

5/8/91

11:39 Called Dan Ward of DHS Site Mitigation Unit  
(PASD) at 916/324-~~2~~2433. I left a message  
asking for guidance on cleaning up a former rifle range.

5/6/91  
must be collecting chunks of metal not contaminated with powdered metal.

Bob said scrap metal, defined as pieces  $> 100 \mu\text{m}$ , is exempt from regulation as a hazardous waste under 6.5.

However, site cleanups are done under 6.8 on the basis of risk assessments (Threat to public health and safety). Thus the point is most if the material is scrap metal; cleanup is not exempted by the scrap metal exemption.

However - if the material is not a hazardous waste, might not need a permit to treat/separate the waste.

5/7/91  
3:00 Spoke with Lester Feldman. Lester said as for all sites, the extent of soil contamination and the quality of groundwater would have to be determined. Lester said 3 wells needed to be installed + monitored for metal contamination + salinity (total dissolved solids). Wells need to be monitored quarterly. Tidal influence needs to be determined. Gradient must be established. Water quality on site must be compared with "background" water quality off the site.

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John said sites sometimes don't get cleaned up because the cleanup would be too huge. I told John the range used to be under water but was now filled. The whole time the site was used as a rifle range - this shot ~~would be~~ (+ clay pigeons) would be throughout the soil from the water table to the current soil elevation. John said in cases where contamination is so extensive, site characterization and exposure/risk assessment are ~~rely~~ relied on. John said I should talk to DHS Technical Services Group (Jeff Wong's group) to get input on how to do environmental risk assessments - if I have questions on that.

4:22 Called Lester Feldman & left a message.

4:30 Called Dick Rudloff of the City of Alameda (748-4552) to tell him what I've found out so far.

4:48 Spoke with Bob Hoffman. Bob said if the range is an outdoor range, not as much metal dust would have been generated as if it were an indoor range. Bob said indoor ranges generate lots of metal dust because the ~~bullet~~ bullets hit hard shields and disintegrate upon impact. Bob said that if a mechanism is used to separate shot from dirt which doesn't generate dust (in the separation process), DHS won't require a permit. Bob said that the process

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permit because the sieving was viewed as treatment of a hazardous waste

2:48 Called Bob Hoffman (916/324-1084) + left a message

2:50 Called Dan Ward (916/324-2433, Site Mitigation Unit) + left a message requesting guidance on how to handle clean up of a former rifle range.

3:09 Called John Wessonsky (916/322-2543, Remedial Technology Unit) to ask about technology for clean up of rifle ranges. John said the two main options (treatment) for clean up of shot contaminated soil are

① Sieving to remove the shot. This may be covered under permit by rule as a process which changes only physical properties of the waste (66747(a)(6) or under a subsequent section on soil contaminated with metals. Norm Reley, DHS PASD Permitting Unit (in Sacramento) is the person to ask about where/if sieving falls under PBR. John said sieving is a treatment.

② Stabilization of soil containing metals

John said the clay pigeon remains ought to be characterized. A rifle range at McClelland air force base had PNA contamination due to "pigeons". Thus characterize pigeons for PNA + metals.

500 Maitland Drive, Alameda 94501

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2:27 Called DHS Alternative Technology (916/324-1807). Spoke with Peggy Harris. Peggy referred me to:

- DHS PASD Site Mitigation Unit, Dan Ward (916/324-2433)
- ✓ DHS PASD Remedial Technology Unit, John Wernowsky (916/322-2543)

Peggy said she didn't think the scrap metal exemption applied to contaminated soil. She also thought the scrap metal exemption is irrelevant to cleanups criteria requirements (these are based on protecting the public health and the environment). Peggy referred me to the waste evaluation unit (916/322-3670).

2:41 Called the DHS ATD Waste Evaluation Unit (916/322-3670) & spoke to Diana Peblers. Diana said the shot couldn't just be left in place "under the scrap metal exemption". Diana said if the intent is to leave the shot in place, it becomes a hazardous waste. Diana said I should talk to Bob Hoffman he is with the DHS Toxic Subst. Control Prog. legal office, & he knows what the legal intent/requirements for removing the shot are. Diana said there was a rifle range site in southern CA where the owner wanted to sieve the berm sand & remove the shot & then recycle the shot. Diana thinks the owner had to get a

**IMPORTANT MESSAGE**

FOR Ed  
DATE 4/12 TIME 1:58 A.M.  
P.M.  
M.R. D. Rudloff  
OF City of Alameda  
PHONE 748-4552  
AREA CODE NUMBER EXTENSION

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	<input type="checkbox"/>	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE Ala. Gun Club - CAN  
you provide current status

SIGNED Shuley  
LITHO IN U.S.A.

9/14/90

10:20 Meeting w/ Doric Development

Bob Meyer says City is a "business partner" on the gun club property;  
says Kleinfelder did a "level I" report.

Dan Mercer of Excalttech prepared ~~a~~ a synopsis of the Kleinfelder  
report.

Bob gave me a copy of the Kleinfelder report & of Excalttech's  
summary.

Also present - Daniel Reidy, attorney  
Dan Mercer

DANIEL F. REIDY, Ph. D.  
ATTORNEY AT LAW

LAW OFFICES OF DANIEL F. REIDY, A PROFESSIONAL CORPORATION  
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K. Cherick

Maitland Drive at Harbor Bay Parkway

8/13/90

1:48 Judith Ahschuler of Alameda Planning Dept called. She knew about the lead + copper problem + wanted an OK from us in writing. Judith said that Maitland Drive will also be realigned as part of the RV storage lot / U-store-it facility development project.



Maitland Drive at Harbor Bay Parkway 8/7/90  
Meyer & Mercer did not represent the city. Bill said they had had problems with Doric Development (Bob Meyer's group) before.

4:30 Per Alameda) <sup>Planning Dept.</sup> Joan Lamphier handles Harbor Bay development (451-8046)

4:34 Called & left message for Joan Lamphier at Lamphier & Associates. (Per Alameda Planning Dept., Lamphier & Associates is a private firm which handles Harbor Bay for the planning dept.)

4:38 Called Alameda Building Dept. Central Permits (748-4530) left message with Theresa Lopez.

2:00 Joan Lamphier called & said she handles Marina Village development, not Harbor Bay. Joan said I needed to talk with Jeff Boer at the Planning Department 8/8/90

2:03 Called Alameda Planning Dept. (748-4554). Left message for Jeff Boer to call me.

11:30 Jeff Boer of the Planning Dept called. Lida Budko, Judith Atschuler may be handling the case. Jeff will check with them & call me back 8/9/90

Maitland Drive at Harbor Bay Parkway

8/6/90

Bob Meyer requested a letter indicating ~~there was~~ we thought there was no problem with the site.

8/7/90

(I prepared the letter + told Bob it was ready. I then asked Larry to review the letter. Larry said shot used at shooting ranges typically had lead + that lead levels could be a problem at the site)

11:29 Spoke with Bob Meyer. He said the shot contained lead + copper (Bob said shot is typically composed of lead + copper). Bob said several analyses have been done + that the lead exceeded allowable levels. I told Bob the site would need to be evaluated + the shot would probably need to be cleaned up. Bob said he'd have Dan Mercer give me a call to discuss what I wanted in the way of sampling.

\*\* Note: The Condensed Chemical Dictionary says shot metal is a lead alloy with less than 3% arsenic.

4:29 Called/called by Bill Norton, Alameda City Manager. I told Bill how Meyer + Mercer had not disclosed the analytical results + the high lead levels. Bill said it didn't sound like Meyer + Mercer had been truthful + that

8/3/90

Maitland Drive (at Harbor Bay Parkway), Alameda  
(NW side of Maitland)

10:00 Met with Robert Meyer + Danny Mercer to discuss current site status + future development plans. Mr. Meyer said the site is currently an abandon gun club + that there are no underground tanks at the site. The northern portion of the site is to be paved + converted into an RV storage lot and a Mini Warehouse/U Store it lot.  
(See attached diagram + aerial blue "print").

I told Mr. Meyer + Mr. Mercer that based on this information we would not need to be involved as previous uses do not indicate a possible presence of abandoned hazardous materials or of contaminated soil.

11:30 I drove to + walked around on the site. Abandoned buildings are of a clubhouse nature + do not suggest hazardous materials were stored or used on site in significant quantities. The majority of the site is undeveloped + vegetated.

Katherine Chesick



# HARBOR BAY

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