

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



F

August 30, 2007

Mr. Dave Goldberg
Rolls-Royce Engine Services-Oakland Inc.
7200 Earhart Road
Oakland, CA 94621

Mr. Dale Klettke
Port of Oakland
530 Water St.
Oakland, CA 94607

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

Dear Messrs. Goldberg and Klettke:

Subject: Toxics Leak Case RO0002606 and Geotracker ID T06019775776, National Airmotive Corporation, 6701 Earhart Rd., Oakland, CA 94621

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including the July 25, 2007 Work Plan Addendum for Soil Remediation and Installation of Additional Groundwater Monitoring Wells prepared by Gettler-Ryan Inc. The work plan was prepared after an on-site meeting with Rolls Royce, Gettler-Ryan and the County. It was agreed that it would be difficult to remove all of the engine testing equipment to perform the originally proposed excavation, therefore, an area southwest of the test cell will be excavated. The installation of a drainage system southwest of test cell #2 within the excavation and the installation of fourteen (14) monitoring wells will be performed as previously proposed. Our office approves this work plan. We request that you address the following technical comments, some previously stated in the County's March 5, 2007 letter, when performing this work.

TECHNICAL COMMENTS

1. Monitoring Well Locations- We request that an additional monitoring well be installed between proposed wells MW-11 and MW-12, just west of Trench 2, to determine groundwater conditions near known discharges to soil and groundwater.
2. Chemical Analysis- We request that the soil and groundwater samples collected near the proposed excavation also include the analysis of naphthalene by EPA Method 8260 given the previous results.
3. Other Agency Notification- Your plan for the construction of a drainage system and discharge of groundwater will require permits from the Port of Oakland, the City of Oakland CUPA and the Water Board. Please confirm permit approvals with these agencies prior to construction, installation and operation of this system.
4. Monitoring Well Sampling- Please include the NPORD wells along with the existing and new wells as part of your groundwater monitoring program. As appropriate, you may make recommendations to change from the initial quarterly monitoring schedule and groundwater extraction from specific wells.
5. Removal of Groundwater from Excavation Pit- Although it is believed to be difficult, as possible, groundwater entering the excavation pit should be observed for sheen or dissolved petroleum content. If impacted groundwater is encountered, it should be removed and disposed to the extent possible. Samples of the extracted

groundwater should be tested and an estimate made of the mass of petroleum removed.

TECHNICAL REPORT REQUEST

Please submit the following technical reports to our office according to the following schedule:

- 60 days after completion of soil and groundwater remediation- Soil and Water Investigation Report
- 60 days after Monitoring Well Installation- Well Construction Report and Quarterly Monitoring Report

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic%20reporting)).

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

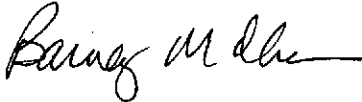
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For 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 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.

If you have any questions, please call Donna Drogos at (510) 567-6721 or me at (510) 567-6765.

Sincerely,



Barney M. Chan
Sr. Hazardous Materials Specialist

cc: files, D. Drogos
Mr. David Elias, SFRWQCB
Ms. Alyce Sandbach, Alameda County District Attorney Office
Mr. Greg Gurss, Gettler-Ryan, 6747 Sierra Court, Suite J, Dublin, CA 94568

8_30_07 6701 EarhartRd

6/12/07 Notes to file, RO0002606, National Airmotive, 6701 Earhart Rd., Oakland

I met with Greg Gurs of Gettler Ryan and Dave Goldberg of Rolls Royce today at their test facility. GR had won the bid to perform the proposed work ie soil excavation, MW installation and trench collection and drainage system. Test cell 2, where the proposed excavation is, has a hoist, suspension system used to mount the test engines. The footings are securely mounted to the ground and RR would like not to excavate in this area. They understand that long term monitoring would be required since unknown source area would still remain. In addition, the offsite drain system is not practical since EBMUD does not run to this facility and a NPDES permit is presumed difficult to obtain. They propose to install an oil water separator and remove water into a holding tank for disposal. I approved this approach and GR will submit a revised work plan. Additionally, RR has had difficulty in obtaining access to Port property to either sample the wells or install wells. They will continue to work on this.

Barney Chan



Rolls-Royce

Philip G. Marquis, CPE
 Director, Facilities, Safety & Environmental Programs

Rolls-Royce Engine Services- Oakland Inc.
 7200 Earhart Road
 Oakland, CA 94621-4504
 Tel: (510) 613-1017 Fax: (510) 635-2209
 E-mail: pmarquis@rolls-royceeso.com



Rolls-Royce

Dave Goldberg
 Environmental Manager

Rolls-Royce Engine Services- Oakland Inc.
 7200 Earhart Road
 Oakland, CA 94621-4504
 Tel: (510) 615-5095 Fax: (510) 635-2209
 E-mail: dgoldberg@rolls-royceeso.com

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



F

March 5, 2007

Mr. Dave Goldberg
Rolls-Royce Engine Services-Oakland Inc.
7200 Earhart Road
Oakland, CA 94621

Mr. Dale Klettke
Port of Oakland
530 Water St.
Oakland, CA 94607

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

Dear Messrs. Goldberg and Klettke:

Subject: Toxics Leak Case RO0002606 and Geotracker ID T06019775776, National Airmotive Corporation, 6701 Earhart Rd., Oakland, CA 94621

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including the October 17, 2006 Soil Remediation and Installation of Additional Groundwater Monitoring Wells prepared by Applied Remediation Company, Inc. (ARCI). The work plan proposes the excavation and disposal of targeted impacted area near the trenches near the 10,000 gallon UST, the extraction of contaminated groundwater, the installation of a drainage system southwest of test cell #2 and the installation of fourteen (14) monitoring wells. Our office approves this work plan. We request that you address the following technical comments when performing this work.

TECHNICAL COMMENTS

1. Monitoring Well Locations- We request that an additional monitoring well be installed between proposed wells MW-11 and MW-12, just west of Trench 2, to determine groundwater conditions near known discharges to soil and groundwater.
2. Chemical Analysis- We request that the soil and groundwater samples collected near the proposed excavation also include the analysis of naphthalene by EPA Method 8260 given the previous results.
3. Other Agency Notification- Your plan for the construction of a drainage system and discharge of groundwater will require permits from the Port of Oakland, City of Oakland CUPA and the Water Board. Please confirm permit approvals with these agencies prior to construction, installation and operation of this system.
4. Monitoring Well Sampling- Please include the NPORD wells along with the existing and new wells as part of your groundwater monitoring program. As appropriate, you may make recommendations to change from the initial quarterly monitoring schedule and groundwater extraction from specific wells.

TECHNICAL REPORT REQUEST

Please submit the following technical reports to our office according to the following schedule:

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Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic%20reporting)).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

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

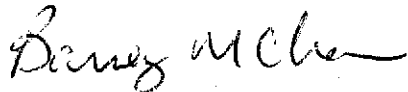
recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this case meet this requirement.

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.

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos

Mr. David Elias, SFRWQCB

Ms. Alyce Sandbach, Alameda County District Attorney Office

Mr. Briggs Ogamba, ARCI, 1376 N. 4th St., Ste. 203, P.O. Box 612421,
San Jose, CA 95161-2421



102606

PORT OF OAKLAND

October 18, 2005

Mr. Barney Chan
Alameda County Health Care Services Agency
Environmental Protection Division
1131 Harbor Bay Parkway, #250
Alameda, CA 94502-6577

Alameda County
OCT 24 2005
Environmental Health

**SUBJECT: ROLLS ROYCE TEST CELL FACILITY
U.S. ARMY CORPS OF ENGINEERS – NORTH FIELD FACILITY**

Dear Mr. Chan:

Enclosed are copies of the following letters/reports per our meeting on October 13, 2005:

Rolls Royce Test Cell Facility

Port of Oakland Memo dated October 1, 1998 (with photographs)

National Airmotive Corporation letter to Alameda County Department of Environmental Health dated 10/14/98

FOSS Environmental & Infrastructure "Report on Underground Storage Tank Upgrade and Piping Removal/Closure Activities, National Airmotive Corporation Engine Test Facility, Oakland, California", dated November 13, 1998

Kleinfelder, Inc. "Report of Supplemental Site Investigation, Rolls-Royce Engine Services Test Cell Facility, 6701 Earhart Road, Oakland, California", dated August 23, 2002.

U.S. Army Corps of Engineers

LFR Levine•Fricke "Site Inspection Work Plan, Former Naval Auxiliary Air Station, Oakland, Oakland, California", dated May 17, 2005.

Should you have any questions or need additional information, please contact me at 627-1118. Thank you for your on-going assistance and support on these projects.

Sincerely,

Dale Klettke, CHMM
Associate Environmental Scientist
Port Environment & Safety Department

enclosures

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

May 31, 2005

Mr. Phillip Marquis
Rolls Royce Engine Service-Oakland Inc.
7200 Earhart Rd.
Oakland, CA 94621

Dear Mr. Marquis:

Subject: TOXICS Case RO000 [REDACTED] [REDACTED] National Airmotive Corporation, 6701 Earhart Rd.,
Oakland, CA 946 [REDACTED]

Our records indicate that the current balance on the above-referenced TOXICS oversight account is -\$445.00. 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 \$3000.00. Please send your check to the attention of our Finance Department.

This initial 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, 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 \$160.00 per hour.

Please write "TOXICS" (the type of project), the site address and the AR# 0311333 on your check.

If you have any questions, please contact me at (510) 567-6862.

Sincerely,

Ariu Levi
Division Chief

cc: D. Drogos, J. Jacobs, files
Mr. D. Klettke, Port of Oakland, P.O. Box 2064, Oakland, CA 94604-2064

Chan, Barney, Env. Health

To: dklettke@portoakland.com
Cc: Levi, Ariu, Env. Health; Drogos, Donna, Env. Health
Subject: Port of Oakland Priority sites

Mr. Klettke:

This message is to inform you that we have received your May 19, 2005 letter requesting oversight for the Port's priority site. We would like to assure you that we will following up on these sites and would like to inform you of their current status:

1. UAL, 1100 Airport Drive, RO414. As you are aware, three former UST locations existed at the same address, though each is distinctly located from each other. Your proposal to close the UST portion of the site, although practical, is not possible. First the common address does not allow for a distinction of the three UST locations, so to close the USTs, all releases from the USTs must be closeable. This is a problem for former USTs MF25/26, since the HVOCs appear commingled with the TPH releases from the USTs. The source(s) of the HVOCs is not known and could even be from solvent releases from the USTs. So, I suggest that instead of closing the UST portion of the investigation, we should transfer the entire site to a SLIC site and eventual site closure would include the releases from the USTs plus the apparent widespread HVOC release. I will be sending a request for a deposit to set up this account.
2. USTs MF8/9/10, 0 Taxiway, RO87. I understand that the Port intends to perform additional "hot spot" removal, confirmation soil and grab groundwater sampling as early as this week. This work was proposed to remediate elevated residual concentrations in the former tank pits. Upon performing this work and obtaining confirming data, you may submit a request for site closure.
3. Tracon Facility, 7200 Grumman St., RO0002593. The County has sent out a letter dated 5/16/05 requesting technical information upon review of the submitted tank removal report. Please let us know if you have not received the letter.
4. Rolls Royce Test Cell Facility(formerly National Airmotive), 6701 Earhart Rd., RO0002606. Apparently there has been confusion in the status of the site as Rolls Royce has requested closure in the past. Because I will need to review the file to determine the status, and because the site is currently arrears in its balance, I will need to send out a request and receive additional funds before resuming work on this site.
5. Praxair/Liquid Carbonic, 901 Embarcadero, RO0002462. The County has received the Summary Subsurface Investigation Report, 4/2004 and will proceed with our review in determining site/closure status.

Please call me if you have any questions.

Barney Chan
Hazardous Materials Specialist
510-567-6765

Barney M. Chan
Hazardous Materials Specialist
Alameda County Environmental Health
510-567-6765

5/31/2005

Facsimile**Rolls-Royce**

To Ariu Levi
Company Alameda County DEH
Fax number (510) 337-9335
Date 8-27-04
Pages 4

From Phil Marquis
Location Rolls-Royce Engine Services-Oakland Inc.
Direct dial (510) 613-1017
Direct fax (510) 635-2209

Dear Mr. Levi:

Attached is the documentation we discussed over the telephone. All of the actions required by National Airmotive Corporation were completed.

In a letter to Roger Bastien dated 2/21/96 (copy attached) the final agreement was presented. Subsequently, National Airmotive complied with all of the conditions of that letter.

As you will read, Scott Seery requested an additional \$1100.00 to fund the project to closure. These funds were submitted to ACDEH on 3/7/96 as evidenced by the receipt from your auditor-controller.

As far as we are aware, there are no remaining actions on our part, and we have been awaiting a closure letter from Scott Seery. Despite several calls, in which Scott assured me he would attend to this, we never received the closure letter nor any other information.

If I can provide any further information, please let me know. I've got all of the documentation pertaining to this issue.

Phil Marquis
Director, Facilities, Environmental, Health & Safety Programs

Cc: Greg Dunn
Rolls Royce Corporation

Jay Gross
Rolls-Royce Engine Services

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 19, 2004

Mr. Phillip Marquis
Rolls Royce Engine Service-Oakland Inc.
7200 Earhart Rd.
Oakland, CA 94621

Dear Mr. Marquis:

Subject: TOXICS Case RO0002606, Former National Airmotive Corporation, 6701 Earhart Rd.,
Oakland, CA 94621

Our records indicate that the current balance on the above-referenced TOXICS oversight account is -\$349.00. 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 \$2800.00. Please send your check to the attention of our Finance Department.

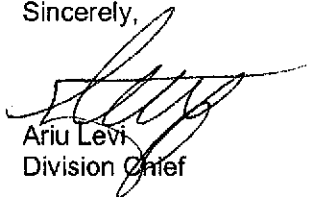
This initial deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, additional deposit will be requested. Otherwise, any unused monies will be refunded to you 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 \$160.00 per hour.

Please write "TOXICS" (the type of project), the site address and the AR# 0311333 on your check.

If you have any questions, please contact me at (510) 567-6862.

Sincerely,



Ariu Levi
Division Chief

cc: D. Drogos, B. Chan



Rolls-Royce

Rolls-Royce Engine Services-Oakland Inc.

7200 Earhart Road
Oakland, California 94621-4504

Tel: (510) 613-1000

October 2, 2000

Mr. Dale Boyer
Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA. 94612

Subject: Preliminary Investigation Report, Chemical Storage Area, Rolls-Royce Engine Services, 7200 Earhart Road, Oakland, CA.

Dear Mr. Boyer:

This letter is confirming a telephone conversation on September 6, 2000 between you and I. At that time, I was informed that the Regional Water Quality Control Board had been in contact with Scott Seery of the Alameda County Department of Environmental Health regarding any action that might have been required as a result of the referenced investigation report submitted to RWQCB. You also informed me that the joint decision between your office and the Alameda County Department of Environmental Health was to require no further action, and that a letter documenting no further action required would be sent from Scott Seery since Alameda County Department of Environmental Health was the lead agency in this matter.

At this time, we have not yet received the final letter of disposition stating that no further action would be required. We anticipate start of construction around November, 2000. Before we initiate any construction activities supporting this project, we would prefer to have that letter in our files.

Since we need to proceed with the construction phase of this project, we are sending this letter, as a confirmation of our understanding that no further action will be required as a result of building over the site occupied by the chemical storage area.

Please contact me if you have any questions.

Sincerely,

Philip G. Marquis
Sr. Mgr., Facilities and Environmental Programs

CC: Mr. Scott Seery
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA. 94502

Greg Dunn – Rolls-Royce Corporation
Jay Gross – Rolls-Royce Engine Services – Oakland Inc



Rolls-Royce

ENVIRONMENTAL
PROTECTION

00 APR 19 PM 2:52

Rolls-Royce Engine Services-Oakland Inc.

7200 Earhart Road
Oakland, California 94621-4504

Tel: (510) 613-1000

Dear Supplier:

We are in the process of updating our supplier accounts and we need your TIN information. Please fill out the enclosed W-9 and return it via fax at (510) 562-7426. Your swift response to this matter is greatly appreciated.

Thank you.

Yasmin Mukhtar

Accounts Payable Lead

A handwritten signature in cursive script that reads 'Yasmin Mukhtar'.

Phone: (510) 613-1033

TO BARBARA CHAN @ ALAMEDA COUNTY
ENVIRONMENTAL HEALTH
1131 HARBOR BAY PKWY ALAMEDA CA 94502-6577
OAKLAND FIRE SERVICES AGENCY

Transfer of Eligible Local Oversight Case

STID _____ Date of input/By: _____

Date: 4-27-99 From: STEPHEN CRAWFORD

Site Name: NAC @ 7200 EARHART RD

Address: 7200 EARHART City: OAKLAND Zip: 94621

To be eligible for LOP, case must meet 3 qualifications:

1. N Tanks Removed? # removed? 1 Date removed: 3-5-99
2. N Samples received? Contamination level: 590 ppm mg/kg +
Type of test H₂O 1500mg/kg MTBE

Contamination should be over 100 ppm TPH to qualify for LOP

3. N Petroleum? Circle Type (s):

Avgas leaded fuel oil jet GASOLINE
diesel waste oil kerosene solvents

Request for Taxpayer Identification Number and Certification

Give form to the requester. Do NOT send to the IRS.

Name (If a joint account or you changed your name, see **Specific Instructions** on page 2.)

Business name, if different from above. (See **Specific Instructions** on page 2.)

Please print or type

Check appropriate box:	<input type="checkbox"/> Individual/Sole proprietor	<input type="checkbox"/> Corporation	<input type="checkbox"/> Partnership	<input type="checkbox"/> Other ▶
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Address (number, street, and apt. or suite no.)

City, state, and ZIP code

Requester's name and address (optional)

List account number(s) here (optional)

Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. For individuals, this is your social security number (SSN). However, if you are a resident alien OR a sole proprietor, see the instructions on page 2. For other entities, it is your employer identification number (EIN). If you do not have a number, see **How To Get a TIN** on page 2.

Social security number

OR

Employer identification number

Note: If the account is in more than one name, see the chart on page 2 for guidelines on whose number to enter.

Part II For Payees Exempt From Backup Withholding (See the instructions on page 2.)

Part III Certification

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding.

Certification Instructions. - You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the Certification, but you must provide your correct TIN. (See the instructions on page 2.)

Sign Here	Signature ▶	Date ▶
------------------	-------------	--------

Purpose of Form. -- A person who is required to file an information return with the IRS must get your correct taxpayer identification number (TIN) to report, for example, income paid to you, real estate transactions, mortgage interest you paid, acquisition or abandonment of secured property, cancellation of debt, or contributions you made to an IRA.

Use Form W-9 to give your correct TIN to the person requesting it (the requester) and, when applicable, to:

1. Certify the TIN you are giving is correct (or you are waiting for a number to be issued),
2. Certify you are not subject to backup withholding, or
3. Claim exemption from backup withholding if you are an exempt payee.

Note: If a requester gives you a form other than a W-9 to request your TIN, you must use the requester's form if it is substantially similar to this Form W-9.

What Is Backup Withholding? -- Persons making certain payments to you must withhold and pay to the IRS 31% of such payments under certain conditions. This is called "backup withholding." Payments that may be subject to backup withholding

include interest, dividends, broker and barter exchange transactions, rents, royalties, nonemployee pay, and certain payments from fishing boat operators. Real estate transactions are not subject to backup withholding.

If you give the requester your correct TIN, make the proper certifications, and report all your taxable interest and dividends on your tax return, payments you receive will not be subject to backup withholding. Payments you receive will be subject to backup withholding if:

1. You do not furnish your TIN to the requester, or
2. The IRS tells the requester that you furnished an incorrect TIN, or
3. The IRS tells you that you are subject to backup withholding because you did not report all your interest and dividends on your tax return (for reportable interest and dividends only), or
4. You do not certify to the requester that you are not subject to backup withholding under 3 above (for reportable interest and dividend accounts opened after 1983 only), or

5. You do not certify your TIN when required. See the Part III instructions on page 2 for details.

Certain payees and payments are exempt from backup withholding. See the Part II instructions and the separate **Instructions for the Requester of Form W-9.**

Penalties

Failure To Furnish TIN. -- If you fail to furnish your correct TIN to a requester, you are subject to a penalty of \$50 for each such failure unless your failure is due to reasonable cause and not to willful neglect.

Civil Penalty for False Information With Respect to Withholding. -- If you make a false statement with no reasonable basis that results in no backup withholding, you are subject to a \$500 penalty.

Criminal Penalty for Falsifying Information. -- Willfully falsifying certifications or affirmations may subject you to criminal penalties including fines and/or imprisonment.

Misuse of TINs. -- If the requester discloses or uses TINs in violation of Federal law, the requester may be subject to civil and criminal penalties.

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: ⁷⁹⁰⁻⁷²⁸¹ Jackie Bretschneider / ⁵⁶⁹⁻⁰⁵⁰⁵ Bob Chambers

FROM: Scott Seery

DATE: 4-26-99

Total number of pages including cover sheet 3

-NOTES- NAC dispersement concurrence
Balance to remain in subaccount pending
final case evaluation

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
411	510 7907281	04-26 13:42	00' 55	03/03	OK		

7499402045

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: ⁷⁹⁰⁻⁷²⁸¹ Jackie Bretschneider / ⁵⁶⁹⁻⁰⁵⁰⁵ Bob Chambers

FROM: Scott Seery

DATE: 4-26-99

Total number of pages including cover sheet 3

-NOTES- NAC dispersement concurrence
Balance to remain in subaccount pending
final case evaluation

COM No.	REMOTE STATION	START TIME	DURATION	PAGES	RESULT	USER ID	REMARKS
412	DIS ATT OFF	04-26 13:43	01'00	03/03	OK		

7499402045

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: Jackie Bretschneider / Bob Chambers 790-7281 569-0505

FROM: Scott Seery

DATE: 4-26-99

Total number of pages including cover sheet 3

-NOTES- NAC dispersement concurrence
Balance to remain in subaccount pending
final case evaluation

TRANSMITTAL

ENVIRONMENTAL
PROTECTION

00 APR 29 PM 1:32

TO:

DATE: April 23, 1999
NAME: Woody Ano
COMPANY NAME: National Airomotive
ADDRESS: 7200 Eardt Road
Oakland, CA 94612

SCS ENGINEERS

Environmental Consultants

6850 Regional Street
Suite 240
Dublin, California 94568

Phone 925 829-0661
FAX 925 829-5493

FROM: Lenard Long
JOB/OVERHEAD NUMBER: 0198205.00

COMMENTS:

Attached are three copies of the Tank Closure Report for National Airomotive 7200 Earhardt Road, Oakland, CA.

If you have any questions, please do not hesitate to contact me. Thank you.

CC: Jerry Crawford, City of Oakland Fire Department

ENVIRONMENTAL
PROTECTION

99 FEB 26 PM 4: 37

February 23, 1999

VIA FACSIMILE AND MAIL

Robert Chambers, Esq.
Office of the District Attorney
7677 Oakport Street, Suite 400
Oakland, Calif. 94621

Scott O. Seery, CHMM
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, Calif. 94502-6577

RE: People v. National Airmotive Corporation
Alameda County Superior Court, Case No. H-179506-2

Alameda County Hazardous Materials Training and Resource Trust
Account - NAC Oakland Airport Remediation Sub-Account

Gentlemen:

Thank you both for your telephone messages of this date. This letter is simply to confirm that, following your review of National Airmotive Corporation's (NAC's) submission of January 21, 1999, you have determined that payment to NAC is warranted in the amount of \$14,734.00 from the above-referenced account, pursuant to the Consent Judgment in the above-referenced case and the letter agreement between the parties, dated June 10, 1996. Both the Company and I very much appreciate your prompt consideration of this matter.

In response to Mr. Seery's inquiry, the check should, indeed, be made payable to "National Airmotive Corporation." It should be sent directly to Mr. Woody Ano at NAC, and I would appreciate it greatly if a copy of the letter of transmittal were sent to me at the same time.

In response to Mr. Chambers' inquiry, it is NAC's understanding that the balance of the funds in the Sub-Account, following payment of the \$14,734.00 to NAC, may now be disbursed as appropriate and the Sub-Account closed. for the record, NAC has no objection to disbursement of the remaining funds to whatever accounts or funds you deem appropriate (provided, of course, that NAC has no liability with respect to any claim that those funds were not properly directed).

1891 Landings Drive
Mountain View, California 94043
Telephone: (650) 428-3900
Facsimile: (650) 428-3901
Web Site: www.gcounsel.com

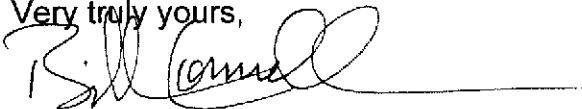
*04-26-99
CONCUR -
disperse the
indicated sum
(\$14,734) to
NAC. Balance
is to remain in
account pending
final case
evaluation.
MS*

Robert Chambers, Esq.
Scott O. Seery, CHMM
February 23, 1999
Page 2

Finally, I do not believe that any further filing in the Superior Court is required to close this matter. If you have any question in this regard, please don't hesitate to call.

Once again, thank you both for your courtesy and cooperation in bringing this matter to a resolution.

Very truly yours,

A handwritten signature in black ink, appearing to read "Bill Connell", with a long horizontal line extending to the right.

WILLIAM D. CONNELL

cc: National Airmotive Corporation



General Counsel Associates LLP
1891 Landings Drive
Mountain View, California 94043

Billing No. 5037

FAX

Telephone: (650) 428-3900 Facsimile: (650) 428-3901

TO: Scott O. Seery, CHMM
Environmental Health Services

FAX NO.: 510-337-9335

FROM: William D. Connell

PAGES: 2 + Cover

DATE: February 23, 1999 5:45pm

MESSAGE:

Please deliver to Mr. Seery as soon as possible. Thank you.

THIS FAX IS INTENDED FOR THE ADDRESSEE ONLY AND MAY BE CONFIDENTIAL OR PRIVILEGED. IF YOU ARE NOT THE INTENDED RECIPIENT, PLEASE BE ADVISED THAT ANY USE OR DISSEMINATION OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND WE WILL ARRANGE FOR THE RETRIEVAL OF THE DOCUMENT AT NO COST TO YOU.



General Counsel Associates LLP
1891 Landings Drive
Mountain View, California 94043

Billing No. 5037

FAX

Telephone: (650) 428-3900 Facsimile: (650) 428-3901

TO: Scott O. Seery, CHMM
Environmental Health Services

FAX NO.: 510-337-9335

FROM: William D. Connell

PAGES: 1 + Cover

DATE: February 19, 1999 9:23am

MESSAGE:

Please deliver to Mr. Seery as soon as possible. Thank you.

THIS FAX IS INTENDED FOR THE ADDRESSEE ONLY AND MAY BE CONFIDENTIAL OR PRIVILEGED. IF YOU ARE NOT THE INTENDED RECIPIENT, PLEASE BE ADVISED THAT ANY USE OR DISSEMINATION OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND WE WILL ARRANGE FOR THE RETRIEVAL OF THE DOCUMENT AT NO COST TO YOU.

ENVIRONMENTAL
PROTECTION

99 FEB 22 PM 5:26

February 18, 1999

VIA FACSIMILE AND MAIL

Robert Chambers, Esq.
Office of the District Attorney
7677 Oakport Street, Suite 400
Oakland, Calif. 94621

Scott O. Seery, CHMM
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, Calif. 94502-6577

RE: People v. National Airmotive Corporation
Alameda County Superior Court, Case No. H-179506-2

**Alameda County Hazardous Materials Training and Resource Trust
Account – NAC Oakland Airport Remediation Sub-Account**

Gentlemen:

On January 21, 1999, I sent to each of you a letter, with enclosures, setting forth NAC's revised request for reimbursement from the remaining balance of the NAC Oakland Airport Remediation Sub-Account. I realize that the letter contained substantial additional material beyond what had been presented in my earlier letter of October, 1998, and what was discussed in our meeting in November, 1998. Accordingly, I also understand that you required a reasonable time in which to review and consider all of the information presented.

It has now been almost a month since the letter was forwarded to you. Naturally, National Airmotive Corporation and I are quite interested in hearing from you regarding when, and in what manner, the outstanding issues will be resolved. To that end, I would very much appreciate hearing from you, at your earliest opportunity, regarding at least the status (if not the substance) of your review of, and response to, NAC's reimbursement request.

Thank you for your courtesy in this regard. I look forward to hearing from you.

Very truly yours,



WILLIAM D. CONNELL

1891 Landings Drive
Mountain View, California 94043
Telephone: (650) 428-3900
Facsimile: (650) 428-3901
Web Site: www.gcounsel.com

Robert Chambers, Esq.
Scott O. Seery, CHMM
February 18, 1999
Page 2

cc: National Airmotive Corporation

121085

ALACOU

12/14/98

INVOICE DATE	YOUR INVOICE NUMBER	P.O. #	DOC. TYPE	AMOUNT PAID	DISCOUNT TAKEN	NET CHECK AMOUNT
12/3/98			REQUEST	2400.00		2400.00
				2400.00		2400.00

COUNTY OF ALAMEDA
 TREASURER-TAX COLLECTOR'S OFFICE
 INTERDEPARTMENTAL COMMUNICATION
 NOTICE OF CHECK RETURNED BY BANK

RC NO. 1111

DATE : 12-30-98
 TO : ENVIRONMENTAL HEALTH
 ATTN : JIM TROLAN

RETURNED HERewith 1 CHECK(S)

DEPOSIT PERMIT NO.	DATE	AMOUNT OF CHECK	SIGNED/ISSUED BY
16002	12-21-98	\$ 2,400.00 NAC	

ENVIRONMENTAL HEALTH
 ADMINISTRATION
 98 DEC 31 AM 9:13

FUND CHARGED:

DEPOSIT PERMIT NO.	FUND NAME	ACCOUNT NO.	AMOUNT
16002	PRE DEP UNDERG TNKS (.16) #90	990-9444	\$ 2,400.00



ALACOU -16002

12/9/98

OAKLAND INT'L AIRPORT / 7200 EARHART ROAD
 P.O. BOX 8069 / OAKLAND, CALIFORNIA 94603-0069
 TEL: (510) 613-1000

NationsBank of Georgia, N.A.
 Atlanta, DeKalb County, Georgia

64-1278
 611

120786

9444.16

PAY TWO THOUSAND FOUR HUNDRED DOLLARS AND NO CENTS

TO THE ORDER OF ALAMEDA COUNTY HEALTH CARE SERVICES
 1131 HARBOR PARKWAY, SUITE 250
 ALAMEDA, CA 94502-6577

PAYMENT STOPPED BY ORDER OF DRAWER
 \$2,400.00
 480013529 5777 5777 52 12 21 98

Jim Trolan

470401946 2730 2730 04 12-22-98

AUTHORIZED SIGNATURE

⑈ 120786 ⑈ ⑆061112788⑆ 010 7 9308 ⑈ ⑈0000240000⑈

⑆9999⑆4444⑆ 28401310 ⑈ ⑈0000240000⑈



ALACOU

12/9/98

OAKLAND INT'L AIRPORT / 7200 EARHART ROAD
P.O. BOX 6069 / OAKLAND, CALIFORNIA 94603-0069
TEL: (510) 613-1000

NationsBank of Georgia, N.A.
Atlanta, DeKalb County, Georgia

64-1278
611

1-20786

9444.16

PAY TWO THOUSAND FOUR HUNDRED DOLLARS AND NO CENTS

TO THE ORDER OF ALAMEDA COUNTY HEALTH CARE SERVICES
1131 HARBOR PARKWAY, SUITE 250
ALAMEDA, CA 94502-6577

678

\$2,400.00

[Handwritten Signature]

[Handwritten Signature]

AUTHORIZED SIGNATURE

⑈ 120786 ⑈ ⑆ 0611127881 ⑆ 010 117 9308 ⑈

REF./ACCT. # M /
Add on

Proj # 2833A payor # 853

COUNTY OF ALAMEDA
OFFICE OF THE AUDITOR-CONTROLLER

MISCELLANEOUS RECEIPT No 787620

\$ 2,400.00 / 16
60/100 DOLLARS

Two Thousand Four Hundred

CASH PERSONAL/CASHIER'S CHECK/M. O. # 120786 OTHER:

RECEIVED FROM Oakland INTL Airport 7200 Earhart Rd. Oakland CA 94603-0069

FOR: NAC Test Facility Earhart Rd. Oakland Airport

DATE: 12/11/98 RECEIVED BY: J. Bette DEPT. NO.: 430-4530

December 29, 1998

Scott O. Seery, CHMM
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, Calif. 94502-6577

98 DEC 30 PM 3:39
CALIFORNIA
PROTECTION

RE: STID # 1047
Project # 2833A
Project Type Mitigation

Dear Scott:

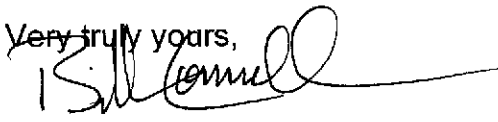
Now look hard st oak 94621

Per our recent voicemail communications and your letter of November 30, 1998, to Woody Ano at National Airmotive Corporation, enclosed herewith please find a National Airmotive Corporation Check No. 121085 (dated 12/14/98) in the amount of \$2,400 to cover the amount owing and estimated for oversight costs involving the above-referenced project.

As indicated in my voicemail message of this same date, there is a substantial likelihood that, due to a mix-up in the NAC accounting department, a "stop payment" order was issued with respect to the check earlier forwarded to your office in payment of this amount. If, in fact, the earlier check was honored and deposited before the "stop payment" could take effect, I would greatly appreciate it if you would return the enclosed check to me. On the other hand, if the earlier check was not honored, the enclosed check may be deposited at your earliest convenience. I very much apologize for any inconvenience caused by this mix-up.

Finally, as mentioned in my messages, NAC will be forwarding the information relating to its proposed claim for the remaining trust fund amounts very shortly. I look forward to speaking with you and Bob Chambers shortly to bring this matter to a close.

Thank you again for your courtesy and cooperation in this matter. Best Wishes for the New Year.

Very truly yours,


WILLIAM D. CONNELL

1891 Landings Drive
Mountain View, California 94043
Telephone: (650) 428-3900
Facsimile: (650) 428-3901
Web Site: www.gcounsel.com

Scott O. Seery, CHMM
December 29, 1998
Page 2

Enclosure

cc: Robert Chambers, Esq. [without enclosure]
National Airmotive Corporation [without enclosure]

General Counsel Associates LLP

1891 Landings Drive • Mountain View, California 94043

Scott O. Seery, CHMM
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda,
Calif. 94502-6577

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



November 30, 1998

STID 1047

Mr. Woody Ano
National Airmotive Corporation
7200 Earhart Road
Oakland, CA 94621-4504

ENVIRONMENTAL HEALTH SERVICES

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

RE: NAC Test Facility, Earhart Road, Oakland Airport – Request for Supplemental Deposit to Cover Current and Expected Future Environmental Project Oversight Charges

Dear Mr. Ano:

As we discussed during our meeting on November 24th, the initial and supplemental deposits for oversight of the subject project have been exhausted. As of 11/24/98, there was a deficit of \$1746.20 in this account for the case management and administrative charges incurred to date. This agency currently bills at the rate of \$100 per hour; prior to July 1, 1998 our rate was \$94 per hour; prior to July 1996, it was \$90 per hour. An accounting of case management time is attached for your records.

Please remit a check for the sum of \$2400 to cover the current deficit and to fund approximately 6.5 additional hours of future oversight. With your remittance please be certain to include a cover letter to my attention which presents the following information:

STID #	1047
Project #	2833A
Project type	Mitigation

The deposit mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code.

Please contact me at (510) 567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachments

c: Mee Ling Tung, Director, Environmental Health
Bob Chambers, Alameda County District Attorney's Office

Printed: 11/25/98

***** Alameda County Department of Environmental Health *****
BILLING's WORKLOG: Total Deposit/Refund History for All Accounts at Site
~~~~~

\*\* SITE INFORMATION \*\*

Site#: 2833 -- StID: 1047 NATIONAL AIRMOTIVE FACILITY  
Date Open: 01/18/95 7200 LOCKHEED STREET  
Date Closed: OAKLAND CA 94621

\*\* PAYOR INFORMATION \*\*

> Project # --2833A for Payor # 853 OAKLAND INT'L AIRPORT  
P.O. BOX 6069  
OAKLAND CA 94603

\*\* DEPOSIT HISTORY \*\*

| Proj#   | Deposit Date | Receipt# | Amount Received |
|---------|--------------|----------|-----------------|
| --2833A | 01/18/95     | 747733   | \$ 2,500.00     |
| --2833A | 03/07/96     | 783452   | \$ 1,100.00     |
|         |              |          | =====           |
|         |              |          | \$ 3,600.00     |

\*\* WORKLOG HISTORY \*\*

| Proj#   | Work Date | Activity Description         | Insp | Time (hrs) | Amount Charged |
|---------|-----------|------------------------------|------|------------|----------------|
| --2833A | 11/15/94  | Investigation in Office      | SOS  | 0.4        | \$36.00 ✓      |
| --2833A | 11/15/94  | Initail Site Visit           | SOS  | 1.3        | \$117.00 ✓     |
| --2833A | 11/15/94  | Meetings, Consultations      | SOS  | 0.3        | \$27.00 ✓      |
| --2833A | 11/16/94  | District Attorney Time       | SOS  | 1.         | \$90.00 ✓      |
| --2833A | 11/17/94  | Meetings, Consultations      | SOS  | 3.3        | \$297.00 ✓     |
| --2833A | 11/17/94  | Investigation in Office      | SOS  | 1.8        | \$162.00 ✓     |
| --2833A | 12/19/94  | Meetings, Consultations      | SOS  | 0.1        | \$9.00 ✓       |
| --2833A | 01/06/95  | Write Letters                | SOS  | 1.3        | \$117.00 ✓     |
| --2833A | 01/06/95  | District Attorney Time       | SOS  | 0.4        | \$36.00 ✓      |
| --2833A | 01/11/95  | Meetings, Consultations      | SOS  | 0.2        | \$18.00 ✓      |
| --2833a | 01/18/95  | <u>administrative charge</u> | adm  | 1.         | <u>\$90.00</u> |



|         |          |                                    |     |     |            |
|---------|----------|------------------------------------|-----|-----|------------|
| --2833A | 02/08/95 | Review Plans/Reports               | SOS | 4.6 | \$414.00 ✓ |
| --2833A | 02/24/95 | Investigation in Office            | SOS | 2.5 | \$225.00 ✓ |
| --2833A | 02/24/95 | Meetings, Consultations            | SOS | 0.1 | \$9.00 ✓   |
| --2833A | 03/31/95 | Meetings, Consultations            | SOS | 0.4 | \$36.00 ✓  |
| --2833A | 05/12/95 | Meetings, Consultations            | SOS | 0.6 | \$54.00 ✓  |
| --2833A | 05/18/95 | Site Complaint                     | SOS | 0.3 | \$27.00 ✓  |
| --2833A | 06/13/95 | Removal<br>Investigation/Follow-up | SOS | 0.3 | \$27.00 ✓  |
| --2833A | 09/26/95 | District Attorney Time             | SOS | 0.2 | \$18.00 ✓  |
| --2833A | 09/26/95 | Meetings, Consultations            | SOS | 0.2 | \$18.00 ✓  |
| --2833A | 10/06/95 | Investigation in Office            | SOS | 0.8 | \$72.00 ✓  |
| --2833A | 10/18/95 | Investigation in Office            | SOS | 0.5 | \$45.00 ✓  |
| --2833A | 10/19/95 | Meetings, Consultations            | SOS | 0.5 | \$45.00 ✓  |
| --2833A | 11/02/95 | Investigation in Office            | SOS | 1.  | \$90.00 ✓  |
| --2833A | 11/03/95 | Investigation On-Site              | SOS | 1.5 | \$135.00 ✓ |

\*\* WORKLOG HISTORY \*\*

|         |          |                                                              |     |     |            |
|---------|----------|--------------------------------------------------------------|-----|-----|------------|
| --2833A | 01/17/96 | District Attorney Time                                       | SOS | 0.1 | \$9.00 ✓   |
| --2833A | 01/31/96 | Meetings, Consultations                                      | SOS | 0.1 | \$9.00 ✓   |
| --2833A | 02/07/96 | Meetings, Consultations                                      | SOS | 0.4 | \$36.00 ✓  |
| --2833A | 02/14/96 | Investigation in Office                                      | SOS | 1.8 | \$162.00 ✓ |
| --2833A | 02/15/96 | Investigation in Office                                      | SOS | 0.9 | \$81.00 ✓  |
| --2833A | 02/15/96 | Meetings, Consultations                                      | SOS | 1.2 | \$108.00 ✓ |
| --2833A | 02/16/96 | Investigation in Office                                      | SOS | 2.  | \$180.00 ✓ |
| --2833A | 02/16/96 | Investigation On-Site                                        | SOS | 1.5 | \$135.00 ✓ |
| --2833A | 02/16/96 | Write Letters                                                | SOS | 1.5 | \$135.00 ✓ |
| --2833A | 02/16/96 | District Attorney Time                                       | SOS | 0.3 | \$27.00 ✓  |
| --2833A | 02/16/96 | Meetings, Consultations                                      | SOS | 0.3 | \$27.00 ✓  |
| --2833A | 02/20/96 | Investigation in Office                                      | SOS | 0.6 | \$54.00 ✓  |
| --2833A | 02/20/96 | Write Letters                                                | SOS | 1.3 | \$117.00 ✓ |
| --2833A | 02/20/96 | District Attorney Time                                       | SOS | 0.4 | \$36.00 ✓  |
| --2833A | 02/21/96 | Write Letters                                                | SOS | 1.  | \$90.00 ✓  |
| --2833A | 02/21/96 | Meetings, Consultations                                      | SOS | 1.  | \$90.00 ✓  |
| --2833A | 03/05/96 | Review Plans/Reports                                         | SOS | 0.3 | \$27.00 ✓  |
| --2833A | 03/07/96 | Write Letters                                                | SOS | 0.2 | \$18.00 ✓  |
| --2833A | 04/23/96 | Review Plans/Reports                                         | SOS | 0.3 | \$27.00 ✓  |
| --2833A | 04/23/96 | Meetings, Consultations                                      | SOS | 0.1 | \$9.00 ✓   |
| --2833A | 04/29/96 | District Attorney Time                                       | SOS | 0.3 | \$27.00 ✓  |
| --2833A | 07/15/96 | District Attorney Time                                       | SOS | 0.1 | \$9.40 ✓   |
| --2833A | 07/07/97 | Tank Removal (actually, review of 7/97 Enviro-matrix report) | SOS | 0.2 | \$18.80 ✓  |
| --2833A | 09/21/98 | Meetings, Consultations                                      | SOS | 0.1 | \$10.00 ✓  |

-----  
\$3,656.20

Balance:                   -\$56.20   Amount Refunded:

=====

DATE

Hours

| InspDat  | Insp | Act | InspT | StID | DRPro | Comment                                                                                                         | DailBDat |
|----------|------|-----|-------|------|-------|-----------------------------------------------------------------------------------------------------------------|----------|
| 10/01/98 | SOS  | 77  | 1.1   | 1047 | 2833A | calls w/ L.Griffin (OFD); calls w/ NAC reps (2); call w/ B.Bassett (FOSS); discuss case w/ RW                   | 10/23/98 |
| 10/07/98 | SOS  | 77  | 0.5   | 1047 | 2833a | discuss issues w/D.Klettke (PoO); call to W.Ano (NAC)                                                           | 10/23/98 |
| 10/30/98 | SOS  | 76  | 0.8   | 1047 | 2833a | discuss case w/ B.Chambers (DA); cursory review of 10/30/98 corresp package from NAC council                    |          |
| 11/02/98 | SOS  | 71  | 1.7   | 1047 | 2833A | begin case review/evaluation                                                                                    |          |
| 11/02/98 | SOS  | 76  | 0.3   | 1047 | 2833A | call w/ B.Chambers (DA)                                                                                         |          |
| 11/02/98 | SOS  | 77  | 2.5   | 1047 | 2833A | call to OFD re: UST upgrade scope; pick upmrecorsd from OFD and discuss case w/ L. Griffin (OFD)                |          |
| 11/03/98 | SOS  | 73  | 2.6   | 1047 | 2833A | on-site meeting/inspection w/ OFD and NAC; photos; mapping;                                                     |          |
| 11/03/98 | SOS  | 76  | 1.2   | 1047 | 2833A | meeting w/ B.Chambers (DA)                                                                                      |          |
| 11/04/98 | SOS  | 76  | 0.2   | 1047 | 2833a | call from B.Chambers (DA)                                                                                       |          |
| 11/19/98 | SOS  | 75  | 1.3   | 1047 | 2833A | discuss case w/ B.Chambers (DA); review 11/13/98 FOSS report                                                    |          |
| 11/20/98 | SOS  | 77  | 0.1   | 1047 | 2833A | call to N.Shopay (Envirometrix) to inquire about final report                                                   |          |
| 11/23/98 | SOS  | 71  | 1.8   | 1047 | 2833A | file review in prep for tomorrow's meeting w/ NAC                                                               |          |
| 11/23/98 | SOS  | 77  | 0.2   | 1047 | 2833A | call to N.Shopay (Envirometrix)                                                                                 |          |
| 11/24/98 | SOS  | 76  | 0.6   | 1047 | 2833a | discuss case issues w/ DA's                                                                                     |          |
| 11/24/98 | SOS  | 77  | 2.    | 1047 | 2833A | office re: today's meeting on-site meeting w/ NAC reps, consultant, PoO, DA re: UST piping/contamination issues |          |

16.9

Total debits:

$$\$ 3656.20 + \$ 1690 (16.9 \text{ hrs @ } \$ 100 \text{ hr}^{-1}) = \$ 5346.2$$

Total deposits:

$$\$ 2500 + \$ 1100 = 3600$$

---

- \$ 1746.20      Balance

**PORT OF OAKLAND**  
ENVIRONMENTAL DIVISION

OCT 16 1998  
**R E C E I V E D**  
ENVIRONMENTAL DIVISION



ISO 9001 Registered Company

Alameda County 10/14/98

OCT 24 2005

Environmental Health

Department of Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
Attn.: Scott Seery, Hazardous Materials Specialist

Dear Mr. Seery,

On October 1, 1998, during the federally mandated Underground Storage Tank (UST) upgrade at the National Airmotive Corp. Engine Testing Facility, a petroleum based substance was discovered on the surface of ground water by the Foss Environmental and Infrastructure crew led by Mr. Bill Bassett. The substance was tentatively identified as "oil". It was seeping into a portion of the trench (West end) where the old fuel line had been removed and the new system was to be installed. NAC's management was notified and Woody Ano, Facilities/Environmental Manager, and I responded. Subsequently, calls were placed in the following sequence:

1. Mr. Leroy Griffin Oakland Fire Department
2. Mr. Dale Klettke Port of Oakland
3. Mr. Doug Herman Port of Oakland
4. Mr. Scott Seery Alameda County Health Dept.

After reviewing the situation with all parties the following course of action was agreed upon:

- The original permitted scope of work, including fuel line replacement and upgrade to tank being performed by Foss Environmental, would continue and trench would be closed.
- A recovery sump and associated piping has been installed at the West end of the trench.
- A passive skimmer will be used to separate the water from the substance and the substance would be collected for analysis.
- Analysis of recovered substance will be done to determine source.
- Samples of affected soils from the trench have been submitted for analysis.

These actions are being executed and follow-up communications will be disseminated to all parties on an on-going basis as a means of updating as the project proceeds. Please advise us if your agency recommends any additional immediate actions.

Finally, it is our belief that this event should be included in the existing Local Oversight Program (LOP) case and continued under that account. If needed we will make necessary deposits into the account to assure funds are available.

For additional information or if you have questions, please contact Woody Ano or the undersigned at (510)613-1000 or write to: National Airmotive Corp., 7200 Earhart St., Oakland, Ca 94621.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Lorne Dyke".

Lorne Dyke  
Vice-President, Remanufacturing

cc: Leroy Griffin, Oakland Fire Department  
Doug Herman, Port of Oakland ✓  
Dale Klettke, Port of Oakland  
Michael Visconte, Port of Oakland

WA/LD:jm



ENVIRONMENTAL  
PROTECTION

98 OCT 19 PM 4: 44

ISO 9001 Registered Company

Department of Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
Attn.: Scott Seery, Hazardous Materials Specialist

10/14/98

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- 3. Mr. Doug Herman Port of Oakland
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*incorrect*

For additional information or if you have questions, please contact Woody Ano or the undersigned at (510)613-1000 or write to: National Airmotive Corp., 7200 Earhart St., Oakland, Ca 94621.

Sincerely yours,

Lorne Dyke  
Vice-President, Remanufacturing

- cc: Leroy Griffin, Oakland Fire Department
- Doug Herman, Port of Oakland
- Dale Klettke, Port of Oakland
- Michael Visconte, Port of Oakland

WA/LD:jm



# PORT OF OAKLAND

# MEMO

TO: FILE

FROM: DALE KLETTKE, EH&S COMPLIANCE

DATE: OCTOBER 1, 1998

SUBJECT: JET A FUEL CONTAMINATION  
NATIONAL AIRMOTIVE CORPORATION (NAC) - TEST FACILITY  
7200 EARHART ROAD

Alameda County  
OCT 24 2005  
Environmental Health

Today, during my inspection of the LF-12 UST retrofit, being performed by FOSS Environmental (FOSS) for the tank owner and operator (NAC), a Mr. Bill Bassett of FOSS informed me of a JET A fuel release at the NAC Test Facility. The release was perceived to be associated with the underground piping connecting the 10K-gallon Jet A fuel-containing UST to the aboveground manifold piping system. FOSS Environmental had been contracted by NAC to perform the UST retrofit and installation of double-walled underground piping.

Attached is a copy of the photographs documenting the release at the NAC Test Facility. A drain system will be installed by FOSS to capture and remove free product in the trench area. The recovery system will consist of drain rock and a sump to capture any remaining free product in close proximity to the trench.

Samples will be collected which will confirm the type of release (Jet A fuel), before the trench is backfilled and the system put back into operation.

The City of Oakland (Leroy Griffin) was on site to witness the petroleum release. The City of Oakland agreed with the Port that this site will be handled by the County of Alameda, Department of Environmental Protection, under the Local Oversight Program (LOP). It is my understanding that Scott Seery, with the County of Alameda, will be the case worker for this site.

In addition, it appeared that concrete areas surrounding and adjacent to the exposed test cell had recently been cleaned, and the wash waters were being directly discharged to the adjacent property along the west perimeter of the site. Further communications with NAC facility personnel stated that residues from the concrete-sawing operations were washed onto the adjacent property.

c: Michele Heffes, Port Legal  
Michael Visconti, North Airport Properties  
Douglas Herman, Port Stormwater Compliance  
EH&SC files



RETROFIT OF EXISTING 10K-GALON VST  
NAC FACILITY - TEST CENTER  
10/1/98 3:50P.M. - D. HERMAN



FREE PRODUCT IN TRENCH - NAC TEST  
10/1/98 3:40P.M. - D. HERMAN FACILITY



FREE PRODUCT IN TRENCH - NAC TEST  
10/1/98 3:40P.M. - D. HERMAN FACILITY



TRENCH - NAC TEST FACILITY  
10/1/98 3:45P.M. - D. HERMAN



TRENCH SPOILS NAC TEST FACILITY  
10/1/98 3:45P.M. - D. HERMAN





RETROFIT OF EXISTING 10K-GALLON UST  
NAC FACILITY - TEST CENTER  
10/1/98 3:50P.M. - D. HERMAN



FREE PRODUCT IN TRENCH - NAC TEST  
10/1/98 3:40P.M. - DHERMAN FACILITY



FREE PRODUCT IN TRENCH - NAC TEST  
10/1/98 3:40P.M. - DH FACILITY



TRENCH - NAC TEST FACILITY  
10/1/98 3:45P.M. - DHERMAN



TRENCH SPOILS NAC TEST FACILITY  
10/1/98 3:45P.M. - D. HERMAN



ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, DIRECTOR

March 7, 1996

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

Mr. Roger Bastien  
National Airmotive Corporation  
7200 Lockheed Street  
Oakland, CA 94521-4504

RE: NATIONAL AIRMOTIVE CORPORATION (NAC) TEST SITE, EARHART  
ROAD, OAKLAND AIRPORT

Dear Mr. Bastien:

Thank you for the recent submittal of the March 1, 1996  
*Envirometrix Groundwater Investigation Workplan* for the  
installation, sampling and monitoring of three (3) wells at the  
subject site. This workplan has been accepted as submitted.

Please call me at 510/567-6783 when field work associated with  
well installation has been scheduled.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Jun Makishima, Acting Director  
Gil Jensen, Alameda County District Attorney's Office  
William Connell, Esq., Gibson, Dunn & Crutcher  
One Montgomery St., Telesis Tower  
San Francisco, CA 94104-4505  
Norman Shopay, Envirometrix, 3950 Industrial Bl., Ste. 200C  
West Sacramento, CA 95691

# CHECK REQUEST FORM

NA 501

DATE REQUESTED <sup>186796</sup> 2/26/96

COMPANY NAME

Alameda County

VENDOR NAME

E

ADDRESS

CITY, STATE, ZIP CODE

REASON FOR CHECK

Cost incurred by Alameda

County Health Care Services for Environmental Investigations at Test Cell

CHECK NEEDED BY:

3/15/96

Acct # 32930-01

NET CHECK

1100.00

ACCOUNTING DEPT. ONLY

DISTRIBUTION USE

ACCT. NO.

AMOUNT

DESCRIPTION

REFUNDABLE

NON REFUNDABLE

REF./A/C NO.

Add-on

COUNTY OF ALAMEDA  
OFFICE OF THE AUDITOR-CONTROLLER

DATE:

3/7/96

## MISCELLANEOUS RECEIPT

Payor 853A  
Site # 2833

\$ 1,100.00

DOLLARS

RECEIVED FROM:

NAC - Oakland Intl Airport; 7200 Lockheed St. Oakland 94602

FOR:

NAC Test Site Std 1047

Earhart Rd, Oakland Airport

RECEIVED BY:

N. Arreguin

DEPT. NO.:

430-4530

CASH

PERSONAL/CASHTER'S CHECK/M. O. # 090154

OTHER:

2/2/96

ALAMEDA COUNTY  
HEALTH CARE SERVICESAGENCY  
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, DIRECTOR

February 21, 1996

DEPARTMENT OF ENVIRONMENTAL HEALTH  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6700Mr. Roger Bastien  
National Airmotive Corporation  
7200 Lockheed Street  
Oakland, CA 94521-4504RE: ENVIRONMENTAL INVESTIGATIONS - NATIONAL AIRMOTIVE  
CORPORATION (NAC) TEST SITE, EARHART ROAD, OAKLAND AIRPORT

Dear Mr. Bastien:

This letter is intended to summarize particular facts and final actions agreed upon during our meeting today attended by yourself and Mr. Cliff Maupin of NAC, Mr. William Connell of the law firm of Gibson, Dunn & Crutcher, NAC's legal representative on this matter, and Mr. Gil Jensen, Alameda County District Attorney's Office. Our meeting convened following this office's receipt and my review of the January 16, 1996 EMCON report entitled "Soil and Groundwater Investigation, National Airmotive Corporation Facility, Oakland, California" in order to discuss what final actions may be needed to complete the Jet-A fuel release and "gray water" investigations at the subject NAC site.

We understand that it is NAC's intent to upgrade the underground storage tank (UST) complex where appropriate in order to comply with UST standards that will take affect December 1998. We also understand that EMCON has recommended that NAC monitor for the presence of free-phase product in the UST pit at that time, and to remove such product if observed. This action is acceptable to this office.

In order to ensure the jet fuel plume is stable and not migrating towards the tidal marsh immediately east of the test site, and to move this case towards final closure, we request that three (3) monitoring wells (aka "guardian" wells) be installed in the general locations we discussed today. I have enclosed an annotated site map on which these generalized well locations are illustrated.

Ground water samples shall be collected from each well on an annual basis for two years after installation, for a total of three (3) sampling events (initial, 1st annual, and 2nd annual). Should concentrations of targeted jet fuel constituents in sampled water suggest that the plume is stable and not discharging into the tidal marsh, or plume constituents are below levels of concern based on toxicity values for estuarine organisms, no further action will be required.

Mr. Roger Bastien  
RE: National Airmotive Corp. Test Site  
February 21, 1996  
Page 2 of 2

Please have your consultant submit a brief work plan for the installation of the noted monitoring wells which incorporates, among others, the following elements:

- 1) Target compounds for analysis of sampled ground water shall be TPH characterized as jet fuel (TPH-Jf), and BTEX. Should "hits" for TPH be identified in any samples, also analyze for SVOC.
- 2) Soil samples need not be collected for chemical analysis, although you may choose to collect such samples for routine lithologic determination.
- 3) Water elevation and flow direction/gradient shall be determined from well gauging during the initial and subsequent sampling events.
- 4) Subsequent annual sampling events shall occur during the 1st quarter of each sample year.

As we additionally discussed, the current account established in January 1995 to offset costs incurred by this agency during its oversight of your case is presently in arrears. Please remit an additional draft, made payable to Alameda County, in the amount of \$1100. I anticipate that this additional deposit should be sufficient to make up the current deficit and fund the project to closure.

Thank you for your attention to these issues. Please call me at 510/567-6783 should you have any questions or comments.

Sincerely,

  
\_\_\_\_\_  
Scott O. Seery CHMM  
Senior Hazardous Materials Specialist

enclosure

cc: Jun Makishima, Acting Director  
Gil Jensen, Alameda County District Attorney's Office  
William Connell, Esq., Gibson, Dunn & Crutcher  
One Montgomery St., Telesis Tower  
San Francisco, CA 94104-4505

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



#1047

wkshrd

cpt# 783452

RAFAT A. SHAHID, DIRECTOR

February 21, 1996

DEPARTMENT OF ENVIRONMENTAL HEALTH  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
(510) 567-6720

Mr. Roger Bastien  
National Airmotive Corporation  
7200 Lockheed Street  
Oakland, CA 94521-4504

payor 853a  
site# 2833

RE: ENVIRONMENTAL INVESTIGATIONS - NATIONAL AIRMOTIVE  
CORPORATION (NAC) TEST SITE, EARHART ROAD, OAKLAND AIRPORT

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RE: National Airmotive Corp. Test Site  
February 21, 1996  
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Sincerely,

  
Scott O. Seery CHMM  
Senior Hazardous Materials Specialist

enclosure

cc: Jun Makishima, Acting Director  
Gil Jensen, Alameda County District Attorney's Office  
William Connell, Esq., Gibson, Dunn & Crutcher  
One Montgomery St., Telesis Tower  
San Francisco, CA 94104-4505

090154


03/05/96

| INVOICE DATE | YOUR INVOICE NUMBER | P.O. # | DOC. TYPE | AMOUNT PAID | DISCOUNT TAKEN | NET CHECK AMOUNT |
|--------------|---------------------|--------|-----------|-------------|----------------|------------------|
| 022696       | TEST CELL           |        | INVOICE   | 1100.00     |                | 1100.00          |
|              |                     |        |           |             |                | 1100.00          |

ENVIRONMENTAL  
 PROTECTION  
 95 MAR 6 PM 1:29

03/05/96

090154

  
 OAKLAND INT'L AIRPORT / 7200 LOCKHEED STREET  
 P.O. BOX 6069 / OAKLAND, CALIFORNIA 94603-0069  
 TEL: (510) 613-1000

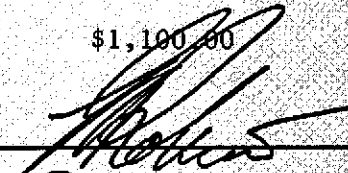
NCNB OF NORTH CAROLINA  
 ASHEVILLE, NORTH CAROLINA

66-798  
 531

PAY ONE THOUSAND ONE HUNDRED DOLLARS AND NO CENTS

TO THE ORDER OF DEPARTMENT OF ENVIRONMENTAL HEALTH  
 1131 HARBOR BAY PARKWAY  
 ALAMEDA, CA 94502-6577

\$1,100.00

  
 Rajshama  
 AUTHORIZED SIGNATURE

⑈090154⑈ ⑆053107989⑆ 480024488⑈

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

February 20, 1996

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

Mr. Dale Bowyer  
California Regional Water Quality Control Board,  
San Francisco Bay Region  
2101 Webster Street. Ste. 500  
Oakland, CA 94612

RE: NORTH PORT OF OAKLAND REFUSE DISPOSAL SITE, PARCEL B

Dear Mr. Bowyer:

This letter is in follow-up to our conversation on February 15 during which we discussed issues related to both storm water runoff and leachate derived from the subject closed landfill and the adjoining National Airmotive Corporation (NAC) test facility, located along Earhart Road, Oakland Airport. The NAC test site appears to be partially underlain by the eastern edge of the subject landfill.

As we discussed, the June 27, 1990 Golder Associates, Inc. report entitled "*Final Report, Solid Waste Assessment Test (SWAT) for the North Port of Oakland Refuse Disposal Site*" identifies the presence of both volatile organic compounds and semivolatile organic compounds (VOC and SVOC, respectively), as well as metals in shallow ground water sampled between approximately November 1989 and May 1990 from both wells and temporary sample points within and along the boundaries of the subject landfill. Surface water samples were also collected during the reported study period in which VOC, SVOC and metals were also detected. The cited SWAT report concludes that the presence of organic compounds in sampled ground water from the southeast portion of the site (that portion adjoining the NAC test site) is from a source not associated with the landfill.

This office is currently in the process of investigating the extent of both a 1992 release of Jet-A fuel from an above ground tank to the uncapped backfill of an underground storage tank (UST) cluster, and a "gray water" discharge to an unlined storm water culvert located along the border of the landfill and NAC test facility. You will see in the enclosed January 16, 1996 EMCON report entitled "*Soil and Groundwater Investigation, National Airmotive Corporation Facility, Oakland, California*" that certain VOC, SVOC and metals were identified in both ground water, and surface and near-surface soil materials encountered during the 1995 investigation.



Mr. Dale Bowyer  
RE: No. Port of Oakland Refuse Disposal Site  
February 20, 1996  
Page 2 of 3

Certain of the metals identified (e.g., lead) in soil samples collected from a few locations exceed current hazardous waste levels, or are at such concentrations that would ordinarily require further evaluation to determine whether their *soluble* concentrations would exceed hazardous waste levels. **Their source, however, appears to be from soil materials incorporated into the fill overlying the landfill site, and not from the known releases occurring at the NAC facility.** While it is unknown during what period of time deposition of the landfill cap occurred, I have been informed that as recently as a year ago the District Attorney's Office received reports of [at that time] recent deposition of foreign "fill" materials at the airport site in general.

The presence and distribution of organic compounds in shallow soil materials appear to be dependent upon the sample location. Certain organic compounds identified during this study appear to be as a result of the Jet-A fuel release and "gray water" discharge at the NAC test site, and others do not. **All elevated concentrations of apparent Jet-A fuel constituents in sampled soil materials are limited to the area directly proximal to the UST cluster, as one would expect.** Significantly lower concentrations of a limited number of specific organic compounds were discovered in samples collected from the unlined storm water culvert during the "gray water" investigation.

No surface water samples were collected during the 1995 EMCON study. Ground water samples were collected, however, from each of the 14 boreholes. **Laboratory data indicate concentrations of apparent jet fuel constituents in groundwater samples near the UST cluster, but not spots in the area of the unlined storm water culvert.** Dissolved metal concentrations in ground water sampled from particular boreholes were either below laboratory detection limits or at low levels.

Because ground water samples were collected through boreholes rather than from developed wells, it is unclear whether reported concentrations are true representations of ambient ground water conditions. This is particularly noteworthy where such samples were collected from those boreholes penetrating the bed of the unlined storm water culvert. Because the identified organic compounds have a proclivity for adsorption to sediments, any which may be incorporated into the sediments at the base of the culvert could, as an inherent consequence of drilling activities, be pulled into the underlying ground water present at shallow depth ( $\leq 1'$  below grade), becoming entrained in the sampled water.

Mr. Dale Bowyer  
RE: No. Port of Oakland Refuse Disposal Site  
February 20, 1996  
Page 3 of 3

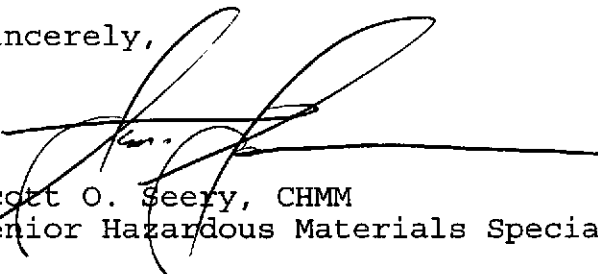
As you know, surface water collects at a pumping station located a short distance southeast of both the subject landfill and NAC test site. Collected water is subsequently pumped into a tidal marsh located immediately east of Earhart Road which feeds into nearby San Leandro Bay. You were not aware that water discharged to San Leandro Bay in this fashion is tested for the presence of contaminants.

Some of the water which accumulates at the pumping station appears to be derived from run-off (and probable discharge of leachate in ground water) from both the landfill and NAC test site. Run-off is transported via the unlined storm water culvert located along the southwestern flank of the NAC test site and southern border of the landfill discussed previously, through a pipe penetrating the levee bordering the landfill to the south, and eventually flowing to the pond serving the pump station.

It would appear that, based on the potential genesis of this surface water, discharges to the tidal marsh would be subject to a NPDES permit evaluation and consequent testing prior to discharge.

I hope that the enclosed information is useful to you during your evaluation of this issue. Please call me at (510) 567-6783 if I can be of additional assistance.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

enclosure

cc: Jun Makishima, Acting Director  
Gil Jensen, Alameda County District Attorney's Office  
Susa Gates, Port of Oakland, Environmental Department

GIBSON, DUNN & CRUTCHER

LAWYERS

ONE MONTGOMERY STREET  
TELESIS TOWER

SAN FRANCISCO, CALIFORNIA 94104-4505

(415) 393-8200

FACSIMILE: (415) 986-5309

February 7, 1996

JAS. A. GIBSON, 1852-1922  
W. E. DUNN, 1861-1925  
ALBERT CRUTCHER, 1860-1931

LOS ANGELES

333 SOUTH GRAND AVENUE  
LOS ANGELES, CALIFORNIA 90071-3197

CENTURY CITY

2029 CENTURY PARK EAST  
LOS ANGELES, CALIFORNIA 90026

ORANGE COUNTY

4 PARK PLAZA  
IRVINE, CALIFORNIA 92714-8557

SAN DIEGO

750 B STREET  
SAN DIEGO, CALIFORNIA 92101-4805

DALLAS

1717 MAIN STREET  
DALLAS, TEXAS 75201-7390

DENVER

1801 CALIFORNIA STREET  
DENVER, COLORADO 80202-2694

WRITER'S DIRECT DIAL NUMBER

(415) 393-8342

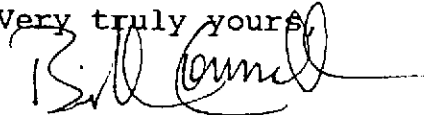
Gilbert A. Jensen  
Sr. Deputy District Attorney  
District Attorney's Office  
7677 Oakport Street, Suite 400  
Oakland, Calif. 94621

Re: People v. National Airmotive Corporation  
Case No. H-179506-2

Dear Mr. Jensen:

Confirming our telephone conversation yesterday afternoon, we have scheduled a meeting for Wednesday, **February 21, 1996, at 11:00 a.m.**, at Scott Seery's offices at 1131 Harbor Bay Parkway, Alameda. Please let me know if you need any additional information from us before the meeting. Thank you.

Very truly yours,



William D. Connell

cc: Scott O. Seery, CHMM  
National Airmotive Corporation

FA960380.011/1+

NEW YORK  
200 PARK AVENUE  
NEW YORK, NEW YORK 10166-0193

WASHINGTON  
1050 CONNECTICUT AVENUE, N.W.  
WASHINGTON, D.C. 20036-5306

PARIS  
104 AVENUE RAYMOND POINCARÉ  
75116 PARIS, FRANCE

LONDON  
30/35 PALL MALL  
LONDON SW1Y 5LP

HONG KONG  
10TH FLOOR, TWO PACIFIC PLACE  
88 QUEENSWAY  
HONG KONG

TOKYO  
TORANOMON 3-CHOME ANNEX BLDG.  
3-7-12 TORANOMON, MINATO-KU  
TOKYO 105, JAPAN

AFFILIATED SAUDI ARABIA OFFICE  
JARIR PLAZA, OLAYA STREET  
P.O. BOX 15870  
RIYADH 11454, SAUDI ARABIA

OUR FILE NUMBER

T 64324-00012

GIBSON, DUNN & CRUTCHER

LAWYERS

ONE MONTGOMERY STREET  
TELESIS TOWER

SAN FRANCISCO, CALIFORNIA 94104-4505

(415) 393-8200

FACSIMILE: (415) 986-5309

November 6, 1995

JAS. A. GIBSON, 1852-1922  
W. E. DUNN, 1861-1925  
ALBERT CRUTCHER, 1880-1931

LOS ANGELES

333 SOUTH GRAND AVENUE  
LOS ANGELES, CALIFORNIA 90071-3197

CENTURY CITY

2029 CENTURY PARK EAST  
LOS ANGELES, CALIFORNIA 90067-3026

ORANGE COUNTY

4 PARK PLAZA  
IRVINE, CALIFORNIA 92714-8557

SAN DIEGO

750 B STREET  
SAN DIEGO, CALIFORNIA 92101-4805

DALLAS

1717 MAIN STREET  
DALLAS, TEXAS 75201-7390

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1801 CALIFORNIA STREET  
DENVER, COLORADO 80202-2694

WRITER'S DIRECT DIAL NUMBER

(415) 393-8342

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Sr. Deputy District Attorney  
District Attorney's Office  
7677 Oakport Street, Suite 400  
Oakland, Calif. 94621

Re: People v. National Airmotive Corporation  
Case No. H-179506-2

Dear Mr. Jensen:

On behalf of National Airmotive Corporation ["NAC"] and Messrs. Bastien and Maupin, I would like to thank you and Mr. Seery for taking the time to meet with us on October 19, 1995, to discuss the status of the work pursuant to the Stipulation and Consent Order in the above-referenced matter. I believe that the discussion we had was helpful and am encouraged that the project appears to be moving toward a satisfactory resolution.

Per our agreement, this letter is to confirm the understanding reached by the parties with respect to an extension of time for the "credit accounting" specified in Paragraph (5) of the Stipulation and Consent Order. Specifically, we agreed that the time period specified in Paragraph (5)(I) shall be extended such that the parties will meet again not later than thirty (30) days following the receipt of NAC's consultant's final report on the investigation to be completed with respect to the "Jet-A fuel spill" area and the "gray water" area to determine what remedial work, if any, needs to be completed. At that time, the parties will also determine a mutually agreeable date for the submission of the accounting and the payment, if any, with

NEW YORK  
200 PARK AVENUE  
NEW YORK, NEW YORK 10166-0193

WASHINGTON  
1050 CONNECTICUT AVENUE, N.W.  
WASHINGTON, D.C. 20036-5306

PARIS  
104 AVENUE RAYMOND POINCARÉ  
75116 PARIS, FRANCE

LONDON  
30/35 PALL MALL  
LONDON SW1Y 5LP

HONG KONG  
10TH FLOOR, TWO PACIFIC PLACE  
88 QUEENSWAY  
HONG KONG

TOKYO  
TORANOMON 3-CHOME ANNEX BLDG.  
3-7-12 TORANOMON, MINATO-KU  
TOKYO 105, JAPAN

AFFILIATED SAUDI ARABIA OFFICE  
JARIR PLAZA, OLAYA STREET  
P.O. BOX 15870  
RIYADH 11454, SAUDI ARABIA

OUR FILE NUMBER

T 64324-00012

GIBSON, DUNN & CRUTCHER

Gilbert A. Jensen, Esq.  
November 6, 1995  
Page 2

respect to the credit amount funds. Per our discussion, it is anticipated that this meeting will likely occur within sixty to ninety days from now.

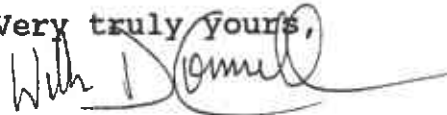
We further agreed that a copy of the consultant's final report will be provided to Mr. Seery at the same time as it is provided to NAC.

We also agreed that the parties would consider this letter understanding binding in lieu of making a formal motion to the Court to amend the existing Stipulation and Consent Order.

If any of the foregoing does not reflect your understanding of our discussion, please give me a call at your earliest convenience. Otherwise, I would appreciate it if you would acknowledge the foregoing understanding, where indicated, on the enclosed copy and return it to me for my files.

Thank you again for your cooperation and courtesy in this matter.

Very truly yours,



William D. Connell

cc: Mr. Scott Seery  
National Airmotive Corporation

I hereby acknowledge and agree to the terms set forth above.

---

Gilbert A. Jensen



ALAMEDA COUNTY  
DISTRICT ATTORNEY'S  
OFFICE

CONSUMER & ENVIRONMENTAL  
PROTECTION DIVISION

FACSIMILE TRANSMITTAL

TO: 337-9335  
Fax Phone Number

DATE: 9-26-95

NAME: Scott Seery

AGENCY: \_\_\_\_\_

FROM: (510) 569-0505  
Fax Phone Number

SENDER: Dil Jensen

SPECIAL INSTRUCTIONS/COMMENTS: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

NUMBER OF PAGES: 2

IF PROBLEMS, PLEASE CALL: (510) 569-9281

SEP-15-1995 12:51 FROM

D & C -- SAN FRANCISCO

1-310000000

**GIBSON, DUNN & CRUTCHER**

One Montgomery Street  
Telecom Tower  
San Francisco, California 94104-4505

TELEPHONE: (415) 393-8200

FACSIMILE: (415) 986-5309

**FACSIMILE TRANSMISSION INFORMATION**

September 15, 1995

TO: Mr./Ms.: Gabert A. Jensen

Company: District Attorney's office

City/State: Oakland, Calif.

Facsimile No.: 910-569-0505

Main Telephone: \_\_\_\_\_

FROM: William D. Connell

Room 3164

Direct Dial (415) 393-8342

**TOTAL NUMBER OF PAGES, INCLUDING COVER LETTER:** \_\_\_\_\_

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Fax Operator \_\_\_\_\_

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SENDER

## GIBSON, DUNN &amp; CRUTCHER

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ONE MONTGOMERY STREET

TELESBIS TOWER

SAN FRANCISCO, CALIFORNIA 94104-4303

(415) 393-8200

FACSIMILE: (415) 386-5309

September 15, 1995

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DISTRICT ATTORNEY  
ALAMEDA COUNTY  
CEPD

## NEW YORK

200 PARK AVENUE  
NEW YORK, NEW YORK 10166-0103

## WASHINGTON

1030 CONNECTICUT AVENUE, N.W.  
WASHINGTON, D.C. 20038-3308

## PARIS

104 AVENUE RAYMOND POINCARÉ  
75116 PARIS, FRANCE

## LONDON

20/25 FLEET STREET  
LONDON SW1P 4LP

## HONG KONG

10TH FLOOR, TWO PACIFIC PLACE  
88 QUEENSWAY  
HONG KONG

## TOKYO

TORANOMON 3-CHOME ANNEX BLDG.  
3-7-12 TORANOMON, MINATO-KU  
TOKYO 105, JAPAN

## AFFILIATED SAUDI ARABIA OFFICE

JABIR PLAZA, OLAYA STREET  
P.O. BOX 15470  
RITADH 11454, SAUDI ARABIA

OUR FILE NUMBER

T 64324-00012

JAS. A. GIBSON, 1852-1922  
W. E. DUNN, 1861-1925  
ALBERT CRUTCHER, 1860-1931

## LOS ANGELES

333 SOUTH GRAND AVENUE  
LOS ANGELES, CALIFORNIA 90071-3107

## CENTURY CITY

2029 CENTURY PARK EAST  
LOS ANGELES, CALIFORNIA 90067-3029

## ORANGE COUNTY

4 PARK PLAZA  
IRVINE, CALIFORNIA 92714-8557

## SAN DIEGO

700 B STREET  
SAN DIEGO, CALIFORNIA 92101-4605

## DALLAS

1717 MAIN STREET  
DALLAS, TEXAS 75201-7320

## DENVER

1801 CALIFORNIA STREET  
DENVER, COLORADO 80202-2844

WRITER'S DIRECT DIAL NUMBER

(415) 393-8342

VIA FACSIMILE AND MAIL

Gilbert A. Jensen  
Sr. Deputy District Attorney  
District Attorney's Office  
7677 Oakport Street, Suite 400  
Oakland, Calif. 94621

Re: People v. National Airmotive Corporation  
Case No. H-179506-2

Dear Mr. Jensen:

I am writing to follow up on my letter to you of June 6, 1995, regarding the status of National Airmotive's activities under the Stipulation and Consent Order in the above-referenced matter. As you may recall, in that letter I advised of a potential concern arising with respect to the work relating to Paragraphs 5(C) and 5(D), the Jet-A fuel spill and "gray water" situations, respectively. At that time, NAC had been working for several months with Scott Seery, Department of Environmental Health, to develop and implement appropriate investigatory and remedial measures. Borings had already been done on the NAC premises with respect to the Jet-A fuel spill area.

Both of those projects, however, also required work (i.e., borings and/or possible monitoring wells or other work) off of the NAC leased premises and on adjacent Port of Oakland property. In order to implement the investigation approved by Mr. Seery, NAC sought to obtain permission from the Port of Oakland for access to its property. The Port, however, raised several objections in that regard, and NAC ran into



## GIBSON, DUNN &amp; CRUTCHER

Gilbert A. Jensen, Esq.  
September 15, 1995  
Page 2

substantial delays as efforts were undertaken to try and overcome these objections. As a result, I wrote to give you a "heads up" regarding NAC's concern that, despite its diligent efforts and through no fault of its own, it would not be able to complete and/or commit to a sufficient amount of work by the one-year deadline specified in Paragraph 5(I) of the Order to receive the full amount of the \$125,000 potential credit for investigation and remediation work to which it should be entitled.

I am pleased to report that NAC and the Port have recently worked out an agreement that will at least allow NAC to undertake the initial boring and sampling on adjacent Port property. NAC is now in the process of confirming its ability to meet a variety of insurance and other obligations insisted upon by the Port, but NAC is optimistic that it will be in a position actually to undertake the work in the near future. Nevertheless, as a result of the unanticipated several month delay, it looks likely now that the expenditures during the specified one-year period may not reach the \$125,000 amount, even though it is virtually certain that the amount to be spent by NAC on these projects will greatly exceed that amount over the next several months.

For your information, a rough accounting indicates that approximately \$73,500 has been spent to date on projects under the Stipulation and Consent Order. NAC currently anticipates that approximately \$27,000 -- for a rough total of \$100,500 -- will be spent by the end of September, 1995. However, at that time the actual remediation work that may be required for the Jet-A fuel spill and "gray water" situation will still remain to be done and paid for. As noted above, it is almost a certainty that the cost of such work will greatly exceed the remaining approximately \$25,000 of credit. Indeed, preliminary evaluations by two different environmental consultants both indicate that anticipated remediation work may cost well over \$150,000 or more.

In light of the foregoing, NAC is now requesting a stipulation to extend the one-year period specified in Paragraph 5(I) of the Stipulation and Consent Order by an additional five (5) months, to and including March 31, 1996. This request is justified in light of the fact that the delay was unanticipated, the requested extension is reasonably short, and the amount involved will clearly be spent as intended. In short, NAC believes that the requested amendment allows for implementation of the spirit of the original stipulation and Consent Order negotiated by the parties.

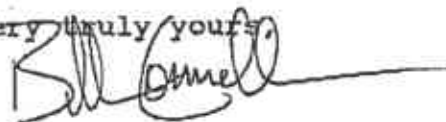
GIBSON, DUNN & CRUTCHER

Gilbert A. Jensen, Esq.  
September 15, 1995  
Page 3

Please let me know at your earliest opportunity if you are agreeable to such a stipulation. If so, I will prepare one for your review and signature. If you have any additional questions before deciding, please give me a call at your earliest convenience. As indicated in my earlier letter, in the absence of a stipulation, NAC would file a motion with the Court (which, I believe, retains jurisdiction on issues such as this by terms of the Consent Order) seeking this relief. We are, of course, optimistic that the matter can be resolved without the need for a formal motion. To that end, I look forward to hearing from you at your earliest convenience.

Thank you very much for your attention to this matter.

Very truly yours,



William D. Connell

cc: National Airmotive Corporation

FA952550.002/3+



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

MEMORANDUM

TO: Gil Jensen, Alameda County District Attorney's Office  
FROM: Pam Evans, Alameda County Environmental Health  
SUBJECT: **National Airmotive Corporation Stipulation**  
DATE: August 3, 1995

As we discussed about two weeks ago, I would like to allow for some flexibility in the way NAC carries out their Stipulation (case # H-179506-2). I am referring to item G., pages 4 and 5, which calls for NAC to develop a plan for the preparation of a curriculum for use in a single day training for county personnel as well as for interested industries, generally regarding:

1. implementing environmental assessments
2. waste handling procedures
3. minimization of hazardous waste
4. pollution prevention procedures

NAC was ordered to make available to this Department, at no expense to us, NAC staff or outside consultants for curriculum and materials development as well as presentation of a one day training by October 17, 1995.

I have discussed the following alternatives with Cliff Maupin of NAC and his consultants:

1. Develop and carry out a workshop essentially as outlined above; or
2. Integrate employee training and contingency planning educational activities into the Department's existing training program for industry. We will present a series of 5-6 workshops over the next year to our most common industry types and would like NAC or their consultant to develop and present modules on employee training and contingency planning requirements found in Title 22, or process specific pollution prevention at 2 or more such workshops. We would be looking for NAC to expend an amount of time and money roughly equivalent to what they would need to for alternative 1.

The educational consultants, Envirometrix Corporation, seemed comfortable with alternative 2, but Cliff Maupin has expressed some reservations. I supplied him with some background information on comparative costs and commitment levels for the two alternatives. I have given him until August 15 to think about the subject. At that time we will discuss the direction for the training program.

I am interested in your input at this point, <sup>(b)(1) 207-0/00</sup> because one of Cliff Maupin's concerns is that he may stray too far from the intent of the Stipulation. At your earliest convenience, I would like to verify with you that alternative 2 would be acceptable to your office.

c: Ariu Levi, Supervising Hazardous Materials Specialist  
Scott Seery, Senior Hazardous Materials Specialist

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY  
MEMORANDUM

TO GIL JENSEN FROM SCOTT SEERY DATE 6-7-95  
SUBJECT NAT'L AIRMOTIVE CORP (NAC)

Gil - Apparently, and according to the Port of Oakland's Patricia Murphy, NAC has not kept the Port apprised of the environmental investigations to be performed at the NAC test cell facility. Reportedly NAC has refused to supply the Port with any of the documents relating to this subject, so I did. The attached letter, addressed to NAC's Gerry Roberts, requests that NAC supply whatever documents may be generated in the future. Also, the Port's attorney's are reportedly working <sup>on</sup> some document which I understand to be called a "tolling agreement," apparently having to do with CERCLA statute of limitations, or so I've been informed by Ms. Murphy. I've requested a copy when completed.



# PORT OF OAKLAND

June 5, 1995

STEVEN J. GROSSMAN  
*Director of Aviation*

WILLIAM E. WEST  
*Manager, Airport Properties Department*

9532 Earnart Road  
Oakland, CA 94621

Telephone: (510) 577-4233  
Fax: (510) 636-1216

Mr. Gerry Roberts  
President  
National Airmotive Corporation  
7200 Lockheed Street  
Oakland, CA 94621

Dear Mr. Roberts:

I want to express my continued support for your efforts to identify and characterize whether soil and groundwater contamination occurred as a result of the jet fuel spill at your Metropolitan Oakland International Airport engine test facility during September of 1992. Port Environmental Department staff has recently obtained plans from Alameda County for additional soil and groundwater testing at the test facility.

In order to facilitate the Port's timely review of your investigation and potential remediation plans in the future, please send all documentation to the Port's Environmental Department Manager, James McGrath. All documents describing proposed sampling and remediation on Port-owned property should be sent to Mr. McGrath at the same time they are sent to regulatory agencies such as Alameda County.

In addition, please send to James McGrath copies of any existing documents that National Airmotive Corporation, or its consultants, have generated regarding the spill and other environmental compliance issues as well as all documents that you have received from environmental regulatory agencies. The transmittal of documents should include the DTSC Report of Violations, dated June 29, 1994, mentioned in the settlement agreement between National Airmotive Corporation and the State of California and the results of the recent sampling effort that took place at your test facility. The following documents were already transmitted to the Port of Oakland Environmental Department by the County of Alameda:

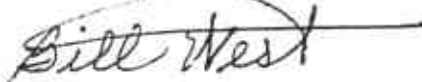
1. May 24, 1994, Letter to Mr. Roger Bastien of National Airmotive from Mark Smolley of EMCON Associates, RE: Test Cell Sampling Plan;
2. August 12, 1994, Letter to Mr. Roger Bastien of National Airmotive from Mark Smolley of EMCON Associates, RE: Test Cell Sampling Plan;
3. February 17, 1995, Letter to Mr. Roger Bastien of National Airmotive from Mark Smolley of EMCON Associates, RE: Test Cell Sampling Plan;

Page Two  
Mr. Roberts

4. March 14, 1995, Letter to Mr. Roger Bastien of National Airmotive from Mark Smolley of EMCON Associates, RE: Test Cell Sampling Plan;
5. June 28, 1994, Jonas & Associates, Inc., "Evaluation of Storm & Wastewater Management at the Engine Test Facility";
6. October 21, 1994, Stipulation for Consent Judgement between The People of the State of California and National Airmotive Corporation.

Thank you for your cooperation in this matter. Although your primary contact regarding this issue will be James McGrath at 272-1175, please feel free to contact Michael Visconti any time at 577-4247 to discuss this issue.

Sincerely,



William West  
Manager of Airport Properties

cc: Scott O. Seery, Alameda County Division of Environmental Protection, 1131 Harbor Bay Parkway, 2nd Floor, Alameda, CA 94502



PORT OF OAKLAND  
ENVIRONMENTAL  
DEPARTMENT  
530 WATER STREET,  
5TH FLOOR  
OAKLAND, CA 94607  
FAX (510) 465-3755  
PHONE (510) 272-1174

| FACSIMILE TRANSMITTAL |                 |
|-----------------------|-----------------|
| TO                    | Scott Seery     |
| ATTENTION             |                 |
| FROM                  | Patricia Murphy |
| DATE & TIME           |                 |
| FAX NUMBER            | 337-9335        |
| NO. OF PAGES          | 5               |

5/18/95

Scott-

I received the attached from National Airmoterial + want to pass it along to you since I note you were not copied (explicitly). Please note that National has agreed not to take the background sample initially. Since this changes the workplan the Co. approved, you should be aware of it. I did tell EMCON, National's representative that the Port would allow background sampling, (if locations are specified + authorized) if first round sampling warrants it. Call me with questions at 272-1373. Patricia



**PORT OF OAKLAND**





ENVIRONMENTAL  
PROTECTION

95 MAY 22 PM 3: 03

May 17, 1995

Scott O. Seery  
Senior Hazardous Materials Specialist  
1131 Harbor Bay Parkway, 2nd Floor  
Alameda, CA 94502

Reference: Letter on drilling work plan sent to Port of Oakland.

Dear Mr. Seery;

Scott enclosed is the letter we sent to the Port along with the maps on boring locations. Michael Visconti is are property manager who is trying to expedite the process. He came by on Wednesday to hand carry the letter and Jonas Report to Ms. Patricia Murphy. If you have any questions please call me at (510)-613-1017, if not I will call you as soon as I hear from the Port.

Best Regards;

A handwritten signature in cursive script that reads "Cliff Maupin". The signature is written in dark ink and is positioned above the printed name.

Cliff Maupin  
Manager  
Facilities & Environmental



March 22, 1995

Charles W. Foster  
Deputy Executive Director  
Port of Oakland  
530 Water Street  
P. O. Box 2064  
Oakland, California 94604-2064

Reference: National Airmotive Corporation/Environmental Matters

Dear Mr. Foster:

You will probably recall correspondence over the course of the past several months regarding environmental investigation and remediation work to be undertaken by National Airmotive Corporation ("NAC") with respect to certain conditions at or near the Test Cell Facility. I am pleased to report that we have made substantial progress in this regard and are now at the stage of commencing on-site work under the supervision of the Alameda County Health Care Services Agency, Environmental Protection Division.

In your letter of June 29, 1994, you indicated the Port's request that NAC prepare plans for investigation of potential groundwater and surface water contamination situations and remediation of contamination, if any, that may have resulted from NAC's activities. Working with an outside consultant, we have prepared those plans, submitted them to the County, and received approval to begin work, which we are anxious to do.

As I indicated in my previous correspondence, we will need to coordinate with, and request the cooperation of, the Port, in that some of this work will require access to Port property adjacent to the Test Cell Facility. In addition, the County has requested that we install various monitoring wells and/or equipment on property adjacent to the Test Cell Facility, as well as at the Facility itself.

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ALAMEDA COUNTY  
**HEALTH CARE SERVICES**

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

February 24, 1995

Alameda County CC4580  
 Environmental Protection Division  
 1131 Harbor Bay Parkway, Room 250  
 Alameda CA 94502-6577

Mr. Roger Bastien  
 National Airmotive Corporation  
 7200 Lockheed Street  
 Oakland, CA 94521-4504

RE: ENVIRONMENTAL INVESTIGATIONS - NATIONAL AIRMOTIVE CORPORATION TEST SITE, EARHART ROAD, OAKLAND AIRPORT

Dear Mr. Bastien:

I am in receipt of the February 17, 1995 EMCON letter discussing target analytes for the pending investigations at the National Airmotive Corporation (NAC) test facility. The cited EMCON letter responds to one from this agency dated February 8, 1995 sent following agency review of May 24 and August 12, 1994 EMCON work plans.

As discussed in the February 8, 1995 correspondence from this office, the June 27, 1990 Golder Associates report entitled, "Final Report, Solid Waste Assessment Test for the North Port of Oakland Refuse Disposal Site," presents data collected from soil borings, surface water samples, and ground water samples collected from completed monitoring wells. Various metals were detected in both surface and ground water from sample points located proximal to the NAC test facility, several of which were present in concentrations above their respective MCLs, including lead, mercury and selenium. The halogenated volatile organic compounds (HVOC) 1,1,1-TCA and 1,2-DCA (trans/cis) were also detected, as were several semi-volatile organic compounds (SVOC).

EMCON correctly notes the absence of HVOCs in tested effluent water (as discussed in the June 28, 1994 Jonas & Associates, Inc.

---

# Facsimile Cover Sheet

**To:** Scott Seery, CHMM  
**Company:** Alameda County Environmental  
Health Care Services  
**Phone:** 510.567.6783  
**Fax:** 510.337.9335

**From:** Roger I Bastien  
**Company:** National Airmotive Corp.  
**Phone:** 510-613-1012  
**Fax:** 510-635-6911

**Date:** 03/15/95

**Pages including this  
cover page:** 31

**Comments:** Scott please take a look as the  
recommendations from EMCON on our project and let  
me know if its a go.

Thanks



March 14, 1995  
Project 2077-001.01

Mr. Roger Bastien  
National Airmotive Corporation  
7200 Lockheed Street  
Oakland, California 94321-4504

Re: Response to ACHCS request for additional analyses

Dear Mr. Bastien:

EMCON has reviewed the February 24, 1995, response letter from the Alameda County Health Care Services (ACHCS), which discusses its rationale for additional analyses of samples to be collected in the "Gray Water" investigation area at the National Airmotive Corporation (NAC) facility. EMCON had previously provided comments to NAC that the halogenated volatile organic compounds (HVOCs) and California Assessment Manual (CAM) 17 Metals analyses requested by the ACHCS were for compounds that had not been detected, or were not present in concentrations above maximum contaminant levels (MCLs), in effluent samples collected at NAC (*Evaluation of Storm & Wastewater Management at the Engine Test Facility*, Jonas & Associates, June 28, 1994).

In its response letter, ACHCS indicated its intention for NAC to address the compounds detected in soil and groundwater samples collected at the adjacent Port of Oakland site, rather than the compounds detected in NAC effluent samples. The Port of Oakland samples did contain HVOCs, as well as metals above the MCLs, although the NAC effluent samples did not. The letter indicated that the presence of these compounds and metals in samples collected adjacent to the NAC site was the reason for their inclusion in the investigation of the Gray Water area. Accordingly, EMCON recommends submitting samples from the Gray Water area for the following analyses:

- Total oil and grease and total petroleum hydrocarbons (high-boiling-pint hydrocarbons) by U.S. Environmental Protection Agency (USEPA) method 8015/3550 modified, to include motor oil, kerosene, and jet fuel range
- Semivolatile organic compounds by USEPA method 8270
- Benzene, toluene, ethylbenzene, and xylenes (BTEX) by USEPA method 8020 or 8240

Mr. Roger Bastien  
March 14, 1995  
Page 2

Project 2077-001.01

- HVOCs by USEPA method 8010 or 8240
- CAM 17 metals by the atomic adsorption or inductively coupled argon plasma method

In addition, EMCON recommends that the Gray Water area investigation include an evaluation of local background levels for CAM 17 metals in soil, by analyzing soil from an additional boring to be drilled at a location selected during the field investigation.

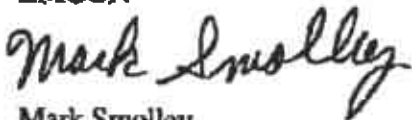
Samples collected during the investigation of the jet fuel release area will be submitted for the following analyses, as previously agreed upon:

- Total petroleum hydrocarbons as gasoline by USEPA method 8015
- Gasoline and BTEX by USEPA method 8020

Please call if you have questions.

Sincerely,

EMCON



Mark Smolley  
Project Manager

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

February 24, 1995

Alameda County CC4580  
Environmental Protection Division  
1131 Harbor Bay Parkway, Room 250  
Alameda CA 94502-6577

Mr. Roger Bastien  
National Airmotive Corporation  
7200 Lockheed Street  
Oakland, CA 94521-4504

RE: ENVIRONMENTAL INVESTIGATIONS - NATIONAL AIRMOTIVE  
CORPORATION TEST SITE, EARHART ROAD, OAKLAND AIRPORT

Dear Mr. Bastien:

I am in receipt of the February 17, 1995 EMCON letter discussing target analytes for the pending investigations at the National Airmotive Corporation (NAC) test facility. The cited EMCON letter responds to one from this agency dated February 8, 1995 sent following agency review of May 24 and August 12, 1994 EMCON work plans.

As discussed in the February 8, 1995 correspondence from this office, the June 27, 1990 Golder Associates report entitled, "Final Report, Solid Waste Assessment Test for the North Port of Oakland Refuse Disposal Site," presents data collected from soil borings, surface water samples, and ground water samples collected from completed monitoring wells. Various metals were detected in both surface and ground water from sample points located proximal to the NAC test facility, several of which were present in concentrations above their respective MCLs, including lead, mercury and selenium. The halogenated volatile organic compounds (HVOC) 1,1,1-TCA and 1,2-DCA (trans/cis) were also detected, as were several semi-volatile organic compounds (SVOC).

EMCON correctly notes the absence of HVOCs in tested effluent water (as discussed in the June 28, 1994 Jonas & Associates, Inc. [JAI] report). However, the presence of such compounds (i.e., metals, HVOC) in sampled surface and ground water adjacent to the test site warrants their inclusion in the suite of target analytes previously requested as a part of the "gray water" investigation.

Please also note that sample analyses for total oil and grease (TOG) were requested because such compounds were found in effluent water during JAI's study. Method 5520 E&F was reportedly used. The presence of this high boiling range of hydrocarbon in effluent water indicates oily discharges from the test site may have occurred. Such compounds may be present in samples even in the absence of the other high-boiling point fuel hydrocarbons.

Mr. Roger Bastien  
RE: Nat'l Airmotive Test Facility  
February 24, 1995  
Page 2 of 3

This office would agree to the use of the high boiling point hydrocarbon (HBHC) method proposed by EMCON only if the gas chromatograph (GC) program is extended into the motor oil range. Hence, the accepted analysis would utilize the GC/FID method (modified EPA Method 8015/3550) to identify peaks in the diesel, kerosene, jet fuel and motor oil ranges. (Please note that the February 8, 1995 letter from this office did not indicate Method 418.1 was the sole analytical method to be used for TOG analysis - it was one of three optional methods presented.)

EMCON has indicated substantial agreement with the target compounds associated with the jet fuel release.

Therefore, the following sample target analytes and analytical methods shall be used:

***Gray water investigation***

- o TOG, TPH (HBHC, as above)) Method 8015/3550 (modified)
- o SVOC Method 8270
- o BTEX Method 8020 or 8240
- o HVOC Method 8010 or 8240
- o CAM 17 metals AA or ICAP, as appropriate

***Jet fuel release***

- o TPH-G Method 8015/5030 (modified)
- o TPH (HBHC, as above) Method 8015/3550 (modified)
- o BTEX Method 8020 or 8240

Please contact this office when field work has been scheduled to begin. I may be reached at 510/567-6783.

Sincerely,

  
Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist



Mr. Roger Bastien  
RE: Nat'l Airmotive Test Facility  
February 24, 1995  
Page 3 of 3

cc: Rafat A. Shahid, Agency Director  
Gil Jensen, Alameda County District Attorney's Office  
Tom Peacock, ACDEH LOP  
Pamela Evans, ACDEH  
Mark Smolley, EMCON Associates, 1921 Ringwood Ave.  
San Jose, CA 95131-1721

|                                          |                  |                |
|------------------------------------------|------------------|----------------|
| Post-It™ brand fax transmittal memo 7671 |                  | # of pages ▶ 3 |
| To Patricia Murphy                       | From Scott Seery |                |
| Co. Port                                 | Co. ACDEH        |                |
| Dept.                                    | Phone # 567-6783 |                |
| Fax # 465-3755                           | Fax #            |                |

**EMCON**

1921 Ringwood Avenue - San Jose, California 95131-1721 • (408) 453-7300 • Fax (408) 437-9526

February 17, 1995  
Project 2077-001.01

SCOTT SEERY

Mr. Roger Bastien  
National Airmotive Corporation  
7200 Lockheed Street  
Oakland, California 94621-4504

Re: Response to ACHCS Request for Additional Analyses

Dear Mr. Bastien:

EMCON reviewed the letter from the Alameda County Health Care Services (ACHCS) dated February 8, 1995. The ACHCS commented on the workplans submitted by EMCON (May 24 and August 12, 1994) for assessing the soil and groundwater conditions in the underground storage tank and gray water discharge areas at the National Airmotive Corporation (NAC) facility. The ACHCS requested additional analyses be performed on soil and groundwater samples that will be collected from these areas. EMCON reviewed the requested analyses and recommends conducting the following analyses.

#### "Gray Water" Investigation Area

- High boiling point petroleum hydrocarbons (HBHC), which includes kerosene, diesel fuel, and jet fuel
- Semivolatile organic compounds (Method 8270)
- Benzene, Toluene, Ethylbenzene, and Xylene (method 8020)

#### Underground Tank Storage Area

- HBHC
- Gasoline, and Benzene, Toluene, Ethylbenzene, and Xylene (BTEX, method 8020)

The ACHCS recommended conducting other analyses that EMCON does not recommend based on the rationale described below.

#### "Gray Water" Investigation Area

- Total oil and grease (TOG) Method 418.1
- Halogenated Volatile Organic Compounds (VOCs, method 8010 or 8240)



Project 2077-001.01

Mr. Roger Bastien  
February 17, 1995  
Page 2

• CAM 17 metals

The TOG analysis is a general petroleum hydrocarbon analysis which does not identify a specific petroleum product. EMCON proposed this method in the August 12, 1994, workplan as an initial screening analysis to determine whether petroleum hydrocarbons were present. It is not necessary to analyze the samples using the TOG analyses, since the samples will be analyzed for HBHC compounds and SVOCs which will duplicate and give more information than the TOG analyses.

EMCON reviewed the March 1994 effluent results from the *Evaluation of Storm & Wastewater Management at the Engine Test Facility*, (Jonas & Associates, June 28, 1994). The effluent samples were analyzed for VOCs according to EPA method 624. The only compounds detected in this analysis were BTEX compounds. These compounds will be analyzed using method 8020. Based on the effluent results, it is not necessary to analyze the samples for VOCs other than BTEX by using EPA methods 8010 or 8240.

The effluent samples were analyzed for metals, the only metals exceeding the drinking water maximum contaminant levels (MCLs) were ~~cadmium~~ and ~~mercury~~. Cadmium was detected at 0.029 milligrams per liter (mg/l, Federal MCL is 0.005) and mercury was detected at 0.012 mg/l (State MCL is 0.002 mg/l). The water in this area is not a drinking water source and these effluent levels are only marginally above the MCLs. Based on this information, further analyses for metals does not appear to be necessary.

also: MCL  
Selenium (10)  
Pb (B) (50)  
Al (1.0)  
Cr (6) (50)  
surface/  
GLO

ACHCS requested one additional boring in the underground storage tank area directly southeast of the "high speed test cell". EMCON concurs with the ACHCS recommendation that NAC place this requested additional boring in this area.

Please call if you have questions.

Sincerely,

EMCON

Mark Smolley  
Project Manager

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

February 8, 1995

Alameda County CC4580  
Environmental Protection Division  
1131 Harbor Bay Parkway, Room 250  
Alameda CA 94502-6577

Mr. Roger Bastien  
National Airmotive Corporation  
7200 Lockheed Street  
Oakland, CA 94521-4504

RE: ENVIRONMENTAL INVESTIGATIONS - NATIONAL AIRMOTIVE  
CORPORATION TEST SITE, EARHART ROAD, OAKLAND AIRPORT

Dear Mr. Bastien:

I have completed review of the May 24 and August 12, 1994 EMCON Associates work plans for the initial assessment of environmental conditions at the referenced site. The cited work plans address the environmental issues associated with the reported 1992 surface release of approximately 1100 gallons of jet fuel near the underground storage tank (UST) complex, and the discharge of contaminated surface run-off into an adjoining, unlined culvert along the site's western border. Review was performed in context with previous environmental investigations reported by others, including, but not necessarily limited to, the following:

- o *Final Report, Solid Waste Assessment Test for the North Port of Oakland Refuse Disposal Site; Golder Associates, Inc., June 27, 1990*
- o *Evaluation of Storm & Wastewater Management at the Engine Test Facility, National Airmotive Corporation; Jonas & Associates, Inc., June 28, 1994*

The noted Golder Associates document presents the results of an assessment of the North Oakland Refuse Disposal Site (NORDS) which was performed during 1989 and 1990. This work was performed pursuant to California Water Code Section 13273 which required the submittal of a Solid Waste Assessment Test (SWAT) report to the Regional Water Quality Control Board (RWQCB) by July 1, 1990. The National Airmotive (NA) test facility adjoins, and is partially underlain by, NORDS.

The SWAT investigation (and preliminary work) included the advancement of exploratory boreholes, installation of ground water monitoring wells with subsequent sampling, and the collection of surface water samples. Two wells (MW-3 and -4), one exploratory borehole (B-2), and one surface water sample (SW-3) are located, or were collected, adjacent to the NA site. Well MW-4 and sample point SW-3 adjoin the unlined culvert which runs along the test facility's western border.

Mr. Roger Bastien  
RE: Nat'l Airmotive Test Facility  
February 8, 1995  
Page 2 of 4

A range of organic compounds were detected at elevated concentrations in both surface and ground water collected from the sample points directly adjacent to the western border of the NA test facility. The SWAT investigation concluded that the presence of such compounds, including volatile and semi-volatile organic compounds (VOC and SVOC, respectively), are the result of surface and/or subsurface infiltration from "an adjacent chemical source not associated with the [NORDS] landfill."

The noted Jonas & Associates, Inc. report presents the current storm- and wastewater practices at the test facility. Various passive and active stormwater discharge practices have been employed at the site, including, among others, runoff, percolation, discharge through drain pipes, and pumping to a "grassy area" west of the facility. Wastewater is currently routed from drains located in all but one test cell (Test Cell 2) through a series of two oil/water separators via both below- and above-ground piping. Discharges from Test Cell 2, an uncovered facility, are presumably incorporated into stormwater run-off. Effluent water from the final separator is temporarily collected in an above-ground tank.

Chemical testing of the collected effluent was performed during March 1994. Analyses for total petroleum hydrocarbons as diesel, kerosene, and motor oil (TPH-D, -K, and -MO, respectively), VOC, SVOC, total oil and grease (TOG), and CAM 17 metals, were performed. Elevated concentrations of each target suite were reported. The current, or past, means of effluent discharge or disposal are unknown.

During my November 17, 1994 tour of the NA test facility I was informed that effluent from the first oil/water separator had been diverted in the past to the surface drainage leading directly to the unlined culvert located along the western border of the test facility. It is reasonable to anticipate that this discharge contained comparable concentrations of those compounds identified during the March 1994 effluent analyses. Such discharges may explain the presence of similar, if not identical, compounds discovered in both surface and ground water sampled during the SWAT investigation from those points in close proximity to the test facility's western border.

In light of the foregoing discussion, the EMCON Associates work plan addressing the "gray water" discharge must be modified in scope to reflect the additional analytes which should be sought.

Mr. Roger Bastien  
RE: Nat'l Airmotive Test Facility  
February 8, 1995  
Page 3 of 4

As ground water sampled from SWAT well MW-4 has already shown impact, permanent well points located down gradient of this source area must eventually be constructed to appropriately track the extent of ground water pollution. An appropriate number of permanent well points will also eventually be required with respect to the jet fuel release investigation.

However, to facilitate the *initial* phases of the investigations, the EMCON Associates work plans have been accepted with the following changes:

- 1) Soil and ground water samples collected during the initial phase of the "gray water" investigation are to be analyzed for:
  - o TOG (Methods 5520 D&F or 418.1 or GC/FID)
  - o TPH-D, TPH-K (GC/FID)
  - o SVOC (Method 8270)
  - o BTEX (Method 8020 or 8240)
  - o Halogenated VOC (Method 8010 or 8240)
  - o CAM 17 metals
- 2) Several proposed "gray water" sampling points do not correctly reflect the locations of those samples collected previously by this agency. Therefore, field work should be scheduled with this office so that a representative may be available on-site to assist the sampling crew with sample point locations.
- 3) Soil and ground water samples collected during the initial phase of the jet fuel release investigation are to be analyzed for:
  - o TPH-G and TPH-D (GC/FID)
  - o BTEX (Method 8020 or 8240)
- 4) An additional boring should be advanced, and soil and water samples collected, directly southeast of the "high speed test cell," as depicted on Figure 2 of the May 24, 1994 EMCON Associates work plan.

Mr. Roger Bastien  
RE: Nat'l Airmotive Test Facility  
February 8, 1995  
Page 4 of 4

As these projects progress during subsequent phases of work at the site, NA should gain access to wells MW-3 and -4, constructed during the SWAT investigation, for the collection of ground water samples. Such would eliminate redundant well placement and maximize the use of viable hardware already in place. Additionally, all future reports and work plans are to be submitted under seal of a California-registered geologist or civil engineer.

Please contact this office when field work has been scheduled to begin. I may be reached at 510/567-6783.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director  
Gil Jensen, Alameda County District Attorney's Office  
Tom Peacock, ACDEH LOP  
Pamela Evans, ACDEH  
Mark Smolley, EMCON Associates, 1921 Ringwood Ave.  
San Jose, CA 95131-1721



January 16, 1995

Scott O. Seery CHMM  
Alameda County Department of Environmental Health  
Environmental Protection Division  
1131 Harbor Bay Parkway, #250  
Alameda, CA 94502-6577

Re: National Airmotive Corporation Earhart Road, Oakland Airport.

Dear Mr. Seery:

Per your conversation on January 11, 1995, with our counsel, William D. Connell, of Gibson, Dunn & Crutcher, enclosed herewith please find a check, made payable to "Alameda County," in the amount of \$2,500, as a deposit for the work to be performed by your office in connection with the projects we discussed on November 17, 1994 at the National Airmotive Corporation Test Cell Facility, Earhart Road, Oakland Airport. Mr Connell will be providing a letter to Mr. Jensen under separate cover to memorialize this existing understanding regarding this sum, but National Airmotive Corporation wanted to get the deposit to you without further delay so work may commence. I will be in touch with you shortly.

Best Regards,

A handwritten signature in dark ink, appearing to read "R. Bastien", is written over a large, light-colored circular stamp or watermark.

Roger L. Bastien  
Manager  
Facilities & Environmental

cc: Gilbert A. Jensen Esq. (without enclosure)  
William D. Connell, Esq. (without enclosure)



1995, 01-10 12:42  
 510 337 9335  
 ALAMEDA CO EHS HAZ-OPS

| COM No. | REMOTE STATION | START TIME  | DURATION | PAGES | RESULT | USER ID | REMARKS |
|---------|----------------|-------------|----------|-------|--------|---------|---------|
| 236     | 4159865309     | 01-10 12:42 | 00' 47   | 02/02 | OK     |         |         |

7499402046

Post-It™ brand fax transmittal memo 7671 # of pages ▶ 2

|       |                 |         |              |
|-------|-----------------|---------|--------------|
| To    | WILLIAM CONWELL | From    | SCOTT SEERY  |
| Co.   |                 | Co.     | ALDEH        |
| Dept. |                 | Phone # | 510-567-6783 |
| Fax # | 415/986-5309    | Fax #   |              |

ALAMEDA COUNTY  
 HEALTH CARE SERVICES



AGENCY  
 DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

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

January 6, 1995

Mr. Roger Bastien  
 National Airmotive Corporation  
 7200 Lockheed Street  
 Oakland, CA 94521-4504

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|       |                 |         |              |
|-------|-----------------|---------|--------------|
| To    | WILLIAM CONWELL | From    | SCOTT SEERY  |
| Co.   |                 | Co.     | ALDEH        |
| Dept. |                 | Phone # | 510-567-6783 |
| Fax # | 415/986-5309    | Fax #   |              |

RE: ENVIRONMENTAL INVESTIGATIONS - NATIONAL AIRMOTIVE  
 CORPORATION TEST SITE, EARHART ROAD, OAKLAND AIRPORT

Dear Mr. Bastien:

At the conclusion of our November 17, 1994 meeting and tour of the National Airmotive Corporation (NAC) facilities, I advised you that an initial deposit of \$2500 must be remitted before this agency may begin review of the May 24 and August 12, 1994 EMCON Associates environmental assessment workplans and continue with oversight of the projects. You informed me that it was NAC's belief that the terms of the October 21, 1994 judgement with Alameda County included such agency oversight costs.

Mr. Gil Jensen of the Alameda County District Attorney's Office advised me before and since our November 17 meeting that, while the judgement recited significant portions of the final payments as "costs," this was done at the specific request of NAC's lawyers for the purpose of securing favorable tax and other benefits for the company. Please be aware that those sums were not paid to an account which would fund this agency's oversight of the pending environmental investigations.

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

January 6, 1995

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

Mr. Roger Bastien  
National Airmotive Corporation  
7200 Lockheed Street  
Oakland, CA 94521-4504

RE: ENVIRONMENTAL INVESTIGATIONS - NATIONAL AIRMOTIVE  
CORPORATION TEST SITE, EARHART ROAD, OAKLAND AIRPORT

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Mr. Gil Jensen of the Alameda County District Attorney's Office advised me before and since our November 17 meeting that, while the judgement recited significant portions of the final payments as "costs," this was done at the specific request of NAC's lawyers for the purpose of securing favorable tax and other benefits for the company. Please be aware that those sums were not paid to an account which would fund this agency's oversight of the pending environmental investigations.

Specific costs incurred by this agency during oversight of environmental investigations are funded directly by the responsible party, or, in the case of an underground storage tank investigation overseen by the county's Local Oversight Program (LOP), through direct, contracted reimbursement from the State Water Resources Control Board. Hence, without funding specific to the pending projects at the subject site, this agency will not provide the requisite oversight.

Please be reminded that the final judgement stipulates that NAC is entitled to a credit of up to \$125,000 for certain costs associated with the pending investigations. Agency oversight is amongst those costs for which credit will be applied.

Mr. Roger Bastien  
RE: 7200 Lockheed Street  
January 6, 1995  
Page 2 of 2

Please encourage your attorneys to contact Mr. Jensen should this matter remain an issue with NAC. Mr. Jensen's telephone number is 510/569-9281.

I may be reached at 510/567-6783 should you have any additional questions.

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director  
Gil Jensen, Alameda County District Attorney's Office  
Tom Peacock, ACDEH LOP



Alameda County  
District Attorney's Office  
John J. Meehan, District Attorney

November 1, 1994

Wei Wei Chui  
Unit Chief  
Region 2  
Cal-EPA Department of Toxics  
Substances Control  
700 Heinz Avenue, Bldg F 2nd Floor  
Berkeley, CA 94710

Re: People v National Airmotive Corporation

Dear Ms. Chui:


Enclosed are a check made payable to the Hazardous Substance Account as payment of penalties pursuant to clause 5 H 1 of the additionally enclosed Judgment. Thank you for your cooperation in the above case.

Please take steps to comply with clause 5 E of the Judgment, by coordinating with Mr. Scott Seery, and Ms. Pam Evans, Sr. Hazardous Materials Specialists with the Alameda County Environmental Health Department. Mr Seery and Ms. Evans are assigned to oversight of the entire case and should be informed of your agency's actions until compliance is achieved.

Very truly yours,

JOHN J. MEEHAN  
District Attorney

By

  
Gilbert A. Jensen  
Sr. Deputy District Attorney

JJM GAJ:gj  
cc: Scott Seery, Alco Hazmat  
Pam Evans, Alco Hazmat  
Michael Pixton, Dept of Toxics  
Enclosures

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

HAZARDOUS MATERIALS RELEASE AND NOTIFICATION REPORT (H&SC 25180.7)  
 EMERGENCY RESPONSE

1 INFORMATION RECEIVED BY: 10:45 AM Kevin Tinsley 8/25/94  
DATE: 8/24/94 TIME: 9:40 pm

2 INCIDENT LOCATION: 7200 Lockheed St  
CITY: Oakland ZIP: 94621

3 DATE OF INCIDENT: 8/24/94 TIME OF INCIDENT: 9:40 pm  
4 REPORTED BY: Roger Bastien AGENCY: National Automotive Corp  
ADDRESS: 7200 Lockheed St CITY, ZIP: Oakland, Ca. 94621  
TELEPHONE: (510) 613-1012 CONTACT: Roger Bastien  
PHONE: 613-1012

5 TYPE OF DISCHARGE:  
 Discharge from vehicle License Plate No. CA0607 # ID  
Manifest/Shipping Information: hydrolic oil  
 Abandoned Material  fixed facility  
Name: \_\_\_\_\_ Address: \_\_\_\_\_  
City: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
 Other (specify) \_\_\_\_\_

6 ESTIMATED QUANTITY DISCHARGED: 30 gallons  
QUANTITY THREATENED TO BE RELEASED: entire contents of system

7 NATURE OF MATERIAL:  
 Solid  Liquid  Gas  Powder  Granular  
 Radioactive  Other  
Chemical Name: hydrolic oil Common Name: \_\_\_\_\_

8 HAZARDOUS PROPERTIES:  Corrosive  Ignitable  TOXIC  
 Reactive  Other Combustible

9 HAZARDOUS MATERIAL WAS RELEASED TO:  
 Air  Storm Drain  San Francisco Bay  Sanitary Sewer  
 Other Natural Waterway (creek, lake, reservoir)  Groundwater  
 Groundsurface (soil, road, etc.)  Other (specify) \_\_\_\_\_  
approx. 1 pint entered clarifier on site (standing water inside the clarifier)

10 WEATHER CONDITIONS: clear / dry

11 NUMBER OF INJURED PERSONS REQUIRING HOSPITALIZATION: 0  
Names and Addresses of Hospitals Utilized: \_\_\_\_\_

12 PERSONS PRESENT AT SCENE:

Name: Winston Escoffery Affiliation: Sup. on 2nd Shift Phone: 613-1000

13 RESPONSIBLE PARTY: Waste Management

Name: \_\_\_\_\_ Phone: \_\_\_\_\_  
Address: \_\_\_\_\_

14 EVIDENCE COLLECTED (samples, photographs, etc.)

photographs this morning

15 CLEAN-UP ACTIONS: nothing app used absorbant material Waste Mg took it with them.

Names and Addresses of Persons Doing Clean-up:

Waste Management lead clean up activities

Description of Clean-up Actions:

See above

16 TIME INCIDENT CLOSED: finished 10:21 Am

17 ELAPSED TIME: 21 minutes

18 [ ] DISCHARGE NOT TO BE NOTIFIED:  
\_\_\_ Unlikely to Cause Substantial Injury to Public Health & Safety  
\_\_\_ Public Knowledge \_\_\_ Ongoing Criminal Investigations  
\_\_\_ Permitted Discharge \_\_\_ Other

19 [ ] DISCHARGE TO BE NOTIFIED:  
Factors Determining That This Hazardous Waste Discharge Or  
Potential Discharge Is Likely To Cause Substantial Injury To The  
Public Health Or Safety:

- 20 NOTIFICATION:  
\_\_\_ Board of Supervisors  
\_\_\_ Health Officer  
\_\_\_ Alameda County Press Room  
\_\_\_ Reporting Agency or Individual

By copy of this report to the above listed agencies and officials, we are hereby submitting this information on behalf of all designated employees of the Department of Environmental Health, according to Section 25180.7, Health & Safety Code. The information submitted in this report is based upon the best available information at the time the report was completed.

Inspector's Name: Don Hwang Date: \_\_\_\_\_  
Inspector's Signature: \_\_\_\_\_

MEMORANDUM

DATE: August 1, 1994

TO: file

FROM: Don Hwang

SUBJ: National Automotive Corp., 7200 Lockheed St., Oakland  
94621; Sampling on May 12, 1994

---

Sampling done by me was at the request of John Samuelson, Alameda County District Attorney's Office.

JUN 17, 1994 5:28AM #098 P.01  
TO: DIST. ATTORNEYS OFFICE  
FROM: OMNIFAX

# Fax Transmittal Sheet

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

Date: June 17 1994 Number of Pages Including Cover 11

Deliver To: \_\_\_\_\_ From: \_\_\_\_\_  
Name: John Samuelson Name: Michael Pixton  
Phone: 569 9281 Phone: 540 3862

Comments: I will mail you a copy of the complete  
report with a cover letter referring the case to the  
Att's office for enforcement.

This fax came from Region 2 Office Fax #(510) 540-3819. If you have any problem with this transmission, or if you have not received all of the pages, please call (510) 540-3724.



**DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
INSPECTION REPORT**REGION 2  
730 HEINZ AVE., SUITE 200  
BERKELEY, CA 94710-2737

National Airmotive Corporation  
7200 Lockheed Street  
Oakland Airport - North Field, Bldg L815  
Oakland, California 94614

EPA ID No. CAD 080 709 587

Date of Inspection: May 19, 1994  
Date of Report: June 17, 1994

**I. Purpose:**

To conduct a tiered permitting non-notifier and complaint (#02-034-0110) inspection.

**II. Representatives Present:**

National Airmotive Corporation (NAC):  
Cliff E. Maupin - Supervisor, Maintenance  
Roger Bastien - Manager, Facilities and Environmental  
Robert Connell - Attorney for NAC  
Steve Lieba - Lead Cleaner

California/Environmental Protection Agency, Department of  
Toxic Substances Control (Department):  
Michael Pixton - Associate Hazardous Materials Specialist

**III. Owner/Operator:**

NAC is owned and operated by Mr. A.E. Morjig. Mr. Roger Bastien is the manager with direct daily responsibility for the management of hazardous waste at the facility.

**IV. Background:**

NAC was inspected by the Department (then the Department of Health Services, Toxic Substances Control Division) on May 19, 1987 in response to a complaint alleging illegal disposal of waste oil. During the inspection the only violation cited was lack of labeling on some of the hazardous waste drums. A Hazardous Waste Management Report was issued to NAC on May 19, 1987 giving NAC 10 days to come into compliance. On July 21, 1987 NAC provide photographic documentation that the drums had been labeled.



National Airmotive Corporation  
Inspection Report  
May 19, 1994

On February 18, 1994 two letters were forwarded to the Department from William W. Carter, California Environmental Protection Agency, which alleged that NAC was illegally disposing of its hazardous waste (Attachment III). This information was also forwarded to the Air Resources Board, Alameda County Health Department, Alameda District Attorney, Department of Fish and Game (DFG), and the Regional Water Quality Control Board. After the preliminary discussions and organization it was decided that the Department would conduct a non-notifier inspection after DFG had completed its initial investigation.

V. Description of the Facility:

NAC is comprised of two non-contiguous areas (Attachment II). One is the main complex of buildings and the other is a single building used to test the rebuilt turbine engines. NAC is in the business of repairing and overhauling turbine engines. This operation includes metal finishing and degreasing activities. The 1987 business plan (most recent one on file) listed 380 employees and 250,000 square feet of operations area.

NAC maintains a hazardous waste and hazardous materials storage area outside of the main building. NAC also uses several sumps to collect run-off at the main building and at the test cell building.

VI. Hazardous Waste Activities:

The exact types and volumes of hazardous waste that are generated, treated, and/or disposed of by NAC are uncertain at this time. Based upon NAC's written statements, in its business plan and sewer discharge permit application, NAC generates waste oil, waste solvent, waste alkaline cleaning solution, and metal sludge. Review of the Department's database (Haznet) of manifests showed that NAC has taken as much as 531 days between shipments of unspecified solvent waste stream.

VII. Observations:

Prior to leaving for the facility I obtained a GasTech Combustible Gas Indicator (CGI) (model number 1314, serial #F2749) and checked its calibration with a 40% lower

National Airmotive Corporation  
Inspection Report  
May 19, 1994

explosive limit (LEL) of hexane in air (lot #6932, serial #930818-23). The CGI gave a response reading of 45%, at 8:15 A.M., to this calibration test.

At approximately 9:10 A.M. I arrived at NAC to begin the inspection. Mr. Bastien was unavailable at that time and Mr. Maupin was summoned to assist me with the inspection. I explained to Mr. Maupin that I was present to follow-up on complaint #02-034-0110 (Attachment III) and to determine if the Department's tiered permitting program applied to this facility. Mr. Maupin gave his consent for me to conduct the inspection and began by escorting me to the Allison Electrolytic Plating (AEP) operation.

Upon entering the AEP operation room I turned on the CGI and obtained a reading of 10% LEL after equilibration. No one was in the operations room at this time and all of the operating equipment was closed and ventilated to pollution control devices. Mr. Maupin explained that the equipment pieces are inserted into the tanks for deposition and then suspended over the tank for drainage. After the part is done draining it is carried, on a cart, to the next room for rinsing.

*Sludge*

I observed a containment area under the tanks and Mr. Maupin explained that this containment area was used to collect all drippage, leaks, and spills. All such releases are placed into hazardous waste drums and sent off-site for disposal as hazardous waste. Mr. Maupin also stated that the tanks have the cleaned out approximately once or twice a year, but he was unsure of the exact number of times it was done annually. There were two doors in this room, one to the outside and the other door to the rinsing room. There was one 55-gallon drum of product nitromethane and one 55-gallon drum of product isopropyl alcohol stored in this room for use in the AEP system.

In the rinse room was a bead blaster for cleaning the parts, two nitric acid/sulfuric acid stripping baths, and a rinse tank. There was a common containment area under the rinse tank and the stripping baths. According to Mr. Maupin, the containment area is emptied and cleaned when it reaches its capacity. There was an unlabeled 55-gallon drum of unknown liquid sitting next to one of the stripping baths. Mr. Maupin summoned the technician working in this area to identify the drum contents.

National Airmotive Corporation  
 Inspection Report  
 May 19, 1994

The technician stated that the drum held waste acid from the stripping ~~process~~ and that the last time waste was added to it was last Wednesday. At Mr. Maupin's direction the technician immediately went to put a hazardous waste label on the drum while Mr. Maupin led me to the boil-off tanks. At the tanks Mr. Maupin explained that the rinsewaters and wastewaters from the operations were 98% water and were pumped directly from the operations to a holding tank and then to one of six open-topped boil-off tanks. At the boil-off tanks the waste is boiled down to a thick sludge. The ~~vapors~~ from the boiling are emitted directly to the atmosphere and the sludge is periodically removed from the tanks and sent off-site as hazardous waste. Mr. Maupin stated that the sludge from the boil-off tanks was cleaned out once every nine months. The boil-off tanks are separate entities from the boiler which is used to produce steam at the facility.

Mr. Maupin asked me not to take any photographs until I had spoken with Mr. Bastien. Mr. Maupin then led me to Mr. Bastien's office where I was introduced to Mr. Bastien and Mr. Robert Connell. Mr. Bastien later explained that Mr. Connell was an attorney hired to represent NAC and that he happened to be present at this time. Mr. Maupin left to have his breakfast while Mr. Bastien and Mr. Connell continued the inspection with me. While in Mr. Bastien's office I asked if NAC had any analysis of the wastes being treated in the boil-off tanks. Mr. Bastien provided me with a copy of the Polymatrix Associates analysis of the ~~samples~~ taken from ~~the tanks~~ and ~~side sewer #3~~. Mr. Bastien later clarified that ~~the tanks~~ feeds directly to the holding tank for the boil-off tanks and side sewer #3 went to the sewer district.

The analysis of the rinse ~~water~~ showed a pH of 9.8, all metals below 1 mg/l and a volatile organics analysis with all contaminants in the parts per billion range. The sample was a composite composed of 70 ml grabs every 15 minutes over a 24 hour time period collected from side sewer #1. I asked Mr. Bastien what types of hazardous waste NAC usually generated and he identified the ~~solvents~~, waste acids, and ~~other~~.

Mr. Bastien and Mr. Connell then began to escort me through the rest of the facility. At the large engine cleaning area Mr. Bastien stated that there were at least nine solvent ~~booths~~ at the facility. The booths are set-up so that clean solvent is pumped directly from the drum to the

"boil-off"  
 tanks  
 (2) sludge  
 (3) vapor emission

"side sewers"  
 #1 and #3

waste  
 streams

National Airmotive Corporation  
Inspection Report  
May 19, 1994

spray wand and the spent solvent is then collected in another 55-gallon drum or collection basin. The spent solvent is labeled and sent to Romic Chemical Company for recycling or incineration.

At another section of the building the parts are cleaned in a soapy water tank, rinsed in a [REDACTED], rinsed again in an air agitator and then taken to have a special penetrant applied to them. The [REDACTED] from the cleaning are currently discharged to the sewer district by side [REDACTED]. According to Mr. Bastien, by June of this year side sewer #3 will be converted to feed directly to the holding tank for the boil-off tanks.

The [REDACTED] is a special chemical which is used with a fluorescent light to identify hairline cracks in the parts. The penetrant is sprayed directly onto the cleaned part and then viewed under a fluorescent lamp. After viewing the penetrant is rinsed off of the part with a spray hose. The penetrant is currently discharged directly to [REDACTED]. When I asked to take a photograph of this area Mr. Bastien was hesitant to give me authorization. Mr. Bastien explained that there was nothing confidential or trade secret, but that NAC had a strong policy on not allowing any photographs to be taken. Mr. Connell also insisted that I not take any photographs at this time due to the company policy. I explained the options left to me of either doing the inspection without photographs or obtaining a warrant and taking the photographs with it. Mr. Connell and Mr. Bastien agreed that I could take a photograph of the boil-off tanks and the holding tank since they were outside. I agreed to these terms in the interest of cooperating with NAC's policies.

I asked Mr. Bastien if I could view a Material Safety Data Sheet (MSDS) for the penetrant and he immediately provided me with one. I later called the manufacturer and obtained a more recent and detailed copy (Attachment IV). Based upon the information in the MSDS and the calculation from Title 22, California Code of Regulations, section 66261.24 (c) the waste penetrant may be a hazardous waste.

Mr. Bastien then led me to the end of the building and showed me another of the solvent spray booths. This booth was using [REDACTED], [REDACTED] Type II solvent. The waste solvent collection drum had a product label on it. Mr. Bastien explained that since it was in a satellite accumulation area it did not need labeling. According to

National Airmotive Corporation  
Inspection Report  
May 19, 1994

Mr. Bastien, NAC would label the drum when it was moved to the 90-day accumulation area. I explained to Mr. Bastien that even containers in satellite accumulation areas had to have hazardous waste labeling on them. Mr. Bastien stated that this problem would be found at all of the booths like this and that NAC would correct the problem.

In the shop area where aviation turbines are disassembled and reassembled we viewed another spray booth. There was a 5-gallon can of Exxon Turbo Oil 2380 with a funnel in its open bung sitting under the booth. I asked if this can held product or waste oil. Mr. Joe Lindly, Supervisor was summoned and Mr. Lindly stated that he did not know if it was product or waste. A technician was then summoned and he identified the contents as a waste. According to the technician this type of oil had a very strict tolerance of contaminants and since it had been left open for some time it was now a waste.

Mr. Bastien and Mr. Connell then led me to the 90-day accumulation area. As we walked out to it I observed a bin with 5-gallon cans in it. I explained to Mr. Bastien and Mr. Connell the State regulations on the disposal of contaminated containers. The containers that I observed proved to be empty at this time.

At the 90-day accumulation area NAC stores both hazardous waste and hazardous materials. In the corrosives bay were five 55-gallon drums of a waste nitric/sulfuric acid mixture. Three of the five did not have an accumulation start date listed on them and a fourth label was so faded from exposure (accumulation start date February 24, 1994) that it was almost illegible. This was the oldest drum that I observed.

In the next bay over was a roll-off oil bin. This bin was labeled "Waste Oil Only" and all of the [redacted] generated on-site is deposited here. Mr. Bastien considered this bin to be a satellite accumulation area. I explained to Mr. Bastien that this did not qualify for satellite accumulation and that this tank needed to be labeled properly. Mr. Bastien explained that the oil was sent to a recycler on a bill of lading and that he had not considered it a hazardous waste before.

In the same large bay as the waste oil bin were numerous 55-gallon drums. One drum held [redacted] waste paint chips and the label lacked the hazardous property. Another drum was



National Airmotive Corporation  
Inspection Report  
May 19, 1994

unlabeled and held used absorbent socks. Mr. Bastien did not know what they were contaminated with and summoned Mr. Steve Lieba, lead cleaner to find out. While we waited for Mr. Lieba's arrival I observed another 55-gallon drum which was labeled as hazardous waste and the composition was listed as "nonRCRA hazardous waste solid", it lacked a hazardous property, and had an accumulation start date of 4/19/94. I also observed an open 5-gallon bucket of sweet smelling dark liquid with a measured pH of 11 (I tested it), two 55-gallon drums of spent penetrant labeled as "waiting for characterization", and 23 55-gallon drums of used solvent that had no hazardous waste labeling only the date they were removed from the spray booths (April, 1994) and the product labels.

When Mr. Lieba arrived he identified the used absorbent socks as being contaminated with waste oil. According to Mr. Lieba the 55-gallon drum next to it ("nonRCRA hazardous waste solid") was generated at the same time (4/19/94) and held the same waste. Mr. Lieba explained that he had not yet finished labeling this particular drum. Mr. Lieba identified the 5-gallon bucket of sweet-smelling dark liquid as containing a detergent compound for steam cleaning (product).

Mr. Lieba then accompanied us to the large engine cleaning area to explain the process and waste management activities. As we entered the room Mr. Lieba pointed out a spray booth which used a collection basin under the booth for the used solvent. The used solvent was then pumped into a 55-gallon drum when the basin was full. The next tank was a methylene chloride and phenol mixture used to strip paint from the parts. The parts are dipped into the tank and then held over the tank until they are drained. Next they are dipped in a rinse tank. According to Mr. Lieba the tank bottom of the stripper tank is dragged clean once each year and the rinsewaters are sent to the boil-off tanks twice a year.

The next tanks in the line were alkaline cleaner dip tanks. The parts are rinsed over the tank after dipping and then given a second rinse in a rinse tank. The sludge from the alkaline cleaner tank is drummed as hazardous waste and the rinse water is sent to the boil-off tanks once each month. The tank at the end of the room is a potassium permanganate descaler dip tank. The parts are rinsed over the tank after dipping and then given a second rinse in the alkaline cleaner rinse tank. The permanganate tank is never emptied, fresh chemicals and water are added periodically.

National Airmotive Corporation  
Inspection Report  
May 19, 1994

Next to the permanganate tank is a ~~peroxide tank~~. According to Mr. Lieba, the wastewater from this tank is pH 10-11 and is sent to the boil-off tanks when needed. Next to this tank is sulfuric acid J19 descaler tank. This tank is managed in the same fashion as the permanganate tank. Next to that is the ~~final rinse~~ tank for all of the work done in this room. The ~~wastewater~~ from this tank are also emptied to the ~~boil-off tanks~~ when needed.

The last tank in this room was a ~~boil-off~~ cleaning tank. According to the MSDS for this detergent (Attachment V), the active ingredient is sodium metasilicate (silicic acid, disodium salt) and it may be hazardous to the environment in its spent form. All of the tanks in this room have a common secondary containment sump under them which is cleaned out once every two to three weeks. According to Mr. Bastien, there are ~~two large clarifiers~~ under this area which are plumbed for direct discharge to the holding tank for the boil-off tanks. All of the wastes from this building would flow to these clarifiers before being pumped to the boil-off tanks.

VIII. Violations:

1. On or about May 19 1994, NAC violated Title 22, California Code of Regulations (Cal. Code Regs.), section 66262.11 in that NAC failed to make an accurate hazardous waste determination with respect to those wastes which NAC treats on-site in its boil-off tanks. NAC has historically relied upon laboratory analysis of composite samples after dilution and has not made an assessment of the potential hazardous waste at its point of generation. NAC has also failed to do a hazardous waste determination on its waste penetrant which is discharged to the sewer district.

Evidence: Section VII, pages 3-5 & 7-8  
Witness: Michael Pixton

2. On or about May 19, 1994, NAC violated Title 22, Cal. Code Regs., section 66262.34 (f) in that NAC failed to label the following hazardous waste containers in accordance with the regulations:
  - A. one 55-gallon drum of waste nitric and sulfuric acids in the AEP rinse room had no labeling at all on it.



National Airmotive Corporation  
Inspection Report  
May 19, 1994

- B. nine 55-gallon drums of waste solvent, used at individual spray booths, lacked any hazardous waste labeling and were used to collect hazardous waste solvent at the point of generation.
- C. one 5-gallon can of waste oil (Exxon Turbo Oil 2380) had no hazardous waste labeling on it.
- D. three 55-gallon drums of waste nitric and sulfuric acid, stored in the 90-day accumulation area, had no accumulation start date listed on them.
- E. one waste oil storage bin had only the name of the contents (composition) stenciled on the side, but no other hazardous waste labeling.
- F. one 55-gallon drum of hazardous waste paint chips lacked a hazardous property.
- G. one 55-gallon drum of used oil soaked absorbent socks had no hazardous waste labeling.
- H. one 55-gallon drum of used oil soaked absorbent socks had no composition listed, only the words "nonRCRA hazardous waste solid".
- I. twenty-three 55-gallon drums of waste solvent had no hazardous waste labeling on them.

Evidence: Section VII, pages 3-7  
Witness: Michael Pixton

IX. Sampling Summary:

No samples were collected at this time.

X. Discussions with Management:

At the end of the inspection Mr. Bastien and I sat down to discuss my findings during the inspection. I explained to Mr. Bastien that my inspection had been focused on the issue of what types of hazardous waste NAC generated, how those wastes were managed, and did the Department's tiered permitting program apply to this facility. I pointed out to Mr. Bastien some of the other elements that NAC could expect to be inspected against in the future if the Department should return and do a full generator inspection.


I emphasized to Mr. Bastien the need for NAC to sample its hazardous waste streams at the point of generation and to make a determination at that time. I also described to Mr. Bastien the requirements that would fall on NAC if any of the waste streams that NAC treats should show to be a

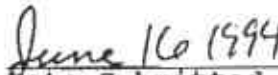
National Airmotive Corporation  
Inspection Report  
May 19, 1994

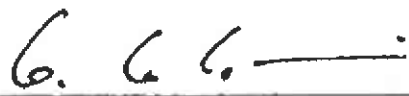
hazardous waste. Mr. Bastien agreed to collect samples from each of the waste streams and make the needed determination. Mr. Bastien also stated that NAC personnel knew better than that have the drums of hazardous waste, located at the 90-day accumulation area, unlabeled. Mr. Bastien committed to having the labeling problems corrected immediately.

XI. Attachments:

- I. Photographs - 1 page
- II. Maps of facility and flow diagram for work done - 5 pages
- III. Complaint #02-034-0110 - 7 pages
- IV. MSDS for penetrant - 3 pages
- V. MSDS for detergent cleaner - 4 pages

  
\_\_\_\_\_  
Michael Pixton  
Associate Hazardous Materials  
Specialist

  
\_\_\_\_\_  
Date Submitted

  
\_\_\_\_\_  
Wei Wei Chui  
Unit Chief

  
\_\_\_\_\_  
Date Approved

white - lab  
 yellow - insp. file  
 pink - fac. file

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY  
 DIVISION OF HAZARDOUS MATERIALS  
 80 SWAN WAY, ROOM 200  
 OAKLAND, CA 94621  
 (415) 271-4320

Lab 94-049

LABORATORY SERVICE REQUEST

SITENAME NATIONAL AUTOMOTIVE

SEND ANALYTICAL REPORT TO ABOVE OR: \_\_\_\_\_

ADDRESS 7200 LOCKHEED ST., OAKLAND 94621

SAMPLE SUBMITTED TO: ALAMEDA COUNTY ENV. HEALTH LAB.

DATE SUBMITTED 5/17/94

ATTN: DON HUANG

SEND INVOICE TO: \_\_\_\_\_

\_\_\_\_ RUSH = ABOUT 1 WEEK TURNAROUND  
 \_\_\_\_ ROUTINE = ABOUT 2 WEEKS TURN-AROUND

| SAMPLE NO. | DATE/TIME COLLECTED | TYPE OF MATERIAL (WATER, SOIL OR MATRIX) | VOLUME/WEIGHT | FIELD OBSERVATION                   | ANALYSIS REQUESTED            |
|------------|---------------------|------------------------------------------|---------------|-------------------------------------|-------------------------------|
| 940512DH-1 | 5/12/94 1140        | SOIL                                     | 2g            | BLACK STAIN<br>BLUE SPECKS          | HOLD                          |
| 940512DH-2 | 5/12/94             | SOIL                                     | 50g           | BLACK STAIN                         | OIL + GREASE                  |
| 940512DH-3 | 5/12/94             | VEGETATION                               | 10g           | BLACK STAIN                         | OIL + GREASE                  |
| 940512DH-4 | 5/12/94 1230        | SOIL                                     | 10g           | BLUE COATING                        | HEAVY METALS <sup>24</sup> AT |
| 940512DH-5 | 5/12/94             | VEGETATION                               | 5g            | BLACK STAIN                         | HOLD                          |
| 940512DH-6 | 5/12/94             | VEGETATION                               | 5g            | BLACK STAIN                         | HOLD                          |
| 940512DH-7 | 5/12/94             | SOIL                                     | 20g           | BLACK STAIN<br>BLUE + YELLOW SPECKS | OIL + GREASE                  |
| 940512DH-8 | 5/12/94 130         | VEGETATION<br>SOIL WATER                 | 150 ml        | SEWAGE SMELL<br>BLACK STAIN         | OIL + GREASE                  |
| 940512DH-9 | 5/12/94 150         | VEGETATION,<br>SOIL                      | 250g          | MUSTY SMELL<br>BLACK STAIN          | OIL + GREASE                  |

Chain of Custody:

|    |                                  |                                       |                                      |
|----|----------------------------------|---------------------------------------|--------------------------------------|
| 1. | <u>Don Huang</u><br>Signature    | <u>HAZARDOUS MATERIALS A</u><br>Title | <u>SPECIALIST</u><br>Inclusive Dates |
| 2. | <u>Dorothy Jony</u><br>Signature | <u>Supv. Chemist</u><br>Title         | <u>5/17/94</u><br>Inclusive Dates    |
| 3. | _____<br>Signature               | _____<br>Title                        | _____<br>Inclusive Dates             |