

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SCWT
6-1-05

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 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 -\$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,

A handwritten signature in black ink, appearing to read 'Ariu Levi', is written over a faint, larger signature.

Ariu Levi
Division Chief

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
8-20-04

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



6701 EARHART RD.
OAKLAND, CA

RO# 2606

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

Bernadine Palka
RE: 2633 Telegraph Avenue, Oakland CA
January 30, 1996
Page 2 of 3

- Groundwater pumping and free product recovery for control of the dissolved-phase plume and for removal of free product in monitoring well MW-3. Groundwater pumping will be initiated to lower the water table, to enhance aerobic biodegradation of hydrocarbons, to control the dissolve-phase plume, and to enhance free product recovery in the vicinity of monitoring well MW-3. The number of recovery wells required to control the dissolved-phase plume is to be determined from a pump test which will be conducted on site. Currently, GTI anticipates that a recovery well will be installed at the location of monitoring well MW-3. The pumped fluids will be piped to an oil-water separator where the free product will be separated and piped to a recovery tank. The groundwater will be pumped to a low-profile air stripper and the treated groundwater will be discharged to the public owned treatment works (POTW) or to the storm sewer system under permit.

In the "Off-Site Soil Assessment Report" dated March 27, 1995, GTI recommended the installation of monitoring wells at the locations of soil probe points SB-5 and SB-6. Since these were only temporary wells, GTI proposes to install 2-inch-diameter wells in these locations to monitor the performance of the remediation system and to define the lateral extent of petroleum hydrocarbons. Since monitoring wells MW-7 and MW-8 already define the lateral extent of petroleum hydrocarbons in the southwestern portion of the site, **a monitoring well located in the vicinity of SB-6 is probably not required.** However, a monitoring well located in the vicinity of SB-5 could be used to monitor any contamination present down gradient of the proposed vapor extraction well, which is to be installed in the vicinity of boring B-2. This monitoring well could also be used to determine the zone of influence for this proposed vapor extraction well.

Additional assessments include the biotreatability test, the soil vapor extraction test and the groundwater pump test. These assessments will help to determine the optimum conditions for effective implementation of the bioremediation process, the calculation of the effective radius of influence for each of the vapor extraction points, and the size and type of the water treatment system to be installed on site and to determine whether a single pumping well will be sufficient to capture the free product plume.

This Remedial Action Plan/Work Plan is approved. Please keep this office advised on progress of the work plan pertaining to this site.

Once free product has been removed, this site should be reevaluated to determine whether continued ground water pumping is warranted. The goal of this RAP is to ultimately reclassify this site as a "Low Risk Groundwater Case" as defined in the Regional Water Quality Control Board (RWQCB) "Interim Guidelines on Required Cleanup at Low Risk Fuel Sites". The preferred management strategy for "Low Risk Groundwater Cases" are passive bioremediation and continued ground water monitoring until this site qualifies for eventual case closure.

Bernadine Palka
RE: 2633 Telegraph Avenue, Oakland CA
January 30, 1996
Page 3 of 3

I have recently taken over this case file from Thomas Peacock of this office. Should you have any questions or comments, please feel free to call me directly at (510)567-6880.

Sincerely,



Dale Klettke, CHMM
Hazardous Materials Specialist

c: Mr. Michael Wray, Groundwater Technology, Inc., 4057 Port Chicago Highway,
Concord, CA 94520

Bc Gil Jensen, Alameda County District Attorneys Office
Thomas Peacock, LOP Manager--files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#2606
RAFAT A. SHAHID, DIRECTOR

March 7, 1996

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510)567-6700

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#2606

RAFAT A. SHAHID, DIRECTOR

February 21, 1996

DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

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

RE: 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



6701 EARHART RD,
OAKLAND, CA
RO# 2606

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) 567-6700

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 run-off 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 ground water are highest near the UST cluster, with a few "hot 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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO2606

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

R02606

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 94621-4504

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:

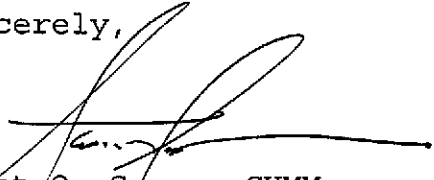
- 1) Soil and ground water samples collected during the initial phase of the "gray water" investigation are to be analyzed for:
 - o TOG (Methods 5520 D&F or 418.1 or GC/FID)
 - o TPH-D, TPH-K (GC/FID)
 - o SVOC (Method 8270)
 - o BTEX (Method 8020 or 8240)
 - o Halogenated VOC (Method 8010 or 8240)
 - 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

ALAMEDA COUNTY
HEALTH CARE SERVICE

AGENCY

DAVID J. KEARS, Agency Director



6701 Earhart Rd.

Ro# 2606

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

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.

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.

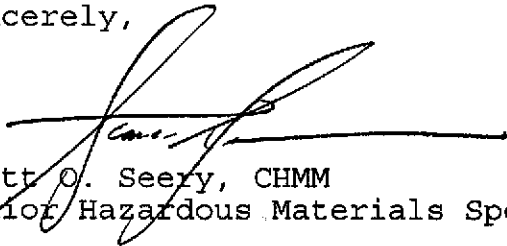
Please be reminded that the final judgement stipulates that NAC is entitled to a credit of up to \$125,000 for certain costs associated with the pending investigations. Agency oversight is amongst those costs for which credit will be applied.

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

A handwritten signature in black ink, appearing to read "Scott O. Seery", is written over a horizontal line. The signature is stylized with a large, sweeping initial "S".

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