

California Fish & Game
FAX Transfer Cover Sheet

To: JOHN SAMUELSON
Fax (510) 569-0505

RESULTS OF ANALYSIS OF SAMPLES COLLECTED
BY WARDENS ROBERT KEVO / HELEN CARR

From : DAVID CRANE

Water Pollution Control Laboratory
2005 Nimbus Road
Rancho Cordova, CA 95670
FAX (916) 985-4301
VOICE (916) 355-0856

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State of California
DEPARTMENT OF FISH AND GAME
Fish and Wildlife Water Pollution Control Laboratory
Request for Laboratory Analysis

Your attention to completion of this form will allow WPCCL chemists and biologists to better serve you. If you have questions regarding any aspect of sampling or the results reported here, please call the appropriate number listed below. Also, if possible, please notify WPCCL prior to arrival of samples. Biology Lab (916) 355-0856; Chemistry Lab (916) 355-0794; ATSS 438-XXXX.

Delivered By: Shane Stahl

Analysis Required: Bioassay Chemical
Heavy metals (Cu, Cd, Pb, Ni, V, Ag, Al)

Date Required: _____ Region _____

Send Results To:
 Name Petroleum Chemistry Laboratory

Agency DEG/OSPR

Address 1995 Nimbus Rd

City Rancho Cordova CA ZIP 95670

For Laboratory Use Only:
 WPCCL Number J-177-94
 Other Number _____
 Field Number _____
 Received By C. Todd
 Date Received 5/5/94
 Date Completed 6/9/94

Phone (916) 355 - 0145

Copies To: _____
 Problem Description (pollutant, source, water color, odor, etc.): Chemical sotrage yard at Oakland Airport.
Has possible leaching into S.F. Bay

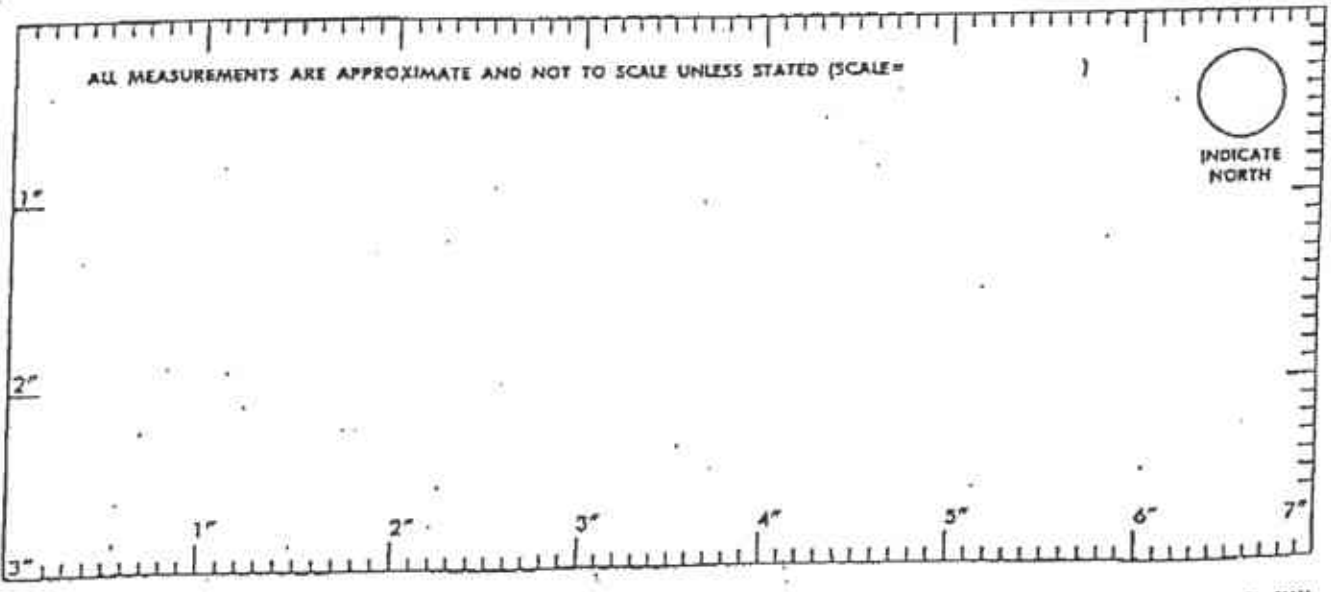
Water Temp. _____ °F or °C (circle one) pH _____ Dissolved Oxygen _____ mg/L (ppm)

Sample Sources (provide diagram below): See map attached

Sample Description (include number and size of containers):
1 Pollutant Water 250 ml jar - analysis not requested for water sample
3 Soil 250 ml jars
 Animal _____
 Animals were alive _____, dying _____, or dead _____ when collected (Check one).

Suspect Sample May Contain:
 Heavy metals
 Petroleum products
 Fertilizer
 Other (specify) _____
 Unknown

Analysis Requested for the Following Reason:
 fish and/or wildlife loss (Date of loss _____; Region _____)
 DFG Code violation (Code Section _____)
 Suspected or potential problem (explain below)
 Routine check



Results of Laboratory Analysis:

Sample Description:

Sampling Date: 4/20/94

- L-177-94-1 0818 hrs S-083-94-5 Soil taken from drain inlet adjacent to NAC's barrel yard.
- L-177-94-2 0925 hrs S-083-94-6 Soil taken from drain on north side of NAC's flight cell
- L-177-94-4 1156 hrs S-083-94-8 Soil taken from storm drain in field east of NAC's barrel yard

Sample #	All metals in µg/g (ppm) dry weight						
	Aluminum	Cadmium	Copper	Lead	Nickel	Silver	Vanadium
10 L-177-94-1	10,800	283	2100	805	76	22.8	52
12 L-177-94-2	16,800	3.4	107	250	76	1.7	66
16 L-177-94-4	10,700	88	217	250	76	3.1	48

Detection Limit: Aluminum 11, Cadmium 0.3, Copper 1, Lead 2, Nickel 1, Silver 0.8, Vanadium 13

Method Reference: Digestion - EPA 3050
Metals - Flame AAS

Cost of Analysis: \$447.00

exceed TTLC

exceed 10 x STLC

nsida Martin
Analyst

6-9-94
Date

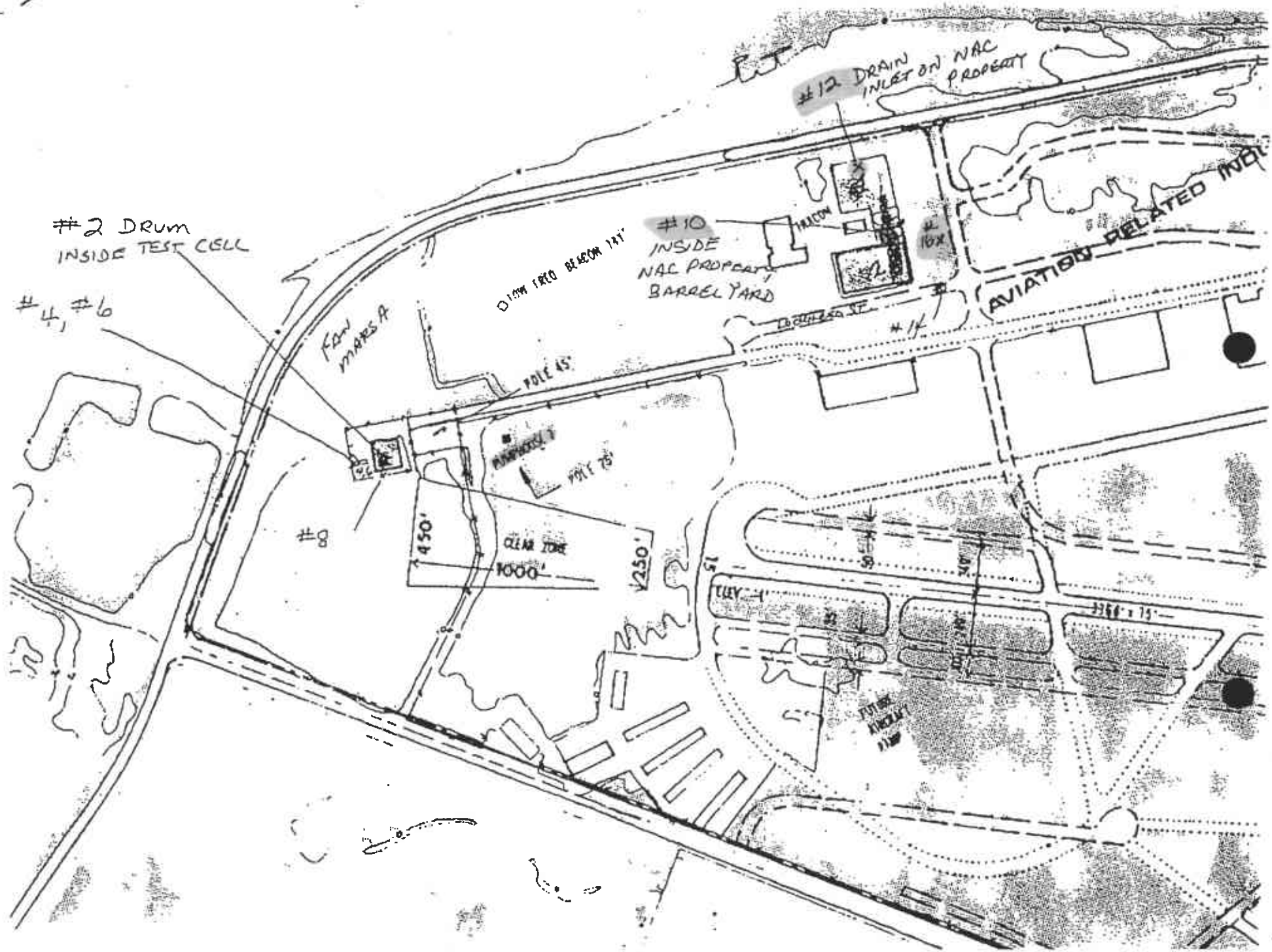
C.R. Todd
Supervisor

6/9/94
Date

Qualitative Significance of Analytical Results:

OBCase
Laboratory Director

6-9-94
Date



Mr. Jim Stroock
CALIF. ENVIRONMENTAL PROTECTION AGENCY
555 Capital Mall, Suite 115
Sacramento, CA 95834

Feb. 14, 1994
REC'D FEB 17 1994
Jim M
Steve C
Stan
Chas

RE: INTENTIONAL CONTAMINATION OF PRESERVED WETLANDS/WILDLIFE
SANCTUARY IN VIOLATION OF FEDERAL AND STATE ENVIRONMENTAL
PROTECTION RULES, STANDARDS AND LAWS; AND RELATED VIOLATIONS.

VIOLATOR: NATIONAL AIRMOTIVE CORPORATION, PORT OF OAKLAND, CA

Dear Mr. Stroock:

We are environmentally aware citizens who have become alarmed by the regular, intentional and flagrant disregard for and violation of, environmental protection regulations by NATIONAL AIRMOTIVE CORPORATION via intentional atmospheric, soil and water pollution. We value our careers and our company, but the present management practice is forcing us to make hard choices. Reluctantly, we have elected to take action by noticing your agency.

NATIONAL AIRMOTIVE CORPORATION is located at 7000 Lockwood Street, Oakland Airport North Field, Oakland, CA, within the boundaries of the Port of Oakland, CA. NATIONAL AIRMOTIVE dismantles, rebuilds, tests, maintains and wends aircraft engines commonly called "jet engines." Chemicals in large quantities are used in the disassembly, cleaning, reconditioning, lubricating, fueling and testing of these engines.

The physical location of NATIONAL AIRMOTIVE on the historic North Field site places it in immediate proximity to the San Francisco Bay; the Airport Channel of San Leandro Bay recreational waterway; Bay Farm Island residences and recreational areas and various adjacent locations devoted to or restricted to recreational use by humans, habitat by animals and food supplies for wildlife and humans. All of the noted areas are within the jurisdiction of State and Federal Environmental Agencies.

We realize that some companies have to be dragged into environmental compliance because their managers have never been environmentally aware and have to be educated, sometimes pushed, into basic compliance because everyone resist change. This is NOT the case with NATIONAL AIRMOTIVE CORPORATION.

NATIONAL AIRMOTIVE CORPORATION is fully aware of its corporate responsibilities and its management have made conscious decisions over informed and reasoned protest, to put corporate profit above environmental responsibility and the law. Here are some examples of their environmental arrogance and corporate greed:

As you know, aviation fuels, particularly "jet" fuel is a petrochemical stew of toxins including components that are virtually impossible to eradicate or even neutralize once they enter the biosphere by undesigned means. [redacted] (Ca, ATE 138, a rare-earth element) is an element that has some unique properties during the combustion process of which it is not an ordinary part

In times of normal business activity and operation, NATIONAL AIRMOTIVE CORP will test-run repaired or repairable engines at the rate of ten to twelve engines per day. Gas turbine engines operated at sea level generate large quantities of pollutants because they are less efficient at low altitudes. The pollutants emitted take the form of visible smoke and noxious fumes from the unefficiently combusted fuel. Hydrocarbons, metals and volatiles are spewed forth in great and toxic quantities. Beginning about three years ago, NATIONAL AIRMOTIVE was receiving sufficient pressure from the public to either take some corrective action or face EPA sanction, since none of the EPA standards were being met. Corrective fuels and systems are available to meet EPA minimum standards, but they cost money. NATIONAL's management reasoned that since it was the visible smoke that revealed them, camouflage would be the cheapest solution since eliminating the visible trail would make detection by the EPA much more difficult and therefore unlikely. This is where the cerium comes in...

A "Cerium Compound" was introduced into the fuel mixture of Test engines. This compound changed the visible spectrum of the combusted fuel resulting in little or no visible smoke. The newly invisible exhaust was hardly less polluting than formerly and because it was now much more difficult to detect, engines could be run longer to permit broader testing. The toxic pollutants were out of sight and as far as NATIONAL AIRMOTIVE management was concerned, that was enough.

In late 1992 a jet fuel transfer line from storage to the engine Test Cell ruptured. Two Thousand Gallons! of toxic aviation fuel drained into the adjacent watershed and wetlands area, only a fraction of which was contained by the Test Cell sump pad. One result was a large underground "plume" of contaminated fuel lying along the water table between the Oakland Estuary and Harbor Bay Isle. An "ecological expert" was spirited in to assess the unreported damage and pronounced the spill an "ecological disaster." The spill was an accident albeit a preventable one; the coverup was entirely intentional.

Currently there exists an oil sump collection basin behind the NATIONAL AIRMOTIVE Test Cell. The capacity of this sump was probably never adequate. From time to time the sump overflows but instead of being deposited on NATIONAL AIRMOTIVE land, it is funnelled through what should be drainwaterpipes, depositing the noxious waste outside the Test Cell and into the preserved wetlands area. As you know, used engine oil contains compounds not compatible with mother nature or mother anything. One of used oils major incompatibilities is resistance to rapid decay. This isn't a case of Uncle Al changing the oil in his van twice a year and dumping the waste, this is big time dumping. The dumping isn't just huge amounts of used oil; paints, solvents, oils, fuels and all kinds of other fluid waste are indiscriminately dumped via this method by NATIONAL. Why pay to get rid of something when you can just dump it in the bay?

NATIONAL AIRMOTIVE CORPORATION is an old and respected Oakland business. Like all successful businesses, founders don't work or live forever and heirs don't always keep the family business going. NATIONAL has changed hands and managers before. Before the present managers, the company didn't like new regulations but they complied with them in the "might as well make the best of it" spirit. That all changed when the present management headed by Mr. Gerry Roberts came in. With him, it wasn't "make the best of it" attitude, it was "us against them." Mr. Roberts is famous around NATIONAL for disregarding anybody's opinion but his own.

He is supposed to have said that you couldn't trust any government official you couldn't buy. Maybe that's because he is a foreigner and doesn't understand that America is a democracy where the people run the country. We know he says things like "you can't run a business and comply with environmental restrictions which will bankrupt you." We know he's not the only manager that doesn't like the EPA, but he sees the EPA as the enemy.

Mr. Gerry Roberts, Mr. John Wiboon and Mr. Greg Marshall are the people who run NATIONAL AIRMOTIVE and make all the decisions. Over the objections of almost everybody else, they, mostly Mr. Roberts, ordered the coverups of environmental violations. Mr. Roberts went so far as to order cat-tails and other pollution resistant plants to be placed around areas he didn't want passers by to look, especially EPA inspectors around the sump pads.

You can verify all the information we have listed by contacting former supervisors especially anybody who was involved in plant and worker safety or plumbing or materials handling or inventory of hazardous materials, or the people who worked for them. The present supervisors and officials are probably, like us, fearful for their jobs. Mr. Roberts is also famous for promptly sacking anyone he thinks he can't trust to follow his orders without question. We have talked to some of them who give the German answer to our questions: "we were only following orders."

We don't want to say who we are. There are rumors going around that something terrible is about to happen here and everybody is afraid to talk to anybody because they might lose their jobs. The company recently paid a huge government fine for some kind of foreign fraud or bribery and word has it that something worse is going to happen next. Whatever happens, the poisoning of the environment has got to be stopped by somebody. We hope your agency hasn't become the kind that Mr. Roberts says he trusts.

Please have somebody do something.

Reluctantly Anonymous Environmentalists.

cc to: Mr. Paul Giardina, CA EPA, Berkeley, CA.

Mr. C. Foster, Director's Office, Port of Oakland, CA

Mr. Jim Stroock
California Environmental Protection Agency
555 Capitol Mall, Suite 515
Sacramento, CA 95814

Jim McGee
Steve Gassen
Steve Haber
March 23 1991
EXECUTIVE DIRECTOR
PORT OF OAKLAND

RE: NATIONAL AIRMOTIVE CORPORATION (NAC) Oakland, CA
Intentional EPA Violations; NEW VIOLATIONS :

Dear Mr. Stroock:

Recently we wrote informing you of intentional atmospheric pollution occurring during test operations of aircraft and industrial gas turbine (jet) engines and associated groundwater and marine pollution by NAC at its Oakland Engine Test Site. Since then we have learned of additional intentional pollution occurring at the nearby Main Plant facility as well.

Briefly restated, NATIONAL AIRMOTIVE CORPORATION (NAC) is a California corporation whose primary U.S. operation is the repair, overhaul and re-supply of Allison Gas Turbine engines for flight and industrial application including civil and military aviation. The operation necessarily requires high volume use of petrochemicals and other common and/or exotic chemicals/compounds including but not limited to; Solvents, Dessicants, Emulsifiers, Lubricants, Fuels, Paints and Bonding Agents of varying toxicity. These substances are all subject to regulation by various agencies including State and Federal environmental authorities with respect to their application and disposal.

NAC is physically located at 7200 Lockheed Street on the East side of Oakland International Airport's historic North Field, Oakland, CA. NAC operates under the complete control of its President, Mr. Gerry Roberts, who maintains his offices on-site at the Oakland Main Plant. Mr. Roberts conducts his presidency as the de facto operational manager. The de jure managers operate as his insulating functionaries rather than actual managers. In criminal parlance, the nominal managers would be described as "button men."

NEW INFORMATION: At the rear of the NAC Main Plant is a hazardous/toxic storage materials yard commonly referred to as the "barrel yard" or the "drum storage yard." All hazardous toxic supplies not located at the Engine Test Site or at operational stations within the Main Plant, are ostensibly stored in this area. Like the previously reported Engine Test Site storage yard, the Main Plant barrel yard has a drainage area including a sump drainable by a lever operated valve referred to by employees as the "drain spigot." We have learned that like the previously reported Engine Test Site sump, the Main Plant barrel yard sump valves directly to a pipe connected to a drain flowing directly into the Oakland Estuary. The Estuary Outlet piping is presumably a relic of decades past military use of what is now NAC property, but the NAC sump drain pipe belongs to and was connected to the relic drain by NAC, fully aware of the illegality of the connection.

Jim Stroock 3 11 84

Unless an inspector knew where the barrel yard sump drain valving led, City, State, County and Federal inspectors could not be faulted for assuming the drain led to an approved contaminant control system, which they were assured it did, although it definitely does not!

When a spill occurs or when operational contaminants need be expeditiously removed from the line, the materiel is unceremoniously dumped into the barrel yard sump and washed to the Estuary. If the waste being dumped temporarily exceeds the capacity of the sump and floods the yard, an emulsifying cleaner is applied to the yard floor, hosed down and when the drain valve is finally closed, the barrel yard is left sparkling clean and the Bay Environment further polluted.

The motive for these intentional dumpings and other operational "shortcuts" is not simply corporate profit, it is personal profit as well. The dollars saved translate to a profit margin from which personal bonus is obtained. From confidential information received it appears that NAC officials actually benefit in bonus several times the amount the corporation itself derives which makes one wonder if the company officials are plundering the company or simply corruptly skimming, defrauding the stockholders... The top officials, Mr. Gerry Roberts, his henchmen, John Wiboch, executive VP and Greg Marshall, Operations Director all receive obscene bonus from practices clearly undertaken solely for personal profit, the public be damned!

We have prior noted that Mr. Roberts, a foreign national, holds everything about America, except its dollars, in complete contempt. He has been heard to say that no company can comply with EPA regulations and stay in business; that no government official can't be had in some way. Mr. Roberts considers himself an expert at manipulating people, especially officials who "think" they are somebody important. Maybe he is an expert. He has certainly manipulated us into lying down, but not into lying down quietly.

In case you are "somebody" Mr. Roberts can't manipulate and we are hoping you are), we thought you might like to know where to look.

Sincerely,

Concerned Environmentalists Who Work.

cc: Mr. Paul Giardina, CA EPA, Berkeley, CA.

Mr. Charles Foster, Dep. Exec. Director, Port of Oakland, CA.