

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02762

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

March 21, 1991

Chuck Jellison  
CWS  
P.O. Box 2419  
San Leandro CA 94577

RE: 2501 Grant Av., San Lorenzo

Dear Mr. Jellison:

Enclosed you will find, as requested, a summary of costs and activities associated with my oversight of your soil remediation project. Please contact me at 271-4320 should you have any further questions.

Sincerely,

Pamela J. Evans  
Hazardous Materials Specialist

Enclosure

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Concrete Wall Sawing Company  
2501 Grant Ave. San Lorenzo, CA

R02762

December 27, 1990

Chuck Jellison  
CWS  
P.O. Box 2419  
San Leandro CA 94577

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

RE: Remediation Proposal by Uriah, Inc. for Hydrocarbon  
Contamination at CWS

Dear Mr. Jellison:

I have reviewed Uriah's Proposal dated December 4, 1990, and have spoken with Gene Painter of Uriah. Mr. Painter informed me that during the week of December 20 he planned to begin the soil remediation at your site by introducing compost into the holding bins. We also discussed the following points:

1. Mr. Painter agreed to provide information on Uriah's qualifications to carry out remediation work.
2. I requested further information about the agent(s) to be used for breakdown of petroleum constituents, how it will be applied, and how the contaminated soil will be managed during the remediation.
3. At a minimum, this office requires a quarterly report of remediation activities, results of any sample analyses, progress made toward clean up, and estimated date of project completion. These periodic reports must be submitted for the duration of the remediation project.

The first quarterly report must be submitted no later than February 1, 1991. Please supply the information requested in items 1 and 2 by that date as well. You may contact me with any questions or concerns at 271-4320.

Sincerely,

Pamela J. Evans  
Hazardous Materials Specialist

c: Richard Hiett, Regional Water Quality Control Board  
Howard Hatayama, California Department of Health Services  
Gene Painter, Uriah, Inc.  
John E. Rapp, Uriah, Inc.

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R02762

November 14, 1990

Chuck Jellison  
CWS  
P.O. Box 2419  
San Leandro CA 94577

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

RE: Hazardous Materials and Waste Issues - 2501 Grant Av.,  
San Leandro

Dear Mr. Jellison:

I have reviewed the Limited Environmental Assessment submitted by Uriah Inc. Recently I have spoken with you and with V. L. Hutchings regarding soil remediation and the current disposition of the sump pit and refuse bin wastes. You stated that your company plans to implement a remediation plan developed by Uriah to bring contaminant levels down. We also discussed the possibility of altering onsite truck cleaning practices in order to lower the concentration of petroleum contaminants in the waste.

The sampling done by Uriah showed that the contents of the refuse bin and sump pit contain levels of total petroleum hydrocarbons (TPH as diesel) as high as 7000 ppm. Total oil and grease (TOG) levels were as high as 15000 ppm. CWS had been disposing of these wastes at the Altamont Dump, which can not accept soils contaminated at these levels. Mr. Hutchings stated that none of the waste has been moved from your site since my inspection in June.

Although it is apparently not your intention to immediately dispose of the waste, I must bring to your attention a recent memo from the California Department of Health Services (DHS) regarding waste classification of fuel contaminated soils. In the past, local agencies that regulate hazardous wastes have used a 1000 ppm TPH hazardous waste action limit for such soils. The DHS memo states that the 1000 ppm criteria can not by itself be used to classify fuel contaminated soils in cases such as yours. Therefore, determining whether your wastes are hazardous or not does not hinge solely on TPH concentration. To properly determine whether your waste is hazardous, you would have to subject it to the waste classification criteria described in Article 11, Title 22, of the California Code of Regulations. If your tested waste were determined to be toxic, ignitable, corrosive, reactive, or otherwise hazardous under the Article, it would be deemed hazardous waste and would have to be treated accordingly.

If your waste were determined to be nonhazardous under Article 11, you would still be faced with the problem of finding a landfill that would be willing to accept high TPH and TOG levels. If you remediate your waste and find a landfill (Class II or III) to accept the material, this office still would need assurance that other common constituents of petroleum fuels, waste oil, and detergents are not

Chuck Jellison  
CWS  
November 14, 1990  
Page 2 of 2

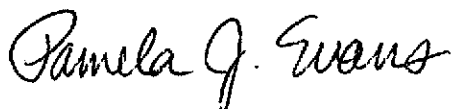
present at hazardous waste levels. Of particular concern would be the presence of heavy metals from waste oil and carcinogenic components of petroleum fuels such as benzene. The waste might also be corrosive due to your use of detergents.

At this point you can simply assume that your waste material is hazardous and proceed accordingly, or you can do further testing pursuant to Article 11 of the California Code of Regulations prior to disposal.

Be aware that you are required to submit copies of remediation proposals to this office for review and acceptance before proceeding. You must also notify this office at least 48 hours in advance of any sampling work. I will expect to receive Uriah's written plan for remediation of the sump and bin contents by November 30, 1990. Any extensions of this deadline must be agreed upon in advance and confirmed in writing. To cover our costs for remediation oversight, CWS must submit a check to this office for \$500, payable to Alameda County.

I strongly urge you to consider alternatives to your current truck cleaning practices that would prevent or decrease detergent, grease, oil and fuel contamination of the soil and concrete wastes you generate. Separating hazardous from nonhazardous waste streams would reduce the overall volume of hazardous waste you generate and would decrease the time and expense associated with disposing of and/or remediating these wastes. I would be most willing to discuss with you any changes in your vehicle handling routine that might lessen contaminant concentrations in your waste. You may contact me with any questions or concerns at 271-4320.

Sincerely,



Pamela J. Evans  
Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney's Office  
Richard Hiatt, Regional Water Quality Control Board  
Howard Hatayama, California Department of Health Services  
Oro Loma Sanitary District

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R02762

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

August 2, 1990

CWS  
2501 Grant Av.  
San Lorenzo CA 94580

**NOTICE OF VIOLATION**

Dear Sirs:

On June 14, 1990, I inspected your premises. During this inspection, I spoke with a shop worker and with Senon Marasigan. Neither of these employees was able to supply adequate information regarding storage, handling, and disposal of hazardous materials and hazardous wastes so that the inspection could be completed. I left a copy of my inspection report with Mr. Marasigan and requested that it be forwarded to a company manager responsible for handling of hazardous materials and wastes. The inspection report specified that the following take place:

1. That information be provided to my office by July 1, 1990 regarding:
  - a. disposal of waste oil, waste solvent, steam cleaning waste, and other hazardous wastes
  - b. storage of waste oil, solvent, and steam cleaning fluid
  - c. transportation of waste steam cleaning fluid
2. That a completed Hazardous Materials Management Plan be submitted to my office within 30 days. A Plan form was left with Senon Marasigan.

On July 10, 1990, I contacted CWS employee V. L. Hutchings and completed the inspection. No representative of CWS had contacted my office in the meantime. Mr. Hutchings has provided additional information regarding storage and disposal of various hazardous wastes generated at your facility. However, the following violations of the Health and Safety Code (HSC) and the California Code of Regulations (CCR) remain unresolved:

1. Section 25505 (a), HSC - No Hazardous Materials Management Plan has been submitted to this office for your business. You are required to complete and submit the Plan to this office by August 15, 1990.

August 2, 1990  
CWS  
2501 Grant Av.  
Page 2 of 3

2. Section 25250.7, HSC - The waste oil and waste parts cleaning solvent, identified as "Stoddard's solvent" have been mixed together and disposed of as a single waste. The above cited section specifies that hazardous waste generators shall not intentionally contaminate used oil with other hazardous wastes. Waste oil so contaminated can not be disposed of under the simplified alternative manifesting procedures outlined in section 25250.8. These procedures exempt waste oil generators from many of the requirements affecting other hazardous waste generators, including the need to supply the transporter with an individual hazardous waste manifest for each load of waste.

Mixing together of these two waste types is to be immediately discontinued. Inform this office, in writing, by August 15, 1990, of your intended procedures for disposing of parts cleaning solvent.

3. Section 25189.5 (a), HSC - Waste steam cleaning sludge is routinely mixed with waste concrete and taken to the Altamont Dump, a Class III sanitary landfill. The hazardous waste regulations apply to waste mixtures formed by mixing any waste or substance with a hazardous waste. The steam cleaning waste sludge contains petroleum hydrocarbons and caustic substances classified as hazardous waste. The sump sludge mixture is therefore presumed to be hazardous waste. It must not be disposed of at a Class II landfill unless sampling of the sludge establishes that it is nonhazardous.

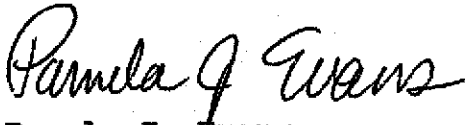
Pursuant to section 66305, CCR, you are required to take the following steps:

- a. Establish total petroleum hydrocarbons (TPH) and total oil and grease (TOG) levels in the sump sludge. Samples must be taken using EPA approved methods.
- b. Submit samples, under chain of custody, to a state certified laboratory for analysis.
- c. Submit sample analysis results to this office.
- d. Remove and dispose of sump sludge appropriately, based on sampling results.

August 2, 1990  
CWS  
2501 Grant Av.  
Page 3 of 3

You are required to submit a plan and timetable for sampling to this office by August 15, 1990. Include the name of the person or organization who will perform the sampling and a description of proposed methods. Once your sampling plan is approved, inform this office at least 72 hours prior to any sump sludge sampling so that a representative of this department can be present. You may contact me with any questions at 271-4320.

Sincerely,



Pamela J. Evans  
Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney's Office  
Lester Feldman, Regional Water Quality Control Board  
Howard Hatayama, California Department of Health Services  
Anthony Cooper, Oro Loma Sanitary District