



2030 Addison Street, Suite 500 • Berkeley, California 94704 • 415 540-6954

August 30, 1991

Mr. Cecil Felix  
Engineering Geologist  
San Francisco Bay Regional Water Quality Control Board  
1800 Harrison Street, Suite 700  
Oakland, CA 94612

*talk to marks over telephone on 9/5  
WR will not accept the waiver of WDR  
• the 250 mg benzene in the soil - a potential carcinogen  
• NO info about the baseline soil info at new site (discrete samples required)  
• the soil stockpile is not properly characterized (hazardous waste)  
• NO info about the transfer of the hazardous waste is acceptable to the local agencies and the health dept.*

*4933  
Only way to do is either  
• take it to an appropriate landfill site  
• apply for WDR proper.*

90239.3

Dear Mr Felix:

This letter represents a request by Aqua Resources Inc.(ARI) on behalf of Ransome Company for a waiver of the Waste Discharge Permit requirement in order to relocate non-hazardous soil contaminated with Petroleum Hydrocarbons. Ransome Co. would like to relocate approximately 2,000 cy of soil which is contaminated primarily with diesel and oil and grease. Detailed results of lab analyses representing three composites of four samples each taken from a stockpile of these soils are attached. In summary the soil contains average hydrocarbon concentrations of 11.5 ppm<sub>w</sub> gasoline, 77 ppm<sub>w</sub> diesel and 917 ppm<sub>w</sub> oil and grease.

This soil was excavated as part of ARI's environmental cleanup operation at Ransome's former construction yard at 4030 Hollis St. in Emeryville, CA. The cleanup is being performed as part of a contractual agreement between Ransome, who occupied the site for over 40 years, and Catellus Company who owns the property and plans to redevelop it. About one year ago Ransome relocated its operations to 740 Julie Ann Way, Oakland. Catellus has set a deadline of October 1, 1991 for completion of the cleanup and remediation project. The site must be left vacant by that date. In order to meet this deadline Ransome Co. wants to relocate the soil to their present location until such time as it can be remediated or a permanent disposal site can be found.

Relocation of the soil will involve loading the soil onto trucks and transporting it approximately 5 miles to their property in Oakland. At the new site the contaminated soil

**46C**

would be placed over and covered by a plastic liner to prevent any possible infiltration and subsequent runoff of rainwater.

If you have any questions please do not hesitate to contact me at (415) 540-6954.

Sincerely,

AQUA RESOURCES INC

*Wojciech Bay*  
*for*

Mark Milani, P.E.  
Project Manager

MM/as

Enclosures

90239.3/WDPwaivr.let

LABORATORY NUMBER: 104631  
 CLIENT: AQUA RESOURCES  
 PROJECT ID: 90239.3  
 LOCATION: RANSOME

DATE RECEIVED: 07/26/91  
 DATE ANALYZED: 07/30/91  
 DATE REPORTED: 08/02/91

Total Volatile Hydrocarbons with BTXE in Soils and Wastes  
 TVH by California DOHS Method/LUFT Manual October 1989  
 BTXE by EPA 5030/8020

LAB ID	SAMPLE ID	TVH AS GASOLINE (mg/Kg)	BENZENE (ug/Kg)	TOLUENE (ug/Kg)	ETHYL BENZENE (ug/Kg)	TOTAL XYLENES (ug/Kg)
104631-11	<u>SP-J1-1,2,3,4</u>	23	250	11	33	460

ND = Not detected at or above reporting limit; Reporting limit indicated in parentheses.

QA/QC SUMMARY

RPD, %	5
RECOVERY, %	102

LABORATORY NUMBER: 104631  
 CLIENT: AQUA RESOURCES  
 PROJECT ID: 90239.3  
 LOCATION: RANSOME

DATE RECEIVED: 07/26/91  
 DATE EXTRACTED: 07/29/91  
 DATE ANALYZED: 08/01-02/91  
 DATE REPORTED: 08/02/91

Extractable Petroleum Hydrocarbons in Soils & Wastes  
 California DOHS Method  
 LUFT Manual October 1989

LAB ID	SAMPLE ID	KEROSENE RANGE (mg / Kg)	DIESEL RANGE (mg / Kg)	REPORTING LIMIT* (mg / Kg)
104631-11	SP-J1-1,2,3,4	ND	98	1.0

ND = Not Detected at or above reporting limit.

\*Reporting limit applies to all analytes.

QA/QC SUMMARY

=====  
 RPD, % 18  
 RECOVERY, % 117  
 =====

Client: Aqua Resources

Laboratory Login Number: 104631

 Project Name: Ransome  
 Project Number: 90239.3

Report Date: 05 August 91

ANALYSIS: Hydrocarbon Oil &amp; Grease (Gravimetric)      METHOD: SMWW 17:5520EF

Lab ID	Sample ID	Matrix	Sampled	Received	Analyzed	Result	Units	RL	Analyst	QC Batch
104631-011	SP-J1-1,2,3,4	Soil	26-JUL-91	26-JUL-91	31-JUL-91	2000	mg/Kg	50	TR	2193

ND = Not Detected at or above Reporting Limit (RL).

## Q C B a t c h R e p o r t

Client: Aqua Resources  
 Project Name: Ransome  
 Project Number: 90239.3

Laboratory Login Number: 104631  
 Report Date: 02 August 91

ANALYSIS: Hydrocarbon Oil & Grease (Gravimetric)

QC Batch Number: 2193

## Blank Results

Sample ID	Result	MDL	Units	Method	Date Analyzed
BLANK	ND	50	mg/Kg	SMWW 17:5520EF	31-JUL-91

## Spike/Duplicate Results

Sample ID	Recovery	Method	Date Analyzed
BS	91%	SMWW 17:5520EF	31-JUL-91
BSD	89%	SMWW 17:5520EF	31-JUL-91

		Control Limits
Average Spike Recovery	90%	80% - 120%
Relative Percent Difference	2.6%	< 20%

# AQUA RESOURCES, INC.



## CHAIN OF CUSTODY RECORD

SHIPMENT NO.: 31  
 PAGE 1 OF 1  
 DATE 7/26/91

PROJECT NAME: RANSOME  
 PROJECT NO.: 90239.3

Sample Number	Location (Depth - ft)	Type of Sample		Type of Container	Type of Preservation		Analysis Required
		Material	Method		Temp	Chemical	
SP-TI-1	4 1/2	Soil	Drive	Brass Tube	±4°C		COMPOSITE AND RUN IF <del>TPH</del> 1, 2, 3
SP-TI-2	3	"	"	"	"		
SP-TI-3	6 1/2	"	"	"	"		
SP-TI-4	2 1/2	"	"	"	"		
TP-J-1	9 1/2	"	"	"	"		1
TP-J-2	5 1/2	"	"	"	"		1
TP-J-3	6 1/2	"	"	"	"		1, 2, 3
DE-45*	5	"	"	"	"		1, 2
DB-46	10 1/2	"	"	"	"		1
DS-47	6	"	"	"	"		

Total Number of Samples Shipped: 10 Sampler's Signature: [Signature]

Relinquished By: Signature: <u>[Signature]</u> Printed Name: <u>Aaron D. Stessman</u> Company: <u>Aqua Resources</u> Reason: <u>For Analysis</u>	Received By: Signature: <u>[Signature]</u> Printed Name: <u>Laurinda Brewer</u> Company: <u>CT - Berkeley</u>	Date: <u>7/26/91</u> Time: _____
Relinquished By: Signature: _____ Printed Name: _____ Company: _____ Reason: _____	Received By: Signature: _____ Printed Name: _____ Company: _____	Date: <u>1/1</u> Time: _____

REMARKS:

- ① = TVHG + BTEX
- ② = TPHD
- ③ = O&G
- ④ = TVHG only
- \* = 43 hr. Resist

5 day turnaround  
on all samples

Special Shipment / Handling / Storage Requirements:



Curtis & Tompkins, Ltd., Analytical Laboratories, Since 1878

2323 Fifth Street, Berkeley, CA 94710, Phone (415) 486-0900

DATE RECEIVED: 08/07/91

DATE REPORTED: 08/20/91

LABORATORY NUMBER: 104747

AQUA RESOURCES, INC  
RECEIVED

AUG 23 1991


CLIENT: AQUA RESOURCES, INC.

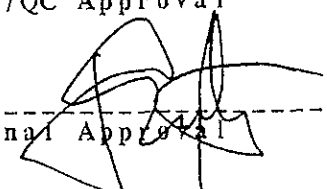
JOB NO. \_\_\_\_\_  
FILE \_\_\_\_\_

PROJECT ID: 90239.3

LOCATION: RANSOME

RESULTS: SEE ATTACHED

  
-----  
QA/QC Approval

  
-----  
Final Approval

Berkeley

Wilmington

Los Angeles



Client: Aqua Resources

Laboratory Login Number: 104747

 Project Name: Ransome  
 Project Number: 90239.3

Report Date: 20 August 91

ANALYSIS: Hydrocarbon Oil &amp; Grease (Gravimetric)      METHOD: SMWW 17:5520EF

Lab ID	Sample ID	Matrix	Sampled	Received	Analyzed	Result	Units	RL	Analyst	QC Batch
104747-009	SP-J1-5,6,7,8	Soil	07-AUG-91	07-AUG-91	09-AUG-91	440	mg/Kg	50	TR	2294
104747-010	SP-J1-9,10,11,12	Soil	07-AUG-91	07-AUG-91	09-AUG-91	310	mg/Kg	50	TR	2294

ND = Not Detected at or above Reporting Limit (RL).

## Q C B a t c h R e p o r t

Client: Aqua Resources  
 Project Name: Ransome  
 Project Number: 90239.3

Laboratory Login Number: 104747  
 Report Date: 20 August 91

ANALYSIS: Hydrocarbon Oil & Grease (Gravimetric)

QC Batch Number: 2294

## Blank Results

Sample ID	Result	MDL	Units	Method	Date Analyzed
BLANK	ND	50	mg/Kg	SMWW 17:5520EF	09-AUG-91

## Spike/Duplicate Results

Sample ID	Recovery	Method	Date Analyzed
BS	81%	SMWW 17:5520EF	09-AUG-91
BSD	85%	SMWW 17:5520EF	09-AUG-91

		Control Limits
Average Spike Recovery	83%	80% - 120%
Relative Percent Difference	4.6%	< 20%

LABORATORY NUMBER: 104747  
 CLIENT: AQUA RESOURCES, INC.  
 PROJECT ID: 90239.3  
 LOCATION: RANSOME

DATE RECEIVED: 08/07/91  
 DATE ANALYZED: 08/10,13/91  
 DATE REPORTED: 08/20/91

Total Volatile Hydrocarbons with BTXE in Soils and Wastes  
 TVH by California DOHS Method/LUFT Manual October 1989  
 BTXE by EPA 5030/8020

LAB ID	SAMPLE ID	TVH AS GASOLINE (mg/Kg)	BENZENE (ug/Kg)	TOLUENE (ug/Kg)	ETHYL BENZENE (ug/Kg)	TOTAL XYLENES (ug/Kg)
104747-9	SP-J1-5,6,7,8	6.2	ND(5.0)	ND(5.0)	19	120
104747-10	SPJ1-9,10,11,12	5.2	ND(5.0)	ND(5.0)	16	97

ND = Not detected at or above reporting limit; Reporting limit  
 indicated in parentheses.

QA/QC SUMMARY

RPD, %	3
RECOVERY, %	101

LABORATORY NUMBER: 104747  
 CLIENT: AQUA RESOURCES, INC.  
 PROJECT ID: 90239.3  
 LOCATION: RANSOME

DATE RECEIVED: 08/07/91  
 DATE EXTRACTED: 08/08/91  
 DATE ANALYZED: 08/09,17/91  
 DATE REPORTED: 08/20/91

Extractable Petroleum Hydrocarbons in Soils & Wastes  
 California DOHS Method  
 LUFT Manual October 1989

LAB ID	SAMPLE ID	KEROSENE RANGE (mg/Kg)	DIESEL RANGE (mg/Kg)	REPORTING LIMIT* (mg/Kg)
104747-9	<del>SP-J1-5,6,7,8</del>	ND	53	10
104747-10	<del>SP-J1-9,10,11,12</del>	ND	79	10

ND = Not Detected at or above reporting limit.

\*Reporting limit applies to all analytes.

QA/QC SUMMARY

RPD, %	<1
RECOVERY, %	81

AQUA RESOURCES, INC.

SHIPMENT NO.: 44



CHAIN OF CUSTODY RECORD

PAGE 1 OF 1

DATE 8/14/91

PROJECT NAME: RANSOME

PROJECT NO.: 90239.3

104838 = mud

Sample Number	Location (DEPTH)	Type of Sample		Type of Container	Type of Preservation		Analysis Required
		Material	Method		Temp	Chemical	
JS-63 1	8'	Soil	Drive	Brass Tube	4°C		1, 2, 3
JS-64 1	7 1/2'	"	"	"	"		1*
TB-65 2	13'	"	"	"	"		1*
JS-66 2	8'	"	"	"	"		1, 2, 3
TB-67 3	13'	"	"	"	"		1*
JS-68 3	9'	"	"	"	"		

Total Number of Samples Shipped: 6      Sampler's Signature: *Sam M. Stessman*

Relinquished By: Signature: <i>Sam M. Stessman</i> Printed Name: Aaron K. Stessman Company: Aqua Resources Reason: For Analysis	Received By: Signature: <i>Mary Wilson</i> Printed Name: Mary Wilson Company: C-1 Lab	Date: 8/14/91 Time: 4:50
Relinquished By: Signature: _____ Printed Name: _____ Company: _____ Reason: _____	Received By: Signature: _____ Printed Name: _____ Company: _____	Date: _____ Time: _____

REMARKS:

① = TVH + BTEX  
 ② = TEHD  
 ③ = O&G  
 \* = AB hr rush others 5 day

Special Equipment / Handling / Storage Requirements: