

Preliminary Site Assessment

Phase I (Modified)

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FIRE PREVENTION

Prepared for:

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1.0 Executive Summary

On June 1, 2006 Remedy Environmental Services, LLC, Anaheim, California, was contracted by Scott Fooks, agent for Call Mac Transportation, that operates (operated) a truck repair/ auto wrecking yard at 461 McGraw Avenue, Livermore, CA, to assist the property owner in mapping the site to evaluate the extent of any hazardous waste, hazardous materials and visible soil contamination which may be present. The request was prompted by Call Mac's desire to remove approximately 200 vehicles from the site and to safely remove hazardous and non-hazardous waste as well as tanks so as to facilitate the sale of the property. Call Mac has provided Remedy with a copy of the Underground and Above Ground Storage Tank Removal and Sampling Report dated 17 October 1995 that had recommended removing the remaining portable tanks, to perform additional surface sampling of petroleum contamination and to remove of 39 55-gallon drums of unknown material that was being stored in a semi trailer.

As part of this preliminary site investigation (modified Phase I) Remedy mapped the location of all trucks, trailers, cars and tanks as well as visible petroleum contamination and the location of truck tires, batteries and all known hazardous waste and materials. Locations are marked on the sampling diagram found in the appendix.

A site audit by the Livermore Pleasanton Fire Department (LPFD) documented numerous areas of visible petroleum contamination with limited to extensive staining of the soil. Specifically, the soil beneath the asphalt truck is very dark and has extensive petroleum product on the ground. The truck, identified on the map as vehicle 2, has a two foot by three foot dark discoloration that appears to be from a fuel spill. Several vehicle fuel tanks had holes in them that may have contributed to the contamination visible underneath the vehicles.

There are numerous types of hazardous waste and hazardous materials found throughout the property, but none in such condition that there is an eminent health or safety risk. It is Remedy's opinion that it would be safe for all the scrap metal and vehicles that do not contain trash or hazardous materials/ waste be removed prior to the site mitigation. This provides better access to the yard, while making any potential contamination more visible.

Subsequent operations including hazardous materials/ waste removal, tank removal and soil mitigation that all require 40-hour OSHA trained personnel with approved health and safety/ work plans that have to be reviewed by the CUPA. Note that all fluids should be removed from vehicles prior to removal and that this procedure in itself must be carefully monitored and conducted by trained personnel in this specialty field.

George Caamano, REA 07864



2.0 Introduction

2.1 Purpose

The purpose of this document is solely to identify areas of potential environmental health and safety concerns and to recommend guidelines to remove the vehicles, scrap metal, drums, tanks, waste and petroleum contaminated soil from the site. This is not a site health and safety plan or work plan, but a modified Phase I Preliminary Site Assessment. Upon removal of the scrap metal, vehicles, trash and hazardous waste, sampling will need to be conducted to determine the extent of the onsite documented and suspected contamination. If retained, Remedy Environmental Services, LLC shall submit a sampling plan protocol and schedule to perform any remediation action that the Livermore Pleasanton Fire Department (LPFD), who is the local CUPA (Consolidated Uniform Permitted Agency), will require in order to mitigate the site.

Additionally, once the site has had hazardous and non-hazardous waste and scrap vehicles removed, Remedy is qualified to submit a tank closure plan and provide the services to remove the portable and above ground tanks. The LPFD is requiring that tank closures be conducted per California Code of Regulations (CCR) tank procedures and will need to be certified as clean by a registered geologist or marine chemist. If further investigation is needed, Remedy Environmental Services shall assure that future work be conducted in a manner to protect health, safety and the environment and will use established environmental protocol.

In summary, the purpose of this document is to obtain sufficient site information to safely remove vehicles, scrap metal, tires, batteries, trash and map the extent of visible soil contamination and hazardous waste present on site. The conclusions of this report are by no means a definitive or an absolute certainty due to the lack of sampling data and limited access to portions of the site not able to be surveyed due to equipment or debris blocking access.

2.2 Site Assessment Special Terms and Conditions

This document was designed to stand alone. Normally included in (Environmental Site Assessment) ESA's would be existing and available documents provided by the LPFD, the property owner, neighbors and provided by a database research. This review would meet the due diligence associated with the EPA and ASTM All Appropriate Inquires (AAI) standards. It is assumed that all of the work performed and reported by any previous environmental companies/ Agencies relative to Site assessment are accurate and true representation of the conditions of the Site. Aside from the 1995 tank removal report, other records were made available although none provided information herein that addressed the subsurface soil conditions and therefore, Remedy Environmental Services, LLC assumes that no previous subsurface investigations or corrective actions were conducted at the Site apart from the UST removal.

The Limited PSA scope was not designed to evaluate the subsurface soil or groundwater conditions from past operations. Historically, it is possible that various quantities of hazardous materials may have been stored, used or been windblown onto the property and only through sampling and an extensive interviewing process can this be determined. This report is limited to the area identified by the site map as the Call Mac facility in Livermore as it appears in appendices.

2.3 Site Assessment General Terms and Conditions

Remedy assumed that there are no hidden or latent environmental conditions or defects in or of the property, subsoil, structures, other than those noted herein. No responsibility for such conditions is assumed by Remedy. In addition, information estimates, and opinion furnished to or by Remedy and contained in this report were assumed to be provided from reliable sources believed to be true and correct. Therefore, Remedy assumes no further responsibility for the accuracy of this information since no independent investigation was conducted to substantiate this information. The Preliminary Site Assessment is an audit of the current conditions that existed on June 1st 2006. Although such an audit may sometimes be useful in connection with DTSC permitting, property transfers or other evaluation processes it may be possible that a bank or buyer of the property may require a more extensive review and need increased scrutiny of current and past records as well as a more expanded intrusive subsurface investigation.

2.4 Project Limitations

The conclusions and recommendations presented in this report are professional judgments and opinions based on information presented in this report as collected from the site survey. These opinions were arrived at in accordance with currently accepted geologic/ hydrologic and environmental standards and practices applicable to this location and are subject to the following limitations:

- 1) Remedy obtained the data and site information in this report primarily from visual inspections, surface observations and grab sampling, Client provided documents and interviews with individuals having information about the Site. The past operating conditions and manifestation of latent environmental conditions, or occurrence of future events may require further study and assessment, analysis of data, and reevaluation of the findings, observations, and conclusions in the report,
- 2) The data and information reported and the findings, observations, and conclusions expressed in this report are limited by the scope of work. The scope of work was provided by the Client and was agreed to by Remedy and the Client,
- 3) No warranty or guarantee, whether expressed or implied, is made with respect to the data reported herein that were based solely upon site conditions present at the time of the site assessment,
- 4) This report presents the professional opinions and findings of a scientific and technical nature. This report shall not be construed to offer legal opinions or representations as to the requirements of, nor compliance with, environment laws, rules, regulations or policies of federal, state or local government agencies. Use of this PSA report by Remedy limits Remedy's liability to only providing data necessary to identify any areas of potential contamination and necessary to meet industry standards such as the American Standards and Testing Methods (ASTM) requirements as published in their standards. Remedy's liability extends only to its Client and not to any other parties who may obtain the PSA report or portions of the report.

The conclusions and recommendations presented in this report are professional opinions based on data described in this report as pertaining to the specific site location and project referenced herein. This report is not a definitive study of contamination at the subject site and should not be interpreted as such.

3.0 Background

3.1 Site Description and Features

Call Mac Trucking has approximately 598' of frontage on McGraw Avenue and 197 feet of frontage towards the south end of the property on Preston Street. Located in Livermore, CA the property is in an industrial zone. It is secured with an 8' chain link fence which surrounds the estimated 2+ acre site. The only entrance is found on the Northwest end of the property which is adjacent to a retail boat sales yard (Olympic) and a structural rebar manufacturer that is directly across the street. Employee and guest parking of the Call Mac yard are not defined, but a land sea container located to the right of the entrance does contain documents and desks and appears to have been used as an office.

The property is all level useable land. It has worn asphalt in many of the traveled areas that has been overgrown by natural grasses and weeds but is mostly bare soil. There is one tree but no other natural features on the property. Near the center third of the property a mound approximately 4 feet high by 30 wide and 50 feet long is found. No explanation for this mound is given. Located around the south third middle is a small depression approximately 10 feet wide by 40 feet long and two feet deep. No explanation has been given for this feature. Most industrial activity appears to have been conducted near the former underground storage tank site at the north middle third of the property. Equipment and vehicles are stored evenly throughout the site.

Picture 1.

Depression may have been caused by movement of T-3, the 40 foot long truck body that now lies to the east. There are no signs of petroleum contamination or other visible indicators of potential hazards. The 1995 report tested the soil reportedly at this location and found levels to be below action criteria.



3.2 Physical Setting

Call Mac is located in Livermore which is in Alameda County, California. It is a multi use city with many residential homes and a moderate volume of industrial activity. Livermore, probably most famous for The Lawrence Livermore Labs, sits upon mostly alluvial sediment which traps rainwater to form large aquifers. Water tables are estimated to be 15-100 feet deep in this area of Livermore. Although this site was not tested, the porous soil found in the region usually makes for high levels of permeation.

Livermore, being approximately 24 miles from the San Francisco Bay, provides it with an ocean influenced climate when winds are favorable. At 479 feet above sea level this community

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receives an average of 14.79 inches of rain mostly falling from November through April. Temperature extremes over the last 30 years have ranged from 18-113 degrees Fahrenheit.



PICTURE 2. CROPPED FROM GOOGLE EARTH, ~ 2YRS. OLD.

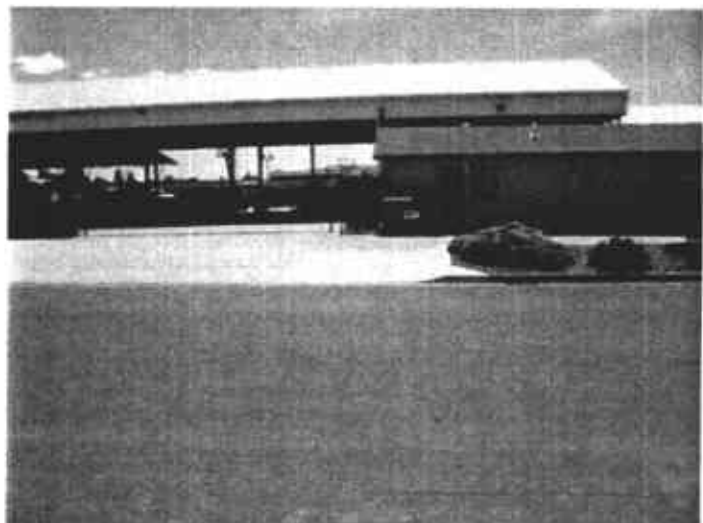
3.3 Site History and Land Use

No documented site history was provided as part of this report. With a complete site history search this modified Phase I report can be submitted as a complete Phase I study. Verbal reports indicate that the facility has been used by the current owner for more than 2 decades.

3.4 Adjacent Property Land Use

North of the site is Olympic Boat sales on south Front Road that retails new and used private boats such as Bayliner and other small fiberglass boats. East of the facility is an equipment rental company that rents to contractors and private parties. To the south is Preston Avenue which borders vacant land and to the West on McGraw is a structural steel rebar retailer. The site is approximately 343 feet from the nearest freeway (580). The nearest residential neighborhood is 595 feet to the north just north of California Highway 580.

Picture 3. Across the street on McGraw (west end) is a metal fabrication company that builds re-bar structures for use in concrete forming. There is minimal employee exposure. There are no signs of any contamination due to wind blown or runoff that could affect this site.



Picture 4. Entrance gate on right looking towards north with Olympic boat sales yard is located towards center right of trees. Interviews with Sales Manager and yard employees have indicated no odd odors or other noticeable work practices that have affected the boat yard. There are no signs of runoff or contamination along the north fence boundary.



Picture 5. View towards south on McGraw. There is approximately 800' of frontage separated by a 4 foot grass strip. There are no signs of contamination or runoff staining along fence line on grass or in street.



3.5 Summary of Previous Assessments

Remediation Risk Management, Inc., P.O. Box 1362, Aptos, CA 95001, performed an underground storage tank removal 25 July 1995 and Call Mac delivered their report to Remedy. The report was dated October 17 1995 and in summary concluded:

The tank had no visible holes, there were no signs of petroleum hydrocarbon contamination and testing indicated samples under the tank were non-detectable for TRPH. Some spillage occurred around the fill spout but that soil was reported to have been removed and manifested off site. There appears to be missing data to indicate that the soil under the fill spout area was tested to confirm that the removed soil was sufficient to reach the lateral and vertical extent of the contamination. The excavated soil pile showed motor oil concentrations of 0-100 ppm and

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was returned to the excavation. Water samples collected from under the tank had no detectable concentrations of fuels or oils.

Above ground tank labeled as T-2 on the RRM report and identified on the Remedy report as T-2 is the intact rusted above ground tank located on the southeast corner of the property. Soil contamination was found at levels for TRPH of 840 ppm. This tank is not the Underground Tank that was removed in 1995 and marked as UST-1. T-2 has been moved approximately 20 feet from where the soil contamination existed in order to sample and characterize the soil.

Tank T-3 is identified in the RRM report as having TRPH soil levels of 210 ppm beneath the tank. Using aerial photographs taken approximately 2 years ago (2004) and verifying with the RRM site map included in their report, it appears that T-3 has been moved. This tank, also identified by Remedy as T-3, is located next to T-2 and is lying diagonally in the rear southeast corner of the property. It has a substantial breach on top center and has what appears to be rainwater on sludge in the middle chamber. Samples of sludge were taken in 1995 and tested to be non-detectable for VOC's and PCB's. Without moving the tank there is no way of determining if additional soil contamination has occurred.

Oils and fuels were removed from T-2 and T-3 and manifested offsite by RRM on 7-25-95 using manifest number 9368837 (difficult to read).

Additional recommendations made by RRM in 1995 were to mitigate the small spills of petroleum contamination, to remove the above ground tanks and to identify and dispose of the 39 drums of unknown solids in one of the trailers. The report did not indicate that any other underground tank exists or that any other contaminants are present on site.

4 Scope of Modified Phase I Site Assessment

4.1 Scope of Assessment

The scope of this Phase I site Assessment was to assess if any contamination had existed or had been caused by operations at Call Mac Transportation that had not been previously mitigated and focused only on surface contamination that was readily visible with unaided eye. Three Remedy employees surveyed the property on June 1, 2006 and documented with digital photography and hand written notes potential problem areas and defined the scope of work as follows:

Remedy is to examine each vehicle, tractor trailer and automobile and determine if the removal of said vehicles and equipment would pose an environmental risk. Additionally, Remedy was to identify any fuel or oil spills that may have occurred during the auto wrecking operations. Specifically brought to our attention by the CUPA was a concern that during the removal of the fuel tanks from several of the semi tractor units that fuel may have been dumped on site. All potential signs of contamination were to be mapped so as to be mitigated upon the removal of the tractor units and other vehicles.

Remedy was contracted to map all known hazardous materials and wastes and identify them, if possible, on the site map. Included in this study was to clearly identify the remaining tanks (tanker trucks and metal tanks) and assess if they could be moved, put back in service or cleaned sufficiently to be deemed non-hazardous.

Recommendations were to be made so as to provide guidance to the CUPA and the property owner as to what procedures may be followed to best clear the property of the vehicles, scrap, etc and prepare it for sale.

4.2 Supplemental Record Review

This document is a modified Phase I report that was created only to document the hazards or potential hazards that existed onsite as of June 1, 2006. It was not within the scope of work to perform a background investigation, property owner review, review of historic property uses or to verify whether the site is listed in any State or Federal database as needing remedial action or having other environmental concerns.

Phase I reporting would include at a minimum Radius Diagrams indicating under ground storage tanks (UST) on site or in the surrounding area that could have led to groundwater contamination, Resource Conservation and Recovery Act (RCRA) generators or transporters that could have had significant spills in or surrounding the property, a National Environmental Priorities Act (NEPA) review to list all endangered species, historical homes, Indian reservations, FAA towers, antenna, etc. and listing of other reportable spills or self disclosures on Calsites and other database.

With the exception of the underground tank removal lab data and report, no records were made available that would assist in soil or underground characterization.

5.0 Preliminary Site Evaluation

5.1 Site Review

As part of the site survey conducted on June 1, 2006, Remedy personnel documented various hazardous materials, hazardous wastes and abandoned tanker trucks that may qualify as above ground tanks. All these items are of potential concern. Also noted during this survey was soil contamination that may test hazardous and most likely has to be removed from site.

Additionally, an audit was performed on the powered units and trailers to determine if they can be moved safely without harming the environment or personnel who will be removing the equipment. This portion of the Phase I report documents the specific areas of concern.

Picture 6. Thirty five drums that most likely contain spent caustic soda. This inorganic powder when used in solution can be used as a parts dipping compound. Remedy is testing for TTLC metals and VOC's that may have contaminated the now dried solution. It will be necessary to positively identify that this material is indeed caustic soda.



Picture 7. Miscellaneous metal 55-gallon drums are found in many areas throughout the yard. All seem to be free of hazardous materials as no liquid or solid residue could be seen. Many of the drums did contain trash and should be carefully emptied in case a hidden hazard may be present.



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Picture 8. Photo demonstrates typical section of yard with tractor trucks, trailers, cars, and empty containers found in various states of disrepair.



Picture 9. View of fueling station that had been the site of the UST1 removed in 1995. Island is still present in center left. No signs of discoloration due to oil, however the tree found in top center does produce a leaf that decomposes into dark compost and can be confused with oil staining. The soil here is dry and loosely compacted. Samples may need to be taken to confirm. Note: run TRPH and not TOC as organic matter will interfere with results.



Picture 10. Vehicle filled with tires, old water heater, car seats, etc. This water heater/ boiler (?) may contain asbestos and should probably be sampled prior to removal as scrap metal. Tires are regulated and need to be handled by a registered tire transporter, etc.



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Picture 11. Trash is found in many of the containers. Some with mixed waste types such as tires, small gas cans, aerosols cans, and universal waste/ e-waste.



Picture 12. Small gas cans are found in trailers and on soil. They all seem to be empty and there does not appear to be any indication of spills to ground.



Picture 13. There appears to be about 10 tanks with propane on site. Some tanks have been removed from trucks, but all appear to be empty. Scrap metal companies such as Adams Steel, Anaheim, CA have contracts with cylinder companies to safely and economically remove contents and handle propane cylinders as scrap metal. Since the propane is re-used as propane, this cylinder and its contents are exempt from solid waste laws and are not regulated.



5.2 Evaluation of Potential Contaminants

Per information gained from the underground tank removal document, property agent, site photography and interviews, this site has been used industrially as an auto wrecker and scrap metal firm for more than two decades. Typical to these types of operations auto wreckers generate motor vehicle wastes and ancillary hazardous and non-hazardous materials. With proper storage and transfer methods, these items usually pose little environmental risk. Without secondary containment many of these substances can cause significant harm to groundwater and personal safety.

5.3 Potential Sources of Hazardous materials/ Waste

The following items were found and mapped at the Call Mac Transportation site in Livermore:

1. (20) 55- gallon drums that appear to have petroleum products, including oils and grease
2. (2) 55- gallon drums of oil filters
3. (7) 55-gallon drums of ion-exchange resin
4. (2) 100 pound bags of soda ash
5. (35) 55-gallon drums of what appears to be spent soda ash used as a cleaning soap
6. Estimated 200 Truck tires that are in several trailers and outside piles
7. Estimated >75 Batteries that are in trailers or loose on ground
8. Estimated >800 gallons of fuel still in vehicle tanks
9. Estimated <250 gallons of rainwater/ asphalt sludge in horizontal tank T-3
10. Estimated 2 yards of soil contaminated with Asphalt emulsion under T-4
11. Estimated <20 yards of soil contaminated with petroleum hydrocarbons from leaking trucks and fueling/ emptying fuel tanks.
12. Several large and small propane cylinders.
13. Several computer monitors
14. Small quantity of aerosol cans

As part of a complete investigation, samples may be necessary to analyze soils. It is suggested that samples be tested for full volatile organic compounds (8260), Total Threshold Limiting Concentration metals (TTLC), total recoverable petroleum hydrocarbons (TRH) and possibly poly chlorinated bi-phenols (PCB) and or other pertinent tests as directed by the CUPA. Note that because the 1995 report did not provide complete data necessary to "close" the UST pull, it will be necessary to conduct additional testing for the underground storage tank portion of the site.

Note: Many of the vehicles and trailers have large amounts of trash that may have obscured the view of additional hazardous materials and or wastes. Until the first portion of the operation is complete as listed in section 7, Recommendations, it is unclear as to the extent of hazmat present.

6.0 Discussion of Preliminary Findings and Conclusions

A physical survey was conducted on June 1st, 2006 to gather information necessary to begin the site clean up at the McGraw address. The focus of the survey was to establish if any immediate hazards were present that could hinder the removal of the vehicles, trailers and trucks that have been stored onsite and need to be used to generate revenue to safely clean up the property.

6.1 Trucks

Although many trucks have had the fuel tanks removed or have plugs missing, there does appear to be significant fuel or oil spills underneath the vehicles. Many, if not all of the trucks, including ones with fuel tank holes have some trace residual fuel. Some trucks have full fuel tanks.

Picture 14. The tank holes appear to be due to missing tank connections that balance fuel levels between left and right tanks. Signs appear that spills are found under trucks with tank holes. These were obscured when trucks were in place, but now that they have been moved, it is apparent that many of the trucks have left spills.



6.2 Trailers

Some trailers have truck batteries, tires and small miscellaneous containers that may contain hazmat. These trailers also contain large volumes of trash, scrap metal and metal equipment such as pumps, engine cranes, etc.

6.3 Tanks

All tanks with one exception appear to be empty. T-3 has some rainwater and asphalt sludge in the center portion. Remedy personnel attempted to view inside the other tanks that were accessible. No residue or odor was noted. T-4, the asphalt truck and T-2 the metal tank were not able to be accessed. Tapping on sides produced a hollow sound indicating that a majority, if not all, of the tanks were empty or partially empty. Residues may remain that force these tanks to be treated under CCR tank rules.

The LPPD has made clear that these tanks are to be managed according to CCR tank regulations. Since all but one of the tanks were portable (on wheels or were on wheels) it was possible that these would not be covered under this statute, but due to the history of the site, the likely contents and the lack of recordkeeping or standard hygiene practices, these will be considered

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in the same category as underground or above ground tanks. Triple rinsing is necessary with all residues removed and water contained and tested prior to removal. After the decontamination and waste have been removed, a marine chemist will need to certify the tanks are safe to move and will issue a closer report on the tanks.

One tank, T-2 appears to be of size and shape as to once have been an underground tank, but this tank was drained and tested in 1995 and lab data indicates it was free of residue and was non-hazardous. If it had been an UST, it would have been included in the closer process by the Alameda County Environmental Health Department who supervised the UST pull in 1995. There does not appear to have been any liquid placed in the tank since the report was filed and simple direct reading instruments will detect a hazardous atmosphere if present. If upon conducting an assessment the tank is sampled and a hazardous residue is present, then this tank will have to be handled according to local ordinances. Of other concerns may be the de-gassing that would be required if a hazardous atmosphere were present. These questions will need to be addressed as part of a more detailed report and in conjunction with the policies of the LPDF standards for tank management.

Picture 11. Fuel Tanker did not appear to have any free liquids inside. Inside tank walls were rusted and had dust coating. This tank and others may need hot pressure washing to remove residues if present. Water will need to be captured and tested prior to reclamation or disposal.



Picture 12. Tank T-3 was said to have been emptied as listed on the 1995 underground storage tank report. It is believed to have been moved since 2004 since its location does not match the aerial photo found on Google Earth.

Although difficult to see on copy, Picture 2 has tank on right center running parallel to property south side. Google photo is presumed to have been taken in circa 2004.



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Picture 13. Contents of T-3. Open hole on top has presumably let rainwater mix with contents. Material has consistency of thick asphalt that separates when asphalt is pushed aside. Estimates of volume are 100 gallons of liquid with 300 gallons of solids. Decontamination of this tank would be very difficult and would most likely require permit confined space entry.



Picture 14. This photo depicts water rising as solids are pushed aside. Solids are very hard and will not be easily removed. Sample was taken from lower right. Note the twigs and leaves that have fallen into the tank.

There are no signs of a bottom breach. No visible soil staining around perimeter of tank.



Picture 15. This asphalt tanker labeled as T-4 appears to be empty. There are obvious signs that the underlying soil has been contaminated by the asphalt (?).

Remedy sampled this site next to bucket. Soil is very discolored and dry. Ground has appearance of dried crushed asphalt.

This tank, unless it can be reused as an asphalt truck, will likely be classified as a portable tank but will still need decon if sampling indicates hazardous properties.



6.4 Scrap Metal/ Cars

Although there are no visible signs of spills relating to the scrap metal or automobiles/ scrap trucks that are left onsite, it can be assumed that most of the vehicles have residual gasoline and other automotive fluids that may be released while loading or in transport. Vehicles may be removed as scrap, but if possible, draining of fluids should be done on site by qualified personnel to avoid any potential highway spills. Many scrap metal firms have mobile car crushers and experienced teams that are skilled at this process.



Picture 16. Drums with scrap metal and miscellaneous scrap items



Picture 17. Miscellaneous scrap



Picture 18. Small empty scrap tank, tires, etc.

6.6 Land Sea Container/ Trailer with drums

The LSC and the Trailer containing oil drums and caustic soda (presumed) could pose a risk to health or environmental if material is moved improperly. Possibility of flammable vapors igniting during fluid transfers or releases of caustic dusts while removing the drums needs to be considered. Sampling should be conducted to determine if fuels/ oils have chlorinated contamination and that the soda ash drums are indeed identified.

Picture 19. This is a photo of the 40-foot land sea container that was used for dispensing and storage of motor oil, fuels, soaps, filters and other automotive fluids. No spills to floor or surrounding soil outside of container. Drums vary as to levels of fluids.



Picture 20. If material tests to be caustic soda, then a simple transfer into a covered roll off bin will suffice for removing from site. Any spills can be swept and easily disposed of at Kettleman Hills or other permitted site.

This operation must be done under supervision and conducted by OSHA trained personnel



6.6 Hazardous Materials/ Hazardous Wastes

Found throughout the site are various types of universal wastes, e-wastes, hazardous materials and hazardous wastes. Common to this type of operation are tires, propane cylinders, fuels, oils, soaps, and paints (note no paint was found).

Picture 21. Numerous truck batteries are found in trailers and on ground throughout yard. These items can be handled on a bill of lading for reclamation if properly packaged and documented. There does not appear to be any cracked or leaking batteries anywhere on-site.



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Picture 22. There are an estimated 400 truck tires found in various areas on site. These must be removed by a licensed transporter and taken to an authorized tire recycler. Tires with rims are especially difficult to dispose of.



Picture 23. Various fuel tanks and small tanks, drums and bulk containers found onsite that may contain fuel residues and therefore pose a hazard if not dealt with properly. These must be handled carefully so as not to cause static charge and ignite vapors if present. Portable LEL meters must be used prior to movement to avoid flash issues. Fuel must be drained from all vehicles and tanks prior to movement. Grounding is required.



7.0 Recommendations

After reviewing the information as presented, it appears that the mitigation and site clean up can be performed in four distinct operations.

7.1 Removal of Vehicles and Scrap

There does not appear to be any significant environmental harm or health or safety risk associated with this operation. Because the integrity of the vehicles can not be assured, it is *recommended* that:

1. All fuels and engine fluids be completely removed from the vehicles prior to loading, crushing or being removed from site. Vehicles still contain engine oils, some residual fuels, antifreeze and other fluids. No vehicle on site appears to have airbags. With the safe removal of fluids, vehicles should be moved to allow room for other waste mitigation operations.
2. Trained personnel will stage an area whereby secondary containment can be placed and used to store fuels and other automotive liquids removed from vehicles. Using portable equipment all fuel tanks will be drained dry and engine sumps will have oils removed. Antifreeze will be drained from radiators and collected in bulk totes.
3. Fluids will be properly categorized and an assessment made as to their regulatory status; clean useable product can be sold, retrograde products can be disposed of at no charge or for a minimal fee and waste will be manifested to facilities that are permitted.
4. Permits will need to be issued for the demolition of these items. The hot work involving torch cutting, etc will pose an immediate fire hazard and is dangerous work. Proper documentation will need to be provided indicating insurance and experience in this field in order to proceed.
5. As vehicles are removed it is highly recommended that flags be placed at each vehicle spot to easily document where the vehicle was. This will assist in the soil mitigation when that phase of the project is reached.

All operations should be supervised by a team prepared to clean up any incidental spills and be trained to properly store, collect and label hazardous materials and wastes. This supervisory team should mark all locations with flags that indicate potential soil contamination as vehicles are removed.

This portion of the job must be completed first so as to create working space for the later phases and to expose any potential areas of contamination that are currently hidden.

Note: No vehicles or trailers can be moved if they contain hazardous waste or hazardous materials.

7.2 Removal of Hazardous Materials/ Wastes

Although there appears to be less hazardous materials present than first was believed, there are still significant quantities of material. Once the site is cleared of easily accessible scrap metal, vehicles and trailers that are free of hazardous materials and waste, a suitable work area can be defined and zones established for completing the hazardous materials/ waste portion of the operation. It is important that an OSHA trained 40 hour (1910.120) team perform this work while operating under a site health and safety plan outline. The nature of the scope is as follows:

1. Collect all hazardous materials and organize by hazard class
2. Package materials in UN approved containers and prepare for transport
3. Label materials per DOT and EPA standards
4. Profile materials to permitted TSDF and/ or recycling facilities
5. Manifest materials and arrange for shipping and paperwork to be routed according to State law, whether it be as a hazardous waste or non-hazardous waste, all materials need documentation as to final disposition.

Once this portion of the operation is complete, the remaining trailers and trucks can be removed and cleared.

7.21 Documentation

Historically this site has been evaluated and under some form of County or City jurisdiction for more than 10 years. Reports provided indicate that large volumes of hazardous materials have existed and were listed on various inspection reports. Documentation must be presented to the LPFD that certifies that these items were managed according to State and Federal regulations and that they were safely and appropriately disposed of. Acceptable documents may include:

1. Uniform Hazardous Waste Manifests.
2. Bills of Lading
3. Sworn Statements from owners or employees as to disposition
4. Receipts from Household Hazardous Waste collection centers.
5. Accounting records indicating payment for disposal, etc.

7.3 Tank Removal

The tanks are required to be "closed" per Underground Storage Tank guidelines as written in California Health and Safety Code. A tank closure plan must be written and approved by the CUPA prior to commencing this phase of the site mitigation. Above ground tanks are regulated by the DTSC and must be handled in very specific manner.

Triple rinsing of tank will create large volumes of wastewater. The water will need to be collected on site in portable tanks, analyzed for hazardous characteristics and recycled or disposed of accordingly.

This operation must be conducted by licensed contractors with permits to perform such work. All work must be signed off by a marine chemist or professional engineer that the tanks are

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certified clean. Note: This process is highly regulated and tank closure reports must be approved by the CUPA.

7.4 Site Mitigation

After all surface debris, scrap, trailers, trash, hazmat, etc has been removed and the tanks are moved off-site and closure complete, another site assessment is needed as part of a complete sampling plan to determine the extent of contamination. A full site sampling plan must be submitted to properly characterize the facility. Action levels will be established by the local CUPA and site maps drawn and samples taken to determine scope of this phase of the project.

Skip loaders and back hoes will most likely be used to excavate located "hotspots" and soils will be placed in surface impoundments. Soils will be tested and characterized to determine regulatory status. Currently it is estimated that 100- 200 yards of soil may have to be removed, however, there will most likely be new hotspots under some of the vehicles once they are removed and a more clear investigation can be conducted. Although present, it can be assumed that the soil will test non-hazardous for fuels and petroleum contamination. There have been no indications of battery breakage to cause lead or heavy metal issues or gasoline spills to create BTEX problems.

7.5 Water Well

A water well exists on the property towards the northeast corner. This well has not been tested (no documents provided) for contaminants. It is the fear of some that an open well top can provide immediate access to the ground water table and if contaminants were purposely or accidentally introduced through this well that immediate and long term environmental would occur. In order to prevent any incident from occurring, it is highly recommended that the well casing be sealed and bollards be placed around the well to protect it from damage.

Sampling of this water is recommended to exclude or confirm immediate ground water contamination.

8.0 Summary

The Call Mac site in Livermore, Ca has been used for many years as a truck repair/ wrecking yard and scrap metal facility. During this course of time many, if not hundreds, of vehicles have accumulated that now must be removed from site. As with many repair/ wrecking operations, some hazardous materials and hazardous wastes are used or generated in routine operations without posing significant threat to employee health or safety, however, if these materials are improperly discarded or spilled an environmental risk may be present. At the Call Mac yard these items still remain and if not removed carefully could increase the chance for personal injury or environmental damage.

The reality is that most of the waste items and hazardous materials are in themselves low risk. Untrained personnel in this industry have been working with these chemicals for many years and with minimal training, risk of exposure or personnel harm is low. It is our opinion that the scrap metal and vehicles should be moved from the property with safeguards to assure that no fluids is spilled and that the vehicles and scrap can be safely handled and transported. Once this portion of the clean up is satisfied, then the remaining items will be marked, collected and handled per State and Federal waste laws under close supervision of the local CUPA.

Logistically, because of the large volume and size of the vehicles the recycling company will need almost a month to remove the low risk units. Hazardous materials may be moved in three to four days while the tank clean up may vary from three to four days to well over a week if they are regulated as hazardous AST's. Based on the findings of the site sampling, site mitigation may vary greatly and it is difficult to quantify volumes or estimate clean up costs accurately.

If this property is to be sold for commercial or residential use, it would be wise to properly assay the entire property by conducting a complete Phase II assessment prior to sale. Without extensive invasive (sampling) and non-invasive (ground penetrating radar) methods to analyze the property thoroughly it can not be "certified" as clean, however, there is no reason to believe that after the aforementioned operations are complete that any contamination or hazards would still be present that would hinder the property sale.

9.0 Qualification of Environmental Assessor

Jorge (George) Caamano is a Registered Environmental Assessor with the State of California Department of Toxic Substances Control. Mr. Caamano has 25 years experience in the field of emergency response, remediation and site clean up, site assessment, waste minimization, OSHA compliance training and has other fields of expertise. He is a veteran of the United States Coast Guard and was a team member on numerous field response and forensic cases involving oil spills, environmental releases by refineries and industrial sources. Mr. Caamano has been involved in site assessment and clean up for various industrial sites including plating shops, auto wreckers, scrap metal facilities and others.

Mr. Caamano has a degree in Geology and is the current President of the California Waste Association, the oldest environment association in California. Mr. Caamano is also the Technical Director for a wastewater treatment company that specializes in reclaiming industrial wastes. George also lectures across the United States in the area of recyclable materials and is noted as an expert in this field. Mr. Caamano is a member in good standing of the Certified Hazardous Materials Manager (CHMM) Association and is also a member of California Water Environmental Association (CWEA).

As part of the preparation of this report Mr. Caamano conducted performed the management interviews, employee interviews, site audit and a portion of the records research and review as well as created this written report.

Respectfully,



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