

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



BENT
7-23-04

July 22, 2004

Ms. Diane Heinze
Port of Oakland
530 Water St.
P.O. Box 2064
Oakland, CA 94604-2064

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

Dear Ms. Heinze:

Subject: TOXICS Case RO0002492, Port of Oakland/Ninth Avenue Terminal,
370 8th Ave., Oakland, CA 94606

In order for ACEH to review reports for your site, we would require an oversight account for the above-referenced site. As you are aware, we have recently merged a number of former underground storage tank LOP cases with the existing Toxics (SLIC) case at this site. 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 \$12,000.00. Please send your check to the attention of our Finance Department.

This initial 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, 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 \$160.00 per hour.

Please write "TOXICS" (the type of project), the site address and the AR# 03410.90 on your check.

If you have any questions, please contact me at (510) 567-6862.

Sincerely,

Arin Levi
Division Chief

cc: D. Drogos, B. Chan

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



East
7-22-04

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-8700
FAX (510) 337-9335

July 22, 2004

Ms. Diane Heinze
Port of Oakland
PO Box 2064
Oakland, CA 94604-2064

Dear Ms. Heinze:

Subject: TOXIC Case No. RO2492 (and previous RO106, RO108, RO109, RO110, RO244, RO485) Port of Oakland / Ninth Avenue Terminal, 370 8th Avenue, Oakland, CA 94606

Alameda County Environmental Health (ACEH) staff has recently reviewed the case file for the subject site and the October 13, 2003 Port of Oakland letter proposing specific monitoring changes, well closures, LOP site closure and work plans. We have the following technical comments to this letter.

TECHNICAL COMMENTS

The Ninth Avenue Terminal site consists of Port of Oakland properties in the areas bordered by the Embarcadero, 7th Avenue, 10th Avenue and the Oakland-Alameda estuary. Impacted parcels and areas have been identified from authoritative sampling of UST areas, aboveground tank locations, subsurface utilities and former surface release and hazardous materials storage areas. ACEH has approved the investigations of the suspected impacted areas, however, heretofore, the Port and their consultants have directed investigations. The work was done to identify source areas related to past operations and storage of hazardous materials. Initially, other sources were investigated to determine if they could have contributed to the historic release observed from the "Keep-On-Trucking" site. Most sites identified were determined not to have contributed to this historic release. However, the Port identified additional RPs as owners and/or operators of USTs in locations where petroleum contamination had been detected. Those sites associated with the USTs were put into ACEH LOP. Apparently, the Port has settled responsibility issues with these RPs, since it has accepted primary RP status for the entire site, collectively and commonly known as the Ninth Ave. Terminal. Although some of the sites have been investigated more than others, much of the investigation was performed treating the multiple sites using a regional site-wide approach. Remediation has consisted solely of free product removal from areas where it has collected, i.e. manholes and wells, and USTs and soil removal.

The Port requested, in their July 29, 2003 letter, that work at the entire site be suspended until the close of escrow with Oakland Harbor Partners (OHP), projected to be between September 2005 and September 2007. The assumption was that OHP would develop a Regional Approach for the remediation of this site, which is part of the Oak to Ninth project encompassing approximately 62 acres. ACEH's September 11, 2003 letter stated we did not concur with this proposal since this would not be protective of human health and the environment, nor in compliance with environmental regulations. The Port's responded to ACEH's letter in their October 13, 2003, Ninth Avenue Terminal letter, which ACEH addresses below.

1. **Regional Case Approach** – ACEH has decided to combine all existing and all future release areas at this site into one site, which is consistent with the Regional Approach. This decision is based upon the following observations:
 - Site information has previously been presented individually or consolidated into a site-wide monitoring report. Several of the LOP sites within the Ninth Ave. Terminal area have been proposed for no further action by the Port. Data is scattered among seven sites, six LOP and one TOXIC (SLIC). Consolidation of sites and data will allow for easier data presentation, review and interpretation. No further action can be given to specific tank locations while the other areas of concern continue to be investigated, with site closure as the ultimate objective.
 - Cost apportionment has been completed between the Port and RPs and no other RPs are expected to be identified.
 - Given the expected most conservative future residential use of the site, it makes sense to use a regional approach and consolidate all sites.
 - Additional contamination is likely to be identified given the historic industrial site use and the presence of solvent contamination. Petroleum contamination has been identified in areas remote from known UST releases indicating the potential of additional surface releases. Contamination may be discovered during the demolition of buildings during development. Under the single site scenario, no new sites would need to be established.

As such, ACEH will consolidate Fuel Leak Case No. RO106, RO108, RO109, RO110, RO244, RO485 into one case, RO2492, named Port of Oakland / Ninth Avenue Terminal. A letter requesting additional fees for this account will follow.

2. **Work Plan Review** - Based upon the assumption that OHP would develop a regional approach, the Port suspended monitoring and proposed work plan activities. However delays in the sales has made this regional approach unpredictable. Several site-specific work plans have been submitted to ACEH, which the Port has recently committed to implement. ACEH will be providing comment on the submitted work plans addressing specific UST release areas. ACEH will also be requesting work plan(s) for additional site characterization of contaminants at this site.
3. **Plume Characterization** - The Port's October 13, 2003 letter states that groundwater impacts remain relatively consistent and plumes are stable, however, no specific data was provided to support this claim. In addition, most sites have not been completely characterized, therefore, it is not yet appropriate to discuss plume stability.
4. **Human Health and Ecological Risk Assessment** - A formal human health or environmental risk assessment has not been performed for the site; therefore, it is premature to suggest that the site currently poses minimal risk to human health and the environment. ACEH notes that a prior soil vapor study performed at the site identified numerous locations where soil vapor samples exceeded 10% of the LEL of methane, indicative of a potential hazardous condition.

5. Comments to Technical Proposals - The Port has made a number of proposals in reference to the investigation, remediation and monitoring of this site. ACEH has the following technical response to the proposed changes in monitoring and recommendations for UST investigation and closure.

a. Monitoring and Well Decommissioning Recommendations

MW #	Port of Oakland Proposal	County Comment/Rationale
MW-2	Discontinue TEHd, mo	KOT UST area. Perimeter well around FP. Continue annual TEHd, mo w/silica gel
MW-3	Discontinue BTEX, MTBE, Continue annual TEHd, mo	Concur
MW-4	Discontinue all analysis, remove FP annually	Bailing not sufficient, propose remediation method, analyze FP for TPHg, d, mo, BTEX and MTBE.
MW-5	Discontinue	KOT UST area. Perimeter well around FP. Continue annual TEHd, mo w/silica gel
MW-6	Discontinue	Bailing not sufficient, propose remediation method, analyze FP for TPHg, d, mo, BTEX and MTBE.
MW-7	Destroy well	Continue DTW annually. County will consider Port's closure request for no further work
SCIMW-1	Discontinue	Continue DTW annually.
SCIMW-2	Annual TEHd, mo w/silica gel, discontinue metals	Concur, perimeter well, near former ASTs, historic TEHd, mo impact, up to 2001, currently 120 ppb diesel.
SCIMW-3	Continue annual TEHd, mo	Concur, down gradient of former AST farm
SCIMW-4	Water level readings only	Concur, up gradient perimeter well
SCIMW-6	Water level readings only	Concur, perimeter well, not impacted
SCIMW-7	TEHd, mo, VOCs, pesticides annually	Solvent, TPH, pesticides release. Sample qtrly for TPHg, BTEX, VOCs, TPHd, mo and pesticides. Area will require additional investigation & possible remediation, WP will be requested.
SCIMW-8	TEHd, mo w/silica gel annual	Concur, along bulkhead, TEHd, mo ND since 1998
SCIMW-9	Continue annual TEHd, mo	Concur, former AST area, up to 7000ppb TEHmo (1/2003)
SCIMW-10	Discontinue TEHd, mo	Concur, annual water elevation readings
SCIMW-11	TVH, BTEX, TEHd, mo SA to A	Concur, well down gradient of UST
SCIMW-13	Discontinue annual TEHd, mo	Well within former AST area with historic release, continue annual TEHd, mo
SCIMW-15	SA to A, TEHd, mo	Concur, well along bulkhead
SCIMW-16	Water level only	Concur, TEHd low to ND
SCIMW-18	Discontinue TEHd, mo	Concur, annual DTW level, down gradient of former ASTs, near storm drain
SCIMW-19	Water level only	Concur, up gradient perimeter well, TEHd, mo ND
SCIMW-21	Discontinue	Annual DTW level, outside of Bldg H-229, TEHd, mo ND since 1998
SCIMW-22	Discontinue	Solvent area well, run VOCs annually
SCIMW-23	Destroy well	Concur, well has low to ND TEHd, mo, and is at risk from potential surface releases due

		to no surfacing and high vehicle traffic
SCIMW-24	BTEX, TVH and TEHd, mo SA to A	Monitoring should remain as SA. Elevated concentrations present (1997-2003). Will review Port's 11/7/03 second phase investigation wp
SCIMW-26	Discontinue BTEX, MTBE, continue A TEHd, mo	Concur, but run TVH annually since it has been analyzed only once, well is up gradient & at perimeter of FP area.
SCIMW-28	Heavy metals SA to A	Concur, also run VOCs annually, well is near the solvent release area along RR track & down gradient of Lakeside Metal UST
SCIMW-29	Discontinue BTEX and MTBE	Concur, but run TEHd, mo annually, this well is near impacted well MW-6, in the KOT UST area.
SCIMW-30	Discontinue all analyses	Well was installed in VOC release area, monitor for VOCs annually
SCIMW-31D	VOCs SA to A	Concur, County will request additional invest. wp for the VOC release, including possible additional deep gw sampling
SCIMW-32	No monitoring proposed	Well is within the solvent release area, run VOCs annually, gradient appears radial
SCIMW-33	TEHd, mo, VOCs and pesticides annually	Concur, well is monitoring solvent release area
SCIMW-34	Discontinue BTEX, MTBE, TVH, PNAs and metals, TEHd, mo SA to A	Concur, also add TVH annually along with TEHd, mo, well was installed for the investigation of diesel and gasoline USTs, County to review 5/03 wp
SCIMW-35	Discontinue BTEX and TVH	Analyze for TVH, BTEX and TPHd annually, monitoring is subject to results of future investigation, County to review 5/03 wp

b. UST Removal and Closure Status

Case #	UST Name	Bldg Location	Current Status	County Response
RO0000106	HF-03	H-107	Closure requested	County will review site for potential no further action
-----	HF-02	H-213	Port submitted wp, 5/2003	County will review wp
RO0000109	HF-12 & HF-13	H-211	11/02 wp approved, Port requests suspension, Bldg above UST occupied by OPD	Concur, Port should evaluate data and propose investigation of area outside of building.
RO0000108	HF-14 & HF-15	H-209	USTs closed-in-place, closure requested	County will review closure report and NFA request
RO0000485	HF-16	H-204	8/2003 invest report submitted to County, Port submitted 11/7/03 addnl s&gw wp	County will review 8/03 report and 11/7/03 wp

-----	HF-17	H-227	8/2003 invest report submitted to County	County will review 8/03 report, provide comments & respond to request to put site invest on hold.
RO000244	HF-19	H-314	Port submitted wp 5/03.	County will review 5/03 wp
RO000110	HF-20&HF-21	H-317	Port submitted wp 5/03.	County will review 5/03 wp
RO0002492	Solvent release area, surface release areas, HF-02, HF-17	Entire site	SLIC case for entire 9 th Ave. Terminal site, wp and reports exist for USTs, HF-02 and HF-17	a specific wp request will be sent pertaining to the solvent release(s)

6. **Professional Registration Requirement** - It is noted that the Port has made specific observations and recommendations for this site in the October 13, 2003 Response Letter. The California Business and Professions Code (Sections 6735, 6835, and 7835.1) require that all work plans and technical reports containing professional geologic or engineering evaluations and/or judgments be completed under the direction of an appropriately registered or certified professional. This registered or certified professional shall sign and wet stamp all such reports and work plans. Therefore, please resubmit your response letter under your registered professional stamp.

7. **Perjury Statement** - All work plans, technical reports, or technical documents submitted to this office must be accompanied by a cover letter from the responsible party that states, at minimum, the following:

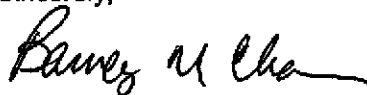
"I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true to the best of my knowledge."

This letter must be signed by an officer or legally authorized representative of your organization. A review of our case files indicates that none of your reports were submitted with a perjury statement.

As previously mentioned, ACEH will be responding to investigation work plans and reports for each individual referenced site. We will also be responding to the Port recommendations to put some investigations on hold. At this time, we request that you proceed with groundwater monitoring according to the proposed County Response schedule.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, D. Drogos
B. Graham, RWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



12-12-03

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

December 12, 2003

Port of Oakland
Mr. Jeff Rubin
530 Water Street
Oakland, CA 94604-2064

Re: Deposit for Ninth Avenue Terminal, 370 Eight Ave., Oakland, CA 94606

Dear Mr. Rubin:

As you are aware, Alameda County Environmental Health has been providing oversight for the referenced site on UST and non-UST release issues. In order for our office to continue to provide regulatory oversight, a deposit/refund account must be created. Please submit a deposit of \$5000.00, 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, additional deposit 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 \$158.00 per hour.

Please write the following information on your check or cover letter.

- Type of project (Site mitigation) and RO0002492, and
- Site address (370 Eight Ave., Oakland, 94606)

If you have any questions, please contact me at (510) 567-6765.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, D. Drogos

DepNinthAveTerminal

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



12-13-02

202492

December 13, 2002

Mr. Doug Herman
Port of Oakland
P.O. Box 2064
Oakland, CA 94604-2064

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

Dear Mr. Herman:

Subject: Suspected site of UST HF-17, Building H-227, Ninth Ave. Terminal,
Oakland, CA 94606

Alameda County Environmental Health, Local Oversight Program (LOP), has received and reviewed the October 8, 2002 Final Site Investigation Work Plan for the referenced site. As you are aware, this site is located within a larger area of environmental impact commonly referred to as the Ninth Ave. Terminal site. This report also states that this Ninth Ave. site is within an even larger potential development area designated as the Oak to Ninth District. Although the proposed future use of this area is commercial, UST and SLIC closures must either evaluate all potential exposure scenarios or ensure the site is re-evaluated if a more conservative site usage is planned.

A 10,000 gallon underground tank is reported to have been located at this site northeast of Building H-227. Although prior investigation did not produce evidence of this tank, the investigation is not considered thorough. Therefore, this work plan proposes potholing areas within the presumed UST area along with performing a geophysical survey. In regards to the work plan, I have the following comments:

- Please submit a signed, stamped cover letter from your consultant for this report.
- Should a UST be found, the removal of the UST should be done through the City of Oakland Fire Department. If product is found in the tank, it should be analyzed to confirm that the proposed analytes are consistent with the contents.
- Please make note of any utilities found during the investigation since they pose a potential preferential migration pathway.
- Please identify any tank remnants in the event a UST is not found. Significant evidence must exist before the site can be transferred to LOP.
- Even if a UST is not found, you must determine if the release in this area requires additional soil and groundwater investigation. There is a lack of monitoring wells in this area.
- Please notify our office when the investigation is scheduled.

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

Sincerely,

A handwritten signature in black ink that reads "Barney M. Chan".

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Ms. S. von Rosenberg, GAIA Consulting, 2101 Webster St., 12th Floor, Oakland, CA 94612
Ms. J. Alexander, Fugro, 1000 Broadway, Suite 200, Oakland, CA 94607
Mr. L. Griffin, City of Oakland Fire Dept., 1605 Martin Luther King Jr. Way, Oakland,
CA 94612

HF17Invwp

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 7-12-2000

R02492

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

July 11, 2000

Mr. Douglas Herman
Environmental Health & Safety Compliance Department
Port of Oakland
P.O. Box 2064
Oakland CA 94607-2064

Re: Proposed Monitoring Changes at Ninth Ave. Terminal, Oakland CA 94606

Dear Mr. Herman:

Our office has received and reviewed the June 15, 2000 Groundwater Monitoring Program Report for the above site. Included in this report is your consultant's recommendation for modifications to the existing sampling program. This letter serves to comment on these recommendations. Upon review of current and historical monitoring data and information, our office has the following comments/observations:

- The following wells are proposed to be abandoned: MW-1, SCIMW-5, SCIMW-11, SCIMW-14, SCIMW-17, SCIMW-20, SCIMW-25 and SCIMW-35. Our office agrees with the abandonment of these wells with the exception of SCIMW-11 and SCIMW-35. SCIMW-24, up-gradient of SCIMW-11, still has high TPHg, d, mo and BTEX concentrations in groundwater. SCIMW-11 should continued to be monitored for the existing parameters semi-annually. SCIMW-35 is down-gradient of a former UST where significant concentrations of TPHg, d, mo, BTEX, lead, and PNAs were exhibited in soil. Please run groundwater samples on this well annually for TPHg and BTEX, until the LOP case (StID #5067) is closed.
- The following wells are proposed to be monitored for water level only: MW-7, SCIMW-4, SCIMW-6, SCIMW-12, SCIMW-16, SCIMW-19, SCIMW-27 and SCIMW-32. Our office agrees with this proposal.
- The following wells are proposed to reduce their TVH testing frequency from quarterly to semi-annually: SCIMW-24 and SCIMW-34. SCIMW-34 is installed adjacent to a former UST where significant soil contamination was observed (same UST mentioned for SCIMW-35 above). To complete groundwater sampling at this LOP site, please analyze this well for semi-volatiles by EPA 8270 and the soluble metals; cadmium, chromium, nickel and zinc. After this, the well should be monitored like SCIMW-35. TVH testing is proposed to be discontinued in wells MW-6 and SCIMW-11. Note, since our office concurs with the abandonment of SCIMW-11, monitoring is irrelevant. Testing of MW-6 may be discontinued until the free product has been removed, at which time annual testing should continue similar to that of MW-4, which also has a free product problem.

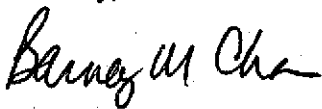
Mr. D. Herman
Ninth Ave. Terminal, Oakland 94606
July 11, 2000
Page 2.

- The following wells are proposed to reduce their TEH analysis from quarterly to semi-annually: SCIMW-23, SCIMW-24 and SCIMW-34. This is approved. Monitoring of SCIMW-2 for TEH is proposed to be changed from quarterly to annually. Because the TEH results only recently decreased in concentration, you are requested to monitor this well semi-annually. TEH is proposed to be discontinued entirely in wells MW-6, SCIMW-6, SCIMW-11, SCIMW-12, SCIMW-16, SCIMW-19, SCIMW-27 and SCIMW-32. Our office concurs with this with the exception that monitoring should continue annually in MW-6, when free product is removed.
- Our office also concurs with the recommended changes for monitoring of the following parameters: solvents, PNAs, pesticides, lead, heavy metals, and the biological parameters; pH, eH, DO, TDS, and DOC.
- To comply with our office's request to add MTBE analysis to the monitoring program, your consultant proposes to analyze the following wells for MTBE: MW-3, MW-4, MW-5, SCIMW-21, SCIMW-26, SCIMW-29 and SCIMW-34. Any detected MTBE will be confirmed using EPA Method 8260. This is acceptable.

In addition, our office has received a copy of a proposal for Soil Gas and Flux Chamber Testing at this site. I have discussed this proposal with you and Subsurface Consultants. Our office cannot at this time render an opinion on the need or merit of this proposal without additional technical background. However, as you are aware, you may proceed with this investigation without our office's comment. We would, however, like to receive a copy of this report when available.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Ms. J. Alexander, Subsurface Consultants, Inc., 3736 Mt. Diablo Blvd., Suite 200, Lafayette,
CA 94549-3659

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 5/12/2000
1ndd ca's

R02492

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

May 11, 2000
StID #s 3335, 6894, 6895, 225, 5067

Mr. Doug Herman
Port of Oakland Environmental
530 Water St.
Oakland CA 94607-2064

Re: Analysis for MTBE at Ninth Ave. Terminal Site, Oakland CA 94606

Dear Mr. Herman:

In 1997, the Legislature added a provision to chapter 6.75 of division 20 of the Health and Safety Code requiring the testing for MTBE before the Regional Board or local agency can issue a closure letter. On March 26, 1999 Governor Gray Davis signed Executive Order D-5-99 requiring the SWRCB to prioritize MTBE impacted sites to maximize the effort toward resource protection and cleanup. Our office has been requested to classify all MTBE sites and insure that all sites be monitored for MTBE.

Therefore, our office requests that on your next monitoring events for the wells within the location of Buildings H-204, H-209, H-211, H-317 (The Marine Terminal building) and H-213, the Keep on Trucking building, please analyze these wells for MTBE. Please confirm any detectable MTBE concentrations by EPA Method 8260 or an equivalent GC/MS method. Please include these results with your normal semi-annual or quarterly monitoring results. If MTBE is not detected above normal detection limits, it can be eliminated from your monitoring schedule.

Please confirm which wells will be analyzed for MTBE (in addition to their normal analytes) by submitting a list of wells and schedule of their analysis.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Ms. M. Heffes Esq., Port of Oakland Legal, 530 Water St., Oakland CA 94607-2064
Ms. J. Alexander, SCI, 3736 Mt. Diablo Blvd., Suite 200, Lafayette, CA 94549-3659

Mtbe9thAve

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



PORT OF OAKLAND / NINTH AVE
TERMINAL

370 8th. Ave., Oakland.

R0 # 2492

April 16, 1999
StID # 3335

Ms. Michelle Heffes
Deputy Port Attorney
Port of Oakland
530 Water St.
Oakland CA 94607

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

Re: Groundwater Monitoring Report and Proposed Monitoring Schedule for Ninth Ave. Terminal, Oakland CA 94606

Dear Ms. Heffes:

Our office has received and reviewed the March 29, 1999 Groundwater Monitoring Report December 1998 Event for the above site as prepared by your consultant, Subsurface Consultants, Inc. (SCI). In addition to reporting the results of selective monitoring at the above site during December 1998, a revised monitoring plan was provided for our office's review. I have discussed the proposal with Ms. J. Alexander of SCI and have agreed to these specified changes:

- The analysis of the analytes DO, Eh and pH will be discontinued in the laboratory, since these analyses are best performed in the field during groundwater sampling. The actual groundwater conditions are best represented by the field data.
- The analysis of PNAs in unfiltered samples is not necessary since the data does not show any difference in the results for the filtered versus unfiltered samples. This may be due to the insoluble nature of these compounds.
- Similarly, PNAs will also be discontinued in filtered samples from all wells except SCIMW-24. I was informed that this well will is being monitored only to generate enough data to use in a forthcoming risk assessment, not because PNA was being detected in groundwater.
- The analysis of TEH will be reduced from quarterly to semi-annually on wells SCIMW-5,-6,-11,-12 and -35 based on the prior monitoring results.
- The analysis of TVH will be discontinued in MW-5 and SCIMW-11. This change is due to the prior monitoring results and the sufficient data for the forthcoming risk assessment. In addition, BTEX will be discontinued in SCIMW-11. Although SCIMW-11 is a perimeter well, it is located within the tidal zone of the estuary. SCI believes that the flushing action of the tide removes the volatile hydrocarbons, thus explaining why TVH and BTEX, although present up-gradient of SCIMW-11, are not detected in this well.
- The analysis of pesticides in wells SCIMW-6 and SCIMW-23 will be reduced in frequency from quarterly to semi-annually. Prior monitoring has not detected these compounds, however, the area adjacent to these wells is known to have previously stored pesticides.
- The analysis of PCBs in well SCIMW-28 will be discontinued based on prior monitoring results. It is noted, the results of PCBs analyses reported in other monitoring wells was done so as a courtesy of the laboratory, and was never part of the requested analysis. It is believed that PCBs in groundwater is not a concern.

Ms. M. Heffes
Ninth Ave. Terminal, Oakland 94606
April 16, 1999
Page 2.

- The reduction of the analysis of heavy metals from quarterly to semi-annually is proposed because of the prior monitoring results and a sufficient amount of data for the future risk assessment.

The above changes in monitoring may be incorporated in the next monitoring event.

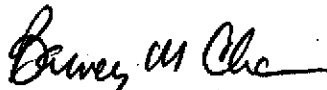
Our office looks forward to the forthcoming human health and ecological risk assessment. I have been informed that the risk assessments have been developed by JSA Environmental. Also included in the risk assessment will be an evaluation of contaminant source areas on the site and a proposed corrective action. It is assumed that an important part of the remediation of the site will include a specific risk management plan.

Please provide copies of the risk assessment to our office and that of the RWQCB to the attention of Mr. Derek Lee as soon as possible. Our office will be requesting the assistance of the RWQCB to review the risk assessment and provide guidance in developing cleanup requirements. We further believe that in order to administer the oversight of the risk management plan, it will be necessary for the RWQCB to issue an order. Therefore, any future correspondences or meetings involving risk assessment or risk management should include representatives from at least both our offices. In addition, if the Port wants to use any of the guidance cleanup levels within the Draft Urban Land Redevelopment Program, the RWQCB will need to confirm that these values are appropriate for this site.

The County will continue to oversee any sites within this area which has been previously transferred to the Local Oversight Program (LOP) and will, when requested, review specific sites within the Ninth Ave. terminal area for closure.

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

Sincerely,



Barney M Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. D. Klettke, Port of Oakland- Environmental Health and Safety Compliance
Mr. J. Redding, Fitzgerald, Abbot & Beardsley LLP, 1221 Broadway, 21st Floor, Oakland
CA, 94612

Mr. L. Griffin, City of Oakland Fire Department, 505 14th St., 7th Floor, Oakland 94612
Mr. D. Lee and Mr. S. Hill, RWQCB, 1515 Clay St., Suite 1400, Oakland CA 94612
Ms. J. Alexander, SCI, 3736 Mt. Diablo Blvd., Suite 200, Lafayette, CA 94549-3659

KOTmonchg

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 2492

September 18, 1998

Ms. Michele Heffes, Esq.
Port of Oakland Legal Department
530 Water St.
P.O. Box 2064
Oakland CA 94607-2064

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

**Re: Work Plan, Groundwater Monitoring Program, Ninth Avenue Terminal Site,
Oakland CA**

Dear Ms. Heffes:

I have received and reviewed the August 5, 1998 work plan referenced above as provided by your consultants, Subsurface Consultants, Inc. (SCI). I have discussed its contents with Ms. Meg Mendoza and Ms. Jeriann Alexander and Ms. Diane Mims formerly of Versar, Inc. Based upon our discussions, a September 16, 1998 Memorandum was prepared by SCI which summarized the items discussed and resolved through conversation with the above individuals. Our office concurs with the seven (7) items mentioned in this memorandum.

Our office would also like to comment on the following items:

- Our office disagrees with the "rationale" that the groundwater concentrations in MW-6 are "relatively stabilized". This is why our office recommended more frequent monitoring and agreed with semi-annual instead of annual monitoring.
- The potential closure of LOP site #3335, the KOT underground tank near H-107, will be based upon the recommended acceptable TPH levels within the newly revised SFIA study. I understand that this revised order may be available soon.
- The rationale for quarterly groundwater monitoring was based on either a well being a perimeter well and analyte selection was at times based upon the presence of a specific analyte in grab groundwater samples from borings near the respective monitoring well. An exception is made for the perimeter wells near the bulkhead where migration is impeded and assumed to be significantly less.
- Although the parameters, pH and Eh, were not noted in the plan for some of the monitoring wells, it was acknowledged that these parameters will be tested in the field for all wells and will appear, at minimum, on the groundwater sampling sheets.
- Care should be taken when referring to the terms "relatively low" concentrations. Because there are inland and shoreline wells, what is considered low in one case may not be low in the other.
- For monitoring well SCIMW-31D, it was noted that in the rationale section, "quarterly for the first year" was in error since semi-annual monitoring was proposed.

Ms. M. Heffes- Port of Oakland
9th Ave. Terminal
September 18, 1998
Page 2.

I understand that this monitoring plan is to be implemented immediately. Please submit a copy of this report within 60 days of the completion of this field work.

Please consider this a formal request for technical reports, pursuant to the Water Code Section 13267 (b) and the Health and Safety Code Sections 25299.37 and 25299.78. The failure to submit the requested document may subject the Port of Oakland to civil liabilities.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Mr. D. Klettke, Port of Oakland, P.O. Box 2064, Oakland CA 94607-2064

Mr. J. Alexander, SCI, 3736 Mt. Diablo Blvd., Suite 200, Lafayette, CA 94549

Mr. J. Redding, Fitzgerald, Abbott & Beardsley LLP, 1221 Broadway, 21st Floor, P.O. Box 12867, Oakland CA 94604-2867

Mr. D. Lee, RWQCB, 1515 Clay St., Ste. 1400, Oakland CA 94612

Mr. Robert Chambers, Alameda County District Attorney Office

Mr. L. Griffin, City of Oakland Fire Department, OES, 505 14th St., 7th Floor, Oakland 94612

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



370 8TH. AVE.
OAKLAND, CA
(LOTS#)
RO# 2492

October 22, 1997
SLIC # 3335

Mr. Jonathan Redding, Esq.
Fitzgerald, Abbott & Beardsley, LLP
1221 Broadway, 21st Floor
Oakland CA 94612

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

**Re: Supplemental Site Investigation Work Plan for Ninth Ave.
Terminal Area, Oakland CA 94606**

Dear Mr. Redding:

This letter serves to comment on the recently submitted September 23, 1997 work plan for the above site as prepared by your consultant, Subsurface Consultants, Inc., SCI. It follows our September 23, 1997 meeting at the County offices where the work plan was discussed and clarified. Our office reviewed the results from the six volume, Third Interim Report and used this information when reviewing the work plan.

The work plan calls for four separate actions plus the issuance of a report of the findings of these actions.

The first task is the investigation of the **Oil-Filled Manhole**. The manhole was identified as a collection area for liquid which includes diesel fuel with similar composition to the diesel fuel from the leaking KOT aboveground tank. The KOT tank was, therefore, initially identified as the sole source of this accumulated fuel. Since then, other potential sources; ie existing and former underground tanks, aboveground tanks, surface releases et al, have been identified as sources which could also account for this fuel. Therefore, a study of the this utility would prove beneficial in determining sources, routes of discharges and provide an estimation of the utility's contribution to the sitewide problem.

The second task is further investigation at the Marine Terminal Corporation (MTC) building. Our office has received a copy of a report signed by Mr. Richard Griffin, Deputy Port Attorney, dated May 6, 1975, which describes the release of approximately 200 gallons of gasoline from the UST on this site. An October 24, 1974 letter from MTC to Mr. Paul Sorensen of the Port, requests approval to install one 7,500 gallon gasoline tank and to convert the existing 1,000 gallon tank from gasoline to diesel. It appears that up to two tanks exist or existed at this site. The Third Interim Report gives the results of soil and grab groundwater samples taken from test pit SCITP-33A through SCITP-33E. Motor oil, diesel and gasoline was detected in these samples. Two monitoring wells downgradient of the tank area and two borings within areas of potential contamination are proposed.

Mr. J. Redding
Ninth Ave. Terminal Area
SLIC #3335
October 22, 1997
Page 2.

This specific work is a reasonable approach to investigate the site. The entire list of analytes requested may not be necessary, however. Only those analytes detected in either soil or groundwater in the SCITP-33 borings need be tested. Two additional borings are proposed adjacent to Building H-309 in surface stained and surface runoff areas. Obviously, this work is not related to underground tank activities but may be useful for further site characterization.

Based on the information presented, a Notice of Responsibility (NOR) for this site (MTC Building H-317) will be sent out in the future. At that time, the site will be transferred to the Local Oversight Program (LOP). For your information, since the County does not have a process to include individual sites under the same identification number, (StID), each site within the "Ninth Avenue Terminal" which identified contamination from an underground tank will be given an individual StID number. You will be copied on all these notification letters.

The third task is to further investigate the **Solvent Area Adjacent to Former Building H-215**. Elevated levels of chlorinated solvents have been detected in soil and groundwater in the general area of boring SCI-55 and monitoring well, SCIMW-7. Assuming the solvent contamination is able to be defined with the three borings proposed, the three wells proposed can be used to verify groundwater concentrations. At this time, the proposed deeper well is not required by our office. Given the type of soils expected and the anticipated depth of the deeper aquifer, there appears to be low risk to the deeper aquifer at this time. Please use professional judgement when analyzing samples for the proposed contaminants eg BTEX may be eliminated when VOCs are run and if soils in borings do not detect an analyte you may forego the analysis in groundwater.

The fourth task is a tidal study which calls for the monitoring of a number of wells, storm drains and man holes close to the Clinton Basin. This information is useful in determining the extent of movement and potential for migration of contaminants in groundwater and through the utilities.

You may proceed with these items as soon as possible. Please contact me at (510) 567-6765 if you have any questions.

Mr. J. Redding
Ninth Ave. Terminal Area
SLIC #3335
October 22, 1997
Page 3.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: Ms. M. Heffes Esq, Mr. D. Klettke, Port of Oakland, Env.
Department, 530 Water St., Oakland CA 94607
Ms. J. Alexander, Mr. J. Rubin, Subsurface Consultants, Inc.,
3736 Mt.Diablo Blvd., Suite 200, Lafayette,
CA 94549
Mr. Richard Padovani, Keep on Trucking, 370 8th Ave., Oakland
CA, 94606
Mr. Micheal Delehunt, Crosby, Heafy, Roach & May, 1999
Harrison St., Oakland CA 94612
Mr. G. Angel Esq., Law Offices of Gary A. Angel, 235
Montgomery St., 25th Floor, San Francisco,
CA 94104
Mr. S. Hill, RWQCB
Bob Chambers, Alameda County District Attorney Office
B. Chan, files
8-KOT

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



370 8TH. AVE.
OAKLAND, CA
(DTSC)

RO# 2492

April 25, 1997
SLIC # 3335.

Mr. Jonathan Redding, Esq.
Fitzgerald, Abbott & Beardsley, LLP
1221 Broadway, 21st Floor
Oakland CA 94612

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

**Re: Site Investigation Work Plan for Ninth Ave. Terminal Area,
Oakland CA 94606**

Dear Mr. Redding:

This letter serves to comment on the recently submitted March 26, 1997 work plan for the above site as prepared by your consultant, Subsurface Consultants, Inc., SCI. It is also a result of our recent, April 21, 1997 meeting at the County offices where you and your consultant clarified a number of the items specified in the work plan. Table A, listing the specific locations, analyses and rationale for the further investigation was also provided for my review.

This letter also addresses the planned work in two questionable areas discussed in our meeting; that within the former Midland-Ross plating facility and that area near the former Britz Chemical Company. I discussed these areas with our in-house toxicologist, Ms. Madhulla Logan and have used her input in my comments and recommendations.

In regards to the former plating facility within building H-232, because it was at one time a permitted TSD facility, jurisdiction for site closure should be clarified through DTSC. Our office is willing to include this facility along with the other areas within the Ninth Avenue Terminal site, however, you should obtain a written statement from DTSC which approves of the County's oversight. Four wells are proposed for this area in addition to sampling two existing wells. Three of the four wells proposed within this area will serve a dual purpose; determining the impact of hexavalent chromium and cyanide to groundwater and secondly determining the extent of petroleum contamination from the KOT (Building H213) area. Our office concurs with the proposed wells, however, to reiterate it would be prudent to have DTSC's approval for County oversight.

In the area of the former Britz Chemical Company, Building H 207, one monitoring well and three test pits are proposed. Our office concurs with this work. In addition, we request that grab groundwater samples be taken from the test pits and filtered through a 0.45u filter prior to analysis for the organic parameters.

Mr. J. Redding
Ninth Ave. Terminal
SLIC #3335
April 25, 1997
Page 2.

I have the following comments to the other bulleted items in SCI's March 26, 1997 letter:

* Bullet item 3 states that since free floating diesel product has been observed in the area of the current aboveground storage tank at KOT, test pits should be excavated to further evaluate the source. This proposal is accepted, however, please insure that all proposed analyses are required. Note that chlorinated pesticides are included in the semi-volatiles 8270 analysis so only one of these methods need be performed. What is your rationale for analyzing for chromium +6 and cyanide?

* Bullet item 4 recommends four borings, one test pit and one monitoring well to evaluate the elevated levels of motor oil and lead at the Lakeside Metals Drum and Metal Storage Area. Elevated motor oil and lead have been found in shallow soils and elevated lead in groundwater in this area. This proposal is acceptable. Note that the heavy metals analysis, EPA series 6000/7000 will include both lead and chromium analysis. Again, what is your rationale for chromium +6 and cyanide analyses?

* Bullet item 5 recommends eight test pits to evaluate the depressed trackage area where saturated petroleum has been observed. This investigation is warranted. Please observe the same precautions for analysis so that duplicative analysis is not performed. Is it reasonable that cyanide and hexavalent chromium could be detected in these areas? As the limits of specific contaminants are delineated, you may forego their analysis beyond these points.

* Bullet item 6 recommends investigation of building H-229, the former fertilizer bagging facility and current hazardous materials storage area for KOT. Four borings and one monitoring well are proposed. Our office has inspected this building and concurs that there is a potential for chemical release, therefore, investigation is warranted. I recommend the borings be located within the building, if possible, rather than outside.

* Bullet item 7 recommends investigation in the area of a former gasoline tank within building H-317. No information is available in this area. One test pit is proposed for soil and groundwater analysis. This is acceptable, however, why are the non-petroleum analytes being requested? (Volatile organics, semi-volatiles, chromium +6 and cyanides).

Mr. J. Redding
Ninth Ave. Terminal
SLIC #3335
April 25, 1997
Page 3.

* Bullet item 8 recommends installation of a well just within Building H-215 since surface staining was observed outside this building. Besides analyzing for the chemicals formerly stored in the building, please analyze for the contaminants detected in the borings and test pits south of building H215.

* Bullet item 9 proposes two borings just south of Building H213 to investigate the surface staining observed in these areas. Just soil samples are needed since three monitoring wells are proposed which surround these two borings.

* Bullet item 10 proposes to advance four test pits to investigate the area along Clinton Basin. A previous test pit detected free petroleum product although TPH has not been detected in nearby monitoring wells. Future site remediation requires knowing the extent of this shoreline petroleum contamination thus this work is warranted.

* Bullet item 11 proposes to investigate the location of a former underground tank where saturated soils were detected. This area is located near former Building H204. A monitoring well will be installed in this area.

* Bullet item 12 proposes to investigate the Cannery Line, which has previously detected petroleum fluids and which may serve as a source for contaminant migration. Since this line is part of the underground utilities it may serve directly or indirectly as a conduit for contaminant migration. The general condition and contents of this line may indicate its likelihood to act as a conduit.

All of the above tasks are reasonable. Our office cannot comment on the exact number of samples nor the entire suite of analytes proposed for testing. Your consultant must exercise professional judgement when performing this work by analyzing only samples which give meaningful information and analyzing only for contaminants with a reasonable likelihood of being present. Further, our office has not received a complete report of the most recent field work, therefore, our background information is incomplete.

Our office requests that further investigation be performed beneath the existing KOT office trailer. The work plan proposal says that that USTs may still exist beneath this area. Contamination and piping has also been detected beneath the building. This area requires further investigation.

Mr. J. Redding
Ninth Ave. Terminal
SLIC #3335
April 25, 1997
Page 4.

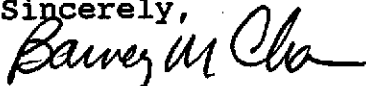
Our office confirms that stated in your April 23, 1997 letter ie as soon as conclusive evidence is provided that releases from underground petroleum hydrocarbon occurred, specific sites will be transferred into the LOP program. However, this will not prevent these sites from being investigated in a sitewide approach. Should a RP request to accelerate closure of their underground tank site, they may choose to perform additional investigation beyond what is currently proposed.

The following information was requested during our meeting:

1. Names and addresses of additional responsible parties for all former or existing underground tanks. Please also inform our office if any of these parties would like to independently investigate their release site.
2. Specific details of the chemical analysis performed in the former plating facility within Building H-232. Additionally, please provide the complete investigation report for the recent field work.
3. Please be reminded that the proper closure of all unpermitted underground tanks remains a priority. The individuals named above (#1) must proceed diligently with closure applications.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

c: Mr. Jeff Rubin and Ms. M. Heffes Esq, Port of Oakland, Env.
Department, 530 Water St., Oakland CA 94607
Ms. J. Alexander, Subsurface Consultants, Inc., 3736 Mt.
Diablo Blvd., Suite 200, Lafayette, CA
94549
Mr. Richard Padovani, Keep on Trucking, 370 8th Ave., Oakland
CA, 94606
Mr. Micheal Delehunt, Crosby, Heafy, Roach & May, 1999
Harrison St., Oakland CA 94612
Mr. S. Arigala, RWQCB
Bob Chambers, Alameda County District Attorney Office
B. Chan, files
7-KOT

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02492
R0106

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

March 25, 1997
STID 3335

ATTN: Mr Jeff Rubin

Port Of Oakland
530 Water St.
Oakland CA 94607

RE: Project # 2140D - Type M
at 370 8th Ave in Oakland 94606

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 \$2,000.00, payable to Alameda County, Environmental Health Services.

We must receive this deposit so that future regulatory oversight on the subject site can proceed in a timely fashion. At the completion of this project, any unused monies will be refunded to you or your designee.

The deposit refund mechanism is authorized in Section 3-140.5 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 on the check to identify your account:

- project #,
- type of project and
- site address

(see RE: line above).

If you have any questions, please contact Barney Chan at (510) 567-6765.

Sincerely,

Tom Peacock, Area Manager
Environmental Protection

c: files/inspector

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



1202492

January 30, 1997
StID # 3335

Mr. Richard Padovani
Keep on Trucking
370 8th Ave.
Oakland CA, 94606

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

**Re: Request for Technical Report for Further Site
Characterization at 370 8th Ave., Oakland CA 94606,
Keep On Trucking and Adjoining Area**

Dear Mr. Padovani:

As you are aware, our office is working with the Port of Oakland and their consultant in an attempt to thoroughly investigate the diesel fuel release from the Keep On Trucking site and adjoining nearby sites. It is unclear at this time how many sources exist for the petroleum hydrocarbon previously detected in the 1992 fuel release to the Oakland estuary. A number of additional potential sources have been identified by the Port as part of their two preliminary investigations and still another additional investigation is being performed at this current time.

Our office has been made aware of an additional site investigation performed in your behalf by R. Morrison & Associates, Inc. in 1996. A map indicating the location of approximately 28 borings was provided to our office. The location of these borings are in areas where analytical data from them could lead to the determination of other potential responsible parties. In addition, further site characterization would also be accomplished. Therefore, our office requests that you submit for our review a copy of the referenced R. Morrison & Associates report. Please submit the report to our office within 30 days or by February 28, 1997.

This is a formal request for technical reports pursuant to the California Water Code and the Health and Safety Code.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

Mr. Richard Padovani
Keep on Trucking
370 8th Ave.
StID #3335
January 30, 1997
Page 2.

- c: Ms. M. Heffes, Port of Oakland Legal Dept., 530 Water St.,
P.O. Box 2064, Oakland CA 94604-2064
- Mr. Jeff Rubin, Port of Oakland, Environmental Department
P.O. Box 2064, Oakland CA 94604-2064
- Ms. J. Alexander, Subsurface Consultants, Inc., 171 12th St.,
Suite 201, Oakland CA 94607
- Mr. J. Redding, Fitzgerald, Abbott & Beardsley LLP, 1221
Broadway, 21st Floor, P.O. Box 12867, Oakland
94604-2867
- Mr. Micheal Delehunt, Crosby, Heafy, Roach & May, 1999
Harrison St., Oakland CA 94612
- Mr. S. Arigala, RWQCB
- G. Jensen, Alameda County District Attorney Office
- B. Chan, files

repKOT