

LOP - CHANGE RECORD REQUEST FORM

printed:
11/10/98

Mark Out What Needs Changing and Hand to LOP Data Entry
(Name/Address changes go to Annual Programs Data Entry)

Insp:

AGENCY # : 10000 SOURCE OF FUNDS: F SUBSTANCE: 8006619
 StID : 3604 LOC: -0-
 SITE NAME: C M M & Pacific Int'l Steel DATE REPORTED : 02/01/87
 ADDRESS : 16525 Worthley Dr DATE CONFIRMED: 02/01/87
 CITY/ZIP : San Lorenzo 94580 MULTIPLE RPs : Y

SITE STATUS

CASE TYPE: O CONTRACT STATUS: 7 PRIOR CODE:1C3 EMERGENCY RESP: -0-
 RP SEARCH: S DATE COMPLETED: 12/26/91
 PRELIMINARY ASMNT: C DATE UNDERWAY: 06/24/87 DATE COMPLETED: 06/14/96
 REM INVESTIGATION: C DATE UNDERWAY: 05/04/90 DATE COMPLETED: 12/01/93
 REMEDIAL ACTION: C DATE UNDERWAY: 08/01/90 DATE COMPLETED: 07/30/96
 POST REMED ACT MON:C DATE UNDERWAY: 12/04/90 DATE COMPLETED: 04/24/96

ENFORCEMENT ACTION TYPE: 1 DATE ENFORCEMENT ACTION TAKEN: 12/26/91
 LUFT FIELD MANUAL CONSID: 3HSCARWG
 CASE CLOSED: Y DATE CASE CLOSED: 11/17/98
 DATE EXCAVATION STARTED : 12/01/88 REMEDIAL ACTIONS TAKEN: ED,GT

RESPONSIBLE PARTY INFORMATION

RP#1-CONTACT NAME: Richard Ernest
 COMPANY NAME: Crown Metal Mrg. Co. Inc.
 ADDRESS: 765 South State Route 83
 CITY/STATE: Elmhurst IL 60126-4700

RP#2-CONTACT NAME: Elise Varon
 COMPANY NAME: n/a
 ADDRESS: 765 S. Route 83
 CITY/STATE: Elmhurst, Illinois 60126

RP#3-CONTACT NAME: Attn: Anthony Varni
 COMPANY NAME: Cosmas, Ltd., A Calif. Corp.
 ADDRESS: 14 Mirada Road
 CITY/STATE: Half Moon Bay, Ca 94019

INSPECTOR VERIFICATION:

NAME _____ SIGNATURE _____ DATE _____

DATA ENTRY INPUT:

Name/Address Changes Only			Case Progress Changes	
ANNPGMS _____	LOP _____	DATE _____	LOP _____	DATE _____

LOP - CHANGE RECORD REQUEST FORM

printed:
10/19/98

Mark Out What Needs Changing and Hand to LOP Data Entry
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RESPONSIBLE PARTY INFORMATION

RP#1-CONTACT NAME: Richard Ernest
 COMPANY NAME: Crown Metal Mrg. Co. Inc.
 ADDRESS: 765 South State Route 83
 CITY/STATE: Elmhurst IL 60126-4700

RP#2-CONTACT NAME: Elise Varon
 COMPANY NAME: n/a
 ADDRESS: 765 S. Route 83
 CITY/STATE: Elmhurst, Illinois 60126

RP#3-CONTACT NAME: Attn: Anthony Varni
 COMPANY NAME: Cosmas, Ltd., A Calif. Corp.
 ADDRESS: 14 Mirada Road
 CITY/STATE: Half Moon Bay, Ca 94019

INSPECTOR VERIFICATION:

NAME _____	SIGNATURE _____	DATE _____
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ANPPGMS _____	LOP _____	DATE _____	LOP _____	DATE _____

*Answer - ready for closure -
 Can you do? J. Franks*

*Alameda County Health Care Services Agency
Department of Environmental Health*



Permit

*This is to certify that _____,
doing business as _____, is permitted
to operate a _____
at _____.*

This permit is not transferable and is good until

Issued this _____ day of _____, 19 _____.

Specialist
By Authority of
Director of Environmental Health

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

August 25, 1997

STID#: 3604

Mr. Gary King
Project Coordinator
5157 Brophy Drive
Fremont, CA 94536

**Subject: Proposed Workplan for Destruction of Existing
Monitoring Wells on Site Located at 16525 Worthley
Drive, San Lorenzo, CA 94580**

Dear Mr. King:

This office has received and reviewed the aforementioned workplan, submitted by Epigene Geologists, your consultant of record, for destruction of the monitoring wells located at the above site. Thank you for the prompt attention given the requests of this office.

Following review of the document, this office concurs with the workplan as submitted. You may implement the workplan immediately. Upon completion of the tasks as outlined in the plan, a closure letter will be sent to you, barring any unforeseen problems.

Please give this office forty-eight (48) hours notice **prior** to commencing any work at the site. If you have any questions please call this office. The telephone number is (510) 567-6737.

Sincerely,

Brian P. Oliva, REHS, REA
Hazardous Materials Specialist

c. Epigene International, 38750 Paseo Padre Parkway, Suite A-11,
Fremont, CA 94536

BC

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

StId 3604/lop
March 10, 1997

Attn: Anthony Varni
Cosmas, Ltd., A California Corp.
14 Mirada Rd.
Half Moon Bay CA 94019

Attn: Richard Ernest
Crown Metal Manuf. Co., Inc.
765 South State Route 83
Elmhurst IL 60126-4700

Elise Varon
765 S Route 83
Elmhurst IL 60126

Subject: Well destruction request for Crown Metal Manufacturing and Pacific International Steel located at 16525 Worthley Dr., San Lorenzo CA 94580

The Alameda County Department of Environmental Health, Environmental Protection Division and the San Francisco Regional Water Quality Control Board have reviewed the case closure summary for the above referenced site and concur that no further action related to the release(s) from the former underground storage tanks is required at this time.

Please be advised that if there are no plans to continue groundwater monitoring, the eight (8) groundwater monitoring wells (designated as MW-1, MW-2, MW-4, MW-5, MW-6, MW-7, MW-8, and RW-1) at the site must be properly decommissioned before our agency will issue the **Remedial Action Completion Certification** (closure letter). A report must be submitted to this office documenting the abandonment of the monitoring wells or a letter stating your intentions to continue groundwater monitoring at the site.

Well destruction permits may be obtained from Alameda County Flood Control and Water Conservation, Zone 7. Their telephone number is (510)484-2600. Additionally, you will need to notify this office 72 hours in advance of the well abandonment field activities.

Please call me at (510)567-6755 if you have questions.

Sincerely,

Amy Leech
Hazardous Materials Specialist

c: Kevin Graves, RWQCB
Cheryl Gordon, SWRQB
ALL/File

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

Epigene International

38750 Paseo Padre Parkway, Suite A-11
Fremont, CA 94536
Phone: 510-791-1986
Fax: 510-791-3306

FAX

Date: 6/10/96
To: Ms. Amy heech
Alameda Co. Dept. of Environmental
From: John Alt Health
Number of Pages (Including Cover): 1
Subject: 16525 Worthy Dr.
San Lorenzo, Alameda County

Notes:

Plan to do hydroponics at
subject site on Friday, June 14
beginning at ~ 8:00 AM

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

Alameda County CC4580
Environmental Health Services
1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
(510)567-6700 FAX(510)337-9335

StId 3604

June 3, 1996

Attn: Anthony Varni
COSMAS, Ltd., A California Corp.
14 Mirada Rd
Half Moon Bay CA 94019

Subject: Investigations at 16525 Worthley Drive, San Lorenzo, CA

Dear Mr. Varni:

This office has reviewed Epigene International's work plan, dated May 17, 1996. This work plan proposes to complete a soil and groundwater investigation downgradient of the former underground storage tank (UST) pit at the subject site using direct push technology. This work plan is acceptable to this office with the following comments/additions:

1. Soil samples must be collected every five feet, at changes in lithology, and at the soil-groundwater interface. Laboratory analyses should be performed on soil samples where contamination is suspected and the sample collected from the soil-groundwater interface. Include the logs of all soil borings in the final report.
2. In addition to Total Petroleum Hydrocarbons as gasoline (TPHg) and BTEX, soil and groundwater samples must also be analyzed for Methyl Tertiary Butyl Ether (MTBE). MTBE can be quantified using EPA method 8020.

Please notify this office at least 72 hours before field work begins. Field work should commence within the next 30 days. A report must be submitted within 45 days after the completion of this phase of work at the site. If you have questions, please call me at (510)567-6755.

Sincerely,

Amy Leech
Hazardous Materials Specialist

c: John Alt, Epigene International, 38750 Paseo Padre Parkway, Suite A-11, Fremont, CA 94536
Gary King, Tri-City Properties, 5157 Brophy Dr., Fremont CA 94536
Gordon Coleman-File(ALL)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Alameda County CC4580
Environmental Health Services
1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
(510)567-6700 FAX(510)337-9335

StId 3604

May 9, 1996

Attn: Anthony Varni
COSMAS, Ltd., a California Corp.
14 Mirada Rd
Half Moon Bay CA 94019

Subject: Investigations at 16525 Worthley Drive, San Lorenzo, CA

Dear Mr. Varni:

This office has reviewed a letter from Gary King, dated May 2, 1996, and the First Quarter 1996 Monitoring Report, dated April 29, 1996, for the subject site. Mr. King requested that this office consider the subject site for closure. As stated in our March 29, 1996 letter (see attached), the extent of groundwater contamination emanating from the former tank pit downgradient and toward the surface water canal must be evaluated to confirm that there is no impact to the surface water canal. Per the San Francisco Bay Regional Water Quality Control Board's Interim Guidance on Required Cleanup at Low Risk Fuel Site, dated January 5, 1996, in order to consider this site as a low risk groundwater case, investigations must confirm that the plume is stable in the downgradient direction and that sensitive receptors (e.g., the surface water canal) are not impacted.

Please submit to this office no later than May 28, 1996, a work plan or work plan addendum as outlined in the March 29, 1996, letter. Please contact me at (510)567-6755 if you have questions or comments.

Sincerely,

Amy Leech
Hazardous Materials Specialist

ATTACHMENT

c: Mr. Gary King, Tri-City Properties, 5157 Brophy Dr., Fremont CA 94536 w/attachment
Gordon Coleman-File(ALL)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

StId 3604

March 29, 1996

Attn: Anthony Varni
COSMAS, Ltd., a California Corp.
14 Mirada Rd
Half Moon Bay CA 94019

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

Subject: Investigations at 16525 Worthley Drive, San Lorenzo, CA

Dear Mr. Varni:

This office requested in our letter dated August 7, 1995, that you submit an addendum to Lowney Associates' work plan dated January 6, 1995 to include the installation of at least one permanent monitoring well located downgradient (south to southwest) from monitoring well RW-1 at the subject site. This well was to further characterize the extent of groundwater contamination emanating from the site toward the surface water canal located downgradient from the former tank pit. Mr. Gary King met with me on December 15, 1995, to request if an investigation using hydropunch technology would be acceptable in lieu of a permanent monitoring well.

I discussed the merit of a hydropunch investigation versus a permanent monitoring well in regard to this site with Kevin Graves, Associate Water Resources Control Engineer with the San Francisco Bay Regional Water Quality Control Board (SFRWQCB), on February 13, 1996. It was Mr. Graves opinion that the installation of properly placed permanent monitoring well(s) located in the downgradient direction (i.e., south to southwest) of the former tank pit would provide the data necessary to determine whether the contaminant plume is stable and if petroleum hydrocarbons emanating from the site are significantly impacting the surface water canal.

However, he concurred that your proposal of a hydropunch investigation or placement of temporary wells downgradient from the former tank pit could provide useful preliminary data. Upon receipt and evaluation of the data derived from the hydropunch or temporary well investigation, a determination would be made regarding the need for and proper placement of permanent groundwater monitoring well(s) downgradient from the former tank pit.

Please submit to this office within 30 days, or by April 30, 1996, a work plan or an addendum to Lowney Associates' work plan dated January 6, 1995, that proposes to complete a groundwater investigation south to southwest of the former tank pit by either: 1) installation of a permanent monitoring well or 2) completion of a preliminary groundwater investigation via the installation of at least two sample locations using direct push technology or installation of temporary wells.

Please be aware that quarterly reports for this site have not been submitted to this office since September 1995 for the third quarter of 1995. Failure to collect groundwater monitoring data undermines efforts to accurately delineate the direction and extent of contaminant migration at your site. **In addition to the work plan, please submit the quarterly reports for fourth quarter 1995 and first quarter 1996 by April 30, 1996.**

Varni

Re: 16525 Worthley Dr.

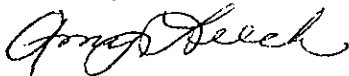
March 29, 1996

Page 2 of 2

As I discussed with Mr. King on December 15, 1995, based on the findings of the groundwater investigation downgradient of the former tank pit, this site may be eligible to apply for case closure. For your reference, please find enclosed the SFRWQCB's "Interim Guidance on Required Cleanup at Low Risk Fuel Sites". This site will need to meet the six point definition of a "Low Risk Groundwater Case" in order to qualify for closure.

Please contact me at (510)567-6755 if you have questions or comments.

Sincerely,



Amy Leech

Hazardous Materials Specialist

ATTACHMENT



c: Mr. Gary King, Tri-City Properties, 5157 Brophy Dr., Fremont CA 94536 *w/attachment*
Gordon Coleman-File(ALL)

COSMAS, LTD.
14 MIRADA ROAD
HALF MOON BAY, CALIFORNIA 94019

December 18, 1995

Alameda County Department of
Environmental Health
Environmental Protection Division
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Attention: Amy Leech

Re: 16525 Worthley Drive
San Lorenzo, CA

Dear Ms. Leech:

I would like to take this opportunity to thank you for the courtesy and cooperation extended to Mr. Gary King, my project coordinator with regard to the Worthley Drive, San Lorenzo, property and its environmental issues.

We look forward to hearing from you at your convenience as to possible closure after you have had time to look into the recommendations and proposals of the State Water Resources Control Board.

Again, thank you for your time and courtesies.

Very truly yours,

COSMAS, LTD.

By

ANTHONY B. VARNI

ABV;jes
cc--Mr. Gary King,

5157 Brophy DR
Fremont 94536

Environmental Protection
95 DEC 21 PM 2:28

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Director

StId 3604

August 7, 1995

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

Attn: Anthony Varni
COSMAS, Ltd., a California Corp.
14 Mirada Rd
Half Moon Bay CA 94019

Subject: Investigations at 16525 Worthley Drive, San Lorenzo, CA

Dear Mr. Varni:

This office is in receipt of a letter from your consultant, Lowney Associates, dated June 6, 1995. In this letter Lowney Associates proposes to alter their workplan, dated January 6, 1995, for the subject site. This office had approved that workplan with conditions on January 26, 1995.

The letter dated June 6th proposes that one monitoring well be installed downgradient of the former underground storage tank (UST) pit or two "grab" groundwater samples be collected downgradient from the UST pit via the installation of two hydropunches. After a review of this case and a telephone conference with Stason Foster of Lowney Associates on August 1, 1995, this office requests the following:

1. Quarterly reports for this site have not been submitted to this office since September 1994 for the second quarter of 1994. Please be aware that failure to collect groundwater monitoring data undermines efforts to accurately delineate the direction and extent of contaminant migration at your site.

Per California Code of Regulations, Title 23, Division 3, Chapter 16, Article 5, and guidelines established by the California Regional Water Quality Control Board (RWQCB), ground water samples are to be collected and analyzed quarterly, including water level measurements and elevation contours. A report of each quarterly monitoring event is due to this office the first day of the second month of each subsequent quarter until this site qualifies for final RWQCB "sign-off".

Please begin quarterly monitoring at the site within 15 days and submit the first report to this office by September 7, 1995.

Varni

Re: 16525 Worthley Dr.

August 7, 1995

Page 2 of 3

2. As indicated in previous correspondence and per my conversation with Mr. Foster on August 1st, you are planning to request that this site be considered a Non-Attainment Area (NAA). Before a site can apply for NAA, the extent of petroleum contamination in groundwater must be adequately delineated in all directions. In regard to this site, the plume boundaries have not been adequately defined in the downgradient directions from southwest to southeast. Permanent groundwater monitoring wells will need to be placed at perimeter locations southwest to southeast of monitoring well RW-1 to establish the limits of groundwater contamination.

Based on 1994 groundwater monitoring data for monitoring well MW-2, MW-2 could serve as a southeast perimeter well as long as benzene levels remain below two (2) parts per billion. More recent groundwater monitoring data will hopefully provide data to assist in determining if this well could be considered as an appropriate perimeter well. Should elevated levels of groundwater contamination be detected at monitoring MW-2, then a groundwater investigation south of MW-2 will be required.

A groundwater investigation is required southwest of monitoring RW-1. This investigation must include the installation of a permanent "perimeter" monitoring well to define the limits of groundwater contamination emanating southwest from this site.

Please submit an addendum to the workplan dated January 6, 1995 that includes analysis of recent groundwater monitoring data for the site and the revised plans for delineating the extent of groundwater contamination downgradient of monitoring well RW-1. **The addendum is due to this office no later than September 7, 1995.**

Mr. Foster indicated that you were interested in knowing when/how you could reduce the sampling frequency for monitoring wells from quarterly to a less frequent schedule at this site. Please be aware that this office approved the suspension of sampling of monitoring wells MW-1, MW-4, MW-5, MW-6, MW-7 in March of 1991 and a reduction of sampling of MW-8 to an annual event beginning in May 1992. Monitoring wells RW-1 and MW-2 must be sampled on a quarterly basis, as specified above, due to the need to monitor for the presence and concentrations of groundwater contamination in these areas.

Varni
Re: 16525 Worthley Dr.
August 7, 1995
Page 3 of 3

For your review, I have attached a copy of the most recent draft copy of the San Francisco Bay Regional Water Quality Control Board's memorandum for Implementing a Ground Water Non-Attainment Area. This policy has not yet been approved by the State; however, it is being implemented on a case-by-case basis in Alameda County. A Groundwater Management Plan must be developed and proposed as part of the NAA request process. After downgradient monitoring wells have been installed to establish the perimeter of the contaminant plume boundaries to the southwest and southeast, a reduction in sampling frequency, if appropriate, could be proposed in the Groundwater Management Plan for this site.

Please contact me at (510)567-6755 if you have questions or comments. We look forward to receiving the next quarterly report and workplan addendum by September 7th.

Sincerely,



Amy Leech
Hazardous Materials Specialist

ATTACHMENT

c: Stason Foster w/attachment
Lowney Associates
405 Clyde Ave
Mountain View CA 94043-2209

Acting Chief of Environmental Protection-File(ALL)

Received on 7/31/95

LOWNEY ASSOCIATES
Environmental / Geotechnical / Engineering Services

June 6, 1995
719-3A, MV030105

95 JUN -8 PM 12:17
ENVIRONMENTAL
REGISTRATION

Ms. Amy Leech
ALAMEDA COUNTY HEALTH CARE SERVICES
Department Of Environmental Health
1131 Harbor Bay Parkway, Room 250
Alameda, California 94502-6577

**RE: 16525 WORTHLY DRIVE
SAN LORENZO, CALIFORNIA**

Dear Ms. Leech:

Thank you for your letter dated January 26, 1995. After review of previously measured ground water flow directions at the site, it appears, as you indicated, that some fluctuation in flow directions has occurred. However, a generally southerly flow appears to be predominant. Due to the low permeability of the water bearing zone and flat gradients typical of the site area, the ground water contaminant plume would be expected to be slow moving and exhibit a good deal of lateral dispersion. Thus, the installation of two down-gradient wells located only an short distance apart does not appear warranted. In our opinion, a single well would be sufficient to evaluate down-gradient plum boundaries.

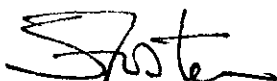
As an alternative to the installation of wells off-site on County property, we would like to suggest the collection of hydropunch ground water samples from two down-gradient locations. If clean, these samples would indicate that impacted ground water has not significantly migrated beyond the property boundaries and subsequent quarterly sampling of the existing on-site wells would aid in monitoring the natural degradation of the petroleum hydrocarbons present.

In regards to your request for a previous report documenting the underground gasoline storage tank removals, we have made exhaustive attempts to locate such a report. The previous site occupants/owners including Crown Metals Manufacturing and Pacific International Steel as well as the previous consultants that were involved with the project have been contacted. However, all attempts at locating or even confirming the existence of such a report have been unsuccessful. Thus, it does not appear that the tank removal work was well documented.

If you have any questions, please call.

Very truly yours,

LOWNEY ASSOCIATES



Stason I. Foster, P.E.
Associate
Environmental Engineer

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

January 26, 1995

ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIVISION
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

COSMAS, LTD.
14 Mirada Road
Half Moon Bay, CA 94019

STID 3604

Subject: Work plan for investigations at 16525 Worthley Drive,
San Lorenzo, California

Dear Mr. Varni:

This office has reviewed Lowney Associates' (Lowney) work plan, dated January 6, 1995. This work plan is acceptable to this office provided that the following items are addressed and/or included:

- o One monitoring well located south of MW-2 was proposed in the plan. Historical ground water gradient data of this site has shown that the gradient fluctuates south to southeast and south to southwest. The proposed monitoring well south of MW-2 would assist in delineating the contamination to the southeast but not to the southwest. We recommend you consider installing an additional monitoring well south to southwest of the excavation area to assist in delineating the extent of contamination.
- o Well drilling permits should be secured through the Alameda County Flood Control and Water Conservation District, Zone 7, in Pleasanton. An encroachment permit would be obtained through Alameda County Public Works, 399 Elmhurst St., Hayward 94544. The contact for an encroachment permit is John Rogers (510)670-5429.
- o Screen placement for the monitoring wells should accommodate seasonal fluctuations of the water table. In addition, site specific data has shown that, on average, the water table is at approximately 7 feet bgs. In general, screen placement should range from 10 feet below to 5 feet above the water table.

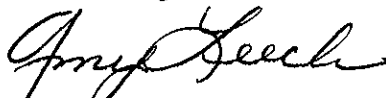
Varni
Re: 16525 Worthley Dr.
January 26; 1995
page 2 of 3

- o The development of monitoring wells must comply with Title 23, Article 4, Section 2649d8 of the California Code of Regulations:

72 or more hours following well construction, all ground water monitoring wells shall be adequately developed and equilibrium shall be established prior to any water sampling. Additionally, please be reminded to wait a minimum of 24 hours after development of the wells before sampling.
- o Subsequent to the installation of the monitoring wells, the well must be surveyed to an established benchmark, with an accuracy of 0.01 foot. Quarterly ground water monitoring and reporting will be required for RW-1, MW-2, and the new wells and annually for MW-8 until this site qualifies for closure. Ground water elevations and corresponding gradient determinations are to be conducted quarterly as well.
- o Submit a Health & Safety Plan for the proposed work to this office.
- o Per our letter dated September 21, 1994, we still have not received historical information regarding tank removals, initial soil samples of the tank pit and overexcavated soil, and documentation regarding disposal of the tanks and excavated soils. Please respond to this request as this information is vital to site assessment and eventual case closure.

Mr. Foster indicated we could expect a response to these items by next week. If you have questions please call me at (510)567-6755.

Sincerely,



Amy Leech
Hazardous Materials Specialist

Varni

Re: 16525 Worthley Dr.

January 26, 1995

page 3 of 3

cc: Anthony B. Varni
22771 Main Street
PO Box 778
Hayward CA 94543

Stason Foster
Lowney Associates
405 Clyde Avenue
Mountain View CA 94043

John Rogers QIC 50502
Alameda County Public Works

Edgar Howell

LOP - CHANGE RECORD REQUEST FORM

JMS

printed:
10/11/94

Mark Out What Needs Changing and Hand to LOP Data Entry
(Name/Address changes go to Annual Programs Data Entry)

AGENCY # : 10000 SOURCE OF FUNDS: F SUBSTANCE: 8006619
StID : 3604
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ADDRESS : 16525 Worthley Dr DATE CONFIRMED: 02/01/87
CITY/ZIP : San Lorenzo 94580 MULTIPLE RPs : Y

SITE STATUS

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RESPONSIBLE PARTY INFORMATION

RP#1-CONTACT NAME: Richard Ernest
COMPANY NAME: Crown Metal Mrg. Co. Inc.
ADDRESS: 765 South State Route 83
CITY/STATE: Elmhurst, Il 60126-4700
RP#2-CONTACT NAME: Elise Varon
COMPANY NAME: n/a
ADDRESS: 765 S. Route 83
CITY/STATE: Elmhurst, Illinois 60126
RP#3-CONTACT NAME: Na
COMPANY NAME: Cosmas, Ltd.
ADDRESS: 14 Mirada Road
CITY/STATE: Half Moon Bay, Ca 94019

new prop. owner
yes

INSPECTOR VERIFICATION:
□
□
□ NAME SIGNATURE DATE □
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What's Hot and What's Not (updated 1 September 1994) - The Fishing Report from *Fish First!*

Fishery	Water Conditions	Fishing Conditions, Techniques, and Hatches	Flies	Comments
Fall River	Clear, high water, lots of weeds.	Fishing is fair. Lots of 4-10" trout showing; larger fish are hard to find. Trico and BWO hatching from 7:30-10 am, with fish on surface. PMD hatch is spotty and goes from 11:30 am to 1:30 pm; most productive method is indicator nymphing in the 6-10' deep runs.	PMD nymph - HB PT, Burk's HB infrequen, poxyback PMD, beadhead PT (#16-18). PMD emerger/dry- short wing emerger, foam emerger, Lawson's halfback emerger, floating nymph, Harrop captive dun, Harrop hairwing, Lawson's no hackle, Lawson's cripple dun, Liabile CDC stillborn, CDC nymph/emerger, CDC comparadun, Shimazaki CDC dun, sparkle dun, CDC transitional dun, (#14-18). CDC rusty spinner (#18-20). Tricos (see Hat Creek) BWO (see Hot Creek).	Waders needed to access Cal Trout dock due to high water levels.
Hat Creek - Lower (PH-2 to Pit River)	Very clear. Lots of weeds.	Fishing is fair. Good trico and rusty spinner fall at 9 am; lots of small fish showing (look for larger fish along the banks and overhanging trees). Afternoons are slow; try hoppers or take a break. Rusty spinners, BWO (#22), and caddis hatching in the evening from 7-8 pm. Indicator nymphing in the PH #2 riffle is steady.	Sulfur hi-viz parachute, sulfur sparkle dun, sulfur shortwing emerger (#20-22). Trico adult - AK's parachute, Stalcup female CDC, Harrop CDC captive dun, Beit's spinner, CDC biot spinner, DB sparkle spinner, female poly spinner (#18-22). PMD (see Fall River). Caddis (see Lower Sac). BWO (see Hot Creek). Hoppers (see San Joaquin River)	The creek is receiving very little fishing pressure.
Heenan Lake	Clear, moderate level, lots of weeds. 60-70°F	Heenan Lake is opening 2 Sept and will be open each Fri, Sat, and Sun through October. Look for good fishing with streamers and damsel nymphs on sinking lines for 16-28" cutthroats. Early in the day the fish will be in 5-10' of water and as the water warms, they will drop into deeper, cooler water.	Streamers - krystal bugger, matuka, articulated leech, marabou leech, clouser minnow, zonker, marabou muddler minnow, spruce fly, Kaufmann's mini-leech (#4-10). Whitlock's damsel, Burk's damsel, AK's damsel, Barr's damsel (#10-12).	The fishing fee will be waived this year. No boat ramp access will be available; you need to carry your float tubes and boats to the water.
Hot Creek	60-65°F. Clear, Lots of weeds.	Fishing is fair. Best time to fish is from 6-11 am and 6-8 pm. Fish are rising in morning to BWO, tricos, and rusty spinners. Afternoon fishing is slow, some action on hoppers, beetles, and ants. Nymphing is tough due to weedbeds. Evening micro caddis and midges have fish on surface after sun is off the water.	BWO nymph - HB PT, poxyback BWO, brassie, beadhead brassie, DB baetis nymph (#18-22). BWO adult - sparkle dun, AK parachute, hi-viz parachute, stalcup CDC comparadun, shimazaki CDC dun (#18-22). BWO emerger - Lawson's BWO halfback, olive shortwing emerger, CDC nymph/emerger, barr's emerger, foam emerger, RS2 (#18-22). Caddis patterns (see Upper Sac River). Tricos (see Hat Creek). Ants, beetles (see Manzanita Lake) Hoppers (see San Joaquin River).	Fish are getting very selective; long leaders and fine tippets are the rule
Klamath River	Low, clear. 68-73°F.	The first decent push of half pound steelhead (12-18") have shown at the mouth of Blue Creek (below Johnson's). Swinging steelhead patterns on floating lines are top producer. Some reports of 15 fish days. Look for continued improvement in upcoming weeks (the start of the run looks promising).	Brindle bug, polar shrimp, skunk, green butted skunk, skykomish sunrise (#4-8).	Boat needed to access the mouth of the Blue, no road access available.
Manzanita Lake	Clear, cool, weedy.	Fishing is good. Stalk cruising fish from the shore with midges and terrestrials (ants, beetles) in the morning. Middy callibaetis hatch is fair one day and poor the next. Evening callibaetis hatch is good from 5-7 pm, with fish on surface. Midge hatch is good in evening after sun is off the water. Streamers and damsel nymphs also producing throughout the day.	Midge pupa/larva - disco, chironomid pupa, red worm, gray midge pupa, brassie, beadhead palamino, HB pheasant tail (#18-22). Midge adult - griffith's gnat, palamino, CDC hatching midge, CDC midge adult, parachute adams, midge biot emerger (#20-22). Callibaetis nymph - poxyback, leg nymph, hare's ear rubberleg, bird's nest (#14-16). Callibaetis adult - paranymp, CDC biot comparadun, cripple, sparkle dun, CDC nymph/emerger, AK's spinner (#14-16). CDC peacock beetle, foam beetle (#14-18). Mr. Bill's black ant, flying ant (#12-16). Streamers and damsels (see Lake Heenan)	Wind will slow dry fly fishing, but the fish will continue to feed on nymphs. Both wade and float tube fishing are productive.
McCloud River	Normal flow (170 cfs) 50-64°F.	Fishing is fair to good. Nymphing with a stonefly nymph and a small beadhead dropper in the pocket water and deeper runs is the best bet in morning and evening. Daytime fishing slows. Sporadic caddis and PED's hatching from 7 pm to dark, with some fish on the surface. Most rainbows and browns are 8-12", with an occasional fish to 16".	Stonefly nymphs (see Walker River). Beadheads (danger baby, prince, hares ear, flash gun, zug bug, peeking caddis) (#10-14) Prince, black AP, leg nymph (#10-16). PED (see PMD patterns for Fall River). Streamers (see Heenan Lake).	Large browns starting to show, use streamers early and late in the day in the tailouts of pools.
Pit River (PH-3 to 5)	Steady releases from Britton. 60-70°F. Normal clarity (slightly green).	Recent cooling trend has improved fishing on Pit #3. Indicator nymphing with 2-fly system is best choice in morning and evening. Caddis and mayflies hatching in the evening, with some fish rising in tailouts and slick water.	Beadheads (danger baby, prince, hares ear, flash gun, zug bug) (#10-14). Prince, black AP, hares ear rubberleg, zug bug (#10-16). Stonefly nymphs (see Walker River). Caddis (see Upper Sac) PED (see PMD patterns for Fall River).	The trout are in the fast, white water. Pit #4 & 5 are slow.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

September 21, 1994

COSMAS, LTD.
14 Mirada Road
Half Moon Bay, CA 94019

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

STID 3604

Re: Required investigations at ¹⁶⁵²⁵16252 Worthley Drive, San Lorenzo, California

Dear Mr. Varni,

This office has reviewed Lowney Associate's (Lowney) First Quarter 1994 Monitoring Report, containing responses to the County's April 27, 1994 letter. Lowney proposes to direct the site towards the newly established Non-Attainment Zone (NAZ) guidelines, formally known as Alternative Points of Compliance. A fundamental prerequisite for NAZ is that a site fully delineate the extent of its contaminant plume and encompass the plume with monitoring wells to identify any potential migration of this plume. As stated in the amended Regional Water Quality Control Board's (RWQCB) Basin plan, "the Regional Water Board will require dischargers to monitor for containment at points located at the pollution plume boundary, the property boundary, or at other appropriate locations. However, established cleanup levels that meet water quality objectives must be achieved at containment monitoring points." Your site has not yet fully delineated the extent of the ground water contaminant plume, which is also required under Article 11 Title 23 California Code of Regulations, or established the cleanup water quality objectives in the currently most downgradient well.

If you wish to pursue NAZ for your site, you will firstly be required to determine whether the ground water beneath the site recharges, or is hydraulically connected to, the canal. If it is, canal samples may be collected periodically to define the downgradient extent of the contaminant plume. If ground water is not hydraulically connected to the canal, an additional downgradient monitoring well will need to be installed.

Please be aware that NAZ is not a closure guideline, but rather a guideline for managing contaminated ground water. If you select the NAZ option, ground water monitoring must continue at the site. As stipulated in RWQCB's NAZ guidelines, you would be required to submit a plan including the assessment of human health and environmental risks; management measures (e.g., deed notifications/restrictions, indemnification agreements, site operation and maintenance, health and safety plans, utility workers notice, etc.); contingency options; and a commitment to

COSMAS, LTD.
Re: 16525 Worthley Drive
September 21, 1994
Page 2 of 2

mitigating measures.....The plan should recommend monitoring frequency and duration and a timeline for meeting closure criteria."

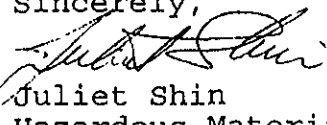
NAZ also requires that the "Discharger" shall assess both technical and economic feasibility to substantiate the reason for discontinuing remediation efforts at the site.

If the site meets the above requirements, the site will be eligible for NAZ. However, if, at any point during the monitoring, contaminant concentrations are shown to increase significantly, or the contaminant concentrations in the "zero line" or delineating wells are shown to exceed established cleanup levels, then further investigations or remediation may be required.

Lastly, per the County's April 27, 1994 letter, this office requested that you submit the report documenting the installation of RW-1 and all information and reports providing a history of the number and types of tanks removed from the site, the site's past uses, analysis results of all the samples collected from the tank pit, the confirmatory samples collected from the overexcavation of the pit, and documentation of the disposal of the excavated soil. This information has not yet been submitted to this office. Please make a diligent effort to procure this information, as it is essential for the accurate review and assessment of the status of this site.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,


Juliet Shin
Hazardous Materials Specialist

cc: Anthony B. Varni
22771 Main Street
P.O. Box 778
Hayward, CA 94543

Stason Foster
Lowney Associates
405 Clyde Avenue
Mountain View, CA 94043

Edgar Howell

Still waiting
1/20/95

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

April 27, 1994

COSMAS, LTD.
14 Mirada Road
Half Moon Bay, CA 94019

STID 3604

Re: Investigations at 16525 Worthley Drive, San Lorenzo,
California

To Whom It May Concern,

This office has received and reviewed Lowney Associates' (Lowney) work plan, dated April 1, 1994. In the work plan, Lowney proposed to disconnect the ground water extraction system at the site and continue quarterly ground water monitoring from Wells MW-2 and RW-1 for four additional quarters. If the concentrations remain consistent with the concentrations observed during ground water extraction, they wish to propose the site for closure. This proposal is not acceptable for the following reasons:

- o Although Lowney states that the levels of Benzene have frequently been below drinking water standards of 1 part per billion (ppb), this has not been the case for Well RW-1. Contrary to Lowney's proposal, the levels being observed in Well RW-1 cannot be left in place without, at a minimum, a risk assessment.
- o However, if it is shown that there is currently any off-site contamination, or a future threat of off-site contamination, a risk assessment will not be acceptable. Immediately downgradient of the currently sampled wells, MW-2 and RW-1, is a canal. If ground water extraction was halted, the canal may be impacted, due to plume migration. If you were to discontinue ground water extraction and conduct quarterly well monitoring, you would be required to include sampling of the canal as part of the quarterly monitoring events. If a risk assessment can be conducted, you will be required to assure that there will be no future impacts to the canal and any wildlife or humans coming in contact with the canal.
- o Although the contaminant levels observed in Well MW-2 and RW-1, appear to have attenuated recently, there are some concerns over the sometimes erratic behavior of the concentrations. For example, during the November 1992 sampling of Well MW-2, no benzene was detected, but the

COSMAS, LTD.

Re: 16525 Worthley

April 27, 1994

Page 2 of 3

quarter immediately before and after the November 1992 sampling event, fairly elevated levels of benzene were identified at 26 ppb and 17 ppb. Furthermore, during the March 1993 sampling of RW-1, 2,400 ppb TPHg and 330 ppb benzene was identified from RW-1, however, only one month later, no TPHg and 13 ppb benzene was identified from this well. This information indicates that not enough investigations may have been conducted to fully understand or characterize the problem.

- o In addition to the erratic behavior of contaminant concentrations, this office has noted that all the on-site wells, except for Well MW-8, appear to be screening significantly below the water table. Recently, in October 1993, this office obtained a copy of RESNA's August 1987 Soil and Ground Water Investigation Report, giving the screened intervals of the on-site wells, excluding RW-1. Wells 1, 3, and 4 are screened from 15 to 25 feet below ground surface (bgs), and Wells 2 and 5 are screened from 10 feet bgs. However, on average, the water table is located at approximately 7 feet bgs. As is commonly known, both dissolved-phase and separate-phase TPHg tends to float on top or near the top of the water table. Therefore, samples collected from the on-site wells may not be representative of the current ground water condition. In fact, some of the erratic concentrations may be attributable to the inadequate screen intervals.
- o This office is unable to accurately assess the status of the site, due to the fact that we are missing a substantial amount of information on site investigations. This office is requesting that you submit the report documenting the installation of RW-1, which provides details of the well construction (including the screen intervals), and all information and reports providing a history of the number and types of tanks removed from the site, the site's past uses, analysis results of all the samples collected from the tank pit and the confirmatory samples collected from the overexcavation of the pit, the disposal of the excavated soil, etc. This office essentially has no information on the site prior to the August 1987 report documenting some of the well installations.
- o Historically, the implementation of ground water extraction systems at other contaminated sites have shown ground water extraction to be a fairly good containment measure, but not an effective solution for remediation. Residual

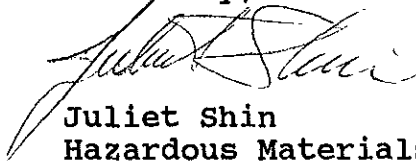
COSMAS, LTD.
Re: 16525 Worthley
April 27, 1994
Page 3 of 3

hydrocarbons are known to adhere to the pore spaces in isolated droplets, which is termed "residual saturation". These droplets become trapped in the pore spaces and tend to remain as a source of contamination by dissolving into the water. The occurrence of residual saturation is heightened in fine textured soil, which exists at your site, and although ground water extraction may intermittently remove the already dissolved phase of hydrocarbons in ground water, it does not effectively remove the residual contamination still remaining in the pores. Other methods are usually sought for remediating this residual soil contamination. The time it will take for the residual soil contamination to fully dissolve into the ground water is unpredicable, therefore, it is also unknown how much longer the ground water, and possibly the canal, will continue to be impacted subsequent to the discontinuation of the extraction system.

All the above questions and comments need to be addressed before this office can accurately assess the next required investigative steps at the site.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,



Juliet Shin
Hazardous Materials Specialist

cc: Anthony B. Varni
22771 Main Street
P.O. Box 778
Hayward, CA 94543

Ron L. Helm
Lowney Associates
405 Clyde Avenue
Mountain View, CA 94043

Edgar Howell-File(JS)

ALCO
HAZMAT

ANTHONY B. VARNI

22771 MAIN STREET

P. O. BOX 778

94 APR -6 PM 1:20 HAYWARD, CALIFORNIA 94543

(510) 886-5000

FACSIMILE
(510) 538-8797

April 4, 1994

Edgar B. Howell, III, Chief
Contract Project Director
ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
80 Swan Way, Room 200
Oakland, CA 94621

Site: StID: 3604
16525 Worthley Drive
San Lorenzo, CA

Dear Mr. Howell:

I have received your Notice of Requirement to Reimburse concerning the above location. Would you kindly see that your records reflect the correct name of the owner of the property, which is COSMAS, LTD., a California corporation, whose mailing address is 14 Mirada Road, Half Moon Bay, CA 94019. Thank you.

Very truly yours,


ANTHONY B. VARNI

ABV:jes
cc--Juliet M. Shin
Hazardous Materials Specialist

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

March 23, 1994

Mr. Anthony Varni
22771 Main St.
Hayward, CA 94543

STID 3604

Re: Investigations at 16526 Worthley Drive, San Lorenzo,
California

Dear Mr. Varni,

Per my conversation with Richard Garlow, RESNA, on March 23, 1994, it is the understanding of this office that you recently purchased the above property, and that you intend to take over the responsibility of resuming investigations at the site.

Quarterly ground water monitoring and ground water remediation is required to continue at the site. This office recently received the quarterly ground water monitoring report for the fourth quarter of 1993. The next quarterly report is due in April 1994. If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Richard Ernest
Crown Metal Manufacturing Co.
765 South State Route 83
Elmhurst, Il 60126-4700

Elise Varon
765 S. Route 83
Elmhurst, Illinois 60126

Edgar Howell-File(JS)

Crown  Metal
MANUFACTURING COMPANY INC.

765 SOUTH STATE ROUTE 83 • ELMHURST, ILLINOIS 60126-4700 • PHONE 708/279-9800 • FAX 708/279-9807

ALCO
HAZMAT
94 FEB 25 AM 11:30

February 17, 1994

Ms. Pamela Evans
Alameda County Health Care Services Agency
Department of Environmental Health
80 Swan Way Room 200
Oakland CA 94612

RE: Project No. F1587.33
Crown Metal/Pacific International Steel Facility
16525 Worthley Drive - San Lorenzo, CA 94580

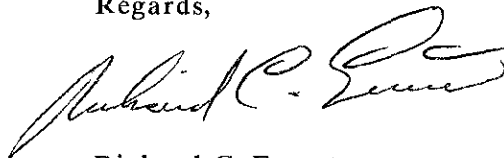
Dear Ms. Evans:

Please be advised that Crown Metal has sold the above referenced site back to the former owner effective February 17, 1994.

Therefore, we will not forwarding any further reports to you with regard to this agency and the work will be undertaken by the new owner.

Should you have any questions on the above or if I can be of further assistance please feel free to give me a call.

Regards,



Richard C. Ernest
President

RCE/meb

cc: Mr. Anthony B. Varni
Mr. Jim Lewis

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

May 12, 1993

Mr. Richard Earnest
Crown Metal Manufacturing Company
at Pacific International Steel
16525 Worthley Avenue
San Lorenzo, CA 94580

STID 3604

Re: Investigations at 16525 Worthley Avenue, San Lorenzo,
California

Dear Mr. Earnest,

This office has received and reviewed RESNA's latest quarterly report, dated April 1993. It appears in this last sampling event, groundwater levels in all the monitoring wells were much shallower than in all the previous quarters of monitoring. This office is concerned that historical shallow water levels may have deposited levels of hydrocarbons in the shallower soils, and that this contamination may be leaching out now with the rising ground water. Laboratory analysis results of the February 24, 1993 quarterly sampling event appears to support this idea, since contaminant concentrations in both MW-2 and RW-1 increased for this quarter in conjunction with the rising water table.

Consequently, this office is requesting that, if the water levels are as shallow for the next quarterly sampling event, the following wells should be sampled: Wells MW-8, MW-2, RW-1, MW-4, and MW-1.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Richard Hiatt, RWQCB

Mark Detterman
RESNA
3315 Almaden Expressway, Ste 34
San Jose, CA 95118

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

August 27, 1992

Richard Earnest
Crown Metal Manufacturing Company
at Pacific International Steel
16525 Worthley Avenue
San Lorenzo, CA 94580

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

STID 3604

RE: Request for information regarding former investigations
conducted at 16525 Worthley Avenue, San Lorenzo, California

Dear Mr. Earnest,

In a letter dated May 8, 1992, this office requested that you submit the results of pump tests performed at the site, which, according to a RESNA consultant, would show that the current operation of the ground water extraction system is preventing the possible migration of contaminants into the canal. This office would like a copy of the pump test results for review and confirmation of the above conclusion. Additionally, this office required that you submit lab analysis results for a water sample collected from the canal, and a diagram showing where this sample was collected.

To this date, this office has not received any of the above requested information. Please submit the required information **within 30 days** of the date of this letter.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Juliet Shin'.

Juliet Shin
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Jim Ferdinand, Eden Consolidated Fire Dept.

Jim Rubens
RESNA
42501 Albrae Street
Fremont, CA 94538

Mark Thompson, Alameda County District Attorney's Office
Edgar Howell-File (JS)

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

May 8, 1992

Richard Earnest
Crown Metal Manufacturing Company
at Pacific International Steel
16525 Worthley Avenue
San Lorenzo, CA 94580

STID 3604

RE: Delineation of groundwater contaminant plume at Crown Metal
Mfg. Company, located at 16525 Worthley Avenue, San Lorenzo,
California

Dear Mr. Earnest

It is the concern of this Department that groundwater contaminants are migrating off site and possibly into the canal that runs adjacent to the southern boundary of the above site. According to the groundwater sampling results for the last four quarters, it appears that the groundwater contamination plume is concentrated at the southern portion of your property in the area of Monitoring Wells RW-1 and MW-2.

Per Ms. Shin's conversation with Christopher Palmer of Resna, the results of pump tests at the site show that the current operation of the groundwater extraction system at the site is preventing the possible migration of contaminants into the canal. This office would like a copy of the pump test results for review and confirmation of the above conclusion. Additionally, Mr. Palmer stated that a water sample was formerly collected and analyzed from the canal. This office would like a copy of the lab analysis results for this sample and a diagram showing the location of the water sampling.

This office has received your request, dated April 30, 1992, for a reduction in sampling frequency for well MW-8. According to the four previous groundwater monitoring reports, this well has not identified concentrations of Total Petroleum Hydrocarbons as gasoline (TPHg) or benzene, toluene, ethylbenzene, or xylenes (BTEX) above the detection limits. Considering that no TPHg or BTEX has been detected in the groundwater collected from this well, and that a groundwater extraction system is currently in operation in close proximity to this well, this office approves of your request for a reduction in sampling frequency from quarterly to annually for well MW-8.

If you have any questions or comments, please contact Juliet Shin
at (510) 271-4320.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Jim Ferdinand, Eden Consolidated Fire Dept.

Christopher Palmer
c/o RESNA
42501 Albrae Street
Fremont, California 94538

File JB

92 APR 31 11:52

42501 Albrae Street
Fremont, California 94538
Phone: (510) 651-1906
FAX: (510) 651-8647

April 30, 1992
Project No. 1587-2G

County of Alameda
Division of Hazardous Materials
80 Swann Way
Oakland, CA 94621

Attention: Ms. Juliet Shin

Subject: Request for Reduction in Sampling Frequency for Well MW-8
Crown Metals Manufacturing — Pacific International Steel Facility
16525 Worthley Drive, San Lorenzo, California

Dear Ms. Shin:

On behalf of Crown Metal Manufacturing, RESNA Industries Inc. is requesting a reduction in the sampling frequency of groundwater monitoring well MW-8. Well MW-8 was installed in April 1991 downgradient from the former contaminant source area and is currently being sampled quarterly for the presence of total petroleum hydrocarbons as gasoline (TPHG) as well as benzene, toluene, ethyl benzene, and total xylenes (BTEX).

Four quarters of monitoring have been conducted on well MW-8 and to date, no TPHG or BTEX have been detected. Thus, at this time, RESNA is requesting a sampling frequency reduction for this well to annually. Water levels from the well will still be collected quarterly for the purpose of constructing a groundwater surface contour map for the site.

The next scheduled quarterly monitoring of the subject site is during May 1992. RESNA would appreciate a timely response, so that the revised sampling frequency will be enacted prior to sampling.

If you have any questions, please call.

Sincerely,
RESNA Industries Inc.

Britt Von Thaden
Britt Von Thaden
Project Geologist

Christopher M. Palmer
Christopher M. Palmer, C.E.G. 1262
Senior Program Geologist

BVT/CMP/da

cc: Mr. Richard Ernest, Crown Metal Manufacturing

WATER RESOURCES CONTROL BOARD
DIVISION OF WATER QUALITY - UST CLEANUP PROGRAM
SITE SPECIFIC QUARTERLY REPORT
01/01/92 THROUGH 03/31/92

AGENCY # : 10000 SOURCE OF FUNDS: F SUBSTANCE: 8006619
StID : 3604
SITE NAME: C M M & Pacific Int'l Steel DATE REPORTED : 02/01/87
ADDRESS : 16525 Worthley Dr. DATE CONFIRMED: 02/01/87
CITY/ZIP : San Lorenzo 94580 MULTIPLE RPs : Y

SITE STATUS

CASE TYPE: G	CONTRACT STATUS: 6	EMERGENCY RESP:
RP SEARCH: S		DATE COMPLETED: 12/26/91
PRELIMINARY ASMNT:	DATE UNDERWAY:	DATE COMPLETED:
REM INVESTIGATION: U	DATE UNDERWAY: 05/04/90	DATE COMPLETED:
REMEDIAL ACTION: U	DATE UNDERWAY: 08/01/90	DATE COMPLETED:
POST REMED ACT MON:U	DATE UNDERWAY: 12/04/90	DATE COMPLETED:

ENFORCEMENT ACTION TYPE: 1 DATE ENFORCEMENT ACTION TAKEN: 12/26/91
LUFT FIELD MANUAL CONSID: 3HSCARWG
CASE CLOSED: DATE CASE CLOSED:
DATE EXCAVATION STARTED : 12/01/88 REMEDIAL ACTIONS TAKEN: ED,GT

RESPONSIBLE PARTY INFORMATION

RP#1-CONTACT NAME: Richard Ernest
COMPANY NAME: Crown Metal Mrg. Co. Inc.
ADDRESS: 765 South State Route 83
CITY/STATE: Elmhurst, Il 60126-4700

RP#2-CONTACT NAME: David & Elise Varon
COMPANY NAME:
ADDRESS: 5925 So. Lowe Ave.
CITY/STATE: Chicage, Il 60621

UNDERGROUND STORAGE TANK CLEANUP SITE

SITE ID: 3604	SOURCE OF FUNDS: F	SUBSTANCE :8006619
SITE NAME: C M M & Pacific Int'l Steel		DATE REPORTED :02/01/87
SITE ADDRESS: 16525 -0 Worthley Dr.		DATE CONFIRMED:02/01/87
CITY: San Lorenzo	ZIP CODE: 94580	MULTIPLE PRs : Y
CASE TYPE: G	CONTRACT STATUS: 6	DATE EMERGENCY RESP:-0-
RP SEARCH : S		DATE END: 12/26/91
PRELIM ASSESSMENT : -	DATE BEGIN: -0-	DATE END: -0-
REMEDIAL INVESTIG.: U	DATE BEGIN: 05/04/90	DATE END: -0-
REMEDIAL ACTION : U	DATE BEGIN: 08/01/90	DATE END: -0-
POST REMED MONITOR: U	DATE BEGIN: 12/04/90	DATE END: -0-
ENFORCEMENT TYPE: 1	DATE ENFORCEMENT ACTION TAKEN: 12/26/91	
LUFT CATEGORY: 3HSCARWG	CASE CLOSED: -	DATE CASE CLOSED: -0-
DT EXC START : 12/01/88	REMEDIAL ACTIONS TAKEN: ED,GT	

PgDn for Screen #2

[ESC] Done [F2] Clear field [Shift-F2] Clear to end [Shift-F10] More

INSTRUCTIONS

2. SITE ADDRESS

Address at which closure or modification is taking place.

5. EPA I.D. NO.

This number may be obtained from the State Department of Health Services, 916/324-1781.

6. CONTRACTOR

Prime contractor for the project.

7. OTHER

List professional consultants here.

12. SAMPLE COLLECTOR

Persons who are collecting samples.

13. SAMPLING INFORMATION

Historic contents - the principal product(s) used in the last 5 years.

Material sampled - i.e., water, oil, sludge, soil, etc.

16. LABORATORIES

Laboratories used for chemical and geotechnical analyses.

17. CHEMICAL METHODS:

All sample collection methods and analyses should conform to EPA or DHS methods.

Contaminant - Specify the chemical to be analyzed.

Sample Preparation Method Number - The means used to prepare the sample prior to analyses - i.e., digestion techniques, solvent extraction, etc. Specify number of method and reference if not an EPA or DHS method.

Analysis Method Number - The means used to analyze the sample - i.e., GC, GC-MS, AA, etc. Specify number of method and reference if not a DHS or EPA method.

NOTE:

Method Numbers are available from certified laboratories.

18. SITE SAFETY PLAN

A plan outlining protective equipment and additional specialized personnel in the event that significant amount of hazardous materials are found. The plan should consider the availability of respirators, respirator cartridges, self-contained breathing apparatus (SCBA) and industrial hygienists.

ALAMEDA COUNTY
 WATER RESOURCES CONTROL BOARD
 DIVISION OF WATER QUALITY
 UST CLEANUP PROGRAM
 SITE SPECIFIC QUARTERLY REPORT
 FOR (70 Oct - 31 Dec 91)

CONTRACTOR NO 10000
 SITE NO: 3604
 SITE NAME: Crown Pacific Int'l Steel
 ADDRESS: 16525 Worshley Dr.
 CITY/ZIP: San Lorenzo, CA 94580

SOURCE OF FUNDS (S/F) _____

SUBSTANCE 8006619
 DATE REPORTED 02/-/87
 DATE CONFIRMED 02/-/87
 MULTIPLE RPS (Y/N)

SITE STATUS

CASE TYPE (U/S/G/D) _____ CONTRACT STATUS _____ EMERGENCY RESPONSE _____
 RP SEARCH (S/I/R/) _____ DATE UNDERWAY _____ DATE COMPLETED 12/26/91
 PRELIMINARY (U/C/) _____ DATE UNDERWAY _____ DATE COMPLETED _____
 ASSESSMENT _____
 REMEDIAL INVEST- (U/C/) _____ DATE UNDERWAY 5/4/90 DATE COMPLETED _____
 IIGATION _____
 REMEDIAL ACTION (U/C/I/) _____ DATE UNDERWAY 8/1/90 DATE COMPLETED _____
 POST REMEDIAL (Y/N/U/C/) _____ DATE UNDERWAY 12/4/90 DATE COMPLETED _____
 ACTION MONITORING _____
 ENFORCEMENT ACTION () _____ TYPE (1/2/3/4/5/6) _____ DATE TAKEN 12/26/91
 TAKEN _____
 LUFT FIELD MANUAL CONSIDERATION _____
 (CATEGORY 1, 2, 3 PLUS H, S, C, A, R, W, G, OR 0 AS APPLICABLE)
 CASE CLOSED (Y/R/C/L) _____ DATE CLOSED _____
 DATE EXCAVATION STARTED 12/1/88 REMEDIAL ACTIONS TAKEN ED, GT,

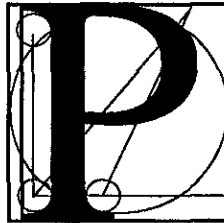
RESPONSIBLE PARTY INFORMATION

- | | |
|--|-----------------------|
| 1. CONTACT NAME <u>Richard Ernest</u> | 6. CONTACT NAME _____ |
| COMPANY NAME <u>Crown Metal Pkg. Co. Inc.</u> | COMPANY NAME _____ |
| ADDRESS <u>765 Soyuz State Route 83</u> | ADDRESS _____ |
| CITY/STATE <u>Elmhurst, IL 60126-4700</u> | CITY/STATE _____ |
| 2. CONTACT NAME <u>David S. El/Elise J. Varn</u> | 7. CONTACT NAME _____ |
| COMPANY NAME _____ | COMPANY NAME _____ |
| ADDRESS <u>5925 So. Lowe Ave.</u> | ADDRESS _____ |
| CITY/STATE <u>Chicago, IL 60621</u> | CITY/STATE _____ |
| 3. CONTACT NAME _____ | 8. CONTACT NAME _____ |
| COMPANY NAME _____ | COMPANY NAME _____ |
| ADDRESS _____ | ADDRESS _____ |
| CITY/STATE _____ | CITY/STATE _____ |
| 4. CONTACT NAME _____ | 9. CONTACT NAME _____ |
| COMPANY NAME _____ | COMPANY NAME _____ |
| ADDRESS _____ | ADDRESS _____ |
| CITY/STATE _____ | CITY/STATE _____ |
| 5. CONTACT NAME _____ | |
| COMPANY NAME _____ | |
| ADDRESS _____ | |
| CITY/STATE _____ | |

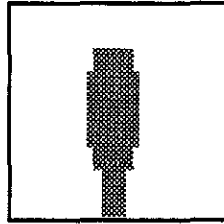
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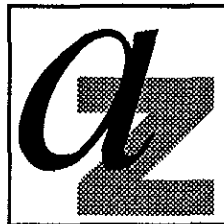
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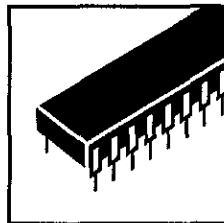
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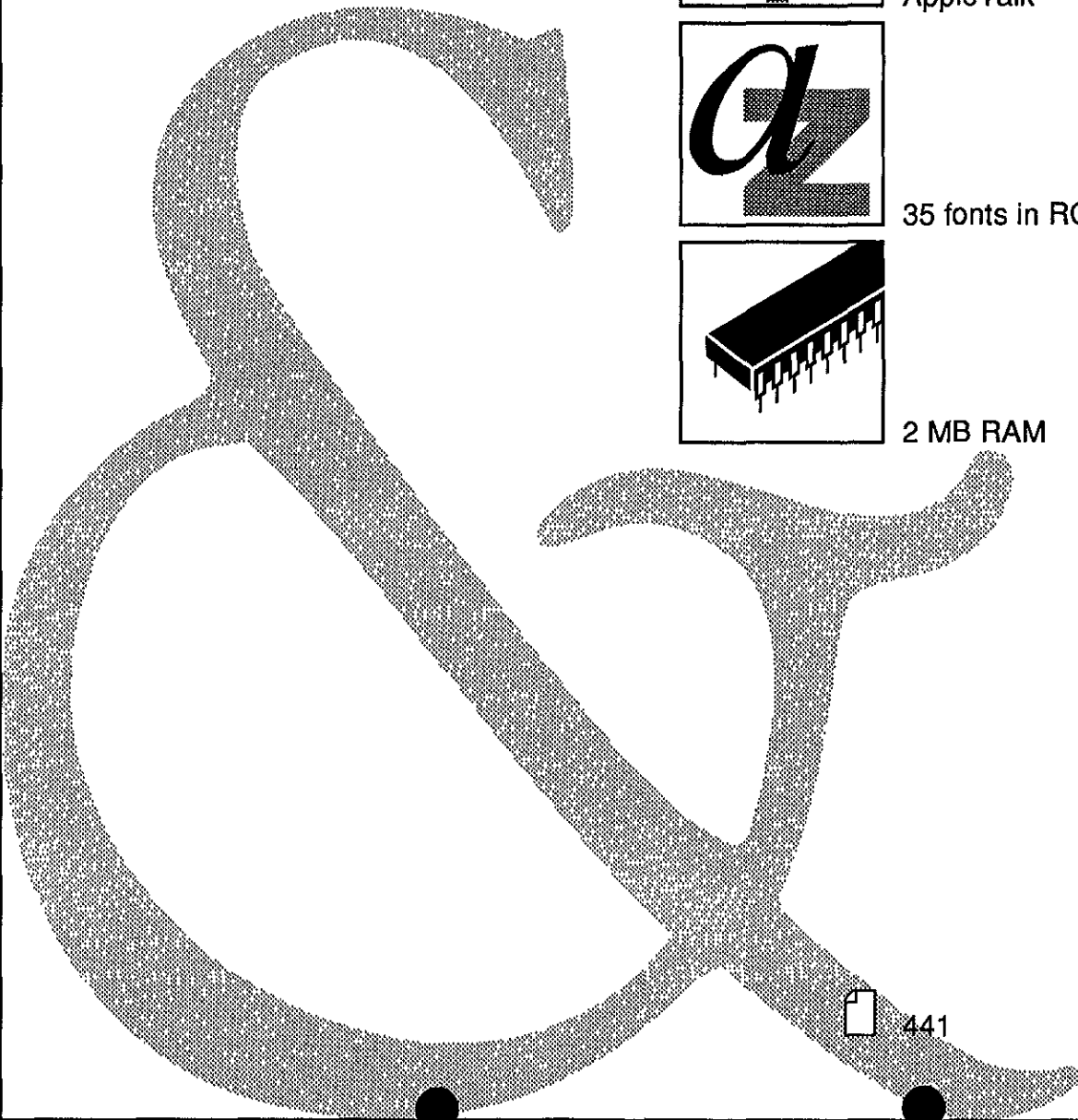
AppleTalk[®]



35 fonts in ROM



2 MB RAM



DATE:

TO : Local Oversight Program

FROM:

SUBJ: Transfer of Eligible Oversight Case

Site name: Crown Metal Mfg

Address: 16525 Worthley Dr city San Lorenzo zip 94580

Closure plan attached? Y N DepRef remaining \$ 72.36 (31.10)

DepRef Project # 4046A STID #(if any) 3604

Number of Tanks: 1 removed? Y N Date of removal Info is archived 1987

Samples received? Y N Contamination: TPH_g + BTEX 02--- 87

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

Monitoring wells on site 10 Monitoring schedule? Y N Quarterly

LUFT category 1 2 not all active 3 * H S C A R W G discovery
2 87

Briefly describe the following:

Preliminary Assessment GW contamination

Remedial Action Have GW recovery + treatment system operating

Post Remedial Action Monitoring _____

Enforcement Action _____

These people defined the plume sometime ago, (within last year) have had a treatment system in place + are continuing to monitor. Will not be eligible for closure for at least 9 mos to 1 year. No immediate action required

REVISED

4-7-86

30 APR 86

PARTY # 8

Arlene M. Broussard
Penny Burnstein
1 April 1986

METHODOLOGY

- 1) Research Zero-Base Budgeting (ZBB)
 - A. Books
 - B. Articles
 - C. Speak with professors
- 2) Look at applications of ZBB at other companies
- 3) Send questionnaire to the hydro and nuclear ecological sections and the technical support group at the department of engineering research (DER), (pilot study)
- 4) Review returned questionnaires
- 5) Develop ZBB prioritization scheme
- 6) Allocate workforce (PG&E employees, inside contractors, outside contractors)
- 7) Final report
 - A. General
 - B. Specific - DER

questionnaires looked funny
(1 line for benefits?)

researched ZBB for PG&E (pilot study)
recommended use if carefully monitored
top down implementation + training

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)

March 25, 1991

Richard Earnest
Crown Metal Manufacturing Company
at Pacific International Steel
16525 Worthley Av.
San Lorenzo CA 94580

RE: Proposed Installation of Additional Groundwater Monitoring Well
and Change in Monitoring Schedule for Upgradient Wells

Dear Mr. Earnest:

I have reviewed Exceltech's proposal for the installation of one additional downgradient well to define the extent of groundwater contamination at your San Lorenzo site. Exceltech proposes to delete upgradient wells MW-1, 4, 5, 6 and 7 from the quarterly monitoring schedule based on fairly consistent negative findings in these wells up to and including the last quarterly sampling results (February, 1991). With the installation of the new well, and the continued sampling of two existing wells, there would be three sampling points as of May 1991 from which to gather data about the extent of groundwater contamination.

Exceltech's proposal is acceptable to this office, however, should petroleum fuel contamination be detected in the newly installed well, additional groundwater monitoring wells will be required at your site.

You may contact me with any questions at (415)271-4320.

Sincerely,

Pamela J. Evans
Hazardous Materials Specialist

c: Richard Hiett, Regional Water Quality Control Board
Susan Keach, Oro Loma Sanitary District
Britt Von Thaden, Exceltech



91 FEB -8 AM 11:21

February 7, 1991

County of Alameda
Division of Hazardous Materials
80 Swan Way
Oakland, CA 94621

Attention: Ms. Pam Evans

Subject: Crown Metals Manufacturing Company
16525 Worthley Drive
San Leandro, California
Exceltech Project No. 3-3462-2


Dear Ms. Evans:

As I informed you during our discussion on February 7, 1991, one of the carbon beds in the remediation system at the above referenced site sustained a crack and some groundwater spillage occurred. The system was shut down and the carbon bed was replaced. The system was operational again as of January 30, 1990.

The total groundwater spilled appears to be small and the spilled groundwater has stayed in the vicinity of the well. This water is being absorbed by the ground and will be recovered again by the well pumping. We do not anticipate any adverse consequences by the spill and as per our conversation, we will be taking no additional action at this time other than restarting the system. We do not believe this is necessary as the cracked carbon bed was most likely caused by the unusually cold weather, which froze the line and caused a large pressure buildup in the bed. Further cold weather is highly unlikely to reoccur. To be on the safe side however, we are considering installing a pressure relief valve on the system which, in the event of another line freeze, will recirculate water back into the well rather than causing a possible system failure.

If you have any questions, please do not hesitate to call.

Sincerely,
Exceltech, Inc.


James D. Rubin
Project Engineer

JDR/tr

cc: Richard Ernest



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)

January 17, 1991

Richard Earnest
Crown Metal Manufacturing Company
at Pacific International Steel
16525 Worthley Av.
San Lorenzo CA 94580

RE: Groundwater Investigation and Remediation for Petroleum Fuel
Constituents

Dear Mr. Earnest:

I have reviewed the Quarterly Sampling Reports prepared by Exeltech for the groundwater investigation at your site. Since 1987, you have gathered sampling data for the shallow groundwater underlying your site. The data indicate that any groundwater contamination to the north and east of the former tank pit is decreasing. Wells to the south and west of the former pit are showing contaminant levels much above detectable.

I am aware that you have begun a groundwater remediation program at your site. However, it is clear from examining the analysis data that the full extent of the contaminant plume to the south and west of the former tank pit has not been defined. In order for you to define the contamination and to properly evaluate the effectiveness of your remediation, it will be necessary for you to install additional monitoring wells. These wells must be in the down gradient direction from existing wells (RW-1, MW-2, MW-7) that are currently showing contamination. Based on Exeltech's data, the down gradient direction is variable, ranging from southwest to southeast. Currently, the only wells that can be found in this arc are showing contamination. Therefore, additional wells are needed to define the outer edge of the contamination.

Please submit a workplan for additional well locations by February 28, 1991, and include a timetable for their installation. You may contact me with any questions at 271-4320.

In order to cover agency oversight costs, you must also submit a check to this office for \$500.00. Exeltech's May 4, 1990 correspondence mentioned that a check was enclosed, but we have received no additional funds.

Sincerely,

A handwritten signature in cursive script that reads "Pamela J. Evans".

Pamela J. Evans
Hazardous Materials Specialist

c: Richard Hiatt, Regional Water Quality Control Board
Britt Von Thaden, Exeltech



October 26, 1990

Alameda County Health Care Services Agency
Hazardous Materials Division
80 Swan Way
Oakland, California 94624

Attention: Ms. Pamela Evans
Hazardous Materials Specialist

Subject: Notification of Remediation Equipment Installation
Crown Metal Manufacturing Company at Pacific International Steel
16525 Worthley Drive, San Lorenzo, California
Exceltech Project No. 3462E

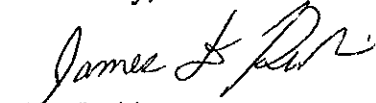
Dear Ms. Evans:

Exceltech, Inc. will be installing a groundwater remediation system at the above referenced site. The installation of this system is in accordance with a work plan previously approved by the Alameda County Health Care Services Agency. As requested in the addenda to the work plan (see attached letter), Exceltech is providing the following information prior to implementing the remediation:

- (1) A groundwater discharge permit has been issued by the Oro Loma Sanitary District. A copy of this permit is enclosed for your reference.
- (2) Target levels for completion of the groundwater remediation have not yet been established. These target levels will be determined by the California Regional Water Quality Control Board, San Francisco Bay Region. Exceltech will forward this information to the Alameda County Health Services Agency when received.
- (3) Exceltech proposes to begin installation of this system on October 29, 1990. Installation will require approximately 2 - 4 days to complete.

If you have any questions, please feel to call myself or Mr. John Turney.

Sincerely,


Jim Rubin
Staff Engineer

Enclosures:
JR/btm

cc: Mr. Richard Ernest, Crown Metals





ORO LOMA SANITARY DISTRICT

2600 GRANT AVENUE
SAN LORENZO, CALIFORNIA 94580
TELEPHONE (415) 276-4700
FAX (415) 276-1528

Directors
Carl E. Franson, President
Howard W. Kerr, Vice President
Kenneth G. Burkard, Secretary
Harvey V. Nolting, Director
M.L. Sanford, Director
General Manager
Paul H. Causey

August 10, 1990

Mr. Alonzo Gramados
Excel Tech
41674 Christie St.
Fremont, CA 94538-3114

Subject: Wastewater Discharge Permit - Crown Metal Manufacturing

Dear Mr. Gramados:

Enclosed is a revised wastewater discharge permit for the groundwater remediation project at 16525 Worthley Drive in San Lorenzo, California. Please note that the permit number was changed as was the expiration date. The rest of the permit is exactly as originally written. Please submit the \$400 application fee and the permit will be effective immediately.

Sincerely,

Douglas Humphrey
Director of Operations
and Maintenance

DH/ja

cc: Richard Ernst

DH/Gravados.let/ja

ORO LOMA SANITARY DISTRICT

WASTEWATER DISCHARGE PERMIT

COMPANY NAME: Crown Metal Manufacturing Company

MAILING ADDRESS: 5925 S. Lowe Ave.

Chicago, IL 60621-2896

FACILITY ADDRESS: 16526 Worthley Dr.

San Lorenzo, CA 94580

The above named company is authorized to discharge wastewater to the Oro Loma Sanitary District sanitary sewerage system in compliance with the District's Ordinance No. 39 (as amended) titled:

"AN ORDINANCE REGULATING THE USE OF PUBLIC AND PRIVATE SEWERS AND DRAINS REGULATING THE DISCHARGE OF WATERS AND WASTES INTO THE PUBLIC SEWER SYSTEM, PROVIDING FOR WASTEWATER DISCHARGE PERMITS AND FIXING PERMIT AND MONITORING FEES, AND PROVIDING FOR LIABILITIES AND PENALTIES FOR THE VIOLATION OF THE PROVISIONS THEREOF."

and in compliance with any Federal or State regulations that apply, and in accordance with effluent limitations, monitoring requirements and with any standard or special conditions set forth in this permit or modified during the term of this permit.

This permit is granted in accordance with the application filed on April 10, 1990 in the office of the Oro Loma Sanitary District and in conformity with specifications and information submitted to the District in support of the above referenced application.

PERMIT NO. 011

EFFECTIVE DATE: August 1, 1990

EXPIRATION DATE: August 1, 1991

APPROVED:

Paul H. Causey
GENERAL MANAGER, ORO LOMA SANITARY DISTRICT

The following sections (when checked) are attached and made a part of this permit:

Standard Conditions I
 Standard Conditions II
 Special Conditions

STANDARD CONDITIONS

Permit # 011
Page 2 of 9

LIMITATIONS ON WASTEWATER STRENGTH

METALS

	Maximum (mg/L)
ARSENIC	0.1
CADMIUM	0.2
COPPER	2.0
CHROMIUM	0.5
LEAD	1.0
MERCURY	0.01
NICKEL	1.0
SILVER	0.2
ZINC	3.0

OTHER LIMITED CONSTITUENTS

	Maximum (mg/L)
CYANIDE	1.0
PHENOLIC COMPOUNDS	1.0
T.I.C.H.	0.02
PH	5.5 minimum
TEMPERATURE	150 Degrees Fahrenheit

I. STANDARD CONDITIONS (ALL USERS)

A. Definitions. See Section 1.2. Ordinance 39-3, Attached.

B. General

The User shall comply with all the general prohibitive discharge standards in Article II of Ordinance No. 39-3.

C. Right of Entry

The User shall allow the District or its representatives to enter upon the premises of the User, at all reasonable hours, for the purposes of inspection, sampling or records inspection. Reasonable hours in the context of inspection and sampling includes any time the User is operating any process which results in a process wastewater discharge to the District's sewerage system.

D. Records Retention

The User shall retain and preserve for no less than three (3) years any records, books, documents, memoranda, reports, correspondence and any and all summaries thereof, relating to monitoring, sampling and chemical analyses made by or on behalf of the user in connection with its discharge. Records shall be made available for inspection and copying by representatives of the District, the California Regional Water Quality Control Board or the Environmental Protection Agency. All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the District shall be retained and preserved by the User until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

E. Confidential Information

Except for data determined to be confidential under the provisions of Ordinance No. 39-3, all reports required by the permit shall be available for public inspection at the District Office, 2600 Grant Avenue, San Lorenzo, California.

F. Dilution

No User shall increase the use of potable or process water or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

G. Proper Disposal of Pretreatment Sludges and Spent Chemicals

The disposal of sludges and spent chemicals generated shall be done in accordance with all applicable State and Federal regulations.

H. Signatory Requirement

All reports required by this permit shall be signed by an authorized representative of the User, as defined in Section 1.2 of Ordinance 39-3.

I. Revocation of Permit

The permit issued to the User by the District may be revoked when, after inspection, monitoring or analysis it is determined that the discharge of wastewater to the sanitary sewer is in violation of Federal, State or Local laws, ordinances, or regulations. Additionally, refusal of access to the premises for inspection, falsification or intentional misrepresentation of data or statements pertaining to the permit application or any other required reporting form shall be cause for permit revocation.

J. Limitation on Permit Transfer

Wastewater Discharge permits are issued to a specific user for a specific operation and are not assignable to another user or transferable to any other location without the proper written approval of the District. Sale by a User shall obligate the purchaser to seek prior written approval of the District for continued discharge to the sewerage system and issuance of new permit.

K. Falsifying Information or Tampering with Monitoring Equipment

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate may result in punishment in accordance with District Ordinances or other applicable laws.

L. Modification or Revision of the Permit

The terms and conditions of this permit may be subject to modification by the District at any time as limitations or requirements as identified in the District Ordinance No. 39 (as amended) are modified, or if other just cause exists.

This permit may also be modified to incorporate special conditions resulting from the issuance of a special order by an agency which regulates the District's discharge.

The terms and conditions may be modified as a result of Environmental Protection Agency promulgating a new federal pretreatment standard.

Any permit modifications which result in new conditions in the permit shall include a reasonable time schedule for compliance if necessary.

M. Duty to Reapply

The District shall notify a User prior to the expiration of the User's Permit. Within thirty (30) days of the notification, the User shall reapply for reissuance of the permit on a form provided by the District, if discharge to the system is still needed.

N. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

O. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any invasion of personal rights, nor any infringement of Federal, State or Local regulations.

P. Permit Duration

The wastewater discharge permit will remain in effect for one year from the effective date of the permit. Users who are issued a wastewater discharge permit or renew a wastewater discharge permit shall pay the permit fee set forth in the current schedule of fees as adopted in the most current amendment to Ordinance No. 39.

Q. Wastewater Charges and Fees

The User shall pay to the District all sewer service charges, permit fees, monitoring charges and laboratory analysis charges levied in accordance with current District Ordinances. all charges are due and payable upon receipt of statement of charges, Failure to pay fees within 30 days may result in revocation of wastewater discharge permit and termination of service. Overdue fees shall be assessed a 10% penalty plus interest of 1-1/2% per month until fees have been paid.

R. Reporting Requirements

1. In order that employees of Users be informed of District requirements, Users shall make available to their employees copies of the District's Discharge Regulations together with other wastewater information and notices which maybe furnished by the District. User shall permanently post a notice advising employees whom to call in case of spill or accidental discharge.
2. The User shall notify the District immediately upon any accidental or slug discharge to the sanitary sewers as outlined in the Discharge Regulations. Formal written notification discussing circumstances and remedies shall be submitted to the District within 5 days of the occurrence. The User shall work with the District to resolve any problems caused by such accidental or slug discharge.
3. The User shall notify the District prior to the introduction of new wastewater or pollutants or any substantial change in the volume of characteristics of the wastewater being introduced into the POTW from the User's industrial processes. Formal written notification shall follow within 30 days of such introduction.
4. Any upset experienced by the User of any of its treatment processes that places the User in a temporary state of noncompliance with wastewater discharge limitations contained in their permit or other limitations specified in the District's Ordinance shall be reported to the District within 24 hours of first awareness of the commencement of the upset. A detailed report shall be filed with the District within five days of the start of the upset.

SPECIAL CONDITIONS

Permit # 011
Page 7 of 9

Discharge Standards

Benzene, Toluene, Ethylbenzene and Xylene levels in discharged water shall be non-detectable.

Total Petroleum Hydrocarbons (TPH) in discharged water shall be a maximum of 15 mg/L.

GENERAL

The permittee shall notify the District's Chemist (278-1747) no less than 2 hours prior to commencement of any pumping activity and request an inspection of the site. **No pumping shall occur** until District staff has inspected the site, piping, pumping set-up, metering and discharge points.

There shall be no bypassing of any treatment process or unit or direct discharge into the sewer system at any time.

The permittee assumes full responsibility for any and all damages to the collection system or to the Publicly Owned Treatment Works (P.O.T.W) otherwise known as the Oro Loma/Castro Valley Treatment Plant, that can be directly attributed to the discharge of treated groundwater from the operation at the site.

BILLING AND PERMIT EXTENSIONS

The permittee will pay all District fees for sampling, monitoring, inspections, loading charges, as well as any other related District expenses billed prior to the expiration of this permit.

The District will not consider an extension of this permit until all fees and reimbursable costs have been paid by the permittee.

PRE-PUMPING AND EMERGENCY NOTIFICATION

In the event of any explosive condition or other potentially harmful situation which may affect either the collection system or the P.O.T.W., the permittee shall contact the District at 278-1747 immediately (operators are on duty 24 hours per day).

The Eden Regional Fire Department shall be notified of the clean-up operation.

If air stripping is part of the treatment process, the Bay Area Air Quality Control Board shall be notified of the process. If a permit is issued by the Air Board, a copy of that permit and subsequent extensions shall be submitted to the District.

SAMPLING AND MONITORING

GENERAL

The permittee shall provide easily accessible sampling points for both pre and post treatment samples.

The District reserves the right to sample at will for any constituents it deems necessary on the groundwater samples collected on both pre and post treatment samples.

Sampling frequency will increase if test results show discharge levels are bordering on the 15 mg/L limit for Total Petroleum Hydrocarbons.

INITIAL SAMPLING

During the initial 3 hour start-up pumping period, the effluent discharge from the treatment process shall not be sewerred. The total volume will be contained in a tank. The system will be shut down and analysis performed to determine TPH level. Further processing of the groundwater shall only be allowed after analyses indicate that the contents of the tank meet all of the limitations set forth in this permit.

Constituents to be analyzed for on the initial sample include:

- a. Metals (see page 2), Phenols, & Cyanide
- b. General Analysis (COD, SS, PH)
- c. Total Petroleum Hydrocarbons (EPA 8015)
- d. BTEX (EPA 8020)

PROPOSED SAMPLING AFTER INITIAL TESTS

One week after discharge begins analyze for TPH.

If TPH levels are above 10 mg/L on first week's sample, another sample will be grabbed immediately upon receipt of lab results from first sample. This will continue as long as the District deems it necessary.

When the District staff is convinced that TPH levels have stabilized, one general analysis, one TPH, and one BTEX per month for the duration of the of the pumping operation.

Results of these analyses will be transmitted to the District on a timely basis. Monthly flow data will be transmitted to the District no later than the 10th day of the following month.

METERING

The permittee shall submit specifications of the proposed flow meter to the District for approval. The meter must be appropriate for all anticipated conditions of flow and pressure, and must include a non-resettable totalizer and fittings to allow for a "fill-up" test to verify the accuracy of the meter. This can also serve as the sampling point for discharge.

FEES

An annual permit fee of \$400 is charged with the issuance and any subsequent renewals of this discharge permit.

Sewer service and use charges will be \$1.472/hcf or \$1.97 per thousand gallons of water discharged.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



Telephone Number: (415)

May 15, 1990

Richard Earnest
Crown Metal Manufacturing Company at Pacific International Steel
16525 Worthley Dr.
San Lorenzo CA 94580

RE: Addenda to Groundwater Remediation Plan for Pacific
International Steel

Dear Mr. Earnest:

My staff has reviewed the addenda to the work plan prepared by Exceltech for the above referenced facility. The items requested in my April correspondence have been addressed and remediation work may proceed once a discharge permit from either the Sanitary District or the Regional Water Quality Control Board is issued. Before implementing remediation, please take the following steps:

1. Provide this office with confirmation that the discharge permit has been issued.
2. Also supply information regarding the proposed parameters of the remediation, including target levels for cleanup and approximate volume of groundwater expected to be treated.
3. Notify this office at least 48 hours in advance of installing remediation equipment.

Please contact Pamela Evans, Hazardous Materials Specialist, at 271-4320 with any questions you may have.

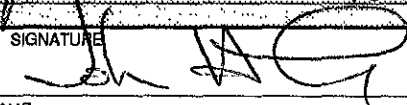
Sincerely,

Edgar B. Howell III, Chief
Hazardous Materials Division

EBH:PJE

c: Lester Feldman, Regional Water Quality Control Board
Gil Jensen, Alameda County District Attorney
Alonzo Granados, Exceltech

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

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		FOR LOCAL AGENCY USE ONLY. I HEREBY CERTIFY THAT I AM A DESIGNATED GOVERNMENT EMPLOYEE AND THAT I HAVE REPORTED THIS INFORMATION TO LOCAL OFFICIALS PURSUANT TO SECTION 26180.7 OF THE HEALTH AND SAFETY CODE.	
REPORT DATE 05/09/90		CASE #		SIGNED: <i>Pamela Evans</i> DATE: 5-15-90	
REPORTED BY	NAME OF INDIVIDUAL FILING REPORT John H. Turney		PHONE (415) 659-0404		SIGNATURE 
	REPRESENTING <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OTHER		COMPANY OR AGENCY NAME Exceltech, Inc.		
	ADDRESS 41674 Christy Street, Fremont, CA 94538-3114				
RESPONSIBLE PARTY	NAME Elise Varon <input type="checkbox"/> UNKNOWN		CONTACT PERSON Richard Ernest		PHONE (312) 873-3833
	ADDRESS 5925 South Lowe Avenue, Chicago, IL 60621-2896				
SITE LOCATION	FACILITY NAME (IF APPLICABLE) Pacific International Steel Corporation		OPERATOR James H. Lewis		PHONE (415) 481-0900
	ADDRESS 16525 Worthley Drive, San Lorenzo, Alameda 94580				
	CROSS STREET Grant Street				
IMPLEMENTING AGENCIES	LOCAL AGENCY Alameda County Health Care Services Agency		CONTACT PERSON Pamela Evans		PHONE (415) 271-4320
	REGIONAL BOARD Calif. Reg. Water Ut. Cont. Brd., Region 2		CONTACT PERSON Lester Feldman		PHONE (415) 464-1255
SUBSTANCES INVOLVED	(1) Aviation fuel		QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN		
	(2) Unleaded gasoline		<input checked="" type="checkbox"/> UNKNOWN		
DISCOVERY/ABATEMENT	DATE DISCOVERED 05/08/90		HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> TANK TEST <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> OTHER		
	DATE DISCHARGE BEGAN 05/08/90 <input type="checkbox"/> UNKNOWN		METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> REMOVE CONTENTS <input type="checkbox"/> REPLACE TANK <input type="checkbox"/> CLOSE TANK <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> CHANGE PROCEDURE		
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE 05/08/90		<input checked="" type="checkbox"/> OTHER remove tanks		
SOURCE/ CAUSE	SOURCE OF DISCHARGE <input checked="" type="checkbox"/> TANK LEAK <input type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER		CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input checked="" type="checkbox"/> SPILL <input type="checkbox"/> CORROSION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER		
	CHECK ONE ONLY <input type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input checked="" type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)				
CURRENT STATUS	CHECK ONE ONLY <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED <input type="checkbox"/> POLLUTION CHARACTERIZATION <input type="checkbox"/> LEAK BEING CONFIRMED <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT UNDERWAY <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input checked="" type="checkbox"/> REMEDIATION PLAN <input type="checkbox"/> CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> CLEANUP UNDERWAY				
	CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS) <input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input checked="" type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> VENT SOIL (VS) <input type="checkbox"/> VACUUM EXTRACT (VE) <input type="checkbox"/> OTHER (OT)				
COMMENTS	The fuel release occurred when the fuel storage tanks were removed. The above information was supplied to Exceltech, Inc. by Mr. Richard Ernest, President of Crown Metal Manufacturing Company.				

April 10, 1990

Richard Earnest
Crown Metal Manufacturing Company at Pacific International Steel
16525 Worthley Dr.
San Lorenzo CA 94580

RE: Groundwater Remediation at Pacific International Steel

Dear Mr. Earnest:

My staff has reviewed the work plan prepared by Exceltech for ground water remediation at the above referenced facility. Before any further cleanup work can take place at the site, the following issues must be addressed. The required information may be submitted as addenda to the work plan.

*not awaiting
in 5/4 letter
from Exceltech*
1. In order to cover our costs for overseeing this remediation, a deposit of \$500.00 must be submitted, payable to County of Alameda.

2. Please supply the following information concerning tank removal activities: *No removal records, leakage occurred at time of removal*

- a. Date of tank removals
- b. Number of tanks removed and their sizes
- c. All materials stored in the tanks
- e. Sampling activities connected with the tank removal and sampling results
- f. We will also need copies of hazardous waste manifests for each tank

✓3. A report of the underground tank leak should have been submitted to this office once the leak was discovered. Our files contain no release report for this property. Enclosed is a report form that you may use to supply information about the release. *mail along one*

✓4. Supply a complete description of storage, disposal and backfilling activities connected with all contaminated soil.

✓5. Include a characterization of the subsurface soils and the aquifer, as well as a discussion of the potential short and long term impacts of the groundwater contamination found at the site in your additions to the plan.

-WARNING- No rows satisfy the WHERE clause

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



April 18, 1990

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

SECOND NOTICE OF VIOLATION

Dear owner/operator:

Our records indicate that there are underground tank(s) at your site at the above facility. You were notified of this situation months ago and have not taken the appropriate action as described below.

In accordance with the California Code of Regulations, Title 23, Chapter 3, Subchapter 16 Underground Tank Regulations you must perform one of the following actions:

1. Submit a tank closure plan to this Department as required by Article 7, 2670, or
2. Apply for a permit as required by Article 10, 2710.

You are directed to notify this Department within 10 days of your intentions and to obtain the necessary instructions and forms.

Please note that section 25299 of the California Health and Safety Code states that any operator or owner of an underground storage tank is liable for a civil penalty of not less than five hundred dollars or more than five thousand dollars per day for failure to obtain a permit, or failing to properly close an underground storage tank, as required by section 25298.

If you have any questions concerning this matter, please contact this office at 271-4320.

Sincerely,

Thomas F. Peacock, Senior HMS
Hazardous Materials Division

TFP:tfp

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Lester Feldman, RWQCB

April 9, 1990
Richard Earnest
Crown Metal Manufacturing Company
Page 2 of 2

6. Submit a site safety plan as part of the proposal.
7. A permit for the proposed treatment system may be needed from California Department of Health Services, Alternative Technology Division. This matter should be investigated before work proceeds.
8. Please describe the intended manner of disposal for contaminated material in the spent carbon beds.

Once a permit is issued by either Oro Loma Sanitary District or The Regional Water Quality Control Board, provide this office with confirmation that a discharge permit has been issued. Also supply information regarding the proposed parameters of the remediation, including target levels for cleanup, approximate volume of groundwater expected to be treated and duration of the remediation operation.

Please contact Pamela Evans, Hazardous Materials Specialist, at 271-4320 with any questions you may have.

Sincerely,

Edgar B. Howell III, Chief
Hazardous Materials Division

EBH:PJE

c: Lester Feldman, Regional Water Quality Control Board
Gil Jensen, Alameda County District Attorney
Alonzo Granados, Exceltech

10/27/89 4
 10/31/89 5
 ALAMEDA COUNTY 5
 11/01/89 6
HEALTH CARE SERVICES 6
 11/03/89 2
 AGENCY 5
 11/06/89 5
 DAVID J. KEARS, Agency Director 6
 11/07/89 6



DEPARTMENT OF ENVIRONMENTAL HEALTH
 Hazardous Materials Program
 80 Swan Way, Rm. 200
 Oakland, CA 94621
 (415)

More output follows - press [ESC] to quit, any key to continue
 InspDat Number of Occurrences

 11/14/89 3
 11/15/89 5
 11/16/89 4
 11/17/89 4
 11/20/89 2
 11/21/89 5
 11/22/89 9
 11/28/89 6
 11/29/89 6
 11/30/89 8
 12/01/89 5
 12/05/89 7

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 Lester Feldman, RWQCB

SECTION C
HAZARDOUS SUBSTANCES

C1. Please check if any of the following categories of hazardous substances is used or handled by your firm:

TOXIC CORROSIVE
FLAMMABLE OR IGNITABLE REACTIVE

C2. Please check the attached list for any of the chemical substances you receive, store, mix, treat, formulate, generate, manufacture, transport or dispose of, and enter each by the number identified on the list in the spaces below:

Sample:

1	3	1	8	3	4	8	4	3												

CERTIFICATION

I hereby certify that the information on this form is to the best of my knowledge, true and complete

Don Mohrweiss
Signature

Don Mohrweiss
Typed or Printed Name

General Manager
Title

January 16, 1986
Date

Please return completed form to:

Alameda County Division of Environmental Health
470-27th Street, Room 322
Oakland, CA 94612
(415) 874-7237