

## **Chu, Eva, Public Health, EHS**

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**From:** Fletcher, Curtis[SMTP:Curtis.Fletcher@oldcastleprecast.com]  
**Sent:** January 29, 2001 2:12 PM  
**To:** 'Chu, Eva, Public Health, EHS'  
**Subject:** RE: 1901 Isabel Ave, Livermore, CA

-----Original Message-----

**From:** Chu, Eva, Public Health, EHS [mailto:EChu@co.alameda.ca.us]  
**Sent:** Tuesday, January 23, 2001 4:45 PM  
**To:** 'curtis.fletcher@oldcastleprecast.com'  
**Cc:** Weston, Robert, Public Health, EH  
**Subject:** 1901 Isabel Ave, Livermore, CA

Hi Curt,

I discussed the Scope of Work you submitted for the above referenced site with Rob Weston. We both agreed that the work proposed is not adequate to characterize potential soil contamination at the site.

This office would also like to see soil samples collected in native soil at the following locations:

- \* 1 to 2 feet below concrete vault;
- \* 1 to 2 feet below the plastic pipe (between concrete vault and leach pit);
- \* 1 to 2 feet below the leach pit.

Additional soil samples may be required around the leach pit. When this area is excavated, it will become evident if additional soil samples, to delineate vertical and/or horizontal extent of contamination, is necessary.

All soil samples should be analyzed for TPHg, TPHd, TPHmo, BTEX, MTBE, chlorinated solvents, and CAM 17 metals. The soil sample that appears most contaminated should also be analyzed for semi-volatiles (Method 8270).

And if groundwater is encountered, a grab groundwater sample should also be collected for the above analyses. It is recommended that water be purged from the pit prior to sampling. Groundwater at the site may flow west to northwesterly.

Please submit an amended Scope of Work to my email, fax, or hard copy. If you have any questions, please call. I would like to be present to witness the soil sampling.

evachu

Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
(510) 567-6762  
(510) 337-9335 fax

Eva:

Below is the amended Scope of Work proposal:

The Scope of Work I propose is as follows:

- 1) Remove the top dirt & concrete with a backhoe & dispose of the concrete as normal.
- 2) Cover the contents with tarp to protect from wind & rain.
- 3) Take a sample from the middle of basket one.
- 4) All material will be placed on tarp & covered.
- 5) Remove the vault.
- 6) Take sample between 1 & 2 feet below area vault was located.
- 7) Cover area with plywood to prevent any rainwater from entering.
- 8) Take sample between 1 & 2 feet below the plastic pipe (between concrete vault & leach pit)
- 9) Take a sample between 1 & 2 feet below leach pit.
- 10) Additional soil samples may be required around the leach pit. When this area is excavated, it will become evident if additional soil samples, to delineate vertical and/or horizontal extent of contamination, is necessary.
- 11) Test the samples at "Curtis-Tompkin" lab in Berkeley for TPHg, TPHd, TPHmo, BTEX, MTBE, chlorinated solvents, and CAM 17 metals. The soil sample that appears most contaminated will also be analyzed for semi-volatiles (Method 8270).
- 12) If the leach pit results are within the limits set by your department we will refill the leach pit with its original contents.
- 13) If the leach pit sample shows contamination, we will transport the contents to one of three available sites depending on the level of contamination. Those three sites are, Republic Services, Altamont Landfill or Safety Kleen in Bakersfield
- 14) The contents of the vault will be treated in a similar manner.
- 15) The vault will be destroyed on site if the contents are not contaminated.
- 16) If the vault contents are contaminated, the vault will be disposed of in the same manner listed above.
- 17) Transport of all material will be done with proper paperwork etc.

We will do a 24 hour turnaround on the samples, because we want to expedite this as quickly as possible. Our wish is to start Wednesday morning.

Sincerely yours,

Curtis Fletcher

1/26/01

Hi Eva,

Here's copies of my inspection reports. The file is an inch thick. needless to say there's lots of correspondence between all three companies:

started out as <sup>1</sup> Associated concrete products - Quickset  
new basis

now - utility vault co. aka <sup>oldcastle</sup> ~~new~~

Also I usually take duplicates when I shoot/develop photos during inspections you may keep these for your records.

I would recommend collecting the following soil samples. (in yellow)

~~that~~ I recommend that you visit the site. It won't look nearly as bad as some of these photos indicate but will give you an idea for the site layout

Photos 2-5 indicate boiler treatment, leakage area. Used Tamco corrosion + scale remover + pellet salt. Also form oil pump leaked routinely onto soil. It sat on 4x12 board. The upright tank contains pressurized form oil. ~~50~~ The 2 green 55 gal drums also stored bulk form oil

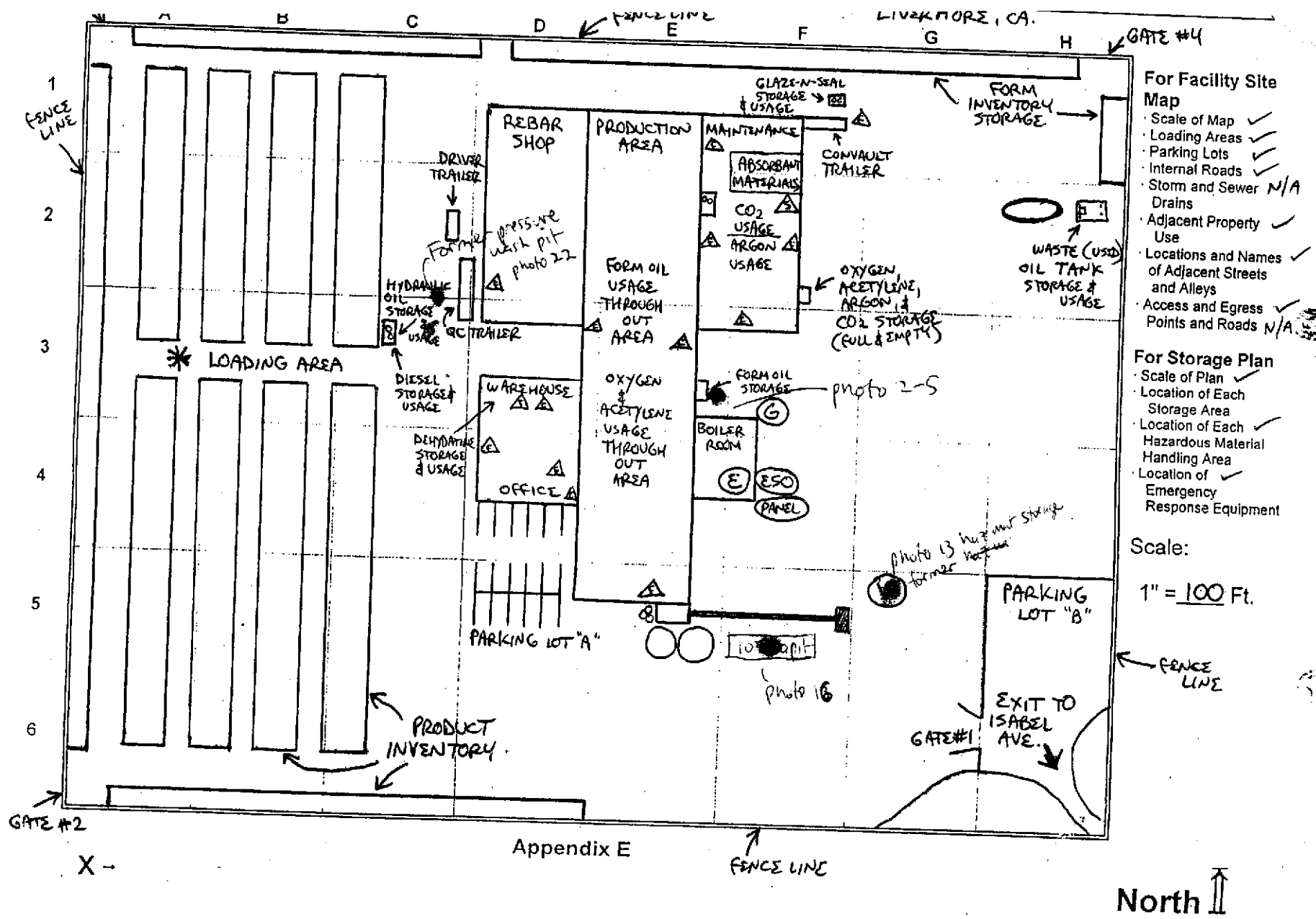
This area was a mess

Photo 13 was an area near the electrical transformer for the plant in the front where the stored haz mat. During rains the contaminated secondary containment berm would overflow + discharge haz waste  $\Rightarrow$  ground.

Photo 16 shows a 10x40 discharge pit from trench drain running down mid of plant. Not sure how much concrete admixture, metals entered this pit pH at least 11. They intend to bring this pit offline. It would be interesting to know if contaminants leaked beneath this pit area

Photo 22 indicates vault - pressure wash pit - recommend 2 samples  
one beneath <sup>vault</sup> pit one in leach field area.

If you want me to meet you at site call 55236 + well set up.



- For Facility Site Map**
- Scale of Map ✓
  - Loading Areas ✓
  - Parking Lots ✓
  - Internal Roads ✓
  - Storm and Sewer N/A
  - Drains
  - Adjacent Property Use ✓
  - Locations and Names of Adjacent Streets and Alleys ✓
  - Access and Egress Points and Roads N/A
- For Storage Plan**
- Scale of Plan ✓
  - Location of Each Storage Area ✓
  - Location of Each Hazardous Material Handling Area ✓
  - Location of Emergency Response Equipment ✓

Scale:  
1" = 100 Ft.

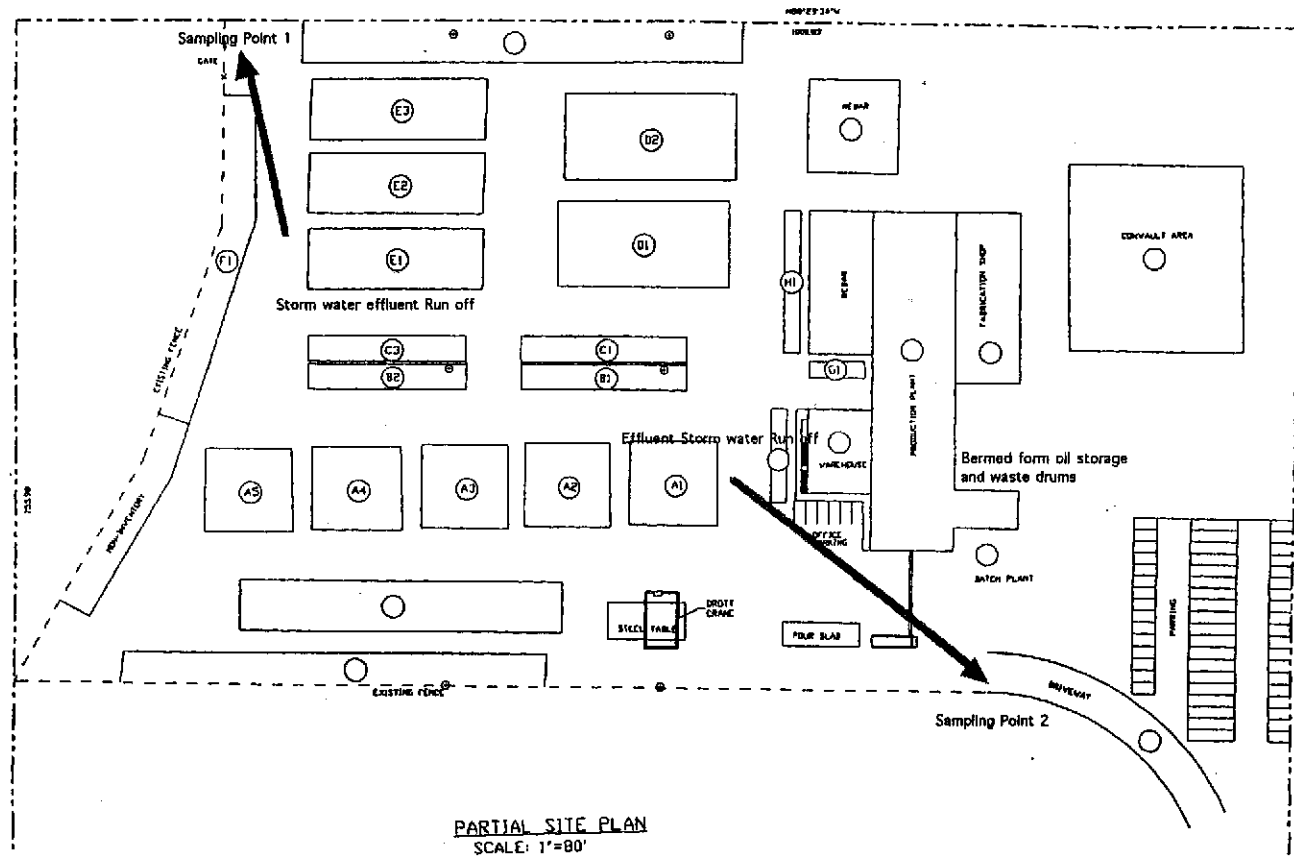
Appendix E

soil  
● = recommended samples  
i:\hmbp\formlappew61

OES Form 2732 (map) (07/97);ALCO E.H.S:na

North ↑

↑  
North



PARTIAL SITE PLAN  
SCALE: 1"=80'



Clean Water Program

Standard Stormwater Facility Inspection Report Form

Municipality: Livermore, 94550

Date: 12/15/00

Facility has closed or Facility Information has changed

Reason for Inspection:  First Inspection  Routine Inspection  Response to Complaint  Follow-up Follow-up Inspection Due:

NAME OF FACILITY: Utility Vault Co SITE ADDRESS: 1901 Isabel Ave

CONTACT NAME: Paul Amaral/Chris PHONE: (925) 426-1101 BUSINESS TYPE/ACTIVITY: vault fabrication SIC: 3272

Is the property owner different than the facility owner?  Yes  No If yes, complete the following

NAME: RMC PHONE: Mailing Address:

Is the facility covered under any other programs or permits? (Check all that apply.)  None  Sanitary sewer  Air quality  Hazmat business plan  Underground storage tanks  Aboveground storage tanks  Fire department (hazmat storage)  Hazmat waste generator  Other: Above ground storage tanks

Is the facility covered under a storm water permit?  Does not need Coverage  No, but may need to be (Refer to Regional Board)  Individual  General: Does the facility have a SWPPP?  Yes  No

N/A = Not Applicable; PTNL = POTENTIAL for Pollutant Discharge: 1 = low potential, 2 = medium potential, 3 = high potential  
 ACTUAL Type of Discharge: BMP: 0 = BMPs are effective, 1 = BMPs are fairly/almost effective, 2 = BMPs are not effective, 3 = No BMPs are implemented  
 PEX = Pollutant Exposure, NSW = Non-Stormwater Discharge

AREAS OF ACTIVITY	N/A	PTNL	ACTUAL Type of Discharge			REMARKS: Describe recommendations, requirements, and time to implement. Check box if remark is a requirement.
			BMP	PEX	NSW	
A. Outdoor Process/Manufacturing Areas	X					<input type="checkbox"/>
B. Outdoor Material Storage Areas		1	1			<input checked="" type="checkbox"/> Keep all lids covered, stores in covered secondary contained areas.
C. Outdoor Waste Storage/Disposal Areas		2	2	X		<input checked="" type="checkbox"/> Keep dumpsters, cans, batteries stored under cover or lower.
D. Outdoor Vehicle and Heavy Equipment Storage, Maintenance Areas		2	1			<input checked="" type="checkbox"/> Clean up leaks/spills as soon as noted using dry shop techniques
E. Outdoor Parking Areas and Access Roads		2	1			<input checked="" type="checkbox"/> Use absorbent; spill removal on all leaks spills as soon as noted. Dispose as haz waste.
F. Outdoor Wash Areas		2	1			<input checked="" type="checkbox"/> No outside washdown should be directed or allowed to flow offsite. Current washdown discontinued. Wash rack tank improperly closed slurry filled.
G. Rooftop Equipment	X					<input checked="" type="checkbox"/> Dispose of all water generated onsite properly. Don't discharge into lagoon. Has hot water treatment blowdown water, need to profile, dispose as haz. waste if necessary.
H. Outdoor Drainage from Indoor Areas		2	2	X	X	
I. Other (describe):	X	2	1			

COMMENTS/REMARKS/REQUIREMENTS Maintenance required in storm drain system  yes  no

Site inspection associated with change of ownership - previous compliance issues noted, concerning stormwater compliance.

The facility plans on installing an adequate concrete wash out station, plant washwater reclamation system where all concrete fabrication waste water is collected, not allowed to flow offsite, and recycled into batch mixing onsite. We discussed modifications including increasing the wash out / sedimentation area covering the 10x40' waste water accumulation area and plumbing all waste accumulation pits into above ground storage tanks.

Please provide a site plan/drawings outlining your proposal prior to implementation. Need to update general permit information to reflect any site changes  See attached for more comments.

PRIORITY FOR RE-INSPECTION:  1: First  2: Second  3: Third

ENFORCEMENT:  None  Verbal Notice  Administrative Action  Administrative Action w/ Penalty &/or Cost Recovery  Legal Action  Warning Notice

Facility Representative: [Signature] Inspector: Paul Amaral



Alameda County  
Clean Water Program  
Standard Stormwater Facility Inspection Report Form

Municipality: Livermore

Reason for Inspection:  First Inspection  Routine Inspection  Response to Complaint  Facility has closed or Facility Information has changed

NAME OF FACILITY: Utility vault SITE ADDRESS: 1901 Isabel Ave

CONTACT NAME: \_\_\_\_\_ PHONE: \_\_\_\_\_ BUSINESS TYPE/ACTIVITY: \_\_\_\_\_ PAGE 2 OF 2

ownership change or increased BMPs implemented. Please notify SWACB = PWDCB and my office of the above changes.

Stormdrains at front entrance by propane tank <sup>currently</sup> has concrete slurry flowing to it. Need to evaluate whether this drain functions where it drains to stormwater ponds. If so exclude contaminated water from flowing into it. Front 10x40 decline pit is at maximum capacity. <sup>need to empty</sup> ASP.

Need to remove, properly store old battery, <sup>disposal</sup> dipper. In pressure oil tank storage containment area water/form oil noted in secondary containment pit. Need to remove, properly dispose. This tank will likely be taken off line, also another 1100 gal <sup>above ground</sup> tank. Check with Ala Co Hazmat for necessary <sup>disposal</sup> requirements at (510) 567-6700.

Need to cover yard trash cans & large on site dumpster so that rainwater runoff will not cause contamination to run off site.

Need to install Best Management Practices BMPs around the perimeter of the site where runoff the potential for contaminated runoff to flow off site is currently high. Also around drop inlets if necessary. Need to evaluate this yard for runoff.

Please provide an update on each of the above within 30 days by 1/15/01.

Check with Ala Co Fire & Building Dept when constructing covered canopies/structures for authorization/requirements they may have.

SUBMITTED BY: Paul M. Smith REVIEWED BY: [Signature] DATE: 12/15/00

Alameda Countywide  
Clean Water Program  
Standard Stormwater Facility Inspection Report Form

Municipality Livermore 94550  
ie. 6/14/00  
Facility has closed or Facility Information has changed

6-27-00

Reason for Inspection:  First Inspection  Routine Inspection  Response to Complaint  Follow-up Follow-up Inspection Due: 7/14/00

NAME OF FACILITY: new basis SITE ADDRESS: 1901 Isabel

CONTACT NAME: Paul Amaral PHONE: (925) 426-1101 BUSINESS TYPE/ACTIVITY: vault fabrication / Above ground Storage SIC: 3272

Is the property owner different than the facility owner?  yes  no If yes, complete the following  
 NAME: Lone Star Aggregates PHONE: APN 946 1350 009 09  
 MAILING ADDRESS: PO Box 5252, Pleasanton, CA 94566

Is the facility covered under any other programs or permits? (Check all that apply.)  
 Air quality  Hazmat business plan  None  Sanitary sewer  
 Fire department (hazmat storage)  Hazmat waste generator  Underground storage tanks  Aboveground storage tanks  
 Other \_\_\_\_\_

Is the facility covered under a storm water permit?  Does not need Coverage  No, but may need to be (Refer to Regional Board)  
 Individual  General: Does the facility have a SWPPP?  yes  no

N/A = Not Applicable; PTNL = POTENTIAL for Pollutant Discharge: 1 = low potential, 2 = medium potential, 3 = high potential  
 ACTUAL Type of Discharge: BMP: 0 = BMPs are effective, 1 = BMPs are fairly/almost effective, 2 = BMPs are not effective, 3 = No BMPs are implemented  
 PEX = Pollutant Exposure, NSW = Non-Stormwater Discharge

AREAS OF ACTIVITY	N/A	PTNL	ACTUAL Type of Discharge			REMARKS: Describe recommendations, requirements, and time to implement. Check box if remark is a requirement.
			BMP	PEX	NSW	
A. Outdoor Process/Manufacturing Areas		2	1			<input checked="" type="checkbox"/> Some vault fabrication occurs outdoors
B. Outdoor Material Storage Areas		2	2			<input checked="" type="checkbox"/> Some drums noted stored outside not within secondary containment
C. Outdoor Waste Storage/Disposal Areas		2	1			<input type="checkbox"/>
D. Outdoor Vehicle and Heavy Equipment Storage, Maintenance Areas						<input type="checkbox"/>
E. Outdoor Parking Areas and Access Roads		2	1			<input type="checkbox"/>
F. Outdoor Wash Areas		3	3	X	X	<input checked="" type="checkbox"/> pressure washing currently flows to closed sump. not maintained
G. Rooftop Equipment	X					<input type="checkbox"/>
H. Outdoor Drainage from Indoor Areas		3	3	X	X	<input checked="" type="checkbox"/> concrete casting area drains outside to adjacent receiving lagoon runoff still noted from 3 different
I. Other (describe):		3	3	X	X	<input checked="" type="checkbox"/> sources, see comments below

COMMENTS/REMARKS/REQUIREMENTS Maintenance required in storm drain system  yes  no

Follow up site inspection to issues noted in the 5/2/00 previous inspection report and 5/30 response letter concerning stormwater compliance.

Housekeeping on the ~~SE~~ side of building has improved. Has obtained a gas containment tank for boiler blowdown water. This material is currently undergoing profiling for proper disposal. Retain receipts.

Conspicuous contamination has been removed, formerly noted in this area. Need to retain all waste profile & disposal receipts for contaminated soil.

There is a hazardous material storage. concrete bermed mobile pad  See attached for more comments.

PRIORITY FOR RE-INSPECTION:  1: First  2: Second  3: Third

ENFORCEMENT:  None  Verbal Notice  Administrative Action  Administrative Action w/ Penalty &/or Cost Recovery  Legal Action

Warning Notice

Facility Representative: Paul Amaral Inspector: [Signature]





Alameda Countywide  
Clean Water Program  
Standard Stormwater Facility Inspection Report Form

Municipality: \_\_\_\_\_



Reason for Inspection:  First Inspection  Routine Inspection  Response to Complaint  Facility has closed or Facility Information has changed

NAME OF FACILITY New basis		SITE ADDRESS 1901 Isabel	
CONTACT NAME	PHONE	BUSINESS TYPE/ACTIVITY	PAGE 2 OF 4

containing a 250 gal diesel tank, off spec admixture and some hudson spayers. I strongly recommend, as you have stated in your 5/30 response letter, installing a metal cover over all haz mat/waste storage areas to prevent runoff of rain water and runoff of the shallow bermed containment pad. I also strongly recommend the installation of a concrete filling pad next to the fuel tank(s) and obtaining a spill cleanup kit/absorbent new waste container for use in the event of a spill/release. The fuel tank haz mat storage pad is currently located 5' from a storm drain which may be obstructed. Need to site haz mat/waste storage & filling away from the storm drain or pour a berm to prevent spills from flowing into the storm drain.

Issues associated with process wash/waste water which currently flow or are directed into the adjacent receiving lagoon

① wash rack area - concrete pad slopes to drain flowing into a 4'6" x 8'6" x 6' dead sump. Recently fabricated vaults/tanks are power washed and fork lifts and other equipment are pressure washed in this area using Power<sup>Soap</sup> Klean 283, by Serille Co containing propylene glycol + butyl ether and methanol. Paul Amoral does not know how this waste water has been handled. Need to discontinue any discharge of waste water associated with either cleaning activity into the adjacent lagoon. We discussed the installation of a treatment system, ceasing washing off site or <sup>regularly</sup> pump out of this tank for <sup>profile & sprague</sup> disposal & proper waste water management/disposal. Need secondary containment for (1) 55 gal & (1) 40 gal Powerklean drum noted

SUBMITTED BY Paul M. Chis

REVIEWED BY

DATE 6/14/00



Alameda Countywide  
Clean Water Program  
Standard Stormwater Facility Inspection Report Form

Municipality: \_\_\_\_\_

Reason for Inspection: <input type="checkbox"/> First Inspection <input type="checkbox"/> Routine Inspection <input type="checkbox"/> Response to Complaint <input type="checkbox"/> Facility has closed or Facility Information has changed			
NAME OF FACILITY: New Basis		SITE ADDRESS 1901 Isabel	
CONTACT NAME	PHONE	BUSINESS TYPE/ACTIVITY	PAGE <u>3</u> OF <u>4</u>

Stored in wash rack area.

② In main plant concrete water clean up / discharge area where trench drain / grate inside covered plant flows into a 10x40' sediment liquid catchment / removal decline. It was noted that discharges from this area (pH of liquid = 11.0) currently flow to <sup>adjacent</sup> receiving lagoon. Need to prevent this discharge by pump out / haul to appropriate facility treatment + discharge of effluent with authorization from Reg 2 RWQCB - contact Vijay Patel of RWQCB for requirements / authorization, possible National Pollutant Discharge Elimination System Permit (NPDES) to discharge to adjacent lagoon.

③ Concrete batch mix overage noted currently dumped into receiving lagoon at entrance to plant containing evidence of liquid discharge. we discussed concerns associated with this activity that high pH discharge water contained in these discharges will likely percolate into groundwater. Need to cease ~~this~~ dumping in this area. As discussed create a designated waste dump pit designed to evaporate / handle this discharge and maintain at a frequency to keep it functional metal rebar - rebar noted in concrete material dumped.

After issues / comments on your 5/30 response letter where will hazardous wastes other than waste oil ie off spec add chemicals, waste oil filters, contaminated soil / absorbent be stored?  
Notes that all drums - containers will be moved to containment pads. Please use secondary containment pads for all liquids, preferably cover to keep out of rain.

SUBMITTED BY Paul M. Dine REVIEWED BY [Signature] DATE 6/14/00



Alameda Countywide  
Clean Water Program  
Standard Stormwater Facility Inspection Report Form

Municipality: \_\_\_\_\_

Reason for Inspection:  First Inspection  Routine Inspection  Response to Complaint  Facility has closed or Facility Information has changed

NAME OF FACILITY: New ball SITE ADDRESS: 1901 Isabel

CONTACT NAME: \_\_\_\_\_ PHONE: \_\_\_\_\_ BUSINESS TYPE/ACTIVITY: \_\_\_\_\_ PAGE 4 OF 4

4A please specify when metal covers <sup>outside</sup> over haz mat/waste storage will be completed.

6B Please submit a copy of your completed suppp by Aug 15, 2000.

Please include <sup>a</sup> training program for all workers handling haz mat/waste a minimum of once annually to include stormwater runoff concerns in writing in a language appropriate to the individual(s), signed by the employee.

Please respond to each of the above issues within 30 days by 7/14/00.

SUBMITTED BY Paula M. Smith REVIEWED BY [Signature] DATE 6/14/00



Alameda Countywide  
Clean Water Program  
Standard Stormwater Facility Inspection Report Form

5-12-00

Municipality Livermore, 94550

Date 5/2/00

Facility has closed or Facility Information has changed

Reason for Inspection:  First Inspection  Routine Inspection  Response to Complaint  Follow-up Follow-up Inspection Due: 6/2/00

NAME OF FACILITY: new basis SITE ADDRESS: 1901 Isabel Ave

CONTACT NAME: Paul Amoral PHONE: 925 426-1101 BUSINESS TYPE/ACTIVITY: vault fabrication SIC: 3272

Is the property owner different than the facility owner?  yes  no If yes, complete the following  
NAME: Rmc Lonestar PHONE: \_\_\_\_\_  
MAILING ADDRESS: \_\_\_\_\_

Is the facility covered under any other programs or permits? (Check all that apply.)  None  Sanitary sewer  
 Air quality  Hazmat business plan  Underground storage tanks  Aboveground storage tanks  
 Fire department (hazmat storage)  Hazmat waste generator  Other \_\_\_\_\_

Is the facility covered under a storm water permit?  Does not need Coverage  No, but may need to be (Refer to Regional Board)  
 Individual  General: Does the facility have a SWPPP?  yes  no

N/A = Not Applicable; PTNL = POTENTIAL for Pollutant Discharge: 1 = low potential, 2 = medium potential, 3 = high potential  
ACTUAL Type of Discharge: BMP: 0 = BMPs are effective, 1 = BMPs are fairly/almost effective, 2 = BMPs are not effective, 3 = No BMPs are implemented  
PEX = Pollutant Exposure, NSW = Non-Stormwater Discharge

AREAS OF ACTIVITY	N/A	PTNL	ACTUAL Type of Discharge			REMARKS: Describe recommendations, requirements, and time to implement. Check box if remark is a requirement.
			BMP	PEX	NSW	
A. Outdoor Process/Manufacturing Areas		2	2			<input type="checkbox"/> Sewer cement work is performed inside and outside on bare dirt
B. Outdoor Material Storage Areas		2	2	X		<input checked="" type="checkbox"/> many hazardous materials/wastes noted stored outside many within secondary containment some noted stored uncapped on bare dirt. conspicuous contamination to soil noted in compressor blowdown
C. Outdoor Waste Storage/Disposal Areas		3	3	X	X	<input checked="" type="checkbox"/> haz mat storage area at S. E. corner of building. Need to clean up all leaks/spills particularly form release fluid. ASAP using soil removal. Manage contaminated soil as hazardous waste
D. Outdoor Vehicle and Heavy Equipment Storage, Maintenance Areas		2	1			<input checked="" type="checkbox"/> 5 gal soap brush noted on the west side of the building. No washing pressure washing should direct or allow to flow any soap or other pollutants offsite
E. Outdoor Parking Areas and Access Roads		2	1			<input type="checkbox"/> There is no sewer system onsite. Has septic system + portable toilets
F. Outdoor Wash Areas		2	2			<input checked="" type="checkbox"/> currently boiler treatment blowdown heated waste water is allowed to soak into soil/flow offsite.
G. Rooftop Equipment	X					
H. Outdoor Drainage from Indoor Areas		2	1			
I. Other (describe):		3	3	X	X	

COMMENTS/REMARKS/REQUIREMENTS Maintenance required in storm drain system  yes  no

Follow up site inspection to evaluate compliance status and the potential for activities associated with this facility to impact stormwater/groundwater which flows from this site to two containment lagoons owned & maintained by Rmc Lonestar.

Compliance issues noted:  
many hazardous waste or unknown vessels noted outside on the east side of the property. Need has 10 (3) gal open buckets unknown material petroleum based, (7) 55 gal drums, 5 (5) gal drums and (1) 16 gal drum stored scattered about, some uncovered. Need to localize all hazardous materials/wastes. Need to dispose of all waste/off spec materials appropriately. Provide a copy of the disposal manifest within 30 days. store all haz materials <sup>wastes</sup> covered  See attached for more comments.

PRIORITY FOR RE-INSPECTION:  1: First  2: Second  3: Third

ENFORCEMENT:  None  Verbal Notice  Administrative Action  Administrative Action w/ Penalty &/or Cost Recovery  Legal Action  
 Warning Notice

Facility Representative: [Signature] 5-02-00

Inspector: [Signature]



Alameda Countywide  
Clean Water Program  
Standard Stormwater Facility Inspection Report Form

Municipality: \_\_\_\_\_

Reason for Inspection:  First Inspection  Routine Inspection  Response to Complaint  Facility has closed or Facility Information has changed

NAME OF FACILITY: New Basis SITE ADDRESS: 1901 Isabel Ave

CONTACT NAME: \_\_\_\_\_ PHONE: \_\_\_\_\_ BUSINESS TYPE/ACTIVITY: \_\_\_\_\_ PAGE 2 OF 4

on impervious <sup>flat</sup> surfaces, under cover preferably within secondary containment.

In curvant area:

Has secondary containment pad for (2) 55 gal drums stored in horizontal dispensing cradles. The secondary containment has an open drain plug. Need to restore the ability of this pad to contain liquid in the event of a spill/release.

NW side of building:

Has (4) 55 gal drums on pallet containing corrosion inhibitors/pallet release compounds. Need impervious surface, cover, secondary if possible.

Three pressure wash units noted stored onsite. It is presumed that these units are not operated. Please be aware that it is illegal to direct or allow to flow off site any non-rainwater contaminants such as oil grease, soap high pH or sediments. No pressure washing onsite.

Has (2) 5 gal buckets hazardous material (hydraulic oil?) stored outside next to tongue of office trailer.

South side of building:

Has 6 admixture tanks approx 1000 gal or greater  
I strongly recommend all hazardous material storage be within secondary containment to prevent runoff in the event of delivery, spill/release.

SUBMITTED BY Paul M. Price REVIEWED BY [Signature] DATE 5/2/00



Alameda Countywide  
Clean Water Program  
Standard Stormwater Facility Inspection Report Form

Municipality: \_\_\_\_\_

Reason for Inspection:  First Inspection  Routine Inspection  Response to Complaint  Facility has closed or Facility Information has changed

NAME OF FACILITY: New Basis SITE ADDRESS: \_\_\_\_\_

CONTACT NAME: \_\_\_\_\_ PHONE: \_\_\_\_\_ BUSINESS TYPE/ACTIVITY: \_\_\_\_\_ PAGE 3 OF 4

East side of building  
 Hazardous waste / hazardous materials storage area in the SE corner  
 housekeeping is poor. Conspicuous spillage noted from compressor blow  
 down, form release pumps out of drums and improper storage, cleanup  
 - need to store all vessels covered with tight fitting bung plugs  
 store all vessels and transfer hoses on impervious, preferably secondary  
 contained areas  
 - need to clean up by soil removal conspicuous contamination noted in  
 this area, ASAP.

The boiler treatment blowdown area continues to be a persistent and  
 routine source of contamination from Tanco corrosion & scale remover and  
 pellet salt to groundwater or runoff. you are required to either capture  
 all discharge from this area and dispose of appropriately or apply to  
 the CA Regional Water Quality Control Board for a National Pollution Discharge  
 Elimination System <sup>(NPDES)</sup> permit to discharge this waste. ~~inside~~

There is a trench drain running down the middle of the fabrication  
~~warehouse~~ warehouse. This drain <sup>slopes to</sup> approx 1x3 ~~in~~ also extends outside  
 and connects to a 10 x 40 sediment catchment removal decline ramp.  
 During rainfall/storms there is concern that the capacity of this system  
 is inadequate and would cause overflow of concrete waste to flow  
 downslope offsite into the adjacent lagoons. We discussed measures  
 to attempt to minimize <sup>contaminated</sup> runoff from this area.

SUBMITTED BY Paul M. [Signature] REVIEWED BY [Signature] DATE 5/2/00



Alameda Countywide  
Clean Water Program  
Standard Stormwater Facility Inspection Report Form

Municipality: \_\_\_\_\_

Reason for Inspection:  First Inspection  Routine Inspection  Response to Complaint  Facility has closed or Facility Information has changed

NAME OF FACILITY: New hail SITE ADDRESS: 1901 Isabel

CONTACT NAME: \_\_\_\_\_ PHONE: \_\_\_\_\_ BUSINESS TYPE/ACTIVITY: \_\_\_\_\_ PAGE 4 OF 4

I informed this facility that based on the likelihood of contaminated runoff from ~~this facility~~ the boiler treatment breakdown and from the cement fabrication/clean up water to flow off site that you are required to ~~also~~ apply for and adhere to all of the requirements of a General Industrial Activities Permit (General Permit). I provided application forms. Submit a notice of intent to the State Water Board within 7 days by 5/9/00.

Additional requirements of a General Permit which is based on standard Industrial Code 3272 Concrete Products except Block/Brick not elsewhere classified are:

- Preparation of a Stormwater Pollution Prevention Plan (SWPPP) handout provided
- Monitoring runoff 2x/wet season for Total suspended solids, pH, salinity, total organic carbon or total oil & grease and any other contaminants likely to be present
- Perform dry & wet season monitoring for stormwater exposure & removal.
- Prepare an annual report to SWRCB.

Provide a written response to me regarding your proposal/status regarding each of the above issues by 6/2/00

Have the following handouts: when runoff is everybody's business, commercial industrial business brochure, clean it right poster, General Permit Application, SWPPP & monitoring Plan handouts.

SUBMITTED BY: Paul M. [Signature] REVIEWED BY: [Signature] DATE: 5/2/00

**Chu, Eva, Public Health, EHS**

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**From:** Chu, Eva, Public Health, EHS  
**Sent:** January 23, 2001 4:45 PM  
**To:** 'curtis.fletcher@oldcastleprecast.com'  
**Cc:** Weston, Robert, Public Health, EH  
**Subject:** 1901 Isabel Ave, Livermore, CA

Hi Curt,

I discussed the Scope of Work you submitted for the above referenced site with Rob Weston. We both agreed that the work proposed is not adequate to characterize potential soil contamination at the site.

This office would also like to see soil samples collected in native soil at the following locations:

- 1 to 2 feet below concrete vault;
- 1 to 2 feet below the plastic pipe (between concrete vault and leach pit);
- 1 to 2 feet below the leach pit.

Additional soil samples may be required around the leach pit. When this area is excavated, it will become evident if additional soil samples, to delineate vertical and/or horizontal extent of contamination, is necessary.

All soil samples should be analyzed for TPHg, TPHd, TPHmo, BTEX, MTBE, chlorinated solvents, and CAM 17 metals. The soil sample that appears most contaminated should also be analyzed for semi-volatiles (Method 8270).

And if groundwater is encountered, a grab groundwater sample should also be collected for the above analyses. It is recommended that water be purged from the pit prior to sampling. Groundwater at the site may flow west to northwesterly.

Please submit an amended Scope of Work to my email, fax, or hard copy. If you have any questions, please call. I would like to be present to witness the soil sampling.

*evachu*

Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
(510) 567-6762  
(510) 337-9335 fax

*email: lschipper@rmcpmi.com  
vandenbyzen . . . . .*

*cc correspondence: Louis Schipper  
RMC Pacific Material  
PO Box 5252  
Pleasanton, CA 94568*



## **Smith, Paul**

---

**From:** Smith, Paul  
**Sent:** Friday, January 19, 2001 10:59 AM  
**To:** 'Curtis Fletcher'  
**Subject:** washout station at Utility Vaults and other misc. concerns, 1901 Isabel Ave., Livermore

Hi Curt,

Thanks for meeting yesterday. I'm hoping some of the ideas we kicked around were useful.

As I was making up notes of our meeting I thought of a couple of things which I hope can be addressed or included in the workplan. My hope is that it might make the workplan development more straight forward:

- You have currently devised a temporary wash out/water recycling area outside exposed to rainwater run-on and constructed of sandbags. This system, although an improvement from previous procedure, is still inadequate. Please provide a drawing for the permanent washout/dewatering pad for concrete pour and cleanup activities associated with your operation. The plan should define the measurement of the bermed and covered area, capacity of wash out pit, total wash pit capacity, approximate anticipated loading of wash water and sediments generated per day/week, size of the bin used to contain sediments/concrete routinely cleaned out of the wash collection pit, drainage from all roof surfaces and location and frequency disposal of concrete refuse accumulated from the washout pit. Also specify a timeline for the installation of the berm, overhead cover, gutter diversion, pump/hose modification.
- Please include within the bermed washout pad area the washdown pump and hose. This temporary setup is not currently situated within the sandbagged area.
- Kick outs from two downspouts of two roof drains currently terminate upgrade from the sandbagged (proposed bermed area). This looks like it will cause problems to the segregated washwater/ pad concept. Please develop a plan to exclude run-on from these two sources.
- Please state a commitment to manage water generated associated with the wash out station and an agreement that, if needed, you will install a pump and auxiliary tank of sufficient capacity to eliminate non rain water runoff from flowing offsite from this area.

Other issues requiring attention:

- You agreed to continue to haul off plant wash water from the center trench drain running down the center of the covered fabrication plant which flows into an approximately 10X40 foot area. You intend to eliminate all wash water entering into this pit. This will require eliminating all wash activity inside the covered plant area or redirect any such water into the new covered washpad area. Please address this matter. You had also mentioned discontinuing the steam curing process currently implemented in favor of process using heat, where heaters would be installed inside the plant. This would alleviate water generated from the steam producing units to this pit area. I'm assuming an April 1, deadline for discontinuing this process. Please keep me posted particularly if this date is not realized.
- Please clean out the sediments from around the drop inlet located inside the sand bags surrounding it, located approximately 20 feet from the 10X40 foot pit.
- A considerable amount of trash/debris was noted thrown over the fence east of the employee parking area. Please have this material removed at a frequency necessary to eliminate pollution from entering the creek.
- You had mentioned bringing the water boiler/treatment system off-line in favor of a different concrete process and had tentatively proposed April 1, 01 as a projected target date for this to occur. Please let me know if this does not occur.
- Please check with County Fire (510) 670-5853 and Building (510) 670-5440 inspection departments for necessary authorization prior to construction of the covered structure.
- When the pressure tank for form oil distribution is brought off line, please check with county Hazmat, Rob Weston (510) 567-6781 for cleanout/disposal requirements he may have.

Thanks in advance for your good efforts to bring your operation up to date regarding stormwater compliance. Please call me if you want to discuss any of the above issues at (510) 670-5236.



a division of  Oldcastle Precast, Inc.

[www.oldcastle-precast.com](http://www.oldcastle-precast.com)

1901 Isabel Ave. • Livermore, CA 94550

Phone (925) 426-1101  
Fax (925) 484-2591  
[curtis.fletcher@oldcastleprecast.com](mailto:curtis.fletcher@oldcastleprecast.com)

## Fax Cover Sheet

To: Robert Weston  
Company: Alameda County Hazardous Waste Management  
From: Curt Fletcher  
Date: January <sup>18</sup>~~17~~, 2001

Number of Pages including cover: 3

Subject: Pressure washer water/oil separator

Robert:

Thank you for your phone conversation. After finding the person that actually installed the unit, I'm getting a different version of its construction & history. The last Safety Coordinator gave me a different story. A truck driver that had experience with septic tank systems installed the oil water separator in 1990. I've included a drawing of how the system is arranged.

As you can see from the drawing there are two parts to the system. The first being the oil water separator & the second being the leach area for the water run off. The line going from the vault to the leach area was about half way up the side of the separator. I've been told the three sediment baskets are still in the vault. I was also told the baskets were full of sediment (having never been cleaned) when the vault was filled with dirt & concrete blocks. Previous people said the water was allowed to evaporate before the vault was filled.

The Scope of Work I propose is as follows:

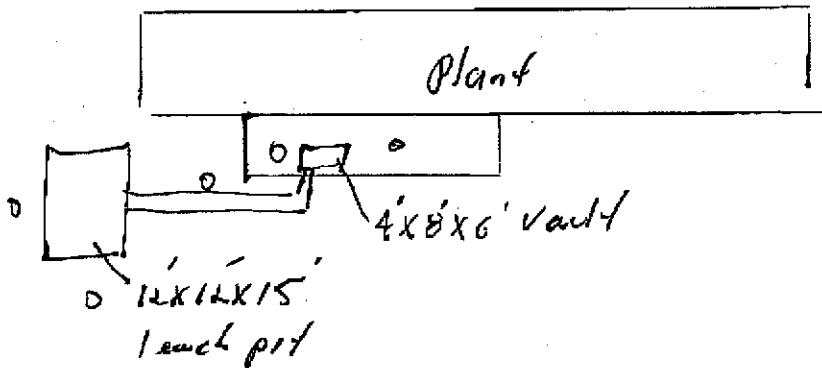
- 1) Remove the top dirt & concrete with a backhoe & dispose of the concrete as normal.
- 2) Remove the contents of each basket to a tarp.
- 3) Cover the contents with tarp to protect from wind & rain.
- 4) Take a sample from the top of basket one, the middle of basket two & at the bottom of basket three.
- 5) Cover vault with plywood to prevent any rainwater from entering.
- 6) Test the samples at "Curtis-Tomkin" lab in Berkeley for Diesel Fuel, motor oil, solvents, sulfides & the CAM 17 test for metals.
- 7) Dig to the pipe level of the leach pit, take a sample & refill the hole while waiting for the results.
- 8) If the leach pit results are within the limits set by your department we will leave the leach pit as is.
- 9) If the leach pit sample shows contamination we will dig out the leach pit & have the contents sent to either the Livermore Landfill or Safety Kleen's landfill in Bakersfield depending on the test results.
- 10) The contents of the vault will be treated in a similar manner. If the results are within the limits set by your department we will remove the vault and backfill the hole with the contents of the vault.
- 11) If the basket samples are contaminated we will dispose of them in the same manner as in step 9 above.
- 12) Transport of all material will be done with proper paperwork etc.

As per our phone conversation this morning, Paul suggested we sample the first basket & the leach pit area only, but we can go either way depending on your recommendations.

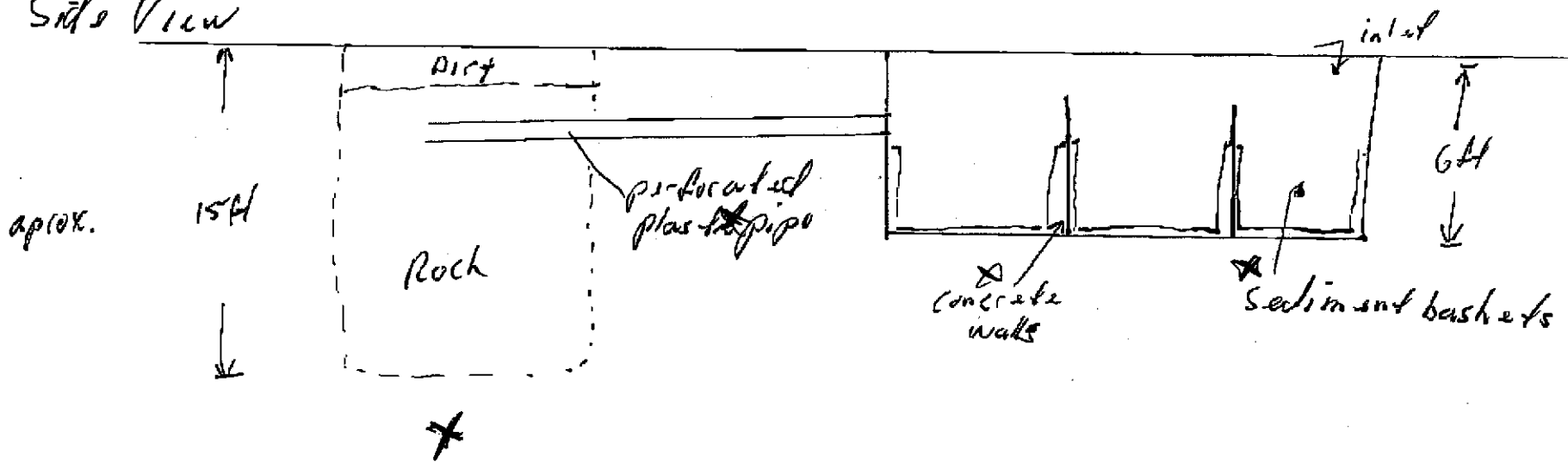
If you have any questions or concerns please call me on my cell phone - 925-383-6493.

Sincerely yours,  
Curtis Fletcher  
Safety Coordinator  
Pleasanton/Oakland/Livermore

Top View



Side View



white -env.health  
 yellow -facility  
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH  
 Hazardous Materials Inspection Form

1131 Harbor Bay Pkwy.  
 Suite 250  
 Alameda, CA 94502-6577  
 (510) 567-6700

II, III

Site ID #3200 Site Name Utility Vault Today's Date 1/31/01

II.A BUSINESS PLANS (Title 19)

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

Site Address 1901 Isabel  
 City Livermore Zip 94 Phone

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

Inspection Categories:

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

II.B ACUTELY HAZ. MATLS

- \_\_\_ 10. Registration Form Filed 25533(a)
- \_\_\_ 11. Form Complete 25533(b)
- \_\_\_ 12. RMPP Contents 25534(c)
- \_\_\_ 13. Implement Sch. Req'd? (Y/N)
- \_\_\_ 14. Offsite Conseq. Assess. 25524(c)
- \_\_\_ 15. Probable Risk Assessment 25534(d)
- \_\_\_ 16. Persons Responsible 25534(g)
- \_\_\_ 17. Certification 25534(i)
- \_\_\_ 18. Exemption Request? (Y/N) 25536(b)
- \_\_\_ 19. Trade Secret Requested? 25538

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

Comments:

Collect soil samples as outlined in Scope of Work.

Additional Soil Samples should be collected as follows:

- 2 soil samples (~ 2 feet belowgrade) at former hazardous mat/waste storage area -
- One soil sample from low point in area where farm oil is stored
- ~~the~~ wipe sample from settling pond

Recommend that a phase I environmental assessment be conducted for the entire facility

Analyze soil samples for TPHg, TPHd, TPHno, BTEX, chlorinated solvents, and CAM 17 metals  
 Samples are to be kept at 45° F or less

III. UNDERGROUND TANKS (Title 23)

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

Rev 6/88

II, III

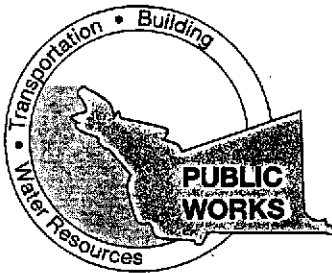
Contact: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: *[Handwritten Signature]*

Inspector: EVA CHU

Signature: *[Handwritten Signature]*



COUNTY OF ALAMEDA  
**PUBLIC WORKS AGENCY**  
MAINTENANCE AND OPERATIONS DEPARTMENT  
951 Turner Court, Hayward, CA 94545-2698  
(510) 670-5500 • Facsimile No. (510) 670-5251

June 28, 2000

Mr. Paul Amaral  
Environmental Compliance Manager  
New Basis  
1901 Isabel Avenue  
Livermore, CA 94550

**\*\*\*\* Notice of Violation \*\*\*\***

Re: Stormwater compliance at: New Basis facility, 1901 Isabel Ave., Livermore,  
CA 94550

Dear Mr. Amaral:

This letter follows up on continued illicit discharge violations noted in previous inspection reports conducted on March 3, 1999, April 5, 1999, May 2, 2000 and June 14, 2000 at the above site. Three separate discharges associated with your concrete mixing and product fabrication either direct or allow contaminated flow into the receiving lagoon adjacent to your facility. The concern is that pollutants contained in these discharges will negatively effect water quality by lateral flow or direct percolation into groundwater.

Direct discharges are still noted from each of the following:

1. Concrete batch mix overage was noted dumped directly down the steep embankment into the receiving lagoon at the entrance to your plant. There was evidence of liquid concrete cleanup rinse water, concrete slurry containing rebar and also some garbage/debris were noted deposited in this area. We discussed creating a concrete mixer dump out station in which free flowing liquid concrete could be placed into an impervious area which could be dried up and not allowed to percolate into groundwater. You are required to devise a solution to avoid direct pump out of high pH waste directly into the lagoon.
2. In the main above ground tank fabrication warehouse, excess concrete clean up water flows into a trough drain along the length of the enclosed warehouse then flows outside to a trench drain and into an approximately 10 x 40 foot sediment/liquid catchment containment decline sump. It appears that this sump ultimately flows via a metal service box and drop inlet into the adjacent lagoon. During my site visit on June 14, using pH paper I came up with a pH between 10 and 11 from freestanding liquid in the decline sump. We discussed capturing and recycling this discharge for use in mixing the next batch if feasible or retention of this waste water for appropriate treatment and/or disposal.

*eliminated  
barriers (Kraus)  
Signage*

Post-it® Fax Note	7671	Date	12/1/00	# of pages	1
To	Luis Schipper	From	Paul Smith		
Co./Dept.	Pac Pacific	Co.	ACPWA/CWP		
Phone #		Phone #	(510) 670-5236		
Fax #	(925) 426-2231	Fax #	(510) 670-5251		

Mr. Amaral  
 June 21, 2000  
 page 2 of 2

3. On the west side of the vault fabrication plant a heavy equipment pressure wash station and new tank vault pressure wash pad were noted. Paul Amaral informed me that there is a 5 x 8 x 6 foot underground storage tank outside uncovered which had been installed to retain wash water. During rainfall drainage from a large concrete pad collects rainwater which flows into this system. It is unclear whether there is an overflow or another drainage system to handle the volume of rainwater associated with winter flows into this system. It was also unclear how contaminated waste water associated with this area has been managed historically or whether sediments in this tank have been routinely maintained. My concern is that oil/grease, metals, form oil, concrete caustic waste, concrete add mixtures, soaps containing glycol and methanol, and other hazardous wastes associated with tank construction or equipment maintenance from this area is being improperly managed and is either directed or allowed to flow off-site.
  - You are required to profile this waste to determine if it exceeds hazardous waste levels specified in Section 66261.21 through .24, Title 22, CA Code of Regulations. Contact Robert Weston of Alameda County Environmental Health at (510) 567-6781 for more information concerning this matter. Based on appropriate analysis you are directed to manage this waste appropriately. It will be necessary to capture and manage contaminated waste water and to exclude uncontaminated rainwater run-on from flowing into this area, by the installation of a waste water retention, recycling, or a treatment system and the construction of berms and/or the installation of alternate drop inlet drains.
  - You are required to evaluate the existing plumbing and discharge/disposal practices for disposal of wash and stormwater in the wash pad area and to outline any proposed changes for segregating (contaminated from uncontaminated discharges) and processing contaminated washwater.

*discontinue pressure wash*

*wash elsewhere*

**Any point source or non point source discharges of non-rainwater from your site require a National Pollutant Discharge Elimination System (NPDES) Permit from the Region 2, CA Water Quality Control Board. If you cannot eliminate discharges from any of the above sources you are directed to contact Greg Walker at (510) 622-2437.**

Other compliance issues requiring attention:

4. There are still a two drums of liquid hazardous materials and wastes noted stored outside uncovered. I strongly recommend that you store all liquid hazardous materials and wastes under cover, particularly Power Kleen soap drums noted in the wash pad area, on concrete surfaces, within secondary containment.

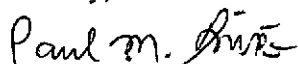
Mr. Amaral  
June 20, 2000  
page 3 of 3

5. A couple of the secondary containment bunkers on site were noted to have only about 7 or 8 inches of freeboard and are exposed to rainwater run-on and run-off making secondary containment useless during the rainy season. During our June 6, 2000 meeting you mentioned that you plan on constructing canopies where hazardous material/waste storage occurs outside. You should check with Building and Fire Departments to make sure that they don't have any prohibitions to your cover design. Please specify when these covers will be completed.
6. The secondary containment bunker and fueling area was noted on a dirt surface. The fueling pad is also unpaved and was noted to be five feet away from a storm drain drop inlet. I strongly recommend either relocating this haz mat storage and fueling location further away from this storm drain or that you construct a berm to impede the flow of contamination into this drain in the event of a spill or release and by constructing a concrete fueling pad next to the tank storage area. As discussed, please locate a spill kit (two covered absorbent containers, one for clean material one for contaminated waste material) in the fueling/haz mat storage area.

**Please provide a written response outlining proposed actions to address each of the above issues by July 14, 2000. This is a request for a report as authorized in Section 13.08.110 of the Stormwater Management and Discharge Control portion of Alameda County Ordinance Code. Failure to respond may result in further enforcement actions.**

Please contact me if you wish to discuss any of the above requirements at (510) 670-5236.

Sincerely,



Paul M. Smith  
Hazardous Materials Specialist

c:

Rob Weston, Alameda County Environmental Protection Division, 1131 Harbor Bay Parkway, Alameda, CA 94502  
Keith Lichten/Greg Walker, SF Regional Water Quality Control Board, 1515 Clay St., Suite 1400, Oakland, CA 94612  
Steve Jones/Sharon Gosselin, Alameda County Public Works Department, 951 Turner Ct., Hayward, CA 94550  
Luis Schipper, RMC Lonestar property owner, 6601 Koll Center Parkway, Pleasanton, CA 94566  
Bob Chambers, Alameda County District Attorney's Office, Consumer & Environmental Protection Division, 7677 Oakport, Suite 400, Oakland, CA 94621





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street WTR 9  
San Francisco, CA 94105

5291  
6-1-9  
RW

May 13, 1999

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

99 MAY 19 AM 11:41  
ENVIRONMENTAL  
PROTECTION

Eric Moore  
Reliable Trucking Inc.  
51 El Charro Road  
Pleasanton, CA 94588

Dear Mr. Moore:

The U.S. Environmental Protection Agency (EPA) regulates waste discharges to the ground in order to protect both public health and groundwater. On April 30, 1999, the EPA's Underground Injection Control (UIC) program inspected your facility at 51 El Charro Road, Pleasanton, CA. Based on that inspection, we have observed the following: a pressurized wash area is used to clean hauling trucks; soap is used to assist in the removal of oil, grease and dirt from the trucks; the wastewater drains into a horizontal drain; a stormwater drain next to a chemical storage area is connected to the horizontal drain; the horizontal drain feeds into a two-stage, below grade concrete clarifier system; the clarifier system feeds into a below-grade concrete holding silo; a mechanical pump feeds water from the silo to an above ground water tank; a water truck periodically hauls the wastewater from the water tank away.

Although this system appears to be self-contained, systems which dispose of industrial wastewater below grade are a concern to EPA due to the potential of groundwater degradation from the contaminated wastewater. Under Section 1445 of the SDWA and 42 U.S.C. §§ 300h-2 and 300j-4, EPA is authorized to require facilities to provide information to assist us in our determination procedures. Accordingly, we are requesting information from Reliable Trucking about the nature of its activities at 51 El Charro Road, Pleasanton, CA. Specifically, EPA is requiring Reliable Trucking to submit a information detailing the following activities:

- 1) As-builts or diagrams of the system as outlined in the first paragraph of this letter and a description of how the pressure wash water is treated in this system;
- 2) The number of trucks and other equipment washed at the facility per year;
- 3) The frequency the horizontal drain, concrete silo and clarifier chambers are maintained and/or pumped of sediments;
- 4) The frequency that the absorbent materials in the clarifier systems are maintained or replaced;
- 5) The volume of wastewater generated on a monthly and yearly basis;
- 6) The analytical analyses performed on the wastewater or sludge which accumulates

in the tanks in order to characterize these for disposal purposes;

- 7) The final disposition destination of the wastewater or sludge removed from any of the wash system tanks; and
- 8) The testing process in place to ensure no leakage is occurring from any component in the system.

All information requested should be submitted by June 18, 1999 to:

United States Environmental Protection Agency Region 9  
75 Hawthorne Street  
MailCode WTR-9, Ground Water Office  
San Francisco, CA 94105  
Attn: Joaquín Cruz


We reserve our rights to reevaluate compliance and to take appropriate action at any time. This letter deals only with underground injection laws and states no position on Reliable Trucking's compliance with other laws. All submittals made in response to this letter must be accompanied by the following certification, which is to be signed by a responsible agency official in accordance with 40 C.F.R. § 144.32(d):

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

This request for information is not subject to review by the Office of Management and Budget (OMB) under the Paperwork Reduction Act because it is directed to fewer than ten persons and is an exempt investigation under 44 U.S.C. § 3518(c)(1) and 5 C.F.R. § 1320.4(a)(2). If you believe that this information is confidential business information as defined by 40 C.F.R. Part 2, Subpart B you assert a claim in the manner specified in 40 C.F.R. § 2.203(b) for part or all of the information requested. If no claim accompanies the business information at the time the EPA receives it, EPA may make it available to the public without further notice. Reliable Trucking may not withhold from EPA any information on the grounds that it is confidential business information.

We urge your prompt attention to this matter. If you have any questions, please contact Joaquín Cruz of my staff at (415) 744-1839.

Sincerely,



Laura Tom Bose, Chief  
Ground Water Office

cc: Robert Weston, Alameda County Health Agency, Department of Environmental Health  
Paul Smith, County of Alameda, Public Works Agency



51 EL CHARRO ROAD, PLEASANTON, CA 94588-9605

925

(510) 449-8334

(800) 952-3344

FAX (510) 443-1461

925

September 20, 1999

United States Environmental Protection Agency Region 9


75 Hawthorne Street  
Mailcode WTR-9, Ground Water Office  
San Francisco, CA 94105  
Attn: Joaquin Cruz

Dear Mr. Cruz,

Pursuant to your letter of 05-13-99 to Mr. Eric Moore, I have listed below the responses you have requested.

1. See attached diagram.
2. 1040 annual
3. Once per year minimum, or as needed.
4. Semi-annually – This is not enough, we are making policy changes now.
5. Approximately 19,000 gallons monthly and 152,000 for 8 months per year of operation.
6. None, except those performed by waste collection company – Clearwater Environmental Management: P.O. Box 7420, Fremont, CA 94537-7420
7. Per Clearwater Environmental, the site is Alviso Independent Oil: 5002 Archer Street, Alviso, CA CAL 000161743 Phone (510) 797-8511
8. Visual only with absorbent material at possible leak locations.

Sincerely,



Ron Askham  
Vice President

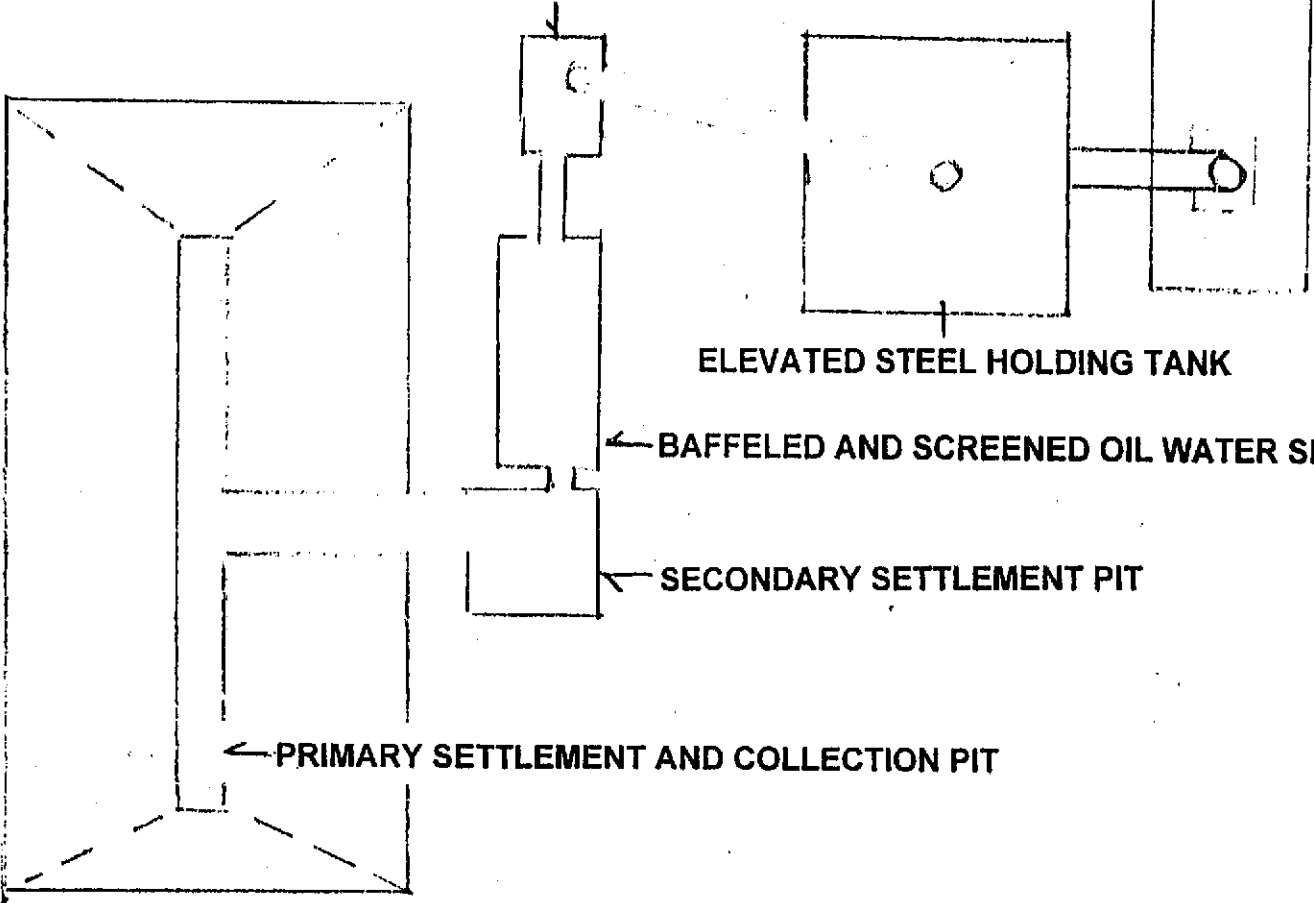
99 NOV 24 PM 2:47  
ENVIRONMENTAL  
PROTECTION

"EQUAL OPPORTUNITY EMPLOYER"

WATER TRUCK

CONCRETE SUMP WITH SUBMERSIBLE PUMP

AND FLOAT SWITCH



ELEVATED STEEL HOLDING TANK

BAFFELED AND SCREENED OIL WATER SEPARATOR

SECONDARY SETTLEMENT PIT

PRIMARY SETTLEMENT AND COLLECTION PIT

COVERED CONCRETE WASH AREA

entered 4/8/99 PMS



Alameda Countywide  
Clean Water Program  
Standard Stormwater Facility Inspection Report Form

Municipality: Livermore, 94550

Reason for Inspection:  First Inspection  Routine Inspection  Response to Complaint  Facility has closed or Facility Information has changed

NAME OF FACILITY: ACP, Inc / Quickset SITE ADDRESS: 1901 Isabel

CONTACT NAME: Eric Waisanen PHONE: (925) 426-1100 BUSINESS TYPE/ACTIVITY: concrete fabrication PAGE 1 OF 2

Follow up inspection to issues noted in previous, 3/5/99, site inspection report relating to stormwater compliance, haz mat / haz waste storage / housekeeping.

Eric Waisanen provided a copy of the response letter which he had recently sent to me regarding the above.

- The secondary containment berm area (approx 18 x 10 x 6) has been emptied of drums - tanks previously stored within it. There is still contaminated form oil and waste oil in this containment berm approximately 2-3" deep ~~which~~ the volume of which is increasing with rain which is occurring during this visit.

- In waste oil storage area in the northeast corner of the yard has 500 gal concrete tank stored on bare soil/sand. Has (4) 55 gal drums on a pallet containing partial/full what appears to be waste oil. Three of these drums have bung plugs uncapped. need to cover.

need to cover <sup>each drum</sup> store under cover preferably on a cement pad and within secondary containment to avoid rainwater runoff and increased disposal costs for waste oil - secondary containment runoff. Also ~~is~~ based on the great physical distance of the hazardous waste accumulation areas, there is potential for spillage in transfer from point of generation to the point of storage you might want to consider a centralized hazardous materials / waste storage area properly designed as described above nearer to the fabrication / waste generation areas of the plant. need to remove & manage all wastes above appropriately.

SUBMITTED BY Paul M. Diaz REVIEWED BY Eric Waisanen DATE 4/5/99



Alameda Countywide  
Clean Water Program  
Standard Stormwater Facility Inspection Report Form

Municipality: Livermore

Follow up

Reason for Inspection:  First Inspection  Routine Inspection  Response to Complaint  Facility has closed or Facility Information has changed

NAME OF FACILITY: ACE, Inc / Quikset SITE ADDRESS: 1901 Esabel

CONTACT NAME: ERIC WILSON PHONE: \_\_\_\_\_ BUSINESS TYPE/ACTIVITY: \_\_\_\_\_ PAGE 2 OF 2

The 250 gal single walled diesel tank now stored without secondary containment is now stored 15 feet away from the drop inlet. Sheen noted from diesel residue noted flowing into the di. Two 55 gal drums with hand pumps also stored in this area on bare soil. Need to store on cement pad covered preferably within secondary containment.

Free product large amount still noted in form oil open secondary containment area. The April 1 response letter mentions that you plan to cover with ply board both secondary containment areas. I recommend checking with Alameda County Fire Department for any concerns/requirements to have prior to implementation. Check with Jim Ferdinand at (925) 833-6609 or Ed Landani regarding this matter.

In empty core green drum storage area: All empties are now stored upside down. Some oil water emulsion noted apparently has leaked from one or more of these drums. Need to tighten bung plugs prior to inverting or rethink this <sup>improved</sup> storage area. Need to clean up

Still has at least (5) 55 gal garbage cans noted stored outside uncovered. Need to cover / store under cover.

I appreciate your efforts to date. Please respond to each of the above <sup>noted</sup> issues noted in writing outlining your intentions for resolution. Also specify timelines for the completion of all issues noted above and in ~~the~~ your April 1, 1999 response letter particularly improved <sup>waste</sup> haz mat/storage and containment tank for contaminated blow down water.

SUBMITTED BY: Paul M. Smith REVIEWED BY: Eric Wilson DATE: 4/5/99



Alameda Countywide  
Clean Water Program  
Standard Stormwater Facility Inspection Report Form

Municipality: Livermore, unincorporated 94550  
Date: 3/5/99

Reason for Inspection:  First Inspection  Routine Inspection  Response to Complaint  Facility has closed or Facility Information has changed

NAME OF FACILITY: Associated Concrete Products Division <sup>The Quickset</sup> organization SITE ADDRESS: 1901 Isabel

CONTACT NAME: Eric Waisanen PHONE: 925 426-1100 BUSINESS TYPE/ACTIVITY: fabrication vaults SIC: 3272

Is the property owner different than the facility owner?  yes  no If yes, complete the following:  
NAME: RMC Lonestar PHONE: \_\_\_\_\_  
MAILING ADDRESS: \_\_\_\_\_

Is the facility covered under any other programs or permits? (Check all that apply)  None  Sanitary sewer  
 Air quality  Hazmat business plan  Underground storage tanks  Aboveground storage tanks  
 Fire department (hazmat storage)  Hazmat waste generator  Other \_\_\_\_\_

Is the facility covered under a storm water permit?  Does not need Coverage  No, but may need to be (Refer to Regional Board)  
 Individual  General: Does the facility have a SWPPP?  yes  no

N/A = Not Applicable; PTNL = POTENTIAL for Pollutant Discharge: 1 = low potential, 2 = medium potential, 3 = high potential  
ACTUAL Type of Discharge: BMP: 0 = BMPs are effective, 1 = BMPs are fairly/almost effective, 2 = BMPs are not effective, 3 = No BMPs are implemented  
PEX = Pollutant Exposure, NSW = Non-Stormwater Discharge

AREAS OF ACTIVITY	N/A	PTNL	ACTUAL Type of Discharge			REMARKS: Describe recommendations, requirements, and time to implement. Check box if remark is a requirement.
			BMP	PEX	NSW	
A. Outdoor Process/Manufacturing Areas		2	1			<input type="checkbox"/> <del>Some</del> Some vaults are fabricated outside uncovered on bare dirt.
B. Outdoor Material Storage Areas		2	2			<input type="checkbox"/> Forms, hazardous materials, equipment stored outside uncovered on bare dirt. where secondary containment
C. Outdoor Waste Storage/Disposal Areas		3	2	X	X	<input type="checkbox"/> exists if it is exposed to runoff runoff from rain. Some hazardous waste buckets uncovered noted stored in front
D. Outdoor Vehicle and Heavy Equipment Storage, Maintenance Areas		2	2			<input type="checkbox"/> secondary contained storage area. Spillage noted inside several secondary containment area. Hydraulic leak to soil
E. Outdoor Parking Areas and Access Roads		2	1			<input type="checkbox"/> below mobile crane and beneath pump outside plant on west side for form oil. rarely
F. Outdoor Wash Areas		2	2			<input type="checkbox"/> This pressure washer reportedly not used any more. No vehicle/equipment pressure washing should
G. Rooftop Equipment	X					<input type="checkbox"/> be directed or allowed to flow offsite Has dead sump - periodically maintained.
H. Outdoor Drainage from Indoor Areas		3	3	X	X	<input type="checkbox"/> Boilers use Tanco #20 scale + corrosion inhibitor and salt pellets. Spent boiler water is flushed out
I. Other (describe):	X					<input type="checkbox"/> into holding lagoon on south of property.

ADDITIONAL COMMENTS/REMARKS: Initial site inspection to evaluate the potential for activities associated with this vault fabrication, cement mixing plant to impact stormwater which reportedly flows from this site into one of two containment lagoons owned & maintained by RMC Lonestar. There are several housekeeping issues noted which need to be addressed to minimize pollutants from running offsite. All hazardous materials and some hazardous waste vessels  See attached for more comments.

FIRST Follow-up Inspection (Date & Findings): 4/5/99 SECOND Follow-up Inspection (Date & Findings): \_\_\_\_\_

PRIORITY FOR RE-INSPECTION:  1; First  2; Second  3; Third  
ENFORCEMENT:  None  Verbal Notice  Administrative Action  Administrative Action w/ Penalty &/or Cost Recovery  Legal Action  
 Warning Notice

Facility Representative Signature: Eric Waisanen Date: 3/5/99  
Print Name of Facility Representative: Eric Waisanen Inspector's Signature: Paul M. [Signature]



Alameda Countywide  
Clean Water Program  
Standard Stormwater Facility Inspection Report Form

Municipality: Livermore

Reason for Inspection:  First Inspection     Routine Inspection     Response to Complaint     Facility has closed or Facility Information has changed

NAME OF FACILITY: ACP / Orincoet    SITE ADDRESS: \_\_\_\_\_

CONTACT NAME: \_\_\_\_\_    PHONE: \_\_\_\_\_    BUSINESS TYPE/ACTIVITY: \_\_\_\_\_    PAGE 2 OF 4

are currently stored outside <sup>uncovered</sup> exposed to rain fall. There were 3 secondary contained areas noted:

In the new bulk oil storage area at the entrance to the plant (4) 5 gal buckets uncovered or partially covered were stored outside or partially outside on containment <sup>edge</sup> on bare dirt. Need to store covered, within secondary containment. Contamination noted floating on liquid within secondary containment. Need to clean up/pump off contamination noted in this area. Leakage noted from <sup>250</sup> ~~500~~ gal diesel <sup>hose to</sup> tank within this containment area. Need to repair ASAP.

The secondary containment was 6" and likely would not hold 110% of the capacity of the largest vessel stored within.

Issues pertaining to all secondary containment areas observed:  
None are covered to prevent rainwater runoff/runoff. I strongly recommend either storing all hazardous materials/waste ~~is~~ covered, under cover, in paved concrete pads within secondary containment

The secondary containment berms (2) for bulk form oil contain contaminated rainwater. Currently this bulk delivery system is not in use. Need to either discontinue/<sup>remove</sup> or prevent runoff. It was unclear whether the integrity of each containment area would prevent seepage/leaks below from occurring.

Current storage of form oil is in 55 gal drums stored on bare soil new & empty. All drums noted capped off. Spillage/soil contamination noted localized below pump. Need to clean up - manage contaminated soil appropriately

SUBMITTED BY Paul M. [Signature]    REVIEWED BY Eric Waisanen    DATE 3/5/99





Alameda Countywide  
Clean Water Program  
Standard Stormwater Facility Inspection Report Form

Municipality: \_\_\_\_\_

Reason for Inspection: <input type="checkbox"/> First Inspection <input type="checkbox"/> Routine Inspection <input type="checkbox"/> Response to Complaint <input type="checkbox"/> Facility has closed or Facility Information has changed	
NAME OF FACILITY ACP/Quinset	SITE ADDRESS
CONTACT NAME	PHONE
BUSINESS TYPE/ACTIVITY	PAGE <u>3</u> OF <u>4</u>

Secondary containment in conduit finishing area also uncovered some contaminated residue noted, not sure if solidified or leachable.

many empty drums stored around the plant on bare soil, some uncovered. Need to store all drums ~~as~~ empty or either upside down or covered. Need to store all liquid drums on cement pads, preferably within secondary containment, covered or under cover to prevent runoff from rainfall.

Contamination to bare soil/cement noted below mobile crane - need to clean up all leaks/spills as soon as they are noted. Reportedly has absorbent. You can also use rags, dust pan/squeegee not hose down. Pick up applied absorbent after applying it.

Conspicuous purple residue at drain to lagoon noted outside the boiler treatment area on the ~~west~~ east side of the plant. Boiler treat contains Tanco corrosion scale remover and pellet salt, NaCl. I informed this facility that the law specifically prohibits any non stormwater discharges from being directed or allowed to flow into stormwater. It was unclear what constituents were in Tanco #70 or whether filtration/toxicity would occur in the lagoon. you are required to: either eliminate this discharge, install a treatment unit to eliminate this discharge or capture - remove/manage this waste appropriately.

Form oil staining noted to soil outside <sup>vault</sup> fabrication area to the east of plant outside. I strongly recommend conducting all fabrication work on cement <sup>pad</sup> in

SUBMITTED BY Paul M. Arne REVIEWED BY Eric Wasserman DATE 3/5/99



Alameda Countywide  
Clean Water Program  
Standard Stormwater Facility Inspection Report Form

Municipality: \_\_\_\_\_

Reason for Inspection:  First Inspection  Routine Inspection  Response to Complaint  Facility has closed or Facility Information has changed

NAME OF FACILITY: ACP / Quikset SITE ADDRESS: \_\_\_\_\_

CONTACT NAME: \_\_\_\_\_ PHONE: \_\_\_\_\_ BUSINESS TYPE/ACTIVITY: \_\_\_\_\_ PAGE 4 OF 4

Conjunction with cleanup of all spills as soon as they are noted.

Perform ~~best~~ clean up in storage, spill areas within 7 days by 3/12/99.  
Provide a written response outlining your intentions regarding ~~the~~ issues noted in this report. by 4/5/99

I informed this facility that because they fall under Standard Industrial Code 3272 Concrete products, except Block & Brick Not Elsewhere classified that they fall under the mandatory classification as a General Industrial Activities Permitted facility. There are exemptions to a General Permit if there is no runoff from this site i.e. lagoon. However, if pollutants are allowed to flow off site I will recommend to the Regional water Quality Control Board that this facility be required to apply for and adhere to all conditions of a general permit including:

- ① completion of a notice of intent w/ fees to SWRCB
- ② Preparation of Stormwater Pollution Prevention Plan
- ③ " " Monitoring Plan
- ④ Conduct monitoring of runoff twice / wet season monitor monthly during dry season
- ⑤ Annual Report

Base BMP Industrial + Commercial, Urban Runoff is Everybody's Business  
Supp + Monitoring Plan Guidelines

SUBMITTED BY Paul M. Arim

REVIEWED BY Eric Wasserman DATE \_\_\_\_\_

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

StID 3200

July 19, 1993

Mr. Sumadhu Arigala  
S.F. Bay RWQCB  
2101 Webster St., Suite 500  
Oakland, CA 94612

**Subject: Site Closure for Associated Concrete, 1901 Isabel Ave.,  
Livermore, CA 94550**

Dear Mr. Arigala:

This office has completed review of the case file for the above referenced site to determine if the site is ready for case closure.

In March 1991, two double-walled USTs (one diesel, one gasoline) were removed from the referenced site. Soil samples taken from native soils beneath the tanks exhibited up to 2.9 ppm TPH-G and did not detect any TPH-D or BTEX. However, rain water had entered the pit before the tank removal procedure was completed. A water sample analyzed showed elevated levels of gas and diesel fuel products. The analytical results from the stockpiled soil exhibited up to 2,000 ppm TPH-D.

A preliminary site assessment commenced in June 1991 with the advancement of three soil borings to a depth of 25-28 feet within the former UST pit to a depth ranging from 15-28 feet. Laboratory analyses of soil samples taken from the soil borings did not detect TPH-G, TPH-D, or BTEX above the MDL.

Sixty cubic yards of excavated soil, split into two piles, were bioremediated on site. The smaller pile, approximately 20 cubic yards, was later used onsite for road grading after laboratory analysis showed the soil did not contain any diesel contamination. The other 40+ cubic yards was later hauled to Vasco Landfill for disposal.

Because active groundwater pumping occurs at the nearby Lonestar Gravel Pits, groundwater flow direction at this site appears to be toward the north and northwest. Depth to groundwater is approximately 100 feet below ground surface.

From my review of the data presented, it appears that most of the fuel contaminated soil was removed from the former UST pit at the time of the tank removal. There is at least 50 feet of soil separating the groundwater table and the last detected hydrocarbons in soil, therefore, the installation of a groundwater monitoring well was not required.

Mr. Sumadhu Arigala - RWQCB  
re: Case Closure for 1901 Isabel, Livermore  
July 19, 1993

Page 2

It is my opinion that this case should be reviewed by the RWQCB for case closure. Please contact me at (510) 271-4530 should you need a copy of any reports pertaining to this site, or if you need additional information.

Sincerely,

eva chu  
Hazardous Materials Specialist

cc: Nick DeFeo, Associated Concrete Products, 1901 Isabel Ave.,  
Livermore, CA 94550  
Danielle Stefani, Livermore Fire Department  
Bradd Stately, RMC Lonestar, 4750 Norris Canyon Rd.,  
San Ramon, CA 94583  
files

associat