CUMMINGS ENVIRONMENTAL
Environmental, Health & Safety, Consulting & Engineering

Aug. 20, 1998

Madhulla Logan
Alameda County
Environmental Health Department
1131 Harbor Bay Parkway
Alameda, Ca. 94502

Re: 3950 Union Street, Fremont Ca.

Dear Ms. Logan,

Enclosed are documents related to a Request for Closure of a Contamination Case identified as 3950 Union Street, Fremont, Ca.

Following your review of these documents, should you have any questions, please feel free to contact me. My direct line number is 408-358-1714.

I will check back with you in a few days regarding your thinking on this matter.

I have enclosed my card for your files.

Thank you.

Respectfully

G. Cummings

Greg Cummings, REA, CHMM
Cummings Environmental

(408) 947-7400 • FAX: (408) 356-9098

P.O. Box 38003 • Los Gatos, CA 95031-8003

REQUEST FOR CLOSURE OF CONTAMINATION CASE

IN REFERENCE TO

3950 UNION STREET

FREMONT, CALIFORNIA

AUGUST 1998

CUMMINGS ENVIRONMENTAL

Environmental, Health & Safety, Consulting & Engineering

In review of the documents located in the files of the Fremont Fire Department regarding the site identified as 3950 Union Street, Fremont, I recommended resampling the soil at the locations where the highest levels of contamination where found, for those substances which Julie S. Belomy of the Fremont Fire Department had indicated the need for samples to be analyzed by WET test in July of 1994.

On July 22, 1998 sampling was accomplished and from July 28 through July 30 lab extraction was performed with analysis done on July 30th. The analysis results indicated that under the California Code of Regulations, section 66261.24 Characteristics of Toxicity, copper from sample point #1 at the 12" level and lead from sample point #2 at the 30" level were found to be hazardous waste. Copper has a limit of 25 mg/l and was found at 34 mg/l and lead has a limit of 5mg/l and was found at 7.7 mg/l.

Based on the historic 1994 TTLC results and these current STLC results, an extrapolation would infer that levels of contamination at the other identified sample points would not exceed the levels identified under section 66261.24 and therefore would not be considered hazardous. Thus the site appears to have a small area, now identified as the area along the south side of the former building pad. On site observation by Registered Geologist Roger Dockter, who directed the sampling, indicates that this area may lie along the line of a historic drain.

In consideration of the available data and the development plans for the site, the hazard presented by this minims contamination appears negligible.

In discussions with Selim Zeyrek of the Alameda County Water District, it is apparent the District does not perceive that these metals at these levels in this location presents a threat to drinking water. As such the concern for a health impact resulting from ingestion is not an issue.

Development of the site will preclude the opportunity for either an inhalation or dermal exposure to these materials at a level and duration which would suggest a health threat. The soil will be covered with fill, then building pads, concrete areas and asphalt areas, effectively segregating the materials from human interface.

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P.O. Box 38003 • Los Gatos, CA 95031-8003

The size of the source suggested by the current and historic sampling, the levels of contamination identified by the analysis, and the development plans for the site do not indicated a potential health risk at levels of concern.

Going back to the issue identified in the July 21, 1995 letter from Julie Belomy to Mike Mullinix, I believe there is now sufficient analytical and site data to be able to formally "close" this contamination case.

Respectfully

G. Cummings

Greg Cummings, REA, CHMM
Cummings Environmental

REQUEST FOR CLOSURE OF CONTAMINATION CASE

1998 DOCUMENTS

IN REFERENCE TO

3950 UNION STREET

FREMONT, CALIFORNIA

SOIL SAMPLING REPORT

3950 UNION STREET

FREMONT, CALIFORNIA

PREPARED FOR MR. BEN ASHLEY

PREPARED BY

CUMMINGS ENVIRONMENTAL
PO BOX 38003
LOS GATOS, CA. 95031-8003

DOCKTER ENVIRONMENTAL CONSULTING

SOIL SAMPLING REPORT

3950 UNION STREET
FREMONT, CALIFORNIA

Prepared for:

Cummings Environmental
P.O. Box 38003, Suite 109-174
Los Gatos, California 95031-8003

Prepared by:

Dockter Environmental Consulting
P.O. Box 1532
Soquel, California 95073-1532

July 31, 1998

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SOIL SAMPLING REPORT

3950 UNION STREET
FREMONT, CALIFORNIA

July 31, 1998

I. INTRODUCTION

This report documents activities related to the collection of soil samples at 3950 Union Street, Fremont, California. A cold silver shop was previously located at the site. Soil samples were previously collected at the site and analyzed for selected metals. The scope of work for this project consisted of the sampling of soil near two previous locations with elevated total metal concentrations. The goal was to determine the soluble concentrations of metals present in the soil. The soil sampling was conducted on July 22, 1998. The two locations were near the previously sampled locations 1 and 2.

II. SUMMARY OF WORK AT SITE

A soil sample was collected at a depth of 12 and 30 inches below grade at each location. The sample locations were identified as SS-1 and SS-2. The locations were believed to be in close proximity to previous locations 1 and 2, respectively. Table 1 summarizes the soil sampling analytical results. Figure 1 shows the site and the sample locations. Appendix A contains the certified analytical reports and associated chain of custody documents.

III. OBSERVATIONS DURING SOIL SAMPLING

Soil borings SS-1 and SS-2 were advanced to a total depth of 30 inches. Groundwater was not present in either boring. The upper 22 inches was noted as being a fill material with occasional fragments of brick and glass. Below 22 inches was a unit composed of fine sand with scattered granules.

Circular filled holes were seen in the area where samples 1 and 2 had been collected. Sample locations SS-1 and SS-2 were placed adjacent to these assumed previous sample locations. When augering for sample SS-2, a rubber pipe coupling was seen on one side of the boring. Therefore, this sample may have been collected near a former drain line.

IV. SOIL SAMPLING

Soil samples were obtained by advancing an 3-inch diameter stainless steel hand auger to the desired depth and then driving a 2-inch diameter sampler into the soil at the bottom of the hole. The soil samples from a depth of 12 inches were collected in a fill material and those from 30 inches appeared to represent native soil. Samples from location SS-1 were analyzed for copper, silver, and cyanide. The samples collected from boring SS-2 were analyzed for lead. Table 1 presents the soil sample descriptions, lists the analyses performed, and results.

V. METHODS AND PROCEDURES - SOIL SAMPLE COLLECTION

The soil sampling conformed with the generally accepted methods for soil sample collection. Specifically, the sampling procedures were as follows:

- All sampling equipment was thoroughly cleaned prior to use.
- The soil sample was collected using a hammer driven drive sampler containing stainless steel liners (tubes). Sloughed material was collected at the top of the drive sampler in a slough ring, while undisturbed soil was collected in the lower part of the sampler containing the sample tube.
- Immediately after the sample was collected, each end of the sample tube was covered with a sheet of Teflon and then sealed with an airtight plastic cap. Care was taken to assure that no head-space was present in the sampling tube.
- The soil samples were labeled and immediately placed into a refrigerated ice chest. The samples were delivered to McCampbell Analytical, Inc., which is certified by the California Department of Health Services (DHS) to perform the specified analyses.

Chain-of-custody documentation was maintained for the sampling event; a copy is provided in Appendix A.

VI. LABORATORY ANALYSIS

The samples collected on July 22, 1998 were analyzed on a 5-day turnaround. Soil samples SS-1@ 12" and SS-1@30" were analyzed for cyanide by EPA method 9010. The results indicated non-detectable concentrations (< 0.25 mg/kg) of cyanide. An soluable threshold limit concentration (STLC) extraction was also performed on these samples and used for analysis of copper and silver by the ICP method. The STLC for copper for SS-1 @ 12" was 34 mg/L. The STLC for silver for SS-1 @ 12" was ND (<0.010 mg/L). The STLC for copper for SS-1 @ 30" was ND (<0.5 mg/L). The STLC for silver for SS-1 @ 30" was ND (<0.010 mg/L). An STLC extraction was performed on soil samples SS-2@12" and SS-2@30". The extract was then analyzed for lead using EPA method 6010. Sample SS-2@12" contained 2.2 mg/L of lead and sample SS-2@30" contained 7.7 mg/L of lead.

VII. CONCLUSIONS

On the basis of the sampling, analysis, and observations , DEC concludes that:

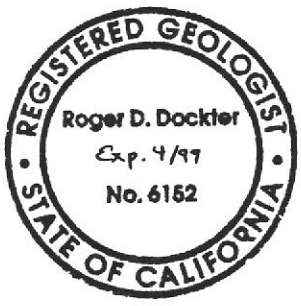
1) The STLC regulatory value for copper has been exceeded in soil sample SS-1@12" and the STLC value for lead has been exceeded in soil sample SS-2@30".

VIII. RECOMMENDATIONS

1) Contact the local regulatory agency to discuss further actions for the concentrations found that exceed the STLC's.

IX. CERTIFICATION

To the best of my knowledge, all statements and information provided above are true and correct.



Roger D. Dockter

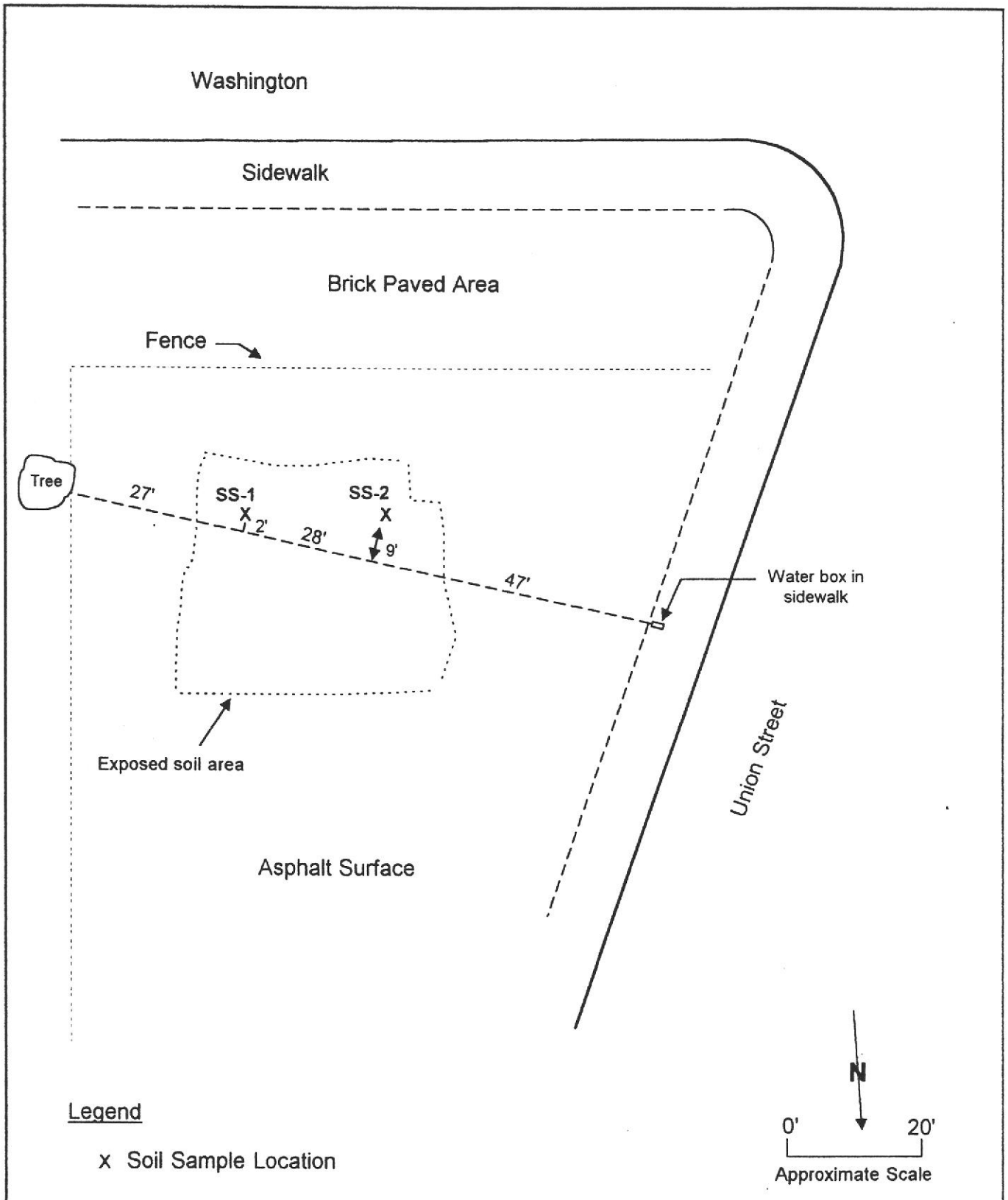
Roger D. Dockter
Registered Geologist (CA # 6152)

X. DISTRIBUTION

Mr. Greg Cummings
Cummings Environmental
P.O. Box 38003, Suite 109-174
Los Gatos, CA 95031-8003

DEC	TABLE 1 - RESULTS OF SOIL SAMPLE ANALYSES 3950 Union Street, Fremont, California								
Sample I.D.	Sample Location	Depth (inches)	Date	Sample Type	Cyanide[1] mg/kg	Copper[2] mg/L	Silver[2] mg/L	Lead[2] mg/L	Description
Soil Samples									
SS1@12"	SS-1	12	7/22/98	Soil	ND <0.25	NA	NA	NA	Gravelly silty clay, very dark gayish brown 10YR 3/2
SS1@30"	SS-1	30	7/22/98	Soil	ND <0.25	NA	NA	NA	Fine sand with granuels
SS2@12"	SS-2	12	7/22/98	Soil	NA	34	ND<0.010	2.2	Gravelly silty clay, very dark gayish brown 10YR 3/2
SS2@30"	SS-2	30	7/22/98	Soil	NA	ND<0.5	ND<0.010	7.7	Fine sand with granuels
Reporting Limit					0.25	0.5	0.010	.005	
STLC					-	25	5.0	5.0	-

Notes:
ND = Below reporting limit
NA = Not sampled/analyzed
STLC = Soluble Threshold Limit Concentration. Units are mg/L.
[1] = Analyzed by EPA Method 9010
[2] = Anaylzed by EPA Method 6010



Dockter Environmental Consulting P.O. Box 1532 Soquel, California	**Site Map** 3950 Union Street Fremont, California	**Figure 1** Project No. 101-10.1

APPENDIX A

CERTIFIED ANALYTICAL REPORT

GeoAnalytical Laboratories, Inc.

1405 Kansas Avenue
Modesto, CA 95351

Phone (209) 572-0900
FAX (209) 572-0916

CERTIFICATE OF ANALYSIS

Report # J208-03

McCampbell Analytical
110 2nd Avenue #D7
Pacheco CA 94553-5560

Date of Report: 07/30/98
Date Received: 07/27/98
Date Started: 07/27/98
Date Completed: 07/30/98

Project Name: DEC-101-10.1

Project # 11827

Sample ID	Lab ID	Detection Limit	Method	Analyte	Results	Units mg/Kg
SS 1 @12"	J21201	0.25	9010	Cyanide	ND	
SS 1 @ 30"	J21202	0.25	9010	Cyanide	ND	

Ramiro Salgado
Chemist

Certification # 1157

Donna Keller
Laboratory Director

McCAMPBELL ANALYTICAL INC.
110 Second Avenue South, #D7, Pacheco, CA 94553-5560
Telephone : 925-798-1620 Fax : 925-798-1622
http://www.mccampbell.com E-mail: main@mccampbell.com

Dockter Environmental Consulting P.O. Box 1532 Soquel, CA 95073-1532	Client Project ID: #101-10.1; Former Cold Silver Shop	Date Sampled: 07/22/98
		Date Received: 07/23/98
	Client Contact: Roger Dockter	Date Extracted: 07/28-07/30/98
	Client P.O:	Date Analyzed: 07/30/98

Metals by ICP*

EPA analytical methods 6010, 200.7

Lab ID	Client ID	Matrix	Extraction"	Copper	Silver
92633	SS 1 @ 12"	S	STLC	34	ND
92634	SS 1 @ 30"	S	STLC	ND	ND
Reporting Limit unless otherwise stated; ND means not detected above the reporting limit		W	TTLC	0.5mg/L	0.05
		S	TTLC	2.0mg/kg	2.0
		---	STLC/TCLP	0.5mg/L	0.010

* water samples are reported in mg/L, soil and sludge samples in mg/kg, wipes in ug/wipe and all TCLP / STLC / SPLP extracts in mg/L

" EPA extraction methods 1311(TCLP), 3010/3020(water,TTLC), 3040(organic matrices,TTLC), 3050(solids,TTLC); STLC - CA Title 22

* reporting limit raised due to matrix interference

i) liquid sample that contains greater than ~2 vol. % sediment; this sediment is extracted with the liquid, in accordance with EPA methodologies and can significantly effect reported metal concentrations. j) dissolved iron assumed to be equal to ferrous iron.

DHS Certification No. 1644

Edward Hamilton, Lab Director

McCAMPBELL ANALYTICAL INC.
110 Second Avenue South, #D7, Pacheco, CA 94553-5560
Telephone : 925-798-1620 Fax : 925-798-1622
http://www.mccampbell.com E-mail: main@mccampbell.com

Dockter Environmental Consulting P.O. Box 1532 Soquel, CA 95073-1532	Client Project ID: #101-10.1; Former Cold Silver Shop	Date Sampled: 07/22/98
		Date Received: 07/23/98
	Client Contact: Roger Dockter	Date Extracted: 07/28-07/30/98
	Client P.O:	Date Analyzed: 07/30/98

Lead*

EPA analytical methods 6010/200.7, 239.2"

Lab ID	Client ID	Matrix	Extraction **	Lead*	% Recovery Surrogate
92635	SS 2 @ 12"	S	STLC	2.2	NA
92636	SS 2 @ 30"	S	STLC	7.7	NA
Reporting Limit unless otherwise stated; ND means not detected above the reporting limit		S	TTLC	3.0 mg/kg	
		W	TTLC	0.005 mg/L	
		---	STLC/TCLP	0.2 mg/l	

* soil and sludge samples are reported in mg/kg, wipe samples in ug/wipe, and water samples and all STLC / SPLP / TCLP extracts in mg/L.

Lead is analysed using EPA method 6010 (ICP)for soils, sludges, STLC & TCLP extracts and method 7,0,2 (AA Furnace) for water samples

" EPA extraction methods 1311(TCLP), 3010/3020(water,TTLC), 3040(organic matrices,TTLC), 3050(solids,TTLC), STLC - CA Title 22

^ surrogate diluted out of range; N/A means surrogate not applicable to this analysis

& reporting limit raised due matrix interference

0 liquid sample that contains greater than ~2 vol. % sediment; this sediment is extracted with the liquid, in accordance with EPA methodologies and can significantly effect reported metal concentrations

DHS Certification No. 1644

Edward Hamilton, Lab Director

Dockter Environmental Consulting
(408) 476-7352 • Fax (408) 476-9292
P.O. Box 1532
Soquel, CA 95073-1532

1827 xdec

CHAIN-OF-CUSTODY RECORD

PROJECT NUMBER	PROJECT NAME
101-10.1	Former Cold Silver Shop

Send Report Attention of:	Report Due	Verbal Due
Roger Dockter	/ /	/ /

Sample Number	Date	Time	Comp	Matrix	Station Location	Number of Cntnrs	Type of Containers	Type of Analysis: Lead (Wet)	Copper (Wet)	Silver (Wet)	Cyanide	Condition of Samples	Initial
SS1@12"	7/22/98	1:15		S	Former Sample location #1	1	2"ø Stainless Tube		X	X	X		92633
SS1@30"	7/22/98	1:37		S	Former Sample Location #1	1	"		X	X	X		92634
SS2@12"	7/22/98	2:15		S	Former Sample Location #2	1	"	X					92635
SS2@30"	7/22/98	2:42		S	Former sample location #2	1	"	X					92636

ICE/ ✓
GOOD CONDITION ✓
HEAD SPACE ABSENT ✓
Cooler Recieved/ Sealed by ARC.

PRESERVATION APPROPRIATE CONTAINERS ✓

VOAS | O&G | METALS | OTHER

Relinquished by:(Signature)	Date/Time	Received by: (Signature)	Date/Time
Roger Dockter	7/23/98	Amy A. Phillips	7/23/98 1:20pm
Relinquished by:(Signature)	Date/Time	Received by: (Signature)	Date/Time
Relinquished by:(Signature)	Date/Time	Received by Lab:	Date/Time

Remarks:
Take sample from end of tube identified by X or that arrows point to

COMPANY: sue abrica
ADDRESS:
PHONE :
FAX :

REQUEST FOR CLOSURE OF CONTAMINATION CASE

1995 DOCUMENTS

IN REFERENCE TO

3950 UNION STREET

FREMONT, CALIFORNIA

CITY OF FREMONT
FIRE DEPARTMENT

July 21, 1995

Mr. Mike Mullinix
Mike Mullinix Commercial Real Estate
1901 South Bascom Ave., Ste. 1330
Campbell, CA 95008

OFFICIAL NOTICE

RE: SUBMITTAL OF ANALYSES FROM SOIL SAMPLING
3950 UNION STREET, FREMONT

Dear Mr. Mullinix:

On January 6, 1995, I witnessed soil sampling of four (4) locations at the above-referenced property. Sampling was performed by Robb Welch of E_2C; samples were taken from depths of from 12 - 15" below grade; and samples were to be analyzed for copper, lead, cyanide, nickel and silver.

To date, I have not received results for this sampling.

One reason the sampling was performed at this site is because this office has been unable to formally "close" its contamination case on the site due to lack of analytical information. Accordingly, this is a formal request for submittal of documentation of sampling performed.

Please note that should these results indicate the site does indeed have a contamination/hazardous waste problem, such that it may present a threat or imminent danger to the environment, public health, and safety, both you and Mr. Welch may be in violation of State and local discharge reporting requirements.

I look forward to receipt of the sample results forthwith.

Please call me at (510) 494-4236 if you have any questions.

Sincerely,

Julie S. Belomy
Fremont Fire Department
Hazardous Materials Unit

c: Jim Gonzales, City Attorney
Gil Jensen, Alameda County District Attorney
Steven Inn, Alameda County Water District
Robb Welch, E_2C

(510) 494-4285 PHONE • (510) 494-4822 FAX
39100 LIBERTY ST. P.O. BOX 5006 • FREMONT, CALIFORNIA 94537-5006

E2C Inc.

Environmental/Engineering Consultants

FAX TRANSMISSION

TO:	Julie Belomy	FROM:	Robb Welch
COMPANY:	Fremont Fire Department	FAX NO:	(408) 745-1089
FAX NO:	(510) 494-4822	DATE:	December 7, 1994
RE:	3950 Union Street		

★★

Julie,

The following is an updated table which includes the cyanide analysis. Let me know if you get an STLC for cyanide. I've got a feeling that any is bad news.

Summary of November 22, 1991 Laboratory Analysis

Sample I.D.	Cr	Cu	Ni	Pb	Ag	Cyanide
1-1	60.5	264	62.2	3.0	61.0	22
1-2	36.1	193	45.5	59.4	90.0	21
2-1	54.9	145	45.9	ND	6.4	3.3
2-2	24.2	76.3	61.1	228	30.0	5.5
3-1	54.0	176	39.1	ND	4.7	3.9
3-2	19.2	29.2	22.4	110	.97	4.0
4-1	78.7	86.7	54.0	19.0	4.7	5.6
4-2	30.0	105	51.0	171	62.5	9.2
5-1	35.5	144	123	12.9	19.8	28
5-2	63.2	71.4	80	9.0	13.1	25
STLC	560	25	20	5.0	5	?
STLC X 10	5600	250	200	50	50	—

1220 Crossman Avenue, Suite 200 • Sunnyvale, California 94089 • (408) 747-1414 • FAX (408) 745-1089

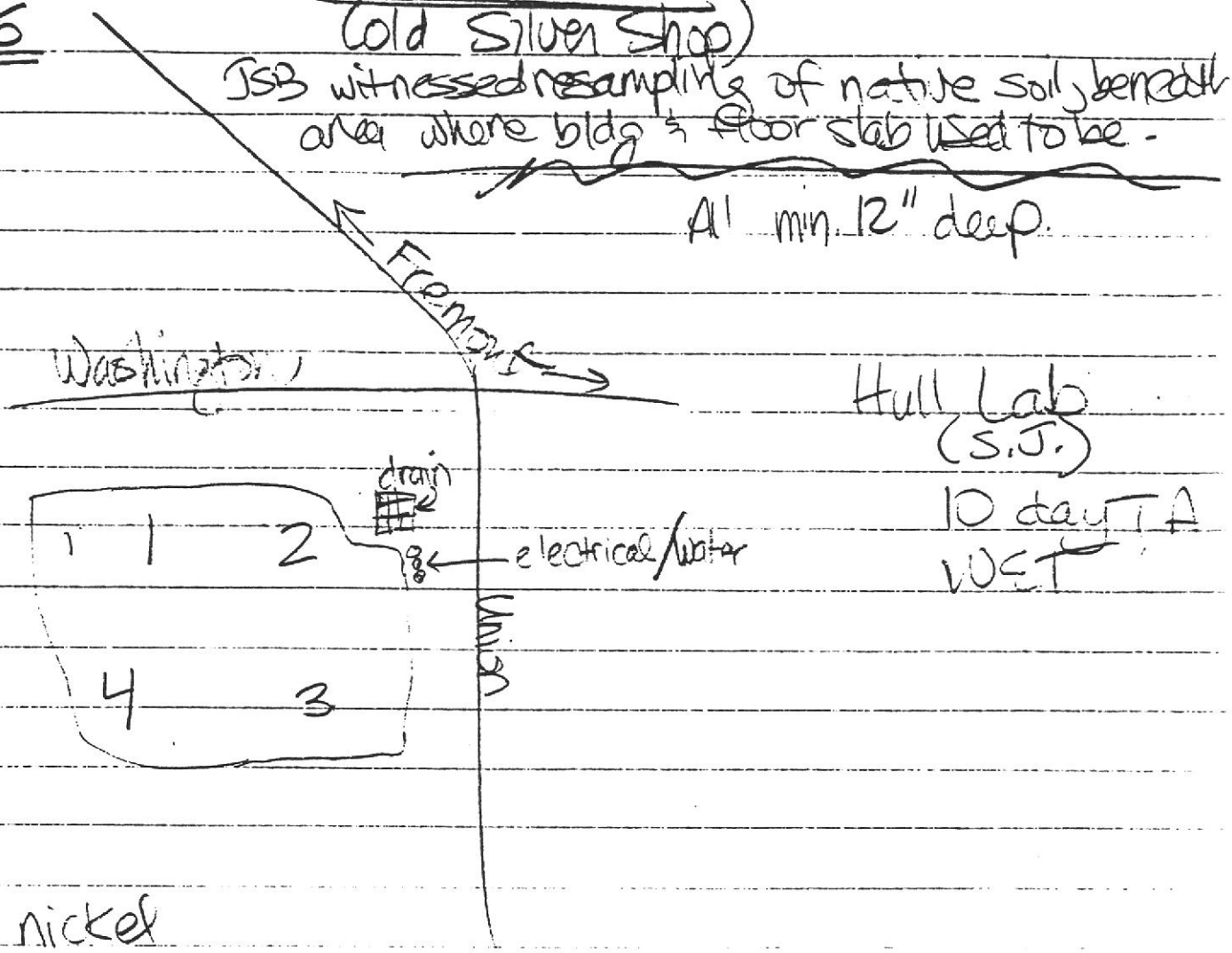
1:05 - 2:30

1/6/95

3950 Union
(Cold Silver Shop)

JSB witnessed resampling of native soil beneath area where bldg's floor slab used to be.

All min. 12" deep.



nickel
~~zinc~~
copper
lead
silver
cyanide

REQUEST FOR CLOSURE OF CONTAMINATION CASE

1994 DOCUMENTS

IN REFERENCE TO

3950 UNION STREET

FREMONT, CALIFORNIA

December 8, 1994
Job Number 5510200

Mr. Mike Mullinix
Mike Mullinix Commercial Real Estate
1901 South Bascom Avenue, Suite 1330
Campbell, CA 95008

SUBJECT: PROPOSAL - SOIL SAMPLING AND ANALYSES
3950 Union Street
Fremont, California

Dear Mr. Mullinix:

E_2C, Inc. presents herein our proposal to perform the necessary soil sampling and analyses to request Site Closure from the City of Fremont. We met at the site on December 7, 1994 with Ms. Julie Belomy, who represented the City of Fremont, to evaluate the location of the soil samples and to determine the appropriate chemical analyses.

As a result of the field meeting, it was concluded that we will collect a soil sample at each corner of the former concrete slab location. The sample depth will be 12-15 inches below the ground surface. Each sample will be analyzed for the presence of copper, lead, cyanide, nickel, and silver. Ms. Belomy will be present in the field during the soil sample collection phase of our study. The samples will be analyzed on a normal ten working-day cycle, using the waste extraction test (*WET*) method. The results of our field investigation and laboratory analyses will be presented in a formal report. Based upon the results of our study, we will present appropriate recommendations for any abatement activities that may be required.

Hull Development Labs

1149 Minnesota Ave., San Jose, CA 95125 Tel: (408) 287-1777 Fax: (408) 287-1786

Chain of Custody/Analysis Work Order

Client: EzC, Inc
Address: 1220 Crossman Ave
Contact: Robb Well
Telephone #: 747-1414
Date Received: ~~12-3-94~~ 1-2-95
Turn Around: Standard

Project ID: 1060101
Purchase Order #:

Sampler/Company: EzC Inc
Telephone #:

Special Instructions/Comments

LAB USE ONLY

Samples arrived chilled and intact:

Yes No

Notes:

Sample Information / **Requested Analysis**

Lab #	Sample ID	Grab/ Composite	Matrix	Date Collected	Time Collected	Pres.	Sample Container	8010							
1	mw1		Water	12-2-94	PM.	Ice	40ml	✓							
	mw2		↓	↓	↓	↓		✓							
	mw3							✓							
	mw4							✓							

Relinq. By:	Received By:	Date	Time
Robb Well	Brenda [illegible]	1/3/94	0:30
Relinq. By:	Received By:	Date	Time
Relinq. By:	Received By:	Date	Time

CITY OF FREMONT
FIRE DEPARTMENT

July 12, 1994

Mr. David Wood
Phases Environmental
355 W. Olive St., Ste. 108
Sunnyvale, CA 94086

RE: REQUEST FOR CASE CLOSURE
FORMER SILVER SHOP
3950 UNION STREET, FREMONT

Dear Mr. Wood:

I have reviewed the packet submitted to me dated May 25, 1994, regarding the above-referenced site. My review indicates the information as submitted is inadequate for me to sign-off on the case.

As we have discussed on the phone, and I have confirmed with Alameda County Health Services - Division of Hazardous Materials, one standard procedure used to determine whether a material is a hazardous toxic waste is as follows:

1. Levels of a substance in a waste are greater than or equal to the regulatory total threshold limit concentration (TTLC) value for that substance;

2. If levels of metals exceed 10 times* the allowable soluble threshold limit concentration (STLC) specified in Title 22 CCR (Section 66261.24(a)(2)(A)), a waste extraction test (WET) is required. If the results of the WET exceed the allowable STLC values in Title 22, the sample is considered hazardous waste.

* (Title 22 CCR Appendix II is entitled Waste Extraction Test Procedures. Item (b) of this appendix states "...the WET shall be carried out if the total concentration in the waste, or other material, of any substance listed in section 66261.24(a)(2) **equals or exceeds** the STLC value, but does not exceed the TTLC value..." (emphasis added). Thus the regulations require a WET for ANY amount equaling or exceeding the STLC, and do not even require the amount to be 10 times the STLC).

Sample results submitted show we have a situation where several results for metals exceeded 10 times the allowable STLC values

(510) 494-4285 PHONE • (510) 494-4822 FAX
39100 LIBERTY ST., P.O. BOX 5006 • FREMONT, CALIFORNIA 94537-5006

(metals exceeded are silver, chromium, copper, and lead). Unfortunately, it does not appear from the material submitted that WET tests were subsequently run on the samples in order to determine the overall leachability of the hazardous substances in the soil.

Obviously this creates a problem at this late date since the samples are no longer available from which to run WET tests. To further complicate matters, an adequate sampling map was not provided in the report prepared by USPCI. I contacted USPCI and was faxed the attached map. It gives some measurements which may help us to determine where the building was, but still does not show sample locations.

During our discussions, you asked what will be required in order to achieve sign-off for this site. I spoke to the County regarding the possibility of using the sample results we currently have in a risk analysis scenario; however, it was decided risk analysis cannot be done without the solubility data which would be obtained by running WET tests. Thus, we're back to square one.

Unless USPCI is able to locate data showing the WET tests were already done, it appears resampling and analysis will be necessary in order to obtain case closure. This will hold true whether Alameda County or City of Fremont takes the lead in this case (going through Cal-EPA costs approximately $8000 - $10,000 for review).

I would be happy to meet with you and/or the Valencias to further discuss this situation so we can reach as amicable a solution as possible. I may be reached at (510) 494-4236.

Sincerely,

Julie Belomy
Fremont Fire Department
Hazardous Materials Unit

cc: Richard Valencia
Paul Smith, Alameda County Health Agency
David Anderson, USPCI

PHASES
PHASES
Environmental

355 W. Olive St., Suite 108, Sunnyvale, CA 94086-7612
(408)733-8384 Fax (408)733-8386

June 22, 1994

JUN 30 1994

Julie Belomy
Hazardous Materials Technician
Fremont Fire Department
39100 Liberty Street
Fremont, CA 94538

Dear Julie,

Pursuant to our phone conversation on 21 June 94, you'll find enclosed for your information a copy of Chapter 11, Article 3, Identification and Listing of Hazardous Waste, concerning Characteristics of Hazardous Waste, in Title 22 of the California Code of Regulations. Highlighted is the section concerning the TTLC (Total Threshold Limit Concentration) limits of solids that when exceeded classify the solid as a hazardous waste.

Below is a table of identification amd concentrations of elements detected during demolition of "The Silver Shop", the TTLC limits and a calculated percentage of the elements versus TTLC.

Substance Found	TTLC (ppm)	Actual Maximum Concentration of Element (ppm)	Percentage of TTLC
Silver (Ag)	500	90	18 %
Chromium (Cr)	500	86	17 %
Copper (Cu)	2500	264	10 %
Nickel (Ni)	2000	123	6 %
Lead (Pb)	1000	223	22 %

As you can see none of these even approach one quarter of the TTLC limits.

It is our experience, as reaffirmed by our California Department of Health Service certified laboratory, Priority Environmental Labs of Milpitas, that the STLC (Soluble Threshold Limit Concentration) are only run if the TTLC limits are approached or exceeded by the suspect contaminant. The TTLC values were developed with scientific input concerning the concentration, and solubilities, of particular elements in reqard to its toxicity.

It is our position that none of the samples tested by USPCI for "The Silver Shop" would be classified as a hazardous waste and therefore no environmental cleanup is warranted. We would hope that you will find this information useful. Please call if we can be of any further help.

Sincerely,

David K. Wood

David K. Wood

cc: Richard and Guadalupe Valencia
Greenback Loan, Inc.
7102 Thornton Avenue
Newark, CA 94560

3950 Union St

PHASES
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PHASES
Environmental

355 W. Olive St., Suite 108, Sunnyvale, CA 94086-7612
(408)733-8384 Fax (408)733-8386

25 May 1994

JUN 6 1994

Ms. Julie Belomy
Hazardous Materials Technician
Fremont Fire Department - Administration
39100 Liberty
Fremont, CA 94539-5006

Property Address: (Silver Shop)
3950 Union Street
Fremont, California

Dear Ms. Belomy:

Enclosed please find a copy of a 1991 USPCI report in submittal for closure for the property listed above. We are forwarding this report as a courtesy to our client who was unaware of the need to provide you with this information as well as formally request site closure.

We have performed a Phase I Environmental Site Assessment and have concluded that there is no obvious on-site environmental risk and very little risk to the site from off-site sources. We have reviewed the USPCI report and find it to be well-documented and researched. Any questions about this site should be directed to USPCI. Their telephone number is (916) 921-2202.

If we can be of any further help, please feel free to call.

Sincerely,
David K. Wood.
David K. Wood
Project Manager/REA #05474

pager
408 229 5649

PHASES
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Environmental
Site Assessment Services
David K. Wood
Registered Environmental Assessor
355 W. Olive St., Suite 108, Sunnyvale, CA 94086
(408)733-8384 Fax (408)733-8386

GREENBACK PAWN SHOP INC.
7102 Thornton Avenue
Newark, CA 94560
(510) 745-9696

25 May 1994

Ms. Julie Belomy
Hazardous Materials Technician
Fremont Fire Department - Administration
39100 Liberty
Fremont, CA 94539-5006

Re: Environmental Report for Closure
Formerly - The Silver Shop
3950 Union Street
Fremont, California

Dear Ms. Belomy:

Enclosed find the documentation for the removal of contaminated debris for the above listed property prepared by U.S. Pollution Control, Inc. in application for site closure. USPCI can be reached at (916) 921-2202.

I declare, under penalty of perjury, that the information and/or recommendations contained in the attached report are true and correct.

Please send me a letter denoting your acceptance of this report and closure of the site. If you have any questions, please call me at (510) 745-9696.

Sincerely,

Richard Valencia
Greenback Loan, Inc.