

## Wickham, Jerry, Env. Health

---

**From:** Jonas, Mark [mjonas@croworld.com]  
**Sent:** Friday, March 20, 2009 12:19 PM  
**To:** Wickham, Jerry, Env. Health  
**Cc:** mark@borsuk.com; Werner, Michael  
**Subject:** Corrected ACEH Correspondence 1424 Harrison - Borsuk 540188  
**Attachments:** Corrected ACEH Correspondence 1424 Harrison.pdf

Dear Jerry:

Mark Borsuk and I would like to thank you for requiring environmental work at the 1424 Harrison property. But, while reading through your correspondence we identified a date that needed correction. Specifically, when the USTs were closed in-place. According to the City of Oakland permit, the two USTs were filled in April 1982. The 1991 ACEH Hazardous Materials Inspection Form was completed after the fact. Attached is the corrected correspondence along with the permit, inspection form, and supporting documentation.

Thank you again for following up on the 1424 Harrison property.

Sincerely,

**Mark Jonas**

Mark Jonas, P.G.

**Conestoga-Rovers & Associates, Inc.**

5900 Hollis Street, Suite A

Emeryville, California 94608

510/420-3307 direct

510/420-9170 fax

[www.CRAworld.com](http://www.CRAworld.com)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-93

January 8, 2009

Mr. William Spencer  
William and Claire Spencer Trust  
99 South Hill Drive  
Brisbane, CA 94005-1215

Joel and George Sparks  
74819 Depot  
Irrigon, OR 97844

Subject: Fuel Leak Case No. RO0002992 and Geotracker Global ID T0600100961, Sparks Property,  
1424 Harrison Street, Oakland, CA 94612

Dear William Spencer and Joel and George Sparks:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including recently submitted correspondence from Mr. William Spencer dated January 6, 2009. Two underground storage tanks (USTs) were closed in place beneath the sidewalk at 1424 Harrison Street in Oakland ~~on April 29, 1991~~ <sup>1982</sup> by filling the tanks with a cement slurry. Subsequent to the closure in place of the two USTs at 1424 Harrison Street in 1991, soil and groundwater sampling was conducted as part of a site investigation for leaking fuel USTs at 1432 Harrison Street. In addition to numerous borings advanced at 1432 Harrison Street, several soil borings were advanced in the immediate area of the closed in place USTs at 1424 Harrison Street. Total petroleum hydrocarbons (TPH) as gasoline were detected in shallow soil beneath the closed in place USTs at concentrations up to 1,900 milligrams per kilogram (mg/kg). Benzene was detected in shallow soil beneath the closed in place USTs at concentrations up to 35 mg/kg. The distribution of fuel hydrocarbons in shallow soil in the area of the two USTs closed in place beneath the sidewalk at 1424 Harrison Street appears to be the result of an unauthorized release from the USTs, piping, or dispensers at 1424 Harrison Street.

The January 6, 2009 correspondence from Mr. Spencer contends that any and all contamination detected at 1424 Harrison Street originated from another site. Based on our review of data from 1424 Harrison Street and the surrounding properties, fuel hydrocarbons detected in shallow soil in the area of the two USTs closed in place beneath the sidewalk at 1424 Harrison Street appear to be the result of an unauthorized release from the USTs, piping, or dispensers at 1424 Harrison Street. The January 6, 2009 correspondence from Mr. Spencer references several pages of a report by Vertex Engineering Services dated March 4, 2002. The Vertex report reviews information regarding the two USTs closed in place beneath the sidewalk at 1424 Harrison Street and concludes that, "The two abandoned USTs at the site represent a concern to this investigation." The Vertex report recommends the collection of soil and/or groundwater samples at the site to assess if the site has been impacted from the on-site USTs. We concur with this recommendation in the Vertex report and request that you submit a Work Plan to conduct soil and groundwater sampling to characterize the extent of contamination from the two closed-in-place USTs. As discussed in the first paragraph of this letter, soil and groundwater sampling was conducted as part of a site investigation for leaking fuel USTs at 1432 Harrison Street, which is the property immediately north of 1424 Harrison Street. Please review the results from the site investigations conducted to date for 1432 Harrison Street to plan your investigation. Case files are available for review online at the Alameda County Environmental Health website (<http://www.acgov.org/aceh>). The leaking fuel case at 1432 Harrison Street is ACEH case RO0000266 and can be accessed online using either the

William Spencer  
Joel and George Sparks  
RO0002992  
January 8, 2009  
Page 2

case number or street address. Please submit the Work Plan to characterize the extent of contamination from the two closed-in-place USTs at 1432 Harrison Street by **March 27, 2009**.

### **REQUEST FOR INFORMATION**

The January 6, 2009 correspondence from Mr. Spencer references, "several reports," that apparently investigated environmental conditions at the site. We require that you submit all reports for the site that Please submit copies of any reports you have documenting additional investigation activities or other work that are relevant to the fuel release or other unauthorized releases and not currently in ACEH case files. This includes Phase I environmental site assessment reports and site investigations conducted for potential real estate transactions. ACEH case files may be reviewed online using the ACEH website (<http://www.acgov.org/aceh>).

### **TECHNICAL REPORT REQUEST**

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **March 27, 2009** – Work Plan

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

### **ELECTRONIC SUBMITTAL OF REPORTS**

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (<http://www.swrcb.ca.gov/ust/cleanup/electronic-reporting>).

William Spencer  
Joel and George Sparks  
RO0002992  
January 8, 2009  
Page 3

#### PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

#### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

#### UNDERGROUND STORAGE TANK CLEANUP FUND

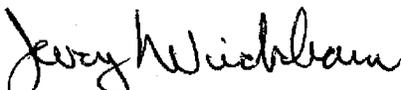
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

#### AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at 510-567-6791 or send me an electronic mail message at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org).

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297  
Senior Hazardous Materials Specialist

William Spencer  
Joel and George Sparks  
RO0002992  
January 8, 2009  
Page 4

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

Certified Mail #: 7002 2030 0006 9574 2621

December 18, 2008

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

**NOTICE OF RESPONSIBILITY**

**Site Name & Address:**

**SPARKS PROPERTY  
1424 HARRISON ST  
OAKLAND, CA 94612**

**Local ID: RO0002992  
Related ID: NA  
RWQCB ID:  
Global ID: T0600100961**

**Responsible Party:**

**WILLIAM AND CLAIRE SPENCER  
WILLIAM AND CLAIRE SPENCER TRUST  
99 S HILL DRIVE  
BRISBANE CA 94005-1215**

**Date First Reported: 7/23/2007**

**Substance: 8006619 Gasoline-Automotive (motor gasoline  
and additives), leaded & unleaded**

**Funding for Oversight: LOPS - LOP State Fund**

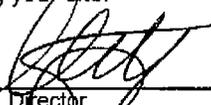
**Multiple RPs?: Yes**

Pursuant to sections 25297.1 and 25297.15 of the Health and Safety Code, you are hereby notified that the above site has been placed in the Local Oversight Program and the individual(s) or entity(ies) shown above, or on the attached list, has (have) been identified as the party(ies) responsible for investigation and cleanup of the above site. Section 25297.15 further requires the primary or active Responsible Party to notify all current record owners of fee title before the local agency considers cleanup or site closure proposals or issues a closure letter. For purposes of implementing section 25297.15, this agency has identified JOEL AND GEORGE SPARKS as the primary or active Responsible Party. It is the responsibility of the primary or active Responsible Party to submit a letter to this agency, within 20 calendar days of receipt of this notice that identifies all current record owners of fee title. It is also the responsibility of the primary or active Responsible Party to certify to the local agency that the required notifications have been made at the time a cleanup or site closure proposal is made or before the local agency makes a determination that no further action is required. If property ownership changes in the future, you must notify this local agency within 20 calendar days from when you are informed of the change.

Any action or inaction by this local agency associated with corrective action, including responsible party identification, is subject to petition to the State Water Resources Control Board. Petitions must be filed within 30 days from the date of the action/inaction. To obtain petition procedures, please FAX your request to the State Water Board at (916) 341-5808 or telephone (916) 341-5650.

Pursuant to section 25296.10(c)(6) of the Health and Safety Code, a responsible party may request the designation of an administering agency when required to conduct corrective action. Please contact this office for further information about the designation process.

Please contact your caseworker WICKHAM, JERRY, at this office at (510)567-6791 if you have questions regarding your site.

  
\_\_\_\_\_  
ARIU LEVI, Director  
Contract Project Director

Date: 12/21/08

Action: Add  
Reason: ADD RP

Attachment A: Responsible Parties Data Sheet  
cc: Jennifer Jordan, SWRCB, D. Drogos, File

ALAMEDA COUNTY ENVIRONMENTAL HEALTH  
LUFT LOCAL OVERSIGHT PROGRAM

ATTACHMENT A - RESPONSIBLE PARTIES DATA SHEET

January 02, 2009

**Site Name & Address:**

**SPARKS PROPERTY  
1424 HARRISON ST  
OAKLAND, CA 94612**

**Local ID: RO0002992**

**Related ID: NA**

**RWQCB ID:**

**Global ID: T0600100961**

**All Responsible Parties**

---

**RP has been named a Primary RP - JOEL AND GEORGE SPARKS  
JOEL R AND GEORGE WILLIAM JR SPARKS  
74819 DEPOT | IRRIGON, OR 97844 | Phone No Phone Number Listed**

---

**RP has been named a RP - WILLIAM AND CLAIRE SPENCER  
WILLIAM AND CLAIRE SPENCER TRUST  
99 S HILL DRIVE | BRISBANE, CA 94005-1215 | Phone No Phone Number Listed**

---

**Responsible Party Identification Background**

Alameda County Environmental Health (ACEH) names a "Responsible Party," as defined under 23 C.C.R. Sec. 2720. Section 2720 defines a responsible party 4 ways. An RP can be:

1. "Any person who owns or operates an underground storage tank used for the storage of any hazardous substance."
2. "In the case of any underground storage tank no longer in use, any person who owned or operated the underground storage tank immediately before the discontinuation of its use."
3. "Any owner of property where an unauthorized release of a hazardous substance from an underground storage tank has occurred."
4. "Any person who had or has control over an underground storage tank at the time of or following an unauthorized release of a hazardous substance."

ACEH has named the responsible parties for this site as detailed below.

# ATTACHMENT A - RESPONSIBLE PARTIES DATA SHEET (Continued)

January 02, 2009

## Responsible Party Identification

### Existence of Unauthorized Release

Two underground storage tanks (USTs) were closed in place beneath the sidewalk at 1424 Harrison Street in Oakland ~~on April 20, 1994~~ <sup>1982</sup> by filling the tanks with a cement slurry. Subsequent to the closure in place of the two USTs at 1424 Harrison Street in 1991, soil and groundwater sampling was conducted as part of a site investigation for leaking fuel USTs at 1432 Harrison Street. In addition to numerous borings advanced at 1432 Harrison Street, several soil borings were advanced in the immediate area of the closed in place USTs at 1424 Harrison Street. Total petroleum hydrocarbons (TPH) as gasoline were detected in shallow soil beneath the closed in place USTs at concentrations up to 1,900 milligrams per kilogram (mg/kg). Benzene was detected in shallow soil beneath the closed in place USTs at concentrations up to 35 mg/kg. The distribution of fuel hydrocarbons in shallow soil in the area of the two USTs closed in place beneath the sidewalk at 1424 Harrison Street appears to be the result of an unauthorized release from the USTs, piping, or dispensers at 1424 Harrison Street.

### Responsible Party Identification

Joel R. and George W. Sparks owned the USTs ~~until they were removed in 1994~~ <sup>when they were closed in place in April 1982</sup>. Joel R. and George W. Sparks were the property owners for 1424 Harrison Street from 1981 up until 2002. Joel R. and George W. Sparks are responsible parties because they owned and operated the USTs immediately before the discontinuation of their use (Definition 2), were the property owners where an unauthorized release from a UST occurred (Definition 3), and had control of USTs at the time of or following an unauthorized release (Definition 4).

The William D. and Claire A. Spencer Trust purchased the property on March 22, 2002. The William D. and Claire A. Spencer Trust is a responsible party because they are the current owner of a property where an unauthorized release from a UST has occurred (Definition 3).

<b>U.S. Postal Service™</b>	
<b>CERTIFIED MAIL™ RECEIPT</b>	
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
<b>OFFICIAL USE</b>	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement F)	
Total Postage	
Postmark Here	
<b>WILLIAM AND CLAIRE SPENCER</b>	
<b>WILLIAM AND CLAIRE SPENCER</b>	
<b>TRUST</b>	
<b>99 SOUTH HILL DRIVE</b>	
<b>BRISBANE, CA 94005-1215</b>	
Sent To	
Street, Apt. No. or PO Box No.	
City, State, ZIP+4	
PS Form 3800, June 2002	
See Reverse for Instructions	

Excavation Permit Granted \_\_\_\_\_ No. \_\_\_\_\_

# CITY OF OAKLAND

Tank Permit 8561

Permit to Excavate and Install, Repair, or Remove Inflammable Liquid Tanks. No. \_\_\_\_\_  
Oakland, California, April 21, 1982 19\_\_

PERMISSION IS HEREBY GRANTED TO ~~XXXXXX~~ ~~XXXXXX~~ ~~XXXXXX~~ <sup>fill</sup> Gasoline tank and excavate commencing \_\_\_\_\_ feet inside property line

on the \_\_\_\_\_ side of \_\_\_\_\_ Street Avenue \_\_\_\_\_ feet \_\_\_\_\_ of \_\_\_\_\_ Street Avenue

House No. 1424 Harrison Street Street Avenue \_\_\_\_\_ Present Storage 1 - 1000 1 - 550 gallon tank

Owner Bill & Chip Sparks Address 2424 Webster Street Phone 893-5855

Applicant same Address \_\_\_\_\_ Phone \_\_\_\_\_

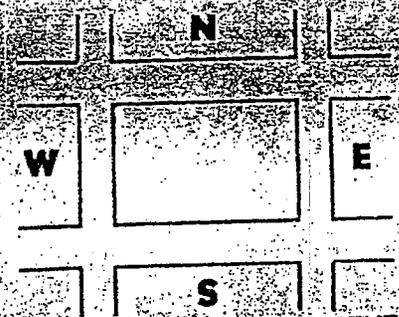
Dimensions of street (sidewalk) surface to be disturbed \_\_\_\_\_ X \_\_\_\_\_ Number of Tanks \_\_\_\_\_ Capacity \_\_\_\_\_ Gallons, each.

Remarks: \_\_\_\_\_

This Permit is granted in accordance with existing City Ordinances.  
Owner hereby agrees to remove tanks on discontinuance of use or when notified by the City Authorities.  
When installing, removing or repairing tanks, no open flame to be on or near premises.

Approved \_\_\_\_\_ Fire Marshal

Approved \_\_\_\_\_ Drainage Division Engineering Dept.



## EXCAVATING PERMIT

Issued in accordance with Ord. No. 278 CMS, Sec. 6-2.04

\_\_\_\_\_ square feet of digging or removal granted.

The receipt of \$ \_\_\_\_\_ special deposit is hereby acknowledged.

GENERAL DEPOSIT.

BUREAU OF PERMITS AND LICENSES.

## CERTIFICATE OF TANK AND EQUIPMENT INSPECTION

Inspected and passed on 4-30-82 19\_\_

By [Signature] Fire Marshal

Inspection Fee Paid \_\_\_\_\_ 20.00 ck#0308 rec#107298

Received by [Signature]  
FIRE PREVENTION BUREAU

## NOTICE

Before Covering Tanks, Above Certificate Must Be Signed.  
When ready for inspection notify Fire Prevention Bureau, 273-3851

**THIS PERMIT MUST BE LEFT ON THE WORK AS AUTHORITY THEREFOR.**

4021  
273-3851

white -env.health  
yellow -facility  
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Inspection Form

80 Swan Way, #200  
Oakland, CA 94621  
(415) 271-4320

II, III

Site ID # \_\_\_\_\_ Site Name Bill Sparks Today's Date 1/29/91

II.A BUSINESS PLANS (Title 19)

- \_\_\_ 1. Immediate Reporting 2703
- \_\_\_ 2. Bus. Plan Stds. 25503(b)
- \_\_\_ 3. RR Cars > 30 days 25503.7
- \_\_\_ 4. Inventory Information 25504(a)
- \_\_\_ 5. Inventory Complete 2730
- \_\_\_ 6. Emergency Response 25504(b)
- \_\_\_ 7. Training 25504(c)
- \_\_\_ 8. Deficiency 25505(a)
- \_\_\_ 9. Modification 25505(b)

Site Address 1424 Harrison St

City Oakland Zip 94612 Phone 593-5855

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

Inspection Categories:

- \_\_\_ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
- \_\_\_ II. Business Plans, Acute Hazardous Materials
- III. Underground Tanks

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

Comments: Info w/ regard to underground tanks or unknown  
12 yrs ago IUST was filed as per volume  
Oakland Fire protocol

III. UNDERGROUND TANKS (Title 23)

- |                               |   |
|-------------------------------|---|
| General                       | ___ 1. Permit Application 25284 (H&S)   |
|                               | ___ 2. Pipeline Leak Detection 25292 (H&S)  |
|                               | ___ 3. Records Maintenance 2712   |
|                               | ___ 4. Release Report 2651  |
|                               | ___ 5. Closure Plans 2670   |
| Monitoring for Existing Tanks | ___ 6. Method   |
|                               | 1) Monthly Test   |
|                               | 2) Daily Vadose<br>- Semi-annual groundwater<br>One time soils                          |
|                               | 3) Daily Vadose<br>One time soils<br>Annual tank test                                   |
|                               | 4) Monthly Gndwater<br>One time soils   |
|                               | 5) Daily Inventory<br>Annual tank testing<br>Cont pipe leak det<br>Vadose/gndwater mon. |
|                               | 6) Daily Inventory<br>Annual tank testing<br>Cont pipe leak det                         |
|                               | 7) Weekly Tank Gauge<br>Annual tank testing   |
|                               | 8) Annual Tank Testing<br>Daily Inventory   |
|                               | 9) Other _____  |
|                               | ___ 7. Precip Tank Test 2643  |
|                               | Date: _____   |
| ___ 8. Inventory Rec. 2644    |   |
| ___ 9. Soil Testing. 2646     |   |
| ___ 10. Ground Water. 2647    |   |
| New Tanks                     | ___ 11. Monitor Plan 2632   |
|                               | ___ 12. Access, Secure 2634   |
|                               | ___ 13. Plans Submit 2711   |
|                               | Date: _____   |
| ___ 14. As Built 2635         |   |
| Date: _____                   |   |

Mr Sparks doesn't have any paperwork on  
the premises but he will look for any  
in the building purchase paperwork

Mr Sparks is the current owner of the  
above facility. During building remodeling  
permits were taken for reconstruction of bar  
in place closure

Mr Sparks states that a fire dept repres-  
entative was present during slurry fill  
in tank.

The tank was emptied prior to filling  
w/ cement slurry

I will check back next Monday 5/6/91  
to inquire as to the paperwork

Rev 6/88

if of Oakland permit to  
11, 1986

Contact: Mr Bill Sparks

Title: owner

Signature: Bill Sparks

Inspector: Paul Smith

Signature: Paul M Smith

II, III

Paul Smith  
if of Oakland permit per volume 2/7/91

Excerpt from 1998 UST Fund appeal submitted by Mark Borsuk.

b. 1424 Harrison Street.

The property at 1424 Harrison Street is next door to the Claimant's site. See **Selective Site Enforcement Map**. In 1982, the two petroleum USTs were abandoned. Prior law allowed filling the tanks and closing them in place even though they represented a potential source of contamination. The property is up gradient from the Claimant's site.

In April, 1991, Mr. Paul Smith investigated the situation. Despite his great concern over leaking tanks at the Claimant's site, he evidenced no interest in the tanks three meters away as a possible source of contamination. In 1996, the FUND allowed the Claimant to test for upgradient contamination. Soil borings confirmed contamination as high as 1,900 ppm (TPH-g) and 0.95 ppm benzene.

Apparently, safeguarding the environment was only an afterthought for Mr. Smith and DDA Thomson. Why else would they ignore the potential source next door unless they were more interested in punishing the Claimant than in protecting the environment.

---

Paul Smith's handwritten notes from Hazardous Materials Inspection Form dated April 29, 1991. Transcription by Mark Borsuk. Please compare with original.

"Site Name: Bill Sparks  
Date: April 29, 1991  
Site Address: 1424 Harrison St.  
City: Oakland  
ZIP: 94612  
Phone: 893-5855

Comments:

Insp w/ regard to underground tanks of unknown volume.

12 years ago 1 UST was filed as per Oakland Fire protocol.

Mr. Sparks doesn't have any paperwork on the premises but he will look for any in the building purchase paper work.

Mr. Sparks is the current owner of the above facility. During building remodeling permits were taken for reconstruction & for in place closure.

Mr. Sparks states that a fire dept. representative was present during slurry fill in tank.

The tank not emptied prior to filling w/cement slurry.

I will check back next Monday 5/6/91 to inquire as to the paperwork."

---