

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02761

February 15, 2006

Mr. Javier Padilla
Oakland Pallet Company, Inc.
P.O. Box 72
San Lorenzo, CA 94580

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

RE: REQUEST FOR REVISIONS TO STORMWATER POLLUTION PREVENTION
PLAN - Oakland Pallet Company, Inc., 2500 Grant Avenue, San Lorenzo

Dear Mr. Padilla:

Thank you for our receipt of your Storm Water Pollution Prevention Plan (SWPPP) on 10 February 2006. This plan has been briefly reviewed in context with the Waste Discharge Requirements (WDRS) guidance for discharges of storm water associated with industrial activities, the same guidance provided to you during the November 21, 2005 Clean Water Program (CWP) inspection of the subject facility.

As we discussed by telephone yesterday, your SWPPP does not reflect all potential stormwater impacts from activities occurring at your site, nor does it present a complete suite of Best Management Practices (BMP) appropriate to mitigate such impacts. Specifically, the SWPPP fails to mention the impacts of sediment track-out to public roads from your facility, and appropriate BMPs to mitigate those impacts.

The northern most portion of the site is currently unpaved, and becomes muddy during the rainy season. Both open and enclosed pallet transport trailers, and pallets, are stored in this unpaved area of the site. As forklifts move pallets and associated materials from the unpaved area, to the paved area, mud is tracked onto the paved portions of the site. Transport trailers likewise track mud onto the paved portions of the site. As vehicles move about the paved portions of the site, mud is spread to nearly all vehicle-accessible areas of the facility. This mud is in turn tracked out onto Phil Drive and Grant Avenue as vehicles leave the facility.

During the 2 February 2006 re-inspection of this facility, Oakland Pallet Company was advised that appropriate BMPs must be in place to mitigate the track-out problem to public roads. This is not a new issue for Oakland Pallet. Several BMPs were suggested at that time, and are memorialized on the CWP inspection report of that date.

The current SWPPP does not address this issue. Track-out of sediment to public roads, and consequent impacts to storm water runoff, is a violation of local, state, and federal clean water ordinance and statute. Oakland Pallet was advised of this fact at the time of the inspection, prior to the completion of the SWPPP. We understand that Oakland Pallet has plans to develop the northern portion of the site, but as long as that portion of the site continues to impact storm water, your SWWPP and BMPs must address those impacts.

Mr. Javier Padilla
Re: Oakland Pallet Company, Inc., 2500 Grant Ave., San Lorenzo
February 15, 2006
Page 2 of 2

At this time Oakland Pallet is directed to revise the SWPPP according to the guidance provided, and to institute appropriate BMPs to mitigate all storm water impacts associated with the industrial activity occurring at the subject location.

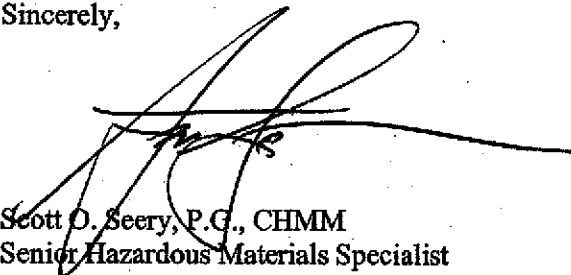
Your attention is directed to Section A: Storm Water Pollution Prevention Plan Requirements of the WDRS guidance (pg. 11-23) for assistance in determining the scope of the SWPPP and associated BMPs. Your attention is also directed to Subsections 7 and 8 of the SWPPP guidance, Assessment of Potential Pollutant Sources and Storm Water Best Management Practices, respectively, for guidance in those topic areas. Please be aware that you are to also compile a summary table of all areas of industrial activities, potential pollutant sources, and potential pollutants (SEE: Example Table B in the SWPPP guidance). We expect to see a similar element in the revised SWPPP.

Please submit your revised SWPP within 14 days of the date of this letter, or by the close of business on 1 March 2006.

Please be aware that this is a formal request for technical reports pursuant to the California Water Code Section 13267. Failure to respond or late responses to this request may subject you to a civil liability imposed by the SWRCB to a maximum amount of \$1,000 per day. Any extensions of timelines set forth in the above tasks must be confirmed in writing by this office.

If you have any questions please feel free to contact me at (510) 567-6783.

Sincerely,


Scott D. Seery, P.G., CHMM
Senior Hazardous Materials Specialist
Alameda County Clean Water Program

Attachments

- C: Susan Hugo, ACDEH CUPA
- Sharon Gosselin, ACPWA
- Steve Jones, ACPWA
- Bruce Babcock, ACCE
- Vic Pal, RWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02761

February 14, 1997

STID 5686

ATTN: Mr Alan Gibbs

Kleinfelder
2121 N. Calif. Blvd, Ste 570
Walnut Creek CA 94596

RE: Project # 4487A - Type M
at 2500 Grant Ave in San Lorenzo 94580

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$700.00, payable to Alameda County, Environmental Health Services.

We must receive this deposit so that future regulatory oversight on the subject site can proceed in a timely fashion. At the completion of this project, any unused monies will be refunded to you or your designee.

The deposit refund mechanism is authorized in Section 3-140.5 of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$94 per hour.

Please be sure to write the following on the check to identify your account:

- project #,
- type of project and
- site address

(see RE: line above).

If you have any questions, please contact Madhulla Logan at (510) 567-6764.

Sincerely,

Tom Peacock, Area Manager
Environmental Protection

c: files/inspector

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 2761

February 11, 1996

ST10 5686
Delight Saxton
McGrath Rent Corp
2500 Grant Avenue
San Lorenz, CA - 94580

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

Ref: McGrath Rental, 2500 Grant Avenue, San Lorenzo, California

Dear Ms. Saxton:

I am in receipt of the documents, phase I assessment dated December 1995 prepared by phase I Incorporated, and phase II assessments, dated June 20, 1996, July 2, 1996 and July 31, 1996, prepared by Kleinfelder for the above mentioned site.

In February 1996, eight soil borings (K-2 thru K-9) , four sludge samples (C1 to C4) from the storm drain inlets and one sample from the storm drain outlet (K1) were collected. Additionally, 1 soil sample was collected from the drum area. The samples were analyzed for semi-volatiles, volatile organics, gasoline, BTEX, diesel, motor oil and some metals. The laboratory results of the soil samples did not indicate any chemical at significant concentrations that would warrant additional investigation. The sludge samples contained zinc in concentrations up to 2900 ppm which is still less than the TTLC (Total Threshold Limit Concentration) value of 5000 ppm or the residential PRG (preliminary remediation goals) of 23,000 ppm. However, two of the sludge samples exceeded ten times the STLC values and hence were also analyzed using the STLC (Soluble Threshold Limit Concentration) extraction method. The results of the extraction test for zinc was less than the STLC.

In April 1996, the storm drain was cleaned by hydroblasting. About thirty gallons of water and thirty cubic yards of sludge were generated during the cleaning of the storm drains. Water samples (T1 to T-5) from the storage tanks and sludge samples from the two roll-off bins were collected and it was found that zinc was present above the PRG concentrations.. Hence the sludge was treated for zinc by using a lime-based chemical precipitation process until the concentrations were below the acceptable levels for disposal at Oro Loma Sanitary District.

Since the storm drain led to a drainage ditch, this area was also sampled for zinc. Zinc containing soil was excavated and disposed of at Redwood Landfill. Confirmatory soil samples indicated concentrations less than the PRG's.

Based upon the available information, and with the provision that the information provided to this agency was accurate and representative of site conditions, the residual contamination does not pose a threat to public health. If you have any questions, call me at (510) 567-6764.

Sincerely,

Madhulla Logan

Madhulla Logan
Hazardous Material Specialist

C: Alan Gibbs. Kleinfelder - 7133 Koll Center Parkway, Suite 100, Pleasanton, CA - 94566