







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

March 27, 2007

Ms. Teri Peterson Cargill Salt Company 7220 Central Avenue Newark, CA 94560-4205

Subject: SLIC Case No. RO0002480 and Geotracker Global ID SL0600177511, Cargill Salt, 2016 Clement Street, Alameda, CA 94501

Dear Ms. Peterson:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site, including the recently submitted reports entitled, "Soil Vapor Sampling at Cargill Salt Alameda Facility," dated March 1, 2007 and "Groundwater Monitoring Results, Second Semi-Annual 2006 Monitoring Period, Cargill Salt – Alameda Facility, Alameda, California," dated February 28, 2007. Both reports were prepared on your behalf by Crawford Consulting, Inc. The Soil Vapor Sampling report presents the results of soil vapor sampling conducted at 11 on-site locations. Tetrachloroethene (PCE), which is the chemical detected at the highest concentrations in groundwater, was detected in 9 of the 11 soil vapor samples at concentrations ranging from 0.23 to 2.9 micrograms per kilogram. The report indicates that the potential for significant migration of soil vapor appears limited. As discussed in a telephone conversation between Jerry Wickham of ACEH and Teri Peterson of Cargill Salt on March 27, 2007, further soil vapor sampling is not required at this time provided that the concentrations of volatile organic compounds in groundwater continue to decrease over time. ACEH requests that groundwater monitoring be continued on a quarterly basis to evaluate the effectiveness of the ongoing phytoremediation.

We request that you perform the proposed work and send us the reports described below.

TECHNICAL REPORT REQUEST

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

- October 1, 2007 Semi-annual Monitoring Report for First and Second Quarter 2007
- March 1, 2008 Semi-annual Monitoring Report for Third and Fourth Quarter 2007

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

Ms. Teri Peterson March 27, 2007 Page 2

ELECTRONIC SUBMITTAL OF REPORTS

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PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety

Ms. Teri Peterson March 27, 2007 Page 3

Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

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

Sincerely,

Jerry Wickham

Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Mark Wheeler
 Crawford Consulting, Inc.
 2 North First Street, 4th floor
 San Jose, CA 95113

Donna Drogos, ACEH Jerry Wickham, ACEH File

Wickham, Jerry, Env. Health

To:

Mark Wheeler

Cc:

Teri_Peterson@cargill.com; allen@crawfordconsulting.com; dana@crawfordconsulting.com

Subject: RE: ADDRESS CORRECTION RE: Soil vapor sampling at Cargill Alameda site Friday Dec 8

Mark,

Thanks for the update and address correction.

Regards,

Jerry Wickham

Alameda County Environmental Health 1131 Harbor Bay Parkway Alameda, CA 94502-6577 510-567-6791 Phone 510-933-9335 Fax ierry.wickham@acaov.ora

From: Mark Wheeler [mailto:mark@crawfordconsulting.com]

Sent: Tuesday, December 05, 2006 9:54 AM

To: Wickham, Jerry, Env. Health

Cc: Teri_Peterson@cargill.com; allen@crawfordconsulting.com; dana@crawfordconsulting.com; **Subject:** ADDRESS CORRECTION RE: Soil vapor sampling at Cargill Alameda site Friday Dec 8

Jerry-

The correct address for the Cargill Alameda site is 2016 Clement Avenue, not 2016 Clement Street, in case you use a mapping program to try and find the site.

Your August 24, 2006 letter requesting a workplan, and our response letter dated November 8, 2006 both incorrectly identify the address as Clement Street rather than Clement Avenue. Sorry we didn't catch this sooner.

-Mark

From: Mark Wheeler [mailto:mark@crawfordconsulting.com]

Sent: Monday, December 04, 2006 3:31 PM

To: 'jerry.wickham@acgov.org'

Cc: 'Teri_Peterson@cargill.com'; 'allen@crawfordconsulting.com'; 'dana@crawfordconsulting.com'

Subject: Soil vapor sampling at Cargill Alameda site Friday Dec 8

Jerry-

We have scheduled TEG, our soil vapor sampling contractor, to come out to the 2016 Clement St, Alameda site this Friday, Dec 8, to do the soil vapor sampling per the approved workplan.

A Crawford Consulting field geologist, Allen Waldman, will be onsite to coordinate the work. His cell number is 408.460.6946.

Drop by if you are interested in seeing the work. They are meeting at 8, but probably after 9 is better to give them a chance to get set up and underway.

The weather forecast says a slight chance of rain Friday. We'll check the forecast again on Thursday and make the final call for doing the field work Friday. Heavy rain would postpone, but light scattered showers would not.

-Mark

Mark C. Wheeler Crawford Consulting, Inc. 2 North First Street, 4th Floor San Jose, CA 95113-1212

Tel 408-287-9934 Fax 408-287-9937 Cell 408-316-4401 Email: mark@crawfordconsulting.com

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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

November 29, 2006

Ms. Teri Peterson Cargill Salt Company 7220 Central Avenue Newark, CA 94560-4205

gill Salt, 2016 Clement Street, Alameda, CA – Work Subject: SLIC Case No.

Plan Approval

Dear Ms. Peterson:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the abovereferenced site, including the reports entitled, "Work Plan for Cargill Salt Alameda Facility," dated November 8, 2006 and "Groundwater Monitoring Results, First Semi-Annual 2006 Monitoring Period, Cargill Salt - Alameda Facility, Alameda, California," dated November 8, 2006. The First Semi-Annual 2006 Monitoring Report, which was prepared by Crawford Consulting, Inc., presents the results of quarterly groundwater monitoring conducted at the site in the first and second quarters of 2006 and discusses the status of the ongoing phytoremediation project. The Work Plan presents a response to technical comments and proposed scope of work to collect and analyze soil vapor samples from 10 sampling locations. The proposed soil vapor sampling is approved for implementation.

We request that you perform the proposed work and send us the reports described below.

TECHNICAL COMMENTS

- Likely Source of VOCs. The response in the November 8, 2006 Work Plan regarding the likely source of VOCs is acceptable. No further investigation of the source of the release is required at this time.
- Use of the Upper 4 Feet of Soils as Backfill. The response in the November 8, 2006 Work 2. Plan regarding the use of the upper 4 feet of soils as backfill for the excavation in the source area is acceptable. No further action regarding the backfill is required at this time.
- Potential Indoor Air Vapor Intrusion. The proposed scope of work to collect and analyze soil vapor samples at 10 sampling locations is approved for implementation. Please present the results in the Soil Vapor Sampling Report requested below.
- Remediation of PCE Source and Groundwater Monitoring. The use of phytoremediation to reduce VOC concentrations in the source area and main plume area is acceptable. The effectiveness of the phytoremediation project to reduce VOC concentrations to acceptable levels is to be monitored and evaluated over time. Groundwater levels are to be measure'd and groundwater samples collected from the four site monitoring wells on a quarterly basis.

Ms. Teri Peterson November 29, 2006 Page 2

All groundwater samples are to be analyzed for VOCs using EPA Method 8260B or an equivalent EPA approved method. Please present the results on a semi-annual basis in the monitoring reports requested below.

5. **Metals in Surface Soils.** The response in the November 8, 2006 Work Plan regarding the adequacy of the surface soil sampling program is acceptable. No further investigation of the metals in surface soil is required at this time.

TECHNICAL REPORT REQUEST

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

- March 1, 2007 Semi-annual Monitoring Report for Third and Fourth Quarter 2006
- April 13, 2007 Soil Vapor Sampling Report
- October 1, 2007 Semi-annual Monitoring Report for First and Second Quarter 2007
- March 1, 2008 Semi-annual Monitoring Report for Third and Fourth Quarter 2007

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

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Ms. Teri Peterson November 29, 2006 Page 3

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PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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AGENCY OVERSIGHT

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

Sincerely,

Hazardous Materials Specialist

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cc: Mark Wheeler
 Crawford Consulting, Inc.
 2 North First Street, 4th floor
 San Jose, CA 95113

Donna Drogos, ACEH Jerry Wickham, ACEH File

7

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 24, 2006

Ms. Teri Peterson Cargill Salt Company 7220 Central Avenue Newark, CA 94560-4205

Subject: SLIC Case N

Cargill Salt, 2016 Clement Street, Alameda, CA

Dear Ms. Peterson:

I am the caseworker currently assigned to this case. Please send any future correspondence regarding this case to my attention. Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site. The most recent report in our files is entitled, "Groundwater Monitoring Results, First through Fourth Quarter 2004, Cargill Salt – Alameda Facility, Alameda, California," dated November 7, 2005. The report, which was prepared by Crawford Consulting, Inc., presents the results of quarterly groundwater monitoring conducted at the site in 2004. During 2004, tetrachloroethene (PCE) was detected in groundwater at concentrations up to 4,100 micrograms per liter (μg/L) in well MW-2. The concentration of PCE detected in groundwater in two monitoring wells at the site exceeds Environmental Screening Levels (San Francisco Regional Water Quality Control Board February 2005) for indoor air vapor intrusion, drinking water toxicity, and estuary aquatic habitat goals. The concentration of PCE detected in soil at the site exceeds ESLs for direct exposure, vapor intrusion into buildings, and groundwater protection.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

Source of VOCs. The "Groundwater Monitoring Results, First through Fourth Quarter 2004, Cargill Salt – Alameda Facility, Alameda, California," dated November 7, 2005 indicates that, "the occurrence of VOCs in soil and groundwater at the site appears to be the result of a discharge or spill to surficial soils at a location near the rear property line at the southwestern corner of the property." Spills in an adjacent laundry room that could have drained onto the Cargill Salt property are identified as a possible source of the PCE. The report entitled, "Soil and Groundwater Investigations and Remedial activities, July 1993 – September 1994," dated July 31, 1995, prepared by Groundworks Environmental, Inc. indicates that, "soil to a depth of approximately 4 feet was determined to not be impacted," and was re-used as backfill in the excavation. Contaminated soil excavated from depths between 4 and 6 feet was apparently disposed off-site. The observation that soils down to a depth of 4 feet bgs were not impacted does not appear to be consistent with a surface spill. In the Work Plan requested below, please comment on the likely source of VOCs and use of the upper 4 feet of soils as backfill in the excavation.

- 2. Potential Indoor Air Vapor Intrusion. PCE is present in soil and groundwater at concentrations that exceed Environmental Screening Levels for potential indoor air intrusion (San Francisco Regional Water Quality Control Board February 2005). In order to further evaluate the potential for indoor air intrusion, we request that you conduct soil vapor sampling. Please present plans for soil vapor sampling in the Work Plan requested below.
- 3. Remediation of PCE Source. A small volume of soil (approximately 4 cubic yards) was excavated at the site in February 1994. The excavation extended to a depth of approximately 6 feet bgs but apparently the upper 4 feet of soil was used as backfill (see comment 1 above). Soil samples collected from soil boring AC-1, advanced in September 1994 outside the excavation, detected PCE at concentrations up to 31 milligrams per kilogram in soil at a depth of 10 feet bgs. Based on these data, impacted soil is present below the base of the excavation. In addition, elevated headspace readings were obtained in a soil boring north of the excavation. In the Work Plan requested below, please review these results and discuss the feasibility of additional soil removal or other remediation in the source area.
- Groundwater Monitoring. We request that you conduct groundwater sampling of the four monitoring wells on a semi-annual basis. Please include plans to conduct groundwater monitoring in the Work Plan requested below.
- Metals in Surface Soils. Five near surface soil samples were collected at the site on July 13, 1993 and analyzed for metals. Metals concentrations in three of the soil samples exceeded regulatory criteria. Impacted soils at these three locations were described in the report entitled, "Soil and Groundwater Investigations and Remedial activities, July 1993 September 1994," dated July 31, 1995as "casting sands," that were light and reddish-colored soils differing in appearance from the remaining surface soils at the site. Small excavations were performed at the three sampling locations where elevated concentrations of metals were detected. Following excavation of the surface soil, one confirmation soil sample was collected at each of the three small excavations. In the Work Plan requested below, please evaluate the adequacy of the surface soil sampling conducted to date to characterize metals concentrations in surface soils at the site given the high frequency of detection during the initial sampling event.
- 6. Geotracker EDF Submittals Please note that electronic submittal of data to the State Water Resources Control Board's (SWRCB) Geotracker website will be required for future reports. Pursuant to CCR Sections 2729 and 2729.1, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, all permanent monitoring points utilized to collected groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all SLIC analytical data post July 1, 2005, to the SWRCB's Geotracker database website in accordance with the above-cited regulation.

Ms. Teri Peterson August 24, 2006 Page 3

TECHNICAL REPORT REQUEST

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

November 10, 2006 – Work Plan

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Ms. Teri Peterson August 24, 2006 Page 4

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

Sincerely,

Jerry Wickham

Hazardous Materials Specialist

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cc: Mark Wheeler Crawford Consulting, Inc. 2 North First Street, 4th floor San Jose, CA 95113

> Donna Drogos, ACEH Jerry Wickham, ACEH

File



Bare-root trees planted on June 13, 2005 (4-ft rooted cuttings; total of 96 planted)



Growth at 12-1/2 weeks

Alameda tree pics.dsf 10/18/06



Project No. CS1605 Cargill Salt Dispensing Systems Division 2016 Clement Avenue, Alameda, California Figure 11. Hybrid Poplar Photographs



Cargill Salt - Alameda Facility

Site History: Site Characterization, Monitoring and Remediation Work

Prepared by Crawford Consulting, Inc., October 23, 2006

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July 1993	Cargill Salt initiates due diligence assessment of site conditions. Laboratory analysis of soil samples collected by Groundworks Environmental, Inc. (Groundworks) from 10 hand-augered borings to depths of approximately 5 feet indicated impact to soils in the southwest corner of the site by volatile organic compounds (VOCs), metals, and hydrocarbons (oil and grease). At boring ASB-1, tetrachlorothene (also known as perchloroethene or PCE) was detected at a concentration of 740,000 micrograms per kilogram (μ g/Kg), and 1,1-dichloroethene (1,1-DCE) was detected at 25,000 μ g/Kg.
	The lateral extent of chemical impact to soils by VOCs and oil and grease was limited to the area near boring ASB-1. The chemical impact to soil appeared to be the result of a discharge or spill to surficial soils in the area of boring ASB-1. The metals-impacted soils were associated with relatively small quantities of visually distinguishable, light-colored and red-colored casting sands discarded or spilled on surficial soils at three locations (borings ASB-1, ASB-2 and ASB-9 were targeted for these locations).
Sept. 30, 1993	Groundworks submits draft workplan Results of soil sampling and workplan for remedial activities, Alameda facility to Alameda County Dept. of Environmental Health (ACDEH), Attn. Larry Seto.
Oct. 4, 1993	Draft workplan accepted in letter to Cargill Salt from Larry Seto, ACDEH.
Oct. 19, 1993	Cargill Salt submits final workplan, Results of soil sampling and workplan for remedial activities, Alameda facility, prepared by Groundworks, to ACDEH.
October 1993	Groundwater samples collected from six borings hand augered to a depth of 10 feet; groundwater flow direction determined with groundwater elevation data from the borings. Laboratory analysis of the groundwater samples indicated impact by VOCs and oil and grease compounds. Highest concentrations of VOCs in groundwater detected at boring AGB-1, located adjacent to soil boring ASB-1. PCE detected at a concentration of 11,000 micrograms per liter (μ g/L).
	Surficial soils impacted by metals in visually distinguishable, light-colored and red-colored casting sands at borings ASB-2 and ASB-9 excavated manually and drummed for disposal. Extent of excavation determined in the field based on visual appearance of the soils. Extent of VOCs in soil further delineated by advancing three additional soil borings near ASB-1 and monitoring for VOC vapors in the boreholes.

Dec. 13, 1993	Madhulla Logan of ACDEH calls Mark Wheeler of Groundworks and indicates she has replaced Larry Seto as the ACDEH caseworker assigned to site.
February 1994	Continuing with work proposed in the October 1993 workplan, surficial soils impacted by metals in visually distinguishable, light-colored casting sands at ASB-1 excavated manually and drummed for disposal, and soil impacted by VOCs at the boring ASB-1 location excavated using a backhoe and placed in 1-cubic-yard containers for disposal. Approximately four cubic yards of soil excavated with the backhoe from the ASB-1 location.
September 1994	Additional characterization activities conducted to further assess the extent of VOCs in soil and groundwater at the site. Soil-coring rig used to sample soil to depths of 25 feet at the soil excavation area for characterization of the vertical extent of VOCs in saturated soil. Groundwater samples collected using a probe system to characterize the lateral and vertical extent of VOCs in groundwater. Groundwater samples collected upgradient, crossgradient, and downgradient of the site.
	Results indicate that the concentration of VOCs in saturated soil at the excavation area attenuates quickly with depth. VOCs were detected in soil samples collected at depths between 5 and 10 feet but were not detected in soil samples between depths of 11 and 25 feet. Low concentrations of PCE (0.6 to 4.2 μ g/L) were detected in groundwater downgradient of the site, indicating that PCE may have migrated off site. However, several VOCs were detected downgradient of the site that were not detected on site, indicating that the PCE and other VOCs detected downgradient of the site may be related to off-site sources.
July 31, 1995	Cargill Salt submits report to ACDEH: Soil and Groundwater Investigations and Remedial Activities, July 1993 – September 1994, Cargill Salt – Alameda Facility, Alameda, California, prepared by Groundworks.
	Report presents the procedures and results for the site investigations and remedial activities conducted to date at the Alameda facility. Additional work to confirm the groundwater results to date and further characterize the extent of PCE in groundwater is recommended.
Aug. 28, 1995	Mark Wheeler of Groundworks discusses project by phone with Madhulla Logan of ACDEH, gives overview of what is presented in the July report. Ms. Logan indicates she will review the report and call with any questions.
June 24, 1996	Mark Wheeler of Groundworks leaves voicemail with Madhulla Logan of ACDEH to ask if she has reviewed the report, stating that Cargill Salt is interested in moving ahead on the project.

Sant 16 1007	Mark Wheeler of Groundworks leaves voicemail with Madhulla Logan of			
Sept. 16, 1997	Mark Wheeler of Groundworks leaves voicemail with Madhulla Logan of ACDEH: Cargill Salt is interested in moving ahead with the proposed Alameda facility work, would like to get County feedback before conducting work.			
June 9, 1998	In letter to Madhulla Logan of ACDEH, Barbara Ransom of Cargill Salt requests response indicating whether or not ACDEH plans to comment on the recommendations presented in the 1995 report before Cargill Salt continues with remedial activities.			
June 17, 1998	Mark Wheeler of Groundworks leaves voicemail with Madhulla Logan of ACDEH repeating request for feedback on additional work to be conducted at the Cargill Salt Alameda facility.			
June 23, 1998	Madhulla Logan of ACDEH calls Mark Wheeler of Groundworks to discuss Cargill Salt Alameda facility case. Ms. Logan asks if the report contains a workplan for additional work. Mr. Wheeler responds no, just recommendations. Ms. Logan indicates she will review the case files within a few weeks and that if she has comments on the proposed work, she will include those in a letter. If additional work is to be done at the site, she will expect submittal of a workplan for ACDEH approval prior to conducting the work.			
April 16, 1999	Mark Wheeler (now of Crawford Consulting, Inc.) reviews the case in a phone call with Eva Chu of Alameda County Health Care Services (ACHCS), who has replaced Madhulla Logan as case worker for the site. Ms. Chu has the 1995 report. After Mr. Wheeler reviews the key findings of the report, Ms. Chu discusses her initial concerns for additional work at the site and indicates she will write a letter to Cargill Salt requesting submittal of a workplan.			
May 7, 1999	Letter from Eva Chu of ACHCS to Barbara Ransom of Cargill Salt indicates she has completed a review of the case file. "Previous use of the site has resulted in the release of volatile organic compounds (VOCs) and metals to the subsurface. The extent of VOC contamination if soil and groundwater has been fairly well defined. Soil contaminated with metals has been excavated."			
	The letter requests installation of on-site and off-site permanent groundwater monitoring wells to monitor VOCs in groundwater. Monitoring frequency is not specified. Letter requests submittal of a workplan by July 12, 1999.			

	y			
July 7, 1999	Cargill Salt submits July 7, 1999 Workplan for additional groundwater investigation activities, Cargill Salt – Alameda facility prepared by Crawford Consulting, Inc. to Eva Chu at ACHCS. A two-phase approach is proposed. First, collect depth-discrete samples along two transects to profile VOC concentrations in groundwater. Then, after using the profile results to target optimal locations and screen intervals for groundwater monitoring wells, install three groundwater monitoring wells in the second phase of field work. Monitoring frequency not specified.			
July 9, 1999	Letter from Eva Chu at ACHCS to Barbara Ransom of Cargill Salt accepts work as proposed in the July 7, 1999 workplan and requests that field work commence by September 13, 1999.			
August 1999	Plume characterization program involving collection of depth-discrete groundwater along two transects completed by Conor Pacific/EFW under supervision by Crawford Consulting, Inc.			
December 1999	After receiving concurrence from Eva Chu of ACHCS on proposed locations for monitoring well installation, monitoring wells MW-1 through MW-3 installed and sampled by Conor Pacific/EFW under supervision by Crawford Consulting, Inc.			
Jan. 31, 2000	Cargill Salt submits January 31, 2000 report Groundwater Characterization and Monitoring Well Installation, Cargill Salt - Alameda Facility, Alameda, California, prepared Crawford Consulting, Inc. and Conor Pacific/EFW to Eva Chu at ACHCS.			
	Report recommends quarterly groundwater monitoring to confirm results, and includes recommendations for additional work to further delineate the lateral and downgradient extent of VOCs, to obtain subsurface hydraulic characteristics, and to collect natural attenuation information.			
March 2000	Quarterly groundwater monitoring program at Alameda site initiated by Cargill Salt. Groundwater levels measured and groundwater samples collected on a quarterly basis. Results reported annually to ACHCS.			
April 19, 2001	Letter from Eva Chu at ACHCS, Offsite Investigation at 2016 Clement Avenue, Alameda, CA, to Barbara Ransom of Cargill Salt indicates concurrence with Crawford Consulting, Inc.'s recommendation in the April 11, 2001 Groundwater Monitoring Results, First through Fourth Quarter 2000 report that additional investigation be conducted to delineate the offsite extent of VOCs in groundwater. Letter requests submittal of a workplan by June 21, 2001.			

June 18, 2001	Cargill Salt submits June 18, 2001 Workplan for Off-Site Characterization, Cargill Salt Alameda Facility prepared by Conor Pacific/EFW to Eva Chu at ACHCS.					
July 5, 2001	Letter from Eva Chu at ACHCS, Work Plan Approval for 2016 Clement Avenue, Alameda, CA, to Barbara Ransom of Cargill Salt accepts work as proposed in the June 2001 workplan.					
November 2001 - January 2002	Conor Pacific conducts off-site soil and groundwater sampling, installs off-s downgradient monitoring well MW-4, samples wells, and performs hydrauli testing.					
August 22, 2002	Cargill Salt submits August 21, 2002 report, Off-Site Groundwater Characterization, Cargill Salt - Alameda Facility, Alameda, California, prepared by Conor Pacific, to Eva Chu at ACHCS.					
	Conor Pacific recommends that Cargill (1) continue to monitor groundwater quality, flow direction and gradient, and (2) evaluate potential remedial action alternatives for the site.					
2001 - 2006	Cargill Salt continues quarterly monitoring program with annual reporting of results to ACHCS.					
2002 – 2005	Cargill Salt reviews remedial alternatives for the site.					
March 23, 2005	Mark Wheeler of Crawford Consulting, Inc. leaves voicemail with Eva Chu at ACHCS regarding site plans. Bob Schultz of ACHCS returns call and explains that Eva Chu has transferred to a different group and that he is the new caseworker.					
	Mr. Wheeler reviews plans by Cargill Salt to try phytoremediation with hybrid poplars to reduce VOC concentrations in groundwater at the site. Mr. Schultz agrees that submittal of a workplan would not be required and indicates that a status update about the tree program should be included in the next monitoring report.					
June 13, 2005	Phytoremediation project implemented at site. Project involved planting 96, 4-foot-tall, bare-root trees in an grid of 24 rows. Rows are generally 6 feet apart with trees on 7-foot-centers on each row. Drip irrigation and monthly monitoring and maintenance program initiated.					
August 24, 2006	Letter from Jerry Wickham, ACHCS caseworker currently assigned to case, to Teri Peterson at Cargill Salt. Letter requests submittal of a workplan addressing technical comments in the letter by November 10, 2006.					





DAVID J. KEARS, Agency Director

AGENCY

May 25, 2006

Ms. Barbara Ransom Cargill Salt Company 7220 Central Avenue Newark, CA 94560-4205 **ENVIRONMENTAL HEALTH SERVICES**

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

Subject: SLIC Cas Cargill Salt, 2016 Clement Avenue, Alameda, CA

Dear Ms. Ransom:

Our records indicate that the current balance on the above-referenced SLIC oversight account is a negative \$1,381.50. In order to continue to provide regulatory oversight, we are requesting the submittal of a check made payable to Alameda County Environmental Health in the amount of \$4,500.00. Please send your check to the attention of our Finance Department.

This deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, an additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project is being debited at the Ordinance specified rate, currently \$166.00 per hour.

Please write "SLIC" (the type of project), the site address, and the AR# 0306005 on your check.

If you have any questions, please contact Jerry Wickham at (510) 567-6791.

Sincerely,

Division Chief

CC:

D. Drogos, J. Jacobs, Jerry Wickham

Chu, Eva, Env. Health

From: Sent:

Martha J. Watson [mjw@efwi.com] Friday, October 11, 2002 12:37 PM

To:

EChu@co.alameda.ca.us

Cc: Subject: mark@crawfordconsulting.com; Teri_Peterson@cargill.com

Cargill Salt at 2016 Clement, Alameda

Hi eva,

This email is to follow-up on our telephone conversations regarding the potential for utilities in Clement Avenue to act as conduits for migration of volatile organic compounds (VOCs) detected in groundwater at the Cargill Alameda Facility, 2016 Clement Avenue.

Based on information provided by the Public Works Department, City of Alameda, and our site characterization, these utilities have little effect on VOC migration for several reasons. First, all the utilities are built within fill or bedding material (silty sand) of similar hydraulic characteristics of the surrounding native material (combination of fine sand and silty sand). The near surface electrical conduits, which intersect the groundwater table, are encased in concrete. Both the sanitary and storm sewers are built entirely below the groundwater table. The pumping stations for these systems are located to the southeast. However, this will have little, if any, effect on groundwater flow, because both the sanitary and storm sewer systems are lined to prevent the infiltration of groundwater and are on a routine maintenance schedule. Finally, site characterization data indicates that the core of the VOC plume is at an elevation below that of the utilities in Clement Avenue.

If you have any further questions, please let me know.

Best Regards...

Martha J. Watson Principal Environmental Engineer Conor Pacific 2580 Wyandotte St., Suite G. Mountain View, CA 94303

email: mjw@efwi.com

phone: 650/386-3828 x 224

fax: 650/386-3815

http://www.conorpacific.com

Alameda County Environmental Health

1131 Harbor Bay Pkwy., #250 Alameda CA 94502-6577 Telephone (510) 567-6700 FAX (510) 337-9335

FACSIMILE COVER SHEET

TO:	Barbara	Ransan Cargill Sal	太
FROM:	Evach	(510) 567-6762	
DATE:	7/25/01		
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to facilo	he access to	adjacent property.	
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S 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

CO0000103

July 3, 2001

Ms. Barbara Ransom Cargill Salt 7220 Central Ave Newark, CA 94560-4206

RE: Work Plan Approval for 2016 Clement Avenue, Alameda, CA

Dear Ms. Ransom:

I have completed review of Conor Pacific's June 2001 Workplan for Off-Site Characterization prepared for the above referenced site. Conor Pacific proposes to advance six soil borings on the residential property and five soil borings along Clement Avenue. Soil and grab groundwater samples will be collected to further characterize the VOC plume. Based on the groundwater analytical results, a groundwater monitoring will be installed. The proposed workplan is acceptable. Field work should commence within 90 days of the date of this letter. Please provide at least 72 hours advance notice of field activities.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

email: Mark Wheeler

CARGILL SALT DIVISION

7220 Central Ave. Newark, CA 94560-4206 510/797-1820 1-800-321-1458 Fax: 510/790-8189

JUN 2 2 2001

June 19, 2001

Alameda County Dept. of Environmental Health Hazardous Materials Division 1131 Harbor Bay Parkway Alameda, California 94502-6577

Attn: eva chu

RE: Workplan for Off-Site Characterization, Cargill Salt - Alameda Facility, Alameda, California

We would like to continue our remedial investigation activities at the Cargill Salt Dispensing Systems Division facility located at 2016 Clement Avenue in Alameda, California. As requested in your letter of April 19, 2001, a workplan to delineate the extent of volatile organic compounds (VOCs) in groundwater offsite, among other tasks, is attached. The workplan was prepared by Conor Pacific working with Mark Wheeler of Crawford Consulting, Inc.

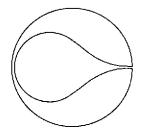
If you have any questions concerning this workplan, please do not hesitate to call me at (510) 790-8182, or Mark Wheeler at (408) 287-9934. If you would like to meet to review the proposed activities described in the attached workplan, please let me know.

Sincerely,

Barbara N. Ransom

Environmental Affairs Manager

Mah Zu



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

CO0000103

April 19, 2001

Ms. Barbara Ransom Cargill Salt 7220 Central Avenue Newark, CA 94560-4206

RE: Offsite Investigation at 2016 Clement Avenue, Alameda, CA

Dear Ms. Ransom:

I have completed review of Crawford Consulting, Inc.'s (Crawford) April 2001 report, Groundwater Monitroing Results First through Fourth Quarter 2000, prepared for the above referenced site. Four consecutive quarterly groundwater monitoring results were presented in the report. Elevate volatile organic compounds (VOCs) were detected in wells MW-1 and MW-2.

Crawford recommended that additional investigations be conducted to delineate the extent of VOCs in groundwater offsite, among other tasks. This agency concurs with Crawford's recommendations. Please submit a workplan for conducting additional investigations within 60 days of the date of this letter, or by June 21, 2001.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

email: Mark Wheeler

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

StID 3835

February 8, 2000

Ms. Barbara Ransom Cargill Salt 7220 Central Avenue Newark, CA 94560-4206

RE:

QMR for 2016 Clement Avenue, Alameda, CA

Dear Ms. Ransom:

I have completed review of Crawford Consulting Inc.'s January 2000 report, Groundwater Characterization and Monitoring Well Installation, prepared for the above referenced site. That report summarized activities during the collection of depth-discrete groundwater samples from two transects positioned across the vacant lot of the facility and the installation of three groundwater monitoring wells.

Investigations conducted to date reveal that the plume has migrated offsite to the northwest (towards residential properties) and northeast (across Clement Avenue). At this time, quarterly monitoring of the onsite wells should be initiated. Quarterly monitoring reports (QMRs) are due 60 days upon completion of field activities. A conduit study should also be prepared to determine if utilities beneath Clement Avenue may act as preferential pathways for the migration of VOCs in groundwater.

After another round of groundwater monitoring, offsite wells may be required near the fence line to the northwest and downgradient across Clement Avenue.

If you have any questions, I can be reached at (510) 567-6762.

ova obu

Hazardous Materials Specialist

email: Mark Wheeler (mark@crawfordconsulting.com)

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cargill-4

AGENCY



DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES

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

StID 3835

February 8, 2000

Ms. Barbara Ransom Cargill Salt 7220 Central Avenue Newark, CA 94560-4206

RE:

QMR for 2016 Clement Avenue, Alameda, CA

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Investigations conducted to date reveal that the plume has migrated offsite to the northwest (towards residential properties) and northeast (across Clement Avenue). At this time, quarterly monitoring of the onsite wells should be initiated. Quarterly monitoring reports (QMRs) are due 60 days upon completion of field activities. A conduit study should also be prepared to determine if utilities beneath Clement Avenue may act as preferential pathways for the migration of VOCs in groundwater.

After another round of groundwater monitoring, offsite wells may be required near the fence line to the northwest and downgradient across Clement Avenue.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

email: Mark Wheeler (mark@crawfordconsulting.com)



ERVERORMENTAL PROTECTION

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TRANSMITTAL

February 4, 2000 Project No. CS1605

To:

Alameda County Environmental Health Services **Environmental Protection** Attn. eva chu 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

Please find attached one (1) copy of the following report:

Groundwater Characterization and Monitoring Well Installation, Cargill Salt - Alameda Facility, Alameda, California, prepared for Cargill Salt by Crawford Consulting, Inc. and Conor Pacific/EFW, January 31, 2000

Comment: Barbara Ransom at Cargill Salt requested that we forward this report directly to you. If you have any questions, please call me at the number below, or Barbara Ransom at 510-790-8182.

Sent by:

Priority Mail

From:

Mark C. Wheeler

marke crawtord consulting, com.

cc:

Barbara Ransom, Cargill Salt

tranchu01.doc

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

StID 3835

July 9, 1999

Ms. Barbara Ransom Cargill Salt 7220 Central Avenue Newark, CA 94560-4206

RE: Work Plan Approval for 2016 Clement Avenue, Alameda, CA

Dear Ms. Ransom:

I have completed review of Crawford Consulting, Inc.'s (Crawford) July 1999 Workplan for Groundwater Characterization and Monitoring Well Installation prepared for the above referenced site. Crawford proposed to conduct additional subsurface investigations in two phases. In the first phase, chlorinated volatile organic compounds (HVOCs) in groundwater will be profiled along two transects. Grab groundwater samples will be collected from 6.5, 11.5, 16.5, and 22.5 feet below grade surface. Data collected from this investigation will be used to determine the best location and screen interval for the three proposed groundwater monitoring wells (second phase).

The work plan proposal is acceptable. Field work should commence within 60 days of the date of this letter, or **by September 13, 1999.** Please notify this office at least 72 hours prior to the start of field activities.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

c: Mark Wheeler

Crawford Consulting

111 N. Market Street, Suite 634

San Jose, CA 95113-1100

AGENCY



DAVID J. KEARS, Agency Director

StID 3835

May 7, 1999

Ms. Barbara Ransom Cargill Salt 7220 Central Avenue Newark, CA 94560 **ENVIRONMENTAL HEALTH SERVICES**

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

RE:

Groundwater Monitoring Well Installation at 2016 Clement Avenue,

Alameda, CA

Dear Ms. Ransom:

I have completed review of the case file for the above referenced site. Previous use of the site has resulted in the release of volatile organic compounds (VOCs) and metals to the subsurface. The extent of VOC contamination in soil and groundwater has been fairly well defined. Soil contaminated with metals has been excavated.

At this time permanent groundwater monitoring wells are required at the site, as well as off-site, to track the contaminant plume. A workplan for this phase of the investigation is due within 60 days of the date of this letter, or by July 12, 1999.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

c:

Mark Wheeler Crawford Consulting, Inc 111 N Market Street, Suite 634 San Jose, CA 95113-1100 AGENCY





ENVIRONMENTAL HEALTH SERVICES

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

StID 3835

April 16, 1999

Ms. Barbara Ransom Cargill Salt 7220 Central Avenue Newark, CA 94560

RE:

Project #2330A, Add-on

at 2016 Clement Avenue, Alameda, CA

Dear Ms. Ransom:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$2,500.00, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested, or any unused monies will be refunded to you or your designee.

The deposit/refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$100 per hour.

Please be sure to write the following identifying information on your check:

project #2330/ Stid #3835 type of project (Mitigation, add-on), and site address (2016 Clement Street, Alameda, CA)

If you have any questions, please contact me at (510) 567-6762.

eva chu

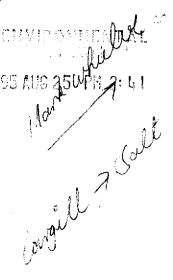
Hazardous Materials Specialist

cargill-1

CARGILL SALT DIVISION

7220 Central Ave. Newark, CA 94560-4206 510/797-1820 1-800-321-1458 Fax: 510/790-8189

August 21, 1995



Madhulla Logan Alameda County Department of Environmental Health Hazardous Materials Division 80 Swan Way, Room 200 Oakland, CA 94621

Dear Ms. Logan:

Please find attached a copy of the report:

"Soil & Groundwater Investigation and Remedial Activities July 1993 - September 1994) Cargill Salt - Alameda Facility Alameda, California"

This report was prepared by Groundworks Environmental, Inc.

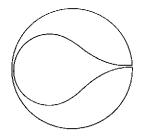
We would be happy to meet with you to discuss the report and our next steps. Please let me know what time would be convenient.

Sincerely,

Barbara N. Ransom

Environmental Manager

cc: CA Regional Water Quality Control Board San Francisco Bay Region



RAFAT A. SHAHID, Assistant Agency Director

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

October 4, 1993

Ms. Barbara Ransom Cargill Salt 7220 Central Avenue Newark, CA 94560-4206

RE: Cargill Salt, 2016 Clement Avenue, Alameda, CA

Dear Ms. Ransom:

I have reviewed your "draft" Workplan for Remedial Activites dated September 30, 1993 for the above site. The workplan is acceptable, however, I would like more information on the following:

- 1. How were the sampling locations determined for the sampling that was performed on July 13, 1993?
- 2. Is the groundwater sample that will be taken from a bore hole near ASB-1 in the verified down-gradient direction from ASB-1?

Please address these issues in your final workplan.

Our office charges \$75.00 per hour for our services. Please submit a deposit/refund check to this office for \$714.00, made payable to the County of Alameda.

If you have any questions, please contact me or Kevin Tinsley at (510) 271-4320.

Xarry Seto

Sr. Hazardous Materials Specialist

cc: Ed Howell, Chief, Hazardous Materials Kevin Tinsley, Hazardous Materials Mark Wheeler, Groundworks Environmental, Inc.

Groundworks Environmental, I In 4H 8: 57

TRANSMITTAL

*3*535

October 8, 1993 Project CS1602

To:

Alameda County Dept. of Environmental Health, Hazardous Materials Division Attn. Larry Seto 80 Swan Way, Room 200 Oakland, CA 94621

Please find enclosed:

1 check: Check from Cargill Salt for Alameda County in the amount of \$483.00.

Comments:

Cargill Salt requested that we forward this "deposit/refund" check for oversight fees related to remedial activities at the Cargill Salt Dispensing Systems Divisions facility, at 2016 Clement Avenue, Alameda, California.

The check amount is per your phone call with me on August 19, 1993.

Sent by: Priority Mail

From:

Mark Wheeler

cc: Barbara Ransom, Cargill Salt

Nake Wheely

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