

June 12, 1995

Mr. David Kuhre
The Oliver Rubber Company
1200 65th Street
Emeryville, CA 94608

SUBJECT SITE:

The Oliver Rubber Company

1200 65th Street Emeryville, California

Dear Mr. Kuhre:

This letter documents the destruction of monitoring wells MW-1 through MW-3 at the above referenced site. The work was completed under Alameda County Flood Control and Water Conservation District (Zone 7) drilling permit #95328 issued to Aqua Science Engineers (ASE) on May 25, 1995. A copy of the drilling permit is attached.

On May 31, 1995, Soils Exploration Services (licence #C-57 582696) of Benicia, California destroyed monitoring wells MW-2 and MW-3 at the subject site under the direction of ASE by removing the wellbox protecting the well and drilling around and removing the well casing. All cement sanitary seals, bentonite layers and sand pack materials were removed to the total depth of the wells. The remaining boreholes were filled with neat cement placed by tremie pipe. Monitoring well MW-1 was destroyed using the same methodology on June 6, 1995. An electric line directly above monitoring well MW-1 required a drill rig with a detachable mast in order to safely destroy the well, thus it was destroyed with a different rig on June 6, 1995. Soil cuttings produced during the drilling were spread in a dirt area on the site, and the well casing and other well materials were removed from the site.

Following the well destruction, ASE filed a California Department of Water Resources (DWR) well completion report with the DWR and Zone 7 as required.

Please feel free to contact us if you have any questions or comments at (510) 820-9391.

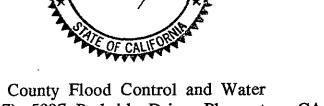
Respectfully submitted,

AQUA SCIENCE ENGINEERS, INC.

Robert E. Kitay, R.E.A.

Project Geologist

Rely E. Ketay



No. REA-05442

cc: Mr. Wyman Hong, Alameda County Flood Control and Water Conservation District (Zone 7), 5997 Parkside Drive, Pleasanton, CA 94566

California Department of Water Resources, 3251 S Street, Sacramento, CA 95816

Ms. Susan Hugo, Alameda County Health Care Services Agency, 1131 Harbor Bay Parkway, Suite 250, Alameda, CA 94502-6577

Mr. Kevin Graves, California Regional Water Quality Control Board - San Francisco Bay Region, 2101 Webster Street, Suite 500, Oakland, CA 94612



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

5997 PARKSIDE DRIVE

PLEASANTON, CALIFORNIA 94588-5127 PHONE (510) 484-2600 FAX (510) 462-3914

25 May 1995

RECEIVED

AQUA SCIENCE ENG.

Mr. Robert Kitay Aqua Science Engineers 2411 Old Crow Canyon Road, Suite 4 San Ramon, CA 94583

Gentlemen:

Enclosed is drilling permit 95328 for the destruction of wells 1S/4W 15C80 to 15C83 at the 1200 - 65th Street in Emeryville for the Oliver Rubber Company.

Please note that permit condition A-2 requires that a well destruction report be submitted after completion of the work. The report should include a description of methods and materials used to destroy the well, location sketch, date of destruction and permit number. Please submit the original of your completion report. We will forward your submittal to the California Department of Water Resources.

If you have any questions, please contact Craig Mayfield at extension 233 or me at extension 235.

Very truly yours,

Wyman Hong

Water Resources Technician II

WH:mm Enc.



1200 - 65th Street

APPLICANT'S

ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

5997 PARKSIDE DRIVE

PLEASANTON, CALIFORNIA 94566

(415) 484-2600

GROUNDWATER PROTECTION ORDINANCE PERMIT APPLICATION

	FOR A	PPLICA	NI TO CO	MPLE IEI		
LOCATION OF	PROJECT_	The	Oliver	Rubher	Com	pan
			1_			

Emryville CA
CLIENT Name The Oliver Rubber Company Address 1200.65th Street Phone (516) 654-7711 City Emeryville, of Zip 94608
APPLICANT
Name Agua Science Engineers
Name Agua Science Engineers 2411 Old Crow Canyon Rd #4 Address FAX (510) 837-4853 Phone (510) 820-939/ City San Ramon, CA Zip 94583
TYPE OF PROJECT
Well Construction Cathodic Protection Water Supply Monitoring Geotechnical Investigation General Contamination Well Destruction
PROPOSED WATER SUPPLY WELL USE Domestic Industrial Other Municipal Irrigation
DRILLING METHOD: Mud Rotary Air Rotary Auger × Cable Other
DRILLER'S LICENSE NO. 6-57 582696
WELL PROJECTS Drill Hole Diameter X in. Maximum Casing Diameter 2 in. Depth 25 ft. Surface Seal Depth 25 ft. Number 4
GEOTECHNICAL PROJECTS Number of Borings Maximum Hole Diameter In. Depth ft.
ESTIMATED STARTING DATE $5-31-95$ ESTIMATED COMPLETION DATE $6-30-95$
I hereby agree to comply with all requirements of this permit and Alameda County Ordinance No. 73-68.

Ball C. Kiley Date 5-22-95

OFF	

PERMIT NUMBER 95328

LOCATION NUMBER 1S/4W 15C80 to 15C83

PERMIT CONDITIONS

Circled Permit Requirements Apply

GENERAL

- A permit application should be submitted so as to arrive at the Zone 7 office five days prior to proposed starting date.
- 2. Submit to Zone 7 within 60 days after completion of permitted work the original Department of Water Resources Water Well Drillers Report or equivalent for well projects, or drilling logs and location sketch for geotechnical projects.
- 3. Permit is void if project not begun within 90 days of approval date.
- B. WATER WELLS, INCLUDING PIEZOMETERS
 - Minimum surface seal thickness is two inches of cement grout placed by tremle.
 - 2. Minimum seal depth is 50 feet for municipal and industrial wells or 20 feet for domestic and irrigation wells unless a lesser depth is specially approved. Minimum seal depth for monitoring wells is the maximum depth practicable or 20 feet.
- C. GEOTECHNICAL. Backfill bore hole with compacted cuttings or heavy bentonite and upper two feet with compacted material. In areas of known or suspected contamination, tremied cement grout shall be used in place of compacted cuttings.
- D. CATHODIC. Fill hole above anode zone with concrete placed by tremie.
- (E.) WELL DESTRUCTION. See attached.

Approved Myman Hong

Date 25 May 95

121989

ZONE 7 WATER RESOURCES ENGINEERING DRILLING ORDINANCE

OLIVER RUBBER COMPANY
1200 - 65TH STREET
EMERYVILLE
WELL 1S/4W 15C80 TO 15C83
PERMIT 95328

Destruction Requirements:

- 1. Drill out the well so that the casing, seal, and gravel pack are removed to the bottom of the well.
- Using a tremie pipe, fill the hole to 2 feet below the lower of finished grade or original ground with neat cement.
- 3. After the seal has set, backfill the remaining hole with compacted material.

These destruction requirements as proposed by Robert Kitay of Aqua Science Engineers meet or exceed the Zone 7 minimum requirements.

LOP - RECORD CHANGE REQUEST FORM

printed: 05/31/95

Mark Out What Needs Changing and Hand to LOP Data Entry (Name/Address changes go to Annual Programs Data Entry)

Insp: SH

AGENCY # : 10000 SOURCE OF FUNDS: F SUBSTANCE: 12034

: 1330 StID LOC:

SITE NAME: Oliver Rubber Co. DATE REPORTED : 07/01/92 DATE CONFIRMED: 06/24/92 MULTIPLE RPs : N ADDRESS: 1200 65th St

CITY/ZIP : Emeryville 94608

SITE STATUS

CASE TYPE: S CONTRACT STATUS: 4 PRIOR CODE:1C3 EMERGENCY RESP:

DATE COMPLETED: 07/21/92 RP SEARCH: S PRELIMINARY ASMNT: C DATE UNDERWAY: 06/25/92
REM INVESTIGATION: C DATE UNDERWAY: 10/01/92
REMEDIAL ACTION: C DATE UNDERWAY: 10/01/92
POST REMED ACT MON: DATE UNDERWAY: DATE COMPLETED: 10/01/92 DATE COMPLETED: 07/14/93

DATE COMPLETED: 07/14/93 DATE COMPLETED:

LUFT FIELD MANUAL CONSID: 2HSCAWG CASE CLOSED. V CASE CLOSED: Y

DATE EXCAVATION STARTED : 11/01/91 REMEDIAL ACTIONS TAKEN: ED

RESPONSIBLE PARTY INFORMATION

RP#1-CONTACT NAME: David Kuhre

COMPANY NAME: Oliver Tire & Rubber Company

ADDRESS: 1200 65th Street

CITY/STATE: Emeryville, California 94608

	INSPECTOR VERIFICA		
NAME SUSAY HUGO	SIGNATURE SULLA	~ & Augo	DATE 6/1/95
	DATA ENTRY INPU'	T:	
Name/Address Changes Only	,	Case Pro	gress Changes
ANNPGMS LOP	DATE	LOP	DATE

Mark Out What Needs Changing and Hand to LOP Data Entry (Name/Address changes go to Annual Programs Data Entry)

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StID : 1330

DATE REPORTED : 07/01/92 SITE NAME: Oliver Rubber Co. ADDRESS: 1200 65th St DATE CONFIRMED: 06/24/92

CITY/ZIP : Emeryville 94608 MULTIPLE RPs : N

SITE STATUS

CONTRACT STATUS: 4 PRIOR CODE:1C3 EMERGENCY RESP: CASE TYPE: S

RP SEARCH: S DATE COMPLETED: 07/21/92

PRELIMINARY ASMNT: C DATE UNDERWAY:
REM INVESTIGATION: DATE UNDERWAY:
REMEDIAL ACTION: DATE UNDERWAY:
POST REMED ACT MON: DATE UNDERWAY: DATE COMPLETED: DATE COMPLETED: DATE COMPLETED: DATE COMPLETED:

DATE ENFORCEMENT ACTION TAKEN: 07/21/92 LUFT FIELD MANUAL CONSID: HSCAWG CASE CLOSED:

DATE CASE CLOSED:

DATE CASE CLOSES

DATE EXCAVATION STARTED : REMEDIAL ACTIONS TAKEN: ED

RESPONSIBLE PARTY INFORMATION

RP#1-CONTACT NAME: Ron Kessler

COMPANY NAME: Oliver Tire & Rubber Company

ADDRESS: 1200 65th Street

CITY/STATE: Emeryville, California 94608

	INSPECTOR VERIFICATION:				
NAME		SIGNATURE _			DATE
		DATA ENTRY	INPUT:		
Name/Address	Changes Only		*11	Case I	Progress Changes
ANNPGMS	LOP	DATE		LOP _	DATE
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Mont Monne-letter -Just Swing?

California Laboratory Services

Analysis Report: CAM Metals, STLC, EPA Method 6010/7000 CA Waste Extraction Test (WET)

Client: TKS Consulting P.O. Box 1618

Project: GSA

Sutter Creek, CA 95685

Project No.:
Contact: Tim Smith

Phone: (209) 267-0903

CLS Contact: George Hampton Job No.: 793760 COC Log No.: 17354 CLS ID No.: M3760A-6A Batch No.: M940228A Matrix: SOIL

Date Sampled: 01/27/94
Date Received: 01/28/94
Date Leached: 02/23/94
Date Analyzed: 03/01/94
Date Reported: 03/07/94
Client ID No.: GSASP-2-1

Sample: GSASP-2-1

Analyte	CAS No.	Results (mg/L)	Rep. Limit (mg/L)	Method
Ag (Silver)	7440-22-4	ND	0.50	6010
As (Arsenic)	7440-38-2	0.22	0.050	7060
Ba (Barium)	7440-39-3	1.9	0.50	6010
Be (Beryllium)	7440-41-7	ND	0.10	6010
Cd (Cadmium)	7440-43-9	ND	0.10	6010
Co (Cobalt)	7440-48-4	ND	0.50	6010
Cr (Chromium)	7440-47-3	ND	0.50	6010
Cu (Copper)	7440-50-8	ND	0.50	6010
Hg (Mercury)	7439-97-6	ND	0.050	7471
Mo (Molybdenum)	7439-98-7	ND	0.50	6010
Ni (Nickel)	7440-02-0	ND	0.50	6010
Pb (Lead)	7439-92-1	1.4	0.50	6010
Sb (Antimony)	7440-36-0	ND	0.50	6010
Se (Selenium)	7783-00-8	ND	0.050	7740
Tl (Thallium)	7440-28-0	ND	5.0	6010
V (Vanadium)	7440-62-2	ND	0.50	6010
Zn (Zinc)	7440-66-6	1.3	0.50	6010

ND = Not detected at or above indicated Reporting Limit

Rep. Limit = Reporting Limit

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ALCO HAZMAT

94 MAR 22 PM 1: 30

March 7, 1994

Alameda County Health Care Services Agency

Attention: Ms. Susan L. Hugo 80 Swan Way, Room 350 Oakland CA 94621

Subject:

Site Closure Report

February 28, 1994

Oliver Rubber Company Emeryville, CA 94608

Dear Ms. Hugo:

Enclosed, please find one copy of the subject report prepared by ASE Environmental.

Please accept this report as a formal application for site closure (as indicated on page 1). This report was reviewed by our Oliver staff and our Standard Products Corporate Environmental personnel. We concur with its content, and findings, and look forward to bringing this project to a successful conclusion. Please note our request for site closure on page 7 (under "Recommendations"), we trust that this will be an acceptable resolution to this project.

Respectfully submitted,

OLIVER RUBBER COMPANY

THE STANDARD PRODUCTS COMPANY

Ronald L. Kessler

Division Manager

Tom O. Palmer

Director Environmental/Health & Safety

c: Mr. Rich Hiett - Regional Water Quality Control Board David Allen - ASE

Kuhre:USTclose.ltr



ENVIRONMENTAL STRATEGIES CORPORATION

ESC

101 Metro Drive * Suite 650 * San Jose, California 95110 * [408] 453-6100 * FAX (408) 453-0496

Jamuary 12, 1994

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

Dear Ms. Logan:

I am interested in obtaining information on the status of environmental investigations and remediation at several locations in the Oakland/Emeryville area including:

- Myers Drum Company (may be listed as Myers Container Corp.) 6549 San Pablo Avenue, Oakland, CA, 94608 W
- Oliver Rubber Company 1200 65th Street, Oakland, CA, 94608 U
- LSI Liquid Sugars Inc. 1285 66th Street, Emeryville, CA, 94608 L
- 1130 67th Street, Oakland, CA, 94608 V/A
- 1190 67th Street, Oakland, CA, 94608 N/A
- George M. Martin Inc. 1250 67th Street, Emcryville, CA, 94608

Specifically, I would like to determine the following for each site: whether there are any potential sources of soil or groundwater contamination, whether any environmental investigations have been performed, the extent of soil and groundwater contamination, and the status of remedial activities being conducted at the site. I am available to review files held by the Department of Health if this will expedite the release of this information.

Thank you for your assistance in setting up the file review. I can be reached at the telephone number U 1. Gave to JB-1/19/94

10:25-10:33 (8min)

1/20/94 & JB listed above if you have any questions or require any clarification. Your a

Sincerely yours,

Jacqueline P. Thiell

Senior Project Director

IPT liw 978



January 27, 1993

The Oliver Rubber Company Emeryville, CA 94662

ATTENTION: Mr. Ron Kessler

SUBJECT: Former Bunker Oil Tank

Oliver Rubber Emeryville, CA

CA ASE JOB NO.: 2571

\$0,577.15 177.02

Dear Mr. Kessler:

Aqua Science Engineers, Inc. (ASE) was contracted by the Oliver Rubber Company to perform overexcavation duties in the area of the former Bunker Oil tank on December 18, 1992. The overexcavated material, approximately 54 cubic yards, was stockpiled and covered on site. Samples of the stockpiled material were collected by ASE, and in turn were analyzed at a State of California certified environmental laboratory. The analysis was conducted for purposes of profiling for future disposal at a local landfill licensed to handle contaminated soil.

On January 15, 1993, the stockpiled material was transported, under Non-Hazardous Special Waste Manifest, and disposed of at the BFI, Vasco Road Landfill in Livermore, California. Attached are the original manifests for the client's file.

Further action at the site will consist of the activities associated with the quarterly groundwater monitoring program. ASE appreciates the opportunity to assist the Oliver Rubber Company with its environmental needs. Should questions or comments arise, please feel free to give us a call at (510) 820-9391.

Respectfully submitted,

AQUA SCIENCE ENGINEERS, INC.

Dand Will

David Allen

Project Manager

Attachments: Non-Hazardous Special Waste Manifests (3)

cc: Ms. Susan Hugo, ACHCSA

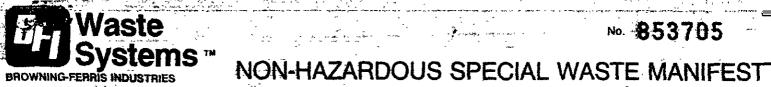
Mr. Rich Hiett. RWQCB, San Francisco Bay Region

LANGE CONTRACTOR CONTRACTOR



NON-HAZARDOUS SPECIAL WASTE MANIFEST

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	direct 1 5 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
4 a 19662	- Ch diffe Tas
	Phone No. 5 1 5 - 4 2 7 7 7 1
FI Weste Code Description of Waste	Containers Fyre D. Drum
Description of Waste	Quantity Units No. Type C Cartish
	Timek Pounds
	A Veros
	for itself as defined by 40 CFB Part 260 10 or any applicable
1 hereby certify that the above named material does not contain state law, is not a hazardous waste as defined by 40 CFR Part	
state law, is not a nazardous waste as defined by so classified and packaged, and is in proper condition for transporte	10 11 17 17 17 13 13 13 13 13 13 13 13 13 13 13 13 13
Senerator Authorized Agent Name Signature	Shipment Date
TRANSF	PORTER
Truck No	Phone No. (570) 487 - 3397
Transporter Name 0.7. Z	Driver Name (Print) RM MON NONTES
P.O. BOX 1622	Vehicle License No./State 2
UNION CITY CA 94581	Vehicle Certification Ch 982505369
Thereby certify that the above named material was picked up at the generator site listed above.	I hereby certify that the above named material was delivered with- out incident to the destination listed below.
at the generator site instead above.	1011593
Driver Skgnature Shipment Date	Driver Signature Date
DESTI	NATION
Site Name VASCO Frac Landful	Phone No. 5 1 2 - 4 4 7 18 4 9 11
Address 1001 N YAX'S RE LIVER MORE	(A. 94550
I hereby certify that the above named material has been accepted a	and to the best of my knowledge the foregoing is true and accurate.
·	Receipt Date
Name of Authorized Agent Signature	1 roospy bate
	PASS CODE



	NEDATOR
	NERATOR
Comperator Seases 10 Live T. L. Dec CO.	Generating Location Olive Rubber Co.
Bidgess 1200-65 St Enerythile	Address 1700 65 11 Emery Ville.
CA. 94662	CA 9462
	Priorie IVO.
BFI Waste Code CA 905 01119 Description of Waste	Quantity Units No. Type D-Drum
Soil Contaminated WHL oil + Gr	eAse 18 YOUT B-Bag
	T - Truck P - Pounds
	Y - Yards
	O - Other
I hereby certify that the above named material does not co	ntain free liquid as defined by 40 CFR Part 260.10 or any applicable Part 261 or any applicable state law, has been properly described,
classified and packaged, and is in proper condition for trans	sportation according to applicable regulations.
STEVE TOE Hope AND	
Generator Authorized Agent Name Signature	Shipment Date
TRA	NSPORTER
Truck No. 5316	Phone No. <u>5/5' 5/7 - 3377</u>
Transporter Name DJ I	Driver Name (Print) 658 Al Cos tylle
Address Pro 1622 Union City	Vehicle License No./State 32:/5337 (1591)
74587	Vehicle Certification CAD 982 505364
I hereby certify that the above named material was picked up	I hereby certify that the above named material was delivered with
at the generator site listed above.	out incident to the destination listed below
Josephall 61159	3 (000 600 0 155
Driver Signature Shipment Date	Driver Signature Delivery Date
	Driver Signature Delivery Date STINATION
Site Name VASCO ROAD LANGTIN	STINATION
Site Name VASCO ROAD LANDET IN Address 4001 W VASCO Rd Live	Phone No. 5 1 0 - 4 7 7 0 4 7 1
Site Name VASCO ROAD LANDET IN Address 4001 W VASCO Rd Live	Phone No. 5 1 0 - 4 7 7 0 4 7 1
Site Name VASCO ROAD LANDET IN Address 4001 W VASCO Rd Live	Phone No. 5 10 - 4 7 7 0 4 7 1 Phone No. 5 10 - 4 7 7 0 4 7 1 Phone Thore 94550 and and to the best of my knowledge the foregoing is true and accurate.
Site Name VASCO ROAD Landfill Address HOO! N VASCO Rd Live I hereby certify that the above named material has been accepted	Phone No. 5 10 - 4 7 7 0 4 7 1 Phone No. 5 10 - 4 7 7 0 4 7 1 Phone Thore 94550 and and to the best of my knowledge the foregoing is true and accurate.



NON-HAZARDOUS SPECIAL WASTE MANIFEST

GENE	RATOR
100	
Generator Name Oliver Rubber Co.	
Address 1200 65th St Eneryville	Address 1200 65+1 St. Emeravuille
Cn 94662	CA 94660
Phone No. 510 6547711	Phone No. 5 1 0 - 6 3 4 7 7 1 1
BFI Waste Code CA 4 5 5 6 1 1 1 9 6	Quantity Units No. Type D-Drum
Soil Cornaminated With 0114 Grease	
	T - Truck
	P - Pounds Y - Yards
	O - Other
I hereby certify that the above named material does not contain	in free liquid as defined by 40 CFR Part 260.10 or any applicable
classified and packaged, and is in proper condition for transpor	art 261 or any applicable state law, has been properly described, relation according to applicable regulations.
STEVE De Hour The	4.
Generator Authorized Agent Name Signature	Shipment Date
TRANS	SPORTER
Truck No. K 35 7	Phone No
Transporter Name	Driver Name (Print) Romon MonTes
The state of the s	Vehicle License No./State 2//06 2/6 CF
47087	Vehicle Certification 14 1 14 3 35 36 4
I hereby certify that the above named material was picked up at the generator site listed above.	I hereby certify that the above named material was delivered with out incident to the destination listed below.
1 2	
Driver Signature Shipment Date	Driver Signature Delivery Date
DEST	NATION
Site Name VAXO BOAG LANGIN	Phone No. 5 1 0 - 4 4 7 6 4 7 1
Address 4001 N VASCO 12d. LIVERPORE	
	•
I hereby certify that the above named material has been accepted a	and to the best of my knowledge the foregoing is true and accurate
Name of Authorized Agent	- Light
Name of Authorized Agent Signature	Receipt Date

PASS CODE ____



January 5, 1993

Alameda County Health Care Services Agency Attention: Ms. Susan L. Hugo 80 Swan Way, Room 350 Oakland CA 94621

Subject: Final Report

Bunker-Oil Overexcavation Activities

Oliver Rubber Company Emeryville, CA 94608

Dear Ms. Hugo:

Enclosed, please find one copy of the subject report prepared by ASE Environmental.

This report was reviewed by our Oliver staff and our Standard Products Corporate Environmental personnel. We concur with its content, and findings, and look forward to bringing this project to a successful conclusion.

Respectfully submitted,

OLIVER RUBBER COMPANY

THE STANDARD PRODUCTS COMPANY

Ronald L. Kessler

Division Manager

Tom O. Palmer

Director Environmental/Health

and Safety

Mr. Rich Hiett - Regional Water Quality Control Board

David Allen - ASE

Subsidiary of THE STANDARD PRODUCTS co.

Olive/Rubbe

- ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

SIZA

DAVID J. KEARS, Agency Director

December 1, 1992 STID# 1330 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

Mr. Ron Kessler Oliver Rubber Company 1200 65th Street Emeryville, California 94608

RE: Additional Investigation/Remediation at Oliver Rubber Company - 1200 65th Street, Emeryville, California 94608

Dear Mr. Kessler:

The Alameda County Department of Environmental Health, Hazardous Materials Division has completed review of the "Project Update, Phase II Activities for the Oliver Rubber Company", dated October 21, 1992, and submitted by Aqua Science Engineers.

Soil borings SB-1, SB-2 and MW-1 (all borings taken at 10 feet bgs) showed non detect levels for the following target compounds: total petroleum hydrocarbon as diesel (TPHd), benzene, toluene, ethylbenzene, xylenes, and oil & grease. It appears that the extent of soil contamination associated with the former bunker oil tank is limited to the area approximately 5 feet in distance around the tank excavation. The three sidewall samples collected after limited overexcavation during the tank removal activity exhibited significant levels of petroleum hydrocarbon contamination: SW-N (1500 ppm TOG, 490 ppm TPHd); SW-W (670 ppm TOG, 390 ppm TPHd); SW-S (1300 ppm TOG, 1300 ppm TPHd).

The levels of contamination that remain in the soil around the tank pit requires further remediation to non detect levels before the site can be recommended for case closure to RWQCB. In addition, groundwater monitoring well samples must exhibit four consecutive quarters of non detect levels of target compounds.

However, if no remediation will be conducted to reduce the levels of soil contamination at the site, the following items must be performed:

- * Long term monitoring of wells at the site
- * Risk assessment to determine the impact and/or threat to the public health and the environment
- * Deed restriction on the property
- * Feasibility study which must show all alternative methods of remediation applicable to the site and their corresponding cost (which method is economically feasible for the site)

Mr. Ron Kessler RE: 1200 65th Street, Emeryville 94608 December 1, 1992 Page 2 of 3

Per my telephone conversation with Steve de Hoppe of Aqua Science Engineers on November 30, 1992, it is my understanding that overexcavation will be performed around the three sidewalls with petroleum hydrocarbon contamination. Verification samples must be collected and analyzed for TPH diesel, benzene, toluene, ethyl benzene, xylene and oil and grease. The excavation pit must be backfilled with only clean fill. Please notify this office at least 48 hours in advance when overexcavation will commence so that a site visit can be arrange during the sampling.

This department has not received the complete report on the groundwater contamination assessment performed on October 1, 1992. The report must be submitted to this office no later than December 11, 1992.

Until cleanup is complete, you will need to submit reports to this office and to RWQCB every three months (or at a more frequent interval, if specified at any time by either agency). In addition, the following items must be incorporated in your future reports or workplans:

- a cover letter from the responsible party or tank owner stating the accuracy of the report and whether he/she concurs with the conclusions and recommendations in the report or workplan
- site map delineating contamination contours for soil and groundwater based on recent data should be included and the status of the investigation and cleanup must be identified
- proposed continuing or next phase of investigation / cleanup activities must be included to inform this department or the RWQCB of the responsible party or tank owner's intention
- any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained
- historical records of groundwater level in each well must be tabulated to indicate the fluctuation in water levels
- tabulate analytical results from all previous sampling events; provide laboratory reports (including quality control/quality assurance) and chain of custody documentation

Mr. Ron Kessler RE: 1200 65th Street, Emeryville 94608 September 24, 1992 Page 3 of 3

All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project. Copies of reports must also be submitted to:

Rich Hiett RWQCB, San Francisco Bay Region 2101 Webster Street, Fourth Floor Oakland, California 94612

Because we are overseeing this site under the designated authority of the Regional Water Quality Control Board, this letter constitutes a formal requests for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency or RWQCB.

Please contact me at (510) 271-4530 if you have any questions concerning this letter.

Sincerely,

Susan L. Hugo

Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health Rich Hiett, San Francisco Bay RWQCB Mark Thomson, Alameda County District Attorney's Office Edgar B. Howell, Chief, Hazardous Materials Division - files David Allen - Aqua Science Engineers, Inc. 2411 Old Crow Canyon Road, # 4 San Ramon, California 94583

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

September 24, 1992 STID# 1330

Mr. Ron Kessler Oliver Rubber Company 1200 65th Street Emeryville, California 94608

RE: Oliver Rubber Company

1200 65th Street, Emeryville, California 94608

Dear Mr. Kessler:

The Alameda County Department of Environmental Health, Hazardous Materials Division has recently reviewed the files concerning the removal of three underground storage tanks at the referenced site. This office is also in receipt and has completed its review of the "Workplan for Groundwater Contamination Assessment" dated September 10, 1992 submitted by Aqua Science Engineers Inc.

Based on this review, this department concurs with the basic elements of the workplan. However, the following issues must be addressed before the workplan can be implemented:

- * Soil sample (SW-W) collected after limited overexcavation in June 25, 1992 on the west wall of the former bunker oil underground storage tank excavation still showed considerable levels of contamination. Total petroleum hydrocarbon as diesel (130 ppm), oil & grease (450 ppm), benzene (19 ppb), toluene (6.7 ppb), xylene (33 ppb) were detected. The lateral extent of soil contamination in the area west of the former bunker oil tank excavation must be determined.
- * Stockpiled soil from the former bunker oil tank contained significant levels of semi-volatile organics, specifically 2-Methylnaphthalene (0.38 ppm). Analysis of the soil and groundwater samples collected in the area of the former bunker oil tank must include Method 8270 for Semi-Volatile Organics in addition to Total Petroleum Hydrocarbon as diesel (TPH-d), oil & grease (0 & G), and benzene, toluene, ethyl benzene, xylene (BTEX).
- * Please explain how the protocol for one soil sample per hole will be selected for laboratory testing. Soil samples must be collected every five feet as per RWQCB's guidelines. Field instruments are acceptable as a screening tools only. Any evidence of soil contamination such as odor, visual staining or field instrument readings must be verified by analysis from a state certified laboratory.

Mr. Ron Kessler RE: 1200 65th Street, Emeryville 94608 September 24, 1992 Page 2 of 3

- * Groundwater elevation readings must be performed every month for twelve consecutive months and reduced to every quarter after the first year. Groundwater monitoring wells must be sampled on a quarterly basis and analyzed for target compounds. MW-1 must be analyzed for TPH-d, BTXE, semivolatile organics (8270), oil & grease. MW-2 and MW-3 must be sampled for TPH-g, BTXE and volatile organic compounds (8240). After four quarters of non detectable levels have been achieved, the frequency of sampling events will be evaluated and/or a recommendation for signoff/case closure by RWQCB will be determined.
- * Please submit a time schedule for all phases of the investigation and remediation activities and the anticipated time when cleanup will be completed at the site.

A report must be submitted within 30 days after completion of this investigation. Until cleanup is complete, you will need to submit reports to this office and to RWQCB every three months (or at a more frequent interval, if specified at any time by either agency). In addition, the following items must be incorporated in your future reports or workplans:

- a cover letter from the responsible party or tank owner stating the accuracy of the report and whether he/she concurs with the conclusions and recommendations in the report or workplan
- site map delineating contamination contours for soil and groundwater based on recent data should be included and the status of the investigation and cleanup must be identified
- proposed continuing or next phase of investigation / cleanup activities must be included to inform this department or the RWQCB of the responsible party or tank owner's intention
- any changes in the groundwater flow direction and gradient based on the measured data since the last sampling event must be explained
- historical records of groundwater level in each well must be tabulated to indicate the fluctuation in water levels
- tabulate analytical results from all previous sampling events; provide laboratory reports (including quality control/quality assurance) and chain of custody documentation

Mr. Ron Kessler

RE: 1200 65th Street, Emeryville 94608

September 24, 1992

Page 3 of 3

All reports and proposals must be submitted under seal of a California Registered Geologist or Registered Civil Engineer with a statement of qualifications for each lead professionals involved with the project. Copies of reports must also be submitted to:

Rich Hiett RWQCB, San Francisco Bay Region 2101 Webster Street, Fourth Floor Oakland, California 94612

Because we are overseeing this site under the designated authority of the Regional Water Quality Control Board, this letter constitutes a formal requests for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of stated deadlines or changes in the workplan must be confirmed in writing and approved by this agency or RWQCB.

Please contact me at (510) 271-4530 if you have any questions concerning this letter.

Sincerely,

Susan L. Hugo 🛭

Susan L. Guar

Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Asst. Agency Director, Environmental Health Rich Hiett, San Francisco Bay RWQCB Mark Thomson, Alameda County District Attorney's Office Edgar B. Howell, Chief, Hazardous Materials Division - files David Allen - Aqua Science Engineers, Inc.

2411 Old Crow Canyon Road, # 4 San Ramon, California 94583

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY DEPARTMENT OF ENVIRONMENTAL HEALTH HAZARDOUS MATERIALS DIVISION 80 SWAN WAY, ROOM 200 OAKLAND, CA 94621 PHONE NO. 415/271-4320 94621

ACCEPTED

DEPARTMENT OF ENVIRONMENTAL HEALTH 470 - 27th Street, Third Floor Oakland, CA 94612

Telophone: (415) 874-7237

able and essentially meet the requirements of State and local hoalth laws Changes to your plans indicated by this laws. The project proposed herein is now released for issu-These plans have been reviewed and found to be accept-Department are to assure compliance with State and local anno of any required building permits for construction.

One copy of these accepted plans must be on the job and one like involved with the romoval

Any shave or alterations of those plans and specifications Building Inspection Department to dotormino if such Plotfy this Department at least 48 hours prior to the must be submitted to this Decartment and to the Fire and changes meet the roquirements of State and local laws. Inspections: Mowing required

Removal of Tank and Piping Final Inspection

plance with accepted plans and all applicable laws and Insurance of a permit to oparate is dependent on

THERE IS A FINANCIAL PENALTY FOR NOT OBTAIN.NG THESE INSPECTIONS. ragulations.

UNDERGROUND TANK CLOSURE PLAN Complete according to attached instructions

1.	Business Name OLIVER RUBBER CO.
	Business Owner STANDARD PRODUCTS CO.
2.	Site Address 1259 65th STREET
	city <u>EMERYVILLE</u> zip <u>94608</u> Phone <u>654-7711</u>
3.	Mailing Address P.O. Box 8447
	city <u>OAKLAND</u> , <u>CA</u> zip <u>94608</u> Phone 654-7711
4.	Land Owner OLIVER RUBBER Co.
	Address 1200 65 th ST city, State EMERYVILLE, CA Zip 94608
5.	Generator name under which tank will be manifested
	OLIVER RUBBER CO.
	EPA I.D. No. under which tank will be manifested <u>CAC000679616</u>

6.	contractor AQUA SCIENCE ENGINEERS
	Address 1041 SHARY CIRCLE
	city <u>CONCORD</u> , <u>CA</u> Phone (510) 685-6700
	License Type <u>ENG. A</u> ID# <u>487000</u>
7.	Consultant AQUA SCIENCE ENGINEERS
	Address 1041 SHARY CIRCLE
	city <u>Concord</u> , (A Phone (510) 685-6700
8.	Contact Person for Investigation
	Name DAVID PRULL TITLE PROJECT MANAGER
	Phone (510) 685-6700
9.	Number of tanks being closed under this plan
	Length of piping being removed under this plan Oft.
	Total number of tanks at facility Z
10.	State Registered Hazardous Waste Transporters/Facilities (see instructions).
	** Underground tanks are hazardous waste and must be handled ** as hazardous waste
	a) Product/Residual Sludge/Rinsate Transporter
	Name <u>Waste OIL Reco.</u> EPA I.D. No. <u>CAD000626515</u>
	Hauler License No. CAL-PUC-106399 License Exp. Date 4/97
	Address 640/ LEONA STREET
	City OAKLAND State C4 Zip 94605
	b) Product/Residual Sludge/Rinsate Disposal Site
	Name DEMENNO KERDOON EPA I.D. No. CATOBOOI 3352
	Address ZOOO N. ALAMEDA
	city Compton State CA Zip GOZZI

c) Tank and Piping Transporter	
Name <u>FRICKSON</u> , INC. EPA I.D. No. CADOO9466	<u> 39</u> Z
Hauler License No. 00/9 License Exp. Date 5-9	<u>Z</u>
Address Z55 PARR BOUCEVARD	—————
Address Z55 PARR BOULEVARD City RICHMOND State CA Zip 94801	
d) Tank and Piping Disposal Site	
Name <u>ERICKSON</u> , INC. EPA I.D. No. <u>CAD 00946</u>	<u>63</u> 9Z
Address 255 PARR BOULEVARD	
City <u>fich month</u> State <u>O4</u> Zip <u>G4801</u>	
11. Experienced Sample Collector	
Name DAVID C. PRULL	-
Company AQUA SCIENCE ENGINEERS	_
Address 1041 SHARY CIRCLE	
Address	- 6700
12. Laboratory	
Name CHROMALAB, INC.	
Address ZZ39 OMERA RD. #1	
city SAN RAMON State CA Zip 94583	
State Certification No	
13. Have tanks or pipes leaked in the past? Yes [] No []	
If yes, describe.	

14. Describe methods to be used for rendering tank inert

	ICE	AT A	PATE	OF	1.5	FOUNDS	
PER	100	GALLONS	OF	TAN	1	VolumE	
1		minim v.					

Before tanks are pumped out and inerted, all associated piping must be flushed out into the tanks. All accessible associated piping must then be removed. Inaccessible piping must be plugged.

The Bay Area Air Quality Management District (771-6000), along with local Fire and Building Departments, must also be contacted for tank removal permits. Fire departments typically require the use of explosion proof combustible gas meters to verify tank inertness. It is the contractor's responsibility to bring a working combustible gas meter on site to verify tank inertness.

15. Tank History and Sampling Information

Tank		Material to	T	
Capacity	Use History (see instructions)	<pre>be sampled (tank contents, soil, ground- water, etc.)</pre>	Location and Depth of Samples	
500 gm.	INSTALLATION DATE UNKNOWN LAST USE DATE UNKNOWN TANK CURRENTLY CONTAINS LOW GRADE "BUNKER OIL"	SOIL G GROUNDWATER INTERFACE OR Z'BELOW TANK INVERT GROUNDWATER IF ENCOUNTERED	D SAMPLE MIDDLE OF TANK APPROX. G.O ST. BELOW GRADE D WATER SAMPLE IF SAMPLE IF SAUNDWITTER	

One soil sample must be collected for every 20 feet of piping that is removed. A ground water sample must be collected should any ground water be present in the excavation.

	Excavated/Stockpiled Soil
Stockpiled Soil Volume (Estimated)	Sampling Plan I SAMPLE, COLLATED FROM 4 SUB- SAMPLES SELECTED RANDOMLY, ANALYZE FOR TANK CONTENT Stock piled soil must be character

Stockpiled soil must be placed on bermed plastic and must be completely covered by plastic sheeting.

completely covered by bigstic sugering.

16. Chemical methods and associated detection limits to be used for analyzing samples

The Tri-Regional Board recommended minimum verification analyses and practical quantitation reporting limits should be followed. See attached Table 2.

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit	
BUNKER OIL (FUEL OIL)	EPA 6C-FID (3550)	3550	1. ppm	
TOTAL OIL E' GREASE TPH-diesel BTX &E	5MNDARD 5520 METHED 5520 E & F -3550-	577WDARD 5520 METHOD E & F & C-FID — \$020 00 8240 —	50 ppm (8 1.0 ppm (8 -,005 ppm (8	oil) sil)

17. Submit Site Health and Safety Plan (See Instructions)

-	•
18.	Submit Worker's Compensation Certificate copy
	Name of Insurer OHIO CASUALTY GROUP
19.	Submit Plot Plan (See Instructions)
20.	Enclose Deposit (See Instructions)
21.	Report any leaks or contamination to this office within 5 days of discovery. The report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report form. (see Instructions)
22.	Submit a closure report to this office within 60 days of the tank removal. This report must contain all the information listed in item 22 of the instructions.
	eclare that to the best of my knowledge and belief the statements information provided above are correct and true.
be r	nderstand that information in addition to that provided above may needed in order to obtain an approval from the Department of ironmental Health and that no work is to begin on this project il this plan is approved.
	nderstand that any changes in design, materials or equipment will distributed that any changes in design, materials or equipment will
in of	nderstand that all work performed during this project will be done compliance with all applicable OSHA (Occupational Safety and Health inistration) requirements concerning personnel health and safety. Inderstand that site and worker safety are solely the responsibility the property owner or his agent and that this responsibility is not red nor assumed by the County of Alameda.
worl	e I have received my stamped, accepted closure plan, I will tact the project Hazardous Materials Specialist at least three king days in advance of site work to schedule the required pections.
Sign	nature of Contractor
3	Name (please type) DAUID C. FRULL
	Signature C. Frull
1	Date 3/23/9Z

Signature

Date

Signature

Office

Signature

Signature of Site Owner or Operator

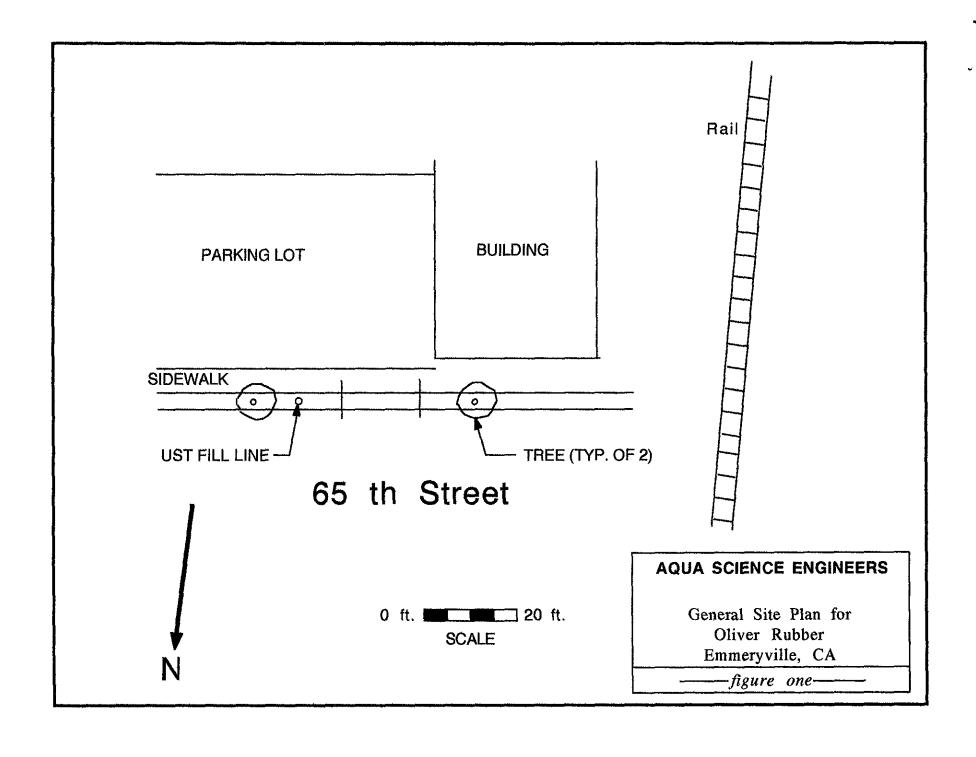
Name (please type)

Signature

RON Kessler

Date

3/27/97



HEALTH & SAFETY PLAN

for the

OLIVER RUBBER JOBSITE 1259 65th STREET EMERYVILLE, CA

prepared by

Aqua Science Engineers, Inc. 1041 Shary Circle Concord, CA 94518 1 (800) 678-9391

AQUA SCIENCE ENGINEERS, INC. HEALTH & SAFETY PLAN for the OLIVER RUBBER JOBSITE

A. GENERAL DESCRIPTION

Site: 1259 65TH STREET, EMERYVILLE CALIFORNIA

Work Scope: 1. PROVIDE EXCAVATION SERVICES FOR TANK REMOVAL.

2. PROVIDE EXTRICATION OF ONE 500 GALLON

UNDERGROUND STORAGE TANKS.

3. SAMPLE SOIL AND WATER UPON SUCCESSFUL COMPLETION OF TANK REMOVAL. EXECUTE

BACKFILLING OPERATIONS.

4. RESURFACE EXCAVATION AREA AND RESTORE TO PREVIOUS USABLE CONDITION.

NOTE: UST CURRENTLY CONTAINS "BUNKER OIL," LOW GRADE FUEL OIL.

SAFETY POLICY:

This Health and Safety Plan is written specifically for the Oliver Rubber jobsite, located at 1259 65th Street, Emeryville California. This plan does <u>not</u> include specific procedures for tank removal and/or soil offhaul, but addresses hazards associated with these and related activities. All persons on site will follow OSHA safe operating practices as outlined in 29 CFR 1910 and 1926, as well as established guidelines from their respective companies or organizations.

Plan Prepared by: David Prull Date: 3/23/92

Plan Approved by: David Prull Date: 3/23/92

Proposed Start Date: April 7, 1992

Overall Hazard Level: Serious: Low:

Moderate: XX Unknown:

Project Organization:

Site Manager for A.S.E.: Steve DeHope A.S.E. Safety Officer: David Prull Other A.S.E Personnel: Craig Hertz

B. SITE/WASTE CHARACTERISTICS

Waste Type(s):

Solid: XX

Sludge:

Liquid: XX

Gas:

Characteristics: PETROLEUM FUEL RESIDUALS, FLAMMABLE, TOXIC

Site Parameter: THE EXCAVATION PIT AS WELL AS ANY STOCKPILED MATERIAL ARE IDENTIFIED AS EXCLUSION ZONES. A MINIMUM BOUNDARY OF THREE FEET SURROUNDING

BOTH IS TO BE MAINTAINED IN AS MUCH AS IS

POSSIBLE, AT NO TIME SHALL ANY PERSONNEL ENTER THE EXCAVATION WITHOUT A SAFETY WATCH PERSON

STANDING BY OBSERVING THE ENTRY PERSON'S

ACTIVITY.

C. HAZARD EVALUATION

CHEMICAL HAZARDS

Potential chemical hazards include skin and eye contact or inhalation exposure to potentially toxic concentrations of hydrocarbon vapors. The potential toxic compounds that may exist at the site are listed below, with descriptions of specific health effects of each. The list includes the primary potential toxic constituents that may be found in gasoline, and the ingredients that are found in the petroleum solvent residue of the second tank. (excerpted from NIOSH Pocket Guide to Chemical Hazards, June 1990).

GASOLINE TANK

1. BENZENE

- a. Colorless, clear, highly flammable liquid (class 1B) with characteristic odor.
- b. High exposure levels may cause acute restlessness, convulsions, depression, respiratory failure. BENZENE IS A SUSPECTED CARCINOGEN.
- c. Permissible exposure level (PEL) for a time weighted average (TWA) over an eight hour period is 1.0 ppm.

2. TOLUENE

- a. Colorless, flammable liquid (class 1B) with a sweet benzene-like odor.
- b. High exposure levels may cause fatigue, euphoria, confusion, dizziness. TOLUENE IS LESS TOXIC THEN BENZENE.
- c. PEL for a ten hour TWA is 100 ppm.

- 3. XYLENE
- a. Colorless, flammable liquid (class 1B or 1C depending on isomers) with aromatic odors.
- b. high exposure levels may case dizziness, drowsiness, narcosis.
- c. PEL for a ten hour TWA is 100 ppm.

4. ETHYLBENZENE

- a. Clear, colorless, highly flammable liquid (class 1B) with characteristic odor.
- b. High exposure levels may cause irritation to skin, nose and throat, constriction in chest, loss of consciousness, respiratory failure.
- c. PEL for an eight hour TWA is 100 ppm.

ALL SUBSTANCES AS THEY EXIST ON SITE ARE EXPECTED TO BE STABLE.

Site Status: ACTIVE: XX INACTIVE:

Site History: THE SITE IS CURRENTLY PARKING AREA ASSOCIATED WITH A RUBBER PRODUCT MANUFACTURING PLANT. A FACILITIES BUILDING HISTORICALLY LOCATED AT THE SITE.

PHYSICAL HAZARDS

No person will climb on any excavated material piles without a safety person observing that activity. Personnel shall otherwise maintain the maximum distance possible from the pit while performing their activities. On-site hazards include physical injuries due to the proximity of workers to engine-driven heavy equipment and tools. Equipment used during excavation may include a backhoe or other excavator, a crane for lifting the tanks and a mechanical tamper or other equipment as part of the subsequent backfilling operations. Only trained personnel will operate machines, tools and equipment; all equipment will be kept clean and in good repair. MANDATORY SAFETY CLOTHING REQUIRED AROUND HEAVY EQUIPMENT WILL INCLUDE A HARDHAT AND STEEL-TOED BOOTS AT A MINIMUM.

ALL WORK WILL BE PERFORMED IN ACCORDANCE WITH OSHA GUIDELINES.

Daily inspections of the excavation, the adjacent areas, and protective systems are to be made by a qualified person while personnel are on site. Attention will be made to note if any evidence of potential cave-in exists.

HAVE AT LEAST ONE DRY CHEMICAL MODEL PA-200 A-B-C FIRE EXTINGUISHER PRESENT.

LEVEL OF PROTECTION

A contamination Reduction Zone (CRZ) will be maintained and adjusted as work proceeds and moves around the site. The workers on site will wear level 'D' protective clothing. (This protection level may be upgraded after on-site conclusions of data are completed). THE LEVEL OF PROTECTION FOR PERSONNEL WORKING IN THE AREA WILL BE UPGRADED IF; the organic vapor levels in the equipment operator's breathing zone exceeds 5 ppm above background levels continuously for more then five minutes. In this event, personnel protective equipment will include full face respirators with double-cartridge filters for organic vapors and particulates, in addition to hardhat, steel-toed boots and coveralls. Excavation will cease, equipment shutdown, and personnel will withdraw from the area if either 1.) the organic concentration in the operator's breathing zone exceeds 200 ppm for 5 minutes or 2.) the organic vapor concentration two feet above the excavation exceeds 2,000 ppm or 25% of the lower explosive limit. If work proceeds in an environment where organic vapor concentrations exceed 200 ppm, a self contained breathing apparatus or airline respirator will be utilized by the personnel.

Levels of Protective Clothing are defined on the following pages as described in the "EPA Standard Operating Safety Guidelines":

LEVEL A PROTECTION

Components:

- 1.) Pressure-demand, supplied air respirator that is MSHA and NIOSH approved. Respirators may be pressure demand, self contained breathing apparatus (SCBA), or pressure demand, airline respirator with an escape bottle for atmospheres with an extreme IDLH.
- 2.) Fully encapsulating chemical resistant suit.
- 3.) Inner, chemical resistant gloves.
- 4.) Disposable gloves and boot covers, worn over the fully encapsulating suit.
- 5.) 2-way radio communications is highly recommended.

LEVEL B PROTECTION Components:

- 1.) Pressure-demand, supplied air respirator that is MSHA and NIOSH approved. Respirators may be pressure demand, self contained breathing apparatus (SCBA), or pressure demand, airline respirator with an escape bottle for atmospheres with an extreme IDLH.
- 2.) Chemical resistant clothing which includes overalls and long sleeved jacket or, hooded one or two piece chemical splash suit or disposable chemical resistant one piece suit..
- 3.) Outer chemical resistant gloves.
- 4.) Inner chemical resistant gloves.
- 5.) Chemical resistant, steel toed and shank boots.
- 6.) Disposable chemical resistant boot covers.
- 7.) Hardhat.
- 8.) 2-way radio communications is highly recommended.

LEVEL C PROTECTION

Components:

- 1.) Air purifying respirator, full face, with twin cartridge or cannister equipped filters, that are MSHA and NIOSH approved.
- 2.) Chemical resistant clothing which includes coveralls or, hooded one-piece or two-piece chemical splash suit or chemical resistant hood and apron; disposable chemical resistant coveralls.
- 3.) Outer chemical resistant gloves.
- 4.) Inner chemical resistant gloves.
- 5.) Chemical resistant, steel toed and shank boots.
- 6.) Disposable chemical resistant boot covers.
- 7.) Hardhat.
- 8.) 2-way radio communications is recommended.

LEVEL D PROTECTION

-Components:

- 1.) Coveralls.
- 2.) Gloves.
- 3.) Leather boots, shoes or chemical resistant, with steel toe and shank.
- 4.) Safety glasses or chemical splash goggles.
- 5.) Hardhat or face shield.

COMBUSTIBLE GAS AND ORGANIC VAPOR MONITORING

Site personnel will monitor ambient levels of combustible gas vapors using a Thermo Environmental Instruments model 580A or a Gastech model GX-88 OVM. Volatile organic vapor levels greater then 5 ppm above background levels in the hot zone are not anticipated. If the OVM measurements do not decrease below 5 ppm, level 'C' protection will be required. The site Project Manager will be notified if organic vapor levels in the air samples exceed ambient concentrations.

A wetting agent or some form of dust control is recommended to reduce the airborne dust level and subsequent particulate hazard. HEPA respirator cartridges are also recommended as needed.

SITE ENTRY PROCEDURES

Any personnel entering the site will observe all conditions set forth by the owner of the property, including vehicle travel speeds, restricted areas and conduct.

Eating, drinking, smoking and other practices which increase the probability of hand-to-mouth transfer of contamination is prohibited in the work zone. All field personnel will be instructed to thoroughly wash their hands and face upon leaving the work area for breaks or cessation of day's activities. A first aid kit and at least one 20 pound A-B-C fire extinguisher will be available at the site.

DECONTAMINATION PROCEDURES

If required, equipment and personnel decontamination areas will be designated by the Project Manager at the start of the project. To prevent the transfer of contamination from the work site into clean areas, all tools will be cleaned adequately prior to final removal from the work zone. Protective clothing such as Tyvek coveralls, latex gloves, boot covers, etc. will be changed on a daily basis or at the discretion of the Project Manager on site. All disposable protective clothing will be put into plastic bags and disposed of in a proper manner. All respirator cartridges will be discarded and replaced with fresh units on a daily basis, disposal will be in the same manner as the protective clothing. Excavated soils will be stockpiled in an area designated by the Project Manager, until chemical analysis has been performed on representative samples.

In the event of a medical emergency, the injured party will be taken through decontamination procedures, if possible. However, the procedures may be omitted when it may aggravate or cause further harm to the injured party. Member of the work team will accompany the injured party to the medical facility to advise on matters concerning chemical exposure.

Personnel Protection Level will be Level 'D'. Protective clothing levels may be upgraded in the event that on site conclusions determine a greater then anticipated danger to personnel.

SPECIAL CONDITIONS

Site Entry: NORMAL, NO SPECIAL CONDITIONS

Decontamination-

Personnel and Equipment: IF REQUIRED, PERSONNEL AND EQUIPMENT

WILL BE DECONTAMINATED A PER USEPA

STANDARD OPERATING SAFETY

GUIDELINES. A SMALLER MODIFIED

DECONTAMINATION LINE MAY BE USED DUE

TO SPACE RESTRICTIONS.

Work Limitations (time, weather):

NONE ARE ANTICIPATED, HOWEVER, PERSONNEL WORKING ON SITE MAY EXPERIENCE ELEVATED TEMPERATURES DURING THE WORK DAY. IN THE EVENT THAT AMBIENT TEMPERATURES REACH OR EXCEED 80 DEGREES FAHRENHEIT, THE FOLLOWING GUIDELINES ARE RECOMMENDED.

- 1. Periods of work should be reduced to no less then one hour time frames and separated by breaks intended to reduce personnel stress due to reduced natural ventilation from wearing protective clothing.
 - 2. All personnel wearing level C protective clothing or greater, will be subject to medical monitoring of body temperature after work periods, by the following guidelines;
 - a. Heart Rate (HR) should be measured by counting the radial pulse rate for 30 seconds and doubling count for the correct pulse rate. This should be done as early as possible in the resting period. The HR at the beginning of the rest period should not exceed 110 beats per minute. If the HR is higher, the next work period should be shortened by 10 minutes, while the length of the rest period remains the same. If the HR is 100 beats per minute at the beginning of the next rest period, the following work period should be shortened by an additional 10 minutes.
 - b. Body temperatures should be measured orally with a clinical thermometer as soon as possible in each resting period. Oral Temperatures (OT) should not exceed 99 degrees Fahrenheit. If it does, the next work period should be reduced by 10 minutes while the length of the resting period remains the same. If the OT exceeds 99 degrees Fahrenheit at the beginning of the next work period, the following work period should be reduced by an additional 10 minutes. OT should be measured at the end of each rest period to ensure that the body's temperature has dropped below 99 degrees Fahrenheit.

Body Water Loss (BWL) from sweating, could result in dehydration and further complications and stress on personnel working in protective clothing under adverse weather conditions. It is strongly recommended that plenty of stress relief beverages be available on site to replace body fluids. Commercial drink mixes that provide electrolyte balancing solutions or water are adequate for replacing body fluids.

Alternate methods of heat stress reduction can be made available such as,

Portable showers or hose-down facilities, Shelter cover to protect against direct sunlight, Rotating teams of personnel wearing protective clothing, Performing extremely arduous tasks early in the workday.

EMERGENCY INFORMATION

In the event of an injury or suspected chemical exposure, the first responsibility of the Project Manager will be to prevent any further injury. This objective will normally require an immediate stop to work until the situation is remedied. The Project Manager may order the evacuation of the work party. Other primary responsibilities in the event of an accident will be the first aid and decontamination of the injured team member(s). The injured party will be moved to a designated safe area and initial first aid will be rendered.

Employees are asked to make every effort and take personnel responsibility to prevent accidents involving machinery or any other aspect of the job, either by individual action or by notifying the Project Manager immediately of any unsafe condition that may exist.

In the event of an unexpected hazardous material discovery on site, the following actions will be taken by any employee involved;

- 1. The person having uncovered the unexpected material will notify the Project Manager and other workers of the danger. The site will be cleared of personnel if deemed necessary by the Project Manager. If site evacuation is required, appropriate local agencies such as the Fire Department or Health Department will be notified as well.
- 2. Immediate action will be taken to contain the hazardous material, provided the workers involved are properly attired with adequate protective clothing to avoid exposure.
- 3. Proper containment procedures will be determined for the hazardous material encountered prior to cleanup commencing. All personnel involved in the containment effort will be properly protected to prevent exposure. Backup personnel will be similarly protected while monitoring the work being done for any additional dangers.
- 4. The container(s) will be staged on site, away from the major activity areas and in such a way that if loss of containment occurs, the material will be withheld from further spread by a secondary containment berm or vessel.
- 5. The owner or agent controller of the property will be notified promptly of the incident and will be apprised as to the options available for proper disposal.

ACUTE EXPOSURE SYMPTOMS AND FIRST AID

EXPOSURE ROUTE	<u>SYMPTOMS</u>	FIRST AID
Skin	Dermatitis, itching redness, swelling	Wash immediately with soap and water contact ambulance if evacuation is needed.
Eyes	Irritation, watering	Flush with water, transport directly to emergency room, if necessary.
Inhalation	Vertigo, tremors stupor, dizziness	Move person to fresh air, cover source of exposure.
Ingestion	Nausea, vomiting	Call Poison Control Center, DO NOT INDUCE VOMITING, transport to medical facility.
Local Resources:		

Local Resources:

HEALTH AND SAFETY CONTACT FOR ASE:

Michael D. Dirk

Office: (415) 820-9391

Ambulance
Police
Fire: 911

POISON CONTROL: SF (415) 476-6600

Emergency Route to nearest Medical Facility:

Exit site, Travel WEST on 65th Street LEFT on San Pablo Avenue RIGHT on Ashby Avenue (Hwy. 13) RIGHT on Colby Plaza

HOSPITAL IS NEAR THE CORNER OF ASHBY AY COLBY PLAZA

Hospital: ALTA BATES HOSPITAL

3001 COLBY PLAZA, BERKELEY 540-0337 ext 6

HEALTH & SAFETY PLAN

for the

OLIVER RUBBER JOBSITE

1200 65th STREET EMERYVILLE, CA

prepared by

Aqua Science Engineers, Inc. 1041 Shary Circle Concord, CA 94518 1 (800) 678-9391

AQUA SCIENCE ENGINEERS, INC. HEALTH & SAFETY PLAN for the OLIVER RUBBER JOBSITE

A. GENERAL DESCRIPTION

Site: 1200 65TH STREET, EMERYVILLE CALIFORNIA

Work Scope: 1. PR

- 1. PROVIDE INSTALLATION OF SHORING AT SITE FOR SAFE REMOVAL OF UST.
- 2. PROVIDE EXCAVATION SERVICES FOR TANK REMOVAL.
- 3. PROVIDE CRANE LIFTING OPERATIONS TO EXTRICATE TWO 8,000 GALLON UNDERGROUND STORAGE TANKS.
- 4. REMOVE THE SHORING UPON SUCCESSFUL COMPLETION / OF TANK REMOVAL AND BACKFILLING OPERATIONS.
- RESURFACE EXCAVATION AREA AND RESTORE TO / PREVIOUS USABLE CONDITION.

NOTE: ONE TANK PREVIOUSLY CONTAINED GASOLINE, THE OTHER A PETROLEUM SOLVENT EQUIVALENT TO PETROLEUM NAPHTHA, WHICH IS KNOWN TO BE EXTREMELY FLAMMABLE.

SAFETY POLICY:

This Health and Safety Plan is written specifically for the Oliver Rubber jobsite, located at 1200 65th Street, Emeryville California. This plan does <u>not</u> include specific procedures for tank removal or soil offhaul, but addresses hazards associated with these and related activities. All persons on site will follow OSHA safe operating practices as outlined in 29 CFR 1910 and 1926, as well as established guidelines from their respective companies or organizations.

Plan Prepared by: Michael D. Dirk Date: 10/9/91

Plan Approved by: David Prull Date: 10/10/91

Proposed Start Date: OCTOBER 21, 1991 √

Overall Hazard Level: Serious: Low:

Moderate: XX Unknown:

Project Organization:

Site Manager for A.S.E.: David Prull A.S.E. Safety Officer: Michael Dirk

Other A.S.E Personnel: Steve DeHope, Craig Hertz

B. SITE/WASTE CHARACTERISTICS

Waste Type(s): Solid: XX Sludge:

Liquid: XX Gas:

Characteristics: GASOLINE, SOLVENT RESIDUALS, FLAMMABLE, TOXIC

Site Parameter: THE EXCAVATION PIT AS WELL AS ANY STOCKPILED

MATERIAL ARE IDENTIFIED AS EXCLUSION ZONES. A MINIMUM BOUNDARY OF THREE FEET SURROUNDING BOTH IS TO BE MAINTAINED IN AS MUCH AS IS

POSSIBLE. <u>AT NO TIME SHALL ANY PERSONNEL ENTER</u>
THE EXCAVATION WITHOUT A SAFETY WATCH PERSON

STANDING BY OBSERVING THE ENTRY PERSON'S

ACTIVITY.

C. HAZARD EVALUATION

CHEMICAL HAZARDS

Potential chemical hazards include skin and eye contact or inhalation exposure to potentially toxic concentrations of hydrocarbon vapors. The potential toxic compounds that may exist at the site are listed below, with descriptions of specific health effects of each. The list includes the primary potential toxic constituents that may be found in gasoline, and the ingredients that are found in the petroleum solvent residue of the second tank. (excerpted from NIOSH Pocket Guide to Chemical Hazards, June 1990).

GASOLINE TANK

1. BENZENE

- a. Colorless, clear, highly flammable liquid (class 1B) with characteristic odor.
- b. High exposure levels may cause acute restlessness, convulsions, depression, respiratory failure. BENZENE IS A SUSPECTED CARCINOGEN.
- c. Permissible exposure level (PEL) for a time weighted average (TWA) over an eight hour period is 1.0 ppm.

2. TOLUENE

- a. Colorless, flammable liquid (class 1B) with a sweet benzene-like odor.
- b. High exposure levels may cause fatigue, euphoria, confusion, dizziness. TOLUENE IS LESS TOXIC THEN BENZENE.
- c. PEL for a ten hour TWA is 100 ppm.

3. XYLENE

 Y_{i}

- a. Colorless, flammable liquid (class 1B or 1C depending on isomers) with aromatic odors.
- b. high exposure levels may case dizziness, drowsiness, narcosis.
- c. PEL for a ten hour TWA is 100 ppm.

4. ETHYLBENZENE

- a. Clear, colorless, highly flammable liquid (class 1B) with characteristic odor.
- b. High exposure levels may cause irritation to skin, nose and throat, constriction in chest, loss of consciousness, respiratory failure.
- c. PEL for an eight hour TWA is 100 ppm.

5. LEAD

(as Pb)

- a. Odorless, colorless solid with properties that vary depending upon specific compounds. Non-combustible in solid form.
- b. High exposure levels may cause nausea, diarrhea, inflamed mucous membranes, abdominal pains, weakness. LEAD IS A SUSPECTED CARCINOGEN.
- c. PEL for an eight hour TWA is .1 milligrams per cubic meter (airborne).

SOLVENT TANK

1. CYCLOHEXANE

- a. Colorless, flammable liquid (class 1A) with a sweet chloroform-like odor.
- b. High exposure levels may cause irritation to the eyes and respiratory system, drowsiness, numbness, unconsciousness.
- c. PEL for a ten hour TWA is 300 ppm, or 1050 milligrams per cubic meter (airborne).

2. n-HEPTANE

- a. Colorless, flammable liquid (class 1B) with gasoline-like odor.
- b. High exposure levels may cause light headedness, stupor, nausea, chemical pneumonia, unconsciousness.
- c. PEL for a ten hour TWA is 85 ppm, or 350 milligrams per cubic meter (airborne).

METHYLCYCLOHEXANE

- a. Colorless, flammable liquid (class 1B) with a faint benzene-like odor.
- b. High exposure levels may cause light headedness, drowsiness, nose and throat irritation.
- c. PEL for a ten hour TWA is 400 ppm, or 1600 milligrams per cubic meter (airborne).

- 4. n-HEXANE
- a. Colorless, flammable liquid (class 1B) with a gasoline-like odor.
- b. High exposure levels may cause light headedness, nausea, numb extremities, muscular weakness, eyes and nose irritation.
- c. PEL for a ten hour TWA is 50 ppm, or 180 milligrams per cubic meter (airborne).

5. TOLUENE

- a. Colorless, flammable liquid (class 1B) with a sweet benzene-like odor.
- b. High exposure levels may cause fatigue, euphoria, confusion, dizziness. TOLUENE IS LESS TOXIC THEN BENZENE.
- c. PEL for a ten hour TWA is 100 ppm.

6. PARAFFINS & CYCLOPARAFFINS

NIOSH has published no exposure guidelines for paraffins or cycloparaffins.

ALL SUBSTANCES AS THEY EXIST ON SITE ARE EXPECTED TO BE STABLE.

Site Status: ACTIVE: XX INACTIVE:

Site History: THE SITE IS CURRENTLY A RUBBER PRODUCT

MANUFACTURING PLANT.

PHYSICAL HAZARDS

Under no circumstances will anyone enter the excavation pit without a safety watch person standing by observing the entry person's activity. No person will climb on any excavated material piles without a safety person observing that activity. Personnel shall otherwise maintain the maximum distance possible from the pit while performing their activities. On-site hazards include physical injuries due to the proximity of workers to engine-driven heavy equipment and tools. Equipment used during excavation may include a backhoe or other excavator, a crane for lifting the tanks and a mechanical tamper or other equipment as part of the subsequent backfilling operations. Only trained personnel will operate machines, tools and equipment; all equipment will be kept clean and in good repair. MANDATORY SAFETY CLOTHING REQUIRED AROUND HEAVY EQUIPMENT WILL INCLUDE A HARDHAT AND STEEL-TOED BOOTS AT A MINIMUM.

ALL WORK WILL BE PERFORMED IN ACCORDANCE WITH OSHA GUIDELINES.

Daily inspections of the excavation, the adjacent areas, and protective systems are to be made by a qualified person while personnel are on site. Attention will be made to note if any evidence of potential cave-in exists.

HAVE AT LEAST ONE DRY CHEMICAL MODEL PA-200 A/B-C FIRE EXTINGUISHER PRESENT.

LEVEL OF PROTECTION

A contamination Reduction Zone (CRZ) will be maintained and adjusted as work proceeds and moves around the site. The workers on site will wear level 'D' protective clothing. (This protection level may be upgraded after on-site conclusions of data are completed). THE LEVEL OF PROTECTION FOR PERSONNEL WORKING IN THE AREA WILL BE UPGRADED IF; the organic vapor levels in the equipment operator's breathing zone exceeds 5 ppm above background levels continuously for more then five minutes. In this event, personnel protective equipment will include full face respirators with double-cartridge filters for organic vapors and particulates, in addition to hardhat, steel-toed boots and coveralls. Excavation will cease, equipment shutdown, and personnel will withdraw from the area if either 1.) the organic concentration in the operator's breathing zone exceeds 200 ppm for 5 minutes or 2.) the organic vapor concentration two feet above the excavation exceeds 2,000 ppm or 25% of the lower explosive limit. If work proceeds in an environment where organic vapor concentrations exceed 200 ppm, a self contained breathing apparatus or airline respirator will be utilized by the personnel.

Levels of Protective Clothing are defined on the following pages as described in the "EPA Standard Operating Safety Guidelines":

LEVEL A PROTECTION

Components:

- 1.) Pressure-demand, supplied air respirator that is MSHA and NIOSH approved. Respirators may be pressure demand, self contained breathing apparatus (SCBA), or pressure demand, airline respirator with an escape bottle for atmospheres with an extreme IDLH.
- 2.) Fully encapsulating chemical resistant suit.
- 3.) Inner, chemical resistant gloves.
- 4.) Disposable gloves and boot covers, worn over the fully encapsulating suit.
- 5.) 2-way radio communications is highly recommended.

LEVEL B PROTECTION

Components:

- 1.) Pressure-demand, supplied air respirator that is MSHA and NIOSH approved. Respirators may be pressure demand, self contained breathing apparatus (SCBA), or pressure demand, airline respirator with an escape bottle for atmospheres with an extreme IDLH.
- 2.) Chemical resistant clothing which includes overalls and long sleeved jacket or, hooded one or two piece chemical splash suit or disposable chemical resistant one piece suit..
- 3.) Outer chemical resistant gloves.
- 4.) Inner chemical resistant gloves.
- 5.) Chemical resistant, steel toed and shank boots.
- 6.) Disposable chemical resistant boot covers.
- 7.) Hardhat.
- 8.) 2-way radio communications is highly recommended.

LEVEL C PROTECTION

Components:

- 1.) Air purifying respirator, full face, with twin cartridge or cannister equipped filters, that are MSHA and NIOSH approved.
- 2.) Chemical resistant clothing which includes coveralls or, hooded one-piece or two-piece chemical splash suit or chemical resistant hood and apron; disposable chemical resistant coveralls.
- 3.) Outer chemical resistant gloves.
- 4.) Inner chemical resistant gloves.
- 5.) Chemical resistant, steel toed and shank boots.
- 6.) Disposable chemical resistant boot covers.
- 7.) Hardhat.
- 8.) 2-way radio communications is recommended.

LEVEL D PROTECTION

Components:

- 1.) Coveralls.
- 2.) Gloves.
- 3.) Leather boots, shoes or chemical resistant, with steel toe and shank.
- 4.) Safety glasses or chemical splash goggles.
- 5.) Hardhat or face shield.

COMBUSTIBLE GAS AND ORGANIC VAPOR MONITORING

Site personnel will monitor ambient levels of combustible gas vapors using a Thermo Environmental Instruments model 580A or a Gastech model GX-88 OVM. Volatile organic vapor levels greater then 5 ppm above background levels in the hot zone are not anticipated. If the OVM measurements do not decrease below 5 ppm, level 'C' protection will be required. The site Project Manager will be notified if organic vapor levels in the air samples exceed ambient concentrations.

A wetting agent or some form of dust control is recommended to reduce the airborne dust level and subsequent particulate hazard. HEPA respirator cartridges are also recommended as needed.

SITE ENTRY PROCEDURES

Any personnel entering the site will observe all conditions set forth by the owner of the property, including vehicle travel speeds, restricted areas and conduct.

Eating, drinking, smoking and other practices which increase the probability of hand-to-mouth transfer of contamination is prohibited in the work zone. All field personnel will be instructed to thoroughly wash their hands and face upon leaving the work area for breaks or cessation of day's activities. A first aid kit and at least one 20 pound A-B-C fire extinguisher will be available at the site.

DECONTAMINATION PROCEDURES

If required, equipment and personnel decontamination areas will be designated by the Project Manager at the start of the project. To prevent the transfer of contamination from the work site into clean areas, all tools will be cleaned adequately prior to final removal from the work zone. Protective clothing such as Tyvek coveralls, latex gloves, boot covers, etc. will be changed on a daily basis or at the discretion of the Project Manager on site. All disposable protective clothing will be put into plastic bags and disposed of in a proper manner. All respirator cartridges will be discarded and replaced with fresh units on a daily basis, disposal will be in the same manner as the protective clothing. Excavated soils will be stockpiled in an area designated by the Project Manager, until chemical analysis has been performed on representative samples.

In the event of a medical emergency, the injured party will be taken through decontamination procedures, if possible. However, the procedures may be omitted when it may aggravate or cause further harm to the injured party. Member of the work team will accompany the injured party to the medical facility to advise on matters concerning chemical exposure.

Personnel Protection Level will be Level 'D'. Protective clothing levels may be upgraded in the event that on site conclusions determine a greater then anticipated danger to personnel.

SPECIAL CONDITIONS

Site Entry: NORMAL, NO SPECIAL CONDITIONS

Decontamination-

Personnel and Equipment: IF REQUIRED, PERSONNEL AND EQUIPMENT

WILL BE DECONTAMINATED A PER USEPA

STANDARD OPERATING SAFETY

GUIDELINES. A SMALLER MODIFIED DECONTAMINATION LINE MAY BE USED DUE

TO SPACE RESTRICTIONS.

NONE ARE ANTICIPATED, HOWEVER, PERSONNEL WORKING ON SITE MAY EXPERIENCE ELEVATED TEMPERATURES DURING THE WORK DAY. IN THE EVENT THAT AMBIENT TEMPERATURES REACH OR EXCEED 80 DEGREES FAHRENHEIT, THE FOLLOWING GUIDELINES ARE RECOMMENDED.

- 1. Periods of work should be reduced to no less then one hour time frames and separated by breaks intended to reduce personnel stress due to reduced natural ventilation from wearing protective clothing.
- 2. All personnel wearing level C protective clothing or greater, will be subject to medical monitoring of body temperature after work periods, by the following guidelines;
- a. Heart Rate (HR) should be measured by counting the radial pulse rate for 30 seconds and doubling count for the correct pulse rate. This should be done as early as possible in the resting period. The HR at the beginning of the rest period should not exceed 110 beats per minute. If the HR is higher, the next work period should be shortened by 10 minutes, while the length of the rest period remains the same. If the HR is 100 beats per minute at the beginning of the next rest period, the following work period should be shortened by an additional 10 minutes.
- b. Body temperatures should be measured orally with a clinical thermometer as soon as possible in each resting period. Oral Temperatures (OT) should not exceed 99 degrees Fahrenheit. If it does, the next work period should be reduced by 10 minutes while the length of the resting period remains the same. If the OT exceeds 99 degrees Fahrenheit at the beginning of the next work period, the following work period should be reduced by an additional 10 minutes. OT should be measured at the end of each rest period to ensure that the body's temperature has dropped below 99 degrees Fahrenheit.

Body Water Loss (BWL) from sweating, could result in dehydration and further complications and stress on personnel working in protective clothing under adverse weather conditions. It is strongly recommended that plenty of stress relief beverages be available on site to replace body fluids. Commercial drink mixes that provide electrolyte balancing solutions or water are adequate for replacing body fluids.

Alternate methods of heat stress reduction can be made available such as,

Portable showers or hose-down facilities, Shelter cover to protect against direct sunlight, Rotating teams of personnel wearing protective clothing, Performing extremely arduous tasks early in the workday.

EMERGENCY INFORMATION

In the event of an injury or suspected chemical exposure, the first responsibility of the Project Manager will be to prevent any further injury. This objective will normally require an immediate stop to work until the situation is remedied. The Project Manager may order the evacuation of the work party. Other primary responsibilities in the event of an accident will be the first aid and decontamination of the injured team member(s). The injured party will be moved to a designated safe area and initial first aid will be rendered.

Employees are asked to make every effort and take personnel responsibility to prevent accidents involving machinery or any other aspect of the job, either by individual action or by notifying the Project Manager immediately of any unsafe condition that may exist.

In the event of an unexpected hazardous material discovery on site, the following actions will be taken by any employee involved;

- 1. The person having uncovered the unexpected material will notify the Project Manager and other workers of the danger. The site will be cleared of personnel if deemed necessary by the Project Manager. If site evacuation is required, appropriate local agencies such as the Fire Department or Health Department will be notified as well.
- 2. Immediate action will be taken to contain the hazardous material, provided the workers involved are properly attired with adequate protective clothing to avoid exposure.
- 3. Proper containment procedures will be determined for the hazardous material encountered prior to cleanup commencing. All personnel involved in the containment effort will be properly protected to prevent exposure. Backup personnel will be similarly protected while monitoring the work being done for any additional dangers.
- 4. The container(s) will be staged on site, away from the major activity areas and in such a way that if loss of containment occurs, the material will be withheld from further spread by a secondary containment berm or vessel.
- 5. The owner or agent controller of the property will be notified promptly of the incident and will be apprised as to the options available for proper disposal.

ACUTE EXPOSURE SYMPTOMS AND FIRST AID

EXPOSURE ROUTE	SYMPTOMS	FIRST AID
Skin	Dermatitis, itching redness, swelling	Wash immediately with soap and water contact ambulance if evacuation is needed.
Eyes	Irritation, watering	Flush with water, transport directly to emergency room, if necessary.
Inhalation	Vertigo, tremors stupor, dizziness	Move person to fresh air, cover source of exposure.
Ingestion	Nausea, vomiting	Call Poison Control Center, DO NOT INDUCE VOMITING, transport to medical facility.

Local Resources:

HEALTH AND SAFETY CONTACT FOR ASE:

Ambulance

Michael D. Dirk

Office: (415) 820-9391

POISON CONTROL: SF (415) 476-6600

Emergency Route to nearest Medical Facility:

Exit site. Travel WEST on 65th Street LEFT on San Pablo Avenue RIGHT on Ashby Avenue (Hwy. 13) RIGHT on Colby Plaza

HOSPITAL IS NEAR THE CORNER OF ASHBY AY COLBY PLAZA

ALTA BATES HOSPITAL Hospital: -3001 COLBY PLAZA, BERKELEY 540-0337

ACUTE EXPOSURE SYMPTOMS AND FIRST AID

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Local Resources:

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Michael D. Dirk

Office: (415) 820-9391

Ambulance *Police* : 911 Fire

POISON CONTROL: SF (415) 476-6600

Emergency Route to nearest Medical Facility:

Exit site, Travel WEST on 65th Street

LEFT on San Pablo Avenue

RIGHT on Ashby Avenue (Hwy. 13)

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The depositor will use this form to acknowledge that the property owner or his or her designee will receive any refund due at the completion of all deposit/refund projects at the site listed below.

	REFUND RECIPIENT-PROPERTY OWNE
Site Number	
Oliver Rubber Co	Anua Science Engineers
Company Name	Owner's Name
1200 65th St.	1041 Shary Circle
Street Address	Owner's Address
Oakland Ca 94662	Concord Le 94518
City Zip Code	Owner's City State Zip
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ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION Declaration of Site Account Refund Recipient SITE OWNER FILLS OUT PER SITE -- OPTIONAL --

The property owner will use this form to designate someone other than him-wor her- self to receive any refund due at the completion of all deposit/refund projects at the site listed below. In the absence of this form, the property owner will receive any refund. Only one person at any one time may be designated to receive any refund.

Company Name Company Name Owner's Name Street Address Owner's Address City Zip Code Owner's City State I designate the following person to receive any refund due at the completion of all deposit/refund projects: Name Street Address City / Zip		PROPERTY	OWNER	-
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RETURN FORM TO: Alameda County, Hazardous Materials Div.

80 Swan Way, Rm 200 Oakland, CA 94621-1439 Phone: (510) 271-4320



QUESTIONS? CALL 800-238-5355 TOLL FREE.

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ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

_			
	11. MANK	Hazardous Mate	erials Division Inspection Form
	Site ID#	Site Name	iver Kubber Plant Today's Date 1/14,9
	Site Address	200 GTh	Strut EPA ID#
	city <u>Goven</u>	y ville	Zip 94608 Phone
	1AX Amt. Stored > 5001b lazardous Waste generat		Inspection Categories: I. Haz. Mat/Waste GENERATOR/TRANSPORTER II. Business Plans, Acute Hazardous Materials III. Underground Tanks
Tr	ne marked items represe	ent violations of the Call	f, Administration Code (CAC) or the Health & Safety Code (HS&C)
I.A	GENERATOR (Title 22) 1. Waste ID 2. EPA ID 3. > 90 days 4. Label dates 5. Blennial	* 66471 66472 66508 66508 66493	ts-erraged & cleaned before
Monifest	6. Records 7. Correct 8. Copy sent 9. Exception 10. Copies Rec'd	66492 66484 66492 66484 66492	macificary,
Misc.	11. Treatment 12. On-site Disp. (H.S.&C.) 13. Ex Haz. Waste	66371 26189.5 66570	
Prevention	14. Communications 15. Alsle Space 16. Local Authority 17. Maintenance 18. Training	67121 67124 67126 67120 67105	
gency	19. Prepared 20. Name List 21. Copies 22. Emg. Coord. Ting.	67140 67141 67141 67144	
Containers, Tanks	23. Condition 24. Compatibility 25. Maintenance 26. Inspection 27. Buffer Zane 28. Tank inspection 29. Containment 30. Safe Storage 31. Freeboard	67241 67242 67243 67244 67246 67259 67255 67261 67257	
.B 1	RANSPORTER (Title 22) 32. Applic./Insurance 33. Comp. Cert./CHP Insp 34. Containers	66428 66448 66465	
Manifest	35. Vehicles 36. EPA ID ★s 37. Correct 38. HW Delivery 39. Records	66465 66531 66541 66543 66544	
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Contact:

Signature:

Title:

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

	pink -mes		zardous Materials Inspection Form 30AU—K:30
11.4	BUSINESS PLANS (Title 19) 1. immediate Reporting 2. 8us Plan Stas. 3. RR Cars > 30 days 4. inventory information 5. inventory Complete 6. Emergency Response 7. Training 8. Deficiency 9. Modification	2703 25503(b) 25503.7 25504(a) 2730 25504(b) 25504(c) 25505(a) 25505(b)	Site Site Name OLIVER RUBBER Today's 591 Site Address / 200 GSH Street City Enruyi/) C zip 94 GOS Phone MAX AMT stored > 500 lbs, 55 gal., 200 cft.? Inspection Categories:
П.В	ACUTELY HAZ. MAT'LS 10. Registration Form Filed 11. Form Complete 12. RM/PP Contents 13. Implement Sch. Reg'd? (Y/N) 14. OffSite Carseq. Assess. 15. Probable Risk Assessment 16. Persons Responsible	25524(c) 25534(d) 25534(g)	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)
			Samplings 1200 65th Street Blog.
General	2. Pipeline Leok Defection 3. Records Maintenance 4. Release Report 5. Closure Plans	25284 (H&S) 25292 (H&S) 2712 2651 2670	9,5 ft 1/Anut 1
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		2643 2644 2646 2647	
New Tanks	11.Monitor Plan 12.Access. Secure 13.Plans Submit Date: 14. As Built Date:	2632 2634 2711 2635	
Rev	6/68		[

Inspector:

Signature:

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ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200 Oakland, CA 94621

(415) 271-4320

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	14. OffSite Conseq. Assess. 15. Probable Risk Assessment 16. Persons Responsible	25524(c) 25534(d) 25534(g)	Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)
	17. Certification 18. Exemption Request? (Y/N) 19. Trade Secret Requested?	25534(f) 25536(b) 25538	comments: gal tak This of Sidewal
m.	UNDERGROUND TANKS (TITLE	e 23)	LEL -02/10 D2-2%
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SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN HOTICS TO THE DERTIFICATE HULLER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO BUIGATION OR MARKETUITM OF ANY KIND UPON THE COMPANY. ITS AGENTS OR REPRESENTATIVES.

UTHERIZED REPRESENTATIVE

Janiel Carpa

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY DEPARTMENT OF ENVIRONMENTAL HEALTH HAZARDOUS MATERIALS DIVISION 80 SWAN WAY, ROOM 200

OAKLAND, CA 94621 PHONE NO. 415/271-4320

ACCEPTED

DEPARTMENT OF ENVIRONMENTAL HEALTH 470 - 21th Street, Third Floor Telcphone: (415) 874-7237 Oakland, CA 94612

These plans have been reviewed and found to be accontable and essentially meet the requirements of State and local health laws. Changes to your plans indicated by this Department are to assure compliance with State and least laws. The project proposed herein is now released for issuance of any required building permits for construction

One copy of these accepted plans must be on the job and available to all contractors and craftsman involved with the removal.

must be submitted to this Dopa tment and to the Fire and Notify this Dopartment at least 48 hours prior to the Any change or alterations of these plans and specifications changes meet the requirements of State and local laws. Building Inspiration Depirtment to determine following required inspections:

Removal of Tank and Piping Final Inspection Sampling

pliance with accepted plans and all applicable laws and Issuance of a permit to operate is dependent on com-THERE IS A FINANCIAL PENALTY FOR NOT regulations.

OBTAINING THESE INSPECTIONS.

UNDERGROUND TANK CLOSURE PLAN Complete according to attached instructions

1.	Business Name OLIVER RUBBER Co.
	Business Owner STANDARD PRODUCTS CO.
2.	Site Address 1200 65 Th 5T.
	City EMMER YVILLE, CA. zip 94608 Phone (510) 654-7711
3.	Mailing Address P.O. Box 8447
	City <u>OAKLAND</u> , <u>CA</u> zip <u>5466</u> Z Phone <u>(510)654-7711</u>
4.	Land Owner OLIVER RUBBER
	Address 1200 65th ST. city, State EMMERYVILLE, (A zip \$4608
5.	Generator name under which tank will be manifested
	OLIVER RUBBER CO.
	EPA I.D. No. under which tank will be manifested <u>CAC 000 644 4</u> 16
	- 1 - 10/8/51 GOOD FOR 90 DAYS

6.	contractor AQUA SCIENCE ENGINEERS
	Address 1041 SHARY CIRCLE
	city <u>CONCORD</u> , <u>CA.</u> Phone <u>(510)</u> 685-6700
	License Type ENG. A ID# 60806Z
7.	Consultant AQUA SCIENCE ENGINEERS
	Address 1041 SHARY CIRCLE
	city <u>CONCORD</u> , <u>CA</u> Phone <u>(510)685-6700</u>
8.	Contact Person for Investigation
	Name DAVID C. PRULL TITLE PROJECT MANAGER
	Phone (510) 685-6700
_	Number of tanks being closed under this plan
9.	Length of piping being removed under this plan
	and the state of t
	Total number of tanks at facility 3
10.	State Registered Hazardous Waste Transporters/Facilities (see instructions).
	** Underground tanks are hazardous waste and must be handled ** as hazardous waste
	a) Product/Residual Sludge/Rinsate Transporter
	Name WASTE OIL RECOVERY EPA I.D. No. CAD 000626515
	Hauler License No. cal. Puct 106399 License Exp. Date $\frac{4/97}{2}$
	Address 640/ LEONA STREET
	city OAKIAND state CA zip 34605
	b) Product/Residual Sludge/Rinsate Disposal Site
	Name DEMENNO KERDOON EPA I.D. No. <u>CATO80013</u> 350
	Address ZOOO N. ALAMEDA
	city Compton state CA zip 90221

c) Tank and Piping Transporter
Name <u>ERICKSON</u> , INC. EPA I.D. No. <u>CAD 009466392</u>
Hauler License No. 0019 License Exp. Date 5-92
Address 255 PARR BOULEVARD
Address 255 PARR BOULEVARD City RICHMOND State CA Zip 94801
d) Tank and Piping Disposal Site
Name <u>ERICKSON</u> , INC. EPA I.D. No. <u>CADOO 9466392</u>
Address 255 PARR BOULEVARD
Address <u>Z55 PARR BOULEVARD</u> City <u>RICHMOND</u> State <u>CA</u> Zip <u>94801</u>
11. Experienced Sample Collector
Name DAVID C. PRULL
Company AQUA SCIENCE ENGINEERS
Address 1041 SHARY CIRCLE
city <u>Concord</u> state <u>CA</u> zip <u>94518</u> Phone <u>(510)685</u> -6700
12. Laboratory
Name CHROMALAB, INC.
Address 2239 OMEGA RD. #1
city 5AN RAMON State (A. Zip 94583
State Certification No E-654
13. Have tanks or pipes leaked in the past? Yes [/] No []
If yes, describe. Soil BORINGS CONDUCTED BY ENVIRONMENTAL
ENGINEERS 'SAN TOSE, CA (3/88) INDICATE HYDROCARBONS
CONSISTENT W/ TANK PRODUCTS FOUND IN SOIL AND WATER

14.	Describe	methods	to	be	used	for	rendering	tank	inert
				~	4		T CHACT THE	COLLE	TIMET

DRY	ICE	AT	A RAT	EOF	1.5	POUNDS	PER	
						(min)		
 	0							

*9

Before tanks are pumped out and inerted, all associated piping must be flushed out into the tanks. All accessible associated piping must then be removed. Inaccessible piping must be plugged.

The Bay Area Air Quality Management District (771-6000), along with local Fire and Building Departments, must also be contacted for tank removal permits. Fire departments typically require the use of explosion proof combustible gas meters to verify tank inertness. It is the contractor's responsibility to bring a working combustible gas meter on site to verify tank inertness.

15. Tank History and Sampling Information

Та	nk	Material to	*	
Capacity	Use History (see instructions)	be sampled (tank contents, soil, ground- water, etc.)	Location and Depth of Samples	
	INSTAURTION CIRCA 1985 LAST USET) CIRCA 1985 MATERIALS STORED: CASOLINE AND VOLATLE SOLVENTS (MITTURES OF PARAFINS, NATTHENES, TOUVENE, CYCLOHERANE)	INTERFACE	SOIL/GW WERFACE IN SIDEMAL APPROX. 11.0 FT. BELOW GRADE	

offa

One soil sample must be collected for every 20 feet of piping that is removed. A ground water sample must be collected should any ground water be present in the excavation.

Excavated/Stockpiled Soil				
Stockpiled Soil Volume (Estimated) 250 Cuy L.	Sampling Plan I SAMPLE FROM EACH 50 GARDS OF MATERIAL EXCAUATED. EACH SAMPLE WILL BE MADE UP OF FOUR SUBSAMPLES EACH SAMPLE WILL BE ANALYZED FOR; THE G (5030/8015) AND VOLATILE OPERAVICS (8240)			

Stockpiled soil must be placed on bermed plastic and must be completely covered by plastic sheeting.

16. Chemical methods and associated detection limits to be used for analyzing samples

The Tri-Regional Board recommended minimum verification analyses and practical quantitation reporting limits should be followed. See attached Table 2.

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit
JoTal Lead GASOLINE TO BENZENE TOLVENE	l AA 46 GCFB030	- 8015	1 ppm(sore)
ETHIL BENZENE XTLENES NAPTHENES CYCLOHERANES N- HEPTANE N- HERANE	2020 n 8290	. 8740	5 fpb(sor 1= 100 ppb (sove)
METHYCYCLO HEXANE	GCFID(3550)	3570	1.0 jpm (sa

17. Submit Site Health and Safety Plan (See Instructions)

18. Submit Worker's Compensation Certificate copy

Name of Insurer __OHIO CASUALTY GROUP

- 19. Submit Plot Plan (See Instructions)
- 20. Enclose Deposit (See Instructions)
- 21. Report any leaks or contamination to this office within 5 days of discovery. The report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report form. (see Instructions)
- 22. Submit a closure report to this office within 60 days of the tank removal. This report must contain all the information listed in item 22 of the instructions.

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 understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel health and safety. 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.

Once I have received my stamped, accepted closure plan, I will contact the project Hazardous Materials Specialist at least three working days in advance of site work to schedule the required inspections.

Signature of Contractor
Name (please type) DAVID C. PRULL
Signature and C. Paull
Date
Signature of Site Owner or Operator
Name (please type) R.E. FARR
Signature <u>R.S.</u>
Date

TABLE \$2 RECOMMENDED MINIMUM VERIFICATION ANALYSES FOR UNDERGROUND TANK LEAKS

	<u> </u>	
HYDROCARBON LEAK	SOIL ANALYSIS	WATER ANALYSIS
Unknown Fuel	TPH G GCFID(5030) TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH D GCFID(3510)
Leaded Gas	TPH G GCFID(5030) BTX&E 8020 OR 8240 TPH AND BTX&E 8260 TOTAL LEAD AA	BTX&E 602 or 624
	TEL DHS-LUFT EDB DHS-AB1803	
Unleaded Gas	TPH G GCFID(5030) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH G GCFID(5030) BTX&E 602, 624 or 8260
Diesel, Jet Fuel and Kerosene	TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH D GCFID(3510) BTX&E 602, 624 or 8260
Fuel/Heating Oil	TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH D GCFID(3510) BTX&E 602, 624 or 8260
Chlorinated Solvents	CL HC 8010 or 8240 BTX&E 8020 or 8240 CL HC AND BTX&E 8260	CL HC 601 or 624 BTX&E 602 or 624 CL HC AND BTX&E 8260
Non-chlorinated Solvents	TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH D GCFID(3510) BTX&E 602 or 624 TPH and BTX&E 8260
Waste and Used Oil or Unknown (All analyses must be completed and submitted)	TPH G GCFID(5030) TPH D GCFID(3550) TPH AND BTX&E 8260 O & G 5520 D & F BTX&E 8020 or 8240	TPH G GCFID(5030) TPH D GCFID(3510 O & G 5520 C & F BTX&E 602, 624 or
	CL HC 8010 or 8240	8260 CL HC 601 or 624
	ICAP or AA TO DETECT MET METHOD 8270 FOR SOIL OR PCB* PCP* PNA CREOSOTE	

^{*} If found, analyze for dibenzofurans (PCBs) or dioxins (PCP)

Reference: Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, 10 August 1990

EXPLANATION FOR TABLE #2: MINIMUM VERIFICATION ANALYSIS

- 1. OTHER METHODOLOGIES are continually being developed and as methods are accepted by EPA or DHS, they also can be used.
- 2. For DRINKING WATER SOURCES, EPA recommends that the 500 series for volatile organics be used in preference to the 600 series because the detection limits are lower and the QA/QC is better.
- 3. APPROPRIATE STANDARDS for the materials stored in the tank are to be used for all analyses on Table #2. For instance, seasonally, there may be five different jet fuel mixtures to be considered.
- 4. To AVOID FALSE POSITIVE detection of benzene, benzene-free solvents are to be used.
- 5. TOTAL PETROLEUM HYDROCARBONS (TPH) as gasoline (G) and diesel (D) ranges (volatile and extractible, respectively) are to be analyzed and characterized by GCFID with a fused capillary column and prepared by EPA method 5030 (purge and trap) for volatile hydrocarbons, or extracted by sonication using 3550 methodology for extractable hydrocarbons. Fused capillary columns are preferred to packed columns; a packed column may be used as a "first cut" with "dirty" samples or once the hydrocarbons have been characterized and proper QA/QC is followed.
- 6. TETRAETHYL LEAD (TEL) analysis may be required if total lead is detected unless the determination is made that the total lead concentration is geogenic (naturally occurring).
- 7. CHLORINATED HYDROCARBONS (CL HC) AND BENZENE, TOLUENE, XYLENE AND ETHYLBENZENE (BTX&E) are analyzed in soil by EPA methods 8010 and 8020 respectively, (or 8240) and in water, 601 and 602, respectively (or 624).
- 8. OIL AND GREASE (O & G) may be used when heavy, straight chain hydrocarbons may be present. Infrared analysis by method 418.1 may also be acceptable for O & G if proper standards are used. Standard Methods" 17th Edition, 1989, has changed the 503 series to 5520.
- 9. PRACTICAL QUANTITATION REPORTING LIMITS are influenced by matrix problems and laboratory QA/QC procedures. Following are the Practical Quantitation Reporting Limits:

	SOIL PPM	WATER PPB
TPH G	1.0	50.0
TPH D	1.0	50.0
BTX&B	0.005	0.5
0 & G	50.0	5.000.0

Based upon a Regional Board survey of Department of Health Services Certified Laboratories, the Practical Quantitation Reporting Limits are attainable by a majority of laboratories with the exception of diesel fuel in soils. The Diesel Practical Quantitation Reporting Limits, shown by the survey, are:

ROUTINE	MODIFIED PROTOCOL
<pre>≤ 10 ppm (42%) ≤ 5 ppm (19%) ≤ 1 ppm (35%)</pre>	<pre>≤ 10 ppm (10%) ≤ 5 ppm (21%) ≤ 1 ppm (60%)</pre>

When the Practical Quantitation Reporting Limits are not achievable, an explanation of the problem is to be submitted on the laboratory data sheets.

- 10. LABORATORY DATA SHEETS are to be signed and submitted and include the laboratory's assessment of the condition of the samples on receipt including temperature, suitable container type, air bubbles present/absent in VOA bottles, proper preservation, etc. The sheets are to include the dates sampled, submitted, prepared for analysis, and analyzed.
- 11. IF PEAKS ARE FOUND, when running samples, that do not conform to the standard, laboratories are to report the peaks, including any unknown complex mixtures that elute at times varying from the standards. Recognizing that these mixtures may be contrary to the standard, they may not be readily identified; however, they are to be reported. At the discretion of the LIA or Regional Board the following information is to be contained in the laboratory report:

The relative retention time for the unknown peak(s) relative to the reference peak in the standard, copies of the chromatogram(s), the type of column used, initial temperature, temperature program is C/minute, and the final temperature.

12. REPORTING LIMITS FOR TPH are: gasoline standard ≤ 20 carbon atoms, diesel and jet fuel (kerosene) standard ≤ 50 carbon atoms. It is not necessary to continue the chromatography beyond the limit, standard, or EPA/DHS method protocol (whichever time is greater).

EPILOGUE

ADDITIVES: Major oil companies are being encouraged or required by the federal government to reformulate gasoline as cleaner burning fuels to reduce air emissions. MTBE (Methyl-tertiary butyl ether), ETHANOL (ethyl alcohol), and other chemicals may be added to reformulate gasolines to increase the oxygen content in the fuel and thereby decrease undesirable emissions (about four percent with MTBE). MTBE and ethanol are, for practical purposes, soluble in water. The removal

from the water column will be difficult. Other compounds are being added by the oil companies for various purposes. The refinements for detection and analysis for all of these additives are still being worked out. If you have any questions about the methodology, please call your Regional Board representative.

