ACTIONS TAKEN: -0-
RP #1: CONTACT: -0-	RP COST: -0-
RP COMPANY NAME: -0-	Ph: -0-
ADDRESS: -0-	
CITY/STATE: -0-	
-0-	

Listing all LOP DAILY activities since 1991 for StID # 3705 as of 06/05/97

- Act91_4
- Act92_1
- Act92_2
- Act92_3
- Act92_4
- Act92_5
- Act93_1
- Act93_2
- Act93_3
- Act93_4
- Act94_1
- Act94_2
- Act94_3
- Act94_4
- Act95_1

ALAMEDA COUNTY ENVIRONMENTAL HEALTH - HAZARDOUS MATERIALS PROGRAM
 INFORMATION PER SITE ON ALL DEPOSITS FROM ALL PAYORS

as of 06/05/97

DATABASE: DEPREF

===== SITE INFORMATION from DepRef DB =====

Learner Co, The
 768 46th Ave
 Oakland CA 94601

StID: 3705 Site#: 162 Site Complete?

===== ALL PAYORS ON SITE =====

> Project# 162A for Payor# 71 R W Johnston & Son
 802 53rd Ave
 Oakland CA 94601

> Project# 162A for Payor# 795 Learner Investment Co
 2711 Navy Dr
 Stockton CA 95206

DR:WkShtPay

===== DEPOSIT INFORMATION =====

Project#	Rcpt#	DepDate	DepAmount	Proj Type	Deposit Complete	Insp Init	Collect Fees?
162A	<-----						
	505662	04/26/88	\$300.00	R		ML	
	725559	03/07/94	\$1,500.00	A		ML	
Total Deposit for Project:			\$1,800.00				

Total Deps for all Sites :			\$1,800.00				

Report WkShtDep Complete; 3/97

LAST WORK DATE FROM BILLING ON THIS SITE:

3705 ---162?
 0

DATE: Madhulla

TO : Medhulla Logan

FROM: Paul Smith

SUBJ: Transfer of Slic cases

Site name: Learner Co (Investment Co)

Address: 768 - 46th Avenue City Lakewood Zip 94601

Stid # _____

This site is also regulated by the following programs:

Gen _____ UGT _____ LOP _____ Storm Water _____

Contamination level: _____ (ppm, TTLC, STLC, in order of hazard)

additional: _____

send a letter

DepRef remaining \$ _____ Do not transfer a case with less than \$100. Request and receive additional funds first!

Have you made all entries on the deposit/refund account sheet? negative

This is in negative

Is the site file organized with all pertinent information in it? _____

Date of last correspondence from this office: Feb 1997 work plan Alumina

Date of last workplan/technical report: Jan 27/1993 Text letter

1. There was a workplan they submitted in 1993 approved by county water conditions
2. They have petro hydro, metals, PCB's - pretty high conc - for some

Contact - Robert Devany - Weiss - 4150-6144 - Associates 424-6990

RP - JACK HECHT - (209)948-3498

3 conditions of workplan approved in April 7 letter by Paul

They did all the work mentioned
by Paul. Now they are working
on pulling together a report on work
done so far.

~~Not~~ ~~contamination~~ So far only
characterization has been done. But
they still have tab 6-10 (characterization).

Well they are not too motivated but O.K.
They are supposed to get in touch with
us in December for the second
phase of investigation.

***** Alameda County Department of Environmental Health *****
 Deposit/Refund Account History

** PROJECT INFORMATION **

Project#: ---164A Date Open: 04/26/88 Date Closed:

Payor Information: _____ Site Information: _____

R W Johnston & Son
 801 ---53rd Ave.
 Oakland CA 94601

Lerner Co., The
 3675 Alameda Ave.
 Oakland CA 94601

** DEPOSIT HISTORY **

<u>Deposit Date</u>	<u>Receipt#</u>	<u>Amount Received</u>
04/26/88	505664	300.00

		300.00

** WORKLOG HISTORY **

<u>Work Date</u>	<u>Activity Description / Time Spent (hrs)</u>	<u>Amount Charged</u>
05/20/88	PLAN REVIEW 1 HR @\$53/HR	53.00

		53.00

Balance: 247.00 Amount Refunded:

JOHN B. HOOK
RONALD E. MALLEN*
HOWARD M. GARFIELD
JOSEPH P. McMONIGLE
DONALD W. CARLSON
DAVID W. EVANS
MARSHA L. MORROW
BARRY D. BROWN
MICHAEL L. BOLI
JOHN E. PEER
RUSSELL S. ROECA
GUY D. CALLADINE
ROBERT M. PETERSON
EDWARD F. DONOHUE, III
MARK SIMON KANNETT
DON A. LESSER
ROBERT C. CHILES

*A PROFESSIONAL
CORPORATION

ESTHER Z. HIRSH
KEVIN P. KAMRACZEWSKI
CHRISTOPHER T. BORGESON
LINDA LANDRY MILLER
RANDALL A. MILLER
ELIZABETH A. COLPOYS
DAVID IAN DALBY
JOYCE C. WANG
DAVID C. VEIS
J. KEVIN SNYDER
DEBRA BAKER
MICHAEL A. VASQUEZ
MARTIN T. LEE

EDWARD D. HAAS
OF COUNSEL
LINDA S. VOTAW
SENIOR COUNSEL
WEISBACH HIGGINBOTHAM P.C.
OF COUNSEL

BERT W. LEVIT (1903-1980)
PERCY V. LONG (1870-1953)

LONG & LEVIT

A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

633 WEST FIFTH STREET, SUITE 5900
LOS ANGELES, CALIFORNIA 90071

TELEPHONE: (213) 356-5900
FACSIMILE: (213) 613-0664

101 CALIFORNIA STREET, SUITE 2300
SAN FRANCISCO, CALIFORNIA 94111

TELEPHONE: (415) 397-2222
FACSIMILE: (415) 397-6392

IRA D. GOLDBERG
JEFFREY D. LIVINGSTON
JULIET A. LEFTWICH
MICHAEL C. COOPER
MARK L. NISSENBAUM
LORI D. ZACK
JOHN M. BARRELL
BARBARA W. ENGLER
CLAIRE L. CORTNER
JEANETTE TRAVERSO
KATHLEEN M. MCKNIGHT
RYAN T. RUSSELL
REILLY ATKINSON
JUDITH A. TURVY
MICHAEL J. ESTRADA
STEPHEN J. KAUFMAN
ROBERT J. ROMERO
ROBERT A. O'BRIEN
GRETCHEN S. CARNER
SHERRI J. CONRAD
JEFFREY E. MILLER
LAURA M. PULIDO
JOLYNN M. KLEIN
EDWARD T. MURAMOTO
GERALD K. CARROLL

CORY M. MARTIN
DEBBIE L. LEE
JEFFREY A. DOLLINGER
RENELE M. ESPINOZA
SHERMAN C. LEE
JOHN R. MILLER
SCOTT J. HYMAN
DAVID P. OSAKO
ANN L. STRAYER
DOW W. PATTEN
ALLISON LANE
MARK K. WILLIAMS
KATHLEEN M. EWINS
LAUREN O'BRIEN
WILLIAM E. WADDELL
PATRICIA M. de la PEÑA
KELLEY M. BROWN
ELIZA M. RODRIGUES
SARAH J. VALENTINE
LOUISE E. ABBIS
CHRISTINE L. JUDAS
DOUGLAS J. MELTON
CHRISTINE D. RYAN
SETH A. GOLD
KRISTINA H. CHUNG
PAULE VALLONE
HENRY O. SCHAEFER

January 24, 1995

Amir Gholami
Alameda County Health Services
Department of Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, CA 94502

Re: (1) 301, 401 & 411 High Street/Big B Lumbertina
3675 Alameda Street, Oakland, CA 94601
(2) 768 46th Avenue, Oakland, CA 94601

Dear Mr. Gholami:

I will be in the bay area between February 23, 1995 and February 26, 1995. I would like to make an appointment to review your files regarding the referenced sites on February 23, 1995 at 10:00 a.m. I understand that a non-technical staff review will cost \$16.00 per hour, and I will be billed for that time. In addition, I understand that I can have documents copied at that time. I will call you to confirm that I will be able to review these files on that date.

Thank you for your cooperation.

Very truly yours,

Jolynn M. Pollard
Jolynn M. Pollard

JMP/ehe

cc: Martin T. Lee, Esq. (i/o)

S1160.074\LT004349.LAO

Amir, Jolynn came in 2/23/95. She looked at 301, 401, 411 High St. We have files for 3675 Alameda and 768 46th Ave. But they're not in file rooms & there's not an OUT card. We still need to call her if we find files.

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION
DEPOSIT / REFUND ACCOUNT SHEET

printed 12/06/94

SITE INFORMATION

Lerner Co., The
3675 Alameda Ave
Oakland 94601
Site Contact:
Site Phone :

StID: 5364	Site#: 164
PROJECT#: 164A	
PROJECT TYPE: R	
INSP: Cynthia Chapman	
ACCT. SHEET PG #:	

PROPERTY OWNER INFORMATION

Owner Contact:
Owner Phone :

PAYOR INFORMATION

R W Johnston & Son
802 53rd Ave
Oakland CA 94601 # 71
Payor Contact: Stephen B Johnston
Payor Phone : 415-261-9424

Date	Action Taken	Time		Hours Spent/Depstd	Hour Balnce	Money Spent/Depositd	Money Balance
		In	Out				
	Balance from Prev. Page	
	Rcpt# 505664						
04/26/88	Deposit of \$300.00 @ \$90/hour			+3.33			
4/26/88	initial plan review @ 53			1 hr.			
6/27/88	on site tank removal @ 53			2 hrs.			
7/27/88	removal closure report @ 53			1 hr.			
12/6/89	admin close out @ 70			0.5 hr.			
	zero balance						the account is close

UPON COMPLETION OF PROJECT

PROJ COMPLETED BY : Donna Seaver ATTACH: State Forms A, B & C
 Billing Adjustment*
DATE OF COMPLETION : 12/6/89 DATE SENT TO BILLING: _____
TOTAL COST OF PROJECT: _____ REFUND AMOUNT: _____ Rev. 1/93

* Billing adjustment forms needed when site is in our UST program.

Laboratory analysis of Soil Sample S-1 detected 86.0 milligrams per kilogram (mg/kg) TPH as gasoline, 1.0 mg/kg toluene, 1.7 mg/kg xylene and 1.0 mg/kg ethylbenzene. Laboratory analysis of Soil Sample S-2 detected 616.0 mg/kg TPH as gasoline, 0.35 mg/kg benzene, 1.6 mg/kg toluene, 153 mg/kg xylenes and 23 mg/kg ethylbenzene.

The chain of custody record and laboratory analytical results are presented with this report.

If you have any questions, please do not hesitate to contact us.

Sincerely,

SAFETY SPECIALISTS, INC.

Paul King

Paul King
Hydrogeologist
Environmental Engineering Services

PK:mt

Enclosures



JOHN B. HOOK
RONALD E. MALLEN*
HOWARD M. GARFIELD
JOSEPH P. McMONIGLE
DONALD W. CARLSON
DAVID W. EVANS
MARSHA L. MORROW
BARRY D. BROWN
MICHAEL L. BOLI
JOHN E. PEER
LAWRENCE A. CALLAGHAN
RUSSELL S. ROECA
GUY D. CALLADINE
ROBERT M. PETERSON
WENDY M. LAZERSON
EDWARD F. DONOHUE, III
DEBRA L. MELLINKOFF
MARK SIMON KANNETT
MICHAEL F. HARDIMAN

*A PROFESSIONAL
CORPORATION

IRENE K. GREENBERG
DON A. LESSER
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ROBERT C. CHILES
ESTHER Z. HIRSH
KEVIN P. KAMRACZEWSKI
CHRISTOPHER T. BORGESON
LINDA LANDRY MILLER
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DAVID IAN DALBY
JOYCE C. WANG

EDWARD D. HAAS
OF COUNSEL
DEBRA A. BAKER
SPECIAL COUNSEL
LINDA S. VOTAW
SENIOR COUNSEL

BERT W. LEVIT (1903-1980)
PERCY V. LONG (1870-1933)

LONG & LEVIT

A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

633 WEST FIFTH STREET, SUITE 5900
LOS ANGELES, CALIFORNIA 90071
TELEPHONE: (213) 356-5900
FACSIMILE: (213) 613-0664

101 CALIFORNIA STREET, SUITE 2300
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE: (415) 397-2222
FACSIMILE: (415) 397-6392

IRA D. GOLDBERG
JEFFREY D. LIVINGSTON
JULIET A. LEFTWICH
MICHAEL A. VASQUEZ
BARRY K. TAGAWA
MARK L. NISSENBAUM
ANNE E. KUNZIG
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CORY M. MARTIN
DEBBIE L. LEE
SCOTT W. BATES
PAUL S. COHEN
GLORIA S. HA
SCOTT J. HYMAN
DAVID P. OSAKO
WAYNE K. SNODGRASS
ANN L. STRAYER
DOW W. PATTEN
STERRETT J. BRANDT
KATHLEEN M. EWINS
ALEXIA JONES-MARTIN
LAUREN O'BRIEN
WILLIAM E. WADDELL
DARIO J. FROMMER
DOUGLAS J. MELTON
STEVEN D. STRAUSS

June 10, 1994

S1160.228

California Regional Water
Quality Control Board
San Francisco Bay Region
2101 Webster St., Suite 500
Oakland, CA 94612

CALIFORNIA REGIONAL WATER

JUN 13 1994

QUALITY CONTROL BOARD

Re: PRP: The Learner Company
Site: 3675 Alameda Ave., Oakland, CA
Claim: 13-342221
Your File: 2199,9217 (TR6)

Dear Sir or Madam:

Enclosed is the April 7, 1993 letter referenced in (and inadvertently omitted from) our letter to you of June 9, 1994.

Very truly yours,

Eva Huwe Ellis

Eva Huwe Ellis
Secretary to
JoLynn M. Klein

/ehe
Enclosure

S1160.228\LT001LAO.LAO

STATE WATER RESOURCES CONTROL BOARD**DIVISION OF CLEAN WATER PROGRAMS**

2014 T STREET, SUITE 130

P.O. BOX 944212

SACRAMENTO, CA 94244-2122



93 SEP 17 PM 3:22

(916) 227-4411
 (916) 227-4349 (FAX)

SEP 16 1993

County of Alameda
 Mr. Ed Howell
 Department of Environmental Health
 80 Swan Way, Room 200
 Oakland, CA 94621

Dear Mr. Howell:

FUNDS

This is to notify you of your state and federal funds spent from
 July 1, 1992 through June 30, 1993.

<u>State Funds</u>	<u>Federal Funds</u>	<u>Total Spent</u>
\$457,344.00	\$303,048.00	\$760,392.00
73,777.54	81,211.49	154,989.03
97,737.93	114,597.29	212,335.22
14.00	206.23	220.23
92,352.48	107,010.15	199,362.63
176,492.07	22.04	176,514.11
<u>\$ 16,969.98</u>	<u>\$.80</u>	<u>\$ 16,970.78</u>

Please notify Sandy Gill at (916) 227-4411 if you have any questions.

Sincerely,

Sandy Gill
 Underground Storage Tank Program

Kevin Graves

Records Organize Go To Exit
SITENAME LEARNER COMPANY CASENO.# RBFILENO 01-0894
STREETNO 3675 STREET ALAMEDA AVE HOW DISCOVERED TC
CITY OAKLAND ZIP DISCVRDATE 09/13/88
COUNTY 01 LOCALAGENCY 01000 MOPNO HOWSTOPPED CT STOPDATE 09/13/88
PRIORITY X: XXXXX Y:XXXXX LAT:XXXXX LON:XXXXX LEAKSOURCE T LEAKCAUSE F

ENTERDATE 00/00/00 REVIEWDATE 09/12/94 CORRDATE 07/19/88 RPTDATE 09/13/88
UPDATE REVSTAT C STAFF KLG FUNDING F NO.WELLS: PILOTPRPGM Y

PRIM SUB 12032 SEC SUB MAXSOIL 7 MAXGW 0
MAXBENZENE 0 BENZENE 0 GWDEPTH CASETYPE S STATUS 0

DATE 1 00/00/00 DATE3A 00/00/00 DATE3B 00/00/00 DATE5C 00/00/00
DATE5R 00/00/00 DATE 7 00/00/00 DATE 8 00/00/00 DATE 9 00/00/00

INTERIM N INTERIMDATE 00/00/00 ABATEMETHOD NT LEADAGENCY L

CASELIST FUEL ENFORCETYPE 0 ENFORCEDATE 00/00/00 RPSEARCH

COMMENT SENT FILE TO ACHD 9/94

Edit D:\fuels\FUELDB Rec 992/2133 File NumCaps

*Case is closed as tank case
still active as SLIC case
162 w/ Rodheller logan
Tom*

Records Organize Go To Exit

SITENAME LEARNER CASENO.# RBFILENO 01-0893
STREETNO 768 STREET 46TH AVE HOW DISCOVERED TC
CITY OAKLAND ZIP DISCVRDATE 07/20/88
COUNTY 01 LOCALAGENCY 01000 MOPNO HOWSTOPPED CT STOPDATE 07/20/88
PRIORITY X: XXXXX Y: XXXXX LAT: XXXXX LON: XXXXX LEAKSOURCE T LEAKCAUSE F

ENTERDATE 00/00/00 REVIEWDATE 09/08/94 CORRDATE 07/20/88 RPTDATE 07/20/88
UPDATE REVSTAT C STAFF KLG FUNDING F NO.WELLS: PILOTPRPGM Y

PRIM SUB 12036 SEC SUB 8006619 MAXSOIL 0 MAXGW 0
MAXBENZENE 0 BENZENE 0 GWDEPTH CASETYPE S STATUS 0

DATE 1 00/00/00 DATE3A 00/00/00 DATE3B 00/00/00 DATE5C 00/00/00
DATE5R 00/00/00 DATE 7 00/00/00 DATE 8 00/00/00 DATE 9 00/00/00

INTERIM N INTERIMDATE 00/00/00 ABATEMETHOD NT LEADAGENCY L

CASELIST FUEL ENFORCETYPE ENFORCEDATE 00/00/00 RPSEARCH

COMMENT SENT FILE TO ACHD 9/94

Edit CD:\fuels\FUELDB Rec 993/2137 File NumCaps

site # 162

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION
DEPOSIT / REFUND ACCOUNT SHEET

SITE INFORMATION

Lerner Co., The
768 - 46th Ave.
Oakland 94601
Site Contact:
Site Phone :

StID: 3705 Site#: 162
PROJECT#: 162A
PROJECT TYPE: R
INSP: Chris Carpenter
ACCT. SHEET PG #: _____

PROPERTY OWNER INFORMATION

Owner Contact: *TALK HECHT*
Owner Phone : *Lerner Investments*
2711 Navy drive, 10

CONTRACTOR INFORMATION

Consultant
~~R W Johnston & Son~~ - *Robert Revere*
801 - 53rd Ave.
Oakland CA 94601 # 71
Contr. Contact: Stephen B. Johnston
Contr. Phone : 415/261-9424
Wear Associates

Date	Action Taken	Time		Hours	Hour	Money	Money
		In	Out	Spent/ Depstd	Balnce	Spent/ Depositd	Balance
	Balance from Prev. Page						-231.35
04/26/88	Rcpt# U505662 Deposit of \$300.00 @ \$75/hour					+4.	
5/10/93	review telcon Bob DeVaney	9:30	10:30		1.0	75.00	-306.35
5/13/93	review SSP				0.25	18.75	-325.10
5/17/93	Site visit met Bob DeVaney	11:00	12:30		1.5	112.50	-437.60
7-19-93	2 billing						

UPON COMPLETION OF PROJECT

PROJ COMPLETED BY : _____ ATTACH: State Forms A, B & C
 Billing Adjustment*

DATE OF COMPLETION : _____ DATE SENT TO BILLING: _____

TOTAL COST OF PROJECT: _____ REFUND AMOUNT: _____ Rev. 1/93

* Billing adjustment forms needed when site is in our UST program.

PROJECT # 4505662
162A

ALAMEDA COUNTY HEALTH
ENVIRONMENTAL HEALTH DEPT.

SERVICE REQUESTED: Removal

NAME OF SITE: Lerner STID _____

ADDRESS: 768-46th Ave

OAKLAND, CA 94601

CONTRACTOR: R.W. Johnson & Son

ADDRESS: 801-53rd Ave. Oak TELE = 261-9424

CONTACT PERSON: G.W. Johnson TELE = 261-9424

AMOUNT OF DEPOSIT: \$ 300.00 DATE: 4/27/88

DATE: ACTION TAKEN TIME HRS IN 0.1 X \$53.00 =
IN OUT X \$53. BALANCE

~~OVERHEAD 25%~~ \$ _____

4/12 PLAN REVIEW 7:35 8:35 1.0 53 _____

5/24 SITE REVIEW 8:30 10:30 2.0 106 _____

300.00

11/15/91 File Review 15:00 17:00 2.0 134.00 166.00

~~1/25/92~~ ~~Transfer to log~~ _____

2/25/92 Transfer to log 2:30 4:00 1.5 106.50 59.50

TOTAL COST \$ _____

PROJECT COMPLETED BY _____

DATE: _____ REFUND: \$ _____

SENT TO ACCOUNTING: DATE: _____

TO BE REPORTED WEEKLY TO ACCOUNTING FOR CASH FLOW
ADJUSTMENT

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION
DEPOSIT / REFUND ACCOUNT SHEET

SITE INFORMATION

erner Co., The
768 - 46th Ave.
Oakland 94601
Site Contact:
Site Phone :

SITE#: 162
PROJECT#: 162A
PROJECT TYPE: R
INSP: Cynthia Chapman
ACCT. SHEET PG #: _____

PROPERTY OWNER INFORMATION

Owner Contact:
Owner Phone :

CONTRACTOR INFORMATION

R W Johnston & Son
801 - 53rd Ave.
Oakland CA 94601 # 71
Contr. Contact:
Contr. Phone :

Date	Action Taken	Time In	Time Out	Hours Spent/Depstd	Hour Balnce	Money Spent/Depositd	Money Balance
	Balance from Prev. Page
04/19/88	Rcpt# U505662 Deposit of \$300.00 @ \$67/hour			+4.47			
3/4/92	Review case	3:30	4:00	0.5		35.50	264.50
4/20/92	Transfer to David Smith	7:20	7:25	0.25		17.75	246.75
8/24/92	review case	9:00	12:00	3.0		203.50	33.25
8/31/92	letter	9:25	12:25	3.0		203.50	179.25
9/11/92	tel con David Osofko	3:00	3:15	0.25		17.75	161.50
-10-23-92 2 billing							
12/9/92	tel con ^{weiss} Everett Severson (note to file)	1:45	2:00	0.25		17.75	143.75
1-20-93 2 billing							
3/15/93	review with letter			2.0		150.00	-6.25
3/22/93	letter to J. Hecht			1.5		112.50	-118.75
4/6/93	letter to J. Hecht			1.5		112.50	-231.25
5-7-93 2 billing							

PROJECT COMPLETED BY : _____

DATE OF COMPLETION : _____ DATE SENT TO BILLING: _____

TOTAL COST OF PROJECT: _____ REFUND AMOUNT: _____ Rev. 4/91

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

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

April 7, 1993

Mr. Jack Hecht
Learner Investment Company
2711 Navy Dr.
Stockton, CA 95206

(209) 948 3498

**Re: Site remediation at Learner Property, 768 46th Avenue,
Oakland, CA 94601**

Dear Mr. Hecht:

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed the Investigation Workplan, dated February 16, 1993, prepared by Weiss and Associates. The workplan specifies the installation of eight soil borings, four to be placed around the former bailing area and four in the drive area. Additionally, three monitoring wells are to be installed. The workplan states that the locations of these wells will be based upon the results of grab groundwater sampling results.

The workplan is approved with the following modifications and inclusions:

1) When determining the placement of wells rather than considering grab water data, you are required to consider all previous soil contamination data. Data to be considered are particularly those where levels exceed the allowable California Code of Regulations, Title 22 total threshold limit concentration (ttlc) and the soluble limit threshold concentrations (stlc). Both ttlc and stlc levels were exceeded in B-11 and B-12 (see Kleinfelder data in Weiss report, August 21, 1991) indicating 5230 and 83.5 ppm of lead and 8180 and 379 ppm of zinc in B-11 and 1210 and 102 ppm of lead and 2090 and 240 of zinc in B-12.

Values obtained during the ttlc test in borings B-3, B-10, B-11, B-12 were exceeded for Cd, Cr and Ni. Analytical data obtained in B-8 and B-9 were exceeded for Cr. Results from all previously collected borings (B-1 - B12) contained levels of lead which exceeded ten times the CCR title 22 allowable stlc value.

Based upon the Tri-Regional Guidelines, August 12, 1990 when petroleum hydrocarbon contamination exceeds 100 ppm in soil, groundwater monitoring wells are required within 10 feet in the confirmed down gradient direction.

Mr Hecht
April 7, 1993
page 2 of 2

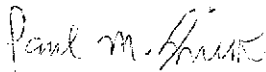
2) The workplan does not discuss the size of the wells, the initiation and duration of quarterly sampling and the type of water analyses to be performed. You are requested to have your consultant provide this information to this office.

3) Please have your consultant notify this office in advance of this next phase of scheduled work at the site.

4) Please have your consultant provide this office with a copy of the health and safety plan for the work to be performed at the site. The safety plan should include but not be limited to the name of the site safety officer, personal protective equipment, monitoring equipment, site security measures and name and address of the medical facility used in the event of an emergency.

If you have any questions please direct them to me at (510) 271-4320.

Sincerely,



Paul M. Smith
Senior Hazardous Materials Specialist

cc:

Everett Sorenson, Weiss Associates, 5500 Shellmound St.,
Emeryville, CA 94608
David Sadwick, Cadwalader, Wickersham and Taft, 660 S.
Figueroa St., Los Angeles, CA 90017
Rich Hiett, SFRWQCB, 2101 Webster St., Fifth Floor, Oakland,
CA 94612

CNA INSURANCE COMPANIES

CNA Plaza, Chicago, Illinois 60685

California Regional Water
Quality Control Board
San Francisco Bay Region
1111 Jackson St Room 6040
Oakland CA 94607

April 7, 1993

Insured: The Learner Co.
Site: 3675 Alameda Avenue, Oakland, California
File: 13-342221
Your File: 2199,9217 (TR6)

FREEDOM OF INFORMATION ACT REQUEST

Pursuant to the Freedom of Information Act ("FOIA"), 5. U.S.C. 552, we request copies of all documents concerning Learner Co.'s involvement at the 3675 Alameda Avenue Site. Specifically, we request copies of the following:

1. Any and all information request letters relating to this site sent to Learner Co. pursuant to Section 104 of the Comprehensive Response, Compensation & Liability Act, 42 U.S.C. 9604 and/or Section 3007 of the Resource, Conservation & Recovery Act 42 U.S.C. 6927.
2. Any and all documents submitted to the Board by Learner Co. in response to the information request letters identified in Item One above.
3. All correspondence from the Board to Learner Co. including, without limitation, notice letters informing the PRPs of the potential liability for cleanup and/or informing the PRPs of the opportunity to conduct or participate in the development of the Remedial Investigation/Feasibility Study ("RI/FS").
4. A list of all PRPs identified in connection with this site.
5. All documentation relating to the type of volume of hazardous substances and/or hazardous wastes involved which are related to Learner Co.
6. All documents relating to any Administrative Orders issued or Consent Decrees agreed upon.
7. All documents reflecting, relating, or referring to negotiations and/or agreements with the Board.
8. All documents reflecting, relating, or referring to the estimated or actual cost of any removal and/or remedial action taken or planned.



For All the Commitments You Make®

April 7, 1993

9. All documents relating to the insurance coverage of Learner Co.
10. Any and all RI/FS pertaining to the site.
11. Any and all RODs pertaining to the site.
12. Any and all news releases pertaining to the site.
13. Any and all site inspection reports pertaining to the site.

For purposes of this request, the term "document" includes, without limitation, all correspondence, memoranda, inter- and intra- department communications, minutes, reports, notes, schedules, analyses, photographs, contracts, proposals, and all other such documents tangible or retrievable of any kind.

As provided under the FOIA, we expect to receive a reply within ten (10) working days. In the event that determination is made that some or all of the documents requested are exempt from disclosure under the FOIA, please identify those documents withheld and the basis for the Board's exemption in each instance.

Finally, please provide a copy of all non-exempt material to the extent that it is reasonably segregable from the material claimed by the Board to be exempt from disclosure.

In order to expedite this request, please bill or notify us as soon as possible regarding the cost of duplicating these documents. Should you need additional information in order to process this request, please do not hesitate to contact the undersigned. **PLEASE USE OUR FILE NUMBER ON ALL FUTURE CORRESPONDENCE.**

Sincerely,

Kay Perry
Claim Analyst
Centralized Environmental Claims - 16W
(312) 822-7322

LCL129/87121125.D3M/122195

Alameda County Department of Environmental Health
Hazardous Materials Division

80 Swan Way, Rm. 200, Oakland, CA 94621
Ph: 510-271-4320

BILLING FOR SERVICES

STID# _____

A. Site Name The Lerner Company Phone _____
Site Address 768 46th Ave Oakland 94601
(If no address, description of area) Number Street City Zip
Prior Business Name _____ Prior Owner's Name _____

B. Service Requestor David Osaiko Long + Levitt Phone _____
Contact Person Company Name
Billing Address 101 California Street, Suite 2300, San Francisco, CA 94111
Number Street City Zip

Category of Service	
<input checked="" type="checkbox"/> Site Search	#Hours <u>1.5</u> x \$ <u>71</u> /Hr \$ <u>106.50</u> (Whole Hours Only)
<input type="checkbox"/> File Search	#Copies _____ x \$ _____ /Copy \$ _____
<input type="checkbox"/> Other _____	_____ x \$ _____ \$ _____
	Other _____ \$ _____
	TOTAL CHARGE: \$ _____

REMARKS: _____
Site search for the above address
2:45 - 4:05 1.5 hrs

You will receive an invoice in accordance with Article 11 of Chapter 6, Title 3 of the Ordinance Code of Alameda County

Service Requestor Jay Brignon / Lone Star Legal Services Jay Brignon Date 7/17/92
printed name status
HazMat Specialist Paul M. Smith Paul M. Smith Date 7/17/92
printed name signature

JOHN B. HOOK
RONALD E. MALLEN*
HOWARD M. GARFIELD
JOSEPH P. McMONIGLE
DONALD W. CARLSON
DAVID W. EVANS
MARSHA L. MORROW
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LINDA LANDRY MILLER
RANDALL A. MILLER

EDWARD D. HAAS
OF COUNSEL
DEBRA A. BAKER
SPECIAL COUNSEL

BERT W. LEVIT (1903-1980)
PERCY V. LONG (1870-1953)

LONG & LEVIT

A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

101 CALIFORNIA STREET, SUITE 2300
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE: (415) 397-2222
FACSIMILE: (415) 397-6392

355 SOUTH GRAND AVENUE, SUITE 3288
LOS ANGELES, CALIFORNIA 90071
TELEPHONE: (213) 356-5900
FACSIMILE: (213) 613-0664

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ELIZABETH COLPOYS
JEFFREY D. LIVINGSTON
LINDA S. VOTAW
DAVID IAN DALBY
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BARBARA W. ENGLER
CLAIRE L. CORTNER
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ROBERT J. ROMERO
ELIZABETH M. LINK
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GLORIA S. HA
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ANN L. STRAYER
STERRETT J. BRANDT
KATHLEEN M. EWINS
ALEXIA JONES-MARTIN
LAUREN O'BRIEN
WILLIAM E. WADDELL
JOSEPH ZUBER

September 11, 1992

S1160.974

Paul Smith
Alameda County Environmental Health Dept.
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621

Re: Public Records Act Request
PRP: **The Learner Corporation**
(Hugo Neu & Sons)
Site: 768 46th Ave., Oakland, and
(3675 Alameda Ave., Oakland?) 94601

Dear Mr. Smith:

When we spoke by telephone on July 22, you suggested I give you more time before requesting copies of your files, which you estimated to be about 2 1/4 inches thick. We now submit our request.

Under the provisions of California Government Code § 6250 et seq., we request complete copies of your files **relating to the the Notices of Violation** your agency has issued to Learner Co. concerning the 768 46th Ave. site. We believe your records may go back to early 1988, or before. We request copies of all relevant documents, correspondence, memoranda and reports in your files.

In our call, you also made reference to a 3675 Alameda Ave. site, but were uncertain at that time about the nature of your agency's involvement at this site. If there is has been any recent agency activity relating to this site after 1990, or if your files on this site are less than one inch thick, we would also request copies of your related files. Otherwise, we do not request file copies at this time.

Paul Smith
September 11, 1992
Page 2.

Please contact me as soon as possible with information concerning what materials your office will produce for copying. If any part of this request is denied, kindly provide the specific exemptions upon which your denial is based. Once we hear from you, we will have a representative from NightRider Copy Service contact you to make arrangements to have the copying done in your office.

If you have any questions, do not hesitate to call.

Very truly yours,



David P. Osako

S1160.974\LT001378.378



LONE STAR
LEGAL SERVICES

COURT RESEARCH
ON SITE COPYING
ON SITE MICROFILMING
SERVICE OF PROCESS
INVESTIGATIVE RESEARCH

JAY BRIGNON
P.O. Box 2262
MILL VALLEY, CA
94942
(415) 389-1464
PAGER 708-1685

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

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

September 1, 1992

Mr. Jack Hecht
Learner Investment Company
2711 Navy Dr.
Stockton, CA 95206

**Re: Site remediation at Learner Property, 768 46th Avenue,
Oakland, CA 94601**

Dear Mr. Hecht:

Alameda County Environmental Health Department, Hazardous Materials Division has received and reviewed the Remedial Action Workplan, dated August 21, 1992, prepared by Weiss Associates.

The work plan documents contamination in three main areas of the above property which include: the access drive, the former bailing area and the soil piles. Contaminants detected at the site include Total Petroleum Hydrocarbons (TPH) as high as 28,000 ppm, polychlorinated bi-phenyls as high as 25.2 ppm, cadmium contamination as high as 43 ppm, chromium contamination as high as 218 ppm, lead as high as 5150 ppm, nickel as high as 698 ppm and zinc as high as 8820 ppm.

The work plan proposes in situ soil stabilization and capping of the above materials. Before an adequate evaluation of whether this proposed methodology will be effective the following information must first be provided to this office:

In order to properly characterize soil contamination you are required to use the waste extraction test (WET) to determine the soluble threshold limit concentration (stlc) in the soil for each area where highest levels for Cd, Cr, Pb, Ni and Zn were detected.

The preparation of a work plan defining the lateral and vertical extent of soil contamination for each pollutant is needed. Additionally, the installation of groundwater monitoring wells are necessary to determine whether impacts to groundwater have occurred. You are required to submit a work plan to this office addressing the definition of soil contamination and implementing a ground water investigation. In addition to the above items the work plan should include a site safety plan prepared by the consultant/contractor performing the work at the site, a listing of the analytes sought in soil and groundwater, a description of the quality assurance quality control measures for laboratory

Mr. Jack Hect
September 1, 1992
page 2 of 2

samples and a time schedule for the completion of the next phase of work.

Once the extent of the contamination from each of the pollutants has been ascertained an adequate assessment of offsite vs onsite disposal can then be determined.

If the in situ option is selected, an in depth study addressing the likelihood that the contamination (either currently or in the future) will impact groundwater is necessary. This Agency will seek concurrence from the San Francisco Regional Water Quality Control Board (SFRWQCB) prior to approval of this alternative.

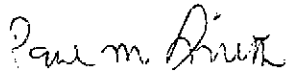
You should be aware that onsite disposal of hazardous waste [material exceeding the total threshold limit concentration (ttlc)] may require a variance or another special requirement, issued by the California EPA, Department of Toxic Substances Control (DTSC) Division. You are directed to contact the DTSC regarding this matter.

You should also be aware that if hazardous waste levels are left onsite additional long term ground water monitoring may be required.

You are required to submit a work plan outlining the proposed measures to delineate the extent of contamination and also specifying the locations of ground water monitoring wells within 45 days of the receipt of this letter.

If you have any questions please direct them to me at (510) 271-4320.

Sincerely,



Paul M. Smith
Senior Hazardous Materials Specialist

cc:

Everett Sorenson, Weiss Associates, 5500 Shellmound St.,
Emeryville, CA 94608
David Sadwick, Cadwalader, Wickersham and Taft, 660 S.
Figueroa St., Los Angeles, CA 90017
Gil Jensen, Alameda County District Attorney's Office, 7677
Oakport St, Suite 400, Oakland, CA 94621
Rich Hiett, SFRWQCB, 2101 Webster St., Fifth Floor, Oakland,
CA 94612
Barbara Cook, CalEPA, DTSC Reg. 2, 700 Heinz Ave., Suite 200,
Berkeley, CA 94710-2737

HELLER, EHRMAN, WHITE & MCAULIFFE

ATTORNEYS

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

525 UNIVERSITY AVENUE
PALO ALTO, CALIFORNIA 94301-1908
FACSIMILE (415) 324-0638
TELEPHONE (415) 326-7600

333 BUSH STREET · SAN FRANCISCO, CALIFORNIA 94104-2878
CABLE HELPOW · TELEX 184-996 · FACSIMILE (415) 772-6268
TELEPHONE (415) 772-6000

701 FIFTH AVENUE
SEATTLE, WASHINGTON 98104-7098
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TELEPHONE (206) 447-0900

555 SOUTH FLOWER STREET
LOS ANGELES, CALIFORNIA 90071-2306
FACSIMILE (213) 614-1868
TELEPHONE (213) 689-0200

June 19, 1989

1300 S. W. FIFTH AVENUE
PORTLAND, OREGON 97201-5698
FACSIMILE (503) 241-0950
TELEPHONE (503) 227-7400

WRITER'S DIRECT DIAL NUMBER

(415) 772-6034

6/22/89

15105-0001

ALAMEDA COUNTY
DEPT. OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS

HAND DELIVERY

Mr. Rafat Shahid, Chief
Hazardous Materials Program
Alameda County Department of
Environmental Health
80 Swan Way, Room 200
Oakland, California 94621

Re: The Learner Company (768 - 46th Ave., Oakland)

Dear Mr. Shahid:

Enclosed for your information is a revised work plan for soil assessment at the property described above. The Learner Company expects that the work will begin early this week. If you have any comments or suggestions, I would appreciate receiving them as soon as possible.

We anticipate that work at the site will proceed in phases. The enclosed work plan represents the first phase. In brief, soil samples will be taken and analyzed pursuant to the criteria of the Department of Health Services for hazardous waste. As you requested, the twelve samples will be analyzed individually, and not as six composites. If the samples appear to meet the criteria for hazardous waste, further samples will be subjected to bench tests for three potential remedial alternatives. As described in the enclosed work plan, those bench tests are stabilization, chemical oxidation and biodegradation.

We appreciate your comments on the site contained in your March 24, 1989 letter to Roger Carrick of our office. We would like to address two of the points made in your letter. We will respond to the remainder of your letter at an appropriate time in the future.

Mr. Rafat Shahid
June 19, 1989

Page 2

First, your letter suggests making an oral LD 50 analysis of the soils at the site. We have discussed this suggestion with Kleinfelder, Learner's consultants, and have concluded that such an analysis is infeasible and unnecessary. As noted in the enclosed work plan, LD 50 concentrations and calculations are available only for specific individual constituents. (Page 3). The hydraulic fluid present in some of the soil on the site potentially is composed of numerous individual constituents. An LD 50 analysis would require testing and calculations for each of those constituents, a substantial task. We believe that the corrosivity, reactivity, ignitability, and aquatic toxicity tests that will be performed on the samples will be sufficient to determine whether or not the soils are hazardous under DHS's regulations.

Second, we believe that it is premature to commence any investigation of groundwater. There is no evidence that any groundwater contamination exists at the site. All results to date show only a potential concern regarding soil. Depending upon the results of the work described in the enclosed work plan, a later phase of work at the site may involve excavation to an appropriate depth. If this approach is taken, samples of remaining soils could be used to confirm that substances of concern are at sufficiently low levels. If no groundwater is encountered, then it may not be necessary to conduct any groundwater sampling.

If you have any comments or suggestions on the enclosed work plan, please feel free to call either myself at (415) 772-6034, or Roger Carrick in our Los Angeles office at (213) 689-7507.

Very truly yours,



Edwin Oyarzo

Enclosure

cc: w/encl.
Ariu Levi-by hand

ALAMEDA COUNTY
HEALTH CARE SERVICES

DAVID J. KEARS, AGENCY
CARE N. LESTER, Agency Director



Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

March 24, 1989

XXXXXXXXXXXXXXXXXXXX

XXXXXXXXXXXXXXXXXXXX

XXXXXXXXXXXXXXXXXXXX

(415) 271-4320

Mr. Roger Carrick
Heller, Ehrman, White & McAuliffe
Suite 1230
515 South Figueroa Street
Los Angeles, CA 90071-3301

Re: Learner Company at 768 46th Ave. in Oakland

Dear Mr. Carrick:

It is apparent from your letter to this office dated December 12, 1988, that Learner Company questions the need for remediation at 768 46th Ave. in Oakland. This position, though clearly not supported by the results of soils analysis as performed by the environmental consulting firm of Dames and Moore, appears to be based on the assumption that 22 CCR and CHSC are unclear on the status of waste hydraulic oil as hazardous waste. Several of your points in support of this position merit discussion.

As indicated in your letter, by your evaluation of California hazardous waste control laws there is a degree of ambiguity concerning whether waste hydraulic fluid should be considered waste slop oil. Since industrial hydraulic fluid consists of paraffinic and cycloparaffinic petroleum fractions, there is little question in this office's opinion that waste hydraulic fluid is waste slop oil. To further this opinion consider that slop oil is a generic phrase for petroleum wastes in the molecular weight range of oils and grease. Also, proper testing for quantifying waste with spent hydraulic fluid is the same as would be used for other types of waste oil, i.e., DHS (TPH; GC-FID), EPA (TOG; 3550 & 503E)

Further, fundamental definitions of what constitutes a hazardous waste, as set forth under Articles 9 and 11 of 22CCR, and the applicability of such criteria as cited under Article 2, need to be reviewed. Pursuant to 22CCR, Section 66300 (a) (1), any waste determined to be hazardous according to any criterion in Article 11 and consists of or contains a material cited under Article 9 shall be handled as a hazardous waste. Section 66305 (a) (1) further requires that a waste must be classified a hazardous waste if it is within the scope of Section 66300 and is hazardous pursuant to any criterion of Article 11.

Learner Facility
March 24, 1989
Page 2

As you also discussed, criteria with which petroleum hydrocarbon contamination in soil is assessed, in terms of waste classification, is not strictly based upon language set forth in 22CCR. The State Department of Health Services, though, by executive memorandum, determined that a total petroleum hydrocarbon concentration of 1,000 ppm in soil constituted a hazardous waste. This determination is based upon ignitability characteristics of gasoline in sandy soil. Waste with TPH concentrations at or above the 1,000 ppm threshold, then, are to be handled as hazardous waste, until proven to be otherwise.

The Regional Water Quality Control Board, San Francisco Bay Region, as the agency responsible for the licensing of certain solid waste disposal facilities and delegated by the State to ensure the integrity of surface and subsurface water resources in this region, has further included with DHS's waste classification any materials contaminated with total oil and grease in like concentrations. As such, any contaminated material exhibiting TPH or TOG concentrations at or above 1,000 ppm must be excavated. This material may then be transported off-site, by a DHS-licensed hazardous waste hauler under manifest to a Class I landfill. Alternatives to Class I disposal, as discussed in an earlier letter to you, exist and their use should be considered.

Concerning Learner Facility's desire to declassify their waste as "nonhazardous", several considerations have been overlooked. Pursuant to 22CCR, Section 66305 (a) it is the waste producers responsibility to determine if a waste is a hazardous waste. This evaluation entails the implementation of all applicable, or potentially applicable, criteria cited under Article 11. Specifically, by the details of your letter and the supporting report, the toxicity criteria will be grossly under evaluated.

You propose, in part, to declassify as nonhazardous, waste from the Learner Facility through the use of 22CCR, Section 66696 (a) (4); the acute aquatic 96 hour bioassay criteria. Use of this method on a waste which contains compounds that exhibit little solubility in water is questionable, and the results inconclusive. Generally speaking, petroleum hydrocarbons are hydrophobic compounds and, as such, are not completely miscible in water. Therefore, it would not be expected that sufficient stress would be placed upon the test subjects to cause excessive, if any, mortalities during the course of the analysis. Due to the inherently poor solubility of petroleum hydrocarbons in water, a more conclusive acute toxicity analysis may be through implementation of the oral LD50 criterion.

Learner Facility
March 24, 1989
Page 3

However, acute toxicity does not stand alone as the only criteria by which a waste may be determined to be toxic and, hence, hazardous. Under Section 66696 (a) (6) of Article 11, a waste or material is toxic or hazardous if it "... (h) as been shown through experience or testing to pose a hazard to human health or environment because of its carcinogenicity, acute toxicity, chronic toxicity, bioaccumulative properties, or persistence in the environment..." The key to satisfying the requirements of Section 66305 (b), which by reference requires the waste producer to determine whether a waste is hazardous pursuant to any criterion of Article 11, can be found in the language of Section 66696 (a) (6).

Since your goal appears to be declassification, one possible recourse to handling this waste material as hazardous waste is provided under 22CCR, Section 66305 (e). Pursuant to this section, a waste producer may apply to the DHS to handle such waste as "nonhazardous" because of mitigating physical or chemical properties which reduce the risk to human health or the environment to insignificant levels. An application for approval must be approved in writing by the DHS, or designee, before said waste may be declassified.

Last, the lack of empirical evidence of ground water contamination at the Learner Facility should not be considered sufficient to dismiss the need for further evaluation of the subsurface waters. Undoubtedly you will agree, the possibility exists that the soil investigation conducted to date at this facility may not have fully evaluated the soil profile, or have fully evaluated the extent of vertical soil contamination to the point that it can be stated that ground water contamination did not occur. Since ground water in the bay region has been classed "potential beneficial use" by the Water Quality Control Board, and the possibility exists that soil contamination at this facility may have impacted the ground water, the ongoing site clean up should include a technical review of this area. The following documentation will be required to support the resulting position:

Plan for determining ground water contamination

- Construction and placement of wells should adhere to the requirements of the Regional Water Quality Control Board.
- Provide a description of placement and rationale for the location of monitoring wells including a map to scale.

- A. Drilling method for the construction of monitoring wells
- expected depth and diameter of monitoring wells
 - date of expected drilling
 - casing type, diameter, screen interval, and pack and slot sizing techniques
 - depth and type of seal
 - development method and criteria for adequacy of development
 - plans for cuttings and development water
- B. Ground water sampling plan
- method for free product measurement, observation of sheen
 - well purging procedures
 - sample collection procedures
 - chain of custody procedures

This position was discussed with Lisa McCann of the RWQCB, during an office conference on February 7, 1989. Ms. McCann agreed that ground water at this facility must be evaluated for the possibility of contamination, and the above noted documentation would also be required by her office to evaluate the clean up at this facility.

Pursuant to California Water Code, Section 13267 (a), a regional board may investigate the quality of any waters of the state within it's region. Further, Section 13267 (b), states, in conducting an investigation specified in subdivision (a), the regional board may require that any person discharging waste within it's region shall furnish, under penalty of perjury, those technical or monitoring program reports as the board may specify.

Learner Facility
March 24, 1989
Page 5

Please be advised that the Alameda County District Attorneys' Office, Consumer and Environmental Protection Agency, has reviewed and concurs with the content of this letter. If you have any questions concerning the contents of this letter or the status of this case, please contact Hazardous Materials Specialist, Ariu Levi. Mr. Levi can be reached at 415-271-4320.

Sincerely,

Edgar B Howell for

Rafat Shahid, Chief
Hazardous Materials Program

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Mark Thompson, Alameda County District Attorney, Consumer and
Environmental Protection Attorney,
Lester Feldman, RWQCB
Howard hatayama, DOHS
Jack Hecht, Learner Facility
Paul Shorb, Heller, Ehrman, White & McAuliffe
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



Department Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

Telephone Number: (415) 271-4320

February 1, 1989

Mr. Roger Carrick
Heller, Ehrman, White & McAuliffe
Suite 1230
515 South Figueroa Street
Los Angeles, CA 90071-3301

Re: Learner Company at 768 46th Ave. in Oakland.

Dear Mr. Carrick:

The report provided by Dames and Moore dated August 26, 1988 and submitted to this office on December 14, 1988 for the ongoing site assessment of Learner Company property at 768 46th Ave. in Oakland has been reviewed.

It is apparent from this report, titled "Phase II of Environmental Site Assessment", that surface and subsurface soils contamination exists at levels that will require remediation.

The findings by Dames and Moore show soil contamination by petroleum hydrocarbons to 3770 ppm at 2.5 ft depth and PCBs by composite sampling to 25.2 ppm from soil pile P1. Soil contamination by TPH was discovered in concentrations in excess of 1,000 ppm in all areas sampled. PCBs were found in both soil piles and the narrow drive.

In light of the contamination found, Dames and Moore presented four general recommendations for further site assessment and remediation alternatives. This office finds these recommendations acceptable as the general approach to further assessing the degree of contamination, and as alternatives to off hauling the contaminated soil to a Class 1 dump.

The proposed additional sampling to segregate clean from contaminated soil will be accepted with the following provisions:

1. A sampling plan that provides for a minimum number of samples per area of concern will be submitted as part of the plan of correction.

Learner Company
February 1, 1989
Page 2

2. The required sampling will include a minimum number of discreet samples. Composite samples will be accepted as indicators of zones of contamination.

In addition to the soils contamination, two other problems must be addressed. The railroad ties are creosote saturated timber and as such must be treated as hazardous. Also, the possibility of ground water contamination cannot be dismissed without proper evaluation.

If you have any questions concerning the contents of this letter or the status of this case please contact Hazardous Materials Specialist, Ariu Levi. Mr. Levi can be reached at 415-271-4320.

Sincerely, *Rafat A. Shahid*
Rafat Shahid, Chief
Hazardous Materials Program

cc: DOHS, Howard Hatayama
RWQCB, Lester Feldman
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Jack Hecht, Learner Company

FUELLEAK CASE FORM

Review Date 10 / 10 / 88

Site Name Leanner Company
Streetnumber 768
Street 46th ave
City Oakland
County Number 01

Priority C

X Rank _____

Primary Substance 8006619

Secondary Substance _____

Waste Oil _____

Case Type U G D

Status N

Well Status C

Soil Affected Y U

Max. Soil Conc. (ppm) _____

Max. Residual Soil (ppm) _____

Soil Status N

Groundwater Affected Y U

Max. Groundwater Impact _____

Groundwater Status N

Depth to Groundwater _____

Drinking Water Affected Y U

Drinking Water Status N

Remedial Action NA

Proof Action Needed AD

Date of Last Corr 7 / 20 / 88

Date Case Recieved / /

Case Evaluated By DRC

Consultant K&I Lab SEQ

1000 L 1

HELLER, EHRMAN, WHITE & MCAULIFFE

ATTORNEYS

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

333 BUSH STREET
SAN FRANCISCO, CALIFORNIA 94104-2878
TELECOPIER (415) 772-6268
TELEPHONE (415) 772-6000

525 UNIVERSITY AVENUE
PALO ALTO, CALIFORNIA 94301-1908
TELECOPIER (415) 324-0638
TELEPHONE (415) 326-7600

ROGER LANE CARRICK

SUITE 1230
515 SOUTH FIGUEROA STREET
LOS ANGELES, CALIFORNIA 90071-3301
TELECOPIER (213) 614-1868
TELEPHONE (213) 689-0200

999 THIRD AVENUE
SEATTLE, WASHINGTON 98104-4011
TELECOPIER (206) 447-0849
TELEPHONE (206) 447-0900

1300 S. W. FIFTH AVENUE
PORTLAND, OREGON 97201-5696
TELECOPIER (503) 241-0950
TELEPHONE (503) 227-7400

15105-0002

May 25, 1988

Via Federal Express

Mr. Rafat Shahid, Chief
Hazardous Materials Program
Alameda County Health Care Services Agency
Department of Environmental Health
470 27th Street, Third Floor
Oakland, California 94612

RECEIVED
MAY 31 1988
U.S. MAIL
FEDERAL EXPRESS

Re: Notice of Violation dated May 13, 1988

Dear Mr. Shahid:

I am writing on behalf of our client, the Learner Company, concerning your letter dated May 13, 1988, regarding your notice of alleged violation at the Learner Company's property at 768 46th Avenue in Oakland, California.

As you know, I have been in close telephone communication with Mr. Ariu Levi of your office concerning his initial site visit on January 25, 1988. I regret that a lapse in my communications with Mr. Levi, due to my changing law firms, led to his letter dated April 29, 1988, but I want to assure you that the Learner Company remains committed, as we have always indicated to Mr. Levi, to resolving any difficulties with the site.

To that end, and as I pointed out to Mr. Levi by telephone earlier this month, the Learner Company has retained the environmental consulting firm of Dames & Moore to conduct a comprehensive environmental audit of the site under my direction as special environmental counsel. We anticipate that this audit will result in a complete site characterization study being

Mr. Rafat Shahid, Chief
May 25, 1988
Page 2

available to the Learner Company within 30 days. In light of the recommendations from these technical consultants, the Learner Company will resolve any environmental contamination problems that may be discovered pursuant to applicable county, state and Federal law.

In all future dealings with the Learner Company, would you please address your communications directly to me or copy me in any communications sent directly to the Learner Company.

If you have any questions concerning this matter, please call me at (213) 689-0200.

Sincerely,


Roger Lane Carrick

cc: Jack Hecht
Learner Company

SEARCHED
SERIALIZED
MAY 25 1988
FBI - LOS ANGELES

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Certified Mailer #P759 896 342

DEPARTMENT OF ENVIRONMENTAL HEALTH
470 - 27th Street, Third Floor
Oakland, California 94612
(415) 271-4320

May 13, 1988

The Learner Corp.
Mr. Jack Hecht
2711 Navy Dr.
Stockton, Ca., 95203

Re: Second Notice of Violation, 46th Ave., Oakland

Dear Sir:

Enclosed is a copy of your notice of violation initially sent April 29, 1988. From a conversation with Mr. Carrick on May 12, 1988, it appears you may not have received the original letter.

You are requested to respond to the notice of violation within fifteen (15) days from the above letter date. Please disregard the response deadline noted on the N.O.V..

If you have any questions concerning this matter please contact Ariu Levi, Hazardous Materials Specialist, by calling 415-271-4320.

Sincerely,

Rafat Shahid, Chief,
Hazardous Materials Program

cc: Gil Jensen, Alameda County District Attorney's Office
Pete Johnson, RWQCB
Dwight Hoenig, DOHS

P 759 898 342
RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

Sent to MR. JACK HECHT	
THE LEARNER CORP.	
Street and No. 2711 NAVY DR.	
P.O., State and ZIP Code STOCKTON, CA 95203	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$

June 1985

P 833 981 378

RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

Sent to JACK HECHT	
Street and No. 2711 NAVY DR.	
P.O., State and ZIP Code STOCKTON	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3800, June 1985

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



AL

DEPARTMENT OF ENVIRONMENTAL HEALTH
470 - 27th Street, Third Floor
Oakland, California 94612
(415)

April 29, 1988

The Learner Corp.
Mr. Jack Hecht
2711 Navy Dr., Ca. 95203
Stockton, CA

Re: SECOND NOTICE VIOLATION, 46TH AVE., OAKLAND

7683
94601

Dear Sir:

This letter confirms my conversation with your attorney, Mr. Roger Carrick, on 4/8/88, and serves as your second notice of violation for conditions found at 46th Ave., Oakland.

In review, an inspection of your facility at 46th Ave., Oakland, was conducted 1/25/88 by Hazardous Materials Specialists A. Levi and M.J. Barnes. The inspection found a large quantity of scrap metal stored through out the property with a concentration of refuse metal around the unit identified by your employee as a bailer, or metal crushing bailing unit. Also evident around the bailer were several ponds of water with what appeared to be severe oil or grease contamination. Samples of the water from the ponds and soil from an area adjacent to the bailer were taken and submitted to the Environmental Health Lab. The lab was requested to characterize and quantify the apparent contaminants. In addition to sampling, photographs were taken of the bailer area and the facility in general. The lab results showed the samples to contain approximately 10% by volume oil and grease.

Section 25189d, California Health and Safety Code, states, any person who negligently disposes or causes the disposal of any hazardous or extremely hazardous waste, at a point which is not authorized shall be subject to a civil penalty of not more than twenty five thousand dollars (\$25,000) per day for each violation.

Section 25189.2a, California Health and Safety Code, states, any person who makes any false statement or representation in any application, label, manifest, record, report, permit, or other document, filed, maintained, or used for purposes of compliance with this chapter, is liable for a civil penalty not to exceed ten thousand dollars (\$10,000) for each violation for each day.

Section 25189.5a, California Health and Safety Code, states, the disposal of any hazardous waste, or the causing thereof, is prohibited when the disposal is at a facility which does not have a permit from the department issued pursuant to this chapter, or at any point which is not authorized according to this chapter.

Section 66189.5b5, California Administrative Code, Title 22, states, Scrap metal excludes any metal contaminated with an oil that is a hazardous waste.

Section 66328d, California Administrative Code, Title 22, states, if corrections are needed, the operator shall provide the department with a written plan of correction, which states the actions to be taken and the expected dates of completion.

Your plan of correction must include, but is not limited to the following:

1. Define the horizontal and vertical extent of contamination by sampling. Identify sampling methods.
2. Proposed clean up actions
3. Name of licensed hazardous waste hauler
4. Location of disposal facility
5. Measures that will be taken to prevent this type of problem from reoccurring.
6. Identify intent to submit copies of all manifests and receipts for all hazardous waste removed.
7. Identify intent to start clean up after receiving approval by this agency for submitted plan of correction.

You are requested to respond to this letter within fifteen (15) working days from the above letter date.

If you have any questions concerning this matter, your contact person is Ariu Levi, Hazardous Materials Specialist. He can be reached at 415-271-4320.

Sincerely,

Rafat A. Shahid
Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:AL:mnc

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Pete Johnson, RWQCB
Dwight Hoenig, DOHS

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 HAZARDOUS MATERIALS DIVISION
 470 - 27TH ST., RM. 322
 OAKLAND, CA 94612
 PHONE NO. 415/874-2237

RECEIVED
 HAZARDOUS MATERIALS DIVISION
 4/20/88

Project # U505662
 Fee Paid \$300.00
 Date 4-20-88

ACCEPTED
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 470 - 27th Street, Third Floor
 Oakland, CA 94612
 Telephone: (415) 874-2237

Plans have been prepared and found to be acceptable and meet the requirements of State and local health laws. Changes in plans indicated by the Department are to comply with State and local laws. The project must be completed within the time frame of any permit or other regulatory requirements. The Department will be notified of any changes or alterations to the plans or specifications. All construction must be in accordance with the approved plans. The Department will be notified of any changes or alterations to the plans or specifications. All construction must be in accordance with the approved plans.

Removal of Tank and Piping
 Installation
 Issuance of a permit to operate is dependent on compliance with accepted plans and all applicable laws and regulations.
 THERE IS A FINANCIAL PENALTY FOR NOT OBTAINING THESE INSPECTIONS.

TEST FOR TOTAL TPH BY DONS SOIL
 PROVIDE OWNER ON AUTHORIZED AGENT SIGNATURE

UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

- Business Name The Learner Co
 Business Owner The Learner Co
- Site Address 760 27th Ave
 City Oakland Zip 94601 Phone _____
- Mailing Address 2711 Mary Drive
 City Stockton Ca Zip 95206 Phone 209-948-3498
- Land Owner The Learner Co
 Address 2711 Mary Drive City, State Ca Zip 95206
- EPA I.D. No. CA0000079629
- Contractor R W Tolmerton & S.
 Address 801-53rd Ave
 City Oakland Ca Zip 94601 Phone 201-9424
 License Type 4-9 ID# 289839
- Other (Specify) _____
 Address _____
 City _____ Phone _____

8. Contact Person for Investigation

Name G.W. Johnson Title Contractor

Phone 261-9424

9. Total No. of Tanks at facility 1

10. Have permit applications for all tanks been submitted to this office? Yes [] No []

11. State Registered Hazardous Waste Transporters/Facilities

a) Product/Waste Transporter

Name H & H Ship Service Co EPA I.D. No. CA 00477168

Address P.O. Box 10753

City San Francisco State Ca Zip 94107

b) Rinsate Transporter

Name Same as (a) EPA I.D. No. _____

Address _____

City _____ State _____ Zip _____

c) Tank Transporter

Name Same as (a) EPA I.D. No. _____

Address _____

City _____ State _____ Zip _____

d) Contaminated Soil Transporter

Name Same as (a) EPA I.D. No. _____

Address _____

City _____ State _____ Zip _____

12. Sample Collector

Name Kaprelian

Company Kaprelian Engineering

Address 535 Main St

City Benecia State Ca Zip 94553 Phone 372-5404

13. Sampling Information for each tank or area

Tank or Area		Material sampled	Location & Depth
Capacity <i>1000 gal</i>	Historic Contents (past 5 years) <i>Ris 151</i>		

14. Have tanks or pipes leaked in the past? Yes [] No []

If yes, describe. _____

No tanks

15. NFPA methods used for rendering tank inert? Yes [] No []

If yes, describe. *15# Dry Ice per 1000 gal*

16. Laboratories

Name *Seymour Lab*

Address *2549 Middlefield Rd*

City *Redwood City* State *CA* Zip *94063*

State Certification No. *145*

364-9332

17. Chemical Methods to be used for Analyzing Samples

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Number

18. Site Safety Plan submitted? Yes [] No []

19. Workman's Compensation: Yes [] No []

Copy of Certificate enclosed? Yes No []

Name of Insurer Republic Indemnity

20. Plot Plan submitted? Yes No []

21. Deposit enclosed? Yes [] No []

22. Please forward to this office the following information within 60 days after receipt of sample results.

- a) Chain of Custody Sheets
- b) Original Signed Laboratory Reports
- c) TSD to Generator copies of wastes shipped and received
- d) Attachment A summarizing laboratory results

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true. I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I will notify the Department of Environmental Health at least two (2) working days (48 hours) in advance to schedule any required inspections. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

Signature of Contractor

Name (please type) RH BURGE

Signature RH Burge

Date 4/21/88

Signature of Site Owner or Operator

Name (please type) _____

Signature _____

Date _____

NOTES:

1. Any changes in this document must be approved by this Department.
2. Any leaks discovered must be submitted to this office on an underground storage tank unauthorized leak/contamination site report form within 5 days of its discovery.
3. Three (3) copies of this plan must be submitted to this Department. One copy must be at the construction site at all times.
4. A copy of your approved plan must be sent to the landowner.

UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

ATTACHMENT A

SAMPLING RESULTS

Tank or Area	Contaminant	Location & Depth	Results (specify units)

INSTRUCTIONS

2. SITE ADDRESS

Address at which closure or modification is taking place.

5. EPA I.D. NO.

This number may be obtained from the State Department of Health Services, 916/324-1781.

6. CONTRACTOR

Prime contractor for the project.

7. OTHER

List professional consultants here.

12. SAMPLE COLLECTOR

Persons who are collecting samples.

13. SAMPLING INFORMATION

Historic contents - the principal product(s) used in the last 5 years.

Material sampled - i.e., water, oil, sludge, soil, etc.

16. LABORATORIES

Laboratories used for chemical and geotechnical analyses.

17. CHEMICAL METHODS:

All sample collection methods and analyses should conform to EPA or DHS methods.

Contaminant - Specify the chemical to be analyzed.

Sample Preparation Method Number - The means used to prepare the sample prior to analyses - i.e., digestion techniques, solvent extraction, etc. Specify number of method and reference if not an EPA or DHS method.

Analysis Method Number - The means used to analyze the sample - i.e., GC, GC-MS, AA, etc. Specify number of method and reference if not a DHS or EPA method.

NOTE:

Method Numbers are available from certified laboratories.

18. SITE SAFETY PLAN

A plan outlining protective equipment and additional specialized personnel in the event that significant amount of hazardous materials are found. The plan should consider the availability of respirators, respirator cartridges, self-contained breathing apparatus (SCBA) and industrial hygienists.

19. ATTACH COPY OF WORKMAN'S COMPENSATION

20. PLOT PLAN

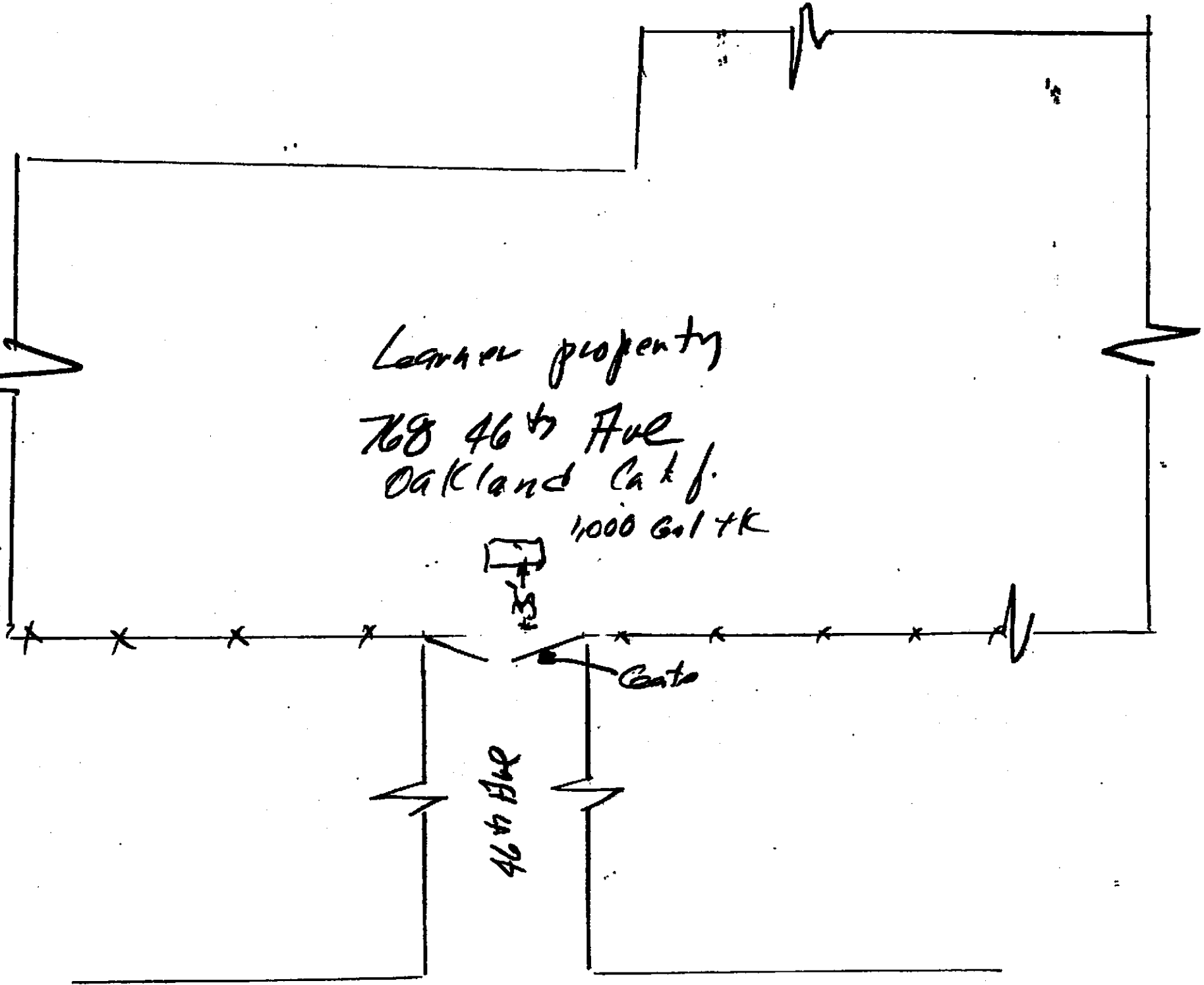
The plan should consists of a scaled view of the facility at which the tank(s) are located and should include the following information:

- a) Scale
- b) North Arrow
- c) Property Line
- d) Location of all Structures
- e) Location of all relevant existing equipment including tanks and piping to be removed
- f) Streets
- g) Underground conduits, sewers, water lines, utilities
- h) Existing wells (drinking, monitoring, etc.)
- i) Depth to ground water
- j) All existing tanks in addition to the ones being pulled

1/88

R. W. JOHNSTON & SON
GENERAL CONTRACTORS
801 - 53RD AVENUE
OAKLAND, CALIFORNIA 94612

Learner property
768 46th Ave
Oakland Calif.
1000 Gal + K



Colliseum Way

Notes: Cont.

5. Triple rinse means that:

- a) final rinse must contain less than 100 ppm of Gasoline (EPA method 8020 for soil, or EPA method 602 for water) or Diesel (EPA method 418.1) Other methods for halogenated volatile organics (EPA method 8010 for soil, EPA method 601 for water) may be required. The composition of the final rinse must demonstrated by an original or facsimile report from a laboratory certified for the above analyses.
- b) tank interior is shown to be free from deposits or residues upon a visual examination of tank interior.
- c) tank should be labelled as "tripled rinsed; laboratory certified analysis available upon request" with the name and address of the contractor.

If all the above requirements cannot be met, the tank must be transported as a hazardous waste.

6. Any cutting into tanks requires local fire department approval.

17. Chemical Methods to be used for Analyzing Samples

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Number

18. Site Safety Plan submitted? Yes [] No []

19. Workman's Compensation: Yes [] No []

Copy of Certificate enclosed? Yes No []

Name of Insurer Republic Indemnity

20. Plot Plan submitted? Yes No []

21. Deposit enclosed? Yes [] No []

22. Please forward to this office the following information within 60 days after receipt of sample results.

- a) Chain of Custody Sheets
- b) Original Signed Laboratory Reports
- c) TSD to Generator copies of wastes shipped and received
- d) Attachment A summarizing laboratory results



CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY)
4/20/88 scr

PRODUCER

PUTNAM, KNUDSEN & WIEKING
INSURANCE BROKERS
P.O. BOX 24205
OAKLAND, CA 94623-4205
TEL: (415) 834-4560

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

COMPANIES AFFORDING COVERAGE

- COMPANY LETTER **A** REPUBLIC INDEMNITY
- COMPANY LETTER **B**
- COMPANY LETTER **C**
- COMPANY LETTER **D**
- COMPANY LETTER **E**

INSURED

R.W. JOHNSTON & SON, INC.
801 - 53RD AVE.
OAKLAND, CA 94601

COVERAGES

THIS IS TO CERTIFY THAT POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS, AND CONDITIONS OF SUCH POLICIES.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	ALL LIMITS IN THOUSANDS
	GENERAL LIABILITY <input type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input type="checkbox"/> OCCURRENCE <input type="checkbox"/> OWNER'S & CONTRACTORS PROTECTIVE				GENERAL AGGREGATE \$ PRODUCTS-COMP/OPS AGGREGATE \$ PERSONAL & ADVERTISING INJURY \$ EACH OCCURRENCE \$ FIRE DAMAGE (ANY ONE FIRE) \$ MEDICAL EXPENSE (ANY ONE PERSON) \$
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS <input type="checkbox"/> GARAGE LIABILITY				CSL \$ BODILY INJURY (PER PERSON) \$ BODILY INJURY (PER ACCIDENT) \$ PROPERTY DAMAGE \$
	EXCESS LIABILITY <input type="checkbox"/> OTHER THAN UMBRELLA FORM				EACH OCCURRENCE \$ AGGREGATE \$
A	WORKERS' COMPENSATION AND EMPLOYERS' LIABILITY	PC989901	7/01/87	7/01/88	STATUTORY \$ 1,000 (EACH ACCIDENT) \$ 1,000 (DISEASE-POLICY LIMIT) \$ 1,000 (DISEASE-EACH EMPLOYEE)
	OTHER				

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/RESTRICTIONS/SPECIAL ITEMS

INSURED CALIFORNIA OPERATIONS

CERTIFICATE HOLDER

ALAMEDA COUNTY HEALTH DEPT.
HAZARDOUS MATERIALS DIVISION
470 - 27TH ST., ROOM #322
OAKLAND, CA 94612

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT SHALL NOT BE BOUND BY SUCH NOTICE UNLESS IT IS RECEIVED BY THE ISSUING COMPANY BY THE EXPIRATION DATE OF THE POLICY.

AUTHORIZED REPRESENTATIVE

JPW/LM/scr