

August 23, 1989

Mr. Dennis Byrne
Alameda County Health Care Services
Hazardous Materials Program
80 Swan Way, Room 200
Oakland, California 94621

Subject: Proposal to Terminate Groundwater Extraction &
Treatment at 5800 Christie Street,
Emeryville, California

Dear Mr. Byrne:

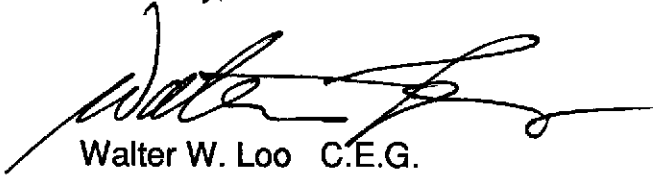
This letter presents Croley & Herring Investment Company's intention to terminate the groundwater extraction and treatment activity at the subject site. A waste water discharge permit was granted by the EBMUD on August 2, 1989 for the subject activity(see attachment). During August 18-19, 1989, the groundwater extraction and treatment system was installed and tested.

The extraction well EW-1 yielded a total of less than 10 gallons of groundwater. A bailer test was performed at the well and the transmissivity value of the shallow groundwater body to a depth of 20 feet is less than 10 gallons per day per foot(gpd/ft). Besides the low yield nature of the Bay Mud, the total dissolved solids (TDS) of the groundwater was analysed at about 15,000 parts per million(ppm). The laboratory analysis result is attached. Water containing more than 10,000 ppm of TDS is generally considered to be non-useable. At the subject site, we have both low yield Bay Mud material and high TDS. We think the proposed request to terminate the groundwater extraction treatment system is reasonable. We still will be committed to the quarterly groundwater monitoring program for wells EW-1, MW-2 and MW-3.

ALAMEDA COUNTY
DEPT. OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS

We look forward to discuss with you about this request when you come back from vacation(8/29/89). Thank you again for your prompt attention on this case.

Sincerely,


A handwritten signature in black ink, appearing to read 'Walter W. Loo', with a long horizontal flourish extending to the right.

Walter W. Loo C.E.G.
Director of Remediation

Attachments(2)

AWD Tech
Walter Zoo
FAST BAY MUNICIPAL UTILITY DISTRICT

2081-15th St.
SF CA 94110


EBMUD RECEIVED
AUG 07 1989

CERTIFIED MAIL
(Return Receipt Requested)

August 2, 1989

Mr. Richard Herring
Croley and Herring Investment Company
1311 63rd Street
Emeryville, CA 94608

Dear Herring:

Re: Wastewater Discharge Permit (Account No. 001-00005)

The subject Permit for Croley and Herring Investment Company, effective August 2, 1989, through August 1, 1990 is enclosed for your information and records.

Please note the following Terms and Conditions:

Prior to commencement of discharge to the sewer, a sample must be collected from the effluent, analyzed, and the results reported to EBMUD. Upon approval from the Source Control Division, the effluent may be discharged to the sewer. This initial sample must be analyzed for EPA 624, EPA 625 and priority pollutant metals.

Croley and Herring Investment Company shall submit bimonthly reports that include the following data from the prior two month period:

- o A summary of the EPA 601 and 602 analyses for samples collected from the treatment unit influent, intermediate and final effluent sample points.
- o The volume of groundwater treated.
- o Any changes to or maintenance of the treatment unit that may have occurred.

These reports are due September 10, 1989, November 10, 1989, January 10, 1990, March 10, 1990, May 10, 1990 and July 10, 1990.



BOARD OF DIRECTORS: SANFORD M. SKAGGS, President; KENNETH H. SIMMONS, Vice President;
HELEN SUPKE, JOHN M. GIOIA, WALTER P. McLEAL, NANCY J. KADEL, MARY C. WARREN

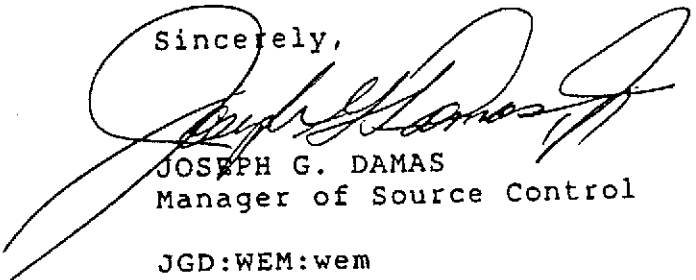
Mr. Richard Herring
August 2, 1989
Page 2

The Self-monitoring requirements for your facility are listed on Page 3 of the Permit. Please note that "if the test results indicate a violation of any discharge limitation, the District shall be notified within 24 hours from the time the violation was discovered."

Croley and Herring Investment Company shall report to the Source Control Division any changes, either permanent or temporary, to the premise or operation that significantly affect either the volume or quality of wastewater discharged or deviate from the Terms and Conditions under which this Permit is granted.

If you have any questions regarding this matter, please contact William Meckel of the Source Control Division at 465-3700, extension 128.

Sincerely,



JOSEPH G. DAMAS
Manager of Source Control

JGD:WEM:wem

Enclosures



Wastewater Discharge Permit Application

PERMIT NUMBER
001-00005

APPLICANT BUSINESS NAME <u>Croley and Herring Investment Co.</u>	
ADDRESS OF PREMISE DISCHARGING WASTEWATER <u>5800 Christie</u> STREET ADDRESS <u>EMERYVILLE CA. 94608</u> CITY ZIP CODE	BUSINESS MAILING ADDRESS <u>1311 63rd Street</u> STREET ADDRESS <u>EMERYVILLE CA. 94608</u> CITY ZIP CODE
CHIEF EXECUTIVE OFFICER <u>Richard D. Herring</u> NAME <u>1311 63rd Street</u> STREET ADDRESS	<u>Partner, General</u> TITLE <u>EMERYVILLE CA 94608</u> CITY ZIP CODE
PERSON TO BE CONTACTED ABOUT THIS APPLICATION <u>S/A ABOVE OR Stephen G. Croley</u> NAME <u>Gen. Partner 652-1276</u> TITLE PHONE	PERSON TO BE CONTACTED IN EVENT OF EMERGENCY <u>R.D. Herring or S.G. Croley</u> NAME <u>652-1276</u> <u>R.D.H 376-3473</u> DAY PHONE NIGHT PHONE <u>SGC 283-2314</u>

DOCUMENTATION TO BE RETURNED WITH THE PERMIT APPLICATION:

<input checked="" type="checkbox"/> PROCESS DESCRIPTION	<input checked="" type="checkbox"/> DESCRIPTION OF PRETREATMENT SYSTEM
<input checked="" type="checkbox"/> WATER BALANCE CALCULATIONS	<input checked="" type="checkbox"/> SELF-MONITORING METHOD
<input checked="" type="checkbox"/> WASTEWATER STRENGTH DATA BASE	<input type="checkbox"/> SPILL PREVENTION AND CONTAINMENT PLAN
<input checked="" type="checkbox"/> SCHEMATIC FLOW DIAGRAM	<input checked="" type="checkbox"/> A LIST OF ALL ENVIRONMENTAL PERMITS (e.g. Air, Hazardous Waste)
<input checked="" type="checkbox"/> BUILDING LAYOUT DIAGRAM	<input checked="" type="checkbox"/> OTHER <u>Site History</u> SPECIFY

PROVISIONS

Applicant will comply with the District Wastewater Control Ordinance and all applicable rules and regulations.

Applicant will report to EBMUD, Wastewater Department any changes, permanent or temporary, to the premise or operations that significantly change the quality or volume of the wastewater discharge or deviation from the terms and conditions under which this permit is granted.

RECEIVED

JUL 6 1989

CERTIFICATION

I have personally examined ~~and am~~ familiar with the information submitted in this document and attachments. To the best of my knowledge the submitted information is true, accurate and complete.

TYPE OR PRINT Croley and Herring Inv. Co.

Name R.D. HERRING

Title Partner

R.D. Herring
SIGNATURE

7/6/89
DATE



Terms and Conditions Wastewater Discharge Permit

Croley and Herring Investment Company
Account No. 001-00005
Page No. 1

GENERAL CONDITIONS

This Wastewater Discharge Permit is issued for a specific operation and is not assignable to another user or transferable to any location. Sale of a business shall obligate the purchaser to seek prior written approval of the District for continued discharge to the sewerage system.

Croley and Herring Investment Company shall retain for no less than three (3) years following the date of expiration, this Permit, monitoring reports and other documents pertinent to this Permit.

Croley and Herring Investment Company shall not increase the use of process water, or in any other way dilute the process discharge as a substitute for treatment, to achieve compliance. The District may impose mass limits where appropriate.

Croley and Herring Investment Company shall not bypass (divert wastestreams from the pretreatment system) and the District may take enforcement action unless:

1. The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage.
2. There were no feasible alternatives to the bypass (i.e. use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal downtime periods).
3. Proper notification, as outlined below, is submitted and approved by the District:
 - o A written notice shall be submitted to the District of an anticipated bypass at least 10 days prior to the date of bypass.
 - o A verbal report shall be made to the District within 24 hours from the time Croley and Herring Investment Company becomes aware of an unanticipated bypass. A written report shall be submitted within 5 working days.



Terms and Conditions Wastewater Discharge Permit

Croley and Herring Investment Company
Account No. 001-00005
Page No. 2

COMPLIANCE REPORTING CONDITIONS

Prior to discharging to the sewer, a sample collected from the effluent shall be analyzed and the results reported to EBMUD. Upon oral approval from the Source Control Division, the effluent may be discharged to the sewer. This initial sample must be analyzed for EPA 624, EPA 625 and priority pollutant metals.

Croley and Herring Investment Company shall submit bimonthly reports that include the following data from the prior two month period:

- a) A summary of the EPA 601 and 602 analyses for samples collected from the treatment unit influent, intermediate and final effluent sample points.
- b) The volume of groundwater treated.
- c) Any changes to or maintenance of the treatment unit that may have occurred.

These reports are due September 10, 1989, November 10, 1989, January 10, 1989, March 10, 1990, May 10, 1990 and July 10, 1990.



Terms and Conditions Wastewater Discharge Permit

Croley and Herring Investment Company
Account No. 001-00005
Page No. 3

WASTEWATER DISCHARGE LIMITATIONS

REGULATED PARAMETER	DAILY MAXIMUM, mg/L
Arsenic	2.0
Cadmium	1.0
Chlorinated Hydrocarbons (total identifiable)	0.5
Chromium (total)	2.0
Copper	5.0
Cyanide	5.0
Iron	100.0
Lead	2.0
Mercury	0.05
Nickel	5.0
Oil and Grease	250.0
Phenolic compounds	100.0
Silver	1.0
Zinc	5.0
pH (not less than)	5.5 S.U.
Temperature	150°F
* Benzene	0.003
* Toluene	0.031
* Ethylbenzene	0.005
* Xylenes	0.042
* Trichloroethene	0.003
* Carbon tetrachloride	0.003
* 1,1,1-Trichloroethane	0.006

* These limits reflect recent background levels at the EBMUD treatment plant influent and are achievable using Best Available Technology.



Terms and Conditions Wastewater Discharge Permit

Croley and Herring Investment Company
Account No. 001-00005
Page No. 4

SELF-MONITORING REPORTING REQUIREMENTS

Croley and Herring Investment Company shall obtain representative samples of the wastewater discharge. Sampling shall be performed according to the frequency and method outlined below. A signed report shall be submitted to EBMUD within 30 days following the date of sampling which includes the results of the sampling. The Self-Monitoring Report shall include the date, time, laboratory results, chain-of-custody and the processes in operation at the time of sampling.

IF THE TEST RESULTS INDICATE A VIOLATION OF ANY DISCHARGE LIMITATION, THE DISTRICT SHALL BE NOTIFIED WITHIN 24 HOURS FROM THE TIME THE VIOLATION WAS DISCOVERED. A REPEAT ANALYSIS MAY BE REQUIRED.

A written statement indicating the cause of the violation and the timing for corrective action(s) necessary to prevent recurrence shall be submitted with the test results. A Violation Follow-up Fee will be assessed for test results exceeding discharge limitations.

SAMPLING LOCATION:

Samples are to be collected from sampling points representing the influent, intermediate and final effluent of the carbon treatment stages.

SAMPLING FREQUENCY (samples per week per sample point)

Analysis	Weeks	Weeks	Weeks
	1-3	4-8	9->
EPA 601	3	1	1/2 Weeks
EPA 602	3	1	1/2 Weeks

Prior to discharging to the sewer, a sample collected from the effluent shall be analyzed and the results reported to EBMUD. Upon oral approval from the Source Control Division, the effluent may be discharged to the sewer. This initial sample must be analyzed for EPA 624, EPA 625 and priority pollutant metals.

SAMPLING METHOD:

All samples must be obtained using containers, collection methods, preservation techniques, holding times and analytical methods as specified in EPA SW-846.

SD-30.3 • 6/86



Terms and Conditions Wastewater Discharge Permit

Croley and Herring Investment Company
Account No. 001-0000#5
Page 5

MONITORING and TESTING CHARGES

Total EBMUD Inspections Per Year 6 @ \$415.00 each = \$ 2490.00 / year

Total Analyses Per Year:

Parameter	Tests per year	Charge per test	Total Charge per year
pH	6	5.95	35.70
TSS	4	15.53	62.12
CODF	4	25.45	101.80
Cyanide (Total)	1	108.40	108.40
EPA 624	6	330.50	1983.00
EPA 625	1	608.12	608.12
Metals	1	59.49	59.49
Metals digestion	1	35.69	35.69

Monitoring and Testing Charge = \$ 5484.32 / year

= \$ 457.03 / month



Terms and Conditions Wastewater Discharge Permit

Croley and Herring Investment Company
Account No. 001-000045
Page No. 6

FEES AND WASTEWATER CHARGES

The following fees and charges are due when billed by the District:

Permit Fee	\$1,800.00
Estimated Monthly Monitoring Charges	\$ 457.03

Actual Monitoring and Testing Charges will be charged as per schedule on Page 4.

WASTEWATER DISPOSAL SERVICE CHARGE

Wastewater strength and the applicable capacity fee will be determined by EBMUD during the term of this Permit. The average wastewater strength will be applied to 100% of the volume discharged. The capacity fee will be prorated over 3 years.

This Permit may be amended to include changes to rates and charges which may be established by the District during the term of this Permit.

AVERAGE WASTEWATER DISCHARGE*



LAST 12 MONTHS	PRECEDING 12-24 MONTHS
0	0

*Gallons per calendar day.

AUTHORIZATION

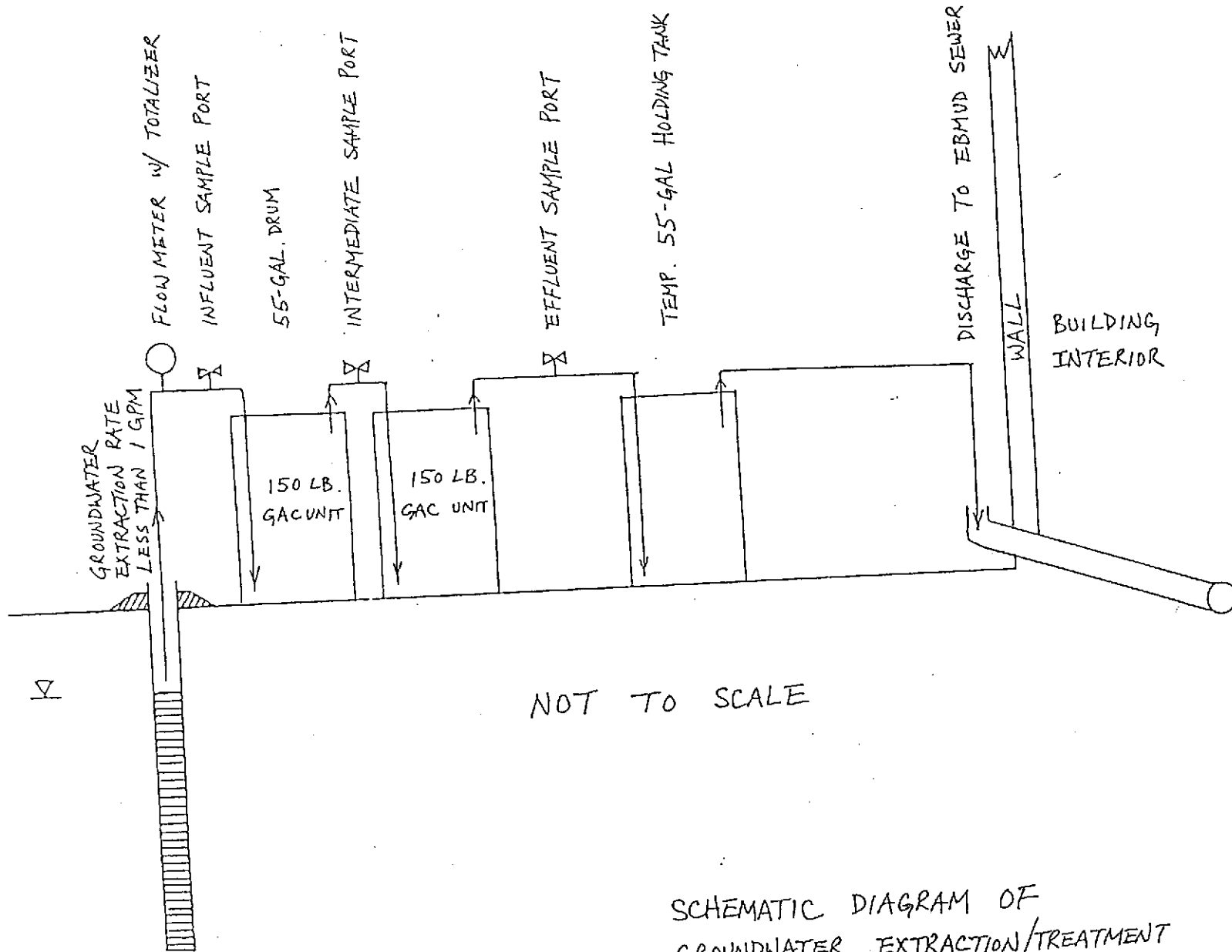
The above named Applicant is hereby authorized to discharge wastewater to the community sewer, subject to said Applicant's compliance with the EBMUD Wastewater Control Ordinance, compliance conditions, reporting requirements and billing conditions.

Effective Date: August 2, 1989

Expiration Date: August 1, 1990

Arthur J. Finking 8/1/89
 MANAGER, WASTEWATER DEPARTMENT DATE

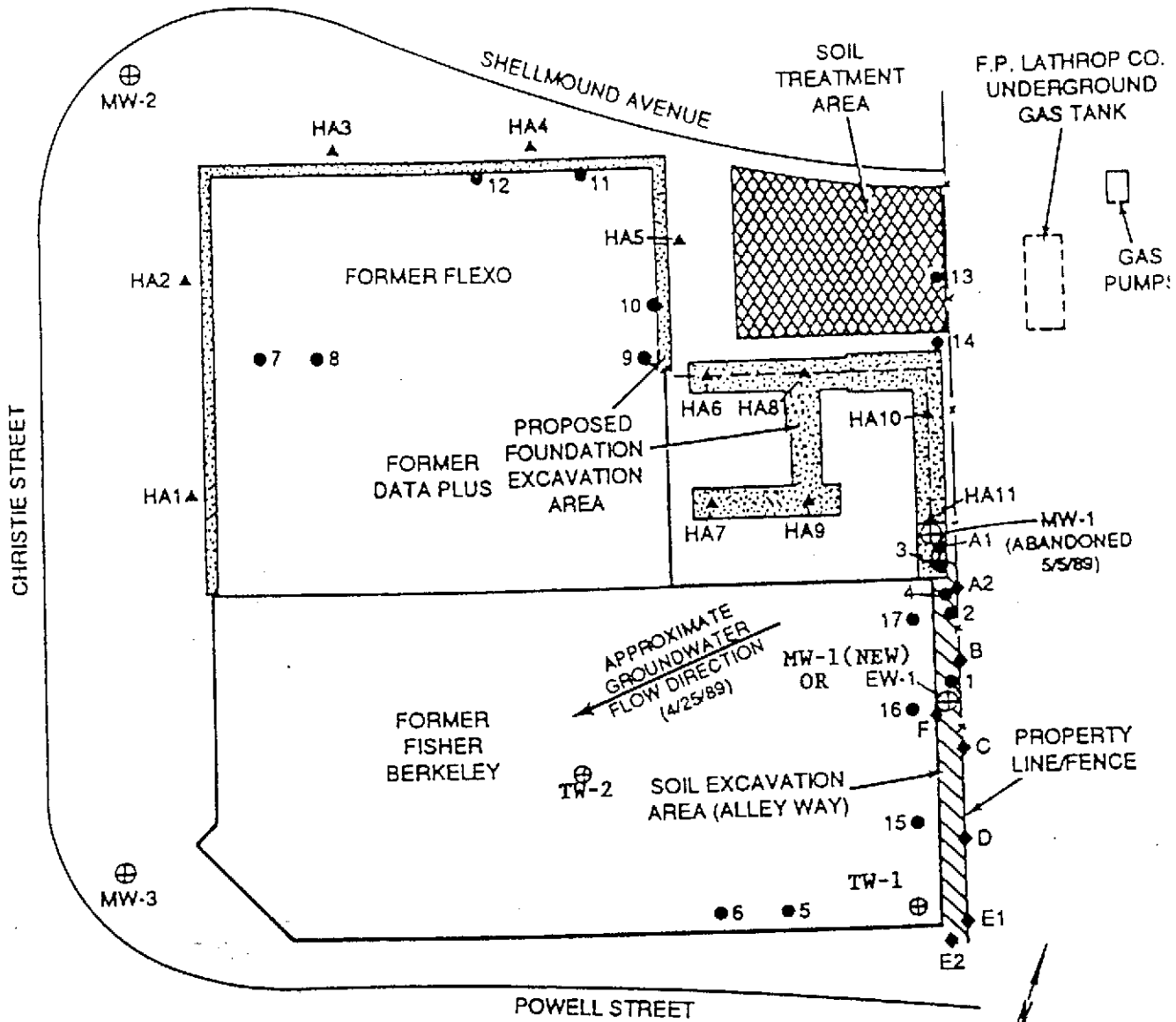
SD-30.2 * 8/86



4" DIA. GROUNDWATER EXTRACTION WELL
 TOTAL DEPTH 20 FEET
 WELL EW-1

SCHEMATIC DIAGRAM OF
 GROUNDWATER EXTRACTION/TREATMENT
 FLOW PROCESS AND DISCHARGE
 5800 CHRISTIE ST., EMERYVILLE, CALIF.

FIGURE 1
LOCATION MAP



LEGEND

- GIL'S SOIL BORING LOCATION
- ▲ FOUNDATION EXCAVATION SOIL SAMPLE LOCATION
- ◆ EXCAVATION SOIL SAMPLE
- ⊕ WELL

SCALE IN FEET
(APPROX)



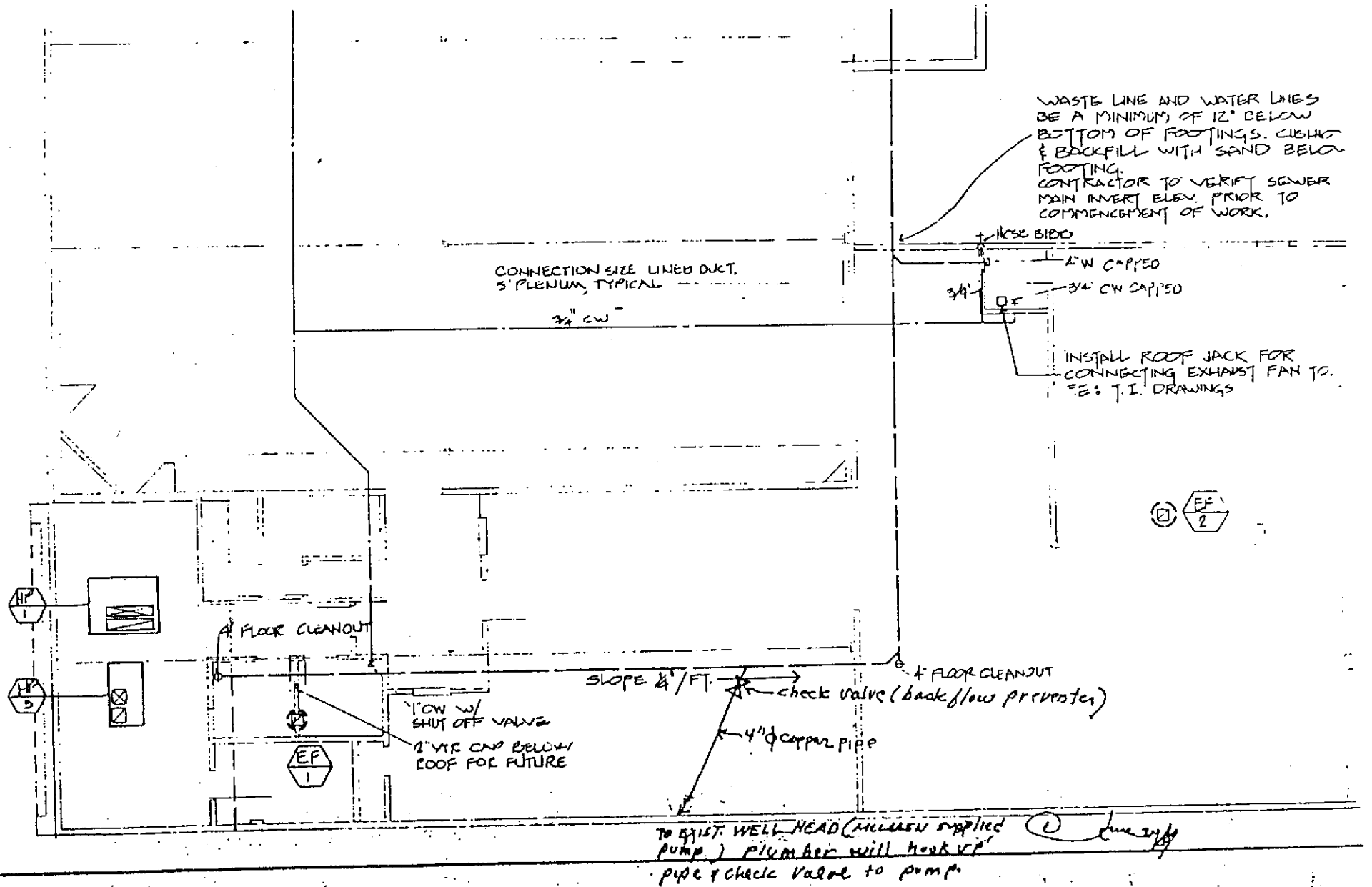


FIGURE 2



SCIENTIFIC ENVIRONMENTAL
LABORATORIES, INC.

McLaren Environmental Engineering
980 Atlantic Avenue Suite 100
Alameda, Ca. 94501

Attn: Mr. Walter Loo

June 26, 1989
Lab. #T891472
Rush

RECEIVED
JUN 28 1989

McLAREN


certified analytical report

Sample Received: 6-22-89

Date Collection: 6-21-89

Source: MW-1

<u>Analysis</u>	<u>Results (mg/L)</u>	<u>EPA #</u>	<u>D.L.</u>
Chemical Oxygen Demand	420	410.1	1.0
Total Suspended Solids	12	160.2	1.0
Lead	< 0.05	7420	0.05
Total Dissolved Solids	16000	160.1	1.0



Shui Fong
Director, Water Laboratory

SF:dc