# AGENCY

DAVID J. KEARS, Agency Director



RO# 2835

Alameda County CC4580 Environmental Health Services 1131 Harbor Bay Pkwy., #250 Alameda CA 94502-6577 (510)567-6700 FAX(510)337-9335

May 8, 1996

Ms. Tamara Royer Yuasa Exide, Inc. 645 Penn Street Reading, PA 19601

STID 5441

Re:

Response to Yuasa Exide's (Yuasa) May 7, 1996 letter proposal for 29450 Union City Blvd., Union City, California

Dear Ms. Royer,

The following are responses and additional comments to your May 7, 1996 letter proposal for additional work at the above site:

Response to proposal #2: Yuasa needs to add that all documentation of analysis and disposal shall be submitted to Alameda County and Union City.

Response to proposal #3: Two to three wipe samples, depending on what the regulators at the time of sampling observe, should be collected from the concrete seams.

Response to proposal #5: Per our conversation on May 7, 1996, a portion of the carpet in the office area has been removed where a spill had been noted. Per our conversation, one wipe sample shall be collected from the unveiled floor in this area to represent any potential for contamination to have seeped into the floor beneath the carpet. Additionally one to two wipe samples, depending on what is observed by the regulators on the day of sampling, will be collected from the carpet after it has been steamed cleaned for a second time.

Response to proposal #6: Per our conversation, all the electrical conduits were hand-cleaned after identifying the 4,110 ug/ft². This office is requesting that Yuasa document this along with the dates of the initial wipe samples and cleaning. Additionally, Yuasa states that the electrical conduits were re-cleaned on January 24, 1996, which implies that there were two sets of cleaning. Did both these cleaning events employ hand-cleaning methods?

#### Additional comments:

o This office would like more information on the air conditioning system at the site and whether the system intake is located in the building or whether the system outlet is located within the shop/wherehouse area. This information is needed to

determine whether any inspections or wipe samples will be necessary for this system.

Please submit an addendum to the May 7, 1996 letter addressing the above concerns as far in advance of the scheduled May 20, 1996 work as possible.

Lastly, per the County's March 6, 1996 letter, you were requested to submit an additional deposit of \$1,000.00 for oversight costs. The County has not yet received this deposit and this deposit needs to be submitted prior to implementation of any additional work.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely

Juliet Shin

Senior Hazardous Materials Specialist

cc:

Jay G. Swardenski

Union City

34009 Alvarado-Niles Road Union City, CA 94587-4497

Cliff Young Union City 34009 Alvarado-Niles Road Union City, CA 94587-4497

Herman Christensen Herman Christensen and Sons 801 American Street San Carlos, CA 94070

Acting Chief-File

AGENCY

DAVID J. KEARS, Agency Director



RO#2835

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway

Alameda, CA 94502-6577 (510) 567-6777

March 6, 1996

Ms. Tamara Royer Yuasa Exide, Inc. 645 Penn Street Reading, PA 19601

STID 5441

Re: Additional investigation requirements at the Yuasa Exide site, located at 29450 Union City Blvd., Union City, California

Dear Ms. Royer,

This office, in conjunction with Union City, has reviewed the preliminary post-cleanup sample locations for the site and has determined that additional areas need to be sampled in order to fully characterize the site prior to granting closure.

Site reconnaissance was conducted on February 22, 1996 by Union City representatives Cliff Young and Jay Swardenski, Alameda County representative Juliet Shin, Dale Young, Location Manager for Yuasa Exide, and property owner Herman Christensen. During the site reconnaissance, a discrepancy was noted between locations of extensive staining and corrosion and the pre-cleanup and post-cleanup sample locations. Based on our observations of the site, and additional information provided, this office and Union City are requiring the following additional work:

# Additional Sample Collection in the Charging Area

The area on the floor with the most significant observable erosion was noted in the Charging Area, several feet north of post-cleanup wipe sample S166-L-E. The erosion in this area, apparently due to frequent past leaks, has extended through the protective coating and into the concrete. No wipe or core sample was collected from this area during the pre-cleanup nor the post-cleanup sampling. Due to the extent of the erosion, you will be required to collect a concrete core sample from this location. Additionally, an area along the wall/floor boundary, immediately east of post-cleanup wipe sample S166-L-E appears to have formerly absorbed lead acid and is eroded through to the underlying sheet rock. A core sample from the wall in this area will be required.

Ms. Tamara Royer Re: 29450 Union City Blvd. March 6, 1996 Page 2 of 5

### Sample Collection in Area Immediately West of the Battery Wash Area

Extensive staining and corrosion were noted in this area on the floor tiles.

According to Mr. Christensen and Om Chopra, these tiles will be removed by Yuasa Exide in the near future. A minimum of two wipe samples from this area will be required after the tiles have been removed. Additional wipe samples may be warranted based on observations by agency representatives at the time of sampling. You are required to properly assess the tiles to determine whether or not they are hazardous. Documentation for the assessment and disposal shall be submitted to Union City and Alameda County.

## Additional Wipe Samples from Storage Area

o Two to three wipe samples shall be collected from stained areas along the concrete seams. Sample location areas shall be designated by agency representatives at the time of sampling.

## Additional Wipe Sample in Used Battery Storage Area

o Significant staining was noted on the floor in an area approximately five or six feet west of former wipe sample S166-L-C. One wipe sample should be collected from this area.

Extensive erosion was <u>also</u> noted in the southeast corner of this area, where a spill had originated in the past, according to Cliff Young, Union City. However, based on the fact that pre-cleanup wipe sample #10, collected from this area, did not identify concentrations exceeding the given threshold levels, no further sampling from this eroded corner will be necessary.

#### Carpet in the Office Area

To date, only one wipe sample was collected from the carpet at the north end of the Office Area, S166-L-N, even though greater amounts of staining was observed on the carpet in other areas of the office, such as in the hallway between the wherehouse and office. Therefore, you are being given the option of replacing the carpet or collecting four additional wipe samples from the carpet. Areas shall be designated by an agency representative at the time of sampling. If you choose to remove the carpet, you will be required to assess whether or not the carpet is hazardous waste and proper disposal of this material will be required.

Ms. Tamara Royer Re: 29450 Union City Blvd. March 6, 1996 Page 3 of 5

Documentation of the assessment and disposal shall be submitted to Union City and Alameda County.

#### **Electrical Conduits**

One wipe sample, S166-L-L, collected from the electrical conduits above the office, identified lead at 4,110 ug/ft<sup>2</sup>. Based on this concentration and the low frequency of samples collected from the electrical conduits, there is a good chance that other areas of these conduits may contain concentrations of lead exceeding the cleanup threshold level of 3,000 ug/ft<sup>2</sup>. Therefore, all the electrical conduits need to be cleaned.

According to a conversation with Om Chopra on February 22, 1996, only the area around sample S166-L-L was wiped clean. However, according to my conversation with you on February 27, 1996, all the electrical conduits were cleaned. This office needs clarification on the type and extent of cleaning conducted in this area. As stated above, if this area has not yet been fully cleaned, then it will be required, along with confirmation sample results, prior to granting closure.

### Confirmation Samples

This office currently has no information on whether confirmation samples were collected from the areas of former sample S166-L-B and S166-L-L after these areas were cleaned a second time. If you have not already done so, confirmation samples should be collected from these areas. If confirmation samples have already been collected, please submit the sample results and locations to this office within the next week for review.

#### Protective Coating

There is currently a protective coating on the floors of the Charging Area, Repair Area, and Battery Wash Area. Based on information recently made available to this office, the protective coating was placed in the Charging Area prior to operations, however, the protective coating in the Repair/Battery Wash Area was placed down at least six months after operations at the request of Union City, due to observed leaks and spills. In conjunction with this work, a secondary protective coating was also placed in the Charging Area at the request of Union City due to some damaged coating. Therefore, the wipe samples already collected from the floor in these areas have not adequately characterized the

Ms. Tamara Royer

Re: 29450 Union City Blvd.

March 6, 1996 Page 4 of 5

extent and severity of the contamination resulting from past spills, which now lies beneath the protective coating. Based on this information, when the protective coating is removed from this area, you will be required to notify Union City and Alameda County to have an agency representative inspect the floor revealed with the removal of the protective coating. If areas of concern are noted on the floor, which previous samples did not address, then additional samples will be required.

#### **Wooded Pallets**

A pile of stained wooden pallets were noted in the Storage Area. These pallets need to be assesses for proper disposal. Sampling and disposal documentation shall be included in the final report to the agencies.

Prior to conducting the above work, at least one week notification shall be provided to Union City and this office. Agency representatives from both offices shall be present to witness this work.

Lastly, in December 1995, Yuasa Exide submitted a deposit of \$1,500.00 to Alameda County for oversight costs. This amount has been exhausted from the attached list of oversight activities. Before any additional oversight work can be provided, this office is requesting that an additional \$1,000.00 deposit be submitted to this office to cover the cost of anticipated sampling oversight, review of final report, closure letter, and resolution of any additional problems that would involve correspondence with Yuasa Exide and Union City.

If you have any questions or comments, please feel free to contact me at (510) 567-6763.

Sincerely.

Juliet Shin

Senior Hazardous Materials Specialist

ATTACHMENT

Ms. Tamara Royer

Re: 29450 Union City Blvd.

March 6, 1996 Page 5 of 5

cc:

Jay G. Swardenski Union City 34009 Alvarado-Niles Road Union City, CA 94587-4497

Cliff Young Union City 34009 Alvarado-Niles Road Union City, CA 94587-4497

Om Chopra Yuasa Exide, Inc. 645 Penn Street Reading, PA 19601

Herman Christensen Herman Christensen and Sons 801 American Street San Carlos, CA 94070

Acting Chief-File

# Summary of Oversight Work Site: Yuasa Exide 29450 Union City Blvd. Union City, CA

DATE	Action Taken	Hours Spent
11/16/95	Review of Oct 31, 1995 workplan	2
11/17/95	Documentation and phone conversation and Dep/Ref request letter	1.5
11/22/95	Phone conversation with Union City	2.5
11/20/05	about workplan  Phone conversation with Tamara Royer	0.5
11/30/95	and Jay Swardenski	0.5
12/22/95	Wrote letter in response to workplan	
	in conjunction with Union City	1.5
12/26/95	Review of revised work plan	1.5
12/26/95	Phone conversation with Tamara Royer	
	three times re additional samples	0.5
12/27/95	Admin. Charge	1
	(To process deposit)	
Case Transferre	d to new case worker-Juliet Shin	
1/23/96	Spoke to Tamara Royer and Madhulla	
	Logan re the planned cleanup work	0.8
2/1/96	Reviewed all the documents in the case	
	files, including workplans, and	•
	discussed site with Cliff Young and	
•	Madhulla Logan.	3
2/6/96	Spoke to Om Chopra and logged in	
	files	0.5
2/6/96	Left message for Cliff Young	0.1
2/7/96	Wrote letter to Om Chopra and	
	faxed	0.4
2/20/96	Spoke to Cliff Young, Om Chopra,	
	and Herman Christensen several times	
	and logged conversations in files. Re-	
	viewed inspection reports faxed to me	ή.
•	my Union City and sample results from	
	Yuasa Exide	2

2/22/96	Met with Union City, Dale Young,		
	Herman Christensen at the site. Spoke		
	to Om Chopra and to Jay Swardenski.		
	Typed up meeting notes and wrote draft		
	letter to site.	4.5	
2/27/96	Spoke to Tamara Royer re what		
	took place while she was gone, including		
	site meeting last week.	0.5	

RAFAT A. SHAHID, Assistant Agency Director

AGENCY DAVID J. KEARS, Agency Director

January 9, 1996

Yuasa Exide, Inc. ATTN: Tamara Royer 645 Penn Street Reading, PA 19601

Alameda County Environmental Health Services 1131 Harbor Bay Pkwy., #250 Alameda CA 94502-6577 (510)567-6700 FAX (510)337-9335

Yuasa GBC - 29450 Union City Blvd., Union City, CA

Dear Tamara Royer:

This office has received a letter from your office (Om P. Chopra) dated December 26, 1995 concerning the above site. Madhulla Logan of our office also responded to a request of yours in a letter from this office also dated December 26, 1995. Her letter should answer your questions but I must reiterate some comments, as follows.

Contact with other agencies, especially in unusual circumstances is an activity necessary for the oversight of any project. policy is consistent with our contract with the State Water Resources Control Board and we attempt to be consistent in all our activities. Often this office contacts other agencies and confirms what we thought to be true about one of their policies. When we find that a requirement is not needed, that does not excuse our need to contact the agency. Usually we ask clients to contact other agencies themselves, but when they ask us to do it, it is a chargeable activity.

In the big picture, we deal with 14 cities, 7 special districts, and 7 State agencies, and knowing all of their requirements at any one time in an ongoing challenge, rather than formal training.

We will give you a complete summary of all activities and time charged for this project, upon request or case closure.

If you have any questions or comments, please contact this office at 567-6782.

Sincerely,

Thomas Peacock, Manager

Environmental Protection Division

Gordon Coleman, Acting Chief - Files C: Jay Swardenski, City of Union City

# **ALAMEDA COUNTY** HEALTH CARE SERVICES **AGENCY**

R02835

RAFAT A. SHAHID, DIRECTOR

STID 5441

DAVID J. KEARS, Agency Director

November 16, 1995

Ms. Tamara Royer Yuasa Exide, Inc 645 Penn Street, Reading, PA - 19601 DEPARTMENT OF ENVIRONMENTAL HEALTH State Water Resources Control Board Division of Clean Water Programs UST Local Oversight Program 1131 Harbor Bay Parkway Alameda, CA 94502-6577 (510) 567-6700

Ref: Yuasa-GBC - 29450 Union City, Boulevard, Union City, CA

Dear Ms. Royer:

I am in receipt of the workplan, dated October 31, 1995 prepared by you for the above mentioned facility. This Department is in the process of reviewing the workplan in conjunction with the City of Union City Fire Department.

As I mentioned previously in a phone conversation, this Department would require that a oversight fees of \$1500.00 be remitted (payable to Alameda County Department of Environmental Health) to cover the cost involved in providing oversight for this project. The deposit refund mechanism is authorized in Alameda County Ordinance Code Section 3-140.6 and the account is charged at a hourly rate of \$90.00. If you have any questions, you can reach me at (510) 567-6764.

Sincerely,

Madhulla Logan

Hazardous Material Specialist



September 6, 1989

Dear Developer:

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

It has been brought to our attention you are intending to develop property in Union City. Should the property be contaminated with hazardous waste, it will be referred to our office for handling as an environmental investigation/remediation case. Under the authority of the Hazardous Waste Control Laws of the Health and Safety Code and the California Code of Regulations Title 22, we will at that time require you to submit a Plan of Correction. The Plan shall at least include the following items:

- A complete site ownership and use history. This shall include for all site uses information on the materials, chemicals and processes used, the wastes produced, the waste handling practices, and to-scale diagrams showing buildings, process locations, maintenance areas, chemical and waste storage areas (including tanks and sumps), wells, etc.;
- Complete copies of all environmental reports prepared for the property. These reports shall include copies of all analytical results;
- 3) A proposal to identify and sample potentially contaminated areas, to determine the vertical and lateral extent of known contamination, and to collect any background samples. The proposal shall identify the sample analyses and the California State Certified Laboratory to be used. The analytical methods shall be chosen based on information assembled for items 1) and 2) above;
- A statement indicating when a contaminant risk assessment and any contaminant remediation recommendations will be made; and
- 5) A deposit, payable to Alameda County, to be used toward our time spent handling the case.

The environmental investigation/remediation process can be lengthy. To avoid any delays, we urge you to begin Plan preparation as soon as site contamination is confirmed. Should you have any questions or concerns during the environmental investigation process, please feel free to contact us at (415) 271-4320.

Sincerely,

Ref (A Sheha)

Rafat A. Shahid, Chief, Hazardous Materials Division ALAMADA COULLE

LICALITE CARE SERVICES

AGENCIE

DAME LICEAND Agency Brooks

DEPAREMENT OF EDMROHMENTAL HEALTH Hespidous Maloriats Program 80 Syzen May, Ro. 100 Outland, t.A. 94621

271-4320

September 6, 1989

Danielle Stefani, Manager Union City Hazardous Materials Program 34009 Alvarado-Niles Road Union City, California 94587

Re: Letter for Developers of Sites in Union City

Dear Danielle,

Per our meeting of August 29, 1989, we have drafted a letter to be distributed to builders and developers as part of Union City's permit application package. This letter informs developers of our requirements for investigations of sites contaminated with hazardous waste. For your convenience, 20 copies of this letter are enclosed. Should you have any questions or comments, please do not hesitate to contact us. We thank you for your cooperation in this matter.

Sincerely,

Rafat A. Shahid, Chief,

PILA SLL)

Hazardous Materials Division

RAS: kac

enclosures

cc with enclosure:

Dave Duncan, Union City Fire Department
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Katherine Chesick, Alameda County Hazardous Materials Division
Files