

PUBLIC INSPECTION OF RECORDS REQUEST

Name: Phonda Richards

Company: Treadwell & Pollo

Address: _____

Phone: _____

Material requested:

- Hazardous Materials related
- Fire Code Permits
- Other _____

Purpose for which access is requested:

Investigating potential sources of GW
contamination, specifically solvents, in
the downtown Livermore area.

Files Requested

Facility Name

Groth Bros
Mill Springs Apartments
East Avenue Cleaners
Mike's One Hour Cleaners
Purity Cleaners
Paul's Sparkle Cleaners
J Cleaners

Facility Address

59 South L Street
1809 Railroad Avenue
4074 East Avenue
1510 First Street
183 N. Livermore Avenue
1332 Railroad Avenue
2093 Railroad Avenue

I understand that there is an \$85.00 per hour charge for file review assistance. The amount of time needed for this request was estimated at _____ hours. I understand that the actual time may be different. I agree to pay the applicable fee within 30 days of receipt of the requested information.

Phonda Richards
Signature

11/02/00
Date

Treadwell & Rollo

Additional files requested for review:

- ✓ 1. Beacon Station - 1619-1st Street
- ✓~~X~~ 2. Groth Bros. Oldsmobile - 59 South L Street
- ✓ 3. Kmart Enterprises - 1122 East Stanley Blvd. *closed files*
4. PG&E Gas Plant - 200 to 375 feet west of N Street @ Railroad Ave. ?
- ✓ 5. Chevron Station - 1334-1st Street
- ✓~~X~~ 6. Mill Springs Park Apartments - 1809 Railroad Ave.

Files requested previously (11/01) for review:

- ✓ 1. East Avenue Cleaners - 4074 East Ave.
- ✓ 2. Mike's One Hour Cleaners - 1516 First St.
3. Purity Cleaners - 183 N. Livermore Ave.
- ✓ 4. Paul's Sparkle Cleaners - 1332 Railroad Ave.
- ✓ 5. J Cleaners - 2093 Railroad Ave.



Ca/EPA

**State Water
Resources
Control Board**

**Division of
Clean Water
Programs**

Mailing Address:
P.O. Box 944212
Sacramento, CA
94244-2120

2014 T Street,
Suite 130
Sacramento, CA
95814
(916) 227-4307
FAX (916) 227-4530

World Wide Web:
<http://www.swrcb.ca.gov/~cwphome/fundhome.htm>



Pete Wilson
Governor

SEP 04 1996

JOSEPH E. BOATRIGHT
15906 ORANGE BLOSSOM RD
OAKDALE, CA 95361

UNDERGROUND STORAGE TANK CLEANUP FUND, CLAIM NO. 011183, FOR
SITE ADDRESS: 1809 RAILROAD AVE, LIVERMORE

The State Water Resources Control Board (State Board) is able to issue, pursuant to applicable regulations, the enclosed Letter of Commitment (LOC) in an amount not to exceed \$100,000. This LOC is based upon our review of the corrective action costs you reported to have incurred to date. The LOC may be modified by the State Board.

It is very important that you read the terms and conditions in the LOC. The State Board will take steps to withdraw this LOC after 90 calendar days from the date of this letter unless you proceed with due diligence with your cleanup effort.

NOTE: You must also submit your first reimbursement request for the costs that you reported to have incurred within 90 calendar days from the date of this letter or submit a **written** explanation as to the status of the cleanup and **when** a reimbursement request can be expected. Failure to submit a request or an approved explanation may result in the removal of committed funds. Claims filed with the Underground Storage Tank Cleanup Fund far exceed the funding available and it is important that you make use of the funding that has been committed to your cleanup in a timely manner.

You are reminded that you must comply with all regulatory agency time schedules and requirements and you must obtain three bids for any required corrective action. Only corrective action costs *required* by the regulatory agency to protect human health, safety and the environment can be claimed for reimbursement. **Unless waived in writing, you are required to obtain preapproval of costs for all future corrective action work (form enclosed).** If you have any questions on obtaining preapproval of your costs or the three bid requirement, please call Patrick Wheeler, our engineer assigned to claims in your Region, at (916) 227-0743. Failure to obtain preapproval of your future costs may result in the costs not being reimbursed.



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Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.

LETTER OF COMMITMENT FOR REIMBURSEMENT OF COSTS

CLAIM NO: 011183

AMENDMENT NO: 0

CLAIMANT: JOSEPH E. BOATRIGHT

BALANCE FORWARD: \$0

CO-PAYEE: NONE

THIS AMOUNT: \$100,000

JOINT CLAIMANT: NONE

5110 4618

NEW BALANCE: \$100,000

CLAIMANT ADDRESS: 15906 ORANGE BLOSSOM RD
OAKDALE, CA 95361

TAX ID/SSA NO: 550-38-4438

Subject to availability of funds, the State Water Resources Control Board (SWRCB) agrees to reimburse JOSEPH E. BOATRIGHT (Claimant) for eligible corrective action costs at ~~WELL SPRINGS PARK APARTMENTS 1809 RAILROAD AVE, LIVERMORE, CA 94550~~ (Site). The commitment reflected by this Letter is subject to all of the following terms and conditions:

1. Reimbursement shall not exceed \$100,000 unless this amount is subsequently modified in writing by an amended Letter of Commitment.
2. The obligation to pay any sum under this Letter of Commitment is contingent upon availability of funds. In the event that sufficient funds are not available for reasons beyond the reasonable control of the SWRCB, the SWRCB shall not be obligated to make any disbursements hereunder. If any disbursements otherwise due under this Letter of Commitment are deferred because of unavailability of funds, such disbursements will promptly be made when sufficient funds do become available. Nothing herein shall be construed to provide the Claimant with a right of priority for disbursement over any other claimant who has a similar Letter of Commitment.
3. All costs for which reimbursement is sought must be eligible for reimbursement and the Claimant must be the person entitled to reimbursement thereof.
4. Claimant must at all times be in compliance with all applicable state laws, rules and regulations and with all terms, conditions, and commitments contained in the Claimant's Application and any supporting documents or in any payment requests submitted by the Claimant.
5. No disbursement under this Letter of Commitment will be made except upon receipt of acceptable Standard Form Payment Requests duly executed by or on behalf of the Claimant. All Payment Requests must be executed by the Claimant or a duly authorized representative who has been approved by the Division of Clean Water Programs.
6. Any and all disbursements payable under this Letter of Commitment may be withheld if the Claimant is not in compliance with the provisions of Paragraph 5 above.
7. Neither this Letter of Commitment nor any right thereunder is assignable by the Claimant without the written consent of the SWRCB. In the event of any such assignment, the rights of the assignee shall be subject to all terms and conditions set forth in this Letter of Commitment and the SWRCB's consent.
8. This Letter of Commitment may be withdrawn at any time by the SWRCB if completion of corrective action is not performed with reasonable diligence.

IN WITNESS WHEREOF, this Letter of Commitment has been issued by the SWRCB this 21st day of August, 1996.

STATE WATER RESOURCES CONTROL BOARD

BY [Signature]
for Manager, Underground Storage Tank Cleanup Fund Program

BY [Signature]
for Chief, Division Administrative Services

STATE USE:
CALSTARS CODING:
0550 - 569.02 - 30530
\$ _____

ALAMEDA COUNTY ENVIRONMENTAL
HEALTH DEPARTMENT

ENVIRONMENTAL PROTECTION DIVISION
1131 Harbor Bay Parkway, Suite #250
Alameda, CA 94502-6577
Telephone (510) 567-6700
Fax Number (510) 337-9335

FAX COVER SHEET

DATE: March, 1996

TO: Cheryl Gordon
UST Clean-up Fund
FAX # (916) 227-4530

Total number of pages including cover sheet _____

FROM: eva chw
Alameda Co. Health Unit

NOTE:
There was no closure summary prepared by this
office. The referenced summary in the RWQCB's
letter is the summary report prepared by
Earth Tech.

(SMILE) have a nice day.
DO SOMETHING FOR OUR ENVIRONMENT.

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION

11/20/95

UNDERGROUND STORAGE TANK CLEANUP SITE

AGENCY#: 10000	SOURCE OF FUNDS: -	INSPECTOR: EC
StID: 4618	SUBSTANCE: -	
SITE NAME: Mill Springs Park Apt		DATE REPORTED :
ADDRESS : 1809 Railroad Ave		DATE CONFIRMED:
CITY/ZIP : Livermore, CA 94550		MULTIPLE RP's :

CASE TYPE:	CONTRACT STATUS:	PRIOR:	EMERGENCY RESPONSE:
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RP SEARCH :		DATE END:
PRELIM ASSESSMENT :	DATE BEGIN:	DATE END:
REMEDIAL INVESTIG :	DATE BEGIN:	DATE END:
REMEDIAL ACTION :	DATE BEGIN:	DATE END:
POST REMED MONITOR:	DATE BEGIN:	DATE END:

TYPE ENFORCEMENT ACTION TAKEN:	DATE OF ENFORC. ACTION:
--------------------------------	-------------------------

UNDERGROUND STORAGE TANK CLEANUP SITE - SCREEN #2

LUFT FIELD MANUAL CONSIDERATION:	CASE CLOSED: on:
----------------------------------	------------------

DT EXC START:	REMEDIAL ACTIONS TAKEN:
---------------	-------------------------

RP #1: CONTACT:	RP COST:
RP COMPANY NAME:	Ph:
ADDRESS:	
CITY/STATE:	

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

StID 4618

October 17, 1995

Mr. James Hardy
Wingfield Venture Fund
125 North Park Avenue
Hinsdale, IL 60521

**RE: Mill Springs Park Apartments (MSP), 1809 Railroad Avenue,
Livermore 94550**

Dear Mr. Hardy:

I have completed review of Earth Tech's October 1995 Final LNAPL Assessment and Groundwater Characterization Evaluation Report and Amendment No. 1 to that report for the above referenced site. Recent investigations at MSP and adjacent upgradient sites have demonstrated that the recent detection of LNAPL and dissolved gasoline constituents in groundwater beneath the MSP site is not related to the prior detection and remediation of soil containing No. 6 fuel oil at the MSP site. It also showed that the MSP site has been impacted by the migration of gasoline contaminated groundwater from an off-site source.

As stated in my letter of April 18, 1995, this office and the SF-RWQCB will not alter the case closure granted on December 24, 1993. The present and future owners of MSP will not be held responsible of any future costs associated with the investigation, characterization, or remediation of the gasoline plume from off-site. However, the owner of MSP should remain cooperative, where practical, with investigations which may be required of the responsible parties of that plume. Therefore, at this time, the monitoring well (MW-1) onsite should not be closed. When it has been determined that the monitoring well does not provide data needed for subsequent investigations, it may then be decommissioned.

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

eva chu
Hazardous Materials Specialist

cc: Mark Milani, Earth Tech, 2030 Addison St, Suite 500,
Berkeley, CA 94704
files (millspr.4)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
80 Swan Way, Rm. 210
Oakland, CA 94621
(510) 271-4300

StID 4618

October 13, 1995

Mr. Jim Hardy
Wingfield Venture Fund
121 E Maple Street
Hinsdale, IL 60521

**Subject: Additional Funds to Complete Case Review of Mill Springs
Park Apartment, 1809 Railroad Ave, Livermore 94550**

Dear Mr. Hardy:

As you know, this office is reviewing reports and overseeing investigations at the above referenced site to determine if the case should be re-opened after significant levels of hydrocarbons have been detected in groundwater recently. However, the initial deposit of \$200.00 has been depleted. To date, since April 17, 1995, approximately 23 hours have been spend in this project. At a rate of \$90/hour, please remit an additional \$2,500.00 to reinstate your account and fund this Office's oversight tasks on your project. Please bare in mind, any and all monies remaining in your account after the completion of the project will be refunded to you.

Please contact me at (510) 567-6762 with any comments on this letter.

Sincerely,

eva chu
Hazardous Materials Specialist

cc: files

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION

10/13/95

UNDERGROUND STORAGE TANK CLEANUP SITE

AGENCY#: 10000 SOURCE OF FUNDS: - INSPECTOR: EC
 StID: 4618 SUBSTANCE: -
 SITE NAME: Mill Springs Park Apt DATE REPORTED :
 ADDRESS : 1809 Railroad Ave DATE CONFIRMED:
 CITY/ZIP : Livermore, CA 94550 MULTIPLE RP's :

CASE TYPE: CONTRACT STATUS: PRIOR: EMERGENCY RESPONSE:

RP SEARCH :		DATE END:
PRELIM ASSESSMENT :	DATE BEGIN:	DATE END:
REMEDIAL INVESTIG :	DATE BEGIN:	DATE END:
REMEDIAL ACTION :	DATE BEGIN:	DATE END:
POST REMED MONITOR:	DATE BEGIN:	DATE END:

TYPE ENFORCEMENT ACTION TAKEN: DATE OF ENFORC. ACTION:

UNDERGROUND STORAGE TANK CLEANUP SITE - SCREEN #2

LUFT FIELD MANUAL CONSIDERATION: CASE CLOSED: on:

DT EXC START: REMEDIAL ACTIONS TAKEN:

RP #1: CONTACT: RP COST:
 RP COMPANY NAME: Ph:
 ADDRESS:
 CITY/STATE:

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF
ENVIRONMENTAL HEALTH
Hazardous Materials Inspection Form

1131 Harbor Bay Pkwy
Alameda CA 94502
510/567-6700

II, III

Site ID # _____ Site Name Mt Springs Park Apt Today's Date 8/11/95

Site Address 1809 Railroad Ave

City Ucarmole Zip 94550 Phone _____

_____ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?

Inspection Categories:

- _____ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
_____ II. Hazardous Materials Business Plan, Acutely Hazardous Materials
_____ III. Under ground Storage Tanks

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments:

On site to collect grab gw samples from 5 borings and one sample from Groth's monitoring well.

Per Mark Milani, at the time of drilling, product was observed in borings H-3 and H-5 and onsite well MW-1. However, no product was detected after borings were left open for 2 days.

Grab GW samples were collected from H-1, H-3, H-5, H-7 and Groth's MW-1. Samples to be analyzed for TPH-G (8015) and BTEX (8020) - MTBE quantification requested.

Earth Tech will also collect sample from onsite well MW-1 and submit a split sample for our lab on Monday (Unable to complete purging of well today)

Contact _____

Title _____

Signature _____

Inspector ECHO

Signature [Signature]

II, III

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

StID 4618

July 7, 1995

Mr. Mark Milani
Earth Tech
2030 Addison St, Suite 500
Berkeley, CA 94704

RE: **Workplan Approval for Mill Springs Park Apartments, 1809
Railroad Ave, Livermore, CA 94550**

Dear Mr. Milani:

I have completed review of Earth Tech's June 9, 1995 Air Monitoring Workplan, and June 29, 1995 Workplan to Support Coordinated Approach to LNAPL Characterization for the above referenced site.

The proposal to characterize the extent and source of LNAPL in the vicinity of the site by advancing borings by the end of N Street, along the Groth property line, and possibly along Railroad Ave (downgradient from well MW-1) to measure LNAPL thickness and collect grab groundwater samples is acceptable.

In addition, the proposal to perform air sampling for BTEX at five locations is acceptable. It was recommended that air monitoring stations AMS-3 and AMS-1 be moved to Buildings 3 and 5, respectively. Air sampling should be performed several times a month, at various time of day (morning, midday, night), and at various temperature fluctuations.

Field work should commence within 30 days of the date of this letter, or by **August 8, 1995**. Please notify me at least 72 hours prior to the start of field activities. If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

cc: Jim Hardy, Wingfield Venture Fund, 121 E Maple Street,
Hinsdale, IL 60521
files (millspr.2)

KH REALTY 2, INC.

P.O. BOX 368 • HINSDALE, ILLINOIS 60522 - 0368 • (708) 325-5907 • FAX (708) 325-5977

✓
ee
7/5

June 28, 1995

Ms. Eva Chu
Alameda County Health Agency
Department of Environmental Health
Hazardous Materials Division
1131 Harbor Bay Parkway, Room 250
Alameda, California 94502

BY FACSIMILE and
U.S. MAIL

RE: LNAPL Characterization
Mill Springs Park
Livermore, California

Dear Eva:

On June 22, 1995, Mark Milani of Earth Tech submitted a proposal for your consideration which defined a concerted program for additional testing relative to the light nonaqueous phase liquid ("LNAPL") detected on the premises of Mill Springs Park apartments. As you are aware, based on conversations between you and Mark, we are now in the process of amending that proposal in order to make it more responsive to the suggestions you have made. I have authorized these submissions because, in my view, it represents a well considered professional approach to the problem. If the parties jointly pursue this strategy to its conclusion it will produce a body of scientific findings that could then be fashioned into an authoritative solution. It is fundamental, however, that in order to gain the benefit of such a result, each of the parties to the undertaking must act with an integrity of purpose. Otherwise, we will once again be forced to content ourselves with limited data from which to attempt to reach an informed decision. The significance of this problem demands a more disciplined result. To that end, we will all benefit from your leadership and objectivity. With your continued involvement and counsel the desired result will be assured.

As you are very much aware, we have a significant financial investment in the Mill Springs Park apartments. Obviously, the value of that investment has been severely impacted by this LNAPL episode. In fact, this property was under contract for its sale when this issue was discovered. As a result of this discovery, we promptly informed the buyer and they have

Ms. Chu
June 28, 1995
Page 2

elected to stop their due diligence program in favour of waiting to see if the problem can, in fact, be resolved. For understandable reasons, therefore, we are very anxious to have this matter resolved at the earliest possible time.

Given the foregoing and the inherent reasonableness of the Earth Tech proposal, I respectfully request your continued consideration of its merits. In addition, please continue your active personal involvement in this case. You bring a history of knowledge and experience concerning the sites and the personalities involved. I am confident that your knowledge of this case will prove to be of significant value to those parties who seek a prompt, certain and professional resolution of this problem.

Very truly yours,

Wingfield Venture Fund
(A California Limited Partnership)
by KH Realty 2, Inc.
(Its Corporate General Partner)



James L. Hardy, President

cc: Mark Milani, P.E.
Managing Senior Engineer
Earth Tech

June 23, 1995

Alameda County Health Agency
Department of Environmental Health
Hazardous Materials Division
1131 Harbor Bay Parkway, Room 250
Alameda, California 94502

687157.08
File: Correspondence

Attention: Ms. Eva Chu

Subject: **Proposed Coordinated Approach to LNAPL Characterization, Mill Springs Park Apartments, 1809 Railroad Avenue, Livermore, California**

Dear Eva:

This letter presents EARTH TECH's proposed approach to coordinate additional characterization to determine the extent and source of a light non-aqueous phase liquid (LNAPL) encountered in the monitoring well at the Mill Springs Park Apartment site in Livermore California. This proposed approach will necessitate partnering between the Alameda County Health Agency, Department of Environmental Health (ACHA-DEH), Mill Springs Park (MSP) and Desert Petroleum Inc. (DP). EARTH TECH has identified the following suggested tasks that each party could perform:

Telephone
510.540.6954
Facsimile
510.540.7496

Desert Petroleum Suggested Tasks

Based on review of Desert Petroleum's March 31, 1995 Soil and Groundwater Investigation for the 2008 First Street site and discussions with you regarding proposed additional field work to be performed by DP, EARTH TECH suggests that the following work be incorporated into DP's Workplan:

- Install a monitoring well at the location of the former Hydropunch location H-2. The monitoring well would be used only for monitoring LNAPL presence and thickness. This is a critical area since free product was encountered at this location; however, the thickness was not determined during the previous investigation. If LNAPL is detected, DP should incorporate this well into their LNAPL removal program.
- One of the three DP proposed Hydropunch locations along First Street (between L and M streets) should use the Hydropunch II method so that an accurate measurement of the LNAPL thickness, if found, can be measured. As an alternate, a monitoring well could be installed to be used only for LNAPL measurement.
- Add an additional Hydropunch (type II) along M street. This Hydropunch

- good suggestion

687157/3/ACHALTR.NOS



should be located midway between the intersection of First Street and M Street and the terminus of M street.

- The three proposed Hydropunch locations (type II) along Railroad Avenue (between L and M streets) should be relocated so that they are spaced equidistant between M Street and O Street. This places these Hydropunch locations downgradient from LNAPL plume. The locations proposed by DP appear too far to the east to encounter the LNAPL plume.
- DP should grant permission for MSP to sample the wells located at 2008 First Street.
- DP should grant permission for MSP to survey the Hydropunch locations and monitoring wells so that a groundwater elevation contour map can be prepared using a common datum.

If LNAPL is detected in any of the Hydropunch sample locations, DP should develop and implement an LNAPL recovery program. Depending on the thickness and extent of the LNAPL found, the recovery program may require a more aggressive approach for product recovery than is currently being utilized by DP.

Mill Springs Park Suggested Tasks

MSP is prepared to perform subsurface investigation to characterize the extent of the LNAPL on the MSP site. The program to be performed by MSP would include the following:

- Perform one Hydropunch (type II) on MSP property by N Street terminus. If LNAPL is found, the boring would be converted to a monitoring well.
- Perform four Hydropunch borings (type II) along the MSP and Groth Brothers Oldsmobile property line. All field work would be conducted on Groth property. MSP has received permission from Mr. Dick Groth, Owner of Groth Brothers Oldsmobile, to perform this work.
- Re-sample the monitoring well located on Groth Oldsmobile property.
- Survey the Hydropunch locations and monitoring well on the Groth site so that a groundwater elevation contour map can be prepared.
- Perform the air monitoring program presented in EARTH TECH June 9,

1995 workplan but amended to relocate one air monitoring station from Building 10 (AMS-3) to Building 3 and one from Building 2 (AMS-1) to Building 5.

- MSP will grant permission for DP to obtain a sample (LNAPL/groundwater) from the well on the Mill Springs site.

All costs for work to be conducted on the Groth site by MSP will be paid for by MSP.

ACHA-DEH Suggested Tasks

In addition to providing regulatory oversight of the work performed by MSP and DP, EARTH TECH suggests the following be performed by ACHA-DEH in order to evaluate other possible sources of the LNAPL.

- There are three other facilities beside the former DP site (now B&C Mini-mart) operating underground storage tanks (USTs) for dispensing gasoline and other automobile fuels within a ¼-mile distance, upgradient of the Mill Springs Park Apartment site. The sites are:

- Unocal Station, 1771 First Street
- Beacon Station, 1619 First Street
- Tri-Valley Tune-up, 1737 First Street

1814-1st St. Livermore may have UST.
The Beacon Station was observed to have at least 8 monitoring wells, both onsite and offsite. No information on the other two sites was obtained from conversations with employees at these facilities during a field reconnaissance performed by EARTH TECH. EARTH TECH suggests that ACHA-DEH review reconciliation/precision tank testing records for the UNOCAL and Tri-Valley Tune-up facilities to determine if releases have occurred from these facilities.

R. Westan will do.

While the Beacon Station appears to have potential groundwater contamination, its location relative to the site and the known groundwater gradient makes this facility an unlikely source of the LNAPL. Discussions with you indicate that the Beacon facility has not reported LNAPL in their monitoring wells.

- ACHA should encourage the full participation and cooperation of Mr. Angle (owner of B&C Mini-mart) during each aspect of this action plan. Participation is considered to include greater access to the site, filing of timely reports and undertaking testing and/or remedial action that may be desirable and supportive to this process.
- ACHA should identify requirements for groundwater remediation that may be required following completion of any LNAPL removal activity that is implemented.

Information obtained by DP, MSP and ACHA-DEH should be shared jointly so that data can be reviewed and a quick resolution achieved. MSP is prepared to consolidate all the data from previous investigations and work proposed herein on a single map that shows the DP site, Groth Olds site and MSP site and surrounding vicinity so that the data is plotted on uniform scale. Copies of this map will be made available to all interested parties for their use and comment.

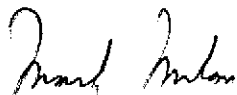
EARTH TECH would like to reiterate that the foregoing suggestions are made with the intent of establishing a coordinated program for the gathering, disseminating and reviewing all necessary and pertinent information needed to develop an effective and efficient course of action.

EARTH TECH will prepare a letter workplan providing additional details and site plan for the work proposed by MSP by June 30, 1995.

If you have any questions, please contact the undersigned.

Sincerely,

EARTH TECH



Mark Milani, P.E.
Managing Senior Engineer

Copies: Mr. Jim Hardy, Wingfield Venture Fund

TRANSMIT REPORT

1995.06-25 11:28
 510 337 9335
 ALAMEDA CO EHS HAZ-CIPS

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
460	510 540 7495	06-25 11:27	00' 48	01/01	OK		

7495402045

Post-It™ brand fax transmittal memo 7671 # of pages > 1

To	M. Milani	From	ewa chw
Co.	Earth Tech	Co.	Alameda Co. LOP
Dept.		Phone #	567-6762
Fax #	540-7496	Fax #	

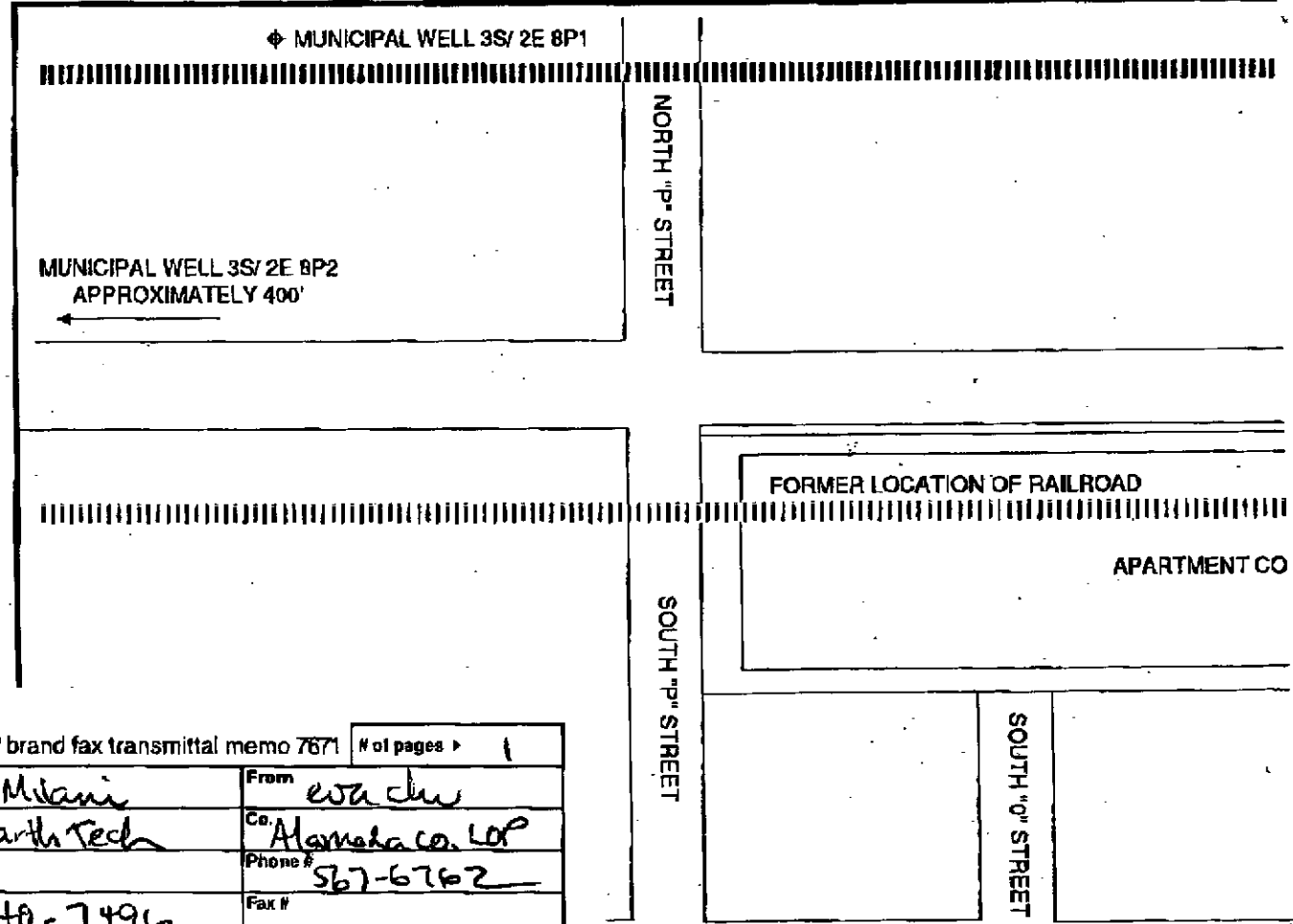
2008 FIRST STREET,
 LIVERMORE, CA 94550

FIGURE 2: VICINITY MAP

LEGEND

- ◆ GROUNDWATER MONITORING OR MUNICIPAL WELL LOCATION
- PROPOSED HYDROPUNCH LOCATIONS

SCALE IN FEET



5/21/95 Jee

ENVIRONMENTAL PROTECTION

95 MAY 18 PM 12:16

May 17, 1995

Alameda County Health Agency
Department of Environmental Health
Hazardous Materials Division
1131 Harbor Bay Parkway, Room 250
Alameda, California 94502

687157.08
File: Correspondence

Attention: Ms. Eva Chu

Subject: Meeting Summary, Mill Springs Park Apartments, 1809 Railroad Avenue, Livermore, California

Dear Eva:

This letter summarizes the key topics discussed at the meeting held on Thursday, May 11, 1995 at your office. Persons in attendance at the meeting were Mr. Jim Hardy, Mr. Steve Tekosky, Mr. Jim Blake, Mr. Mark Milani and Mr. Long Ching. The key topics discussed are identified below:

Telephone
510.540.6954
Facsimile
510.540.7496

- Regulatory history of Desert Petroleum Site (2008 1st Street): A brief overview of the Desert Petroleum site history was given. ACHA-DEH first became involved in 1988 in response to a report soil contamination. ACHA-DEH indicated that Desert Petroleum had sold the site; the current owner is also operating the site as a fuel station under franchise as a BP station.

ACHA-DEH indicated that the USTs are single walled steel tanks. The number and capacity of the USTs were not discussed. The USTs were apparently modified by lining the interior of the USTs. Desert Petroleum's consultant, Remediation Services Inc. (RSI), believes that ongoing releases may be occurring from the USTs; however, this apparently has not been confirmed.

Monitoring of the site is currently being performed by RSI under contract to Desert Petroleum. RSI submitted a recent report summarizing the results of "Hydropunch" sampling. RSI reported that light non-aqueous phase liquid (LNAPL) was encountered in all the borings located along South "L" Street, downgradient from the Desert Petroleum site.

ACHA-DEH also indicated that they are requiring additional work from the Groth Auto Dealership across the street (along South L) from the Desert Petroleum site. ACHA-DEH has also requested assistance from Groth for access to the Groth site by Desert Petroleum.

- Current regulatory action being taken by ACHA-DEH: ACHA-DEH is requiring Desert Petroleum to perform additional characterization of the offsite LNAPL migration from the Desert Petroleum site. Desert Petroleum is to submit a workplan for this additional characterization by May 22, 1995. ACHA-DEH indicated that they would review the workplan submitted by Desert Petroleum immediately upon receipt.

The ACHA-DEH has requested Mill Springs to perform air monitoring for volatile organic compounds (specifically benzene and petroleum hydrocarbons) inside existing structures at the site. EARTH TECH will develop a specific air monitoring plan and submit this plan to ACHA-DEH for review and approval prior to implementation. The plan would be submitted in about two weeks.

- Regulatory timeline: No specific timeline was given regarding completion of investigation and remediation by Desert Petroleum. However, it is anticipated that Desert Petroleum would implement the elements of the Workplan within two weeks of approval by ACHA-DEH. There was some discussion regarding LNAPL removal which could take up to six months to complete once the specific system is approved and installed. A timeline for groundwater remediation was not specifically discussed since the extent of any dissolved petroleum hydrocarbon plume is unknown at this point.
- Other Considerations: ACHA-DEH indicated that Mill Springs would not be considered a responsible party (RP) to the cleanup of the LNAPL. At this time, it appears that the LNAPL has originated from the Desert Petroleum site. Work to be performed by Desert Petroleum will be reviewed by ACHA-DEH to confirm that the Desert Petroleum is the RP.

ACHA-DEH also indicated that should Desert Petroleum fail to complete the cleanup or not perform in a timely manner, that emergency funds are available from the State of California for the ACHA-DEH to perform the cleanup.

Alameda County Health Agency
Department of Environmental Health
Ms. Eva Chu

May 17, 1995
Page 3

If you have any questions, please contact the undersigned.

Sincerely,

EARTH TECH



Mark Milani, P.E.
Managing Senior Engineer

May 11, 1995

Alameda County Health Agency
Department of Environmental Health
Hazardous Materials Division
1131 Harbor Bay Parkway, Room 250
Alameda, California 94502

687157.08
File: Correspondence

Attention: Ms. Eva Chu

Subject: **Agenda Topics for Meeting, Mill Springs Park Apartments, 1809
Railroad Avenue, Livermore**

Dear Eva:

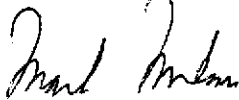
As we discussed on Monday, May 8, 1995, EARTH TECH has prepared a draft agenda for the meeting to be held at your office on Thursday, May 11, 1995 at 3:00 p.m. The proposed Primary agenda topics are identified below:

- Regulatory history of Desert Petroleum Site (2008 1st Street): Brief overview of site usage and when ACHA-DEH became involved in the site.
- Current regulatory action being taken by ACHA-DEH regarding offsite migration from to Desert Petroleum site.
- Regulatory timeline: discussion of how ACHA-DEH plans to approach product removal, groundwater contamination at Desert Petroleum site and offsite impacted areas and when these actions are anticipated to occur.

If you have any questions, please contact the undersigned.

Sincerely,

EARTH TECH



Mark Milani, P.E.
Managing Senior Engineer

ENVIRONMENTAL
 PROTECTION
 95 MAY 12 PM 12:48
 Telephone 510.540.6954
 Facsimile 510.540.7496

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

StID 4618

April 18, 1995

Mr. Mark Milani
Earth Tech
2030 Addison St, Suite 500
Berkeley, CA 94704

RE: Mill Springs Park Apartments, 1809 Railroad Ave, Livermore

Dear Mr. Milani:

This office is in receipt of Earth Tech's April 1995 LNAPL Assessment Report, and a deposit of \$200.00 for the review of the case file for the above referenced site. Upon review of the files, past activities included remedial action to remove soil contaminated with #6 fuel oil and oil and grease. It appears the recent detection of gasoline constituents in free phase in the onsite monitoring well may be from an offsite source.

Case closure was granted by the SF-RWQCB on December 24, 1993, after the onsite well was sampled for two years without detecting elevated levels of TPH or BTEX. A maximum of 4.5 ppb benzene was detected in the past.

At this time, this case will not be re-opened. A potential upgradient source of the gasoline release has been identified. This office will require the responsible party of the site upgradient from Mill Springs Park Apartments to fully delineate the extent of their plume and to assess if their plume has impacted your client's site.

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

eva chu
Hazardous Materials Specialist

cc: Jim Hardy, Wingfield Venture Fund, 121 E Maple Street,
Hinsdale, IL 60521
John Rutherford, Desert Petroleum, P.O.Box 1601, Oxnard.
CA 93032
files

4618

April 11, 1995

Alameda County Health Agency
Department of Environmental Health
Hazardous Materials Division
1131 Harbor Bay Parkway, Room 250
Alameda, California 94502

687157.08
File: Correspondence

Attention: Ms. Eva Chu

Subject: **Transmittal of Closure Letter, Mill Springs Park Apartments, 1809 Railroad Avenue, Livermore**

Dear Eva:

As you requested, EARTH TECH is transmitting a copy of correspondence from the Alameda County Health Care Services Agency, Department of Environmental Health recommending case closure for the Mill Springs Park Apartment Site. We are still reviewing our project files for a copy of the letter from the Regional Water Quality Control Board granting regulatory closure for the subject site.

Telephone

510.540.6954

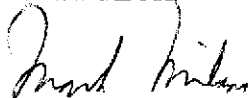
Facsimile

510.540.7496

If you have any questions, please contact the undersigned.

Sincerely,

EARTH TECH



Mark Milani, P.E.
Managing Senior Engineer

Attachments: November 10, 1993 correspondence from ACHA-DEH

- ① should letter of no cert. monitor be sent now or wait until off site source verified?
- ② Find remaining file. look for any depl. ref. sheet - active or closed.

ENVIRONMENTAL PROTECTION
95 APR 12 PM 3:37

687157/3/ACHALTR.NO1

687157 0.5



ENVIRONMENTAL
PROTECTION

95 MAR -3 PM 12:03

March 1, 1995

Alameda County Health Agency
Department of Environmental Health
Hazardous Materials Division
1131 Harbor Bay Parkway, Room 250
Alameda, California 94502

687157.08
File: Correspondence

Attention: Mr. Robert Weston

Subject: **Notice of Floating Product during Abandonment of Monitoring Well,
Mill Springs Park Apartments, 1809 Railroad Avenue, Livermore**

Dear Mr. Weston:

This letter confirms our telephone conversation of February 24, 1995. As discussed, EARTH TECH attempted to abandon the monitoring well at the Mill Springs Park Apartment site located in Livermore, California on February 23, 1995. Upon opening the well, a petroleum hydrocarbon odor was detected. EARTH TECH's field engineer then removed the dedicated pump from the well, and obtained a water level depth measurement using an electric sounding device and collected a grab groundwater sample using a bailer.

Telephone
510.540.6954
Facsimile
510.540.7496

The depth to water was determined to be 33.10 feet from the top of the monitoring well casing. This depth has been converted to a groundwater elevation and plotted on Figure 1. Figure 1 is a plot of groundwater elevation over time. Table 1 presents the same data in tabular format. The current groundwater elevation is the highest observed groundwater elevation to date. This is believed to be due to the large amount of rainfall received, and subsequent aquifer recharge that has occurred.

When the bailer was removed, floating product was observed. The thickness of the product was estimated to be between 1/4 to 1/2 - inch. The product was visually described as black and appeared more viscous than water. The source of the product and the type of petroleum product (i.e. gasoline, diesel, fuel oil etc.) could not be determined in the field.

This is the first instance where floating product has been detected in the monitoring well. Historically, no dissolved petroleum hydrocarbon (i.e. gasoline, diesel etc.) except benzene has been detected in the monitoring well. The benzene concentration in the groundwater was between 1 and 5 parts per billion (ppb). The results of previous groundwater analyses are summarized in Table 2.

687157/3/FREEPROD.REG

Alameda County Health Agency
Mr. Robert Weston

March 1, 1995
Page 2

A sample of the product was put into a laboratory sample container, placed on ice and transported to a state certified laboratory under chain of custody. The laboratory is currently performing a fingerprint analysis of the product to determine the type of petroleum hydrocarbon.

Since floating product was observed, EARTH TECH ceased further well abandonment and closed and secured the monitoring well.

EARTH TECH will transmit the results of the fingerprint analyses and a letter workplan addressing proposed investigation by March 17, 1995.

If you have any questions, please contact the undersigned.

Sincerely,

EARTH TECH



Mark Milani, P.E.
Managing Senior Engineer



Charles Cornstock, R.G., C.E.G.
Vice President and Manager, Berkeley Office

cc: Wingfield Venture Fund, c/o Mr. Jim Hardy

Attachments: Figure 1 - Groundwater Elevation Over Time
Table 1 - Observed Groundwater Elevations
Table 2 - Summary of Groundwater Analytical Results

687157/3/FREEPROD.REG

Table 1
Observed Groundwater Elevations
(Mean Sea Level Datum)

*General interval
~ 448 - 410'*

Date of Observation	Groundwater Elevation (feet)
April 19, 1989	433.58
May 1, 1989	434.34
August 1, 1989	433.22
September 1, 1989	431.73
November 2, 1989	430.69
February 2, 1990	431.72
May 2, 1990	434.50
March 6, 1991	436.93
May 2, 1991	438.13
August 7, 1991	424.39
November 5, 1991	418.93*
February 21, 1992	418.91*
May 4, 1992	423.71
February 12, 1993	426.16
May 4, 1993	438.76
February 23, 1995	445.08

* Elevation at bottom of screened casing; groundwater elevation is at or below this point

u
within screened interval

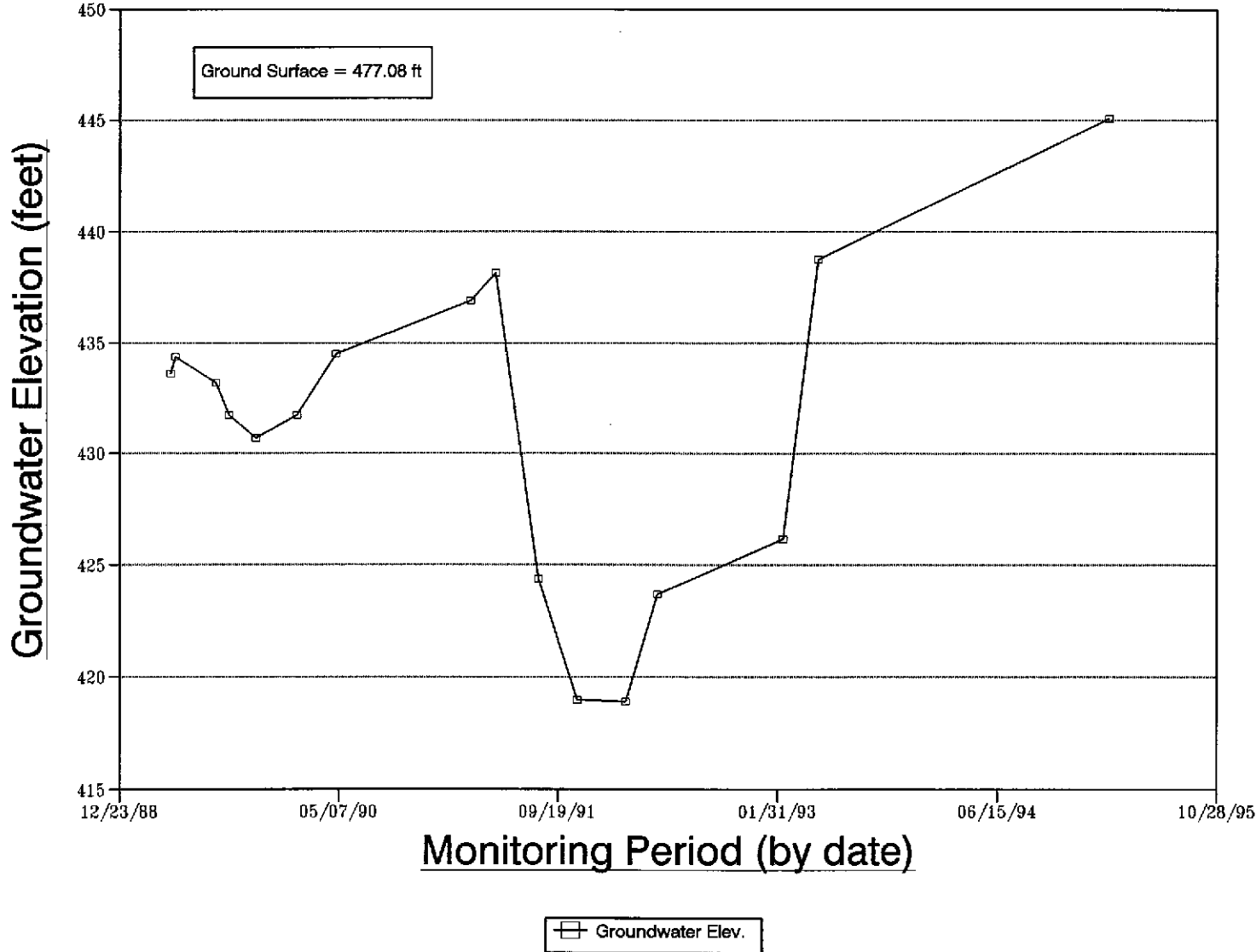
Table 2
Summary of Groundwater Analytical Results

Sample Date	TPH (mg/l)	Benzene (μ g/l)	Toluene (μ g/l)	Ethylbenzene (μ g/l)	Xylene (μ g/l)	TPH Analytical Method
5/2/89	ND	ND	ND	ND	ND	EPA 8015
8/1/89	ND	5	ND	ND	ND	EPA 8015
9/1/89	ND	ND	ND	ND	ND	EPA 8015
11/3/89	ND	3.6	ND	ND	ND	EPA 8015
2/5/90	ND	4.5	ND	ND	ND	EPA 8015
5/2/90	ND	ND	ND	ND	ND	EPA 8015
3/6/91	NA	2.8	ND	ND	ND	---
5/2/91	NA	2.0	ND	ND	ND	---
8/7/91	NA	ND	ND	ND	ND	---
11/5/91	NS	NS	NS	NS	NS	---
2/21/92	NS	NS	NS	NS	NS	---
5/4/92	NA	ND	ND	ND	ND	---
2/12/93	ND	ND	ND	ND	ND	EPA 418.1
5/4/93	ND	ND	ND	ND	ND	EPA 418.1

Notes:

1. ND = Not Detected above Method Detection Limit
2. NA = Not Analyzed
3. NS = Not Sampled (groundwater level below bottom of well casing)
4. EPA 8015 analyses included analyses for gasoline, diesel, kerosene and heavier petroleum hydrocarbons. No constituents were detected above the method detection level
5. BTEX compounds analyzed by EPA Method 8020

Figure 1
Groundwater Elevation Over Time



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

November 10, 1993

Mr. Sumadhu Agrigala
Water Resource Engineer
Regional Water Quality Control Board
2101 Webster Street, 4F
Oakland, CA 94612

**Re: RECOMMENDATION FOR CASE CLOSURE OF THE MILL SPRINGS PARK
APARTMENTS LOCATED AT 1809 RAILROAD AVENUE, LIVERMORE, CA
94550**

Dear Mr. Agrigala:

I am in receipt of the final site closure report dated September 14, 1993, submitted by The Earth Technology Corporation. A thorough review of the report shows that BTEX levels have been ND or below detectable limits for the past four groundwater samplings. It is our opinion that the above mentioned site no longer poses a health threat. Therefore, I am recommending no further cleanup activity at this time.

If you have any further questions regarding this site, please feel free to contact me at (510) 271-4320.

Sincerely,

Jeff Shapiro
Hazardous Materials Specialist

C: Mark Milani, The Earth Technology Corp.
Eric Carlson, Livermore Fire Department
Ariu Levi/ Ed Howell

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

July 7, 1993

Mr. Mark Milani, P.E.
Project Manager
The Earth Technologies Corporation
2030 Addison Street, Suite 300
Berkeley, CA 94704

Re: MILL SPRINGS APARTMENTS, 1809 RAILROAD AVE., LIVERMORE

Dear Mark:

Per our conversation on July 7, 1993, a final closure report will be required for Mill Springs Apartments before a recommendation for closure letter is submitted to the Regional Water Quality Control Board (RWQCB). I inquired with my staff as to the financial status of the Mill Springs account. Apparently, the account was closed in 1989.

Therefore, I am requesting that a minimum deposit of \$225, for 3 hrs. of work, be submitted to Alameda County Hazardous Materials Division before any further work is performed. If you or the property owner have any further questions, please contact me at (510) 271-4320.

Sincerely,

A handwritten signature in cursive script that reads "Jeff Shapiro".

Jeff Shapiro
Hazardous Materials Specialist

2030 Addison Street, Suite 500
Berkeley, California 94704
Telephone: (510) 540-6954 / Fax: (510) 540-7496

December 18, 1992

Mr. Jeff Shapiro
Alameda County Health Agency
Division of Hazardous Materials
80 Swan Way, Room 200
Oakland, CA 94621

87157.7

File: Correspondence

Subject: Regulatory Position on Closure of Monitoring Well, Mill Springs Park Apartments,
1809 Railroad Avenue, Livermore, California

Dear Mr. Shapiro:

This letter is written to confirm the telephone conversation on December 10, 1992 between Mr. Mark Milani with The Earth Technology Corporation (Earth Technology - formerly Aqua Resources Inc.) and Mr. Ravi Arulanamth and Mr. Jeff Shapiro with the Alameda County Health Agency, Division of Hazardous Materials (ACHA-DHM) for the administrative record. The purpose of the call was to discuss the June 4, 1992 groundwater monitoring report and Earth Technology's request for site closure.

Mr. Milani summarized what Earth Technology had observed during the two year monitoring program, and explained that sampling the monitoring well between September, 1991 and March, 1992 was not possible since the regional groundwater level had dropped below the bottom of the monitoring well casing. The drop in the regional groundwater table occurred because the California Water Service and PG&E both had groundwater supply wells that they had put back into service during this period. This caused a temporary local depression in the groundwater table.

Mr. Milani also emphasized that the last two groundwater samples collected were at non detect (ND) levels for benzene. This was the basis for requesting well closure.

Mr. Arulanamth responded that the Regional Water Quality Control Board (RWQCB) has a policy of requiring four consecutive NDs before accepting closure of a site where groundwater has been impacted. In addition, the Mill Springs Park Apartment site is located in a critical groundwater basin that is used for the drinking water supply. Because this is a very sensitive area, the RWQCB will not accept closure of the monitoring well until it can be demonstrated that groundwater has not been impacted.

Mr. Arulanamth indicated that the ACHA-DHM could not recommend closure to the RWQCB until there are at least four consecutive intervals where benzene is at non detect. ACHA-DHM emphasized that the benzene concentration must be below the 0.5 ppb mdl for four consecutive analyses. If benzene is detected above the mdl and above the Maximum Contaminant Level (MCL) for benzene (1 ppb), further groundwater monitoring will be required until the above requirement is met.

ACHA-DHM stated that two additional rounds of groundwater sampling should be performed on a quarterly basis with the last sample round also analyzed for total petroleum hydrocarbons (TPH) and for volatile organic compounds (VOCs - benzene, toluene, xylene and ethylbenzene). If the two additional sampling intervals show VOCs and TPH at non detect levels, then an amended report could be submitted requesting closure. The report will then be reviewed by the ACHA-HMD and by the RWQCB.

If you have any questions, please contact the undersigned.

Sincerely yours,
THE EARTH TECHNOLOGY CORPORATION
formerly Aqua Resources Inc.



Mark Milani, P.E.
Project Manager

MM/blw

cc: Mr. Jim Hardy, KH Realty 2, Inc.

90 DEC 38 AM 10:33



aqua
resources
inc.

2030 Addison Street, Suite 500 • Berkeley, California 94704 • 415 540-6954

December 26, 1990

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

87157.7
file: correspondence

Attention: Mr. Lowell Miller

Subject: Response to Letter Dated November 15, 1990
Mill Springs Park Apartments (Formerly Livermore Superblock)
1809 Railroad Avenue, Livermore, California

Dear Mr. Miller:

This letter responds to your letter dated November 15, 1990 regarding the appeal to discontinue the second year of groundwater monitoring at the subject site. There were several statements made in your letter that we feel need to be clarified:

- You stated in the letter that different analysis methods were used so that the data presented for the different analyses are not directly comparable. Although the analysis reports show analyses using either EPA Method 8020 or Method 602, all the analyses were performed using the EPA Method 8020. This is documented in a letter from the laboratory that performed the analyses. A copy of this letter is attached for your reference. Hence, the conclusion that the data is not comparable is not correct. *OK but not clear*
- Your second comment relates to sampling precision. As part of our sampling procedure, six casing volumes were purged from the well, and the well was allowed to recover to the level in the monitoring well recorded prior to purging. The groundwater sample was then collected. Hence, we believe that representative groundwater samples were collected at every sample interval.

The real issue we believe has to do with analytical variability. The precision and accuracy of the analytical method is part of the laboratory's Quality Assurance/Quality Control procedures. In addition, the analytical method also has procedures to address the analytical variability. Hence, we feel that the accuracy and precision issue has been addressed, and we do not see the need to take three samples at each sample interval.

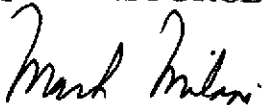
Duplicate samples were taken during the monitoring period but not at every sample interval. ARI also submitted split samples and blind samples during the monitoring period.

- You also stated that the groundwater samples were taken at four different groundwater conditions. The intent of this comment is unclear; but we believe that it refers to the elevation of groundwater in the monitoring well. ARI has no control over natural fluctuations in the groundwater elevation at the site, however, these fluctuations during the sampling period were not significant and would therefore not appear to influence the laboratory results.

ARI still maintains that a second year of groundwater monitoring is non productive. ARI's groundwater monitoring program was designed and performed so that representative groundwater samples were collected to allow measurement of the mutually agreed to chemical properties that are both accurate and precise. In addition, the analytical methods used are sufficiently accurate and precise so that results can be considered to be reliable estimates of the actual chemical properties of the groundwater. We request that you re-evaluate your recommendation to the RWQCB, taking into consideration the above comments.

If you have any questions regarding the above, please do not hesitate to contact the undersigned.

Very truly yours,
AQUA RESOURCES INC.



Mark Milani, P.E.
Project Manager

87157.7/disk 1/waivrrep.ltr

Attachments: Letter From Curtis & Tompkins

cc: Mr. Ed Saub, Wingfield Companies

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

1800 HARRISON STREET, SUITE 700
OAKLAND, CA 94612

Phone: Area Code 415

464-1255



90 DEC 33 PM 1:52

Date: December 28, 1990

File No.: UGT (RAD)

Mr. Mark Milani
Project Manager
Aqua Resources
2030 Addison Street
Berkeley, CA 94704

SUBJECT: Mill Springs Park Apartments
1809 Railroad Ave, Livermore, CA 94550

Dear Mr. Milani:

Board staff has reviewed your November 5, 1990 report and a November 15, 1990 letter from Alameda County Health Care Services regarding groundwater monitoring at the above site. We agree with the County that **you should continue monitoring for benzene**. At least two years of quarterly data is required using Method 602 analysis. At the end of that time period, we will evaluate if additional work needs to be done or if the case can be closed.

Please contact Rico Duazo at (415) 464-0837 if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Lester Feldman'.

Lester Feldman
Section Leader

cc: Lowell Miller
Alameda County Health Care Services

November 15, 1990

Mr. Mark Milani
Project Manager
Aqua Resources
2030 Addison Street
Berkeley, CA 94704

Subject: Mill Springs Park Apartments
1809 Railroad Ave, Livermore, CA 94550

Dear Mr. Milani:

We have reviewed your November 5, 1990 request to discontinue a second year of groundwater monitoring at the above site. As you requested we will be sending a copy of this letter and your November 5, 1990 report to the San Francisco Regional Water Quality Control Board for their final review or "sign-off". Our recommendation to the Board is that you continue monitoring for benzene at the site until you have three measurements taken under similar conditions. This may be achieved in a period of several months (provided measurements are taken at least one day apart) or over several years if quarterly measurements are to be used. The rationale for this recommendation are discussed below.

The benzene concentrations were reported as follows:

Date of Laboratory Report	Method 8020	Method 602
5/10/90	N.D.	
8/08/90	5	
9/13/90	N.D.	
11/13/90		3.6
2/15/90		4.5
5/7/90	N.D.	

Examination of these results indicates the following:

1. Different methods were used in comparing data; consequently the data so

obtained are not comparable. Method 8020 is more commonly used for soil and solids analysis.

2. The results using method 8020 are ambiguous. Since only one measurement was taken during each quarter, it is not clear whether a repeat measurement would yield different conditions. It is impossible to make a determination regarding precision and accuracy of an environmental sample based on a single measurement. The data collected was taken during 4 different groundwater conditions. In order for there to be meaningful data, methods of precision and accuracy as discussed in Method 104 of Standard Methods for the Examination of Water and Wastewater as prepared by the American Public Health Association, American Water Works Association, and the Water Pollution Control Federation. Reasons for collecting more than one sample and the inadequacy of relying on a single measurement are discussed there. There is also a similar discussion of the proper treatment of data in EPA's publication SW-846, 3rd Ed.
3. Method 602 showed significant concentrations during the two times it was used.

Alameda County would therefore recommend that a minimum of three samples under approximately similar groundwater conditions be taken so that the precision and accuracy of the results can be ascertained. This recommendation is standard practice for all chemical sampling and analysis work and is of particular value in field applications where there are more sources of error than is usually encountered in more controlled situations.

If you have any questions on this matter, please contact me.

Sincerely,

Lowell J. Miller
Senior Hazardous Materials Specialist

cc: Lester Feldman
San Francisco Regional Water Quality Control Board



Curtis & Tompkins, Ltd., Analytical Laboratories, Since 1878

2323 Fifth Street, Berkeley, CA 94710, Phone (415) 486-0900

AQUA RESOURCES, INC
RECEIVED

DEC 07 1990

December 5, 1990

Mr. Dewey Burbank
Aqua Resources, Inc.
2030 Addison Street
Berkeley, CA

JOB NO. 87157.7
FILE 8715 (Luccipond)

SUBJECT: Analytical Data; Mill Spring Apartment Project,
1899 Railroad Avenue, Livermore

Dear Mr. Burbank:

This letter is in response to your question regarding method references on Curtis & Tompkins laboratory certificates. All analyses performed by this laboratory for purgeable halocarbons and purgeable aromatics in support of your Livermore project have been conducted in accordance with EPA Methods 8010 and 8020, respectively (Test Methods for Evaluating Solid Waste, SW-846, Third Edition, 1986). Those methods are applicable for all matrices including soil, waste, effluent, and groundwater. We had previously reported method references for water samples on the above analyses as EPA 601 and 602, respectively, although all analyses have, in fact, been done following exactly the same procedures as outlined in EPA 8010/8020.

If you have any further questions, please feel free to call.

Sincerely,


John Goyette
Operations Manager

*Benzene .2 ug/L - 602
purge & trap*

*8020 - could be purge & trap
not specified det. limit .2*

November 21, 1990

Mr. Lester Feldman
San Francisco Regional Water Quality Control Board
1800 Harrison Ave.
Oakland, CA 94621

Dear Lester:

Attached is a copy of a letter from the Alameda County Health Department and a groundwater report from Aqua Resources, Inc. asking for an appeal of our decision. We are forwarding this letter as requested by Mr. Milani.

If you have any questions, please contact me.

Sincerely,

Lowell J. Miller
Senior Hazardous Materials Specialist

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415) 271-4320

April 24, 1989

Mr. Larry Malcolm
Barnett-Range Corporation
P. O. Box 8189
Stockton, CA 95208-1489

SUBJ: MILL SPRINGS PARK APARTMENT SITE

Dear Mr. Malcolm:

We have reviewed the reports submitted by Aqua Resources, Inc. regarding the above-mentioned site. The site was formerly the location of railroad tracks used by Southern Pacific Railroad. The site contained underground fuel tanks and vaults containing mostly fuel oil No. 6. The tanks have since been removed and the soils tested for PCBs, metals, total oil and grease, and benzene, toluene, xylene, and ethylbenzene.

The soils in the vicinity of the tanks showed 0.1 - 2.0% total oils and greases which would be expected of fuel oils. The contaminated soils were used on site as a subbase for paved areas in conformance with Regional Water Quality Control Guidelines (RWQCB). Results of data submitted to the RWQCB indicated no toxicity based on a standard fish toxicity test, PCB analyses and heavy metal analyses. Based on these results, the RWQCB allowed an exemption to their on-site disposal regulations.

A monitoring well has been installed on the property to determine if there would be any effect of the oils on the groundwater. The well is to be analyzed for TPH (EPA Method 530), BTX & E, and TOG (503E) and results submitted to this office quarterly. The well is not to be destroyed without approval from this office.

Based on the above information submitted to this office, no further remediation is needed at this time. Please be aware that this does not free present or future landowners from responsibilities related to future cleanup of this site in the event that new information indicates a pollutant problem on the site or originating from the site.

Mr. Larry Malcom
RE: Mill Springs Park Apt.
April 24, 1989
Page 2 of 2

If you have any questions on this matter, please contact Lowell Miller of this office at 415/271-4320.

Sincerely,

Rafat A. Shahid

Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:LM

cc: Howard Hatayama, DHS
Lisa McCann, RWQCB

ERIC Carlson, L Wernmore Fire

\$75.00

LIVERMORE FIRE DEPARTMENT

4550 EAST AVENUE

LIVERMORE, CALIFORNIA 94550

ADMINISTRATION
Phone: 449-4000

FIRE PREVENTION BUREAU
Phone: 447-2232
373-5450

BUREAU OF FIRE PREVENTION
APPLICATION FOR PERMIT

PERMIT # 89-015

Etter Construction

555 Pilgrim Drive, Suite B Foster City, CA 94404 (415)-570-4624

Business Name	Address	City	Phone
Randy Etter	601 San Clemente	Foster City, CA 94404	415-345-4342
Applicant's Name	Address	City	Phone

PERMIT REQUIREMENTS

TO INSTALL FLAMMABLE OR COMBUSTIBLE LIQUID TANKS, ABOVEGROUND, OUTSIDE OF BUILDING
IN ACCORDANCE WITH 1985 UFC ARTICLE 79 DIVISION V

SECTION I. INFORMATION REQUIRED

Inspection Applicant is required to furnish the following information before
Date/By a permit may be processed.

1. Site plan showing number, location, and capacities of tanks; details of vent pipe system, vapor recovery system, and location of Pump Master Shut-Off Switch. *hand pump*
2. Specify the type of liquid to be stored in each tank.
500 Gallons Diesel
3. Make, model, and serial number of console, dispensers, and/or pressure pumps.

SECTION II. REQUIREMENTS AND LIMITATIONS

Issuance of permit subject to compliance with the listed requirements and approval by field inspection and necessary tests:
THESE REQUIREMENTS TO BE ON PREMISES AT ALL TIMES.

1. Tanks shall be listed by a nationally recognized testing agency (UL, API, ASME). The serial number shall be inspected by the Fire Prevention Bureau before the tank is covered. (UFC 79.105 (a)) Serial No. of Tank(s) UL Approved
2. For location of tanks with respect to property lines, public ways and important buildings on the same property see U.F.C. Tables 79.503 -A, B, C, & D. (1985 U.F.C. 79.503 (a))

RECEIVED FEB 7 1989

LIVERMORE FIRE DEPARTMENT

4550 East Avenue
LIVERMORE, CA 94550

(415) 373-5410

LETTER OF TRANSMITTAL

TO

Fire Department
4550 East Avenue
Livermore, CA 94550

DATE <i>7/24/84</i>	JOB NO.
ATTENTION <i>John ...</i>	
RE	

WE ARE SENDING YOU Attached Under separate cover via _____ the following items:

- Shop drawings Prints Plans Samples Specifications
- Copy of letter Change order _____

COPIES	DATE	NO.	DESCRIPTION
<i>1</i>	<i>7/24</i>		<i>PERMIT APPLICATION</i>

THESE ARE TRANSMITTED as checked below:

- For approval Approved as submitted Resubmit _____ copies for approval
- For your use Approved as noted Submit _____ copies for distribution
- As requested Returned for corrections Return _____ corrected prints
- For review and comment _____
- FOR BIDS DUE _____ 19 _____ PRINTS RETURNED AFTER LOAN TO US

REMARKS _____

J. J. ...

COPY TO _____

SIGNED: _____

If enclosures are not as noted, kindly notify us at once.

3. All aboveground storage tanks over 100 gallons (water capacity) permanently installed, mounted, or fixed and used for the storage of Class I, II, or III-A liquids shall bear the label or placard identifying the material therein. (1985 U.F.C. 79.504)
4. Spacing between adjacent tanks:
 - A. Stable liquids shall not be less than set forth in U.F.C. Table 79.505-A.
 - B. Unstable liquids shall not be less than one half ($\frac{1}{2}$) the sum of their diameters. (1985 U.F.C. Section 79.505 (c))
5. Spacing between liquid and L.P.G. tanks see 1985 U.F.C. Section 79.505 (c).
6. Supports, foundations, and anchorage for tanks at grade: tanks shall rest on ground or on foundations made of concrete, masonry, piling, or steel. For tanks above grade: Tanks shall be securely supported. Supports for tank storing Class I, II, or III-A, liquids shall be of concrete, masonry, or protected steel. Single wood timber supports laid horizontally may be used for outside aboveground tanks if not more than 12" high at their lowest point. (1985 U.F.C. Section 79.506 (d))
7. Design of support structure for tanks shall be in accordance with well-established engineering principles of mechanics and shall comply with the building code. (1985 U.F.C. Section 79.506 (d))
8. Where a tank is located in an area that is subjected to earthquakes, tank supports and connections shall be designed to resist damage as a result of such shocks in accordance with the U.B.C. (1985 U.F.C. Section 79.506 (f))
9. Stairs, platforms and walkways shall be of noncombustible construction and shall be designed and constructed in accordance with the U.B.C. (1985 U.F.C. Section 79.507)
10. The area surrounding a tank or group of tanks shall be provided with drainage or shall be diked to prevent accidental discharge of liquid from endangering adjacent tanks, adjoining property or reaching waterways. For specifics see 1985 U.F.C. Article 79, Section 79.508 (a,b,c,d)
11. Each connection to an aboveground tank located below normal liquid level shall be provided with an internal or external control valve located as close as practicable to the shell of the tank. Except for liquids whose chemical characteristics are incompatible with steel, such valves, when external, and their connections to the tank shall be of steel. (1985 U.F.C. Section 79.509)
12. Atmospheric storage tanks shall be adequately vented to prevent the development of vacuum or pressure. (1985 U.F.C. Section 79.510 (a))

13. Every aboveground storage tank shall have some form of construction or device that will relieve excessive pressure caused by exposure fires. (1985 U.F.C. Section 79.510 (b))
14. Each connection to an aboveground tank through which liquid can normally flow shall be provided with an internal or an external valve located as close as practical to the shell of the tank. (1986 U.F.C. Section 79.510 (c))
15. Openings for gaging on tanks storing Class I liquids shall be provided with a vapor-tight cap or cover. Such covers shall be closed when not gaging. (1985 U.F.C. Section 79.509 (b)(2))
16. For top-loaded tanks, metallic fill pipes shall be designed and installed to minimize the generation of static electricity by terminating the pipe within 6" of the bottom of the tank and it shall be installed to avoid excessive vibration. (1985 U.F.C. Section 79.509 (b)(3))
17. Vapor-recovery systems shall be in accordance with 1985 U.F.C. Section 79.912
18. A minimum of one 10BC approved fire extinguisher shall be located within 75' of all dispensing units. (1985 U.F.C. 10.301 (a))

ADDITIONAL COMMENTS AND/OR REQUIREMENTS:

Any changes in plans must be approved by the Fire Prevention Bureau. A final inspection and approval thereof is necessary before a permit to operate this system will be issued. (4.103 & 4.104 U.F.C.)

Fire Prevention Bureau must be notified 24 hours ahead of time for any tests or inspection. (4.104 U.F.C.)

To abide by all pertinent provisions of Local and State Statutes. (4.102 U.F.C.)

Application or Permit does not replace any license or permit required by any other agency.

I have read and understand the requirements of this application.

DATE ISSUED 2/24/89

DATE CANCELLED 2/26/90

ISSUED BY [Signature]

[Signature]
Applicant's Signature

24 HOUR NOTICE FOR INSPECTION IS REQUIRED

CALL - 447-2232

ETTER & SON CONSTRUCTION, INC.

555 Pilgrim Drive Suite B
FOSTER CITY, CALIFORNIA 94404
CA LIC #513284

Memo

LETTER

(415) 570-4624

To Livermore Fire Dept.

Date 2-22-89

Subject Diesel

Dear Livermore Fire Dept.,

Enclosed please find a check for \$75.00 and an application for a permit to store diesel above ground at our jobsite called Mill Springs located on 1799 Railroad Ave in Livermore.

If you have any questions, please call me at 415-570-4624. Thanks,

Tonia

Tonia Etter
415-570-4624

P.S. Please let us know when it is approved so we can have Valley Oil ship out the tank of diesel.

Please reply

No reply necessary

SIGNED



2030 Addison Street, Suite 500 • Berkeley, California 94704 • 415 540-6954

January 26, 1989

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

87157.5

Attention: Mr. Lowell Miller

Subject: ~~Amendment to Tank Closure Permit~~
Mill Springs Park Apartments (Formerly Livermore Superblock)
Railroad Avenue between South P and South L Streets
Livermore, California

Dear Mr. Miller:

This letter confirms our January 23, 1989 telecon regarding a small steel fuel oil storage tank encountered during mass grading of the site. As you requested, we have prepared an amendment for the previously approved Final Closure Plan for your review and approval. Results of the chemical analyses performed will be forwarded to your office upon receipt by Aqua Resources Inc. If you have any questions, please contact the undersigned.

If you have any questions regarding the above, please do not hesitate to contact the undersigned.

Respectfully submitted,
AQUA RESOURCES INC.

Mark Milani, P.E.
Project Manager

Enclosure

cc: Addressee

Barnett Range Corporation
Attn: Mr. Larry Malcolm

RECEIVED
JAN 29 1989

HAZARDOUS AND SOLID
WASTE

8. Contact Person for Investigation

Name Mark Milani Title Project Manager
Phone 415-540-6954

9. Total No. of Tanks at facility 1

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

11. State Registered Hazardous Waste Transporters/Facilities

a) Product/Waste Tranporter

Name To be determined EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

b) Rinsate Transporter

Name To be determined EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

c) Tank Transporter

Name To be determined EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

d) Contaminated Soil Transporter

Name _____ EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

12. Sample Collector

Name Mark Milani
Company Aqua Resources Inc.
Address 2030 Addison Street, Suite 500
City Berkeley State CA Zip 94704 Phone 415-540-6954

13. Sampling Information for each tank or area

Tank or Area		Material sampled	Location & Depth
Capacity	Historic Contents (past 5 years)		
Approximately 200-gallon tank, steel construction	Tank was abandoned historic contents unknown	-Tank residue (fluid) -Excavated soil	Tank residue sample from tank Excavated soil -base of tank, depth 3½ feet -composite of excavated soil removed from excavation -base of excavation, depth 12½ to 13½ feet

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

If yes, describe. Tank appears to have leaked from filler pipe - tank body connection

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

If yes, describe. To be provided

16. Laboratories

Name Curtis and Tompkins, Ltd.

Address 2323 5th Street

City Berkeley State CA Zip 94710

State Certification No. 159



aqua
resources
inc.

RECEIVED
DEC 30 1988

December 29, 1988

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

HAZARDOUS MATERIALS/
WASTE PROGRAM

87157.5

Attention: Mr. Lowell Miller

Subject: Exemption from Land Disposal Regulations
Mill Springs Park Apartments (Formerly Livermore Superblock)
Railroad Avenue between South P and South L Streets
Livermore, California

Dear Mr. Miller:

This letter confirms our previous telephone conversation regarding disposal of the soil contaminated with fuel oil at the subject site. As I indicated, we requested and were granted an exemption from the existing land disposal regulations specified in Title 23, Chapter 3, Subchapter 15, Section 2511h of the California Code of Regulations by the California Regional Water Quality Control Board, San Francisco Bay Region. A copy of the letter granting the exemption is attached for your files. As indicated, the contaminated soils will be reused onsite as a subbase material in pavement areas.

Additional contaminated soil needs to be removed from the concrete vault structure location. The additional removal will be performed by the grading contractor selected by Barnett-Range Corporation under ARI supervision. Site grading will be performed concurrently. The additional removal will be performed beginning January 2, 1989; our final closure report will be issued once removal has been completed. We are also in the process of locating the groundwater monitoring well required by the final closure plan.

If you have any questions regarding the above, please do not hesitate to contact the undersigned.

Respectfully submitted,
AQUA RESOURCES INC.

Mark Milani

Mark Milani, P.E.
Project Manager

Enclosure

cc: Addressee

Barnett Range Corporation
Attn: Mr. Larry Malcolm

Regional Water Quality Control Board
San Francisco Region
Attn: Ms. Lisa McCann

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

1111 JACKSON STREET, ROOM 6040

OAKLAND 94607

Phone: Area Code 415
464-1255December 27, 1988
File No. 2199.00(CTS)Aqua Resources Incorporated
2030 Addison Street, Suite 500
Berkeley, CA 94704

Attn: Mr. Mark Milani

SUBJECT: Exemption from Land Disposal Regulations for Mill Springs Park
Apartment Site, Livermore, CA

Dear Mr. Milani:

We have reviewed your 15 December, 1988 submittal requesting exemption from the land disposal regulations for fuel oil contaminated soils at the Mill Springs Park Apartment Site in Livermore. The data demonstrates that the contaminated soils are non-toxic and that ground water is at depth exceeding approximately 32 feet below ground surface. The report verifies that the contaminated soils will be reused onsite and placed in areas where it will be covered by pavement, thus reducing the potential for surface infiltration and subsequent migration of contaminants into ground water.

Based upon the above findings, I find that this site is exempt from the land disposal regulations specified in Title 23, Chapter 3, Subchapter 15, Section 2511h of the California Code of Regulations.

Please be aware that the above exemption to Section 2511h does not free present or future land owners from responsibilities related to future cleanup of pollution in the event that new information indicates a pollutant problem on the site or originating from the site.

If you have any questions, please contact Curtis Scott at (415) 464-0455.

Sincerely

A handwritten signature in dark ink, appearing to read "Steven R. Ritchie", is written over a horizontal line.
Steven R. Ritchie
Executive OfficerAQUA RESOURCES, INC.
RECEIVED

DEC 28 1988

JOB NO. _____
FILE _____



2030 Addison Street, Suite 500 • Berkeley, California 94704 • 415 540-6954

October 13, 1988

Alameda County Health Care Services Agency
Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

87157.5

Attention: Mr. Lowell Miller
Senior Hazardous Materials Specialist

Subject: Analysis of Fuel Oil
Mill Springs Park Apartments
Railroad Avenue, between South "L" and South "P" Streets
Livermore, CA

Dear Mr. Miller:

This letter addresses item 5 in your letter dated September 22, 1988. The additional physical and chemical analyses were performed on the fuel oil. Analytical procedures and results are presented on the attached certified laboratory report. From comparison of the analytical data with published data in the Chemical Engineers Handbook, we believe that the subject fuel oil is an aged No. 6 grade fuel oil. As reported previously in our September 12, 1988 Interim Report, the fuel oil does not contain PCB's above the method detection limits.

We trust this letter provides the information you requested. If you have questions, please call.

Respectfully Submitted,
AQUA RESOURCES INC.

Mark Milani
Mark Milani, P.E.
Project Manager

info in report given on #4 fuel

copies: Addressee (1)
Barnett - Range Corporation (2)
Attention: Mr. Larry Malcolm

Attachment: Certified Laboratory Report



2030 Addison Street, Suite 500 • Berkeley, California 94704 • 415 540-6954

October 11, 1988

Alameda County Health Care Services Agency
Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

87157.5

Attention: Mr. Lowell Miller
Senior Hazardous Materials Specialist

Subject: Response to Agency Comments
Mill Springs Park Apartments
Railroad Avenue, between South "L" and South "P" Streets
Livermore, CA

Dear Mr. Miller:

This letter is written on behalf of our client, Barnett-Range Corporation, in response to your letter dated September 22, 1988 regarding the subject project. Item 1 in your September 22, 1988 letter refers to the completed closure form. Barnett-Range Corporation previously completed the City of Livermore Underground Tank Removal Permit application and forwarded the completed form to Mr. Eric Carlson, Deputy Fire Marshall for the City of Livermore. The permit application included the Alameda County Department of Environmental Health, Hazardous Materials Division closure form referenced in the September 22, 1988 letter. A copy of the completed closure form is attached to this letter for your reference.

At the time the closure form was completed, a contractor had not been selected. Consequently, items number 6 and 11 were not completed. However, we mutually agreed that this information would be provided to the County after bid review and contract award were completed. In addition, a site safety plan was subsequently developed and presented as attachment D in our October 3, 1988 Final Closure Plan report.

Items 2 through 4 were also discussed in depth in our Final Closure Plan Report. Currently, the chemical analysis for determining the physical and chemical characteristics of the fuel oil (Item 5) are in progress. The data and ARI's interpretation of the results will be forwarded to you upon completion.

We trust this letter provides the information you requested. If you have questions, please call.

Respectfully Submitted,
AQUA RESOURCES INC.



Mark Milani, P.E.
Project Manager

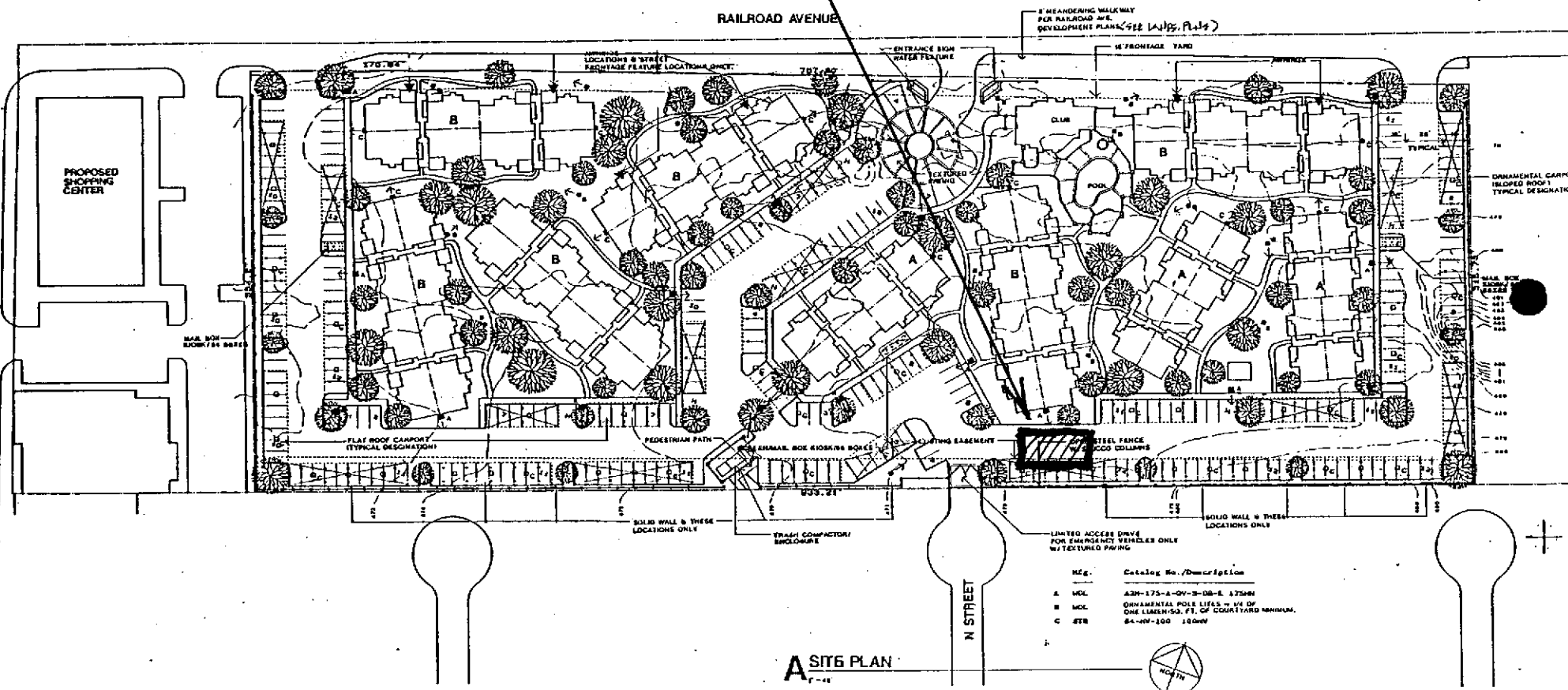
copies: Addressee (1)
Barnett - Range Corporation (2)
Attention: Mr. Larry Malcolm

Attachment: Alameda County Underground Tank Closure/Modification Plans

Underground Tank

EXHIBITION

Project Name:	Exhibition Park Northside	Phase 1	100,000 sq. ft.
Location:	Exhibition Park Northside	Phase 2	100,000 sq. ft.
Owner:	Exhibition Corporation	Phase 3	100,000 sq. ft.
Address:	100 N. 10th St.	Phase 4	100,000 sq. ft.
Site Area:	2.0 Acres	Phase 5	100,000 sq. ft.
Use:	Exhibition	Phase 6	100,000 sq. ft.
Phase 1:	100,000 sq. ft.	Phase 7	100,000 sq. ft.
Phase 2:	100,000 sq. ft.	Phase 8	100,000 sq. ft.
Phase 3:	100,000 sq. ft.	Phase 9	100,000 sq. ft.
Phase 4:	100,000 sq. ft.	Phase 10	100,000 sq. ft.
Phase 5:	100,000 sq. ft.	Phase 11	100,000 sq. ft.
Phase 6:	100,000 sq. ft.	Phase 12	100,000 sq. ft.
Phase 7:	100,000 sq. ft.	Phase 13	100,000 sq. ft.
Phase 8:	100,000 sq. ft.	Phase 14	100,000 sq. ft.
Phase 9:	100,000 sq. ft.	Phase 15	100,000 sq. ft.
Phase 10:	100,000 sq. ft.	Phase 16	100,000 sq. ft.
Phase 11:	100,000 sq. ft.	Phase 17	100,000 sq. ft.
Phase 12:	100,000 sq. ft.	Phase 18	100,000 sq. ft.
Phase 13:	100,000 sq. ft.	Phase 19	100,000 sq. ft.
Phase 14:	100,000 sq. ft.	Phase 20	100,000 sq. ft.
Phase 15:	100,000 sq. ft.	Phase 21	100,000 sq. ft.
Phase 16:	100,000 sq. ft.	Phase 22	100,000 sq. ft.
Phase 17:	100,000 sq. ft.	Phase 23	100,000 sq. ft.
Phase 18:	100,000 sq. ft.	Phase 24	100,000 sq. ft.
Phase 19:	100,000 sq. ft.	Phase 25	100,000 sq. ft.
Phase 20:	100,000 sq. ft.	Phase 26	100,000 sq. ft.
Phase 21:	100,000 sq. ft.	Phase 27	100,000 sq. ft.
Phase 22:	100,000 sq. ft.	Phase 28	100,000 sq. ft.
Phase 23:	100,000 sq. ft.	Phase 29	100,000 sq. ft.
Phase 24:	100,000 sq. ft.	Phase 30	100,000 sq. ft.
Phase 25:	100,000 sq. ft.	Phase 31	100,000 sq. ft.
Phase 26:	100,000 sq. ft.	Phase 32	100,000 sq. ft.
Phase 27:	100,000 sq. ft.	Phase 33	100,000 sq. ft.
Phase 28:	100,000 sq. ft.	Phase 34	100,000 sq. ft.
Phase 29:	100,000 sq. ft.	Phase 35	100,000 sq. ft.
Phase 30:	100,000 sq. ft.	Phase 36	100,000 sq. ft.
Phase 31:	100,000 sq. ft.	Phase 37	100,000 sq. ft.
Phase 32:	100,000 sq. ft.	Phase 38	100,000 sq. ft.
Phase 33:	100,000 sq. ft.	Phase 39	100,000 sq. ft.
Phase 34:	100,000 sq. ft.	Phase 40	100,000 sq. ft.
Phase 35:	100,000 sq. ft.	Phase 41	100,000 sq. ft.
Phase 36:	100,000 sq. ft.	Phase 42	100,000 sq. ft.
Phase 37:	100,000 sq. ft.	Phase 43	100,000 sq. ft.
Phase 38:	100,000 sq. ft.	Phase 44	100,000 sq. ft.
Phase 39:	100,000 sq. ft.	Phase 45	100,000 sq. ft.
Phase 40:	100,000 sq. ft.	Phase 46	100,000 sq. ft.
Phase 41:	100,000 sq. ft.	Phase 47	100,000 sq. ft.
Phase 42:	100,000 sq. ft.	Phase 48	100,000 sq. ft.
Phase 43:	100,000 sq. ft.	Phase 49	100,000 sq. ft.
Phase 44:	100,000 sq. ft.	Phase 50	100,000 sq. ft.
Phase 45:	100,000 sq. ft.	Phase 51	100,000 sq. ft.
Phase 46:	100,000 sq. ft.	Phase 52	100,000 sq. ft.
Phase 47:	100,000 sq. ft.	Phase 53	100,000 sq. ft.
Phase 48:	100,000 sq. ft.	Phase 54	100,000 sq. ft.
Phase 49:	100,000 sq. ft.	Phase 55	100,000 sq. ft.
Phase 50:	100,000 sq. ft.	Phase 56	100,000 sq. ft.
Phase 51:	100,000 sq. ft.	Phase 57	100,000 sq. ft.
Phase 52:	100,000 sq. ft.	Phase 58	100,000 sq. ft.
Phase 53:	100,000 sq. ft.	Phase 59	100,000 sq. ft.
Phase 54:	100,000 sq. ft.	Phase 60	100,000 sq. ft.
Phase 55:	100,000 sq. ft.	Phase 61	100,000 sq. ft.
Phase 56:	100,000 sq. ft.	Phase 62	100,000 sq. ft.
Phase 57:	100,000 sq. ft.	Phase 63	100,000 sq. ft.
Phase 58:	100,000 sq. ft.	Phase 64	100,000 sq. ft.
Phase 59:	100,000 sq. ft.	Phase 65	100,000 sq. ft.
Phase 60:	100,000 sq. ft.	Phase 66	100,000 sq. ft.
Phase 61:	100,000 sq. ft.	Phase 67	100,000 sq. ft.
Phase 62:	100,000 sq. ft.	Phase 68	100,000 sq. ft.
Phase 63:	100,000 sq. ft.	Phase 69	100,000 sq. ft.
Phase 64:	100,000 sq. ft.	Phase 70	100,000 sq. ft.
Phase 65:	100,000 sq. ft.	Phase 71	100,000 sq. ft.
Phase 66:	100,000 sq. ft.	Phase 72	100,000 sq. ft.
Phase 67:	100,000 sq. ft.	Phase 73	100,000 sq. ft.
Phase 68:	100,000 sq. ft.	Phase 74	100,000 sq. ft.
Phase 69:	100,000 sq. ft.	Phase 75	100,000 sq. ft.
Phase 70:	100,000 sq. ft.	Phase 76	100,000 sq. ft.
Phase 71:	100,000 sq. ft.	Phase 77	100,000 sq. ft.
Phase 72:	100,000 sq. ft.	Phase 78	100,000 sq. ft.
Phase 73:	100,000 sq. ft.	Phase 79	100,000 sq. ft.
Phase 74:	100,000 sq. ft.	Phase 80	100,000 sq. ft.
Phase 75:	100,000 sq. ft.	Phase 81	100,000 sq. ft.
Phase 76:	100,000 sq. ft.	Phase 82	100,000 sq. ft.
Phase 77:	100,000 sq. ft.	Phase 83	100,000 sq. ft.
Phase 78:	100,000 sq. ft.	Phase 84	100,000 sq. ft.
Phase 79:	100,000 sq. ft.	Phase 85	100,000 sq. ft.
Phase 80:	100,000 sq. ft.	Phase 86	100,000 sq. ft.
Phase 81:	100,000 sq. ft.	Phase 87	100,000 sq. ft.
Phase 82:	100,000 sq. ft.	Phase 88	100,000 sq. ft.
Phase 83:	100,000 sq. ft.	Phase 89	100,000 sq. ft.
Phase 84:	100,000 sq. ft.	Phase 90	100,000 sq. ft.
Phase 85:	100,000 sq. ft.	Phase 91	100,000 sq. ft.
Phase 86:	100,000 sq. ft.	Phase 92	100,000 sq. ft.
Phase 87:	100,000 sq. ft.	Phase 93	100,000 sq. ft.
Phase 88:	100,000 sq. ft.	Phase 94	100,000 sq. ft.
Phase 89:	100,000 sq. ft.	Phase 95	100,000 sq. ft.
Phase 90:	100,000 sq. ft.	Phase 96	100,000 sq. ft.
Phase 91:	100,000 sq. ft.	Phase 97	100,000 sq. ft.
Phase 92:	100,000 sq. ft.	Phase 98	100,000 sq. ft.
Phase 93:	100,000 sq. ft.	Phase 99	100,000 sq. ft.
Phase 94:	100,000 sq. ft.	Phase 100	100,000 sq. ft.



ALAMEDA COUNTY
HEALTH CARE SERVICE

AGENCY
DAVID J. KEARS, Director



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

Telephone Number: (415)271-4320

September 22, 1988

Mr. Larry Malcolm
Barnett-Range Corporation
P. O. Box 8189
Stockton, CA 95208-1489

SUBJECT: MILL SPRINGS APARTMENT SITE, SOUTH L & P STS., LIVERMORE

Dear Mr. Malcolm:

We have received the report issued by Aqua Resources Inc. dated 9/12/88 concerning the subject site. The site has been found to contain underground pipes and is apparently contaminated with fuel oil, lead, and arsenic in certain areas.

In order for Alameda County to approve the closure of the site under Title 23 regulations, we need the following information:

1. A completed closure form as issued by the Alameda County Department of Environmental Health, Hazardous Materials Div.
2. Further delineation of the vertical and horizontal extent of the oil contamination.
3. Plans for the disposal of the stockpiled oil contaminated material which currently exceed 1,000 ppm oil and grease.
4. The location and type of the monitoring well(s) to be installed, copies of appropriate permits for their construction, parameters to be monitored, and provision for their security from vandalism and destruction.
5. The identification of the type of fuel oil suspected to be causing the contamination problem, its sulfur content by chemical analysis, and other physical and chemical characteristics typical of this type of fuel oil.

Mill Springs Apartment Site
South L & P Sts., Livermore
September 22, 1988
Page 2 of 2

Insofar as this project is anticipated to outrun your \$300.00 initial deposit, we are requesting an additional deposit of \$300 to cover future time requirements by this department. Make your check payable to Alameda County, and specify the name, address and zip code of the site in your correspondence.

If you have any questions concerning this matter, please contact Lowell Miller, Senior Hazardous Materials Specialist at 271-4320.

Sincerely,

Rafat A. Shahid

Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:LM:mam

cc: RWQCB
DOHS
Eric Carlson, Livermore Fire Department

 **Barnett-Range Corporation**
BUILDER/DEVELOPER

September 15, 1988

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

Atten: Lizabeth Rose, Hazardous Materials Specialist
Re: Mill Springs Park Apartments, Livermore
Uniform Hazardous Waste Manifest

Dear Lizabeth:

Please find attached your copy of the Uniform Hazardous Waste Manifest completed for our project. If you require any additional information, please call.

Sincerely,



Larry Malcolm
Project Manager

LM/kas

attch.

SEP 21 1988
Hazardous Waste
1988

#IT 130732

UNIFORM HAZARDOUS WASTE MANIFEST

Generator's US EPA ID No.

Manifest Document No.

CA 09 82480717

101011

3. Generator's Name and Mailing Address

BARNETT-KANGS CORPORATION
 2609 HAMMER LAKE
 STOCKTON, CA 95209

4. Generator's Phone (209) 951-5140

5. Transporter 1 Company Name

IT TRANSPORTATION

6. US EPA ID Number

CA 000 0058917

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

CHEMICAL WASTE MANAGEMENT INC
 35251 OLD SCYLINE BLVD
 KETTLEMAN CITY, CA 93239

10. US EPA ID Number

CA 10101646117

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

a. RQ HAZARDOUS WASTE SOLID NOS (D008)
 ORM-E NA 9189

12. Containers	13. Total Quantity	14. Unit
901	CM	124

15. Special Handling Instructions and Additional Information

CWM1 PROFILE H43217

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

LARRY MALCOLM

Signature

Larry Malcolm

Month Day Year

09 10 18 88

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

198-2692
 GARY RICHARDSON

Signature

Gary Richardson

Month Day Year

09 10 16 88

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

GENERATOR

TRANSPORTER

FACILITY



RECEIVED
SEP 6 1988
HAZARDOUS MATERIALS/
WASTE PROOF

2030 Addison Street, Suite 500 • Berkeley, California 94704 • 415 540-6954
September 2, 1988

Alameda County Health Care Services Agency
Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

87157.5

Attention: Mr. Rafat A. Shahid
Chief, Hazardous Materials Division

Subject: Response to Agency Comments
Mills Spring Valley Apartments
Railroad Avenue, between South "L" and South "P" Streets
Livermore, CA

Dear Mr. Shahid:

This letter is written on behalf of our client, Barnett-Range Corporation, in response to your letter dated August 23, 1988 regarding the subject project. Based on review of your letter, we understand that your staff conducted an inspection of the subject project, and observed several conditions that are in apparent conflict with certain sections of the California Health and Safety Code (H&SC) and the California Administrative Code (CAC), Title 22. The applicable sections of these codes, as given in your letter, are presented below.

1. Section 26189.5 (H&SC) forbids the on-site disposal of hazardous waste.
2. Section 66508 (CAC) requires hazardous waste containers to be labeled.
3. Section 25298 (H&SC) requires closure procedures for underground storage tanks (ie vault).

You also stated that when violations are found and corrections are needed, Section 66328 (d) of CAC, Title 22 requires the owner to submit a Written Plan of Correction, stating the actions to be taken and the expected dates of completion.

First, we do not believe that violation of the above referred code section have intentionally occurred. The stockpiled soil materials do not exceed limits of soil concentration that would classify them as hazardous materials, in our opinion, based on chemical analyses of the soil samples taken every 100 cubic yards of the excavated materials. However, the stockpiles have been fenced off to prevent public access for safety reasons. Materials considered to be hazardous were placed in the metal container. The metal container has been labeled as containing hazardous materials, and will be removed from the site as soon as the required paperwork for disposal has been completed.

The above responds to the first two violations referenced in your letter. Regarding the concrete vault, the historical usage of this structure is unknown at this time. Also, there is no evidence of hazardous liquids placed in this vault. We understand that the City of Livermore Fire Department considers the structure to be as underground storage tank. Because the structure's usage history is unknown, it may be premature to call this structure a tank; nonetheless, the structure will have to be removed in order to facilitate proposed site grading. Consequently, Barnett-Range has completed a tank removal application and received a tank removal permit for this structure. We are also in the process of scheduling a meeting with your office to discuss the Preliminary Assessment, Site Investigation and Final Remediation Plan referenced in your letter. If you have any questions, please call.

Respectfully Submitted,
AQUA RESOURCES INC.



Mark Milani, P.E.
Project Manager

copies: Addressee (1)
Barnett - Range Corporation (2)
Attention: Mr. Larry Malcolm

Mitigation

 **Barnett-Range Corporation**
BUILDER/DEVELOPER

August 30, 1988

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

Atten: Lizabeth Rose
Re: Mill Springs Park Apartments
Livermore, CA

Dear Lizabeth:

Pursuant to your letter of August 23, 1988 please find attached our check #16898 dated August 30, 1988 in the amount of \$300.00. It is our understanding this will serve as a deposit for the Health Agency costs.

If there are any questions, please let me know.

Sincerely,



Larry Malcolm
Project Manager

LM/kas

attch.

Project # 1524595
Fee Paid \$300.00
Date 9-2-88

RECEIVED
AUG 22 1988

LIVERMORE FIRE DEPARTMENT

4550 EAST AVENUE

LIVERMORE, CALIFORNIA 94550

ADMINISTRATION
Phone: 449-4000

FIRE PREVENTION BUREAU
Phone: 447-2232

BUREAU OF FIRE PREVENTION
APPLICATION FOR PERMIT

PERMIT # 88-073

Barnett-Range Corporation 2609 E. Hammer Ln., Stockton (209) 951-5190
Business Name Address City Phone

Same
Applicant's Name Address City Phone

PERMIT REQUIREMENTS
TO REMOVE UNDERGROUND TANKS

In Accordance with 1985 UFC Article 79 Division VI Section 79.114. (a-f)

SECTION I. INFORMATION REQUIRED

Inspection Date/By Applicant is required to furnish the following information before permit may be processed.

One, approx.
22,000 gal.

1. Size and number of tanks to be removed.

to be determined

2. Destination of tank(s).

to be determined

3. Name and address of firm or company doing work if other than applicant.

SECTION II. REQUIREMENTS AND LIMITATIONS

Issuance of permit subject to compliance with the listed requirements and approval by field inspection and necessary tests. The listed requirements are specified in UFC 1985 Edition. THESE REQUIREMENTS TO BE ON PREMISES AT ALL TIMES.

✓ WTH

1. Provide one fire extinguisher with a minimum rating of 20-BC. UFC 10.301.(a)

✓ WTH

2. There shall be no welding or other sources of ignition in the area while abandoning operations are in progress. NFPA Appendix B-1-5

✓ WTH

3. Permits. For permits to remove, abandon, place temporarily out of service or otherwise dispose of any flammable or combustible liquid tank, see Section 4.101. *Fire Code*

✓ WTH

4. Tanks Temporarily Out of Service. Tanks temporarily out of service shall have the fill line, gage opening and pump connection secured against tampering. Vent lines shall remain open and be maintained in accordance with the requirements of this article for vent lines.

✓ WFW

5. Tanks Out of Service 90 Days. Any tank not used for a period of 90 days shall be properly safeguarded or removed in a manner approved by the chief. Tanks which are to be placed back in service shall be tested in a manner approved by the chief. 1985 UFC Article 79

✓ WFW

6. Aboveground Tanks Out of Service One Year. Any above-ground tank which has been abandoned for a period of one year shall be removed from the property in a manner approved by the chief. 1985 UFC Article 79

✓ WFW

7. Underground Tanks Out of Service One Year. Any underground tank which has been abandoned for a period of one year shall be either removed from the ground and the hole properly filled or such tank may be abandoned in place and safeguarded in a manner and with material approved by the chief. 1985 UFC Article 79

✓ WFW

8. Reinstallation of Tanks. Tanks which are to be re-installed for flammable or combustible liquid service shall comply with all of the provisions of this article

ADDITIONAL COMMENTS AND/OR REQUIREMENTS:

Fire Prevention Bureau must be notified not less than 24 hours prior to any necessary test or inspections. UFC 4.104

To abide by all pertinent provisions of Local and State Statutes. UFC 4.102

Contractor Classification To be determined
Contractor License # "
Expiration Date "

Application or Permit does not replace any license or permit required by any other agency.

DATE ISSUED 8/26/88
DATE CANCELLED 9/26/88
ISSURED BY ML LFD

I have read and understand the requirements of this application.

WFW
Applicant's Signature
Project Superintendent
Barnett-Range Corporation

PAID \$150- CHECK # 16882

24 HOUR NOTICE FOR INSPECTION IS REQUIRED - CALL 447-2232

STATE WATER RESOURCES CONTROL BOARD

PAUL R. BONDERSON BUILDING
901 P STREET
P.O. BOX 100
SACRAMENTO, CALIFORNIA 95801
(916) 324-9496



DEC 29 1986

Local Implementing Agencies

SLG-78: LICENSING FOR INSTALLATION AND REMOVAL OF UNDERGROUND STORAGE TANKS

The State Contractors' License Law requires contractors installing or removing underground storage tanks and piping to have one of the following licenses: General Engineering "A", Limited Speciality C-61/D40 for underground storage tanks and pipelines, Pipeline Contractor C-34 for pipelines only, or General Building "B".

General Engineering "A". This license authorizes a contractor to install or remove any type of underground storage tank. In addition, this contractor may install, excavate, or repair any pipes or appurtenances associated with the underground storage tank.

Limited Specialty C-61/D40. This license authorizes the contractor to install or remove service station-type underground storage tanks only. The contractor may also install, excavate, or repair pipelines and other appurtenances associated with these underground storage tanks.

Pipeline Contractor C-34. This license authorizes the contractor to install, excavate, or repair pipelines or other appurtenances only.

General Building "B". A contractor with this license may install or remove the underground storage tanks that are associated with buildings used to house people, animals, or chattels, provided the work is done while constructing or demolishing any part of these buildings. A contractor with this license may install or remove the underground storage tanks of a service station while the building is being constructed. However, the contractor may not install or remove the underground storage tanks after the building is finished.

If you have any questions concerning licensing, please contact the Contractors' State License Board at (916) 366-5206.

Sincerely,

James W. Baetge
James W. Baetge, Chief
Division of Water Quality

RECEIVED
JAN 5 1987

ENVIRONMENTAL HEALTH
ADMINISTRATION

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
470 - 27TH ST., RM. 322
OAKLAND, CA 94612
PHONE NO. 415/874-7237

UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

1. Business Name Barnett Range Corporation
Business Owner Hal Barnett, Jim Range
2. Site Address 1799 Railroad Ave [temp. const. address] ^{U.S. Post Office}
City Livermore Zip 94550 Phone (415) 373-8160 ^{8/31/88}
3. Mailing Address P.O. Box 8189
City Stockton Zip 95208-1489 Phone (209) 951-5140
4. Land Owner Barnett-Range Corporation
Address see above City, State _____ Zip ✓
5. EPA I.D. No. CAD 98-248-0717
6. Contractor To be determined
Address _____
City _____ Phone _____
License Type _____ ID# _____
7. Other (Specify) Agua Resources Inc. (Consultants)
Address 2030 Addison St. Suite 500
City Berkeley Phone (415) 540-6954

8. Contact Person for Investigation

Name Mark Miani Title Project Mgr
Phone (415) 540-6954

9. Total No. of Tanks at facility _____

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 To be determined EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

b) Rinsate Transporter

Name _____ EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

c) Tank Transporter

Name _____ EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

d) Contaminated Soil Transporter

Name _____ EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

12. Sample Collector

Name Agua Resources Inc.
Company " "
Address 2030 Addison St., suite 500
City Berkeley State CA Zip 94704 Phone (415) 540-6954

13. Sampling Information for each tank or area

Tank or Area		Material sampled	Location & Depth
Capacity	Historic Contents (past 5 years)		
Approx 22,000 gal.	Tank was abandoned and filled many years ago. Historic content unknown.	Soil backfill	see enclosed site plan Depth: 3'-0"

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

If yes, describe. No visual leak before excavation of tank

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

If yes, describe. Tank has no top - no volatiles present.

16. Laboratories

Name Curtis + Tompkins, LTD

Address 2323 5th St.

City Berkeley State CA Zip 94710

State Certification No. 159

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
Fuel/Waste oil	TPH (High Boiling Point) EPA 3510/3550	EPA 8015
	Total Oil + Grease (TOG) EPA 3550	EPA 503 E
	Volatile Organic Compounds EPA 5020/5030	EPA 8240

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

not recd. yet
per discussion
8/24/88 Eric C.

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

Copy of Certificate enclosed? Yes [X] No []

Name of Insurer Industrial Indemnity

20. Plot Plan submitted? Yes [X] No []

21. Deposit enclosed? Yes [X] 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) BARNETT-RANGE CORPORATION

Signature Walter F. Webber Jr., Project Superintendent

Date 8/29/88

Signature of Site Owner or Operator

Name (please type) BARNETT-RANGE CORPORATION

Signature Walter F. Webber Jr. For Barnett-Range Corporation

Date 8/29/88

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

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.

CERTIFICATE OF INSURANCE

DATE
(MM/DD/YY)

6/16/88

PRODUCER

MC GEE & THIELEN
2525 NATOMAS PARK DR #270
SACTO CA 95833

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**

COMPANY
LETTER **B**

COMPANY
LETTER **C**

COMPANY
LETTER **D** INDUSTRIAL INDEMNITY

COMPANY
LETTER **E**

INSURED BARNETT-RANGE CORPORATION

ELEANOR KAMBEITZ
P O BOX 8189
STOCKTON CA 95208

COVERAGES

THIS IS TO CERTIFY THAT THE 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)	LIABILITY LIMITS IN THOUSANDS	
					EACH OCCURENCE	AGGREGATE
	GENERAL LIABILITY <input type="checkbox"/> COMPREHENSIVE FORM <input type="checkbox"/> PREMISES/OPERATIONS <input type="checkbox"/> UNDERGROUND EXPLOSION & COLLAPSE HAZARD <input type="checkbox"/> PRODUCTS/COMPLETED OPERATIONS <input type="checkbox"/> CONTRACTUAL <input type="checkbox"/> INDEPENDENT CONTRACTORS <input type="checkbox"/> BROAD FORM PROPERTY DAMAGE <input type="checkbox"/> PERSONAL INJURY				<input type="checkbox"/> BODILY INJURY <input type="checkbox"/> PROPERTY DAMAGE <input type="checkbox"/> BI & PD COMBINED <input type="checkbox"/> PERSONAL INJURY	
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS <input type="checkbox"/> GARAGE LIABILITY				<input type="checkbox"/> BODILY INJURY (PER PERSON) <input type="checkbox"/> BODILY INJURY (PER ACCIDENT) <input type="checkbox"/> PROPERTY DAMAGE <input type="checkbox"/> BI & PD COMBINED	
	EXCESS LIABILITY <input type="checkbox"/> UMBRELLA FORM <input type="checkbox"/> OTHER THAN UMBRELLA FORM				<input type="checkbox"/> BI & PD COMBINED	
D	WORKERS' COMPENSATION AND EMPLOYERS' LIABILITY	CB9045415	6/01/88	6/01/89	STATUTORY	<input type="checkbox"/> 500 (EACH ACCIDENT) <input type="checkbox"/> 500 (DISEASE-POLICY LIMIT) <input type="checkbox"/> 500 (DISEASE-EACH EMPLOYEE)
	OTHER					

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

CERTIFICATE HOLDER

CITY OF LIVERMORE - BLDG DEPT.
ATTN: JEANNE CHAFFIN
1052 SOUTH LIVERMORE
LIVERMORE CA 94550

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY'S AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

[Signature]

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



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

Telephone Number: (415) 271-4320

August 23, 1988

Barentt-Range Corporation
P. O. Box 8189
Stockton, CA 95208-1489
Attn: Neal Wilbert, Vice-President

SUBJECT: "MILLS SPRING VALLEY APARTMENT SITE" BETWEEN
SOUTH "L" STREET AND SOUTH "P" STREET, LIVERMORE

Dear Mr. Wilbert:

At the request of the City of Livermore Fire Department, Elizabeth Rose of the Alameda County Department of Environmental Health, Hazardous Materials Division, conducted an inspection of the subject site. The inspection revealed an area of obviously contaminated soil, underground piping with material which appeared to be bunker oil and a vault-like structure filled with unknown material. Also noted were several stockpiles of soil and a metal disposal container with soil and other debris stored inside.

The above conditions represent violations of the California Health and Safety Code (H & SC) and the California Administrative Code (CAC), Title 22 noted below:

- 1) Section 26189.5 (H & SC) forbids the on-site disposal of hazardous waste.
- 2) Section 66508 (CAC) requires hazardous waste containers to be labelled.
- 3) Section 25298 (H & SC) requires closure procedures for underground storage tanks (i.e. vault).

When violations are found and corrections are needed, Section 66328(d), Title 22, CAC requires the owner to submit a written plan of correction, which states the action to be taken and the expected dates of completion. Please submit to this office your plan of correction for the above violations within 30 days of the receipt

Barentt-Range Corporation
P. O. Box 8189
Stocton, CA 95208-1489
Attn: Neal Wilbert
August 23, 1988
Page 2 of 2

of this letter. Your plan of correction must include but shall not be limited to the following:

- 1) Preliminary Assessment
 - site history
 - results of initial work done
 - proposal for the delineation of the site's contamination

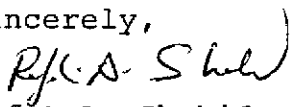
- 2) Site Investigation
 - site geology and hydrogeology
 - definition of lateral and vertical extent of contamination including soil and groundwater
 - evaluation of mitigation alternatives
 - site safety plan

- 3) Final Remediation Plan
 - plans for the removal of soil and/or groundwater contaminants, if necessary
 - details and time frame for implementing the various remedial phases

It is our understanding that you have already contracted with Aqua Resources, Inc. for environmental consulting services and that many of the above items of concern may already be addressed. We also understand that the discovery of contamination revealed during initial grading for the planned apartment complex has curtailed your current construction plans. This office will attempt to review your plan of correction in a timely manner, and will inform you of any changes or additions required for approval.

Please submit a deposit of \$300.00 for Health Agency costs which are assessed at \$53 per hour. Should you have any questions, please contact Lizabeth Rose, Hazardous Materials Specialist at 271-4320.

Sincerely,


Rafat A. Shahid, Chief
Hazardous Materials Division

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Dwight Hoenig, DOHS
Eric Carlson, Fire Marshall, City of Livermore Fire Dept.
Mark Milani, Project Manager, Aqua Resources, Inc.

8/88

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
470 - 27TH ST., RM. 322

OAKLAND, CA 94612
PHONE NO. 415/874-7237

Additional conditions
1. memo, Tony was
2. lead + fuel ^{oil} drums to
be dumped per dc memo
↓ sit
3. Final report of sampling
per 10/26/88 letter to
Submitted within 30 days

ACCEPTED
DEPARTMENT OF ENVIRONMENTAL HEALTH
470 - 27th Street, Third Floor
Oakland, CA 94612
Telephone: (415) 874-7237

These plans have been reviewed and found to be acceptable and essentially meet the requirements of State and health laws. Changes to your plans indicated by this department are to assure compliance with State and local laws. The project approved herein is now released for the area of any required building permits for construction. One copy of these accepted plans must be on the job and available to all contractors and craftsmen involved with the removal.

Any change or alterations of these plans and specifications must be submitted to this Department and to the Fire and Building Inspector. Department to determine if such changes meet the requirements of State and local laws. Notify this Department at least 48 hours prior to the following required inspections:

- Removal of Tank and Piping
 - Sampling
 - Final inspection
- 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.

UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

1. Business Name Barnett Range Corporation
- Business Owner Hal Barnett, Jim Range
2. Site Address 1799 Railroad Ave [temp. const. address] ^{U.S. Post office}
City Livermore Zip 94550 Phone (415) 373-8160 ^{8/31/88}
3. Mailing Address P.O. Box 8189
City Stockton Zip 95208-1487 Phone (209) 951-5140
4. Land Owner Barnett-Range Corporation
Address see above City, State _____ Zip _____
5. EPA I.D. No. CAD 98-248-0717
6. Contractor To be determined
Address _____
City _____ Phone _____
License Type _____ ID# _____
7. Other (Specify) Agua Resources Inc. (Consultants)
Address 2030 Addison St Suite 500
City Berkeley Phone (415) 540-6954

8. Contact Person for Investigation

Name Mark Miani Title Project Mgr
Phone (415) 590-6959

9. Total No. of Tanks at facility _____

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

11. State Registered Hazardous Waste Transporters/Facilities

See listing 10/26/99

a) Product/Waste Transporter

Name To be determined EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

b) Rinsate Transporter

Name _____ EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

c) Tank Transporter

Name _____ EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

d) Contaminated Soil Transporter

Name _____ EPA I.D. No. _____
Address _____
City _____ State _____ Zip _____

12. Sample Collector

Name Agua Resources Inc.
Company " "
Address 2030 Addison St., suite 500
city Berkeley State CA zip 94704 Phone (415) 590-6959

13. Sampling Information for each tank or area

Tank or Area		Material sampled	Location & Depth
Capacity	Historic Contents (past 5 years)		
Approx 22,000 gal.	Tank was abandoned and filled many years ago. Historic content unknown.	Soil backfill	see enclosed site plan Depth: 3'-0"

14. Have tanks or pipes leaked in the past? Yes [] No []
 If yes, describe. No visual leak before excavation of tank

15. NFPA methods used for rendering tank inert? Yes [] No []
 If yes, describe. Tank has no top - no volatiles present.

16. Laboratories
 Name Curtis + Tompkins, LTD
 Address 2323 5th St.
 City Berkeley State CA Zip 94710
 State Certification No. 14772 159

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
Fuel/Waste oil	TPH (High Boiling Point) EPA 3510/3550	EPA 8015
	Total Oil + Grease (TOG) EPA 3550	EPA 503 E
	Volatile Organic Compounds EPA 5020/5030	EPA 8240

18. Site Safety Plan submitted?

Yes []

No

not reqd. yet per discussion 8/24/88 Eric C.

19. Workman's Compensation:

Yes

No []

Copy of Certificate enclosed?

Yes

No []

Name of Insurer

Industrial 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) BARNETT-RANGE CORPORATION

Signature Walter F. Welber Jr., Project Superintendent

Date 8/29/88

Signature of Site Owner or Operator

Name (please type) BARNETT-RANGE CORPORATION

Signature Walter F. Welber Jr. for Barnett-Range Corporation

Date 8/29/88

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.

STATE OF CALIFORNIA

STATE WATER RESOURCES CONTROL BOARD

PAUL R. BONDERSON BUILDING
 901 P STREET
 P.O. BOX 100
 SACRAMENTO, CALIFORNIA 95801
 (916) 324-9496



DEC 29 1986

Local Implementing Agencies

SLG-48: LICENSING FOR INSTALLATION AND REMOVAL OF UNDERGROUND STORAGE TANKS

The State Contractors' License Law requires contractors installing or removing underground storage tanks and piping to have one of the following licenses: General Engineering "A", Limited Speciality C-61/D40 for underground storage tanks and pipelines, Pipeline Contractor C-34 for pipelines only, or General Building "B".

General Engineering "A". This license authorizes a contractor to install or remove any type of underground storage tank. In addition, this contractor may install, excavate, or repair any pipes or appurtenances associated with the underground storage tank.

Limited Specialty C-61/D40. This license authorizes the contractor to install or remove service station-type underground storage tanks only. The contractor may also install, excavate, or repair pipelines and other appurtenances associated with these underground storage tanks.

Pipeline Contractor C-34. This license authorizes the contractor to install, excavate, or repair pipelines or other appurtenances only.

General Building "B". A contractor with this license may install or remove the underground storage tanks that are associated with buildings used to house people, animals, or chattels, provided the work is done while constructing or demolishing any part of these buildings. A contractor with this license may install or remove the underground storage tanks of a service station while the building is being constructed. However, the contractor may not install or remove the underground storage tanks after the building is finished.

If you have any questions concerning licensing, please contact the Contractors' State License Board at (916) 366-5206.

Sincerely,

James W. Baetge
 James W. Baetge, Chief
 Division of Water Quality

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 JAN 5 1987
 ENVIRONMENTAL HEALTH
 ADMINISTRATION