ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

October 27, 1997
StID #1453

To: Mr. Steve Morse, SFRWQCB
From: Barney Chan, ACEH

Re: Site Closure at Kmart, Former American National Can at 3801 E. 8th St., Oakland 94601

Dear Mr. Morse:

This letter responds to the Rust Environment & Infrastructure Inc., (RUST), October 23, 1997 request for closure of "Area 3" at the above site. As you are aware, your office and DTSC have already issued closure letters on the other areas at the site related to underground tanks and a permitted TSDF and the only area of concern is Area 3. As part of the Sitewide Risk Management Plan (SRMP) groundwater monitoring was to continue in Area 3 to measure the effectiveness of site remediation at the adjoining former Ekotek site. Although the anticipated change in groundwater flow has not occurred after Ekotek's site remediation, no significant change in groundwater concentration or free product thickness has been observed in monitoring wells in Area 3 over the past 1 1/2 year.

Although, no mention of specific groundwater monitoring requirements was stated in the SRMP, I have no objection for area 3 closure and monitoring well closure. This is based on the following:

* Previously reviewed SOMA Human Health Risk Assessment approved by the RWQCB.

* Long term monitoring has shown stable conditions with no anticipated changes until further remediation occurs at the former Ekotek site.

* Kmart, American National Can and Ekotek/Webster's agreement for future site liability

* existing deed restriction prohibiting use of groundwater for drinking

I have included for your review a copy of the the SRMP for Area 3 and the latest monitoring results for Area. The site should be included in the City's permit tracking system and a copy of the closure letter sent to Mr. Leroy Griffin of Oakland Haz Mat.

Please contact me at (510) 567-6765 if you have any questions.
Area3cl

BC-files

#1453

RUST Rust Environment & Infrastructure Inc.

A Rust International Company
12 Metro Park Road
Albany, NY 12205

Phone 518 458.1313
Fax 518.458 2472

October 23, 1997

Stephen I. Morse
Supervising Water Resources Control Engineer
San Francisco Bay Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, CA 94612

Barney M. Chan
Hazardous Materials Specialist
Department of Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, California 94502

97 OCT 24 AM 9:14

RE: American National Can Company
Former Oakland, California Facility

Dear Sirs:

American National Can Company (ANC) has completed a site-wide environmental restoration of their former can manufacturing facility located at 3801 East 8th Street, Oakland California. The subject site is now a retail shopping center operated by Kmart. Over the past seven years, ANC completed the investigation of soil and groundwater contamination in an area of the site designated "Area 3." As part of a Sitewide Risk Management Plan (SRMP), developed with your Agencies, groundwater monitoring has been conducted in Area 3 for the past 2 years. The requirements of the SRMP for Area 3 have been completed. Consistent with the SRMP, please approve closure of Area 3 by way of a letter stating that no further investigation, remediation or groundwater monitoring is required. Enclosed is a completed Site Closure Summary form for Area 3. Following is a summary of investigation, remedial, and monitoring activities that have been performed in Area 3. This information summarizes the basis by which closure of this area is now deemed appropriate.

Area 3 is located in the southeastern corner of the site, adjacent to the Ekotek Lube property. Soil and groundwater samples collected during site investigations were found to be contaminated by various volatile and semi-volatile organic compounds and polychlorinated biphenyls (PCBs). Some of the monitoring wells contained floating product. In general, the concentration of contaminants in soil and groundwater increased toward the Ekotek Lube property boundary. Groundwater elevation monitoring during the investigations demonstrated that an abnormality in the regional groundwater gradient (groundwater mound) exists beneath the Ekotek Lube property which causes groundwater

to flow into Area 3 from the southeast. The results of these investigations demonstrated that the contamination in Area 3 originated at an off-site source, southeast of the former ANC property.

Regional groundwater flowing towards the southeast has limited the extent to which impacted groundwater has migrated onto the former ANC property from Ekotek Lube. The western limit of Area 3 contamination is located on Kmart's property, beneath where ANC's Building #12 was formerly located. The regional groundwater flow also redirects the impacted groundwater in Area 3 back to the suspected source property.

ANC retained Soma Environmental Engineering, Inc. to prepare a baseline Human Health Risk Assessment (HRA) for Area 3 of the site. The HRA, dated December 7, 1993, concluded the potential for public health risks existed if groundwater was used for consumptive purposes. However, no other potential health risks to the general public, including Kmart customers, employees or construction workers were identified. ANC filed a deed restriction to prevent the usage of groundwater from the entire subject property, including Area 3. As a result, there are no exposure pathways or receptors for the contamination in Area 3. A copy of the deed restriction is attached to the enclosed Site Closure Summary form.

Remedial activities in Area 3 have included periodic floating product removal from the ANC monitoring wells during quarterly monitoring events. At the adjacent Ekotek Lube site, the owners initially evacuated and sealed underground sumps. More recently, the owners removed all of the subsurface structures at the Ekotek Lube site and paved much of the surface of that site to decrease infiltration.

A groundwater monitoring program performed in Area 3 as part of the SRMP included quarterly sampling and analysis and monthly water level and product thickness monitoring. The intent of the program was to provide data regarding groundwater conditions (i.e.; groundwater quality, groundwater mound height and product thickness) to the RWQCB and ACDEH so that the effectiveness of remedial measures taken on the Ekotek Lube property could be assessed. The past 1½ years of groundwater monitoring revealed no significant changes in the groundwater mound beneath the Ekotek Lube property. Because of these results, the effectiveness of the remedial measures taken on the Ekotek Lube property could not be conclusively demonstrated through the SRMP.

There is no longer a need to gather additional subsurface information on the former ANC property for several reasons. First and foremost Kmart and ANC, on the one hand, and Ekotek and the Websters, on the other, have reached an agreement allocating responsibility among themselves for the affected soil and groundwater in Area 3 and the adjacent Ekotek Lube site. Under that agreement, ANC will be responsible for affected soil and groundwater in Area 3, while Ekotek and the Websters

will be responsible for affected soil and groundwater on the Ekotek Lube site, including any actions required by the Regional Board to prevent contamination at the Ekotek Lube.

Second, the extent of impact on the Kmart property has been fully determined and the monitoring has demonstrated that remaining risks are acceptable in the affected area. Moreover, given the deed restriction on groundwater usage, there are no exposure pathways or receptors for the Area 3 contamination. Based on this, further investigation, remediation, or monitoring in Area 3 is not necessary.

Upon receipt of a "no further action" letter from your agency, ANC intends to close all monitoring wells in Area 3 in compliance with the requirements of the Alameda County Flood Control and Water Conservation District - Zone 7. Those wells will be closed within 30 days after receipt of the no further action letter and a report documenting the well closure activities will be submitted to your attention.

Please contact me at (518) 437-8373 if you have any questions or require additional information. Thank you for your cooperation in this matter.

Sincerely,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

Enclosures

cc: R. Rivetna
P. Cafferty, Esq.
R. Williams
D. Bruegel, Esq.
R. Creps

SITE CLOSURE SUMMARY

I. AGENCY INFORMATION

Date:

Agency Name: S.F.B.R.W.Q.C.B.	Address: 2101 Webster Street
City/State/Zip: Oakland, CA 94612	Phone: (510) 286-1255
Responsible Staff Person: Sum Arigala	Title: Water Resources Control Engineer

II. SITE INFORMATION

Site Facility Name: KMART (formerly American National Can Company) AREA 3		
Site Facility Address: 3801 East 8th Street, Oakland, CA 94601		
RB LUSTIS Case No.:	Local or LOP Case No.:	Priority:
URF Filing Date:	SWEEPS No.:	

Responsible Parties (include addresses and phone numbers)
Contaminant migration onto property from off-site source.

Tank No.	Size in Gallons	Contents	Closed In Place/Removed?	Date

III. RELEASE AND SITE CHARACTERIZATION INFORMATION

Cause and Type of Release: Contaminant migration onto property from off-site source.		
Site characterization complete? (Yes) ~~No~~	Date Approved By Oversight Agency:	
Monitoring wells installed? (Yes) ~~No~~	Number: 12	Proper screened interval? (Yes) ~~No~~
Highest GW Depth Below Ground Surface: 14.29'	Lowest Depth: 7.47'	Flow Direction: W/NW
Most Sensitive Current Use: Parking Lot		
Most Sensitive Potential Use and Probability of Use: Parking Lot - 100%		
Are drinking water wells affected? ~~Yes~~ (No)	Aquifer Name: None	
Is surface water affected? ~~Yes~~ (No)	Nearest/Affected SW Name: None	
Off-Site Beneficial Use Impacts (Addresses/Locations): None		
Report(s) on file? (Yes) ~~No~~	Where is report(s) filed? SFBRWQCB/ ACDEH	

AREA 3

TREATMENT AND DISPOSAL OF AFFECTED MATERIAL			
Material	**Amount (Include Units)**	**Action (Treatment or Disposal w/Destination)**	**Date**
Tank			
Piping			
Free Product	500 gals. (est.)	Disposal/Rollins Chempack	1991-1996
Soil			
Groundwater			
Barrels			

MAXIMUM DOCUMENTED POLLUTANT CONCENTRATIONS BEFORE AND AFTER CLEANUP

POLLUTANT	Soil (ppm)		Water (ppm)		POLLUTANT	Soil (ppm)		Water (ppm)	
	Before	After	Before	After		Before	After	Before	After
TPH (Gas)			3.5		Xylene	< 2.5		1.3	
TPH (Diesel)	5900		15		Ethylbenzene	< 2.5		0.17	
Benzene	< 2.5		0.54		Oil & Grease				
Toluene	< 2.5		0.95		Heavy Metals Pb	32.1		0.012	
Other PCBs	2.8		0.033		Other				

Comments (Depth of Remediation, etc.):

Remedial Actions taken included monthly removal of product from monitoring wells.

IV. CLOSURE

Does completed corrective action protect existing beneficial uses per the Regional Board Basin Plan? (Yes) No		
Does completed corrective action protect potential beneficial uses per the Regional Board Basin Plan? (Yes) No		
Does corrective action protect public health for current land use? (Yes) No		
Site Management Requirements: Do not create vertical conduits, deed restriction on groundwater usage, health and safety plans to be followed during any activities leading to soil and/or groundwater pollution exposure.		
Monitoring Wells Decommissioned: * (Yes) No	Number Decommissioned: 12	Number Retained: 0
List Enforcement Actions Taken: None		
List Enforcement Actions Rescinded: N/A		

* To be completed within 30-days from the date of closure letter.

AREA 3

V. TECHNICAL REPORTS, CORRESPONDENCE ETC., THAT THIS CLOSURE RECOMMENDATION WAS BASED UPON

Title:	Date:
Quarterly Groundwater Monitoring Reports (Dunn Corp., Rust E&T)	7/91-12/96
Subsurface Investigation Report (Dunn Corp.)	8/91
Subsurface Investigation Summary Report (Dunn Corp.)	6/92
Sitewide Risk Management Plan (Rust)	5/95

VI. ADDITIONAL COMMENTS, DATA, ETC.

PLEASE INCLUDE/ATTACH THE FOLLOWING AS APPROPRIATE:

1) SITE MAP INDICATING TANK PIT LOCATION, MONITORING WELL LOCATION, GROUNDWATER GRADIENT, ETC.; AND,

2) SITE COMMENTS WORTHY OF NOTICE (E.G., AREA OF RESIDUAL POLLUTION LEFT IN PLACE, DEED NOTICES ETC.)

Continued from above

Letter report of additional wells inside Building 12(Dunn)	March 27, 1992
Remedial Workplan for Area 3. (Rust)	Feb, 1994
Area 3 Monitoring Results (Rust)	Oct, 1994
Soil Investigation and Soil Remediation Activities Report(Rust)	Feb, 1995
Letters Amending the SRMP	Sep, 1995
Baseline Health Risk Assessment (Soma Env. Engineering)	Jan, 1994
Safety Information and Contingency Plan (PES Env.)	Aug, 1995

Attached:

Site Map

Deed Restriction on groundwater use.

If land use changes, a revised risk evaluation may be needed as appropriate

Rust Environment & Infrastructure Inc.

A Rust International Company
12 Metro Park Road
Albany, NY 12205

Phone 518.458.1313
Fax 518.458.2472

November 12, 1996

Sumadhu Arigala
Water Resources Control Engineer
San Francisco Bay Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, CA 94612

Barney Chan
Hazardous Materials Specialist
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, CA 94502

RE: Site Closure Summaries
Former ANC Oakland Facility

Dear Gentlemen:

Enclosed are completed forms for the closure of remedial areas at the above referenced property. All requirements of the Sitewide Risk Management Plan (SRMP), as amended, for Areas 2 and 4, the RCRA area monitoring well, and the monitoring well installed to observe groundwater conditions down gradient from the former acetone UST have been completed. Area 3 groundwater monitoring will continue.

Consistent with the SRMP, please approve closure of these areas by way of a letter stating that no further investigation, remediation, or groundwater monitoring is required in these areas. Upon receipt of such a "no further action" letter, American National Can Company intends to abandon and remove all monitoring wells at the site outside of Area 3.

Thank you for your cooperation in these matters. Please call me if you have any questions.

Sincerely,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

Enclosures

cc: R. Rivetna, ANC
P. Cafferty, Esq. Munger, Tolles
J. Kessler, HSA
R. Williams, KMART
D. Bruegel, Esq. Dickinson, Wright
R. Burzinski, Rust

Area 2

SITE CLOSURE SUMMARY

I. AGENCY INFORMATION

Date:

Agency Name: S.F.B.R.W.Q.C.B.	Address: 2101 Webster Street
City/State/Zip: Oakland, CA 94612	Phone: (510) 286-1255
Responsible Staff Person: Sum Arigala	Title: Water Resources Control Engineer

II. SITE INFORMATION

Site Facility Name: KMART (formerly American National Can Company)		
Site Facility Address: 3801 East 8th Street, Oakland, CA 94601		
RB LUSTIS Case No.:	Local or LOP Case No.:	Priority:
URF Filing Date:	SWEEPS No.:	

Responsible Parties (include addresses and phone numbers)

American National Can Company

8770 West Bryn Mawr Avenue

Chicago IL 60631

Tank No.	Size in Gallons	Contents	Closed In Place/Removed?	Date
1	15,000	Heating oil	Removed	12/2/94

III. RELEASE AND SITE CHARACTERIZATION INFORMATION

Cause and Type of Release: Overfill		
Site characterization complete? (Yes) ~~No~~	Date Approved By Oversight Agency:	
Monitoring wells installed? (Yes) ~~No~~	Number: 3	Proper screened interval? (Yes) ~~No~~
Highest GW Depth Below Ground Surface: 10.44	Lowest Depth: 9.83	Flow Direction: SE
Most Sensitive Current Use: Parking Lot		
Most Sensitive Potential Use and Probability of Use: Parking Lot - 100%		
Are drinking water wells affected? ~~Yes~~ (No)	Aquifer Name: None	
Is surface water affected? ~~Yes~~ (No)	Nearest/Affected SW Name: None	
Off-Site Beneficial Use Impacts (Addresses/Locations): None		
Report(s) on file? (Yes) ~~No~~	Where is report(s) filed? SFBRWQCB / ACDEH	

Area 2

V. TECHNICAL REPORTS, CORRESPONDENCE ETC., THAT THIS CLOSURE RECOMMENDATION WAS BASED UPON

Title:	Date:
Quarterly Groundwater Monitoring Reports	7/91-7/96
Subsurface Investigation Phase I Report	8/91
Phase II Investigation Report	1/92
Subsurface Investigation Summary Report	6/92

continued below

VI. ADDITIONAL COMMENTS, DATA, ETC.

PLEASE INCLUDE/ATTACH THE FOLLOWING AS APPROPRIATE:

1) SITE MAP INDICATING TANK PIT LOCATION, MONITORING WELL LOCATION, GROUNDWATER GRADIENT, ETC.; AND,

2) SITE COMMENTS WORTHY OF NOTICE (E.G., AREA OF RESIDUAL POLLUTION LEFT IN PLACE, DEED NOTICES ETC.)

continued from above

Remedial Workplan for Areas 2 and 4	12/93
Area 2 UST Removal Report	1/95
Remediation Activities Report - Area 2	5/95
Sitewide Risk Management Plan	5/95
Letters amending the SRMP	9/95
Letter: Area Closures Under SRMP	8/96

Attached:

Site Map

Deed Restriction on groundwater use.

Data gathered for 4 consecutive quarters demonstrates that targets for containment areas have been met.

Area 4

SITE CLOSURE SUMMARY

I. AGENCY INFORMATION

Date:

Agency Name: S.F.B.R.W.Q.C.B.	Address: 2101 Webster Street
City/State/Zip: Oakland, CA 94612	Phone: (510) 286-1255
Responsible Staff Person: Sum Arigala	Title: Water Resources Control Engineer

II. SITE INFORMATION

Site Facility Name: KMART (formerly American National Can Company)		
Site Facility Address: 3801 East 8th Street, Oakland, CA 94601		
RB LUSTIS Case No.:	Local or LOP Case No.:	Priority:
URF Filing Date:	SWEEPS No.:	

Responsible Parties (include addresses and phone numbers)

American National Can Company

8770 West Bryn Mawr Avenue

Chicago IL 60631

Tank No.	Size in Gallons	Contents	Closed In Place/Removed?	Date
1	500	Gasoline	Removed	10/92

III. RELEASE AND SITE CHARACTERIZATION INFORMATION

Cause and Type of Release: Overfill		
Site characterization complete? (Yes) No	Date Approved By Oversight Agency:	
Monitoring wells installed? (Yes) No	Number: 3	Proper screened interval? (Yes) No
Highest GW Depth Below Ground Surface: 11.72	Lowest Depth: 11.32	Flow Direction: SE
Most Sensitive Current Use: Parking Lot		
Most Sensitive Potential Use and Probability of Use: Parking Lot - 100%		
Are drinking water wells affected? Yes (No)	Aquifer Name: None	
Is surface water affected? Yes (No)	Nearest/Affected SW Name: None	
Off-Site Beneficial Use Impacts (Addresses/Locations): None		
Report(s) on file? (Yes) No	Where is report(s) filed? SFBRWQCB / ACDEH	

Area 4

V. TECHNICAL REPORTS, CORRESPONDENCE ETC., THAT THIS CLOSURE RECOMMENDATION WAS BASED UPON

Title:	Date:
Quarterly Groundwater Monitoring Reports	7/91-7/96
Subsurface Investigation Phase I Report	8/91
Phase II Investigation Report	1/92
Subsurface Investigation Summary Report	6/92

continued below

VI. ADDITIONAL COMMENTS, DATA, ETC.

PLEASE INCLUDE/ATTACH THE FOLLOWING AS APPROPRIATE:

1) SITE MAP INDICATING TANK PIT LOCATION, MONITORING WELL LOCATION, GROUNDWATER GRADIENT, ETC.; AND,

2) SITE COMMENTS WORTHY OF NOTICE (E.G., AREA OF RESIDUAL POLLUTION LEFT IN PLACE, DEED NOTICES ETC.)

continued from above

Area 4 Remedial Activities Report	3/93
Remedial Workplan for Areas 2 and 4	12/93
Remediation Activities Report - Area 4	2/95
Sitewide Risk Management Plan	5/95
Letters amending the SRMP	9/95
Letter: Area Closures Under SRMP	8/96

Attached:

Site Map

Deed Restriction on groundwater use

Data gathered for 4 consecutive quarters demonstrates that targets for containment areas have been met.

RCRA

SITE CLOSURE SUMMARY

I. AGENCY INFORMATION

Date:

Agency Name: S.F.B.R.W.Q.C.B.	Address: 2101 Webster Street
City/State/Zip: Oakland, CA 94612	Phone: (510) 286-1255
Responsible Staff Person: Sum Arigala	Title: Water Resources Control Engineer

II. SITE INFORMATION

Site Facility Name: KMART (formerly American National Can Company)		
Site Facility Address: 3801 East 8th Street, Oakland, CA 94601		
RB LUSTIS Case No.:	Local or LOP Case No.:	Priority:
URF Filing Date:	SWEEPS No.:	

Responsible Parties (include addresses and phone numbers)

American National Can Company

8770 West Bryn Mawr Avenue

Chicago IL 60631

1-773-399-3392 (R. Rivetna)

Tank No.	Size in Gallons	Contents	Closed In Place/Removed?	Date
N/A				

III. RELEASE AND SITE CHARACTERIZATION INFORMATION

Cause and Type of Release: Accumulated drips and spills over 50 years		
Site characterization complete? (Yes) No	Date Approved By Oversight Agency: 1/96	
Monitoring wells installed? (Yes) No	Number: 1	Proper screened interval? (Yes) No
Highest GW Depth Below Ground Surface:	Lowest Depth:	Flow Direction:
Most Sensitive Current Use: Parking Lot		
Most Sensitive Potential Use and Probability of Use: Parking Lot - 100%		
Are drinking water wells affected? Yes (No)	Aquifer Name: None	
Is surface water affected? Yes (No)	Nearest/Affected SW Name: None	
Off-Site Beneficial Use Impacts (Addresses/Locations): None		
Report(s) on file? (Yes) No	Where is report(s) filed? SFBRWQCB / ACDEH /DTSC	

RCRA

V. TECHNICAL REPORTS, CORRESPONDENCE ETC., THAT THIS CLOSURE RECOMMENDATION WAS BASED UPON

Title:	Date:
Sitewide Risk Management Plan	5/95
Letters amending SRMP	9/95
RCRA Closure Certification Report	12/95
Letter: RCRA Closure Approval from DTSC	1/96
Letter: Area Closures Under SRMP	8/96

VI. ADDITIONAL COMMENTS, DATA, ETC.

PLEASE INCLUDE/ATTACH THE FOLLOWING AS APPROPRIATE:

1) SITE MAP INDICATING TANK PIT LOCATION, MONITORING WELL LOCATION, GROUNDWATER GRADIENT, ETC.; AND,

2) SITE COMMENTS WORTHY OF NOTICE (E.G., AREA OF RESIDUAL POLLUTION LEFT IN PLACE, DEED NOTICES ETC.)

Attached:

Site Map

Deed Restriction on groundwater use

Data gathered for 4 consecutive quarters demonstrates that targets for containment areas have been met.

This document and the related CASE CLOSURE LETTER, shall be retained by the lead agency as part of the official site file.

Acetone UST

V. TECHNICAL REPORTS, CORRESPONDENCE ETC., THAT THIS CLOSURE RECOMMENDATION WAS BASED UPON

Title:	Date:
Sitewide Risk Management Plan	5/95
Acetone UST Removal Report	9/95
Letters amending SRMP	9/95
Letter: Area Closures Under SRMP	8/96

VI. ADDITIONAL COMMENTS, DATA, ETC.

PLEASE INCLUDE/ATTACH THE FOLLOWING AS APPROPRIATE:

1) SITE MAP INDICATING TANK PIT LOCATION, MONITORING WELL LOCATION, GROUNDWATER GRADIENT, ETC.; AND,

2) SITE COMMENTS WORTHY OF NOTICE (E.G., AREA OF RESIDUAL POLLUTION LEFT IN PLACE, DEED NOTICES ETC.)

Attached:

Site Map

Deed Restriction on groundwater use

Data gathered for 4 consecutive quarters demonstrates that targets for containment areas have been met.

This document and the related CASE CLOSURE LETTER, shall be retained by the lead agency as part of the official site file.

Acetone U

SITE CLOSURE SUMMARY

I. AGENCY INFORMATION

Date:

Agency Name: S.F.B.R.W.Q.C.B.	Address: 2101 Webster Street
City/State/Zip: Oakland, CA 94612	Phone: (510) 286-1255
Responsible Staff Person: Sum Arigala	Title: Water Resources Control Engineer

II. SITE INFORMATION

Site Facility Name: KMART (formerly American National Can Company)		
Site Facility Address: 3801 East 8th Street, Oakland, CA 94601		
RB LUSTIS Case No.:	Local or LOP Case No.:	Priority:
URF Filing Date:	SWEEPS No.:	

Responsible Parties (include addresses and phone numbers)

American National Can Company

8770 West Bryn Mawr Avenue

Chicago IL 60631

Tank No.	Size in Gallons	Contents	Closed In Place/Removed?	Date
1	1,000	acetone	Removed	4/95

III. RELEASE AND SITE CHARACTERIZATION INFORMATION

Cause and Type of Release: None		
Site characterization complete? (Yes) No	Date Approved By Oversight Agency: 4/3/95	
Monitoring wells installed? (Yes) No	Number: 1	Proper screened interval? (Yes) No
Highest GW Depth Below Ground Surface: 9.36	Lowest Depth: 8.83	Flow Direction: SE
Most Sensitive Current Use: Parking Lot		
Most Sensitive Potential Use and Probability of Use: Parking Lot - 100%		
Are drinking water wells affected? Yes (No)	Aquifer Name: None	
Is surface water affected? Yes (No)	Nearest/Affected SW Name: None	
Off-Site Beneficial Use Impacts (Addresses/Locations): None		
Report(s) on file? (Yes) No	Where is report(s) filed? SFBRWQCB / ACDEH	

NOTICE OF RESTRICTION OF USE OF PROPERTY
3801 EAST EIGHTH STREET
OAKLAND, CALIFORNIA

Notice is given this 17th day of February, 1994, by American National Can Company ("ANC"), who is the owner of record of certain property situated in Oakland, California, County of Alameda, State of California, known and numbered as 3801 East Eighth Street, Oakland, California, and more fully described in Exhibit "A" attached hereto and incorporated herein by this reference ("the Property") with reference to the following facts:

A. Contaminants are present in the groundwater beneath the Property at levels which are in excess of the California Drinking Water Standards and not suitable for use as a drinking water supply.

B. Contaminants are migrating from adjacent property onto the Property. The Property, which was formerly a manufacturing facility, is intended to be developed for retail use. There are no known currently used sources of drinking water within a one-half mile radius of the Property. Potable water is supplied to the area by the East Bay Municipal Utility District.

C. ANC desires and intends that in order to protect the present or future public health and safety, the Property shall be used in such a manner as to avoid potential harm to persons or property which may result from the presence of contaminants in the groundwater at levels above California Drinking Water Standards.

ARTICLE I
GENERAL PROVISIONS

1.01 Provisions to Run With the Land. This Notice sets forth protective provisions, covenants, restrictions, and conditions, (collectively referred to as "Restrictions"), upon and subject to which the Property and every portion thereof shall be improved, held, used, occupied, leased, sold, hypothecated, encumbered, and/or conveyed. Each and all of the Restrictions shall run with the land, and pass with each and every portion of the Property, and shall apply to and bind the respective successors in interest thereof. Each and all of the Restrictions are imposed upon the entire Property unless expressly stated as applicable to a specific portion of the Property. Each and all of the Restrictions run with the land.

1.02 Concurrence of Owners Presumed. All purchasers, lessees, or possessors of any portion of the Property shall be deemed by their purchase, leasing, or possession of such Property, to be in accord with the foregoing and to agree for and among

themselves, their heirs, successors, and assignees, and the agents, employees, and lessees of such owners, heirs, successors, and assignees, that the Restrictions as herein established must be adhered to for the benefit of future Owners and Occupants, and that their interest in the Property shall be subject to the Restrictions contained herein.

Article II
DEFINITIONS

2.01 Board. "Board" shall mean the Regional Water Quality Control Board - San Francisco Bay Region, and successor agencies, if any.

2.02 Occupants. "Occupants" shall mean those persons entitled by ownership, leasehold, or other legal relationship to the exclusive right to occupy any portion of the Property.

2.03 Owner. "Owner" shall mean ANC or its successors in interest, including heirs, and assigns, who hold title to all or any portion of the Property.

ARTICLE II
DEVELOPMENT, USE, AND CONVEYANCE OF THE PROPERTY

3.01 Restrictions on Use. ANC promises not to use the groundwater for drinking water purposes, until such time it is determined in writing by the Board that the groundwater is suitable for such use.

3.02 Enforcement. Failure of the owner to comply with this restriction, as set forth in paragraph 3.01, shall be grounds for the Board, by reason of the Restrictions, to require that the Owner cease and desist using the groundwater for drinking water purposes, and remove any facilities or equipment designed to draw and distribute groundwater for such purposes. Violation of the Restrictions shall be grounds for the Board to seek administrative or judicial relief against the Owner, as provided by law.

3.03 Notice in Agreements. All Owners shall execute a written instrument which shall accompany or be included in all purchase agreements relating to the Property. The instrument shall contain the following statement:

> "The land described herein is subject to Restrictions which restricts the use of the groundwater beneath the Property for drinking water purposes. Such Restriction renders the owner, lessee, or other possessor of the land subject to, and responsible for compliance with such restriction, and failure to comply with said restriction may subject such persons to actions for enforcement and liability for any damages resulting from such non-compliance."

ARTICLE IV
VARIANCE AND TERMINATION

4.01 Variance. Any Owner or, with the Owner's consent, any Occupant of the Property or any portion thereof may apply to the Board for a written variance from the provisions of this Covenant. Such application shall be made in accordance with applicable law.

4.02 Termination. Any Owner or, with the Owner's consent, any Occupant of the Property or a portion thereof may apply to the Board for a termination of the Restrictions as they apply to all or any portion of the Property. Such application shall be made in accordance with applicable law.

4.03 Term. Unless terminated in accordance with paragraph 4.02 above, by law or otherwise, these Restrictions shall continue in effect in perpetuity.

ARTICLE V
MISCELLANEOUS

5.01 No Dedication Intended. Nothing set forth herein shall be construed to be a gift or dedication, or offer of a gift or dedication, of the Property or any portion thereof to the general public or for any purposes whatsoever.

5.02 Partial Invalidity. If any portion of the Restrictions set forth herein or terms is determined to be invalid for any reason, the remaining portion shall remain in full force and effect as if such portion had not been included herein.

5.04 Article Headings. Headings at the beginning of each numbered article of these Restrictions are solely for the convenience of the parties and are not a part of the Restrictions.

5.05 Recordation. This instrument shall be recorded by the covenantor in the County of Alameda, within (10) days of the date of execution.

IN WITNESS WHEREOF, ANC executes this instrument as of the date set forth above.

OWNER:
AMERICAN NATIONAL CAN COMPANY

BY: G Adams

TITLE: Senior Vice President

DATE: 2/17/1994

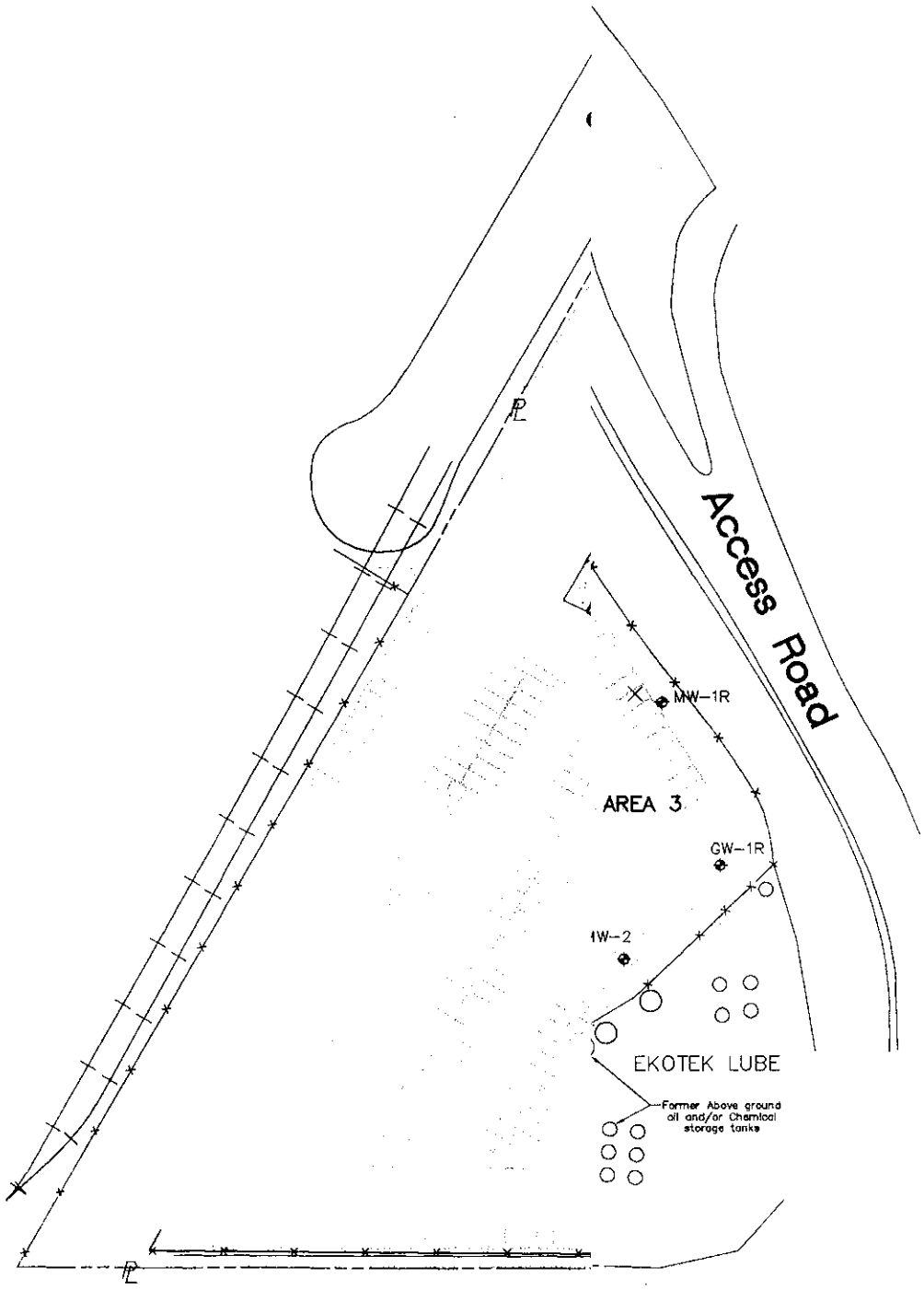
STATE OF ILLINOIS)
)
COUNTY OF Cook)

On February 17, 1994 before me, the undersigned, a Notary Public in and for said state, personally appeared Guy Chandon, personally known to me or proved to me on the basis of satisfactory evidence to be the person who executed the within instrument as Sr. Vice President of the corporation that executed the within instrument, and acknowledged to me that such corporation executed the same pursuant to its bylaws or a resolution of its board of directors.

WITNESS my hand and official seal.

" OFFICIAL SEAL "
ELAINE RUFENER
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 3/2/94

Elaine Rufener
Notary Public in and for said
County and State



SITE MAP

AMERICAN NATIONAL CAN COMPANY

FORMER OAKLAND PLANT

35195-BK	SCALE 1"=100'	FIGURE NO.

9/20/96

Meeting Regarding KMART (former ANC site) Oakland at RWQCB #2 office

Name	phone number	Company
PAT CAFFERTY	(415) 512-2000	OTTO/ANCC
Rob Rivetna	312 399-3392	ANC
Ed Alusow	518-437-8373	RUST
Steve Morse	510-286-0304	RWQCB
Sum Arigala	510-286-0434	RWQCB
ROB CROPS	415-899-1600	PES Environmental
David Bruegel	810-433-7272	Kmart - Dickinson Wright
Ravi Arulanantheams	510-286-1331	RWQCB
Barney Chan	510-567-6765	ACEH-LOP

August 23, 1996

Mr. William D. Wick, Esq.
Crosby, Heafey, Roach & May
1999 Harrison Street
Oakland, California 94604-2084

Subject: Former ANC and Ekotek sites, Oakland, California

Dear Bill:

On behalf of Kmart Corporation and American National Can Company (ANC), this letter responds to your requests for information contained in your letter to PES Environmental, Inc. of June 11, 1996. A copy of your request has also been provided to High Street Associates.

ANC and its consultants, during the investigations prior to closure and redevelopment of the former ANC facility, evaluated potential contributions to subsurface water from utilities and subsurface structures on that site. The conclusion was that there were no water releases from utilities and subsurface structures that would appreciably affect groundwater levels. Additionally, ANC retained SOMA Environmental Engineering to evaluate and model hydrogeologic conditions as part of the health risk assessment required by staff of Alameda County Health and the Regional Water Quality Control Board. These matters were exhaustively reviewed and approved by ACDEH, RWQCB, City of Oakland, ANC, Kmart, and High Street Associates.

We also understand that, as part of High Street Associates' demolition of the former ANC facility, all former water supply pipelines and sewer lines were cut at the property boundary and sealed off.

We appreciate EKI's and your efforts to comprehensively investigate underground structures and utilities that may affect groundwater mounding conditions beneath the two properties. Nevertheless, because (1) the locus of the groundwater mound has for years been shown by monitoring to be on the former Ekotek property, and (2) the mound has persisted irrespective of significant changes in utilities on the former ANC facility as that site was demolished then redeveloped, it is clear that the cause of the groundwater mound is (or was) located on the former Ekotek site. We are available to discuss these matters in detail with EKI if that would be helpful.

Yours very truly,

PES ENVIRONMENTAL, INC.

Robert S. Creps, P.E.
Principal Engineer

RUST ENVIRONMENT AND INFRASTRUCTURE, INC.

Edward W. Alusow
Senior Project Manager

cc: Rohinton Rivetna
Pat Cafferty
Rich Williams
David Bruegel
Jim Kessler
Steve Morse
Sum Arigala
Barney Chan

3890201L.013

8/21/1996

Meeting with ANCC, KMART, Consultants regarding
3801 East 8th st. (former ANCC site) &
4200 Alameda Ave (former Ekotech site) at RWQCB, Oakland

Name	Organization	phone number
Sum Arigala	RWQB	510 286 0434
Barney Chan	ACEH	510-567-6765
PAT CAFFERTY	MTO/ANCC	(415) 512-4000
Rob Rivetna	ANC	(312) 399 3392
Ed Alusow	RUST	518-437-8373
Steve Morse	Rust E&S	510-286-0304
David Bruegel	Dickinson Wright	810-433-1272
Robert Craps	PES Environmental	415-899-1600

RUST ENVIRONMENT & INFRASTRUCTURE

12 METRO PARK ROAD
ALBANY, NEW YORK 12205
(518) 458-1313
Fax: (518) 458-2472

FAX TRANSMISSION COVER SHEET

Date:	*August 19, 1996*
To:	*Barney Chan / Sum Arigala*
Fax:	510-337-9335 / 510-286-1380
Re:	*SRMP Area Closures - Former ANC Oakland*
Sender:	Edward W. Alusow

Attached is a copy of a letter and attached analytical summary tables concerning the SRMP for the KMART (former ANC) property in Oakland. We hope to discuss it with both of you during our meeting on Wednesday. At that time I will have available the laboratory reports for your review, if you so desire.

YOU SHOULD RECEIVE 10 PAGE(S), INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL 518-437-8373 .

RUST ENVIRONMENT & INFRASTRUCTURE

RUST Environment & Infrastructure Inc.
12 Metro Park Road
Albany, NY 12205
Tel. (518) 458-1313 • FAX (518) 458-2472

January 30, 1996

Sumadhu Arigala
Water Resources Control Engineer
San Francisco Bay Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, CA 94612

Barney Chan
Hazardous Materials Specialist
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, CA 94502

RE: Fourth Quarter 1995 Report
Sitewide Risk Management Plan
Former ANC Oakland Facility

Dear Messrs. Arigala and Chan:

Rust Environment & Infrastructure (Rust) has completed an 18th round of quarterly groundwater monitoring at the subject site. This is the first round of monitoring conducted following the implementation of the Site-Wide Risk Management Plan (SRMP). The enclosed report, entitled "SRMP Quarterly Groundwater Monitoring Report; Fourth Quarter, 1995" documents the results of the monitoring.

Highlights from the report include:

- Area 3 monitoring results indicate that the groundwater mound still persists. As of December 4, 1995, the mound increased in height, which is consistent with seasonal trends of previous years, and indicates a minor, if any at all, influence from a leaking water pipe;

- The thickness of product in Area 3 wells GW-2R, MW-2 and MW-5 increased through the last quarter of monitoring, apparently due to the seasonal decrease in groundwater elevation;

- Groundwater analytical results were generally consistent with historical data. Data has been obtained to begin assessing groundwater quality downgradient from the former RCRA Drum Storage Area and a former acetone underground storage tank.

The enclosed report provides a description of several activities that were performed in conjunction with implementing the SRMP (i.e., install SRMP monitoring well network). In addition, the report provides an update (through December, 1995) of monthly mound height and product thickness that is being performed at Area 3 of the site. Future quarterly reports will fulfill the requirments of the SRMP but will be in a letter format, similar to previous quarterly monitoring reports for the site. If you have any questions, please call me.

Sincerely,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

Enclosure

cc: E. Rawlings ANC
R. Rivetna ANC
P. Cafferty Munger, Tolles
J. Kessler, HSA
R. Creps, PES
D. Bruegel, Esq., Dickinson, Wright

RUST ENVIRONMENT & INFRASTRUCTURE

Letter of Transmittal

Barney Chan

TO: Hazardous Materials Specialist
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway; Room 250
Alameda, CA. 94502

DATE 9-20-95	PROJECT NO. 35195.700
ATTENTION Barney Chan	
RE: SRMP Well Location Map.	

WE ARE SENDING YOU:

☐ Attached ☐ Prints ☐ Under separate cover via _____ the following items:
☐ Shop drawings ☐ Change order ☐ Plans ☐ Samples ☐ Specifications
☐ Copy of letter ☐ _____

COPIES	DATE	NO.	DESCRIPTION

THESE ARE TRANSMITTED AS CHECKED BELOW:

☐ For approval ☐ Approved as submitted ☐ Resubmit _____ copies for approval
☐ For your use ☐ Approved as noted ☐ Submit _____ copies for distribution
☐ As requested ☐ Returned for corrections ☐ Return _____ corrected prints
☐ For review and comment ☐ _____
☐ For Bids Due _____ 19 _____ ☐ Prints Returned After Loan to Us

REMARKS: Barney,
Here is a copy of the SRMP proposed well locations site map I said I would get to you.

COPY TO: _____ SIGNED: Richard Bryls

White Copy - Client Yellow Copy - Project File Pink Copy - Library File

If enclosures are not as noted, kindly notify us at once.

695 River Oaks Parkway • San Jose, California 95134 • (408) 232-2800 • Fax: (408) 232-2801

RUST Rust Environment & Infrastructure Inc.

Rust Environment & Infrastructure, P.E., ARCH & L.S. P.C.
12 Metro Park Road
Albany, NY 12205

Phone 518 458 1313
Fax 518 458 2472

September 19, 1995

Sumadhu Arigala
Water Resources Control Engineer
San Francisco Bay Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

Barney Chan
Hazardous Materials Specialist
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, CA 94502

RE: Amendment to the Addendum to the SRMP
Former ANC Oakland Facility

Gentlemen:

It was brought to our attention that there was an error in the Addendum to the Sitewide Risk Management Plan (SRMP) that was promulgated in a letter dated September 12, 1995. The total number of monitoring wells proposed to be monitored in the Plan remains the same at seventeen (17); however, the listing of monitoring wells in paragraph one contained errors.

As was discussed in the text, there is no monitoring well proposed for the Temporary Storage Area; and, the well proposed to monitor the groundwater at the location of the former acetone underground storage tank was mistakenly omitted from the list. The corrected listing should read as follows:

Location	Well No.	Potential Source Monitored
AREA 2	TW-1	Heating Oil UST - at the source
	MW-13	Heating Oil UST - upgradient from the source
	SRMP-1	Heating Oil UST - down gradient from the source
	MW-7	Building #12 - at the source
	SRMP-2	Acetone UST - at the source
AREA 3	MW-1	Ekotek, Inc. - down gradient from the source
	MW-2	Ekotek, Inc. - down gradient from the source
	MW-3	Ekotek, Inc. - down gradient from the source

	MW-4	Ekotek, Inc. - down gradient from the source
	MW-5	Ekotek, Inc. - down gradient from the source
	MW-6	Ekotek, Inc. - down gradient from the source
	GW-1R	Ekotek, Inc. - down gradient from the source
	GW-2R	Ekotek, Inc. - down gradient from the source
AREA 4	MW-14	Product UST - down gradient from the source
	MW-9	Product UST - down gradient from the source
	SRMP-3	Product UST - down gradient from the source
RCRA	SRMP-4	RCRA Storage Areas - down gradient from the source

We apologize for any inconvenience that may have resulted by this error. If you have any questions or comments on the SRMP, please call me.

Sincerely,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

cc: E. Rawlings, ANC
R. Rivetna, ANC
J. Kessler, HSA
R. Creps, PES
R. Williams, Kmart
D. Bruegel, Esq., Dickinson, Wright
R. Arulananthum, SFBRWQCB
S. Krival, DTSC
P. Cafferty, Esq., Munger, Tolles & Olson

September 14, 1995

Valerie Heusinkveld (replacing D. Murphy)
Associate Hazardous Materials Specialist
Cal-EPA, DTSC Region 2
700 Heinz Avenue, Suite 300
Berkeley, CA 94710-2737

RE: RCRA CLOSURE
FORMER ANC OAKLAND FACILITY

Dear Ms. Heusinkveld:

We thank you for the opportunity provided to meet with us and discuss several issues regarding the former ANC Oakland site.

As a follow-up to the meeting of August 23, 1995, I would like to confirm our understanding of conversations that took place between you, Steve Krival, Ed Rawlings, Ed Alusow, and me. During that meeting, we discussed various aspects of the RCRA closure, the CEQA process and the ongoing management of the sitewide issues.

As was proposed by Mr. Lester Kaufman in his letter to Joseph S. Moran, Esq., of American National Can Company (ANC) dated August 4, 1995, we encourage your staff to proceed with discussions with the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) to allow that agency to provide oversight of the management of the TSA Contamination under the Sitewide Risk Management Plan (SRMP). In response to Steve Krival's concerns, we have instructed Rust to work with the Regional Board and Alameda County to ensure that the SRMP addresses the potential impacts from both the former, and soon to be closed, storage areas as well as the TSA. The storage areas were addressed in the original SRMP, while the TSA is addressed in the Addendum to the SRMP. With the incorporation of the ongoing risk management of the RCRA areas and the TSA into the SRMP, it is our understanding that all closure activities are completed pending the receipt of, and response to, public comments, if any, resulting from the CEQA Public Notice process.

If there is anything that ANC or Rust can do to assist in this transition of oversight from your agency to the SFBRWQCB, please advise us. We would be more than happy to provide whatever help we can in expediting the formulation and implementation of the SRMP and the management of remaining issues in conjunction with the closure process.

In addition to the topics above, I would like also to reiterate my understanding of the schedule that your staff suggested be followed:

-Finalize CEQA Package	Mid- to late September
-Begin Public Notice Period	Early to mid-October (10 days after final CEQA package)
-Receive Public Comments	Early to late November (10 days after receiving comments)
-Amend Closure Plan, if necessary	Mid- to late November (10 days after comments, if any)
-Complete Closure Process	December 15

Once again, let me assure you that both ANC and Rust are committed to completing this closure process properly and as quickly as possible. In that light, we are prepared to assist your staff in any way to keep the closure process moving forward.

Sincerely,

Rohinton M. Rivetna
Director
Environmental Engineering

cc: E. Rawlings 12L
E. Alusow RUST
S. Arigala
B. Chan
S. Krival
L. Kaufman
R. Burzinski
R. Creps

rmr004/gs

RUST Rust Environment & Infrastructure Inc.

A Rust International Company
12 Metro Park Road
Albany, NY 12205

Phone 518 458 1313
Fax 518 458 2472

September 12, 1995

Sumadhu Arigala
Water Resources Control Engineer
San Francisco Bay Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

Barney Chan
Hazardous Materials Specialist
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, CA 94502

RE: Addendum to the Sitewide Risk Management Plan
Former ANC Oakland Facility

Gentlemen:

This Addendum is provided in response to Mr. Chan's letter of August 2, 1995, and to various discussions and requests during our meeting on August 23, 1995. The primary question posed in the August 2 letter is when will groundwater monitoring wells - both new wells and replacement wells - be installed. It is our intention, after consultation with Kmart representatives, to begin monitoring well installation during September. This schedule will fit a window of time between the emplacement of parking lot curbing, due to be completed by September 1, and the landscaping and planting in the parking lot islands, due to begin on October 1. Since the monitoring wells will be installed in the parking lot islands, our installation schedule will shift if and when the curbing/landscaping schedule shifts. The monitoring wells will be located as follows:

Location	Well No.	Potential Source Monitored
AREA 2	TW-1	UST
	MW-13	UST
	SRMP-1	UST
	MW-7	Building #12
AREA 3	MW-1	Ekotek, Inc.
	MW-2	Ekotek, Inc.
	MW-3	Ekotek, Inc.

	MW-4	Ekotek, Inc.
	MW-5	Ekotek, Inc.
	MW-6	Ekotek, Inc.
	GW-1R	Ekotek, Inc.
	GW-2R	Ekotek, Inc.
AREA 4	MW-14	UST
	MW-9	UST
	SRMP-2	UST
RCRA	SRMP-3	RCRA Storage Areas
	SRMP-4	Temporary Storage Area

This Sitewide Risk Management Plan (SRMP) was developed to monitor groundwater at specific containment boundaries (points of compliance) to evaluate potential impacts from releases that may have occurred in previously delineated areas of concern (Areas 2 through 4). The groundwater at this site is limited in its future use by deed restrictions, and therefore is not a potential threat to human health. Specific responses to your other questions and comments follow:

Area 2

The acetone tank, removed from a location not related to any of the areas of concern, will be addressed in the SRMP along with the concerns in Area 2. The Tank Closure Report is being prepared and will be submitted separately. As part of the anticipated September monitoring well installation activities, a monitoring well will be installed in the vicinity of the location from which the tank was removed. Groundwater samples from this well will be analyzed for the contaminant of concern, acetone, utilizing USEPA SW-846 Method 8240.

Area 3

Previously decommissioned monitoring well MW-1 will be reinstalled as presented in the SRMP. However, in accordance with your request, in addition to being analyzed for TPH as mineral spirits to evaluate the potential for impact by Building #12 activities, this well will be analyzed for the same suite of analytes as other Area 3 monitoring wells: volatile organic compounds (Method 8240); semi-volatile organic compounds (Method 8270); and, TPH as diesel and TPH as gas by Cal-DHS methods. In addition, all samples from Area 3 monitoring wells will be analyzed for polychlorinated biphenyls (PCB) utilizing Method 8080. Consistent with the SRMP implementation for Area 3, any wells exhibiting free floating product during any quarterly sampling round will not be purged and sampled for that quarter.

Temporary Storage Area (RCRA Closure)

Following the removal of wastes from the Temporary Storage Area (TSA), 17 post-removal soil samples were collected and analyzed for contaminants that were of concern to the closure process. The analyses revealed total petroleum hydrocarbons as diesel (TPH-diesel) in exceedance of the DTSC Performance Standard of 100 parts per million in all but 3 of the samples analyzed.

The construction of the TSA was designed to prevent releases of wastes. Wastes that were characterized during the 1st and 2nd Soil Sampling Plans at the RCRA Storage Areas that contained contaminants of concern at the highest concentrations (characteristic hazardous waste) were placed into pre-lined roll-off bins. After waste was placed into the lined bins, a solid plastic cover was placed over them. This design prevented precipitation from contacting the waste and the plastic liner prevented any inherent moisture in the waste from leaking out. Wastes that were characterized to have relatively low concentrations of contaminants of concern were placed into a lined "Containment Cell". The Containment Cell consisted of a bottom liner and cover. The liner consisted of two overlain 20-mil. thick polyethylene sheets. A layer of mixed sand and gravel were placed on top of the 40-mil thick liner to prevent trucks from puncturing it as they backed into the cell to dump loads of soil. After all waste was placed into the containment cell, it was covered with another polyethylene sheet. The polyethylene cover was secured at the perimeter of the stockpile such that it overlapped the bottom liner. This construction caused any precipitation to run-off without contacting the stored wastes.

Based on the above description of the TSA, we have concluded that the petroleum hydrocarbons detected in the soil beneath the TSA location were unrelated to the TSA and reflect a general condition of the near-surface soil beneath a former parking lot and adjacent to Ekotek, Inc. As such, there was no definable "release" that could result in a potential impact to groundwater. Therefore, no monitoring of a groundwater containment boundary in this location is appropriate.

Moreover, the location of the TSA occupied the portion of the ANC property that overlies the plume of groundwater contamination and free floating product that emanates from Ekotek, Inc. The presence of contamination from the neighboring property would overwhelm and mask any possible presence of an impact from the soils beneath the TSA, and monitoring such potential impact would be futile.

As to the protection of the health and safety of site construction workers during construction activities that may take place in the vicinity of the TSA, it is our understanding that PES Environmental, Inc., under contract to the property owners and acting as their environmental consultants, have prepared and submitted for review an Addendum, dated August 9, 1995, to their Safety Information & Contingency Plan for the site dated March 3, 1995.

Drum Storage Area and Solder Dross Storage Area (RCRA Closure)

As stated in the original SRMP, ANC intends to install one monitoring well in the vicinity of the former RCRA Storage Areas to be located downgradient from the Drum Storage Area. DTSC has not required any additional wells in that area.

If you have any questions or comments on this Addendum to the SRMP, please call me.

Sincerely,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

cc: E. Rawlings, ANC
R. Rivetna, ANC
J. Kessler, HSA
R. Creps, PES
R. Williams, Kmart
D. Bruegel, Esq., Dickinson, Wright
R. Arulananthum, SFBRWQCB
S. Krival, DTSC
P. Cafferty, Esq., Munger, Tolles & Olson

RUST Rust Environment & Infrastructure Inc.

A Rust International Company
12 Metro Park Road
Albany, NY 12205

Phone 518.458.1313
Fax 518.458.2472

August 28, 1995

Barney Chan
Hazardous Materials Specialist
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, CA 94502

RE: Meeting on August 23, 1995

Dear Mr. Chan:

On behalf of American National Can Company and Rust Environment & Infrastructure, thank you for taking time from your busy schedule to meet with us last Wednesday. We think the meeting was worthwhile and look forward to completing all requirements for bringing to a close ANC's obligations at their former facility.

I am assembling a package of materials concerning the results of work performed at the site that we discussed during the meeting and will send it to this week to you and Sum at the SFBRWQCB. In the meantime, if you have any questions or comments, please do not hesitate to call me.

Once again, thank you for a positive and fruitful meeting.

Sincerely,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

cc: T. Eagleson
E. Rawlings
R. Rivetna
R. Burzinski

MEETING AGENDA

August 23, 1995
10:30 A.M.

FORMER AMERICAN NATIONAL CAN COMPANY FACILITY
OAKLAND, CALIFORNIA

1. INTRODUCTIONS OF TEAM MEMBERS

   Alameda County Department of Environmental Health - Barney Chan

   San Francisco Bay Regional Water Quality Control Board - Sum Arigala

   American National Can Company - Tom Eagleson, Ed Rawlings, and Rohinton Rivetna

   Rust Environment & Infrastructure - Ed Alusow and Dick Burzinski

2. DISCUSSION OF MEETING OBJECTIVES

3. STATUS OF SITE WIDE RISK MANAGEMENT PLAN

4. OTHER ISSUES

Post-it™ brand fax transmittal memo 7671	# of pages ▸ 1
To Barney Chan	From Ed Alusow
Co.	Co.
Dept.	Phone #
Fax #	Fax #

STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, *Governor*

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

August 4, 1995

rec'd 8/23/95

Joseph S. Moran
Assistant General Counsel - Environmental
American National Can Company - 14C
8770 West Bryn Mawr Avenue
Chicago, IL 60631-3542

COPY

Dear Mr. Moran,

RE: American National Can-Oakland, Temporary Storage Area, EPA ID. No. 009 162 116.

This is in response to your letter to us dated July 31, 1995 with regard to the above referenced matter.

Our review of your submittals to date demonstrate that requirements under section 9.1 of the consent order entered into between the Department of Toxic Substances Control (DTSC) and American National Can, dated July 6, 1995, have been satisfied.

The requirements imposed under section 9.2 of the consent order have not been satisfied because analyses of the samples demonstrate the presence of contamination, and the sampling results do not adequately define the nature and extent of contamination. Thus, the need for further removal or other remedial action has not been adequately addressed.

DTSC is currently working with the San Francisco Bay Regional Water Quality Control Board to streamline and consolidate all required remediation under the Site-Wide Risk Management Plan. DTSC will continue to work with the Regional Board to ensure that requirements imposed by the consent order, closure plan, and any other applicable State or local requirements are complied with at this time.

Please contact Steve Krival of my staff at (510) 540-3959 should we be of further assistance in this matter.

Yours Sincerely,

Lester Kaufman, Chief
Facility Permitting Branch

Certified Mail No. P 393 789 805

cc. Edward Alusow
RUST Environment & Infrastructure Inc.
12 Metro Park Road
Albany, NY 12205

David Bruegel, Esq.
Dickenson, Wright, Moon, Van Drusen
P. O. Box 509
Bloomfield Hill, MI 48303-0509

Sumdhu Arigala
SF Bay RWQCB
2101 Webster Street, #500
Oakland, CA 94612

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Environmental Protection Division
1131 Harbor Bay Parkway, #250
Alameda, CA 94502-6577
(510) 567-6700

August 2, 1995
STID # 1453

Mr. Joseph S. Moran, Esq.
Assistant General Counsel-Environmental
American National Can
Mail Suite 14C
8770 West Bryn Mawr Ave.
Chicago, Illinois 60631-3542

Re: Request for Update on Sitewide Risk Management Plan (SRMP) for Former ANC Facility, 3800 E. 8th St., Oakland CA 94601

Dear Mr. Moran:

This letter provides comment and requests an update on the SRMP for the former ANC facility in Oakland, site of the future K-Mart. As you are aware, our office and that of the RWQCB reviewed RUST's February 15, 1995 Outline-SRMP and met with your consultant to discuss its contents. Comments were incorporated in RUST's May 1995 report. Since this time additional developments have occurred at the site . It appears that the closure of the former RCRA permitted areas has been ANC's priority since the SRMP has not been addressed in any recent reports.

This letter requests specific information and gives the County's comment on new developments. I refer you to the May 1995 SRMP and comment on additions or deviations from the proposed actions in this report. I will address my comments to areas as they have been previously designated.

Area 2- Proposed work in this area will consist of the reinstallation of TW-1 and an additional well approximately 50 feet downgradient to this well. **Please provide a time schedule for the installation of these two wells.**

Within Area 2, an acetone tank was removed near Area 2 on April 5, 1995. There was evidence of release of soil contamination and overexcavation and sampling was performed. To date, our office has yet to receive the tank removal report for this activity. In addition, our office would like to know how this release will be incorporated in the SRMP. **Please provide a tank closure report for the acetone tank and address how this event will be addressed in your SRMP.**

Area 3- In essence, this area would continue to monitor all existing wells for the suite of parameters: VOCs via Method 8240, semi-volatiles via Method 8270, TPHg and TPHd. Additionally, MW-1 previously decommissioned will be reinstalled. Based on what was detected in Building #12 soils, the replacement well for MW-1 should be analyzed for the same analytes as the other wells. TPH as mineral spirits should also be run in the replacement well. **Please provide a time schedule for the installation of the replacement well for MW-1.**

Area 4- In addition to MW-14, a replacement well for MW-9 and a new well east of MW-14 will be installed. Recently, through conversation with Mr. Steve Krival of DTSC it appears that concentrations of contaminants have been detected in the surface soils of the temporary storage area for the excavated materials from the permitted areas. The presence of this contamination has not yet been resolved. Should there be a need to install a monitoring well downgradient to this area, please identify its location and the analytes of concern for this well. If a well is not necessary please describe how this decision is justified. **Please provide a time schedule for the installation of the wells in this area.**

As you're aware, our office has been overseeing the subsurface investigation at the former Ekotek site. Their initial investigation occurred in July 1995 and a report is anticipated in September 1995. Based on the results of this investigation, you may be able to determine if the contamination in temporary storage area is from the Ekotek site.

Area 5- One monitoring well was proposed within ten feet of the former Drum Storage Area in the assumed downgradient direction. Additional monitoring wells were at one time mentioned as a requirement of DTSC. **Please inform our office if more that one well is proposed for this area and provide a time schedule for well(s) installation.**

Please provide the requested report and technical information to our office **within 30 days or by September 5, 1995.**

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

Sincerely,

Barney M. Chan

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
S. Arigala, RWQCB
R. Arulanantham, RWQCB
J. Kessler, High Street Associates
S. Krival, DTSC
E. Alusow, RUST E&I
W. Howard, RUST E&I
R. Burzinski, RUST E&I
R. Williams, Kmart Corporation
D. Bruegel, Esq., Dickinson, Wright
R. Creps, PES Environmental
Ms. J. Peters, ANC
T. Peacock, files

updtSRMP

American National Can

PECHINEY GROUP

July 31. 1995

Recd 8/23/95

Lester Kaufman, Chief
Facility Permitting Branch
Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, CA 94710

RE: In the Matter of American National Can, 3801 East 8th Street, Oakland, California

Dear Mr. Kaufman:

Enclosed is a report from American National Can Company's (ANC) consultant regarding the removal and confirmatory sampling of the RCRA temporary storage area at ANC's former Oakland facility. The intent of the report is to satisfy the last requirement contained in the Consent Order entered into with your department on July 6, 1995.

Sampling indicated elevated levels of TPH-diesel. The report, however, indicates that the source was other than from the temporary storage area. It is our consultant's opinion that the stockpiled soil and debris was secure, and did not leave the temporary storage area. Also, the higher levels of TPH reportedly interfered with the lab's ability to analyze some of the other analytes at the very low detection levels specified by your office. As you are aware, the presence of other contaminants across the site had been acknowledged prior to the temporary staging of soils and debris from the RCRA closure, and is being managed by the site-wide management plan, under the auspices of the Regional Water Quality Control Board. We believe that that plan adequately safeguards any health and safety concerns.

Thank you for your efforts, and those of your staff to facilitate the expedited removal. We look forward to finalizing the closure process, and allowing Kmart's development to go forward. Please contact me if I may be of further assistance.

Very truly yours,

Joseph S. Moran
Assistant General Counsel, Environmental

JSM/da
Enclosure
c:\legljef\wp\oakland.mem

RUST Rust Environment & Infrastructure Inc.

A Rust International Company
12 Metro Park Road
Albany, NY 12205

Phone 518.458.1313
Fax 518.458.2472

July 31, 1995

Joseph S. Moran, Esq.
Assistant General Counsel - Environmental
American National Can Company - 14C
8770 West Bryn Mawr Avenue
Chicago, IL 60631-3542

RE: RCRA Temporary Storage Area
ANC Oakland

Dear Mr. Moran:

Following the removal of wastes from the Temporary Storage Area (TSA), 17 post-removal soil samples were collected and analyzed for the contaminants of concern. The analyses revealed total petroleum hydrocarbons as diesel (TPH-diesel) in exceedance of the DTSC Performance Standard in all but 3 of the samples analyzed. The Consolidated Sample Results Report, submitted on July 27, 1995, to Steve Krival of DTSC contained the sample results.

Available information indicates that the elevated petroleum hydrocarbons in the post-removal samples were caused by a source other than the wastes stored in the TSA. The site of the TSA was an asphalt parking lot prior to the demolition of the ANC facility. Demolition activities in this area included the removal of the layer of asphalt around a large area of the site, including the vicinity of the TSA. Underlying the layer of asphalt was a layer of sub-base including a compact mixture of sand and gravel. The sub-base layer was not removed during demolition and now is present at and near ground surface.

The laboratory analytical results of the 17 post-removal soil samples collected from the TSA indicate that the petroleum hydrocarbons in this sub-base material are related to paving processes as discussed below, rather than releases of stored wastes. Firstly, the TPH-diesel analyses revealed relatively heavy fractions of hydrocarbons (C9-C24 range) that would be consistent with the types of oils used in paving.

Secondly, other chemical compounds associated with the stored wastes (i.e., volatile organics) were not detected at significant concentrations, and were below the applicable DTSC Performance Standard. These compounds, if present, would have been beneath the lined TSA and, thus, protected from volatilization.

The construction of the TSA was designed to prevent releases of wastes. Wastes that were characterized during the 1st and 2nd Soil Sampling Plan that contained contaminants of concern at the highest concentrations (characteristic hazardous waste) were placed into pre-lined roll-off bins. After waste was placed into the lined bins, a solid plastic cover was placed over them. This design

prevented precipitation from contacting the waste and the plastic liner prevented any inherent moisture in the waste from leaking out. Wastes that were characterized to have relatively low concentrations of contaminants of concern were placed into a lined "Containment Cell". The Containment Cell consisted of a bottom liner and cover. The liner consisted of two overlain 20-mil. thick polyethylene sheets. A layer of mixed sand and gravel were placed on top of the 40-mil thick liner to prevent trucks from puncturing it as they backed into the cell to dump loads of soil. After all waste was placed into the containment cell, it was covered with another polyethylene sheet. The polyethylene cover was secured at the perimeter of the stockpile such that it overlapped the bottom liner. This construction caused any precipitation to run-off without contacting the stored wastes.

There are at least two scenarios by which the sub-base layer could contain high levels of petroleum hydrocarbons from previous asphalt surfacing procedures. The first scenario is that the parking lot area was a stone and oil surface. In many historical situations, paving processes included compacting a layer of stone and applying an asphaltic oil to harden and consolidate the surface. The oil typically would penetrate the surface of the stone layer. Additional coats of oil may be applied subsequently to prevent dust during dry periods. The second scenario is that a "tack coat" of oil was applied to the sub-base prior to placing the asphalt surface. In either of these situations, the sub-base underlying the asphalt would contain petroleum hydrocarbons.

Observations by personnel at the site, experienced environmental consultants representing both the buyer and the seller, during the post-removal sampling support the presence of petroleum-impacted soils consistent with oiled sub-base materials under asphalt pavement.

Organic lead detected in post-removal samples at low concentrations can only be from non-site sources such as the exhaust from vehicular traffic on the adjacent roadways. The limited amount of organic lead encountered in the pre-excavation sampling of the two RCRA storage areas is not consistent with the widespread, but low level, occurrence of the compound in the post-removal samples. It is, however, to be expected in near surface soils so close to major roads such as the Nimitz Freeway, only several hundred yards from the TSA, and other nearby industrial sources.

Based on the above interpretations of the sampling and analytical results, it is our opinion that the petroleum hydrocarbons and organic lead encountered in the samples from beneath the TSA were not the result of a release from the TSA; but that they resulted from historical site uses, i.e., the paving of the parking lot in that portion of the property and the proximity to the Nimitz Freeway. Therefore, the requirements of the Consent Order dated July 6, 1995, have been satisfied in their entirety.

Sincerely,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

cc: E. Rawlings

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12 Metro Park Road
Albany, NY 12205

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Fax 518.458.2472

July 19, 1995

Daniel F. Murphy
Supervising Hazardous Substances Engineer I
Cal-EPA, DTSC , Region 2
700 Heinz Avenue, Suite 200
Berkeley, California 94502

RE: Former American National Can Company Facility
Oakland, California
EPA ID# 009 162 116

Dear Mr. Murphy:

This letter serves to clarify our July 17, 1995 letter to you which specified the statistical analysis to be performed on post-removal soil samples collected from the Temporary Storage Area. At the request of Steve Krival of your staff, a statistical analysis referenced in "Methods for Evaluating the Attainment of Cleanup Standards", Volume I, Chapter 6, USEPA, 1989 will be used to statistically analyze the samples from the temporary storage area. A excerpt from that document describing this statistical analysis is enclosed.

The statistical analysis will be performed for each analyte of concern and for each functional area as originally specified in the June 13, 1995 letter from DTSC. If any upper confidence limit result exceeds the applicable Performance Standard, then the functional area will be subject to additional sampling as outlined in the June 13, 1995 letter from DTSC.

Sincerely,

Edward W. Alusow
Senior Project Manager

Enclosure

cc: J. Moran, Esq., ANC
R. Gere, ANC
E. Rawlings, ANC
J. Kessler, HSA
R. Creps, PES
S. Krival, DTSC
R. Williams, Kmart
D. Bruegel, Esq., Dickinson, Wright
R. Arulananthum, SFBRWQCB
S. Arigala, SFBRWQCB
B. Chan, ACDEH
W. Howard, RUST

CHAPTER 6: DETERMINING WHETHER THE MEAN CONCENTRATION OF THE SITE IS LESS THAN A CLEANUP STANDARD

The formula for an **upper *one-sided* 100(1-α) percent confidence limit** around the population mean is presented in Box 6.7. The one-sided confidence interval should be used to test whether the site has attained the cleanup standard. The corresponding decision rule is given in section 6.3.4.

Box 6.7
Computing the Upper One-sided Confidence Limit

$$\mu_{U\alpha} = \bar{x} + t_{1-\alpha,df}\frac{s}{\sqrt{n}} \qquad (6.8)$$

where $\bar{x}$ is the computed mean level of contamination, and s is the corresponding standard deviation. The appropriate value of $t_{1-\alpha,df}$ can be obtained from Table A.1.

6.3.4 Inference: Deciding Whether the Site Meets Cleanup Standards

To determine whether the site meets a specified cleanup standard, use the upper one-sided confidence limit $\mu_{U\alpha}$, defined above in equation (6.8). Use the following rule to decide whether or not the site attains the cleanup standard:

If $\mu_{U\alpha} < Cs$, conclude that the area is clean (i.e., $\mu < Cs$).

If $\mu_{U\alpha} \geq Cs$, conclude that the area is dirty (i.e., $\mu \geq Cs$).

Box 6.8 presents an example of an evaluation of cleanup standard attainment.

RUST ENVIRONMENT & INFRASTRUCTURE

12 METRO PARK ROAD
ALBANY, NEW YORK 12205
(518) 458-1313
Fax: (518) 458-2472

FAX TRANSMISSION COVER SHEET

Date:	*July 17, 1995*
To:	*Daniel F. Murphy*
Fax:	*510-540-3937*
Re:	*Former ANC Oakland Facility* *RCRA Temporary Storage Area*
Sender:	Walter O. Howard

YOU SHOULD RECEIVE 3 PAGE(S), INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL (518) 458-1313.

cc:
J. Moran, Esq. (ANC)
R. Gere (ANC)
E. Rawlings (ANC)
J. Kessler (HSA)
R. Creps (PES)
S. Krival (DTSC)
R. Williams (Kmart)
D. Bruegel, Esq. (Dickinson, Wright)
R. Arulananthum (SFBRWQCB)
S. Arigala (SFBRWQCB)
B. Chan (ACDEH)

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12 Metro Park Road
Albany, NY 12205

Phone 518.459.1313
Fax 518.459.2472

July 17, 1995

Daniel F. Murphy
Supervising Hazardous Substances Engineer I
Cal-EPA, DTSC, Region 2
700 Heinz Avenue, Suite 200
Berkeley, California 94502

RE: Former American National Can Company Facility
Oakland, California
EPA ID# 009 162 116

Dear Mr. Murphy:

In a letter dated June 21, 1995, DTSC requested the submittal of a consolidated results report by July 15, 1995. The purpose of this letter is to request an extension to that deadline. The Consent Order that permitted the removal of RCRA wastes from the Temporary Storage Area for off-site disposal also required the collection and analysis of post-removal soil samples. We propose that the consolidated results report be expanded to include the Temporary Storage Area sampling results. The complete results report will be submitted by July 27, 1995.

Please contact Walter Howard at (518) 437-8387 if you have any questions regarding this proposed schedule extension and change in report scope.

Sincerely,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

cc: J. Moran, Esq., ANC
R. Gere, ANC
E. Rawlings, ANC
J. Kessler, HSA
R. Creps, PES
R. Williams, Kmart
D. Bruegel, Esq., Dickinson, Wright
R. Arulananthum, SFBRWQCB
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July 17, 1995

Daniel F. Murphy
Supervising Hazardous Substances Engineer I
Cal-EPA, DTSC, Region 2
700 Heinz Avenue, Suite 200
Berkeley, California 94502

RE: Former American National Can Company Facility
Oakland, California
EPA ID# 009 162 116

Dear Mr. Murphy:

Following discussions with Steve Krival of your staff concerning your letter of July 13, 1995, we understand that the statistical analysis required to be performed on the post-removal samples recently collected from the Temporary Storage Area is to be modified in the following manner. The single mean 't' test specified in your June 13, 1995, letter will be replaced by the calculation of the mean of the concentration of each analyte detected. That mean will be compared to the applicable DTSC Performance Standard, as follows.

The statistical analysis of the means will be performed using all samples collected from the temporary storage area as well as for individual functional areas A, B and D. It will not be performed individually for functional Area C, because of the limited sample population (two samples) available there. If any analyte mean exceeds the applicable DTSC Performance Standard for that analyte by more than 2 standard deviations (95% confidence interval), then the applicable area will be subject to additional sampling as was originally specified in the June 13, 1995, letter.

Please contact Walter Howard at (518) 437-8387 if you have any questions regarding this modification to the statistical methodology.

Sincerely,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, *Governor*

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

(510) 540-3724

95 JUN 23

June 21, 1995

CERTIFIED MAIL

Ms. Judy Peters
Engineer, Environmental Control
American National Can Company
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631-3542

Dear Ms. Peters:

EXPEDITED SUBMITTAL OF CONSOLIDATED SAMPLE RESULTS, AMERICAN NATIONAL CAN COMPANY, OAKLAND FACILITY DRUM STORAGE AREA & SOLDER DROSS STORAGE AREA, EPA I.D. NO. 009 162 116.

In our letter to you of April 13, 1995 we outlined a schedule for expediting the closure of the title RCRA storage facilities. We further explained to RUST Environment and Infrastructure that this arrangement would specifically allow American National Can Co. to focus on consolidating and completing an expedited results report for our review and approval. Once approved, the results report would be included as an attachment to your closure certification submittal.

Please prepare a consolidated results report for submittal by July 15, 1995. The Temporary Storage Area soil sample results may be submitted at a later date in conjunction with the closure certification submittal.

Include the following in the consolidated results report:

0 A consolidation of all soils and ground water sample results.

0 Detailed geological cross sections for both facilities - the Solder Dross Storage Area (SDSA) and solvent Drum Storage Area (DSA). Include and identify the locations of soil strata with relatively high permeability, such as the "light olive grey silty-sandy clay " in the Drum Storage Area (DSA). This information will be essential for locating ground water monitoring wells under the direction of the Regional Water Quality Control Board. During excavations in the DSA I made the following observations regarding the "light olive grey silty-sandy clay" stratum. It was saturated with solvent. At section C-C′, its vertical extension is 2-2.5′ below grade to at least 2.0′ below the ground water table. Its horizontal extension along C-C′

extends between - and perhaps beyond - PB-4 and HS-11 as well as the downgradient "hydropunch" monitoring well located near HS-11. This detail is not shown in Figure 3a. of your submittal dated February 20, 1995. This solvent saturated stratum also extends continuously for at least 30' along section A-A', but the stratum is not clearly identified in Figure 1. of the February 20, 1995 submittal.

0 Concentration contour maps for each contaminant using all data collected to date.

0 Include separate maps which accurately reflect the location of the ground water table and;

a) delineate the solvent saturated volume of soil (30'x 30'x 12') discovered during excavation of the Drum Storage Area;

b) identify all "hits" consistent with FOO3 wastes.

0 A comprehensive discussion of the results.

Should you have any questions please contact Mr. Steve Krival at 510 540-3959.

Sincerely

Stephen R. Krival, M.S.
Hazardous Substances
Specialist
Department of Toxic Substances Control
Facility Permitting Branch
700 Heinz Avenue, Suite 200
Berkeley, California 94710

Certified Mail No. P 393 789 800

cc: Joseph Moran, Legal Counsel
Engineer, Environmental Control
American National Can Company
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631-3542

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Senior Project manager
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Planner II
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Oakland, CA 94612

Brian Matsumura, Process Coordinator III
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Fax 518 458.2472

July 19, 1995

Daniel F. Murphy
Supervising Hazardous Substances Engineer I
Cal-EPA, DTSC , Region 2
700 Heinz Avenue, Suite 200
Berkeley, California 94502

RE: Former American National Can Company Facility
Oakland, California
EPA ID# 009 162 116

Dear Mr. Murphy:

This letter serves to clarify our July 17, 1995 letter to you which specified the statistical analysis to be performed on post-removal soil samples collected from the Temporary Storage Area. At the request of Steve Krival of your staff, a statistical analysis referenced in "Methods for Evaluating the Attainment of Cleanup Standards", Volume I, Chapter 6, USEPA, 1989 will be used to statistically analyze the samples from the temporary storage area. A excerpt from that document describing this statistical analysis is enclosed.

The statistical analysis will be performed for each analyte of concern and for each functional area as originally specified in the June 13, 1995 letter from DTSC. If any upper confidence limit result exceeds the applicable Performance Standard, then the functional area will be subject to additional sampling as outlined in the June 13, 1995 letter from DTSC.

Sincerely,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

Enclosure

cc: J. Moran, Esq., ANC
R. Gere, ANC
E. Rawlings, ANC
J. Kessler, HSA
R. Creps, PES
S. Krival, DTSC
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D. Bruegel, Esq., Dickinson, Wright
R. Arulananthum, SFBRWQCB
S. Arigala, SFBRWQCB
B. Chan, ACDEH
W. Howard, RUST

The formula for an **upper *one-sided* 100(1-α) percent confidence limit** around the population mean is presented in Box 6.7. The one-sided confidence interval should be used to test whether the site has attained the cleanup standard. The corresponding decision rule is given in section 6.3.4.

Box 6.7
Computing the Upper One-sided Confidence Limit

$$\mu_{U\alpha} = \bar{x} + t_{1-\alpha,df}\frac{s}{\sqrt{n}} \qquad (6.8)$$

where $\bar{x}$ is the computed mean level of contamination, and s is the corresponding standard deviation. The appropriate value of $t_{1-\alpha,df}$ can be obtained from Table A.1.

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If $\mu_{U\alpha} \geq Cs$, conclude that the area is dirty (i.e., $\mu \geq Cs$).

Box 6.8 presents an example of an evaluation of cleanup standard attainment.

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July 17, 1995

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Cal-EPA, DTSC, Region 2
700 Heinz Avenue, Suite 200
Berkeley, California 94502

RE: Former American National Can Company Facility
Oakland, California
EPA ID# 009 162 116

Dear Mr. Murphy:

Following discussions with Steve Krival of your staff concerning your letter of July 13, 1995, we understand that the statistical analysis required to be performed on the post-removal samples recently collected from the Temporary Storage Area is to be modified in the following manner. The single mean 't' test specified in your June 13, 1995, letter will be replaced by the calculation of the mean of the concentration of each analyte detected. That mean will be compared to the applicable DTSC Performance Standard, as follows.

The statistical analysis of the means will be performed using all samples collected from the temporary storage area as well as for individual functional areas A, B and D. It will not be performed individually for functional Area C, because of the limited sample population (two samples) available there. If any analyte mean exceeds the applicable DTSC Performance Standard for that analyte by more than 2 standard deviations (95% confidence interval), then the applicable area will be subject to additional sampling as was originally specified in the June 13, 1995, letter.

Please contact Walter Howard at (518) 437-8387 if you have any questions regarding this modification to the statistical methodology.

Sincerely,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

cc: J. Moran, Esq., ANC
R. Gere, ANC
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W. Howard, RUST

STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
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(510) 540-3724

Barney Chan

June 13, 1995

COPY

CERTIFIED MAIL

Ms. Judy Peters
Engineer, Environmental Control
American National Can Company
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631-3542

Dear Ms. Peters:

NOTICE OF ACCEPTANCE OF DRAFT CLOSURE PLAN, AMERICAN NATIONAL CAN COMPANY, OAKLAND FACILITY DRUM STORAGE AREA & SOLDER DROSS STORAGE AREA, EPA I.D. NO. 009 162 116, May 5, 1995.

The Department of Toxic Substances Control accepts your draft closure plan with the reservations cited herein. We will public notice the plan with attached corrections as an addendum to the draft closure plan. These changes will be included in our final determination. We reviewed your submittal and found it generally in good condition except for the areas we delineate. We take this approach in order expedite the closure process rather than requesting an additional draft closure plan submittal from you.

Should you have any questions please contact Mr. Krival at 510 540-3959.

Sincerely

D. F. Murphy

Daniel F. Murphy
Supervising Hazardous Substances
Engineer I
Senior Waste Management Engineer
Facility Permitting Branch
Department of Toxic Substances Control
Facility Permitting Branch
700 Heinz Avenue, Suite 200
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Certified Mail No. P 393 789 797

cc: Joseph Moran, Legal Counsel
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Office of Planning and Building
1330 Broadway, 2nd Floor,
Oakland, CA 94612

ATTACHMENT A

KEY
Statements in quotations are extracted directly from your draft closure plan submittal, " ".

Deletions from your draft closure plan are denoted by line out, "-".

DTSC insertions are denoted in *italics*.

CORRECTIONS TO DRAFT CLOSURE PLAN
B. First Soil Sampling Plan, 2. Sample Results, a. Solder Dross Storage Area, page 16, paragraph 3:

"These soil analytical results indicate ~~that there have been no significant impacts~~ *the release of hazardous waste* ~~impact~~ from site operations to the Solder Dross Storage Area concrete pad and underlying soils. ~~However,~~ the significance of ~~the~~ elevated total chromium *,organo-lead, and hydrocarbon* results ~~and the elevated reporting limit for organo-lead analyses~~ will be assessed further during subsequent sampling."

B. First Soil Sampling Plan, 2. Sample Results, b. Drum Storage Area, page 17. Add new paragraph 2:

Analytical results from samples retrieved from two bore holes at the solvent Drum Storage Area (DSA) indicate that RCRA FOO3 listed wastes were released from site operations contaminating underlying soils. Bore hole PB-4 is centrally located in the DSA, and PB-3 is located 20 feet downgradient to PB-4 near the south-east boundary of the DSA.

First Soil Sampling Plan, 2. Sample Results, b. Drum Storage Area, page 17, edit paragraph 2:

~~Benzene, toluene,ethylbenzene and xylenes were detected in sample PB-3.1(table 7). The results for toluene,ethylbenzene, and xylenes exceeded the linear range of the analytical instrument. Elevated toluene, ethylbenzene and xylenes were detected in some of the other shallow soil samples and in sample PB-3.2. collected at a depth of 4 - 5 feet below grade.~~

Aromatic hydrocarbons were detected in excess of the DTSC performance standard of 1 mg/kg in both PB-4 and PB-3. In PB-4 TPH gasoline was detected at 2.1 mg/kg, 1-2 feet below grade. In PB-3 EPA Method 8270 Open Scan was used to detect aromatic hydrocarbons in excess of performance standards at 1-2 feet and 4.5-5.5 feet below grade(Table 7). The PB-3 sample at 1-2 feet

below grade exceeded the linear range of the analytical instrument for total xylenes (4.4 mg/kg) and ethylbenzene (0.77 mg/kg). Benzene and toluene was also detected in this sample. ~~"Occasional low concentrations (less than 30 ppb) of~~ xylenes and toluene were detected in some of the intermediate depth samples *at concentrations of 30 ug/kg."* ~~Xylenes were detected at concentrations that exceeded the DTSC performance standard of 1 mg/kg, in samples PB-3.1 and PB-3.2.~~

"Acetone, methylene chloride, and several tentatively identified compounds (TICs) were reported. ~~"However, these all appear to be laboratory contaminants.~~ *These compounds appear in laboratory blanks indicating that they are laboratory contaminants."*

Add paragraph:

Total Petroleum Hydrocarbon concentrations are reported in excess of the DTSC performance standard of 10 mg/kg in the same bore holes where aromatic hydrocarbons are detected; PB-3 and PB-4. Total Petroleum Hydrocarbon (TPH) concentrations in PB-3 are 6500 mg/kg TPH diesel at 1-2 feet below grade, and 1000 mg/kg TPH diesel 4.5-5.5 feet blg. TPH Mineral Spirits is reported at 260 mg/kg 4.5-5.5 feet below grade (blg). In PB-4, TPH diesel is reported as 100 mg/kg at 1-2 feet blg.

B. First Soil Sampling Plan, 2. Sample Results, b. Drum Storage Area, page 18, paragraph 2.

~~Background soils concentrations of total lead, total chromium and total zinc were statistically lower than the concentrations detected in some of the soil samples beneath the two RCRA storage area.~~

The DTSC performed a two-mean t-test on several inorganic compounds: total lead, total chromium, and total zinc. They compared site background soils with soils from beneath the two RCRA storage units. In each case, inorganic concentrations beneath the SDA and DSA were significantly greater than background concentrations.

G. Design and Construction of Temporary Storage Area, pages 28 and 29.

1. ~~"Characteristic~~ *Soil that is RCRA Listed* hazardous waste ~~soil~~ will be placed into water tight roll-off bins." *Due to the mixture rule, all soil removed from the DSA is RCRA F Listed hazardous waste. Soils removed from the SDSA is RCRA Characteristic hazardous waste.*

"Concrete ~~and soil~~ exceeding DTSC performance standards will be maintained in a lined containment cell constructed

"I. Sampling Plan - Temporary Storage Area"

The submitted sampling plan for the Temporary Storage Area is incomplete. Soils in the Temporary Storage Area are subject to hazardous waste releases to the air and soil. Soils hazardous wastes are not contained according to CCR Title 22. Partial covering of soils with plastic allows vapors to be released to the air, and results in rainwater intrusion directly into stored hazardous wastes. Inadequate berming has resulted in rainwater run-off. Because containment of soils is inadequate the Department has developed the following sampling plan which the owner must implement in order to demonstrate significant contaminant releases to soils has not occurred.

Replace I.1. Sample Design and I.2 Objectives, and modify I.3 Proposed Methods, Equipment and Material as follows:

Objective: Subsequent to the removal of all stored hazardous waste and non-hazardous waste, determine if releases from stored hazardous wastes in the Temporary Storage Area exceed DTSC Performance Standards.

Analytical Methods and Performance Standards:
Refer to Attachment C, "Closure Performance Standards, Temporary Storage Area, American Nationanl Can Facility - Oakland".

The Temporary Storage Area is divided into four functional areas and simple random sampling is applied to each area:

Area A: The "Lined Containment Cell"
Area B: The Boundary area.
Area C: The 55-gallon drum hazardous waste area.
Area D: The Roll-Off Bin Storage area.

The Temporary Storage Area is divided into a grid consisting of 10 x 10 feet squares. A random generator is used to select 5 samples from each area A, B, and D. Two samples are randomly selected from area C. See Attachment B - draft closure plan Figure 10 re-worked.

Area A: A5, A13, A21, A26, A28
Area B: B2, B6, B13, B22, B19
Area C: C4, C6
Area D: D15, D18, D25, D29, D32

A single split sample from each area (A,B,C,D) shall be analyzed by a second, independent, DTSC HML certified laboratory.

All samples shall be retrieved at 6"-8" below grade.

Sample data shall be digested as follows:

Sample data shall be digested as follows:

Use a single mean t test: t = X - Ux/SEM. Where X = mean of sample concentrations for one analyte, Ux = DTSC health based performance standard for the same analyte, SEM = Standard Error Measurement. Formulate a directional hypothesis since we are only concerned about whether the mean concentration is greater than the health based performance standard. H1: U actual > health based performance standard. Set P = .10

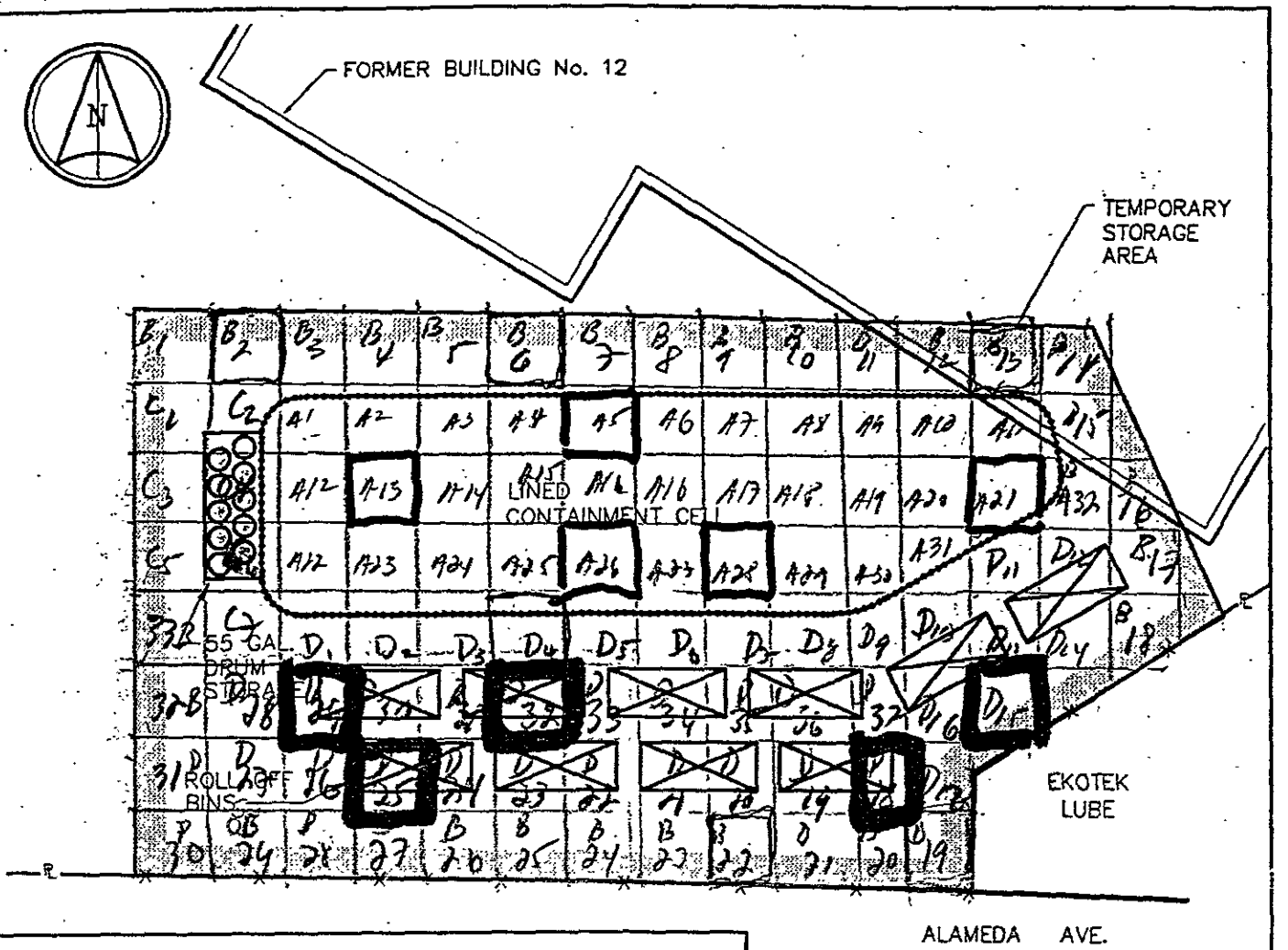
For each analyte detected perform a single mean t-test using all samples retrieved in the Temporary Storage Area.

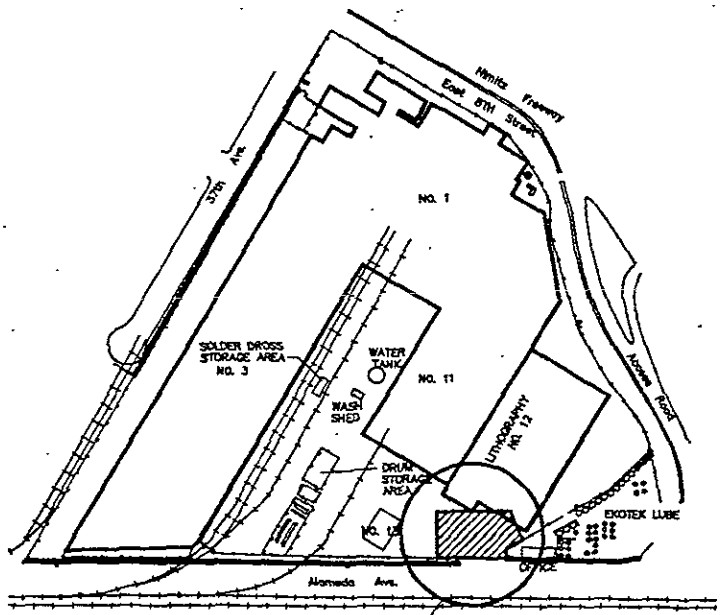
For each analyte detected perform four single mean t-tests using all samples retrieved in each functional area within the temporary storage area - A,B,C, and D.

If t (the test statistic) is significantly greater than a performance standard for an analyte, then the Temporary Storage Area, or a functional area within the Temporary Storage Area, is subject to additional sampling at a depth which takes into account the permeability of underlying soils. Additional sampling and removal of contaminated soils will take place in accordance with the excavation plan for the DSA and SDA.

Any single sample in excess of a DTSC performance standard shall be identified, and at least two additional analyses shall be conducted in soils adjacent to the retrieved sample, unless otherwise directed in writing by DTSC.

ATTACHMENT B





TEMPORARY STORAGE AREA
SEE DETAIL ABOVE

SCALE IN FEET
0
400
800

RUST ENVIRONMENT & INFRASTRUCTURE

MAP OF TEMPORARY STORAGE AREA
LOCATION AND LAYOUT
AMERICAN NATIONAL CAN CO.
FORMER OAKLAND, CALIFORNIA FACILITY

TOWN OF OAKLAND — ALAMEDA COUNTY, CA

PROJECT NO. 35195.108	DATE 05/13/95	DWG. NO. 3519521B	SCALE AS SHOWN	FIGURE NO. 10

ATTACHMENT C

Closure Performance Standards
Temporary Storage Area, American National Can Facility - Oakland

Analyses of Concern for Soil Samples	Health Based Performance Standard
Total lead EPA Method 6010	Clean Closure: 300 mg/kg Deed restriction & Non-residential use: 300-850 mg/kg
Total Zinc EPA Method 6010	Clean Closure: 17,000 mg/kg
Hexavalent Chromium EPA Methods 3060A(Digestion) + 7196A	PQL: < 0.25 mg/kg
Semivolatile Organic Compounds EPA Method 8270 Open Scan	1.0 mg/kg
Volatile Organic Compounds EPA Method 8240	1.0 mg/kg
LUFT MANUAL METHODS	
Organolead	PQL: < 0.5 mg/kg
TPH-Diesel	10 mg/kg
TPH-Mineral Spirits	10 mg/kg

RUST ENVIRONMENT & INFRASTRUCTURE

RUST Environment & Infrastructure Inc
12 Metro Park Road
Albany, NY 12205
Tel. (518) 458-1313 • FAX (518) 458-2472

May 23, 1995

Reviewed 5/25/95

Mr. Barney Chan
Hazardous Materials Specialist
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway
Room 250
Alameda, California 94502

Re: Area 2
Former American National Can Company Facility
Oakland, California

Dear Mr. Chan:

Enclosed please find a copy of our Area 2 Remediation Activities Report for the referenced site.

If based on the information provided in this document, you agree that the impacted soil in this area has been remediated to the satisfaction of the Alameda County Department of Environmental Health, please indicate your agency's approved closure in a letter to my attention.

If you have any questions regarding this report, please contact me at (518) 458-1313.

Very truly yours,

Walter O. Howard/for

Edward W. Alusow
Senior Project Manager

Enclosure

c: J. Moran (ANC)
R. Gere (ANC)
E. Rawlings (ANC)
J. Kessler (HSA)
D. Bruegel (Dickinson Wright)
R. Creps (PES)
R. Arulananthum (SFBRWQCB)
R. Williams (KMART)
S. Arigala (SFBRWQCB)

DUNN CORPORATION
Engineers, Geologists, Environmental Scientists
12 Metro Park Road
Albany, New York 12205
Tel: 518/458-1313
Fax: 518/458-2472

April 27, 1992

Mr. Dennis Byrne
Department of Environmental Health
80 Swan Way, Room 200
Oakland, California 94621

Post-it™ brand fax transmittal memo 7871 | # of pages > 4

To Mr. DENNIS BYRNE	From WALT HOWARD
Co.	Co. DUNN CORPORATION
Dept.	Phone # (518) 458-8931
Fax # (510) 569-4757	Fax # (518) 459-7053

Dear Mr. Byrne:

Subject: American National Can Company
3801 East 8th Street, Oakland, California

As part of the subsurface investigation completed at the subject site over the past year, Dunn Corporation (DUNN) has completed four quarterly rounds of ground water sampling and performed additional investigations in areas of concern. With the pending submission (May, 1992) of a Subsurface Investigation Summary Report (SISR) to the Department of Environmental Health (DEH), DUNN has completed its investigation of the 5 areas of concern at the site.

At this time, DUNN is proposing to implement a site ground water monitoring plan for the upcoming year beginning May 1, 1992. Based on the information gathered over the past year, DUNN has developed a ground water monitoring plan which will provide for effective monitoring of the extent and concentration of impacted ground water, while providing some warranted economic relief to the American National Can Company (ANCC). The following sections provide details of DUNN's proposed revised plan for each of the 5 areas of the site.

AREA 1

Dennis must have okayed discontinuing monitoring

There are presently 2 wells (MW-12 and GW-5) in Area 1. The four rounds of monitoring of well MW-12 and two rounds of well GW-5 revealed no detectable concentrations of TPH as gasoline (TPHg) or BTEX. Considering the analytical results to date, DUNN proposes to discontinue all ground water monitoring in Area 1.

AREA 2

was BTEX ever run & okayed for discontinuing at least one BTEX oct 91 ND

There are presently six (6) wells in Area 2 (GW-6, MW-13, MW-15, TW-1, MW-17 and MW-21). Wells GW-6 and TW-1 are located directly downgradient from the abandoned heating oil UST. Well MW-21, recently installed inside the plant, is located further downgradient from the UST.

Based on the ground water flow regime in Area 2, and on the analytical results from the past year of monitoring, DUNN proposes to sample wells TW-1 and MW-21 as part of the revised quarterly ground water monitoring plan. The samples collected from these wells will be analyzed for TPH as diesel (TPHd) by EPA Method 3510 and field filtered metals, nickel and zinc.

Not analyzed on 5/92

12/92 - 4.6 mm TPHd TW-1 & ND MW-21 downgradient

EH 0001016

AREA 3

There are presently 12 wells in Area 3. The extensive sampling performed in Area 3 over the last year has shown that ground water, particularly between ANCC Building No. 12 and the ANCC/EKOTEK Lube property line is contaminated with petroleum hydrocarbons, chlorinated organic compounds and PCBs.

Ground water contour maps prepared from each quarterly round of monitoring reveal the presence of a ground water mound at the ANCC/Ekotek Lube property line. Ground water flows onto the ANCC's property in a radial pattern from the mound with flow to the northeast, north, west and southwest. The mound lies within the regional ground water system that has a flow direction to the south-southeast; consequently, a ground water trough exists beneath the ANCC's property. The axis of this trough represents low groundwater elevations between the two opposing flow directions. The trough also represents the boundary along which ground water flowing from the mound is redirected by the regional component of ground water flow around the perimeter of the mound. Ground water flows parallel with, but not across, the trough and therefore the trough represents a hydraulic barrier. As a result, the axis of the trough represents the furthest extent onto ANCC property of the flow of contaminants identified near the ANCC/Ekotek Lube property. This ground water flow regime is most clearly depicted on the two most recently submitted ground water contour maps (Plates 6 and 9).

Seem to be alternative monitoring MW 18 / 20 ? TPHg + BTEX ? Why was toluene deleted from MW's?

Ground water elevation and analytical data collected over the past year indicate that the axis of the trough extends in an arcuate pattern from near well MW-1, beneath Building #12, to near well GW-2. Ground water along the axis near MW-1 flows in a northeast direction around the northern perimeter of the mound while ground water along the axis near well GW-2 flows in a southerly direction around the western perimeter of the mound. Therefore, these wells represent the furthest on-site downgradient monitoring points for ground water flowing from the mound, before it flows off-site.

Based upon analytical results and ground water flow patterns obtained during the past year, DUNN is proposing to revise the Area 3 monitoring plan. In order to effectively monitor contaminated ground water flowing westward into the trough from the ANCC/EKOTEK Lube property line, DUNN proposes to sample wells MW-1, MW-19 and GW-2. DUNN proposes to analyze these samples for volatile organic compounds (VOCs), semi-VOCs, PCBs, and TPH as diesel. In order to monitor ground water flowing into the trough from the west/northwest, DUNN proposes to sample wells MW-6, MW-18, MW-20 and MW-7. DUNN proposes to analyze these samples for VOCs, TPH as diesel and PCBs. The sampling of wells, GW-2 and MW-1 will provide a means for effective monitoring of ground water flowing off-site.

AREA 4

These are presently six wells (MW-8, MW-9, MW-10, MW-14, MW-16 and GW-3) in Area 4. Elevated concentrations of toluene, ethylbenzene, xylenes and TPH as gasoline are present in ground water collected near well GW-3. Based on the analytical data reported for other wells in Area 4, specifically MW-14, MW-16, and MW-9, the impacted ground water near GW-3 is limited in lateral extent.

Ground water contour maps prepared from the last two rounds of monitoring (October, 1991 and February, 1992) indicate that well MW-14 is directly downgradient from GW-3. DUNN, therefore, proposes to sample MW-14 as part of this revised ground water

monitoring plan. This well will be sampled for VOCs and TPHg. In addition, well MW-8 will again be sampled to monitor for potential migration of Area 3 contaminants. This well will be sampled for VOCs, TPH as diesel and PCBs.

AREA 5

There are presently 2 wells in Area 5 (MW-11 and GW-4). DUNN discontinued the sampling of well GW-4, with DEH approval, following the second round of sampling (July, 1991). Analytical results from MW-11 have revealed consistently low (≤5 ppb) estimated concentrations of tetrachloroethene. The February, 1992, quarterly round of sampling also revealed an estimated concentration of 1,2-dichlorobenzene. The reported concentrations of tetrachloroethene are equal to or less than both the USEPA and the California Department of Health Care Services maximum contaminant levels for drinking water, and the recently reported concentration of 1,2-dichlorobenzene is much below the USEPA MCL. As a result, ground water impact in this are of the site appears to be negligible. Therefore, DUNN proposes to discontinue all future sampling in Area 5.

Dunn's okay'd discontinuance of monitoring

SUMMARY

The attached Table 1 provides a summary of DUNN's proposed revised ground water monitoring plan as described in the previous sections. DUNN intends to continue water level and product thickness monitoring of all wells at the site on a quarterly basis. DUNN will submit ground water contour maps with the results of quarterly sampling to the DEH. If approved, DUNN intends to initiate this plan by conducting the first round of monitoring during the week of May 4, 1992. Three subsequent rounds of monitoring will be completed on a quarterly basis over the remainder of the year.

DUNN would appreciate your timely review of this plan so that the plan can be implemented during the upcoming round of sampling. Should you have any questions regarding this proposed plan, please contact me at (518) 458-6931.

Sincerely,

DUNN CORPORATION

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

EWA:WOH/ce

attachment

cc: J. Moran, ANCC
J. Peters, ANCC
E. So, RWQCB

TABLE 1

AMERICAN NATIONAL CAN COMPANY
Oakland, California, Facility

Proposed 1992/1993 Ground Water Monitoring Plan

Area	Well Number	Proposed Analysis	Method
1	No Sampling		
2	MW-21, TW-1 SCC ND 2/92	TPHd Filtered Metals (Ni, Zn)	(3510) (6010)
3	MW-1, MW-19, GW-2	VOC's Semi-VOC's PCB's TPHd	(8240) (8270) (8080) (3510)
	MW-6, MW-7, MW-18, MW-20	VOC's TPHd PCB's	(8240) (3510) (8080)
4	MW-14	BTEX TPHg	(8020) (8015/5030)
	MW-8	VOC's TPHd PCB's	(8240) (3510) (8080)
5	No Sampling		

Oct 13, 95

GABRIEL DEVELOPMENT

NICHOLAS GABRIEL, JR.
DEVELOPMENT CONSULTANT
P.O. BOX 464, GLENDORA, CA 91740

(909) 946-2505
FAX: 931-9217

FAX TRANSMITTAL

DATE: April 24, 1995

RE: Super Kmart Center #4944
Oakland, CA
Meeting Scheduled for May 9, 1995

PAGES TO FOLLOW: 2

FAXED TO ATTENDEES:	**FAX NUMBERS:**
Mayor Elihu M. Harris	(510) 238-2227
Ignacio De La Fuente, Councilmen	(510) 238-6129
Jim Reinhart, City of Oakland	(510) 238-3691
Kay Winer, City of Oakland	(510) 238-3586
Craig Kocian, City Manager ✓	(510) 238-2223
Jeff Chew, City of Oakland ✓	(510) 238-3691
Mark Wald, City of Oakland	(510) 238-6500
Brian P. Matsumura, City of Oakland	(510) 238-3882
Joseph Samuels, Chief of Police	(510) 238-3365
Lamont Ewell, Fire Chief	(510) 238-3856
Jayne Williams, City Attorney	(510) 238-6500
Donnell Choy, Deputy City Attorney	(510) 238-6500
Andrew Clark-Clough, Public Works	(510) 238-7286
Robert S. Creps, PES Environmental, Inc.	(415) 899-1601
Richard G. Williams, Kmart Corporation ✓	(810) 637-4417
Scott Wilson, Kmart Corporation ✓	(916) 334-8563
David Bruegel, Dickinson, Wright, et al ✓	(810) 433-7274
Sum Arigala, RWQCB	(510) 286-1380
Ravi Arulanantham, RWQCB	(510) 286-1380
Helen P. Loreto, McDonald Corporation	(408) 922-0649
Gabriel Tierney, McDonald Corporation	(408) 922-0649
Barney Chan, ACDEH ✓	(510) 337-9335
James Kessler, The Martin Group ✓	(415) 772-5911
Joseph S. Moran, American National Can ✓	(312) 399-3527
Gilbert Jensen, District Attorney ✓	(510) 569-0505

+ Tpeacock.

April 24, 1995

LETTER TO ALL INVITEES (Hard copy to follow)

RE: Super Kmart Center #4944 - Oakland, CA

Kmart Corporation has asked that I contact you to request your participation at a meeting at **10:00 AM on Tuesday, May 9, 1995** at the location of their new Super Kmart Center in Oakland. Hosting this meeting will be Mr. Richard G. Williams, the Senior Manager of Real Estate Development for Kmart Corporation. Also in attendance will be representatives of the Martin Group, McDonalds and American National Can Company. These firms are concerned about the potential environmental impact to the Kmart and McDonald's developments and to the neighborhood which seems to be negatively affected by the abandoned EKOTEK facility.

The EKOTEK facility is located adjacent to Kmart's property at the intersection of Alameda Avenue and E. 8th Street. We believe that this facility may be adversely impacting the ground and ground water; it certainly is an eye-sore and may be a public safety concern. Kmart is hopeful that the city and county agencies and community leaders may find methods of co-operative efforts to cause an immediate demolition and clean-up of the EKOTEK facility.

EKOTEK is located at the Alameda Avenue off ramp and seems no appropriate "landmark" to designate the "gateway" to Oakland's targeted redevelopment and enterprise area efforts.

Mr. Williams and his consultants have prepared a concise presentation of the environmental regulatory issues concerning EKOTEK and will update you also about Kmart's and McDonalds' construction schedules..

Your participation will be vital to a successful discussion. We hope to see you at our meeting at the Kmart construction site.

Please RSVP by phone to me at (909) 946-2505.

Very truly yours,

GABRIEL DEVELOPMENT

Nicholas Gabriel
Developer Consultant

Att/Agenda

AGENDA FOR SUPER KMART MEETIN

Brad Shipley
Federal On-Scene Coordinator
EPA
(415) 744-2292
William Lewis

TUESDAY , MAY 9, 1995 (10:00 AM)

ATTENDEES:

Mayor Elihu M. Harris
Ignacio De La Fuente, Councilmen
Jim Reinhart, City of Oakland
Kay Winer, City of Oakland
Jeff Chew, City of Oakland
Mark Wald, City of Oakland
Brian P Matsumura, City of Oakland
Lamont Ewell, Fire Chief
Joseph Samuels, Chief of Police
Craig Kocian, City Manager
Jayne Williams, City Attorney
Donnell Choy, Deputy City Attorney
Andrew Clark-Clough, Public Works
Gilbert Jensen, District Attorney

Richard G. Williams, Kmart Corpora
Scott Wilson, Kmart Corporation
David Bruegel, Dickinson, Wright
Sum Arigala, RWQCB
Ravi Arulanantham, RWQCB
Helen P. Loreto, McDonald Corp
Gabriel Tierney, McDonald Corp
Barney Chan, ACDEH
Robert S. Creps, PES Environmenta
Nicholas Gabriel, Gabriel Development
James M. Kessler, The Martin Group
Joseph S. Moran, American National Can

All attendees should make every effort to be on site promptly at 10:00 AM.

1. Richard G. Williams, Kmart Corporation's Senior Manager for Real Estate Development, will conduct a walking tour of exterior boundaries of EKOTEK facility to view environmental issues and public safety concerns. Meeting will then move to the Kmart conference room on-site.

2. Attendees will be introduced. An overview of the Super Kmart Center and McDonalds development will be presented as well as discussion of environmental issues presented by the EKOTEK parcel.

3. Robert Creps, Principal Engineer, PES Environmental, Inc. will present an overview of the environmental impact of EKOTEK and an assessment of the current regulatory status and corrective measures to be taken.

4. Concluding comments by:

   James M. Kessler, Executive Vice President, The Martin Group
   Joseph S. Moran, American National Can Company
   Helen P. Loreto, Project Manager, McDonalds Corporation
   Jeffrey Chew, Senior Project Manager, Office of Economic Development and Employment, City of Oakland and representatives of the California Regional Water Quality Control Board.

QUESTIONS & ANSWERS BY ALL PARTICIPANTS

MEETING TO ADJOURN

NOTE: **If you wish to arrive a few minutes early there will be refreshments available at the trailer conference room which will be parked on-site.**

GABRIEL DEVELOPMENT
P.O. BOX 464
GLENDORA, CA 91740

INDUSTRY CA
PM
25 APR
1995

Old Glory
USA
For U.S. addresses only

MR. BARNEY CHAN
ACDEH
1131 HARBOR BAY PARKWAY, #250
ALAMEDA, CA 94502

STATE OF CALIFORNIA -- ENVIRONMENTAL PROTECTION AGENCY PETE WILSON, Governor

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

510 540-3734

MEMORANDUM

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 3

To Barney Chan	From Sum Arigala
Co. ACE Ed	Co. RWQCB
Dept. 337 9335	Phone # 286 0434
Fax #	Fax # 286 1350

To: Sum Arigala, Chemical Engineer,
Region 2
San Francisco Bay Area Water Board

From: Steve Krival, M.S., HSS
Facilities Permitting Branch, Region 2
Department of Toxic Substances Control

Date: April 19, 1995

SUBJECT: AMERICAN NATIONAL CAN-OAKLAND, GROUND WATER INVESTIGATION

This memorandum pertains to American National Can -Oakland, Draft Final Closure Plan, Section 6. Groundwater Investigation, dated January 1995. Comments herein are mine, as well as those of a staff geologist, whose independent review was approved by Senior Supervising Engineering Geologist, Michael Finch.

In your 3/9/95 letter to us the Regional Water Board agreed to take responsibility for ground water investigations at the two RCRA facilities at American national Can - Oakland, and several weeks ago you invited me to meet with you and comment on the proposed ground water investigations at the Solder Dross Storage Area and Drum Storage Area RCRA facility closures at American National Can - Oakland. We would like to meet with you, and a Water Board geologist who is familiar with the draft Non-Attainment of Ground Water Cleanup Levels policy as soon as possible. Please call me at 540-3959 to arrange a meeting.

On Sunday, February 26, 1995, I observed solvent/hydrocarbon contaminated soils being excavated from beneath and down-gradient to the RCRA Drum Storage Area containment structure at the facility.

The approximate dimensions of the excavation in soils were 30' X 20' - horizontal & 10' feet -vertical.

The top two feet was black clay of fairly uniform thickness. That layer was underlaid by a brown gravely-clay of variable thickness (2-4 feet), which in turn was underlaid by a uniform green silty-gravel of at least 5 feet in depth continuing into and below the water table.

When the back-hoe breached the green silty-clay, a strong odor of solvents wafted up from the excavation. The order persisted through out the excavation process.

With the exception of a vertical column visible in an upper layer, the plume appeared confined to the green silty-gravel layer (Please refer to photo).

No samples using EPA methods for volatile and semi-volatile hydrocarbons were taken in the green silty-gravel . However, these soils are currently stored on-site in roll-off bins in the temporary storage area. Additionally, no samples of the contaminated ground water were retrieved. As such, chemical analyses have not been completed and we have no knowledge of the extent of the plume in ground water.

Section 6, Groundwater Investigations, Draft Final Closure Plan, January 1995, does not comply with DTSC requirements for groundwater investigations applicable to American National Can RCRA facility. Neither does it adhere to Ground Water Basin Plan Amendments adopted August 17, 1994 for Non-Attainment of Ground Water Cleanup Levels. We list the following regulations and guidelines for your consideration, which is minimally what we would require to prepare an acceptable work plan for the groundwater investigation for this closure:

1. California Code of Regulations, Title 22, Chapter 14, Article 6.

2. California Code of Regulations, Title 23, Chapter 15, Article 5.

3. Guidelines for Hydrogeologic Characterization of Hazardous Substances Release Sites (DTSC 1994).

4. Monitoring Well Design and Construction for Hydrogeologic Characterization (DTSC 1994).

5. Water Well Standards: State of California, Department of Water Resources, Bulletin 74-81, December 1981.

Additionally, the following wells are required (pursuant to document No. 3 above):

- at least one up-gradient monitoring well to provide background water quality,

- sufficient number of monitoring wells to identify the distribution of contaminant concentrations, (A well is needed in the vicinity of PB 3 where Steve Krival noted a greenish silty gravel saturated with solvents/hydrocarbons. The well should be

screened within this zone and well screen length should be no longer than ten feet.),

- wells at either side of the plume to define the lateral extent of contamination,

- one or more wells at the down-gradient edge of the plume to monitor its migration,

- one or more well clusters in a contaminated water-bearing zone to identify the vertical extent of contamination, and

- one or more wells in underlying water bearing zones to identify the presence or absence of contamination.

STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY PETE WILSON, *Governor*

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

(510) 540-3734

April 13, 1995

CERTIFIED MAIL

Edward Alusow
Senior Project Manager
RUST Environmental & Infrastructure
12 Metro Park Road
Albany, New York 12205

Dear Mr. Alusow:

REVISED CLOSURE PLAN TECHNICAL REVIEW, AMERICAN NATIONAL CAN COMPANY, OAKLAND RCRA FACILITY, DRUM STORAGE AREA, SOLDER DROSS STORAGE AREAS. EPA I.D NO. CAD 009 162 116

This letter is a response to your request for guidance for producing an acceptable Draft Closure Plan. In March of 1995 DTSC offered the aforementioned parties several options to expedite the closure of the title storage facilities: a) Department of Toxic Substances (DTSC) review of a corrected and consolidated Draft Closure Plan; b) DTSC review and comment on draft closure plan submittals dated January, and February, 1995 prior to your submittal of a corrected and consolidated Draft Closure Plan; or c) to work with you on a daily basis until an acceptable Draft Closure Plan was produced. You selected option (b).

This letter also delineates the remaining steps you must complete in order to obtain Closure Certification Approval. Please refer to the DTSC, Permit Writer Instructions for Closure and Treatment Facilities for elaboration of steps referenced in this letter. State regulations and laws must also be followed: The California Code of Regulations (CCR), Title 22; and the State of California Health and Safety Codes.

STEP 5: (page 3, in the Permit Writer Instructions For Closure Of Storage and Treatment Facilities.)

April 30, 1995: Re-submit The Draft Closure Plan to DTSC for approval. Consolidate all prior work pertaining to the Draft Closure Plan in to one loose-leaf binder titled "Draft Closure Plan for Two RCRA Storage Facilities at American National Can -

Oakland, The Solder Dross Storage Area and Drum Storage Area."

The draft closure plan shall include a complete table of contents. It shall also include and adhere to Enclosure 1, Closure Plan Outline for characterizing the vertical and horizontal extent of release(s) of hazardous constituents from the regulated units/excavating structures and soils/and temporary on-site storage and offsite removal of soils. It will not be necessary to include laboratory data, results, or discussions of results in the draft closure plan: they are to be included in the Closure Certification Report. However, we recommend that you include the results from the initial sampling plan in the draft closure plan so the reader understands why it is necessary to devise a plan for the temporary on-site storage of hazardous wastes.

[1]Enclosures 2 and 3 contain the permit writers hand-written notes and redlining for the "Draft Final Closure Plan American National Company Oakland Plant, 3801 East 8th Street Oakland, CA, January 1995" and "Excavation and Sampling Plan Supplement to Draft Final Closure Plan Former American National Can Company Facility Oakland CA February, 1994", respectively. Utilize these notes to write the "Draft Closure Plan for Two RCRA Storage Facilities at American National Can - Oakland, The Solder Dross Storage Area and Drum Storage Area" due April 30, 1995.

The Owner/Operator should understand that Hazardous waste criteria are necessary for determining what regulations must be followed for temporary on-site storage, offsite transportation, and disposal of contaminated soils and containment structures:

a) Temporary Storage: The Drum Storage Area contained RCRA wastes pursuant to Title 22 of the California Code of Regulations (CCR), Article 4., 66261.31 Listed Hazardous Waste From Non-Specific Sources, and Article 3. Characteristic wastes. All hazardous wastes in the Temporary Storage Area shall be contained pursuant to Title 22, CCR, 66260.10 Definitions, and maintained according to 66262.34 Accumulation Time, and 66264.14 Security.

b) Offsite Transportation: Your closure plan must detail the mode of transportation, specific route of transportation, number of loads, final destination(s), and distances to final destinations of disposal.

c) Disposal: RCRA listed wastes shall be disposed at a Class

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[1]Due to the extensive number of pages, enclosures 2 and 3 are not included cc's of this letter. However, they are available on file at the letter-head address.

I landfill. The concrete structure (80 cubic yards) and contaminated soils (694 cubic yards) from the Solvent Drum Area are RCRA listed wastes. Hazardous wastes from the Solder Dross Storage Area - 40 cubic yards of concrete and 4 cubic yards of soils - are RCRA hazardous wastes by characteristic pursuant to CCR Title 22, Article 3. Characteristics of Hazardous Waste.

DTSC will review and comment on the Draft Closure Plan in an expeditious manner. If approval of the Draft Closure Plan requires a substantial re-write you will be notified. If your submittal is received by April 30, 1995 and is acceptable we will proceed on the following schedule:

STEP 6: **May 31, 1995.** Approved Draft Closure Plan and Draft Negative Declaration issued for public review by DTSC.

STEP 7: **July 7, 1995.** DTSC responds to Public Comments on Draft Closure Plan

STEP 8: **July 14, 1995.** DTSC Final Closure Plan Approval and CEQA Determination

STEP 9: **July, ?? 1995.** RUST E & I Manifest and transports hazardous waste to Class I facility, and implements Sampling Plan of Temporary Storage Area.

STEP 10: **July 30 - September, 1995.** Closure Certification Submittal.

The regulations require that the owner/operator must submit to DTSC by registered mail the certification within 60 days of completion of implementation of the approved closure plan. The final events of the approved closure plan should be removal of all wastes stored in the on-site temporary storage area (after July 14, 1995); DTSC approval of any clean-up associated with the temporary storage area (after July 14, 1995.)

American National Can submits the results of the implemented closure plan. All sample plan analytical results, concentration contour maps, soil stratigraphic maps, and ground water investigations shall be included as tables and maps in the text or appendices. A separate comprehensive discussion of the foregoing shall be included in the text.

It is imperative that you compare analytical results to criteria of concern. Criteria for removal of contaminated soils at this site are DTSC health-based performance standards as set forth in our letter of February 11, 1995. Neither background concentrations nor hazardous waste criteria are standards for soils removal at this site, as such, there is no need to discuss

them in this context.

It is also imperative that all statements and conclusions be adequately justified. Refrain from using unsupported statements of judgement e. g.

> Not: " BTEX components were identified as insignificant"
> But: " Mean and upper confidence limit concentrations of aromatic hydrocarbon X did not exceed DTSC health-based performance standards by EPA method Z ".

Refrain from using statements that clash with what is currently known about the site:

> Not: " A soil sampling and analysis program will be conducted adjacent to the concrete pads in order to confirm the absence of contamination".
> But: " An authoritative sampling plan will be conducted adjacent to known areas of soil contamination to determine the vertical and horizontal extent of contamination at the southern boundary of the Drum Storage Area containment structure".

DTSC Reviews sample results. If the Closure Certification submittal is unacceptable and requires substantial work you will be notified that this is the case. However, DTSC will not engage in a redundant detailed review. If the closure certification submittal is acceptable, DTSC will move to Step 11.

STEP 11. Closure Certification Approval

If you have any concerns or questions please call Steve Krival at (510) 540-3959.

Sincerely,

original signed by D Murphy

Daniel F. Murphy
Supervising Hazardous Substances Engineer
Facility Permitting Branch

ENCLOSURE 1
Closure Plan Outline

Date	SDSA/SDA
	Concrete Structure:
11/91	Decontamination Plan Objectives: Design: Proposed Methods, Equipment, and material: Disposal of waste:
/94	**Concrete Structure:** Sampling Plan: Objectives: To test the hypotheses that the concrete structure is not a hazardous waste and does not exceed DTSC health-based performance standards. Sample Design: Simple Random & Authoritative Proposed Methods, Equipment, and material: Temporary Storage of Wastes: Container & Location
/94	**1st Soil Sampling Plan:** Sample Design: Authoritative Objectives: To test the hypothesis that stored wastes were not released to soils at levels exceeding DTSC health-based performance criteria. Proposed Methods, Equipment, and material: Temporary Storage of Wastes: Container & Location
/95	**2nd Soil Sampling Plan SDSA:** Sample Design: Authoritative Objectives: To isolate the vertical and lateral extent of stored wastes released to soils in excess of DTSC health-based performance standards. Proposed Methods, Equipment, and material: Temporary Storage of Wastes: Container & Location
/95	**2nd Soil Sampling Plan DSA:** Sample Design: Authoritative Objectives: To isolate the vertical and lateral extent of stored wastes released to soils which are in excess of DTSC health-based performance standards. Proposed Methods, Equipment, and material: Temporary Storage of Wastes: Container & Location

Cert No.:P-106 353 757

cc:

Mr. Sum Aragala
San Francisco Regional Water
Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

Mr. Joseph Moran, Esq.
Legal Counsel
American National Can Company
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631-3542

Ms. Judy Peters
Engineer, Environmental Control
American National Can Company
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631-3542.

Mr. Richard Burzinski
RUST E & I
P.O. Box 10023
Palo Alto, California 94303

Mr. Robert Creps, P. E.
Principal Engineer
PES Environmental, Inc.
1682 Novato Boulevard, Suite 100
Novato, CA 94947

Mr. James M. Kessler
Senior Vice President
The Martin Group
100 Bush Street, 26th Floor
San Francisco, California 94104

Mr. Richard Williams
Senior Project Manager
Kmart Corporation
International Headquarters
3100 West Big Beaver Road
Troy, MI 48084-3163
Troy, Michigan

/95 **3rd Soil Sampling Plan and Excavation of Soils DSA**
Sample Design: Stratified Random & Authoritative
Objectives: To isolate the vertical and lateral extent of stored wastes released to soils in excess of DTSC health-based performance standards and excavate them.
Proposed Methods, Equipment, and material:
Temporary Storage of Wastes: Container & Location

/95 **3rd Soil Sampling Plan and Excavation of Soils SDSA**
Sample Design: Authoritative
Objectives: To isolate the vertical and lateral extent of stored wastes released to soils in excess of DTSC health-based performance standards and excavate them.
Proposed Methods, Equipment, and material:
Temporary Storage of Wastes: Container & Location

/95 **Initial Ground Water Investigations**
Sample Design: Authoritative
Objectives: To test the hypothesis that contaminated soils have not resulted in ground water contamination.
Proposed Methods, Equipment, and material:
Temporary Storage of Wastes: Container & Location

/95 **Design and Construction of Temporary Storage Area**
Location, dimensions, container types, labelling, accumulation times, materials, posting, include figures.

/95 **Removal of Hazardous Waste from Temporary Storage Area**
Time of Day:
Proposed Methods, Containers, Equipment, and material:
Route of Vehicles:
Decon of vehicles prior to leaving site:
Destination and Distance

/95 **Sampling Plan Temporary Storage Area**
Sample Design: Random ?
Objectives: To test the hypothesis that stored wastes were not released to soils at levels exceeding DTSC health-based performance criteria.
Proposed Methods, Equipment, and material:
Temporary Storage of Wastes: Container & Location

/95 **Excavation plan for the Temporary Storage Area**

/95 & 96 **Ground water Investigations**
Include the following statement: "The California Regional Water Quality Control Board, San Francisco Bay Region has lead responsibility in the oversight of the groundwater pollution management associated with the RCRA units. The groundwater

pollution management strategy at the RCRA units will be incorporated into the Site-Wide Remedial Management Plan (SRMP)."

Include the Notice of Deed Restriction Of Use Of Property, 3801 East Eight Street, Oakland, California signed by Senior Vice President, American National Can, notarized February 17, 1994 and issued to Kmart Corporation and pertaining to ground water restrictions. Include Exhibit A, parcel A and B Map 6621, filed February 15, 1994, in Map Book 211 pages 89 and 90, Alameda County records.

pollution management strategy at the RCRA units will be incorporated into the Site-Wide Remedial Management Plan (SRMP)."

Include the Notice of Deed Restriction Of Use Of Property, 3801 East Eight Street, Oakland, California signed by Senior Vice President, American National Can, notarized February 17, 1994 and issued to Kmart Corporation and pertaining to ground water restrictions. Include Exhibit A, parcel A and B Map 6621, filed February 15, 1994, in Map Book 211 pages 89 and 90, Alameda County records.

State of California Environmental Protection Agency
Department of Toxic Substances Control, Region 2
Facility Permitting Branch
700 Heinz Avenue, Berkeley, California 94710

Date: 4/13/95 **Number of Pages Including Cover** 3

Deliver To:
Name: Barney Chan
Phone:

From:
Name: Steve Kinn
Phone: 510 540 3959

Comments:

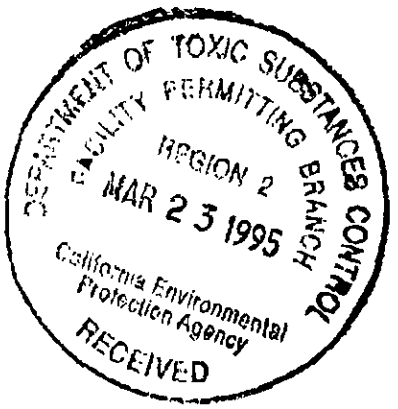
This fax came from Region 2 Office Fax #(510) 540-3937. If you have any problem with this transmission, or if you have not received all of the pages, please call (510) 540-3734.

State of California Department of Toxic Substances Control

Memorandum

To : Steve Krival
DTSC Region 2

Date: March 23, 1995



From : Howard S. Okamoto
Hazardous Materials Laboratory

Subject: Former American National Can Co. Facility -- Review of TPH Chromatography Data from Anametrix, Inc.

You requested that the chromatography data in the RUST Environment & Infrastructure documents provided to HML for review be compared with the type of products presumed to have been stored in the flammable liquid storage room of the former American National Can Co. MSDSs of these products were included in the document package. I have the following comments and recommendations after reviewing these documents.

1. Chromatograms of the mineral spirits and gasoline calibration standards were not included in the document package. Since direct comparison of the reference standards with the sample chromatograms could not be made, the following comments are based on the general chromatographic responses expected for mineral spirits and related petroleum distillates that are analyzable by methods 5030/8015.

2. The narrow band of hydrocarbon responses (approximate retention time range of 12 to 15 min.) observed in the chromatograms for samples S1-6.0 (0.84 ppm), S4-3.0 (9.7 ppm), S5-5.0 (0.67 ppm), T1-6.5 (1700 ppm), T4-5.0 (0.62 ppm), B12-2 (8.8 ppm) and B12-3 (0.8 ppm) appear to be typical of mineral spirits and/or petroleum distillates which possess a fairly narrow boiling point range. The hydrocarbon responses observed in the chromatograms would probably be similar to the chromatographic responses expected from the petroleum distillates fraction in the following products described in the MSDS information sheets.

   Mineral Spirits 66 (Ashland) [distillate initial b.p. 300°F]
   Shell Mineral Spirits 145 EC (Shell Chemical Co.) [distillate b.p. range 314-383°F]
   Low Scorch C Enamel Base (Cook Paint & Varnish Co.) [distillate b.p. range 305-390°F]
   C Enamel Base (Cook Paint & Varnish Co.) [distillate b.p. range 305-390°F]
   Keyhole Inhibitor for C Enamel (Cook Paint & Varnish Co.) [distillate b.p. range 350-410°F].

   Sanitary Enamel (The O'Brien Corporation) [distillate b.p. range 280-343°F] however, contains primarily xylene(s) (45-50% v/v) and other aromatic hydrocarbons (10-15% v/v).

3. Low level hydrocarbon responses (but less than the reporting limit of 0.5 ppm) similar to those described in item #2 were also observed in samples T2-2.0, T3-5.0, B12-1, B12-4 and B12-5. However, it is not clear if these responses were true sample responses or merely the result of sample carryover.

4. The quantitation report for sample B12-1 indicated that o-xylene (retention time 12.42 min) was present at 40 ppb, but it was not reported in the final report (presumably because the request did not include volatile aromatic compounds). The chromatogram from the photoionization detector (PID) also suggested that other unidentified compounds eluting before 12 min. may have been volatile aromatic compounds.

5. Low levels of volatile hydrocarbons (retention time range 1 to 10 min.) appeared to be present in samples S1-6.0 and B12-1, but at less than the reporting level of 0.5 ppm as gasoline.

6. Mineral spirits generally fall within the upper end of the applicable boiling point range for purge and trap/GC-FID analysis (methods 5030/8015) for volatile petroleum hydrocarbons. Weathering of mineral spirits could result in loss of the more volatile range of hydrocarbons. The less volatile (higher boiling point) range of hydrocarbons remaining would not be adequately detected and quantitated by the purge and trap procedure. Methods 3540 (or 3550)/8015 should also be used if semi-volatile petroleum hydrocarbons are suspected to be present at the site.

7. Method 8020 should be used if volatile aromatic compounds need to be identified and monitored. Two samples (S1-6.0 and B12.1) appeared to contain low-levels of volatile hydrocarbons with retention time less than 12 min. and possibly ppb levels of aromatic hydrocarbons. The MSDS information also indicated that at least one product containing volatile aromatic hydrocarbons may have been stored in the flammable solvent storage room.

8. The MSDSs provided did not indicate that halogenated hydrocarbons were included in the products. Therefore, unless other information is available to suggest that halogenated solvents were used at the site, I do not see the need to recommend methods 8010 or 8240/8260.

You also asked that the laboratory data be reviewed to determine if you should request HML to perform data validation of the laboratory results. I have the following comments.

1. The data quality objectives were not available in the documents, therefore it cannot be determined if the laboratory results met the required objectives.

2. The complete data package for the TPH analysis was not available in the document package submitted to HML. Only chromatograms, quantitation reports and the final reports for the soil samples were provided. The final reports also included the QC results and blank results. The quantitation reports do not clearly indicate how gasoline and mineral spirits are distinguished from each other and how each category of hydrocarbons is quantitated (however, gasoline was not detected above the reporting limit of 0.5 mg/kg).

3. The 8240 and TPHgBTEX final reports for stockpiled soil sample A4SS were missing from the document package.

4. With the limited amount of laboratory data provided, I am unable to determine if data validation of the results is warranted.

cc: Bart Simmons
Arthur Holden

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

Hazardous Materials Inspection Form

1131 Harbor Bay Pkwy
Alameda CA 94502
510/567-6700

II, III

Site ID # _____ Site Name ANC Today's Date 4/5/95

Site Address 3800 E8th St

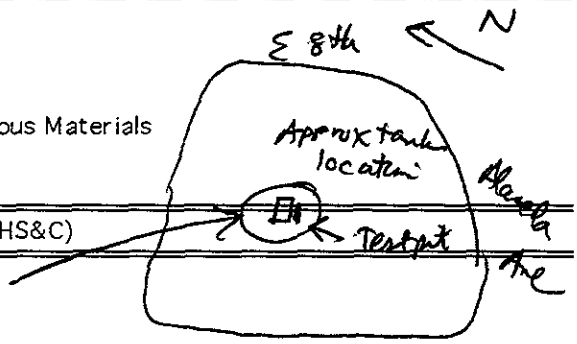
City Oak Zip 94601 Phone _____

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

Inspection Categories:

____ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
____ II. Hazardous Materials Business Plan, Acutely Hazardous Materials
X III. Underground Storage Tanks

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



Comments:

Witness the excavation & removal of an approx 1000 Gallon steel tank from N/i corner of ANC pte. Former contents suspected to be acetone. The tank was exposed during grading + the top ripped open. Tank contents is moist sandy/ mild organic odor. The soil is being dug out by hand + contents will be disposed as a RCRA waste.
- HSR contractor
- Dave Trumbly PES
- Dick Brazinsky RUST

Tank approx. 12' x 28½', Approx 2 cyds. of sand (moist)
Tank is rusted, no obvious holes other than the ripped open top of container.
- Will overexcavate pit to approx dimensions of 14' x 7'
- Note top of tank was approx 4' BGS originally
A test pit was dug to the South of the tank + soil tested, GW(?) in pit approx 4+4 = 8' BGS (GW approx 1' below bottom sples)
- Baggy sples initially tested w/ OVM one from each sidewall + 2 floor sples. all sples were ND in field screening instrument
- confirmatory sil sples will be taken @ the 6 locations also.
Sples to be run for VOCs, Method 8240

II, III

Contact R. Bruzinski
Title Project Geologist - RUST
Signature Richard Bruzinski

Inspector B. Chan
Signature B Chan

- Approx $\frac{10 \times 10 \times 4}{30} = 11$ cy total exc. soils

Barney Chan
4/18/95

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION

1131 HARBOR BAY PARKWAY, STE 250
ALAMEDA, CA 94502-6577
TELE: (510) 567-6700
FAX: (510) 337-9335

ACCEPTED
Underground Storage Tank Closure Plan Is Applicable Law
Alameda County Division of Hazardous Materials
80 Swan Way, Suite 200
Oakland, CA 94621
Telephone: ( ) 20

These closure/removal plans received and found to be acceptable and consistent with requirements of State and Local Health Laws. Closure plans indicated by this Department are to be released for issuance of any required construction/destruction permit.

One copy of this plan must be on the job and available to all contractors and shall be followed with the removal.

Any changes in the specifications must be submitted to the Fire and Building Inspections and approved. Such changes must meet the requirements of the Ordinance.

Notify this office at least prior to the following required inspections:

_____ Tank(s) and Piping

_____

_____ Fill

Issuance of a permanent site clearance is dependant upon completed plans and all applicable laws and

PENALTY FOR
INSPECTIONS

Date:

UNDERGROUND TANK CLOSURE PLAN

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

1. Business Name American National Can Co.

   Business Owner same as above

2. Site Address 3801 East 8th St.

   City Oakland, CA. Zip 94601 Phone N/A

3. Mailing Address 8770 Bryn Mawr, mail code 11 H (Local Contact)

   City Chicago, Illinois Zip 60631 Phone 408/232-2800

4. Land Owner American National Can Co.

   Address 8770 W. Bryn Mawr City, State Chicago, Ill. Zip 60631

5. Generator name under which tank will be manifested American National Can Co.

   EPA I.D. No. under which tank will be manifested CAD007 162116

6. Contractor HSR, Inc.

Address 3851 Charter Park Drive; Ste A.

City San Jose, CA. Phone 408/265-4300

License Type* A + HAZ ID# 574623

*Effective January 1, 1992, Business and Professional Code Section 7058.7 requires prime contractors to also hold Hazardous Waste Certification issued by the State Contractors License Board. Indicate that the certificate has been received, in addition, to holding the appropriate contractors license type.

7. Consultant RUST Environment & Infrastructure

Address 695 River Oaks Parkway

City San Jose, CA. 95134 Phone 408/232-2800

8. Contact Person for Investigation

Name Richard Bwzinski Title Senior Geologist

Phone 408/232-2820

9. Number of tanks being closed under this plan 1

Length of piping being removed under this plan 60'

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 Gibson Oil/Pilot Petroleum EPA I.D. No. CAD043260702

Hauler License No. _____ License Exp. Date _____

Address 475 Seaport Blvd.

City Redwood City State CA Zip 94063

b) Product/Residual Sludge/Rinsate Disposal Site

Name Gibson Oil/Pilot Petroleum EPA I.D. No. CAD043260702

Address 475 Seaport Blvd.

City Redwood City State CA Zip 94063

c) Tank and Piping Transporter

Name Erickson, Inc EPA I.D. No. CAD009466392

Hauler License No. 0019 License Exp. Date N/A

Address 255 Parr Blvd.

City Richmond State CA Zip 94801

d) Tank and Piping Disposal Site

Name Erickson, Inc. EPA I.D. No. CAD009466392

Address 255 Parr Blvd.

City Richmond State CA Zip 94801

11. Experienced Sample Collector

Name Richard Burzinski; REA; R.G.

Company RUST E & I

Address 695 River Oaks Parkway

City San Jose State CA Zip 95134 Phone 408/232-2800

12. Laboratory

Name ANAMETRIX

Address 1961 Concourse Drive

City San Jose State CA Zip 95131

State Certification No. 1234

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

If yes, describe. not to our knowledge so far.

14. Describe methods to be used for rendering tank inert

Dry ice as required.

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)		
≈ 1,000 gallon	unknown fuel	tank contents and soil.	bottom samples, one at each end of tank. Sidewall samples, one each on all four sides.

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) 100 yards	Sampling Plan 4 samples every 50 yards to be composited in analytical lab and tested for TPHg/BTEX and TPHd.

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
* gasoline or diesel fuel BTEX	~~LUFT - TPHg/BTEX~~ ~~LUFT - TPHd~~	LUFT - TPHg/BTEX LUFT - TPHd	LUFT 1ppm soil, 50ppb H2O LUFT 1ppm soil, 50ppb H2O soil - 0.005ppm water - 0.5ppb
* Analytes subject to contents being either gas or diesel fuel, additional analytes may be requested if contents were otherwise			

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

18. Submit Worker's Compensation Certificate copy

Name of Insurer State Compensation Insurance Fund

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) HSR, Inc.

Signature Richard Bruschi for HSR

Date 4/3/95

Signature of Site Owner or Operator

Name (please type) American National Can Co. c/o RUST E&I.

Signature Richard Bruschi as limited agent for American National Can.

Date 4/3/95

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.

16. CHEMICAL METHODS AND ASSOCIATED DETECTION LIMITS
See attached Table 2.

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) An outline of briefings to be held before work each day to appraise employees of site health and safety hazards;

c) Identification of health and safety hazards of each work task. Include potential fire, explosion, physical, and chemical hazards;

d) For each hazard, identify the action levels (contaminant concentrations in air) or physical conditions which will trigger changes in work habits to ensure workers are not exposed to unsafe chemical levels or physical conditions;

e) Description of the work habit changes triggered by the above action levels or physical conditions;

f) Frequency and types of air and personnel monitoring - along with the environmental sampling techniques and instrumentation - to be used to detect the above action levels. Include instrumentation maintenance and calibration methods and frequencies;

g) Confined space entry procedures (if applicable);

h) Decontamination procedures;

i) 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, plastic sheeting, security guards, etc.);

j) Spill containment/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;

k) Documentation that all site workers have received the appropriate OSHA approved trainings and participate in appropriate medical surveillance per 29 CFR 1910.120; and

l) 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(b)(4), 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

HYDROCARBON LEAK	SOIL ANALYSIS	WATER ANALYSIS
Unknown Fuel	TPH G GCFID(5030) TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH G GCFID(5030) TPH D GCFID(3510) BTX&E 602, 624 or 8260
Leaded Gas	TPH G GCFID(5030) BTX&E 8020 OR 8240 TPH AND BTX&E 8260 TOTAL LEAD AA ------Optional------- TEL DHS-LUFT EDB DHS-AB1803	TPH G GCFID(5030) BTX&E 602 or 624 TOTAL LEAD AA TEL DHS-LUFT EDB DHS-AB1803
Unleaded Gas	TPH G GCFID(5030) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH G GCFID(5030) BTX&E 602, 624 or 8260
Diesel, Jet Fuel and Kerosene	TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH D GCFID(3510) BTX&E 602, 624 or 8260
Fuel/Heating Oil	TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH D GCFID(3510) BTX&E 602, 624 or 8260
Chlorinated Solvents	CL HC 8010 or 8240 BTX&E 8020 or 8240 CL HC AND BTX&E 8260	CL HC 601 or 624 BTX&E 602 or 624 CL HC AND BTX&E 8260
Non-chlorinated Solvents	TPH D GCFID(3550) BTX&E 8020 or 8240 TPH AND BTX&E 8260	TPH D GCFID(3510) BTX&E 602 or 624 TPH and BTX&E 8260
Waste and Used Oil or Unknown (All analyses must be completed and submitted)	TPH G GCFID(5030) TPH D GCFID(3550) TPH AND BTX&E 8260 O & G 5520 D & F BTX&E 8020 or 8240 CL HC 8010 or 8240	TPH G GCFID(5030) TPH D GCFID(3510 O & G 5520 C & F BTX&E 602, 624 or 8260 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* PCP* PNA CREOSOTE	 PCB PCP PNA 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 hydro- carbons, 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:**

	SOIL PPM	WATER PPB
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.

10. 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.

11. 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 chroma- togram(s), the type of column used, initial temperature, temperature program is C/minute, and the final temperature.

12. 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 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.

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION
Declaration of Site Account Refund Recipient
SITE OWNER FILLS OUT PER SITE
-- OPTIONAL --

The property owner will use this form to designate someone other than him- or her- self to receive any refund due at the completion of all deposit/refund projects at the site listed below. In the absence of this form, the property owner will receive any refund. Only one person at any one time may be designated to receive any refund.

SITE NUMBER/ADDRESS:

Site Number

American National Can Co.
Company Name

3801 E. 8th St.
Street Address

Oakland, CA. 94601
City Zip Code

PROPERTY OWNER

American National Can Co.
Owner's Name

8770 West Bryn Mawr
Owner's Address

Chicago, Ill. 60631
Owner's City State Zip

I designate the following person to receive any refund due at the completion of all deposit/refund projects:

HSR, Inc.
Name

3851 Chanter Park Drive, Suite A.
Street Address

San Jose, CA. 95136
City / Zip

Richard Burzinski as limited agent for American National Can 4-3-95
Property Owner Signature Date

Richard Burzinski as limited agent for American National Can.
Property Owner Name

RETURN FORM TO: Alameda County Environmental Health
Environmental Protection Division
1131 Harbor Bay Parkway, Rm. 250
Alameda, CA 94502-6577 CC:430-4510

DR-DECL; mfk; 8/14/91

STATE COMPENSATION INSURANCE FUND

P.O. BOX 420807, SAN FRANCISCO, CA 94142-0807

CERTIFICATE OF WORKERS' COMPENSATION INSURANCE

SEPTEMBER 30, 1994

POLICY NUMBER: 1357591 - 94
CERTIFICATE EXPIRES: 8-1-95

AMERICAN NATIONAL CAN COMPANY
ATTN KRISTI STRATTON
8770 WEST BRYN MAWR AVE
CHICAGO IL 60631

JOB: 941301 EAST 8TH AND HIGH ST OAKLAND, CA

This is to certify that we have issued a valid Workers' Compensation insurance policy in a form approved by the California Insurance Commissioner to the employer named below for the policy period indicated.

This policy is not subject to cancellation by the Fund except upon ten days' advance written notice to the employer.

We will also give you TEN days' advance notice should this policy be cancelled prior to its normal expiration.

This certificate of insurance is not an insurance policy and does not amend, extend or alter the coverage afforded by the policies listed herein. Notwithstanding any requirement, term, or condition of any contract or other document with respect to which this certificate of insurance may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

John A. Dutt

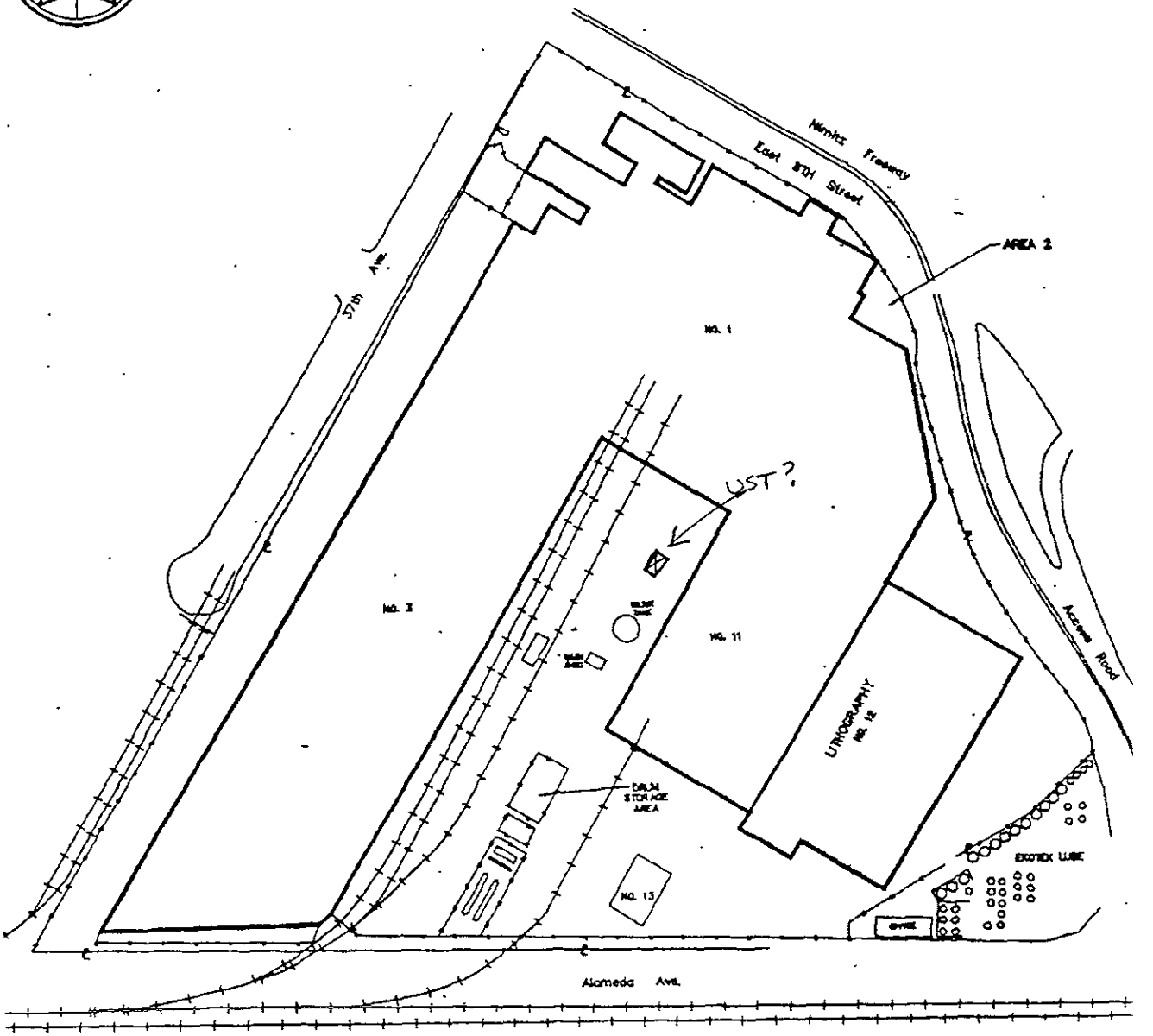
PRESIDENT

EMPLOYER

J/D HAZARDOUS SUBSTANCE REMOVAL
HSR INC
3851 CHARTER PARK DR #A
SAN JOSE CA 95136

SCIF 10262 (REV. 10-86)

COPY FOR INSURED'S FILE



SCALE IN FEET

0 200 40

SITE MAP

RUST ENVIRONMENT & INFRASTRUCTURE

AMERICAN NATIONAL CAN CO.
FORMER OAKLAND, CALIFORNIA FACILITY

TOWN OF OAKLAND ALAMEDA CO

PROJECT NO. 35195.108	DATE 1/30/95	DWG. NO. 35195-17	SCALE 1"=200'	FIGURE NO. 2

Friday, March 17, 1995 **11:46 AM**

From:

Name: David A. Gavrich

Company: ECDC Environmental

Phone: (415) 421-2044

Fax: (415) 421-1462

To:

Name: Mr. Ed Alusow

Company: Rust Environmental

Phone: (518) 458-1313

Fax: (518) 458-2472

Total number of pages, including cover: 2

Message:

ED - PLEASE SEE ATTACHED LANGUAGE FROM TITLE 22. AS I MENTIONED, WE ARE COMPLETELY CLOSING THE PORTION OF ALAMEDA AVENUE ADJACENT TO THE GATE SO WE CAN LOAD. THIS FALLS SQUARELY WITHIN THE REGULATIONS AS "ADJACENT LAND USED IN CONNECTION WITH THE FACILITY OR ACTIVITY". AS I ALSO MENTIONED TO YOU, THERE IS NO CHANGING OF CONTAINERS AND MATERIAL IS NOT BEING PLACED ON THE GROUND. WE THINK THAT THIS IS CLEARLY WITHIN THE LEGAL BOUNDARIES OF TITLE 22 AND MORE CLEAR THAN OTHER PROJECTS ON WHICH DTSC HAS BEEN OUT TO OBSERVE OUR LOADING OPERATIONS. WE ARE MOVING FORWARD PER THE AGREEMENT UNLESS I HEAR DIFFERENT.....D.G.

Ed asked me to send it to you.

RUST ENVIRONMENT & INFRASTRUCTURE	Date 3-28-95 # of pages 3
To Bonnie Chan	From Dick Burgbacher
Co. AC DEH	Phone # (408) 282-2800
Fax # 510/337-9335	Fax # (408) 282-2801
Comments Bonnie! I sent this to Steve Kinsey.	

(1) Any release which results in exposure to persons solely within a workplace, with respect to a claim such exposed persons may assert against their employer.

(2) Emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, vessel or pipeline pumping station engine.

(3) Release of source, byproduct, or special nuclear material from a nuclear incident, as those terms are defined in the Atomic Energy Act of 1954 (42 U.S.C. 2011, et seq.), if such release is subject to requirements with respect to financial protection established by the Nuclear Regulatory Commission under section 2210 of Title 42 of the United States Code or, for the purpose of section 104 of the federal act (42 U.S.C. 9604) or any other response action, any release of source byproduct, or special nuclear material from any processing site designated under section 7912(a)(1) or 7942(a) of Title 42 of the United States Code, which sections are a part of the Uranium Mill Tailings Radiation Control Act of 1978.

(d) The normal application of fertilizer, plant growth regulants and pesticides.

For the purposes of chapters 14 and 15, "Repaired" means that equipment is adjusted, or otherwise altered, to eliminate a leak.

"Remediation waste" means all solid and hazardous wastes, and all media (including groundwater, surface water, soils, and sediments) and debris, which contain listed hazardous wastes or which themselves exhibit a hazardous waste characteristic, that are managed for the purpose of implementing corrective action requirements under articles 6, 15.3, or 17 of chapter 14 or article 18 of chapter 15 of this division, Health and Safety Code sections 25200.10 or 25187, or section 25358.9 where as provided for under the provisions of that section the Department has excluded the removal or remedial action at a site from the hazardous waste facilities permit required by Health and Safety Code section 25201, or federal RCRA section 3004(u) [U.S.C. Title 42, section 6924(u)]. For a given facility, remediation wastes may originate only from within the facility boundary, but may include waste managed in implementing Health and Safety Code Sections 25200.10 or 25187, or section 25358.9 where as provided for under the provisions of that section the Department has excluded the removal or remedial action at a site from the hazardous waste facilities permit required by Health and Safety Code section 25201, or federal RCRA sections 3004(v) [U.S.C. Title 42, section 6924(v)] or 3008(h) [U.S.C. Title 42, section 6928(h)] for releases beyond the facility boundary.

"Representative sample" means a sample of a universe or whole (e.g., waste pile, lagoon, ground water) which can be expected to exhibit the average properties of the universe or whole.

"Residuals Repository" means a hazardous waste facility or part of a facility that is permitted to accept for land disposal only non-liquid, treated hazardous waste (as defined in Section 25179.3(i), Health and Safety Code). Non-liquid means non-liquid and containing less than 50 percent moisture by weight as determined in accordance with Section 66268.317 of this Division.

"Resource recovery facility" means an offsite hazardous waste facility whose principal method of hazardous waste management is the handling, recycling, treatment, use or reuse of recyclable material and which meets the requirements in chapter 16 of this division.

"Restricted hazardous waste" means any hazardous waste which is subject to land disposal restriction pursuant to Health and Safety Code section 25179.6 or chapter 18 of this division.

"Retrograde material" means any hazardous material which is not to be used, sold or distributed for use in or originally intended or prescribed manner or for an originally intended or prescribed purpose and which meets any one or more of the following criteria:

(a)(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;

(4) cannot be used for reasons of economics, health or safety or environmental hazard.

(b) "Retrograde material" does not include material listed in section 66261.33 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.

"Run-off" means any rainwater, leachate or other liquid that drains over land from any part of a facility.

"Run-on" means any rainwater, leachate or other liquid that drains over land onto any part of a facility.

"Saturated zone" or "zone of saturation" means that part of the earth's crust in which all voids are filled with water.

"Schedule of compliance" means a schedule of remedial measures included in a permit or order, including an enforceable sequence of interim requirements (for example, actions, operations or milestones stated) leading to compliance with applicable law.

"Scrap metal" means (a) any one or more of the following, except as provided in subsection (b) of this section:

(1) manufactured, solid metal objects and products;

(2) metal workings, including cuttings, trimmings, stampings, grindings, shavings and sandings; or

(3) solid metal residues of metal production.

(b) "Scrap metal" excludes all of the following:

(1) lead-acid storage batteries, waste elemental mercury, and water-reactive metals such as sodium, potassium and lithium;

(2) magnesium borings, trimmings, grindings, shavings and sandings and any other forms capable of producing independent combustion;

(3) beryllium borings, trimmings, grindings, shavings, sandings and any other forms capable of producing adverse health effects or environmental harm in the opinion of the Department;

(4) any metal contaminated with a hazardous waste, such that the contaminated metal exhibits any characteristic of a hazardous waste under article 3 of chapter 11 of this division;

(5) any metal contaminated with an oil that is a hazardous waste and that is free-flowing;

(6) sludges, fine powders, semi-solids and liquid solutions that are hazardous wastes).

"Semitrailer" means a vehicle designed for carrying persons, property or waste, used in conjunction with a motor vehicle, and so constructed that some part of its weight and that of its load rests upon, or is carried by, another vehicle.

For the purposes of chapters 14 and 15, "Sensor" means a device that measures a physical quantity or that change in a physical quantity, such as temperature, pressure, flow rate, pH, or liquid level.

For the purposes of chapters 14 and 15, "Separator tank" means a device used for separation of two immiscible liquids.

"Series A Resource Recovery Facility Permit" means a type of hazardous waste facility permit issued by the Department which grants the authority to operate a resource recovery facility that meets the criteria in section 66266.1.

"Series B Resource Recovery Facility Permit" means a type of hazardous waste facility permit issued by the Department which grants the authority to operate a resource recovery facility that meets the criteria in section 66266.2.

"Series C Resource Recovery Facility Permit" means a type of hazardous waste facility permit issued by the Department which grants the authority to operate a resource recovery facility that meets the criteria in section 66266.3.

"Site" means the land or water area where any facility or activity is physically located or conducted, including adjacent land used in connection with the facility or activity.

"Sludge" means any solid, semi-solid or liquid waste generated from a municipal, commercial or industrial wastewater treatment plant, water

Monday, March 27, 1995 3:07 PM

From:

Name: David A. Gavrich

Company: ECDC Environmental

Phone: (415) 421-2044

Fax: (415) 421-1462

To:

Name: Mr. Dick Burzinski

Company: Rust Environmental

Phone: (408) 232-2800

Fax: (408) 232-2801

Total number of pages, including cover: 3

Message:

DICK - OBVIOUSLY CHEM WASTE IS PUSHING RUST HARD BECAUSE ED ALUSOW ASKED THE SAME QUESTION 10 DAYS AGO. WE RESPONDED WITH THE ATTACHED TITLE 22 REGULATIONS. ED AND THE ANC LEGAL DEPARTMENT WERE OBVIOUSLY SATISFIED WITH THE RESPONSE, SINCE WE HAVE NOT HEARD FROM THEM SINCE. REGARDING YOUR QUESTION ABOUT THE SOUTHERN PACIFIC PROPERTY, WE ARE ACTUALLY RUNNING THE LOADER ALONG AN SP SPUR RAIL EASEMENT WHICH CROSSES THE MIDDLE OF ALAMEDA AVENUE FROM ANC AND GOES RIGHT TO THE LOADING TRACK. WE WILL DEFINITELY BE ON "ADJACENT LAND USED IN CONJUNCTION WITH THE FACILITY OR ACTIVITY". WE WILL CONTINUE TO PROVIDE YOU WITH UPDATES ON THE TRAIN.....D.G.

STATE OF CALIFORNIA PETE WILSON, *Governor*

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, Suite 500
OAKLAND, CA 94612
Tel: (510) 286-1255
FAX: (510) 286-1380

Mr. Lester Kaufman, Chief
Permitting Division, DTSC
Region 2
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2737

March 9, 1995
File No.: 2223.09(SA)
NBT Case File

Subject: Former American National Can Company, Oakland, Alameda County.

Dear Mr. Kaufman:

Regional Water Quality Control Board (RWQCB) Staff in conjunction with the Alameda County Department of Environmental Health (ACDEH) Staff are overseeing the investigation, cleanup and management of soil and groundwater pollution at several locations on the subject site. I understand your staff are overseeing the closure of the two RCRA units on site. Several USTs, associated product pipe lines, and polluted soil have been removed from the site, and the remaining soil and groundwater pollution will be contained and managed by implementing a site-wide risk management plan (SRMP). My staff shall take lead responsibility in the oversight of the groundwater pollution management associated with the RCRA units. The groundwater pollution management strategy at the RCRA units will be incorporated into the SRMP.

Please contact Sumadhu Arigala at (510) -286-0434, if you have any questions regarding this letter.

Sincerely,

Steven Ritchie,
Executive Officer.

Stephen Morse,
Chief, Toxics Cleanup.

CC: See distribution list

Distribution List

Barney Chan, ACDEH
1131 Harbor Bay Pkwy., # 250
Alameda, CA 94502-6577

Joseph Moran, Esq.
American National Can Co.
Mail Suite 14C
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631-3542

Edward Alusow
Rust E & I
12 Metro Park Road
Albany, NY 12205

Richard Burzinski, Rust E & I
695 River Oaks Pkwy
San Jose, CA 95134

John Nunes
UFCW Local 870
28870 Mission Blvd.
Hayward, CA 94544

Steve Krival, DTSC, Region 2
700 Heinz Ave., Suite 200
Berkeley, CA 94710-2737

David Bruegel
Dickinson, Wright, Moon..
525 North Woodward Ave
P. O. Box 509, Bloomfield Hills
Michigan 48303-0509

Robert Creps
PES Environmental, Inc.
1682 Novato Blvd., Suite 100
Novato, CA 94947

James Kessler, HSA
100 Bush Street, 26th Floor
San Francisco, CA 94104

Brian Matsumura
Process Coordinator III
Office of Planning & Building
1330 Broadway, 2nd Floor
Oakland, CA 94612

STATE OF CALIFORNIA PETE WILSON, *Governor*

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, Suite 500
OAKLAND, CA 94612
Tel: (510) 286-1255
FAX: (510) 286-1380

Mr. Lester Kaufman, Chief
Permitting Division, DTSC
Region 2
700 Heinz Avenue, Suite 200
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Sincerely,

Steven Ritchie,
Executive Officer.

Stephen Morse,
Chief, Toxics Cleanup.

CC: See distribution list

Distribution List

Barney Chan, ACDEH
1131 Harbor Bay Pkwy., # 250
Alameda, CA 94502-6577

Joseph Moran, Esq.
American National Can Co.
Mail Suite 14C
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631-3542

Edward Alusow
Rust E & I
12 Metro Park Road
Albany, NY 12205

Richard Burzinski, Rust E & I
695 River Oaks Pkwy
San Jose, CA 95134

John Nunes
UFCW Local 870
28870 Mission Blvd.
Hayward, CA 94544

Steve Krival, DTSC, Region 2
700 Heinz Ave., Suite 200
Berkeley, CA 94710-2737

David Bruegel
Dickinson, Wright, Moon..
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P. O. Box 509, Bloomfield Hills
Michigan 48303-0509

Robert Creps
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1682 Novato Blvd., Suite 100
Novato, CA 94947

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San Francisco, CA 94104

Brian Matsumura
Process Coordinator III
Office of Planning & Building
1330 Broadway, 2nd Floor
Oakland, CA 94612

RUST ENVIRONMENT & INFRASTRUCTURE

RUST Environment & Infrastructure Inc.
12 Metro Park Road
Albany, NY 12205
Tel. (518) 458-1313 • FAX (518) 458-2472

March 6, 1995

Steve Krival, M.S.
Hazardous Substances Scientist
CAL-EPA, DTSC, Region 2
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2737

Dear Mr. Krival:

Subject: Relocation of RCRA Closure Materials

Rust Environment & Infrastructure (RUST) has been notified by Kmart that the recently excavated soils from the RCRA Closure acitivities that are staged temporarily at the site will impede their site activities where they are now located, and that they must be relocated.

As discussed with you last week, RUST will relocate the soils to the area designated on the enclosed site plan. The containment structure will be constructed in the following manner.. The area will be smoothed relatively flat and a soil berm constructed on all four sides. The equivelent of 20 mil visqueen will be laid down and secured in place. Soil will be relocated to the new containment area and stockpiled directly on the visqueen.. The concrete will be relocated also to this area. All stockpiled soils and concrete will be covered with visqueen, and the visqueen secured. The base rock from the Drum Storage Area, and soil that was in contact with the base rock, will be placed in roll-off bins These bins will be staged in the new location alongside the four bins moved from the old location. All roll-off bins used are, or will be, lined with visqueen and State certified as water tight, and will be covered to prevent rain water infiltration. The fence, with the appropriate posted warning signs, will be dismantled from the original area and re-assembled around the new containment area.

It is RUST's intention to begin pad construction tomorrow morning, and begin the relocation of the materials by noon tomorrow, March 7, 1995.

Please contact me if you have any questions or comments regarding this letter and our planned activities.

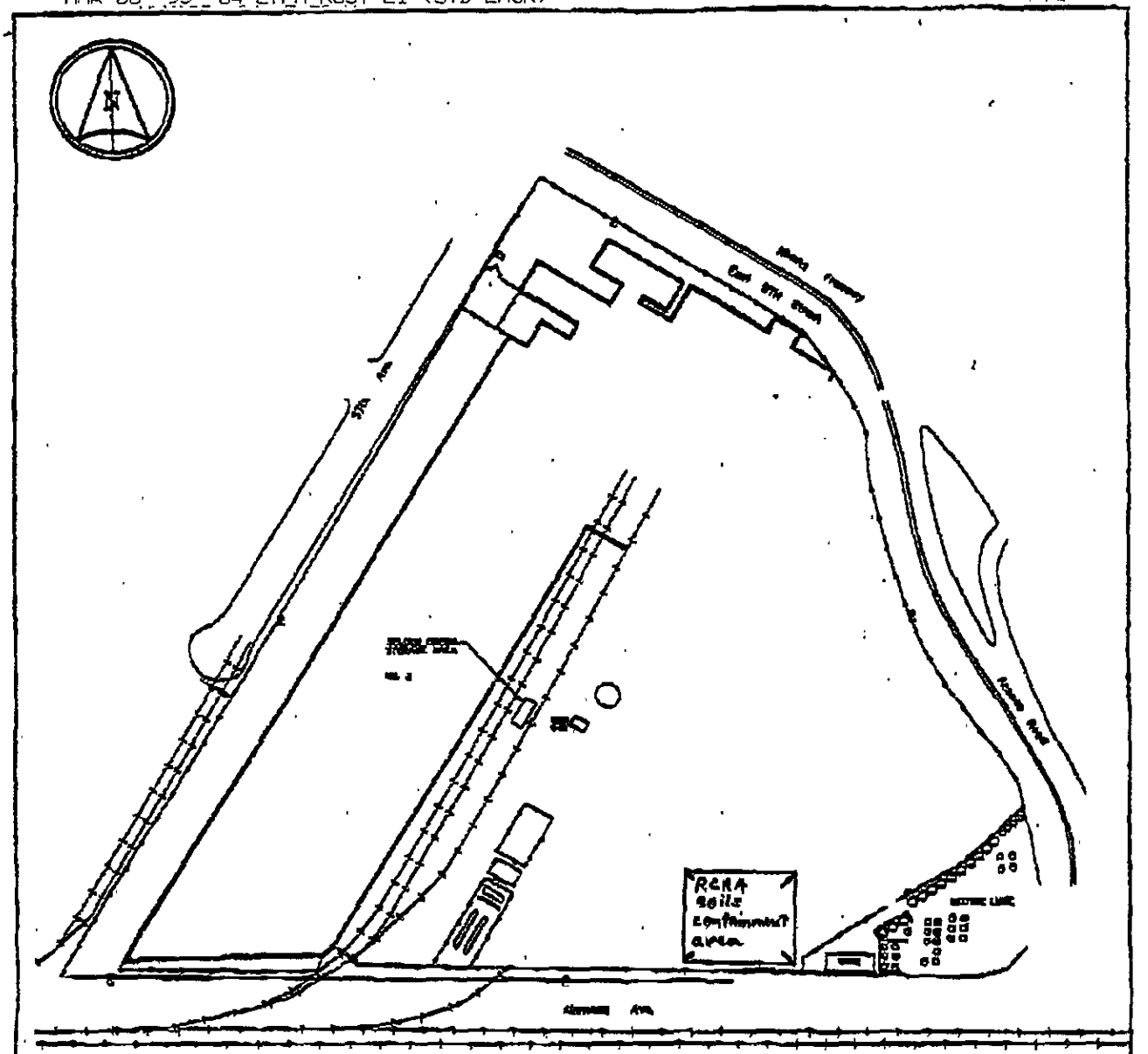
Very truly yours,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

Enclosure

cc: J. Moran, Esq., ANC
J. Peters, ANC
E. Rawlings, ANC
J. Kessler, HSA
R. Creps, PES
R. Williams, Kmart
D. Bruegel, Esq., Dickinson, Wright
R. Arulananthum, SFBRWQCB
S. Arigala, SFBRWQCB
B. Chan, ACDEH



RUST ENVIRONMENT & INFRASTRUCTURE

SITE PLAN

AMERICAN NATIONAL CAN CO.
FORMER OAKLAND, CALIFORNIA FACILITY

TOWN OF OAKLAND ALAMEDA COUNTY, CA

PROJECT NO. 35195.108	DATE 2/10/95	DWG. NO. 35195-22	SCALE 1"=200'	FIGURE NO. 3

TRANSMIT REPORT

1995,02-27 11:39
510 337 9335
ALAMEDA CO EHS HAZ-OPS

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
588	4159684633	02-27 11:38	00'35	01/01	OK		

7499402045

ALAMEDA COUNTY - ENVIRONMENTAL HEALTH - HAZARDOUS MATERIALS
DIVISION

MEMORANDUM

DATE: February 24, 1995

TO: See cc list

FROM: Barney Chan

SUBJ: Meeting to Discuss Sitewide Risk Management Plan for former American National Can, Oakland CA

Please be aware that a meeting has been set up to discuss and finalize the contents of the Sitewide Risk Management Plan for the former ANC, future K-Mart site. This will be your opportunity to comment and potentially modify the existing plan as presented in the February 15, 1995 RUST report. The meeting is scheduled for March 15, 1995 at 1:30 pm at the Alameda County Environmental Health office located at 1131 Harbor Bay Parkway, 2nd Floor, Alameda CA. Your attendance is appreciated.

Please let me know if you can make this meeting. You may either call me at (510) 567-6765 or fax a reply to (510) 337-9335.

cc: S. Arigala, RWQCB
R. Arulanantham, RWQCB
S. Krival, DTSC
R. Burzinski, RUST E&I
R. Krebs, PES
E. Alusow, RUST E&I

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To R. Burzinski	From B. Chan
Co. RUST E+I	Co. ACEH-HMD
Dept.	

ALAMEDA COUNTY - ENVIRONMENTAL HEALTH - HAZARDOUS MATERIALS DIVISION

MEMORANDUM

DATE: February 24, 1995

TO: See cc list

FROM: Barney Chan BC

SUBJ: Meeting to Discuss Sitewide Risk Management Plan for former American National Can, Oakland CA

Please be aware that a meeting has been set up to discuss and finalize the contents of the Sitewide Risk Management Plan for the former ANC, future K-Mart site. This will be your opportunity to comment and potentially modify the existing plan as presented in the February 15, 1995 RUST report. The meeting is scheduled for March 15, 1995 at 1:30 pm at the Alameda County Environmental Health office located at 1131 Harbor Bay Parkway, 2nd Floor, Alameda CA. Your attendance is appreciated.

Please let me know if you can make this meeting. You may either call me at (510) 567-6765 or fax a reply to (510) 337-9335.

cc: S. Arigala, RWQCB
R. Arulanantham, RWQCB
S. Krival, DTSC
R. Burzinski, RUST E&I
R. Krebs, PES
E. Alusow, RUST E&I

State of California - California Environmental Protection Agency Pete Wilson, Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, SUITE 500
OAKLAND, CA 94612

TEL: (510) 286-1255
FAX: (510) 286-1380
BBS: (510) 286-0404

February 23, 1995

BY FAX -- CERTIFIED MAIL TO FOLLOW
CERTIFIED MAIL NO.:

Mr. Joseph S. Moran
Assistant General Counsel -- Environmental
American National Can Company
Mail Stop 14C
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631-3542

Dear Mr. Moran:

Subject: Closure of RCRA Units at American National Can Company Facility -- Oakland, CA

This Regional Water Quality Control Board (RWQCB) is cooperating with the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) in the closure of two RCRA hazardous waste storage areas at American National Can Company's former facility in Oakland. The two storage areas are the Solder Dross and Drum areas. In order to enable your company to proceed expeditiously with remediation of these two areas the RWQCB hereby authorizes excavation of all contaminated concrete and soils from these areas and storage of these wastes on the site. This excavation and storage of these wastes shall be performed in conformance with the "Final Draft Closure Plan, American National Can Company -- Oakland Plant" dated January 1995, the Excavation and Sampling Plan Supplement of February 1995 to that draft Closure Plan and DTSC's letters dated March 10, July 8, August 5, September 23 and October 14, 1994; January 16 and 26 and February 11 and 23, 1995.

These wastes shall not be removed from the site until DTSC authorizes their removal by formal approval of your closure plan.

Please be advised that this authorization does not relieve American National Can Company from compliance with other applicable requirements of this RWQCB and/or DTSC.

Sincerely,

Steven R. Ritchie
Executive Officer

Stephen I. Morse,
Chief, Toxics Cleanup Division

RUST ENVIRONMENT & INFRASTRUCTURE

February 23, 1995

RUST Environment & Infrastructure Inc.
12 Metro Park Road
Albany, NY 12205
Tel. (518) 458-1313 • FAX (518) 458-2472

Steve Krival, M.S.
Hazardous Substances Scientist
CAL-EPA, DTSC, Region 2
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2737

Dear Mr. Krival:

Subject: RCRA Closure
Former ANC Oakland Facility
EPA ID# CAD009162116

As a result of the telephone conference call of earlier today, the following items identified by DTSC as required for closure of the Storage Areas will be addressed as stated.

1. During the post-excavation sample collection activities, the absence of organolead will be confirmed in the vicinity of sample location PB-5.3 by collecting four (4) soil samples: one sample from each of four sites at elevations equivalent to one foot above, one foot below, and one foot on either side of the location of sample PB-5.3; these samples will be analyzed for organolead.

2. Newly promulgated digestion Method 3060A will be utilized for hexavalent chromium analyses if the methodology is available for our use; otherwise, Method 3060 will be used.

3. Split samples will be collected for 10% of all samples for each analyte each day and submitted to a second laboratory for quality control purposes.

4. Reconfirm the calculation of the Reporting Limit for alcohol analyses.

5. Additional confirmation soil sampling in each area at locations depicted on maps provided by facsimile from the above referenced meeting participants. The total number of post-excavation samples to be collected from the Solder Dross Storage Area is twenty-one. The total number of samples to be collected from the Drum Storage Area will depend on the co-location of our proposed random systematic samples and your proposed authoritative samples, as depicted in the above referenced maps.

Very truly yours,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

Distribution

Distribution:

J. Moran, Esq., ANC
J. Peters, ANC
E. Rawlings, ANC
J. Kessler, HSA
R. Creps, PES
R. Williams, Kmart
D. Bruegel, Esq., Dickinson, Wright
R. Arulananthum, SFBRWQCB
S. Arigala, SFBRWQCB
B. Chan, ACDEH

American National CAN
K-Mart Meeting
2/23/95

Michelle Rembaum	CA/EPA DTSC	(510) 540-3766
Steve Krical	" "	510 540-3959
Jim Kessler	The Martin Group (Cheeh Street Associates)	(415) 772-5900
David Brueggel	Dickinson, Wright (Kmart atty)	810-433-7272
Rob Creps	PES Environmental	(415) 899-1600
Richard Burzinski	RUST E & I	(408) 232-2800
Dan Murphy	DTSC	(510) 540-3969
Lester Kaufman	" Corporate Construction	-3734
Richard Williams	Kmart ~~Corporate~~ Dept	810-637-4411
Scott Wilson	Kmart	916 334-2526
Barney Chan	ACEH-COP	510-567-6765

FAX (~~408~~) 232-2801

Kmart ~~Corporate~~ International Headqtrs
3100 W. Big Beaver Rd.
Troy MI 48084-3163

RUST ENVIRONMENT & INFRASTRUCTURE

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February 17, 1995

Steve Krival, M.S.
Hazardous Substances Scientist
CAL-EPA, DTSC, Region 2
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2737

Dear Mr. Krival:

Subject: Response to Comments
Former American National Can Facility
Oakland, California
EPA Identification No. CAD 009 162 116

This letter responds to your letter dated February 15, 1995, wherein you requested citations to the Excavation and Sampling Plan, Supplement to the Draft Final Closure Plan, dated February 14, 1995, for the subject facility where items and deficiencies identified in your letter of February 11, 1995, as amended on February 14, 1995, are addressed. We trust that this letter will provide sufficient identification of those items that were addressed. Those items that were not addressed in our Supplement will be provided by February 21, 1995, as you requested. We also are taking this opportunity to respond to your verbal comments left on my voice mail the evening of February 16, 1995. We appreciate your expeditious review of our submittals and will endeavor to provide you with the information you need to approve our Plans.

Closure Performance Standards

"Excavations shall remove all soil contaminated to concentrations above these standards"
Figures 1, 1a and 2 show the proposed limits of excavation that are based on your performance standards and soil analytical results. Excavation to these limits will remove soil from all locations where the investigation samples had concentration(s) that exceeded performance standards, with the exception of soil in the vicinity of sample PB5.3 where organolead was detected at 0.77 ppm. Based on discussions about this sample with our toxicologist, Tim Markey, and DTSC toxicologist, Steve Dezio, it was our understanding that this sole detected concentration of organolead below the black clay layer does not constitute a potential threat to health or the environment and would not require excavation. However, we will collect additional samples from the vicinity of this location from the bottom of the excavation to confirm the existence of the organolead. If the organolead is found to exist we will excavate additional quantities of soil and collect additional post-excavation samples.

"Your closure plan must include adequate details on sampling and analysis procedures...."
Details of sampling procedures are provided on Page 1, Section 1.0, paragraph 2 of the Excavation and Sampling Plan. Additional details on sampling procedures will be provided by February 21, 1995. All complete laboratory analytical reports are included as Appendix A. An inadvertently omitted lab report was transmitted to you with a letter dated February 15, 1995. The laboratory has been requested to provide to the Department directly all notes, data sheets, and quantification sheets as well as descriptions of how samples were prepared.

"We call to your attention laboratory errors..." (Hexavalent chromium PQL)
Inchcape is currently re-reviewing their reporting limits for hexavalent chromium results and will submit to you their findings, as well as their calculation for determining the reporting limits.

Management of RCRA Structures

"If these structures are not adequately characterized.... ....they must be managed as hazardous waste."
Page 6, Section 3.2.1, first paragraph, last sentence and Page 7, Section 3.2.2, first paragraph, last two sentences specify that the concrete from both storage areas will be declared, managed and disposed of as both RCRA and California Title 22 characteristic hazardous waste for lead.

Soil Excavation

"It is our understanding that ANC intends to confirm the extent of contamination during excavation. The procedure by which this is to be accomplished must be clearly described in your closure plan."
The procedure by which ANC intends to confirm the extent of contamination during excavation consists of: 1) excavating soil that has been shown to exceed performance standards or clean up levels; and 2) collecting an adequate number of post excavation samples to confirm that soil that exceeded the clean-up levels has been removed; and 3) repeating steps 1 and 2 if necessary until confirmation has been achieved. Page 6, Section 3.2.1 and Figures 1 and 1a provide a detail of materials that exceed clean-up standards in the Drum Storage Area (DSA) and Page 7, Section 3.2.2 provides a detail of materials that exceed clean-up standards in the SDSA. Section 4.0 provides a detailed post-excavation sampling plan.

"This description must include a soil sampling confirmation workplan which contains a plan view and cross-sections showing exact areas to be sampled in the floors and walls of the excavations."
Figures 4 and 5 of the Excavation and Sampling Plan provide a plan view showing the proposed locations of the post excavation sampling locations in the SDSA and DSA respectively. Cross sections showing post excavation sampling locations were not provided in the Excavation and Sampling Plan because only one (composite wall sample in the deeper area of excavation around

investigation borings PB-3 and PB-3d) of the twenty three post excavation samples was proposed to be a wall sample and the rest were to be floor samples. However, you have subsequently requested that wall samples be collected in the DSA excavation (described below) and therefore, cross sections showing post excavation sample locations will be provided by February 21, 1995.

"The workplan shall include the number of confirmation samples..."
Page 12, Section 4.3, paragraphs 3 and 4 describe the number of post excavation samples to be collected in the DSA and SDSA respectively. This brings to our attention that a late revision to the Excavation and Sampling Plan to add a second post excavation sample in the SDSA where 0.49 ppm of hexavalent chromium was detected in sample SDSA SH1 was incorporated into Figure 2, but not into the text (Section 4.2, first sentence and Section 4.3 - 3rd paragraph).

"*...and exact locations,...*"
Figures 5 and 6

"*...specific test methods,...*"
Page 13, Section 4.4

"*...sampling procedures...*"
Not included in Excavation and Sampling Plan. Will be provided by February 21, 1995.

"*...and schedule of activities.*"
Not included in Excavation and Sampling Plan. Will be provided by February 21, 1995.

"*Your closure plan should clearly document the known extent of contamination in the two areas. This must include:*"

- "*Plan and cross sectional views showing the extent of excavation.*"
  The "proposed extent of excavation" dashed lines of Figures 1, 1a and 2 equate to the extent of contamination.
- "*Contour concentration maps for each contaminant of concern*"
  Not included in Excavation and Sampling Plan. Will be provided by February 21, 1995.
- "*Plan and cross sectional views of the areas which it is now known must be excavated and estimates of the volumes of soil to be removed.*"
  Figures 1, 1a and 2 provides limits of excavation and the table in Section 3.4 on Page 9 provides an estimate of the volume to be excavated.

Storage of Structures and Soils

"*All excavated contaminated materials must be stored on site until the Department formally approves ANC's closure plan.*"

Page 8, Section describes the Roll-off Storage Bin Area. Page 9, Section 3.4, paragraph 3 describes storage of roll-off bins in the roll-off storage bin area until the CEQA permits off-site disposal.

"*A plan for storage....must include such information as:*"

- "*A plan drawn to scale showing the locations and extent of the storage area.*"
  Figure 3 of the Excavation and Sampling Plan is a scaled Site Plan which shows the locations/extent of the roll-off bin storage area.

- "*Description of means for excluding the public and casual workman from the area and of warning sign posting.*"
  Page 8, Section 3.3.2, Last sentence specifies that the entire storage area will be enclosed within a locked chain link fence. The Excavation and Sampling Plan does not specify the posting of warning signs. Please note that warning signs (minimum of 4) will be installed on the chain link fence.

- "*Description of means for controlling wind dispersion of soils.*"
  Page 8, Section 3.3.4 describes measures to control dust during excavation activities. Page 9, Section 3.4, paragraph 3, Sentence 3 specifies that each roll-off will be covered with a tarp to control dust emissions.

- "*Description of means for controlling storm runon and runoff from the area.*"
  Page 8, Section 3.3.2 specifies that the storage area will be bermed and lined with plastic.

- "*Description of containers to be used for storage. These should be water tight.*"
  Page 9, Section 3.4, paragraph 3, sentence 2 specifies that each roll-off will be lined with plastic (watertight).

Other Information for Closure Plan

Excavation Plan Submittal Dated February 9, 1995
NOTE: The excavation plan submitted to you was a Draft version for you to develop a preliminary understanding of our approach to storage of excavated materials.

"*Modify health and safety plan to protect for dermal exposure to organolead, and inhalation exposure to semi-volatile and volatile organic compounds.*"
Not included in Excavation and Sampling Plan. Will be provided by February 21, 1995.

- "*Section 1.2:*" *(Water-tight containers)*
  Page 9, Section 3.4, paragraph 3, sentence 2.

- *"Section 1.3:" (Chemical Analysis of wastewater)*
  Page 8, Section 3.3.3 states that the wastewater will be chemically analyzed but does not specify the analytical methods. Wastewater will be analyzed pursuant to methods specified in your January 16, 1995 memorandum.

- *"Excavation:" (Storage of groundwater encountered during excavation)*
  Page 10, Section 3.4, paragraph 3 describes why groundwater will not be encountered during excavation. Therefore measures to store and test groundwater are not needed.

- *"Section 3.1:" (Clean Fill Excavation and Stockpiling)*
  The referenced figures were included in the Excavation and Sampling Plan (Figures 1, 1a and 2).

Drum Storage Area

- *"Description of what has been done to verify the hit of organic lead in PB 5.3"*
  Verification of this result was not provided in the Excavation and Sampling Plan. Inchcape has informed us that they have a 95% confidence level in the sample result. We have instructed them to review their raw data from the sample and forward to you a statement of their findings. We have proceeded with the belief that this sample result is valid. We have reviewed this sample result with your toxicologist, Steve Dezio, and have concluded that this sole detected concentration of organolead below the black clay layer does not constitute a potential threat to health or the environment. However, we will collect additional samples from the vicinity of this location from the bottom of the excavation to confirm the existence of the organolead. If the organolead is found to exist we will excavate additional quantities of soil and collect additional post-excavation samples.

- *"Results of any total chromium analysis on any of the HS samples."*
  With the exception of SH3 and SH7 in the SDSA, the SH samples were only analyzed for hexavalent chromium, not total chromium. The total chromium data for these two samples is provided in summary Tables 2, 3 and 4. Based comments you provided to RUST and P.E.S. Environmental personnel in the January 24, 1995 project meeting, it was our understanding that total chromium would be tested for only if hexavalent chromium were detected.

- *"A cross section is needed through PB 9, DSA-HA 9a."*
  Not included in Excavation and Sampling Plan. Will be provided by February 21, 1995.

- *"Results of HS samples run for VOCs & TPH..."*
  Page 2, paragraph 4 provides reasoning that the perimeter (HS) samples in the DSA were

analyzed for TPH but not for VOCs or SVOCs. Page 3, paragraph 4 provides reasoning why the perimeter (HS) samples in the SDSA were not analyzed for VOCs or TPH.

- *"Where confirmation soil samples will be taken. This shall include soil samples under the concrete along cross section D-D'."*
  Figure 5 of the Excavation and Sampling Plan provides a plan view of post excavation sampling locations in the DSA.

Solder Dross Area

"Analytical results for VOCs and TPH on all soil samples."
Not all samples were analyzed for VOCs and TPH as described above. Analytical results for all samples collected and analyzed are included in the Excavation and Sampling Plan.

The remainder of this letter provides responses to comments you forwarded to me in two voice mail messages on February 16, 1995, at approximately 7 p.m. Eastern time.

Post excavation sampling and analysis plan

You stated that it was not clear what we mean by grab sample, and that you do not want us collecting grab samples because we will loose volatiles.
Grab samples (the type of all post-excavation samples we propose to collect) are discrete aliquots of soil that are representative of one location (i.e.; one sample per one location), not grabbed from the surface. Page 12, Section 4.3, sentence 2 states that they will be from a depth of 6-12 inches below the excavation surface. This demonstrates our intent to collect all post excavation samples from undisturbed soil. Samples will be collected with a proper sampling device (stainless steel liner driven into undisturbed soil).

DSA

You stated that we must collect post excavation samples in the wall of the DSA excavation.
We had not intended to collect wall samples around the perimeter of the DSA excavation. Reasoning for this was presented on Page 12, last paragraph. However, we understand your concern that the HS series samples were not analyzed for VOCs. Therefore, we agree to collect wall samples (one per 20 lineal feet of wall should be adequate) around the perimeter of the DSA excavation as you requested.

You ask that all analyses be performed on all post-excavation samples, including the analytes for which we have established performance standards and for the VOCs we missed before.
Page 13, Section 4.4 of the Excavation and Sampling Plan specifies that **all** post-excavation samples will be analyzed for "volatile organic compounds by EPA SW-846 Method 8260 with a

library search for tentatively identified compounds, EPA Method 8270 with TICs, TPH as Diesel (Cal DHS Method), TPH as Mineral Spirits (Cal DHS Method), and Organo-lead (Cal DHS Method). The inorganic analytes to be tested for will include: total lead and total zinc by EPA Method 6010 and hexavalent chromium by EPA Method 7196A".

You stated that there are to be no composite wall samples.
The 4 sample locations shown on Figure 5 of the Excavation and Sampling Plan will be collected and analyzed as discrete individual samples as you have requested, not composite samples as proposed.

SDSA
You ask that 11 post excavation samples be collected in the SDSA.
We proposed to excavated two small areas of soil in the vicinity of samples SH1 and SH6. We understood that previous sampling was adequate to determine that soil beneath the concrete pad would not have to be excavated, so we do not see the need for collecting post excavation samples of that material. We would like to discuss further with you the need to collect and analyze 11 samples in the SDSA.

You ask that all samples be all analyses be performed on all post-excavation samples, including the analytes for which we have established performance standards and for the VOCs we missed before.
Please refer to Page 13, Section 4.4 of the Excavation and Sampling Plan. We propose to analyze all post-excavation samples for all analytes for which we have performance standards, including all VOCs.

At the end of your second message, you state that because of the gaps in data, we should just excavate down to 9 feet in the DSA and a foot or two down in the SDSA to assure clean closure. You specify gaps in data including organics and hexavalent chromium.
We do not believe we have substantive data gaps that would prevent excavation and removal of all contaminated soil that exceeds performance standards, to be confirmed by post-excavation sampling and analysis.

Following my conversation with Rob Creps wherein he passed on to me comments given to him by you, I reviewed our submittals and realize that we neglected to provide you with summary tables of alcohol analyses performed on SDSA samples collected in October 1994. These tables will be provided on February 21, 1995, along with our other submittals. These tables will show that alcohols were not detected in samples collected from PB-10, PB-11R, PB-12, and PB-13. The laboratory analytical reports for these analyses were included in Volume 2 of the December 8, 1994, report entitled, "Analytical Results, RCRA Storage Areas Closure" submitted to you on that date.

Please call me with further comments or questions.

Very truly yours,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

cc: J. Moran, Esq., ANC
J. Peters, ANC
E. Rawlings, ANC
J. Kessler, HSA
R. Creps, PES
R. Williams, Kmart
D. Bruegel, Esq., Dickinson, Wright
R. Arulananthum, SFBRWQCB
B. Chan, ACDEH

RUST ENVIRONMENT & INFRASTRUCTURE

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95 FEB 16 PM 9:12

February 15, 1995

Sumadhu Arigala
Water Resources Control Engineer
San Francisco Bay Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

Barney Chan
Hazardous Materials Specialist
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, CA 94502

Subject: Outline - Sitewide Risk Management Plan
Former American National Can Company Facility
Oakland, California

Gentlemen:

This letter presents an outline prepared for American National Can Company (ANC) by Rust Environment and Infrastructure (RUST) for the proposed Sitewide Risk Management Plan (SRMP) for the subject facility.

OUTLINE: SITEWIDE RISK MANAGEMENT PLAN

1.0 INTRODUCTION

Land Use Information

2.0 SITE BACKGROUND AND CONDITIONS

2.1 Area 2

Former Heating Oil UST.

Remedial activities included removal and off-site disposal of the UST, and impacted soil to

below groundwater. Excavation was backfilled with clean imported soil. Detailed activities are presented in the Area 2 Remedial Activities Report and report of UST removal. The former excavation area will be covered with asphalt and serve as a parking lot for a commercial retail center.

2.2 Area 3

Groundwater flow onto the site from a direction opposite to the regional groundwater flow has impacted Area 3 groundwater from an off-site source with free and dissolved phases of a mixture of petroleum and chlorinated compounds, some of which contain PCB's. The regional groundwater flow component has limited the extent to which impacted groundwater has migrated onto the subject property and also redirects the impacted groundwater back to the suspected source property.

Remedial activities have included product removal from wells and the evacuation and sealing of underground sumps on the adjacent Ekotek Lube Property.

A monitoring program is being performed to determine the effectiveness of the Ekotek Lube remedial measures.

Area 3 will be covered with asphalt and will serve as a parking lot for a commercial retail center.

2.3 Area 4

Former UST and underground pipeline area. UST's were removed in 1987 and 1993.

Recent remedial activities included removal and off-site disposal of residual impacted soil not removed during the 1987 UST removal, and the removal and off-site disposal of excavation groundwater. The excavation was backfilled with clean imported soil. Detailed results are presented in the Area 4 Remedial Activities Report.

2.4 DSA/SDSA RCRA Units

History of RCRA Units.

Remedial activities associated with RCRA closure.

3.0 ASSESSMENT OF POST CONSTRUCTION HUMAN HEALTH AND ENVIRONMENTAL RISKS

3.1 Area 2 Soil

3.1.1 Exposure Pathways:

The current exposure pathways are Ingestion, Inhalation and Dermal Contact:

The current exposure pathways are not a concern. The Area 2 Soils remedial activities reports demonstrate that the concentrations of residual soil contamination remaining is very low, and

well below health based clean up levels for industrial or residential soil.

After construction, there will be no exposure pathways, unless there is a change in land use, as the area will be covered by an asphalt parking lot.

3.1.2 Receptors:

After construction, there will be no receptors as the area will be covered by asphalt.

3.2 Area 2 Groundwater

3.2.1 Exposure Pathways: None

Usage of any groundwater from the site is prohibited by a deed restriction.

The dense and relatively impermeable nature of the soil (clay and silt) that was contaminated prevented any significant downgradient migration of a groundwater plume.

Any plume that may be present will have its origin on the upgradient side of the site.

Concentrations of contaminants in a groundwater plume will attenuate before reaching the downgradient site boundary.

3.2.2 Receptors: None.

As presented in Section 3.2.1.

3.3 Area 3 Soil

3.3.1 Exposure Pathways:

The current exposure pathways are Ingestion, Inhalation and Dermal Contact:

After construction, there will be no exposure pathways, unless there is a change in land use, as the area will be covered by an asphalt parking lot.

3.3.2 Receptors:

After construction, there will be no receptors as the area will be covered by asphalt.

3.4 Area 3 Groundwater

3.4.1 Exposure Pathways: None

Usage of any groundwater from the site is prohibited by a deed restriction.

3.4.2 Receptors: None

As presented in Section 3.4.1.

3.5 Area 4 Soil

3.5.1 Exposure Pathways:

The current exposure pathways are Ingestion, Inhalation and Dermal Contact.

The current exposure pathways are not a concern. The Area 4 Soils remedial activities reports demonstrate that the concentrations of residual soil contamination remaining is very low, and well below health based clean up levels for industrial or residential soil.

After construction, there will be no exposure pathways, unless there is a change in land use, as the area will be covered by an asphalt parking lot.

3.5.2 Receptors:

After construction, there will be no receptors as the area will be covered by asphalt.

3.6 Area 4 Groundwater

3.6.1 Exposure Pathways: None

Usage of any groundwater from the site is prohibited by a deed restriction.

Groundwater monitoring data shows that the contaminant plume is currently contained on the property.

3.6.2 Receptors: None.

As presented in Section 3.6.1

3.7 DSA/SDSA RCRA Units

3.7.1 Exposure Pathways:

The current exposure pathways are Ingestion, Inhalation and Dermal Contact.

After construction, there will be no exposure pathways, unless there is a change in land use, as the area will be covered by an asphalt parking lot.

3.7.2 Receptors:

After construction, there will be no receptors as the area will be covered by asphalt.

4.0 RISK MANAGEMENT MEASURES

4.1 Area 2 Soil

No management measures necessary.

4.2 Area 2 Groundwater

A deed restriction has been instituted for the entire site that prevents the usage of groundwater.

Implement a groundwater monitoring plan following the completion of Area 2 remedial activities.

Demonstrate that any residual groundwater pollution plume that may be present following the completion of Area 2 remedial activities is "contained" (shows no increasing trends at the compliance points) in the agreed upon "containment area". Significant downgradient migration will be defined at the containment monitoring point wells by the deviation from the mean or average of the first four quarters of monitoring for those wells very near the areas of soil excavation and by deviation from historical data for those wells farther away.

Demonstrate that groundwater quality in the designated "containment" area does not degrade from the quality established following the completion of Area 2 remedial activities.

A health and safety plan has been developed that will be used to protect workers actively participating in groundwater monitoring programs.

4.3 Area 3 Soil

No management measures necessary.

4.4 Area 3 Groundwater

A deed restriction has been instituted for the entire site that prevents the usage of groundwater.

Implement a groundwater monitoring plan to:

1. Monitor the groundwater pollution emanating from the Ekotek Lube property onto the site; + offsite.
2. Monitor the position and dimension of the groundwater mound emanating from the Ekotek Lube property; and,
3. Monitor the groundwater quality in the designated area.

A health and safety plan has been developed that will be used to protect workers actively participating in groundwater monitoring programs.

4.5 Area 4 Soil

No management measures necessary.

4.6 Area 4 Groundwater

A deed restriction has been instituted for the entire site that prevents the usage of groundwater for any purposes other than environmental monitoring.

Implement a groundwater monitoring plan following the completion of Area 4 remedial activities.

Demonstrate that any residual groundwater pollution plume that may be present following the completion of Area 4 remedial activities is "contained" (shows no increasing trends at the compliance points) in the agreed upon "containment area". Significant downgradient migration will be defined at the containment monitoring point wells by the deviation from the mean or average of the first four quarters of monitoring for those wells very near the areas of soil excavation and by deviation from historical data for those wells farther away.

Demonstrate that groundwater quality in the designated "containment" area does not degrade from the quality established following the completion of Area 4 remedial activities.

A health and safety plan has been developed that will be used to protect workers actively participating in groundwater monitoring programs.

4.7 DSA/SDSA RCRA Units Soil

After remediation, no management measures will be necessary.

4.8 DSA/SDSA RCRA Units Groundwater

A deed restriction has been instituted for the entire site that prevents the usage of groundwater for any purposes other than environmental monitoring.

Implement a groundwater monitoring plan following the completion of remedial activities.

5.0 MONITORING PROGRAM

A groundwater monitoring program will be performed in Area 2, Area 3, Area 4, and the DSA/SDSA to ensure that any residual groundwater pollution remains "contained."

Field methods and procedures for the installation, development, and sampling of monitoring wells will be included as an appendix to the Risk Management Plan.

5.1 Area 2

— need one upgradient near E 8th ?

Monitoring Points will consist of re-installation of monitoring well TW-1 to monitor the source area, installation of one monitoring well downgradient of TW-1, and monitoring of existing MW-13, reinstalled TW-1, and the new downgradient well.

All groundwater samples will be analyzed for TPHd (California LUFT Method). Groundwater samples from reinstalled TW-1 will be analyzed for BTEX; if results are non-detect at LUFT detection limits, BTEX analyses will be discontinued.

Each well will be sampled on a quarterly basis for a period of two years, unless four consecutive

PES Environmental, Inc.
Engineering & Environmental Services

MEMORANDUM

TO: See Distribution List (by facsimile)

FROM: Robert Creps, PES Environmental, Inc. RSC

DATE: February 16, 1995

SUBJECT: Meeting regarding environmental issues at former American National Can Company, Oakland, California Facility

---

This memorandum is to invite and encourage each of you to attend the next meeting regarding environmental issues at the former ANCC Oakland Facility. The meeting will be held at 1:00 pm on Thursday, February 23, 1995, at the Cal/EPA Toxic Substances Control Board office located at 700 Heinz Avenue, Suite 200 in Berkeley, California.

Our agenda will not be rigid; rather, we will discuss the progress and status of various environmental activities, including:

(1) Remediation of Areas 2 and 4;
(2) Preparation of the Site-wide Risk Management Plan;
(3) Preparation of Closure Plan documents for the RCRA storage area; and
(4) Agency authorization of removal of the storage units and the schedule of the work.

The last two items are of particular importance because of Kmart's construciton start date of March 1, 1995. By having all parties present, we can flush out and resolve any remaining issues related to the closure of the RCRA units.

I would appreciate if each of you would confirm your attendance by either faxing me your confirmation at (415) 899-1601; or calling me at (415) 899-1600 (leave a voice message if needed).

Thank you.

Distribution: Dan Murphy - DTSC Facility Permitting
Steve Krival - DTSC Facility Permitting
Ravi Arulanantham - RWQCB
Sum Arigala - RWQCB
Barney Chan - Alameda Co. Health
✓Joe Moran - American National Can Co.
✓Ed Alusow - RUST E&I
Richard Burzinski - RUST E&I
Jim Kessler - High Street Associates
Rich Williams - Kmart Corporation
Scott Wilson - Kmart Corporation
David Bruegel - Dickinson, Wright, et al

Speaker Phone

1682 Novato Boulevard • Suite 100 • Novato, California 94947 • (415) 899-1600 • FAX (415) 899-1601

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Thank you.

Distribution: Dan Murphy - DTSC Facility Permitting
Steve Krival - DTSC Facility Permitting
Ravi Arulanantham - RWQCB
Sum Arigala - RWQCB
Barney Chan - Alameda Co. Health I'll be there, BChan
Joe Moran - American National Can Co.
Ed Alusow - RUST E&I
Richard Burzinski - RUST E&I
Jim Kessler - High Street Associates
Rich Williams - Kmart Corporation
Scott Wilson - Kmart Corporation
David Bruegel - Dickinson, Wright, et al

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1682 Novato Boulevard • Suite 100 • Novato, California 94947 • (415) 899-1600 • FAX (415) 899-1601

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RUST ENVIRONMENT & INFRASTRUCTURE

95 FEB 16 AM 9:13

RUST Environment & Infrastructure Inc.
12 Metro Park Road
Albany, NY 12205
Tel. (518) 458-1313 • FAX (518) 458-2472

February 15, 1995

Steve Krival, M.S.
Hazardous Substances Specialist
CAL-EPA, DTSC, Region 2
700 Heinz Avenue, Suite 200
Berkeley, California 94502

Subject: Errata Package to the Excavation and Sampling Plan
Former American National Can Company Facility
Oakland, California

Dear Mr. Krival:

It has come to our attention that the Supplement to the Draft Final Closure Plan that you should have recieved via Federal Express today did not include Anametrix's laboratory data package for TPHd, TPH as mineral spirits and total lead analyses performed on sixteen perimeter samples collected in the Drum Storage Area. This report, including the data for both "a" and "b" designated samples from perimeter borings DSA HS-1 through HS-8 is attached.

In review of this analytical package, we have identified that Table 2 of the report provided to you contained four transcription errors. In particular, please note that the 56 mg/kg (ppm) concentration of TPHd that was reported in sample DSA-HS3a was actually not detected at the reporting limit of 10 mg/kg (ppm). As a result of this, Figures 1 and 1a of the report, which show the proposed limits of excavation to include sample DSA HS-3a have also been revised. The additional corrections to Table 2 include: DSA-HS2b - 38.5 mg/kg total zinc; DSA-HS10a - 184 mg/kg total zinc; and DSA-HS13a - 83.8 mg/kg total lead. These corrections will not affect the limits of excavation. The revised Table 2 and Figures 1 and 1a are also included with this letter.

We apologize for these oversights. Please incorporate these corrections where necessary. If you have any questions or comments, please do not hesitate to contact me at (518) 458-1313.

Sincerely,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

Enclosures

cc: J. Moran, Esq., ANC
J. Peters, ANC
E. Rawlings, ANC
J. Kessler, HSA
R. Creps, PES
R. Williams, Kmart
D. Bruegal, Esq., Dickinson, Wright
R. Arulananthum, SFBRWQCB
B. Chan, ACDEH

RUST ENVIRONMENT & INFRASTRUCTURE

RUST Environment & Infrastructure Inc.
12 Metro Park Road
Albany, NY 12205
Tel. (518) 458-1313 • FAX (518) 458-2472

February 14, 1995

Steve Krival, M.S.
Hazardous Substances Scientist
CAL-EPA, DTSC, Region 2
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2737

Dear Mr. Krival:

Subject: Excavation and Sampling Plan
Supplement to Draft Final Closure Plan
Former American National Can Facility
Oakland, California
EPA Identification No. CAD 009 162 116

Enclosed are two (2) copies of the subject document. We have prepared this Plan utilizing your helpful letter to Joe Moran dated February 11, 1995, as guidance. In the interests of timeliness, however, we have not included a map showing the concentration contours in the two storage areas, since they would require time to prepare, and we do not want to hold up this Plan longer than necessary. We will endeavor to prepare graphic depictions of the contaminants for you by the end of this week. The limits of planned excavation shown on the enclosed figures were drawn to encompass all contiguous contaminated soil areas, and it is our intent to excavate to those limits, or beyond if required by post-excavation sampling results.

Please be assured, however, that American National Can Company (ANC) and Rust Environment & Infrastructure (RUST) are committed to a clean closure at this site. Accordingly, this Plan is designed to ensure the excavation of any contaminated soil which could pose a potential risk to the public health or the environment. We agree with your DTSC toxicologist, Steve Dezio, that low concentrations of contaminants identified sporadically in samples isolated from the storage areas and from groundwater are not a threat. But the concrete and soils of the storage areas that are deemed a potential health risk or a threat to environmental quality will be removed and disposed of in accordance with all applicable laws and regulations.

The Revised Health and Safety Plan for the RCRA Closure Activities is being reviewed and will be updated as necessary prior to the initiation of excavation activities. The Health and Safety Plan for construction activities is being prepared by Kmart. They have stated that it will be completed prior to their beginning site activities.

RUST and ANC appreciate your efforts in providing regulatory oversight in a timely manner, and thank you for your assistance in developing this Plan. If we can be of any assistance during your review of this or other documents, please do not hesitate to call on us.

Very truly yours,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

Enclosures

cc: J. Moran, Esq., ANC
J. Peters, ANC
E. Rawlings, ANC
J. Kessler, HSA
R. Creps, PES
R. Williams, Kmart
D. Bruegel, Esq., Dickinson, Wright
R. Arulananthum, SFBRWQCB
B. Chan, ACDEH

RUST ENVIRONMENT & INFRASTRUCTURE

Recd 2/9/95 BC

February 3, 1995

RUST Environment & Infrastructure Inc.
12 Metro Park Road
Albany, NY 12205
Tel. (518) 458-1313 • FAX (518) 458-2472

VIA FACSIMILE

Mr. Barney Chan
Hazardous Material Specialist
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway
Alameda, California 94502

Subject: Errata to Building 12 Soil Investigation and Remediation Activities Report
Former American National Can Company Facility
Oakland, California

Dear Mr. Chan:

It has come to our attention that our recent report, "Soil Investigation and Remediation Activities Report, Former ANC Facility - Building 12, Oakland, California," did not include details of the specific depths from which the post-excavation soil samples were collected. The following information provides the details that were inadvertently omitted from Section 3.0 of the report.

Post Excavation samples B12-1, B12-2, B12-3, and B12-4 were collected at intervals of 20 feet along the excavation walls, at respective depths of 7.5, 6.0, 5.5 and 6.0 feet below the pre-excavation surface grade. Floor sample B12-5 was collected at the bottom of the excavation, at a depth of 8 feet below surface grade. With the exception of B12-4, the samples were collected from an olive to yellow brown silty clay. Soils sample B12-4 was collected from a silty gravel with sand.

Please contact me at (518) 458-1313 if you have any questions regarding this information or the report in general.

Sincerely,

Walter O. Howard /for

Edward W. Alusow
Senior Project Manager

cc: J. Moran (ANC)
J. Peters (ANC)
E. Rawlings (ANC)
J. Kessler (HSA)
D. Bruegel (Dickinson Wright)
R. Creps (PES)
R. Arulananthum (SFBRWQCB)
R. Williams (KMART)
S. Arigala (SFBRWQCB)
S. Krival (DTSC)

RUST ENVIRONMENT & INFRASTRUCTURE

RUST Environment & Infrastructure Inc
12 Metro Park Road
Albany, NY 12205
Tel. (518) 458-1313 • FAX (518) 458-2472

February 1, 1995

Mr. Barney Chan
Hazardous Materials Specialist
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway
Room 250
Alameda, California 94502

Subject: Building 12
Former American National Can Company Facility
Oakland, California

Dear Mr. Chan:

Enclosed please find a copy of our Building 12 Soil Investigation and Remediation Activities Report for the referenced site.

If based on the information provided in this document, you agree that the impacted soil in this area has been remediated to the satisfaction of the Alameda County Department of Environmental Health, please indicate your agency's approved closure in a letter to my attention.

If you have any questions regarding this report, please contact me at 518-458-1313.

Very truly yours,

Walter O. Howard/for

Edward W. Alusow
Senior Project Manager

ESA/ajl
Enclosure
cc: J. Moran (ANC)
J. Peters (ANC)
E. Rawlings (ANC)
J. Kessler (HSA)
D. Bruegel (Dickinson Wright)
R. Creps (PES)
R. Arulananthum (SFBRWQCB)
R. Williams (KMART)
S. Arigala (SFBRWQCB)
S. Krival (DTSC)

AMERICAN NATIONAL CAN COMPANY
Oakland, California

SITEWIDE RISK MANAGEMENT PLAN

1.0 INTRODUCTION
Land Use Information

2.0 SITE BACKGROUND AND CONDITIONS

2.1 Area 2

** Former Heating Oil UST.*

** Remedial activities included removal and off-site disposal of the UST, and impacted soil to below groundwater. Excavation was backfilled with clean imported soil. Detailed activities are presented in the Area 2 Remedial Activities Report and report of UST removal.*

** The former excavation area will be covered with asphalt and serve as a parking lot for a commercial shopping center.*

2.2 Area 3

** Groundwater flow onto the site from a direction opposite from the regional groundwater flow has impacted Area 3 groundwater from an off-site source with free and dissolved phases of a mixture of petroleum and chlorinated compounds, some of which contain PCBs. The regional groundwater flow component has limited the extent to which impacted groundwater has migrated onto the subject property and also redirects the impacted groundwater back to the suspected source property.*

** Remedial activities have included product removal from wells and the evacuation and sealing of underground sumps on the adjacent Ekotek Lube Property.*

** A monitoring program is being performed to determine the effectiveness of the Ekotek Lube remedial measures.*

** Area 3 will be covered with asphalt and serve as a parking lot for a commercial shopping center.*

2.3 Area 4

** Former UST and underground pipeline area. USTs were removed in 1987 and 1993.*

** Recent remedial activities included removal and off-site disposal of residual impacted soil not removed during the past UST removal, and the removal and off-site disposal of excavation groundwater. Excavation was backfilled with clean imported soil. Detailed results are presented in the Area 4 Remedial Activities Report*

3.0 ASSESSMENT OF HUMAN HEALTH AND ENVIRONMENTAL RISKS

3.1 Area 2 Soil

3.1.1 Exposure Pathways:

** Ingestion, Inhalation and Dermal Contact: By site workers during construction activities.*

**The current exposure pathways are not a concern. The Area 2 Soils remedial activities reports demonstrate that the concentrations of residual soil contamination remaining is very low, and well below health based clean up levels for industrial or residential soil.*

** After construction, there will be no exposure pathways, unless there is a change in land use, as the area will be covered by an asphalt parking lot.*

3.1.2 Receptors:

** Site workers involved in construction activities.*

** After construction, there will be no receptors as the area will be covered by asphalt.*

3.2 Area 2 Groundwater

3.2.1 Exposure Pathways: *None*

** Usage of any groundwater from the site is prohibited by a deed restriction.*

**The dense and relatively immpermeable nature of the soil (clay and silt) that was contaminated prevented any significant downgradient migration of a groundwater plume.*

**Any plume that may be present will have its origin on the upgradient side of the site.*

Concentrations of contaminants in the groundwater plume will attenuate before reaching the downgradient site boundary.

3.2.2 Receptors: *None.*

**As presented in Section 3.2.1*

3.3 Area 3 Soil

3.3.1 Exposure Pathways:

**Ingestion, Inhalation and Dermal Contact: By site workers during construction activities.*

**After construction, there will be no exposure pathways, unless there is a change in land use, as the area will be covered by an asphalt parking lot.*

3.3.2 Receptors:

**Site workers involved in construction activities.*

** After construction, there will be no receptors as the area will be covered by asphalt.*

3.4 Area 3 Groundwater

3.4.1 Exposure Pathways: *None*

- do we need up gradient well?
- do we need a well w/i 10' of tank excavation?
- has gradient been adequately verified?

Area 2

** Usage of any groundwater from the site is prohibited by a deed restriction.*

3.4.2 Receptors: *None*
** As presented in Section 3.4.1.*

3.5 Area 4 Soil

3.5.1 Exposure Pathways:
**The current exposure pathways are Ingestion, Inhalation and Dermal Contact by site workers during construction activities.*
**The current exposure pathways are not a concern. The Area 4 Soils remedial activities reports demonstrate that the concentrations of residual soil contamination remaining is very low, and well below health based clean up levels for industrial or residential soil.*
**After construction, there will be no exposure pathways, unless there is a change in land use, as the area will be covered by an asphalt parking lot.*

3.5.2 Receptors:
**Site workers involved in construction activities.*
**After construction, there will be no receptors as the area will be covered by asphalt.*

3.6 Area 4 Groundwater

3.6.1 Exposure Pathways: *None*
** Usage of any groundwater from the site is prohibited by a deed restriction.*
** Groundwater monitoring data shows that the contaminant plume is currently contained on the property.*

3.6.2 Receptors: *None.*
**As presented in Section 3.6.1*

4.0 RISK MANAGEMENT MEASURES

4.1 Area 2 Soil
** No management measures necessary.*

4.2 Area 2 Groundwater
** A deed restriction has been instituted for the entire site that prevents the usage of groundwater.*
** Implement a groundwater monitoring plan immediately following the completion of Area 2 remedial activities.*
** Demonstrate that the residual groundwater pollution plume that may be present following the completion of Area 2 remedial activities is "contained" (shows no significant downgradient migration) in the agreed upon "containment area".*

** Demonstrate that groundwater quality in the designated "containment" area does not degrade from the present quality.*
** A health and safety plan has been developed that will be used to protect workers actively participating in groundwater monitoring programs.*

4.3 Area 3 Soil

** No management measures necessary.*

4.4 Area 3 Groundwater

** A deed restriction has been instituted for the entire site that prevents the usage of groundwater.*
** Implement a groundwater monitoring plan to*

1. demonstrate that the groundwater pollution emanating from the Ekotek Lube property onto the site is "contained" in its current position;
2. demonstrate that the groundwater mound at the Ekotek Lube property line is disappearing.
3. Demonstrate that groundwater quality in the designated "containment" area does not degrade from the quality established

** A health and safety plan has been developed that will be used to protect workers actively participating in groundwater monitoring programs.*

- do we need offsite wells on E grass?

4.5 Area 4 Soil

** No management measures necessary.*

4.6 Area 4 Groundwater

** A deed restriction has been instituted for the entire site that prevents the usage of groundwater for any purposes other than environmental monitoring.*
** Implement a groundwater monitoring plan immediately following the completion of Area 4 remedial activities.*
** Demonstrate that any residual groundwater pollution plume that may be present following the completion of Area 4 remedial activities is "contained" (shows no significant downgradient migration) in the agreed upon "containment area". Significant downgradient migration will be defined at the containment monitoring point wells where evidence of the maintenance of groundwater quality within California DHS drinking water standards for the contaminants of concern (e.g.; xylenes less than 1750 ug/l and ethylbenzene less than 680 ug/l) will be required.*
** Demonstrate that groundwater quality in the designated "containment" area does not degrade from the quality established following the completion of Area 4 remedial activities.*
** A health and safety plan has been developed that will be used to protect workers actively participating in groundwater monitoring programs.*

- What parameters should be monitored? To verify the adequacy of existing downgradient well.
- Do we need to add any metals Cr, Cr VI, Pb, Zn in QM spring?

5.0 MONITORING PROGRAM

A groundwater monitoring program will be performed in Area 2, Area 3, and Area 4 to ensure that any residual groundwater pollution remains "Contained".
Field methods and procedures for the installation, development and sampling of monitoring wells will be included as an appendix to the Risk Management Plan.

6.0 CONTINGENCY OPTIONS

Contingency options for all areas will be evaluated if the agreed upon levels are exceeded at the Containment Monitoring Points. Possible contigency options will include:

1. Performance of a more detailed/focused assessment of health and environmental risks;
2. Additional groundwater monitoring;
3. Evaluation/Implementation of groundwater remediation.

4. H+S plan for construction workers.

MEETING AGENDA

JANUARY 13, 1995

FORMER AMERICAN NATIONAL CAN COMPANY FACILITY
OAKLAND, CALIFORNIA

I. INTRODUCTION AND DISCUSSION OF MEETING OBJECTIVES

II. STATUS OF KMART DEVELOPMENT - CONSTRUCTION SCHEDULE

III. SITE-WIDE RISK MANAGEMENT AND MONITORING PROGRAM

IV. STATUS OF REMEDIATION AND CLOSURE ACTIVITIES

V. SUMMARY AND SCHEDULE OF UPCOMING ACTIVITIES / MEETINGS

Agenda

American National Can site (Proposed K Mart facility), Oakland. Meeting at RWQCB, Oakland, California, 1/13/95.

I. Summary of past environmental activities

1. UST and Building 12 (solvent area on the east side of the property) related issues
2. Area 3 Baseline Health Risk Assessment
3. RCRA storage facilities

II. Environmental activities currently in progress

1. Draft closure workplan for RCRA storage facilities

III. Future work necessary for environmental site compliance

1. Soil
2. Groundwater
3. Non-attainment area, health and environmental risk management plan

Meeting at the RWQCB, #2, regarding ANC Site Oakland. 1/12/95

Name	Organization	phone number
Sum Arigala	RWQCB #2	(510) 286 0434
Ravi Arulanantham	RWQCB #2/ACDEH	286-1331
Edward W. Alusow	RUST E+I	518-458-1313
David R. Brueger	Dickinson Wright (Kmart atty)	810-433-1272
Richard G. Williams	Kmart Corp. Hdqts.	810-637-4411
Robert S. Greps	PES Environmental, Inc.	415-899-1600
James M. Kessler	The Martin Group	(415) 772-5900
Richard Burzinski	RUST E&I-San Jose	(408) 232-2800
Barney Chan	ACEH LOP	(510) 567-6765
Joe Moran	American National Can	(312) 399-3658 Chicago (office).

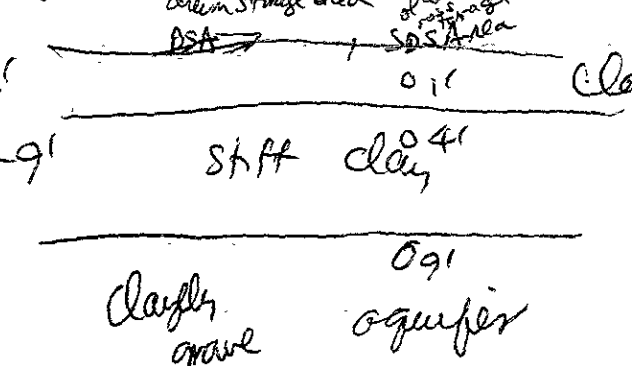
1/12/95 Update Meeting on former ANC site

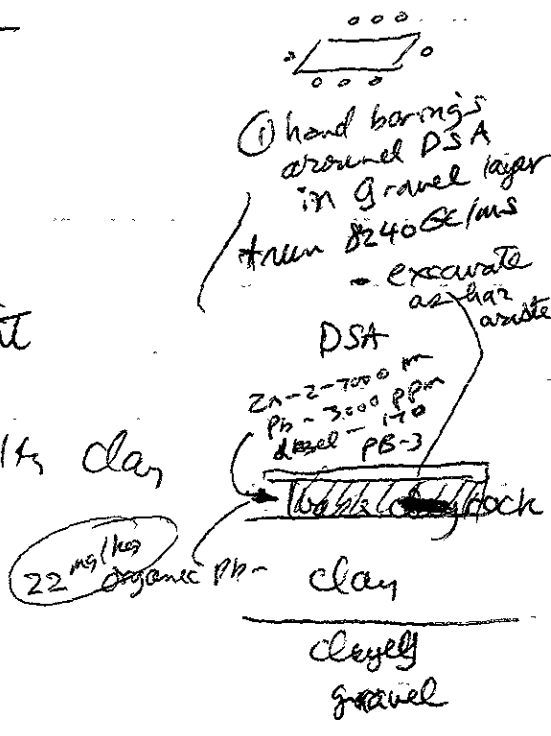
Sum Arngale — Joe Mora
Ravi — R. Berzinsky
Ed Alusow — J. Kessler
David Bruegel
Richard Williams
Rob Kapps

- 2 areas interim TSD areas. - still addnl up given to DTSC - S. Krival

- Area 2+4 - descriptive activities, analytical results + soils + waters disposal W.P.
verification monitoring W.P.

~ 4000 cyds spoils





Look for 1/95 Draft Final Closure Plan
Am. Nat. Can Co. 3801 E 8th St

- Dames + Moore Report ? Cr.? Pb? Zn?
- grab GW specimen for total Cr / hex. Cr, Pb(?)

Area 2: by Wed next week

Pulling on Monday – Areas
All 3 reports 2, 4 + Bld 12
S/B. submitted by ~ Jan 25, 1995

By 31st of Jan – outline of Site Mgmt plan

Meeting again Jan 31st 930 am

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J KEARS Agency Director

RAFAT A SHAHID, Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Environmental Protection Division
1131 Harbor Bay Parkway, #250
Alameda, CA 94502-6577
(510) 567-6700

January 10, 1995

Update on American National Can Site
To determine whether this site has followed the guidelines of the December 30,1993 letter from the RWQCB giving conditional work approval for the investigation and development of site.

Point 1- **All sampling and remediation activities shall be co-ordinated with staff of ACDEH. All appropriate tank closure permits and monitoring well closure permits should be obtained from ACDEH and Zone 7 respectively.**

ACDEH received, approved and was present to witness the removal of the formerly closed in-place diesel tank in Area 2. No further contact has occurred since the tank removal therefore I assume that no further sampling was taken subsequent to the 12/2/94 tank removal. No tank closure report submitted as yet.

Need to submit a tank closure report, schedule confirmatory soil sampling and dispose of contaminated soils.

ACDEH was not notified prior to the excavation of soils in Area 4, the former UST and product pipeline area. We were contacted by E. Alusow verbally and received a faxxed copy of soil overexcavation results on November 21, 1994.

Need a complete report of excavation activities including a sampling map, a description of activities and chain of custody documents for the samples. Excavated soils must be dealt with in your future work plans/reports.

ACDEH was not notified prior to the overexcavation and soil sampling of the solvent storage area, Building 12. The overexcavation occurred on Sept 27, 1994 and our office received a faxxed copy of the soil results in a Nov 17, 1994 report. We also received a November 18, 1994 fax of RUST report detailing the results of additional post excavation samples, B12-1 through B12-5.

Need a complete report particularly chain of custody documents and a description of sample locations. There are concerns that the soil sample detecting 1700 ppm mineral spirits was taken at 6.5′ bgs and all other samples above this depth. Need to address soil disposition and replace monitoring well MW-1 destroyed during the excavation.

The co-ordination with ACDEH should include pre-notification of activities to allow for on-site witnessing of confirmatory soil sampling. Typically, **48 working hours notice is required.** I met with Mr. Burzinsky of Wahler Associates and specified this to him. It has been repeated to Mr. Alusow also.

Point 2- All post excavation soil verification results shall be sent to ACDEH. Although the soil verification results have been sent to our office the rest of the excavation report is missing eg sampling map, chain of custody document, narrative and conclusion and recommendation from the consultant.

Point 3- A technical report and review whether any risk assessment is required for residual contamination. This should be investigated in the report addressing point 4.

Point 4- Water quality verification monitoring plan required. Additional on- and offsite wells may be required to delineate the GW plume and to replace those wells destroyed during the excavation.

RUST ENVIRONMENT & INFRASTRUCTURE

RUST Environment & Infrastructure Inc.
12 Metro Park Road
Albany, NY 12205
Tel. (518) 458-1313 • FAX (518) 458-2472

January 6, 1995

Barney Chan
Hazardous Materials Specialist
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, CA 94502

Dear Mr. Chan:

Subject: Building #12 Contamination
Former ANC Oakland Facility

This letter is a request for closure of the area of contamination at the subject site. As was presented in the letter to Joe Moran dated October 25, 1994, which was forwarded to you under cover of a letter to you dated November 17, 1994, a subsurface investigation was conducted in the area of concern which consisted of the emplacement of a number of soil borings and the collection of soil samples. The analytical results from those samples were used to characterize, and to delineate the extent of, a limited volume of soil contaminated with low levels of mineral spirits.

A letter to Mr. Moran dated November 18, 1994, and copied to you, summarized the activities that completed the removal of the previously delineated impacted soil. The letter included the analytical results from post-excavation confirmatory sampling which showed that the significantly (greater than 8.8 ppm) contaminated soil had been removed. The excavation was subsequently backfilled with clean imported fill material.

Please call me if you have any questions.

Very truly yours,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

cc: J. Moran, Esq., ANC
J. Peters, ANC
E. Rawlings, ANC
J. Kessler, HSA
R. Creps, PES
J. Renauer, Kmart
D. Bruegel, Esq., Dickinson, Wright
R. Arulananthum, SFBRWQCB
S. Krival, DTSC

RUST ENVIRONMENT & INFRASTRUCTURE

January 6, 1995

RUST Environment & Infrastructure Inc.
12 Metro Park Road
Albany, NY 12205
Tel. (518) 458-1313 • FAX (518) 458-2472

Steve Krival, M.S.
Hazardous Substances Scientist
CAL-EPA, DTSC, Region 2
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2737

Dear Mr. Krival:

Subject: Draft Final Closure Plan
Former ANC Oakland Facility
EPA ID# CAD009162116

Enclosed please find two copies of the Draft Final Closure Plan for the subject site. The modifications requested in your June 20, 1994, Notice of Deficiency, and other correspondence and conversations, have been incorporated into this submittal. This document provides the hazard characterization of the site materials necessary for the public review. In addition, this closure plan incorporates the results of the confirmation sampling and analyses obtained to date and includes proposed additional sampling and analyses to complete the characterization process. We trust that this submittal will allow you to continue the CEQA process to completion.

We request that you review and approve the proposed sampling and analyses plans expeditiously so that we may proceed with the field activities as soon as possible. Time is of the essence in our attempts to comply with the scheduling requirements of the property owners. Your assistance is solicited and appreciated.

If you have any questions or comments concerning this closure plan, please call me.

Very truly yours,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

Enclosures

cc: J. Moran, Esq., ANC
J. Peters, ANC
E. Rawlings, ANC
J. Kessler, HSA
R. Creps, PES
J. Renauer, Kmart
D. Bruegel, Esq., Dickinson, Wright
R. Arulananthum, SFBRWQCB
[redacted]

Fax Transmittal Sheet

332-1336

State of California Environmental Protection Agency
Department of Toxic Substances Control, Region 2
Facility Permitting Branch
700 Heinz Avenue, Berkeley, California 94710

Date: 12/29/94 Number of Pages Including Cover 6

Deliver To:
Name: Barry Chan
Phone:

From:
Name: Steve Kinsel
Phone: 540-3857

Comments: Joe Marco's letter - per your request (see #1). P.S. The visqueen cover for your stock pile is looking mighty ragged! Is that what you want to happen? Happy Holidays. Steve-

Region 2 Office Fax #(510) 540-3937. If you have any problem with

American
National Can
Law Department

PECHINEY GROUP

FAX TRANSMISSION COVER SHEET

NOTICE: ***The documents accompanying this telecopy transmission contain information from the American National Can Law Department which may be Confidential and/or Legally Privileged. The information is intended only for the use of the individual or entity named on this transmission sheet. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this telecopied information may be subject to legal sanctions. In this regard, if you have received this telecopy in error, please notify us by telephone immediately so that we can arrange for either the return of the original documents at no cost to you or the destruction of the information and all copies.***

TO: **Stephen Krival** **DATE:** **12/7/94**

FROM: **Joseph S. Moran**
Tel: (312) 399-3658
Fax: (312) 399-3527

PAGES: 5
(Including Cover Sheet)

MESSAGE: **See attached**

AMERICAN NATIONAL CAN COMPANY
8770 W. Bryn Mawr Avenue, Chicago, Illinois, U.S.A. 60631-3542

NOTE: **If you have experienced difficulty in receiving this fax, please call ~~Joanne at (312) 399-3518~~ Joan at 312-399-3595 for assistance.**

WP917

American National Can

PECHINEY GROUP

December 7, 1994

Via Facsimile

Stephen Krival
Hazardous Substances Scientist
Facilities Permitting Branch
California Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2737

RE: **Request for Information and Inclusion of Additional Solid Waste Management Unit, Former American National Can Facility, Oakland, CA - EPA I.D. No. CAD 009 162 1116**

Dear Mr. Krival:

I am writing in response to your letter dated November 28, 1994, which we received yesterday, in which you request additional information on the former American National Can Company (ANC), Oakland, California facility, which is the subject of a pending closure. In response to your initial paragraphs relating to the sampling, excavation and backfilling of the area beneath the former "Building 12" chemical storage room, please be advised that, in fact, we did confer with the Alameda County Health Agency, Division of Hazardous Chemicals, Department of Environmental Health, and provided sampling data. Furthermore, prior to backfilling the excavated soils with clean fill, ANC requested and obtained approval from that agency.

With regard to the numbered requests, ANC responds as follows:

1. A statement that the company wishes to include the solvent contamination clean-up in the closure plan which this department is now considering.

Response: ANC is still evaluating whether it is appropriate to include the area as a solid waste management unit (SWMU) in the closure plan, given that the contaminated soils have already been removed with the oversight of Alameda County, who concurred with our assessment that sampling results show no further action is required. We would like to discuss with you at your earliest convenience your agency's rationale for such inclusion, and what it would mean in terms of additional time and money. We understand that such a meeting is tentatively scheduled, and await confirmation.

2. A supplemental closure plan for the solvent area clean-up. This supplemental plan should include, but not be limited to, the following information:

- The site sampling plan;
- all sampling methods and results, including chromatograms with identification of all peaks in the TPHg analyses performed.
- duplicates of all retrieved samples for analysis by EPA metyhods 8270, 8240, and 8010 at a laboratory of the Department's choosing;
- the vertical and lateral extent of all hazardous substances related to the Solid Waste Management Unit;
- a plot plan of the Building 12 Solvent Storage Room drawn to scale, and overlay of a scale map of the area of soil contamination; the name and location of each product stored in the room; the location of the roll-down door where we identified the order of solvents during walk through, and any drains, piping, tanks or other containment devices in or near the storage room.

Response: Subject to a determination as to whether or not it is appropriate to include the area, as mentioned above, ANC is pleased to provide, or in some instances, re-provide, the requested information, to the extent possible. Enclosed please find:

a. The site sampling plan. See "Building 12 Investigation - Soil Boring Location Map" attached to October 25 letter from Ed Alusow to me, which is marked Exhibit 1. The letter was previously provided to you on November 17.

b. An identification of the sampling methods and results, including chromatograms, and the other requested information is included in Exhibit 1. All but the chromatograms were previously provided with the october 25 letter.

c. Duplicates of samples would have had to have been obtained at the time of sampling. None were, thus none are available. QA/QC data is included with Exhibit 1.

d. The verticle and lateral extent of all hazardous substances identified in the area is shown in the plan entitled "Extent of Potential Soil Contamination"

attached to Exhibit 1. The plan was provided with the October 25 letter.

e. Enclosed is a plot plan showing the Building 12 solvent storage room with overlays of the area of potential soil contamination, and extent of excavation and location of post-excavation sampling. As previously reported, since the plant closed nearly five years ago, the name and location of each product stored in the room is not available. However, we have located Material Safety Data Sheets (MSDSs) for products which were typically used at three-piece can plants during the relevant time period. Exhibit 2 shows an opening to the storage room, which we believe is the roll-down door that you reference in your letter. To our knowledge, all tanks in the storage room were portables; all piping to the storage room was overhead; there were no known drains or containment devices in the storage room.

Also, you requested some additional information on schedules and other relevant information related to the development of the property by the new owners. After consulting with the new owners, ANC is able to offer the following:

- The schedule for starting re-construction of new facilities on the property.

  Response: K-Mart, the owner of the majority of the property, expects to have all permits in place and begin construction in the first week of January 1995.

- Other information which the owner/operator and its consultants have on contamination of other sites on the property (including submittal of the documents listed in your letter of November 17, 1994, attached hereto).

  Response: ANC is attempting to compare the vast amount of documents already provided to DTSC in previous submittals with the list of documents described in the November 17, letter. Once we have completed that comparison, we will provide whatever documents that have not previously been provided.

- The names and addresses of parties who now own the property and if there is not a common ownership, a plan of the property drawn to scale which shows the respective ownerships.

  Response: Please see attached plan. The addresses are as follows:

High Street Associates
c/o The Martin Group
100 Bush Street, 26th Floor
San Francisco, California 94104

K-Mart Corporation
Real Estate Department
3100 W. Big Beaver Road
Troy, Michigan 48084.

- A copy of any agreement which American National Can Company, Inc. has with the present owners by which American Can Company, Inc. retains responsibility for contaminate remediation.

Response: ANC has entered into a confidential agreement with High Street Associates and the K-Mart Corporation regarding residual contamination and implementing the approved remedial plans for areas which have already been the subject of the CEQA process. ANC declines to provide a copy, but is able to represent that it is committed to the clean-up of the site, as agreed to after negotiations with the various regulatory agencies involved over a three and a half year period. It is also committed to address any other issues which may arise in an expeditious manner. For example, when the area below the former Building 12 was identified as an area of potential concern, ANC took immediate and appropriate steps to evaluate and remediate to the satisfaction of Alameda County. No other new areas of potential concern are known to exist.

ANC trusts this information is helpful to fulfilling your objectives. With regard to information which has not yet been identified and provided, ANC will continue to investigate and provide any subsequently identified information, as appropriate.

Very truly yours,

Joseph S. Moran
Assistant General Counsel - Environmental

JSM/ch
cc: Jim Kessler - The Martin Group
David Bruegel, Esq. - Dickinson, Wright
Ed Alusow - Rust Environment

Alameda County Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Rm. 200, Oakland, CA 94621
Ph: 510-271-4320 FAX: 510-569-4757

Meeting Attendees

Subject ANC - 3800 E 8th St

Date 12/21/94

Location _____

	Name	Affiliation	Phone # / FAX #
1	BARNEY CHAN	ACEH - LOP	567-6765 / 337-9335
2	Ravi Arulanantham	RWQCB	286-1331 /
3	Kevin Graves	RWQCB	286-0435 / 286-1380
4	Dan Murphy	DTSC	540-3969 /
5	Steve Krivak	DTSC	540-3959 /
6	Scott Seery	ACDEH - LOP	567-6783 / 337-9335
7	Sum Arigala	RWQCB	510 286 0434 / 286 1380
8			/
9			/
10			/
11			/
12			/
13			/
14			/
15			/
16			/
17			/

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 Am Nat'l Can Today's Date 12/2/94

Site Address 3801 E. 8th Street

City Oakland Zip 94601 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)

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'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(f)
___	18. Exemption Request? (Y/N)	25536(b)
___	19. Trade Secret Requested?	25538

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 gndwater
One time soils
3) Daily Vadose
One time soils
Annual tank test
4) Monthly Gndwater
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 tstng
8) Annual Tank Testing
Daily Inventory
9) Other ____

___	7. Precis 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 6/88

Comments:

On-site to observe removal of ~15,000 gallon "heating oil" UST, previously decommissioned in place in 1986 by filling with (reported) ~~cement~~ Cement grout. (Upon arrival the UST had already been opened along its top axis for most of its length to facilitate removal of its contents.) Richard Burzinski (Wahler/RUST), R. Kieth Dorsa (HSR, Inc.), Jenny Han (PES Env.), and Larry James (COFD) were present during removal. The tank, now structurally compromised, was dragged from the excavation using two tracked excavators, where it was "cleaned" of excess material adhering to its exterior surfaces. The UST was still substantially tar coated. Although this inspector did not observe this directly, Mr. Dorsa reports that several holes were identified along the upper, south flank of the UST.

Water was observed in the pit (possible infiltration) on which black (apparent) product was floating.

Contact: Richard Burzinski

Title: Wahler/RUST

Signature: Richard Burzinski

Inspector: S. Seery II, III

Signature: S. Seery

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 Am Nat'l Con Today's Date 12/2/94

Site Address 3801 E. 8th St.

City Oakland Zip 94601 Phone ____

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

Inspection Categories:
- ___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
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3) Daily Vadose
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Annual tank test
4) Monthly Gndwater
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 tstng
8) Annual Tank Testing
Daily Inventory
9) Other ____

___	7. Precis 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 6/88

Comments:

Exposed material was discolored (green) and odorous. One sample was collected from underlying sediments from below each end of the UST invert, one (1) from the north end, one (1) from the south. An attempt was made to bring non-discolored material to the surface for sampling. Hence, samples were comprised of a tan sandy silt.

As no product conveyance piping was reportedly encountered, it was theorized that such piping may have been located at grade, or even overhead, from the UST to the facility.

The pit was to be temporarily backfilled, pending overexcavation, to prevent caving along 8th Street side.

Contact: Richard Burzinski

Title: Wahler/RUST

Signature: Richard Burzinski

Inspector: S. Seery II, III

Signature: S. Seery

STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY PETE WILSON, *Governor*

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

(510) 540-3734

November 28, 1994

Ms. Judy Peters
Engineer, Environmental Control
American National Can Company
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631-3542

Dear Ms. Peters:

REQUEST FOR INFORMATION RELATING TO THE SOLVENT CONTAMINATED AREA AT AMERICAN NATIONAL CAN - OAKLAND FACILITY, OAKLAND, CA, EPA I.D. NO. CAD 009 162 116.

This Department has become aware of an area at subject facility which is contaminated with solvent(s). We have also observed, on November 17, 1994, efforts to remediate this contamination. We are unaware of any responsible regulatory agency overseeing this activity. We are concerned that any clean-up be done in a manner which protects public health and the environment. And we would expect that your company would benefit from having a regulatory agency oversee the clean-up.

This Department has the authority to require information under section 25185.6 and to regulate remediation of contaminated soils, groundwater, and air under two sections of the California Health and Safety Code, Sections 25187 and 25355.5. We intend to proceed pursuant to Section 25187 if a more expeditious oversight arrangement cannot be agreed upon. Such an arrangement would be the incorporation of the solvent Solid Waste Management Unit in the closure plan for the RCRA storage areas now under consideration by this Department. If American National Can Company Inc. wishes to avail itself of this opportunity you should submit the following to this office at the earliest possible date(s).

1. A statement that the company wishes to include the solvent contamination clean-up in the closure plan which this Department is now considering,

2. A supplemental closure plan for the solvent area clean-up. This supplemental plan should include, but not be limited to, the following information:

   o the site sampling plan;

- all sampling methods and results, including chromatograms with identification of all peaks in the TPHg analyses performed.
- duplicates of all retrieved samples for analysis by EPA metyhods 8270, 8240, and 8010 at a laboratory of the Department's choosing;
- the vertical and lateral extent of all hazardous substances related to the Solid Waste Management Unit;
- a plot plan of the Building 12 Solvent Storage Room drawn to scale, and overlay of a scale map of the area of soil contamination; the name and location of each product stored in the room; the location of the roll-down door where we identified the order of solvents during walk through, and any drains, piping, tanks or other containment devices in or near the storage room.

In order that we may better coordinate with the owner/operator in its efforts to have the property redeveloped we also request the following information:

- The schedule for starting construction of new facilities on the property.
- Other information which the owner/operator and its consultants have on contamination of other sites on the property (including submittal of the documents listed in your letter of November 17, 1994 attached hereto).
- The names and addresses of the parties who now own the property and, if there is not a common ownership, a plan of the property drawn to scale which shows the respective ownerships.
- A copy of any agreement which American National Can Company. Inc has with present owners by which American Can Co., Inc. retains responsibility for contaminant remediation.

Please call me at (510) 540-3959 to advise when all the above information would be submitted.

Sincerely

Stephen Krival
Hazardous Substances Scientist
Facilities Permitting Branch

Certified Mail No. P 659 131 189

cc: Joseph Moran, Legal Counsel
American National Can Company
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631-3542

Edward W. Alusow
Senior Project Manager
RUST Environmental & Infrastructure
12 Metro Park Road
Albany, New York 12205

Richard Burzinski
RUST E & I
P.O. Box 10023
Palo Alto, California 94303

James M. Kessler
Senior Vice President
The Martin Group
100 Bush Street, 26th Floor
San Francisco, California 94104

Brian Matsummura
Office of Planning & Building
1330 Broadway
Oakland, California 94612

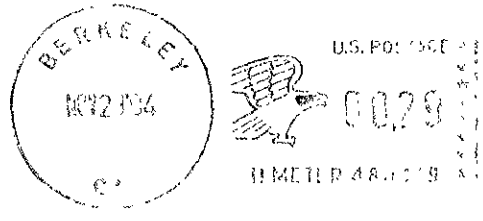
Karen Howard
Office of Planning & Building
1330 Broadway
Oakland, California 94612

Sum Aragala
San Francisco Regional Water
Quality Control Board
2101 Webster Street
Suite 500
Oakland, California 94612

Jack Penauer
K-Mart
5400 Auburn Blvd.
Sacramento, California 95841

cc: Barney Chan
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, California 94502

STATE OF CALIFORNIA
CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737



Barney Chan
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, California 94502

BARNEY CHAN
11/23/94 Called
- Pls provide AT & T forms

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION

1131 HARBOR BAY PARKWAY, STE 250
ALAMEDA, CA 94502-6577
TELE: (510) 567-6700
FAX: (510) 337-9335

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:

_____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.

[illegible] A PENALTY FOR NOT

UNDERGROUND TANK CLOSURE PLAN

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

X 1. **Business Name** AMERICAN NATIONAL CAN COMPANY

Business Owner Same as above

2. **Site Address** 3801 E. 8th Street

City Oakland **Zip** 94601 **Phone** N/A

X 3. **Mailing Address** Mail Code 11 H, 8770 W. Bryn Mawr

City Chicago, Illinois **Zip** 60631 **Phone** (518) 458-1313

X 4. **Land Owner** American National Can Company

Address 8770 W. Bryn Mawr **City, State** Chicago, Ill. **Zip** 60631

X 5. **Generator name under which tank will be manifested**

American National Can Co.

X **EPA I.D. No. under which tank will be manifested** CAD 009162116

6. Contractor HSR, Inc.

Address 3851 Charter Park Drive, Suite A

City San Jose, CA 95136 Phone (408) 265-4300

License Type* A + HAZ ID# 574623

*Effective January 1, 1992, Business and Professional Code Section 7058.7 requires prime contractors to also hold Hazardous Waste Certification issued by the State Contractors License Board. Indicate that the certificate has been received, in addition, to holding the appropriate contractors license type.

7. Consultant Rust Environment & Infrastructure

Address 12 Metro Park Road

City Albany, New York 12205 Phone (518) 458-1313 EXT 387

8. Contact Person for Investigation

Name Walter Howard/Ed Alusow Title Project Manager

Phone Richard Burzinski = Local Contact @ (415) 968-6250

9. Number of tanks being closed under this plan 1

Length of piping being removed under this plan 10'

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 ~~Erickson, Inc.~~ Evergreen Environmental. EPA I.D. No. ~~CAD 009 466 392~~

Hauler License No. 0019 License Exp. Date N/A

Address 255 Parr Blvd

City ~~Richmond~~ State CA Zip 94801

b) Product/Residual Sludge/Rinsate Disposal Site

Name GIBSON/PILOT EPA I.D. No. CAD 043 260 702

Address 475 Seaport Blvd.

City Redwood City State CA Zip 94063

c) Tank and Piping Transporter

Name Erickson, Inc. EPA I.D. No. CAD 009 466 392

Hauler License No. 0019 License Exp. Date N/A

Address 255 Parr Blvd.

City Richmond State CA Zip 94801

d) Tank and Piping Disposal Site

Name Erickson, Inc. EPA I.D. No. CAD 009 466 392

Address 255 Parr Blvd.

City Richmond State CA Zip 94801

X 11. Experienced Sample Collector

Name Richard Burzinski; R.E.A., R.G.

Company Rust Environmental & Infrastructure (formerly Wahler Assoc.)

Address 1023 Corporation Way

City Palo Alto State CA Zip 94303 Phone (415) 968-6250

X 12. Laboratory

Name Anametrix

Address 1961 Concourse Drive

City San Jose State CA Zip 95131

State Certification No. 1234

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

If yes, describe. Heating oil tank was abandoned in place by filling with cement bentonite grout in 1986. Prior to closure, some product was released from the UST. This is all the known information

14. Describe methods to be used for rendering tank inert

Dry ice as required

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)		
15,000 gal	Heating oil. Tank closed in place in 1986	Soil	Sidewalls every 20' & bottom samples at approx. 14' below ground surface. Extensive environmental investigation has delineated an area of over-excavation that will encompass over 400 yards of material.

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) 400 yards	Sampling Plan 4 samples every 50 yards, to be composited in analytical lab & tested for TPH and/ BTEX

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
Heating oil		LUFT - TPH - D & BTEX	LUFT

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

18. Submit Worker's Compensation Certificate copy

Name of Insurer State Compensation Insurance Fund

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.

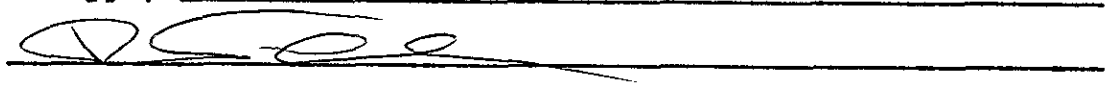
I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

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) HSR, INC.

Signature 

Date 11/22/94

X Signature of Site Owner or Operator

Name (please type) American National Can c/o Rust Environmental & Infrastructure

Signature Richard Bryan as limited agent for American National Can

Date 11/22/94

STATE COMPENSATION INSURANCE FUND

P.O. BOX 420807, SAN FRANCISCO, CA 94142-0807

CERTIFICATE OF WORKERS' COMPENSATION INSURANCE

SEPTEMBER 30, 1994

POLICY NUMBER: 1357591 - 94
CERTIFICATE EXPIRES: 8-1-95

AMERICAN NATIONAL CAN COMPANY
ATTN KRISTI STRATTON
8770 WEST BRYN MAWR AVE
CHICAGO IL 60631

JOB: 941301 EAST 8TH AND HIGH ST OAKLAND, CA

This is to certify that we have issued a valid Workers' Compensation insurance policy in a form approved by the California Insurance Commissioner to the employer named below for the policy period indicated.

This policy is not subject to cancellation by the Fund except upon ten days' advance written notice to the employer.

We will also give you TEN days' advance notice should this policy be cancelled prior to its normal expiration.

This certificate of insurance is not an insurance policy and does not amend, extend or alter the coverage afforded by the policies listed herein. Notwithstanding any requirement, term, or condition of any contract or other document with respect to which this certificate of insurance may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

John A. Wolff

PRESIDENT

EMPLOYER

J/D HAZARDOUS SUBSTANCE REMOVAL
HSR INC
3851 CHARTER PARK DR #A
SAN JOSE CA 95136

SCIF 10262 (REV. 10-86)

COPY FOR INSURED'S FILE

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION
Declaration of Site Account Refund Recipient
SITE OWNER FILLS OUT PER SITE
-- OPTIONAL --

The property owner will use this form to designate someone other than him- or her- self to receive any refund due at the completion of all deposit/refund projects at the site listed below. In the absence of this form, the property owner will receive any refund. Only one person at any one time may be designated to receive any refund.

SITE NUMBER/ADDRESS:

X _____
Site Number

American National Can Co.
Company Name

3801 E. 8th Street
Street Address

Oakland 94601
City Zip Code

PROPERTY OWNER

American National Can Co.
Owner's Name

8770 West Bryn Mawr
Owner's Address

Chicago Ill. 60631
Owner's City State Zip

I designate the following person to receive any refund due at the completion of all deposit/refund projects:

HSR INC.
Name

3851 Charter Park Drive, Suite A
Street Address

San Jose, CA 95136
City / Zip

Richard Burzinski as limited agent for American National Can
Property Owner Signature

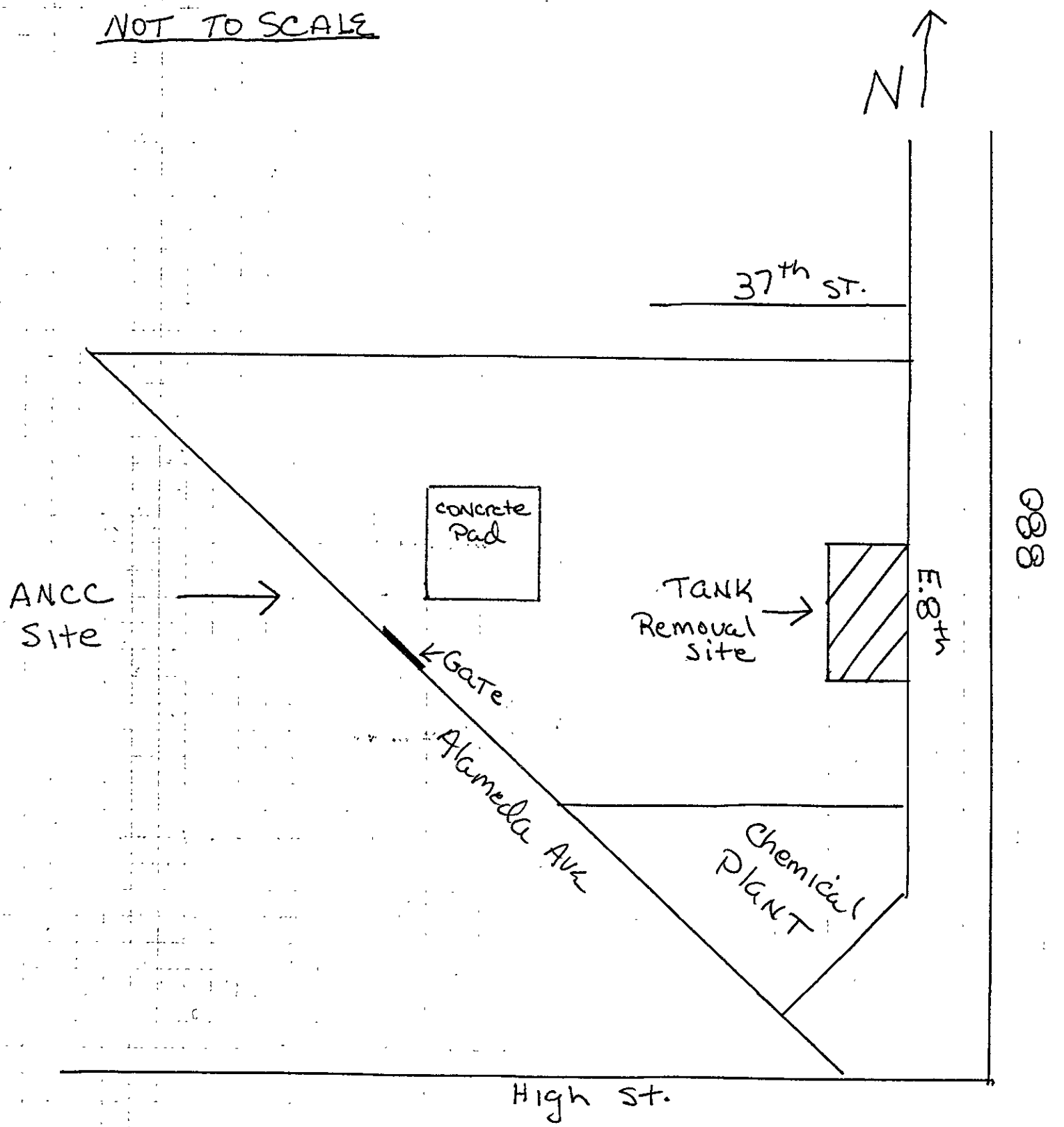
11-22-94
Date

Richard Burzinski as limited agent for American National Can
Property Owner Name

RETURN FORM TO: Alameda County, Hazardous Materials Div.
80 Swan Way, Rm 200
Oakland, CA 94621-1439

American National Can Project
801 E. 8th St.
Oakland, Ca.

NOT TO SCALE



Thurs 1st 10°°

HSR Inc.

3851 Charter Park Drive, Suite A • San Jose, California 95136 • Phone 408-265-4300 Fax 408-265-1664

November 22, 1994

Mr. Barney Chan
Alameda County Health Care Service Agency
Department of Environmental Health
Hazardous Materials Division
1131 Harbor Bay Parkway, Ste. 250
Alameda, CA 94502-6577

Dear Mr. Chan:

Per our phone conversation of today, attached please find 3 complete sets of materials relevant to the removal of the UST at our project site in Oakland for American National Can.

If all is satisfactory, I would like to pick up a stamped copy of this from you on Monday to bring to the Oakland Fire Dept.

Please feel free to contact me or Keith Dorsa at our office should you have any questions.

My best of a Happy Thanksgiving.

Sincerely,

Patrick J. Hogan
HSR, Inc.

RUST ENVIRONMENT & INFRASTRUCTURE

RUST Environment & Infrastructure Inc.
12 Metro Park Road
Albany, NY 12205
Tel. (518) 458-1313 • FAX (518) 458-2472

November 17, 1994

Barney Chan
Hazardous Materials Specialist
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, CA 94502

Dear Mr. Chan:

Subject: Building #12 Sample Results
Former American National Can Company Facility
Oakland, California

At the request of Joseph S. Moran, Esq., of American National Can Company, I am sending you the enclosed letter report for your files. Remedial activities have been undertaken to address the soils in the vicinity of the locations from which these samples were collected, and a report on those remedial activities is being prepared. You will be copied on that report when it is completed.

In the meantime, if you have any questions, please contact me.

Very truly yours,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

cc: J. Moran, Esq.

Enclosure

~2000 gallons Tank had oily water + sludge + concrete

Area 2 - Encl. HSR Keith Dorsey - 408-265-4300 next week -

ND Area 4 - 6 ppb TPH 35 ppb Lyfer 20 ppb

RUST ENVIRONMENT & INFRASTRUCTURE

RUST Environment & Infrastructure Inc.
12 Metro Park Road
Albany, NY 12205
Tel. (518) 458-1313 • FAX (518) 458-2472

July 14, 1994

Mr. Barney Chan
Hazardous Materials Specialist
Department of Environmental Health
1131 Harbor Bay Parkway - Rm. 250
Alameda CA 94502

Subject: Status of Work at the former
American National Can Company
Oakland California Facility

Dear Mr. Chan:

In response to your request during our telephone conversation of yesterday, this letter will provide you with a status for the work underway at the subject facility, and a tentative schedule for the implementation of the Areas 2 and 4 Remedial Workplan and the Area 3 Remedial Workplan.

During the past six or so months, intense activity has been occurring at the plant property in conjunction with the demolition of the buildings. During that time as you know, ANC has continued with its quarterly ground water monitoring. Also during that time, several monitoring wells that were jeopardized by demolition activities were closed and removed under permit from the Alameda County Flood Control District. Ground water level measurements, product thickness measurements, and ground water samples have been collected and reported on in accordance with the program that has been in place.

It has been relayed to me by the demolition contractor, Plant Reclamation, that they will have completed most of their work by the end of July. Since the contractor's laydown area is in Area 4, their departure from the area is required prior to initiation of the remedial activities. Therefore, RUST and ANC anticipate that implementation of the Areas 2 and 4 Remedial Workplan will commence early in August. A contractor has been selected by ANC to perform the work and is prepared to mobilize to the site to begin work within one week of receiving authorization to proceed.

Similarly, the implementation of the Remedial Workplan for Area 3 awaits the completion of demolition activities at the property. Once the demolition contractor demobilizes from the site, an inventory will be taken of remaining, operable ground water monitoring wells, necessary

repairs will be made to damaged monitoring wells, additional monitoring wells required to perform the Workplan activities will be constructed, and Workplan activities will begin.

Meanwhile, quarterly monitoring activities continue, with water level measurements, product thickness measurements, and water samples collected this week. Floating product will be removed from those monitoring wells exhibiting recoverable thicknesses of product, as has been occurring in the past.

If you have any questions, please call me.

Very truly yours,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

cc: L. Feldman
S. Arigala
J. Moran, Esq.
J. Kessler
R. Creps
J. Renauer

STATE OF CALIFORNIA PETE WILSON, Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, SUITE 500
OAKLAND, CA 94612
(510) 286-1255

December 30, 1993
File: SLIC Cost-Recovery(LF)

Joseph S. Moran
Assistant General Counsel-Environmental
American National Can Company
Mail Suite 14C
8770 Bryn Mawr Avenue
Chicago, Illinois 60631-3542

Subject: Remediation Plan and Health Risk Assessment Approval
Former ANC Co. Facility, Oakland

Dear Mr. Moran:

Staff of the Regional Board have reviewed the Draft Baseline Health Risk Assessment Report dated December 7, 1993 and the Remedial Work Plan for Areas 2 and 4 dated December 1993, for the subject facility. Staff have discussed the Remedial Work Plan for Areas 2 and 4, as well as overall site remediation issues with Ed Alusow of RUST and these discussions have resulted in several changes in the Work Plan in order to be consistent with the requirements of this Regional Board. My staff have also discussed the investigation, remediation plan, and risk assessment matters with staff of the Alameda County Department of Environmental Health (ACDEH).

I understand that you and your consultant have discussed utilizing Alternative Points of Compliance for managing any residual soil and groundwater pollution which may exist after the proposed soil and limited groundwater cleanup. This is based upon the nature of the site's hydrogeology, the low probability for domestic water use at the site, the impacts from the adjoining Ekotek Lube site on Area 3, and the lack of a cost-effective method to completely eliminate the groundwater pollution problem through active technologies. This approval letter contains conditions which must be met if the site is to qualify for the Alternative Points of Compliance Program.

This Regional Board staff has no objection to your proceeding with the proposed Remedial Work Plan for the subject site provided the following:

1. All sampling and remediation activities shall be coordinated with staff of the ACDEH. All appropriate tank system closure permits and monitoring well closure permits shall be obtained from ACDEH and ACWD, Zone 7, respectively.
2. All post-cleanup soil verification monitoring results shall be submitted to this office and to ACDEH for review.
3. A technical report is required after soil cleanup which reviews whether the residual site soil pollution, if any, poses health or environmental risks. The Draft Baseline Health Risk Assessment did not include Areas 2 and 4. A focussed risk assessment may be required as well as a fate and transport review for residual polluted soils which may exist following your proposed tank closure and soil excavation program. A recommendation for any additional soil cleanup

to protect against further water quality degradation or to protect public health should be a part of this report.

4. A water quality verification monitoring program is required as part of any remedial program which leaves residual soil and groundwater pollution at a site. Since the Subsurface Investigation Report, August 1991, and subsequent reports fail to adequately delineate the full extent of groundwater pollution additional off-site wells are required. Therefore this water quality verification monitoring program should contain both on-site and off-site monitoring wells, especially in Area 2 and 4, designed to determine the "non-detect" extent of any residual groundwater pollution. This program should be implemented following your proposed tank closure and soil excavation program.
5. Under the Alternative Points of Compliance Program this office also requires a plan for managing the remaining risks posed by any residual soil and groundwater pollution. This plan could include institutional controls such as deed restrictions; site construction, operation, maintenance, health and safety plans; implementation and maintenance of any groundwater containment systems if appropriate; and commitment to verification monitoring.

Staff have reviewed the completed remedial actions for Areas 1 and 5 and the results of post remedial action groundwater monitoring. The ACDEH has recommended closure of these two Areas. Based upon my staff's review, and ACDEH's recommendation no further action is required at Area 1 and Area 5.

As indicated previously, the Draft Baseline Health Risk Assessment dated December 7, 1993 focussed on Area 3, which has been impacted from pollutants originating on the adjoining former Ekotek Lube site. The Health Risk Assessment concluded that potential health risks exist if the groundwater was used for consumptive use, and recommended a deed restriction be recorded with the property to prevent the possibility of future groundwater development in Area 3 for drinking water until such time as the groundwater can be demonstrated to meet California drinking water standards or it can be demonstrated that groundwater consumption would have no adverse health affects. We concur with this recommendation.

Please contact Lester Feldman of my staff at (510) 286-1332 if there are any questions.

Sincerely,

Steven R. Ritchie,
Executive Officer

cc: Brian Matasmura, City of Oakland
Barney Chan, Alameda County DEH
Ravi Arulanantham, Alameda County DEH
Gilbert Jensen, Alameda County District Attorney's Office
Ed Alusow, RUST
James Kessler, Martin Group

STATE OF CALIFORNIA PETE WILSON, Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, SUITE 500
OAKLAND, CA 94612
(510) 286-1255

ALCO HAZMAT

94 JAN -3 PM 2:14

December 30, 1993
File: SLIC Cost-Recovery(LF)

Joseph S. Moran
Assistant General Counsel-Environmental
American National Can Company
Mail Suite 14C
8770 Bryn Mawr Avenue
Chicago, Illinois 60631-3542

Subject: Remediation Plan and Health Risk Assessment Approval-
Former ANC Co. Facility, Oakland

Dear Mr. Moran:

Staff of the Regional Board have reviewed the Draft Baseline Health Risk Assessment Report dated December 7, 1993 and the Remedial Work Plan for Areas 2 and 4 dated December 1993, for the subject facility. Staff have discussed the Remedial Work Plan for Areas 2 and 4, as well as overall site remediation issues with Ed Alusow of RUST and these discussions have resulted in several changes in the Work Plan in order to be consistent with the requirements of this Regional Board. My staff have also discussed the investigation, remediation plan, and risk assessment matters with staff of the Alameda County Department of Environmental Health (ACDEH).

I understand that you and your consultant have discussed utilizing Alternative Points of Compliance for managing any residual soil and groundwater pollution which may exist after the proposed soil and limited groundwater cleanup. This is based upon the nature of the site's hydrogeology, the low probability for domestic water use at the site, the impacts from the adjoining Ekotek Lube site on Area 3, and the lack of a cost-effective method to completely eliminate the groundwater pollution problem through active technologies. This approval letter contains conditions which must be met if the site is to qualify for the Alternative Points of Compliance Program.

This Regional Board staff has no objection to your proceeding with the proposed Remedial Work Plan for the subject site provided the following:

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5. Under the Alternative Points of Compliance Program this office also requires a plan for managing the remaining risks posed by any residual soil and groundwater pollution. This plan could include institutional controls such as deed restrictions; site construction, operation, maintenance, health and safety plans; implementation and maintenance of any groundwater containment systems if appropriate; and commitment to verification monitoring.

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Please contact Lester Feldman of my staff at (510) 286-1332 if there are any questions.

Sincerely,

Steven R. Ritchie,
Executive Officer

cc: Brian Matasmura, City of Oakland
Barney Chan, Alameda County DEH
Ravi Arulanantham, Alameda County DEH
Gilbert Jensen, Alameda County District Attorney's Office
Ed Alusow, RUST
James Kessler, Martin Group

RUST ENVIRONMENT & INFRASTRUCTURE
Formerly DUNN CORPORATION

518-458-1313x373
FAX:518-458-2472

TELECOPY COVER SHEET

PLEASE DELIVER TO: Barney Chan

FAX NUMBER: 510-569-4757

FROM: **EDWARD W. ALUSOW, SENIOR PROJECT MANAGER**

NUMBER OF PAGES INCLUDING COVER PAGE: 2

COMMENTS: Please insert the attached Page 14 in place of the Page 14 bound in the "Remedial Work Plan For Areas 2 and 4, American National Can Company, Oakland, California Facility" dated December 1993.

cc: Joe Moran Lester Feldman Rob Creps
Jim Kessler Barney Chan

or TPHg (Area 4) will require additional remediation in the area of the sample. The area represented by a sample is considered to be the area halfway to the nearest sample location in each direction.

4.4 SAMPLING OF STOCKPILED SOILS

Soils excavated from Areas 2 and 4 which, based on PID screening results appear to not be contaminated will be stockpiled separately from contaminated soils and sampled to determine if they can be reused as site backfill. In addition, all Area 2 soils will be stockpiled separate from Area 4 soils. Composite soil samples will be collected from the stockpiles of clean soil at a frequency of 1 per every 100 yards to determine if it can be utilized as backfill. These samples will be analyzed at an off-site laboratory. Samples collected from the area will be analyzed for BTEX and TPHd (Area 2) and BTEX and TPHg (Area 4) by DHS LUFT Methods. Soil exhibiting less than 10 ppm of TPHd (Area 2) or TPHg (Area 4) and no detectable concentrations of BTEX will be used as on-site backfill. Soil not meeting these criteria will be placed with the contaminated soil and subsequently disposed of at an approved off site disposal facility. Contaminated soil may be treated on site as described in Section 4.5 prior to off-site disposal.

Composite samples will be collected of contaminated soil which is stockpiled to determine characteristics for disposal. The frequency of composite samples collected will be determined by requirements of the disposal facility. Each composite will consist of 5 soil samples collected from beneath the surface of the stockpile. Analytical parameters will be consistent with those required by the proposed disposal facility. Expedited turnaround will be requested by the analytical laboratory to facilitate completion of remedial activities (e.g., backfilling).

4.5 ON SITE SOIL TREATMENT

Soil removed during excavation of Areas 2 and 4 will be screened and separated based on conformance with landfill disposal criteria. Soil which is not suitable for disposal at a landfill will be treated on site to reduce contaminant concentrations to an acceptable level for landfill disposal.

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

December 17,1993

Mr. Lester Feldman
RWQCB
2101 Webster St., Suite 500
Oakland, CA 94612

Subject: Review of LOP Review of Remedial Work Plan for Areas 2 and 4 for American National Can, 3801 E. 8th St., Oakland CA 94601

Dear Lester:

I have reviewed the above work plan and have drafted this letter to be sent to Ms. Peters of ANC. I would appreciate your comments and your review of my letter. I understand that you have had a chance to review the same work plan. I will be on vacation next week, December 20-24 and will be returning on Monday, December 27. I would like to have an opportunity to discuss your comments and incorporate any changes prior to sending this letter out. If you are able to meet or talk on Monday, please leave a message on my voice mail. If there are only minor changes, you may send or fax a corrected version of this letter to me for my edification and distribution. In any event, I would appreciate your input.

In another matter regarding this site, I hope you or Rich Hiett have had an opportunity to review the reports and letters I've sent regarding closure for Areas 1 and 5. I know RUST and ANC would like to have these areas resolved ASAP. If you have any questions or comments, please leave a message on my voice mail.

Thanks for your co-operation.

Sincerely,

Barney Chan

Barney Chan, ACEH LOP

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

December , 1993

Ms. Judith Peters
American National Can Company
8770 W. Bryn Mawr Ave.
Chicago, Il 60631

Re: Comment on Review of December, 1993 Remedial Work Plan for Areas 2 and 4 for American National Can, 3801 E. 8th St., Oakland, CA 94601

Dear Ms. Peters:

Our office has received and reviewed the above referenced work plan for Areas 2 and 4 at the ANC site as prepared by RUST Environment and Infrastructure. This work plan calls for the removal of the 15,000 gallon diesel tank in Area 2 and the excavation of contaminated soils in both Areas 2 and 4. Generally, our office agrees with this approach but we have the following observations/concerns which must be addressed prior to initiating this work:

Area 2:

1. Our office prefers the use of an OVA instrument for field screening soils. For the anticipated contaminants, we feel an OVA instrument is more representative of actual contamination concentrations. You should also develop a "standard" screening method using repeatable sample weight, equilibration time, sample preparation and sample reading.

2. Please insure that all existing wells which are damaged or destroyed during the demolition and remediation stages are properly closed in accordance with the Alameda County Zone 7 requirements.

3. Prior to underground tank removal, please complete an underground storage tank removal plan for our office's review and approval. Please contact our office at least two working days prior to tank removal and/or post-excavation field sampling. Be aware that as part of your corrective action plan (CAP), after remedial activities, you should examine whether the current monitoring plan is adequate and modify it if appropriate.

Area 4:

1. Our office, at this time does not agree with this statement of your consultant, "the level of groundwater impact in each area does not warrant remediation.." We feel that the concentration of xylenes and ethylbenzene in GW-3 is still likely very high, exceeding their respective MCLs.

The work plan acknowledges that groundwater contamination may exist and states that where this condition exists, "This may require the removal of contaminated groundwater through a well point recovery system."

2. In regards to action levels for no further excavation, please be aware that if the following concentrations of soil contamination are left in place; 5ppm for individual BTEX compound, 20 ppm for cumulative ppm for BTEX compounds or 250 ppm for TPHd and TPHg, extended monitoring, on a site specific basis will be required for an extended period beyond one year.

Certainly, if the soil and groundwater contamination is remediated and quarterly monitoring is instituted, after four consecutive quarters on non-detectable contaminants, closure for these specific areas can be recommended.

In regards to the sampling frequency for soil reuse, the work plan proposes one composite sample per every 100 cubic yards. For the large quantity of expected stockpiled soils, up to 2000 cubic yards, you may use a statistical approach to verify an adequate number of samples. Be aware, when you composite samples, you must use the number of samples times the detected concentration in your verification calculations. The action limits for reuse of soils is as stated, 10ppm for TPHg and d and ND for BTEX. Note that the work plan erroneously stated, "soils exhibiting less than 10 ppm of TPHd (Area 2) **or BTEX** and TPHg (Area 4) and no detectable concentration of BTEX will be used as on-site backfill". The bolded words **or BTEX** should not appear in that statement.

3. As stated previously for Area 2, as part of your CAP a revised monitoring plan may be necessary for this area after the remediation occurs.

Upon the resolution of the aboves concerns, you may immediately proceed. Please contact me at (510) 271-4530 should you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: L. Feldman, RWQCB
R. Arulanantham, RWQCB
R. Hiett, RWQCB
R. Shahid, Director, ACDEH
E. Howell, Chief, Hazardous Materials Division, ACDEH
G. Jensen, Alameda County District Attorney Office
B. Matsumura, Planning and Building, City of Oakland
Anu Raud, Planning and Building, City of Oakland
M. Banico, City of Oakland Zoning Department
J. Moran, Asst. General Counsel, American National Can
E. Alusow, RUST Env. and Infrastructure

ANC4&2

12/27/93
Cen w/ Lester : Said he wanted :

(1) offsite gw contamination must be addressed (ok in CAP)

(2) A. P. C. — will likely be proposed ∴ all conditions must be met.

(3) Inside gw contamination must be protective of human + env. health w/ a site specific R.A.

(4) For this site - funnel all letters through Lester for a RWQCB letter encorporating Local Agencies input plus RWQCB.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way Rm. 200
Oakland, CA 94621
(510) 271-4320

December 10, 1993

Mr. Lester Feldman
Section Leader, Toxics Cleanup Division
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, CA 94612

SUBJECT: PROPOSED DEVELOPMENT OF K-MART SUPERSTORE
FORMER AMERICAN NATIONAL CAN COMPANY SITE
3801 EAST 8th STREET, OAKLAND, CALIFORNIA

Dear Lester:

I have completed the review of the Health Risk Assessment (HRA) report that was prepared as part of the requirement to evaluate the future suitability of the former American National Can Company (ANC) site for a proposed K-Mart store. The HRA was prepared by Soma Environmental Engineering, Inc., and includes a complete environmental fate and transport modeling and risk characterization of several contaminants of concern.

Although there is other UGT related soil and groundwater pollution at this site (Area 1, 2, 4, and 5), this HRA was limited to the subsurface contamination in Area 3. Area 3 is immediately adjacent to an abandoned former waste oil recycling facility (currently known as Ekotek Lube site) and is the area of most concern to this office (as far as the future commercial development was concerned) due to the presence of many carcinogenic volatile compounds in groundwater and the intrusion of this contaminant plume into the ANC property. The proposed main K-Mart store will be considerably far away from this contaminant plume that has spread into the ANC property and only a small warehouse (9000 sq.ft) is planned to be built in Area 3. Therefore, based on these proposed redevelopment plans, several future exposure scenarios were evaluated in this HRA.

The baseline risk (current health risks under proposed commercial development without any mitigation) evaluation indicates that the groundwater contamination in Area 3 will not pose any undue risk to future K-Mart customers, employees or the construction workers. **Based on this information, this office is satisfied that Area 3 no longer poses a future threat to the intended construction of the K-Mart superstore on this property.** If a warehouse is to be built as planned in Area 3, a vapor barrier (in addition to the standard concrete slab floor) is recommended by this office as an additional precaution to prevent any potential vapor intrusion into the building.

Prior to any demolition of the existing buildings and the construction of the new K-Mart store, a Health and Safety plan must be submitted to this office, that will address the health and safety issues of the construction workers.

Although the primary purpose of the HRA was to study health risks pertaining to the future land-use issues (not water quality issues), the report briefly describes the status of groundwater in Area 3. I concur with the recommendation of this report that a **deed restriction** be placed on the ANC property and the groundwater shall not be used as a source of drinking water.

The US-EPA(Region IX) has recently conducted a site assessment at the former Ekotek site and concluded that the remaining liquid in the above ground tanks, as well as in the sumps, remain a potential for continuing release of hazardous materials and therefore recommends that the remaining liquids in the tanks and sumps be emptied. This office concurs with US-EPA and considers the presence of refinery waste at the Ekotek site a potential safety, fire, and nuisance threat to the future users of the K-Mart.

This US-EPA report also identifies the presence of several chemicals that are also detected in Area 3, implying (in addition to the results of the fate and transport modeling) that the source of Area 3 contamination is indeed coming from the former Ekotek site. The capping of the sumps will additionally prevent excess water mounding on the Ekotek site, which now seems to be the prime cause for the spread of contaminants into ANC property against the groundwater flow direction. It is hoped therefore, once this mounding is removed, that the spread of this plume towards the ANC property will gradually recede.

The US-EPA has also provided this office with a work plan to properly remove, clean and dispose of the remaining liquids and cap the sumps on the Ekotek site. **The scope of this work plan should be followed accordingly and this office requires a formal closure report on the emptying and capping activities before a final occupancy permit can be issued to K-Mart by the City of Oakland.** This requirement however, does not prevent any demolition or construction activities to commence immediately at the subject site.

Please be advised that these recommendations are site specific based on the submitted information and could be revised if new information is received subsequent to this letter.

If you have any questions, please call me at 271-4320.

Sincerely,

Ravi Arulanantham, Ph.D., CHMM
Staff Toxicologist

c: Rafat Shahid, Director, ACDEH
Edgar Howell, Chief, Division of Hazardous Materials, ACDEH
Barney Chan, Local Oversight Program, ACDEH
Steven Ritchie, Executive Officer, RWQCB-SF Bay Region
Donald Dalke, Chief, Toxic Cleanup Division, RWQCB-SF Bay Region
Richard Hiett, Toxic Cleanup Division, RWQCB-SF Bay Region
Gilbert Jensen, District Attorney, Alameda County
Vivian O'Neal, City of Oakland Attorney's office
James Rinehart, Director, City of Oakland OEDE
Brian Matsumura, Planning and Building, City of Oakland
Anu Raud, Planning and Building, City of Oakland
Maria Banico, City of Oakland Zoning Department
Joseph Moran, Asst. General Counsel, American National Can
James Kessler, Senior Vice President, The Martin Group

PES Environmental, Inc.
Engineering & Environmental Services

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 1

To See below	From R. Creps
Co.	Co. PES
Dept.	Phone #
Fax #	Fax #

MEMORANDUM

Date: November 8, 1993

From: Robert S. Creps

To: (via facsimile) Lester Feldman - S.F. Bay Regional Water Quality Control
Barney Chan - Alameda County Dept. of Environmental Health
Ravi Arulanantham - Alameda Co. Dept. of Environmental Health
Jim Kessler - The Martin Group
Joe Moran - American National Can Co.
Ed Alusow - RUST Environment
Mansour Sepehr - SOMA
Dave Bruegel - Dickenson, Wright, et al (Kmart)
Sharon Newlon - Dickenson, Wright, et al

PLEASE DELIVER TO

Subject: **Project Status Meeting, American National Can Company, Oakland, California**

PES has been asked to coordinate the location and time of a project status meeting this week.

The meeting has been scheduled for 1:30 pm on Wednesday, November 10, 1993. We will meet at the RWQCB offices on the 5th floor, at 2101 Webster Street, Oakland.

24035DM.012

11/8/93

John Alt 2301 E12th St. - review wp.
Tom Jones - Re Manuel Rodriguez

11/16/93: ANC Meeting
John Faustin SSMA
Mansur
Jon Martin
Martin Salberg KMart
Joe Moran -

Used museums Constant → porosity
Slug tests → hydraulic Cond., 1E+0, 1E+2 range
TOC → used in model for air dispersion.
Thickness for saturated zone 7-10'
Use water balance to determine if cone on ANC site can be accounted for by model

STATE OF CALIFORNIA PETE WILSON, *Governor*

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, SUITE 500
OAKLAND, CA 94612
(510) 286-1255

November 8, 1993
File: UST 01-0551(LF)

L.C. Webster
P.O. Box 92918
Long Beach, CA 90805

Subject: Ekotek Lube Site - Status of Compliance with Water Code

Dear Sir:

The Regional Board staff have reviewed your letter of November 2, 1993 submitted in response to my technical report request letter dated October 13, 1993. Your letter does not contain the requested work plan and time schedule delineating steps to be taken to define the horizontal and vertical extent of soil and groundwater pollution at the former Ekotek Lube Site in Oakland. Therefore you have not complied with the request made pursuant to the California Water Code Section 13267(b).

Your letter also questioned the basis for the technical report request. You are free to visit our offices and review our files concerning this matter. The Site is currently listed as an underground storage tank release site in the State of California LUSTIS (database system). The Site is also currently listed on this office's North Bay Toxics Sites List.

Please contact Lester Feldman of my staff at (510) 286-1332 to arrange to discuss this matter or to review our files.

Sincerely,

Steven R. Ritchie,
Executive Officer

cc: Lexa International
Gilbert Jensen, Alameda County District Attorney's Office
Barney Chan, Alameda County Department of Environmental Health
Frank Gaunce, California - EPA, Department of Toxics Substances Control
Maria Banico, City of Oakland

October 19, 1993
StID #1453

Memo to the files

Re: October 18, 1993 Voice Message from Mike Webster, Ekotek Lube Site

I received a phone message on my voice mail which I will summarize. The call came in at 10:53 am from a Mike Webster. He identified himself as the son of a Mr. Larry Webster who is the owner of the Ecotek site. He requested any information which has been performed at the Ecotek site by EPA so that he can "determine what is required to clean-up the site." He then left his phone number, (310) 426-6503.

I was instructed by Gil Jensen, not to return the call and to refer any future call to him at the DA's office.

Bchan

STATE OF CALIFORNIA PETE WILSON, Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, SUITE 500
OAKLAND, CA 94612
(510) 286-1255

93 OCT 15 PM 12:29

October 14, 1993
File No. 2223.09(LF)

Brian Matsumura
City of Oakland
Office of Planning and Building
Building Services Department
1330 Broadway, 2nd Floor,
Oakland, CA 94612-2502

Subject: Proposed K-Mart - 3801 East 8th, Oakland

Dear Brian:

I have reviewed the environmental portion of the Draft Staff Report for the American Can Site proposed K-Mart development at 3801 East 8th Street in Oakland. Specifically, I concur with all water quality aspects of "Hazardous Materials Remediation and Demolition Plans" conditions. Compliance with these conditions will assure that groundwater and soil contamination will be remediated to the satisfaction of this Regional Board.

Please contact me at (510) 286-1332 if there are any questions.

Sincerely,

Lester Feldman,
Toxics Section Leader

cc: Barney Chan, Alameda County Department of Environmental Health

STATE OF CALIFORNIA PETE WILSON, Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, SUITE 500
OAKLAND, CA 94612
(510) 286-1255

93 OCT 15 PM 12:30

October 13, 1993
File: UST 01-0551(LF)

Lexa International Corporation
300 Atlantic Street,
Stamford, Connecticut 06901

and

Laurence and Diane Webster
P.O. Box 5309
Long Beach, CA 90805

Subject: Former Ekotek,Inc., Ekotek Lube Site - 4200 Alameda Ave., Oakland

Dear Sirs:

Our records indicate that a condition of pollution and nuisance exists at the subject property. We have no indication in our files as to whether this condition was ever properly investigated as required by the California Water Code. We have recently been informed that pollution has migrated from this property onto the property of American National Can located at 3801 East Eighth Street, Oakland.

This Office is charged with the responsibility under the California Water Code to protect the State's water quality. It does not appear that you have made a diligent effort to investigate and cleanup the soil and groundwater at your site. Therefore, pursuant to Section 13267 of the California Water Code you are hereby required to submit a Work Plan and time schedule delineating steps to be taken to define the horizontal and vertical extent of soil and groundwater pollution at the above referenced site. The investigative Work Plan is due to this office by December 1, 1993. You should be aware that failure to submit or late submittal may result in civil monetary penalties assessed by the Regional Board.

Please direct any questions concerning this matter to Richard Hiett or Lester Feldman of my staff at (510) 286-1332.

Sincerely

Steven R. Ritchie,
Executive Officer

cc: Gilbert Jensen, Alameda County District Attorney's Office
Barney Chan, Alameda County Department of Environmental Health
Frank Gaunce, California - EPA, Department of Toxics Substances Control
Maria Banico, City of Oakland

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

September 15, 1993
StID # 1453

Mr. Rich Hiett
RWQCB
2101 Webster St., Suite 500
Oakland CA 94612

Re: Recommendation for Case Closure for Areas 1 and 5 at the American National Can Site, 3801 E 8th St., Oakland CA 94601

Dear Rich:

As you are aware, this site has been divided into five distinct areas of investigation, each with their own release, investigation and remediation. Areas 1 and 5 are ones which appear to have performed sufficient investigation. Our office agreed to discontinue groundwater monitoring in these areas in January 1992. On August 16, 1993 we received a written request from ANNC's consultant for the formal closure of these two areas. After file review, my August 20, 1993 letter to Ms. Judith Peters of ANCC, requested additional technical reports. On September 8, 1993, I received a September 1, 1993 report from ANNC's consultant, RUST Environment and Infrastructure, formerly Dunn Corporation, replying to my request for technical reports. After review of this report, I concur that these two areas of this site should be considered closed. I would like to summarize these two areas for your evaluation.

Area 1 (You may want to look at a site map if one is available).

This area is on the north corner of the site where a 500 gallon gasoline tank was removed in December of 1990. The initial soil sample under the tank at 8' contained 350 ppm TPHg. A soil sample at 10' contained 1300 ppm TPHg and after further excavation, a soil sample from 12' contained 4.9 ppm TPHg, 7.5 ppb benzene and ND TEX. Total lead in soil samples ranged from 5.8-9 ppm. All stockpiled soils were hauled under manifest to Kettleman Hills for disposal. Monitoring well, MW-12, was installed downgradient to the former tank's location. Gradient has been consistent for the period of well sampling. Four consecutive quarters of groundwater monitoring has occurred from April 91 to January 92 and no detectable TPHg or BTEX has been found in any monitoring event. The monitoring well was appropriately screened.

Area 5

This area is located in the center of the site where steam cleaning was previously performed. In August 1989, Dames and Moore investigated this area by advancing two borings to the north and south of this area. One sample was ND for TRPH and VOCs while the other sample, SC-1-2C, detected 3200 ppm TRPH via Method 418.1. Dunn Corporation did their own investigation in March 91, attempting to verify this observation. They installed four borings around this area, one of which was very close to the location of SC-1-2C. Their results did not confirm the previous results. They found from 2-9 ppm TRPH via Method 418.1. Monitoring well, MW-11, was installed in 3/91 downgradient to this location to investigate potential groundwater impact. Gradient has been consistent for the time of the groundwater sampling. Four consecutive quarters of monitoring occurred from April 91 to January 92. No volatile, semi-volatiles or PCBs were ever detected in these samplings. In the 4/91 event, 6.8 ppm TRPH was detected. In the 10/91 event, 89 ppb TPHd was detected. In addition, in July of 1993 a boring,B-2, was installed within the middle of the steam cleaning area. No gasoline, diesel, volatile organics or semi-volatiles were found. Monitoring well, MW-11, was screened from 8.5-19.0 feet though groundwater elevation equilibrates to approximately 3.0 feet.

Please contact me at (510) 271-4530 if you have any questions. In accordance with the recent SWRQCB letter, I assume that if our office does not hear from you within 30 days, you have no objections to our decision for areas 1 and 5 closure.

Sincerely,

Barney Chan
Hazardous Materials Specialist

cc: E. Howell, files

Alameda County Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Rm. 200, Oakland, CA 94621
Ph: 510-271-4320

BILLING FOR SERVICES

StID# 1453

A. Site Name American National Com / EKotek Lube Phone

Site Address (If no address, description of area) 3801 E 8th st, 4200 Alameda Ave Oakland 94601
Number Street City Zip

Prior Business Name ..... Prior Owner's Name .....

B. Service Requestor Sonja Weissman, Crosby, Heafey, Roach & May 763-2000
Contact Person Company Name Phone

Billing Address 1999 Harrison st, Oakland CA 94612-3573
Number Street City Zip

Category of Service

..... Site Search
..... File Search
..... Other .....

#Hours 5 (Whole Hours Only) x $ 75. /Hr $ 375.-

#Copies _____ x $ _____ /Copy $ _____

_____ (Other) _____ x $ _____ $ _____

TOTAL CHARGE: $ 375.-

REMARKS: review of the above files performed by Alex Tolkach of Researchers
130 Townsend st. San Francisco CA 94107
(415) 543-9555
Start time 9:30 AM - 2:15 pm
1/2 hour lunch
0.5 hr. Telcon w/ ms weissman 1 obtain file

You will receive an invoice in accordance with Article II of Chapter 6, Title 3 of the Ordinance Code of Alameda Count

Service Requestor JOJO BARCENA (printed name) (signature) Date 9/7/93

HazMat Specialist Paul Smith (printed name) Paul M. Smith (signature) Date 9/7/93

HM Bill for Svcs 9/93 mk

COPIES: White: - Billing Yellow - Office Pink - Svc. Requestor

93 AUG 31 PM 3:05

August 30, 1993
File No. 2223.09(LF)

Mr. James Kessler
The Martin Group
One Sutter Street, Suite 500
San Francisco, CA 94104

Mr. James S. Moran
American National Can Company
Mail Suite 14C
8770 West Bryn Mawr Avenue
Chicago, Illinois 60631-3542

SUBJECT: Remedial Action Plan for 3801 E. 8th Street

Dear Sirs:

This letter is written to confirm guidance provided by Lester Feldman of my staff at meetings held on August 19, 1993 and July 7, 1993 regarding the lead agency status of the Regional Board for this site remediation. The staff of the Regional Board has discussed this case with representatives of the Department of Toxic Substances Control, the Alameda County Department of Environmental Health (ACDEH) and the City of Oakland.

Based upon the referenced meetings and these discussions my staff will act to coordinate your development of a remedial plan which involves completion of soil and groundwater investigations, development of a feasibility study of remedial alternatives, and a public health risk assessment for the subject site. My staff will work in close coordination with staff of the ACDEH to provide guidance as the documents are developed and in providing timely reviews and comments. I am anticipating that acceptance of the remedial plan will be in the form of a letter from the Regional Board staff after the ACDEH has provided final comments and recommendations.

In order to facilitate Regional Board staff involvement, we require participation in the Board's Cost-Recovery Program. I have directed staff to prepare the appropriate letter which you should receive shortly. Please coordinate program management with Lester Feldman at (510) 286-1332 and technical report issues with Richard Hiett at (510) 286-4359.

Sincerely,

Steven R. Ritchie,
Executive Officer

cc: Attached List

Mailing List for 3801 E. 8th, Oakland

Robert Creps, PES Environmental
Ariu Levi, ACDEH
Barney Chan, ACDEH
Ravi Arulanantham, ACDEH
Edward W. Alusow, Rust E & I
Maria Banico, City of Oakland Zoning Department
Shirley Stubblefield, City of Oakland
Brian Matsumura, City of Oakland
Frank Gaunce, Cal-EPA, Department of Toxic Substances Control

CROSBY, HEAFEY, ROACH & MAY
PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
1999 HARRISON STREET
OAKLAND, CALIFORNIA 94612-3573
(510) 763-2000 • (415) 986-3400
FAX (510) 273-8832

700 SOUTH FLOWER STREET, SUITE 2200
LOS ANGELES, CALIFORNIA 90017
(213) 896-8000
FAX (213) 896-8080

333 BUSH STREET, SUITE 2580
SAN FRANCISCO, CALIFORNIA 94104-2899
(415) 543-8700
FAX (415) 391-8269

MAILING ADDRESS:
POST OFFICE BOX 2084
OAKLAND, CALIFORNIA 94604-2084

Direct Dial (510) 466-6821

August 17, 1993

93 SEP -2 AM 11:48

Mr. Paul Smith
Alameda County Department
of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

Re: American National Can and Ekotek Lube Sites, Oakland, California
Our Reference No.: 18920.0001.0

Dear Mr. Smith:

Pursuant to our conversation on August 16, 1993, I again renew my request for an appointment to review your files on the following sites:

1. American National Can Packing
3801 East 8th Street
Oakland, CA 94601

2. Ekotek Lube
4200 Alameda Avenue
Oakland, CA 94601

I understand you will be contacting me to set up an appointment for me to review the file. I would like to bring my copy service at the time of the appointment to microfilm the entire contents of these files.

I agree to pay the County's $75 per hour fee for compiling the files and supervising the photocopying of the files.

Thank you for your attention to this matter. I look forward to hearing from you soon.

Very truly yours,

Sonja S. Weissman

SSW/jt

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

August 20, 1993
StID 1453

American National Can Company
Ms. Judith Peters
8770 W. Bryn Mahr Ave.
Chicago IL 60631

Re: Status of Subsurface Investigation in Areas 1 and 5 at ANNC Site at 3801 E. 8th St., Oakland CA 94601

Dear Ms. Peters:

Our office is in receipt of the August 11, 1993 letters from Mr. Edward Alusow of RUST Environment and Infrastructure Inc. These letters request a written confirmation from our agency that no further work be required in these two areas of the former ANCC site. Recall, our office had informally approved of the discontinuance of groundwater monitoring in these areas in our April 28, 1992 letter but had never officially "closed" these areas.

In these August 11th letters, data is referred to which supports the belief that adequate work has been done for these areas. Upon review of the data within the County's files, it appears that we are missing some of the data which will enable our office to make a recommendation. Please provide the following information for the respective areas so that we can make a decision on these areas:

Area 1: This area in the northwest corner of the property reportedly had a gasoline tank removed but no tank closure report nor sample data is available to document the removal. Three test borings were advanced around the perimeter of the former tank and a monitoring well, MW-12, was installed downgradient to the tank location and monitored quarterly. Please provide copies of the following:
a. Analytical results and a site map for the three test borings
b. Monitoring well log and soil boring results for MW-12
c. All groundwater monitoring well results for MW-12, we are in receipt of the July and October 1991 monitoring results only.

Area 5: This area, on the southwest side of the site where steam cleaning occurred, was investigated for surface spillage problems. An investigation performed by Dames and Moore in 8/89 identified one soil boring sample, SC-1-2C, which exhibited 3200 ppm total petroleum hydrocarbons via method 418.1. Our office is in receipt of the August 7, 1991 report describing the results of three hand auger borings in the immediate vicinity of the steam cleaning facility which indicate little to no petroleum contamination.

The August 11, 1993 letter states that a test boring, B-2, was advanced on July 20, 1993 through the base of the storm water catch basin within the center of the steam cleaning area. The boring near the location of SC-1-2C did not find similar contamination as to that previously found. The monitoring well, MW-11, downgradient to this area apparently has been monitored for a year. Please provide the following information:

a. monitoring well log and soil sample boring results for MW-11.
b. provide a sampling map and analytical results for test boring, B-2.
c. provide a summary of all analytical results for groundwater sampling for MW-11. Our office has the monitoring results for 7/91 and 10/91 only.

We realize that these areas have been informally closed, however, because you are requesting formal written closure of these two areas within this site, the requested reports and documents are necessary for our office's evaluation.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: R. Hiett, RWQCB
E. Alusow, RUST Environment & Infrastructure, 12 Metro Park Road, Albany, NY 12205
J. Moran, ANNC
R. Arulanantham, ACDEH
E. Howell, files

1&5-3801E8

E. Howell, file

Am Nat'l Can, Oakland

Mtg of 8/19/93

Name	Affiliation	Phone #
Lester Feldman	RWQCB #2	(510) 286-1332
Ariu Levi	Allo Hazlat	510-271-4320
Brian Matsumura	City of Oakland	510 238-3882
~~Tomasio de la Fuente~~	City of Oakland	510-238-3266
Maria Banuso	Zoning City of Oakland	238-2979
~~Shirley Stubblefield~~	City of Oakland	238-3325
Barney Chan	ACHSA-LOP	510 271-4530
Edward W. Alusow	RUST E+I	518-458-1313
Joe Moran	American National Can	(312)399-3658
Rob Creps	PES Environmental	(415) 899-1600
Jim Kessler	Martin Group	(415) 772-5900
Ravi Arulanantham	ACDEH	271-4320

PES Environmental, Inc.
Engineering & Environmental Services

MEMORANDUM

To (by facsimile): Lester Feldman - S. F. Bay Regional Water Quality Control
Barney Chan - Alameda County Dept. of Env. Health
Ravi Arulanantham - Alameda Co. Dept. of Env. Health
Frank Gaunce - Cal-EPA Dept. of Toxic Substance Control
Jim Rinehart - City of Oakland
Jim Kessler - The Martin Group
Joe Moran - American National Can Co.
Ed Alusow - RUST Environment

From: Rob Creps - PES Environmental, Inc.

Date: August 13, 1993

Re: Project Status Meeting, American National Can Company - Oakland, California

---

As you know, development and remedial planning at the American National Can Company site is moving along at a rapid pace. To facilitate communication among the many parties, Lester has suggested that we hold regular project status meetings. The first has been scheduled for 1:30pm on Thursday, August 19, 1993. Lester has offered to provide a conference room at the RWQCB offices at 2101 Webster Street, Oakland. Go to the 5th floor reception area to get the conference room location.

The main purpose of the meeting is to update the status of the remedial planning process. American Can Company will also cover the status of the risk assessment activities and Martin/Oakland will describe the status of the EIR/Negative Declaration process.

Please call me at (415) 899-1600 if you have any questions.

8/12/93

Barney,

I went to a meeting yesterday at the DA's with Bill. Since they want to build a 105,000 ft² super K mart on Am. National com property. EPA has agreed to do a phase one & two on Tech Lube.

They would like access to the files for Am Can. I told them to come on down.

I will be on vacation next week except for Mon.

I gave Bill Lewis of EPA your name

His ph # is (415) 744-2292

Please help him. I know you will.

Thanks

Pam

RUST ENVIRONMENT & INFRASTRUCTURE

Formerly DUNN Corporation

RUST Environment & Infrastructure Inc
12 Metro Park Road
Albany, NY 12205
Tel. (518) 458-1313 • FAX (518) 458-2472

93 AUG 16 PM 12:52

August 11, 1993

Oct 91 89ppb d

Mr. Barney M. Chan
Hazardous Materials Specialist
Department of Environmental Health
80 Swan Way
Oakland, California 94621

Subject: American National Can Company
Oakland, California, Facility

In the summer of 1991, RUST Environment and Infrastructure, Inc. (RUST) (formerly Dunn Corporation) completed a subsurface investigation at the referenced site. At the request of your agency, that investigation included an assessment of soil and groundwater quality in the vicinity of a former steam cleaner facility (Area 5).

The investigation in Area 5 included the analysis of four soil samples collected from two test borings located immediately adjacent to the steam cleaner facility; and, the installation and quarterly sampling of one downgradient monitoring well (MW-11). In a letter dated August 7, 1991, we forwarded, to your agency, analytical results of soil samples collected from three hand auger borings also advanced in the immediate vicinity of the former steam cleaner facility. On July 20, 1993, RUST completed a test boring (B-2) through the base of the storm water catch basin, located in the center of the steam cleaner facility, to evaluate soil quality immediately beneath the facility. Attached for your review is a map showing the location of boring B-2, a test boring log and a copy of the analytical results of the two soil samples analyzed.

In our Subsurface Investigation Summary Report, submitted to your agency in June, 1992, we concluded that there was no significant impact to soil or groundwater in the vicinity of the steam cleaner. We continued groundwater monitoring through January, 1992 at which time four consecutive rounds of data showed that there has been no significant impact to groundwater quality in the Area. Analytical results from the recent test boring (B-2) also shows that there is no impact to the soil immediately beneath the steam cleaner facility.

In a letter dated April 28, 1992, your agency approved our request to discontinue quarterly groundwater monitoring of MW-11. However, at this time, we request written confirmation that your agency considers Area 5 of the site closed from any further requirements for investigatory or remedial activity.

If you have any questions, please contact me at (518) 458-1313. We look forward to your reply.

Very truly yours,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

EWA/mhh

c: J. Moran
J. Peters ANCC, 8770 W. Bryn Mahr Ave Chicago IL 60631
L. Feldman

RUST ENVIRONMENT & INFRASTRUCTURE

Formerly DUNN Corporation

RUST Environment & Infrastructure Inc.
12 Metro Park Road
Albany, NY 12205
Tel. (518) 458-1313 • FAX (518) 458-2472

93 AUG 16 PM 12:52

August 11, 1993

Mr. Barney M. Chan
Hazardous Materials Specialist
Department of Environmental Health
80 Swan Way
Oakland, California 94621

Subject: American National Can Company
Oakland, California, Facility

In the summer of 1991, RUST Environment and Infrastructure, Inc. (RUST) (formerly Dunn Corporation) completed a subsurface investigation at the referenced site. At the request of your agency, that investigation included an assessment of soil and groundwater quality in the vicinity of a previously removed (December, 1990) gasoline underground storage tank (Area 1).

The investigation in Area 1 included the analysis of six soil samples collected from 3 test borings around the immediate perimeter of the tank; and, the installation and quarterly sampling of one downgradient groundwater monitoring well (MW-12).

We concluded in our Subsurface Investigation Report that, in areal, there was only a minimal amount of residual soil impact and that groundwater quality was not impacted. We continued quarterly groundwater monitoring through January, 1992 at which time four consecutive rounds of data ~~should~~ showed that there has been no groundwater impact in the Area.

In a letter dated April 28, 1992, your agency approved our request to discontinue quarterly groundwater monitoring of MW-12. However, at this time, we request written confirmation that your agency considers Area 1 of the site closed from any further investigatory or remedial activity.

If you have any questions, please contact me at (518) 458-1313. We look forward to your reply.

Very truly yours,

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

EWA/mhh

c: J. Moran
J. Peters
L. Feldman

TABLE 4-10
AMERICAN NATIONAL CAN COMPANY
OAKLAND, CALIFORNIA, FACILITY
Summary of Detected Total Petroleum Hydrocarbons, PCBs, and Metals in Groundwater
July 1991

	AREA 1		AREA 2		AREA 3										AREA 4					
Soil Boring Number	SB-15		SB-19		SB-2	SB-3	SB-4	MW-3	SB-5	DUP	SB-6	SB-7	SB-8		SB-9	SB-10	SB-11			
Monitoring Well Number	MW-12	GW-5	MW-13	GW-6	MW-1	MW-2	MW-3	DUP	MW-4	X-1	MW-5	MW-6	MW-7	GW-2	MW-8	MW-9	MW-10	GW-3		
TPH as gasoline (DHS method) (ug/l)	nd	nd	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
BTEX																				
Benzene	nd	nd	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Toluene	nd	nd	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Ethylbenzene	nd	nd	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Total Xylenes	nd	nd	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TPH as diesel (DHS method) (ug/l)	--	--	500	29,000	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
PCB (EPA 8080) (ug/l)																				
Aroclor-1260	--	--	nd	nd	2.4	6.0	nd	--	nd	nd	2.0	nd	nd	nd	nd	nd	nd	nd	nd	nd
Metals (ug/l)																				
Arsenic (total)	--	--	--	--	12.3	48.9	25.0	21.4	33.1	38.1	43.1	nd	nd	nd	nd	nd	16.9	52.3	--	--
Arsenic (filtered)	--	--	--	--	nd	42.1	23.2	--	31.8	31.2	39.5	nd	nd	nd	nd	nd	10.3	43.4	--	--
Barium (total)	--	--	--	--	200	213	213	214	633	573	644	129	269	580	108	209	nd	285	--	--
Barium (filtered)	--	--	--	--	187	195	151	--	541	482	536	nd	189	479	101	142	nd	231	--	--
Chromium (total)	--	--	nd	nd	--	--	--	--	--	--	--	--	--	--	nd	13.8	nd	nd	--	--
Chromium (filtered)	--	--	nd	nd	--	--	--	--	--	--	--	--	--	--	nd	nd	nd	nd	--	--
Nickel (total)	--	--	73.3	nd	nd	109	nd	nd	nd	nd	41.6	nd	100	nd	nd	71.5	nd	nd	--	--
Nickel (filtered)	--	--	51.4	nd	nd	101	nd	--	nd	nd	nd	nd	51.3	nd	nd	nd	nd	nd	--	--
Zinc (total)	--	--	8740	nd	25.0	41.6	28.0	27.0	nd	nd	36.0	nd	24.8	nd	31.9	30.6	nd	28.8	48.3	nd
Zinc (filtered)	--	--	7410	nd	29.7	30.4	nd	--	nd	nd	nd	nd	23.1	nd	49.4	24.8	nd	82.1	23.3	nd
Lead (total)	--	--	nd	5.0	3.1	8.0	nd	nd	4.0	6.4	4.1	nd	5.5	4.0	nd	4.3	nd	27.2	3.2	nd
Lead (filtered)	--	--	nd	nd	11.6	nd	nd	--	4.2	4.6	nd	nd	nd	4.3	nd	nd	nd	4.1	nd	nd
Silver (total)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	nd	nd	12.1	15.7	--	--
Silver (filtered)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	nd	nd	28.3	11.7	--	--

-- indicates compound was not analyzed.
nd indicates compound was not detected.

(Labels) circled in Chevron

TABLE 4-10
AMERICAN NATIONAL CAN COMPANY
OAKLAND, CALIFORNIA, FACILITY
Summary of Detected Total Petroleum Hydrocarbons, PCBs, and Metals in Groundwater
October 1991

	AREA 1	AREA 2			AREA 3							AREA 4						AREA 5
Soil Boring Number	SB-15	SB-19			SB-2	SB-4	SB-5				DUP	SB-9	SB-10	SB-11				SB-14
Monitoring Well Number	MW-12	MW-13	MW-15	TW-1	MW-1	MW-3	MW-4	MW-6	MW-7	GW-2	X-1	MW-8	MW-9	MW-10	MW-14	MW-16	GW-3	MW-11
TPH as gasoline (EPA method 5030)(ug/l)	nd	nd	nd	nd	2300	950	2300	nd	58	910	820	--	--	--	--	--	--	nd
BTEX (624) (ug/l)																		
Benzene	nd	nd	nd	nd	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Toluene	nd	nd	nd	nd	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Ethylbenzene	nd	nd	nd	nd	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Total Xylenes	nd	nd	nd	nd	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TPH as diesel (EPA method 3510) (ug/l)	--	200	260	680	1000	7000	6100	nd	100	6200	7400	--	--	--	--	--	--	89
Total Oil & Grease (EPA method 5520)(mg/l)	--	--	--	--	nd	21	13	nd	nd	18	17	--	--	--	--	--	--	--
PCB(EPA 8080)(ug/l)																		
Aroclor-1260	--	--	--	--	3.3	nd	nd	nd	nd	nd	nd	--	--	--	--	--	--	--
Metals (ug/l)																		
Arsenic (total)	--	--	--	--	14.4	35.1	41.2	nd	nd	nd	nd	nd	nd	nd	14.1	nd	20.0	--
Arsenic (filtered)	--	--	--	--	11.9	33.0	36.6	nd	nd	nd	nd	nd	nd	nd	12.3	nd	20.4	--
Barium (total)	--	--	--	--	268	237	733	nd	314	580	597	nd	250	nd	232	255.0	282	--
Barium (filtered)	--	--	--	--	276	nd	606	nd	210	501	524	nd	nd	nd	nd	nd	244	--
Chromium (total)	--	--	--	--	--	--	--	--	--	--	--	nd	nd	nd	nd	nd	nd	--
Chromium (filtered)	--	--	--	--	--	--	--	--	--	--	--	nd	nd	11.1	nd	nd	nd	--
Nickel (total)	--	170	82.7	nd	nd	nd	nd	nd	84.8	nd	nd	nd	56.7	nd	nd	96.5	nd	--
Nickel (filtered)	--	55.9	nd	nd	nd	nd	nd	nd	40.5	nd	nd	nd	42.6	nd	nd	nd	nd	--
Zinc (total)	--	10300	55.9	24.0	nd	55.3	nd	nd	nd	nd	nd	nd	nd	nd	nd	46.2	nd	--
Zinc (filtered)	--	6880	21.8	26.9	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	24.9	nd	--
Lead (total)	--	--	--	--	nd	nd	nd	nd	nd	nd	12.3	10.4	nd	nd	nd	10.1	5.0	nd
Lead (filtered)	--	--	--	--	nd	nd	nd	nd	nd	nd	nd	nd	3.5	nd	5.5	nd	3.1	3.7
Silver (total)	--	--	--		--	--	--	--	--	--	--	nd	nd	nd	nd	nd	nd	--
Silver (filtered)	--	--	--		--	--	--	--	--	--	--	nd	nd	nd	nd	nd	nd	--

-- indicates compound was not analyzed.
nd indicates compound was not detected.

8/11/93

meeting at Ala Co DA's office

Sign in Sheet

Bob Olsen	DTSC Legal	510-540-3917
FRANK GALVICE	DTSC SITE MITIGATION	510-540-3854
Bill Lewis	U.S. EPA	(415) 744-2292
Paul Martin	EPA TAT	(415) 777-2811
Lester Feldman	RWQCB #2	510 286-1332
Pam Evans	Ala Co Haz Mat Div	510 271 4320
BRETT JOHNSON	ALCO HAZ MAT	(510) 271-4320
Paul M. Smith	" "	
Ravi Arulanantham	ACDEH	510-271-4320
GIL JENSEN	ALAMEDA CO. DA	(510) 569-9281
Dennis Byrne	Alameda Co DA	(510) 569-9281
Stacy Hoog	City of Oakland ED office	(510) 238-3015
Clayton Collins	Employment Development	(510) 238-3015

Alameda County Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Rm. 200, Oakland, CA 94621
Ph: 510-271-4320

BILLING FOR SERVICES

StID# .....

A. Site Name Various sites in Oakland 94601 & 94607 Phone .....

Site Address (If no address, description of area) See attachments (3 pages) .....
Number Street City Zip

Prior Business Name ..... Prior Owner's Name .....

B. Service Requestor Mary Williams, PES Environmental, Inc. (415) 899-1600
Contact Person Company Name Phone

Billing Address 1682 Novato Blvd., Suite 100, Novato, CA 94947
Number Street City Zip

Category of Service

..... Site Search
X File Search
..... Other .....

#Hours (Whole Hours Only)	~~3.0~~ 5.0	x $ 75. /Hr	$	375.-
#Copies	65	x $ 1.- /Copy	$	65
Other		x $	$	
		TOTAL CHARGE:	$	440.-

REMARKS: coordinate site search file records from staff 1.5 hrs
site search start time 9:10 AM
finish 12:00 pm
pulled 1 additional file Emeryville Market Place 94607 0.5

You will receive an invoice in accordance with Article 11 of Chapter 6, Title 3 of the Ordinance Code of Alameda County

Service Requestor Mary Williams (printed name) Mary Williams (signature) Date 7/27/93

HazMat Specialist Paul M. Smith (printed name) Paul M. Smith (signature) Date 7/27/93

5.0

HM Bill for Svcs 4/92 mk

COPIES: White: - Billing Yellow - Office Pink - Svc. Requestor

PES Environmental, Inc.

- ✓ • Guy's Service, 3820 San Leandro St, Oakland 94601

BC3682 NO • Motor Partners, 1234 40th Ave, Oakland 94601

BC86 (ML) • Shell, 3750 14th St, Oakland 94601

Thanks,

Mary Wellcan

also included Emery Bay Market Place, Emeryville 94607

PES Environmental, Inc.
Engineering & Environmental Services

called 7/6/93
I left message with Mary Williams to call me
need
① acknowledgement of fee structure
② a specified limit of time/money expenditure

PES ENVIRONMENTAL, INC.
TEL: (415) 899-1600

FAX: (415) 899-1601

TO: Paul Smith

COMPANY: Alameda County Dept. of Health

FAX NO: (510) 569-4757

PHONE NO: (510) 271-4320

FROM: Mary Williams

JOB NO:

RE: Request for additional files

DATE: 7/2/93 **TIME:** _____ **SENT BY:** MW

NUMBER OF PAGES 2 **HARD COPY TO FOLLOW: YES** ___ **NO** ✓
(INCLUDING COVER SHEET)

NOTES: Paul - I'd like to add the following sites to the list I faxed on June 30:

KT
BC1140 ✓ (ML)
- Unocal, 4251 E. 14th St, Oakland 94601

BC ~~1140~~ 2 ✓
- West Coast Floor Coverings, 1468 44th Ave, Oakland 94601

BC4402 no
- Everett Stern Property, 1033 44th Ave, Oakland 94601

✓ (ML)
- Continental Volvo, 4030 E. 14th St. 94601

Baywood Center • 1682 Novato Boulevard • Suite 100 • Novato, California 94947

needs all files
scheduled for 7/21/93
9:AM

7/6/93 talked w Mary
requested that she acknowledge fee & specify a ceiling. said will fax

PES Environmental, Inc.
Engineering & Environmental Services

PES ENVIRONMENTAL, INC.
TEL: (415) 899-1600

FAX: (415) 899-1601

TO: Paul Smith

COMPANY: Alameda County - Environmental Health

FAX NO: (510) 569-4757

PHONE NO:

FROM: Mary Williams

JOB NO:

RE: Request for file review

DATE: 6/30/93 TIME: 4:20 SENT BY: MW

NUMBER OF PAGES 3 HARD COPY TO FOLLOW: YES ___ NO ✓
(INCLUDING COVER SHEET)

NOTES:

IF THIS TRANSMITTAL HAS BEEN RECEIVED IN ERROR
PLEASE CONTACT
PES ENVIRONMENTAL AT YOUR EARLIEST CONVENIENCE (415) 899-1600

Baywood Center • 1682 Novato Boulevard • Suite 100 • Novato, California 94947

PES Environmental, Inc.
Engineering & Environmental Services

site search start time prop pull tbw
7/22 1:40

June 30, 1993

Mr. Paul Smith
Alameda County Department of Health
Hazardous Materials Division
80 Swan Way
Oakland, California

RE: REQUEST FOR FILE REVIEWS

Dear Mr. Smith:

I'm interested in reviewing Alameda County Agency file information for the sites indicated below. In particular, I'm interested in underground storage tank, remedial work, and hazardous materials information for these sites.

BC 1453 ✓ • American Can Company (aka American National Can), 3801 East 8th Street, Oakland 94601

no • Bayside Oil Co., 4200 Alameda Ave., Oakland 94601

BC4249 ✓ • Chevron, 3616 San Leandro St., Oakland 94601

RWB lead ✓ • Clorox Company, 850 42nd Street, Oakland 94601

— no • Eko-Tek, Inc. (aka Ekotek Lube), 4200 Alameda Ave., Oakland 94601

BC 3586 ✓ • U.S. Cold Storage, 3925 Alameda Ave., Oakland 94601

ML (Owner w/ BAY?) BC4440 • Eds Auto Wreckers (aka Hatten Property), 752 High Street, Oakland 94601

BC 136 ✓ • Exxon, 720 High Street, Oakland 94601

ASH Barney — no (dupref 4/88 RL) • Learner Company, 3675 Alameda Ave., Oakland 94601 768 46R Ave

BC3737 ✓ (ML) • Shell (aka Suds Machine, Inc), 630 High St., Oakland 94601

— ✓ (PE) • Waste Oil Recovery Systems, 801 High St., Oakland 94601

1

18 sites

1682 Novato Boulevard • Suite 100 • Novato, California 94947 • (415) 899-1600 • FAX (415) 899-1601

All of these facilities are located in the 94601 Zip Code. Please contact me at your earliest convenience to arrange an appointment to review these files. Thanks for your help.

Very truly yours,

PES ENVIRONMENTAL, INC.

Mary E. Williams

Mary E. Williams
Senior Staff Environmental Scientist

PES Environmental, Inc.
Engineering & Environmental Services

PES ENVIRONMENTAL, INC.
TEL: (415) 899-1600

FAX: (415) 899-1601

TO: Paul Smith

COMPANY: Alameda County Division of Environmental Health

FAX NO: (510) 569-4757

PHONE NO: (510) 271-4320

FROM: Mary Williams

JOB NO:

RE: File Review

DATE: 7/8/93 **TIME:** 3:00 **SENT BY:** MW

NUMBER OF PAGES 1 **HARD COPY TO FOLLOW: YES** ____ **NO** ✓
(INCLUDING COVER SHEET)

NOTES: Paul - Per our discussion, the purpose of this FAX is to acknowledge your fee schedule of $75.-/hr and $1.-/page for copies. I understand that these fees are associated with my file review requests of 6/30/93 and 7/2/93. I would like to set a cap on the total amount spent for this work at $300.-. Thanks for your help.

Mary Williams

IF THIS TRANSMITTAL HAS BEEN RECEIVED IN ERROR
PLEASE CONTACT
PES ENVIRONMENTAL AT YOUR EARLIEST CONVENIENCE (415) 899-1600

Baywood Center • 1682 Novato Boulevard • Suite 100 • Novato, California 94947

PES Environmental, Inc.
Engineering & Environmental Services

PES ENVIRONMENTAL, INC.
TEL: (415) 899-1600

FAX: (415) 899-1601

TO: BARNEY CHAN

COMPANY: ALAMEDA COUNTY D.E.H.

FAX NO: 510 - 569 - 9757

PHONE NO:

FROM: ROB CHEPS

JOB NO: 241.05.01.01

RE: American National Can Co.

DATE: 7/7 **TIME:** **SENT BY:** RSC

NUMBER OF PAGES 2 **HARD COPY TO FOLLOW:** YES X NO
(INCLUDING COVER SHEET)

NOTES:

IF THIS TRANSMITTAL HAS BEEN RECEIVED IN ERROR
PLEASE CONTACT
PES ENVIRONMENTAL AT YOUR EARLIEST CONVENIENCE (415) 899-1600

Baywood Center • 1682 Novato Boulevard • Suite 100 • Novato, California 94947

MEETING AGENDA
July 7, 1993
American National Can Company
Oakland Facility

I. Introduction

- Overview of proposed development project
- Objectives of today's meeting

II. Administrative Issues

- Regulatory agency oversight of remediation

III. Summary of Previous Investigations and Remediation

IV. Status of Ekotek Lube Site (Area 3)

V. Conceptual Remediation Program

VI. Schedule of Remediation and Development

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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 5, 1993
StID# 1453

Ms. Judith Peters
American National Can Company
8770 W. Bryn Mawr Ave.
Chicago, Il 60631

Re: Required Actions for Area 3 at American National Can, 3801 E. 8th St., Oakland CA 94601.

Dear Ms. Peters:

This letter serves to clarify the requirements of American National Can (ANC) in regards to Area 3 at the above site. This area is adjacent to Ekotek Lube and is being affected by the contamination migrating from this site. In an effort to clarify ANC's responsibilities, I contacted Mr. Walter Howard of Dunn Corporation and Mr. Eddy So of the Regional Water Quality Control Board (RWQCB). It was agreed that the contamination being found in monitoring wells within Area 3 is likely from Ekotek Lube and ANC will not be required to remediate this affected soil and groundwater. Ekotek Lube has gone bankrupt and no responsible parties have been identified to remediate their site. The modified sampling schedule approved by Mr. Dennis Byrne on 4/28/92 is accepted with the following condition for Area 3. ANC must, on an regular schedule, bail any free product from wells, GW-2, MW-3, MW-2 and GW-1. These wells cannot be abandoned with the knowledge that free product possibly exists in them per the Porter-Cologne Water Quality Act. These wells should be inspected at least quarterly to determine the presence of free product. It was also decided that no formal report will be needed to document that Ekotek Lube is the responsible party for Area 3's contamination. However, in the event the Ekotek Lube site is taken by DTSC (Department of Toxics Substance Control) (State Superfund) for remediation they may request documentation beyond the County's opinion regarding the source of ANC's contamination in Area 3 therefore documentation is highly recommended.

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
W. Howard, Dunn Corp., 12 Metro Park Road, Albany, New York 12205
E. So, RWQCB
E. Howell, files EBH 2-3801ANC

Alameda County Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Rm. 200, Oakland, CA 94621
Ph: 510-271-4320

BILLING FOR SERVICES

StID# 1453

A. Site Name US Cold Storage / American National Can Company Phone

Site Address (If no address, description of area) 3925 Alameda Ave, Oakland 94601 / 3801 E. 8th St Oakland 94601
Number Street City Zip

Prior Business Name ..... Prior Owner's Name .....

B. Service Requestor Eric Harrell (Contact Person) Engeo Incorporated (Company Name) (510) 838-1600 (Phone)

Billing Address 2401 Crow Canyon Road, Suite 200, San Ramon, CA 94583-1545
Number Street City Zip

Category of Service

X Site Search

..... File Search

..... Other .....

#Hours 1.0 (Whole Hours Only) x $ 71./Hr $ 71.00

#Copies _____ x $ _____/Copy $ _____

_____ (Other) _____ x $ _____ $ _____

TOTAL CHARGE: $ 71.00

REMARKS: Start 8:45 finish 9:10

You will receive an invoice in accordance with Article 11 of Chapter 6, Title 3 of the Ordinance Code of Alameda County

Service Requestor Eric Harrell (printed name) Eric Harrell (signature) Date 1/6/93

HazMat Specialist Paul Smith (printed name) Paul M. Smith (signature) Date 1/6/93

HM Bill for Svcs 4/92 mk

COPIES: White: - Billing Yellow - Office Pink - Svc. Requestor

ENGEO
INCORPORATED

DRAFT

GEOTECHNICAL & ENVIRONMENTAL CONSULTANTS

In Reply
Please Refer to:
3614-F1

December 14, 1992

Alameda County Health Agency
Department of Environmental Health
Division of Hazardous Materials
80 Swan Way, Room 200
Oakland, CA 94621

Attention: Paul Smith

Subject: 3925 Alameda Avenue
Oakland, California

UNDERGROUND TANK/HAZARDOUS WASTE SITES

Dear Mr. Smith:

ENGEO Incorporated is presently under contract to conduct an environmental site assessment of the subject property located in Oakland, California. In association with this assessment we would like to review the following files for the information listed:

Facility	Address	Zip Code	Information Required
U.S. Cold Storage	3925 Alameda Avenue	94601	Underground Storage Tank and Site Mitigation
American National Can Company	3801 East Eighth Street	94601	Site Mitigation or Monitoring Reports dated after April 27, 1992.

RO 797-CL

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 19, 1992
STID # 1453

Ms. Judith Peters
American National Can Company
5770 W. Bryn Mawr Ave.
Chicago, IL 60631

Re: Subsurface Investigation at American National Can,
3801 E. 8th St., Oakland CA 94601

Dear Ms. Peters:

This letter serves to summarize my conversation today with Mr. Walter Howard of Dunn Corporation. This conversation covered the discussion of the soil sample results taken after overexcavation in Area 4 at the above site. It was agreed that within this recently excavated area, the only area of significant soil contamination was around soil sample 13. It was also acknowledged that further excavation was not possible due to the existence of water lines and a storm drain. I, therefore, gave verbal approval to backfill the excavated area with clean backfill. The groundwater in the vicinity of soil sample 13 should be monitored quarterly in MW-8 for TPHg and BTEX.

Mr. Howard also stated that he had performed a pump test on GW-3 and that the concentrations of dissolved hydrocarbons had decreased significantly. Because of this, the initiation of the proposed groundwater extraction system will be on hold pending further groundwater monitoring. This approach is acceptable on the condition that this data is provided to our office and we concur with his conclusion. I understand a pump test will also be done on GW-6 in Area 2 to see if this same effect is observed.

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

Sincerely,

Barney M Chan

Barney M. Chan
Hazardous Materials Specialist

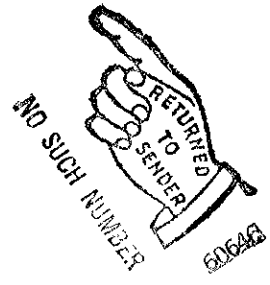
cc: R. Hiett, RWQCB
W. Howard, Dunn Corporation, 12 Metro Park Road, Albany, New York 12205
E. Howell, files
2-3801E8th

ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY

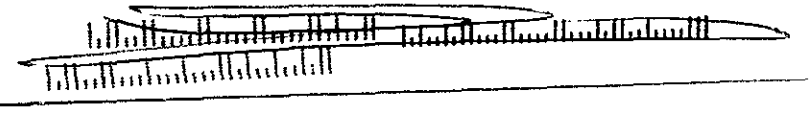
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621

CHICAGO, IL. 09:42 11/25/92 #8

NSN



Ms. Judith Peters
American National Can Company
5770 W. Bryn Mawr Avenue
Chicago IL 60631



ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

(1)

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

Hazardous Materials Division Inspection Form

I

Site ID# _____ Site Name Am Nat Gas Today's Date 10/28/9

Site Address 3801 E 8th EPA ID# _____

City Oak Zip 94601 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)

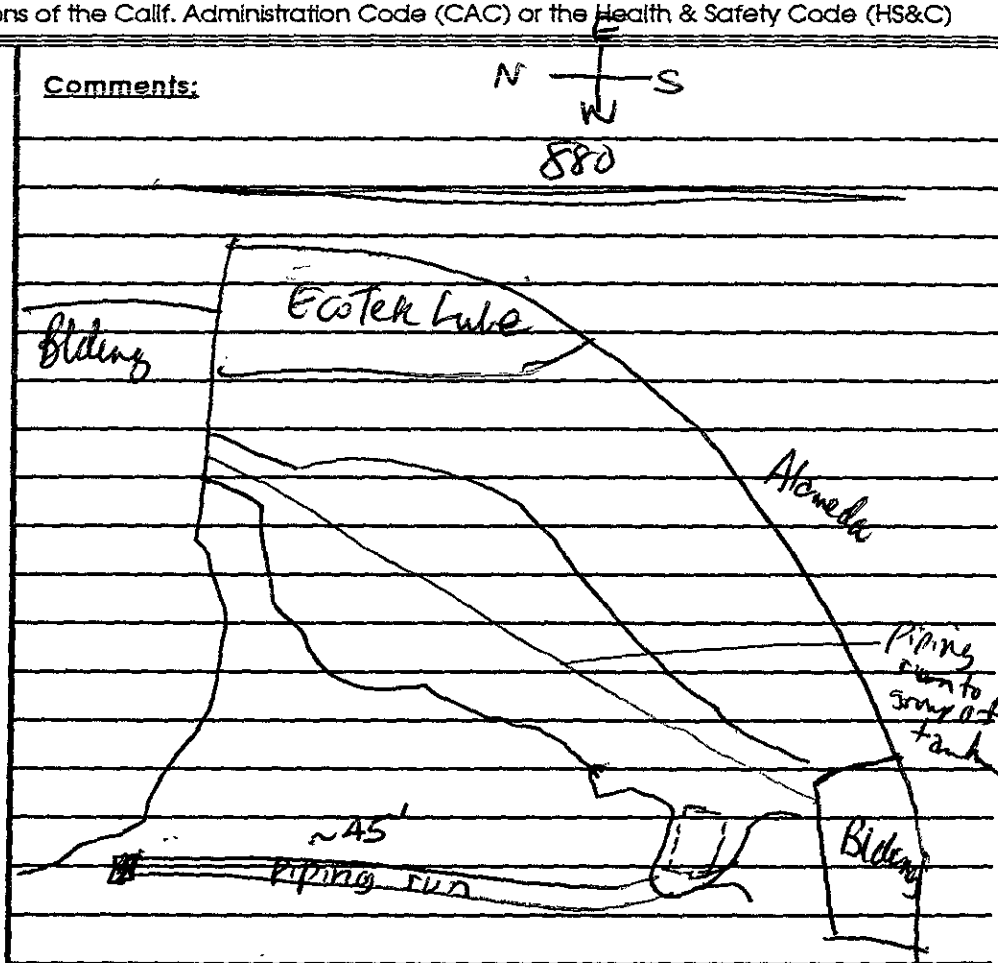
I.A GENERATOR (Title 22)

	___ 1. Waste ID	* 66471
	___ 2. EPA ID	66472
	___ 3. > 90 days	66508
	___ 4. Label dates	66508
	___ 5. Biennial	66493
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
	___ 18. Training	67105
Contin. gency	___ 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

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
Cont'rs	___ 40. Name/ Covers	66545
	___ 41. Recyclables	66800

Comments:



W. Howard of Dunn present - Riedel contractor who removed tank. Will perform 2 soil gas survey to determine if the piping leaked ~ every 10' & Sample 2 Tedlar bags for analysis
- some solvenly odors & pet. Hc odors noticed w/ excavation!
W. Howard approve 500 yds of excavated soils stockpiled over

Rev 6/88

Contact: W. Howard Title: _____ Signature: Walter O. Howard

Inspector: BCha Signature: BCha

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 Nat Can Today's Date 6/28/92

Site Address 3801 E 8th EPA ID# _____

City Oak Zip 94601 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
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
	18. Training	67105
Contin. gency	19. Prepared	67140
	20. Name List	67141
	21. Copies	67141
	22. Emg. Coord. Trng.	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

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
Cont'rs	40. Name/ Covers	66545
	41. Recyclables	66800

Comments:

Witnessed sampling from under piping and on north & south side of excavation at the approx midpt and depth of the excavation locations determined by screening w/ PID. Those locations < 50 or 10 ppm sampled
- I'm concerned whether the analysis parameters are correct (CHCs + BTEX) as the tanks contained solvents of some type.
Samples taken w/ trowel & hand packed into ~ 4oz glass bottles. Lab = Anametrix
- Pit was lined w/ visqueen after sampling
- will consider remediation of stockpiled soils
No separate tank closure report to be issued just included in report of Area 4 soils investigation.

Sampling map on the W.P proposal submitted to our office & okayed by D. Byrne

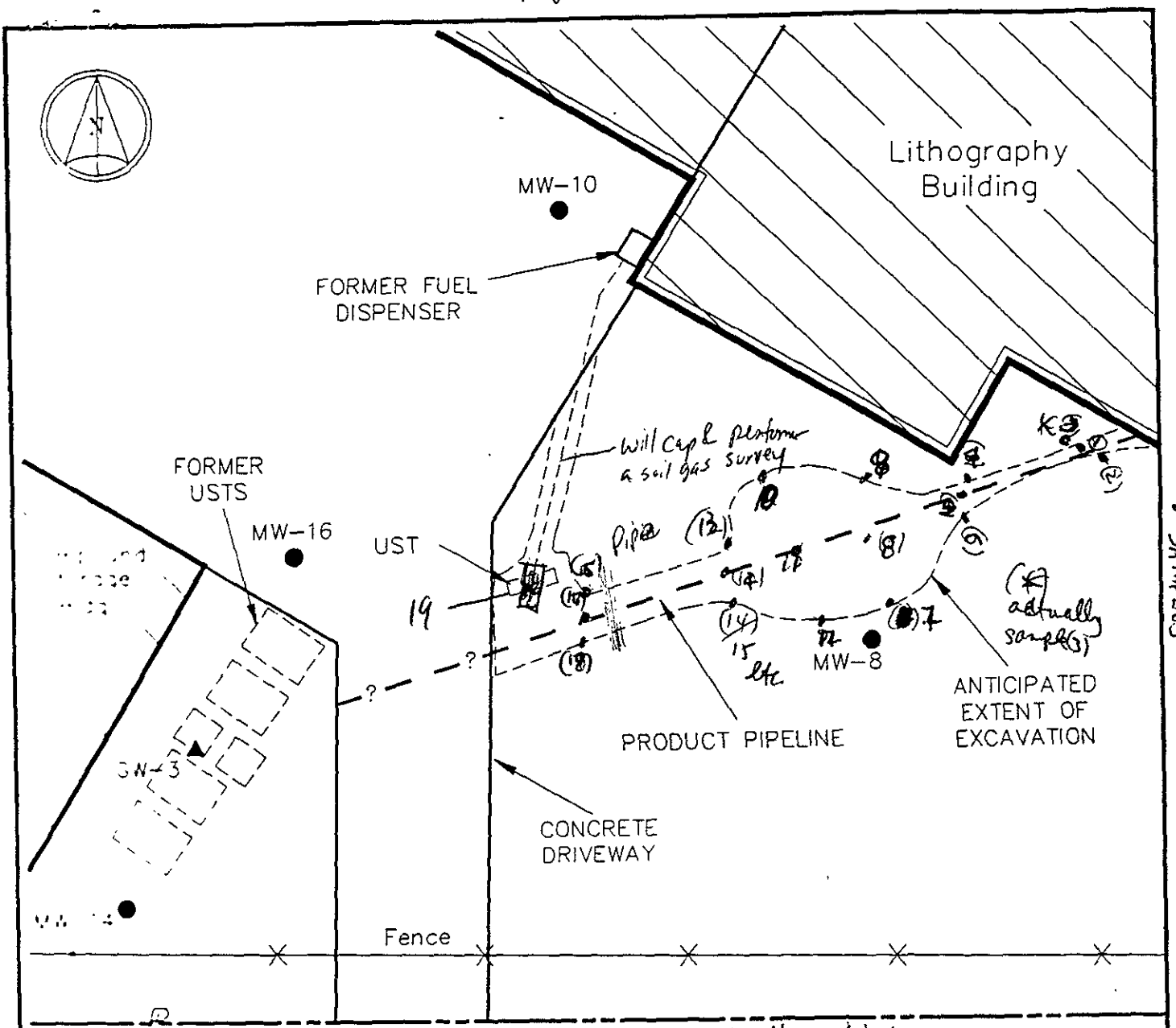
Rev 6/88

Contact: W. Howard

Title: _____ Inspector: B Chan

Signature: X Walter O. Howard Signature: B Chan

10/28/92 Field Notes



(1) piping spl depth ~ 3'
(2) ~~South~~ wall ~ 1½ bgs
(3) north wall ~1½' bgs
(4) piping spl depth ~3'
(5) south wall ~ 1½' bgs
(8) north wall ~2' bgs
(11) piping spl ~3½ bgs
(6) South wall ~ 2' bgs
(9) ~~South~~ ~ 3' bgs - black clay
(10) piping spl ~ 7-8' tan
(12) N wall ~3.5' bgs black
(13) piping spl ~8' bgs - tan
(14) S wall ~5' bgs
(15) N wall ~ 1.5' bgs
(16) center ~3' bgs
(17) S wall ~ 1.5 bgs actually a total of 18 spls
(19) ~8', into native under former tank location

Stockpiled soils on west side of site tracks in prop.

Geology - grey fill (1-2') over black marshy clay (2-9') over ~5' tan silty clay & gravel sand

DUNN GEOSCIENCE CORPORATION
12 Metro Park Road
Albany, NY 12205

PROPOSED SOIL EXCAVATION PLAN

ANC - OAKLAND

PROJECT NO. 02345-01983 | DATE 6/92 | SCALE IN FEET 0 15 30 | FIGURE NO. 1

A8985A4D

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 AMERICAN NATIONAL CAN Today's Date 10/27/92

Site Address 3801 E. 8TH ST

City OAKLAND Zip 9460/ 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)

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'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(l)
__	18. Exemption Request? (Y/N)	25536(b)
__	19. Trade Secret Requested?	25538

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 gndwater
One time soils
3) Daily Vadose
One time soils
Annual tank test
4) Monthly Gndwater
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 tsting
8) Annual Tank Testing
Daily Inventory
9) Other ____

__	7. Precis 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 6/88

Comments:

COMPLAINT OF ODORS OF CLEANUP SITE

WALTER HOWARD OF R. DUNN CORP (518) 458-8931 CONSULTANT IN CHARGE

BARNEY CHAN HAS APPROVED SITE CLEANUP PLAN

HNu MONITORING BEING CONDUCTED IF POSITIVE READINGS ARE FOUND AT SITE BORDER WORK IS STOPPED - NONE DETECTED TO DATE

II, III

Contact: WALTER HOWARD

Title: GEOLOGIST

Signature: Walter O. Howard

Inspector: BRETT JOHNSON

Signature: BJ

B.T.

COMPLAINT FORM

DATE: 10/27/92 TIME: 9:25 am

COMPLAINT RECEIVED BY: T. Spates

ADDRESS OF INCIDENT: High St. (right off of Freeway)
Oakland, CA

NAME OF FACILITY: National Can Co.

CONTACT PERSON:

FACILITY PHONE NUMBER:

SUBJECT OF COMPLAINT: open pit with exposed pipes are eminating a dirty smell.

NAME OF COMPLAINANT: mike PHONE: 707-429-8422

ACTIONS TAKEN AND DATE(S)

10-27-92 COP CASE APPROVED WORKPLAN BY DENNIS BYRNE
B. CHAN TO FOLLOW-UP ON SOIL SAMPLING

Date investigation was completed: 10-27-92

Date complainant contacted: 10-27-92

Name of Specialist: BRITT JOHNSON

Signature: Britt John

Applied Time: 1 hr

mnc/61890/1

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 9, 1992

Fire Chief Jerry Bluford
Oakland Fire Prevention
421 14th St.
Oakland CA 94612

Re: Removal of Closed In-Place Underground Tank at American National Can, 3801 E. 8th St., Oakland CA 94601

Dear Chief Bluford:

This letter is to acknowledge that an Underground Tank Removal Plan from our office will not be required under the following conditions:

1. The tank has been properly inerted ie it contains no free product or has any detectable LEL readings.
2. That the removal and disposal of the tank and any associated piping is done by a certified contractor and a licensed hazardous waste hauler.
3. Proper sampling in accordance with the "Tri-Regional Board Guidelines" is adhered to.
4. Our office has a site specific Health and Safety plan for the excavation and removal activities.

Please note that if the tank is not properly closed, an Underground Tank Closure Plan must be submitted for our office's approval prior to the removal.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: E. Alusow, Dunn Corp, 12 Metro Park Rd., Albany, New York, 12205
Ms. J. Peters, American National Can, 8770 W. Bryn Mawr Ave. Chicago, IL 60631
D. Watts, Riedel Environmental, 4138 Lakeside Dr., Richmond 94806
E. Howell, files

AmNaCan-ust

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

September 22, 1992
STID # 1453

Ms. Judith Peters
American National Can Company
8770 W. Bryn Mawr Ave.
Chicago, IL 60631

Re: Evaluation of Ground Water Remedial Plan, American National Can Company, 3801 E. 8th St., Oakland CA 94601

Dear Ms. Peters:

Please be informed that Mr. Dennis Byrne is no longer employed at this office and that the oversight of the remediation at this site has been transferred to the undersigned Hazardous Materials Specialist. Mr. Byrne has written a summary of the areas of concern at this site and I have spoken with Edward Alusow and Mr. Robert Weston of this office to further familiarize myself with this case. It appears that Areas 2,3 and 4 are those areas of most concern. It is acknowledged that the contamination in area 3 is either mostly or entirely due to the neighboring site, Ecotek. This area has been given the least priority among the three areas mentioned although the contamination in this area may be the most significant and may have the most long-term environmental impact.

Our office has received and reviewed the August, 1992 Draft of the Ground Water Remedial Plan for this site as provided by Mr. Alusow of Dunn Corporation. In theory, our office agrees with the proposed approach however, we have the following concerns that must be addressed prior to granting approval:

1. In order to determine the appropriateness of this ground water extraction system proposed for Areas 2 and 4 you are requested to provide a map showing the isoconcentration lines for all petroleum hydrocarbons contaminants in soil and ground water in these areas.

2. A pump test was performed on TW-1 and a pump test is proposed for GW-3. Please explain why a pump test isn't being performed on GW-6, the other existing well being converted to a product recovery well.
According to the Oct 91 pump test on TW-1, the yield (i.e.) was estimated at only 0.2 gpm. There is also concern that GW-3 may not have a high sustainable yield (i.e.). What remedial alternative will be done if this is the case?

3. The problem of a non-sustainable pump rate may also occur on the perched water recovery system proposed for the trench in Area 4. Again, what is the your proposed alternative if this proves to be the case? In regards to abandonement of this collection trench, please be aware you will be required to determine the extent of soil contamination in this area. This was a concern of Mr. Eddy So, the Regional Water Quality Control Board (RWQCB) contact. At that time you will be requested to submit a soil sampling plan for ~~our offices~~ review by both agencies.

4. The plan for the removal of the pipeline to the 500 gallon UST and the tank itself, if it is found to still exist, has been approved by Mr. Dennis Byrne of this office. You are reminded that you should notify this office at least two working days in advance prior to removal/sampling activities to schedule the witnessing of said events. It has been agreed that a new underground tank closure report will not be required if the tank is uncovered, however all other appropriate removal activities must be performed ie proper notification to the Oakland Fire Department for inspection and notification of the BAAQMD (Air Board), proper removal and disposal of tank and piping by a certified contractor, proper sampling of soil/ground water and analysis of samples by a State certified laboratory in accordance with the Tri-Regional Board guidelines.

5. In the "System Performance Monitoring" section of the work plan, it states that all such samples will be monitored for BTEX, TPH as gasoline and organic lead prior to discharge to the sanitary sewer. It is also appropriate to monitor for TPH as diesel and possibly any other dissolved metals which have appeared in any of the previous monitoring events at level exceeding EBMUD's discharge concentrations.

6. Please provide a site specific Health and Safety Plan for the mentioned activities. At a minimum this plan should include the name of the health and safety officer, the identification of health and safety hazards, the use of any monitoring instruments, specific personal protective equipment or procedures to be used by workers, a spill containment and emergency/contingency plan, documentation that all site workers have received the appropriate OSHA approved training per 29 CFR 1910.120 and a page for employees to sign acknowleging that they have read and will comply with the site H&S plan.

7. Prior to the operation of the proposed extraction system you must verify the existence of an approved Waste Discharge Permit from the East Bay Municipal Utility District (EBMUD). You should also contact the appropriate Air Board to determine if any permit will be required for this treatment system.

Mr. Alusow had additional questions regarding requirement which I would like to comment on now.

Double-walled piping for the treatment system is not required by our office. Some type of secondary containment is recommended, though, to avoid any surface contamination. The specific cut sheets for the actual equipment to be used on this system will be required prior to operation.

You are also requested to inform our office on your status in regards to Area 3. Although no work other than monitoring of wells has been done, please state if any temporary remediation will be ~~done~~ performed to impede ~~the~~ any offsite migration of petroleum contamination ~~from offsite~~.

Please provide a written comment to above items so as to facilitate the initiation of the ground water remedial plan.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: M. Thomson, Alameda County District Attorney Office
E. So, RWQCB
E. Alusow, Dunn Corporation, 12 Metro Park Rd., Albany, New York 12205
E. Howell, files

WP-AMCan

SID 1453

Date: 18 August 1992
To: Barney Chan
From: Dennis Byrne
Subject: American Can, 3810 E. 8th St. Oakland, 94601

This is a complex site involving a variety of environmental contamination problems associated with different parts of the facility. This was once a can manufacturing facility. All aspects of the can manufacturing process took place here including painting the can exterior. As a consequence a number of different solvents and chemicals have been used here. The facility is no longer used for manufacturing. American Can still owns the property, but leases it out for warehouse use.

Cynthia had this case originally. Somehow the thing got to me via Rob Weston. Fortunately, Dunn Corporation, Am. Can's consultant, is good and does not require close supervision.

The site has been divided into sections, each of which faces a different sort of environmental problem (see map in Dunn reports).

Area A Dec 90 Area I

One underground storage tank was removed from this area. Sufficient soil contamination was measured to require a ground water investigation. Quarterly monitoring continues, though no significant ground water contamination has been found. MW-12

Area B (Area II) GW plan

A large heating oil tank remains in this area. Dunn argues that its removal will pose an unreasonable risk to the integrity of the nearby building. But, Am. Can doesn't seem to pursue the close in place process. They can't seem to make up their mind about whether they want to salvage this building or just knock it down. I never gave them any grief over this issue as they have installed wells in the vicinity which show contamination. Floating product has been detected, yet Dunn argues that extraction is not feasible due to the limited pumping rate possible. There is an adequate array of wells within this area and the contaminant plume does not appear to be moving. (1986)

Area C III

This is another pocket of contamination. There are a number of wells present and no pending plan to extract the plume.

Complicating this portion of the property is the fact that it borders the abandoned Ecoteck facility. Ecotek was an oil recycling operation that went belly-up at some remote period in the past. That's the good news. The bad news is that the site was abandoned with its tanks full of crap. So over the years the Ecotek crap has slowly seeped, sloshed and oozed into the Area C portion of Am. Can's facility.

III

Am. Can was not only unlucky enough to have Ecotek as a neighbor, but they even managed to be located down gradient of the place. The Area C contamination in no small measure is the legacy of this geographical misfortune. Area C assessments indicate that a plume of PCBs are migrating through from Ecotek. Dunn is studying the idea of trying to encapsulate the plume. The limitation to this strategy is the fact that unless the primary source of the PCBs is addressed, the encapsulation will constitute only a stop-gap measure at best.

Am. Can would love for us to put the whammy on Ecotek prior to their committing to the encapsulation. The prospect of this happening seems very remote. All the RP's that have been identified with Ecotek are nobodies with no assets. Barring the discovery of an as yet unknown rich guy, a timely addressing of the Ecotek disaster would require the expenditure of state funds. The TSCP people are aware of the problem but to date have displayed no enthusiasm for the project. I sympathize with Am. Can on this one. They are in a real no-win situation. I have been willing to let them slide on deciding how long they can put off the ultimate decision of swallowing the bitter pill this plume presents.

Area D Area IV Gw pla

This is the portion of property where Dunn is taking active remedial action. There is a small underground gas tank located near the building and other localized HC contamination pockets. I approved Dunn's proposal to excavate soils from this area and close the tank (I was willing to let them rely on the old permit associated with the closure of the tank in Area A, but I cautioned them to verify this with you when the time comes.) Because of the proximity of a gas line, Dunn may decide to close this tank in place rather than pull it. I informed them of the process to follow if they opt for this route. They will decide which measure to pursue as the excavation progresses.

Eddy So has one bone of contention with Dunn's proposal for this area. Borings detected a perched aquifer of HC contaminated water just below the ground surface. Dunn wants to drain this aquifer, but Eddy wants them to also excavate any HC contaminated soil associated with the aquifer. Dunn's objection to this requirement is based on the aquifer's location. The affected soil underlies the entrance to the building and to excavate it would disrupt the

ongoing use of the property. I suggested a compromise to Dunn, drain the aquifer, flush it with clean water and then analyze that water for any HC contamination. If no contamination results I felt Dunn would have a good argument for claiming that whatever soil residual contamination remains poses no potential detriment to ground water quality. It makes sense to me and Dunn seemed to like the idea, but so far nobody's gotten Eddy's blessing on the idea.

Regardless of how the soil excavation and tank closure actions proceed, ground water monitoring will continue in this area for the foreseeable future.

Area E Area V

This area was used for steam cleaning. HC contamination was found to be associated with surface stained areas and ground water monitoring wells were installed and sampled quarterly. Nothing was ever detected in the water. I gave Dunn an OK to exclude these wells from further quarterly sampling, but the data keeps showing up.

July 15, 1993
StID # 1453

American National Can Company (ANCC)
3810 E 8th St.
Oakland CA 94601

Site summary supplement to the August 18, 1992 site summary written by Dennis Byrne.

This memo should be used to supplement the information provided in the three page summary written previously by Dennis Byrne. It will provide additional information which has occurred since the August 18,1992 date and other observations and recommendations which may be necessary to either complete the investigation or estimate potential risk for each of the five areas of concern. You will note that Dennis called these areas A-E while they later were called areas 1-5.

It should be noted that our office has had "limited" oversight in regards to the investigation and remediation of this site. That is, much of the investigation has been done proactively and reports have followed for our office's comment. Certain activities were provided work plans for our office's approval. These activities included the modification of sampling requirements for a number of wells, the remediation investigation in Areas 2 and 4 and their position in regards to Area 3, the Ecotek Lube area. One can look at this site as a composite of at least the five areas mentioned. With the eventual demolition of the rest of the buildings, additional environmental problems may be uncovered.

Area 1:

In the north corner of the site a gasoline UST was removed and monitoring well, MW-12 was installed downgradient to the tank. The specifics of the removal were never given in the form of a tank closure report. Reportedly, four quarters of monitoring was performed and this area may be eligible for closure.

Area 2:

This area is on the northwest side of the site where a heating oil tank is closed in place. Unfortunately, the closure has not followed the requirements of Title 23 and is likely the source of continuing high diesel contamination in water and free product.

American National Can
StID #1453
3810 E 8th St.
Site Summary

Monitoring wells MW15, TW-1, MW13 and GW6 were installed around this tank. Free product was found in GW-6 after installation. This product was found to contain 15% diesel and 40% kerosine. Physical barriers prohibit the removal of the tank and recent pump data indicates that groundwater extraction would not be appropriate due to limited recharge in monitoring well GW-6. We should request a report detailing the pump test performed on GW-6, as these results were reported only verbally. Residual soil contamination as well as the groundwater diesel contamination still exists at this location, however, the downgradient well (approximately 175'away), MW21, has not shown any diesel contamination thus far. This tank should be verified that it cannot be closed in place by a professional engineer. With the eventual demolition of the entire site, this tank should be eventually removed unless it can be shown that the soil and groundwater beneath the tank has been totally characterized.

Area 3:

This is the area of most concern which neighbors the Ecotek Lube site. Twelve to thirteen monitoring wells exist in this area. The highest concentration of contaminants would likely occur in the free product found in GW-1. This material was analyzed and found to contain 4160 ppm PCBs, 6.2% diesel and 26% kerosene. The groundwater contamination in the water sample from GW-1 contained 540 ppb benzene, 950 ppb toluene, 150 ppb ethylbenzene and 130 ppb 1,4-dichlorobenzene plus 8.9 ppm 2,4-dimethylphenol. The soils taken from well installations detected the BNAs napthalene at 2.5 ppm and 2-methylnapthalene at 3.8 ppm. The PCB A1260 was found at 2.8 ppm. The April 92 request for change in monitoring frequency called for the monitoring of the wells closest to the ANC building, not the wells on the immediate border of Ecotek Lube and ANC. However, free product bailing of these border wells is occurring on a monthly basis. Perhaps the free product from these wells should be analyzed and compared with the initial free product results. The most current levels of PCBs in the monitoring wells in Area 3 found 9.7 ppb in MW-19 and 670 ppm diesel. It will be necessary to both characterize the Ecotek Lube site and prevent further off-site migration onto the ANC site. All technologies should be considered.

Area 4:

This area is the site of the removal of a number of solvent tanks (1986) and a gasoline tank(1992). Further soil excavation was performed after the removal of the 500 gallon gasoline tank and the pipeline extending from the former solvent tank area.

American National Can
Stid # 1453
3810 E. 8th St.
Site Summary

Extensive soil excation was performed surrounding the former piping run. High levels of toluene was formerly found in shallow soil samples from MW-8. The groundwater in GW-3 found elevated concentrations of toluene, 20ppm, and ethylbenzene at 4.6 ppm. PCBs have not been found in the wells within Area 4. The work plan for further investigation of Areas 2 and 4 called for the installation of groundwater extraction system in monitoring wells GW-6 in Area 2 and GW-3 in area 4. The concentration of toluene was used to monitor the effectiveness of the groundwater extraction pump test. Levels of toluene starting at 18 mg/l were reduced to 1600 ppb over a period of 3 days and the removal of 6570 gallons of water. Dunn Corporation continued to monitor GW-3 over a period of three to four week intervals and found thatthe concentrations of xylenes went back up to 11 mg/l and the concentrations of ethylbenzene went from 650 ppb to 3900 ppm. TPHg went from 5.3 to 39 mg/l, however, no benzene or toluene was found during or after the pump test. It appears that residual TPHg, xylenes and ethylbenzene remain in soils around GW-3 which contribute to the high levels of these compounds impacting the groundwater. MW-14 the apparent downgradient well relative to GW-3 has surprisingly not been detecting TPHg or BTEX. If no further excavation is proposed in Area 4, the groundwater monitoring within this area should be revised.

Dunn maintains that because the area of GW-3 is paved, and that clay exists around this area laterally and that the groundwater in this area is degraded from the Ecotek Lube site, no further work should be required.

Area 5:

The surficial spillage of petroleum hydrocarbons in this area appears to have been monitored appropriately with MW-11 by analyzing for TPH g and d and Dennis Byrne approved the discontinuance of monitoring. I don't know the exact number of sampling events which was performed.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

July 20, 1992

Walter Howard
Dunn Corporation
12 Metro Park Road
Albany, N.Y. 12205

Subject: American Can Facility, 3810 E. 8th St. Oakland, CA.

Dear Mr. Howard:

Thank you for the Remedial Plan for Area 4 of the facility listed above. I have reviewed this plan and approval is granted for its implementation subject to the following conditions:

1) The residual contamination levels that you intend to allow in backfill soil exceed those of the San Francisco Bay Regional Water Quality Control Board. You propose backfilling soil with a residual level of Benzene contamination of 5 ppm, up to 20 ppm of BTEX components and as much as 250 ppm of Total Petroleum Hydrocarbon. Benzene and Toluene are specifically listed chemicals which cannot be legally discharged in the State of California under the authority of the Toxic Enforcement and Safe Drinking Water Act ("Prop 65"). In addition, policies of the Regional Board prohibit the backfill of soil with a residual petroleum hydrocarbon contamination greater than 10 ppm.

   To ensure compliance with local standards your proposed actions will have to be modified. Any excavated soil with a residual contamination level greater than 10 ppm of hydrocarbon contamination or any detectable level of Benzene or Toluene will require off-site disposal or on-site treatment to reduce the residual contamination levels to below these values prior to backfilling.

2) Prior to removing the underground storage tank that you anticipate encountering, Barney Chan, a Hazardous Materials Specialist with this office, should be contacted to determine if an Underground Storage Tank Closure Plan must be submitted.

Please direct further inquiries to Barney Chan, Hazardous Materials Specialist at (510) 271-4320.

Sincerely,

Dennis J. Byrne
Senior Hazardous Materials Specialist

cc: Lester Feldman, SFBRWQCB

File

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

28 April 1992

Ms. Judith Peters
American National Can Company
8770 W. Bryn Mawr Avenue
Chicago, IL 60631

Subject: ANCC facility at 3801 8th Street, Oakland, California.

Dear Ms. Peters:

Thank you for the amended monitoring plan prepared by Dunn Corporation for the above-listed site. I have reviewed this plan dated 27 April 1992, and approval is granted for its implementation with the following modification. Well MW-9 should be incorporated into the monitoring scheme for Area 4 with samples being analyzed for BTEX and TPH-g. In addition, the report dated February 1992 appears to present an anomaly concerning the lead content of the ground water measured in wells MW-9 and MW-14. Unfiltered samples from these wells detected no lead contamination whereas filtered samples measured lead contamination in the parts per million range. A lead analysis should be incorporated into the sampling regime for these wells. These modifications should be included into the sample collection scheduled for the week of May 4th. Whether the modified sampling routine described in this letter will extend into subsequent sampling episodes will depend on the data obtained.

The contents of this letter have been discussed with Walter Howard of Dunn Corporation. If you have any questions concerning this matter, please feel free to contact me at (510) 271-4320.

Sincerely,

Dennis J. Byrne
Senior Hazardous Materials Specialist

cc: Rich Hiatt, SFBRWQCB
Rafat Shahid, Assistant Director, Alameda County Department of Environmental Health
Walter Howard, Dunn Corp.

DUNN CORPORATION

Engineers, Geologists, Environmental Scientists
12 Metro Park Road
Albany, New York 12205
Tel 518/458-1313
Fax 518/458-2472

April 27, 1992

Mr. Dennis Byrne
Department of Environmental Health
80 Swan Way, Room 200
Oakland, California 94621

Dear Mr. Byrne:

Subject: American National Can Company
3801 East 8th Street, Oakland, California

As part of the subsurface investigation completed at the subject site over the past year, Dunn Corporation (DUNN) has completed four quarterly rounds of ground water sampling and performed additional investigations in areas of concern. With the pending submission (May, 1992) of a Subsurface Investigation Summary Report (SISR) to the Department of Environmental Health (DEH), DUNN has completed its investigation of the 5 areas of concern at the site.

At this time, DUNN is proposing to implement a site ground water monitoring plan for the upcoming year beginning May 1, 1992. Based on the information gathered over the past year, DUNN has developed a ground water monitoring plan which will provide for effective monitoring of the extent and concentration of impacted ground water, while providing some warranted economic relief to the American National Can Company (ANCC). The following sections provide details of DUNN's proposed revised plan for each of the 5 areas of the site.

AREA 1

There are presently 2 wells (MW-12 and GW-5) in Area 1. The four rounds of monitoring of well MW-12 and two rounds of well GW-5 revealed no detectable concentrations of TPH as gasoline (TPHg) or BTEX. Considering the analytical results to date, DUNN proposes to discontinue all ground water monitoring in Area 1.

AREA 2

There are presently six (6) wells in Area 2 (GW-6, MW-13, MW-15, TW-1, MW-17 and MW-21). Wells GW-6 and TW-1 are located directly downgradient from the abandoned heating oil UST. Well MW-21, recently installed inside the plant, is located further downgradient from the UST.

Based on the ground water flow regime in Area 2, and on the analytical results from the past year of monitoring, DUNN proposes to sample wells TW-1 and MW-21 as part of the revised quarterly ground water monitoring plan. The samples collected from these wells will be analyzed for TPH as diesel (TPHd) by EPA Method 3510 and field filtered metals, nickel and zinc.

AREA 3

There are presently 12 wells in Area 3. The extensive sampling performed in Area 3 over the last year has shown that ground water, particularly between ANCC Building No. 12 and the ANCC/EKOTEK Lube property line is contaminated with petroleum hydrocarbons, chlorinated organic compounds and PCBs.

Ground water contour maps prepared from each quarterly round of monitoring reveal the presence of a ground water mound at the ANCC/Ekotek Lube property line. Ground water flows onto the ANCC's property in a radial pattern from the mound with flow to the northeast, north, west and southwest. The mound lies within the regional ground water system that has a flow direction to the south-southeast; consequently, a ground water trough exists beneath the ANCC's property. The axis of this trough represents low groundwater elevations between the two opposing flow directions. The trough also represents the boundary along which ground water flowing from the mound is redirected by the regional component of ground water flow around the perimeter of the mound. Ground water flows parallel with, but not across, the trough and therefore the trough represents a hydraulic barrier. As a result, the axis of the trough represents the furthest extent onto ANCC property of the flow of contaminants identified near the ANCC/Ekotek Lube property. This ground water flow regime is most clearly depicted on the two most recently submitted ground water contour maps (Plates 6 and 9).

Ground water elevation and analytical data collected over the past year indicate that the axis of the trough extends in an arcuate pattern from near well MW-1, beneath Building #12, to near well GW-2. Ground water along the axis near MW-1 flows in a northeast direction around the northern perimeter of the mound while ground water along the axis near well GW-2 flows in a southerly direction around the western perimeter of the mound. Therefore, these wells represent the furthest on-site downgradient monitoring points for ground water flowing from the mound, before it flows off-site.

Based upon analytical results and ground water flow patterns obtained during the past year, DUNN is proposing to revise the Area 3 monitoring plan. In order to effectively monitor contaminated ground water flowing westward into the trough from the ANCC/EKOTEK Lube property line, DUNN proposes to sample wells MW-1, MW-19 and GW-2. DUNN proposes to analyze these samples for volatile organic compounds (VOCs), semi-VOCs, PCBs, and TPH as diesel. In order to monitor ground water flowing into the trough from the west/northwest, DUNN proposes to sample wells MW-6, MW-18, MW-20 and MW-7. DUNN proposes to analyze these samples for VOCs, TPH as diesel and PCBs. The sampling of wells, GW-2 and MW-1 will provide a means for effective monitoring of ground water flowing off-site.

AREA 4

These are presently six wells (MW-8, MW-9, MW-10, MW-14, MW-16 and GW-3) in Area 4. Elevated concentrations of toluene, ethylbenzene, xylenes and TPH as gasoline are present in ground water collected near well GW-3. Based on the analytical data reported for other wells in Area 4, specifically MW-14, MW-16, and MW-9, the impacted ground water near GW-3 is limited in lateral extent.

Ground water contour maps prepared from the last two rounds of monitoring (October, 1991 and February, 1992) indicate that well MW-14 is directly downgradient from GW-3. DUNN, therefore, proposes to sample MW-14 as part of this revised ground water

monitoring plan. This well will be sampled for VOCs and TPHg. In addition, well MW-8 will again be sampled to monitor for potential migration of Area 3 contaminants. This well will be sampled for VOCs, TPH as diesel and PCBs.

AREA 5

There are presently 2 wells in Area 5 (MW-11 and GW-4). DUNN discontinued the sampling of well GW-4, with DEH approval, following the second round of sampling (July, 1991). Analytical results from MW-11 have revealed consistently low ($\leq$5 ppb) estimated concentrations of tetrachloroethene. The February, 1992, quarterly round of sampling also revealed an estimated concentration of 1,2-dichlorobenzene. The reported concentrations of tetrachloroethene are equal to or less than both the USEPA and the California Department of Health Care Services maximum contaminant levels for drinking water, and the recently reported concentration of 1,2-dichlorobenzene is much below the USEPA MCL. As a result, ground water impact in this are of the site appears to be negligible. Therefore, DUNN proposes to discontinue all future sampling in Area 5.

SUMMARY

The attached Table 1 provides a summary of DUNN's proposed revised ground water monitoring plan as described in the previous sections. DUNN intends to continue water level and product thickness monitoring of all wells at the site on a quarterly basis. DUNN will submit ground water contour maps with the results of quarterly sampling to the DEH. If approved, DUNN intends to initiate this plan by conducting the first round of monitoring during the week of May 4, 1992. Three subsequent rounds of monitoring will be completed on a quarterly basis over the remainder of the year.

DUNN would appreciate your timely review of this plan so that the plan can be implemented during the upcoming round of sampling. Should you have any questions regarding this proposed plan, please contact me at (518) 458-8931.

Sincerely,

DUNN CORPORATION

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

EWA:WOH/ce

attachment

cc: J. Moran, ANCC
J. Peters, ANCC
E. So, RWQCB

STATE OF CALIFORNIA - ENVIRONMENTAL PROTECTION AGENCY PETE WILSON, Governor

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
700 HEINZ AVENUE, SUITE 200
BERKELEY, CALIFORNIA 94710
(510) 540-3729

92 FEB 18 AM 9:25

February 13, 1992

CERTIFIED MAIL

Mr. Leroy Smith
American National Can Company
3801 East Eighth Street
Oakland, California 94604

EPA ID NO. CAD 009162116

Dear Mr. Smith:

REPORT OF VIOLATION AND SCHEDULE OF COMPLIANCE

On December 11, 1991, the Department of Toxic Substances Control (DTSC) conducted an inspection of American National Can Company (ANCC), Oakland, California, EPA ID. NO. CAD 009162116. As a result of that inspection, the following violations of hazardous waste statutes and regulations were found.

I. Violations

1. Title 22, California Code of Regulations (Cal. Code Regs.), Section 66262.41(a).

   On or about December 11, 1991, American National Can Company (ANCC), violated Cal. Code Regs., Section 66262.41(a) in that ANCC failed to submit a Biennial Report to the Department by March 1, 1990 (April 15, 1990 was the extended date).

   According to manifests for the 1989 year (collected from the Hazardous Waste Information System and confirmed during the inspection), the facility generated greater than 5 tons of hazardous waste during the 1989 calendar year (the largest shipment was 15.17 tons of contaminated soil that was removed on 2/6/89).

2. Title 22, Cal. Code Regs., Section 66262.42(b).

   On or about December 11, 1991, ANCC, violated Cal. Code Regs., Section 66262.42(b) in that ANCC failed to submit to the Department an exception report that explained the efforts made by ANCC to locate the hazardous waste identified on manifests numbered 88043475 and 88043466.

3. Title 22, Cal. Code Regs., Section 66262.23(a)(1).

On or about December 11, 1991, ANCC, violated Cal. Code Regs., Section 66262.23(a)(1) in that ANCC failed to complete the generator section of uniform hazardous waste manifest numbered: 91632431, 90133982, 88043475, 88043466, 90134079, 90134072.

The following manifests did not have the state generator ID number filled out in section B: 91632431 90133982, 90134079, 90134072.

Manifests numbered 88043475 and 88043466 identified the generator of the waste as being American National Can in San Leandro, CA. The EPA ID# indicated on the manifest is the EPA ID # for the Oakland facility.

Manifest numbered 88043475, and 88043466 did not have the state transporter ID number filled out.

Manifest number AR-485904 did not have the state waste code identified on it. The only statement made in the Section I was the PCB identification.

4. Title 22, Cal. Code Regs., Section 66268.7(a)(2).

On or about December 11, 1991, ANCC, violated Cal. Code Regs., Section 66268.7(a)(2) in that ANCC failed to include with a shipment of hazardous waste (F003 and F005) a notification and certification that the waste meets the treatment standards and can be disposed of without further treatment.

Manifest number 91632431 did not have notification and certification for the waste shipped off-site.

5. Title 22, Cal. Code Regs., Section 66262.34 (a)(3) and 66265.54(c).

On or about December 11, 1991, ANCC, violated Cal. Code Regs. Section 66262.34 (a)(3) and 66265.54(c) in that ANCC failed to revise the contingency plan after the plant shifted from a manufacturing mode to a shipping/receiving mode.

6. Health and Safety Code (H&SC), Section 25201(a).

On or about December 11, 1991, ANCC, violated H&SC, Section 25201(a) in that ANCC accumulated hazardous waste on-site for greater than 90 days days without a permit or and extension from the Department.

Two full and one partially full 55-gallon containers holding hazardous waste used oil and oily water were located at the forklift area. The last time a shipment of the used oil occurred was in the summer or the fall of 1990.

7. Title 22, Cal. Code Regs., Section 66262.34(f).

On or about December 11, 1991, ANCC violated Cal. Code Regs., Section 66262.34(f) in that ANCC failed to label containers holding hazardous waste with the words "hazardous waste", the date of accumulation, the composition and physical state of the waste, a statement or statements that call attention to the hazardous properties of the waste and the name and address of the waste.

Three 55-gallon containers holding hazardous waste used oil and oily water located at the forklift repair area were initially not labeled.

8. Title 22, Cal. Code Regs., Section 66262.34(a)(3) and 66265.16(a)(1).

On or about December 11, 1991, ANCC violated Cal. Code Regs., Section 66262.34(a)(3) and 66265.16(a)(1) in that ANCC failed to successfully train personnel currently handling hazardous waste at the Oakland facility. Additionally, there was no written description of the type and amount of both introductory and continuing training that will be given to each person filling a position.

9. Title 22, Cal. Code Regs., Section 66262.34(a)(3) and 66265.16(c).

On or about December 11, 1991, ANCC violated Cal. Code Regs., Section 66262.34(a)(3) and 66265.16(c) in that ANCC personnel failed to take part in an annual review of the initial training.

10. Health and Safety Code (H&SC), Section 25250.8.

On or about December 11, 1991, ANCC violated H&SC, Section 25250.8 in that ANCC failed to complete a manifest or a bill of lading for used oil which was shipped off-site for disposal.

There was no bill of lading or hazardous waste manifest that shows who or when the used oil located at the forklift maintenance area was shipped off-site for disposal.

II. Schedule for Compliance

A. Immediately upon receipt of this Report of Violation, ANCC shall begin:

1. Completing the entire generator required portion of the uniform hazardous waste manifest prior to offering hazardous waste for shipment;

2. Complying with all the terms of the land disposal restrictions of Title 22, Cal. Code Regs., Section 66268.7(a)(2);

3. Properly labeling containers holding hazardous waste with all required information as specified in Title 22, Cal. Code Regs. Section 66262.34.

4. Manifesting all shipments of used oil in accordance with the statutory requirements of Health and Safety Code, Section 25250.8.

B. Within 30 days of receipt of this Report of Violation, ANCC shall:

1. Submit a Biennial Report, EPA Form 8700-13A/B, 5-80, to the Department that provides information on generator activities during the 1989 calendar year;

2. Submit an exception report to the Department that explains the effort made by ANCC to locate the hazardous waste identified on manifests numbered 88043475 and 88043466;

3. Submit a revised Contingency Plan developed in accordance with Title 22, Cal. Code Regs., Chapter 15

Article 4 to the Department for review that includes, but is not limited to: names of the current emergency coordinators, their phone numbers and addresses; the location, physical description, and capabilities of all the emergency equipment located at the facility; and an evacuation plan;

4. Submit a certification signed by a corporate officer stating that all areas identified as initial areas of accumulation as defined in Health and Safety Code, Section 25123.3(d) and in Title 22, Cal. Code Regs., Section 66262.34(e) and all areas identified as 90-day accumulation areas as defined in Title 22, Cal. Code Regs., Section 66262.34 shall be managed to ensure compliance with all hazardous waste labeling and container management requirements;

5. Submit for Department review and approval, a Training Plan developed in accordance with Title 22, Cal. Code Regs., Section 66265.16(a)(1-3). The Plan shall address all elements of generator requirements to ensure that employees of ANCC performing duties involved in the area of managing hazardous wastes are performing those duties in accordance with regulatory standards. Within thirty (30) days of receipt of Department approval of the Training Plan, ANCC shall implement the Plan providing training for all employees performing duties involved in the management of hazardous waste. ANCC shall provide to the Department the name of the individual implementing the Plan and his/her qualifications in the area of hazardous waste management;

6. Submit to the Department a certification signed by a corporate officer verifying that ANCC is maintaining training records on-site in accordance with Title 22, Cal. Code Regs., Section 66265.16(d). Within fifteen (15) days of completion of all training courses required in paragraph II.B.5., ANCC shall submit to the Department a certification signed by a corporate officer and by the individual employed to provide the training in accordance with the approved plan, verifying that ANCC has implemented the approved Training Plan.

Enclosed you will find a self Certification Statement. An authorized representative of American National Can Company must sign and submit the certification to the Department within 30 days of receipt of this Report of Violation.

The issuance of this Report of Violation does not preclude the Department from taking administrative, civil or criminal action as a result of the violations noted herein.

The Department may schedule a reinspection of ANCC to verify compliance.

If you have any questions regarding this Report of Violation, please contact David Wampler at (510) 540-3861.

Sincerely,

David Wampler
Hazardous Materials Specialist
Surveillance & Enforcement Branch
Region 2

Patricia Barni
Unit Chief
Surveillance & Enforcement Branch
Region 2

Enclosure
Cert. Mail No. P 659 118 661

cc: See next page

cc: Mr. Larry Matz
Surveillance and Enforcement Branch
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Mr. Mike Shepard
Toxics Legal Office
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Mr. Edgar Howell
Alameda County Department of Environmental Health
Division of Hazardous Waste Management
80 Swan Way, Room 200
Oakland, California 94621

Mr. Joe Moran
Staff Counsel
American National Can
8770 W. Bryn Mawr
Chicago, Illinois 60631

Ms. Judy Peters
Environmental Engineer
American National Can
8770 W. Bryn Mawr
Chicago, Illinois 60631

American National Can Company
3801 East Eighth Street
Oakland, CA 94604

SELF CERTIFICATION STATEMENT

I certify under penalty of law that I have examined the Report of Violation dated February 13, 1992 and I am familiar with the information prepared in response to the Schedule of Compliance. Based on my inquiry of those individuals immediately responsible for obtaining and preparing the information, I believe the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

_____ _____

Authorized Representative Date

STATE OF CALIFORNIA
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
REGION 2
700 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

Mr. Edgard Howell
Alameda County Dept. of Environmental Health
Division of Hazardous Waste Managemetn
80 Swan Way, Room 200
Oakland, CA 94621

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
80 Swan Way, Rm. 210
Oakland, CA 94621
(415) 271-4300

January 21, 1992

Mr. Edward Alusow
Senior Project Manager
Dunn Corporation
12 Metro Park Road
Albany, New York 12205

Dear Mr. Alusow:

The Alameda County Environmental Health Department, Hazardous Materials Division, has received your proposal dated January 20, 1992, for a modified groundwater monitoring program at the American National Can Company (ANCC) facility in Oakland. The proposal calls for the elimination of the collection and analyses of groundwater samples for metals during the fourth round of quarterly monitoring at the facility scheduled to begin the week of January 27, 1992.

The modified groundwater monitoring program is acceptable to this Division with the following change. The metal analysis will be performed for Area 2, MW-13, MW-15 and TW-1 for zinc concentrations, both total and filtered. Collection and analyses for metals at MW-15 and TW-1 have only been carried out during the October 1991 sampling event. The next round of sampling will complete four quarters of monitoring at MW-13 but only the second sampling of MW-15 and TW-1. It is anticipated that the design of the upcoming remediation workplan will incorporate the data gathered from these samples to address the concentrations of zinc in excess of the Maximum Concentration Level (MCL) found for the last three quarters in Area 2, MW-13.

If you have any questions regarding this letter, please contact me at (510) 271-4320.

Sincerely,

Robert Weston
Hazardous Materials Specialist

RW:RW

c: Eddy So
Judith Peters

DUNN CORPORATION
Engineers, Geologists, Environmental Scientists
12 Metro Park Road
Albany, New York 12205
Tel: 518/458-1313
Fax: 518/458-2472

January 20, 1992

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To Mr. Robert Weston	From Ed Alusow
Co.	Co.
Dept.	Phone #
Fax # 415 464-1380	Fax #

Mr. Robert Weston
Hazardous Materials Specialist
Alameda County Health Agency
80 Swan Way, room 200
Oakland, California 94621

Dear Mr. Weston:

Subject: ANC Oakland Facility, Groundwater Monitoring Program

Dunn Corporation (DUNN) will be completing a fourth round of quarterly groundwater monitoring at the subject site during the week of January 27, 1992. With this letter, DUNN is proposing a modification to it's groundwater analytical program.

During previous quarterly sampling rounds conducted in July and October, 1991, both total matrix and field filtered groundwater samples were analyzed for various inorganic metals (arsenic, barium, chromium, nickel, zinc, lead and silver). The results of these analyses indicate that these inorganic compounds are not significantly impacting groundwater at the site. The concentrations of arsenic, barium, chromium, lead and silver reported for all samples previously analyzed were either not detected or were detected at concentrations below the primary or secondary National Interim Drinking Water Regulations as promulgated under the Safe Drinking Water Act (SDWA).

Zinc concentrations of all samples analyzed except those from well MW-13, also were either not detected or were detected at levels below SDWA standards. The zinc concentrations reported for Area 2 well MW-13 in July and October, 1991, were 7,410 ug/L and 6,880 ug/L, respectively. These concentrations are only slightly above the SDWA zinc standard of 5000 ug/L. Additionally, zinc levels reported in the October 1991 analyses for new Area 2 wells MW-15 (21.8 ug/L) and TW-1 (26.9 ug/L) are much below the SDWA regulatory standards. The low levels in these two wells, directly downgradient from well MW-13, indicate that the zinc concentrations in well MW-13 are a local phenomenon.

Since nickel is not regulated in drinking water, DUNN compared the analytical results for nickel to the California Department of Health Care Services Applied Action Levels (AALs). The concentrations of nickel reported for all samples previously analyzed were either not detected, or were detected at concentrations below the corresponding AAL of 400 ug/L (Human Biological Receptor Category) for nickel.

The cost of analyzing total matrix and field filtered samples for the seven inorganic metals outlined above is approximately $4,000.00 for each round of sampling. This does not include the additional costs associated with labor and materials which are necessary to collect and filter these samples. Considering that these parameters do not appear to be impacting groundwater at the site, DUNN feels that their continued analysis is not warranted. DUNN, therefore, is proposing to modify the groundwater monitoring plan

by eliminating the collection and analyses of groundwater samples for metals. The remainder of the analytical programs will be continued in accordance with DUNN's letter dated October 11, 1991.

Your cooperation is solicited in reviewing this proposal in a timely manner since we would like to implement this proposed modified plan during the January round of quarterly sampling. Please call me with questions.

Very truly yours,

DUNN CORPORATION

Edward W. Alusow

Edward W. Alusow
Senior Project Manager

EWA:me

cc: J. Peters
J. Moran
E. So

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

EBM File

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

September 22, 1992
STID # 1453

Ms. Judith Peters
American National Can Company
8770 W. Bryn Mawr Ave.
Chicago, IL 60631

Re: Evaluation of Ground Water Remedial Plan, American National Can Company, 3801 E. 8th St., Oakland CA 94601

Dear Ms. Peters:

Please be informed that Mr. Dennis Byrne is no longer employed at this office and that the oversight of the remediation at this site has been transferred to the undersigned Hazardous Materials Specialist. Mr. Byrne has written a summary of the areas of concern at this site and I have spoken with Edward Alusow and Mr. Robert Weston of this office to further familiarize myself with this case. It appears that Areas 2,3 and 4 are those areas of most concern. It is acknowledged that the contamination in area 3 is either mostly or entirely due to the neighboring site, Ecotek. This area has been given the least priority among the three areas mentioned although the contamination in this area may be the most significant and may have the most long-term environmental impact.

Our office has received and reviewed the August, 1992 Draft of the Ground Water Remedial Plan for this site as provided by Mr. Alusow of Dunn Corporation. In theory our office agrees with the proposed approach however we have the following concerns that must be addressed prior to granting approval:

1. In order to determine the appropriateness of this ground water extraction system proposed for Areas 2 and 4 you are requested to provide a map showing the isoconcentration lines for all petroleum hydrocarbons contaminants in soil and ground water in these areas.

2. A pump test was performed on TW-1 and a pump test is proposed for GW-3. Please explain why a pump test isn't being performed on GW-6, the other existing well being converted to a product recovery well.
According to the Oct 91 pump test on TW-1, the yield was estimated at only 0.2 gpm. There is also concern that GW-3 may not have a high sustainable yield. What remedial alternative will be done if this is the case?

3. The problem of a non-sustainable pump rate may also occur on the perched water recovery system proposed for the trench in Area 4. Again, what is the your proposed alternative if this proves to be the case? In regards to abandonment of this collection trench, please be aware you will be required to determine the extent of soil contamination in this area. This was a concern of Mr. Eddy So, the Regional Water Quality Control Board (RWQCB) contact. At that time you will be requested to submit a soil sampling plan for our review.

4. The plan for the removal of the pipeline to the 500 gallon UST and the tank itself, if it is found to still exist, has been approved by Mr. Dennis Byrne of this office. You are reminded that you should notify this office at least two working days in advance prior to removal/sampling activities to schedule the witnessing of said events. It has been agreed that a new underground tank closure report will not be required if the tank is uncovered, however all other appropriate removal activities must be performed ie proper notification to the Oakland Fire Department for inspection and notification of the BAAQMD (Air Board), proper removal and disposal of tank and piping by a certified contractor, proper sampling of soil/ground water and analysis of samples by a State certified laboratory in accordance with the Tri-Regional Board guidelines.

5. In the "System Performance Monitoring" section of the work plan, it states that all such samples will be monitored for BTEX, TPH as gasoline and organic lead prior to discharge to the sanitary sewer. It is also appropriate to monitor for TPH as diesel and possibly any other dissolved metals which have appeared in any of the previous monitoring events at level exceeding EBMUD's discharge concentrations.

6. Please provide a site specific Health and Safety Plan for the mentioned activities. At a minimum this plan should include the name of the health and safety officer, the identification of health and safety hazards, the use of any monitoring instruments, specific personal protective equipment or procedures to be used by workers, a spill containment and emergency/contingency plan, documentation that all site workers have received the appropriate OSHA approved training per 29 CFR 1910.120 and a page for employees to sign acknowleging that they have read and will comply with the site H&S plan.

7. Prior to the operation of the proposed extraction system you must verify the existence of an approved Waste Discharge Permit from the East Bay Municipal Utility District (EBMUD). You should also contact the appropriate Air Board to determine if any permit will be required for this treatment system.

Mr. Alusow had additional questions regarding requirement which I would like to comment on now.

Double-walled piping for the treatment system is not required by our office. Some type of secondary containment is recommended, though, to avoid any surface contamination. The specific cut sheets for the actual equipment to be used on this system will be required prior to operation.

You are also requested to inform our office on your status in regards to Area 3. Although no work other than monitoring of wells has been done, please state if any temporary remediation will be performed to impede the offsite migration of petroleum contamination onto this site.

Please provide a written comment to above items so as to facilitate the initiation of the ground water remedial plan.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: M. Thomson, Alameda County District Attorney Office
E. So, RWQCB
E. Alusow, Dunn Corporation, 12 Metro Park Rd., Albany, New York 12205
E. Howell, files

WP-AMCan

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Director

Telephone Number: (415)

October 18, 1991

ATTN: Ms. Judith Peters
American National Can Company
5770 W. Bryn Mawr Avenue
Chicago, IL 60631

Re: Project # 3018A
at 3801 E. 8th. Street, Oakland 94601

Dear Ms. Peters:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of $670.00, payable to Alameda County.

Please write the project number and site address on your check.

We must receive this deposit before we perform any further work on this project. At the completion of this project, any unused monies will be refunded to you or your designee.

If you have any questions, regarding this matter please contact Robert Weston at (510) 271-4320.

Sincerely,

Edgar B. Howell III, Chief
Hazardous Materials Division

EH:rw

c: files

DUNN GEOSCIENCE CORPORATION

12 METRO PARK ROAD
ALBANY, NY 12205
(518) 458-1313
FAX (518) 458-2472

91 AUG -7 AM 8:46

August 6, 1991

FEDERAL EXPRESS

Ms. Cynthia Chapman
Hazardous Materials Specialist
Department of Environmental Health
Alameda County Health Agency
80 Swan Way, Rm. 200
Oakland, California 94621

Dear Ms. Chapman:

Subject: ANCC Oakland Facility Report

Enclosed are two copies of the final report of the initial subsurface investigation that DUNN has conducted at the American National Can Company's Oakland manufacturing plant. Please pass one copy to Lester Feldman, San Francisco Regional Water Quality Control Board.

If you have any questions, please call me.

Very truly yours,

DUNN GEOSCIENCE CORPORATION

Edward W. Alusow

Edward W. Alusow
Senior Environmental Scientist
Project Manager
Calif. Reg. Geologist No. 4282

EWA/me

cc: L. Feldman, RWQCB
J. Peters, ANCC
J. Moran, ANCC

enc.

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)

April 17, 1991

Ms. Judy Peters
American National Can Company
Mail Suite 04D
8770 West Bryn Mawr Avenue
Chicago, IL 60631-3504

Dear Ms. Peters:

On January 1, 1991, I visited the American National Can Company facility at 3801 East 8th Street, Oakland. The purpose of the visit was to walk through the facility to observe where past manufacturing practices had occurred, and to view the permitted hazardous waste storage areas. This facility currently warehouses empty cans.

There were two areas that were permitted by the DHS to store hazardous waste for longer than 90 days: the Drum Storage Area, and the Solder Dross Storage Area. Both of these areas had concrete floors, and the Drum Storage Area has a concrete berm around the perimeter. No hazardous waste is stored in these areas.

The concrete flooring in both locations was clean, and no staining was evident that would locate any past storage of leaking drums. As part of an environmental assessment, ANCC has done some soil sampling near the drum storage area. Analyses indicate no contamination resulting from the types of liquid waste stored in this area. There are no on-site treatment or disposal areas at this site.

I would recommend that the Hazardous Waste Storage Facility permit be closed out by the DHS, after you've submitted your closure plan to the Region 2 office.

If you have any questions feel free to call me at 415/271-4320.

Sincerely,

Cynthia Chapman

Cynthia Chapman
Hazardous Materials Specialist

CC

DUNN GEOSCIENCE CORPORATION

12 METRO PARK ROAD
ALBANY, NY 12205
(518) 458-1313
FAX (518) 458-2472

January 14, 1991

Ms. Cynthia Chapman
Hazardous Materials Specialist
Department of Environmental Health
Alameda County Health Agency
80 Swan Way, Rm. 200
Oakland, California 94621

Dear Ms. Chapman:

Subject: American National Can Company Oakland Facility

Thank you for taking the time to meet with Judy Peters of American National Can Company (ANCC) and me last week. I certainly hope that you have shaken your cold.

We would like to express our appreciation to you for your timely and expedient review of the Workplan submitted to you on January 7, 1991, by ANCC. This letter will serve to confirm your approval of that Workplan. As you suggested, we are adding a boring location in the area of the steam cleaner. Based upon visual observation of retrieved soil samples and the results of field screening, this boring may be converted to a groundwater monitoring well. If so, the same construction standards and methods presented in the Workplan will be followed.

Once again, it was a pleasure meeting with you and we look forward to working with you in the future. Please do not hesitate to call me with questions or comments.

Very truly yours,

DUNN GEOSCIENCE CORPORATION

Edward W. Alusow

Edward W. Alusow
Senior Environmental Consultant

EWA/me

cc: J. Peters
L. Feldman, RWQCB

American National Can

January 3, 1991

Ms. Cynthia Chapman
Hazardous Materials Specialist
Alameda County Health Care Services
Department of Environmental Health
Hazardous Materials Program
80 Swan Way, Room 200
Oakland, CA 94621

RE: WORK PLAN FOR
AMERICAN NATIONAL CAN COMPANY
OAKLAND FACILITY

Dear Ms. Chapman:

As requested in your letters dated December 5, 1990 and December 7, 1990 enclosed is the Work Plan for the sampling and investigation at our Oakland facility. This report was prepared by Dunn Geoscience and is duly signed by a California Registered Geologist.

We trust this satisfies your request.

If you have any questions or require additional information, please contact R. Rivetna, Director of Environmental Engineering, at (312) 399-3392.

Yours very truly,

AMERICAN NATIONAL CAN COMPANY

N. Chernikoff
Sr. Vice President
Research & Engineering

RMR/j/JXP011
attachments

cc: Mr. Lester Feldman
Regional Water Quality Control Board,
San Francisco Bay Region
1800 Harrison Street, Suite 700
Oakland, CA 94612

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

EMERGENCY ☐ YES ☒ NO — HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? ☐ YES ☐ NO

REPORT DATE: 1 M 2 M 0 D 4 D 9 Y 0 Y — CASE #:

FOR LOCAL AGENCY USE ONLY
I HEREBY CERTIFY THAT I AM A DESIGNATED GOVERNMENT EMPLOYEE AND THAT I HAVE REPORTED THIS INFORMATION TO LOCAL OFFICIALS PURSUANT TO SECTION 25180.7 OF THE HEALTH AND SAFTY CODE.
SIGNED: Cynthia Chapman DATE: 12/27/90

REPORTED BY

NAME OF INDIVIDUAL FILING REPORT: ROHINTON M. RIVETNA
JUDITH PETERS
PHONE: (312) 399-3162
SIGNATURE: [signature] 12-14-90

REPRESENTING ☒ OWNER/OPERATOR ☐ REGIONAL BOARD ☐ LOCAL AGENCY ☐ OTHER _____
COMPANY OR AGENCY NAME: AMERICAN NATIONAL CAN COMPANY

ADDRESS (STREET): 8770 W. BRYN MAWR AVE. — CITY: CHICAGO — STATE: ILLINOIS — ZIP: 60631

RESPONSIBLE PARTY

NAME: AMERICAN NATIONAL CAN CO. ☐ UNKNOWN
CONTACT PERSON: JUDITH PETERS
PHONE: (312) 399-3162

ADDRESS (STREET): 8770 W. BRYN MAWR AVE. — CITY: CHICAGO — STATE: ILLINOIS — ZIP: 60631

SITE LOCATION

FACILITY NAME (IF APPLICABLE): AMERICAN NATIONAL CAN CO.
OPERATOR:
PHONE: (415) 536-2410

ADDRESS (STREET): 3801 EAST 8th ST. — CITY: OAKLAND — COUNTY: ALAMEDA — ZIP: 94601

CROSS STREET: EAST SIDE OF 37th AVENUE

IMPLEMENTING AGENCIES

LOCAL AGENCY / AGENCY NAME: Alameda County
CONTACT PERSON: Cynthia Chapman
PHONE: (415) 271-4320

REGIONAL BOARD: San Francisco Bay Regional
CONTACT PERSON: Lester Feldman
PHONE: (415) 464 1256

SUBSTANCES INVOLVED

(1) NAME: gasoline — QUANTITY LOST (GALLONS): ☒ UNKNOWN
(2) NAME: _____ — QUANTITY LOST (GALLONS): _____ ☐ UNKNOWN

DISCOVERY/ABATEMENT

DATE DISCOVERED: 1 M 2 M 0 D 4 D 9 Y 0 Y
HOW DISCOVERED: ☐ INVENTORY CONTROL ☐ SUBSURFACE MONITORING ☐ NUISANCE CONDITIONS ☐ TANK TEST ☒ TANK REMOVAL ☐ OTHER _____

DATE DISCHARGE BEGAN: M M D D Y Y ☒ UNKNOWN

HAS DISCHARGE BEEN STOPPED? ☒ YES ☐ NO IF YES, DATE: M M D D Y Y

METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY)
☒ REMOVE CONTENTS ☐ REPLACE TANK ☐ CLOSE TANK
☐ REPAIR TANK ☐ REPAIR PIPING ☐ CHANGE PROCEDURE
☐ OTHER removed tank

SOURCE/CAUSE

SOURCE OF DISCHARGE: ☒ TANK LEAK ☐ UNKNOWN ☐ PIPING LEAK ☐ OTHER

CAUSE(S): ☐ OVERFILL ☐ RUPTURE/FAILURE ☐ SPILL ☒ CORROSION ☐ UNKNOWN ☐ OTHER _____

CASE TYPE

CHECK ONE ONLY
☒ UNDETERMINED ☐ SOIL ONLY ☐ GROUNDWATER ☐ DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)

CURRENT STATUS

CHECK ONE ONLY
☐ NO ACTION TAKEN ☐ PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED ☒ POLLUTION CHARACTERIZATION
☐ LEAK BEING CONFIRMED ☐ PRELIMINARY SITE ASSESSMENT UNDERWAY ☐ POST CLEANUP MONITORING IN PROGRESS
☐ REMEDIATION PLAN ☐ CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY) ☐ CLEANUP UNDERWAY

REMEDIAL ACTION

CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS)
☒ EXCAVATE & DISPOSE (ED) ☐ REMOVE FREE PRODUCT (FP) ☐ ENHANCED BIO DEGRADATION (IT)
☐ CAP SITE (CD) ☐ EXCAVATE & TREAT (ET) ☐ PUMP & TREAT GROUNDWATER (GT) ☐ REPLACE SUPPLY (RS)
☐ CONTAINMENT BARRIER (CB) ☐ NO ACTION REQUIRED (NA) ☐ TREATMENT AT HOOKUP (HU) ☐ VENT SOIL (VS)
☐ VACUUM EXTRACT (VE) ☐ OTHER (OT) _____

COMMENTS

HSC 05 (11/89)

American National Can

90 DEC 24 PM 12:09

December 17, 1990

Ms. Cynthia Chapman
Alameda County Health Care Services Agency
Division of Hazardous Materials
Department of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

RE: UNDERGROUND STORAGE TANK
UNAUTHORIZED RELEASE (LEAK)/
CONTAMINATION SITE REPORT
AMERICAN NATIONAL CAN COMPANY
OAKLAND FACILITY

Dear Ms. Chapman:

Attached please find the Underground Storage Tank Unauthorized Release (Leak)/ Contamination Site Report form as requested in your letter dated December 7, 1990.

We have requested that our consultant, Dunn Geoscience, prepare the ground water investigation report outlined in your letter.

The required $600.00 review fee will be submitted in the next few weeks.

If you have any questions or require additional information, please do not hesitate to contact the undersigned at (312) 399-3392.

Yours very truly,

AMERICAN NATIONAL CAN COMPANY

R. M. Rivetna

R. M. Rivetna
Director
Environmental Engineering

RMR/j/JXP009
attachment

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)

December 7, 1990

Area 1 Tank Removal
C Chapman

Ms. Judith Peters
American National Can Company
8770 W. Bryn Mawr Ave.
Chicago, IL 60631

Dear Ms. Peters:

This letter is to follow up on the tank removal activities that occurred on December 4, 1990, at the American National Can facility at 3801 East 8th Street in Oakland, California.

The tank had several small holes in the bottom of the tank, apparently due to corrosion. This condition is considered to be a tank failure, based on investigation guidelines set by the California State Water Resources Control Board. Because of this tank failure, a soil and groundwater investigation is required to determine the lateral and vertical extent of the contamination. I informed Mr. Joseph Besca, of Dunn Geoscience, of these requirements and explained that American National Can will need to install monitoring wells as part of the groundwater investigation.

Two soil samples were taken from the excavation: One from approximately two feet below where the bottom of the tank was, and another one was taken two feet below this sample after excavating the bottom of the pit to remove as much contaminated soil as possible. Contamination was confirmed by laboratory analyses, which Mr. Besca phoned in to me on December 6, 1990. He indicated that both samples contained hydrocarbon contamination above 100 ppm (a case prioritization value), and proposed excavating down to near the water table, take a confirmation soil sample, and backfill with clean fill. I gave Mr. Besca my approval for those activities.

Mr. Besca has a copy of the "Underground Storage Tank Unauthorized Release/Contamination Site Report." I requested him to complete this and return it to our office within 14 days.

Our office will be the lead agency overseeing the soil and groundwater investigation at this site. The San Francisco Bay Regional Water Quality Control Board (RWQCB) has delegated the handling of this case to our Division. We will be in contact with the RWQCB in order to provide you with guidance concerning the RWQCB's investigation requirements. However, please be aware that you are responsible for diligent actions to protect the waters of the

State. All work must be performed according to the "Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tanks, 10 August, 1990," and the "Leaking Underground Fuel Tank Manual," from the California State Water Resources Control Board. I gave Mr. Besca the phone number to order these guidance documents. You are required to complete a workplan that provides information on how the subsurface investigation will proceed. Please submit this workplan within 45 days of the date of this letter. A format for the workplan and items to address is outlined below.

I. INTRODUCTION

A. Statement of Scope of Work

B. Site location

C. Background

D. Site History

Provide a brief description of the historic site use and ownership information, type of business and associated activities that take place at the site, types and location of any hazardous materials used on site, and a description of any known hazardous materials spills, leaks, or accidents. Provide a history of the use of the underground tank, its contents, and include the date of installation.

II. SITE DESCRIPTION

A. Provide a map which shows streets, site buildings, underground tank locations, subsurface conduits and utilities, on-site and nearby wells, and nearby streams or water bodies.

B. Provide a description of the hydrogeologic setting of the site and surrounding area. Include a description of any subsurface work previously done at the site.

III. PLAN FOR DETERMINING EXTENT OF SOIL CONTAMINATION ON SITE

A. Describe how the extent of soil contamination associated with the former underground tanks will be determined.

B. Describe the sampling methods and procedures to be used. If soil samples are to be collected for contamination delineation, consult the RWQCB guidelines for soil sampling

protocols. During drilling of all boreholes and monitoring wells, undisturbed soil samples are to be collected at a minimum of every five feet in the unsaturated zone and at any changes in lithology for logging and analytical purposes. Borings and wells are to be permitted through Alameda County Flood Control and Water Conservation District, Zone 7. Their number is 415/484-2600. Borings and wells are to be logged from undisturbed soil samples. Logs shall include observed soil odors; blow counts shall be expressed in blows per 6 inches of drive.

If a soil gas survey is planned, the location of survey points must be identified along with the analytical methods and techniques to be used. A quality assurance plan for field analyses must be submitted.

C. Soil samples are to be analyzed by a California State Certified Laboratory for the appropriate constituents.

IV. DETERMINATION OF GROUNDWATER QUALITY

A. A minimum of three monitoring wells must be installed to determine the groundwater gradient. If the verified down-gradient location has been established, then complete gradient data must be submitted and one monitoring well will be required in the down-gradient direction.

B. Monitoring wells shall be designed and constructed to be consistent with the RWQCB guidelines and to permit entrance of any free product into the wells. Filter pack and slot sizes for all wells should be based on particle analysis from each stratigraphic unit in at least one boring on the site and on the types of groundwater contaminants present. The well screen must be situated to intercept any floating product from both the highest and lowest ground water levels. All wells shall be surveyed to mean sea level to an established benchmark to 0.01 foot.

C. Monitoring wells must be sampled for dissolved and floating constituents. Any free product is to be measured with an optical probe or by another method shown to have equivalent accuracy.

D. A groundwater gradient map shall be developed for every water level data set. If the gradient fluctuates, water level measurements must continue to be made monthly until a gradient pattern is established. Fluctuations in groundwater levels due to tidal action must also be documented.

E. Sample monitoring wells monthly for three consecutive months. Free product thicknesses and water levels shall be measured in all wells for each sampling event before any purging or sampling activities are begun. After three consecutive months of sampling, all monitoring wells must be sampled at least quarterly for one year. Groundwater levels and quality must be monitored quarterly for a minimum of one year, even if no contamination is identified.

F. Groundwater samples are to be analyzed by a California State Certified Laboratory for the appropriate constituents.

V. INTERPRETATION OF HYDROGEOLOGIC DATA

A. Water level contour maps showing groundwater gradient direction and free and dissolved product plume definition maps of each contaminant constituent should be prepared routinely and submitted with other sampling results.

B. The hydrogeologic characteristics of the aquifer must be described. An estimate of vertical transmissivity, based on a laboratory permeability test or a pump test, is required for any unit identified as a clay. Identification of the clay should be verified by particle analysis (ASTM D-422).

C. The cross sections, groundwater gradients (horizontal and vertical) should be interpreted to explain pollution migration patterns.

VI. DETERMINATION OF THE TYPES OF BENEFICIAL USES OF THE GROUNDWATER

The State has defined all San Francisco Bay Area water as having beneficial uses; however, the types of beneficial uses vary and must be determined in order to establish appropriate cleanup levels. Beneficial uses include drinking water, irrigation, groundwater recharge, wild life habitat, contact and non-contact recreation, fish migration, etc. A drinking-water beneficial use "aquifer" is defined as an aquifer yielding water of less than 3,000 units of total dissolved solids and yielding water at a rate of at least 200 gallons per day.

VII. SITE SAFETY PLAN

VIII. REPORTING

A. A technical report must be submitted, **within 30 days of completion of the investigation**, which presents and interprets the information generated during the initial subsurface site investigation. At a minimum, the report must include the following items: Site history information, boring and well construction logs, records of field observations and data, chain-of-custody forms, water level data, water level contour map showing groundwater gradient direction, contaminant plume maps, tabulations of soil and groundwater contaminant concentrations, status of soil contamination characterization, description of any remedial work performed, laboratory-originated analytical results for all soil and groundwater samples analyzed, copies of TSDF-to-Generator manifests for any hazardous wastes hauled off-site, a description on where non-hazardous contaminated soils went, and any recommendations for additional investigative or remedial work.

B. All reports and proposals must be signed by a California-Certified Engineering Geologist, California-Registered Geologist or a California-Registered Civil Engineer. A statement of qualifications should be included in all reports. Borehole and monitoring well installation and logging, and impact assessments will require the signature of such a professional.

C. The technical report must be submitted with a cover letter from American National Can Company and received in this office by the established due date. The letter must be signed by a principal executive officer or by an authorized representative of the company.

Any stockpiled soil associated with tank removal activities or investigation activities must be sampled to determine the proper disposition of the soil. The number of samples collected from the stockpile(s) must be adequate to characterize the soil for the appropriate soil handling method.

All proposals, reports and analytical results pertaining to this investigation and remediation must be sent to our office and to the RWQCB. You should be aware that this Division is working in conjunction with the RWQCB and that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Any extensions of agreed upon time deadlines must be confirmed in writing by either this Division or the RWQCB.

We will require a deposit/refund for reviewing the work plan and for oversight of your case. Please remit $600.00, payable to Alameda County.

Should you have any questions concerning the contents of this letter or the status of this case, please feel free to contact me at 415/271-4320.

Sincerely,

Cynthia Chapman

Cynthia Chapman
Hazardous Materials Specialist

c: Mr. Lester Feldman, RWQCB
Mr. Joseph Besca, Dunn Geoscience
Mr. Richard K. Baker, American National Can Company

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)

April 17, 1991

Ms. Judy Peters
American National Can Company
Mail Suite 04D
8770 West Bryn Mawr Avenue
Chicago, IL 60631-3504

Dear Ms. Peters:

On January 1, 1991, I visited the American National Can Company facility at 3801 East 8th Street, Oakland. The purpose of the visit was to walk through the facility to observe where past manufacturing practices had occurred, and to view the permitted hazardous waste storage areas. This facility currently warehouses empty cans.

There were two areas that were permitted by the DHS to store hazardous waste for longer than 90 days: the Drum Storage Area, and the Solder Dross Storage Area. Both of these areas had concrete floors, and the Drum Storage Area has a concrete berm around the perimeter. No hazardous waste is stored in these areas.

The concrete flooring in both locations was clean, and no staining was evident that would locate any past storage of leaking drums. As part of an environmental assessment, ANCC has done some soil sampling near the drum storage area. Analyses indicate no contamination resulting from the types of liquid waste stored in this area. There are no on-site treatment or disposal areas at this site.

I would recommend that the Hazardous Waste Storage Facility permit be closed out by the DHS, after you've submitted your closure plan to the Region 2 office.

If you have any questions feel free to call me at 415/271-4320.

Sincerely,

Cynthia Chapman

Cynthia Chapman
Hazardous Materials Specialist

SA

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)

April 17, 1991

Ms. Judy Peters
American National Can Company
Mail Suite 04D
8770 West Bryn Mawr Avenue
Chicago, IL 60631-3504

Dear Ms. Peters:

On April 17, 1991, I talked with Ms. Sheila Alfonso in the Permitting Section of the Region 2 California Department of Health Services (DHS) regarding what steps ANCC needs to take to be removed from the list of Treatment, Storage, and Disposal facilities. As I understand from the conversation, ANCC needs to resubmit the closure plan to DHS, with a letter certifying that the facility was closed in accordance with the closure plan. I recommend including a report of the actual closure activities, since the 1988 document only describes the proposed activities.

This closure report should be sent to:

Mike James
California Department of Health Services, Permitting Section
700 Heinz Avenue
Berkeley, CA 94710

If you have any other permit/closure questions, you can contact either Mr. James or Ms. Alfonso at 415/540-3734.

I explained to Ms. Alfonso that all the permitted activities had ceased, and that during my visit at the facility, the storage areas appeared clean and not to require any further action. I am enclosing a letter to you discussing the "findings" of my site visit regarding the storage areas. I am also returning your closure plan for the permitted storage facilities at the ANCC plant at 3801 East 8th Street, Oakland.

If you have any questions feel free to call me at 415/271-4320.

Sincerely,

Cynthia Chapman

Cynthia Chapman
Hazardous Materials Specialist

CB

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

UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

1. **Business Name** AMERICAN NATIONAL CAN COMPANY

   Business Owner AMERICAN NATIONAL CAN COMPANY

2. **Site Address** 3801 East 8th Street

   City Oakland **Zip** 94601 **Phone** (415) 536-2410

3. **Mailing Address** 8770 W. Bryn Mawr Avenue Attn. Judith Peters

   City Chicago, Illinois **Zip** 60631 **Phone** (312) 399-3162

4. **Land Owner** AMERICAN NATIONAL CAN COMPANY

   Address 8770 W. Bryn Mawr Avenue **City, State** Chicago, Ill. **Zip** 60631

5. **EPA I.D. No.** CAD 009162116

6. **Contractor** Universal Engineering, Inc.

   Address 610 Industrial Way

   City Benicia, CA 94510 **Phone** 707/746-6699

   License Type Gen. Engr. "A" **ID#** 527659

7. **Consultant** DUNN GEOSCIENCE CORPORATION

   Address 12 Metro Park Road

   City Albany, New York 12205 **Phone** (518) 458-1313

8. Contact Person for Investigation

Name JOSEPH S. BESCA John Blust Title Senior Remediation Specialist

Phone (518) 458-8931

9. Total No. of Tanks at facility 1

10. Have permit applications for all tanks been submitted to this office? Yes [X] No [ ]

11. State Registered Hazardous Waste Transporters/Facilities

a) Product/Waste Tranporter

Name Universal Engineering, Inc. EPA I.D. No. CAT080013469

Address 610 Industrial Way

City Benicia, State CA Zip 94510

b) Rinsate Transporter (same as above)

Name Universal Engineering, Inc. EPA I.D. No. _____

Address _____

City _____ State _____ Zip _____

c) Tank Transporter (same as above)

Name Universal Engineering, Inc. EPA I.D. No. _____

Address _____

City _____ State _____ Zip _____

d) Tank Disposal Site

Name Erickson, Inc. EPA I.D. No. CAD009466392

Address 255 Parr Blvd.

City Richmond, State CA Zip 94801

e) Contaminated Soil Transporter (same as above)

Name Universal Engineering, Inc. EPA I.D. No. _____

Address _____

City _____ State _____ Zip _____

12. Sample Collector

Name _____

Company Universal Engineering, Inc.

Address 610 Industrial Way

City Benicia State CA Zip 94510 Phone 707/746-6699

13. Sampling Information for each tank or area

Tank or Area		Material sampled	Location & Depth
Capacity	Historic Contents (past 5 years)		
500 Gallons	Gasoline	soil	

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

If yes, describe. _____

15. NFPA methods used for rendering tank inert? Yes [X] No [ ]

If yes, describe. Dry ice will be used to inert tank(20 lbs. for each 1,000 gal capacity of tank)

An explosion proof combustible gas meter shall be used to verify tank inertness.

16. Laboratories

Name Chromalab, Inc.

Address 2239 Omega Road #1

City San Ramon, State CA Zip 94583

State Certification No. 0990131

17. Chemical Methods to be used for Analyzing Samples

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Number
Lead	TPHG mod 5030	6010
TPH	BTEX 8020 or 8240	8015
BTXE	Total lead by AA	8020
Oil & grease 5520 D+F		8240

18. Submit Site Safety Plan

19. Workman's Compensation: Yes [X] No [ ]

Copy of Certificate enclosed? Yes [X] No [ ]

Name of Insurer _____

20. Plot Plan submitted? Yes [X] No [ ] see attached map & city of Oakland

21. Deposit enclosed? Yes [X] No [ ]

22. Please forward to this office the following information within 60 days after receipt of sample results.

a) Chain of Custody Sheets

b) Original Signed Laboratory Reports

c) TSD to Generator copies of wastes shipped and received

d) Attachment A summarizing laboratory results

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 Saftey and Health Administration) requirements concerning personnel and safety.

I will notify the Department of Environmental Health at least two (2) working days (48 hours) after approval of this closure plan in advance to schedule any required inspections. 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.

Signature of Contractor

Name (please type) Richard E. Camacho

Signature Richard E. Camacho

Date 10/29/90

Signature of Site Owner or Operator

Name (please type) Judith G. Peters

Signature Judith G. Peters

Date 11-1-90

TABLE #2
REVISED 10 AUGUST 1990

RECOMMENDED MINIMUM VERIFICATION ANALYSES FOR UNDERGROUND TANK LEAKS

HYDROCARBON LEAK	SOIL ANALYSIS	WATER ANALYSIS
Unknown Fuel	TPH G GCFID(5030) TPH D GCFID(3550) BTX&E 8020 or 8240 or TPH AND BTX&E by 8260 CRYOGENIC FOCUSING	TPH G GCFID(5030) TPH D GCFID(3510) BTX&E 602, 624 or 8260
Leaded Gas	TPH G GCFID(5030) BTX&E 8020 or 8240 or TPH AND BTX&E by 8260 CRYOGENIC FOCUSING TOTAL LEAD AA ---Optional--- TEL DHS-LUFT EDB DHS-AB1803	TPH G GCFID(5030) BTX&E 602, 624 or 8260 TOTAL LEAD AA TEL DHS-LUFT EDB DHS-AB1803
Unleaded Gas	TPH G GCFID(5030) BTX&E 8020 or 8240 or TPH AND BTX&E by 8260 CRYOGENIC FOCUSING	TPH G GCFID(5030) BTX&E 602, 624 or 8260
Diesel	TPH D GCFID(3550) BTX&E 8020 or 8240 or TPH AND BTX&E by 8260 CRYOGENIC FOCUSING	TPH D GCFID(3510) BTX&E 602, 624 or 8260
Jet Fuel	TPH D GCFID(3550) BTX&E 8020 or 8240 or TPH AND BTX&E by 8260 CRYOGENIC FOCUSING	TPH D GCFID(3510) BTX&E 602, 624 or 8260
Kerosene	TPH D GCFID(3550) BTX&E 8020 or 8240 or TPH AND BTX&E by 8260 CRYOGENIC FOCUSING	TPH D GCFID(3510) BTX&E 602, 624 or 8260
Fuel/Heating Oil	TPH D GCFID(3550) BTX&E 8020 or 8240 or TPH AND BTX&E by 8260 CRYOGENIC FOCUSING	TPH D GCFID(3510) BTX&E 602, 624 or 8260
Chlorinated Solvents	CL HC 8010 or 8240 BTX&E 8020 or 8240 or CL HC AND BTX&E 8260	CL HC 601 or 624 BTX&E 602 or 624 or CL HC AND BTX&E 8260
Non Chlorinated Solvents	TPH D GCFID(3550) BTX&E 8020 or 8240 or TPH AND BTX&E 8260	TPH D GCFID(3510) BTX&E 602 or 624 or TPH AND BTX&E 8260
Waste and Used Oil or Unknown (All analyses must be completed and submitted)	TPH G GCFID(5030) TPH D GCFID(3550) or TPH AND BTX&E by 8260 CRYOGENIC FOCUSING O & G 5520 D&F BTX&E 8020 or 8240 CL HC 8010 or 8240 ICAP or AA TO DETECT METALS: Cd, Cr, Pb, Zn, Ni METHOD 8270 FOR SOIL OR WATER TO DETECT: PCB* PCP* PNA CREOSOTE	TPH G GCFID(5030) TPH D GCFID(3510) O & G 5520 C&F BTX&E 602, 624 or 8260 CL HC 601 or 624 PCB* PCP* PNA CREOSOTE

*If found, analyze for dibenzofurans (PCBs) or dioxins (PCP)

- Render First Aid, if necessary. Decontaminate the victim's outer clothing after critical First Aid has been given.

- Obtain paramedic services or ambulance services. Transport the victim to the local hospital for medical care. (This procedure shall be followed even if there is no visible injury).

- Other personnel shall be evacuated to a safe distance until it is determined that it is safe for work to resume. If there is any doubt regarding the condition of the area, further appropriate advice shall be sought.

- At the earliest practical time, the SHSO shall contact the Project Manager and provide details of the incident and any steps that have been taken to prevent its recurrence.

- In the event that there is a possibility that an environmental impact or off-site migration of toxic substance is likely, then immediate notification to the following agencies of the incident shall be implemented.

  - The National Emergency Response Center
  - The CA State Office of Emergency Services
  - The Local Police Department or Sheriff's Department

  (For telephone numbers, see Item 1.0)

- A written report of the incident shall be prepared by the SHSO and the Project Manager within twenty-four (24) hours following the incident and forwarded to the corporate director.

4.0 MEDICAL SCREENING PROCEDURES

The purposes of the medical screening program are as follows:

- To assess the health status of personnel prior to work and to determine their fitness for the anticipated duties.

- To monitor personnel for the evidence of post project adverse health affects.

All employees who will be working at any given remedial action site must undergo a medical evaluation before participating in field work.

A Physician's Statement qualifying the employee's physical ability to work will be available on-site in the possession of the Project Manager for review by the contracting officer's representative or the appropriate regulatory agency as may be required.

5.0 PERSONAL PROTECTIVE APPAREL AND EQUIPMENT

The suggested item specifications and description in this section are included primarily for information purposes only. As stated earlier in this document, the generic nature of the Health and Safety Plan is such that site specific, job specific, and contaminant specific personal protective clothing cannot be presented at this time. However, it should be clearly understood that the appropriate Level of Protection (A - D) will be utilized by all employees while working. Appropriate Levels of Protection, vendors and actual items will be determined by the SHSO and continuously evaluated throughout the course of the project.

5.1 Personal Protection

The SHSO shall insure that ample supplies including, but not limited to, the following items will be available for worker's personal use during any on-site work activity.

- Gloves:
  - Inner: latex, vinyl, and when needed, nitrile will be used.
  - Outer: chemically protective, neoprene, butyl rubber, nitrile gloves
- Protective Clothing:
  - Tyvek coveralls (all sizes)
  - Polylaminated Saranex coveralls
  - Butyl rubber aprons
  - PVC chemically resistant splash suits
- Footwear:
  - Chemical protective butyl rubber boots fitted with steel shanks and steel toe protectors.
  - Safety shoes worn with protective PCV overboots.

- Eye Protection:
  - Safety glasses with side shields
  - Single unit plastic "specs" with shields
  - Goggles
  - Face shield (attached to hard hat)
- Hard Hat
- Hearing Protectors
  - Ear plugs
  - Acoustic ear muffs
- Respiratory Protection
  - Half-mask air purifying respirators equipped with NIOSH/MSHA approved cartridges for protection against organic vapors, mists, pesticides, dusts, and fumes, as conditions dictate. All particulate cartridges shall conform to the current ANSI Standard for HEPA filters.
  - Full-face mask respirators equipped with air-purifying cartridges as described above.
  - Self-contained Breathing Apparatus (SCBA) conforming to the current ANSI Standard with an ample supply of auxiliary air bottles filled with Grade-D breathing air.
  - Supplied air system(s) supplying Class-C, Grade-D air under positive pressure. Air delivery shall not exceed limits as established in 29 CFR, 1910.134.
  - 5-minute escape masks.

5.2 Other Miscellaneous Protective Equipment

If unanticipated conditions are encountered which require additional personal protection, the SHSO shall insure that appropriate additional personal protective apparel and equipment is available and in use prior to continuing field activities under such conditions.

5.3 Disposal of Contaminated Clothing

After daily field work has been completed, outer disposable protective clothing shall be removed and placed in impervious bags. The bagged waste will then be handled as hazardous waste and disposed of accordingly as a part of the site remedial work waste stream.

When laundering is necessary, clothing shall be washed by laundries which accept contaminated clothing. All boots will be decontaminated each day and left on-site until the conclusion of the project field work.

5.4 Safety Equipment

Minimally, the SHSO shall have the following items immediately available on-site:

- o One (1) or more 30 pound ABC fire extinguisher(s)
- o Foam generating fire extinguisher(s)
- o First Aid Kit
- o A supply of clean, potable water
- o A portable eye wash unit conforming to OSHA Standards
- o Soap or waterless hand cleaner and towels
- o Medical oxygen for resuscitation purposes

5.5 Apparel Decontamination Facilities

The SHSO shall establish a safety apparel decontamination station at the work site. At a minimum, soap, rinse water, towels, wash pans, and brushes for scrubbing boots, bib overalls, and other gear as is needed shall be available. All wastes generated during the decontamination process will be contained and properly disposed.

5.6 Personnel Decontamination and Personal Hygiene

Personnel shall be provided with clean and sanitary change room(s) equipped with storage facilities for street clothing and adequately removed from potential sources of contamination. Contaminated individuals should shower at the end of the work shift. These facilities, when provided, will be in compliance with OSHA standards as stipulated in 29 CFR 1910.141.

A rest area in which workers may take rest breaks and noon breaks shall be made available for workers in an area that is free of potential sources of contamination.

5.7 Air Monitoring Equipment

There are no direct reading instruments available that would be suitable for the quantification of all airborne contaminants that might be encountered at all hazardous waste cleanup sites. Therefore, specific detection instrumentation and sampling strategies will be selected for contaminants as they are presented in the pre-work plan prior to the implementation of site mitigation activities.

However, since almost every hazardous waste site potentially would involve chemicals existent in vapor, gaseous or particulate states, all instrumentation and sampling equipment required for environmental and personal monitoring will be provided by the SHSO. Refer to Appendix F for a list of direct reading instrumentation and other sampling equipment that will be made available during the work phases of a project.

Personal air monitoring will be performed to document worker's 8 hr. Time Weighted Average (TWA) exposure to specific volatile organic vapors and inorganic gases. The personnel to be monitored and the number of samples to be collected will be determined by the SHSO after evaluating site conditions and work activities.

The SHSO shall insure that all necessary monitoring equipment is available prior to the start of site work. The SHSO shall also ensure that monitoring instruments are used only by persons who have had prior experience with their use, care, calibration and operation; and who are knowledgeable about their operational limitations.

6.0 FIELD PERSONNEL HEALTH AND SAFETY TRAINING

6.1 General Health and Safety Training

In order to derive the greatest benefit from staff hours devoted to training as required under 29 CFR, 1910.120 (8)(e), Industrial Hygienists, Occupational Health Specialists, and other professionals experienced in the health and safety aspects of hazardous waste management shall provide initial, refresher, and/or review training to the staff as outlined in Appendix B. The following basic areas of worker safety technique will be discussed.

6.1.1 Health and Safety Training

Ref: Superfund Amendments and reauthorization Act (S.A.R.A.) 1986, Title II, Section 126. All Universal Engineering personnel (except clerical staff), have completed a forty (40) hour Health and Safety Training Course within the past year. Refer to Appendix A for an outline of course content. Documentation to employee attendance is available upon request.

6.1.2 Hazardous Waste Truck Driver Training

In accordance with the CA Vehicle Code, (Section 12804.1), all working personnel have successfully completed a forty (40) hour driver training course for hazardous waste truck drivers and/or are currently working on 8-16 hour refresher courses. (See Appendix B). Documentation of employee participation in these course series is also available upon request.

6.1.3 Site Specific Health and Safety Training and Hazardous Substances in the Field

Before beginning work at each specific site, Universal Engineering field-assigned workers will be required to attend a site indoctrination health and safety training session. At the minimum, each member shall receive the following training as described by 29 CFR, 1910.120(8)(E):

- Personal introduction to the Project Manager and the Site Health and Safety Officer.
- Indoctrination about potential site safety hazards present on-site and those routes of exposure to be particularly cautious.
- Types and concentrations of hazardous substances known or suspected by the SHSO to be present at the site.
- Special work practices required for the specific site.
- Engineering controls and special equipment present on-site.

- Overview of personal protective equipment required for remedial activities on-site.

- Medical surveillance requirements on-site.

- Physiological and behavioral signs of acute toxicity that must be recognized as early as possible.

- Confined Space requirements (if needed).

- Decontamination procedures to be practiced.

- In the case of sampling:

    o Review of sampling techniques that will be employed on the site during the project.

    o Special protective equipment that must be utilized during sampling (if any).

6.1.4 Role of the Site Health and Safety Officer

Clarification of the authority of the SHSO on-site and the responsibility of each employee to follow directions and orders of the SHSO will be emphasized.

6.1.5 Respiratory Protection

The following aspects of respiratory protective equipment will be discussed.

- Selection
- Donning
- Fit
- Qualitative fit testing
- Use
- Maintenance during usages

6.1.6 Use of Safety Apparel and Equipment

The following areas of personal protection will be discussed.

- Personal protective equipment use
- Limitations of clothing and equipment
- Personal hygiene and habits
- Decontamination procedures (clothing, equipment, etc.)
- Disposal of contaminated clothing

6.1.7 Emergency Procedures and Services

Refer to page 1 of this document for telephone numbers and individual contacts.

7.0 SITE OPERATIONS

7.1 General Safety

Site operations shall be conducted in a safe manner consistent with the procedures contained in Universal Engineering's Safety Procedures Manual. The number of personnel working on site shall be restricted to a minimum and will represent only those needed to perform the required work.

7.2 Forbidden Practices

Universal Engineering's policies pertaining to forbidden practices as they are cited in the New Employee Handbook shall be strictly enforced at all times during hazardous waste site operations.

7.3 Control of Possible Contamination During Remedial Activities and Sampling

The Project Manager shall review and approve all procedures governing work activities at the site. These procedures shall be used to ensure that neither property nor unsuspecting persons are contaminated by any aspect of project activities. Therefore, any procedure affecting health and safety shall be reviewed and approved by Universal Engineering's staff. Procedures and/or procedural changes should address the following items as appropriate.

- Preventions of surface contamination by subsurface material and vice versa.
- Minimization of dust generation resulting from the operation of graders and other heavy construction equipment. (It should be noted that water spraying of overburden surfaces will be available whenever needed.
- Minimization of worker exposure(s) to particulate dust. Personnel shall work upwind of any operating graders or other heavy equipment to reduce worker exposure to respirable fractions.

7.4 On-Site Communications

- Individual members of the crew shall meet at the checkpoint established by the Project Manager prior to site entry and register with the SHSO.

- The SHSO shall maintain visual contact with the site team.

- Each crew member shall maintain visual contact with other crew members.

- No worker will work in an area that has been identified as a confined space without using the appropriate air supplied respiratory protective and personal protective equipment. See Appendix D for procedural guidelines to be complied with prior to entry.

  In addition, another worker shall be equipped with equivalent respiratory and personal protective equipment on stand by for rescue purposes if needed.

- Crew members who must leave the site shall inform the project manager regarding their absence.

APPENDIX A

Hazardous Waste Worker Training
General Course Outline

I. Introduction

A. Orientation and introduction
B. Course objectives

II. Regulations

A. Federal legislation

1. Superfund requirements (SARA, Title II)
2. OSHA Standard (29 CFR, 1910.1 seq.)

B. Other Agency Requirements

1. Mine Safety and Health Administration (MSHA)
2. American National Standards Institute (ANSI)

III. Environmental Incidents/History

IV. Medical Considerations

A. Routes of entry

1. Respiration
2. Skin absorption
3. Ingestion

B. Overview of toxicology

1. General considerations
2. Exposure limits
3. Material safety data sheets

V. Chemical and Physical Considerations

A. Chemical properties of matter
B. Physical properties
C. Noise
D. Other

VI. Respiratory Protection

A. General Considerations

1. Limitations of respiratory protective devices
2. Types and desctiption

B. Air-Purifying Devices

1. Particulate filters (HEPA)
2. Canisters for gases and vapors
3. Combination canisters

C. Supplied-Air Systems

1. Confined space requirements
2. Airlines and compressors
3. Air quality requirements

D. Self-contained Breathing Apparatus (SCBA)

E. Respirator Selection

F. Respirator Fit Testing

1. Semi-qualitative fit test
2. Qualitative fit test
3. Quantitative fit test

G. Care and maintenance of respirators

VII. Protective Clothing:

A. Protective materials
B. Permeation factors
C. Suiting-up and removing protective clothing

VIII. Levels of Personal Protection

A. Protection objectives
B. Levels (A-D) described

IX. Site Entry Considerations

X. Work Zones

XI. Decontamination Zones: (Zones A-D)

XII. Health and Safety Plans

XIII. Field Monitoring and Instrumentation:

A. Explosimeters
B. Direct-reading instrumentation

1. colorimetric tubes
2. carbon monoxide detectors
3. hydrogen sulfide detectors
4. oxygen level indicators

APPENDIX C

The Decontamination Layout presented in this appendix is intended to be generic in order to provide an overview of the basic Zones and Stations that shall be established for the personal decontamination of protective clothing and equipment prior to leaving a hazardous waste site. It is to be emphasized that specific plans for Decontamination Stations will vary depending upon the level(s) of Protection (i.e., Levels A-D) that are employed. Accordingly, the basic layout will be either enhanced and/or simplified as indicated by work site progress and as directed by the SHSO.

A. Exit Zones

- Exclusion Zone (within the contaminated area)
  - segregated equipment drop
  - outer garment, boots and glove wash
  - outer garment removal
- Contamination Reduction Zone
  - outer garment removal
  - air tank change (and return to exclusion area)
    or
    respiratory protective equipment removal (to exit the site)
  - inner protective clothing removal
- Support Zone (behind the contamination control line)
  - field wash (wash basins, showers, etc.)
  - toilet facilities
  - redress area
  - rest facilities
  - equipment supply/resupply

B. Decontamination Equipment

- Exclusion Zone:
  - various size containers
  - plastic liners
  - plastic drop cloths
  - decon solution and/or detergent water
  - wastewater collection facility
- Decontamination Reduction Zone:
  - auxiliary air tanks
  - boot covers, gloves, tape
  - 30-50 gal. containers with water/decon solution
  - bench or stool
  - soap, towels
  - plastic sheeting
- Support Area:
  - all other support equipment as needed

APPENDIX E

Industrial hygiene and environmental monitoring equipment shall be provided by the SHSO for the purpose of monitoring employee's exposure to chemical contaminants and physical conditions that on-site personnel might potentially be exposed to. All equipment shall be maintained in good working order and shall be periodically calibrated to insure operational accuracy.

Protocols for testing specific contaminants shall meet requirements as cited in 29 CFR, 1910.120; and all equipment shall be operated as directed by the manufacturer(s). All calculations performed to evaluate worker's exposure on an 8 hour time weighted average shall be prescribed in 29 CFR, 1910.120. All measurements shall be referenced to current permissible exposure levels (PEL's) as cited in the following:

(a) 29 CFR 1910.10, subpart Z
(b) CA. Administrative Code, Title 8
(c) ACGIH, Recommended Threshold Limit Values, 1987-88.

Minimally, the following instrumentation and/or analytical equipment shall be provided on site:

- oxygen level indicator
- carbon monoxide (CO) indicator
- hydrogen sulfide (H2S) meter
- combustible gas meter (%LEL) and (ppm)
- direct reading colorimetric tube indicators
  - Draeger hand pump
  - various specific gas colorimetric tubes
- photo-ionization detection meter (HNU photoionizer) for the detection of volatile organic vapors
  - 10.7 eV UV lamp source
  - optional strip chart recorder for hard copy recordation
- personal passive monitoring badges
- personal portable air sampling pumps
  - field calibration equipment
  - appropriate sampling train(s)
- portable hand-held noise meter (dba weighted, slow response and peak hold capability)
- portable personal noise dosimeters
- heat stress monitor (WBGT)
- hazardous categorization field kit (Haz-Cat)

TABLE OF CONTENTS

1.0 EMERGENCY TELEPHONE NUMBERS

Local Services

In those instances where work sites and work site activities are located in geographic areas of the state that are served by the "911" Emergency Telephone System, then communication with local emergency services will be used.

Police Department	911
County Sheriff	911
City Fire Department	911
Ambulance Service	911

Otherwise, specific telephone numbers will be provided for the above emergency services in those areas not served by the "911" system prior to the start of the project.

National Emergency Response Center: (24 hour number)	(800) 424-8802
CA State Office of Emergency Services: (24 hour number)	(800) 852-7550

Toxic Hazard Information

CHEMTREC (24 hour number)	(800) 424-9300

Universal Engineering Contacts

Dispatch (24 hour number) Wayne Turnage, President Dale Turnage, Vice-President Ron Jones	(707) 746-6699

2.0 GENERAL INFORMATION AND POLICIES

Because of the generic nature of this proposal and the attached health and safety plan, it is not possible to provide a detailed list of anticipated chemicals that might be encountered in various site mitigation situations. Actual concentrations at the site will most likely vary considerably; as will also the risk of exposure of workers to potentially hazardous chemicals.

For these reasons and in accordance with requirements as stated in the CA Administrative Code, Title 8, (Section 5194) Material Safety Data Sheets (MSDS's) for a wide spectrum of individual chemicals will be made available on-site for the purpose of providing workers with current and specific health information.

It is the policy of Universal Engineering, Inc. to provide all employees and subcontractors with information and procedures for the safe and healthful conduct of projects. Universal Engineering's employees working on all projects covered under this contract shall have MSDS information available in the employee rest area for their access and convenience.

All Universal Engineering personnel must follow procedures as are set forth in this document. Further, any subcontractors that might be employed for the successful completion of any contract covered under this Request for Proposal (RFP) must develop their own health and safety procedures; they may be modeled after Universal Engineering, Inc.'s procedures, but shall in no case be less than those as adopted by Universal Engineering, Inc. The subcontractor's health and safety procedures must be reviewed and approved by Universal Engineering's Industrial Hygienist/ Environmental Safety Manager prior to initiation of any field work.

It will be required of any employee that he/she bring to the attention of his supervisor any unsafe or hazardous condition that he observes as he carries out his project responsibilities. The supervisor shall in turn inform the Site Health and Safety Manager promptly so that the situation can be corrected and project personnel advised accordingly.

It is clearly impossible to anticipate all specific safety and health hazards beforehand; therefore, working personnel must exercise common sense and good judgment in their approach to a given situation. The Health and Safety Training described in Appendix A of this document has been designed to assist in preparing workers employed by Universal Engineering, Inc. to recognize hazards and minimize potentially adverse situations. This plan incorporates appropriate rules, guidelines and recommended work practices contained in previously published material and referenced in 29 CFR, 1910.120, Appendix C. All project personnel shall follow the safety and health procedures set forth in the subsequent sections.

During working hours, advice on industrial hygiene and safety is available on-site from the Project Manager and the Industrial Hygienist. If there is any doubt about the safety and health impact of any procedure, advice should be sought from one of these sources.

3.0 ORGANIZATION AND RESPONSIBILITIES

3.1 The Project Manager

The Project Manager is specifically responsible for all aspects of the daily operation of the project and for its successful completion. He shall report directly to the corporate officers of Universal Engineering, Inc.

3.2 The Site Health and Safety Officer

Responsibilities of the Site Health and Safety Officer (SHSO) are delegated to the Industrial Hygienist (Occupational Health Specialist). He shall report directly to the Project Manager or his designee. The SHSO shall immediately inform the Project Manager of any health and/or safety conditions which may adversely affect the project. The SHSO is also accountable for health and safety during any visit(s) to the project or for subcontractor personnel.

The SHSO is specifically given the authority for the following actions:

- Require specific health and safety precautions prior to site entry by Universal Engineering or subcontractor personnel.
- Require any worker, including subcontractor personnel, to obtain immediate medical attention when indicated.
- Deny access to the site or to any portion thereof, when imminent health and safety risk exists.
- Order the immediate evacuation of workers, including subcontractor personnel, from any area of the site when in his professional judgment conditions warrant such action.
- Permit visitors (i.e. anyone other than Universal Engineering or subcontractor personnel) on site only at the direction of and with the permission of the SHSO.

3.3 Emergency Actions

If any emergency involving actual or suspected personnel injury occurs, the SHSO shall take the following steps:

- Remove the exposed or injured person(s) from the immediate point of danger.

19. ATTACH COPY OF WORKMAN'S COMPENSATION

20. PLOT PLAN

The plan should consists 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 Line

d) Location of all Structures

e) Location of all relevant existing equipment including tanks and piping to be removed

f) Streets

g) Underground conduits, sewers, water lines, utilities

h) Existing wells (drinking, monitoring, etc.)

i) Depth to ground water

j) All existing tanks in addition to the ones being pulled

rev. 9/88
mam

CITY OF OAKLAND
FIRE MARSHAL'S OFFICE
ROOM 201, CITY HALL
OAKLAND, CALIFORNIA 94612
273-3851

Permit No._____
Copies to_____
Date Issued_____

APPLICATION for PERMIT to INSTALL, REMOVE or REPAIR TANKS

IN THE CITY OF OAKLAND

Date 10/29/90

Application is hereby made for permit to ~~install~~ remove ~~XXXX~~ gasoline ~~XXXX~~ tank and excavate, commencing four feet inside the curb line ~~inside the property line~~

on the east side of 37th Avenue ~~Ave.~~ ~~feet~~ ~~of~~ ~~St.~~ Ave.

House No. and Street 3801 East 8th Street ~~Street~~ ~~Avenue~~ Present storage vacant

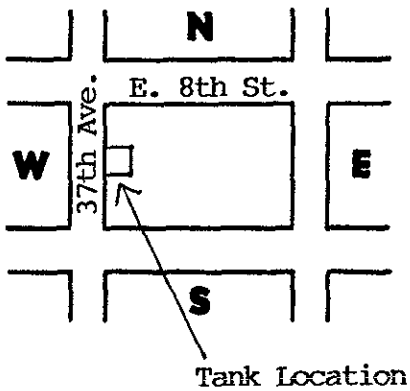
Owner American Nat'l. Can Co. Address 8770 W. Bryn Mawr Ave. Chicago, IL 60631 Phone 312/399-3162

Applicant Universal Engineering, Inc. Address 610 Industrial Way Benicia, CA 94510 Phone 707/746-6699

Remarks

Sidewalk surface to be disturbed 4' X 8' Number of Tanks 1 Capacity 500 Gallons each

Signature Judith G. Peters



Project # U577118

Fee Paid $375.00

Date November 14, 1990

538-67 (8/67) (93)

APPROVED
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 these 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 craftsman involved with the removal.

Any changes or alterations of these plans and specifications must be submitted to this Department and to the Fire and Building Services 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:

_____ 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 NON-COMPLIANCE WITH OBTAINING PERMITS

C. Chapman 11/21/90

DUNN GEOSCIENCE CORPORATION

12 METRO PARK ROAD
ALBANY, NY 12205
(518) 458-1313
FAX (518) 458-2472

91 OCT 18 PM 1:15

October 11, 1991

Mr. Robert Weston
Hazardous Materials Specialist
Alameda County Health Agency
80 Swan Way, Room 200
Oakland, California 94621

Dear Mr. Weston:

Subject: ANC Oakland Facility, Quarterly Groundwater Monitoring

This letter confirms our telephone conversation of earlier today during which you provided comments on our letter of September 20, 1991. Thank you for your timely consideration and review of our proposed changes to the sampling plan being followed at the subject site. As Dunn understands your suggestions, the following modified sampling plan, with deletions lined out and additions in boldface and EPA Methods in parantheses, is approved:

Area	Wells	Analysis
1	MW-12; ~~GW-5~~	BTEX (624); ~~TPH (DHS LUFT Method)~~; **TPH (5030)**;
2	MW-13; GW-6	~~VOC (8240) with TICs~~; ~~Semi-VOC (8270) with TICs~~; ~~TPH as Diesel (DHS LUFT Method)~~; **TPH as Diesel (3510);** **BTEX (624);** ~~PCB (8080)~~; Total and Field-filtered Metals: ~~Chromium~~, Nickel, Zinc, and ~~Lead~~;
3	MW-1 through MW-7, GW-1	~~VOC (8240) with TICs~~; ~~Semi-VOC (8270) with TICs~~; **VOC (624) with TICs;** **Semi-VOC (625) with TICs;** PCB (8080); **TPH as Gasoline (5030);** **TPH as Diesel (3510)** **Total Oil & Grease (5520);** Total and Field-filtered Metals: Arsenic, Barium, Nickel, Zinc, and Lead;

4	GW-3, ~~MW-8, MW-9, MW-10~~	~~VOC (8240) with TICs~~; **VOC (624) with TICs;** ~~Semi-VOC (8270) with TICs~~; **Semi-VOC (625) with TICs;** ~~PCB (8080)~~; Total and Field-filtered Metals: Arsenic, Barium, Chromium, Nickel, Zinc, Lead, and Silver;
	MW-8, MW-9, MW-10	**Total and Field-filtered Metals: Arsenic, Barium, Chromium, Nickel, Zinc, Lead, and Silver;**
5	MW-11, ~~GW-4~~	~~VOC (8240) with TICs~~; **VOC (624) with TICs;** ~~Semi-VOC (8270) with TICs~~; ~~PCB (8080)~~; **TPH as Gasoline (5030);** **TPH as Diesel (3510);** Total and Field-filtered Metals: Zinc, Lead.

The data package resulting from these analyses should provide sufficient information to adequately monitor the groundwater at the site, while at the same time providing some economy by eliminating unnecessary analyses. If this sampling plan is other than what Alameda County or the RWQCB requires, please advise me.

Very truly yours,

DUNN GEOSCIENCE CORPORATION

Edward W. Alusow

Edward W. Alusow
Senior Environmental Scientist
Project Manager
Registered Geologist No. 4282

EWA/me

cc: J. Peters
J. Moran
E. So

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)

Certified Mailer #: P 062 128 174

December 5, 1990

Mr. Richard K. Baker
American National Can Company
8770 West Bryn Mawr
Chicago, Illinois 60631

Dear Mr. Baker:

I have reviewed the February 16, 1990, Dames & Moore report, titled "Phase I Environmental Site Investigation," for the American National Can Company facility, located at 3801 East 8th Street, Oakland, California. This report was sent to the San Francisco Bay Regional Water Quality Control Board (RWQCB) under cover letter dated March 5, 1990, from Cynthia Tasker of Derby, Cook, Quinby, and Tweedt. This report describes the soil boring and groundwater well installation activities that occurred from August through October of 1989. Five wells were installed roughly around the perimeter of the property, with GW3 installed near the location of a former solvent storage underground tank farm, and GW4 near a former drum storage area. One well, GW6, already existed at the site, and is located on the northeastern portion of the site.

The report notes that during water level measurements performed on October 6, 1989, GW6 was found to have free product and was not sampled. On Table 1 of the report, which presents the water level measurements of the six wells, it states, "Floating product encountered at a depth of 14'11", measured thickness of 4'4"." This report does not discuss if any attempt at removing the free product was made, nor does it provide any information on what the floating product is, where it is coming from, or why the well was there.

This floating product constitutes an unauthorized release, which requires American National Can to report this unauthorized release to the RWQCB and to the Alameda County Hazardous Materials Division within five days of the discovery of the release. There is no information that indicates American National Can notified either agency at the time the floating product was encountered.

In addition, 9,000 parts per billion of 2,4 - Dimethylphenol was detected in GW1. This value is over 20 times greater than the applied action level set by EPA. Benzene, toluene, 1,1 - Dichloroethane, and vinyl chloride were detected in either or both GW1 and GW2 above the California Applied Action Level limits. Again, no attempt was made to notify the appropriate agencies within the time frame.

To address these items, you are required to:

1. Immediately remove any floating product in GW6 and identify it. This well shall be visually monitored on a bi-weekly basis, and samples are to be analyzed quarterly for the appropriate constituents.

2. Begin quarterly monitoring of all groundwater wells immediately and submit reports of analyses to both RWQCB and Alameda County.

3. Provide a workplan, **within 30 days** of the date of this letter, to the RWQCB and Alameda County that address the issue of contamination in GW6 and in GW1 and GW2. Items to be addressed include identifying and investigating the source of contamination of GW6, and investigating the lateral and vertical extent of the contamination in the soils around GW6. In addition, a groundwater investigation needs to be performed to determine the extent of groundwater contamination surrounding this area. For GW1 and GW2, delineate the extent of subsurface contamination and identify the source of contamination.

This is a formal request for technical reports pursuant to California Water Code Section 13267(b). Alameda County works in conjunction with the RWQCB. All reports, proposals, and analytical results pertaining to this investigation must be sent to our office, and to Lester Feldman of the RWQCB. His address is:

Lester Feldman
Regional Water Quality Control Board, San Francisco Bay Region
1800 Harrison Street, Suite 700
Oakland, CA 94612

To cover our costs for overseeing this case, Alameda County Ordinance, Article 11, Section 3-141.6, allows the Hazardous Materials Division to request a deposit to bill against. The hourly rate is $60.00 per hour. All monies not used during the oversight process will be refunded. Please submit a check, payable to Alameda County, for $600.00.

Failure to respond or a late response will result in referral of this case to the RWQCB or District Attorney's office for enforcement.

If you have any questions concerning this letter, please call me at 415/271-4320.

Sincerely,

Cynthia Chapman

Cynthia Chapman
Hazardous Materials Specialist

c: Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, San Francisco Bay Regional Water Quality Control Board
Howard Hatayama, California Department Of Health Services

American National Can

January 26, 1990

Mr. Thomas F. Peacock
Senior HMS
Hazardous Materials Division
Alameda County Health Care Services
80 Swan Way, Room 200
Oakland, CA 94621

RE: FINAL NOTICE OF VIOLATION
AMERICAN NATIONAL CAN COMPANY - OAKLAND FACILITY

Dear Mr. Peacock:

The correspondence received at the Oakland plant from your office was just forwarded to us. As you may be aware the Oakland facility closed a year ago. We regret that your earlier correspondence was not forwarded to us earlier so that we could try to clarify the status of the underground tanks at the Oakland facility.

American Can and National Can merged in late 1987 and the Oakland facility was a former American Can plant. We have obtained records which indicated that eight underground storage tanks were located at facility. According to these records the following is the disposition of these tanks:

TANK	DISPOSITION	DATE
4,000 gal. lacquer	removed	05-86
12,000 gal. fuel oil	cleaned & grouted in place	05-86 ←
8,500 gal. coating material	removed	07-87
8,500 gal. coating material	removed	07-87
2,500 gal. coating material	removed	07-87
2,500 gal. solvent	removed	07-87
6,300 gal. coating material	removed	07-87
4,200 gal. solvent	removed	07-87
500 gal gasoline	removed	~1992

During a recent site inspection of the facility some piping was observed which indicated the possibility of an underground tank in the northeast corner at 37th Avenue. We do not know if this tank was also closed in place. We were previously unaware of the existance of this tank. As soon as we can establish the status of this tank we will submit a closure plan for this tank if it has not been previously closed in place.

A representative of my staff, Judy Peters, will be in the Oakland area in early February and it would be most helpful if a meeting could be arranged. Ms. Peters will contact you shortly to discuss this possibility.

We regret that this matter was not handled sooner. In the future please direct all correspondence to me as follows:

Mr. Rohinton Rivetna
Director - Environmental Engineering - 04D
American National Can Company
8770 W. Bryn Mawr Avenue
Chicago, IL 60631

If you have any questions or require additional information, please do not hesitate to contact the undersigned at (312) 399-3392.

Yours very truly,

AMERICAN NATIONAL CAN COMPANY

R. M. Rivetna
Director
Environmental Engineering

RMR/dh/JP267
cc: Gil Jensen
Alameda County District Attorney
24405 Amador Street
Hayward, CA 94544

American National Can

October 26, 1989

Rafat A. Shahid, Chief
Hazardous Materials Program
80 Swan Way, Rm 200
Oakland, Ca 94621

10/30/89
ALAMEDA COUNTY
DEPT. OF ENVIRONMENTAL MGT.
HAZARDOUS MATERIALS

Re 3801-E 8th St.

Dear Mr Shahid,

As you may know this plant ceased manufacturing on January 6, 1989. It is my understanding that prior to that date all undergrounds tanks had been filled or removed. Further, it is my understanding that such procedures had been in compliance with laws and regulations then in existence.

If your records show tanks to be in existence at this location you should identify same so we can determine why that is so.

Very truly yours,

Hugh Ewing
Human Resources Manager.

cc S. Dover, SANL
cc J. Peters Ltr

American National Can

August 24, 1988

TO: Mr. Ariu Levi
Hazardous Mat. Spec

FROM: Purman Hale
Prod. Mgr.

RE: AB2185 Bus Plan.

Per our phone conversation 8/22/88, Oakland American National Can plant is planning to be closed by the end of the 4th quarter of 1988.

Purman Hale

Production Manager

PH:ng

This place had
Total of 8 TANKS
6 Removed
2 closed in place

3801 58th 9761 437-5300

American National Can Company/P.O. Box 2092, Oakland, California 94604 (415) 536-2400

Excavation Permit Granted _____ No. _____

CITY OF OAKLAND

Permit to Excavate and Install, Repair, or Remove Inflammable Liquid Tanks.

Tank Permit No. 9004

Oakland, California, July 1, 19 87

PERMISSION IS HEREBY GRANTED TO XXXXX remove / XXXXX Gasoline tank and excavate commencing _____ feet inside property line on the north side of Alameda Street Avenue feet _____ of _____ Street Avenue

House No. 3801 East 8th Street Street Avenue Present Storage _____

Owner American Can Packaging Company Address 3801 East 8th Street Phone 437-5347

Applicant Aqua Terra Technologies Address 2950 Burkirk Ste 120 Walnut Creek 94596 Phone _____

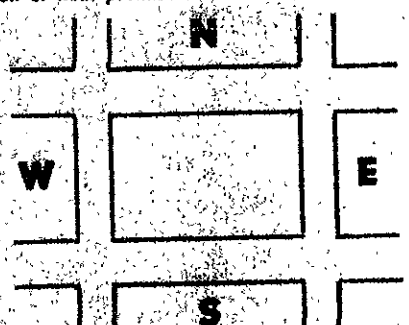
Dims: _____ of street (sidewalk) surface to be disturbed _____ X _____ Number of Tanks 6 Capacity 6000-10,000 Gallons, each.

Remarks: Removal to occur during week of 13 July

This Permit is granted in accordance with existing City Ordinances.
Owner hereby agrees to remove tanks on discontinuance of use or when notified by the City Authorities.
When installing, removing or repairing tanks, no open flame to be on or near premises.

Approved _____ Fire Marshal

Approved _____ Drainage Division Engineering Dept.



EXCAVATING PERMIT

Issued in accordance with Ord. No. 276 CMS, Sec. 4-2.04

_____ square feet of digging or removal granted.

The r... of $_____ special deposit is hereby acknowledged.

GENERAL DEPOSIT.

BUREAU OF PERMITS AND LICENSES.

CERTIFICATE OF TANK AND EQUIPMENT INSPECTION

Inspected and passed on _____ 19____

By _____ Fire Marshal

Inspection Fee Paid . . . . . $ 50.00 ck#4009 rec#118048

Received by G. M. Johnson FIRE PREVENTION BUREAU

NOTICE

Before Covering Tanks, Above Certificate Must Be Signed.

When ready for inspection notify Fire Prevention Bureau, 273-3851

THIS PERMIT MUST BE LEFT ON THE WORK AS AUTHORITY THEREFOR.

538.68 (6-67)

1st fill UG TANKS

March 24, 1986

AQUA TERRA Technologies

Mr. T.M. Gerow, Public Health Engineer
Underground Storage Tank Program
Division of Environmental Health
Alameda County Health Care Services Agency
470 Twentyseventh Street, Third Floor
Oakland, CA 94612

Subject: Underground Tank Closure
American Can Company
3801 East Eighth Street
Oakland, CA 94601

Dear Mr. Gerow:

This letter presents our proposed plan for closure of an underground tank at the subject site. The tank was previously described to you for closure by excavation in our transmittal of March 7, 1986.

The 12,000 gallon tank, used for diesel fuel storage, is located in an area where excavation of the tank is not practical; therefore, the tank will be filled with a concrete slurry. A soil boring was drilled in the vicinity of the tank to assess prior leakage, the results of the soil and grab groundwater sample analyses will be transmitted to you under separate cover by American Can Company.

The tank contents were removed earlier this month. During pumping of the tank, groundwater inflow to the tank was observed. Therefore, in order to facilitate closing the tank, we propose to first place concrete in the bottom half of the tank to prevent groundwater inflow and allow recovery of any residual liquids. The concrete will be placed through a pipe at the tank bottom so that liquid in the tank will be displaced above the concrete fill. Displaced liquids will be removed by a vacuum truck for disposal at an appropriate facility off-site. Once the displaced liquid is removed, the remaining volume of the tank will be filled. All piping from the tank will be cut and capped at the locations where the pipes first surface.

The concrete box overlying the tank will be filled with clean select fill, and asphalt surfacing will be placed and finished to match existing grade.

Upon receipt and review of the soil and groundwater analytical data from American Can Company, please contact me if you have any questions or comments. A few days prior to our closing the tank, we will notify you so that you may observe the closure.

I understand from previous correspondence with you that Alameda County has not established a permitting process for underground tank closure. If the status of your program changes, please notify me so that we may obtain the necessary permits.

Sincerely,

Aqua Terra Technologies, Inc.

R. Wane Schneiter, Ph.D., P.E.
Project Manager

RWS:lg

cc: D.P. Bergeson, American Can Company

LETTER OF TRANSMITTAL

AQUA TERRA Technologies

Date: March 7, 1986

To: Mr. T.M. Gerow, Public Health Engineer
Underground Storage Tank Program
Division of Environmental Health
Alameda County Health Care Services Agency
470 Twentyseventh Street, Third Floor
Oakland, CA 94612

From: R. Wane Schneiter
Project Manager

Re: Underground Tank Excavation
American Can Company
3801 East Eighth Street
Oakland, CA 94601

LG
file UGTANKS

Attached is a specification for excavation of two undergound storage tanks at the subject site. We plan to complete this work within the coming few weeks. As we understand from previous correspondence with you, Alameda County has not yet established a permitting process for underground tank closure. If the status of your program changes, please notify me.

A few days prior to our excavating the tanks, we will notify you so that you may observe the closure.

If you have any questions or comments regarding the planned action, please contact me.

RECEIVED
MAR 10 1986
ENVIRONMENTAL HEALTH
ADMINISTRATION

3490 Buskirk Avenue, Suite A, Pleasant Hill, CA 94523 415 934-4884
Aqua Terra Technologies / Environmental Consultants

SPECIFICATIONS

SECTION 1

GENERAL CONDITIONS

1-01 WORK TO BE DONE

The project consists of removing from service two underground storage tanks. The tanks will be removed from service by excavating for disposal off-site. Disconnecting, blocking, and/or removing piping associated with the tank will be part of removing the tank from service.

One underground tank has a capacity of approximately 15,000 gallons, is constructed of steel, and was used for diesel fuel storage. The other tank has a capacity of approximately 4,000 gallons, is constructed of steel, and was used for vinyl resin storage. The excavated tanks will be removed and transported to a hazardous waste disposal facility or cleaned until "nonhazardous" and cut-up for disposal. Any residues remaining in the tank will be removed and transported to a hazardous waste disposal or recycle site. The excavation will be backfilled with clean fill material or pea gravel, the fill will be compacted, and asphalt will be placed at the excavated area and finished to match existing grade.

Analytical and geotechnical results obtained from a test boring drilled in the immediate vicinity of the tanks are attached. The results include a detailed boring log and test results of soil samples taken from the test boring. A pre-bid inspection of the work site will be conducted.

1-02 DEFINITIONS

The following terms shall be as defined herein.

Owner. The word "Owner" shall mean American Can Company. The Owners representative shall be Mr. D.P. Bergeson or his designate.

Contractor. The word "Contractor" means the person, firm or corporation with whom the Contract Agreement is made. Instructions and information tendered by the Engineer to

the Contractor's superintendent or agent on the work site shall be considered as having been received by the Contractor.

Engineer. The term "Engineer" means Aqua Terra Technologies, Inc., 3490 Buskirk Avenue, Suite A, Pleasant Hill, CA, 94523, (415) 934-4884.

Days. The word "Days" shall mean calendar days.

1-03 CONTRACT AGREEMENT

The bidder to whom award is made shall execute a written Contract Agreement and required supplementary documents and submit them to the Owner.

If any part of the work to be done under this Contract is subcontracted, the subcontract shall provide that all work to be performed thereunder shall be performed in accordance with the terms of the Contract Agreement. The subcontracting of any or all of the work to be done will in no way relieve the Contractor of any part of his responsibility under the Contract.

1-04 COMMENCEMENT OF WORK AND TIME ALLOWED FOR COMPLETION

The Contractor shall commence the work covered by this Contract within 15 days from receipt of authorization to proceed, unless other arrangements are made with the Engineer. Work on this project shall be completed within 30 days from receipt of authorization to proceed.

1-05 PERMITS AND FEES

The Contractor shall obtain and pay for all construction permits and licenses except for those which will be obtained by the Engineer specifically defined elsewhere in this specification. The Owner will assist the Contractor, when necessary, in obtaining such permits.

The Owner will obtain specific permits for closure of the underground storage tanks.

1-06 SAFETY

In accordance with generally accepted construction practices and State Law, the Contractor shall be solely and completely responsible for conditions on the job site, including safety of all persons and property during performance of the project.

This requirement shall apply continuously and not be limited to normal working hours.

The services of the Engineer in conducting construction review of the Contractor's performance is not intended to include review of the adequacy of the Contractor's work methods, equipment, or safety measures in, on, or near the construction site.

1-07 STATUS OF CONTRACTOR

It is stipulated and agreed that the Contractor shall be an independent contractor in the performance of this Contract and shall have complete charge of persons engaged in the performance of the work. The Contractor shall perform the work in accordance with his own methods, subject to compliance with the requirements of the Contract.

1-08 AUTHORITY OF ENGINEER

In all matters relating to acceptability of construction, materials, equipment, or methods, matters relating to execution and progress of work, percentage of completion, interpretation of Contract Documents and delays, the Engineer shall, within a reasonable time, render a decision on such a matter, which decision shall be final and conclusive.

1-09 TESTS

Where the Specifications require work to be specially tested or approved, it shall be tested only in the presence of the Engineer after timely notice of its readiness for inspection and test, and after testing the work shall be covered up only upon the consent thereto of the Engineer.

Regardless of any test results, the Contractor is solely responsible for the quality of workmanship and materials.

1-10 METHODS AND APPLIANCES

The methods and appliances adopted by the Contractor shall be such as will, in the opinion of the Engineer, secure a satisfactory quality of work and will enable the Contractor to complete the work in the time agreed upon. If at any time the methods and appliances appear inadequate, the Engineer may order the Contractor to improve their character or efficiency, and the Contractor shall conform to such order; failure of the Engineer to order such improvement

of methods or efficiency will not relieve the Contractor from his obligation to perform satisfactory work or to finish it in the time agreed upon.

1-11 LINES AND GRADES

The Contractor shall lay out all work, and shall be responsible for any errors resulting therefrom. In all questions arising as to proper location of lines and grades, the Engineer's decision will be final.

1-12 PROTECTION OF WORK, PROPERTY AND PERSONS

The Contractor shall be responsible for the care of all work until its completion and final acceptance; and shall, at the Contractor's own expense, replace damaged or lost material and repair damaged parts of the work. The Contractor shall make his own provisions for properly storing and protecting all material and equipment against theft, injury, or damage from any and all causes. Damaged material and equipment shall not be used in the work.

1-13 CHANGES IN THE WORK

Without invalidating the Agreement, the Owner may, at any time or from time to time, order additions, deletions or revisions in the work. These will be authorized by Change Orders. Upon receipt of a Change Order, the Contractor shall proceed with the work involved. All such work shall be executed under the applicable conditions of the Contract Documents.

1-14 BASIS OF PAYMENT

Payment will be based upon the Contract lump sum and the Contractor's Schedule of Charges for all work provided on a time and materials basis (Contractor shall attach his Schedule of Charges). The Contractor's invoice will be paid following Owner's final acceptance of the work.

When the work is performed by other than the Contractor's organization, the Contractor shall reach an agreement with such other forces as to the distribution of payments made for such, and no additional payment therefore will be made by the Owner.

SECTION 2

SLAB DEMOLITION AND UNDERGROUND TANK EXCAVATION

2-01 GENERAL

The Contractor shall demolish and remove from the site the concrete and asphalt paving in the general area overlying the underground tank. Minimal demolition will be required for removal of the underground tank.

The existing concrete slab overlying the 4,000 gallon tank, and the concrete piping vault overlying the 15,000 gallon tank shall be broken into pieces suitable for transport to off-site disposal. Asphalt surrounding the concrete slab and vault shall be broken to a clean edge, where necessary for excavation of the tank.

2-02 PIPING

The Contractor shall break all surface connections for outlet, inlet, vent, and gauge piping. The pipe leading to and from the tanks shall be cut, threaded, and capped at the excavation face and at the locations were the pipes first surface.

2-03 TANKS

The Contractor shall remove the tanks by excavation. Excavation shall be limited to the minimum area and depths required to remove the tank.

Prior to beginning excavation, the contractor shall establish elevation control on the buildings adjacent to the area of excavation. The elevation control shall be periodically confirmed during excavation and at the completion of backfilling and compaction.

2-04 PAYMENT

Payment for slab demolition and tank excavation shall be made in accordance with the lump sum quoted.

SECTION 3

TANKS AND EXCAVATED MATERIALS DISPOSAL

3-1 GENERAL

The underground storage tank contained diesel fuel and vinyl resin which is a hazardous waste. Therefore, the tanks will be treated as a hazardous waste.

It is expected that some hazardous material residues will remain in the tank during excavation. This is material that could not be removed by normal pumping equipment installed for the tank.

Organic analysis of soil samples collected from a soil boring placed in the backfill for both tanks indicated that petroleum and other hydrocarbons were present. Therefore, although non-hazardous, the excavated soils will be disposed at a Class II-1 landfill.

3-2 LIQUID WASTES

Liquid wastes may originate from residual materials contained within the tanks and tank piping.

The Contractor shall collect all liquid removed from the tanks. The Contractor will capture all liquid, if any, contained in piping associated with the tank prior to disconnecting. These materials shall be collected by the Contractor and placed into appropriate sealed containers for recycle or disposal. Methods shall by employed which avoid release of any of the material to the ground.

It is estimated that the volume of liquid hazardous material residue which must be removed from the tank for the transport and disposal off-site is less than approximately 200 gallons.

The Engineer will provide the required documentation for transport and disposal or recycle, and identify the facility to which the liquid shall be delivered by the Contractor.

3-03 SOLID WASTES

The tank and piping removed by excavation will be considered hazardous waste. The Contractor will dispose of the tank

and piping to an authorized hazardous waste receiver or hazardous waste disposal site as approved by the Engineer. All transport and disposal documentation as required by applicable laws and regulations will be defined by the Engineer.

Soils removed by tank excavation will be considered non-hazardous. The Contractor shall place excavated material directly into containers for off-site disposal by the Contractor. The disposal site for excavated materials shall be determined by the Contractor and approved by the Engineer.

The Contractor shall excavate and dispose, as directed by the Engineer, any contaminated material in excess of that required to remove the tanks.

Alternatively, tanks may be decontaminated at the excavation site. All liquids and other materials employed for decontamination shall be disposed of according to appropriate protocol for potentially hazardous waste. The tanks shall be certified to be free of contamination by an approved analytical laboratory prior to transport from the site for disposal.

3-04 PAYMENT

Payment for tanks and excavated materials disposal which is limited to include the tanks and any materials excavated to allow removing the tanks, shall be according to lump sum. Excavation and disposal of material excavated at the direction of the Engineer which is not required for removal of the tanks, shall be paid at time and materials rates quoted by the Contractor and accepted by the Engineer according to the Schedule of Charges submitted with the Contractor's original bid.

SECTION 4

BACKFILL AND GRADING

4-01 GENERAL

When excavation of the tank and soils has been completed, the excavation shall be backfilled with imported clean fill material or pea gravel.

After the excavation is backfilled, the work area shall be graded to match the original surface contours which existed prior to excavation. The backfill shall be graded to allow resurfacing with an asphaltic concrete paving with a minimum thickness of three (3) inches.

Compaction of backfill will be determined by the Engineer.

4-02 BACKFILL MATERIAL

Prior to placing the backfill material, a firm and stable base should be prepared by removing all loose soil from the excavation. An initial working pad of granular material shall be placed to the satisfaction of the Engineer. No backfill material shall contain vegetable matter, reinforced concrete, roots, wood, debris, or any material that the Engineer has determined to be unsuitable.

Imported material shall consist of a well graded granular material with a maximum rock size of approximately three inches or shall consist of pea gravel.

All soil backfill shall be placed in layers not exceeding eight (8) inches in thickness prior to compaction. Backfill shall be compacted to at least 90 percent relative compaction in accordance with ASTM D1557 test procedure. If pea gravel is used for backfill, it shall be placed in layers not exceeding 24 inches in thickness. The pea gravel shall be compacted by vibration to the satisfaction of the Engineer.

The upper six inches of the backfill, whether graded soil or pea gravel, shall consist of Class II aggregate base rock in accordance with Section 26 of Cal-Trans Standard Specifications.

Unsuitable backfill material shall be disposed of off-site

by the Contractor.

4-03 COMPACTION

The Contractor's equipment and method for compaction of backfill shall be approved by the Engineer and shall consist of vibratory methods. Compaction by flooding, ponding, or jetting is not permitted.

Compacted fill shall be subject to inspection by the Engineer.

4-04 ROUGH GRADING

The site shall be rough graded to match the contours of the original grade which existed prior to excavation.

4-05 PAYMENT

Payment for backfill and grading shall be according to lump sum. Any additional work directed by the Engineer will be at time and materials rates according to the Schedule of Charges submitted with the Contractor's bid.

SECTION 5

ASPHALT CONCRETE PAVING

5-01 GENERAL

The Contractor shall resurface the area of excavation with new asphaltic concrete paving. The asphaltic paving shall have a minimum thickness of three (3) inches.

5-02 SUBGRADE PREPARATION

The soil subgrade on which the slab will be constructed shall be firm and non-yielding, and free of loose material.

5-03 ASPHALT CONCRETE PAVING

Asphalt concrete paving shall conform with Section 39 of Cal-Trans Standard Specifications. The paving shall be placed to a minimum thickness of three (3) inches and finished to match existing grade.

5-04 PAYMENT

Payment for asphalt concrete paving shall be made according to the lump sum quoted by the contractor.

SECTION 6

CLEANUP

6-01 GENERAL

During the progress of the work, the Contractor shall keep the premises occupied by him in a neat and clean condition, disposing of refuse in a satisfactory manner.

At no time shall there be any accumulation of rubbish, excavated material or equipment that will interfere with the convenience or operation of others or result in unsightly appearance of the work.

6-02 PROTECTION OF WORK

The Contractor shall be responsible for the care of all work until its completion and final acceptance, and he shall protect the site from erosion or drainage of material out of the work area.

6-03 FINAL CLEANUP

Prior to final acceptance of the work, the Contractor shall remove all temporary structures built by or for him, and remove all equipment and surplus construction material and debris from the area. The entire project, before acceptance by the Owner, shall be left in a neat and clean condition.

The Contractor shall replace any fencing or other structures removed by him for access to the work site to the same condition at which they existed prior to his commencing work.

6-04 PAYMENT

Payment for cleanup shall be according to the lump sum quoted by the Contractor.

(25Amcan.Spec)

Official Registration Form

California Water Resources Control Board

Hazardous Substance Storage Statement

Who Must File: [illegible] hazardous substances in any underground [illegible] on or after January 1, 1984 (After October 1, 1984 for [illegible] of tanks used on farms)

Definition of Underground Containers: This law applies to [illegible] containers. (Water Code [illegible]) Containers including earthen walled pits, ponds, lagoons, and tanks [illegible] at or below the normal ground surface level must be listed. A tank [illegible] on the ground is not included. Containers partially beneath the surface and enclosed. Lined or unlined pits, ponds and lagoons are covered even [illegible] is removed from the storage area to construct the facility. Normal [illegible] not considered construction below ground level.

Definition of Hazardous Substance: Any substance listed in Section 6382 of the Labor Code or in Section 25316 of the Health and Safety Code. This includes gasoline, diesel fuel, all industrial solvents, pesticides, herbicides and fumigants. If the material must be carried by a registered hauler, disposed of at a hazardous waste site, is explosive, generates pressure due to heat or decomposition or would harm humans or wildlife you must register the tank. Wastes are [illegible].

Fee: For each tank [illegible] stored, a $10 [illegible] must be paid [illegible] that retail [illegible] Stations pay $5 per tank.

Penalties: [illegible] fail to file the penalty is $500-$5,000 per day. If you falsify [illegible] can be fined up to $20,000 for each day the information is incorrect and has not been corrected.

Confidentiality: If you have information protected by trade secret laws, please attach a list of the information on this form that is confidential and the justification for confidentiality, including specific citations of relevant statutory and case law.

Multiple Containers: Fill I and II on one form and leave it blank on all the remaining forms. Attach all forms together securely. If you own more than 50 tanks you can file information on computer tape. Call 916/324-1262 for information.

This is not a Permit Application. All Underground Tanks will be subject to local regulation. Some jurisdictions have already begun programs. Check with your local county government for further information.

NOTE: ALL UNDERGROUND CONTAINERS MUST REGISTER EVEN IF STATE AND/OR LOCAL PERMITS ARE IN FORCE.

I Owner

Owner's Name (Corporation, Individual or Agency)			
AMERICAN CAN COMPANY			
Mailing Address	City	State	ZIP
AMERICAN LANE	GREENWICH	CT	06836

II Facility

Facility Name	Owner Foreman Supervisor	
AMERICAN CAN COMPANY	L.C WEISS	
Facility Address: 3801 E. 8TH STREET	Nearest Cross Street: ALAMEDA AVE.	
City: OAKLAND	County: ALAMEDA	ZIP: 94601
Mailing Address: PO BOX 2092	City: OAKLAND	State: CA ZIP: 94604
Phone w/ area code: (415) 536-2400	Type of Business: ☐ 01 Motor Vehicle Fuel Station ☒ 02 Other METAL MANUFACTURING	
Number of Tanks at Facility: 8	Rural Areas Only: Township	Range / Section

III 24 Hour Emergency Contact Person

Name, Address, Phone Number of Person to be Contacted	Name, Address, Phone Number of Alternate Person to be Contacted
ECKMAN, RICHARD (415) 536-2400	ECKMAN, RICHARD (415) 935-3979

COMPLETE THE FOLLOWING ON A SEPARATE FORM FOR EACH CONTAINER

Confidential

IV Description

A ☒ 01 Tank ☐ Sump ☐ 03 Lagoon, Pit or Pond ☐ 04 Other _____ Container Number (If there is no number assigned) 1

B Manufacturer (if appropriate) — Year of Mfg 1963 C Year Installed 1963 ☐ Unknown

D Container Capacity 8500 gallons ☐ Unknown E Container Repairs ☒ 01 None ☐ 02 Unknown ☐ 03 Yes Year _____

F Is Container currently used? ☒ 01 Yes ☐ 02 No If No, year of last use _____ ☐ 03 Unknown

G Does the Container Store (Check One) ☐ 01 Waste ☒ 02 Product

H Does the Container Store Motor Vehicle Fuel or Waste Oil? ☐ 01 Yes ☒ No If Yes, Check appropriate box(es)

☐ Unleaded ☐ Regular ☐ Premium ☐ 04 Diesel ☐ 05 Waste Oil ☐ 06 Other (List) _____

V Container Construction

A Thickness of Primary Containment .250 ☐ Gauge ☒ Inches ☐ cm ☐ Unknown

B ☐ 01 Vaulted (Located in an underground Vault) ☒ 02 Non-vaulted ☐ 03 Unknown

C ☐ 01 Double Walled ☒ 02 Single Walled ☐ 03 Lined ☐ 04 Wrapped ☐ 05 Unknown ☐ 06 None

D ☒ 01 Carbon Steel ☐ 02 Stainless Steel ☐ 03 Fiberglass ☐ 04 Polyvinyl Chloride ☐ 05 Concrete ☐ 06 Aluminum

☐ 07 Steel Clad ☐ 08 Bronze ☐ 09 Composite ☐ 10 Non-metallic ☐ 11 Earthen Walls

☐ 12 Unknown ☐ 13 Other _____

E ☐ 01 Rubber Lined ☐ 02 Alkyd Lining ☐ 03 Epoxy Lining ☐ 04 Phenolic Lining ☐ 05 Glass Lining ☐ 06 Clay Lining

☒ Unlined ☐ 08 Unknown ☐ 09 Other _____

F ☐ [illegible] ☐ Wood Wrappings ☐ Cathodic

Confidential

VI Piping

A Associated Piping: ☒ 01 Above Ground ☐ 02 Underground ☐ 03 Vaulted

B Underground Piping: ☐ 01 Gravity ☐ 02 Pressure ☒ 03 Suction ☐ 04 Unknown

C Piping Repairs: ☐ 01 None ☒ 02 Unknown ☐ 03 Yes, Year of most recent repair _____

VII Leak Detection

☒ 01 Visual ☐ 02 Stock Inventory ☐ 03 Tile Drain ☐ 04 Vapor Sniff Wells ☐ 05 Sensor Instrument

☐ 06 Ground Water Monitoring Wells ☐ 07 Pressure Test ☐ 08 Internal Inspection ☐ 09 None

☐ 10 Other: _____

VIII Chemical Composition of Materials *Currently* or *Previously* Stored In Underground Containers

If you checked yes to IV-H you are not required to complete this section

currently stored	previously stored	CAS # (If known)	Chemical *Do Not Use Commercial Name* (Use additional paper for more room)
☒ 01	☐ 02		EPOXY:
☐ 01	☐ 02		XYLENE
☐ 01	☐ 02		METHYL AMYL ALCOHOL
☐ 01	☐ 02		METHL IBUTYL KETONE
☐ 01	☐ 02		CELLOSOLVE ACETATE
☐ 01	☐ 02		N BUTY ALCOHOL
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		

Is Container located on an Agricultural Farm? ☐ 01 Yes ☒ 02 No

IX IMPORTANT! Read instructions before signing

Signature: The form must be signed by 1) a principal executive officer at the level of vice-president or by an authorized representative. The representative must be responsible for the overall operation of the facility where the tank(s) are located 2) a general partner proprietor or 3) a principal executive officer, ranking elected official or authorized representative of a public agency.

This form has been completed under the penalty of perjury and, to the best of my knowledge, is true and correct.

Signature	Date
L.C. Weiss	6/29/94

Printed Name	Title	Phone w area code
L.C. WEISS	AREA DIRECTOR	(415) 536-2400

Send check to: Hazardous Substance Storage Statement State Water Resources Control Board, P O Box 100, Sacramento, CA 95801-0100

Person Filing Statement	Phone w area code
LAURA DEARMOND	(415) 536-2400

For additional forms or more information call 916/324-1262

FOR STATE USE ONLY

ID Number	Accounting Number	County Number

Date Received	☐ 01	☐ 02	☐ 03

Official Registration Form

California Water Resources Control Board

Hazardous Substance Storage Statement

Who Must File: [illegible] hazardous substances [illegible] order [illegible] January 1, 1984. After October [illegible]

Definition of Underground Containers: This law applies to [illegible] concrete [illegible] aboveground containers. Water Code [illegible] collectors, [illegible] ponds, [illegible] tanks [illegible] the normal ground surface level must register. [illegible] on the ground is not included. Containers partially beneath the ground and backfilled [illegible] or unlined pits, ponds and lagoons are covered. Earth [illegible] removed from the storage area to construct the tank is normally [illegible] considered construction below ground level.

Definition of Hazardous Substance: Any substance listed in Section 6382 of the Labor Code or in Section 25316 of the Health and Safety Code. This includes gasoline, diesel fuel, all industrial solvents, pesticides, herbicides and lubricants. If the material must be carried by a registered hauler disposed of at a hazardous waste site, is explosive, generates pressure due to heat or decomposition or would harm humans or wildlife you must register [illegible] tank. Wastes are included.

Fee: [illegible] each tank registered. A $[illegible] fee must be paid, except that retail gasoline stations pay $5 per tank.

Penalties: [illegible] failure to [illegible] is $500-$5,000 per day. If you falsify information, you can be fined up to $20,000 for each day the information is incorrect and has not been corrected.

Confidentiality: If you have information protected by trade secret laws, please attach a list of the information on this form that is confidential and the justification for confidentiality, including specific citations of relevant statutory and case law.

Multiple Containers: Fill I and II on one form and leave it blank on all the remaining forms. Attach all forms together securely. If you own more than 30 tanks you can file information on computer tape. Call 916/ 324-1262 for information.

This is not a Permit Application. All Underground Tanks will be subject to local regulation. Some jurisdictions have already begun programs. Check with your local county government for further information.

NOTE: ALL UNDERGROUND CONTAINERS MUST REGISTER EVEN IF STATE AND/OR LOCAL PERMITS ARE IN FORCE.

I Owner

[illegible]			
[illegible]	City	State	ZIP

II Facility

[illegible]	Dealer Facility Number
[illegible]	Nearest Cross Street
[illegible]	County / ZIP
[illegible]	City / State / ZIP
[illegible]	Type of Business: ☐ 01 Motor Vehicle Fuel Station ☐ 02 Other
[illegible] Rural Areas Only:	Township / Range / Section

III 24 Hour Emergency Contact Person

[illegible]	[illegible]
ECKMAN, RICHARD (415) 536-3400	ECKMAN, RICHARD (415) 935-3979

COMPLETE THE FOLLOWING ON A SEPARATE FORM FOR EACH CONTAINER

IV Description

Confidential

A ☒ 01 Tank ☐ 02 Sump ☐ 03 Lagoon Pit or Pond ☐ 04 Other	Container Number (If there is no number assigned) 2
B Manufacturer (if appropriate) — Year of Mfg 1963	C Year Installed 1963 ☐ Unknown
D Container Capacity 8500 gallons ☐ Unknown	E Container Repairs ☒ 01 None ☐ 02 Unknown ☐ 03 Yes Year
F Is Container currently used? ☒ 01 Yes ☐ 02 No If No, year of last use ☐ 03 Unknown	
G Does the Container Store (Check One) ☐ 01 Waste ☒ 02 Product	
H Does the Container Store Motor Vehicle Fuel or Waste Oil? ☐ 01 Yes ☒ 02 No If Yes Check appropriate box(es)'	
☐ Unleaded ☐ Regular ☐ 03 Premium ☐ 04 Diesel ☐ 05 Waste Oil ☐ 06 Other (List)	

V Container Construction

A Thickness of Primary Containment .1250 ☐ Gauge ☒ Inches ☐ cm ☐ Unknown
B ☐ 01 Vaulted (Located in an underground Vault) ☒ 02 Non-vaulted ☐ 03 Unknown
C ☐ 01 Double Walled ☒ Single Walled ☐ 03 Lined ☐ 04 Wrapped ☐ 05 Unknown ☐ 06 None
D ☒ Carbon Steel ☐ 02 Stainless Steel ☐ 03 Fiberglass ☐ 04 Polyvinyl Chloride ☐ 05 Concrete ☐ 06 Aluminum
☐ 07 Steel Clad ☐ 08 Bronze ☐ 09 Composite ☐ 10 Non-metallic ☐ 11 Earthen Walls
☐ 12 Unknown ☐ 13 Other
E ☐ 01 Rubber Lined ☐ 02 Alkyd Lining ☐ 03 Epoxy Lining ☐ 04 Phenolic Lining ☐ 05 Glass Lining ☐ 06 Clay Lining
☒ Unlined ☐ 08 Unknown ☐ 09 Other

VI Piping

Confidential

A Associated Piping ☒ 01 Above Ground ☐ 02 Underground ☐ 03 Vaulted

B Underground Piping ☐ 01 Gravity ☐ 02 Pressure ☒ 03 Suction ☐ 04 Unknown

C Piping Repairs ☐ 01 None ☒ 02 Unknown ☐ 03 Yes, Year of most recent repair ____

VII Leak Detection

☒ 01 Visual ☐ 02 Stock Inventory ☐ 03 Tile Drain ☐ 04 Vapor Sniff Wells ☐ 05 Sensor Instrument

☐ 06 Ground Water Monitoring Wells ☐ 07 Pressure Test ☐ 08 Internal Inspection ☐ 09 None

☐ 10 Other: ____

VIII Chemical Composition of Materials *Currently* or *Previously* Stored In Underground Containers

If you checked yes to IV-H you are not required to complete this section

currently stored	previously stored	CAS # (If known)	Chemical *Do Not Use Commercial Name* (Use additional paper for more room)
☒ 01	☐ 02		ENAMEL
☐ 01	☐ 02		PETROLEUM DISTILLATE
☐ 01	☐ 02		AROMATIC HYDROCARBONS
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		

Is Container located on an Agricultural Farm? ☐ 01 Yes ☒ 02 No

IX IMPORTANT! Read instructions before signing.

Signature: The form must be signed by 1) a principal executive officer at the level of vice-president or by an authorized representative. The representative must be responsible for the overall operation of the facility where the tank(s) are located 2) a general partner proprietor or 3) a principal executive officer ranking elected official or authorized representative of a public agency.

This form has been completed under the penalty of perjury and to the best of my knowledge is true and correct.

Signature		Date
L.C. Weiss		6/29/84
Typed Name	**Title**	**Phone w area code**
L.C. WEISS	AREA DIRECTOR	(415) 536-2400

Send check to: Hazardous Substance Storage Statement State Water Resources Control Board, P O Box 100, Sacramento CA 95801-0100

Person Filing Statement	Phone w area code
LAURA DEARMOND	(415) 536-2400

For additional forms or more information call 916/324-1262

FOR STATE USE ONLY

C Number	Accounting Number	County Number

Date Received	☐ 01	☐ 02	☐ 03

Official Registration Form

California Water Resources Control Board

Hazardous Substance Storage Statement

Who Must File: [illegible] hazardous substances in any underground [illegible] after January 1, 1984 (After October [illegible] 1985 for tanks on farms)

Definition of Underground Containers: [illegible] applies to concrete [illegible] underground containers. (Water Code [illegible] tanks, excluding earthen walled pits, ponds, [illegible] 90% [illegible] ground surface level and [illegible] A tank [illegible] ground is not included. Containers partially beneath the ground or [illegible] lined or unlined pits, ponds and lagoons are covered [illegible] removed from the storage area to construct the facility. Normal [illegible] is not considered construction below ground level.

Definition of Hazardous Substance: Any substance listed in Section 6382 of the Labor Code or in Section 25316 of the Health and Safety Code. This includes gasoline, diesel fuel, all industrial solvents, pesticides, herbicides and fumigants. If the material must be carried by a registered hauler, disposed of at a hazardous waste site, is explosive, generates pressure due to heat or decomposition or would harm humans or wildlife you must register.

[illegible] Tank Wastes are [illegible]

Fee: [illegible] for each tank [illegible] $[illegible] [illegible] paid except that retail [illegible] gasoline stations pay $5 per [illegible]

Penalties: [illegible] failure to [illegible] penalty is $500-$5,000 per day if you falsify information, you can be [illegible] $20,000 for each day the information is [illegible] correct and $25 for [illegible]

Confidentiality: If you have information protected by trade secret laws, please attach a list of the information on this form that is confidential and the justification for confidentiality, including specific citations of relevant statutory and case law.

Multiple Containers: Fill I and II on one form and leave it blank on all the remaining forms. Attach all forms together securely. If you own more than 50 tanks you can file information on computer tape. Call 916/324-1262 for information.

This is not a Permit Application. All Underground Tanks will be subject to local regulation. Some jurisdictions have already begun programs. Check with your local county government for further information.

NOTE: ALL UNDERGROUND CONTAINERS MUST REGISTER EVEN IF STATE AND/OR LOCAL PERMITS ARE IN FORCE.

I Owner

[illegible] (Corporation, Individual or Public Agency)			
[illegible] Address	City	State	ZIP

II Facility

[illegible] Name	Dealer, Foreman, Supervisor	
[illegible] Address		Nearest Cross Street
[illegible]	[illegible]	ZIP
[illegible] Name	City	State / ZIP
Previous Address	Type of Business: ☐ 01 Motor Vehicle Fuel Station ☐ 02 Other [illegible]	
Number of Tanks at this Facility / Rural Areas Only:	Township	Range / Section

III 24 Hour Emergency Contact Person

[illegible] Name and Telephone Number	Name and Telephone Number
ECKMAN, RICHARD (415) 536-2400	ECKMAN, RICHARD (415) 935-3979

COMPLETE THE FOLLOWING ON A SEPARATE FORM FOR EACH CONTAINER

Confidential

IV Description

A ☒ 01 Tank ☐ 02 Sump ☐ 03 Lagoon, Pit or Pond ☐ 04 Other [illegible]	Container Number (if there is no number assigned) 3
B Manufacturer (if appropriate) — Year of Mfg 1963	C Year Installed 1963 ☐ Unknown
D Container Capacity 2500 gallons ☐ Unknown	E Container Repairs ☒ 01 None ☐ 02 Unknown ☐ 03 Yes Year [illegible]
F Is Container currently used? ☒ 01 Yes ☐ 02 No If No, year of last use [illegible] ☐ 03 Unknown	
G Does the Container Store (Check One) ☐ 01 Waste ☒ 02 Product	
H Does the Container Store Motor Vehicle Fuel or Waste Oil? ☐ 01 Yes ☒ 02 No If Yes, Check appropriate box(es)	
☐ Unleaded ☐ 02 Regular ☐ 03 Premium ☐ 04 Diesel ☐ Waste Oil ☐ 06 Other (List) [illegible]	

V Container Construction

A Thickness of Primary Containment .250 ☐ Gauge ☒ Inches ☐ cm ☐ Unknown	
B ☐ 01 Vaulted (Located in an underground Vault) ☒ 02 Non-vaulted ☐ 03 Unknown	
C ☐ 01 Double Walled ☒ 02 Single Walled ☐ 03 Lined ☐ 04 Wrapped ☐ 05 Unknown ☐ 06 None	
D ☒ 01 Carbon Steel ☐ 02 Stainless Steel ☐ 03 Fiberglass ☐ 04 Polyvinyl Chloride ☐ 05 Concrete ☐ 06 Aluminum	
☐ 07 Steel Clad ☐ 08 Bronze ☐ 09 Composite ☐ 10 Non-metallic ☐ 11 Earthen Walls	
☐ 12 Unknown ☐ 13 Other [illegible]	
E ☐ 01 Rubber Lined ☐ 02 Alkyd Lining ☐ 03 Epoxy Lining ☐ 04 Phenolic Lining ☐ 05 Glass Lining ☐ 06 Clay Lining	
☒ 07 Unlined ☐ 08 Unknown ☐ 09 Other [illegible]	
F ☐ Polyethylene Wrap ☐ 02 Vinyl Wrapping ☐ 03 Cathodic Protection ☐ 04 Unknown ☐ 05 None ☐ 06 Other	

Confidential

VI Piping

A Associated Piping	☒ 01 Above Ground	☐ 02 Underground	☐ 03 Vaulted	
B Underground Piping	☐ 01 Gravity	☐ 02 Pressure	☒ 03 Suction	☐ 04 Unknown
C Piping Repairs	☐ 01 None	☒ 02 Unknown	☐ 03 Yes, Year of most recent repair	_____

VII Leak Detection

☒ 01 Visual ☐ 02 Stock Inventory ☐ 03 Tile Drain ☐ 04 Vapor Sniff Wells ☐ 05 Sensor Instrument

☐ 06 Ground Water Monitoring Wells ☐ 07 Pressure Test ☐ 08 Internal Inspection ☐ 09 None

☐ 10 Other _____

VIII Chemical Composition of Materials *Currently* or *Previously* Stored In Underground Containers

If you checked yes to IV-H you are not required to complete this section

currently stored	previously stored	CAS # (if known)	Chemical *Do Not Use Commercial Name* (Use additional paper for more room)
☒ 01	☐ 02		VARNISH:
☐ 01	☐ 02		MINERAL SPIRITS
☐ 01	☐ 02		XYLENE - SKIN
☐ 01	☐ 02		TOLUENE - SKIN
☐ 01	☐ 02		12% ZIRCONIUM DRIER
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		

Is Container located on an Agricultural Farm? ☐ 01 Yes ☒ 02 No

IX IMPORTANT! Read instructions before signing:

Signature: The form must be signed by 1) a principal executive officer at the level of vice-president or by an authorized representative. The representative must be responsible for the overall operation of the facility where the tank(s) are located 2) a general partner proprietor, or 3) a principal executive officer ranking elected official or authorized representative of a public agency.

This form has been completed under the penalty of perjury and, to the best of my knowledge is true and correct.

Signature	Date
L. C. Weiss	6/29/84

Printed Name	Title	Phone w/ area code
L. C. WEISS	AREA DIRECTOR	(415) 536-2400

Send check to: Hazardous Substance Storage Statement, State Water Resources Control Board, P.O. Box 100, Sacramento, CA 95801-0100

Person Filing Statement	Phone w/ area code
LAURA DEARMOND	(415) 536-2400

For additional forms or more information call 916/324-1262

FOR STATE USE ONLY

ID Number	Accounting Number	County Number

Date Received	☐ 01	☐ 02	☐ 03

Official Registration Form

California Water Resources Control Board

Hazardous Substance Storage Statement

Who Must File: [illegible] hazardous substances in any underground [illegible] after than July 1, 1984 (After October 1, 1987 [illegible] for tanks used on farms)

Definition of Underground Containers. This law applies to concrete [illegible] underground containers (Water Code [illegible]) underground containers including earthen walled pits ponds lagoons [illegible] the normal ground surface level and [illegible] ground is not included. Containers partially beneath the surface are included. Lined or unlined pits ponds and lagoons are considered [illegible] soil has been removed from the storage area to construct the facility. Normal grading is not considered construction below ground level.

Definition of Hazardous Substance: Any substance listed in Section 6382 of the Labor Code or in Section 25316 of the Health and Safety Code. This includes gasoline diesel fuel all industrial solvents pesticides herbicides and fumigants. If the material must be carried by a registered hauler, disposed of at a hazardous waste site is explosive generates pressure due to heat or decomposition or would harm humans or wildlife you must register the tank. Wastes are included.

Fee: For each tank registered a $10 fee must be paid except that retail gasoline stations pay $5 per tank.

Penalties: For failure to file the penalty is $500-$5,000 per day. If you falsify information you can be fined up to $20,000 for each day the information is incorrect and has not been corrected.

Confidentiality: If you have information protected by trade secret laws please attach a list of the information on this form that is confidential and the justification for confidentiality including specific citations of relevant statutory and case law.

Multiple Containers: Fill I and II on one form and leave it blank on all the remaining forms. Attach all forms together securely. If you own more than 50 tanks you can file information on computer tape. Call 916/324-1262 for information.

This is not a Permit Application. All Underground Tanks will be subject to local regulation. Some jurisdictions have already begun programs. Check with your local county government for further information.

NOTE. ALL UNDERGROUND CONTAINERS MUST REGISTER EVEN IF STATE AND/OR LOCAL PERMITS ARE IN FORCE.

I Owner

[illegible] (Owner's Name)
[illegible] Address

[illegible] Address	City	State	ZIP

II Facility

[illegible] Name	Dealer/Foreman/Station No.
[illegible] Address	Nearest Cross Street

City	County	ZIP

[illegible] Address	City	State	ZIP

Phone w/ area code	Type of Business
	☐ 01 Motor Vehicle Fuel Station ☐ 02 Other ____

[illegible] (If Applicable)	Rural Areas Only:	Township	Range	Section

III 24 Hour Emergency Contact Person

[illegible] Name, Title, Phone w/ area code	[illegible] Name (If Same as Item III and Phone w/ area code
ECKMAN, RICHARD (415) 536-2400	ECKMAN, RICHARD (415) 935-3979

COMPLETE THE FOLLOWING ON A SEPARATE FORM FOR EACH CONTAINER

IV Description

Confidential

A ☒ Tank ☐ 02 Sump ☐ 03 Lagoon Pit or Pond ☐ 04 Other ____ **Container Number** (if there is no number assign one) 4

B Manufacturer (if appropriate) — Year of Mfg 1963 C Year Installed 1963 ☐ Unknown

D Container Capacity 2500 gallons ☐ Unknown E. Container Repairs ☒ 01 None ☐ 02 Unknown ☐ 03 Yes Year ____

F Is Container currently used? ☒ 01 Yes ☐ 02 No If No, year of last use ____ ☐ 03 Unknown

G Does the Container Store (Check One) ☐ 01 Waste ☒ 02 Product

H Does the Container Store Motor Vehicle Fuel or Waste Oil? ☐ 01 Yes ☒ 02 No If Yes, Check appropriate box(es)

☐ Unleaded ☐ Regular ☐ Premium ☐ 04 Diesel ☐ 05 Waste Oil ☐ 06 Other (List) ____

V Container Construction

A Thickness of Primary Containment .250 ☐ Gauge ☒ Inches ☐ cm ☐ Unknown

B ☐ Vaulted (Located in an underground Vault) ☒ 02 Non-vaulted ☐ 03 Unknown

C ☐ Double Walled ☒ Single Walled ☐ 03 Lined ☐ Wrapped ☐ 05 Unknown ☐ 06 None

D ☒ Carbon Steel ☐ Stainless Steel ☐ 03 Fiberglass ☐ Polyvinyl Chloride ☐ 05 Concrete ☐ 06 Aluminum

☐ Steel Clad ☐ Bronze ☐ 09 Composite ☐ 10 Non-metallic ☐ Earthen Walls

☐ Unknown ☐ Other ____

E ☐ Rubber Lined ☐ 02 Alkyd Lining ☐ 03 Epoxy Lining ☐ Phenolic Lining ☐ 05 Glass Lining ☐ 06 Clay Lining

☒ Unlined ☐ Unknown ☐ 09 Other ____

F ☐ [illegible] ☐ Vinyl Wrapping ☐ Cathodic Protection ☐ Unknown ☐ None ☒ Other

VI Piping

Confidential

A Associated Piping ☒ 01 Above Ground ☐ 02 Underground ☐ 03 Vaulted

B Underground Piping ☐ 01 Gravity ☐ 02 Pressure ☒ 03 Suction ☐ 04 Unknown

C Piping Repairs ☐ 01 None ☒ 02 Unknown ☐ 03 Yes. Year of most recent repair _____

VII Leak Detection

☒ 01 Visual ☐ 02 Stock Inventory ☐ 03 Tile Drain ☐ 04 Vapor Sniff Wells ☐ 05 Sensor Instrument

☐ 06 Ground Water Monitoring Wells ☐ 07 Pressure Test ☐ 08 Internal Inspection ☐ 09 None

☐ 10 Other. _____

VIII Chemical Composition of Materials *Currently* or *Previously* Stored in Underground Containers

If you checked yes to IV-H you are not required to complete this section

currently stored	previously stored	CAS # (if known)	Chemical *Do Not Use Commercial Name* (Use additional paper for more room)
☒ 01	☐ 02		INDUSTRIAL SOLVENT:
☐ 01	☐ 02		PETROLEUM DISTILLATE
☐ 01	☐ 02		CYCLOHEXANONE
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		

Is Container located on an Agricultural Farm? ☐ 01 Yes ☒ 02 No

IX IMPORTANT! Read instructions before signing

Signature: The form must be signed by 1) a principal executive officer at the level of vice-president or by an authorized representative. The representative must be responsible for the overall operation of the facility where the tank(s) are located 2) a general partner proprietor or 3) a principal executive officer ranking elected official or authorized representative of a public agency

This form has been completed under the penalty of perjury and, to the best of my knowledge, is true and correct

Signature	Date
L.C. Weiss	6/29/94

Typed Name	Title	Phone w/area code
L.C. WEISS	AREA DIRECTOR	(415) 536-2400

Send check to: Hazardous Substance Storage Statement, State Water Resources Control Board, P.O. Box 100 Sacramento, CA 95801-0100

Person Filing Statement	Phone w/area code
LAURA DEARMOND	(415) 536-2400

For additional forms or more information call 916/324-1262

FOR STATE USE ONLY

ID Number	Accounting Number	County Number

Date Received	☐ 01	☐ 02	☐ 03

Official Registration Form

California Water Resources Control Board

Hazardous Substance Storage Statement

pd @ 7BANK
American Co
3801 E. 8th Street
Alameda

Who Must File. [illegible] hazardous substances in any underground [illegible] after January 1, 1984 (After October 1, 1984 for tanks used on farms)

Definition of Underground Containers: This law applies to concrete septic tanks, [illegible] underground containers (Water Code [illegible]) including cellars, walled pits, ponds, lagoons, [illegible] normal ground surface level must register. [illegible] is not included. Containers partially beneath the surface are included if [illegible] pits, ponds and lagoons are excluded if earth has been removed from the storage area to construct the facility. Normal grading is considered construction below ground level.

Definition of Hazardous Substance: Any substance listed in Section 6382 of the Labor Code or in Section 25316 of the Health and Safety Code. This includes gasoline, diesel fuel, all industrial solvents, pesticides, herbicides and fumigants. If the material must be carried by a registered hauler, disposed of at a hazardous waste site, is explosive, generates pressure due to heat or decomposition or would harm humans or wildlife you must register the tank. Wastes are included.

Fee: For each tank registered a $10 fee must be paid except that retail gasoline stations pay $5 per tank.

Penalties: Penalties for late registration are $500-$5,000 per day. If you falsify information, you can be fined up to $20,000 for each day the information is incorrect and has not been corrected.

Confidentiality: If you have information protected by trade secret laws, please attach a list of the information on this form that is confidential and the justification for confidentiality including specific citations of relevant statutory and case law.

Multiple Containers: Fill I and II on one form and leave it blank on all the remaining forms. Attach all forms together securely. If you own more than 50 tanks you can file information on computer tape. Call 916/324-1262 for information.

This is not a Permit Application. All Underground Tanks will be subject to local regulation. Some jurisdictions have already begun programs. Check with your local county government for further information.

NOTE: ALL UNDERGROUND CONTAINERS MUST REGISTER EVEN IF STATE AND/OR LOCAL PERMITS ARE IN FORCE.

I Owner

[illegible]			
[illegible]	City	State	ZIP

II Facility

[illegible]	[illegible]	
[illegible]		Nearest Cross Street
[illegible]	[illegible]	ZIP
[illegible]	City	State / ZIP
[illegible]	Type of Business: ☐ 01 Motor Vehicle Fuel Station ☐ 02 Other [illegible]	
[illegible] Rural Areas Only:	Township	Range / Section

III 24 Hour Emergency Contact Person

[illegible] Phone w/ area code	[illegible] Phone w/ area code
ECKMAN, RICHARD (415) 536-2400	ECKMAN, RICHARD (415) 935-3979

COMPLETE THE FOLLOWING ON A SEPARATE FORM FOR EACH CONTAINER

Confidential

IV Description

A ☒ 01 Tank ☐ 02 Sump ☐ 03 Lagoon Pit or Pond ☐ 04 Other [illegible]	Container Number (if there is no [illegible]) 5
B Manufacturer (if appropriate) — Year of Mfg 1963	C Year Installed 1963 ☐ Unknown
D Container Capacity 6300 gallons ☐ Unknown	E Container Repairs ☒ 01 None ☐ 02 Unknown ☐ 03 Yes Year [illegible]
F Is Container currently used? ☒ 01 Yes ☐ 02 No If No, year of last use [illegible]	☐ 03 Unknown
G Does the Container Store (Check One) ☐ 01 Waste ☒ 02 Product	
H Does the Container Store Motor Vehicle Fuel or Waste Oil? ☐ 01 Yes ☒ 02 No If Yes, Check appropriate box(es)	
☐ Unleaded ☐ 02 Regular ☐ 03 Premium ☐ 04 Diesel ☐ Waste Oil ☐ 06 Other (List) [illegible]	

V Container Construction

A Thickness of Primary Containment .250 ☐ Gauge ☒ Inches ☐ cm ☐ Unknown	
B ☐ Vaulted (Located in an underground Vault) ☒ 02 Non-vaulted ☐ 03 Unknown	
C ☐ 01 Double Walled ☒ Single Walled ☐ 03 Lined ☐ 04 Wrapped ☐ 05 Unknown ☐ 06 None	
D ☒ Carbon Steel ☐ 02 Stainless Steel ☐ 03 Fiberglass ☐ 04 Polyvinyl Chloride ☐ 05 Concrete ☐ 06 Aluminum	
☐ Steel Clad ☐ 08 Bronze ☐ 09 Composite ☐ 10 Non-metallic ☐ 11 Earthen Walls	
☐ Unknown ☐ 99 Other [illegible]	
E ☐ 01 Rubber Lined ☐ 02 Alkyd Lining ☐ 03 Epoxy Lining ☐ 04 Phenolic Lining ☐ 05 Glass Lining ☐ 06 Clay Lining	
☒ 07 Unlined ☐ 08 Unknown ☐ 09 Other [illegible]	
F ☐ [illegible] ☐ Vault Wrapping ☐ 03 Cathodic Protection ☐ [illegible] ☐ None [illegible]	

VI Piping

Confidential

A Associated Piping: [X] 01 Above Ground [ ] 02 Underground [ ] 03 Vaulted

B Underground Piping: [ ] 01 Gravity [ ] 02 Pressure [X] 03 Suction [ ] 04 Unknown

C Piping Repairs: [ ] 01 None [X] 02 Unknown [ ] 03 Yes, Year of most recent repair _____

VII Leak Detection

[X] 01 Visual [ ] 02 Stock Inventory [ ] 03 Tile Drain [ ] 04 Vapor Sniff Wells [ ] Sensor Instrument

[ ] 06 Ground Water Monitoring Wells [ ] 07 Pressure Test [ ] 08 Internal Inspection [ ] 09 None

[ ] 10 Other: _____

VIII Chemical Composition of Materials *Currently* or *Previously* Stored in Underground Containers

If you checked yes to IV-H you are not required to complete this section

currently stored	previously stored	CAS # (If known)	Chemical *Do Not Use Commercial Name* (use additional paper for more room)
[X] 01	[ ] 02		VARNISH:
[ ] 01	[ ] 02		XYLENE
[ ] 01	[ ] 02		AROMATIC HYDROCARBONS
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		

Is Container located on an Agricultural Farm? [ ] 01 Yes [X] 02 No

IX IMPORTANT! Read instructions before signing

Signature: The form must be signed by 1) a principal executive officer at the level of vice-president or by an authorized representative. The representative must be responsible for the overall operation of the facility where the tank(s) are located 2) a general partner proprietor or 3) a principal executive officer, ranking elected official or authorized representative of a public agency.

This form has been completed under the penalty of perjury and to the best of my knowledge is true and correct.

Signature		Date
L.C. Weiss		6/29/94
Printed Name	**Title**	**Phone w/ area code**
L.C. WEISS	AREA DIRECTOR	(415) 536-2400

Send check to: Hazardous Substance Storage Statement, State Water Resources Control Board, P.O. Box 100, Sacramento, CA 95801-0100

Person Filing Statement	Phone w/ area code
LAURA DEARMOND	(415) 536-2400

For additional forms or more information call 916/324-1262

FOR STATE USE ONLY

ID Number	Accounting Number	County Number

Date Received	[ ] 01	[ ] 02	[ ] 03

Official Registration Form

California Water Resources Control Board

Hazardous Substance Storage Statement

Who Must File [illegible]

Definition of Underground Containers: [illegible]

Definition of Hazardous Substance: [illegible] substance listed in Section 6382 of the Labor Code or in Section 25316 of the Health and Safety Code. This includes, gasoline, diesel fuel, all industrial solvents, pesticides, herbicides and fumicants. If the material must be carried by a registered hauler disposed of at a hazardous waste site, is explosive, generates pressure due to heat or decomposition or would harm humans or wildlife you must register

[illegible]

Fee: [illegible]

Penalties: [illegible]

Confidentiality: [illegible] please attach a list of the information on this form that is confidential and the justification for confidentiality, including specific citations to relevant statutory and case law.

Multiple Containers: [illegible] on one form you may leave it blank on all the remaining forms. Attach all forms together securely. If you [illegible] more than 30 tanks you can file information on computer tape. Call 916/324-1262 for information.

This is not a Permit Application. All Underground Tanks will be subject to local regulation. Some jurisdictions have already begun programs. Check with your local county government for further information.

NOTE: ALL UNDERGROUND CONTAINERS MUST REGISTER EVEN IF STATE AND/OR LOCAL PERMITS ARE IN FORCE.

I Owner

[illegible]			
[illegible]	[illegible]	[illegible]	[illegible]

II Facility

[illegible]	[illegible]		
[illegible]	[illegible]		
[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	Type of Business: ☐ [illegible] Motor Vehicle Fuel Station ☐ [illegible] Other [illegible]		
[illegible]	Rural Areas Only: [illegible]	[illegible]	[illegible]

III 24 Hour Emergency Contact Person

[illegible] EORMAN, RICHARD (415) 532-2400	[illegible] EORMAN, RICHARD (415) 925-3979

COMPLETE THE FOLLOWING ON A SEPARATE FORM FOR EACH CONTAINER

IV Description

Confidential

A ☒ Tank ☐ [illegible] Sump ☐ [illegible] Lagoon Pit or Pond ☐ [illegible] Other [illegible] — Container Number [illegible] 6

B Manufacturer (if appropriate) [illegible] Year of Mfg 1963 — C Year Installed 1963 ☐ Unknown

D Container Capacity 4200 Gallons ☐ Unknown — E Container Repairs ☒ [illegible] None ☐ [illegible] Unknown ☐ [illegible] Yes Year [illegible]

F Is Container currently used? ☒ Yes ☐ [illegible] No If No, year of last use [illegible] ☐ [illegible] Unknown

G Does the Container Store (Check One) ☐ [illegible] Waste ☒ [illegible] Product

H Does the Container Store Motor Vehicle Fuel or Waste Oil? ☐ [illegible] Yes ☒ [illegible] No If Yes Check appropriate box(es)

☐ Unleaded ☐ Regular ☐ Premium ☐ [illegible] Diesel ☐ [illegible] Waste Oil ☐ [illegible] Other (List) [illegible]

V Container Construction

A Thickness of Primary Containment .250 ☐ Gauge ☒ Inches ☐ cm ☐ Unknown

B ☐ Vaulted (Located in an underground Vault) ☒ [illegible] Non-vaulted ☐ [illegible] Unknown

C ☐ [illegible] Double Walled ☒ Single Walled ☐ [illegible] Lined ☐ [illegible] Wrapped ☐ [illegible] Unknown ☐ [illegible] None

D ☒ [illegible] Carbon Steel ☐ Stainless Steel ☐ [illegible] Fiberglass ☐ [illegible] Polyvinyl Chloride ☐ [illegible] Concrete ☐ [illegible] Aluminum

☐ Steel Clad ☐ [illegible] Bronze ☐ [illegible] Composite ☐ [illegible] Non-metallic ☐ Earthen Walls

☐ [illegible] Unknown ☐ [illegible] Other [illegible]

E ☐ [illegible] Rubber Lined ☐ [illegible] Alkyd Lining ☐ [illegible] Epoxy Lining ☐ [illegible] Phenolic Lining ☐ [illegible] Glass Lining ☐ [illegible] Clay Lining

☒ Unlined ☐ [illegible] Unknown ☐ [illegible] Other [illegible]

F ☐ [illegible] Vinyl Wrapping ☐ [illegible] Cathodic Protection ☒ [illegible]

VI Piping

Confidential

A Associated Piping: ☒ 1 Above Ground ☐ 2 Underground ☐ 3 Vaulted

B Underground Piping: ☐ 1 Gravity ☐ 2 Pressure ☒ 3 Suction ☐ 4 Unknown

C Piping Repairs: ☐ 1 None ☒ 2 Unknown ☐ 3 Yes, Year of most recent repair _____

VII Leak Detection

☒ 1 Visual ☐ 2 Stock Inventory ☐ 3 Tile Drain ☐ 4 Vapor Sniff Wells ☐ Sensor Instrument

☐ 6 Ground Water Monitoring Wells ☐ 7 Pressure Test ☐ 8 Internal Inspection ☐ 9 None

☐ 10 Other: _____

VIII Chemical Composition of Materials *Currently* or *Previously* Stored in Underground Containers

If you checked yes to IV-H you are not required to complete this section

currently stored	previously stored	CAS # (If known)	Chemical *Do Not Use Commercial Name* (Use additional paper for more room)
☒ 01	☐ 02		INDUSTRIAL SOLVENT:
☐ 01	☐ 02		GLYCOL ETHER
☐ 01	☐ 02		AROMATIC HYDROCARBON
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		

Is Container located on an Agricultural Farm? ☐ 01 Yes ☒ 02 No

IX IMPORTANT! Read instructions before signing

Signature: The form must be signed by 1) a principal executive officer at the level of vice-president or by an authorized representative. The representative must be responsible for the overall operation of the facility where the tank(s) are located 2) a general partner proprietor or 3) a principal executive officer ranking elected official or authorized representative of a public agency.

This form has been completed under the penalty of perjury and, to the best of my knowledge is true and correct.

Signature	Date
L.C. Weiss	6/29/94

Typed Name	Title	Phone w area code
L. C. WEISS	AREA DIRECTOR	(415) 536-2400

Send check to: Hazardous Substance Storage Statement State Water Resources Control Board, P O Box 100, Sacramento, CA 95801-0100

Person Filing Statement	Phone w area code
LAURA DEARMOND	(415) 536-2400

For additional forms or more information call 916/324-1262

FOR STATE USE ONLY

ID Number	Accounting Number	County Number

Date Received	☐ 01	☐ 02	☐ 03

Official Registration Form

California Water Resources Control Board

Hazardous Substance Storage Statement

Who Must File [illegible] hazardous substances in any underground [illegible] on July 1, 1984 (After October [illegible] for tanks used on farms)

Definition of Underground Containers: For this statute, to [illegible] underground pipelines (NOT for [illegible] including [illegible] oil ponds [illegible] the normal ground level [illegible] on the property is not included. Containers partially [illegible] included. Pits of drilled oil, ponds and lagoons [illegible] has been removed from the storage area to construct [illegible] grade, [illegible] construction below ground [illegible]

Definition of Hazardous Substance: Any substance listed in Section 6382 of the Labor Code or in Section 25316 of the Health and Safety Code. This includes gasoline, diesel fuel, all industrial solvents, pesticides, herbicides and fumigants. If the material must be carried by a registered hauler, disposed of at a hazardous waste site, is explosive, generates pressure due to heat or decomposition or would harm humans or wildlife you must register the tank. Wastes are not exempt.

Fee: For [illegible] tank registered at $10 fee must be paid, except that retail gasoline stations pay $5 per tank.

Penalties: For failure to [illegible] penalty is $500 - $5,000 per day. If you falsify information you can be fined up to $20,000 for each day the information is incorrect and has not been corrected.

Confidentiality: If you have information protected by trade secret laws, please attach a list of the information on this form that is confidential and the justification for confidentiality, including specific citations of relevant statutory and case law.

Multiple Containers: Fill I and II on one form and leave it blank on all the remaining forms. Attach all forms together securely. If you own more than 50 tanks you can file information on computer tape. Call 916/324-1262 for information.

This is not a Permit Application. All Underground Tanks will be subject to local regulation. Some jurisdictions have already begun programs. Check with your local county government for further information.

NOTE: ALL UNDERGROUND CONTAINERS MUST REGISTER EVEN IF STATE AND/OR LOCAL PERMITS ARE IN FORCE.

I Owner

[illegible] Owner or Public Agency			
Street Address	City	State	ZIP

II Facility

[illegible]	Closest Intersection Street
[illegible]	Nearest Cross Street
[illegible]	City / ZIP
[illegible]	City / State / ZIP
[illegible]	Type of Business: ☐ 01 Motor Vehicle Fuel Station ☐ 00 Other, [illegible]

[illegible]	Rural Areas Only:	Township	Range	Section

III 24 Hour Emergency Contact Person

[illegible] area code	[illegible] area code
ECKMAN, RICHARD (415) 536-2400	ECKMAN, RICHARD (415) 935-3979

COMPLETE THE FOLLOWING ON A SEPARATE FORM FOR EACH CONTAINER

IV Description

A [X] Tank ☐ 02 Sump ☐ 03 Lagoon, Pit or Pond ☐ 04 Other _____ — **Container Number** (if there is no number, assign one): 7

B Manufacturer (if appropriate) — Year of Mfg 1963 — C Year Installed 1963 ☐ Unknown

D Container Capacity 12000 gallons ☐ Unknown — E Container Repairs [X] 01 None ☐ 02 Unknown ☐ 03 Yes Year, _____

F Is Container currently used? [X] 01 Yes ☐ 02 No If No, year of last use _____ ☐ 03 Unknown

G Does the Container Store (Check One) ☐ 01 Waste [X] 02 Product

H Does the Container Store Motor Vehicle Fuel or Waste Oil? ☐ 01 Yes [X] 02 No If Yes, Check appropriate box(es)

☐ Unleaded ☐ 02 Regular ☐ 03 Premium ☐ 04 Diesel ☐ 05 Waste Oil ☐ 06 Other (List): _____

V Container Construction

A Thickness of Primary Containment .250 ☐ Gauge [X] Inches ☐ cm ☐ Unknown

B ☐ 01 Vaulted (Located in an underground Vault) [X] 02 Non-vaulted ☐ 03 Unknown

C ☐ 01 Double Walled [X] 02 Single Walled ☐ 03 Lined ☐ 04 Wrapped ☐ 05 Unknown ☐ 06 None

D [X] 01 Carbon Steel ☐ 02 Stainless Steel ☐ 03 Fiberglass ☐ 04 Polyvinyl Chloride ☐ 05 Concrete ☐ 06 Aluminum

☐ 07 Steel Clad ☐ 08 Bronze ☐ 09 Composite ☐ 10 Non-metallic ☐ 11 Earthen Walls

☐ 12 Unknown ☐ 00 Other _____

E ☐ 01 Rubber Lined ☐ 02 Alkyd Lining ☐ 03 Epoxy Lining ☐ 04 Phenolic Lining ☐ 05 Glass Lining ☐ 06 Clay Lining

[X] 07 Unlined ☐ 08 Unknown ☐ 00 Other _____

F ☐ [illegible] ☐ Vinyl Wrapping ☐ 03 Cathodic [illegible] [X] 04 None ☐ 05 Unknown

VI Piping

A Associated Piping	[X] Above Ground	[ ] Underground	[ ] Various	
B Underground Piping	[ ] 01 Gravity	[ ] 02 Pressure	[X] 03 Suction	[ ] 04 Unknown
C Piping Repairs	[ ] 01 None	[X] 02 Unknown	[ ] 03 Yes Year of most recent repair	

VII Leak Detection

[X] 01 Visual [ ] 02 Stock Inventory [ ] 03 Tile Drain [ ] 04 Vapor Sniff Wells [ ] Sensor Instrument

[ ] 06 Ground Water Monitoring Wells [ ] 07 Pressure Test [ ] 08 Internal Inspection [ ] 09 None

[ ] 10 Other: _____

VIII Chemical Composition of Materials *Currently* or *Previously* Stored in Underground Containers

If you checked yes to IV-H you are not required to complete this section

currently stored	previously stored	CAS # (If known)	Chemical *Do Not Use Commercial Name* (Use additional paper for more room)
[X] 01	[ ] 02		GRADE No 2 FUEL OIL
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		
[ ] 01	[ ] 02		

Is Container located on an Agricultural Farm? [ ] 01 Yes [X] No

IX IMPORTANT! Read instructions before signing

Signature: The form must be signed by 1) a principal executive officer at the level of vice-president or by an authorized representative The representative must be responsible for the overall operation of the facility where the tank(s) are located 2) a general partner proprietor or 3) a principal executive officer, ranking elected official or authorized representative of a public agency

This form has been completed under the penalty of perjury and to the best of my knowledge is true and correct

Signature	Date
L C Weiss	6/29/84

Typed Name	Title	Phone w/ area code
L. C. WEISS	AREA DIRECTOR	(415) 536-2400

Send check to: Hazardous Substance Storage Statement, State Water Resources Control Board P.O Box 100, Sacramento CA 95801-0100

Person Filing Statement	Phone w/ area code
LAURA DEARMOND	(415) 536-2400

For additional forms or more information call 916/324-1262

FOR STATE USE ONLY

ID Number	Accounting Number	County Number

Date Received	[ ] 01	[ ] 02	[ ] 03

Official Registration Form

California Water Resources Control Board

Hazardous Substance Storage Statement

Who Must File [illegible] hazardous substances in any underground [illegible] on or after July 1, 1984. After October [illegible] for tanks used on farms.

Definition of Underground Containers This law applies to concrete [illegible] underground containers. Above ground containers including farmers walled pits, ponds [illegible] are not subject to this law. Normal ground surface level must be used. Any [illegible] is not included. Containers partially below the surface are subject to this law. Lined or unlined pits, ponds and lagoons are covered if earth has been removed from the storage area to construct the facility. Normal grading is not considered construction below ground level.

Definition of Hazardous Substance: Any substance listed in Section 6382 of the Labor Code or in Section 25316 of the Health and Safety Code. This includes gasoline, diesel fuel, all industrial solvents, pesticides, herbicides and fumigants. If the material must be carried by a registered hauler, disposed of at a hazardous waste site, is explosive, generates pressure due to heat or decomposition or would harm humans or wildlife you must register [illegible] Tank Wastes are [illegible]

Fee: For [illegible] must be paid [illegible] that retail [illegible] stations only, $0 per [illegible]

Penalties: [illegible] penalty is $500-$5,000 per day if you falsify [illegible] you can be fined [illegible] $20,000 for each day the information is [illegible] and has not been [illegible]

Confidentiality: If you have information protected by trade secret laws please attach a list of this information on this form that is confidential and the justification for confidentiality, including specific citations of relevant statutory and case law.

Multiple Containers: Fill I and II on one form and leave it blank on all the remaining forms. Attach all forms together securely. If you own more than 50 tanks you can file information on computer tape. Call 916/324-1262 for information.

This is not a Permit Application. All Underground Tanks will be subject to local regulation. Some jurisdictions have already begun programs. Check with your local county government for further information.

NOTE: ALL UNDERGROUND CONTAINERS MUST REGISTER EVEN IF STATE AND/OR LOCAL PERMITS ARE IN FORCE.

I Owner

[illegible] Owner's Name (Individual or Company)			
[illegible] Address	City	State	ZIP

II Facility

[illegible] Name	[illegible] Farmer, Supervisor	
[illegible] Address	Nearest Cross Street	
[illegible]	County	ZIP
[illegible] Address	City	State / ZIP
[illegible] Area Code	Type of Business: ☐ 01 Motor Vehicle Fuel Station ☐ 02 Other _____	
[illegible] Geographical Facility	Rural Areas Only: Township	Range / Section

III 24 Hour Emergency Contact Person

[illegible] Name & Area Code	[illegible] Name & Area Code
ECKMAN, RICHARD (415)536-2400	ECKMAN, RICHARD (415)935-3979

COMPLETE THE FOLLOWING ON A SEPARATE FORM FOR EACH CONTAINER

Confidential

IV Description

A [X] 01 Tank ☐ 02 Sump ☐ 03 Lagoon, Pit or Pond ☐ 04 Other _____ — Container Number (if there is no number, assign one): 8

B Manufacturer (if appropriate) — Year of Mfg. 1963 — C Year Installed 1963 ☐ Unknown

D Container Capacity 6000 gallons ☐ Unknown — E Container Repairs [X] 01 None ☐ 02 Unknown ☐ 03 Yes Year. _____

F Is Container currently used? [X] 01 Yes ☐ 02 No If No, year of last use. _____ ☐ 03 Unknown

G Does the Container Store (Check One) ☐ 01 Waste [X] 02 Product

H Does the Container Store Motor Vehicle Fuel or Waste Oil? ☐ 01 Yes [X] 02 No If Yes, Check appropriate box(es)

☐ 01 Unleaded ☐ 02 Regular ☐ 03 Premium ☐ 04 Diesel ☐ 05 Waste Oil ☐ 06 Other (List) _____

V Container Construction

A Thickness of Primary Containment .250 ☐ Gauge [X] Inches ☐ cm ☐ Unknown

B ☐ 01 Vaulted (Located in an underground Vault) [X] 02 Non-vaulted ☐ 03 Unknown

C ☐ 01 Double Walled [X] 02 Single Walled ☐ 03 Lined ☐ 04 Wrapped ☐ 05 Unknown ☐ 06 None

D [X] 01 Carbon Steel ☐ 02 Stainless Steel ☐ 03 Fiberglass ☐ 04 Polyvinyl Chloride ☐ 05 Concrete ☐ 06 Aluminum

☐ 07 Steel Clad ☐ 08 Bronze ☐ 09 Composite ☐ 10 Non-metallic ☐ 11 Earthen Walls

☐ 12 Unknown ☐ 13 Other _____

E ☐ 01 Rubber Lined ☐ 02 Alkyd Lining ☐ 03 Epoxy Lining ☐ 04 Phenolic Lining ☐ 05 Glass Lining ☐ 06 Clay Lining

[X] 07 Unlined ☐ 08 Unknown ☐ 09 Other _____

F ☐ [illegible] ☐ [illegible] Wrapping ☐ 03 Cathodic [illegible] ☐ [illegible] [X] [illegible]

VI Piping

Confidential

A Associated Piping	☒ 01 Above Ground	☐ 02 Underground	☐ 03 Vaulted	
B Underground Piping	☐ 01 Gravity	☐ 02 Pressure	☒ 03 Suction	☐ 04 Unknown
C Piping Repairs	☐ 01 None	☒ 02 Unknown	☐ 03 Yes, Year of most recent repair	

VII Leak Detection

☒ 01 Visual ☐ 02 Stock Inventory ☐ 03 Tile Drain ☐ 04 Vapor Sniff Wells ☐ 05 Sensor Instrument

☐ 06 Ground Water Monitoring Wells ☐ 07 Pressure Test ☐ 08 Internal Inspection ☐ 09 None

☐ 10 Other

VIII Chemical Composition of Materials *Currently* or *Previously* Stored In Underground Containers

If you checked yes to IV-H you are not required to complete this section

currently stored	previously stored	CAS # (If known)	Chemical *Do Not Use Commercial Name* (Use additional paper for more room)
☒ 01	☐ 02		VINYL:
☐ 01	☐ 02		METHYL ETHYL KETONE
☐ 01	☐ 02		LACTOL SPIRITS
☐ 01	☐ 02		2-NITRO PROPANE
☐ 01	☐ 02		TOLUENE
☐ 01	☐ 02		DIMETHYL KETONE
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		
☐ 01	☐ 02		

Is Container located on an Agricultural Farm? ☐ 01 Yes ☒ 02 No

IX IMPORTANT! Read instructions before signing.

Signature: The form must be signed by 1) a principal executive officer at the level of vice-president or by an authorized representative. The representative must be responsible for the overall operation of the facility where the tank(s) are located 2) a general partner proprietor or 3) a principal executive officer ranking elected official or authorized representative of a public agency.

This form has been completed under the penalty of perjury and to the best of my knowledge is true and correct.

Signature		Date
L.C. Weiss		6/29/84
Typed Name	**Title**	**Phone w/ area code**
L.C. WEISS	AREA DIRECTOR	(415) 536-2400

Send check to: Hazardous Substance Storage Statement, State Water Resources Control Board P.O. Box 100 Sacramento CA 95801-0100

Person Filing Statement	Phone w/ area code
LAURA DEARMOND	(415) 536-2400

For additional forms or more information call 916/324-1262

FOR STATE USE ONLY

ID Number	Accounting Number	County Number

Date Received	☐ 01	☐ 02	☐ 03