

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
05-17-06

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

May 12, 2006

Keith Wood
1554 La Prada Court
Livermore, CA 94550-5922

Bruce and Debra Roen
CW Roen Company
P.O. Box 4
Danville, CA 94526

Subject: SLIC Case RO0002912, K&S Heavy Equipment, 495 North Greenville Road, Livermore, CA

Dear Mr. Wood and Mr. and Ms. Roen:

In order for ACEH to review reports for your site, we would require an oversight account for the above-referenced site. To set up your account, please send a check in the amount of \$6,000.00 payable to Alameda County Environmental Health. Please send your check to the attention of our Finance Department.

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

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

Please write "SLIC" (the type of project), the site address, and the AR# 316173 on your check.

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

Sincerely,

Ariu Levi
Division Chief

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

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R02912

Certified Mailer # P 062 127 757

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

January 18, 1991

Mr. Bruce Roen
C. W. Roen Construction Co.
P. O. Box 4
Danville, CA 94526

NOTICE OF VIOLATION

Dear Mr. Roen:

On January 10, 1991 the Alameda County Department of Environmental Health, Hazardous Materials Division inspected the C. W. Roen construction storage/service yard at 495 N. Greenville Rd. in Livermore. During this inspection, the Division found several areas of stained soil in front of the maintenance shop, where hydrocarbon releases or spillage had occurred. Contamination was particularly evident in the steam-cleaning area, where wastes from the steam cleaning of vehicles and equipment have drained directly to the soil.

Such spillage and runoff of contaminants constitute on-site disposal of hazardous waste, which violates Section 25189.5 of the California Health and Safety Code (H&SC). Therefore, the steam-cleaning operation must cease immediately. Then, all areas of soil contamination in and around the steam-cleaning area, as well as in the rest of the yard, must be excavated, followed by sampling and analysis of soil beneath each area of contamination. The purpose of these analyses for petroleum hydrocarbons is to confirm that all affected soil has been removed. A work plan for these tasks needs to be developed and submitted to this office for approval; it should be signed by a California-registered engineer or geologist.

Should C. W. Roen wish to resume steam-cleaning operations at this facility, an appropriate oil/water separator must be installed and serviced so that liquid and solid contaminants are removed and recycled/disposed of as hazardous waste. Assuming it is fully separated from sludges and hydrocarbons, treated wastewater from the steam-cleaning process can only be discharged into surface waters under a federal NPDES permit, from the San Francisco Bay Regional Water Quality Control Board (RWQCB). Disposal to land requires a state Waste Discharge Requirements permit, also from the RWQCB. In either case, discharges cannot occur unless the water is treated in some manner to "non-detect" levels. Another option for a steam-cleaning setup would be the use of a closed-loop system that would not require any discharge of wastewater.

Mr. Bruce Roen
January 18, 1991
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During the inspection, the Hazardous Materials Division also noted the following violations of the California Code of Regulations, Title 22, at the Wentz Brothers facility. (For your information, copies of Title 22, Division 4 may be obtained through the following vendor:

Barclay's Law Publisher
P. O. Box 3066
South San Francisco, CA 94083
(415) 244-6611)

1. Sec. 66508 - Hazardous wastes in the numerous 55-gallon drums and 5-gallon containers stored outdoors have been accumulating for over 90 days. None of these containers was labeled properly, and their contents are not identified. All vessels containing hazardous waste must be clearly labeled and their contents disposed of at least every 90 days. These wastes must therefore be identified and properly disposed of immediately.
2. Sec. 67241 - Some 55-gallon drums are rusted or otherwise in deteriorated condition. Product (as opposed to waste) in such drums should be used up immediately or transferred to containers in better condition. Hazardous waste in such drums must be disposed of promptly, and the drums retired thereafter.
3. Sec. 67242 - The facility has apparently mixed used antifreeze into the waste oil tank on occasion. These wastes need to be stored, labeled, and handled separately.
4. Sec. 67243 - Several hazardous waste containers were found to be open during the inspection; they must always be kept closed to minimize spillage and prevent overflow.
5. Sec. 67244 - C. W. Roen Construction Co. has failed to carry out frequent inspections and maintenance of hazardous waste storage areas, which appear neglected and in poor condition. The accumulation of unmarked, unidentified drums is a consequence of such neglect.
6. Sec. 67245 - Because hazardous wastes at the facility are stored outdoors, secondary containment is required. The volume of such systems should be 10% of the combined volume of all drums or containers in storage plus at least 3 inches of freeboard to contain precipitation. This is a reference to the drum storage area; the waste oil tank may already have acceptable secondary containment. This secondary containment requirement also applies to the above-ground diesel tank.

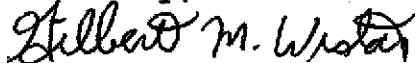
Mr. Bruce Roen
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7. Finally, according to the California Health and Safety Code, Division 20, Chapter 6.95, your firm has failed to submit to this office a comprehensive Hazardous Materials Management Plan. The requirements of the HMMP have been explained to you during the inspection, and generally must include a thorough hazardous material/waste inventory, employee training information, and contingency procedures to be implemented in the event of a chemical spill or release.

In accordance with Sec. 66328 of Title 22, please submit a Plan of Correction to this office within 30 days, or by **February 18, 1991**. The plan should specify the actions to be taken to address each of the above violations and the dates by which these corrections will be implemented. It should also include the work plan described above, as well as a description of procedures to be put into place to prevent future violations.

If you have any questions concerning this letter, please contact me at 271-4320.

Sincerely,



Gil Wistar
Hazardous Materials Specialist

c: Howard Hatayama, DOHS
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division

Rafat Shahid, Assistant Agency Director, Environmental Health
files

