LINCOLN PROPERTY COMPANY

LPC

December 6, 1988

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

RE: Elmhurst Business Park, Oakland, CA

Dear Mr. Howell:

Enclosed please find your copy of the "Observation Report for Removal of Contaminated Stockpiled Sediment".

This is being sent to you per a request from Wayne Biancalana.

Please call us if you should have any questions.

Sincerely,

LINCOLN PROPERTY COMPANY N.C., INC.

Donna Lynn Schenk

Donna Lynn Schenk

/dls

Encls.

Beta Associates, Inc.
Consultants in Waste Management, Environmental Control and the Geotechnical Sciences

December 1, 1988
Project 156-44.2

Lincoln Property Company
101 Lincoln Centre Drive
Foster City, CA 94404

Attention: Mr. Wayne Biancalana

Subject: Observation Report for
Removal of Contaminated Stockpiled Sediment
Elmhurst Business Park
San Leandro Street @ 85th Avenue
Oakland, California

Gentlemen:

This report serves to document the removal and disposal of lead-contaminated sediment stockpiled at Elmhurst Business Park in Oakland, California. The removal and disposal of the sediment was performed in accordance with procedures summarized in Beta Associates' letter dated July 5, 1988 and with the site health and safety plan (SSP) prepared by Excel Trans.

The sediment that was stockpiled on site was removed from a portion of the Alameda County Flood Control Channel underlying the central portion of Elmhurst Business Park. The sediment was stockpiled on a section of the asphalt-surfaced parking area adjacent to Lane-Stanton-Vance Lumber Company.

Summary of Previous Work

Sediment samples from the stockpile were obtained on June 9, 1988 and July 5, 1988 for laboratory chemical analysis (see Beta Associates' reports entitled; "Sediment Stockpile Analysis, Elmhurst Business Park", dated June 27, 1988, and "Flood Control Sediment Stockpile, Waste Profile Analysis" dated July 14, 1988). Results of the analyses revealed the presence of motor oil at a concentration of 1500 parts per million (ppm) and lead exceeding the State Department of Health Services (DHS)-established Soluble Threshold Limit Concentration (STLC) value. The concentration of lead detected in the stockpiled sediment classified the sediment as hazardous waste, mandating transportation and disposal of the sediment to a Class I landfill.

Work Performed

Lincoln Property Company retained Excel Trans, Inc. to remove and dispose of the stockpiled sediment to a Class I landfill. Excel Trans prepared an SSP and submitted it to Alameda County Health Care Services Agency (ACHCSA), Regional Water Quality Control Board (RWQCB), and Department of Health Services (DHS) for approval prior to commencing work on site. The RWQCB and DHS declined to review and approve the SSP, deferring jurisdiction to the ACHCSA (Mr. Donald Hanover, Excel Trans - verbal communication).

Work commenced at the subject site on Tuesday, October 4, 1988, following approval of the SSP by Mr. Ed Howell of the ACHCSA (see enclosed letter dated September 28, 1988 in Appendix A). Mr. Donald Hanover of Excel Trans stated he contacted Mr. Howell with the clean-up schedule so Mr. Howell could schedule an inspector to observe the activities. According to Mr. Hanover, Mr. Howell elected not to send an inpector out for the clean-up.

Mr. Hanover acted as site project supervisor and site safety officer to coordinate activities and oversee the execution of Excel Trans' SSP (see enclosed SSP presented in Appendix B). A representative of Beta Associates was present on-site to observe the activities.

The removal of the sediment stockpile was performed in three phases. Phase I consisted of the establishment of the work zone and preparation of the stockpile for removal. The work zone included the sediment stockpile and truck loading area and was delineated with barricades and barrier tape. The stockpile was prepared by removing the portable chain-link fence surrounding it and removing the plastic tarp covering the stockpile.

Prior to entering the work zone, all personnel donned personal protective equipment consisting of hard hats, goggles, Tyvek coveralls, steel toe safety boots, PVC gloves, and respirators equipped with particulate cartridges and dust covers with filters.

Phase II consisted of the removal of the sediment stockpile. The weather at the subject site on October 4, 6, and 7, 1988, was cool and overcast, with a slight to moderate southerly to southeasterly breeze.

The trucks scheduled to transport the sediment to the Envirosafe Class I disposal facility in Grandview, Idaho remained parked in the staging area adjacent to the work zone while the drivers lined their end-dump trailer beds with visquene. Prior to driving the trucks into the work zone,

the drivers donned personal protective equipment.

One truck was allowed in the work zone at a time. Each truck was loaded from the bucket of a 950 CAT, rubber tire, front-end loader. As each bucket of sediment was loaded into the trailer beds, either the driver or a project laborer misted the material with water to eliminate the generation of dust. The visquene which covered the sediment stockpile was loaded onto a truck to be disposed with the sediment.

While in the work zone, a protective, visquene curtain was draped from the side of each truck to ensure that material dropped during the loading process would not be carried from the work zone on the sides of the truck. However, the protective curtain proved to be an impractical protective device that impaired efficient working conditions, and was therefore eliminated from the work plan. Instead, a visual inspection of each truck was performed before it departed the work zone; ensuring no material was inadvertently carried from the work zone on the sides of the trucks.

Following loading, each truck entered the tarping area. While wearing personal protective equipment, the driver of each truck covered the load. Placards bearing the number 9189, which identified the load as RQ Hazardous Waste Solid N.O.S., ORM-E NA 9189, were displayed on three sides of the trailer beds of each truck. Prior to the departure of each truck from the subject site, Uniform Hazardous Waste Manifests were properly completed. Each truck driver was supplied with the correct copy of the manifest for transportation to the Envirosafe Class I disposal facility in Grandview, Idaho.

On Tuesday, October 4, 1988, after work was completed for the day, the remaining portion of the stockpile was covered with visquene, and the portable chain link fence was placed around the stockpile to prevent unauthorized access. The remainder of the sediment was removed Thursday, October 6, 1988. After all sediment had been removed, it was observed that the overburden pressure of the stockpile had left the asphalt paving pitted.

Phase II was completed over a two-day span (Tuesday, October 4 and Thursday, October 6, 1988). Sixteen trucks were collectively loaded with 643,760 pounds of material.

Phase III consisted of the complete decontamination and sanitization of the work area, which involved cleaning the asphalt surface with a high-pressure water rinse. Phase III was completed over a three day span; October 6, 7, and 8, 1988. Project laborers wore steel toe safety boots, Tyvek coveralls, and PVC gloves while inside the work zone.

Initially, project laborers swept the asphalt free of loose sediment particles within the work zone. The storm drain within the work zone was then sealed to prevent rinseate from draining into the storm sewer system. A secondary layer of visquene was placed over the grate and secured with 25-pound bags of Solid-a-Sorb (an absorbent material).

The asphalt surface within the work zone was then thoroughly cleaned with a high-pressure (1700 psi) water spray. The rinseate which accumulated over the sealed storm drain was continually vacuumed into a trailer-mounted tank and then containerized in 55-gallon drums meeting DOT specifications. Approximately 25-gallons of rinseate was mixed with six to seven 25-pound bags of Solid-a-Sorb per 55-gallon drum. Following the high pressure rinse, the visquene sealing the storm drain was disposed in a 55-gallon drum.

The drums containing the rinseate/Solid-a-Sorb mix were sealed and labeled with markers identifying the contents as hazardous waste, then stored at the north end of the work zone and surrounded with barrier tape. The drums were loaded onto a truck on Thursday, October 13, 1988, and delivered to the Envirosafe disposal facility accompanied by a properly completed Uniform Hazardous Waste Manifest, completing the cleanup operation.

If you have any questions concerning the above activities, please call.

Respectfully submitted,

BETA ASSOCIATES, INC.

Christine L. Hickey
Staff Geologist

Reviewed by:

Daniel L. Shafer
Project Geologist

Jack E. McCollough
Registered Geologist #1559
Certified Engineering
Geologist #905

cc: Mr. John Young, Lincoln Property Company
Mr. Ed Howell, Alameda County Health Care Services Agency
Mr. Lester Feldman, Regional Water Quality Control Board
Mr. Dwight Hoenig, Department of Health Services

APPENDIX A

Letter from Alameda County Health Care Services Agency
dated September 28, 1988

OCT 05 '88 09:08
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

September 28, 1988

Lincoln Property Co.
248 Lincoln Center Dr.
Foster City, CA 94404
Attn: Mr. John Young

SUBJECT: ELMHURST PACK, 80TH AND SAN LEANDRO ST., OAKLAND

Dear Mr. Young:

This letter is to confirm that your plan for removal of sediment at your property is accepted. The supplemental site safety plan prepared by Exceltrans completes the needed documentation for acceptance. You may proceed with the plan as presented.

If you have any questions, please contact Ariu Levi, Hazardous Materials Specialist or Edgar Howell, Program Administrator at 415/271-4320.

Sincerely,

Edgar B. Howell

for Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:mam

✓ cc: A.J. Knickerbocker

APPENDIX B

Site Health and Safety Plan

EXCEL TRANS
397 W.Channel Rd.
CAD981982663

Phone (707) 745-8907
Benicia, CA 94510
ICC209644

SITE SAFETY PLAN

ELMHURST BUSINESS PARK

85th Avenue & San Leandro Street
Oakland, California

LINCOLN PROPERTY COMPANY PROJECT
248 Lincoln Centre Drive
Foster City, CA 94404

Your Innovative Carrier

ELMHURST BUSINESS PARK PROJECT

Site Safety Plan

1. Facility Background:

The Elmhurst Business Park project is a new tilt-up building project located near the intersections of 85th Avenue and San Leandro Street in the City of Oakland, California. In the process of upgrading the flood control channel to current flood control specifications, samples of the accumulated sediment within the channel were obtained for analysis. The results of the sample analysis, previously forwarded to the Alameda County Health Department, by Beta Associates, indicated there were slightly elevated concentrations of motor oil and one sample showing a concentration of lead slightly above the acceptable level of the California Department of Health Services (DOHS) guidelines. Of all the samples taken only one reveals contamination above state acceptable levels. This, however is sufficient to necessitate the transportation of the stockpiled material to a Class I EPA permitted disposal facility.

A copy of the sample analysis was submitted to the Envirosafe Services Facility at Grandview, Idaho. A review of the information submitted was conducted by the Envirosafe Analytical Department and based on their conclusions the material has been determined to be within the limits of acceptability for disposal at their facility

2. Key Personnel and Responsibilities:

The overall responsibility for the safe conduct of activities at the Elmhurst Business Park Project for Excaltrans, Inc. will be that of Mr. A. J. Knickerbocker, Vice President of Operations, the project manager. On site coordination of all activities and responsiblity for safety will be Mr. Donald Hanover, the site project supervisor and on scene safety officer. Mr. Hanover will insure that at all times all personnel are attired in the personal safety gear attributed to be appropriate for the conditions and level of hazard while working at the project site. Mr. Hanover will have total authority to insure that all safety procedures are adhered to and that personnel failing to comply are immediately removed from the project

site. Mr. Hanover has over sixteen years experience in the heavy construction industry and recently attended a course in handling hazardous materials and waste. The project supervisor shall be on site at the project at all times when work is in progress and shall insure that the site is properly secured prior to leaving the site. The project supervisor can be reached during those times when he is not at the project site through the main office at (707) 745-8907.

3. Job Hazard Analysis

Due to the very low level of contamination in the material it is our considered opinion that only a relatively low level of potential hazard to personnel exists at the project site. According to the analysis conducted by California Water Labs, Inc., as reflected in the report from Beta Associates, Inc., dated June 27, 1988, the level of lead found in only one sample of all taken at the project site barely exceeded the State of California concentration level of contamination requiring Class 1 disposal as hazardous waste. While Exceltrans intends to take every precaution to insure the safety of its personnel on site we do not believe that a high level of sophisticated protective equipment is called for. The weather conditions should be such that heat, cold, rain or high wind should not be a factor.

We believe that the main consideration will be to control the small amount of dust that will be generated in the process of picking up the material from its location on the asphalt driveway/parking apron and loading it into the dump trucks staged on sight. With this in mind it is our intent to provide light water fogging to insure that any dust generated during the loading process will be minute in nature. Based upon our on site assessment of the material it does not appear that dust will be a major factor.

4. Risk Assessment:

As stated in the foregoing section, the risks to personnel on site, or in the immediate area surrounding the project site, will be practically non existent due to the quantity and nature of the material.

5. Exposure Monitoring Plan:

In consideration of the very small quantity of material, the level of contamination and the only potential problem being an extremely low potential for generating dust which will be controlled by low level water fogging there appears to be a need for only a visual monitoring by the on site project supervisor to insure that any potential for dust is kept under control.

6. Personal Protective Equipment

As previously stated, the level of concentration of hazardous material is so low that a high degree of sophisticated personal protective equipment is not called for. The below listed personal protective equipment will be required for all personnel within the job site: (1) Hard Hat, (2) Goggles, (3) Tyvek coveralls, (4) Steel Toe Safety Shoes/Boots, (5) PVC Work Gloves, (6) Respirator with high efficiency particulate cartridges and dust covers with filters.
(Note: Item 6, respirator will be required by loader operator, truck drivers and anyone inside of the handling area while loading operations are being conducted. Once outside the handling area the respirator may be removed.

7. Work Zones and Security Measures:

There exists at the project site a chain link fence that isolates the material from the general public. Prior to commencing the program of removing the contaminated material, a limited access area will be established by use of barricades and barrier tape. The area of current contamination as identified with the chain link fence is pre- established. A loading area will be established and anyone entering either the limited access or loading areas will be required to have the proper personnel protective equipment on when entering and at all times while in these zones. Truck Drivers will be required to secure their loads including the complete tarping of their loads prior to departing the loading zone. Prior to leaving this zone, any contaminated personal safety equipment will either be decontaminated or disposed of in waste drums provided for that purpose.

8. Decontamination Measures

As previously discussed, the control of dust is the primary consideration in this project. In the process of handling the material while loading trucks and movement of personnel within the loading zone, it is expected that there will be a very small amount of material dropped on the ground. The design of the loading area and the use of certain control measures will insure that any material dropped on the ground while loading cannot be tracked out of the loading area either by personnel or on equipment. The dump trucks will have protective curtains draped from their sides to insure that any material dropped during the loading process will land on the ground inside the loading area and will not be carried from the loading area on any of the loaded trucks. Any personnel departing the loading area will remove that contaminated equipment, that cannot be sanitized, prior to departing from the contaminated area so as not to carry any contaminated material from the area.

9. General Safe Work Practices:

To insure that work is conducted in as safe a manner as is possible, all non essential personnel shall be restricted from the work area, while loading operations are taking place. Truck drivers shall remain in the cabs of their trucks so that they can move their trucks as required for the operator of the loading equipment. In addition to the loader operator, the only other personnel required to be in the work area would be the Project Supervisor and, if necessary, one laborer to assist the project supervisor and the loader operator in handling the water hose for dust control. Personnel involved in the loading operations are to be instructed that no operations are to be conducted if any other personnel are within the loading area boundaries.

10. Standard Operating Procedures:

It is the intent of Excaltrans to implement an on site plan to insure that all personnel are not exposed unnecessarily to any level of hazardous materials. As previously discussed, only those personnel absolutely necessary to the work activities will be allowed in the loading area. A portable restroom will be provided for project personnel. Truck drivers will not be allowed to depart the work area until their loading operations are completed. By minimizing the access to the job site, decontamination activity will be kept at a minimum. Personnel scheduled to work within the loading area will be properly attired with the appropriate safety

equipment. Those personnel required to wear respirators will be properly indoctrinated and have the proper fit test of their respirator prior to commencement of the project. Decontamination will be limited to that equipment working in the loading area and those personnel who require access. As a routine part of the operation necessary containment and ground cover will be in place to further insure that the possibility of any spread of contamination is eliminated.

11. Contingency Plan(s)

Due to the nature of the project and the extremely low level of hazard and likewise low level of personal risk the need for a sophisticated contingency plan is not necessary. The potential of having a spill on site is nearly non existent as the only function to be performed on site is the loading of low level contaminated dirt into dump trucks. The control of dust is the primary concern and this potential problem is covered in previous sections. The possibility always exists whenever heavy equipment is used in the handling of hazardous waste that accidents can occur on the job site. With this in mind Exceltrans has determined that the nearest facility offering emergency room capability to handle any contingency relating to personnel injury would be Oakland Hospital located on East 14th street which offers on call emergency room service at telephone number (415) 532-6300.

The aforementioned decontamination of personnel departing from the loading area would likewise be the basic procedure for handling persons injured within the loading area. A segregated area will be provided for personnel required to work within the loading area to remove contaminated clothing and place them into receptacles designated for contaminated clothing and equipment disposal. Attached and forming a part of this site safety plan is the Exceltrans Transportation Contingency Plan that must be followed by all drivers involved in the transportation of hazardous wastes while in the employment of Exceltrans.

12. Training Requirements.

All Exceltrans personnel have received a minimum of thirty two (32) hours of training relating to the handling of hazardous wastes and hazardous materials and the transportation of hazardous materials and hazardous wastes in both intrastate and interstate service. All personnel

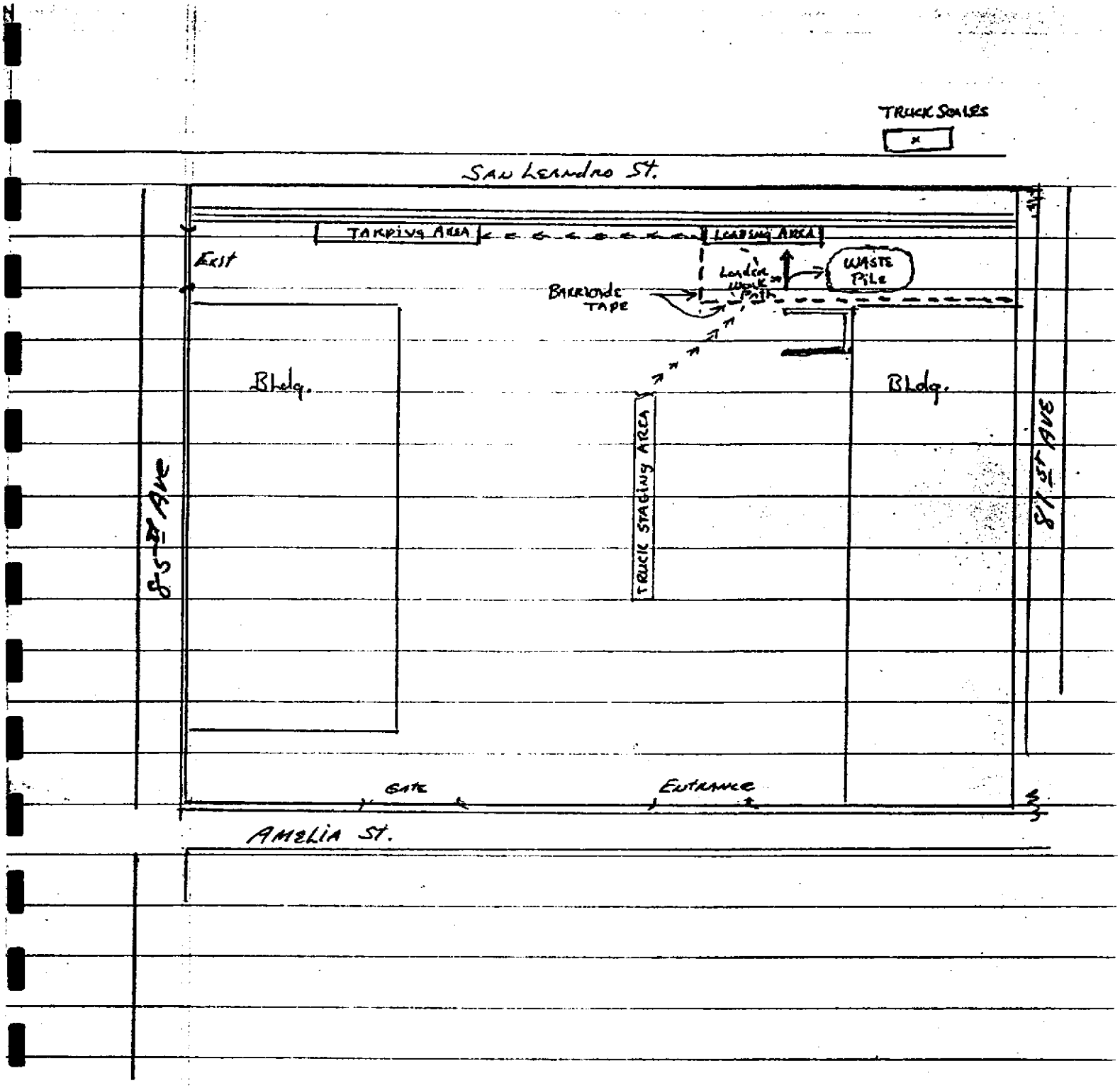
involved with the loading and transporting of the contaminated sediment from the Elmhurst Project will be included in the daily tailgate safety meetings that will be conducted prior to commencment of work each day. It is anticipated that the entire project will not exceed four working days to complete. The essential elements of the site tailgate meetings will be to remind all personnel of the requirements for wearing proper safety equipment, remaining clear of heavy equipment while loading trucks, insuring that no contaminated materials are carried outside of the loading area and that proper respiratory gear is worn to insure that the possibility of inhaling contaminated dust is eliminated.

13. Medical Surveillance Program:

As part of the prehire process, Exceltrans requires all prospective employees to take a prehire physical examination to insure there are no pre-existing medical problems that could cause the employee to incur further problems as a result of his exposure to any hazardous materials or waste. During current and subsequent projects in which Exceltrans may become involved to any degree, on site Project Supervisors are directed to insure that anyone they suspect may have become exposed to contamination to any extent, are immediately ordered to proceed to the designated medical facility for tests to determine if exposure to any hazardous materials or wastes has occurred that might be injurious to the individual concerned. Subsequent to completion of any project, but no less than every two years, all employees are directed to undergo a complete examination to insure that no medical problems have occured since the last medical evaluation.

14. Recordkeeping:

Required records regarding the health and welfare of all employees are maintained as part of the permanent records in the company office of Exceltrans, Inc., in Benicia, CA. These records contain all information pertaining to medical surveillance, training, injuries/illnesses,


TRUCK SCALES
SAN LEANDRO ST.
TARPING AREA
LOADING AREA
EXIT
LOADER
WASTE PILE
BARRICADE TAPE
Bldg.
Bldg.
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85TH AVE
GATE
ENTRANCE
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