

**Wickham, Jerry, Env. Health**

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To: Wickham, Jerry, Env. Health  
Subject: RE: RO92 - 7825 San Leandro Street, Oakland

In response to item below, I spoke with Cesar Qutevis, City of Oakland Planner on 2/1/2007. He could not find information on Geotracker and had called Cherie at Water Board. He is working on a creek restoration project that will involve realigning creek bank, some dredging, and something with a box culvert. The site at 7825 San Leandro is adjacent to creek and on the Cortese list so they cannot get a categorical exemption from CEQA. I indicated that our fuel leak case involved point source subsurface contamination in other areas of the site. I indicated that any effects from creek restoration on our work or vice versa would be extremely unlikely.

Jerry Wickham  
-----Original Message-----  
From: Drogos, Donna, Env. Health  
Sent: Thursday, February 01, 2007 4:02 PM  
To: Wickham, Jerry, Env. Health  
Cc: Cherie McCaulou  
Subject: RO92 - 7825 San Leandro Street, Oakland

Hi Jerry, Can you call the person below & answer his questions about the site? Thanks, Donna

Cesar Quitevis, Planner, City of Oakland  
238-6343

-----Original Message-----  
From: Cherie McCaulou [mailto:CMccaulou@waterboards.ca.gov]  
Sent: Thursday, February 01, 2007 3:46 PM  
To: Drogos, Donna, Env. Health  
Cc: Mary Rose Cassa; Nancy Katyl  
Subject: 7825 San Leandro Street, Oakland

Donna - do you have any info. on this site (SLIC) called American Brass and Iron. It's in Geotracker, but has no info? Perhaps its an "inactive SLIC case" here at the Board. I'm responding to a Planner with the City of Oakland doing a creek restoration project. Apparently this site is on Cortese list, along with 2 others (8255 and 8611 San Leandro). Thanks.

Sincerely,

Cherie McCaulou  
Engineering Geologist  
San Francisco Bay Regional Water Quality Control Board cmccaulou@waterboards.ca.gov  
510-622-2342

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



7

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

September 14, 2006

Mr. Mike Olvera  
AB&I Foundry  
7825 San Leandro Street  
Oakland, CA 94621-2598

Subject: Fuel Leak Case No. RO0000092, American Brass & Iron Foundry, 7825 San Leandro Street, Oakland, CA

Dear Mr. Olvera:

I am the caseworker assigned to your case. Please send future correspondence regarding this case to my attention. Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site. The most recent document submitted for the site is a response to comments and request for site closure in correspondence from AB&I Foundry dated November 21, 2001. ACEH responded to the November 21, 2001 correspondence in an electronic mail message that outlined technical observations on the responses presented. No more recent reports or correspondence are contained in our files. The fuel leak case for this site remains open.

The purpose of this correspondence is to provide a more formal response to the November 21, 2001 request for site closure and to request additional work at the site in order to allow the case to proceed towards closure. Based on the issues discussed in the technical comments below, the case cannot be closed at this time. This decision is subject to appeal to the State Water Resources Control Board (SWRCB), pursuant to Section 25299.39(b) of the Health and Safety Code (Thompson-Richter Underground Storage Tank Reform Act - Senate Bill 562). Please contact the SWRCB Underground Storage Tank Program at (916) 341-5851 for information regarding the appeal process.

We request that you submit a Work Plan by **November 30, 2006** to address the technical comments below.

**TECHNICAL COMMENTS**

1. **Extent of Soil and Groundwater Contamination for Former 550-gallon Gasoline UST.**  
The extent of soil and groundwater contamination has not been fully defined in the area of the former 550-gallon gasoline UST. The tank removal report for the 550-gallon UST (Levine Fricke January 31, 1992) indicated that contaminated soils were left in place on the south and west walls of the excavation and below the former UST because the excavation could not be extended further due to the presence of nearby structures. In addition, no soil samples were collected or excavation performed in the area of the former gasoline dispenser. Please present plans in the Work Plan requested below to define the lateral and vertical extent of petroleum hydrocarbons in this area.

2. **Extent of Soil and Groundwater Contamination for Former 1,1,1-Trichloroethane UST.** The extent of soil and groundwater contamination has not been fully defined in the area of the former 1,1,1-TCA UST. The tank removal report for the 1,1,1-TCA UST (AB&I April 4, 1992) indicated that contaminated soils were left in place due to the difficulty in removing a concrete surface structure. Odor, sheen, and discolored soils were observed in the MW-2 soil boring, which is adjacent to the former 1,1,1-TCA UST from 10.5 to 12 feet bgs. Please present plans in the Work Plan requested below to define the lateral and vertical extent of contamination in this area.
3. **Elevated Concentrations of Lead Detected in Groundwater.** Lead was detected in groundwater during two sampling events for well MW-4 at concentrations up to 86 micrograms per liter ( $\mu\text{g/L}$ ). The applicable aquatic habitat water quality goal for lead in groundwater is 2.5  $\mu\text{g/L}$ . Please present plans in the Work Plan requested below to evaluate these detections of elevated concentrations of lead.
4. **Sampling Monitoring Wells.** The most recent groundwater sampling data in our files are from April 1996. Please present plans in the Work Plan requested below to sample the existing groundwater monitoring wells at the site. Please note that laboratory analyses for fuel oxygenates and lead scavengers is required; however, no analyses for these constituents appear to have been conducted to date.
5. **Hydraulic Gradient.** The regional hydraulic gradient in the area of the site is to the southwest, towards San Francisco Bay. In the Work Plan requested below, please discuss potential reasons that the observed hydraulic gradient based on the four monitoring wells at the site has frequently been to northeast or northwest.

#### **TECHNICAL REPORT REQUEST**

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

- **November 30, 2006 – Work Plan**

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

#### **ELECTRONIC SUBMITTAL OF REPORTS**

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please be sure that you have claimed your site on the SWWRCB Geotracker website (Global ID T0600100065). Visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

#### PERJURY STATEMENT

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

#### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

#### UNDERGROUND STORAGE TANK CLEANUP FUND

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

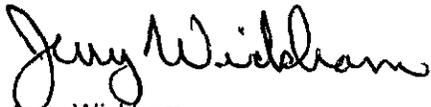
Mr. Mike Olvera  
September 14, 2006  
Page 4

**AGENCY OVERSIGHT**

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

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Sunil Ramdass  
SWRCB Cleanup Fund  
1001 I Street, 17<sup>th</sup> Floor  
Sacramento, CA 95814-2828

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

ST. 123 / R072



Foundry/Corporate Office

Los Angeles Service Center

Enameling Division

7825 San Leandro Street  
Oakland, CA 94621-2598  
510/632-3467  
510/632-8035 Fax

15006 Nelson Avenue  
City of Industry, CA 91744-4331  
626/333-4882  
626/333-8681 Fax

2581 South Golden State Blvd.  
Fowler, CA 93625-9750  
559/834-4630  
559/834-3431 Fax

November 21, 2001

DEC 17 2001

Alameda County Health Care Services Agency  
Department of Environmental Health  
UST Local Oversight Program  
~~80 Swan Way, Room 200~~  
~~Oakland, CA 94621~~  
Attn: Barney Chan

1181 HARBOR BAY PILEY  
ALAMEDA, CA 94502

Dear Mr. Chan:

This letter is a request for site closure for removed underground tanks at AB&I, and a response to your letter dated August 7, 1997. I have taken over the environmental department and wish to receive closure for this project. This event took place before I arrived at AB&I but after researching our files to locate the missing information, I have gathered the following remarks and enclosed documents.

8000 gal unleaded gasoline tank: (removed 8/8/91)

The receipt for the disposal of the product, invoice #266281.

550 gal unleaded gasoline tank: (removed 8/26/91)

The receipt for the disposal of the product, invoice # 215068.

The manifest for the disposal of the tank, # 90546775.

The down gradient is located in a northwestern direction, so any elevated levels would move toward AB&I.

8000 gal 1,1,1 Trichloroethane tank: (removed 10/4/91)

Samples were tested for chlorinated solvents via Method 8010 and volatiles via a VOC Meter.

The 90% estimate was made by an educated visual inspection for a "worst case" scenario.

Additional soils used to backfill included non-hazardous foundry sand, clay, and possibly slag.



Neither can I locate any results for Semi-volatiles via method 8270 for this tank nor for any agreement to monitor for semi-volatiles.

12000 gal diesel tank: (removed 6/3/92)

The receipt for the disposal of the product, invoice #256763.

The spoils from the tank were biologically treated by Ned Pepper inc and sent to BFI/Aitarront landfill for disposal.

If you have any other concerns or questions, please call me at 510-632-3467 x 224.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Olvera', written in a cursive style.

Mike Olvera  
Environmental Engineer

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



August 7, 1997  
StID # 523

Mr. Dave Robinson  
AB&I  
7825 San Leandro St.  
Oakland CA 94621

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

**Re: Request for Technical Information for the Closure of Former  
Underground Tanks at AB&I, 7825 San Leandro St., Oakland  
94621**

Dear Mr. Robinson:

In response to your request for site closure, our office has been reviewing the historical data in our files in regards to the removal of the four underground tanks at the above site. A number of questions arose from my review which will need further clarification. At this point, you should suspend any further groundwater monitoring unless it is required as essential information for recommendation for site closure.

Please provide a written response to each of the following items so I may proceed with site closure preparation. I will separate my questions/comments as they relate to each underground tank removal.

1. 8000 gallon unleaded gasoline tank, removed 8/8/91

✓ \* The October 15, 1991 Levine Fricke report says that the residual gasoline in this tank was removed from the site by Evergreen Vacuum Services of Newark. Please provide a copy of the receipt for the disposal of this residual product.

2. 550 gallon unleaded gasoline tank, removed 8/26/91

✓ \* The residual gasoline from this tank was removed by Evergreen Vacuum Services on August 23, 1991. Please provide a copy of the receipt for the disposal of this product.

✓ \* Please provide a copy of the manifest for the disposal of this tank.

\* The monitoring well next to this former tank, MW-4, detected elevated TPHg (2100ppm) and BTEX (6.6,4.1,7.0 and 17 ppm) in the boring from 14.5'. It, therefore, appears that the extent of soil contamination has not been adequately defined as required by the RWQCB's letter regarding "low risk" soil and groundwater cases. How can residual risk via ASTM RBCA be evaluated without adequate soil characterization?



Mr. Dave Robinson  
StID # 523, AB&I  
7825 San Leandro St.  
August 7, 1997  
Page 2.

3. 8000 gallon 1,1,1-trichloroethane tank, removed 10/4/91

\* The approximately 180 cubic yards of soils generated from this tank removal was aerated prior to sampling. Only two samples, SPT3A and SPT3B were analyzed for chlorinated solvents via method 8010. More than two samples should have been sampled and the samples should have been tested for all potential contaminants ie TPHg, TPHd, BTEX, TOG and semi-volatiles. Recall the presence of the tarry substance which contained oil and grease and possibly PAHs. Considerable TPHg and BTEX was detected in the grab groundwater sample from this excavation.

\* On page 9 of your April 8, 1992 report, you stated that the excavation process had removed 90% of the contaminated tarry layer. How did you make this estimate?

\* In your 5/25/94 table, which summarizes the amount of soil excavated from each tank pull plus its final backfill location, it is noted that the remediated soils from the 550 gallon gasoline tank was used as backfill for the solvent tank pit. This soil, 40-60cy, accounts for only partially accounts for the amount of soil necessary to backfill this 8000 gallon tank pit. What additional soils were used backfill the solvent tank pit?

\* The 10.5' soil sample from MW-2, the well adjacent to the tank pit, exhibited 63 ppm TPHg, 140ppm TPHd and 3500 ppm oil and grease. Shouldn't the extent of this contamination be defined? Is the source of this oil and grease from the shallow tarry material? If not, what is its likely source?

\* It appears that, although you agreed to monitor MW-2 for semi-volatiles via Method 8270, it was never done. Please check to see if this analysis was ever performed. This must be done prior to site closure. Friedman and Bruya's analysis of the tarry material never analyzed for PAHs which they say are typically found in asphalt.

4. 12,000 gallon diesel tank, removed on 6/3/92.

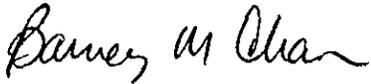
✓ \* Please provide a copy of the receipt for the disposal of fuel sent to California Oil Recyclers.

\* The spoils from this tank pull were biologically treated and sent to a landfill for disposal. Please provide documentation for the disposition of this soil.

Mr. Dave Robinson  
StID # 523, AB&I  
7825 San Leandro St.  
August 7, 1997  
Page 3.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

c: B. Chan, files  
questABI

STATE WATER RESOURCES CONTROL BOARD  
 DIVISION OF CLEAN WATER PROGRAMS  
 2014 T STREET, SUITE 130  
 P.O. BOX 944212  
 SACRAMENTO, CALIFORNIA 94244-2120  
 (916)227-4360  
 (916)227-4530 (FAX)



NOV 28 1995

Stid 523  
 (BC)

PO92

November 21, 1995

AMERICAN BRASS & IRON FOUNDRY  
 7825 SAN LEANDRO ST  
 OAKLAND, CA 94621

UNDERGROUND STORAGE TANK CLEANUP FUND PROGRAM, NOTICE OF PROPOSED  
 WITHDRAWAL OF LETTER OF COMMITMENT: CLAIM NUMBER 004132; FOR SITE ADDRESS:  
 7825 SAN LEANDRO ST, OAKLAND 94621

A Letter of Commitment (LOC) was issued to you on March 24, 1995. Pursuant to its terms and conditions, an LOC may be withdrawn at any time if the claimant is found to be not in compliance with any applicable state rules and regulations, and with all of the terms, conditions, and commitments contained in the claimant's application.

This letter is to notify you that the Underground Storage Tank Cleanup Fund is proposing to withdraw your LOC for the following reason(s):

You were granted an extension to submit a reimbursement request by September 1, 1995. On September 27, 1995, you had not yet submitted a request and you were sent a "No Response to Letter of Commitment" letter. The letter informed you that we had not received a reimbursement request from you and required you to submit a request within 30 days of the date of the letter or steps would be taken to withdraw your LOC. To date, we still have not received a reimbursement request from you.

If you are not in agreement with this decision, you may request a review of the decision by the Manager of the Underground Storage Tank Cleanup Fund Program within thirty (30) calendar days of the date of this Notice. Please send any request for review to:

Mr. Dave Deaner, Manager      Claim No. 004132  
 Underground Storage Tank Cleanup Fund Program  
 State Water Resources Control Board  
 Division of Clean Water Programs  
 P. O. Box 944212  
 Sacramento, CA 94244-2120

If a request for review of this decision is not received within thirty (30) calendar days of the date of this Notice, your LOC will be withdrawn.

If you have any questions, please contact Cheryl Gordon at (916) 227-4539.

Sincerely,

*Francine Aguirre*  
 Francine Aguirre Team Leader - Region 2  
 Underground Storage Tank Cleanup Fund

cc: Mr. Steve Morse  
RWQCB, Region 2  
2101 Webster St., Ste. 500  
Oakland, CA 94612

Mr. Thomas Peacock  
Alameda County EHD  
1131 Harbor Bay Pkway, 2nd Fl.  
Alameda, CA 94502-6577

95 DEC -8 PM 2:18  
AIRBORNE  
PROTECTION  
MONTANA

STATE WATER RESOURCES CONTROL BOARD  
DIVISION OF CLEAN WATER PROGRAMS  
2014 T STREET, SUITE 130  
P.O. BOX 944212  
SACRAMENTO, CALIFORNIA 94244-2120  
(916) 227-4307  
(916) 227-4530 (FAX)

ENVIRONMENTAL  
PROTECTION

95 SEP 29 PM 1:15



*war*

September 27, 1995

AMERICAN BRASS & IRON FOUNDRY  
7825 SAN LEANDRO ST  
OAKLAND, CA 94621

UNDERGROUND STORAGE TANK CLEANUP FUND PROGRAM, NO RESPONSE TO LETTER OF COMMITMENT (LOC): CLAIM NUMBER 004132; FOR SITE ADDRESS: 7825 SAN LEANDRO ST, OAKLAND

It has come to my attention that the LOC issued to you on March 24, 1995 in the amount of \$20,000 has not been responded to with a request for reimbursement.

You requested an extension for submittal of your reimbursement request and was granted an extension for submittal by September 1, 1995. Please submit your reimbursement request with all of the required supporting documentation. If a request is not received within thirty (30) calendar days from the date of this letter, I will take steps to begin the withdrawal process of your LOC.

Please send your reimbursement request or explanation to:

Claim No. 004132  
State Water Resources Control Board  
Division of Clean Water Programs  
Underground Storage Tank Cleanup Fund Program  
P. O. Box 944212  
Sacramento, CA 94244-2120

If you have any questions, please contact Cheryl Gordon at (916) 227-4539.

Sincerely,

*Cheryl Gordon for*  
Francine Aguirre, Team Leader - Region 2  
Underground Storage Tank Cleanup Fund

cc: Mr. Barney Chan  
Alameda County EHD  
1131 Harbor Bay Pkway, 2nd Fl  
Alameda, CA 94502-6577

STATE WATER RESOURCES CONTROL BOARD  
DIVISION OF CLEAN WATER PROGRAMS  
2014 T STREET, SUITE 130  
P.O. BOX 944212  
SACRAMENTO, CALIFORNIA 94244-2120  
(916)227-4360  
(916)227-4530 (FAX)

Stid 523  
(30)

FEB 29 11 31 AM '96  
STATE WATER RESOURCES CONTROL BOARD  
DIVISION OF CLEAN WATER PROGRAMS

FEB 23 1996

DAVE ROBINSON  
AMERICAN BRASS & IRON FOUNDRY  
7825 SAN LEANDRO ST  
OAKLAND, CA 94621

UNDERGROUND STORAGE TANK CLEANUP FUND PROGRAM, NOTICE OF WITHDRAWAL OF LETTER OF COMMITMENT: CLAIM NUMBER 004132; FOR SITE ADDRESS: 7825 SAN LEANDRO ST, OAKLAND 94621

Dear Mr. Robinson:

On November 28, 1995, a "Notice of Proposed Withdrawal of Letter of Commitment" was sent to you. The Notice informed you that your Letter of Commitment (LOC) was to be withdrawn and the reason for that determination. The Notice also informed you that if you did not agree with the determination, you could request a review within thirty (30) calendar days from the date of the Notice.

Since you did not request a review within the time specified, I have determined that your claim is not eligible for participation in the Underground Storage Tank Cleanup Fund and your LOC is hereby withdrawn.

If you have any questions, please contact Cheryl Gordon at (916) 227-4539.

Sincerely,



Dave Deaner, Manager  
Underground Storage Tank Cleanup Fund

cc: Mr. Steve Morse  
RWQCB, Region 2  
2101 Webster St., Ste. 500  
Oakland, CA 94612

Mr. Thomas Peacock  
Alameda County EHD  
1131 Harbor Bay Pkway, 2nd Fl.  
Alameda, CA 94502-6577

STATE WATER RESOURCES CONTROL BOARD  
 DIVISION OF CLEAN WATER PROGRAMS  
 2014 T STREET, SUITE 130  
 P.O. BOX 944212  
 SACRAMENTO, CALIFORNIA 94244-2120  
 (916) 227-4360  
 (916) 227-4530 (FAX)



APR 24 1995

#523

(BC)

Attn: Dave Robinson  
 American Brass and Iron Foundry  
 7825 San Leandro Street  
 Oakland, CA 94621

UNDERGROUND STORAGE TANK CLEANUP FUND, CLAIM NO. 004132, FOR SITE ADDRESS: 7825 San Leandro Street, Oakland, CA 94621

The State Water Resources Control Board (State Board) takes pleasure in issuing the attached Letter of Commitment in an amount not to exceed \$20,000. This Letter of Commitment is based upon our review of the corrective action costs incurred to date and your application received on January 17, 1992 and may be modified by the State Board in writing by an amended Letter of Commitment.

Read the terms and conditions listed in the Letter of Commitment. The State Board will take steps to withdraw this Letter of Commitment after 90 calendar days from the date of this transmittal letter unless you proceed with due diligence with your cleanup effort. This means that you must take positive, concrete steps to ensure that corrective action is proceeding with all due speed. For example, if you have not started your cleanup effort, you must obtain three bids and sign a contract with one of these bidders within 90 calendar days. If your cleanup effort has already started and was delayed, you must resume the expenditure of funds to ensure that your cleanup is proceeding in an expeditious manner. You are reminded that you must comply with all regulatory agency time schedules and requirements.

This package includes the following:

- A "Reimbursement Request Instructions" package. Retain this package for future reimbursement requests. These instructions must be followed when seeking reimbursement for corrective action costs incurred after January 1, 1988. Included in the instruction package are:
  - Samples of completed Reimbursement Request forms and Spreadsheets.
  - Recommended Minimum Invoice Cost Breakdown
- A "Bid Summary-Sheet to list information on bids received.
- A "Certification of Non-Recovery From Other Sources" which must be returned before any reimbursements can be made.
- "Reimbursement Request" forms which you must use to request reimbursement of costs incurred.
- "Spreadsheet" forms which you must use in conjunction with your Reimbursement Request.
- "Claimant Data Record" (Std. Form 204) which must be completed and returned with your first Reimbursement Request.

YOU MUST SUBMIT A REIMBURSEMENT REQUEST PACKAGE BY June 26, 1995, OR SEND A WRITTEN UPDATE EXPLAINING:

1. Status of cleanup to date.
2. Reason(s) why a reimbursement request has not been submitted.
3. Costs incurred to date for corrective action.
4. Projected date for submitting a reimbursement request.

We constantly review the status of all active claims. If you do not submit a reimbursement request or a written update by the date above, or fail to proceed with due diligence with the cleanup, we will take steps to withdraw your Letter of Commitment.

If you have any questions regarding the Letter of Commitment or the Reimbursement Request package, please contact Blessy Torres at (916) 227-4535.

Sincerely,

Dave Deane, Manager  
 UST Cleanup Fund Program

Enclosures

cc: Mr. Steve Morse  
 California Regional Water Quality  
 Control Board, San Francisco Bay Region  
 2101 Webster Street, Suite 500  
 Oakland, CA 94612

Mr. Tom Peacock  
 Alameda County EHD  
 1131 Harbor Bay Pkway, 2nd Fl  
 Alameda, CA 94502-6577

LETTER OF COMMITMENT FOR REIMBURSEMENT OF COSTS

CLAIM NO: 004132

AMENDMENT NO: 0

CLAIMANT: American Brass and Iron Foundry

BALANCE FORWARD: \$0

CO-PAYEE: None

JOINT CLAIMANT: None

THIS AMOUNT: \$20,000

NEW BALANCE: \$20,000

CLAIMANT ADDRESS: Attn: Dave Robinson  
7825 San Leandro Street  
Oakland, CA 94621

TAX ID/SSA NO: 94-1107069

Subject to availability of funds, the State Water Resources Control Board (SWRCB) agrees to reimburse American Brass and Iron Foundry (Claimant) for eligible corrective action costs at American Brass and Iron Foundry 7825 San Leandro Street, Oakland, CA 94621 (Site). The commitment reflected by this Letter is subject to all of the following terms and conditions:

1. Reimbursement shall not exceed \$20,000 unless this amount is subsequently modified in writing by an amended Letter of Commitment.
2. The obligation to pay any sum under this Letter of Commitment is contingent upon availability of funds. In the event that sufficient funds are not available for reasons beyond the reasonable control of the SWRCB, the SWRCB shall not be obligated to make any disbursements hereunder. If any disbursements otherwise due under this Letter of Commitment are deferred because of unavailability of funds, such disbursements will promptly be made when sufficient funds do become available. Nothing herein shall be construed to provide the Claimant with a right of priority for disbursement over any other claimant who has a similar Letter of Commitment.
3. All costs for which reimbursement is sought must be eligible for reimbursement and the Claimant must be the person entitled to reimbursement thereof.
4. Claimant must at all times be in compliance with all applicable state laws, rules and regulations and with all terms, conditions, and commitments contained in the Claimant's Application and any supporting documents or in any payment requests submitted by the Claimant.
5. No disbursement under this Letter of Commitment will be made except upon receipt of acceptable Standard Form Payment Requests duly executed by or on behalf of the Claimant. All Payment Requests must be executed by the Claimant or a duly authorized representative who has been approved by the Division of Clean Water Programs.
6. Any and all disbursements payable under this Letter of Commitment may be withheld if the Claimant is not in compliance with the provisions of Paragraph 5 above.
7. Neither this Letter of Commitment nor any right thereunder is assignable by the Claimant without the written consent of the SWRCB. In the event of any such assignment, the rights of the assignee shall be subject to all terms and conditions set forth in this Letter of Commitment and the SWRCB's consent.
8. This Letter of Commitment may be withdrawn at any time by the SWRCB if completion of corrective action is not performed with reasonable diligence.

IN WITNESS WHEREOF, this Letter of Commitment has been issued by the SWRCB this 24th day of March, 1995.

STATE WATER RESOURCES CONTROL BOARD

BY Dave  
Manager, Underground Storage Tank Cleanup Fund Program

BY James B. Stafford  
Chief, Division Administrative Services

STATE USE:  
CALSTARS CODING:  
0550-569.02 - 30530  
\$ \_\_\_\_\_



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST AGENCY DIRECTOR

May 18, 1994  
StID # 523

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

Mr. Dave Robinson  
American Brass and Iron  
7825 San Leandro St.  
Oakland CA 94621

**Re: Status of Subsurface Investigation at AB&I, 7825 San Leandro  
St., Oakland CA 94621**

Dear Mr. Robinson:

Thank you for the submittal of the requested documents included with your May 13, 1994 cover letter. We received those documents on May 17, 1994 and have completed our review. I would like to clarify our office concerns and respond to the question posed within the cover letter.

In regards to the submission of quarterly monitoring reports, it is good to hear that AB&I intends to submit such reports to our office in a timely fashion. It appears that the first quarterly event occurred in August 1993 instead of May 1993 as would have been expected. Our office has concerns regarding the contents of these reports. In the August 1993 report from BSK & Associates Figure 7, a groundwater gradient map is referenced, however, it does not appear among your submitted documents. In addition, all future reports must include:

- \* A cover letter from the responsible party, AB&I, either concurring or disagreeing with the findings of the report;
- \* A site map indicating the groundwater flow direction for the current sampling event and all previous sampling events;
- \* Tabulated analytical results from the current sampling event plus all prior sampling events;
- \* The proposed next quarter activities;
- \* A recommendation and conclusion section; and
- \* Signature by the registered professional issuing the report.

It was noted that only analytical results, field logs and quality control data was submitted for the 12/3/93 and 3/4/94 reports.

In regards to the documentation of the treatment of stockpiled soils the submission of your soil treatment diagram, though illustrative, is not sufficient. Please provide the following:

Mr. Dave Robinson  
AB&I  
StID # 523  
May 18, 1994  
Page 2.

\* A tabulation of data, in cubic yards or tonnage amounts, which accounts for all stockpiled soils generated and reused at this site or at any other site (ie R&A Trucking).

\* Please describe the sampling procedure and sampling frequency for the verification samples.

\* Please provide copies of all certified analytical results of these verification samples.

\* For those soils disposed to an appropriate landfill, please provide copies of their waste disposal receipts.

Now that we have received the previous monitoring event results, I would like to comment on July 29, 1993 proposal included in your document package. Recall, this proposal was based on the northwesterly gradient found after the initial well sampling. Since this time, it appears that the gradient has been southwesterly, therefore, it may be appropriate to change the well point locations. I would suggest moving one well point southwest of MW-2 and another southwest of MW-1. The location of SP-2 may still be appropriate but SP-3 and SP-1 may not be upgradient as previously thought. Please provide comment to these observations prior to scheduling this work.

Lastly, in regards to your inquiry as to the requirements of those reviewing and requesting work, at this time, there are no registration or certification requirements for the hazardous materials specialist job class, though this job class requires knowledge in many disciplines including: hazardous materials handling, regulations, storage, sampling, analysis, toxicology and geology to mention a few.

This certification requirement, as stated in the Business and Professions Code and also stated in Professional and Vocational Regulations, is actually meant to protect the responsible party. With the many professionals offering environmental services, this requirement is meant to insure that there is a degree of consistency, reliability and accountability to all proposals, interpretations, recommendations and conclusions. It is by no means an attempt to discredit those without these qualifications.

Mr. Dave Robinson  
AB&I  
StID # 523  
May 18, 1994  
Page 3.

Please provide the requested documents and information **within 30 days or by June 20, 1994**. You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
T. Berger, BSK & Associates, 1181 Quarry Lane, Bld 300.  
E. Howell, files

3-ABI



7825 San Leandro Street • Oakland, CA 94621

(510) 632-3467 • Fax (510) 632-8035

May 13, 1994

Mr. Barney Chan  
ALAMEDA COUNTY HEALTH  
CARE SERVICES AGENCY  
Department of Environmental Health  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621

Dear Mr. Chan:

The following information was prepared in response to your letter dated April 12, 1994. As requested, all relevant technical documents were enclosed for your review. In your letter several points were made with regard to information concerning progress with AB&I underground storage tank(s) project. Below is a brief response addressing individual issues or concerns, backup information was enclosed were applicable.

Monitoring of ground water at AB&I's Oakland site has been performed on a quarterly basis, starting in August of 1993. The water was analyzed for potential contaminants as originally requested by the ACHD, including testing for semi-volatile compounds, Method 8270, in MW - 2. For details refer to the enclosed monitoring report(s) and monitoring data. Ground water monitoring reports will be submitted on a quarterly bases in a timely manner.

*this was not  
done.*

In response to determining the extent of soil and groundwater contamination, BSK & Associates has prepared a proposal / work plan for Contaminant Plume Characterization, dated July 29, 1993. Proposal PR93204 will determine and define the extent of the contamination from the former UST locations. Upon your review, AB& I will move forward with the project.

54 MAY 17 AM 10:17

ALCO  
HAZMAT



The information was submit in prior correspondence in clarifying disposition of the excavated soil from underground storage tank removal(s). In the cases of tank excavation soils, excluding the tank containing Diesel fuel, the soil was treated on site through aeration and analyzed for suspected contaminants. The process continued until the soil was deemed clean. Aeration permits were obtained from the Bay Area Air Quality Management District. Copies of the permits were submitted to the ACHD office. In the case of the removal of the underground Diesel tank excavation, biotreatment was performed by Bio Converters, Inc. until levels were below landfill requirements. The material was then sent to the local landfill. ~~A graphic illustration of the process was enclosed.~~ The path that AB&I choose required both time and resources in order to recycle the UST materials onsite versus simply sending the material to the local landfill

*need copies  
of analytical  
permits -  
description of  
systems*

*copy of  
wt tag receipt*

In your last comment regarding the requirements for a registered professional to sign all documents which entails decisions, interpretations and/or recommendation, does this also apply to the person reviewing the information for approving or requesting additional work? In reviewing the Tri- Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites the information was not clearly defined.

AB&I over the past three years have focused its resources on environmental concerns in order to comply with current regulations and requirements. Although, AB&I is relatively a small company, a high number of environmental issues have directly affected our operations, exhausting limited resources. We appreciate your efforts with the overall UST project at this site and look forward to finalizing the investigation efforts this year.

If you have any questions or require additional information, please feel free in contacting me at (510) 632 -3467, extension 211.

Sincerely,

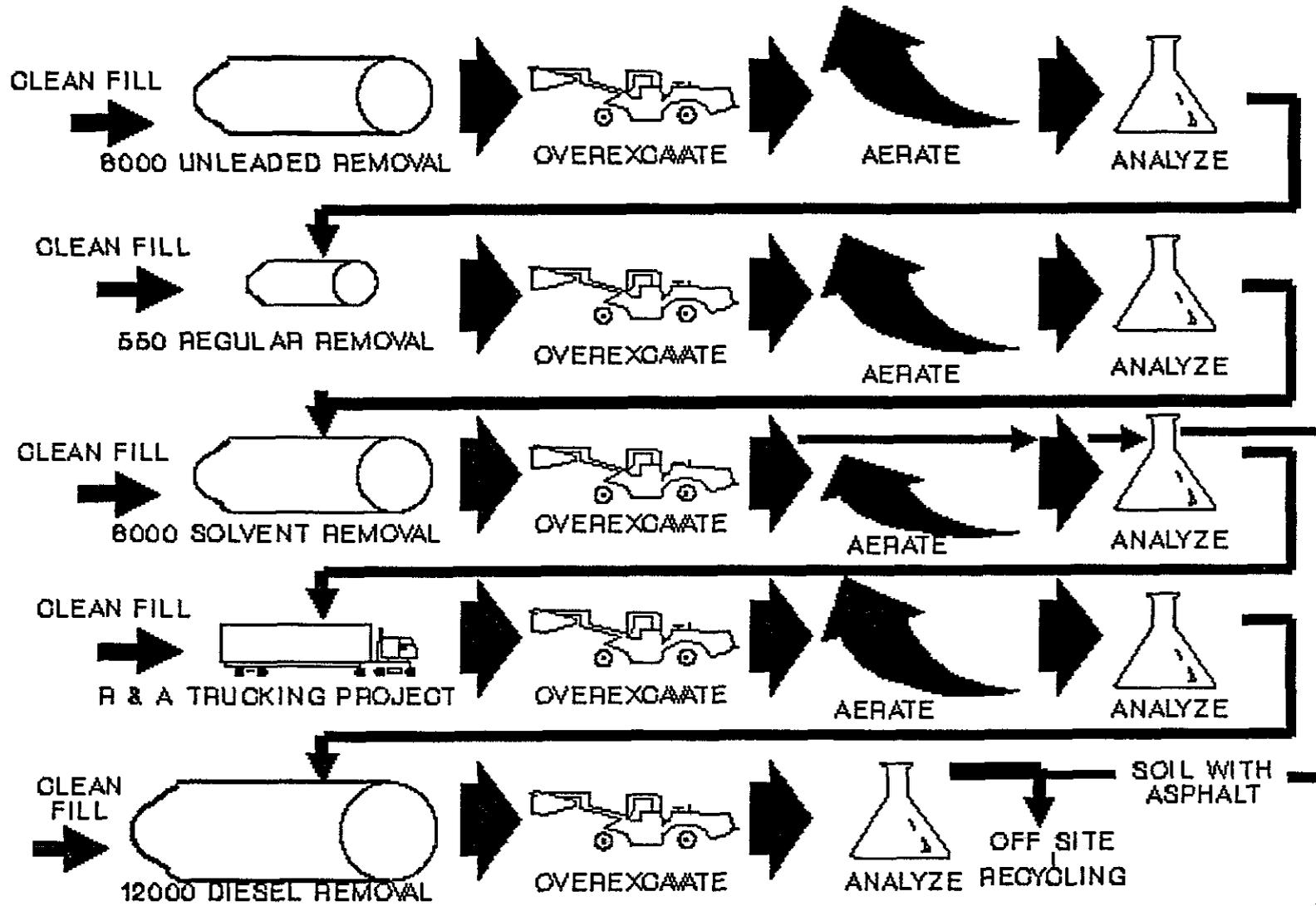
Dave Robinson  
Environmental Engineering Manager

Enclosures:

# A B & I UNDERGROUND TANK REMOVALS

11/10/92

## EXCAVATION AND BACKFILLING



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 9, 1994  
StID # 523

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

Mr. Dave Robinson  
American Brass and Iron  
7825 San Leandro St.  
Oakland CA 94621

**Re: Comment on July 29, 1993 Work Plan for Contaminant Plume  
Characterization at 7825 San Leandro St., Oakland 94621**

Dear Mr. Robinson:

Our office would like to comment on the above work plan prepared by your consultant, BSK & Associates. This work plan responds to my June 15, 1993 letter requesting further soil and groundwater delineation in the areas of the former TCA and gasoline tanks. It proposes three temporary well points to take soil and groundwater samples up- and downgradient to these areas. Although it would be best to evaluate the appropriateness of the locations of these well points **after** receiving all the quarterly monitoring reports, if the groundwater gradient is consistent with that which was found initially, these well points are acceptable. Mr. Tim Berger of BSK stated that the locations were proposed based on the initial gradient information. After this work is done, permanent well locations should be proposed.

Our office hopes that this work was not put on hold pending our office's approval. Please keep in mind, Section 2726 (c) of Article 11, Chapter 16 of the California Code of Regulations allows for the implementation of a work plan **sixty days** after submittal with or without agency approval.

In your response to my April 12, 1994 letter, please indicate when you plan to implement this work plan if it still is your intended approach for contaminant delineation. Please contact me **48 working hours** prior to any field activity so I may arrange to be on-site if possible. You may reach me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
T. Berger, BSK & Associates, 1181 Quarry Lane, Bld 300,  
Pleasanton, CA 94566  
E. Howell, files wpABI

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

April 12, 1994  
StID # 523

Mr. Dave Robinson  
American Brass and Iron  
7825 San Leandro St.  
Oakland CA 94621

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

**Notice of Violation**

**Re: Request for Technical Reports for Groundwater Sampling at  
American Brass and Iron, 7825 San Leandro St., Oakland 94621**

Dear Mr. Robinson:

Our office's last receipt of technical reports from AB&I consisted of a June 15, 1993 cover letter attached to the April 1993 BSK & Associates report which detailed the installation of four monitoring wells at the above site. I wrote to you in a June 18, 1993 letter commenting on this report. This letter stated our office's concerns regarding the investigation of the former TCA tank and the former gasoline tank. These areas still required investigation to determine the extent of soil and groundwater contamination. I also inquired about the disposition of all contaminated soil from the four tank removals performed at this site. I'm also concerned about all spoils taken from the tank removal and overexcavation at R & A Trucking on 77th Ave. and Hawley St. since you are helping Mr. Cole oversee this site. This June 18, 1993 letter requested a comment by August 2, 1993. Since the June 15, 1993 communication, our office has not received any comment to this letter nor have we received any subsequent quarterly monitoring reports. Since the wells were initially sampled in March of 1993, it appears that well over one year has past without the submission of any quarterly monitoring reports.

Please be reminded that Section 2652 8 (d) of Chapter 16 of Title 23 of the California Code of Regulations states that until the investigation and cleanup are complete, the owner or operator shall submit reports to the local agency every 3 months or at a more frequent interval. In addition, Section 25298 (c) 4 of the California Health and Safety Code, Division 20, Chapter 6.7 states that no person shall close an underground tank unless that person has taken steps to demonstrate to the appropriate agency that the site has been investigated to determine if there are any present, or were past releases, and if so that appropriate corrective or remedial actions have been taken. Section 25299 (5) allows for the civil penalty of not less than \$500 or more than \$5000 for each underground tank and for each day which the operator fails to properly close an underground tank.



Mr. Dave Robinson  
American Brass and Iron  
StID # 523  
April 12, 1994  
Page 2.

Because the monitoring wells were sampled initially in March of 1993, four additional quarterly monitoring events should have been performed. Please send the following technical reports to our office **within 30 days or by May 16, 1994:**

1. All quarterly monitoring reports after the initial monitoring well installations. Please acknowledge that you will be continuing quarterly monitoring from this point on unless you have received approval from our office or that of the RWQCB. All quarterly reports should be sent to our office no later than 45 days after the monitoring event. You are reminded to analyze MW-2 for semi-volatile compounds, Method 8270, at least once if it hasn't yet been done.
2. Provide written response as to how the extent of soil and groundwater contamination from each of the former tank pit areas will be determined. If no further work is proposed, please explain why.
3. Please give the current status of all stockpiled soils from the four tank removals at this site. If these soils are being remediated on site, please describe the process and provide a sampling and analysis procedure if you intend to reuse any of this soil as "clean fill".
4. Please keep in mind all decisions, interpretations and recommendations of a geologic nature will require the signature and stamp of currently registered professional: RG, RCE, or PE.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the requested documents may subject AB&I to civil liability and referral of this site for enforcement.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
T. Berger, BSK & Associates, 1181 Quarry Lane, Bld 300,  
Pleasanton, CA 94566  
E. Howell, files NOVABI



# AMERICAN BRASS & IRON FOUNDRY

7825 San Leandro Street • Oakland, CA 94621 • (510) 632-3467  
Fax No. (510) 632-8035

August 3, 1993

# 523

93 AUG -4 PM 1:05

Mr Barney Chan  
Alameda County Health  
Care Services  
80 Swan way, Room 200  
Oakland, CA 94621

*It would be best to respond to this w/p after receiving the QARs. If cont found in any well points will need to install a permanent well.*

Dear Mr. Chan:

AB&I has prepared the following in response to your letter dated June 18, 1993, regarding the ground water investigation report for our site at 7825 San Leandro Street, Oakland.

For your review I have enclosed BSK & Associates Consulting Firm work plan for the preliminary characterization of a contaminant plume within the foundry property and, for monitoring the four ground water monitoring wells on site. It is our intention this work will determine extent of the contamination plume for both MW-2 and MW-4. In addition will evaluate the potential of contamination entering our facility from outside our boundary lines.

In responding to your request for information concerning the status of the stock pile soil generated from the four tank pulls. I have already given the information including copies of required permits to your office. Please inform me if you require duplicate copies.

It was my understanding that BSK had notified your office before the installation of the wells occurred. I apologize if there was a mis-communication, but can assure you that we will notify you before any further work is performed on the UST investigation.

If you have any questions please feel free to contact me at 510-632-3467 ext. 211.

Sincerely,

Dave Robinson  
Environmental Engineering Manager

DR/lp

Enclosure



1181 Quarry Lane  
Building 300  
Pleasanton, CA 94566  
(510) 462-4000  
(510) 462-6283 FAX

---

July 29, 1993

BSK Proposal PR93204.3

American Brass and Iron Foundry  
7825 San Leandro Street  
Oakland, CA 94621

Attention: Mr. David Robinson  
Environmental Engineer

Subject: Proposal/Work Plan  
Contaminant Plume Characterization, and  
Groundwater Well Monitoring  
American Brass and Iron Foundry  
7825 San Leandro Street  
Oakland, California

As requested, BSK & Associates has prepared this Proposal Work Plan for the preliminary characterization of a contaminant plume within the American Brass & Iron Foundry (AB&I) property and, for monitoring of four groundwater monitoring wells installed by BSK in February 1993.

## 1.0 BACKGROUND

BSK & Associates installed four shallow ground water monitoring wells in February 1993 (BSK Report P92270.3, dated April 30, 1993) to monitor the effect to groundwater and soil of four Underground Storage Tanks (USTs) removed from the AB&I facility in 1992. As reported by BSK, a significant impact to soil and groundwater was apparent at two of the wells; MW-2 and MW-4. Concentrations of gasoline and chlorinated solvent constituents were detected at Well MW-2, and gasoline compounds at Well MW-4.

## 2.0 PURPOSE AND SCOPE

### 2.1 Purpose

This proposal has been prepared to address two objectives of AB&I: (1) Provide information regarding the lateral extent of soil and groundwater contamination in the area of Wells MW-2 and MW-4 and (2) Provide for quarterly monitoring of the four wells installed to further

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assess the impact, if any, from the removed UST. These objectives are prepared to address the comments of the Alameda County Department of Environmental Health (ACDEH) in their letter of June 18, 1993 to AB&I, " Comments on April 1993 Groundwater Investigation Report for AB & I, 7825 San Leandro Street, Oakland, CA 94621.

## 2.2 Scope

### TASK 1: CHARACTERIZATION OF GROUNDWATER CONTAMINANT PLUME

*Using + hydroponic spler.*  
Two to three temporary shallow groundwater sample-points are proposed for the areas up- and down-gradient from the area of Wells MW-2 and MW-4. The proposed sample-point locations are shown in Figure 1, Site Plan.

The sample-points would be used to obtain soil and groundwater information up- and down-gradient of the wells. The soil and groundwater information would be used to provide definition of the lateral extent of contamination, and indicate if contamination may be contributed from an off-site source.

### TASK 2: MONITORING OF GROUNDWATER MONITORING WELLS

Quarterly monitoring of the four wells installed by BSK for a period of one year, as recommended by BSK in their report, P92270.3, and affirmed by the ACDEH is proposed. Regular monitoring would provide information regarding groundwater flow and contaminant concentration at the site, and possibly verify that groundwater has not been impacted in the area of Well MW-3.

## 3.0 METHODOLOGY

### **3.1 Drilling and Installation**

Drilling activities would be performed using a truck-mounted Mobile B-53 auger rig, turning 8-inch outside diameter hollow stem auger, or 4-inch solid flight auger. The borings for the sample-points would extend to a maximum depth of approximately 25 feet, depending on encountered subsurface conditions. Logging of boring samples and cuttings, and direction of site activities would be performed by a geologist/engineer, under the supervision of a Registered Geologist or Licensed Civil Engineer. Classification of subsurface materials would be performed in accordance with the Unified Soil Classification System (U.S.C.S.).

### **3.2 Sampling**

#### **3.2a Sample-points**

Soil samples would be obtained every five feet from surface, and as determined by field conditions, for screening by Photo-ionization Detector (PID). Soil samples would be obtained using a 2.0-inch I.D. modified California split-spoon sampler, containing three 2- x 6-inch stainless steel sample liners. The sampler holding the liners is driven by slide hammer ahead of the auger into undisturbed soil, and then withdrawn. The soil-filled liners are removed, and the selected sample(s) sealed with Teflon® sheeting and a pressure-fitted plastic cap, labeled, and refrigerated by dry- and/or water-ice for delivery to our State-certified analytical laboratory for analysis. Samples for analysis would be obtained within the capillary fringe, and as determined by subsurface conditions.

Water samples would be obtained by Teflon® or stainless steel bailer through the stainless steel Sample-point screen. Samples would be obtained in order of decreasing constituent volatility, and placed in the appropriate container, with preservative as necessary. The sample would then be labeled, sealed and refrigerated with water-ice for delivery to our laboratory.

#### **3.2b Groundwater Well Monitoring**

Water samples from existing site wells would be obtained after purging each of three to ten casing volumes, and allowing eighty percent recovery. Observation of water level and for immiscible product would be performed using an electric sounder and point-source bailer prior to purging. The water level would be recorded to the nearest 1/100th of a foot. During the purge, the groundwater pH, temperature and conductivity would be monitored and recorded at regular intervals to assess the influx of fresh formation water. Water samples for analytical testing would be obtained by Teflon® bailer or bladder pump, and transferred to the appropriate storage container, with preservative as needed. The samples would then be labeled and refrigerated on-site using water or blue ice, to 4°C.

### **3.3 Chemical Testing**

#### **3.3a Sample-points**

Selected soil and water samples from all sample-points (SP-1, SP-2 and SP-3) would be tested for Gasoline-type motor fuel and total lead concentrations. The down-gradient sample-point, SP-2, would be tested for contaminants previously detected at Well MW-2: Chlorinated-solvent, Motor-fuel and Oil and Grease.

Analysis for Motor-fuel and solvents would be by EPA Methods 601/8010 and 602/8020. Additional motor fuel characterization would utilize analyses for Total Petroleum Hydrocarbons as Gasoline (TPHg) and Diesel (TPHd), and Total Lead. Oil and Grease would be analyzed for total and hydrocarbon constituents.

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3.3b Groundwater Well Monitoring

Existing wells would be sampled and analyzed as initially sampled and analyzed in March 1993, BSK report P92270.3.

**Well MW-1**

TPHdiesel by GCFID-3510  
BTEX by Method 602

**Well MW-2**

Chlorinated Solvent by EPA Method 601  
Oil and Grease by Methods 5520 C&F  
TPHgasoline by GCFID-5030  
BTEX by EPA Method 602

**Well MW-3**

TPHgasoline by GCFID-5030  
BTEX by Method 602

**Well MW-4**

TPHgasoline by GCFID-5030  
BTEX by Method 602  
Total Lead by Atomic Adsorption

**3.4 Waste Handling**

Soil waste generated by drilling would be stockpiled on polyethylene sheeting and covered with the same for temporary storage and ease of removal, pending contaminant concentration determination.

Water waste generated by drilling, cleaning and sampling activities would be stored in well-specific, DOT-approved 17E/H 55 gallon drums. Each drum would be labeled with the date of waste accumulation, waste type (soil or water), source and source address. The drums would be stored on-site until chemical analyses determine the character of the drum contents. Disposal of drummed and stockpiled waste is the ultimate responsibility of the client.

**3.5 Decontamination**

Drilling and sampling equipment would be thoroughly cleaned by hi-pressure and temperature wash and/or laboratory-grade surfactant wash and triple rinse, prior to site entry, exit, and between boring and sample locations in order to reduce the chance of cross-contamination between samples and sites.

### **3.6 Reporting**

#### **3.6a Sample-points**

A summary report would be prepared describing the work-performed, field observations and findings, and analytical results. Our conclusions, and recommendations for additional work, if any, would be presented as well.

#### **3.6b Groundwater Well Monitoring**

A summary report would be prepared for each sampling event. The report would describe the work performed, record groundwater flow, gradient and physical condition, and present the analytical results.

## **4.0 SCHEDULE AND FEES**

### **4.1 SCHEDULE**

#### **4.1a Sample-points**

BSK would begin work on this project promptly following our receipt of your signed authorization and approval to proceed. Based on ready access to the site, and receipt of the necessary permits, our report would be completed within five to six weeks of our authorization to proceed.

#### **4.1b Groundwater Well Monitoring**

Groundwater monitoring could begin upon receipt of your authorization. Monitoring would be performed quarterly, with each quarter reported within three weeks of the sample date.

### **4.2 FEES**

Our fees for this work would be computed in accordance with our 1993 Fee Schedule. The total charges for the scope of work outlined herein for Task 1, Sample-points : is estimated to be \$7,600. The estimated charges per quarter for Task 2, Groundwater Well Monitoring: is \$2500. The estimated fees would not be exceeded without prior client notification and consent.

A summary breakdown of the fees for the work described is provided below:

TASK 1: SAMPLE-POINTS

Temporary Sample-points - Materials & Installation .....	4,000
Chemical Analyses .....	2,000
Report Preparation .....	<u>1,600</u>
<b>TOTAL:</b>	<b>\$7,600</b>

TASK 2: QUARTERLY GROUNDWATER MONITORING

Field Work and Supplies .....	\$830
Chemical Analyses .....	745
Report Preparation .....	<u>935</u>
<b>TOTAL:</b>	<b>\$2,500</b>

\* \* \* \* \*

The General Conditions and Terms are presented on the attached BSK & Associates' Terms for Agreement for Environmental Consulting Services, which is part of this Proposal PR93204.3.

If the proposed scope of services, fee and Terms for Agreement are acceptable, please sign the "Authorization and Acceptance" form attached after the Terms. Actual work would begin upon our receipt of a complete signed copy of this Proposal PR93204.3.



BSK appreciates the opportunity to submit this proposal, and look forward to continuing to provide environmental consulting services for you on this project. Should you have questions regarding this submittal, please contact us.

Respectfully submitted,  
**BSK & Associates**



Alex Y. Eskandari, P.E.  
Manager - Geo-Environmental Services  
C.E. 38101



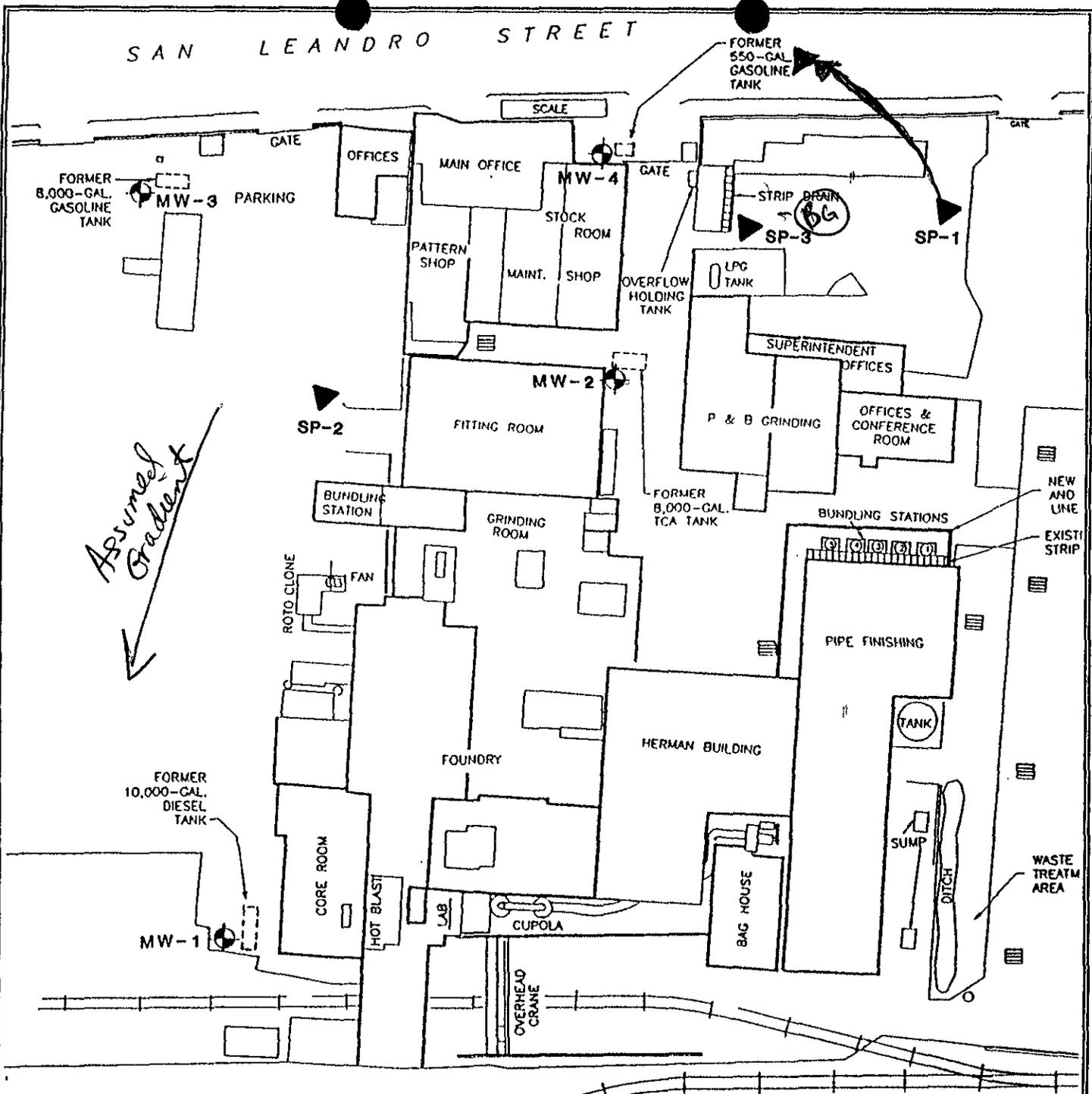
Tim W. Berger, R.G.  
Certified Engineering Geologist  
C.E.G. 1828

AYE/TWB:ndp/slc  
(PROENVPR93204.ABI)

Enclosures:

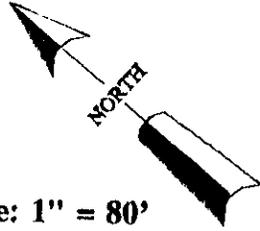
Figure 1: Site Plan

BSK Authorization and Acceptance  
BSK & Associates' Terms for Environmental Consulting Services



**LEGEND:**

- ⊙ - Location and Designation of Existing Monitoring Well
- ▲ - Proposed Location and Designation of Sample-point



Scale: 1" = 80'

PROPOSAL/WORK PLAN  
 CONTAMINANT PLUME CHARACTERIZATION  
 AMERICAN BRASS AND IRON FOUNDRY  
 7825 SAN LEANDRO STREET  
 OAKLAND, CALIFORNIA

**SITE PLAN**  
 Proposal No. PR93204.3  
 July 1993  
 FIGURE: 1

**BSK**  
 & ASSOCIATES

**BSK & ASSOCIATES' TERMS FOR  
AGREEMENT FOR ENVIRONMENTAL CONSULTING SERVICES**

**Scope of  
Services**

CONSULTANT shall perform the environmental consulting services that are specified by the Agreement for the agreed upon amount of compensation. CLIENT understands that environmental investigations are performed in phases. Initial phases, such as preliminary site assessments, are intended to assist in developing alternatives and plans for further investigation and consequently do not entail the more exhaustive, and more expensive, investigations performed during later phases of investigation. CLIENT understands that later phases may lead to discovery of conditions not encountered during the initial investigative phases.

Any increase to the scope or other modification shall be made in writing, and it is expressly understood by the parties that these Terms For Agreement For Environmental Consulting Services apply to any modification to the Agreement.

**Professional  
Responsibility**

CONSULTANT shall perform its services consistent with that level of care and skill ordinarily exercised by other professional consultants practicing in the locality of the Project site under similar circumstances at the time the services are performed. CLIENT understands that the investigation, characterization, and assessments of hazardous or toxic material involve technologies that are rapidly evolving. Existing state of the art technologies are often new and untried; future technologies may supersede current technologies and the current standard of care. CLIENT understands that CONSULTANT's recommendations must be based upon technologies, standards, and other technical information known at the time the recommendations are made. Present recommendations may differ from recommendation that might be made at a previous or later time because of the evolving standard of care.

No other representation, warranty or guarantee, express or implied, is included or intended by the Agreement.

**Subsurface  
Conditions**

CONSULTANT's investigations and recommendations will be based on test borings, surveys or other investigative work. CLIENT understands that subsurface conditions elsewhere at the Project site may differ from those where test borings had been taken and further recognizes that geologic conditions may change over time.

**Certifications**

CONSULTANT shall not be required to execute or supply any certification of any environmental conditions at the site unless

- 1) CONSULTANT, in its sole judgment, believes that sufficient work has been performed by CONSULTANT to provide the certification;
- 2) CONSULTANT, in its sole judgment, believes that the site conditions investigated meet the criteria of the certification; and
- 3) the exact form of such certification has been provided to CONSULTANT prior to the execution of the Agreement, and CONSULTANT has agreed, in writing, that the form is acceptable. Any certification supplied by CONSULTANT does not constitute a warranty or guarantee, either express or implied.

**Disclosure of  
Site History**

CLIENT shall provide to CONSULTANT all known information regarding the current and historical past uses of the Project site. CLIENT further agrees that CONSULTANT may rely upon all such information supplied by CLIENT, and CLIENT warrants the accuracy and completeness thereof.

**Hazardous  
Substances**

CLIENT agrees that it will supply to CONSULTANT all known information regarding the nature and existence of any hazardous, toxic or dangerous materials that exist on the Project site and that exist on any neighboring properties to the Project site. CLIENT will also inform CONSULTANT of any known leak, discharge or other release of any hazardous, toxic or dangerous materials on the Project site and on any neighboring properties of the Project site. If CLIENT subsequently becomes aware of any such information, it shall immediately inform CONSULTANT of the additional information. CLIENT further agrees that CONSULTANT may rely upon all such information supplied by CLIENT, and the CLIENT warrants the accuracy and completeness thereof.

If CONSULTANT discovers unanticipated hazardous, toxic or dangerous materials during the performance of the Agreement, said discovery shall constitute a **CHANGED CONDITION** mandating re-negotiation of the scope of work to be performed by CONSULTANT and the terms under which the work is to be performed. In the event that CONSULTANT takes emergency measures to protect the health and safety of CONSULTANT personnel and/or the public, CLIENT shall compensate CONSULTANT for the cost of such emergency measures.

Notwithstanding anything to the contrary herein, except to the extent that any claim, cost, expense, fine or penalty arises from the gross negligence or willful misconduct of CONSULTANT, its employees or agents, (for purposes of this provision, "agents" shall include CONSULTANT's suppliers or subcontractors of any tier) in CONSULTANT's performance of the Agreement, CLIENT shall remain responsible for any and all contaminants, pollutants, hazardous waste, spillage, seepage, adverse effect or environmental impairment occurring, incident to, arising out of, or in connection with any job performed or to be performed hereunder and CONSULTANT, its employees or agents shall not be responsible for any such contaminants, pollutants, hazardous waste, spillage, seepage, adverse effect or environmental impairment except to the extent that such claims, demands, costs, expenses, fines, or penalties, causes of action, suits, or other litigation arise out of the gross negligence or willful misconduct of CONSULTANT, its employees or agents. CLIENT shall protect, defend, indemnify and hold harmless CONSULTANT, its corporate affiliates and their respective officers, directors, employees and agents free and harmless from and against any and all claims, demands, cost, expense, fines or penalties, causes of action, suits or other litigation (including all costs thereof and attorneys' fees) of every kind and character on account of bodily injury, damage to property or violation of any pollution or similar law or regulation on account of, or incident to, or arising in connection with any pollution contamination, hazardous waste, spillage, seepage, adverse effect or environmental impairment arising out of or in connection with any job performed or to be performed hereunder, except to the extent that such claims, demands, cost, expense, fines, or penalties, causes of action, suites, or other litigation arise from the gross negligence or willful misconduct of CONSULTANT, its employees or agents.

- Right of Entry** CLIENT shall grant or arrange permission for right of entry by CONSULTANT upon the Project site to provide the Services under the Agreement, whether or not the Project site is owned by CLIENT. The use of environmental equipment and practice may unavoidably alter the existing site conditions and affect the environment in the area being studied. CONSULTANT will operate with reasonable care to minimize damage to property. The cost of repairing such damage will be born by CLIENT, unless otherwise specified in the Agreement.
- Underground Utilities** Prior to the initiation of CONSULTANT's field investigation, CLIENT shall designate the location of all subsurface structures, such as pipes, underground tanks, cables and utilities, within the property lines of the Project site and shall supply to CONSULTANT any written documentation regarding same. CLIENT warrants the accuracy of any information supplied to CONSULTANT, acknowledges that CONSULTANT will not verify the accuracy of such information, and agrees that CONSULTANT is entitled to rely upon the information supplied by CLIENT. CLIENT agrees to defend, indemnify and hold harmless CONSULTANT for any claims or damages related to the location of any subsurface structures at the Project site.
- Limitation of Liability** CLIENT agrees to limit the liability of CONSULTANT and all officers, directors, agents, shareholders, employees, consultants, subcontractors, and all other representatives of CONSULTANT to CLIENT for all claims, suits, arbitrations or other proceedings, to an aggregate amount of \$50,000 or the amount of compensation received by CONSULTANT for services performed regarding the Project, whichever is greater, whether or not such claims, causes of actions, suits, arbitrations, or other proceedings are based on negligence, breach of contract, strict liability or any other theory of legal liability. This limitation of liability includes any claim for attorneys' fees due under the Agreement.
- CLIENT further agrees to notify any contractor or subcontractor who may perform work in connection with any design, report, or study prepared by CONSULTANT of such limitation of liability and require as a condition precedent to their performing the work a like limitation of liability on their part as against the CONSULTANT. In the event CLIENT fails to obtain a like limitation of liability provision, any liability of CLIENT and CONSULTANT to such contractor or subcontractor shall be allocated between CLIENT and CONSULTANT in such a manner that the aggregate liability of CONSULTANT to all parties, including CLIENT, shall not exceed \$50,000 or the amount of CONSULTANT's fee, whichever is greater. This limitation includes any claim for attorneys' fees due under the Agreement.
- This limitation of liability shall survive the expiration or termination of the Agreement and shall apply to any additional services not otherwise covered under the Agreement which are provided by CONSULTANT for the Project, whether or not such services are memorialized by an amendment, addendum or other modification to the Agreement.
- Consequential Damages** To the fullest extent permitted by law, CLIENT agrees that the CONSULTANT shall not be liable for any special, indirect or consequential damages, whether or not such claims, suits, arbitrations, or other proceedings are based on negligence, breach of contract, strict liability or other theory of legal liability.
- Indemnification** CLIENT shall defend, indemnify and hold harmless CONSULTANT, its officers, directors, agents, shareholders, employees, consultants, subcontractors, and all other representatives from and against all claims, injunctions, administrative proceedings, suits, damages or liability, direct or indirect, arising out of or resulting from the CONSULTANT's performance of services under the Agreement, unless liability arises by virtue of the sole negligence or intentional wrongful acts of CONSULTANT, its officers, directors, agents, shareholders, employees, consultants, subcontractors, and other representatives.
- Samples and Cuttings** CONSULTANT shall retain any soil, rock, water and other samples obtained from the Project as it deems necessary for a period not longer than forty-five (45) days after the issuance of any documents that includes the data obtained from those samples.
- Disposal of Materials** CLIENT shall be responsible for the removal and lawful disposal of any samples, cuttings and hazardous substances.
- Job Site Safety** CONSULTANT shall not be responsible for the safety of any persons other than its own employees, nor shall it be responsible for the operations, procedures, or practices of persons or entities other than CONSULTANT, its consultants, and its subcontractors.
- Changed Conditions** If, during the course of CONSULTANT's performance under the Agreement, conditions or circumstances are discovered which were not contemplated by CONSULTANT at the commencement of the Agreement, CONSULTANT shall notify CLIENT in writing of the newly discovered conditions or circumstances, and CLIENT and CONSULTANT shall then re-negotiate in good faith the terms of the Agreement. If amended terms cannot be agreed upon within 30 days after said notice, CONSULTANT may terminate the Agreement, and CONSULTANT shall be compensated as set forth herein under **TERMINATION**.
- Termination** The Agreement may be terminated by either party upon seven (7) days written notice in the event of a material breach of the Agreement. CONSULTANT may terminate the Agreement if CLIENT suspends CONSULTANT's work for more than sixty (60) days. In the event of termination, CLIENT shall pay CONSULTANT for the services performed prior to the date of termination, plus actual termination expenses incurred by CONSULTANT, including, but not limited to, the cost of completing analysis, records and reports necessary to document the Project's status at the time of termination.
- CLIENT agrees that the limitation of liability and the indemnity obligations of the Agreement shall be binding notwithstanding any termination of the Agreement.
- Delays** In the event CONSULTANT's services under the Agreement are interrupted due to delays other than delays caused by CONSULTANT, CONSULTANT shall be equitably compensated (in accordance with CONSULTANT's current Schedule of Charges) for the additional charges associated with maintaining its work force for CLIENT's benefit during the delay, or at the option of CLIENT, for such similar charges that are incurred by CONSULTANT for demobilization and subsequent re-mobilization.

Except for the foregoing provision, neither party shall hold the other responsible for damages or delays in performance caused by acts of God or other events beyond the control of the other party or that could not have been reasonably foreseen and prevented. Delays within the scope of this paragraph which cumulatively exceed forty-five (45) days are deemed a **CHANGED CONDITION** under the Agreement.

**Notification and Reporting**

CLIENT shall be solely responsible for notifying all appropriate federal, state, municipal or other governmental agencies of the existence of any hazardous, toxic or dangerous materials located on or in the Project site, or discovered during the performance of the Agreement.

**Use of Reports**

All reports of CONSULTANT, whether written or oral, and all opinions rendered by CONSULTANT are for the sole use of CLIENT. They are not to be provided to any other person or entity without the express written consent and authorization of CONSULTANT. No other party other than CLIENT may rely upon any reports supplied by CONSULTANT under the Agreement, without the express written consent and authorization of CONSULTANT. CLIENT shall make no representations to any third party that would lead that party to rely upon any reports supplied by CONSULTANT under the Agreement, without the express written consent and authorization of CONSULTANT. Moreover, CLIENT shall not use CONSULTANT's name in any offering circular, prospectus, annual report, financial statement or other similar material. CLIENT shall defend and indemnify CONSULTANT from and against all claims, damages, liability and expenses, including attorneys' fees, arising out of any such misuse of CONSULTANT's reports and name.

**Confidentiality**

Documents, reports, disclosures and other information of any nature and description which CLIENT supplies to or makes available to CONSULTANT or which CONSULTANT discovers or develops in performance of the Services under the Agreement shall be deemed confidential. CONSULTANT shall not disclose same without CLIENT's written authorization, except to the extent that information is in the public domain or is required by law or under CONSULTANT's professional obligations to be disclosed.

**Ownership and Maintenance of Documents**

CLIENT acknowledges that CONSULTANT's reports, boring logs, maps, and other similar documents are instruments of CONSULTANT's professional services, and they are not products. Unless otherwise specified in the Agreement and provided that CONSULTANT has been fully paid for the services rendered, CLIENT shall have the right to use such documents for purposes reasonably contemplated by the parties. CONSULTANT shall have the right, but shall not be obligated, to retain copies of all such materials and shall have the right to use same for any purpose, unless such use would be expected to cause unreasonable harm to CLIENT. CLIENT shall specify in advance and in writing if CLIENT desires CONSULTANT to maintain such materials for an extended period, and CLIENT agrees to pay for all such extra costs. CONSULTANT retains the right of ownership regarding any patentable concepts or copyrightable materials arising from any services provided under the Agreement.

CLIENT shall not re-use any materials prepared in connection with the Agreement for extension of this Project or for any other Project without CONSULTANT's written authorization. CLIENT shall defend and indemnify CONSULTANT from and against all claims, damages, liability and expenses, including attorneys' fees, arising out of such unauthorized re-use.

**Payment**

CONSULTANT will submit invoices on a periodic basis to CLIENT, and the invoices will be due upon receipt by CLIENT. A late payment charge of 1.5% per month will apply to all invoices not paid within thirty (30) days of mailing by CONSULTANT. CLIENT agrees that untimely payment of any invoice constitutes a material breach of the Agreement.

**Notices**

All notices and communications from the CLIENT shall be to CONSULTANT's designated Project Manager or Principal-In-Charge. Verbal communications shall be confirmed in writing.

**Alternative Dispute Resolution**

All claims or disputes between CONSULTANT and CLIENT arising out of or in any way related to the Agreement will be submitted to "alternative dispute resolution" (ADR) such as non-binding mediation, before and as a condition precedent to other remedies provided by law. Either party may demand ADR by serving a written notice that states the essential nature of the dispute and the amount of time or money claimed. The notice shall also indicate that the dispute is to be mediated within sixty (60) days of service of the notice. The mediation shall be administered by the American Arbitration Association or by such other person or organization as the parties may agree upon. No action or lawsuit may be commenced unless the mediation does not occur within ninety (90) days after service of notice, the mediation occurred but did not resolve the dispute, or a statute of limitation would elapse if suit was not filed prior to sixty (60) days after service of notice.

**Attorneys' Fees**

Should CONSULTANT initiate any action under the Agreement, CLIENT shall pay, in addition to any fees and costs owed, all reasonable attorneys' fees and legal costs incurred by CONSULTANT in such action.

**Governing Law**

The laws of the State of California shall govern the rights and obligations of the parties under the Agreement, including the interpretation of the Agreement. If any part of the Agreement is adjudged to be invalid or unenforceable, such invalidity shall not affect the full force and effect of the remainder of the Agreement.

**Entire Agreement and Modifications**

The Agreement and these Terms For Agreement For Environmental Consulting Services, including attachments incorporated therein by reference, represents the entire agreement and understanding between the parties, and any negotiations or prior agreements are intended to be integrated and to be superseded by the Agreement and by these Terms For Agreement For Environmental Consulting Services, unless otherwise expressly specified by the Agreement.

Any modification to the Agreement shall be in writing and signed by authorized representatives of the parties.



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

June 18, 1993  
StID # 523

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

Mr. Dave Robinson  
American Brass and Iron Foundry  
7825 San Leandro St.  
Oakland CA 94621

**Re: Comment on April 1993 Groundwater Investigation Report  
for AB & I, 7825 San Leandro St., Oakland CA 94621**

Dear Mr. Robinson:

Thank you for submitting the above referenced report. It was received just hours after I had written and sent a request for it. I have completed my review of this report including the recommendations of your consultant, BSK. Our office agrees with their recommendations that additional investigation is warranted in the areas surrounding MW-2 and MW-4, the former trichloroethane and 550 gallon gasoline tanks respectively. Our office is willing to observe the trend of diesel concentration at MW-1 at this time through quarterly monitoring.

The soil boring sample taken from MW-2 (downgradient to the TCA tank) detected 63ppm gasoline, 140 ppm diesel and 3500 ppm TOG. Though the origin of these compounds may not be tank related, unless background levels of these materials are shown to exist within the site or the immediate area, these soil contaminants must be defined to low levels within the area around the former tank as well as defining their groundwater concentrations if any. It was noticed that volatile halogenated compounds though not reported in the analysis summary section were indeed run on this boring. However, Method 8270 for semi-volatiles was apparently not run. Recall a number of semi-volatile compounds were detected in the initial samples from the tank removal. The halogenated compounds found in the groundwater sample, though under State and EPA action limits, will need to be monitored on a quarterly basis. It was noticed that the action limit for 1,1-DCA was reported to be 0.5ppb when it actually is 5ppb.

The soil boring from MW-4 at 14.5' detected 2100 ppm gasoline and detectable concentrations of BTEX. The groundwater sample from MW-4 detected BTEX and 1800ppb gasoline. It will be therefore necessary to determine the extent of soil and groundwater contamination. The 0.058ppb of total lead reported in the groundwater sample from MW-4 is actually 0.058 ppm, exceeding the MCL for lead of 0.05ppm, therefore you will need to continue monitoring for lead as well as TPHg and BTEX.

4/1/93  
mon.  
event

Last  
minutes  
3/94

Mr. Dave Robinson  
AB&I  
StID # 523  
June 18, 1993  
Page 2.

Please provide comment to the above items and detail how the extent of soil and groundwater contamination will be determined. You are also requested to give the status of the all the stockpile soils generated from the four tank pulls performed at this site. If soils have been remediated or disposed, please provide documentation of this. If not, please give an estimate as to their future disposition. Please provide your comment to our office **within 45 days or by August 2, 1993.**

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan  
Hazardous Materials Division

cc: G. Jensen, Alameda County District Attorney Office  
P. Lee, DTSC, 700 Heinz Ave., Suite 200, Berkeley,  
CA 94700-2737  
T. Berger, BSK & Associates, 1181 Quarry Lane, Blding 300,  
Pleasanton, CA 94566  
E. Howell, files

3-7825SL



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

June 17, 1993  
StID # 523

DEPARTMENT OF ENVIRONMENTAL HEALTH  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program  
80 Swan Way, Rm 200  
Oakland, CA 94621  
(510) 271-4530

Mr. Dave Robinson  
American Brass and Iron Foundry  
7825 San Leandro St.  
Oakland CA 94621

**Re: Provision of Report for the Installation and Sampling of  
Monitoring Wells at 7825 San Leandro St., Oakland CA,  
94621, ABI.**

Dear Mr. Robinson:

Through a recent conversation with Mr. Tim Berger of BSK, our office was made aware that monitoring wells had been installed at the above referenced site. According to my November 25, 1992 letter to you, our office was to be contacted 48 working hours in advance of this action to be present to witness this activity if at all possible. It seems that I was not informed of the well installations. Nevertheless, our office requests that a copy of the monitoring well installation report be sent to my attention **within 30 days or by July 19, 1993.**

You should be aware that Section 2652 11 (d) of Title 23 California Code of Regulations requires the submittal of reports to the Local Implementing Agency every three months or at more frequent intervals which at a minimum give the results of all investigations and corrective actions.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
P. Lee, DTSC, 700 Heinz Ave., Suite 200, Berkeley, CA  
94700-2737  
E. Howell, files

2-7825Rep

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

February 10, 1993  
StID #523

American Brass and Iron  
Mr. Dave Robinson  
7825 San Leandro St.  
Oakland CA 94621

**Re: List of Parameters to be Analyzed in Monitoring Wells at  
American Brass and Iron, 7825 San Leandro St., Oakland 94621**

Dear Mr. Robinson:

This letter serves to summarize our conversation today regarding the parameters to be analyzed on the monitoring wells to be installed at the above site. The wells downgradient to the gasoline tanks and diesel tank should be analyzed as described on page 5 of BSK and Associates' workplan dated November 16, 1992. For the well downgradient to the TCA tank, you should analyze soil and water samples for chlorinated hydrocarbons, Total Petroleum Hydrocarbons as gasoline and BTEX, Oil and Grease and Semi-volatiles by Method 8270.

Our office is aware of your concern that the entire area may be heavily industrialized and thus contaminated. After reviewing your groundwater monitoring results, you may choose to verify this claim and propose an alternate method of compliance. Our office will consider this approach on a site specific basis.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
R. Hiett, RWQCB  
T. Berger, BSK & Associates, 1181 Quarry Lane, Blding 300,  
Pleasanton, CA 94566  
*E. Howell, files EJA*  
Mon-7825



## AMERICAN BRASS & IRON FOUNDRY

7825 San Leandro Street • Oakland, CA 94621 • (510) 632-3467  
Fax No. (510) 632-8035

February 17, 1993

Mr. Barney Chan  
Hazardous Materials Specialists  
ALAMEDA COUNTY HEALTH  
CARE SERVICES AGENCY  
80 Swan Way, Rm 200  
Oakland, CA 94621

Re: Initial Testing Requirements for the Monitoring Well located  
at the Previous 1,1,1 Trichloroethane UST site.

Dear Mr. Chan:

In response to our phone conversation last Tuesday, the following information should clarify and summarize any issues regarding the testing parameters for the monitoring well located at the previous 1,1,1 Trichloroethane UST site.

Based upon the UST in question was used as storage for transfer solvents (1,1,1 TCA), the main focus on the installation of the monitoring well at this site is complying with requirements specified in the Tri-Regional guidelines for UST removal procedures. As indicated by our closure report, chlorinated solvents in the ground water were found to be present, requiring additional water testing to adequately characterize the potential contamination levels, if any, for the UST site.

As you are aware a tar substance was observed during the initial excavation, justifying additional testing to characterize the material for potential impact on the ground water. The results of the investigation determine the material to be basically insoluble in water and of an inert nature, demonstrating properties similarly characterized to asphalt. Part of the initial investigation included testing for Total Petroleum Hydrocarbons - gas. Detectable levels of TPH - gas were indicated by the water test results. Based upon the laboratory results of the tar substance, it would appear the levels detected for gas were independent of the material discovered.



I hope this information will suffice to fulfill your requirements for completing this portion of the project. If you have additional questions or concerns please feel free in contacting me at (510) 632 - 3467, ext. 211.

Sincerely,

Dave Robinson  
Environmental Engineering Manager

cc: T. Berger, BSK & Associates  
R. Hiatt, RWQCB



#### ACHCS CONCERN

It is assumed that the reason you are proposing a four inch well near the former TCA tank pit is that groundwater treatment will likely be required. To this end, please inform our office what type of groundwater treatment and associated equipment will be used in this well. You should be aware that the screen interval in this well should account for any DNAPLs.

*Screen interval is still important* (4)

First of all, we are not assuming or expecting this area to be contaminated but are merely installing the 4" diameter well as a precaution. The soil samples taken from the UST removal during the subsurface investigation indicate that 1,1,1 Trichloroethane was not present. The fact that the groundwater was not allowed sufficient time for purging before collecting samples would explain the discrepancy between levels of 1,1,1 TCA in the water and soil sample results. The lack of time prevented properly purging the well and was a direct result of the location being a heavy traffic area. It is our expectations that the groundwater sample will be clean and solvent free.

#### ACHCS CONCERN

Task 3 states that one soil boring will be augered to a depth just above the groundwater table at the location depicted on figure 2, Site Plan. It appears that in the figure, the proposed location of the boring is to the north of the former tank, however, residual soil contamination was found in sample T2-S6 to the south of the former tank. Therefore, the soil boring, more logically, should be to the south of the former tank. The extent of additional soil contamination to the west side of the pit (next to the building) still remains in question. Will any attempt to made to determine the extent of this contamination?

This was an oversight on our part and we appreciate your thoroughness in reviewing our workplan. The boring direction will be altered to reflect soil contamination found in sample T2 - S6. This change will determine the extent of contamination sufficiently to characterize the prior UST site.



February 17, 1993  
Pg 2 of 2

As stated in your letter dated February 10, 1993, AB & I agrees to conduct an additional investigation, within reason, for determining any impact created from the tar material. This will include quantifying the initial test results and characterization performed by Fred & Buys Laboratory. If insufficient information is obtain, additional water testing will be performed for those material determined during the initial investigation.

We feel performing EPA method 8010 for chlorinated solvent adequate for determining the potential impact of contamination from the UST site in question. Testing for Petroleum Hydrocarbons as gasoline and BTEX are solely a direct result of the outcome of the initial testing for evaluating the unknown tar substance and in all likely hood independent of the material.

In order to satisfy the ACHS requests, AB & I agree's to conduct the additional testing mentioned above, but feels it could potentially expose the company to liability which reflects past practices for the entire East Oakland region. The remaining testing will be dependent on the outcome of the investigation.

If you have any questions or concerns, please feel free in contacting me at (510) 632 - 3467, ext. 211.

Sincerely,

Dave Robinson  
Environmental Engineering Manager

*I hope this means AB + I will be running 8010 CAC, TPHg + BTEX plus 8270 if quantification not determined by Fred + Buys.*



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

November 25, 1992  
STID # 523

Mr. Dave Robinson  
American Brass and Iron Foundry  
7825 San Leandro St.  
Oakland CA 94621

Re: Response to Work Plan for Shallow Soil and Groundwater  
Investigation at American Brass and Foundry,  
7825 San Leandro St., CA 94621

Dear Mr. Robinson:

Our office has received and reviewed the November 16, 1992 work plan for soil and groundwater investigation for the above site as provided by BSK & Associates. The general approach of installing one monitoring well in the assumed downgradient location relative to the former tank locations is acceptable. However, our office has the following concerns which still need to be addressed:

1. Task 1 states that a work plan which describes the rationale and methods to be used in the field investigation along with addressing other County concerns including copies of manifests, status of excavated soil and treated and disposed groundwater will be written. When will this portion of the workplan be provided to this office?
2. It is assumed that the reason you are proposing a four inch well near the former TCA tank pit is that groundwater treatment will likely be required. To this end, please inform our office what type of groundwater treatment and associated equipment will be used in this well. You should be aware that the screen interval in this well should account for any DNAPLs.
3. Task 3 states that one soil boring will be augered to a depth just above the groundwater table at the location depicted on Figure 2, Site Plan. It appears that in the figure, the proposed location of the boring is to the north of the former tank, however, residual soil contamination was found in sample T2-S6 to the south of the former tank. Therefore, the soil boring, more logically, should be to the south of the former tank. The extent of additional soil contamination to the west side of the pit (next to the building) still remains in question. Will any attempt be made to determine the extent of this contamination?

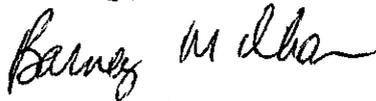


Mr. Dave Robinson  
STID # 523  
American Brass and Iron  
November 25, 1992

Please provide a written response to the above issues **within 30 days** of receipt of this letter. You may proceed in the installation of wells but you should notify our office within 48 working hours prior to this activity should we choose to witness the work.

You may contact me at (510) 271-4530 should you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
R. Hiett, RWQCB  
T. Berger, BSK & Associates, 1181 Quarry Lane, Bld 300,  
Pleasanton, CA 94566  
E. Howell, files

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Recd 11/19/92 ?  
↓

821  
**AMERICAN BRASS & IRON FOUNDRY**

7825 San Leandro Street • Oakland, CA 94621 • (510) 632-3467  
Fax No. (510) 632-8035

November 18, 1992

Mr. Barney Chan  
Alameda County Health Care Services  
Department of Environmental Health  
80 Swan Way, Rm. 200  
Oakland, CA 94621

Dear Mr. Chan:

Please find enclosed AMERICAN BRASS & IRON's work plan for subsurface investigation at 7825 San Leandro Street, Oakland, California.

AB&I chose BSK & Associates as the investigation consultant/contractor based on their ability and experience for performing the required job function. BSK & Associates offer full service for this type of subsurface investigation and should prove a benefit in this portion of the project.

Most of the information you request in your letter, dated October 2, 1992, can be found in each individual underground tank removal report. Any missing information was incorporated into the attached work plan. We look forward to completing this portion of the project.

If you have comments or require additional information, please feel free to contact me at (510) 632-3467 ext. 211.

Sincerely,

Dave Robinson  
Environmental Engineering Manager

DR/lp

Enclosure

cc: Alex Y. Eskandare, P.E.  
BSK & Associates  
Rich Hiatt, RWQCB



## AMERICAN BRASS & IRON FOUNDRY

7825 San Leandro Street • Oakland, CA 94621 • (510) 632-3467  
Fax No. (510) 632-8035

October 28, 1992

Mr. Barney Chan  
Alameda County Health  
Care Services  
Department of Environmental Health  
80 Swan Way, Rm 200  
Oakland, CA 94621

Dear Mr. Chan:

In response to your letter dated October 2, 1992, American Brass and Iron will respectively fulfill your request in our work plan for the investigation of subsurface soil/groundwater contamination for all sites in questions. We are actively seeking quotes from various consultants for the completion of this portion of the project, including the construction of all on site monitoring wells. It is our intention to meet all deadlines imposed by the ACHCS in order to complete the project in accordance with state and local regulatory requirements.

In your letter a couple of points were made which I feel a response is appropriate. The first pertaining to sampling without prior notification. In response, it was our understanding during our conversation on Wednesday, June 3, 1992, we agreed the remediation excavation would probably continue to Friday, June 5, 1992 at which time soil and groundwater samples would be taken. Due to the uncertainty of the excavation efforts it was our impression that your office needed to be contacted but you may or may not be present during the sampling and no formal requirements were necessary in order to proceed with the sampling procedures. We attempted to contact you on Thursday and again on Friday before sampling proceeded, but were told you were unavailable. In each instance a message was left stating our intention and the estimated time for conducting sampling. Throughout the UST removal process AB&I has striven to complete each tank removal as thoroughly as possible and in most cases using over excavation techniques in attempt to eliminate all potential contamination. Your observations on the last tank removal would in all likely hood reinforce our dedication.

As you pointed out certain samples indicated discrepancies between soil and water contamination levels. It is our opinion where these discrepancies occurred, were more than likely a result of sampling directly after the over excavation process. As you well know during the UST removal, the excavation process typically commingles the basin water with the excavated contaminated soil. The water acting as a solvent becomes contaminated. Without allowing time for the water to purge or flush the water sample can potentially indicate a water quality of higher magnitude.

I look forward to finalizing this portion of the project and hope we maintain a good working relationship for the remainder of the project. If you have any questions pertaining to this project please feel free to contact me at (510) 632-3467 ext. 211.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dave Robinson".

Dave Robinson  
Environmental Engineering Manager

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

October 2, 1992  
STID # 523

Mr. Dave Robinson  
American Brass and Iron Foundry  
7825 San Leandro St.  
Oakland CA 94621

Re: Request for Work Plan for Subsurface Investigation at  
American Brass and Iron Foundry (AB&I),  
7825 San Leandro St., Oakland 94621

Dear Mr. Robinson:

Thank you for the submission of the underground tank closure report for the removal of the 12,000 gallon diesel fuel tank. As you stated in the report this concludes the series of tank removals at this site. At this time, our office requests a work plan for the investigation of subsurface soil/groundwater contamination for the entire site. As you are aware, there were verified releases of petroleum and/or solvents at the four former tank sites.

I would like to summarize each of the four tank removals while giving comment and posing questions to be answered in your work plan submittal.

On 8/8/91 Mr. Scott Seery of this office witnessed the removal a 8000 gallon gasoline tank. There was water in the excavation pit. It was sampled and the analytical results indicated 30 mg/l TPHg and 0.313, 0.26, 2.3 and 14 mg/l BTEX respectively. An initial soil sample, T1N-10.5 indicated 820 ppm TPHg and 40 and 120 ppm ethyl benzene and xylenes respectively. It appears that overexcavation at this location was successful in removing all but low levels of petroleum contamination. Our office requests a copy of the receipt for the disposal of the 2-55 gallon drums of rinsate generated during the removal. Our office also requests a copy of the manifest for the underground tank. Much of the contaminated water found during the removals of the tanks, I understand, was treated on-site through your company's water treatment system and then disposed of into the storm drain. Please verify that the Regional Water Quality Control Board, RWQCB, was notified and approved of such activities. A minimum of one monitoring well will be required in the verified down-gradient location, within 10 feet of the final excavation perimeter, to evaluate groundwater impact.

Mr. Dave Robinson  
AB&I  
STID #523  
October 2, 1992  
Page 2.

On 8/26/91 Mr. Dennis Byrne of our office witnessed the removal of a 550 gallon gasoline tank. The initial soil results from the north end of the tank indicated Total Petroleum Hydrocarbons as gasoline, TPHg, in the amount of 2,000 ppm. Overexcavation was performed however two areas were not able to be excavated to non-detectable levels due to physical constraints, ie to the northwest and to the south of the original tank pit.

Levine-Fricke, your consultant, recommended the determination of the lateral and vertical extent of contamination through soil borings or a soil-gas survey and the installation of a minimum of one monitoring well in the appropriate downgradient location. Our office requests a copy of the manifest for the disposal of this tank. Please account for the stockpile soils generated from this excavation and for the soil used to backfill the pit.

On 10/3/91 Mr. Barney Chan of this office witnessed the removal of a 8000 gallon 1,1,1-trichloroethane, (1,1,1-TCA), tank. Although the soil samples taken around the tank did not indicate any solvent contamination, the soil sample, T3-N-10, did show 500 mg/kg TPHg. In addition, a water sample taken from the pit showed 22 ppm 1,1,1-TCA, 4.9ppm 1,1-dichloroethane, 0.7 ppm chloroethane and 11 ppm TPHg and 0.13, 0.31, 0.26, 2.2 mg/l BTEX respectively. As you pointed out in the tank closure report, another significant contaminant noticed was that of a tar-like petroleum substance oozing from the north side of the pit. Although the expert opinion of Friedman and Bruya state that this substance would be water insoluble, it will be necessary to determine the amounts of oil and grease, semi-volatiles and any other petroleum hydrocarbon which this material contributes to the groundwater. The various semi-volatiles detected will need to be quantified to determine if any MCLs or other action limits are exceeded. The MCLs of both 1,1,1-TCA and 1,1-DCA were exceeded by 100-1000 fold and therefore some type of water treatment will be necessary to reduce their concentrations in groundwater. Our office requests an accounting of the stockpiled soils generated at this tank removal along with those soils used for backfilling the pit.

halogenated  
soils?  
exist

It was noticed that you authored both closure reports for the solvent and the diesel tank removals. Your knowledge and expertise in subsurface investigations is noted but you should be aware that our office requires the signature and seal of either a Registered Geologist, Certified Engineering Geologist or a Registered Civil Engineer for those individuals evaluating or making recommendations of a geologic nature.

Mr. Dave Robinson  
AB&I  
STID # 523  
October 2, 1992  
Page 3.

On 6/3/92, Barney Chan witnessed the removal of a 12000 gallon diesel tank, as the last of a series four tank removals. Obvious diesel spillage was noticed floating on the top of the water in the pit. In fact, the analysis of this water sample showed 6.8 mg/l TPHd. As mentioned in your report, the soil contamination was extensive and it was necessary to delay the normal soil sampling activities. It was unfortunate that our office was not notified about witnessing the samplings after overexcavation. The field notes of Mr. Michael Stoll of Levine-Fricke states that you said the County was not needed to witness the sampling. I believe I made a point on 6/3/92 that I be contacted to witness the soil sampling after overexcavation was performed. This is a procedure common to our office. In the event that I personally could not be available, another staff member would likely be present to take my place. As mentioned in your report, there seems to be an ambiguity in the soil and groundwater results taken. That is, the water sample contained 6.8 ppm TPHd while the soil samples were all less than this concentration. Another field note of Mr. Stoll's states that the backfill for the pit was material which was not ND but that you stated the results were "good enough". Please give the status of the excavated soils and the analytical results of the soils used for backfilling the pit. In addition, our office requests copies of signed analytical reports for all results reported for this tank removal.

Enclosed please find a copy of Appendix A, a document from the RWQCB, which states the general contents of an initial workplan for subsurface investigation. You may use this as a guide. Please submit an appropriate workplan to address the four areas of your site within **45 days** of receipt of this letter.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). All workplans, analytical results or reports should be sent to our office and to that of the RWQCB to the attention of Mr. Rich Hiett. Their address is 2101 Webster St., Suite 500, Oakland CA 94612. Be aware that failure to submit the requested documents may subject AB&I to civil liabilities. In addition, please be aware that Section 25298 (c) 4 of the California Health and Safety Code (CH&SC) states that no person shall close an underground tank unless that person has taken steps to demonstrate to the appropriate agency that the site has been investigated to determine if there are any present or past releases and if so that appropriate corrective or remedial actions have been taken. Civil penalties of up to \$5000 per day per each tank which the owner or operator fails to properly close are allowed by Section 25299 (5).

Mr. Dave Robinson  
AB&I  
STID # 523  
October 2, 1992  
Page 4.

You may contact me at (510) 271-4350 should you have any questions regarding this letter.

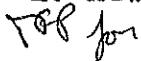
Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

enclosure (Mr. Robinson only)

cc: M. Thomson, Alameda County District Attorney Office  
R. Hiatt, RWQCB  
J. Sturman, Levine-Fricke, 1900 Powell St., 12th Floor,  
Emeryville, CA 94608  
E. Howell, files



ABI-wp



8000 gal Gasoline Tank



# EVERGREEN ENVIRONMENTAL SERVICES

A DIVISION OF CALIFORNIA OIL RECYCLERS, INC.

## INVOICE 266281

6880 SMITH AVE., NEWARK, CA 94560  
(800) 972-5284 EPA ID# CAD980695761

JOB LOCATION		BILLING INFORMATION		DATE: 9/6/92
CUSTOMER	NAME	NAME	P.O.#	
	ADDRESS	ADDRESS	CUSTOMER NO.	
	CITY STATE ZIP CO	CITY STATE ZIP CO	PHONE NO.	
	AMERICAN BRASS WORK			
	7825 SAN JUAN BLVD		AMB01	
	OAK CA 94621		(510) 632-3407	

PLEASE PAY FROM THIS INVOICE

TERMS: NET 7 DAYS

PRODUCT	MANIFEST #	GALLONS	PRICE	AMOUNT
WASTE PETROLEUM OILS (COMBUSTIBLE) LIQUID NA1270	92096190	75	1.85	138.75
WASTE ANTIFREEZE (NONCOMBUSTIBLE) LIQUID UN132	OILY WATER			
HAZARDOUS WASTE LIQUID ORMEL UN189				
WASTE OIL WITH >1000 PPM HALOGENS NA1270				
OTHER:				

TSDF EVERGREEN OIL, INC. (415) 795-4400  
6880 Smith Ave. EPA ID# CAD980887418  
Newark, CA

TOTAL CHARGES 138.75

I CERTIFY THAT THE ABOVE AMOUNTS AND INFORMATION TO BE CORRECT

DRIVER: [Signature] ROUTE # [Blank] DRIVER SIGNATURE: [Signature] GENERATOR'S SIGNATURE: [Signature]



**EVERGREEN  
ENVIRONMENTAL  
SERVICES**

6880 SMITH AVE., NEWARK, CA 94560  
(800) 972-5284 EPA ID# CAD980695761

A DIVISION OF CALIFORNIA OIL RECYCLERS, INC.

**INVOICE 215068**

*1 test*

JOB LOCATION				BILLING INFORMATION				DATE: <i>8-21-91</i>	
<b>CUSTOMER</b>	NAME <i>American Brass &amp; Iron</i>				NAME <i>Same</i>				P. O. #
	ADDRESS <i>7825 San Leandro St.</i>				ADDRESS				CUSTOMER NO.
	CITY <i>Oak</i>	STATE <i>CA</i>	ZIP <i>94671</i>	CO <i>01</i>	CITY	STATE	ZIP	CO	PHONE NO. <i>(415) 6323467</i>

**PLEASE PAY FROM THIS INVOICE**

**TERMS: NET 7 DAYS**

PRODUCT	MANIFEST #	GALLONS	PRICE	AMOUNT
WASTE PETROLEUM OILS COMBUSTIBLE LIQUID NA1270 <i>w/tp water</i>	<i>89770305</i>	<i>50</i>		
WASTE ANTIFREEZE NONCOMBUSTIBLE LIQUID UN1132				
HAZARDOUS WASTE LIQUID ORM-E UN9189				
WASTE OIL WITH > 1000 PPM HALOGENS NA1270				
OTHER: <i>1 test</i>				

TSDF EVERGREEN OIL, INC. (415) 795-4400  
6880 Smith Ave EPA ID # CAD980887418  
Newark, CA

*Reg 550 gal tank* TOTAL CHARGES *80<sup>00</sup>*  
*for Underground Tank Removal*

I CERTIFY THAT THE ABOVE AMOUNTS AND INFORMATION TO BE CORRECT.

*Rickano 05* DRIVER ROUTE # DRIVER SIGNATURE *John P. [Signature]* GENERATOR'S SIGNATURE

... designed for use on elite (12-ditch typewriter).

**FORM HAZARDOUS  
WASTE MANIFEST**

1. Generator's US EPA ID No. **C1A1D10104717111618**  
Manifest Document No. **01010102**

2. Page 1 of 1  
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address  
**AMERICAN BRASS AND IRON FOUNDRY  
7825 San Leandro Street, Oakland, CA. 94621**

A. State Manifest Document Number  
**90546775**

5. Transporter 1 Company Name  
**H & H Ship Service Company**

C. State Transporter's ID **200552**  
D. Transporter's Phone **(415) 543-4835**

7. Transporter 2 Company Name

E. State Transporter's ID  
F. Transporter's Phone

9. Designated Facility Name and Site Address  
**H & H Ship Service Company  
220 China Basin Street  
San Francisco, CA 94107**

G. State Facility's ID  
**C1A1D10104717111618**  
H. Facility's Phone  
**(415) 543-4835**

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)  
**a. RESIDUE GASOLINE TANK  
NON-RCRA HAZARDOUS WASTE SOLID**

12. Containers No. Type  
**01011 TIP**  
13. Total Quantity  
**010151510**  
14. Unit Wt/Vol  
**P**  
I. Waste No.  
State **512**  
EPA/Other

b.  
c.  
d.

State  
EPA/Other  
State  
EPA/Other  
State  
EPA/Other

J. Additional Descriptions for Materials Listed Above  
**EMPTY 550 gallon tank last containing gasoline.  
Tank inerted with dry ice for transport.  
  
PROFILE #A1119**

K. Handling Codes for Wastes Listed Above  
a. **01**  
b.  
c.  
d.

15. Special Handling Instructions and Additional Information  
**JOB #8162  
24 Hr. Emergency Contact: H & H #(415) 543-4835  
APPROPRIATE PROTECTIVE CLOTHING AND RESPIRATOR**

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.  
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name **John P. Ehringer** Signature *John P. Ehringer* Month Day Year **10 8 21 6 9 1**

17. Transporter 1 Acknowledgement of Receipt of Materials  
Printed/Typed Name **MARTIN J. COSTELLO** Signature *Martin J. Costello* Month Day Year **10 8 21 6 9 1**

18. Transporter 2 Acknowledgement of Receipt of Materials  
Printed/Typed Name  
Signature  
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.  
Printed/Typed Name **Christopher Valera** Signature *Christopher Valera* Month Day Year **08 26 91**

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8302, WITHIN CALIFORNIA CALL 1-800-852-7550

GENERATOR

FACILITY

Do Not Write Below This Line



**EVERGREEN  
ENVIRONMENTAL  
SERVICES**

A DIVISION OF CALIFORNIA OIL RECYCLERS, INC

**INVOICE 256763**

6880 SMITH AVE., NEWARK, CA 94560  
(800) 972-5284 EPA ID# CAD980695761

JOB LOCATION				BILLING INFORMATION				DATE:	
<b>CUSTOMER</b>	NAME <i>American Brass &amp; Iron</i>				NAME				P. O. #
	ADDRESS <i>7825 S. Leandro Pl</i>				ADDRESS				CUSTOMER NO. <i>AmBR51</i>
	CITY <i>Oakland</i>	STATE <i>CA</i>	ZIP <i>94621</i>	CO	CITY	STATE	ZIP	CO	PHONE NO. <i>(510) 632-3467</i>

**PLEASE PAY FROM THIS INVOICE**

**TERMS: NET 7 DAYS**

PRODUCT	MANIFEST #	GALLONS	PRICE	AMOUNT
WASTE PETROLEUM OILS COMBUSTIBLE LIQUID NA1270	<i>90609760</i>	<i>75</i>		<i>N/C</i>
WASTE ANTIFREEZE NONCOMBUSTIBLE LIQUID UN1132				
HAZARDOUS WASTE LIQUID ORM-E UN9189				
WASTE OIL WITH > 1000 PPM HALOGENS NA1270				
OTHER: <i>WATER OIL</i>		<i>45</i>		<i>83.25</i>

TSDF EVERGREEN OIL, INC. (415) 795-4400  
6880 Smith Ave EPA ID # CAD980887418  
Newark, CA

**TOTAL CHARGES**

*83.25*

I CERTIFY THAT THE ABOVE AMOUNTS AND INFORMATION TO BE CORRECT.

*Roy*      *1628*      *[Signature]*      *John P. [Signature]*  
DRIVER      ROUTE #      DRIVER SIGNATURE      GENERATOR'S SIGNATURE

*12000 GAL DIESEL TANK*

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

Hazardous Materials Division Inspection Form

Site ID# \_\_\_\_\_ Site Name ABFI Today's Date 6/3/92  
 Site Address 7825 San Leandro St EPA ID# \_\_\_\_\_  
 City \_\_\_\_\_ Zip 94621 Phone \_\_\_\_\_

MAX Amt. Stored > 500lbs/55g/200cf? Y N  
 Hazardous Waste generated per month? \_\_\_\_\_

Inspection Categories:

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

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

I.A GENERATOR (Title 22)

- |       |                             |         |
|-------|-----------------------------|---------|
| ___   | 1. Waste ID                 | * 66471 |
| ___   | 2. EPA ID                   | 66472   |
| ___   | 3. > 90 days                | 66508   |
| ___   | 4. Label dates              | 66508   |
| ___   | 5. Biennial                 | 66493   |
| <hr/> |                             |         |
| ___   | 6. Records                  | 66492   |
| ___   | 7. Correct                  | 66484   |
| ___   | 8. Copy sent                | 66492   |
| ___   | 9. Exception                | 66484   |
| ___   | 10. Copies Rec'd            | 66492   |
| <hr/> |                             |         |
| ___   | 11. Treatment               | 66371   |
| ___   | 12. On-site Disp. (H.S.&C.) | 26189.5 |
| ___   | 13. Ex Haz. Waste           | 66570   |
| <hr/> |                             |         |
| ___   | 14. Communications          | 67121   |
| ___   | 15. Aisle Space             | 67124   |
| ___   | 16. Local Authority         | 67126   |
| ___   | 17. Maintenance             | 67120   |
| ___   | 18. Training                | 67105   |
| <hr/> |                             |         |
| ___   | 19. Prepared                | 67140   |
| ___   | 20. Name List               | 67141   |
| ___   | 21. Copies                  | 67141   |
| ___   | 22. Emg. Coord. Trng.       | 67144   |
| <hr/> |                             |         |
| ___   | 23. Condition               | 67241   |
| ___   | 24. Compatibility           | 67242   |
| ___   | 25. Maintenance             | 67243   |
| ___   | 26. Inspection              | 67244   |
| ___   | 27. Buffer Zone             | 67246   |
| ___   | 28. Tank Inspection         | 67259   |
| ___   | 29. Containment             | 67245   |
| ___   | 30. Safe Storage            | 67261   |
| ___   | 31. Freeboard               | 67257   |

Comments:

Witness removal of 12K steel diesel tank  
 Markon Brandle OFP present  
 O<sub>2</sub> 9% CEL, O<sub>2</sub> - 18%  
 J. Ferbringer & D. Robinson of ABFI present  
 Mike Stoll of Love & Truck - Spler.  
 Tank is too wrapped w/considerable wrapping deteriorated  
 Tank has no apparent holes but apparently is considerably dissolved off on the E-end  
 The pit has oil contaminated the water particularly in the east end  
 H&H is hauler, license # 300 933 W  
 Exp. gen 93, Manifest # 91510000  
 Approx. 3-5 drums of oil/water pumped out prior to sampling  
 San Leandro St

I.B TRANSPORTER (Title 22)

- |       |                           |       |
|-------|---------------------------|-------|
| ___   | 32. Applic./insurance     | 66428 |
| ___   | 33. Comp. Cert./CHP Insp. | 66448 |
| ___   | 34. Containers            | 66465 |
| <hr/> |                           |       |
| ___   | 35. Vehicles              | 66465 |
| ___   | 36. EPA ID #s             | 66531 |
| ___   | 37. Correct               | 66541 |
| ___   | 38. HW Delivery           | 66543 |
| ___   | 39. Records               | 66544 |
| <hr/> |                           |       |
| ___   | 40. Name/ Covers          | 66545 |
| ___   | 41. Recyclables           | 66800 |

Bldg

RE tracks

Contact: Dave Robinson  
 Title: \_\_\_\_\_  
 Signature: [Signature]

Inspector: Barney Chan  
 Signature: [Signature]

# ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #26  
Oakland, CA 94621  
(415) 271-4320

## Hazardous Materials Division Inspection Form

②

Site ID# \_\_\_\_\_ Site Name AB+I Today's Date 8/3/92  
 Site Address 7825 Solano St EPA ID# \_\_\_\_\_  
 City \_\_\_\_\_ Zip 94 Phone \_\_\_\_\_

MAX Amt. Stored > 500lbs/55g/200cf?  Y  N  
 Hazardous Waste generated per month? \_\_\_\_\_

**Inspection Categories:**

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

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

**I.A. GENERATOR (Title 22)**

**Comments:**

- 1. Waste ID \* 66471
- 2. EPA ID 66472
- 3. > 90 days 66508
- 4. Label dates 66508
- 5. Biennial 66493

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- Manifest**
- 6. Records 66492
- 7. Correct 66484
- 8. Copy sent 66492
- 9. Exception 66484
- 10. Copies Rec'd 66492

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- Misc.**
- 11. Treatment 66371
- 12. On-site Disp. (H.S.&C.) 26189.5
- 13. Ex Haz. Waste 66570

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- Prevention**
- 14. Communications 67121
- 15. Aisle Space 67124
- 16. Local Authority 67126
- 17. Maintenance 67120
- 18. Training 67105

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- Confin. Agency**
- 19. Prepared 67140
- 20. Name List 67141
- 21. Copies 67141
- 22. Emg. Coord. Trng. 67144

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- Containers, Tanks**
- 23. Condition 67241
- 24. Compatibility 67242
- 25. Maintenance 67243
- 26. Inspection 67244
- 27. Buffer Zone 67246
- 28. Tank Inspection 67259
- 29. Containment 67245
- 30. Safe Storage 67261
- 31. Freeboard 67257

It is approx 10' x 30' x 13' deep  
 East end soils are a blue-green oily appearance  
 OVA reading of soils from east end give 6 ppm  
 which could mean v. high diesel.  
 AB+I will overexcavate the east end to  
 apparent "clean" purple soil sampling.  
 The water still appears to have a dark  
 floating layer. Will determine what  
 samples (soil and GW) will be taken after  
 overexcavation completed. Apparent clay layer  
 exists approx 4 feet deeper.

**I.B. TRANSPORTER (Title 22)**

- 32. Applic./Insurance 66428
- 33. Comp. Cert./CHP Insp. 66448
- 34. Containers 66465

---

- Manifest**
- 35. Vehicles 66465
- 36. EPA ID #s 66531
- 37. Correct 66541
- 38. HW Delivery 66543
- 39. Records 66544

---

- Conf'ts**
- 40. Name/ Covers 66545
- 41. Recyclables 66800

Rev 6/88

Contact: D. Robinson

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

Signature: Dann Robinson

Inspector: B. Chan

Signature: BChan

# UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I HAVE DISTRIBUTED THIS INFORMATION ACCORDING TO THE DISTRIBUTION SHOWN ON THE INSTRUCTION SHEET ON THE BACK PAGE OF THIS FORM.	
REPORT DATE 05/29/92		CASE #		SIGNED: <i>Barney Chan</i> DATE: 6/3/92	
REPORTED BY	NAME OF INDIVIDUAL FILING REPORT <b>JOHN FEHRINGER</b>		PHONE (510) 632-3467		SIGNATURE <i>John P. Fehringer</i>
	REPRESENTING <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OTHER		COMPANY OR AGENCY NAME <b>AMERICAN BRASS &amp; IRON FOUNDRY</b>		
	ADDRESS <b>7825 SAN LEANDRO STREET OAKLAND, CALIFORNIA 94621</b>				
RESPONSIBLE PARTY	NAME <b>AMERICAN BRASS &amp; IRON</b> <input type="checkbox"/> UNKNOWN		CONTACT PERSON <b>DAVE ROBINSON</b>		PHONE (510) 632-3467
	ADDRESS <b>7825 SAN LEANDRO STREET OAKLAND, CALIFORNIA 94621</b>				
SITE LOCATION	FACILITY NAME (IF APPLICABLE) <b>AMERICAN BRASS &amp; IRON</b>		OPERATOR <b>CLIFF COOPER</b>		PHONE (510) 632-3467
	ADDRESS <b>7825 SAN LEANDRO STREET OAKLAND, CALIFORNIA 94621</b>				
	CROSS STREET <b>77TH AVENUE</b>				
IMPLEMENTING AGENCIES	LOCAL AGENCY AGENCY NAME <b>ALAMEDA COUNTY HEALTH CARE SVCS.</b>		CONTACT PERSON <b>MR. BARNEY CHAN</b>		PHONE (510) 271-4320
	REGIONAL BOARD <b>CALIF. REGNL. WATER QUAL. CONTROL BRD.-SAN FRAN. REGION</b>		CONTACT PERSON <b>MR. EDDY SO</b>		PHONE (510) 464-1255
SUBSTANCES INVOLVED	(1) NAME QUANTITY LOST (GALLONS) <b>REGULAR GASOLINE, UNLEADED GASOLINE</b> <input checked="" type="checkbox"/> UNKNOWN				
	(2) NAME QUANTITY LOST (GALLONS) <b>DIESEL FUEL, 1-1-1 TRICHLOROETHANE</b> <input checked="" type="checkbox"/> UNKNOWN				
DISCOVERY/ABATEMENT	DATE DISCOVERED M M D D Y Y		HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> TANK TEST <input checked="" type="checkbox"/> TANK REMOVAL (S) <input type="checkbox"/> OTHER		
	DATE DISCHARGE BEGAN M M D D Y Y <input checked="" type="checkbox"/> UNKNOWN		METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> REMOVE CONTENTS <input checked="" type="checkbox"/> CLOSE TANK & REMOVE <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> CLOSE TANK & FILL IN PLACE <input type="checkbox"/> CHANGE PROCEDURE <input type="checkbox"/> REPLACE TANK <input type="checkbox"/> OTHER		
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE M M D D Y Y				
SOURCE/CAUSE	SOURCE OF DISCHARGE <input type="checkbox"/> TANK LEAK <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER		CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL <input type="checkbox"/> CORROSION <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER		
	CASE TYPE <input checked="" type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)				
CURRENT STATUS	CHECK ONE ONLY <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED <input type="checkbox"/> POLLUTION CHARACTERIZATION <input type="checkbox"/> LEAK BEING CONFIRMED <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT UNDERWAY <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> REMEDIATION PLAN <input type="checkbox"/> CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY) <input checked="" type="checkbox"/> CLEANUP UNDERWAY				
	CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS) <input type="checkbox"/> CAP SITE (CD) <input checked="" type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> VENT SOIL (VS) <input type="checkbox"/> VACUUM EXTRACT (VE) <input type="checkbox"/> OTHER (OT)				
COMMENTS	THIS UNAUTHORIZED RELEASE FORM IS FOR 4 UNDERGROUND TANKS REMOVED FROM AMERICAN BRASS & IRON FOUNDRY-1-8000 GALLON UNLEADED GASOLINE, 1-550 GALLON REGULAR GASOLINE, 1-8000 GALLON 1-1-1 TRICHLOROETHANE, AND 1-10000 GALLON DIESEL FUEL.				

## INSTRUCTIONS

### EMERGENCY

Indicate whether emergency response personnel and equipment were involved at any time. If so, a Hazardous Material Incident Report should be filed with the State Office of Emergency Services (OES) at 2800 Meadowview Road, Sacramento, CA 95832. Copies of the OES report form may be obtained at your local underground storage tank permitting agency. Indicate whether the OES report has been filed as of the date of this report.

### LOCAL AGENCY ONLY

To avoid duplicate notification pursuant to Health and Safety code Section 25180.5, a government employee should sign and date the form in this block. A signature here does not mean that the leak has been determined to pose a significant threat to human health or safety, only that notification procedures have been followed if required.

### REPORTED BY

Enter your name, telephone number, and address. Indicate which party you represent and provide company or agency name.

### RESPONSIBLE PARTY

Enter name, telephone number, contact person, and address of the party responsible for the leak. The responsible party would normally be the tank owner.

### SITE LOCATION

Enter information regarding the tank facility. At a minimum, you must provide the facility name and full address.

### IMPLEMENTING AGENCIES

Enter names of the local agency and Regional Water Quality Control Board involved.

### SUBSTANCES INVOLVED

Enter the name and quantity lost of the hazardous substance involved. Room is provided for information on two substances if appropriate. If more than two substances leaked, list the two of most concern for cleanup.

### DISCOVERY/ABATEMENT

Provide information regarding the discovery and abatement of the leak.

### SOURCE/CAUSE

Indicate source(s) of leak. Check box(es) indicating cause of leak.

### CASE TYPE

Indicate the case type category for this leak. Check one box only. Case type is based on the most sensitive resource affected. For example, if both soil and ground water have been affected, case type will be "Ground Water". Indicate "Drinking Water" only if one or more municipal or domestic water wells have actually been affected. A "Ground Water" designation does not imply that the affected water cannot be, or is not, used for drinking water, but only that water wells have not yet been affected. It is understood that case type may change upon further investigation.

### CURRENT STATUS

Indicate the category which best describes the current status of the case. Check one box only. The response should be relative to the case type. For example, if case type is "Ground Water", then "Current Status" should refer to the status of the ground water investigation or cleanup, as opposed to that of soil. Descriptions of options follow:

No Action Taken - No action has been taken by responsible party beyond initial report of leak.

Leak Being Confirmed - Leak suspected at site, but has not been confirmed.

Preliminary Site Assessment Workplan Submitted - workplan/proposal requested of/submitted by responsible party to determine whether ground water has been, or will be, impacted as a result of the release.

Preliminary Site Assessment Underway - implementation of workplan.

Pollution Characterization - responsible party is in the process of fully defining the extent of contamination in soil and ground water and assessing impacts on surface and/or ground water.

Remediation Plan - remediation plan submitted evaluating long term remediation options. Proposal and implementation schedule for appropriate remediation options also submitted.

Cleanup Underway - implementation of remediation plan.

Post Cleanup Monitoring in Progress - periodic ground water or other monitoring at site, as necessary, to verify and/or evaluate effectiveness of remedial activities.

Case Closed - regional board and local agency in concurrence that no further work is necessary at the site.

IMPORTANT: THE INFORMATION PROVIDED ON THIS FORM IS INTENDED FOR GENERAL STATISTICAL PURPOSES ONLY AND IS NOT TO BE CONSTRUED AS REPRESENTING THE OFFICIAL POSITION OF ANY GOVERNMENTAL AGENCY

### REMEDIAL ACTION

Indicate which action have been used to cleanup or remediate the leak. Descriptions of options follow:

Cap Site - install horizontal impermeable layer to reduce rainfall infiltration.

Containment Barrier - install vertical dike to block horizontal movement of contaminant.

Excavate and Dispose - remove contaminated soil and dispose in approved site.

Excavate and Treat - remove contaminated soil and treat (includes spreading or land farming).

Remove Free Product - remove floating product from water table.

Pump and Treat Groundwater - generally employed to remove dissolved contaminants.

Enhanced Biodegradation - use of any available technology to promote bacterial decomposition of contaminants.

Replace Supply - provide alternative water supply to affected parties.

Treatment at Hookup - install water treatment devices at each dwelling or other place of use.

Vacuum Extract - use pumps or blowers to draw air through soil.

Vent Soil - bore holes in soil to allow volatilization of contaminants.

No Action Required - incident is minor, requiring no remedial action.

COMMENTS - Use this space to elaborate on any aspects of the incident.

SIGNATURE - Sign the form in the space provided.

### DISTRIBUTION

If the form is completed by the tank owner or his agent, retain the last copy and forward the remaining copies intact to your local tank permitting agency for distribution.

1. Original - Local Tank Permitting Agency
2. State Water Resources Control Board, Division of Clean Water Programs, Underground Storage Tank Program, P.O. Box 944212, Sacramento, CA 94244-2120
3. Regional Water Quality Control Board
4. Local Health Officer and County Board of Supervisors or their designee to receive Proposition 65 notifications.
5. Owner/responsible party.



Proposed

Allan Boscacci  
2825 San Leandro St 94621

DATE: 5/28/92

Reported 10/91

TO : Local Oversight Program

FROM: BC

SUBJ: Transfer of Eligible Oversight Case

Site name: American Brass & Iron Foundry

Address: 7825 San Leandro St city Oak zip 94621

Closure plan attached? Y N DepRef remaining \$

DepRef Project # 612029 STID #(if any) 523

Number of Tanks: 4 removed? 3 Y N Date of removal 8/8/91, 8/26/91, 10/13/91  
gasoline, TCA, TPH med-high

Samples received? Y N Contamination: \_\_\_\_\_

Petroleum Y N Types: Avgas Jet leaded unleaded Diesel  
fuel oil waste oil kerosene solvents

Monitoring wells on site 0 Monitoring schedule? Y N

LUFT category 1 2 3 \* H S C A R W G O

Briefly describe the following:

Preliminary Assessment 3 tanks removed, soil & gw contamination found only defined lateral extent at 8k tank there.

Remedial Action fire need to do this & install mws

Post Remedial Action Monitoring Need to fill out UAR

Enforcement Action \_\_\_\_\_

① 550 gal gasoline tank removed 8/26/91, 2 sple taken T2-N-8.5 had 2000 ppm TPHg & T2-S-6 had 410 ppm TPHg, Over excavation performed & contamination still exists in west & south walls need to further delineate soil contamination & install wells;

② removed a 8k-1,11-TCA tank on 10/13/91, also uncovered a tail like material emanating on the north side of tank water pit contained 22 ppm TCA, 4.9 ppm 1,1-DCA; 11 ppm TPHg

③ 8k gasoline tank removed 8/8/91  
soil sple - T1N-10.5 - 820 ppm TPHg  
water sample - 30 mg/l TPH, BTEX .31, .26, 2.3 & 14 mg/l.  
have overexcavated to low levels

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY  
 DEPARTMENT OF ENVIRONMENTAL HEALTH  
 HAZARDOUS MATERIALS DIVISION  
 80 SWAN WAY, ROOM 200  
 OAKLAND, CA 94621  
 PHONE NO. 415/271-4220

Project Specialist (print) Barney Chen

OK Start with the following milestones:

Needs:

- ① Fill out ATB forms
- ② Fill out reimbursement page
- ③ Submit H+S plan
- ④ Verify w/ Contractor's license Board (916) 366-5205 that property owner may remove tank w/o appropriate license

DEPARTMENT OF ENVIRONMENTAL HEALTH  
 470 - 27th Street, 14th Floor  
 Oakland, CA 94612  
 Telephone: (415) 874-7237

These plans have been reviewed and found to be acceptable and essentially meet the requirements of State and local health laws. Changes to your plans indicated by Department are to assure compliance with State and local laws. The project proposed herein is now released for issuance of any required building permits for construction. One copy of these acceptance plans must be on the job and available to all contractors and craftsmen involved with removal.

Any revision or alterations of these plans and specifications must be submitted to the Department and to the Fire and Department of Public Works to determine if such changes meet the requirements of State and local laws. A minimum of 48 hours prior to the start of any removal operations.

- \_\_\_\_\_ Removal of Tank and Piping
- \_\_\_\_\_ Sampling
- \_\_\_\_\_ Final Inspection

Permit to operate is dependent on compliance with accepted plans and all applicable laws and regulations.

**UNDERGROUND TANK CLOSURE PLAN**

**\* \* \* Complete according to attached instructions \* \* \***

1. Business Name AMERICAN BRASS AND IRON FOUNDRY  
 Business Owner ALLAN BOSCACCI

2. Site Address 7825 SAN LEANDRO STREET  
 City OAKLAND Zip 94621 Phone (510) 632-3467

3. Mailing Address 7825 SAN LEANDRO STREET  
 City OAKLAND Zip 94621 Phone (510) 632-3467

4. Land Owner ALLAN BOSCACCI  
 Address 7825 SAN LEANDRO ST. City, State OAKLAND, CA Zip 94621

5. Generator name under which tank will be manifested AMERICAN BRASS AND IRON FOUNDRY

EPA I.D. No. under which tank will be manifested CAD 021774559

6. Contractor SAME AS OWNER  
Address \_\_\_\_\_  
City \_\_\_\_\_ Phone \_\_\_\_\_  
License Type \_\_\_\_\_ ID# \_\_\_\_\_

7. Consultant LEVINE-FRICKE  
Address 1900 POWELL STREET, 12th FLOOR  
City EMERYVILLE Phone (510) 632-3467

8. Contact Person for Investigation  
Name JOHN STURMAN Title SENIOR PROJECT  
Phone (415) 652-4500 GEOTECHNICAL ENGINEER

9. Number of tanks being closed under this plan 1  
Length of piping being removed under this plan APP. 10 FT.  
Total number of tanks at facility 1

10. State Registered Hazardous Waste Transporters/Facilities (see instructions).

\*\* Underground tanks are hazardous waste and must be handled \*\*  
as hazardous waste

a) Product/Residual Sludge/Rinsate Transporter  
Name EVERGREEN ENVIRONMENTAL SVCS. EPA I.D. No. CAD 980695761  
Hauler License No. \_\_\_\_\_ License Exp. Date \_\_\_\_\_  
Address 6880 SMITH ROAD  
City NEWARK State CA Zip 94560

b) Product/Residual Sludge/Rinsate Disposal Site  
Name EVERGREEN ENVIRONMENTAL EPA I.D. No. CAD 980887418  
Address 6880 SMITH ROAD  
City NEWARK State CA Zip 94560

c) Tank and Piping Transporter

Name H & H SHIP SERVICE EPA I.D. No. CAD 004771168  
Hauler License No. 0334 License Exp. Date 1/31/92  
Address 220 CHINA BASIN STREET  
City SAN FRANCISCO State CA Zip 94107

d) Tank and Piping Disposal Site

Name SAME AS TRANSPORTER EPA I.D. No. \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

11. Experienced Sample Collector

Name JOHN STURMAN  
Company LEVINE-FRICKE  
Address 1900 POWELL STREET  
City EMERYVILLE State CA Zip 94608 Phone (510) 652-4500

12. Laboratory

Name BC ANALYTICAL  
Address 1255 POWELL STREET  
City EMERYVILLE State CA Zip 94608  
State Certification No. 1353

13. Have tanks or pipes leaked in the past? Yes [ ] No [X]

If yes, describe. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

14. Describe methods to be used for rendering tank inert

- 1) PRODUCT AND SLUDGE REMOVAL

---

- 2) RINSING PIPING AND TANKS

---

- 3) DRY ICE

---

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

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

15. Tank History and Sampling Information

Tank		Material to be sampled (tank contents, soil, groundwater, etc.)	Location and Depth of Samples
Capacity	Use History (see instructions)		
10,000 GAL.	REGULAR DIESEL STOKEN, INSTALLATION DATE UNKNOWN. PRSENTLY IN SERVICE.	SOIL, GROUNDWATER IF SOIL IS CONTAMINATED OR IF GROUNDWATER IS PRESENT IN THE EXCAVATION.	SOIL-1" INTO NATIVE SOIL WATER - AT STATIC WATER LEVEL IN EXCAVATION. <i>1 siple at each end of tank</i>

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

Excavated/Stockpiled Soil	
Stockpiled Soil Volume (Estimated)	Sampling Plan <i>Stockpile must be characterized pursuant to disposal method</i>

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

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

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

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit
TPH <del>GASOLINE</del> Diesel	EPA <del>5030</del> 3550	EPA METHOD 8015	10 PPM (SOIL) 0.050 PPM (WATER)
BTXE	SAME	EPA METHOD 8020	0.005 PPM(SOIL) 0.005 PPM WATER

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

18. Submit Worker's Compensation Certificate copy

Name of Insurer SELF INSURED TO \$400,000. TRANSAMERICA

INSURANCE COMPANY THEREAFTER

19. Submit Plot Plan (See Instructions)

20. Enclose Deposit (See Instructions)

21. Report any leaks or contamination to this office within 5 days of discovery. The report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report form. (see Instructions)

22. Submit a closure report to this office within 60 days of the tank removal. This report must contain all the information listed in item 22 of the instructions.

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true.

I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel health and safety. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

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

Signature of Contractor

Name (please type) DAVE ROBINSON

Signature *Dave Robinson*

Date 11/27/91

Signature of Site Owner or Operator

Name (please type) ALLAN BOSCACCI

Signature *Allan Boscacci*

Date \_\_\_\_\_

SITE HEALTH AND SAFETY PLAN FOR (company name)

AMERICAN BRASS AND IRON FOUNDRY

SITE 10 000 GAL DIESEL TANK

PROJECT NUMBER —

ORIGINAL SITE HEALTH & SAFETY PLAN: Yes (X) No ( ) REVISION # —

PLAN PREPARED BY JOHN FEHRINGER

DATE 5/20/92

PLAN APPROVED BY \_\_\_\_\_

DATE \_\_\_\_\_

1. KEY PERSONNEL AND RESPONSIBILITIES

PROJECT MANAGER DAVE ROBINSON PHONE # (510) 632-3467

HEALTH AND SAFETY RESPONSIBILITIES ASSESS POTENTIAL

HEALTH AND SAFETY HAZARDS AT SITE, MODIFY HSP IF  
NECESSARY, REQUIRE MEDICAL ATTENTION, IF NECESSARY,  
DENY UNAUTHORIZED ENTRY

SITE HEALTH AND SAFETY OFFICER JOHN FEHRINGER

PHONE # (510) 632-3467

HEALTH AND SAFETY RESPONSIBILITIES INFORM SITE WORKERS OF  
EXPECTED HAZARDS, ORDER SITE EVACUATION OR SHUT  
DOWN, IF NECESSARY, MODIFY HSP, IF NECESSARY, REQUIRE  
MEDICAL ATTENTION, IF NECESSARY, DENY UNAUTHORIZED ENTRY

FIELD TEAM MEMBERS JULIE SHARP, EWALD SCHMIDT,

VICTOR SEVICELA, EDUARDO GONZALEZ



AGENCIES REPRESENTED (fire department, health services, etc.)

ALAMEDA COUNTY HEALTH CARE SERVICES

CITY OF OAKLAND FIRE DEPARTMENT

2

2. JOB HAZARD ANALYSIS

CHEMICAL HAZARDS (INCLUDING HAZARDOUS MATERIALS PRESENT ON SITE) POSSIBLE SOIL CONTAMINATION WITH

DIESEL - BENZENE, TOLUENE, ETHYLBENZENE, XYLENE

CHARACTERISTICS OF MATERIALS LISTED ABOVE

MATERIAL #1 DIESEL FUEL

CORROSIVE ( )    IGNITABLE (X)    TOXIC (X)  
 REACTIVE ( )    VOLATILE (X)    RADIOACTIVE ( )  
 BIOLOGICAL AGENT ( )    GASOLINE VAPOR ( )  
 EXPOSURE ROUTES:    INHALATION (X)    INGESTION (X)  
 EYE CONTACT (X)    SKIN AND MUCOUS MEMBRANE (X)

MATERIAL #2 BENZENE

CORROSIVE ( )    IGNITABLE ( )    TOXIC (X)  
 REACTIVE ( )    VOLATILE (X)    RADIOACTIVE ( )  
 BIOLOGICAL AGENT ( )    GASOLINE VAPOR ( )  
 EXPOSURE ROUTES:    INHALATION (X)    INGESTION ( )  
 EYE CONTACT ( )    SKIN AND MUCOUS MEMBRANE (X)

MATERIAL #3 TOLUENE

CORROSIVE ( )    IGNITABLE ( )    TOXIC (X)  
 REACTIVE ( )    VOLATILE (X)    RADIOACTIVE ( )  
 BIOLOGICAL AGENT ( )    GASOLINE VAPOR ( )  
 EXPOSURE ROUTES:    INHALATION (X)    INGESTION ( )  
 EYE CONTACT ( )    SKIN AND MUCOUS MEMBRANE (X)

MATERIAL #4 ETHYLBENZENE

CORROSIVE ( )    IGNITABLE ( )    TOXIC (X)  
 REACTIVE ( )    VOLATILE (X)    RADIOACTIVE ( )  
 BIOLOGICAL AGENT ( )    GASOLINE VAPOR ( )  
 EXPOSURE ROUTES:    INHALATION (X)    INGESTION ( )  
 EYE CONTACT ( )    SKIN AND MUCOUS MEMBRANE ( )

MATERIAL #5 XYLENE

CORROSIVE ( )    IGNITABLE ( )    TOXIC (X)  
 REACTIVE ( )    VOLATILE (X)    RADIOACTIVE ( )  
 BIOLOGICAL AGENT ( )    GASOLINE VAPOR (X)  
 EXPOSURE ROUTES:    INHALATION (X)    INGESTION ( )  
 EYE CONTACT (X)    SKIN AND MUCOUS MEMBRANE ( )

PHYSICAL AND OTHER HAZARDS \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

HAZARDS OF SPECIFIC TASKS (e. g. cave-ins, explosions, traffic, back injuries)

TASK #1 EXCAVATE SOIL

HAZARDS CAVE-IN, INJURY TO SITE WORKERS

PRECAUTIONARY MEASURES NOBODY ALLOWED IN PIT, MACHINERY A SAFE DISTANCE FROM PIT, CAUTION OPERATING MACHINERY AROUND SITE WORKERS

TASK #2 TRANSFERRING EXCAVATED SOIL

HAZARDS COLLISION WITH SITE WORKERS, COLLISION WITH SURROUNDING TRAFFIC

PRECAUTIONARY MEASURES OPERATE MACHINERY SAFELY, SITE WELL-MARKED WITH CAUTION TAPE, ETC.

TASK #3 BACKFILLING

HAZARDS SAME AS TASKS 1 AND 2

PRECAUTIONARY MEASURES SAME AS TASKS 1 AND 2

TASK #4 \_\_\_\_\_

HAZARDS \_\_\_\_\_

PRECAUTIONARY MEASURES \_\_\_\_\_

TASK #5 \_\_\_\_\_

HAZARDS \_\_\_\_\_

PRECAUTIONARY MEASURES \_\_\_\_\_

3. WORK REQUIREMENTS

MONITORING PLAN (PID for VOC's, CGA, etc.)

PHOTOIONIZATION DETECTOR TO DETECT AMBIENT AIR CONCENTRATIONS OF VOLATILE ORGANIC COMPOUNDS, COMBUSTIBLE GAS ANALYZER TO DETERMINE CONCENTRATION OF COMBUSTIBLE GASES AND OXYGEN IN TANK PRIOR TO REMOVAL

PERSONAL PROTECTIVE EQUIPMENT (hard hats, safety glasses, rubber gloves, respirators for organic vapors, steel toed safety shoes, hearing protection, polyethylene-coated coveralls, etc.)

HARD HATS, SAFETY GLASSES, RESPIRATORS FOR  
ORGANIC VAPORS, RUBBER GLOVES, HEARING  
PROTECTION AS NEEDED

ACTION LEVELS (VOC,s, benzene, LEL, etc.)

IF AMBIENT AIR CONCENTRATION OF VOC'S IN  
BREATHING ZONE > 25PPM, WORK SHOULD TEMP-  
ORARILY STOP UNTIL VOC'S < 25PPM, COMBUSTIBLE  
GASES AS PER FIRE DEPARTMENT REQUIREMENTS

PHYSICAL HAZARDS

FIRE AND EXPLOSION (fire extinguishers, no smoking signs, etc.)

10 POUND, 20 B.C RATED FIRE EXTINGUISHER  
ON SITE, NO SMOKING SIGNS

NOISE (e. g. earplugs around jack hammering, heavy machinery, etc.)

EARPLUGS AROUND JACK HAMMERING

OTHER

EYE WASH IN CORE ROOM

WORK AREA DEFINITION

METHOD OF DESIGNATION (fencing, caution tape, signs, security measures, etc.)

CAUTION TAPE, PORTABLE FENCES AROUND  
PIT, PLANT SECURITY

ENTRY PROCEDURES (requirements for visitors, including entry permission, safety equipment)

DESIGNATED TEAM MEMBER ON SITE AT  
ALL TIMES, PERMISSION REQUIRED FOR  
VISITOR ENTRY

DECONTAMINATION PROCEDURES (PPE, tools, equipment)

CONTAMINATED PERSONAL PROTECTIVE EQUIPMENT,  
TOOLS, EQUIPMENT SHOULD BE CLEANED OR  
DISPOSED OF ACCORDING TO DISPOSAL LAWS.

4. EMERGENCY PROCEDURES

GENERAL INJURIES

- Step 1: Administer first aid, if appropriate.
- Step 2: Obtain outside emergency assistance, if appropriate.
- Step 3: Notify SSO and Project Manager.

TREATMENTS

FIRE: Use fire extinguisher. Activate available alarms if necessary. Call fire department if necessary.

SKIN EXPOSURE: Skin exposure to many toxic materials can often be minimized by washing the affected area with soap and water. Call an ambulance if necessary.

EYE EXPOSURE: Flush eyes with water. Call an ambulance if necessary.

**CHEMICAL SPILL:** Call fire department and National Response Center for Toxic Chemical and Oil Spills.

**INHALATION:** Move victim to fresh air. Call ambulance if necessary.

**SWALLOWING:** Call ambulance service if necessary. Call Poison Control Center for information.

#### EMERGENCY PHONE NUMBERS

Ambulance----- 911

Fire Department----- 911

Police Department----- 911

Hospital (name, address, emergency and other phone)

HUMANA HOSPITAL (510) 357-8450 (EMERGENCY)

13855 EAST 14<sup>th</sup> STREET (510) 357-6500

SAN LEANDRO, CA 94587

National Response Center----- (800) 424-8802

CHEMTREC----- (800) 424-9300

Poison Control Center----- (800) 523-2222

California Office of Emergency Services (800) 852-7550

Regional Water Quality Control Board (805) 549-3147

#### 5. TRAINING PROGRAM

Prior to commencing work activities, a safety briefing will be held to discuss the contents of this health and safety plan as well as any other safety items.

Training also includes appropriate requirements indicated by 29 CFR 1910.120 (e).

#### 6. MEDICAL MONITORING

Appropriate medical monitoring is required as designated by 29 CFR 1910.120 (f).

JF/jf

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

Darney Chen  
 Below, OK 5/28/92 with the following  
 Needs  
 Comments!

- ① Fill out ATB forms
- ② Fill out reimbursement page
- ③ Submit H+S plan
- ④ Verify w/ Contractor's license  
 Board (916) 366-5205 that  
 property owner may remove  
 un tank w/o appropriate  
 license

DEPARTMENT OF ENVIRONMENTAL HEALTH  
 470 - 27th Street, Third Floor  
 Oakland, CA 94612  
 Telephone: (415) 874-7237

Plans have been reviewed and found to be acceptable. Plans must be on the job and to all contractors and craftsmen involved with removal.  
 Plans essentially meet the requirements of State and local laws. Changes to your plans indicated by this Department are to assure compliance with State and local laws. A permit application is now required for issuance of this permit.  
 Plans or alterations of these plans and specifications submitted to this Department and to the Fire and Inspection Department to determine if such plans meet the requirements of State and local laws. This Department at least 48 hours prior to the required inspections:

- \_\_\_\_\_ Removal of Tank and Piping
- \_\_\_\_\_ Sampling
- \_\_\_\_\_ Final Inspection

Permit to operate is dependent on compliance with accepted plans and all applicable laws and regulations.  
 THERE IS A FINANCIAL PENALTY FOR NOT OBTAINING THESE PERMITS

UNDERGROUND TANK CLOSURE PLAN

\* \* \* Complete according to attached instructions \* \* \*

1. Business Name AMERICAN BRASS AND IRON FOUNDRY  
 Business Owner ALLAN BOSCACCI

2. Site Address 7825 SAN LEANDRO STREET  
 City OAKLAND Zip 94621 Phone (510) 632-3467

3. Mailing Address 7825 SAN LEANDRO STREET  
 City OAKLAND Zip 94621 Phone (510) 632-3467

4. Land Owner ALLAN BOSCACCI  
 Address 7825 SAN LEANDRO ST. City, State OAKLAND, CA Zip 94621

5. Generator name under which tank will be manifested AMERICAN BRASS AND IRON FOUNDRY

EPA I.D. No. under which tank will be manifested CAD 021774559



6. Contractor SAME AS OWNER  
Address \_\_\_\_\_  
City \_\_\_\_\_ Phone \_\_\_\_\_  
License Type \_\_\_\_\_ ID# \_\_\_\_\_

7. Consultant LEVINE-FRICKE  
Address 1900 POWELL STREET, 12th FLOOR  
City EMERYVILLE Phone (510) 632-3467

8. Contact Person for Investigation  
Name JOHN STURMAN Title SENIOR PROJECT  
Phone (415) 652-4500 GEOTECHNICAL ENGINEER

9. Number of tanks being closed under this plan 1  
Length of piping being removed under this plan APP. 10 FT.  
Total number of tanks at facility 1

State Registered Hazardous Waste Transporters/Facilities (see instructions).

\*\* Underground tanks are hazardous waste and must be handled \*\*  
as hazardous waste

a) Product/Residual Sludge/Rinsate Transporter  
Name EVERGREEN ENVIRONMENTAL SVCS. EPA I.D. No. CAD 980695761  
Hauler License No. \_\_\_\_\_ License Exp. Date \_\_\_\_\_  
Address 6880 SMITH ROAD  
City NEWARK State CA Zip 94560

b) Product/Residual Sludge/Rinsate Disposal Site  
Name EVERGREEN ENVIRONMENTAL EPA I.D. No. CAD 980887418  
Address 6880 SMITH ROAD  
City NEWARK State CA Zip 94560

c) Tank and Piping Transporter

Name H & H SHIP SERVICE EPA I.D. No. CAD 004771168  
Hauler License No. 0334 License Exp. Date 1/31/92  
Address 220 CHINA BASIN STREET  
City SAN FRANCISCO State CA Zip 94107

d) Tank and Piping Disposal Site

Name SAME AS TRANSPORTER EPA I.D. No. \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

11. Experienced Sample Collector

Name JOHN STURMAN  
Company LEVINE-FRICKE  
Address 1900 POWELL STREET  
City EMERYVILLE State CA Zip 94608 Phone (510) 652-4500

12. Laboratory

Name BC ANALYTICAL  
Address 1255 POWELL STREET  
City EMERYVILLE State CA Zip 94608  
State Certification No. 1353

13. Have tanks or pipes leaked in the past? Yes [ ] No [X]

If yes, describe. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

14. Describe methods to be used for rendering tank inert

- 1) PRODUCT AND SLUDGE REMOVAL

---

- 2) RINSING PIPING AND TANKS

---

- 3) DRY ICE

---

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

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

15. Tank History and Sampling Information

Tank		Material to be sampled (tank contents, soil, groundwater, etc.)	Location and Depth of Samples
Capacity	Use History (see instructions)		
10,000 GAL.	REGULAR DIESEL STOKEN, INSTALLATION DATE UNKNOWN. PRSENTLY IN SERVICE.	SOIL, GROUNDWATER IF SOIL IS CONTAMINATED OR IF GROUNDWATER IS PRESENT IN THE EXCAVATION.	SOIL-1" INTO NATIVE SOIL WATER - AT STATIC WATER LEVEL IN EXCAVATION. <i>1 sple at each end of tank</i>

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

Excavated/Stockpiled Soil	
Stockpiled Soil Volume (Estimated)	Sampling Plan
	<i>Stockpile must be characterized pursuant to disposal method</i>

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

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

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

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit
TPH <del>GASOLINE</del> Diesel	EPA 5090- 3550	EPA METHOD 8015	10 PPM (SOIL) 0.050 PPM (WATER)
BTXE	SAME	EPA METHOD 8020	0.005 PPM(SOIL) 0.005 PPM WATER

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

18. Submit Worker's Compensation Certificate copy

Name of Insurer SELF INSURED TO \$400,000. TRANSAMERICA  
INSURANCE COMPANY THEREAFTER

19. Submit Plot Plan (See Instructions)

20. Enclose Deposit (See Instructions)

21. Report any leaks or contamination to this office within 5 days of discovery. The report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report form. (see Instructions)

22. Submit a closure report to this office within 60 days of the tank removal. This report must contain all the information listed in item 22 of the instructions.

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true.

I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

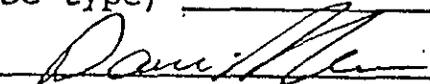
I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel health and safety. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

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

Signature of Contractor

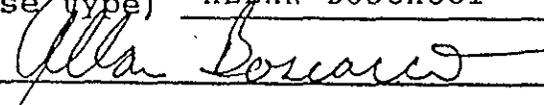
Name (please type) DAVE ROBINSON

Signature 

Date 11/27/91

Signature of Site Owner or Operator

Name (please type) ALLAN BOSCACCI

Signature 

Date \_\_\_\_\_

# UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

<b>EMERGENCY</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<b>HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED?</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<b>FOR LOCAL AGENCY USE ONLY</b> I HEREBY CERTIFY THAT I HAVE DISTRIBUTED THIS INFORMATION ACCORDING TO THE DISTRIBUTION SHOWN ON THE INSTRUCTION SHEET ON THE BACK PAGE OF THIS FORM.
<b>REPORT DATE</b> 05 29 92	<b>CASE #</b> _____	<b>SIGNED</b> _____ <b>DATE</b> _____

<b>REPORTED BY</b> NAME OF INDIVIDUAL FILING REPORT <b>JOHN FEHRINGER</b>	<b>PHONE</b> (510) 632-3467	<b>SIGNATURE</b> _____
<b>REPRESENTING</b> <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OTHER	<b>COMPANY OR AGENCY NAME</b> AMERICAN BRASS AND IRON FOUNDRY	
<b>ADDRESS</b> 7825 SAN LEANDRO STREET OAKLAND CALIFORNIA 94621		

<b>RESPONSIBLE PARTY</b> NAME AMERICAN BRASS AND IRON <input type="checkbox"/> UNKNOWN	<b>CONTACT PERSON</b> DAVE ROBINSON	<b>PHONE</b> (510) 632-3467
<b>ADDRESS</b> 7825 SAN LEANDRO STREET OAKLAND CALIFORNIA 94621		

<b>SITE LOCATION</b> FACILITY NAME (IF APPLICABLE) AMERICAN BRASS AND IRON	<b>OPERATOR</b> CLIFF COOPER	<b>PHONE</b> (510) 632-3467
<b>ADDRESS</b> 7825 SAN LEANDRO STREET OAKLAND ALAMEDA 94621		
<b>CROSS STREET</b> 77TH AVENUE		

<b>IMPLEMENTING AGENCIES</b> LOCAL AGENCY AGENCY NAME ALAMEDA COUNTY HEALTH CARE SERVICES	<b>CONTACT PERSON</b> MR. BARNEY CHAN	<b>PHONE</b> (510) 271-4320
REGIONAL BOARD CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - SAN FRANCISCO REGION	<b>CONTACT PERSON</b> MR. EDDY SO	<b>PHONE</b> (510) 464-1255

<b>SUBSTANCES INVOLVED</b> (1) NAME REGULAR GASOLINE, UNLEADED GASOLINE,	<b>QUANTITY LOST (GALLONS)</b> <input checked="" type="checkbox"/> UNKNOWN
(2) NAME DIESEL FUEL, 1-1-1 TRICHLOROETHANE	<input checked="" type="checkbox"/> UNKNOWN

<b>DISCOVERY/ABATEMENT</b> DATE DISCOVERED _____	<b>HOW DISCOVERED</b> <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> TANK TEST <input checked="" type="checkbox"/> TANK REMOVAL(S) <input type="checkbox"/> OTHER
DATE DISCHARGE BEGAN _____ <input checked="" type="checkbox"/> UNKNOWN	<b>METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY)</b> <input type="checkbox"/> REMOVE CONTENTS <input checked="" type="checkbox"/> CLOSE TANK & REMOVE <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> CLOSE TANK & FILL IN PLACE <input type="checkbox"/> CHANGE PROCEDURE <input type="checkbox"/> REPLACE TANK <input type="checkbox"/> OTHER
<b>HAS DISCHARGE BEEN STOPPED?</b> <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE _____	

<b>SOURCE/ CAUSE</b> <input type="checkbox"/> TANK LEAK <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER	<b>CAUSE(S)</b> <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL <input type="checkbox"/> CORROSION <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER
---	---

<b>CASE TYPE</b> <input checked="" type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)
--

<b>CURRENT STATUS</b> CHECK ONE ONLY <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED <input type="checkbox"/> POLLUTION CHARACTERIZATION <input type="checkbox"/> LEAK BEING CONFIRMED <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT UNDERWAY <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> REMEDIATION PLAN <input type="checkbox"/> CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY) <input checked="" type="checkbox"/> CLEANUP UNDERWAY
---

<b>REMEDIAL ACTION</b> CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS) <input type="checkbox"/> CAP SITE (CS) <input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input checked="" type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> VACUUM EXTRACT (VE) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> VENT SOIL (VS) <input type="checkbox"/> OTHER (OT) _____
---

**COMMENTS**  
 THIS UNAUTHORIZED RELEASE FORM IS FOR 4 UNDERGROUND TANKS REMOVED FROM AMERICAN BRASS AND IRON FOUNDRY - 1-8000 GALLON UNLEADED GASOLINE, 1-550 GALLON REGULAR GASOLINE, 1-8000 GALLON 1-1-1 TRICHLOROETHANE, AND 1-1000 GALLON \_\_\_\_\_





# BAY AREA AIR QUALITY MANAGEMENT DISTRICT

939 ELLIS STREET  
SAN FRANCISCO, CALIFORNIA 94109  
(415) 771-6000

REGULATION 8, RULE 40  
Aeration of Contaminated Soil and  
Removal of Underground Storage Tanks

*N. Lew*

## NOTIFICATION FORM

- Removal or Replacement of Tanks
- Excavation of Contaminated Soil

### SITE INFORMATION

SITE ADDRESS 7825 SAN LEANDRO STREET  
 CITY, STATE OAKLAND, CALIFORNIA ZIP 94621  
 OWNER NAME AMERICAN BRASS AND IRON FOUNDRY  
 SPECIFIC LOCATION OF PROJECT UNDERGROUND DIESEL FUEL TANK-

<p><u>TANK REMOVAL</u></p> <p>SCHEDULED STARTUP DATE <u>6/3/92</u></p> <p>VAPORS REMOVED BY:</p> <p><input checked="" type="checkbox"/> WATER WASH</p> <p><input checked="" type="checkbox"/> VAPOR FREEING (CO<sup>2</sup>)</p> <p><input type="checkbox"/> VENTILATION</p>	<p><u>CONTAMINATED SOIL EXCAVATION</u></p> <p>SCHEDULED STARTUP DATE <u>6/3/92</u></p> <p>STOCKPILES WILL BE COVERED? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/></p> <p>ALTERNATIVE METHOD OF AERATION (DESCRIBE BELOW):</p> <p>_____</p> <p>(MAY REQUIRE PERMIT)</p>
--	--

### CONTRACTOR INFORMATION

NAME AMERICAN BRASS & IRON CONTACT DAVE ROBINSON  
 ADDRESS 7825 SAN LEANDRO ST PHONE (510) 632-3467  
 CITY, STATE, ZIP OAKLAND, CALIFORNIA 94621

### CONSULTANT INFORMATION (IF APPLICABLE)

NAME LEVINE FRICKE CONTACT JULIE SHARP  
 ADDRESS 1900 POWELL ST., 12<sup>th</sup> FLOOR PHONE (510) 652-4500  
 CITY, STATE, ZIP EMERYVILLE, CALIFORNIA 94608

### FOR OFFICE USE ONLY

DATE RECEIVED FAX _____	BY _____
DATE POSTMARKED <u>5/28/92</u>	BY <u><i>Blg</i></u> (init.)
CC: INSPECTOR NO. <u>553</u>	DATE <u>6/1/92</u> BY <u><i>Blg</i></u> (init.)
UPDATE: CONTACT NAME _____	DATE _____ BY _____
BAAQMD N # _____	DATA ENTRY <u>6/1/92</u> (init.)



APPENDIX B

FIRE INSPECTOR NOTES  
LEVINE\*FRICKE FIELD NOTES  
DISPOSAL MANIFEST

CITY OF OAKLAND  
REPORT OF FIRE INSPECTION

ENGINE CO.

ADDRESS 7825 San Leandro

E 29

NAME \_\_\_\_\_

GENERAL INSPECTION

PERMIT   
OTHER

HAZARD NOTED

HAZARD ABATED

NOTICE LEFT LETTER

1st NOTICE

2nd NOTICE

FINAL

DATE	VIOLATION	O.F.C.	CONTACTED
6-3-92	Wellness Tank Removal 10,000 gal. 6L 2 1/2" O.D. 18" Hauled by H&H # 300933 No Hazards noted in Tank		

A REINSPECTION WILL BE MADE WITHIN \_\_\_\_\_ DAYS.

338-5 (Rev. 5-77)

FIRE PREVENTION BUREAU — PHONE 273-3851

INSPECTOR Baunelle #208



Abel Carbonic

CUSTOMER NUMBER	PURCHASE ORDER NO.	DATE	DELIVERY NUMBER
		6/3/21	210293

BY ACCEPTING THIS ORDER, CUSTOMER AGREES TO ALL OF THE TERMS AND CONDITIONS SET FORTH HEREIN, INCLUDING THOSE PRINTED ON THE REVERSE SIDE.

NAME	ACCEPTED BY:
AMERICAN BRASS IRON	<i>[Signature]</i>
SHIPPED TO	

UNIT	DESCRIPTION	CODE	POUNDS
4	DRY ICE ORM-A UN1845	23	200
1		23	50
			250

20 SOLID	21 HALF	22 SLICES	23 ROCKS	24 AIRPORT	29 WET ICE
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JOS

LEVINE • FRICKE

PAGE 1 OF 4

DATE 6-3-92

# DAILY CONSTRUCTION REPORT #

S	M	T	W	TH	F	S
			X			

PROJECT: 2408.01

WEATHER: Sunny

OWNER: ABI

SITE CONDITIONS:

CONTRACTOR: -ABI

TEMPERATURE: 70°F

- copy pictures for Dave - Dave will give me copy of County & H&H forms on Fri

VISITORS: Eric Nye, Brande, Marlon - Oakland FID, Inspector  
County - Barney Chan

### WORK FORCE

	SUPERVISORS	WORKERS	REMARKS

### EQUIPMENT

Case 580E backhoe	H&H Lowboy
Cranp - Bucyrus Erie (mayet also for scrap)	
Deere 344E Loader	

ACTIVITIES 8:30 Arrived on-site; tank is uncovered - water in pit looks petroleum-affected.

ABI purging water from pit - putting in 55-gallon drums (3)

Piping all removed

Tank recently (last year) pressure tested

10:00 Stockpile of recently excavated material has 15-50 ppm on PID

- Dispenser reportedly removed prior to L-F presence

11:20 Eric & County on site - Lifting tank.

Oily product (black) in East End of tank visible in G-W

No signs of corrosion/pitting on tank (inc. underside) - in good condition; proceeded to load into H&H low boy trailer.

11:35 Purging G-W from tank excavation into barrels for their treatment system

- Began over excavation in E area; soil is black/green with PID 20-40 ppm.

- Dave requested to take soil & g-w samples on Monday - after ABI has had time to over excavate affected soil. County said OK. Stock pile

will be sampled then too. I told Dave that it might be good to either

use a drill rig to reach or grab some samples now - because they will not need to

clean up site to monitor that a Monitoring Well is likely anyway, also

### COPIES:

that any soils he excavates he will need to dispose of. Dave said he will try bioremediation of soils and that he wants to get to a where it looks clean before

### SIGNED:

dispose of. Dave said he will try bioremediation of soils and that he wants to get to a where it looks clean before

LEVINE • FRICKE

# DAILY CONSTRUCTION REPORT #

PAGE 2 OF 4

DATE 6-3-92

S M T W TH F S

DAY

			X			
--	--	--	---	--	--	--

PROJECT: 2408.01

WEATHER \_\_\_\_\_

OWNER: \_\_\_\_\_

SITE CONDITIONS \_\_\_\_\_

CONTRACTOR: \_\_\_\_\_

TEMPERATURE \_\_\_\_\_

### VISITORS


### WORK FORCE

	SUPERVISORS	WORKERS	REMARKS

### EQUIPMENT


### ACTIVITIES

sampling (G-W + soil). County + Dave + I do not know what site clean up is for Diesel. I also mentioned that the green backfill sand could be a native color - but may also be representative of petroleum.

Pit will be over excavated in the N + S direction in East End. Soil can not be further excavated in E direction. There is also visible spots of green sand in Western end of pit - I will have them dig up before I leave Site.

∴ Eastern end has black/green discolored soil, West end has slight green sand beneath tank - Eastern end has black product (oily) and Western end has slight sheen.

2pm - Scooped in West wall of excavation - no PID + smells/looks clean (with organic) - also scooped green backfill sand in bottom of Western excavation - no slight (0-4ppm) PID but smells of diesel. I recommended that Dave excavate the green sand now because if <sup>was</sup> monitoring no sense in leaving it (as he intended to do) of trying to over excavate walls. Dave agreed.

Plan to return to Site (w/ county also) on Friday. Dave or John will leave

COPIES:

me a message on frame tomorrow

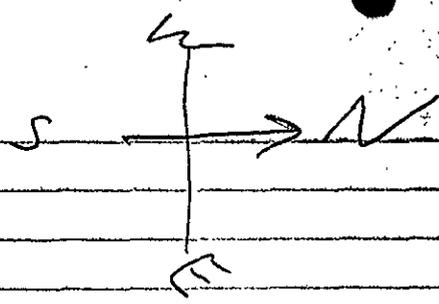
SIGNED:

Sampling/FPI

2:05 left Site tank gone

10/10/92

DISPENSER  
STOCK PILE

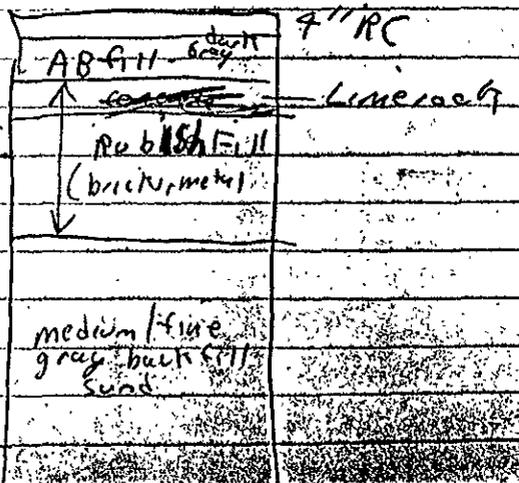
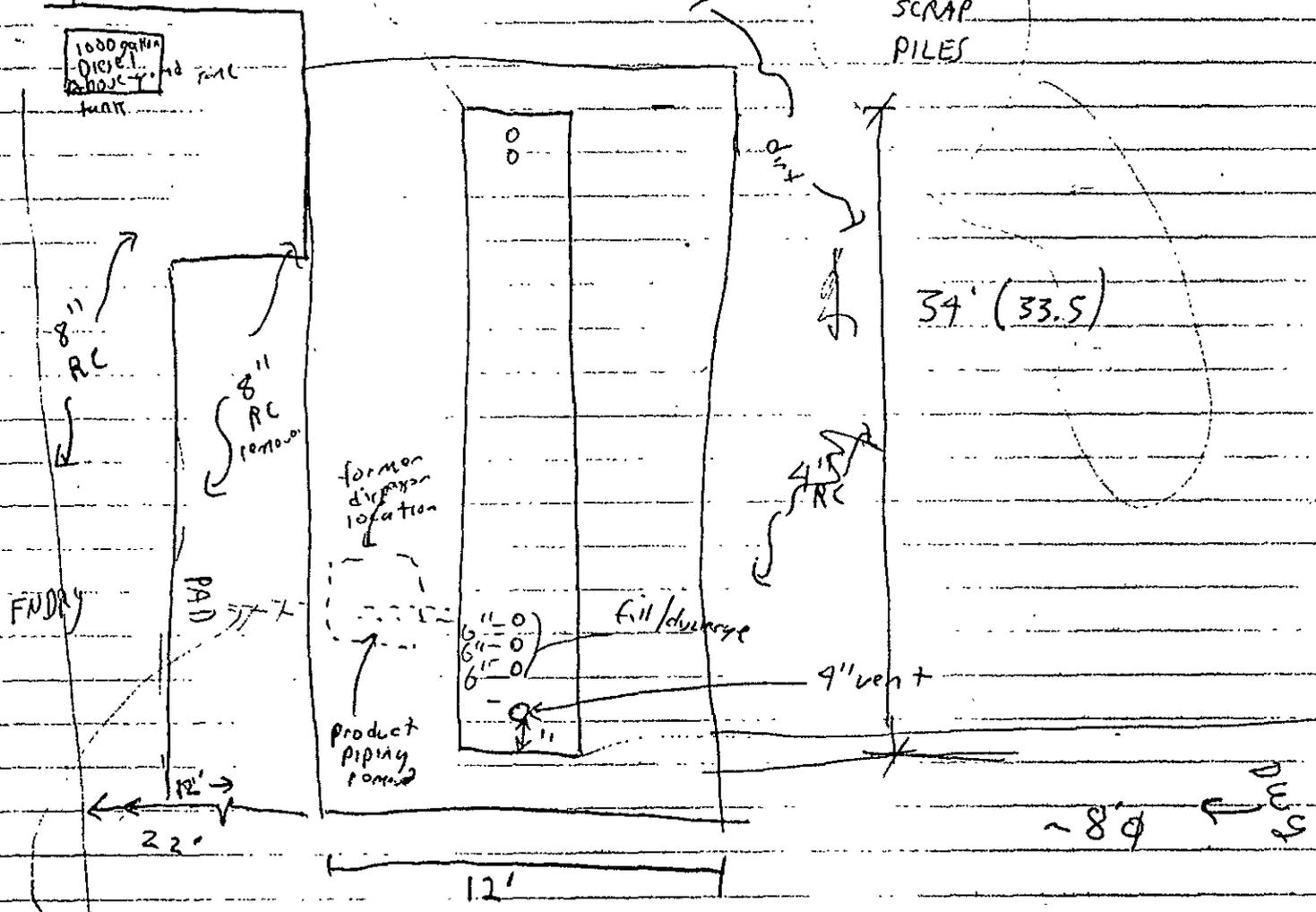


oil / paper covered steel  
(paper not intact)

1000 gal tank  
DIRECT...  
tank

SCRAP  
PILES

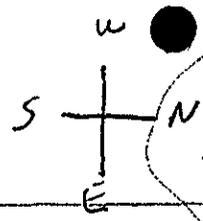
34' (33.5)



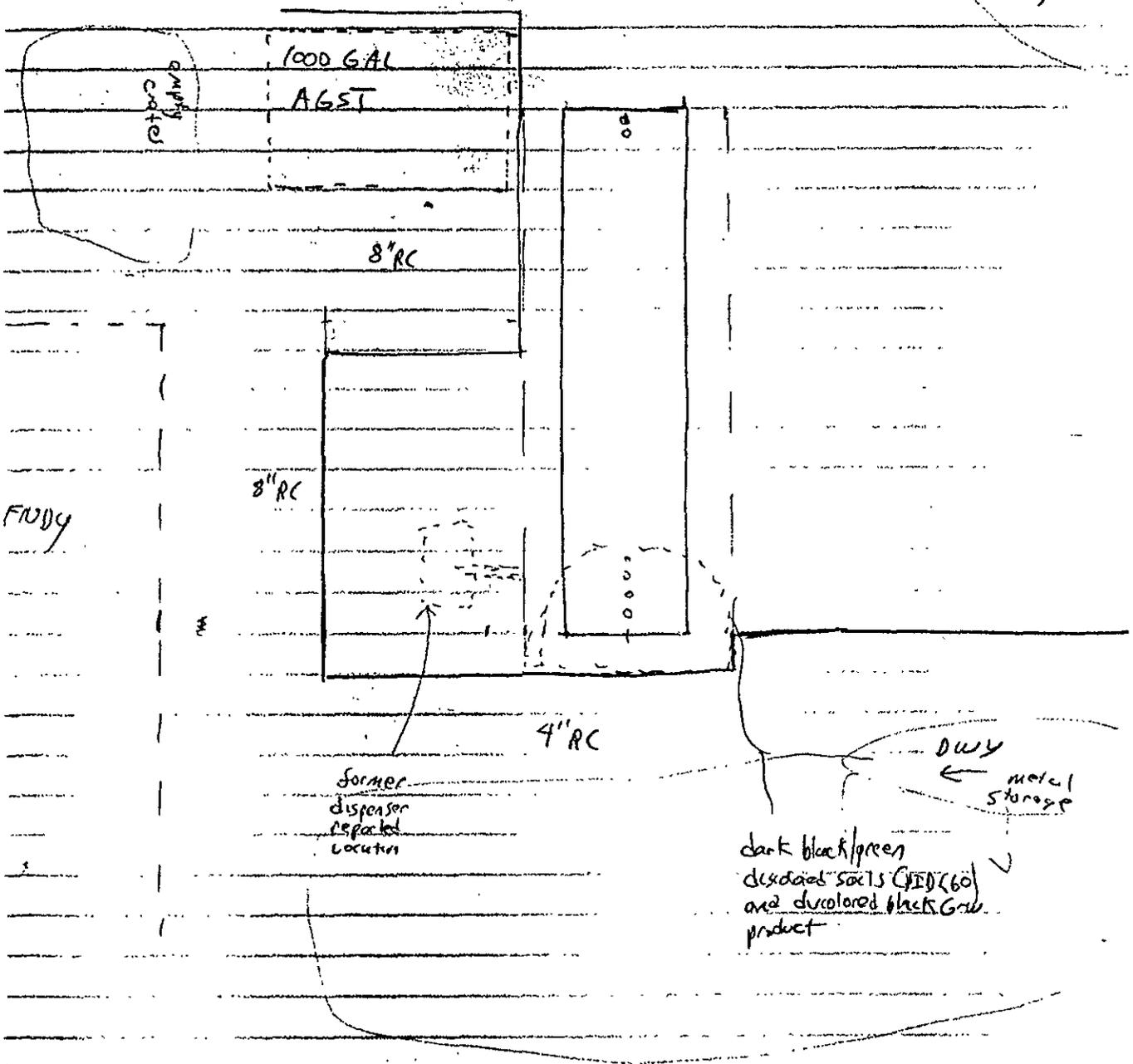
4" RC  
6-wat 9.5-10' bgs  
oily product / sheen in 6-w in E. pit  
6-w pit at 6-w

2408.01  
MJD  
6-3-92

LIT



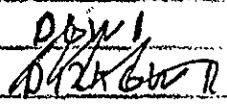
4/4  
1" = 10'  
SCALE



SOIL SAMPLES



H2O SAMPLES



~~DEPT~~

DGW1

D.E.W.I. N1 - depth

2 S  
3 E

JOS

PAGE 1 OF 5

DATE 6-5-92

LEVINE • FRICKE

# DAILY CONSTRUCTION REPORT #

S	M	T	W	TH	F	S
					X	

PROJECT: 2408.01  
 OWNER: ABI  
 CONTRACTOR: ABI

WEATHER: Sunny  
 SITE CONDITIONS: Sample/backfill  
 TEMPERATURE: 72°F

### VISITORS


### WORK FORCE

	SUPERVISORS	WORKERS	REMARKS

### EQUIPMENT

Backhoe	

ACTIVITIES 7:25 Arrived on-site. John Ferrigno & I are waiting for Dave to check status, Dave said county does not need to be present, Grabbed water sample

8:30 finished grab 6<sup>th</sup> sampling - V at 10-10.1 fbg at time of sampling, visible production in excavation water - but no black discoloration

### WALL SAMPLES

1 at 9' in blk/silty clay - NO PID but slight discolor	BH
2 at 9' " - NO PID NO odor	BH
3 at 8.75" " - NO PID, NO odor	BH
4 at 8 fbg " " - NO PID or odor	BH
5 at 8.5 fbg " " " " " "	BH
6 at 9/8.5 fbg " " " " " "	BH



Methan  
BH  
BH  
BH  
BH  
BH

9:45 finished sampling; ABI began backfilling (BH - Backhoe HA - Hand Auger)

~200cy stockpiled on concrete w/roof - to be analyzed (if used possibly) later

### TANK D

- will send signed copy of manifest
- Dave will write report - will send to JOS for peer review

COPIES: we put data in tables

SIGNED: MJO

- copy old survey also.  
 - Analyze: 1, 2, 4, 6 Both

3<sup>rd</sup> Diesel only \* 11m depth lab - host price / tank (discuss on ...)



# DAILY CONSTRUCTION REPORT #

S	M	T	W	TH	F	S
					X	

PROJECT: 2408.0

WEATHER: \_\_\_\_\_

OWNER: \_\_\_\_\_

SITE CONDITIONS: \_\_\_\_\_

CONTRACTOR: \_\_\_\_\_

TEMPERATURE: \_\_\_\_\_

### VISITORS


### WORK FORCE

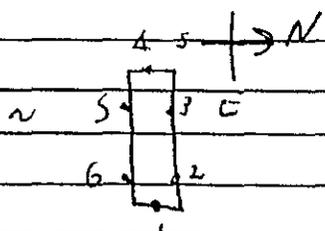
	SUPERVISORS	WORKERS	REMARKS

### EQUIPMENT


ACTIVITIES - Back filled w/ stockpiled soil from before (VTK samples) - Dave knew results were not ND but he said they were good enough.

All samples collected in Native dk gray silty clay

OLD ID	NEW ID	REMARKS
1	DEW1-E-9 (TPH D/BTK)	← tank exc. well #1 well depth bsg
2	DEW2-N-9 (TPH D/BTK)	
3	DEW3-N-8.5 (TPH D)	
4	DEW4-W-8 (TPH D/BTK)	
5	DEW5-S-8.5 (TPH D)	
6	DEW6-S-9 (TPH D/BTK)	
G-W	w D- Groundwater (TPH D/BTK)	



orig G-W at 9.5 - 10' in E end (bsg)  
at 9' in W end

TODAY 10' in E end  
9' in W end

COPIES:

11:45 took samples to Quantex

SIGNED: \_\_\_\_\_

SAN LEANDRO ST.



SSO-g gasoline

Employee Parking

Overhead power line

8K vented tank

gasline  
Compressed Gas Storage Area

Stock Room  
Copy of ER Plan

12K Volt  
"Gchic"

8K  
TCA  
tank

77TH AVE.

Roll  
Clone

Pipe  
Finishing

Shipping  
Area

Core Room

x - eye wash

Herman  
Building

Sump

Foundry

Bag  
House

16K  
diesel tank

Ditch

Elmhurst Canal

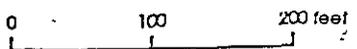
12K  
Stockpile  
15-50 ppm  
P111

Lab

Well

eyewash

SPT Co. Tracks



hay exit

eyewash

4/5 3/4 63142

DISPENSER  
STOCK PILE

oil / paper covered steel

(paper not intact)

1000 gals  
DIESEL  
STOCK PILE

SCRAP  
PILES

34' (33.5)

formal  
dispenser  
location

fill/drainage

product  
piping  
formed

REVISED

FINDRY

PAD

4" vent

DUCTS

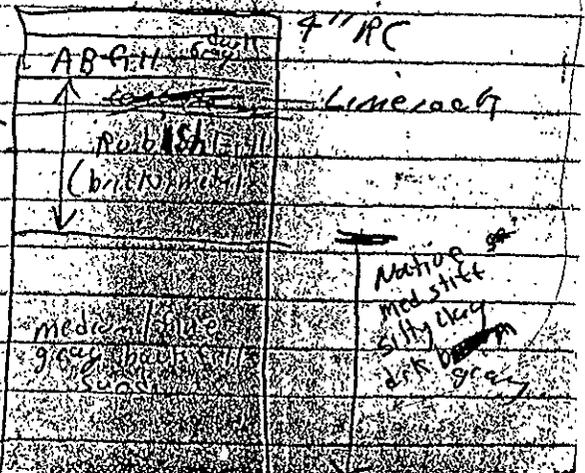
12' →  
22'

12'

4" RC

AT TANK

AT NATIVE



4" RC  
 6" W x 9.5-10" dia  
 only product / sheet in 6" W in E. pit  
 6" W x 6" W

Please print or type. Form designed for use on ellipse (12-pitch typewriter).

91510000  
IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER, 1-800-424-8802. WITHIN CALIFORNIA, CALL 1-800-852-7550

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. CA 10 10 12 11 17 17 14 15 15 19		Manifest Document No. 0 1 0 1 0 1 0 1 3		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address <b>AMERICAN BRASS &amp; IRON FOUNDRY</b> 7825 San Leandro Street, Oakland, CA, 94621				A. State Manifest Document Number <b>91510000</b>					
4. Generator's Phone <b>(415) 632-3467</b>				B. State Generator's ID					
5. Transporter 1 Company Name <b>H &amp; H Ship Service Company</b>		6. US EPA ID Number CA 15 10 10 14 17 17 11 11 16 19		C. State Transporter's ID <b>200833</b>		D. Transporter's Phone <b>(415) 543-4835</b>			
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone			
9. Designated Facility Name and Site Address <b>H &amp; H Ship Service Company</b> 220 China Basin Street San Francisco, CA 94107				10. US EPA ID Number CA 10 10 10 14 17 17 11 11 16 19		G. State Facility's ID <b>CA 10 10 10 14 17 17 11 11 16 19</b>		H. Facility's Phone <b>(415) 543-4835</b>	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers		13. Total		14. Unit		1. Waste Number
a. <b>RESIDUE DIESEL TANK</b> <b>NON-RCRA HAZARDOUS WASTE SOLID</b>			No. Type		Quantity		Wt/Vol		State EPA/Other
			0 0 1 T I P		1 0 0 0 0		P		512
b. <b>RESIDUE ASSOCIATED PIPING</b> <b>NON-RCRA HAZARDOUS WASTE SOLID</b>			0 0 1 B I A		0 0 0 5 0		P		513
c.									
d.									
J. Additional Descriptions for Materials Listed Above <b>EMPTY 10,000 gallon tank last containing diesel.</b> <b>Tank inerted with dry ice for transport.</b> <b>PROFILE #A1046</b>				K. Handling Codes for Wastes Listed Above					
				a.		b.			
				0 1					
				c.		d.			
15. Special Handling Instructions and Additional Information <b>JOB #10742</b> <b>24 Hr. Emergency Contact: H &amp; H # (415) 543-4835</b> <b>APPROPRIATE PROTECTIVE CLOTHING AND RESPIRATOR</b>									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name <b>JOHN P. FEHRINGER</b>				Signature <i>John P. Fehring</i>				Month Day Year <b>0 6 1 0 1 2 0 2</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name <b>NORMAN L. BERG</b>				Signature <i>Norman L. Berg</i>				Month Day Year <b>0 6 1 0 1 3 1 9 1 2</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name				Signature				Month Day Year	
19. Discrepancy Indication Space <b>LINE 13 SHOULD READ 12,000</b>									
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.									
Printed/Typed Name <b>Cleveland Valley</b>				Signature <i>Cleveland Valley</i>				Month Day Year <b>0 6 1 0 3 9 1 2</b>	

DO NOT WRITE BELOW THIS LINE.

# ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

## Hazardous Materials Division Inspection Form

②

Site ID# \_\_\_\_\_ Site Name AB+I Today's Date 6/3/92  
 Site Address 7825 San Leandro St EPA ID# \_\_\_\_\_  
 City \_\_\_\_\_ Zip 94 Phone \_\_\_\_\_

MAX Amt. Stored > 500lbs/55g/200cf?  Y  N  
 Hazardous Waste generated per month? \_\_\_\_\_

**Inspection Categories:**

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

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

**I.A. GENERATOR (Title 22)**

- |                   |                               |         |
|-------------------|-------------------------------|---------|
| —                 | 1. Waste ID                   | * 66471 |
| —                 | 2. EPA ID                     | 66472   |
| —                 | 3. > 90 days                  | 66508   |
| —                 | 4. Label dates                | 66508   |
| —                 | 5. Biennial                   | 66493   |
| <hr/>             |                               |         |
| Manifest          | — 6. Records                  | 66492   |
|                   | — 7. Correct                  | 66484   |
|                   | — 8. Copy sent                | 66492   |
|                   | — 9. Exception                | 66484   |
|                   | — 10. Copies Rec'd            | 66492   |
| <hr/>             |                               |         |
| Misc.             | — 11. Treatment               | 66371   |
|                   | — 12. On-site Disp. (H.S.&C.) | 26189.5 |
|                   | — 13. Ex Haz. Waste           | 66570   |
| <hr/>             |                               |         |
| Prevention        | — 14. Communications          | 67121   |
|                   | — 15. Aisle Space             | 67124   |
|                   | — 16. Local Authority         | 67126   |
|                   | — 17. Maintenance             | 67120   |
|                   | — 18. Training                | 67105   |
| <hr/>             |                               |         |
| Confin. Agency    | — 19. Prepared                | 67140   |
|                   | — 20. Name List               | 67141   |
|                   | — 21. Copies                  | 67141   |
|                   | — 22. Emg. Coord. Trng.       | 67144   |
| <hr/>             |                               |         |
| Containers, Tanks | — 23. Condition               | 67241   |
|                   | — 24. Compatibility           | 67242   |
|                   | — 25. Maintenance             | 67243   |
|                   | — 26. Inspection              | 67244   |
|                   | — 27. Buffer Zone             | 67246   |
|                   | — 28. Tank Inspection         | 67259   |
|                   | — 29. Containment             | 67245   |
|                   | — 30. Safe Storage            | 67261   |
|                   | — 31. Freeboard               | 67257   |

**Comments:**

Put in approx 10' x 30' x 13' deep  
 East end soils are a blue green oily appearance  
 OVA reading of soils from east end gave 60ppm  
 which could mean v. high diesel.  
 AB+I will over excavate the east end to  
 apparent "clean" prior to soil sampling.  
 The water still appears to have a dark  
 slaty layer. Will determine what  
 samples (soil and GW) will be taken after  
 overexcavation completed. Apparent clay layer  
 exists approx 4 feet deeper.

**I.B. TRANSPORTER (Title 22)**

- |          |                           |       |
|----------|---------------------------|-------|
| —        | 32. Applic./Insurance     | 66428 |
| —        | 33. Comp. Cert./CHP Insp. | 66448 |
| —        | 34. Containers            | 66465 |
| <hr/>    |                           |       |
| Manifest | — 35. Vehicles            | 66465 |
|          | — 36. EPA ID #s           | 66531 |
|          | — 37. Correct             | 66541 |
|          | — 38. HW Delivery         | 66543 |
|          | — 39. Records             | 66544 |
| <hr/>    |                           |       |
| Cont'r   | — 40. Name/ Covers        | 66545 |
|          | — 41. Recyclables         | 66600 |

Rev 6/88

Contact: D. Robinson  
 Title: \_\_\_\_\_  
 Signature: \_\_\_\_\_

Inspector: B. Chan  
 Signature: \_\_\_\_\_

# ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

## Hazardous Materials Division Inspection Form

Site ID# \_\_\_\_\_ Site Name AB+I Today's Date 6/3/92  
 Site Address 7825 San Leandro St EPA ID# \_\_\_\_\_  
 City \_\_\_\_\_ Zip 94621 Phone \_\_\_\_\_

MAX Amt. Stored > 500lbs/55g/200cf?  Y  N  
 Hazardous Waste generated per month? \_\_\_\_\_

**Inspection Categories:**

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

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

**I.A. GENERATOR (Title 22)**

- |  |  |
|--|--|
| <p><b>Manifest</b></p> <p><b>Misc.</b></p> <p><b>Prevention</b></p> <p><b>Confin. Agency</b></p> <p><b>Containers, Tanks</b></p> | <p>1. Waste ID * 66471</p> <p>2. EPA ID 66472</p> <p>3. &gt; 90 days 66508</p> <p>4. Label dates 66508</p> <p>5. Biennial 66493</p> <hr/> <p>6. Records 66492</p> <p>7. Correct 66484</p> <p>8. Copy sent 66492</p> <p>9. Exception 66484</p> <p>10. Copies Rec'd 66492</p> <hr/> <p>11. Treatment 66371</p> <p>12. On-site Disp. (H.S.&amp;C.) 26189.5</p> <p>13. Ex Haz. Waste 66570</p> <hr/> <p>14. Communications 67121</p> <p>15. Aisle Space 67124</p> <p>16. Local Authority 67126</p> <p>17. Maintenance 67120</p> <p>18. Training 67105</p> <hr/> <p>19. Prepared 67140</p> <p>20. Name List 67141</p> <p>21. Copies 67141</p> <p>22. Emg. Coord. Trng. 67144</p> <hr/> <p>23. Condition 67241</p> <p>24. Compatibility 67242</p> <p>25. Maintenance 67243</p> <p>26. Inspection 67244</p> <p>27. Buffer Zone 67246</p> <p>28. Tank inspection 67259</p> <p>29. Containment 67245</p> <p>30. Safe Storage 67261</p> <p>31. Freeboard 67257</p> |
|--|--|

**Comments:**

Witness removal of 12 K steel diesel tank

Maxon handle ODP removed

no CEL, O<sub>2</sub> - 1890

T. Jesberger & D. Polansky of AB+I present

Mike Stoll of low-vol fuel dealer

Tank is too damaged w/ considerable warping

referenced

Tank has no apparent leaks but idling

is considerably discolored on the E-end

thrust gas oil contains the water

predominantly on the east end

North is towards, Bennett Ave 933 W

exp. Jan 93, Manufact # 91510000

Approx. 3.55 drums of oil/water pumped out

prior to sampling San Leandro St

□ Bldg

PE tracks

**I.B. TRANSPORTER (Title 22)**

- |   |  |
|---|--|
| <p><b>Manifest</b></p> <p><b>Cont'n's</b></p> | <p>32. Applic./Insurance 66428</p> <p>33. Comp. Cert./CHP Insp. 66448</p> <p>34. Containers 66465</p> <hr/> <p>35. Vehicles 66465</p> <p>36. EPA ID #s 66531</p> <p>37. Correct 66541</p> <p>38. HW Delivery 66543</p> <p>39. Records 66544</p> <hr/> <p>40. Name/ Covers 66545</p> <p>41. Recyclables 66800</p> |
|---|--|

Contact: Dave Robinson Inspector: Barney Chan  
 Title: \_\_\_\_\_ Signature: Barney Chan  
 Signature: [Signature]

APPENDIX C

LABORATORY ANALYSIS  
GC CHARACTERIZATION ANALYSIS  
CHAIN OF CUSTODY

**DRAFT**

FORMERLY MED-TOX

PAGE 1 OF 10

LEVINE-FRICKE  
 1900 POWELL STREET  
 12TH FLOOR  
 EMERYVILLE, CA 94608  
 ATTN: MICHAEL STOLL

REPORT DATE: 06/17/92

DATE SAMPLED: 06/05/92

DATE RECEIVED: 06/05/92

CLIENT PROJ. ID: 2408.01  
 C.O.C. SERIAL NO: 10826

QUANTEQ JOB NO: 9206070

ANALYSIS OF: WATER AND SOIL SAMPLES

Client Sample Id.	Quanteq Lab Id.	Extractable Hydrocarbons as Diesel (mg/kg)	Extractable Hydrocarbons as Diesel (mg/L)
DEW1-E-9	01A	ND	---
DEW2-N-9	02A	ND	---
DEW3-N-8.5	03A	ND	---
DEW4-W-8	04A	ND	---
DEW5-S-8.5	05A	ND	---
DEW6-S-9	06A	2	---
D-GROUNDWATER	07A	---	6.8
Detection Limit		1	0.05
Method:		3550 GCFID	3520 GCFID
Instrument: C			
Date Extracted:		06/15/92	06/12/92
Date Analyzed:		06/15/92	06/16/92

ND = Not Detected

Andrew Bradeen, Manager  
 Organic Laboratory

Results FAXed 06/16/92

*2 signed copies*



PAGE 2 OF 10  
Fixed

LEVINE-FRICKE

CLIENT ID: DEW1-E-9  
CLIENT PROJ. ID: 2408.01  
DATE SAMPLED: 06/05/92  
DATE RECEIVED: 06/05/92  
REPORT DATE: 06/16/92

QUANTEQ LAB NO: 9206070-01A  
QUANTEQ JOB NO: 9206070  
DATE ANALYZED: 06/08/92  
INSTRUMENT: H

BTEX (SOIL MATRIX)  
METHOD: EPA 8020 (5030)

COMPOUND	CAS #	CONCENTRATION (ug/kg)	DETECTION LIMIT (ug/kg)
Benzene	71-43-2	ND	5
Toluene	108-88-3	ND	5
Ethylbenzene	100-41-4	ND	5
Xylenes, Total	1330-20-7	ND	5

ND = Not Detected

## LEVINE-FRICKE

CLIENT ID: DEW2-N-9  
CLIENT PROJ. ID: 2408.01  
DATE SAMPLED: 06/05/92  
DATE RECEIVED: 06/05/92  
REPORT DATE: 06/16/92

QUANTEQ LAB NO: 9206070-02A  
QUANTEQ JOB NO: 9206070  
DATE ANALYZED: 06/08/92  
INSTRUMENT: H

BTEX (SOIL MATRIX)  
METHOD: EPA 8020 (5030)

COMPOUND	CAS #	CONCENTRATION (ug/kg)	DETECTION LIMIT (ug/kg)
Benzene	71-43-2	ND	5
Toluene	108-88-3	ND	5
Ethylbenzene	100-41-4	ND	5
Xylenes, Total	1330-20-7	ND	5

ND = Not Detected

## LEVINE-FRICKE

CLIENT ID: DEW4-W-8  
CLIENT PROJ. ID: 2408.01  
DATE SAMPLED: 06/05/92  
DATE RECEIVED: 06/05/92  
REPORT DATE: 06/16/92

QUANTEQ LAB NO: 9206070-04A  
QUANTEQ JOB NO: 9206070  
DATE ANALYZED: 06/08/92  
INSTRUMENT: H

BTEX (SOIL MATRIX)  
METHOD: EPA 8020 (5030)

COMPOUND	CAS #	CONCENTRATION (ug/kg)	DETECTION LIMIT (ug/kg)
Benzene	71-43-2	ND	5
Toluene	108-88-3	ND	5
Ethylbenzene	100-41-4	ND	5
Xylenes, Total	1330-20-7	ND	5

ND = Not Detected

## LEVINE-FRICKE

CLIENT ID: DEW6-S-9  
CLIENT PROJ. ID: 2408.01  
DATE SAMPLED: 06/05/92  
DATE RECEIVED: 06/05/92  
REPORT DATE: 06/16/92

QUANTEQ LAB NO: 9206070-06A  
QUANTEQ JOB NO: 9206070  
DATE ANALYZED: 06/08/92  
INSTRUMENT: H

BTEX (SOIL MATRIX)  
METHOD: EPA 8020 (5030)

COMPOUND	CAS #	CONCENTRATION (ug/kg)	DETECTION LIMIT (ug/kg)
Benzene	71-43-2	ND	5
Toluene	108-88-3	ND	5
Ethylbenzene	100-41-4	ND	5
Xylenes, Total	1330-20-7	ND	5

ND = Not Detected

## LEVINE-FRICKE

CLIENT ID: D-GROUNDWATER  
CLIENT PROJ. ID: 2408.01  
DATE SAMPLED: 06/05/92  
DATE RECEIVED: 06/05/92  
REPORT DATE: 06/16/92

QUANTEQ LAB NO: 9206070-07C  
QUANTEQ JOB NO: 9206070  
DATE ANALYZED: 06/08/92  
INSTRUMENT: G

BTEX (WATER MATRIX)  
METHOD: EPA 8020 (5030)

COMPOUND	CAS #	CONCENTRATION (ug/L)	DETECTION LIMIT (ug/L)
Benzene	71-43-2	ND	0.3
Toluene	108-88-3	ND	0.3
Ethylbenzene	100-41-4	ND	0.3
Xylenes, Total	1330-20-7	ND	1

ND = Not Detected

R-3,S-1  
R-1,S-A

CHAIN OF CUSTODY / ANALYSES REQUEST FORM

9206070

Project No.: 2408.01      Field Logbook No.:      Date: 6-5-92      Serial No.: 10826  
 Project Name: American Brass & Iron      Project Location: Oakland, CA

Sampler (Signature): Michael Stoll      ANALYSES      Samplers: MJJ  
 SAMPLES      HOLD      RUSH

SAMPLE NO.	DATE	TIME	LAB SAMPLE NO.	NO. OF CONTAINERS	SAMPLE TYPE	ANALYSES				HOLD	RUSH	REMARKS
						EPA 601	EPA 624	TPH-D	BTX&F			
DEW1-E-9	6-5-92		01A	1	Soil			X	X			Regular 7wd TAT Results to: Michael Stoll
DEW2-N-9			02A	1				X	X			
DEW3-N-8.5			03A	1				X				
DEW4-N-8			04A	1				X	X			
DEW5-S-8.5			05A	1				X				
DEW6-S-9			06A	1	X			X	X			
D-Gravimetric	X	8:20	07A-D	4	Water			X	X			Please Bill our client directly: American Brass & Iron 7825 San Leandro Street Oakland, CA 94621 Attn: Dave Robinson 632-8035 - FAX Per arrangements w/ Robin Byers
					2 VOA-preserved							
					2 Amber flts-preserved							

RELINQUISHED BY: (Signature) Michael Stoll	DATE 6-5-92	TIME 12:42	RECEIVED BY: (Signature) Gina Gillespie	DATE 6-5-92	TIME 1242
RELINQUISHED BY: (Signature)	DATE	TIME	RECEIVED BY: (Signature)	DATE	TIME
RELINQUISHED BY: (Signature)	DATE	TIME	RECEIVED BY: (Signature)	DATE	TIME
METHOD OF SHIPMENT:	DATE	TIME	LAB COMMENTS:		

Sample Collector: LEVINE-FRICKE  
 1900 Powell Street, 12th Floor  
 Emeryville, Ca 94608  
 (415) 652-4500

Analytical Laboratory: Attn: Robin Byers  
 Quanteg, Pleasant Hill, CA

SUBS... H 8  
 476 P08  
 9:54AM  
 6-17-92  
 QUANTEG  
 JUN 17 '92 09:55  
 BY: XERUX TELECOPIER 7010 ; 6-17-92



## AMERICAN BRASS & IRON FOUNDRY

7825 San Leandro Street • Oakland, CA 94621 • (510) 632-3467  
Fax No. (510) 632-8035

May 21, 1992

Mr. Barney Chan  
Hazardous Materials Specialists  
ALAMEDA COUNTY HEALTH AGENCY  
80 Swan Way, Room 200  
Oakland, CA 94621

92 MAY 22 07:14:18

Dear Mr. Chan,

Please be informed the removal of American Brass and Iron's underground diesel storage tank is scheduled for the week of June 1, 1992. Attached is an action schedule outline for your reference. Your presents is requested for June 3, 1992 at which time the tank will be removed and soil samples taken.

If you have any questions or require additional information, please feel free in contacting me at (510) 632-3467, ext. 211.

Sincerely,

Dave Robinson  
Environmental Manager

cc. John Sturman, Levine\*Fricke

**ACTION PLAN SCHEDULE  
(UST-Diesel)**

<b>TASK DESCRIPTION</b>	<b>DATE</b>
1. Drain tank and place inactive	Completed
2. Pump tank dry and clean	Completed
3. Remove Concrete surface pad	Completed
4. Begin excavate surface soil	June 2, 1992
5. Remove tank, take soil samples	June 3, 1992
6. Excavate contaminated soil Take soil/water samples	June 3-4, 1992
7. Back fill excavated area	June 4, 1992
8. Pour concrete pad	June 5, 1992





# AMERICAN BRASS & IRON FOUNDRY

7825 San Leandro Street • Oakland, CA 94621 • (510) 632-3467  
Fax No. (510) 632-8035

February 7, 1992

*550 gallon tank*

**ALAMEDA COUNTY HEALTH SERVICES**  
Att. Mr. Barney Chan  
Hazardous Materials Specialist  
80 Swan Way, Rm 200  
Oakland, CA 94621

Dear Mr. Chan:

In accordance with Alameda County Health Care Services and Tri - Regional Board Staff Recommendations for Underground Storage Tank Removal Procedures, please find attached American Brass & Iron Foundry's closure report for the removal of an on site 550 gallon storage tank. This report is comprised of a summary report by Levine-Fricke Consultants and a copy of the excavation permit by the city of Oakland.

Please note this closure report reflects a portion of the initial underground storage tank closure plan submitted to Alameda County Health Agency on August 1, 1991. It is our intention to address all ground water monitoring programs at the completion of the overall tank removal project at AB&I. Information on soil geology and ground water contamination for surrounding property locations are being reviewed in order to fully evaluate a soil ground water investigation.

If you require further information or have additional questions, please feel free in contacting me at (510) 632-3467 ext. 211.

Sincerely,

Dave Robinson  
Environmental Manager

*Manifest for tank?*

cc. Lester Feldman, Regional Water Quality  
Control Board  
John Sturman, Levine-Fricke  
Don Wixson, AB&I



# AMERICAN BRASS & IRON FOUNDRY

7825 San Leandro Street • Oakland, CA 94621 • (415) 632-3467

Fax No. (415) 632-8035

September 26, 1991

Mr. Barney M. Chan  
Hazardous Materials Specialists  
Alameda County Health Department  
80 Swan Way, Room 200  
Oakland, CA 94621

Re: Notice of violation letter dated July 30, 1991

Dear Mr. Chan:

This letter is in response to your notice of violation dated July 30, 1991. The following information outlines the American Brass and Iron Foundry Plan of correction for each individual item of concern during the inspection on April 10, 1991. In order to not circumvent the situation, each violation is stated proceeded by a plan of correction that AB&I will take to resolve these issues.

#### Violation Item

Section 25505(c) of the California Health and Safety Code (ch & sc) requires the handler (of the chemicals) shall review the business plan at least once every two years to determine if a revision is necessary of the hazardous materials management plan (HMMP)

#### Corrective Action Plan

On August 10, 1991 a revised copy of American Brass and Iron Foundry's HMMP was delivered to the County Health Office with all modification implemented to reflect current operating conditions. It will be the future practice of AB&I to include at a minimum a route yearly review of the plan and its entirety. Any major operational modifications pertaining to hazardous material management will be implements on a case by case basis.

#### Violation Item

Monitoring requirements for the permitting of underground tanks at AB&I facility location. Monitoring must comply with acceptable alternative described in Title 23, Subchapter 16 of California Underground Storage Tank Regulation.

#### Correction Action Plan

All Tanks in Question are presently in the process of being removed in accordance with AB&I Underground Tank Closure Plan submitted to the County of Alameda on August 1, 1991. In addition excavating permits no. 9478 and 9475 were obtained from the city



## AMERICAN BRASS & IRON FOUNDRY

91 Nov 6 1991  
7825 San Leandro Street • Oakland, CA 94621 • (415) 632-3467  
Fax No. (415) 632-8035

November 4, 1991

Mr. Barney Chan  
ALAMEDA COUNTY HEALTH AGENCY  
Room 200  
80 Swan Way  
Oakland, CA 94621

Dear Mr. Chan:

This letter is a proposal and request by American Brass and Iron Foundry to recycle an underground storage tank, removed on October 18, 1991, through normal operations of the foundry.

As we had discussed earlier, this appeal to both a valid and environmentally sound alternative for the disposal of one storage tank which once contained III Trichloroethane. During the removal process the tank was prepared for disposal and is now sitting at a designated location on AB&I property.

In reviewing guidelines for recycling a hazardous waste in California supplied by the department of toxic substance control, it appears AB&I falls in an unusual case. I have attached a copy of the report for your review and have highlighted specific areas. Our interpretation of the recycling laws and requirements allow us to recycle the tank on site since we are the original generator and since we presently recycle steel on site. AB&I has recycled scrap iron and steel for numerous years and has expanded our capabilities for handling the materials both environmentally and safely.

With the other disposal method consisting of landfill at Kettleman Hills, we feel the above proposal makes environmental sense and should be considered.

Please review our proposal and respond no later than 11-29-91, due mainly to the stringent disposal timeframe imposed by the state.



Mr. Barney Chan  
ALAMEDA COUNTY HEALTH AGENCY  
November 4, 1991  
Page 2

If you have further questions, please feel free in contacting  
me at (510) 632-3467.

Sincerely,

Dave Robinson  
Environmental Engineering Manager

DR/aw

cc: Don Wixson

**COMPILATION OF  
HAZARDOUS WASTE RECYCLING LAWS  
OF CALIFORNIA  
EFFECTIVE JANUARY 1, 1991**

The following definitions and requirements are excerpts from the California Hazardous Waste Control Law (Chapter 6.5, Division 20, Health and Safety Code). Laws specific to the recycling of used oil are not reprinted here.

Definitions

25110. Unless expressly incorporated by reference by another statute, the definitions in this article govern only the construction of this chapter. Until terms used in this chapter are defined in either this chapter or in regulations adopted to implement this chapter, the corresponding definitions found in the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. Sec. 6901 et seq.) and the regulations adopted pursuant to that act, shall apply to the terms used in this chapter.

(Amended by Stats. 1989, Ch. 1436.)

25113.

(a) **"Disposal"** means either of the following:

- (1) The discharge, deposit, injection, dumping, spilling, leaking, or placing of any waste so that the waste or any constituent of the waste is or may be emitted into the air or discharged into or on any land or waters, including groundwaters, or may otherwise enter the environment.
- (2) The abandonment of any waste.

(b) The amendment of the section made at the 1989-90 Regular Session of the Legislature does not constitute a change in, but is declaratory of, the existing law.

(Amended by Stats. 1989, Ch. 1436.)

25117.

(a) **"Hazardous waste"** means either of the following:

- (1) A waste, or combination of wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may either:
  - (A) Cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness.
  - (B) Pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of, or otherwise managed.
- (2) A waste which meets any of the criteria for the identification of a hazardous waste adopted by the department pursuant to Section 25141.

(b) "Hazardous waste" includes, but is not limited to, RCRA hazardous waste.

(c) Unless expressly provided otherwise, the term "hazardous waste" shall be understood to also include extremely hazardous waste and acutely hazardous waste.

(Amended by Stats. 1989, Ch. 1436.)

25117.9. **"Non-RCRA hazardous waste"** means all hazardous waste regulated in the state, other than RCRA hazardous waste, as defined in Section 25120.2. A hazardous waste regulated in the state is presumed to be RCRA hazardous waste, unless it is determined, pursuant to regulations adopted by the department, that the hazardous waste is a non-RCRA hazardous waste. Until the department adopts regulations to implement this section, a hazardous waste is presumed to be a RCRA hazardous waste, unless the generator of the waste determines the hazardous waste is not regulated as a hazardous waste under Subtitle C of the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. Sec. 6921 et seq.), pursuant to the process specified in Section 262.11 of Title 40 of the Code of Federal Regulations.

(Added by Stats. 1989, Ch. 1436.)

25120.2. **"RCRA hazardous waste"** means all waste identified as a hazardous waste in Part 261 (commencing with Section 261.1) of Subchapter I of Chapter 1 of Title 40 of the Code of Federal Regulations and appendixes thereto.

(Added by Stats. 1989, Ch. 1436.)

25120.5. **"Recyclable material"** means a hazardous waste that is capable of being recycled, including, but not limited to, any one of the following:

- (a) A residue.
- (b) A spent material, including, but not limited to, a used or spent stripping or plating solution or etchant.
- (c) A material that is contaminated to such an extent that it can no longer be used for the purpose for which it was originally purchased or manufactured.
- (d) A byproduct listed in the regulations adopted by the department as "hazardous waste from specific sources" or "hazardous waste from nonspecific sources."
- (e) Any retrograde material that has not been used, distributed, or reclaimed through treatment by the original manufacturer or owner by the later of the following dates:
  - (1) One year after the date when the material became a retrograde material.
  - (2) One year after the material is returned to the original manufacturer.

(Amended and renumbered by Stats. 1988, Ch. 1631.)

25121. **"Recycled material"** means a material which is used or reused, or reclaimed.

(Amended by Stats. 1988, Ch. 1631.)

25121.5.

- (a) **"Retrograde material"** means any hazardous material which is not to be used, sold, or distributed for use in an originally intended or prescribed manner or for an originally intended or prescribed purpose and which meets any one or more of the following criteria:
  - (1) Has undergone chemical, biochemical, physical, or other changes due to the passage of time or the environmental conditions under which it was stored.
  - (2) Has exceeded a specified or recommended shelf life.
  - (3) Is banned by law, regulation, ordinance, or decree.

25121.5(a) (cont.)

- (4) Cannot be used for reasons of economics, health or safety, or environmental hazard.
- (b) "Retrograde material" does not include material designated in regulations adopted by the department as included in a category which the department shall title "Discarded commercial chemical products, off-specification species, container residues, and spill residues thereof", if either of the following conditions is met:
  - (1) The material is used in a manner constituting disposal and the material is not normally used in a manner constituting disposal.
  - (2) The material is burned for energy recovery and the material is not normally burned for energy recovery.

(Amended by Stats. 1988, Ch. 1631.)

25123. **"Storage"** means the holding of hazardous wastes, for a temporary period.

(Added by Stats. 1988, Ch. 1632.)

25123.5. **"Treatment"** means any method, technique, or process which changes or is designed to change the physical, chemical, or biological character or composition of any hazardous waste or any material contained therein, or removes or reduces its harmful properties or characteristics for any purpose.

(Amended by Stats. 1988, Ch. 1632.)

25124.

- (a) **"Waste"** means any discarded material that is not excluded by this chapter or by regulations adopted pursuant to this chapter.
- (b) A discarded material is any material which is any of the following:
  - (1) Relinquished, as specified in subdivision (c).
  - (2) Recycled, as specified in subdivision (d).
  - (3) Considered inherently waste like, as specified in the regulations adopted by the department.



25124. (cont.)

- (c) A material is a waste if it is relinquished by being any of the following:
  - (1) Disposed of.
  - (2) Burned or incinerated.
  - (3) Accumulated, stored, or treated, but not recycled, before, or in lieu of, being relinquished by being disposed of, burned, or incinerated.
- (d) A material is a waste if it is recycled, or accumulated, stored, or treated before recycling, except as provided in Section 25143.2.
- (e) A material is a waste if it poses a threat to public health or the environment and meets either, or both, of the following conditions:
  - (1) It is mislabeled or not adequately labeled, unless the material is correctly labeled or adequately labeled within 10 days after the material is discovered to be mislabeled or inadequately labeled.
  - (2) It is packaged in deteriorated or damaged containers, unless the material is contained in sound or undamaged containers within 96 hours after the containers are discovered to be deteriorated or damaged.

(Amended by Stats. 1989, Ch. 1436.)

## Recyclable Materials

25143.2.

- (a) Recyclable materials are subject to the requirements of this chapter which apply to hazardous wastes, unless the department issues a variance pursuant to Section 25143, or except as provided otherwise in subdivision (b), (c), or (d) or the regulations adopted by the department pursuant to Sections 25150 and 25151. For purposes of this section, recyclable material does not include infectious waste.
- (b) Except as otherwise provided in subdivision (e), (f) and (g), recyclable material which is managed in accordance with Section 25143.9 and is or will be recycled by any of the following methods shall be excluded from classification as a waste:
- (1) Used or reused as an ingredient in an industrial process to make a product, if the material is not being reclaimed.
  - (2) Used or reused as a safe and effective substitute for commercial products, if the material is not being reclaimed.
  - (3) Returned to the original process from which the material was generated, without first being reclaimed, if the material is returned as a substitute for raw material feedstock, and the process uses raw materials as principal feedstocks.
- (c) Except as otherwise provided in subdivisions (b), (d), and (e), any recyclable material may be recycled at a facility which is not authorized by the department pursuant to the applicable hazardous waste facilities permit requirements of Article 9 (commencing with Section 25200) if either of the following requirements is met:
- (1) The material is a petroleum refinery waste containing oil which is converted into petroleum coke at the same facility at which the waste was generated, unless the resulting coke product would be identified as a hazardous waste under this chapter. A waste subject to this paragraph is exempt from this chapter to the same extent the waste is exempt from subsections (q), (r), and (s) of Section 6924 of Title 42 of the United States Code.

25143.2(c) (cont.)

- (2) The material meets all of the following conditions:
  - (A) The material is recycled and used at the same facility at which the material was generated.
  - (B) The material is recycled within 90 days of its generation.
  - (C) The material is managed in accordance with all applicable requirements for generators of hazardous wastes under this chapter and regulations adopted by the department.
- (d) Except as otherwise provided in subdivision (e), (f) and (g), recyclable material which meets the definition of a non-RCRA hazardous waste, in Section 25117.9, is managed in accordance with Section 25143.9, and meets or will meet any of the following requirements is excluded from classification as a waste:
  - (1) The material can be shown to be recycled and used at the site where the material was generated.
  - (2) The material qualifies as one or more of the following:
    - (A) The material is a product, which has been processed from a hazardous waste, or which has been handled, at a facility authorized by the department pursuant to the facility permit requirements of Article 9 (commencing with Section 25200) to process or handle the material, if the product meets both of the following conditions:
      - (i) The product does not contain constituents, other than those for which the material is being recycled which render the material hazardous under regulations adopted pursuant to Sections 25140 and 25141.
      - (ii) The product is used, or distributed or sold for use, in a manner for which the product is commonly used.
    - (B) The material is a petroleum refinery waste containing oil which is converted into petroleum coke at the same facility at which the waste was generated, unless the resulting coke product would be identified as a hazardous waste under this chapter.

25143.2(d)(2) (cont.)

- (C) The material is oily waste, used oil, or spent nonhalogenated solvent which is managed by the owner or operator of a refinery which is processing primarily crude oil and which is not subject to permit requirements for recycling of used oil, or a public utility, or a corporate subsidiary, corporate parent, or subsidiary of the same corporate parent of the refinery or public utility, and which meets all of the following requirements:
  - (i) The material is either burned in an industrial boiler, an industrial furnace, an incinerator, or a utility boiler which complies with all applicable federal and state laws, or is recombined with normal process streams to produce a fuel.
  - (ii) The material is managed at the site where it was generated; managed at another site owned or operated by the generator, a corporate subsidiary of the generator, a subsidiary of the same entity of which the generator is a subsidiary, or the corporate parent of the generator; or, if the material is generated in the course of oil or gas exploration or production, managed by an unrelated refinery receiving the waste through a common pipeline.
  - (iii) The material does not contain constituents other than those for which the material is being recycled which render the material hazardous under regulations adopted pursuant to Sections 25140 and 25141.
- (3) The material is transported between locations operated by the same person who generated the material, if the material is recycled at the last location operated by that person and all of the conditions of clauses (i) to (vi), inclusive, of subparagraph (A) of paragraph (4) are met. If requested by the department or by any law enforcement official, a person handling material subject to this paragraph shall, within 15 days of the request, supply documentation to show that the requirements of the paragraph have been satisfied.
- (4) (A) The material is transferred between locations operated by the same person who generated the material, if the material is to be recycled at an authorized offsite hazardous waste facility and if all of the following conditions are met:

25143.2(d)(4)(A) (cont.)

- (i) The material is transferred by employees of that person in vehicles under the control of that person or by a registered hazardous waste hauler under contract to that person.
- (ii) The material is not handled at any interim location.
- (iii) The material is not held at any publicly accessible interim location for more than four hours unless required by other provisions of law.
- (iv) The material is managed in compliance with the requirements of this chapter and the regulations adopted pursuant to this chapter prior to the initial transportation of the material and after the receipt of the material at the last location operated by that person. Upon receipt of the material at the last location operated by that person, the material shall be deemed to have been generated at that location.
- (v) All of the following information is maintained in an operating log at the last location operated by that person:
  - (I) The name and address of each generator location contributing material to each shipment received.
  - (II) The quantity and type of material contributed by each generator to each shipment of material.
  - (III) The destination and intended disposition of all material shipped offsite or received.
  - (IV) The date of each shipment received or sent offsite.

The log shall be kept for at least three years after receipt of the material at that location.
- (vi) If requested by the department, or by any law enforcement official, a person handling material subject to this paragraph shall, within 15 days of the request, supply documentation to show that the requirements of this paragraph have been satisfied.

25143.2(d)(4) (cont.)

- (B) For purposes of paragraph (3) and subparagraph (A) of paragraph (4), "person" also includes corporate subsidiary, corporate parent, or subsidiary of the same corporate parent.
- (C) Persons which are a corporate subsidiary, corporate parent, or subsidiary of the same corporate parent, and which manage recyclable materials under paragraph (3) or subparagraph (A) of paragraph (4), are jointly and severally liable for any activities exempt from regulation pursuant to this section.
- (5) The material is a container which meets all of the following requirements:
  - (A) The container was last used to hold a hazardous material acquired from a supplier of hazardous materials.
  - (B) The container is empty pursuant to the standards set forth in Section 261.7 of Title 40 of the Code of Federal Regulations.
  - (C) The container is returned to a supplier of hazardous materials for the purpose of being refilled.
  - (D) The container is not treated prior to being returned to the supplier of hazardous materials, except as provided in regulations adopted by the department.
  - (E) The container is not treated by the supplier of hazardous materials except by rinsing.
  - (F) The container is refilled by the supplier with hazardous material which is compatible with the hazardous material which the container previously held unless the container has been adequately rinsed.
  - (G) The container is handled in accordance with any regulations adopted by the department to implement this paragraph.

25143.2(d) (cont.)

- (6) The material is used or reused as an ingredient in an industrial process to make a product, if the material is not being treated before introduction to that process except by one or more of the following procedures, and if any discharges to air from the following procedures do not contain constituents which are hazardous waste pursuant to the department's regulations and comply with applicable air pollution control laws:
  - (A) Filtering.
  - (B) Screening.
  - (C) Sorting.
  - (D) Sieving.
  - (E) Grinding.
  - (F) Physical or gravity separation, without chemical additive or the addition of external heat.
  - (G) PH adjustment.
  - (H) Viscosity adjustment.
  
- (7) The material is used or reused a safe and effective substitute for commercial products, if the material is not being treated except by one or more of the following procedures, and if any discharges to air from the following procedures do not contain constituents which are hazardous wastes pursuant to the department's regulations and comply with applicable air pollution control laws:
  - (A) Filtering.
  - (B) Screening.
  - (C) Sorting.
  - (D) Sieving.
  - (E) Grinding.

25143.2(d)(7) (cont.)

- (F) Physical or gravity separation, without any chemical additive or the addition of external heat.
  - (G) PH adjustment.
  - (H) Viscosity adjustment.
- (e) Notwithstanding subdivisions (b), (c), and (d), all of the following recyclable materials are hazardous wastes and subject to full regulation under this chapter, even if the recycling involves use, reuse, or return to the original process as described in subdivision (b), or even if the recycling involves activities or materials described in subdivisions (c) and (d):
- (1) Materials which are a RCRA<sup>1</sup> hazardous waste, as defined in Section 25120.2, used in a manner constituting disposal, or used to produce products that are applied to the land including, but not limited to, materials used to produce a fertilizer, soil amendment, agricultural mineral, or an auxiliary soil and plant substance. The department may adopt regulations to exclude materials from regulation pursuant to this paragraph.
  - (2) Materials which are a non-RCRA hazardous waste, as defined in Section 25117.9, and used in a manner constituting disposal or used to produce products that are applied to the land as a fertilizer, soil amendment, agricultural mineral, or an auxiliary soil and plant substance. The department may adopt regulations to exclude materials from regulation pursuant to this paragraph.
  - (3) Materials burned for energy recovery, used to produce a fuel, or contained in fuels, except materials exempted under paragraph (1) of subdivision (c) or excluded under subparagraph (B) or (C) of paragraph (2) of subdivision (d).
  - (4) Materials accumulated speculatively.
  - (5) Materials determined to be inherently wastelike pursuant to regulations adopted by the department.
  - (6) Used or spent etchants, stripping solutions, and plating solutions, which are transported to an offsite facility operated by a person other than the generator and which conform to either of the following:



25143.2(e)(6) (cont.)

- (A) Meet a characteristic or a criterion of a hazardous waste established by the Environmental Protection Agency or the department.
  - (B) Are listed by the Environmental Protection Agency or the department as a hazardous waste.
- (7) Used oil, as defined in subdivision (a) of Section 25250.1, unless one of the following applies:
- (A) The used oil meets the definition of recycled oil contained in subdivision (c) of Section 25250.1.
  - (B) The used oil is excluded under subparagraph (B) or (C) of paragraph (2) of subdivision (d) or under paragraph (4) of subdivision (d) of this section, under subdivision (e) of Section 25250.1, or under Section 25250.3.
  - (C) The used oil is used or reused on the site where it was generated or is excluded under paragraph (3) of subdivision (d) of this section and, in either situation, is not any of the following:
    - (i) Used in a manner constituting disposal or used to produce a product that is applied to land.
    - (ii) Burned for energy recovery or used to produce a fuel, unless the used oil is excluded under subparagraph (B) or (C) of paragraph (2) of subdivision (d).
    - (iii) Accumulated speculatively.
    - (iv) Determined to be inherently wastelike pursuant to regulations adopted by the department.
- (f) (1) Any person who manages a recyclable material under a claim that the material qualifies for exclusion or exemption pursuant to this section shall provide, upon request, to the department, the Environmental Protection Agency, or any local agency or official authorized to bring an action as provided in Section 25180, all of the following information:

25143.2(f)(1) (cont.)

- (A) The name, street and mailing address, and telephone number of the owner or operator of any facility that manages the material.
  - (B) Any other information related to that person's management of the material requested by the department, the Environmental Protection Agency or the authorized local agency or official.
- (2) Any person claiming an exclusion or an exemption shall maintain adequate records to demonstrate to the satisfaction of the requesting agency or official that there is a known market or disposition for the material, and that the requirements of any exemption or exclusion pursuant to this section are met.
- (3) For purposes of determining that the conditions for exclusion from classification as a waste pursuant to this section are met, any person, facility, site, or vehicle engaged in the management of a material under a claim that the material is excluded from classification as a waste pursuant to this section shall be subject to Section 25185.
- (g) For purposes of Chapter 6.8 (commencing with Section 25300), recyclable materials excluded from classification as a waste pursuant to this section are not excluded from the definition of hazardous substances in subdivision (g) of Section 25316.

(Amended by Stats. 1990, Ch. 1686.)

25143.3. The Environmental Protection Agency regulations regarding spent sulfuric acid as set forth in Section 261.4 (a) (7) of Title 40 of the Code of Federal Regulations (50 Fed. Reg 665) are the regulations of the department and shall remain in effect until the department adopts regulations regarding this subject. It is the intent of the Legislature that the regulations adopted by the department be at least equivalent to, and in substantial conformance with that Section 261.4 (a) (7). Further, it is the intent of the Legislature that the department may define in the regulations the term "spent sulfuric acid" as it deems necessary to avoid sham recycling, as described on page 638 of Volume 50 of the Federal Register by the Environmental Protection Agency.

(Added by Stats. 1985, Ch. 1594.)

25143.9. A recyclable material shall not be excluded from classification as a waste pursuant to subdivision (b) or (d) of Section 25143.2, unless all of the following requirements are met:

- (a) If the material is held in a container or tank, the container or tank is labeled, marked, and placarded in accordance with the department's hazardous waste labeling, marking, and placarding requirements which are applicable to generators, except that the container or tank shall be labeled or marked clearly with the words "Excluded Recyclable Material" instead of the words "Hazardous Waste," and manifest document numbers are not applicable.
- (b) The owner or operator of the business location where the material is located has a business plan that meets the requirements of Section 25504, including, but not limited to, emergency response plans and procedures, as described in subdivision (b) of Section 25504, which specifically address the material or that meet the department's emergency response and contingency requirements which are applicable to generators of hazardous waste.
- (c) The material shall be stored and handled in accordance with all local ordinances and codes, including, but not limited to, fire codes, governing the storage and handling of the hazardous material. If a local jurisdiction does not have an ordinance or code regulating the storage of the material, including, but not limited to, an ordinance or code requiring secondary containment for hazardous material storage areas, then the material shall be stored in tanks, waste piles, or containers meeting the department's regulations establishing design standards which would be applicable to tanks, waste piles, or containers if the material were not exempt from classification as a hazardous waste.
- (d) If the material is being exported to a foreign country, the person exporting the material shall do all of the following:
  - (1) Notify the department, in writing, four weeks before the initial shipment. The notification may cover export activities extending over a 12 month or lesser period and shall include all of the following information:
    - (A) The generator's name, site address, mailing address, telephone number, Environmental Protection Agency or state identification number, if applicable, contact person, and signature of exporter.
    - (B) Each transporter's name, address, telephone number, Environmental Protection Agency or state identification number, if applicable, name of contact person, mode of transportation, and container type used during transport.

25143.9(d)(1) (cont.)

- (C) A description of the material and, if applicable, United States Department of Transportation proper shipping name, hazard class, and shipping identification number (UN/NA).
  - (D) The estimated frequency of shipments and total quantity of material to be exported.
  - (E) All points of departure from the state and intended destinations.
  - (F) The receiving facility's or facilities' name and address.
  - (G) A description of the end use of the material and the basis for the specific exemption provided in section 25143.2 which is applicable to the material.
- (2) For each individual shipment, submit to the department, within 90 days of shipment date, a copy of the waybill, shipping paper, or any document which includes all of the following information specific to that shipment:
- (A) The generator's or generators' name and address.
  - (B) The receiving facility's or facilities' name and address.
  - (C) The date of shipment.
  - (D) The type, quantity, and value of the material.

(Added by Stats. 1990, Ch. 1686.)

# ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

## Hazardous Materials Division Inspection Form

Site ID# \_\_\_\_\_ Site Name American Brass + Iron Today's Date 8/26/91  
 Site Address 7825 San Leandro St EPA ID# \_\_\_\_\_  
 City Oakland Zip 94620 Phone \_\_\_\_\_

MAX Amt. Stored > 500lbs/55g/200cf? **Y N**  
 Hazardous Waste generated per month? \_\_\_\_\_

**Inspection Categories:**

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

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

**I.A. GENERATOR (Title 22)**

- |                          |                             |         |
|--------------------------|-----------------------------|---------|
| ___                      | 1. Waste ID                 | * 66471 |
| ___                      | 2. EPA ID                   | 66472   |
| ___                      | 3. > 90 days                | 66508   |
| ___                      | 4. Label dates              | 66508   |
| ___                      | 5. Biennial                 | 66493   |
| <b>Manifest</b>          |                             |         |
| ___                      | 6. Records                  | 66492   |
| ___                      | 7. Correct                  | 66484   |
| ___                      | 8. Copy sent                | 66492   |
| ___                      | 9. Exception                | 66484   |
| ___                      | 10. Copies Rec'd            | 66492   |
| <b>Misc.</b>             |                             |         |
| ___                      | 11. Treatment               | 66371   |
| ___                      | 12. On-site Disp. (H.S.&C.) | 261895  |
| ___                      | 13. Ex Haz. Waste           | 66570   |
| <b>Prevention</b>        |                             |         |
| ___                      | 14. Communications          | 67121   |
| ___                      | 15. Aisle Space             | 67124   |
| ___                      | 16. Local Authority         | 67126   |
| ___                      | 17. Maintenance             | 67120   |
| ___                      | 18. Training                | 67105   |
| <b>Confin. gency</b>     |                             |         |
| ___                      | 19. Prepared                | 67140   |
| ___                      | 20. Name List               | 67141   |
| ___                      | 21. Copies                  | 67141   |
| ___                      | 22. Emg. Coord. Trng.       | 67144   |
| <b>Containers, Tanks</b> |                             |         |
| ___                      | 23. Condition               | 67241   |
| ___                      | 24. Compatibility           | 67242   |
| ___                      | 25. Maintenance             | 67243   |
| ___                      | 26. Inspection              | 67244   |
| ___                      | 27. Buffer Zone             | 67246   |
| ___                      | 28. Tank Inspection         | 67259   |
| ___                      | 29. Containment             | 67245   |
| ___                      | 30. Safe Storage            | 67261   |
| ___                      | 31. Freeboard               | 67257   |

**Comments:**

observed removal of 1 550 gal  
 UST, gas, O<sub>2</sub> 0%, LEL 2%

No obvious holes were observed in the tank

2 soil samples collected from within tank excavation

I North wall at 8.5'  
 II South wall at 6'

One composite sample of spoils pile was collected,

One hour fifteen minute time commitment

**I.B. TRANSPORTER (Title 22)**

- |                 |                           |       |
|-----------------|---------------------------|-------|
| ___             | 32. Applic./Insurance     | 66428 |
| ___             | 33. Comp. Cert./CHP Insp. | 66448 |
| ___             | 34. Containers            | 66465 |
| <b>Manifest</b> |                           |       |
| ___             | 35. Vehicles              | 66465 |
| ___             | 36. EPA ID #s             | 66531 |
| ___             | 37. Correct               | 66541 |
| ___             | 38. HW Delivery           | 66543 |
| ___             | 39. Records               | 66544 |
| <b>Cont's</b>   |                           |       |
| ___             | 40. Name/ Covers          | 66545 |
| ___             | 41. Recyclables           | 66800 |

Rev 6/88

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

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

Signature: \_\_\_\_\_

Inspector: \_\_\_\_\_

Signature: O. Gann



## AMERICAN BRASS & IRON FOUNDRY

7825 San Leandro Street • Oakland, CA 94621 • (415) 632-3467  
Fax No. (415) 632-8035

August 16, 1991

Mr. Barney Chan  
DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Room 200  
Oakland, CA 94621

Re: Notice of Violation

Dear Mr. Chan:

I am requesting a two week extension on a reply to the Notice of Violation. Information that I would like to include in the reply will not be available until the week of August 26, 1991. As I will be on a two-week vacation beginning on August 19, I will not be able to finish the reply.

Respectfully,

Don Wixson  
Plant Engineer

DW/sr

91 AUG 16 11:10 AM '91

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 yellow -facility  
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH  
 Hazardous Materials Inspection Form

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

II, III

Site ID # \_\_\_\_\_ Site Name American Brass + Iron Today's Date 8/8/91

II.A BUSINESS PLANS (Title 19)

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

Site Address 7825 San Leandro Street  
 City Oakland Zip 94 Phone \_\_\_\_\_

II.B ACUTELY HAZ. MAT'LS

- \_\_\_ 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

Inspection Categories:

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

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  
Semi-annual groundwater  
One time soils
    - 3) Daily Vadose  
One time soils  
Annual tank test
    - 4) Monthly Groundwater  
One time soils
    - 5) Daily Inventory  
Annual tank testing  
Cont pipe leak det  
Vadose/gndwater mon.
    - 6) Daily Inventory  
Annual tank testing  
Cont pipe leak det
    - 7) Weekly Tank Gauge  
Annual tank testing
    - 8) Annual Tank Testing  
Daily Inventory
    - 9) Other \_\_\_\_\_

- \_\_\_ 7. Precs Tank Test 2643  
Date: \_\_\_\_\_
- \_\_\_ 8. Inventory Rec. 2644
- \_\_\_ 9. Soil Testing . 2646
- \_\_\_ 10. Ground Water. 2647

- New Tanks
- \_\_\_ 11. Monitor Plan 2632
  - \_\_\_ 12. Access. Secure 2634
  - \_\_\_ 13. Plans Submitt  
Date: \_\_\_\_\_ 2711
  - \_\_\_ 14. As Built 2635  
Date: \_\_\_\_\_

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

10:10-11:10 11:45-

Comments:

On-site to witness removal of one (1) 8,000 gallon gasoline tank. Others present include: John Sturman of Levine-Fricke; John Fehring (ABI); Eng. Jim Edwards of OFD; and an equipment operator from Walt's Backhoe. An initial administrative difficulty was encountered when it was discovered that no appropriately-licensed contractor had been assigned to overall project oversight. A mutual agreement was reached to place the project under supervision of Walt's Backhoe. \* The closure plan has been amended to reflect this fact. Three (3) other tanks will be closed at a later date, although this number is still being debated. LEL/O<sub>2</sub> levels checked by OFD as < 10% each. Tank pulled ~ 12:15 using two skip loaders. Top wrapping tattered and partially dissolved at north end of tank. Brown "product" (?) floating on shallow GW at depth of ~ 11 feet BG in tank pit. Both soil (sidewalls) and GW sample to be collected. Although the tank looks sound (ie, no obvious throughgoing holes) there is an obvious odor of product in the pit, perhaps from historical overspillage.

II, III

Contact: John Fehring  
 Title: ABI contact  
 Signature: John P. Fehring

Inspector: [Signature]  
 Signature: [Signature]

white -env.health  
yellow -facility  
pink -files

# ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

## Hazardous Materials Inspection Form

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

II, III

Site ID # \_\_\_\_\_ Site Name ABI Today's Date 8/8/91

Site Address 7825 San Leandro St.

City Oakland Zip 946 Phone \_\_\_\_\_

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

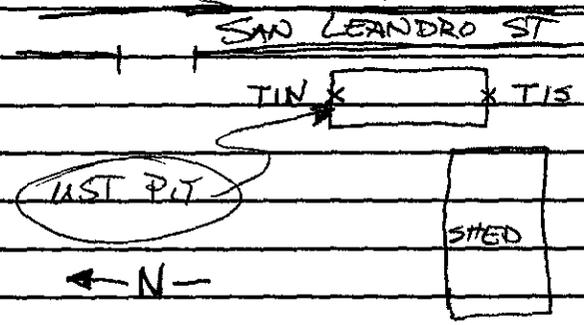
### Inspection Categories:

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

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

### Comments:

Samples were taken from either end of the tank at GW/unsaturated interphase, and designated TIN-10.5 and TIS-11



Three (3) 40ml VOA water samples ~~was~~ <sup>were</sup> collected using a disposable PVC bailer. After sampling, GW was removed from pit using pump and transferred to 55-gallon drums.

### 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)

### II.B ACUTELY HAZ. MAT'L'S

- 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(a)
- 15. Probable Risk Assessment 25534(d)
- 16. Persons Responsible 25534(g)
- 17. Certification 25534(f)
- 18. Exemption Request? (Y/N) 25536(b)
- 19. Trade Secret Requested? 25538

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- 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 Semi-annual groundwater One time soils
    - 3) Daily Vadose One time soils Annual tank test
    - 4) Monthly Groundwater One time soils
    - 5) Daily Inventory Annual tank testing Cont pipe leak det Vadose/groundwater mon.
    - 6) Daily Inventory Annual tank testing Cont pipe leak det
    - 7) Weekly Tank Gauge Annual tank testing
    - 8) Annual Tank Testing Daily Inventory
    - 9) Other \_\_\_\_\_
  - 7. Precs Tank Test Date: \_\_\_\_\_ 2643
  - 8. Inventory Rec. 2644
  - 9. Soil Testing . 2646
  - 10. Ground Water. 2647

- New Tanks
- 11. Monitor Plan 2632
  - 12. Access. Secure 2634
  - 13. Plans Submit Date: \_\_\_\_\_ 2711
  - 14. As Built Date: \_\_\_\_\_ 2635

Rev 8/88

Contact: John Fehring  
Title: ABI contact  
Signature: John Fehring

Inspector: \_\_\_\_\_  
Signature: [Signature]

II, III



<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. C A D D 0 2 1 7 7 4 5 5 9 0 0 0 0 1		Manifest Document No. 1		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address <b>AMERICAN BRASS AND IRON FOUNDRY</b> 7825 San Leandro Street, Oakland, CA. 94621						A. State Manifest Document Number <b>90546536</b>					
4. Generator's Phone (415) 632-3467						B. State Generator's ID					
5. Transporter 1 Company Name <b>H &amp; H Ship Service Company</b>			6. US EPA ID Number C A D D 0 4 7 7 1 1 1 6 1 8			C. State Transporter's ID 200582		D. Transporter's Phone (415) 543-4836			
7. Transporter 2 Company Name						E. State Transporter's ID					
8. US EPA ID Number						F. Transporter's Phone					
9. Designated Facility Name and Site Address <b>H &amp; H Ship Service Company</b> 220 China Basin Street San Francisco, CA 94107			10. US EPA ID Number C A D D 0 4 7 7 1 1 1 6 1 8			G. State Facility's ID		H. Facility's Phone (415) 543-4836			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)					12. Containers		13. Total Quantity		14. Unit		
a. RESIDUE GASOLINE TANK NON-RCRA HAZARDOUS WASTE SOLID					No. Type		WT/Vol		Waste No.		
					0 0 1 1 P 0 0 0 0 0 0 P				State 512 EPA/Other		
b. RESIDUE ASSOCIATED PIPING NON-RCRA HAZARDOUS WASTE SOLID					0 0 2 C V 0 0 0 0 2 0 P				State 513 EPA/Other		
c.									State EPA/Other		
d.									State EPA/Other		
J. Additional Descriptions for Materials Listed Above EMPTY 8,000 gallon tank last containing gasoline. Tank inerted with dry ice for transport. RESIDUE ASSOCIATED PIPING. PROFILE #A1119						K. Handling Codes for Wastes Listed Above					
						a. 01		b. 01			
						c.		d.			
15. Special Handling Instructions and Additional Information JOB #8080 24 Hr. Emergency Contact: H & H #(415) 543-4836 APPROPRIATE PROTECTIVE CLOTHING AND RESPIRATOR											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable International and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.											
Printed/Typed Name JOHN FERRINGER				Signature <i>John Ferringer</i>				Month Day Year 10 18 19 13			
17. Transporter 1 Acknowledgement of Receipt of Materials				Printed/Typed Name MARTIN J. COSTELLO				Signature <i>Martin J. Costello</i>		Month Day Year 10 18 19 13	
18. Transporter 2 Acknowledgement of Receipt of Materials				Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space											
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest, except as noted in Item 19.											
Printed/Typed Name Cleveland Valley				Signature <i>Cleveland Valley</i>				Month Day Year 10 28 19 13			

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-6362, WITHIN CALIFORNIA CALL 1-800-543-7882  
 GENERATOR  
 TRANSPORTER  
 FACILITY

Do Not Write Below This Line

Yellow: SPP SENDS THIS COPY TO GENERATOR WITHIN 30 DAYS



## **AMERICAN BRASS & IRON FOUNDRY**

---

7825 San Leandro Street • Oakland, CA 94621 • (415) 632-3467

Fax No. (415) 632-8035

Project Specialist (print) Barney Chen  
8/7/91 blb

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

ACCEPTED

DEPARTMENT OF ENVIRONMENTAL HEALTH  
470 - 27th Street, Third Floor  
Oakland, CA 94612  
Telephone: (415) 874-7237

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

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

Any change or alterations of these plans and specifications must be submitted to this Department and to the Fire and Building Inspection Department to determine if such changes meet the requirements of State and local laws.

Notify this Department at least 48 hours prior to the following required inspections:

- tank 8-8-91 \_\_\_\_\_ Removal of Tank and Piping
- \_\_\_\_\_ Sampling
- \_\_\_\_\_ Final Inspection

Issuance of a permit to operate is dependent on compliance with accepted plans and all applicable laws and regulations.

THERE IS A FINANCIAL PENALTY FOR NOT OBTAINING THESE INSPECTIONS.

UNDERGROUND TANK CLOSURE PLAN

\* \* \* Complete according to attached instructions \* \* \*

1. Business Name AMERICAN BRASS AND IRON FOUNDRY  
Business Owner ALLAN BOSCACCI Contact: John Fehringer  
632-3467
2. Site Address 7825 SAN LEANDRO STREET  
city OAKLAND Zip 94621 Phone (415)632-3467
3. Mailing Address 7825 SAN LEANDRO STREET  
city OAKLAND Zip 94621 Phone (415)632-3467
4. Land Owner ALLAN BOSCACCI  
Address 7825 SAN LEANDRO ST. city, state OAKLAND, CA zip 94621
5. Generator name under which tank will be manifested AMERICAN BRASS AND IRON FOUNDRY  
EPA I.D. No. under which tank will be manifested CA0021774559

8-8-91

6. Contractor (SAME AS OWNER) Walt's Backhoe Service  
Address 2719 Foothill Blvd  
City Oakland Phone 532-2026  
License Type Eng. A ? ID# 39933

7. Consultant LEVINE - FRICKE  
Address 1900 POWELL STREET, 12TH FLOOR  
City EMERYVILLE Phone (415) 652-4500

8. Contact Person for Investigation  
Name JOHN STURMAN Title SENIOR PROJECT GEOTECHNICAL ENGINEER  
Phone (415) 652-4500

9. Number of tanks being closed under this plan 3  
Length of piping being removed under this plan APP. 10 FT. PER TANK  
Total number of tanks at facility 4

10. State Registered Hazardous Waste Transporters/Facilities (see instructions).

\*\* Underground tanks are hazardous waste and must be handled \*\*  
as hazardous waste

a) Product/Residual Sludge/Rinsate Transporter

Name EVERGREEN ENVIRONMENTAL SERVICES EPA I.D. No. CA0980695761  
Hauler License No. \_\_\_\_\_ License Exp. Date \_\_\_\_\_  
Address 6880 SMITH ROAD  
city NEWARK state CA zip 94560

b) Product/Residual Sludge/Rinsate Disposal Site

Name EVERGREEN ENVIRONMENTAL EPA I.D. No. CA0980887418  
Address 6880 SMITH ROAD  
city NEWARK state CA zip 94560

c) Tank and Piping Transporter

Name HIH SHIP SERVICE EPA I.D. No. CAD004771168

Hauler License No. 0334 License Exp. Date 1/31/92

Address 220 CHINA BASIN STREET

city SAN FRANCISCO State CA zip 94107

d) Tank and Piping Disposal Site

Name SAME AS TRANSPORTER EPA I.D. No. \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

11. Experienced Sample Collector

Name JOHN STURMAN

Company LEVINE FRICKE

Address 1900 POWELL STREET

city EMERYVILLE state CA zip 94608 Phone (415) 652-4500

12. Laboratory

Name BC ANALYTICAL

Address 1255 POWELL STREET

city EMERYVILLE state CA zip 94608

State Certification No. 1353

13. Have tanks or pipes leaked in the past? Yes [ ] No []

If yes, describe. \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

14. Describe methods to be used for rendering tank inert

1) PRODUCT AND SLUDGE REMOVAL

2) RINSING PIPING AND TANKS

3) DRY ICE

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

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

15. Tank History and Sampling Information

Tank		Material to be sampled (tank contents, soil, ground-water, etc.)	Location and Depth of Samples
Capacity	Use History (see instructions)		
② 550 GAL	REGULAR GASOLINE STORED, INSTALLATION DATE UNKNOWN, LAST USED AUGUST 1971.	SOIL, GROUNDWATER IF SOIL IS CONTAMINATED OR IF GROUNDWATER IS PRESENT IN THE EXCAVATION	SOIL - 1" INTO NATIVE SOIL WATER - AT STATIC WATER LEVEL IN EXCAVATION

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

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15. Tank History and Sampling Information

Tank		Material to be sampled (tank contents, soil, ground-water, etc.)	Location and Depth of Samples
Capacity	Use History (see instructions)		
④ 8000 GAL.	TCA (1,1,1 TRICHLOROETHANE) STORED. INSTALLATION DATE UNKNOWN. LAST USED AUGUST 1991.	SOIL, GROUNDWATER IF SOIL IS CONTAMINATED OR IF GROUND WATER IS PRESENT IN THE EXCAVATION	SOIL - 1" INTO NATIVE SOIL WATER - AT STATIC WATER LEVEL IN EXCAVATION  2 sples, minimum at each end of tank

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

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3) DRY ICE

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

15. Tank History and Sampling Information

Tank		Material to be sampled (tank contents, soil, ground-water, etc.)	Location and Depth of Samples
Capacity	Use History (see instructions)		
③ 8000 GAL	UNLEADED FUEL STORED. INSTALLATION DATE UNKNOWN, LAST USED AUGUST 1991.	SOIL, GROUNDWATER IF SOIL IS CONTAMINATED OR IF GROUNDWATER IS PRESENT IN THE EXCAVATION	SOIL - 1' INTO NATIVE SOIL WATER - AT STATIC WATER LEVEL IN EXCAVATION Minimum 2 spels 1 at each end of tank

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



Excavated/Stockpiled Soil	
Stockpiled Soil Volume (Estimated)	Sampling Plan <i>1 discrete sample per 20 cubic yds for reuse.</i>

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

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

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

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Method Number	Method Detection Limit
GAS TANKS { TPH GASOLINE BTXE	EPA 5030	EPA METHOD 8015	1 PPM SOIL 0.050 PPM WATER
	SAME	EPA METHOD 8020	0.005 PPM SOIL 0.0005 PPM WATER
SOLVENT TANK { CHLORINATED SOLVENTS		EPA METHOD 8010	0.010 PPM SOIL 0.0005 PPM WATER

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

18. Submit Worker's Compensation Certificate copy

Name of Insurer SELF INSURED TO \$ 400,000. TRANSAMERICA  
INSURANCE COMPANY THEREAFTER

19. Submit Plot Plan (See Instructions)

20. Enclose Deposit (See Instructions)

21. Report any leaks or contamination to this office within 5 days of discovery. The report shall be made on an Underground Storage Tank Unauthorized Leak/Contamination Site Report form. (see Instructions)

22. Submit a closure report to this office within 60 days of the tank removal. This report must contain all the information listed in item 22 of the instructions.

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true.

I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel health and safety. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

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

Signature of Contractor

Name (please type) JOHN P. FEHRINGER

Signature John P. Fehringer

Date 8/1/91

Signature of Site Owner or Operator

Name (please type) JOHN P. FEHRINGER

Signature John P. Fehringer

Date 8/1/91

DEPARTMENT OF INDUSTRIAL RELATIONS  
SELF-INSURANCE PLANS

848 Arden Way, Suite 105  
Sacramento, CA 95825  
Phone (916) 924-4866  
FAX (916) 920-7095



Our File: 1046

Mr. Paul Quezada  
Personnel Manager  
AMERICAN BRASS & IRON FOUNDRY  
7825 San Leandro Street  
Oakland, CA 94621

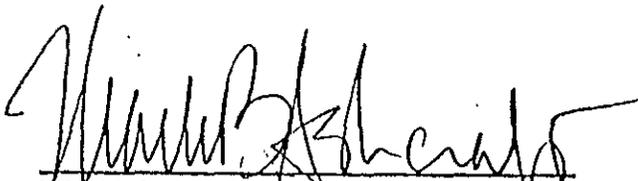
RECEIPT AND ACCEPTANCE OF IRREVOCABLE LETTER OF  
CREDIT AMENDMENT FOR AMERICAN BRASS & IRON FOUNDRY

THIS CERTIFIES that the above-named self-insurer has this day deposited with the Director of Industrial Relations of the State of California, to be held subject to the order of the said Director, under Section 3700 to 3705 of the Labor Code of California, the following described Irrevocable Letter of Credit:

Amendment No. 5, dated April 19, 1991, to be attached to and form a part of Bank of the West Irrevocable Standby Letter of Credit No. S-2069/054, for American Brass & Iron Foundry, said Amendment decreasing the penalty of said Letter of Credit from \$970,000 to \$400,000.

Total Deposit - Letter of Credit	\$400,000
Total Deposit - Surety Bond	\$ -0-
Total Deposit - Securities	\$ -0-
Total Deposit - Cash/Certificate of Deposit	\$ -0-
<b>TOTAL DEPOSIT</b>	<b>\$400,000</b>

Dated at Sacramento, California  
This 26th day of April, 1991

  
MARK B. ASHCRAFT, Manager  
Self-Insurance Plans

dc  
cc: Bank of the West  
Internation Department  
180 Montgomery Street  
San Francisco, CA 94104

# SPECIFIC EXCESS WORKERS COMPENSATION POLICY

## TRANSAMERICA INSURANCE COMPANY

(A Stock Company, herein called the "Company")

6300 Canoga Avenue, Woodland Hills, California 91367

WEXFORD UNDERWRITING MANAGERS, INC.

280 California Street, Suite 900, San Francisco, CA 94111

POLICY NUMBER: W - 141719A

## DECLARATIONS

- ITEM 1 - Name and Address of Insured: American Brass & Iron Foundry  
7825 San Leandro Street  
Oakland, California 94521
- ITEM 2 - Effective Date: October 4, 1990  
12:01 A.M., standard time at the address of the Insured as stated herein.  
Expiration Date: October 4, 1991  
Cancellation Notice: 30 Days
- ITEM 3 - Coverage under this Policy applies to the Workers Compensation Act of each of the following states:  
California
- ITEM 4 - Company's Limit of Indemnity Each Occurrence:  
(a) For Workers Compensation: \$ 10,000,000  
(b) For Employers Liability: \$ 1,000,000  
(c) For Workers Compensation & Employers Liability Combined: \$ 10,000,000
- ITEM 5 - Insured's Retention Each Occurrence: \$300,000
- ITEM 6 - Business Operations of Insured

CLASSIFICATION OF OPERATIONS	CODE NO.	ESTIMATED ANNUAL REMUNERATION	RATE PER \$100 REMUNERATION	ESTIMATED STANDARD PREMIUM
All Operations		\$6,070,000		
Total Estimated Manual Premium:				\$838,000
ITEM 7	- Policy Premium: \$43,370 adjustable at .7145 per \$100 of Payroll		Advance Premium for this Policy:	\$43,370
ITEM 8	- Minimum Premium for this Policy: \$43,370			
ITEM 9	- Endorsements forming part of Policy at time of issue: None			

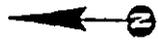
The declarations shall not be binding on the Company unless countersigned by a duly authorized representative of the Company.  
Dated at San Francisco, Calif this 15<sup>th</sup> day of October, 1990.

By [Signature]  
(Authorized Representative)

Producer's Name: Swett & Crawford of San Francisco

Producer's Code: WP - 0108

SAN LEANDRO ST.



77TH AVE.

Employee Parking

Roto Clone

Pipe Finishing

Shipping Area

Herman Building

Foundry

Sump

Bag House

Ditch

Elmhurst Canal

Well

18

2

23

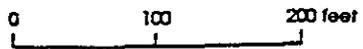
3

12

4

SPT Co. Tracks

GROUND WATER DEPTH - APP. 10 FT.



11

11

## PLOT PLAN

① 6000 gal UNLEADED STORAGE TANK

①a UNLEADED DISPENSER

② 550 gal REGULAR STORAGE TANK

②a REGULAR DISPENSER

③ 8000 gal TCA STORAGE TANK

④ 12000 gal DIESEL STORAGE TANK

④a DIESEL DISPENSER

----- MAIN POWER LINE (UNDERGROUND)

UNDERGROUND SERVICE ALERT WILL CONFIRM  
LOCATIONS OF LINES BY 8/7/91

## INSTRUCTIONS

### General Instructions

- \* Three (3) copies of this plan plus attachments and deposit must be submitted to this Department.
- \* Any cutting into tanks requires local fire department approval.
- \* One complete copy of your approved plan must be at the construction site at all times; a copy of your approved plan must also be sent to the landowner.

### Item Specific Instructions

2. SITE ADDRESS  
Address at which closure is taking place.
5. EPA I.D. NO. under which the tanks will be manifested  
EPA I.D. numbers may be obtained from the State Department of Health Services, 916/324-1781.
6. CONTRACTOR  
Prime contractor for the project.
10. STATE REGISTERED HAZARDOUS WASTE TRANSPORTERS/FACILITIES
  - a) All residual liquids and sludges are to be removed from tanks before tanks are inerted.
  - c) Tanks must be hauled as hazardous waste.
  - d) This is the place where tanks will be taken for cleaning.
15. TANK HISTORY AND SAMPLING INFORMATION

Use History - This information is essential and must be accurate. Include tank installation date, products stored in the tank, and the date when the tank was last used.

Material to be sampled - e.g. water, oil, sludge, soil, etc.

Location and depth of samples - e.g. beneath the tank a maximum of two feet below the native soil/backfill interface, side wall at the high water mark, etc.

17. SITE HEALTH AND SAFETY PLAN

A site specific Health and Safety plan must be submitted. We advocate the site health and safety plan include the following items, at a minimum:

- a) The name and responsibilities of the site health and safety officer;
- b) Identification of health and safety hazards of each work task. Include potential fire, explosion, physical, and chemical hazards;
- c) An outline of briefings to be held before work each day to appraise employees of site health and safety hazards;
- d) Frequency and types of air and personnel monitoring to be used - along with the environmental sampling techniques and instrumentation. Include instrumentation maintenance and calibration methods and frequencies;
- e) Specific personal protective equipment and procedures to be used by workers to protect themselves from the identified hazards. Also state the contaminant concentrations in air - or other conditions - which will trigger changes in work or work habits to ensure workers are not exposed to high levels of hazardous chemicals or to other unsafe conditions;
- f) Confined space entry procedures (if applicable);
- g) Decontamination procedures;
- h) Measures to be taken to secure the site, excavation and stockpiled soil during and after work hours (e.g. barricades, caution tape, fencing, trench plates, security guards, etc.);
- i) Spill containment and emergency/contingency plan. Be sure to include emergency phone numbers, the location of the phone nearest the site, and directions to the hospital nearest the site;
- j) Documentation that all site workers have received the appropriate OSHA approved trainings and participate in appropriate medical surveillance per 29 CFR 1910.120; and
- k) Page for employees to sign indicating they have read and will comply with the site health and safety plan.

The safety plan must be distributed to all employees and contractors working in hazardous waste operations on site. A complete copy of the site health and safety plan along with any standard operating procedures shall be on site and accessible at all times.



NOTE: These requirements are excerpts from 29 CFR Part 1910.120, Hazardous Waste Operations and Emergency Response; Final Rule, March 6, 1989. Safety plans of certain underground tank sites may need to meet the complete requirements of this Rule.

19. PLOT PLAN

The plan should consist of a scaled view of the facility at which the tank(s) are located and should include the following information:

- a) Scale;
- b) North Arrow;
- c) Property Lines;
- d) Location of all Structures;
- e) Location of all relevant existing equipment including tanks and piping to be removed and dispensers;
- f) Streets;
- g) Underground conduits, sewers, water lines, utilities;
- h) Existing wells (drinking, monitoring, etc.);
- i) Depth to ground water; and
- j) All existing tanks and piping in addition to the ones being pulled.

20. DEPOSIT

A deposit, payable to Alameda County for the amount indicated on the Alameda County Underground Storage Tank Fee Schedule, must accompany the plans.

21. Blank Unauthorized Leak/Contamination Site Report forms may be obtained in limited quantities from our office and from the San Francisco Bay Regional Water Quality Control Board (415/464-1255). Larger quantities may be obtained directly from the State Water Resources Control Board at (916) 739-2421.

22. TANK CLOSURE REPORT

The tank closure report should contain the following information:

- a) General description of the closure activities;
- b) Description of tank, fittings and piping conditions. Indicate tank size and former contents; note any corrosion, pitting, holes, etc.;

- c) Description of the excavation itself. Include the tank and excavation depth, a log of the stratigraphic units encountered within the excavation, a description of root holes or other potential contaminant pathways, the depth to any observed ground water, descriptions and locations of stained or odor-bearing soil, and descriptions of any observed free product or sheen;
- d) Description of sampling methods;
- e) Description of any remedial measures conducted at the time of tank removal;
- f) To-scale figures showing the excavation size and depth, nearby buildings, sample locations and depths, and tank and piping locations. Include a copy of the plot plan prepared for the Tank Closure Plan under item 19;
- g) Chain of custody records;
- h) Copies of signed laboratory reports;
- i) Copies of "TSDF to Generator" Manifests for all hazardous wastes hauled offsite (sludge, rinsate, tanks and piping, contaminated soil, etc.); and
- j) Tabulation of the volume and final destination of all non-manifested contaminated soil hauled offsite.

**TABLE #2**  
**RECOMMENDED MINIMUM VERIFICATION ANALYSES FOR**  
**UNDERGROUND TANK LEAKS**

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

\* If found, analyze for dibenzofurans (PCBs) or dioxins (PCP)

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

## EXPLANATION FOR TABLE #2: MINIMUM VERIFICATION ANALYSIS

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

	<u>SOIL PPM</u>	<u>WATER PPB</u>
TPH G	1.0	50.0
TPH D	1.0	50.0
BTX&E	0.005	0.5
O & G	50.0	5,000.0

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

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

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

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

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

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

#### EPILOGUE

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

Regional Board Staff Recommendations  
Preliminary Site Investigation

10 August 1990

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



DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

July 30, 1991

Mr. Don Wixson  
American Brass and Iron Foundry  
7825 San Leandro St.  
Oakland CA 94621

- John Fehninger  
Env / Eng Specialist

Re: Inspection of American Brass and Iron Foundry,  
7825 San Leandro St., Oakland 94621

NOTICE OF VIOLATION

Dear Mr. Wixson:

As you are aware, Alameda County Environmental Health, Hazardous Materials Division specialists, Barney Chan and Scott Seery, performed an inspection of American Brass and Iron Foundry on April 10, 1991 to determine compliance with applicable hazardous materials laws and regulations. As a result of this inspection, a number of violations of the California Health and Safety Code, (CH&SC), Division 20 and Title 22, Division 4 of the California Code of Regulations (T22, CCR) were observed. These violations are listed below.

A hazardous materials management plan (HMMP) part II was given to you at the time of the inspection. During the inspection, it was pointed out to you that several products currently on your HMMP inventory may, in fact, not be hazardous. You were requested to review your material safety data sheets to make this determination. Section 25505(c) of the CH&SC states that the handler (of the chemicals) shall review the business plan at least once every two years to determine if a revision is necessary of the HMMP. Your initial HMMP was submitted in 1988. A receipt for the HMMP was given and signed requesting the submission of a modified HMMP within 60 days. To this date our office has not received the amended plan.

You were informed of the monitoring requirements for the permitting of the three operating underground tanks at this location. These tanks were issued temporary six month operating permits in 1988, which have long since expired. In order to permit these tanks for operation, you must perform proper monitoring according to an acceptable alternative described in Title 23, Subchapter 16 of the California Underground Storage Tank Regulations. You must provide our office with the pertinent documents which would include recent annual precision tank tests results (within the past year), daily inventory reconciliation sheets, quarterly monitoring reports and a monitoring and contingency plan. The operation of an underground tank without a permit is a violation of Title 23, Section 25299 and is subject to a civil penalty of not less that \$500 or more than \$5000 per day per tank per violation.

Rec'd  
8/11/91  
Hazard

Tanks  
are to be  
removed

Mr. Don Wixson  
American Brass and Iron Foundry  
July 30, 1991  
Page 2.

Our office is also aware of the removal of three underground tanks and the abandonment of another underground tank in 1987. In fact, you were sent a letter from our office signed by Mr. Rafat Shahid requesting information necessary to determine whether further investigation is required. This information at a minimum would include a sampling map location of all samples taken from the excavation pit, copies of the analytical results of these samples, copies of manifests of bills of lading for any material generated from the emptying and cleaning of these tanks and for the tanks and piping themselves, and for the contaminated stockpiles soils and the rationale for determining clean versus dirty excavated soils. Depending on the results of your submission either site closure or a need to perform additional work will be required. Additional information is requested concerning the abandoned 6000 gallon unleaded fuel tank. In-place abandonment of underground tanks in Alameda County is permitted under specific guidelines outlined in Title 23 of the California Underground Storage Tank Regulations and by County policy. You must provide all details of the abandonment of this underground tank for County comment. Please note that failure to provide the requested information may be considered improper closure of an underground tank which is a violation of Section 25298 of the CH&SC punishable by the same civil penalties as mentioned for Section 25299.

*Could be  
the 8k  
tank schedule  
for removal*

Evidence exists which shows the potential of foundry sands to contain elevated levels of heavy metals and polyaromatic hydrocarbons. According to Title 22, Division 4 CCR, Section 66305, it is the waste producers responsibility to determine if the waste is hazardous and to manage it as such if shown to be. This clearly means that the various piles of foundry sand materials need to be characterized chemically. Pursuant to Section 66694 of Title 22 CCR, the sampling and sample management must follow appropriate protocol consistent with SW846, EPA's test method manual for the sampling and analysis of solid waste. The representative samples generated from the appropriate sampling procedure described in SW846 should be analyzed for the California Assessment Manual (CAM) metals, total metals and soluble metals via the Waste Extraction Test (WET) if deemed necessary. You should also run these samples for the semi-volatiles via Method 8270. You were also requested to send any current laboratory analyses for the foundry wastes. Depending on these results you have several options. If the results indicate the materials are non-hazardous you can handle the materials as such and you have the option to seek the concurrence of the Department of Health Services (DOHS). If results indicate the material to be hazardous there is an additional need to ensure that the treatment levels for this material are not exceeded which would preclude land disposal.



Mr. Don Wixson  
American Brass and Iron Foundry  
July 30, 1991  
Page 3.

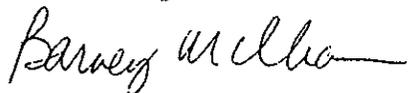
In any event, proper characterization of the foundry sand wastes must be performed to verify that disposal of a hazardous material to an unpermitted site has not occurred. This act is a violation of the CH&SC Section 25189.5 which is punishable by a fine of not less than \$5000 or more than \$100,000 per day of this violation.

The field inspection noticed considerable oil spillage around and under area where fresh oil and waste oil was being stored. These areas should be excavated to clean soil and secondarily contained to reduce spillage to the ground. Although clearly unintentional, this could be considered the illegal disposal of a hazardous material. In addition, it was noted that all drums were not properly labeled with waste name, waste type and start accumulation date.

In accordance with Section 66328 (d) of Title 22 CCR, you are requested to provide a plan of correction within thirty (30) days stating the actions American Brass and Iron Foundry will take to correct the violations noted and the expected date(s) of completion.

You may contact me at 271-4320 should you have any questions regarding this letter.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, District Attorney Office, Consumer and Environmental  
Protection Division  
L. Feldman, RWQCB  
H. Hatayama, DOHS  
E. Howell, Chief, Hazardous Materials Division

AmBrass1

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

July 30, 1991

Mr. Don Wixson  
American Brass and Iron Foundry  
7825 San Leandro St.  
Oakland CA 94621

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Mr. Don Wixson  
American Brass and Iron Foundry  
July 30, 1991  
Page 2.

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Mr. Don Wixson  
American Brass and Iron Foundry  
July 30, 1991  
Page 3.

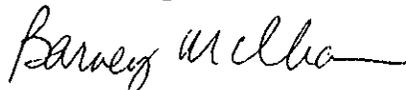
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Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, District Attorney Office, Consumer and Environmental  
Protection Division  
L. Feldman, RWQCB  
H. Hatayama, DOHS  
E. Howell, Chief, Hazardous Materials Division

AmBrass1

FROM FILE FOR ALVIN BOSCACCI  
2225 SAN LEONARD STREET  
OAKLAND, CA

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

#523

Certified Mailer # P 367 604 364

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415)

May 17, 1991

Mr. Dale Sobek  
6000 S Corporation  
42080 Osgood Road  
Fremont, CA 94539

NOTICE OF REQUEST FOR SAMPLING PROPOSAL

6000 S CORPORATION PROPERTY, 6000 STEVENSON BOULEVARD, FREMONT

Dear Mr. Sobek:

The Alameda County Department of Environmental Health, Hazardous Materials Division, has completed review of the reported facts associated with the placement of an estimated 2000-3500 cubic yards of foundry sands at the subject site. The review of the noted facts follows the January 31, 1991 correspondence from this Department that notified you of our role as lead agency in the foundry sand issue.

Following this discovery period, the Department has determined that additional sampling and tests of the subject foundry sand are necessary to adequately characterize the waste, and to determine appropriate standards for its treatment or disposal. The reasons supporting this determination are presented in greater detail in this letter. However, in summary, we are basing this requirement upon: 1) our review of reports cited in this letter that document limited sampling and analysis of foundry sand at the site; 2) our knowledge of operations and waste management practices at the source foundry; 3) the limitations of the source foundry's air pollution abatement equipment; and, 4) the potential for contaminants other than metals to be present in the waste foundry sand.

The discovery period entailed, in part: 1) review of the range of regulatory standards, law, and policy, and applicable exemptions to these standards, law, and policy, which govern the generation, treatment, and disposal of iron foundry waste streams, including waste foundry sands; 2) inspection of the source foundry, American Brass and Iron Foundry Company of Oakland; 3) review of the air emission permit standards and compliance history of the source foundry; 4) interviews with industry and regulatory professionals acquainted with the chemistry of iron foundry waste streams; 5) review of correspondence pertaining to the subject site from a variety of sources covering approximately the last three years; and, 6) review of sampling and contaminant analysis data presented in formal reports from consultants, as well as those data attached to correspondence submitted under 6000 S Corporation cover.

Mr. Dale Sobek  
RE: 6000 S Corp., 6000 Stevenson Blvd.  
May 17, 1991  
Page 2 of 6

Other contaminants, in addition to certain target metals, may be present in the foundry sands generated by the subject foundry. American Brass and Iron Foundry Company (ABI) uses a coke-fired cupola furnace in their smelting process. Emissions from the cupola furnace are routed through an afterburner, designed to combust and, hence, remove organics from the furnace exhaust, and then through a multi-chamber "baghouse" to collect remaining particulates. Afterburners are often inefficient at removing organic compounds, as proper afterburner temperatures are difficult to maintain without strict temperature monitoring; in addition, equipment breakdowns occur frequently.

Compliance records retained by the Bay Area Air Quality Management District (BAAQMD) present a history of such afterburner malfunctions, which resulted in residual organics inundating the baghouse. ABI has been cited repeatedly by the BAAQMD for air emission violations following such afterburner malfunctions. ABI has also been the subject of both administrative and civil actions as a result of these and other violations. The potential for residual organics to adsorb onto particulates collected in the baghouse because of afterburner inefficiency is high; during afterburner malfunctions, the potential is particularly high.

BAAQMD engineers identified another iron foundry in southern Alameda County which uses similar source iron, fuel (coke), smelting processes, and air pollution abatement technology to that of ABI. Air emission source tests performed at this foundry during October 1990, in response to requirements of AB 2588, the "Air Toxics Hot Spots Information and Assessment Act of 1987," identified 12 metals, hydrogen chloride, and organic compounds (specifically, polyaromatic hydrocarbons (PAH), dibenzodioxins, and dibenzofurans) being emitted. These tests were conducted by collecting exhaust gasses that had passed through the cupola afterburner and baghouse.

Among the many dibenzodioxins identified during these tests was 2,3,7,8-tetrachlorodibenzodioxin, or 2,3,7,8-TCDD, which is recognized as the most toxic of the 75 dioxins known to man. Oral-rat and -mouse LD<sub>50</sub> values published in Volume 2 of the 1981-82 Registry of Toxic Effects of Chemical Substances are as low as 22500 ng/kg and 114 ug/kg for this compound, respectively; oral-rat LD<sub>50</sub> values published in Volume III of Sax and Lewis' Dangerous Properties of Industrial Chemicals, 7th Edition, are as low as 20 ug/kg. Such compounds exhibit long residency times in soils and are bioaccumulative in animals. Many of the other organic compounds identified in this source test are toxic and known or suspected carcinogens, mutagens, and teratogens. An assessment of the risks for the surrounding community, associated with exposure to these emissions, is pending.

Mr. Dale Sobek  
RE: 6000 S Corp., 6000 Stevenson Blvd.  
May 17, 1991  
Page 3 of 6

ABI, in response to AB 2588, performed their own air emission test. We understand that this test, however, was conducted without concurrence from BAAQMD as to its scope, which was limited solely to analyzing for metals. We further understand that as a consequence of the outcome of tests performed at the foundry in southern Alameda County during 1990, BAAQMD will be requiring additional emissions tests for dibenzodioxins, -furans, and PAHs, among others, at ABI in the near future.

During a recent inspection of ABI, there was an enormous accumulation of foundry sands and slag at the site, with a wide variation of material color, consistency, and apparent composition. Information gathered during this inspection indicated that, up until just "recently," it was the policy of ABI to mix all solid waste streams together before transporting them off-site. Such solid wastes may include a range of foundry sand types (e.g., "green" sands with clay binders, core sands with resin binders, etc.), slag, and baghouse waste, among other potential solid wastes.

Several consultant reports and other data pertaining to the sampling and analysis of waste foundry sands at the subject site, as well as recommended options for the treatment or disposal of this waste, were reviewed, including, but not limited to, the following:

- o June 27, 1991 Levine-Fricke "Draft" report entitled, Sampling of Foundry Sands, 6000 Stevenson Boulevard, Fremont, California (this report also incorporates the sampling and analysis data from a cited January 1990 ENSCO report, and the July 9, 1986 Frederikson Engineering laboratory analysis report).
- o January 12, 1988 Earth Metrics Inc. report, as revised February 1, 1988, entitled, Site Contaminant Characterization History at the Fremont, California Site of 6000 S Corporation (this report incorporates the July 9, 1986 Frederikson Engineering laboratory analysis report, among others).

Pursuant to Section 66694, Article 11 of Title 22, California Code of Regulations (CCR), sampling and sample management must follow those procedures specified in Section One of "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods," SW-846, 2nd edition, U.S. Environmental Protection Agency, 1982. Consistent with SW-846, a waste sampling plan must be responsive to both regulatory and scientific objectives. If chemical information is to be considered reliable, it must be both accurate and sufficiently precise.

Mr. Dale Sobek  
RE: 6000 S Corp., 6000 Stevenson Blvd.  
May 17, 1991  
Page 4 of 6

To accomplish these objectives, such sampling strategies rely heavily upon the science of applied statistics. Sample accuracy is typically achieved by "random" sampling; whether such sampling is to be in the form of simple, stratified, or systematic random sampling depends upon the nature of the waste and how it was produced. Sampling precision is generally accomplished by collecting an appropriate number of samples, determined by employing Equation 8 of Table 1, SW-846. Further, samples must be "representative" of the sampled population, exhibiting average properties of the whole waste. None of the cited reports document how sampling and analysis protocol followed such SW-846 criteria.

You are directed to submit for review a proposal that clearly outlines plans to conduct further testing of the subject waste foundry sands. This proposal is to discuss sampling strategies and analyses in accord with Article 11, 22 CCR, "Criteria for Identification of Hazardous and Extremely Hazardous Wastes," which by reference incorporates the sampling and analyses protocol of EPA SW-846, and which is consistent with the type of waste at this site and the range of potential contaminants.

Sample analyses are to include the following target compounds, using test methods approved for use by the Department of Health Services Hazardous Waste Laboratory Certification Program:

o **Title 22 metals**

arsenic  
beryllium  
cadmium  
chromium, total  
chromium, hexavalent  
copper  
lead  
manganese  
mercury  
nickel  
selenium  
zinc

- o **polyaromatic hydrocarbons (PAH)**  
o **dibenzodioxins / dibenzofurans**



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RE: 6000 S Corp., 6000 Stevenson Blvd.  
May 17, 1991  
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Samples found to contain total concentrations of any organic or inorganic persistent or bioaccumulative target compounds that exceed published STLC values for those compounds by a factor of 10 or more will require additional waste extraction tests (WET).

Should elevated levels of any target compounds be identified following chemical analyses of the foundry sand, native soil in the area where this sand was historically stockpiled may require additional testing at the discretion of the oversight agencies. The potential for additional sampling of native soil is to be addressed by either: 1) incorporation of a native soil sampling plan in the current proposal; or, 2) by submittal of a supplemental native soil sampling plan should one become necessary following review of the foundry sand analysis results.

You are directed to submit the noted foundry sand sampling proposal within 45 days of the date of this letter, or by the close of business on July 1, 1991. A final report documenting the results of all activities associated with the foundry sand sampling and analysis, and any other tasks that may be required, is to be submitted within 45 days of the close of field sampling activities. This report should provide recommendations for any additional work at the site, and treatment or disposal options applicable to the waste foundry sand.

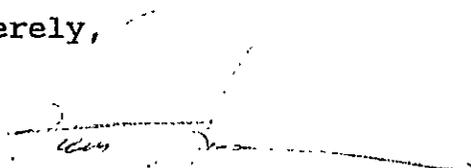
This Department continues to coordinate with the other oversight agencies involved with this case. Therefore, you are further directed to provide copies of this or any supplemental sampling proposal and subsequent reports to the Alameda County Water District (ACWD) and the City of Fremont Environmental Protection Division (EPD). Further, as has been stipulated previously by various authors, copies of all correspondence regarding the subject site are to be provided to the oversight agencies identified at the close of this letter.

Please be advised that until directed otherwise from this Department, you are prohibited from moving, treating, sampling, transporting, or otherwise handling the subject waste foundry sand. Any requests for such activity must be cleared in advance with this Department and the City of Fremont EPD.

Mr. Dale Sobek  
RE: 6000 S Corp., 6000 Stevenson Blvd.  
May 17, 1991  
Page 6 of 6

Please feel free to have your attorney call me at 415/271-4320 should there be any questions regarding the content of this letter.

Sincerely,

  
Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health  
Edgar Howell, Chief, Hazardous Materials Division  
Gil Jensen, Alameda County District Attorney's Office  
Howard Hatayama, DHS  
Lester Feldman, RWQCB  
Jill Duerig, ACWD  
Paulette Garcia, City of Fremont Attorney's Office  
Elizabeth Stowe, City of Fremont Environmental Protection  
Bob Eppstein, City of Fremont Building and Safety Department  
Ann Draper, City of Fremont Planning Department  
Janet Harbin, City of Fremont Planning Department  
Gary DiMercurio, City of Fremont Planning Commission  
Larry Luloff, Esq.  
files



Alameda County  
District Attorney's Office  
John J. Meehan, District Attorney

110.  
SPAIN  
F. 4.

April 22, 1991

Re: Environmental Investigations  
6000 S Corporation, 6000 Stevenson Blvd, Fremont, CA

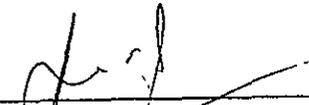
To Whom It May Concern:

This Office represents state and local agencies in the above investigation. We are informed that you are, or may potentially be an occupant of space on property located at, or contiguous with 6000 Stevenson Boulevard, Fremont, California. Water and environmental agencies are currently attempting the identification of potential environmental concerns. Please be informed that the site remains uncharacterized as to the nature and extent of contamination, if any. The information provided by the owner is currently inadequate to form definitive conclusions.

State law may give you the right to disclosure from the lessor as a lessee or potential lessee of the property. Should you wish to pursue this matter, you are advised that your rights to disclosure are independent of the actions of this Office.

Very truly yours,

JOHN J. MEEHAN  
District Attorney

By:   
\_\_\_\_\_  
Gilbert A. Jensen  
Senior Deputy District Attorney

JJM:GAJ:rf

white -env.health  
 yellow -facility  
 pink -files

# ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

## Hazardous Materials Division Inspection Form

Site ID# \_\_\_\_\_ Site Name American Brass + Iron Foundry Today's Date 4/10/91  
 Site Address 7825 San Leandro St EPA ID# \_\_\_\_\_  
 City Oak Zip 94621 Phone 632-3467

MAX Amt. Stored > 500lbs/55g/200cf?  Y  N  
 Hazardous Waste generated per month? \_\_\_\_\_

### Inspection Categories:

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

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

### I.A GENERATOR (Title 22)

	1. Waste ID	* 66471
	2. EPA ID	66472
	3. > 90 days	66508
	4. Label dates	66508
	5. Biennial	66493
Manifest	6. Records	66492
	7. Correct	66484
	8. Copy sent	66492
	9. Exception	66484
	10. Copies Rec'd	66492
Misc.	11. Treatment	66371
	12. On-site Disp. (H.S.&C.)	26189.5
	13. Ex Haz. Waste	66570
Prevention	14. Communications	67121
	15. Aisle Space	67124
	16. Local Authority	67126
	17. Maintenance	67120
Cont'n. Agency	18. Training	67105
	19. Prepared	67140
	20. Name List	67141
Containers, Tanks	21. Copies	67141
	22. Emg. Coord. Tmg.	67144
	23. Condition	67241
	24. Compatibility	67242
	25. Maintenance	67243
	26. Inspection	67244
	27. Buffer Zone	67246
	28. Tank Inspection	67259
	29. Containment	67245
	30. Safe Storage	67261
	31. Freeboard	67257
<b>I.B TRANSPORTER (Title 22)</b>		
	32. Applic./Insurance	66428
	33. Comp. Cert./CHP Insp.	66448
	34. Containers	66465
Manifest	35. Vehicles	66465
	36. EPA ID #s	66531
	37. Correct	66541
	38. HW Delivery	66543
	39. Records	66544
Cont'n's	40. Name/ Covers	66545
	41. Recyclables	66800

### Comments:

Operate 1 furnace (Cupola) for melting  
 scrap metal (~~cast~~) + iron  
 Cupola has layers of coke + iron  
 continuous melt process  
 Slag, silica are the by-product  
 waste materials.  
 Pipes are made w/ a permanent mold  
 also have sand molds - for pump  
 housing  
 Sands use bentonite, cores w/  
 resin coating for making "holes" through  
 casting.  
 special orders are "jobbers".  
 Hump was reviewed + potential  
 chemical compounds for review as non-hazardous  
 were noted.  
 New Hump Part 2 + receipt given  
 please return w/i 60 days

Contact: D. Wixson  
 Title: Plant Eng  
 Signature: X Donald Wixson

Inspector: B. Chan / S. Seery  
 Signature: \_\_\_\_\_

white -env.health  
 yellow -facility  
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

p2  
 80 Swan Way, #200  
 Oakland, CA 94621  
 (415) 271-4320

Hazardous Materials Division Inspection Form

Site ID# \_\_\_\_\_ Site Name Am Brass + Iron Today's Date 4/10/91  
 Site Address 7825 San Leandro St EPA ID# \_\_\_\_\_  
 City Oak Zip 94621 Phone 632-3467

MAX Amt. Stored > 500lbs/55g/200cf? (Y) N  
 Hazardous Waste generated per month? \_\_\_\_\_

- Inspection Categories:**  
 I. Haz. Mat/Waste GENERATOR/TRANSPORTER  
 II. Business Plans, Acute Hazardous Materials  
 III. Underground Tanks

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

<b>LA GENERATOR (Title 22)</b>	
___ 1. Waste ID	* 66471
___ 2. EPA ID	66472
___ 3. > 90 days	66508
___ 4. Label dates	66508
___ 5. Biennial	66493
<b>Manifest</b>	
___ 6. Records	66492
___ 7. Correct	66484
___ 8. Copy sent	66492
___ 9. Exception	66484
___ 10. Copies Rec'd	66492
<b>Misc.</b>	
___ 11. Treatment	66371
___ 12. On-site Disp. (H.S.&C.)	26189.5
___ 13. Ex Haz. Waste	66570
<b>Prevention</b>	
___ 14. Communications	67121
___ 15. Aisle Space	67124
___ 16. Local Authority	67126
___ 17. Maintenance	67120
___ 18. Training	67105
<b>Contn. Agency</b>	
___ 19. Prepared	67140
___ 20. Name List	67141
___ 21. Copies	67141
___ 22. Emg. Coord. Tmg.	67144
<b>Containers, Tanks</b>	
___ 23. Condition	67241
___ 24. Compatibility	67242
___ 25. Maintenance	67243
___ 26. Inspection	67244
___ 27. Buffer Zone	67246
___ 28. Tank Inspection	67259
___ 29. Containment	67245
___ 30. Safe Storage	67261
___ 31. Freeboard	67257
<b>I.B. TRANSPORTER (Title 22)</b>	
___ 32. Applic./Insurance	66428
___ 33. Comp. Cert./CHP Insp.	66448
___ 34. Containers	66465
<b>Manifest</b>	
___ 35. Vehicles	66465
___ 36. EPA ID #s	66531
___ 37. Correct	66541
___ 38. HW Delivery	66543
___ 39. Records	66544
<b>Cont'n</b>	
___ 40. Name/ Covers	66545
___ 41. Recyclables	66800

**Comments:**  
 Have "4" underground tanks currently -  
 2 gasoline, 1 diesel + 1-TCA.  
 3 UGTs were removed in ~1987  
 3-10,000 gallon fuel tanks  
 Please submit further information regarding  
 the UGT removals + address the 5 items  
 noted in the Oct. 30, 1987 letter addressed  
 to you by our agency.  
 The gasoline tank on San Leandro St is empty  
 + abandoned (near parking lot entrance) 1-6K  
 Off the 4 UGT's 1-10K diesel, 1-500  
 gasoline + 1-8000 TCA  
 Give Mr. Wixson form A + 4 form B's for  
 these tanks, please return w/ 30 days  
 these completed forms or a closure/modification  
 form for tank removal (new form given)  
 Give Mr. Wixson the new removal forms +  
 above ground storage tank regulations.  
 Tanks will likely be removed.  
 Airily monitoring report form also given

Rev 6/88  
 Contact: Donald Wixson  
 Title: Plant Eng Inspector: BChan / S. Seary  
 Signature: Donald Wixson Signature: \_\_\_\_\_

white -env.health  
 yellow -facility  
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

Hazardous Materials Division Inspection Form

13

Site ID# \_\_\_\_\_ Site Name Am Brass & Iron Foundry Today's Date 4/10/91  
 Site Address 7825 San Leandro St EPA ID# \_\_\_\_\_  
 City Oakland Zip 94621 Phone 632-3467

MAX Amt. Stored > 500lbs/55g/200cf?  Y  N  
 Hazardous Waste generated per month? \_\_\_\_\_

Inspection Categories:

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

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

IA GENERATOR (Title 22)

- |                   |                             |         |
|-------------------|-----------------------------|---------|
| Manifest          | 1. Waste ID                 | * 66471 |
|                   | 2. EPA ID                   | 66472   |
|                   | 3. > 90 days                | 66508   |
|                   | 4. Label dates              | 66508   |
|                   | 5. Biennial                 | 66493   |
|                   | 6. Records                  | 66492   |
|                   | 7. Correct                  | 66484   |
|                   | 8. Copy sent                | 66492   |
|                   | 9. Exception                | 66484   |
|                   | 10. Copies Rec'd            | 66492   |
| Misc.             | 11. Treatment               | 66371   |
|                   | 12. On-site Disp. (H.S.&C.) | 26189.5 |
|                   | 13. Ex Haz. Waste           | 66570   |
| Prevention        | 14. Communications          | 67121   |
|                   | 15. Aisle Space             | 67124   |
|                   | 16. Local Authority         | 67126   |
|                   | 17. Maintenance             | 67120   |
|                   | 18. Training                | 67105   |
| Confin. Agency    | 19. Prepared                | 67140   |
|                   | 20. Name List               | 67141   |
|                   | 21. Copies                  | 67141   |
|                   | 22. Emg. Coord. Tmg.        | 67144   |
| Containers, Tanks | 23. Condition               | 67241   |
|                   | 24. Compatibility           | 67242   |
|                   | 25. Maintenance             | 67243   |
|                   | 26. Inspection              | 67244   |
|                   | 27. Buffer Zone             | 67246   |
|                   | 28. Tank Inspection         | 67259   |
|                   | 29. Containment             | 67245   |
|                   | 30. Safe Storage            | 67261   |
|                   | 31. Freeboard               | 67257   |

Comments:

Cupola has a  
 After burner quench tower.  
 Baghouse waste is re-injected in cupola.  
 Heavy metals are of concern in this material.  
 There has been no definitive since whether this  
 is a legitimate process. This process has been  
 going on for the past year. Previously was  
 mixed w/ foundry sand + slag.  
 This is given to for road construction as landfill.  
 Please provide analytical data on this material  
 verifying non-hazardous.  
 Have a NPDES permit to discharge for  
 non-contact, other contact water is recycled.  
 Waste oil - from changing forklifts +  
 pay loaders also hydraulic fluids from  
 equipment.  
 Saw receipt for the disposal by  
 Evergreen ~~Co.~~ Environmental Services

IB TRANSPORTER (Title 22)

- |          |                           |       |
|----------|---------------------------|-------|
| Manifest | 32. Applic./Insurance     | 66428 |
|          | 33. Comp. Cert./CHP Insp. | 66448 |
|          | 34. Containers            | 66465 |
|          | 35. Vehicles              | 66465 |
|          | 36. EPA ID #s             | 66531 |
|          | 37. Correct               | 66541 |
|          | 38. HW Delivery           | 66543 |
|          | 39. Records               | 66544 |
| Contra   | 40. Name/ Covers          | 66545 |
|          | 41. Recyclables           | 66800 |

Contact: Donald Wixson  
 Title: Plant Eng.  
 Signature: [Signature]

Inspector: B. Chan / S. Seery  
 Signature: \_\_\_\_\_

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yellow -facility  
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

Hazardous Materials Division Inspection Form

Site ID# \_\_\_\_\_ Site Name An Brass + Lin Foundry Today's Date 7/10/91  
Site Address 520 Linden St EPA ID# \_\_\_\_\_  
City Oak Zip 94621 Phone 632-3467

MAX Amt. Stored > 500lbs/55g/200cf? (Y) N  
Hazardous Waste generated per month? \_\_\_\_\_

Inspection Categories:  
 I. Haz. Mat/Waste GENERATOR/TRANSPORTER  
 II. Business Plans, Acute Hazardous Materials  
 III. Underground Tanks

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

<b>LA GENERATOR (Title 22)</b>		
___	1. Waste ID	* 66471
___	2. EPA ID	66472
___	3. > 90 days	66508
___	4. Label dates	66508
___	5. Biennial	66493
<b>Manifest</b>		
___	6. Records	66492
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<b>Prevention</b>		
___	14. Communications	67121
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___	16. Local Authority	67126
___	17. Maintenance	67120
___	18. Training	67105
<b>Cont'n. Agency</b>		
___	19. Prepared	67140
___	20. Name List	67141
___	21. Copies	67141
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<b>Containers, Tanks</b>		
___	23. Condition	67241
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<b>I.B TRANSPORTER (Title 22)</b>		
___	32. Applic./Insurance	66428
___	33. Comp. Cert./CHP Insp.	66448
___	34. Containers	66465
<b>Manifest</b>		
___	35. Vehicles	66465
___	36. EPA ID #s	66531
___	37. Correct	66541
___	38. HW Delivery	66543
___	39. Records	66544
<b>Cont'n's</b>		
___	40. Name/ Covers	66545
___	41. Recyclables	66800

**Comments:**  
Field Inspection notes:  
 - Have approx 16-55 gal drums of isopropanol  
 - On the plant are (1) piles of coke  
 - (2) Piles of scrap metal (3) Piles of resin cores  
 - + pieces thereof (4) Piles of pig-iron (reaction)  
 - There is a liquid O<sub>2</sub> + liquid N<sub>2</sub> tank on west  
 - side of lot approx 5,000 gallon  
 - There are piles of varying size of foundry  
 - waste. The finer material is dedicated for  
 - construction fill  
 - Storage area for fresh oil product has  
 - large amount of spillage (55 gal drums)  
 - + 2-6000 gallon drums of hydraulic fluid  
 - 20-55 gal drums used for waste oil storage  
 - Outside maintenance shop are stored various  
 - cylinders of compressed gas, O<sub>2</sub>, etc  
 - of solvent parts cleaning tank here also  
 - Patterns are made here

Rev 6/88  
Contact: D. Wixson  
Title: Plant Eng  
Signature: [Signature]  
Inspector: B. Chen / S. Seery  
Signature: \_\_\_\_\_

white -env.health  
 yellow -facility  
 pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

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

Hazardous Materials Division Inspection Form

Site ID# \_\_\_\_\_ Site Name Am Brass + Gun Industry Today's Date 9/10/91  
 Site Address 7825 San Leandro St EPA ID# \_\_\_\_\_  
 City 94621 Zip 94 Phone 632-3467

MAX Amt. Stored > 500lbs/55g/200cf?  N  
 Hazardous Waste generated per month? \_\_\_\_\_

Inspection Categories:

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

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

I.A GENERATOR (Title 22)

Manifest	1. Waste ID	* 66471
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	3. > 90 days	66508
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	5. Biennial	66493
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	16. Local Authority	67126
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	26. Inspection	67244
	27. Buffer Zone	67246
	28. Tank Inspection	67259
	29. Containment	67245
	30. Safe Storage	67261
	31. Freeboard	67257

Comments:

Items to note or do:

- ① Complete + return modified Hump & Alter to our office w/ 60 days
- ② Complete either/or forms A + B to register tanks or the closure form & return to our agency w/ 30 days
- ③ Provide requested information to document the removal of the 3 UGT's (Oct 30, 1987 letter). Respond in writing to the issues in this letter.
- ④ For any tank to be continued to be operated provide the requirements for permitting re: annual pressure test, monitoring plan describe inventory, manipulation, provide qtrly monitoring report for last 2 qtrs + provide an emergency response plan
- ⑤ Provide a plan to determine if wastes (sand, slag, ore material etc) are hazardous <sup>potential</sup> special waste or non-hazardous. Provide copies of any current lab analyses for waste boundary tests.
- ⑥ Provide proper labeling of waste; secondary containment of fresh oils + waste oil containers s/b provided

These items will be requested formally in a "Notice of Violation" & a written response will be requested w/ 30 days precept of this letter.

I.B TRANSPORTER (Title 22)

Manifest	32. Applic./Insurance	66428
	33. Comp. Cert./CHP Insp.	66448
	34. Containers	66465
Manifest	35. Vehicles	66465
	36. EPA ID #s	66531
	37. Correct	66541
	38. HW Delivery	66543
	39. Records	66544
Cont'n	40. Name/ Covers	66545
	41. Recyclables	66800

Rev 6/88

Contact: D. Wilson  
 Title: Plant Eng  
 Signature: D. Wilson

Inspector: B Chen / S. Seery  
 Signature: \_\_\_\_\_



## Chan, Barney, Env. Health

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To: MOlvera@ABIfoundry.com  
Subject: Request for UST closure at ABI, 7825 San Leandro St., Oakland 94621

Dear Mr. Olvera:

In response to your inquiry and request for site closure regarding the former underground tanks at the referenced site, our office has reviewed the files for the site and have the following technical observations and requests:

### Technical Observations:

- Please provide a rose diagram for the site indicating the historic groundwater gradient and frequency of the direction. This information is necessary to determine if the release and plume is adequately delineated.
- I see your November 21, 2001 letter to me responded partially to my August 7, 1997 letter to Mr. Dave Robinson. In regards to the disposition and backfilling of the former UST tank pits, please provide a summary of the disposition of soil, water, sludge, rinseate etc generated from the tank removals. Document the amount, wt, volume and the type of disposal ie to landfill, to recycler, reused on site, treated onsite in gw treatment system etc and describe the amount and type of backfill material for each UST. I realize, some of this information is repetitive.
- The 550 gallon gasoline UST release has not been adequately defined. Please determine the lateral extent of soil and gw contamination. What was the original configuration of the UST? Can you account for the absence of piping and dispenser soil samples? The Levine Fricke closure report said the soils beneath the concrete wall and further west toward the former dispenser appeared to be affected by gasoline. Of the 120 cu yards of spoils generated during this tank's removal, 50 cy was aerated and presumed reused, was the other 70 cy also reused? MTBE, TAME, ETBE,DIPE, TBA,EDB and EDC must be analyzed in groundwater for this site in accordance with SWRQB requirements. I suggest TPHg and BTEX also be analyzed.
- The 8000 gallon gasoline UST, like above, must be analyzed for MTBE, the ether oxygenates and lead scavengers. Again TPHg and BTEX should also be run. Please confirm the composition of materials used in the tank backfill.
- The 8000 gallon TCE UST must also be analyzed for MTBE, the ether oxygenates and lead scavengers, given the presence of TPHg reported in initial soil and gw samples. Chlorinated solvents and semi-volatiles (EPA 8270) should also be run on the water sample. The appropriate location of MW2 should be evaluated using the gradient information determined in your rose diagram. Please confirm the disposition of excavated soils and identify the composition of the backfill soils.
- For the 12,000 gallon diesel underground tank, please document the disposition of excavated soils and composition of backfill material. Please comment on the location of MW1 relative the gw gradient. If there is no evidence that no fuel other than diesel was used in this tank, MTBE et al will not be required.

You may e mail, write or meet with me with your response to these items.

Sincerely,

Barney Chan  
ACEH-LOP 510-567-6765